



Planning Department
Leitrim County Council
Áras an Chontae
St. George's Terrace
Carrick on Shannon
Co. Leitrim
N41 PF67

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via email: cdp@leitrimcoco.ie

**RE: MATERIAL AMENDMENTS TO THE DRAFT LEITRIM COUNTY DEVELOPMENT PLAN,
2023 – 2029**

A Chara,

I refer to your notification on 26 October 2022 of Proposed Material Alterations to the Draft Leitrim County Development Plan 2023 – 2029 and inviting submissions / observations. The Northern and Western Regional Assembly ('the Assembly') wish to thank you for the opportunity to make this submission.

The Northern & Western Regional Assembly made a submission to Leitrim County Council on the Draft Plan in March 2022. The submission of the Assembly to Leitrim County Council contained 1 single Recommendation and 7 Observations. The Assembly generally noted the Draft Plan contained a significant degree of consistency with the RSES, and in overall terms, effectively reflected the principal ambitions of the Regional Strategy.

There are 101 proposed Material Amendments to the Draft Plan and this submission will provide commentary on the individual Recommendation / Observations made by the Assembly in March 2022 and the amended (or otherwise) policy position proposed by Leitrim County Council in respect of each. The submission will then offer commentary on whether the changes (if any) are consistent with Regional Policy. The report will additionally provide some analysis on a selection of the other Amendments, where they are deemed by the Assembly to be of Regional relevance.

Recommendation of the NRWA made to the Draft Leitrim Plan 2023 – 2029.

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

Outcome: MA 59 contains amendments to the text which amends the policy, and clarifies that Leitrim County Council does not intend to provide for exceptional circumstances for access / egress to the National Road Network. This clarification is welcome and is unequivocal in its wording.

Observations of the NWRA made to the Draft Leitrim Plan 2023 – 2029.

1. Consideration should be given to exploring opportunities to reduce the burden of text within the core document, particularly where it quotes (or summarises) from other policy statements, including the National Planning Framework & Regional Spatial and Economic Strategy (RSES)). The inclusion of links to documents and graphic design may assist in this regard.

Outcome: There are some strikethroughs contained within the 101 amendments, with commentary and background text removed. There is also some added text in respect of Amendments on the Core Strategy, particularly relating to annual monitoring of the Core Strategy regarding Housing Unit Targets at settlement level. However, the reduction in text is not significant in overall terms. It should be said the issue of very long documents / core documents within County Development Plans is not unique to Leitrim, and is an ongoing matter of concern, which has previously been raised by the Assembly and has also been acknowledged by the OPR as a matter to be addressed in the future. Finally, it should be highlighted this is not a matter which impacts Regional Policy in any event.

2. Should the Draft Plan be adopted in its present form, there will be an absence of zoned lands and constrained policy direction for Carrick-on-Shannon. The Planning Authority should consider options to fill this vacuum and provide greater certainty, enabling more planned sustainable development to occur.

Outcome: MA 3 seeks to amend Core Strategy Policy 9, and bring forward a Local Area Plan (LAP) for Carrick on Shannon and Cortober (Co. Roscommon) within 1 year of the adoption of this Leitrim CDP. The Amendment includes a new objective that this LAP will be informed by a Local Transport Plan (LTP). Core Strategy Obj. 9 commits to following the quantum of identified necessary residential land to be tied to the Core Strategy as set out in the Draft CDP, and this is to be welcomed, alongside the pillars of compact growth and sequential development which are built into the Policy Objective for the LAP process. This is acceptable, and is consistent with the RSES, and reflects the approach in other important Regional Urban Centres, where the approach of preparing LTPs ties with land-use planning.

3. The Plan be amended to explicitly include a policy objective and accompanying detail which gives effect to RPO 3.3, which seeks to ensure 20% of new rural development occurs on brownfield sites (ie. in towns/villages under 1,500 population and rural areas/countryside).

Outcome: MA13 Amends the Rural Strategy Settlements Objective to support the ongoing monitoring of new rural housing to ensure 20% of new rural development occurs on

brownfield sites including partially previously developed sites (i.e. in towns/villages under 1,500 population and rural areas/countryside). Additionally, MA 14 seeks to monitor the provision of single rural houses over the Plan period, having regard to the rural housing development target of 20% of all new housing in rural areas to be accommodated on brownfield sites (Rural Set Obj 4). Both of the Policy amendments are welcome, and give further effect to the ambitions of the RSES (People & Places).

4. The Development Plan would benefit from a clear elaboration on the provision of serviced sites in the smaller towns / villages of County Leitrim, including timeline for the roll-out of the programme, commitment to a 2-year implementation plan (RPO 3.7 refers) and commitment to the Council leading out on the initiative.

Outcome: MA15 details a significant commitment by Leitrim County Council in relation to RPO 3.7, and the new Policy (Rural Set Objective 7) is proposed to be amended as follows:

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

The Assembly welcome this initiative, and look forward to its advancement. Given the lack of overall housing supply / provision across the Region, such initiatives will be crucial to the growth of our towns and villages in Leitrim, and beyond.

5. The Plan should include a commitment to retain a record in relation to (i) developments comprising compact growth (ii) urban regeneration and (iii) housing constructed within the County's settlements, as part of its plan monitoring and evaluation.

Outcome: MA 1 is lengthy as it includes the addition of text in relation to how the new CDP will be monitored. The Assembly recognise Leitrim County Council have given significant consideration to this matter and has now committed to an Annual Monitoring of the Core Strategy, and indicate the inputs associated with the same will be across the whole Council organisation. The annual indicator measures to be monitored will reflect those within the recently published (DHPLG) Guidance on Core Strategy Monitoring. This is welcomed by the Assembly, and the forthcoming launch by the 3 Assemblies (aided by AIRO) of the RDM (Regional Development Monitor) as a source of Data, and Geo-Spatial information is anticipated to be a key asset for Leitrim and other Local Authorities in this regard.

6. Within Chapter 8, incorporate a Table and Map of Greenway/Blueway Projects confirming whether the projects are short / medium / long term ambitions, and associated time-frames.

Outcome: The suggested addition has not been included within the Material Amendments, however, there is detail set out within Chapter 8 (MA 53) in respect of existing and proposed Greenway / Blueway Projects, and these projects are tied to the Tourism Masterplan for the Shannon Region, and

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

Outcome: Material Amendments 88, 89 & 90 all contain new Policy instruments dedicated to the Bioeconomy, these are proposed to sit within Chapter 12 of the Plan (Climate action & Renewable Energy).

MA 88 incorporates a paragraph of text which provides commentary on the context of the Policy Objectives, referencing the National Statement on the Bioeconomy (2018) and the future ambitions set out therein, and also notes how the RSES gives effect to these Objectives.

MA 89 includes Policy Objective BEL 5, which seeks to support *the National Policy Statement on the Bioeconomy (Government of Ireland, 2018) and any review thereof, having consideration of the bio-economy's importance to rural Co. Leitrim and support the NWRA in its preparation of a feasibility study for the Northern and Western Region to identify (and map) areas of potential growth to inform the National Transition Agenda.*

MA 90 Includes a new Policy Objective BEL 6, *to support, in principle, the development of appropriately scaled local multi-feedstock bio-refining hubs across the region as well as the potential creation of bio-districts/clusters.*

This addition to the Policy Framework is welcome, and gives effect to RPOS 4.27 & 4.28 (Chapter 4 of RSES).

Commentary on Selected proposed MAs on the Draft Leitrim CDP 2023 -2029.

Landscape Capacity Study for Commercial Forestry: The Draft Plan, when published earlier in 2022 referenced a forthcoming Landscape Capacity Study for Commercial Forestry, this report (via RPS Consulting) has now been completed and is integrated into the Plan. The report is detailed, and runs to almost 150 pages, and assesses the County's various Landscape Character Types, with commentary on the suitability of the receiving areas, to absorb major plantations of Sitka Spruce or other fast growing species. Many of the upper reaches / foothills of the Mountains of North Leitrim, as well as the fringes of streams and lakes in South Leitrim have been deemed to be unsuitable host environments from a visual and environmental perspective, and this appears to be a justified conclusion. There are detailed maps within the Forestry Study which tie with the LCA carried out in the Draft Plan, and which are generally consistent with the overall goals of the Draft Plan.

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There are a series of MA's relating to forestry, (MA 65 being the most substantive) including commentary on context, which are inserted into Chapter 10 (Rural Development) of the Draft Plan. Some of the main elements of note include:

- Incorporation of the findings of the National Forestry Inventory (NFI - 2021) which states 20.1% of Leitrim's landmass is under forestry.
- Between 2011 - 2022, 42km of forestry roads were constructed in Leitrim, and this has a significant impact on the County's Road Network, and the Council do not recover anything close to the costs involved from those developing such access routes.
- Table 10.2 includes areas where the receiving Environment does not have the capacity to absorb further forestry plantations.
- There are 6 Policies on Forestry, and 5 objectives which have been revised in the Draft to allow for the Forestry Study to be integrated into the Plan.
- Leitrim County Council's future responses to Forestry / Planting applications will use the Study contained within this Plan to inform their position, and there are specific areas of the County where such applications will be opposed.

The RSES does acknowledge through RPO 5.24 that sustainable afforestation is something all stakeholders should work towards over the lifetime of the Strategy, and community concerns must be acknowledged within this process.

The Forestry Study assimilated into the Leitrim Plan is evidence based, and the Policies therein based on Landscape Types is innovative and is a proactive response by the Local Authority and is to be welcomed. If such an approach was replicated in other Councils, it is likely the issue of response to ongoing decline in the quality of the Region's water bodies may be enhanced.

Tourism Policy Updates: MA 21 details the Tourism Masterplan for the Beara / Breffni Way, which is a combination of 12 existing routes / way marked trails, which Failte Ireland is reviewing, with the intention of an overall infrastructure audit and review, and this is now to be reflected in the Plan. The Assembly welcome its inclusion and is consistent with RPO 4.14 (integration of tourist routes, including walking through the Region). There are multiple other amendments on Tourism MAs 21 – 35 including effecting Regional Failte Ireland policies, and DEPDs (Destination Experience Dev. Plans).

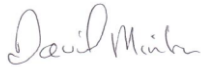
N-4: Carrick on Shannon Scheme - MA 58 relates to the updated policy on the N4 Upgrade (Carrick on Shannon to Dromod) and the new text reflects the preferred transport solution, announced in May 2022, which incorporates public transport & active travel components. This is consistent with the RSES, and RPO 6.7 in particular, which includes this scheme as part of the Regional ambition to bring enhanced Inter Urban connectivity to the North & West.

Conclusion

The NWRA commended Leitrim County Council in its Draft Leitrim Plan during its initial assessment of the document in March 2022 and would add that following the amendments there is now a very significant degree of consistency with the RSES Policies / Objectives across all areas, and this is to be welcomed, as is the commitment to monitor and review the Plan on a multi-annual basis.

If you have any queries in respect of the above, then do not hesitate to revert.

Le meas,



David Minton
Director