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Planning Department
Leitrim County Council
Aras An Chontae
St Georges Terrace
Carrick on Shannon
Co. Leitrim

Tuesday, 26th April 2022
[By email: cdp@leitrimcoco.ie]

SUBMISSION DRAFT LEITRIM COUNTY DEVELOPMENT PLAN 2023-2029

Dear Sir/Madam,

RE: LANDS AT TULLYLANNAN, LEITRIM VILLAGE, CO. LEITRIM – IN THE OWNERSHIP OF MR. CHARLES DONNELLAN

1.0 INTRODUCTION

The Planning Partnership, The Bank Building, 52 Oliver Plunkett Street, Mullingar, Co. Westmeath are instructed by *Mr. Charles Donnellan*, [REDACTED], Co. Dublin in respect of the consideration of the subject lands as providing an opportunity to present a consolidated village form to meet the growing demands of living accommodation not just within Leitrim Village but in rural County Leitrim.

We present herein the importance and significance of the subject lands and the proposals as merit consideration in respect of key Departmental Guidelines namely, *Rebuilding Ireland, Housing for All*, and the *National Planning Framework* .

In this respect our Client, Mr. Charles Donnellan herein presents the availability of the subject lands as previously zoned within the current Leitrim Village Plan for a planned extension of the village to provide settlement consolidation for a Tier 3 settlement in close proximity and supporting the urban strengthening of a Tier 1 settlement, namely Carrick-on-Shannon.

1.1 Purpose of Submission –Consolidation

The purpose of the submission is to highlight the unique characteristics of Leitrim Village as a settlement in the wider County and in turn to demonstrate a rationale for a necessary new residential zoning objective to support allocation of housing units to the settlement over the next 6 year Development Plan period and whereby it is acknowledge that the previous zoning allowed for a zoned 'residential reserve'.

This action will allow for the sequential development of an infill residential site resulting in the consolidation and enhancement of the settlement, allowing it to perform a supporting role to the nearby Tier 1 settlement, reducing pressure for unsustainable development in the area of urban influence around Carrick on Shannon, in accordance with recent Regional and National Policy.

1.2 Executive Summary

It is submitted that this document demonstrates that the Tier 3 Settlement of Leitrim Village has different characteristics than the other settlements in this category within the Co. Leitrim Settlement Hierarchy.

The spatial layout of the village and the 'infill' nature of the subject lands is very much apparent when the geographical and spatial layout of the Tier 3 Settlements are compared.

This issue coupled with Leitrim Village's close proximity to the Tier 1 Town of Carrick-on-Shannon increases the range of services available to it, compared to the other Tier 3 Settlements and further allows it to support the Tier 1 settlement by deflecting pressure for unsustainable 'once-off' housing development into an already serviced settlement.

This type of effective strategic planning is endorsed and advocated by the National Planning Framework and the Regional Spatial and Economic Strategy for the area, and policies that support this approach have been highlighted in this submission.

The incorporation of an identified playground on the subject lands for use by the wider community is welcomed and will enhance any proposed development as well as contributing to the recreational wellbeing of the wider community.

The landowner Charles Donnellan, welcomes and endorses the proposed 'New Residential' zoning as indicated in 'yellow' on the Draft Village Plan for Leitrim. However, this submission further suggests an increased 'New Residential' zoning to mirror the former (2015-2021 Plan) 'Residential Reserve' land allocation to the Draft Leitrim Village Plan 2023-2029.



Source: Leitrim Development Plan 2023-2029 annotated by The Planning Partnership

KEY:

Lands Proposed Zoning as New Residential

Indication of Potential Access Routes

We therefore request that Leitrim County Council in addition to the proposed new residential zoning contained within the Draft Leitrim Village Plan apply a 'new residential' zoning objective to the outlined (dashed red) portion of our clients landholding at Tullylannan; shown unzoned in the draft Development Plan and as highlighted in this submission (Figure 5.2) in order to enable and facilitate

appropriate housing land supply to allow the development of a consolidated settlement during the life of the proposed Leitrim County Development Plan.

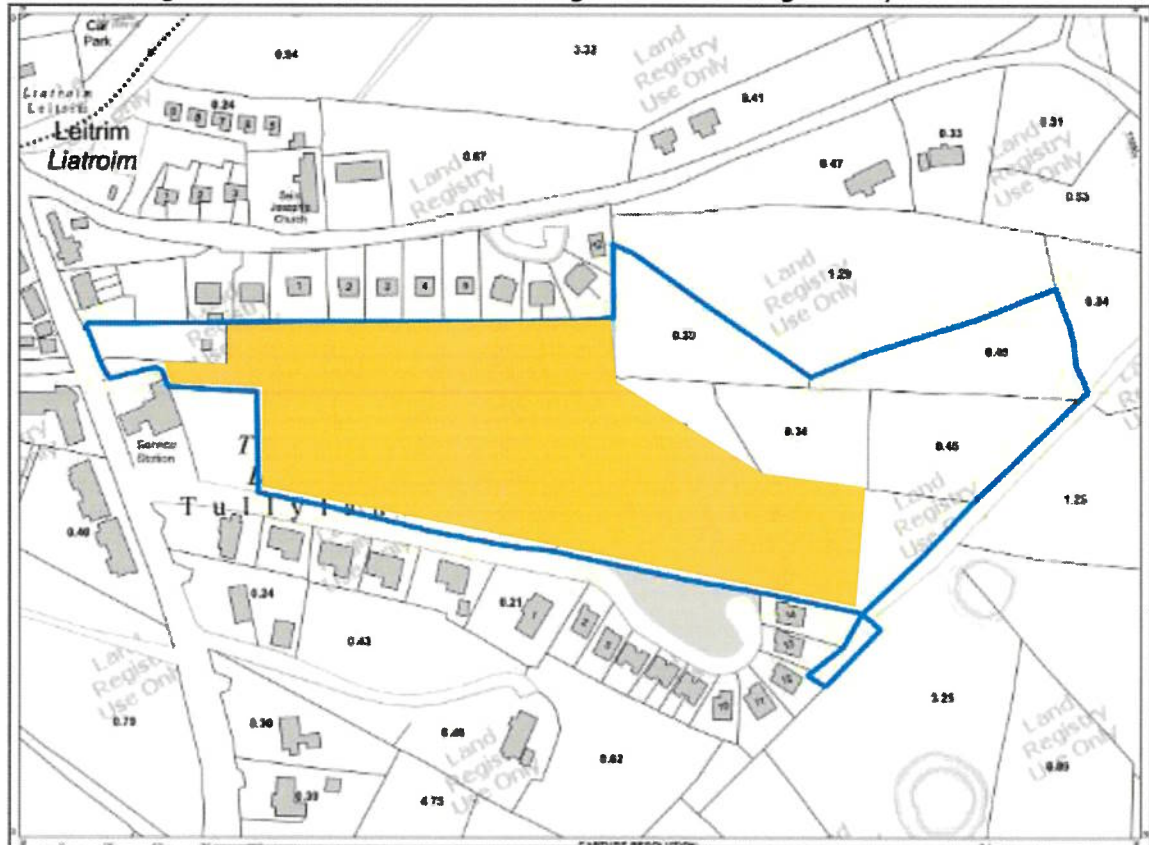
The site is strategically located in proximity to the village centre of Leitrim Village, and due to this can facilitate an additional residential development designed to integrate with the existing development around it and further enhance the community in this settlement.

The lands can provide for accessible and permeable development and as allows for active transportation routes into and through the site and neighbouring sites.

2.0 SITE LOCATION AND DESCRIPTION

The site is located at the centre of Leitrim Village and is approximately 5.1 ha in area. The site abuts McCormack Mace Neighbourhood store and neighbourhood centre which is situated on the R280 or Main Street of the town. There is low density residential development to the north and south of the site. The site slopes upwards from west to east. There are established hedgerows and field boundaries on the existing site. There appears to be some agricultural structures at the western end of the site. There is an existing access to the lands from the R280 adjacent to McCormack's Service Station and potential access from the Riverdale estate to the south.

Figure 2.1 Site Location Landholding – Current Zoning Overlaid



Source: OS Map reproduced under License AR0114722

2.1 Planning History

There does not appear to be any relevant planning history associated with the subject lands.

2.2 Development Potential

The subject site has direct road frontage onto two existing roads and can connect to all the necessary services and utilities, which are all adjacent to the lands. There is direct vehicular access from Leitrim Village Main Street and also a number of possible entrance(s) via the existing Riversdale housing development to the South of the subject site (Subject to agreements/legal access rights). The subject site is a 'ready-to go' site for housing development in the heart of Leitrim Village, with all the necessary infrastructure available. Our client, in conjunction with an experienced developer and house builder, have already engaged in Section 247 pre-planning consultation with the Planning Authority regarding a proposed residential development on the subject lands. It is the intention to finalise and submit a planning application at the earliest opportunity, subject to appropriate zoning in place.

3.0 PLANNING POLICY CONTEXT

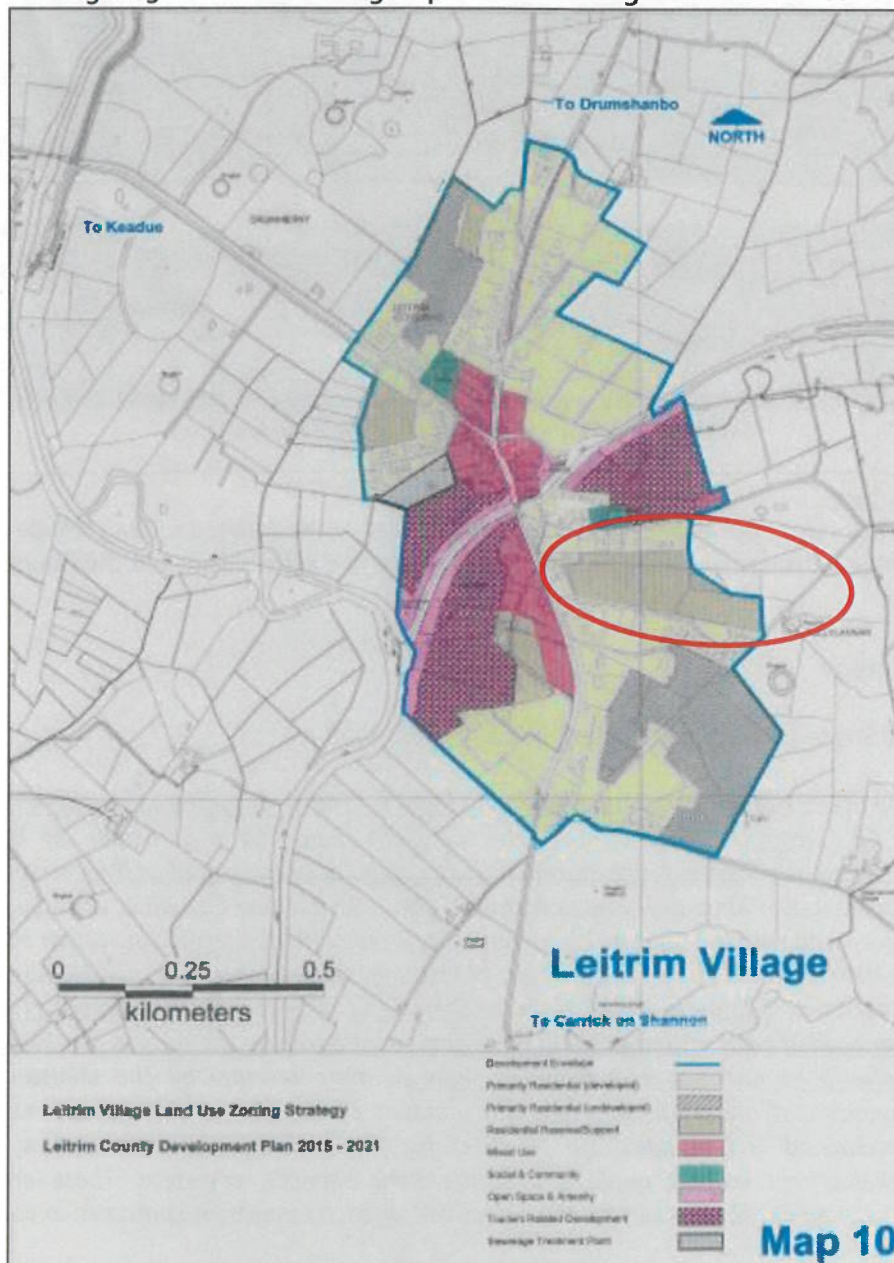
3.1 Leitrim County Development Plan 2015-2021

There has been a marked change in the area of residential zoning in Leitrim Village and the consequent projected increase in dwelling numbers over the period of the Draft Development Plan 2023-2029.

Tables 2.5 & 2.6 of the draft plan entitled: Yield of Available lands zoned for Residential or Mixed Use in the Leitrim County Development Plan over the two plan periods, sets out the following:

Plan Period	Settlement	Zoned Hectares	Housing Yield
2015-2021	Leitrim Village	7.3	106
2023-2029	Leitrim Village	1.91	26
	Difference	-5.39	-80

Figure 3.1 - Current Zoning Map – Leitrim Village – Site Identified



Source: Leitrim County Development Plan 2015-2021

3.2 Draft Leitrim County Development Plan 2023-2029

3.2.1 Settlement Hierarchy

The Settlement Hierarchy for the County is set out as follows under Section 2.4.

Figure 3.2: Extract from Settlement Hierarchy

Level	Role	Centre (2016 Population where available)
Tier 1 Key Town	Large economically active towns with a strong employment base and good transport links and capacity for continued sustainable growth acting as catalysts for the wider sub region. Key Towns are identified in the RSES.	Carrick-on-Shannon (4,062) ²
Tier 2A Sub Regional Growth Centres	Towns with moderate levels of population that provide important employment and services for their surrounding areas. These self-sustaining towns are served by good transport links and play an important role in	Manorhamilton (1,466) & Ballinamore (914)
Tier 3 Key Villages	Large villages with local service functions, specialized employment in some centres and which play an important role in supporting the social, economic and cultural life within rural communities.	Carrigallen (387), Dromod (555), Drumkeeran (220), Drumsna (240), Leitrim (594) and Tullaghan (253)

Source: Draft Leitrim County Development Plan 2023-2029

Commentary

It can be seen from the above table that Leitrim Village is designated a Tier 3 Village described as a large village with local service functions. There are five other villages in the County in the same category.

3.2.2 Core Strategy

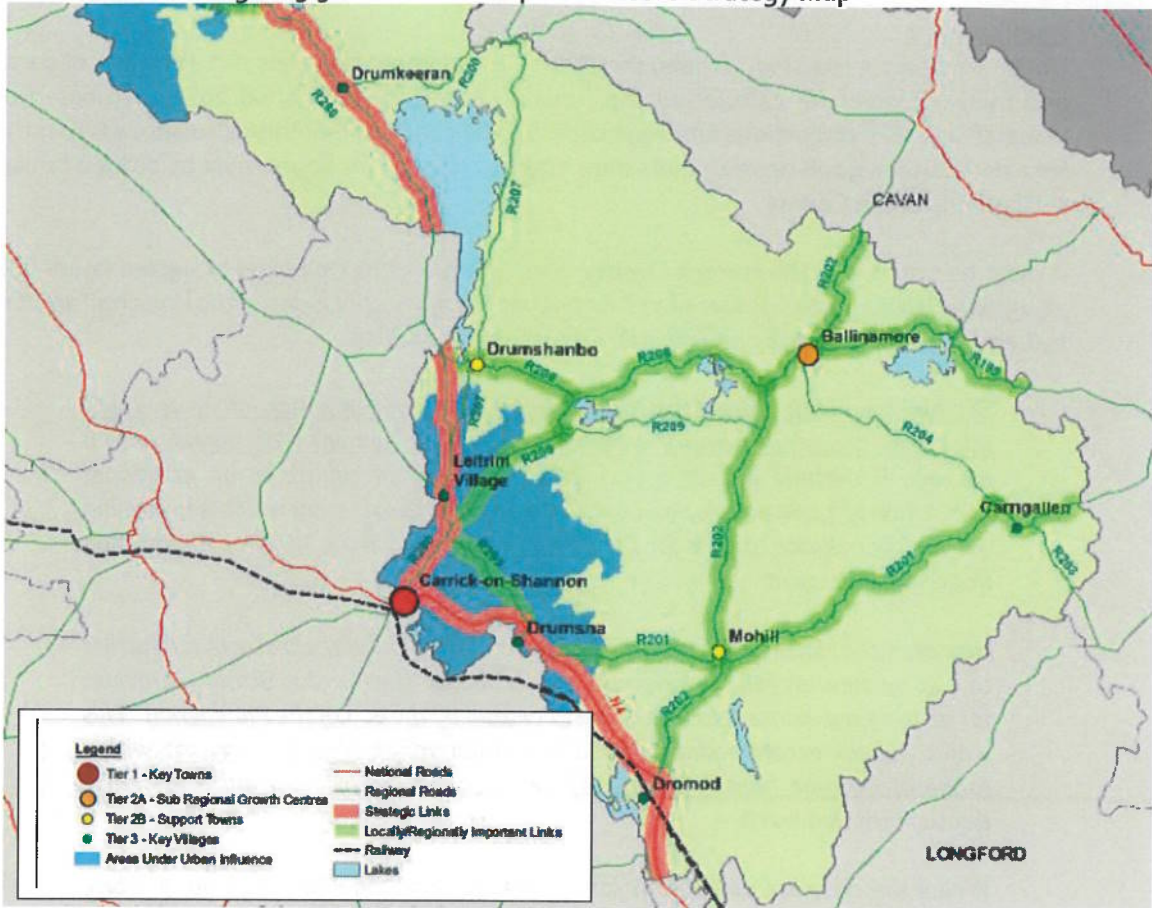
The Core Strategy is outlined in Section 2.1 of the Draft Plan:

The Core Strategy provides a medium to long-term strategy for the spatial development of Co Leitrim. It demonstrates how the Draft Plan, and in particular the Housing Strategy, is consistent with national and regional development objectives as set out in the National Planning Framework and Regional Spatial and Economic Strategy for our region and with the Specific Planning Policy Requirements specified in section 28 of the guidelines issued by the Department of Housing, Local Government and Heritage. This consistency relates to issues such as the role of settlements, the number of houses proposed in each settlement and in rural areas adhering to the targets provided in the higher-level national and regional plans or more recently by the Minister Local Government and Heritage, how the amount of land zoned for houses has been determined and is adequate to cater for this growth, demonstrate how future development support public transport/existing services, et cetera. These are then expressed in the land use zoning objectives for each settlement contained in volume 3 (Book of Maps).

Commentary

It is acknowledged that under new national and regional policy documents and direction the Leitrim Forward Planning Department must demonstrate that the proposed draft development plan and its associated settlement Hierarchy and housing projections must demonstrate consistency with the planning guidance set out in these documents.

Figure 3.3: Excerpt from Core Strategy Map



Source: Draft Leitrim Development Plan

Commentary

It is submitted that it is important to consider the location of the Tier 3 Settlements set out in the Settlement Hierarchy and their associated characteristics. Leitrim Village is situated in close proximity (6 – 7 km approx.) to the Tier 1 settlement of Carrick-on-Shannon and is designated as being within the area of urban pressure for this settlement. It is strategically placed on the road network and is also linked to Carrick on Shannon via the River Shannon.

Figure 3.4: Excerpt from NPF Population Projection

	2016	2021	2026	2031
NPF	32,000	33,500-33,750	35,000-35,500	36,000-37,000

Source: Draft Leitrim Development Plan

At least 30% of this population growth must be delivered in Carrick-on-Shannon which is designated as a Key Town in our Region within the RSES. No guidance is provided in the RSES regarding the role of the adjoining village of Cortober. For the purposes of this Development Plan, references to Carrick-on-Shannon relate to the extent of the settlement which is contained in Co. Leitrim only. The allocation of

population to the adjoining village of Cortober is a matter for Roscommon County Council noting that an allocation of 70 no, additional housing units and a population of 188 no, people are indicated for Cortober in the draft Roscommon County Development Plan 2021-2027. A Joint Local Area Plan will be prepared for the combined urban centre of Carrick-on-Shannon/Cortober as required pursuant to the RSES.

Commentary

Under Section 2.5 Housing Targets, the Draft Development then sets out a number of parameters and methodologies for calculating the housing target for the period 2023-2029 based on ESRI research and NPF projections amongst others. The conclusion of this calculations is that there will be a demand for 1,208 housing units over this period and this figure must be divided between the settlements of the County.

It must be noted that the current County population is 32,044 plus the projected figure of 1,208 = 33,252 which leaves a remainder of 248 units that is not being included in the Housing Target number by Leitrim County Council under this Draft Development Plan.

Section 4.1 of the Core Strategy outlines an agreed provision of up to 1,208 additional households over the course of the Development Plan period. At an average household size of 2.55 persons, this would equate to an additional population of 3,080 population over the plan period 2023-2029 which is in keeping with the population targets for the county as outlined in the NPF Implementation Roadmap document.

However, the Housing Strategy projects the average household size to fall further to 2.46 by the end of the Development Plan period. The Housing Strategy provides for up to 13,934 households occupied in Leitrim by the end of the Plan period. This would provide accommodation for a population range of 34,278 - 35,532 with a range of average household size of between 2.46 (projected) and 2.55 (2016 Census recorded level).

Whilst the recorded population for Carrick-on-Shannon was 4,062 no. persons, this referred to the combined urban centre of Carrick-on-Shannon and the adjoining village of Cortober, Co. Roscommon. The C.S.O. have indicated that 3,422 no. persons were recorded in Carrick-on-Shannon, Co. Leitrim with the remaining 640 no. persons recorded in Cortober, Co. Roscommon.

As part of the policy of promoting consolidation and compact growth, future growth will be concentrated in the higher tier settlements in the hierarchy. The County town of Carrick-on-Shannon is identified in the RSES as a Key Town and has capacity to accommodate significant residential and economic development at appropriate locations.

The RSES does not provide guidance as to how the Settlement Hierarchy of Co. Leitrim should be defined or the means of classifying lower order settlements below that of designated Key Towns.

Commentary

The above statement that Leitrim County Council has the appropriate flexibility to designate Leitrim Village as a 'special' Tier 3 settlement in the context of the settlement hierarchy and allow for increased residential zoning on the basis of its supporting role in the area of urban influence around Carrick-on-Shannon.

of a particular settlement. It is also important that a mix supply of private and social housing is provided.

The Programme for Government also commits to providing seed capital to Local Authorities to provide service sites to attract people to build their own homes and live in small towns and villages. These opportunities will be pursued by this Local Authority and to the policy framework contained in this development plan. Town centre living can also be supported by repurchasing suitable vacant properties and encouraging people to live in them. It is accepted that there are a number of issues that must be overcome to seek to promote town centre living, the cost of refurbishing vacant buildings, the lack of a return on investment in terms of final property value, difficulty in identifying property owners, and the need for provision of amenities and services in town centres.

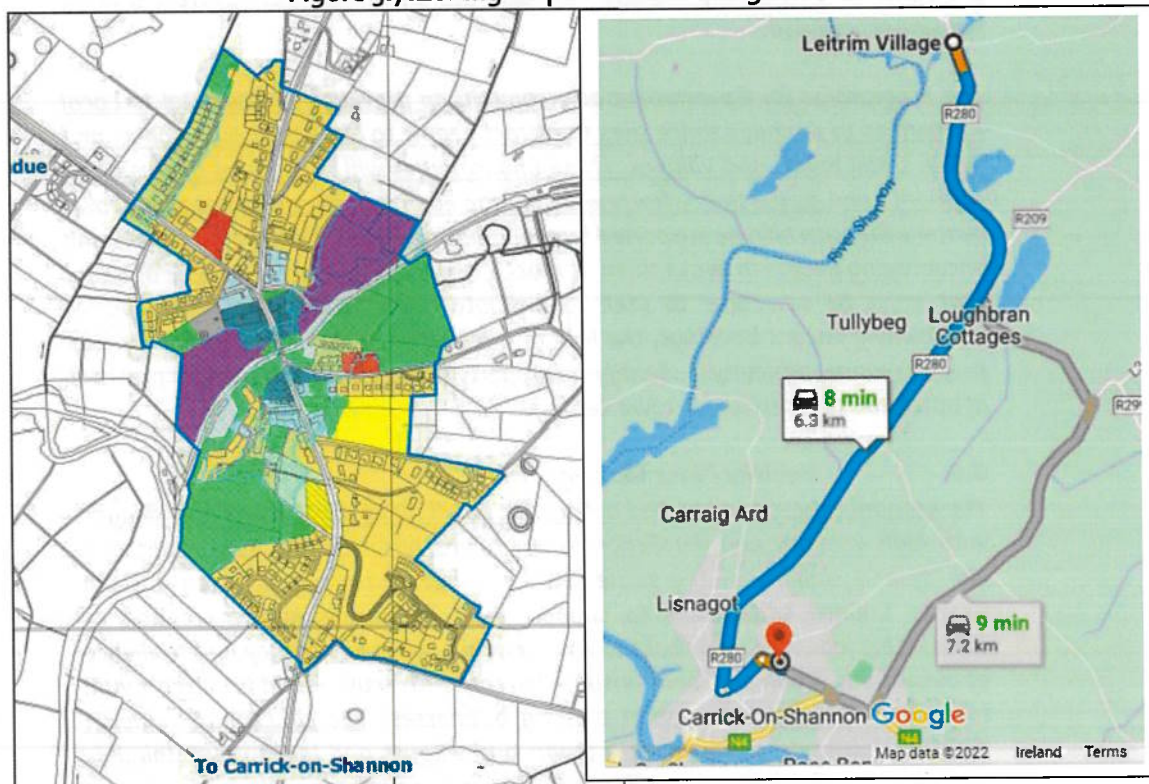
6.6 Healthy Place Making

The economic recession has had a devastating effect on rural towns and villages with high vacancy and dereliction in our towns and villages. As a result, the vitality and viability of the settlements has been adversely affected. Leitrim County Council endeavours to support local businesses in the creation of sustainable jobs that contribute to the economic growth, vibrancy and resilience of these areas. A compact and consolidated core with active street frontage is vital to ensure vibrancy and support existing businesses. The concept of compact development seeks to consolidate towns and villages and facilitate sustainable revitalisation of the area. In addition to achieving compact growth, it is important that a sense of place is created in the local environment that strengthens the connection between people and the place they live and work. This will improve the interaction people have with local amenities, create a local identity, thereby assisting in building and sustaining local community.

Leitrim County Council pursues an objective to make settlements attractive and healthy places to live with recreational amenities, services and facilities, providing quality of life, and a sense of both place and community. Place making relates to the interrelationship and connection between people and the spaces they use. It includes how people move around places, the buildings and structures as well as the open space and landscape of an area in place. It requires a people centred approach to the planning, design and management of settlements and the built environment. Healthy place making seeks to create public spaces that are vibrant. Distinctive, safe and accessible and which promote and facilitate social interaction and economic growth. The availability of, and access to, services is key to creating healthier places. This includes access to adequate housing and employment choice, supported by good healthcare and education, quality public realm and access to nature, the arts and cultural heritage. The sustainable refurbishment and redevelopment of under utilised sites in core areas will encourage town centre living and facilitate a range of additional house choices while maintaining commercial opportunities at ground level. The reuse regeneration of existing building stock within the core area, development of brownfield and gap sites and the organic development of villages will create more livable settlements that people want to live, work and spend time in as their place of choice. The council supports provision of service sites and low-density housing as an alternative to one-off houses.

PLACE POL1: To strengthen the role and function of towns and villages and facilitating development that will rejuvenate these settlements and make them attractive locations in which to live and work.

Figure 3.7: Zoning Map of Leitrim Village



Source: Draft Leitrim Development Plan & Google Earth

Commentary

Locationally, Leitrim Village is approximately 6.3 km from Carrick-on-Shannon Community School. This distance is not considered significant in an urban/suburban context and therefore it is submitted that it would be feasible for pupils living in Leitrim village to attend this school.

In essence, the example presented supports the growth of Leitrim Village as a supporting settlement in close proximity to Carrick-on-Shannon, 'Tier 1 Key Town' as a better use of land, resources and available infrastructure to allow for sustainable and consolidated growth patterns aligned with the Core Strategy.

3.2.3 Residential Housing Policy

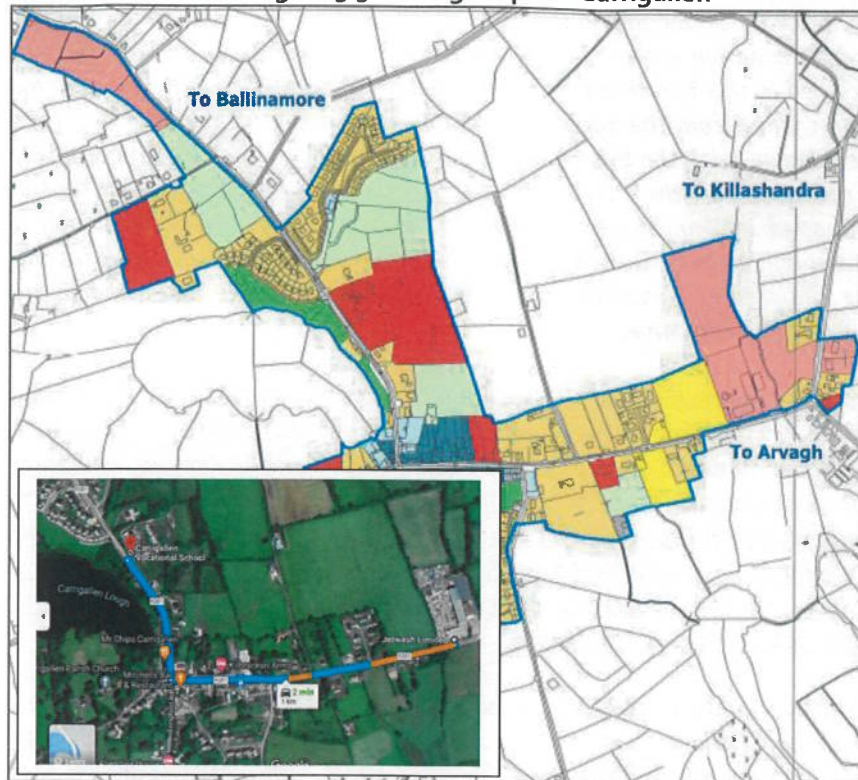
The Draft Leitrim County Development Plan contains additional statements and policy that would support the consolidation and associated 'infill development' of the subject lands.

6.5 Supporting Town Centre Living

The provision of the additional residential accommodation in rural towns and villages will be required to support the projected population increase provided for in the Core Strategy. More people and families living in, and relying on the services and facilities of, our towns and villages on a daily basis will help to fully revitalise them.

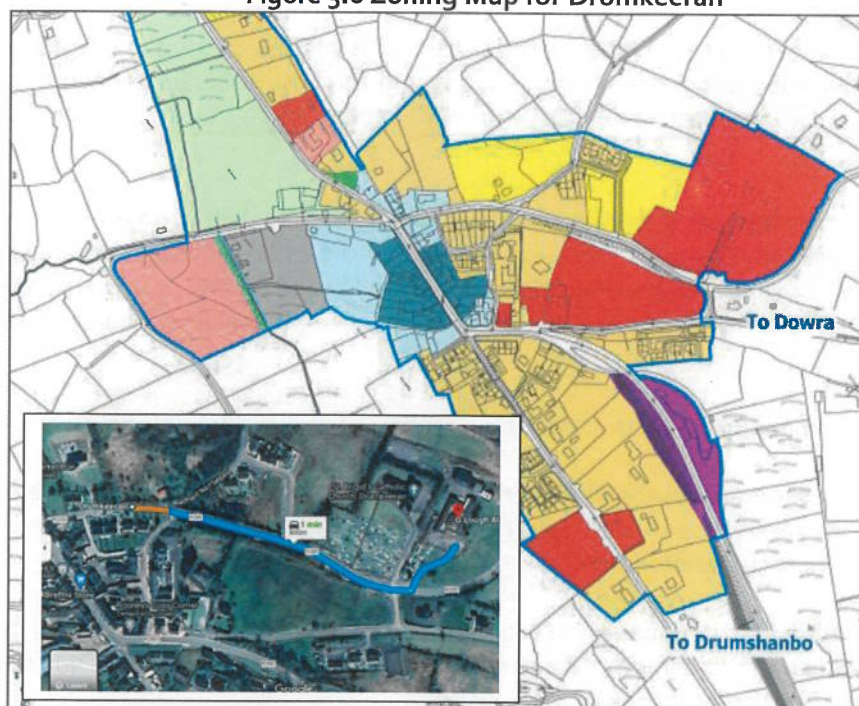
The Programme for Government commits to implementing a strategic approach to town centre regeneration and living, through a mix of new housing developments and by utilising existing buildings and unused lands for development. The scale, design and layout of housing in our rural towns and villages should be proportionate and tailored to ensure the development response to the character, scale and density

Figure 3.5 Zoning Map for Carrigallen



Source: Draft Leitrim Development Plan & Google Earth

Figure 3.6 Zoning Map for Drumkeeran



Source: Draft Leitrim Development Plan & Google Earth

Commentary

It can be seen from the maps that the proposed residentially zoned lands in Carrigallen are approximately 1km from the Vocational School. Whilst the proposed residentially zoned lands in Drumkeeran are approximately 400m from Lough Allen Secondary School. The zoning patterns of these villages are dominated by linear road layout rather than 'infill' / 'consolidation' sites.

The Tier 2B towns of Mohill, Dromahair and Drumshanbo support the Key Town of Carrick-on-Shannon and the Sub Regional Growth Centres of Manorhamilton and Ballinamore within their respective Municipal Districts. Kinlough is also included in this tier based on its population of 1,032 people (population more than trebled from the 2002. population level of 335 no. persons and thereby recorded as being the third most populous settlement in the county in 2016). It is accepted that there is a difference in the range of services and functions supported in Drumshanbo and Mohill in comparison to both Kinlough and Dromahair, both of which have become somewhat dormitory in nature owing to the influence of Bundoran and Sligo Town respectively. This is a significant challenge to overcome.

From the previous County Development Plan 2015-2021, Drumsna is moved from Tier 4 - Village to Tier 3 - Key Village because of population growth. The threshold for designation as a Key Village was having a recorded population of 220 population or more at the 2016 Census of Population. It is noted that Carrigallen and Drumkeeran both have second level schools serving their rural hinterlands. It is considered that this important educational service should be reflected in the household allocation to each centre in order to promote sustainable modes of transport to education.

To deliver at least 30% of all new homes that are targeted in Carrick-on-Shannon, Baillinamore and Manorhamilton within the existing built-up footprints on infill and/or brownfield sites with a reduced target of 20% for the remaining lower tier settlements in the Settlement Hierarchy.

Commentary

It is acknowledged that the higher tiered settlements will be allocated the largest proportion of the Housing Allocation under the housing target and this is considered to be in the interests of the proper planning and sustainable development of the County in accordance with National and Regional policy.

The above commentary identifies the Tier 2B towns of Mohill, Dromahair and Drumshanbo as supporting the Key Town of Carrick on Shannon, however it is submitted that Leitrim Village also performs a 'key' supporting role to Carrick-on-Shannon and has the potential to further consolidate residential development reducing the pressure for 'once-off' residential homes in this area of urban influence.

The above commentary elevates the status of the Tier 3 villages of Carrigallen and Drumkeeran, as;

both have second level schools serving their rural hinterlands. It is considered that this important service should be reflected in the household allocation to each centre in order to promote sustainable modes of transport to education.

It is submitted that it is beneficial to compare the location and the spatial pattern of these settlements in order to demonstrate the difference between Leitrim Village and these settlements. Each of these settlements in examined overleaf.

PLACE POL 2: *To pursue a Town Centre First approach in decision making to target available resources to deliver the best outcomes for town centres.*

PLACE POL 3: *To support the regeneration of and repopulation of town centres, through the sustainable reuse of existing buildings including the conversion of the upper floors of buildings into residential use, focusing on dereliction, the appropriate development of infill consolidation site(s), underpinned by good urban design and placemaking principles. A relaxation in development standards will be considered for such projects wherer it is sufficiently demonstrated that the development proposal will deliver high quality accommodation.*

PLACE POL 8: *To provide accessible recreational amenities.*

Commentary

The above policies would support the development of the subject lands as an infill consolidation site close to the centre of Leitrim Village. The development of these lands would seek to integrate with existing development and provide permeable links to the town centre which would encourage healthy place making and support for the town centre.

The proposed Leitrim Village Development Objective **LM 6 Support the development of a playground on land zoned Open Space & Amenity** could be incorporated within the subject lands as accessible to the village on the western fringe of the landholding, closest to the town centre which would provide for accessible recreational amenities.

3.2.4 Density Guidelines

Section 6.9 of the plan sets out policy in relation to density for the county. It states:

6.9 Density

it is not intended to prescribe maximum residential density standards in this Draft Plan. The emphasis will be on providing quality housing environments based on innovation and design led approach. A high standard of architectural design and layout will be required. The Planning Authority will seek to ensure that new developments have individuality and a sense of place, which is generated by the interaction between the physical characteristics and features of the site and its surroundings and the layout, landscaping and design of the new housing.

DENSITY POL 1 *To promote development at sustainable and appropriate densities that support compact growth and the consolidation of urban areas..*

Commentary

The proposed densities for development in Leitrim Village have been set at 15 units per hectare and 10 units per hectare respectfully. It is suggested that these densities could be considered as very low and associated with an 'approach' to towns and villages.

It is respectfully submitted that an 'infill site' such as the land proposed for zoning in this submission would be capable of catering for higher density of development, given their central location in the settlement and their proximity to services via sustainable modes of transport.

It is therefore submitted that an appropriate density range as attributable to the *Ministerial Guidelines 19: Sustainable Residential Development* of between 15 – 30 units per hectare could be considered on its merits as associated with proximity to the village, walking accessibility and available infrastructure. It is further submitted that such an increased density of development would

be in accordance with **DENSITY POL 1** which seeks to support compact growth and the consolidation of urban areas.

3.2.5 Leitrim Village Plan Policy

The policies below are specifically listed in the section of the Draft Development Plan that deals with Leitrim Village:

Leitrim Development Objectives

LM 1 *Support the further consolidation of housing in the village with the development of serviced infill opportunities.*

LM 6 *Support the development of a playground on land zoned Open Space & Amenity.*

LM 8 *Ensure applications for development on lands identified as flood risk areas, shall be subject to a Specific Flood Risk Assessment and Justification Test, in accordance with the Planning System and Flood Risk Management – Guidelines for Planning Authorities (2009), or any superseding guidelines and circulars.*

Commentary

It is submitted that the local planning policy specific to Leitrim Village also supports the consolidation of the settlement by the development of infill opportunity sites. It is submitted that the lands that are the subject of this submission demonstrate the location and criteria to warrant a residential zoning in order to allow the achievement of these local development objectives.

3.3 National Policy – National Planning Framework

What is the National Planning Framework?

It is a national document that will guide at a high-level strategic planning and development for the country over the next 20+ years, so that as the population grows, that growth is sustainable (in economic, social and environmental terms).

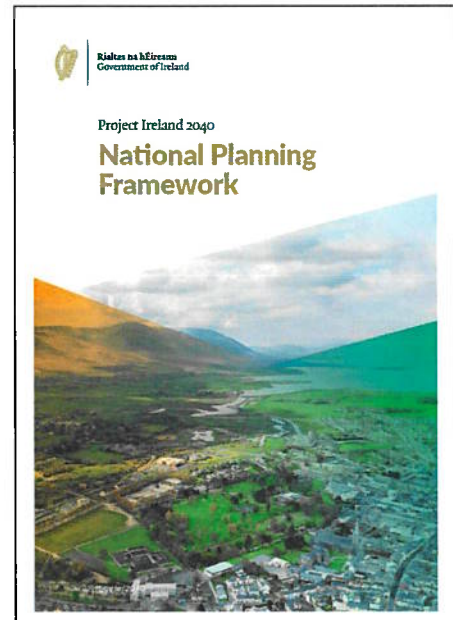
The NPF with the National Development Plan will also set the context for each of Ireland's three regional assemblies to develop their Regional Spatial and Economic Strategies taking account of and co-ordinating local authority County and City Development Plans in a manner that will ensure national, regional and local plans align.

The National Planning Framework Vision

The vision set out under this Framework is based on a set of values that will ensure Ireland's long term economic, environmental and social progress for all parts of our country In framing a new way forward the National Planning Framework draws upon lessons learned from the National Spatial Strategy and highlights a vision of success based on better choices compared to a 'business as usual' approach.

Objectives of the National Planning Framework

The ultimate objectives of the NPF are to:



- *Guide the future development of Ireland, taking into account a projected 1 million increase in our population, the need to create 660,000 additional jobs to achieve full employment and a need for 550,000 more homes by 2040;*
- *Of the 1 million extra people, 25% is planned for Dublin, recognised as our key international and global city of scale and principal economic driver, 25% across the other four cities combined (Cork, Limerick, Galway and Waterford), enabling all four to grow their population and jobs by 50-60%, and become cities of greater scale, i.e. growing by twice as much as they did over the previous 25 years to 2016, and*
- *with the remaining 50% of growth to occur in key regional centres, towns, villages and rural areas, to be determined in the forthcoming regional plans - Regional Spatial and Economic Strategies (RSEs)*
- *Enable people to live closer to where they work, moving away from the current unsustainable trends of increased commuting;*
- *Regenerate rural Ireland by promoting environmentally sustainable growth patterns;*
 - *Plan for and implement a better distribution of regional growth, in terms of jobs and prosperity;*
 - *Co-ordinate delivery of infrastructure and services in tandem with growth, through joined-up NPF/National Investment Plan and consistent sectoral plans, which will help to manage this growth and tackle congestion and quality of life issues in Dublin and elsewhere.*

Chapter 5: Planning for Diverse Rural Places

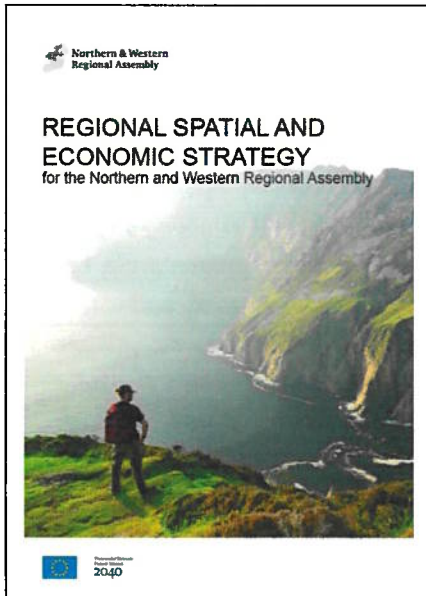
National Policy Objective 15: *Support the sustainable development of rural areas by encouraging growth and arresting decline in areas that have experienced low population growth or decline in recent decades and by managing the growth of areas that are under strong urban influence to avoid over-development, while sustaining vibrant rural communities.*

National Policy Objective 16: *Target the reversal of rural decline in the core of small towns and villages through sustainable targeted measures that address vacant premises and deliver sustainable reuse and regeneration outcomes.*

National Policy Objective 18a: *To support the proportionate growth of and appropriately designed development in rural towns that will contribute to their regeneration and renewal, including interventions in the public realm, the provision of amenities, the acquisition of sites and the provision of services.*

National Policy Objective 18b:

Develop a programme for 'new homes in small towns and villages' with local authorities, public infrastructure agencies such as Irish Water and local communities to provide serviced sites with appropriate infrastructure to attract people to build their own homes and live in small towns and villages.



Key future Planning and Development and Place-Making Policy priorities for the Northern and Western Region include:

More effective strategic planning and co-ordination of the future development of nationally and regionally strategic places, including points straddling boundaries with neighbouring regions, like Athlone and Letterkenny which are focal points for large geographical areas reaching into much of this and neighbouring regions. In economic and employment, transport, education and public service delivery and retailing terms.

REGIONAL POLICY OBJECTIVES:

RPO 3.4 *To support the regeneration and renewal of small towns and villages in rural areas.*

RPO 7.20 *Increase population living within settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, in-fill development schemes, area or site-based regeneration, service site provision and increased building heights appropriate to the settlement, together with infrastructure provision.*

Commentary

The availability of services to the subject lands make them a sequential site for infill development which would contribute to the regeneration of Leitrim Village whilst also contributing to regeneration and sustainable growth patterns by offering alternatives to once-off rural housing in line and in keeping with National and Regional Planning Policy Objectives.

3.4 Ministerial Guidelines – Draft Development Plan Guidelines for Planning Authorities 2021

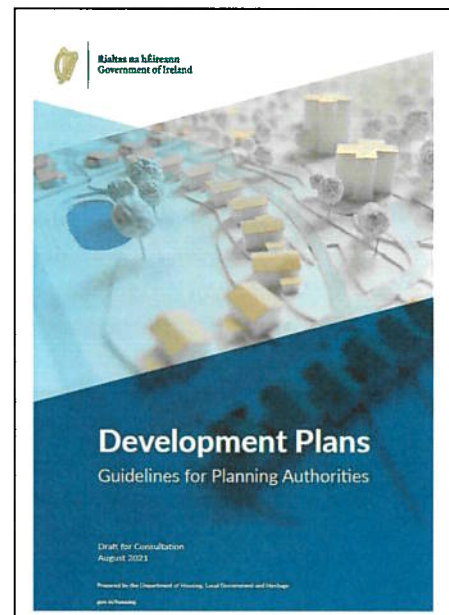
1. Purpose of the Development Plan

1.1 The Purpose of the Development Plan in the Planning System

Within the Irish planning system, the county or city development plan is the principal planning strategy document for the development of a local authority area over the six year statutory time period of the plan. The development plan gives spatial expression to the physical, economic, social and environmental needs of the community, in order to support and regulate new development, enhance valued assets and amenities and protect the environment.

4.4.1 Land/Sites Already Zoned

The development plan review process is an opportunity to take stock of land already zoned for residential purposes or a mixture of residential and other uses. This must be set out in the plan core strategy. It is critical to note that Section 10(8) of the Planning Act makes it clear that there is no presumption in law that land zoned for any purpose in a development plan shall remain so zoned in any subsequent development plan.



Land and sites already zoned for residential purposes may be regarded as providing a baseline, or starting point to meet projected population and housing targets, especially in cases where planning permission has already been granted, based on the presumption that land subject to planning permission is already serviced or serviceable.

Should it be the case that there is a surplus of well-located zoned and fully serviced land to meet population and housing supply targets already zoned for development in any local authority area when reviewing a development plan, it is recommended that a phased approach be taken to prioritise and rank the preferred sequence of development of such sites.

However, in cases where land is zoned and has remained undeveloped and unserviced through one or more development plan cycles, with no prospect of being serviced within the six-year life of the development plan that is under preparation, alternative approaches must be considered:- (i) alternative zoning objectives or (ii) discontinuing the objective (See Appendix A).

4.4.2 Land/Sites Proposed to be Zoned

It is not the purpose of the planning system and the development plan process to facilitate the hoarding and speculation of serviced development land. However, it is recognised that there is a need for some degree of competition and choice in the residential development land market.

Accordingly, in considering whether to zone additional new land and sites for residential (or a mixture of residential and other uses) to meet housing need, planning authorities must ensure that the development plan core strategy makes adequate provision for zoned and serviced sites that will come forward during the six-year life of the development plan, while also considering and factoring in the proportion of projected housing need to be met on unzoned land in rural areas.

4.4.3 Ensuring Sufficient Provision of Housing Lands/Sites

In providing housing sites for development within settlements, it may be necessary to zone more serviced land and sites for residential (or a mixture of residential and other uses), than would equate to meeting precisely the projected housing demand for that settlement. This approach recognises that a degree of choice in development sites to be provided locally is desirable to avoid restricting the supply of new housing development through inactivity on a particular landholding or site.

In making provision for housing within settlements in the core strategy of a development plan, in certain instances a planning authority may therefore provide zoned residential sites in addition to those required to meet the settlement housing supply target. This means that a planning authority, after identifying the site/land requirements to meet the housing supply target for that settlement, may also identify additional sites/lands to ensure sufficient choice for development potential is safeguarded.

Commentary

It is respectfully submitted that there is a requirement in the instant case and notwithstanding the fact that Leitrim Village may be considered a Key Supporting Village to a Tier 1 Key Town (Carrick-on-Shannon) adequate additional available zoned residential lands provides the requisite flexibility to provide a degree of choice by extending plan zonings accordingly and where existing zonings provide the baseline for meeting housing targets.

3.5 Rebuilding Ireland 2016

Designed to accelerate housing supply in this country, **Rebuilding Ireland** is tackling our country's housing shortage. This action-driven plan will result in a dramatic increase in the delivery of homes nationwide. Ambitious and imaginative in its reach, and radical in its approach, this plan will address the needs of homeless people and families in emergency accommodation, accelerate the provision of social housing, deliver more housing, utilise vacant homes and improve the rental sector.

A significant priority for the Government, this innovative and future-facing plan of action ranges across financing measures, better use of existing homes, new construction and rental sector improvements, while effective methods for delivering on the plan's stated ambitions will also be refined.



"We are on a mission to ensure that everyone can access a home, either with support from the State or from their own resources. This is a major priority for the Government and we are determined to deal with the dramatic under supply of housing and the effect it has on people and communities. This is an action-driven focused plan with substance committed to a major increase in delivery of homes year on year to 2021" - Simon Coveney TD - Minister for Housing, Planning, Community and Local Government

The actions proposed under each of these five pillars can be summarised as follows:

Pillar 1 – Address Homelessness - Provide early solutions to address the unacceptable level of families in emergency accommodation; deliver inter-agency supports for people who are currently homeless, with a particular emphasis on minimising the incidence of rough sleeping, and enhance State supports to keep people in their own homes.

Pillar 2 – Accelerate Social Housing - Increase the level and speed of delivery of social housing and other State-supported housing.

Pillar 3 – Build More Homes - Increase the output of private housing to meet demand at affordable prices.

Pillar 4 – Improve the Rental Sector - Address the obstacles to greater private rented sector delivery, to improve the supply of units at affordable rents.

Pillar 5 – Utilise Existing Housing - Ensure that existing housing stock is used to the maximum degree possible - focusing on measures to use vacant stock to renew urban and rural areas

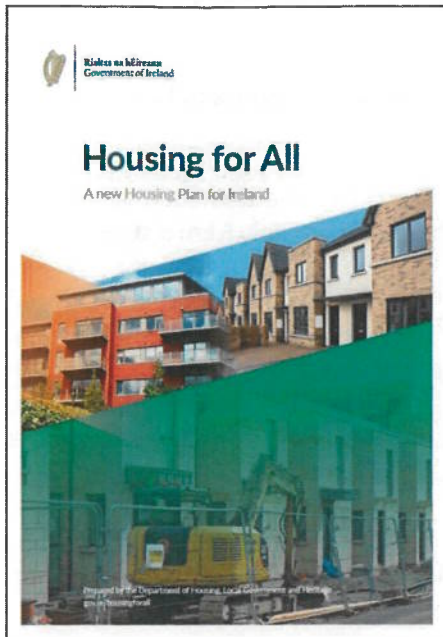
Many of these actions are inter-related and inter-dependent. In outlining the actions, this Action Plan contains key targets and deadlines for delivery by a number of Government Departments, local authorities and other bodies which will be subject to regular Cabinet Committee review.

Pillar 3: Build More Homes - Planning Reforms

The planning process has a major role to play in providing a clear path to meeting the housing needs of citizens and giving certainty for the providers of that housing. The Government is determined to see the planning process building on recent enhancements

and becoming more responsive to the requirements and complexities around housing delivery.

3.6 *Housing for All - A New Housing Plan for Ireland*



Right now, Ireland's housing system is not meeting the needs of enough of our people.

- *There are not enough houses to buy or rent in the private sector.*
- *There are not enough houses being built by the State for those who need social housing.*
- *Housing has become increasingly unaffordable for the 'squeezed middle' who would once have expected to be able to purchase their own home.*
- *Too many people are experiencing homelessness or are unable to access appropriate housing.*
- *The cost of building housing is too high.*
- *Too much vacant housing stock remains unused.*
- *Our housing stock needs to be more environmentally friendly.*

Underpinned by commitments in the Programme for Government, over the last year the Government has taken ambitious action to address these issues while developing

the Housing for All Plan. These measures have ranged from new affordability measures to enhancing social housing delivery.

Commentary

It is respectfully presented that national policy objectives and ministerial guidelines on housing provision are more closely aligned to ensuring a continuity of supply and provision, providing wider choices facilitates greater economies of scale and more chances of delivery. The subject lands represent a plan led response to housing delivery to ensure that opportunities are presented in the right location to support housing provision in line with sustainable development objectives in line with supporting infrastructural provision.

4.0 JUSTIFICATION FOR INCREASED INFILL RESIDENTIAL ZONING IN LEITRIM VILLAGE

We herein respectfully present that on foot of the review of the existing lands, its respective location and with full consideration of national, regional and local plan policy and spatial planning objectives that the subject lands identified at Figure 5.2 can present a 'new residential' zoning.

4.1 Leitrim Village acts in a supporting role to Carrick on Shannon due to its proximity and links to the town.

It has been demonstrated in this submission that Leitrim Village is a Tier 3 Settlement that supports the Tier 1 Settlement of Carrick on Shannon (Key Town) which is approximately 6 km distance away.

The village is linked to Carrick on Shannon by both road and river, the latter being extensively used for tourist purposes. Leitrim Village is situated within the area of urban influence for the principal County Town highlighted on the Core Strategy map. It is submitted that these locational characteristics make the settlement significantly different from other Tier 3 Settlements in the County and present a reasoned and evidenced based approach to reconsider its housing allocations for the 2023-2029 Plan period.

4.2 Leitrim Village offers better opportunities for consolidation and infill development than Drumkeeran or Carrigallen, due to its location and the quantum of land available.

The lands available for development in Leitrim Village are situated in an area that allow for improved consolidation of the village. It is clear when comparing the Village Development footprint to other settlements in the County that there is a clear area to be 'infilled' formed by the subject lands.

This gives Leitrim Village a spatial advantage over the linear and more dispersed settlements of Drumkeeran and Carrigallen. This approach to development is endorsed by the planning policy set out for both the village and the county.

4.3 The surrounding lands to the Leitrim Village sites offer opportunities for integration, permeability and community development in the settlement.

There is residential development to the north in Church View and residential development to the south in Riversdale, with multiple opportunities for pedestrian and road links offering increased permeability to this residential community removing the linear nature of development to the east of the Main Street.

The entire site is adjacent to McCormacks Service Station and Shop which acts as a neighbourhood centre and would serve to reduce short car based trips due to its walkable distance from the named estates and the subject lands.

4.4 The available lands in Leitrim Village are not flood prone as they are located on a hill

The proposed Leitrim Village Plan contained in Volume II of the Draft Development Plan highlighted that as a result of recent flood studies that the potential use of waterside lands in the town had been reduced.

Whilst it is acknowledged that the western portion of the subject lands have been designated as being at flood risk, we wish to highlight that the majority of the lands proposed for zoning are on significantly higher ground and not susceptible to flooding.

Any future potential development can be further proofed by a 'Site Specific Flood Risk Assessment' and to present that the zoning of the lands would not pose a threat to surrounding or future occupants in terms of flooding.

4.5 The subject lands can support an increased density and this issue is also important to the feasibility of the development of the site.

The proposed densities for development in Leitrim Village have been set at 15 units per hectare and 10 units per hectare respectively. It is respectfully suggested that these densities are low and are more appropriate at the approach to towns and villages.

It is respectfully submitted that an 'infill site' such as the land proposed for zoning in this submission would be capable of catering for a more flexible or fluid density as could accommodate densities as defines within Ministerial Guidelines for Sustainable Residential Development in or around 15-30 units per hectare. This can be further endorsed by the lands central location in the settlement and their proximity to services via sustainable modes of transport.

The density issue combined with the location of lands is also considered critical as to whether a viable, saleable housing scheme can be financed, constructed and sold in the current market. This is commented on further below.

4.6 Due to the changing nature of the construction industry and the increased costs involved, it is considered more likely for a builder to deliver quantum of houses in this high cost market as opposed to the smaller pockets of lands zoned in the lower tier settlements

It is considered that the profit margins associated with once-off or small infill housing schemes (1-10) have been severely eroded in recent years due to substantial increased material costs and increases in other construction overheads.

While the allocation of new residential lands between Tier 3 and Tier 4 settlements has been carried out in a fair and proper way in accordance with national and regional planning policy, it is questionable if any of the smaller plots of land are viable from a developer viewpoint in the current market and over the next six years.

It is submitted that the subject lands offer a more viable prospect for the rural developer who could aim to cater for residents of the expanding village and re-direct those seeking once-off houses in the vicinity of Leitrim Village and Carrick-on-Shannon.

In effect, *Cluster Rural Housing Schemes* also present a viable alternative to once-off housing as a sustainable form of development as part of the offer of increasing availability of residential zoned lands in the village.

4.7 Leitrim Village has adequate service capacity to cater for this quantum of development and this should be used.

The Leitrim Village Development Plan states that the village has service capacity to cater for increased residential development. Many similar sized Irish villages are currently prevented from

residential expansion due to capacity issues with Wastewater Treatment Plants. It is therefore submitted that if adequate capacity exists within the timeframe of the Draft Development Plan 2023-2029 then it should be availed of.

4.8 The population allocation for the County has not been fully allocated in the Draft Development Plan 2023-2029

In the event that the Planning Authority are not minded to change the housing allocation to the Tier 3 settlements in the County, it is submitted that Leitrim Village could favourably benefit from a proportion the extra 248 units not drawn down in the Housing Target Figure as set out above in Section 3.2, 1208 out of 1500. These figures may not even allow for typical "headroom" calculations to provide an additional 50% to ensure targets are met in a timely fashion.

5.0. PROPOSED ZONING OBJECTIVE FOR THE DRAFT DEVELOPMENT PLAN 2023-2029

The landowner Charles Donnellan, welcomes and endorses the proposed 'New Residential' zoning as indicated in 'yellow' on the Draft Village Plan for Leitrim. However, this submission further suggests an increased 'New Residential' zoning to mirror the former 'Residential Reserve' land allocation to the *Draft Leitrim Village Plan 2023-2029*.

Figure 5.1 – Identifying Additional Available Lands for New Residential



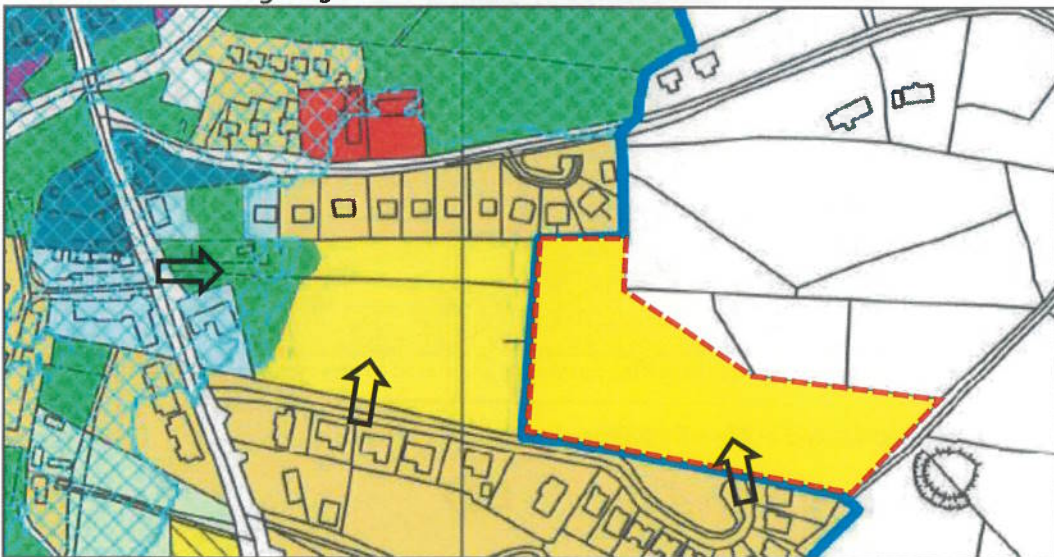
Source: Leitrim Development Plan 2023-2029 annotated by The Planning Partnership

KEY:

Lands Previously Zoned Residential Reserve as supports extended 'new residential' zoning



Figure 5.2 PROPOSED ZONING AS NEW RESIDENTIAL



Source: Leitrim Development Plan 2023-2029 annotated by The Planning Partnership

KEY:

Lands Proposed Zoning as New Residential



Indication of Potential Access Routes



6.0 CONCLUDING COMMENTARY

It is submitted that this document demonstrates that the Tier 3 Settlement of Leitrim Village has different characteristics than the other settlements in the Tier 3 Category, namely the close supporting function to the 'Key Town' of Carrick-on-Shannon within the Co. Leitrim Settlement Hierarchy.

The spatial layout of the village and the 'infill' nature of the subject lands is very much apparent when the geographical and spatial layout of the Tier 3 Settlements are compared.

This issue coupled with Leitrim Village's close proximity to the Tier 1 Town of Carrick-on-Shannon increases the range of services available to it, compared to the other Tier 3 Settlements, and further allows it to support the Tier 1 settlement by deflecting pressure for unsustainable 'once-off' housing development into an already serviced settlement.

This type of effective strategic planning is endorsed and advocated by the National Planning Framework and the Regional Spatial and Economic Strategy for the area, and policies that support this approach have been highlighted in this submission.

The incorporation of an identified playground on the subject lands for use by the wider community is welcomed and will enhance any proposed development as well as contributing to the recreational wellbeing of the wider community.



Source: Leitrim Development Plan 2023-2029 annotated by The Planning Partnership

KEY:

Lands Proposed Zoning as New Residential

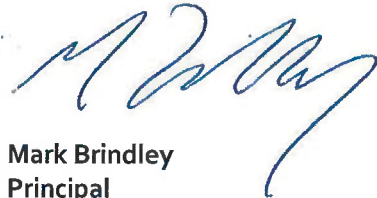
Indication of Potential Access Routes

We therefore request that Leitrim County Council in addition to the proposed new residential zoning contained within the Draft Leitrim Village Plan apply a 'new residential' zoning objective to the outlined (dashed red) portion of our clients landholding at Tullylannan; shown unzoned in the draft Development Plan and as highlighted in this submission (Figure 5.2) in order to enable and facilitate appropriate housing land supply to allow the development of a consolidated settlement during the life of the proposed Leitrim County Development Plan.

The site is strategically located in proximity to the village centre of Leitrim Village, and due to this can facilitate an additional residential development designed to integrate with the existing development around it and further enhance the community in this settlement.

We look forward to your consideration of same and trust if there are any outstanding items you might refer back to ourselves.

Yours sincerely



Mark Brindley
Principal
The Planning Partnership

