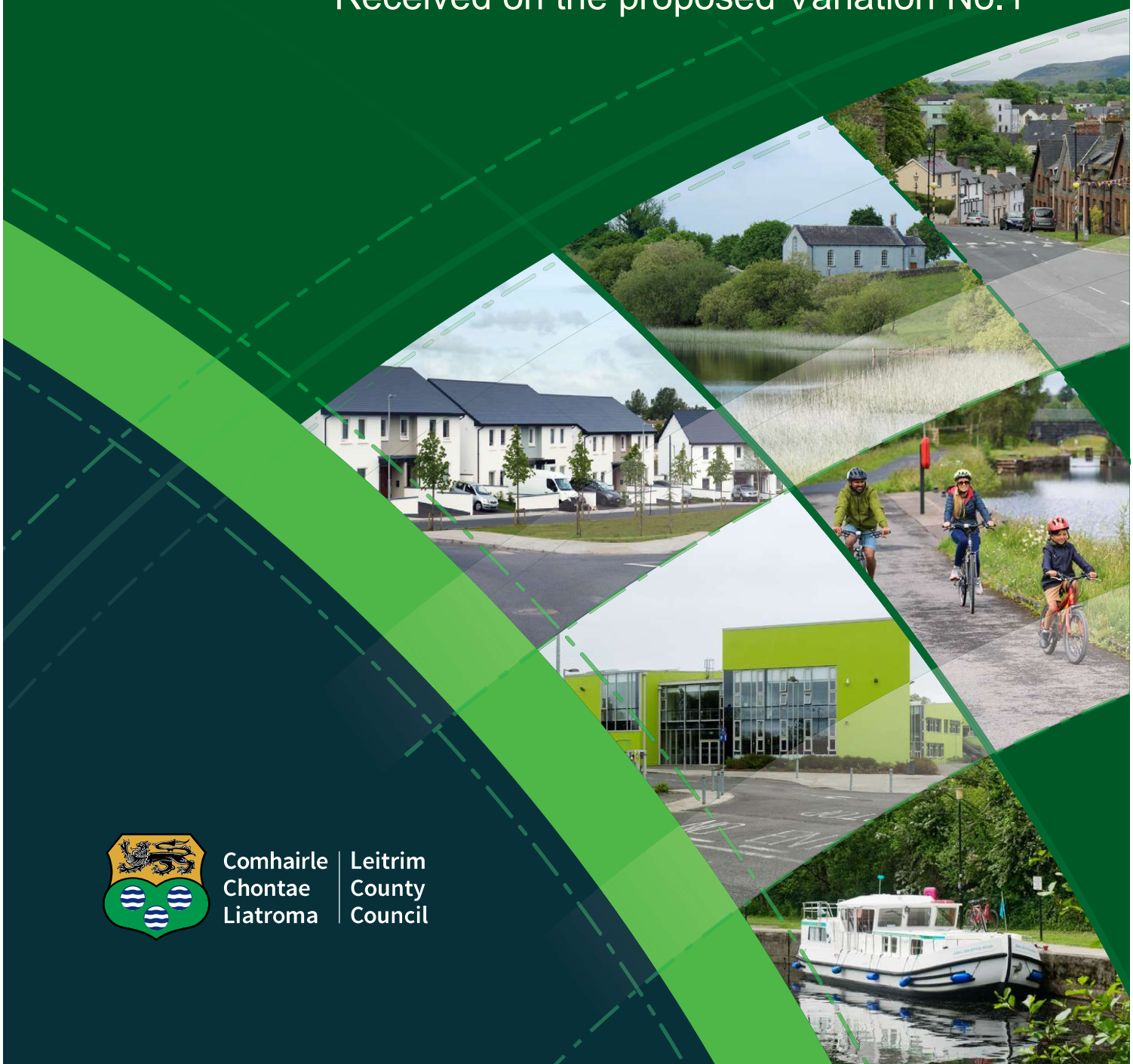
Leitrim County Development Plan 2023-2029

Proposed Variation No. 1

Chief Executive's Report on Submissions Received on the proposed Variation No.1



Comhairle Chontae Liatroma | Leitrim County Council

Comhairle Chontae Liatroma
Leitrim County Council

I, Mary Quinn, Deputy Chief Executive of Leitrim County Council issue this Report to the Elected Members of Leitrim County Council for your consideration. Its purpose is to report on the outcome of the statutory consultation process of the proposed Variation No. 1 to the Leitrim County Development Plan 2023-2029, as prescribed in Section 58(11) of the Planning and Development Act 2024, as amended.

In accordance with legislation, this Report lists the persons or bodies who made submissions or observations to the proposed Variation No. 1 to the Leitrim County Development Plan 2023-2029. It provides a summary of the issues raised in the 22 no. submissions or observations made with respect to the proposed Variation No. 1 to the Plan including the submission received by the Office of the Planning Regulator. The Report sets out my response to the issues raised and recommends that a modified version of the proposed Variation be made.

If it is resolved to make a modified version of the proposed Variation, and the modification(s) constitutes a material alteration to the Variation, the Variation shall be deemed not to have been made, and Leitrim County Council shall publish the modification(s) that constitute a material alteration not later than 2 weeks after the passing of the resolution.

Mary Quinn,
Deputy Chief Executive,
Leitrim County Council

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Section 1

Introduction



1. Introduction

1.1 Introduction and Legislative Context

In accordance with Section 58(4) of the Planning and Development Act 2024 (as amended), Leitrim County Council is proposing Variation No. 1 of the Leitrim County Development Plan 2023-2029 (LCDP 23-29).

The purpose of this report is to:

- summarise the written submissions received in relation to the proposed Variation during the public consultation period,
- set out the Chief Executive's response to the issues raised in the submissions and
- make recommendations to the Elected Members on the issues arising from the consultation process.

This report is being furnished to the Elected Members of Leitrim County Council in accordance with Section 58(11) of the Planning and Development Act 2024, as amended, for your consideration.

1.2 Content of the Proposed Variation

The proposed Variation includes amendments to the Written Statement (Volume I), Settlement Plans (Volume II) and the Book of Maps (Volume III) of the LCDP 23-29 and the amendments are presented in Section 4.0 of the published Variation. The proposed amendments included in this proposed Variation are outlined, in summary, below:

1. To include the addition of further lands with a '*New Residential*' land use zoning objective to address the new housing growth requirements.
2. To include the land use zoning objectives and the land use zoning map for Carrick-on-Shannon as contained in the Carrick-on-Shannon Joint Local Area Plan 2025-2031 into the LCDP 23-29 thereby ensuring that all zoned lands in the county are now contained in the LCDP 23-29.
3. To rezone a parcel of land in Kinlough currently identified with a '*New Residential – Low Density'* land use zoning objective to '*Agriculture*' arising from a submission to the Residential Zoned Land Tax (RZLT) process.
4. To include the addition of further lands in Manorhamilton with an '*Enterprise and Employment'* land use zoning objective.
5. To update Section 8.11.2.1 of the Plan - *N4 Carrick-on-Shannon to Dromod Project* - to reflect the revised scope of the project to now comprise the Carrick-on-Shannon Bypass and Traffic Management Plan and reference in objective TRAN OBJ 3 to same.
6. To update the text to the LCDP 23-29 as consequential changes arising from the foregoing.

1.3 Public Consultation

In accordance with the provisions of the Planning and Development Act 2024, as amended, the Council published a statutory notice in the Leitrim Observer (published on the 13th of April 2026) The proposed Variation was put on public display from the 15th of April 2026 until the 13th of May 2026. The proposed Variation, SEA Environmental Report, SEA screening determination, AA Screening Report, AA screening determination, Strategic Flood Risk Assessment, were on public display at the following locations:

- Planning Department, Leitrim County Council, Áras an Chontae, Carrick-on-Shannon, Co. Leitrim.
- Online on the Leitrim County Council website.

Following the public consultation on the proposed Variation, 22 no. valid written submissions have been received. Appendix 1 of this report provides a list of the persons / bodies who made submissions on the proposed Variation.

1.4 Consideration of the Variation

The Elected Members of the Planning Authority are required to consider the proposed Variation and this Chief Executive's Report, and this is to be completed within 6 weeks from the date of submission of this Report.

In making a variation to a development plan, the Elected Members are restricted to considering the proper planning and sustainable development of the area, the statutory obligations of a Local Authority and any relevant policies or objectives of the Government or any Minister of the Government.

The Elected Members of the Authority, having considered the proposed Variation and this report may, as they consider appropriate, by resolution:

1. Make the proposed Variation
2. Make a modified version of the proposed Variation

If the Planning Authority, after considering a submission, observation or recommendation from the Minister or Office of the Planning Regulator (OPR), decides not to comply with a recommendation made by such, it shall so inform the Minister or OPR as relevant as soon as practicable by written notice and shall include the reasons for the decision.

If it is resolved to make a modified version of the proposed Variation, and the modification constitutes a material alteration to the Variation, the Variation shall be deemed not to have been made.

Not later than 2 weeks after the passing of the resolution, the Planning Authority shall publish notice of the modification that constitutes a material alteration.

The Planning Authority must review the alteration in the context of SEA and AA and determine its implications (if any) on the environment. If an SEA or AA is required, the 2-week period may be extended by such period as the Chief Executive considers necessary to facilitate any necessary assessments.

Thereafter, the Planning Authority must publish notice of the proposed material alteration (and relevant information relating to SEA and AA). A further 4-week period is allowed for public consultation and for lodgement of written submissions.

1.5 Structure of Report

Following this Introduction, the structure of this report is as follows:

- Section 2 – Chief Executive summary, responses and recommendations to the submission from the Office of the Planning Regulator (OPR),
- Section 3 - Chief Executive summary, response and recommendations to submissions from prescribed bodies,
- Section 4 - Chief Executive summary, response and recommendations to submissions received from other stakeholders and the general public.

In response to submissions received, the Chief Executive may recommend changes to the text of the amendments in the proposed Variation, the provision of additional amendments to the County Development Plan or changes the documents accompanying the proposed Variation. The recommended deletions to the amendments in the proposed Variation, the Plan and the accompanying documents in this Chief Executive's Report are denoted with a ~~blue strikethrough~~. The recommended new text in the proposed Variation, the Plan and the accompanying documents in this Chief Executive's Report are shown in yellow.

Sections 2, 3, and 4 address the issues raised in the each of the submissions received. The submissions are addressed individually in this report and in cases where a relevant recommendation has previously been given in an earlier submission, reference to such a recommendation is made in any relevant subsequent submission which addresses the same issue in order to reduce repetition.

Section 2

Submission from the Office of the Planning Regulator (OPR)

Submission Reference Number:	VAR SUB 1-12
Submitted by:	Office of the Planning Regulator (OPR)

Summary of Submission:

The introductory section of the submission explains the distinction between '*recommendations*' and '*observations*' which have been made in the submission and the following definitions have been provided:

'*Recommendations*' 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, the Planning Authority is required to implement or address recommendations made by the Office in order to ensure consistency with the relevant policy and legislative provisions.

'*Observations*' take the form of requests for further information, justification on a particular matter, or clarification regarding particular provisions of the proposed Variation on issues that are required to ensure alignment with policy and legislative provisions. As such, the Planning Authority is requested by the OPR to action an observation.

In the overview section, the submission 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. The submission also welcomes the focus 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.

The submission evaluates the proposed Variation under a number of headings and sets out recommendations and observations in respect of the following:

- Carrick-on-Shannon Local Transport Plan
- Flood risk management
- Economic development and employment

The following provides a summary of the issues raised in respect of each of the headings, along with the respective responses and recommendations of the Chief Executive.

1. Carrick-on-Shannon Local Transport Plan (LTP)

Regional Policy Objective 6.27 of the Regional Spatial and Economic Strategy (RSES) for the Northern and Western Regional Assembly emphasises the support for such integration including for the Key Town of Carrick-on-Shannon. The submissions 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.

Chief Executive's Response:

The comments relating to the LTP are noted and it is accepted that the LCDP 23-29 would benefit from its inclusion which would further incorporate the measures proposed in the LTP. The merit of including mapping of the proposed measures included in the LTP is questioned, given that the mapping and data is included in the LTP itself and it is considered that repetition of the mapping is not required. It is not considered necessary to duplicate these maps again in the body of the LCDP 23-29.

Chief Executive's Recommendation:

CE Recommendation no. 1: To include the Carrick-on-Shannon Local Transport Plan, which was prepared as part of the Carrick-on-Shannon Joint Local Area Plan 2025-2031, into the LCDP 23-29 as Appendix XIII.

CE Recommendation no. 2: To include the following wording at the end of Section 8.7 *Promoting Sustainable Mobility* of the LCDP23-29:

As part of the preparation of Carrick-on-Shannon Joint Local Area Plan 2025-2031, a Local Transport Plan (LTP) has been undertaken on behalf of Leitrim and Roscommon County Councils and in conjunction with the National Transport Authority (NTA). The LTP, included as Appendix XIII, examines existing and proposed transport infrastructure for all modes of transport, including walking and cycling, and provides some insight into existing transport patterns and constraints.

The detail associated with new transport infrastructure projects referred to in this Plan and associated LTP, including locations and any associated mapping, that are not already permitted or provided for by existing plans/programmes/etc. is non-binding and indicative. Such new projects shall be subject to feasibility assessment, taking into account the environmental constraints and the objectives of the Plan relating to sustainable mobility. A Corridor and Route Selection Process will be undertaken for such projects where appropriate. Proposed interventions will be required to demonstrate that they are consistent with all relevant legislative requirements.

The implementation of the transport strategies proposed should lead to a significant reduction in private motor vehicle mode share for the study area from 67% in 2022 to 49% in 2042 for all commuting trips. The active travel and public transport share target for all commuting trips is to see an increase from 33% in 2022 to 51% in 2042.

CE Recommendation no. 3: To revise the wording of Objective MSSM OBJ 1, as stated in Section 8.7 *Promoting Sustainable Mobility* of the LCDP23-29, as follows:

~~To prepare a Local Transport Plan in collaboration with the National Transport Authority (NTA), Transport Infrastructure Ireland (TII), Roscommon County Council and other relevant stakeholders for the Key Town of Carrick on Shannon and establish specific modal share targets for the town to be incorporated into the forthcoming Carrick-on-Shannon Local Area Plan. This will include devising and implementing an effective monitoring programme for the achievement of the modal share targets contained therein.~~

Progress the delivery of the appropriate measures and interventions as outlined in the Carrick-on-Shannon Local Transport Plan (LTP) on a phased basis and subject to the availability of funding, in order to support the shift towards sustainable travel and transport throughout the joint urban area and to accommodate anticipated transport demand due to planned population growth.

2. Flood Risk Management

The submission welcomes the preparation of the Strategic Flood Risk Assessment Addendum Report in accordance with National Policy Objective (NPO) 1 of the *National Planning Framework (NPF) First Revision* (2025) and *The Planning System and Flood Risk Management Guidelines for Planning Authorities* (2009) (Flood Guidelines). 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. 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 submission also notes that Proposed Amendment No. 10 proposes additional text to be included within section 9.8 Flood Risk Management relating to uses on land associated with mid-range and high-end future climate scenario risk areas 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 are classified as highly vulnerable development within the Flood Guidelines, and the Planning Authority is advised to review these zonings.

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.

Chief Executive's Response:

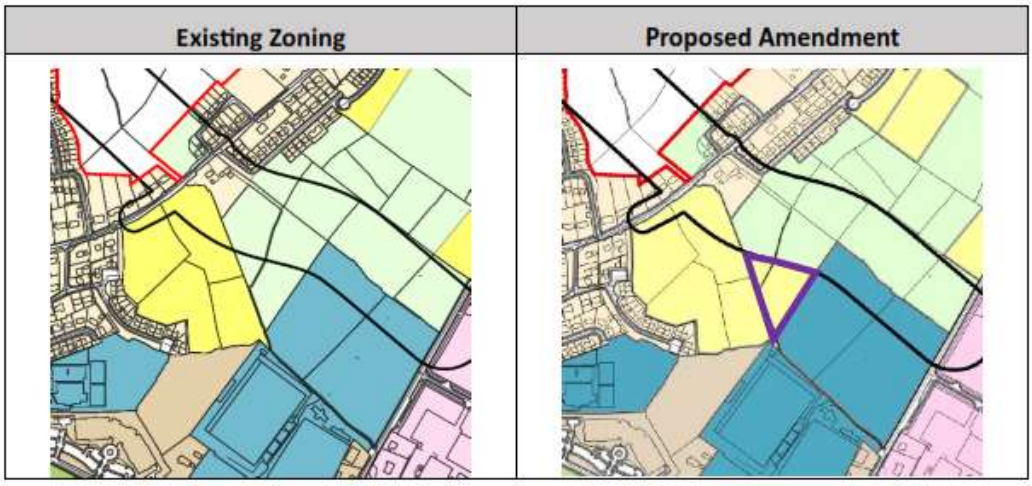


Figure 1: Proposed Amendment No. 29

With regards to Proposed Amendment No. 29 (see Figure 1 above), the watercourse that is being referred to, was considered as part of the Sustainable Flood Risk Assessment (SFRA) undertaken as part of preparing the draft JLAP and again considered as part of the preparation of the proposed Variation. It was determined that Proposed Amendment No. 29 is situated within Flood Zone C – therefore Stage 3 SFRA was not required. The site is on elevated ground rising away from the watercourse, approximately 20 m away from the watercourse.

When proposing lands to be zoned, Leitrim County Council will continue to implement best practice as advocated by '*The Planning System and Flood Risk Management Guidelines for Planning Authorities* (2009)'.

With regard to Proposed Amendments No. 34, 37, 43 and 47, it is not considered necessary for the proposed Variation to be amended in this instance. Dwellings/residential uses are defined by the *Flood Risk Management Guidelines* as highly vulnerable uses (as opposed to less vulnerable uses or water compatible uses). The Variation proposes the following amendment into Section 9.8 "Flood Risk Management" of the Plan:

> *"Uses on lands associated with mid-range and high-end future climate scenario risk areas on Variation No. 1 sites within Ballinamore, Dromod, Manorhamilton and Mohill as identified in Appendix I of the SFRA Addendum shall be limited to less vulnerable or water compatible uses. This limitation shall take primacy over any other related land use zoning provision."*

On that basis, highly vulnerable uses (including dwellings/residential uses) cannot be developed on such lands where there is an overlap with future climate scenario risk areas.

Chief Executive's Recommendation:

No change recommended.

3. Economic Development and Employment

With regard to Proposed Amendment No. 38, the submission 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 allows for a number of other land uses. The capacity of the location to accommodate such alternative uses would require comprehensive assessment in terms of the required provision of infrastructure. 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. It is recommended that the Planning Authority amend this zoning to specifically *Heavy Industry* use.

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.

Chief Executive's Response:

Proposed Amendment No. 38 relates to the zoning of lands with an as '*Agriculture*' and '*Enterprise and Employment*' land use zoning objectives in the townlands of Ross and Tuckmillpark, Manorhamilton. It is noted that there are other areas in Manorhamilton identified with an '*Enterprise and Employment*' land use zoning objective, however, it is contended that the other areas are more suited to light industrial uses similar to the existing industries that are located in the town and are not conducive to heavier industrial uses.

The submission highlights that the proposal to introduce Table 6.8 (land use zoning matrix for Carrick-on-Shannon) as part of the Variation may lead to conflicting uses on lands with an '*Enterprise and Employment*' land use zoning objective. It is important to point out that Table 6.8 refers to the land use zoning objectives of Carrick-on-Shannon only and does not replace the land use zoning matrix for the remainder of ~~for~~ the county that is set out in Table 6.5 of the LCDP 2023-2029. In this land use zoning matrix i.e. Table 6.5 of the LCDP 2023-2029, retail, commercial, community, cultural and recreation and leisure land uses are generally '*not permitted*' in principle. Accordingly, the proposed zoning would not undermine the vibrancy and vitality of the town centre, and it is considered that a distinct land use zoning objective for '*Heavy Industry*' is not warranted.

Chief Executive's Recommendation:

No Change Recommended.

4. Procedural and other matters

Proposed Amendment No. 20 would benefit from clarification from the Planning Authority.

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.

Chief Executive's Response:

Proposed Amendment No. 20 refers to the inclusion of an additional Residential Development objective in the Manorhamilton Settlement Plan. The introduction of an additional objective requires consequential numbering changes to each subsequent objective and all numbering will be finalised once the variation process is concluded. To reduce confusion further, the objective will be included on the Manorhamilton Objectives Map.

The comments relating to the Settlement Capacity Report are noted and reference to the Capacity Registers being subject to change will be included. The inclusion of these additional references are not considered by the Planning Authority to amount to a Material Alteration of the proposed Variation and it is recommended that they are included prior to the Variation being made.

Chief Executive's Recommendation:

CE Recommendation no. 4: To include the following wording in Section 1.2 *'Uisce Éireann Capacity Registers'* of the Settlement Capacity Report published as part of the proposed Variation: It should be noted that the figures included in the Uisce Éireann Capacity Reports are dynamic and subject to change.

Section 3

Submissions from Prescribed Bodies

Submission Reference Number:	VAR SUB 1-2
Submitted by:	Health and Safety Authority

Summary of Submission:

The submission acknowledges the contents of the proposed Variation.

Chief Executive's Response:

The contents of the submission are noted.

Chief Executive's Recommendation:

No Change Recommended.

Submission Reference Number:	VAR SUB 1-4
Submitted by:	Transport Infrastructure Ireland (TII)

Summary of Submission:

The submission acknowledges the contents of the proposed Variation and notes Proposed Amendment no. 9 which relates to Section 8.11.2.1 of the LCDP 23-29. Proposed Amendment no. 9 is consistent with the project citation included in '*National Development Plan Review 2025 Securing Ireland's Future Sectoral Investment Plan: Transport'*.

In the interests of clarity, TII recommends that an explanatory note be included within Proposed Amendment no. 9 in relation to the reference within the National Development Plan Investment Objective where the project title remains *'N4 Carrick-on-Shannon to Dromod Scheme*'. Such an explanatory note would provide clarity and ensure consistency and potentially avoid any unintended consequences when submitting the scheme for future consent.

The submission also recommends that Leitrim County Council continue to consult with the National Road Design Office Project Team and Roscommon County Council in relation to the project and consistency of approach to text references in this regard.

Chief Executive's Response:

The commentary relating to Proposed Amendment no. 9 and the need for an explanatory note outlining the need to update the citation of the *'N4 Carrick-on-Shannon to Dromod Scheme*' is noted and it is considered that the Plan and the Scheme would benefit from such an explanatory note.

Chief Executive's Recommendation:

CE Recommendation no.5. Revise Proposed Amendment no. 9 to include the following:

It should be noted that the '*Carrick-on-Shannon Bypass and Traffic Management Plan'* project citation within the National Development Plan Investment Objective remains *'N4 Carrick-on-Shannon to Dromod Scheme*'.

Submission Reference Number:	VAR SUB 1-5
Submitted by:	Dept. of Education and Youth

Summary of Submission:

The submission notes the increase in potential yield on zoned lands and outlines that the development of 1,986 no. units could result in an additional 5,000+ people for County Leitrim. This could see the demand for school places increase and could place considerable pressure on existing schools to cater for the extra school place requirements across the various settlements in the county.

The submission outlines the Department's preference to expand existing facilities (if possible) should there be a requirement for additional school places resulting from planned population increases and requests the Planning Authority to examine the potential of protecting a land buffer around each school to enable them to expand further if required.

Carrick-on-Shannon

The projected total household yield of 644 no. units is noted and, should these figures materialise, could see an increase in primary and post-primary school place demand, which potentially could be met by the possible expansion of the existing facilities, if required.

The submission notes Proposed Amendment No. 31 to change the land use zoning objective from '*Social and Community*' to '*New Residential*'. The submissions further notes that there is currently no requirement for a new school in Carrick-on-Shannon but there may be a requirement for an expansion of an existing school and that the Department's preference is always to expand existing facilities (if possible). It is requested that the Planning Authority to examine the potential of protecting a land buffer around each school to enable them to expand further if required. The proposed re-zoned lands as per Amendment No 31. are adjacent to Gaelscoil Liatroma. It is acknowledged that the purpose of the site was originally for a nursing home. Notwithstanding that this site will now be re-zoned for residential development purposes, the Department requests the Council to ensure that there are sufficient lands available to cater for the potential expansion of the school should that ever be required.

Ballinamore

The projected total household yield of 166 no. units is noted and, should these figures materialise, could see an increase in primary and post-primary school place demand, which potentially could be met by the possible expansion of the existing facilities, if required.

The submission notes Proposed Amendment No. 36 to Change the land use zoning objective from '*Social and Community*' to 'Mixed Use'. The lands are to the rear of Scoil Chlann Naofa which is the only primary school in Ballinamore and while there is currently no requirement for a new school in Ballinamore, there may be a requirement for an expansion to this existing school at some stage in the future.

Manorhamilton

The projected total household yield of 189 no. units is noted and, should these figures materialise, could see an increase in primary and post-primary school place demand, which potentially could be met by the possible expansion of the existing facilities, if required.

Other settlements

Projected growth figures outlined in the variation could see increases in primary school and post primary demand in Dromahair, Drumshanbo, Mohill, Kinlough and Dromod which potentially could be met by the possible expansion of the existing facilities, if required.

In terms of the identification of sites for future new schools or the requirement of new sites to facilitate the relocation of existing schools, the Department would like to highlight the following points:

Schools are enabling infrastructure for housing and as such, schools should be positioned in the heart of new and expanding sustainable communities and other community facilities and amenities should also be positioned close to school facilities. All enabling infrastructure required to develop and operate school facilities should be provided in advance of the need for such schools such as road, electricity, water infrastructure, sustainable transport links, active travel networks, road safety measures and safe routes to school facilities. The submission notes that it is not within the remit of the Department of Education and Youth to develop or fund this enabling infrastructure.

The Proposed Amendment No. 28 which seeks to change the land use zoning objective of land in Carrick-on-Shannon from '*Social and Community*' to '*New Residential*' and Proposed Amendment No. 40 which seeks to change the land use zoning objective of land in Dromahair from '*Social and Community*' to '*New Residential*' are noted.

The Department also anticipates that additional Special Education Needs (SEN) provision at both Primary and Post Primary level will be required in the future throughout the country and this may result in schools requiring additional accommodation or space to meet this growing need. The continuing need for additional provision across the country, including in County Leitrim, is kept under constant review. In this regard, the Department will consult with the Council if and when additional special education needs accommodation or sites for future special schools are required within specific locations.

In the context of this variation and being mindful of a substantial population growth that may arise from the various future planned housing developments within its environs, the Department would welcome explicit support within the plan for the provision of school accommodation for children and young people with special educational needs.

In terms of assessing current and future capacity, the Department of Education and Youth has to be mindful of potential unforeseen circumstances, which have the ability to put undue pressure on school place provision and could necessitate reassessments of school place provision from time to time.

Chief Executive's Response:

The contents of the submission and the Department's preference to expand existing facilities (if possible) should there be a requirement for additional school places are noted.

With regard to the request that the Council examine the potential of protecting a land buffer around each of the schools to enable them to expand further, if required, it is considered that Policy ED POL 5 in the LCDP 23-29 already provides sufficient policy support in this regard. For clarity, it states – "*To consider the need for buffer zones and land use designations to support the strategic development of existing schools adjacent to existing and established schools (where required to facilitate potential future expansion)*". Moreover, in relation to the request for school sites and their entirety to be zoned education, the LCDP 23-29 prescribes a land use zoning

objective of '*Social and Community'* with the objective to "*protect and provide for community, social, recreational and educational services and facilities*". It is considered that this land use zoning objective adequately addresses this issue.

With regard to Proposed Amendment No. 31, it should be noted that planning permission for a nursing home development had been permitted on this site under planning register reference number 19/136 and at no time was it considered as part of any future expansion to the Gaelscoil. The Carrick-on-Shannon JLAP which was adopted in 2025 included a specific objective on these lands for the development of a *Nursing Home* facility (Objective SC 14) on foot of a submission from the landowners. In terms of providing sufficient lands for primary school expansion, the Carrick-on-Shannon JLAP also included an objective to facilitate the development of a new primary school on the lands zoned for *Social and Community* uses at and adjacent to the St. Mary's Boys school (Objective SC 7 refers). It is further noted that the submissions received form the Department of Education and Youth during the JLAP preparation process did not mention any requirement for these lands subject to Proposed Amendment No. 31 for the expansion of the existing Gaelscoil. It is also worth reminding the Elected Members that the Department was offered a more expansive site on the Castlecara Road for a school site by the Local Authority but decided on the extent of lands required which was sold to them.

With regard to Proposed Amendment No. 36 in Ballinamore, the proposal to change the land use zoning objective from *'Social and Community'* to '*Mixed Use'* will not have a material impact on the ability of the National School to expand in the future given that there is approximately 3.75 Ha of lands with a '*Social and Community'* land use zoning objective to the immediate rear of the School.

The Council welcomes any future engagement with the Department with regard to school place provision including any additional special education needs provision as required to meet demand.

In relation to the Department's request that explicit support is included within the plan for the provision of school accommodation for children and young people with special educational needs, it is respectfully considered that this is not within the scope of the published variation and a matter that can be acceded to in the review of the CDP 23-29 and the preparation of the new 10 year replacement plan.

Chief Executive's Recommendation:

No Change Recommended.

Submission Reference Number:	VAR SUB 1-6
Submitted by:	Environmental Protection Agency (EPA)

Summary of Submission:

The EPA refer to the *SEA of Local Authority Land Use Plans – EPA Recommendations and Resources* document which sets out key recommendations for integrating environmental considerations into Local Authority land use plans.

The submission contains general advice on the need to ensure the Variation aligns with relevant objectives and policy commitments of the *National Planning Framework* and the *Northern and Western Regional Spatial and Economic Strategy*.

Advice is provided on information to be contained in the Environmental Report (i.e. the SEA accompanying the Variation) as per the SEA Regulations in terms of Mitigation Measures and Monitoring.

In respect of any future amendments to the Plan, the EPA advise that such amendments should be screened for likely significant effects, using the same method of assessment applied in the '*environmental assessment*' of the Plan.

The final element of advice provided by the EPA relates to the adoption of the Variation, which should be accompanied by an SEA Statement, as per standard procedure and this should be advanced to the relevant prescribed environmental authorities and relevant stakeholders.

Chief Executive's Response:

The '*SEA of Local Authority Land Use Plans – EPA Recommendations and Resources*' document has been considered in the preparation of the SEA Report and will be kept on file for reference throughout the SEA process.

The proposed Variation aligns with key relevant higher-level plans and programmes and is consistent with the relevant objectives and policy commitments of the NPF and the Northern and Western Assembly RSES.

Appropriate mitigation measures are cited in Section 9 of the SEA Environmental Report and have been integrated into the proposed Variation or existing Leitrim County Development Plan.

Appropriate monitoring measures and associated information are cited in Section 10 of the SEA Environmental Report. When the County Development Plan is being reviewed, information relating to monitoring programmes will be considered and will inform the SEA and the review. The Guidance from the EPA on SEA Monitoring has been taken into account in preparing the monitoring section for the SEA ER.

Any further alterations to the proposed Variation will be screened for likely significant environmental effects in accordance with SEA Regulations.

Following the making of the Variation, an SEA Statement will be prepared including the required information and taking into account the EPA guidance on SEA Statements.

Chief Executive's Recommendation:

No Change Recommended.

Submission Reference Number:	VAR SUB 1-9
Submitted by:	National Transport Authority (NTA)

Summary of Submission:

The submission evaluates the Variation under a number of headings and sets out a number of recommendations.

1. Background

While there are several parts to the proposed Variation, the submission relates only to the addition of further lands with a '*New Residential*' land use zoning objective, the inclusion of the land use zoning objectives and the land use zoning map for Carrick-on-Shannon as contained in the Carrick-on-Shannon Joint Local Area Plan 2025-2031 and the consequential textual changes arising from this.

2. Settlement Capacity Audit & Transport requirements

The submission refers to the *'NPF Implementation: Housing Growth Requirements Guidelines for Planning Authorities'* and the requirement for a Settlement Capacity Audit (SCA) to be prepared and notes the preparation of such an Audit as part of the Variation.

It is recommended to amend and strengthen the SCA to *'highlight infrastructural requirements'* and to *'specify enabling infrastructure'* for transport required to service lands. With regard to Carrick-on-Shannon, the SCA should refer to the Local Transport Plan for the town.

Recommendation

The NTA recommend, in the interests of sustainable development and to avoid car dependent development, that the Settlement Capacity Audit be amended to more adequately '*highlight infrastructural requirements*' and '*specify enabling infrastructure*' for transport as required under the Section 28 Guidelines. This should consider all transport modes and in the case of Carrick-on-Shannon should be informed by the LTP for the town.

Chief Executive's Response:

The Settlement Capacity Audit was prepared to help to identify the ability of settlements to accommodate the necessary increased residential growth requirements as outlined in the NPF Revision. This assessment included the availability of suitable residential lands and supporting infrastructure. The Council will build on this baseline information when undertaking the LCDP 23-29 Review and in full accordance with the provisions of the Guidelines. The Council will continue to liaise with developers and their design teams at Pre-planning and Planning Application stages to ensure that active travel infrastructure (footpaths and/or cycle tracks) is implemented with regard to their proposed residential developments.

As outlined in Chief Executive Recommendation No.1, the Council has committed to integrate the LTP for Carrick-on-Shannon into the LCDP 23-29. The Active Travel Section of the Council will continue to review the requirements for active travel and public transport in the county.

Chief Executive's Recommendation:

See Chief Executive Recommendation No. 1.

3. Carrick-On-Shannon

A Local Transport Plan (LTP) for Carrick-on-Shannon was published along with the Joint Local Area Plan (JLAP) and informed Chapter 6 '*Movement and Transport*' of the JLAP.

The submission refers to refers to RPO 6.2.8 of the *'Regional Spatial and Economic Strategy 2020-2032'*, for the Northern and Western Region and recommends that consideration is given to including the full range of transport Objectives for Carrick-on-Shannon, as set out in the JLAP and LTP, in the Development Plan as part of the Variation.

Recommendation

The NTA recommend, in the interests of integration between land use and transport planning and, in order to align with RPO 6.2.8, that consideration is given to including the transport Objectives for Carrick-On-Shannon, as set out in the LAP and LTP, in the Development Plan as part of the Variation.

Chief Executive's Response:

As highlighted in the response to the OPR submission it is accepted that the LCDP 23-29 would benefit from the inclusion of the LTP which would further incorporate the measures proposed in the LTP.

Chief Executive's Recommendation:

See Chief Executive Recommendation No. 1.

Submission Reference Number:	VAR SUB 1-10
Submitted by:	An Taisce (The National Trust for Ireland)

Summary of Submission:

While the submission acknowledges that the need to provide housing and associated infrastructure is urgent, zoning for residential development purposes should not compromise the needs of biodiversity conservation and restoration, the achievement of compact settlement objectives, or the need to avoid zoning in flood risk areas.

The detailed submission is set out under a number of headings in respect of the following:

- Biodiversity Policy and Legal Context
- Community and Social Infrastructure
- Flood Risk
- Heritage
- SEA Monitoring

1. Biodiversity Policy and Legal Context

The requirement of Article 10 of the Habitats Directive is highlighted which seeks to preserve stepping stones and ecological corridors including nature conservation sites (other than European sites), habitat areas and species' locations.

Additional '*New Residential*' zonings should not further fragment the biodiversity habitats.

Full alignment with the County Leitrim Biodiversity Action Plan 2026-2031 should be demonstrated as a preliminary matter to ensure the absence of conflicting objectives and actions between the implementation of this Plan and the ambitious Housing Growth Requirements.

Sites of ecological significance should also be taken into consideration and the need for buffer zones between zoned lands and ecological areas should be considered.

The proposed activation of residential sites should also consider the requirements of adherence to the Habitats Directive, Water Framework Directive, Birds Directive, Floods Directive, etc.

Section 59(B) of the Wildlife (Amendment) Act 2023 and Section 21(2)(f) of the Planning and Development Act (PDA) 2024 should apply to the Council's forward planning decision-making function when assessing proposed rezonings.

Close consideration should also be given to Section 50 of the Planning and Development Act (PDA) 2024 (as commenced on 31 December 2025) which seeks the protection of trees and other significant ecological features within Planning Authority strategies, in accordance with the EU Biodiversity Strategy and NBAP.

Any change of land-use from a biodiversity rich site to one which would facilitate residential development requires assessment against the biodiversity objectives contained in the LCDP 23-29 to ensure that biodiversity interests are balanced with housing need.

Compact settlement guidance and objectives with regard to prioritising brownfield sites rather than greenfield sites needs to be considered.

2. Community and Social Infrastructure

Proportional consideration is given to the need for social and community infrastructure zoning provision to cater to the needs of future residents. A *Social and Community Infrastructure Assessment* should be carried out to determine the sufficiency of existing community infrastructure to meet the extra demand generated by additional residential zonings. Greater utilisation of '*Mixed Use'* zoning allocation should be considered to incentivise the integration of compact housing, biodiversity-friendly urban greening and open spaces, and social/community infrastructure. A High Court ruling, *Jones v South Dublin County Council [2024]*, is cited in support of this.

The concept of the '*15-minute city*' should be drawn upon to provide better designed and higher density urban areas. Compact settlement would also reduce development pressures upon sites of biodiversity significance. The submission seeks full alignment of the Development Plan with the Compact Settlement Guidelines (2024).

It is submitted that the Variation should include a requirement that all new residential development in urban and built-up areas be no more than a 15-minute walking distance from basic services and infrastructure.

In support of this the submission recommends that the Variation incorporates the test standards for new housing as outline in the *National Spatial Strategy 2002.*

Flood Risk

It should be ensured that a robust Strategic Flood Risk Assessment is conducted to inform proposed rezoning allocation to ensure the absence of future development in flood risk areas. Proposed zonings should also take future climate change flooding scenarios into account given projected increases in frequency and intensity of weather events of this nature. Sustainable Urban Drainage Solutions (SuDS) and nature-based management of rainwater should also be factored into Development Plan variations.

Article 7 of the Floods Directive is cited, and its requirements should be demonstrated as part of the zoning process.

Heritage

Proposed additional residential zoning activation should consider potential impacts upon National Monuments, associated archaeological sub-surface features which may require testing, preservation and/or excavation, Protected Structures (including their curtilage) and buildings listed on the National Inventory of Architectural Heritage (NIAH).

SEA Monitoring

The compliance of the provided SEA Environmental Report with the requirements of the SEA Directive needs to be assessed and validated. The SEA needs to identify, address and make concrete proposals for mitigation of climate impacts, reversal of biodiversity loss, deterioration in quality of life and general resource management sustainability to meet quality of life and wellbeing objectives.

The submission sets out the provisions of Article 10 of the SEA Directive and how it is to be interpreted. An Taisce has previously made a formal legal complaint to the European Commission regarding the systemic failures in Ireland to comply with Article 10 of the Directive.

Ongoing monitoring would contribute significantly to the general availability of environmental and ecological data in Ireland.

The submission highlights that it is a legal requirement that monitoring and reporting of environmental impacts be carried out over the lifetime of the plan and that remedial actions be taken where unforeseen negative impacts are identified. Table 10.1 of the SEA Environmental Report should be expanded to include NHAs/pNHAs, nature reserves and locally important biodiversity sites.

Chief Executive's Response:

It is considered that the submission from an Taisce is generic in nature and does not actually address any particular item with the proposed Variation or to the work undertaken in bringing the proposed Variation to this stage, including supporting social infrastructure audits and environmental assessments.

Strategic Environmental Assessment (SEA) has been undertaken on the existing Plan and on the proposed Variation in compliance with the SEA Directive and transposing Regulations. The SEA combined with the Plan and Variation preparation processes have facilitated the integration of a wide range of environmental considerations into the Plan and proposed Variation, including those relating to some of the comments included. The SEA Environmental Reports detail the findings of the assessments, including mitigation measures (from both the existing Plan and the proposed Variation) that lower tiers of decision-making will be required to comply with. Lower tier plans and projects will be subject to their own environmental assessment processes as relevant.

Relevant stages of Appropriate Assessment (AA) have also been undertaken on the Plan and Proposed Variation in compliance with the Habitats Directive and transposing Regulations. The AA for the Plan has facilitated the integration of European site considerations into the Plan.

Strategic Flood Risk Assessment (SFRA) too has been undertaken on both the Plan and the proposed Variation in compliance with the Flood Risk Management Guidelines. Flood risk management considerations have been integrated into both the Plan and the proposed Variation.

Various existing County Development Plan and proposed Variation measures already contribute towards the appropriate protection and management of the parts of the environment that are subject to the comments in the submission. Future applications for development must comply with these measures.

Appropriate monitoring measures and associated information are cited in Section 10 of the SEA Environmental Report. When the County Development Plan is being reviewed, information relating to monitoring programmes will be considered and will inform the SEA and the review. The Guidance from the EPA on SEA Monitoring has been taken into account in preparing the monitoring section for the SEA ER. Table 10.1 of the SEA Environmental Report will be updated as proposed. The inclusion of these additional references is not considered by the Planning Authority to amount to a Material Alteration of the proposed Variation, and it is recommended that they are included prior to the Variation being made.

Chief Executive's Recommendation:

No change recommended.

Submission Reference Number:	VAR SUB 1-11
Submitted by:	Fermanagh and Omagh District Council

Summary of Submission:

The submission welcomes the opportunity to engage in this consultation process and has no comments to make. The submission welcomes continued engagement with Leitrim County Council on cross-border planning and environmental matters of mutual interest.

Chief Executive's Response:

The submission is noted and welcomed.

Chief Executive's Recommendation:

No Change Recommended.

Submission Reference Number:	VAR SUB 1-18
Submitted by:	Office of Public Works (OPW)

Summary of Submission:

The submission welcomes the opportunity to comment on the proposed Variation and is made specifically concerning flood risk management.

The OPW welcomes the acknowledgement of the *Guidelines on the Planning System and Flood Risk Management* (DECLG/OPW, 2009), and the preparation of a Strategic Flood Risk assessment (SFRA).

Nature-based Solutions and SuDS

The preparation of development plans should take account of the opportunities for nature-based solutions to reduce runoff and provide other benefits such as to water quality, biodiversity, etc. Leitrim County Council should refer to The Best Practice Interim Guidance Document '*Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas'*, as well as the Guidance Document for Planners, Developers and Developer Agents '*Implementation of Urban Nature-based Solutions'* for further guidance. The Guidelines recommend that the Strategic Flood Risk Assessment provide guidance on the likely applicability of different SuDS techniques.

Map Review Programme

Flood Mapping produced under the National CFRAM Programme is currently under review at Mohill and is due to be published in the coming months. It is requested that the possible change in mapping in Mohill is noted.

Proposed Amendment No. 29

Amendment no. 29 proposes rezoning lands at Drummagh in Carrick-on-Shannon from '*Agriculture'* to '*New Residential'*. EPA flow network data indicates a possible watercourse passing adjacent to the lands. The OPW does not have flood extents associated with this potential source of risk. Leitrim County Council should review if a stage 3 flood risk assessment is required to inform the land use zonings and the SFRA. An evaluation of site-specific flood risk assessments may also assist with establishing flood zones.

Consideration of Climate Change Impacts

Table 1.1 in section 1.2 of the SFRA notes existing County Development Plan Flood Risk Management measures. Reference is made to 2009 guidance which has been superseded. It should be noted that the latest Flood Risk Management Climate Change Sectoral Adaptation Plan was published in 2025.

With regard to the proposed amendment to Section 9.8 'Flood Risk Management', It may be beneficial if the zoning boundaries were amended to reflect the restrictions on development, or if this requirement were strengthened by inclusion as a policy objective.

Chief Executive's Response:

The contents of the submission are noted. Comments relating to Nature-based Solutions and SuDS are noted and it is considered that relevant provisions have already been integrated into the existing LCDP 23-29.

With regard to mapping review in Mohill, any updates to mapping will be taken into account at future stages of decision making. They are not available presently to inform this process.

With regard to Proposed Amendment No. 29, the watercourse that was alluded to was considered as part of the Sustainable Flood Risk Assessment (SFRA) undertaken. It was determined that Proposed Amendment No. 29 is situated within Flood Zone C – therefore Stage 3 SFRA was not required. The site is on elevated ground rising away from the watercourse, approximately 20 m away from the watercourse. When proposing lands to be zoned, Leitrim County Council will continue to implement best practice as advocated by "*The Planning System and Flood Risk Management Guidelines for Planning Authorities* (2009)". This matter has already been considered in the submission from the OPR.

The comments relating to the latest Flood Risk Management Climate Change Sectoral Adaptation Plan, published in 2025 are noted and the correct text will be included in the Final SFRA report. The inclusion of these additional references are not considered by the Planning Authority to amount to a Material Alteration of the proposed Variation and it is recommended that they are included prior to the Variation being made.

Chief Executive's Recommendation:

No change recommended.

Submission Reference Number:	VAR SUB 1-20
Submitted by:	Electricity Supply Board (ESB)

Summary of Submission:

The submission welcomes the opportunity to make a submission to proposed Variation No. 1 of the LCDP 23-29.

Overview of ESB Strategy

The submission outlines that ESB are embracing new technologies and investing in sustainable energy solutions with an objective to develop and connect renewables to decarbonize the electricity system by 2040. ESB's progress towards carbon net zero operations is consistent with the NPF and RSES for the Northern and Western Region.

ESB Networks

The submission outlines how ESB are committed to expanding the electricity network across Ireland and notes physical upgrades as well as smart, flexible and digitally enabled solutions for future growth.

Energy Infrastructure – Planning Policy

The submission also outlines relevant planning policy while noting that ESB Networks' PR6 Business Plan proposes a €13.4 billion programme.

Energy Infrastructure - Transmission and Distribution

ESB is actively monitoring and assessing electricity network capacity in Co. Leitrim to ensure it can support current and future residential, commercial, and industrial growth. The submission emphasises the need for early coordination with Leitrim County Council to zone and secure suitable sites for essential electricity infrastructure. The submission also outlines the importance of early engagement on public infrastructure projects for cost effective delivery and minimal disruption.

ESB remains committed to proactive engagement with Leitrim County Council as revised housing targets are integrated into the County Development Plan. In order to address electricity network capacity constraints in the county, the submission outlines key projects to strengthen network resilience and accommodate future demand.

Energy Infrastructure – Medium and Low Voltage Network

ESB Networks has undertaken a comprehensive review of the Medium and Low Voltage network throughout County Leitrim which has identified areas where additional MV/LV substations and upgrades to existing substations are required. ESB requests that Leitrim County Council support the recommended energy infrastructure developments set out in the submission, consistent with the following Policy ENI POL 4 of the Leitrim County Development Plan.

Conclusion

It is requested that due consideration is given to the issues raised in the submission and in particular:

- Safeguarding the long-term operational requirements of ESB's existing network

- A proactive, collaborative partnership between Leitrim County Council and ESB to identify, zone, and secure suitable sites for critical infrastructure
- Revised housing growth requirements must be supported by timely and coordinated investment in electricity infrastructure
- Ensuring that public utilities are permissible under all zoning objectives
- Early engagement with ESB in the planning and design of roads, public realm works, and greenway
- Continued investment in electricity infrastructure in County Leitrim is a prerequisite for achieving national objectives

Chief Executive's Response:

The submission from ESB is noted. Leitrim County Council will continue to work with the ESB and welcome the engagement and future collaboration with the ESB on key infrastructure projects in the county. The Local Authority will coordinate closely with the ESB to identify suitable sites for delivery of key infrastructure and also will endeavour to address constraints in the network in the future. The submission refers to specific projects in Leitrim, and it is noted that there is a supporting policy in the County Development Plan in relation to Electricity Infrastructure, Climate and Renewables.

Leitrim County Council welcome the commitment to continue to invest in the network and any future relevant consultation will include early engagement with ESB.

Chief Executive's Recommendation:

No change Recommended.

Submission Reference Number:	VAR SUB 1-21
Submitted by:	Uisce Éireann

Summary of Submission:

The submission welcomes the opportunity to make a submission to proposed Variation No. 1 of the LCDP 23-29 and Uisce Éireann (UÉ) commits to continue to engage with Leitrim County Council as the development plan process progresses.

The submission is structured in two sections:

1. General overall comments in relation to Water and Wastewater Services, Developer-Led Infrastructure and suggested changes to the Zoning Matrix
2. Comments in relation to the Proposed Amendments.

1. General Comments

Water and Wastewater Services

Updated Wastewater and Water Capacity Registers were issued in April 2026 giving an update on the available capacity in each settlement with respect to currently available water and wastewater treatment capacity. The additional capacity created by a capital investment has been considered in the latest Registers where a project is planned for completion within the next Capital Investment Plan period (2025-2029).

UÉ supports development in smaller settlements through the Small Towns and Villages Growth Programme which is focused on providing for growth in areas already served by UÉ infrastructure where current or future capacity deficits have been identified.

Water Services Capacity Update

Carrick-on-Shannon

It is anticipated that ongoing upgrade works and leakage reduction activities will provide capacity to accommodate some of the targeted growth. A further upgrade at Carrick-on-Shannon Water treatment Plant is planned, design for this upgrade will be commenced in the Investment Plan period (2025-2029), with construction expected to be completed in the subsequent investment period (2030-2035). Until this upgrade is completed, connection applications will be considered on an individual basis considering their specific demand requirements, and UÉ will prioritise new connections for water supply for domestic properties to support housing needs across the area.

Ballinamore

Works have been completed to improve plant performance and compliance with environmental standards at Ballinamore Wastewater Treatment Plant. The level of available capacity may need to be revisited should a significant increase in overall demand for water services be experienced.

Carrigallen

There is an upgrade project underway, currently at Stage 2 under the Small Towns and Villages Growth Programme, to increase capacity at Carrigallen Wastewater Treatment Plant.

Developer-Led Infrastructure

Uisce Éireann has developed a Guidance Document, *Technical Standard for Nature Based Solutions and Minimum Requirements for Non-Nature Based Solutions*.

Zoning Matrices

UÉ requests that public utilities and public services is a land use category in the zoning matrix and that these uses are '*permissible*' or '*open for consideration*' in all zones. Suggested Zoning Matrix definitions are provided to support this request.

2. Response to Proposed Amendments as indicated

The submission provides comments on specific amendments included in the proposed Variation. The reference number of the Proposed Amendment is given below with the relevant comments.

1. No comment
2. No comment
3. Noted
4. Noted
5. Noted. The inclusion of the new housing yield is welcomed. Both Leitrim Village and Carrigallen have no capacity as outlined in the Capacity Registers.
6. No comment
7. No comment
8. It is requested that the *Land Use Zoning Objectives* and associated *Matrix* for Carrick-on-Shannon are amended to ensure sufficient provision is made to allow for the necessary delivery of water services infrastructure. The submission also requests that public utilities and public services is a land use category in the zoning matrix and that these uses are '*permissible*' or '*open for consideration*' in all zones.
9. 10, 11, 12, 13, 14 – No Comment
15. This proposed amendment includes provision for an increase in quantum of '*New Residential*' zoning (2.78ha) and '*Mixed Use*' zoning (0.66ha) in Ballinamore. At present, there is insufficient treatment capacity at the wastewater treatment plant to cater for the potential additional demand, should all lands be developed at expected densities within the lifetime of the development plan.
16. 17, 18, 19, 38 (Manorhamilton) - the proposed amendments include provision for 13.38ha of '*Enterprise and Employment*' lands and 2.93ha additional '*New Residential*' lands. At present, there is insufficient treatment capacity at the wastewater treatment plant to cater for the potential additional demand, depending on the specific load requirements of developments in these lands should all lands be developed at expected densities within the lifetime of the development plan. The proposed enterprise and employment lands fall outside the agglomeration boundary of the town. A long extension and potential upsizing of the network maybe required.
20. Noted
21. Noted

22. Noted
23. No comment
24. No comment
25. Mohill - Noted. Should all lands be developed at expected densities within the lifetime of the development plan constraints in available treatment capacity (water and wastewater) maybe experienced.
26. – 45 Noted.

Proposed Variation no. 1 Settlement Capacity Report

UÉ welcomes ongoing engagement with the Planning Department in relation to serviceability of proposed newly zoned lands and the details in the Settlement Capacity Report are noted.

Should all residential lands be brought forward for development within the lifetime of the development plan, there could be demand for treatment capacity which exceeds the available headroom. This is of note in Ballinamore, Manorhamilton and Carrigallen.

In settlements with existing constraints the available capacity is indicative only and is subject to change. The level of available capacity for water supply and wastewater treatment may need to be revisited should a significant increase in overall demand for water services be experienced.

Carrick-on-Shannon

- Site ID 1 and 2 - both sites fall outside the existing agglomeration boundary and extensions to network may be required.
- Side ID 3 and 4 – additional information required relating to the status of the sewer network, extensions may be required.
- Site ID 5 – extensions and upgrade to network may be required
- Site ID 6 – extensions and confirmation of network location may be required

Ballinamore

- Site ID 1 – outside the agglomeration boundary and the location and status of the network needs to be confirmed
- Site ID 2 - location and status of the network needs to be confirmed

Manorhamilton

- See general comment in relation to headroom available

Dromahair

- No Comment

Drumshanbo

- Site ID 1 and 2 - GIS data is limited and further investigations are required to confirm sewer location and potential capacity

Mohill

- Existing constraints at the Wastewater Treatment plant which may limit capacity available for connections

Kinlough

- No Comment

Dromod

- Site ID 2 - GIS data is limited and further investigations are required to confirm sewer location and potential capacity for new connections

Carrigallen

- See general comment in relation to headroom available

Environmental Reports

The contents of this submission should be taken account of in the Environmental Reports.

Chief Executive's Response:

The inclusion of the upgrade at the Carrick-on-Shannon Water treatment Plant in the Investment Plan period (2025-2029) is welcomed, however the capacity issues relating to the treatment plant and its impact on potential development proposals in south Leitrim is concerning.

It is further noted that the project to upgrade the Carrigallen Wastewater Treatment Plant is currently at Stage 2 under the Small Towns and Villages Growth Programme, yet it is recognised that it is unlikely that this project will be complete during the lifetime of this Plan.

With regard to the land use categories, Table 6.5 of the LCDP 23-29 outlines the land use zoning matrix for varying land use classes. In this table "*Public Utility/Infrastructure*" is permitted in principle across all land use zoning objectives. Likewise in the land use zoning matrix for Carrick-on-Shannon which is proposed to be included in the LCDP 23-29 as part of this variation, the land use class of "*Infrastructure and Utilities*" is either permitted in principle or open for consideration in all land use zoning objectives.

Comments relating to specific amendments are noted and it is contended that where minor extension to networks can be facilitated as part of development proposals and also the potential for developer led infrastructure subject to UÉ approval may also be used to service these lands.

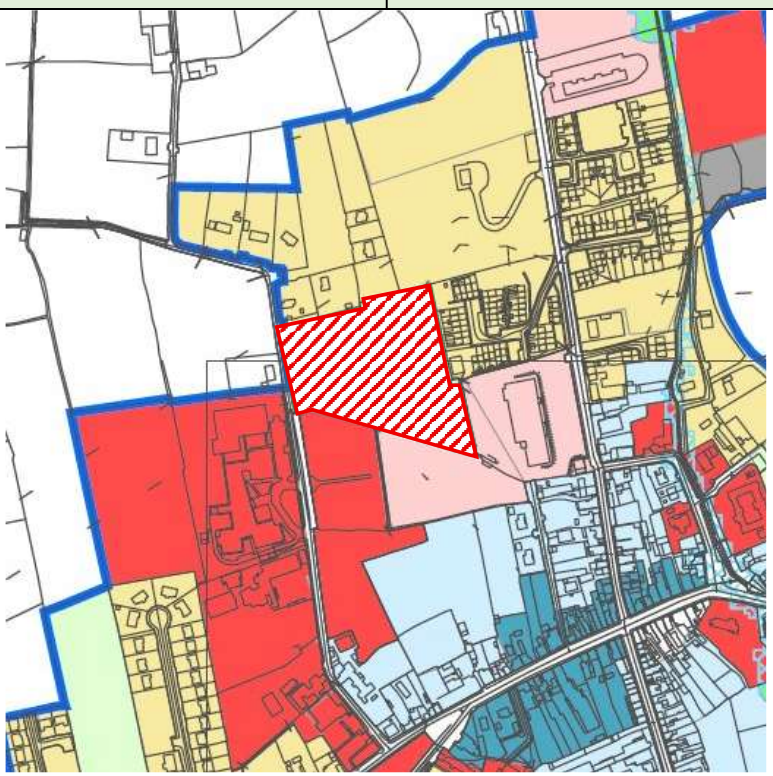
Chief Executive's Recommendation:

No change recommended.

Section 4

General Submissions

Submission Reference Number:	VAR SUB 1-1
Submitted by:	Catherine Cumiskey Hayes



Lands subject to submission:

Summary of Submission:

The submission relates to approximately 2.54 Ha of land in the townland of Cappagh, Mohill. The lands are currently zoned with a land use zoning objective of '*Agriculture*' in the LCDP 23-29. The submission requests that the lands be zoned for residential purposes.

Chief Executive's Response:

The Planning Authority notes the submission requesting the zoning of approximately 2.54 Ha of land in the townland of Cappagh, Mohill. The contents of the submission are noted and the ambition to develop the lands for residential purposes is welcomed. The lands are currently zoned with a land use zoning objective of '*Agriculture*' in the LCDP 23-29. The lands were previously identified as '*Mixed Use*' land use zoning objective in the 2015-2021 County Development Plan with no attempt to develop these lands for said purpose through the making of a planning application. The identified lands are currently within the settlement boundary for Mohill as defined in the LCDP 23-29 and as outlined on the map extract above.

Following the publication of the *National Planning Framework (NPF) First Revision* and the *National Planning Framework Implementation: Housing Growth Requirements Guidelines for Planning Authorities* issued under Section 28 of the Planning and Development Act 2000 (as amended), an assessment of all potential development lands in the county took place. These lands were assessed against a number of factors - the availability of key infrastructure such as road access, footpath access, public lighting, access to and capacity of

wastewater and water supply infrastructure, proximity to the town centre, the nature of the site with regard it constituting infill/brownfield, flood risk and site suitability. This assessment resulted a number of sites being identified as the most appropriate lands for residential development and these lands were included as part of the Proposed Variation.

The identification of lands for development over the lifetime of the LCDP 23-29 must ensure that the delivery of development is realistic relative to the capacity of the necessary infrastructure or the level of infrastructural investment that may be required and timeframe for providing same. The lands which are the subject of this submission were the subject of an infrastructural assessment and land use evaluation. On foot of this, it was considered that more suitable/appropriate lands exist within Mohill for residential development.

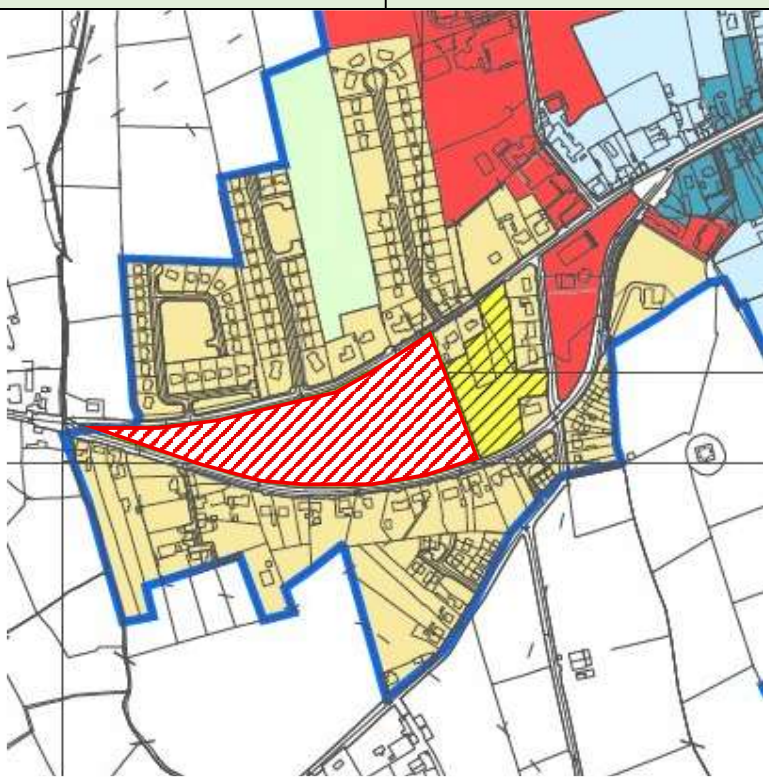
It should be noted that as part of the preparation of the next County Development Plan and the move to 10-year development plans, the land use zoning objectives of all settlements in the county will be reviewed. Again, at this stage, all potential lands will be assessed on their merits having regard to a comprehensive range of evidenced-based supporting documents including inter alia a Settlement Capacity Audit (SCA), a Social Infrastructure Audit, a Strategic Flood Risk Assessment and other environmental reports. The concerns of Uisce Éireann in relation to wastewater capacity and the limitations of South Leitrim Regional Water Supply Scheme are also of relevance in the consideration of additional lands for housing in Mohill.

It is considered that the lands would be more appropriately considered for zoning within the next County Development Plan review rather than through the current variation process. There are adequate lands now identified to provide for the anticipated needs of Mohill for the remainder of the LCDP.

Chief Executive's Recommendation:

No Change Recommended.

Submission Reference Number:	VAR SUB 1-3
Submitted by:	Arthur Dolan



Lands subject to submission:

Summary of Submission:

The submission relates to approximately 3.4 Ha of land in the townland of Shannagh, Mohill. The lands are currently zoned with a land use zoning objective of '*Agriculture*' in the LCDP 23-29, and it is proposed to change the land use zoning objective to '*New Residential'* as part of the Proposed Variation. The submission welcomes the proposal to change the land use zoning objective.

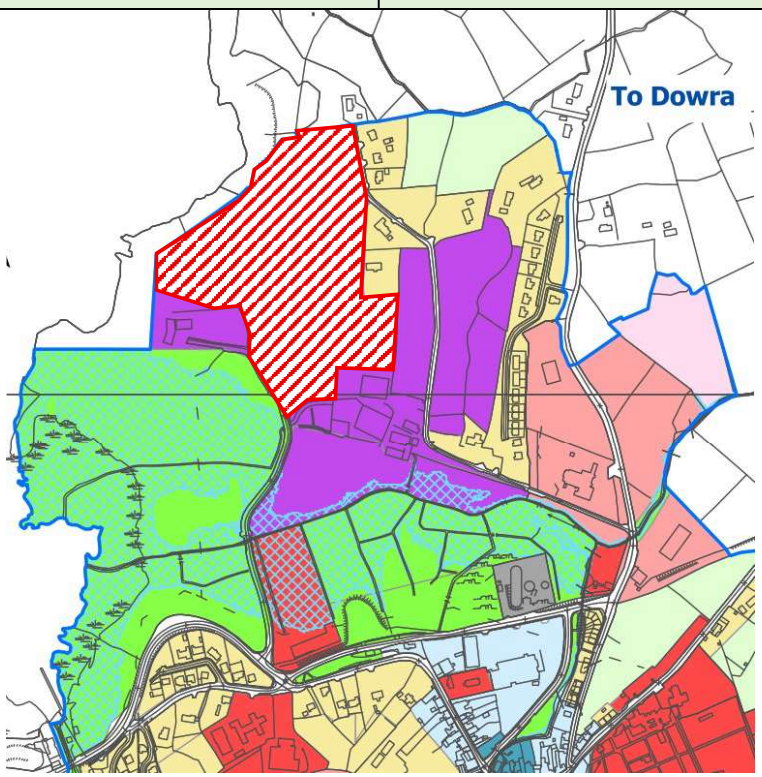
Chief Executive's Response:

The contents of the submission are noted and the ambition to develop the lands for residential purposes is welcomed.

Chief Executive's Recommendation:

No Change Recommended.

Submission Reference Number:	VAR SUB 1-7
Submitted by:	P&A Lakeside Investments Ltd.



Lands subject to submission:

Summary of Submission:

The submission relates to approximately 7.7 Ha of land in the townland of Corrachuill, Drumshanbo. The lands are currently zoned with a land use zoning objective of '*Tourism Related Development*' in the LCDP 23-29, and it is proposed to change the land use zoning objective to '*New Residential*' as part of the proposed variation. The former Lough Allen Hotel and Spa is located on part of the lands.

The original tourism-led model on the site consisted of hotel accommodation, spa and leisure facilities, ancillary hotel suites, holiday homes and tourism accommodation as well as associated roads, parking, landscaping and infrastructure. The submission outlines that this model is no longer viable from an operational and commercial perspective.

The proposed redevelopment of the site is outlined in particular the conversion of existing hotel suites into residential apartments, renovating and regularising the 6 no. existing dwellings on site as well as potential for further residential development opportunities. A comprehensive justification for this change of land use zoning has been outlined in the submission.

Chief Executive's Response:

The Planning Authority notes the submission requesting the zoning of approximately 7.7 Ha of land in the townland of Corrachuill, Drumshanbo. The contents of the submission are noted and the ambition to develop

the lands for residential purposes is welcomed. The lands are currently zoned with a land use zoning objective of '*Tourism Related Development*' in the LCDP 23-29. The identified lands are currently within the settlement boundary for Drumshanbo as defined in the LCDP 23-29 and as outlined on the map extract above.

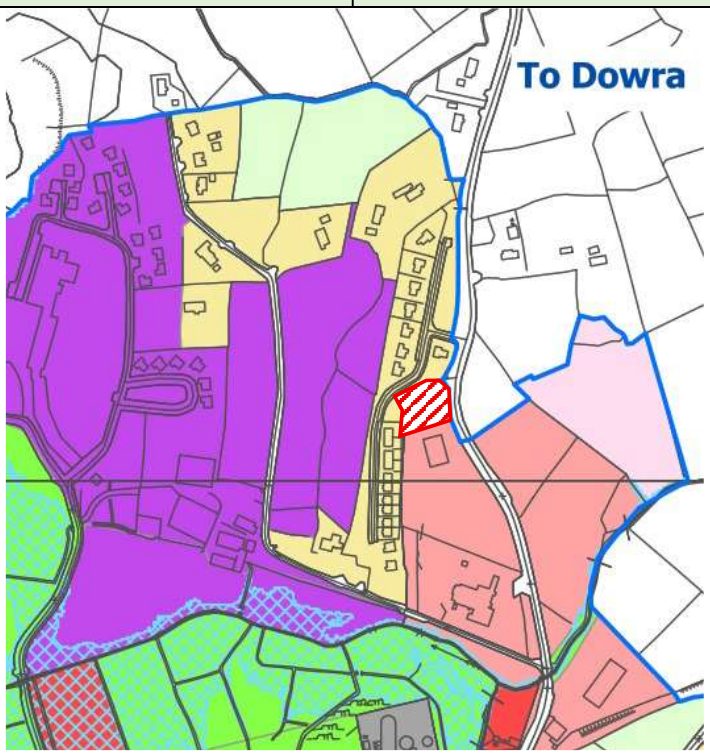
Following the publication of the *National Planning Framework (NPF) First Revision* and the *National Planning Framework Implementation: Housing Growth Requirements Guidelines for Planning Authorities* issued under Section 28 of the Planning and Development Act 2000 (as amended), an assessment of all potential development lands in the county took place. These lands were assessed against a number of factors - the availability of key infrastructure such as road access, footpath access, public lighting, access to and capacity of wastewater and water supply infrastructure, proximity to the town centre, the nature of the site with regard it constituting infill/brownfield, flood risk and site suitability. This assessment resulted a number of sites being identified as the most appropriate lands for residential development and these lands were included as part of the proposed variation.

The identification of lands for development over the lifetime of the LCDP 23-29 must ensure that the delivery of development is realistic relative to the capacity of the necessary infrastructure or the level of infrastructural investment that may be required and timeframe for providing same. The lands which are the subject of this submission were the subject of an infrastructural assessment and land use evaluation. The proposal to change the land use zoning objective on these lands will allow for the repurposing of this area while reducing vacancy, promoting regeneration and reducing pressure for greenfield development and as a result, it is considered appropriate to change the land use objective on these lands to '*New Residential*'. This will also allow favourable consideration of the much publicised proposal to convert the former hotel and spa / leisure centre into a nursing home with 'Retirement / Nursing Homes' indicated in the Zoning Matrix as being '*acceptable in principle*'.

Chief Executive's Recommendation:

CE Recommendation no. 6. To change the land use objective of lands outlined in Submission VAR 1-7 from '*Tourism Related Development*' to '*New Residential*'.

Submission Reference Number:	VAR SUB 1-8
Submitted by:	Shane McGovern



Lands subject to submission:

Summary of Submission:

The submission relates to approximately 0.24 Ha of land in the townland of Corlough, Drumshanbo. The lands are currently zoned with a land use zoning objective of '*Enterprise and Employment'* in the LCDP 23-29, and it is proposed to change the land use zoning objective to '*New Residential'* as part of the proposed variation.

The submission outlines that there are no known natural heritage, built heritage or flood risk constraints associated with the site. There are established pedestrian connections from the site to the town centre, and the site is bounded to the north and west by existing residential development.

Chief Executive's Response:

The Planning Authority notes the submission requesting the zoning of approximately 0.2 Ha of land in the townland of Corlough, Drumshanbo. The contents of the submission are noted and the ambition to develop the lands for residential purposes is welcomed. The lands are currently zoned with a land use zoning objective of '*Enterprise and Employment*' in the LCDP 23-29. The identified lands are currently within the settlement boundary for Drumshanbo as defined in the LCDP 23-29 and as outlined on the map extract above.

Following the publication of the *National Planning Framework (NPF) First Revision* and the *National Planning Framework Implementation: Housing Growth Requirements Guidelines for Planning Authorities* issued under Section 28 of the Planning and Development Act 2000 (as amended), an assessment of all potential development lands in the county took place. These lands were assessed against a number of factors - the

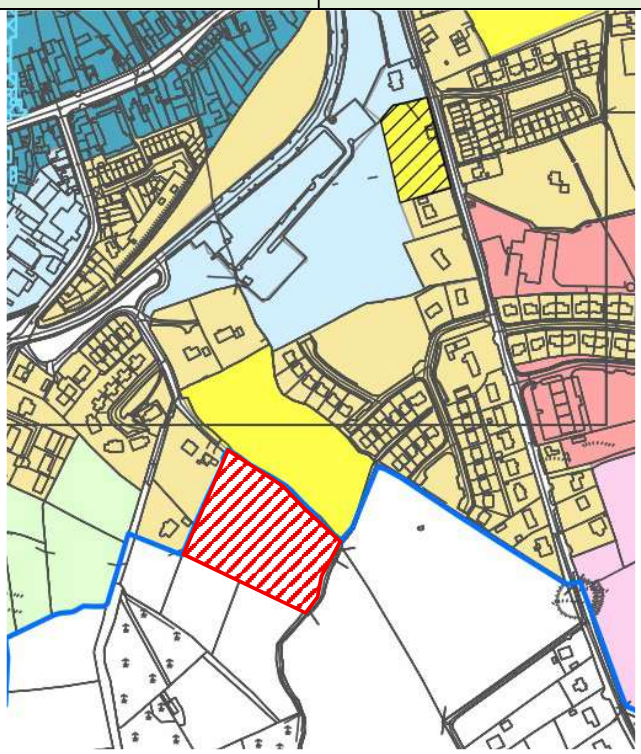
availability of key infrastructure such as road access, footpath access, public lighting, access to and capacity of wastewater and water supply infrastructure, proximity to the town centre, the nature of the site with regard it constituting infill/brownfield, flood risk and site suitability. This assessment resulted a number of sites being identified as the most appropriate lands for residential development and these lands were included as part of the proposed variation.

The identification of lands for development over the lifetime of the LCDP 23-29 must ensure that the delivery of development is realistic relative to the capacity of the necessary infrastructure or the level of infrastructural investment that may be required and timeframe for providing same. The lands which are the subject of this submission were the subject of an infrastructural assessment and land use evaluation. On foot of this and the limited scale of the lands in question, it is considered appropriate to change the land use objective on these lands to '*New Residential*'.

Chief Executive's Recommendation:

CE Recommendation no. 7. To change the land use objective of lands outlined in Submission VAR 1-8 from '*Enterprise and Employment*' to '*New Residential'*.

Submission Reference Number:	VAR SUB 1-13
Submitted by:	Brendan Sammon



Lands subject to submission:

Summary of Submission:

The submission relates to approximately 1.27 Ha of land in the townland of Tully, Ballinamore. The lands are currently outside the settlement boundary of Ballinamore as identified in the LCDP 23-29, and it is proposed to include these lands in the settlement boundary with a land use zoning objective of '*New Residential*' as part of the Proposed Variation.

While the lands are currently outside the development envelope, they adjoin lands proposed by Leitrim County Council for '*New Residential*' zoning under Proposed Amendment No. 35 of the proposed Variation.

It is contended in the submission that together with the lands adjacent, they are capable of being serviced within the lifetime of the Plan or as part of a future development proposal. Their inclusion would support a coherent and plan-led residential zoning pattern at Tully and would assist in strengthening the effective residential land supply in Ballinamore.

The credentials of the landowner are outlined and the submission notes that the lands are capable of being activated within the plan period. It is submitted that the zoning of the subject lands would provide a logical and proportionate addition to the residential land supply at Tully but would also identify lands with a realistic prospect of contributing to housing delivery within the lifetime of the Plan.

The submission includes a comprehensive policy context for the lands as well as outlining the infrastructure provision at this location.

Chief Executive's Response:

The Planning Authority notes the submission requesting the zoning of approximately 1.27 Ha of land in the townland of Tully, Ballinamore. The contents of the submission are noted and the ambition to develop the lands for residential purposes is welcomed. The identified lands are currently outside the settlement boundary for Ballinamore as defined in the LCDP 23-29 and as outlined on the map extract above.

Following the publication of the *National Planning Framework (NPF) First Revision* and the *National Planning Framework Implementation: Housing Growth Requirements Guidelines for Planning Authorities* issued under Section 28 of the Planning and Development Act 2000 (as amended), an assessment of all potential development lands in the county took place. These lands were assessed against a number of factors - the availability of key infrastructure such as road access, footpath access, public lighting, access to and capacity of wastewater and water supply infrastructure, proximity to the town centre, the nature of the site with regard it constituting infill/brownfield, flood risk and site suitability. This assessment resulted a number of sites being identified as the most appropriate lands for residential development and these lands were included as part of the proposed variation.

The identification of lands for development over the lifetime of the LCDP 23-29 must ensure that the delivery of development is realistic relative to the capacity of the necessary infrastructure or the level of infrastructural investment that may be required and timeframe for providing same. The lands which are the subject of this submission were the subject of an infrastructural assessment and land use evaluation.

The submission received from Uisce Éireann (VAR SUB 1-21) outlines that there is limited headroom at the Wastewater Treatment Plant at this time. Accordingly, it would not be appropriate to exacerbate this with further zoning for the lifetime of this Plan. In addition, in reviewing the existing objectives for Ballinamore as part of the review of the previous County Development Plan 2015-2023, Tully Lane was not deemed of appropriate gradient and width to service additional residential zoned lands. Accordingly, an objective to develop a Local Distributor Road from the Willowfield Road connecting to Tully Lane and onwards to Distributor Road at Tesco was removed from the Plan.

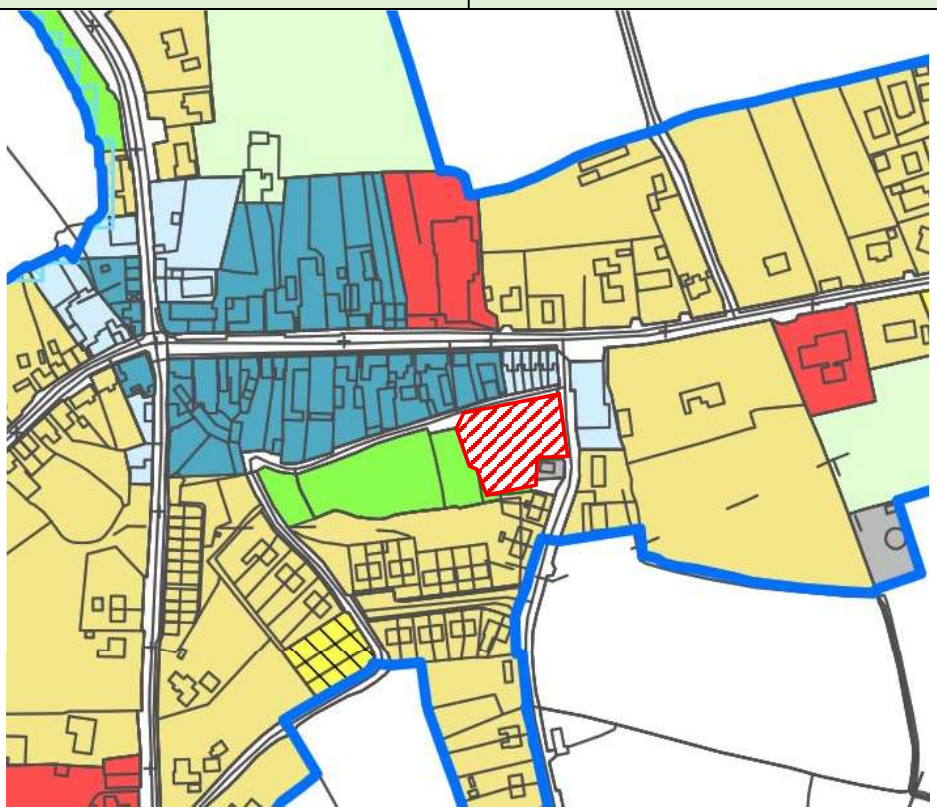
It should be noted that as part of the preparation of the next County Development Plan and the move to 10-year development plans, the land use zoning objectives of all settlements in the county will be reviewed. Again, at this stage, all potential lands will be assessed on their merits having regard to a comprehensive range of evidenced-based supporting documents including inter alia a Settlement Capacity Audit (SCA), a Social Infrastructure Audit, a Strategic Flood Risk Assessment and other environmental reports.

There are adequate lands now identified to provide for the anticipated needs of Ballinamore for the remainder of the LCDP. It is considered that the lands would be more appropriately considered for zoning within the next County Development Plan review rather than through the current variation process.

Chief Executive's Recommendation:

No change recommended.

Submission Reference Number:	VAR SUB 1-14
Submitted by:	John Reilly



Lands subject to submission:

Summary of Submission:

The submission relates to approximately 0.2 Ha of land in the townland of Clooncorick, Carrigallen. The lands are currently zoned with a land use zoning objective of '*Open Space and Amenity'* in the LCDP 23-29, and it is proposed to change the land use zoning objective to '*New Residential'* as part of the proposed variation. The lands were previously identified with '*Primary Residential (developed)*' and *'Residential Reserve/Support'* land use zoning objectives in the 2015-2021 County Development Plan.

Chief Executive's Response:

The Planning Authority notes the submission requesting the zoning of approximately 0.2 Ha of land in the townland of Clooncorick, Carrigallen. The identified lands are currently within the settlement boundary for Carrigallen as defined in the LCDP 23-29 and as outlined on the map extract above.

Following the publication of the *National Planning Framework (NPF) First Revision* and the *National Planning Framework Implementation: Housing Growth Requirements Guidelines for Planning Authorities* issued under Section 28 of the Planning and Development Act 2000 (as amended), an assessment of all potential development lands in the county took place. These lands were assessed against a number of factors - the availability of key infrastructure such as road access, footpath access, public lighting, access to and capacity of wastewater and water supply infrastructure, proximity to the town centre, the nature of the site with regard it

constituting infill/brownfield, flood risk and site suitability. This assessment resulted a number of sites being identified as the most appropriate lands for residential development and these lands were included as part of the proposed variation.

The identification of lands for development over the lifetime of the LCDP 23-29 must ensure that the delivery of development is realistic relative to the capacity of the necessary infrastructure or the level of infrastructural investment that may be required and timeframe for providing same. The lands which are the subject of this submission were the subject of an infrastructural assessment and land use evaluation.

The Wastewater Capacity Register issued in April, 2026 by Uisce Éireann outline the capacity for wastewater treatment and water supply in each of the settlements in the county. Carrigallen has been identified as having no capacity available (Red) in terms of wastewater treatment.

The submission received from Uisce Éireann (VAR SUB 1-21) outlines that there is an upgrade project underway to increase capacity at Carrigallen Wastewater Treatment Plant and this is currently at Stage 2 under the Small Towns and Villages Growth Programme.

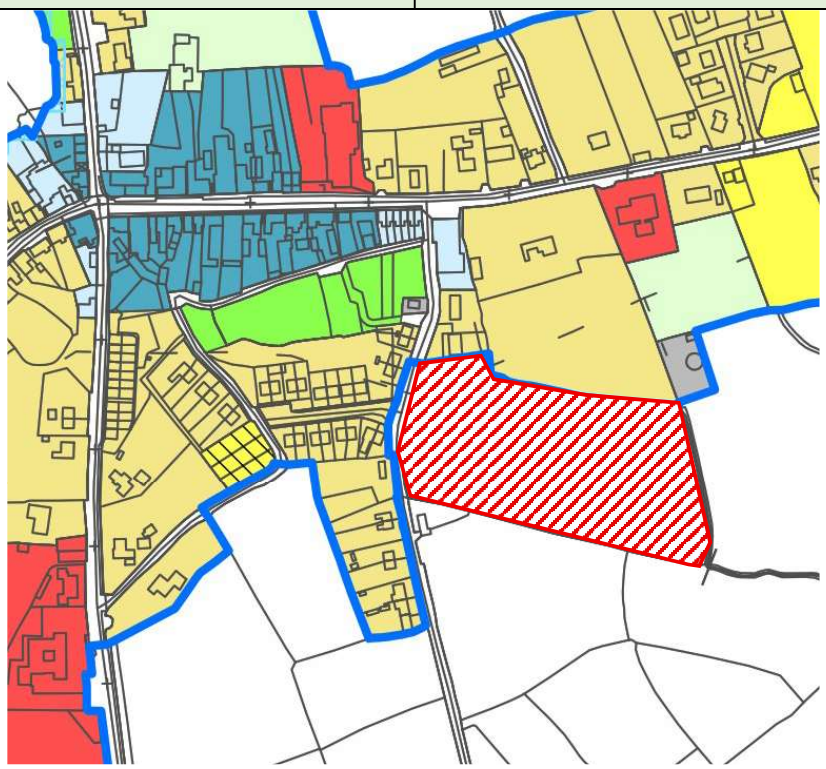
It should be noted that as part of the preparation of the next County Development Plan and the move to 10-year development plans, the land use zoning objectives of all settlements in the county will be reviewed. Again, at this stage, all potential lands will be assessed on their merits having regard to a comprehensive range of evidenced-based supporting documents including inter alia a Settlement Capacity Audit (SCA), a Social Infrastructure Audit, a Strategic Flood Risk Assessment and other environmental reports.

It is considered that the lands would be more appropriately considered for zoning within the next County Development Plan review rather than through the current variation process. The principle of the proposed development would also be questioned strongly by the Planning Authority. The general roads infrastructure at this location lacks any connecting footpath onto the Main Street whilst the lands zoned for '*Open Space and Amenity*' would allow for a park to be developed reinforcing the work to develop the former laneway as an amenity walkway. The current use of this area as a hard stand area associated with the adjoining commercial building is an authorised use and is the subject of an open and unresolved enforcement case.

Chief Executive's Recommendation:

No change recommended.

Submission Reference Number:	VAR SUB 1-15
Submitted by:	Gary Reilly



Lands subject to submission:

Summary of Submission:

The submission relates to approximately 1.95 Ha of land in the townland of Clooncorick, Carrigallen. The lands are currently outside the settlement boundary of Carrigallen as identified in the LCDP 23-29, and it is proposed to include these lands in the settlement boundary with a land use zoning objective of '*New Residential*' as part of the proposed variation.

Chief Executive's Response:

The Planning Authority notes the submission requesting the zoning of approximately 1.95 Ha of land in the townland of Clooncorick, Carrigallen. The identified lands are currently outside the settlement boundary for Carrigallen as defined in the LCDP 23-29 and as outlined on the map extract above. The lands were previously identified with a *'Residential Reserve/Support'* land use zoning objective in the 2015-2021 County Development Plan.

Following the publication of the *National Planning Framework (NPF) First Revision* and the *National Planning Framework Implementation: Housing Growth Requirements Guidelines for Planning Authorities* issued under Section 28 of the Planning and Development Act 2000 (as amended), an assessment of all potential development lands in the county took place. These lands were assessed against a number of factors - the availability of key infrastructure such as road access, footpath access, public lighting, access to and capacity of wastewater and water supply infrastructure, proximity to the town centre, the nature of the site with regard it

constituting infill/brownfield, flood risk and site suitability. This assessment resulted a number of sites being identified as the most appropriate lands for residential development and these lands were included as part of the proposed variation.

The identification of lands for development over the lifetime of the LCDP 23-29 must ensure that the delivery of development is realistic relative to the capacity of the necessary infrastructure or the level of infrastructural investment that may be required and timeframe for providing same. The lands which are the subject of this submission were the subject of an infrastructural assessment and land use evaluation.

The Wastewater Capacity Register issued in April, 2026 by Uisce Éireann outline the capacity for wastewater treatment and water supply in each of the settlements in the county. Carrigallen has been identified as having no capacity available (Red) in terms of wastewater treatment.

The submission received from Uisce Éireann (VAR SUB 1-21) outlines that there is an upgrade project underway to increase capacity at Carrigallen Wastewater Treatment Plant and this is currently at Stage 2 under the Small Towns and Villages Growth Programme.

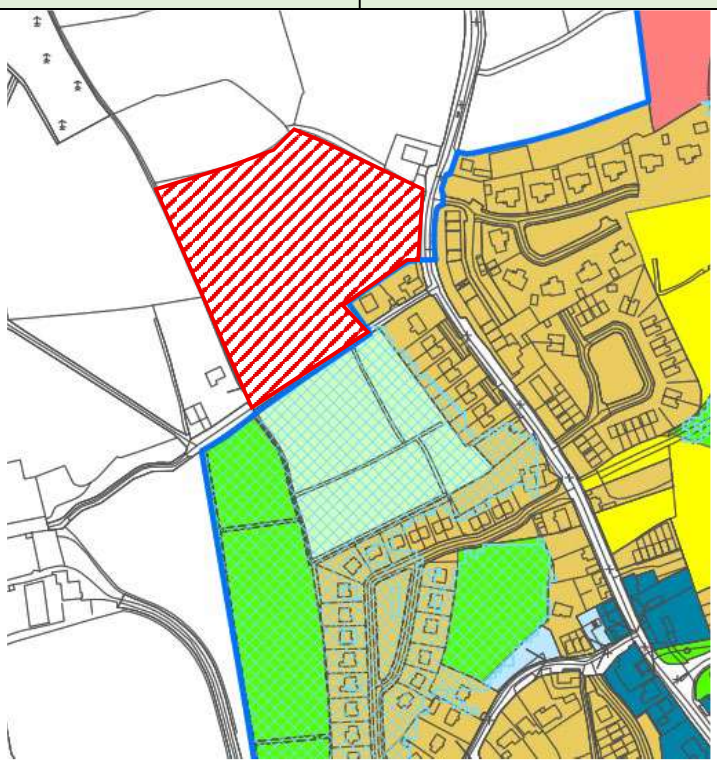
It should be noted that as part of the preparation of the next County Development Plan and the move to 10-year development plans, the land use zoning objectives of all settlements in the county will be reviewed. Again, at this stage, all potential lands will be assessed on their merits having regard to a comprehensive range of evidenced-based supporting documents including inter alia a Settlement Capacity Audit (SCA), a Social Infrastructure Audit, a Strategic Flood Risk Assessment and other environmental reports. The principle of the proposed development would also be questioned strongly by the Planning Authority. The general roads infrastructure at this location lack any connecting footpaths onto the Main Street

It is considered that the lands would be more appropriately considered for zoning within the next County Development Plan review rather than through the current variation process.

Chief Executive's Recommendation:

No change recommended.

Submission Reference Number:	VAR SUB 1-16
Submitted by:	Wesley Notley



Lands subject to submission:

Summary of Submission:

The submission relates to approximately 1.95 Ha of land in the townland of Drumod Beg, Dromod. The lands are currently outside the settlement boundary of Dromod as identified in the LCDP 23-29, and it is proposed to include these lands in the settlement boundary with a land use zoning objective of '*New Residential*' as part of the Proposed Variation. It is contended that the lands are not located within any flood plain.

Chief Executive's Response:

The Planning Authority notes the submission requesting the zoning of approximately 1.95 Ha of land in the townland of Drumod Beg, Dromod. The identified lands are currently outside the settlement boundary for Dromod as defined in the LCDP 23-29 and as outlined on the map extract above. The lands were previously identified with a *'Residential Reserve/Support'* land use zoning objective in the 2015-2021 County Development Plan.

Following the publication of the *National Planning Framework (NPF) First Revision* and the *National Planning Framework Implementation: Housing Growth Requirements Guidelines for Planning Authorities* issued under Section 28 of the Planning and Development Act 2000 (as amended), an assessment of all potential development lands in the county took place. These lands were assessed against a number of factors - the availability of key infrastructure such as road access, footpath access, public lighting, access to and capacity of wastewater and water supply infrastructure, proximity to the town centre, the nature of the site with regard it

constituting infill/brownfield, flood risk and site suitability. This assessment resulted a number of sites being identified as the most appropriate lands for residential development and these lands were included as part of the proposed variation.

The identification of lands for development over the lifetime of the LCDP 23-29 must ensure that the delivery of development is realistic relative to the capacity of the necessary infrastructure or the level of infrastructural investment that may be required and timeframe for providing same. The lands which are the subject of this submission were the subject of an infrastructural assessment and land use evaluation.

Notwithstanding the contention of the submission that the lands are not within flood risk areas, part of the lands are identified as being in flood risk areas as shown in the screenshot below from the maps of the area taken from www.floodinfo.ie.



Figure 2: Screenshot of lands from www.floodinfo.ie

The 2009 Ministerial Guidelines on Flood Risk Management, with which the Council must comply, require that SFRA is undertaken on the proposed Variation. The Guidelines require the delineation of Flood Risk Zones by the SFRA, which must be taken into account in the Plan's Land Use Zoning.

The Guidelines require that the Council and the SFRA consider quite significant return periods for predicted flood events when delineating Flood Zones;

- Flood Zone A – where the probability of flooding from rivers and the sea is highest (greater than 1% or 1 in 100 for river flooding); and
- Flood Zone B – where the probability of flooding from rivers and the sea is moderate (between 0.1% or 1 in 1000 and 1% or 1 in 100 for river flooding).

From the screenshot above, it is clear that part of the lands are located within Flood Zones A and B. Flood Zones A and B have implications for what land use zoning objectives are appropriate to particular sites – as outlined in the Ministerial Guidelines on Flood Risk Management. Residential development, for example, is considered a highly vulnerable use that would not be considered appropriate within Flood Zone A or B, unless a Justification Test was passed, which is not the case in this instance. On this basis, it is considered appropriate that this portion of the lands identified in this submission would not be zoned for new residential development.

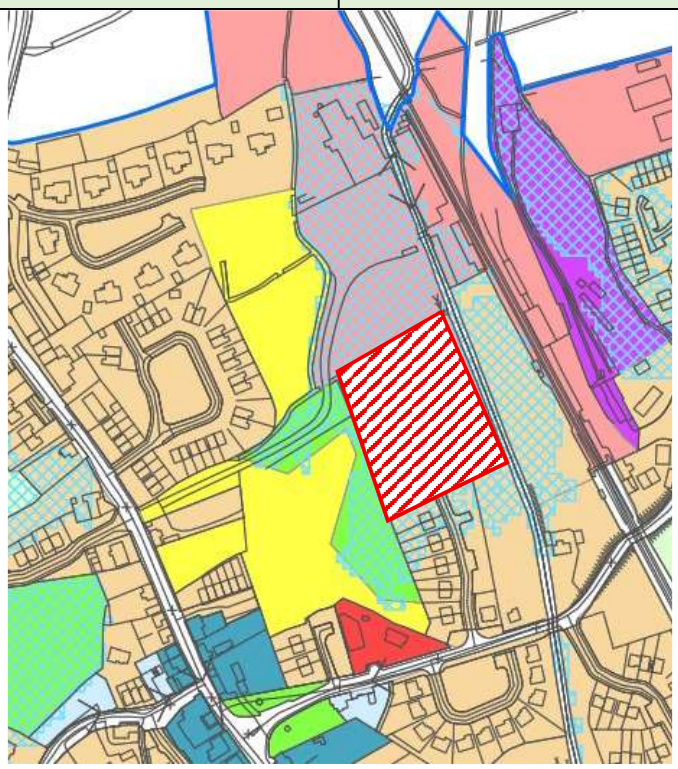
As regards the remainder of the lands, it should be noted that as part of the preparation of the next County Development Plan and the move to 10-year development plans, the land use zoning objectives of all settlements in the county will be reviewed. Again, at this stage, all potential lands will be assessed on their merits having regard to a comprehensive range of evidenced-based supporting documents including inter alia a Settlement Capacity Audit (SCA), a Social Infrastructure Audit, a Strategic Flood Risk Assessment and other environmental reports.

There are adequate lands now identified to provide for the anticipated needs of Dromod for the remainder of the LCDP. It is considered that the lands would be more appropriately considered for zoning within the next County Development Plan review rather than through the current variation process.

Chief Executive's Recommendation:

No change recommended.

Submission Reference Number:	VAR SUB 1-17
Submitted by:	Aaron O'Connor



Lands subject to submission:

Summary of Submission:

The submission relates to approximately 1.1 Ha of land in the townland of Drumod Beg, Dromod. The lands are currently zoned with a land use zoning objective of '*Open Space and Amenity'* in the LCDP 23-29, and it is proposed to change the land use zoning objective to '*New Residential'* as part of the Proposed Variation.

The lands were previously zoned under the 2015-2021 Development Plan and details relating to the planning history and previous permissions on the site have been submitted.

Chief Executive's Response:

The Planning Authority notes the submission requesting the zoning of approximately 1.01 Ha of land in the townland of Drumod Beg, Dromod. The identified lands are currently zoned with a land use zoning objective of '*Open Space and amenity'* as well as being identified as an area of '*Constrained Land Use'* in the LCDP 23-29 and as outlined on the map extract above. The lands were previously identified with a '*Enterprise and Employment'* land use zoning objective in the 2015-2021 County Development Plan.

Following the publication of the *National Planning Framework (NPF) First Revision* and the *National Planning Framework Implementation: Housing Growth Requirements Guidelines for Planning Authorities* issued under Section 28 of the Planning and Development Act 2000 (as amended), an assessment of all potential development lands in the county took place. These lands were assessed against a number of factors - the

availability of key infrastructure such as road access, footpath access, public lighting, access to and capacity of wastewater and water supply infrastructure, proximity to the town centre, the nature of the site with regard it constituting infill/brownfield, flood risk and site suitability. This assessment resulted a number of sites being identified as the most appropriate lands for residential development and these lands were included as part of the proposed variation.

The identification of lands for development over the lifetime of the LCDP 23-29 must ensure that the delivery of development is realistic relative to the capacity of the necessary infrastructure or the level of infrastructural investment that may be required and timeframe for providing same. The lands which are the subject of this submission were the subject of an infrastructural assessment and land use evaluation.

The 2009 Ministerial Guidelines on Flood Risk Management, with which the Council must comply, require that SFRA is undertaken on the proposed Variation. The Guidelines require the delineation of Flood Risk Zones by the SFRA, which must be taken into account in the Plan's Land Use Zoning.

The Guidelines require that the Council and the SFRA consider quite significant return periods for predicted flood events when delineating Flood Zones;

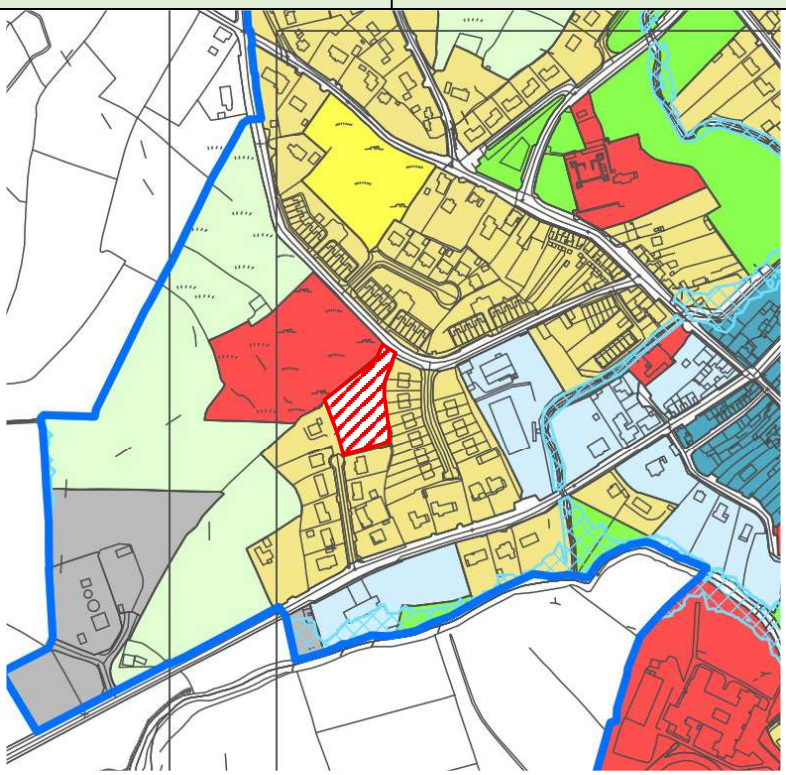
- Flood Zone A – where the probability of flooding from rivers and the sea is highest (greater than 1% or 1 in 100 for river flooding); and
- Flood Zone B – where the probability of flooding from rivers and the sea is moderate (between 0.1% or 1 in 1000 and 1% or 1 in 100 for river flooding).

Significant parts of these the lands are located within Flood Zones A and B. Flood Zones A and B have implications for what land use zoning objectives are appropriate to particular sites – as outlined in the Ministerial Guidelines on Flood Risk Management. Residential development, for example, is considered a highly vulnerable use that would not be considered appropriate within Flood Zone A or B, unless a Justification Test was passed, which is not the case in this instance. Owning to the *Constrained Land Use* nature of these lands, only compatible, less vulnerable land uses can be accommodated on these lands, therefore it is recommended that there is no change to the proposed Variation on foot of this submission.

Chief Executive's Recommendation:

No change recommended.

Submission Reference Number:	VAR SUB 1-19
Submitted by:	John McKenna



Lands subject to submission:

Summary of Submission:

The submission relates to approximately 0.4 Ha of land in the townland of Clooneen, Manorhamilton. The lands are currently zoned with a land use zoning objective of '*New Residential – Low Density'* in the LCDP 23-29, and it is proposed to change the land use zoning objective to '*New Residential'* as part of the Proposed Variation.

Chief Executive's Response:

The Planning Authority notes the submission requesting the zoning of approximately 0.4 Ha of land in the townland of Clooneen, Manorhamilton. The lands are currently zoned with a land use zoning objective of '*New Residential – Low Density'* in the LCDP 23-29. The identified lands are currently within the settlement boundary for Manorhamilton as defined in the LCDP 23-29 and as outlined on the map extract above.

Following the publication of the *National Planning Framework (NPF) First Revision* and the *National Planning Framework Implementation: Housing Growth Requirements Guidelines for Planning Authorities* issued under Section 28 of the Planning and Development Act 2000 (as amended), an assessment of all potential development lands in the county took place. These lands were assessed against a number of factors - the availability of key infrastructure such as road access, footpath access, public lighting, access to and capacity of wastewater and water supply infrastructure, proximity to the town centre, the nature of the site with regard it constituting infill/brownfield, flood risk and site suitability. This assessment resulted a number of sites being

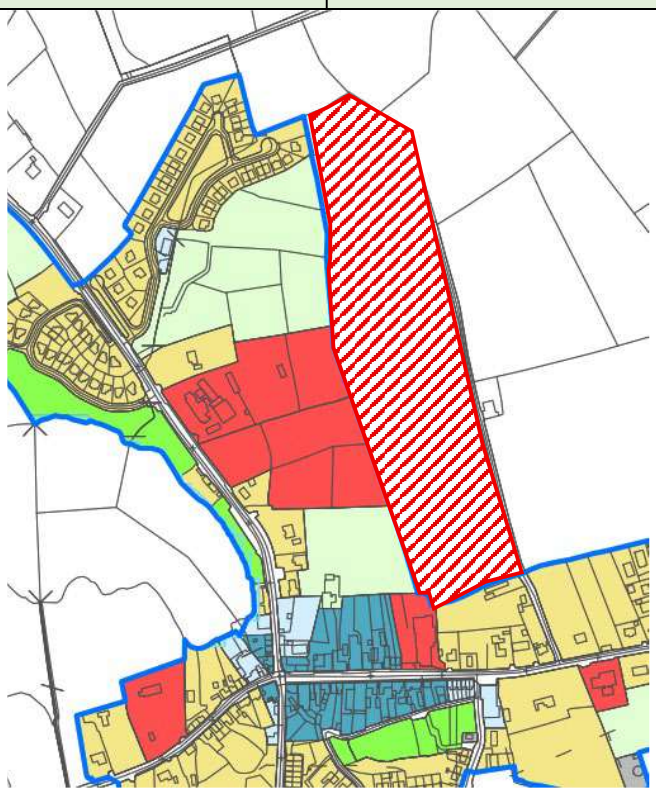
identified as the most appropriate lands for residential development and these lands were included as part of the proposed variation.

The identification of lands for development over the lifetime of the LCDP 23-29 must ensure that the delivery of development is realistic relative to the capacity of the necessary infrastructure or the level of infrastructural investment that may be required and timeframe for providing same. The lands which are the subject of this submission were the subject of an infrastructural assessment and land use evaluation. On foot of this, it is considered appropriate to change the land us objective on these lands to '*New Residential*'. However, the appropriateness of a proposed development will be required to adhere to the development management standards contained in LCDP 23-29 and with the proper planning and sustainable development of the area. The changing of the density designation does not change the Planning Authority's consideration of such matters through the planning application process.

Chief Executive's Recommendation:

Chief Executive's Recommendation No. 8: To change the land use objective of lands outlined in Submission VAR 1-19 from '*New Residential – Low Density'* to '*New Residential*'.

Submission Reference Number:	VAR SUB 1-22
Submitted by:	Donal Cadden



Lands subject to submission:

Summary of Submission:

The submission relates to approximately 7.65 Ha of land in the townland of Clooncorick, Carrigallen. The lands are currently outside the settlement boundary of Carrigallen as identified in the LCDP 23-29, and it is proposed to include these lands in the settlement boundary with a land use zoning objective of '*New Residential*' as part of the Proposed Variation.

Chief Executive's Response:

The Planning Authority notes the submission requesting the zoning of approximately 7.65 Ha of land in the townland of Clooncorick, Carrigallen. The identified lands are currently outside the settlement boundary for Carrigallen as defined in the LCDP 23-29 and as outlined on the map extract above. The lands were partially identified with a *'Residential Reserve/Support'* land use zoning objective in the 2015-2021 County Development Plan.

Following the publication of the *National Planning Framework (NPF) First Revision* and the *National Planning Framework Implementation: Housing Growth Requirements Guidelines for Planning Authorities* issued under Section 28 of the Planning and Development Act 2000 (as amended), an assessment of all potential development lands in the county took place. These lands were assessed against a number of factors - the availability of key infrastructure such as road access, footpath access, public lighting, access to and capacity of

wastewater and water supply infrastructure, proximity to the town centre, the nature of the site with regard it constituting infill/brownfield, flood risk and site suitability. This assessment resulted a number of sites being identified as the most appropriate lands for residential development and these lands were included as part of the proposed variation.

The identification of lands for development over the lifetime of the LCDP 23-29 must ensure that the delivery of development is realistic relative to the capacity of the necessary infrastructure or the level of infrastructural investment that may be required and timeframe for providing same. The lands which are the subject of this submission were the subject of an infrastructural assessment and land use evaluation.

The Wastewater Capacity Register issued in April, 2026 by Uisce Éireann outline the capacity for wastewater treatment and water supply in each of the settlements in the county. Carrigallen has been identified as having no capacity available (Red) in terms of wastewater treatment.

The submission received from Uisce Éireann (VAR SUB 1-21) outlines that there is an upgrade project underway to increase capacity at Carrigallen Wastewater Treatment Plant and this is currently at Stage 2 under the Small Towns and Villages Growth Programme.

It should be noted that as part of the preparation of the next County Development Plan and the move to 10-year development plans, the land use zoning objectives of all settlements in the county will be reviewed. Again, at this stage, all potential lands will be assessed on their merits having regard to a comprehensive range of evidenced-based supporting documents including inter alia a Settlement Capacity Audit (SCA), a Social Infrastructure Audit, a Strategic Flood Risk Assessment and other environmental reports.

It is considered that the lands would be more appropriately considered for zoning within the next County Development Plan review rather than through the current variation process.

Chief Executive's Recommendation:

No change recommended.

Section 5

Conclusion

5. Conclusion

As it has been outlined in the responses to the submissions received, a total of 8 no. Chief Executive Recommendations are now proposed. The proposed recommendations are outlined as follows:

CE Recommendation no. 1: To include the Carrick-on-Shannon Local Transport Plan, which was prepared as part of the Carrick-on-Shannon Joint Local Area Plan 2025-2031, into the LCDP 23-29 as Appendix XIII.

CE Recommendation no. 2: To include the following wording at the end of Section 8.7 *Promoting Sustainable Mobility* of the LCDP23-29:

As part of the preparation of Carrick-on-Shannon Joint Local Area Plan 2025-2031, a Local Transport Plan (LTP) has been undertaken on behalf of Leitrim and Roscommon County Councils and in conjunction with the National Transport Authority (NTA). The LTP, included here as Appendix XIII, examines existing and proposed transport infrastructure for all modes of transport, including walking and cycling, and provides some insight into existing transport patterns and constraints.

The detail associated with new transport infrastructure projects referred to in this Plan and associated LTP, including locations and any associated mapping, that are not already permitted or provided for by existing plans/programmes/etc. is non-binding and indicative. Such new projects shall be subject to feasibility assessment, taking into account the environmental constraints and the objectives of the Plan relating to sustainable mobility. A Corridor and Route Selection Process will be undertaken for such projects where appropriate. Proposed interventions will be required to demonstrate that they are consistent with all relevant legislative requirements.

The implementation of the transport strategies proposed should lead to a significant reduction in private motor vehicle mode share for the study area from 67% in 2022 to 49% in 2042 for all commuting trips. The active travel and public transport share target for all commuting trips is to see an increase from 33% in 2022 to 51% in 2042.

CE Recommendation no. 3: To revise the wording of Objective MSSM OBJ 1, as stated in Section 8.7 *Promoting Sustainable Mobility* of the LCDP23-29, as follows:

~~To prepare a Local Transport Plan in collaboration with the National Transport Authority (NTA), Transport Infrastructure Ireland (TII), Roscommon County Council and other relevant stakeholders for the Key Town of Carrick-on-Shannon and establish specific modal share targets for the town to be incorporated into the forthcoming Carrick-on-Shannon Local Area Plan. This will include devising and implementing an effective monitoring programme for the achievement of the modal share targets contained therein.~~

Progress the delivery of the appropriate measures and interventions as outlined in the Carrick-on-Shannon Local Transport Plan (LTP) on a phased basis and subject to the availability of funding, in order to support the shift towards sustainable travel and transport throughout the joint urban area and to accommodate anticipated transport demand due to planned population growth.

CE Recommendation no. 4: To include the following wording in Section 1.2 *'Uisce Éireann Capacity Registers'* of the Settlement Capacity Report published as part of the proposed Variation:

It should be noted that the figures included in the Uisce Éireann Capacity Reports are dynamic and subject to change.

CE Recommendation no.5. Revise Proposed Amendment no. 9 to include the following:

It should be noted that the '*Carrick-on-Shannon Bypass and Traffic Management Plan'* project citation within the National Development Plan Investment Objective remains *'N4 Carrick-on-Shannon to Dromod Scheme*'.

CE Recommendation no. 6. To change the land use objective of lands outlined in Submission VAR 1-7 from '*Tourism Related Development*' to '*New Residential'*.

CE Recommendation no. 7. To change the land use objective of lands outlined in Submission VAR 1-8 from '*Enterprise and Employment*' to '*New Residential'*.

Chief Executive's Recommendation No. 8: To change the land use objective of lands outlined in Submission VAR 1-19 from '*New Residential – Low Density'* to '*New Residential'*.

It is considered that some of the proposed modification(s) such as changing the land use zoning objective in Drumshanbo constitute a material alteration to the proposed Variation and Leitrim County Council shall publish the modification(s) that constitute a material alteration not later than 2 weeks after the passing of the resolution by the Members should you collectively agree with said recommendation.

Appendix 1

Submission Ref. No	Name
VAR SUB 1-1	Catherine Cumiskey Hayes
VAR SUB 1-2	Health and Safety Authority
VAR SUB 1-3	Arthur Dolan
VAR SUB 1-4	Transport Infrastructure Ireland
VAR SUB 1-5	Dept of Education and Youth
VAR SUB 1-6	Environmental Protection Agency
VAR SUB 1-7	P&A Lakeside Investments Ltd
VAR SUB 1-8	Shane McGovern
VAR SUB 1-9	National Transport Authority
VAR SUB 1-10	An Taisce - The National Trust for Ireland
VAR SUB 1-11	Fermanagh and Omagh District Council
VAR SUB 1-12	Office of the Planning Regulator
VAR SUB 1-13	Brendan Sammon
VAR SUB 1-14	John Reilly
VAR SUB 1-15	Gary Reilly
VAR SUB 1-16	Wesley Notley
VAR SUB 1-17	Aaron O'Connor
VAR SUB 1-18	Office of Public Works
VAR SUB 1-19	John McKenna
VAR SUB 1-20	Electricity Supply Board
VAR SUB 1-21	Uisce Éireann
VAR SUB 1-22	Donal Cadden



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