



DRAFT LEITRIM COUNTY DEVELOPMENT PLAN 2023 - 2029
CHIEF EXECUTIVES REPORT ON SUBMISSIONS TO DRAFT PLAN



Comhairle Chontae Liatroma
Leitrim County Council

Chief Executive's Report on Draft Plan Submissions



I, Lar Power, Chief Executive of Leitrim County Council issue this Chief Executive's Report to the Elected Members of Leitrim County Council for your consideration. Its purpose is to report on the outcome of the statutory consultation process to the Draft Leitrim County Development Plan 2023-2029, as prescribed in Section 12(4)(a) of the Planning and Development Act 2000, as amended.

In accordance with legislation, this report lists the persons or bodies who made submissions or observations to the proposal and provides a summary of the issues raised in the 209 no. submissions or observations made in relation to the Draft Leitrim County Development Plan 2023-2029. This includes the submission received by the Office of the Planning Regulator and by the Northern & Western Regional Assembly. The report sets out my response to the issues raised and recommends a series of alterations to the Draft Plan.

The submission of this report to you for your consideration marks another important step in the formulation of a new County Development Plan for the period 2023-2029.

Lar Power

Lar Power,
Chief Executive, Leitrim County Council

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APPENDIX 1 – LIST OF SUBMISSIONS RECEIVED

APPENDIX 2 – COPY OF REPORT TITLED: *LANDSCAPE CAPACITY STUDY FOR COMMERCIAL FORESTRY - CO. LEITRIM (MARCH 2022)*

SECTION 1
INTRODUCTION



1 INTRODUCTION

In accordance with Section 12 of the Planning and Development Act 2000, as amended, hereafter referred to as the "Act", the publication of the Draft Leitrim County Development Plan 2023-2029 on Friday the 11th of February 2022 marked the commencement of a public consultation period of over 10 weeks. During this period, submissions and observations on the content of the Draft Plan were invited from prescribed bodies, stakeholders and the general public which are to be taken into consideration before the making of the Plan by the Elected Members. The Act requires the Chief Executive to prepare a report on any submissions or observations received by Leitrim County Council during the consultation period of the Draft Plan. Accordingly, this document forms the Chief Executive's Report on the submissions and observations received by the Council in relation to the Draft Leitrim County Development Plan 2023-2029 during the stated public consultation period. A number of submissions and observations were received after the closing date of 27th April last and these are not included in this report.

This report provides a summary of the various issues raised in the submissions and observations received in relation to the Draft Plan and outlines the respective responses and recommendations of the Chief Executive to same.

This Chief Executive's Report is recognised as a key document in the overall plan making process and is a key consideration for the Elected Members in deciding whether the Draft Plan should be accepted or amended.

1.1 Legislative Context of Report

Under subsection 12(4)(a) of the Act, the Chief Executive shall prepare a report on any submissions or observations received by the Planning Authority during the public consultation period of the Draft Plan, which is statutorily required to be a period of not less than 10 weeks following publication of the notice of the preparation of the Draft Plan. Subsection 12(4)(b) of the Act prescribes the content of the Chief Executive's Report which includes the following:

- A list of persons or bodies who made submissions or observations;
- A summary of the recommendations, submissions and observations made by the Office of the Planning Regulator (OPR);
- A summary of the issues raised and recommendations made by the North Western Regional Authority (NWRA) and an outline of the recommendations of the Chief Executive in relation to the manner in which those issues and recommendations should be addressed in the Draft Plan;
- A summary of the submissions and observations made by any other persons in relation to the Draft Plan; and
- The response of the Chief Executive to the issues raised, taking into account any directions from the Elected Members, the proper planning and sustainable development of the area, the statutory obligations of the Council and any relevant policies or objectives of the Government or of any Minister of the Government.



1.2 Structure of Report

Following this Introduction, the structure of this report is as follows:

- **Section 2** – Overview of the public consultation process undertaken with respect to the Draft Plan and an outline of the next steps and anticipated timelines in the overall plan making process.
- **Section 3** – Chief Executive summary, responses and recommendations to the submission from the Office of the Planning Regulator (OPR), thereby fulfilling the legislative requirements of subsection 12(4)(ba) of the Act.
- **Section 4** – Chief Executive summary, responses and recommendations to the submission from the Northern and Western Regional Assembly (NWRA), thereby fulfilling the legislative requirements of subsection 12(4)(bc) of the Act.
- **Section 5** – Chief Executive summary, response and recommendations to submissions received from prescribed bodies.
- **Section 6** - Chief Executive summary, responses and recommendations to submissions received from other stakeholders and the general public.
- **Section 7** – Chief Executive summary, responses and recommendations to submissions relating to land use zoning objectives provided in the Draft Plan.

The items raised in the submissions of the OPR, the NWRA and the prescribed bodies are addressed individually in terms of a specific response and recommendation. In relation to the submissions from other stakeholders and the general public, as addressed in Section 6, such submissions are collated and addressed according to theme, for example, gold mining development, forestry or renewable energy development, etc. given the commonality of the issues raised in submissions relating to such themes. In adopting this approach, the report negates the need for the unnecessary proliferation and replication of identical responses and recommendations to the same items raised in the individual submissions, resulting in a more concise and coherent report that comprehensively addresses such themes.

Similarly, in recognition of the fact that there a number of cross-cutting themes contained within the Draft Plan and the need to reduce repetition, where a relevant recommendation has previously been given in an earlier submission, reference to such a recommendation shall be made in any relevant subsequent submission which addresses the same issue.

Where changes to the Draft Plan text are recommended on foot of recommendations contained within this report, these are displayed in the following format for ease of reference:

- Proposed omissions to the text of the Draft Plan are denoted using ~~strikethrough~~.
- Any proposed amended or additional text to the Draft Plan is indicated in **red** font.

1.3 Next Steps of Plan Making Process

Under subsection 12(5) of the Act, following receipt of this Chief Executive's Report, the members are required to consider the Draft Plan and the Chief Executive's Report. Such consideration must be completed within 12 weeks, within which the members may accept or amend the Draft Plan. Where Elected Members pass a resolution to materially amend the Draft Plan, the Material Amendments to the Draft Plan must go on public display for a period of not less than 4 weeks, under subsection 12(7), with interested parties given an opportunity to make submissions and observations in relation to the proposed Material Amendments only. This public consultation is then followed by the preparation of

a Chief Executive’s Report on any submissions or observations received in relation to the proposed Material Amendments, which will contain the responses and recommendations of the Chief Executive.

The Elected Members may then make the Development Plan with or without the proposed Material Amendments or with modifications to the proposed Material Amendments. It should be noted that at this stage of the process, any further modification of a proposed Material Amendment can only be made where it is minor in nature and not likely to have a significant effect on the environment or adversely affect the integrity of a European designated site. No further changes to increase the amount of land zoned for a particular purpose and no further additions or deletions to the Record of Protected Structures can be made at this stage.

Upon the final resolution of the Elected Members to make the Development Plan, the Planning Authority is required to notify the Office of the Planning Regulator (OPR) within 5 working days of making the Plan, as per subsection 31AM(6) of the Act. Moreover, in the event that the Planning Authority decides in the making of the Plan not to comply with a recommendation set out in the submission of the OPR, or to make the Plan in a manner which is inconsistent with any recommendation from the OPR, the Chief Executive is obliged to formally notify the OPR of this in writing and provide reasons for such a decision.

Table 1 sets out the anticipated key dates for the next steps in the Plan making process. Whilst these key dates are based on the maximum statutorily allocated time under the Act, some steps may be concluded within shorter timeframes. Where this is practical and achievable, dates will be adjusted accordingly, in order to achieve the benefits of an adopted Development Plan in advance of the maximum final date in March 2023.

Table 1.1: Anticipated Timeline for the Next Steps in the Plan Making Process

Step	Anticipated Timeline
Chief Executive’s Report on submissions or observations received on the Draft Plan	Week ending 24 th July 2022
Elected members decide to accept or amend Draft Plan	Week ending 16 th October 2022
Public consultation on Proposed Material Amendments to the Draft Plan begins	Week ending 6 th November 2022
Public consultation on Proposed Material Amendments to the Draft Plan ends	Week ending 4 th December 2022
Chief Executive’s Report on submissions or observations received on the proposed Material Amendments to the Draft Plan	Week ending 23 rd December 2022
Elected members decide, by resolution, to make/adopt the Development Plan	Week ending 12 th February 2023
Planning Authority notifies the OPR of the adopted Development Plan	Week ending 19 th February 2023
Adopted Development Plan comes into effect	Week ending 26 th March 2023

SECTION 2
OVERVIEW OF PUBLIC
CONSULTATION
UNDERTAKEN



2 OVERVIEW OF PUBLIC CONSULTATION UNDERTAKEN

2.1 Preliminary Consultation Process – Pre-Draft Plan

The process of reviewing the Leitrim County Development Plan 2015-2021 and the preparation of a new Development Plan commenced with the Pre-Draft public consultation stage and publication of a Strategic Issues Paper which framed the key strategic issues for the future development of the county. The Pre-Draft consultation took place from the 17th of June 2020 until the 12th of August 2020 (inclusive), with a total of 45 written submissions being received during the consultation.

The Pre-Draft submissions were summarised and responded to in a Chief Executive's Report, with recommendations contained within the report for Elected Members where relevant. The report was considered by the Elected Members at a Special Meeting held on the 7th of December 2020 with no directions issued by the Elected Members to the Chief Executive with regard to the content of the Draft Plan.

2.2 Draft Leitrim County Development Plan 2023-2029

The preparation of the Draft Leitrim County Development Plan 2023-2029 was severely disrupted by the various restrictions arising from the Covid-19 pandemic, particularly during the early stages of the preparation of the Draft Plan where depleted department resources were required to respond to more immediate statutory deadlines associated with the development management and enforcement functions of the Planning Authority. Moreover, the restrictions also had a significant impact on external consultancy work associated with the preparation of the Draft Plan, particularly in relation to appointed consultants who were dependant on undertaking required surveys and site inspections which were severely hampered by the Covid-19 pandemic travel restrictions which were in place in 2020 and 2021.

In response to the disruption caused by the restrictions on the planning system and the preparation of development plans, the Planning and Development (Amendment) Act 2021 was enacted in July 2021 to provide a mechanism for Planning Authorities to avail of an extension to their development plan review processes and, simultaneously, an extension to the duration of the existing development plan for a period not exceeding one year. In this regard, Elected Members will be aware that the Council has resolved to extend the duration of the review of the Leitrim County Development Plan 2015-2021 (as varied) up to the 31st of March 2023 at a meeting of the Council on the 7th of July 2022.

Notwithstanding the legislative and timeline changes associated with the review process outlined above, a working draft of the Draft Leitrim County Development Plan 2023-2029 was prepared and circulated to Elected Members on the 26th of November 2021 and was considered by the Elected Members through a series of six workshops held between December 2021 and January 2022. The Draft Plan was formally submitted for the consideration of Elected Members at a Special Meeting of the Council held on the 24th of January 2022 where the Elected Members approved by resolution the Draft Plan, subject to amendments.

As per the provisions of the Planning and Development Act 2000, as amended, the Council issued a statutory notice in the Leitrim Observer (published on the 9th of February 2022) informing the public that from the 11th of February 2022 to the 27th of April 2022 (over 10 weeks), the Draft Plan and accompanying Strategic Environmental Assessment (SEA) Environment Report, Appropriate Assessment (AA) Natura Impact Report, Strategic Flood Risk Assessment (SFRA) would be:



- Available for public inspection at the Council's Planning Department and in Public Libraries in Ballinamore and Manorhamilton.
- Available for public inspection online at Leitrim County Council branch libraries in Carrick-on-Shannon, Carrigallen, Drumshanbo and Mohill.
- Available to view and download from the Leitrim County Council website (<http://www.leitrimcoco.ie>).

The notice also referenced that submissions and observations on the content of the Draft Plan could be made via post or email to the Council during the public consultation period between 11th February 2022 and 27th of April 2022, with both dates inclusive. The notice also stated that late submissions/observation could not be considered.

The Council also utilised its social media platforms and website throughout the public consultation period to further publicise the availability of the Draft Plan for public viewing and to invite submissions on its content.

Following the public consultation on the Draft Plan, 209 valid written submissions have been received which include submissions from members of the public, Elected members and prescribed bodies. Appendix 1 of this report provides a list of the submissions received on the Draft Plan public consultation.

SECTION 3

**OFFICE OF THE PLANNING
REGULATOR SUBMISSION**



3 OFFICE OF THE PLANNING REGULATOR SUBMISSION

Submission Ref. No. DLCDP-197

3.1 Introduction

This section provides a summary of the issues raised by the Office of the Planning Regulator (OPR) and the respective responses and recommendations of the Chief Executive to the issues raised in the submission in relation to the Draft Plan. The responses and recommendations provided in respect of this submission should be read in conjunction with those provided in respect of the submission from the Northern and Western Regional Assembly under submission Ref. No. **DLCDP-57**.

3.2 Summary of Submission and Response of Chief Executive

The submission acknowledges the considerable work the Planning Authority has undertaken in the preparation of the Draft Plan against the backdrop of an evolving national and regional planning policy and regulatory context. The submission also commends the Planning Authority on the overall presentation and layout of the Draft Plan and its supporting documents which provide for a comprehensive strategy for the proper planning and sustainable development of the county, with clear and concise objectives and policies within a well-structured Draft Plan.

The submission emphasises the key function of the OPR in the assessment of statutory plans to ensure consistency with legislative and policy requirements relating to planning under the provisions of subsections 31AO (1) and 31AO (2) of the Act. The submission clarifies that recommendations issued by the OPR under its submission relate to clear breaches of the relevant legislative provisions of the national or regional policy framework and/or of the policy of Government, as set out in Ministerial guidelines issued under Section 28 of the Act. As such, the Planning Authority is required to implement or address recommendations made by the Office in order to ensure consistency with the relevant policy and legislative provisions.

The submission also clarifies that observations issued in the submission take the form of requests for further information, justification on a particular matter, or clarification regarding particular provisions of the Draft Plan on issues that are required to ensure alignment with policy and legislative provisions. As such, the Planning Authority is requested by the OPR to action an observation.

The submission from the OPR sets out recommendations and observations in respect of the following ten key themes:

1. Core Strategy and Settlement Strategy
2. Sustainable Development and Regeneration
3. Rural Housing and Regeneration
4. Economic Development and Employment
5. Sustainable Transport and Accessibility
6. Flood Risk Management
7. Renewable Energy Strategy
8. Environment, Heritage and Amenities
9. Implementation and Monitoring
10. General and Procedural Matters



The following provides a summary of the issues raised in respect of each of the above key themes, along with the respective responses and recommendations of the Chief Executive.

3.2.1 Core Strategy and Settlement Strategy

Observation 1 – Settlement Hierarchy Clarification

Having regard to the designation of Sligo and Letterkenny as ‘Regional Growth Centres’ in the NPF and RSES, the Planning Authority is requested to rename the Tier 2A Sub Regional Growth Centres, to reflect their status and role as sub-county settlements and to avoid any confusion with the designated Regional Growth Centres which are identified for very significant levels of population growth.

Chief Executive's Response

Table 2.2 of Section 2.4 of the Draft Plan outlines the proposed settlement hierarchy for Co. Leitrim over the Plan period, wherein the various settlements of the county are assigned to settlement levels or tiers of the hierarchy and accompanied by a description of the role of each level/tier. In respect of the role of *Tier 2A Sub Regional Growth Centres*, the Draft Plan describes these as:

“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 supporting the social, economic and cultural life within rural communities. These centres have capacity for continued growth commensurate to their role”.

It is acknowledged that the use of the settlement tier title ‘Tier 2A Sub Regional Growth Centres’, in the settlement hierarchy contained within the Draft Plan, may give rise for misinterpretation in this context, particularly given the prescribed use of the settlement tier title, ‘Regional Growth Centre’, in respect of Sligo and Letterkenny in the NPF and the RSES.

Accordingly, the Planning Authority has no objection to renaming this settlement level to a title that clearly reflects its descriptive role.

Chief Executive's Recommendation

Recommendation No. 1

Replace all references to ‘Tier 2A Sub Regional Growth Centre’ contained within the Draft Plan including maps with ‘Tier 2A Self-Sustaining Growth Town’.

3.2.2 Sustainable Development and Regeneration

Recommendation 1 – Planning Framework for Carrick-on-Shannon

- (i) Having regard to section 10(2) of the Planning and Development Act 2000, as amended, the Planning Authority is required to review its approach and provide greater clarity and transparency in the delivery of the core strategy objectives for the Key Town of Carrick-on-Shannon and to clearly set out how the objectives in section 10(2) are to be achieved in the interim and pending the adoption of a Local Area Plan for the Carrick-on-Shannon/Cortober area.



At a minimum, the Planning Authority is required to prepare maps and develop stronger and more specific policy objectives, identifying strategic objectives for the town, consistent with section 3.8 of the RSES.

In this regard, the Planning Authority is advised to consider including a high-level framework settlement plan which includes a settlement boundary, compact growth area, the core retail area, settlement consolidation / key regeneration sites, strategic employment sites, provisions for sustainable mobility and relevant key future priorities and constraints such as flooding.

- (ii) Having regard to section 3.8 of the RSES and RPOs 3.1 and 6.27 and the need to ensure that the quantum of lands zoned is aligned with the core strategy's housing allocation for Carrick-on-Shannon, the Planning Authority is required to revise core strategy objective CS OBJ 9 to commit to the completion of a Joint Local Area Plan for Carrick-on-Shannon/Cortober, in conjunction with Roscommon County Council, and informed by a Local Transport Plan prepared in consultation with the National Transport Authority, within one year of the adoption of the Plan.

The Planning Authority is also advised to include details of the preferred route corridor for the N4 Carrick-on-Shannon to Dromod national road scheme in the development plan (framework plan for Carrick-on-Shannon) if available at material alterations stage.

Chief Executive's Response

As referenced in this submission item, the Draft Plan contains a Core Strategy Objective (CS OBJ 9) which commits to the preparation of a Joint Local Area Plan (LAP) for Carrick-on-Shannon in conjunction with Roscommon County Council. The objective further states that the forthcoming LAP

"shall determine the land use zoning objectives for Carrick-on-Shannon and ensure that the quantum of land identified for residential development adheres to that indicated in Table 2.6 of this Core Strategy. The LAP shall ensure sustainable, compact, sequential growth in the combined urban centre by consolidating the existing footprint with a focus on the redevelopment and regeneration of identified infill and brownfield sites".

The Draft Plan outlines the projected housing allocation for Carrick-on-Shannon in its Core Strategy, as well as giving policy expression to the future role and development of the town under a number of themes such as compact growth, decarbonisation, retail development, economic development, tourism, sustainable transportation, infrastructure and energy.

It is considered that the approach outlined is consistent with the requirements as outlined in Section 18 of the Planning and Development Act 2000, as amended, for the preparation of the Carrick-on-Shannon LAP. Leitrim County Council is wholly committed to preparing the LAP to ensure the regeneration, consolidation and further economic development of Carrick-on-Shannon. However, it is respectfully considered premature as part of the County Development Plan process to identify settlement boundaries, compact growth areas, or strategic employment sites among other considerations, outside the statutory LAP process and the associated public consultations.

Notwithstanding the absence of a definitive date for the formal commencement of the preparation of the Joint LAP, a range of preparatory work concerning the LAP is on-going and is reasonably considered to constitute informal pre-draft preparation most notably the engagement with specialist consultants with a view to the preparation of a Local Transport Plan for the Carrick-on-Shannon / Cortober area and the impending request for tender through E-Tenders for a Town Centre First Masterplan. The

impact of flood risk on the lands previously identified with land use zoning in the Carrick-on-Shannon Local Area Plan 2010-2019 is almost complete. Defining settlement boundaries, strategic development lands, etc. in advance of the outcome of such engagements and other preparatory work would undermine the LAP making process by inserting pre-determined outcomes which would disregard necessary co-operation with partner authorities such as Roscommon County Council and the National Transport Authority on this initiative.

Leitrim County Council remains committed to an established platform of collaboration with Roscommon County Council and other key stakeholders with a view to commencing the formal preparation of the Joint Local Area Plan, in accordance with the provisions of Section 18 of the Act. In respect of the prospective timeline for the preparation of the forthcoming Carrick-on-Shannon LAP, the following provides an indicative timeline in this regard:

KEY STEP	INDICATIVE TIMELINE
Pre-Draft Work – Appointment of consultants to prepare Town Centre First Masterplan and Local Transport Plan	On-Going
Non-Statutory Public Consultation - Publish Issues Paper	Q4 2022
Commencement of Formal Draft LAP Preparation Process	Q2 2023
Members Resolution to Make or Amend Draft Plan	Q3 2023
Members Final Resolution to Make LAP (in the event of proceeding to Material Alteration Stage)	Q4 2023 – Q1 2024

This indicative timeline to be finalised and agreed with Roscommon County Council anticipates the formal adoption of the LAP between Q4 2023 – Q1 2024. Given that the Draft County Development Plan is envisaged to be formally adopted in February 2023 and taking effect towards the end of March 2023, the envisaged timeline for the making of the Joint LAP is in agreement with the timeline identified by the OPR in item (ii) of its recommendation. Moreover, the Planning Authority has no objection to the amendment of Core Strategy Objective CS OBJ 9 to reflect a commitment to complete the Joint LAP within one year of the adoption of the Draft County Development Plan noting that this will require the co-operation and support of Roscommon County Council.

In relation to the proposed N4 Carrick-on-Shannon to Dromod national road scheme, details on the Preferred Transport Solution were announced in May 2022. Regarding the road component of the preferred solution, this includes a new urban street in Carrick-on-Shannon, linking the Castlecara Road just south of St. Mary’s GAA club to the Leitrim Road (R280) north of Lis Cara housing development, in addition to a Preferred Option Corridor in which the existing road infrastructure can be upgraded or new infrastructure can be built.

The Preferred Option Corridor deviates from the existing N4 to the west of Cortober, Co. Roscommon where it progresses off-line south of the existing N4, north of the Dublin-Sligo railway line. The corridor progresses east, crossing the Elphin Road (R368) and subsequently crossing the River Shannon in the townland of Cordrehid on the Cortober side of the River Shannon over to the townland of Attirory on the Carrick-on-Shannon side of the River Shannon. The corridor joins the existing N4 again in the

townland of Lisseeghan. The corridor then progresses eastwards along the line of the existing N4 and ceases in the townland of Faulties.

The N4 Carrick-on-Shannon to Dromod national road scheme is presently at Phase 2 Option Selection. The output of this Phase is a Preferred Transport Solution (PTS) which sets out the starting point for the design in Phase 3. Having consulted with the Roscommon National Regional Road Office and ARUPs, it is not considered appropriate to include the Preferred Option Corridor in the Draft Plan. It would also require the Planning Authority to undertake the required environmental assessments for this corridor which may alter slightly as part of the Draft Plan which is considered inappropriate.

Chief Executive's Recommendation

Recommendation No. 2

Amend Core Strategy Objective CS OBJ 9 as follows:

CS OBJ 9 To prepare a Joint Local Area Plan (LAP) for Carrick-on-Shannon/Cortober in conjunction with Roscommon County Council and informed by a Local Transport Plan prepared in consultation with the National Transport Authority, within one year of the adoption of the Leitrim County Development Plan 2023-2029. The Local Area Plan shall determine the land use zoning objectives for Carrick-on-Shannon and ensure that the quantum of land identified for residential development adheres to that indicated in Table 2.6 of this Core Strategy. The LAP shall ensure sustainable, compact, sequential growth in the combined urban centre by consolidating the existing footprint with a focus on the redevelopment and regeneration of identified infill and brownfield sites.

Recommendation No. 3

Insert the following text in Section 8.11.2.1 *N4 Carrick-on-Shannon to Dromod Project*:

Details on the Preferred Transport Solution were announced in May 2022 comprising of the following components: (1) Active Travel Component (2) Public Transport Component (3) Demand Management Measures and (4) a Road Component.

The non-road components advocate improvements to the walking and cycling infrastructure within Carrick-on-Shannon and Cortober, in addition to enhancements to local bus services and specific interventions to control demand and reduce trips, all of which would support an increase in sustainable trip making. This, in turn, could lead to a reduction in traffic levels and congestion in the town.

The road component of the Preferred Transport Solution includes the development of a new urban street in Carrick-on-Shannon, linking the Castlecara Road just south of St. Mary's GAA club to the Leitrim Road (R280) north of Lis Cara housing development, in addition to a Preferred Option Corridor in which the existing road infrastructure can be upgraded or new infrastructure can be built. The corridor deviates from the existing N4 to the west of Cortober, Co. Roscommon where it progresses off-line south of the existing N4, north of the Dublin-Sligo railway line. The corridor progresses east, crossing the R368 and subsequently crossing the River Shannon in the townland of Cordrehid on the Cortober side of the River Shannon over to the townland of Attirory on the Carrick-on-Shannon side of the River Shannon. The corridor joins the existing N4 again in the townland of Lisseeghan. The corridor then progresses eastwards along the line of the existing N4 and ceases in the townland of Faulties, as announced in May 2022.



Recommendation 2 – Low Density Residential in Ballinamore

Having regard to national and regional policy objectives NPO 3c and RPO 3.2, section 4.19 of the *Development Plans, Guidelines for Planning Authorities (2007)*, and section 10(2)(n) of the Planning and Development Act 2000, as amended, it is considered that the areas zoned for low density residential development in Ballinamore on the west side of the Enniskillen Road (R202) would give rise to inappropriate ribbon development, which would work against the development of back-lands and against compact growth in the future as the town develops towards the Ballinamore Secondary School. The planning authority is required to review and reduce the extent of low density residential zoning at this location.

Chief Executive's Response

In proposing the subject lands for *Low Density Residential* zoning, the Planning Authority had regard to the existing character within this area of the settlement where much of the residential development patterns are characterised as being of low density and typically comprising of individual or pairs of semi-detached housing on generous plot ratios. The proposed *Low Density Residential* zoning for the subject lands was also in response to the need to strike an appropriate balance between more centrally located *Existing Residential and New Residential* zoned lands which could accommodate higher density residential developments which support national and regional policy requirement in terms of facilitating compact growth and the development of brownfield or backland sites.

Moreover, the Strategic Flood Risk Assessment (SFRA) conducted with respect to the Draft Plan has identified potential flooding constraints associated with the area to the north and west of the subject lands based on two climate change scenarios of the likely Mid-Range Future Scenario (MRFS) and the more extreme High-End Future Scenario (HEFS). On the basis of these constraints, and the linear nature of the subject lands imposed as a result of these constraints, it is considered that the subject lands would be inappropriate for higher density residential development. An extract of the future scenario SFRA mapping for Ballinamore is depicted in Figure 1 below, with the subject lands outlined in red.

Furthermore, it is considered that the subject lands provide for suitable locations for potential serviced sites for individual dwellings which can act as a viable alternative to one-off housing in the open countryside. The Planning Authority also recognises that the subject lands have considerable strategic importance as a means of access to undeveloped backlands to the north of the town centre. These lands will have increasing strategic importance in future development plan cycles and the future development of Ballinamore owing to their close proximity to the town centre and access to existing services and infrastructure. In order to safeguard access to these lands, it is recommended that an objective be inserted into the Ballinamore Settlement Plan (Volume II of the Draft Plan) in relation to the subject lands with a view to facilitating the development of an access road to facilitate the potential release and development of the backlands to the north of the town centre.

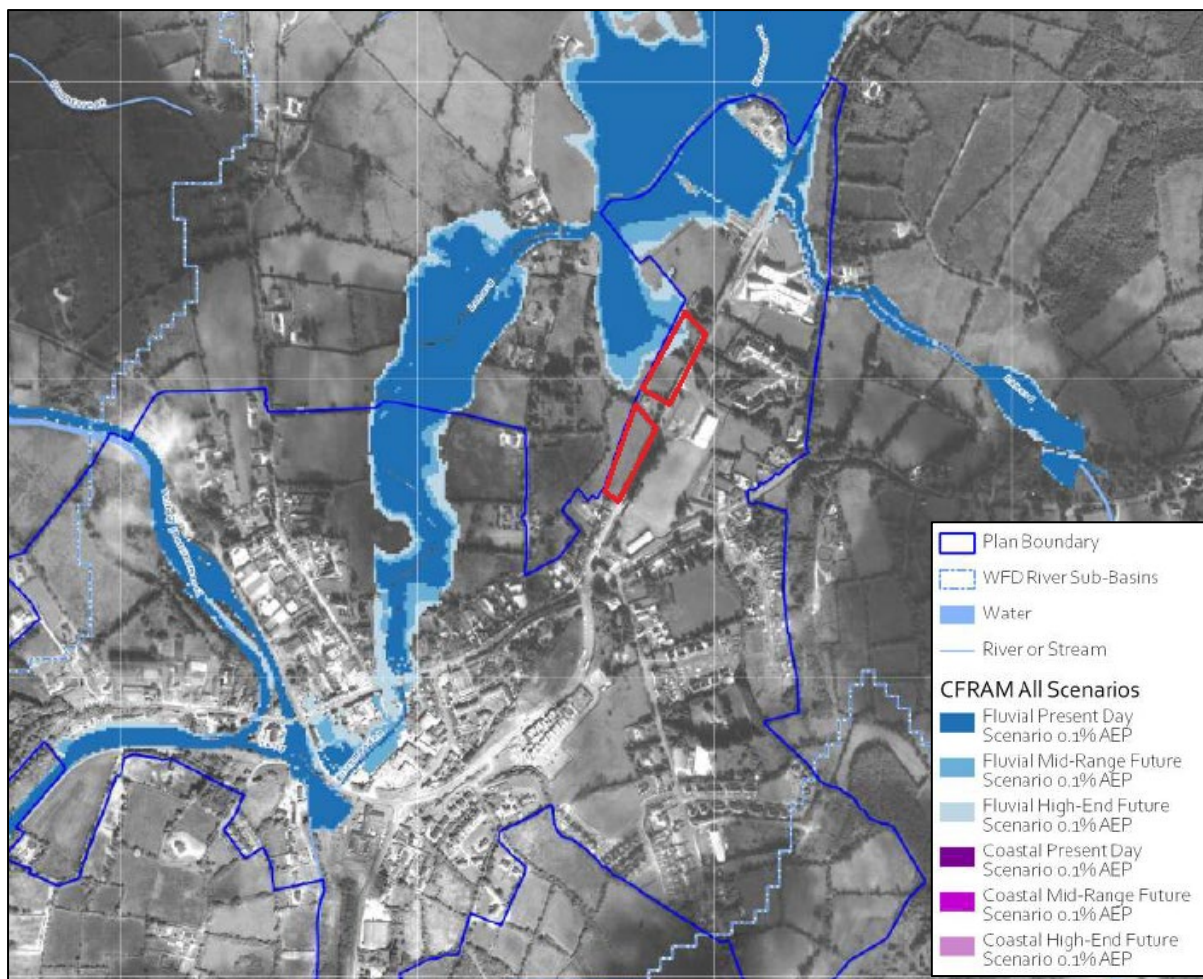


Figure 1.1: Extract of Strategic Flood Risk Assessment Settlement Mapping for Ballinamore (Source: Strategic Flood Risk Assessment – Draft Leitrim County Development Plan 2023-2029, CAAS Ltd.)

Chief Executive’s Recommendation

Recommendation No. 4

Insert the following objective into the Ballinamore Settlement Plan and identify same on the accompanying Ballinamore Objectives Map, with subsequent objectives to be renumbered appropriately:

BNE 32 *Seek the provision of an access junction within the lands zoned **Low Density Residential** on the western side of the R202 (Park Road) with a view to facilitating an access road from the R202 to undeveloped lands west of these **Low Density Residential** zoned lands and to backlands north of the town centre. Such an objective shall reserve a minimum width of 15 metres to provide adequate pedestrian and cyclist facilities along with road access.*

Recommendation 3 – Compact Growth Target

Having regard to NPO 3c of the NPF and RPO 3.2 of the RSES for the Northern and Western Regional Assembly, the Planning Authority is required to amend section 2.2 and CS OBJ 6 of the draft Plan such that it is proposed to deliver at least 30% of all new homes that are targeted in all settlements in the county within their existing built-up footprints.



Chief Executive's Response

Part (c) of RPO 3.2 of the RSES states the following:

*“Deliver at least 30% of all new homes that are **targeted in settlements with a population of at least 1,500** (other than the Galway MASP and the Regional Growth Centres), within the existing built-up footprints”* (emphasis added).

Moreover, RPO 3.3 of the RSES states the following:

“Deliver at least 20% of all new housing in rural areas on brownfield sites”.

From examination of these two policy objectives, it is clear that there is a distinction made between urban and rural settlements with the inference that ‘urban’ is defined in the RSES as being a settlement with a population of 1,500 or more. This is therefore in line with the same definition for urban centre from the Central Statistics Office (CSO), from which the RSES also relies on for the definition of a built-up footprint for the purposes of part (c) of RPO 3.2.

Section 2.2 of the Draft Plan provides a series of strategic aims to guide the future development of the county over the plan period. One such strategic aim (no. 5) seeks to *“deliver at least 30% of all new homes that are targeted in Carrick-on-Shannon, Ballinamore 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”*. With the population of Carrick-on-Shannon in excess of 1,500, as recorded in the 2016 Census, this settlement clearly qualifies as an ‘urban’ settlement. Furthermore, the Draft Plan extends this ‘urban’ classification to Ballinamore and Manorhamilton, with the latter settlement recording a population of 1,466 in the 2016 Census and anticipated to have a population in excess of 1,500 following collation of the 2022 Census recordings.

This distinction between ‘urban’ and ‘rural’ settlements is substantiated by the NWRA in its submission on the Draft Plan wherein Observation 3 of its submission requests that the Draft 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 (i.e. in towns/villages under 1,500 population and rural areas/countryside”*.

Accordingly, it is considered that the Draft Plan has due regard to NPO 3c of the NPF and RPO 3.3 of the RSES and given appropriate local policy expression to these national and regional policy objectives in the form of Strategic Aim no. 5 of Section 2.2 of the Draft Plan and Core Strategy Objective CS OBJ 6 of the Draft Plan.

Chief Executive's Recommendation

No change to the Draft Plan.

Recommendation 4 – Standards and Guidelines

In accordance with section 12(18) of the *Planning and Development Act 2000*, as amended, and having regard to section 1.4 and SPPR 1 of the *Urban Development and Building Heights Guidelines for Planning Authorities (2018)*, the Planning Authority is required to amend section 13.9.1 of the draft Plan. The Office advises the Planning Authority to consider including the following amended text as it considers that the text is not consistent with the Guidelines:

‘Elsewhere, other than Carrick-on-Shannon, the extent of any increased building height shall be generally 3-4 storeys high. Any increase in building height above this will be



carefully considered due to the potential to give rise to considerable adverse impacts on the character, scale and form of such settlements as well as adverse impacts on residential amenity.'

Chief Executive's Response

To recap, the relevant paragraph in Section 13.9.1 states the following:

"In all settlements, other than Carrick-on-Shannon, the extent of any increased building height shall be limited to 3-4 storeys high. Any increase in building height above this limitation is considered unacceptable with the potential to give rise to considerable adverse impacts on the character, scale and form of such settlements as well as adverse impacts on residential amenity".

The Planning Authority has no objection to the inclusion of the suggested amended text in place of the above paragraph.

Chief Executive's Recommendation

Recommendation No. 5

Amend text in Section 13.9.1 as follows:

*~~"In all settlements~~ **Elsewhere**, other than Carrick-on-Shannon, the extent of any increased building height shall be limited to 3-4 storeys high. Any increase in building height above this ~~limitation is considered unacceptable with~~ **will be carefully considered due to** the potential to give rise to considerable adverse impacts on the character, scale and form of such settlements as well as adverse impacts on residential amenity".*

3.2.3 Rural Housing and Regeneration

Recommendation 5 – Rural Housing

Having regard to NPO 19 and NPO 15, *The Sustainable Rural Housing Guidelines for Planning Authorities (2005)* and the designation of areas under strong urban influence in the *Donegal County Development Plan 2018-2024*, the Planning Authority is required to:

- (i) review the designation of Low Capacity Areas and consider including a further Low Capacity Area in the north of the county. The area along the N15 and the coastline appears to be under strong urban pressure and the Office notes that the Donegal County Development Plan 2018-2024 identifies the hinterland of Bundoran as being under strong urban influence (Map 6.2.1);
- (ii) amend policy RUR SET POL 3 to delete the word 'links' and replace it with 'economic or social needs' consistent with NPO 19;
- (iii) expand the draft Plan's rural housing policies for both Low Capacity Areas and other rural areas to include reference to 'the viability of smaller towns and villages'; and
- (iv) amend RUR SET POL 3 which identifies persons with a demonstrable social need to live in a particular local rural area as persons who have lived a substantial period of their lives in the



local rural area (minimum 18 months) in which the house is proposed. The time period should be increased on an evidence basis to a meaningful level.

Chief Executive's Response

In response to item (i) of this submission recommendation, the identification of Low Capacity Areas (see Map No. 3 of Volume III – Book of Maps of the Draft Plan) was achieved following the guidance set out in NPO 19 of the NPF. NPO 19 outlines that a distinction is to be made “*between areas under urban influence, i.e. within the commuter catchment of cities and large towns and centres of employment, and elsewhere.*” Footnote 34 of the NPF further explains how a commuter catchment is to be identified and states “*The standardised EU/OECD definition of a city region is where 15% of the workforce is employed in the principal city area. When this is mapped, it defines a city region commuting catchment, or functional area.*”

It is considered that the extent of the Low Capacity Areas in the Draft Plan remains consistent with the distinction required under NPO 19 and the methodology employed in defining the area was entirely evidenced based, and included utilisation of CSO Census 2016 Place of Work, School or College – Census of Anonymised Record (POWSCAR) dataset relating to population and commuter activities of the Five Cities, Regional Growth Centres and Key Towns both within and outside the county in order to determine commuter catchments. The results are reflected in Map No. 3 of Volume III of the Draft Plan. The Planning Authority cannot provide an evidential basis having considered planning application data over the past 5 years to support a deviation from such a policy. It is considered that there are other considerations in the Draft Plan in relation to landscape designations which will also have to be considered in the context of assessing individual dwellings against the policy framework contained in the Draft Plan. Finally, the Planning Authority would respectfully indicate that the Donegal County Development Plan 2018-2024 predated the publication of both the National Planning Framework and the Regional Spatial and Economic Strategy. The methodology employed therein is not therefore consistent with the methodology now required for identifying areas under urban influence.

Regarding item (ii) of the above recommendation, the Planning Authority has no objection to the suggested reference to ‘*economic or social needs*’ in respect of policy RUR SET POL 3.

In response to item (iii) of the above recommendation, policies RUR SET POL 2 and RUR SET POL 3 are recommended to be amended to include reference to “*the viability of smaller towns and rural settlements*”.

In relation to item (iv) of the above recommendation, the substantial period of 18 months referred to in the applicant criteria established in policy RUR SET POL 3 arose through an amendment to the Chief Executive's Draft Plan carried at the Special Meeting of Leitrim County Council on the 24th January 2022. The amendment saw a reduction from the previously proposed substantial period equating to 5 years reduced to 18 months for prospective applicants in respect of policy RUR SET POL 3.

In supporting this proposed amendment, the Planning Authority had regard to the *Sustainable Rural Housing Development Guidelines* (2005) which remain in operation. The guidelines refer to persons who are an intrinsic part of the rural community who have “*spent substantial periods of their lives living in rural areas as members of their established rural community*”.

It is noticeable that the guidelines do not define, in terms of time, what a ‘*substantial*’ period is in this regard. Similarly, the OPR does not define what it terms “*a meaningful level*” in its submission on the Draft Plan. Moreover, it is recognised that the current Development Plan does not contain any similarly worded policies for prospective applicants to demonstrate similar requirements by way of a



minimum period of time spent in a rural local area although the period of 5 years is reflected within some other County Development Plans including those of neighbouring Local Authorities.

Given the need to sustain and support our rural communities and in reflection of the policy support contained within the NPF (NPO 15 refers), the Planning Authority is conscious of the need to guard against unintended consequences from policies that are unduly restrictive to the sustainable growth of our rural communities.

Notwithstanding, it is recognised that there is a need to strike an appropriate balance to provide for sufficient policy safeguards for genuine applicants to live in their relevant rural local areas within the designated 'Low Capacity Areas' whilst guarding against urban generated rural housing from applicants with significantly less or minimal social and economic ties to a rural area. Moreover, it is recognised that employing a significantly lower threshold of applicant criteria, in comparison to other neighbouring counties, may have unintended consequences for prospective applicants with more established ties to a rural local area by introducing development pressures in rural areas which may undermine the viability of future rural housing applications, i.e. excessive ribbon development, excessive concentrations of individual domestic wastewater treatment systems (DWWTSs), proliferation of access points onto the local road network which could undermine traffic safety, etc.

Accordingly, in recognition of these unintended consequences and the need to sustain and support our rural communities in a manner that is not unduly restrictive, it is recommended that the substantial period referred to in policy RUR SET POL 3 be increased to 3 years.

Chief Executive's Recommendation

Recommendation No. 6

Amend policy RUR SET POL 2 as follows:

RUR SET POL 2 To manage the growth of areas that are under strong urban influence and identified as Low Capacity Areas (see Map No. 3 in Volume III – Book of Maps) to avoid their over development whilst accommodating demand from individuals for permanent residential development in Other Rural Areas, subject to normal planning considerations **and having regard to the viability of smaller towns and rural settlements.**

Recommendation No. 7

Amend policy RUR SET POL 3 as follows:

RUR SET POL 3 To accommodate demand from existing members of the rural community for permanent residential development in Low Capacity Areas who have strong **links economic and social needs** to the area and who are an intrinsic part of the rural community in which planning permission is being sought, subject to normal planning considerations and who satisfy the following criteria:

1. Persons with a demonstrable social need to live in a particular local rural area - Persons who have lived a substantial period of their lives in the local rural area (**minimum ~~18 months~~ 3 years**) in which the house is proposed.
2. Persons with a demonstrable economic need to live in the particular local rural area – Persons employed full-time in rural-based activity such as farming, horticulture, forestry, bloodstock or other rural-based activity in the area in which they wish to build or whose employment is intrinsically linked to the rural



area in which they wish to build, such as teachers in rural schools or other persons who by the nature of their work have a functional need to reside permanently in the rural area close to their place of work, provided that they have never owned a house in a rural area.

All applicants for one-off rural housing will need to demonstrate compliance with the qualifying criteria of one of the above two categories unless otherwise specified as being located within an area where this Rural Housing Policy does not apply.

Observation 2 – Rural Regeneration

Having regard to NPO 15 and RPO 3.3, the Planning Authority is requested to include measures to monitor the following:

- (i) residential development permitted as single rural houses; and
- (ii) the 20% target for the delivery of all new housing in rural areas on brownfield sites.

Chief Executive's Response

Objective RUR SET OBJ 5 of the Draft Plan contains provisions to monitoring the rural housing development and population trends over the lifetime of the Plan to gauge if further policy responses are required during this period. Notwithstanding, it is accepted that this policy should be amended to give more explicit reference to monitoring rural housing development in the county in the context of NPO 15 and RPO 3.3.

Chief Executive's Recommendation

Recommendation No. 8

To amend RUR SET OBJ 5 as follows:

RUR SET OBJ 5 To monitor the provision of single rural houses over the Plan period, having regard to the rural housing development target of 20% of all new housing in rural areas to be accommodated on brownfield sites, and trends in rural housing and population during the lifetime of the plan to ascertain if further rural housing policy responses are required during the plan period.

3.2.4 Economic Development and Employment

Recommendation 6 – Enterprise and Employment

Having regard to National Strategic Objective Outcome 5 of the NPF, NPO 10b, the Growth Ambition for the region set out in the RSES and section 10(2)(n) of the *Planning and Development Act 2000*, as amended, the Planning Authority is required to provide an evidence-based rationale for the overall quantity and the spatial location of the following Enterprise and Employment land zonings, having regard to their peripheral locations and all relevant infrastructural constraints (tiered approach to zoning):



- (i) Ballinamore - the area of land, of c. 8.6 hectares, located to the southeast of the town on the east side of the Willowfield Road, located outside the CSO boundary;
- (ii) Drumshanbo - the area of land to the north of the town centre, in particular the area of c.3.9 hectares on the east side of the R207, north of Mulvey's Hardware, located outside the CSO boundary;
- (iii) Kinlough - the area of land, of c. 5 hectares, located to the western periphery of the town;
- (iv) Mohill - the area of land located on Green Road at the northern periphery of the town and north of the Mohill Tyre Centre; and
- (v) Carrigallen - the area of land, of c. 2.2 hectares, on the Ballinamore Road, northwest of the town centre.

In the absence of a clear evidence-based rationale for these zoning objectives, the Planning Authority is required to omit any of the above lands, which cannot be justified.

Chief Executive's Response

The *Enterprise and Employment* land use zoning objective has been included for lands in settlements contained in Tiers 2A, 2B and 3 of the Draft Plan, in order to reflect the location of existing enterprise and ensure that opportunities are available for expansion of those existing facilities, as well as ensuring land availability for new industry and enterprise in order to promote opportunities to enhance the overall economic and employment bases in these towns, key villages and villages. The lands zoned for *Enterprise and Employment* also have the benefit of public infrastructure availability.

- (i) The lands that have been zoned for the *Enterprise and Employment* land use in Ballinamore follow this approach and include existing enterprise operations and provide for some level of expansion at these facilities. Indeed, all the sites apart from one on the Enniskillen Road serve existing facilities and the land zoning will allow for the expansion of these. The lands at Willowfield Road include an existing Enterprise Centre towards the front of a brownfield site which has potential for further expansion of the Enterprise Centre to the rear. This reduces the quantum of lands that are available as a greenfield option for new industry and enterprise in the town. Given the location of the lands it is considered reasonable to maintain the zoning for *Enterprise and Employment* on the lands adjacent to and to the rear of the Ballinamore Enterprise Centre and to zone the remaining greenfield lands as *Phase 2 Enterprise and Employment*. The lands zoned for Phase 2 would be open for development subject to the lands at the front being developed or as part of an overall development proposal for the entire lands. This is considered unlikely. This reduces the extent of lands identified for release during the life of the Development Plan from 8.96 hectares to 2.60 hectares with the remaining 6.36 identified as Phase 2 lands.
- (ii) It is acknowledged that the lands identified in Drumshanbo are at the edge of the settlement however it should be noted that the lands are serviced by public infrastructure and surrounded by lands with similar existing enterprise use. The site offers an opportunity for new industry and enterprise facilities to be provided. Given the location of the lands it is considered reasonable to maintain the zoning for *Enterprise and Employment* on the roadside lands and to zone the lands at the rear as *Phase 2 Enterprise and Employment*. The lands zoned for Phase 2 would be open for development subject to the lands at the front being developed or as part of an overall development proposal for



the entire lands. This reduces the extent of lands identified for release during the life of the Development Plan from 3.85 hectares to 2.14 hectares with the remaining 1.71 identified as Phase 2 lands.

- (iii) The lands that have been zoned for the *Enterprise and Employment* land use in Kinlough are the only lands zoned for such a land use in the settlement which is the 3rd largest settlement in the county. They offer a realistic opportunity for new industry and enterprise facilities to be provided in the Tier 2B settlement and for Kinlough to realise its potential in line with its status in the Core Strategy. It is considered reasonable to maintain this element of the zoning provision as set out in the Draft Plan. It also represents a reduction in the extent of lands zoned for this purpose as contained in the existing County Development Plan. These lands will be identified as requiring infrastructural upgrades in the form of footpath, street lighting and piped water connection extensions.
- (iv) The lands off the Ballinamore Road in Mohill include an existing Enterprise Centre which has potential for further expansion of the Enterprise Centre to the north. The quantum of lands that are zoned for *Enterprise and Employment* as compared to those zoned in the existing County Development Plan should also be noted. A large portion of the site is now zoned as *Open Space* with a *Constrained Land Use* zoning which further reduces the amount of lands that may be developed in this Tier 2B settlement. Other lands identified presently for Enterprise and Employment on the Dromod Road to the south and lands to the Carrigallen Road to the east have been removed in the Draft Plan. It is considered reasonable to maintain this element of the zoning provision as set out in the Draft Plan.
- (v) It is acknowledged that the lands identified in Carrigallen are at the edge of the settlement however it should be noted that the remainder of lands zoned for *Enterprise and Employment* serve existing facilities (Jetwash International) where future expansion is accommodated through the proposed zoning. The lands on the Ballinamore Road offer an option for small scale enterprise units and the zoning in the Draft Plan brings increased flexibility in respect of accommodating compatible development types. It is important to note that in no circumstance would this flexibility be allowed to undermine the overall strategic objective of compact growth in Carrigallen. It is envisaged that the zoning will offer opportunities for various development types and scale within appropriate land use zones, which in turn will be considered as part of the development management process. The lands are presently zoned for Enterprise and Employment use in the current County Development Plan. It is considered reasonable to maintain this element of the zoning provision as set out in the Draft Plan. These lands will be identified as requiring infrastructural upgrades in the form of footpath, street lighting and piped water connection extensions.

Chief Executive's Recommendation

Recommendation No. 9:

Zone the lands to the south of the brownfield site which includes the Ballinamore Enterprise Centre as *Phase 2 Enterprise and Employment*.

Recommendation No. 10:

Include the following after the final paragraph in Section 2.5 Economic Development, Volume II:

Phase 2 Enterprise and Employment is identified in the Plan to identify lands that will be developed over the period of the next Development Plan. However, they will also act as a reserve of new industrial land, in the event that economic growth and demand over the period of this Plan is greater

than estimated and lands zoned for *Enterprise and Employment* are fully taken up before the end of this Plan in 2029.

Phase 2 Enterprise and Employment lands will be suitable for development when:

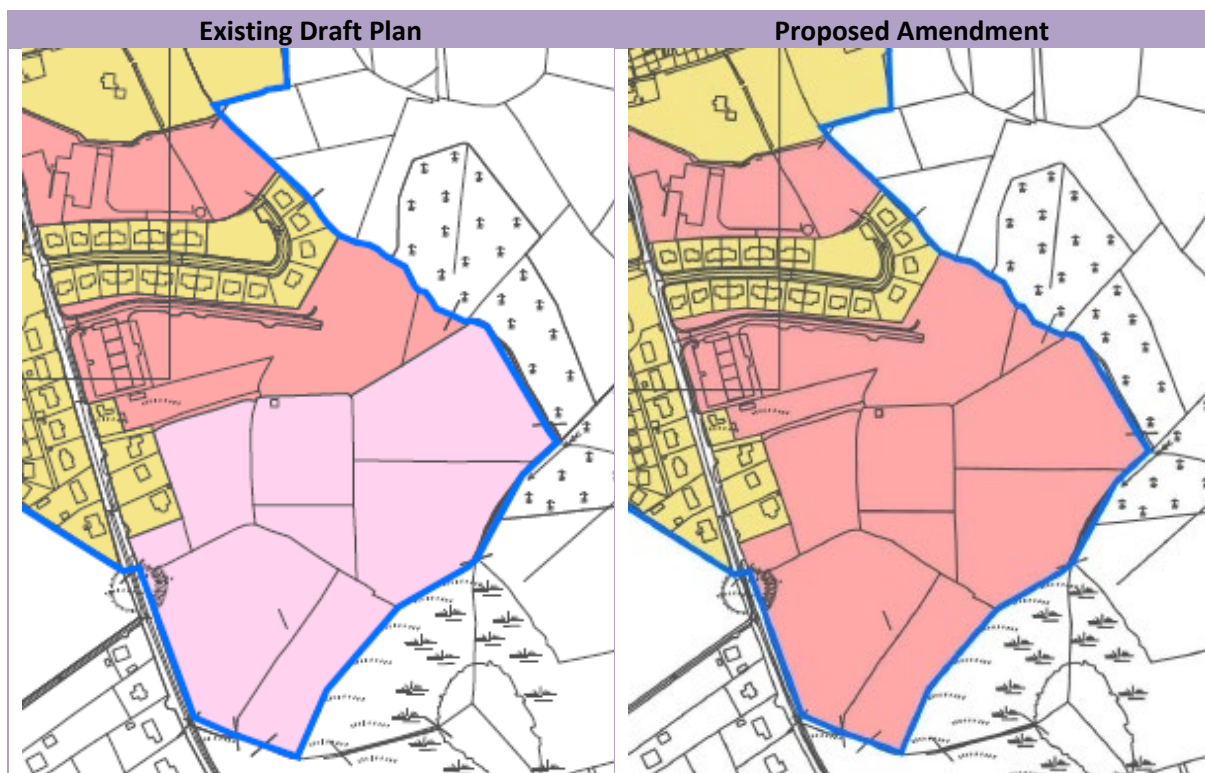
- a) All lands zoned *Enterprise and Employment* have been developed; or
- b) A development proposal for the entire lands to be developed as part of a single planning application and subject to the availability of the necessary infrastructural capacity.

Recommendation No. 11:

Amend Objective BNE 10 in Section 2.5 Economic Development, Volume II as follows:

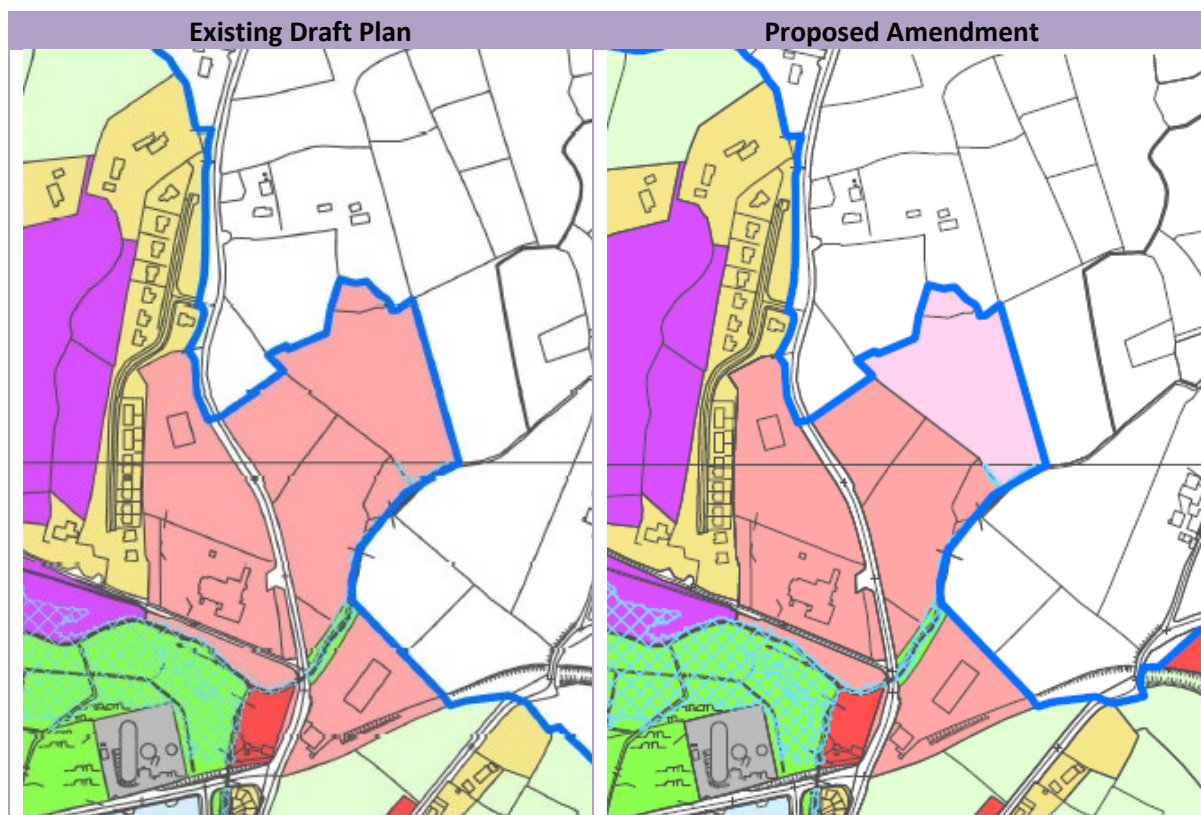
BNE 10: Liaise with Ballinamore Enterprise Centre in the development of the lands zoned 'Enterprise and Employment' off the Willowfield Road, including the provision of an **expanded** remote working hub (if deemed feasible and required), office units and start-up light industrial, industrial and commercial units. **Lands zoned Phase 2 Enterprise and Employment** lands will be suitable for development subject to:

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



Recommendation No. 12:

Zone the lands to the rear of the roadside lands on the east of the R207 to the north of Drumshanbo as *Phase 2 Enterprise and Employment*.



Recommendation No. 13:

Include the following after the final paragraph in Section 5.5 Economic Development, Volume II:

Phase 2 Enterprise and Employment is identified in the Plan to identify lands that will be developed over the period of the next Development Plan. However, they will also act as a reserve of new industrial land, in the event that economic growth and demand over the period of this Plan is greater than estimated and lands zoned for *Enterprise and Employment* are fully taken up before the end of this Plan in 2029.

Phase 2 Enterprise and Employment lands will be suitable for development when:

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

Recommendation No. 14:

Include a new Objective DSO 9 in Section 5.5 Economic Development, Volume II and renumber subsequent objectives accordingly:

DSO 9: Facilitate the development of lands zoned *Phase 2 Enterprise and Employment* lands subject to:

- a) All lands zoned *Enterprise and Employment* have been developed; or



- b) A development proposal for the entire lands to be developed as part of a single planning application.

Observation 3 – Extractive Industry

Having regard to National Policy Objective 23 and the section 28 *Quarries and Ancillary Activities Guidelines for Planning Authorities (2004)*, the Planning Authority is requested to include a map to show the location of quarries and minerals across County Leitrim.

Chief Executive's Response

The Draft Plan recognises the important role that the extractive industry has in the economy of the county and that it is an important source of employment in Co. Leitrim. A number of policies and objectives have been included in Section 10.7 of the Draft Plan which support the extractive industry while having regard to protecting residential amenity and prevention of pollution and safeguarding groundwater sources. The merit of including a map to show the location of quarries and minerals in the county is questioned, given the limited level of detail that could be conveyed and difficulties in accurately reflecting the most up to date extents of any quarry. It is considered that such data is available already from the Geological Survey of Ireland website. Minerals data and maps available include Minerals Prospectivity Mapping Project, Mineral localities, Quarry directory, Aggregate Potential Mapping and Exploration Records/Open File.

Chief Executive's Recommendation

No change to the Draft Plan.

3.2.5 Sustainable Transport and Accessibility

Recommendation 7 – Sustainable Transport and Accessibility

Having regard to NPO 27, NPO 54 and section 10(2)(n) of the Planning and Development Act, 2000, as amended, the Planning Authority is required to:

- (i) commit to a clear timeline for the commencement and progress of engagement with other transport agencies with the overall objective of delivering the transport strategy for the county within two years of the adoption of the Plan;
- (ii) include potential targeted objectives for what the Plan intends to achieve in terms of sustainable transport over the plan period, in respect of the various transport modes and the priorities for same under Government's Smarter Travel, including setting modal share targets; and
- (iii) commit to devising an effective monitoring programme for modal share targets.

Chief Executive's Response

The general supportive comments of the OPR with respect to the approach taken in the Draft Plan are welcomed. Indeed there is little by way of narrative contained in this section of the OPR submission which precedes Recommendation No. 7 which outlines any particular issue with regard to our approach to dealing with Sustainable Transport.



The first part of the recommendation relates to the delivering a transport strategy for the county which relates to MSSM OBJ 2 of the Draft Plan.

MSSM OBJ 2 To promote, facilitate and co-operate with other transport agencies in devising and securing the implementation of the transport strategy for the county to achieve an agreed modal share target for private car for total commuter journeys within the county and a target of total commuter journeys to be undertaken by sustainable mobility modes such as walking, cycling and public transport within the life of this Draft Plan. (See also **ST OBJ 1** in Chapter 12 - Climate Change and Renewable Energy in this regard)

The Planning Authority has no difficulty with the first requirement in relation to committing to a clear timeline for the commencement and process of engagement with other transport agencies with the overall objective of delivering the transport strategy for the county although delivering same within two years of the adoption of the Plan is not considered realistic. The availability of up-to-date data, principally derived from the Place of Work, School or College Anonymised (POWSCAR) dataset from the 2022 Census of Population, will be a critical data source in establishing modal share targets. It is considered that this data will not be available until the second half of next year on the basis of when the corresponding data was released after the 2016 Census. The Council therefore commits to the delivery of the transport strategy for the county within two years of the publication of the POWSCAR data from the 2022 Census.

It is the inclusion of potential targeted objectives for what the Plan intends to achieve in terms of sustainable transport over the plan period, in respect of the various transport modes and the priorities for same under Government's Smarter Travel, including setting modal share targets that presents a difficulty for the Local Authority at this time. It is considered that such targeted objectives including setting modal share targets will derive from the transport strategy and that it is premature at this time to accede to this request.

It is considered useful for the Elected Members to consider the contents of Section 10 (2)(n) of the Planning and Development Act 2000, as amended, and the 2 National Policy Objectives from the National Planning Framework referred to in the OPR submission.

Section 10 (2)(n) requires that a Development Plan shall include objectives for

the promotion of sustainable settlement and transportation strategies in urban and rural areas including the promotion of measures to—

- i) reduce energy demand in response to the likelihood of increases in energy and other costs due to long-term decline in non-renewable resources,
- ii) reduce anthropogenic greenhouse gas emissions and address the necessity of adaptation to climate change, taking account of the local authority climate action plan (within the meaning of section 14B of the Climate Action and Low Carbon Development Act 2015), where such a plan has been made for the area in question;
- iii) in particular, having regard to location, layout and design of new development.

National Policy Objective 27

Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments and integrating physical activity facilities for all ages.



National Policy Objective 54

Reduce our carbon footprint by integrating climate action into the planning system in support of national targets for climate policy mitigation and adaptation objectives, as well as targets for greenhouse gas emissions reductions.

It is the considered opinion of the Planning Authority that the Draft Plan delivers on adhering to the requirements of Section 10 (2)(n) of the Act but also to the requirements of both stated National Policy Objectives. The wording of this section of the Act is clear that a Development Plan shall include objectives for the promotion of settlement and transportation strategies in urban and rural areas including the promotion of measures to reduce energy demand, reduce greenhouse gas emissions, adapt to climate change and the location, layout and design of new development. The only targets mentioned in NPO 54 relate to greenhouse gas emissions reductions. There is no stated requirement to include modal share targets.

It is acknowledged in the OPR submission that the Planning Authority has engaged with the National Transport Authority (NTA) in the preparation of the Draft Plan, principally in the identification and interrogation of modal share data at a county-wide level and in respect of the Carrick-on-Shannon/Cortober CSO defined settlement. It is clear that this engagement is critical to developing the transport strategy for the county envisaged in the policy framework provided in Chapter 8 of the Draft Plan. The Planning Authority had regard to previous engagements with the NTA in the preparation of the Draft Plan, who have advised on the difficulty of setting realistic and measurable modal share targets at a county wide level and consider the appropriate approach should be to set realistic targets for the Key Town settlement of Carrick-on-Shannon arising from the forthcoming Local Transport Plan for the combined urban settlement. These issues can be agreed as part of the preparation of the Transport Strategy.

Whilst the benefit of including targets for modal change is acknowledged, the Planning Authority is unaware of a current national target available to which the Draft Plan can presently align with. In the absence of such information and guidance, the Council is not in a position to provide a well-informed and realistic target for inclusion in the Plan at this time. In addition, it is considered that the setting of any targets should be agreed between all the stakeholders i.e. the Council and the transport agencies as it will require a multi-agency approach in the funding and delivery of sustainable transport projects if any targets identified are to be achieved.

Agreed modal share targets developed in the preparation of the Local Transport Plan for Carrick-on-Shannon may prove useful in determining modal share targets in other settlements of the county, but the reality is that the level of public transport provisions and active travel infrastructure (i.e. a significantly larger network of cycle paths and footpaths) available in Carrick-on-Shannon is not comparable with any other settlement in the county.

Regarding item (iii) of the above recommendation, the Council is committed to devising an effective monitoring programme for modal share targets identified in the preparation of the Carrick-on-Shannon Local Transport Plan, with policy support for such monitoring to be provided in the forthcoming Carrick-on-Shannon / Cortober Local Area Plan. At present, outside of the publication of the POWSCAR data, the Local Authority has no current monitoring of modal share and will engage with the NTA for advise on this issue in advance of the preparation of the Local Transport Plan for Carrick-on-Shannon / Cortober in conjunction with Roscommon County Council. This in time will inform the Transport Strategy for the county. Amendments to both MSSM OBJ 1 and 2 are recommended on foot of the above considerations.



Chief Executive's Recommendation

Recommendation No. 15:

To amend MSSM OBJ 1 as follows

To prepare a Local Transport Plan in collaboration with the National Transport Authority (NTA), Transport Infrastructure Ireland (TII), Roscommon County Council and other relevant stakeholders for the Key Town of Carrick-on-Shannon and establish specific modal share targets for the town to be incorporated into the forthcoming Carrick-on-Shannon Local Area Plan. **This will include devising and implementing an effective monitoring programme for the achievement of the modal share targets contained therein.**

Recommendation No. 16:

To amend **MSSM OBJ 2** as follows:

~~To promote, facilitate and co-operate with other transport agencies in devising and securing the implementation of the~~ **prepare a transport strategy for the county in co-operation with other transport agencies to include the National Transport Authority, Transport Infrastructure Ireland and the Department of Transport within 2 years of the publication of the POWSCAR data from the 2022 Census. The transport strategy will outline measures, if implemented, to achieve an agreed modal share target for private car for total commuter journeys within the county and a target of total commuter journeys to be undertaken by sustainable mobility modes such as walking, cycling and public transport within the life of this Draft Plan. This will include devising and implementing an effective monitoring programme for the achievement of the modal share targets contained therein.** (See also **ST OBJ 1** in Chapter 12 - Climate Change and Renewable Energy in this regard)

Recommendation 8 – National Roads

Having regard to National Strategic Outcome 2 of the NPF, RPO 6.7 and the *Spatial Planning and National Roads Guidelines for Planning Authorities (2012)*, the Planning Authority is required to:

- (i) review section 8.11.2.5 of the draft Plan and associated objective CARRICK OBJ 6 and policy TRANS POL 5, arising from the potential adverse impact of the proposed '*exceptional circumstance*' access onto the N4 at Carrick-on-Shannon in advance of undertaking an evidence-based analysis in accordance with the process set out in section 2.6 of the Guidelines;
- (ii) review objective MHN 23 to relocate the Manorhamilton fire station to a site which adjoins the N16 national primary road in light of the required process for access onto national roads set out in section 2.6 of the Guidelines;
- (iii) omit the reference to '*inappropriate*' new access points to national roads in TRAN POL 2 which is not consistent with section 2.5 of the Guidelines; and
- (iv) omit the reference to '*save for exceptional circumstances where alternative access cannot be achieved*' in objective RUR SET POL 9 which is not consistent with section 2.5 of the Guidelines.



Where the process for new access onto national roads specified under (i) and (ii) is not achieved, the Planning Authority is required to omit the relevant provisions from the draft Plan.

Chief Executive's Response

In response to item (i), Section 8.11.2.5 of the Draft Plan reiterates the policy context contained within the *Spatial Planning and National Roads Guidelines for Planning Authorities* (2012) for availing of a less restrictive approach on national policy on access to national roads in respect of developments of national and regional strategic importance. In this case, the aforementioned section refers to the intention of the Planning Authority to develop and agree a policy with TII on facilitating an access from the N4 national primary road to lands east of Carrick-on-Shannon identified for regionally significant employment use. The development of this regional significant opportunity site has been identified as a Key Future Priority for Carrick-on-Shannon in the RSES. The Planning Authority accepts on reflection that the inclusion of the exceptional circumstance identified in Section 8.11.2.5 and identified in TRAN POL 5 is premature pending the finalisation of the detailed design on the Carrick to Dromod Transport Solution. The proposed access point as shown in the Draft Plan is not compatible with the N4 Carrick-on-Shannon to Dromod Project or the TEN-T designation of the road. These lands would require to be identified with a suitable land use zoning objective and be assessed through the Local Transport Plan to identify an appropriate means of access. On that basis, this exceptional circumstance will be removed.

In relation to item (ii) and the proposed relocation of the Manorhamilton fire station, it should be noted that the proposal site adjoins a transitional zone of the N16 primary road where the speed limit on the route is limited to 60kmph before dropping further to 50kmph east of the proposal site. As such, the provisions under Section 2.5 of the *Spatial Planning and National Roads Guidelines for Planning Authorities* (2012) apply, whereby a limited level of direct access may be provided. It is expected that an application for consent to An Bord Pleanála will have been submitted to An Bord Pleanála and decided upon before this Draft Plan is finalised and having taken effect.

In response to item (iii), the Planning Authority acknowledges the recommended omission of the reference to "inappropriate" to more closely align with national policy under Section 2.5 of the *Spatial Planning and National Roads Guidelines for Planning Authorities* (2012). Accordingly, there is no objection to this recommendation.

In relation to item (iv), it shall be recommended that RUR SET POL 9 be amended to provide greater distinction between national roads and the R280 Regional Road, with the reference "save for exceptional circumstances where alternative access cannot be achieved" only applying to the R280.

Chief Executive's Recommendation

Recommendation No. 17

Amend Section 8.11.2.5 Exceptional Circumstances as follows

Government policy regarding access onto national roads as provided for in the "*Spatial Planning & National Roads Guidelines*" seeks to avoid the creation of any additional access point from new development/intensification of traffic from existing entrances onto national roads outside the 60 kph speed limit. Section 2.6 of the guidelines provides for exceptional circumstances to the above general policy provision. Planning Authorities may identify stretches of national roads where a less restrictive approach may be applied as part of the Development Plan process. The guidelines provide that a less restrictive approach may be adopted in the case of developments of national and regional strategic importance which by their nature are most appropriately located outside urban areas, and where the



locations concerned have specific characteristics that make them particularly suitable for the developments proposed.

~~It is not the intention of the Planning Authority to identify any such locations in the Draft Plan. It is the intention of the Planning Authority to develop and agree a policy for access off the national roads in conjunction with Transport Infrastructure Ireland in the following instance:~~

- ~~• To facilitate a significant economic development off the N4 National Primary Road east of Carrick-on-Shannon.~~

~~This development is of regional strategic importance and is included in the RSES.~~

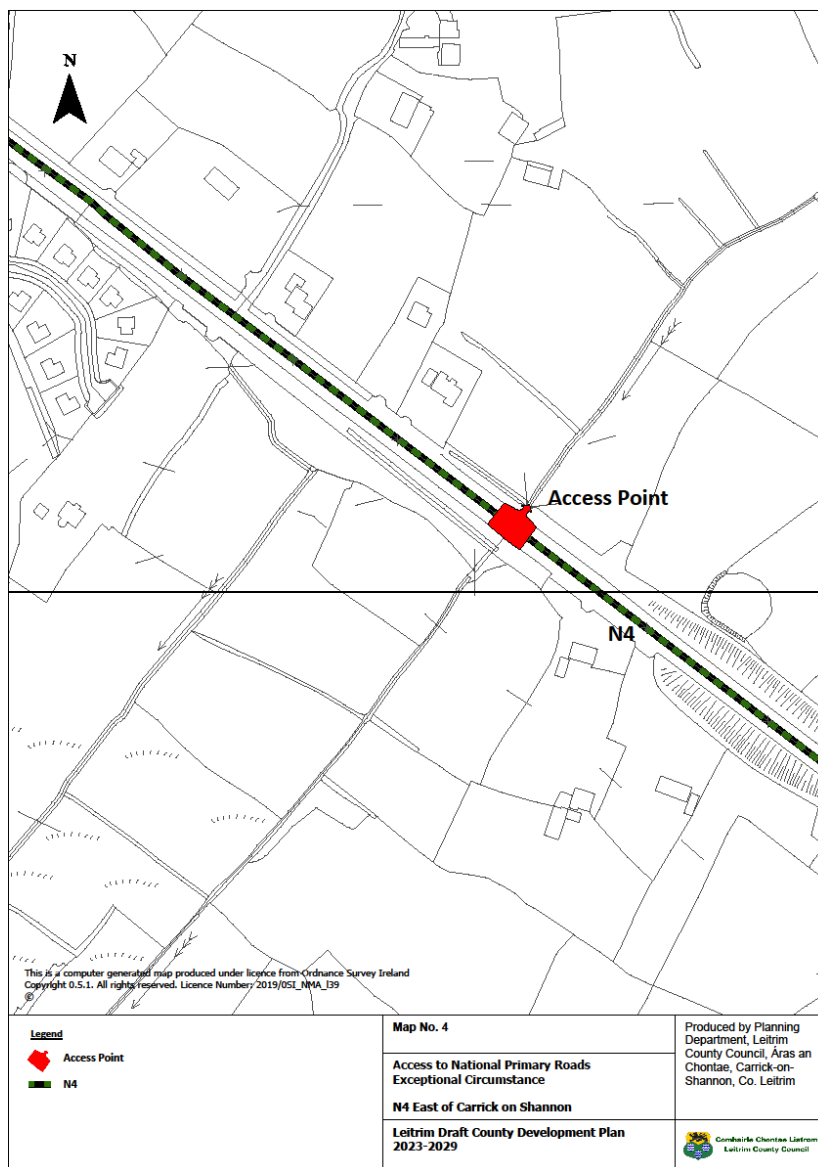
Recommendation No. 18:

Amend TRAN POL 5 as follows:

TRAN POL 5 To avoid the creation of any additional access point from new development/intensification of traffic from existing entrance onto national roads outside the 60kph speed limit, ~~except at the following location:~~

- ~~• N4 east of Carrick-on-Shannon to facilitate a significant economic development[‡] (See Map No. 4 Volume III Book of Maps Access to National Primary Road Exceptional Circumstances which is included at smaller scale below).~~

[‡] This project will subject to the outcome of the Appropriate Assessment process.



Please note that the above map is also included in Volume II Book of Maps – Map No. 4. It shall be removed from the final Book of Maps as well.

Recommendation No. 19:

Amend Policy TRAN POL 2 as follows:

TRAN POL 2 To protect the national road network from inappropriate new access points and the intensification of existing accesses onto or adjacent to national roads in accordance with the requirements of Section 2.5 of Spatial Planning and National Roads Guidelines for Planning Authorities (DECLG,2012) to maintain traffic capacity, minimise traffic hazard and protect and maximise public investment in such roads.

Recommendation No. 20

Amend Policy RUR SET POL 9 as follows:



RUR SET POL 9 To restrict new accesses to serve individual residential developments onto National Roads and the R280, **with access onto the R280 only considered** save for in exceptional circumstances where alternative access cannot be achieved.

3.2.6 Flood Risk Management

Recommendation 9 – Flood Risk Management

Having regard to *The Planning System and Flood Risk Guidelines (2009)* and NPO 57, the Planning Authority is required to:

- (i) review the Enterprise and Employment zoning of c. 1 hectare to the northeast of the town centre of Dromod located within the Constrained Land Area and Flood Zone A (Map 28); and
- (ii) include an additional Infrastructure Objective in each individual settlement plan to restrict development on lands zoned for Tourism and located within Flood Zones A or B to water compatible usages only.

Chief Executive's Response

In response to item (i) of the above recommendation, the proposed zoning of the subject lands was subject to the Justification Test, the findings of which are detailed in Table 8 of the Strategic Flood Risk Assessment (SFRA) of the Draft Plan. The subject lands in Dromod accommodate existing *Enterprise and Employment* uses and have been assessed as passing the Justification Test referenced above. The extent of the curtilage of the former meat processing plant only was included within this land use zoning objective and adjoining greenfield lands excluded from consideration. The former meat factory buildings are derelict and detract from the visual amenities of the adjoining housing development (Mac Oisín Place) but also from the Dublin-Sligo Rail Line. The Planning Authority are engaged with the owner of this site seeking the redevelopment of the site conscious of the vulnerability of future uses to the identified flood risk affecting same.

In relation to item (ii), the Planning Authority acknowledges the merit in this recommendation and has no objection to the inclusion of such an objective in the individual settlement plans where relevant.

Chief Executive's Recommendation

Recommendation No. 21

Insert the following as an additional infrastructure objective in the relevant settlement plans:

Permissible uses for undeveloped lands within Flood Zones A and B that are zoned *Tourism Related Development* in this settlement shall be constrained to those 'water compatible' and 'less vulnerable' uses as appropriate to the particular Flood Zone (please refer to the Flood Risk Management provisions in Volume I of the Draft Plan and to the accompanying Strategic Flood Risk Assessment (SFRA).



3.2.7 Renewable Energy Strategy

Recommendation 10 – Renewable Energy Strategy

In accordance with the provisions of section 28(1C) of the Act, and having regard to the Government's commitment in the *Climate Action Plan 2021* to achieve 80% of electricity from renewable sources by 2030, NPO 55 which promotes renewable energy use and generation to meet national targets towards achieving a low carbon economy by 2050, and section 28 guidelines *Wind Energy Development Guidelines* (2006) and the *Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change* (2017), the Planning Authority is required to revise the Renewable Energy Strategy to omit the use of a 500m separation distance from the limiting factors applied in the sieve mapping analysis, which is inconsistent with item (3) of the SPPR the *Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change* (2017), and revise Map 12.4 'Wind Energy Areas' accordingly.

Chief Executive's Response

The Planning Authority notes the comments of the OPR in relation to this item, and its contention that the use of a 500m separation distance in the sieve mapping analysis undertaken to inform the preparation of the Draft RES is inconsistent with item (3) of the Specific Planning Policy Requirement (SPPR) prescribed in the *Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change* (2017).

To recap, item (2) of the SPPR requires Planning Authorities to indicate "how the implementation of the relevant development plan or local area plan over its effective period will contribute to realising overall national targets on renewable energy and climate change mitigation, and in particular wind energy production and the potential wind energy resource (in megawatts)".

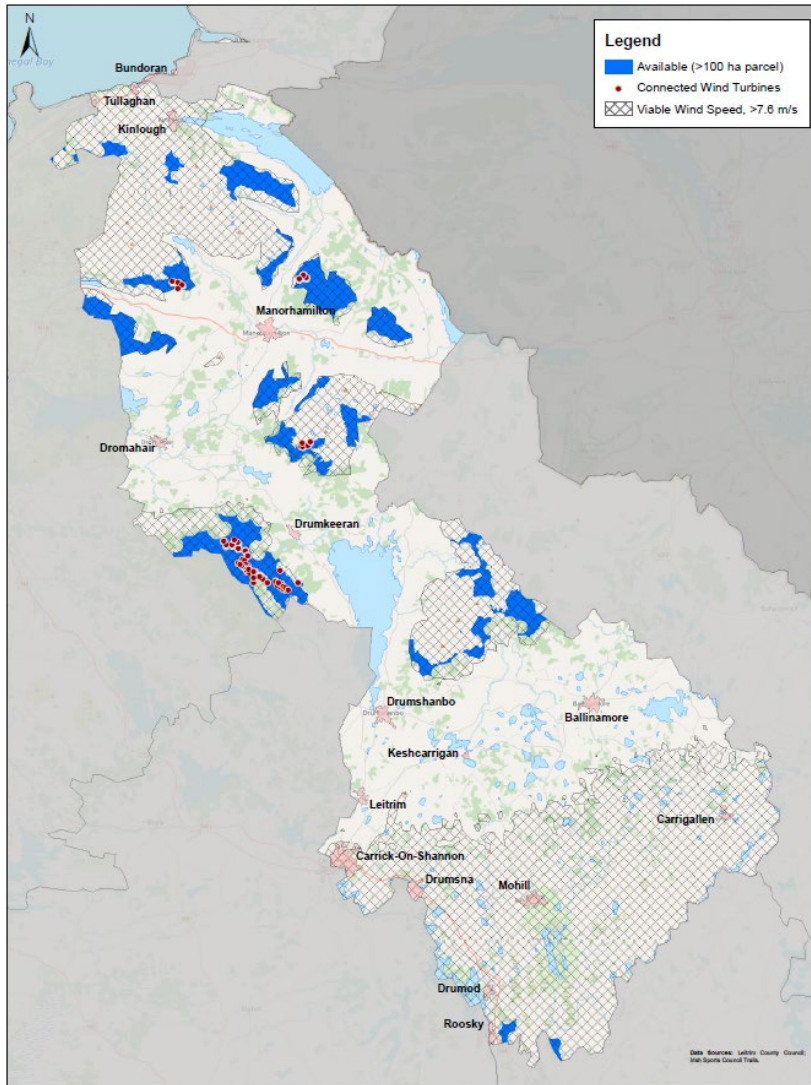
Item (3) of the SPPR requires the Planning Authority to demonstrate "detailed compliance with item number (2) above in any proposal by them to introduce or vary a mandatory setback distance or distances for wind turbines from specified land uses or classes of land use into their development plan or local area plan. Such a proposal shall be subject to environmental assessment requirements, for example under the SEA and Habitats Directives. It shall also be a material consideration in SEA, when taking into account likely significant effects on climatic factors, in addition to other factors such as landscape and air, if a mandatory setback or variation to a mandatory setback proposed by a planning authority in a development plan or local area plan would create a significant limitation or constraint on renewable energy projects, including wind turbines, within the administrative area of the plan".

The Planning Authority submits that in order for it to comply with the requirement of item (2) of the SPPR and the establishment of a realistic wind energy production target (in MW) for the county, a more nuanced approach to the sieve mapping analysis is required. In this regard, the sieve mapping analysis provided for in the Draft RES takes account of established, mandatory setback distances from sensitive receptors (i.e. dwellings) amongst other constraints and facilitators in determining areas of potential wind energy development in the county.

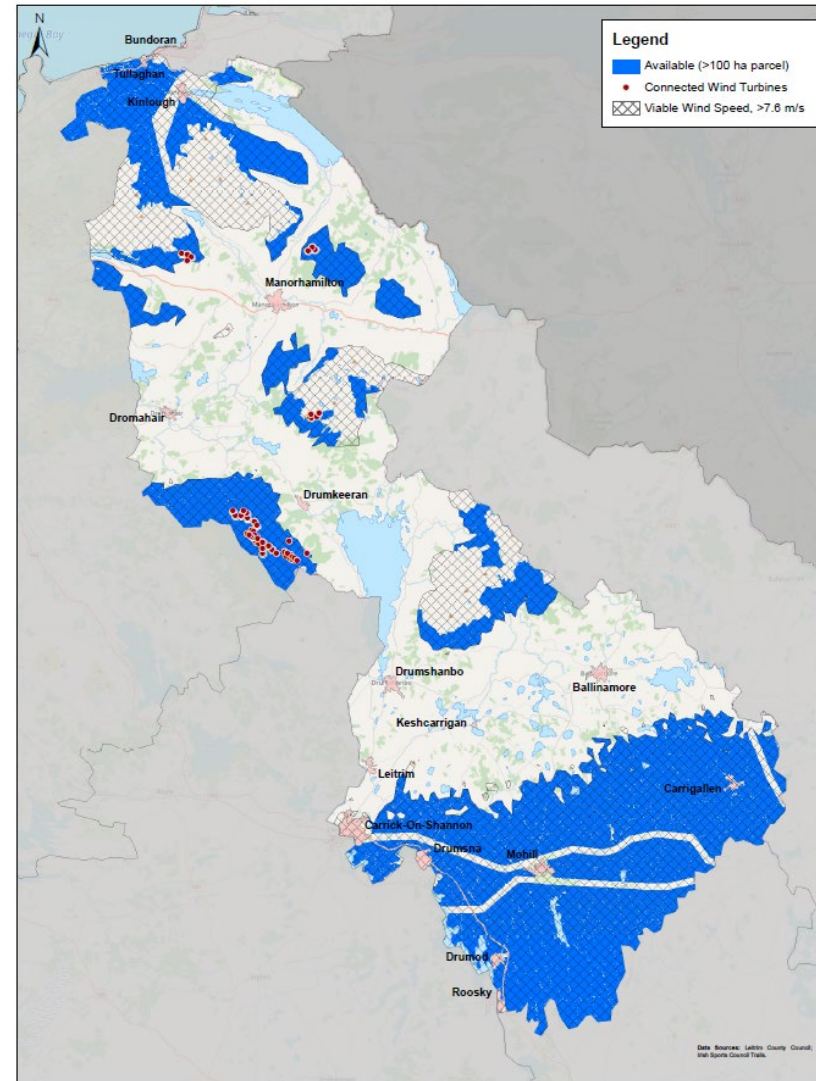
Contrary to the contention of the OPR, the Planning Authority is of the view that this approach does not introduce or vary a mandatory setback distance or distances for wind turbines, as prohibited in item (3) of the SPPR, with the setback distance of 500m employed in the Draft RES accepted as the minimum distance a turbine can be located from a sensitive receptor in the *Wind Energy Development Guidelines* (2006) owing to noise and shadow flicker limits.



Notwithstanding, the Planning Authority acknowledges that the *Draft Revised Wind Energy Development Guidelines (2019)* makes reference to the “*project-level requirement for minimum of 500m setback from individual properties*”, with the inference that such setback distances should not be employed at plan-level. As a result, a GIS mapping exercise has been carried out to remove the 500m setback distance constraint on potential wind energy development, as recommended by the OPR. The resultant map is reproduced as below, alongside the equivalent map that employed a nominal 500m setback distance from sensitive receptors (Figure 6.3 (b) – *Wind Opportunities and Constraints (Parcels > 100ha)* in the Draft RES).



Original Figure 6.3 (b) Wind Available Areas in Draft RES



Revised Figure 6.3 (b) without 500m setback from properties

As can be seen from the above mapping, by removing the 500m setback distance constraint, a significant land area becomes available for consideration, including much of south of the county. The resultant ‘potential wind energy capacity’ within the county increases from 67 MW to 383 MW for areas over 100ha in size (see comparative Tables 3.2.7a and 3.2.7b below):

Table 3.2.7a: Potential Available Areas and Capacity with Mandatory Setback Distance (500m) Imposed

Scenario Description	Risk Level	Area Available (km ²)	Percent of Co. Leitrim land area	Capacity Available (MW)	Capacity Output Potential (GWh)	Capacity Available (MW) at Assumed Delivery Rate of 10%
Mandatory setback distance of 500m imposed on wind turbines from domestic dwellings.	All Risk Excluding SPA, SAC, RAMSAR	96	6.1%	675	1,842	67

Table 3.2.7b: Potential Available Areas and Capacity with Mandatory Setback Distance (500m) Removed

Scenario Description	Risk Level	Area Available (km ²)	Percent of Co. Leitrim land area	Capacity Available (MW)	Capacity Output Potential (GWh)	Capacity Available (MW) at Assumed Delivery Rate of 10%
Mandatory setback distance of 500m wind turbines from domestic dwellings REMOVED	All Risk Excluding SPA, SAC, RAMSAR	547	34.4%	3,829	10,452	383

Translating this exercise into a revised policy and wind energy ‘available areas’ mapping designation creates two distinct problems:

1. The central aim of the sieve mapping and technical analysis is to highlight areas of the county with the potential to accommodate wind energy development, having considered the impact of such developments on landscape/visual constraints amongst other environmental considerations. The corollary also follows that the same analysis highlights areas of the county where prospective wind energy development could be severely constrained by a number of factors. In this regard, greater certainty is provided in identifying areas which are considered more viable in securing planning permission for wind energy development and therefore a greater prospect of securing renewable energy targets identified in policy documents such as the Climate Action Plan 2021.



However, as demonstrated in the original Figure 6.3 (b) Wind Available Areas in Draft RES, locating large-scale commercial wind farm developments would be difficult in large swaths of the county owing to the dispersed rural population and small farm holding sizes which characterise much of the rural areas of the county. Clearly issues such as adhering to noise and shadow flicker criteria will be highly problematic, notwithstanding other environmental considerations, most notably landscape sensitivities as identified in the Dart RES and the accompanying document, *Landscape and Visual Capacity Study for Wind Farms and Wind Turbines*, prepared by RPS Group Ltd.

2. In relation to the aforementioned commissioned landscape and visual capacity study, its development took as its starting point the 'available areas' previously prepared, including the 500m residential buffer. It is not feasible, given the limited duration of the response period, to re-commission a further landscape assessment report in this regard nor does the Planning Authority consider that there would be added value for such an undertaking.

Moreover, it is noted that a similar approach was employed in the development of the Carlow County Renewable Energy Strategy as part of the Carlow County Development Plan 2022-2028, wherein a 500m setback distance from sensitive receptors was employed in the sieve mapping analysis which informed the potential wind energy development areas in that Strategy. It is also noted that in its assessment of the Draft Carlow County Development Plan 2022-2028, and its Draft Renewable Energy Strategy, neither the OPR nor any other Government Department raised any concerns in relation to the approach adopted in the sieve mapping analysis which is identical to the approach utilised in the case of our Draft RES. Indeed, such was the satisfaction of the OPR to the approach provided by Carlow County Council, no recommendation or observation in relation to their renewable energy policy contained in the Draft Carlow County Development Plan 2022-2028 was issued by the OPR in its submission on the same.

In the preparation of the Draft Leitrim County RES, it was assumed that in utilising the approach taken in the Carlow County RES, the OPR would similarly have no issues in the same sieve mapping analysis provided in the Draft RES in the interests of consistency. In this regard, the Planning Authority is unable to explain why a difference of approach has been undertaken in the assessment by the OPR of the same methodology employed by two different Local Authorities.

Notwithstanding, it is recommended that, rather than revising the mapping exercise for available areas, or increasing the wind energy targets without recourse to a revised *Landscape and Visual Capacity Study for Wind Farms and Wind Turbines*, the Plan and associated RES be amended to:

- Provide greater detail on the mapping process carried out to identify 'available areas' – noting that any use of a 500m setback distance is not related to specific guidance but as a means of identifying sites of strategic scale for the purposes of determining, more practically, the renewable energy target for the county as required under item (2) of the SPPR issued under the Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change (2017).
- Note that where landowners and householders are satisfied to live closer to wind turbines than 500 metres, this can be taken into account in project planning.
- Note that projects can be brought forward in other areas, or including land adjacent to 'available areas'
- Note that the targets in the plan do not comprise a 'ceiling' on development.

It is noted that Action 102 of the *Climate Action Plan 2021* includes an objective to develop a new spatial policy for large scale wind and solar development, in support of the 80% RES-E target, and that



this will be implemented through a regional planning initiative. When implemented, this will give counties like Leitrim the platform to review and if necessary, revise upward the renewable electricity targets contained in the Draft Plan.

Chief Executive's Recommendation

Recommendation No. 22

Amend the bullet points provided in the fourth paragraph of Section 12.6.2 *Wind Energy* of Volume I Written Statement of the Draft Plan as follows:

- wind speed and resource.
- environmental, ecological, heritage and amenity constraints by applying an exclusion zone around key biodiversity and physical attributes. Special Protection Area (SPA) and Special Area of Conservation (SAC) sites were excluded, however Natural Heritage Area (NHA) and proposed Natural Heritage Area (pNHA) sites were not excluded. Watercourses and physical constraints were also excluded using buffer distances related to construction activities and safety.
- land take being > 5 km² to take into account the spatial requirements generally for commercially scaled wind farm developments.
- set-back distances from housing using the minimum separation distance of 500m from all sensitive receptors as identified in the 2006 Wind Energy Development Guidelines (WEDG) and the 2019 Draft WEDG and as a means of identifying sites of strategic scale for the purposes of determining, more practically, the renewable energy target for the county as required under item (2) of the Specific Planning Policy Requirement (SPPR) prescribed in the *Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change (2017)*.
- availability of grid infrastructure.

Recommendation No. 23

Insert the following text in Section 12.6.2 after Figure 12.4:

The central aim of the sieve mapping and technical analysis undertaken is to highlight areas of the county with the potential to accommodate wind energy development identified as 'Available Areas' in Figures 6.3 and 6.3b of the *County Leitrim Renewable Energy Strategy*, subject to significant landscape/visual constraints amongst other environmental considerations. Notwithstanding the areas identified in Figures 6.3 and 6.3b of the RES, this does not preclude projects, typically of smaller-scale, from being brought forward in other areas including land adjacent to 'Available Areas', subject to other project-specific environmental considerations and assessments.

Moreover, it is accepted that that minimum setback distances from sensitive receptors (i.e. dwellings) can be relaxed where wind energy project developers can demonstrate the written consent of affected landowners and householders and which can be taken into consideration in the assessment of any planning application for wind energy development where this arises.

Recommendation No. 24

Insert the following text in Section 12.6.2 after Table 12.3:

Notwithstanding the targets provided above in Table 12.3, it should be noted that the figures provided do not represent a 'ceiling' or 'cap' on the potential of renewable energy that can be generated in the county up to 2030. The figures provided are seen as practicable and achievable targets for the county over this period. Moreover, the Plan notes the provisions of Action 102 of the Climate Action Plan 2021 which includes an objective to develop a new spatial policy for large scale wind and solar



development, in support of the target to increase the share of electricity demand generated from renewable sources to up to 80% and that this will be implemented through a regional planning initiative. When implemented, this will give counties like Leitrim the platform to review and if necessary, revise upward the renewable electricity targets contained in this Draft Plan.

Recommendation No. 25

Amend and update the *County Leitrim Renewable Energy Strategy* provided in Appendix IX of the Plan to take account of the amendments prompted as a result of Recommendation Nos. 22 – 24 of this Chief Executive’s Report.

3.2.8 Environment, Heritage and Amenities

Recommendation 11 – Rights of Way

To ensure compliance with section 10(2)(o) of the *Planning and Development Act 2000*, as amended, the Planning Authority is requested to include a list and map identifying public rights of way.

Chief Executive’s Response:

The Planning Authority acknowledges the provisions of section 10(2)(o) of the Act and the requirements of the Plan to identify public rights of way through the inclusion of a list and map. In this regard, it is noted that a definitive list or mapping of existing public rights of way in the county has not previously been created or adopted in the existing County Development Plan 2015-2021. In the absence of a baseline of previously documented public rights of way in the county, it is considered prudent to undertake an extensive review of such rights and the consideration of the merits of creating new public rights of way also.

Objective TOU OBJ 5 of the Draft Plan provides the commitment to undertake such a review and to “*identify, preserve and enhance existing accesses and public rights of way to recreational area including the coast, upland areas, lakeshores, river-bank areas and heritage sites*”.

Given the legal complexities and the need for an extensive resource allocation in this undertaking, in terms of reviewing the Land Registry, Registry of Deeds, identifying and notifying affected landowners, site assessments and mapping, it is considered that such a review should be conducted separately to the review of the County Development Plan. Moreover, it is anticipated that this review will be informed by a separate public consultation process whereby members of the public and relevant stakeholders will be invited to submit details of known and possible public rights of way, subject to investigation and verification by the Planning Authority, for potential inclusion on any list and map of public rights of way generated from this process.

Accordingly, it is considered that Objective TOU OBJ 5 be amended to reflect the anticipated review process more closely, with a commitment to commence the review within one year following the adoption of the County Development Plan.

Chief Executive’s Recommendation

Recommendation No. 26

Amend Objective TOU POL 5 as follows:

TOUR OBJ 5 The Council, within **two years of the coming into effect of the County Development Plan** ~~the lifetime of this Plan aim to~~ **shall commence a process to identify, list and map**

~~public rights of way which give access~~ ~~preserve and enhance existing accesses and~~ ~~public rights of way~~ to recreational areas including the coast, upland areas, lakeshores, river-bank areas, and heritage sites **or other places of natural beauty or recreational utility.** When finalised, the Council will seek to preserve and enhance such existing accesses and public rights of way. The resultant list and map will then be inserted into the County Development Plan 2023-2029 by way of variation.

3.2.9 Implementation and Monitoring

Observation 4 – Monitoring

Having regard to the duty and function of the Planning Authority under section 15(1) and 15(2) of the Planning and Development Act 2000, as amended, and the commitment of the Planning Authority to secure and monitor the implementation of the strategies, policies and objectives of the draft Plan, the Office advises the Planning Authority to include proposals for monitoring, consistent with Part 10 of the Development Plans, Guidelines for Planning Authorities - Draft for Consultation (2021).

Chief Executive's Response

Section 1.8 of the Draft Plan deals with Monitoring and Implementation. The existing context does make reference to the requirements of Section 15 (2) of the Planning and Development Act 2000 (as amended), which outlines the requirement to submit a report to Members of the Planning Authority on the progress achieved in securing the objectives of the Plan. The recently published Development Plans Guidelines for Planning Authorities (2022) outline a number of additional monitoring tools which will assess the success with which the development plan is being implemented. The Planning Authority is committed to carry out prescribed monitoring of the Plan.

In implementation of the Plan, all policies and objectives will be applied and all successful applications for development shall be in accordance with the policies and objectives of the Plan and the proper planning and sustainable development of the area. With regard to monitoring, the Council will fully accord with all statutory requirements.

Chief Executive's Recommendation

Recommendation No. 27

To amend Section 1.8 'Implementation and Monitoring' of the Draft Plan as follows:

Implementation

Leitrim County Council is fully committed to securing and monitoring the implementation of the key aims and objectives of this Plan. **The Development Plan is the key strategy to structure the development of Co. Leitrim over the six-year statutory time period of the plan. It seeks to address the physical, economic, social and environmental needs of the community, in terms of supporting structured new development, enhancing valued assets and amenities and protecting the environment.** The Council will continue to occupy a leadership role to progress and secure the Plan policies and objectives to achieve the sustainable development of the county. **The implementation of the Development Plan is a key strategic focus for Leitrim County Council and requires a concerted range of actions by the entire organisation in order to be successfully implemented. The Local Authority will need to utilise its wide range of statutory powers and responsibilities to achieve the objectives of the development plan.** The successful implementation of a significant number of the policies and objectives of this Draft Plan will necessitate on-going collaboration and support from

across a range of agencies and stakeholders. The implementation of this Plan will depend also on the economic climate, political support and the availability of funding from various sources including by the Council itself.

The Planning Department of the Council is the main section responsible for monitoring the implementation of the Plan. However, it is important to note that this Plan co-ordinates the work and objectives of other key departments within Leitrim County Council, such as Economic Development, Local Economic Office, Tourism, Community, Roads, Environment and Emergency Services. In some cases, responsibility for the implementation of certain objectives may be external, such as by Irish Water, Waterways Ireland and Transport Infrastructure Ireland. In addition to those interdependencies, the achievement of certain objectives is also influenced by factors that are outside the control of the Council, including international and national economic circumstances, government funding and private sector investment confidence in the economy. This is most evident in the area of building affordable houses. In fulfilling the development management function of assessing individual planning application, this will be central to the implementation of the Plan objectives with regard to management of land and uses.

Ensuring resources and establishing systems to effectively perform this monitoring and analysis function is therefore a key responsibility of the Planning Authority. A new approach to plan implementation and monitoring is required from that previously in place for the 2015-2021 County Development Plan. An effective development plan process will involve a positive cycle of policy development with measurable indicators formulated, implementation activities led by the Local Authority, monitoring, reporting and policy analysis.

Monitoring

The objectives detailed in this *County Development Plan* have been developed where possible to be specific, achievable and measurable. Much of the data required for effective monitoring and evaluation will be readily available within Leitrim County Council, including established linkages between planning application databases and GIS. Utilisation of established mechanisms of this nature will facilitate on-going data capture and a spatial expression of results. This will be used in the preparation of a monitoring and evaluation report on the implementation of the Plan. In other instances, it will require the setting up and management of data capturing by other departments including the Housing and Environment Departments.

In order to assess the success with which the development plan is being implemented, the Planning Authority commits to establishing a frequent, reliable and ongoing monitoring system for our new Draft Plan as a permanent function.

This will comprise

- a) Core Strategy Monitoring
- b) Plan Objectives Monitoring (including SEA Monitoring)

Core Strategy Monitoring (Annual)

The development plan has a primary role in land use and spatial development policy and in particular regarding the provision of new housing development. The monitoring role must provide a focus on development patterns occurring under the settlement strategy of the development plan and the tracking of the nature of new development that is occurring.

The Planning Authority will report on these planning and development trends and analyse these trends spatially, with accompanying mapping, to illustrate the development trends being experienced



at settlement level and to assess the consistency of such trends with the agreed housing and population targets as set out in the Core Strategy of the development plan. The data required for successful monitoring will be a mixture of information readily available in Leitrim County Council (e.g. from the development management function) and from externally/independently provided sources (e.g. CSO).

This 'Core Strategy Monitoring' shall occur annually and include the indicators contained in the recently published Development Plan Guidelines as applicable.

Plan Objectives Monitoring

Under the provisions of Section 15(2) of the Planning and Development Act 2000 (as amended), the Council has a statutory obligation to secure the implementation of the objectives of the Plan and to prepare a progress report on achieving the objectives not more than 2 years after the making of this Plan.

The objectives to be included in the 2 year progress report must include indicators that are that aligned with reporting for other related national policies (e.g. climate change, water quality, etc) or for the purposes of monitoring the SEA. The monitoring of the significant environmental effects of the implementation of the plan is a statutory requirement of the SEA Directive and the planning authority shall refer to the EPA's guidance document '*Guidance on Strategic Environmental Assessment (SEA) Statements and Monitoring*' and any future review.

Additionally, under Section 22A (2) of the Planning and Development Act 2000 (as amended), each Local Authority within the Regional Assembly is required, every 2 years, to prepare and submit a report to the Assembly setting out progress made in supporting objectives, relevant to that authority, contained in the RSES.

3.2.10 General and Procedural Matters

Observation 5 – Mapping

The Planning Authority is requested to include the zoning objectives from the draft Cavan County Development Plan 2022-2028, across the River Shannon, on Map No. 35 for Dowra, and include the zoning objectives from the Roscommon County Development Plan 2022-2028, again across the River Shannon, on Map No. 48 for Roosky.

Chief Executive's Response:

No objection to this observation. The updated Plan shall include the zoning objectives for Dowra and Roosky as contained in the Cavan County Development Plan 2022-2028 and Roscommon County Development Plan 2022-2028 respectively.

Chief Executive's Recommendation

Recommendation No. 28

Amend Map No. 35, *Dowra Land Use Zoning and Objectives Map* to include the zoning objectives from the Cavan County Development Plan 2022-2028 for those areas of the settlement located within its functional area.



Recommendation No. 29

Amend Map No. 48, *Roosky Land Use Zoning and Objectives Map* to include the zoning objectives from the Roscommon County Development Plan 2022-2028 for those areas of the settlement located within its functional area.

SECTION 4
NORTHERN AND WESTERN
REGIONAL ASSEMBLY
SUBMISSION



4 NORTHERN AND WESTERN REGIONAL ASSEMBLY SUBMISSION

Submission Ref. No. DLCDP-57

4.1 Introduction

This section provides a summary of the issues raised by the Northern and Western Regional Assembly (NWRA) and the respective responses and recommendations of the Chief Executive to the issues raised in its submission. The responses and recommendations provided in respect of this submission should be read in conjunction with those provided in respect of the submission from the Office of the Planning Regulator (OPR) under Submission Ref. No. **DLCDP - 197**.

4.2 Summary of Submission and Response of Chief Executive

The submission reiterates the statutory requirement of the Assembly, under Section 27B of the Planning and Development Act 2000, as amended, to offer its opinion on whether or not the Draft Plan and its Core Strategy, in particular, is consistent with the Regional Spatial and Economic Strategy (RSES) and its objectives and to make recommendations to the Planning Authority on any amendments necessary to ensure such consistency is achieved in the Draft Plan.

The submission commends the Draft Plan as being a very well-constructed series of documents which is clear in its presentation and its ambitions for Co. Leitrim, with particular regard given to the clarity of the Landscape Character Maps which accompany the Draft Plan. The submission also notes that there may be an opportunity to reduce the volume of text contained within the Draft Plan, particularly in instances where references have been made to policy context.

The submission from the NWRA provides a chapter-by-chapter overview of the Draft Plan with some accompanying appraisal commentary on the level of conformity of policies and objectives contained within the Draft Plan with regional equivalents as expressed in the RSES.

In general, the submission states that the Assembly is satisfied that the Draft Plan is consistent with the policy objectives in the RSES and acknowledges the quality and clarity of the documentation published in the Draft Plan. The submission concludes by providing a series of observations and one recommendation on the Draft Plan content to ensure enhanced consistency with the RSES.

Whilst it is noted that the submission does not provide a distinction between the stated '*recommendation*' and '*observations*', the following provides a response to the submission from the NWRA to the individual recommendation and observations provided, in the interests of clarity and consistent the approach taken in respect of the foregoing OPR submission.

4.2.1 Recommendation

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

Chief Executive's Response

This item has been addressed in the response to Recommendation 8 of the OPR submission.



Chief Executive's Recommendation

Refer to Section 3.2.5 and associated **Recommendation No. 20** in response to Recommendation 8 of the OPR submission.

4.2.2 Observation 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.

Chief Executive's Response

The Planning Authority acknowledges that the scope of themes addressed in the Draft Plan gives rise to a large volume of text, particularly in the Written Statement. In preparing the Draft Plan, the Planning Authority has recognised the importance of striking a balance between fulfilling its statutory functions in addressing the mandatory objectives to be contained in the Draft Plan under Section 10 of the Planning and Development Act 2000, as amended, and providing a document that is accessible and coherent for readers of different backgrounds. It should also be noted that this is the first Draft Plan prepared since the introduction of significant national and regional planning policy in the form of the NPF and the RSES. As such, it is the view of the Planning Authority that appropriate context should be given to these policy documents given the role the Draft Plan has in transposing such policies into a local context.

Efforts have been made to reduce the level of policy context within the Volume I of the Draft Plan, particularly in relation to Climate Change and Renewable Energy where there is a significant suite of policy documents addressing these themes, by omitting such references in the Written Statement and including appropriate policy context reference as an Appendix (see Appendix X of the Draft Plan). Notwithstanding, a further review of the Draft Plan will be undertaken with a view to reducing the volume of policy context recorded in the Written Statement and expanding Appendix X of the Draft Plan to address policy context references in the Written Statement. It is not considered that the removal of such policy summaries would be considered a material change which needs to be highlighted within the Chief Executives report or indeed Material Alterations when placed on public display.

Chief Executive's Recommendation

Recommendation No. 30

Review Volume I of the Draft Plan (Written Statement) with a view to reducing the volume of policy context recorded in the Written Statement and expanding Appendix X of the Draft Plan to address policy context references in the Written Statement.

4.2.3 Observation 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.



Chief Executive's Response

Refer to Section 3.2.2 and associated recommendation in response to Recommendation 1 of the OPR submission, in which the programme for the future preparation of a new Local Area Plan for Carrick-on-Shannon has been discussed in detail.

Chief Executive's Recommendation

Refer to Section 3.2.2 and response to Recommendation 1 of the OPR submission.

4.2.4 Observation 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 (i.e. in towns/villages under 1,500 population and rural areas/countryside).

Chief Executive's Response

Section 2.8 *Rural Housing* of the Draft Plan makes appropriate reference to the requirements of RPO 3.3, as well as reference to the inclusion of an objective to give effect to RPO 3.3 in Section 3 *Housing Strategy* of the Draft Plan. Objective RUR SET OBJ 3 seeks to “encourage the appropriate re-use and adaptation of the existing rural residential building stock in preference to new build where practicable”. It is accepted that RUR SET OBJ 3 does not explicitly give expression to RPO 3.3 and therefore it is recommended that an additional objective be included in the Draft Plan to address this.

Chief Executive's Recommendation

Recommendation No. 31

Insert the following objective in Section 3.17 *Rural Settlement Strategy* of the Draft Plan with subsequent objectives to be renumbered appropriately:

RUR SET OBJ 4 To support the ongoing monitoring of new rural housing to ensure 20% of new rural development occurs on brownfield sites including partially previously developed sites (i.e. in towns/villages under 1,500 population and rural areas/countryside).

4.2.5 Observation 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.

Chief Executive's Response

The Draft Plan has identified a number of serviced sites within the smaller towns and villages as well as some of the defined ‘*graig*’ settlements as contained within the respective draft settlement zoning maps. Moreover, the Draft Plan also contains a number of policies and objectives which aim to facilitate and support the principle of development on serviced lands as an alternative to the provision of one-off rural housing, namely:



- RUR SET POL 1** To regenerate small towns, rural villages and graigs by providing serviced sites for individual rural dwellings as a viable alternative to one-off housing in the open countryside.
- RUR SET OBJ 1** To support the development of serviced sites within the existing footprint of rural settlements (small towns, rural villages and graigs) to provide for rural living and ensure vitality of rural communities.
- RUR SET OBJ 7** To pursue active land management measures by Leitrim County Council in the delivery of serviced sites to ensure that where a demonstrated demand exists and where attempts have failed by perspective applicants to acquire such sites. The pursuit of such active land management measures is subject to the availability of the necessary funding and resources being available and the confirmation of the availability of necessary piped water services or acceptable means of treating wastewater in an environmentally acceptable manner. The realisation of this objective may require a prioritisation being agreed of certain centres progressing ahead of others.
- WI OBJ 6** To facilitate the servicing of rural villages and graigs to include the development of serviced sites as an alternative to one-off housing in the countryside.

It is respectfully considered that RUR SET OBJ 7 is clear that Leitrim County Council will lead on this initiative. It is equally considered that the 2 year progress report required to be prepared by the Chief Executive will provide an update on success in realising this objective.

The identification, and subsequent rollout, of any new serviced sites within smaller towns and villages is subject to the availability of capital and resources from Irish Water as they are the regulatory authority. Such a process will necessitate engagement and co-operation with Irish Water. The Draft Plan also contains the following specific objective:

- CS OBJ 15** To promote and support the provision of serviced sites in line with investment opportunities by Irish Water in order to attract people to build their own homes and live in villages and graigs, supporting the retention of services in such centres and as a viable alternative to one off housing in the countryside.

In terms of the extent of serviced sites, the Draft Plan provides for a proportionate allocation of forecasted residential units in its Core Strategy reflecting the status of settlements within their designated settlement tiers. In this regard, a sufficient level of housing provision is forecasted for lower tier settlements (Tier 3 – Key Villages and Tier 4 – Villages), with a total of 254 no. housing units proposed for allocation for these areas over the plan period. It is considered that the serviced lands identified in such settlements provide for significant scope in accommodating the construction of individual houses at a density level that is commensurate with existing development patterns and provide for an attractive alternative to rural, one-off housing.

As demonstrated from the above, it is considered that the Draft Plan provides appropriate policy support and detail on the provision of serviced sites.

Chief Executive's Recommendation

No change to the Draft Plan.

4.2.6 Observation 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.

Chief Executive's Response

Section 15 (2) of the Planning and Development Act 2000 (as amended), outlines the requirement to submit a report to Members of the Authority on the progress achieved in securing the objectives of the Plan. The recently published Draft Development Plans Guidelines for Planning Authorities (2021) outline a number of additional monitoring tools which will assess the success with which the development plan is being implemented. The Planning Authority is committed to carry out prescribed monitoring of the Plan.

Chief Executive's Recommendation

No change to the Draft Plan.

4.2.7 Observation 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 timeframes.

Chief Executive's Response

The Draft Plan contains a number of policy measures within the Draft Plan in support of the principle of greenway and blueway development, given the clear tourism and amenity benefits associated with such proposals as well as the positive contribution such pieces of infrastructure can make towards more active, sustainable modes of travel. Both the Written Statement (Volume I) and Settlement Plans (Volume II) of the Draft Plan also provide policy support for identified greenway and blueway projects in the county.

Notwithstanding, the development of such projects is typically through a collaborative approach involving a number of stakeholders such as partnering Local Authorities, Waterways Ireland, Fáilte Ireland, local community groups and landowners amongst others. Equally such developments are heavily dependent on funding allocations and grant awards from central exchequer resources.

Given the various stages that must be overcome in developing such projects, i.e. obtaining planning consent whether through planning permission, a Part VIII public consultation process or necessitating submission for consent to An Bord Pleanála, associated environmental and ecological assessments, securing funding and associated application processes, landowners consents/agreements or acquisition through compulsory purchase, contractor tendering processes etc., there is a high degree of uncertainty in identifying timeframes for the delivery of such projects and the inclusion of such details is respectfully considered wholly premature.

Similarly, the identification or mapping of prospective greenway or blueway routes is premature pending the resolution of processes outlined above, principally securing land access and the undertaking of environmental and ecological assessments.

Chief Executive's Recommendation

No change to the Draft Plan.

4.2.8 Observation 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.

Chief Executive's Response

No objection to the suggested modification to Section 12.6.4.

Chief Executive's Recommendation

Recommendation No. 32

Insert the following text in Section 12.6.4:

Bioenergy forms part of a wider bioeconomy framework which comprises those parts of the economy that use biological resources from land and sea to produce food, feed and bio-based materials and energy. The National Policy Statement on the Bioeconomy (Government of Ireland, 2018) sets out the ambition for Ireland to be a global leader for the bio-economy, through a co-ordinated approach that harnesses Ireland's natural resources, and competitive advantage. It seeks to promote greater coherence between the sectors of the bio-economy, to strengthen the development of bio-based products and grow the relevant markets for them, and to access funding available at EU level as well as leveraging private investment. Moreover, the NPF and the RSES highlight the potential of the bioeconomy in promoting more efficient use of renewable resources and in supporting rural economic development and employment.

Insert the following policies in Section 12.6.4 of the Draft Plan:

- BE POL 5** To support the National Policy Statement on the Bioeconomy (Government of Ireland, 2018) and any review thereof, having consideration to the strategic importance of the bio-economy to rural Co. Leitrim and support the NWRA in its preparation of a feasibility study for the Northern and Western Region to identify (and map) areas of potential growth to inform the National Transition Agenda, enabling a Low Carbon, resilient nation.
- BE POL 6** To support, in principle, the development of appropriately scaled local multi-feedstock bio-refining hubs across the region as well as the potential creation of bio-districts/clusters.

SECTION 5
SUBMISSIONS FROM
PRESCRIBED BODIES



5 SUBMISSIONS FROM PRESCRIBED BODIES

5.1 Introduction

This section provides a summary of the issues raised in the submissions from prescribed bodies on the content of the Draft Plan, as well as the respective responses and recommendations of the Chief Executive to the issues raised in each of the submissions.

5.2 Department of Education

Submission Ref. No. DLCDP-194

The submission notes and welcomes the education policies and objectives provided in the Draft Plan, and in particular ED POL 2, ED POL 5 and ED OBJ 1. In noting the importance of the existing school network for meeting future requirements, the submission provides a suggested additional objective to be included in the Draft Plan in this regard as follows:

To ensure that existing school sites are protected for educational use and that land buffers adjacent to existing schools are protected for future educational use in order to allow for the expansion of these schools, if required, subject to site suitability.

The submission cites Department policy to intensively use the sites of existing schools so that their potential is maximised to meet educational requirements arising from infill and compact development in existing settlements. The submission requests that in respect of existing schools, the entire site (buildings, play areas and any green areas) be zoned and mapped for educational use. Specific comments have been provided in relation to the likely future education needs in a number of settlements with the submission stating that the primary and post-primary potential additional requirements arising from the projected population increase can be met at existing facilities.

Chief Executive's Response

The contents are noted and the support of the policies in place is welcomed. The Planning Authority recognises that the principle of compact growth as promoted at national, regional and local level may require an expansion to and/or maximising use of existing school sites. Therefore, in addition to new school development, the Council will support the appropriate development and/or redevelopment of existing schools within the county.

In relation to the suggested additional policy, it is considered that Policy ED POL 5 in the Draft Plan already provides sufficient policy support in this regard. Moreover, in relation to the request for school sites and their entirety to be zoned education, the Draft Plan prescribes a land use zoning objective of *Social and Community* with the objective to “*protect and provide for community, social, recreational and educational services and facilities*”. It is considered that this land use zoning objective adequately addresses this issue.

Chief Executive's Recommendation

No change to the Draft Plan.



5.3 Environmental Protection Agency

Submission Ref. No. DLCDP-13

The submission emphasises the role and function of the Environmental Protection Agency (EPA) and its approach to land use plans and associated Strategic Environmental Assessment (SEA). The submission provides a number of generalised comments in relation to the Environmental Report of the SEA which are summarised as follows:

1. Mitigation Measures – appropriate mitigation measures should be provided with the Plan including clear commitments to implement mitigation measures.
2. Monitoring – the Monitoring Programme should be flexible to take account of specific environmental issues and unforeseen adverse impacts, including the possibility of cumulative effects.

The submission also notes that the recommendations, key issues and challenges outlined in the EPA's report, *'State of the Environment Report – Ireland's Environmental – An Integrated Assessment 2020'* (EPA, 2020) should be taken into account when finalising and integrating the findings of the SEA into the Plan. Furthermore, any future amendments to the Plan should be screened for likely significant effects, with an SEA statement prepared for the adopted Plan that summarises:

- How environmental considerations have been integrated into the Plan;
- How the Environmental Report, submissions, observations and consultations have been taken into account during the preparation of the Plan;
- The reasons for choosing the Plan adopted in the light of other reasonable alternatives dealt with; and,
- The measures decided upon to monitor the significant environmental effects of implementation of the Plan.

The EPA has also attached its previous submission at pre-draft stage of the plan-making process, which includes references to the suite of guidance documents and resources available from the EPA including its document, *'SEA of Local Authority Land Use Plans – EPA Recommendations and Resources'*, the Environmental Sensitivity Mapping (ESM) Webtool, the EPA SEA WebGIS Tool, the EPA WFD Application and the EPA AA GeoTool.

The submission also highlights the requirement for the Plan to align with national commitments on climate change and the overall transition to a low carbon, climate resilient economy and society, as well as the need to consult with the relevant Environmental Authorities during the plan-making process as required under the SEA Regulations.

Chief Executive's Response

The contents of the submission are noted and welcomed. The recommendations, key issues and challenges described within the current version of EPA's report, *'State of the Environment Report – Ireland's Environmental – An Integrated Assessment 2020'* have been considered in the preparation of the Plan and SEA and will be considered, as relevant, for reference throughout the SEA and Appropriate Assessment (AA) processes.

The required information on monitoring measures is provided in Section 10 of the SEA Environmental Report - this will inform the final Programme to be included in the SEA Statement. The cited guidance has been and will continue to be taken into account in undertaking the SEA and finalising the Draft Plan.



An SEA Statement containing the required information will be prepared at the end of the process. The cited guidance will be taken into account in preparing the SEA Statement. The environmental authorities cited in the submission are being consulted with as part of the SEA/Plan preparation process.

In respect of the referenced suite of guidance documents and resources, these have been considered in the undertaking of the SEA and AA and will be accessed, as relevant, for reference throughout the SEA and AA processes.

The Draft Plan also aligns with national commitments on climate change and adaptation, as well as relevant sectoral, regional and local adaptation plans.

Chief Executive's Recommendation

Recommendation No. 33

Update Section 9 of the SEA Environmental Report once recommendations are integrated into the Plan and policy/objective reference numbers are available.



5.4 Fermanagh & Omagh District Council

Submission Ref. No. DLCDP-18

The submission references a specific request from members of Fermanagh & Omagh District Council (FODC) that the historical importance of Kiltyclogher and particularly Seán Mac Diarmada's homestead be recognised in the Plan. Reference is also made to the FODC Local Development Plan 2030 – Draft Plan Strategy and the need to have regard to its contents prior to making the Plan.

The submission welcomes the recognition given in the Draft Plan to the opportunities for co-operation and collaboration in the cross-border area in relation to a number of key areas such as protection of the environmental assets, tourism and recreation, economic development, climate change and sustainable transport. Collaboration is also encouraged in relation to shared tourism assets such as the Shannon-Erne Waterway, Cuilcagh Mountain, Lough Melvin and Lough MacNea.

FODC welcomes the approach provided in the Draft Plan to the policy provisions for protecting natural heritage features along our mutual boundaries, as well as the promotion of the greenway on the former Sligo Leitrim North Counties Railway (SLNCR) line.

Reference is also made to the Draft Renewable Energy Strategy (RES), with the approach detailed in the RES welcomed by FODC as it aligns with their approach, with no conflict in relation to wind energy capacity along the common boundary. FODC references that consideration should be given to sensitivities of landscapes, visual impact, environmental impact and impact on public health and amenity within the FODC functional area.

The submission welcomes a number of policies and objectives relating to the extractive industries and the development of co-working spaces/hubs, digital hubs/eHubs and eWorking centres throughout the county.

FODC also requests that Leitrim County Council consult the Department of Agriculture, Environment and Rural Affairs, part of the Northern Ireland Executive in its role as statutory nature conservation body as it has overall responsibility for designation, management and monitoring of European sites, if it has not done so already.

Chief Executive's Response

The contents are noted and welcomed. The submission outlines the importance of a close working relationship between our two organisations. The Draft Plan outlines a number of development areas, as well as associated policies and objectives, which provide the basis for further engagement with FODC on projects/issues of strategic benefit to both areas and fostering greater cross-border collaboration. The Chief Executive is satisfied that the Kiltyclogher Settlement Plan acknowledges the historical importance of Seán Mac Diarmada's homestead and his connection to the village of Kiltyclogher. The Planning Authority did not consult with the Department of Agriculture, Environment and Rural Affairs in Northern Ireland as they are not included in the list of statutory bodies which the Planning Authority is required to consult with.

Chief Executive's Recommendation

No change to the Draft Plan.



5.5 Transport Infrastructure Ireland

Submission Ref. No. DLCDP-23

The submission addresses a number of development themes associated with the Draft Plan, with a series of recommendations issued for consideration. Given its statutory function, the majority of the recommendations from Transport Infrastructure Ireland (TII) relate to enhanced reference to national spatial planning policy in respect of access onto the national road network and associated safety, capacity and strategic function of the network. The following provides an overview of the development themes addressed in the submission:

1. Managing Exchequer Investment and Statutory Guidance

Core Strategy

The submission references a series of national policy requirements in respect of improving and protecting key transport corridors, including the Trans-European Transport Networks (TEN-T), of which the N4, N15 and N16 are all part of. In this regard, TII recommend the inclusion of additional 'Core Strategy Policies and Objectives' in Section 2.11 of the Draft Plan to reflect and have regard to national policy and summarised as:

- *To maintain the strategic function, capacity and safety of the national roads network; and*
- *To ensure that the existing extensive transport networks, which have been greatly enhanced over the last two decades, are maintained to a high level to ensure quality levels of service, safety, accessibility and connectivity to transport users.*

Local Area Plan/Local Transport Plan/Area Based Transport Assessment

TII welcomes the commitment to future local area planning and undertaking a Local Transport Plan (LTP) for Carrick-on-Shannon. TII agrees that the preparation of a LTP should be integral to the forward planning/Local Area Plan process and undertaken in accordance with the TII/NTA Area Based Transport Assessment (ABTA) Guidance as advocated in Objectives CS OBJ 9, MSSM OBJ 1 and TRAN OBJ 13 of the Draft Plan. TII would welcome and support consultation of the preparation of such plans and considers that findings and recommendations of the LTP process, undertaken in accordance with ABTA, should be incorporated into the preparation of the Carrick-on-Shannon Joint Local Area Plans.

2. Section 28 Guidance: Spatial Planning and National Roads Guidelines

Access to National Roads

Similar to Recommendation 8 of the OPR submission, TII considers the use of the term "inappropriate" in the context of TRANS POL 2 does not wholly reflect the provisions of official policy provided in Section 2.5 of the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012), and have requested its omission from the policy wording. Similarly, TII considers that proposed policy RUR SET POL 9 should be amended to omit the wording, "save for exceptional circumstances where alternative access cannot be achieved", in order to more accurately reflect Government policy as set out in Section 2.6 of the guidelines.

'Exceptional Circumstances'

TII would welcome consideration by the Council of the following:

- Including the proposed 'exceptional circumstances' in the Development Plan on the N4 in the form currently presented in advance of undertaking an evidence-based analysis is considered inappropriate and in conflict with the provisions of Section 2.6 of the Section 28 Ministerial



Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012).

- TII is available to assist the Council in the development of proposals for consideration as 'exceptional circumstances' cases in accordance with the provisions of the DoECLG Guidelines.

Rural Settlement Strategy

The submission requests the inclusion of a cross reference in Section 3.17 of the Draft Plan referring to Policy TRAN POL 2 in the interests of providing clarification and early assistance to applicants in the preparation of any rural housing planning application where there may be implications for the strategic national road network in the area.

Rural Economic Development Strategy

TII requests that an appropriate policy be included in Section 10.4 – *Rural Economy* of the Draft Plan in the interests of safeguarding the safety and operation of the national road network and to provide clarity for future applicants/developers in relation to relevant development proposals with the potential to impact on the national road network. The submission includes a suggested policy wording as follows:

"The policy of the Planning Authority will be to avoid the creation of any additional access point from new development or the generation of increased traffic from existing accesses to national roads to which speed limits greater than 60 km/hr apply. This provision applies to all categories of development".

Retailing

TII acknowledges the support for town centre development and the application of the sequential approach to retail development outlined in Section 4.13 of the Draft Plan. In this regard, TII requests the inclusion of a new policy or objective in the Plan to provide for the explicit presumption against large out of town retail centres located adjacent or close to existing, new or planned national roads/motorways reflecting policy outlined in the Retail Planning Guidelines, 2012.

3. Transport Planning and National Road Schemes

TII makes reference to Policy ILU POL 6 in the Draft Plan, which outlines a Corridor and Route Selection Process to be applied to new transport infrastructure projects. The submission emphasises that all national road projects are required to be progressed in accordance with statutory processes and TII Publications, including the Project Management Guidelines and Project Appraisal Guidelines. TII has raised concerns that applying an additional undefined process to national road schemes may create risks for schemes provided for in the National Development Plan and create unintended consequences.

In this regard, TII would not support the additional requirements of Policy ILU POL 6 and would welcome clarification in the Draft Plan that Policy ILU POL 6 will not be applied to national road schemes in the interests of avoiding risk to proposed national road schemes, in the interests of clarity and in the interests of adherence to the provisions of official policy. TII remains of the view that, in all instances, national road improvement schemes should be developed complementary to safeguarding the strategic function of the national road network and proposals impacting on the national road network should be developed in consultation with and subject to the agreement of TII.



4. Integration of Land Use Planning and Transport

In reference to Section 8.4 – *Integration of Land Use Planning and Transportation* of the Draft Plan, TII would welcome the incorporation of reference to TII Publications Standard DN-GEO-03084 ‘*The Treatment of Transition Zones to Towns and Villages on National Roads*’ in the Development Plan in association with reference to DMURS, in the interests of providing clarification that such a standard will be applied, in the interests of road user safety, on national roads.

5. Ancillary Policy Provisions and Issues

Service Areas

In reference to Section 13.13.1 – *Service Stations* of the Draft Plan, TII would welcome the inclusion of a policy position reflecting the requirements outlined in Section 2.8 of the DoECLG ‘*Spatial Planning and National Roads Guidelines*’ (2012) relating to the provision of service areas and roadside facilities on national roads in the Draft Plan and the requirement for a forward planning approach to the provision of off-line motorway service areas at national road junctions.

Safeguarding National Road Drainage Regimes

In reference to Section 9.9 – *Storm Water Management* of the Draft Plan and having regard to the extensive national road network in Leitrim, TII would welcome the inclusion of a new objective in the Plan outlining that

“the capacity and efficiency of the national road network drainage regimes in County Leitrim will be safeguarded for national road drainage purposes”.

Grid Connection Routing and Renewable Energy Development

In reference to Section 12.6.1 – *Draft Leitrim County Renewable Energy Strategy* of the Draft Plan, TII would welcome the inclusion of an objective indicating that grid connection routing options should be developed to safeguard the strategic function of the national road network in accordance with Government policy by utilising available alternatives.

Traffic and Transport Assessment (TTA), Road Safety Audit (RSA) and TII Publications (Standards)

The submission notes that Section 13.16.4 – *Entrances and Sightlines* of the Draft Plan, includes a reference to the document, NRA TD 41-42 of the NRA Design Manual for Roads and Bridges (DMRB). The submission states that this document has been superseded and all relevant design standards for national roads are now included in TII Publications. Accordingly, the Council may consider a review of the text included in Section 13.16.1 that refers to the NRA to ensure updated referencing to TII and TII Publications is included in the Draft Plan.

Noise

Having regard to Section 9.12 – *Noise Pollution* of the Draft Plan, TII would welcome enhanced reference to Government policy whereby development proposals should identify and implement noise mitigation measures, where warranted, for development proposed in the vicinity of existing or proposed national roads. The costs of implementing mitigation measures shall be borne by the developer, as the Authority will not be responsible for the provision of additional noise mitigation.

Signage

TII notes Section 13.13.5 to 13.13.8 of the Draft Plan addresses signage. In this regard the submission requests that the Draft Plan is updated to incorporate reference to Section 3.8 of the DoECLG ‘*Spatial Planning and National Roads Guidelines*’ (2012), and TII’s ‘*Policy on the Provision of Tourist & Leisure Signage on National Roads*’ (March 2012).



6. Settlement Plans/Development Strategies

Aligning Development Objectives and Speed Limits on National Roads

TII note two proposed zoning/development proposals that have the potential to conflict with Government policy as they are proposed to adjoin the national road network outside locations where the reduced 50-60kmph urban speed limits apply. Accordingly, TII recommends a review of the settlement boundaries identified for the following:

- Manorhamilton – which includes the development Objective MHN 23 *'Relocate the Fire Station to the site identified with a 'Utility' land use zoning objective on the Sligo Road'* and the associated zoning designation. TII's records indicate that an 80kph speed limit applies to the N16 national primary road at this location.
- Glenfarne (Brockagh Lower) – which includes a proposed 'General' zoning on the N16 to the east of the settlement which is within a 100kmph speed limit zone according to TII's records, however, it is also noted that an alternative local road access may be available and should be clarified.

TII recommends a review of the proposed designations to ensure development objectives are appropriately aligned with national road speed limits in the interests of road user safety and the application of official policy.

Chief Executive's Response

The contents of the detailed submission are noted and the acknowledgement of the general alignment of the Draft Plan with official policy concerning development planning and development management and national roads are particularly welcome. It is noted that some of the items raised by TII have been previously addressed in the responses and recommendations issued arising from the submission from the OPR and therefore the relevant responses and recommendations provided should be read in conjunction with the responses and recommendations outlined hereunder.

1. Managing Exchequer Investment and Statutory Guidance

The Draft Plan has been prepared in accordance with national and regional policy and supports the principles of compact growth and sequential development. The design and layout of developments will be required to ensure permeability between communities and neighbourhoods with a strong emphasis on walking, cycling, and public transport.

The strategic importance of the national road network is acknowledged in the Draft Plan and underpinned by a number of policies to this effect to ensure that the function of the national road network is protected in line with national policy. For example, Policy TRAN POL 1 of the Draft Plan seeks to *"maintain and protect the safety, capacity and efficiency of national roads and associated junctions in accordance with the Spatial Planning and National Roads Guidelines for Planning Authorities (DECLG, 2012)"*. This policy objective will also protect the strategic transport function of the national roads in the county noting that there are no existing or proposed motorways traversing our county. The policy objectives contained in the Draft Plan are applicable in their totality and given the clear policy position outlined in Chapter 8 *Transport* it is not considered necessary to replicate that position elsewhere in the Plan.

As previously detailed in the response to recommendation 1 of the OPR submission, the preparation of the Joint LAP for Carrick-on-Shannon/Cortober will be informed by the preparation of a Local Transport Plan (LTP) for the LAP area. Policy provision is also provided in the Draft Plan in this regard with Objective MSSM OBJ 1 of the Draft Plan committing to the preparation of a LTP which will establish specific modal share targets for Carrick-on-Shannon to be incorporated into the forthcoming



LAP. The Council anticipates that TII will be a key stakeholder, along with the NTA and Roscommon County Council among others, in the preparation of the LTP and welcomes the comments from TII in support of its cooperation in this regard. There is no difficulty referencing the involvement of TII in a slight amendment to the relevant objective.

2. Section 28 Guidance: Spatial Planning and National Roads Guidelines

As previously addressed in the response to recommendation 8 (iii) of the OPR submission, the Planning Authority acknowledges the recommended omission of the reference to “*inappropriate*” to more closely align with national policy under Section 2.5 of the *Spatial Planning and National Roads Guidelines for Planning Authorities* (2012). Accordingly, there is no objection to this recommendation (see Recommendation No. 19).

Similarly, it is considered that **RUR SET POL 9** be amended to provide greater distinction between national roads and the R280 Regional Road, with the reference “*save for exceptional circumstances where alternative access cannot be achieved*” only applying to the R280. This was also covered in the Chief Executive's response to recommendation 8 (iv) of the OPR submission. (see Recommendation No. 20).

In relation to the comments in relation to Section 8.11.2.5, Policy TRAN POL 5 and Objective CARRICK OBJ 6 and the implications of this content with regard to Section 2.6 *Exceptional Circumstances* of the *Spatial Planning and National Roads Guidelines* 2012, this matter has already been considered in the response to Recommendation 8 (i) of the OPR submission. An amendment omitting the proposed exceptional circumstance was subsequently recommended (see Recommendation Nos. 17 and 18).

In relation to the provision of a cross reference in Section 3.17 *Rural Settlement Strategy* to Policy **TRAN POL 2**, it is considered that this is appropriate in the interests of clarity. TRAN POL 2 seeks

To protect the national road network from inappropriate new access points and the intensification of existing accesses onto or adjacent to national roads in accordance with the requirements of Section 2.5 of Spatial Planning and National Roads Guidelines for Planning Authorities (DECLG,2012) to maintain traffic capacity, minimize traffic hazard and protect and maximize public investment in such roads.

Moreover, having regard to the location and nature of developments facilitated by policies promoting rural enterprise and economic development, it is considered that an additional policy is warranted in Section 10.4 *Rural Economy* of the Plan to clarify for future applicants/developers, etc. in relation to relevant future development proposals with the potential to impact the national road network.

With regard to retail development and out of town retail centres, the Draft Plan has been prepared to reflect the provisions of the *Retail Planning Guidelines* (2012) and it is considered that the policy position has already been clearly outlined in Section 4.11 *Retail* of the Draft Plan.

3. Transport Planning and National Road Schemes

It is considered appropriate that Policy ILU POL 6 be amended to clarify that the outlined Corridor and Route Selection Process will not be applicable to national roads schemes which are required to be progressed in accordance with statutory processes and TII Publications, including the Project Management Guidelines and Project Appraisal Guidelines.

4. Integration of Land Use Planning and Transport

As per the recommendation of TII, it is considered appropriate and beneficial to include reference to TII Standard DN-GEO-03084 *The Treatment of Transition Zones to Towns and Villages on National*



Roads' in the Plan in association with reference to the Design Manual for Urban Roads and Streets (DMURS).

5. Ancillary Policy Provisions and Issues

The comments relating to 'service areas' are noted although as stated above there are no existing or proposed motorways traversing the county. It is considered reasonable to include specific content in Chapter 13 to address this.

With regard to surface drainage and grid connections, the comments raised are noted. It is however considered that the protection of the national road network is sufficiently addressed in the context of the policy position already set out in the Draft Plan. In respect of grid connections from renewable energy projects, it would be premature, in the absence of knowledge of all potential grid connection route options for any renewable energy project, to impose a constraint on the route options in the Plan which could hinder the delivery of renewable energy projects of a strategic nature.

In relation to references contained in the Draft Plan to the NRA and the Design Manual for Roads and Bridges (DMRB), these shall be updated to TII and TII Publications where relevant in Chapter 13 of the Plan.

With regard to noise and signage, it is considered appropriate to include additional text in the Plan to address these items.

6. Settlement Plans/Development Strategies

In relation to the provisions of Objective MHN 23 of the Manorhamilton Settlement Plan and the proposed relocation of the Manorhamilton fire station, regard should be had to the response provided in relation to recommendation 8 of the OPR submission. The proposed site which has been acquired by the Local Authority specifically for this purpose adjoins a transitional zone of the N16 primary road where the speed limit on the route is limited to 60kmph before dropping further to 50kmph east of the proposal site. As such, the provisions under Section 2.5 of the *Spatial Planning and National Roads Guidelines for Planning Authorities* (2012) apply, whereby a limited level of direct access may be provided.

In relation to the subject lands proposed to be zoned 'General' on the Glenfarne (Brockagh Lower) Settlement Plan map, it should be noted that whilst a significant proportion of the lands adjoin the 100kmph speed limit zone, there is an existing entrance from the lands onto the N16 developed upon foot of a previous permission on the lands. This entrance exists immediately adjacent to 50kmph speed limit zone but is within the 100 kmph speed limit zone. The Planning Authority would be keen to secure the completion of this incomplete and partially constructed housing development. Notwithstanding, it is noted that any intensification of the subject lands may give rise to additional safety risks to road users on the N16. As referenced in the TII submission, the subject lands are bounded to the east by the L2216 Local Road which may provide an alternative access solution to the lands without giving rise to any adverse impacts on the national road network or road user safety. However, it is considered that such an amendment could materially affect the previously permitted layout.

Accordingly, it is considered appropriate to amend Objective GE9 of the Glenfarne Settlement Plan to provide for a satisfactory access design solution for the subject lands, in agreement with TII and the Council, in facilitating any prospective development of these lands.



Chief Executive's Recommendation

Recommendation No. 34

Amend the second paragraph of Section 3.17.1 *Introduction of Section 3.17 Rural Settlement Strategy* as follows:

The Council will seek to ensure that rural development takes place in a manner that is compatible with the policy objectives of both the NPF and RSES, whilst ensuring to the maximum extent practicable the protection of environmental, biodiversity and heritage assets, the road network **including the provisions of Policy TRAN POL 2**, water quality and protected landscapes. This requires that the policy framework protects against over-spill and ribbon development from urban areas, does not facilitate urban generated rural housing and supports the National Strategic Outcomes of compact growth, sustainable mobility, transitioning to a low carbon and climate resilient society and sustainable management of our environmental resources.

Recommendation No. 35

Insert the following policy, RUR ECON POL 6 in Section 10.4 *Rural Economy* of the Plan:

RUR ECON POL 6 To avoid the creation of any additional access point from new development or the generation of increased traffic from existing accesses to national roads to which speed limits greater than 60 kmh apply.

Recommendation No. 36

Amend Policy ILU POL 6 as follows:

ILU POL 6 New transport infrastructure projects, including blueways and greenways, that are not already provided for by existing plans/programmes, which have been subject to environmental assessment, or are not already permitted, will be subject to feasibility assessment, considering need, environmental sensitivities as identified in the SEA Environmental Report, and objectives relating to sustainable mobility. Where feasibility is established, a Corridor and Route Selection Process will be undertaken, where appropriate, in two stages: Stage 1 – Route Corridor Identification, Evaluation and Selection; and Stage 2 – Route Identification, Evaluation and Selection. **This Corridor and Route Selection Process will not be applicable to national roads schemes which are required to be progressed in accordance with statutory processes and TII Publications, including the Project Management Guidelines and Project Appraisal Guidelines.**

Recommendation No. 37

Amend text relating to the last paragraph of Section 13.16 *Transport* as follows:

In respect of road design issues within towns and villages, the Council will have regard to the *Design Manual for Urban Roads and Streets* (DMURS) (DTTS and DECLG, 2013, updated 2019~~20~~) **and the TII publication, *The Treatment of Transition Zones to Towns and Villages on National Roads* (TII Publications DN-GEO-03084).**

Recommendation No. 38

Insert the following the following additional bullet point in Section 13.13.1 *Service Stations*:



- Proposals for new on-line or off-line motorway service facilities will be assessed in accordance with the guidance set out in the *Spatial Planning and National Roads Guidelines for Planning Authorities*, DECLG (2012).

Recommendation No. 39

Omit, where relevant, reference to 'NRA' to replace with 'TII' in Section 13.16.1 *Traffic and Transport Assessments*.

Recommendation No. 40

Amend the last paragraph of Section 13.16.4 *Entrances and Sightlines* as follows:

A relaxation of these sight distance requirements may be considered satisfactory in exceptional circumstances where it can be clearly demonstrated that no other suitable alternative proposal is available and where the proposal would be in accordance with the provisions as set out in the ~~NRA/TII 'Design Manual for Roads and Bridges – NRA TD 41-42/11'~~ or the ~~'Design Manual for Urban Roads and Street'~~ (DTTS and DECLG, 2013, updated 2019), as appropriate. **Publications.**

Recommendation No. 41

Insert the following policy, NP POL 4 in Section 9.12 *Noise Pollution*:

NP POL 4 Development proposals should identify and implement noise mitigation measures, where warranted, for development proposed in the vicinity of existing or proposed national roads. The costs of implementing mitigation measures shall be borne by the developer, as the Authority will not be responsible for the provision of additional noise mitigation.

Recommendation No. 42

Insert the following text as an additional paragraph to Section 13.13.5:

Signage on National Roads will be strictly controlled and will generally be only permitted in accordance with the provisions set out in Section 3.8 of the *Spatial Planning and National Roads Guidelines* (2012) and the *TII Policy on the Provision of Tourism and Leisure Signage on National Roads* (2011).

Recommendation No. 43

Amend Objective GE9 of the Glenfarne Settlement Plan (Volume II – Settlement Plans) as follows:

GE 9 Seek the satisfactory resolution of the unfinished housing development at Brockagh Lower with the provision of a satisfactory access design solution for the subject lands, in consultation with TII to facilitate any prospective development of the subject lands.



5.6 Department of Transport

Submission Ref. No. DLCDP-37

The submission notes that many of the policy objectives relating to sustainable movement align with the key areas being considered in the development of the new national sustainable mobility policy which is due to be published later this year.

The submission notes that the Draft Plan refers to the current sectoral policy documents – ‘*Smarter Travel, A Sustainable Transport Future 2009-2020*’ (Sections 4.11.1, 8.3, 8.4, 8.7, 8.11.5 TRAN OBJ 14, 12.6.8 EE POL 4, 12.7.2) and the ‘*National Cycle Policy Framework*’ (Sections 8.3, 13.16.7), and emphasises that the new national sustainable mobility policy will build upon and replace these policy documents. The Council may wish to change the wording of the draft written statement to reflect this.

In addition, policy context on pages 8, 150 and 275 of the Draft Plan (Volume I – Written Statement) should be updated to reflect the increased ambition in the *Climate Action Plan 2021*.

Since the adoption of the previous Plan, a number of new policy documents have been published and it is recommended that they should be reflected in Chapter 8 of the Draft Plan. Policy documents referred to include the *National Disability Inclusion Strategy*, the NTA’s *Local Link Rural Transport Programme Strategic Plan 2018 – 2022* and *DMURS Interim Advice Note – Covid 19 Pandemic Response*.

Chief Executive's Response

The comments raised are noted and support of the proposed policy framework contained in the Draft Plan is welcomed.

In relation to adding references to the various national policy documents, it should be noted that the *Draft Development Plans Guidelines for Planning Authorities (2021)* include 10 guiding principles for Quality in Plan-making. One of these principles outlines that there is no requirement to extensively reiterate national, regional and local policy, legislation or guidance documentation. Instead, the aim should be to focus and prioritise policies and objectives where possible. In preparing the Draft Plan, the Planning Authority shared this mind-set and as a result national or regional policy objectives have not been extensively reiterated.

Overall, it is considered that the principles of sustainable movement are appropriately dealt with in the content of the Draft Plan. Notwithstanding this, and as outlined in Recommendation No. 16 in response to the OPR’s Recommendation 7 regarding Sustainable Transport and Accessibility, additional content will be included in Chapter 8 of the Plan specifically addressing modal share and sustainable transport.

Additional references to the DMURS Interim Advice Note – Covid-19 Pandemic Response and the introduction of the Pilot Integrated Transport for Ireland (TFI) Local Link Public transport Project for Co. Leitrim will be inserted into the Plan.

Chief Executive's Recommendation

Recommendation No. 44

Insert the following text under the heading *Design Manual for Urban Roads and Streets, 2019* in Section 8.3 – *Legislative and Policy Context*:



In May 2020, in response to the Covid-19 pandemic and the need to accommodate additional space for pedestrians and cyclists and to optimise the space available on streets, an Interim Advice Note was issued by the Department of Transport, Tourism and Sport (DTTAS) to Local Authorities. The Interim Note provides guidance in order to assist in the implementation on a number of measures including:

- Widening of footpaths.
- Potential pedestrianisation of some streets.
- Potential one-way systems.
- Altering traffic signal times.
- Providing additional temporary facilities for cyclists.
- Provision of some external space where appropriate to support business activities.

Recommendation No. 45

Insert the following text under the heading *Local Link Rural Transport Programme Strategic Plan 2018 to 2022* in Section 8.3 – *Legislative and Policy Context*:

In June 2021, Phase 1 of the Pilot Integrated TFI Local Link Public Transport Project for Co. Leitrim commenced. The project consisted of the NTA and the Donegal Sligo Leitrim Transport Coordination Unit (TCU) working closely with the HSE to plan and develop a revised network of TFI Local Link services for Co. Leitrim. The services are designed to meet the needs of mainstream public transport users as well as the transport needs of passengers accessing (non-emergency) health care services.

5.7 Office of Public Works

Submission Ref. No. DLCDP-44

The OPW welcomes the acknowledgement of *‘The Planning System and Flood Risk Management’* Guidelines (2009) and the preparation of a Strategic Flood Risk Assessment (SFRA) and the inclusion of the flood risk management policies and objectives contained within the Draft Plan.

The submission provides commentary on the following items and highlights opportunities for the Draft Plan before it is finalised:

Flood Zones

Suggests that Section 1.4.4.4 – *Flood Zones* of the SFRA notes that the presence of flood protection structures are ignored when determining flood zones.

The inclusion of Land Use Zoning / Flood Intersections mapping is informative and helpful, and could be improved by indicating to which Flood Zone the intersections relate i.e. Flood Zone A or Flood Zone B.

Constrained Land Uses and Justification Tests

Submission notes the use of a *‘Constrained Land Uses’* designation in the Draft Plan which states:

“.. such flood risk extents correspond with undeveloped lands, an appropriate land use zoning objective which would not facilitate the development of classes of development vulnerable to the effects of flooding has been identified such as ‘Open Space’ or ‘Agriculture’”.

The OPW notes that lands that appear to be undeveloped in the following settlements have been zoned for vulnerable uses:

Settlement	Vulnerable Development
Dromod	Enterprise & Employment
Dromod	Tourism Related Development
Drumshanbo	Social and Community
Drumsna	Tourism Related Development (north of L3556)
Drumsna	Tourism Related Development (south of L3656)
Fenagh	General
Keshcarrigan	Tourism Related Development
Leitrim Village	Tourism Related Development

It is suggested that for these undeveloped lands, land use zoning objectives that would not facilitate the development of classes of development vulnerable to the effects of flooding should be applied.

The OPW suggest that a zoning objective of *‘Tourism Related Development’* may include water compatible uses and where land within Flood Zones A or B has been zoned for *‘Tourism Related Development’*, an objective to restrict development to water compatible usages could be added to the respective settlement plan i.e. for Dromod, Drumsna, Keshcarrigan, and Leitrim Village.



In reference to the Justification tests presented in Table 8 of the SFRA, the OPW state that it would be beneficial if each criterion of Part 2 of the Justification Test were addressed individually.

Climate Change

The submission recommends that policy FRM POL 11 (b) be amended to align with policy FRM POL 13 in requiring site specific flood risk assessments to take account of lands subject to the mid-range future scenario flood extents. Moreover, the OPW recommend that the SFRA refer to the Flood Risk Management – Climate Change Sectoral Adaptation Plan 2019 and the guidance on potential future scenarios contained therein.

Sustainable Urban Drainage Systems

It is recommended that the SFRA provide guidance on the likely applicability of different Sustainable Urban Drainage System (SuDS) techniques for managing surface water run-off at key development sites, and also that the SFRA identifies where integrated and area-based provision of SuDS and green infrastructure are appropriate in order to avoid reliance on individual site by site solutions.

Chief Executive's Response

The response is set out in the order of the items outlined above.

Flood Zones

The comments are noted. The Strategic Flood Risk Assessment (Main Report) notes under Table 3 (Measures for Individual Settlements designated as Areas for Further Assessment) that the Ministerial Guidelines require that the presence of flood protection structures to be ignored in determining flood zones. This has been adhered to in the consideration of land use zoning objectives for all urban centres in the Draft Plan.

Constrained Land Uses and Justification Tests

Dromod - Identified 'Enterprise and Employment' Zoned Lands

The land use zoning objective proposed for this site was subject to a Justification Test, the findings of which are detailed on Table 8 of the SFRA that accompanies the Draft Plan. There are existing Enterprise and Employment uses on these lands and they have been assessed as passing the Justification Test. This site was also considered in the context of the submission from the OPR.

Dromod - Identified 'Tourism Related Development' Zoned Lands

Provisions relating to flood risk management are provided within the Draft Plan's Volume I Written Statement. However, it is recommended that an additional Objective to the Settlement Plan for Dromod be inserted.

Drumshanbo – Identified 'Social and Community' Zoned Lands

Provisions relating to flood risk management are provided within the Plan's Volume I Written Statement. However, it is recommended to add an additional Objective to the Settlement Plan for Drumshanbo.

Drumsna – Identified 'Tourism Related Development' (north and south of L3556) Zoned Lands

Provisions relating to flood risk management are provided within the Plan's Volume I Written Statement. However, it is recommended to add an additional Objective to the Settlement Plan for Drumsna.



Fenagh – Identified 'General' Zoned Lands

Provisions relating to flood risk management are provided within the Plan's Volume I Written Statement. However, it is recommended to add an additional Objective to the Settlement Plan for Fenagh.

Keshcarrigan – Identified 'Tourism Related Development' Zoned Lands

Provisions relating to flood risk management are provided within the Plan's Volume I Written Statement. However, it is recommended to add an additional Objective to the Settlement Plan for Keshcarrigan.

Leitrim Village – Identified 'Tourism Related Development' Zoned Lands

Provisions relating to flood risk management are provided within the Plan's Volume I Written Statement. However, it is recommended to add an additional Objective to the Settlement Plan for Leitrim Village.

Climate Change

The comments are noted with no objection to amending policy FRM POL 11 (b) and specific reference in the SFRA to the Flood Risk Management – Climate Change Sectoral Adaptation Plan 2019.

Sustainable Urban Drainage Systems

The comments are noted. The Draft Plan already includes various provisions relating to SuDS and it is proposed to add these to the text in the SFRA on this issue. Moreover, it is considered that additional text identifying need to comply with the "Sustainable Urban Drainage Systems and Surface Water Guidance and Strategy" be included in the SFRA.

Chief Executive's Recommendation

Recommendation No. 46

Insert the following objective, DD 8, to the Dromod Settlement Plan in Volume II – *Settlement Plans* of the Draft Plan:

DD 8 Permissible uses for undeveloped lands within Flood Zones A or B that are zoned for 'Tourism Related Development' land use in this settlement shall be constrained to those "water compatible" and "less vulnerable" uses as appropriate to the particular Flood Zone (please refer to the flood risk management provisions in Volume I Written Statement and to the accompanying Strategic Flood Risk Assessment).

Recommendation No. 47

Insert the following objective, DSO 20, to the Drumshanbo Settlement Plan in Volume II – *Settlement Plans* of the Draft Plan with subsequent objectives to be renumbered appropriately:

DSO 20 Permissible uses for undeveloped lands within Flood Zones A or B that are zoned for 'Tourism Related Development' land use in this settlement shall be constrained to those "water compatible" and "less vulnerable" uses as appropriate to the particular Flood Zone (please refer to the flood risk management provisions in Volume I Written Statement and to the accompanying Strategic Flood Risk Assessment).

Recommendation No. 48

Insert the following objective, DA 8, to the Drumsna Settlement Plan in Volume II – *Settlement Plans* of the Draft Plan:



DA 8 Permissible uses for undeveloped lands within Flood Zones A or B that are zoned for 'Tourism Related Development' land use in this settlement shall be constrained to those "water compatible" and "less vulnerable" uses as appropriate to the particular Flood Zone (please refer to the flood risk management provisions in Volume I Written Statement and to the accompanying Strategic Flood Risk Assessment).

Recommendation No. 49

Insert the following objective, FH 5, to the Fenagh Settlement Plan in Volume II – *Settlement Plans* of the Draft Plan:

FH 5 Permissible uses for undeveloped lands within Flood Zones A or B identified for 'General Development' in this settlement shall be constrained to those "water compatible" and "less vulnerable" uses as appropriate to the particular Flood Zone (please refer to the flood risk management provisions in Volume I Written Statement and to the accompanying Strategic Flood Risk Assessment).

Recommendation No. 50

Insert the following objective, KN 6, to the Keshcarrigan Settlement Plan in Volume II – *Settlement Plans* of the Draft Plan:

KN 6 Permissible uses for undeveloped lands within Flood Zones A or B identified for 'General Development' in this settlement shall be constrained to those "water compatible" and "less vulnerable" uses as appropriate to the particular Flood Zone (please refer to the flood risk management provisions in Volume I Written Statement and to the accompanying Strategic Flood Risk Assessment).

Recommendation No. 51

Insert the following objective, LM 9, to the Leitrim Village Settlement Plan in Volume II – *Settlement Plans* of the Draft Plan:

LM 9 Permissible uses for undeveloped lands within Flood Zones A or B that are zoned for 'Tourism Related Development' land use in this settlement shall be constrained to those "water compatible" and "less vulnerable" uses as appropriate to the particular Flood Zone (please refer to the flood risk management provisions in Volume I Written Statement and to the accompanying Strategic Flood Risk Assessment).

Recommendation No. 52

Amend policy FRM POL 11 as follows:

- b) Applications for development within Flood Zones A or B, and on lands subject to the mid-range future scenario floods extents, as published by the Office of Public Works, shall be subject to site specific flood risk assessment. Such assessments shall consider climate change impacts and adaptation measures and shall provide details of structural and nonstructural flood risk management measures, to include, but not be limited to specifications of the following.....

Recommendation No. 53

Amend the text under the 'Provision' heading in reference to Chapter 9 *Infrastructure and Energy* of the SFRA (page 22) as follows:



To require that Strategic Flood Risk Assessments and site-specific Flood Risk Assessments shall provide information on the implications of climate change with regard to flood risk in relevant locations. The 2009 OPW Draft Guidance on Assessment of Potential Future Scenarios for Flood Risk Management (or any superseding document) and the Flood Risk Management – Climate Change Sectoral Adaptation Plan 2019, and the guidance on potential future scenarios contained therein, shall be consulted with to this effect.

Recommendation No. 54

Amend Section 3.5 of the SFRA as follows:

3.5 Sustainable Urban Drainage Systems and Surface Water Guidance and Strategy

New developments should be adequately serviced with surface water drainage infrastructure and promote the use of Sustainable Drainage Systems (SuDS). Planning applications for new developments will be required to provide details of surface water drainage and sustainable drainage systems proposals.

The Plan includes a variety of provisions relating to Storm Water Management:

Storm Water Management Policies

- SWM POL 1** To implement Sustainable Urban Drainage Systems (SuDS) in developments to encourage a more sustainable approach to storm water management.
- SWM POL 2** To resist the discharge of additional surface water to combined sewers and promote Sustainable Urban Drainage Systems (SuDs) and solutions to maximise the capacity of towns with combined drainage systems, where practicable.
- SWM POL 3** To require that new developments are adequately serviced with surface water drainage infrastructure which meets the requirements of the Water Framework Directive, associated River Basin Management Plans and CFRAM Management Plans.
- SWM POL 4** To limit the rate of surface water run off to pre development levels for all green-field developments.
- SWM POL 5** In the case of one-off rural dwellings, surface water shall generally be disposed of, in its entirety within the curtilage of the development site by way of suitably sized soak holes.

Storm Water Management Objectives

- SWM OBJ 1** To require the use of SuDS to minimise and limit the extent of hard surfacing and paving and require the use of sustainable drainage techniques where appropriate, for new development or for extensions to existing developments, in order to reduce the potential impact of existing and predicted flooding risks.
- SWM OBJ 2** To encourage the use of Green Roof technology particularly on apartment, commercial, leisure and educational buildings.



It is likely that some or all of the following SuDS techniques will be applicable to key development sites within the county, including to manage surface water run-off:

- Rainwater harvesting
- Green roofs
- Infiltration systems
- Proprietary treatment systems
- Filter strips
- Filter drains
- Swales
- Bioretention systems
- Trees
- Pervious pavements
- Attenuation storage tanks
- Detention basins
- Ponds and wetlands

The Plan provides for high-level, strategic land use zoning objectives at potential future development sites within settlements through the county. Each land use zoning objective allows for a range of possible uses and the Draft Plan allows for a range of scales, heights, densities configurations/layouts and designs. Further to these zoned sites, key development has the potential to occur anywhere else within the county under the Plan. The application of different SuDS techniques will be dependent on a combination of the site's characteristics and the particular development being considered.

Some sites in Co. Leitrim such as those for which guidance is provided for below will pose particular challenges for SuDS. The best practice manuals cited at the end of this sub-section should be considered in determining solutions at these and other development sites.

At sites with high groundwater levels:

- Infiltration techniques may be particularly challenging and shallow infiltration basins or permeable pavements, may be most appropriate.
- Storage and conveyance systems need to be kept above maximum groundwater levels and membranes of appropriate robustness should be used to line any tanks.
- Locating storage tanks or lined sub-base systems below the maximum likely groundwater level can cause result in flotation and structural risks

At sites that are steeply sloping:

- Effective utilisation of SuDS storage capacity should be considered, which can benefit from aligning with contours of roads and other structures, where these sites are terraced. Terraced car-parking areas can allow for storage of water through pervious pavements. Basins on terraces can provide open space. The runoff catchment on these sites can also be divided into smaller sub catchments.
- Velocities in swales and basins due to the steep slope can be managed by using check dams in swales or in storage layers, such as below permeable pavements.
- The possibility of infiltrating water resurfacing downslope or to increase pressure on downslope structures, such as walls, causing them to fail should be considered.

At sites that are very flat:

- On very flat sites, it is often not possible to construct piped drainage systems with sufficient falls to achieve minimum self-cleansing velocities. The solution can involve the use of shallow SuDS components such as swales, pervious pavements or high capacity linear drainage



channels, often dividing the site into small sub-catchments and providing local combined storage and conveyance components.

- A slight fall on any subgrade exposed to water is preferred in order to avoid ponding of water and reduction in strength in the soil due to waterlogging. If this is not possible then reduction in strength should be taken into account in the structural design of tanks or pervious pavements.
- Pumping should be a last resort and only allowable in situations where guaranteed maintenance of the pumps can be ensured.

At sites that include areas of floodplain:

- Notwithstanding that all storage volume should normally be provided within the development footprint, outside of the floodplain, SuDS on floodplains can be effective in managing routine rainfall/treatment for frequent events.
- SuDS should be selected and designed taking account of the likely high groundwater table and vulnerability to erosion during periods of high flows/water levels and SuDS should not reduce floodplain storage or conveyance.
- Conveyance routes should limit grading and the creation of surface features that could either reduce floodplain capacity or be washed out in a flood.
- Surface discharge from SuDS should be dispersed with point discharges minimised or eliminated.
- All SuDS within or crossing a floodplain should take full consideration of the likely influence of river water levels on the design performance. Combined probability assessments may be required.
- Siltation and subsequent clearance after a flood event has subsided should also be taken into account in the design.

SuDS are effective technologies, which aim to reduce flood risk, improve water quality and enhance biodiversity and amenity.

The systems should aim to mimic the natural drainage of the application site to minimise the effect of a development on flooding and pollution of existing waterways. SuDS include devices such as swales, permeable pavements, filter drains, storage ponds, constructed wetlands, soakways and green roofs. The integration of nature based solutions, such as amenity areas, ecological corridors and attenuation ponds, into public and private development initiatives, is applicable within the provisions of the Plan and should be encouraged.

In some exceptional cases, and at the discretion of the Council, where it is demonstrated that SuDS devices are not feasible, approval may be given to install underground attenuation tanks or enlarged pipes in conjunction with other devices to achieve the required water quality. Such alternative measures will only be considered as a last resort. Proposals for surface water attenuation systems should include maintenance proposals and procedures.

Urban developments, both within developments and within the public realm, should seek to minimise and limit the extent of hard surfacing and paving and require the use of sustainable drainage techniques for new development or for extensions to existing developments, in order to reduce the potential impact of existing and predicted flood risk. Development proposals should be accompanied by a comprehensive SuDS assessment that addresses run-off rate, run-off quality and its impact on the existing habitat and water quality.

For larger sites (i.e. multiple dwellings or commercial units) master planning should ensure that existing flow routes are maintained, through the use of green infrastructure. In addition, where



multiple individual proposals are being made SUDS should be integrated where appropriate and relevant.

All proposed development should consider the impact of surface water flood risks on drainage design e.g. in the form of a section within the flood risk assessment (for sites in Flood Zone A or B) or part of a surface water management plan.

Areas vulnerable to ponding are indicated on the OPW's PFRA Pluvial mapping. Particular attention should be given to development in low-lying areas which may act as natural ponds for collection of run-off. The drainage design should ensure no increase in flood risk to the site, or the downstream catchment. Where possible, and particularly in areas of new development, floor levels should be at an appropriate height above adjacent roads and hard standing areas to reduce the consequences of any localised flooding. Where this is not possible, an alternative design appropriate to the location may be prepared.

Proposals for development should consider the Construction Industry Research and Information Association (CIRIA) SuDS Manual 2015 and any future update of this guidance and Greater Dublin Strategic Drainage Study documents in designing SUDS solutions, including the New Development Policy, the Final Strategy Report, the Code of Practice and "Irish SuDS: guidance on applying the GSDS surface water drainage criteria".



5.8 Department of Housing, Local Government and Heritage (Development Applications Unit)

Submission Ref. No. DLCDP-131

The submission from the Department provides recommendations/observations in relation to a number of heritage-related themes as follows:

Archaeology

The National Monuments Service (NMS) unit of the Department welcomes the policies and objectives set out in Chapter 11 – *Heritage* of the Draft Plan in relation to the protection and promotion of our archaeological, architectural and built heritage. In reference to Section 11.21 – *Archaeological Heritage*, the Department recommends that definitive sections/policies on the protection of the county's underwater cultural heritage should be addressed, including provisions for the adequate assessment and protection of both known and potential underwater archaeology. This should include an overarching objective for the protection of all wrecks protected under the National Monuments Acts or otherwise included in the Wreck Inventory of Ireland Database (WIID) as maintained by the National Monuments Service of the Department of Housing, Local Government and Heritage.

The submission provides recommended amended text in respect of Sections 11.21 and 11.22 which provide written context for underwater archaeology heritage, as well as suggested amendments to Policy ARCH POL 1 and Objectives ARCH OBJ 2-5 to address underwater archaeological heritage.

The Department also recommends the inclusion of suggested additional policies in relation to underwater archaeological heritage, supporting community initiatives regarding the preservation, presentation, publication of and access to archaeological heritage and underwater cultural heritage, and to support the research and the production of a Conservation Management Plan for the Black Pig's Dyke in Co. Leitrim.

In respect of Chapter 12 – *Climate Action and Renewable Energy* of the Draft Plan, the Department references the implementation of the *Climate Change Sectoral Adaptation Plan for Built and Archaeological Heritage* and provides a number of suggested policies/objectives recommended for inclusion in the Plan, as well as enhanced references in relation to climate change and archaeology, architectural and cultural heritage.

Nature Conservation

The submission also provides the following observations in relation to meeting the objectives and obligations that may arise in relation to European sites, other nature conservation sites, biodiversity and environmental protection in general:

1. Recommends that Section 11.3 - *Natural Heritage and Biodiversity* be separated into an individual section of the Plan or alternatively Section 11 of the CDP (Heritage) is relabelled '*Heritage and Biodiversity*' to highlight and reflect the importance of biodiversity in Leitrim as well as its role in supporting our national resilience to climate change and the provision of ecosystem services.
2. In reference to Section 11.12 – *Invasive Species*, the Department recommends that consideration is given to rewording Policy IS POL 1 to incorporate reference to the EU Regulation on Invasive Species.
3. In relation to Section 13.15 – *Natural and Built Heritage*, where full Appropriate Assessment is required, the Department recommends that the draft wording is further strengthened to ensure



that appropriate skillset is used in this task e.g. the assessment shall be based on best scientific knowledge and undertaken by a person with appropriate ecological expertise and qualifications.

4. With regard to Section 13.17.4 – *Sustainable Urban Drainage Systems (SuDS)*, the Department welcomes the dedicated objective to adopt / incorporate best practice SuDS standards or equivalent for all new development consents within the county, irrespective of their location.
5. In relation to Section 13.9 – *General Development Standards* and Section 9.8 – *Flood Risk Management*, the Department recommends that a dedicated policy is adopted to ensure that slowing the flow of water from, through or off development sites in upper hydrological catchments is central to any new design brief.
6. With regard to Section 8.9 – *Blueways and Greenways*, the Plan should explicitly acknowledge that such routes constitute a class of road development, with significant risks to biodiversity and nature conservation with the development of such trails in environmentally sensitive areas. The submission also states that project splitting has been a feature of greenway development in the county and the Plan should endeavour to ensure that sufficient high level plans are in place to coordinate and assess the in-combination and cumulative impacts of local projects that contribute to the development of wider cycle and walking infrastructure.
7. In respect of Section 13.20.1 – *Wind Energy*, the Department recommends that impacts to peat and risks arising from potential peat slippage are specifically highlighted in this section.
8. In relation to Section 13.18.1 – *Agricultural Buildings and Structures*, the Department recommends that environmental constraints such as proximity to designated and proposed nature conservation sites is flagged and the need for screening for appropriate assessment where necessary is highlighted in this section.

Chief Executive's Response

The comments provided in the submission are welcomed, as are the suggested recommendations in respect of archaeological heritage, and in particular underwater archaeological heritage. Similarly, the comments and suggested recommendations to the written content and policies/observations associated with nature conservation and biodiversity are also appreciated.

Regarding the recommendation for a dedicated policy on slowing the flow of water from, through or off development sites, Section 13.17.4 *Sustainable Urban Drainage Systems (SuDS)* of the Development Management Standards of the Draft Plan requires development proposals to be accompanied by a comprehensive SuDS assessment that addresses run-off rate, run-off quality and its impact on the existing habitat and water quality. Accordingly, it is considered that there is sufficient policy coverage contained within the Draft Plan in this regard.

In relation to the submission item regarding Section 8.9 *Blueways and Greenways*, the assessment of any development will be subject to considerations such as potential impacts on designated sites of ecological importance or other environmental considerations with the Draft Plan containing a number of policies and objectives which provide sufficient policy provisions in this regard.

Similarly, in relation to the comments provided by the Department in relation to Section 13.18.1 *Agricultural Buildings and Structures*, it is considered that sufficient policy considerations are provided for in the Draft Plan in this regard.



Chief Executive's Recommendation

Recommendation No. 55

Amend the title of Chapter 11 of Volume I – Written Statement to *Heritage & Biodiversity*.

Recommendation No. 56

Amend the last paragraph of Section 11.21 *Archaeological Heritage* as follows:

The archaeological heritage of Co. Leitrim includes, according to the *European Convention for the Protection of Archaeological Heritage, 1992 (Valetta Convention)* structures, constructions, groups of buildings, developed sites, all recorded monuments as well as their contexts, and moveable objects; situated both on land and under water. This means that the archaeological heritage is not confined to the archaeological sites within the Record of Monuments and Places, but also includes any archaeological site that may not have been recorded yet, as well as archaeology beneath the ground surface, **underwater archaeological heritage**, as well as the context of any site. Co. Leitrim has a **rich underwater archaeological heritage that includes protected wrecks that lie off the coast of the county, log boats and artefacts that have been recorded from the county's lakes and inland waterways, crannóga, fish-traps, riverine and lacustrine built heritage and many other forms of underwater archaeological heritage**. One underwater heritage order in the county (UHO 1/90), which refers to Lough Donogher, located to the north east of Cloone.

Recommendation No. 57

Amend the first paragraph of Section 11.22 *Archaeological Assessment* as follows:

The Council will protect all such sites and monuments and their settings from inappropriate development. All planning applications likely to interfere with such a recorded site, **protected wreck or underwater archaeological heritage site**, monument or zone of archaeological interest will be referred to the Development Applications Unit of the Department of Housing, Local Government and Heritage, An Taisce and the Heritage Council. Regard will be given to the advice and recommendations of these bodies in respect of whether planning permission should be granted and the nature of conditions to be attached to any grant of planning permission.

Recommendation No. 58

Insert the following text as a second paragraph to Section 11.22 *Archaeological Assessment*:

All aspects of archaeological heritage and underwater cultural heritage, in all environments, shall be considered in the development process, including impacts on unidentified elements of the archaeological and underwater cultural heritage. Areas that have developed around watercourses, including rivers and lakes may contain known and/or previously unknown underwater archaeological sites, structures, features or artefacts, and this should be considered when reviewing the existing Development Plan and developing policies for the new plan. Likewise, reclaimed areas may also contain previously unknown, buried archaeology that could be revealed during development impacts. Any plan should include this in its policy and objectives section. Sites such as slipways, historic quays, quay furniture, fixtures and fittings, fish traps, harbours with associated marine infrastructure, including causeways, as well as specific sites such as shipwrecks, log boats, etc., singular sites such as rock cut platforms and steps, and of course artefactual material associated with sites or as individual depositions in underwater environments, etc. can all be retained and preserved in intertidal/foreshore and underwater contexts or on land previously covered by water (e.g. reclaimed areas).

Recommendation No. 59

Insert the following additional polices after Section 11.23 *Industrial Archaeology and Canals*:



ARCH POL 4 To protect, preserve and promote the archaeological value of underwater archaeological sites and objects in rivers, lakes, intertidal and subtidal environments. In assessing proposals for development, the Council will take account of the archaeological potential of rivers, lakes, intertidal and sub-tidal environments. Where flood relief schemes are being undertaken, the Council will have regard to the 'Archaeological Guidelines for Flood Relief Schemes' (DHLGH and OPW 2021).

ARCH POL 5 To support community initiatives and projects regarding preservation, presentation, publication of and access to archaeological heritage and underwater cultural heritage, provided such are compatible with appropriate conservation policies and standards, having regard to the guidance and advice of the Department of Housing, Local Government and Heritage.

Recommendation No. 60

Insert the following additional objective after Section 11.23 *Industrial Archaeology and Canals*:

ARCH OBJ 6 To support research and the production of a Conservation Management Plan for the Black Pig's Dyke in Co. Leitrim.

Recommendation No. 61

Amend policy ARCH POL 1 as follows:

ARCH POL 1 To secure the preservation (i.e. preservation in-situ or in particular circumstances where the Council is satisfied that this is not possible, preservation by record as a minimum) of all archaeological remains and sites of importance such as National Monuments, Recorded Monuments, **protected wrecks and underwater archaeological heritage**, to include their setting and context.

Recommendation No. 62

Amend objective ARCH OBJ 2 as follows:

ARCH OBJ 2 To ensure that any development (above or below ground **or underwater**), within the vicinity of a site of archaeological interest **or protected wreck or area of underwater archaeological heritage** shall not be detrimental to the archaeological remains, character of the site or its setting.

Recommendation No. 63

Amend objective ARCH OBJ 3 as follows:

ARCH OBJ 3 To require, where appropriate, that an archaeological assessment **or underwater archaeological impact assessment** be carried out by a suitably qualified person prior to the commencement of any activity that may impact upon archaeological heritage, **including underwater archaeological heritage**.

Recommendation No. 64

Amend objective ARCH OBJ 4 as follows:

ARCH OBJ 4 To protect the zones of archaeological potential, as identified in the Record of Monuments and Places, **protected recks and underwater archaeological heritage**.



Recommendation No. 65

Amend objective ARCH OBJ 5 as follows:

ARCH OBJ 5 To protect archaeological sites, **protected wrecks and underwater archaeological heritage** discovered since the publication of the Record of Monuments and Places, which are recorded in the Sites and Monuments Record.

Recommendation No. 66

Insert the following additional policy:

BH POL 8 To promote awareness and the appropriate adaptation of the county's architectural and archaeological heritage to deal with the effects of climate change.

Recommendation No. 67

IS POL 1 To require relevant development proposals to address the presence or absence of invasive alien species on proposed development sites and (if necessary) require applicants to prepare and submit an Invasive Species Management Plan where such a species exists to comply with the provisions of the European Communities (Birds and Natural Habitats) Regulations 2011-2015 **and the EU Regulation on Invasive Alien Species 1143/2014**.

Recommendation No. 68

Amend the fourth paragraph of Section 13.15.1 *Natural Heritage* as follows:

Where full Appropriate Assessment is required, the assessment shall be based on best scientific knowledge **and undertaken** by a person with **appropriate** ecological expertise **and qualifications**. It shall address the potential impacts of the plan or project on the conservation objectives of any Natura 2000 site. The impacts assessed must include the indirect and cumulative impacts of approving the plan or project, considered with any current or proposed activities, developments or policies impacting on the site. The potential impacts of policies outside Natura 2000 sites but potentially impacting upon them (known as 'ex situ' impacts) must also be included in the assessment. (Refer to: *Appropriate Assessment of Plans and projects in Ireland, Guidance for Planning Authorities*, DoEHLG (2009)).

Recommendation No. 69

Insert the following additional bullet point in the fourth paragraph of Section 13.20.1 *Wind Energy*:

- **Impact on peat stability and robust geotechnical assessment of potential for peat slippage**



5.9 Department of the Environment, Climate and Communications

Submission Ref. No. DLCDP-141

In prefacing its submission, the Department notes that the Draft Plan refers to the Department of Communications, Climate Action and Environment at points and requests amendments to reflect the current department title. The submission provides observations and recommendations under the following themes:

Climate Action

The Department welcomes the manner in which Climate Action is addressed in the Draft Plan and, particularly, how Chapter 12 of the Draft Plan contains specific policies and objectives relating to adaptation and mitigation. The focus on Climate Action throughout the Draft Plan is commended and this Department would welcome the opportunity for direct bilateral engagement on the proposed implementation of the objectives set out in the Draft Plan. The Department notes that the revised Climate Action Plan 2021 has been published and request that the Draft Plan be updated to reflect same, including additional references to the specific actions and targets set out therein.

Energy Infrastructure

The Department notes and supports the inclusion of Section 9.15 – *Energy Networks Infrastructure – Electricity and Natural Gas*, with the preference for the final version of the Plan to retain the policies and objectives contained in this section of the Draft Plan.

Renewable Energy

The submission notes that the Draft Plan and the Draft Renewable Energy Strategy (RES) have not been updated to account for the increased national ambitions set out in the Climate Action Plan 2021 and would appreciate it if this could be examined when amending the Draft Plan.

The submission also notes that the capacity study undertaken in relation to potential wind energy development in the county is based on a series of factors, one of which included “*set-back distances from housing using the minimum separation distance of 500m from all sensitive receptors as identified in the 2006 Wind Energy Development Guidelines (WEDG) and the 2019 Draft WEDG...*” (page 287 of Draft Plan Volume I Written Statement). In this regard, the Council is requested to clarify where in the 2006 Wind Energy Guidelines there is a requirement at Plan level to use such separation distances as a limiting factor for the allocation of suitable sites.

The Council is also requested, therefore, to demonstrate how the above limiting factor complies with Section 4(3) of the ‘*Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change*’ (2017). The Department requests that the Council reconsider the onshore target of 83MW set against a theoretical wind capacity of 594MW, with a significant proportion of the proposed wind development coming from repowering (26MW) or extensions to existing developments (27MW).

In relation to solar energy, the submission notes that the Draft Plan does not provide for a solar target whilst acknowledging the solar target of 30MW in the Draft RES and considers that the Draft Plan would benefit from same including clarity on how it contributes to the national ambition.

District Heating

The Department notes and welcomes the inclusion of policies RH POL 2 and RH POL 3 in the Draft Plan and requests that the Council considers additions to these policies requiring that applications for new developments demonstrate that they have considered district heating systems / technologies in their



design and that they have the capacity to connect to such systems in the future if they cannot do so at present.

Circular Economy

The submission considers that greater emphasis should be placed on the transition to a Circular Economy and additional references to the principles of circularity and the transition from a linear to a circular model to keep resources in use as long as possible should be included in the final Plan. The submission notes that the policies and objectives contained in Section 9.10 – *Waste Management* of the Draft Plan are broadly in line with the principles of the Circular Economy Strategy. The submission also requests that the Council consult with the respective Regional Waste Management Planning Office regarding development of the final plan.

Communications

The Department recommends reference to Government approved policy documents, *'Harnessing Digital – the Digital Ireland Framework'* and National Strategic Objective 6 of the *'National Development Plan 2021-2023'* in Sections 9.16-9.18 of the Draft Plan. The submission also outlines further policy measures that may be considered by the Council including:

- An objective to create centralised telecoms unit to manage all issues relating to telecoms, access to Local Authority assets and Smart Initiatives.
- For National Broadband Plan and telecoms development, a commitment to efficiently process application for required permits and licences to the scaled needed to support the National Broadband Plan deployment, and a commitment to work with operators to streamline and simplify the process (in addition to Policy BR POL 1).
- For ducting and other assets owned by the State, a commitment to publish inventories of these assets and develop a streamlined process to allow for easy accessibility for access seekers.
- Regarding 5G /Small Cell deployment, a commitment to identify suitable urban and suburban locations owned by the State for Masts / Small Cells to support smart town initiatives / programmes.
- In regard to, Smart programmes, a commitment to replicate smart programmes / initiatives across all towns and villages across the county.

The submission from the Department also appends additional observations from Geological Survey Ireland (GSI) under the following headings:

Geo-heritage

The submission welcomes the inclusion of policies AGI POL 1, AGI POL 2 and WE POL 3 and the listing of the 32 County Geological Sites (CGS) in Appendix XI of the Draft Plan. The submission refers to an additional Upland Karst Area Overview report that has not been included within the listing and recommends its addition to the Plan.

Culture and Tourism

The submission cites the importance of geo-tourism in neighbouring counties, most notably in the form of the Cuilcagh Lakelands UNESCO Global Geopark in Fermanagh and Cavan. The GSI encourages the Council to use the geological audit information to make it easily available to the public and encourage geology to be a significant part of any tourism initiative that may be introduced.

Dimension Stone/Stone Built Ireland

GSI refers to the *'Stone Built Ireland'* project which aims to document building and decorative stone in Ireland to inform government agencies, building owners and conservationists of the sources for suitable replacement stone in restoration work and to develop a greater awareness among the general



public. The submission considers that this project would be of benefit policies in Sections 11.18 - *Record of Protected Structures*, 11.20 - *Architectural Conservation Areas* and 13.15.2 - *Architectural Heritage – Protected Structures* in the Draft Plan.

Groundwater

The submission welcomes the use of GSI mapping and data in respect of Figures 4.10, 4.14 and 4.15 and requests that this data is attributed to GSI in the Plan. In reference to Section 9.7 – *Wastewater Treatment and Disposal*, the GSI note the option of direct discharge from domestic wastewater system to surface water raises concerns in relation to potential adverse environmental impacts on surface water systems.

Other Datasets

The submission has referenced the following datasets which may be of benefit to the Plan and associated SEA:

- bedrock and subsoil geological mapping
- Landslide Database and Landscape Susceptibility Viewer
- Geothermal Suitability Mapping
- Geochemistry datasets
- Geophysical datasets
- Historic mines datasets
- INFOMAR – national marine mapping programme
- Physiograph Units dataset

Natural Resources (Minerals/Aggregates)

GSI proposes an amendment to Policy AGG RES POL 7 to include that development for aggregates/mineral extraction, processing and associated processes does not have a significant negative impact on “*County Geological Sites and/or sites of geological importance*”. Moreover, the GSI provides suggested wording for planning conditions in respect of quarry development applications.

Chief Executive's Response:

The comments from the Department in support of the approach taken with regard to climate action, energy infrastructure, renewable energy, district heating and communications are particularly welcomed, as are those from the GSI in relation to geological themes associated with the Draft Plan and suggested amendments and content inclusions.

The following provides responses to the items raised in this submission.

Climate Action

The comments on the approach provided in relation to Climate Action in the Draft Plan are welcomed. It is acknowledged that the Climate Action Plan 2021 was published (November 2021) following the drafting of Chapter 12 and therefore references to it and the targets contained therein are absent. The policy context of the chapter will be updated to provide for the Climate Action Plan 2021 and reference to its renewable energy targets shall also be updated where relevant. Other references to the Climate Action Plan contained elsewhere in the Plan shall be updated to reflect the 2021 iteration e.g. Forestry Section.

Energy Infrastructure

The comments of the Department in support of the content of Section 9.15 *Energy Networks Infrastructure – Electricity and Natural Gas* of the Draft Plan are noted and welcomed.



Renewable Energy

The comments from the Department in relation to the renewable energy development provisions contained with the Draft Plan are noted and welcomed. Many of the items raised have been addressed in the response and associated recommendations provided in reply to Recommendation 10 of the OPR submission above (Section 3.2.7) and therefore should be read in conjunction with this response.

As referenced in the response to Climate Action, the Draft Plan, and Draft RES, will be updated to take account of the Climate Action Plan 2021 and its renewable energy targets, including the new target of 80% RES-E by 2030.

In relation to the comments raised regarding identified renewable energy targets, at this stage in the RES development, there is no scope to undertake a fundamental review of Leitrim's proposed RE targets having regard to the previous commissioning of a landscape and visual capacity study for the development of wind farms and the time constraints involved with this study (see response to OPR provided in Section 3.2.7). Notwithstanding, it is noted that Action 102 of the Climate Action Plan 2021 includes an objective to develop a new spatial policy for large scale wind and solar development, in support of the 80% RES-E target, and that this will be implemented through a regional planning initiative. When implemented, this will give counties like Leitrim the platform to review and if necessary, revise upward the renewable electricity targets from those contained in the Draft Plan.

In relation to the items raised in relation to wind energy capacity and targets, please refer to the response to the OPR comments (Section 3.2.7), which covers the same issue.

In relation to solar energy, the Climate Action Plan 2021 envisages up to 1.5 GW of solar energy being in place by 2030. In devising the target for Co. Leitrim, as provided for in the Draft RES, the following elements were taken into account:

- Overall national solar energy target.
- Leitrim's scale and geography – including its spatial pattern of small landholdings and undulating topography.
- Level of planning activity to date for solar projects in Co. Leitrim which is none.
- Climate conditions- available solar energy resource and levels of cloud cover.
- The pattern of successful solar projects emerging from RESS auctions – noting an increasing tendency toward large scale projects in the southeast, south and east of the country.

These factors resulted in a capacity target of 30MW. This represents 2% of the national target, which is considered reasonable given the factors outlines above.

District Heating

The Planning Authority welcomes the comments of the Department in support of policies RH POL 2 and RH POL 3 in the Draft Plan. In relation to the request for new developments to demonstrate that they have considered district heating systems/technologies in their design, it is considered that this is an overly prescriptive approach to facilitating such developments and could be more appropriately addressed through amendments to Building Control Regulations which are beyond the scope of the Development Plan.

Circular Economy

In relation to the comments of the Department on the '*Circular Economy*', additional text will be provided in Section 9.10 *Waste Management* of the Draft Plan providing greater emphasis on the transition towards a circular economy and referencing the *Whole-of-Government Circular Economy Strategy* launched in December 2021.



Communications

It should be further noted that the *Development Plans Guidelines for Planning Authorities (2022)* include 10 guiding principles for 'Quality' in Plan-making. One of these principles outlines that there is no requirement to extensively reiterate national, regional and local policy, legislation or guidance documentation. In this regard, it is considered that further reference in the Plan to the referenced telecommunications policy documents is unnecessary.

Moreover, it is considered that sufficient policy coverage is afforded in the Draft Plan to the development of telecommunications infrastructure.

Comments from Geological Survey Ireland (GSI)

The Planning Authority notes the extensive comments of the GSI and welcomes support for the policy objectives of the Plan relating to County Geological Sites and their protection. It is considered that the identification of such sites within the Plan and associated policy objectives collectively facilitate and promote early consultation regarding potential issues relevant to a site of any proposed development.

The list of County Geological Sites provided in Appendix XI of the Draft Plan shall be updated to include the additional site referenced in the submission.

The comments in relation to culture and tourism are welcomed and it is considered appropriate to include an additional policy to promote and facilitate the development of geo-tourism in Co. Leitrim.

The mapping displayed in Figures 4.10, 4.14 and 4.15 within the Draft SEA Environmental Report shall be updated and attributed to GSI.

The Planning Authority notes the comments from GSI in relation to Section 9.7 *Wastewater Treatment and Disposal* and the concerns expressed regarding the potential for adverse environmental impacts arising from direct discharge from domestic waste water systems to surface water. The reference to the exploration of direct discharge means is in response to the unique geological and soil conditions prevalent in Co. Leitrim which undermine the practical application of conventional private wastewater treatment systems disposing to ground. Notwithstanding, the Draft Plan reiterates the need for compliance with the EPA *Code of Practice for Domestic Waste Water Treatment Systems (Population Equivalent ≤ 10) (June 2021)* and to meet the requirements of the Water Framework Directive (WFD) and associated River Basin Management Plans (RBMP) and therefore any measures regarding direct discharge to surface waters will also need to comply with such requirements.

In relation to draft policy AGG RES POL 7, the Planning Authority has no objection to the proposed amendment.

The extensive catalogue of GSI mapping and data is also acknowledged.

Chief Executive's Recommendation

Recommendation No. 70

Replace references in the Draft Plan to the Department of Communications, Climate Action and Environment with Department of the Environment, Climate and Communications where relevant.

Recommendation No. 71

Replace references to the Climate Action Plan 2019 in the Draft Plan, including Section 2.3 of the *County Leitrim Renewable Energy Strategy*, with its 2021 iteration throughout.



Recommendation No. 72

Amend the section contained in Section 12.2.3 *National, Regional and Local Legislative and Policy Context* under the heading *Climate Action Plan – To Tackle Climate Breakdown (2019)* as follows:

Climate Action Plan – ~~To Tackle Climate Breakdown~~ Securing Our Future (201921)

The Climate Action Plan provides a statement of Government policies relevant to decarbonisation and adapting to a changing climate, with ~~183~~493 no. specific actions over ~~12~~ a number of sectors and charts an ambitious course towards decarbonisation **halving our GHG emissions by 2030 and reaching net zero by 2050**. Figure 12.1 provides an infographic of some of the actions contained in the Plan. The Plan also reflects Ireland's commitment to achieving the 17 no. Sustainable Development Goals (SDGs) agreed by the United Nations in 2015. The SDGs address the environmental, economic, and social challenges that the world needs to tackle by 2030 to ensure a sustainable future.

It reflects the central priority that climate change will have in Ireland's political and administrative systems into the future, setting out governance arrangements including the carbon-proofing of government policies, the establishment of carbon budgets, the strengthening of the Climate Change Advisory Council and providing greater accountability to the Oireachtas.

~~Under the Climate Action Plan the following actions are recognised as being specific to Local Authorities:~~

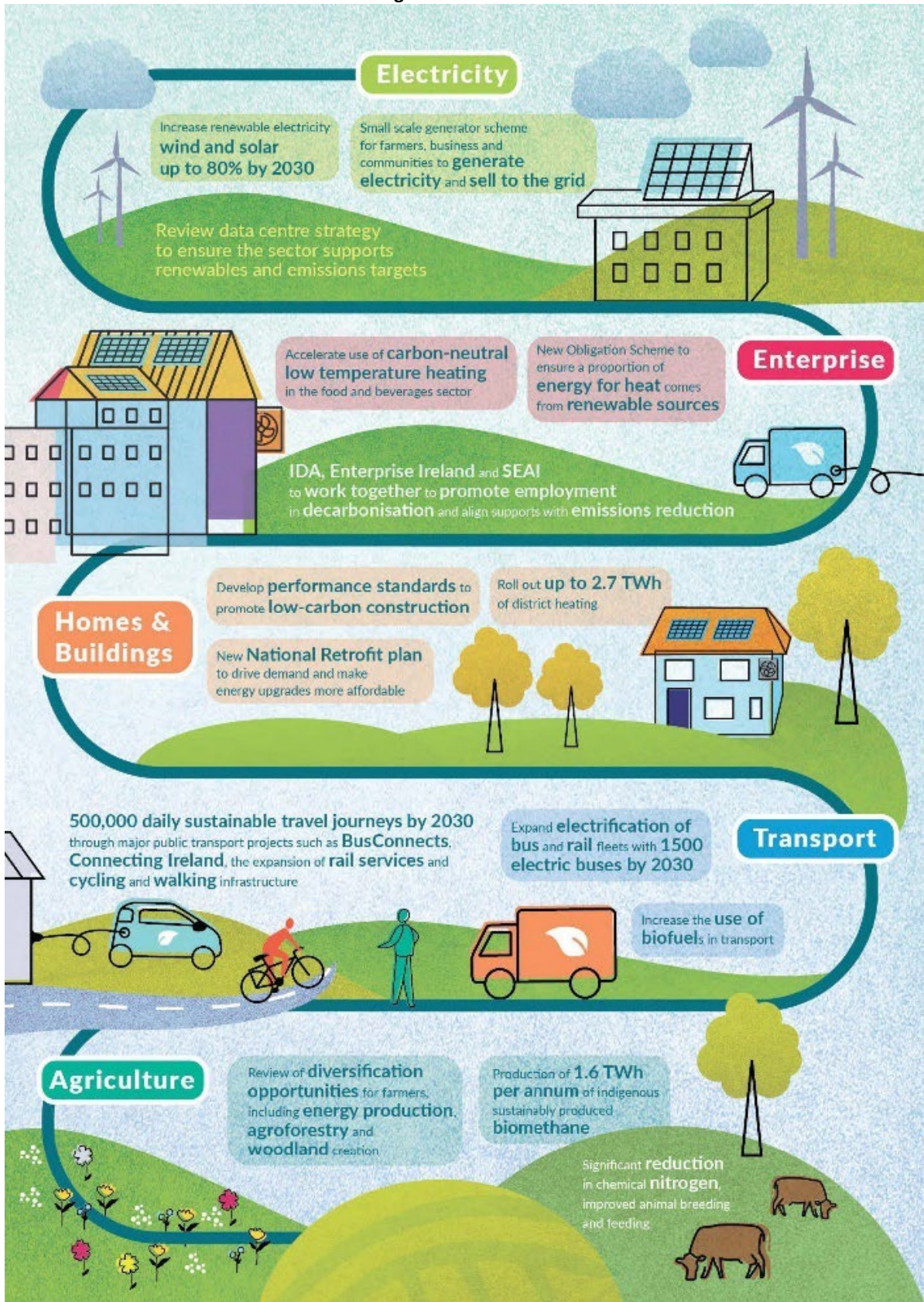
~~**Action 64** – Introduce minimum Building Energy Rating (BER) standards in the Local Authority social housing stock as part of retrofit works being carried out on older stock or refurbishment of vacant dwellings.~~

~~**Action 65** – Develop and establish a climate action toolkit and audit framework for Local Authority development planning to drive the adoption of stronger climate action policies in relation to the patterns and forms of future development.~~

~~**Action 66** – Roadmap to develop supply chain to support the phase out of fossil fuel boilers in new dwellings.~~

~~In addition,~~ The Climate Action Plan contains a series of actions where Local Authorities are identified as key stakeholders in their respective delivery. This includes Action ~~165~~ 80 which requires each Local Authority to identify and develop plans for one "Decarbonising Zone" within their functional area in collaboration with the Department of Housing, Local Government and Heritage (DHLGH) and the Sustainable Energy Authority of Ireland (SEAI). In respect of this action, Leitrim County Council has identified Carrick-on-Shannon as its designated 'Decarbonising Zone' (DZ) with a series of implementation plans for developing the Carrick-on-Shannon DZ to be included in the Leitrim County Council Climate Action Plan, as required by the Climate Action and Low Carbon Development (Amendment) Bill (2021).

Figure 12.1: Climate



Recommendation No. 73

To insert the following text as a further paragraph in Section 9.10 *Waste Management*:

This accords with the transition to a more circular economy and bio economy, as espoused in national policy in the form of the *Whole-of-Government Circular Economy Strategy* launched in December 2021, where the value of bio- based products, materials and resources is maintained in the economy for as long as possible, and the generation of waste is minimised. This Draft Plan supports the move to a more circular economy as this will save resources, increase resource efficiency, and help to reduce carbon emissions. The successful implementation of circular economy principles will help to reduce the volume of waste that the county produces.

Recommendation No. 74

To insert the following additional County Geological Site (CGS) into the List of County Geological Sites provided in Appendix XI of the Plan:

Theme Site No.	Site Name	IGH Theme - Primary	Principal Characteristics	Summary Description
IGH1 & IGH7	Upland Karst Area (overview)	IGH1 Karst; IGH 7 Quaternary	Upland Karst Landscape	The Glenade and Glencar Valleys are deep and wide glacial valleys, while the uplands flanking the valleys are some of the best areas in Ireland to see upland karst features, including potholes, shafts, caves, enclosed depressions and limestone pavement. The significance of the ‘upland karst landscape’ is heightened by the number and complexity of karst features in a relatively small area.

Recommendation No. 75

Amend policy AGG RES POL 7 as follows:

AGG RES POL 7

To ensure that development for aggregates/mineral extraction, processing and associated processes does not significantly impact in the following areas:

- a) Special Areas of Conservation and/or Special Protection Area
- b) Natural Heritage Areas and Proposed Natural Heritage Areas
- c) other areas of importance for the conservation of flora and fauna
- d) areas of significant archaeological potential



- e) in the vicinity of a recorded National Monument
- f) sensitive landscapes
- g) County Geological Sites and/or sites of geological importance



5.10 Fáilte Ireland

Submission Ref. No. DLCDP-143

It is noted at the outset of the submission that it comes at a time when “*Fáilte Ireland is emphasising the need for land-use plans to manage all land uses and economic drivers – of which tourism is but one, in a more holistic, strategic and spatial manner to maximise the efficient use of resources and the achievement of greater outcomes for society at large.*” The purpose of the submission is to seek to enhance the policy framework contained in the Draft Plan in order to enhance tourism in the county.

The following provides a summary of the points raised in the extensive submission from Fáilte Ireland.

1. Objective of Submission

The submission has been prepared having regard to the tourism profile of the county; the existing policy context in the Draft Plan; and an established template for sustainable tourism policies being used by Fáilte Ireland to guide Planning Authorities.

2. Commentary on the Draft Plan

Fáilte Ireland is generally supportive of the Draft Plan and again welcomes the opportunity to assist the County Council in the important area of policy preparation.

3. Proposals for the Draft Plan

Fáilte Ireland welcomes the inclusion of a dedicated tourism chapter with robust policies and objectives to support tourism development. In terms of additional considerations for the Draft Plan, Fáilte Ireland provide a number of suggested tourism-related text and policy inclusions in relation to the following:

- Inclusion of a policy/objective supporting the preparation and implementation of Regional Tourism Strategies in the Plan;
- New policy/objective supporting the provision of accessible tourism;
- New policy/objective supporting the preparation of Destination Experience Development Plans and other tourism masterplans;
- New policy/objective supporting investment in digital technology in tourism sector;
- New policy/objective supporting The Beara Breifne Way;
- Suggested sub-section for ‘Sustainable Tourism’.
- Suggested text/amendments in relation to policy context and draft policies and objectives contained within the Draft Plan in respect of Chapter 5 – *Tourism*, Chapter 8 – *Transport*, Chapter 12 – *Climate Action and Renewable Energy* and Chapter 13 – *Development Management Standards*.

Chief Executive's Response

The Draft Plan recognises the substantial tourism assets within the county and the significant opportunities that exist, with Chapter 5 dedicated to this theme and setting out a number of policies and objectives in support of its development in the county. Accordingly, the Planning Authority welcomes the comments from Fáilte Ireland in support of the policies and objectives in this regard. The Planning Authority has no objection to the inclusion of the suggested text and policy inclusions and amendments provided in the submission.



Chief Executive's Recommendation

Recommendation No. 76

Insert the following objective in Section 5.3 *General Tourism Development* of the Draft Plan:

TOUR OBJ 10 To support the preparation and implementation of Regional Tourism Plans and when complete, to support the continued collaboration with Fáilte Ireland and tourism stakeholders to ensure successful implementation and delivery of these Tourism Plans.

Recommendation No. 77

Insert the following policy in Section 5.3 *General Tourism Development* of the Draft Plan:

TOUR POL 10 To facilitate, where appropriate, proposals to improve access for all at existing tourism sites and facilities, and to require all new tourism related developments to ensure the development is accessible to everyone, regardless of their age, or ability.

Recommendation No. 78

Insert the following objective in Section 5.3 *General Tourism Development* of the Draft Plan:

TOUR OBJ 11 To support the preparation of Destination Experience Development Plans (DEDP) and other tourism masterplans both within the county and also those which crosses from the county into neighbouring counties in collaboration with Fáilte Ireland and other tourism stakeholders.

Recommendation No. 79

Insert the following objective in Section 5.3 *General Tourism Development* of the Draft Plan:

TOUR OBJ 12 To encourage and support investment in digital technology in the tourism sector, with a particular focus on sectors such as visitor attractions and activities with low digital presence and/or integration.

Recommendation No. 80

Amend the second paragraph of Section 5.1 as follows:

Three airports serve the majority of Leitrim - Ireland West Airport Knock (50 minutes distant), Dublin (2 hours) and Belfast (3 hours). The Shannon-Erne waterway runs from the north east of the county to the south west, with Carrick-on-Shannon the '*navigational capital*' along the waterway. This coupled with the spectacular mountains and valleys of the northwest ensure a remarkable landscape for tourists to explore. ~~In 2018, Fáilte Ireland recorded total visitors to the county at 151,000 generating an estimated €38.5 million to the local economy.~~ **Fáilte Ireland's figures indicate that in 2019, Leitrim welcomed 1% of the 9.7 million overseas tourists who came to Ireland, spending 1% of the €5.2bn overseas tourism expenditure in Ireland, with a further 310,000 domestic visitors to Leitrim and Cavan generating an estimated €53m in revenue.** However, the COVID-19 pandemic presents a very challenging time for tourism as people have been unwilling or not permitted to travel. The tourism industry has suffered greatly, with significantly reduced revenue generation, redundancies and a loss of confidence in the industry and in travel in general. The Leitrim Tourism Strategy, "*A Growth Strategy for Tourism in Leitrim, 2015-2021*" outlined a target of 296,000 tourists to the county in 2021. This target cannot be realised due to the unforeseen pandemic, but opportunities present



themselves and with the vast open space of Co. Leitrim and safety in the outdoors, the focus will be on promoting the strong tourism product around family, food and slow adventure tourism across our county. Initially the focus will be on domestic visitors but returning in the short term, to attracting foreign visitors back to our shores.

Recommendation No. 81

Amend the fourth paragraph of Section 5.1 as follows:

In April 2018, Fáilte Ireland unveiled 'Ireland's Hidden Heartlands' focussing on the River Shannon and the Béara Breifne Way. Ireland's Hidden Heartlands is a regional branded experience which encourages consumers to explore the green heartlands of Ireland's natural beauty, where activity and relaxation are centred around rural communities. 'Ireland's Hidden Heartlands' region includes the entire length of the River Shannon referred to in the Shannon Masterplan as well as the main sections of the Béara Breifne Way. The Wild Atlantic Way continues to be a key driver for tourism growth for north Leitrim extending from the coastline inland to include Manorhamilton and Dromahair. It is through cohesive development and marketing of a variety of activities within the county that will ensure longer stay vacations and increased revenue. This Plan supports the development of accessible facilities and information points at tourist destinations to support tourism development throughout the county whilst also ensuring the protection of the environment.

Recommendation No. 82

Insert the following text as Section 5.2.12 *Tourism Masterplan for the Béara Breifne Way*:

5.2.12 Tourism Masterplan for the Béara Breifne Way

The Tourism Masterplan for the Béara Breifne Way is based on the vision and aspirations of Fáilte Ireland and the regional destination brands, particularly Ireland's Hidden Heartlands. The primary aim of the Béara Breifne Way is to attract visitors 'off the beaten track', creating significant economic and social benefits to the rural communities, towns and villages along the route. The existing Béara Breifne Way stretches from Dursey Island in Co Cork to Blacklion in Co Cavan. It runs for over 700km and traverses the counties of Cork, Kerry, Limerick, Tipperary, Offaly, Galway, Roscommon, Sligo, Leitrim and Cavan. The Béara Breifne Way is made up of 12 existing National Waymarked Trails or long-distance walking routes, including the Leitrim Way, and sections of trail that link these. The Béara Breifne Way runs through the experience brand region of Ireland's Hidden Heartlands and is a signature visitor experience in this destination. The route also traverses the Wild Atlantic Way and Ireland's Ancient East destination brands.

Fáilte Ireland has procured consultants to conduct a detailed infrastructural and visitor experience review of the Béara Breifne Way to bring the trail up to best-in-class international standards. The review includes a full trail audit, trail design, development of an interpretation framework, orientation and wayfinding strategies and environmental assessments for the Béara Breifne Way. The project is scheduled for completion Q2 2022 with the findings to be implemented through a collaborative approach with all stakeholders over the lifetime of the Tourism Masterplan (2030).

Recommendation No. 83

Insert the following objective in Section 5.3 *General Tourism Development* of the Draft Plan:

TOUR OBJ 13 To support the future success and deliverability of The Béara Breifne Way and promote and identify the need for key facilities and services for visitors such as accommodation, signage, parking, and sustainable transport as identified in the 'Tourism Masterplan for the Béara Breifne Way' prepared by Fáilte Ireland.



Recommendation No. 84

Amend policy TOUR POL 3 as follows:

TOUR POL 3 To preserve and protect verified public rights of way which give access to seashore, mountain, lakeshore, riverbank, **canals** or other places of natural beauty or recreational utility.

Recommendation No. 85

Amend policy TOUR POL 4 as follows:

TOUR POL 4 To develop **opportunities for 'Slow Adventure Tourism' or 'Regenerative Tourism' clusters to be established within the county.**

Recommendation No. 86

Amend policy TOUR POL 6 as follows:

TOUR POL 6 To seek to **sustainably** manage any increase in visitor numbers in order to avoid significant effects including loss of habitat and disturbance, including ensuring that any new projects, such as blueways and greenways, are a suitable distance from ecological sensitivities, such as riparian zones.

Recommendation No. 87

Amend policy TOUR POL 7 as follows:

TOUR POL 7 Where relevant, the Council and those receiving consent for development shall seek to **sustainably** manage any increase in visitor numbers and/or any change in visitor behaviour in order to avoid significant effects to sensitive habitats, including loss of habitat and disturbance. Management measures may include ensuring that new projects and activities are a suitable distance from ecological sensitivities. Visitor/Habitat Management Plans will be required for proposed projects as relevant and appropriate.

Recommendation No. 88

Amend objective TOUR POL 6 as follows:

TOUR OBJ 6 To work with all relevant stakeholders to **promote and** support the implementation of the Shannon Tourism Masterplan, **the Tourism Masterplan for the Beara Breifne Way and findings of the technical trail audit for the Beara Breifne Way** and **promote and support the** 'Wild Atlantic Way' and 'Ireland's Hidden Heartlands'.

Recommendation No. 89

Amend objective ARTS OBJ 2 as follows:

ARTS OBJ 2 To support the development of Leitrim as a **'Foodie Destination'** of **food networks and trails, particularly those that can showcase the wealth of artisan food producers in the county** in conjunction with Fáilte Ireland and other relevant stakeholders.



Recommendation No. 90

Amend the second paragraph of Section 5.5 *Greenways, Cycling and Walking* as follows:

The development of Blueways and Greenways presents valuable opportunities for rural communities to attract more visitors. These values lie not only in the recreational opportunities that they offer but also in their potential to stimulate local businesses and regenerate local areas. Leitrim County Council is committed to the development of further Blueways and Greenways during the life of the next County Development Plan.

Recommendation No. 91

Amend policy ADV TOUR POL 3 as follows:

ADV TOUR POL 3 To maintain water quality and develop **shared** facilities at designated water bathing sites.

Recommendation No. 92

Insert the following objective in Section 5.3 *General Tourism Development* of the Draft Plan:

ADV TOUR POL 4 To support both the enhancement of existing and development of new access to water locations in the county for recreation purposes. The provision of shared facility centres for water-based activities in the county shall be supported by the Council.

Recommendation No. 93

Amend policy TOUR INF POL 4 as follows:

TOUR INF POL 4 To facilitate the sustainable development of a variety of quality tourist accommodation, ~~types,~~ including **hotels, guesthouses, hostels, B&Bs, holiday homes, glamping/camping/caravan and campervans** at suitable locations, throughout the county.

Recommendation No. 94

Amend objective TOUR INF OBJ 2 as follows:

TOUR INF OBJ 2 To facilitate the development of **various accommodation such as hostels, hotels, guesthouses, hostels, B&Bs, holiday homes, glamping/camping/caravan and campervans** along established walking/hiking routes and adjacent to existing tourism/recreation facilities, subject to satisfying normal planning criteria.

Recommendation No. 95

Amend the second paragraph of Section 8.9 *Blueways & Greenways* as follows:

Blueways are a network of multi-activity recreational trails, based on or alongside lakes, canals and rivers. They provide scenic routes into the heart of rural Co. Leitrim by walking, cycling, canoeing, kayaking or stand up boarding. Leitrim County Council in partnership with Waterways Ireland and **Fáilte Ireland**, have developed a valuable Blueway product over the past number of years between Battlebridge and Drumshanbo along the Leitrim Canal including the impressive floating boardwalk section at Acres Lake and onwards to connect to the Lough Allen Hotel & Lough Allen Centre at Currachuill, Drumshanbo. More recently, work has been completed on sections of the Ballinamore to



Ballyconnell Canal between Leitrim Village and Kilclare along the former towpath. Carrick-on-Shannon and Drumshanbo form part of the Shannon Blueway with Leitrim Village and Ballinamore forming part of the Shannon Erne Blueway. The Council is currently undertaking environmental feasibility studies of options to link Carrick-on-Shannon to Leitrim Village and Battlebridge by way of dedicated Blueway. This project is also included in the approved Shannon Master Plan within the Hidden Heartlands area.

Recommendation No. 96

Amend the second bullet point of Section 13.19.1 *Caravan, Glamping and Camping Developments* as follows:

- ~~Compliance with the Regulations for Caravan and Camping Parks (Bord Fáilte 2009)~~
- Any proposed caravan and/or camping site should be in compliance with the '*Fáilte Ireland Registration and Renewal of Registration Regulations for Short Term Tourism Accommodation Rental 2018*'.



5.11 National Transport Authority

Submission Ref. No. DLCDP-151

The National Transport Authority (NTA) provides a number of comments under the following:

1. Transport Policies

NTA welcomes the strategic aim of the Draft Plan which supports increased use of sustainable modes of transport. Reference is made to key national transport policy documents, *National Sustainable Mobility Policy* and the *National Investment Framework for Transport in Ireland (NIFTI)* which will guide transport investment in the years ahead to enable the NPF, support the Climate Action Plan, and promote positive social, environmental and economic outcomes throughout Ireland.

The NTA provides suggested amendments to draft policies (IL POL 3, IL POL 4 and IL POL 5) to align more with the aforementioned national policy.

2. Movement at Settlement Level – Local Transport Plans (LTP)

The NTA welcomes the commitment to prepare a Local Transport Plan for Carrick-on-Shannon/Cortober in conjunction with Roscommon County Council, following the methodology contained in the NTA/TII document 'Area Based Transport Assessment'. The NTA looks forward to working with the County Councils and TII in the preparation of the Plan.

3. Planning for Bus Service Provision

The NTA welcomes Policies PT POL 1 – 8 and Objectives PT OBJ 1 – 4 in relation to public transport provision and provides suggested additional policies and an objective aimed at encouraging more use of public transport throughout the county, both within settlements and along interurban regional and local roads between them, through the development management process.

4. Walking and Cycling

The NTA welcomes Policies WC POL 1 – 5 and Objectives WC OBJ 1 – 5 in relation to walking. It also welcomes Policies BG POL 1 – 5 and Objectives 1 – 12 and recommends the inclusion of additional policies/objectives which seek to require filtered permeability as part of any new developments and that retrospective options for the provision of filtered permeability in existing neighbourhoods should be pursued.

The NTA further recommends the inclusion of an additional objective in relation to the provision of cycling infrastructure in towns to encourage cycling as an everyday mode choice, rather than just as a leisure or tourism pursuit, with suggested wording to this effect provided.

5. Parking Standards

The NTA welcomes Policies CP POL 1 – 5 and Objectives CP OBJ 1 – 2 in relation to car parking and Policies BP POL 1 – 4 in relation to bicycle parking. It is suggested that the wording of Policy BP POL 1 could be amended in order to ensure that any new developments, not just those directly in the centre of towns, should include bicycle parking, with suggested wording to this effect provided.

Also recommended is an additional objective in relation to long-stay bicycle parking.

6. Development Plan Indicators

The NTA welcomes the significant level of discourse with regard to mode share and the inclusion of the data provided by the NTA. The Plan includes data on mode share for Carrick-on-Shannon, as well as mode share for the County and trip distribution patterns for the county. The NTA welcomes objective MSSM OBJ 2 and looks forward to working with the Council on the Local Transport Plan for



Carrick-on-Shannon/Cortober and further analysing the trip distribution patterns and mode share for the town.

Chief Executive's Response

The submission from the NTA is welcomed and, in particular, its comments in support of the strategic aim of the Draft Plan in supporting the increased use of sustainable modes of transport and the level of discourse and detail presented in the Draft Plan with regard to mode share. Furthermore, the Planning Authority welcomes the commitment of the NTA in working with Leitrim and Roscommon County Councils in the future preparation of the LTP for Carrick-on-Shannon. The Chief Executive would also acknowledge the assistance of the NTA in extracting POWSCAR data from the 2016 Census and in discussing appropriate policies and objectives for the Draft Plan.

The Planning Authority is conscious that the preparation of the Draft Plan comes at a time of significant and ongoing revision to national and regional transport policies and therefore has no objection to facilitating the suggested policy amendments to provide greater alignment with emerging national policy.

Equally, the Planning Authority has no objection to the inclusion of the suggested policies/objectives and amendments in respect of content relating to bus service provisions, walking and cycling and parking standards.

Chief Executive's Recommendation

Recommendation No. 97

Amend policy ILU POL 3 as follows:

ILU POL 3 To support the **maintenance and optimisation** ~~enhancement~~ of the county's existing transport infrastructure to ensure its optimal use **in line with National with Investment Framework for Transport in Ireland's (NIFTI's) modal hierarchy** and seek to undertake appropriate traffic management measures to **prioritise road users in line with the modal hierarchy**. ~~reduce congestion and minimise travel times.~~

Recommendation No. 98

Amend policy ILU POL 4 as follows:

ILU POL 4 To strengthen inter-regional connectivity, through the improvement of inter-urban road, **bus** and rail connectivity, with a particular emphasis on improved connectivity between the largest urban centres and access to ports and airports, for the movement of both people and goods.

Recommendation No. 99

Amend policy ILU POL 5 as follows:

ILU POL 5 To promote **the integration of sustainable** land use ~~planning~~ and **transport planning** measures which facilitate **sustainable** transportation ~~options~~ **efficiency**, economic, **societal and climate** returns on transport investment and minimisation of environmental impacts.

Recommendation No. 100

Insert the following policies and objective in Section 8.10 *Public Transport* of the Draft Plan:



PT POL 9 To ensure new development areas and employment land-uses are permeable for walking and cycling and are laid out in such a way as to facilitate the operation of public transport by residents and employees.

PT OBJ 5 To provide suitable infrastructure on public transport corridors to improve safety and efficiency for public transport users.

Recommendation No. 101

Insert the following policy and objective in Section 8.8 *Walking and Cycling* of the Draft Plan:

WC POL 6 To require adequate filtered permeability solutions in relation to large-scale residential, commercial or mixed-use development proposals (both in terms of new development and retrofitting into existing built-up areas) to facilitate active travel, accessibility and connectivity in settlements.

WC OBJ 6 To work with the Active Travel Initiative of the National Transport Authority to deliver a network of cycle routes in towns in order to encourage cycling as an everyday mode choice, in particular to provide cycling infrastructure near schools.

Recommendation No. 102

Amend policy BP POL 1 as follows:

BP POL 1 To ensure the provision of appropriate secure, safe, convenient and accessible bicycle parking facilities as part of any new developments in towns and villages ~~centre-locations~~ to encourage modal shift away from private cars to more sustainable modes of transport.

Recommendation No. 103

Insert the following policy and objective in Section 8.8 *Walking and Cycling* of the Draft Plan:

BP POL 5 To ensure the provision of appropriate secure, safe, covered, lit, convenient and accessible long-stay bicycle parking facilities as part of any new developments such as places of employment or schools to encourage modal shift away from private cars to more sustainable modes of transport.



5.12 Irish Water

Submission Ref. No. DLCDP-202

The submission provides context on national plans and programmes by Irish Water (IW) including the IW's Investment Plan 2020-2024 and the National Water Resources Plan (NWRP). Consultation on the North West Regional Plan will commence later in 2022.

In relation to connections to existing infrastructure, it is the policy of IW to facilitate connections to existing infrastructure where capacity exists, in order to maximise the use of existing infrastructure and reduce additional investment costs. In terms of wastewater treatment, the submission provides an overview of the capacities of the 23 no. wastewater treatment plants (WWTPs) which serve the county with sufficient headroom available for the majority of settlements to cater for the respective growth targets envisaged over the Plan period, with the exception of Carrigallen and Keshcarrigan. In the case of Carrigallen, the submission notes that a project is underway which will provide capacity for the projected growth and is anticipated that this will be completed within the Plan period.

The submission also provides commentary on sewer network capacity and performance, detailing where local network upgrades are required e.g. upgrades to wastewater pumping stations (WWPSs) etc., and highlights that any additional development which adds loading onto the Drumshanbo and Mohill WWTPs will have to show that it does not give rise to a significant breach of Regulation 43 of the Waste Water Discharge (Authorisation) Regulations 2007, as amended, for these WWTPs. There is potential spare capacity only in Drumshanbo and Mohill as a result.

In terms of piped water infrastructure, IW anticipates that ongoing upgrade works and leakage reduction activities in the Carrick-on-Shannon Regional Water Supply Scheme (RWSS) will provide capacity to accommodate growth in the short term. However, a further upgrade at the Carrick-on-Shannon Water Treatment Plant (WTP) may be required to cater for the targeted growth in Carrick-on-Shannon and its environs. Planning for this upgrade has commenced and it is envisaged that it will be delivered in the 2025-2029 Investment Plan period, subject to funding and statutory approval.

The submission emphasises that for all Water Resource Zones (WRZs) where there are deficits, leakage control and water conservation will be of utmost importance and the availability of water will be on a first come, first served basis with priority given to domestic customers.

More general commentary is provided in the submission in respect of IW's role in addressing the impacts of climate change, maintaining drinking water source protection, its support of the River Basin Management Plan (RBMP) Implementation Strategy, supporting the implementation of SuDS and the enhancement of green and blue infrastructure and the development of planned public realm and road projects.

The submission concludes with suggested minor amendments to text and policies/objectives contained in the Draft Plan.

Chief Executive's Response

The submission from Irish Water is welcomed and its observations are noted. The Planning Authority has no objection to the incorporation of the additional wording / corrections as proposed in the submission.



Chief Executive's Recommendation

Recommendation No. 104

Amend objective RUR SET OBJ 6 as follows:

RUR SET OBJ 6 The Planning Authority shall provide a detailed report within one year of this County Development Plan coming into effect identifying all potential sites within villages and possibly graigs that are considered suitable to accommodate low density housing proposals. Where there is an issue in relation to the provision of piped wastewater treatment in villages (Glenfarne, Kilclare and Rossinver) and in graigs, the Council will pursue the resolution of such constraints in conjunction with **the Department of Housing, Local Government and Heritage and Irish Water**, and seek to explore appropriate funding measures for same.

Recommendation No. 105

Amend objective ENT EMPL OBJ 4 as follows:

ENT EMPL OBJ 4 To work with Irish Water, **having regard to its connections policy**, and other infrastructure providers, to support the provision of services and facilities to accommodate the future economic growth of the county and to seek to **provide** infrastructure capacity for employment generating uses.

Recommendation No. 106

Insert the following text at Section 8.11.2.5 – *Exceptional Circumstances*:

Public water and wastewater projects will be progressed in the county over the coming years which may require the creation of additional access points or the generation of increased traffic from existing accesses to national roads to which speed limits greater than 60 km/hr apply. These projects are necessary to meet strategic growth and environmental objectives in local, regional and national planning policy. Such projects may also be applicable to the provisions of 'exceptional circumstances' and subject to engagement between Irish Water, TII and Leitrim County Council.

Recommendation No. 107

Amend Section 5.8.2 – *Wastewater* of Volume II – *Settlement Plans* in relation to the settlement plan for Drumshanbo as follows:

The Drumshanbo wastewater treatment plant, which has been the subject of recent upgrade works conducted by Irish Water, is designed to collect and treat effluent from a population equivalent (P.E.) of 4,000. The 2020 Irish Water Annual Environmental Report indicates a remaining capacity of 2,327 P.E. **Irish Water have advised the Council that this treatment plant is recorded as not being compliant with Wastewater Discharge License standards but capable of achieving at least Urban Wastewater Treatment Directive standards.** Accordingly, given the substantial capacity available within the treatment plant, it is not envisaged that this will be exceeded during the lifetime of this plan, **however whilst there is potential spare capacity at this treatment plant, connection applications will be assessed individually by Irish Water depending on their specific load requirements.**

Recommendation No. 108

Amend Section 7.8.2 – *Wastewater* of Volume II – *Settlement Plans* in relation to the settlement plan for Mohill as follows:



The Mohill wastewater treatment plant, which has been the subject of recent upgrade works conducted by Irish Water, is designed to collect and treat effluent from a population equivalent (P.E.) of 1,800. The 2020 Irish Water Annual Environmental Report indicates a remaining capacity of 515 P.E. Irish Water have advised the Council that this treatment plant is recorded as not being compliant with Wastewater Discharge License standards but capable of achieving at least Urban Wastewater Treatment Directive standards. Accordingly, given the substantial capacity available within the treatment plant, it is not envisaged that this will be exceeded during the lifetime of this plan, however whilst there is potential spare capacity at this treatment plant, connection applications will be assessed individually by Irish Water depending on their specific load requirements.

Recommendation No. 109

Amend Section 8.2.2 – *Wastewater* of Volume II – *Settlement Plans* in relation to the settlement plan for Carrigallen as follows:

The village benefits from a wastewater treatment plant. ~~with capacity to accommodate additional loading.~~ Based on information provided from Irish Water, there is currently no headroom at the treatment plant, however works are underway at the plant which will provide capacity for the projected growth of the settlement, and it is anticipated that this will be completed within the Plan period.

Recommendation No. 110

Amend Section 21.2.2 – *Wastewater* of Volume II – *Settlement Plans* in relation to the settlement plan for Keshcarrigan as follows:

Keshcarrigan is served by a wastewater treatment plant, ~~with some capacity to accommodate additional loading.~~ however, at the time of writing the plant had no headroom based on the Irish Water Wastewater Capacity Register (dated March 2022).

Recommendation No. 111

Amend paragraph no. 2 of Section 6.10.2 – *Land Use Zoning Principles* as follows:

An infrastructure assessment was undertaken to differentiate between zoned land that is available for development and that which requires significant further investment for such development to be realised. This is referred to as a 'tiered zoning approach' and is required by the NPO 72 of the NPF. Irish Water were integral to the undertaking of this assessment and their co-operation is acknowledged in this regard. However It is the expressed view of Irish Water that ~~there was not considered~~ the county is well served by its water and wastewater treatment plants and, notwithstanding constraints associated with the Carrick-on-Shannon water treatment plant and the wastewater treatment plants at Drumshanbo, Mohill and Carrigallen which are expected to be addressed over the lifetime of the Plan, there were no capacity issues in any wastewater treatment plant or water treatment plant identified which would prohibit the realisation of the household or population levels stated in the Core Strategy of this Plan.



5.13 ESB

Submission Ref. No. DLCDP-205

From the outset, the submission broadly supports the vision included in the Draft Plan and provides an overview of its strategy and its generation, transmission and distribution assets within the county, as well as its future plans in the roll-out of electric vehicle (EV) infrastructure and its role in the provision of telecommunications infrastructure.

The submission provides a number of observations on the Draft Plan under the following headings:

1. Electricity Generation, Transmission & Distribution

ESB welcome supporting statements in the Draft Plan that seek to reinforce the existing grid including grid connections, transboundary networks into the county and the expansion into areas not adequately serviced and support for energy utility providers to reinforce and strengthen existing utility infrastructure and transmission/distribution networks. Policies ENI POL 3 and 4 and Objective ENI OBJ 1 are highlighted in this regard.

2. Generation & Renewables

ESB acknowledge the overall consistency and alignment with the objectives of the NPF, RSES and national guidelines and provides commentary on the following renewable energy generation and storage technologies:

Onshore Wind

ESB acknowledge that the *Draft Revised Wind Energy Development Guidelines 2019* (DHPLG) and the SEAI's *Methodology for Local Authority Renewable Energy Strategies* (LARES) have been used to inform wind energy policy in the Draft Plan. ESB acknowledge that the Methodology set out in Appendix IX Parts A & B of the Draft Plan identifies the most suitable locations for wind energy development, with the identified areas derived following a comprehensive sieve mapping analysis.

ESB also welcomes the provision of supporting objectives for the repowering of existing wind farms in the Draft Plan also.

Solar

ESB welcome the support for the development of solar energy in the county as set out in the Draft Plan under Policies SE POL 1-6, and the reinforcement of these policies in the Draft RES and Section 13.20.2 – *Solar Energy in the Development Management Standards* of the Draft Plan in the absence of national guidance on solar energy development. Reference is made to suitable lengths of planning permission and operational permission (suggested up to a maximum of 40 years) associated with such developments.

Energy Storage

The submission notes the support for energy storage technologies, highlighting Policy ES POL 1 in particular, as well as emphasising the growing demand for such storage facilities in the future.

3. Telecommunications

ESB supports the approach and view of the Council in facilitating the provision of telecommunications infrastructure at appropriate locations and in accordance with national guidance.

4. Sustainable Transport & Electric Vehicles

The support for electric vehicles throughout the Draft Plan is acknowledged, with Policies EV POL 1-3, and underpinned by the parking standards set out in Section 13.16.10 – *EV Charging Points*, seeking to



support the expansion of the EV charging network. Notwithstanding, the ESB reference the provisions of the EU Energy Performance of Buildings Directive which calls for an increase to 20% in the number of car parking spaces which should have provision for EV charging infrastructure. Amendments to the Development Management Standards are proposed in this regard.

Chief Executive's Response

The Planning Authority welcomes the submission from ESB including its support for the vision of the Draft Plan. Equally, the acknowledgement of ESB on the alignment of the various energy infrastructure policies and objectives provided in the Draft Plan with national and regional policies is also welcomed, particularly in relation to its comments on the approach undertaken with regard to the Draft Renewable Energy Strategy.

In relation to its comments on the planning and operational permission durations for solar energy projects, and its reference of up to 40 years life-span of such projects, it is considered that this is primarily a development management consideration which is assessed on a site specific case by case basis. It is considered more appropriate to deal with the matter by way of a condition in a planning permission rather than a general, prescriptive policy or objective in the Draft Plan.

In light of the EU Energy Performance of Buildings Directive, it is considered appropriate to revise the Development Management Standards relating to EV vehicles.

Chief Executive's Recommendation

Recommendation No. 112

Amend Section 13.16.10 – *EV Charging Points* as follows:

All developments should provide facilities for the charging of battery-operated cars at a rate of up to ~~10%~~ 20% of the total car parking spaces. The remainder of the parking spaces should be constructed (wiring and ducting provided) so as to be capable of accommodating future charging points, as required. New residential development should accommodate at least one car parking space equipped with two EV charging points for every ten no. car parking spaces being provided for the associated development. The remainder of the car parking spaces should be constructed so as to be capable of accommodating future charging points, as required. EV charging spaces should be clearly demarcated with appropriate signage.

SECTION 6
GENERAL SUBMISSIONS

6 GENERAL SUBMISSIONS

6.1 Introduction

This section provides a summary of the issues raised in submissions from non-prescribed bodies, stakeholders and the general public on the content of the Draft Plan, as well as the respective responses and recommendations of the Chief Executive to the issues raised in these submissions.

As referenced previously in Section 1.2 of this report, a number of submissions received in the public consultation process related to similar development themes associated with the Draft Plan, with some themes receiving multiple submissions. Accordingly, given the commonality of the issues raised in such submissions, these are collated and responded to according to development theme rather than individually. In adopting this approach, the report negates the need for the unnecessary proliferation and replication of identical responses and recommendations to the same items raised in the individual submissions, resulting in a more concise and coherent report that comprehensively addresses such themes.

6.2 Forestry

Submission Ref. Nos. DLCDP-49; DLCDP-50; DLCDP-53; DLCDP-70; DLCDP-99; DLCDP-135; DLCDP-169; and DLCDP-183

A number of submissions have been received in relation to forestry in Co. Leitrim and the provisions afforded in the Draft Plan relating to this item, principally Section 10.6 *Forestry*. Recurring issues cited in the submissions are the adverse impacts arising from commercial forestry practices in the county in terms of:

- impacts on sensitive landscapes and landscape capacity to assimilate future commercial forestry planting;
- ecological and biodiversity impacts i.e. monoculture species; loss of High Nature Value farmland (HNVF) to accommodate commercial forestry plantations;
- social impacts associated with commercial forestry developments and the level of constraints excessive afforestation levels have on traditional farming practices and sustaining rural communities;
- adverse impacts on the residential amenities of neighbouring properties;
- impacts on water quality and the potential to give rise to flooding impacts;
- impacts on surface water drainage/runoff;
- impacts on soil stability arising from clearfell and replanting on deep peat lands;
- impact of non-indigenous species or 'invasive' species on native trees;
- impacts on infrastructure such as the road network; and
- overestimation of carbon sequestration net value of commercial afforestation and its value as a means of mitigating against the effects of climate change and contributing towards climate action targets.

In addition to the above items, frequent reference is made in the submissions to the scale of afforestation in the county, particularly in comparison to the rate of land cover of forestry in other counties and at a national average, with forestry landcover in Co. Leitrim substantially above other such comparators elsewhere in the country.



A number of submissions make reference to the consent processes associated with forestry practices, typically by way of licensing (i.e. for felling, afforestation or aerial fertilisation) with most forestry operations exempt from the requirement to obtain planning permission. The lack of effective public engagement and consultation in current consent processes is also frequently cited, which have disenfranchised and marginalised the views of local communities regarding fundamental changes of land use in such areas. The lack of regard to the views of the Local Authority in the decision making by the Forestry Service is cited in a number of submissions which is contrary to the principles of subsidiarity.

Suggested amendments to the legislation governing forestry practices and their assessment, particularly from an EIA perspective, are provided in some of the submissions also.

Other suggested references or policy provisions include recourse for recovering the cost of damage to public roads from contractors/hauliers/forest owners.

Cumulative effects and impacts of multiple areas of afforestation should also be considered in respect of Environmental Impact Assessment by competent authorities as part of the consent mechanism for afforestation licensing.

Draft policy FOR POL 5 should be strengthened to provide for greater engagement from the Council in liaising with the Forest Service rather than responding to referrals from the Forest Service. Other submissions emphasise that the Council should undertake a more active role in appealing to the Forestry Appeals Committee.

The submission from Save Leitrim (Ref. No. DLCDP-135) makes reference to the draft Landscape Capacity Study for Commercial Plantation Forestry, which was not sufficiently advanced enough in its draft form for publication alongside the Draft Plan during the public consultation, with the submission emphasising that this assessment needs to inform the Plan and the level of afforestation which can be assimilated into the landscapes of the county.

Other submissions have stated that the Council should consider all lands over the 250m contour as Landscape Conservation Areas and also some lower elevation sites as well, including around Loughs as a means of bringing exempted development including agricultural development and development undertaken by statutory undertakers within planning control.

Chief Executive's Response

The Planning Authority has carefully considered the various submissions received with respect to forestry noting that there is considerable overlapping / duplication between a number of the submissions received. The Planning Authority acknowledge in particular the extent of research and analysis contained in submission no. DLCDP-53 by Mr. Neil Foulkes which would appear to have been relied upon in a number of the other submissions received. The level of detail in the submission from the Leitrim IFA on forestry is also commendable and welcomed.

The Planning Authority would accept the merit of a lot of the points made in the submissions received in relation to forestry and in particular the extent and impact of coniferous plantations planted since the last County Development Plan was adopted and took effect in 2015. The devastation effect presented in a clear felled plantation is not replicated in any other harvested landcover. The frustrations evident in a number of the submissions in relation to national forestry policy and financial incentives supporting the current model is acknowledged. The desire in the submissions for the County Development Plan to set out clear priorities and principles for forestry development is also strongly evident throughout. The submissions do recognise that the Local Authority must work within an



existing legal structure of consents but requests a more robust involvement by the Local Authority where such decisions are in conflict with local priorities as set out in the Plan. The statements in the introduction to Forestry in the Leitrim IFA submission is also reflective of the disproportionate level of afforestation in our county (and adjoining counties) which is contended to be resulting in negativity, damaging the perception of forestry among farmers and the impact of outside investors planting land in communities in which they do not live. The concept of societal licence to operate for forestry to be sustained in the medium to long term is a particularly interesting concept which supports the views of other submissions to stop thinking of the value of forestry only in the context of it being a crop.

It is not considerable feasible within the scope of this report and the time period allocated within legislation to identify and address each and every point made in the various submissions received such is the level of detail contained in some of the submissions. Each submission has been carefully considered and taken into account in the recommendation contained at the end of this section of the report. In a similar manner, the extensive suggestions for amendments to proposed policies and objectives have been considered along with recommendations for additional policies and objectives as contained in the submissions.

The submissions query why certain elements of the previous narrative of the forestry section from the 2015-2021 County Development Plan have been removed whilst also indicating that there is a lot of copy and paste from the previous plan without any assessment as to what has happened in the intervening period.

Arising from consideration of the submissions, an entire review of Section 10.6 '*Forestry*' has been completed and this is recommended as a material alteration to the Draft Plan to the Elected Members. This review has provided clarifications on the source of data used in relation to certain statistics and has had regard to certain recommendations of the need to qualify or amend statistics contained in the Draft Plan. A greater degree of balance is considered to be now contained in the section than in the original draft in which issues such as carbon sequestration, biodiversity, etc, in relation to forestry have been restated or rebalanced. Where the Planning Authority could not identify or validate the source of elements of the narrative, the statements have been removed and replaced, in particular in relation to landscape considerations.

The Draft Plan stated in Section 10.6.4 '*Afforestation and the Landscape*' that the Council were presently undertaking a landscape capacity assessment of the ability of the landscape to absorb further commercial forestry plantations. It was hoped that this would be completed in time to inform the final County Development Plan before it is finalised. This report has now been completed and was submitted to the Elected Members under separate cover from this Report a couple of weeks ago with a workshop to assist the Elected Members understanding of the report scheduled for Monday next, July 25th.

The '*Landscape Capacity Assessment for Commercial Forestry*' report has informed greatly the revised policy framework contained in this section of the Draft Plan. The report considers the capacity of the 17 no. Landscape Character Types on an individual basis to absorb further commercial forestry plantations. The impact of further planting on adjoining Landscape Character Types that are more sensitive is also carefully considered. The report culminates in the recommendation for each Landscape Character Type as having no capacity, very limited capacity, limited capacity or capacity for further planting. This will be used as the basis for the submissions by the Local Authority to future tree planting applications to the Forest Service. Similar consideration to tree felling licenses will be made however noting that it is generally a requirement of legislation to replant an area consented for felling within 2 years of felling in line with the Department's Felling Reforestation Policy (May 2017). The exceptions to this policy are noted. The report provides an up to date evidential basis of each

Landscape Character Type having regard to the extent of planting which has occurred and replacing the previous consideration of forestry as contained within the 2002 Landscape Character Assessment report. The Planning Authority is not aware of any other Local Authority which has undertaken such an assessment reflective of the level of importance which this Authority places on this growing issue.

A copy of the report, *Landscape Capacity Study for Commercial Forestry - Co. Leitrim (March 2022)*, is included as Appendix 2 of this Report.

The Local Authority does not have the resources to undertake a report into the economic impact of commercial forestry planting on traditional farming practices. The primary function of the Development Plan is to provide a land use strategy for the county which this Plan achieves. It also is cognisant of the wider national policy framework which such a land use strategy must integrate with and the statutory regulatory consent role which the Local Authority is responsible for.

The Planning Authority do not consider it appropriate to accede to the detailed list of principles or considerations in relation to FOR POL 5 outlined in a number of the submissions. The responses to applications submitted to the Forest Service which the Local Authority will make will be governed by the policy framework contained in the Draft Plan both within the Forestry section and other relevant sections. The Local Authority are aware of the provisions of the Roads Act in relation to recouping costs arising from activities. There is no necessity to restate such provisions in a Development Plan. The Local Authority are not aware of any legal remit available to it to require the removal exotic tree species which have spread by natural regeneration onto land.

It is not considered that there is an accepted basis for the Local Authority to determine the socio economic impact of a forestry proposal on an individual community in comparison to the impact on a receiving landscape. On the basis, the Planning Authority cannot accede to the recommended amendment to FOR POL 3 submitted by the Leitrim IFA.

It is considered that the recommendations contained within the Leitrim Tourism Network submission in relation to hedgerows, treelines and woodlands can be considered in the detailed design, construction and management of the greenways when delivered rather than requiring inclusion within the Development Plan. The comments are duly noted and will be taken into consideration as the design of the individual greenways progresses.

Chief Executive's Recommendation

Recommendation No. 113:

To amend Section 10.6 *Forestry* of Draft Plan as follows and to include the report titled *Landscape Capacity Study for Commercial Forestry - Co. Leitrim (March 2022)* as Appendix VI of the final Draft Plan when adopted. This will require a renumbering of the remaining 6 no. appendices as they are numbered on the basis of their respective chapters.

10.6 Forestry

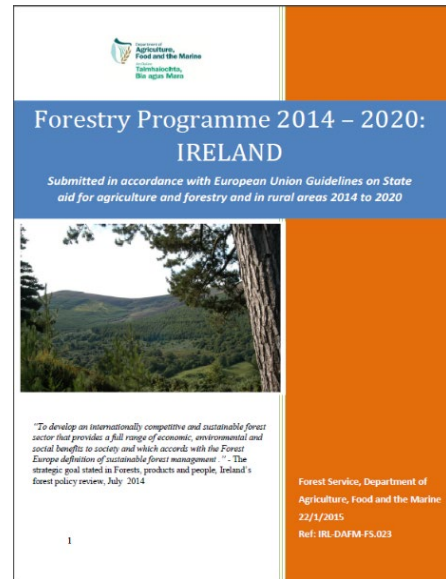
10.6.1 National Policy

The national policy and ambition on forestry (plantation forestry) is extremely clear as set out in the Forestry Programme 2014 – 2020 which is presently being reviewed. The Forest Programme seeks “to develop an internationally competitive and sustainable forest sector that provides a full range of economic, environmental and social benefits to society and which accords with the principles of sustainable forest management”.



To realise this ambition, there are a series of financial supports in place of up to 100% set up grants for establishment and maintenance of new plantation forests and woodlands including fencing. The grant aid and premiums on offer depend on the species planted with higher rates available for deciduous trees.

The Climate Action Plan 2019~~21~~ states that under the current National Forestry Programme, 2014–2020, afforestation rates have been recorded at an average of 5,500 ha per year. This is below the target rate and at these rates, Ireland will not achieve its 18% land cover target by 2046. The Climate Action Plan seeks to increase afforestation rates from their current levels to an average of 8,000 ha per year, in order to reach our forestry land cover target of 18% by the second half of this century. This will be achieved through engaging with a range of landowners, from farmers through to State Bodies and Local Authorities. While this will mostly yield benefits in the longer term, it will also contribute to our 2030 target through carbon sequestration and displacing other high carbon uses of land. It is also proposed to supplement the attractive financial incentives already in place (for faster afforestation, sustainable forest management, and wood mobilisation). provides for a number of actions relating to forestry development and recognises the important role forestry provides as the single largest land-based climate change mitigation measure available to Ireland. In addition, the Plan recognises the increasing potential of forestry in providing sustainable substitute products for conventional carbon-heavy construction materials such as concrete, brick and steel. Relevant actions provided in the Climate Action Plan 2021 relating to forestry development include:



- the implementation of ‘Project Woodland’, the government initiative to develop a shared approach for trees, woods and forests and to inform the preparation of the new Forestry Strategy and new Forestry Programme for publication in 2023 (Actions 364 and 365);
- Implement Forestry Programme 2014-2022 (includes 2-year extension) (Action 366);
- Increase the level of afforestation to meet targets (Action 367); and
- Increase output of forestry licences to meet demand (Action 368).

It is notable that, aside from Action 367 which identifies the planting of 1,500ha of native woodland on Bord na Móna cut-over-bogs and unlike the previous Climate Action Plan 2019, no other planting target is provided in the Climate Action Plan 2021, with the presumption that the new Forestry Programme to be published in 2023 will identify such targets.

Forestry can play an important role in helping with climate change mitigation, through carbon sequestration and the provision of renewable fuels and raw materials. Forestry is a major carbon sink and afforestation is the most significant mitigation option that is available to Ireland’s land use sector.

Ireland is committed to the practice of Sustainable Forest Management, which, under the Helsinki and Lisbon Agreements, means *‘the stewardship and use of forests and forest lands in a way and at a rate that maintains their biodiversity, productivity, regenerative capacity, vitality and their potential to fulfil now and in the future, relevant ecological, economic and social functions as local, national and global levels and that does not cause damage to other ecosystems’*. A key objective of the Department of Agriculture, Food and the Marine’s ‘Growing for the Future – A Strategic Plan for the Development of the Forestry Sector in Ireland’ (1996) has remained *‘to develop forestry to a scale and in a manner*



which maximizes its contribution to national economic and social well-being on a sustainable basis and which is compatible with the protection of the environment'.

10.6.2 Forestry in Leitrim

Co. Leitrim has the highest ratio of forestry planted of any county in the State at 18.9% in 2017 compared to the national average level of 11%. Preliminary results from the 4th National Forestry Inventory (NFI), completed in 2022, indicates that the extent of forest cover in the county in 2021 has increased to 20.1% (32,039ha), with Leitrim remaining the county with the highest percentage of forest cover, compared to a national average level of 11.6%². Notwithstanding these preliminary results, it should be noted that at the time of writing the 3rd edition of the NFI, conducted in 2017, remained the most comprehensive dataset on national forest cover.

The soils in Co. Leitrim are generally well-suited to commercial forestry plantation development as they are rich in mineral gley, surface water gley, peaty gley and brown poolzolic soils. The favourable soil and climatic conditions result in relatively rapid growth rates of coniferous species where the strength and quality of the wood is less than where it grows at a slower rate. However, Furthermore, poor root penetration can often lead to windthrow with its associated environmental consequences including aquatic issues arising.

Private plantation forests accounted for just over half (51.3%) of the forest area in the county in 2017 with the remaining (48.7%) consisting of publicly owned forestry managed for the State by Coillte. The extent of these lands are shown in Figure 10.2. This is qualified by noting that an additional 846 hectares of lands have been planted since 2017 up to and including 2021 based on the *Forest Statistics Ireland 2022* report from DAFM.

² 'Forest Statistics Ireland 2022', Department of Agriculture, Food and the Marine (2022)

Figure 10.2: Extent of Forest Cover in Co. Leitrim 2017

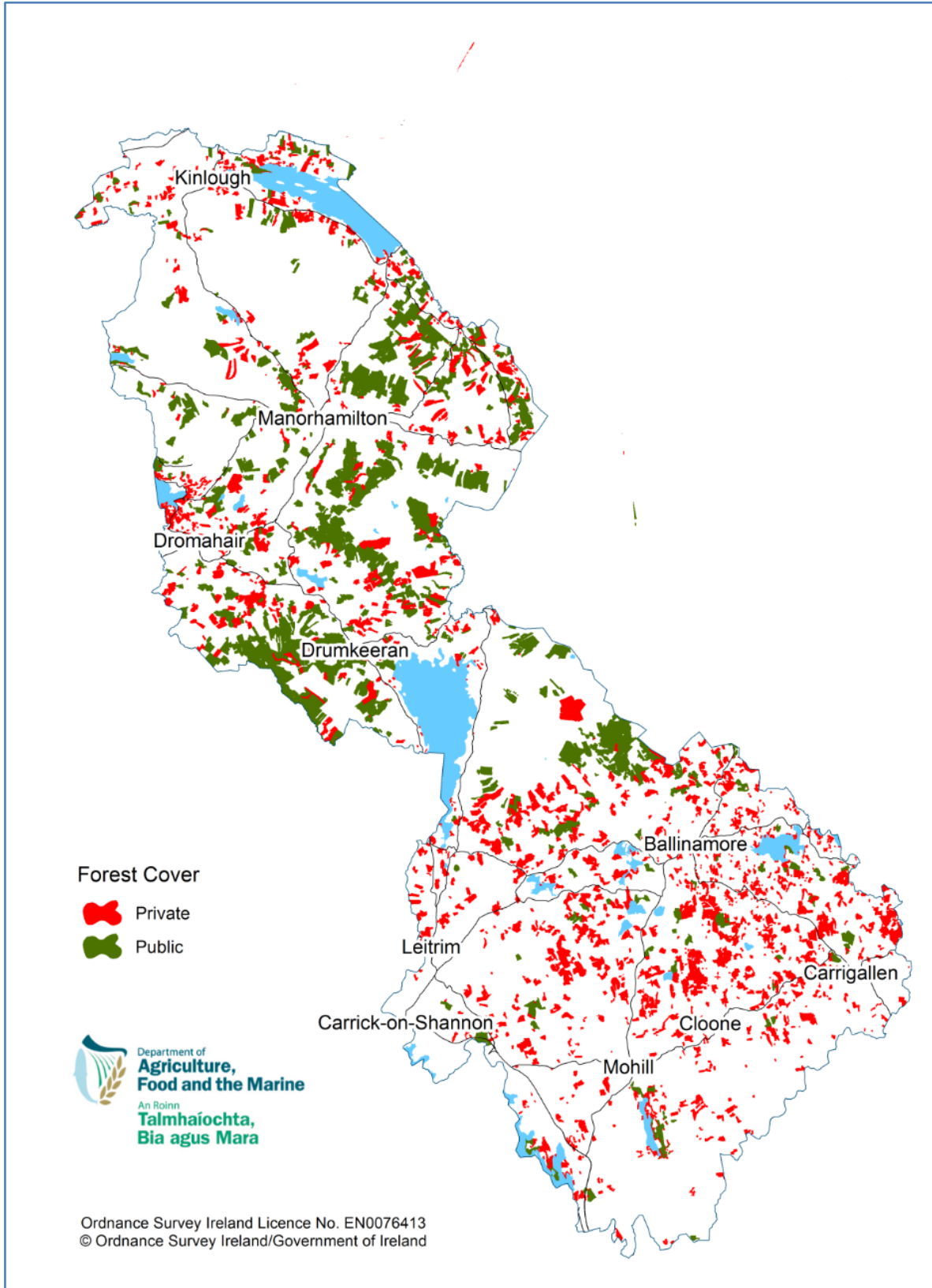
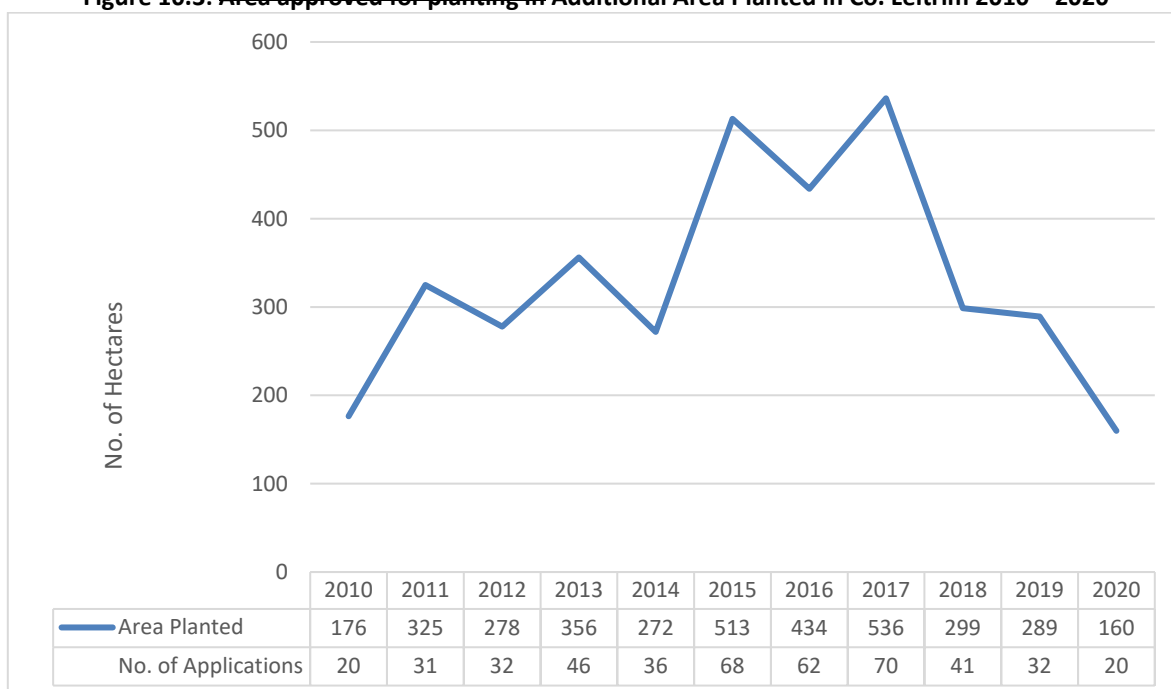
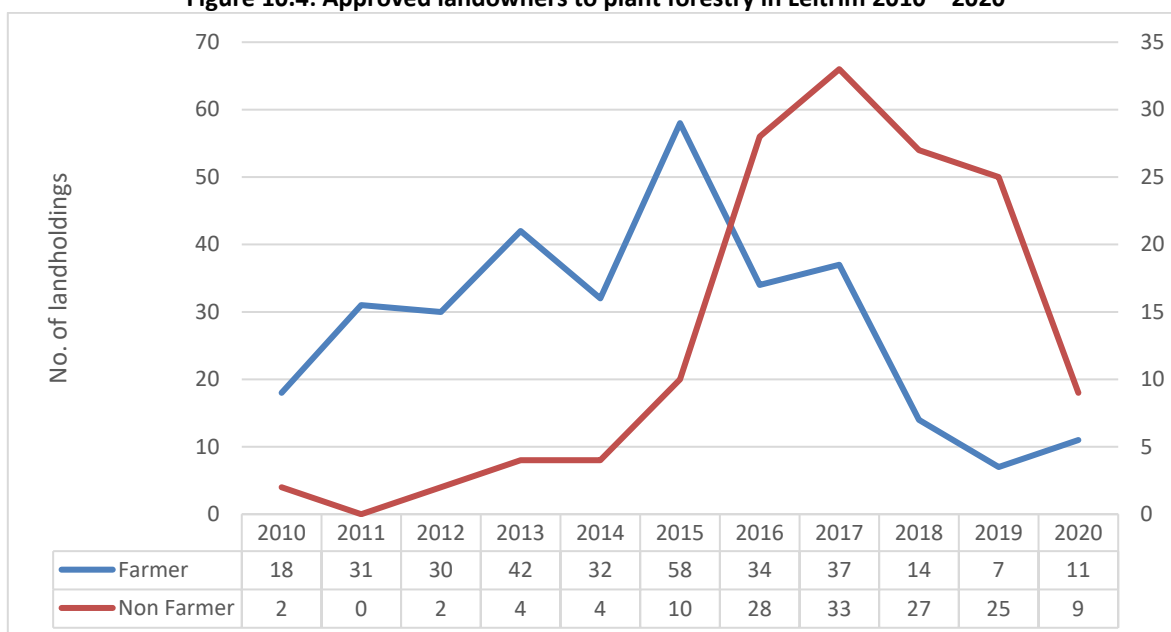


Figure 10.3: Area approved for planting in Additional Area Planted in Co. Leitrim 2010 – 2020



Source: Forest Service, Department of Agriculture

Figure 10.4: Approved landowners to plant forestry in Leitrim 2010 – 2020



Source: Forest Service, Department of Agriculture

In terms of species, conifers account for 70% of the total forest area in the county. Sitka spruce is the dominant species accounting for 61.3% of the total forest area which is higher than the national figure of 51%. The growth rates of trees in the county for conifers is high – for Sitka spruce in private stands, growth rates are estimated to be 20% higher than the national average. Native species account for 30.7% of the forest area in the county which is slightly higher than the national figure of 26.6%. Birch is the dominant native species accounting for 10.7% with alder accounting for 4.8%. **The figures in this paragraph are extracted from the report ‘The Socio-Economic Impact of Forestry in Co. Leitrim’, Dr. Áine Ní Dhubháin *et al*, (2019) School of Agriculture and Food Science, University College Dublin.**



Figure 10.3 indicates a steady rise in the extent of land approved for planting ~~by the Forest Service~~ **planted in Co. Leitrim** from 176 hectares of land in 2010 to 536 hectares in 2017. The number of landholdings in 2017 was 70 and the average holding ~~approved for planting~~ **planted** was 7.7 hectares/19 acres (Figure 10.4). There has been a marked reduction in the number of applications approved since 2018, ~~primarily as a result of the number of appeals brought against decisions.~~ **It should be qualified that Figure 10.3 relates to lands actually planted and should not be confused with the extent of lands licensed for afforestation by the Forest Service. For instance in 2021, 98 hectares of lands were planted for commercial forestry whilst 236 hectares of lands was licensed for planting. The license holder has 3 years from the date of a license to plant.**

Of particular note from Figure 10.4 is that ~~in 2015 marked a milestone in which~~ **in 2015** the number of investors or non farmers who were approved to plant commercial forestry in Co. Leitrim exceeded the number of farmers who were approved to plant part of their own lands. This resulted from changes in the grant aid provided by the Department of Agriculture which now encouraged investors into the sector to assist in reaching the national target set out in the Forestry Programme. In each subsequent year since 2015, the number of investors or non farmers approved for planting has exceeded the number of farmers approved to plant their own lands. **This may have included farmers from outside the county who have acquired lands in this county as an investment or as a means of offsetting carbon from their main farming activities. This level of information was not available to the Local Authority.**

Notwithstanding the thrust of Government policy, the extensive volume of afforestation in Co. Leitrim raises some concerns. Once planted for forestry, land is unlikely ever to revert to alternative agricultural use, reducing the possibility of expanding or consolidating neighbouring farms. Extensive and dense tree planting can lead to an oppressive and featureless landscape, increasing the sense of isolation of remaining residents, while clear-felled forests leave an ugly scar on the landscape. The harvesting of timber **which often necessitates the construction of extensive lengths of forest access roads** can put great stress on the road network, with minor roads bearing loads far beyond their design capacity. It is argued by the haulage sector that the creation of forest access roads can have a far greater impact on the surface of local roads than the extraction of timber. **The Department of Agriculture, Food and the Marine have indicated in their Forest Statistics Report (July 2022) that between 2011 -2021, the construction of 42.8km of private forest roads were grant aided in Co. Leitrim³. The Local Authority is left to rely on the provisions of the Roads Act 1993, as amended, to seek to recover the cost of damage to local roads but with very limited success.**

However, it is important to recognise the value of forestry related employment with 560 jobs⁴ associated directly and indirectly with forestry/wood processing in Leitrim (2018). All elements of the **commercial plantation** forestry value chain are present in Co. Leitrim – forestry contractors and management companies, forest harvesting and haulage (McMorrows Haulage Ltd., Dowra), saw mills and manufacturing (Crowes, Mohill), firewood (McMorrows, Dowra) and manufacturing (Masonite, Drumsna and Merenda, Manorhamilton). **It is also acknowledged that the lands planted with commercial plantations often replaces land that was previously farmed and that there is a potential displacement employment effect as a result of lands being planted. In addition to the socio economic costs, the impact of the loss of agricultural land on sustaining a rural farming population does need careful consideration at a national policy level. The results of the Census of Agriculture 2020 were not available to inform the preparation of the Draft Plan.**

~~The Good Energy Alliance Ireland produced a Greenhouse Gas Emissions Baseline Report for Co. Leitrim in December 2019. It is estimated that forestland removes over 190,000 tonnes of CO² equivalent from Leitrim in effect offsetting 44% of the CO² produced by our population. This has a~~

³ 'Forest Statistics Ireland 2022', Department of Agriculture, Food and the Marine (2022)

⁴ This figure was provided to the Local Authority by the Department of Agriculture, Food and the Marine



monetary equivalent of just under €5m. Forests and forest products therefore play an important role in mitigating climate change by sequestering and storing atmospheric carbon dioxide (CO²). Fast growing Sitka Spruces perform better when it comes to removing carbon from the atmosphere, as opposed to native woodland, hence their utilization as a quick return climate mitigation policy tool. The carbon sequestration rate per hectare by forests in Co. Leitrim is deemed to be 12% higher than the national rate. About 45-50 hectares of forest are clear felled each year;

Of the total amount of commercial forestry that is clear felled each year (979 hectares licensed to be clear felled in 2021), 30% of the total tree volume is left on the forest floor after logging with the remaining 10% used for wood fuel. The remainder, 60% is processed, mainly for the construction industry. the CO² captured during the tree life remains locked in the wood until the product decays or is burnt. This excludes consideration to the clear felling and thinning of commercial forestry, transporting and processing the timber product and the burning of wood products for energy all of which causes emissions of carbon to the atmosphere whilst clear felling results in significant carbon losses from the soil.

The nature of commercial plantation forestry in Co. Leitrim is such that until a more detailed study is undertaken of the previous use of the lands planted / licensed to be planted regarding their former carbon sequestration function to include peatlands and the environmental cost of harvesting to include creation of extensive forest access roads that the true climate change mitigation impact is unquantified. Equally, there has to be an acknowledgement of the addition of carbon to the atmosphere from the burning of wood products.

10.6.3 Afforestation and the Planning System

Afforestation as a land use is, in the main, outside the control of the Planning Authority with the exception of the creation and material widening of accesses onto the national road system or when an Environmental Impact Assessment Report is required for planting of more than 50 hectares. Initial afforestation of lands is classified as exempted development which does not require planning permission. To date, no planning application lodged to this Authority for the planting of trees. Certain categories of consent applications to the Forestry Service, being part of the Department of Agriculture, Food and Marine, for planting or felling are referred to the Planning Authority for its observations but it is the Forest Service, as competent authority, who ultimately decides upon the submitted consent application and how much weight to attribute to the Planning Authority's comments. This Council would welcome a revision of the Planning legislative provision that would bring forestry plantations under the control of the planning system.

10.6.4 Afforestation and the Landscape

The Landscape Character Assessment (refer to Section 11.15) has identified forestry along with wind turbines as the greatest forces of change in altering the character of our landscape. Commercial forestry plantations tend to be a dominating landcover and have an eroding impact in scenic areas of the county including Lough Melvin. The original lakeside landscape character is much eroded as a result. The review noted an increase in commercial coniferous forestry especially apparent in the farmed lowlands south of Slieve Anierin and similar plantations of smaller scale occur in the uplands in particular the lower slopes of Dough Mountain. The Character Assessment states that the extent of additional forestry land use "is controversial due to the resultant change and negative impact on the County's landscapes". In Landscape Character Type 3 'Wooded Lakeside Farmland', the extent of the woody vegetation cover is such that the landscape is quite visually enclosed in many places. In Landscape Character Type 5 'Moorland Plateaus', patches of commercial coniferous forestry feature in this landscape and in some locations, these plantations dominate and have eroded the moorland landscape character. The plantation of commercial coniferous forestry also tends to be highly visible at higher elevations. In Landscape Character Type 9 'Drumlin Farmland', patches of commercial

coniferous forestry are dispersed throughout this landscape, some areas being fairly extensive in size. The plantation of coniferous forest is indicated as being a frequent feature and has become influential in the local landscape character.

It is noted that there is an area of deciduous woodland at O’Donnell’s Rock which is one of only a few naturally developing woodlands on the Leitrim limestone mountains. This is of particular interest as it demonstrates the natural succession of this woodland type on steep ground.

In relation to landscape quality, condition and sensitivity, the Landscape Character Assessment indicates that the condition of the landscape is adversely affected in places by commercial coniferous forestry. Extensive areas of commercial coniferous forestry have resulted in the loss of hedgerows, pasture and field patterns and thus, key landscape characteristics have become eroded. Plantation of coniferous forestry also obscures stretches of the Black Pig’s Dyke and tree roots threaten delicate archaeological remains. Where large forestry blocks exist on undulating landform, large scale felling, leaves significant areas of the landscape scarred. In comparison, in areas where commercial coniferous forestry is absent, the landscape is in relatively good condition as evidenced by the strong field patterns defined by a dense hedgerow structure.

Following the completion of the review of the Landscape Character Assessment, of designated landscapes and of protected views and prospects, Leitrim County Council commissioned RPS to then undertake a landscape capacity assessment for future commercial forestry planting in Co. Leitrim. The purpose of the landscape capacity assessment is to inform the policy framework for forestry which will be contained in the Draft County Development Plan 2023-2029. The objective of the study is to determine the suitability or capacity of landscapes to accommodate further commercial forestry plantations. The assessment has been undertaken in order to provide clear guidance in the light of recent debate on the issue of commercial forestry in Co. Leitrim and the need to achieve a balance between the national policy arena, the demands for commercial forestry plantations and conservation of landscape character and visual amenity including residential visual amenity. This report titled ‘Landscape Capacity Study for Commercial Forestry - Co. Leitrim (March 2022) will form Appendix VI of the final Draft Plan when adopted.

The report primarily outlines a baseline for each Landscape Character Type (LCT) followed by a sensitivity assessment of each to commercial forestry. The capacity of each LCT to accommodate commercial forestry is outlined, along with design guidance.

The following table is extracted from the report and is considered the conclusion of the Capacity Study.

Table 20.2: Landscape Sensitivity - Study Findings

ID	LCT Name	Sensitivity	Capacity
LCT 1	Coastal Plain	Very High	None
LCT 2	Coastal Drumlin Farmland	High	Limited
LCT 3	Wooded Lakeside Farmland	High	Limited
LCT 4	Cliffed Uplands and Landslips	Very High	None
LCT 5	Moorland Plateau	Very High	None
LCT 6	Moorland Hills	High	Very limited capacity at higher elevations and on steep sided mountain slopes.
LCT 7	Upland Farmland and Foothills	Medium to High	Yes

ID	LCT Name	Sensitivity	Capacity
LCT 8	Valley Farmland	Low	Yes
LCT 9	Drumlin Farmland	Low	Yes
LCT 10	Major Loughs	N/A	N/A
LCT 11	Drumlin Loughs and Stream Margins	Very High	None
LCT 12	River Floodplain	Very High	None
LCT 13	Low Limestone Outcrops	Very High	None
LCT 14	Drumlin Farmland with Peat Bogs	Low	Yes
LCT 15	Undulating Hill Farmland	Low	Yes
LCT 16	Steep Mountain Peaks	Very High	None
LCT 17	Tabular Hills	Very High	None

Note: Leitrim County Council are presently undertaking a landscape capacity assessment of the ability of the landscape to absorb further commercial forestry plantations. This may be finalised in time to inform the final County Development Plan before it is finalized.

10.6.5 Forestry Policy Framework

Leitrim County Council supports a transition away from the current monoculture coniferous forestry model dependent on clear felling to one that is consistent with climate change, biodiversity, enhances community life and supports the local economy. The Draft Plan aims to support the sustainable growth of forestry as an economic activity and as an effective ~~acknowledges its potential role as a~~ climate mitigation measure whilst affording maximum protection to the rural environment, residential amenity and to the receiving landscape. The Draft Plan will seek to maximise the employment creation potential of timber grown locally and also recognise the importance of the forestry value chain to our local economy. The development of woodchip production from thinnings, for alternative energy provision, will be encouraged as an on-farm scale activity.

The Council also recognises that forests and woodlands can have a significant recreational and amenity value in the local community such as Coillte’s Glenfarne Demesne and Derrycarne forests. While walking is the most popular activity, forest recreation embraces other specialised activities including orienteering, mountain biking, horse riding and fishing. The Council are keen to further exploit opportunities in in this area. In line with Forest Service Guidelines, the Council will support the development of roads, tracks, rides, and purpose-built trail and cycle tracks in selected locations. The Council will also support and encourage the carbon neutral harvesting of forestry.

Equally, the protection of rural communities is also an integral part of the policy framework of this Plan including the protection of agriculture and of farming practices and livelihoods. The introduction of large-scale forestry into an area can have potentially negative impacts on visual, social and environmental grounds and thus must be appropriate in terms of their scale and location.

This Draft Plan cannot seek to remove a statutory entitlement, i.e. exempted development status of afforestation as it is beyond the ability of the a development plan to do so. The Draft Plan can however provide the evidential basis for the Planning Authority to contribute to the forest consent process of the Forest Service through comment on forest consent applications that are referred by the Forest Service to the Council for comment and also give a commitment that the Local Authority intends to



take a more proactive role over the life of the Draft Plan where a proposed forestry plantation is at variance with the policy framework contained therein.

Landscape capacity to accommodate further commercial plantations is a key consideration for Leitrim County Council in deciding whether or where forestry expansion occurs. The Council generally favours deciduous over coniferous planting on the basis that native species of deciduous trees sit more comfortably in the Co. Leitrim landscape and also have more benefits for biodiversity.

The Local Authority position will be informed by the recommendations contained in the Landscape Capacity Study for Commercial Forestry (March 2022) in our responses to all applications for Tree Planting and Tree Felling referred to the Local Authority by the Forest Service.

Responses from Leitrim County Council on Applications Submitted to the Forest Service for Tree Planting Applications

The following stated responses to consent applications to the Forest Service for Tree Planting by the Local Authority is qualified on the basis of such commercial plantations comprising primarily of coniferous plantations although it should not be assumed that no such concerns would arise for an exclusive broadleaf plantation.

In the Landscape Character Types which have been determined as having a very high or high sensitivity to further commercial forestry plantations and no capacity or very limited capacity for further plantations (LCT 1 Coastal Plain, LCT 4 Cluffed Uplands and Landslips, LCT 5 Moorland Plateau, LCT 6 Moorland Hills, LCT 8 Valley Farmland, LCT 11 Drumlin Loughs and Stream Margins, LCT 12 River Floodplain, LCT 13 Low Limestone Outcrops, LCT 16 Steep Mountain Peaks and LCT 17 Tabular Hills refers), the Local Authority will object to all further Tree Planting applications on the basis of potential adverse and cumulative impacts to the sensitive receiving landscape.

In the Landscape Character Types which have been determined as having a 'high' or 'medium to high' sensitivity to further commercial forestry plantations and very limited or limited capacity for further plantations (LCT 2 Coastal Drumlin Farmland and LCT 3 Wooded Lakeside Farmland refers), the Local Authority will object to such applications where the siting of such plantations is recommended for exclusion in Section 4.2.1.3 of the Landscape Capacity Study for Commercial Forestry on the basis of the determinantal impact to the sensitive receiving landscape.

For the remaining Landscape Character Types (LCT 7 Upland Farmland and Foothills, LCT 9 Drumlin Farmland, LCT 14 Drumlin Farmland with Peat Bogs and LCT 15 Undulating Hill Farmland refers) which have been determined as having a medium to low sensitivity to further commercial forestry plantations and capacity for further plantations, the Local Authority will object only to those limited areas therein where the siting of such plantations is recommended for avoidance in Section 4.2.1.3 in the Landscape Capacity Study for Commercial Forestry.

In all instances, regard will be given to the siting and design guidance for each Landscape Character Type which have been determined as having some level of capacity for further commercial plantations. Furthermore, any proposed commercial forestry plantation must not have a detrimental impact on a designated Protected View or Prospect identified in this Draft Plan.

Afforestation should be avoided on lands containing deep peat soils and where the land slope is steep, especially where the latter slopes towards a water body.

AGR POL 4 seeks to identify and protect from inappropriate forms of development areas of High Nature Value agricultural land in the county to include consideration of future climate scenarios and



water quality and availability for agricultural purposes. The impact of forestry plantations on such identified areas of High Nature Value farmlands needs to be carefully considered.

The Council will also give consideration to the designation of North Leitrim, Sliabh an Iarainn and its hinterland as a Landscape Conservation Area in conjunction with **TOUR OBJ 3** which seeks to investigate the feasibility and potential of this area as a National Park/Recreational Area designation. The designation of this area as a Landscape Conservation Area may allow for exempted development to be brought under the control of the Local Authority subject to the prescription of the Minister of such development.

~~In certain Protected Landscapes, it would be the preference of this Local Authority if commercial planting was restricted or prohibited altogether. As such commercial forestry is exempted development, there is frustration within the Local Authority that this express objective cannot be realised.~~

This will be on the following basis:

~~On steep slopes above the 300m contour line, new afforestation will be strongly discouraged in the response of the Local Authority to any application to the Forest Service for tree planting and tree felling and it would be the objective of this Local Authority if the existing area under forestry was reduced, restructured and/or redesigned following clearance. This is considered particularly important around the flanks of Dough, Boleybrack and Sliabh an Iarainn, where forestry is most intrusive.~~

~~Elsewhere, particular attention will be paid to retaining (or restoring) views to the water and valley approaches to the hills. This applies particularly to the following areas:~~

- ~~• around the shores of Lough Melvin, Lough Gill, Lough Allen & the smaller loughs around Ballinamore.~~
- ~~• within the distinctive river corridor landscapes of the Shannon and the Cullies rivers, where open wetland areas and views to the water are key landscape characteristics.~~
- ~~• in Glenaniff, the Scardan and Owennayle valleys on the north and east of the Boleybrack uplands, and the Yellow River valleys north and south of Sliabh an Iarainn.~~

~~New woodland planting may be considered acceptable in:~~

- ~~1. Areas of marginal agricultural land on the fringes of the uplands below the 300m contour. These areas already have a distinctive wooded character, provided by strong hedgerows and natural woodland regeneration. They provide relatively good growing conditions for broadleaves. Such areas occur in all the northern glens and the lower hill slopes below the 300m contour line.~~
- ~~2. The drumlin landscapes of the central and southern lowlands, which have considerable further capacity to accommodate woodland expansion, provided that the underlying topography is not obscured by blanket planting over wide areas.~~
- ~~3. Other areas where there is scope to restore or enhance the landscape's distinctive character. These include abandoned farmland, amenity landscapes, the landscape settings to settlements and areas degraded by urban, industrial or infrastructural development.~~

Areas of Low Capacity:



~~These include the county's mountain and moorland landscapes and steep slopes above and around 300m AOD. These are characteristically open landscapes. New woodlands are highly visible and seldom in keeping with moorlands character. Further afforestation in these areas will be strongly discouraged.~~

Policies

FOR POL 1 ~~To encourage the development of sustainable forestry to a scale and in a manner which maximises its contribution to the economic and social wellbeing of the county, and which is compatible with the protection of the environment including the avoidance of likely significant effects on European Sites (SACs and SPAs)~~ **To seek the sustainable development of the forestry sector in Co. Leitrim and does not detract from, the economic and social wellbeing of the county, and which is compatible with the protection of the environment including the avoidance of likely significant effects on European Sites (SACs and SPAs) and other designated and non- designated habitats and sensitive landscapes**

FOR POL 2 ~~To encourage sustainable forestry development, which is planted, managed and harvested in accordance with national and European law and standards set by the Forest Service, Department of Agriculture, Food and the Marine. Guidelines for landscape, forest harvesting, archaeology, biodiversity and water quality.~~ **To encourage sustainable forestry development, which is established, planted, managed and harvested in accordance with national and European law and standards set by the Forest Service, Department of Agriculture, Food and the Marine. Guidelines for landscape, forest harvesting, archaeology, biodiversity and water quality.**

FOR POL 3 ~~To ensure forestry development is of appropriate scale and character whilst ensuring that the development does not have a negative visual impact on the countryside or cause pollution or degradation to wildlife habitats, natural waters or areas of ecological importance.~~ **To have regard to the recommendations contained in the Landscape Capacity Study for Commercial Forestry (March 2022) which forms Appendix VI to this Draft Plan in informing the responses submitted by the Local Authority to all relevant applications for Tree Planting and Tree Felling licenses to the Forest Service or subsequent appeals to the Forestry Appeals Committee. This will be in line with the content of Section 10.6.5.**

FOR POL 4 ~~To encourage the provision of public access in conjunction with relevant stakeholders to new and existing forests through walking and bridle paths, recreational areas and other similar facilities.~~ **To encourage the provision of public access in conjunction with relevant stakeholders to new and existing forests through walking and bridle paths, recreational areas and other similar facilities.**

~~**FOR POL 5** To reply to referrals from the Forest Service (Department of Agriculture, Food and the Marine) seeking to plant additional land for afforestation on the basis of the guidance provided Section 10.6.5 of the Draft Plan.~~

FOR POL 5 ~~To actively participate in the consenting process by the Forest Service on applications seeking to plant additional land for afforestation or tree felling which mandates replanting in landscapes sensitive to commercial plantations or other environmental grounds to ensure that the policies and objectives contained in this Draft Plan are secured.~~ **To actively participate in the consenting process by the Forest Service on applications seeking to plant additional land for afforestation or tree felling which mandates replanting in landscapes sensitive to commercial plantations or other environmental grounds to ensure that the policies and objectives contained in this Draft Plan are secured.**

Objectives

FOR OBJ 1 ~~To work in conjunction with the relevant key stakeholders to develop and expand suitable industries dependent on the considerable timber resource of the county such as fuel-wood production, sawmills and stake producing facilities.~~ **To work in conjunction with the relevant key stakeholders to develop and expand suitable industries dependent on the considerable timber resource of the county such as fuel-wood production, sawmills and stake producing facilities.**



- FOR OBJ 2** To co-operate with the Forest Service of the Department of Agriculture, Food and the Marine to encourage and promote the preparation and implementation of an Indicative Forest Strategy for the county **consistent with the policy framework of this Draft Plan.**
- FOR OBJ 3** ~~To undertake and adopt a landscape capacity assessment of the county to determine the suitability of landscapes to accommodate further commercial forestry plantations.~~ **To give consideration to the designation of North Leitrim, Sliabh an Iarainn and its hinterland as a Landscape Conservation Area in conjunction with TOUR OBJ 3 which seeks to investigate the feasibility and potential of this area as a National Park/Recreational Area designation.**
- FOR OBJ 4** To actively participate in any Regional Fora established by the North West Regional Assembly to ensure sustainable ~~afforestation~~ **land management of the forested area of** across the region.
- FOR OBJ 5** **To actively make representations to the Department of Agriculture, Food and the Marine in the review of the Irish Forestry regime and the any subsequent development of a new national Forestry Strategy.**

10.6.6 Trees and Hedgerows

Trees, woodlands and hedgerows are an important natural and landscape asset within the county and provide a biodiversity function in the provision of food, habitat and shelter in exposed areas, and also act as pollution filters and carbon sinks. Trees are valuable natural resources that improve the quality of life in our communities and make our neighbourhoods greener and more livable, while providing many other social and ecological benefits. With an increasing need for greener and more sustainable urban communities, there is also a growing awareness of the value of trees in settlements. There are only 2 no. Tree Preservation Orders (TPOs) adopted in the county. The Council will consult with the Department of Agriculture, Food and the Marine advisors regarding its recommendations on Tree Felling Licence applications.

Ash Dieback disease is caused by the *Chalara fraxinea* fungus. The disease causes leaf loss and crown dieback in affected trees, and it can lead to tree death. The disease was first identified in Ireland in a plantation in Co. Leitrim in Autumn 2012 on plants imported from continental Europe. The disease is now prevalent throughout most of the island of Ireland and is likely to cause the death of the majority of the ash trees over the next two decades. The decline poses a risk to landowners and others for both public safety and deterioration of woodland cover and the ecological, social and economic benefits these woodlands provide. Leitrim County Council supports the measures underway by the Department of Agriculture, Food and the Marine, Teagasc and Council for Forest Research and Development in the development of an ash breeding programme identifying and planting species of ash that are tolerant to the disease.

Hedgerows are a characteristic feature of the rural landscape and provide an important habitat for many species and act as a wildlife corridor for small mammals, birds and bat species. The removal of existing roadside boundaries, except to the extent that this is needed for a new entrance and traffic safety purposes, shall be resisted where at all possible. Where disruption is unavoidable the replacement with 'like for like' boundary hedges and trees will be required. Elaborate walls and gates in rural areas will be discouraged. The Council encourages the augmentation of existing hedgerows and stands of trees and the planting of new trees and hedgerows, using native broad leaf species, where possible of local provenance, at the boundaries of new housing developments and around new



housing, to create shelter and help absorb/assimilate the new development into the receiving landscape.

Policies

TREE POL 1 To require the submission of landscape plans, where appropriate, to accompany planning applications for rural development proposals prepared by competent professionals and to promote the use of native trees for boundary treatment and shelter belts.

TREE POL 2 To retain and protect significant stands / lengths of existing trees/hedgerows/woodlands, and seek increased planting of native trees, where appropriate, in new developments.

TREE POL 3 To protect and preserve existing hedgerows in new developments and where their removal is necessary to seek their replacement with new hedgerows of native species and of native provenance indigenous to the area.

Objective

TREE OBJ 1 To consider the use of Tree Preservation Orders for the preservation of any tree, trees or group of trees or woodland of special amenity or environmental value.

TREE OBJ 2 To support the measures being undertaken by the Department of Agriculture, Food and the Marine, Teagasc, Council for Forest Research and Development (COFORD) dealing with the effects of Ash Dieback disease and in the development of an ash breeding programme identifying and planting species of ash that are tolerant to disease.

6.3 Climate Action & Renewable Energy

Submission Ref. Nos. DLCDP-48; DLCDP-66; DLCDP-68; DLCDP-69; DLCDP-70; DLCDP-71; DLCDP-82; DLCDP-99; DLCDP-139; DLCDP-146; DLCDP-169; DLCDP-175; DLCDP-183; and DLCDP-198

A number of submissions have been received in relation to climate action and renewable energy in Co. Leitrim and the provisions afforded in the Draft Plan relating to this theme. Principally, the issues raised in the majority of the submissions on this theme relate to:

- Wind energy development;
- Processes relating to the Draft Renewable Energy Strategy (RES) as presented in Appendix IX of the Draft Plan suite;
- Climate Action Plan 2021 targets
- Potential adverse impacts associated with wind energy development in relation to:
 - biodiversity and designated sites of ecological importance
 - geological/peat stability and potential for landslides/peat slippage
 - residential amenity
 - visual and landscape amenity value
 - Shadow flicker and noise impacts
 - Health impacts

The submissions from FuturEnergy Ireland (Ref. No. DLCDP-66) and Wind Energy Ireland (Ref. No. DLCDP-198) reiterate the targets within the Climate Action Plan 2021, principally the requirement for 80% of our electricity to come from renewable sources by 2030 comprising up to 8,000MW of onshore wind, approximately doubling what is being produced today. The submission emphasises the likelihood of renewable energy ambition levels continuing to increase over the course of the decade, particularly following the announcement of the intention of the EU to drastically accelerate its transition to clean energy thereby in the wake of Russia's invasion of Ukraine.

Both submissions welcome the preparation of the Draft Plan and Draft RES which are considered clear and well-constructed. Notwithstanding, in relation to the sieve analysis approach undertaken in identifying areas which are potentially accessible for wind development, it is contended that wind speed should not be considered a constraint for potential development owing to the advances of turbine technologies to function in areas of lower wind speeds. Similarly, the submissions query the manner in which the various constraints, referenced in Section 3 of the Draft RES, have been employed in the sieve analysis to derive the *Wind Opportunities & Constraints* Map produced in Figure 6.3. The submission also requests and suggests text in Section 6.1.5 *Potential Resource* of the Draft RES clarifying potential for wind energy development on the peripheries of the 'available areas' and near the boundaries. The submissions also contend that there is no need for the Draft RES to state (on page 39) that there "are no areas where new wind turbines would be considered 'acceptable in principle'".

Other submissions (DLCDP-69) express concerns over the intended approach to increase the wind energy operational capacity in the county by 90% in the period up to 2030. Concerns are also expressed in relation to the repowering of older turbines and extensions to existing wind farms owing to increased turbine heights and associated landscape/visual adverse impacts, potential adverse impacts on the tourism sector and the legitimacy of Wind Energy Guidelines, as well as the need to promote the development of microgeneration renewable energy sources in the county and other, less visually obtrusive renewable means such as solar and hydro energy generation.



In addition, concerns are raised in relation to the risk of peat failure or landslides as witnessed at Shass Mountain and separately at Meenbog, Co. Donegal and the safety and environmental damage implications associated with wind farm development of this nature.

Reference is also made in submissions to the absence of any policy provisions relating to offshore wind energy development in Co. Leitrim.

More broader comments in relation to climate action welcome the emphasis on emissions reduction, energy efficiency and climate resilience that forms a key strategic vision of the Draft Plan, with policy CA POL 5, relating to the promotion of community and co-operative led climate action initiatives and projects. Specific policy provisions relating to the banning of fracked gas and the direct, on-site powering of data centre developments are also proposed.

Reference is also made to objective CA OBJ 2 of the Draft Plan to develop a decarbonisation zone in Carrick-on-Shannon, with calls for further zones to be implemented for all towns in the county.

The submission from the north Leitrim Sustainable Energy Community (NLSEC) (Ref. No. DLCDP-139) welcomes the inclusion of policy provisions in support of community owned and micro generation opportunities, referencing the need to set microgeneration targets to contribute to the overall renewable energy target for the county. This submission also references the positive potential contribution of solar energy development in contributing to the overall target also and identifies opportunities for more sustainable building fabric solutions in retrofitting and improving the thermal performance of older housing stock.

The promotion of anaerobic digestion technologies and biogas refinement is also advocated in some submissions received, most notably from the Irish Bioenergy Association (Ref. No. DLCDP-146) which welcomes the Draft Plan's support for the sector and the opportunities provided in the overall bioeconomy sphere.

Chief Executive's Response

Many of the items raised in the submissions on this theme have been addressed in previous responses and associated recommendations provided in reply to Recommendation 10 of the OPR submission above (Section 3.2.7) and the submission from the Department of the Environment, Climate and Communications (DECC) (Section 5.9) and should be read in conjunction with this response.

In response to the items raised in the submissions regarding the use of wind speed as a constraint in the sieve mapping analysis to inform the Draft RES, it is acknowledged that dropping the wind speed criteria could provide more opportunity on the boundary of the Available Areas identified – see Figure 6.1 below showing the areas in the county where a Wind speed of 7.5 m/s is viable. Analysis of all the relevant parameters is required to identify a site suitable for wind development.

For the Draft RES wind analysis, a 7.6 m/s lower threshold was employed, to focus on sites more likely to have strategic capacity (turbines with tip height up to 175m). However, it is recommended that further emphasis be provided in the Draft RES highlighting that the sieve mapping and technical analysis in and of itself does not support nor preclude wind energy development. The central aim of the sieve mapping and technical analysis is to highlight areas of the county with the potential to accommodate wind energy development, subject to consideration of landscape/visual constraints amongst other environmental considerations. The corollary also follows that the same analysis highlights areas of the county where prospective wind energy development would be severely constrained by a number of factors. In this regard, greater certainty is provided in identifying areas which are potentially more viable in securing planning permission for wind energy development and

excluded. Watercourses and physical constraints were also excluded using buffer distances related to construction activities and safety. No buffer was applied in relation to cultural heritage sites for the mapping in the Leitrim RES. An erroneous reference to this criterion in Section 3.8.4 of the Draft RES shall be deleted.

In relation to the queries raised in the submissions regarding the potential for wind energy development on the peripheries of the 'Available Areas', as per the responses and recommendation provided to the OPR on this item (see Section 3.7), the methodology utilised in the Draft RES arrives at indicative areas with scope for wind energy development of a strategic scale and capacity to be estimated and does not preclude projects, typically of smaller-scale, from being brought forward in other areas including land adjacent to 'Available Areas', subject to other project-specific environmental considerations and assessments.

In relation to the suggested omission of the sentence: *"There are no areas where new wind turbines would be considered 'acceptable in principle'"* from the Draft RES, it should be noted that the overall wind energy development strategy for the county is informed by two distinct but mutually supporting documents in the form of the 'Draft Leitrim County Renewable Energy Strategy' and the 'Landscape and Visual Capacity Study for Wind Farms and Wind Turbines'. The referenced sentence effectively distils the outcomes of these two distinct assessments, thereby providing the necessary clarity for the reader without resorting to cross examination of the two documents to determine if there are areas of the county where wind energy development is 'acceptable in principle'. In the interests of clarity, it is considered that this sentence is appropriate.

In response to concerns expressed in the submissions relating to potential adverse impacts from wind energy developments, such as landscape/visual impacts, geotechnical impacts such as soils stability (e.g. peat slippage referenced in the case of Meenbog in Co. Donegal and Shass Mountain), economic and tourism impacts, ecological and other environmental impacts, the assessment of such factors is informed at individual project-level, typically in the form an Environmental Impact Assessment (EIA) and Natura Impact Assessment (NIA) where such projects have the potential to give rise to adverse impacts on designated European sites.

The Planning Authority notes and appreciates the concerns expressed in this regard, however, the purpose of the Draft Plan and Draft RES is to provide a high-level strategic policy guidance to inform potential wind energy development in the county having regard to national and regional policy and guidance on this theme. The assessment of the level of conformity of potential wind energy developments with this policy framework and the aforementioned environmental and ecological considerations is conducted at the project-specific, planning application stage.

It should be noted that the sieve mapping and technical analysis undertaken in the Draft RES also carried out a further technical mapping exercise to examine risk factors within the identified Available Areas, presented as Figure 12.4 in the Draft Plan Volume I Written Statement (and Figure 6-4 in the Draft RES). This map identifies risk levels (5 for High, 3 for medium and 1 for Low) at certain distances from material assets, sensitive receptors, European Sites and from natural physical attributes (such as groundwater vulnerability, geological heritage sites, soil drainage, landslide and flooding susceptibility). The risk levels are aggregated and displayed on a scale ranging from High (maximum risk) to Low (minimum risk).

In response to the calls for policy support for microgeneration, Section 12.6.6 of the Draft Plan contains a number of policy provisions in support of micro energy generation, with Sections 12.6.3 and 12.6.5 providing sufficient policy coverage in support of solar and micro hydroelectrical energy generation.



In relation to the referenced absence of policy provision relating to off-shore wind energy developments, this policy area is beyond the scope of the Development Plan. The planning consent mechanism for such projects is through a separate system known as the Maritime Area Consent (MAC) to be assessed by the Minister for the Environment, Climate and Communications. Where a project is granted a MAC by the Minister, it is required to apply for all of the requisite consents and planning permission and will be subject to the full assessment procedures by An Bord Pleanála.

In relation to the comments regarding the banning of fracked gas, this is addressed in Section 6.10 of this report.

Regarding the inclusion of specific policy provisions requiring the on-site powering of data centre developments, this is beyond the remit of the Planning Authority, however, as referenced previously the Draft Plan contains a number of policy provisions in support of microgeneration.

Regarding the suggested implementation of decarbonisation zones for other towns across the county, the Climate Action Plan 2019 required the identification of one decarbonisation zone for each Local Authority in accordance with a specific working definition for a decarbonising zone. In this regard, it was considered that Carrick-on-Shannon was best placed in the county, owing to its scale and concentration of carbon output to facilitate this role. Should the rollout of further decarbonisation zones be implemented by Government, the Council will investigate other candidate locations accordingly.

Chief Executive's Recommendation

Recommendation No. 114:

Delete Section 3.8.4 *Cultural Heritage* from Appendix IX – Part A – *Draft County Leitrim Renewable Energy Strategy* as follows and renumber subsequent sections as appropriate:

3.8.4 Cultural Heritage

~~Renewable energy developments should avoid adversely impacting the cultural heritage in the county. The architectural and archaeological protected structures, sites and areas within Leitrim have been identified and mapped. The National Monuments Act established a list of Recorded Monuments and Places (RMP) that are of historical and archaeological significance. These sites are scattered throughout the county, with higher concentrations in the larger urban areas. A number of buildings in Leitrim are included in the Register of Protected Structures (RPS) as being of special interest for historical, artistic or other cultural reasons. Buildings constructed after 1700 are included in the National Inventory of Architectural Heritage (NIAH). In all cases, consent must be obtained to carry out works on or near these sites and limitations may apply to the extent of retrofit possible for protected structures.~~

~~Development within townlands may be constrained by designated Architectural Conservation Areas (ACAs) and the Zone of Architectural Potential surrounding recorded monuments. Where necessary, an Archaeological Assessment can be undertaken to determine the type and extent of impacts of a development on protected structures or monuments. The aim is to harness the renewable energy potential of the area while preserving the architectural and archaeological heritage.~~

6.4 Carrick Library

Submission Ref. Nos. DLCDP-17; DLCDP-21; DLCDP-25; DLCDP-27; DLCDP-28; DLCDP-29; DLCDP-30; DLCDP-32; DLCDP-38; DLCDP-58; DLCDP-59; DLCDP-60; DLCDP-65; DLCDP-72 and DLCDP-122

A number of submissions have been received in relation to the provision of library services in Carrick-on-Shannon, principally seeking an expansion to the range of library services currently on offer at the branch library building located on Priest's Lane, Carrick-on-Shannon. In this regard, a frequent item raised in the submissions is the need to secure an objective within the Plan seeking the expansion of the existing library site or acquiring a site for the development of new library facilities.

Related to this theme is a submission from the Libraries Development Unit of the Department of Rural and Community Development (DLCDP-17) which references the County and City Management Association (CCMA) and the Local Government Management Agency (LGMA) joint public library strategy, *'Our Public Libraries 2022'*, which recognises that renewed investment in the development of library buildings, technology and other equipment is essential for libraries to deliver quality services.

Chief Executive's Response:

Section 7.8.6 of the Draft Plan addresses the item of library services within the county and refers to the aforementioned CCMA and LGMA strategy and the Leitrim Library Services Development Plan, a five year plan which aims to meet the demands of the evolving economic and community profile of the county.

The Draft Plan provides policy support in the form of objective LIB OBJ 1 which seeks to *"support the further development and enhancement of the library service in Co. Leitrim and the implementation of actions set out in the Library Development Plan, when completed, subject to funding being available"*.

In relation to the specific issue of the Carrick-on-Shannon library, the Council acknowledges that the provision of improved library services in the town has been a longstanding issue. However, the primary function of the County Development Plan is to provide strategic direction on the future sustainable development of the county, with policy support to those areas which can contribute to this. In this regard, it is considered that objective LIB OBJ 1 provides sufficient support in relation to the future development of library services.

The forthcoming Carrick-on-Shannon LAP will provide for additional policy support for the enhancement of library services in the town, including the identification and appropriate land use zoning objective of a potential new site of the provision of library services should such a location emerge over the LAP preparation process.

Chief Executive's Recommendation

No change to the Draft Plan.

6.5 Gold Mining

Submission Ref. Nos. DLCDP-76; DLCDP-77; DLCDP-78; DLCDP-79; DLCDP-81; DLCDP-85; DLCDP-87; DLCDP-88; DLCDP-89; DLCDP-90; DLCDP-91; DLCDP-92; DLCDP-93; DLCDP-94; DLCDP-95; DLCDP-96; DLCDP-97; DLCDP-98; DLCDP-99; DLCDP-100; DLCDP-101; DLCDP-102; DLCDP-103; DLCDP-104; DLCDP-106; DLCDP-107; DLCDP-108; DLCDP-109; DLCDP-110; DLCDP-111; DLCDP-112; DLCDP-113; DLCDP-114; DLCDP-116; DLCDP-117; DLCDP-118; DLCDP-119; DLCDP-120; DLCDP-121; DLCDP-123; DLCDP-124; DLCDP-125; DLCDP-126; DLCDP-127; DLCDP-129; DLCDP-132; DLCDP-133; DLCDP-134; DLCDP-136; DLCDP-137; DLCDP-138; DLCDP-140; DLCDP-142; DLCDP-144; DLCDP-147; DLCDP-148; DLCDP-149; DLCDP-150; DLCDP-152; DLCDP-153; DLCDP-154; DLCDP-155; DLCDP-156; DLCDP-158; DLCDP-159; DLCDP-160; DLCDP-161; DLCDP-162; DLCDP-163; DLCDP-164; DLCDP-165; DLCDP-166; DLCDP-167; DLCDP-168; DLCDP-171; DLCDP-172; DLCDP-174; DLCDP-176; DLCDP-177; DLCDP-178; DLCDP-179; DLCDP-182; DLCDP-184; DLCDP-185; DLCDP-186; DLCDP-187; DLCDP-190; DLCDP-191; DLCDP-193; DLCDP-195; DLCDP-201; DLCDP-203; DLCDP-204; DLCDP-206; DLCDP-207; and DLCDP-208

A number of submissions have been received in relation to gold mining and the granting of prospective licenses in Co. Leitrim.

Recurring issues cited in the submissions are the potential adverse impacts arising from mining practices in the county and the potential impact on water quality, landscape, agriculture, tourism, and biodiversity amongst others.

Chief Executive's Response:

The practice of gold mining would be classed as an extractive industry and the policies and objectives relating to this type of development is outlined in Section 10.7, *Extractive Industry and Building Materials Production* of the Draft Plan. While the role of extractive industries is facilitated, it is also recognised that extractive industries can give rise to detrimental environmental and residential amenity impacts, including traffic congestion, dust, noise/vibration, water pollution, visual intrusion and the effects on local road networks may also be significant. The Council seeks to ensure that the extractive industry follows an environmental code of practice, in order to minimise potential adverse impacts on the environment and on local communities.

In considering proposals for such developments, the Council will have regard to the protection of residential amenity and natural resources, the prevention of pollution and the safeguarding of aquifers and groundwater. The development of new extraction locations will be strictly controlled in areas of high landscape value, in European designated sites, Natural Heritage Areas (NHAs), Nature Reserves or other areas of importance for the conservation of flora and fauna, or in areas of significant archaeological potential. Section 13.18.2 of the Draft Plan sets out Development Management Standards applicable to proposals relating to the extractive industry. These can be further supplemented to ensure that any proposal will not have a detrimental impact on the environment and natural landscape of the county.

The issue of prospecting licences has been raised in a number of the submission received. A prospecting licence is a permit, issued by the Minister for Communications, Climate Action and Environment, which allows the holder to prospect for specified minerals in a defined geographic area. By holding such a license, the licensee may prospect for minerals using different techniques, such as examining of historical and geological records (desk studies), surveying the land, the examination of rocks (geological studies), collecting small samples of rocks, soil or sediments for analysis (geochemical



surveys), or measuring certain properties of the rocks in the area, for example their magnetic properties (geophysical surveying). It is important to note that a prospecting licence relates to the activity of exploring for minerals only and does not give the licence holder permission to mine or excavate material. The granting of such licenses is regulated by the Minerals Development Acts 1940 to 1999 and as such is not within the scope of the Planning and Development Act 2000 (as amended) and is outside the remit of a County Development Plan.

Should minerals be discovered during prospecting, there are three separate licences / consents that are required to allow mining to occur.

1. An integrated pollution control (IPC) licence from the Environmental Protection Agency (EPA). IPC licences aim to prevent or reduce emissions to air, water and land, reduce waste and use energy/resources efficiently. An IPC licence is a single integrated licence which covers all emissions from the facility and its environmental management.
2. Planning permission from the Local Authority (including a full environmental impact assessment).
3. A mining lease or licence from the Minister for Communications, Climate Action and Environment.

The policy framework contained in the Draft Plan only becomes of relevance if a planning application is lodged to the Planning Authority.

Chief Executive's Recommendation

Recommendation No. 115:

Include the following additional policy objective in Volume I, Chapter 10 (Rural Development):

AGG RES POL 8: To ensure that the extraction of minerals and aggregates protects to the maximum practicable extent the visual quality of the receiving landscape and do not adversely affect the environment or adjoining existing land uses.

Recommendation No. 116:

Amend the Development Management Standards text relating to Extractive Industries (Volume I, Chapter 13, Section 13.18.2 (Extractive Industries), as follows:

The Planning Authority will not facilitate the development of the extractive industry and permit such workings unless it has been shown that the following criteria can be met; having taken into account the reduced demand for aggregates that will come about through improved recycling of construction and demolition waste:

- The environment and the landscape will be safeguarded to the greatest possible extent during all life cycle stages of the process,
- Such operations have good access to, or are within reasonable distance of, the national or regional road network and do not adversely affect the residential or tourism amenity of the area,
- Satisfactory provision will be made for a beneficial after use of the land that does not conflict with other planning objectives for the area,
- The working, landscaping, restoration and after care of the site will be carried out to the highest standards in accordance with the approved scheme.

The development, continuation of use or diversification of activities relating to the extractive industry will be assessed having regard to the 'Quarrying and Ancillary Activities Guidelines' (DoEHLG, 2004)



(or any superseding national policy document), 'Guidelines for Environmental Management in the Extractive Industry' (EPA, 2006), 'Guidance on Biodiversity in the Extractive Industry' (NPWS), 'Geological Heritage Guidelines for the Extractive Industry' (GSI, 2008), the Archaeological Code of Practice (2009) and the Irish Concrete Federation Environmental Code (2005) and any other relevant superseding policy guidance.

Applicants should submit the following information at application stage:

- Map showing total site area, highlighting area to be excavated, and any ancillary proposed development, nearest dwellings, or any other development (within 1 km of the site)
- Description of the aggregate(s) to be extracted, method of extraction, any ancillary processes (such as crushing, concrete manufacture, etc.), equipment to be used, stockpiles, storage of soil and overburden, storage of waste materials and proposed/existing settling ponds
- Total and annual tonnage of extracted aggregates, expected life of the extraction, maximum extent and depth of working and proposed phasing programme
- Description of development works (buildings, fixed and mobile plant, roads, fuel tanks, water supply and drainage, earth mounds, etc.)
- Description of water courses and water table depth, natural and cultural heritage, traffic impact and waste management
- Description of cumulative impact when taken together with other quarries in the vicinity
- Likely environmental effects including the preparation of an Environmental Impact Assessment Report where relevant
- Proposed mitigation measures
- Phased restoration and after-care proposals, and
- Proposals for surface water management and flood risk minimisation.

Where proposals for the working out of minerals and aggregates are submitted in the *Area of Outstanding Natural Beauty (AONB)* or an *Area of High Visual Amenity (AHVA)*, existing landscape quality shall remain the overriding priority and such proposals must illustrate that the benefits of the development will outweigh any adverse environmental consequences. The Planning Authority shall evaluate the need to conserve the environment, character and natural beauty of AONBs and AHVAs and the extent to which the proposed development would materially damage these qualities. It shall also examine the national need for that specific mineral or aggregate substance to be worked and the availability of the resource in less sensitive locations.

The Council may require the submission of an EIAR for sub-threshold development where it is considered that the development would be likely to have significant effects on the environment. The restoration of disused pits and quarries to productive agricultural use will be encouraged where appropriate having regard to all appropriate environmental considerations. Other possible post closure uses may be considered such as recreational facilities and natural habitat areas.

A condition requiring the lodgement of a financial bond will be included in any grant of permission to ensure the satisfactory reinstatement of the site following the completion of extraction. A Special Development Contribution in accordance with Section 48 of the Planning and Development Act, 2000 (as amended), may be imposed for the upgrade or maintenance of the local road network to facilitate the proposed development.

6.6 Core and Settlements Strategies

Submission Ref. Nos. DLCDP-22; DLCDP-67; DLCDP-82; DLCDP-99; DLCDP-157; and DLCDP-183

A number of submissions have been received in relation to the core and settlement strategies presented in the Draft Plan. Principally, the issues raised in the submissions on this theme relate to:

- Support of policies to re-occupy or re-establish vacant dwellings in towns and villages as a sustainable solution to the issue of rural depopulation.
- More focus on enhanced growth for north Leitrim, capitalizing on the strategic location of Manorhamilton in close proximity to Sligo and Enniskillen and the strong network of towns and villages in the locality.
- More positive emphasis on the growth of Kinlough and Dromahair and their relationships to larger settlements of Bundoran and Sligo Town respectively.
- Perceived shortage of housing allocated for the county over the Plan period, with concern expressed that the rezoning of serviced lands will impact on the delivery of housing.
- Support for the development of serviced sites in Graig settlements as an alternative to one-off rural housing.
- Concerns expressed that the Plan's housing policy is underpinned by out of date data which is then extrapolated into zoning allocation for each settlement.

Chief Executive's Response

The Planning Authority welcomes the comments made in the submissions in support of the policy framework contained in the Draft Plan aimed at the regeneration and re-occupation of vacant housing and the re-vitalisation of our towns and villages. The comments in support of the policy provisions promoting the development of serviced sites in 'Graig' settlements as an alternative to one-off housing are also welcomed.

The Council recognises the strategic importance of Manorhamilton as the key settlement in the north Leitrim and the many attributes the town has in terms of an economic and employment base, education provision, social and community infrastructure, physical infrastructure and its strategic location in proximity to larger urban centres such as Sligo and Enniskillen. As the second largest settlement within the county and with its geographical location at the heart of north Leitrim, there is significant opportunity for Manorhamilton to act as the catalyst for growth in this northern part of the county and the network of towns and villages in the locality. The Draft Plan recognises the importance of the north Leitrim network of towns and villages, with Manorhamilton designated as a Tier 2A settlement and Dromahair and Kinlough featuring as Tier 2B settlements in the Settlement Hierarchy of the Draft Plan.

As referenced in Section 2.5 *Housing Supply Targets* of the Draft Plan, the overall housing supply target for the county over the Plan period is provided by the Department of Housing, Local Government and Heritage (DHLGH) in its Section 28 guidance, *Housing Supply Target Methodology for Development Planning – Guidelines for Planning Authorities* (2020). This sets out the methodology employed, using projected household demand figures established by the Economic and Social Research Institute (ESRI), when deriving the projected housing target allocation for the county over the Plan period. This process, which is a mandatory function to be completed by the Planning Authority, derived a housing supply target of 1,208 additional residential units for the county over the Plan period.

The growth envisaged for all settlements in the county, including those in north Leitrim, in the Draft Plan is commensurate with the capacities of the respective settlements to accommodate additional



growth having regard to a number of factors such as infrastructural capacities, range of services and functions supported in the settlements, historical growth patterns, levels of construction activity and position of respective settlements in the overall Settlement Hierarchy of the Plan.

Notwithstanding the depressed levels of construction activity in recent years, there are compelling policy arguments as the second largest settlement in the county for increasing the level of housing targeted for Manorhamilton over the Plan period having regard to its historical population increase over the last twenty years and the substantial margin of its population (1,466 in 2016) difference from the third most populous settlement in the county (Kinlough – 1,032 in 2016). The preliminary results from the 2022 Census of Population have seen a population increase of 9.5% in the county from 2016 to 2022, and whilst official figures at settlement level are not available at present, it is anticipated that similar levels of population increase will be seen in the larger settlements of the county.

The emerging demographic profile may provide the requisite evidence basis for a comprehensive review of population and housing targets within the county over the Plan period. The statutory requirement on the Planning Authority, under Section 15 of the Act, to prepare a report for the Elected Members on the progress achieved in securing the objectives of the Plan not more than two years after its adoption, can provide the mechanism for such a review and an opportunity to petition the Department in increasing the population and housing targets for the county for the remainder of the Plan period.

In response to the request for a more positive emphasis on the growth of Kinlough and Dromahair and their relationships to the larger settlements of Bundoran and Sligo Town respectively, the Draft Plan seeks to emphasise the importance of creating settlements that can sustain their respective communities and have a strong economic function without giving rise to an unhealthy or unsustainable reliance on other, larger settlements and increasingly dependent on commuting by private car.

Whilst it is acknowledged that some settlements are reliant on larger urban areas for the provision of services and functions such as retail, education provisions or healthcare, strong economic functions are key to self-sustain settlements and help to create more vibrant communities and combat against the dormitory nature of settlements with high economic and employment reliance elsewhere. In respect of Dromahair and Kinlough there are concerns, borne out by statistical evidence in respect of commuting patterns, that these settlements are particularly reliant on larger urban centres such as Sligo and Bundoran to the detriment of their own self-sustaining capacities.

In the case of Dromahair and Kinlough, the Draft Plan merely highlights where an unsustainable over-reliance on larger settlements such as Sligo and Bundoran can emerge and sets out a policy framework aimed at reversing this with a focus on developing more self-sustaining settlements that foster more vibrant communities with strong economic functions.

In response to the concerns raised regarding the perceived shortage of housing allocated for the county over the Plan period and the associated concerns over the extent of zoning, the rationale for housing allocation is provided in Chapter 2 *Core Strategy* of the Draft Plan and reiterated in this response also. The zoning of lands accords with the yield required to accommodate the housing supply allocations as provided in the *National Planning Framework Implementation Roadmap* and the *Housing Supply Target Methodology for Development Planning: Guidelines for Planning*. Notwithstanding, as addressed in Section 7 of this report, the public consultation phase has seen a number of additional lands submitted by landowners / developers for consideration by the Planning Authority in a number of settlements across the county. In this regard, the Planning Authority has examined the individual merits of these submitted lands and have undertaken an infrastructural



assessment and land use evaluation of all such submissions. Following this process, additional lands have been recommended for inclusion in the Plan with residential land use zoning objectives to facilitate further residential development. In recommending the inclusion of additional lands in this regard, the Planning Authority has sought to provide sufficient flexibility and market choice to enable the Planning Authority to secure its statutory obligations by ensuring that sufficient and suitable land is zoned for residential use, or for a mixture of residential and other uses, to meet the requirements of the Housing Strategy and to ensure that a scarcity of such land does not occur at any time during the Plan period. This approach is also in line with that advocated in Department of Environment, Heritage and Local Government *Guidance Note on Core Strategies* (2010), where consideration of market choice is a requirement in relation to the quantum, location and phasing of development. It is also considered that such scope is provided for under the 'Development Plan Guidelines for Planning Authorities' (June 2022) in Section 4.4.3 'Ensuring Sufficient Provision of Housing Lands/Sites'. The yield of all such additional sites have been included in the revised Table 2.6 of the Core Strategy.

Accordingly, it is recommended that Table 2.6 *Yield of available lands zoned for Residential or Mixed Use in Draft Leitrim County Development Plan 2023-2029* of the Draft Plan is amended to reflect the recommended inclusions of lands zoned for residential use addressed in Section 7 of this report. It is not considered that the scale of such additional lands requires a reconsideration of the individual allocation to towns, villages and rural areas but has been clearly captured within the revised Table 2.6.

Chief Executive's Recommendation

Recommendation No. 117

Amend Table 2.6 (overleaf) as follows:

Urban Centre	Household Allocation 2022-2028	% Allocation	A. New Residential (ha)	B. New Residential (Low Density/Infill) (ha)	C. Mixed Use (ha)	Yield A	Yield B	Yield C	Total Household Yield	
Tier 1						15-30 units/ha	10 units/ha	20 units/ha		
Key Town	Carrick-on-Shannon ^A	362	30	TBD	TBD	TBD	TBD	TBD	362	
Tier 2A						20 units/ha	10 units/ha	15 units/ha		
Sub Regional Growth Centres	Ballinamore	97	8	2.62	2.67	2.24	52	27	34	113
	Manorhamilton	97	8	3.46	2.99 6.14	0	69	30 61	0	99 130
Tier 2B						15 units/ha	10 units/ha	15 units/ha		
Support Towns	Dromahair ^B	48	4	2.71	0.3	0	41	3	0	44
	Drumshanbo	48	4	2.81	2.37 3.29	0	42	5 14	0	47 56
	Mohill ^C	48	4	0	1.07	4.49	0	11	67	78
	Kinlough	Kinlough	48	4	2.54	1.15	0.3	38 63	12	5
Tier 3										
Key Villages	Carrigallen	36	3	2.33	0.15	0.2	35	3	3	41
	Dromod	24	2	2.09 3.56	0	0	31 53	0	0	31 53
	Drumkeeran	36	3	2.05	0.49	0.8	31	5	12	48
	Drumsna ^D	24	2	1.05	0.08	0	16	2	0	18
	Leitrim	24	2	1.47 2.05	0.44	0	22 31	4	0	26 35
Tullaghan ^E	24	2	0	3	1.035	0	12	16	28	
Sub Total			22.9	15.05	8.03	388	134	642	38	
Tier 4 Villages	15 No.	86	7						85	
Tier 5 Graigs	25 No.	61	5						60	
Other	Rural Houses ^F	145	12						144	
Total		1,208	100						1,319 1,415	



6.7 Housing

Submission Ref. Nos. DLCDP-24; DLCDP-67; DLCDP-82; DLCDP-157; DLCDP-173; DLCDP-183; and DLCDP-199

A number of submissions have been received in relation to the housing provisions contained within the Draft Plan, with the following issues raised in the submissions relating to this theme:

- Draft policy in relation to replacement houses (Section 3.17.5 of the Draft Plan) considered to be overly restrictive where such developments “*shall only be considered by the Planning Authority where the replacement house is contained within the curtilage of the previous house it is seeking to replace*”, with a proposed amendment to this policy to consider such applications on a case-by-case basis by omitting the word “only” from the referenced text of Section 3.17.5.
- Support of policies to re-occupy or re-establish vacant dwellings in towns and villages as a sustainable solution to the issue of rural depopulation.
- Reference to high levels of vacancy properties still within the county with a request for an objective to identify, acquire and refurbish such properties and amend the list of vacant but habitable properties by 2023.
- Reference to the use of pre-fabricated timber housing as a means to increase housing provisions with a query as to whether there is a Plan objective to locate such a plant in Leitrim.
- Request for social housing development on publicly owned lands in Kiltyclogher, with Leitrim County Council requested to purchase such lands for the provision of social housing.
- More policy support for developers building private houses.
- Development charges for on-off rural housing should not be increased.
- There should be no difference considered between full-time or part time farmers or their family when seeking planning permission to build a house on their landholding in line with normal planning requirements.
- Landowners should retain the right to sell a site should they need/want to and request that more consultation take place between the Planning Authority and prospective applicants prior to any application for planning permission.
- County Development Plan can act as a catalyst for the Council to lead in implementing the principles of universal design in housing and the importance of new housing to be ‘*lifetime housing*’ to minimise the cost of adaptation works as the current Building Regulations do not provide for this.
- A series of recommendations relating to Traveller accommodation provisions including specific accommodation requirements under the Planning and Development Act 2000, as amended, the provisions of the Traveller Accommodation Programme, a system of monitoring and reviewing the provisions outlined in the Plan as they relate to Traveller accommodation, consultation with local Traveller organisations and with the Local Traveller Accommodation Consultative Committee and eliminating energy poverty in Traveller specific accommodation.

Chief Executive's Response

The Planning Authority welcomes the comments made in the submissions in support of the policy framework contained in the Draft Plan aimed at the regeneration and re-occupation of vacant housing in our towns and villages and as a sustainable solution to the issues of rural depopulation.

In response to the submission concerning Section 3.17.5 *Replacement Houses* of the Draft Plan, it should be noted that the reference to ‘*curtilage*’ does not mean that any prospective replacement dwelling is restricted to the footprint of the dwelling such a development seeks to replace, but rather



any immediate areas ancillary to the function of the original house including gardens, paths, driveways, yards, garages or sheds. Curtilage does not, however, extend to areas not ancillary to the function of the subject house, for example agricultural sheds or yards used for farming purposes.

A key consideration in the assessment of any application for replacement houses is the degree of compliance such proposals have in relation to the required standards for wastewater disposal, principally conformity with the EPA Code of Practice *Code of Practice for Domestic Waste Water Treatment Systems (Population Equivalent ≤ 10) (2021)*. The Code of Practice sets out key site considerations to be achieved in the selection, installation and maintenance of domestic wastewater treatment systems (DWWTS), including minimum separation distances to a range of features including distances to watercourses, domestic wells, neighbouring dwellings and any on-site dwelling amongst other features. Such minimum separation distances and standards seek to guard against an over-intensification of on-site wastewater treatment systems that may give rise to potential adverse impacts on human and public health and water quality.

There is a derogation for domestic wastewater treatment systems (DWWTSs) contained within the new EPA Code of Practice (Section 1.3 Variances for Existing Systems, Sensitive Areas and New Technologies) similar to Section 6.6 of the previous iteration.

Existing DWWTSs may not meet the performance requirements as set out in this CoP. If existing DWWTSs are being upgraded, variances to the requirements set out within this CoP may be considered by the local authority where the authority is satisfied that the proposed upgrade will protect human health and the environment.

The reference to curtilage in the Draft Plan is to ensure that the proposed development seeks to replace an existing system serving a house on the same site. If the site proposed is not the same site which contains the existing house, the replacement house would be required to satisfy the soil percolation characteristics of the Code of Practice. The Planning Authority have recently had to defend a complaint lodged with the Office of the Planning Regulator on this issue last year which resulted in an investigation to our assessment criteria for replacement houses.

It is noted that a more general interpretation is provided part (b) of draft policy RUR SET POL 10 which states the following in relation to proposals replacing a habitable dwelling other than a vernacular dwelling:

*“b) The proposed replacement house shall **generally** be within the same curtilage of the existing house and the design of the replacement house shall be of a high standard whose scale and character is appropriate to the site, to existing development in the vicinity of the site and to the rural area generally” (emphasis added).*

Notwithstanding, it is considered that a more explicit reference to the definition of curtilage is warranted in relation to replacement houses in rural areas. Similarly, it is considered that a clearer policy distinction between restoration/refurbishment of vernacular rural dwellings and replacement dwellings should be incorporated into the Plan.

In response to the comments in the submissions concerning the levels of vacant properties within the county, it is recognised that there remains a substantial number of vacant and derelict properties throughout the county. Section 3.8 *Vacant and Unfinished Housing* of the Draft Plan outlines the significant progress made in managing and coordinating the completion of unfinished housing developments in the county. The Council will continue to work proactively with residents, developers and all relevant stakeholders to secure satisfactory completion.



The recently published preliminary 2022 Census of Population data shows a significant reduction in the level of vacancy rates across the county. Notwithstanding this reduction, the Council acknowledges the need to further reduce the number of vacant homes throughout the county. The Council has appointed a full time Vacant Homes Officer who will actively monitor and assess vacancy locally using CSO / Geo Directory data, vacanthomes.ie, etc. and building local vacancy knowledge through site inspections, surveys, etc.. The Vacant Homes Officer will support the implementation of current and any emerging initiatives from the Department of Housing, Local Government and Heritage. The Officer will provide an advisory role to Local Authority teams and is available to provide advice to members of the public on vacant homes/properties to assist, inform, provide and promote up to date advice on bringing vacant property back into use including across the suite of schemes available at national level.

The overarching principle of compact growth, which is manifest in a number of policies and objectives contained in Chapter 3 *Housing* and Chapter 6 *Urban Settlements* seeks the re-use and regeneration of under-utilised and vacant sites and properties in our settlements. This approach, together with a range of active land management measures outlined in the Draft Plan will seek to further erode the levels of vacant properties and promote greater levels of residential occupancy in the county over the Plan period.

In response to the request to provide an objective to identify, acquire and refurbish vacant properties, the Council's Housing Department maintains a Vacant Housing Survey/Register as part of the Council's Vacant Homes Action Plan. This Action Plan sets out ambitious but realistic targets of the number of vacant homes that can ultimately be brought back into use. The issue of reliable data and information pertaining to housing stock and vacancy figures has been a constraining factor, with significant reliance at national level on data derived from the 2016 Census of Population. However, emerging data from the 2022 Census and initiatives at national level, such as the www.vacanthomes.ie website which provides a central portal for individuals to anonymously log possible vacant properties and alert Local Authorities to those properties, will provide for a more robust monitoring of vacancy and improved outputs at local level.

In this regard, preliminary results from the 2022 Census have indicated that the level of vacant dwellings recorded in the county has dropped from 20% (3,589 vacant dwellings) in 2016 to 15.5 % (2,897 vacant dwellings) in 2022. Clearly, there is further work to be done in addressing this issue, however, the policy framework presented in the Draft Plan, in addition to improvements in data capture and increased legislative powers to pursue more active land management measures, provides for a stronger footing for resolving this issue over time.

In relation to the item referencing an objective in the Plan facilitating the development of pre-fabricated timber housing plant, Chapter 4 *Economic Development* outlines the policy framework of the development of a range of economic functions and enterprises, including manufacturing-based sectors such as that identified in the submission. It is not considered necessary to include a specific objective in this regard as it beyond the scope of the Local Authority to realise such an objective.

In relation to the item concerning the provision of social housing in Kiltyclogher, Chapter 3 *Housing* and Appendix V *Draft Leitrim County Housing Strategy* of the Draft Plan, identifies the level of social housing provisions required in the county over the Plan period. This is supported by a Housing Needs Demand Assessment which has been carried out as part of the preparation of the Draft Plan and is supported though the policy framework set out in Chapter 3 of the Draft Plan. Objective HOUS OBJ 2 of the Draft Plan expresses a clear commitment to the delivery of social housing in our county in accordance with the Council's Social Housing Delivery Programme. The provision of social housing in Kiltyclogher and all other settlements will be provided in accordance with the provisions of the Housing Need Demand Assessment and the Housing Delivery Action Plan.



In response to the items raised on rural housing provisions, Section 3.17 *Rural Settlement Strategy* of the Draft Plan sets out the policy framework for the development of rural housing in the county. This policy framework was devised having regard to the provisions contained within the National Planning Framework (NPF) which required a clear distinction to be made between areas under urban influence and elsewhere in providing for the development of rural housing in the countryside (National Policy Objective (NPO) 19 refers). It confirms that the capacity to provide for single rural housing, in areas under urban influence, should be retained for those that have a demonstrable economic or social need to live in the area, subject to all other proper planning and sustainable development considerations. For all other rural areas, the facilitation of single housing proposals should be based on siting and design criteria for rural housing in statutory guidelines and plans, having regard to the viability of smaller towns and rural settlements.

In this regard, policy RUR SET POL 3 seeks to accommodate demand from existing members of the rural community for permanent residential development in designated **Low Capacity Areas** (identified in Map no. 3 in Volume III *Book of Maps* of the Draft Plan suite) *“who have strong links to the area and who are an intrinsic part of the rural community in which planning permission is being sought, subject to normal planning considerations and who satisfy the following criteria:*

- 1. Persons with a demonstrable social need to live in a particular local rural area
Persons who have lived a substantial period of their lives in the local rural area (minimum 18 months) in which the house is proposed.*
- 2. Persons with a demonstrable economic need to live in the particular local rural area – Persons employed full-time in rural-based activity such as farming, horticulture, forestry, bloodstock or other rural-based activity in the area in which they wish to build or whose employment is intrinsically linked to the rural area in which they wish to build, such as teachers in rural schools or other persons who by the nature of their work have a functional need to reside permanently in the rural area close to their place of work, provided that they have never owned a house in a rural area.*

All applicants for one-off rural housing will need to demonstrate compliance with the qualifying criteria of one of the above two categories unless otherwise specified as being located within an area where this Rural Housing Policy does not apply”.

It is accepted that a significant proportion of farming in Leitrim is undertaken on a part time basis or supplemented by an off-farm income⁵. Accordingly, it is considered appropriate to amend the applicant criteria for those with a demonstrable economic need to reside in a particular rural area designated as a ‘Low Capacity Area’ to include a reference to applicants involved in part-time occupations in farming or natural resources related activities where such occupations are the predominant occupation.

In relation to the issue of development charges for one-off rural housing not being increased, this item is beyond the scope of the Plan and more relevant to the Development Contribution Scheme. This is a separate reserved function of the Elected Members. A draft Development Contribution Scheme 2026-2029. It will be placed on public display in September following a presentation with the Members.

Regarding the issue that landowners should retain the right to sell a site should they need/want to, the Planning Authority have no function in this regard. However, policy RUR SET POL 5 of the Draft Plan establishes that in areas where significant levels of rural housing development have taken place on the edges of urban areas within the county and where the Council considers such areas are

⁵ *‘The Farming Sector in Ireland: A Profile from Revenue Data’*, Revenue (2020)



becoming over developed, the Council at its discretion may seek agreement under Section 47 of the Planning Act (sterilisation agreement restricting further development from the landholding for an agreed period) if it considers it necessary to regulate further development in this area. The provisions of this draft policy seek to safeguard areas against speculative, urban-generated housing in rural areas and is deemed appropriate.

Moreover, the Draft Plan, under Section 13.2.1 encourages pre-planning consultations prior to the making of any formal planning application in accordance with Section 247 of the Planning and Development Act 2000 (as amended). Such consultations can identify any such areas of concerns regarding any prospective application at an early stage. There is compulsion however on applicants to engage in pre application consultations which are not intended to proffer advice on the suitability of design or such matters. Their purpose is to outline the policy considerations in the Development Plan against which the proposal will be assessed against.

In relation to the item concerning the promotion of the principles of universal design in housing and the concept of 'lifetime housing', Chapter 3 *Housing* makes a number of references promoting the incorporation of the principle of universal design into new residential properties. Policies HOUS POL 3 – HOUS POL 10 set out the policy framework for promoting such standards and facilitating the provision of independent and/or assisted living accommodation, including the adaptation of existing properties to meet the housing requirements for all ages and abilities. Moreover, policies OP POL 1 and PD POL 1 of the Draft Plan reiterate the need to promote Universal Design and Lifetime Housing in all development proposals in accordance with best practice and the policies and principles contained in *Building for Everyone: A Universal Design Approach* (National Disability Authority, 2012) and *Sustainable Residential Development in Urban Areas* and its companion document *Urban Design Manual: A Best Practice Guide* (DEHLG, 2008), *Age Friendly Principles and Guidelines for the Planning Authority, Age Friendly Ireland, 2021* and '*Access for the Disabled*' (No. 1 to 3)(National Rehabilitation Board).

Regarding the items raised in relation to the provision of Traveller accommodation, Section 3.11 of the Draft Plan addresses the accommodation provisions in relation members of the Travelling Community, with objective HOUS OBJ 6 of the Draft Plan seeking to secure the implementation of the Council's Traveller Accommodation Programme 2019-2024 and any subsequent programme adopted during the Plan period. Further reference to the needs of the Travelling Community have been incorporated into the *Draft Leitrim County Housing Strategy* in Appendix V of the Draft Plan suite.

In relation to the issue raised in the submissions pertaining to the elimination of energy poverty in Traveller-specific accommodation, policy EE POL 4 seeks to "*support the implementation of national energy efficiency standards and to support and facilitate energy conservation and efficiency, including through improved building design; promoting Smarter travel; and, raising awareness/benefits of energy conservation*". Energy efficiency that is specific to traveller accommodation may as appropriate be addressed as part of the review/update of the Traveller Accommodation Programme 2019-2024.

Chief Executive's Recommendation

Recommendation No. 118

Amend Section 3.17.5 as follows:

3.17.5 Restoration of Vernacular Dwellings and Replacement Houses in Rural Areas

Over the course of the previous County Development Plan, there is **was** a growing tendency to replace established rural dwellings rather than seeking to upgrade or modernise them. **Vernacular dwellings in the countryside reflect local traditional building forms and types and such structures contribute to the distinctive local character and built heritage of the county. Retaining, restoring and reusing such**



vernacular dwellings exemplifies sustainable development. The Council encourages the restoration of such vernacular houses dwellings and other structures of note in the countryside, as opposed to their demolition and replacement. For this reason, there will be a presumption against the demolition of vernacular dwellings and structures where restoration or adaptation is considered by the Planning Authority to represent a feasible option.

Where it is proposed to demolish and replace an existing house which is considered to be a structure of ñete distinctive local character or a good example of vernacular architecture, a detailed and compelling justification for such a proposal shall be required to accompany a planning application. The refurbishment of derelict or abandoned buildings in the countryside is particularly favoured as being a sustainable response to revitalising rural areas. Proposals for restoration will generally be required to comply with the required standards for wastewater disposal and access.

A replacement house shall only be considered by the Planning Authority where the replacement house is generally contained within the curtilage of the previous house it is seeking to replace. In this regard, 'curtilage' comprises of the footprint of the dwelling which the proposed replacement house seeks to replace as well as any immediate areas ancillary to the function of the original house including gardens, paths, driveways, yards, garages or sheds. Curtilage does not, however, extend to areas not ancillary to the function of the subject house, for example agricultural sheds or yards used for farming purposes.

The Council shall assess applications for refurbishment and/or replacement of existing housing stock in rural areas, having regard to the criteria for residential development contained in Chapter 13, Development Management Standards.

In the assessment of whether a house which it is proposed to replace is habitable or not, the Council will rely on the definition contained in Section 2 (Interpretation) of the Planning & Development Act 2000 (as amended).

A "Habitable House" means a house which:

- a) is used as a dwelling,
- b) is not in use but when last used was used, disregarding any unauthorised use, as a dwelling and is not derelict, or,
- c) was provided for use as a dwelling but has not been occupied.

Recommendation No. 119

Insert the following policy in Section 3.17 *Rural Settlement Strategy* of the Draft Plan with subsequent policies to be renumbered appropriately:

RUR SET POL 10 To encourage the sensitive restoration of vernacular structures as an alternative to the construction of a one-off dwelling elsewhere subject to the following:

- The vernacular dwelling must be capable of being suitably restored to habitable accommodation in keeping with its original character without the necessity to demolish or significantly alter it.
- The distinctive character and original historic fabric of the structure is retained using appropriate traditional construction methods and materials.
- The development shall be subject to normal design requirements.



- The applicant/occupant will not be required to comply with the criteria set out in policy RUR SET POL 3.

Recommendation No. 120

Amend policy RUR SET POL 10 (or RUR SET POL 11 should Recommendation No. 119 be accepted) as follows:

RUR SET POL 10 To facilitate the replacement of a habitable dwelling, other than a vernacular dwelling, in the countryside subject to the following:

- a) The structure must have been last used as a dwelling and the internal and external walls and roof must be intact.
- b) A report from a suitably qualified competent person shall be submitted to verify that the house is habitable and that its replacement is the most sustainable option.
- c) The proposed replacement house shall generally be within the same curtilage of the existing house and the design of the replacement house shall be of a high standard whose scale and character is appropriate to the site, to existing development in the vicinity of the site and to the rural area generally.
- d) A condition requiring the demolition of the existing house will normally be included in any grant of permission.

Recommendation No. 121

Insert the following policy in Section 3.17 *Rural Settlement Strategy* of the Draft Plan with subsequent policies to be renumbered appropriately:

RUR SET POL 12 To facilitate, where it can be demonstrated by an applicant that a dwelling is no longer suitable for habitation (i.e. structure is in a ruinous or dangerous condition), its replacement with a new dwelling as an alternative to the construction of a new single dwelling elsewhere in the countryside. The development proposal, in terms of siting, scale, layout and design, shall be sympathetic to the character of the original structure and the site. Documentary evidence in the form of a structural survey and photographs shall be submitted in support of the application. All other normal siting and design requirements will be applied, and the applicant/occupant will not be required to comply with rural housing policy criteria.

Recommendation No. 122 (to be read in conjunction with previous Recommendation No. 121)

Amend policy RUR SET POL 3 as follows:

RUR SET POL 3 To accommodate demand from existing members of the rural community for permanent residential development in **Low Capacity Areas** who have strong links economic and social needs to the area and who are an intrinsic part of the rural community in which planning permission is being sought, subject to normal planning considerations and who satisfy the following criteria:



1. Persons with a demonstrable social need to live in a particular local rural area:
 - Persons who have lived a substantial period of their lives in the local rural area⁶ (minimum ~~18 months~~ **3 years**) in which the house is proposed.
2. Persons with a demonstrable economic need to live in the particular local rural area:
 - Persons employed full-time in rural-based activity such as farming, horticulture, forestry, bloodstock or other rural-based activity in the area in which they wish to build or whose employment is intrinsically linked to the rural area in which they wish to build, such as teachers in rural schools or other persons who by the nature of their work have a functional need to reside permanently in the rural area close to their place of work, provided that they have never owned a house in a rural area.

All applicants for one-off rural housing will need to demonstrate compliance with the qualifying criteria of one of the above two categories unless otherwise specified as being located within an area where this Rural Housing Policy does not apply.

Applicants relying on the economic need criteria involving part-time occupations in farming or natural resources-related activities, will be required to submit sufficient evidence to demonstrate same, for example (but not limited to) a herd number or hours of activity as a farmer. It should be noted that in such instances, any part-time occupation in farming or natural resources-related activities shall be the predominant occupation to any non-farming or non-natural resources-related incomes.

⁶ Local area is defined as within approximately a radius of 4km from the site, excluding defined urban areas (which relate only to the Carrick-on-Shannon development envelope containing land use zoning objectives). Where the site is of a greater distance, but the applicant can demonstrate significant ties with the area for example immediate family or well-established landownership, then these applications will be considered on their merits. This recognises applicants who are either a son or daughter of a landowner in which the house is proposed in which the landholding (as opposed to a site) is owned (or in the family name) for at least 10 years.

6.8 Economic Development

Submission Ref. Nos. DLCDP-82; and DLCDP-83

The benefits of remote working provisions have been raised in the submissions relating to economic development, with communal facilities and hubs such as The Hive in Carrick-on-Shannon cited as an effective example of such workplaces that can be facilitated in rural areas of the county. The social and economic benefits of such platforms in rural communities are also referenced.

Local markets showcasing the craft industry and organic farming would be an attractive addition to the settlements in the county as well as sustaining and supporting such sectors.

The submission from An Post (Ref. No. DLCDP-83) outlines the operational background to An Post which operates two distinct businesses: An Post eCommerce (Mails and Parcels); and An Post Customer (Retail), its properties, substantial road fleet, with increasing electric vehicles, etc. Ecommerce has seen a change in the system with substantial increases in online shopping, growing population, new settlements and improved infrastructural linkage. An Post will require additional sites to meet increasing demands.

The Council is requested to provide flexibility under their land use zonings and objectives in relation to An Post's facilities and operational requirements and to allow for the enhancement of existing facilities and the development of new postal infrastructure. The submission references that the operations of An Post are conducted in urban locations, often with tight constraints and amongst a variety of land uses. In this regard, the submission requests the inclusion of a specific land use classification for postal facilities and that '*postal facilities*' is considered a land use 'Permitted in Principle' or 'Open for Consideration' across all zoning objectives in the County Development Plan, and any subsequent Local Area Plan within the county.

The Council is also requested to include policies to support An Post in enhancing facilities and services. In this regard three policies are suggested:

- To support An Post in the provision of new postal facilities and the enhancement of existing facilities including operational requirements in the county.
- To facilitate the provision of postal infrastructure at suitable locations in the county.
- To promote the integration of appropriate post office facilities within new and existing communities that are appropriate to the size and scale of each settlement.

The specific requirements of An Post are also highlighted in the submission, especially in relation to car parking, access and deliveries.

- The Council is requested to adopt a flexible approach with parking standards which require sufficient parking spaces for both delivery vehicles and employees (including EV charging).
- Access is required on 24 hour basis. Restrictions on times of deliveries/collections, etc. impacts on the ability of An Post to meet postal needs.
- Sufficient loading bay space is required for collection/delivery and customers. In future public realm & movement strategies, it is requested that the Council consult with An Post to ensure sustainable solutions to maintain sufficient access for An Post.

One submission (Ref. No. DLCDP-67) has raised the issue of capitalising on the new Atlantic Technological University (ATU) and its potential for enhancing the attractions of the north west region,

including Co. Leitrim, as a location for investment with calls for the Plan to contain a specific development objective for the development of an ATU campus within the county.

Chief Executive's Response

The Draft Plan recognises the many benefits associated with remote working to local economies and in particular, the benefit of its application in Co. Leitrim in attracting new employees and residents to sustain our communities. In this regard, the Draft Plan contains a number of provisions relating to the future support and development of remote working practices such as policies EC DEV POL 2 and ENT EMPL POL 10, with further policy support for the development of remote working hubs contained in a number of settlements plans provided in Volume II of the Draft Plan. In this regard, it is considered that there is sufficient support for the future development and expansion of remote working platforms in the Draft Plan.

In response to the submission from An Post, the proposed policies are acknowledged and have been reviewed against the policy objectives included in the Draft Plan. It is considered that the policy objectives and zoning objectives included in the Plan are sufficient to cater for any new postal facilities or consolidation of existing operations. It is not considered necessary to include any specific policies for An Post in this regard. Other issues raised in the submission may be more appropriately progressed in local discussions with relevant Leitrim County Council officials. The Council are however concerned of a growing trend most recently witnessed in Manorhamilton where standalone post offices on principal streets are being subsumed into the floorplan of large edge of town centre convenience stores.

In response to the comments relating to the new Atlantic Technological University (ATU), the Council recognises and welcomes the renewed impetus for investment in higher level education services that the establishment of ATU can bring to the region. Moreover, the Council recognises the potential for developing synergies with an institution such as ATU across a number of sectors in operation in the county, with significant employers in the biotechnology, medical devices, agri-food and the arts and creative sectors. Related to developing such synergies, is the potential development of campus space in the county. ATU currently has a strong campus network featuring eight facilities across counties Donegal, Sligo, Mayo and Galway.

It is considered that there is merit in the inclusion of a policy within the Plan with the aim of developing further synergies and potentially on-campus or off-campus accommodation with ATU which can complement its current network of campus accommodation across the region.

Chief Executive's Recommendation

Recommendation No. 123

Amend policy EC DEV POL 4 as follows:

EC DEV POL 4 To maximise opportunities to strengthen links with ~~third~~ **higher** level institutions and ~~Sligo IT~~ **the Atlantic University (ATU)** and investigate opportunities for employment creation in relation to climate change, biodiversity and developing a carbon neutral economy.

Recommendation No. 124

Insert the following policy as EC DEV POL 5:

EC DEV POL 5 To support and explore the potential development of a higher-level on-campus or off-campus facilities in the county, potentially in collaboration with the Atlantic Technological University (ATU), and to promote, and facilitate where possible,



potential synergies between higher level education institutions such as ATU and enterprise sectors in Leitrim.



6.9 Infrastructure and Energy

Submission Ref. Nos. DLCDP-99; LCDP-105; DLCDP-126; DLCDP-130; DLCDP-139; DLCDP-183; and DLCDP-200

A number of submissions have been received in relation to infrastructure energy provisions contained within the Draft Plan, with the following items raised in the submissions relating to this theme:

- Request for the Council to take a more proactive approach in the National Broadband Plan rollout with concerns that north Leitrim is being left behind in its implementation and thereby impacting on remote working and small rural businesses.
- Concerns expressed in relation to Government's policy on public exposure to electromagnetic radiation and the planning legislation which has evolved since the introduction of the *Telecommunications Antennae and Support Guidelines (1996)* and wireless technology, with calls to cease planning permissions for telecommunications structures/antennae especially near homes and schools and to prioritise and incentivize the use of wired technology in the Plan. Suggested policy/text amendments are provided in this regard.
- Reference to the problem of soil conditions in the county as a barrier to wastewater treatment/disposal in rural settings, with the need to support the adoption of alternative systems such as reed and willow bed treatment or composting toilets, as well as the need to develop an approved set of standards for these systems.
- Wastewater and water supply provisions for Kiltyclogher need to adequately support the future development of the settlement.
- Request for the Council to acknowledge that every farmer in the county has a right to bore a well on their land and source water.
- Access to broadband and digital services across the towns, villages and communities of the county, with suggested policy provisions to reflect this.
- Rural roads should be maintained to an acceptable standard.

Chief Executive's Response:

In relation to the delivery of the National Broadband Plan (NBP), Section 9.17 of the Draft Plan refers to the implementation of the National Broadband Plan wherein it is noted that €56m will be invested for its implementation in Co. Leitrim, with National Broadband Ireland (NBI) the appointed body responsible for its rollout. Leitrim County Council recognises the strategic importance in implementing the NBP and delivering high-speed broadband infrastructure across the county, particularly given the high levels of intervention areas identified within the county. The Draft Plan actively supports the delivery of the National Broadband Plan, as well as the promotion of the Metropolitan Area Network fibre optic cable managed by eNET, with policies BR POL 1-3 providing sufficient policy support for the provision of key broadband services in the county.

Further references are made in the submissions relating to the provision of access to broadband and digital services, with suggested policies seeking to ensure the delivery of such services. Whilst the Draft Plan contains a number of policy provisions supporting the rollout of broadband services in the county, as outlined above, and Section 9.16 of the Draft Plan addresses the policy support for implementing the Digital Strategy for Leitrim, it should be reiterated that the primary function of the Draft Plan is that of a land use strategy to guide the future sustainable development of the county over the Plan period. The delivery of broadband services and digital services in the county fall under the auspices of organisations outside of the control of the Council and therefore the Plan cannot extend beyond its commitment to support the rollout of such infrastructure and services. The specific role of the Local Authority is in facilitating the rollout of infrastructure by expediting the assessment of Section 254 license and Road Opening licenses which is facilitated to the maximum extent which



resources permit. In addition, the Council have a Broadband Officer who liaises with the provider in ensuring that such licenses and other procedural matters are dealt with as expeditiously as possible.

In relation to the health and safety concerns expressed in relation to telecommunications structures/antennae and wireless technology, Section 9.18 of the Draft Plan addresses the issue of telecommunication infrastructure development, with policy TEL POL 1 seeking to promote and facilitate the provision of a high-quality telecommunications infrastructure network throughout the county having regard to the requirements of the *Telecommunications Antennae and Support Structures Guidelines*. Section 4.6 of *Telecommunications Antennae and Support Guidelines* (1996) details that matters of health are conditioned by the licensing arrangement with the Department of Transport, Energy and Communications (or relevant Department at that time). The Guidelines states that as part of the licencing framework in relation to mobile telephony, operators are now being required to comply with the relevant international standards in relation to emissions of non-ionising radiation from telecommunications antennae. Having regard to the requirement for compliance with the international standards relating to emission of non-ionising radiation, the safety standards under the Commission for Communications Regulations (ComReg) and relevant guidance, standards and legislation, no issues with regard to risk to public health from a planning perspective should arise.

In relation to the need to support the adoption of alternative systems with respect to on-site wastewater treatment in rural areas, the Draft Plan recognises that the soil characteristics of much of the county act as a significant barrier for prospective applicants for rural housing to comply with the current EPA Code of Practice for Domestic Waste Water Treatment Systems. Such issues have been well documented in the past, with the Council actively pursuing the exploration and development of technical alternatives that can facilitate the development of rural housing without compromising on public/human health and water quality.

In this regard, approval for the establishment of the research programme, EVAPOTREAT, has recently been granted and sees the collaboration of Trinity College Dublin, the EPA and Leitrim County Council in evaluating the applicability of nature-based, on-site wastewater treatment systems in areas with low soil permeability, such as Co. Leitrim, where solutions specified in the current Code of Practice for Domestic Waste Water Treatment Systems involving soil percolation will not work. The main focus of this research programme will be on carrying out full-scale field trials using willow evapotranspiration (ET) systems in an Irish climate in areas with representative low permeability soils in order to provide data from which robust design guidelines can be developed for zero discharge wastewater treatment systems. The project will be completed over a 36-month timeframe.

Notwithstanding, the legislative standard and basis for the assessment of individual domestic wastewater treatment systems remains the EPA *Code of Practice for Domestic Waste Water Treatment Systems (Population Equivalent ≤ 10)* (2021). The Draft Plan does contain a number of policy provisions (CS OBJ 14, RUR SET POL 1, RUR SET OBJ 1, RUR SET OBJ 7, DENSITY POL 2 and WI OBJ 6) aimed at promoting and supporting the provision of serviced sites in line with investment opportunities by the Department in order to attract people to build their own homes and live in villages and graigs, supporting the retention of services in such centres. The policy framework provided in the Draft Plan supporting the provision of serviced sites will provide a realistic and viable alternative to one-off housing in the open countryside whilst seeking to accommodate people to reside in rural areas to the maximum extent possible.

In relation to wastewater and water supply provisions for Kiltyclogher, the latest Irish Water Capacity Registers (June 2022) identified a wastewater treatment plant (WWTP) capacity of 500 population equivalent (P.E.) at Kiltyclogher WWTP, with a headroom capacity of 373 P.E. Similarly, the submission from Irish Water on the Draft Plan did not raises any water supply capacity concerns in relation to the



future development of Kiltyclogher over the Plan period. Accordingly, it is considered that there is sufficient wastewater and water supply capacities to cater for the envisaged growth of Kiltyclogher over the Plan period.

In relation to the submission from Leitrim IFA and the issue of private wells for sourcing water, Section 13.11 of the Draft Plan emphasises that where a bored well is necessary, details of distances from treatment systems can be obtained from the EPA *Code of Practice for Domestic Waste Water Treatment Systems (Population Equivalent < 10)* (2021), and the construction of private wells should comply with the guidance from the Institute of Geologist of Ireland publication, '*Water Well Construction*'. Section 13.7.2 of the Draft Plan reiterates that private bored wells used as a source of water supply to single dwellings are the responsibility of the householder, with such wells not regulated under the *European Communities (Drinking Water) Regulations, 2014*. The Council and Irish Water have no regulatory function in this regard.

In response to the issue of rural roads being maintained to an acceptable standard, the Draft Plan recognises the key economic, social and community function the local road network provides in the county. Section 8.11.5 of the Draft Plan emphasises that in its programme of spending over the Plan period, the Council will prioritise its spending on local roads which are deficient according to the strategic benefits and improved traffic and pedestrian safety which will result. The Council will have regard to the transportation needs of development generally, particularly that associated with agribusiness, tourism and the need to promote rural development and diversification in the prioritising of its spending.

Chief Executive's Recommendation

No change to the Draft Plan.



6.10 Rural Development

Submission Ref. Nos. DLCDP-84; LCDP-105; DLCDP-183; and DLCDP-200

Submissions received in the public consultation of the Draft Plan in relation to rural development, raised the following issues:

- Co. Leitrim is ideally placed to play a leading role in increasing the capacity of organic agriculture through the Organic Centre and the National Organic Training Skillnet (NOTS) to build capacity and support farmers and which help build food security.
- Rural enterprises and business startups should be supported by the Planning Authority.
- The Plan should insert a provision banning the development of hydraulic fracturing (fracking) gas exploration and extraction.

Chief Executive's Response

The Draft Plan recognises the key role the rural economy and its development plays and will continue to play in the overall development of the county. Particular recognition is given in the Draft Plan to the growth of the organic farming and food production sector, with opportunities for a multitude of innovative services and products stemming from this sector in terms of tourism, secure food production and education and skills-based learning. Co. Leitrim is well placed to capitalise on the future growth of this sector given the longstanding establishment of organic food producers in the county, most notably the Organic Centre. In this regard, the Draft Plan contains a number of policy provisions supporting the expansion of the organic farming and food production sector, notably in the objective RUR ECON OBJ 5 and policy AGR POL 2. Policy ENT EMPL POL 15 provides specific policy support to develop the green image of Co. Leitrim and the success of the food sector assets within the county which references the Organic Centre and the Food Hub as key examples in this regard.

Regarding the submission calling for support for rural enterprises and business start-ups, Chapter 10 of the Draft Plan provides the context and policy framework for rural development in the county. This includes a series of policies and objectives aimed at supporting the rural economy which extends beyond traditional rural economic sectors such as agriculture to include all aspects of the economy. Improved connectivity facilitating home working and digital hubs, broadband and rural economic development opportunities are all features recognised in the Draft Plan as key to harnessing the economic and enterprise potential of our rural areas and to strengthen and sustain them as living and working communities.

In response to the request for the insertion of a provision banning the development of hydraulic fracturing (fracking) gas exploration and extraction, Section 10.7.1 of the Draft Plan *Unconventional Gas Exploration and Extraction* directly addresses this issue. The Draft Plan acknowledges that a policy framework was contained within the Leitrim County Development Plan 2015-2021 which sought to adopt a 'precautionary principle' in relation to the prospective proposals for unconventional oil/gas exploration and extraction projects/operations such as hydraulic fracturing or fracking within Co. Leitrim. This policy framework, based on safeguarding the environmental, economic, social and ecological characteristics of the county, prohibited the development of such unconventional oil/gas exploration and extraction projects/operations within Co. Leitrim.

As referenced in Section 10.7.1 of the Draft Plan, following the enactment of the *Petroleum and Other Minerals Development (Prohibition of Onshore Hydraulic Fracturing) Act 2017* in July 2017, the exploration for and extraction of onshore petroleum by means of hydraulic fracturing is prohibited in the State. Given the effect of this legislation, and its amendment of the primary legislation of the



Petroleum and Other Minerals Act 1960, such proposals cannot be approved within the regulatory system now in place in Ireland which policy this Council fully supports. Moreover, given the requirements for development plans to be positive policy instruments and drafted in positive tone, as reflected in the Section 28 guidance, *Development Plans – Guidelines for Planning Authorities 2007*, and its successor guidance published in July 2022, it is considered there is no compelling reason to make reference in the Plan to the prohibition of a development class which is already prohibited in the State by national primary legislation.

Chief Executive's Recommendation

No change to the Draft Plan.

6.11 Sustainable Communities

Submission Ref. Nos. LCDP-105; DLCDP-157; DLCDP-173; DLCDP-183; and DLCDP-200

A number of submissions have been received in relation to the provision of services to cater for communities, with the following items raised in the submissions relating to this theme:

- The submission from Kiltyclogher Community Council (Ref. No. DLCDP-157) requests supports for community and social infrastructure and services identified for Kiltyclogher, including public transport to cater for an ageing population, health services, library, retail provisions and improvements to the school.
- The submission from Leitrim IFA (Ref. No. DLCDP-183) emphasises that local services in rural communities should be seen as a key component of the character and life of any village in rural Ireland.
- The submission from Good Energy Alliance Ireland (GEAI) (Ref. No. DLCDP-200) makes a number of suggested text and policy/objectives amendments and additions to the Draft Plan in relation to Public Participation Network (PPN) section of the Draft Plan (Section 7.7.1) and calls for more objectives in relation to community infrastructure.
- A separate submission (Ref. No. DLCDP-173) advocates the establishment of a dedicated '*Universal Design Working Group*' comprising of representations from the Council but also those with '*lived experience*' of the daily obstacles of accessibility faced by people with disabilities, older people and young families.
- Welcome '*Age Friendly*' initiatives where it is hoped that walkability audits will take place for Manorhamilton and Ballinamore, however, these need to be broadened to include people with disabilities and young families with a definite time frame in the Plan and extending to other towns and villages. Reference to a '*Crowd4Access*' project which is mapping footpaths for accessibility on a pilot basis in certain cities in Ireland, with an opportunity to use this mapping technology as part of these audits.

Chief Executive's Response

In relation to the submissions from Kiltyclogher Community Council (Ref. No. DLCDP-157) and Leitrim IFA (Ref. No. DLCDP-183) regarding the provision of local services, these are outside the remit of the County Development Plan. The Plan does however set out a strategic framework within which these services can be provided by the appropriate regulatory authorities.

The Planning Authority notes the suggested amendments to text and policies and objectives in relation to Section 7.7.1 *Public Participation Network* in the submission from Good Energy Alliance Ireland (GEAI) (Ref. No. DLCDP-200). In this regard, the Planning Authority is of the view sufficient coverage is provided in relation to the function of the Public Participation Network in the Draft Plan and reiterates that the Plan is a strategic land use document that, whilst it can support the development of community facilities through its policy framework, the provisions of such facilities is beyond the remit of the Plan.

Regarding the suggested establishment of a dedicated '*Universal Design Working Group*', it is considered that while such a proposal is worthy of policy reference within the Plan, the establishment of such a working group is beyond the remit of the County Development Plan. Similarly, requests for the expansion of initiatives such as walkability audits to other settlements are considered more appropriate to separate strategies such as Leitrim Local Economic and Community Plan (LECDP) and the Leitrim Age Friendly Strategy.



Chief Executive's Recommendation

No change to the Draft Plan.



6.12 Tourism and Recreation

Submission Ref. No. DLCDP-48; DLCDP-70; DLCDP-73; DLCDP-105; DLCDP-145; DLCDP-157; and DLCDP-183

A number of submissions have been received in relation to tourism development in the county, with suggested amendments provided in relation to the provision contained within the Draft Plan.

The submissions from Save Dough Mountain Group (Ref. No. DLCDP-48) and Leitrim Tourism Network (Ref. No. DLCDP-70) emphasise the importance of the tourism sector in Ireland and the significant employment levels provided by the sector. The submission cites one of the Strategic Pillars of Leitrim Tourism Product, identified in Table 5.1 of the Draft Plan, where it states that all *“investment decisions in product/infrastructure capitalise on, but protect, Leitrim’s natural & built assets that give Leitrim a lead within competitive set”*. This is considered negated by developments such as monoculture plantations, wind farms and mining exploration in such landscapes with a suggested amendment to the wording of this goal provided also.

The submission also requests that a reference to Leitrim’s Dark Skies status be referenced to the feasibility study on Slaibh an Iarainn and north Leitrim as national parks. Further reference is made to the cycling and walking route contained on Dough Mountain and its value as a recreational area. The submission also references the policy provisions contained in the Draft Plan under Section 5.6 *Adventure Tourism, Lakes and Waterways*, with suggested amendments in relation to water quality references and tourism accommodation.

The submissions from Leitrim Tourism Network and Ballinamore Development Company (Ref. No. DLCDP-145) are supportive of the provisions contained within the Draft Plan relating to the development of greenways, particularly in relation to the development of the SLNCR and the Cavan-Leitrim greenway projects. The Leitrim Tourism Network advocates the exploration of the tourism potential of green lanes to act as arteries to greenways and designated as walking and cycling routes connecting heritage and tourism sites with existing tourism accommodation thus encouraging new agri-tourism related developments.

The submission from the Leitrim Recreation Forum (Ref. No. DLCDP-73) welcomes the provisions of the Draft Plan in relation to tourism and reiterates the important infrastructural projects underway which will transform the recreational amenities in the county and act as a significant catalyst for an enhanced tourism product.

The submission from Kiltyclogher Community Council (Ref. No. DLCDP-157) supports the establishment of Kiltyclogher as a Heritage Town and viewed as essential to its vision of Kiltyclogher as a tourist destination encompassing such assets as the house of Seán Mac Diarmada, the heritage centre, the holiday centre and the community sensory garden. The submission also calls for support for the development of walking and cycling trails, a café, public toilets facilities and a community service programme to support innovation.

The submission from Keep Ireland Open (Ref. No. LDCP-105) is extensive and offers a significant level of comment on the content of the Draft Plan. The focus of the submission is generally on tourism and related themes such as the countryside and the provision of walking and cycle routes for recreational purposes, public access and protection of heritage, but comment is also made on wider issues.

The following is a brief summary of the content:



- The Draft Plan is described as failing to comply with statutory legislation, guidelines, and plans.
- There is criticism that the Draft Plan has not carried forward the policy objectives from the 2015 County Development Plan and it is suggested that many objectives which should have been included or updated have been lost. It is requested that the 2015 County Development Plan be revisited and its objectives incorporated.
- A critique is provided of the Contents, Index, Design and Development Standards and Layout of the Draft Plan;
- The submission includes extracts of text and policies from other County Development Plans and recommends they are included in the Draft Plan;
- A large number of additions and amendments to policy objectives and textual changes to the Draft Plan are suggested. Recommendations are in relation to Agricultural Activity and Diversification, Forestry, Renewable Energy, Economic Development, Extractive Industries, Public Rights of Way, Walking and Cycling, Social, Community and Cultural Development; Natural, Built, Archaeological and General Heritage; and Development Management Standards.

Chief Executive's Response

The County Development Plan provides a strategic planning framework for the development of the county and contains appropriate policy content to support the potential progression of tourism initiatives. The policy support for tourism and recreation is outlined in Volume 1, Chapter 5 (Tourism), in which a policy context for the planning and development of tourism and tourism assets within the county is provided. The Draft Plan strongly supports sustainable tourism development within the county and includes suitable policy expression in this regard.

The Council recognises the numerous benefits from the existing greenways in the county and the further development of walking and cycling routes, in particular as a tourism product to attract overseas tourists, for local communities in terms of economic benefits and for all users as an amenity for physical activity and a contributor to health and wellbeing.

Section 5.5 (Greenways, Cycling and Walking) of Chapter 5 (Tourism) conveys the extent of support for walking and cycling. Objective ADV TOUR OBJ 6 further confirms support. The existing policy framework inclusive of specific objectives is considered satisfactory in terms of extending existing and provision of new greenways in the county within the plan period.

As part of the preparation of the Draft Plan existing policies were reviewed and updated in line with national and regional policy. Development Plans from other Local Authorities were reviewed where applicable and considered relevant to Co. Leitrim. The *Development Plan Guidelines* (2007) were also consulted with regard to format, structure, and content. The recently published *Development Plans Guidelines for Planning Authorities* (2022) have also been consulted and the Draft Plan is considered to demonstrate adherence to guiding principles set out for Quality in Plan-making. The Planning Authority would point to the positive assessments of the Draft Plan by the Office of the Planning Regulator and Northern and Western Regional Assembly in this regard.

Whilst the proposed additional text and associated policies and objectives have been reviewed, it is considered that the narrative and associated policies and objectives in the Draft Plan provide sufficient background information, context, and policy platform to guide, support, and facilitate development proposals, in addition to protecting the environmental and built assets of the county. There are broad similarities between the proposed text and policies and objectives included in the submission by Keep Ireland Open to that set out in the Draft Plan and therefore it is not considered that the changes are necessary as it would not result in a change in the policy direction of the Draft Plan.



It is considered that there is a strong emphasis on climate change, sustainable transport, and environmental protection that will ensure the Strategic Aims of the Plan can be achieved on a sustainable platform.

Chief Executive's Recommendation

No change to the Draft Plan.



6.13 Transport

Submission Ref. No. DLCDP-16; DLCDP-70; DLCDP-82; DLCDP-105; DLCDP-173; DLCDP-196; and DLCDP-200

A number of submissions have been received in relation to transport and movement development in the county, with suggested amendments provided in relation to the provision contained within the Draft Plan.

A number of submissions have referenced the provision of blueways and greenways, which while also having a tourism and recreational function, are also emerging as key pieces of infrastructure for active travel. One submission (Ref. No. DLCDP-16) makes reference to the Cavan-Leitrim greenway with suggested amendments to objectives BG OBJ 2 and BG OBJ 3 to provide greater reference to settlements linked by the greenway and an amendment to policy BP POL 1 to reinforce bicycle parking and greenway developments.

Related to greenway development, the Leitrim Tourism Network (Ref. No. DLCDP-70) requests that the Council provide best practice and uniform development guidelines for traffic calming measures and greater measures to in the Draft Plan to encourage cycling in our towns and villages.

Other submissions have raised the issue of Electric Vehicle (EV) charging infrastructure with calls for the provision of more rapid charging points (Ref. No. DLCDP-82) and suggested policy provisions to encourage the transition from fossil fuel-based cars to EVs (Ref. No. DLCDP-200).

References to the prospective Carrick-on-Shannon by-pass are also made in the submission with commentary on the design and management of this proposal, as well as traffic management measures for the town during construction.

A request is included that all new and upgraded infrastructure and services should be constructed and located using the principles of universal design with access to transport services a key element.

In relation to rail transportation, the submission from Iarnród Éireann (Ref. No. DLCDP-196) welcomes a number of provisions contained within the Draft Plan on this item, in particular, the strategic aim of the Council to integrate land use and transport policies to achieve the delivery of a high quality, climate resilient and sustainable transport network for Co. Leitrim.

Moreover, Iarnród Éireann welcomes policy PT POL 4, which affirms the Council's support for the implementation of Iarnród Éireann's *'Strategy 2027'* to deliver high-capacity sustainable public transport solutions, objective MSSM OBJ 1 regarding the preparation of a Local Transport Plan for Carrick-on-Shannon and objective WC OBJ 2 which seeks to enhance placemaking and improve pedestrian and cycle connectivity to existing train stations.

The submission emphasises that there is a significant opportunity in Leitrim to increase the rail modal share over the Plan period, with an increase on the Dublin-Sligo line to two-hourly all day forms part of its *'Strategy 2027'*.

Information is provided on a number of Iarnród Éireann actions and initiatives which it is suggested could be supported in the Development Plan, including the development of Customer Information Services (CIS) providing reliable real time passenger information, the implementation of the Sustainable Interchange Programme and the electrification of Intercity routes to de-carbonise the rail network. It is also suggested that Leitrim County Council should consider the findings of Iarnród Éireann's final version of the Rail Freight Strategic Plan when finalising the new Development Plan.



Additional comments in the submission relating to rail transport call for the upgrade of Carrick-on-Shannon train station to provide for a larger car park, taxi rank, EV charging points, covered bicycle storage and local link bus stop. The importance of extending the commuter train service to Carrick-on-Shannon is also stated in the submissions.

Chief Executive's Response

The Council recognises the numerous benefits from the existing greenways in the county and the further development of walking and cycling routes, in particular as a tourism product to attract overseas tourists, for local communities in terms of economic benefits and for all users as an amenity for physical activity and a contributor to health and wellbeing.

With regard to Electric Vehicles, there is strong policy support in the Draft Plan in relation to facilitating the provision of charging infrastructure and to support the growth of this type of vehicle (Sections 8.10.4 (Electric Vehicles) and 12.7.2 (Sustainable Transport) refer).

In terms of accessibility, there is policy support throughout the Draft Plan for Universal Design to be applied to all developments and is specifically mentioned in Section 13.2.2 (Universal Access and Inclusive Design).

The policy support from Iarnród Éireann in terms of the strategic direction of the Draft Plan is welcomed and the comments and suggestions in the submission are noted.

Policy objectives relating to rail infrastructure have been included in Section 8.4 of the Draft Plan and in particular policy ILU POL 1 and objective ILU OBJ 2 which support both integration of the rail services to deliver an integrated system and the development of proposed rail facilities and supporting infrastructure in the county.

Chief Executive's Recommendation

No change to the Draft Plan.



6.14 Heritage and Biodiversity

Submission Ref. No. DLCDP-1; DLCDP-3; DLCDP-26; DLCDP-42; DLCDP-52; DLCDP-99; DLCDP-128; DLCDP-169; DLCDP-181; and DLCDP-188

Natural Heritage and biodiversity have been outlined in a number of the submissions received. The importance of biodiversity and the impact it has on the environment has been identified as a key concern for the future. The importance of protected landscapes, habitats and species is also mentioned in a number of submissions with additional legislation being called for to further protect them and one submission calls for a new Special Area of Conservation being designated for north Leitrim. The expansion of the Decarbonised zone for Carrick-on-Shannon is also called for.

A number of the submissions received refer to the issue of hedgerow cutting while one submission refers to the problem of littering in the county.

The inclusion of protected views over Lough Allen is also outlined in one of the submissions as well as the protection of sensitive landscapes from inappropriate development.

The concept of '*Natural Capital*' is outlined in one of the submissions and it is proposed that the Local Authority use this mechanism as a toll for measuring performance in the future.

In relation to built heritage, submissions have been received to include two additional structures onto the Record of Protected Structures.

Chief Executive's Response

Biodiversity underpins important economic sectors such as agriculture, tourism and recreation and is a core component of the county's '*Green Infrastructure*'. It is the aim of the Council to conserve, sustainably manage and enhance the county's natural heritage and biodiversity and to promote understanding of and sustainable access to it. Various Plan provisions provide for considerations in relation to biodiversity to be taken into account, including Policy NH POL 10, which is to: "*To ensure the protection, conservation and enhancement of the biodiversity of the county.*" In terms of biodiversity loss, the Council would contend that there is robust policy support within the Draft Plan, specifically in Section 11.3 (Natural Heritage and Biodiversity) of Chapter 11 (Heritage), to address this.

As regards designating areas as Special Areas of Conservation (SAC), this is the responsibility of the Department of Housing, Local Government and Heritage and outside the remit of a County Development Plan to do so. The submitter would be advised to make contact with the Department in this regard.

The designation of Carrick-on-Shannon as a '*Decarbonising Zone*' (DZ) follows the requirement outlined in the national Climate Action Plan for each Local Authority to identify and develop plans for one '*Decarbonising Zone*' within their functional area.

Policy support (TWH POL 4) as outlined in 11.10 Trees, Woodlands & Hedgerows promote the retention of existing and planting of native hedgerow species. It should be noted that the control of hedge cutting is regulated by The Wildlife Act 1976 (as amended) and not through the County Development Plan process.

In June 2020, Leitrim County Council commissioned RPS Group to undertake a review of the designated landscapes and views and prospects in the County. The report entitled '*Leitrim Review of Views and Prospects*' (June 2021) presents the findings of a comprehensive review of the designated

views in the county. The ‘Leitrim Review of Views and Prospects’ (June 2021) forms Appendix VIII to the Draft Plan. Policy LD POL 1 of the Draft Plan seeks to protect important views from intrusive developments. These scenic views are of an amenity and tourism value and any development proposed within the view is required to be designed and located so as not to obstruct the view or be unduly intrusive in the landscape as seen from these vantage points.

The proposed protected view and prospect marked “V21” relates to views towards Lough Allen from the regional route, R280 and is included in Figure 11.4 of Volume I of the Draft Plan and as Map No. 12 of Volume III. It is acknowledged that the indicative arrow in the 2015-2021 CDP is at a different location to where it is positioned in the Draft Plan. It is important to note that the view direction indicated in the map is to be interpreted as providing only a general indication of the direction of the view which, for many of the viewpoints, corresponds to a panoramic view and in other cases, the view has a narrow field of vision. In both the 2015-2021 County Development Plan and the Draft Plan, the protected view was described as “View towards Lough Allen from the R280”.

Leitrim County Council has an obligation to include a Record of Protected Structures or parts of structures which are of special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest. The following refers to each structure individually identified and whether it should be included on the Record of Protected Structures (RPS):

- 1) Armstrong’s Bar and Bakery, Bridge Street, Carrick-on-Shannon
The structure is located within the Carrick-on-Shannon Area of Architectural Conservation (ACA) and is immediately adjacent to another protected structure, the Costello Memorial Chapel. The structure is registered on the National Inventory of Architectural Heritage (NIAH) with a rating of Regional importance. The structure warrants inclusion on the RPS.

- 2) 3-arched masonry road bridge, Cornagher
The structure is located on a local road, L55151, in the townland of Cornagher. The bridge is a 3-arched bridge which was constructed in the early 1800’s with historical, architectural and technical interest. The structure warrants inclusion on the RPS.

Chief Executive’s Recommendation

Recommendation No. 125:

Include the following structures on the RPS:

RPS no.	NIAH Reg. No.	ITM	Townland	Description	Detail
272	30813019	193787, 299550	Townparks	End-of-terrace two-bay three-storey house, built c.1840, with early-twentieth century shop and public house to ground floor. Front facade only.	The modest façade of this terraced house and shop is enhanced by its doorcase with spoked fanlight. The dual function of both retail and public house, reflecting past tradition in Irish towns and villages.
273		611964, 803961	Cornagher	3-arched masonry road bridge	

**SECTION 7 -
ZONING SUBMISSIONS**

7 ZONING SUBMISSIONS

7.1 Introduction

Submissions that were received in relation to land use zoning objectives applying to particular areas within settlements were considered having regard to national policy as set out in the National Planning Framework, regional policy as set out in the Regional Spatial and Economic Strategy for the Northern and Western region as well as the overall strategic objectives set out in the Draft Leitrim County Development Plan 2023-2029. Proposals for land use zoning must align with the Core Strategy as well as taking into account the existing built environment of the particular settlement and the placement of the settlement within the settlement hierarchy outlined in the Draft Plan. This approach will ensure a strong and robust hierarchy that can continue to promote a high standard of living for local communities and where there is an alignment of population, employment and housing growth supported by enabling infrastructure.

The identification of lands for development over the lifetime of Development Plan must ensure that the delivery of development is realistic relative to the capacity of the necessary infrastructure or the level of infrastructural investment that may be required and timeframe for providing same. As a result, each submission has been subject to an infrastructural assessment and land use evaluation. All sites have been appraised based on infrastructural requirements and land use criteria. For infrastructural requirements, each site is assessed in terms of road & footpath infrastructure, water supply and waste water capacities. Table 7.1 provides a summary of the evaluation process for physical infrastructure (Tier 1, Tier 2 and unserved). Table 7.2 sets out the land use evaluation criteria: Compact Growth, Public Transport & Coordinated Growth. Sites evaluated either meet (✓) or do not meet (✗) these criteria.

Table 7.1 Infrastructure Requirements

Score	Infrastructure Requirements
1	Existing infrastructure can support the development of the site, subject to on-site works, some minor works at access points or linking into available existing systems.
2	Some off-site works are required but could be delivered as part of a planning application to develop the site or capital investment is identified to facilitate development over the course of the Plan.
0	The land could not reasonably be serviced over the course of the plan and capital investment works have not been identified to meet the infrastructural need to develop the site over the course of the Plan. These sites are discounted, and no further assessment is made.

In order for a parcel of land to be identified as 'Tier 1' there shall be no infrastructure impediments restricting the development of the lands i.e. all transportation and water services infrastructure needs are in place. Sites which may require minor additional works or investment have also been identified as Tier 1 in certain circumstances. This is dependent on the nature and scale of the works required.

Table 7.2 Planning and Land Use Criteria

Characteristic	Description
Compact Growth	Proximity of the site to the town / village centre and services
Co-ordinated Development	That the development of the land will contribute to or complete the strategic development of the wider area

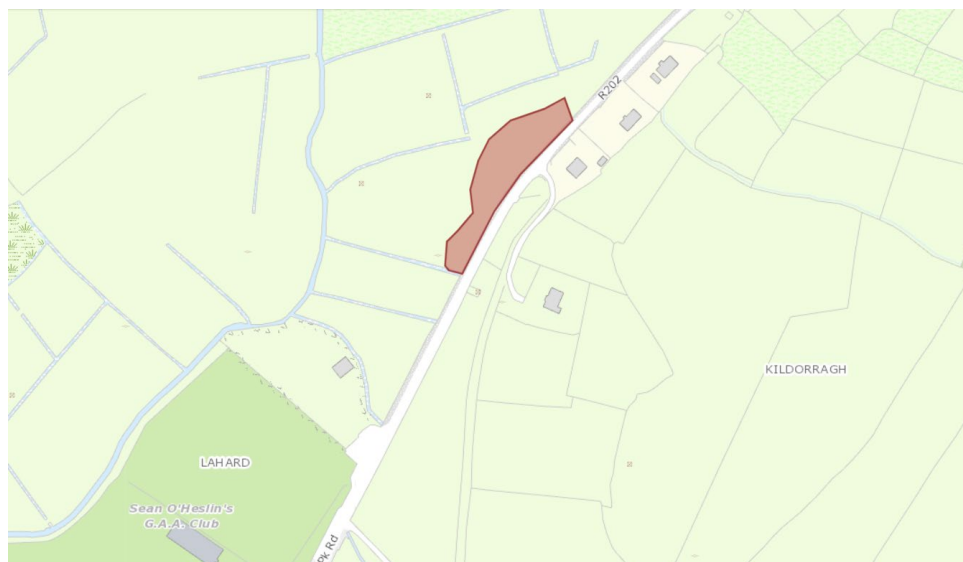


For ease of reference the submissions have been grouped according to settlement with general land use zoning submissions addressed towards the end of the section.

7.2 Ballinamore

Submission no.	DLCDP-115
Submitted by:	Sammon Developments Limited
Theme (s):	Zoning - Ballinamore

Map showing lands subject to Submission:



Summary of Submission:

The submission relates to lands in the townland of Kildorragh (Carrigallen By) to the northeast of Ballinamore. The site was zoned as *Enterprise and Employment* land use zoning objective in the Leitrim County Development Plan 2015-2021 and is outside the settlement boundary proposed in the Draft Plan. The submission seeks to include the lands within the settlement boundary of Ballinamore and zone for *Employment and Enterprise* use.

Chief Executive’s Response:

The lands in question form part of a larger landholding and it is noted that the lands that are proposed to be zoned are approximately 130m from the revised settlement boundary as defined in the Draft Plan. A key principle of the NPF and RSES is to promote consolidation of existing settlements and more compact forms of growth. As such, it is an objective of the Draft Plan, in line with national and regional policy, to facilitate infill and brownfield development within the existing built footprint of urban settlements. This greenfield site on the periphery of the settlement boundary does not provide for brownfield or the sequential development of the town.

A Strategic Flood Risk Assessment was prepared as part of the preparation of the Draft County Development Plan which indicates areas of pluvial flooding on the remainder of the lands indicated to be within Flood Zones A and B. Owing to the peripheral location of the lands, together with their vulnerability to potential flooding, it is recommended that there is no change to the Draft Plan on foot of this submission. The Chief Executive notes that there is a current planning application with respect to the subject lands which is the subject of a request for further information at present.



Infrastructural assessment and land use evaluation

Roads	Footpath	Water Supply	Waste Water	Compact Growth	Co-ordinated Development
1	0	1	2	x	x

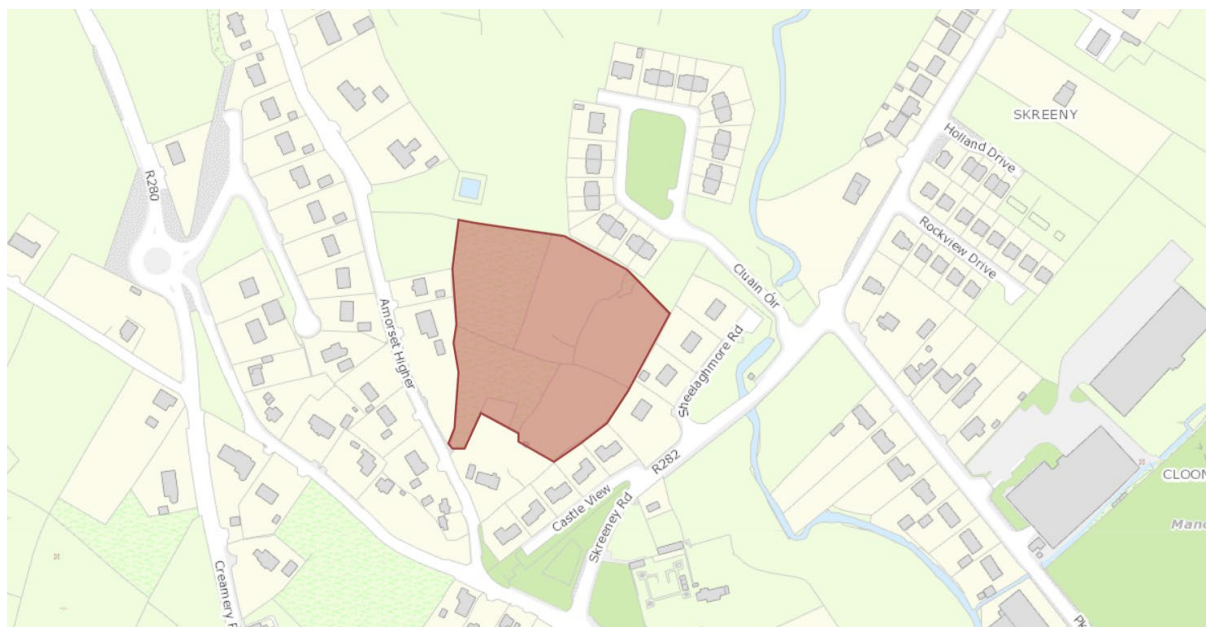
Chief Executive's Recommendation

No change to the Draft Plan.

7.3 Manorhamilton

Submission no.	DLCDP-5
Submitted by:	Gerry O’ Hagan
Theme (s):	Zoning - Manorhamilton

Map showing lands subject to Submission:



Summary of Submission:

The submission relates to lands in the townland of Amorset within the settlement boundary of Manorhamilton. The site was zoned as *Primary Residential (Undeveloped)* land use zoning objective in the Leitrim County Development Plan 2015-2021 and is zoned as *Agriculture* in the Draft Plan. It is requested to zone the lands for residential purposes.

Chief Executive’s Response:

Residential development in the vicinity of the proposed site is generally characterised by single dwellings on individual sites, and low-density multi-unit residential development.

The plot of land identified measures approximately 1.7 ha in size. In terms of potential residential yield, the Core Strategy of the Draft Plan has identified possible densities of 20 units/ha for residential lands and 10 units/ha for low density/infill sites. If the proposed site was zoned for residential purposes, it would equate to the provision of 34 no. residential units. If a low-density residential zoning were applied, it would equate to the provision of 17 no. residential units.

By designating residential land use zoning on these lands, it would necessitate an allocation of housing units from the Core Strategy and as a result would reduce the allocations available to other towns, villages and rural areas in the county. It is considered that the approach taken in the Core Strategy outlines the most sustainable and balanced approach to the future development of both the urban and rural areas of the county, and in respect of Manorhamilton, the approach is consistent with the established pattern and character of the area.

As part of this evidence-based approach to the identification of lands for residential development, an Infrastructural Assessment and Land Use Evaluation was carried out. This assessment is based on a

range of criteria including infrastructure availability/constraints, the proximity of the lands to existing services and facilities, and any environmental constraints that may impede or restrict the development of the lands.

The Infrastructural Assessment has identified constraints in terms of the provision of a suitable access and footpath connectivity. The provision of a connecting footpath would require acquisition of part of the curtilage of an adjoining house which may prove difficult to acquire. The footpath on the opposite side of the roadway is also constrained in terms of its width / obstructions. While these could potentially be delivered as part of a planning application to develop the site or capital investment is identified to facilitate development over the course of the Plan, it is considered that more suitable locations are available presently without such constraints within Manorhamilton. There is also the possibility that the lands may be accessed at a more appropriate location by means of the access road to the Cluain Óir development to the northeast of the lands.

When assessing the potential for access to these lands and the adjacent lands to the north, it was noted that access agreements are in place between Leitrim County Council and Irish Water in relation to the existing Reservoir which is zoned ‘Utilities’ in the Draft Plan. As a result, the lands between the reservoir and the public road should be zoned as ‘Utilities’ land use zoning objective.

Infrastructural assessment and land use evaluation

Roads	Footpath	Water Supply	Waste Water	Compact Growth	Co-ordinated Development
2	2	1	1	✓	✗

In conclusion the quantum of residential land identified for development has to be aligned with the housing demand for each settlement as set out in the Core Strategy. The identification of any additional lands would result in the Plan being inconsistent with the Core Strategy and national and regional policy.

Chief Executive’s Recommendation

Chief Executive’s Recommendation No. 126:

Change the land use zoning objective of the lands between the public road and the Reservoir from *Agriculture* to *Utilities*.

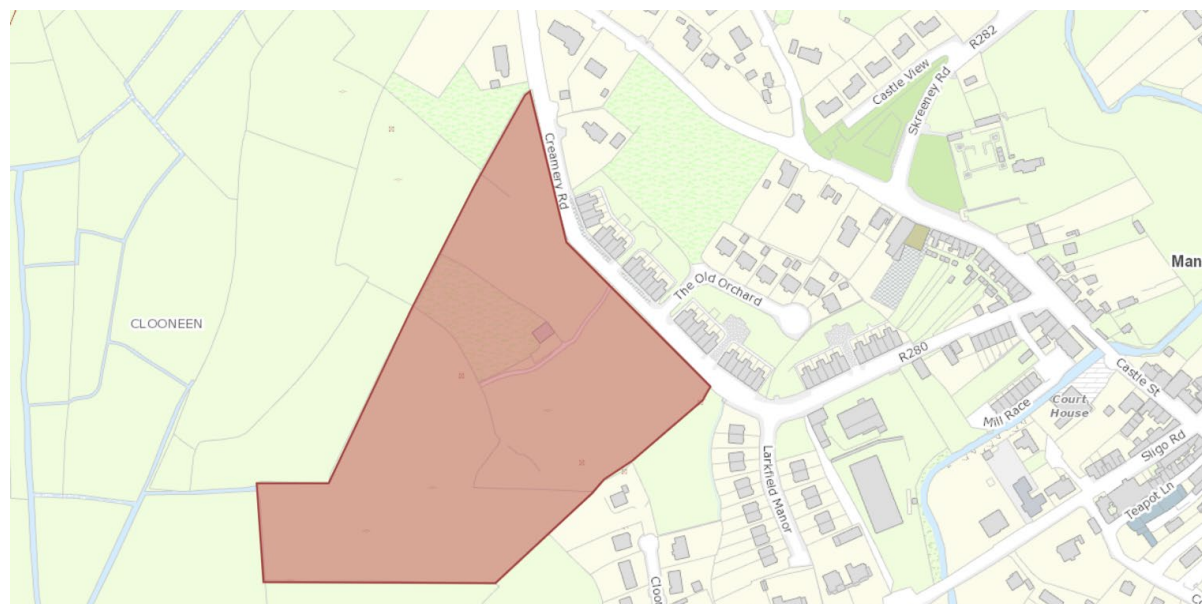
Chief Executive’s Recommendation No. 127:

Insert the following objective into the Manorhamilton Settlement Plan in Section 3 of Volume II of the Draft Plan:

MHN 21: Facilitate access to allow for the future development of potential future residential sites with poor infrastructure connections in the interests of more sustainable compact growth development patterns over the lifetime of this Development Plan and beyond.

Submission no.	DLCDP-6
Submitted by:	Damien Treanor & Cormac Mc Closkey
Theme (s):	Zoning - Manorhamilton

Map showing lands subject to Submission:



Summary of Submission:

The submission relates to lands in the townland of Clooneen (Rosclogher By) within the settlement boundary of Manorhamilton. The site was zoned as *Residential Reserve/Support* in the Leitrim County Development Plan 2015-2021 and is zoned as *Social & Community* and *Agriculture* in the Draft Plan. It is requested to zone the lands for residential purposes.

Chief Executive’s Response:

The plot of land identified measures approximately 5 ha in size. In terms of potential residential yield, the Core Strategy of the Draft Plan has identified possible densities of 20 units/ha for residential lands and 10 units/ha for low density/infill sites. If the proposed site was zoned for residential purposes, it would equate to the provision of 100 no. residential units. If a low-density residential zoning was applied, it would equate to the provision of 50 no. residential units.

By designating residential land use zoning on these lands, it would necessitate an allocation of housing units from the Core Strategy and as a result would reduce the allocations available to other towns, villages and rural areas in the county. It is considered that the approach taken in the Core Strategy outlines the most sustainable and balanced approach to the future development of both the urban and rural areas of the county, and in respect of Manorhamilton, the approach is consistent with the established pattern and character of the area.

As part of this evidence-based approach to the identification of lands for residential development an Infrastructural Assessment and Land Use Evaluation was carried out. This assessment is based on a range of criteria including infrastructure availability/constraints, the proximity of the lands to existing services and facilities, and any environmental constraints that may impede or restrict the development of the lands.

Infrastructural assessment and land use evaluation

Roads	Footpath	Water Supply	Waste Water	Compact Growth	Co-ordinated Development
1	2	1	1	✓	✓

In conclusion the quantum of residential land identified for development has to be aligned with the housing demand for each settlement as set out in the Core Strategy. The identification of any additional lands would result in the Plan being inconsistent with the Core Strategy and national and regional policy.

The Draft Plan has also identified a specific objective on these lands, MHN 26, to facilitate the Department of Education in the development of a new Gaelscoil on the Creamery Road. The Department of Education have acknowledged the inclusion of this objective in their submission on the Draft Plan.

Chief Executive’s Recommendation

No change to the Draft Plan.

Submission no.	DLCDP-7
Submitted by:	Paddy McGrath
Theme (s):	Zoning - Manorhamilton

Map showing lands subject to Submission:



Summary of Submission:

The submission relates to lands in the townland of Manorhamilton within the settlement boundary of Manorhamilton. The site was zoned *Primarily Residential (Developed)* land use zoning objective in the Leitrim County Development Plan 2015-2021 and is zoned as *Open Space & Amenity* land use zoning objective in the Draft Plan. It is requested to zone the lands for residential purposes.

Chief Executive’s Response:

The plot of land identified measures approximately 1.1 ha in size. In terms of potential residential yield, the Core Strategy of the Draft Plan has identified possible densities of 20 units/ha for residential lands and 10 units/ha for low density/infill sites. The proposed site could potentially be classed as an infill site given that it is surrounded by an existing residential development. As such the proposed yield from these lands would likely to be low – medium density similar to that which adjoins it equating to approximately 20 no. units per ha which would equate to 22 no. residential units.

By designating residential land use zoning objectives on these lands, it would necessitate an allocation of housing units from the Core Strategy and as a result would reduce the allocations available to other towns, villages and rural areas in the county. It is considered that the approach taken in the Core Strategy outlines the most sustainable and balanced approach to the future development of both the urban and rural areas of the county, and in respect of Manorhamilton, the approach is consistent with the established pattern and character of the area.

As part of this evidence-based approach to the identification of lands for residential development an Infrastructural Assessment and Land Use Evaluation was carried out. This assessment is based on a range of criteria including infrastructure availability/constraints, the proximity of the lands to existing

services and facilities, and any environmental constraints that may impede or restrict the development of the lands.

Infrastructural assessment and land use evaluation

Roads	Footpath	Water Supply	Waste Water	Compact Growth	Co-ordinated Development
1	1	1	1	x	x

Having regard to the distance of the lands from the centre of the Plan area (approximately 700m), a ‘Residential’ zoning would not be consistent with the required application of the sequential approach. The sequential approach specifies that the zoning of lands shall extend outwards from the centre of an urban area with undeveloped lands closest to the core and on public transport routes being given preference, encouraging infill opportunities, and that areas to be zoned shall be contiguous to existing zoned development lands. The lands are not currently needed to satisfy residential land requirements.

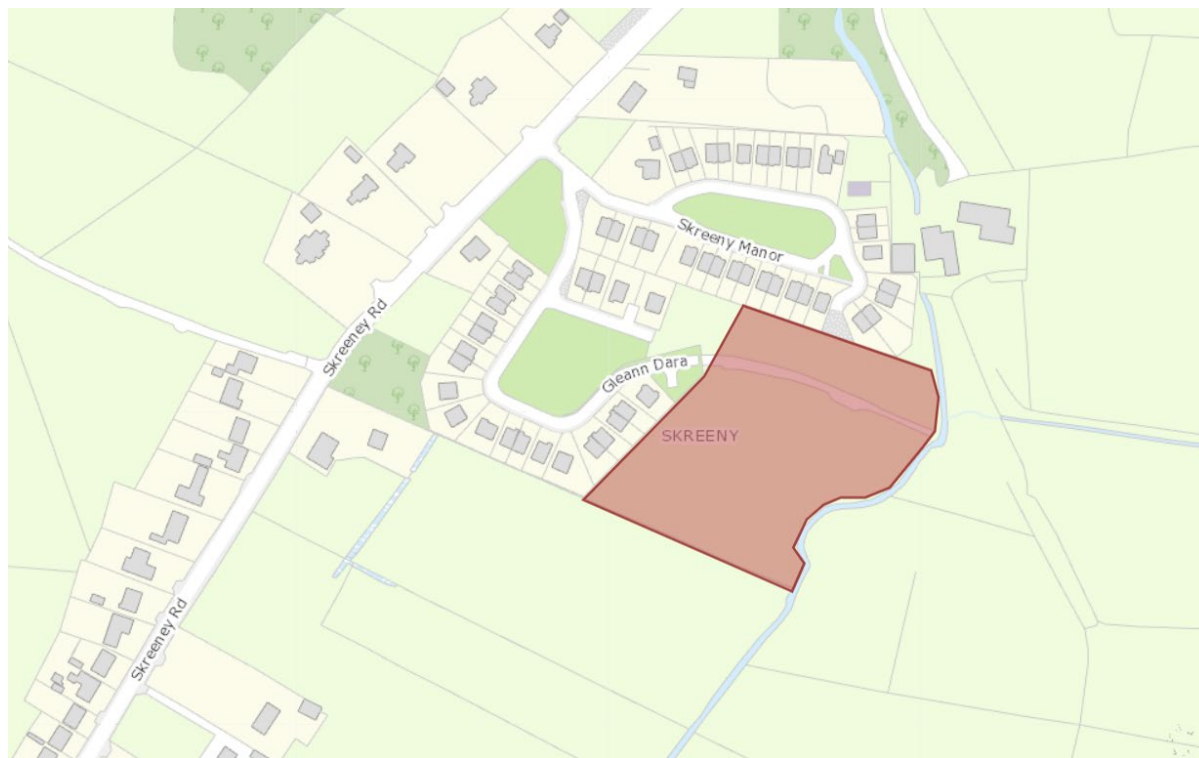
In addition, the Planning Authority would have concerns with regard to the accessing of the subject lands from within the existing housing development where insufficient space appears to have been retained between houses. There is no footpath provided at this link and it is difficult to foresee how this can be overcome. Furthermore, the subject site is elevated above the existing houses within the Millhill Lawns housing development. The development of conventional two storey housing has the potential to cause direct overlooking and loss of privacy of housing on 3 sides of the subject lands with a sheer drop along the western boundary. The Planning Authority would question the suitability of the subject lands for residential development notwithstanding the planning history associated with the overall lands from which this site was acquired.

Chief Executive’s Recommendation

No change to the Draft Plan.

Submission no.	DLCDP-8
Submitted by:	Larry McDermott
Theme (s):	Zoning - Manorhamilton

Map showing lands subject to Submission:



Summary of Submission:

The submission relates to lands in the townland of Skreeny (Rosclagher By) within the settlement boundary of Manorhamilton. The site was zoned *Enterprise & Employment* land use zoning objective in the Leitrim County Development Plan 2015-2021 and is zoned as *Agriculture* land use zoning objective in the Draft Plan. It is requested to zone the lands for residential/mixed use purposes.

Chief Executive’s Response:

The plot of land identified measures approximately 1.8 ha in size. In terms of potential residential yield, the Core Strategy of the Draft Plan has identified possible densities of 20 units/ha for residential lands and 10 units/ha for low density/infill sites. If the proposed site was zoned for residential purposes, it would equate to the provision of 36 no. residential units. If a low-density residential zoning were applied, it would equate to the provision of 18 no. residential units.

As part of this evidence-based approach to the identification of lands for residential development an Infrastructural Assessment and Land Use Evaluation was carried out. This assessment is based on a range of criteria including infrastructure availability/constraints, the proximity of the lands to existing services and facilities, and any environmental constraints that may impede or restrict the development of the lands.

Infrastructural assessment and land use evaluation

Roads	Footpath	Water Supply	Waste Water	Compact Growth	Co-ordinated Development
1	1	1	1	✘	✔

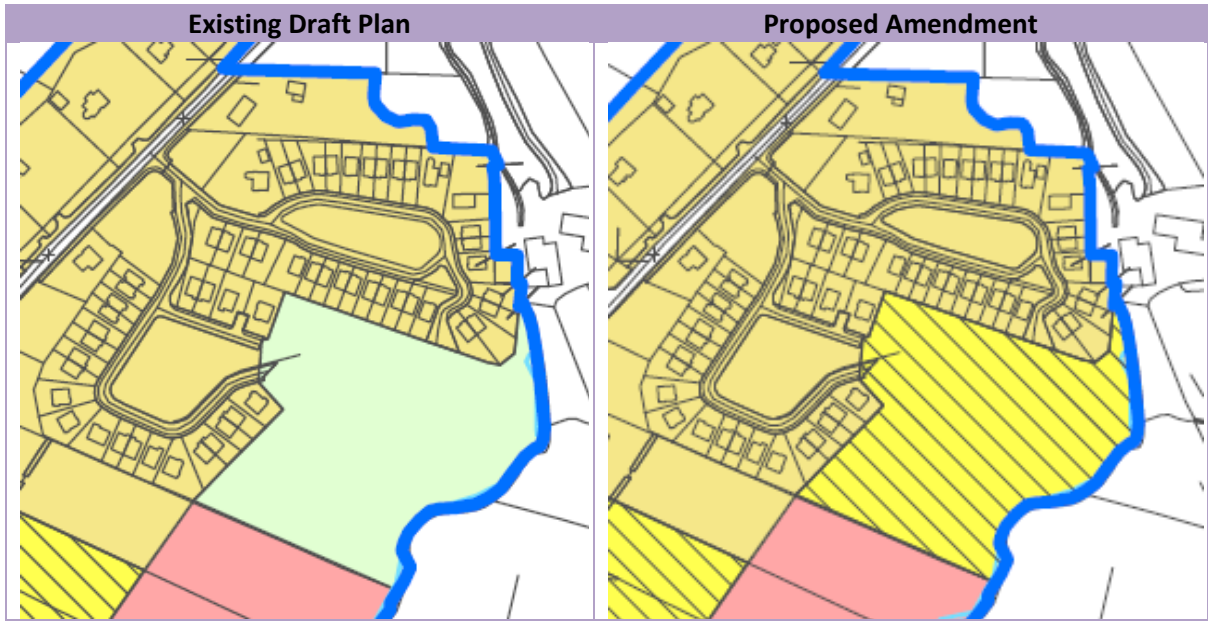
The proposal to zone these lands would facilitate the extension of the existing residential development, Gleann Dara, which could be considered as co-ordinated development. Given the distance of the lands from the centre of the Plan area (approximately 800m), the application of the sequential approach must be undertaken. The sequential approach would provide that the zoning of lands shall extend outwards from the centre of an urban area with undeveloped lands closest to the core and on public transport routes being given preference, encouraging infill opportunities, and that areas to be zoned shall be contiguous to existing zoned development lands. It is accepted that there are other sites proposed for zoning for residential purposes which may be slightly closer to the town, to the N16 which is the primary transport corridor through the town and closer to the national and second level schools. However, these sites have other issues in relation to access / footpath connectivity, potential to impact on residential amenities of adjoining developments or unfavourable topographical considerations. In comparison, no such issues arise noting that the Council proposes to complete the footpath / street lighting along the Skreeny Road with the Part 8 public consultation having been approved earlier this year. Furthermore, Gleann Dara was completed by the funding bank to the satisfaction of the Council and is in charge by the Council along with Skreeny Manor. As a result it is considered appropriate to zone these lands for residential purposes.

By designating additional residential zoning on these lands, it would facilitate an increase in the yield of housing units for Manorhamilton from the Core Strategy (Table 2.6 refers) contained in the Draft Plan. The increase is not considered to such an extent that would require a reduction / realignment of the allocations available to other towns, villages and rural areas in the county to be reconsidered. It also has regard to the positioning of Manorhamilton in the settlement hierarchy. It is considered that such scope is provided for under the ‘Development Plan Guidelines for Planning Authorities’ (June 2022) in Section 4.4.3 ‘Ensuring Sufficient Provision of Housing Lands/Sites’ for such an approach. The yield of this and all other such sites have been included in the revised Table 2.6 of the Core Strategy recommended in the Chief Executive’s Report (Recommendation no. 117 refers).

Chief Executive’s Recommendation

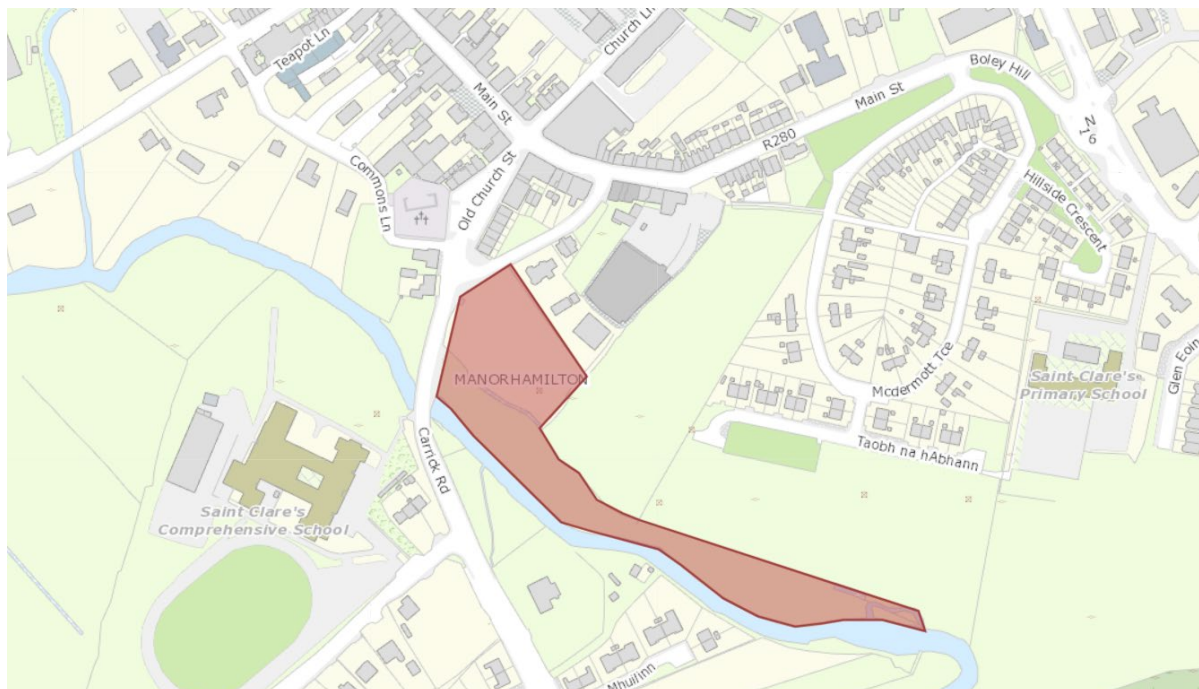
Recommendation No. 128:

Amend the land use zoning objective from *Agriculture* to *Low Density Residential* on lands outlined in the submission.



Submission no.	DLCDP-12
Submitted by:	Shane Kerrigan
Theme (s):	Zoning - Manorhamilton

Map showing lands subject to Submission:



Summary of Submission:

The submission relates to lands in the townland of Manorhamilton within the settlement boundary of Manorhamilton. The site was zoned *New Residential* and *Open Space & Amenity* land use zoning objective in the Draft Plan. It is requested to zone the lands for mixed use/open space purposes over a similar area that was zoned in the Leitrim County Development Plan 2015-2021.

Chief Executive’s Response:

The extent of the lands designated *Open Space & Amenity* land use zoning objective coincide with areas identified as being within Flood Zones A and B and, more specifically, the Lough Gill Special Area of Conservation (Site Code 001976). Given the proximity of the Owenmore River and the fact that lands lie within a designated area, a more compatible and less-vulnerable land use designation is required at this location lands and it is considered that the *Open Space & Amenity* land use zoning objective is appropriate in this instance. The only acceptable alternative land use would be *Agricultural* as part of the Appropriate Assessment considerations would be to ensure that there is no loss of designated habitat arising from a proposed development. The consideration of an alternative land use cannot therefore be supported.

As part of this evidence-based approach to the identification of lands for residential development, an Infrastructural Assessment and Land Use Evaluation was carried out. This assessment is based on a range of criteria including infrastructure availability/constraints, the proximity of the lands to existing services and facilities, and any environmental constraints that may impede or restrict the development of the lands.



Infrastructural assessment and land use evaluation

Roads	Footpath	Water Supply	Waste Water	Compact Growth	Co-ordinated Development
1	1	1	1	✓	✗

Chief Executive's Recommendation

No change to the Draft Plan.

Submission no.	DLCDP-15
Submitted by:	Silverfern Properties Ltd.
Theme (s):	Zoning - Manorhamilton

Map showing lands subject to Submission:



Summary of Submission:

The submission relates to lands in the townland of Manorhamilton within the settlement boundary of Manorhamilton. The site was zoned *Primary Residential (Undeveloped)* land use zoning objective in the Leitrim County Development Plan 2015-2021 and was zoned *New Residential* and *Open Space & Amenity* land use zoning amenity in the Draft Plan. It is requested to zone the lands for mixed use to allow for expansion of the existing facility.

Chief Executive’s Response:

The majority of the subject lands are proposed to be zoned *Open Space & Amenity* (northern section) with the southern section of the lands designated *New Residential* under the Draft Plan. The subject lands are zoned *Primarily Residential (undeveloped)* in the current Leitrim County Development Plan 2015-2021. The submission requests that the *Open Space & Amenity* area be zoned *Mixed Use* with a view to initially extending the existing car parking area of the adjoining SuperValu supermarket and its potential further expansion. It should be noted that as per the land use zoning matrix outlined in Table 6.5 of the Draft Plan, car parking is ‘*open for consideration*’ under the *Open Space & Amenity* land use zoning objective.

As part of this evidence-based approach to the identification of lands for development an Infrastructural Assessment and Land Use Evaluation was carried out. This assessment is based on a range of criteria including infrastructure availability/constraints, the proximity of the lands to existing services and facilities, and any environmental constraints that may impede or restrict the development of the lands. The proposed lands are constrained in terms of their levels which fall substantially from the northeast adjacent to McDermott Terrace to the southwest adjacent to the existing SuperValu complex. In light of the levels that exist on these lands and difficulty in assimilating

a development into the receiving landscape, it is considered that the *Open Space & Amenity* zoning is appropriate in this instance.

Infrastructural assessment and land use evaluation

Roads	Footpath	Water Supply	Waste Water	Compact Growth	Co-ordinated Development
1	1	1	1	✓	✗

It is noted that there is a current planning application on part of the subject lands seeking planning permission to develop a car park.

Chief Executive’s Recommendation

No change to the Draft Plan.

Submission no.	DLCDP-33
Submitted by:	Gerard Mc Partlan
Theme (s):	Zoning - Manorhamilton

Map showing lands subject to Submission:



Summary of Submission:

The submission relates to lands in the townland of Manorhamilton within the settlement boundary of Manorhamilton. The site was zoned as zoned *New Residential* and *Open Space & Amenity* in the Draft Plan. It is requested to zone the lands for residential/mixed use with open space amenity along the riverside.

Chief Executive’s Response:

The plot of land identified measures approximately 3.7 ha in size, of which approximately 1.8 ha is zoned as *New Residential* in the Draft Plan. In terms of potential residential yield, the Core Strategy of the Draft Plan has identified possible densities of 20 units/ha for residential lands and 10 units/ha for low density/infill sites. If the entirety of the proposed site was zoned for residential purposes, it would equate to the provision of 74 no. residential units.

By designating additional residential zoning on these lands, it would necessitate an allocation of housing units from the Core Strategy and as a result would reduce the allocations available to other towns, villages and rural areas in the county. It is considered that the approach taken in the Core Strategy outlines the most sustainable and balanced approach to the future development of both the urban and rural areas of the county, and in respect of Manorhamilton, the approach is consistent with the established pattern and character of the area.

In determining the amount of lands to be zoned for residential and open space purposes at this location, the lands designated *Open Space & Amenity* coincide with the lands identified as the Lough Gill Special Area of Conservation (Site Code 001976). Given the proximity of the Owenmore River and the fact that lands lie within a designated area, a more compatible and less-vulnerable land use designation is required at this location. It is considered that the *Open Space & Amenity* zoning is appropriate in this instance. The only acceptable alternative use would be *Agricultural* use as part of

the Appropriate Assessment considerations would be to ensure that there is no loss of designated habitat arising from a proposed development.

As part of this evidence-based approach to the identification of lands for development an Infrastructural Assessment and Land Use Evaluation was carried out. This assessment is based on a range of criteria including infrastructure availability/constraints, the proximity of the lands to existing services and facilities, and any environmental constraints that may impede or restrict the development of the lands.

Infrastructural assessment and land use evaluation

Roads	Footpath	Water Supply	Waste Water	Compact Growth	Co-ordinated Development
1	1	1	1	✘	✔

In conclusion the quantum of residential land identified for development has to be aligned with the housing demand for each settlement as set out in the Core Strategy. The identification of any additional lands would result in the Plan being inconsistent with the Core Strategy and national and regional policy.

Chief Executive’s Recommendation

No change to the Draft Plan.

Submission no.	DLCDP-56
Submitted by:	Hubert McTiernan
Theme (s):	Zoning - Manorhamilton

Map showing lands subject to Submission:



Summary of Submission:

The submission relates to lands in the townland of Skreeny (ROSCLOGHER By) within the settlement boundary of Manorhamilton. The site was zoned as *Primarily Residential* in the Leitrim County Development Plan 2015-2021 and as *Low Density Residential* in the Draft Plan. It is requested to zone the lands as *New Residential*.

Chief Executive’s Response:

Residential development in the vicinity of the proposed site is generally characterised by single dwellings on individual sites, and low-density multi-unit residential development.

The plot of land identified measures approximately 0.5 ha in size. In terms of potential residential yield, the Core Strategy of the Draft Plan has identified possible densities of 20 units/ha for residential lands and 10 units/ha for low density/infill sites. If the proposed site was zoned for residential purposes, it would equate to the provision of 10 no. residential units. If a low-density residential zoning were applied, it would equate to the provision of circa 5 no. residential units.

By designating residential zoning on these lands, it would necessitate a marginal increase in the allocation of housing units from the Core Strategy. It is considered that the approach taken in the Core Strategy outlines the most sustainable and balanced approach to the future development of both the urban and rural areas of the county, and in respect of Manorhamilton, the approach is consistent with the established pattern and character of the area.

As part of this evidence-based approach to the identification of lands for residential development an Infrastructural Assessment and Land Use Evaluation was carried out. This assessment is based on a range of criteria including infrastructure availability/constraints, the proximity of the lands to existing

services and facilities, and any environmental constraints that may impede or restrict the development of the lands.

Infrastructural assessment and land use evaluation

Roads	Footpath	Water Supply	Waste Water	Compact Growth	Co-ordinated Development
1	1	1	1	✓	✓

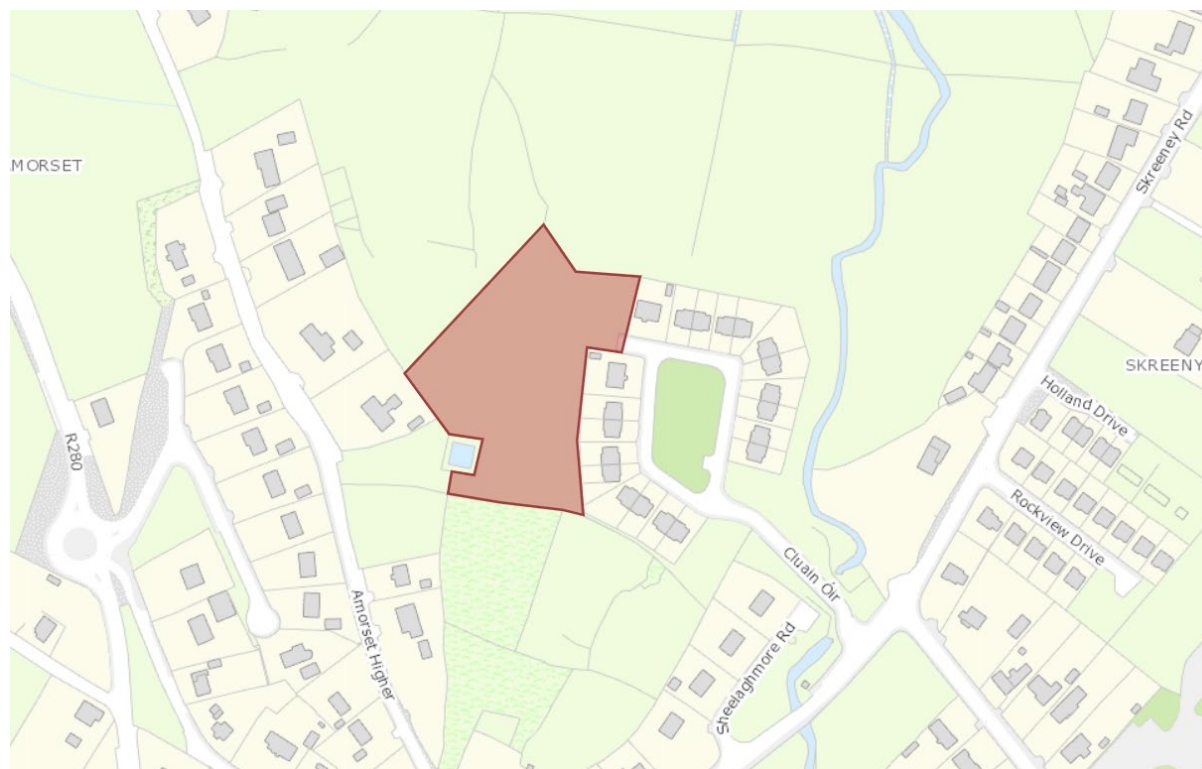
In conclusion the zoning on the lands as per the Draft Plan allows for *Low Density Residential* development. With regard to the existing pattern of development as well as the orientation of development on adjoining lands, it is considered that the zoning as outlined in the Draft is the most appropriate for this location.

Chief Executive’s Recommendation

No change to the Draft Plan.

Submission no.	DLCDP-86
Submitted by:	Desmond McDermott
Theme (s):	Zoning - Manorhamilton

Map showing lands subject to Submission:



Summary of Submission:

The submission relates to lands in the townland of Amorset within the settlement boundary of Manorhamilton. The site was zoned as zoned *Residential Reserve/Support* in the Leitrim County Development Plan 2015-2021 and was zoned *Agriculture* in the Draft Plan. It is requested to zone the lands for residential use as an extension to the existing residential development, Cluain Óir.

Chief Executive’s Response:

The plot of land identified measures approximately 1.1 ha in size. In terms of potential residential yield, the Core Strategy of the Draft Plan has identified possible densities of 20 units/ha for residential lands and 10 units/ha for low density/infill sites. If the proposed site was zoned for residential purposes, it would equate to the provision of 22 no. residential units. If a low-density residential zoning were applied, it would equate to the provision of 11 no. residential units.

As part of this evidence-based approach to the identification of lands for residential development an Infrastructural Assessment and Land Use Evaluation was carried out. This assessment is based on a range of criteria including infrastructure availability/constraints, the proximity of the lands to existing services and facilities, and any environmental constraints that may impede or restrict the development of the lands.

Infrastructural assessment and land use evaluation

Roads	Footpath	Water Supply	Waste Water	Compact Growth	Co-ordinated Development
1	1	1	1	✓	✓

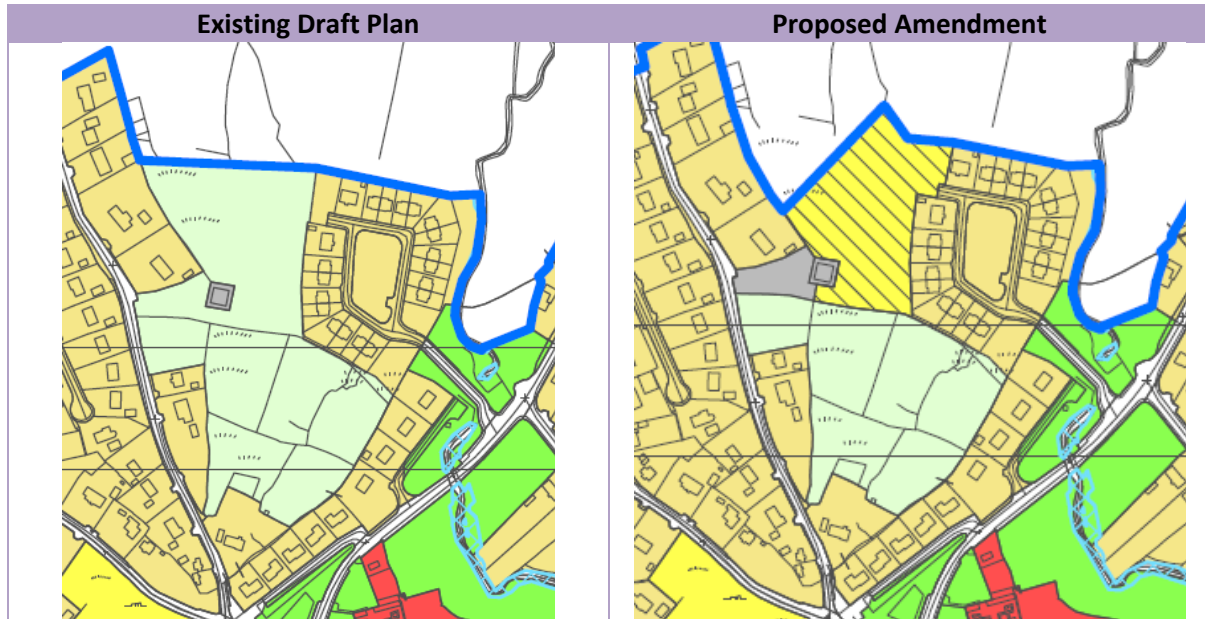
The proposal to zone these lands would facilitate the extension of the existing residential development, Cluain Óir, which could be considered as co-ordinated development. Given the distance of the lands from the centre of the Plan area (approximately 500m), the application of the sequential approach must be undertaken. The sequential approach specifies that the zoning of lands shall extend outwards from the centre of an urban area with undeveloped lands closest to the core and on public transport routes being given preference, encouraging infill opportunities, and that areas to be zoned shall be contiguous to existing zoned development lands. It is accepted that there are other sites proposed for zoning for residential purposes which may be slightly closer to the town, to the N16 which is the primary transport corridor through the town and closer to the national and second level schools. However, these sites have other issues in relation to access / footpath connectivity, potential to impact on residential amenities of adjoining developments or unfavourable topographical considerations. In comparison, no such issues arise. Cluain Óir has been completed to a satisfactory standard and although not taken in charge by the Council, the security in the form of a bond was released a number of years ago with the Council retaining a smaller contingency security. The owner of the lands adjoining Cluain Óir is the same individual who developed and owns the access road and services within the development. As a result it is considered appropriate to zone these lands for residential purposes.

By designating additional residential zoning on these lands, it would facilitate an increase in the yield of housing units for Manorhamilton from the Core Strategy (Table 2.6 refers) contained in the Draft Plan. The increase is not considered to such an extent that would require a reduction / realignment of the allocations available to other towns, villages and rural areas in the county to be reconsidered. It also has regard to the positioning of Manorhamilton in the settlement hierarchy. It is considered that such scope is provided for under the ‘Development Plan Guidelines for Planning Authorities’ (June 2022) in Section 4.4.3 ‘Ensuring Sufficient Provision of Housing Lands/Sites’ for such an approach. The yield of this and all other such sites have been included in the revised Table 2.6 of the Core Strategy recommended in the Chief Executive’s Report (Recommendation no. 117 refers).

Chief Executive’s Recommendation

Recommendation No. 129:

Change the land use zone from *Agriculture* to *New Residential* on lands outlined in red on the map titled “Figure 1” submitted with the submission.



7.4 Dromahair

Submission no.	DLCDP-20
Submitted by:	Mary Flanagan & Michael Brady
Theme (s):	Zoning - Dromahair

Map showing lands subject to Submission:



Summary of Submission:

The submission relates to lands in the townlands of Drumahaire and Mullagh (Drumahaire By) within the settlement boundary of Dromahair. The site was zoned as zoned *Primary Residential (Undeveloped), Residential Reserve/Support* and *Open Space & Amenity* in the Leitrim County Development Plan 2015-2021 and was zoned *Agriculture* and *Open Space/Amenity* in the Draft Plan. It is requested to zone the lands for residential use / mixed use.

Chief Executive’s Response:

The plot of land identified measures approximately 5.18 ha in size. In terms of potential residential yield, the Core Strategy of the Draft Plan has identified possible densities of 15 units/ha for residential lands and 10 units/ha for low density/infill sites. The amount of lands that were previously zoned for residential purposes is approximately 0.787 ha. If this area alone of the site was zoned for residential purposes, it would equate to the provision of 78 no. residential units. If a low-density residential zoning were applied, it would equate to the provision of 52 no. residential units.

By designating residential zoning on these lands, it would necessitate an allocation of housing units from the Core Strategy and as a result would reduce the allocations available to other towns, villages and rural areas in the county. It is considered that the approach taken in the Core Strategy outlines the most sustainable and balanced approach to the future development of both the urban and rural areas of the county. The Planning Authority has also attempted to ensure a similar amount of land is identified for residential purposes in all settlements within the same tier, in this instance Tier 2B ‘Support Towns’.

As part of this evidence-based approach to the identification of lands for residential development an Infrastructural Assessment and Land Use Evaluation was carried out. This assessment is based on a

range of criteria including infrastructure availability/constraints, the proximity of the lands to existing services and facilities, and any environmental constraints that may impede or restrict the development of the lands.

Infrastructural assessment and land use evaluation

Roads	Footpath	Water Supply	Waste Water	Compact Growth	Co-ordinated Development
1	2	1	1	x	x

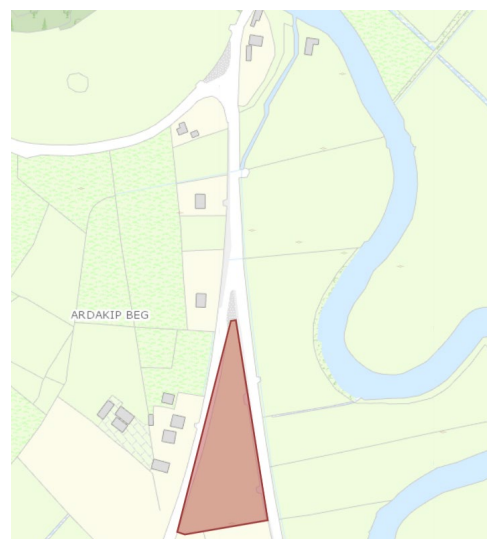
In conclusion, the quantum of residential land identified for development has to be aligned with the housing provision for each settlement as set out in the Core Strategy. The identification of any additional lands would result in the Plan being inconsistent with the Core Strategy and national and regional policy. There is no justification therefore to zone the proposed lands for residential use within the Draft Plan. The location of the site at a remove from the town centre would not be suitable for consideration of a *Mixed Use* zoning. The Planning Authority also had regard to the previous refusal of planning permission on the element of the land which was zoned for residential purposes in the current County Development Plan.

Chief Executive’s Recommendation

No change to the Draft Plan.

Submission no.	DLCDP-180
Submitted by:	Fergus McGowan
Theme (s):	Zoning - Dromahair

Map showing lands subject to Submission:



Summary of Submission:

The submission relates to lands on three different sites in the townlands of Drumahaire within the settlement boundary of Dromahair and Ardakup Beg to the south of the settlement boundary as identified in the Draft Plan. The sites were zoned as zoned *Primary Residential, Mixed Use, Open Space & Amenity* and *Enterprise and Employment* in the Leitrim County Development Plan 2015-2021 and were zoned *Mixed Use* and *Open Space* in the Draft Plan. The lands previously zoned for *Enterprise and Employment* are now outside the revised settlement boundary and are not zoned. It is requested to zone the lands for tourism use and extend the settlement boundary to include the lands at Ardakup Beg and zone accordingly as *Enterprise and Employment* land use.

Chief Executive’s Response:

The policy support for tourism is outlined in Volume 1, Chapter 5 (Tourism) of the Draft Plan, in which a policy context for the planning and sustainable development of tourism and tourism assets within the county is provided. The Draft Plan strongly supports sustainable tourism development within the county and there is policy support in relation to holiday accommodation and encouragement of sustainable tourism enterprise development.

The policy support for tourism in Dromahair is further outlined in section 4.11 of Volume II of the Draft Plan and *Opportunity Sites* have been identified with this in mind. One of the plots of land outlined in the submission is identified as *Opportunity Site 2* to the northwest of the former Abbey Manor Hotel. The lands are zoned as *Mixed Use* in the Draft Plan which allows for a number of varied developments however, given the proposals outlined in the submission, it is considered appropriate to zone these lands for tourism purposes.

With regard to rezoning the lands along the riverbank, it should be noted that these lands are currently zoned for *Open Space* and *Mixed Use*, in which tourism development is acceptable in principle. The provision of camping/caravan parks are open for consideration in lands zone for *Open Space* and as a result it is considered that the zoning should be retained as shown in the Draft Plan.

In relation to the lands located in the townland of Ardakup Beg to the south of the settlement boundary, it is noted that the lands in question are approximately 300m from the new settlement boundary as defined in the Draft Plan. A key principle of the NPF and RSES is to promote consolidation of existing settlements and more compact forms of growth. As such, it is an objective of the Draft Plan, in line with national and regional policy, to facilitate infill and brownfield development within the existing built footprint of urban settlements. This greenfield site on the periphery of the settlement boundary does not provide for brownfield development or the sequential development of the town and in this regard, it is not considered that the proposed lands, in this instance, fulfil this objective. Should the owner propose to develop the subject lands for this purpose, the lands have been identified with an appropriate land use zoning objective since early 2015 with no proposal brought forward through the planning permission consent process. This option remains available to the landowner before the end of March 2023.

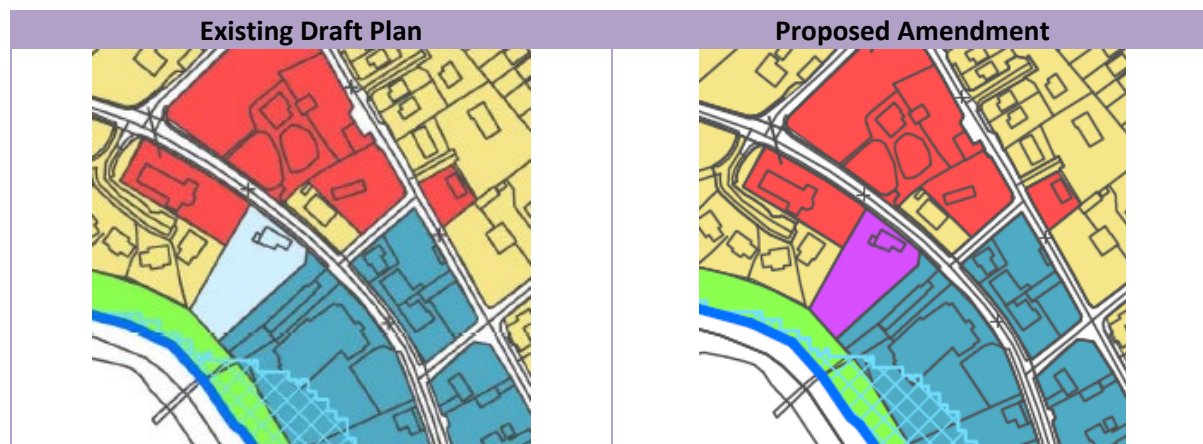
Infrastructural assessment and land use evaluation

Roads	Footpath	Water Supply	Waste Water	Compact Growth	Co-ordinated Development
1	1	1	1	✗	✗

Chief Executive’s Recommendation

Recommendation No. 130:

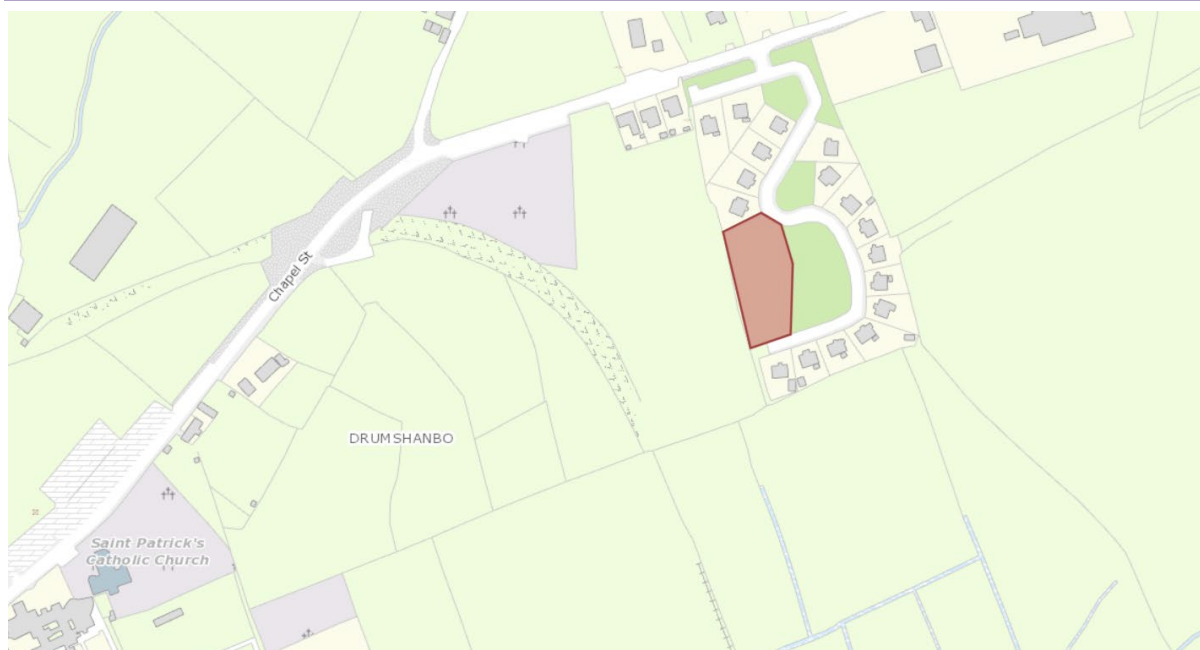
Change the land use zone from *Mixed Use* to *Tourism* on lands adjoining the former Abbey Manor Hotel as outlined in the submission.



7.5 Drumshanbo

Submission no.	DLCDP-9
Submitted by:	Paddy Mc Manus & Alan Foley
Theme (s):	Zoning - Drumshanbo

Map showing lands subject to Submission



Summary of Submission:

The submission relates to lands in the townland of Drumshanbo outside the settlement boundary of Drumshanbo. It is requested to extend the settlement boundary and zone the lands for residential use.

Chief Executive’s Response:

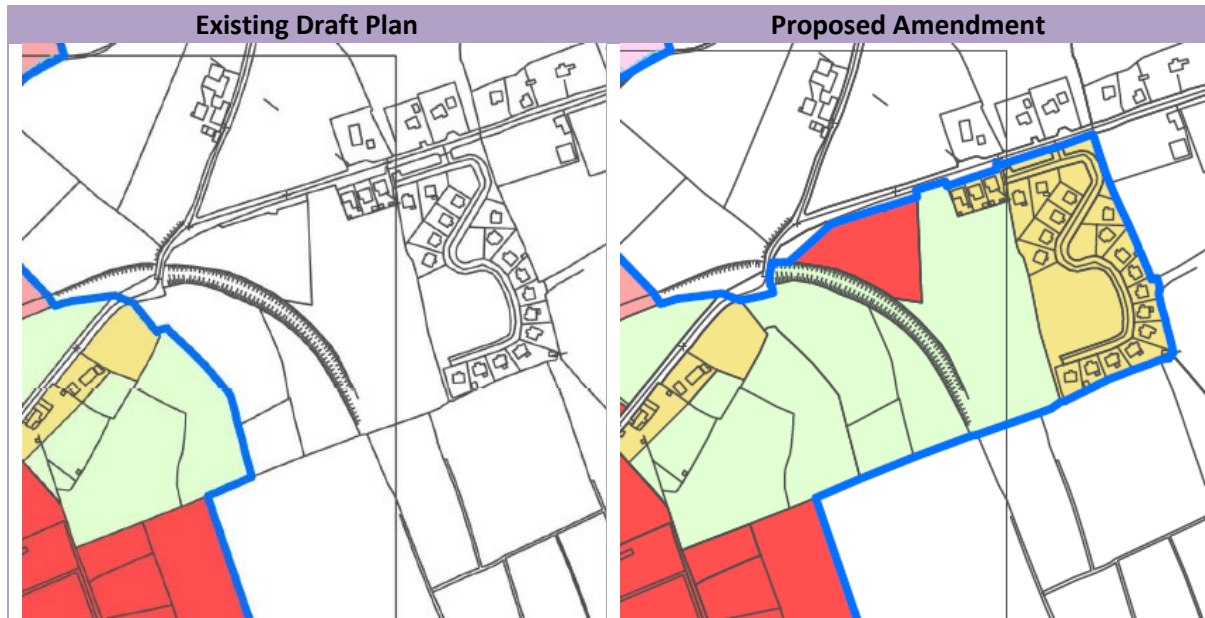
The lands as outlined in the submission are located within an existing residential development, Mountain View, to the northeast of Drumshanbo. It is also noted that this residential development is adjacent to a number of other individual residential properties fronting onto the Regional Road. It is considered appropriate to extend the settlement boundary to include the residential development and zone as *Existing Residential*. This will also involve the zoning of adjacent lands as *Agriculture* and the existing graveyard as *Social and Community* use. This will allow the development to be completed noting that an extension is required to the public footpath beyond the graveyard to connect Mountain View to the existing footpath network in the town. A specific objective shall be included in the Settlement Plan for Drumshanbo to this effect which shall be linked to permission being granted to complete this development. All other services are available within the housing development and it is considered that there is the potential to deliver an additional 5-6 no. houses whilst still providing and adequate area of open space for the residents to enjoy.

Infrastructural assessment and land use evaluation

Roads	Footpath	Water Supply	Waste Water	Compact Growth	Co-ordinated Development
1	2	1	1	✘	✔

Chief Executive's Recommendation

Recommendation No. 131: Extend the settlement boundary to include the Mountain View development and zone these lands as *Existing Residential* and lands between this and the settlement boundary to be zoned as *Agriculture* and the graveyard as *Social and Community*.

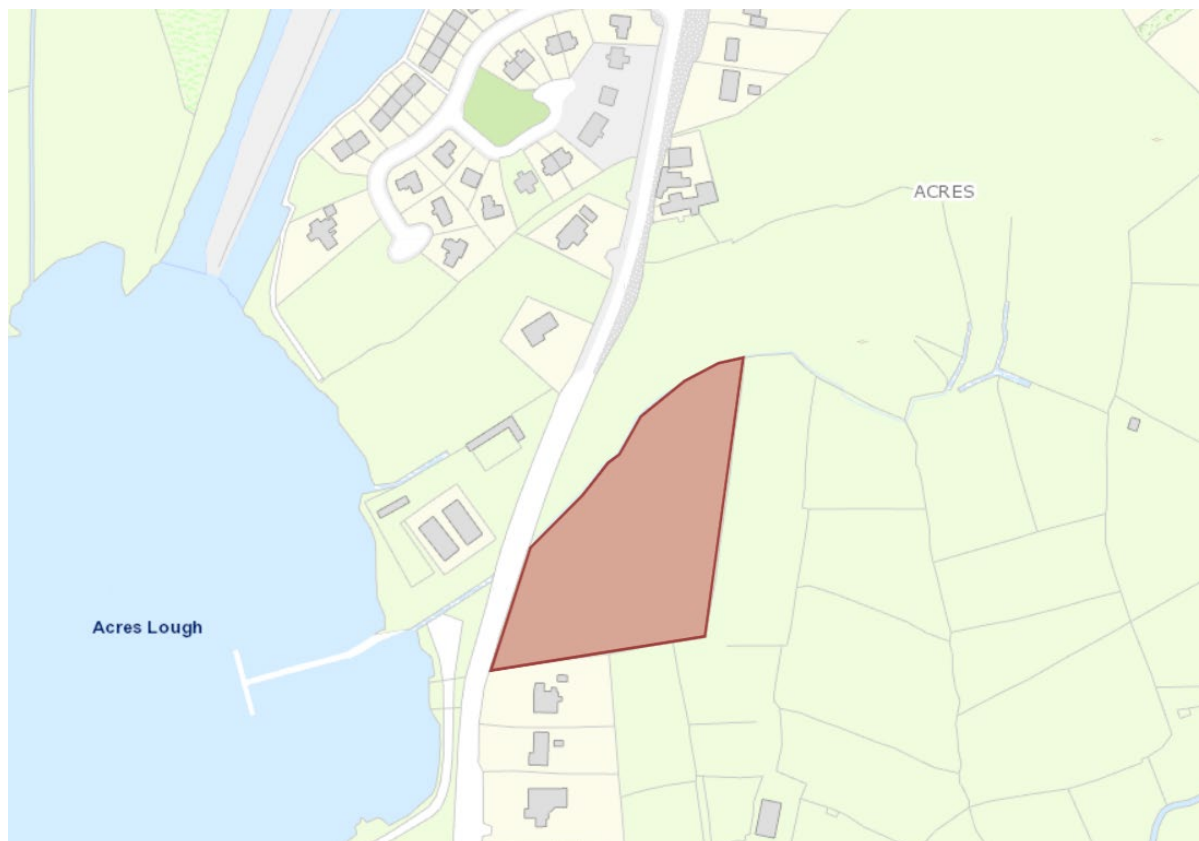


Recommendation No. 132: Insert the following objective into the Drumshanbo Settlement Plan in Section 5 of Volume II of the Draft Plan and renumber subsequent objectives accordingly:

DSO 24: Provide a footpath including enhanced public lighting linking Mountain View housing development to the existing footpath network of the town in conjunction with the completion of Mountain View housing development.

Submission no.	DLCDP-11
Submitted by:	Vincent Rogan
Theme (s):	Zoning - Drumshanbo

Map showing lands subject to Submission:



Summary of Submission:

The submission relates to lands in the townland of Drumduff North outside the settlement boundary of Drumshanbo. It is requested to extend the settlement boundary and zone the lands for residential use.

Chief Executive’s Response:

The plot of land identified measures approximately 1.1 ha in size. In terms of potential residential yield, the Core Strategy of the Draft Plan has identified possible densities of 15 units/ha for residential lands and 10 units/ha for low density/infill sites. If the proposed site was zoned for residential purposes, it would equate to the provision of 17 no. residential units. If a low-density residential zoning were applied, it would equate to the provision of 11 no. residential units.

By designating residential zoning on these lands, it would necessitate an allocation of housing units from the Core Strategy and as a result would reduce the allocations available to other towns, villages and rural areas in the county. It is considered that the approach taken in the Core Strategy outlines the most sustainable and balanced approach to the future development of both the urban and rural areas of the county. The Planning Authority has also attempted to ensure a similar amount of land is identified for residential purposes in all settlements within the same tier, in this instance Tier 2B ‘Support Towns’.

Having regard to the distance of the lands from the centre of the Plan area, a ‘Residential’ zoning would not be consistent with the required application of the sequential approach. The lands are not currently needed to satisfy residential land requirements for the household allocation for Drumshanbo provided for in the Core Strategy.

As part of this evidence-based approach to the identification of lands for residential development, an Infrastructural Assessment and Land Use Evaluation was carried out. This assessment is based on a range of criteria including infrastructure availability/constraints, the proximity of the lands to existing services and facilities, and any environmental constraints that may impede or restrict the development of the lands.

Infrastructural assessment and land use evaluation

Roads	Footpath	Water Supply	Waste Water	Compact Growth	Co-ordinated Development
1	1	1	1	✘	✘

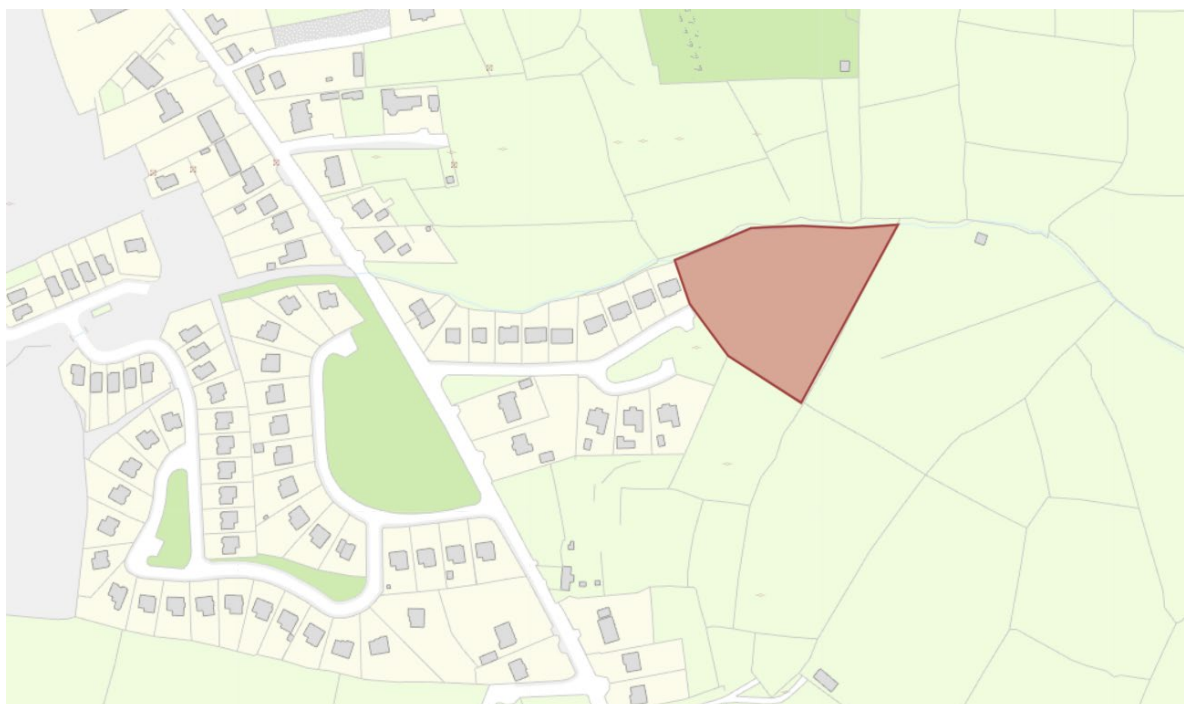
Having regard to the distance of the lands from the centre of the Plan area, a ‘Residential’ zoning would not be consistent with the required application of the sequential approach. The lands are not currently needed to satisfy residential land requirements. There is no justification therefore to zone the proposed lands for residential use within the Draft Plan.

Chief Executive’s Recommendation

No change to the Draft Plan.

Submission no.	DLCDP-31
Submitted by:	Gerry Beirne
Theme (s):	Zoning - Drumshanbo

Map showing lands subject to Submission:



Summary of Submission:

The submission relates to lands in the townland of Drumcoora (Leitrim By) outside the settlement boundary of Drumshanbo. It is proposed to extend the settlement boundary and zone the lands for residential use.

Chief Executive’s Response:

The plot of land identified measures approximately 1 ha in size. In terms of potential residential yield, the Core Strategy of the Draft Plan has identified possible densities of 15 units/ha for residential lands and 10 units/ha for low density/infill sites. If the proposed site was zoned for residential purposes, it would equate to the provision of 15 no. residential units. If a low-density residential zoning were applied, it would equate to the provision of 10 no. residential units.

As part of this evidence-based approach to the identification of lands for residential development an Infrastructural Assessment and Land Use Evaluation was carried out. This assessment is based on a range of criteria including infrastructure availability/constraints, the proximity of the lands to existing services and facilities, and any environmental constraints that may impede or restrict the development of the lands.

Infrastructural assessment and land use evaluation

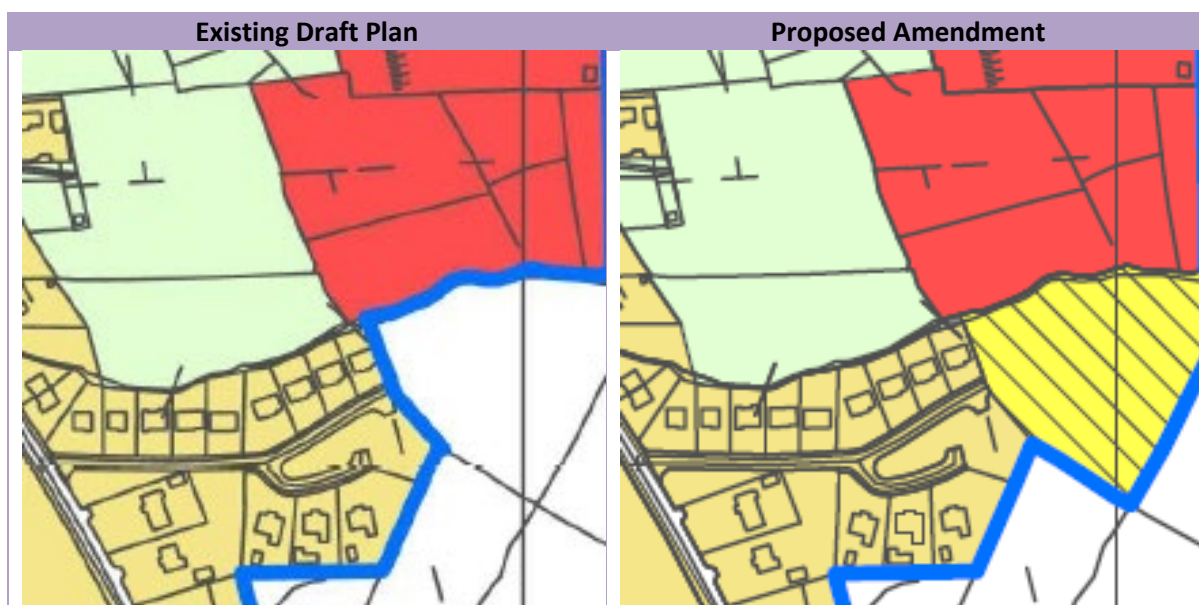
Roads	Footpath	Water Supply	Waste Water	Compact Growth	Co-ordinated Development
1	1	1	1	✘	✔

The proposal to zone these lands would facilitate the extension of the existing ‘Ashdale’ residential development which could be considered as co-ordinated development. Given the distance of the lands from the centre of the Plan area (approximately 600m), the application of the sequential approach must be undertaken. The sequential approach would provide that the zoning of lands shall extend outwards from the centre of an urban area with undeveloped lands closest to the core and on public transport routes being given preference, encouraging infill opportunities, and that areas to be zoned shall be contiguous to existing zoned development lands. As the development benefits from all existing services available within the Ashdale housing development, it is considered reasonable to extend the land use zoning in this instance. As a result it is considered appropriate to zone these lands for residential purposes.

By designating additional residential zoning on these lands, it would facilitate an increase in the yield of housing units for Drumshanbo from the Core Strategy (Table 2.6 refers) contained in the Draft Plan. The increase is not considered to such an extent that would require a reduction / realignment of the allocations available to other towns, villages and rural areas in the county to be reconsidered. It also has regard to the positioning of Drumshanbo in the settlement hierarchy. It is considered that such scope is provided for under the ‘*Development Plan Guidelines for Planning Authorities*’ (June 2022) in Section 4.4.3 ‘*Ensuring Sufficient Provision of Housing Lands/Sites*’ for such an approach. The yield of this and all other such sites have been included in the revised Table 2.6 of the Core Strategy recommended in the Chief Executive’s Report (Recommendation No. 117 refers).

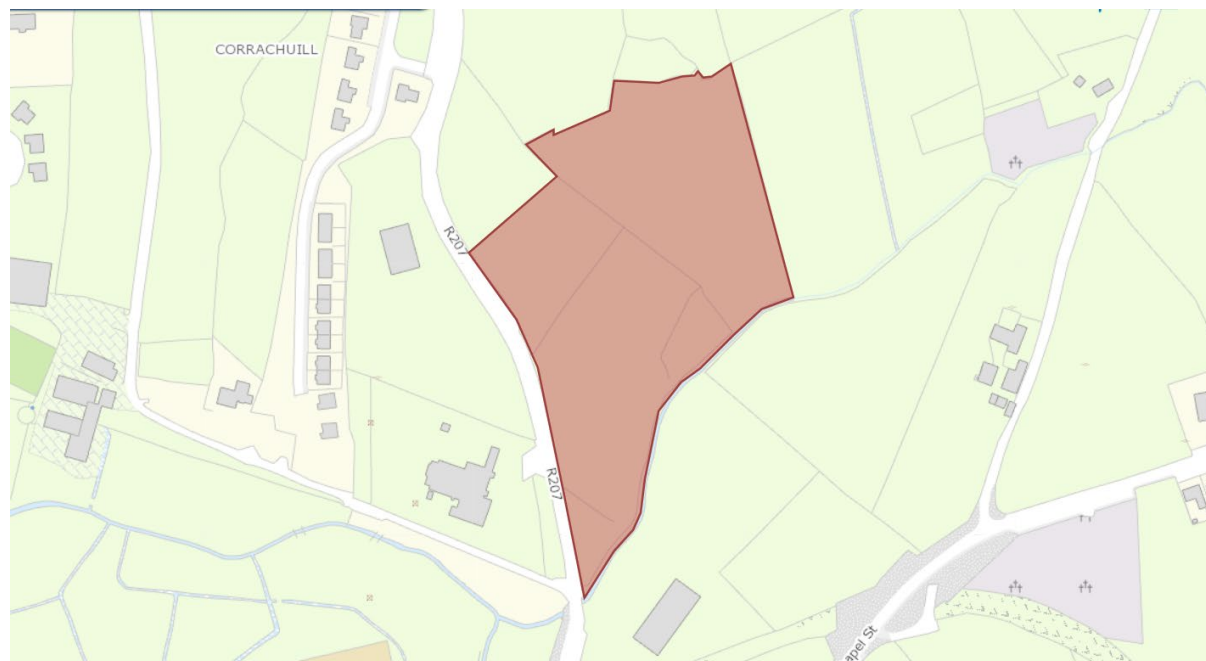
Chief Executive’s Recommendation

Recommendation No. 133: Extend the settlement boundary and zone as *Low Density Residential* the lands outlined in the submission.



Submission no.	DLCDP-43
Submitted by:	Ray Gilmartin
Theme (s):	Zoning - Drumshanbo

Map showing lands subject to Submission:



Summary of Submission:

The submission relates to lands in the townland of Corlough (ED Drumshanbo) within the settlement boundary of Drumshanbo. The site was zoned as zoned *Enterprise and Employment* in the Leitrim County Development Plan 2015-2021 and was similarly zoned *Enterprise and Employment* in the Draft Plan. It is requested to zone the lands for residential use.

Chief Executive’s Response:

The plot of land identified measures approximately 3.5 ha in size. In terms of potential residential yield, the Core Strategy of the Draft Plan has identified possible densities of 15 units/ha for residential lands and 10 units/ha for low density/infill sites. If the proposed site was zoned for residential purposes, it would equate to the provision of 53 no. residential units. If a low-density residential zoning were applied, it would equate to the provision of 35 no. residential units.

By designating residential zoning on these lands, it would necessitate an allocation of housing units from the Core Strategy and as a result would reduce the allocations available to other towns, villages and rural areas in the county. It is considered that the approach taken in the Core Strategy outlines the most sustainable and balanced approach to the future development of both the urban and rural areas of the county, and in respect of Drumshanbo, the approach is consistent with the established pattern and character of the area.

As part of this evidence-based approach to the identification of lands for residential development an Infrastructural Assessment and Land Use Evaluation was carried out. This assessment is based on a range of criteria including infrastructure availability/constraints, the proximity of the lands to existing services and facilities, and any environmental constraints that may impede or restrict the development of the lands.

Infrastructural assessment and land use evaluation

Roads	Footpath	Water Supply	Waste Water	Compact Growth	Co-ordinated Development
1	1	1	1	x	x

Having regard to the distance of the lands from the centre of the Plan area (approximately 400m), a ‘Residential’ zoning would not be consistent with the required application of the sequential approach. The sequential approach would provide that the zoning of lands shall extend outwards from the centre of an urban area with undeveloped lands closest to the core and on public transport routes being given preference, encouraging infill opportunities, and that areas to be zoned shall be contiguous to existing zoned development lands. Furthermore, it is considered that the Enterprise and Employment land use zoning objective is consistent with the predominant use of land adjoining on the Dowra Road. The lands are not currently needed to satisfy residential land requirements. There is no justification therefore to zone the proposed lands for residential use within the Draft Plan.

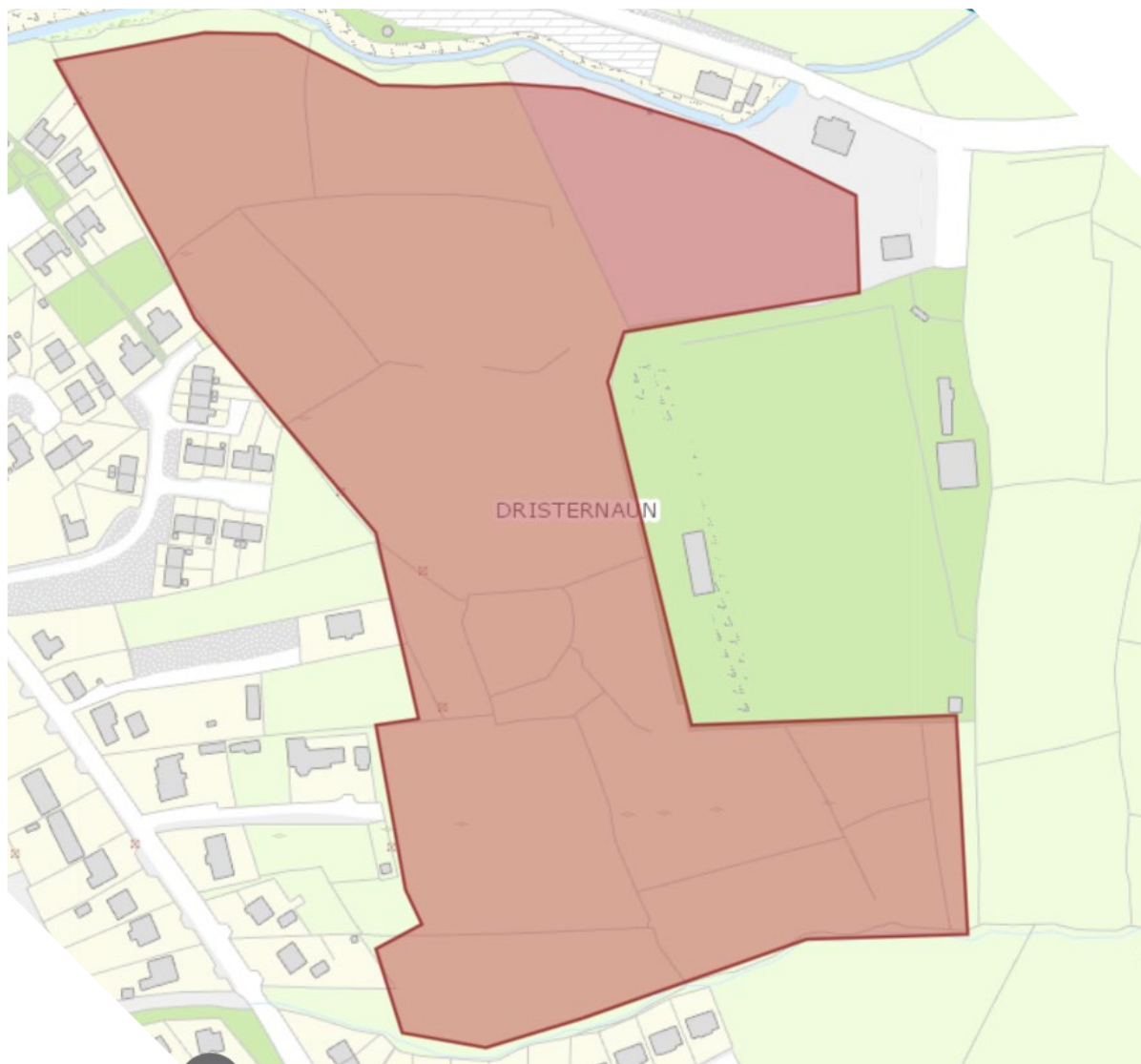
It is noted that these lands were also the subject of consideration as part of the Office of Planning Regulator submission (Section 3.2.4). A separate Recommendation (No. 12) relates to these lands.

Chief Executive’s Recommendation

No change to the Draft Plan. See OPR response (Section 3.2.4) and Recommendation No. 12.

Submission no.	DLCDP-45
Submitted by:	Charlotte McKeon
Theme (s):	Zoning - Drumshanbo

Map showing lands subject to Submission:



Summary of Submission:

The submission relates to lands in the townland of Dristernaun within the settlement boundary of Drumshanbo. The site was zoned as zoned *Residential Reserve/Support* and *Social & Community* in the Leitrim County Development Plan 2015-2021 and was zoned a combination of *Existing Residential*, *Agriculture* and *Social & Community* in the Draft Plan. It is requested to zone the agricultural lands as residential reserve and to change the existing residential to social and community.

Chief Executive’s Response:

With regard to the lands identified as ‘*Existing Residential*’, it is acknowledged that there is no residential use on these lands at present and as a result a change of zoning is appropriate. The submission requests that a *Social & Community* land use zoning be applied to facilitate any potential expansion to the G.A.A. grounds. Given the levels of the lands at this location relative to the actual

GAA pitch / training area, it is considered that the most appropriate expansion to these facilities would occur to the south of the existing facility. As a result, the most appropriate land use zoning to the rear of the existing dwellings which front onto the regional road would be for agriculture and for the lands to the south of the facility to remain as outlined in the Draft Plan.

The submission requests that the lands identified to allow for the expansion of the GAA club to revert to ‘Residential Reserve/Support’. The plot of land identified for residential use measures approximately 7.37 ha in size. In terms of potential residential yield, the Core Strategy of the Draft Plan has identified possible densities of 15 units/ha for residential lands and 10 units/ha for low density/infill sites. If the proposed site was zoned for residential purposes, it would equate to the provision of 111 no. residential units. If a low-density residential zoning were applied, it would equate to the provision of 74 no. residential units.

By designating residential zoning on these lands, it would necessitate an allocation of housing units from the Core Strategy and as a result would reduce the allocations available to other towns, villages and rural areas in the county. It is considered that the approach taken in the Core Strategy outlines the most sustainable and balanced approach to the future development of both the urban and rural areas of the county, and in respect of Drumshanbo, the approach is consistent with the established pattern and character of the area.

As part of this evidence-based approach to the identification of lands for residential development an Infrastructural Assessment and Land Use Evaluation was carried out. This assessment is based on a range of criteria including infrastructure availability/constraints, the proximity of the lands to existing services and facilities, and any environmental constraints that may impede or restrict the development of the lands.

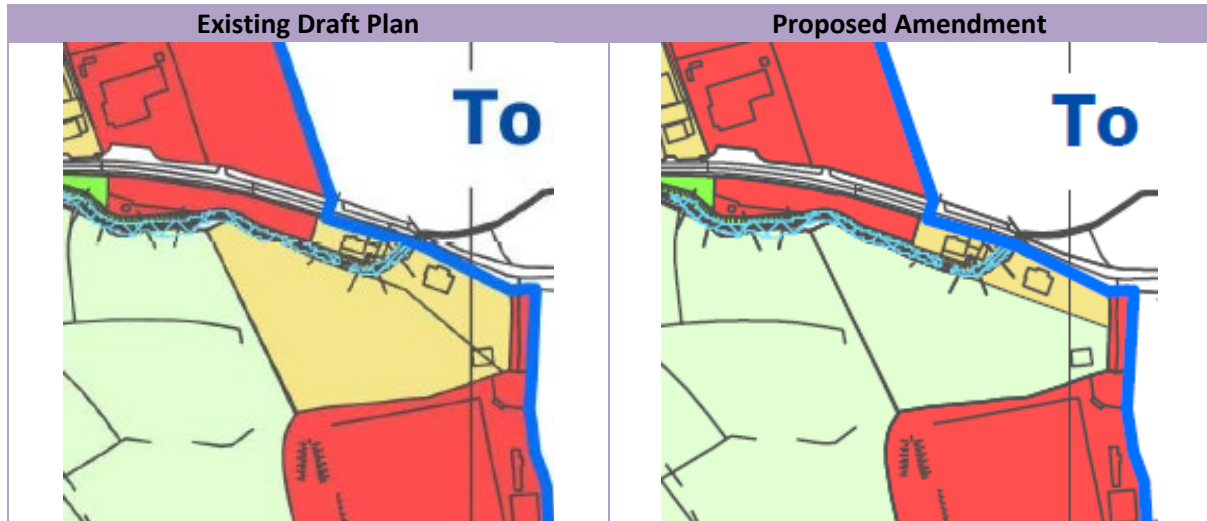
Infrastructural assessment and land use evaluation

Roads	Footpath	Water Supply	Waste Water	Compact Growth	Co-ordinated Development
2	2	2	2	x	x

In conclusion the quantum of residential land identified for development has to be aligned with the housing demand for each settlement as set out in the Core Strategy. The identification of any additional lands would result in the Plan being inconsistent with the Core Strategy and national and regional policy. The lands are not currently needed to satisfy residential land requirements. There is no justification therefore to zone the proposed lands for residential use within the Draft Plan.

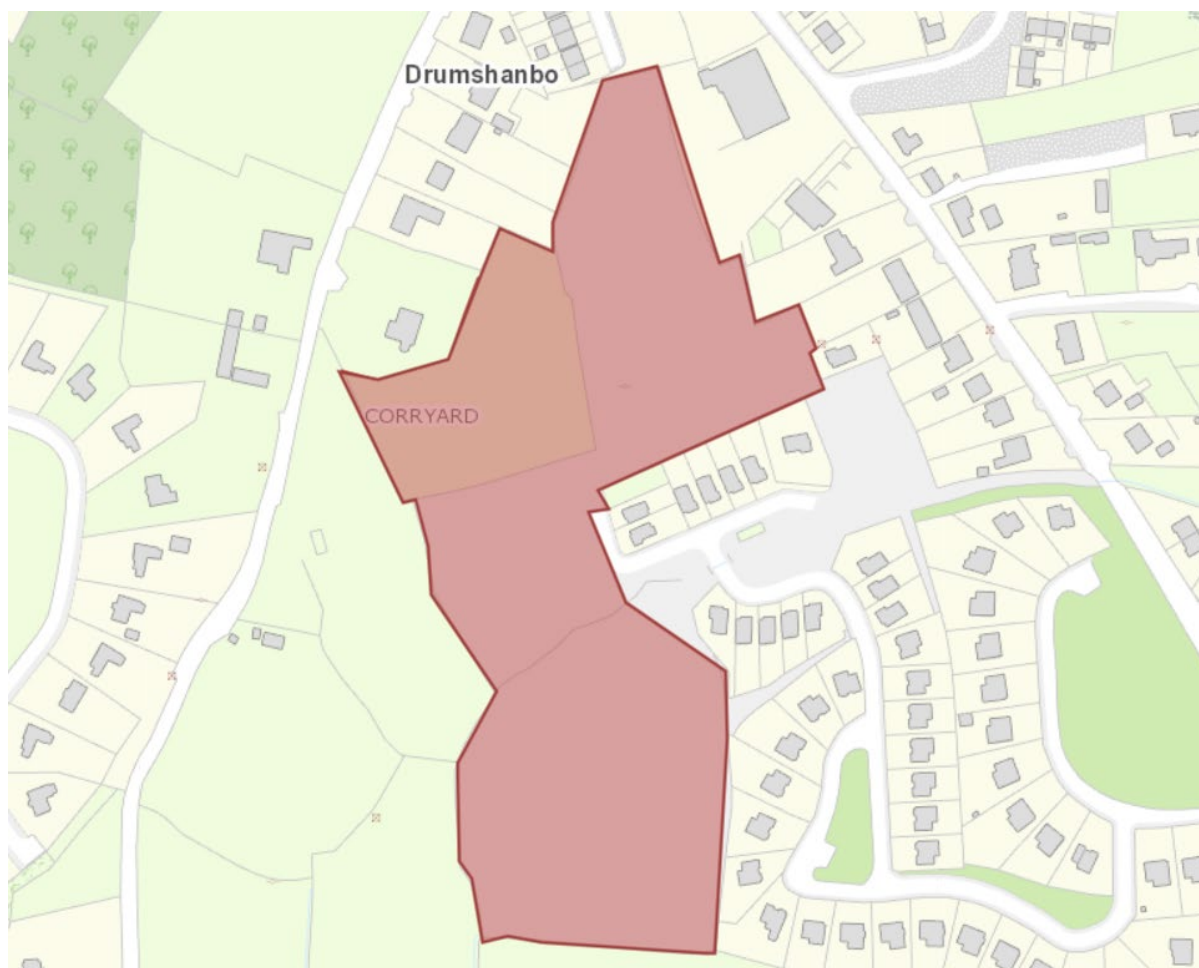
Chief Executive’s Recommendation

Recommendation No. 134: Amend the zoning from *Existing Residential* to *Agriculture* on the lands to the north of the G.A.A. pitch.



Submission no.	DLCDP-46
Submitted by:	Maureen McGourty
Theme (s):	Zoning - Drumshanbo

Map showing lands subject to Submission:



Summary of Submission:

The submission relates to lands in the townlands of Corryard and Drumcoora (Leitrim By) outside the settlement boundary of Drumshanbo. Part of the site was zoned as *Residential Reserve/Support* in the Leitrim County Development Plan 2015-2021 with the remainder outside the settlement boundary. It is requested to extend the settlement boundary to include the lands and zone for residential use.

Chief Executive’s Response:

The plot of land identified for residential use measures approximately 4.2 ha in size. In terms of potential residential yield, the Core Strategy of the Draft Plan has identified possible densities of 15 units/ha for residential lands and 10 units/ha for low density/infill sites. If the proposed site was zoned for residential purposes, it would equate to the provision of 63 no. residential units. If a low-density residential zoning were applied, it would equate to the provision of 42 no. residential units.

By designating residential zoning on these lands, it would necessitate an allocation of housing units from the Core Strategy and as a result would reduce the allocations available to other towns, villages and rural areas in the county. It is considered that the approach taken in the Core Strategy outlines

the most sustainable and balanced approach to the future development of both the urban and rural areas of the county, and in respect of Drumshanbo, the approach is consistent with the established pattern and character of the area. The Planning Authority has also attempted to ensure a similar amount of land is identified for residential purposes in all settlements within the same tier, in this instance Tier 2B ‘Support Towns’.

As part of this evidence-based approach to the identification of lands for residential development an Infrastructural Assessment and Land Use Evaluation was carried out. This assessment is based on a range of criteria including infrastructure availability/constraints, the proximity of the lands to existing services and facilities, and any environmental constraints that may impede or restrict the development of the lands.

Infrastructural assessment and land use evaluation

Roads	Footpath	Water Supply	Waste Water	Compact Growth	Co-ordinated Development
1	1	1	1	✓	✗

In conclusion the quantum of residential land identified for development has to be aligned with the housing demand for each settlement as set out in the Core Strategy. The identification of any additional lands would result in the Plan being inconsistent with the Core Strategy and national and regional policy. There is no justification therefore to zone the proposed lands for residential use within the Draft Plan.

Chief Executive’s Recommendation

No change to the Draft Plan.

7.6 Kinlough

Submission no.	DLCDP-34
Submitted by:	Marion and James Kelly
Theme (s):	Zoning - Kinlough

Map showing lands subject to Submission:



Summary of Submission:

The submission relates to lands in the townland of Gubacreeny outside the settlement boundary of Kinlough. The site was not zoned in the Leitrim County Development Plan 2015-2021 and is outside the settlement boundary for Kinlough as identified in the Draft Plan. It is requested to extend the boundary of the plan boundary and to zone the lands for residential use.

Chief Executive’s Response:

The plot of land identified measures approximately 0.43 ha in size. In terms of potential residential yield, the Core Strategy of the Draft Plan has identified possible densities of 15 units/ha for residential lands and 10 units/ha for low density/infill sites. If the proposed site was zoned for residential purposes, it would equate to the provision of 6 no. residential units. If a low-density residential zoning were applied, it would equate to the provision of 4 no. residential units.

By designating residential zoning on these lands, it would necessitate an allocation of housing units from the Core Strategy and as a result would reduce the allocations available to other towns, villages and rural areas in the county. It is considered that the approach taken in the Core Strategy outlines the most sustainable and balanced approach to the future development of both the urban and rural areas of the county, and in respect of Kinlough, the approach is consistent with the established pattern and character of the area.

As part of this evidence-based approach to the identification of lands for residential development an Infrastructural Assessment and Land Use Evaluation was carried out. This assessment is based on a

range of criteria including infrastructure availability/constraints, the proximity of the lands to existing services and facilities, and any environmental constraints that may impede or restrict the development of the lands.

Infrastructural assessment and land use evaluation

Roads	Footpath	Water Supply	Waste Water	Compact Growth	Co-ordinated Development
1	0	2	0	x	x

Having regard to the distance of the lands from the centre of the Plan area, a ‘Residential’ land use zoning objective would not be consistent with the required application of the sequential approach. The sequential approach provides that the zoning of lands shall extend outwards from the centre of an urban area with undeveloped lands closest to the core and on public transport routes being given preference, encouraging infill opportunities, and that areas to be zoned shall be contiguous to existing zoned development lands. The lands are not currently needed to satisfy residential land requirements. There is no justification therefore to zone the proposed lands for residential use within the Draft Plan.

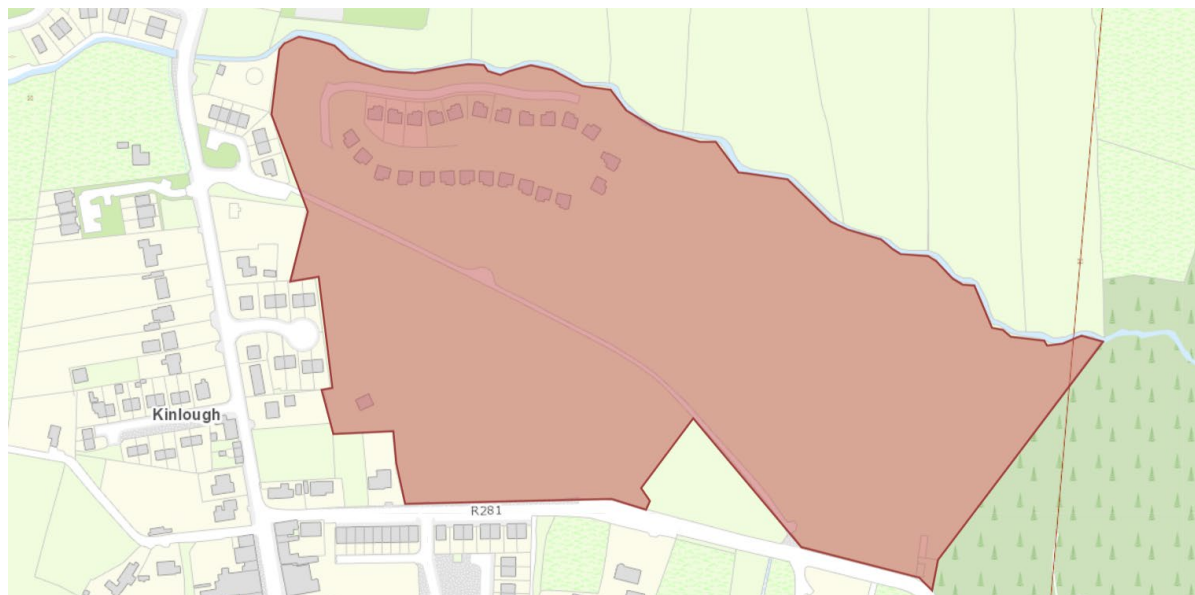
It is noted that there is a current planning application lodged seeking to develop short stay accommodation units on the subject lands which is the subject of a request for Further Information.

Chief Executive’s Recommendation

No change to the Draft Plan.

Submission no.	DLCDP-80
Submitted by:	Charlie Fergus
Theme (s):	Zoning - Kinlough

Map showing lands subject to Submission:



Summary of Submission:

The submission relates to lands in the townland of Kinlough within the settlement boundary of Kinlough. The site was as zoned as *Primary Residential (Undeveloped)* in the Leitrim County Development Plan 2015-2021 and is zoned as *Existing Residential* and *Agriculture* in the Draft Plan. It is requested to zone the lands for residential use. The submission outlines that significant works have been carried out in the past on a further 59 dwellings in addition to the area identified as ‘Existing Residential’ in the Draft Plan. However, these dwellings have not been constructed.

Chief Executive’s Response:

The plot of land identified measures approximately 12.68 ha in size. Lough Melvin Forest Park was a proposed mixed use development permitted in 2006 and benefitting from the Upper Shannon Rural Renewal Scheme. The permitted composite scheme which involved 3 separate planning applications, all of which were appealed to An Bord Pleanála, consisted of 95 no. detached houses, a 120-bedroom hotel / leisure centre and office development. 25 no. houses are substantially completed along with works to all of the other houses (primarily foundation slabs / damp proof coursing) in place. The sites of the permitted hotel and office development were excavated and / or cleared but no further works took place within the life of their respective planning permissions. The site is therefore considered a brownfield site in its entirety. The 25 no. houses do not require a new grant of planning permission to be completed for occupation subject to the original access road to the Rossinver Road being completed. The remainder of the development would require planning permission to be completed but not retained.

In the Draft Plan, the area of the majority (24 no.) of the substantially completed houses were identified as ‘*Existing Residential*’ with the balance of the lands identified as ‘*Agricultural*’. The entirety of the lands were identified as ‘*Primarily Residential (Undeveloped)*’ in the 2015-2021 County Development Plan.



The brownfield nature of the entire lands is clearly visible from the aerial photograph which the land use zoning objectives map does not depict

As part of this evidence-based approach to the identification of lands for residential development an Infrastructural Assessment and Land Use Evaluation was carried out. This assessment is based on a range of criteria including infrastructure availability/constraints, the proximity of the lands to existing services and facilities, and any environmental constraints that may impede or restrict the development of the lands.

Infrastructural assessment and land use evaluation

Roads	Footpath	Water Supply	Waste Water	Compact Growth	Co-ordinated Development
1	1	1	1	✓	✓

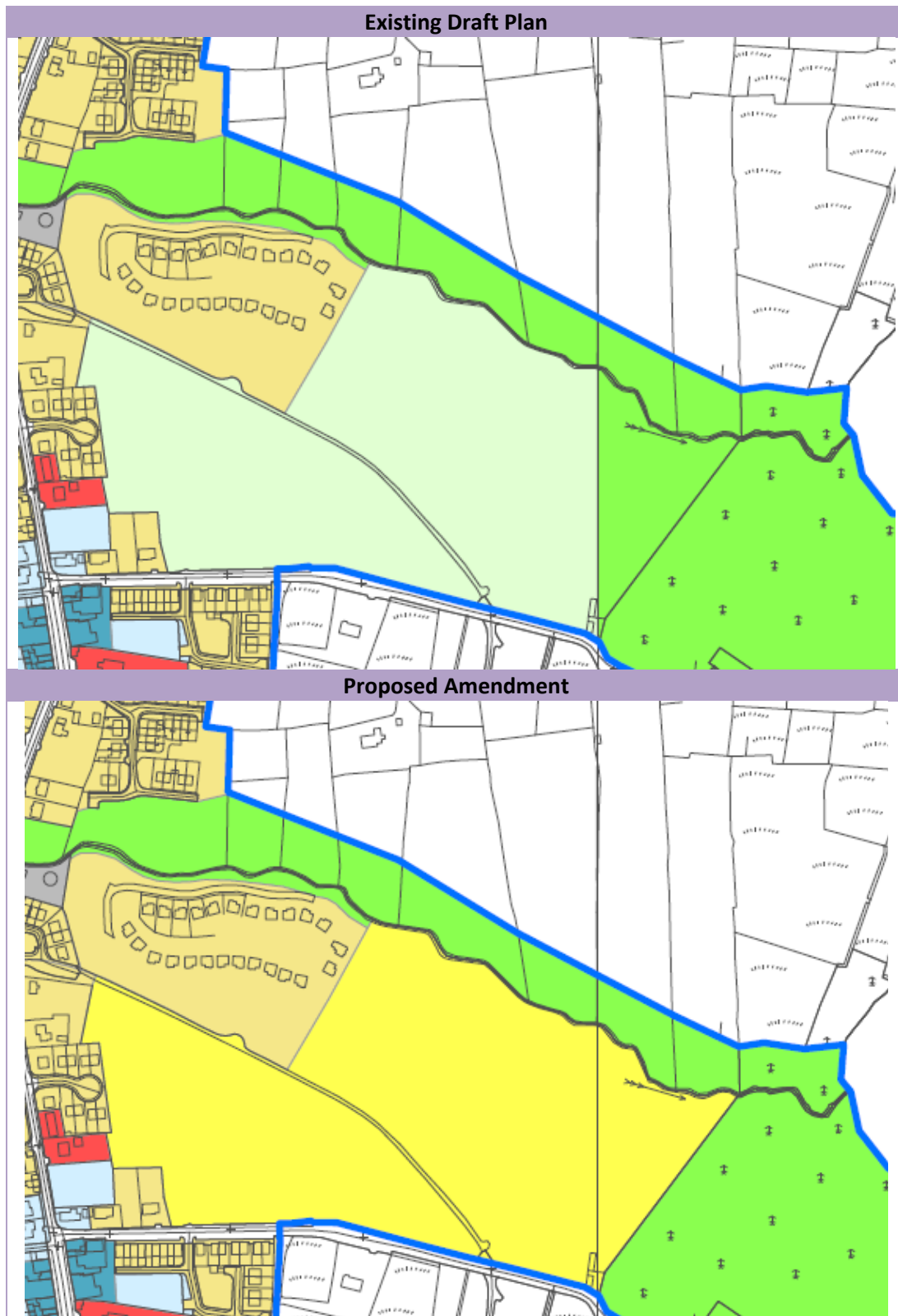
On reflection and in the interest of consistency (ref. to The Fairways development in Dromod), it is considered that the site in its entirety represents a brownfield site. The development is a legacy issue which needs to be addressed noting the stated desire of the landowner to complete the development. The removal of a land use zoning objective to facilitate such a resolution would not be considered in the interests of the proper planning and sustainable development of the area noting the extent of resources and the associated carbon footprint which have been used in bringing the development to its current condition. Furthermore, the site has a very favourable outcome through the infrastructural assessment and land use evaluation. It is considered that the landowner should be afforded the opportunity to complete the development although noting that this may well extend beyond the life of the current County Development Plan. It is considered that a phased approach to the resolution and development of the remainder of the subject lands has considerable merit. In this regard, the principle of the development of 25 no. additional residential units on the subject lands represents a sustainable level of phased development and this yield should be reflected in the updated Core Strategy Table (Table 2.6) over the life of the Plan. Consequently, the subject lands are recommended to be amended from ‘Agricultural’ to ‘New Residential’ to reflect this and qualified by a specific objective.



The increase in yield from lands identified for residential development is not considered to such an extent that would require a reduction / realignment of the allocations available to other towns, villages and rural areas in the county to be reconsidered. It also has regard to the positioning of Kinlough in the settlement hierarchy. It is considered that such scope is provided for under the 'Development Plan Guidelines for Planning Authorities' (June 2022) in Section 4.4.3 'Ensuring Sufficient Provision of Housing Lands/Sites' for such an approach. The yield of this and all other such sites have been included in the revised Table 2.6 of the Core Strategy recommended in the Chief Executive's Report (Recommendation No. 117 refers).

Chief Executive's Recommendation

Chief Executive's Recommendation No. 135: Amend the zoning of lands contained within the Lough Melvin Forest Park unfinished housing development and adjoining brownfield lands from *Agricultural* to *New Residential* inclusive of a small area contained therein to the east which was zoned *Open Space and Amenity* in the Draft Plan.



Recommendation No. 137: Insert the following objective into the Drumshanbo Settlement Plan in Section 6 of Volume II of the Draft Plan and renumber subsequent objectives accordingly:

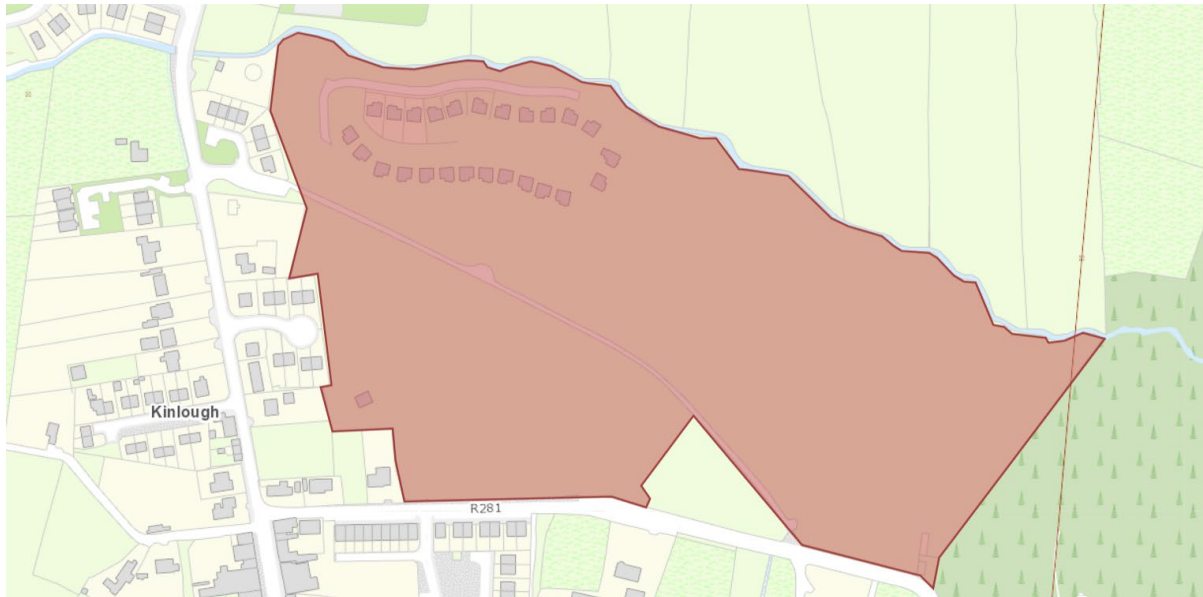
KLN 14: Facilitate a phased work out of the Lough Melvin Forest Park unfinished housing development over the life of this Development Plan. This Development Plan supports the principle of the completion and occupation of a total of 50 no. houses to include



the 24 no. houses effectively completed adjoining Clanchy Court housing development. Subject to the completion and occupation of these 50 no. houses to the satisfaction of the Planning Authority, further consideration to an additional phase may be permitted by the Planning Authority subject to the implementation of the Housing Strategy and confirmation that the Local Authority remain within the overall housing units provided for within the Core Strategy. The principle of completion of the hotel / leisure centre is acceptable in principle and the office development is open to consideration. Any further uses within the overall lands zoned for '*New Residential*' will be considered on their individual merits within this context and guided by the Zoning Matrix.

Submission no.	DLCDP-61
Submitted by:	Cllr. Des Guckian
Theme (s):	Zoning - Kinlough

Map showing lands subject to Submission:



Summary of Submission:

The submission relates to lands in the townland of Kinlough within the settlement boundary of Kinlough. The site was as zoned as *Primary Residential (Undeveloped)* in the Leitrim County Development Plan 2015-2021 and is zoned as *Existing Residential* and *Agriculture* in the Draft Plan. It is proposed to zone the lands for residential use.

Chief Executive’s Response:

Refer to the Chief Executive’s Response to Submission Ref. No. DLCDP-61.

Chief Executive’s Recommendation

As per the Chief Executive’s Recommendation on Submission Ref. No. DLCDP-61.

Submission no.	DLCDP-170
Submitted by:	Simon Foley
Theme (s):	Zoning - Kinlough

Map showing lands subject to Submission:



Summary of Submission:

The submission relates to lands in the townland of Kinlough within the settlement boundary of Kinlough. The site was as zoned as *Residential Reserve/Support* in the Leitrim County Development Plan 2015-2021 and is outside the settlement boundary for Kinlough in the Draft Plan. It is requested to zone the lands for mixed use.

Chief Executive’s Response:

A key principle of the NPF and RSES is to promote consolidation of existing settlements and more compact forms of growth. As such, it is an objective of the Draft Plan, in line with national and regional policy, to facilitate infill and brownfield development within the existing built footprint of urban settlements. In an effort to achieve compact growth and consolidate the town of Kinlough, the settlement boundary was contracted which resulted in some lands being dezoned. It would not be considered appropriate to zone lands for Mixed Use on the periphery of the settlement and there is no comparable precedent in any other land use zoning map within Co. Leitrim. Mixed use represents a transition from commercial use associated with a town or village centre in which there is a mix of residential and commercial uses before the predominant land use becomes residential. There is no justification therefore to zone the proposed lands for residential use within the Draft Plan.

It is noted that there is a current planning application seeking to retain an unauthorised use of the subject site as a private commercial transport service parking area (buses) and maintenance shed. This application is the subject of a request for further information. The principle of the proposed use is being considered on its merits.

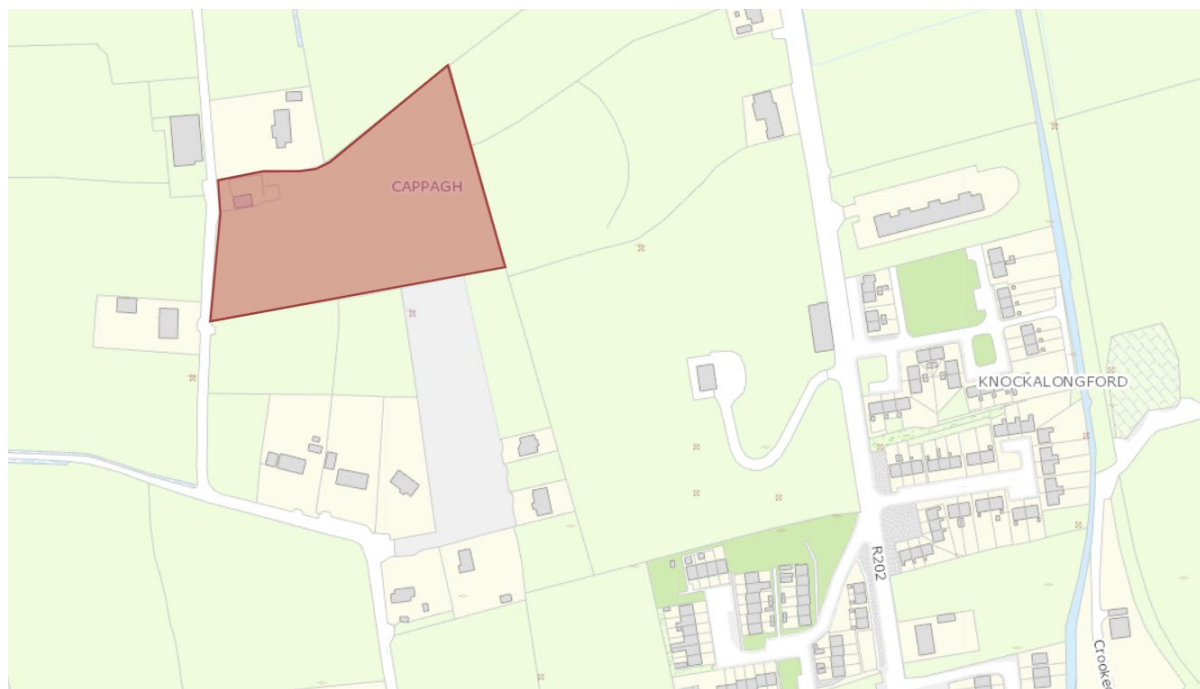
Chief Executive’s Recommendation

No change to the Draft Plan.

7.7 Mohill

Submission no.	DLCDP-36
Submitted by:	David Gordon
Theme (s):	Zoning - Mohill

Map showing lands subject to Submission:



Summary of Submission:

The submission relates to lands in the townland of Cappagh outside the settlement boundary of Mohill. The site was not zoned in the Leitrim County Development Plan 2015-2021 and is outside the settlement boundary for Mohill as identified in the Draft Plan. It is requested to extend the development boundary and zone the lands for residential use.

Chief Executive’s Response:

The plot of land identified measures approximately 1.7 ha in size. In terms of potential residential yield, the Core Strategy of the Draft Plan has identified possible densities of 15 units/ha for residential lands and 10 units/ha for low density/infill sites. If the proposed site was zoned for residential purposes, it would equate to the provision of 26 no. residential units. If a low-density residential zoning were applied, it would equate to the provision of 17 no. residential units.

By designating residential zoning on these lands, it would necessitate an allocation of housing units from the Core Strategy and as a result would reduce the allocations available to other towns, villages and rural areas in the county. It is considered that the approach taken in the Core Strategy outlines the most sustainable and balanced approach to the future development of both the urban and rural areas of the county, and in respect of Mohill, the approach is consistent with the established pattern and character of the area.

As part of this evidence-based approach to the identification of lands for residential development an Infrastructural Assessment and Land Use Evaluation was carried out. This assessment is based on a range of criteria including infrastructure availability/constraints, the proximity of the lands to existing

services and facilities, and any environmental constraints that may impede or restrict the development of the lands.

Infrastructural assessment and land use evaluation

Roads	Footpath	Water Supply	Waste Water	Compact Growth	Co-ordinated Development
1	0	1	1	x	x

Having regard to the distance of the lands from the centre of the Plan area, a ‘Residential’ zoning would not be consistent with the required application of the sequential approach. The sequential approach provides that the zoning of lands shall extend outwards from the centre of an urban area with undeveloped lands closest to the core and on public transport routes being given preference, encouraging infill opportunities, and that areas to be zoned shall be contiguous to existing zoned development lands. The lands are not currently needed to satisfy residential land requirements. Furthermore, the site fails the Infrastructural Assessment and Land Use Evaluation as outlined above and there is no justification therefore to zone the proposed lands for residential use within the Draft Plan.

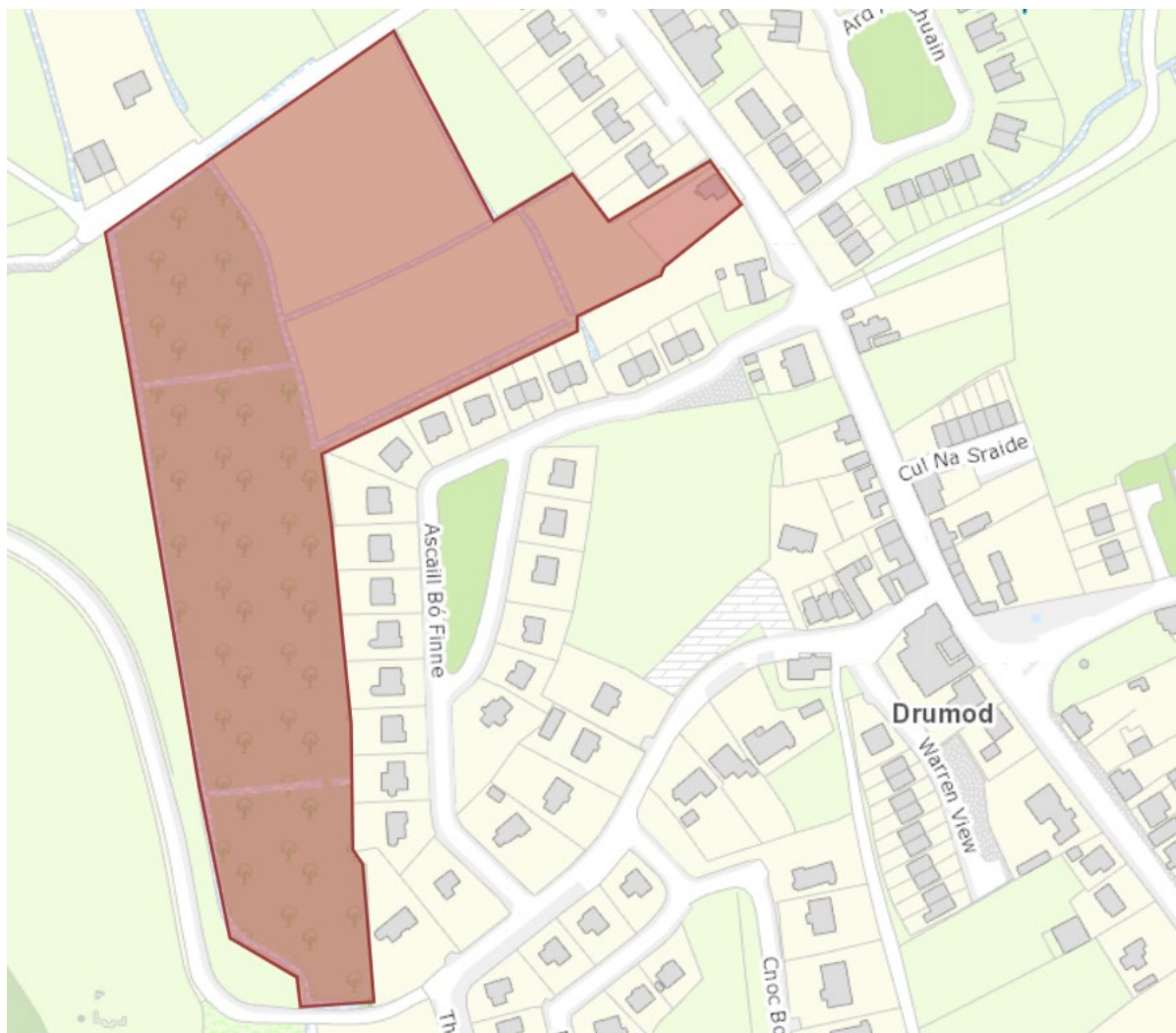
Chief Executive’s Recommendation

No change to the Draft Plan.

7.8 Dromod

Submission no.	DLCDP-19
Submitted by:	Odhran Duignan
Theme (s):	Zoning - Dromod

Map showing lands subject to Submission:



Summary of Submission:

The submission relates to lands in the townlands of Drumod Beg and Aughry within the settlement boundary of Dromod. The site was zoned as *Open Space & Amenity* in the Leitrim County Development Plan 2015-2021 and was zoned for a combination of *Agriculture* and *Open Space/Amenity* in the Draft Plan. It is requested that the lands are zoned as a flood plain as compared to the current zonings and the constrained land use zoning.

Chief Executive’s Response:

The Draft Plan provides the following land use zoning objective for areas zoned *Constrained Land Use*:

“To ensure the appropriate management and sustainable use of flood risk areas designated as ‘Constrained Land Use’ on Settlement Plans”. In this regard, it should be acknowledged that the Constrained Land Use designation also coincides with additional



zoning designations of *Agriculture and Open Space & Amenity*, reflecting appropriate, less vulnerable uses in such lands.

It is also outlined in Section 6.10.4 of Volume I of the Draft Plan that development proposals

“within the areas designated as ‘Constrained Land Use’ shall be accompanied by a detailed Flood Risk Assessment, carried out in accordance with ‘The Planning System and Flood Risk Assessment Guidelines’ and ‘Circular PL 2/2014’ (or as updated), which shall assess the risks of flooding associated with the proposed development. Proposals shall only be considered favourably by the Planning Authority where it is demonstrated that they would not have adverse impacts or impede access to a watercourse, floodplain or flood protection and management facilities, or increase the risk of flooding to other locations”.

The SFRA has been undertaken in compliance with the 2009 Ministerial Guidelines on Flood Risk Assessment and appropriate provisions have been included in the Draft Plan to contribute towards flood risk management. Submissions have been received by the Office of the Planning Regulator (OPR) and the Office of Public Works (OPW). The OPR submission states the Office supports the objectives and policies included in the draft Plan in respect of flooding, which are considered appropriate. The OPW submission states that they welcome the inclusion of flood risk management policies FRM POL 1 – FRM POL 16 and objectives FRM OBJ 1 – FRM ONJ 2. Both submissions have resulted in updates being made to the Plan/SFRA as are detailed elsewhere in this Chief Executive's Report. Accordingly, it is recommended that there be no change to the Draft Plan in relation to these subject lands.

Infrastructural assessment and land use evaluation

It is not considered that such an evaluation is required having regard to the nature of the proposed change.

Chief Executive's Recommendation

No change to the Draft Plan.

Submission no.	DLCDP-35
Submitted by:	Eugene Cox
Theme (s):	Zoning - Dromod

Map showing lands subject to Submission:



Summary of Submission:

The submission relates to lands in the townlands of Drumod Beg within the settlement boundary of Dromod. The site was zoned as *Residential Reserve/Support* in the Leitrim County Development Plan 2015-2021 and was zoned *Open Space/Amenity* in the Draft Plan. It is requested that the lands are zoned for residential purposes.

Chief Executive’s Response:

A Strategic Flood Risk Assessment was prepared as part of the preparation of the Draft County Development Plan. The OPW CFRAMS Flood Maps indicate that the subject lands, other than the existing house and adjoining infill site onto Main Street are located in Flood Zones A and B. Residential Development is classed as a ‘Highly Vulnerable development’ in ‘The Planning System and Flood Risk Management Guidelines’ and would not be considered a suitable land use on undeveloped lands located in Flood Zone A or B, particularly when there are lands with a lower risk of flooding available for development elsewhere in the village. It is also important to note that the level of additional residential development earmarked for the village is modest.

Most of the subject lands are zoned *Open Space & Amenity* as well as being identified as an area of *Constrained Land Use* in the Draft Plan. Owing to the *Constrained Land Use* nature of these lands, only compatible, less vulnerable land uses can be accommodated on these lands, therefore it is recommended that there is no change to the Draft Plan on foot of this submission.

The Elected Members considered this site following receipt of the Chief Executive’s Draft County Development Plan and accepted the response of the Executive on the basis of the foregoing.



Infrastructural assessment and land use evaluation

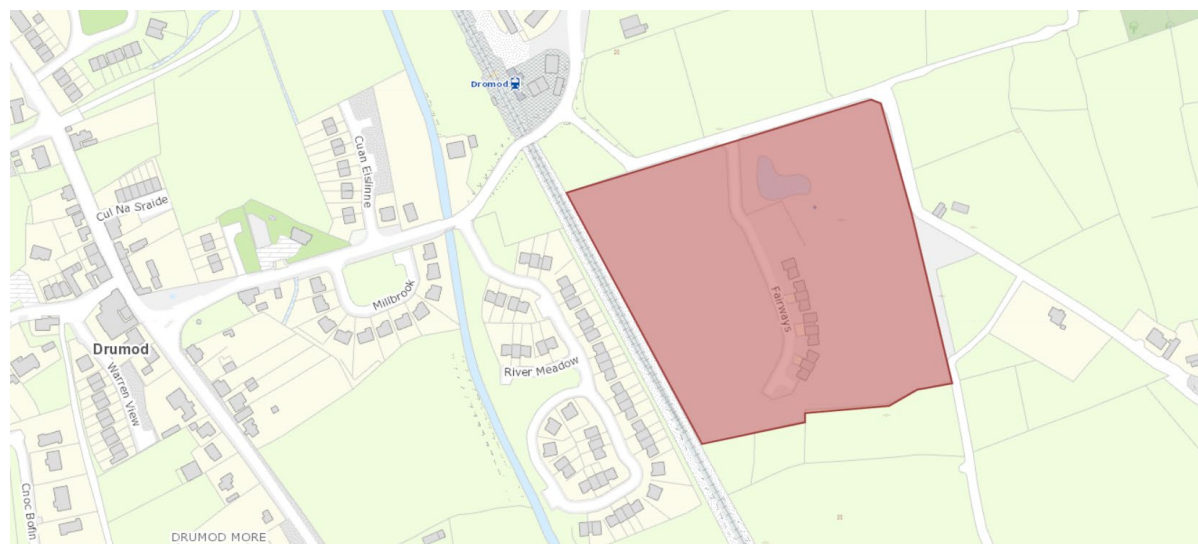
Roads	Footpath	Water Supply	Waste Water	Compact Growth	Co-ordinated Development
1	1	1	1	✓	✗

Chief Executive's Recommendation

No change to the Draft Plan.

Submission no.	DLCDP-51
Submitted by:	Fergal McLoughlin
Theme (s):	Zoning - Dromod

Map showing lands subject to Submission:



Summary of Submission:

The submission relates to lands in the townlands of Clooncolry on the eastern fringe of the settlement of Dromod. The site was zoned as *Tourism Related Development* in the Leitrim County Development Plan 2015-2021 and was not zoned in the Draft Plan and was outside the settlement boundary for Dromod. It is requested that the settlement boundary is extended and that the lands are zoned for residential purposes.

Chief Executive’s Response:

The submission relates to lands surrounding the existing residential development known as “*The Fairways*”. This development formed part of a larger permitted development comprising a golf course, clubhouse, hotel and housing scheme that was partially constructed prior to the effective period of the permission expiring. It is acknowledged that there is a residential use in place at the moment and that the existing housing development consisting of 11 no. houses has been taken in charge by the Council.

The plot of land identified measures approximately 1.7 ha in size. In terms of potential residential yield, the Core Strategy of the Draft Plan has identified possible densities of 15 units/ha for residential lands and 10 units/ha for low density/infill sites. If the proposed site was zoned for residential purposes, it would equate to the provision of 26 no. residential units. If a low-density residential zoning were applied, it would equate to the provision of 17 no. residential units. This would be considered less important than with respect to other submissions in that there are existing concrete ground floor slabs, foundations and rising blockwork in place. It is the intention of the landowners / developers to complete this development with regard had to the fact that the site is fully serviced. The new owners of the subject site have engaged with the Planning Authority since the preparation of the Chief Executive’s Draft Development Plan was submitted to the Elected Members last November for their consideration.

Dromod has been identified as a Tier 3 Key Village in the county which highlights its role in supporting the social, economic and cultural life within rural communities. The village also holds a strategic

location given that it is located on the Sligo – Dublin rail line with a fully operational train station in close proximity to the centre of the village. On account of its location and its strategic transport links (rail line, N4 national route, Shannon blueway), it could be argued that the provision of additional residential lands is justified in and in line with the existing characteristics of development in the village.

The proposed lands are located approximately 250m from the Dromod train station and it can be argued that the lands are brownfield in nature as a result of the development that previously took place. The existing development works were covered over as part of a site resolution plan agreed with the receiver but accepted that these could be relied upon at a future date with the agreement of the Planning Authority. By implementing a residential zoning on the lands, it could also have the positive effect on providing a usable open space amenity for the exiting dwellings as well as finishing off of the development on serviced lands.

As part of this evidence-based approach to the identification of lands for residential development an Infrastructural Assessment and Land Use Evaluation was carried out. This assessment is based on a range of criteria including infrastructure availability/constraints, the proximity of the lands to existing services and facilities, and any environmental constraints that may impede or restrict the development of the lands.

Infrastructural assessment and land use evaluation

Roads	Footpath	Water Supply	Waste Water	Compact Growth	Co-ordinated Development
1	1	1	1	✓	✓

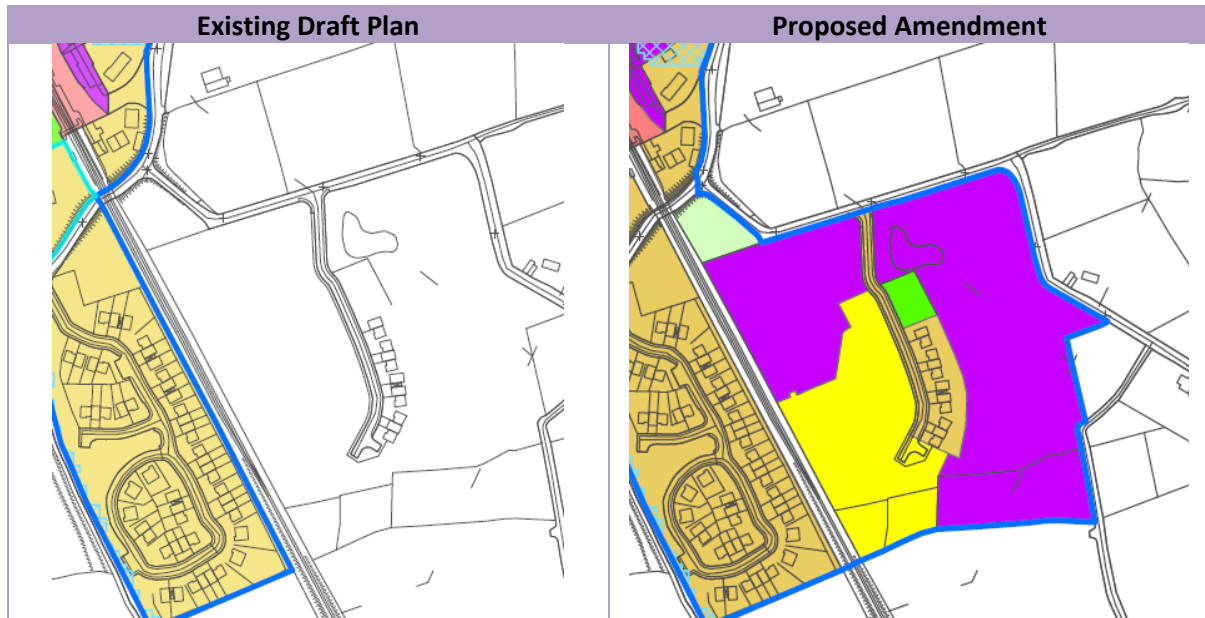
The proposal to zone these lands would facilitate the extension and completion of the existing residential development, The Fairways, which could be considered as co-ordinated development. Given the distance of the lands from the centre of the Plan area, the application of the sequential approach must be undertaken. The sequential approach provides that the zoning of lands shall extend outwards from the centre of an urban area with undeveloped lands closest to the core and on public transport routes being given preference, encouraging infill opportunities, and that areas to be zoned shall be contiguous to existing zoned development lands. As a result, it is considered appropriate to zone these lands for residential purposes. The extent of lands have been amended to reflect the extent of the previous brownfield site with the exception of the lands in which the hotel / club house were previously permitted being identified for *Tourism* land use zoning objective. The lands to the rear of the existing housing development are identified for *‘Agricultural’* use which is considered appropriate.

By designating additional residential zoning on these lands in Dromod, it would facilitate a slight increase in the yield of housing units from the Core Strategy (Table 2.6 refers) contained in the Draft Plan. This increase in yield is not to such an extent that would require a reduction / realignment of the allocations available to other towns, villages and rural areas in the county to be reconsidered. It is considered that such scope is provided for under the *‘Development Plan Guidelines for Planning Authorities’* (June 2022) in Section 4.4.3 *‘Ensuring Sufficient Provision of Housing Lands/Sites’*. The yield of all such sites have been included in the revised Table 2.6 of the Core Strategy recommended in the Chief Executive’s Report (Recommendation No. 117 refers).

Chief Executive’s Recommendation.

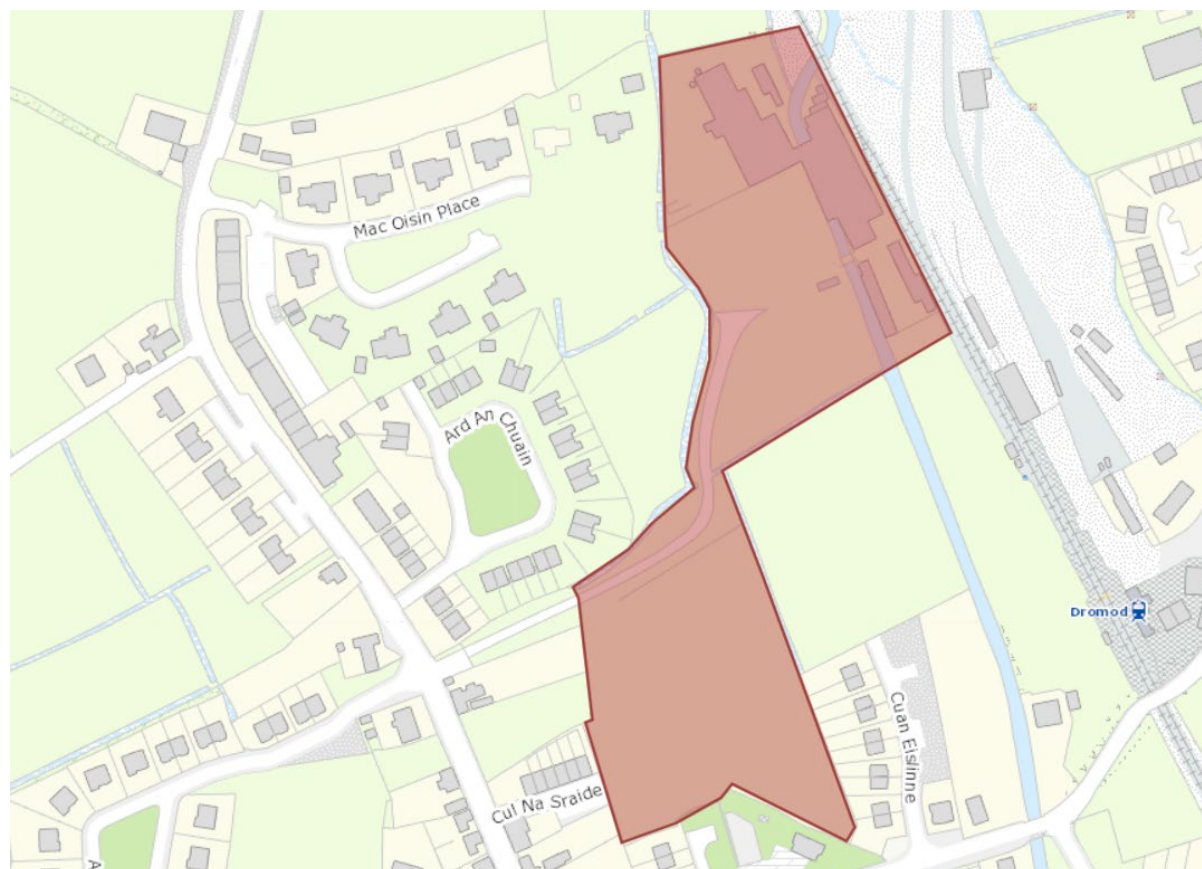
Recommendation No. 137: Extend the settlement boundary to include the Fairways development and zone the lands as follows:

- The existing dwellings within the Fairways housing development to be zoned as *Existing Residential* with the lands immediately to the west of same zoned as *Open Space*.
- Lands to the west of the existing development to be zoned as *Residential* coinciding largely with the brownfield development lands associated with the former residential element of the composite development.
- The lands of the former permitted hotel / golf club house and lands to the east / north of the Fairways housing development to be zoned for *Tourism* use.



Submission no.	DLCDP-62
Submitted by:	Yack Unlimited Company
Theme (s):	Zoning - Dromod

Map showing lands subject to Submission:



Summary of Submission:

The submission relates to lands in the townlands of Drumod Beg within the settlement boundary of Dromod. The site was zoned as *Mixed Use* and *Enterprise and Employment* in the Leitrim County Development Plan 2015-2021 and was zoned a combination of *New Residential, Enterprise and Employment* and *Open Space/Amenity* land use zoning objective in the Draft Plan. It is requested that the lands zoned *Open Space/Amenity* be rezoned for residential purposes.

Chief Executive’s Response:

The lands that have been zoned for *Open Space/Amenity* purposes have also been identified as an area of *Constrained Land Use* in the Draft Plan. Owing to the *Constrained Land Use* nature of these lands, only compatible, less vulnerable land uses can be accommodated on these lands and for that reason the *Open Space/Amenity* zoning has been implemented here. Given the constraints on this portion of lands, it is considered that there is no change to this zoning. It would be considered appropriate however at planning application stage for the area of open space to be compensated within this zoned extent should it result in a more regular shape resulting. This would adhere to the recommendations of the Flood Guidelines. Equally, the area of Open Space can be considered in the context of providing for the needs of the residents within the proposed residential development. Once the volume of flood waters associated with the existing topography of the site are retained in a development proposal through compensation within the extent of zoned lands, this should meet the



approval of the Planning Authority at planning application stage. It would be inappropriate to consider such measures at plan making stage.

In terms of the lands zoned for *Enterprise and Employment*, it is also noted that these lands have been identified as an area of *Constrained Land Use* in the Draft Plan. The zoning for this site was subject to the Justification Test, the findings of which are detailed on Table 8 of the SFRA that accompanies the Draft Plan. There are existing Enterprise and Employment uses on these lands and they have been assessed as passing the Justification Test.

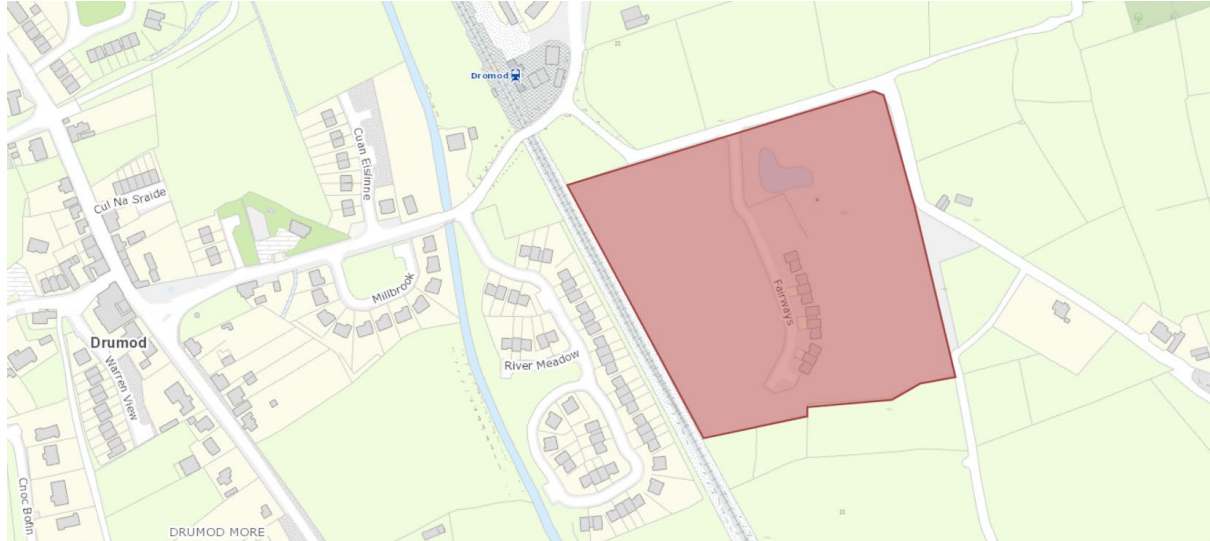
Having regard to the nature of the submission which relates solely to flood risk, it was not considered necessary to undertake an infrastructural assessment and land use evaluation.

Chief Executive's Recommendation

No change to the Draft Plan.

Submission no.	DLCDP-63
Submitted by:	Fionbar Cox
Theme (s):	Zoning - Dromod

Map showing lands subject to Submission:



Summary of Submission:

The submission relates to lands in the townlands of Clooncolry on the eastern fringe of the settlement of Dromod. The site was zoned as *Tourism Related Development* in the Leitrim County Development Plan 2015-2021 and was not zoned in the Draft Plan and was outside the settlement boundary for Dromod. It is requested that the settlement boundary be extended and that the lands are zoned for residential purposes.

Chief Executive’s Response:

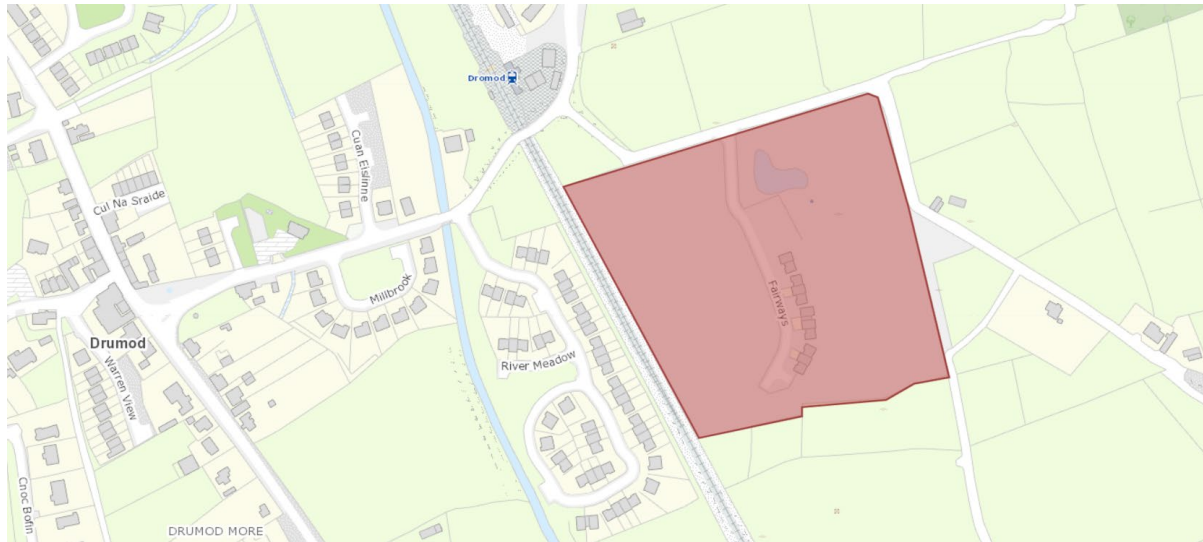
Refer to the Chief Executive’s Response to Submission Ref. No. DLCDP-51.

Chief Executive’s Recommendation

As per the Chief Executive’s Recommendation on Submission Ref. No. DLCDP-51.

Submission no.	DLCDP-64
Submitted by:	Ross McLoughlin
Theme (s):	Zoning - Dromod

Map showing lands subject to Submission:



Summary of Submission:

The submission relates to lands in the townlands of Clooncolry on the eastern fringe of the settlement of Dromod. The site was zoned as *Tourism Related Development* in the Leitrim County Development Plan 2015-2021 and was not zoned in the Draft Plan and was outside the settlement boundary for Dromod. It is requested that the settlement boundary be extended and that the lands are zoned for residential purposes.

Chief Executive’s Response:

Refer to the Chief Executive’s Response to Submission Ref. No. DLCDP-51.

Chief Executive’s Recommendation

As per the Chief Executive’s Recommendation on Submission 51 Ref. No. DLCDP-51.

7.9 Drumsna

Submission no.	DLCDP-4
Submitted by:	Karl McLoughlin
Theme (s):	Zoning - Drumsna

Map showing lands subject to Submission:

No map submitted

Summary of Submission:

While no specific lands have been identified the submission, it requests that serviced lands that were previously zoned should not be dezoned in the new Plan.

Chief Executive's Response:

The NPF and the RSES place emphasis on the need for compact, smart and sustainable growth and requires 30% of all new housing to be within existing urban footprints, thus reducing the amount of greenfield land required to meet future housing requirements. It is therefore appropriate that sustainable planning criteria are used to inform the assessment of each site. The sequential approach provides that the zoning of lands shall extend outwards from the centre of an urban area with undeveloped lands closest to the core and on public transport routes being given preference, encouraging infill opportunities, and that areas to be zoned shall be contiguous to existing zoned development lands.

Each of the settlements included in Volume II of the Draft County Development Plan is defined by a development boundary wherein, development is generally encouraged in an orderly sequential manner, extending outwards from the core. The identified settlement boundaries will manage the expansion of the settlements whilst allowing settlement cores to be developed in a manner consistent with existing character of each individual location. The pattern of development aims to consolidate the built environment of the settlements, maximise the efficient use of existing and future infrastructure and promote sustainability, active travel and make more efficient use of underutilised lands.

It is considered that the approach taken in the Core Strategy to consolidate our existing villages outlines the most sustainable and balanced approach to the future development of the county. The village was not subject to land use zoning objectives in the existing County Development Plan similar to Tullaghan. In the application of land use zoning objectives, there has to be an alignment between the extent of lands identified for residential development and the household allocation provided for in the Core Strategy (Table 2.6 refers). It was agreed at the consideration of the Draft Plan by the Elected Members that careful consideration is required with regard to the future expansion of Drumsna such is the importance of the built fabric and character of the village. A similar consideration is required with respect to Jamestown. On that basis, it was agreed that the extent of land identified for future residential use should be modest and the most appropriate site adjoining existing housing developments was identified.

There is no justification therefore to identify additional lands in Drumsna for residential development.

Chief Executive's Recommendation

No change to the Draft Plan.

Submission no.	DLCDP-47
Submitted by:	Terry McManus
Theme (s):	Zoning - Drumsna

Map showing lands subject to Submission:



Summary of Submission:

The submission relates to lands in the townland of Drumsna outside the settlement boundary of Drumsna. The site was zoned as zoned *General Development* in the Leitrim County Development Plan 2015-2021 and is outside the settlement boundary for Drumsna in the Draft Plan. It is requested to zone the lands for residential use.

Chief Executive’s Response:

The plot of land identified measures approximately 0.5 ha in size. In terms of potential residential yield, the Core Strategy of the Draft Plan has identified possible densities of 15 units/ha for residential lands and 10 units/ha for low density/infill sites. If the proposed site was zoned for residential purposes, it would equate to the provision of 8 no. residential units. If a low-density residential zoning were applied, it would equate to the provision of 5 no. residential units.

Part of the subject lands are already included within the settlement boundary of the village as contained in Volume II of the Draft Plan. The remainder comprises of backlands with a narrow infill access point, in between residential units off the R299 regional road.

By designating residential zoning on these lands, it would necessitate an allocation of housing units from the Core Strategy and as a result would reduce the allocations available to other towns, villages and rural areas in the county. It is considered that the approach taken in the Core Strategy outlines the most sustainable and balanced approach to the future development of both the urban and rural areas of the county, and in respect of Drumsna, the approach is consistent with the established

pattern and character of the area. It is also important to note that the level of additional residential development earmarked for the village is modest.

As part of this evidence-based approach to the identification of lands for residential development an Infrastructural Assessment and Land Use Evaluation was carried out. This assessment is based on a range of criteria including infrastructure availability/constraints, the proximity of the lands to existing services and facilities, and any environmental constraints that may impede or restrict the development of the lands.

Infrastructural assessment and land use evaluation

Roads	Footpath	Water Supply	Waste Water	Compact Growth	Co-ordinated Development
1	1	1	1	✘	✘

It is considered that the approach taken in the Core Strategy to consolidate our existing villages outlines the most sustainable and balanced approach to the future development of the county.

The village was not subject to land use zoning objectives in the existing County Development Plan similar to Tullaghan. In the application of land use zoning objectives, there has to be an alignment between the extent of lands identified for residential development and the household allocation provided for in the Core Strategy (Table 2.6 refers). It was agreed at the consideration of the Draft Plan by the Elected Members that careful consideration is required with regard to the future expansion of Drumsna such is the importance of the built fabric and character of the village. A similar consideration is required with respect to Jamestown. On that basis, it was agreed that the extent of land identified for future residential use should be modest and the most appropriate site adjoining existing housing developments was identified. As the site fails the Infrastructural Assessment and Land Use Evaluation as outlined above, there is no justification therefore to zone the proposed lands for residential use within the Draft Plan.

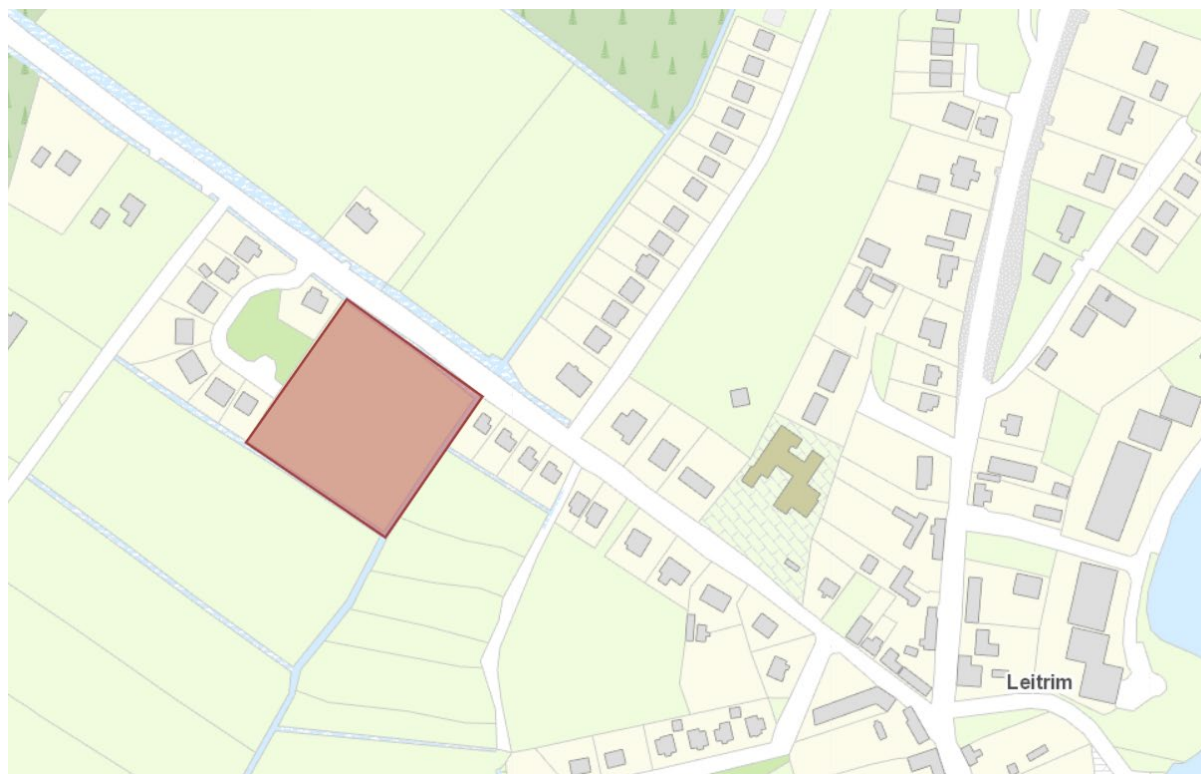
Chief Executive’s Recommendation

No change to the Draft Plan.

7.10 Leitrim Village

Submission no.	DLCDP-14
Submitted by:	Joe Casey
Theme (s):	Zoning – Leitrim Village

Map showing lands subject to Submission:



Summary of Submission:

The submission relates to lands in the townland of Drumhierny outside the settlement boundary of Leitrim village. The site was not zoned in the Leitrim County Development Plan 2015-2021 and is outside the settlement boundary for Leitrim village in the Draft Plan. It is requested to zone the lands for residential/mixed use.

Chief Executive’s Response:

The OPW CFRAMS Flood Maps indicate that a significant portion of the subject lands are located in Flood Zones A and B. A Strategic Flood Risk Assessment was prepared as part of the preparation of the Draft County Development Plan. Residential Development is classed as a Highly Vulnerable development in ‘The Planning System and Flood Risk Management Guidelines’ and would not be considered a suitable land use on undeveloped lands located in Flood Zone A or B, particularly when there are lands with a lower risk of flooding available for development elsewhere in the village. It is also important to note that the level of additional residential development earmarked for the village is modest.

Infrastructural assessment and land use evaluation

Roads	Footpath	Water Supply	Waste Water	Compact Growth	Co-ordinated Development
1	1	1	1	x	x

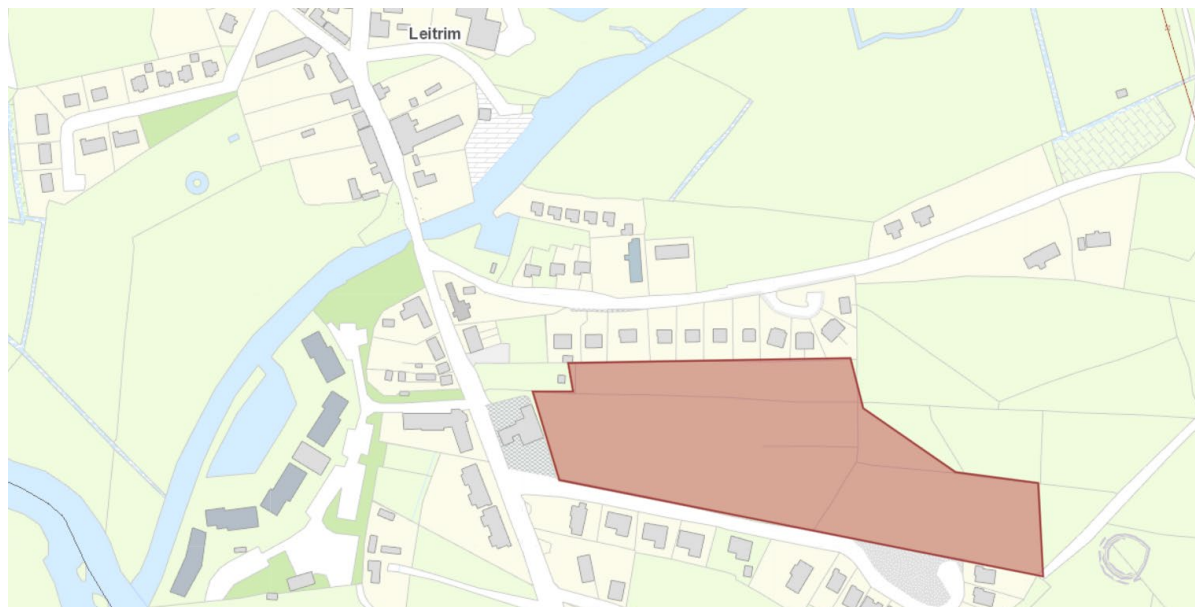
On the basis of the accepted flood risk associated with the subject lands and the history of flooding at this location which has in the past necessitated the provision of a temporary scaffolded bridge to connect the residents of the adjoining Drumhierney Manor development to the village, there is no justification to accede to the proposed land use zoning submission.

Chief Executive’s Recommendation

No change to the Draft Plan.

Submission no.	DLCDP-55
Submitted by:	Charles Donnellan
Theme (s):	Zoning – Leitrim Village

Map showing lands subject to Submission:



Summary of Submission:

The submission relates to lands in the townland of Tullylannan within the settlement boundary of Leitrim village. The site was zoned *Residential Reserve/Support* in the Leitrim County Development Plan 2015-2021 and is partially zoned for *New Residential* and *Open Space* in the Draft Plan. It is requested to zone all the lands for residential use. A comprehensive submission has been put forward outlining the basis for such consideration with weight attached to the proximity of Leitrim Village to the Key Town of Carrick on Shannon and anticipated level of demand for housing within the village.

Chief Executive’s Response:

Of the lands identified in the submission, approximately 1.47 ha is zoned as *New Residential* in the Draft Plan as well as a part of the site being zoned as *Open Space*. The lands adjoining the petrol filling station are subject to flood risk and are the basis for this land use designation. The remainder of the lands extend to approximately 1.6 ha in area. In terms of potential residential yield, the Core Strategy of the Draft Plan has identified possible densities of 15 units/ha for residential lands. If the remainder of the lands was zoned for residential purposes, it would equate to the provision of an additional 24 no. residential units for residential lands which would in keeping with the density of the adjoining housing development (Riversdale).

It is acknowledged however that the zoning applied in the Draft Plan does not follow the natural field boundaries of the lands and it is considered appropriate that the residential zoning be extended to the east to follow the field boundary. This will amount to an additional 0.6 ha and an additional 9 no. residential units.

The lands that have been zoned for *Open Space/Amenity* purposes have also been identified as an area of *Constrained Land Use* in the Draft Plan. Owing to the *Constrained Land Use* nature of these lands, only compatible, less vulnerable land uses can be accommodated on these lands and for that

reason the *Open Space/Amenity* zoning has been implemented here. Given the constraints on this portion of lands it is considered that there is no change to this zoning.

As part of this evidence-based approach to the identification of lands for development an Infrastructural Assessment and Land Use Evaluation was carried out. This assessment is based on a range of criteria including infrastructure availability/constraints, the proximity of the lands to existing services and facilities, and any environmental constraints that may impede or restrict the development of the lands.

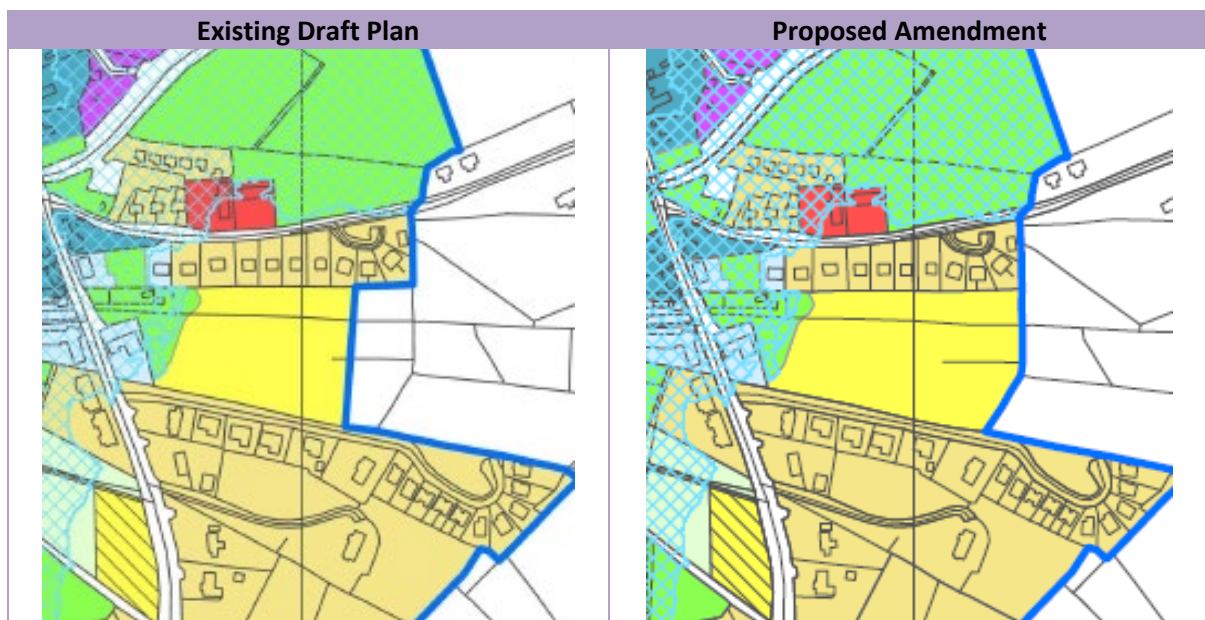
Infrastructural assessment and land use evaluation

Roads	Footpath	Water Supply	Waste Water	Compact Growth	Co-ordinated Development
1	1	1	1	✓	✓

By designating additional residential zoning on these lands, it would facilitate a slight increase in the yield of housing units for Leitrim Village from the Core Strategy (Table 2.6 refers) contained in the Draft Plan. The increase in yield is not considered to such an extent that would require a reduction / realignment of the allocations available to other towns, villages and rural areas in the county to be reconsidered. It is considered that such scope is provided for under the ‘*Development Plan Guidelines for Planning Authorities*’ (June 2022) in Section 4.4.3 ‘*Ensuring Sufficient Provision of Housing Lands/Sites*’. The yield of this and all other such sites have been included in the revised Table 2.6 of the Core Strategy recommended in the Chief Executive’s Report (Recommendation No. 117 refers).

Chief Executive’s Recommendation

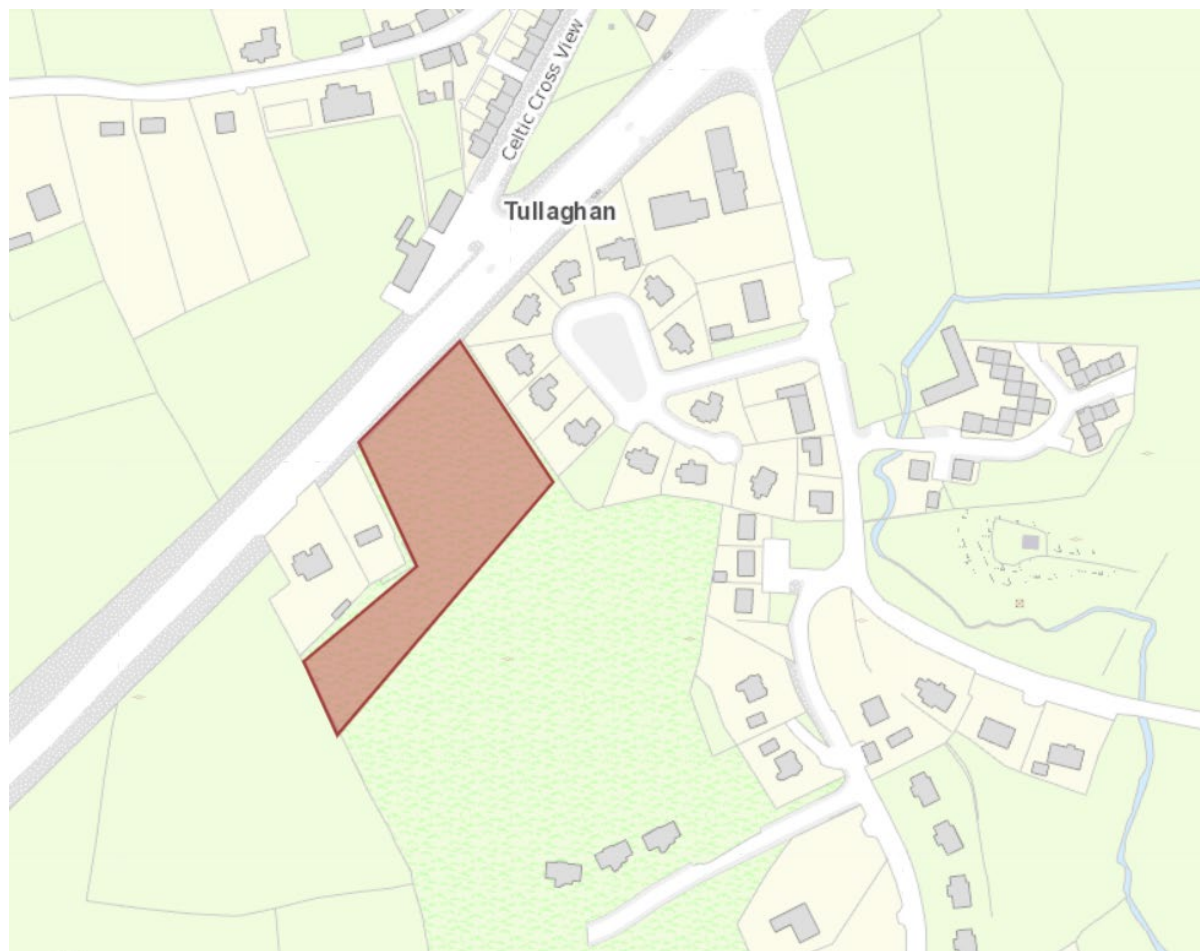
Recommendation No. 138: Extend the settlement boundary to include the remainder of the field and zone as *New Residential*.



7.11 Tullaghan

Submission no.	DLCDP-10
Submitted by:	Stephen McIntyre
Theme (s):	Zoning – Tullaghan

Map showing lands subject to Submission:



Summary of Submission:

The submission relates to lands in the townland of Duncarbry within the settlement boundary of Tullaghan. The site was zoned *General Development* in the Leitrim County Development Plan 2015-2021 and is partially zoned for *Mixed Use* in the Draft Plan. It is requested that the lands be not zoned for *Mixed Use*. The submitter is a resident in the nearby Duncarbry Heights housing development and considers that the site is not appropriate for a mixed use land use zoning objective. The basis for the objection relates to additional traffic and safety concerns, impact on residential amenity / privacy, noise and light pollution, infrastructure capacity and potentially lowering property prices arising from such development.

Chief Executive’s Response:

Given the strategic location of the subject lands on the N15 national primary route and to the infill nature of the lands, a flexible zoning designation such as ‘*Mixed Use*’ is seen as suitable land use for these lands which are capable of accommodating a range of uses. A similar approach was taken regarding the lands opposite. Potential impacts on the residential amenities of adjoining landowners



are recognised, however, any prospective planning application will need to mitigate against any such potential impacts.

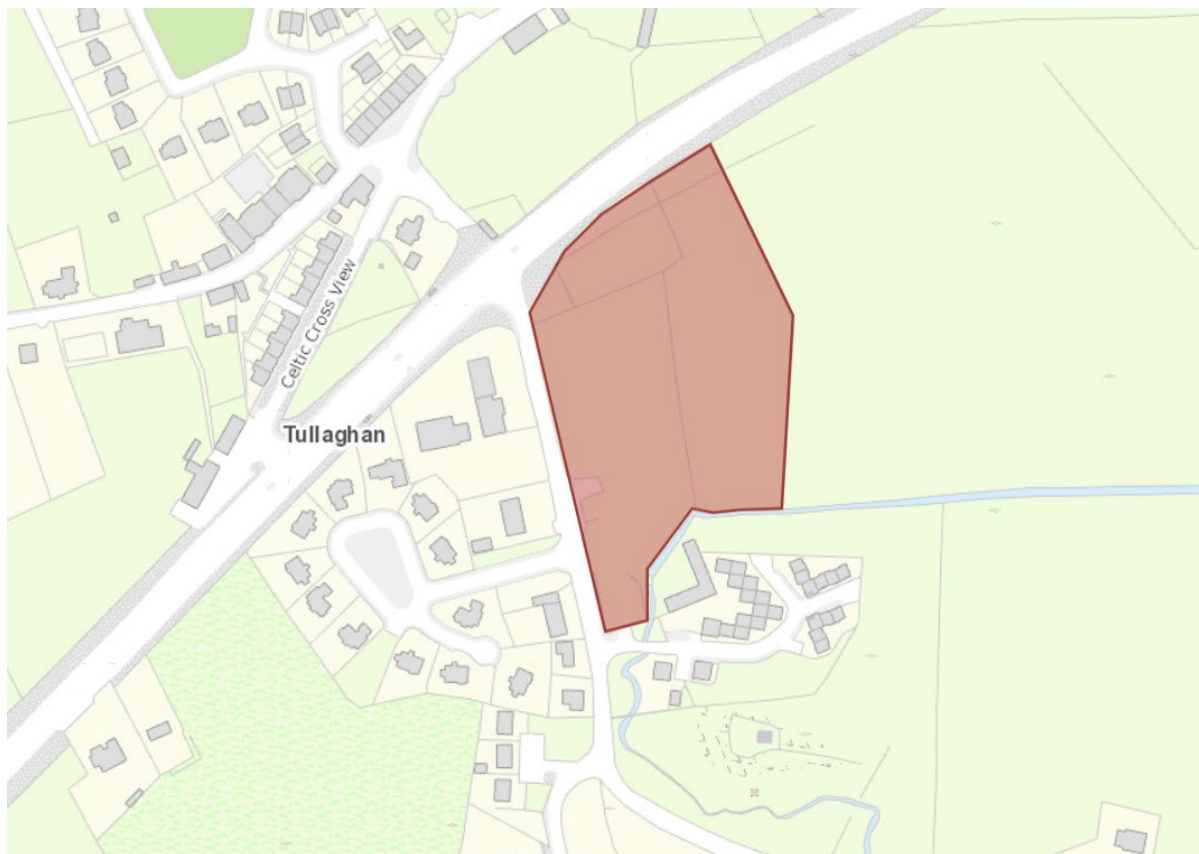
Having regard to the nature of the submission, it was not considered necessary to undertake an infrastructural assessment and land use evaluation assessment.

Chief Executive's Recommendation

No change to the Draft Plan.

Submission no.	DLCDP-54
Submitted by:	Eamon Barrett
Theme (s):	Zoning – Tullaghan

Map showing lands subject to Submission:



Summary of Submission:

The submission relates to lands in the townland of Duncarbry within the settlement boundary of Tullaghan. The site was zoned *Residential Reserve/Support* in the Leitrim County Development Plan 2015-2021 and is partially zoned for *Enterprise and Employment* in the Draft Plan. It is requested that the lands are identified instead for residential use. The submitter is not an effected landowner but has indicated that he is an auctioneer (Conlan Barrett Auctioneers Ltd.) based in Bundoran. The basis for this request is based on perceived shortage of accommodation / housing in the area and levels of demand when stock is available.

Chief Executive’s Response:

The plot of land identified measures approximately 1.9 ha in size. In terms of potential residential yield, the Core Strategy of the Draft Plan has identified possible densities of 15 units/ha for residential lands and 10 units/ha for low density/infill sites in Tier 3 Key Villages such as Tullaghan. If the proposed site was zoned for residential purposes, it would equate to the provision of 29 no. residential units. If a low-density residential zoning were applied, it would equate to the provision of 19 no. residential units.

The lands identified in Tullaghan for new housing relate to the completion of ‘*Aigean Croith*’ housing development which can be considered as a brownfield site. This was permitted as a housing development of 15 no. units, 3 no. of which were completed and occupied. The yield of development



which is expected to be realized from the lands identified is therefore less than the yield for other Villages contained in Table 2.6 but considered appropriate for the scale and character of the village. It is also considered that the lands identified for *Mixed Use* could also yield additional residential units.

By designating residential zoning on these lands, it would necessitate an allocation of housing units from the Core Strategy and as a result would potentially reduce the allocations available to other towns, villages and rural areas in the county. It is considered that the approach taken in the Core Strategy outlines the most sustainable and balanced approach to the future development of both the urban and rural areas of the county, and in respect of Tullaghan, the approach is consistent with the established pattern and character of the area.

The proposed zoning of the subject lands in the Draft Plan was in recognition of the strategic positioning of the subject lands adjoining the N15 National Primary Road with access provided off the local road. The lack of land identified previously in the village for enterprise and employment was accepted by the Planning Authority following consideration of the Chief Executive's Draft Plan by the Elected Members. The Planning Authority remain of this opinion notwithstanding the submission received.

Having regard to the nature of the submission, it was not considered necessary to undertake an infrastructural assessment and land use evaluation assessment.

It is considered that the approach taken in the Core Strategy to consolidate our existing villages outlines the most sustainable and balanced approach to the future development of the county.

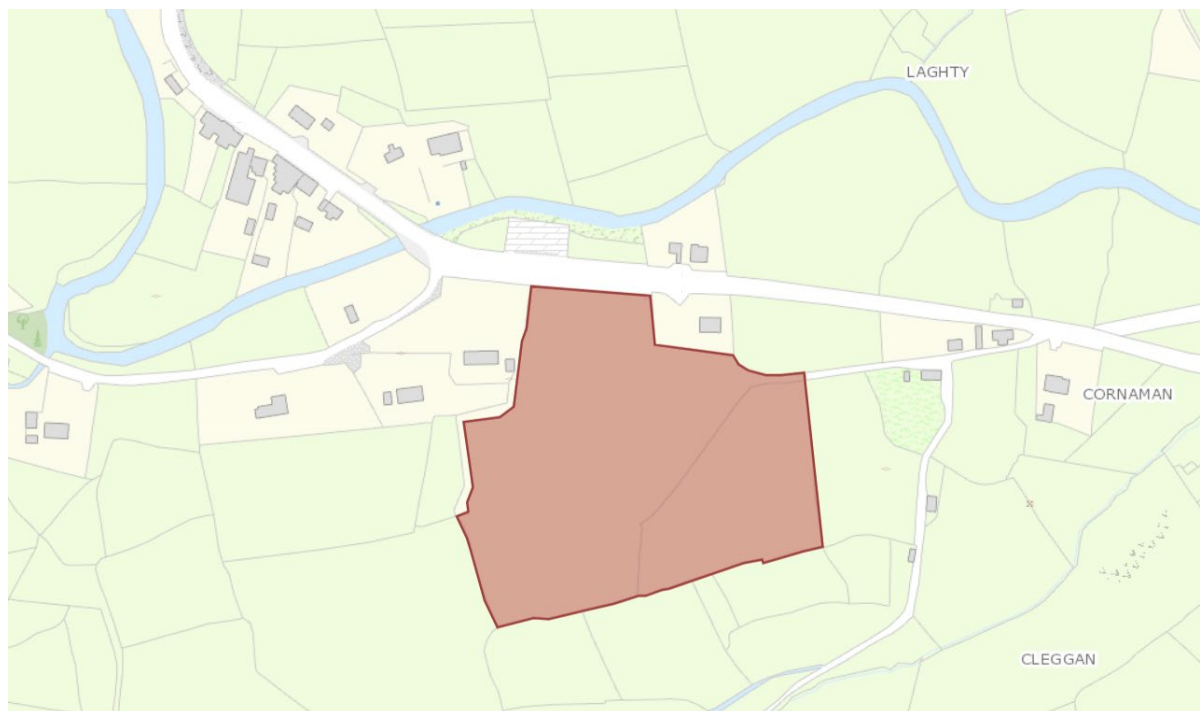
Chief Executive's Recommendation

No change to the Draft Plan.

7.12 Glenfarne

Submission no.	DLCDP-75
Submitted by:	Patrick Fee
Theme (s):	Zoning – Glenfarne

Map showing lands subject to Submission:



Summary of Submission:

The submission relates to lands in the townland of Cornaman in the settlement boundary of Glenfarne (Sranagross). Part of the lands have been included in the settlement boundary for Glenfarne (Sranagross) in the Leitrim County Development Plan 2015-2021 as well as in the Draft Plan and has been given a *General* zoning. It is requested to extend the settlement boundary to include all the lands as outlined above.

Chief Executive’s Response:

Glenfarne is identified as a Tier 4 Village in the Settlement Hierarchy of the Draft Plan. The strategy for all such settlements is to encourage small scale, incremental residential growth that reflects the rural nature of the settlement. The nature of these settlements, in terms of their character and community infrastructure, are considered to provide potential opportunities for low density residential development as a viable alternative to single housing in the open countryside. The provision of such developments will contribute to the principle of compact growth.

This pattern of development aims to consolidate the built environment of the settlements, maximise the efficient use of existing and future infrastructure and promote sustainability, active travel and make more efficient use of underutilised lands. It is the vision of this Plan, that each and every settlement throughout the county should develop to its full potential, in accordance with the principles of proper planning and sustainable development.

In terms of the lands outlined in the submission, they form part of the same landholding as the lands that have been included in the settlement boundary along the N16. Having regard to the topographical levels of the lands already included in the boundary and the established building line of adjacent properties, it would be difficult for these lands to achieve any real development potential. The inclusion of additional lands at this location would allow for a more appropriate access to a small scale residential development that would reflect the rural nature of the settlement itself.

Infrastructural assessment and land use evaluation

Roads	Footpath	Water Supply	Waste Water	Compact Growth	Co-ordinated Development
1	2	1	0	✓	✓

Pending the resolution of a wastewater solution to serve this village, it is considered that the site is in all other respects acceptable to the Planning Authority. It is considered important that lands are identified within the settlement which are not at risk of flooding to allow an appropriate scale of development to proceed within this life of the Plan.

Chief Executive’s Recommendation

Recommendation No. 139: Extend the settlement boundary to include the lands as outlined in the submission.

Recommendation No. 140: Amend Objective GE 1 of the Glenfarne Settlement Plan (Section 19 of Volume II – Settlement Plans) as follows:

GE 1 Facilitate the provision of serviced sites and infill opportunities within the development envelope of Glenfarne **with a site identified in Sranagross opposite the playground along with the unfinished housing development at Brockagh Lower. RUR SET OBJ 6 is also of particular relevance in this regard.**

Existing Draft Plan

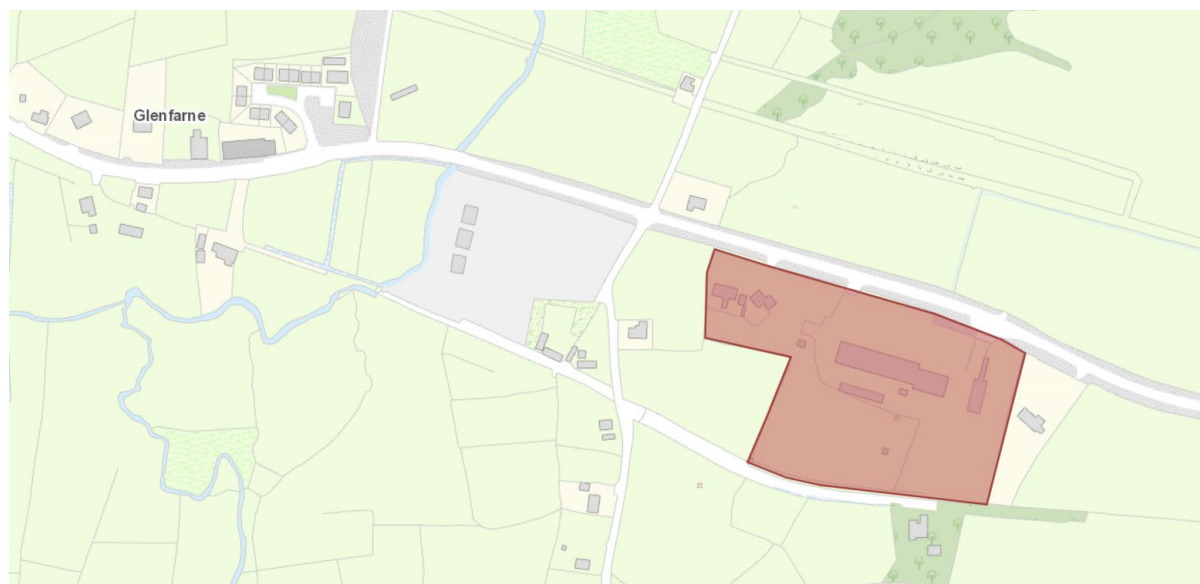


Proposed Amendment



Submission no.	DLCDP-209
Submitted by:	Glenfarne Wood Products
Theme (s):	Zoning – Glenfarne

Map showing lands subject to Submission:



Summary of Submission:

The submission relates to lands in the townland of Annagh (ED Cloonclare) outside the settlement boundary of Glenfarne (Brockagh Lower). The lands were not included in the settlement boundary for Glenfarne (Brockagh Lower) in the Leitrim County Development Plan 2015-2021 and are also outside the boundary as identified in the Draft Plan . It is requested to extend the settlement boundary to include all the lands as outlined.

Chief Executive’s Response:

It is noted that the lands in question are approximately 150m outside of the boundary as defined in the Draft Plan. A key principle of the NPF and RSES is to promote consolidation of existing settlements and more compact forms of growth. As such, it is an objective of the Draft Plan, in line with national and regional policy, to facilitate infill and brownfield development within the existing built footprint of urban settlements. There is an existing business operating at this location and it is considered that this facility can operate without the need for specific zoning to apply.

Infrastructural assessment and land use evaluation

Roads	Footpath	Water Supply	Waste Water	Compact Growth	Co-ordinated Development
1	0	1	0	x	x

Consideration was given to the need for the inclusion of a specific objective in relation to access onto the national route through the exceptional circumstances provision Government policy regarding access onto national roads as provided for in the “Spatial Planning & National Roads Guidelines” seeks to avoid the creation of any additional access point from new development/intensification of traffic from existing entrances onto national roads outside the 60 km/hr speed limit. Section 2.6 of the guidelines provides for exceptional circumstances to the above general policy provision. Planning Authorities may identify stretches of national roads where a less restrictive approach may be applied



as part of the Development Plan process. It is not considered that the subject site is of sufficient scale to require such an inclusion in the Development Plan.

Chief Executive's Recommendation

Recommendation No. 141: Include Objective GE10 of the Glenfarne Settlement Plan (Volume II – Settlement Plans) as follows and renumber subsequent objectives accordingly:

GE 10 To facilitate the continued operation of Glenfarne Wood Products located adjoining the development envelop of Glenfarne (Brockagh Lower). The Planning Authority will facilitate the adaptation / change of use of underutilized buildings and expansion of the existing facility / uses on site to other enterprise and employment uses subject to normal planning considerations and in consultation with Transport Infrastructure Ireland.

7.13 Keshcarrigan

Submission no.	DLCDP-39
Submitted by:	Mel Heeran
Theme (s):	Zoning – Keshcarrigan

Map showing lands subject to Submission:



Summary of Submission:

The submission relates to lands in the townland of Keshcarrigan outside the settlement boundary of Keshcarrigan. The lands were included in the settlement boundary for Keshcarrigan in the Leitrim County Development Plan 2015-2021 with a *General* zoning and is not included in the settlement boundary in the Draft Plan. It is requested to extend the settlement boundary to include the lands as outlined.

Chief Executive’s Response:

The NPF and the RSES place emphasis on the need for compact, smart and sustainable growth within existing urban footprints, thus reducing the amount of greenfield land required to meet future housing requirements. It is therefore appropriate that sustainable planning criteria are used to inform the assessment of each site. The sequential approach specifies that the zoning of lands shall extend outwards from the centre of an urban area with undeveloped lands closest to the core and on public transport routes being given preference, encouraging infill opportunities, and that areas to be zoned shall be contiguous to existing zoned development lands.

Each of the settlements included in Volume II of the Draft County Development Plan is defined by a development boundary wherein, development is generally encouraged in an orderly sequential

manner, extending outwards from the core. The identified settlement boundaries will manage the expansion of the settlements whilst allowing settlement cores to be developed in a manner consistent with existing character of each individual location. The pattern of development aims to consolidate the built environment of the settlements, maximise the efficient use of existing and future infrastructure and promote sustainability, active travel and make more efficient use of underutilised lands.

A Strategic Flood Risk Assessment was prepared as part of the preparation of the Draft County Development Plan which indicates areas of pluvial flooding with adjoining lands indicated to be within Flood Zones B. Owing to the peripheral location of the lands, together with their vulnerability to potential flooding, it is recommended that there is no change to the Draft Plan on foot of this submission. In addition, Irish Water have indicated in their most recent Wastewater Capacity register that there is no capacity in the wastewater treatment plant serving Keshcarrigan to accommodate additional development and no timescale in which they expect this situation to be remedied.

Infrastructural assessment and land use evaluation

Roads	Footpath	Water Supply	Waste Water	Compact Growth	Co-ordinated Development
1	2	1	0	✘	✘

Chief Executive’s Recommendation

No change to the Draft Plan.

Submission no.	DLCDP-40
Submitted by:	Mel Duignan
Theme (s):	Zoning – Keshcarrigan

Map showing lands subject to Submission:



Summary of Submission:

The submission relates to lands in the townland of Keshcarrigan within the settlement boundary of Keshcarrigan. The lands were included in the settlement boundary for Keshcarrigan in the Leitrim County Development Plan 2015-2021 with a *General* zoning and are zoned as both *General* and *Open Space and Amenity* in the Draft Plan. It is requested to zone the lands for general development.

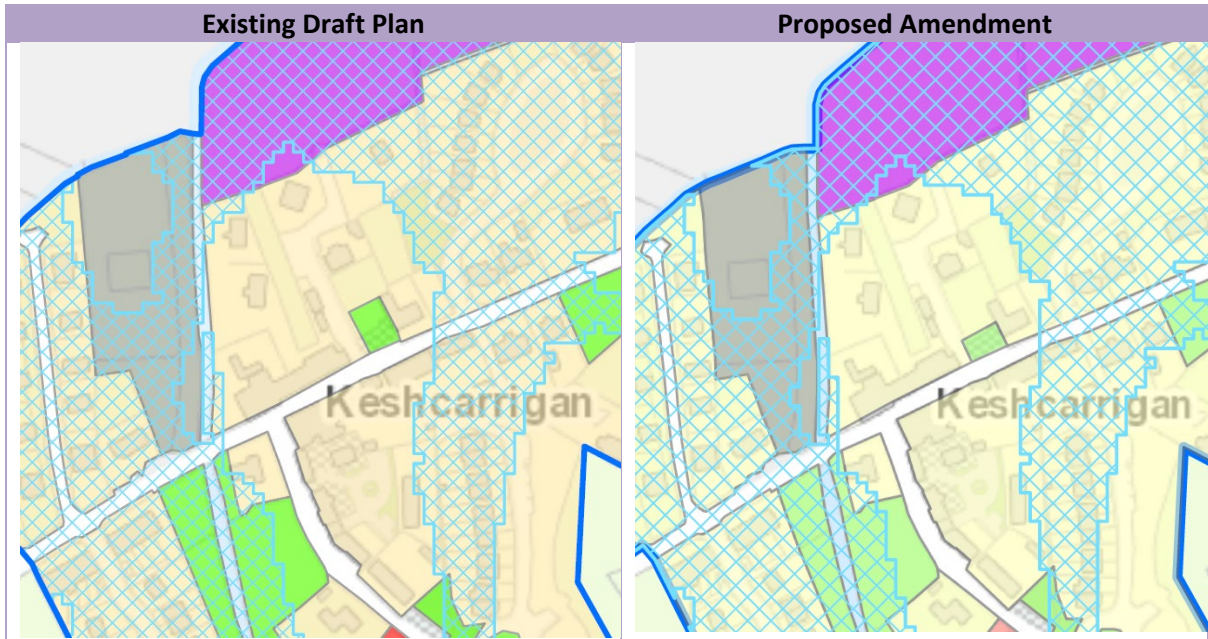
Chief Executive’s Response:

The lands are located in the centre of Keshcarrigan. It is considered that the extent of lands identified as *Open Space* should extend only to the extent of hard surfaced area adjoining the former Garda station which is a Protected Structure. This area forms part of the public realm whereas the lands behind are in the private ownership of the submitter. It is considered appropriate that they are zoned for *General* use.

It is not considered that an infrastructural assessment and land use evaluation is required for this submission having regard to the scale of the additional lands the subject of this submission.

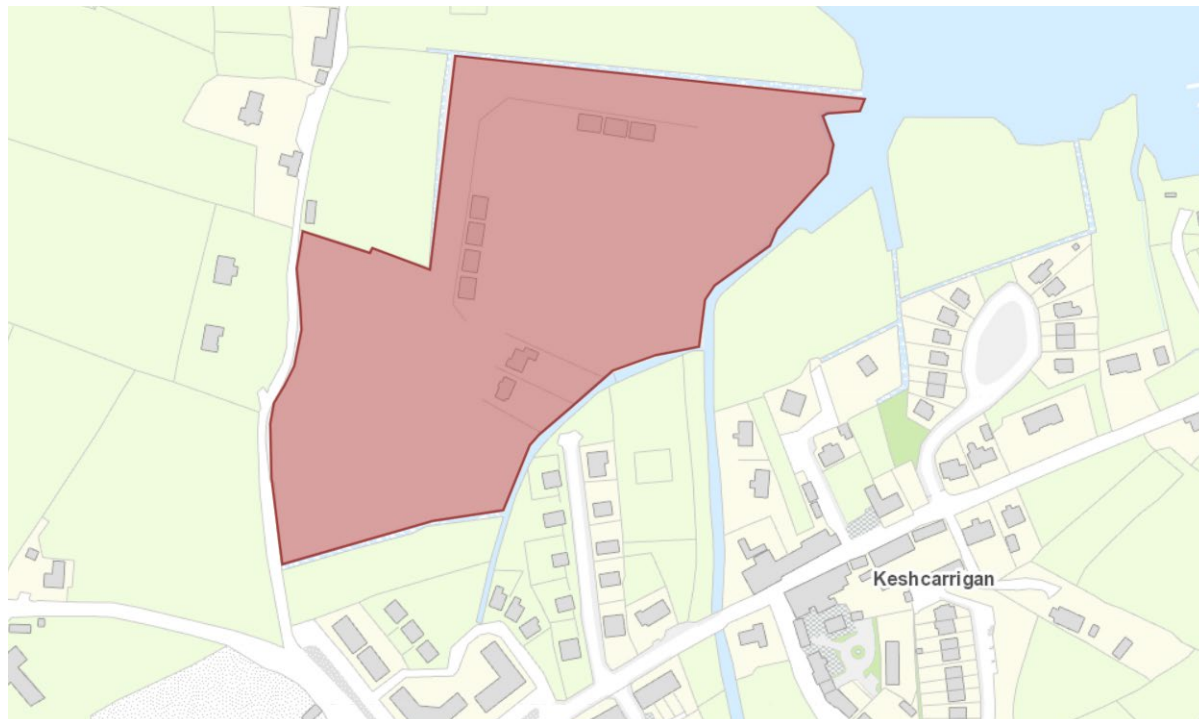
Chief Executive’s Recommendation

Recommendation 142: Change of zoning of the lands identified in the submission from *Open Space and Amenity* to *General*.



Submission no.	DLCDP-41
Submitted by:	Darragh Cafferky
Theme (s):	Zoning – Keshcarrigan

Map showing lands subject to Submission:



Summary of Submission:

The submission relates to lands in the townland of Gowly outside the settlement boundary of Keshcarrigan. The lands were included in the settlement boundary for Keshcarrigan in the Leitrim County Development Plan 2015-2021 and zoned as *Tourism Related Development*. The lands are outside the settlement boundary as identified in the Draft Plan. It is requested to extend the settlement boundary and zone the lands for ‘*General Development*’.

Chief Executive’s Response:

The NPF and the RSES place emphasis on the need for compact, smart and sustainable growth within existing urban footprints, thus reducing the amount of greenfield land required to meet future housing requirements. It is therefore appropriate that sustainable planning criteria are used to inform the assessment of each site. The sequential approach specifies that the zoning of lands shall extend outwards from the centre of an urban area with undeveloped lands closest to the core and on public transport routes being given preference, encouraging infill opportunities, and that areas to be zoned shall be contiguous to existing zoned development lands.

Each of the settlements included in Volume II of the Draft County Development Plan is defined by a development boundary wherein, development is generally encouraged in an orderly sequential manner, extending outwards from the core. The identified settlement boundaries will manage the expansion of the settlements whilst allowing settlement cores to be developed in a manner consistent with existing character of each individual location. The pattern of development aims to consolidate the built environment of the settlements, maximise the efficient use of existing and future infrastructure and promote sustainability, active travel and make more efficient use of underutilised lands.

A Strategic Flood Risk Assessment was prepared as part of the preparation of the Draft County Development Plan which indicates areas of pluvial flooding with adjoining lands indicated to be within Flood Zones B. In addition, Irish Water have indicated in their most recent Wastewater Capacity register that there is no capacity in the wastewater treatment plant serving Keshcarrigan to accommodate additional development and no timescale in which they expect this situation to be remedied.

Owing to the peripheral location of the lands, together with their vulnerability to potential flooding it is recommended that there is no change to the Draft Plan on foot of this submission. The Planning Authority is conscious of the previous planning permission which was granted for the subject lands and to the incomplete nature of the development for approximately 15 years with no sign of a resolution. It is accepted that the site is a brownfield site. On foot of the issue relating to wastewater capacity and to the vulnerability of residential use to the risks of flooding, it is not considered appropriate to accede to the proposed land use zoning submission. The resolution of the development would be considered on its merits should a planning application be made to the Planning Authority noting that the existing County Development Plan remains in effect until March of next year. However, such an application would have to address in a most comprehensive manner the modelled flood risk associated with the site and a resolution of the capacity of the wastewater treatment plant.

Infrastructural assessment and land use evaluation

Roads	Footpath	Water Supply	Waste Water	Compact Growth	Co-ordinated Development
1	2	2	0	N.A.	✓

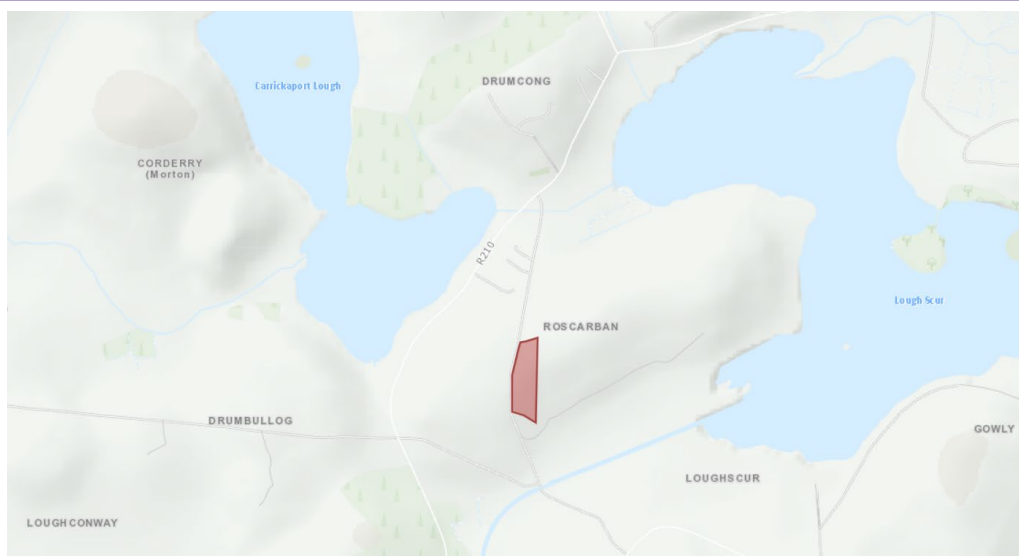
Chief Executive’s Recommendation

No change to the Draft Plan.

7.14 General Zoning Submissions

Submission no.	DLCDP-2
Submitted by:	Tommy Kelly
Theme (s):	Zoning

Map showing lands subject to Submission:



Summary of Submission:

The submission relates to lands in the townland of Roscarban to the south of the proposed settlement boundary for Drumcong village. It is submitted to include these lands in the Development Plan to allow for housing for family members.

Chief Executive’s Response:

The lands identified in the submission are located to the south of the settlement boundary as identified in the Draft Leitrim County Development Plan 2023-2029.

Drumcong is identified as a Tier 4 Village in the Settlement Hierarchy of the Draft Plan. The strategy for all such settlements is to encourage small scale, incremental residential growth that reflects the rural nature of the settlement. The nature of these settlements, in terms of their character and community infrastructure, are considered to provide potential opportunities for low density residential development as a viable alternative to single housing in the open countryside. The provision of such developments will contribute to the principle of compact growth.

As part of this evidence-based approach to the identification of lands for residential development an Infrastructural Assessment and Land Use Evaluation was carried out. This assessment is based on a range of criteria including infrastructure availability/constraints, the proximity of the lands to existing services and facilities, and any environmental constraints that may impede or restrict the development of the lands.

Infrastructural assessment and land use evaluation

Roads	Footpath	Water Supply	Waste Water	Compact Growth	Co-ordinated Development
1	0	1	2	✘	✘



It should be noted that the lands are not located within an area identified as “under Urban influence” in the Draft Plan and general rural housing policies apply. The policies included in the Draft Plan in relation to rural housing are generally favourable towards the provision of rural dwellings subject to on-site technical requirements being achieved.

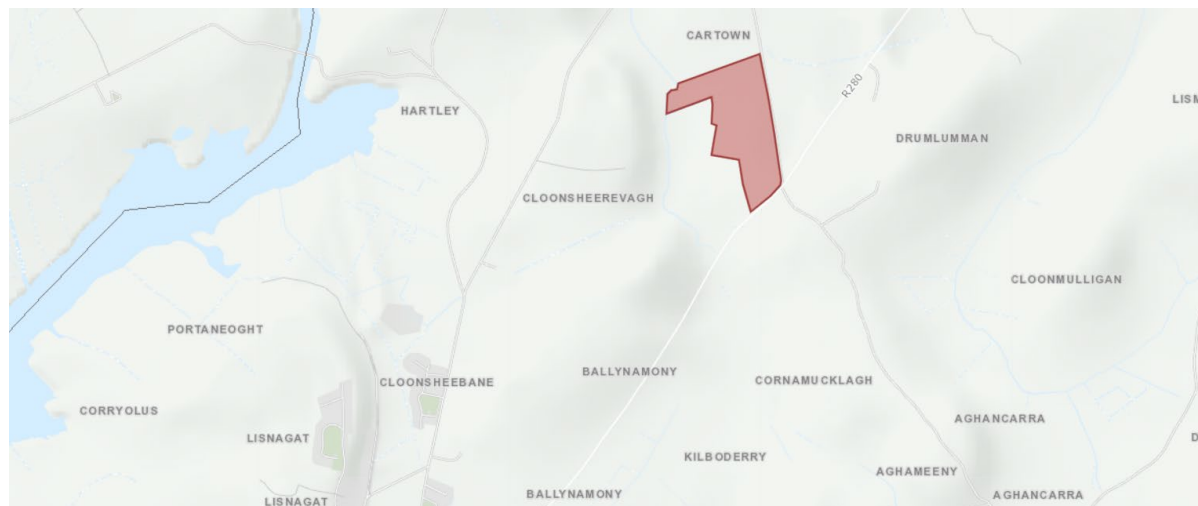
As the site has failed the infrastructural assessment and land use evaluation, no change is recommended on foot of this submission.

Chief Executive's Recommendation

No change to the Draft Plan.

Submission no.	DLCDP-74
Submitted by:	John Kelly
Theme (s):	Zoning

Map showing lands subject to Submission:



Summary of Submission:

The submission relates to lands in the townland of Cartown approximately 2km northeast of Carrick-on-Shannon. There is a former hotel/night club located on the subject lands. It is requested to zone the lands for ‘Enterprise and Employment’ land use zoning objective.

Chief Executive’s Response:

The lands identified in the submission are located approximately 2km northeast of Carrick-on-Shannon and are served by the R280 regional road. The lands are not proximate to any of the settlements that have been included in the settlement hierarchy of the Draft Plan. The NPF and the RSES place emphasis on the need for compact, smart and sustainable growth within existing urban footprints, thus reducing the amount of greenfield land required to meet future housing requirements. It is therefore appropriate that sustainable planning criteria are used to inform the assessment of each site. The sequential approach provides that the zoning of lands shall extend outwards from the centre of an urban area with undeveloped lands closest to the core and on public transport routes being given preference, encouraging infill opportunities, and that areas to be zoned shall be contiguous to existing zoned development lands. There is a permitted use on these lands and it is considered that this facility can operate without the need for specific zoning to apply. Any alternative use proposed would have to be considered on its merits and having regard to the policy framework for rural development contained within the Draft Plan.

Infrastructural assessment and land use evaluation

Roads	Footpath	Water Supply	Waste Water	Compact Growth	Co-ordinated Development
1	0	1	0	✘	✘

Chief Executive’s Recommendation

As the site has failed the infrastructural assessment and land use evaluation, no change is recommended on foot of this submission.

Submission no.	DLCDP-189
Submitted by:	Gerry Creamer
Theme (s):	Zoning

Map showing lands subject to Submission:

n/a

Summary of Submission:

While no specific lands have been identified, the submission requests that lands that were previously zoned as residential should be zoned residential reserve in the new Plan.

Chief Executive’s Response:

The NPF and the RSES place emphasis on the need for compact, smart and sustainable growth and requires 30% of all new housing to be within existing urban footprints, thus reducing the amount of greenfield land required to meet future housing requirements. It is therefore appropriate that sustainable planning criteria are used to inform the assessment of each site. The sequential approach provides that the zoning of lands shall extend outwards from the centre of an urban area with undeveloped lands closest to the core and on public transport routes being given preference, encouraging infill opportunities, and that areas to be zoned shall be contiguous to existing zoned development lands.

Each of the settlements included in Volume II of the Draft County Development Plan is defined by a development boundary wherein, development is generally encouraged in an orderly sequential manner, extending outwards from the core. The identified settlement boundaries will manage the expansion of the settlements whilst allowing settlement cores to be developed in a manner consistent with existing character of each individual location. The pattern of development aims to consolidate the built environment of the settlements, maximise the efficient use of existing and future infrastructure and promote sustainability, active travel and make more efficient use of underutilised lands.

It is considered that the approach taken in the Core Strategy to consolidate our existing villages outlines the most sustainable and balanced approach to the future development of the county. Where considered appropriate and the lands are not subjected to flood risk, topographical constraints and have passed the infrastructural assessment and land use evaluation, the majority of existing lands zoned for residential use have been retained. The adequacy of the quantum of lands identified for residential use will be reconsidered as part of the preparation of the progress report on realising the objectives of the Draft Plan / review of Housing Strategy which occurs 2 years after the Plan taking effect.

Chief Executive’s Recommendation

No change to the Draft Plan.

7.15 Additional Land Use Zoning Objective

Submission no.	Chief Executive Amendment
Submitted by:	Leitrim County Council
Theme (s):	Zoning
Map showing lands subject to Submission:	

n/a

Summary of Submission:

Inclusion of *General* land use zoning objective in Table 6.1 *Land Use Zoning Objectives*, Table 6.2 *Land Use Zoning Objectives Guidance* and Table 6.5 *Land Use Zoning Matrix* in Volume I of the Draft Plan suite of documents.

Chief Executive’s Response:

Whilst the land use zoning objective, *General*, is included in a number of land use zoning objective maps contained in Volume III *Book of Maps* of the Draft Plan, a reference to its objective wording, guidance and land use application was mistakenly omitted from Tables 6.1, 6.2 and 6.5, of the final published version of the Draft Plan. In the interests of transparency, this report provides an opportunity to amend this clerical error in referencing this land use objective in the aforementioned tables.

Chief Executive’s Recommendation

Recommendation No. 143:

Amend Table 6.1 of Volume I of the Draft Plan as follows:

Table 6.1: Land Use Zoning Objectives

Land Use Zoning	Objective
Town/Village Centre	To maintain and enhance the vitality and viability of existing town and village centres through consolidation with an appropriate mix of retailing, commercial, cultural and residential activities.
Mixed Use	To provide for a mixture of residential and compatible commercial uses.
Existing Residential	To protect and enhance the established amenity of existing residential communities.
New Residential	To provide primarily for new residential development and community services at appropriate densities for the positioning of the centre in the Settlement Hierarchy and with an emphasis on quality of design.
Enterprise and Employment	To provide for enterprise and employment creation.
General	To protect and promote the character of the Rural Village and promote a vibrant community appropriate to available physical and community infrastructure.
Open Space and Amenity	To preserve, provide for and improve active and passive recreational public and private open space.

Land Use Zoning	Objective
Social and Community	To protect and provide for community, social, recreational and educational services and facilities.
Tourism Related Development	To provide for and improve tourist amenities in the county. (See Note A)
Utilities	To provide land for public infrastructure and public utilities.
Agriculture	To provide for agriculture in a manner which protects the amenity of adjoining land uses.
Constrained Land Use	To ensure the appropriate management and sustainable use of flood risk areas designated as ‘Constrained Land Use’ on Settlement Plans.

Note A - Only water compatible tourism use will be considered on undeveloped lands in Flood Zone A.

Recommendation No. 144:

Amend Table 6.2 of Volume I of the Draft Plan as follows:

Table 6.2: Land Use Zoning Objectives Guidance

Land Use Zoning	Guidance
Town/Village Centre	The Council will encourage and facilitate the development of under-utilised land and brownfield sites creating a mix of uses to make the town and village centres attractive places to visit, shop and live in. The full use of upper floors in buildings, preferably for residential use, will be encouraged. The character of the town and village centres shall be protected and enhanced. Development proposals should provide a use, scale, form and design that accords with the role, function and size of the town or village centre. These areas require high levels of accessibility by all modes, including pedestrian, cyclist and public transport (where feasible).
Mixed Use	A diversity of uses for both day and evening are encouraged. These areas also require high levels of accessibility for all modes, including pedestrian, cyclists and public transport (where feasible). Compatible uses within this zone includes residential, community buildings, civic buildings, entertainment, hotels, leisure and recreation, offices, professional/specialist services and restaurants. In determining the suitability of development within this zone, regard shall be given to the environmental impact of the proposed development on neighbouring uses.
Existing Residential	This zoning allows for the conservation and enhancement of the quality and character of existing residential areas, to protect residential amenities and to allow for infill development which is appropriate to the character and pattern of development in the area. This zone is intended primarily to protect established housing development but may include a range of other uses particularly those that have the

Land Use Zoning	Guidance
	<p>potential to support the residential function of residential communities such as schools, crèches, small shops, doctor’s surgeries, amenities, etc.</p>
<p>New Residential</p>	<p>High-quality residential schemes are encouraged with convenient and safe access to local services and the creation of a safe and pleasant local environment. New housing and infill developments should be of sensitive design, which are complementary to their surroundings. Adequate undeveloped lands have been zoned in the Plan for residential use to meet the requirements for both public and private house building over the Plan period. The Council will strive towards the ideal of mixed residential neighbourhoods, where people of different social and economic backgrounds and of different ages can live in proximity and harmony to one another.</p> <p>This zone is intended primarily for housing development but may include a range of other uses particularly those that have the potential to foster the development of new residential communities The Planning Authority will therefore consider favourably other appropriate uses which support the overall residential function of the area. The range of uses identified above in ‘Existing Residential’ zones are also appropriate in ‘New Residential’ zones.</p>
<p>Enterprise and Employment</p>	<p>This zoning promotes the development of employment uses that reinforce the enterprise and employment function of the subject area and require high environmental and design standards. The identification of such lands has been chosen to cluster the heavier, traffic generating activities, associated with certain types of enterprise such as industrial uses or those which require a substantial footprint associated with their function, towards the edge of centres, with good road access while ensuring minimal impact on residential areas.</p> <p>Care will be exercised by the Planning Authority in the consideration of the appropriateness of proposals seeking to develop heavy industry with environmental emissions, including noise and odour with regard to the impact of such uses on adjoining more sensitive uses and on the form of established development within such zones. Where any industrial development adjoins other land uses, Leitrim County Council will require that a buffer zone is provided for and landscaped in accordance with the Development Management Standards of this Plan.</p> <p>Where employment is a high generator of traffic, the location of new employment at appropriate scale, density, type and location will be encouraged to reduce the demand for travel.</p> <p>Residential or retail uses (including retail warehousing) will not be acceptable in this zone other than retail ancillary to another use such as showrooms.</p>
<p>General</p>	<p>The ‘General’ land use zoning objective is provided within the Tier 4 settlements, Villages, and defines the extent of the settlement. It is different therefore in nature to the land use zoning objectives contained in the settlements in higher tiers. The objective seeks to protect and promote established villages within the rural area where housing needs can be addressed relative to their catchment and local services and smaller scale rural enterprises are to be provided. Population/growth will be managed through</p>



Land Use Zoning	Guidance
	<p>the Core Strategy to ensure sustainable population levels without providing for growth beyond local need and unsustainable commuting patterns.</p> <p>This land use zoning objective therefore provides for a range of potential land uses that can be accommodated in such settlements, at a scale commensurate with the level of existing development within the respective settlement. Such lands uses can include residential, commercial activity and enterprise and employment uses. This land use zoning objective reflects the need for a degree of flexibility to be employed in the future development of these smaller-scale settlements.</p> <p>In determining the suitability of proposed development within this zoning designation, regard shall be had to the potential adverse impacts on the receiving environment, including existing or neighbouring uses, infrastructural capacity demands, as well as environmental, ecological and amenity considerations.</p> <p>Whilst allowing for residential land use, it is not considered that such lands would be considered to be within the scope of ‘Residential’ or ‘Mixed Use’ land use zoning to which the provisions of Residential Zoned Land Tax (provision of Part 22A of the Taxes Consolidation Act 1997) would apply.</p>
<p>Open Space and Amenity</p>	<p>The use of land shall include the provision of land for parks, public woodland, pedestrian routes and greenways, riparian zones, development incidental to the enjoyment of open space (including playgrounds, outdoor recreation centres and sports centres, civic/market square, village greens, landscaped areas, shelters, sanitary conveniences, play equipment, dressing rooms and similar facilities). It also provides for the use of such land or such facilities for games, educational and recreational purposes. High standards of accessibility are essential.</p> <p>The Council will not normally permit development that would result in a loss of existing open space.</p>
<p>Social and Community</p>	<p>In addition to identifying lands to safeguard their future provisions, these lands also contain existing community and social facilities such as community buildings, schools, hospitals and health centres, places of worship, football pitches and other generic or specific civic, social and community uses where the objective of the Planning Authority will be to protect such uses.</p>
<p>Tourism Related Development</p>	<p>These lands seek to provide for developments linked to tourism including all types of accommodation - guesthouses, hotels, hostels, holiday homes, etc, along with restaurants, pubs and other tourism related offerings.</p> <p>Note: Only water compatible tourism use will be considered on undeveloped lands in Flood Zone A.</p>
<p>Utilities</p>	<p>This zoning primarily provides for and preserves land in the ownership of the Council or other bodies charged with the provision of services such as electricity, telecommunications, water, wastewater etc. to individual towns and villages.</p>

Land Use Zoning	Guidance
Agriculture	These are lands within the development envelope for which there is no current need for an identifiable use or on the basis of their topography or risk of flooding are not considered appropriate for an alternative use. The lands are currently used for agriculture and can continue to be used for this purpose.
Constrained Land Use	See separate section below (Section 6.10.4)

Recommendation No. 145:

Amend Table 6.5 of Volume I of the Draft Plan as follows:

Table 6.5: Land Use Zoning Matrix

Land Use	Town/Village Centre	Mixed Use	Existing Residential	New Residential	Enterprise & Employment	General	Open Space & Amenity	Social & Community	Tourism-Related Development	Utilities	Agriculture
Allotments	N	O	O	O	N	O	O	Y	O	N	Y
Amusement Arcade	O	O	N	N	N	O	N	N	O	N	N
Builder Providers	N	O	N	N	Y	O	N	N	N	N	N
Business and Technology Units	N	O	N	O	Y	O	N	O	N	N	N
Care Home	O	Y	Y	Y	N	Y	N	O	N	N	N
Car Park	Y	Y	N	N	O	Y	O	O	O	O	N
Cattle Shed/Slatted Units	N	N	N	N	N	N	N	N	N	N	O
Cemetery	N	N	N	N	N	O	O	Y	N	N	O
Childcare Facilities	Y	Y	O	Y	O	Y	N	Y	N	N	N
Cinema/Dancehall	Y	Y	N	N	N	O	N	O	O	N	N
Civic and Public Building	Y	Y	O	O	N	Y	O	Y	O	N	N
Community Facilities	Y	Y	O	O	N	Y	O	Y	O	N	N
Cultural Uses/Library	Y	Y	Y	Y	N	Y	O	Y	O	N	N
Distribution Depot	N	O	N	N	Y	O	N	N	N	N	N
Dwelling	Y	Y	Y	Y	N	Y	N	O	N	N	O
Educational Facilities	Y	Y	O	O	N	Y	O	Y	N	N	O
Funeral Home	O	O	O	O	O	Y	N	Y	N	N	N
Garage/Car Repairs	N	O	N	N	Y	O	N	N	N	N	N
Guest House/Hotel/Hostel	Y	Y	Y	Y	N	Y	N	O	Y	N	N
Halting Site	N	N	O	Y	N	O	N	Y	N	N	O
Heavy Commercial Vehicle Park	N	N	N	N	Y	N	N	N	N	N	N
Heavy Industry	N	N	N	N	O	O	N	N	N	N	N
Hot Food Take-Away	Y	O	N	N	N	Y	N	N	O	N	N
Indoor Leisure	Y	Y	N	O	O	O	O	O	O	N	N
Light Industry	N	O	O	O	Y	O	N	N	N	N	N



Land Use	Town/Village Centre	Mixed Use	Existing Residential	New Residential	Enterprise & Employment	General	Open Space & Amenity	Social & Community	Tourism-Related Development	Utilities	Agriculture
Medical Services/Health Centre	Y	Y	O	O	N	Y	N	O	N	N	N
Motor Sales/Car Showroom	O	O	N	N	Y	O	N	N	N	N	N
Off Licence	Y	Y	O	O	N	Y	N	N	O	N	N
Office	Y	Y	O	O	O	Y	N	O	O	N	N
Outdoor Sport/Recreation	O	O	Y	Y	N	Y	Y	Y	Y	N	O
Park/Playground	Y	Y	Y	Y	N	Y	Y	Y	Y	N	O
Place of Worship	Y	Y	Y	Y	O	Y	O	Y	N	N	N
Public House	Y	Y	O	O	N	Y	N	N	Y	N	N
Public Utility/Infrastructure	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
Recreational Buildings/Marina	Y	Y	O	O	Y	Y	Y	Y	Y	N	N
Repository Store Depot	N	O	N	N	Y	O	N	N	N	N	N
Restaurant	Y	Y	O	O	N	Y	N	O	Y	N	N
Retail Warehouse	N	O	N	N	N	Y	N	N	N	N	N
Retirement/Nursing Home	O	Y	Y	Y	N	Y	N	O	N	N	N
Service Station	O	O	O	Y	Y	O	N	N	N	N	N
Shop (Comparison)	Y	Y	N	N	N	Y	N	N	N	N	N
Shop (Convenience)	Y	Y	Y	Y	O	Y	N	N	O	N	N
Solar Energy Development	N	O	N	O	Y	O	N	O	O	Y	O
Stables/Stable Yard	N	N	O	O	N	O	O	N	N	N	O
Telecommunication Structure	O	O	O	O	Y	O	O	O	O	Y	O
Tourism Development	Y	Y	O	O	N	Y	Y	O	Y	N	O
Tourist Camping/Caravan Park	N	N	O	O	N	Y	O	O	Y	N	O
Warehouse (Wholesale)	N	O	N	N	Y	O	N	N	N	N	N
Workshop	O	O	O	O	Y	O	N	O	O	N	O

APPENDIX 1
LIST OF SUBMISSIONS
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Submission Reference Number	Name/Organisation
DLCDP - 1	Rachael Keaney
DLCDP - 2	Tommy Kelly
DLCDP - 3	Martina Healy
DLCDP - 4	Karol McLoughlin
DLCDP - 5	Gerry O'Hagan
DLCDP - 6	Damien Treanor & Cormac McCloskey
DLCDP - 7	Paddy McGrath
DLCDP - 8	Larry McDermott
DLCDP - 9	Paddy McManus & Alan Foley
DLCDP - 10	Stephen McIntyre
DLCDP - 11	Vincent Rogan
DLCDP - 12	Shane Kerrigan
DLCDP - 13	Environmental Protection Agency
DLCDP - 14	Joe Casey
DLCDP - 15	J. Martin McLaughlin
DLCDP - 16	Jennie O' Hara
DLCDP - 17	Department of Rural and Community Development - Libraries Development Unit
DLCDP - 18	Fermanagh & Omagh District Council
DLCDP - 19	Odran Duignan
DLCDP - 20	Mary Flanagan and Michael Brady
DLCDP - 21	Damon King
DLCDP - 22	Glenfarne Community Development; Kiltyclogher Community Council; and Rossinver Youth and Community Project
DLCDP - 23	Transport Infrastructure Ireland
DLCDP - 24	Councillor Enda McGloin
DLCDP - 25	Breda Wynne
DLCDP - 26	Natural Capital Ireland
DLCDP - 27	John Gaffney and Joy O'Reilly
DLCDP - 28	Claire Donlon

DLCDP - 29	Hugh Bracken
DLCDP - 30	Mary Bracken
DLCDP - 31	Gerry Beirne
DLCDP - 32	Gwen Travers
DLCDP - 33	Gerard McPartlan
DLCDP - 34	Marion and James Kelly
DLCDP - 35	Eugene Cox
DLCDP - 36	David Gordon
DLCDP - 37	Department of Transport
DLCDP - 38	Michael and Jenni Garvey
DLCDP - 39	Mel Heeran
DLCDP - 40	Mel Duignan
DLCDP - 41	Daragh Cafferky
DLCDP - 42	John Dowds
DLCDP - 43	Ray Gilmartin
DLCDP - 44	Office of Public Works
DLCDP - 45	Charlotte McKeon
DLCDP - 46	Maureen McGourty
DLCDP - 47	Terry McManus
DLCDP - 48	Save Dough Mountain Group
DLCDP - 49	Ann Walshe
DLCDP - 50	Liam Egan
DLCDP - 51	Fergal McLoughlin
DLCDP - 52	Concerned Residents Tarmon/Drumkeeran Area
DLCDP - 53	Neil Foulkes
DLCDP - 54	Eamon Barrett
DLCDP - 55	Charles Donnellan
DLCDP - 56	Hubert McTernan
DLCDP - 57	Northern and Western Regional Assembly
DLCDP - 58	John Healy
DLCDP - 59	Josephine Lewis

DLCDP - 60	Bernadette McLoughlin
DLCDP - 61	Councillor Des Guckian
DLCDP - 62	Yak Unlimited Company
DLCDP - 63	Fionnbar Cox
DLCDP - 64	Ross McLoughlin
DLCDP - 65	Michelle Lowe
DLCDP - 66	FuturEnergy Ireland
DLCDP - 67	High Level Advisory Group Leitrim
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DLCDP - 69	Adventure Gently
DLCDP - 70	Leitrim Tourism Network
DLCDP - 71	Leitrim Wind Energy Awareness
DLCDP - 72	Tara Cronogue - Killeen
DLCDP - 73	Leitrim Recreation Forum
DLCDP - 74	John Kelly
DLCDP - 75	Patrick Fee
DLCDP - 76	Treasure Leitrim Community Group
DLCDP - 77	Michael Colreavy
DLCDP - 78	Dympna O' Donnell
DLCDP - 79	James Gilmartin
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DLCDP - 100	Robbie Ryan
DLCDP - 101	Ciara Connolly
DLCDP - 102	Karl Moore
DLCDP - 103	Jonas Dellow
DLCDP - 104	Louise Gallagher
DLCDP - 105	Keep Ireland Open
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DLCDP - 107	Sherrie Scott
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DLCDP - 160	Jamie Blessing
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DLCDP - 205	Electricity Supply Board
DLCDP - 206	Corona Morgan
DLCDP - 207	Polly Browne Clarke
DLCDP - 208	The Rabbit's Riot Theatre Company
DLCDP - 209	Glenfarne Wood Products

APPENDIX 2

***LANDSCAPE CAPACITY STUDY
FOR COMMERCIAL FORESTRY
- CO. LEITRIM (MARCH 2022)***

LANDSCAPE CAPACITY STUDY FOR COMMERCIAL FORESTRY – CO LEITRIM



IE000116
Landscape Capacity Study
for Commercial Forestry – Co
Leitrim
F01
14 March 2022

REPORT

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Approval for issue

RH

14 March 2022

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Prepared for:

Leitrim County Council

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Appendices

Appendix A Designated Nature Sites

1 INTRODUCTION

In September 2021, Leitrim County Council commissioned RPS to undertake a landscape capacity assessment for future commercial forestry planting in County Leitrim. The purpose of the landscape capacity assessment is to inform the policy framework for forestry which will be contained in the draft County Development Plan 2023-2029. The objective of the study is to determine the suitability or capacity of landscapes to accommodate further commercial forestry plantations. This study follows a number of landscape studies already undertaken in County Leitrim including a review of the county landscape character assessment, designated landscapes, protected views and prospects all of which are to inform the County Development Plan review.

The study has also been undertaken in order to provide clear guidance in the light of recent debate on the issue of commercial forestry in County Leitrim and the need to achieve a balance between demands for commercial forestry and conservation of landscape character and visual amenity including residential visual amenity.

1.1 Scope

The process followed a series of steps outlined below:

- Consultation with Leitrim County Council on the scope of the landscape capacity study;
- Mapped and written data gathering exercise to establish the baseline;
- Methodology, including definition of criteria for the landscape capacity study;
- Capacity Assessment – evaluation of the sensitivity of each landscape character type and its capacity to accommodate further commercial forestry in the future; and
- Outline design guidance for future commercial forestry plantations.

1.2 Structure of this report

The remainder of this report is structured in two parts as follows:

- Approach and methodology; and
- Landscape capacity study outlining the baseline for each Landscape Character Type (LCT) followed by a sensitivity assessment of each LCT to commercial forestry. The capacity of each LCT to accommodate commercial forestry will be outlined, along with design guidance.

2 APPROACH AND METHODOLOGY

The approach to the landscape capacity study was informed by current good practice guidance including the following:

- 'Forestry and the Landscape Guidelines' The Forest Service, Department of the Marine and Natural Resources, July 2000;
- 'An approach to landscape sensitivity assessment' – to inform spatial planning and land management, 2019, Natural England; and
- 'Design techniques for forest management planning', Practice guide, Forestry Commission, Edinburgh, 2014.

Landscapes are sensitive to change brought about by aspects of commercial forestry plantations especially where these result in a lack of fit with existing landscape character. The lack of fit in the landscape may be derived from factors including site location, choice of species, layout and size and orientation of plot and visual prominence. The baseline for each Landscape Character Type (LCT) in County Leitrim is considered and assessed for its sensitivity to commercial forestry as the basis for the capacity study and is explained in more detail below.

2.1 Capacity study

The capacity study methodology is outlined below. This includes an explanation of the related concepts of landscape sensitivity and landscape capacity drawing upon published guidance in 2019 by Natural England. This guidance is favoured over the more dated national guidance entitled 'Landscape and Landscape Assessment, Consultation Draft of Guidelines for Planning Authorities' published in 2000 by The Department of the Environment and Local Government as it specifically deals with the concept of landscape sensitivity in the context of landscape capacity studies.

This is followed by an outline of the criteria used to assess the sensitivity of the LCTs in Leitrim to commercial forestry and hence provide an understanding of the capacity of these LCTs to accommodate commercial forestry.

2.1.1 Landscape Sensitivity and Landscape Capacity

Landscape sensitivity assessment is a useful tool to inform strategic thinking on the location of future commercial forestry in County Leitrim. As defined by Natural England (NE) '*Landscape sensitivity may be regarded as a measure of the resilience, or robustness, of a landscape to withstand specified change arising from development types or land management practices, without undue negative effects on the landscape and visual baseline and their value – such as changes to valued attributes of baseline landscape character and the visual resource.*'

The NE guidance sets out the relationship between landscape sensitivity and capacity. Landscape sensitivity assessment identifies the relative sensitivity of a landscape to a particular development type (commercial forestry) applying typically a 5 point scale (very high, high, medium, low and very low). This in turn informs place based guidance concerning the capacity of that landscape to absorb a particular development type without undue negative effects on its character and qualities. This can help decision makers to set objectives concerning the amount of acceptable change in a particular area. It must be borne in mind however that, as stated in the guidance, '*when dealing with landscapes and change it is not easy to simply quantify exactly how much development a specific area can accommodate. Many important factors come into play, including professional judgement – informed by site visits*'

Landscape sensitivity assessment can be undertaken at any scale however for the purposes of this study, it has been undertaken at the level of County Landscape Character Type (LCT) using the 'Leitrim Landscape Character Assessment Review'.

2.1.2 Criteria – assessment of sensitivity of each LCT to commercial forestry

The following **criteria** have been developed for the landscape sensitivity assessment to commercial forestry. Each of the 17 LCTs in County Leitrim were evaluated with reference to the criteria below which include both natural, cultural and perceptual as well as valued attributes associated with each LCT as follows.

2.1.2.1 Natural Criteria

- Landform – Landscapes with complex landforms such as that associated with steep scree mountain slopes or hills with a distinctive profile are usually more sensitive to commercial forestry than landscapes with a simple, smooth and flowing landform. An exception to this may be in areas of moorland plateau which, although featuring simple smooth flowing landforms, parts of these landscapes often overlook steep sided valleys and hence present as a distinctive skyline in County Leitrim;
- Landcover – Landscapes where the landcover comprises heather, moor and bog and where water bodies are present as distinctive features and commercial forestry is generally absent are likely to be more sensitive to the introduction of commercial forestry compared with farmed landscapes featuring woodland and some level of commercial forest cover. Where farmed landcover results in a distinct and small scale pattern such as that associated with old stone wall enclosure, these areas are likely to be more sensitive to commercial forestry than areas of farmland where field patterns are more fragmented.
- Size and scale – Landscapes which feature small scale field patterns or small scale landforms such as groups of hills that form a distinctive pattern may be more sensitive to commercial forestry especially of a size that might undermine these patterns as key characteristics in the landscape. By contrast, landscapes where field patterns and topography patterns are weak or absent may be less sensitive to commercial forestry.
- Landscape Context – The landscapes or LCTs that surround a particular landscape or LCT form the setting for that LCT and are relevant to its sensitivity to commercial forestry.

2.1.2.2 Cultural and Perceptual Criteria

- Perceptual Qualities – Landscapes which are perceived as highly tranquil and have a sense of wildness or remoteness are usually more sensitive to commercial forestry compared with busy active landscapes or landscapes with visible infrastructure or industrialised areas.
- Visual Characteristics – Landscapes which feature distinctive skylines, landmarks or focal points enjoyed in views by people will generally be more sensitive to commercial forestry than landscapes which do not feature important skylines and focal points visible from surrounding areas.

2.1.2.3 Landscape Value

- Presence of designations, including Areas of Outstanding Natural Beauty (AONB) and Areas of High Visual Amenity (AHVA) in County Leitrim and protected views and prospects are indicators of landscape value at county level in Leitrim. Such landscapes tend to be of higher sensitivity to commercial forestry whilst undesignated landscapes are usually of lower sensitivity.
- Landscapes with features of cultural interest and recreational assets such as promoted walking routes are valued landscape assets which are enjoyed by recreational visitors. Landscapes with these features are usually of higher sensitivity than landscapes which do not have these features. The setting of monuments, in particular where landscape is important to the understanding of that monument, would be highly sensitive to commercial forestry. The detailed examination of the monuments and settings is outside the scope of this study; and
- Landscapes which feature designated ecological assets which present as a distinctive landcover and are influential in the character of the landscape may be of higher sensitivity compared with undesignated areas. The ecological assessment of these European sites is outside the scope of this study but included in the mapped baseline to give context to their respective geographic locations within the various LCTs.

2.1.3 Sensitivity to commercial forestry

Each LCT is assigned a sensitivity ranking based on evaluation against the criteria referenced above. The ranking follows a 5 point scale ranging from very high to very low as described below. It is important to note that the sensitivity ranking is applied to each LCT on a case by case basis using professional judgement with the ranking below as a guide.

Very High – A landscape of exceptional landscape quality and scenic quality and for which, the natural, cultural and perceptual characteristics would be of very high sensitivity to commercial forestry. Landscape designation (AONB and or AHVA) applies to all or the majority of the area. Key elements and features within the landscape are the subject of many protected views and are well known to the public and are promoted as heritage attractions.

High – A landscape that is of high landscape quality and scenic quality where landscape detractors are generally absent. A landscape, the natural, cultural and perceptual characteristics of which would be of high sensitivity to commercial forestry. Landscape designation (AONB and or AHVA) applies to a large part of the area. Key elements and features within the landscape are the subject of protected views and are well known to the public and are promoted as heritage attractions.

Medium - A landscape that is of medium landscape quality and scenic quality where there are few landscape detractors. A landscape, the natural, cultural and perceptual characteristics of which would be of medium sensitivity to commercial forestry. Landscape designation (AONB and or AHVA) apply to part of the area. Protected views within the landscape are often focused on adjacent highly sensitive landscapes. The area is known and enjoyed by the public.

Low – A landscape which has limited or no distinctive characteristics and is of medium landscape quality and scenic quality. Landscape detractors are present. A landscape, the natural, cultural and perceptual characteristics of which would be of low sensitivity to commercial forestry. The landscape is generally undesignated. Protected views are generally absent and the features within are not the subject of protected views. The area is generally not promoted for visitors and recreation.

Very Low – Landscapes which have no particular scenic qualities or are in poor condition or altered by presence of intrusive manmade structures. No landscape designations or protected views are present.

2.2 Reporting

Section 3 presents the baseline and sensitivity assessment. For each LCT, the baseline landscape character description and relevant baseline data is presented including designated landscapes, protected views and prospects, heritage attractions and walks and trails. The baseline also includes data on existing commercial forestry such as the Corine landcover data (2018) relating to coniferous forest which is broadly indicative of the extent of commercial forestry in 2018. In addition, forest data from the Department of Agriculture, Food and the Marine (DAFM) dated 2020 is presented and this shows areas of commercial forestry in private ownership. Both mapped datasets have informed an understanding of the extent of existing commercial coniferous forestry in County Leitrim

This is followed by the sensitivity assessment, undertaken with reference to the criteria outlined in the methodology above. Each LCT is then assigned a sensitivity ranking using the 5 point score outlined above. The findings of the sensitivity assessment are used to inform the capacity of each LCT to accommodate commercial forestry which is then presented along with design guidance.

3 LANDSCAPE SENSITIVITY TO COMMERCIAL FORESTRY

This section of the report presents the baseline and landscape sensitivity assessment for each of the 17 LCTs in County Leitrim. The baseline is presented, informed by data relating to landscape character, proposed landscape designations and proposed protected views and prospects for County Leitrim, prepared in 2020 and 2021 by RPS as follows:

- Draft written descriptions for each LCT from the report entitled 'Leitrim Landscape Character Assessment Review';
- Draft written data on landscape designations, including proposed AONBs and proposed AHVAs from the report entitled 'Leitrim Review of Landscape Designations'; and
- Draft written data on proposed protected views and prospects from the report entitled 'Leitrim Review of Views and Prospects'.

The baseline also considered mapped data pertaining to relevant Corine landcover categories and commercial forestry as follows:

- Corine landcover data (2018), specifically the categories that cover broadleaf forest (311), coniferous forest (312), mixed forest (313) and transition woodland / scrub (324); and
- Data on commercial forestry plantations, dated 2020, obtained through Leitrim County Council from the DAFM.

In addition, data on recreational walking routes ¹ and heritage attractions ² in County Leitrim sourced in September 2021 from the Leitrim tourism website was considered.

The baseline is supported by a series of baseline maps as follows:

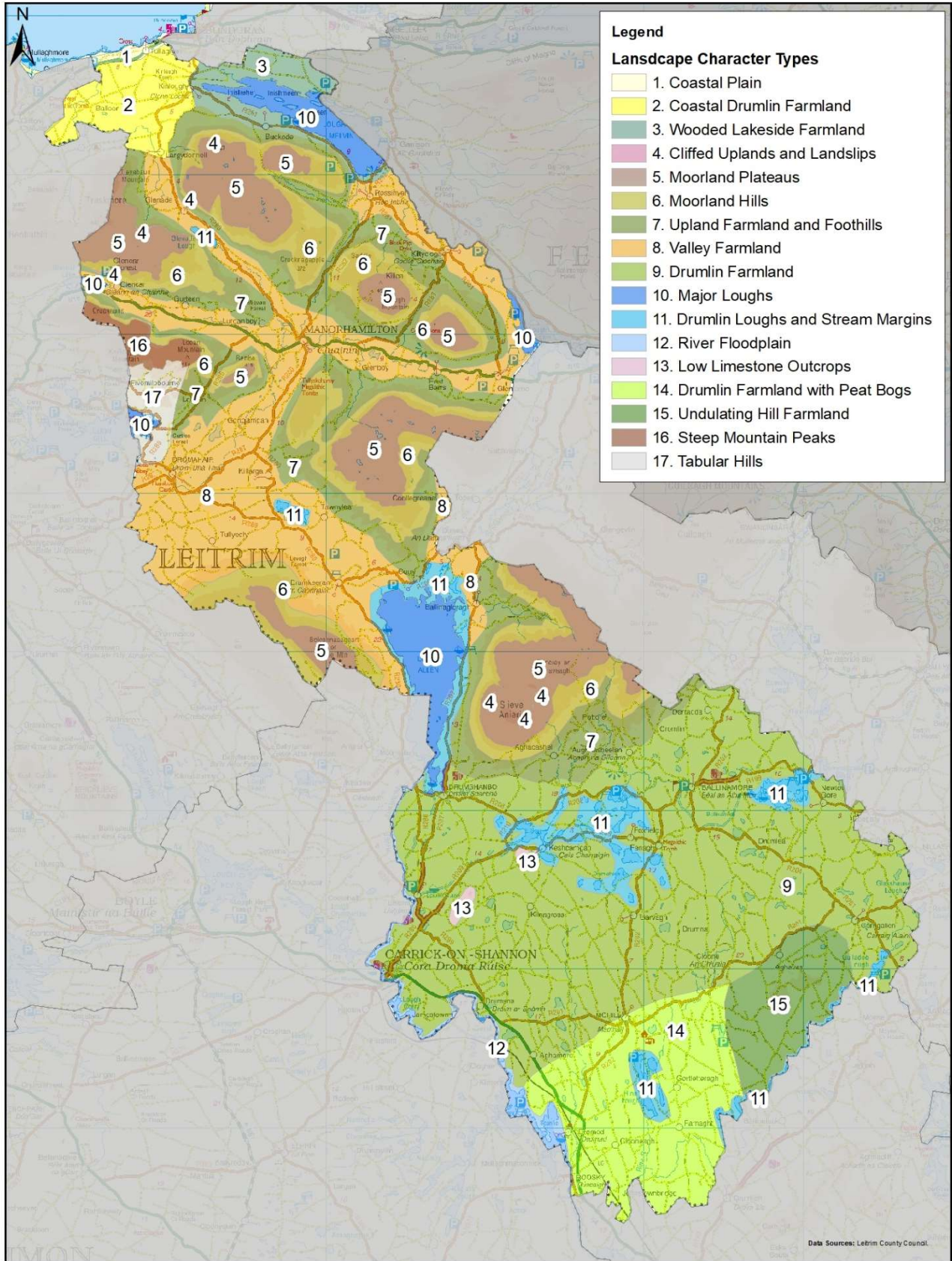
- Figure 3.1 - Landscape Character Types;
- Figure 3.2 – Landscape Character Types and Proposed Landscape Designations;
- Figure 3.3 - Landscape Character Types and Proposed Views and Prospects; and
- Figure 3.4 - Landscape Character Types and walking routes and heritage attractions.

Appendix A of this report contains Figure 3.5 Designated Nature Sites for reference only as this aspect is outside the scope of the landscape capacity study.

The assessment of sensitivity of each LCT to commercial forestry is then presented and a score or ranking in the range from very high, high, medium, low and very low is applied. The sensitivity assessment is the basis for further detail presented on the capacity of a given LCT to accommodate commercial forestry along with design guidance.

¹ <https://leitrimtourism.com/things-to-do/walks-and-trails/>

² <https://leitrimtourism.com/things-to-do/heritage/>



<p>Title</p> <p style="text-align: center;">Figure 3.1</p> <p style="text-align: center;">Landscape Character Types</p>	<p>Project</p> <p>Leitrím Landscape Capacity Study for Commercial Forestry</p>	<p>West Pier Business Campus, Dun Laoghaire, Co. Dublin, Ireland</p> <p>Tel: +353 (0) 1 488 2900 Email: ireland@rpsgroup.com Web Page: rpsgroup.com/ireland</p>	<p>Issue Details</p> <table border="1"> <tr> <td>Drawn By: NR</td> <td>Project No. IE000116</td> </tr> <tr> <td>Checked By: EOC</td> <td>Date: 04/11/2021</td> </tr> <tr> <td>Approved By: EOC</td> <td>File Ref:</td> </tr> <tr> <td>Scale: 1:310,000 @ A4</td> <td>ISSUE FOR COMMENT ONLY - ADDRESS</td> </tr> </table>	Drawn By: NR	Project No. IE000116	Checked By: EOC	Date: 04/11/2021	Approved By: EOC	File Ref:	Scale: 1:310,000 @ A4	ISSUE FOR COMMENT ONLY - ADDRESS
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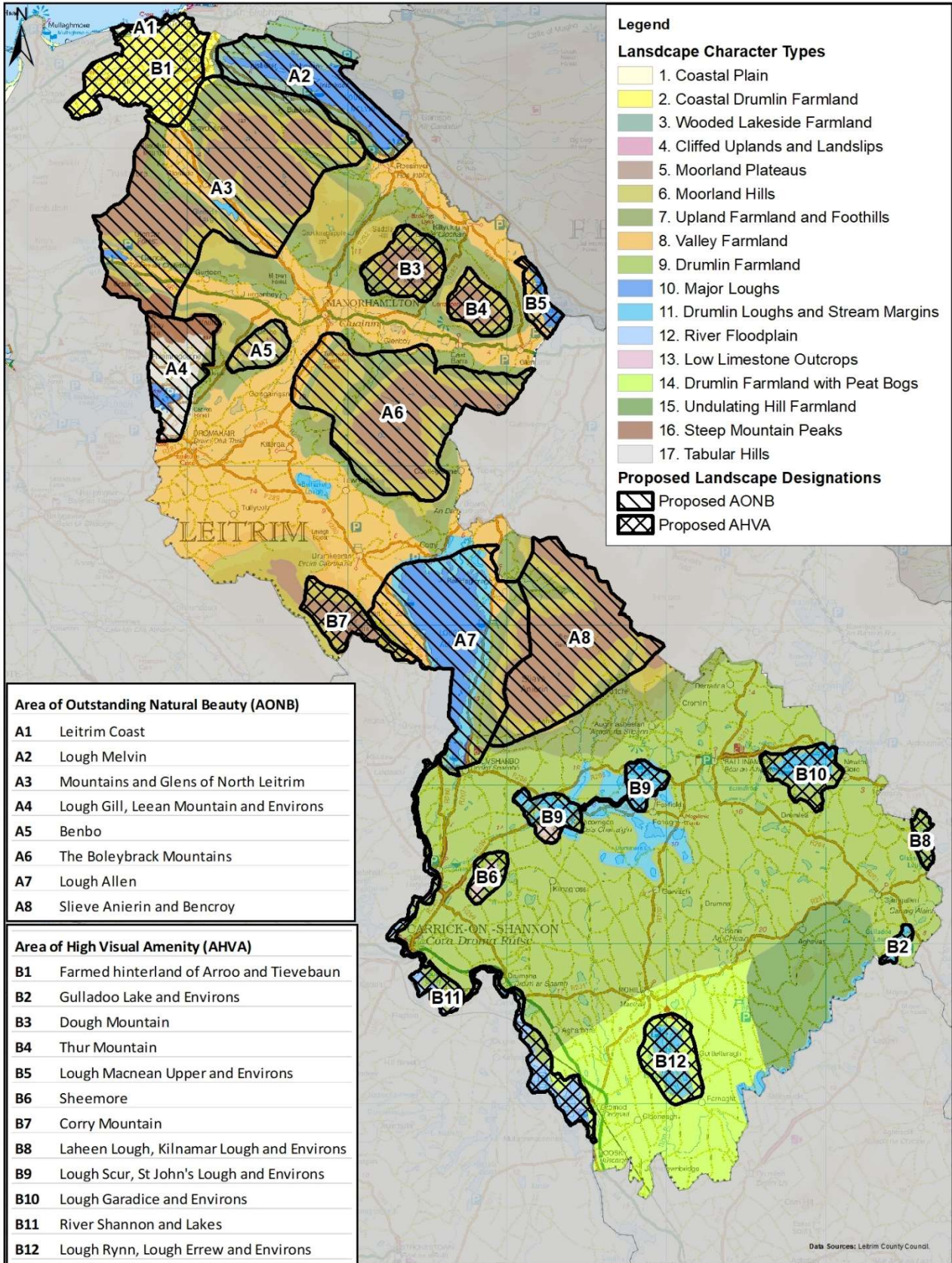


Figure 3.2
Landscape Character Types and Proposed Landscape Designations

Project
 Leitrim Landscape Capacity Study for Commercial Forestry

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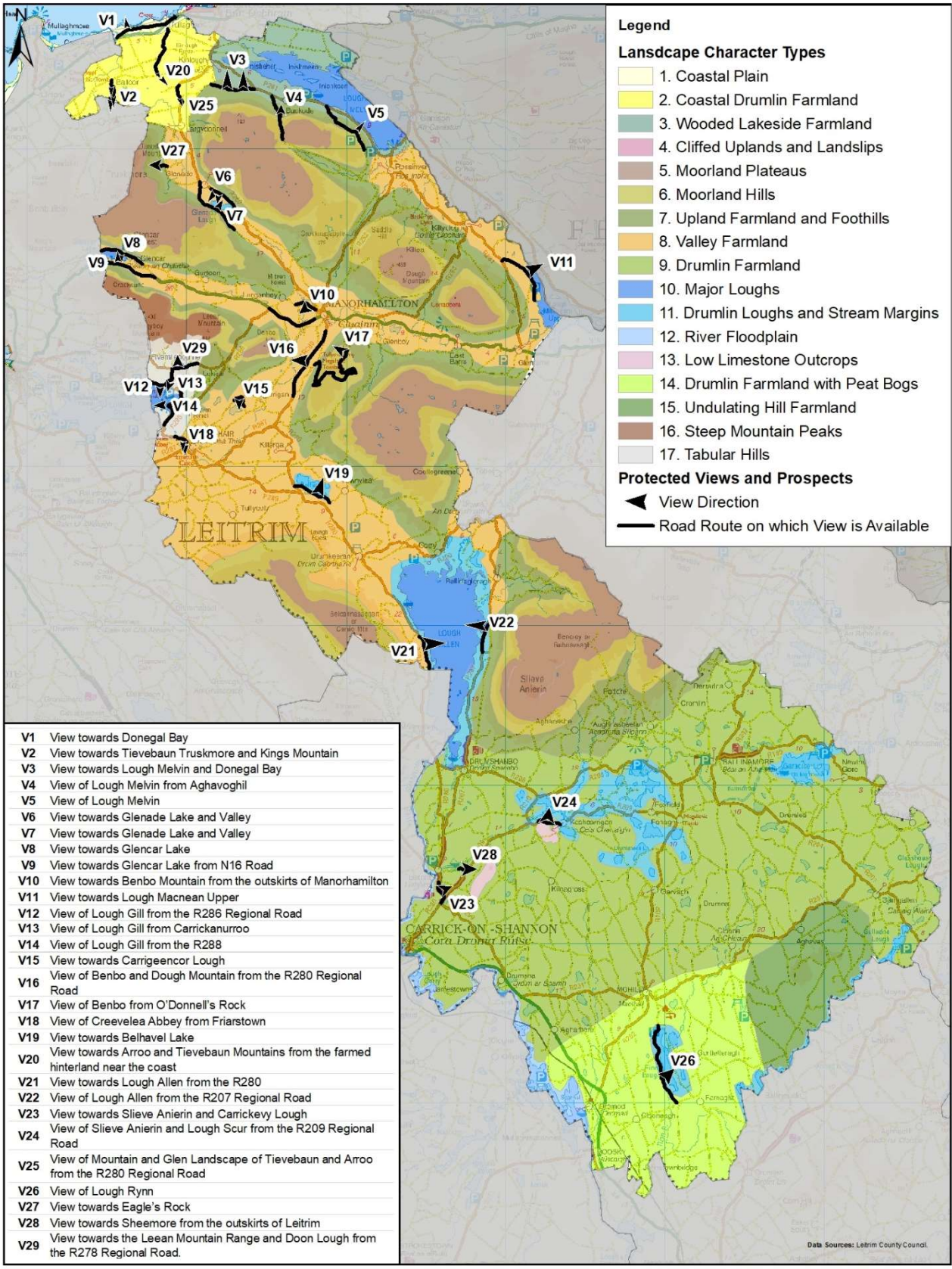
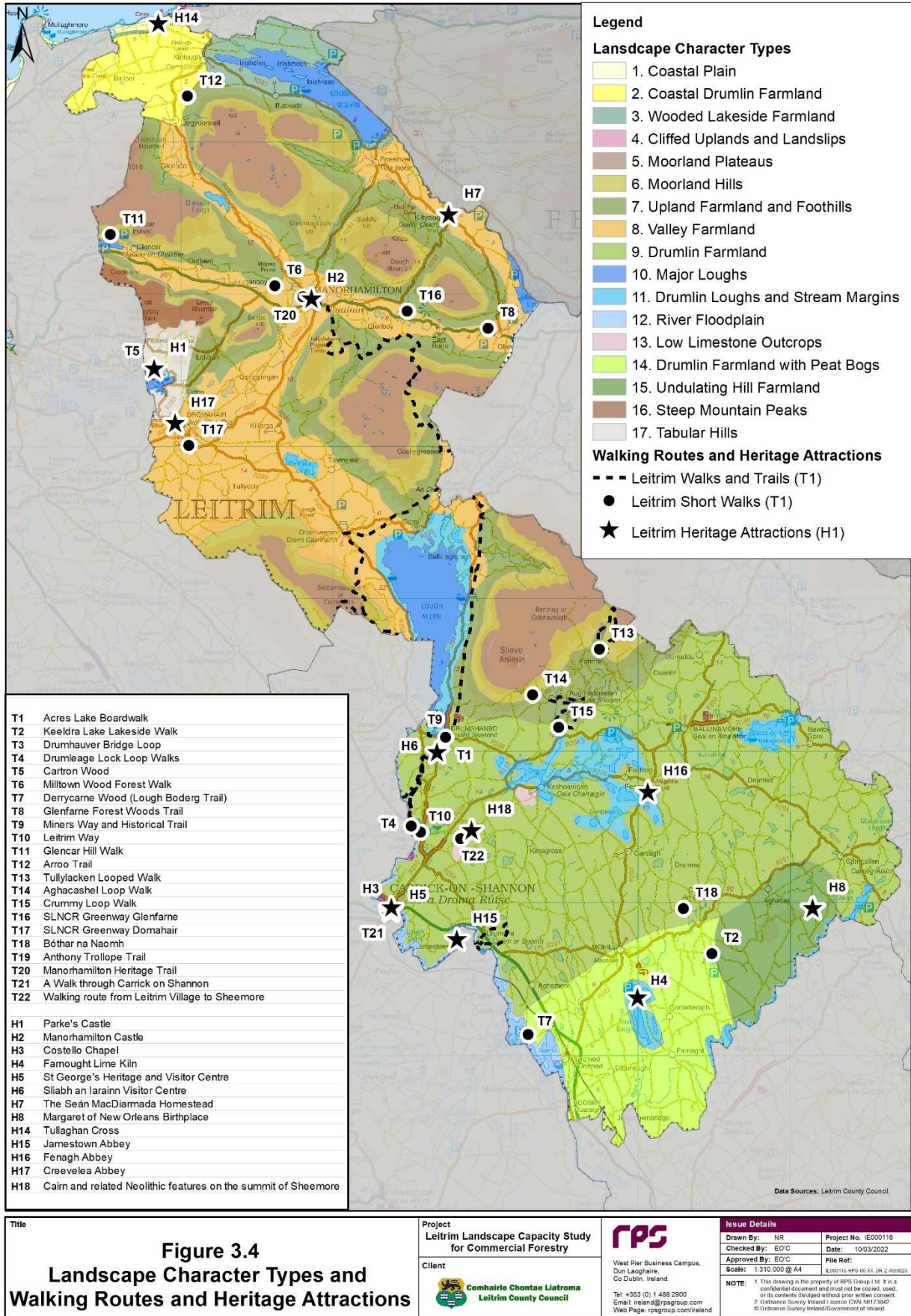


Figure 3.3
Landscape Character Types and Views and Prospects

<p>Project Leitrim Landscape Capacity Study for Commercial Forestry</p> <p>Client Leitrim County Council</p>	<p>rps</p> <p>West Pier Business Campus, Dun Laoghaire, Co Dublin, Ireland.</p> <p>Tel: +353 (0) 1 488 2900 Email: ireland@rpsgroup.com Web Page: rpsgroup.com/ireland</p>	<p>Issue Details</p>	
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3.1 LCT 1. Coastal Plain

3.1.1 Baseline

LCT 1 Coastal Plain is located along the coastline in North Leitrim.

3.1.1.1 LCT 1. Coastal Plain – Landscape Character Description

The ‘Leitrim Landscape Character Assessment Review’ described LCT 1 Coastal Plain as follows.

‘This LCT comprises a narrow strip of land located on the coastline which marks the County boundary to the north. It comprises marginal farmland some of which is established on grassy coastal sand dunes overlooking Donegal Bay.

The coastal edge follows a sinuous line and is comprised of low sandy, rocky cliffs. An extensive crescent shaped beach area extends from the eastern end near Tullaghan. A further stretch of coastline at the western end features beach extending from the mouth of the Duff River to the east. The outlook over the sea is relatively undeveloped in terms of visible marine activity and infrastructure. Views to sea are open and expansive with large skies and the distant views of mountain skylines associated with Derryveagh and Blue Stack Mountains in Donegal

At a local level, the views to sea are framed by the headlands associated with Mullaghmore Head to the west in County Sligo and Kildoney Point to the east in Donegal. In this regard, this particular seascape, as it occurs within Leitrim, could be considered, to sit within the broader seascape character type no. 8 Large Bay as defined in the seascape character assessment undertaken for the whole of Ireland, published in the SEA of the Offshore Renewable Energy Development Plan . No. 8 Large Bay extends around Donegal Bay, the Leitrim Coastline and part of the Sligo Coastline. The coastal plain LCT in Leitrim lies adjacent to Seascape Character Unit 19, Donegal Bay in the County Donegal Seascape Character Assessment which extends from St John’s Point to Bundoran.

The landward component comprises undulating rough pastoral farmland with a small-scale field pattern often comprised of long narrow rectangular fields aligned at right angles to the coast. Generations of farmers removing boulders from the fields has resulted in a dry stone wall landscape which is visually open due to the scarcity of trees, hedgerows and woodland. Woody vegetation comprises mainly short hedgerows and windblown hawthorns. Individual dwellings are dispersed throughout this landscape. Tranquillity is high except in the vicinity of Tullaghan where the noise of the traffic on the N15 can be faintly heard. The N15 runs through this landscape carrying traffic constantly. It provides access to the area for recreational visitors in the locality and those touring the Wild Atlantic Way.’

3.1.1.2 LCT 1. Coastal Plain – Designated landscapes, views and prospects

The ‘Leitrim Review of Landscape Designations’ report reflects the value of particular landscapes in County Leitrim and are recognised as such in the draft County Development Plan. The entire LCT is designated as tabulated below.

Table 3-1: LCT 1. Designated Landscapes

MAP ID	Designated Landscapes
A1	Leitrim Coast AONB – applies to the coastline within this LCT.
B1	Farmed hinterland of Arroo and Tievebaun AHVA – applies to the inland part of this LCT

The ‘Leitrim Review of Views and Prospects’ report is also recognised in the draft County Development Plan. Those that occur within this LCT are tabulated below.

Table 3-2: LCT 1. Views and Prospects

MAP ID	Views and Prospects
V1	View towards Donegal Bay

3.1.1.3 LCT 1. Coastal Plain – Promoted walking routes and heritage attractions

Other indicators of landscape value are the promoted walking routes and heritage attractions where landscape is an important part of the experience. These are tabulated below.

Table 3-3: LCT 1. Coastal Plain - Walking Routes and Heritage Attractions

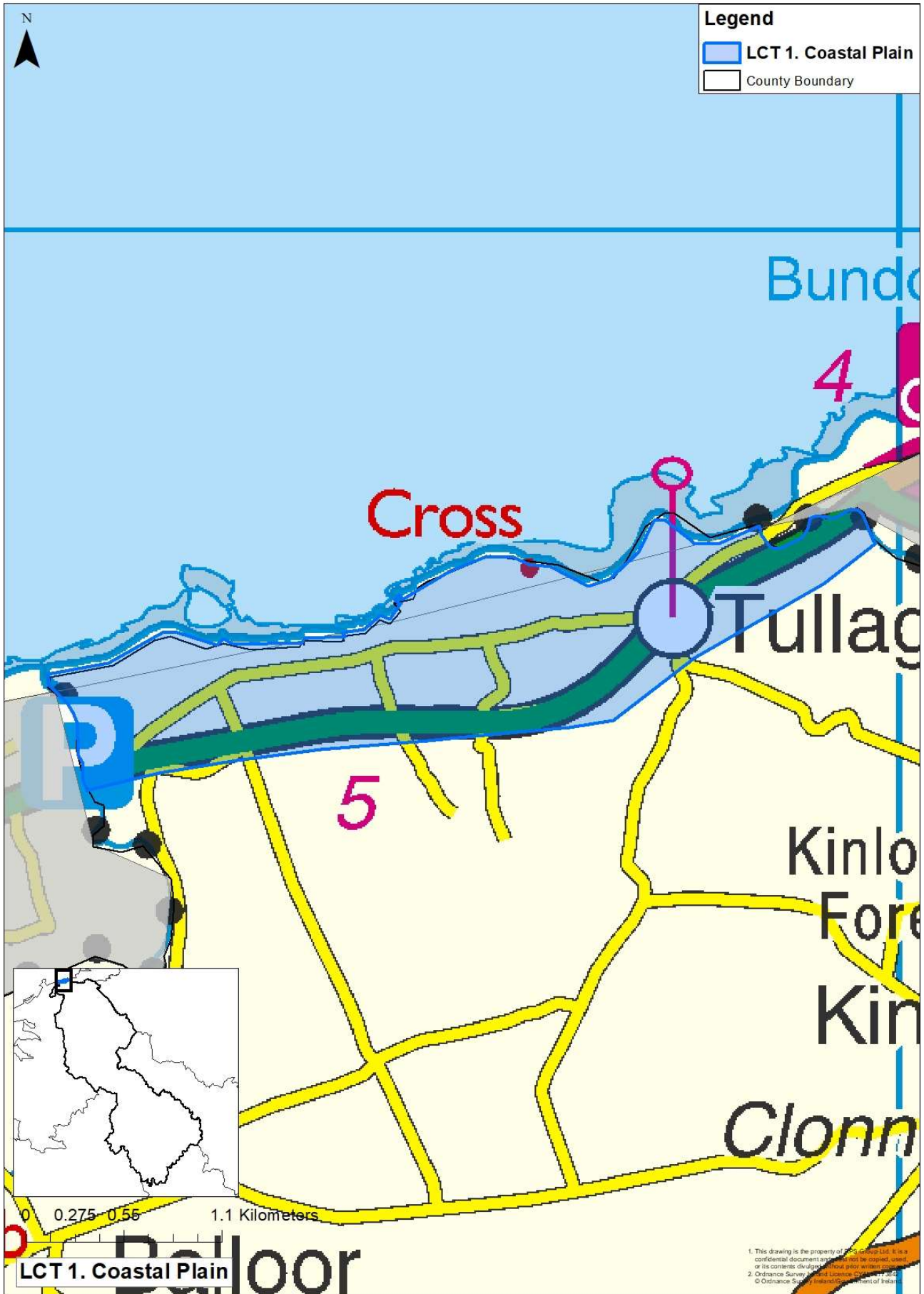
MAP ID	Walking Route / Heritage Attraction
-	The coast road is promoted as part of The Wild Atlantic Way. This is also the route for the North West Cycle Trail.
H14	Tullaghan Cross – located near the settlement of Tullaghan.

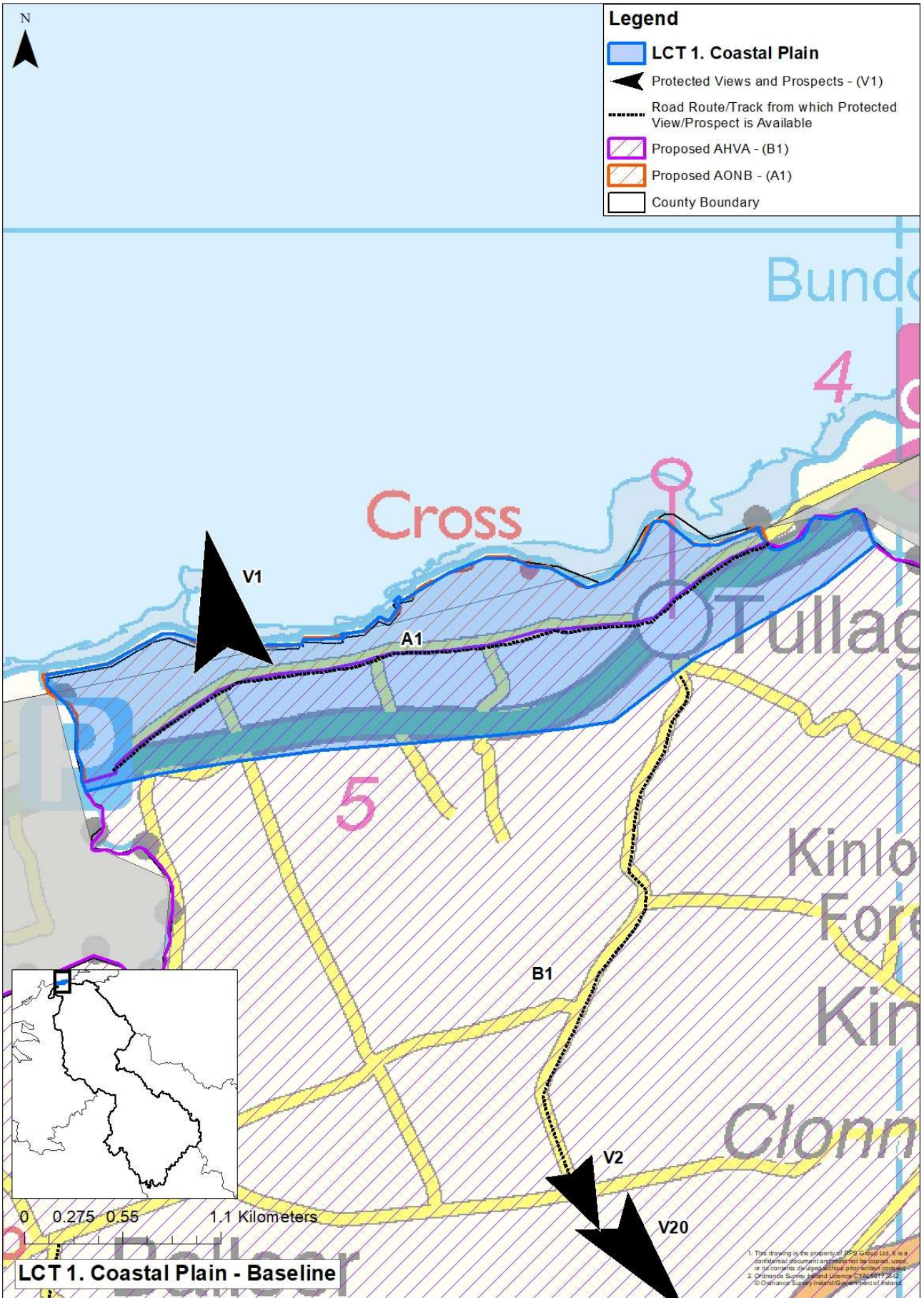
3.1.1.4 LCT 1. Coastal Plain – Existing commercial forestry

The Corine landcover data along with the available data from DAFM indicate the absence of commercial forestry in this LCT.

3.1.1.5 Baseline Maps

The baseline for this LCT is illustrated in the following three map figures. A detailed location map is presented and this is followed by a baseline map indicating the location of proposed landscape designations, protected views and prospects. Finally, a map which presents the baseline woody vegetation cover and commercial forest cover is also presented.







3.1.2 LCT 1. Coastal Plain – Assessment of Sensitivity to Commercial Forestry

The assessment of the sensitivity of LCT 1 Coastal Plain to commercial forestry is presented below and takes account of natural criteria (including landform, landcover, scale and landscape context), visual and perceptual criteria and indicators of landscape value such as presence of designations, protected views and promoted walking routes and heritage attractions. The absence of commercial forestry plantations is also considered in the sensitivity assessment.

3.1.2.1 LCT 1. Coastal Plain – Landform, landcover and scale

Landform at the coastal edge with its distinctive and complex cliff edges and beaches would be highly sensitive to commercial forestry which could obscure or mask these features and the visual relationship with the sea including the distinctive headlands of Mullaghmore and Bundoran in County Donegal.



Complex undulating landforms along the coastline are highly sensitive to commercial forestry.

Areas where strong field patterns are present and strongly defined by hedgerows and stone walls would be highly sensitive to commercial forestry which could erode or undermine these defining patterns of this landscape. This is especially true of the pattern of long rectangular fields close to the coastline.



Small scale field patterns defined by traditional stone wall boundaries are highly sensitive to commercial forestry.

This LCT is open due to the relative scarcity of wooded landcover, apart from field hedgerows. Commercial forestry does not feature within this LCT and the introduction of new commercial forestry plantations in the future would be at variance with the key characteristics of this landscape.

3.1.2.2 LCT 1. Coastal Plain – Landscape context

This landscape forms an important foreground in the outlook towards Donegal Bay and the skyline of the Bluestack Mountains beyond. This aspect of the landscape would be highly sensitive to commercial forestry which would obstruct this visual relationship with the sea and mountain skylines beyond. The landscape further inland is also sensitive due to its outlook towards, and visual relationship with the mountains further south.



Outlook towards the coast and Donegal Bay.



Outlook towards mountains further south.

3.1.2.3 LCT 1. Coastal Plain – Visual and perceptual criteria

Most of this landscape is perceived as having a sense of remoteness and wildness with high tranquillity levels except at Tullaghan. There are limited detracting built elements apart from the N15 road and busy traffic. Views of the coast, Donegal Bay and Mountain skyline are highly scenic. All of these factors result in a very high sensitivity to commercial forestry which could reduce the sense of remoteness, tranquillity and elemental character of this LCT and also obstruct highly scenic views of the coastline, headlands and mountains further afield.

3.1.2.4 LCT 1. Coastal Plain – Landscape Value

The entire LCT is designated, in part as AONB and in part, as AHVA. The designation reflects the outstanding natural beauty associated with this LCT. Protected views within are focussed on the coast and Donegal Bay. The area is promoted as part of the Wild Atlantic Way. LCT 1 Coastal Plain is therefore a highly valued landscape, the scenic quality and recreational value of which would be undermined by commercial forestry.

3.1.2.5 LCT 1. Coastal Plain – Sensitivity ranking

This LCT is considered to be of **very high** sensitivity to commercial forestry. The entire LCT occurs within a proposed AONB and a proposed AHVA designation and this is reflective of the landscape and scenic quality therein. The natural and cultural and perceptual characteristics of this landscape along with its recreational and scenic value as outlined above are such that this area would be highly sensitive to commercial forestry. The area is considered to have no capacity for further commercial forestry plantations.

3.2 LCT 2. Coastal Drumlin Farmland

3.2.1 Baseline

LCT 2 Coastal Drumlin Farmland occupies a large area of marginal farmland near the coast in the north of County Leitrim.

3.2.1.1 LCT 2. Coastal Drumlin Farmland – Landscape Character Description

The ‘Leitrim Landscape Character Assessment Review’ described LCT 2 Coastal Drumlin Farmland as follows.

‘This LCT comprises a mosaic of cutover bog and farmland located between the coastal plain and the upland landscapes of Tievebaun and Arroo. The topography comprises gently rolling drumlin hills. The area features large tracts of bog and marsh interspersed with rough pasture and abundant areas of woody scrub vegetation including Willow and Birch. Areas of cutover bog have an abundance of Rhododendron (Rhododendron ponticum) infestation. Isolated patches of plantation coniferous forest are dispersed throughout. Pastoral farmland is present as a small to medium scale field pattern defined by hedgerows or post and wire fences. Some signs of dereliction are apparent in terms of dwellings, farm buildings and roads in poor condition. The landscape is relatively flat and visually open where wooded vegetation is absent affording views of big skies. The more open areas of this landscape are overlooked from the south by Tievebaun Mountain and in the east, by Arroo Mountain.’

3.2.1.2 LCT 2. Coastal Drumlin Farmland – Designated landscapes, views and prospects

The ‘Leitrim Review of Landscape Designations’ report reflects the value of particular landscapes in County Leitrim and are recognised as such in the draft County Development Plan. Almost the entire area is designated as tabulated below.

Table 3-4: LCT 2. Designated Landscapes

MAP ID	Designated Landscapes
B1	Farmed hinterland of Arroo and Tievebaun AHVA – applies to almost all of this LCT.

The ‘Leitrim Review of Views and Prospects’ report is also recognised in the draft County Development Plan. Those that occur within this LCT are tabulated below.

Table 3-5: LCT 2. Views and Prospects

MAP ID	Views and Prospects
V2	View towards Tievebaun Truskmore and Kings Mountain
V20	View towards Arroo and Tievebaun Mountains from the farmed hinterland near the coast
V25	View of Mountain and Glen Landscape of Tievebaun and Arroo from the R280 Regional Road

3.2.1.3 LCT 2. Coastal Drumlin Farmland – Promoted walking routes and heritage attractions

Other indicators of landscape value are the promoted walking routes and heritage attractions where landscape is an important part of the experience. These are tabulated below.

Table 3-6: LCT 2. Walking Routes and Heritage Attractions

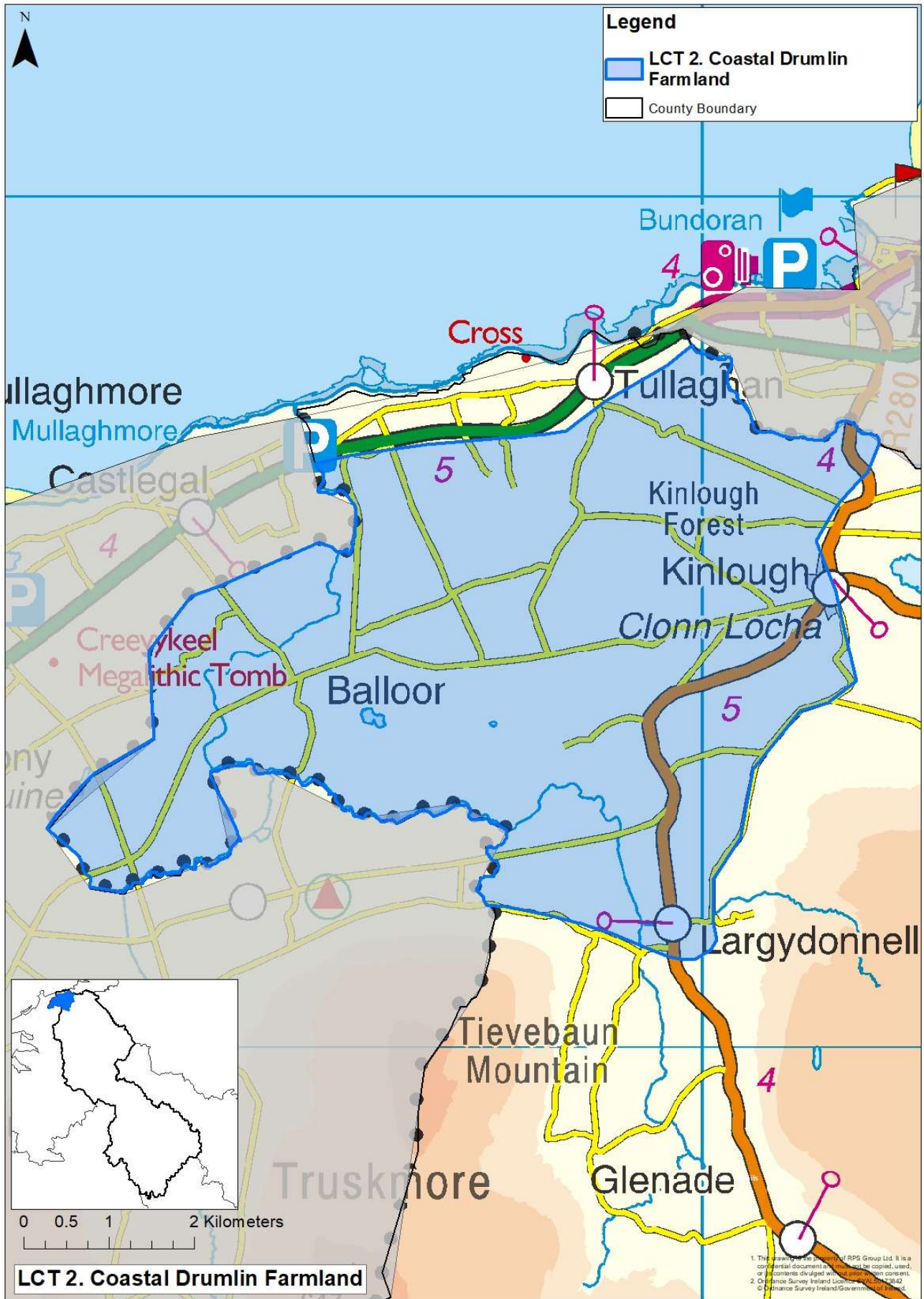
MAP ID	Walking Route / Heritage Attraction
T12	Arroo Trail

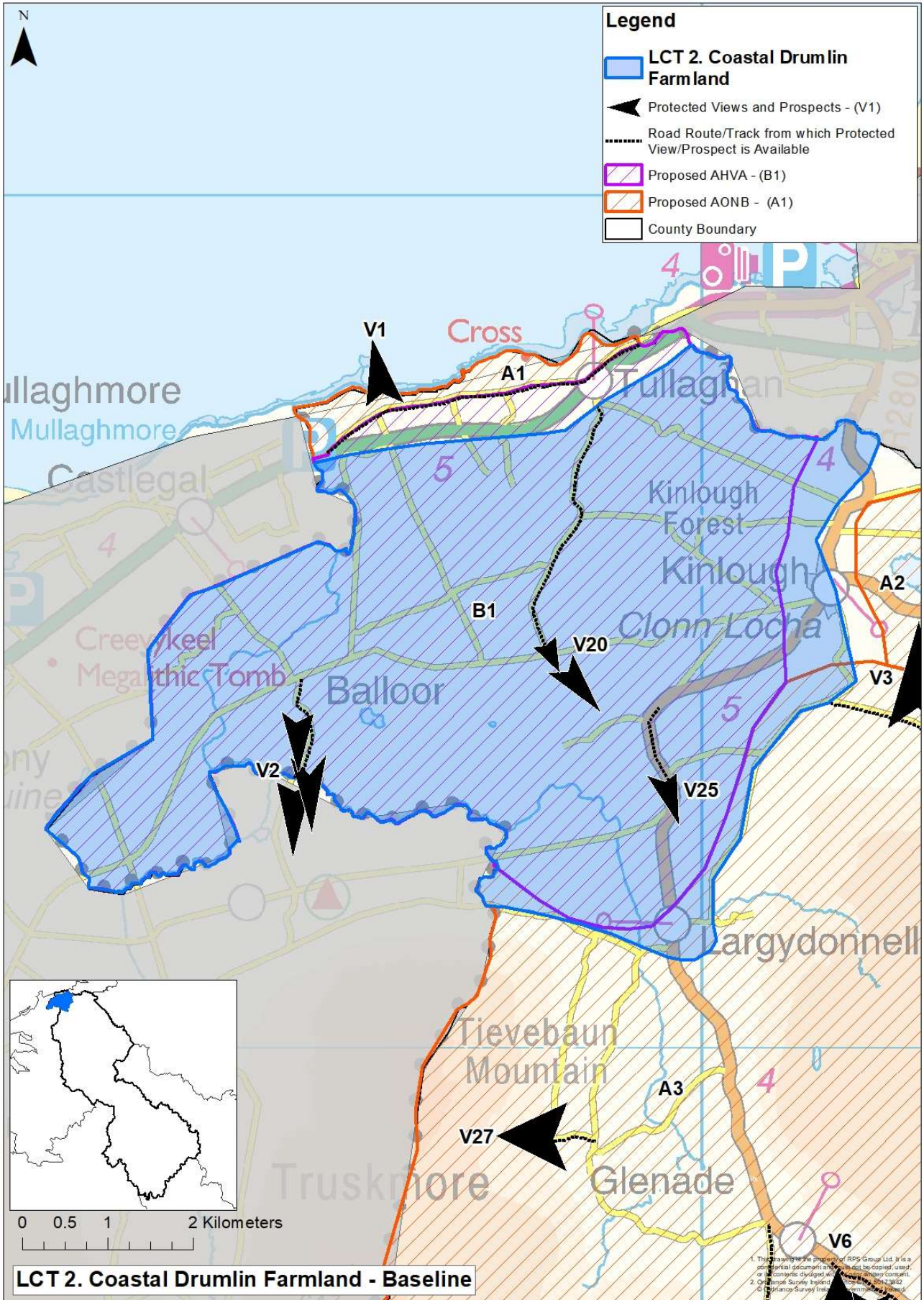
3.2.1.4 LCT 2. Coastal Drumlin Farmland – Existing commercial forestry

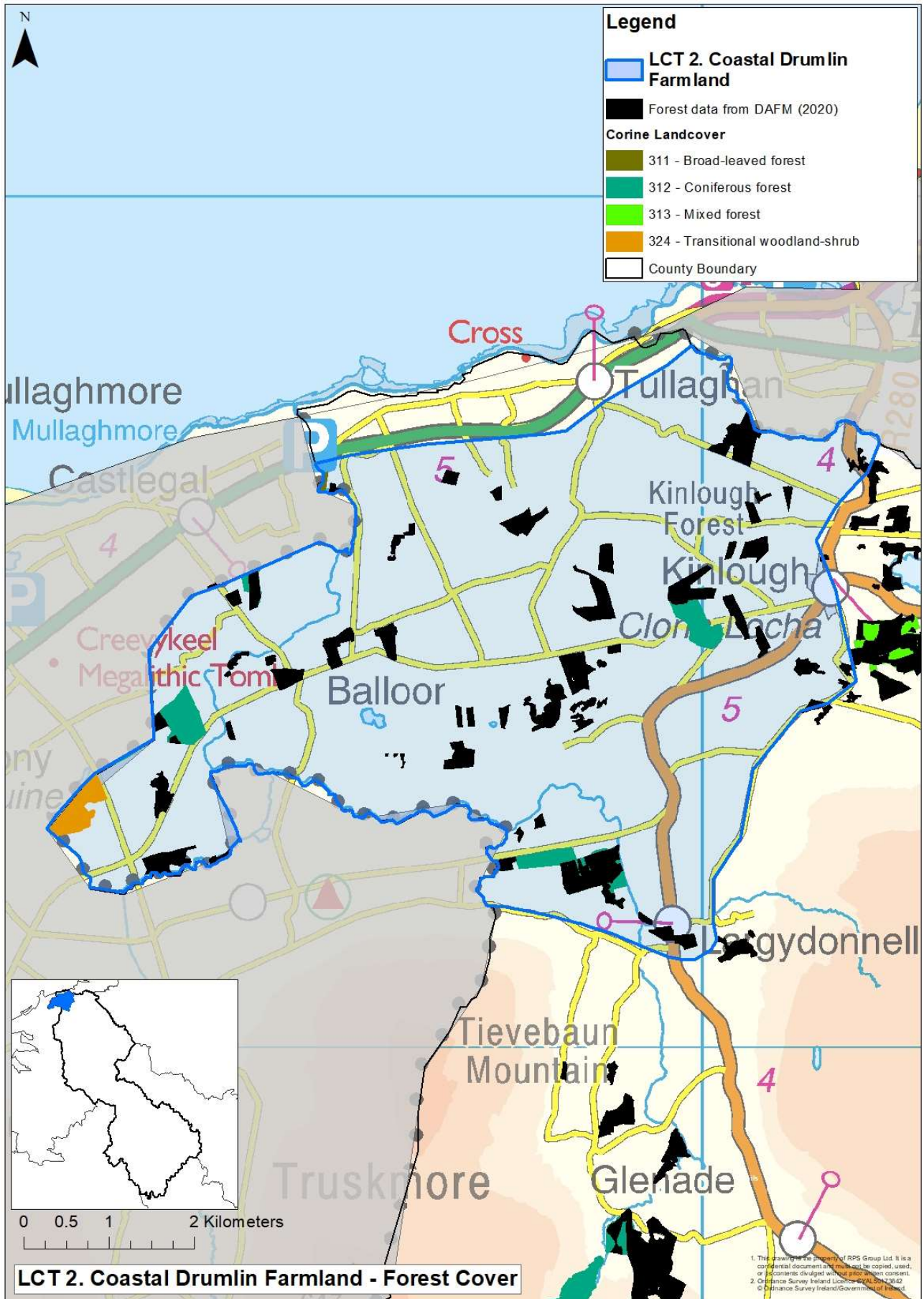
The Corine landcover data along with the available data from DAFM indicate the presence of some commercial forestry plantations of varying size dispersed throughout this LCT. These commercial forestry plantations are not generally a dominant landcover type in the landscape.

3.2.1.5 Baseline Maps

The baseline for this LCT is illustrated in the following three map figures. A detailed location map is presented and this is followed by a baseline map indicating the location of proposed landscape designations, protected views and prospects. Finally, a map which presents the baseline woody vegetation cover and commercial forest cover is also presented.







3.2.2 LCT 2. Coastal Drumlin Farmland – Assessment of Sensitivity to Commercial Forestry

The assessment of the sensitivity of LCT 2 Coastal Drumlin Farmland to commercial forestry is presented below and takes account of natural criteria (including landform, landcover, scale and landscape context), visual and perceptual criteria and indicators of landscape value such as presence of designations, protected views and promoted walking routes and heritage attractions. The presence and extent of existing commercial forestry plantations is also considered in the sensitivity assessment.

3.2.2.1 LCT 2. Coastal Drumlin Farmland – Landform, landcover and scale

The landform is relatively simple, featuring gently rolling drumlin hills. Areas of this landscape which feature a simple landform and scarcity of field pattern as a scale reference would be less sensitive to commercial forestry. In some areas where patches of woody vegetation and existing commercial forests are present, some commercial forestry of an appropriate small scale may be discreetly accommodated.



Areas featuring transitional woodland and scrub may have capacity to absorb commercial forest plantations of appropriate scale.

Much of the LCT features large tracts of bog and marsh which are visually open. These areas would be sensitive to commercial forestry which would contrast and conflict with their open character as well as displacing the sensitive bog landcover.

The Corine landcover data along with the available data from DAFM indicate the presence of commercial forestry as randomly dispersed plantations of small scale with occasional larger tracts throughout. These plantations are apparent in the landscape but are not a dominant element and do not undermine the underlying landscape character. The LCT would be sensitive to further commercial forestry planting which, combined with that existing, may undermine the key characteristics of this landscape.

3.2.2.2 LCT 2. Coastal Drumlin Farmland – Landscape context

This LCT forms an important setting to the sensitive mountain landscape of Arroo and Tievebaun Mountains further south. This LCT overall would be sensitive to commercial forestry because of its important role as setting or foreground to these mountains. Commercial forestry could obstruct the visual relationship to the mountain landscape further south.



Mountain Skyline of Arroo near the settlement of Kinlough.



Tievebaun and Benwisikin – a complex and distinctive skyline viewed from remote farmland in the townland of Uragh.



The Arroo Mountain complex – a distinctive skyline viewed from remote farmland near the coast in Tawnytallan.

3.2.2.3 LCT 2. Coastal Drumlin Farmland – Visual and perceptual criteria

This landscape is perceived as having a sense of remoteness and wildness due to the large expanses of bog and wet grassland and the scarcity of detracting built elements. As a result, it is highly sensitive to commercial forestry which would undermine the remote and rural wilderness like character.

The landscape is visually open and has a strong visual relationship with the mountains further south. Scenic views could be obstructed by the introduction of commercial forestry.

3.2.2.4 LCT 2. Coastal Drumlin Farmland – Landscape Value

Almost the entire landscape is designated as AHVA apart from a small area in the east near Kinlough. This reflects the scenic quality and value of this landscape. Protected views within are focused on the distinctive and highly scenic mountain skylines.

3.2.2.5 LCT 2. Coastal Drumlin Farmland – Sensitivity ranking

This LCT is considered to be of **high** sensitivity to commercial forestry. Almost the entire area is designated. It is an open landscape with remote and wilderness like qualities which, combined with its visual relationship with the mountains further south would be highly sensitive to further commercial forestry planting.

3.3 LCT 3. Wooded Lakeside Farmland

3.3.1 Baseline

LCT 3 Wooded Lakeside Farmland occupies a large area of farmland around Lough Melvin in the north east of County Leitrim.

3.3.1.1 LCT 3. Wooded Lakeside Farmland – Landscape Character Description

The ‘Leitrim Landscape Character Assessment Review’ described LCT 3 Wooded Lakeside Farmland as follows.

‘A gently undulating drumlin farmed landscape surrounds Lough Melvin. The farmland comprises mostly pasture with a small to medium scale field pattern usually defined by mature hedgerows. Tracts of deciduous woodland are dispersed throughout along with occasional large tracts of commercial forestry. The deciduous woodland is abundant and usually occurs as long linear tracts interspersed with farmland. Few roads penetrate this landscape and these tend to be straight and narrow, lined with hedgerows or low grass banks and in some cases, mature woodland or commercial forest. The extent of the woody vegetation cover is such that the landscape is quite visually enclosed in many places. In areas which are more open, where woodland cover is absent, views are afforded over Lough Melvin. Distant views are available to the skyline of Arroo Mountain.’

3.3.1.2 LCT 3. Wooded Lakeside Farmland – Designated landscapes, views and prospects

The ‘Leitrim Review of Landscape Designations’ report reflects the value of particular landscapes in County Leitrim and are recognised as such in the draft County Development Plan. The majority of this LCT is designated as tabulated below.

Table 3-7: LCT 3. Designated Landscapes

MAP ID	Designated Landscapes
A2	Lough Melvin AONB – applies to most of this LCT
A3	Mountains and Glens of North Leitrim AONB - applies to a small part of this LCT south of Lough Melvin

The ‘Leitrim Review of Views and Prospects’ report is also recognised in the draft County Development Plan. Those of relevance are focused on Lough Melvin and are tabulated below.

Table 3-8: LCT 3. Views and Prospects

MAP ID	Views and Prospects
V3	View towards Lough Melvin and Donegal Bay
V4	View of Lough Melvin from Aghavoghil
V5	View of Lough Melvin

3.3.1.3 LCT 3. Wooded Lakeside Farmland – Promoted walking routes and heritage attractions

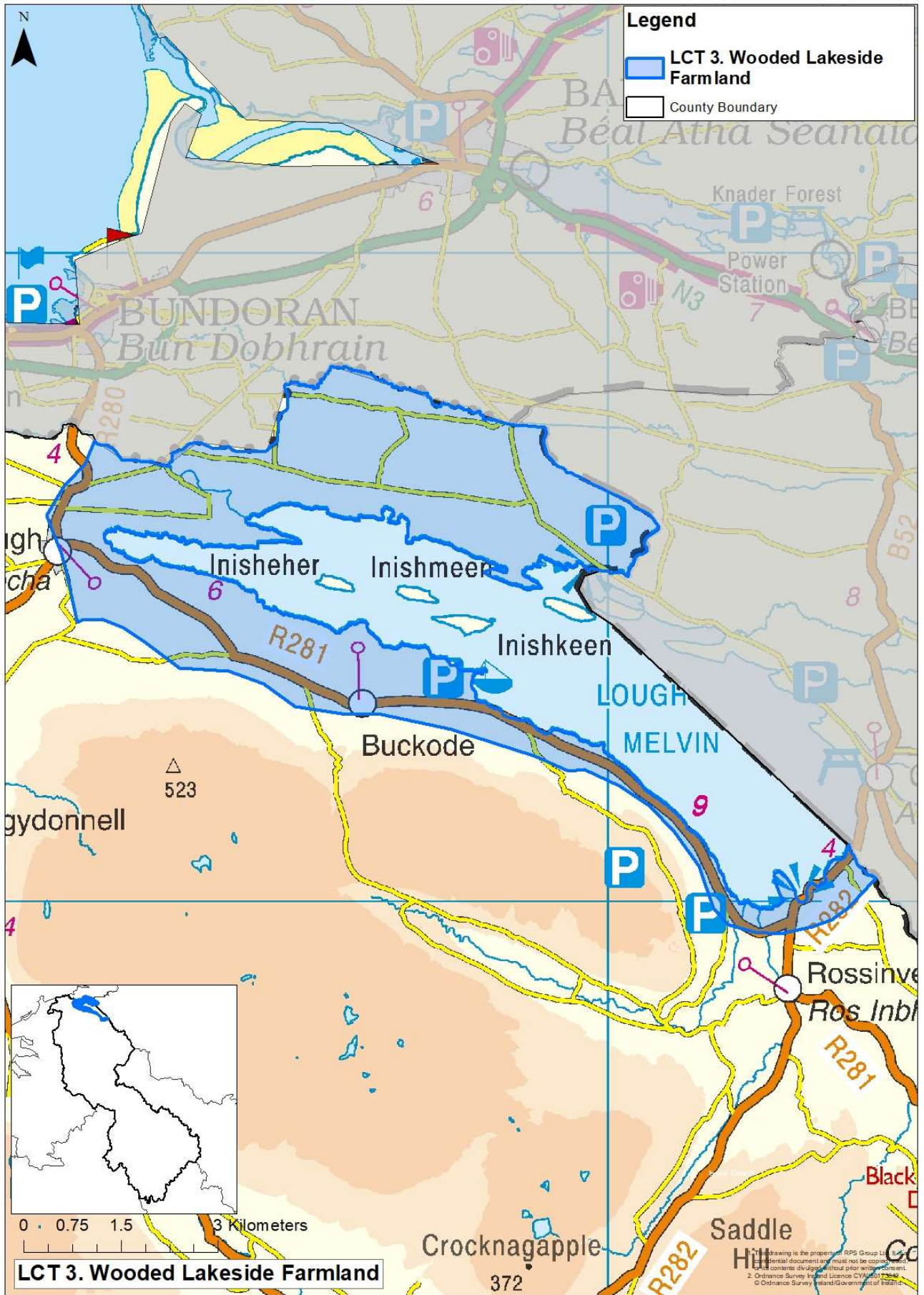
Other indicators of landscape value are the promoted walking routes and heritage attractions where landscape is an important part of the experience. There are none specifically located within this LCT although the lake scenery is enjoyed by visitors travelling generally through the area.

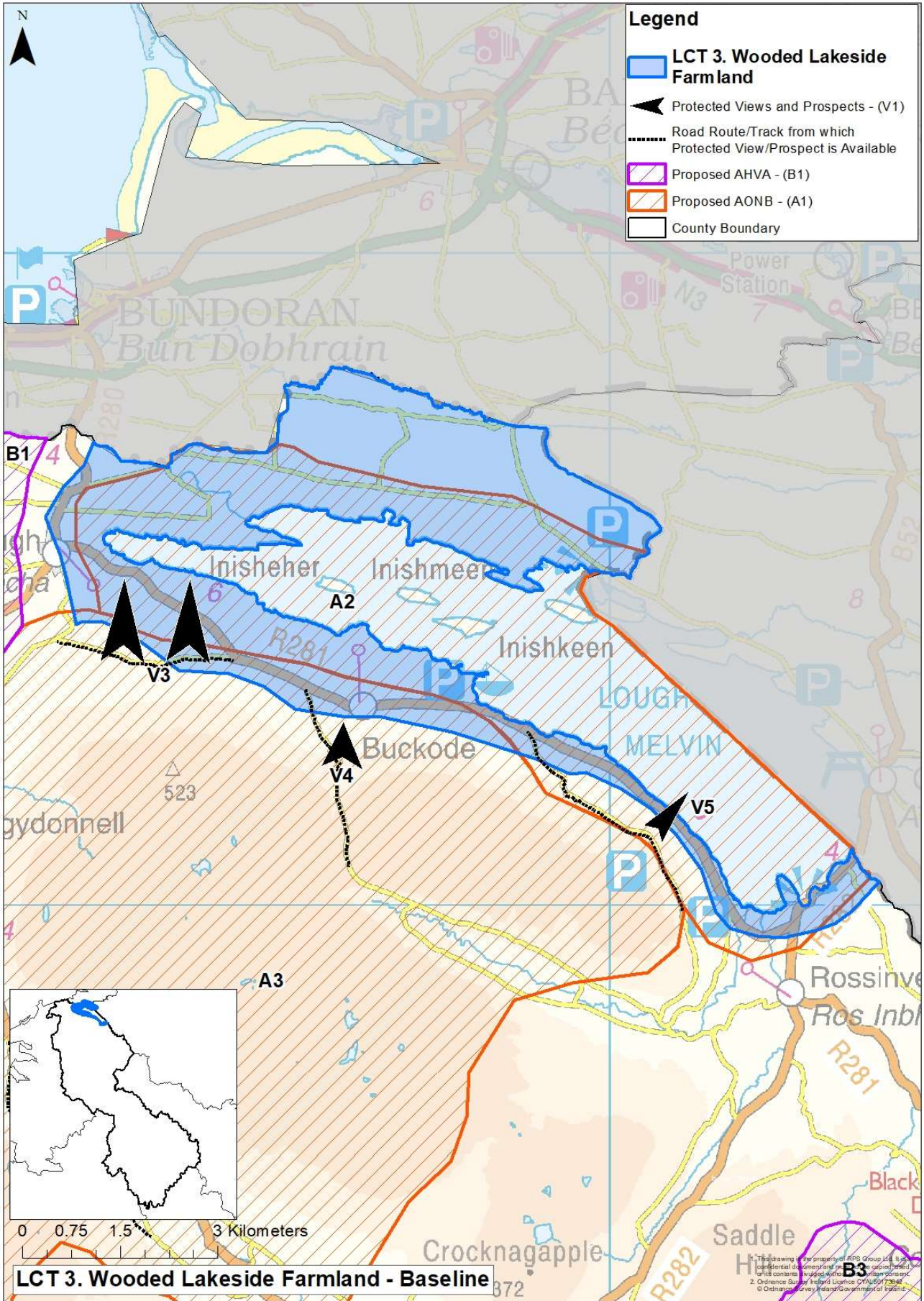
3.3.1.4 LCT 3. Wooded Lakeside Farmland – Existing commercial forestry

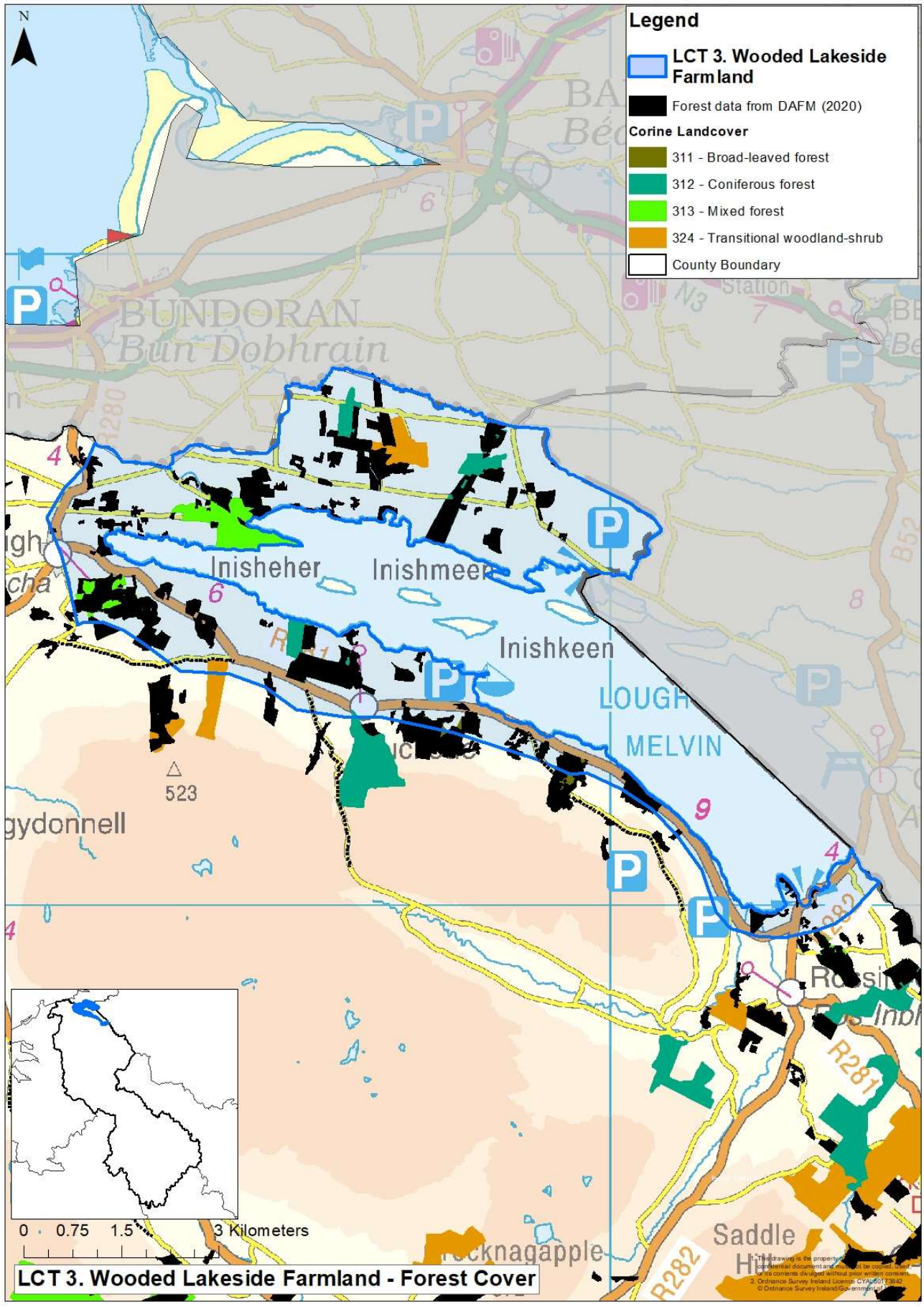
The Corine landcover data along with the available data from DAFM indicate the presence of commercial forestry plantations of varying size dispersed throughout this LCT. These commercial forestry plantations are a frequent occurrence and present as a noticeable landcover type in the landscape especially in the vicinity of Kinlough.

3.3.1.5 Baseline Maps

The baseline for this LCT is illustrated in the following three map figures. A detailed location map is presented and this is followed by a baseline map indicating the location of proposed landscape designations, protected views and prospects. Finally, a map which presents the baseline woody vegetation cover and commercial forest cover is also presented.







3.3.2 LCT 3. Wooded Lakeside Farmland – Assessment of Sensitivity to Commercial Forestry

The assessment of the sensitivity of LCT 3 Wooded Lakeside Farmland to commercial forestry is presented below and takes account of natural criteria (including landform, landcover, scale and landscape context), visual and perceptual criteria and indicators of landscape value such as presence of designations, protected views and promoted walking routes and heritage attractions. The presence and extent of existing commercial forestry plantations is also considered in the sensitivity assessment.

3.3.2.1 LCT 3. Wooded Lakeside Farmland – Landform, landcover and scale

This landscape around Lough Melvin features an undulating relatively simple landform which would generally be less sensitive to commercial forestry. Landform at the shoreline of Lough Melvin is however more complex, featuring promontories and islands within the lake and at the lake margin. These areas are generally more sensitive to commercial forestry.



Complex landform at Gubanummera Point and Inishtemple Island on the southern shoreline of Lough Melvin.

The landscape away from the lake with its mosaic of farmland and wooded areas is less sensitive to commercial forestry. Frequent woodlands of varying size result in a visually enclosed landscape which would have some ability to absorb commercial forestry of an appropriate scale. The more open areas of this landscape along with areas featuring a well defined small scale field patterns in pasture would be more sensitive to commercial forestry planting.

The Corine landcover data along with the available data from DAFM indicate the presence of commercial forestry as randomly dispersed plantations of varying scale. Some of these are located at the shoreline of Lough Melvin where they are in conflict with the more complex landscape character at this location. These plantations are apparent in the landscape generally and, to some extent, undermine the key characteristics of the LCT.

3.3.2.2 LCT 3. Wooded Lakeside Farmland – Landscape context

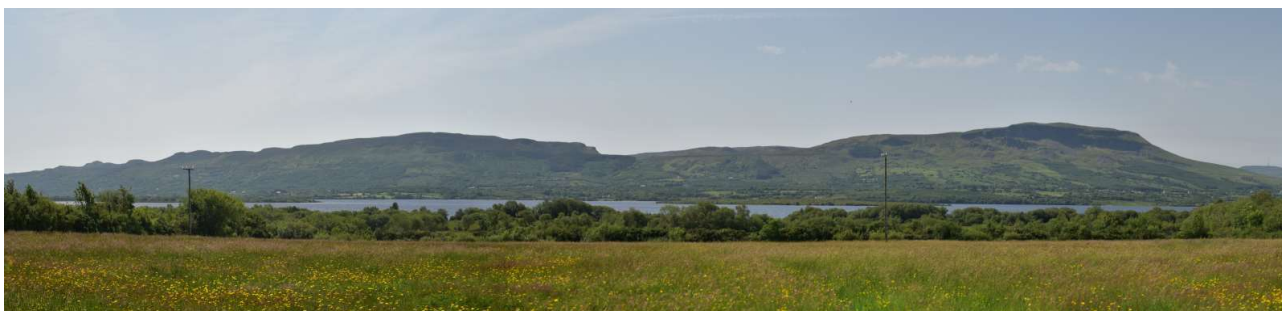
Parts of this landscape, especially in the south west overlook Donegal Bay in the distance and these areas would be sensitive to commercial forestry which would obstruct the visual relationship with the bay. The landscape at the shoreline of Lough Melvin would also be highly sensitive to commercial forestry which would obstruct the visual relationship with the lake. The landscape along the southern shoreline of the lake is overlooked by the dramatic presence of Arroo Mountain. The landscape along the northern shoreline of Lough Melvin would also be sensitive to commercial forestry which could potentially obstruct views of the wider mountain backdrop of Arroo and Sheenun.



Arroo Mountain overlooking the farmed landscape near the southern shoreline of Lough Melvin.

3.3.2.3 LCT 3. Wooded Lakeside Farmland – Visual and perceptual criteria

The farmed landscape is tranquil. The landscape close to Lough Melvin is tranquil and visually open and would be highly sensitive to commercial forestry which could obstruct scenic views of the lake and the wider context of the mountain backdrop to the south. The farmed landscape away from the lake is more visually enclosed due to the presence of existing woodland and hedgerows and is of lower sensitivity.



The skyline of Arroo Mountain and Sheenun viewed from the northern side of Lough Melvin.

3.3.2.4 LCT 3. Wooded Lakeside Farmland – Landscape Value

The majority of this landscape is designated as AONB apart from an area of farmland to the north. This is reflective of the scenic quality of the area especially the lake and outlook to the mountains further south. The scenic value is also reflected in the protected views within.

3.3.2.5 LCT 3. Wooded Lakeside Farmland – Sensitivity ranking

This LCT is considered to be of **high** sensitivity to commercial forestry. The majority of this LCT is covered by proposed AONB designations and this is reflective of the landscape and scenic quality in particular along the lakeshore.

3.4 LCT 4. Clifed Uplands and Landslips

3.4.1 Baseline

There are six occurrences of LCT 4 Clifed Uplands and Landslips within County Leitrim. These are located as follows:

- At the edge of the Moorland Plateau below Truskmore overlooking Glencar Lough;
- At the edge of the Moorland Plateau in the vicinity of Tievebaun and Truskmore where the cliffs overlook the glacial corries within the Glenade Valley;
- At two locations on the edge of the Moorland Plateau at Arroo Mountain; and
- At two locations on the edge of the Moorland Plateau at Slieve Anierin.

3.4.1.1 LCT 4. Clifed Uplands and Landslips – Landscape Character Description

The 'Leitrim Landscape Character Assessment Review' described LCT 4 Clifed Uplands and Landslips as follows.

'The Clifed Margins, detached masses and landslips associated with this LCT were formed by the erosive action of glaciers and these are present in the landscape of today as distinctive and dramatic features such as that at Eagle's Rock. They usually occur below the moor topped uplands and can be seen as distinctive rock formations from within the major glens. Huge sections of the upper parts of the cliffs have broken off in places and have either slipped downwards leaving extensive scree and colluvial slopes, bare rock faces and cliffs which hang above the agricultural landscapes below. In other locations, the wear and tear of glaciation has resulted in the forming of hollowed out rockfaces or corries, of which fine examples are to be seen at Tievebaun Mountain in the north west. Land cover is typically sparse in these locations, although grassland has colonised some of the stabilised scree slopes.'

3.4.1.2 LCT 4. Clifed Uplands and Landslips – Designated landscapes, views and prospects

The 'Leitrim Review of Landscape Designations' report reflects the value of particular landscapes in County Leitrim and are recognised as such in the draft County Development Plan. The entire LCT is designated with the following tabulated below.

Table 3-9: LCT 4. Designated Landscapes

MAP ID	Designated Landscapes
A3	Mountains and Glens of North Leitrim AONB – applies to this LCT at Arroo and Tievebaun Mountain ranges
A8	Slieve Anierin and Bencroy AONB – applies to this LCT at Slieve Anierin

The 'Leitrim Review of Views and Prospects' report also reflects the value of particular landscapes and are recognised as such in the draft County Development Plan. None occur within this landscape and this is probably due to the relative inaccessibility of same. The distinctive features in this landscape are the subject of many protected views and prospects located outside its boundary. These are tabulated below.

Table 3-10: LCT 4. Views and Prospects

MAP ID	Views and Prospects
V6	View towards Glenade Lake and Valley
V20	View towards Arroo
V25	View of Mountain and Glen Landscape of Tievebaun and Arroo from the R280 Regional Road
V27	View towards Eagle's Rock

3.4.1.3 LCT 4. Clifed Uplands and Landslips – Promoted walking routes and heritage attractions

Other indicators of landscape value are the promoted walking routes and heritage attractions where landscape is an important part of the experience. These are tabulated below.

Table 3-11: LCT 4. Walking Routes and Heritage Attractions

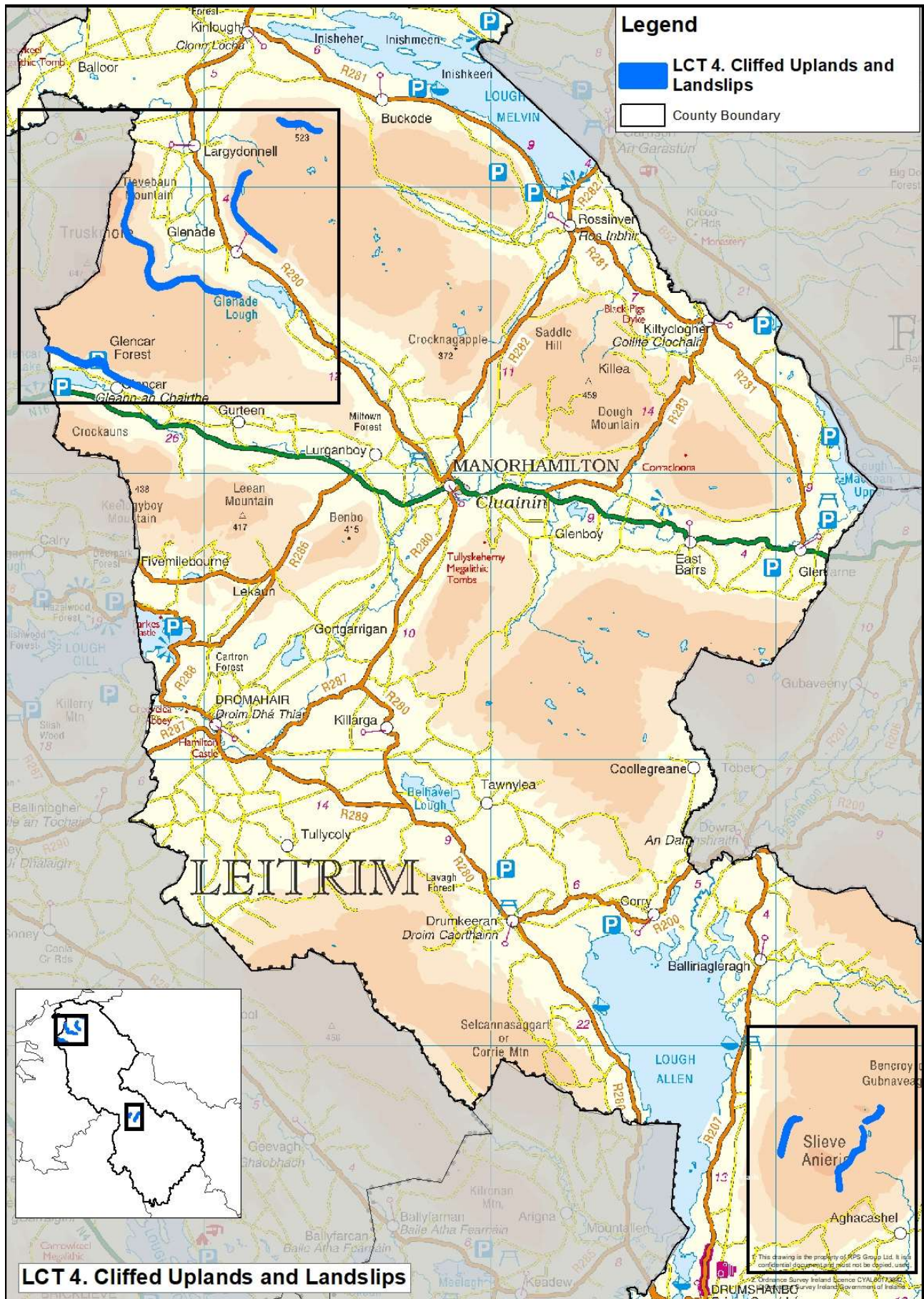
MAP ID	Walking Route / Heritage Attraction
T11	Glencar Hill Walk is a looped linear trail which approaches the cliff landscape in this LCT at the southern side of Truskmore and overlooks Glencar Lough.
N/A	Eagle’s Rock is a promoted heritage attraction and point of interest in this LCT in the vicinity of Tievebaun Mountain enjoyed from protected view V27.

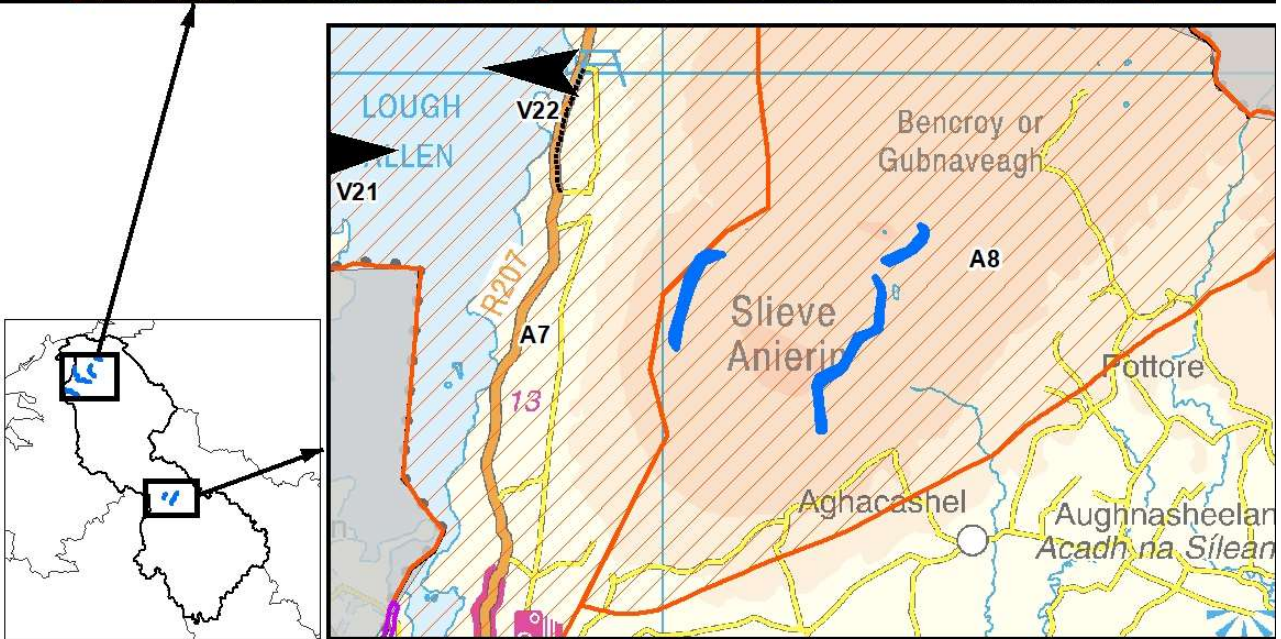
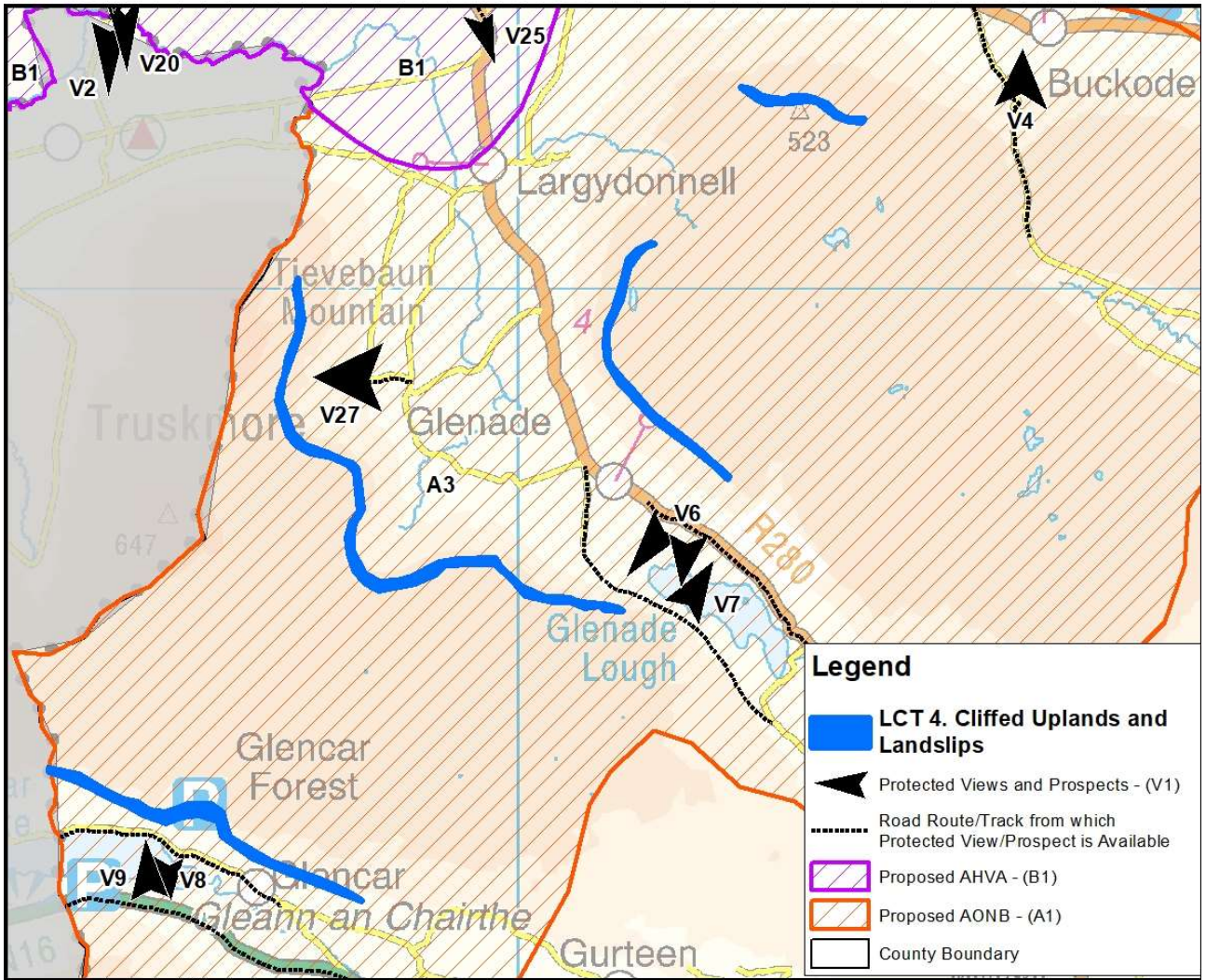
3.4.1.4 LCT 4. Clifed Uplands and Landslips – Existing commercial forestry

The Corine landcover data along with the available data from DAFM indicate no commercial forestry cover in this LCT and the absence of same reflects the natural conditions for which commercial forestry would not be feasible.

3.4.1.5 Baseline Maps

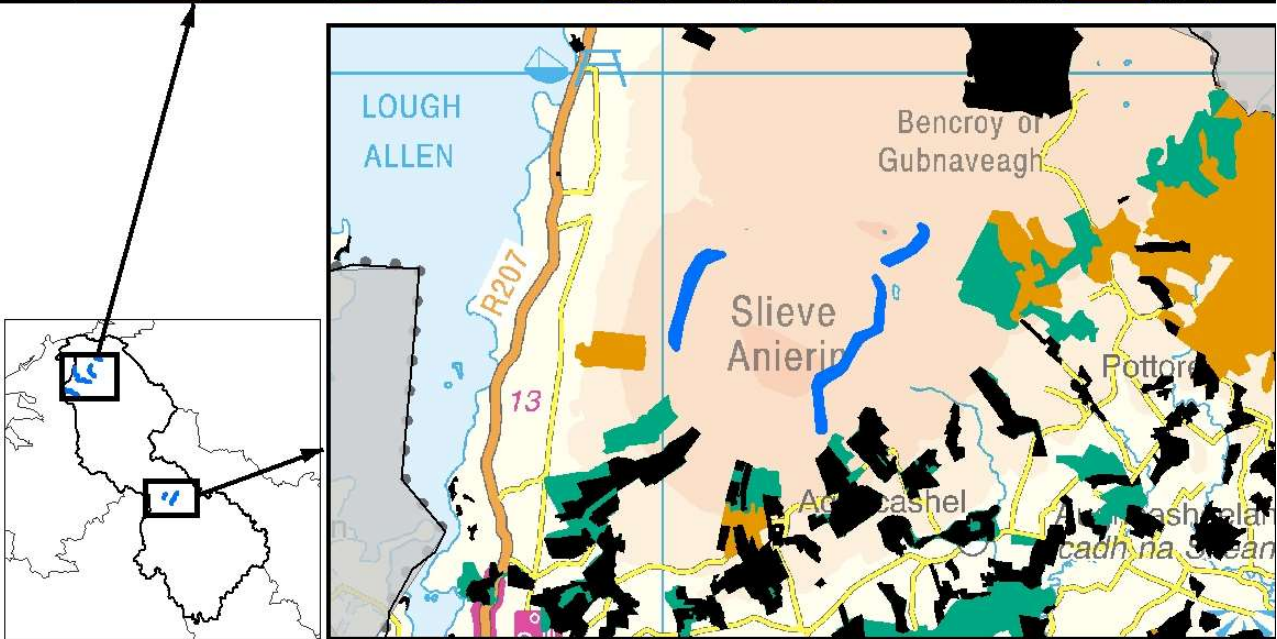
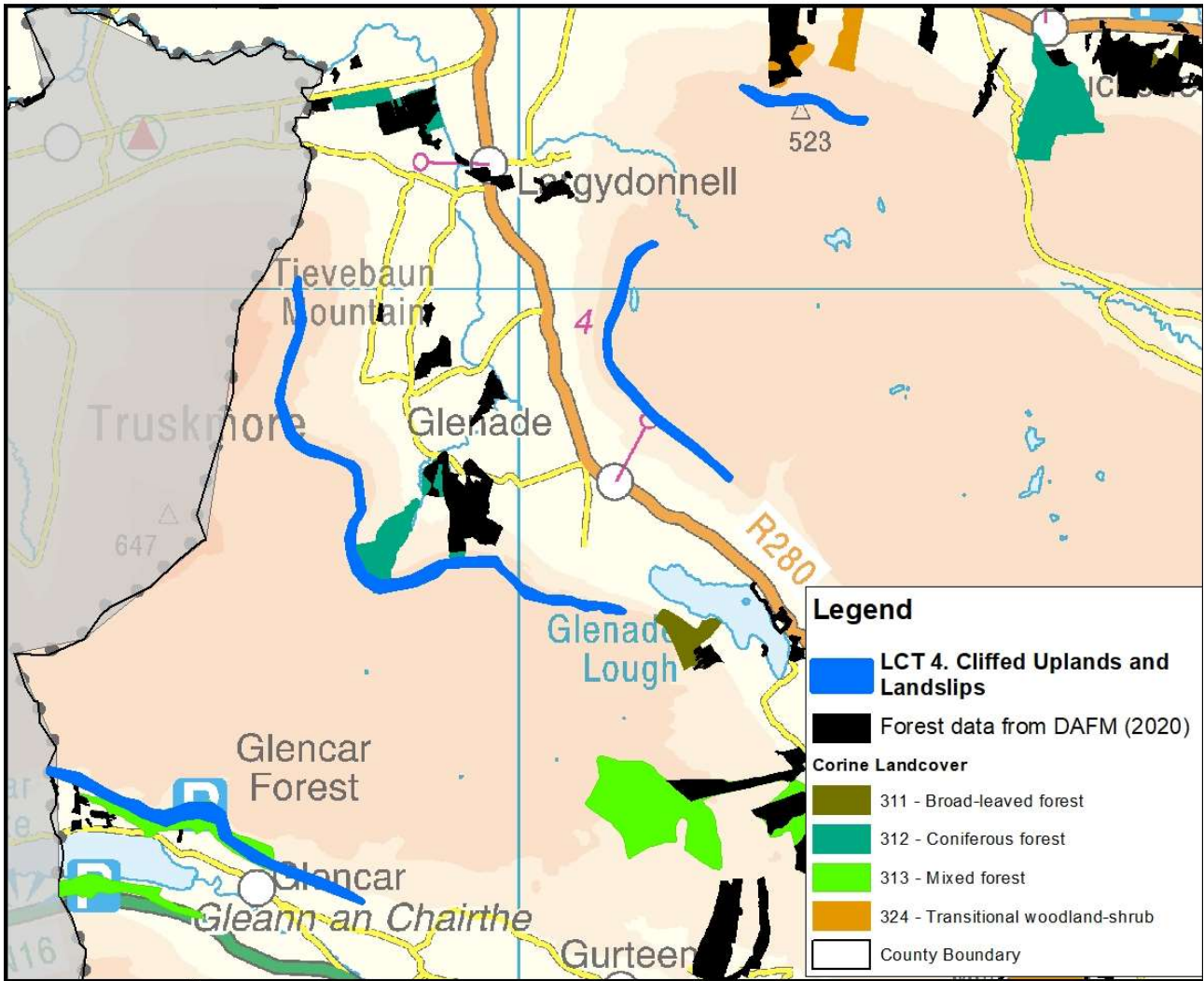
The baseline for this LCT is illustrated in the following three map figures. A detailed location map is presented and this is followed by a baseline map indicating the location of proposed landscape designations, protected views and prospects. Finally, a map which presents the baseline woody vegetation cover and commercial forest cover is also presented.





LCT 4. Cliffed Uplands and Landslips - Baseline

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LCT 4. Clified Uplands and Landslips - Forest Cover

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3.4.2 LCT 4. Cluffed Uplands and Landslips – Assessment of Sensitivity to Commercial Forestry

The assessment of the sensitivity of LCT 4 Cluffed Uplands and Landslips to commercial forestry is presented below and takes account of natural criteria (including landform, landcover, scale and landscape context), visual and perceptual criteria and indicators of landscape value such as presence of designations, protected views and promoted walking routes and heritage attractions. The presence and extent of existing commercial forestry plantations is also considered in the sensitivity assessment.

3.4.2.1 LCT 4. Cluffed Uplands and Landslips – Landform, landcover and scale

This landscape comprises steep to vertical cliffs located at the highest elevations in the county. These are distinctive complex landforms. These complex features are the focus of many views from valleys and lowland areas. They are highly sensitive to commercial forestry which would undermine their prominence and rugged character and which could obstruct scenic views of the features in the valleys.

The steep cliffs comprise mostly bare rock with limited, if any, scrub vegetation. The scale of these features varies with their location. The barren conditions are such that they are unlikely to be considered for commercial forestry.



Steep sides to the Glenade Valley overlooked by the Cliffs near Truskmore. These are distinctive landforms which are highly sensitive to commercial forestry.



Cliffs at the Arroo Mountain Range overlook the Glenade Valley are also highly sensitive to commercial forestry.

3.4.2.2 LCT 4. Cluffed Uplands and Landslips – Landscape context

The cliffs and landslips are distinctive features that occur within or adjacent to LCT 5 Moorland Plateau. They also overlook lower lying landscapes including LCT 6 Moorland Hills and LCT 7 Upland Farmland and Foothills. The context for this landscape is important in terms of safeguarding it from future commercial forestry in adjacent LCTs which would potentially mask the striking cliff features of this landscape. In this regard, areas within the adjacent landscapes of the Moorland Plateau and the Moorland Hills would be especially sensitive to commercial forestry because of its relationship or setting as the foreground to the Cluffed Uplands and Landslips.



Cliffs and glacial carries near Truskmore overlook the lower lying landscapes of the Glenade Valley.

3.4.2.3 LCT 4. Cluffed Uplands and Landslips – Visual and perceptual criteria

The cliffs and landslips are important focal points in views from valleys and lowland areas and are seen in many of the county protected views. A sense of wildness and tranquillity is generally perceived by the viewer. An outstanding scenic quality is associated with these bare areas of wilderness with little landcover and distinctive rugged profile and as a result are highly sensitive to commercial forestry.

3.4.2.4 LCT 4. Cluffed Uplands and Landslips – Landscape Value

The entire LCT 4 Cluffed Uplands and Landslips is designated as an AONB as outlined above. The designation reflects the scenic quality and outstanding natural beauty of these cliffs and landslips. They are also the subject of many protected views and prospects in the surrounding landscape. The distinctive feature of Eagle's Rock is promoted as a heritage attraction and the Glencar Hill Walk is routed to afford views of the cliffs and landslips. As a result, LCT 4 is a highly valued landscape, the scenic quality and recreational value of which would be easily undermined by commercial forestry.

3.4.2.5 LCT 4. Cluffed Uplands and Landslips – Sensitivity ranking

This LCT is considered to be of **very high** sensitivity to commercial forestry. The entire landscape is covered by proposed AONB designations. The natural characteristics, in particular the distinctive landforms associated with the cliffs and landslips are highly sensitive to commercial forestry and are important features in protected views from the surrounding lower lying areas. The cliffs and landslips form the distinctive skylines to many of the mountain views, including protected views attained from landscapes at lower elevations.

3.5 LCT 5. Moorland Plateau

3.5.1 Baseline

There are nine occurrences of LCT 5 Moorland Plateau within County Leitrim. These include:

- Mountain and hill ranges associated with Tievebaun, Arroo and Sheenun that frame the Glenade and Glenaniff Valleys in the north of the County;
- Benbo, located west of Manorhamilton;
- Dough Mountain and Thur Mountain, located east of Manorhamilton;
- The Boleybrack Mountains, located north of Lough Allen;
- Corry Mountain, located west of Lough Allen; and
- Slieve Anierin, located east of Lough Allen.

3.5.1.1 LCT 5. Moorland Plateau – Landscape Character Description

The ‘Leitrim Landscape Character Assessment Review’ described LCT 5 Moorland Plateau as follows.

‘The Moorland Plateaus is one of the most remote, elevated exposed and expansive landscape character types in Leitrim. It is generally characterised by smooth rolling landform with isolated steep escarpments and rocky cliffs at elevations exceeding 300 m AOD. Land cover is predominantly a mosaic of upland blanket bog and heath, with occasional sheep grazing. In some cases, the blanket bog is active in terms of peat formation whilst in other areas, it is degraded as a result of cutover activities and drainage. Localised erosion gives rise to crags and peat hags exposing the underlying rocks. Small upland loughs drained by streams are located throughout. The plateaus have a sense of wilderness and remoteness. These areas are visually open and their expansiveness is enhanced by the dominance and enormity of the sky. Few roads or tracks are present. Patches of commercial coniferous forestry feature in this landscape and in some locations, these plantations have eroded the moorland landscape character. Wind turbines are a recent feature in this landscape character type in the Corry Mountain area in particular. The mosaic of upland habitats are of significant nature conservation value. Colours are muted and monochromatic.’

3.5.1.2 LCT 5. Moorland Plateau – Designated landscapes, views and prospects

The ‘Leitrim Review of Landscape Designations’ report reflects the value of particular landscapes in County Leitrim and are recognised as such in the draft County Development Plan. The designations that occur within this LCT are tabulated below.

Table 3-12: LCT 5. Designated Landscapes

MAP ID	Designated Landscapes
A3	Mountains and Glens of North Leitrim AONB - applies to the entire LCT in the north including Kings Mountain, Arroo and summit west of Sheenun
A5	Benbo AONB – applies to the entire LCT at Benbo
A6	The Boleybrack Mountains AONB – applies to the entire LCT in this mountain range
A7	Lough Allen – applies to the entire LCT within the Slieve Anierin Mountain range
A8	A8 Slieve Anierin and Bencroy AONB - applies to the entire LCT within these mountain ranges
B3	B3 Dough Mountain AHVA – applies to the entire LCT at Dough Mountain
B4	B4 Thur Mountain AHVA – applies to the entire LCT at Thur Mountain
B7	B7 Corry Mountain AHVA – applies to the southern part of this LCT at Corry Mountain

The ‘Leitrim Review of Views and Prospects’ report is also recognised in the draft County Development Plan. None occur within this landscape and this is probably due to the relative inaccessibility of this landscape. The distinctive features in this landscape are the subject of many protected views and prospects located outside this LCT including the following tabulated below.

Table 3-13: LCT 5. Views and Prospects

MAP ID	Views and Prospects
V2	View towards Tievebaun, Truskmore and Kings Mountain
V6	View towards Glenade Lake and Valley – These views are attained against the backdrop of Tievebaun and Truskmore Mountains
V7	View towards Glenade Lake and Valley – These views are attained against the backdrop of The Arroo Mountain Range and along the lakeshore where the striking Glenade Valley is framed by the mountain ranges of Arroo and Tievebaun on opposing sides
V8	View towards Glencar Lake - These views are attained against the backdrop of Tievebaun and Truskmore Mountains
V9	View towards Glencar Lake from N16 Road - These views are attained against the backdrop of Tievebaun and Truskmore Mountains
V10	View towards Benbo Mountain from the outskirts of Manorhamilton
V17	View of Benbo from O'Donnell's Rock
V20	View towards Arroo and Tievebaun Mountains from the farmed hinterland near the coast
V21	View towards Lough Allen from the R280 - These views are attained against the backdrop of Slieve Anierin
V24	View of Slieve Anierin and Lough Scur from the R209 Regional Road
V25	View of Mountain and Glen Landscape of Tievebaun and Arroo from the R280 Regional Road

3.5.1.3 LCT 5. Moorland Plateau – Promoted walking routes and heritage attractions

Other indicators of landscape value are the promoted walking routes and heritage attractions where landscape is an important part of the experience. These are tabulated below.

Table 3-14: LCT 5. Walking Routes and Heritage Attractions

MAP ID	Walking Route / Heritage Attraction
T9	The Miner's Way long distance walking route extends through this LCT at Corry Mountain
T10	The Leitrim Way long distance walking route extends through this LCT in the Boleybrack Mountains
-	Bencroy is associated with the local history of the coal mining and a commemorative plaque is located on the south eastern face of this mountain dedicated to the local miners who worked there. Another commemorative plaque nearby is dedicated to the settlers from Ulster who lived on the mountain in the early 1800s

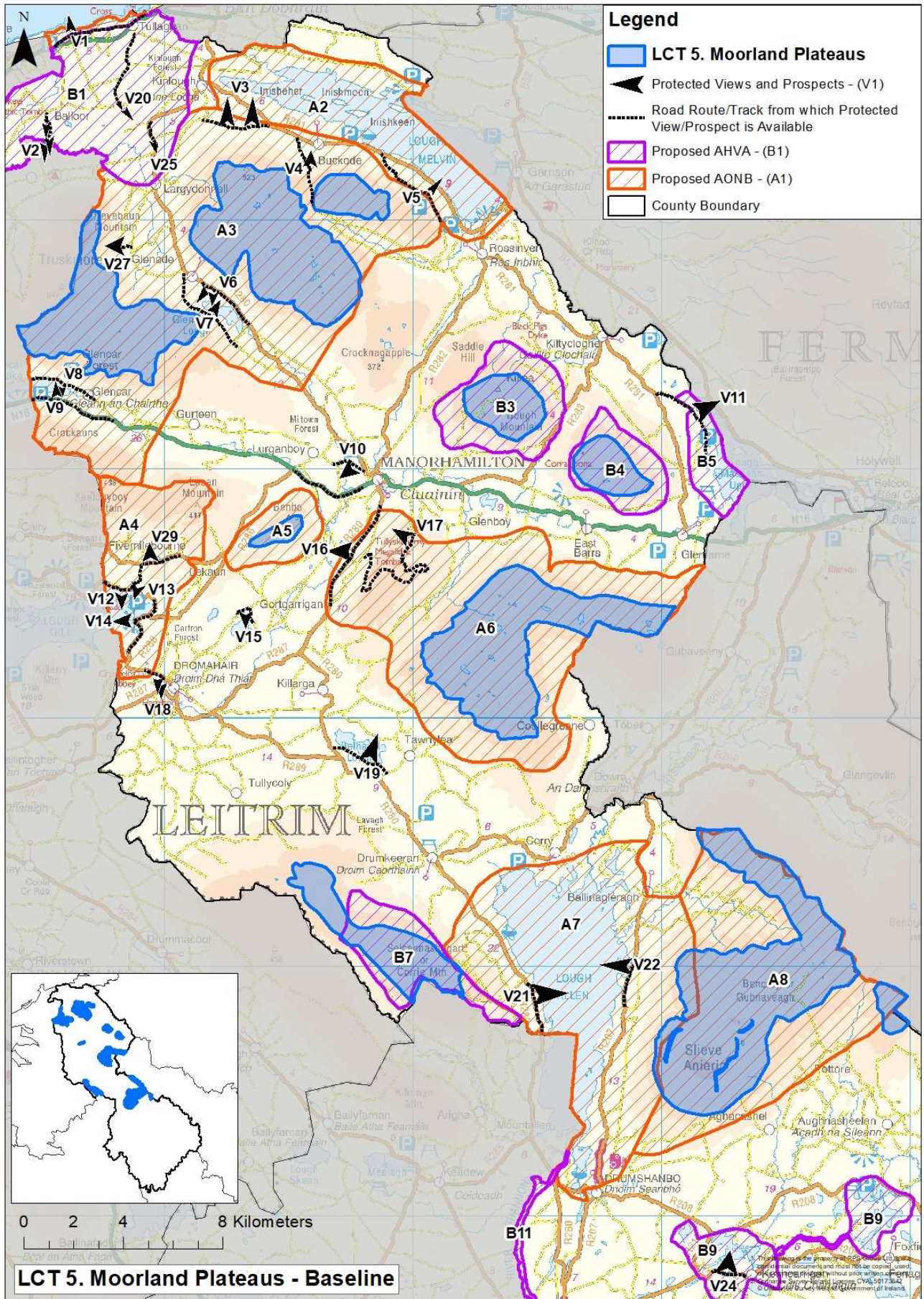
3.5.1.4 LCT 5. Moorland Plateau – Existing commercial forestry

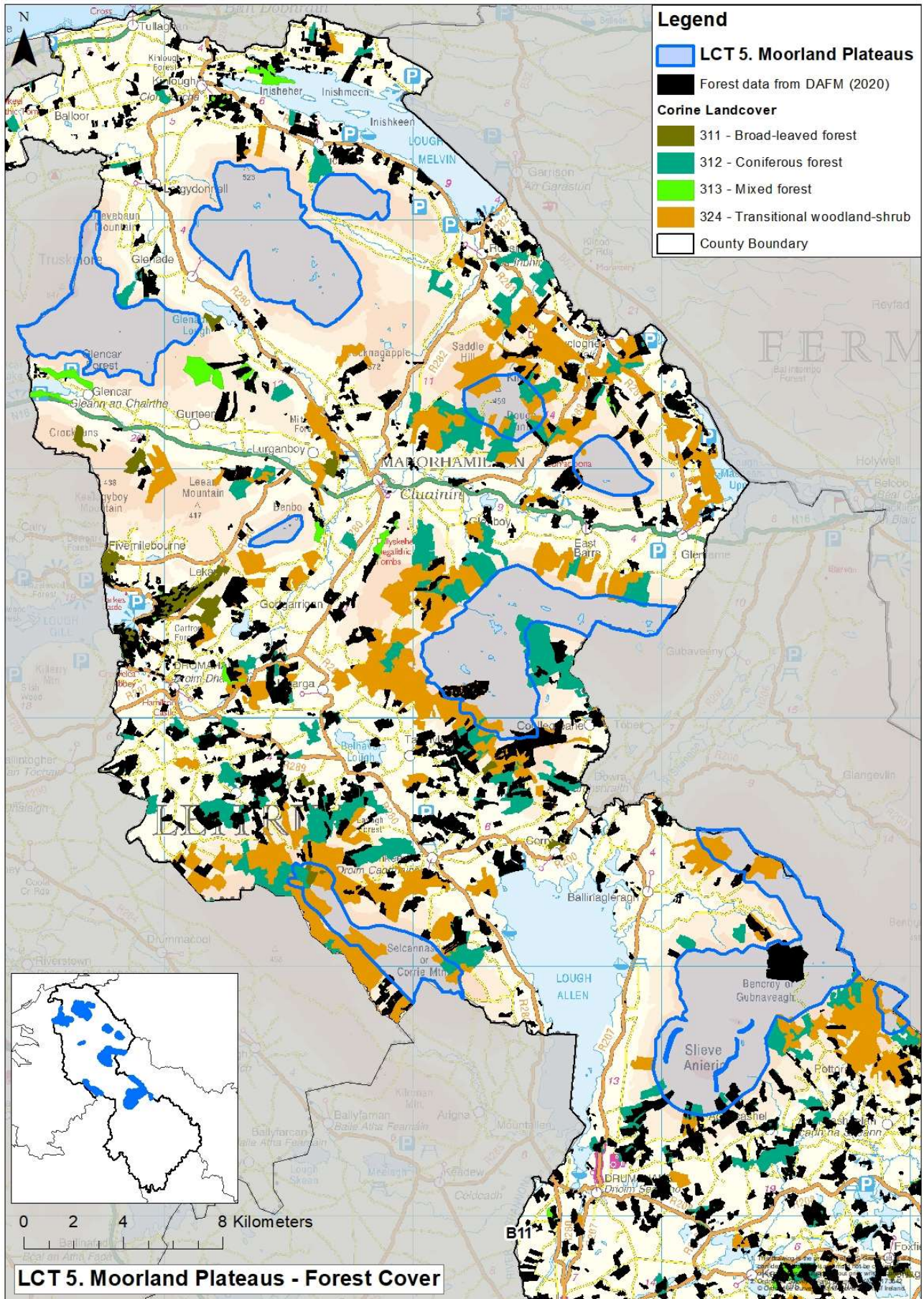
The Corine landcover data along with the available data from DAFM indicate the presence of commercial forestry, mostly in the vicinity of Dough Mountain and to some extent, Thur Mountain along with Slieve Anierin and Bencroy.

3.5.1.5 Baseline Maps

The baseline for this LCT is illustrated in the following three map figures. A detailed location map is presented and this is followed by a baseline map indicating the location of proposed landscape designations, protected views and prospects. Finally, a map which presents the baseline woody vegetation cover and commercial forest cover is also presented.







3.5.2 LCT 5. Moorland Plateau – Assessment of Sensitivity to Commercial Forestry

The assessment of the sensitivity of LCT 5 Moorland Plateau to commercial forestry is presented below and takes account of natural criteria (including landform, landcover, scale and landscape context), visual and perceptual criteria and indicators of landscape value such as presence of designations, protected views and promoted walking routes and heritage attractions. The presence and extent of existing commercial forestry plantations is also considered in the sensitivity assessment.

3.5.2.1 LCT 5. Moorland Plateau – Landform, landcover and scale

The gently rolling landform associated with moorland is generally less sensitive to commercial forestry due to the simplicity of the landform compared with areas with more complex landforms with distinctive and prominent hills. An exception to this are the areas of moorland at the edges or boundaries of this LCT which overlook the steep cliffs and valley sides of the lowland glen landscapes. These along with the cliffs form important and distinctive skylines to the lower lying landscapes. The summit of Benbo is especially sensitive due to its distinctive cleft within the moorland plateau landscape which presents as a distinctive landmark that is highly sensitive to commercial forestry. Also the steep sided slopes on the west side of Slieve Anierin which form the foreground to distinctive cliffs and landslips in the adjacent LCT 4 Clifed Uplands and Landslips would be particularly sensitive to commercial forestry.

The eastern and southern sides of Thur Mountain and the southern side of Slieve Anierin features large areas of commercial forestry which is present as a large scale element and is in contrast with the moorland landscape character. These areas would be especially sensitive to further commercial forestry which would continue to become the dominant landcover and would erode the original landcover (mosaic of grassland, bog and heath) as a key characteristic of this area.

The scale of this moorland landscape is vast with little by way of features such as field patterns as a scale reference. The openness and scarcity of wooded vegetation however is such that the introduction of commercial forestry would be in conflict with the open character of this landscape. Areas that feature moor and bog along with isolated small loughs are considered to be highly sensitive to commercial forestry.

3.5.2.2 LCT 5. Moorland Plateau – Landscape context

This is one of the most elevated landscapes in the county. The edges of these large areas of moorland form the skyline and backdrop to adjacent lower lying landscapes including LCT 6 Moorland Hills and LCT 7 Upland Farmland and Foothills. The edges or boundaries of this landscape along with the most elevated mountain summits are highly sensitive to commercial forestry which would obstruct their steep sided form and rugged character which presents as a distinctive scenic backdrop to the valley landscapes below. This landscape is especially important to the setting of LCT 4 Clifed Uplands and Landslips as referred to above.

Benbo is a distinctive hilltop within a farmed valley and lowland setting and is sensitive to commercial forestry which would be in conflict with its distinctive profile and would undermine its prominence within the valley setting close to the town of Manorhamilton.



Outlook towards the mountain skyline of Benbo from Manorhamilton.

3.5.2.3 LCT 5. Moorland Plateau – Visual and perceptual criteria

This is a remote landscape with a definite sense of wildness and tranquillity. Important skylines are present and are viewed as being of considerable scenic quality and highly sensitive to commercial forestry which would obstruct views of these uplands including Arroo, King's Mountain, Truskmore and The Boleybrack Mountains enjoyed from the surrounding valleys and by users of the Leitrim Way. Commercial Forestry would also undermine the wild and rugged character of this landscape.

3.5.2.4 LCT 5. Moorland Plateau – Landscape Value

LCT 5 Moorland Plateau is almost entirely designated apart from a small area north of Corry Mountain. The designations include AONBs and AHVAs and reflect the landscape quality and outstanding natural beauty of these moorland landscapes including natural features such as bog and heather moorland together with the sense of wildness and tranquillity. They are also the subject of many protected views and prospects in the surrounding lowland landscape. As a result, LCT 5 is a highly valued landscape, the scenic quality and natural character of which would be easily undermined by commercial forestry.

3.5.2.5 LCT 5. Moorland Plateau – Sensitivity ranking

This LCT is considered to be of **very high** sensitivity to commercial forestry. Almost all of this LCT is covered by proposed AONB and proposed AHVA designations and this is reflective of the landscape and scenic quality. The nature of the landform and landcover and overall remote and wild qualities contribute towards the sensitivity ranking along with the scenic skylines enjoyed by viewers which feature in many proposed protected views in adjacent LCTs at lower elevations.

3.6 LCT 6. Moorland Hills

3.6.1 Baseline

LCT 6 Moorland Hills is an extensive landscape of foothills to the following mountain ranges:

- Tievebaun and Truskmore;
- Arroo and adjacent mountains;
- Dough Mountain;
- Thur Mountain;
- Leean Mountain range (Doons and Crockauns);
- Benbo;
- The Boleybrack Mountains;
- Corry Mountain; and
- Slieve Anierin.

3.6.1.1 LCT 6. Moorland Hills – Landscape Character Description

The ‘Leitrim Landscape Character Assessment Review’ described LCT 6 Moorland Hills as follows.

‘The Moorland Hills are generally located between 200 and 300 m AOD and comprise relatively steep sided slopes leading up to the plateaus areas or mountain tops. These comprise marginal land with little or no hedgerow enclosure or field pattern. Hillsides generally allow long views across the surrounding lowlands except where woodland cover is extensive. Land cover is typically upland blanket bog, heather moor and unimproved grassland extensively grazed by free roaming sheep. Some field patterns are discernible as low earth banks and post and wire fences. Large tracts of plantation coniferous forest are dispersed throughout. Some deciduous woodland and scrub occupies the lower slopes. Fast rocky streams draining the upper peat bogs descend down through the hills and offer secluded steep sided valleys and ravines in which scrub and trees can thrive. The moorland hills are generally sparse in terms of settlement although tracks and roads are more frequent in this LCT than in the wilder moorland plateaus. Roads and tracks are often fringed by post and wire fences.’

3.6.1.2 LCT 6. Moorland Hills – Designated landscapes, views and prospects

The ‘Leitrim Review of Landscape Designations’ report reflects the value of particular landscapes in County Leitrim and are recognised as such in the draft County Development Plan. The designations that occur within this LCT are tabulated below.

Table 3-15: LCT 6. Designated Landscapes

MAP ID	Designated Landscapes
A3	Mountains and Glens of North Leitrim AONB - applies to most of this LCT in the north in the vicinity of Kings Mountain, Arroo and Sheenun along with the lower slopes of The Doons and Crockauns
A5	Benbo AONB – applies to the entire LCT along the lower slopes of Benbo
A6	The Boleybrack Mountains AONB – applies to the majority of the LCT on the lower slopes of the Boleybrack Mountains
A7	Lough Allen AONB – applies to part of the LCT in the vicinity of Lough Allen
A8	Slieve Anierin and Bencroy AONB - applies to the majority of the LCT within the lower slopes of the Slieve Anierin Mountain range
B3	Dough Mountain AHVA – applies to most of this LCT on the lower slopes of Dough Mountain
B4	Thur Mountain AHVA – applies to most of this LCT on the lower slopes of Thur Mountain
B7	Corry Mountain AHVA – applies to the southern part of this LCT on the lower slopes of Corry Mountain

The 'Leitrim Review of Views and Prospects' report is also recognised in the draft County Development Plan. One of these occurs within this landscape as tabulated below.

Table 3-16: LCT 6. Views and Prospects

MAP ID Views and Prospects	
V17	View of Benbo from O'Donnell's Rock

3.6.1.3 LCT 6. Moorland Hills – Promoted walking routes and heritage attractions

Other indicators of landscape value are the promoted walking routes and heritage attractions where landscape is an important part of the experience. These are tabulated below.

Table 3-17: LCT 6 Walking Routes and Heritage Attractions

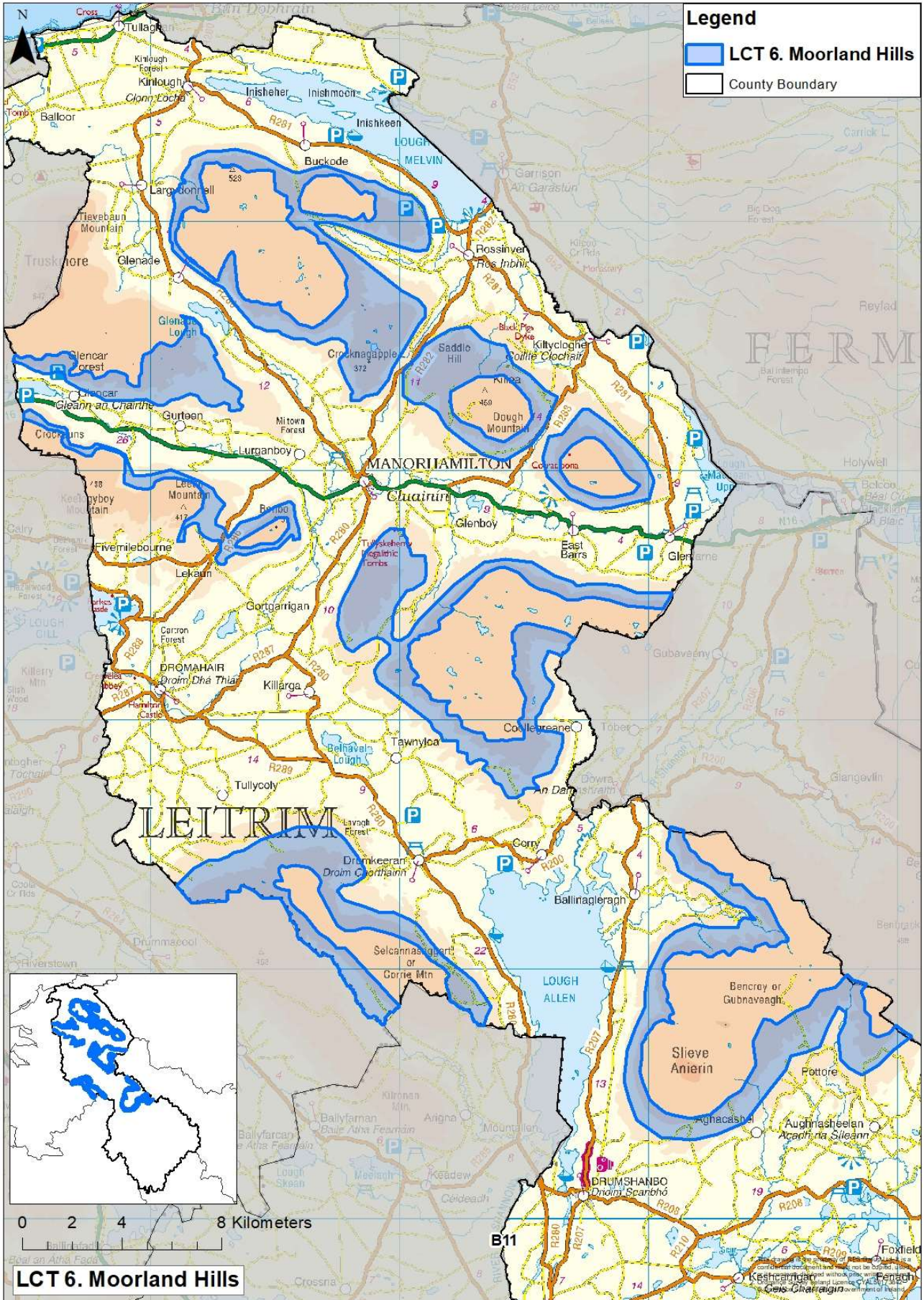
MAP ID Walking Route / Heritage Attraction	
T9	The Miner's Way long distance walking route extends through this LCT at Corry Mountain
T10	The Leitrim Way long distance walking route extends through this LCT in the Boleybrack Mountains
T11	Glencar Hill Walk is a looped linear trail which approaches the moorland hills in this LCT at the southern side of Truskmore and overlooking Glencar Lough
T13	Tullylacken Loop Walk extends through this LCT on the eastern side of Bencroy
T14	Aghacashel Loop Walk extends through this LCT on the southern side of Slieve Anierin

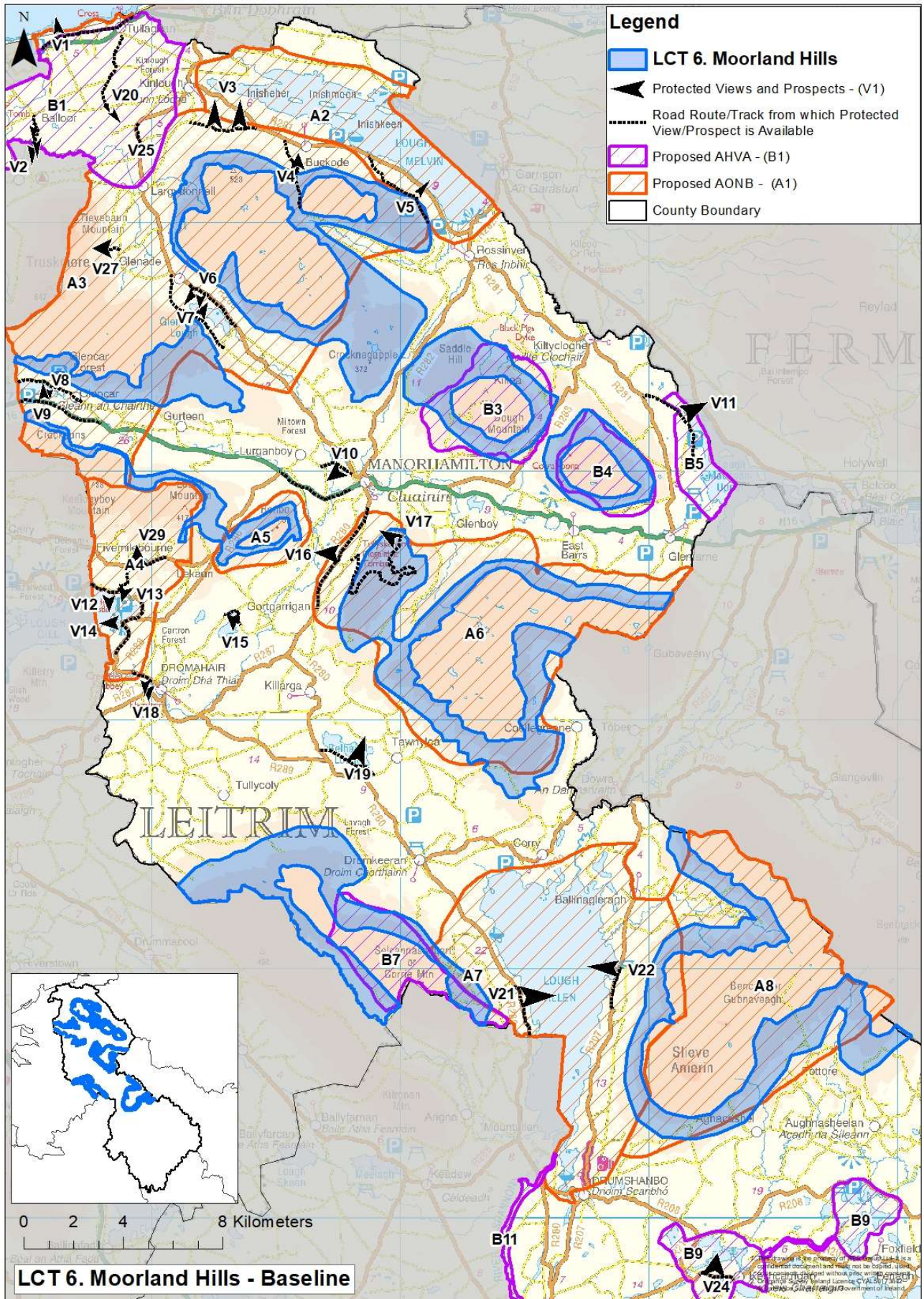
3.6.1.4 LCT 6. Moorland Hills – Existing commercial forestry

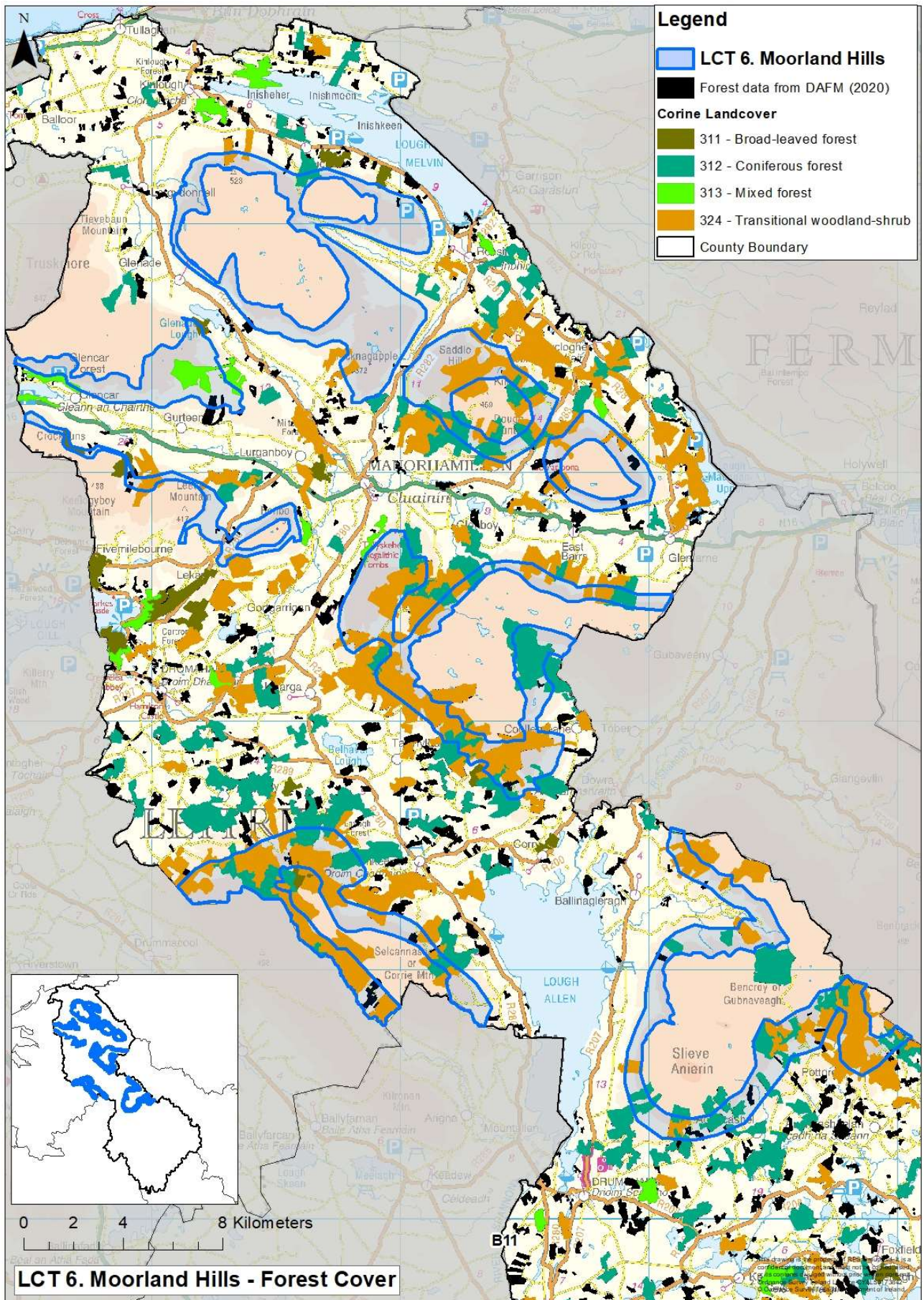
The Corine landcover data along with the available data from DAFM indicate small areas of commercial forestry throughout this landscape. Larger tracts of commercial forestry occur in the southern part of this landscape, in the foothills of the Boleybrack Mountains, Corry Mountain, Dough Mountain and Slieve Anierin.

3.6.1.5 Baseline Maps

The baseline for this LCT is illustrated in the following three map figures. A detailed location map is presented and this is followed by a baseline map indicating the location of proposed landscape designations, protected views and prospects. Finally, a map which presents the baseline woody vegetation cover and commercial forest cover is also presented.







3.6.2 LCT 6. Moorland Hills – Assessment of Sensitivity to Commercial Forestry

The assessment of the sensitivity of LCT 6 Moorland Hills to commercial forestry is presented below and takes account of natural criteria (including landform, landcover, scale and landscape context), visual and perceptual criteria and indicators of landscape value such as presence of designations, protected views and promoted walking routes and heritage attractions. The presence and extent of existing commercial forestry plantations is also considered in the sensitivity assessment.

3.6.2.1 LCT 6. Moorland Hills – Landform, landcover and scale

The landform and landcover within this landscape varies between open moorland at higher elevations to marginal farmland at lower elevations. The steep moorland and bog slopes with little hedgerow vegetation cover occur at higher elevations and are of higher sensitivity to commercial forestry, for example, at the western side of Arroo Mountain and Tievebaun and Truskmore. This is due to their rugged and open character, the scenic quality of which would be undermined by the presence of commercial forest plantations. At lower elevations, landform is gently undulating with scrub and woodland cover and is of lower sensitivity to commercial forestry which may be accommodated subject to choice of appropriate location and careful design. Areas where existing woodland and scrub is present may accommodate future commercial forestry plantations of appropriate scale that would not undermine the key characteristics of this landscape.

The foothills of the Boleybrack Mountains, Corry Mountain, Dough Mountain and Slieve Anierin would be sensitive to further commercial forestry planting which combined with that existing, could result in erosion of original landcover as a key characteristic of this landscape.

The scale of this landscape is relatively large in terms of landform. Field patterns are fragmented or absent in many areas thereby contributing to an overall large sense of scale. These larger scale landscapes would generally be less sensitive to commercial forestry especially at lower elevations where some existing woodland and commercial forest cover is already present thereby facilitating subtle introduction of commercial forest plantings which would be more readily accommodated.

3.6.2.2 LCT 6. Moorland Hills – Landscape context

The moorland hills is a transition landscape, usually located adjacent and below LCT 5 Moorland Plateau and located adjacent and overlooking LCT 7 Upland Farmland and Foothills. The more elevated parts of this landscape are important in forming the setting of mountain and glen landscapes at higher elevations within LCT 5 Moorland Plateau and LCT 4 Cluffed Uplands and landslips. For this reason, the more elevated areas of this LCT are especially sensitive to commercial forestry which would undermine the rugged character and obstruct views of scenic skylines.



Moorland Hills LCT on the north eastern side of Arroo Mountain overlooked by the more elevated Moorland Plateau LCT.



Outlook towards the mountain skyline of Benbo from the Leitrim Way on the lower slopes of the Boleybrack Mountains.



The Glens of North Leitrim viewed from the Leitrim Way in the Boleybrack Mountains.

3.6.2.3 LCT 6. Moorland Hills – Visual and perceptual criteria

The landscape has a sense of remoteness and wildness at higher elevations in particular and form part of the skyline of the moorland plateau in views which can be of some scenic quality. These more elevated areas are considered to be highly sensitive to commercial forestry.

3.6.2.4 LCT 6. Moorland Hills– Landscape Value

The majority of this LCT is designated apart from isolated areas in the vicinity of Corry Mountain, Crocknagapple, Saddle Hill, the lower slopes of Leean Mountain and the lower slopes of the Tievebaun range. The designations include both AONBs and AHVAs and reflect the scenic quality and outstanding natural beauty of these upland landscapes. They are also the subject of many protected views and prospects in the surrounding lowland landscapes. LCT 6 offers spectacular panoramic views of Benbo and the mountains and glens of North Leitrim from protected view no 17 at O'Donnell's Rock. Two long distance walking routes cross this landscape and three shorter walks are located therein. As a result, LCT 6 is a landscape of considerable value, the scenic quality and recreational value of which would potentially be undermined by commercial forestry.

3.6.2.5 LCT 6. Moorland Hills– Sensitivity ranking

This LCT is considered to be of **high** sensitivity to commercial forestry. A large part of this LCT is covered by proposed AONB and AHVA designations and this is reflective of the landscape and scenic quality and its role as the setting for the upland mountain landscapes. The more elevated parts of this landscape are more sensitive than that at lower elevations due to their remote and wild nature with sensitive moorland landcover and their contribution to scenic skylines enjoyed by viewers.

At lower elevations, in the vicinity of the 200m contour line, this landscape is less sensitive to commercial forestry. The presence of wooded landcover and relative scarcity of strong field patterns as a scale reference is such that commercial forest planting of appropriate scale may be accommodated subject to detailed and careful analysis and design.

3.7 LCT 7. Upland Farmland and Foothills

3.7.1 Baseline

LCT 7 Upland Farmland and Foothills is an extensive landscape of farmland and low hills which form the foreground to LCT 6 Moorland Hills and the mountain ranges as follows:

- Tievebaun and Truskmore;
- Arroo and adjacent mountains;
- Dough Mountain;
- Thur Mountain;
- LEEAN Mountain range (Doons and Crockauns);
- Benbo;
- The Boleybrack Mountains;
- Corry Mountain; and
- Slieve Anierin.

3.7.1.1 LCT 7. Upland Farmland and Foothills – Landscape Character Description

The ‘Leitrim Landscape Character Assessment Review’ described LCT 7 Upland Farmland and Foothills as follows.

‘This Upland Farmland and Foothills is located generally between 100 and 200m AOD and comprises a transitional landscape between the Moorland Hills and the more intensively farmed lowlands. This transitional landscape usually occupies the sides of the long U-shaped valleys that lie between the mountain uplands. Landform is diverse, ranging from gentle sloping foothills to steeper hillsides. Pastures are grazed within a patchwork of hedged fields which stretch up the hillsides often within distinctive linear formations. This hedgerow field pattern tends to become weaker with increasing elevation. Tree cover is sporadic. Plantation coniferous forests are located on many slopes, replacing marginal pastures. Many streams draining the hillsides cut narrow valleys which are often colonised by scrub and trees. Waterfalls are found where the streams cross harder layers of geology. Road routes extend along the length of the valley sides and afford views of opposite sides of valleys and mountain tops. A sparse network of minor, narrow roads wind through the hills extending from these routes. A higher proportion of settlement is located in these farmed areas when compared to the upper slopes of the Moorland Hills. Isolated farmhouses are often located at the end of long winding lanes.’

3.7.1.2 LCT 7. Upland Farmland and Foothills – Designated landscapes, views and prospects

The ‘Leitrim Review of Landscape Designations’ report reflects the value of particular landscapes in County Leitrim and are recognised as such in the draft County Development Plan. The designations that occur within this LCT are tabulated below.

Table 3-18: LCT 7. Designated Landscapes

MAP ID	Designated Landscapes
A2	Lough Melvin AONB – part of this LCT along the southern shoreline of Lough Melvin occurs within this designated landscape
A3	Mountains and Glens of North Leitrim AONB - applies to part of this LCT in the vicinity of Kings Mountain and Arroo Mountain
A4	Lough Gill, LEEAN Mountain and Environs AONB – applies to a part of this LCT on lower slopes of The Doons and Crockauns
A5	Benbo AONB – applies to part of this LCT along the lower slopes of Benbo
A6	The Boleybrack Mountains AONB – applies part of the LCT on the lower slopes of the Boleybrack Mountains

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A7	Lough Allen AONB – applies to part of the LCT on the east side of Lough Allen
A8	Slieve Anierin and Bencroy AONB - applies to part of the LCT within the lower slopes of the Slieve Anierin Mountain range
B3	Dough Mountain AHVA – applies a small part of this LCT
B4	Thur Mountain AHVA – applies to a small part of this LCT

The 'Leitrim Review of Views and Prospects' report is also recognised in the draft County Development Plan. Those that occur within this landscape are tabulated below.

Table 3-19: LCT 7. Views and Prospects

MAP ID	Views and Prospects
V3	View towards Lough Melvin and Donegal Bay
V4	View of Lough Melvin from Aghavoghil
V5	View of Lough Melvin
V27	View towards Eagle's Rock

3.7.1.3 LCT 7. Upland Farmland and Foothills – Promoted walking routes and heritage attractions

Other indicators of landscape value are the promoted walking routes and heritage attractions where landscape is an important part of the experience. These are tabulated below.

Table 3-20: LCT 7. Walking Routes and Heritage Attractions

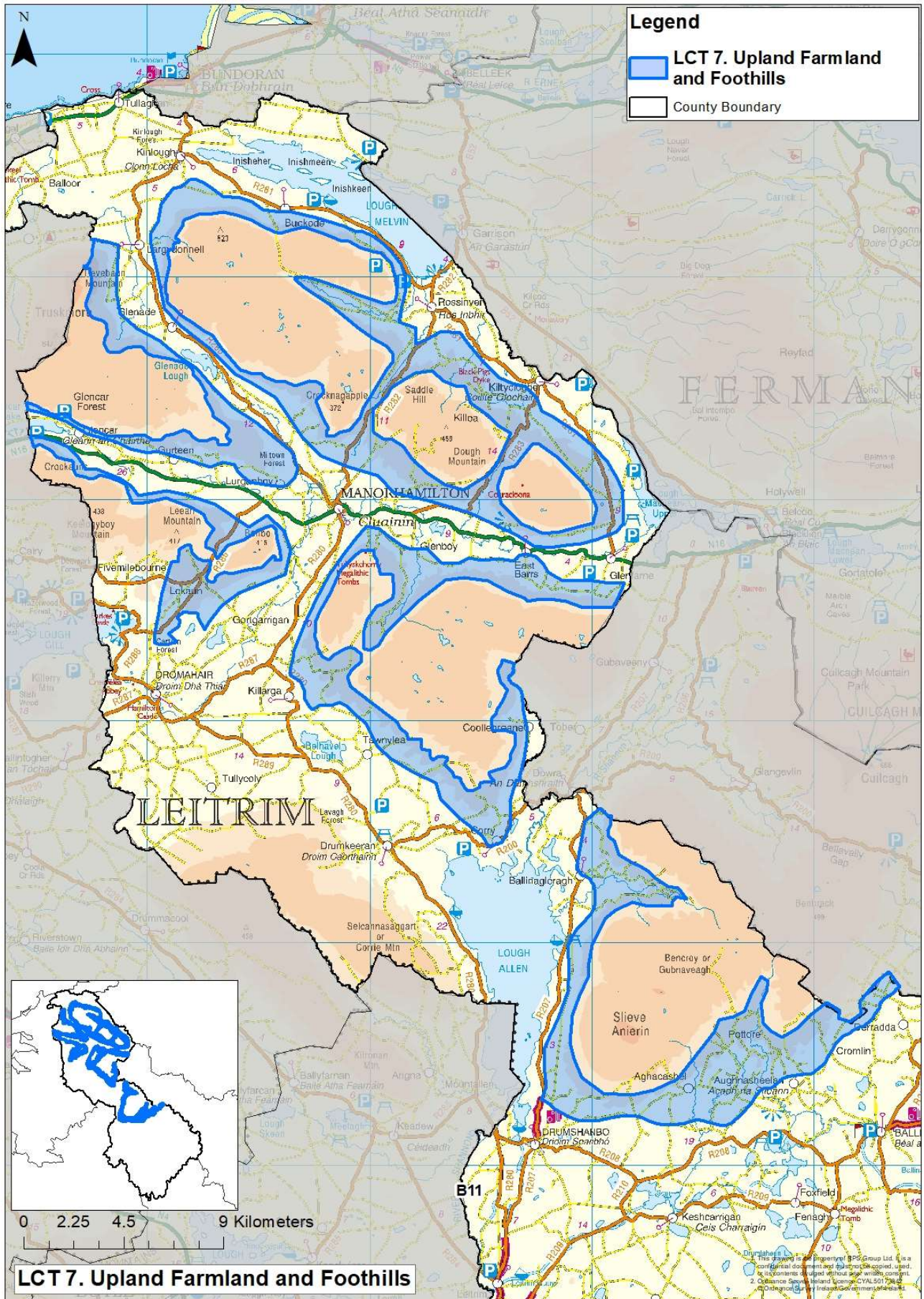
MAP ID	Walking Route / Heritage Attraction
T6	Milltown Wood Forest Walk extends through this LCT at the eastern side of Truskmore
T9	The Miner's Way long distance walking route extends through this LCT in the Boleybrack Mountains
T10	The Leitrim Way long distance walking route extends through this LCT on the southern side of Slieve Anierin
T11	Glencar Hill Walk is a looped linear trail which extends through this LCT at the southern side of Truskmore and overlooking Glencar Lough
T12	The Arroo Trail is located within this LCT on the northern side of Arroo Mountain
T13	Tullylacken Loop Walk extends through this LCT on the eastern side of Bencroy
T15	Crummy Loop Walk extends through this LCT on the southern side of Slieve Anierin

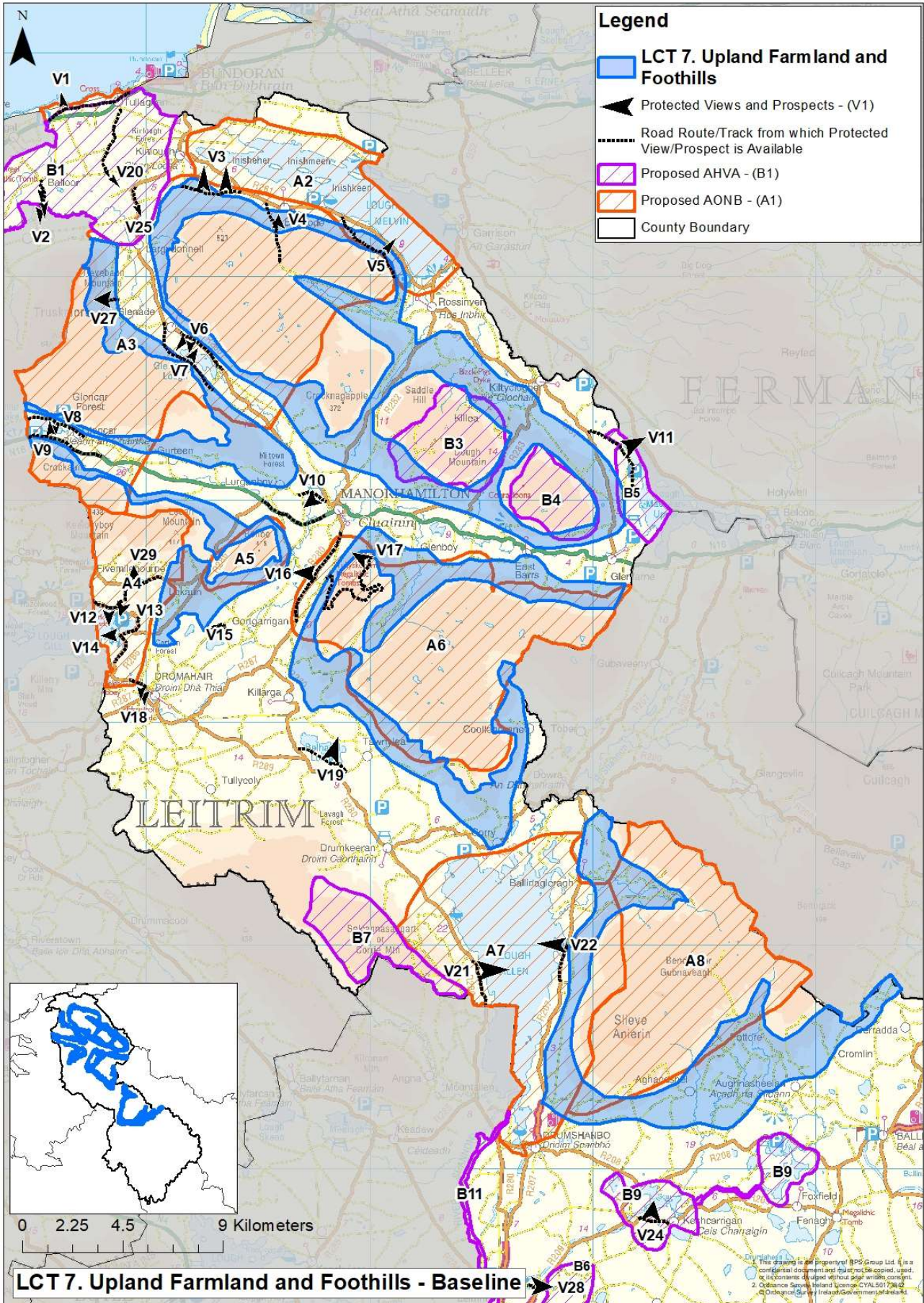
3.7.1.4 LCT 7. Upland Farmland and Foothills – Existing commercial forestry

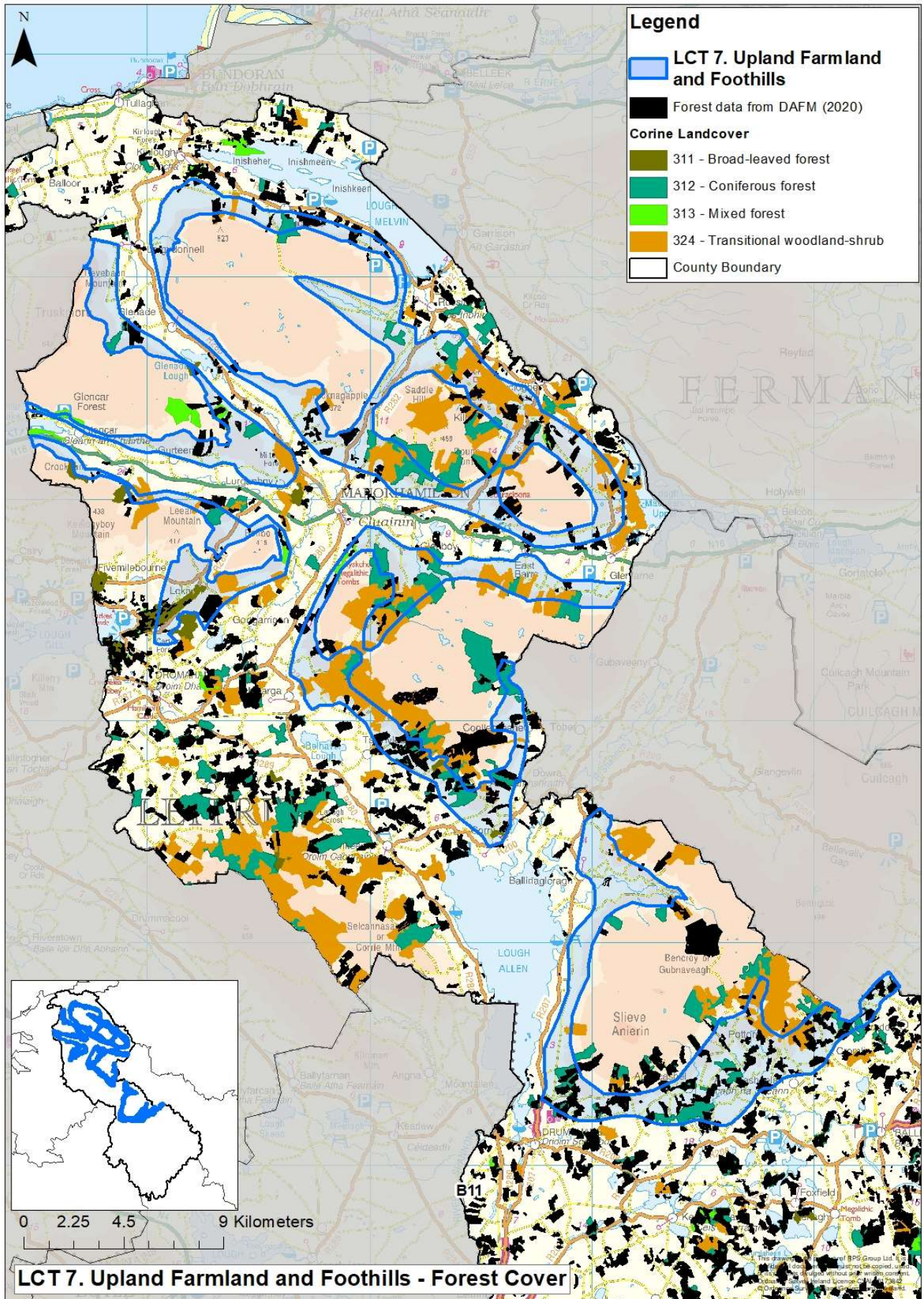
The Corine landcover data along with the available data from DAFM indicate areas of existing commercial forestry dispersed throughout this landscape. Larger scale plantations are more extensive in the eastern part of this landscape in the foothills of Dough Mountain, the Boleybrack Mountains, Slieve Anierin and Bencroy. Plantings are scarce in the Glenade and Glencar valleys to the north west.

3.7.1.5 Baseline Maps

The baseline for this LCT is illustrated in the following three map figures. A detailed location map is presented and this is followed by a baseline map indicating the location of proposed landscape designations, protected views and prospects. Finally, a map which presents the baseline woody vegetation cover and commercial forest cover is also presented.







3.7.2 LCT 7. Upland Farmland and Foothills – Assessment of Sensitivity to Commercial Forestry

The assessment of the sensitivity of LCT 7 Upland Farmland and Foothills to commercial forestry is presented below and takes account of natural criteria (including landform, landcover, scale and landscape context), visual and perceptual criteria and indicators of landscape value such as presence of designations, protected views and promoted walking routes and heritage attractions. The presence and extent of existing commercial forestry plantations is also considered in the sensitivity assessment.

3.7.2.1 LCT 7. Upland Farmland and Foothills – Landform, landcover and scale

This is a gently undulating farmed landscape which features woodlands, hedgerows and frequent tracts of commercial forestry. The wooded and hedgerow cover results in an enclosed landscape which is of lower sensitivity to commercial forestry. It is noted however that existing commercial forestry has in some cases, replaced the original pastoral farmed landscape character. Areas of this landscape would therefore be quite sensitive to further commercial forestry planting where this would result in widespread replacement of the characteristic pastoral farmland landcover and the strong pattern of same defined by hedgerows.

Commercial forestry is present as a large scale element on the southern sides of Dough Mountain and the southern side of Slieve Anierin and Bencroy where it has replaced former farmed field patterns which would have been a key characteristic of this landscape. The extensive forest cover is in conflict with the underlying landscape character and field pattern in this LCA. These areas would be sensitive to further planting which would undermine the key characteristics of this landscape.

3.7.2.2 LCT 7. Upland Farmland and Foothills – Landscape context

This landscape is a transition landscape located adjacent and below the Moorland Plateau (LCT 5) and Moorland Hills (LCT 6) and adjacent and overlooking the valley farmland (LCT 8) at lower elevations. Areas of this landscape form the setting of more elevated mountain moorland landscapes and these areas would be more sensitive to commercial forestry.



The Boleybrack Mountains captured in views south from the R281 Regional Road near the townland of Ardmoneen. The transition between LCT 7 and adjacent landscapes is captured in this view.

3.7.2.3 LCT 7. Upland Farmland and Foothills – Visual and perceptual criteria

This is an active working landscape and not necessarily exceptionally tranquil. A sense of wilderness is not generally experienced. This landscape however forms the foreground to skylines of mountain tops experienced in many views and this aspect of the landscape results in some level of sensitivity to commercial forestry.

3.7.2.4 LCT 7. Upland Farmland and Foothills – Landscape Value

Parts of the landscape within LCT 7 Upland Farmland and Foothills is designated as AONB and AHVA. The designations generally apply to the areas of the landscape which have strong visual links with scenic elements associated with upland mountain areas and also around lakes such as Lough Allen. The designations reflect the scenic quality and outstanding natural beauty of these particular areas which would be especially sensitive to commercial forestry. A total of 4 protected views occur within the LCT and these are generally focussed on Lough Melvin and Eagles Rock. Parts of this LCT provide the foreground to protected views of the lake and cliff features and would be especially sensitive to commercial forestry. Areas within LCT 7 are highly valued as reflected in their designation and assets of recreational value of which would be easily undermined by commercial forestry.

3.7.2.5 LCT 7. Upland Farmland and Foothills – Sensitivity ranking

This LCT is considered to be of **medium to high** sensitivity to commercial forestry. A large part of this LCT falls within proposed AONB and proposed AHVA designations and this is reflective of its importance as the setting of the upland areas and mountains. The landscape in its own right is sensitive to further commercial forestry where implemented at a scale that would further erode the farmed landscape pattern. In this regard, there would be limited capacity for further planting in the foothills of Dough Mountain, the Boleybrack Mountains, Slieve Anierin and Bencroy as the underlying key characteristics such as field patterns would be eroded to the extent that the character type would change to commercial forest. which could, in addition to that existing, undermine the character of these hillsides. The Glenade and Glencar valleys to the north west

would be highly sensitive to commercial forestry due to their importance as the setting or foreground to the elevated and highly scenic mountain landscapes.

3.8 LCT 8. Valley Farmland

3.8.1 Baseline

LCT 8 Valley Farmland is an extensive landscape comprised of glacial u shaped valleys that extend between the various mountain ranges in north Leitrim and along the western side of Lough Allen.

3.8.1.1 LCT 8. Valley Farmland – Landscape Character Description

The ‘Leitrim Landscape Character Assessment Review’ described LCT 8 Valley Farmland as follows.

‘This LCT occupies the valley floor of the U-shaped glacial valleys associated with the glens in the northern half of the county. The local topography of the valley floor comprises drumlin hills although in some cases, the valley floor presents as a series of glacially formed terraces such as that associated with the Glenaniff River. Land cover comprises pastoral farmed with a strong field pattern defined by mature hedgerows. A small number of medium to large elongated lakes feature in these valleys. Occasional waterfalls empty into the valleys from the upland landscapes. Road routes, including regional roads extend along the length of the valleys linking towns and settlements. Open views towards dramatic mountain skylines are frequently available.’

3.8.1.2 LCT 8. Valley Farmland – Designated landscapes, views and prospects

The ‘Leitrim Review of Landscape Designations’ report reflects the value of particular landscapes in County Leitrim and are recognised as such in the draft County Development Plan. The designations that occur within this LCT are tabulated below.

Table 3-21: LCT 8. Designated Landscapes

MAP ID	Designated Landscapes
A3	Mountains and Glens of North Leitrim AONB – applies to this LCT in the north of the county
A6	A6 – The Boleybrack Mountains AONB – applies to this LCT in the vicinity of the Boleybrack Mountains
A7	A7 – Lough Allen AONB – applies to this LCT in the vicinity of Lough Allen

The ‘Leitrim Review of Views and Prospects’ report is also recognised in the draft County Development Plan. Those that occur within this landscape are tabulated below.

Table 3-22: LCT 8. Views and Prospects

MAP ID	Views and Prospects
V6	View towards Glenade Lake and Valley
V7	View towards Glenade Lake and Valley
V8	View towards Glencar Lake
V9	View towards Glencar Lake from N16 Road
V10	View towards Benbo Mountain from the outskirts of Manorhamilton
V11	View towards Lough Macnean Upper
V15	View towards Carrigeencor Lough
V16	View of Benbo and Dough Mountain from the R280 Regional Road
V18	View of Creevelea Abbey from Friarstown

3.8.1.3 LCT 8. Valley Farmland – Promoted walking routes and heritage attractions

Other indicators of landscape value are the promoted walking routes and heritage attractions where landscape is an important part of the experience. These are tabulated below.

Table 3-23: LCT 8. Walking Routes and Heritage Attractions

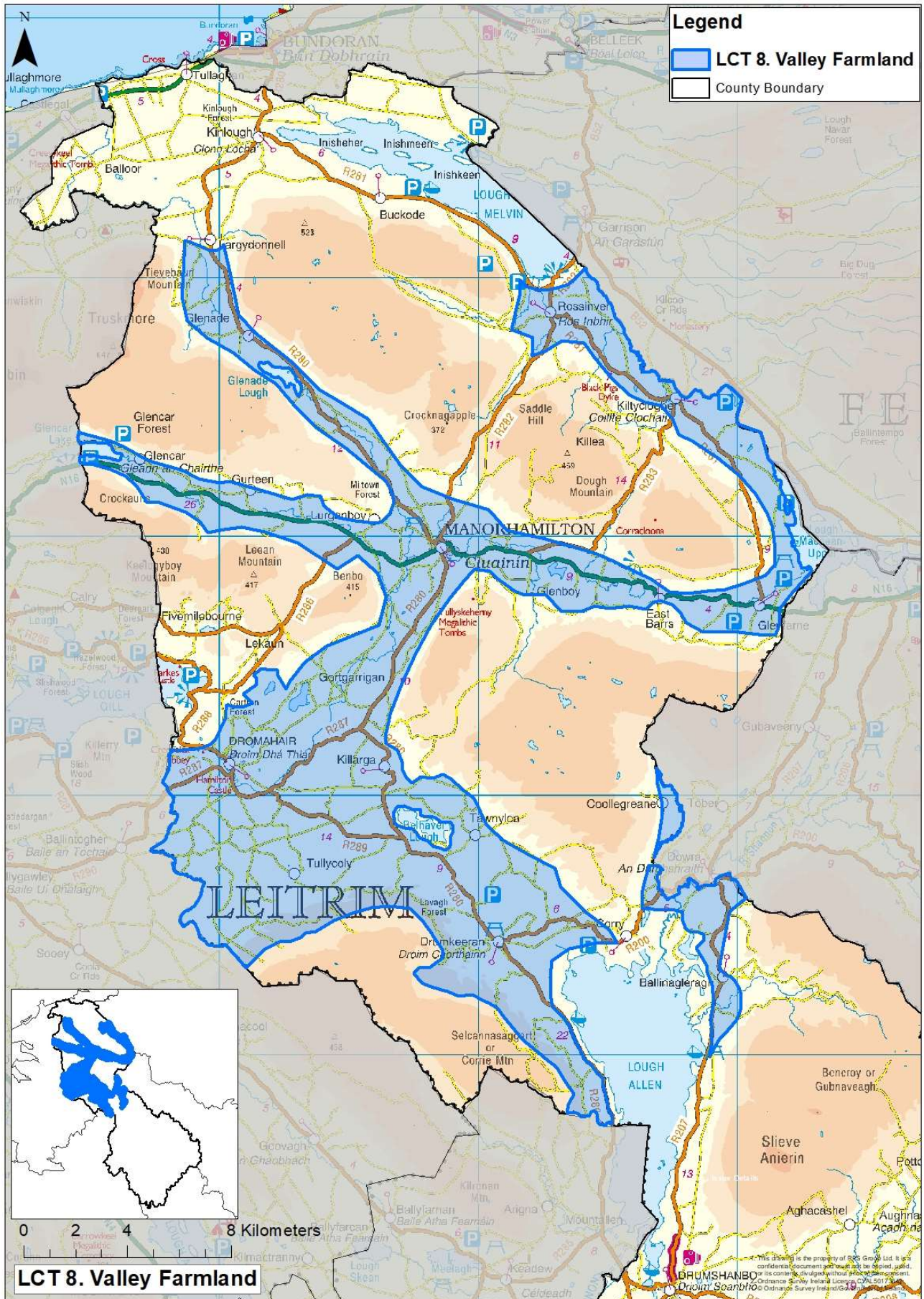
MAP ID	Walking Route / Heritage Attraction
T6	Milltown Wood Forest Walk is located in this LCT near Manorhamilton along with Manorhamilton Heritage Trail
T8	Glenfarne Forest Woods Walk is located within this LCT in Glenfarne, south of Thur Mountain
T9	The Miner’s Way long distance walking route extends through this LCT in between Corry Mountain and Slieve Anierin
T10	The Leitrim Way long distance walking route extends through this LCT on the eastern side of Lough Allen and near Manorhamilton
T16 & 17	The SNLCR Greenway extends through this landscape near Glenfarne and Dromahair
H2	Manorhamilton Castle is a heritage attraction in the town of Manorhamilton
H7	The Sean Mac Diarmada Homestead is a heritage attraction near Kiltyclogher
H17	Creevelea Abbey is promoted as a heritage attraction located in this LCT west of Dromahair

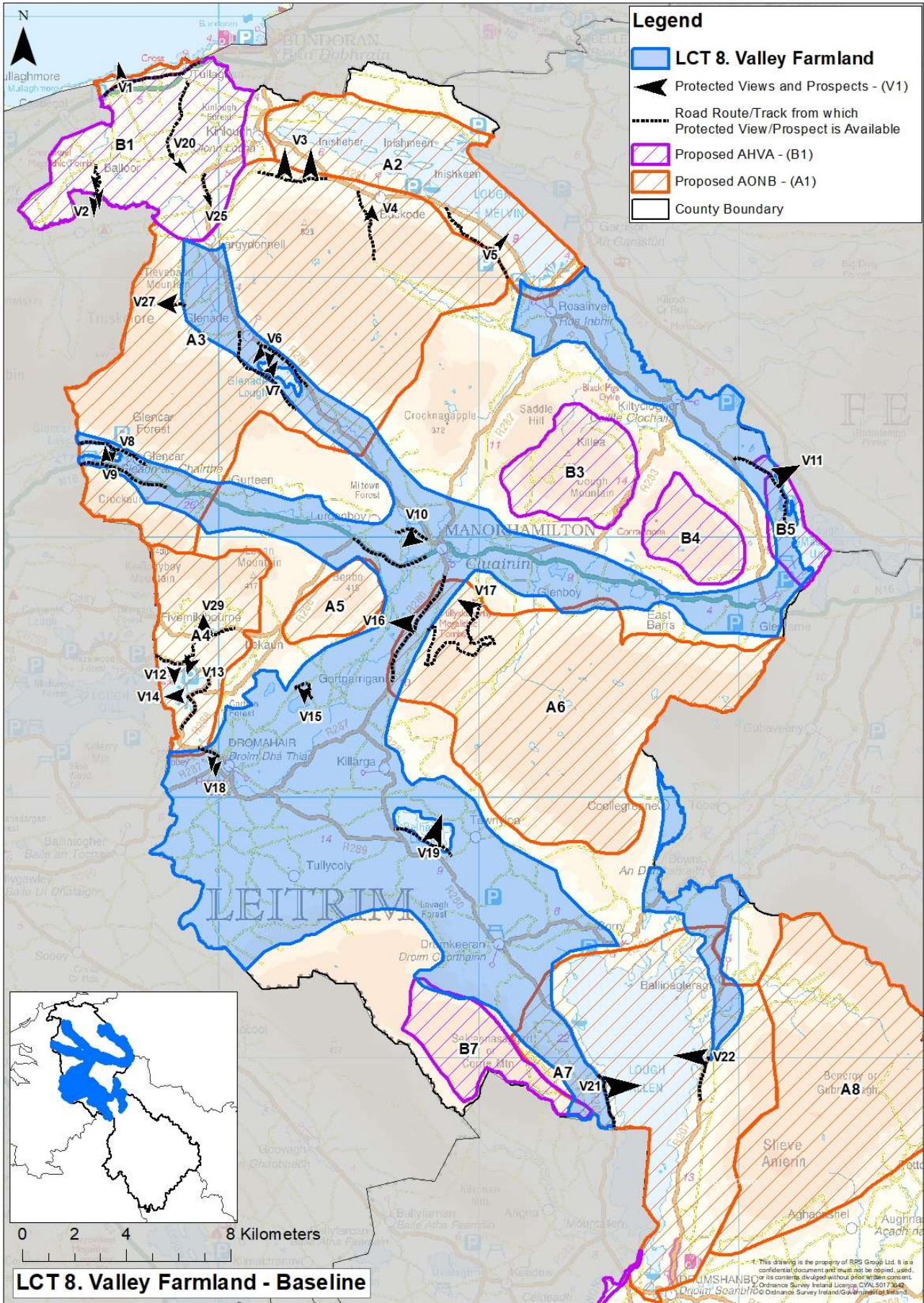
3.8.1.4 LCT 8. Valley Farmland – Existing commercial forestry

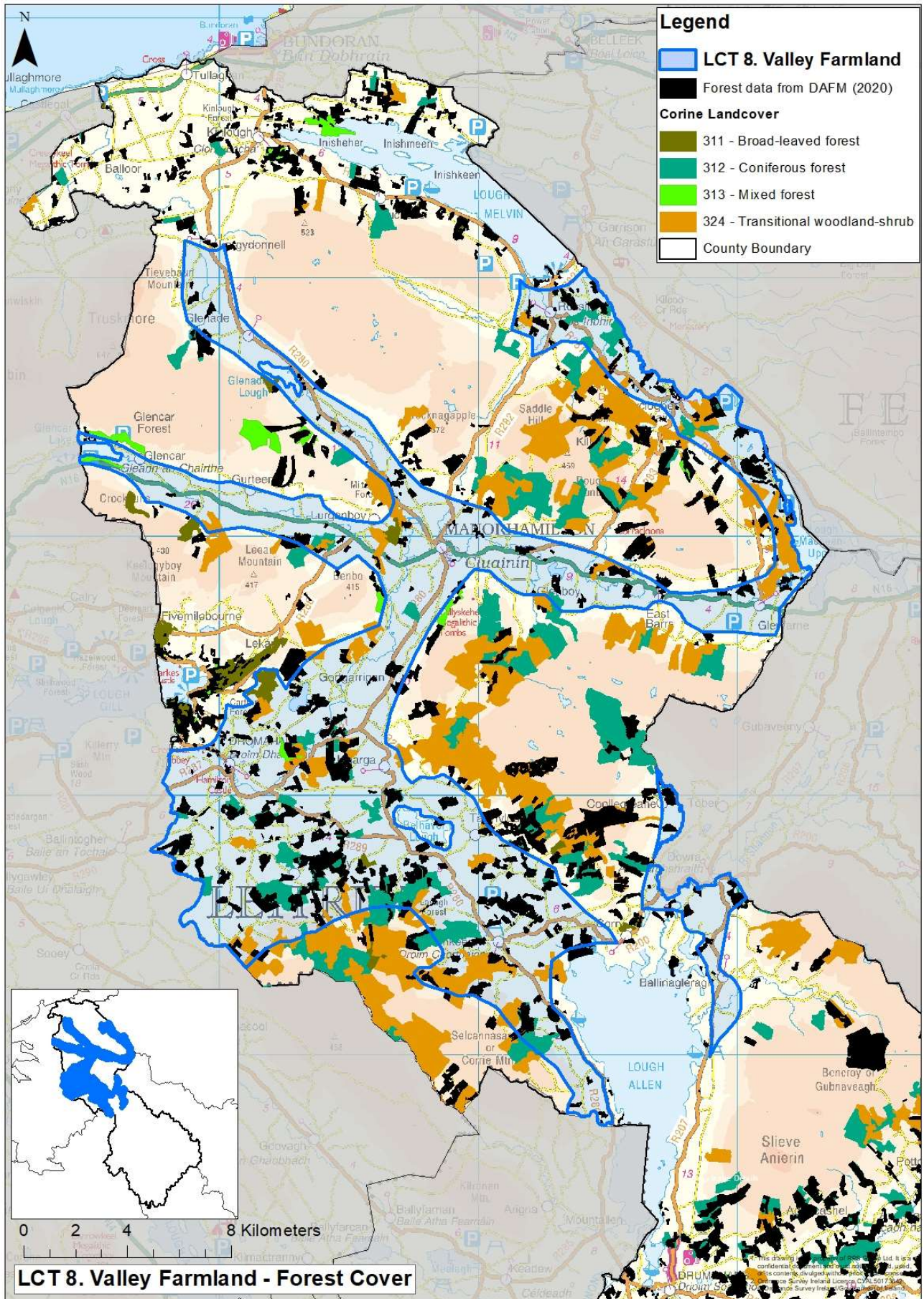
The Corine landcover data on coniferous forestry along with the available data from DAFM indicate existing commercial forestry plantations of varying scale and size throughout this LCT apart from the valleys Glenade and Glencar where planting is scarce. Larger scale areas of planting are located in the valley farmland west and south of the Boleybrack Mountains.

3.8.1.5 Baseline Maps

The baseline for this LCT is illustrated in the following three map figures. A detailed location map is presented and this is followed by a baseline map indicating the location of proposed landscape designations, protected views and prospects. Finally, a map which presents the baseline woody vegetation cover and commercial forest cover is also presented.







3.8.2 LCT 8. Valley Farmland – Assessment of Sensitivity to Commercial Forestry

The assessment of the sensitivity of LCT 8 Valley Farmland to commercial forestry is presented below and takes account of natural criteria (including landform, landcover, scale and landscape context), visual and perceptual criteria and indicators of landscape value such as presence of designations, protected views and promoted walking routes and heritage attractions. The presence and extent of existing commercial forestry plantations is also considered in the sensitivity assessment.

3.8.2.1 LCT 8. Valley Farmland – Landform, landcover and scale

The undulating hill topography combined with mature hedgerows and woody vegetation results in an enclosed landscape which is generally of lower sensitivity. There are areas where the field pattern is small in scale and strongly defined by hedgerows resulting in a clearly legible field pattern along the lower slopes or foothills. Such areas would be more sensitive to commercial forestry which would undermine or erode this field pattern as a key characteristic of this landscape.

3.8.2.2 LCT 8. Valley Farmland – Landscape context

This landscape occupies the valley floor within the u shaped valleys or glens of North Leitrim. Many areas within this landscape are overlooked by the more elevated landscapes including LCT 4 Clifed Uplands and Landslips, LCT 5 Moorland Plateau, LCT 6 Moorland Hills and LCT 7 Upland Farmland and Foothills. This landscape forms the setting for these upland areas which are generally more sensitive to commercial forestry. Care will be needed in the siting and design of commercial forestry plantings so that these do not obstruct scenic views of the mountains, cliffs and valley sides.



The cliffs and the glacial corrie in the vicinity of Truskmore would be highly sensitive to commercial forestry.



Arroo Mountain overlooks the valley farmland LCT in the north.



Outlook north towards the tabular hills from the North West Cycle Trail near Dromahair should be safeguarded from visual intrusion by commercial forestry.

3.8.2.3 LCT 8. Valley Farmland – Visual and perceptual criteria

The valley landscape is a busy working landscape. The active and busy characteristics are derived from farming activities and man made elements such as main road routes which extend along the length of some of these valleys along with overhead powerlines. The busy nature of the landscape results in a lower sensitivity however many areas within this landscape form the setting or foreground to the more elevated mountain skylines and cliffs along with highly scenic lakes. These areas are generally more sensitive.



The distinctive mountain skyline of Benbo as viewed from Manorhamilton.



Glencar Lake with the steep mountain peaks (Doons and Crockauns) in the background.

3.8.2.4 LCT 8. Valley Farmland – Landscape Value

Most of this LCT lies outside the proposed designated AONBs and AHVAs although the outlook from this valley landscape is towards many mountains which are proposed designated areas. As the landscape forms the valley floor to the dramatic u shaped valleys, it plays a very important role in forming the setting of the uplands and mountains and this is recognised in the many protected views and prospects located within. The landscape designations, views and prospects reflects the scenic quality of this LCT and particularly the outlook towards other designated mountain landscapes. This LCT is the valley floor celebrated in tourism literature concerning the glens of North Leitrim and features sites of cultural heritage interest such as

Creevelea Abbey, the setting of which would need to be safeguarded from commercial forestry planting. The value of this LCT is further recognised by the presence of long distance walking routes and tourist attractions.



The siting and design of commercial forestry needs to have regard for the landscape setting of important heritage assets including Creevelea Abbey.

3.8.2.5 LCT 8. Valley Farmland – Sensitivity ranking

This LCT is considered to be of **high** sensitivity to commercial forestry. Part of this LCT falls within proposed AONB designations and a total of 9 proposed views and prospects are dispersed throughout. These aspects reflect the importance of this landscape as a foreground to the skylines of the mountains and setting of lakes many of which are designated. The northern part of this landscape is especially sensitive in areas where it forms an important setting to scenic views of upland mountain landscapes and also in more tranquil areas away from roads.

The southern part of this LCT, in particular that south of Dromahair may have some limited capacity for further commercial forestry planting. This however would be located away from lakes and rivers and would have to be of a scale that is appropriate to the existing farmed field pattern. Opportunities for new planting could be more easily integrated into areas of the landscape that feature deciduous or mixed species woodlands and areas of scrub. Future planting would have to take account of that existing in order to avoid adverse cumulative effects on landscape character.

3.9 LCT 9. Drumlin Farmland

3.9.1 Baseline

LCT 9 Drumlin Farmland occupies an expansive farmed landscape in south County Leitrim.

3.9.1.1 LCT 9. Drumlin Farmland – Landscape Character Description

The ‘Leitrim Landscape Character Assessment Review’ described LCT 9 Drumlin Farmland as follows.

‘The Drumlin Farmland occupies a large part of the southern part of the county and features a distinctive drumlin hill topography. The consistent orientation of the hills gives the landscape a uniform grain and has its origins from the direction of ice flows during glaciation. The pattern or grain can be difficult to appreciate, being masked largely by the abundant mature hedgerows which race up and down the hillsides forming a patchwork pattern usually of small-scale. The drumlins have steep sides with broad rounded tops although their size and shape vary considerably throughout. Land cover is generally pasture with marshy areas within the inter drumlin hollows. Patches of commercial coniferous forestry are dispersed throughout this landscape, some areas being fairly extensive in size. The plantation coniferous forest is a frequent feature and has become influential in the local landscape character.’

3.9.1.2 LCT 9. Drumlin Farmland – Designated landscapes, views and prospects

The ‘Leitrim Review of Landscape Designations’ report reflects the value of particular landscapes in County Leitrim and are recognised as such in the draft County Development Plan. Most of this LCT is undesignated. Small areas of this LCT are designated as tabulated below.

Table 3-24: LCT 9. Designated Landscapes

MAP ID	Designated Landscapes
A7	Lough Allen AONB – applies to a small area on the south eastern side of Lough Allen.
B2	Gulladoo Lake and Environs AHVA – applies to a small area in the vicinity of Gulladoo Lake in the south east of the county
B6	Sheemore AHVA – applies to a small area at the foot of Sheemore Hill
B8	Laheen Lough, Kilnamar Lough and Environs AHVA – applies to small areas around these lakes in the south east of the county.
B9	Lough Scur, St. John’s Lough and Environs AHVA – applies to small areas of landscape in the vicinity of these lakes.
B10	Lough Garadice and Environs AHVA – applies to small areas of this landscape in the vicinity of this lake.
B11	River Shannon and Lakes AHVA – applies to small areas of this landscape near the River Shannon.

The ‘Leitrim Review of Views and Prospects’ report is also recognised in the draft County Development Plan. Those that occur within this LCT are tabulated below.

Table 3-25: LCT 9. Views and Prospects

MAP ID	Views and Prospects
V23	View towards Slieve Anierin and Carrickey Lough
V24	View of Slieve Anierin and Lough Scur from the R209 Regional Road
V28	View towards Sheemore from the outskirts of Leitrim

3.9.1.3 LCT 9. Drumlin Farmland – Promoted walking routes and heritage attractions

Other indicators of landscape value are the promoted walking routes and heritage attractions where landscape is an important part of the experience. These are tabulated below.

Table 3-26: LCT 9. Walking Routes and Heritage Attractions

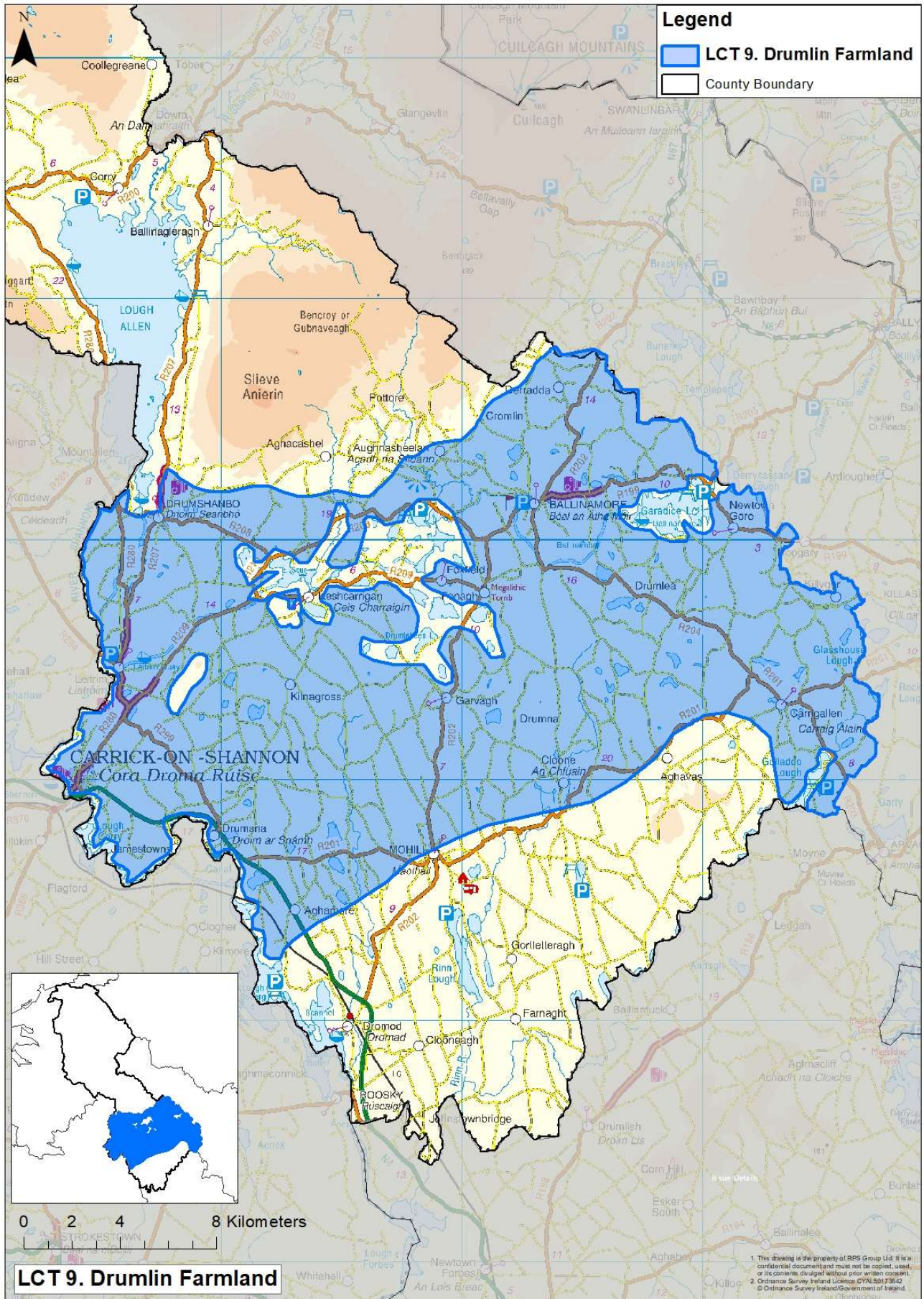
MAP ID	Walking Route / Heritage Attraction
T1	Acres Lake Boardwalk
T18	Bothar na Naomh
H16	Fenagh Abbey

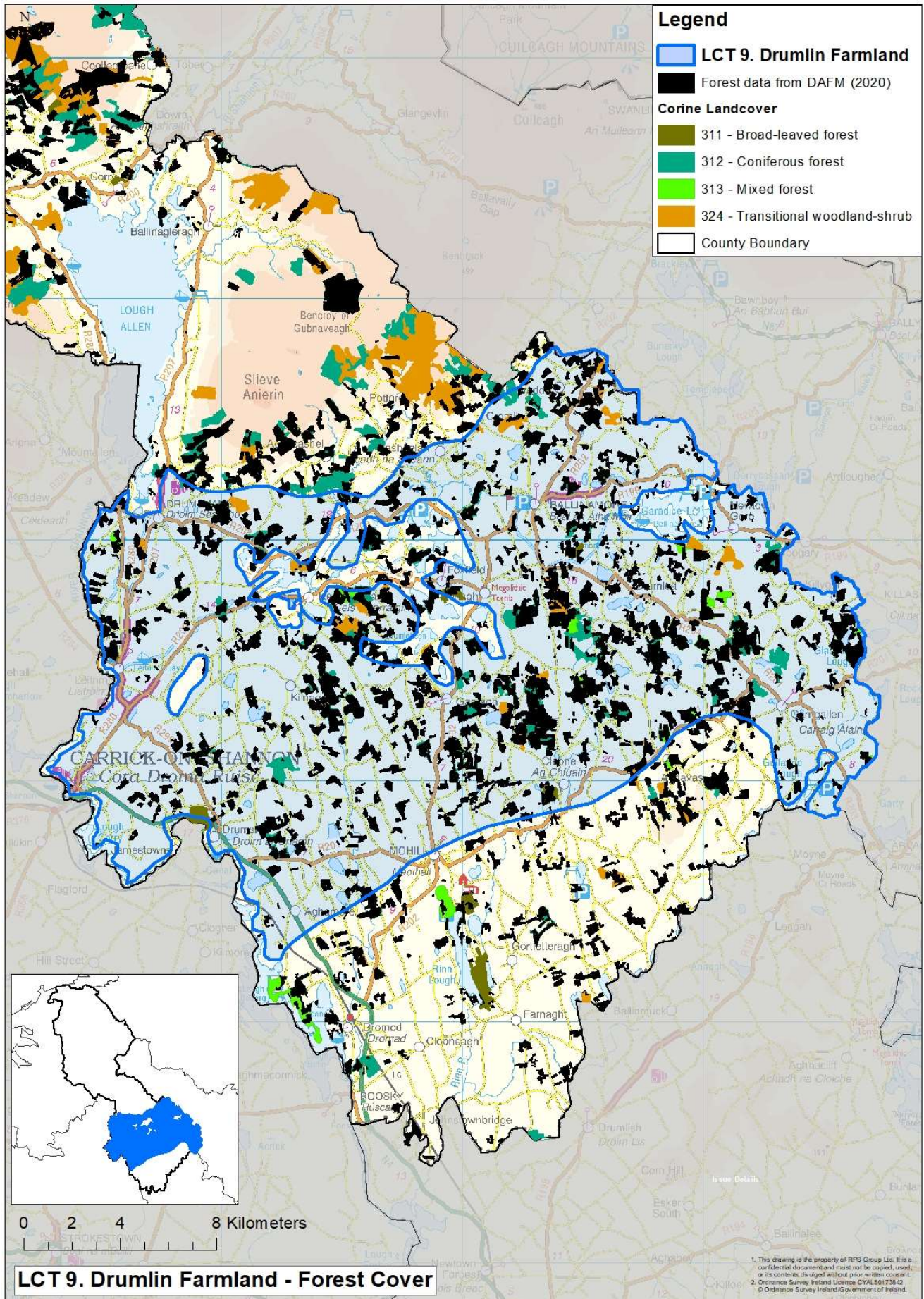
3.9.1.4 LCT 9. Drumlin Farmland – Existing commercial forestry

The Corine landcover data along with the available data from DAFM indicate the presence of commercial forestry plantations of varying size dispersed throughout this LCT. These commercial forestry plantations are relatively abundant throughout.

3.9.1.5 Baseline Maps

The baseline for this LCT is illustrated in the following three map figures. A detailed location map is presented and this is followed by a baseline map indicating the location of proposed landscape designations, protected views and prospects. Finally, a map which presents the baseline woody vegetation cover and commercial forest cover is also presented.





3.9.2 LCT 9. Drumlin Farmland – Assessment of Sensitivity to Commercial Forestry

The assessment of the sensitivity of LCT 9 Drumlin Farmland to commercial forestry is presented below and takes account of natural criteria (including landform, landcover, scale and landscape context), visual and perceptual criteria and indicators of landscape value such as presence of designations, protected views and promoted walking routes and heritage attractions. The presence and extent of existing commercial forestry plantations is also considered in the sensitivity assessment.

3.9.2.1 LCT 9. Drumlin Farmland – Landform, landcover and scale

The topography and landcover in this LCT, comprised of drumlin hills and mature hedgerows results in an enclosed landscape which is of lower sensitivity to commercial forestry. The relative scarcity of distinctive mountain peaks or more complex landforms also results in a lower sensitivity to commercial forestry. Parts of this landscape in the north, however, are within the setting of Slieve Anierin and as a result, these areas would be more sensitive to commercial forestry which would potentially screen or obstruct views of the mountain skyline. There are areas within this landscape where a strong and distinctive pastoral farmland pattern is present and strengthened by the presence of hedgerows. These areas would be more sensitive to commercial forestry which would undermine the scale and pattern in the landscape as key characteristics. The pastoral farmland landcover has and could continue to be eroded by introduction of commercial forestry as a large scale plantation and there is evidence of this in the landscape of today.



Areas of farmland with strongly defined field patterns are more sensitive to commercial forestry.

3.9.2.2 LCT 9. Drumlin Farmland – Landscape context

This landscape comprises an extensive area of the lowlands of South Leitrim. The northern part forms part of the setting or foreground to the mountain landscape further north of Slieve Anierin. Areas of this landscape in the west form the setting of the hill landscapes of Sheemore and Sheebeg. The landscape also serves as a hill farmland context to many of the smaller lakes in South Leitrim along with the River Shannon. Many of these water bodies are designated landscapes (AHVAs). The areas within the setting of Slieve Anierin, Sheemore and Sheebeg and areas that surround the lakes along with margins of the River Shannon are more sensitive to commercial forestry.



Sheemore with Carrickevy Lough in the foreground, south of Leitrim village – areas within the setting of lakes and distinctive hills are highly sensitive to commercial forestry.

3.9.2.3 LCT 9. Drumlin Farmland – Visual and perceptual criteria

The landscape features few distinctive skylines however it does form the setting of the mountains further north including Slieve Anierin. This LCT is also important to the setting of Sheemore as an important hilltop focal point of cultural heritage value and proposed AONB. A sense of wilderness is not apparent in this working farmed landscape however it is rural with little by way of detracting built elements apart. In this regard it is sensitive to further commercial forestry.



Views towards Slieve Anierin are available near Eslinbridge.

3.9.2.4 LCT 9. Drumlin Farmland – Landscape Value

The landscapes associated with the lakes and the River Shannon are designated AHVAs and this reflects the high landscape and scenic quality of these areas. The protected views within this LCT reflect the value of particular features such as lakes and the hilltop at Sheemore. The landscape is valued by recreational walkers on trails and visitors at points of interest. The settlement of Fenagh features the ruins of an old Abbey and graveyard. The small settlement along with the lake is promoted as a point of interest. The settlement and its wider setting would be highly sensitive to commercial forestry.



Ruins of Fenagh Abbey. The settlement and wider setting and lake would be highly sensitive to commercial forestry.

3.9.2.5 LCT 9. Drumlin Farmland – Sensitivity ranking

This LCT is considered to be of **low** sensitivity to commercial forestry. A relatively small proportion of this LCT falls within proposed AONB and AHVA designations and a total of 3 proposed views and prospects are located with the setting of the proposed designated areas. The majority of the LCT is undesignated. The landform and landcover in many areas of this LCT results in an enclosed landscape which has capacity to accommodate further commercial forestry. The extent of existing commercial forestry as referred to in the baseline, needs to be carefully considered in the planning of future forestry to avoid undermining the pastoral landcover and drumlin hills as key characteristics of this LCT. The areas within the vicinity of Sheemore, Slieve Anierin and areas surrounding the lakes and along river margins would be of higher sensitivity to commercial forestry.

3.10 LCT 10. Major Loughs

3.10.1 Baseline

There are 5 occurrences of LCT 10 Major Loughs within County Leitrim. These include:

- Lough Melvin;
- Lough Macnean Upper;
- Glencar Lake;
- Lough Gill; and
- Lough Allen.

3.10.1.1 LCT 10. Major Loughs – Landscape Character Description

The 'Leitrim Landscape Character Assessment Review' described LCT 10 Major Loughs as follows.

'The county features a number of large lakes, of which the largest ones include Lough Allen and Lough Melvin. These are generally located within lowland farmland. Regional roads and long distance footpaths follow closely the shoreline of Lough Allen from which panoramic views of this lake are attained along with the mountain backdrop of Slieve Anierin. The regional road south of Kinlough follows the margins of Lough Melvin from which panoramic views are available. The lakes are expansive featuring marginal wetland vegetation and wooded crannogs remain from ancient settlement.'

3.10.1.2 LCT 10 Major Loughs – Designated landscapes, views and prospects

The 'Leitrim Review of Landscape Designations' report reflects the value of particular landscapes in County Leitrim and are recognised as such in the draft County Development Plan. The entire LCT comprises a series of water bodies which are designated as tabulated below.

Table 3-27: LCT 10. Designated Landscapes

MAP ID	Designated Landscapes
A2	Lough Melvin AONB
A3	Mountains and Glens of North Leitrim AONB - applies to Glencar Lake
A4	Lough Gill, Leean Mountain and Environs AONB – applies to Lough Gill
A7	Lough Allen AONB
B5 -	Lough Macnean Upper and Environs AHVA

The 'Leitrim Review of Views and Prospects' report is also recognised in the draft County Development Plan. Those of relevance to the lakes are tabulated below.

Table 3-28: LCT 10. Views and Prospects

MAP ID	Views and Prospects
V3	View towards Lough Melvin and Donegal Bay
V4	View of Lough Melvin from Aghavoghil
V5	View of Lough Melvin
V8	View towards Glencar Lake
V9	View towards Glencar Lake from N16 Road
V11	View towards Lough Macnean Upper
V12	View of Lough Gill from the R286 Regional Road
V13	View of Lough Gill from Carrickanurroo
V14	View of Lough Gill from the R288
V21	View towards Lough Allen from the R280 - These views are attained against the backdrop of Slieve Anierin

3.10.1.3 LCT 10. Major Loughs – Promoted walking routes and heritage attractions

Other indicators of landscape value are the promoted walking routes and heritage attractions where landscape is an important part of the experience. These are tabulated below.

Table 3-29: LCT 10. Walking Routes and Heritage Attractions

MAP ID	Walking Route / Heritage Attraction
-	The lakes are enjoyed by visitors travelling through the landscapes associated with these water bodies.

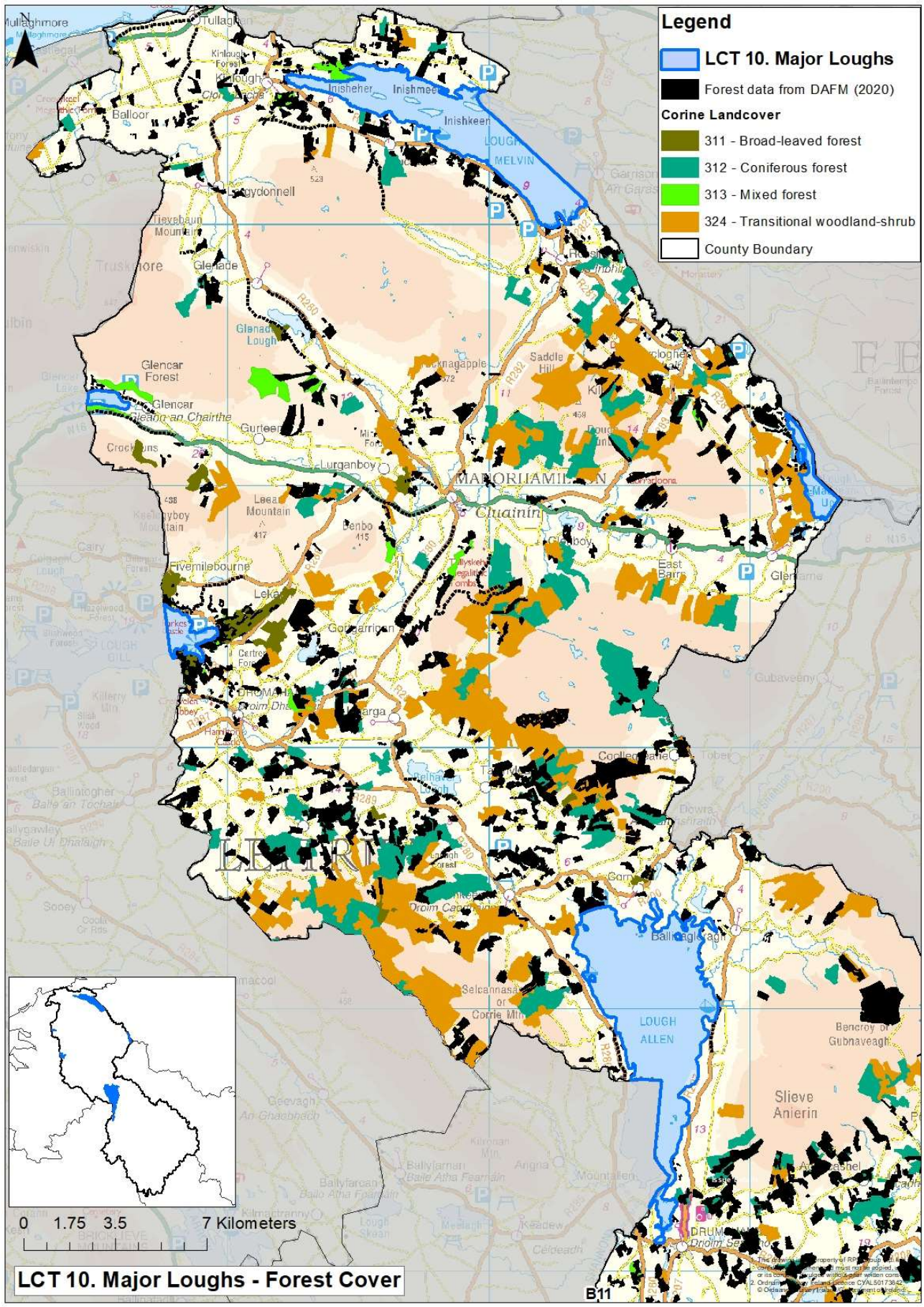
3.10.1.4 LCT 10. Major Loughs – Existing commercial forestry

This LCT relates specifically to the water bodies associated with the lakes where commercial forestry is absent. The presence of commercial forestry in the adjacent LCTs is described under each individual LCT and is of relevance to these LCTs and their connection with the various lakes in County Leitrim.

3.10.1.5 Baseline Maps

The baseline for this LCT is illustrated in the following three map figures. A detailed location map is presented and this is followed by a baseline map indicating the location of proposed landscape designations, protected views and prospects. Finally, a map which presents the baseline woody vegetation cover and commercial forest cover adjacent to these waterbodies is also presented.





3.10.2 LCT 10. Major Loughs - Assessment of Sensitivity to Commercial Forestry

This LCT specifically includes the water bodies associated with Lough Gill, Lough Allen and Lough Melvin which are not directly relevant to the planting of commercial forestry and are excluded from further consideration. The lakes are important landscape features in the context of adjacent LCTs which form the setting and outlook to these water bodies and are considered in terms of sensitivity and the landscape capacity study overall in the context of the adjacent LCTs.

3.11 LCT 11. Drumlin Loughs and Stream Margins

3.11.1 Baseline

There are 6 occurrences of LCT 11 Drumlin Loughs and Stream Margins within County Leitrim. These include farmed landscapes in the vicinity of lakes as follows:

- Belhavel Lake, west of the Boleybrack Mountains;
- Lough Allen;
- A complex of lakes including Lough Scur and St John’s Lough;
- Lough Garadice;
- Lough Rynn; and
- Gulladoo Lough.

3.11.1.1 LCT 11. Drumlin Loughs and Stream Margins – Landscape Character Description

The ‘Leitrim Landscape Character Assessment Review’ described LCT 11 Drumlin Loughs and Stream Margins as follows.

‘This area comprises a gently undulating landscape with low rounded drumlin like hills interspersed with numerous small loughs and crossed by minor streams and ditches (drumlinised ribbed moraine). The loughs and streams are bordered by extensive areas of boggy, poorly drained pastures formed from clays deposited by streams. Areas of common reed, reedmace and bulrush occupy the margins of the loughs. These landscapes are particularly popular for passive recreation and a number of loughs are fringed by car parks and picnic sites. Crannogs occur within the larger loughs. The farmed land cover comprises pasture defined mainly by mature hedgerows but occasionally post and wire fences in lower lying wetter ground. Occasional views towards the mountain landscape of Slieve Anierin to the north are available. Tracts of commercial coniferous forestry are dispersed throughout and are a frequent feature in the landscape.’

3.11.1.2 LCT 11. Drumlin Loughs and Stream Margins – Designated landscapes, views and prospects

The ‘Leitrim Review of Landscape Designations’ report reflects the value of particular landscapes in County Leitrim and are recognised as such in the draft County Development Plan. Almost all of this LCT in the vicinity of Lough Allen falls within a designated AONB and all of this LCT in the vicinity of Lough Garadice falls within a designated AHVA. The relevant designations are tabulated below.

Table 3-30: LCT 11. Designated Landscapes

MAP ID	Designated Landscapes
A7	Lough Allen AONB – applies to nearly all of the LCT around Lough Allen
B9	Lough Scur, St. John’s Lough and Environs AHVA – applies to part of this landscape in the vicinity of these lakes.
B10	Lough Garadice and Environs AHVA – applies to the entire LCT in the vicinity of this lake

The ‘Leitrim Review of Views and Prospects’ report is also recognised in the draft County Development Plan. Those located within this LCT are tabulated below along with V24 located outside this LCT but focused on Lough Scur.

Table 3-31: LCT 11. Views and Prospects

MAP ID	Views and Prospects
V19	View towards Belhavel Lake
V21	View towards Lough Allen from the R280
V22	View of Lough Allen from the R207 Regional Road

V24	View of Slieve Anierin and Lough Scur from the R209 Regional Road
V26	View of Lough Rynn

3.11.1.3 LCT 11. Drumlin Loughs and Stream Margins – Promoted walking routes and heritage attractions

Other indicators of landscape value are the promoted walking routes and heritage attractions where landscape is an important part of the experience. These are tabulated below.

Table 3-32: LCT 11. Walking Routes and Heritage Attractions

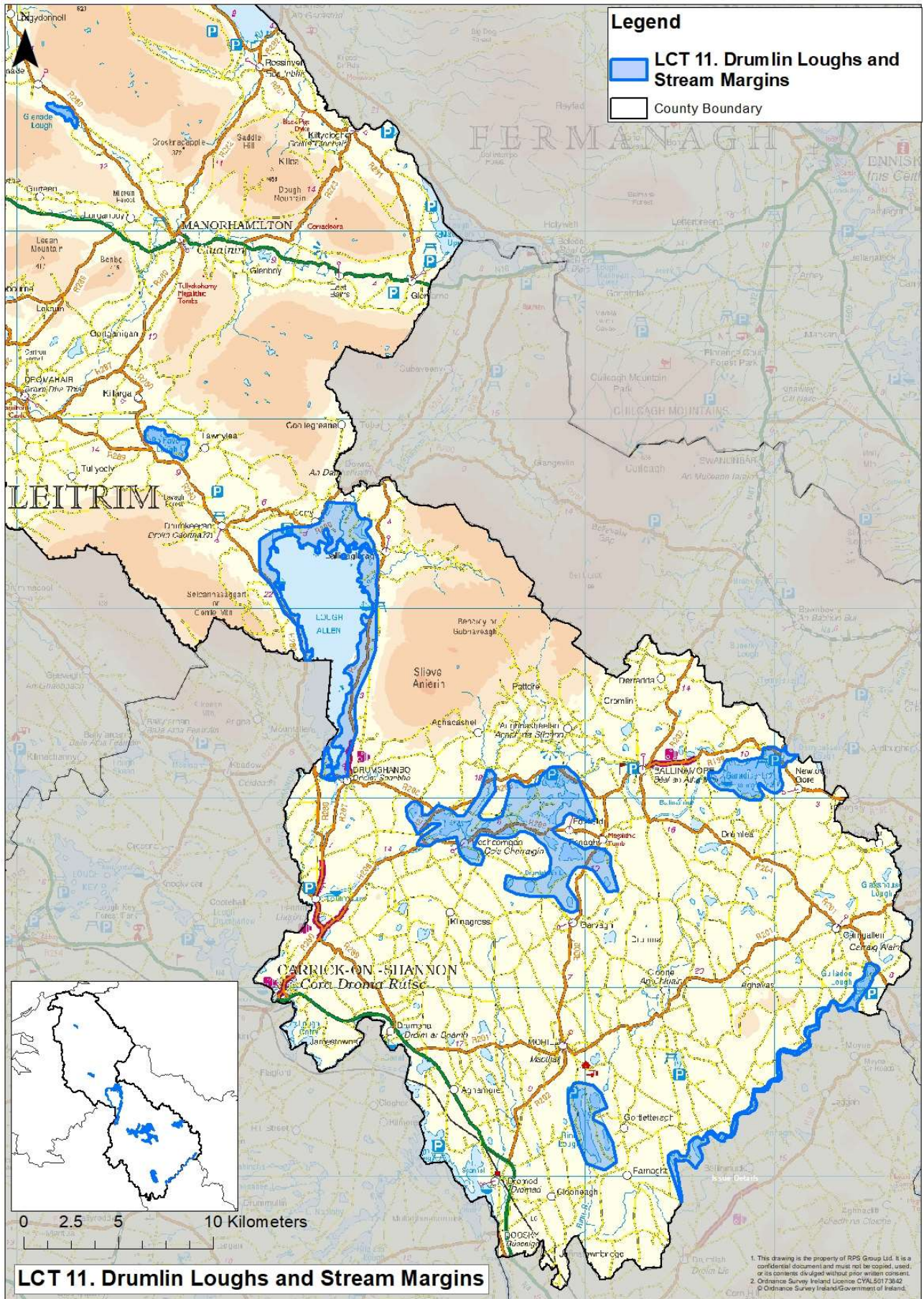
MAP ID	Walking Route / Heritage Attraction
T10	The Leitrim Way long distance walking route extends through this LCT south of Lough Allen
T15	Crummy Loop Walk – in the vicinity of Lough Scur
H4	Farnought Lime Kiln – in the vicinity of Lough Rynn
H16	Fenagh Abbey - in the vicinity of Fenagh Lough

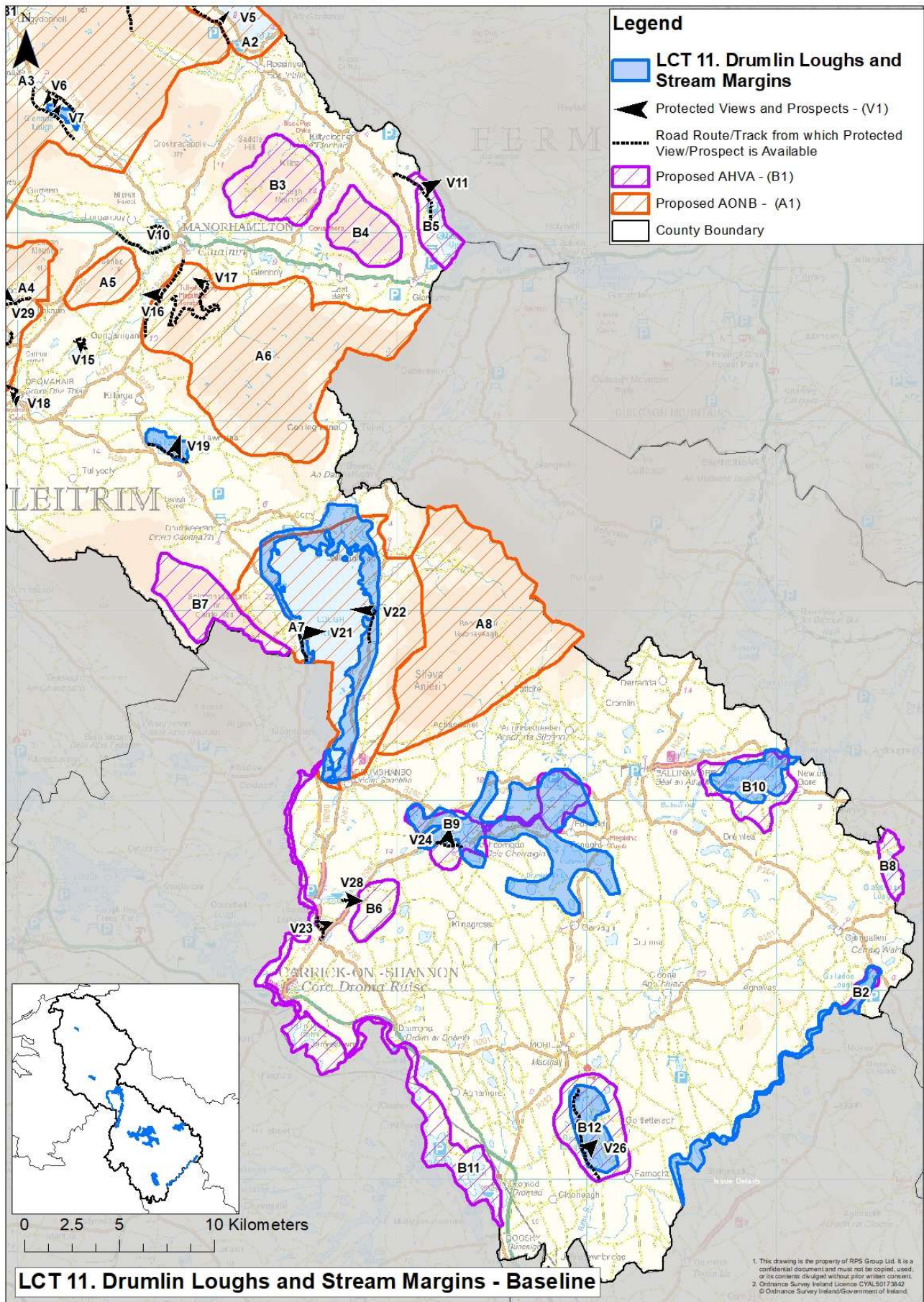
3.11.1.4 LCT 11. Drumlin Loughs and Stream Margins – Existing commercial forestry

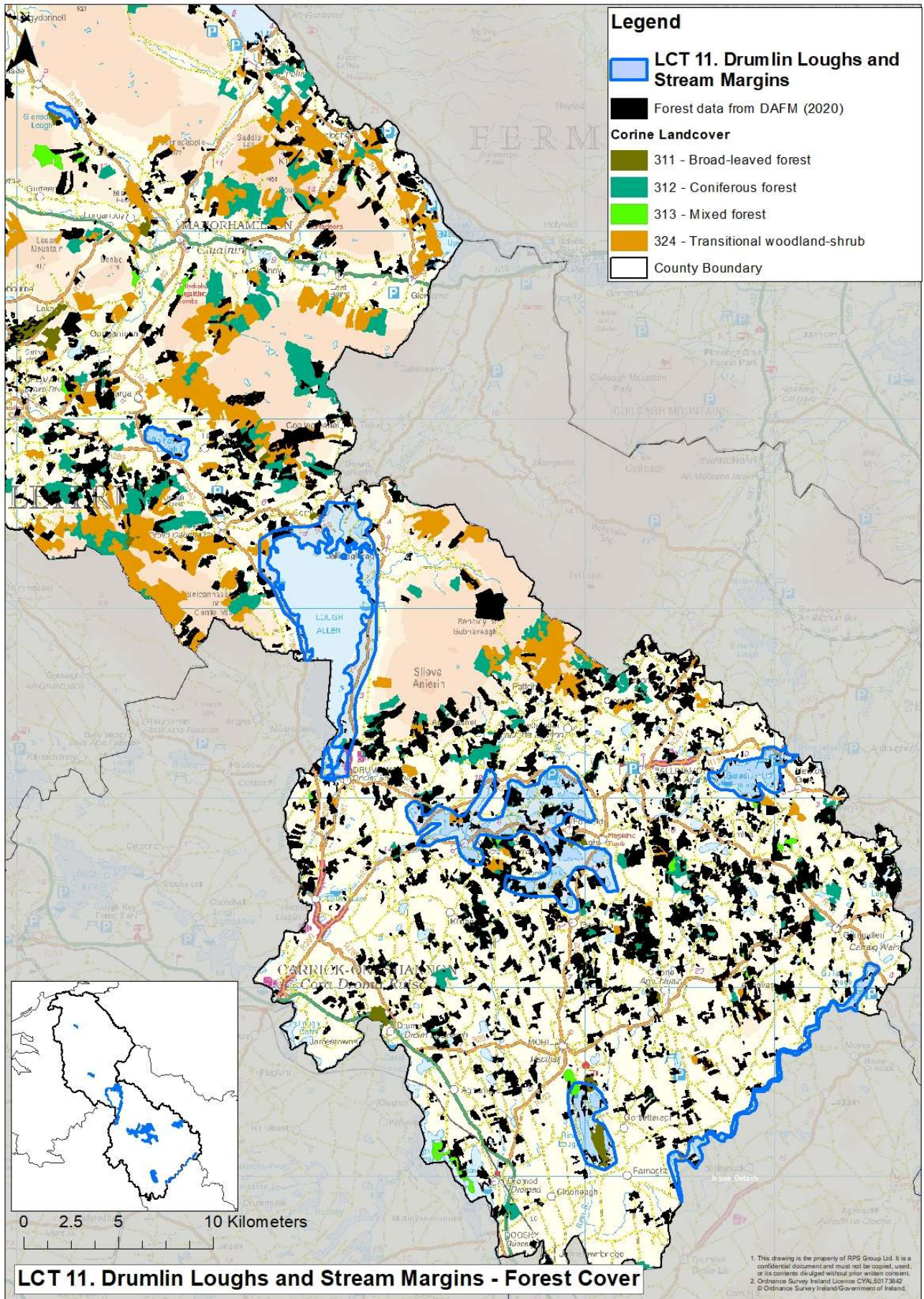
The Corine landcover data along with the available data from DAFM indicate the presence of commercial forestry, mostly in the vicinity of Lough Scur and St John’s Lough. A small number of smaller plantations are located around Lough Rinn, Garadice Lough and Gulladoo Lough. Commercial forestry is sparse in the vicinity of Glenade Lough and Belhavel Lough. Some plantations occur on the northern fringes of Lough Allen.

3.11.1.5 Baseline Maps

The baseline for this LCT is illustrated in the following three map figures. A detailed location map is presented and this is followed by a baseline map indicating the location of proposed landscape designations, protected views and prospects. Finally, a map which presents the baseline woody vegetation cover and commercial forest cover is also presented.







3.11.2 LCT 11. Drumlin Loughs and Stream Margins – Assessment of Sensitivity to Commercial Forestry

The assessment of the sensitivity of LCT 11 to commercial forestry is presented below and takes account of natural criteria (including landform, landcover, scale and landscape context), visual and perceptual criteria and indicators of landscape value such as presence of designations, protected views and promoted walking routes and heritage attractions. The presence and extent of existing commercial forestry plantations is also considered in the sensitivity assessment.

3.11.2.1 LCT 11. Drumlin Loughs and Stream Margins – Landform, landcover and scale

The gently undulating landform and wooded landcover are characteristics that are associated with a lower sensitivity to commercial forestry. In regard to this particular LCT, the gently undulating farmland is usually located close to the margins of a lake which would be more sensitive to commercial forestry. The lakes feature undulating margins, with distinctive promontories islands and crannogs. These landforms are complex and are highly sensitive to commercial forestry. Open areas of bog and marsh are also of higher sensitivity to commercial forestry.



Lough Garadice is a proposed designated AHVA for which, further commercial forestry is not recommended in proximity to the lake.



Margins of Lough Sallagh are sensitive to the introduction of additional commercial forestry.

3.11.2.2 LCT 11. Drumlin Loughs and Stream Margins – Landscape context

Areas within this LCT, especially in the vicinity of Belhavel Lake and Lough Allen are visually connected with nearby mountain landscapes. Belhavel Lake is within the setting of The Boleybrack Mountains and Lough

Allen is located in between Corry Mountain and Slieve Anierin. The margins of these lakes would be more sensitive to commercial forestry which might obscure the mountain back drop of these lakeland landscapes.



Lough Allen and the mountain skyline of Slieve Anierin.



Belhavel Lough, near Killarga and the mountain skyline of the Boleybrack Mountains.



The farmed landscape within B9 Lough Scur, St John’s Lough and Environs AHVA is overlooked by the mountain skyline further north and is highly sensitive to commercial forestry.

3.11.2.3 LCT 11. Drumlin Loughs and Stream Margins – Visual and perceptual criteria

This LCT has a sense of tranquillity away from busy roads resulting in a higher level of sensitivity. This LCT has strong visual links with a number of lakes of varying size including Lough Allen. These present as focal points and, with the surrounding drumlin farmland, are highly scenic and enjoyed by visitors. The setting of the lakes is highly sensitive to commercial forestry.



Gulladoo Lake and surrounding drumlin farmland, enjoyed by visitors, is highly sensitive to commercial forestry

3.11.2.4 LCT 11. Drumlin Loughs and Stream Margins – Landscape Value

The lake margins associated with Lough Allen, Lough Scur and St John’s Lough and Lough Garadice are designated landscapes for the most part. This reflects the landscape and scenic quality of these areas which would be highly sensitive to commercial forestry. All of these lakeland areas are enjoyed by visitors passing through on minor roads as well as users of The Leitrim Way and local walks. Rinn Castle on the shores of Lough Rynn including walled garden is a point of interest albeit currently run as a private hotel.



Rynn Castle and walled garden on the shores of Lough Rynn. The lake margins would be highly sensitive to commercial forestry.

3.11.2.5 LCT 11. Drumlin Loughs and Stream Margins – Sensitivity ranking

This LCT is considered to be of **very high** sensitivity to commercial forestry. The lake margin around Lough Allen is designated as an AONB. AHVA designations apply to the margins of some of the larger lakes. These lake landscapes are the subject of 4 proposed views and prospects. These designations, views and prospects reflect the landscape quality and scenic quality of this LCT. Most of the farmed landscape is in very close proximity to a lake margin and is strongly linked visually to a lake, thereby assuming an important role in the setting of the lake. Further commercial forestry planting would therefore not be recommended in such areas which are in close proximity to the lakes as it would obstruct these scenic features as focal points in the landscape.

3.12 LCT 12. River Floodplain

3.12.1 Baseline

LCT 12 River Floodplain occurs along the River Shannon in the south west of County Leitrim.

3.12.1.1 LCT 12. River Floodplain – Landscape Character Description

The ‘Leitrim Landscape Character Assessment Review’ described LCT 12 River Floodplain as follows.

‘This LCT comprises a flat, low lying pastoral river landscape associated with the Shannon. The river system comprises a number of loughs mostly connected with sluggish river sections. The drainage pattern features small feeder channels which drain the surrounding drumlin swarms and mountains. Water, both in the river channel and loughs, is an important landscape element. The meandering course of the Shannon is bordered by flat floodplains, gently sloping grazed banks, meadows and rough grazing. Landform is typically flat although slight undulations are present. Occasional floodplain trees such as Alder, Ash and Willow stand out as features. Pasture, grazed by cows in drier months, occurs in open fields bordering some stretches of the river. Field boundaries are typically defined by post and wire fences, often colonised by scrub species and ranker growth, giving the appearance of established hedgerows. There is virtually no settlement within this LCT. Roads are also generally absent. A small number of isolated houses do exist, occupying small undulating areas of land to escape flooding. These isolated dwellings tend to be accessed by narrow winding lanes and often enclosed by tall species rich hedgerows.’

3.12.1.2 LCT 12. River Floodplain – Designated landscapes, views and prospects

The ‘Leitrim Review of Landscape Designations’ report reflects the value of particular landscapes in County Leitrim and are recognised as such in the draft County Development Plan. The entire LCT falls within a designated AHVA as tabulated below.

Table 3-33: LCT 12. Designated Landscapes

MAP ID	Designated Landscapes
B11	River Shannon and Lakes AHVA – applies to the entire LCT.

The ‘Leitrim Review of Views and Prospects’ report is also recognised in the draft County Development Plan. None occur within this landscape and none outside this LCT which are focused on particular features within this landscape.

3.12.1.3 LCT 12. River Floodplain – Promoted walking routes and heritage attractions

Other indicators of landscape value are the promoted walking routes and heritage attractions where landscape is an important part of the experience. These are tabulated below. Additionally the River Shannon in Leitrim is well recognised as a recreational asset for water based activity and boating.

Table 3-34: LCT 12. Walking Routes and Heritage Attractions

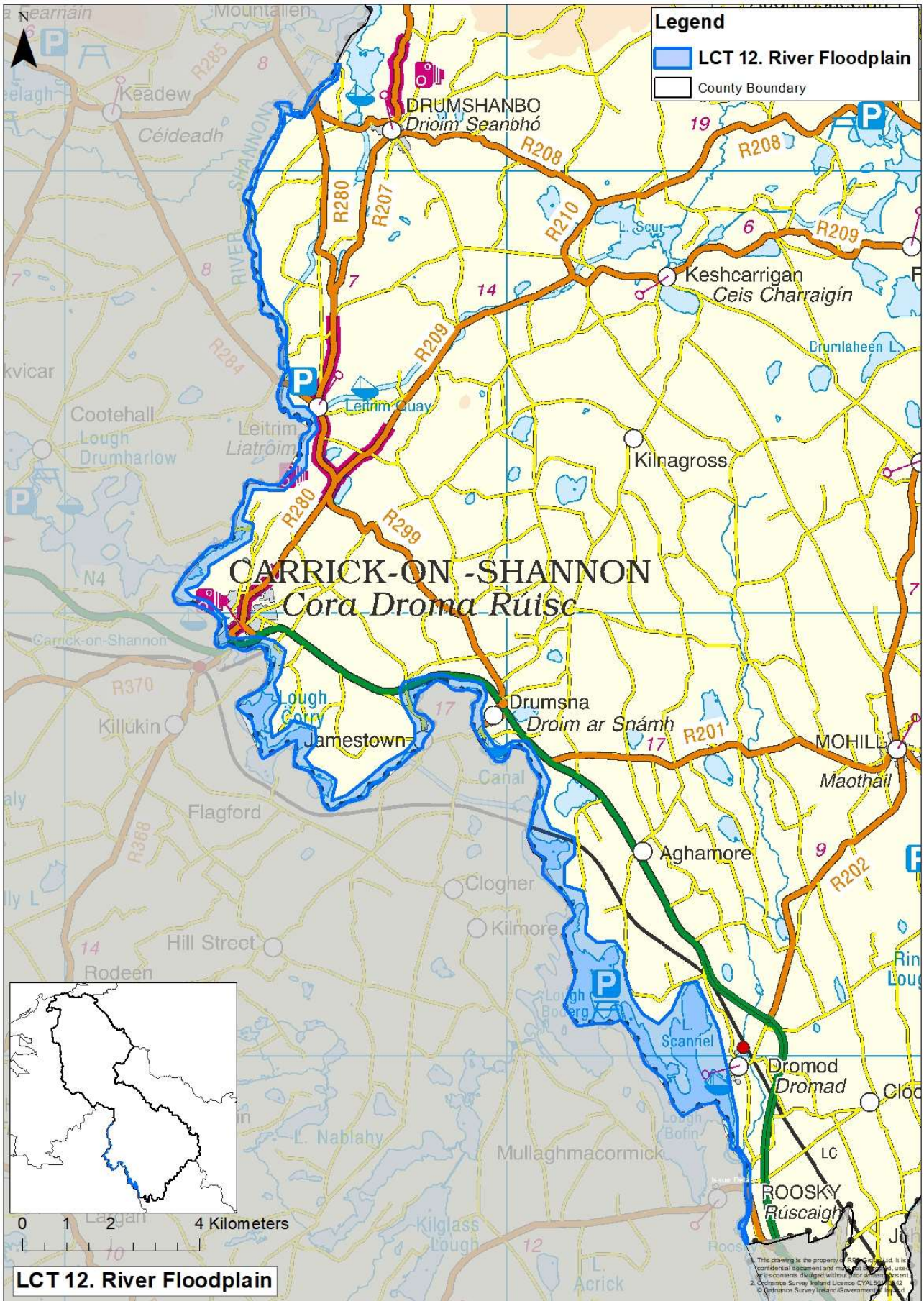
MAP ID	Walking Route / Heritage Attraction
T3	Drumhaver Bridge Loop Walk – near Battlebridge, west of Leitrim Village
T4	Drumleague Lock Loop Walk – near Battlebridge, west of Leitrim Village
T7	Derrycarne Wood, Lough Boderg Trail
T19	Anthony Trollope Trail – near Drumsna
T21	Walk through Carrick On Shannon
H3	Costello Chapel
H5	St George’s Heritage and Visitor Centre
H15	Jamestown Abbey

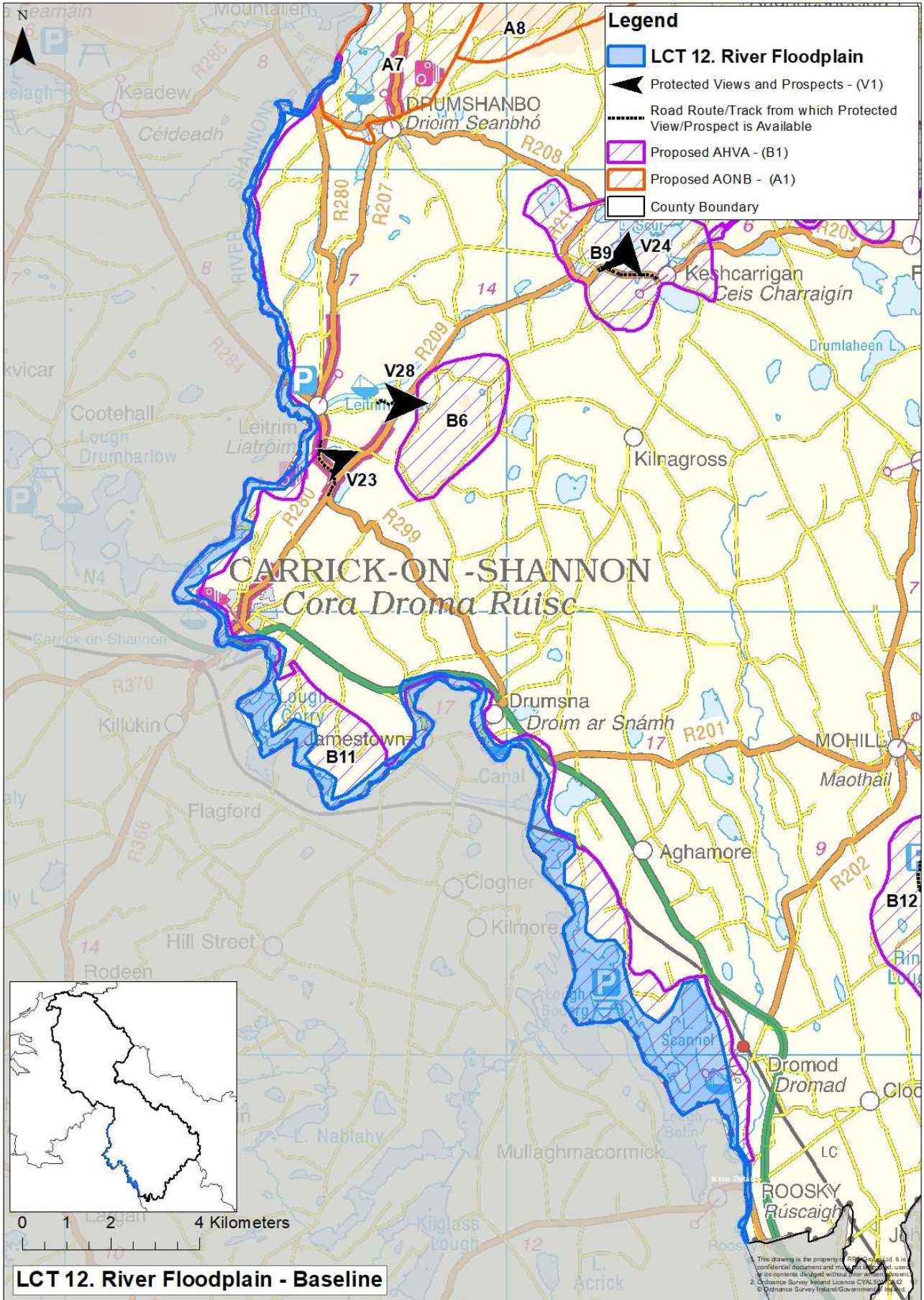
3.12.1.4 LCT 12. River Floodplain – Existing commercial forestry

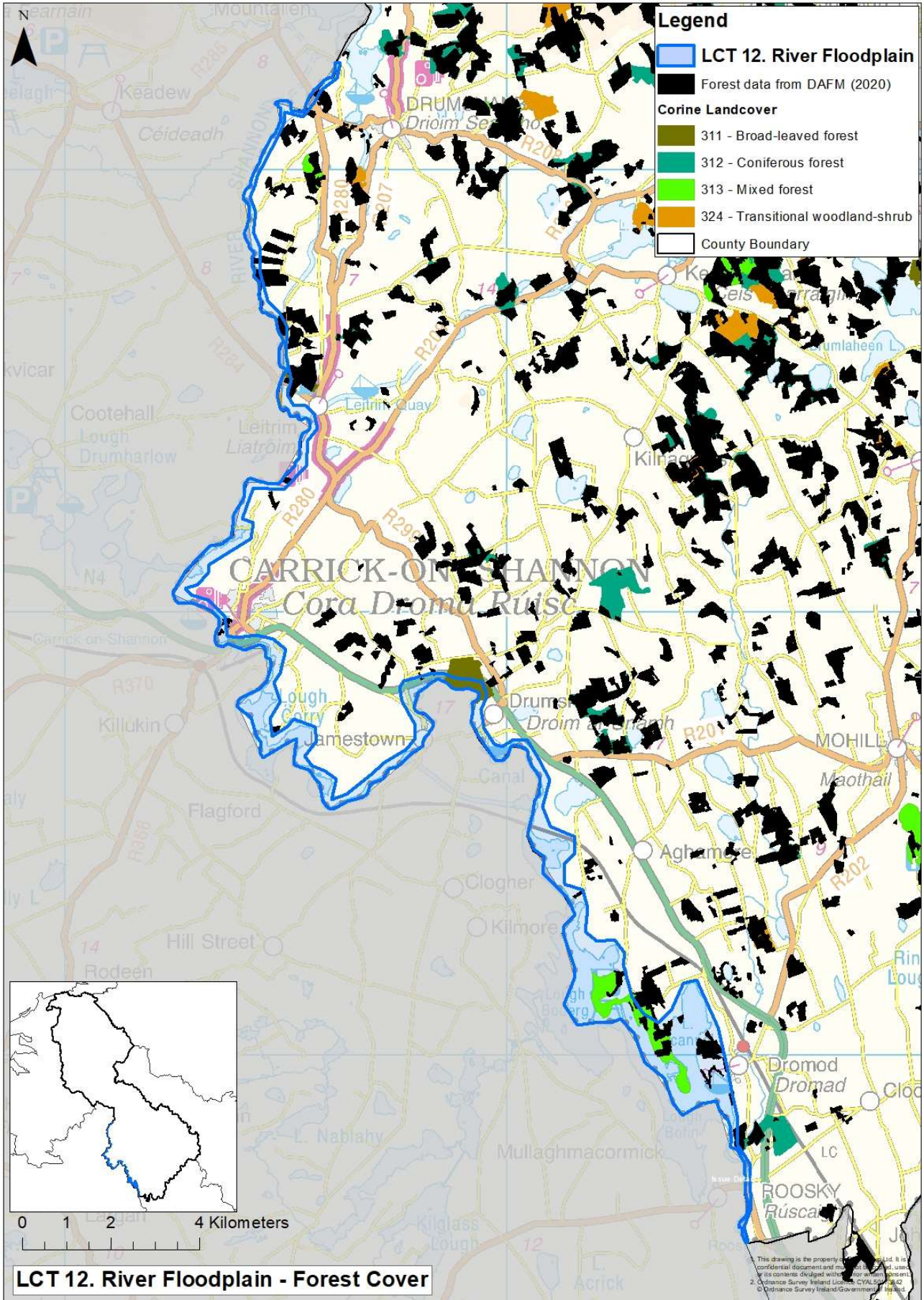
The Corine landcover data along with the available data from DAFM indicate limited plantations of commercial forestry along the River Shannon. Commercial forestry is more prevalent along the River Shannon floodplain between Leitrim and Drumshambo and also at Lough Boderg near Drumod.

3.12.1.5 Baseline Maps

The baseline for this LCT is illustrated in the following three map figures. A detailed location map is presented and this is followed by a baseline map indicating the location of proposed landscape designations, protected views and prospects. Finally, a map which presents the baseline woody vegetation cover and commercial forest cover is also presented.







LCT 12. River Floodplain - Forest Cover

3.12.2 LCT 12. River Floodplain – Assessment of Sensitivity to Commercial Forestry

The assessment of the sensitivity of LCT 12 to commercial forestry is presented below and takes account of natural criteria (including landform, landcover, scale and landscape context), visual and perceptual criteria and indicators of landscape value such as presence of designations, protected views and promoted walking routes and heritage attractions. The presence and extent of existing commercial forestry plantations is also considered in the sensitivity assessment.

3.12.2.1 LCT 12. River Floodplain – Landform, landcover and scale

The landform and features are highly distinctive owing to the unique sinuous course of the River Shannon and margins with promontories, lakes and islands present. This results in a complex landform which would be highly sensitive to commercial forestry. The river margins would also be highly sensitive to future commercial forestry due to their wet grassland landcover which, as a key characteristic of this landscape, would be eroded by commercial forestry.



River Shannon at Lough Scannal. River margins or callows are sensitive due to their distinctive sinuous form and landcover of wet grassland and woodland.

3.12.2.2 LCT 12. River Floodplain – Landscape context

This LCT is located within a wider low lying farmed landscape. The outlook towards the mountains further north is particularly focused on Slieve Anierin as a focal point of interest along with the more local hill of Sheemore near Leitrim Village. Parts of this LCT which are visually connected with this mountain and hill would be highly sensitive to commercial forestry.

3.12.2.3 LCT 12. River Floodplain – Visual and perceptual criteria

Most of this LCT has a strong visual relationship to the River Shannon with shoreline, promontories and islands which would be very sensitive to commercial forestry. A strong sense of tranquillity is experienced away from busy roads which contributes to the sensitivity.

3.12.2.4 LCT 12. River Floodplain – Landscape Value

The landscape associated with the River Shannon and floodplain is entirely designated as an AHVAs and this reflects the high landscape and scenic quality of this area. The landscape is valued for its scenery and outlook towards landmarks such as Sheemore and Slieve Anierin. The landscape is valued by recreational visitors including many travelling by boat.



Recreational boating facilities at Carrick on Shannon.

3.12.2.5 LCT 12. River Floodplain – Sensitivity ranking

This LCT is considered to be of **very high** sensitivity to commercial forestry. Almost all of this LCT falls within the proposed B11 River Shannon and Lakes AHVA reflecting the scenic quality of the River Shannon and Callows at this location. Most of the LCT is sensitive to commercial forestry due to the strong visual links with the river, promontories, crannogs and islands and the high levels of tranquillity.

3.13 LCT 13. Low Limestone Outcrops

3.13.1 Baseline

There are 2 occurrences of LCT 13 Low Limestone Outcrops within County Leitrim. These include:

- Shemore; and
- Sheebeg.

3.13.1.1 LCT 13. Low Limestone Outcrops – Landscape Character Description

The ‘Leitrim Landscape Character Assessment Review’ described LCT 13 Low Limestone Outcrops as follows.

‘The hill farmlands of Sheebeg and Sheemore comprise distinctive limestone hills which rise above the surrounding lowlands. These are low in comparison to the mountainous areas but have a distinctive hilly profile when viewed from the surrounding lowlands thereby serving as focal points in the wider landscape. Shallow soils support grazing within fields defined by a network of stone walls in contrast to the surrounding lowlands where hedgerows are dominant. Woodland is restricted to steep slopes although hedgerow trees and isolated trees within pasture and scrub provide some cover. Historically these sites provided important vantage points and clusters of Megalithic tombs indicate that they had some form of ritual or strategic significance. The outcrops are largely unsettled. Houses are strung out along the roads fringing the lower slopes and isolated farmhouses and derelict farms at the end of narrow winding lanes can be found in sheltered areas on some hillsides. The distinctive ridge is the natural location for communication masts which gain visual prominence in this location.’

3.13.1.2 LCT 13. Low Limestone Outcrops – Designated landscapes, views and prospects

The ‘Leitrim Review of Landscape Designations’ report reflects the value of particular landscapes in County Leitrim and are recognised as such in the draft County Development Plan. The entire LCT is designated as an AHVA.

Table 3-35: LCT 13. Designated Landscapes

MAP ID	Designated Landscapes
B6	Sheemore AHVA – applies to the entire hill landscape of Sheemore.
B9	Lough Scur, St John’s Lough and Environs - Applies to the hill at Sheebeg which overlooks this lake system.

The ‘Leitrim Review of Views and Prospects’ report is also recognised in the draft County Development Plan. None occur within this landscape. The distinctive hilltop associated with Sheemore is the subject of one protected view located outside this LCT tabulated below.

Table 3-36: LCT 13. Views and Prospects

MAP ID	Views and Prospects
V28	View towards Sheemore from the outskirts of Leitrim.

3.13.1.3 LCT 13. Low Limestone Outcrops – Promoted walking routes and heritage attractions

Other indicators of landscape value are the promoted walking routes and heritage attractions where landscape is an important part of the experience. These are tabulated below.

Table 3-37: LCT 12. Walking Routes and Heritage Attractions

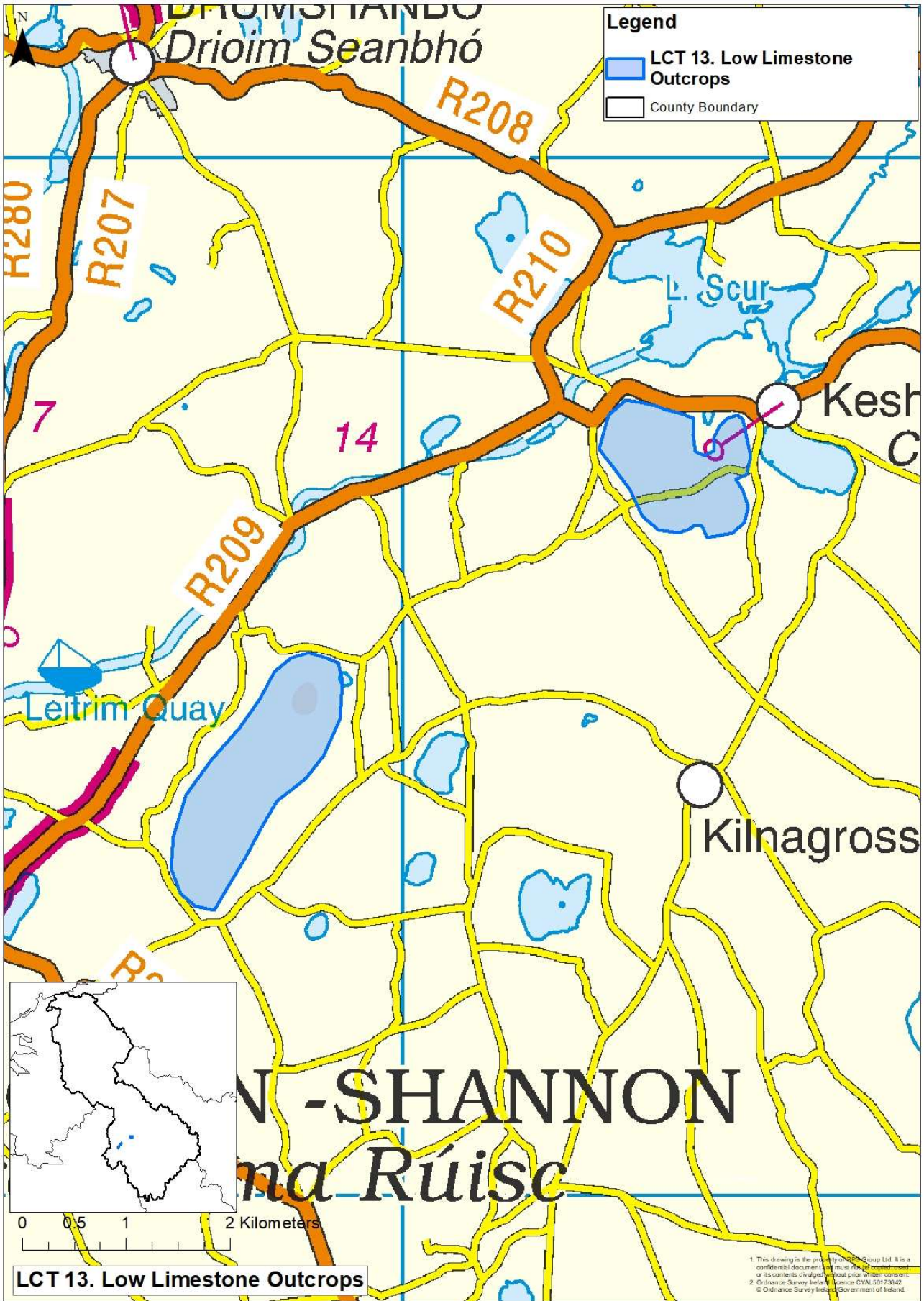
MAP ID	Walking Route / Heritage Attraction
T22	Walking route from Leitrim Village to Sheemore

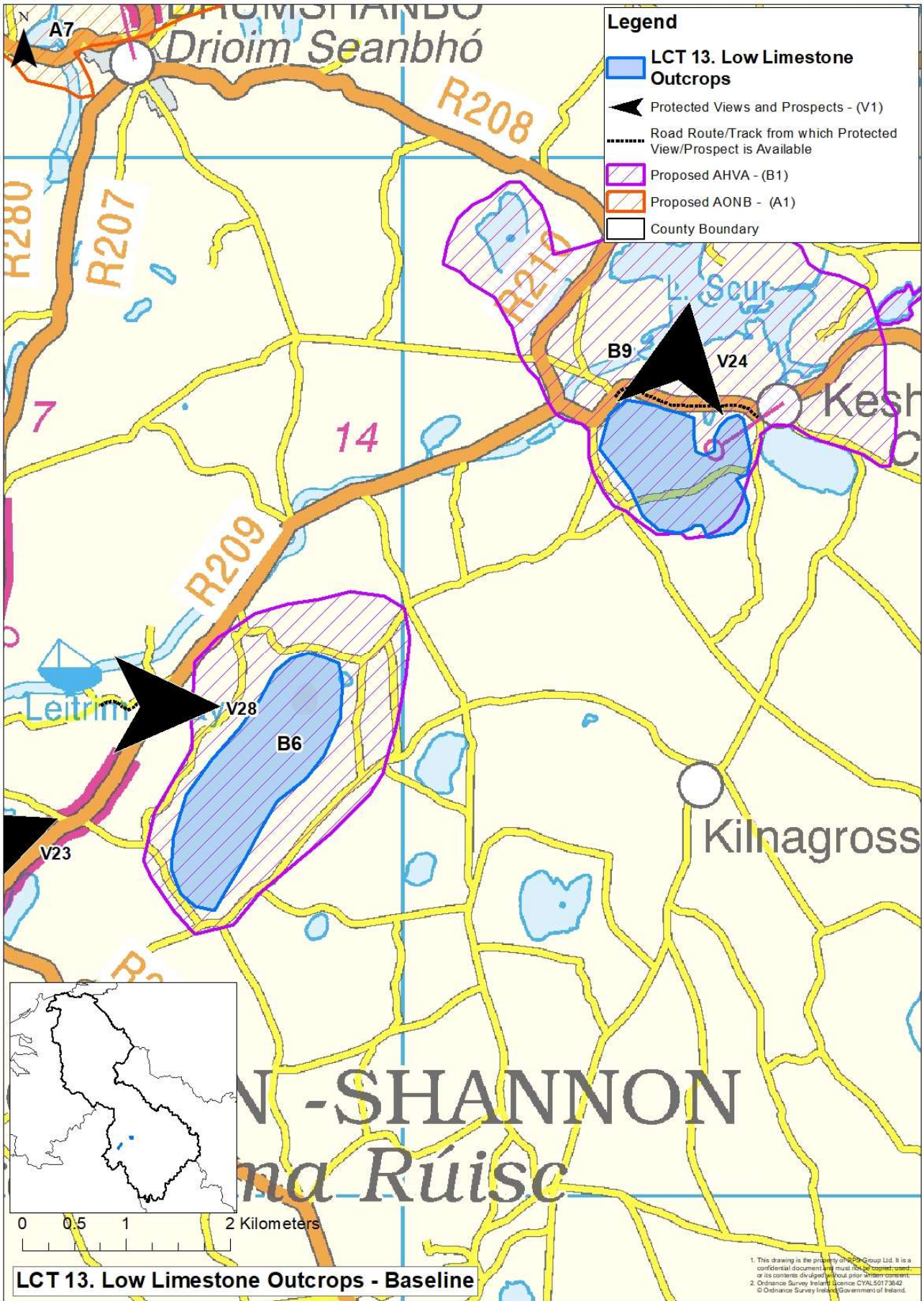
3.13.1.4 LCT 13. Low Limestone Outcrops – Existing commercial forestry

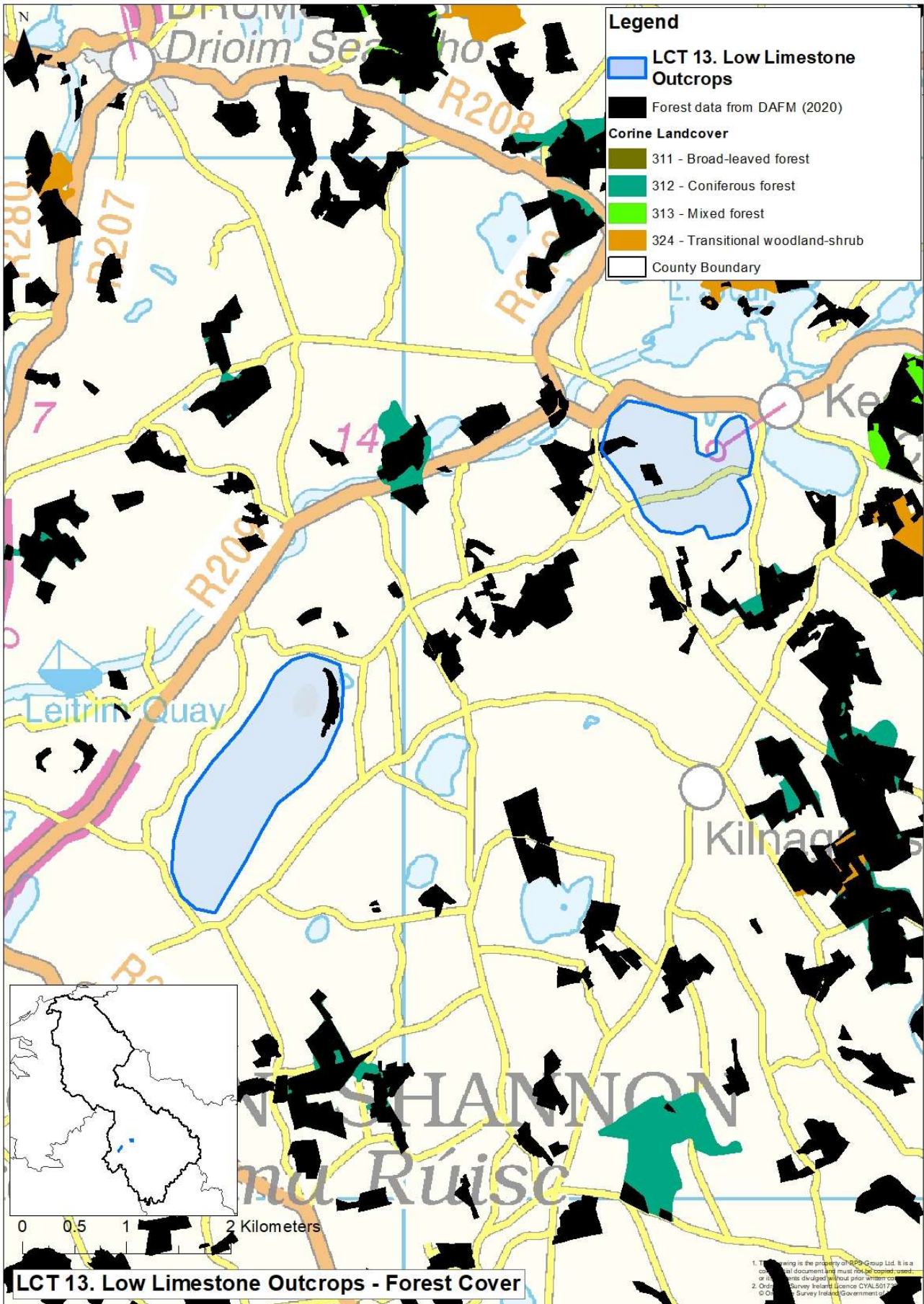
The Corine landcover data along with the available data from DAFM indicate the presence of occasional small plantations of commercial forestry within this LCT. A small linear plantation occurs on the north eastern edge of Sheemore along with two small plantations on the western side of Sheebeg.

3.13.1.5 Baseline Maps

The baseline for this LCT is illustrated in the following three map figures. A detailed location map is presented and this is followed by a baseline map indicating the location of proposed landscape designations, protected views and prospects. Finally, a map which presents the baseline woody vegetation cover and commercial forest cover is also presented.







3.13.2 LCT 13. Low Limestone Outcrops – Assessment of Sensitivity to Commercial Forestry

The assessment of the sensitivity of LCT 13 to commercial forestry is presented below and takes account of natural criteria (including landform, landcover, scale and landscape context), visual and perceptual criteria and indicators of landscape value such as presence of designations, protected views and promoted walking routes and heritage attractions. The presence and extent of existing commercial forestry plantations is also considered in the sensitivity assessment.

3.13.2.1 LCT 13. Low Limestone Outcrops – Landform, landcover and scale

These limestone hills with pastoral landcover and megalithic tomb at the summit, in particular, Sheemore, are highly sensitive to commercial forestry due to their distinctive profile. The open pastoral landcover is present throughout most of this landscape and this would be highly sensitive to commercial forestry which would be in conflict with the open grassland landcover as a key characteristic.

3.13.2.2 LCT 13. Low Limestone Outcrops – Landscape context

These hills, in particular Sheemore stand proud above the surrounding low lying drumlin farmland (LCT 9) which also features areas of woodland and mature hedgerows. Part of the drumlin farmland LCT 9 is important in that it forms the setting or context to these hills as outlined above in the capacity assessment for LCT 9.

3.13.2.3 LCT 13. Low Limestone Outcrops – Visual and perceptual criteria

These hills form important and culturally significant focal points enjoyed by many in the surrounding lowlands. Sheemore is the subject of a proposed view, V28 View towards Sheemore from the outskirts of Leitrim.



Sheemore with its distinctive profile is a landmark and focal point of interest.

3.13.2.4 LCT 13. Low Limestone Outcrops – Landscape Value

LCT 13 is a designated landscape. This reflects its landscape quality and scenic quality associated with the distinctive hilltop features and relationship of one of these to the lakes.

3.13.2.5 LCT 13. Low Limestone Outcrops – Sensitivity ranking

This LCT is considered to be of **very high** sensitivity to commercial forestry. The entire landscape is designated as AHVA. The hill at Sheebeg is less prominent than Sheemore however it overlooks Lough Scur, serving as a backdrop to that lake landscape. Sheemore is the subject of a proposed view, V28 View

towards Sheemore from the outskirts of Leitrim. The LCT is sensitive due to the distinctive landform and also the scarcity or near absence of woodland cover. Hence commercial forestry planting would be very much in conflict with the key characteristics of this landscape.

3.14 LCT 14. Drumlin Farmland with Peat Bogs

3.14.1 Baseline

LCT 14 Drumlin Farmland with Peat Bogs occupies an area of low lying wet farmland in the south of the county.

3.14.1.1 LCT 14. Drumlin Farmland with Peat Bogs – Landscape Character Description

The ‘Leitrim Landscape Character Assessment Review’ described LCT 14 Drumlin Farmland with Peat Bogs as follows.

‘This LCT comprises a gentle, undulating landscape of grazed lowlands with elongated areas of raised bog. Many areas of pasture are overtaken by rushes due to under grazing. Long, narrow stretches of raised bog and elongated loughs occupy the hollows between low drumlin hills. Stands of Scots pine and other coniferous species occur, often on reclaimed/cutover peat bogs and on the margins of loughs. Road and settlement patterns are sparse and contrast strongly with the Drumlin Farmland LCT. The main arterial routes follow the top of hills and are lined with clustered small traditional farmsteads, often surrounded by small copses. Narrower roads bordered by drainage ditches cross the raised bogs and link the main arterial routes. These tend to be sparsely settled.’

3.14.1.2 LCT 14. Drumlin Farmland with Peat Bogs – Designated landscapes, views and prospects

The ‘Leitrim Review of Landscape Designations’ report reflects the value of particular landscapes in County Leitrim and are recognised as such in the draft County Development Plan. The designations that occur within this LCT are tabulated below.

Table 3-38: LCT 14. Designated Landscapes

MAP ID	Designated Landscapes
B11	River Shannon and Lakes AHVA – applies to a small part of this LCT at The River Shannon.
B12	Lough Rynn, Lough Errew and Environs AHVA – applies to a small part of this landscape in the vicinity of Lough Rynn.

The ‘Leitrim Review of Views and Prospects’ report is also recognised in the draft County Development Plan. Those that occur within this LCT are tabulated below.

Table 3-39: LCT 14. Views and Prospects

MAP ID	Views and Prospects
V26	View of Lough Rynn

3.14.1.3 LCT 14. Drumlin Farmland with Peat Bogs – Promoted walking routes and heritage attractions

Other indicators of landscape value are the promoted walking routes and heritage attractions where landscape is an important part of the experience. These are tabulated below.

Table 3-40: LCT 14. Walking Routes and Heritage Attractions

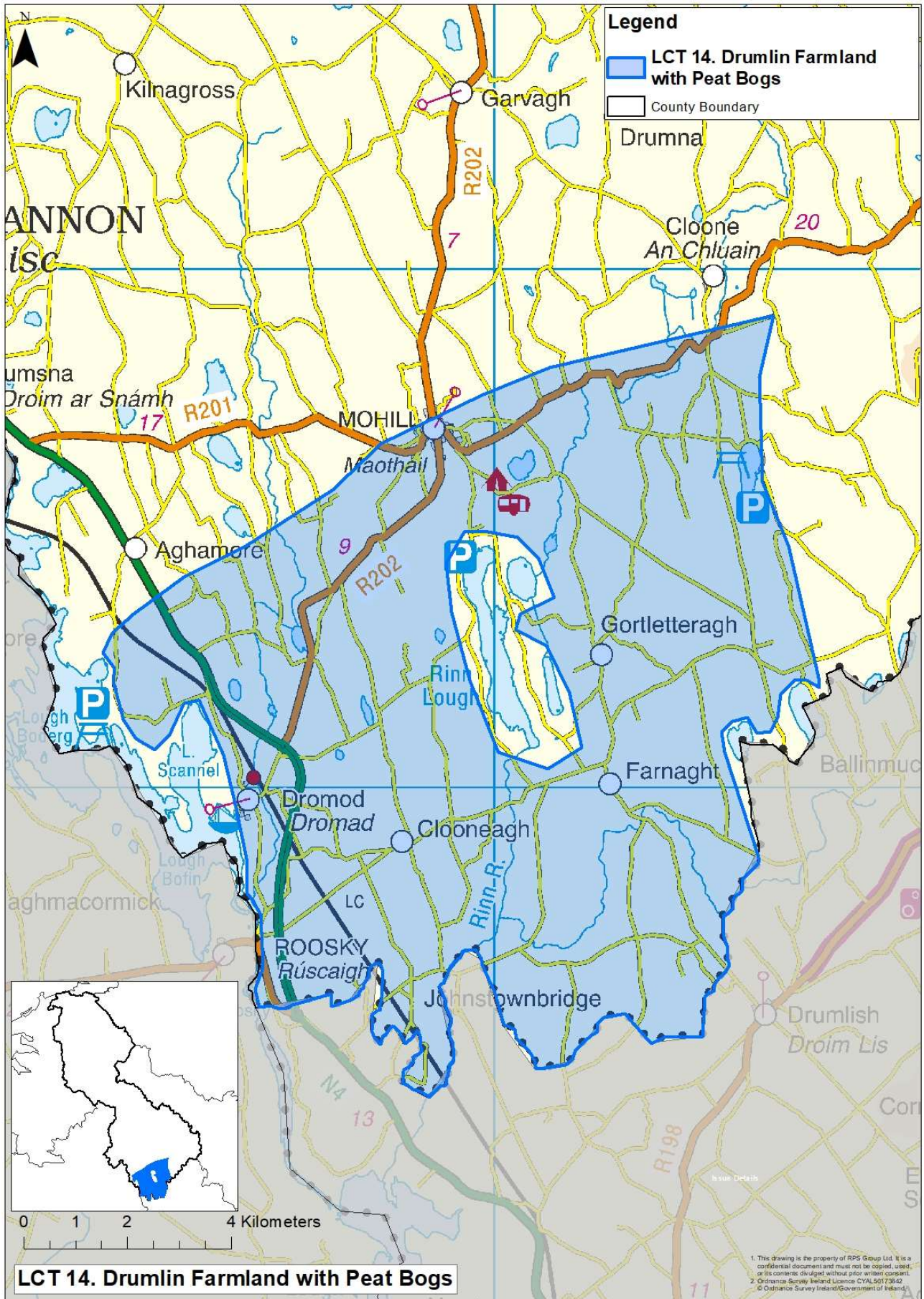
MAP ID	Walking Route / Heritage Attraction
T2	Keeldra Lake Lakeside Walk

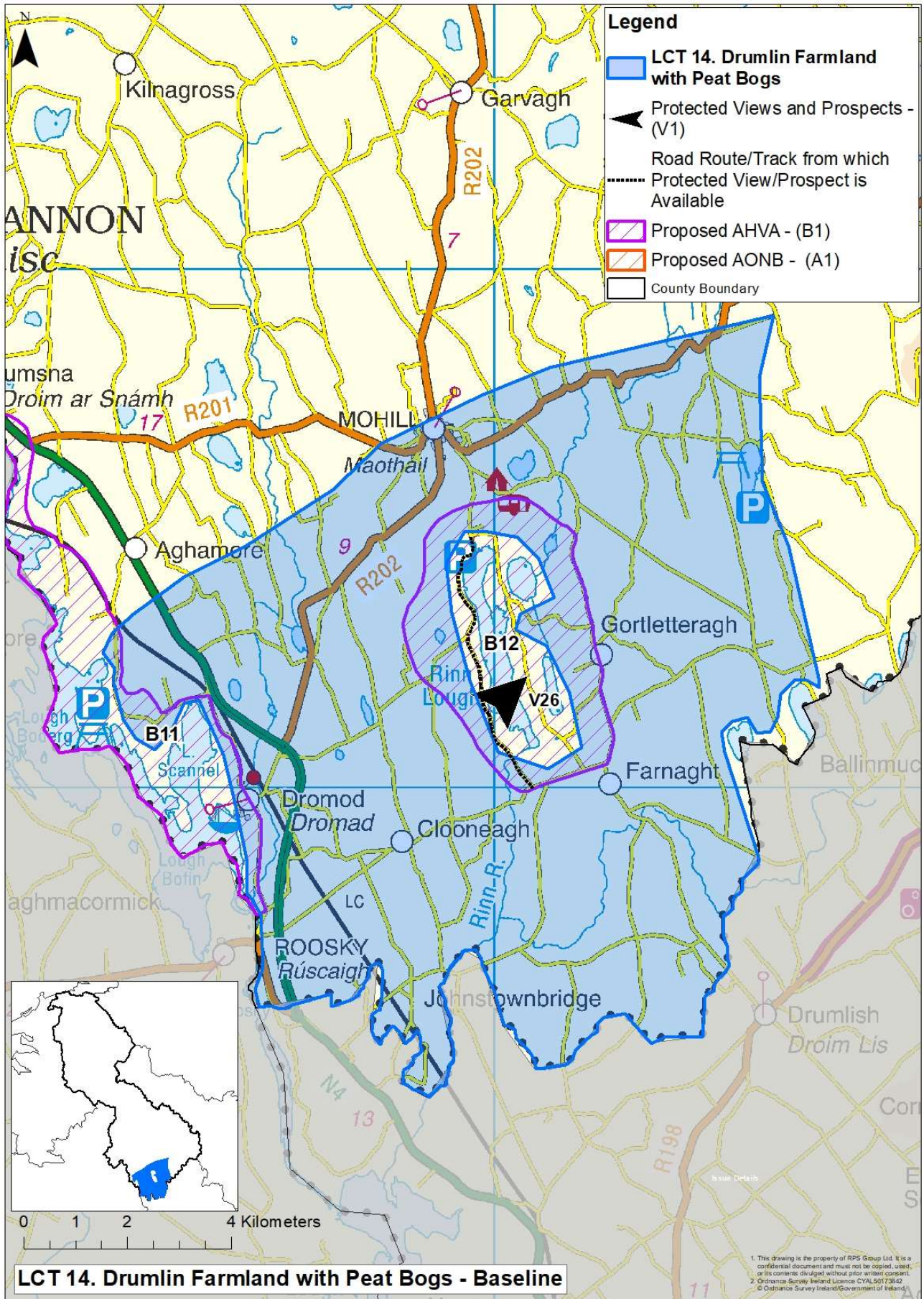
3.14.1.4 LCT 14. Drumlin Farmland with Peat Bogs – Existing commercial forestry

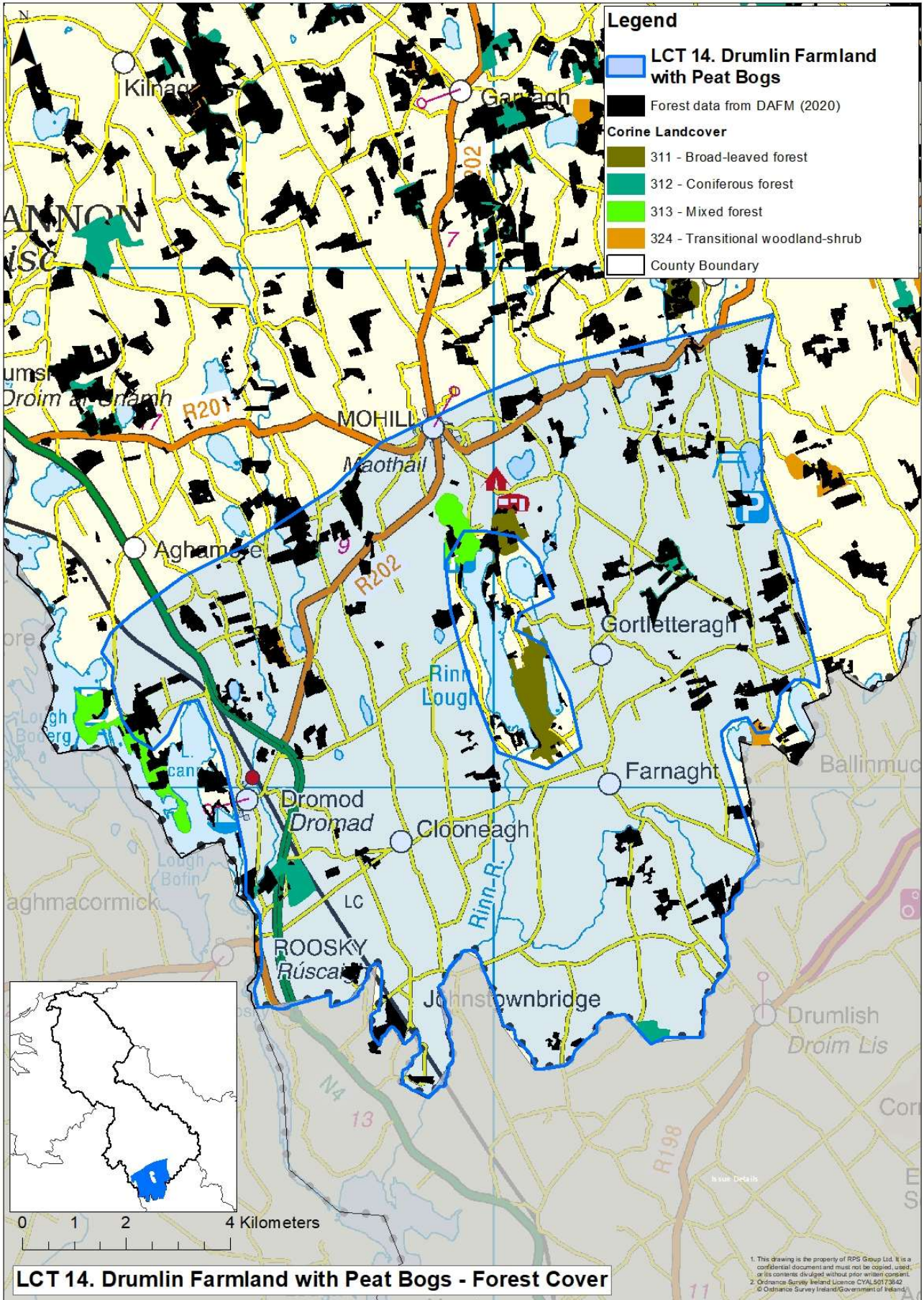
The Corine landcover data along with the available data from DAFM indicate the presence of some commercial forestry plantations dispersed throughout this LCT. These commercial forestry plantations are not a dominant landcover type in the landscape and are relatively small. Plantations are more frequent in the north of the LCT.

3.14.1.5 Baseline Maps

The baseline for this LCT is illustrated in the following three map figures. A detailed location map is presented and this is followed by a baseline map indicating the location of proposed landscape designations, protected views and prospects. Finally, a map which presents the baseline woody vegetation cover and commercial forest cover is also presented.







3.14.2 LCT 14. Drumlin Farmland with Peat Bogs – Assessment of Sensitivity to Commercial Forestry

The assessment of the sensitivity of LCT 14 to commercial forestry is presented below and takes account of natural criteria (including landform, landcover, scale and landscape context), visual and perceptual criteria and indicators of landscape value such as presence of designations, protected views and promoted walking routes and heritage attractions. The presence and extent of existing commercial forestry plantations is also considered in the sensitivity assessment.

3.14.2.1 LCT 14. Drumlin Farmland with Peat Bogs – Landform, landcover and scale

Areas of this landscape that feature gently undulating lowland landform with woodland and hedgerow cover may be of lower sensitivity to commercial forestry. Areas with a distinct, small scale field pattern would be more sensitive as this characteristic could be easily eroded by new commercial forestry planting. Areas of this landscape comprised of bog and wetland areas with loughs would be of highest sensitivity to commercial forestry together with areas in close proximity to lakes.



Farmed landscape with woodland has some capacity for commercial forestry.



Areas of farmland with small scale field patterns are more sensitive to commercial forestry.

3.14.2.2 LCT 14. Drumlin Farmland with Peat Bogs – Landscape context

This landscape along with part of the adjacent LCT 11 Drumlin Loughs and Stream Margins contributes to the setting for the River Shannon, Lough Rynn along with a number of small lakes. These areas of farmland would be highly sensitive to commercial forestry which would undermine their character and the backdrop that such areas contribute to the lakes and rivers.

3.14.2.3 LCT 14. Drumlin Farmland with Peat Bogs – Visual and perceptual criteria

This is a working landscape, albeit relatively tranquil away from busy roads. It is especially tranquil close to lake margins. Lakes are important focal points and the landscape around these is of some scenic quality and sensitive to commercial forestry.

3.14.2.4 LCT 14. Drumlin Farmland with Peat Bogs – Landscape Value

LCT 14 in the vicinity of the River Shannon and Lough Rynn is a designated AHVA and this reflects the landscape quality and scenic quality of these areas which would be sensitive to commercial forestry.

3.14.2.5 LCT 14. Drumlin Farmland with Peat Bogs – Sensitivity ranking

This LCT is considered to be of **low** sensitivity to commercial forestry. The majority of this LCT lies outside any of the proposed designations apart from small areas around the margin of Lough Rynn and the River Shannon. The LCT is highly sensitive in the vicinity of these water bodies and smaller lakes along with open areas of peat bog.

3.15 LCT 15. Undulating Hill Farmland

3.15.1 Baseline

LCT 15 Undulating Hill Farmland occupies a large area of farmland in south County Leitrim.

3.15.1.1 LCT 15. Undulating Hill Farmland – Landscape Character Description

The ‘Leitrim Landscape Character Assessment Review’ described LCT 15 Undulating Hill Farmland as follows.

‘The topography of this landscape comprises a ridgeline oriented in an east west direction at slightly higher elevation (c. 150m AOD) than the surrounding drumlin farmland. The distinctive rolling nature of the summit gives way to sloping sides fretted by numerous streams draining the uplands. Soils tend to be poorly drained. The land cover comprises pasture with a field pattern strongly defined by dense mature hedgerows. Minor roads cross the landscape and settlement is generally sparse with individual dwellings located along long winding lanes, fringed with tall rambling hedges. Where landform and land cover allow, extensive views over the surrounding lowlands or towards mountains are afforded. Occasional tracts of plantation coniferous forest occur within this landscape.’

3.15.1.2 LCT 15. Undulating Hill Farmland – Designated landscapes, views and prospects

The ‘Leitrim Review of Landscape Designations’ report reflects the value of particular landscapes in County Leitrim and are recognised as such in the draft County Development Plan. There are none within this LCT. Similarly, the ‘Leitrim Review of Views and Prospects’ report is also recognised in the draft County Development Plan of which none occur within this landscape.

3.15.1.3 LCT 15. Undulating Hill Farmland – Promoted walking routes and heritage attractions

Other indicators of landscape value are the promoted walking routes and heritage attractions where landscape is an important part of the experience. These are tabulated below.

Table 3-41: LCT 15. Walking Routes and Heritage Attractions

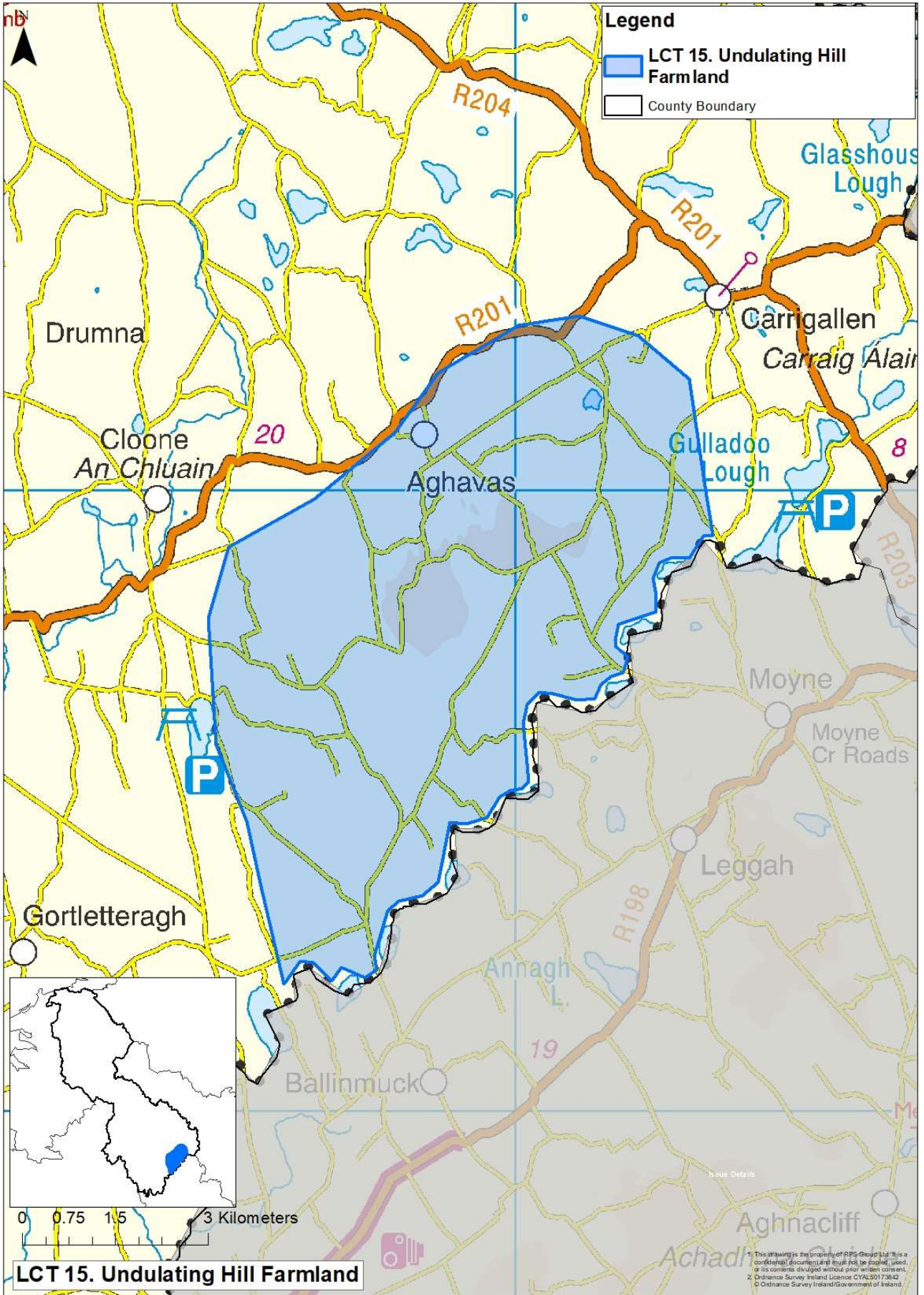
MAP ID	Walking Route / Heritage Attraction
H8	Margaret of New Orleans Birthplace

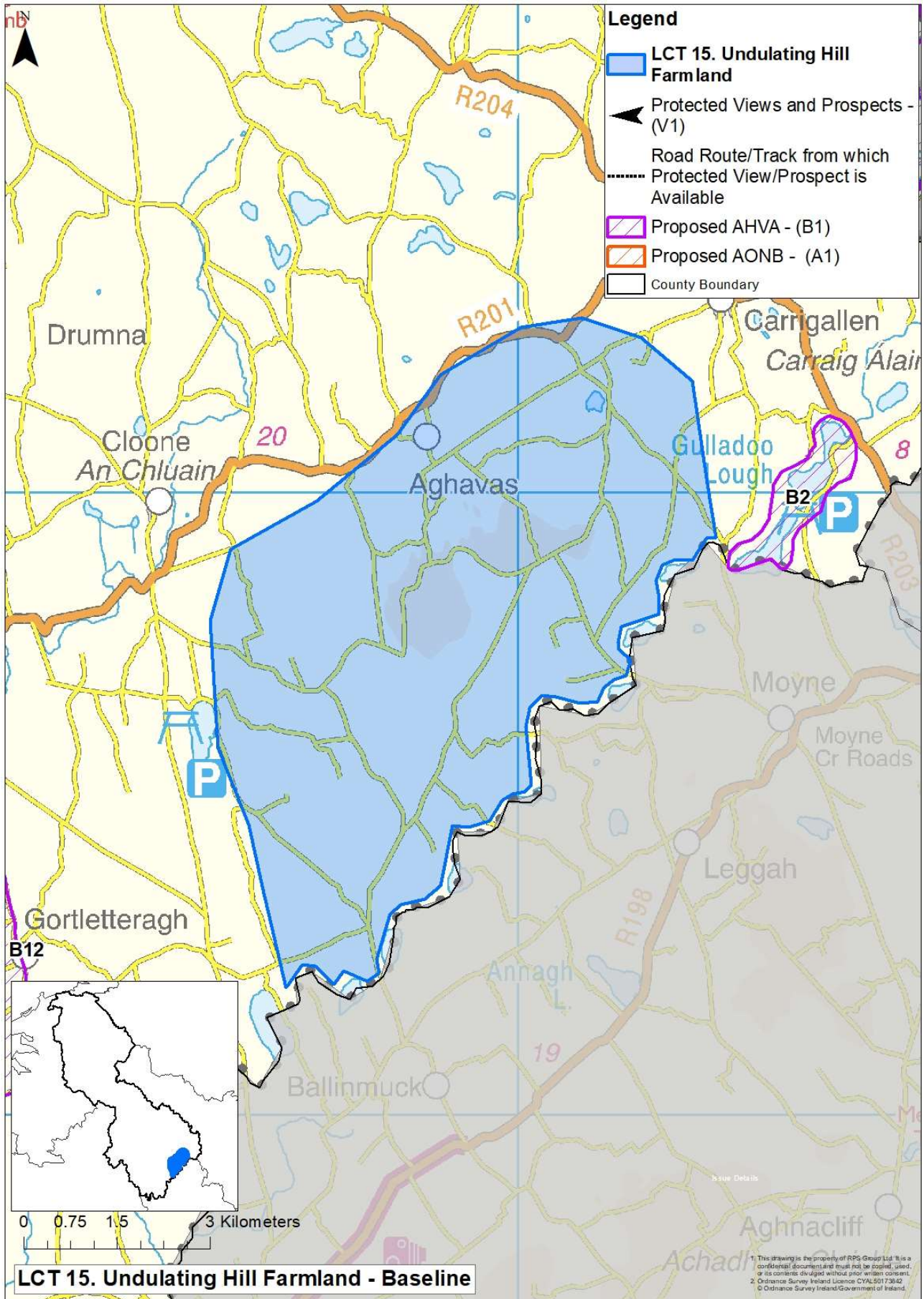
3.15.1.4 LCT 15. Undulating Hill Farmland – Existing commercial forestry

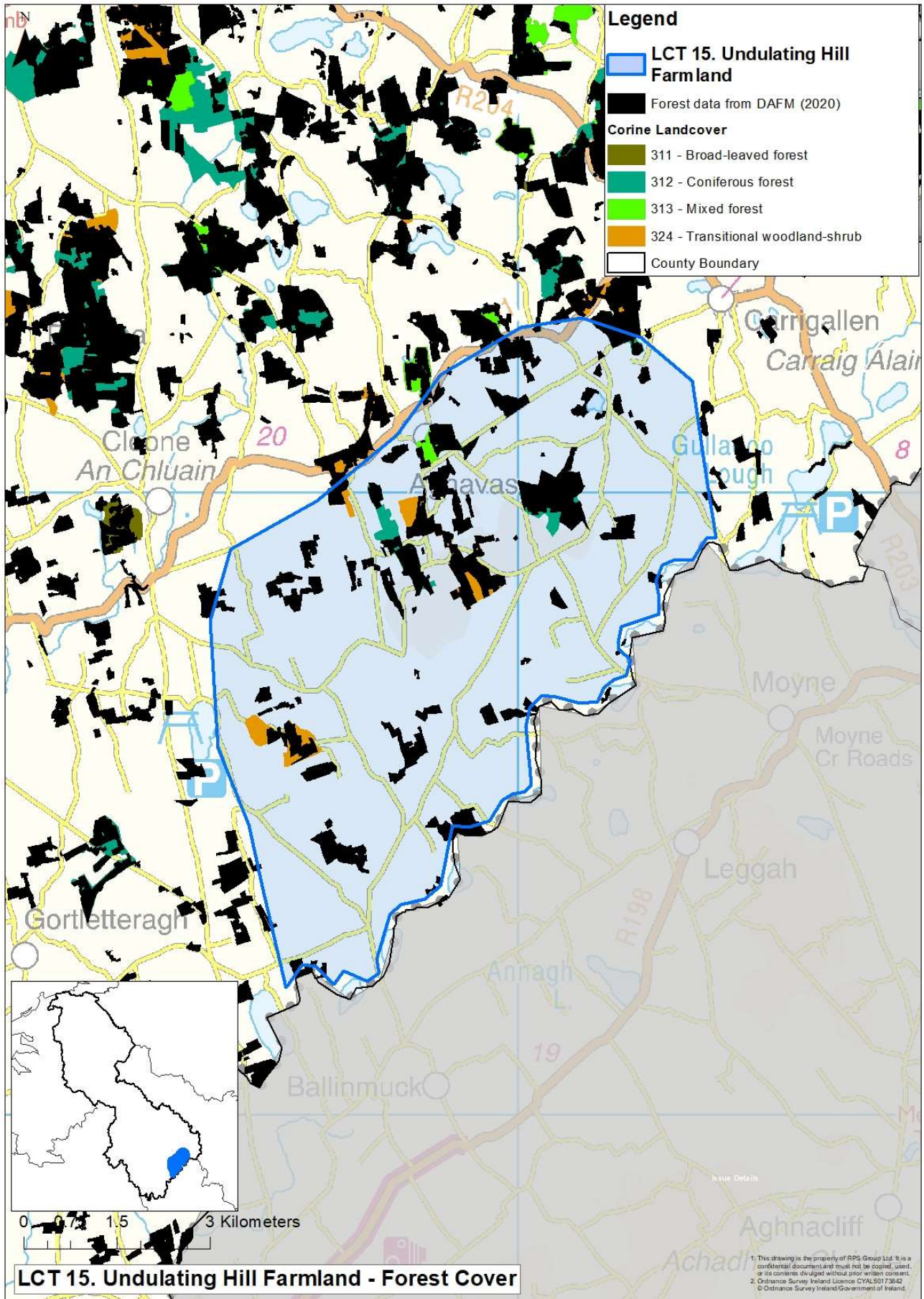
The Corine landcover data along with the available data from DAFM indicate the presence of commercial forestry plantations especially in the northern part of this LCT. Some of these are extensive and are noticeable elements in the landscape in the vicinity of Corriga and Aghavas.

3.15.1.5 Baseline Maps

The baseline for this LCT is illustrated in the following three map figures. A detailed location map is presented and this is followed by a baseline map indicating the location of proposed landscape designations, protected views and prospects. Finally, a map which presents the baseline woody vegetation cover and commercial forest cover is also presented.







3.15.2 LCT 15. Undulating Hill Farmland – Assessment of Sensitivity to Commercial Forestry

The assessment of the sensitivity of LCT 15 to commercial forestry is presented below and takes account of natural criteria (including landform, landcover, scale and landscape context), visual and perceptual criteria and indicators of landscape value such as presence of designations, protected views and promoted walking routes and heritage attractions. The presence and extent of existing commercial forestry plantations is also considered in the sensitivity assessment.

3.15.2.1 LCT 15. Undulating Hill Farmland – Landform, landcover and scale

The gently rising landform combined with wooded cover would be of lower sensitivity to commercial forestry due to the ability of this landscape to absorb plantings of an appropriate scale. The landscape at the highest elevations may be more sensitive due to the potential for commercial forestry to be seen rising up and discordant with surrounding farmland. The summit of the ridgeline, at highest elevation of c.190m would be particularly sensitive to commercial forestry which would be visually prominent and in conflict with the character of the surrounding landscape.

3.15.2.2 LCT 15. Undulating Hill Farmland – Landscape context

This LCT is located adjacent and south of LCT 9. Drumlin Farmland. The southern part of this landscape is overlooked by the more elevated hill farmland landscape further south in the neighbouring County Longford along with the mountains further north in Leitrim. These areas are considered to be sensitive to commercial forestry due to the visual link with the nearby hills in County Longford which are appreciated from within this LCT.



Mountains of north Leitrim are seen as focal points from the more elevated part of this LCT near Corriga.



Hills further south (in County Longford) are seen as focal points from the more elevated part of this LCT near Corriga.

3.15.2.3 LCT 15. Undulating Hill Farmland – Visual and perceptual criteria

The landscape is perceived as a working farmed landscape which is relatively tranquil away from busy roads. There are limited distinctive skylines or unique specific focal points enjoyed as scenic views and for which commercial forestry plantations would be in conflict apart from the nearby hills in County Longford and the lakes and small rivers at the southern county boundary.

3.15.2.4 LCT 15. Undulating Hill Farmland – Landscape Value

LCT 15 is undesignated. It has limited features by way of walking routes and promoted points of interest for visitors. The landscape is considered to be of some value to locals and passing visitors generally due to the rural quality, tranquil nature and overall good condition of the area. It is considered to be capable of absorbing some commercial forestry where sensitively designed.

3.15.2.5 LCT 15. Undulating Hill Farmland – Sensitivity ranking

This LCT is considered to be of **low** sensitivity to commercial forestry. It is undesignated. The uniformity of the landform and presence of wooded landcover is such that commercial forest plantations of an appropriated scale could be absorbed into most of this landscape apart from the more elevated ridgelines.

3.16 LCT 16. Steep Mountain Peaks

3.16.1 Baseline

LCT 16 Steep Mountain Peaks applies to a landscape of distinctive hills in the north west of the county.

3.16.1.1 LCT 16. Steep Mountain Peaks – Landscape Character Description

The ‘Leitrim Landscape Character Assessment Review’ described LCT 16 Steep Mountain Peaks as follows.

‘These steep sided mountain peaks have a smooth profile and small scree slopes create a distinctive, notched skyline. These occur as a result of particular geological conditions where a largely chert free form of limestone exists as mud banks forming rounded hummocky hills. Natural grassland is the predominant land cover with heath and plantation coniferous forests occupying gentler slopes. This LCT is remote with little or no access although viewed and enjoyed from the valley landscapes below.’

3.16.1.2 LCT 16. Steep Mountain Peaks – Designated landscapes, views and prospects

The ‘Leitrim Review of Landscape Designations’ report reflects the value of particular landscapes in County Leitrim and are recognised as such in the draft County Development Plan. Almost the entire LCT falls within the following designated AONBs.

Table 3-42: LCT 16. Designated Landscapes

MAP ID	Designated Landscapes
A3	Mountains and Glens of North Leitrim AONB - applies to the northern part of this LCT.
A4	Lough Gill, Leean Mountain and Environs AONB – applies to the southern part of this LCT.

The ‘Leitrim Review of Views and Prospects’ report is also recognised in the draft County Development Plan. None occur within this landscape. The distinctive features in this landscape are the subject of one protected views in particular tabulated below.

Table 3-43: LCT 16. Views and Prospects

MAP ID	Views and Prospects
V29	View towards the Leean Mountain Range and Doon Lough from the R278 Regional Road.

3.16.1.3 LCT 16. Steep Mountain Peaks – Promoted walking routes and heritage attractions

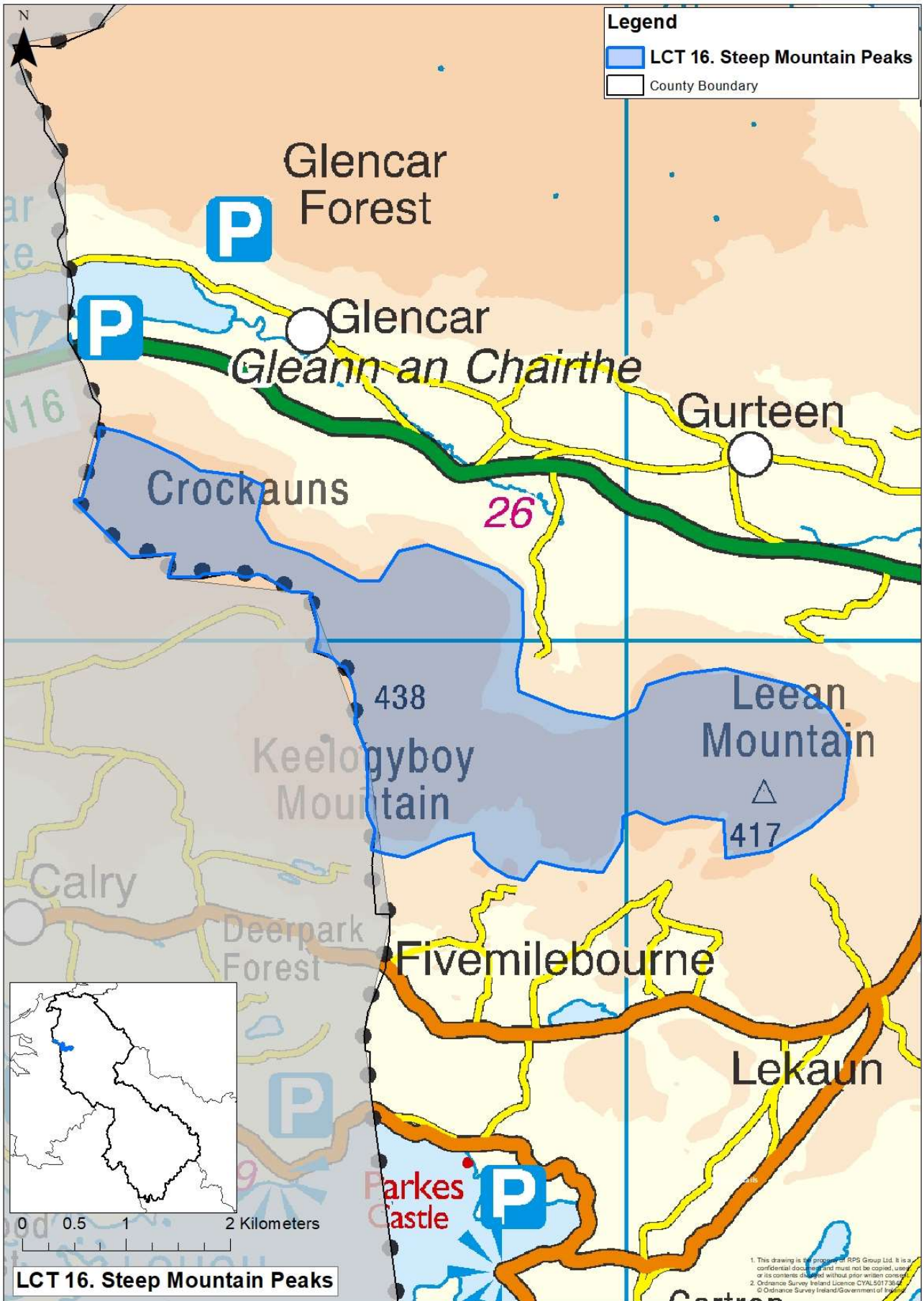
Other indicators of landscape value are the promoted walking routes and heritage attractions where landscape is an important part of the experience. There are none specifically located within this LCT although the mountain scenery is enjoyed by visitors travelling generally through the area.

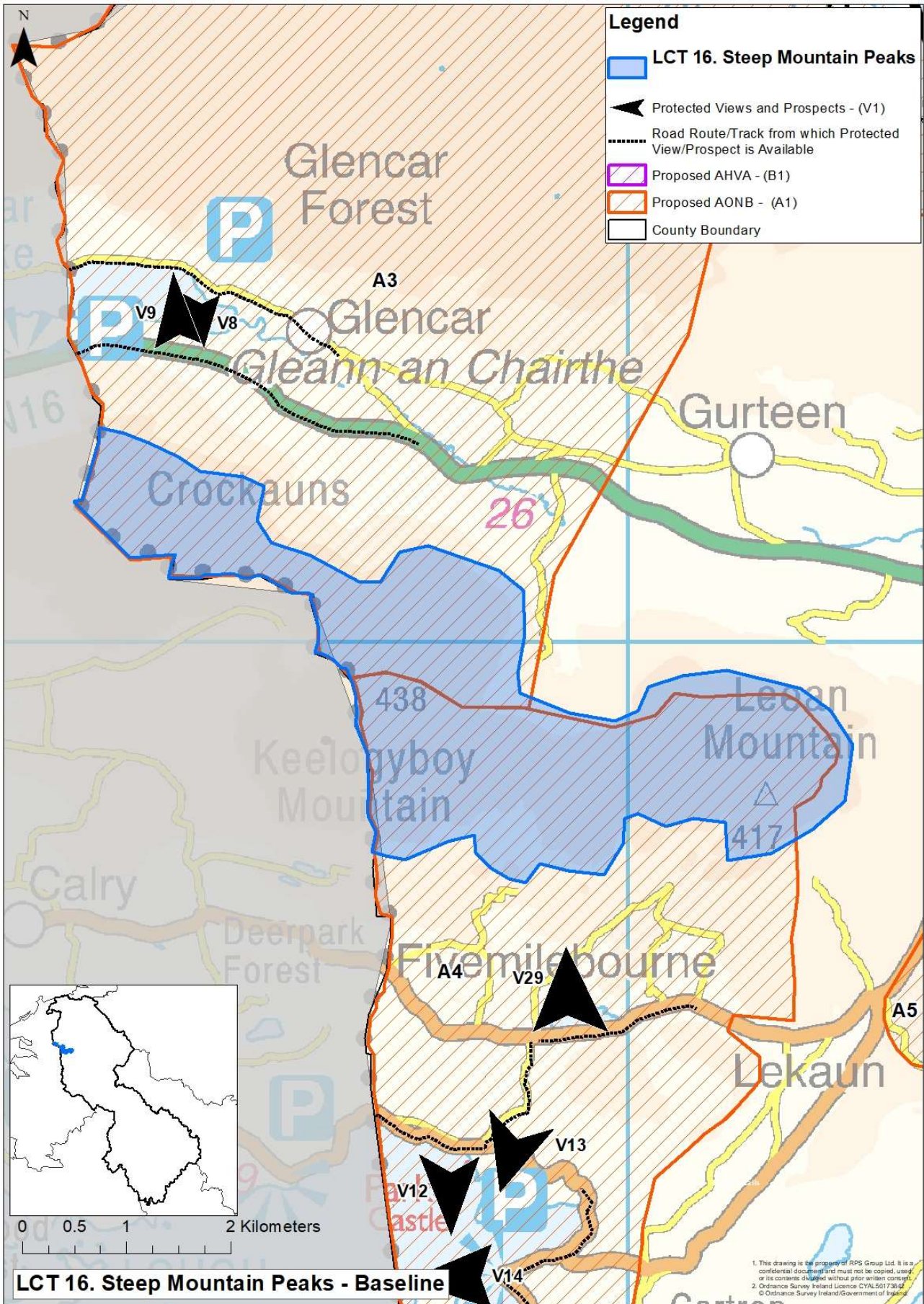
3.16.1.4 LCT 16. Steep Mountain Peaks – Existing commercial forestry

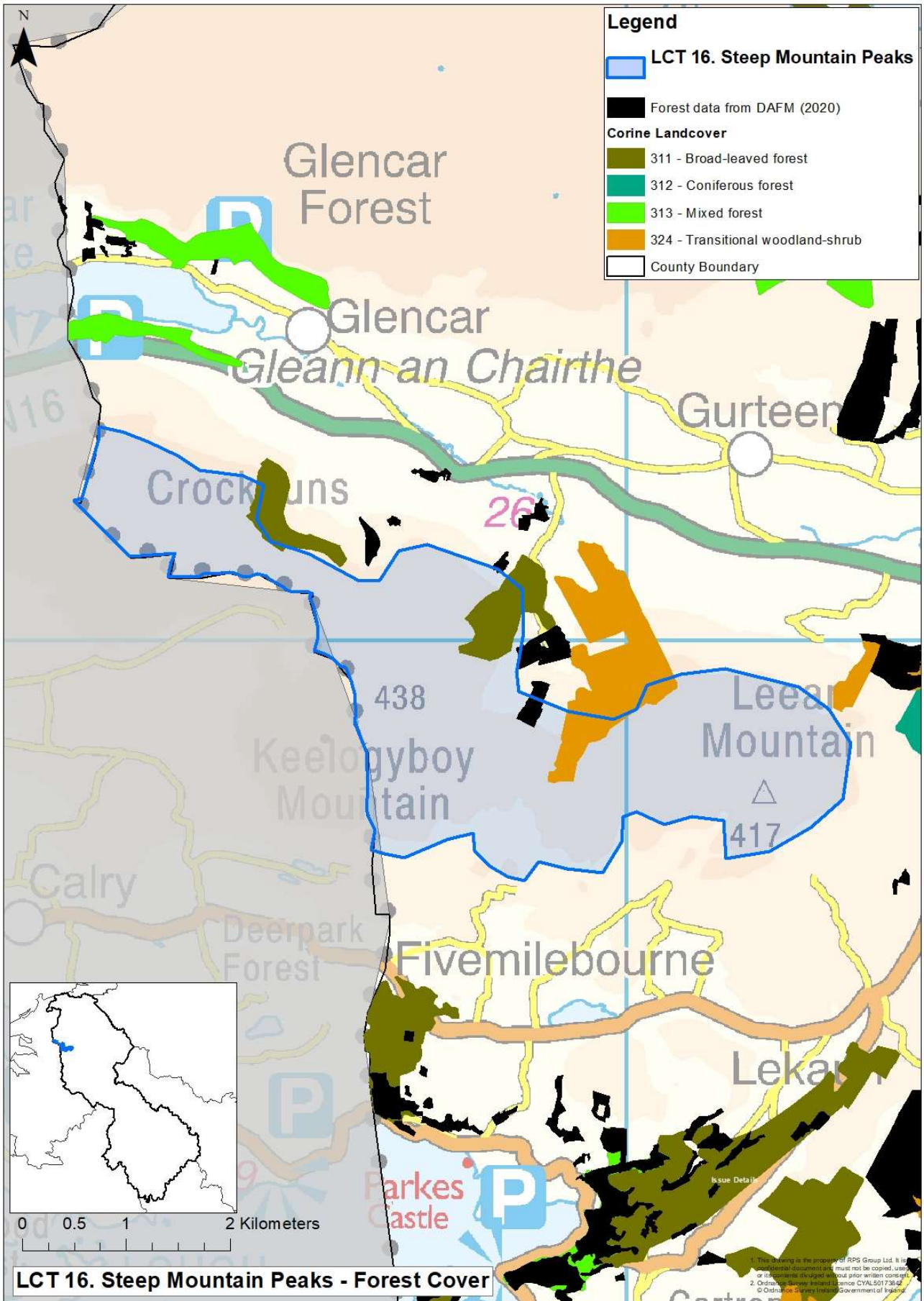
The Corine landcover data along with the available data from DAFM indicate that there is scarcely any commercial forestry within this LCT. A small area of commercial forestry is located in the valley between Hangman’s Hill and Leean Mountain. Part of this plot lies within the adjacent LCT 6 Moorland Hills.

3.16.1.5 Baseline Maps

The baseline for this LCT is illustrated in the following three map figures. A detailed location map is presented and this is followed by a baseline map indicating the location of proposed landscape designations, protected views and prospects. Finally, a map which presents the baseline woody vegetation cover and commercial forest cover is also presented.







3.16.2 LCT 16. Steep Mountain Peaks – Assessment of Sensitivity to Commercial Forestry

The assessment of the sensitivity of LCT 16 to commercial forestry is presented below and takes account of natural criteria (including landform, landcover, scale and landscape context), visual and perceptual criteria and indicators of landscape value such as presence of designations, protected views and promoted walking routes and heritage attractions. The presence and extent of existing commercial forestry plantations is also considered in the sensitivity assessment.

3.16.2.1 LCT 16. Steep Mountain Peaks – Landform, landcover and scale

This LCT features a complex landform of distinctive peaks and scree slopes which present as a unique skyline from the surrounding lower lying areas. The complexity of the landform is such that it would be highly sensitive to commercial forestry. The more elevated summits and exposed areas of moorland are especially sensitive to commercial forestry which would be in contrast and at variance with the character of this LCT. At lower elevations where some woody cover is present, there may be some limited capacity to accommodate commercial forestry where this would not interfere with important skylines. Areas featuring bog and heath are highly sensitive.



Distinctive landforms associated with the steep mountain peaks LCT, from the N16 Road approaching Glencar.

3.16.2.2 LCT 16. Steep Mountain Peaks – Landscape context

This landscape of distinctive peaks overlooks the adjacent lower lying tabular hills to the south and lower lying farmed landscape in the surrounding valleys including that at Glencar. These landscapes are important in that they form the setting for the steep mountain peaks in this LCT. In this regard, the LCT is overall very highly sensitive to commercial forestry which would be prominent in this upland landscape and which would have an adverse influence on the surrounding valleys, hills and lakes.

3.16.2.3 LCT 16. Steep Mountain Peaks – Visual and perceptual criteria

This LCT is remote and tranquil. The mountains form distinctive unique skylines. The LCT is highly sensitive to commercial forestry which, if introduced could potentially undermine the sense of wildness and tranquillity and also obstruct important skyline views.

3.16.2.4 LCT 16. Steep Mountain Peaks – Landscape Value

Almost the entire LCT is designated as AONB. The mountain peaks form the backdrop to protected view no 29 focussed on Doon Lough. The designations reflect the landscape quality and scenic quality of the area which is generally enjoyed by visitors and would be very highly sensitive to commercial forestry.

3.16.2.5 LCT 16. Steep Mountain Peaks – Sensitivity ranking

This LCT is considered to be of **very high** sensitivity to commercial forestry. Almost all of this LCT falls within proposed AONB designations and this reflects the outstanding beauty of the landscape. The LCT is sensitive due to the remote, tranquil and wilderness like qualities as well as the distinctive and complex mountain skylines which would be highly sensitive to change. The moorland and bog landcover and scarcity of wooded vegetation results in a visually exposed landscape dominated by grassland and heath in which, commercial forestry planting would be in conflict and would undermine the key characteristics.

3.17 LCT 17. Tabular Hills

3.17.1 Baseline

LCT 17 Tabular Hills occurs in the north west of the county. It applies to a complex of hills that surround Lough Gill.

3.17.1.1 LCT 17. Tabular Hills – Landscape Character Description

The ‘Leitrim Landscape Character Assessment Review’ described LCT 17 Tabular Hills as follows.

‘This LCT features distinctive tabular hills formed from karstic weathering of cherty limestones in horizontal beds. Rough pasture and scrub occupy the tabular hills and grazing is located within the increasingly rush infested fields on gentler lower slopes. Scrub is most visible where it has colonised the flat top of the tabular hills and disguises the distinctive bedding planes. Deciduous woodlands and coniferous plantations are numerous on the gentler undulations. Settlement is sparse and restricted to a small number of isolated farms off main routes on narrow tracks and lanes.’

3.17.1.2 LCT 17. Tabular Hills – Designated landscapes, views and prospects

The ‘Leitrim Review of Landscape Designations’ report reflects the value of particular landscapes in County Leitrim and are recognised as such in the draft County Development Plan. Almost all of this LCT falls within a designated AONB as tabulated below.

Table 3-44: LCT 17. Designated Landscapes

MAP ID	Designated Landscapes
A4	Lough Gill, Leean Mountain and Environs AONB – applies to most of this LCT.

The ‘Leitrim Review of Views and Prospects’ report is also recognised in the draft County Development Plan. Those that occur within this LCT are tabulated below.

Table 3-45: LCT 17. Views and Prospects

MAP ID	Views and Prospects
V12	View of Lough Gill from the R286 Regional Road
V13	View of Lough Gill from Carrickanurroo
V14	View of Lough Gill from the R288
V29	View towards the Leean Mountain Range and Doon Lough from the R278 Regional Road

3.17.1.3 LCT 17. Tabular Hills – Promoted walking routes and heritage attractions

Other indicators of landscape value are the promoted walking routes and heritage attractions where landscape is an important part of the experience. These are tabulated below.

Table 3-46: LCT 17. Walking Routes and Heritage Attractions

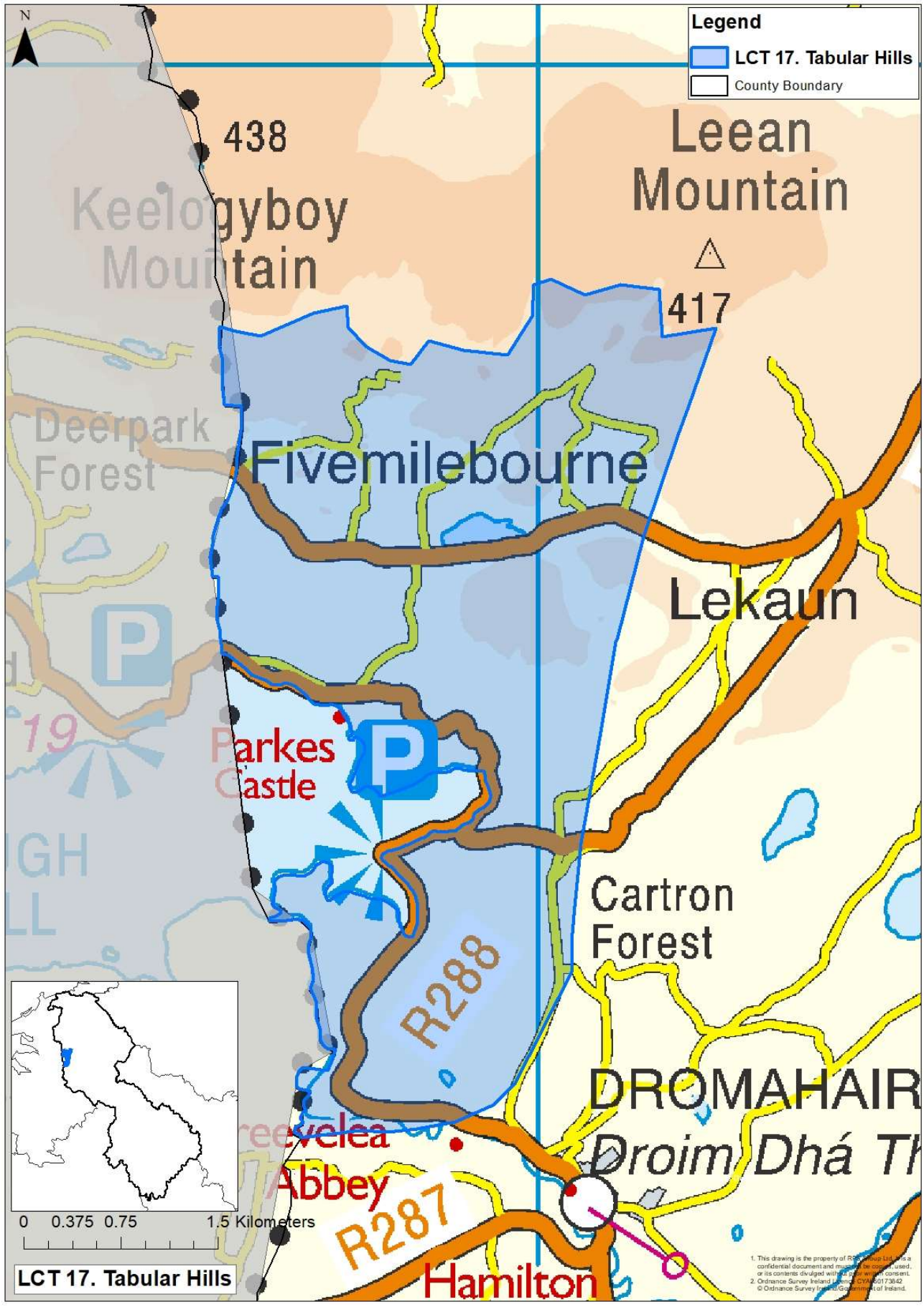
MAP ID	Walking Route / Heritage Attraction
T5	Cartron Wood Trail is located on the northern shoreline of Lough Gill
H1	Parkes Castle is located on the northern shoreline of Lough Gill

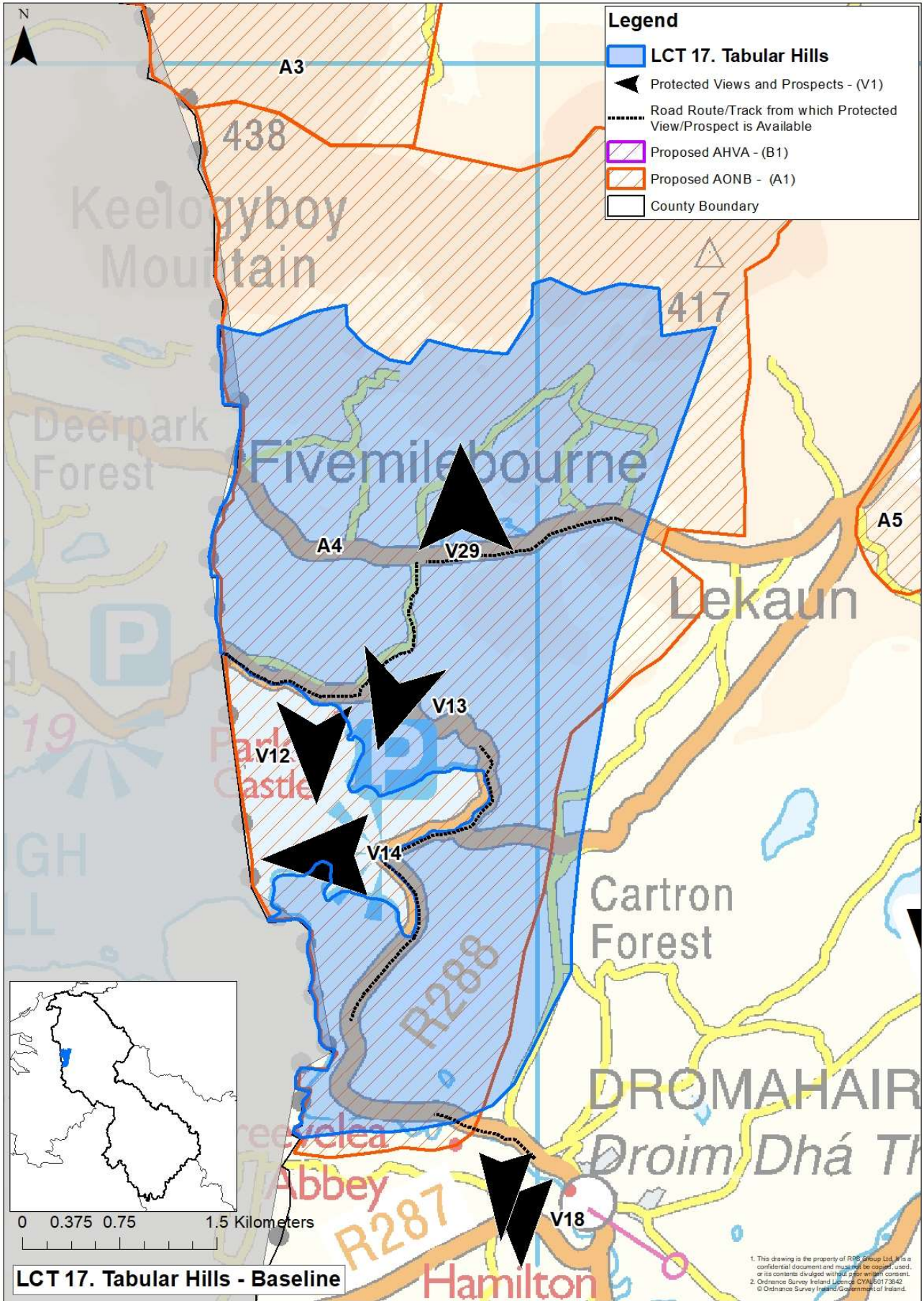
3.17.1.4 LCT 17. Tabular Hills – Existing commercial forestry

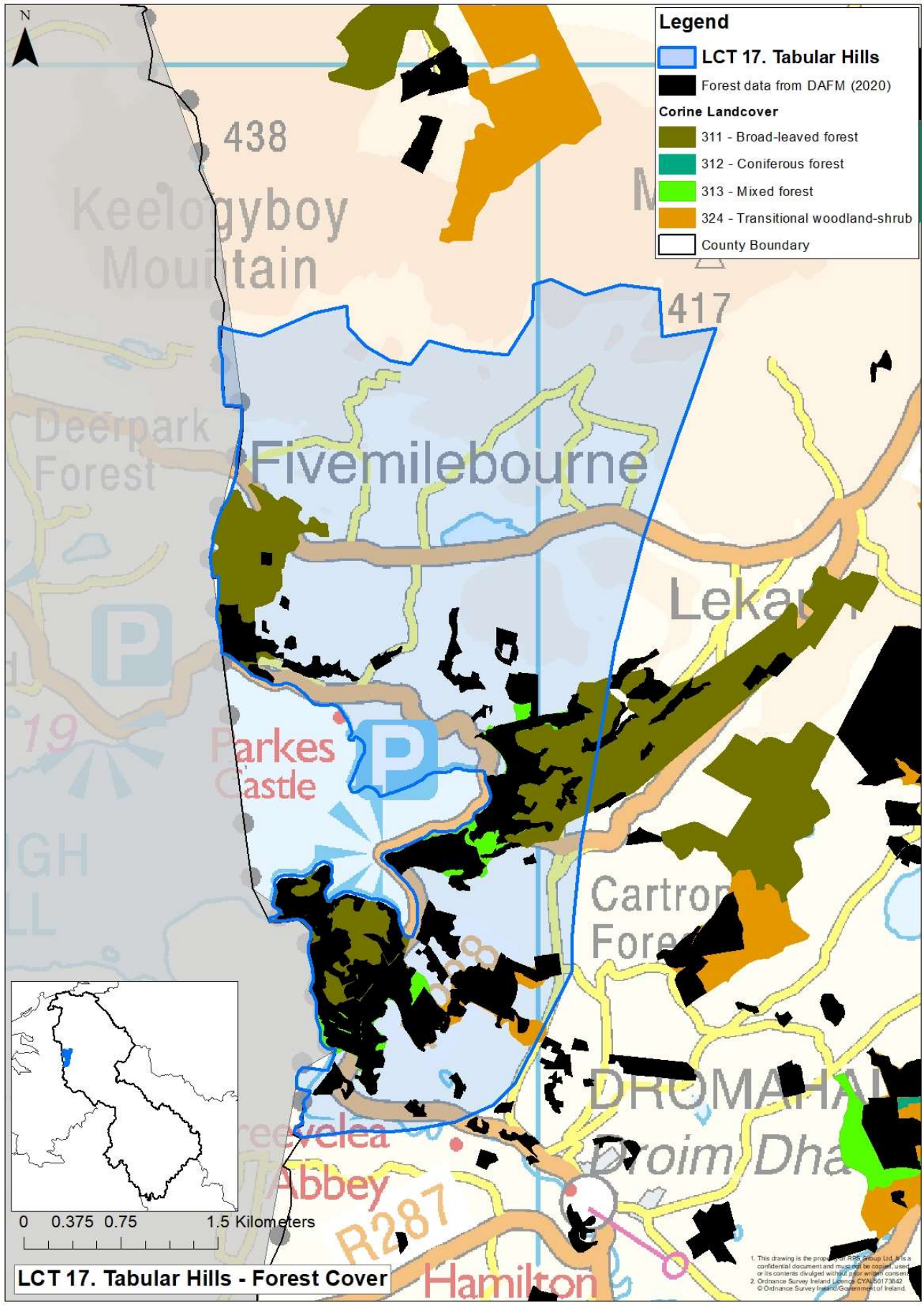
The Corine landcover data along with the available data from DAFM indicate the presence of commercial forestry in the southern part of this LCT, in the hills that surround Lough Gill. Some of these plantations are located close to the shoreline of the lake.

3.17.1.5 Baseline Maps

The baseline for this LCT is illustrated in the following three map figures. A detailed location map is presented and this is followed by a baseline map indicating the location of proposed landscape designations, protected views and prospects. Finally, a map which presents the baseline woody vegetation cover and commercial forest cover is also presented.







3.17.2 LCT 17. Tabular Hills – Assessment of Sensitivity to Commercial Forestry

The assessment of the sensitivity of LCT 17 to commercial forestry is presented below and takes account of natural criteria (including landform, landcover, scale and landscape context), visual and perceptual criteria and indicators of landscape value such as presence of designations, protected views and promoted walking routes and heritage attractions. The presence and extent of existing commercial forestry plantations is also considered in the sensitivity assessment.

3.17.2.1 LCT 17. Tabular Hills – Landform, landcover and scale

This LCT features distinctive tabular hills which, due to their unique profile and the highly scenic skyline that they present, are deemed to be very highly sensitive to commercial forestry. The summits and higher slopes feature rough pasture and limited wooded cover which results in a relatively exposed landscape that would be sensitive to commercial forestry. At lower elevations where woody landcover is more abundant, there is some limited capacity to accommodate commercial forestry of an appropriate scale.

3.17.2.2 LCT 17. Tabular Hills – Landscape context

These hills perform an important role in forming the setting to Lough Gill. These hills also form the foreground or setting to the adjacent more elevated LCT 17 Steep Mountain Peaks. The visual relationship between this landscape and the adjacent Lough Gill and the steep mountain peaks is clearly apparent to the visitor travelling through the area. It is therefore highly sensitive to commercial forestry which could intrude upon key scenic views of this landscape and undermine the key characteristics and scenic context.



Distinctive landforms and their relationship with Doon Lough are highly sensitive to commercial forestry.

3.17.2.3 LCT 17. Tabular Hills – Visual and perceptual criteria

This LCT is remote and very tranquil away from roads. The LCT is a transition landscape between the steep mountain peaks further north and the lake landscape of Lough Gill and forms the setting for many scenic views towards mountain skyline and lakeland. The scenic context along with the tranquillity and sense of wildness is such that this LCT is very highly sensitive to commercial forestry. Commercial forestry would be

at variance with the character of the landscape and could potentially undermine the sense of wildness and tranquillity in many scenic views.

3.17.2.4 LCT 17. Tabular Hills – Landscape Value

Almost all of the LCT is designated as AONB and this reflects the outstanding landscape quality and scenic quality of the area. The landscape of hills also forms the backdrop to protected views of Lough Gill referenced in the baseline above. The area is enjoyed by visitors and locals with available local walking routes and promoted viewing points and heritage points of interest such as Parkes Castle on the shoreline of Lough Gill. These heritage attractions are indicative of a highly valued landscape which would be sensitive to commercial forestry.

3.17.2.5 LCT 17. Tabular Hills – Sensitivity ranking

This LCT is considered to be of **very high** sensitivity to commercial forestry. Nearly all this LCT falls within the proposed AONB designation A4 Lough Gill, Lissan Mountain and Environs. A total of 4 proposed views and prospects are located within the LCT. These are focused on Doon Lough and Lough Gill with the backdrop of the tabular hills landscape. These aspects reflect the scenic quality of this transitional landscape and its importance as the setting for the mountain skylines further north and the setting of Lough Gill to the south.



The tabular hills overlook Lough Gill and the mountains further south west including Killery Mountain in Co. Sligo. Commercial forestry is not recommended in these areas.

4 CAPACITY STUDY AND DESIGN GUIDANCE SUMMARY

The landscape capacity study has considered the sensitivity of all the LCTs with summary findings tabulated below.

Table 4-1: Landscape Sensitivity - Study Findings

ID	Name	Sensitivity	Capacity for commercial forestry
LCT 1	Coastal Plain	Very High	None
LCT 2	Coastal Drumlin Farmland	High	Limited
LCT 3	Wooded Lakeside Farmland	High	Limited
LCT 4	Cliffed Uplands and Landslips	Very High	None
LCT 5	Moorland Plateau	Very High	None
LCT 6	Moorland Hills	High	Very limited capacity at higher elevations and on steep sided mountain slopes.
LCT 7	Upland Farmland and Foothills	Medium to High	Yes
LCT 8	Valley Farmland	High	Very Limited
LCT 9	Drumlin Farmland	Low	Yes
LCT 10	Major Loughs	Not applicable	Not applicable
LCT 11	Drumlin Loughs and Stream Margins	Very High	None
LCT 12	River Floodplain	Very High	None
LCT 13	Low Limestone Outcrops	Very High	None
LCT 14	Drumlin Farmland with Peat Bogs	Low	Yes
LCT 15	Undulating Hill Farmland	Low	Yes
LCT 16	Steep Mountain Peaks	Very High	None
LCT 17	Tabular Hills	Very High	None

4.1 LCTs recommended for exclusion from future commercial forestry

The landscape capacity study recommends the exclusion of 8 LCTs from consideration for future commercial forestry. These are deemed to have no capacity for further planting for the reasons outlined below. Additionally LCT 10, comprised entirely of waterbodies is excluded. The lakes are important landscape features which have been considered in this landscape capacity study in the context of the adjacent LCTs.

4.1.1 LCT 1. Coastal Plain

LCT 1 Coastal Plain is considered to have no capacity for commercial forestry due to the highly scenic and sensitive nature of this landscape and the visual relationship with the coastline and Donegal Bay.

4.1.2 LCT 4. Cliffed Uplands and Landslips

LCT 4 Cliffed Uplands and Landslips is considered to have no capacity for commercial forestry due to the highly scenic and sensitive nature of this landscape and its importance in mountain skylines viewed from many locations. Furthermore it is unlikely to be considered for this purpose for practical reasons.

Guidelines in terms of the siting and design of future commercial forest plantations, outlined for adjacent LCTs, in particular, LCT 6 Moorland Hills, LCT 7 Upland Farmland and Foothills and LCT 8 Valley Farmland must take account of the particular sensitivities of LCT 4 Cliffed Uplands and Landslips.

4.1.3 LCT 5. Moorland Plateau

LCT 5 Moorland Plateau is considered to have no capacity for commercial forestry due to the highly scenic and sensitive nature of this landscape and its importance in mountain views experienced from many locations. Furthermore it is unlikely to be considered for this purpose for practical reasons.

Guidelines in terms of the siting and design of commercial forest plantations, outlined for adjacent LCTs, in particular, LCT 6 Moorland Hills, LCT 7 Upland Farmland and Foothills and LCT 8 Valley Farmland must take account of the particular sensitivities of LCT 5 Moorland Plateau. In this regard, LCT 5 is to be avoided and a careful approach to the siting and design of commercial forestry plantings in the adjacent lower lying LCTs will have regard for the sensitivities of this moorland plateau LCT.

4.1.4 LCT 11. Drumlin Loughs and Stream Margins

LCT 11 Drumlin Lough and Stream Margins is considered to have no capacity for commercial forestry due to the highly scenic and sensitive nature of this landscape and its visual relationship to the various rivers and lakes within.

4.1.5 LCT 12. River Floodplain

LCT 12 River Floodplain is considered to have no capacity for commercial forestry due to the highly scenic and sensitive nature of this landscape and its visual relationship to the river, promontories, crannogs and islands along with the overall high levels of tranquillity.

4.1.6 LCT 13. Low Limestone Outcrops

LCT 13 Low Limestone Outcrops is considered to have no capacity for commercial forestry due to the highly scenic and sensitive nature of this landscape comprise of distinctive hills which are important focal points in views from the surrounding lowlands.

4.1.7 LCT 16. Steep Mountain Peaks

LCT 16 Steep Mountain peaks is considered to have no capacity for commercial forestry due to the highly scenic and sensitive nature of this landscape comprise of complex and distinctive mountain and hill landforms which present as important focal points in views from the surrounding areas.

4.1.8 LCT 17. Tabular Hills

LCT 17 Tabular Hills is considered to have no capacity for commercial forestry due to the highly scenic and sensitive nature of this landscape comprised of distinctive hills which also form the setting to Lough Gill. High levels of tranquillity contribute to the outstanding scenic quality of this area.

4.2 Siting and design of commercial forestry - guidelines

Guidelines for the siting and design of commercial forestry is outlined in this section of the report for the LCTs which are considered to have varying capacity to accommodate future planting of this type. A map summary of the capacity findings is presented below in Figure 4.1 Leitrim Landscape Capacity for Commercial Forestry.

The map indicates the LCTs which are considered to have no capacity for commercial forestry as follows:

- LCT 1 Coastal Plain;
- LCT 4 Clifed Uplands and Landslips;
- LCT 5 Moorland Plateaus;
- LCT 10 Major Loughs (excluded as waterbodies);
- LCT 11 Drumlin Loughs and Stream Margins;

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- LCT 12 River Floodplain;
- LCT 13 Low Limestone Outcrops;
- LCT 16 Steep Mountain peaks; and
- LCT 17 Tabular Hills.

The landscape capacity study concludes the following LCTs to have some capacity for commercial forestry as follows and as illustrated in Figure 4.1 above:

- LCT 2 Coastal Drumlin Farmland;
- LCT 3 Wooded Lakeside Farmland;
- LCT 6 Moorland Hills;
- LCT 7 Upland Farmland and Foothills;
- LCT 8 Valley Farmland;
- LCT 9 Drumlin Farmland;
- LCT 14 Drumlin Farmland with Peat Bogs; and
- LCT 15 Undulating Hill Farmland.

The landscape capacity study recommends the following general guidance for the LCTs listed above which are considered to have some capacity for commercial forestry:

- The layout or shape of commercial forestry plantations often presents as a geometric block. This results in adverse visual impacts especially where present on mountain sides. Future commercial forests should avoid angular geometric outlines. Instead, forest edges should have sinuous outlines and curved corners. Forests should be shaped to have projections and recesses.
- The creation of areas of open space within the canopy is especially important for commercial forests located on hill or mountain sides. Areas within the plot should be left unplanted for diversity;
- Commercial forest plantations should be linked to surrounding landscape elements, for example, adjacent areas of deciduous woodland and hedgerows;
- Commercial forestry planting should ideally be set back from the edges of roads and tracks in order to maintain scenic diversity from these routes. The planting should be set back on one or both sides of the road at varying distances;
- The planting of native deciduous species outliers is recommended to provide colour contrast to offset the often dark green monochrome colour of a commercial conifer plantation. These can take the form of a randomly spaced native deciduous trees which appear loosely scattered thereby providing a natural or diffuse edge instead of a geometric boundary;
- Commercial forestry plantings should merge with existing deciduous woodlands where present and should feature deciduous native species outliers to mask the dark green monochrome conifer planting and to integrate same into an existing wooded setting. Outliers should comprise similar native species to that occurring in the nearby deciduous woodlands;
- The margins of loughs along with areas of heathland and bog should be avoided;
- Commercial forestry should be set back from the edges of rivers and streams at varying distances. The plantations should assume a natural and informal layout. The planting of native riparian species at the forest edges is recommended in the vicinity of watercourses. Proximity to rivers and watercourses to be considered on a case by case basis, having regard for landscape and ecological sensitivities at a local level Further detailed design in the vicinity of catchments should be guided by an ecologist on a case by case basis;
- The siting and design of proposed commercial forestry needs to carefully consider walking routes and the maintenance of scenic diversity and openness of scenic views of mountains, valleys and lakes; and
- The siting and design of commercial forestry will need to carefully consider existing commercial forestry plantations in order to avoid adverse cumulative effects on landscape character and visual amenity.

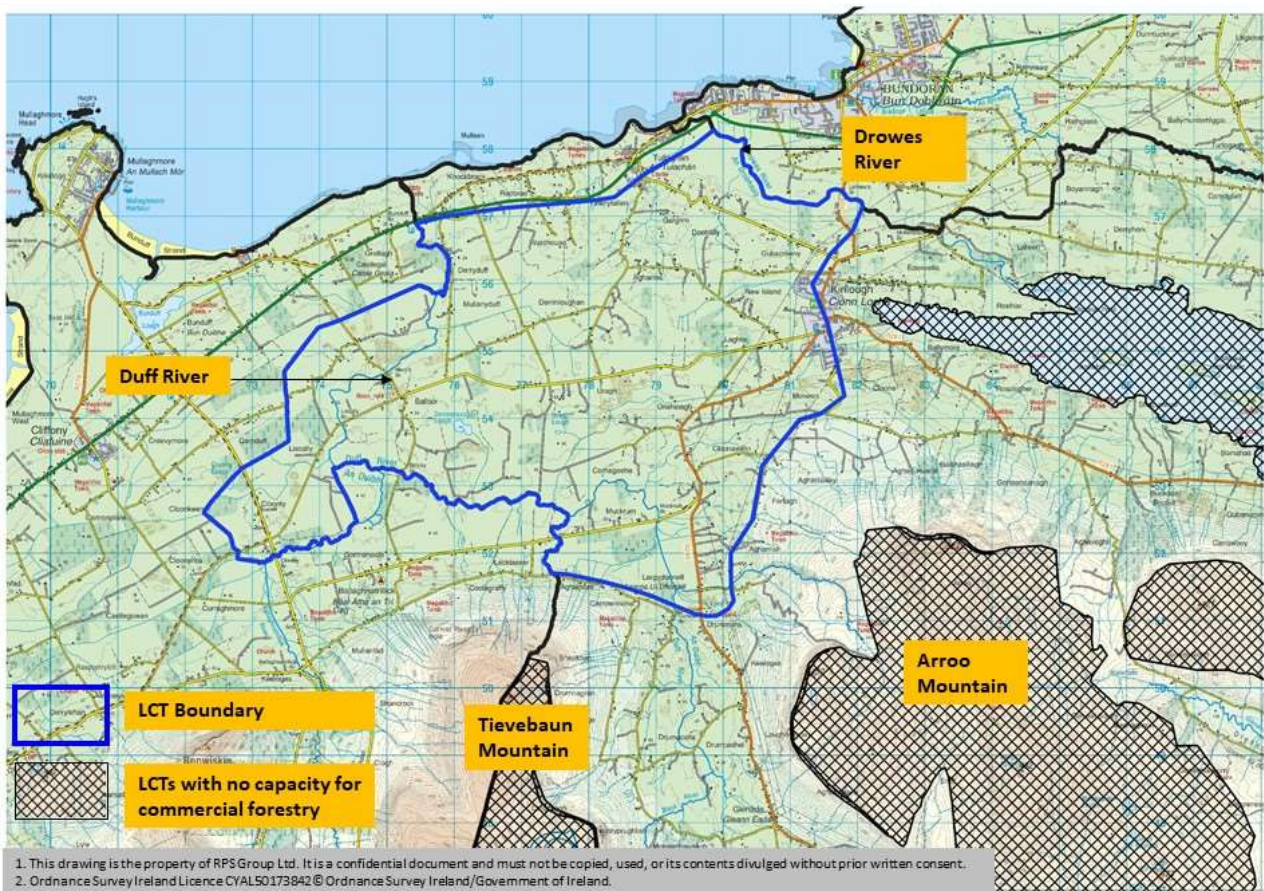
4.2.1 Siting and design of commercial forestry – specific guidance for each LCT

Specific guidance is outlined below for each LCT which is considered to have capacity for commercial forestry. Some of the location specific guidance is indicated in supporting map extracts also presented below.

4.2.1.1 LCT 2. Coastal Drumlin Farmland – Capacity for commercial forestry and design guidance

LCT 2 Coastal Drumlin Farmland is considered to have limited capacity for further commercial forestry. Guidelines in terms of the siting and design of commercial forest plantations in this LCT are as follows:

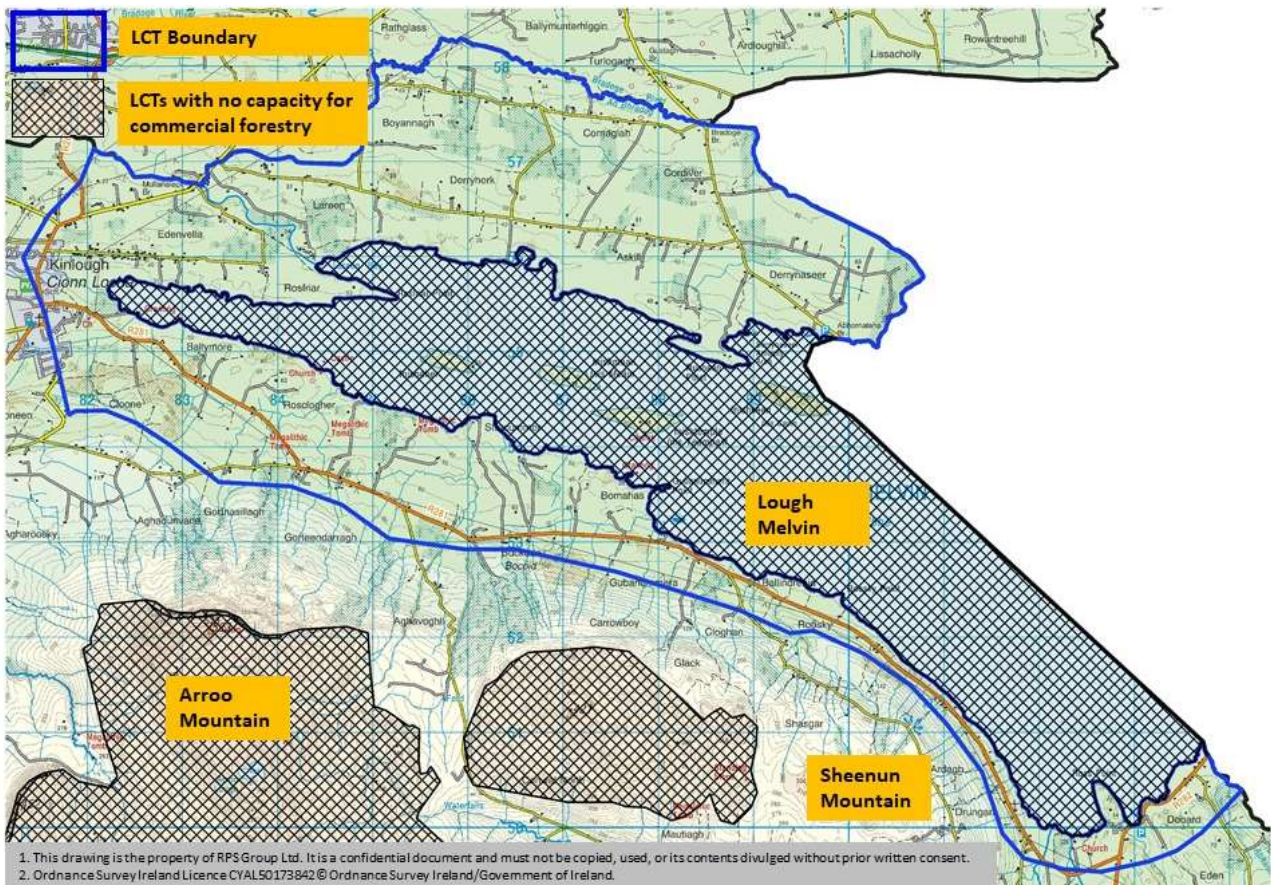
- Commercial forestry planting is not recommended in open areas which form the setting of, and are visually linked to the mountains further south including the Arroo and Tievebaun mountain ranges;
- A very limited amount of small scale plantations may be accommodated in the isolated locations where transitional woodland scrub is present. Plantings should be merged with native species scrub in order that the native species would provide some screening of the commercial forestry thereby integrating same into the landscape;
- The introduction of commercial forestry planting will have to consider the mature height of the planting in order that this would not obstruct scenic mountain views. Plantings are to be sited in a manner that preserves protected views within this LCT; and
- Areas within the immediate vicinity of the Duff River, the Drowes River and tributaries are to be avoided. Proximity to rivers and watercourses to be considered on a case by case basis as referenced in the general guidance above.



4.2.1.2 LCT 3. Wooded Lakeside Farmland – Capacity for commercial forestry and design guidance

LCT 3 Wooded Lakeside Farmland is considered to have limited capacity for further commercial forestry. Guidelines in terms of the siting and design of commercial forest plantations in this LCT are as follows:

- Care will be needed to avoid adverse cumulative effects with existing commercial forestry which, when combined with new plantings, could become the dominant landcover thereby eroding key landcover characteristics associated with the original landscape character.
- Areas in the vicinity of Lough Melvin and the Arroo Mountain Range and Sheenun are especially sensitive. Any commercial forestry planting should take account of the views and intervisibility between lake and mountain in this area;
- The lake margins are to be avoided where possible. A careful approach to the siting and design of commercial forestry will be required on the northern side of Lough Melvin in order to maintain views of the lake and mountain skylines of Sheenun and Arroo Mountain; and
- Plantings are to be sited in a manner that preserves existing views of Lough Melvin. Plantings are to be sited in a manner that preserves protected views within this LCT along with the protected views outside of this LCT which are focussed on the lake.



4.2.1.3 LCT 6. Moorland Hills, LCT 7. Upland Farmland and Foothills and LCT 8. Valley Farmland – Capacity for commercial forestry and design guidance

LCT 6. Moorland Hills, LCT 7. Upland Farmland and Foothills, and LCT 8. Valley Farmland are very closely related along with LCTs 4 and 5 (not recommended for commercial forestry). The context for each LCT lies in the adjacent LCTs at higher and lower elevations and this is due to the nature of the landscape in North Leitrim where all of these LCTs combine to present as one mountain and glen landscape. Thus the mountain skylines with cliffs (LCT 4) and moorland plateau (LCT 5) sweep down along steep mountain sides onto moorland hills (LCT 6) and further down along the smooth glens with upland farmland (LCT 7) and further down to the valley floor (LCT 8). The design guidelines are therefore very strongly influenced by the overall context for each LCT and its relationship to adjacent LCTs. The guidance in terms of the siting and design of commercial forest plantations that apply collectively to LCT 6, LCT 7 and LCT 8 are outlined below:

- Careful siting and design of commercial forestry is required in the more sensitive areas of North Leitrim. This includes the Glenaniff Valley between the Arroo Mountain Range and Sheenun where the introduction of commercial forestry would need to have regard for maintaining the character of the sweeping valley and the characteristic floodplain associated with this river valley. Small scale forests may be accommodated at lowest elevations where these tie in with existing broadleaf and riparian woodlands;
- The areas of this LCT that overlook the Glenade and Glencar valleys are to be avoided in the interests of the high scenic quality associated with these areas as reflected in the AONB designation. These valleys are among the most sensitive areas of this LCT to commercial forestry because of their scenic quality, sense of remoteness and dramatic location as foreground to nearby mountains. Commercial forestry would be in contrast with the open and elemental character and would mask the steep rugged valley sides and obstruct views of mountain skylines; and
- Many road routes, pass through LCT 7 and 8 in particular, extending along the length of the various valley landscapes. The introduction of commercial forestry planting within these landscapes generally should have regard for the maintenance of the protected views and prospects along with the general scenic diversity and mountain skylines enjoyed from these routes.

Guidance specific to each of the individual LCTs 6, 7 and 8 are outlined in the following sections.

4.2.1.3.1 LCT 6. Moorland Hills – Capacity for commercial forestry and design guidance

LCT 6. Moorland Hills is considered to have very limited capacity for further commercial forestry at higher elevations. Guidelines in terms of the siting and design of commercial forest plantations in this LCT are as follows:

- The more elevated areas of this LCT are to be avoided. These include the steep moorland slopes associated with Tievebaun, Benbo Mountain, the Arroo Mountain range, The Doons and Crockauns and Slieve Anierin in particular. These steep slopes should be kept open in order to conserve their landscape character and the mountain skylines of the adjacent Moorland Plateau LCT 5 and the Clifed Uplands and Landslips. Note earlier guidance regarding the exclusion of LCT 4 and 5 from future commercial forestry planting;
- The glacial corries and steep mountain sides of Tievebaun and Truskmore are not recommended for commercial forestry;
- The ridgeline of Sheenun should be kept clear of commercial forestry planting as it forms an important backdrop to Lough Melvin;
- Areas within the vicinity of the Black and Duff Rivers are to be avoided. Proximity to rivers and watercourses to be considered on a case by case basis as referenced in the general guidance above;
- Commercial forestry may be accommodated at lower elevations on lower hill slopes typically below the 200m contour line within landscapes which feature smooth flowing simple landforms;
- Small hills with distinctive or complex landform should be avoided such as Sheenun and Crocknagapple;
- Commercial forestry should be sited away from watercourses and associated floodplains where these present as key features in the local landscape;

- Careful siting and design of commercial forestry is required in proximity to roads and tracks in order to maintain scenic views, for example views towards Benbo from O'Donnell's Rock (V17) and views of Benbo from the town of Manorhamilton. Plantings are to be sited in a manner that preserves protected views which are focussed on landscapes and features within this LCT; and
- The cumulative effects of multiple commercial forestry plantations within this LCT needs careful consideration especially in the vicinity of Dough Mountain, The Boleybrack Mountains and the south facing slopes of Slieve Anierin.

4.2.1.3.2 LCT 7. Upland Farmland and Foothills – Capacity for commercial forestry and design guidance

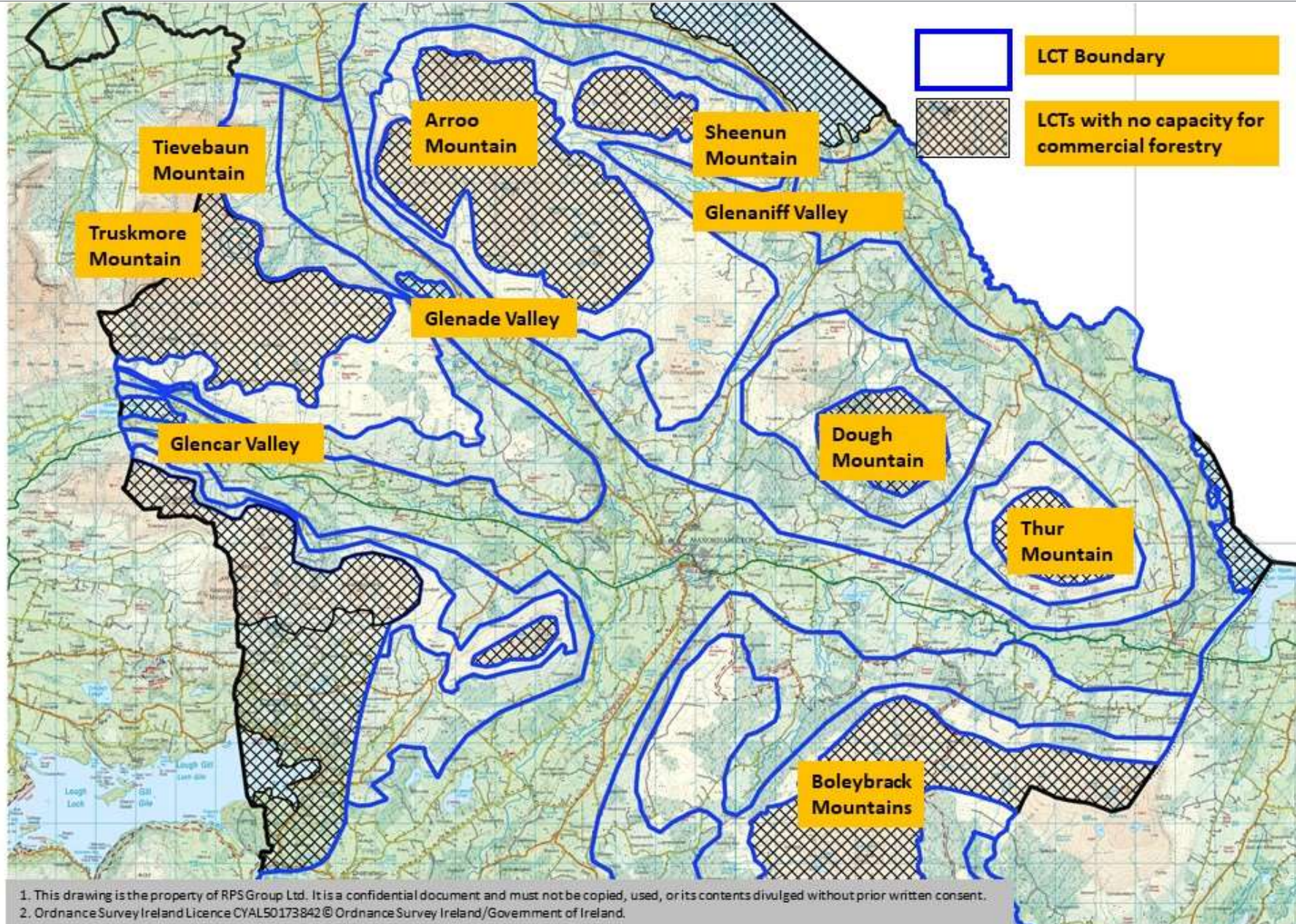
Guidelines in terms of the siting and design of commercial forest plantations in this LCT are as follows:

- Commercial forestry of appropriate scale may be accommodated within lower lying farmland areas within this LCT however this will need to have regard for the maintenance of field patterns where these present strongly in the pastoral landscape;
- The introduction of commercial forestry planting will have to consider the mature height of the planting in order that this would not obstruct scenic mountain views. Plantings are to be sited in a manner that preserves protected views which are focussed on landscapes and features within this LCT and adjacent LCTs;
- Areas within the setting of lakes and rivers, including the Rivers Ballagh and Cornavannoge are to be avoided. Proximity to rivers and watercourses to be considered on a case by case basis as referenced in the general guidance above;
- Benbo is an important focal point in views from the town of Manorhamilton and surrounding area which are to be safeguarded; and
- The cumulative effects of multiple commercial forestry plantations within this LCT will need careful consideration especially in the vicinity of Dough Mountain, The Boleybrack Mountains, the south facing slopes of Slieve Anierin and Saddle Hill.

4.2.1.3.3 LCT 8. Valley Farmland – Capacity for commercial forestry and design guidance

Guidelines in terms of the siting and design of commercial forest plantations in this LCT are outlined below:

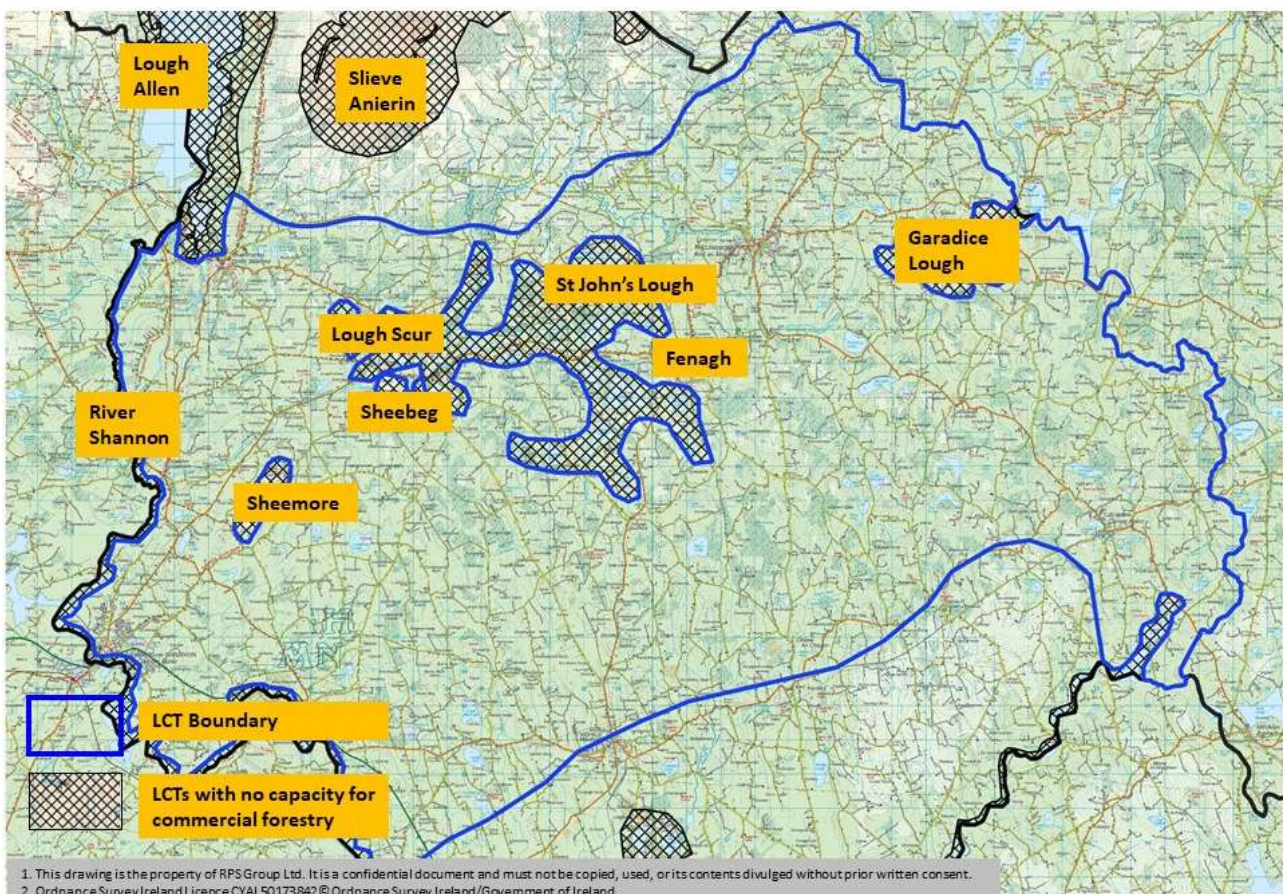
- There is very limited scope overall for the introduction of new commercial forestry planting within this LCT. Future plantations of modest scale may be considered on a case by case basis and will have to be carefully designed such that, at maturity, scenic views of the wider glen landscape and the mountain skylines would not be obstructed. Plantings are to be sited in a manner that preserves protected views which are focussed on landscapes and features within this LCT and adjacent LCTs
- Commercial forestry of appropriate scale may be accommodated within lower lying farmland areas within this LCT however this will need to have regard for the maintenance of field patterns where these present strongly in the pastoral landscape;
- Areas of this landscape within the setting of lakes such as Belhavel Lake and Lough Allen are sensitive and are to be avoided;
- The siting and design of commercial forestry needs to have regard for the landscape setting of important heritage assets including Creevelea Abbey;
- Areas within the setting of lakes and rivers, including the Rivers Bonet, Glenaniff, Shanvaus and Cornavannoge are to be avoided. Proximity to rivers and watercourses to be considered on a case by case basis as referenced in the general guidance above; and
- The cumulative effects of multiple commercial forestry plantations within this LCT will need careful consideration especially in the vicinity of The Boleybrack Mountains and Corry Mountain.



4.2.1.4 LCT 9. Drumlin Farmland – Capacity for commercial forestry and design guidance

Guidelines in terms of the siting and design of commercial forest plantations in this LCT are as follows:

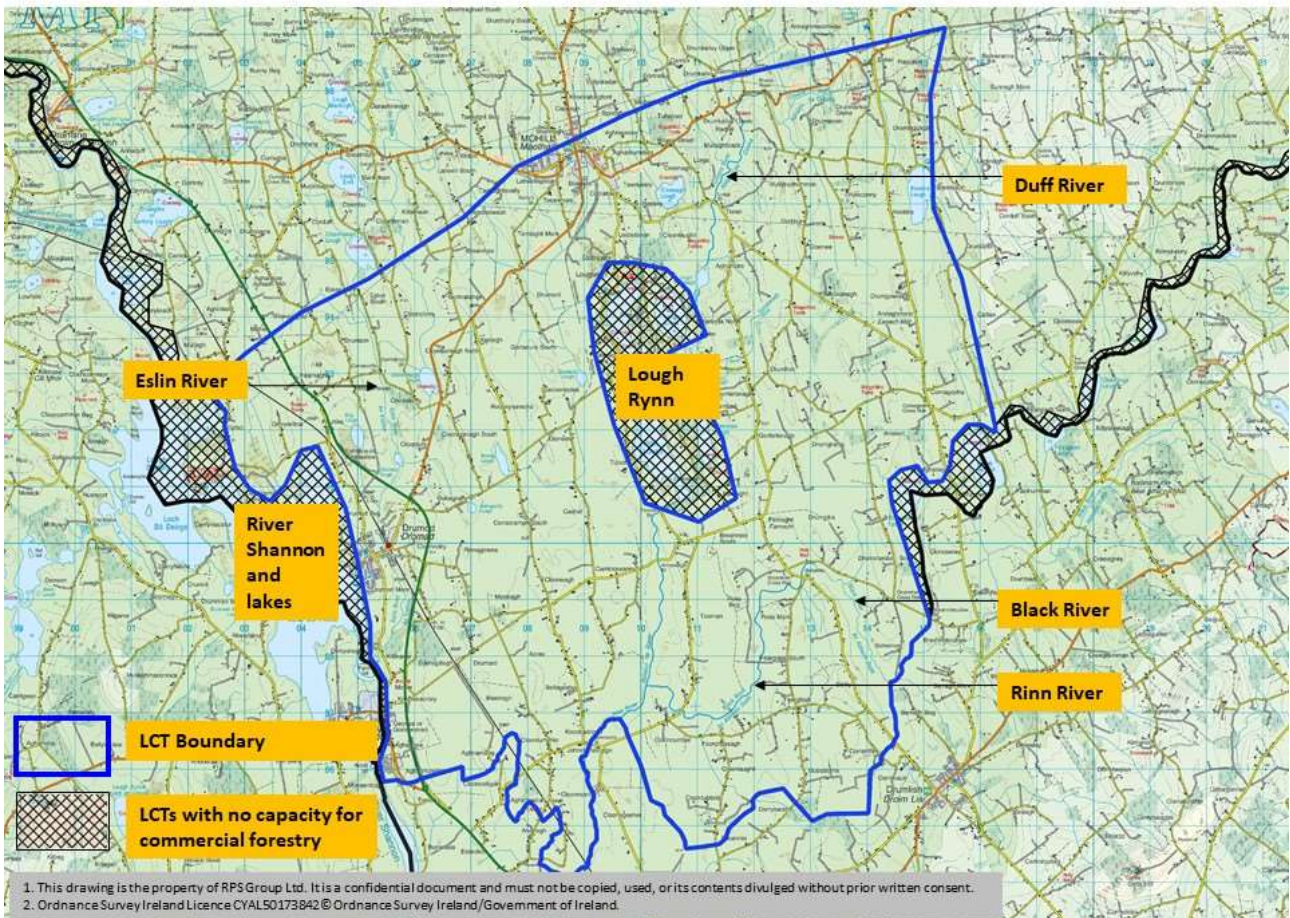
- Subtle integration of commercial forestry plantings into existing wooded landscapes is recommended in order to preserve the pastoral drumlin hills as a key characteristic;
- Areas within the setting of lakes and rivers, including the River Shannon and Lough Allen are to be avoided. Proximity to rivers and watercourses to be considered on a case by case basis as referenced in the general guidance above;
- Areas within the setting of Sheemore and Sheebeg are to be avoided. Commercial forestry would mask views of these distinctive hills and also undermine their wider setting in an expansive lowland landscape;
- Commercial forestry planting should be carefully sited and designed to maintain views towards Slieve Anierin from the local landscape including that near Eslinbridge;
- Limit further commercial forestry planting on the south facing slopes of Slieve Anierin in order to avoid adverse cumulative effects;
- Areas within the setting of Fenagh, including lake, Abbey ruins and other features of historical interest are to be avoided; and
- Plantings are to be sited in a manner that preserves existing views of Slieve Anierin along with the protected views within this LCT. Plantings are to be sited in a manner that preserves protected views which are focussed on landscapes and features within this LCT and adjacent LCTs.



4.2.1.5 LCT 14. Drumlin Farmland with Peat Bogs – Capacity for commercial forestry and design guidance

Guidelines in terms of the siting and design of commercial forest plantations in this LCT are as follows:

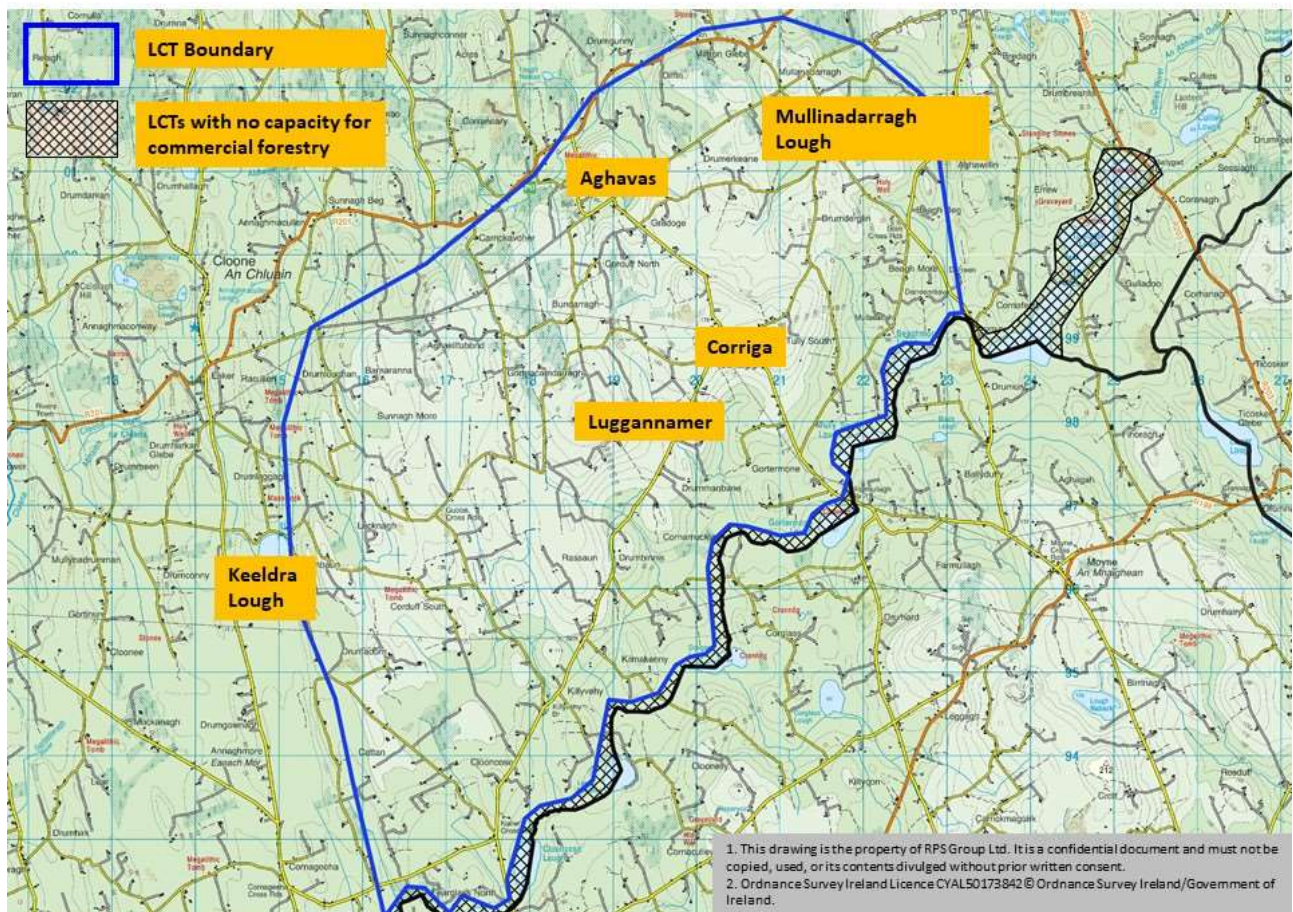
- Careful siting and design of commercial forestry planting will be required in terms of the scale and extent of planting in order to avoid adverse cumulative effects with existing commercial forestry, in the northern part of this LCT;
- The siting and design of commercial forestry will take account of the need to maintain pastoral landcover and field pattern where present as dominant key characteristic of the landscape at a local level;
- Commercial forestry planting should ideally be set back from the edges of roads and tracks in order to maintain scenic diversity. This is especially important in this relatively flat LCT in which views from the road or track are of very short range and often focused on the nearest farmed fields;
- The immediate vicinity of the lakes along the River Shannon together with Creenagh Lough, Keeldra Lough, Roosky Lough and a number of other small water bodies is to be avoided;
- Areas in the immediately vicinity of Lough Rynn in the adjacent LCT 11 are to be avoided; and
- Areas within the immediate vicinity of the Shannon River, the Black River, the Rinn River, the Eslin River, the Cloone River and tributaries are to be avoided. Proximity to rivers and watercourses to be considered on a case by case basis as referenced in the general guidance above.



4.2.1.6 LCT 15. Undulating Hill Farmland – Capacity for commercial forestry and design guidance

Guidelines in terms of the siting and design of commercial forest plantations in this LCT are as follows:

- The ridgeline and the most elevated areas of this LCT are to be avoided. The ridgeline extends in a broadly east west direction through the townlands of Lugganammer, Corduff North and Corrigo. Commercial forestry is to be sited at lower elevations in order not to be visually prominent in views of the ridgeline;
- Careful siting and design of commercial forestry planting is required in terms of the scale and extent of commercial forestry in order to avoid adverse cumulative effects with existing planting especially in the north of the LCT in the vicinity of Aghavas;
- The siting and design of commercial forestry must take account of the need to maintain pastoral landcover and field pattern strongly defined by mature hedgerows where present as dominant key characteristic of the landscape at a local level;
- Future commercial forestry planting is to be sited carefully in order not to obstruct views of elevated ridgelines to the south in County Longford and views of the mountains in North Leitrim; and
- Areas in close proximity to streams are to be avoided together with areas in the immediate vicinity of Keeldra lake in the adjacent LCT and Mullinadarragh Lough within this LCT. Proximity to rivers and watercourses to be considered on a case by case basis as referenced in the general guidance above.



Appendix A

Designated Nature Sites

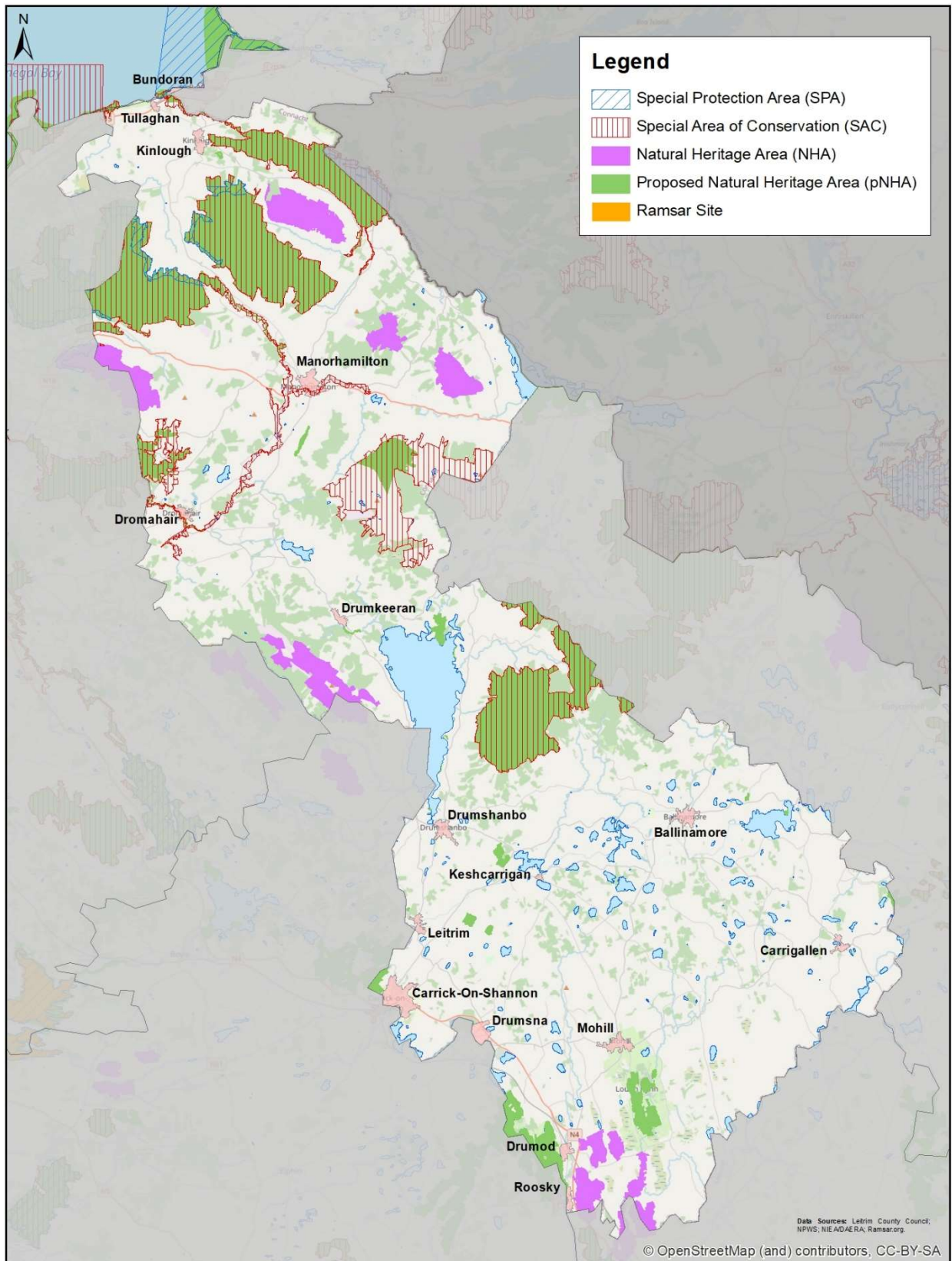


Figure 3.5
Designated Nature Sites

Project
Leitrim Landscape Capacity Study
for Commercial Forestry

Client
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Leitrim County Council

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