



Oifig an
Rialaitheora Pleanála
Office of the
Planning Regulator

12 August 2020

Planning Department,
Leitrim County Council,
Aras an Chontae,
St. Georges Terrace,
Carrick-on-Shannon,
Co. Leitrim
N41 PF67

Re: Issues Paper for the Leitrim County Development Plan 2022 – 2028

A chara

Thank you for your authority's work in preparing the *Leitrim County Development Plan 2022-2028 Issues Paper*. The Office acknowledges and welcomes the publication of this paper and your authority's work more broadly in advancing the review of the Leitrim County Development Plan (the plan).

In accordance with the provisions of section 31AM of the Planning and Development Act 2000, as amended (the Act), the Office is obliged to evaluate and assess development plans in the context of certain statutory parameters including:

- Matters generally to be contained in a development plan (section 10) and, in particular, section 10(2)(n) in relation to climate change;
- Consistency with the *National Planning Framework* (NPF) and the *Northern and Western Regional Assembly Regional Spatial and Economic Strategy* (RSES);
- Ministerial guidelines under section 28;
- Ministerial policy directives issued under section 29, and,
- Such other legislative and policy matters as the Minister may communicate to the Office in writing.

The Office has set out some comments for your authority to consider in formulating the draft plan.

These comments are offered without prejudice to any statutory observations and recommendations as may be forthcoming from the Office at future stages of the plan making process, and do not affect the obligation on your planning authority to comply with the relevant legislative requirements.

Core Strategy & Settlement Strategy

The formulation of the Core Strategy in line with section 10 of the Act is the most significant element in developing the planning authority's draft development plan.

The NPF and the RSES in addition to relevant specific planning policy requirements (SPPRs) specified in Ministerial guidelines under section 28 of the Act will be key determinants in making the Core Strategy for the planning authority's functional area.

One of the National Strategic Outcomes of the NPF is 'compact growth' which from an urban development perspective means, *'...we will need to deliver a greater proportion of residential development within existing built-up areas of our cities, towns and villages and ensuring that, when it comes to choosing a home, there are viable attractive alternatives available to people'¹*.

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'²*.

In this regard, the Office welcomes the statement regarding compact growth in the Issues Paper

'This applies to all scales of towns and villages within the County, from Carrick on Shannon to Tier 4 rural villages. This will require making better use of under utilised land including infill and brownfield sites.'³

As the planning authority will be aware, the NPF has a target population for County Leitrim of 35,000-35,500 by 2026 and 36,000-37,000 by 2031. This represents a population increase for the county of 3,000 to 3,500 people to 2026 above its 2016 census figure of 32,000.

The overall population target for the county in the Core Strategy 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.

1 Page 139 of the NPF

2 NPO 3c, page 159 of the NPF

3 Page 12 of the Issues Paper

In this regard, the Office 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...’

The Office notes the following statement from the Issues Paper

‘The Regional Spatial and Economic Strategy does not provide guidance to how the Settlement Hierarchy of Co. Leitrim should be arranged or what titles the different categories should be given.’⁴

In this regard, the Office advises that 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.

The Office will provide further practical advice and technical support in the working out of the Core Strategy parameters above and within our statutory remit as you may require.

Local Area Plans

The Office notes that one of the key future priorities for Carrick-on-Shannon in the RSES is to

‘Prepare a joint Local Area Plan with Roscommon to deliver an integrated framework for the future development of the urban area within 3 years of the adoption of this strategy.’⁵

In light of the above and given that the current local area plan (LAP) for Carrick-on-Shannon dates from 2010, the Office advises the planning authority to prioritise the preparation of the LAP in tandem with the preparation of the development plan if possible.

Regional Policy Objective (RPO) 6.27 supports the collaborative preparation of a Local Transport Plan (LTP) for Carrick-on-Shannon led by the planning authority in conjunction with the National Transport Authority (NTA) and other stakeholders, and for the LTP to inform the LAP. In this regard, the Office advises the planning authority to consult with the NTA, Transport Infrastructure Ireland (TII) and Roscommon County Council regarding the preparation of the LTP and LAP.

Acknowledging the emphasis placed on Leitrim and Roscommon County Councils working together to develop a joint LAP for Carrick-on-Shannon, and the timing for the preparation of the Roscommon County Development Plan 2021-2027, the Office would like to highlight the provisions of section 9(4) of the Act, which states:

4 Page 10 of the Issues Paper
5 Section 3.8.5, page 102 of the RSES

'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 Office 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. The Office can provide further advice to the planning authority on these matters if required.

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.

The Office notes the *'challenges facing town and village centres are evident in the number of vacant units in many of our towns and villages'*⁶.

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 standards⁷ for infill / brownfield development stating:

'In particular, general restrictions on building height or universal standards for car parking or garden size may not be applicable in all circumstances in urban areas and should be replaced by performance-based criteria appropriate to general location, e.g. city/town centre, public transport hub, inner suburban, public transport corridor, outer suburban, town, village etc.'

In this regard, there is an opportunity to review the current development management standards in Chapter 5 of the plan in particular the sections dealing with standards for residential and apartment development to ensure they are consistent with the relevant and any updated section 28 guidelines.

Economic Development & Employment

The Office notes the challenge in providing more jobs for the resident population and that *'...the 2016 Census figures indicated a significant fall in the number of jobs available in Co. Leitrim'*⁸.

6 Page 25 of the Issues Paper

7 Page 67 of the NPF

8 Page 14 of the Issues Paper

The Office also notes that the county experiences significant leakage of retail to other counties and welcomes the following statement in the Issues Paper:

*'It is necessary to develop a quality shopping and commercial environment in the County in order to combat dereliction and vacancy.'*⁹

While the current high jobs ratios in Carrick-on-Shannon places the town in a strong position to support sustainable growth, the Office considers that addressing job creation and retail leakage in the smaller towns will be significant issues for the forthcoming plan.

The Office 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, and in particular the principles in the section 28 guidelines on retail planning¹⁰ and national roads¹¹.

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.

In this regard, the Office endorses the statement

*'The integration of good land-use planning with transportation is essential for delivering reductions in the extent of our overall carbon footprint.'*¹²

In view of the greenhouse gas (GHG) emissions from transport (which are second only to agricultural emissions in terms of national emissions¹³) and the energy use for transport (highest energy use by sector, accounting for 43% total final consumption in 2017), 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 Office notes that the outbound commuter rate in 2016 was 44%, up from 40% in 2011¹⁴.

In view of the above, the Office would encourage the planning authority to include 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 in line with section 10(2)(n) acknowledging the dispersed nature of the county's population.

9 Page 15 of the Issues Paper

10 Guidelines for Planning Authorities Retail Planning (Apr 2012)

11 Spatial Planning and National Roads Guidelines (Jan 2012)

12 Page 18 of the Issues Paper

13 EPA: www.epa.ie/ghg/currentsituation/

14 Page 13 of the Issues Paper

The NPF sets out a two-tier approach to land zoning referred to as the tiered approach to land zoning. In this regard, the planning authority's attention is drawn to the requirement in NPO 72a which states:

'Planning authorities will be required to apply a standardised, tiered approach to differentiate between i) zoned land that is serviced and ii) zoned land that is serviceable within the life of the plan.'

Further information regarding the above is provided in Appendix 3 of the NPF: *A Methodology for a Tiered Approach to Land Zoning*.

In respect of the provision of wastewater and water infrastructure, 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. In this regard, the Office notes that the Carrick-on-Shannon Water Treatment Plant Upgrade is listed as one of a number of projects *'...necessary to deliver the growth model outlined in the RSES'*¹⁵.

Given the critical role that Carrick-on-Shannon will play in building critical mass and supporting sustainable growth, the Office 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 bypass¹⁶ 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 (as revised) 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.

¹⁵ Page 223 of the RSES

¹⁶ Page 41 of the National Development Plan

Rural Development

The Office 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.

Recognising ‘...*the continued demand for individual rural houses in the countryside...*’¹⁷, it is important that the forthcoming plan provides the appropriate balance between policies supporting rural housing in appropriate locations and those that proactively address issues of town / village decline and compact growth. In this regard, the plan’s policies will need to demonstrate consistency with NPO 19 and NPO 20¹⁸ and RPO 3.3 which seeks to ‘*deliver at least 20% of all new housing in rural areas on brownfield sites*’¹⁹.

In respect of NPO 19, the Office 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 be aware of the 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)*.

In this regard, the Office advises against the use of information from the Office of Public Work’s Preliminary Flood Risk Assessment (PFRA) and arterial drainage benefitting land maps to inform the SFRA. The planning authority will need to undertake adequate flood risk assessment to determine if there is sufficient information to inform zoning decisions or if further more detailed analysis is required.

17 Page 11 of the Issues Paper
18 Page 74 of the NPF
19 Page 38 of the RSES

Climate Action and Energy

The planning authority will be aware that the Office's evaluation of the plan is required under section 31AM(2)(a) to address, in particular, matters within the scope of section 10(2)(n) of the Act.

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 welcomes the following statement on page 30 of the Issues Paper:

'The new County Development Plan will have to demonstrate how the plan has integrated climate change mitigation and adaptation into its policies and objectives.'

Regarding climate change mitigation measures pertinent to section 10(2)(n), section 6.2 – Transport and section 6.3 – Transport Investment Priorities (including RPOs 6.27, 6.28, 6.29, 6.30, 6.31 and 6.32) of the RSES are of relevance regarding the integration of land use and transport planning.

The Office 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, in particular, 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).

Summary

In summary, the Office commends your authority for the preparation of this Issues Paper and for the explanations provided on a range of issues that will affect the forthcoming development plan.

The Office advises your authority to pay particular attention to the following issues in the formulation of the county development plan:

- National and regional objectives for population growth, compact growth and regeneration in determining the Core Strategy, including the settlement hierarchy for your functional area. In this regard, the Office advises that a significant proportion of the county's future population growth should be directed to Carrick-on-Shannon and other key settlements. This settlement hierarchy should also inform the quantum of land zoned for residential development in other settlements, with the allowance allocated to the rural remainder.
- The coordination of economic development and employment with population growth which capitalises on strengths such as the high jobs ratio in Carrick-on-Shannon and addresses challenges such as outbound commuting.
- The need to prioritise the preparation of a LAP for Carrick-on-Shannon informed by a LTP in tandem with the preparation of the development plan if possible.
- The inclusion of specific policies and implementation measures that encourage infill / brownfield development in the county's towns and the building of homes within the footprint of rural settlements. These policies and implementation measures should be specific, targeted, and measurable (i.e. include monitoring measures).
- The development of rural housing policies that are consistent with NPOs 19 and 20 of the NPF, and which in turn support the regeneration of rural towns and villages by directing residential development to serviced areas and facilitating more sustainable transport patterns. In particular, the Office 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.
- The need for consultation with transport agencies including the NTA and TII, and neighbouring planning authorities, during the preparation of land use and transport plans, and to ensure that policies and development management standards regarding access to national roads including exceptional circumstances are consistent with the *Spatial Planning and National Road Guidelines* (2012).
- The promotion of sustainable settlement and transport strategies for urban and rural areas with measures to reduce GHG emissions, reduce energy usage and to adapt to climate change. The plan should include targets for modal shift over the plan period aligned to specific implementation and monitoring measures.
- The promotion of renewable energy sources within the county in accordance with the relevant section 28 guidelines.

The Office looks forward to reviewing the plan and is committed to continued positive engagement with your authority in the implementation of national and regional policies at county and local level.

Please feel free to contact staff of the Office in the context of your authority's responses to the above, which we would be happy to facilitate. Contact can be initiated through the undersigned or at plans@opr.ie.

Yours sincerely,

A handwritten signature in black ink that reads "AM O'Connor". The signature is written in a cursive style with a diagonal slash at the end.

Anne Marie O'Connor
Deputy Planning Regulator

087 689 4771

Annemarie.oconnor@opr.ie