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Leitrim County Council
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St. George's Terrace
Carrick on Shannon
Co. Leitrim
N41 PF67

26 April 2022

via email: cdp@leitrimcoco.ie

RE: DRAFT LEITRIM COUNTY DEVELOPMENT PLAN 2023-2029

A Chara,

I refer to your notification on 11 February 2022 that the Draft Leitrim Development Plan 2023 – 2029 has been prepared and inviting submissions / observations. The Northern and Western Regional Assembly ('the Assembly') wish to thank you for this notification.

The Assembly is required under S27B of the Planning and Development Act 2000, as amended, to offer its opinion on whether or not the draft and its core strategy, in particular, is consistent with the Regional Spatial and Economic Strategy (RSES) and its objectives. The Regional Assembly is required to make recommendations to the Council on any amendments necessary to ensure the Draft Plan is consistent with the RSES and to issue its report, recommendations and observations. The Members of the NWRA considered the report, recommendations and observations at its Monthly Meeting on 22 April 2022. This submission will follow the chapters sequentially as set out in the Draft Plan and offer commentary on consistency on an ongoing basis, with Recommendations and Observations being provided at the end.

Consideration of the Draft Plan

The existing County Development Plan (2015 – 2021) was due to expire in mid 2021, but its life was extended due to the completion of the RSES and the Covid-19 pandemic, which impacted all Planning Legislation timelines. The Pre-Draft Consultation on the review of the existing Leitrim County Development Plan 2015-2021 and the preparation of a new County Development Plan commenced in June 2020 and included the publication of Issues Papers.

The Assembly made a submission on 11 August 2020, which in summary, included the following:

- The Draft Plan should follow the framework of the RSES.
- The specific actions for Carrick-on-Shannon as set out in the RSES should be given detailed emphasis, inclusive of a Joint LAP with Roscommon County Council (Cortober).
- Key RSES Infrastructure priorities including the SLNCR Greenway, and N-4 upgrade would be amplified.
- Employment growth, and future housing provision should be aligned in as far as is possible.

Content of Draft Plan

The Assembly appreciate the scope and scale of the effort involved in preparing the Draft Plan. The extent of material is extensive, and comprises 4 volumes:

- (i) The Written statement (c.353 pages)
- (ii) Settlement Plans for Towns / Villages. (129 pages & 27 settlements in all).
- (iii) Book of maps
- (iv) Record of Protected Structures.

In addition, there are accompanying documents, including

- Retail Health Check,
- Economic Profile of County Leitrim,
- The Housing Strategy for the County,
- Landscape Character Assessment Review,
- Renewable Energy Strategy for County Leitrim.
- Visual Capacity Study for Windfarms.

The accompanying Environmental documentation comprises of the SEA (Strategic Environmental Assessment), AA (Appropriate Assessment), and SFRA (Strategic Flood Risk Assessment).

This submission will set out material in sequence, from the 13 chapters of the written document, commencing with the Core Strategy and will provide an overview and opinion in respect of the various aspects of the plan.

General Comments & NWRA assessment of the Draft Plan:

The Assembly note the Draft Leitrim County Development Plan is a very well-constructed series of documents, is very clear in its presentation, and its ambitions for County Leitrim are very clearly communicated.

The Draft Plan is enhanced by the addition of very clear land-use, and Landscape Character Maps, which are easily interpreted, and the overall approach results in a document which, despite its scale is generally user friendly, and this should allow the general public to

interpret it without difficulty. There may be an opportunity to reduce the burden of text within the plan, particularly where it quotes (or summarises) from other policy statements (including the National Planning Framework (NPF) and Regional Spatial and Economic Strategy (RSES). The inclusion of links to documents and graphic design may assist in this regard.

For the purposes of evaluation, this submission will concentrate on proposed objectives/policies that have regional significance.

Chapters 1 & 2: Introduction & Core Strategy:

The Core Strategy sets out clearly the ambition to grow Leitrim's population over the lifetime of the Plan by approx. 3,500 from the 2016 Census figure (i.e. from 32,000 to 35,500 by 2026). This projected growth is generally in accordance with the NPF Implementation Roadmap – July 2018).

The Draft Plan notes the forecasted increase cannot be achieved via a natural increase within the County and will be dependent upon significant in-migration to the County. It outlines how the current output of houses (54 per annum) will have to generally treble over the plan period to 154 per annum. This will prove a particular challenge for County Leitrim given ongoing lack of output combined with price inflation across the Construction sector.

The Settlement Hierarchy for the larger towns in Leitrim is as follows:

Tier 1 – Key Town: Carrick-on-Shannon .

Tier 2A – Sub Regional Growth Centres: Manorhamilton & Ballinamore.

Tier 2B – Support Towns: Dromahair, Drumshambo, Mohill, Kinlough.

Tier 3 comprises Key Villages, of which there are 6,

Tier 4 Villages, of which there are 14, and

Tier 5 is described as Graigs, where the established rural node has some community / social services; there are 24.

The Assembly consider the overall settlement framework to be consistent with the RSES, and while Ballinamore is of a lesser scale in terms of population as a Tier 2A Settlement, it is significant in terms of the sub-county role it performs and the level of services it provides to its largely rural hinterland.

The Core Strategy allocates 30% of the County population increase to Carrick-on-Shannon. This is broadly consistent with the RSES. Carrick-on-Shannon is identified as a Key Town in Section 3 of the RSES - RPO 3.1. Section 3.4 aims to bring a 30% population uplift. The Population in Carrick-on-Shannon as per the 2016 Census extends to 4,062. To increase this by 30% between now and 2030 would see circa. 1,200 extra people added to the Town. Given the lifetime of this Plan extends to 2029, the majority of the required uplift will fall in this plan period. The Core Strategy also proposes that 30% of all new housing within Carrick-

on Shannon, Manorhamilton and Ballinamore be within the urban footprint of the settlement – consistent with RPO 3.2c of the RSES (see Objective CS OBJ 5).

It is important to note that this plan does not propose any landuse zoning for Carrick-on-Shannon - this being delivered separately through the LAP process. Thus, there is a potential delay in planning for this important Key Town at the top of the County Settlement Hierarchy, which could place it at a disadvantage.

The Core Strategy acknowledges RPO 3.2 of the RSES, which requires that at least 20% of all new housing in rural areas be on brownfield sites and this is reflected in CS OBJ 6 in respect of settlements contained in Tier 2B and 3 of the Settlement Hierarchy (settlements with a population of less than 1,500). It does not explicitly extend to other rural areas, which is considered a gap in the objective. The Core Strategy also reflects RPO 3.7 of the RSES in promoting and supporting the provision of serviced sites in smaller villages and graigs, through Objective CS OBJ 15.

Chapter 3: Housing Strategy:

The Housing Strategy provides detail on projected housing requirements for the plan period across various tenures and types and has been informed by a Housing Needs Demand Assessment (HNDA), which provides the evidence base in identifying the housing needs arising in the county over the period of the plan. It supports the delivery of compact growth and deals with it in greater detail under Chapter 6. This chapter deals with rural housing in detail.

Rural Housing: Leitrim has been categorised into 2 areas, (i) Areas of Low Capacity (including areas under strong urban influence) and (ii) Other Rural Areas. The areas where the low capacity designations apply are those under pressure for single housing on the outskirts of Carrick-on-Shannon, and around Dromahair, where proximity to Sligo Town is an influencing factor in increasing demand. The DED calculations for the designations are based on POWSCAR data from 2016, where 15% or more of residents are commuting into the relevant urban centre. It should be noted this approach is consistent with that employed in the National Planning Framework (NPF). It includes a suite of Objectives/Policies. The Assembly, in dealing with similar issues in other plans, took the view that the Local Authority is best placed to determine details of rural housing policy. Unless specifically stated to the contrary below, proposed provisions in relation to rural housing are supported by the Assembly.

RUR SET POL 1 of the Rural Housing Policies provides support for the development of serviced sites within small settlements & villages – delivering upon Core Strategy Objective CS OBJ 15. However, there is no additional detail in relation to a programme, whether in the short term, or on a multi-annual basis, nor is there any elaboration as to how the Council will lead out on this initiative, which is an ambition of the RSES, (RPO 3.7). A clear time-frame should accompany policy detail in relation to same, to effectively align policy with the said RSES Objective.

RUR SET POL 9 seeks to restrict new accesses to serve individual residential developments onto national roads and the R280, save for exceptional circumstances, where alternative access cannot be achieved. The provision of access directly onto a national road in these circumstances would not be consistent with RPO 6.5, which seeks to ensure optimal use of national roads from a capacity and safety viewpoint. Consistency with NPF and NDP policies and Section 28 Guidelines would also be of concern. Therefore, reference to national roads in this policy should be omitted.

Additionally, as previously referenced, the Core Strategy (Chapter 2.9) contains an Objective to deliver at least 20% of all new housing in rural areas on brownfield sites. In Chapter 3, at para. 3.15.7, it is stated that the Council will favour refurbishment / replacement of derelict houses. However, there is no reference to a 20% target, or any other target. This is a gap in the plan that should be addressed by including a policy to align fully with the RSES.

Chapter 4: Economic Development:

Chapter 4 acknowledges the role of the LECP and the importance of it being consistent with the Development Plan. It provides an economic profile of Leitrim, key principles and a vision. The economic indicators for County Leitrim have been characterised with a downward trajectory over the period 2011-2016. The County witnessed a net loss in jobs (less 400) as well as an increase in the outflow of workers from the County on a daily basis (at 44% of all workers). These statistics, whilst not recent, illustrate the challenge the County faces in creating, and retaining employment for people within the County. However, it acknowledges that there have been recent signs of growth, namely in Carrick-on-Shannon, via Vista-Med and the Carrick Business Campus. Additionally, it is anticipated the trend towards remote working, during and post the Covid pandemic will benefit the County to reduce outward daily flows.

The plan identifies the strategies and structures that will be utilised to deliver the economic vision - including the AEC; NW Enterprise Plan; Upper Shannon Erne Future Economies Project; Framework of Regional Priorities for the Central Border Area; Leitrim LEO; and the Economic Development Department of the Council. Several policies are proposed that support the outputs of the LECP, the work of the LEO and Economic Development Dept. and the collaborative work of national agencies and the third level education sector. Specific policies are proposed that support the AEC. All of these policies are consistent with the ethos of the RSES.

Chapter 4 dedicates a sub-section to the role of urban centres and include policies that advocate integrated land-uses, shared working hubs and home-based start-up enterprises. The key future priorities for Carrick-on-Shannon are set out within Section 4.8.1 and align with those set out in the RSES (Section 3.9). Of particular note is CARRICK OBJ 6: *'To pursue the sustainable development of the new regionally significant opportunity site to the east of Carrick-on-Shannon and contiguous to the existing land use zoning envelope for use as a data centre or alternative regionally scaled employment use following the undertaking of a feasibility study. Access would potentially be from a National Primary Road (outside of*

reduced speed limit zone) and careful consideration of options is required. This will require inclusion of an exceptional circumstance for a new entrance off the N4 to be agreed with the TII in accordance with the Spatial Planning and National Roads Guidelines.’ This again, reflects the content of the RSES, and it would potentially be beneficial if Leitrim County Council set out a timeframe for when this further analysis will be done.

Chapter 4 also provides a suite of enterprise and employment objectives and policies, including support for development of co-working spaces/hubs and the development of Leitrim as a SMART County. It confirms that alongside Carrick-on-Shannon, Manorhamilton and Ballinamore will be the key priority centres for future investment.

The Chapter includes a sub-section dedicated to retail development, setting out changing retail patterns and how it is impacting on Leitrim. It establishes how the plan is consistent with the Retail Planning Guidelines and provides a range of retail objectives and policies that are consistent with the Guidelines. The draft plan identifies the extent of the core retail area for settlements and regeneration opportunities for settlements are also identified – except for Carrick-on-Shannon, as a new Joint LAP will be prepared for it and Cortober (Co. Roscommon). The objectives and policies contained in this Chapter are consistent with the RSES.

Chapter 5: Tourism:

Tourism is envisaged to be a key growth area for County Leitrim as the Country emerges from the pandemic, and the ambition is to significantly grow visitor numbers to capitalise on the natural assets of the County, as well as the branding of much of the County as central to Ireland’s Hidden Heartlands and North Leitrim as part of the Wild Atlantic Way.

Chapter 5 is comprehensive in terms of the priorities for County Leitrim, and the importance of Slow Tourism and the offer of facilities along the Shannon, as well as other assets potentially being improved, with one example being access to O’Donnell’s Rock (Refers: Tourism Objective 8). It also includes an objective to investigate the feasibility and potential of North Leitrim, Sliabh an Iarainn and its hinterland as a National Park/Recreational Area (TOUR OBJ 3), which is consistent with RPO 5.3 of the RSES.

The Chapter reflects much of the ambition contained within the RSES, including the role of Carrick-on-Shannon as a Key Destination Town within the context of Ireland’s Hidden Heartlands (see 5.7), in line with Failte Ireland’s framework for the Shannon Region, and this status would include likely upgrades in certain public amenities (e.g. public transport) and expansion in accommodation in Carrick-on-Shannon and elsewhere across the County. A range of supporting objectives and policies are proposed that are consistent with the RSES.

Chapter 6. Urban Settlements

The aims of this Section of the Plan are broadly reflective of Governments recent publication - *Ireland’s Rural Future: Rural Development Policy 2021 – 2025*.

The Town Centre First approach advocated in the draft plan aligns with Government's recently published Town Centre First Policy, and with a multitude of RSES ambitions, including in Section 3.4 & 3.5 of the Regional Strategy.

A commitment to Compact Growth forms part of this ambition, and Leitrim County Council has identified Carrick-on-Shannon, Manorhamilton, and Ballinamore as key to ensuring 30% of all new homes are delivered within the built-up footprint of each settlement – being consistent with RPO 3.2(c) of the RSES. The proposed development of Action Plans to tackle dereliction is a further measure to be welcomed.

The objectives and policies within Chapter 6 are welcome. It would be beneficial for the plan to include a commitment to retain a record in relation to (i) developments comprising compact growth (ii) urban regeneration and (iii) housing constructed within the County's settlements as part of its plan monitoring and evaluation.

Chapter 7: Sustainable Communities

Chapter 7 details measures around inclusivity, and Community participation across a range of areas. The roles of Public Participation Networks, Age Friendly Organisations, as well as Disability Campaigns are attached to objectives (e.g. Section 7.7.4). This is consistent with Chapter 7 of the RSES (Inclusive Region), which sets out multiple objectives across the same areas of focus. Objectives in relation to education facilities, including preschool, primary & secondary level education, as well as further education and training are included at Section 7.8.3 and there is again, strong alignment with regional ambitions set out in the RSES.

Chapter 8: Transport

The policies in relation to transport have at their centre the key priority of linking land use planning with transportation. Key to these policies are the reduction in energy demand and to achieve modal shift (away from the private car).

As per RPO 6.27, there is a clear commitment to embark on preparing a Local Transport Plan (LTP) for Carrick-on-Shannon, and this will be used to inform the forthcoming LAP for the Town, which is to include lands at Cortober (Co. Roscommon). The commitment to preparing a LTP for Carrick-on-Shannon and to identification of Modal Share Targets in this regard are to be welcomed.

The Draft Plan details the priority Greenway & Blueway projects in County Leitrim. There are at least 12 objectives listing these routes, including SLNCR Greenway (Dromahair) and the Cavan / Leitrim Greenway (Dromod – Belturbet). The Assembly believes that a project table would allow the reader of the Plan much greater clarity on these projects, and could supply detail as to whether the projects are Short / Medium / Long Term ambitions, and the associated time-frames.

The Transport Chapter also details the Carrick-on-Shannon to Dromod N4 upgrade scheme, which is identified in the RSES as a regional priority, and critical to improve access to the North West, including Sligo and Donegal. (RSES RPO 6.7 refers). The N-16 upgrade, which is

incremental and ongoing, is also identified as a priority, and this is consistent with RPO 6.8 of the RSES and key to enhancing East / West access, from Cavan towards Sligo Town.

Chapter 9: Infrastructure & Energy

The first section of Chapter 9 includes water quality, ground water quality, initiatives around protecting the status of water bodies, including the Blue Dot Catchments Project Initiative. It should be noted that in terms of water bodies, much of Leitrim, particularly North Leitrim (upland areas) enjoys good status at present.

Chapter 9.8 details Flood Risk Management – Flood Relief Schemes for Leitrim, identified by the OPW as necessary in 2018 and which are at various stages of progression at present, include Mohill, Carrick-on-Shannon, Leitrim Village & Dromod. The objectives associated with Flood Risk Management, Justification testing etc. are consistent with Section 8.5 of the RSES.

The delivery of broadband (via the NBP) and through other initiatives, such as the Digital Strategy for Leitrim are clearly supported in Chapter 9 and this is again consistent with the aims of the RSES (Section 6.5, RPO's 6.36 – 6.40).

Chapter 10: Rural Development

Chapter 10 outlines at the outset the value of agriculture to the County, inclusive of direct, and indirect employment in farming / food production respectively. There are policy objectives which outline the willingness of Leitrim County Council to assess business locations in rural areas, subject to normal planning considerations, and the Assembly believe the Council are best placed to formulate policy in this regard.

Section 10.6 outlines the Draft CDP policy in relation to forestry. The Climate Action Plan has set ambitious targets in relation to growing forestry across the Country, and currently the State are behind the target of planting 8,000 ha. per annum (rate is 5,500ha. p/a present). Leitrim has the highest percentage of land planted for forestry of any county in the State, and this sits at 19% currently. The Plan notes that post 2018, there has been a marked reduction in plantation approvals in the County (owing to appeals). The sector is a significant employer in the County, with 500 plus jobs in the County related to forestry in 2018. However, the recent scale of afforestation has implications for the landscape of the County, and its capacity to absorb ongoing proliferation. A Landscape Capacity Study in this regard is being conducted and may be completed before the finalisation of the CDP. Pending the completion of this study, the Council, in order to ensure the sustainable management of forestry, has outlined a number of restrictions to new planting, including:

- No plantations above a 300 metre contour line.
- Restrictions around Lough Melvin, Lough Allen, Lough Gill, and around Ballinamore.
- Restrictions around North Leitrim, including Sliabh an Iarainn.

The Assembly acknowledge that extensive, ongoing plantations have proved controversial in County Leitrim in recent years. To this end, RPO 5.24 aims to invite stakeholders, including

state bodies to participate in a forum which can balance the needs of communities against the State ambitions on afforestation.

In relation to any geographic limitations for amenity / landscape capacity grounds, the Assembly is of the opinion that Leitrim County Council are well placed to determine conflict with the Counties amenity offer and associated image from a tourist / outdoor adventure viewpoint.

Chapter 11: Heritage

The overarching goals of Chapter 11 are to protect the biodiversity, and conserve non-renewable resources within County Leitrim. It should be noted that a Heritage Plan for County Leitrim (2020 – 2025) is already in effect.

Sections 11.3.3 & 11.3.4 set out clear policies in respect of the protection of Natura 2000 sites, and this is consistent with the goals of the RSES (Section 5.5).

In respect of Landscape (Section 11.3) Leitrim County Council undertook a significant body of work, including a full review of its last Landscape Character Assessment, conducted in 2002. There are now 17 Landscape Character Types identified in the County.

Further policy measures include:

- The identification of 29 views & prospects across the County to be protected.
- Zoning of areas of High Visual Amenity / Outstanding Natural Beauty.
- The separation of the County into 14 landscape character types.

The measures outlined in the Draft Plan to protect these areas and to control development in multiple forms is considered to be appropriate and follows RPO 5.2(a) of the RSES.

Chapter 12: Climate Action & Renewable Energy

The Leitrim County Council Climate Adaptation Strategy 2019 – 2024 has set out 7 high level goals for the County, including the formation of a Climate Action Steering Group to oversee climate action implementation.

In terms of emissions (GHG) the agricultural sector (43%) is the primary contributor.

Chapter 12 contains a Draft Renewable Energy Strategy for County Leitrim. The high level goal is to install a minimum of 200MW of renewable energy in County Leitrim over the next 8 years, up from a current output of 90MW, which is 2% of the production in the State. This target seems relatively modest, however a sensitivity mapping exercise (wind potential) carried out as part of the plan preparation is said to indicate that there is very limited capacity to absorb large scale wind energy projects. Six main factors have been provided as to why this is the case.

Chapter 12.6.4 outlines the County Council's position on bioenergy, but the policy objectives do not fully give effect to the RSES RPOs relating directly to the Bioeconomy / Biomass.

Therefore, the amendment of this section of the Draft Plan is recommended to reflect the RSES RPOs on feasibility / bio-refining facilities, as well as future proofing.

Chapter 13: Development Management Standards

This section sets out the general development management principles and standards that are to be applied. There is no comparable section within the RSES.

Recommendations:

1. Omit proposed reference to exceptional circumstance for access to national roads, as provided within RUR SET POL 9.

Observations

1. Consideration should be given to exploring opportunities to reduce the burden of text within the core document, particularly where it quotes (or summarises) from other policy statements (including the NPF & RSES). The inclusion of links to documents and graphic design may assist in this regard.
2. Should the Draft Plan be adopted in its present form, there will be an absence of zoned lands and constrained policy direction for Carrick-on-Shannon. The Planning Authority should consider options to fill this vacuum and provide greater certainty, enabling more planned sustainable development to occur.
3. The Plan be amended to explicitly include a policy objective and accompanying detail which gives effect to RPO 3.3, which seeks to ensure 20% of new rural development occurs on brownfield sites (ie. in towns/villages under 1,500 population and rural areas/countryside).
4. The Development Plan would benefit from a clear elaboration on the provision of serviced sites in the smaller towns / villages of County Leitrim, including timeline for the roll-out of the programme, commitment to a 2-year implementation plan (RPO 3.7 refers) and commitment to the Council leading out on the initiative.
5. The Plan should include a commitment to retain a record in relation to (i) developments comprising compact growth (ii) urban regeneration and (iii) housing constructed within the County's settlements, as part of its plan monitoring and evaluation.
6. Within Chapter 8, incorporate a Table and Map of Greenway/Blueway Projects confirming whether the projects are short / medium / long term ambitions, and associated time-frames.

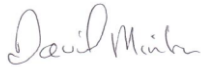
7. That Section 12.6.4 of the Plan is revised to fully reflect the regional ambitions on the bio-economy (inc. biomass). This modification should fully incorporate the regional policy objectives of the RSES, including RPOs 4.27, 4.28 & 4.29.

Conclusion

The Assembly is generally satisfied that the Draft Leitrim County Development Plan is consistent with the policy objectives in the RSES. It is believed that consideration of the recommendation and observations will ultimately strengthen the governance of the Development Plan upon adoption.

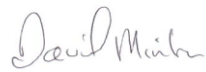
The Assembly acknowledge the quality and clarity of the documentation published in the Draft Plan and wish to thank the Council for the opportunity given to engage in the process. If you have any queries in respect of the above, then do not hesitate to revert.

Mile le mas,



David Minton
Director

Yours Sincerely,



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