



Oifig an  
Rialaitheora Pleanála  
Office of the  
Planning Regulator

**OPR Ref: IP-034-23**

30<sup>th</sup> November 2023

Carrick-on-Shannon JLAP,  
Forward Planning,  
Leitrim County Council,  
Aras an Chontae,  
Carrick-on-Shannon,  
N41 PF67.

Carrick-on-Shannon JLAP,  
Forward Planning,  
Roscommon County Council,  
Aras an Chontae,  
Roscommon,  
F42 VR98.

**Re: Issues Paper for the Joint Carrick-on-Shannon Local Area Plan 2024-2030**

A chara,

Thank you for your authorities' work in preparing the Issues Paper (the Issues Paper) for the proposed Joint Carrick-on-Shannon Local Area Plan 2024-2030 (the JLAP).

The planning authorities are commended for publishing an Issues Paper, engaging proactively with the public, and notifying the Office of the Planning Regulator (the Office) of the intention to prepare the JLAP.

In accordance with the provisions of section 31AO of the *Planning and Development Act 2000*, as amended (the Act), the Office is obliged to evaluate and assess local area plans to ensure alignment with national and regional planning policy and the objectives of your county development plans.

The Office has set out some broad issues relevant to the preparation of LAPs, in addition to some specific issues of particular relevance to the preparation of this JLAP, under the following headings:

1. [Strategic policy framework](#)
2. [Development plan and core strategy](#)
3. [Zoning, compact growth and infrastructural services](#)
4. [Regeneration](#)
5. [Education, social and community amenities](#)
6. [Economic development, employment and retail](#)
7. [Transport and mobility](#)
8. [Flood Risk Management](#)
9. [Climate action](#)
10. [Environment, built and natural heritage](#)
11. [Implementation and monitoring](#)

The comments are offered without prejudice to any observations and recommendations by the Office at future stages of the plan-making process. They also do not affect the obligation on both planning authorities to comply with the relevant legislative requirements, or to be consistent with the fullness of the detailed policy context of the higher order plans and strategies and Ministerial guidelines.

## **1. Strategic policy framework**

Section 20(5) of the Act requires the JLAP to be consistent with the objectives of the Northern and Western Regional Assembly (NWRA) Regional Spatial and Economic Strategy (RSES), National Planning Framework (NPF), the specific planning policy requirements (SPPRs) of section 28 guidelines and the relevant development plans.

The Office notes that RSES acknowledges that Carrick-on-Shannon, as a Key Town, functions as an economically active town providing an employment catchment for the surrounding areas, and has the capacity to act as a growth driver to complement the region.



Of particular relevance to the JLAP is RPO 3.1, which seeks to deliver compact growth in Key Towns such as Carrick-on-Shannon. This will include the delivery of residential, employment or other uses identified in the town. In particular, the draft JLAP should clearly demonstrate the role of Carrick-on-Shannon within the wider county and regional context.

The Office encourages the planning authorities to liaise with the NWRA in preparation of the draft JLAP, particularly where clarity is required on how the objectives and guiding principles set out in the RSES relate to the JLAP.

## **2. Development plan and core strategy**

Section 19(2)(b) of the Act requires the JLAP to be consistent with the objectives of the development plans and their core strategies. This is also a key message of the section 28 *Local Area Plan Guidelines for Planning Authorities (2013)* (LAP Guidelines).

In this regard, the Office notes that the core strategy of the Leitrim County Development Plan 2023-2029 (Leitrim Development Plan) provides for an increase of 362 housing units over the 2023 – 2029 plan period. The Roscommon County Development Plan 2022-2028 (Roscommon Development Plan) provides for a population increase of 172 persons with a requirement for 64 housing units and 1.8 hectares of residential land being required over the 2022 – 2028 plan period.

A key part of the Office's assessment of the draft JLAP is to consider whether the objectives and zoning provisions of the JLAP are consistent with the level of growth set out in the core strategies. In this regard the draft JLAP should ensure land use zoning is consistent with the core strategies of the relevant county development plan.

## **3. Zoning, compact growth and infrastructural services**

Our assessment will also carefully consider whether proposed zoning objectives can demonstrate consistency with the objectives for compact growth and densification<sup>1</sup> under the NPF (NPO 3; NPO 35) and RSES (RPO 3.2). The implementation of effective compact growth to avoid urban sprawl also plays a key role in climate change mitigation.

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<sup>1</sup> Including through reductions in vacancy, re-use of existing buildings, infill development, area or site-based regeneration and increase building heights.

Zoning objectives should also be consistent with any strategic development sites for the delivery of residential, employment or other uses identified in the RSES.

In relation to residential development, any provisions or standards for density or building height in the draft JLAP should have regard to relevant section 28 guidelines and any SPPRs therein, including:

- *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas: Cities, Towns & Villages (2009);*
- *Urban Development and Building Heights Guidelines for Planning Authorities (2018);* and
- *Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2020).*

Land use zoning should follow a sequential approach so that the development of lands closest to the town centre are prioritised over lands on the outskirts of the town, as set out under section 6.2.3 of the *Development Plans - Guidelines for Planning Authorities (2022)* (the Development Plans Guidelines).

The planning authorities also need to ensure that lands that cannot be serviced within the lifetime of the JLAP are not zoned for development, consistent with the tiered approach to zoning under NPO 72 a-c of the NPF. In this regard, an infrastructure assessment should be prepared in accordance with Appendix 3 of the NPF and section 4.5.2 (Settlement Capacity Audit) of the Development Plans Guidelines.

In this regard, the Office notes that Uisce Éireann has identified that there are sufficient wastewater facilities in place and that there will be sufficient water services in place to accommodate the growth for the town in the short-term, once the ongoing upgrade works and leakage reduction activities are completed. Uisce Éireann has noted the potential need to upgrade water supply infrastructure in the medium to long-term for the town.

The planning authorities are advised to liaise closely with the relevant prescribed authorities concerning the delivery of essential services and infrastructure.

#### 4. Regeneration

Both the NPF (NPO 4 urban places; NPO 6 urban regeneration; NPO 18a proportionate growth; NPO 18b new homes and NPO 35 increasing residential use) and the policy objectives of the RSES emphasise the importance of opportunities for urban and village regeneration to create attractive, liveable, and high quality urban places. The reuse of brownfield sites and vacant buildings will also contribute to climate change mitigation.

It is noted as part of the RSES that Carrick-on-Shannon has a commercial vacancy rate of 17.6% in Quarter 2 2019<sup>2</sup>. As part of the RSES two-year monitoring report it is noted that in 2021 there were 149<sup>3</sup> residential units either vacant or derelict. Based on these figures there are clear opportunities to address derelict and vacant units in Carrick-on-Shannon and the planning authorities are encouraged to strongly focus on this issue as part of the preparation of the draft JLAP.

The Leitrim Development Plan supports regeneration through CS OBJ 5, the identification of sites through HOUS OBJ 10, as well as the development of Market Yard at Carrick-on-Shannon. Furthermore, Section 6.6 in relation to Healthy Placemaking should inform the preparation of regeneration policies and objectives in the draft JLAP. The Roscommon Development Plan supports the regeneration of town centres including vacant buildings (CS 2.5 and 2.6). Regeneration is also encouraged including the utilisation of funding for regeneration purposes (TV 4.11 and TV 4.14). While these general objectives in the Development Plans are welcomed, it is considered that these general objectives should inform the development of more detailed regeneration policies/objectives in the draft JLAP.

In this regard, the JLAP also provides an opportunity to identify opportunity and regeneration sites, or vacant or underutilised buildings, in accordance with the guiding principles of the RSES for urban infill and regeneration, where applicable.

Where such sites are identified, the planning authorities should prepare a development framework for future development with appropriate guidance regarding layout, massing,

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<sup>2</sup> NWRA, RSES 2020-2032, <https://www.nwra.ie/pdfs/NWRA-RSES-2020-2032.pdf> (Last Accessed: 22/11/2023)

<sup>3</sup> NWRA, RSES, Two-Year Monitoring Report 2020-2022 <https://www.nwra.ie/wp-content/uploads/2022/12/rses-2-year-report.pdf> (Last Accessed: 22/11/2023)

permeability, green infrastructure and Sustainable urban Drainage Systems (SuDS) etc. as set out in section 5.7 of the LAP Guidelines.

The Office also acknowledges Leitrim Development Plan Policy (HOUS OBJ 4) and Roscommon Development Plan Policy Objective (CS 2.6 and 2.7) which seeks to engage in active land management and site activation measures. The Office recommends that the draft JLAP supports this policy and provides a strong policy framework to support the utilisation of existing buildings, brownfield/infill sites, and derelict and underutilised sites.

In this regard, the planning authorities should consider proactive land activation measures including the planning authorities' powers for land acquisition / compulsory purchase and derelict sites and vacant land. The plan should also align with sources of funding to facilitate key regeneration projects such as the recently announced *Croí Cónaithe (Towns) Fund Scheme*, and Town Centre First-aligned funding streams under the Government's *Town Centre First: A Policy Approach for Irish Towns (2022)*.

As part of the RSES two-year monitoring report it is noted that funding has been secured for the development of a Town Masterplan for the town (€100,000) in line with the Town Centre First Initiative and that *Urban Regeneration and Development Fund* funding has been secured for the delivery of a *Public Realm Project* in in the town which will deliver a Shannon boardwalk as well as a town centre boardwalk. It is the understanding of the Office, that the public realm works are complete, however, the planning authorities should provide further updates on the completion/success of these projects, as well as details of the Part 8 for the recreational and multi-sport campus, as part of the draft JLAP.

## **5. Education, social and community and amenities**

Access to quality childcare, education and health services is a National Strategic Outcome of the NPF. The JLAP should therefore seek to align population growth with investment in childcare and education facilities on well-located sites within or close to the existing built-up areas, to meet the diverse needs of local populations.

As such, the draft JLAP should be informed by a social or civic infrastructure audit to establish the capacity of existing facilities, including community centres, leisure, amenity and cultural facilities to serve existing and future residents, and identify the need for any additional facilities.

It is also important that access to existing and proposed facilities by walking or cycling is prioritised consistent with the sustainable approach to settlement and mobility discussed below. In this regard, the Office notes that ED POL 3 of the Leitrim Development Plan seeks to ensure that educational facilities maximises opportunities for use of walking, cycling and use of public transport. Policy Objective ITC 7.25 of the Roscommon Development Plan also has a similar approach and it is considered that this should be continued as part of the preparation of the draft JLAP.

Specifically, in relation to schools, the planning authorities should consult with the Forward Planning and Site Acquisitions Section of the Department of Education.

The local authorities' *Local Economic and Community Plan (LECP)* and *Traveller Accommodation Programme* should also inform the draft JLAP to provide for the co-ordinated spatial planning of housing and community services for the area.

## **6. Economic development, employment and retail**

The NPF, RSES and section 28 guidelines emphasise the need to take an evidence-based approach to the inclusion of objectives for employment and other commercial uses.

In particular, the draft JLAP should be aligned with the detailed economic strategy and all relevant guiding principles of the RSES, in addition to any objectives concerning strategic enterprise / employment sites. The RSES and the Leitrim Development Plan identify Carrick Business Campus as a strategic employment land bank for Carrick-on-Shannon. It is also noted that Leitrim County Council has prepared "*Carrick-on-Shannon: The Place to be - Economic Development Plan (2020-2030)*". RPO4.9 as well as 4.10 outline the need to improve tourist infrastructure as well as the associated investments in associated improvements such as public realm. Carrick-on-Shannon is also identified as a "Slow Tourism" location where there is an intention to enable increased bed-nights and visitor numbers. The draft JLAP should ensure an appropriate strategy is provided for the development of employment and enterprise lands, consistent with the guiding principles of RSES and relevant development plans.

In terms of identifying the optimal locations for employment zonings, the key criteria should be compact growth, the sequential approach to development, and the options for sustainable transport having regard to the need to mitigate climate change. The reuse of appropriate brownfield sites and vacant premises should also be prioritised and the



authorities should consider the *Spatial Planning and National Roads Guidelines (2012)*, where relevant.

The facilitation of retail facilities also need to be considered to provide for the anticipated population growth. Particular regard should be given to the sequential approach to the location of retail development and other provisions of the *Retail Planning Guidelines for Planning Authorities (2012)*, and the position of the town in the retail hierarchy of the Development Plans. Moreover, provision for retail development should be addressed as part of the draft JLAP as per RPO 4.46 of the RSES, with a greater focus on the development in the town centre.

The Office also notes that RPO 5.20 and RPO 5.21 seek to support and facilitate the delivery of blueways across the region. This section of the RSES refers to the Shannon Blueway which includes Carrick-on-Shannon. These RPOs note the economic opportunities presented by the delivery of these blueways and such an objective should be supported by the JLAP's economic strategy.

## **7. Transport and mobility**

The *Climate Action Plan 2023* identifies the need to significantly reduce car kilometres and increase sustainable journeys, guided by the *National Sustainable Mobility Policy (2022)* and the proposed *National Demand Management Strategy*.

The integration of land use and transportation is centrally important to this objective and to the objectives and provisions of the NPF (NPO 27 alternatives to the car; NPO 33 location of new homes and NPO 64 air quality, among others) and the RSES.

The RSES identifies the requirement for a local transport plan (LTP) for the town under RPO 6.27. RPO 6.28 also notes that any policies, objectives or measures which emerge from the LTP shall be incorporated into the draft JLAP. The Leitrim Development Plan requires the preparation of a LTP in collaboration with the National Transport Authority (NTA) and Transport Infrastructure Ireland (TII) as part of the preparation of the draft JLAP. The Roscommon Development Plan also commits to the preparation of a LTP as part of policy objective ITC 7.31. While these policies/objectives note the need for both planning authorities to collaborate in the preparation of the LTP, they also commit to the preparation of an LTP to inform the draft JLAP in consultation with the NTA and TII. As part of the preparation of this LTP, the N4 bypass of Carrick-on-Shannon should be



considered, including the opportunity for improved active travel infrastructure in the town centre. There should be consultation with TII in relation to this scheme and if possible the route (or associated route corridor) should be indicated on the land use zoning maps as part of the draft JLAP.

The NTA's and TII's *Area Based Transport Assessment Advice Note* (December 2018) (ABTA) and *ABTA How to Guide Guidance Document Pilot Methodology* (September 2021) should be considered by the planning authorities in preparing the LTP. The LTP should inform the preparation of the draft JLAP and, in particular, the zoning provisions.

While both Development Plans have committed to engaging with prescribed bodies as part of the preparation of the LTP, the Office would stress the need to liaise with the NTA and TII in the preparation of the LTP.

In addition, the LTP should set out an ambitious (but realistic) modal shift target for the area of the JLAP.

In order to increase the potential for trips to be made on foot, bicycle or public transport, the draft JLAP should demonstrate consistency with 'Avoid-Shift-Improve' principle and the '10-minute town concept', as well as providing for the proactive implementation of the *Design Manual for Urban Roads and Streets* (revised 2019) and the NTA's *Permeability Best Practice Guide*.

## **8. Flood risk management**

Having regard to the location of Carrick-on-Shannon along the River Shannon, flood risk management will be the most critical climate change adaptation measure to be addressed in the JLAP, informed by a Strategic Flood Risk Assessment (SFRA).

The planning authorities should ensure that the draft JLAP is consistent with NPO 57 by avoiding inappropriate development in areas at risk of flooding, in accordance with the detailed requirements and provisions of section 28 *The Planning System and Flood Risk Management Guidelines for Planning Authorities* (2009). These guidelines require a staged approach to flood risk assessment and, in particular, the application of the sequential approach and the requirement to carry out the plan-making justification test where appropriate.

The planning authorities should overlay the flood risk zones on any proposed land use zoning maps to illustrate the potential flood risk arising and to demonstrate how the sequential approach has been applied. The planning authorities is also requested to make a copy of digital mapping data available to the Office and to the Office of Public Works (OPW) to facilitate assessment.

Further, given the historic flooding issues in Carrick-on-Shannon as well as the proposal for a flood relief scheme for the town, the planning authorities are strongly advised to liaise with the OPW in the early stages of preparing the SFRA to avoid issues arising at draft JLAP stage.

In accordance with NPO 57, the JLAP is required to integrate sustainable water management solutions, such as SuDS. In this regard, the Office draws the planning authorities' attention to *Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas, Water Sensitive Urban Design, Best Practice Interim Guidance Document (2022)*.

## 9. Climate action

It is a National Strategic Outcome of the NPF to transition to a low carbon climate resilient society. The effective implementation of climate mitigation objectives through the JLAP is critical to the achievement of the Government's Greenhouse Gas emissions reduction target to mitigate climate change under the *Climate Action and Low Carbon Development Act (2015)*, as amended, (Climate Act 2015). As part of the Leitrim Development Plan, it is noted that Carrick-on-Shannon is identified as a decarbonisation zone (CS OBJ 10) and this should be incorporated into the draft JLAP.

The efficient use of land, including through infill development and brownfield development consistent with compact growth, will ensure consistency with NPO 53 (land use). An integrated approach to land use and transport planning will help ensure that climate action is integral to the JLAP in support of national mitigation targets (NPO 54) under the Climate Act 2015. The JLAP should also consider how development in the area might best contribute to the delivery of renewable energy consistent with NPO 55. These NPOs, together with the relevant objectives of the RSES and Development Plans, will be of particular importance in this respect.

The effective implementation of climate adaption objectives through the JLAP will be essential to ensure Carrick-on Shannon is climate resilient into the future. As noted, above, flood risk management will be the most critical climate change adaptation measure to be addressed in the JLAP. *The National Adaptation Framework (2018)* specifies the national strategy for the application of adaptation measures in different sectors and by local authorities in their administrative areas in order to reduce the vulnerability of the State to the negative effects of climate change and to avail of any positive effects that may occur.

## 10. Environment and natural and built heritage

The planning authorities are the competent authorities for Strategic Environmental Assessment and Appropriate Assessment, and will be aware of the section 28 *Strategic Environmental Assessment Guidelines for Regional Assemblies and Planning Authorities (2022)* and the *Appropriate Assessment of Plans and Projects in Ireland Guidance for Planning Authorities (2009)* as revised.

The planning authorities should also ensure the JLAP is consistent with objectives of the NPF and RSES concerning environmental protection. From our experience in assessing statutory plans the Office has found that, in addition to the objectives identified above that might also apply to this subject, particular consideration should be given to:

- NPOs 58 (green infrastructure);
- NPO 62 (greenbelts);
- NPO 63 (water infrastructure); and
- NPO 64 (air quality).

The Office also highlights the importance of integrating green and blue infrastructure into the JLAP consistent with NPO 58. Planning for green and blue infrastructure can contribute to climate change adaptation, in particular flood risk management through nature-based solutions. It can also make a positive contribution to climate mitigation and have positive impacts on biodiversity.

Regarding built-heritage, the planning authorities should consider what location specific objectives or measures would assist in the protection or improvement of built heritage over the period of the JLAP including what policies/objectives are required with regard to the

Architectural Conservation Area identified in the town. Accordingly, the planning authorities should have regard to the *Architectural Heritage Protection Guidelines for Planning Authorities* (2011), as amended.

## 11. Implementation and monitoring

The NPF and the RSES place increased emphasis on the importance of monitoring the implementation of statutory strategies and plans to measure plan effectiveness and to continually update a relevant evidence base to inform future planning strategies.

The planning authorities are therefore encouraged to set out specific provisions for monitoring the implementation of the objectives of the JLAP, having regard to the provisions of the Development Plan Guidelines and the Local Area Plans Guidelines.

Given that this plan involves the co-operation of two local authorities it is of particular importance that a detailed monitoring process is set out in the JLAP. This could usefully include details in relation to proposed co-operation, coordination and governance structures to advance plan implementation. Furthermore, consideration should be given to how the JLAP will be considered by each local authority at the development management stage and if joint development management standards are required for Carrick-on-Shannon.

### Summary

In summary, the Office commends the local authorities for the preparation of this Issues Paper. The Office advises the local authorities to pay particular attention to the following issues in the preparation of the JLAP:

- the provision of zoning for the delivery of housing in serviced or serviceable areas informed by an infrastructure assessment/settlement capacity audit, consistent with compact growth, the sequential approach and with the respective core strategies;
- the inclusion of appropriate policies and objectives and strategies to promote and prioritise regeneration, having regard to the high level of vacancy within the town this is particularly relevant, and the development of infill/brownfield sites and the heritage-sensitive renewal and reuse of vacant and/or derelict buildings, supported by an appropriately detailed active land management strategy;



- the integration of land use and transport planning, including through the preparation of an LTP to inform the JLAP, land use zoning objectives and associated modal share targets, in consultation with the NTA and TII;
- the development of Key Strategic Employment Initiatives for Carrick-on-Shannon and prioritisation of optimal locations for employment zonings, supporting compact growth, the sequential approach and active and sustainable travel modes;
- the inclusion of appropriate policies and objectives to support and enhance linkages from the town to the River Shannon Blueway; and
- ensure that the provisions of the JLAP and associated zoning objectives are fully informed by an SFRA, consistent with the Flood Guidelines, in consultation with the OPW, and promote SuDS and nature based solutions as a means of managing surface water run-off.
- include details of structures and measures for coordination of the implementation of the JLAP, in addition to provisions for monitoring.

The Office looks forward to reviewing the future draft JLAP and to continued positive engagement with both authorities in the implementation of national and regional policies at the county and local level.

Please feel free to contact the staff of the Office in the context of the authorities' responses to the above, which we would be happy to facilitate. Contact can be initiated through the undersigned or at [plans@opr.ie](mailto:plans@opr.ie).

Is mise le meas,

**Anne Marie O'Connor**

Deputy Regulator and Director of Plans Evaluations