

CSR Ref: 22107/CC/230322

CUNNANE STRATTON REYNOLDS

Planning Department
Áras an Chontae,
Carrick-on-Shannon,
County Leitrim.

27th April 2022

Online Submission

Dear Sir / Madam,

1.0 Introduction

We make this submission on behalf of Sammon Developments Limited of Killaneen, Ballinamore, Co Leitrim, N41 YK50 on the Leitrim Draft County Development Plan 2023 - 2029 for land at Park Road, Ballinamore, Kildorrugh and Knockanroe townland which is unzoned in the Ballinamore zoning map contained within the emerging County Plan. This site has been zoned over several previously adopted County Plans as Enterprise and Employment development and we request on behalf of our client that this former zoning be reinstated.

We request that the County Council consider rezoning the eastern side of the subject site as Enterprise and Employment uses in the emerging County Plan. The extent of the zoning requested is outlined in red below.

This would:

- Facilitate development on those parts of the site that do not flood in the 1:100 year present day fluvial event and where development can be accommodated.
- Allow for prospective development of a strategically located site which lies on a key transport corridor to Enniskillen and the rest of Northern Ireland beyond.
- Allow a transition of uses through the site mirroring the opportunities presented through retained zoning on the other side of the main road from the established town centre to the rural environs.
- Maximise development opportunities for employment and enterprise in the town which would greatly enhance the attractiveness of the town as a place of work, a place to live and a place to do business in.
- Facilitate industry in this location which could not be sustainably located within the town centre or in close proximity to it for environmental reasons.

We submit that despite previous economic recession and the economic implications of the Covid pandemic the recovery of the local economy should be promoted and facilitated through additional zoning of employment and economic development and especially in this case the reinstatement of the former zoning.

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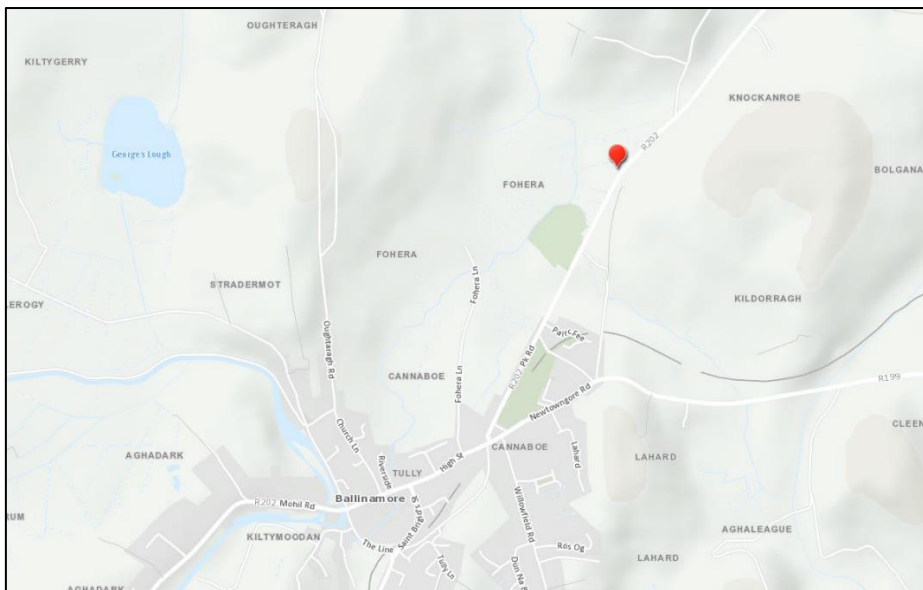
2.0 Site Location and Context

The site is located along the western side of the Regional Road R202 on the edge of Ballinamore which runs northeast runs northeast to Swanlinbar in Co Cavan and to Enniskillen beyond. The site has an irregular trapezoidal shape, extending mainly WSW-ENE, and covering approximately 3.102hectares. The site is bordered by open grassed fields used for agricultural purposes, with the exception of a road frontage in excess of 300m on the Regional Road R202 along its south-eastern border and of the Faragh River, which flows along the western boundary of the site. This request for a reinstated but reduced zoning seeks to maximise the potential of this extensive road frontage and to ensure that there is no impact on the river to the rear.

The site is separated from the neighbouring fields mainly by wooden poles and wire fence. Along the Regional Road R202 there are also sections of a stone wall, and a couple of access gates.

The site is currently subject to a planning application (Reg Ref 22/39) for the provision of a 367sqm industrial unit, provision of car parking spaces, provision of site access and turning area, provision of finished floor levels to 59.1m Ordnance Datum, connection to town sewerage and water systems and associated site works, at Kildorragh and Knockanroe, Ballinamore, Co. Leitrim.

Figure 1 Site Location

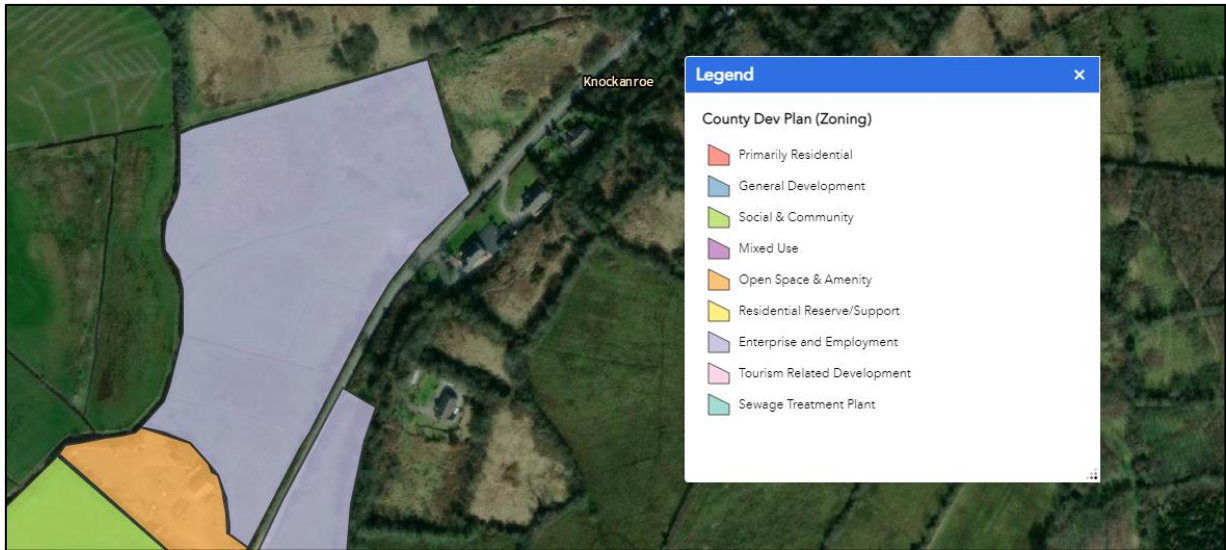


3.0 Planning Policy

3.1 Leitrim County Development Plan 2015

As per the adopted Leitrim County Development Plan 2015, the site is zoned Enterprise and Employment which aims to direct and cluster the heavier traffic generating activities, associated with enterprise, towards the edge of the town, with good access where possible and to avoid conflicts with other land uses, particularly residential. This requirement of the adopted plan is carried forward in the emerging County Plan and the above rationale for zoning in the first place as per the 2015 remains the same today in the context of the emerging plan.

Figure 2: 2015 Adopted County Development Plan Zoning Map



With relation to Enterprise and Employment zonings, the adopted County Development Plan states:

'One of the most common conflicts between neighbouring land uses is traffic generation. In general, the strategy has been designed to cluster the heavier traffic generating activities, associated with enterprise, towards the edge of the centre, with good access where possible onto the Regional/National Road network and ensuring minimal impact on residential areas. Other common conflicts between land uses that may arise; include visual, noise, odour, and light pollution.

Employment generating development likely to lead to such nuisances will be directed to the area zoned 'Enterprise and Employment'. Developments including retail warehouses, be-spoke office development, to which the public will not normally have access will be open for consideration within these areas. Other employment generating development that is not likely to create a significant nuisance may be acceptable in the areas zoned 'Mixed Use' and 'Primarily Residential'. (Bold is our emphasis)

Chapter 5, Section 5.4.1, Industrial/Commercial Developments set out the standards required for development.

5.4.1 Industrial/Commercial Development

Industrial/Commercial development should generally be located in or adjacent to settlements where infrastructure has been provided and in line with the principle of sustainable development. In assessing an application for development, the Planning Authority will weigh the development against the criteria for sustainable development (including social and economic factors) and its impact on the environment.

In individual area plans, land will be identified for employment purposes. Land will be safeguarded for the establishment of quality sites for high technology, manufacturing, research and development and/or prestige offices and must include: -

- 1) *extensive tree planting, high-quality landscaping and berming;*
- 2) *development of the highest quality in terms of design and materials;*

- 3) *less than 50% of each individual site area devoted to operational and built requirements.*

The policy regarding Industrial/Commercial Developments further states:

Areas zoned specifically for enterprise and employment use will be protected from development of any other nature. All proposed uses should be compatible with existing established uses. Car parking commensurate with usage will be required to be provided, in accordance with Table 24. All car-parking areas to serve employees and visitors shall be provided within the curtilage of the site and to the rear of established building lines, where they exist.

Having commissioned and submitted a flood risk assessment we are convinced that at least some of the previous Enterprise and Employment zoning should be reinstated.

In terms of location it should be pointed out that with a reduced zoning request the subject site is not contiguous to the River Faragh and there are now proposed to be no pathways whatsoever between the reduced rezoning requested and that river and potentially any Natura 2000 sites beyond.

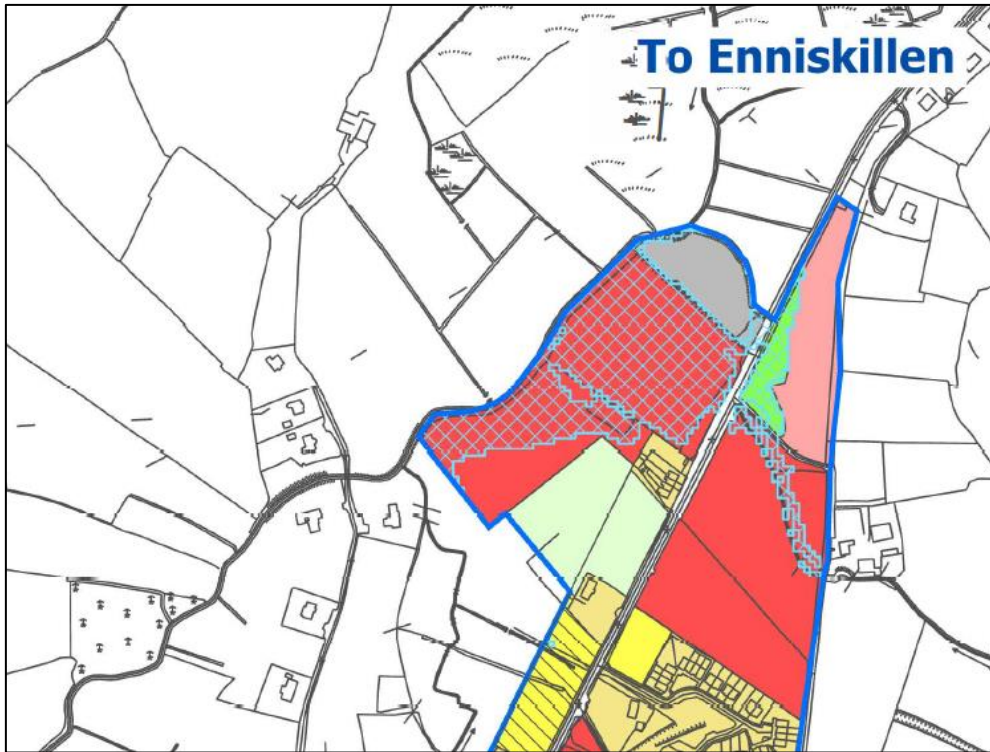
3.2 Draft Leitrim County Development Plan 2023

As per the draft Development plan, Ballinamore is designated as a Tier 2A Sub Regional Growth Centre within the Leitrim County Settlement Hierarchy, with its function recognised as a 'self-sustaining' town with a moderate level of population, served by good transport links and playing an important role in supporting the social, economic and cultural life within its surrounding area and wider network of rural communities. To avail of these attributes the town should maximise opportunities for employment and enterprise.

The County Settlement Hierarchy also recognises that Ballinamore has the capacity for continued growth commensurate with its role and function. This designation, and associated function, reflects the longstanding role Ballinamore fulfils within the county and wider region in providing for a strong level of services, housing provision and employment generating uses to cater for existing and prospective residents and its wider hinterland with significant potential to continue to develop in the future.

As per the draft plan the site has been dezoned for development as depicted below in Figure 2.

Figure 2: 2023 Draft County Development Plan



We request the appropriate zoning for industrial development be reinstated given the site's location on the primary route to Enniskillen and the strategic location of Ballinamore with regards the surrounding centres and counties.

The Economic Strategy set out in the emerging County Development Plan seeks:

- 1) To facilitate the economic development of Leitrim by putting in place the conditions whereby a viable and favourable environment for business and enterprise can flourish whilst delivering sustainable jobs, employment opportunity and an enriched standard of living for our residents.
- 2) To promote and assist in Leitrim's economic development and encourage increased resilience in the county's enterprise, underpinned by talent and innovation, thereby ensuring that Leitrim is best placed to excel in the long-term delivery of sustainable jobs and an enhanced standard of living.

If these objectives in the emerging County Plan are to be delivered upon we would request that the subject site's previous zoning be reinstated. To support our case in general economic terms the following are the key findings from an analysis of the 2016 Census of Population POWSCAR data for Co. Leitrim:

- There was a 461 reduction in number of persons employed in Co. Leitrim 2011-2016;
- There was a 565 decline in the number of persons at work in the information and communication, financial, real estate, professional, administration and support service activities sector between 2011-2016;
- There was a 340 person decline in the number employed in the county's principal town, Carrick-on-Shannon
- There was a 0.24 jobs to population ratio in 2016, down from 0.25 in 2011 (0.41 State 2016). Ideally more jobs should be provided, reflected in a larger ration to ensure that the town is more sustainable and so that the town does not become a commuting town.
- There was a 44% outbound commuter rate in 2016, up from 40% in 2011; and,
- There were 301 outbound commuters to the Dublin Region in 2016.

The stated Economic Vision for Co. Leitrim is for:

“A vibrant economy making a significant contribution to the well-being, skills and aspirations of those working and living in Co. Leitrim, and the wider North West region, through the provision of sustainable employment and business opportunity in the traditional and emerging knowledge-orientated sectors”.

3.3 Northern and Western Regional Spatial and Economic Strategy 2020-2032

The Northern and Western Regional Spatial and Economic Strategy 2020-2032 (RSES) sets out aspirations for the region which are consistent with the National Planning Framework (NPF).

The maximising of employment and economic opportunities and benefits is one of the key themes of the RSES and especially for rural areas in this region as they need to be vital and vibrant areas, need to avoid over dependence on tourism, and also have to provide employment and job opportunities and need to be able to respond to economic opportunities that arise. This should at least mean a more expansive position for future employment in places like Ballinamore.

It is also stated under the heading *‘Vitality and Viability’* that *‘The fourth industrial revolution presents a significant opportunity for our region and this strategy needs to enable employers to plan for and adapt to these changes.’* This would support a more expansive approach to employment zoning.’

The RSES at page 44 under the heading *‘Realising Opportunities’* that *‘rural areas are also well placed to benefit from new market opportunities that are emerging in sectors such as the food economy, the green economy, circular economy and the bioeconomy. These have the potential for job creation and to attract people to live and work in rural areas. Within our rural areas, the small towns and villages are particularly suitable for and reliant upon SMEs, since their local labour markets are generally too small to supply large firms. These SMEs make vital contributions to the economic and social fabric of their rural communities. The development of these types of small firms will assist in reversing economic decline and achieving more inclusive and sustainable economic growth.’* The subject site would be very well placed to meet these requirements.

‘Growth Ambition 1 Economy and Employment - Vibrant Region’ states that there is evidence of thriving sectors and emerging clusters across many areas, but primarily: Tourism, MedTech and Life Sciences, Agri-Food and Agri-Engineering, Manufacturing and Engineering, Construction, Healthcare, Education and Public sector, Marine and Energy, and Creative and Cultural sector including heritage. Many of the opportunities presented in these sectors could be captured with additional employment and enterprise zonings as requested in this instance. It is stated *‘The RSES supports the further development of these and similar place-based networks.’*

Ballinamore is located outside or on the very margin of the Atlantic Corridor so therefore must make itself available for as broad a range of alternative employment opportunities as possible especially for SMEs. This is not a large site but would potentially be very attractive to small scale and start up businesses.

Whilst the success of rural tourism in County Leitrim is highlighted there are broader employment opportunities including in the agri-food sector that Ballinamore as one of its more important settlements that the emerging County Development Plan must recognise through additional employment and enterprise zoning.

3.4 National Planning Framework – Project Ireland 2040

The National Planning Framework (NPF) states the following in regard to the overall aims for this region: *‘Through such policies, by 2040, this will be a region of more than 1 million people, 180,000 more than today, with the biggest challenge it faces being the identification and implementation of actions that will build up its urban structure, diversify and strengthen its rural areas as they transition towards a more broadly based mix of economic activities sufficient to underpin long term self-sustaining local communities. This will be complemented by improved accessibility.’* It is clear from the above that there is a need for a more broadly based mix of economic activities sufficient to underpin long term economic growth and to yield self-sustaining local communities such as Ballinamore.

The NPF states on page 65 that *‘While regional and local plans should seek to anticipate and plan for jobs growth and economic development, new and unexpected opportunities for enterprise development are likely to arise for particular locational reasons, such as local resources, skills, assets, innovation or quality of life. Regional and local planning policies should be sufficiently agile to account for these possibilities, 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.’* The NPF therefore requires flexibility to capture future economic opportunities. The subject site is strategically located to meet this requirement, was previously zoned and is contiguous to existing development and zonings and would result in compact urban development for the reasons that the site was zoned in the adopted County Plan. It is certainly more accessible and more strategically located than at least one other employment zoned site.

National Policy Objectives 6 and 7 seek to strengthen and diversify rural towns to be a focus for local housing and employment growth but not all such opportunities will be sustainably available in town centres, on brownfield land etc. The remaining employment zoned sites are located where they are for a reason and so that they are located on the strategic road network and are located away from adjacent environmentally sensitive receptors.

Reinstating the zoning of this site would be consistent with National Policy Objective 15 which seeks to *‘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.’*

4.0 Planning History

A review of Leitrim County Council Online Planning Register shows there are 2no. previous applications at the site from 2000 and 2008 along with the current application under Leitrim County Council Reg. Ref. 22/39. The recent planning history is set out in Table 1 below.

Table 1: Recent Planning History

Planning Ref.	22/39
Proposal	Provision of a 367sqm industrial unit, provision of car carparking spaces, provision of site access and turning area, provision of finished floor levels to 59.1m Ordnance Datum, connection to town sewerage and water systems and associated site works
Decision	Ongoing
Decision Date	15/05/2022

Planning Ref.	0877
Proposal	Import fill to raise the level of the existing lands by 1.0m height, and all associated site works
Decision	Refused
Decision Date	12/03/2008

Planning Ref.	00877
Proposal	Erect 11 no. residential units with temporary effluent treatment plant and associated siteworks and to connect existing house to same treatment plant all at Mullagh, Dromahaire, Co Leitrim
Decision	Conditional
Decision Date	30/11/2001

5.0 Planning Assessment

Our clients' lands are de zoned from Employment and Enterprise in the Draft Leitrim County Council Development Plan. They are the only lands subject to dezoning from Employment and Enterprise. We seek the reinstatement of the lands for zoned Enterprise and Employment as currently zoned in the adopted Leitrim County Council Development Plan 2015. The precedent for zoning of the proposed lands for enterprise and employment exists in the adopted County Plan and given the strategic location of these lands. The case for reinstating the zoning is also supported by the flooding assessment undertaken by flooding specialists Langan Engineers and which is attached to this submission, and which identifies those areas of the site that do not flood in the 1:100 year present day fluvial event and those areas capable of accommodating less vulnerable development.

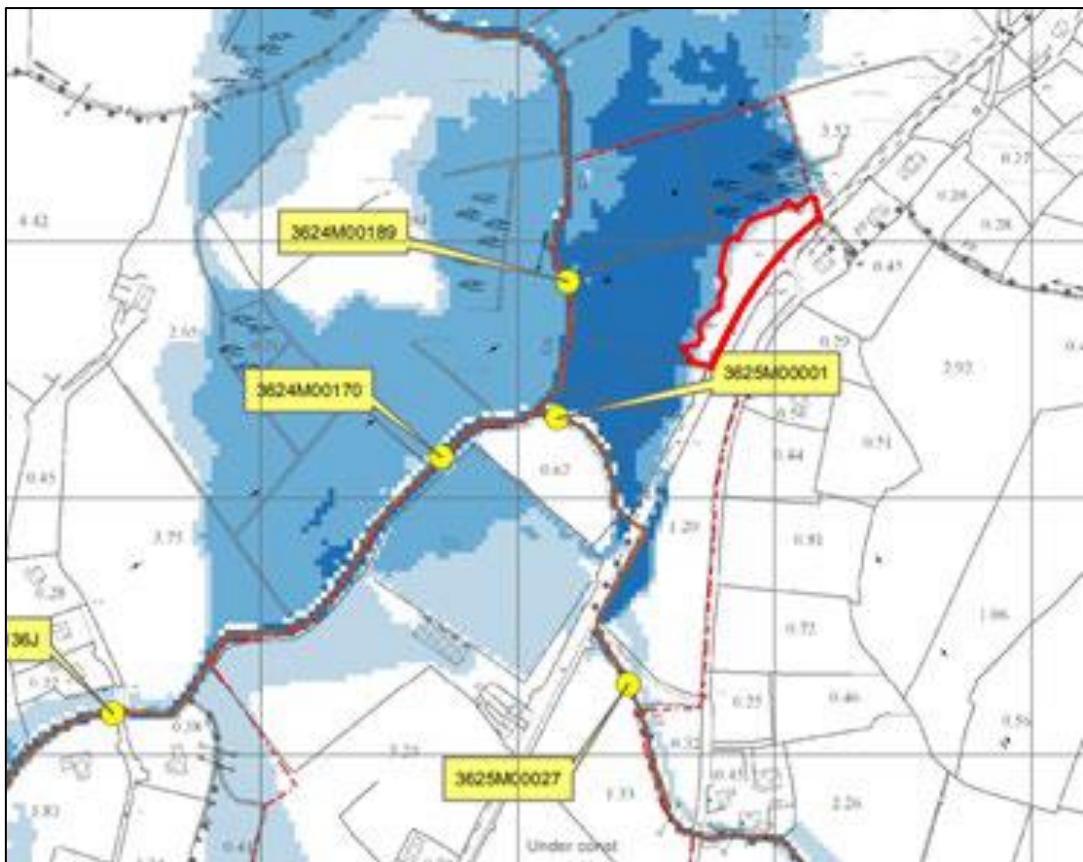
There are 5 main road arteries in and out of Ballinamore connecting it to the key employment and economic areas of Carrick-on-Shannon, Longford, Cavan, Enniskillen and Aughnasheen. The emerging County Plan identifies approximately five other areas zoned for enterprise and employment consisting of greenfield and brownfield sites. We note one of these sites is located opposite our client's site and is minimal in size and located in a similarly strategic area. That site is triangular in shape with areas to the north unsuitable for large scale appropriate

development. Our client's site is much better suited to development given the capacity of the site, strategic location and precedence set as an area designated for development and extensive road frontage and prominence. It can provide value to an emerging economic corridor linking Ballinamore with Enniskillen. The zoning of our clients' lands is in accordance with National Policy and would maximise development on this key transport corridor to Enniskillen. There is one area designated for Enterprise and employment to the east. This lies on a cul-de-sac, and it is our very strong view that that this easterly site is inappropriately zoned for employment and enterprise and further potential exists on our client's lands on a less constrained and more strategically accessible site.

We suspect that the reasoning for de-zoning our client's land is as a result of flood risk concerns. Langan Consulting Engineers (LCE) were appointed to carry out an assessment of the flood risk and to support a submission on the Draft Leitrim Development Plan and in particular in relation to the land use zoning at the subject development lands. The flooding assessment is based on the principles of the Office of Public Works (OPW) "Planning System and Flood Risk Management Guidelines" as published in November 2009 by the Department of the Environment, Heritage and Local Government.

The viability of potential zoning at this site and the associated flooding risk was assessed by LCE and an area that is confirmed as not flooding in the 1:100 year present day fluvial event is shown below. We request that this area should in red below be rezoned for employment and enterprise.

Figure 3: Area available for development outlined in Red (Source: Langan Consulting Engineers)



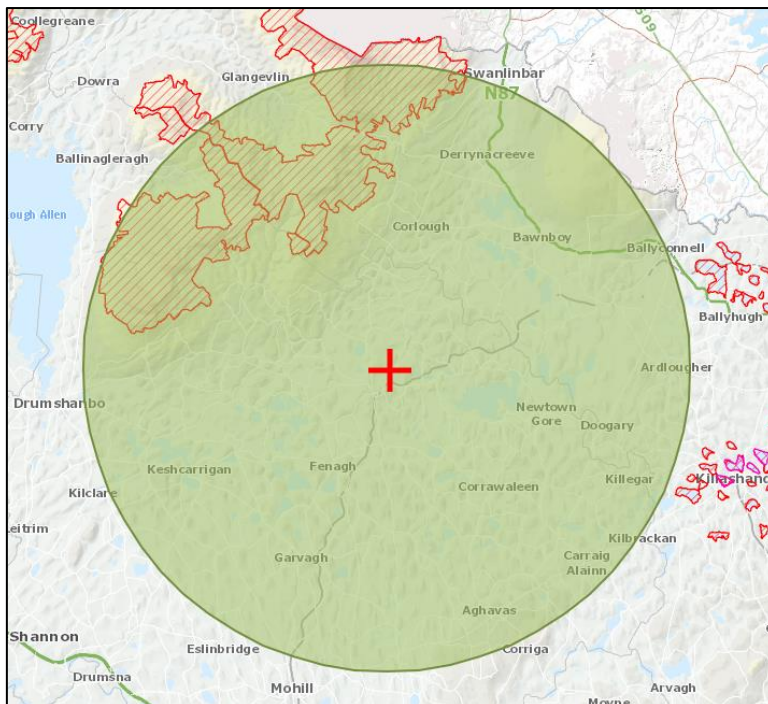
LCE concluded in their flood assessment that the main cause of flood risk at this site is from extreme fluvial flood events. Our client's lands are located in Flood Zone B and C which are identified as being suitable for development in the appropriate flooding guidelines. Accordingly, *under the OPW Planning System and Flood Risk Management Guidelines published in November 2009, developments of Commercial or Industrial nature would generally be considered appropriate in Flood Zone B and C.*

As per the OPW Planning System and Flood Risk Management Guidelines, the Enterprise and Employment zoning should be reinstated for our client's lands located fully within Flood Zone B and C and outlined in red.

The proposed reinstatement of the lands for Economic and Employment will support and help ensure the economic targets and emerging policies and objectives in the Draft Leitrim County Development Plan are achieved.

It is a requirement of the Habitats Directive (92/43/EEC) that the competent consent authority, which is either the planning authority or on planning appeal, An Bord Pleanála, must ensure that any proposal, which is likely to have a significant effect on an SAC or SPA, is authorised only to the extent that the authority is satisfied it will not adversely affect the integrity of the area and that an Appropriate Assessment of the implications of the development for the conservation status of the site is undertaken. Figure 4 below identifies the location and proximity of Natura 2000 Sites within a 15km radius of the application site.

Figure 4 Map indicating 15km radius at subject site and the Surrounding designated Natura 2000 sites. (Source – MyPlan.ie)



There is one Natura 2000 site within 15km of the subject site as follows:

- *Cuilcagh - Anierin Uplands SAC – Site Code: 000584*

Having regard to the nature and scale of the requested rezoning, the nature of the receiving environment, with the site being located some distance to the nearest European sites and no direct or indirect pathways to those designated sites, there is considered to be no impact on the designated site as surface water drainage will be away from the part of the site prone to flooding reducing potential for transmission of pollution into the river to the path to the Cuilcagh - Anierin Uplands SAC. Drainage water is managed via a new pipe entering a storm water drain with all surface water run-off from the proposed development attenuated on-site, prior to discharge to the adjacent watercourse. All site drainage will be designed in accordance with Sustainable Drainage systems (SuDS) principles. We submit that no Appropriate Assessment issues arise and it is not considered that the proposed development or zoning would be likely to have a significant effect individually or in combination with other plans or projects on any European designated site. **The proposed does not impact or impede access to any watercourse, floodplain, or flood protection facility and especially any waterway that would potentially be a pathway to Cuilcagh, Anierin Uplands SAC.**

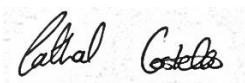
It can be objectively concluded that there is no likelihood of any significant negative effects on any Natura 2000 sites arising from the requested reinstated but reduced zoning as there are no direct or indirect linkages between the site outlined in red and Natura 2000 sites that would give rise to an impact on the conservation objectives of the Natura 2000 sites within 15 km of this site.

7.0 Conclusion

Having regard to the strategic location, the relevant planning policies, existing precedence of the sites previous zoning and the flood assessment it is considered that rezoning of the land for Enterprise and Employment is consistent with the planning and sustainable development of the area. This proposed amendment does not place any requested zoning for Enterprise and Employment zoning within the Flood Zone A extents.

I trust that you will have regard to the above in your deliberations and look forward to a positive decision in due course. If any further information is required, please do not hesitate to contact us.

Yours sincerely,



Cathal Costello

Planner

CUNNANE STRATTON REYNOLDS

LAND PLANNING & DESIGN

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CONSULTING ENGINEERS

FLOOD RISK ASSESSMENT

SUBMISSION REGARDING LCC COUNTY DEVELOPMENT PLAN 2023-2029
FOR DEVELOPMENT LANDS AT BALLINAMORE, CO. LEITRIM

SAMMON DEVELOPMENTS LTD.

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QUALITY CHECK SHEET

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PROJECT TITLE: SUBMISSION REGARDING LCC COUNTY DEVELOPMENT PLAN 2023-2029 FOR DEVELOPMENT LANDS AT BALLINAMORE, CO. LEITRIM

CLIENT: SAMMON DEVELOPMENTS LTD.

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TABLE OF CONTENTS

1	INTRODUCTION.....	3
	1.1 CONTEXT	3
	1.2 LAND-USE ZONING AMENDMENT	5
2	FLOOD RISK ASSESSMENT	6
	2.1 OPW CFRAM AND LCC DEVELOPMENT PLAN FLOOD MAPS	6
	2.2 SITE-SPECIFIC FLOOD RISK ASSESSMENT SUMMARY	7
3	CONCLUSION AND RECOMMENDATIONS.....	8
	3.1 CONCLUSION	8
	3.2 RECOMMENDATIONS.....	8
APPENDIX A :	EXISTING LEITRIM COUNTY DEVELOPMENT PLAN 2015-2021 – BALLINAMORE LAND USE ZONE MAP	10
APPENDIX B :	DRAFT LEITRIM COUNTY DEVELOPMENT PLAN 2023-2029 – BALLINAMORE LAND USE ZONE MAP	12
APPENDIX C :	STRATEGIC FLOOD RISK ASSESSMENT 2022-2028 – FLOOD ZONE MAP	14
APPENDIX D :	CURRENT OPW CFRAM FLOOD ZONE MAP (PRESENT DAY)	15
APPENDIX E :	FLOOD ZONE MAPPING FOR SITE	16

LIST OF FIGURES

Figure 1.1 Location of the proposed development landholding	3
Figure 1.2 Current Leitrim CDP Land-Use Zoning (2015-2022)	4
Figure 1.3 Extract from the draft Leitrim CDP - Proposed Land-Use Zoning (2023-2029)	4
Figure 1.4 Landowner proposed amended Land-Use Zoning.....	5
Figure 2.1 LCC County Development Plan 2023-2029 – Strategic Flood Risk Assessment Flood Zone Mapping.....	6
Figure 2.2 CFRAM Ballinamore Flood Extent Mapping July 2016 – Fluvial Present Day	7

LIST OF TABLES

Table 2.1 Summary of flood risk based on OPW CFRAM and LCC flood mapping	6
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1 INTRODUCTION

1.1 CONTEXT

Leitrim County Council (LCC) has published a draft County Development Plan 2023-2029 for public consultation. LCC has invited any interested parties to make submissions or observations regarding the draft Development Plan. CSR Ltd. is preparing a submission on behalf of Sammon Developments Ltd. for their lands at Ballinamore, Co. Leitrim. Lands applying for rezoning are outlined in red in Figure 1.1 below.



Figure 1.1 Location of the proposed development landholding

At present, the landholding is zoned as Enterprise and Employment in the current Leitrim County Development Plan (CDP) (2015-2022)¹. See Figure 1.2 below. The site for which rezoning is sought through this submission is the subject of a current planning application under Leitrim County Council Reg. Ref. 22/39 for an industrial unit, car parking, amended vehicular access to the site and associated works on that part of the site that does not flood in the 1:100 year present day event. The draft Leitrim CDP (2023-2029) proposes to de-zone the development landholding. See Figure 1.3 below.

Langan Consulting Engineers (LCE) is currently appointed to provide a flood risk assessment for the ongoing planning application. LCE has also been appointed to carry out an assessment to support a submission to amend the land use zoning at the subject development lands. This assessment is based on the principles of the Office of Public Works (OPW) “Planning System and Flood Risk Management Guidelines” as published in November 2009 by the Department of the Environment, Heritage and Local Government.².

The subject development landholding is being de-zoned in the draft Leitrim CDP (see Figure 1.3) due to an identified flood risk. However, the flood risk for less vulnerable development (i.e., commercial) does not encroach on the red landholding boundary.

¹ Current Leitrim CDP (2015-2022)

² “Planning System and Flood Risk Management Guidelines” published in November 2009 by the Department of the Environment, Heritage and Local Government, including the Technical Appendices.

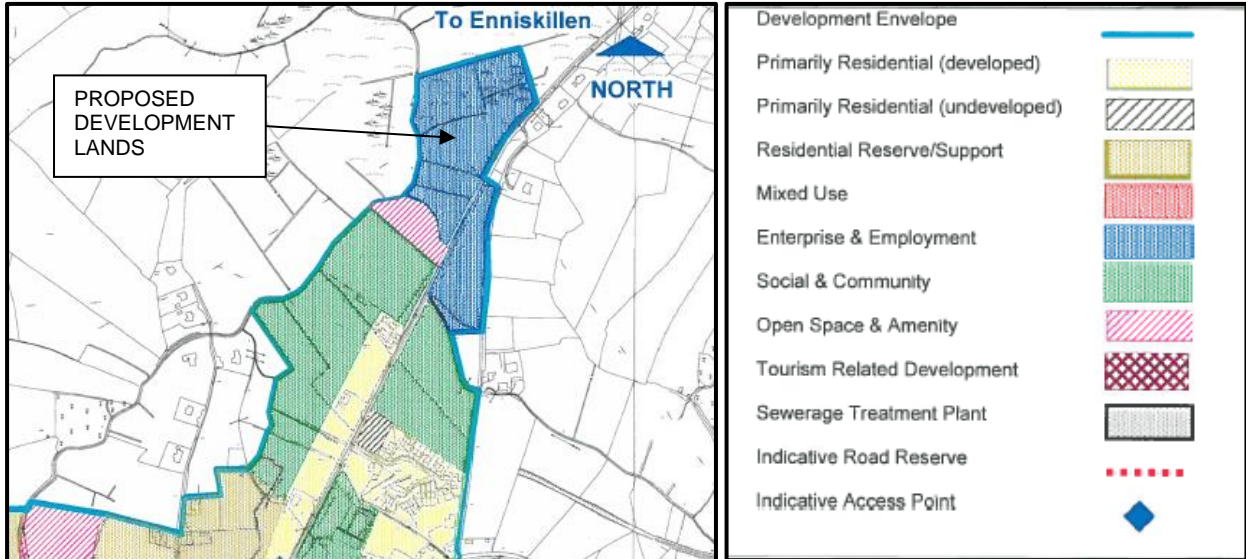


Figure 1.2 Current Leitrim CDP Land-Use Zoning (2015-2022)¹

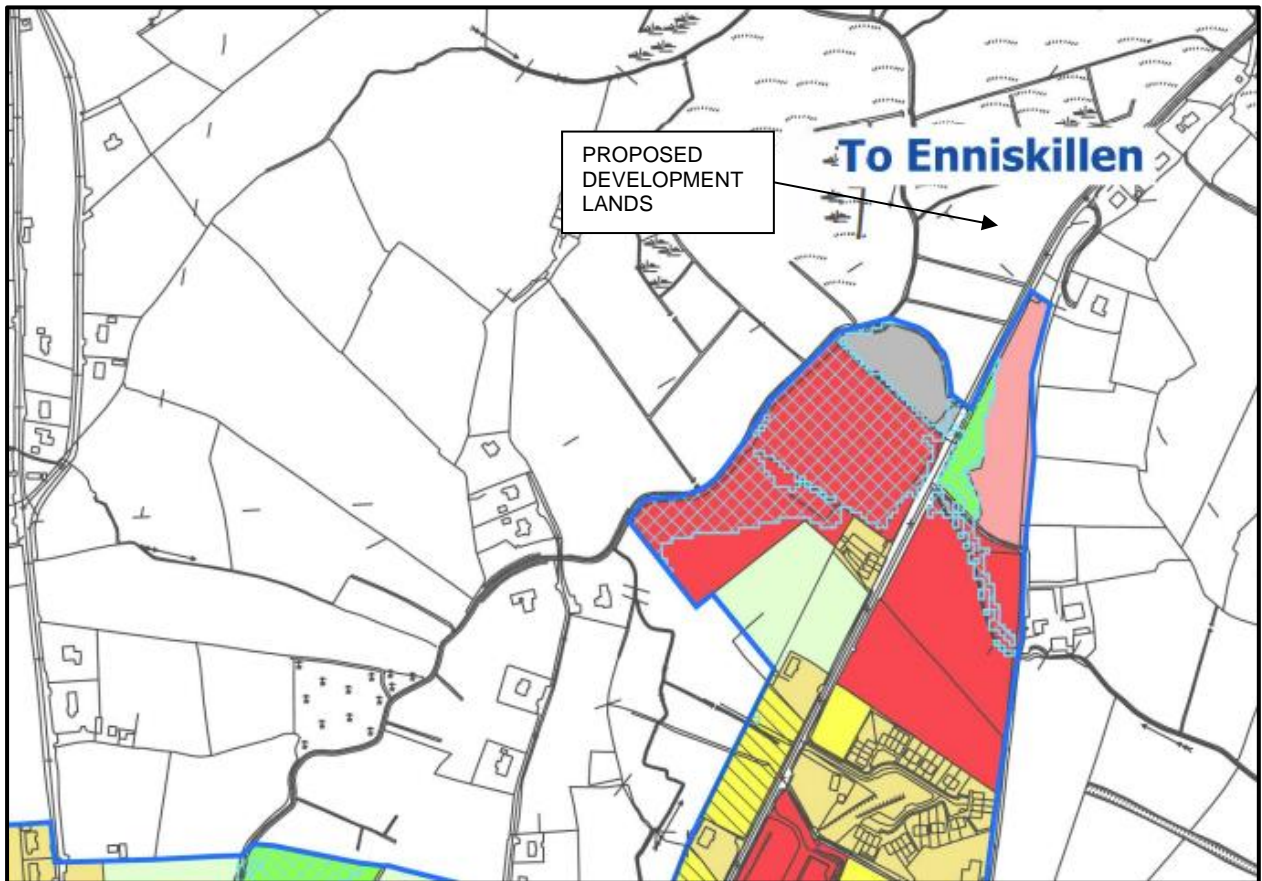


Figure 1.3 Extract from the draft Leitrim CDP - Proposed Land-Use Zoning³ (2023-2029)

³ Draft Leitrim County Development Plan 2023-2029, Ballinamore Land Use Zoning Objectives Map

1.2 LAND-USE ZONING AMENDMENT

In order to ensure the development viability of the landholding an amendment to the proposed Ballinamore CDP zoning is requested. The proposed landowner amended Enterprise and Employment boundary is outlined in red in Figure 1.4 below. This requested rezoning **does not place any proposed Enterprise and Employment lands within the Flood Zone A extents**. There is no justification on flooding grounds for not reinstating the previous enterprise and employment zoning over the lands shown in Figure 1.4 below, which avoid those lands identified as Flood Zone A where development would be inappropriate.

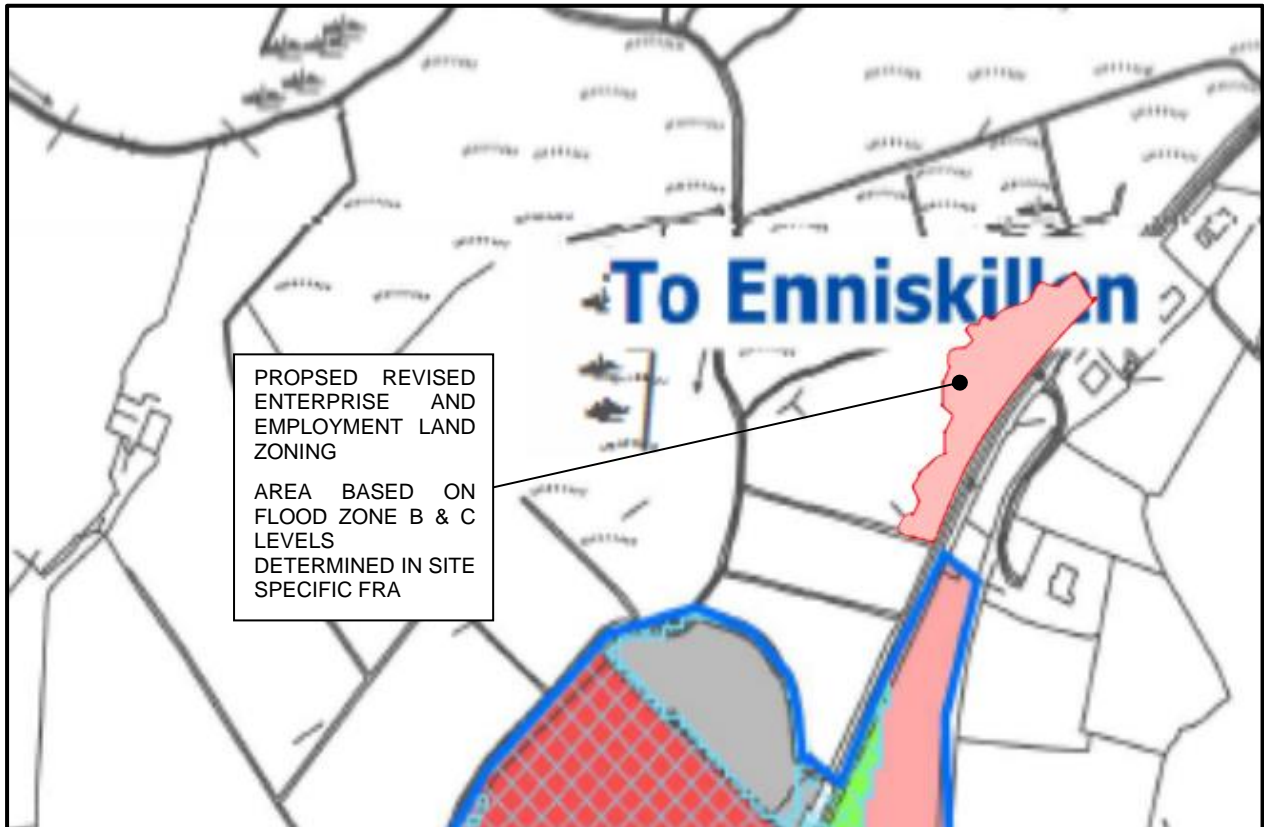


Figure 1.4 Requested Former Enterprise and Employment Zoning to be Reinstated Following Flood Risk Assessment

2 FLOOD RISK ASSESSMENT

2.1 OPW CFRAM AND LCC DEVELOPMENT PLAN FLOOD MAPS

A review of the flood risk mapping presented in the LCC County Development Plan 2023-2029, the associated Strategic Flood Risk Assessment (SFRA) and the current OPW CFRAM⁴ has been carried out. The subject landholding **is not located within the flood extents on any of these mapping data sources**. A summary of these data sources is provided in Table 2.1. The mapping, including the subject landholding, is presented in Figure 1.4, Figure 2.1, and Figure 2.2.

Table 2.1 Summary of flood risk based on OPW CFRAM and LCC flood mapping

Data Source	Flood Type	Subject Landholding noted as at Risk of 1:100 Year Flooding (i.e., Flood Zone A)?
LCC County Development Plan 2023-2029 – Strategic Flood Risk Assessment Flood Zone Mapping (Figure 2.1)	Fluvial	No
CFRAM Ballinamore Flood Extent Mapping July 2016 ⁵ (Figure 2.2)	Fluvial	No



Figure 2.1 LCC County Development Plan 2023-2029 – Strategic Flood Risk Assessment Flood Zone Mapping

⁴ Catchment Flood Risk Assessment and Management (CFRAM) programme, see www.floodinfo.ie

⁵ N36BME_EXFCD_F0_01, dated July 2016

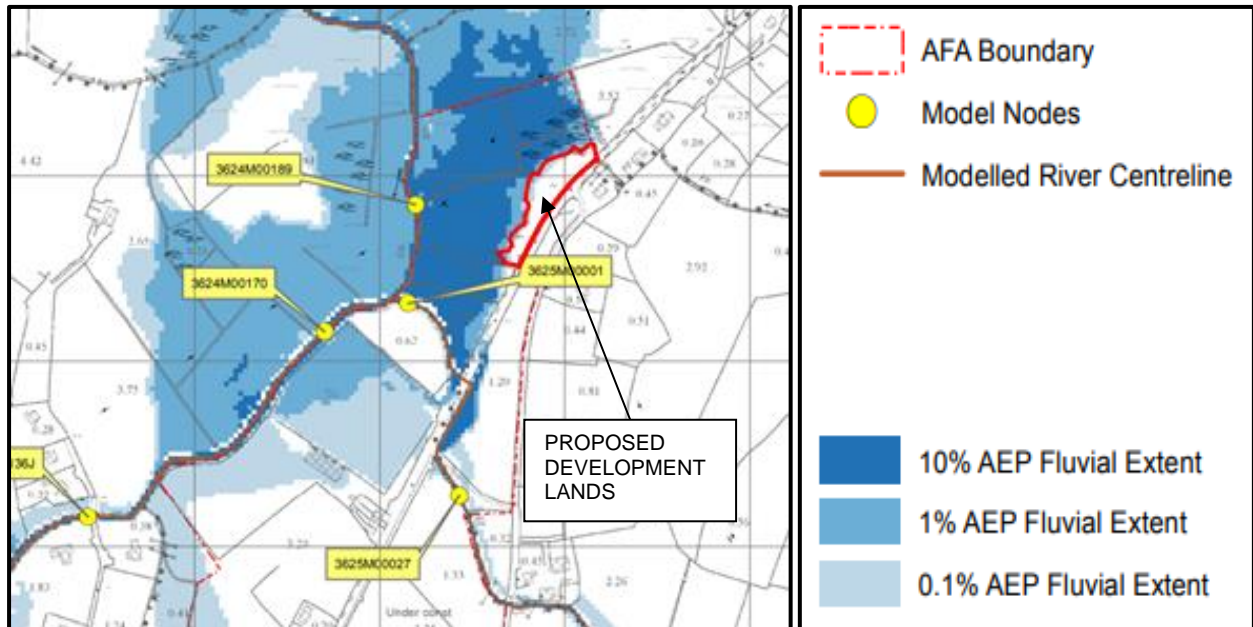


Figure 2.2 CFRAM Ballinamore Flood Extent Mapping July 2016 – Fluvial Present Day

2.2 SITE-SPECIFIC FLOOD RISK ASSESSMENT SUMMARY

A site-specific flood risk assessment has been carried out as part of the planning process. The findings of this assessment with respect to the subject landholding are summarised as follows.

The predominant flood risk in the area is from fluvial flooding. An analysis of ground levels within the proposed development lands indicates there are no low-lying areas relative to the surrounding land and watercourse.

There is no record of any significant flood history within the extents of the proposed landholding boundaries by either a statutory body or anecdotally. There is a record of localised flooding events upstream of the proposed development lands and in adjacent low-lying areas. Lands south-east of the development has been noted to flood historically by the area engineer. There are no levels recorded for this event.

Using site topographical surveys, the proposed development lands have been assessed based on the OPW "Planning System and Flood Risk Management Guidelines". A low-lying portion of the proposed development lands by the Fohera river are in Flood Zone A, while the rest of the development lands are in Flood Zone B and C. Under the OPW Planning System and Flood Risk Management Guidelines published in November 2009, less vulnerable development, such as commercial units, would generally be considered appropriate in Flood Zone B and C.

Flood map generated from site specific flood risk assessment is included in Appendix E.

3 CONCLUSION AND RECOMMENDATIONS

3.1 CONCLUSION

The primary source of flood risk in this area is from extreme fluvial flood events. The subject landholding has been reviewed based on the OPW "Planning System and Flood Risk Management Guidelines". The entirety of the lands the subject of this submission for reinstatement of the former employment and enterprise zoning is located within Flood Zone B and C which enables the former zoning to be reinstated. There is no flood-based reason for the same lands not to be rezoned. Under the OPW Planning System and Flood Risk Management Guidelines published in November 2009, less vulnerable development, such as commercial developments, would generally be considered appropriate in Flood Zone B and C.

Under the OPW Planning System and Flood Risk Management Guidelines published in November 2009, the Enterprise and Employment zoning is considered appropriate as the landholding considered is located fully within Flood Zone B and C.

3.2 RECOMMENDATIONS

An estimated design flood level for any development, including a freeboard factor to account for a margin of safety, climate change and model uncertainty should be established. All buildings and infrastructure should be designed based on the estimated flood levels.

All site surface water management design should consider the impact of any discharge on flooding elsewhere. The final stormwater system should be designed by appropriately qualified and experienced personnel and include SuDS measures.

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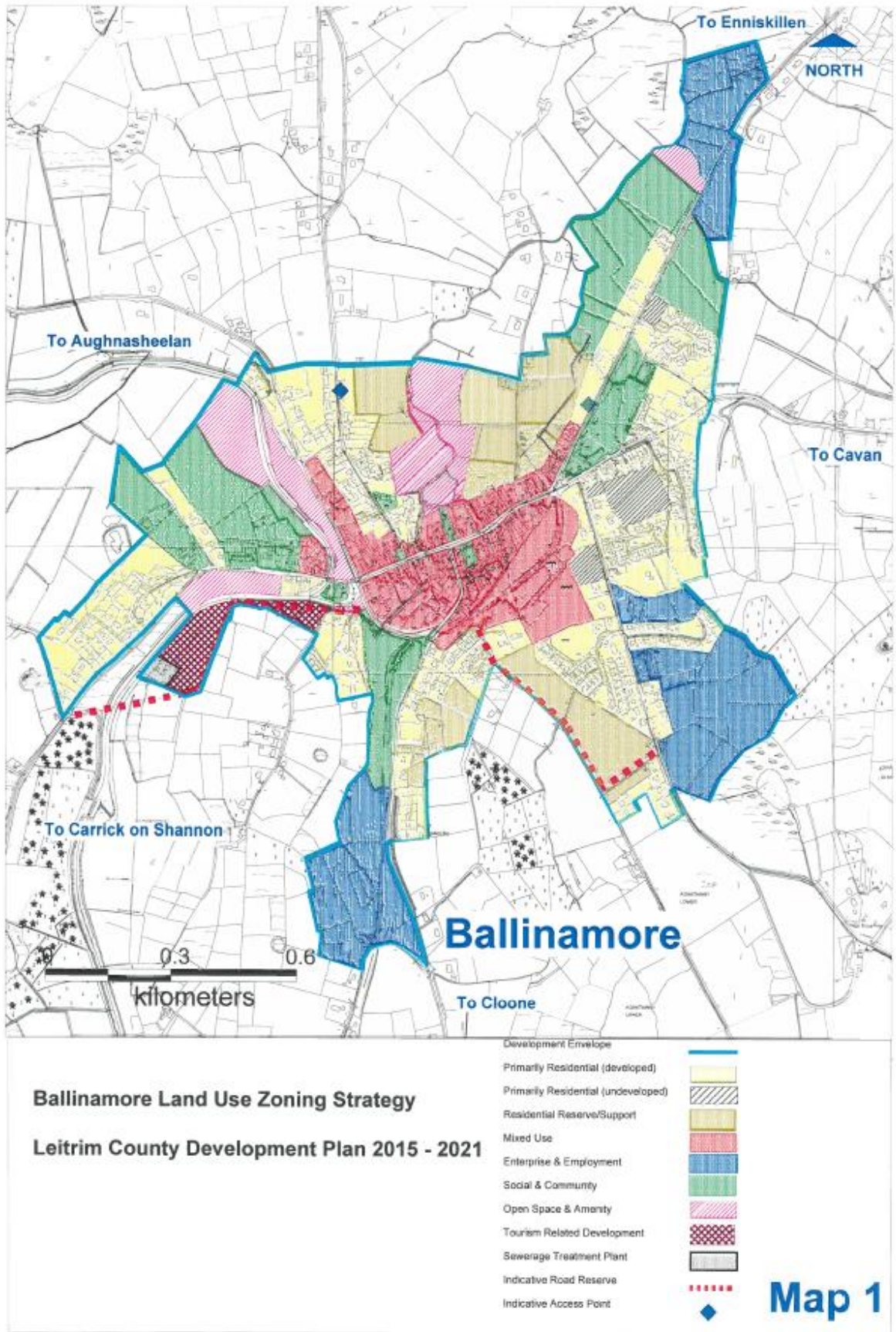
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Analysis contains inherent uncertainty. LCE recommends the application of the upper bound flood level estimate from all analysis, and the inclusion of a min. of 500mm freeboard. Selection of mid-range estimates and lesser freeboard is at the risk of the client and the planning authority. All information relating to drainage and water networks assumes ongoing maintenance of the network and removal of obstructions to flow.

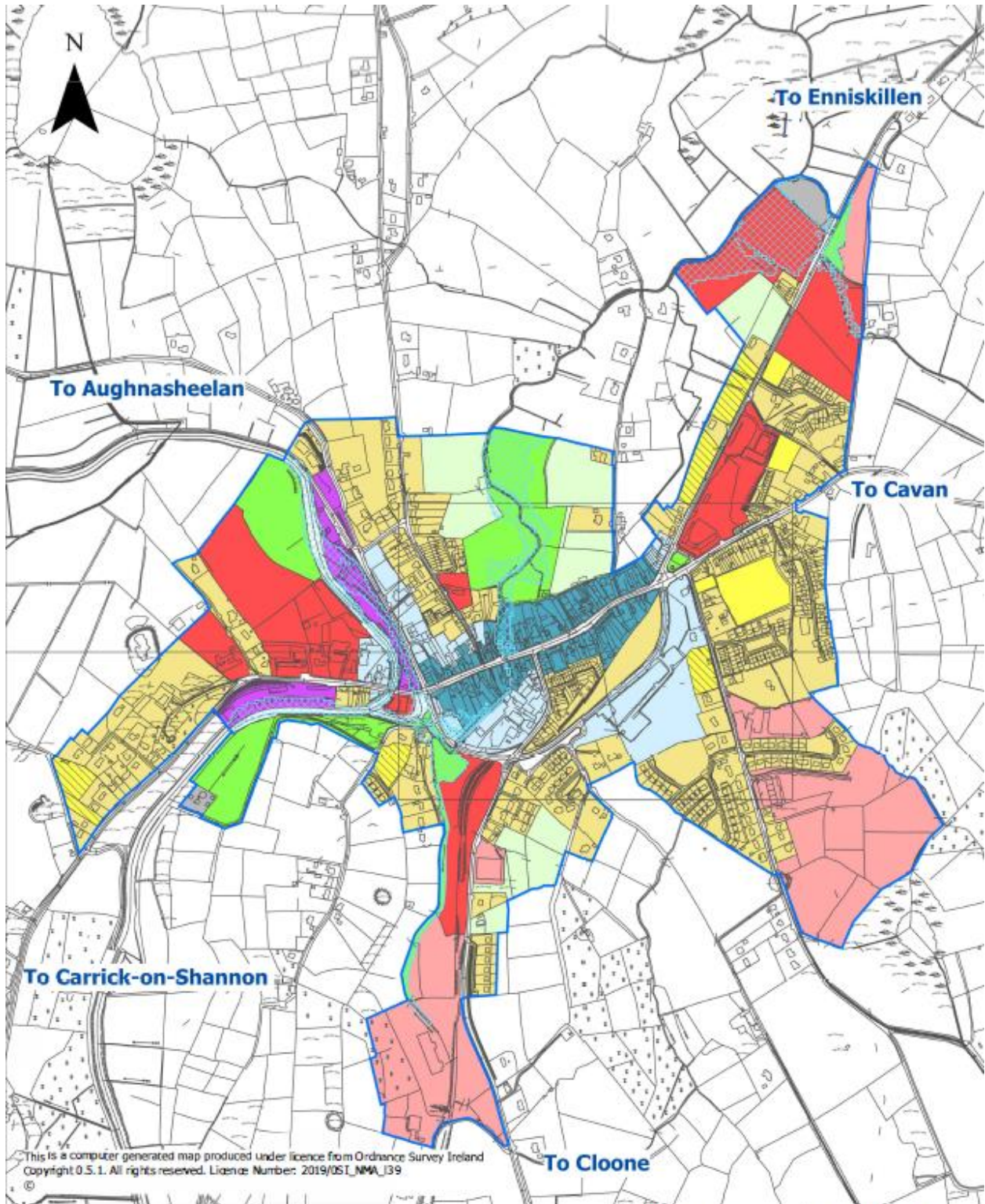
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APPENDIX A: EXISTING LEITRIM COUNTY DEVELOPMENT PLAN 2015-2021 – BALLINAMORE LAND USE ZONE MAP



APPENDIX B: DRAFT LEITRIM COUNTY DEVELOPMENT PLAN 2023-2029 – BALLINAMORE LAND USE ZONE MAP



Legend

- | | |
|-------------------------|-------------------------|
| Existing Residential | Utilities |
| New Residential | Agriculture |
| Town/Village Centre | Tourism |
| Mixed Use | Constrained Land Use |
| Enterprise & Employment | Low Density Residential |
| Social & Community | Development Envelope |
| Open Space | |

Map No. 13

Ballinamore Land Use Zoning Objectives Map

Leitrim Draft County Development Plan 2023-2029














Produced by Planning Department, Leitrim County Council, Aras an Chonae, Carrick-on-Shannon, Co. Leitrim



APPENDIX C: STRATEGIC FLOOD RISK ASSESSMENT 2022-2028 – FLOOD ZONE MAP

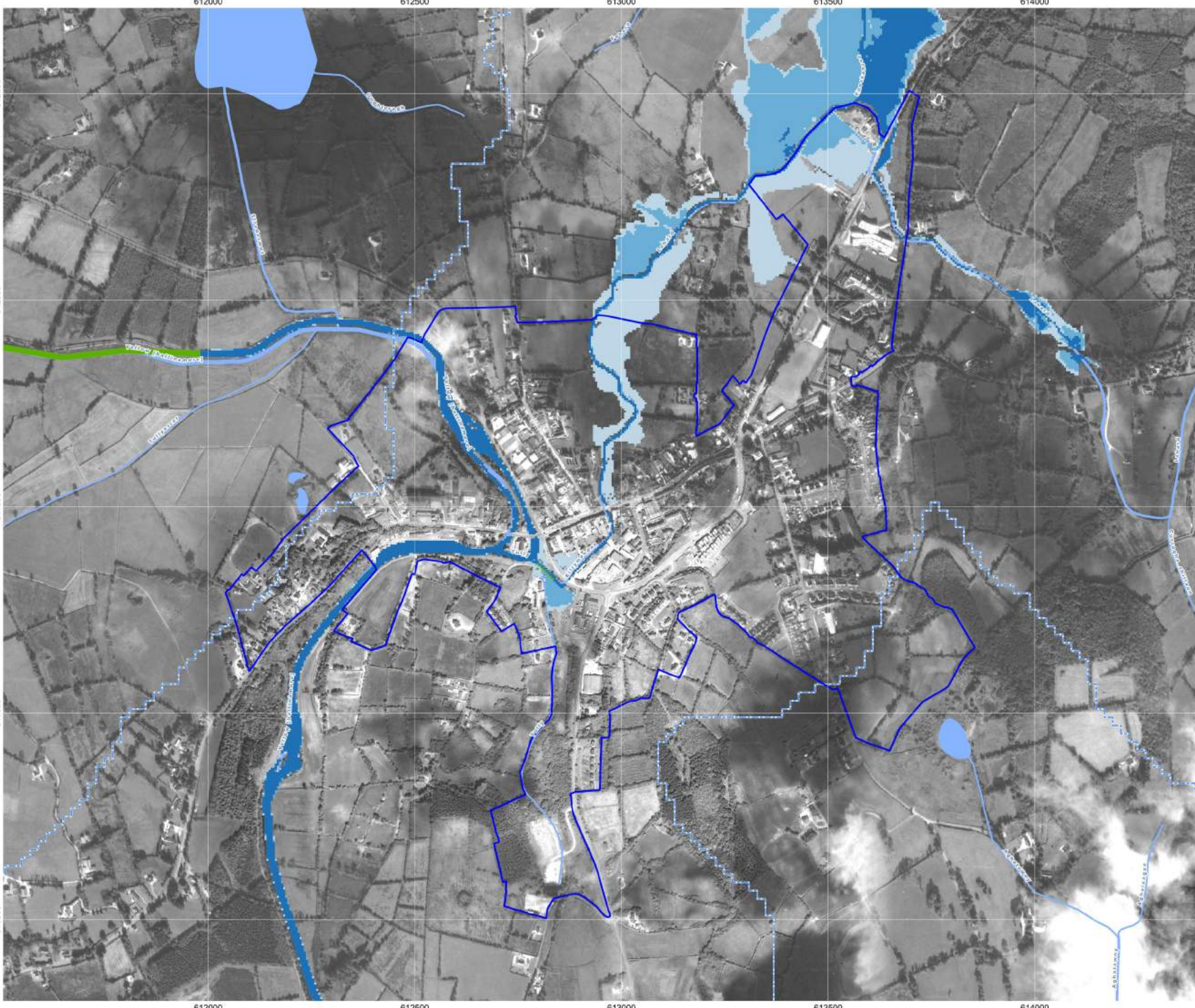
County Leitrim Development Plan 2022-2028

Ballinamore
OPW Catchment Flood
Risk Assessment &
Management (CFRAM)
& OPW National
Indicative Fluvial
Mapping (NIFM)
Present Day

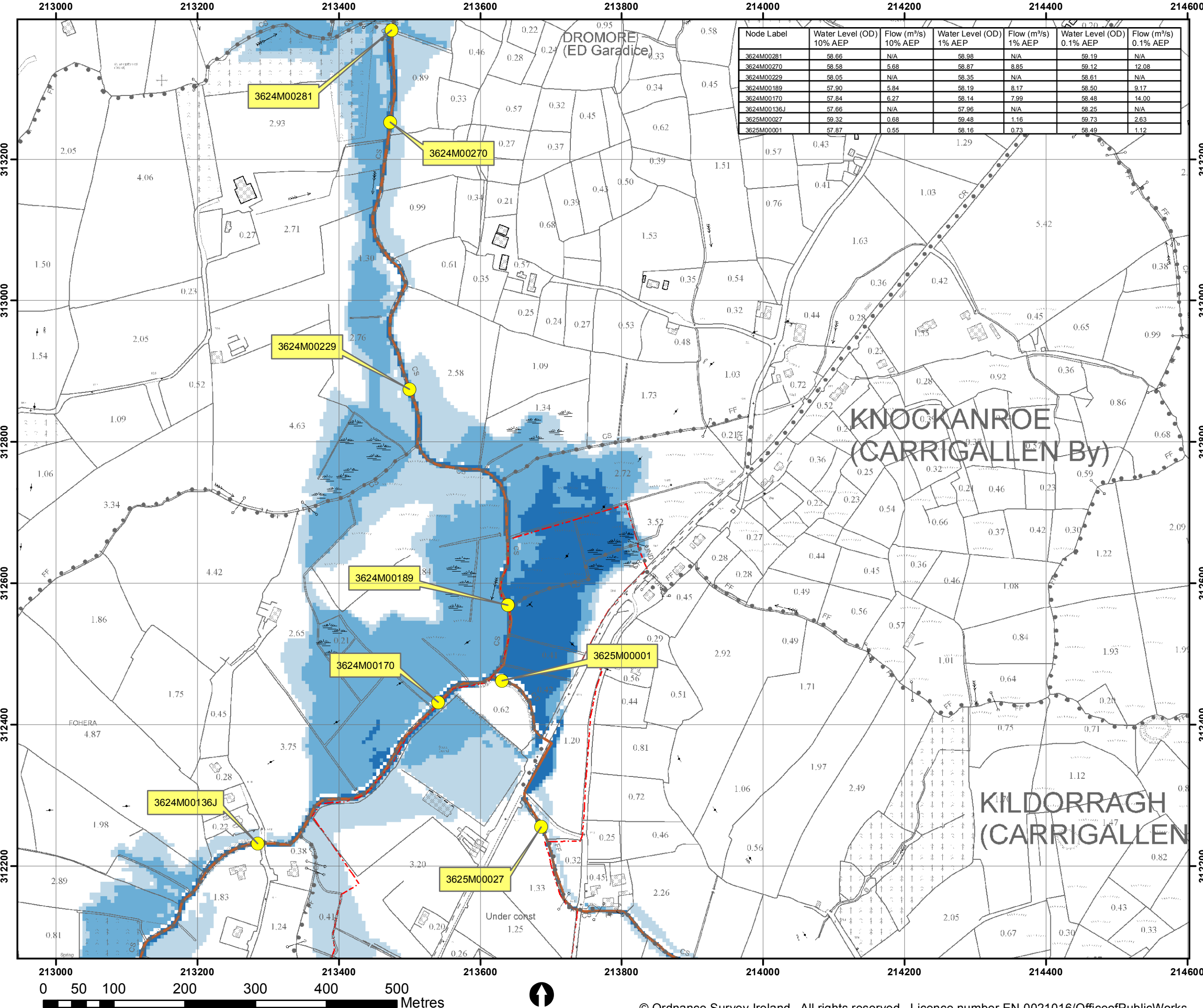
-  Plan Boundary
 -  WFD River Sub-Basins
 -  Water
 -  River or Stream
- CFRAM Present Day**
-  Fluvial 10% AEP
 -  Fluvial 1% AEP
 -  Fluvial 0.1% AEP
 -  Coastal 10% AEP
 -  Coastal 0.5% AEP
 -  Coastal 0.1% AEP
- NIFM Present Day**
-  Fluvial 5% AEP
 -  Fluvial 1% AEP
 -  Fluvial 0.1% AEP



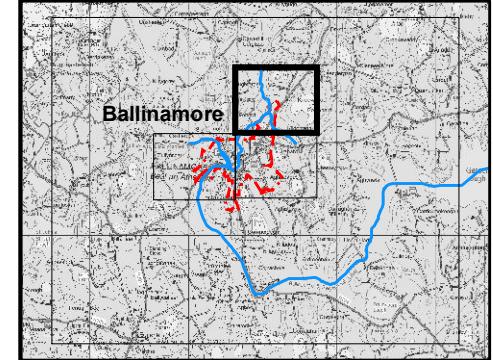
Coordinates in ITM
© Google/
© OSI & EPA (CC BY 4.0) / EU DEM/
Contains Office of Public Works information
© Office of Public Works



APPENDIX D: CURRENT OPW CFRAM FLOOD ZONE MAP (PRESENT DAY)



Node Label	Water Level (OD) 10% AEP	Flow (m³/s) 10% AEP	Water Level (OD) 1% AEP	Flow (m³/s) 1% AEP	Water Level (OD) 0.1% AEP	Flow (m³/s) 0.1% AEP
3624M00281	58.66	N/A	58.98	N/A	59.19	N/A
3624M00270	58.58	5.68	58.87	8.85	59.12	12.08
3624M00229	58.05	N/A	58.35	N/A	58.61	N/A
3624M00189	57.90	5.84	58.19	8.17	58.50	9.17
3624M00170	57.84	6.27	58.14	7.99	58.48	14.00
3624M00136J	57.66	N/A	57.96	N/A	58.25	N/A
3625M00027	59.32	0.68	59.48	1.16	59.73	2.63
3625M00001	57.87	0.55	58.16	0.73	58.49	1.12



IMPORTANT USER NOTE:
THE VIEWER OF THIS MAP SHOULD REFER TO THE DISCLAIMER, GUIDANCE NOTES AND CONDITIONS OF USE THAT ACCOMPANY THIS MAP.

- Legend**
- 10% Fluvial AEP Event
 - 1% Fluvial AEP Event
 - 0.1% Fluvial AEP Event
 - Modelled River Centreline
 - AFA Extents
 - Node Point
 - Node ID
 - Node Label

FINAL

REV:	NOTE:	DATE:
------	-------	-------



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Map: Ballinamore Fluvial Flood Extent Maps	
Map Type:	EXTENT
Source:	FLUVIAL
Map Area:	HPW
Scenario:	CURRENT
Drawn By:	F.M.C. Date: 14 July 2016
Checked By:	T.D. Date: 14 July 2016
Approved By:	S.P. Date: 14 July 2016
Drawing No.:	N36BME_EXFCD_F0_01
Map Series:	1 of 4
Drawing Scale:	1:5,000 @A3



APPENDIX E: FLOOD ZONE MAPPING FOR SITE



NOTES:

1. ALL DIMENSIONS IN METERS UNLESS OTHERWISE NOTED.
2. ALL COORDINATES ARE IN METERS AND RELATE TO ITM (IRISH TRANSVERSE MERCATOR) UNLESS OTHERWISE NOTED.
3. ALL LEVELS IN METERS ARE RELATIVE TO ORDNANCE DATUM MALIN HEAD (OSGM15).
4. DO NOT SCALE FROM DRAWINGS, USE FIGURED DIMENSIONS ONLY. ALL DIMENSIONS SHALL BE CONFIRMED ON SITE.
5. DRAWINGS ARE FOR THE PURPOSES OUTLINED IN THE TITLE BOX ONLY.
6. DRAWINGS ARE BASED ON SITE SURVEY INFORMATION AND OSI VECTOR MAPPING (2022).
7. SITE LOCATION REFERENCE X=613721 ; Y=812584 (ITM)

LEGEND

- ZONE A = < +58.2 ODM**
- ZONE B = > +58.2m TO < +58.6 ODM**
- ZONE C = > +58.6m ODM**

PRELIMINARY

THIS DRAWING TO BE READ IN CONJUNCTION WITH THE PROJECT SPECIFICATIONS AND REPORTS.

13/04/22	DR05	GC	JL	DRAFT ISSUE
15/02/22	DR04	GC	JL	DRAFT ISSUE
15/02/22	DR03	GC	JL	DRAFT ISSUE
14/02/22	DR02	GC	JL	DRAFT ISSUE
DATE	REV	BY	CHK	DESCRIPTION

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PROJECT TITLE: FLOOD RISK ASSESSMENT	DATE: FEBRUARY 2022
AT: KILDORRAGH, BALLINAMORE, CO. LEITRIM	DWG No: 2301
CLIENT: SAMMON DEVELOPMENTS	SCALE: 1:500 @ A3
JOB NUMBER: 21153	DRAWING BY: GC
DRAWING TITLE: FLOOD ZONE MAP	CHECKED BY: JL
REVISION:	DR05