

*Leitrim County Development Plan 2022-2028*  
*Chief Executive's Report - Pre Draft Consultation Stage*



Submitted to Elected Members on 7<sup>th</sup> October 2020



Leitrim County Council  
Comhairle Chontae Liatroma





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## 1. Review of County Development Plan

### 1.1 Introduction

In accordance with Section 11 of Planning Act 2000, as amended, Leitrim County Council commenced the review of the Leitrim County Development Plan 2015-2021 and the preparation of the new Leitrim County Development Plan 2022-2028 by way of publication of notice of its intention to review the existing plan and prepare a new plan on **Wednesday 17<sup>th</sup> June 2020**.

The notice of intention was given to the Minister for Housing, Local Government and Heritage, the Northern & Western Regional Assembly (NWRA), the Office of the Planning Regulator (OPR), Prescribed Authorities, adjoining Planning Authorities and the Local Community & Development Committee within the functional area of the Local Authority. The notice of intention was published in the Leitrim Observer and on the Leitrim County Council website in addition to being referred to in other social media platforms used by the Local Authority. The notice stated / indicated:

- that Leitrim County Council intends to review our existing development plan and to prepare a new development plan,
- indicated that submissions or observations regarding objectives and policies to deliver an overall strategy for the proper planning and sustainable development of the area of the development plan may be made in writing to the Planning Authority within a specified period (which shall not be less than 8 weeks),
- that children, or groups or associations representing the interests of children, are entitled to make submissions or observations,
- that the Planning Authority intends to review the zoning of the area of the development plan and indicate that requests or proposals for zoning of particular land for any purpose shall not be considered at this stage and,
- the time during which and the place or places where any background papers or draft proposals (if any) regarding the review of the existing plan and the preparation of the new development plan could be inspected.

The pre-draft consultation stage ran for just over 8 weeks from **Wednesday 17<sup>th</sup> June 2020** until **Wednesday 12<sup>th</sup> August 2020**. The aim of the consultation process was to enable the public and interested parties to give their observations on the review of the existing development plan and the preparation of the new development plan, including what planning issues the new County Development Plan should address. The extent of public consultation was affected by the Covid 19 public health measures which were in place during the June – August period recalling that the offices of the Local Authority were closed when the consultation period began with scheduled appointments only to the Planning Department being facilitated. The public library service was also operating at a very limited capacity during the consultation period. Nonetheless, the consultation process included the following:

- Advertisements in local print media (Leitrim Observer).
- Notification on Council's website, Facebook page and Twitter feed.
- Placing of Strategic Issues Paper on display in the libraries that were open.
- Distribution of '*Leitrim County Development Plan 2022-2028 Strategic Issues Paper*' to all Council offices.
- Notification to all Elected Representatives and Prescribed Bodies.

- Notification to all known community groups via Leitrim PPN and to all sporting groups / organisations via the Leitrim Local Sports Partnership.
- Notification to all known infrastructure providers.
- Holding of public meetings in Ballinamore, Carrick on Shannon and Manorhamilton.

A total of 45 written submissions were received within the statutory time period. A list of these submissions is included in Appendix 1. All written submissions are considered in this report; **however, any submission or any part of a submission relating to a request or proposals for zoning of particular land for any purpose does not appear in this report.** There are 2 such submissions in this regard (submission no. 01/21 and 01/22) which were not considered at this time. Appendix 2 indicates all of the Statutory Bodies who were sent notice of the review of the County Development Plan and the preparation of the new County Development Plan. Appendix 3 indicates all of the other stakeholders who were also informed of the review of the County Development Plan.

All submissions have been scanned and have been available for public viewing on Leitrim County Council’s website as required under statute. The submissions will continue to be available for viewing for the duration of this process.

## 1.2 Public Consultation Events

Three public meetings were advertised in the Leitrim Observer on Wednesday 15<sup>th</sup> July 2020, on the County Council website and through social media platforms inviting the public to attend information sessions regarding the development plan preparation and review process. The events were held at the following locations:

Date	Venue	Time
21 <sup>st</sup> July 2020	The Bush Hotel, Carrick on Shannon	4.00 p.m. – 9.00 p.m.
22 <sup>nd</sup> July 2020	The Bee Park Resource Centre, Manorhamilton	4.00 p.m. – 9.00 p.m.
23 <sup>rd</sup> July 2020	Ballinamore Scouts Den, Park Road.	4.00 p.m. – 9.00 p.m.

The public consultation events were held in accordance with the Covid 19 public health measures which were in effect at that time. Planning staff facilitated individual consultations with members of the public during these informal meetings. No consultation material was on display, but copies of the Strategic Issues Papers were made available to each person who attended. Members of the public were invited to review the Strategic Issues Paper and were encouraged to discuss any issues other than land use zoning matters with Planning staff. Concerns and comments were noted although members of the public were strongly advised to make written submissions before the consultation period concluded. Leitrim County Council wishes to express its appreciation to those who attended the 3 public consultation events.

## 1.3 Chief Executive’s Report

The Chief Executive’s Report is prepared and submitted in accordance with the requirements of Section 11 of the Planning and Development Act 2000, as amended (hereafter referred to as the Act).

Section 11(4) of the Act sets out the requirements in relation to the preparation of the Chief Executive's Report.

The Chief Executive's Report on submissions is required to:

- a) List the persons or bodies who made submissions or observations, as well as any persons or bodies consulted.
- b) Summarise the issues raised in the submissions and during the consultations, where appropriate but shall not refer to a submission relating to a request or proposals for zoning of particular land for any purpose.
- c) Give the opinion of the Chief Executive to the issues raised, taking in to account the proper planning and sustainable development of the area, the statutory obligations of any local authority in the area, and any relevant policies or objectives of the Government or of any Minister of the Government.
- d) State the Chief Executive's recommendations on the policies to be included in the draft development plan.

The report must also summarise the issues raised and recommendations made by the relevant Regional Assembly (in our case the Northern and Western Regional Assembly) and outline the recommendations of the Chief Executive in relation to the manner in which those issues and recommendations should be addressed in the draft development plan. The submission from the Office of the Planning Regulator has similarly been summarised and the opinion of the Chief Executive provided to the issues raised.

Having regard to the length of several of the submissions received, it was not considered practicable to include each of the points raised in each of the submissions received but rather to summarise the main points raised. These have been summarised by theme. The individual submissions will continue to be a reference document for the Planning Authority, where appropriate, in the preparation of the draft County Development Plan.

Section 5 of this report outlines the Chief Executive's recommendations on the policies to be included in the draft County Development Plan. These are strategic in nature. The recommendations are not just those which arise from consideration of the submissions received but also several recommended policies which the Planning Authority considers should be included.

It should also be qualified that these policies, subject to the Elected Members agreement or any policy directions which the Elected Members may give at this stage of the process, will be subject to further considerations as part of the Strategic Environmental Assessment and Appropriate Assessment of the draft development plan. This may result in such policies being amended or possibly discontinued.

This report is required to be submitted to the members of the Planning Authority, or to a committee of the Planning Authority, as may be decided by the Members of the Authority, for their consideration. In this instance it is being submitted to the Elected Members of Leitrim County Council.

In accordance with the Planning & Development Act 2000, as amended, this stage of the review shall be **strategic in nature** for the purposes of developing the policies to deliver an overall strategy for the proper planning and sustainable development of Co. Leitrim.

#### 1.4 Members Consideration of this Report

This report forms part of the statutory procedure for the review of the existing development plan and the preparation of the new development plan. This report is submitted to the Elected Members of Leitrim County Council for their consideration. The Members, following consideration of this report, may issue directions to the Chief Executive regarding the preparation of the draft development plan and any such directions shall be **strategic in nature** and shall take account of the statutory obligations of Leitrim County Council and any relevant policies or objectives for the time being of the Government or of any Minister of the Government. In issuing directions, Section 11 (4)(f) of the Planning and Development Act 2000, as amended, states that the Members *“shall be restricted to considering the proper planning and sustainable development of the area to which the development plan relates”*.

Any such directions must be issued **not later than 10 weeks** after the submission of this report to the Elected Members.

Following the consideration of this Chief Executive’s Report by the Elected Members and the issuing of any directions regarding the preparation of the draft development plan, a 12-week period is allotted by the Act for the preparation of a proposed draft Leitrim County Development Plan 2022-2028.



## 2. Submission from the Office of the Planning Regulator

**Submission Reference Number: 01/32**

### Introduction

The submission indicates that the OPR is obliged to evaluate and assess development plans in the context of certain statutory parameters which are then set out.

### Core Strategy & Settlement Strategy

The submission highlights that the formulation of the Core Strategy is the most significant element in developing the draft development plan and that the National Planning Framework (NPF) and the Regional Spatial & Economic Strategy (RSES) in addition to relevant specific planning policy requirements (SPPRs) specified in Ministerial guidelines will be key determinants in making the Core Strategy.

The submission emphasizes the importance of '*compact growth*' from an urban development perspective, one of the National Strategic Outcomes of the NPF and concentrating development in built up areas. National Policy Objective (NPO) 3c has a target to '*Deliver at least 30% of all new homes that are targeted in settlements other than the five Cities and their suburbs, within their existing built-up footprints*'.

The overall population target for the county is required to be consistent with the NPF Implementation Roadmap, with the projected growth of settlements also required to be consistent with the policy objectives of the NPF and the RSES concerning the distribution of population growth. The OPR agrees with the statement at Section 4.2 of the Issues Paper which states, '*At least 30% of this population growth must be delivered in Carrick on Shannon...*'. Carrick-on-Shannon must be identified as the Key Town consistent with the RSES, and that the current designations of Manorhamilton and Ballinamore as Key Towns will need to be amended in the forthcoming settlement hierarchy.

### Local Area Plans

As the current local area plan (LAP) for Carrick-on-Shannon dates from 2010, the OPR advises the prioritization of the preparation of the LAP in tandem with the preparation of the development plan if possible. In addition, as a Local Transport Plan is required to inform the Local Area Plan (in compliance with Regional Policy Objective 6.27), the OPR advises the Planning Authority to consult with the NTA, Transport Infrastructure Ireland (TII) and Roscommon County Council in this regard.

The OPR also highlights the provisions of section 9(4) of the Act in relation to the preparation of a joint Local Area Plan for Carrick on Shannon / Cortober, which states:

*"In making a development plan in accordance with this Chapter, a Planning Authority shall have regard to the development plans of adjoining planning authorities and shall co-ordinate the objectives in the development plan with the objectives in the plans of those authorities except where the Planning Authority considers it to be inappropriate or not feasible to do so."*

The OPR advises the Planning Authority to limit the number of development plan objectives requiring the preparation of a LAP, especially for the smaller towns / villages or where limited growth is anticipated.

### **Urban Regeneration**

The NPF recognises that the regeneration and rejuvenation of cities, towns and villages of all types and scale can play a role in making stronger urban places and contributing to compact growth. Acknowledging that Key Towns including Carrick-on-Shannon are targeted to have a 30% population uplift in the RSES, the development plan and LAP will need to prioritise the development of opportunity sites close to the town centre in the first instance.

The NPF supports the use of performance-based standards for infill / brownfield developments. The current development management standards dealing with residential and apartment development should be reviewed to ensure they are consistent with the relevant and any updated section 28 guidelines.

### **Economic Development & Employment**

Reacting to the Issues Paper, the OPR notes that while the current high jobs ratios in Carrick-on-Shannon places the town in a strong position to support sustainable growth, it is considered that addressing job creation and retail leakage in the smaller towns will be significant issues for the forthcoming plan. The OPR considers that the plan should be proactive in identifying sites or opportunities to support economic development and employment consistent with national, regional and local policies.

### **Transport & Infrastructure**

The Issues Paper recognises that land use planning, transportation and the provision of infrastructure are interdependent and require an integrated approach to deliver sustainable development. The integration of good land-use planning with transportation is essential for delivering reductions in the extent of our overall carbon footprint. In view of the greenhouse gas (GHG) emissions from transport and the energy use for transport, it will be essential for the Planning Authority to achieve a significant modal shift in the county in order to meet the requirements under section 10(2)(n) of the Act. The OPR encourages the inclusion of modal shift targets to be achieved over the plan period, aligned to relevant implementation measures, in order to achieve meaningful improvements in GHG emissions and energy use acknowledging the dispersed nature of the county's population.

Following the adoption of the NPF, Planning Authorities will be required to apply a standardised, tiered approach to differentiate between zoned land that is serviced and zoned land that is serviceable within the life of the plan. There is a need to work proactively with Irish Water to progress projects that deliver infrastructure for the county's settlements and support development in strategic development areas consistent with the NPF and RSES. Given the critical role that Carrick-on-Shannon will play in building critical mass and supporting sustainable growth, the OPR advises the Planning Authority to proactively engage with Irish Water to ensure that there is water supply capacity available to support development until the proposed upgrade works have been completed.

A key issue for the next development plan is to ensure that policies maximise the benefits of existing and planned public transport investment and that planned improvements to the national road network are not eroded by a growth in demand for car travel, especially for short distances, in the absence of long term public transport infrastructure. The plan should ensure that the route corridor options for the Carrick-on-Shannon bypass are protected and that local policies and development management standards regarding access to national roads including exceptional circumstances are consistent with the Spatial Planning and National Road Guidelines (2012). Commitment to the proactive implementation of the Design Manual for Urban Roads and Streets in the required locations, consistent with RPO 6.26, will

also assist sustainable and active transport modes, in addition to improvement in the street environment and overall quality of life of urban areas and settlements of all sizes.

### **Rural Development**

The OPR notes that the current development plan identifies three area types in the county in terms of their capacity to accommodate further rural housing viz. low, medium and high capacity areas and acknowledges the challenges the soil conditions pose for building one off rural houses. The new Development Plan must provide the appropriate balance between policies supporting rural housing in appropriate locations and those that proactively address issues of town / village decline and compact growth. The plan's policies will need to demonstrate consistency with NPO 19 and NPO 20 and RPO 3.3 which seeks to *'deliver at least 20% of all new housing in rural areas on brownfield sites'*. The OPR advises the Planning Authority to consider including two categories of rural area viz. areas under urban influence and areas located outside of these catchments, to inform its rural housing policies.

Furthermore, the plan will need to consider the practical implementation of appropriate policy objectives through suitable land activation approaches and proactive facilitation of the building of homes within the footprint of rural settlements through measures such as site acquisition and serviced sites consistent with NPO 18a and NPO 18b. Such initiatives have the potential to alleviate pressure on the open countryside through provision of a desirable alternative to one-off housing for families who would like to reside close to the facilities, services and amenities available in rural villages and towns whilst maintaining ties to the wider rural community.

### **Strategic Flood Risk Assessment**

The Planning Authority will need to prepare a Strategic Flood Risk Assessment (SFRA) as part of the forthcoming draft development plan, consistent with The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009).

### **Climate Action and Energy**

Having regard to the Climate Action Plan 2019 and to the objectives of the NPF and the RSES, the transition to a low carbon economy and the overall reduction in carbon emissions will become a central issue for planning policies during the preparation of the plan. The Office notes that climate change will be a cross cutting theme in the new plan and highlights a statement contained in the Issues Paper. The submission highlights climate change mitigation measures and RPOs relating to the integration of land use and transport planning contained in the RSES of relevance.

The OPR commends the Planning Authority for commissioning the preparation of a Renewable Energy Strategy to identify the potential for further renewable energy production and notes that this will form part of the draft plan.

The promotion of renewable energy sources within the county in accordance with the Section 28 Wind Energy Development Guidelines (2006), Circular Letter PL 5/2017: Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change and Wind Energy Development Guidelines 2006 – Update on Review (July 2017) , or any replacement guidelines issued by the Minister, will also be critical to ensure Ireland meets its national targets and commitments to increase renewable energy supply and reduce greenhouse gas emissions.

In this regard, the attention of the Planning Authority is drawn to the SPPR under the aforementioned interim guidelines. This requires, inter alia, that the Planning Authority indicate how the implementation

of its development 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).

### Response of the Chief Executive

The contents of the submission from the OPR have been noted and carefully considered. It is the view of the Chief Executive that the submission generally reminds the Planning Authority of our obligations as set out under Act and the need for the development plan to be consistent with the NPF and the RSES, with Guidelines issues by the Minister under Section 28 of the Act and other Ministerial policy directives. The particular emphasis placed on climate change in the submission is noted and this is a recurring theme in several submissions received.

### Core Strategy and Settlement Strategy

The Strategic Issues Paper provided a high-level summary of the intention of the Planning Authority with regard to population growth, adhering to the NPF / RSES target population growth and the challenges this will present. It also outlined a commitment to urban consolidation / compact growth. The Planning Authority acknowledged the commitment to delivering at least 30% of new homes in Carrick on Shannon (Key Town) within the existing development envelope on brownfield / infill sites. It is not the view however of this Planning Authority that such a requirement is necessarily mandated in the other towns and villages of the county. Nonetheless, suitable opportunity sites will be identified in the larger towns as the plan preparation progresses. In relation to the Settlement Hierarchy being re-arranged so that it is consistent with that contained in the RSES, this requires the renaming of Carrick on Shannon from a 'Principal Town' to a 'Key Town' with Manorhamilton and Ballinamore which were previously 'Key Towns' identified as 'Sub Regional Growth Centres'.

The top 3 tiers of the revised Settlement Hierarchy are outlined below with their respective 2016 recorded populations in brackets. Drumsna is moved from Tier 4 – Village to Tier 3 – Key Village on the basis of population growth but also the reduction in the population of Drumkeeran over the last inter censal period when it fell from 252 population to 220 population. The threshold for inclusion as a Key Village will be revised from 225 to 220 population as a result.

<b>Tier 1 - Key Town</b>	Carrick on Shannon (4,062)
<b>Tier 2A - Sub Regional Growth Centres</b>	Manorhamilton (1,466) & Ballinamore (914)
<b>Tier 2B – Support Towns</b>	Dromahair (808), Drumshanbo (902), Mohill (855) & Kinlough (1,032)
<b>Tier 3 – Key Villages</b>	Carrigallen (387), Dromod (555), Drumkeeran (220), Drumsna (240), Leitrim (594) and Tullaghan (253)



### **Local Area Plans**

The Planning Authority is conscious of the existing Local Area Plan for Carrick on Shannon having been prepared more than a decade ago and the requirements for reviewing a Local Area Plan as set out in the Act not having been adhered to. However, the normal 6 year cycle of preparing and reviewing County Development Plans was interrupted by the need to first produce the replacement to the National Spatial Strategy and then when the National Planning Framework was published to produce the replacement for the Regional Planning Guidelines, namely the Regional Spatial and Economic Strategies. The Planning Authority consulted with Roscommon County Council prior to the commencement of the preparation of our respective County Development Plans and the agreed consensus was that the respective County Development Plans would present the strategic context for the preparation of the joint Local Area Plan for the combined urban centre of Carrick on Shannon / Cortober. There are also resources issues in both of our Local Authorities which must be considered at this time. The Planning Authority will not therefore be acceding to the suggestion of the OPR and preparing the joint Local Area Plan in tandem with the Development Plan but will adhere to the requirement to prepare the Local Area Plan within 3 years of the RSES having been made (Key Priorities for Carrick on Shannon page 131). This will be informed by the preparation of a Local Transport Plan as also required under the RSES (RPO 6.27 refers). In relation to having regard to the development plan of Roscommon County Council and seeking to co-ordinate the objectives in our respective plans, Leitrim County Council have made a submission to the Roscommon County Development Plan pre-draft consultation phase and outlined our priorities in this regard. The Local Authority will continue to seek to influence policies which impact upon the combined urban centre of Carrick on Shannon / Cortober including the provision of a sustainable transport solution and other issues of mutual interest which transcend our administrative boundaries. The Planning Authority would advise that other than the preparation of a joint Local Area Plan for Carrick on Shannon / Cortober, no other Local Area Plan will be prepared for any urban centre in Co. Leitrim with the required policy framework contained within the development plan.

### **Urban Regeneration**

The comments of the OPR in relation to regeneration and rejuvenation of towns and villages are noted. It is more likely that the Local Area Plan for Carrick on Shannon / Cortober will identify opportunity sites close to the town centre rather than the development plan. The existing Development Management Standards will be reviewed to ensure that they are consistent with the relevant and updated Section 28 Guidelines relating to residential and apartment guidelines in particular and provide for the use of performance standards for infill / brownfield development.

### **Economic Development**

The comments in relation to the development plan seeking to address job creation and retail leakage in the smaller towns and identifying sites or opportunities to support economic development and employment consistent with national, regional and local policies are noted and accepted.

### **Transport & Infrastructure**

The challenge facing Co. Leitrim with regard to reducing greenhouse gas emissions from transport is significant having regard to our dispersed rural population with only Carrick on Shannon being considered 'urban' (i.e. having a population greater than 1,500 population) and the dependence on the private car for most transport trips including employment. The rate of out commuting from Co. Leitrim is also significant. The County Development Plan will include modal shift targets to be achieved over the plan period but these targets must be realistic considering our starting position in 2020, the limited public transport options available, the lack of real alternatives to the private car for travel trips beyond 1km, the lack of public infrastructure for electric car charging facilities, etc. The development plan needs

to promote extensive educational / information programmes to realise these targets. It is also considered that national incentives funded by the exchequer will also be required to assist in the realization of such targets.

The Planning Authority has already commenced dialogue with Irish Water and our own Water Services Department to ensure that the necessary piped water services are available to accommodate the planned growth and in particular the provision of adequate water supply for the Key Town of Carrick on Shannon. The new development plan will provide a tiered approach to zoning although it is not considered that this should present a significant issue in the urban centres of Co. Leitrim with regard to the scale of growth envisaged over the life of the development plan.

The County Development Plan will seek to ensure that any route corridor options which emerge for Carrick on Shannon are protected once the current design process which is underway has decided upon the preferred sustainable transport solution. This process will proceed in tandem with the preparation of the development plan. The policy framework will also ensure that the requirements of the Spatial Planning and National Road Guidelines (2012) are adhered to including the identification of exceptional circumstances regarding access points onto the national road network. The new County Development Plan will also commit to the proactive implementation of the Design Manual for Urban Roads and Streets (as revised), assisting sustainable and active transport modes and improvements generally to the street environment and overall quality of life of urban areas and settlements. The projects presently underway in Carrick on Shannon, Ballinamore and Manorhamilton are testament to the Local Authority's commitment in this regard.

### **Rural Development**

The Planning Authority outlined the intention to review the existing three areas types and its replacement with a simplified local housing need differentiating between areas under the influence of large urban centres such as Carrick on Shannon and Sligo from the remainder of the County. The OPR has advised the undertaking of such an approach and this is welcomed. It is disappointing that the OPR failed to acknowledge the underlying issue of poor soil percolation within their submission as this is considered a more significant challenge of sustaining appropriate rural development than adherence to a local need based on social and economic ties to an area. The Planning Authority is committed to implementing 20% of all new housing in rural areas on brownfield sites although concerned about the longevity of such an approach. It is the view of the Planning Authority that the bringing back to use of redundant dwellings by refurbishment, upgrading and extension should also be included in achieving this 20% as such an approach is more sustainable from an energy / aggregate consumption perspective than replacement. The Council are also committed to the suggested land activation measures outlined in the submission in relation to the acquisition and servicing of sites in rural settlements (Key Villages, Villages and Graigs). The provision of financial assistance from the Government will be critical in this regard.

### **Strategic Flood Risk Assessment**

The Planning Authority are preparing a Strategic Flood Risk Assessment (SFRA) as part of the draft development plan, consistent with The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009). This will inform land use zoning decisions in the County Development Plan and subsequent Local Area Plan for Carrick on Shannon / Cortober to ensure that land uses sensitive to the effects of flooding are avoided in areas at risk of flooding.

### Climate Action and Energy

The Planning Authority is fully cognizant of the need to transition to a low carbon economy and the overall reduction in carbon emissions which will become a central issue for planning policies during the preparation of the development plan. The Planning Authority have completed the preparation of a draft Renewable Energy Strategy in advance of commencing the preparation of the draft County Development Plan conscious of these requirements. The draft Renewable Energy Strategy has identified the potential for further renewable energy production. The draft Renewable Energy Strategy was subsequently revised to ensure that it complies with the most recent draft Wind Energy Development Guidelines in relation to identifying the potential wind energy resource available (in megawatts). This has been strengthened by the consideration of the landscape capacity to absorb additional wind energy projects conscious of the increasing size and scale of turbines and that opportunities to site such development in less sensitive locations with the required wind speeds may have been already provided for.

#### Recommendation of the Chief Executive

A series of policies are included in Section 5 which give effect to several suggestions contained in the submission from the OPR. Where these policies emanate from the NPF and RSES, this is clearly stated.

### 3. Submission from the Northern and Western Regional Assembly

#### Submission Reference Number: 01/04

#### Introduction

The submission outlines the legal obligation on the Planning Authority to ensure that the County Development Plan is consistent with the RSES thus ensuring full alignment between local, regional and national planning policy. The submission provides background to the making of the RSES, the guiding principles which shape it and the components of the strategy that will deliver economic development and job creation. The vision is for a region that is smarter, greener, more specialized and connected, with a stronger and more compact urban network focusing on 'People' and 'Places'. It brings a new '*place based*' approach that involves tapping into the economic potential that remains unused, so that all parts of regions, be they cities, towns or their rural hinterlands, can contribute to national development. Investment in the creation of '*place*' is key to delivering the key elements that inform business location choices.

#### Settlement Strategy

The settlement strategy is summarized highlighting the role of Key Towns such as Carrick on Shannon which provides a regionally strategic employment development of significant scale and also provide functions and services to an entire sub region, in this instance south Leitrim / east Roscommon. The target of providing 30% population growth of Carrick on Shannon is highlighted which should be supported with employment growth and increased service provision. The RSES sets out the future priorities for Carrick on Shannon including the need to prepare a joint Local Area Plan with Roscommon County Council.

The draft Development Plan should also include measures to prioritise a programme for serviced sites to be provided in selected settlements (RPO 3.7) which is now included in the Programme for Government. The high level of housing vacancy generally in Co. Leitrim is highlighted and the need to comply with the requirements of RPO 3.3 which sets a target of 20% delivery on brownfield sites in rural areas. This needs to be considered in a wider reflection of the rural nature of settlement patterns across the county and a balance between the needs of all places, including rural towns and villages and rural areas. The Plan also needs to identify how to realise the potential and reimagine rural areas and small towns and villages including the identification of sites for regeneration.

The supply and location of jobs and homes must be aligned. This includes providing homes that are affordable and accessible to house the labour force, and the provision of land and premises that meet the needs of current and future businesses, including for smart design and orientation that meet current and future energy efficiency demands. The draft Leitrim County Development Plan should identify a roadmap for this, and zone lands in a range of locations, whilst simultaneously striving to achieve the targets of compact growth.

### **Economic Development**

In relation to addressing the loss of jobs in the County generally between 2011-2016, it is considered that the growth in jobs may be positively assisted post Covid 19 with increasing numbers working from home, opting to work remotely or from local hubs where available. The County Development Plan and LECP should seek to reduce the extent of out commuting (44%) which may also be assisted by current trends towards remote working.

The NWRA believes that strong economic growth, which creates permanent, sustainable jobs, is best achieved by building a competitive and productive economy. The RSES advocates focusing policies on scale, investing in connectivity and in our people whilst aggressively pursuing a low carbon approach to enhance our differentiation. Under this Growth Ambition, the RSES gives recognition to the importance of place-based networks such as the Upper Shannon Erne Future Economy Project. The importance of Research and Innovation and policies which encourage and support the development of local entrepreneurial ecosystems through local clustering and smart specialization are highlighted.

The submission states that the provision and maintenance of economic infrastructure, such as energy, water, and wastewater, are key to delivering compact growth and a connected, vibrant, inclusive, resilient and smart region.

### **National Park / Natural Recreation Area**

The submission references RPO 5.3 to the ambition to consider the zone of North Sligo / North Leitrim (Belbulbin and its hinterland) as a potential National Park / National Recreation area. Collaboration to realising this goal will be crucial, and it would be important that the draft Leitrim County Development Plan reflects this, within the Planning Policy Framework. The creation of such a zone / amenity area should share the ethos of the NWRA that adverse impacts upon local communities, archaeology, built heritage, landscapes and habitats are minimised while at the same time ensuring social and economic benefits accruing to local economies are maximized.



**Heritage**

The ambition for growth needs to be balanced with cognizance of our natural resources, landscape and heritage. The importance of greenways as sustainable and smart transportation links in rural areas achieving such a balance are outlined. In addition, they will further enable the appropriate development of local businesses and start-ups in the vicinity of greenways which is provided for under the RSES Growth Ambition 2 – Natural Region. The SLNCR is referenced as a key route within the region in this regard.

**Rural Development**

In relation to forestry, the submission refers to the establishment of a Regional Fora to set out a framework for sustainable forestry and this should be supported within the plan. The agri-food sector is vital to the region and the stimulation of gastronomy as part of our cultural heritage is something that offers local opportunities and is encouraged.

**Transportation**

The importance of the link between accessibility and mobility having a direct effect on economic competitiveness and the attractiveness of the region for living / visiting is outlined. The provision of prudently managed transport and digital infrastructure is key to delivering on the regional vision. Integrating land use and transport planning is key in this regard along with focusing on the facilitation of the digital economy. The incorporation of Local Transport Plans for key settlements would enable an examination of potential growth from sustainable modes of transport, focusing on modal shift. The priorities for road and rail investment projects are set out in the RSES which includes the provision of the bypassing of Carrick on Shannon. The RSES also recognises the need to upgrade incrementally the N16 which forms part of the Dundalk to Sligo route which will impact on north Leitrim.

**Quality of Life**

The RSES includes '*Quality of Life – Inclusive Region*' as Growth Ambition 4. The region aspires to be one of the '*most liveable places in Europe*' with a commitment to sustainable and inclusive growth. To encourage job creation, the RSES requires a specific focus upon the enablement of access to education, health, employment, recreation and opportunity for all. The co-ordination and delivery of infrastructure, housing and employment land in the right places at the right time is a key outcome, with homes that are affordable.

**Response of the Chief Executive****General**

The contents of the submission from the Regional Assembly have been noted and carefully considered. It is the view of the Chief Executive that the submission again reminds the Planning Authority of our obligations as set out under the Act and the need for the development plan to be consistent with both the NPF and the RSES. It is also considered that some of the points raised in this submission have also been raised in the submission received from the OPR. The Planning Authority were engaged in all stages of the preparation of the RSES and note the high-level summary provided, the guiding principles and the vision which the strategy seeks to realise. It is not considered necessary to comment on the general introduction to the submission but rather to deal with the issues pertinent to the development plan itself.

### **Settlement Strategy**

It is respectfully considered that the issues in relation to the role of Carrick on Shannon in the Settlement Hierarchy and to the sub region generally, the targeting of 30% population growth to the town and the preparation of a joint Local Area Plan for the combined urban centre of Carrick on Shannon / Cortober have already been dealt with in the response to the OPR submission. The Council is committed to ensuring that the balanced growth of Carrick on Shannon is pursued whereby population growth is supported with employment opportunities and increased service provision.

The development plan will take into account the manner in which Covid 19 has enabled people who would have been commuting out of the county to avail of employment in the Economic Strategy pursued through the development plan and also seek to reduce the high levels of out commuting from the county in general. This would have a positive effect on reducing the greenhouse gas emission levels for the county.

As indicated in the response to the submission from the OPR, the Council are committed to the acquisition and servicing of sites in rural settlements (Key Villages, Villages and Graigs). The provision of financial assistance from the Government will be critical in this regard. The Planning Authority is also committed to implementing 20% of all new housing in rural areas on brownfield sites. This has also been addressed in the submission from the OPR. The high level of vacancy in general will only be addressed through the provision of adequate incentives which would provide the catalyst to such owners to undertake upgrades of properties to acceptable standards. The experience to date of the Housing Authority writing to owners of vacant properties in key towns has been frustrating and disappointing with no take up to date by property owners of the existing measures available. No examination of the potential for rural vacant properties has yet been undertaken. It is accepted that the plan needs to identify how to realise the potential and reimagine rural areas and small towns and villages including the identification of sites for regeneration. However, whilst the NPF and RSES both advocate such an approach, neither strategy have presented tangible examples of what these centres could be reimaged as. This is considered a weakness of both. The challenge in Co. Leitrim is more acute than in other counties as the critical mass of communities to sustain services in small towns and villages is simply not present. The solution will require a whole of Government approach rather than depending on a County Development Plan to provide the yet unknown solution to what is a nationwide problem.

### **Economic Development**

The Planning Authority notes the guidance provided by the NWRA in relation to building a competitive and productive economy. The comments are considered generic in nature and applicable to any county within the region. None of the guidance provided in the RSES tailors such guidance to a county level and this is the role of the County Development Plan to identify the specific sectors which are most suitable to different locations.

The Local Authority accepts that the supply and location of jobs and homes must be aligned. The commitment to the growth of Carrick on Shannon has already been mentioned. The role of the Planning Authority will seek to ensure that there is adequate land identified and serviced to provide such homes at a range of locations, that the Housing Strategy is designed on the basis of the most up to date information dealing with Housing Needs Demand Assessment and that the Development Plan Management Standards adhere to the need to provide for smart design and orientation that meet current and future energy efficiency demands. The draft County Development Plan will identify a roadmap for this, and zone lands in a range of locations, whilst simultaneously striving to achieve the targets of compact growth.

The development plan will seek to ensure the provision and maintenance of economic infrastructure, such as energy, water, and wastewater, which are key to delivering compact growth and a connected, vibrant, inclusive, resilient, and smart region.

### **National Park / Natural Recreation Area**

The Council is aware of the ambition to consider the zone of North Sligo / North Leitrim (Belbulbin and its hinterland) as a potential National Park / National Recreation area and this was included in the Strategic Issues Paper. The Planning Authority commits to collaborating to realising this goal and ensure that there will be no adverse impacts, intended or unintended, upon local communities, archaeology, built heritage, landscapes and habitats while at the same time ensuring social and economic benefits accruing to local economies are maximized.

### **Natural Heritage**

The need for growth to be balanced with our natural heritage is accepted and the reference to the greenways in general and to the SLNCR specifically is welcomed. The Local Authority will seek to ensure that these greenways are designed, brought through the necessary planning consent process with a supporting policy framework in place and then constructed. When constructed, the planning policy framework will also seek to capitalise on their potential to act as catalysts for the appropriate development of local businesses and start-ups in the vicinity of greenways.

### **Rural Development**

The view of the Planning Authority to the way the RSES deals with forestry is well documented in previous submissions from this Planning Authority. The Planning Authority is not aware of any progress which has been made on the establishment of a Regional Fora to set out a framework for sustainable forestry although the RSES was only adopted earlier this year. It would be hoped that such a framework for sustainable forestry would be developed to inform this draft development plan although not considered likely to materialize in time. The development plan will ensure that a supportive framework is presented to maximise the potential of the agri-food sector with the success of Drumshanbo in this regard testament to what can be achieved locally.

### **Transportation**

The Strategic Issues Paper acknowledges the inter dependence of accessibility and mobility having a direct effect on economic competitiveness. The development plan will seek to integrate land use and transport planning as practicably as possible whilst focusing on the facilitation and potential of the digital economy. Other than in relation to Carrick on Shannon, the development plan will not seek to prepare Local Transport Plans for other settlements as there is no requirement to do so nor are any other Local Area Plans being prepared. The protection of key transportation corridors once identified, will be provided for as outlined in the response to the submission from the OPR.

### **Quality of Life**

The vision for the new County Development Plan will include reference to quality of life considerations as this Local Authority is convinced that the quality of life on offer in Leitrim cannot be surpassed. The development plan will seek to ensure that adequate lands are zoned and serviced to meet the educational, health, employment and recreational needs of the community. The co-ordination and delivery of infrastructure, housing and employment land in the right places at the right time will be a key outcome. It is not considered that the Local Authority can ensure the delivery of affordable houses other than ensuring that the Housing Strategy deals with this issue in as comprehensive a manner as possible.

Again, this is considered to require a whole of Government approach rather than being a realistic ambition within a County Development Plan.

### Recommendation of the Chief Executive

A series of policies are included in Section 5 which give effect to several suggestions contained in the submission from the Northern and Western Regional Assembly. Where these policies emanate from the RSES, this is clearly stated.

## 4. Submissions

As the submissions from the Office of the Planning Regulator and Northern and Western Regional Assembly have already been addressed separately, this section contains a summary of the remaining 41 no. written submissions and observations received as part of the pre-draft consultation process which are not considered to deal with land use zoning. The section then provides the opinion of the Chief Executive to the issues raised therein followed by the recommendations of the Chief Executive on the policies to be contained in the draft Plan. This accords with the requirements set out under section 11 (4) (b) (iv) of the Planning & Development Act 2000 (as amended). The proposed policies are then outlined in Section 5.

The submissions have been grouped around several themes. Each submission has been allocated a reference number and the points raised are categorised under the relevant headings. The recommendations take cognisance of the fact that there must be consistency with NPF and the RSES, and of the statutory obligations of the Local Authority.

Number	Submission Themes
1.	Vision and Core Strategy
2.	Retail and Town Centre Regeneration and Placemaking
3.	Transport and Movement
4.	Critical Infrastructure
5.	Social Inclusion, Health and Community Facilities
6.	Tourism and Recreational Development
7.	Built and Cultural Heritage
8.	Climate Action and Energy
9.	Biodiversity and Landscape
10.	Water Services and Environment
11.	Rural Development



## 4.1 Vision and Core Strategy

### Submission Reference Numbers:

**01/07; 01/08; 01/12; 01/13; 01/18; 01/19; 01/24; 01/30; 01/36; 01/38 and 01/44**

#### Vision

- The current vision statement needs some revision. The central tenets should be sustainability, wellbeing, living spaces, economy, culture, heritage, pride, and celebration. The objective should seek to develop Leitrim as a sustainable, creative, inclusive and unique place, fostering wellbeing of communities through balanced economic development, creating attractive life places, valuing our unique culture, environment, natural heritage, becoming a green and proud county.
- Request that tourism be referenced within one of the 'key aims' contained within the Core Strategy.
- It is important that every aspect of the plan to achieve the vision have their facts checked.
- Open and transparent consultation and engagement with all parties who may be affected by any development and transparency in how contracts are awarded should be pursued.
- Develop and publish specific measures or performance indicators which establish how progress is quantified and measured.
- An evaluation of the delivery of all key aims should be carried out to highlight and promote areas where progress is being made and should also examine areas where less was achieved and investigate the reasons why. Any barriers to implementation of the key aims should be identified.

### Response of the Chief Executive

The vision of the new County Development Plan will seek to build on the existing vision but adapted to have regard to some of the points raised in the submissions received. The vision must also have regard to changing circumstances which now prevail and to the visions of both the Corporate Plan and the Local Economic and Community Plan (LECP). The vision of the Plan will also have regard to the vision and key principles of the RSES which seeks *'to play a leading role in the transformation of the region into a vibrant, connected, natural, inclusive and smart place to work and live'*.

Presently, the statutory requirements require the preparation of a progress report on the realisation of objectives in a Development Plan 2 years after the plan is made referred to as the mid-term review. There is no requirement to measure the overall success of implementing the Core Strategy or how successful specific policies are. To date most key performance indicators do not measure qualitative issues such as quality of life or sense of place. There is renewed emphasis now being placed on monitoring of progress in achieving the objectives and overall vision of County Development Plans. The OPR is working at present to develop a methodology of measuring success and the Planning Authority is part of a focus group assisting in this process. In addition, measurement of climate change policies will become a more central focus of the next County Development Plan.

The other points raised are noted and will be considered, where relevant, in the preparation of the draft County Development Plan.

### Compact Growth

- Residential development in urban areas should be carried out sequentially where accessible lands including infill and brownfield sites are prioritized over greenfield sites. The development plan should set targets requiring a minimum percentage of new residential and mixed-use development to take place on brownfield/existing sites.
- Larger scale, trip intensive developments should be focused into central locations in urban areas.
- The management of space in town centres should deliver a high level of priority and permeability for walking, cycling and public transport modes to create town centres that are accessible, attractive, vibrant and safe, as places to work, live, shop and engage in community life.
- Support the sustainable development of infill / back land sites that are appropriate in scale and character to that of the historic urban centres, that transitions and accommodates surviving structures and retains the historic streetscape form.
- Ensure strategic housing development supports the vitality and overall character of historic town centres in terms of scale, connection, and mobility strategies.
- Housing development should not be directed at lower tier towns.
- Housing should be developed in or near towns and villages.
- Complete unfinished residential schemes.
- Local Authority social housing should refurbish vacant buildings in town centres rather than constructing new houses.
- To reduce costs and responsibility, the Council should not take developments in charge.
- The plan should acknowledge the fact that Mohill sustains communities not alone around the town / surrounding areas but also the Cloone and Carrigallen areas. It is proposed that ideally Ballinamore-Mohill would be designated jointly as a Tier-2A centre. An explanation is warranted as to why Mohill, south Leitrim's oldest recorded community, is missing from Tier-2A.
- Develop a high-quality housing estate in Manorhamilton.

### Response of the Chief Executive

It is accepted that an efficient use of land is essential for sustainable development. The NPF acknowledges that the physical form of urban development is one of our greatest national development challenges and identifies compact growth as one of the 10 National Strategic Outcomes. This will require delivering a greater proportion of residential development and other development within the existing built-up area of towns and villages and moving away from reliance on greenfield development to meet our future development needs. Creating more compact development has been traditionally more difficult to achieve than a continuous process of pushing development onto greenfield locations due to issues of site assembly.

The Planning Authority accepts several of the points raised which in effect advocate a sequential approach to development building out from a strengthened town and village core. The draft development plan will provide for the growth of towns and villages to a scale appropriate to their role as set out in the Settlement Hierarchy and Core Strategy. The draft plan will be developed in a consistent manner with the NPF and the RSES which provides the population projections / allocations for the plan period. It is also a requirement that the Housing Strategy be based on a Housing Need Demand Assessment (HNDA) which is a robust evidence-based assessment of future housing requirements. This will provide further guidance to the allocation of housing units, types, tenures required to satisfy demand, etc. to different centres based on their positioning in the Settlement Hierarchy. The scale of housing which will be allocated to

centres other than Carrick on Shannon, Manorhamilton and Ballinamore will be modest. In all instances, the Planning Authority will seek to ensure a quality of design and materials befitting the location of the development and at a scale commensurate to the urban centre and the availability of social and physical infrastructure to cater for the needs of the new resident population.

It is a requirement of the RSES that 30% of all new homes will be delivered within the existing built up footprint of settlements. This applies to Carrick on Shannon and suitable sites will also be identified in other towns / villages across the County. The draft development plan will promote the consolidation of settlements and require making better use of underutilised land including infill and brownfield sites. Sites will also be identified that need regeneration / redevelopment and to which the Council intend applying the provisions of the Vacant Site Levy to.

The Local Authority are committed to the completion of unfinished housing estates noting the significant reduction in the number of such developments remaining. The Planning Authority will have regard to the numbers of available substantially completed dwellings in such centres in the compilation of the Housing Strategy. The Local Authority is also committed to continue to progress the taking in charge process of housing developments.

The issue of revisions to the Settlement Hierarchy have already been outlined in the response to the submission from the OPR and no amendment is considered necessary regarding the stated support town role of Mohill. The Planning Authority is committed to quality homes being developed in all urban centres across the County.

### **Rural Housing**

- Rural communities are dying. Acknowledge the need for some rural based dwellings.
- Concern regarding decline of rural towns if focus of development is concentrated in Carrick on Shannon.
- Promote the development of one-off housing on brownfield sites by providing serviced one-off sites with outline planning permission already in place.
- Develop sustainable communities in lower tiers by identifying the key attributes of these places.
- Unsustainable one-off rural housing / ribbon development should not be allowed to continue.
- Encourage sensitive rehabilitation of disused vernacular houses which should be exempt from any restrictive local need requirements.

### **Response of the Chief Executive**

Leitrim County Council recognises the long tradition of people living in rural areas and promotes sustainable rural settlements as a key component of delivering balanced regional development. Facilitating rural housing poses a significant challenge owing to the poor percolation characteristics which are prevalent across most of the county. It is acknowledged that rural areas have experienced low population growth or decline in recent decades and measures to regenerate and sustain rural communities need to be identified and developed. The retention of sustainable rural communities will be a priority of the next County Development Plan. The Council will be proactive in identifying suitable sites in small villages and graigs which can be developed as serviced sites as an alternative to one off housing where the soil characteristics do not permit individual wastewater treatment systems. The

Council will continue to explore innovative ways of ensuring that wastewater from individual dwellings do not present an unacceptable environmental pollution / public health concern.

It is a requirement of the RSES that 20% of all individual dwellings in rural areas consist of brownfield redevelopment and the draft development plan will adhere to this requirement with the qualification already noted in the response to the submission from the OPR.

There is no local need in place in relation to the refurbishment or replacement of an existing dwelling house. The issue of ribbon development is noted and will be addressed in the Development Management guidelines of the new development plan.

### House Type

- A diversity of house type should be provided incorporating the '*Universal Design*' principles.
- Carry out an assessment of housing need and provision and consider all housing options in development (i.e. social housing, sheltered housing, retirement villages, etc.).
- Housing for the elderly should not focus solely on the provision of nursing homes.
- Implement a strategy that facilitates older people to live in well-maintained, affordable, safe, and secure homes, which are suitable for their physical and social needs.
- Focus on meeting the housing and accommodation needs of people with disabilities through a combination of purchased housing, new-build housing, leased housing or rented housing.
- A local re-housing plan should be prepared and jointly coordinated with the HSE, in collaboration with service providers. The plan should be based on best practice seeking to integrate people with disabilities in local communities and should facilitate dispersed housing with personal supports.
- Focus on supporting and sustaining people with disabilities to live in their own homes in the community through the provision of housing grants.
- There are not enough rental properties - Licenses for Air B&B and weekend rents should be investigated.

### Response of the Chief Executive

The draft development plan will seek to ensure that multiple residential schemes contain a mix of house types and sizes for different user needs. However, the role of the market also needs to be acknowledged. The provision of housing, house types, density and development management standards will be addressed in the draft development plan. The requirements of the Housing Needs Demand Assessment which will inform the new Housing Strategy have already been outlined. The preparation of the Housing Strategy also requires consultations with Approved Housing Bodies that operate in Co. Leitrim.

The comments in relation to the needs of the elderly and accommodating persons with disabilities are noted and will be taken into consideration in the preparation of the draft development plan. Suitable policies will be included in both the Housing Strategy and Social Inclusion sections of the new development plan.

At present, there is no urban centre in Co. Leitrim which is designated as a Rent Pressure Zone by the Residential Tenancy Board. As a result, the use of residential properties for 4 bedrooms or less for the purposes of overnight guest accommodation is exempted development which does not require planning

permission. The Planning Authority cannot therefore seek to restrict the number of such properties used for this purpose as there is no legal basis to do so.

### Recommendation of the Chief Executive

The purpose of a Core Strategy is to articulate a medium to longer term quantitatively based strategy for the spatial development of the area. The draft development plan will be consistent with the NPF and RSES for the Northern and Western Regional Assembly area, with Ministerial Guidelines and with Ministerial Policy Directives issued under Section 28 and 29 respectively of the Planning and Development Act 2000, as amended, and any other legislative and policy matters as the Minister may issue. The draft development plan will contain an evidence-based Core Strategy where the amount of housing development to be delivered for the plan period accords with that specified in the RSES, ensuring that development is supported and integrated with a range of facilities in a sustainable manner.

It is recommended that the following policies be included in the draft development plan:

- Implement the Core Strategy consistent with policies at a national and regional level, in particular population targets and distribution.
- Require sustainable compact growth and urban regeneration of towns and villages to ensure that development proceeds sustainably and at an appropriate scale to facilitate population growth in line with the RSES.
- Require 30% of all new homes to be delivered within the existing built up footprint of settlements in accordance with RPO 3.2 of the RSES.
- Require 20% of all individual dwellings in rural areas to comprise brownfield redevelopment in accordance with RPO 3.3 of the RSES.
- Incorporate measures to sustain rural towns and villages in line with RPO 3.4 of the RSES.
- Identify and prioritise a program for the provision of serviced sites within smaller towns and villages in accordance with RPO 3.7 of the RSES.
- Promote densities and high-quality design and layout for new residential developments.
- Strategically prioritise the development of Carrick on Shannon to underpin its role as a designated Key Town and as a driver of economic development in the region.
- Facilitate the expansion of and provision of new mixed-use and employment-generating development within towns and villages at an appropriate size and scale subject to normal planning requirements.
- Formulate a rural housing policy for the open countryside which will seek to balance the need to sustain rural communities with the need to protect Leitrim's natural heritage, environment and landscape qualities.
- Ensure that multiple residential schemes contain a mix of house types to cater for different user needs.
- Ensure new developments incorporate a high level of permeability for walking and cycling.

## 4.2 Retail and Town Centre Regeneration and Placemaking

### Submission Reference Numbers:

**01/04; 01/11; 01/13; 01/14; 01/15; 01/17; 01/18; 01/19; 01/20; 01/24; 01/27; 01/29; 01/30; 01/31; 01/32; 01/35; 01/36; 01/38; 01/44.**

- Consider a ‘*Town Centre First Approach*’ which puts town centres at the heart of decision making to revitalize historic urban centres.
- The development plan must rejuvenate pride of place, encourage unique, place-specific, community organisations to develop a more regional focus.
- Increase the level of housing provision in the main streets of towns and villages.
- Include the protection and nurturing of traditional indigenous and long established “*living over the shop*” businesses.
- Change planning permission policies to encourage people to live over the shops.
- Promote the development of heritage-led regeneration, to plan for the reuse and conservation of built heritage and archaeological sites within the core of urban centres as an integral part of the evolution of the historic place and its significance.
- The vision must be centred on the principles of sustainability and regeneration of people and places.
- Financial incentives are required to encourage people to refurbish buildings and live in their local villages and towns.
- Consider ‘*pop up shops*’ and events to make areas dynamic.
- Consider covered outdoor dining areas, lighting, ambience, street art, music, street trading and open-air cinema.
- Open rear access to existing houses in town centres.
- Ensure the provision of quality, recreational green space in urban environments. Exercise areas, trails and paths need to provide maximum contact with green space. Paths, recreational areas and places to relax and engage with nature should be incorporated to promote use and maintain a feeling of safety. Biodiversity areas can be designed to accommodate playgrounds and other amenity areas.
- Facilitate community gardens/allotments through identifying and releasing suitable publicly owned land.
- Address dilapidation and improve aesthetics - encourage owners to repair, rent or sell buildings if they are vacant for more than 10 years. Provide a painting grant and advise on colours to all buildings in the town centre.
- The public have not been made aware of the number of vacant houses and buildings in the county.
- Address unsightly shop signage that is out of character with the town.
- Advertise and highlight car parking areas. Provide safe parking for campervans to encourage tourists to visit.
- Pedestrianised streets and widening of footpaths- improves air quality, traffic safety and footfall.
- Curtail warehouse development and repurpose existing units.
- Restrict the development of out-of-town retail centres.
- Assist businesses with planning issues, grants, supports and training.
- Give new businesses a waiver from commercial rates.
- Explore job creation.
- Economic growth strategy requires infrastructure, and people with a sense of purpose, identity, belonging to places which promote their unique identity.



- Publish results of attracting inward investment.
- There needs to be a government drive to ensure more medium and smaller enterprises locate in the towns of Co. Leitrim.

### **Specific Objectives relating to individual towns**

#### Carrick on Shannon

- Requests made for a new library, medical and mental health services, hospital and nursing home to be provided for in the town.
- Consider that the Leitrim Design Centre be relocated to the Town Hall on Bridge Street.
- Retain and promote the history of old buildings and encourage stories and walking tours around them.
- Several submissions have been received which specifically object to the demolition of Geraghty's retail unit and family home on Main Street as proposed in a recent Urban Regeneration and Development Fund scheme application. Requests that the development plan expressly prohibits any demolition of Geraghty's and any part of the architectural, historical, and cultural heritage of Main Street.
- Concern regarding businesses moving from Main Street.
- Landscaping - planting of trees on Main Street would greatly enhance the look of the town.
- Incorporation of a central town square with indoor and outdoor spaces in the town.
- Avoid the creation of any vista onto the new Primary Care Centre, the proposed car park on Flynn's Field or any other un-aesthetic object(s) which would severely damage aesthetic, visual and cultural amenity.
- Enhance the look of the back of the buildings on Main Street facing the new Primary Care Centre.
- Public services should be located on the Main Street which are characterised by an excessive amount of retail units with high vacancy rates.

#### Ballinamore

- New footpath required from the former Girls' National school to junction with the Aughnasheelin Road.
- Family resource centre required in the town.
- Install a canopy and crossing ramp at the courthouse.
- Community development officer required for the town.
- Increase in nursing home bed capacity in Ballinamore required.

#### Manorhamilton

- Footpath from Lurganboy to Manorhamilton should be provided.
- Realignment work on the R280 Regional Road from Bundoran-Carrick on Shannon to promote the economic development of Manorhamilton.
- Manorhamilton with its catchment of all North Leitrim and serving parts of west Cavan, north Sligo and south Donegal has the potential to become an employment hub for the region.
- Support indicated for the development of enterprise hubs in the town.
- More industrial and office space required in the town.

### Response of Chief Executive

The Planning Authority recognises the importance of encouraging high quality and well-designed development to support and promote healthy placemaking and quality of life and this will be addressed in the draft development plan. The Council will seek to improve the viability and vibrancy of all urban centres through consolidation, infill, re-use and regeneration, consistent with NPF and RSES policy framework. The Council will support the regeneration and renewal of small towns and villages in rural areas in accordance with RPO 3.4 of the RSES. There are numerous points raised in the submissions received which the Planning Authority fully endorse such as *'Town Centre First Approach'*, the need for new development to respect the character and form of existing historic centres, to increase the number of people residing in town centres, etc. The various submissions received will continue to act as a reference point in the development of the policy framework of the new development plan.

The Council will identify and monitor the scale of housing vacancy within the County and develop an Action Plan to address this issue in accordance with RPO 3.6. Significant work has been done by the Housing Department in identifying the location of such units in the main towns of the county although the response from the owners of such properties has been underwhelming to date. This work will continue. It is considered that the promotion of 'Living over the Shop' requires a more holistic approach than that which can be pursued through the development plan as it requires financial incentives to property owners along with a combined examination through building control certification and fire certification. It is not considered that the issue relates to planning policy per se although the ability to provide private amenity space for residents living over commercial properties would require a solution.

The Retail Chapter in the draft development plan will include objectives to continue to apply for funding as it becomes available to facilitate enhancement, revitalisation, renewal and regeneration of towns and villages under various schemes such as the Urban and Rural Regeneration and Development Funds, Town and Village Scheme, Destination Towns, etc. The draft development plan will strengthen the policy framework on the quality of open spaces, streets and areas enjoyed by the public and support the development and implementation of schemes on a county wide basis. There will be a continued emphasis on the promotion and provision of walking, cycling and social infrastructure throughout the built environment of all towns and villages and policies and objectives in relation to this overarching goal will be intrinsic across many sections and chapters of the draft Plan. The provisions of the Retail Planning Guidelines 2012 will inform the retail & town centre strategy and Carrick on Shannon will be the focus for all types of retail development commensurate with its role as a Key Town. RPO 3.1 of the RSES requires the delivery of compact growth in Carrick on Shannon and developing derelict and underutilised sites, with an initial focus within the town core. Any specific policies or objectives in relation to specific projects in Carrick on Shannon will be contained within the Carrick on Shannon Local Area Plan, the review of which has not yet commenced. All public realm improvement projects carried out by the Council seek to provide improvements in the overall local environment and promote local economic growth and are pursued through Part 8 of the Planning and Development Regulations 2001 (as amended), a process which requires public consultation including invitation to the public and interested bodies to make submissions. Some of the specific projects listed are outside the scope of the Development Plan to deliver and may be more appropriate for the town plans to address such as those under preparation in Mohill and Dromahair as present. A decision will be taken during the preparation of the draft development plan whether to include specific objectives for individual towns noting that no such objectives are contained in the current County Development Plan.

### Recommendation of the Chief Executive

The draft development plan will aim to make Leitrim an attractive rural and urban environment and a better place for people to live, work and visit. Sustainable communities and placemaking, including creating attractive places for people to invest, live, work and visit along with the requirement of high-quality design in all proposals are core themes which will be provided in the draft development plan. The draft development plan will seek to incorporate the following:

- Promote compact growth and adopt measures to encourage the refurbishment of existing buildings and development of brownfield/infill sites, derelict and vacant sites.
- Ensure the provision of high-quality housing and well-designed developments to make places more attractive and contribute to healthy place-making and quality of life, which in turn enhances the public realm.
- Make applications as funding streams become available to facilitate the enhancement, revitalisation, renewal and regeneration of town and village centres.
- Promote high standards for public realm, place making and quality of life considerations for both public and private residential, mixed use and commercial developments.
- Promote Carrick on Shannon as the main retail centre in the County with the provision of retail in other centres commensurate with their roles.
- Support the vitality and viability of existing town and village centres and facilitate a competitive and healthy environment for the retailing sector by ensuring that future growth in retail floorspace responds to the identified retail hierarchy, the sequential approach, and the needs of the projected population of the settlement areas.
- Encourage high quality architectural design in retail development to support the public realm and promote healthy place-making.
- Promote casual trading in the retail centres of towns where it can create an ambiance which can contribute to the vitality and viability of such centres.

### 4.3 Transport and Movement

#### Submission Reference Numbers:

**01/01; 01/05; 01/07; 01/13; 01/16; 01/24; 01/27; 01/43; 01/44.**

#### Sustainable Transportation

##### Minimise Demand – Integration of Land Use and Transportation Considerations

- Promote, encourage, and facilitate the use of sustainable modes and patterns of transport – a shift away from the private car to greater use of active travel and public transport is required.
- Promote walking, cycling and public transport by maximising the number of people living within walking and cycling distance of their neighbourhood or district centres, public transport services and other services at the local level such as schools. It is recommended that the Council identify small scale projects that can achieve significant gains i.e. segregated pedestrian & cycle paths to connect industrial estates / workplaces to towns and residential areas to schools, local neighbourhood centres and public transport stops.

- The density and location of employment development should maximize the potential for the use of walking, cycling and public transport.
- Trip destinations (employment sites, schools, retail, etc.) should be developed at locations that can maximize the potential to access such developments by walking, cycling or on public transport.
- A framework for workplace health and wellbeing, including physical activity should be developed.
- The smarter travel workplaces initiative should be promoted. Sustainable or active modes of travel should be facilitated.
- Co-ordinate significant infrastructural projects such as public realm works, flood relief works or new transport routes and alternative modes of transport to the benefit of surviving historic sites to improve their enjoyment, presentation and enhanced accessibility.

### Walking and Cycling

- New development areas should be fully permeable for walking and cycling with specific policies on cycle parking in the urban realm and in private developments.
- A portion of the Councils transport budget should be allocated to providing a comprehensive network of safe, well-lit footpaths and cycle lanes.
- Develop safe walking and cycling routes to and from schools and other educational institutions as well as providing disability access.
- All development should be required to show a route map showing safe cycling and walking routes to schools, shops and public transport.
- A *'quality audit'* of pedestrian routes in towns and villages in the county is required to ensure they are safe, well-lit and enticing for users. It is essential that landscaped, safe and secure pedestrian walkways/cycleways are provided in order.
- Widen footpaths where there are high pedestrian flows, particularly close to public transport nodes. Improve the surface quality of footpaths Provide appropriately designed safe, well-lit, direct, continuous facilities for pedestrians.
- Ensure State-owned lands such as canal towpaths, former rail lines, Coillte estates, etc. are made available for the development of walking and cycling trails
- Support the provision of dedicated signed rural cycling networks building on Fáilte Ireland's Strategy to Develop Irish Cycling Tourism.
- Segregate cycle paths if possible. Ensure that all surfaces used by cyclists are maintained to a high standard and are well lit and signposted.
- Provide secure cycling parking at all destinations of importance to the cyclist and aim to integrate cycling and public transport and the provision of cycling parking at all appropriate public transport interchanges.
- Ensure that the urban road infrastructure (except for motorways) is designed / retrofitted to be cyclist friendly. Link up all existing cycle lanes.
- Provide facilities such as secure bike parking and changing/showering facilities at places of employment in public authorities to encourage staff to cycle.

### Modal Share

- Include sustainable transport indicators, including modal share, for the purpose of monitoring the efficacy of policies and development objectives against a range of sustainable development indicators.
- An audit should be carried out of existing pedestrian and cycle infrastructure.
- Set a target that every school in Leitrim has a school travel plan to encourage students to take alternatives to the car.

### Traffic Management

- Reprioritize traffic signals to favour pedestrians instead of vehicles, reducing waiting times and crossing distances at junctions.
- Create level grade crossings for pedestrians across junctions.
- Create larger traffic-free areas in urban centre.
- Ensure that 30 km/h zones are designated in central urban areas which accommodate motorized traffic.
- Support private and public sector initiatives to establish car club schemes. Provide on-road parking spaces to be designated for car clubs through appropriate signage.
- Implement measures to reduce the volumes of through-traffic, especially HGVs, in town centres and especially in the vicinity of schools and colleges.
- Introduce traffic calming measures / enforce low traffic speeds in urban areas, make junctions safe for cyclists.

### Electric Vehicle Charging Points

- Expand public and domestic Electric Vehicle charging points infrastructure by implementing minimum levels of parking provision for Electric Vehicles.

### Guidance

- Ensure the development plan is guided by the following NTA Guidance, The National Cycle Manual; Permeability Best Practice Guide; Achieving Effective Workplace Travel Plans: Guidance for Local Authorities; Workplace Travel Plans: A Guide for Implementers; Toolkit for School Travel; and Guidance Note on Area Based Transport Assessment (NTA and TII).

## **Response of Chief Executive**

The Planning Authority generally accept the merits of most points raised in this regard. It is considered that some of the points raised in submissions received from statutory bodies are somewhat generic in nature rather than having been formulated specifically with a rural county such as Co. Leitrim in mind.

Compact urban development with associated pedestrian and cycle infrastructure will be encouraged as it facilitates sustainable transport choices. The importance of quality pedestrian / cyclist linkages and permeability of towns and villages will be encouraged to create accessible, attractive, vibrant and safe places. The draft plan should continue to promote walking and cycling through the provision, upgrading and maintenance of cycleways and footpaths as resources allow; and ensure that connectivity is provided in new developments with the provision of good pedestrian and cycle network facilities. Trip intensive developments will be encouraged into central urban locations. Sustainable mobility and accessibility will be promoted in the development plan in the interests of reducing the carbon footprint associated with transport. As required under the policy framework of the RSES, a Local Transport Plan will be prepared for Carrick on Shannon / Cortober which shall inform the policies and objectives in the draft Local Area Plan (RPO 6.28). However, Leitrim County Council have not the financial nor human resources required to deliver on the extent of measures outlined in the various submissions received however desirable.

Improvements to the roads across the County in terms of upgrades, realignments, repairs, traffic management measures and traffic calming should be assessed and implemented as deemed necessary and as resources allow.

Further, as required pursuant to RPO 6.34, the draft development plan will include policies which promote the deployment of targeted, convenient and safe electric charging infrastructure across the county with particular emphasis in public parking areas and employment locations.

It is not considered that local traffic management measures are a matter for a development plan.

#### **Carrick on Shannon bypass**

- Need transport solution for Carrick on Shannon that encourages people to visit rather than bypass the town.
- A bypass will improve environmental quality and make the town more pedestrian friendly.
- Transport Infrastructure Ireland (TII) welcome consultation on the preparation of the Local Transport Plan and Joint Local Area Plan required by the NWRA RSES objectives and is available for consultation in relation to any local land use and/or transport plan with implications for the strategic national road network in the County.
- It is recommended that Leitrim County Council investigate how much of the traffic issues in Carrick on Shannon is due to local traffic undertaking journeys of under 2km. Pedestrian and cycle facilities should be provided that would encourage a model shift away from the car to walking or cycling.

#### **Response of Chief Executive**

The comments of the TII are welcomed in relation to their involvement in the preparation of a Local Transport Plan to inform the joint Carrick on Shannon – Cortober joint LAP. The N4 Carrick on Shannon to Dromod route is included as a Scheme in Pre-Appraisal/Early Planning in the National Development Plan. As outlined in the Strategic Issues Paper, the development of a transportation solution to the existing congestion on the national and regional road network is a critical element in the transportation strategy for Carrick on Shannon. A solution is needed to address transportation issues which include congestion on the main routes approaching the town and in the town itself, unreliable journey times owing to delays and conflict between through and local traffic. In turn these are having an impact on the wider economic and social life of the town, county and region. The quality of life for those living and working in Carrick on Shannon is negatively impacted and accessibility to the town is compromised. The development of a transportation solution in conjunction with the TII that will address these issues is therefore a Corporate priority for Leitrim County Council. This solution will also include consideration of opportunities to improve public transportation options and facilities for cyclists and pedestrians. In addition, the Council will work in conjunction with the TII, the NTA and Roscommon County Council in preparation of a Local Transport Plan for Carrick on Shannon / Cortober in accordance with RPO 6.28.

#### **Public transport**

- Request for enhanced bus lane provision, the provision of more park and ride facilities and infrastructure improvements to provide shelter and real time travel information at all bus stops.
- An audit of bus infrastructure should be carried out.
- To influence behavioural change in the population and promote greater take up of active travel.



- Establish park and ride facilities along major public transport nodes, at the periphery of major urban areas and at key public transport locations and nodes.
- Create physical bus-stops, the provision of park and ride car parks and the provision of commuter train services to facilitate public transport uptake.
- Expand the Local Link bus service.
- Investigate local carpooling schemes.
- Make public transport fully accessible to the elderly and people with disabilities.
- Acknowledge the role rural transport services can perform in providing for social and economic connectivity between small villages/rural areas and larger towns.
- Promotion of the integration of the Rural Transport Programme with other local transport services.
- Provision of public transport linkages to major health facilities and personal social services.

### Response of the Chief Executive

The Council recognises the importance of a well-functioning, high quality public transport system in terms of sustainability, in addressing rural isolation and in the achievement of climate action goals. A policy will be included in the draft development plan to support and expand public transport services including the Local Link Rural Transport Programme and any subsequent programmes. It is considered important that the policies contained in the draft County Development Plan are realistic, reflective of the dispersed rural nature of population in our county and do not seek to over stretch on what is deliverable in this regard. The provision of an effective and efficient public transport (bus-based system) requires a critical mass which is not present in Leitrim. There is a good train service serving south Leitrim along the Sligo – Dublin rail line although the decision to introduce paid parking at Dromod train station by Iarnród Éireann / Irish Rail is seen by some as a deterrent to use the train. It was introduced to ensure a greater turnover of spaces whereby customers were leaving their cars parked at the station during the week / overnight. Iarnród Éireann / Irish Rail have greatly increased the extent of car parking at this station whilst there remains an under supply in the provision of car parking to serve the Carrick on Shannon station in Cortober.

### Road Network

- Maintain the strategic function, capacity and safety of the national roads network.
- Consider the implication of land use policies on the strategic national road network.
- Protect undeveloped lands adjoining national roads and junctions from development to cater for potential capacity enhancements.
- Ensure that capacity enhancements and or traffic management measures will be put in place to facilitate new development.
- Improve operational efficiency of the regional and local road and transportation infrastructure.
- Avoid the creation of additional access points from new development or the generation of increased traffic from existing accesses to national roads to which speed limits greater than 50kph apply.
- Protect national road schemes from adverse development that may compromise the development of route options or the construction of preferred routes or add to the overall costs associated with proposed schemes.
- Local traffic generated by development should be catered for primarily within the local road network.
- The Council are requested to reference RSA and RSIA requirements, S.I. No. 140 of 2006 Environmental Noise Regulations, TII Service Area Policy (2014), the Policy on the Provision of

Tourist & Leisure Signage on National Roads (March 2011) and the DoECLG Guidelines TII Traffic & Transport Assessment Guidelines (2014) in the Draft Development Plan relating to development proposals with implications for the national road network.

- TII welcome consideration being given to including a new objective associated with safeguarding investment in the national road network relating to protection of national road drainage regimes including the following objective that *'The capacity and efficiency of the national road network drainage regimes in County Leitrim will be safeguarded for national road drainage purposes'*.
- Require the submission of Glint and Glare Assessments with relevant applications where there may be implications for the safety and efficiency of the strategic national road network.
- TII welcome consideration being given to including an objective in the development plan, in relation to renewable energy and in relation to safeguarding the national road network, indicating that it should be demonstrated that an assessment of all alternative grid connection route options has been undertaken prior to any proposals being brought forward for grid connection routing utilizing the national road network.
- Any costs such as land acquisition, additional road infrastructure and environmental mitigation measures arising to the national roads network to accommodate local development proposals will be borne by the Local Authority and will not be funded by TII and thus should be integrated into future local development contributions schemes.

### Response of Chief Executive

The Planning Authority generally accept the merits of all points raised in this regard. The submissions from several statutory bodies such as the TII, Department of Transport, Tourism & Sport and NTA will be used as reference during the preparation of the draft development plan.

In terms of impact on the road network, the draft development plan will include land use policies which support the consolidation of urban generated development within existing urban areas, and which aim to integrate considerations of land use and transport planning. The Planning Authority will continue to restrict new accesses onto national roads and protect the safety, strategic transport function, capacity and efficiency of national roads across this county. The Planning Authority will consider the inclusion of access points to existing developments which are onto national primary roads or any proposed strategic developments which would be located outside of the restricted speed limits as exceptional circumstances as provided for under section 2.6 of the Spatial Planning and National Road Guidelines. The existing Elastometall facility on the N16 outside Manorhamilton would be one such example. The Guidelines allow for the application of 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. Such locations must be agreed with the TII during the preparation of the draft Development Plan. The concerns raised by the TII in relation to grid connections only using the national road network as a last resort are noted although the Planning Authority considers this to be a generic response rather than specific to Leitrim having regard to the siting / location of sub stations. The requirement for glint and glare assessments are also noted but the previous point is equally relevant as the siting of such solar farm developments is restricted to locations proximate to existing sub stations which have capacity (Mohill and Carrigallen) which are not committed to wind energy.

**Car Parking**

- All non-residential development proposals should be subject to maximum parking standards.
- In locations where the highest intensity of development occurs, an approach that caps car parking on an area-wide basis should be applied.
- Specify a maximum permitted level of car parking for commercial sites, which have suitable public transport facilities and are within walking/cycling distance to amenities.

**Response of Chief Executive**

Car parking standards will be reviewed during the draft development plan process. Car parking standards will be reviewed in appropriate town centre in the draft development plan to reflect the proposed modal shift away from the private car to more sustainable forms of transport, such as cycling and walking.

Again, similar to the response in relation to public transport, the appropriate car parking standards must take account of the dispersed nature of our resident population and the dependence on the private car as the dominant source of personal transport. It is considered that submissions from bodies such as NTA tend to include the requirement for maximum car parking standards without necessarily considering the local circumstances and limited range of alternatives to the private car for transport.

**Recommendation of the Chief Executive**

The draft development plan will incorporate the following measures:

- Ensure that Electric Vehicle charging infrastructure and secure cycle parking facilities are provided in all developments, where practicable.
- Support sustainable and compact forms of development and strictly control development, outside of identified settlements, to safeguard and have minimal impact on the carrying capacity, efficiency and safety of the national road network.
- Seek to agree a limited number of any existing and proposed access points on National Primary Roads outside of restricted speed limit areas as exceptional circumstances with the TII in accordance with the Spatial Planning & National Roads Guidelines for Planning Authorities (2012).
- Adopt land use patterns that safeguard the road network and provide for sustainable mobility.
- Incorporate design solutions for greater pedestrian and cycle movements and to facilitate the use of sustainable modes of transport thereby reducing carbon emissions but also providing a healthier and greener environment for residents and visitors.
- Facilitate development of the road network in accordance with the National Development Plan and with Government policy and have regard to the Spatial Planning & National Roads Guidelines for Planning Authorities 2012, ensuring that the safety, strategic transport function and efficiency of national roads and associated junctions will be maintained.
- In accordance with the RSES, to prepare a Local Transport Plan for Carrick on Shannon / Cortober which shall inform the policies and objectives in the draft Local Area Plan for Carrick on Shannon / Cortober (RPO 6.28 refers).

- Acknowledge the important role rural transport services perform in providing for social inclusion and economic connectivity by seeking to expand the service which is currently provided.

#### 4.4 Critical Infrastructure

##### Submission Reference Numbers:

**01/13; 01/25; 01/27; 01/38; 01/40; 01/44.**

##### Schools

- Include policy objectives on both the provision of new schools and the protection of existing schools and the development of wider infrastructure and amenity objectives within the development plan.
- Continue the Social and Community land use zoning objective which makes provision for schools.
- The inclusion of buffer zones and land use designations that support education development adjacent to existing and established schools.
- The proposed development of sites which have already been or may be identified for school provision to meet immediate school place requirements should be explicitly supported by means of an appropriate zoning and/or by a specific local objective on the subject sites in the relevant statutory land use plan.
- Facilitate the principle of permitting schools, both permanent and temporary, in as many land use zoning categories as possible.
- Consider potential synergies with adjacent public (and commercial) facilities in the proposed siting of schools or vice versa, particularly opportunities to locate schools adjacent to open space or recreation amenities, childcare provision and/or other community facilities.
- That the capacity of existing schools and any planned schools, as published by the Department of Education and Skills, be considered as “*supporting infrastructure and facilities*” in the assessment of the suitability of specific lands for residential development.
- Where a designated school site forms part of a wider development area or plan that is being implemented incrementally, or divided into phases by the developer(s), then the Department requests that the granting of permission for any part or phase of that wider development be contingent upon the full consideration and provision of infrastructure and services to the school site as part of that development and such infrastructure and services must be specified to the standards and capacity required for the future school provision at that location.
- A new National School and sports arena is required for Carrick on Shannon.

##### Response of the Chief Executive

The Department of Education and Skills is responsible for the delivery of educational facilities and services. The Planning Authority’s role in education provision is to ensure that adequate serviced land is available at appropriate locations to meet current and future educational requirements. The Planning Authority will continue to liaise with the Department of Education and Skills during the plan making process to ensure that adequate education facilities are delivered / locations safeguarded commensurate with the projected population growth contained in the Core Strategy. This will include the reservation of sufficient zoned land for expansion of existing schools and/or provision of new schools, where considered necessary. The draft development plan will have regard to the Section 28

Ministerial Guidelines entitled ‘The Provision of Schools and the Planning System, A Code of Practice for Planning Authorities’ (Department of Education & Science and DEHLG, 2008).

### Postal Services

- Regard for operational requirements of the postal services such as the maintenance of vehicular access issues in the design and construction of all public realm schemes.
- Support An Post in the provision of postal infrastructure, new postal facilities and the enhancement of existing facilities including operational requirements.
- Promote the integration of appropriate Post Office facilities within new and existing communities that are appropriate to the size and scale of each settlement.
- Provide flexibility with car parking standards for postal facilities.
- Adopt flexible land use zonings that accommodate postal infrastructure and services at suitable locations throughout the county.

### Response of Chief Executive

The submission received seeking support for the expansion and enhancement of postal infrastructure throughout the county is welcomed. There is consultation with the public and all affected parties for any proposed public realm project to ensure that concerns, where feasible, are satisfactorily addressed and the continuation of existing uses and services are not affected. It is noted that no submission was received from An Post at the time of the preparation of the Part 8 Public Realm Improvement Scheme in Carrick on Shannon. It is considered that most of the issues raised in their submission relate indirectly to that scheme. The retention of the access to the existing An Post and Eir depots is provided for in the Public Realm Improvement Scheme.

### Telecommunications

- High speed broadband has been identified as a service shortfall – broadband infrastructure must be the central and core economic policy aim for the county.
- Facilitate the expansion and improvement of telecommunications infrastructure to help position the county to attract intellectual & physical capital and to act as a mechanism to improve virtual connectivity.
- Establish e-working centres to provide opportunities for people in rural areas and satellite towns to work from a location closer to home and reduce the need for commuting.
- All new developments should have open access fibre connections.
- Update current policies and guidance to reflect the Department Circular PL 07/12 – *Telecommunications Antennae & Support Structure Guidelines*.
- Develop Manorhamilton as a SMART town.

### Response of the Chief Executive

As outlined in the Strategic Issues Paper, the Council is fully supportive of the rollout of the National Broadband Plan. The Council will facilitate service providers in the development of key telecommunications infrastructure and assist in the roll out of the National Broadband Plan.

With regard to telecommunications and the co-locating of necessary infrastructure, the development management standards contained in the draft development plan will require any planning application providing justification for any proposed new structure including written evidence of site-specific consultations with other operators seeking to share existing sites and support structures. In situations where it not possible to share a support structure, the applicants will be encouraged to share an existing site, replace or modify an existing structure to enable extra height or bulk, or to locate adjacently so that masts and antennae may be clustered.

It is noted that Manorhamilton is already connected to the Metropolitan Area Network (MAN) operated by E-Net. The MANs operate on an open-access basis meaning that all licensed carriers can have access. This model is contrary to traditional operators' exclusivity of network and allows for competition in a way that has not previously happened. The MANs underpin a policy of balanced regional development by removing a barrier to Foreign Direct Investment (FDI) and there is demonstrable evidence to highlight that MAN towns now secure the vast majority of FDI jobs. The exploitation of this infrastructure to the maximum benefit will be pursued in the draft development plan.

#### **Recommendation of the Chief Executive**

Appropriate policy shall be included in the draft development plan to ensure that adequate and appropriate critical service infrastructure should be in place, or required to be put in place, to service any development proposed and authorised during the lifetime of the plan.

The draft development plan will include policies to liaise with the Department of Education and Skills in order to facilitate the provision of education facilities in accordance with 'The Provision of Schools and the Planning System, A Code of Practice for Planning Authorities', (Department of Education & Science and DEHLG, 2008).

The Council will facilitate service providers in the development of key telecommunications infrastructure and assist in the roll out of the National Broadband Plan.

## **4.5 Social Inclusion**

#### **Submission Reference Numbers:**

**01/13; 01/28; 01/44.**

#### **Social Inclusion**

- Provide opportunities for other nationalities resident in Co. Leitrim to display their own heritage, music and skills.
- Improve community inclusion and connectivity of people with disabilities in their local community and community-based services.
- Support people with disabilities to access employment and education opportunities.
- Support people with disabilities to access mainstream community services.
- Promote access (in terms of affordability, transport availability, accessibility of venue) to a wide range of opportunities for continued learning and education for older people.



- Promote the concept of active citizenship and the value of volunteering and encourage people of all ages to become more involved in and to contribute to their own communities.
- Promote the development of opportunities for engagement and participation of people of all ages in a range of arts, cultural, spiritual, leisure, learning and physical activities in their local communities.
- Develop the provision of alcohol-free venues for young people with young people being centrally involved in the development and management of the programmes and venues; late night and weekend opening; and increased access to school facilities in out of- school hours.
- All community facilities provided should have shared services making them more sustainable.
- Development of a Family Resource Centre in Ballinamore.

### Response of the Chief Executive

The Council is committed to developing a more socially inclusive society and promoting participation and access for all. The preparation of the draft development plan must also be cognisant of the range of services for which the Local Authority is responsible for. In this regard, a development plan cannot seek to include policies the implementation of which depends on other agencies / stakeholders. As a result, the wording of such policies seeks to use words such as *'support'* and *'promote'* rather than including specific objectives which are measurable and time bound. It is also considered that the review of the Local Economic and Community Plan will have a greater degree of responsibility on certain issues raised than in a statutory County Development Plan.

### Community Health

- Support community-based initiatives that develop programmes that encourage healthy lifestyles and prevention of obesity in children and adults.
- Promote, through planning and the built environment, the benefits of healthy eating, physical activity and non-sedentary behaviour.
- Carry out an assessment of food outlets to ensure that choices of healthy food options are equally available and to prevent a proliferation of fast-food outlets.
- Improve availability of and access to healthier food choices.
- Support developments that aim to improve the overall health of the population.
- Support opportunities for increasing physical activity levels generally / in the community through Local Sports Partnerships and supporting initiatives.
- Facilitate the production of more locally produced healthy, high quality food.
- Implement the tobacco free playgrounds initiative.
- Promote tobacco free environments.
- All development should promote cycling and walking.
- A network of cycle routes and footpaths should be planned and developed which aim to promote connectivity of housing/employment to town centres, park and recreational amenities.
- Develop local and regional parks and recreational spaces that encourage physical activity.
- Explore opportunities to maximize physical activity and recreation amenities in the natural and built environment.
- Support and develop 20 new walking groups in the County through funding of signage, upgrade of paths and lighting and resolving safety issues.
- Developing a standardized framework for publicly funded programmes designed to increase physical activity levels.

- Increase the active school flag programme to at least another 20 schools in the county.
- Nursing Homes or Residential Care Facilities should include proposals for gardens and recreational activities. Physical activity should be integrated into long term care planning and practice.

### Response of the Chief Executive

Quality of life factors and ‘*placemaking*’ are increasingly recognised as key to developing attractive places in which to invest, live, visit and work including access to amenities, facilities, arts, culture and heritage. The importance of community facilities in the county is recognised and it will be essential to protect and expand such facilities through appropriate policies and objectives. The point raised in the preceding section is again relevant in terms of the range of policies which are relevant to a County Development Plan. It is not considered the remit of a Development Plan to seek to prevent of obesity in children and adults or to promote healthier foods. Development Plans have sought to reduce a proliferation of fast foods / take-aways but not necessarily for these reasons. It is the role of the development plan to have the necessary physical infrastructure in place to allow people to exercise and opt for the non-motorized option of transport to the maximum extent possible. The extensive submission received from the HSE will continue to be used as reference point in the preparation of the draft development plan.

### Recommendation of the Chief Executive

The draft development plan will seek to support and facilitate the development and expansion of community infrastructure, facilities and services by working with the relevant agencies as appropriate to ensure the timely provision of community services required for the creation of sustainable and social inclusive communities. The draft development plan will support the key priorities of the Healthy Ireland Plan to promote health and well-being to the extent considered relevant for such a strategy.

## 4.6 Tourism and Recreational Development

### Submission Reference Numbers:

**01/10; 01/13; 01/16; 01/22; 01/23; 01/24; 01/26; 01/30; 01/36; 01/38; 01/39; 01/45.**

#### General

- Tourism facilities should be promoted and safeguarded.
- Fáilte Ireland recommend that support for the internationally recognised VICE model should be identified in the Plan. This model identifies sustainable tourism as the interaction between Visitors, the Industry that provides services to them, the Community and culture that hosts them and their collective impact on and response to the Environment where it all takes place.
- Include a dedicated tourism chapter including maps within the development plan. This should build on the actions and objectives set out in the Leitrim Tourism Strategy 2015-2021 and recognize the role that tourism plays in the overall operation and development of the county.
- The following tourism assets could also be added to this list in the development plan:
  - Manorhamilton Castle
  - Parke’s Castle

- Eagles Rock
- Creevelea Friary
- Glenfarne Forest
- Lough Allen
- Beara Breifne Way
- Ball Room of Romance
- Acres Lough
- Fáilte Ireland request that the ‘Ireland’s Hidden Heartlands’ identification and branding is fully integrated into the development plan and that an objective aligning with, supporting and promoting this initiative is also included.
- Fáilte Ireland request the following 5 key principles for sustainable tourism development should be set out as the introduction to the tourism policy statements in the Plan:
  - *Principle 1: Tourism, when it is well managed and properly located, should be recognized as a positive activity which has potential to benefit the host community, the place itself and the visitor alike. Sustainable tourism planning requires a balance to be struck between the needs of the visitor, the place and the host community.*
  - *Principle 2: Our landscapes, our cultural heritage, our environment and our linguistic heritage all have an intrinsic value which outweighs their value simply as a tourism asset. However, sustainable tourism planning makes sure that they can continue to be enjoyed and cherished by future generations and not prejudiced simply by short term considerations.*
  - *Principle 3: Built development and other activities associated with tourism should in all respects be appropriate to the character of the place in which they are situated. This applies to the scale, design and nature of the place as well as to the particular land use, economic and social requirements of the place and its surroundings.*
  - *Principle 4: Strategic tourism assets – including special landscapes, important views, the setting of historic buildings and monuments, areas of cultural significance and access points to the open countryside, should be safeguarded from encroachment by inappropriate development.*
  - *Principle 5: Visitor accommodation, interpretation centres, and commercial / retail facilities serving the tourism sector should generally be located within established settlements thereby fostering strong links to a whole range of other economic and commercial sectors and sustaining the host communities. Sustainable tourism facilities, when properly located and managed can, especially if accessible by a range of transport modes, encourage longer visitor stays, help to extend the tourism season, and add to the vitality of settlements throughout the year.*
- Promote North Leitrim as a national park or a national eco heritage park based on the greenway and the Glens with focus on recreational activities, the arts, eco-tourism, educational visits, high nature value farming, ensuring nature enhancement and protection.
- A priority should be to provide a wider range of targeted public transport options for visitors who wish to travel from urban areas to rural based visitor attractions and amenities. Possible delivery mechanisms to be explored would include the extension of the Rural Transport Network (Local Link) to include tourism objectives and key tourism sites.
- Policies relating to accommodation, multi-partner approaches, the establishment of navigation and signage strategies, provision of facilities for walkers, cyclists, water based tourists are all encouraged to deliver on the potential of Ireland’s Hidden Heartlands and should be fully enshrined in the development plan.
- Develop Historical Trails across the region.
- Increase the number of greenways, cycling routes and development on the waterways/ blueways.

- Include an objective recognising and supporting the forthcoming Shannon Masterplan and improving access and visibility.
- Compile a directory of publicly accessible sports/recreational and amenity facilities. All new facilities should be added to this directory and an audit carried out to ensure that all existing sites/facilities are entered.
- Establish processes that enable consultation with children and young people in the development and implementation of programmes in which they are involved.
- Additional fishing stands and access to lakes should be provided.
- Promote and develop water sports.
- Develop a writers/arts festival.
- The branding of the Wild Atlantic Way has had an adverse impact on business.
- Greenways and other associated linear trails should be designed to consider and avoid where necessary, the sensitivities of natural heritage.

### Location Specific Projects

- Develop a range of new festivals in Ballinamore.
- Construct a walking trail '*The Loop*', an off-road walkway adjoining the Shannon/Erne waterway from Aughoo Bridge, into Ballinamore and link back to Lock 5 via the current walkway at Kiltymooden.
- Protect St Felim's playing pitch in Ballinamore for active recreational use and develop a running track around its perimeter.
- Develop an all-weather pitch and tennis court close to Ballinamore sports hall.
- Street landscaping, lighting and tourism information points to be enhanced / provided in Ballinamore.
- Promotion and development of Poll an Easa Waterfall, Corramartin, Aughnasheelin.
- Continue to support the Castle project as a tourism hub for Manorhamilton and surrounding Villages.
- Manor Sports Hub to be continued as a hub to support the sporting organisations to thrive and grow.
- The old hospital building in Mohill could be converted into a local history museum.
- Re-open the old railway line between Dromod and Mohill.
- Develop a museum in Carrick on Shannon and Manorhamilton.
- Include an objective to support future tourism initiatives in Carrick-on-Shannon in order to capitalise on the potential benefit of the funding for the town of Carrick-on-Shannon.
- Development of Sliabh an Iarainn Mountain bike trail and walk.
- Develop a boardwalk at Glencar Lake for swimming and kayaking.
- Develop a *Slí Conmaicne* brand networking the heritage of south Leitrim tribes.
- Develop a *Slí West Breifne* brand networking the heritage of north Leitrim tribes.
- Include a policy/objective to support the delivery of the Sligo Leitrim Northern Counties Railway (SLNCR) Greenway project.
- Develop walking and cycling trails by utilising De Cuellar trail and Kingfisher trails.
- Request an objective be included in the Plan, to safeguard the future success of '*The Beara Breifne Way*'. This should relate to key issues such as promoting key facilities and services for visitors such as accommodation, signage, parking, and sustainable transport.

### Response of the Chief Executive

The Council recognises the economic benefits that tourism brings to an area and the potential which remains to be developed to the north of the county in terms of SLOW adventure tourism. The draft development plan will include a Tourism & Recreational Development section which will include policies and objectives to develop tourism infrastructure at appropriate locations around the county. A policy will be included in the draft development plan to investigate the potential of and opportunities for the development of existing and new cycle and walking trails in the county. It is important that the development plan does not seek to replicate the provision of a Tourism Strategy which already exists but to identify the elements of the Tourism Strategy which are of relevance to the development plan and ensure that the required policy framework to assist in the provision of specific and dedicated tourist facilities are included.

The Council recognises that Leitrim has a rich natural, built and cultural heritage which plays an important role in tourism development in the county. Policies and objectives will be included to support enhanced access to waterways, monuments and historic properties and to support the extension of greenways, blueways and trails within the county and the integration and linkage of them with other existing and proposed greenways, blueways, and trails both within and outside the county.

A decision will be taken during the preparation of the draft development plan whether to include specific objectives for individual towns noting that no such objectives are contained in the current County Development Plan.

### Recommendation of the Chief Executive

The draft development plan will acknowledge the value of tourism to the economy and will aim to promote and facilitate the development of tourism in the county. The plan shall incorporate the following:

- Incorporate measures for additional walkways/cycleways to be provided subject to prioritisation and satisfactory liaison with relevant outside bodies, landowner agreement and funding provisions.
- Set out how tourism development will be accommodated whilst protecting biodiversity and the natural landscape.
- Include policy as appropriate and support the promotion of Ireland's Hidden Heartlands and the Wild Atlantic Way, in addition to co-ordinating and liaising with relevant bodies.

## 4.7 Built and Cultural Heritage

### Submission Reference Numbers:

01/16, 01/27, 01/30, 01/36, 01/38, 01/39 & 01/44.

### Designed Landscapes

- Identify significant historic designed landscapes, demesnes, and gardens for protection under the development plan.
- Designate Architectural Conservation Areas to preserve the character of historic designed landscapes, demesnes and gardens and identify and protect significant views to or from such places.
- Encourage the compilation of conservation plans for the long-term conservation and management of cultural landscapes and their components in the ownership of the Local Authority / State and encourage the cataloguing of flora and fauna within these places.
- Protect and promote heritage and traditional varieties of plants and trees within our historic designed landscapes, demesnes and gardens. Preserve and protect the biodiversity of these places and, where appropriate, encourage the enhancement of the range of plant and animal species, to add to local, regional and national biodiversity.

### Response of the Chief Executive

The draft development plan will be informed by a review of the Landscape Character Assessment last undertaken in 2002 which has been recently completed. The National Inventory of Architectural Heritage has compiled an assessment of designed landscapes / gardens which will be considered in the preparation of the draft development plan. It is not planned to extend the number of existing Architectural Conservation Areas across the county. However, it is proposed to include an objective to carry out an appraisal of existing Architectural Conservation Areas during the lifetime of the next Development Plan. These appraisals would describe the special character of each ACA and will be a useful guide for the public and Local Authority regarding the appropriateness of works contained therein.

A strategy for green infrastructure will be investigated as part of the draft Plan to raise awareness of the importance of environmentally designated sites, water corridors, and green spaces to enhance opportunities for recreation and tourism and in adapting to climate change.

### Built Heritage

- Incorporate the policies and objectives from Heritage Ireland 2030, the Climate Change Sectoral Adaptation Plan for the Built and Archaeological Heritage and the National Policy on Architecture into the draft development plan.
- Ensure that measures to upgrade the energy efficiency of vernacular buildings acknowledge their inherent vernacular characteristics, techniques and materials and do not have a detrimental physical or visual impact.
- Implement policy, raise awareness and provide guidance to owners of historic buildings on issues such as thermal upgrading and building repair requiring the Council to employ a Conservation Architect, Archaeologist and Heritage Officer to guide and inform owners.



- Where a building is derelict, measures should be taken to support and protect the building from collapse prior to and during works.
- Address the incremental damage and cultural loss of settlements and their settings due to the lack of awareness, vacancy and demolition.
- Use the NIAH building and garden survey to inform policy and planning.
- Consider the inclusion of all structures identified by the NIAH and recommended by the Minister for Culture, Heritage and the Gaeltacht in the Council's Record of Protected Structures and that all such structures be regarded as '*Candidate Protected Structures*', pending verification by the Council and inclusion in the Record of Protected Structures.
- Mitigation of negative impact on historic character areas and urban landscape in relation to large ground scrappers as well as tall buildings through the consideration of design criteria and guidance to safeguard the historic built heritage context.
- Include objectives to develop disaster risk reduction policies addressing direct and indirect risks to the architectural heritage in its area.
- Include objectives to develop resilience and adaptation strategies for the architectural heritage in Co. Leitrim.
- Develop the skills capacity within the Local Authority to address adaptation / mitigation / emergency management issues affecting historic structures and sites to avoid inadvertent loss or damage during climate change adaptation or mitigation works.
- Promote best conservation practice and to lead by example through the management and safeguarding of historic properties in the ownership of the Local Authority.
- Compile core data information about the built and archaeological evolution of historic places, i.e. to monitor condition and vacancy to inform future development strategies and progress.
- Promote the protection, rehabilitation, revitalization and maintenance of the character and setting of vernacular buildings, farmyards and settlements, including historic gateways, boundaries and other features.
- Promote the protection and maintenance of thatched buildings and maintain an up-to-date record of thatched buildings, promote available grant schemes, and facilitate engagement with owners in the maintenance of these buildings.
- Consider concepts of historic urban landscapes – setting, topography and natural features, the conservation and reuse of early traditional structures in terms of the insertion of new buildings and managing their impact on the historic environment.
- Appoint a Local Authority multi-disciplinary team which communicates the historical and architectural context, focuses on the repair and upgrade of existing historic buildings, and guides new use adaptation regarding architectural character and significance.
- Heritage resilience and sustainability, consideration of appropriate measures to ensure the long-term survival of historic structures, their uses and their contribution to the sense of place.
- Develop Manorhamilton as a heritage town and to support an application to the Heritage Council under historic towns initiative.

### Response of the Chief Executive

The very extensive and detailed submission received from the Department of Culture, Heritage and the Gaeltacht is acknowledged. The Planning Authority would generally support most of the points raised therein. The Planning Authority will have regard to the detail contained therein in the preparation of the Architectural / Built Heritage section of the draft development plan.

The recommendation to appoint a Conservation Officer will be considered in the context of preparing the budget and other competing demands on limited financial resources.

The National Inventory of Architectural Heritage will be considered in the preparation of the draft development plan. The Planning Authority is presently reviewing the significant number of structures which were recommended for inclusion in the Record of Protected Structures which were not included previously. Regard must also be given to the fact that these surveys were undertaken in 2003 and the condition of certain buildings and structures will have changed in the intervening period.

There will be policy in the draft Plan to ensure the protection, sympathetic enhancement and sensitive reuse of Protected Structures or parts of Protected Structures, and the immediate surrounds included and proposed for inclusion in the Record of Protected Structures (RPS). Such structures are considered to be of special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest, together with the integrity of their character and setting. Furthermore, policy will be included to favourably consider the change of use of Protected Structures provided such a change of use does not adversely impact on its intrinsic character.

#### Heritage related Tourism

- Promote heritage sites through the arts and tourism-related activities.
- Incorporate a strong heritage policy with tourism as a priority.
- Protect, enhance and promote both our natural and built heritage for the common benefits of visitor, industry, community and the environment.
- Foster an understanding of the unique history and heritage of our places.
- Ensure consistent regional visions recognising our history.
- Investigate a 'Battlefield project' to preserve the Battlefield of 1270.

### Response of the Chief Executive

The value of heritage is increasingly recognized at national level as a vital economic driver, a focal point for tourism and a catalyst for both rural and urban development. The Council will continue to ensure the protection of the heritage assets of the county whilst seeking to exploit the tourism potential of such assets in a sustainable manner. A balance is required to ensure that the asset is not unintentionally damaged because of seeking to exploit economic opportunities arising from such sites. This balance is recognised in the Leitrim Heritage Plan 2020-2025 - this Heritage Plan aims to conserve and promote our natural, cultural and built heritage as a finite resource which contributes significantly to the maintenance of a healthy environment, sustainable farming, well-being, creativity and the creation of cultural and tourism jobs. The support of sustainable Heritage Tourism in Leitrim is one of the 4 objectives of the Leitrim Plan and 5 specific actions have been identified in this regard. The draft

development plan will be guided by the Heritage Plan with regard the formulation of the policy framework for heritage related tourism.

#### **Recommendation of the Chief Executive**

The Council proposes to continue to ensure the protection and sympathetic enhancement of the built heritage in Co. Leitrim and this will be reinforced in the draft development plan. The draft development plan will recognise Leitrim’s remarkable landscape, built heritage and archaeology and will seek to ensure both the protection and promotion of these features to benefit the county’s economy and people’s sense of place. The draft development plan will have regard to the County Heritage Plan 2020-2025 which seeks to connect all Leitrim residents with their shared heritage and to work together to conserve and celebrate Leitrim’s unique heritage, for the benefit of both present and future generations.

The draft development plan will include policies to:

- Protect, conserve and enhance buildings, areas, structures, sites and features of special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest. The Council will aim to strike a balance between conservation and development objectives in the interests of the proper planning and sustainable development of the county.
- Ensure the protection, sympathetic enhancement and sensitive reuse of Protected Structures or parts of Protected Structures, and the immediate surrounds included and proposed for inclusion in the Record of Protected Structures (RPS) that are of special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest, together with the integrity of their character and setting.
- Encourage the protection, conservation, promotion and enhancement of built heritage but also the protection of archaeological heritage in the county and support public awareness, enjoyment of and access to these sites where appropriate.

## **4.8 Climate Action and Energy**

#### **Submission Reference Numbers:**

**01/02; 01/06; 01/08; 01/09; 01/13; 01/30; 01/34; 01/36; 01/37; 01/40; 01/43.**

#### **Existing Development**

- New retrofitting programme of existing buildings required.
- Promote and support appropriate and well-informed energy efficiency upgrades to vernacular buildings through the dissemination of factual and relevant information to the public.
- Identify the architectural heritage in the Local Authority area that may be under threat, directly or indirectly, due to climate change.
- Include objectives to carry out climate change risk assessments for the historic structures and sites in the Local Authority’s functional area particularly those in the Authority’s own remit.
- Adopt a free BER assessment scheme.

- Dedicated funding to invest in upgrading BER Ratings, the provision of heat pumps and roof solar panels, all with the aim of reducing energy consumption.
- Carry out a carbon audit of existing building stock and retrofit with more insulated building fabric and sustainable technologies.
- Develop and implement an energy management programme for all public buildings.
- Promote Green Schemes to reinvigorate communities.

### Response of the Chief Executive

The requirement to address the adverse effects of climate change and to adhere to meeting national commitments to reduce reductions in greenhouse gas emissions is both acknowledged and accepted. The importance of improved Building Energy Rating Certificates and the installation of appropriate heating systems is accepted. It is considered however that issues relating to the availability of incentives and retrofitting schemes do not have a specific spatial or land use planning dimension and would be more appropriately addressed by plans and programmes of other Public Bodies such as the Sustainable Energy Authority of Ireland. The Council will strive to meet our obligations regarding the energy usage of Council owned buildings and our own housing stock.

### New Development

- Ensure that climate considerations are fully integrated into the planning of new projects and their design. All future development should have a green procurement approach, which incorporates carbon pricing and climate criteria into decision making. Environmentally friendly proposals such as building typologies that minimize the use of energy, the use of low carbon materials, increased SUDS management initiatives and green infrastructure, water recycling and conservation; green roofs, use of photovoltaic or rainwater harvesting and the integration and utilization of open space should all be incorporated into the design stage. It is recommended that all developments should document their climate action and energy efficiency proposals at the planning stage.
- Opportunity to be a leader in the promotion of innovative, low carbon, renewable energy design and technology in the provision of Local Authority housing.
- Promote use of hemp in construction.
- Nature based solutions for the better management of urban problems such as flooding, biodiversity loss, etc. should be explored and integrated into the design of public areas.
- Support the development of community solar farms.
- Support the development of small-scale anaerobic digesters.
- Support and promote the Better Energy Communities Scheme to enable communities around the country develop new and innovative, locally based solutions to energy poverty.
- Develop new key skill sets in areas such as green procurement, carbon accounting, carbon management and energy management.

### Response of the Chief Executive

The draft development plan will include policies and objectives to promote and support the transition to a low carbon and climate resilient society in line with the requirements of the NPF. In addition, the draft development plan will provide policies for the sustainable management of water, waste and other environmental resources. The draft development plan will reflect the importance given to Climate

Action in the NPF and RSES by including consistent policies and objectives that integrate climate action at a local level. The draft development plan will recognise and promote the benefits of anaerobic digestion in line with EU and national waste management legislation and policy.

### **Flooding**

- Providing for climate change impacts on flooding by avoiding development in areas prone to flooding in the future, providing space for future flood defences, specifying minimum floor levels and the need to set specific development management objectives.
- Consider the risk of coastal change or erosion, including potentially increased risks due to climate change.
- Provide for flood protection measures to be delivered in a planned and strategic manner subject to environmental assessment.
- OPW advise that clear commitments and strategic objectives regarding flood risk should be included in the draft development plan and an undertaking given to correctly implement and abide by the *'Planning System and Flood Risk Management Guidelines'* (2009).
- OPW request that the plan has full regard to the proposed development of flood relief schemes in Carrick-on-Shannon, Leitrim and Mohill, to ensure that zoning or development proposals do not impede or prevent the progression of these measures.

### **Response of Chief Executive**

The draft development plan will be prepared in accordance with the Planning System and Flood Risk Management Guidelines (2009). A comprehensive Strategic Flood Risk Assessment and Management Plan will be carried out in the preparation of the plan. It is noted that Dromod has been excluded from the centres which have flood relief schemes prepared for in the submission from the OPW although this is considered an oversight.

### **Renewable Energy Strategy**

- Consult with neighbouring Planning Authorities to ensure a consistent approach across county boundaries and include a strong element of public consultation and dialogue with all stakeholders.
- Include a map which identifies areas suitable and unsuitable for the siting of wind turbines and sensitive areas such as tourism facilitates or assets.
- Adopt the LARES approach to the preparation of the new Renewable Energy Strategy.
- The plan must be progressive and ambitious with clear and supportive policies in favour of further wind energy development.
- Establish a Regional Steering Group for Renewable Energy.
- The Northern and Western Assembly RSES has excellent policies in relation to grid development and Coillte requests that these are mirrored in the new Leitrim County Development Plan.
- Designating large areas as being unsuitable due to the application of broad-brush strategic level constraints can severely limit the site selection process, reduce the ability to meet national targets and can also artificially restrict highly suitable sites from being brought forward. It is suggested that the Council do not apply a blanket unfavourable designation in relation to areas designated as Areas of Outstanding Natural Beauty/Areas of High Visual Amenity, or alternatively, apply a similar designation to areas which are considered to have "low" wind speeds. An approach which requires further investigation of more defined designations within sensitive sites is called for.

- In order to avoid an over reliance on wind energy, other renewable energy options such as solar, hydropower, biomass and geothermal energy should all be explored and facilitated

### Response of Chief Executive

A draft Renewable Energy Strategy has been prepared and will inform the policy framework contained in the draft development plan. The LARES approach has been followed in its preparation and is one of the first Renewable Energy Strategies to do so. The draft Renewable Energy Strategy will identify areas of windfarm potential and allow for the development of appropriate policies which recognise the need to improve and expand energy infrastructure in the county and region whilst also taking cognisance of the potential impacts on the landscape and the natural environment. The impact of turbines on the landscape was considered separately and informed the resultant strategy. The draft Renewable Energy Strategy looks at the potential of all types of renewable energy and not just wind energy. The Planning Authority will publish the Strategy separately from the draft County Development Plan.

### Energy

- Ensure that the long-term operational requirements of existing utilities are protected.
- Protect the county's future capacity for the development of electricity transmission and distribution infrastructure.
- EirGrid requests that the new development plan explicitly supports the reinforcement and strengthening of the electricity transmission network with reference to the regionally important projects such as Renewable Integration Development Programme. This project will identify the optimum reinforcement of the electricity transmission grid in the north and the north-west of the island.
- EirGrid also requests the new development plan be explicit as to how the various Government and State Agency policy documents have been considered, and how they have informed the policy and objectives being pursued in the draft development plan.
- The new development plan should reflect EirGrid's need for robust policies to develop the electricity grid in a safe and secure way. This is necessary to meet projected demand levels, to meet Government Policy and to ensure a long-term, sustainable and competitive energy future for Ireland. The new development plan should facilitate the development of grid reinforcements including grid connections and a transboundary network into and through the county and between all adjacent counties and to support the development of international connections.
- Consider the recommendations from the Good Energies Alliance Ireland 'Cróga' report 2019.
- Investigate community projects to harvest electricity from waterways
- The new development plan should include policies and objectives that support infrastructural developments increasing renewable capacity or resilience of the transmission/distribution systems.
- Include specific policy objectives for renewable energy, renewable energy resource development and the associated strengthening and improvement of the electricity transmission network.
- Safeguard existing strategic energy corridors from encroachment by other developments that could compromise the delivery of energy networks.
- Robust policies will assist the Council in ensuring a continued emphasis on the positive interactions between both the energy and tourism potential of the County.
- Opportunity to create a target of 'Net Zero Carbon Leitrim' by 2030.
- Develop a Climate Plan for the county.



- Every decision regarding development must be climate proofed and must have regard for national emissions and mitigation targets.

### Response of the Chief Executive

The draft development plan will encourage the production of energy from renewable sources, such as from biomass, waste material, solar, hydro, geothermal and wind energy, subject to normal proper planning and environmental considerations.

The draft development plan will incorporate policies to support a safe, secure and reliable supply of electricity. The Council welcomes plans to reinforce and expand electricity infrastructure across the county to attract investment and provide for the future development of the county. In particular, the policy framework will provide for the development, reinforcement and expansion of the electricity transmission and distribution grid, including the development of new lines, pylons and substations as required to provide for the future physical and economic development of the county and wider region. The submission from E.S.B. will continue to be used as a reference document in the formulation of the relevant section of the draft development plan.

The draft development plan will incorporate policies to support a safe, secure and reliable supply of electricity. The Council welcomes plans to reinforce and expand electricity infrastructure across the county to attract investment and provide for the future development of the county. The preparation of the development plan will continue to be informed by the detailed submission from the ESB.

The draft development plan will provide support for the implementation of EirGrid's (2017) Grid Development Strategy - *'Your Grid Your Tomorrow'* investment programme, subject to landscape, residential amenity and environmental considerations.

### Wind Energy

- The need to adopt a regional approach to the spatial planning of wind farm developments.
- Align the development plan policy framework with national commitments on climate change mitigation and adaptation.
- It will be necessary to extend the areas that will be considered suitable for wind farm development into slightly more sensitive landscape areas
- There is significant potential within Co. Leitrim's upland /moorland landscapes to accommodate wind energy infrastructure without resulting in significant adverse effects on the receiving landscape.
- Irish Wind Energy Alliance recommends classifying a sufficient quantum of land as being suitable for wind energy in order to ensure that national renewable energy targets can be achieved and demonstrate how the quantum of land classified as being suitable is sufficient for this purpose. The quantum of land identified as potentially suitable for wind energy development must go far beyond the actual amount required, to allow for a natural attrition rate across development sites and projects.
- Remove any time limiting conditions on permissions for wind farm developments.
- Consider the ongoing investment and economic development benefits during the construction and operational lifespan of wind farms.

- Acknowledge that the siting of wind energy developments in upland areas may be subject to significant environmental constraints.
- Consider direct and indirect impacts of the draft development plan on greenhouse gas emissions and removals (Mitigation).
- Consider direct and indirect impacts of climate change on the implementation of the draft plan, e.g. the resilience of critical water service infrastructure to flooding and drought (Adaptation).
- Consider the linkages between mitigation and adaptation (Inter-relationships).
- The key aims of Leitrim’s Climate Change Adaptation Strategy 2019-2024 should be integrated into the development plan.
- Ireland’s Greenhouse Gas Emissions Projections for 2018-2040 (EPA, 2019), Integrating Climatic Factors into the Strategic Environmental Assessment Process in Ireland (EPA, 2019) and Ireland’s Environment – An Assessment 2016 (EPA, 2016) should be taken into account into the preparation of the draft development plan.
- Set specific targets for greenhouse gas reduction and outline achievable actions that seek to combat, reduce or eliminate the emissions of greenhouse gases. Key indicators for monitoring of progress on climate action must be outlined to ensure progress is achieved.

### Response of the Chief Executive

The importance of wind energy as a potential energy source and its associated potential impacts are duly noted. The National Climate Change Adaptation Framework published in 2018 includes the national strategy to reduce the vulnerability of the country to the negative effects of climate change and avail of positive impacts. The transition towards a low carbon and climate resilient society is one of the 10 National Strategic Outcomes contained in the NPF. This will require reducing greenhouse gas emissions from the energy sector by at least 80% by 2050, which includes the shift from predominantly fossil fuels to predominantly renewable energy sources. The development plan must also be consistent with the policy framework contained in the RSES. The RSES notes that the forthcoming Renewable Electricity Policy and Development Framework will aim to identify strategic areas for the sustainable development of renewable electricity projects of scale, in a sustainable manner, compatible with environmental and cultural heritage, landscape and amenity considerations. The development of the Wind Energy Guidelines and the Renewable Electricity Development Plan will also facilitate informed decision making, in relation to renewable energy infrastructure.

The draft development plan will continue to promote the development of renewable energy sources where such developments can be assimilated into the receiving environment. The impact on landscape is a key consideration along with issues of peat stability and the impact upon the communities close to such developments. The areas of highest wind speed potential usually correlate with upland areas which are being promoted for their tourism potential and areas designed for environmental and landscape designations. The key aims of Leitrim’s Climate Change Adaptation Strategy 2019-2024 will be integrated into the development plan.

### Recommendation of the Chief Executive

The draft development plan will include policies and objectives that are informed by the requirement to adhere to meeting committed EU and national energy targets. The importance of factoring climate change into the draft development plan is acknowledged and the plan will have regard to the National Climate Change Adaptation Framework, Building Resilience to Climate Change (2012) and the Climate Action Plan to Tackle Climate Breakdown (2019). The draft development plan will promote the development of all forms of renewable energy infrastructure in the county, including wind, solar PV, solar thermal and seasonal storage technologies, etc. subject to environmental safeguards and the protection of natural or built heritage features, biodiversity, views and prospects. The draft development plan will support the development of wind energy in suitable locations in an environmentally sustainable manner in accordance with Government policy, the Landscape Character Assessment and the Renewable Energy Strategy.

The draft development plan will incorporate policies to support a safe, secure and reliable supply of electricity which assists EirGrid in their grid development programme, as set out in the Grid Development Strategy – Your Grid, Your Tomorrow, 2017 and Tomorrow’s Energy Scenarios 2017: Planning our Energy Future, 2017. The draft Plan will support the provision of carbon neutral and low carbon solutions in housing developments in accordance with the requirements of the relevant national, regional and local plans.

It is recommended that the following policies be included in the draft development plan:

- Support the transition to a competitive, low carbon, climate-resilient and environmentally sustainable economy by 2050, by way of reducing greenhouse gases, increasing renewable energy, and improving energy efficiency.
- Co-operate and liaise with statutory and other energy providers in relation to power generation in order to ensure adequate power capacity for the existing and future needs of the county, region and country.
- Support the National Dialogue on Climate Action contained in the Programme for Government in an effort to increase awareness of climate change, achieve behavioural change and adaptation actions.
- Encourage the production of energy from renewable sources, such as from biomass, waste material, solar, hydro, geothermal and wind energy, subject to normal proper planning considerations, including in particular, the potential impact on areas of environmental, ecological or landscape sensitivity.
- To support the NWRA in the realisation of RPO 4.16 in co-ordinating the identification of potential renewable energy sites of scale in collaboration with Local Authorities and other stakeholders within 3 years of the adoption of the RSES. The identification of such sites (which may extend to include energy storage solutions) will be based on numerous site selection criteria including environmental matters, and potential grid connections.
- Have regard to the *“Planning System and Flood Risk Management – Guidelines for Planning Authorities”* (DoEHLG/OPW, 2009) through the use of the sequential approach and application of the Justification Tests for Development Management and Development Plans.
- Require the use of sustainable urban drainage systems (SuDS) in order to reduce the potential impact of existing and predicted flooding risks.

## 4.9 Biodiversity and Landscape

### Submission Reference Numbers:

01/06; 01/13; 01/16; 01/36; 01/45.

### Biodiversity

- Protect and strengthen biodiversity levels by providing guidance on the location of where invasive monoculture tree species can or cannot be planted within the county so that forestry activity can be aligned with local landscape character, high nature value lands, and other community objectives such as retaining and maintaining population and statutory / community services and infrastructure. Many other environmental considerations such as protecting and conserving bird populations, many other habitats, wetlands, peats, water quality etc. must be included in the assessment.
- Include objectives relating to proposals to increase access to areas such as Lough Allen.
- A dedicated Biodiversity section should be included in the development plan.
- Address the Invasive Species issues affecting Co. Leitrim.
- Include an objective requiring an '*Ecological Impact Assessment (EclA)*' for any proposed development which may have a significant impact on listed rare and/or threatened species.
- Include strong objectives in relation to the protection of wetlands and peatlands within the county.
- Include an objective to support the implementation of the National Raised Bog Special Areas of Conservation Management Plan 2017-2022.
- Promote the need to protect non-designated aspects of biodiversity including ecological corridors/linkages/green infrastructure and areas of important local biodiversity incorporating any relevant habitat mapping.
- A Biodiversity Action Plan should be developed which aims to conserve and restore biodiversity and ecosystem services in the wider countryside.
- Towns and villages in Leitrim should be explored to identify areas where biodiversity can be integrated into the urban fabric.
- All towns and villages in the county should commit to preparing and implementing a pollinator plan.
- The Department of Culture, Heritage and the Gaeltacht recommends that the County Development Plan includes an objective to protect proposed Natural Heritage Areas which have not been designated and to list them as core ecological features in the plan. Consequently, Natural Heritage Areas, proposed Natural Heritage Areas and their site synopses and or the relevant habitats / species for which they are proposed or designated should be included in an appendix to the plan. The Department also welcomes the inclusions of '*Biodiversity Sites of Value*' and '*Non-Designated Sites*' in the development plan and the recognition of these sites in the wider countryside.
- A clear and specific monitoring plan should be included with the Strategic Environmental Assessment Report that will clearly outline how it is proposed to record the impacts of the Plan's implementation on biodiversity, both in terms of biodiversity loss and biodiversity enhancement during its lifetime. This type of monitoring during plan implementation will allow for corrective action and intervention if environmental damage is noted.
- Investigate the development of a county or regionally held, publicly accessible repository for consultants undertaking environmental assessments.

## Landscape

- The Landscape Character Assessment should be reviewed.
- The proposed landscape capacity assessment should include dedicated sections on the capacity of nature conservation interests and biodiversity to continue to absorb large scale conifer afforestation.
- Forestry activities such as clear fell leave a high level of environmental destruction and scaring on the landscape.
- The development plan must assess and designate areas routes, landscapes, natural assets and other features which need to be retained and maintained in a natural state to support the developing tourist sector. These areas need to be protected from plantation development and forestry activity impacts.
- To protect lakeshores from the adverse effects of inappropriate development.

## Response of the Chief Executive

The Council recognises the need to protect Leitrim's unique landscape and biodiversity. The draft development plan will include specific policies relating to the conservation of biodiversity, landscape and natural heritage. The Council seeks to integrate biodiversity considerations in a positive, proactive and precautionary way in line with the RSES.

The draft development plan will seek to protect and enhance the county's landscape, by ensuring that development retains, protects and, where necessary, enhances the appearance and character of the county's existing landscape. In May 2019, Leitrim County Council commissioned consultants to undertake a review of the Landscape Character Assessment of County Leitrim, published in 2002. This has been completed but has not yet been published. It will form part of the draft County Development Plan when published next summer.

The draft development plan will incorporate policies and objectives for the protection of the landscape. It is the intention of the Planning Authority to also undertake a capacity assessment of the landscape to continue to assimilate tracts of forestry. This will inform the resultant policy framework to be contained in the draft County Development Plan.

In addition, a review of the designated landscapes (Areas of Outstanding Natural Beauty and Areas of High Visual Amenity) along with the recorded 29 Views and Prospects is also underway. These designations have been readopted from one Development Plan to the next over the past number of decades and it was considered necessary to review these elements of the landscape policy of the new draft County Development Plan.

The detailed submission from the National Parks and Wildlife Section of the Department of Culture, Heritage and the Gaeltacht is extremely informative and will be used as a reference in the preparation of the relevant sections of the development plan.

The Leitrim Heritage Plan 2020-2025 acknowledges that biodiversity forms the basis of our landscapes, provides for food and clean water supplies, opportunities for waste disposal, nutrient recycling, flood storage and regulation, among many others. The Leitrim Development Company is currently developing a five-year local Biodiversity Action Plan for County Leitrim. This initiative is part of the overall strategic vision for the Rural Development LEADER Programme in County Leitrim that strives towards a vibrant

and healthy rural community. The preparation of the draft development plan will have regard to the Biodiversity Plan when prepared noting that it is an action of the Heritage Plan to support its implementation when finalised.

#### Recommendation of the Chief Executive

The draft development plan will ensure the protection and conservation of the quality, character and distinctiveness of Leitrim’s landscape in accordance with RPO 5.2. The Draft Plan will include policies to:

- Protect, conserve, and seek to enhance the County’s biodiversity.
- Continue to support the protection and management of existing woodlands, trees and hedgerows which are of amenity or biodiversity value and/or contribute to landscape character, and to strengthen local networks.
- Protect existing green infrastructure within the county and provide additional green infrastructure where possible.
- Support the aims and objectives of the All Ireland Pollinator Plan 2015-2020.
- Continue to deliver and support measures for the prevention, control and/or eradication of invasive species within the county.

#### 4.10 Water Services and Environment

##### Submission Reference Numbers:

**01/02; 01/03; 01/13; 01/16; 01/36; 01/39; 01/42.**

##### Waste Management and Pollution

- Implement the Waste Hierarchy set out in the Waste Framework Directive and place prevention and minimization at the forefront of any waste policy.
- Disposal of municipal waste to landfill should be a last resort.
- Include community waste prevention demonstration programmes, which provide skills to develop waste reduction and prevention within local communities.
- Provide easily accessible public recycling bins.
- Promote feasible reuse options before embarking on the purchase of new goods.
- More waste bins are required in public areas.
- The Department of Culture, Heritage and the Gaeltacht recommends that the draft development plan explicitly acknowledges that Leitrim contains the upper catchment of the River Shannon and highlights the potential for pollution that enters this watercourse in Leitrim to disperse down the entire river course and significantly impact ecological features outside of the county.
- Participating in and facilitating national programmes of air quality monitoring.
- Working to develop and promote the Air Quality Index for Health.
- Develop Local Air Quality Management Plans that identify pollution ‘hot spots’ and aim to reduce pollution through local action on emissions.



### Response of the Chief Executive

The Chief Executive generally accepts the points raised in this section and measures aimed at reducing waste and air pollution will be included as specific policies in the draft development plan. The Council will continue to work with the EPA in relation to monitoring of air quality and the development of Local Air Quality Management Plans as deemed necessary.

The draft development plan will acknowledge that Leitrim contains the upper catchment of the River Shannon and highlight the potential for pollution that enters this watercourse in Leitrim to disperse down the entire river course and significantly impact ecological features outside of the county.

#### Water Supply

- Ensure the provision of safe secure drinking water and promote the reduction in waste and overuse of water.
- Water usage audits of public buildings should be carried out and water conservation measures implemented.
- Provide grants for households to harvest rainwater.
- Promote water conservation and demand management measures among all water users and support Irish Water in implementing water conservation measures such as leakage reduction and network improvements.
- Promote opportunities for natural water retention measures to reduce run-off and provide other benefits such as to water quality, biodiversity, etc.
- Work closely with Irish Water to identify and facilitate the timely delivery of the water services required to realise the development objectives of the development plan; the available capacity of the public water services infrastructure; the need to protect and optimize existing and planned public water services infrastructure; the need for sequential and phased development, and; the financial and environmental implications of development in sensitive areas.
- Prior to granting planning permission, the Planning Authority should ensure that adequate water services will be available to service the development and that existing water services are not negatively impacted. The Planning Authority shall require developers to provide evidence of consultation with Irish Water prior to applying for planning permission.
- Protect existing wayleaves and buffer zones around public water services infrastructure through appropriate zoning and facilitate the provision of appropriate sites for required water services infrastructure, as necessary.
- Protect both ground and surface water resources including taking account of the impacts of climate change, and to support Irish Water in the development and implementation of Drinking Water Safety Plans and the National Water Resources Plan.
- Provide adequate storm water infrastructure to accommodate the planned levels of growth within the development plan area and to ensure that appropriate flood management measures are implemented to protect property and infrastructure.
- Require all new development to provide a separate foul and surface water drainage system and to incorporate sustainable urban drainage systems where appropriate in new development and the public realm.
- Prohibit the discharge of additional surface water to combined (foul and surface water) sewers to maximize the capacity of existing collection systems for foul water.

### Wastewater

- Support Irish Water in the promotion of effective management of trade discharges to sewers to maximize the capacity of existing sewer networks and minimize detrimental impacts on wastewater treatment works.
- Ensure that all new developments connect to the public wastewater infrastructure, where available, and encourage existing developments that are near a public sewer to connect to that sewer, subject to a connection agreement with Irish Water.
- Ensure all wastewater treatment plants can operate effectively with their current demand and future demand, and that private effluent treatment and domestic septic tanks are fit for purpose.
- Refuse residential development that requires the provision of private wastewater treatment facilities (i.e. Developer Provided Infrastructure), other than single house systems.
- Irish Water recommend that the provision of single house septic tanks and treatment plants in the Development Plan area should be strongly discouraged to minimize the risk of groundwater pollution. Where such facilities are permitted, full compliance with the prevailing regulations and standards, including the EPA's Code of Practice Wastewater Treatment and Disposal Systems Serving Single Houses (PE. ≤10) (EPA 2009), as may be amended, will be required.
- Ensure that private wastewater treatment facilities, where permitted, are operated in compliance with their wastewater discharge license, to protect water quality.
- The development plan should ensure that it seeks to not only protect the water resources in the county but also seeks to enhance them.

### Response of the Chief Executive

The capacity of an individual urban centre to accommodate future growth is dependent on the capacity of both water and wastewater infrastructure. The critical role of Irish Water in providing such infrastructure is acknowledged and the need for continued co-operation with the Local Authority to ensure that our growth ambitions are aligned to Irish Water's investment priorities. The Local Authority will continue to engage with Irish Water to ensure that the future demands of the county and projected growth levels are provided for. This will include policies that seek to improve water conservation measures. SuDs and rainwater harvesting standards will be included in the Development Management standards chapter of the new development plan noting that these measures cannot be included in areas at risk from flooding from ground water sources. The Water Framework Directive and River Basin Management Plans will be key considerations for the preparation of the draft plan. Standards for the protection of groundwater are provided by the European Communities (Groundwater) Regulations 2010. The draft plan will also support the implementation of the EU Water Framework Directive (WFD) which aims to improve the water quality of all our waterbodies (rivers, lakes, estuaries and coastal waters) and the River Basin Management Plan for Ireland 2018-2021 which sets out the actions that Ireland will take to improve water quality and achieve 'good' ecological status in water bodies by 2027.

### Aggregate Resources

- The future provision of aggregate resources must be planned, monitored and managed now to ensure a sustainable supply of these materials to provide for Ireland's future infrastructure development.
- The development plan should have regard to and make provision for the protection of strategic aggregate resources.

- Give due regard to the information contained in the Geological Survey Ireland Aggregate Potential Mapping resource maps when considering policy for the protection and zoning of raw material reserves.
- Provide stakeholders with the opportunity to inform Planning Authorities on the location of substantial strategic aggregate reserves.
- Restrict development of aggregate extraction, processing and associated concrete production where it impacts on public rights of way or walking routes.

### Response of the Chief Executive

The Council acknowledges the finite nature of aggregate resources in the county and will have regard to all available resource mapping in the preparation of the draft development plan. The submission on behalf of the Irish Concrete Federation will be considered in the preparation of this section of the County Development Plan notwithstanding the document being generic in nature rather than specific to Co. Leitrim.

### Recommendation of the Chief Executive

The draft development plan will facilitate the provision of high quality water supply and wastewater infrastructure and the Local Authority will continue to work closely with Irish Water to facilitate the timely provision of water services infrastructure within the county in line with Council's Core Strategy and Settlement Strategy.

The draft development plan will strive to achieve '*good status*' in all water bodies in compliance with the Water Framework Directive, the River Basin Management Plan and the associated Programme of Measures and to co-operate with the development and implementation of the National River Basin Management Plan 2017-2021. The draft development plan will provide a policy framework that accords with related legislation.

It is recommended that policies in the draft development plan should seek to:

- Liaise and co-operate with Irish Water in the implementation and delivery of the 'Water Services Strategic Plan (2015)', the 'Irish Water Business Plan 2015-2021', the future 'Irish Water National Water Resource Plan' and the future 'Irish Water Investment Plan 2020-2024' (or any amendment thereof) and other relevant investment works programme of Irish Water.
- Work in conjunction with Irish Water to protect existing water supply and wastewater infrastructure, to maximise the potential of existing capacity and to facilitate the timely delivery of new water supply and wastewater infrastructure to facilitate future growth in accordance with the Core Strategy and Settlement Strategy.
- Require developments to connect to public water supplies where available.
- Promote the sustainable use of water and water conservation in existing and new development within the County and encourage demand management measures among all water users.
- Co-operate and support Irish Water to eliminate untreated discharges from settlements.
- Ensure that proposed wastewater treatment system for development in unserved areas complies with the EPA Code of Practice.

- Have regard to and conform with policies and objectives contained in Irish Water’s National Wastewater Sludge Management Plan.
- Ensure adequate surface water drainage systems are in place which meet the requirements of the Water Framework Directive and the associated River Basin Management Plans.
- Limit and manage the permitted stormwater run-off from all new developments.
- Promote the use of green infrastructure in the interests of flood mitigation and climate change adaptation.
- Require the use of Sustainable Urban Drainage Systems, where practicable.

#### 4.11 Rural Development

Submission Reference Numbers: 01/08; 01/13; 01/16; 01/24; 01/30; 01/36; 01/38; 01/39; 01/41; 01/43.

##### Agriculture

- Reform of the CAP system required to reward high nature farming.
- A localized community-based approach around the issue of land use needs to be explored.
- Recognition of the constraints to the further development of agriculture within the county (with regard to the prevailing soil types and fertility levels) and the formal recognition of the county’s capacity and potential for high nature value farming.
- Leitrim is well positioned to take advantage of the ‘*European Green Deal*’ which has tied future CAP funding to the greening of agriculture including organic production and nature friendly farming.
- Encourage and facilitate the sensitive reuse of vernacular houses or farm buildings for farm diversification, agri-tourism and rural development, including self-catering accommodation, arts or craft workshops and small-scale manufacturing.
- Farm fencing, particularly in upland, highly scenic or amenity areas, should not normally be permitted unless such fencing is essential to the viability of the farm
- The impact of the loss of economic activity from farming in comparison to that from forestry activities must be examined. There are alternatives for many of our farmers if the value of the land for carbon storage, sequestration, for maintaining biodiversity and providing other vital environmental good and for tourism / recreational services is recognised and funded properly through government policy. The Teagasc mapping of High Nature Value farmlands should be considered an important aspect for the future land use and biodiversity protection in the county and influence a land use policy in the new County Development Plan.

##### Response of Chief Executive

The Council recognises equally the opportunities and constraints of County Leitrim and the draft development plan will seek to support agriculture practices including agricultural diversification. The consideration of the specifics on agricultural policies such as CAP are respectfully considered as being outside the remit of spatial or land use planning frameworks and are more appropriately addressed by other plans and programmes of Government Departments or by other Public Bodies. The development plan cannot remove statutory exemptions for rural development which include fencing of land unless it contravenes a stated condition or limitations contained in the Planning and Development Regulations 2001-2020.

### Afforestation

- Address the imbalance in forestry development in Leitrim – must not allow Leitrim to become a sacrifice zone for increased and aggressive plantation to mitigate inaction in other counties and areas.
- Protect and promote access to forests.
- Set up an organisation to explore the future use of land / lakes and new technologies with engagement from all stakeholders.
- Consideration should be given to developing county level thresholds that support the conversion of existing conifer plantations and or the creation of new native woodlands (managed via continuous woodland cover) as a counterweight to historic forestry practices in the county.
- Encourage agro-forestry.
- Coillte requests that the new development plan supports sustainable rural based enterprises such as forestry and promote the use of sustainable timber products.
- Local Government involvement in strategic forestry planning and management and in developing a land use strategy for Leitrim can help protect areas and people in the county affected by over afforestation. This could be started through a broad and representative county stakeholder forum.
- Forestry land use policy in Leitrim must be laid down in the County Development Plan – a responsibility to protect people, biodiversity and environment in the way it manages and influences the plantation of forestry at the county level.
- No new or replacement coniferous forests should be allowed on summits generally above 250 metres.
- This plan must develop and document a clear policy direction of forestry and sustainable land use in Leitrim.
- Determine and define the maximum allowable commercial afforestation level in all areas and to determine a rate increase over the period of the plan in order to protect rural communities and population against the negative impacts over afforestation.
- Develop and publish guidance at the county level to indicate where and how plantation is suitable, restricted, and not allowed.
- The cumulative impact of planting without EIA is queried.
- Fire risk associated with blocks of plantations which are likely to demand increasing resources and planning from the Fire Services. Access routes, escape routes and fire breaks must be defined and planned in the County Development Plan and the industry / sector must contribute to this and the costs of this in order to protect the local residents / citizens, businesses, etc.
- Limits and restrictions must be developed in the new development plan to ensure that sustainable and viable communities with diverse economic opportunities can co-exist alongside the very high level of plantation forestry already in place in the county.
- Rural houses are being surrounded by Scandinavian trees and the opportunity costs are nature economy, rewilding economy, sustainable rural communities, and pride - nobody is proud to live in Sitka Spruce landscapes and have tree harvesting on their doorsteps.
- The forests that are planted are very dark and a blot on the landscape and when they have been cut down, the ground looks like a battlefield. There needs to be incentives to plant more native trees which are far better for the environment.
- Protect Leitrim's soil carbon stocks by preventing the plantation of forestry on existing carbon sinks where significant carbon stocks situated in these soils are likely to be released because of the plantation development activity.
- Impact on biodiversity, water quality, and on public infrastructure (such as roads, bridges) particularly at harvesting stages.

- The environmental and biodiversity impact of forestry needs to be assessed in the development plan so that further developments and activities can be assessed.
- Consider the provision of planning polices / land use zoning objectives to support the provision of infrastructure/development on Coillte lands to provide, for tourism, commercial, community and other uses which would support and enable national, regional and local policy objectives.
- The industrialisation of the landscape with plantation forestry can and will impact on the attractiveness of the county for tourism.
- Access routes for cyclists, driving tourists, walkers and other recreational tourists are impacted with the heavy processes of thinning and clear fell harvesting and haulage.
- Soil runoff during these activities is also a problem for angling activities and the waterways.
- Afforestation has negative impacts on tourism.
- The findings of the consultation on forestry activity in the county carried out through the Public Participation Network should be examined and incorporated into the development plan.
- Opportunity to balance local objectives and needs with the public interest and wider policy consideration.
- Vigorously defend Leitrim's right to equality in national policy and consult with the people and places of the county.

### Response of Chief Executive

The Council acknowledge the considerable number of views in relation to afforestation in the county.

County Leitrim has now the highest ratio of planted area of any county in the state having surpassed Co. Wicklow and is fast approaching double the national average. Private forests account for just over half (51.3%) of the forest area in the county although this figure is now growing year on year. Conifers account for 70% of the total forest area in Co. Leitrim. Sitka spruce is the dominant species accounting for 61.3% of the total forest area. The growth rates of trees in the county are high; for Sitka spruce in private stands growth rates are estimated to be 20% higher than the average in private stands nationally. Native species account for 30.7% of the forest area in Co. Leitrim which is slightly higher than the national figure of 26.6%.

The Strategic Issues Paper acknowledges that whilst forests and woodlands can have a significant recreational and amenity value in addition to sustaining 309 full time equivalent jobs associated with forestry/wood processing in Co. Leitrim (2017), the introduction of large scale forestry areas can have negative impacts visually, socially and environmentally and thus must be appropriate in terms of scale and location. Leitrim County Council is commissioning a capacity assessment of the ability of the landscape to continue to absorb large scale afforestation.

The Department of Agriculture, Food and the Marine decide on all forestry applications which include planting, felling, forest access roads and the creation or material widening of entrances onto non-national roads for forestry related developments. The Council, as a referral body, will provide advice to seek to ensure that only development which is compatible with the Landscape Character Assessment and the draft development plan policy framework is carried out. There is considerable frustration however in the failure of the submissions from the Local Authority to date influencing the Forest Service in their decision making.

The various submissions received will be considered in further detail in the preparation of the relevant section in the draft development plan.

#### **Chief Executive's Recommendation**

It is recommended that the draft County Development Plan incorporate the following policies:

- Promote the growth of rural enterprises and activities that are resource dependent.
- Support the vision of carbon neutrality in agriculture and forestry through better sustainable agricultural, land management and resource efficiency.
- Support the development of agriculture where it is compatible with the sustainable development of the county and commensurate with sustaining the farming community.
- Ensure that forestry development does not have a negative visual impact on the countryside or cause pollution or degradation to wildlife habitats, natural waters or European designated sites.



## 5. Recommended Policies to be included in the draft County Development Plan 2022 - 2028

### 5.1 Core Strategy

#### Background

- The population was recorded at 32,044 people in 2016.
- The RSES for our region project that the population of Co. Leitrim will increase to 35,000 – 35,500 people by 2026 and to 37,000 by 2031.
- Depending on using ESB data for new connections or Geo Directory confirmed new residential addresses, an additional 227 – 260 households have been established in Leitrim since the last Census in 2016.
- Work is ongoing to determine the estimated population base of 2020.
- The population growth to be accommodated over the 6-year period of the next County Development Plan is likely to be of the order of 1,800 – 2,100 people or 300 – 350 people per annum. This also needs to be translated into households.

1. To determine a Core Strategy and Settlement Hierarchy in accordance with the hierarchy and guiding principles provided in the RSES for the Northern and Western Region within the population projections set out in the National Planning Framework (NPF) to ensure that towns grow at a sustainable and appropriate level.
2. The Development Plan will pursue a compact growth policy and seek better integration of transport and land use planning in accordance with the requirements of the NPF and RSES.
  - a. As required pursuant to **RPO 3.1**, to develop urban places of regional scale through delivering significant compact growth in Carrick on Shannon (Key Town) and developing identified derelict and under utilised sites, with an initial focus within the town core.
  - b. As required pursuant to **RPO 3.2** (RSES) and **NPO 3c** (NPF), to deliver at least 30% of all new homes that are targeted in Carrick on Shannon within the existing built-up footprints on infill and/or brownfield sites. The built-up footprint of the settlement is that defined by the CSO (footnote of RPO 3.2).
3. Prepare a new Housing Strategy to inform housing policy in the County Development Plan. A Housing Need Demand Assessment (HNDA) will be undertaken to support the preparation of the Housing Strategy.
4. To direct at least 30% of the population growth for Co. Leitrim over the life of the Development Plan to Carrick on Shannon identified as an urban place of regional scale (Key Town) for accelerated population growth in the RSES. (This is requirement of the RSES – Section 3.3 Placemaking. <sup>1</sup>)

<sup>1</sup> The National Planning Framework provides a target growth rate for Galway between 50%-55% to 2040. This RSES has targeted the Letterkenny, Sligo and Athlone Regional Growth Centres to grow their population by at least 40% to 2040 and the Key Towns to have a targeted growth of at least 30%, relative to Census 2016 (See Tables 3 and 4 respectively). Page 41 RSES

5. To prioritise the development of Carrick on Shannon, a designated Key Town in the RSES, as a driver of economic development in the county.
6. To pursue balanced growth elsewhere within the county at an appropriate scale based upon the varied growth potential of different places to include individual houses in rural areas. The rationale for this shall be identified within the Core Strategy of the Development Plan. The greatest proportion of residential growth after Carrick on Shannon will be directed to Ballinamore and Manorhamilton. Thereafter, the Core Strategy will target housing and employment growth into settlements that have the capacity to absorb such growth in a sustainable manner.
7. To formulate a rural housing policy for the open countryside which will seek to balance the need to sustain rural communities with the need to protect Leitrim's natural heritage, environment and landscape qualities.
8. The Rural Housing policy will differentiate between the pressure for one off housing in the areas surrounding large towns (Carrick on Shannon and the impact of Sligo extending into Co. Leitrim) where an economic and social tie to an area must be established from the remainder of the countryside.
9. To support the appropriate and sustainable development of rural areas by encouraging growth and arresting decline in areas that have experienced low population growth or decline in recent decades and by managing the growth of areas that are under strong urban influence to avoid over-development, while sustaining vibrant rural communities. (**NPO15** refers).
10. As required pursuant to **RPO 3.3**, to deliver at least 20% of all new housing in rural areas on brownfield sites. This shall include development proposals which seek to bring back into use vacant / semi derelict properties.
11. As required pursuant to **RPO 3.7**, to identify and prioritise a program for the provision of serviced sites within smaller towns and villages. A rolling 2-year implementation plan shall subsequently be prepared.
12. To promote Carrick on Shannon as the main retail centre in the County with the provision of retail in other centres commensurate with their roles.
13. To support the vitality and viability of existing town and village centres and facilitate a competitive and healthy environment for the retailing sector by ensuring that future growth in retail floorspace responds to the identified retail hierarchy, the sequential approach, and the needs of the projected population of the settlement areas.
14. To create the appropriate conditions necessary to foster a healthy and vibrant retail environment in the county.
15. Include objectives to support proposals for regeneration, rejuvenation of vacant and derelict sites, town and village centre renewal and public realm enhancement.

## 5.2 Land Use Zoning

1. The Development Plan will adopt an evidence-based approach to land-use zoning and settlement planning including demonstrating a rational assessment of zoned land requirements based on such criteria as regional population targets, the sequential approach, flood risk assessment, infrastructure capacity, environmental / ecological designations and Section 28 Guidance.
2. Any land zoned for residential development will be in proximity and/or be well connected to existing / planned services (e.g. schools, retail, community/health centres, sports/amenity facilities, etc.) and employment sites.
3. To facilitate the expansion of and provision of new mixed-use and employment-generating development within towns and villages at an appropriate size and scale subject to normal planning requirements.

## 5.3 Housing Strategy

1. Prepare a new Housing Strategy to inform housing policy in the County Development Plan. A Housing Need Demand Assessment (HNDA) will be undertaken to support the preparation of the Housing Strategy.
2. Include a policy on residential density that requires new residential development to comply with the standards set out in the Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities (DEHLG 2009). This however needs to be qualified by requiring a tailored design approach for new residential development which is responsive to local context and the submission of a design statement with planning applications which shall outline the design rationale being proposed.
3. Include a policy to require a mix of house types, house designs and sizes in new residential and mixed-use schemes to cater for the varying household needs in the County.
4. To apply an agreed social housing requirement (currently to a maximum of 10%), pursuant to Part V of the Planning and Development Act 2000, as amended, to land zoned for residential use, or for a mixture of residential and other uses, except where the development would be exempted from this requirement. The requirement shall be determined through the preparation of the Housing Strategy.
5. To promote social integration and the provision of a range of dwelling types in residential developments that would encourage a mix of tenure, particularly in any State funded house building programmes.
6. To promote the active use of above ground floor levels in principal shopping streets including living over the shop.
7. To support a coherent and consistent approach in the identification and monitoring of the scale of housing vacancy within the county, identifying vacancy hotspots and informing the setting of actions, objectives and targets in Action Plans and identify how these might best be achieved. (RPO 3.6 refers).

8. Include policy to support active land management including giving effect to the Urban Regeneration and Housing Act, 2015 and the Urban and Rural Regeneration and Development Funds.
9. Include policy to identify obsolete and potential renewal areas within town and village centres and where feasible pursue measures to regenerate and bring these areas back into use.
10. Review policy and design standards relating to height and design of new residential development to ensure their compliance with new policy particularly the Specific Planning Policy Requirements (SPPRs) of the Urban Development and Building Heights Guidelines for Planning Authorities (DHPLG 2018) and Sustainable Urban Housing: Design Standards for New Apartments - Guidelines for Planning Authorities (DHPLG 2018).
11. Include a policy to require, where practicable, new residential development to incorporate the principles of universal design in accordance with the *National Disability Authority Centre for Excellence in Design Universal Design Guidelines for Homes in Ireland (2015)*.
12. Include a policy to require that the design and layout of new residential development achieves highly permeable, well connected streets in accordance with best practice as set out in the Design Manual Urban Roads and Streets (DTTS & DECLG 2013), where practicable.
13. To promote appropriate densities and high quality of design and layout for new multiple unit residential developments.
14. To ensure that multiple residential schemes contain a mix of house types to cater for different user needs.
15. To ensure new developments incorporate a high level of permeability for walking and cycling.
16. To ensure that adequate and appropriate critical service infrastructure should be in place, or required to be put in place, to service permitted development during the lifetime of the Plan.

#### **5.4 Economic Development, Enterprise and Employment**

1. To support new employment development in appropriate locations that will improve economic resilience and reduce the need for unsustainable commuting patterns out of the county.
2. To direct significant employment growth into the Key Town of Carrick on Shannon and also into the Sub Regional Growth Centres of Ballinamore and Manorhamilton as determined by the Settlement Hierarchy and to put in place an investment prioritisation programme which supports placemaking for enterprise development.
3. To determine a series of measures to address job creation and retail leakage in the smaller towns in the Settlement Hierarchy. The plan shall seek to identify sites or opportunities to support economic development and employment consistent with national, regional and local policies.
4. To ensure that entrepreneurialism and enterprise is promoted, that smaller, local businesses are fully supported and that the development of co-working spaces / hubs is facilitated.

5. To ensure that the policy framework is sufficiently flexible to take account of unexpected opportunities, to accommodate valid propositions for enterprise development that may emerge and for which there are strong locational drivers that do not apply to the same extent elsewhere.
6. To review all land zoned for economic development in accordance with national, regional and local policy. Lands identified for employment development will be located proximate to existing or proposed residential areas.
7. To clearly articulate what uses are permitted or open for consideration on employment zoned land and shall ensure that such uses afford adequate flexibility to cater for a wide range of employment uses subject to respecting residential amenity and environmental protection.
8. To support job creation and enterprise development with an emphasis on an enterprise base with increased productivity and more diversification, with high levels of innovation.
9. To build upon and strengthen the conditions necessary to facilitate and support start-up businesses, niche market industry, tourism and small and medium enterprises.
10. To promote and facilitate shared working hubs which act as a counterbalance for out commuting for residents.
11. To maximise opportunities to strengthen links with third level institutions and Sligo IT in particular and investigate opportunities in relation to climate change, biodiversity and developing a carbon neutral economy.
12. To identify policies to support the transition towards a low carbon economy including objectives to support green infrastructure.
13. To promote the growth of rural enterprises and activities that are resource dependent.

#### **5.5 Carrick on Shannon Key Town - Future Priorities:**

1. Develop and expand the potential of the Carrick Business Campus and explore the opportunity to attract people intensive use of the modern existing buildings.
2. Deliver support to existing businesses in Carrick-on-Shannon to ensure their continued existence and expansion.
3. Promote research and development opportunities, building the capacity of the region.
4. Promote the potential of the Metropolitan Area Network fibre optic cable managed by eNET.
5. Progress the sustainable development of the serviced strategic employment land that is available to the east of the town.
6. Development of the tourism offer and the thriving Purple Flag Status of the town that supports a variety of support enterprises in the surrounding countryside.

7. Deliver on the Blueway development under the Upper Shannon Erne Future Economy project (USEFE); It will develop tourism in the rural areas of Cavan, Leitrim, Longford and Roscommon, connecting 22 towns and villages located alongside the River Shannon and the Shannon-erne Waterway. Influence and assist with the broader economic development and job creation in the region. Carrick-on-Shannon is strategically located within this Blueway.
8. Prepare a joint Local Area Plan with Roscommon County Council to include the village of Cortober to deliver an integrated framework for the future development of the urban area within 3 years of the adoption of the RSES.
9. To support the development of a sustainable transport solution to the town which alleviates the existing levels of congestion on the N4 and regional road network serving the town.
10. To support the development of a regional multi sports facility in the town.
11. To identify and develop quality green infrastructure, within and adjacent to the urban centre.
12. To pursue the development of a town destination centre to strengthen the town centre as a destination of choice and improve retail attractiveness.
13. Complete town centre public realm improvements with focus on placemaking and delivering increased footfall / dwell time.
14. Working collaboratively with the Office of Public Works to deliver the flood relief scheme.
15. Pursue the sustainable development of the new regionally significant opportunity site to the east of the town and contiguous to the existing land use zoning envelope for use as a data centre or alternative regionally scaled employment use following a feasibility study. Access would potentially be from a National Primary Road (outside of reduced speed limit zone) and careful consideration of options is required. This will require inclusion of an exceptional circumstance for a new entrance off the N4 to be agreed with the TII in accordance with the Spatial Planning and National Roads Guidelines. In terms of Power Supply, it is considered this site is well placed, given the proximity of Flagford (220kv) and represents a regionally significant opportunity, which by its nature would be appropriately located outside an urban area, but adjacent to existing strategic employment lands.
16. As required pursuant to **RPO 4.9** and **RPO 4.11**, to ensure provision is made for the expansion in accommodation and facilities together with necessary supporting infrastructural investments, including the upgrade of Public Transport infrastructural facilities and improvements in the public realm, transport links, accommodation, the night time economy, and sustainable development of our natural & built economy.
17. As required pursuant to **RPO 4.10**, to ensure Orientation and Information Points targeted at 'Slow Tourism' market are provided as an enabler for increasing bed-nights, and visitor numbers.

## 5.6 Other Towns and Villages – Regeneration and Place Making

1. To support the regeneration and renewal of towns and villages in rural areas (RPO 3.4 refers).
2. In accordance with NPO 16 and NPO 18a and to support further applications for RRDF funding, to include objectives to:
  - a) Target the reversal of rural decline in the core of towns and villages through sustainable targeted measures that address vacant premises and deliver sustainable reuse and regeneration outcomes.
  - b) Support the proportionate growth of and appropriately designed development in rural towns that will contribute to their regeneration and renewal, including interventions in the public realm, the provision of amenities, the acquisition of sites and the provision of services.
3. To promote compact growth principles and adopt measures to encourage the refurbishment of existing buildings and development of brownfield/infill sites, derelict and vacant sites.
4. To ensure the provision of high-quality housing and well-designed developments to make places more attractive and contribute to the quality of the public realm, promote healthy place-making and improve the quality of life for residents and visitors.
5. To require high quality architectural design in retail and commercial developments in order to make positive contribution to our urban centres.
6. To promote casual trading (including farmers markets) in the retail centres of towns where it can create an ambiance which can contribute to the vitality and viability of such centres.

## 5.7 Tourism

1. Have regard to the recommendations in the A Growth Strategy for Tourism in Leitrim 2015-2021 including the midterm review and any replacement Strategy prepared to facilitate the development of a sustainable tourism industry that is economically viable and respectful of the natural landscape and built heritage.
2. To develop additional walking trails, cycling infrastructure, greenways and blueways considering the potential health and wellbeing benefits for local people and tourists. These are subject to prioritisation and satisfactory liaison with relevant outside bodies, landowner agreement, planning consent and funding provisions.
3. To strike a balance in accommodating the needs of a thriving tourism sector whilst protecting biodiversity, natural and built heritage and the natural landscape.
4. To support the promotion of Ireland's Hidden Heartlands and the Wild Atlantic Way, in addition to co-ordinating and liaising with relevant bodies on the development of the tourism asset of Co. Leitrim.
5. To ensure provision is made for the expansion in accommodation, and facilities within key destination towns in Co. Leitrim, together with necessary supporting infrastructural investments, including improvements in the public realm, transport links, public transport provision,



accommodation, the night-time economy, and sustainable development of our natural and built economy.

6. To develop the SLNCR (Sligo Leitrim Northern Counties Railway) Greenway and Cavan and Leitrim Railway Greenway during the course of the County Development Plan as part of a Regional & intra-Regional cycleway network to support the expansion of the county as an attractive destination for tourists, potentially linking and extending a number of existing Greenway projects that are in operation, or in planning on an All Island basis.
7. As required pursuant to RPO 5.20, to support, and facilitate the continued development of the Shannon Blueway: Drumshanbo – Carrick on Shannon – Roosky – Lanesborough and of the Shannon Erne Blueway: Ballinamore – Ballyconnell - Belturbet.
8. As required pursuant to RPO 5.21, to promote, support and enable collaborative networks to realise the economic opportunities presented by Blueways.

### 5.8 Transportation

1. The Local Authority liaising with Roscommon County Council, the NTA, TII and other stakeholders shall prepare a Local Transport Plan (LTPs) for Carrick on Shannon / Cortober (**see RPO 6.26**). The output of this approach shall deliver more effective integration of land-use and transport planning for the combined urban centre.
2. In accordance with National Development Plan investment commitments and **RPO 6.7** of the RSES, to progress the N4 Carrick on Shannon to Dromod scheme through pre-appraisal and early planning in the short term and shall thereafter proceed to construction and be delivered to an appropriate level of service within the lifetime of the RSES.
3. To ensure that Electric Vehicle charging infrastructure and secure cycle parking facilities are provided in all developments, where practicable.
4. To support sustainable and compact forms of development and manage development, outside of identified settlements, to safeguard and have minimal impact on the carrying capacity, efficiency and safety of the strategic national and regional road network.
5. To agree a limited number of any existing and proposed access points on National Primary Roads outside of restricted speed limit areas as exceptional circumstances with the TII in accordance with the Spatial Planning & National Roads Guidelines for Planning Authorities (2012).
6. To adopt land use patterns that safeguard the road network and provide for sustainable mobility.
7. Incorporate design solutions for greater pedestrian and cycle movement, facilitate the use of sustainable modes of transport, integrate spatial planning with transport planning and enhance regional accessibility, thereby reducing carbon emissions and providing a healthier environment for residents and visitors.
8. To facilitate development of the road network in accordance with the National Development Plan and with Government policy and have regard to the Spatial Planning & National Roads Guidelines

for Planning Authorities 2012, ensuring that the safety, strategic transport function and efficiency of national roads and associated junctions will be maintained.

9. To acknowledge the important role rural transport services perform in providing for social inclusion and economic connectivity by seeking to expand the service which is currently provided.
10. The capacity and efficiency of the national road network drainage regimes in County Leitrim will be safeguarded for national road drainage purposes.

### 5.9 Climate Change and Adaptation

1. To position Climate Change as an overriding consideration / theme in the new County Development Plan. The section in the Development Plan will seek to integrate climate change mitigation and adaptation as guiding principles and to address the areas of:
  - i. Compact growth and crafting more sustainable settlement patterns.
  - ii. Sustainable and low carbon transportation.
  - iii. Enhancing public transport and access to same while recognising the rural nature of the county.
  - iv. Flooding, surface / storm water management.
  - v. Natural resource management.
  - vi. Renewable energy.
  - vii. Low energy building design.
2. In the development of the new plan, particular regard will be taken of the need to align with national commitments on climate change mitigation and adaptation.
3. To support the implementation of the Leitrim County Council Climate Change Adaptation Strategy and to support the land use aspects of the strategy.
4. To support the transition to a competitive, low carbon, climate-resilient and environmentally sustainable economy by 2050, by way of reducing greenhouse gases, increasing renewable energy and improving energy efficiency thereby aligning the Development Plan with national commitments on climate change mitigation and adaptation.
5. To support the National Dialogue on Climate Action contained in the Programme for Government in an effort to increase awareness of climate change, achieve behavioural change and adaptation actions.
6. To have regard to the “*Planning System and Flood Risk Management – Guidelines for Planning Authorities*” (DoEHLG/OPW, 2009) through the use of the sequential approach and application of the Justification Tests for Development Plans and Development Management.
7. To require the use of Sustainable Urban Drainage Systems (SuDS), where practicable, in order to reduce the potential impact of existing and predicted flooding risks.
8. To limit and manage the permitted stormwater run-off from all new developments to equate to the pre development greenfield run off rate.

9. To promote the use of green infrastructure in the interests of flood mitigation and climate change adaptation.

### **5.10 Water Services Infrastructure / Water Quality**

1. To facilitate the provision of high-quality water supply and wastewater infrastructure in urban centres across the county.
2. To co-operate with Irish Water to protect existing water supply and wastewater infrastructure, to maximise the potential of existing capacity and to facilitate the timely delivery of new water supply and wastewater infrastructure to facilitate future growth in accordance with the Core Strategy and Settlement Strategy.
3. To pursue and support Irish Water in the upgrade of the Carrick-on-Shannon Water Treatment Plant as a project necessary to deliver the growth model outlined in the Core Strategy of the new County Development Plan.
4. To require developments to connect to public water supplies where available.
5. To promote the sustainable use of water and water conservation in existing and new development within the County and encourage demand management measures among all water users.
6. To co-operate and support Irish Water to eliminate untreated wastewater discharges from settlements.
7. To ensure that individual wastewater treatment systems for development in unserved areas complies with the EPA Code of Practice.
8. To have regard to and conform with policies and objectives contained in the Irish Water's National Wastewater Sludge Management Plan.
9. To strive to achieve 'good status' in all water bodies in compliance with the Water Framework Directive, the River Basin Management Plan and the associated Programme of Measures and to co-operate with the development and implementation of the National River Basin Management Plan 2017-2021.
10. To ensure adequate surface water drainage systems are in place which meet the requirements of the Water Framework Directive and the associated River Basin Management Plans.

### **5.11 Broadband, Telecommunications and Energy**

1. The Council will facilitate service providers in the development of key telecommunications infrastructure and assist in the roll out of the National Broadband Plan.
2. To support a safe, secure and reliable supply of electricity which assists EirGrid in their grid development programme, as set out in the Grid Development Strategy – Your Grid, Your Tomorrow, 2017 and Tomorrow's Energy Scenarios 2017: Planning our Energy Future, 2017.

3. To co-operate and liaise with statutory and other energy providers in relation to power generation in order to ensure adequate power capacity for the existing and future needs of the county, region and country.
4. To adopt the Renewable Energy Strategy and seek to realise the potential for renewable energy identified in the Strategy.
5. To encourage the production of energy from renewable sources and the development of renewable energy infrastructure, such as from biomass, waste material, solar, hydro, geothermal and wind energy, subject to planning considerations, including in particular, the potential impact on areas of environmental, ecological or landscape sensitivity.
6. To support the development of wind energy developments of appropriate scale in suitable locations in accordance with Government policy, wind energy guidelines the Landscape Character Assessment and the Renewable Energy Strategy.
7. To support the Northern and Western Regional Assembly (in the realisation of RPO 4.16) in co-ordinating the identification of potential renewable energy sites of scale in collaboration with relevant stakeholders within 3 years of the adoption of the RSES. The identification of such sites (which may extend to include energy storage solutions) will be based on numerous site selection criteria including environmental matters, and potential grid connections.

## 5.12 Heritage

1. As required pursuant to **RPO 5.3**, the Council supports the consideration of the zone of North Leitrim and North Sligo (Benbulbin and its hinterland) as a potential National Park /National Recreation Area. The Council supports collaboration in this regard with stakeholders including NPWS, NRWA, Sligo County Council and the Dept. of Culture, Heritage and the Gaeltacht.
2. To strike a balance between conservation and development objectives in the interests of the proper planning and sustainable development of the county.
3. To update and review the Record of Protected Structures having regard to the recommendations of the National Inventory of Architectural Heritage.
4. To ensure the protection, sympathetic enhancement and sensitive reuse of Protected Structures or parts of Protected Structures, and the immediate surrounds included and proposed for inclusion in the Record of Protected Structures (RPS) that are of special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest, together with the integrity of their character and setting.
5. To encourage the protection, conservation, promotion and enhancement of built heritage but also the protection of archaeological heritage in the county and support public awareness, enjoyment of and access to these sites where appropriate.
6. To protect, conserve, and seek to enhance the County's biodiversity.

7. To continue to support the protection and management of existing woodlands, trees and hedgerows which are of amenity or biodiversity value and/or contribute to landscape character, and to strengthen local networks.
8. To protect existing green infrastructure within the county and provide additional green infrastructure where possible.
9. To incorporate as objectives of this Development Plan, where appropriate, specific actions contained in the Leitrim Heritage Plan and to continue to support the role of the Heritage Officer in securing funding opportunities to develop heritage projects across the county.
10. The new Development Plan shall promote the need to increase awareness of and the protection of non-designated aspects of biodiversity including ecological corridors / linkages / green infrastructure, areas of important local biodiversity, etc.
11. To continue to deliver and support measures for the prevention, control and/or eradication of invasive species within the county.
12. To pursue the establishment of a Regional Fora that shall prepare an audit of worked out bog's and peatlands within the Northern and Western Region and to identify strategic sites and propositions of regional value, including but not limited to areas such as renewable energy, tourism, biodiversity, climate mitigation, education, recreation and amenity. (Refer to **RPO 5.23**).

### **5.13 Rural Development**

1. To pursue the establishment of a Regional Fora to set out a framework for sustainable afforestation across the Northern and Western Region that enables government policy to grow the sector and that addresses community concerns and perceptions. (Refer to RPO 5.24).
2. To ensure that forestry development does not have a negative visual impact on the countryside or cause pollution or degradation to wildlife habitats, natural waters or European designated sites.
3. To support the development of agriculture where it is compatible with the sustainable development of the county and commensurate with sustaining the farming community.
4. To facilitate the further development of the aggregate industry by permitting the continuation and extension of existing quarries and the development of new quarries, where such development does not adversely impact on human or animal health, the environment, existing infrastructure and the amenity value of neighbouring lands.
5. To manage the development of aggregate extraction, processing and associated concrete production where it impacts on public rights of way or designated walking routes.

### **5.14 Community Infrastructure**

1. To require that community facilities be appropriately located in towns and villages and are easily accessible for all sections of the community.
2. To encourage greater consideration for biodiversity in the design, layout and planting of open space areas.
3. To facilitate the development of primary health care centres, clinics, and facilities to cater for the specific needs of an ageing population in appropriate urban areas
4. To provide enhanced policy support and objectives in the new County Development Plan for community and social infrastructure.
5. To support and encourage the development of sporting leisure facilities, by the public, community and private sectors.
6. To ensure appropriate high-quality recreational and amenity facilities are available in urban and rural areas.
7. To work in conjunction with the Leitrim Sports Partnership in the development of sporting facilities in the County.
8. To liaise with and the Department of Education and Skills in order to facilitate the provision of education facilities in accordance with 'The Provision of Schools and the Planning System, A Code of Practice for Planning Authorities', (Department of Education & Science and DEHLG, 2008).
9. In areas where significant new housing is proposed, an assessment of need regarding schools provision should be carried out in collaboration with the Department of Education and Skills and statutory plans shall designate new school sites at accessible, pedestrian, cycle and public transport friendly locations.
10. To preserve identified Public Rights of Way where the public have a right of passage recognising that they provide valuable access to natural amenities and areas of natural beauty.

### **5.15 Social Inclusion**

1. To recognise the needs of people with special needs that live or work in the County or who choose to visit, and to support the provision of facilities for people with special needs.
2. To consider cultural diversity and ethnic minorities in planning for the needs of communities and to seek to consult with the relevant agencies representing or working within these groups.
3. To ensure that community facilities and social services provided are accessible to all individuals, communities and sectors of society, including people with disabilities, and marginalised and disadvantaged groups.
4. All new community buildings / facilities shall be designed to be universally accessible.

## 6. Appendix 1 – List of Submissions Received

Ref. No.	Organization / Person Making Submission	Date Received
01/01	Department of Transport, Tourism and Sport	02/07
01/02	Office of Public Works (Flood Planning)	14/07
01/03	Irish Concrete Federation	16/07
01/04	Linda Geraghty	21/07
01/05	TII	24/07
01/06	EPA	24/07
01/07	National Transport Authority	31/07
01/08	Coillte	07/08
01/09	Eirgrid	10/08
01/10	Joe McGivern o/b Aghoo Trial Blazers	10/08
01/11	Kathleen Geraghty, Linda Geraghty & Karen Geraghty	10/08
01/12	Gerard McPartland	11/08
01/13	HSE	11/08
01/14	Lyn Brookes	11/08
01/15	Jacqueline McAuliffe	11/08
01/16	Keep Ireland Open	11/08
01/17	James McLoughlin & Caroline Connolly McLoughlin	11/08
01/18	CLlr Felim Gurn	11/08
01/19	Geraldine Dunne	11/08
01/20	Rosemary O'Rourke	11/08
01/21	NWRA	11/08
01/22	Fergus McGowan	12/08
01/23	Thomas James Mc Gowan	12/08
01/24	Gerry Mc Crann	12/08
01/25	Department of Education and Skills	12/08
01/26	Manorhamilton Chamber	12/08
01/27	An Post	12/08
01/28	Claire Mc Girl	12/08
01/29	Rachel Keaney	12/08
01/30	Ballinamore Area Community Council / Town Team	12/08
01/31	Grace O'Rourke	12/08
01/32	John Gerard Cullen Solicitors o/b Mrs. Kathleen Geraghty	12/08
01/33	OPR	12/08
01/34	MKO o/b EDF Renewables	12/08
01/35	Ella Geraghty	12/08
01/36	Department of Culture, Heritage and the Gaeltacht	12/08
01/37	Irish Wind Energy Association	12/08
01/38	Noel Mac Lochlainn	12/08
01/39	Fáilte Ireland	12/08
01/40	ESB	12/08
01/41	Save Leitrim	12/08
01/42	Irish Water	12/08



<b>01/43</b>	Good Energies Alliance Ireland	12/08
<b>01/44</b>	Kathleen Coleman	12/08
<b>01/45</b>	Rev Richard Beadle	12/08

## 7. Appendix 2 – List of Prescribed Bodies Informed of the Development Plan Review Process

Number	Prescribed Body
1.	Minister for Housing, Planning, & Local Government
2.	An Bord Pleanála
3.	Minister for Agriculture, Food and the Marine
4.	Department of Culture, Heritage and the Gaeltacht
5.	Minister for Communications, Climate Action & The Environment
6.	Minister for Defence
7.	Minister for Education & Skills
8.	Minister for Transport, Tourism and Sport
9.	Minister for Business, Enterprise and Innovation
10.	Minister for Community & Rural Affairs
11.	An Chomhairle Ealaíon
12.	Commissioners of Public Works
13.	Dublin Airport Authority
14.	Eirgrid Plc
15.	Environmental Protection Agency Headquarters
16.	ESB Electric Ireland
17.	Fáilte Ireland
18.	Health Service Executive
19.	The Heritage Council
20.	Health & Safety Authority
21.	Inland Fisheries Ireland
22.	Transport Infrastructure Ireland
23.	An Taisce The National Trust for Ireland
24.	Irish Water
25.	National Transport Authority
26.	Office of The Planning Regulator
27.	Irish Aviation Authority
28.	Northern & Western Regional Assembly
29.	Cavan County Council
30.	Roscommon County Council
31.	Sligo County Council
32.	Donegal County Council
33.	Fermanagh & Omagh District Council
34.	Longford County Council
35.	Local Community & Development Committee

## 8. Appendix 3 – List of Other Stakeholders Informed of the Development Plan Review Process

Number	Prescribed Body
1.	North Connaught Youth Services
2.	Comhairle na nÓg
3.	Irish Wind Energy Association
4.	National Broadband Ireland
5.	Coillte
6.	Gas Networks Ireland
7.	IDA Ireland
8.	Enterprise Ireland
9.	Local Sports Partnership
10.	E Net
11.	Public Participation Network
12.	Digiweb
13.	Pure Telecom
14.	Sky Ireland
15.	Virgin Media Ireland
16.	Vodafone Ireland Limited,