

**Planning Department,
Leitrim County Council,
Áras an Chonate, St. George's Terrace,
Carrick-on-Shannon,
Co. Leitrim N41 PF67**

Re: 'Draft Leitrim County Development Plan 2023-2029'

Dear Sir/Madam,

I wish to take the opportunity to make comments and suggestions regarding this draft development plan. This plan is made/adopted by the Leitrim County Council which is responsible for the proper planning and development of the county of Leitrim. It covers the period 2023 to 2029, a period which looks like being turbulent and unsettled and likely to bring rapid change in Ireland politically, socially and economically. This county has many strengths all of which must be leveraged, if the population and the services required are to thrive and prosper.

It is clear that Leitrim does not exist in isolation and that this plan is part of a Planning framework and National Guidelines. However, these are not necessarily up to date, do not take account of the special conditions in this county (which always lies on the extreme edges of every National statistic table) and many of the National objectives/guidelines are contradictory, out of date or too simplistic.

This plan attempts to balance all these competing requirements and is unable to commit to anything. A plan should have objectives that are measurable and a time-scale by which they will be achieved. This plan fails to do this, is not quantifiable and not measureable. It is made up of standards, specifications and general aspirations. I believe that this plan should identify a number of key tangible and strategic projects which the County Council will deliver within the period of the plan. These would encourage economic activity in areas that Leitrim can excel.

Housing Policy:

There is a nationwide shortage of housing. It is stated that Leitrim has one of the highest level of vacant housing (not holiday homes) in the State. The Council will encourage the occupation of these properties prior to building any further houses. After three successive plans, a severe housing shortage and soaring building costs, we still have one of the highest vacancy rates in the country. The current refugee crisis brings National focus and resources on these unused properties. Is it a plan objective to identify, acquire and refurbish these properties and amend the list of vacant but habitable properties by 2023?

The combined wisdom is that pre-fabricated timber housing is probably the only way that the required housing stock will be provided while meeting our Climate Plan targets. Is there a Plan objective to locate such a plant in Leitrim? There is also a shortage of building skills in the country generally but also locally. Is it planned to organise apprenticeships for local school-leavers who will be trained in these skills and who could live in and energise our communities?

Since the 1990's Leitrim Co. Council has invested heavily in its civil infrastructure – water networks, treatment capacity, waste water and telecoms. It has a very robust and reliable electricity supply system. The result is that we have hundreds of acres of serviced land. This has kept the price of serviced land very low compared to other counties. This is a public resource and an investment whose time has come. It is vital that none of this is de-zoned at a time when the country requires affordable housing. Zoned serviced land is one of this county's significant competitive advantage.

This Plan's housing policy is underpinned by data contained in Appendix 5. This data is out-of-date or missing and where necessary synthesised. From this shaky base, housing demand and residential zoned areas are extrapolated for each town/village in the county with totals carefully fitted to Leitrim's allocation of the Regional population growth target. While this is nonsense, it will in all likelihood thwart the efforts of local investors, returning emigrants or speculative builders.

This county has a tradition of rural housing. This is tied up with identity, caring for the elderly, affordable housing (low cost sites, phased accommodation). Efficient and competitive services and environmental standards are driving people to the towns/villages where the new standards are more easily met. However, cheap serviced sites, the ability to build and extend if required later, and to have an individual design are required to encourage the transition from rural to "urban". By supplying serviced sites with outline planning permission and connections to Irish Water services, the Leitrim County Council would be encouraging and promoting the proper development of the county. This would also help to retain a cohort of skilled labour until speculative builders return to the county.

Renewable Energy:

To date, the provision of renewable energy is a National objective and this objective trumps all other considerations. This is transforming our last remaining wildernesses and pristine habitats into industrial sites for the economic benefit of foreign companies and investors. National targets for renewable energy will not be achieved on-shore. The Off-shore industry is well developed in Europe and our off-shore regulatory system is now being put in place with our first tranche of grid capacity over-subscribed. On shore turbines will be less efficient than off-shore given their relatively small size. There is no need and no benefit in allowing further windfarm development in the county. I recommend the designation of all land higher than 200m as protected habitats under the EU Wildlife Directive. (Ireland has been frequently criticised for the small percentage of lands designated under the Directive). The protection of these designated areas would also be a National objective and would afford the necessary protection to our landscapes, aquatic habitats, wildlife and to our tourism product.

Rapid Charging Infrastructure:

The National Climate Change Plan includes an objective for 1 million electric cars by 2030 or approximately 50% of the cars on Irish roads. With tourism a key industry for this county, it is clear that public charging points will be required throughout the county. While standard cp's may be adequate at Apartment blocks and hotels, those at Leisure centres, Workplaces, Shopping/restaurants and Service stations will require to be rapid charging. There are many management systems, financing systems and specialist installers now available but they must be supported by robust Eirgrid infrastructure. These rapid charging stations need to be safe, lit, linked to social amenities and well distributed across the county. Will it be an objective of this plan to identify suitable sites and ensure the provision of 18 multi- rapid charge stations throughout the county?

Remote working:

Remote working facilitates the location of a highly skilled and educated workforce in very rural areas bringing with it immense social benefits. Communal workplaces, like “The Hive”, multiply these benefits and transfer knowledge, networks and ideas into the broader community. Smaller versions of the Hive perhaps co-located with a post office and farmers market should be located in each of our 9 largest settlements. Co-location would simplify management and maintenance once these were established.

Local Markets:

The change in emphasis in the CAP programme, the focus on food security and the European emphasis on organic food production will change land-use in this county over the coming years. Grants for biodiversity, increased demand for timber and poor prices for product will reduce food output and will drive landowners towards organic food and added value farm products whilst managing the bulk of the land for nature and or timber output. Labour intensive high quality food, sold directly to homes and restaurants (by-passing the retailer) will attract the sustainable income required. (This is already happening in several areas around the country). Attractive markets located in central parts of our nine largest settlements would promote such economic activity and would be a permanent asset for the community. Clearly, this would also support the craft industry and could also, with proper design, facilitate drama groups or concerts.

National Roads:

These are the arteries of the country bringing people, money and energy to an area. The current work on the Strokestown-Ballaghaderreen road (which includes a wide by-pass of Tulsk with a re-aligned link to Boyle poses a threat to Carrick on Shannon. It is clear that a by-pass of Carrick on Shannon is necessary but is unlikely to be built before 2028. From Carrick on Shannon’s point of view the location of the by-pass, the nature and number of access points to it will be critical. Access should be via grade-separated interchanges at both ends and a location close to the town would be preferable (for businesses, the industrial estate, the natural environment) even if this meant reducing the speed limit to 80kms/hr (this would reduce noise levels significantly). A well located and easily manoeuvred Bus stop should be established as part of this project in consultation with Bus Eireann and Rural Link.

However, during the period of this plan, traffic management measures in the town of Carrick on Shannon should be developed and implemented to reduce the number and duration of traffic congestion incidents. These measures would be relatively cheap using existing road space for the most part and could be partially reversed on completion of the By-Pass.

The N15 is complete and there are no serious threats from current proposals on the N16.

Railway Station –parking/charging/taxi/bicycles:

The rail link to Dublin is a key part of Leitrim’s infrastructure. The station in Dromod is reasonably well provided for whereas the main station in Carrick on Shannon is sadly deficient. I understand that Roscommon County Council will work in partnership with Leitrim Co. Council for the development of their side of the town. A large car-park for commuters incorporating a taxi rank, electric charging stations, covered bicycle storage and local link bus stop should be provided. There

is open land opposite the station which would facilitate this. Ideally, the public road could be re-directed around this future car-park to improve safety and allow it to be integrated with the station. It is not necessary that Iarnrod Eireann own or operate the facility.

During the course of this development plan, it should be an objective to extend the commuter train service to Carrick on Shannon. To this end, it would be important to establish the detail of what physical work is required on the rail network between Longford and Carrick on Shannon to achieve this and to allow for this work in this and subsequent plans.

I believe that this plan requires a number of key strategic but measurable goals that will contribute to the economic and social development of County Leitrim and can be achieved during the lifetime of the Plan. I have suggested a few of them above.

I hope that you will consider these and incorporate them into the Leitrim County Development Plan.

Yours sincerely,

Brian Kenny BE, C.Eng.

27th April 2022