

5th April 2022

Planning Department
Leitrim County Council
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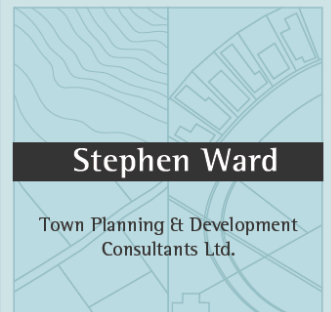
Via email to: cdp@leitrimcoco.ie

Dear Sir or Madam,

**SUBMISSION RE: DRAFT LEITRIM COUNTY DEVELOPMENT PLAN 2023-2029. LANDS
AT DROMOD, COUNTY LEITRIM.**

Yack Unlimited Company of 45 Kildare Street, Dublin 2, has retained Stephen Ward Town Planning and Development Consultants Limited to make this submission on the Draft Leitrim County Development Plan 2023-2029. Please address all correspondence to Stephen Ward Town Planning and Development Consultants Limited, Jocelyn House, Jocelyn Street, Dundalk, Co. Louth.

To assist Leitrim County Council in complying with the provisions of the Data Protection Act full details of our submission on behalf Yack Unlimited Company are attached. In summary this submission seeks that the 'Open Space' portion of the client's lands at Dromod, County Leitrim (outlined in Figure 1 of the attached submission) are re-zoned to 'New Residential', and that the northern portion of the site (zoned 'Enterprise & Employment') have its guidance section expanded to include *sui generis* uses.



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1.0 SITE LOCATION AND CURRENT ZONING OBJECTIVES

The lands under ownership of Yack Unlimited Company are located to the northern end of Dromod, between an existing residential area and the Dublin-Sligo railway line.



Figure 1 - Google Maps extract showing site context, approx. site boundaries in Blue

The site extends to c4.5 hectares. The southern lands (c1.82ha) are currently undeveloped, with the former beef processing plant on the northern lands (c2.63ha). It is bound to the north by woodland, to the north-east by the Dublin-Sligo railway line, to the south-east by open field and residential buildings, to the south by existing residential buildings and part of Dromod's village centre, and to the west by existing residential buildings. There is potential access from the lands to Cul na Sraide to the west.

2.0 DRAFT LEITRIM DEVELOPMENT PLAN 2023-2029

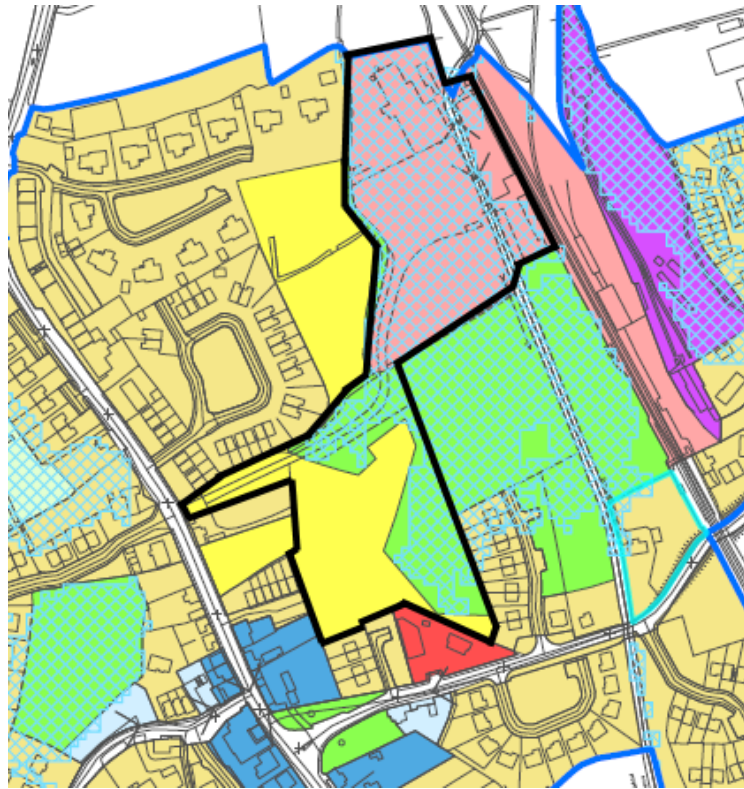


Figure 2 - Extract from the draft LCDP Dromod zoning map with approx. site boundaries in Black

- New Residential
- Open Space & Amenity
- Enterprise & Employment
- Constrained Land Use
- Existing Residential
- Social & Community
- Town/Village Centre

In the draft Leitrim County Development Plan 2023-2029 (LCDP) the site is subject to four zoning categories. These zoning categories and their respective objectives are detailed in Table 6.1 of the draft LCDP, and are listed below:

Zoning	Objective
<i>New Residential</i>	<i>To provide primarily for new residential development and community services at appropriate densities for the positioning of the centre in the Settlement Hierarchy and with an emphasis on quality of design.</i>
<i>Open Space and Amenity</i>	<i>To preserve, provide for and improve active and passive recreational public and private open space.</i>
<i>Enterprise and Employment</i>	<i>To provide for enterprise and employment creation.</i>
<i>Constrained Land Use</i>	<i>To ensure the appropriate management and sustainable use of flood risk areas designated as ‘Constrained Land Use’ on Settlement Plans.</i>

Our client requests that the portion of the lands zoned 'Open Space' are re-zoned to 'New Residential'. For ease of legibility, the below map (Figure 3) shows the Open Space subject lands marked as Lands A and B, with the Enterprise and Employment lands marked as Lands C. The lands will be referred to by these letters for the rest of this submission document.

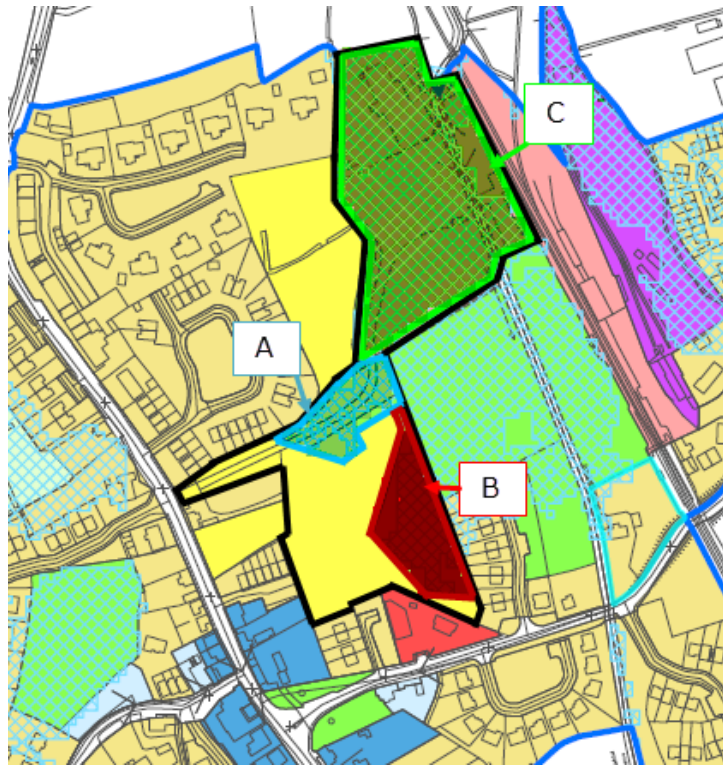


Figure 3 – Submission lands outlined in blue, red and green respectively

2.1 Settlement Hierarchy

Dromod is designated a Tier 3 'Key Village' in the draft LCDP. Key villages are defined as 'Large villages with local service functions, specialized employment in some centres and which play an important role in supporting the social, economic and cultural life within rural communities.'

CS OBJ 13: To ensure that the Key Villages accommodate commensurate population and employment growth to accommodate natural increase and maintain existing services, and to ensure that future growth is balanced and sustainable.

CS OBJ 14: Ensure that the range of Villages across the county maintain their existing population levels and services, cater for modest levels of growth appropriate to their scale, size and character.

CS OBJ 13 and 14 deal with accommodating future levels of population growth within Key Villages. The population of Dromod has shown a steady rise in recent years, almost trebling between 2006-2016, going from 210no. persons in 2006, to 356no. persons in 2011, to 555no. persons in 2016, as stated on page 91 of Volume II of the draft LCDP.

This rise in population shows an existing and increasing interest in living in the village of Dromod, and therefore it is submitted that there be an increase in the amount of land zoned New Residential to meet this evident demand for housing. In order to do this in a compact and sustainable manner, the proposed re-zoning of Lands A and B is considered appropriate.

The guidance provided alongside the zoning 'Open Space and Amenity' in Table 6.2 of the draft LCDP states that "high standards of accessibility are essential". Considering the current placement of the Open Space zoning on Lands A and B, it could be said that it is not particularly accessible where it is located. Proposed residential developments require an appropriate amount of open space to be included in their landscaping and design. Removing the static Open Space zoning on Lands A and B would allow more flexibility when it comes to the design and layout of a potential residential development, therefore providing the opportunity to make the open space more accessible overall. Open space would still be provided even if the lands are zoned for residential

It is therefore deemed appropriate to request that the Open Space zoning in the draft LCDP for Lands A and B be changed to New Residential in order to accommodate this potential future population growth in a compact and sustainable manner.

Area A also provides access to the lands to the north and in that context it is considered more appropriate to have a residential zoning than an open space zoning as in the latter case infrastructure might not be a permitted use.

2.2 Flood Risk Assessments

The draft LCDP includes the below policy in the settlement plan for Dromod village:

DD 7: Ensure applications for development on lands identified as flood risk areas, shall be subject to a Specific Flood Risk Assessment and Justification Test, in accordance with the Planning System and Flood Risk Management – Guidelines for Planning Authorities (2009), or any superseding guidelines and circulars.

It is acknowledged that the Open Space zoning on the lands is in response to the identified flood risk in the area. However, it is submitted that changing the zoning of Lands A and B from Open Space to New Residential would be appropriate in light of the above policy DD 7, which states that any applications for developments on lands identified as flood risk areas in Dromod shall be subject to a Specific Flood Risk Assessment and Justification Test. A site-specific Flood Risk Assessment (FRA) would allow for greater accuracy regarding possible development on the lands, and therefore the proposed zoning change is considered a suitable request, as it would increase the potential for housing stock in the built-up footprint of Dromod.

3.0 NATIONAL PLANNING FRAMEWORK 2040 (2018)

The National Planning Framework (NPF) encourages compact growth within the country. The NPF contains ten National Strategic Outcomes (NSOs) that the NPF aims to deliver via effective policies, actions and investments. The first of these NSOs focuses on compact growth and acknowledges the need to deliver a greater proportion of residential development within the existing built-up footprint of cities, towns and villages through the encouragement of infill development and regeneration and revitalisation of urban areas (pg. 139).

The NPF aims to provide a large amount of future housing development within and close to the existing 'footprint' of built-up areas.

NPO 3a: *Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements.*

NPO 3c: *Deliver at least 30% of all new home that are targeted in settlements other than the five Cities and their suburbs, within their existing built-up footprints.*

The NPF mentions the importance of maintaining the distinctiveness of settlements and rural areas (pg. 34).

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

NPO 18a: *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.*

NPO 33: *Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.*

The subject lands at Dromod would be capable of supporting sustainable development and growth in the village, as encouraged by NPOs 15 and 18a. A future residential development would increase the critical mass of the village, provide access to the local services in the village centre and bring more demand for public transport, especially in relation to the Dublin-Sligo railway line, which has the only operational train station in Co. Leitrim.

The re-zoning of the subject lands would also be in compliance with NPO 33, as a residential development on the lands would be sustainable not only in terms of compact growth but in terms of the available use of public transport. Our client's lands are a walkable distance from Dromod village centre, are close to the aforementioned train station that serves the Dublin-Sligo railway line, and are served by the 564 bus which runs between Carrick-on-Shannon and Ballinamore and the 23 Expressway bus which runs between Dublin and Sligo.

4.0 REGIONAL SPATIAL AND ECONOMIC STRATEGY FOR THE NORTHERN AND WESTERN REGION

County Leitrim is part of the Northern & Western Regional Assembly Area, and is therefore covered by the Regional Spatial and Economic Strategy (RSES) for the Northern & Western Region.

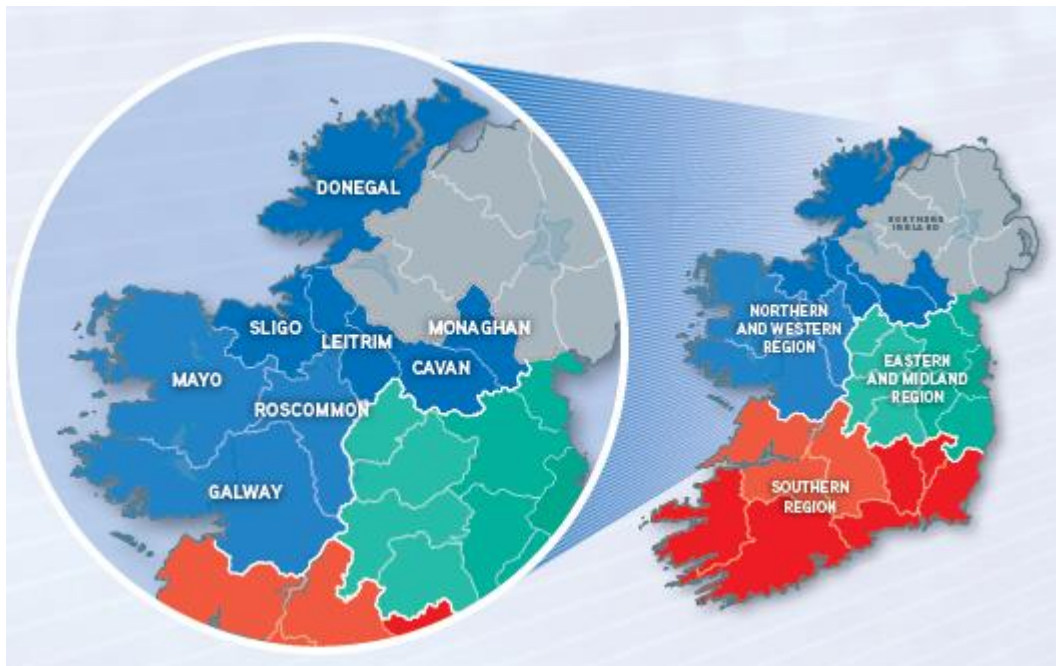


Figure 4 - Extract from the RSES for the Northern & Western Region (pg. 2)

The RSES contains 'Five Growth Ambitions' which define the priorities of the RSES. Compact growth is identified as key to sustainable development in these Growth Ambitions, as it can ensure sustainable growth of more compact urban and rural settlements, and can combat continued sprawl and unplanned growth (pg. 32).

The RSES commits to compact growth as a key form of approach to sustainable development within the Region. It acknowledges that the future role and function of small towns and villages across the Region needs to be re-imagined, addressing various types of decline, and that these forms of decline can be significantly influenced through the delivery of new housing, which is identified as an important opportunity for the re-imagining of smaller towns and villages, and references the NPF's target of 40% of all new homes to be within the existing built-up footprints of cities, towns and villages. The RSES states that in all cases the approach should provide a range of attractive housing choices as an alternative to living in one-off houses outside towns and villages (pg. 45).

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

The lack of land zoned 'New Residential' in Dromod is not in keeping with the regional and national push towards compact growth and sustainable development. It could also be a future hindrance to the re-imagining of Dromod village, as the RSES identifies the delivery of new housing as being paramount to the re-imagining of smaller towns and villages. More housing and a resultant higher population would lead to more footfall in the village centre and more use of public transport.

As stated on pg. 14 of the RSES, Leitrim has the highest majority population in the Northern and Western Region living in rural areas, at 89%. The RSES aims to combat the requirement for one-off rural housing by providing attractive housing choices within settlement boundaries as an alternative. Zoning more land in Dromod for new housing could contribute to the provision of alternative housing in the settlement boundary of a village and therefore adhere to the policies for compact growth.

5.0 SUBMISSION REQUEST

For ease of legibility, the map first shown as Figure 3 in Section 2.1 of this submission document is repeated below:

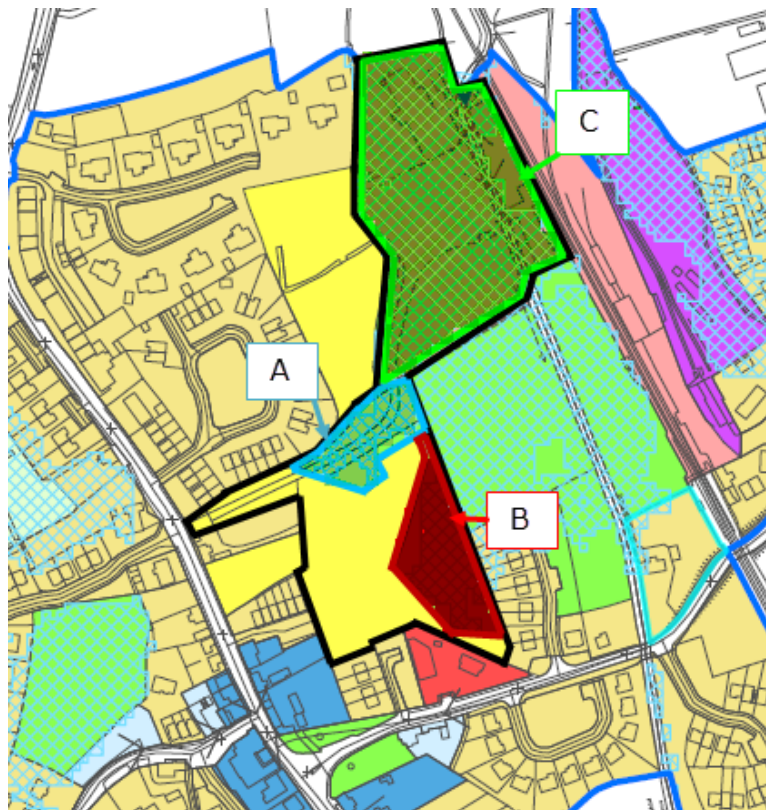


Figure 5 - Submission Lands outlined in blue, red and green respectively

5.1 Lands A and B

In light of the context provided and the scarcity of sufficiently zoned residential land in Dromod, this submission seeks that the open space in the southern portion of the lands (identified as Lands A and B) be re-zoned to 'New Residential'.

It could be said that the amount of land in Dromod zoned 'New Residential' is not a sufficient amount in regard to the policy goals of the NPF and the RSES, which aim for 40% of all new future housing to be within the built-up footprint of cities, towns and villages. As seen on the Dromod Land Use Zoning Objectives Map, there is a much larger amount of land zoned as Open Space in comparison to that zoned New Residential, which is in conflicts with the aforementioned policies in the NPF and RSES in regards to compact growth and sustainable development.

To emphasize the disparity between the amount of land zoned 'New Residential' and the amount of land zoned Open Space, see the below Figure 6:



Figure 6 - Lands zoned 'Open Space' marked in black on the left, Lands zoned 'New Residential' marked in black on the right

Guidance provided with the zoning 'Constrained Land Use' in table 6.2 of the draft LCDP states that any development proposals within areas zoned as such shall be accompanied by a detailed FRA, and that proposals shall only be considered favourable where it is demonstrated they would not have adverse impacts or impede access to a watercourse or floodplain or increase the risk of flooding to other locations. Considering this, and considering the fact that site-specific and therefore more accurate FRAs can be carried out in relation to proposed developments on lands with potential flood risk, it is considered unnecessary to zone all flood-risk lands as Open Space. Zoning all flood-risk lands as Open Space directly conflicts with the national and regional policies of compact growth within settlement boundaries, especially when a portion of these lands could turn out to be suitable for development once a site-specific FRA is carried out.

As previously mentioned, Leitrim has the highest majority population in the Region living in rural areas. Providing suitable alternatives to housing in the open countryside would encourage more growth within the built-up footprint of Dromod village, which is a key objective for future development in both the NPF and the RSES and therefore should be encouraged and supported by the Leitrim County Development Plan 2023-2029. This could be achieved by zoning more land within the village of Dromod as New Residential, and reducing the amount of static Open Space zoning.

Re-zoning Lands A as residential would also allow for the appropriate development of an access road to Lands C, zoned 'Enterprise and Employment'. Under the guidance for lands zoned 'Enterprise and Employment' in Table 6.2 of the draft LCDP, it is required that good road access is provided for the lands. Keeping these lands zoned as 'Open Space' could hinder the development of a suitable access road to Lands C.

5.2 Lands C

Our client supports the zoning of the lands marked in Lands C as 'Enterprise and Employment' and the policy DD 6 in the draft LCDP.

DD 6: *Seek the redevelopment of the former ABP beef processing plant in Dromod and adjoining lands for enterprise and employment uses.*

However, it is requested that the guidance for this zoning type be expanded to include *sui generis* uses as a high degree of flexibility is appropriate for a site such as this. Indeed, it might be worthwhile to place a special or specific objective on these lands seeking the provision of a masterplan for employment and/or mixed use development.

6.0 CONCLUSION

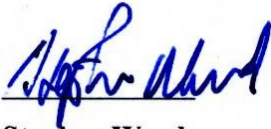
It is submitted rezoning of Lands A and B from Open Space to New Residential is in compliance with national and regional policies that prioritise compact growth as a means of sustainable development. It is submitted that the amount of land zoned New Residential in Dromod in the draft LCDP is insufficient in helping to achieve the NPF goal of 40% of new housing to be provided within the built-up footprints of settlements and at least 30% to be targeted in settlements other than the five cities and their suburbs.

Re-zoning Lands A from Open Space would also make it easier to provide an access road to Lands C, which are zoned Enterprise and Employment in the draft LCDP, and which have a requirement in their guidance to have appropriate access roads. Lands A and C are under the ownership of Yack Unlimited Company, which would ease the provision of an access road to Lands C in the future.

Regarding Lands C, it is requested that the guidance for this zoning type be expanded to include *sui generis* uses as a high degree of flexibility is appropriate for a site such as this. Indeed, it might be worthwhile to place a special or specific objective on these lands seeking the provision of a masterplan for employment and/or mixed use development.

The re-zoning requested is considered in compliance with the National Planning Framework 2040 and the Regional Spatial & Economic Strategy for the Northern & Western Region.

Yours sincerely,



Stephen Ward