



Oifig an
Rialaitheora Pleanála
Office of the
Planning Regulator

12th May 2026

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

Re: Proposed Variation No. 1 to the Leitrim County Development Plan 2023-2029

A chara,

Thank you for your authority's work on preparing the Proposed Variation No. 1 (proposed Variation) to the Leitrim County Development Plan 2023-2029 (Development Plan).

As Leitrim County Council (Planning Authority) is aware, a key function of the Office of the Planning Regulator (Office) is the assessment of statutory plans to ensure consistency with legislative and policy requirements relating to planning. The Office has evaluated and assessed the proposed Variation pursuant to Part 3 of the Planning and Development Act 2024 (Act) and its functions under section 546 and this submission has been prepared accordingly.

Recommendations issued by the Office further to section 58(9) of the Act relate to clear breaches of the relevant legislative provisions, of the national or regional policy framework and/or of the policy of Government. As such, planning authorities are requested to implement or address recommendations made by the Office in order to ensure consistency with the relevant policy and legislative provisions.

Observations issued by the Office pursuant to section 546 of the Act may take the form of a request for further information or justification on a particular matter, or clarification regarding particular provisions of a plan on issues that are considered necessary to ensure alignment with policy and legislative provisions. Planning authorities are requested by the Office to action an observation.

A submission can also include advice on matters that the Office considers would contribute positively to the proper planning and sustainable development of the area. Planning authorities are requested by the Office to give full consideration to the advice contained in a submission.

On adoption of the Variation, the Office will assess it in accordance with the statutory framework in section 63 of the Act.

Overview

The proposed Variation includes a change to the Development Plan with regard to the implementation of the housing growth requirements, the inclusion of Carrick-on-Shannon Joint Local Area Plan 2025-2031 into the Development Plan, the rezoning of land arising from the Residential Zoned Land Tax process and the addition of further Enterprise and Employment lands in Manorhamilton. The proposed Variation includes a number of changes to the Development Plan with regard to the implementation of the housing growth requirements and the following elements:

- core strategy;
- policy amendments; and
- zoning amendments and additions.

The Office notes and welcomes the updating of the core strategy to take account of Census 2022 and the review of the adequacy of existing zoned lands to meet the housing growth requirements, including the 50% additional provision, set out in the NPF Implementation: Housing Growth Requirements (2025). The Office also welcomes that the Planning Authority has been particularly focused on considering the likelihood of lands identified for residential development within the plan being brought forward for development within the remaining period of the plan.

This submission therefore focuses on the integration of the Carrick-on-Shannon Local Transport Plan (LTP) into the Development Plan, the zoning of economic development and employment within Manorhamilton as well as in relation to flood risk management.

The submission below has been prepared to provide a strategic level input to your authority in finalising the proposed Variation. It is within this context the submission below sets out three recommendations and one observation under the following themes:

Key theme	Recommendation	Observation
Carrick-on-Shannon Local Transport Plan	Recommendation 1	-
Flood risk management	Recommendation 2	Observation 1
Economic development and employment	Recommendation 3	-

1. Carrick-on-Shannon Local Transport Plan

As stated in the Regional Spatial and Economic Strategy (RSES) for the Northern and Western Regional Assembly, there is a need to significantly improve the integration of land-use and transport planning in order to deliver on the commitment to have compact growth. This will enhance the connectivity of people and places by promoting sustainable transport options for people of all age groups and levels of mobility. Regional Policy Objective 6.27 of the RSES emphasises the support for such integration including for the Key Town of Carrick-on-Shannon. In this context, the Office recommends that the key measures and monitoring mechanisms arising from the LTP for Carrick-on-Shannon are clearly reflected in the Development Plan.

Recommendation 1 - Local Transport Plan

Having regard to the need for the integration of land use and sustainable transportation, and having considered the following:

- NPO 37 of the NPF (sustainable mobility);
- RPO 6.27 of the RSES (integration of land use and transport);
- RPO 6.28 of the RSES (incorporation of Local Transport Plans into development plans);
- the Climate Action Plan 2025 (reducing vehicle kilometres travelled);
- the Climate Action and Low Carbon Development Act 2015, as amended (mandatory target to reduce greenhouse gas emissions by 51%); and

- the National Sustainable Mobility Policy (2022) (reducing vehicle kilometres travelled),

the Planning Authority is recommended to:

- (i) incorporate parts 4-6 inclusive, from the Carrick-on-Shannon Local Transport Plan (LTP) into the Leitrim County Development Plan 2023-2029; and
- (ii) provide a legible map / series of maps that clearly reflect all existing and proposed active travel and public transport networks throughout the Key Town of Carrick-on-Shannon, as identified in figures 6-7 to 7-6 (inclusive) in the LTP, relative to the land use zonings in Carrick-on-Shannon.

2. Flood risk management

The Office welcomes the preparation of the Strategic Flood Risk Assessment Addendum Report in accordance with National Policy Objective (NPO) 1 of the National Planning Framework First Revision (2025) and The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) (Flood Guidelines).

However, from discussions with the Office of Public Works it would appear that there is an unmodelled watercourse that may impact on Proposed Amendment No 29 in Carrick-on-Shannon. The Planning Authority should undertake a risk assessment in order to establish whether a Stage 3 detailed flood risk assessment is required to be carried out (as set out in section 2.2.1 of the Flood Guidelines), and if necessary to amend or omit the land use zoning to water compatible uses only where it is found that highly vulnerable development is proposed within Flood Zone A/B or less vulnerable development in Flood Zone A and the Plan Making Justification Test has not been passed.

The Office also notes that Proposed Amendment No 10 proposes additional text to be included within section 9.8 Flood Risk Management to state that uses on land associated with mid-range and high-end future climate scenario risk areas identified in various sites within Ballinamore, Dromod, Manorhamilton and Mohill shall be limited to less vulnerable or water compatible uses. With the exception of one proposed site for Enterprise and Employment (Proposed Amendment No. 38), these sites (Proposed Amendments Nos 34, 37, 43 and 47) are all identified as New Residential land which are classified as highly vulnerable development within the Flood Guidelines. The Office advises the Planning

Authority to review these zonings taking account of the potential impacts of climate change on flood risk.

Recommendation 2 - Flood Risk Management

Having considered:

- NPO 78 of the NPF to avoid inappropriate development in areas at risk of flooding that do not pass the Plan Making Justification Test (Justification Test);
- RPO 3.10 of the RSES to integrate sustainable water management solutions and assess flood risk by implementing The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) (Flood Guidelines); and
- the Flood Guidelines,

the Office recommends that the Planning Authority determines if a Stage 3 flood risk assessment is required for Proposed Amendment No. 29 due to the presence of an unmapped watercourse which has no flood risk extent illustrated on the flood zone mapping. If required, the Planning Authority should undertake a Stage 3 assessment and if necessary, re-zone the land for an appropriate use consistent with the Flood Guidelines.

In the interests of clarity, highly vulnerable development should not be facilitated within Flood Zone A or B, or less vulnerable development in Flood Zone A, where the Justification Test has not been passed.

The Planning Authority is advised to liaise with the Office of Public Works to address this recommendation.

Observation 1 - Flood Risk Management-Climate Change Scenario

Having regard to flood risk management and having considered:

- NPO 78 of the NPF (potential impacts of climate change on flooding and flood risk);

- RPO 3.10 of the RSES to integrate sustainable water management solutions and assess flood risk by implementing The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) (Flood Guidelines); and
- the Flood Guidelines,

the Planning Authority is advised to review Proposed Amendments Nos 34, 37, 43 and 47 and, if required, re-zone the land for an appropriate use consistent with the Flood Guidelines.

The Planning Authority is advised to liaise with the Office of Public Works to address observation.

3. Economic development and employment

The proposed Variation includes the addition of further lands in Manorhamilton with an Enterprise and Employment land use objective (Proposed Amendment No 38). The Office notes that the reasoning for this amendment is to facilitate heavy industry. However, the land use zoning matrix for Carrick-on-Shannon contained within table 6.8 of the proposed Variation indicates that retail, commercial, community, cultural and recreation and leisure land uses would be open to consideration by the Planning Authority on such a zoning. The capacity of the location to accommodate such alternative uses would require comprehensive assessment in terms of the required provision of infrastructure. The lands are also outside the built-up urban area where retail uses would be likely to undermine the vibrancy and vitality of the town centre and would not promote a sequential approach to retail development as set out in the Retail Planning Guidelines for Planning Authorities (2012).

It is also noted that there are three other areas within the settlement which are zoned for Enterprise and Employment use and are better located in terms of proximity to, and integration with, the town centre, supporting economic synergies and growth.

Therefore, in order to avoid any misperception and prevent conflicting uses that may give rise to competing operational and environmental requirements, it is recommended that the Planning Authority amend this zoning to specifically Heavy Industry.

Recommendation 3 - Economic Development and Employment

Having considered:

- NPO 19 and NSO 6 of the NPF (identification of locations for strategic employment development and supporting a strong economy);
- NPO 14 of the NPF (regeneration of towns and villages);
- RPO 3.13 and 9.3 of the RSES (supporting employment and planning for a vibrant economy);
- section 6.2.5 Development Plans, Guidelines for Planning Authorities (2022) (zoning for employment uses);
- the sequential approach to development as set out in the Retail Planning Guidelines for Planning Authorities (2012) (Retail Planning Guidelines); and
- Retail Planning Guidelines,

the Office recommends that the Planning Authority amend Proposed Amendment No. 38 and map No. 14 to indicate that the lands are specifically zoned for heavy industry.

4. Procedural and other matters

Proposed Amendment No. 20 would benefit from clarification by the Planning Authority. It refers to the introduction of one new objective, however two reference numbers are identified (MHN 22 and 23) and it is said to relate to residential development despite it being proposed within section 3.5 Economic Development, Volume II, Chapter 3: Manorhamilton. It should also state which lands it relates to, presumably those relating to Proposed Amendment No. 37.

Uisce Éireann continuously monitors the growth in settlements, reviewing available water supply and wastewater treatment capacities. Its Capacity Register is published annually, and the remaining available capacity regularly changes. Consequently, the Planning Authority may wish to highlight that the capacity figures indicated within the proposed Variation's accompanying Settlement Capacity Report are dynamic and subject to change.

Summary

The Office requests that your authority addresses the recommendations and observations outlined above. As you are aware, the report of the Chief Executive of your authority prepared for the elected members under section 58(11) of the Act must summarise these recommendations and the manner in which the Chief Executive proposes to address them.

Where a Planning Authority makes a variation, it is required to notify the Office **within one week** of the decision to adopt the Variation. Where an authority decides not to comply with the recommendations of the Office, then it shall inform the Office as soon as practicable and provide reasons for the decision not to so comply.

Your authority is also required to send the Office a copy of the Variation and any submissions made by the Minister, the relevant regional assembly and the National Transport Authority during the Variation preparation process.

Please be advised that planning authorities are also required to publish notice of the Variation within a week of the adoption, stating that a copy of the County Development Plan as varied will be available for inspection on a website and at a place specified in the notice no later than five weeks after the date of adoption.

Please feel free to contact the 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 plans@opr.ie.

Is mise le meas,



Anne Marie O'Connor

Deputy Regulator and Director of Plans Evaluation

Designated Public Official under the Regulation of Lobbying Act 2015