



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

11th May 2026

Re: Submission on Proposed Variation No. 1 to the Leitrim County Development Plan 2023–2029 – Request for Rezoning of Lands at Lough Allen Hotel & Spa, Drumshanbo, Co. Leitrim

Dear Sir / Madam,

We write to make the following submission in relation to Proposed Variation No. 1 to the Leitrim County Development Plan 2023–2029 and specifically request that Leitrim County Council facilitate the rezoning of the subject lands from their current tourism/leisure zoning designation to a zoning objective which would support permanent residential use and residential-led redevelopment.

For reference this submission is made on behalf of the land owner; P&A Lakeside Investments Ltd.

1. Introduction and Context

By way of background the Lough Allen Hotel & Spa complex (the subject lands) was originally developed as a tourism and leisure-based development comprising:

- Hotel accommodation;
- Spa and leisure facilities;
- Ancillary hotel suites;
- Holiday homes and tourism accommodation;
- Associated roads, parking, landscaping and infrastructure.

Unfortunately, it is now evident that the tourism-led model for the development has failed and the wider scheme has effectively collapsed from an operational and commercial perspective.

To set the context we highlight:

- The hotel has remained closed for a prolonged period;
- The associated leisure and tourism facilities are no longer operating;
- The hotel suites and holiday homes have become vacant, partially derelict and are falling into increasing disrepair;
- Large parts of the subject lands remain under utilised or entirely idle.

In essence the current planning and zoning framework no longer reflects the reality on the ground nor the evolving housing and planning priorities at local, regional and national level.

For reference the subject lands are outlined below. As per the existing 2023 CDP the lands are zoned ‘Tourism and Related Development.’

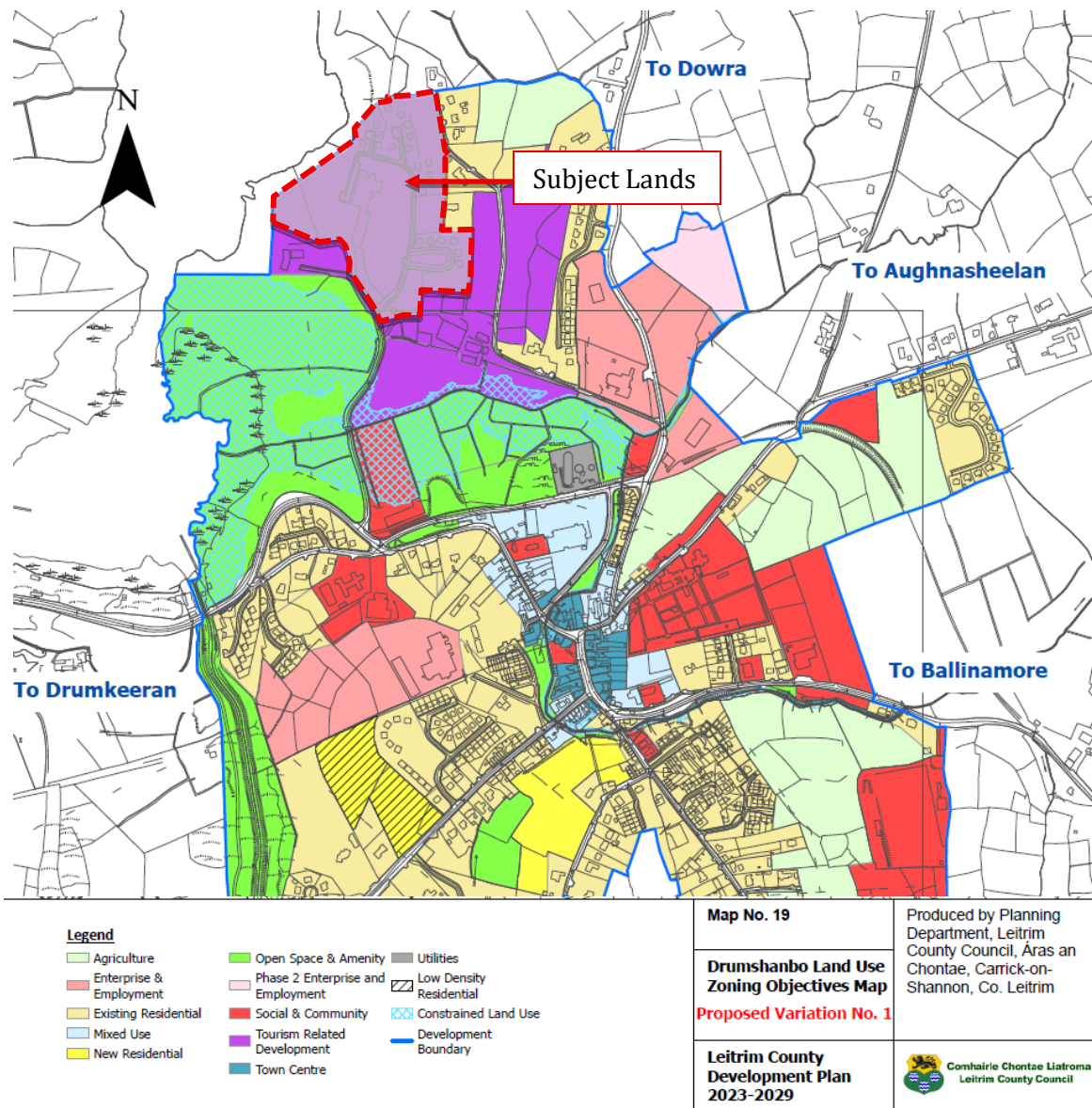


Figure 1 Subject lands for reference outlined in red

As all stakeholders are aware Ireland is currently experiencing a severe and well-documented housing shortage.

The National Planning Framework (NPF), together with the National Planning Framework Implementation: Housing Growth Requirements Guidelines for Planning Authorities, specifically require local authorities to identify and facilitate additional residential lands capable of contributing towards housing delivery and compact growth objectives.

In the context of Government policy seeking to provide more housing unfortunately even with an increase in home building there remains an acute shortage of homes and also a shortage of zoned land.

To set the context on housing delivery across the Country we summarise key findings from the CSO

- Between 2024 and 2025, the largest relative increase was in apartment completions, which were up 38.7% from 8,687 in 2024 to 12,047 in 2025.
- The number of scheme dwellings completed rose by 13.1% to 18,308 in 2025, and there was an increase of 12.5% to 5,929 in single dwellings completed in 2025.
- Among completions in 2025, 50.5% were scheme dwellings, 33.2% were apartments, and 16.3% were single dwellings. Analysis of the data shows that the proportion of apartments being built has been growing over recent years from 16.3% of completions in 2019 to 33.2% in 2025.
- For Q4 2025, there was a 60.7% rise in apartments completed compared with the same quarter in 2024. There was a 30.3% increase in scheme dwelling completions and an increase of 25.8% in single dwelling completions from Q4 2024.

New Dwelling Completions

	Single	Scheme	Apartment	Totals
2024	5,268	16,192	8,687	30,147
2025	5,929	18,308	12,047	36,284
% change	12.5%	13.1%	38.7%	20.4%
Quarter 4 2024	1,443	4,669	2,547	8,659
Quarter 4 2025	1,816	6,084	4,094	11,994
% change	25.8%	30.3%	60.7%	38.5%

The graph below from the CSO details the current trend on home delivery. Ultimately this is resulting in a demand for more housing land to be zoned.



Figure 2 Extract from CSO database showing the Total Number of Planning Permissions 2022-25

In this context the need under the Revised NPF to zone additional lands for housing is timely.

The proposed Variation No.1 itself expressly acknowledges the need:

- To identify additional residential lands;
- To facilitate increased housing delivery;
- To respond to updated national housing growth requirements.

We note the proposed Variation No. 1 to the Leitrim CDP is expressly intended to ensure that the planning framework contains sufficient residential zoned land to facilitate housing growth requirements over the plan period. It also includes the addition of further lands with a “New Residential” land use zoning objective to address those requirements.

Having reviewed the delivery of new housing in the County our analysis finds a low level of housing delivery in the County during 2025 with only 105 new residential units delivered; shown below.

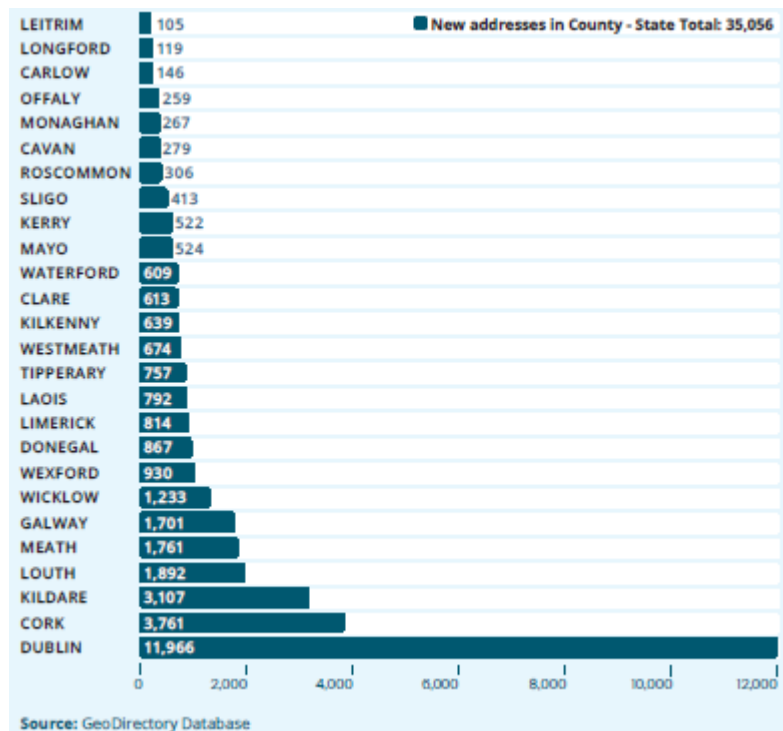


Figure 3 Extract from Geodirectory Residential Database

In this context we submit the subject lands should be prioritized for residential-led zoning because they comprise an existing developed, serviced and underutilised landholding capable of contributing towards housing delivery within a relatively short timeframe. It is also highlighted that with existing services and infrastructure in-situ these lands are Tier 1 and ideal to deliver housing in the immediate future.

Having reviewed the proposed Variation we also note it incorporates zoning proposals to introduce additional residential zoning lands within Drumshanbo and elsewhere in the county in response to updated housing growth requirements.

In response we say the subject lands should therefore be considered within that same strategic housing and settlement growth context.

We highlight the subject lands represent a significant opportunity to:

- Deliver housing units within an existing serviced settlement;
- Reuse and regenerate a partially vacant and deteriorating development;
- Avoid unnecessary greenfield expansion;
- Utilise existing infrastructure and public investment;

- Contribute towards compact growth and sustainable development objectives.

3. Existing Infrastructure and Servicing

Under the Section 28 Guidelines ‘NPF Implementation: Housing Growth Requirements’ section 2.4 therein sets out:

‘It is the policy of the NPF that Planning Authorities are required to apply a standardized, tiered approach to zoning to differentiate between (i) zoned land that is serviced and (ii) zoned land that is serviceable within the life of the plan (NPO 101).’

Appendix 3

A Methodology for a Tiered Approach to Land Zoning

The National Planning Framework sets out a two-tier approach to land zoning as follows:

Tier 1: Serviced Zoned Land

This zoning comprises lands that are able to connect to existing development services, i.e. road and footpath access including public lighting, foul sewer drainage, surface water drainage and water supply, for which there is service capacity available, and can therefore accommodate new development.

These lands will generally be positioned within the existing built-up footprint of a settlement or contiguous to existing developed lands. The location and geographical extent of such lands shall be determined by the planning authority at a settlement scale as an integral part of the plan-making process and shall include assessment of available development services.

Inclusion in Tier 1 will generally require the lands to be within the footprint of or spatially sequential within the identified settlement.

Tier 2: Serviceable Zoned Land

This zoning comprises lands that are not currently sufficiently serviced to support new development but have potential to become fully serviced within the life of the plan i.e. the lands are currently constrained due to the need to deliver some or all development services required to support new development, i.e. road or footpath access including lighting, foul sewer drainage, surface water drainage, water supply and/or additional service capacity.

In response we highlight the lands are already substantially serviced and developed. The lands benefit from:

- Existing road infrastructure;
- Internal access roads;
- Footpaths and public realm infrastructure;
- Existing water infrastructure;
- Existing wastewater infrastructure;
- Existing electricity and utility connections;
- Existing parking and circulation areas.

We note the Settlement Capacity Report accompanying Proposed Variation No. 1 highlights the importance of identifying and prioritising lands capable of supporting sustainable residential growth through the availability of existing or deliverable infrastructure and services.

In this regard the subject lands already benefit from substantial existing infrastructure investment including roads, access routes, footpaths, lighting, utilities, water services, wastewater infrastructure and established site servicing.

Accordingly the lands are Tier 1 and should be prioritized for residential zoning in advance of other greenfield lands.

We say the reuse and repurposing of these lands for residential purposes would therefore represent a sustainable and efficient use of existing infrastructure investment and aligns strongly with national compact growth and regeneration policy objectives.

4. Sustainable Development and Compact Growth

The proposed rezoning would strongly align with:

- The National Planning Framework;
- The Regional Spatial and Economic Strategy (RSES) for the Northern and Western Region;
- The Sustainable Residential Development and Compact Settlement Guidelines 2024;
- The core strategy objectives of the Leitrim County Development Plan.

The redevelopment of an existing underutilised tourism complex for residential purposes would:

- Promote brownfield regeneration;
- Reduce vacancy and dereliction;
- Increase long-term residential occupancy;
- Support population growth in the area;
- Assist in sustaining local services and economic activity;
- Reduce pressure for peripheral greenfield development.

The subject lands are already integrated within the existing built environment and are capable of accommodating residential development in a sustainable and coordinated manner.

5. Changed Economic and Planning Circumstances

In terms of historical context the tourism/leisure zoning objective applying to the lands was based on a development model which has demonstrably failed over time. In contrast the planning and land use reality now is:

- The hotel operation has ceased;
- The tourism accommodation model has not succeeded;
- The development has become increasingly vacant and underutilised;
- Significant elements of the scheme are deteriorating physically and economically.

Given the low level of housing delivery in the County we submit the proper planning and sustainable use of the lands would be to develop the lands for residential purposes.

6. Zoning and Long-Term Planning Position

Going forward it is important to note that the wider lands associated with the development are currently understood to be zoned primarily for tourism, leisure and hotel-related uses rather than standard permanent residential use.

While it may be possible to seek planning permission for certain residential uses within the existing planning framework, there is no certainty that the Local Authority will support large-scale or permanent residential redevelopment of the wider scheme in its current zoning context.

In practical terms, any attempt to regularise or support long-term permanent residential use across the wider development may ultimately require:

- A rezoning process;
- A variation to the Development Plan;
- Or a material policy shift by the Local Authority.

Such a process is complex, time-consuming and expensive and would typically involve:

- Preparation of detailed planning and zoning submissions;
- Engagement with planning consultants, architects, engineers and other specialists;
- Preparation of planning policy, housing need and development justification reports;
- Engagement with planning officials and elected members;
- Participation in Development Plan or Local Area Plan review processes;
- Statutory public consultation procedures;
- Potential objections and third-party submissions;
- Significant professional costs and extended timelines;
- No guarantee whatsoever of a successful outcome.

Accordingly, the current zoning and planning policy position represents a significant additional

development risk which materially impacts the viability, timing and long-term redevelopment potential of the project.

Given the lakeside location of the lands, it is acknowledged that flood risk and environmental considerations will require appropriate assessment as part of any future planning application or masterplan process.

However, it is also relevant to note that the Lough Allen Hotel & Spa development has been in existence and operational for in excess of 20 years and, to the best of our knowledge, has not experienced any significant flooding events affecting the development during that period.

The lands already comprise an established developed site with substantial existing infrastructure and built development in place.

Notwithstanding same, any future residential-led masterplan or planning application can, where required, be supported by an appropriate site-specific Flood Risk Assessment and will comply with the relevant flood risk management policies, sequential approach principles and environmental assessment requirements of the Development Plan.

7. Planning Merit of Residential Rezoning

A residential or mixed residential zoning objective would provide:

- Greater planning certainty;
- A coherent long-term redevelopment framework;
- The ability to bring vacant and underutilised units back into productive use;
- An opportunity to regenerate a prominent but currently struggling development.

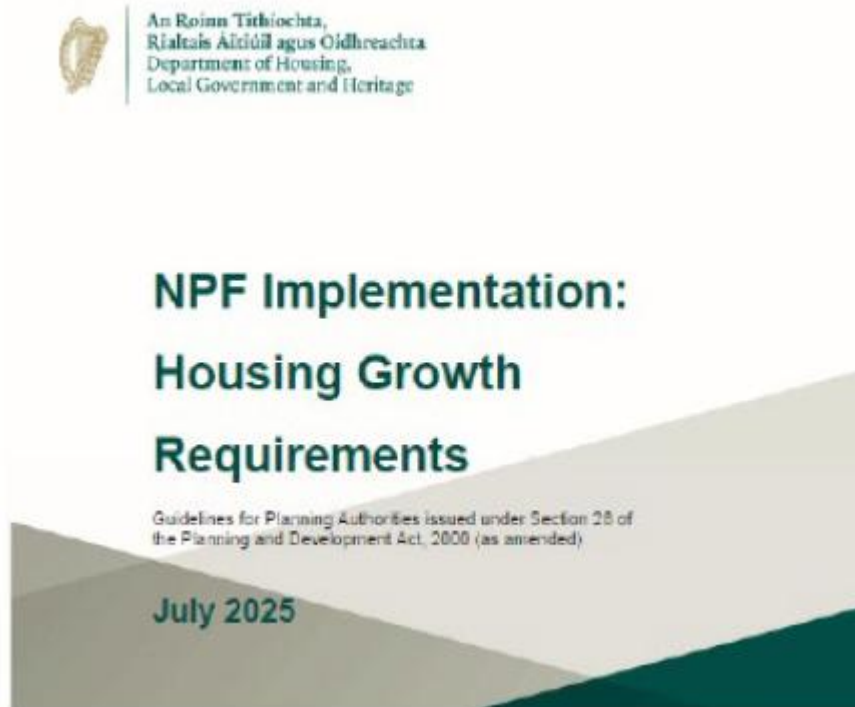
Importantly rezoning would not preclude:

- Appropriate tourism uses;
- Mixed-use redevelopment;
- Leisure or hospitality elements where viable.

Rather, it would provide flexibility to facilitate a realistic and sustainable long-term future for the site.

8. Potential Housing Delivery and Strategic Opportunity

We note the Section 28 Guidelines ‘NPF Implementation: Guidelines For Planning Authorities’ place emphasis on ‘*a particular focus on the likelihood that the lands identified for residential development within the plan will come forward for development within the remaining period of the plan.*’



With services already established the subject lands also represent a significant opportunity for the phased delivery of additional housing units within an already serviced and established development.

In particular:

- The existing 24no. hotel suites could potentially be upgraded and converted into residential apartments within a relatively short timeframe, subject to planning permission and compliance works;
- The 6no. existing houses could similarly be renovated, regularised and brought back into productive residential use within a relatively short period;
- There is also potential to revisit previously permitted residential development within the scheme, including the possibility of reapplying for lapsed permissions relating to additional housing units;
- Further residential development opportunities may also exist across the wider lands, subject to appropriate zoning and planning approvals.

The subject lands therefore represent a rare opportunity to:

- Reactivate a partially vacant and underutilised development;
- Deliver additional housing units in a phased and sustainable manner;
- Utilise existing infrastructure and servicing capacity;
- Contribute meaningfully towards housing supply objectives within County Leitrim.

Given the scale of the wider lands and the substantial infrastructure already in place, an appropriate residential or residential-led zoning objective could facilitate the delivery of a significant number of additional housing units over time and make a meaningful contribution towards meeting current and future housing demand in the area.

The proposed Variation also reflects updated national apartment design standards and sustainable residential development guidance.

Accordingly, any future residential redevelopment of the lands can be progressed through a coordinated and properly planned masterplan-led approach capable of addressing:

- Apartment design standards;
- Internal floor areas;
- Storage requirements;
- Amenity and balcony provision;
- Open space;
- Access and circulation;
- Parking;
- Infrastructure and servicing requirements.

This would ensure that any future residential development is delivered in a comprehensive, policy-compliant and sustainable manner rather than through fragmented or piecemeal development proposals.

9. Deliverability and Active Development Interest

Going forward we highlight for the Planning Authority Importantly, there is currently an active developer interest in progressing the redevelopment and residential activation of the site.

We are already engaged in pre-planning discussions and preparatory work with a view to lodging planning applications for the conversion, renovation and delivery of residential units within the development, subject to the appropriate zoning framework and planning permissions being put in place.

This would include:

- The potential conversion and upgrading of the existing 24 hotel suites into residential apartments;
- The renovation and regularisation of the existing 6 houses for long-term residential occupation;
- The potential reactivation of previously permitted residential development within the wider scheme;
- The assessment of additional residential development opportunities across the remaining lands, subject to appropriate zoning and planning approvals.

This demonstrates that the redevelopment potential of the lands is not merely theoretical but represents a realistic and deliverable opportunity capable of contributing towards housing supply within a relatively short timeframe.

In the context of current housing shortages and the need to activate serviced and underutilised lands, the subject site represents a strategically important opportunity for Leitrim County Council to facilitate sustainable and deliverable residential growth.

10. Summary and Conclusion

The subject lands incorporating Lough Allen Hotel & Spa complex represent a substantial underutilised and partially derelict development located on serviced lands with significant existing infrastructure already in place.

The original tourism-led model has failed and the current zoning no longer reflects either the reality of the site or the pressing housing requirements now facing County Leitrim and the wider State.

In the context of:

- The National Planning Framework;
- Updated Housing Growth Requirements;
- Compact growth policy;
- Sustainable settlement objectives;
- The need to maximise the use of existing serviced lands;

To conclude the subject lands are ideally located to satisfy National and local policy in relation to identifying lands that are appropriate to meet housing demand, and represent a logical and deliverable addition to the zoning strategy under the Proposed Variation.

In summary this submission requests the lands are zoned to provide for residential use and residential-led redevelopment. Should a Key Site Objective be deemed appropriate to provide for residential use this would also be acceptable.

The landowner and project team would welcome the opportunity to discuss the proposals with the Local Authority as part of the Variation No. 5 process and the ongoing review of the County Development Plan during 2026.

Yours sincerely



Ronan Woods
Director

Enclosed

Folio Maps

597380 mE, 812020 mN



Tailte Éireann

Clárúchán, Luacháil, Suirbhéireacht Registration, Valuation, Surveying

Folio: LM15985F

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-  Freehold
-  Leasehold
-  SubLeasehold



Burdens (may not all be represented on map)

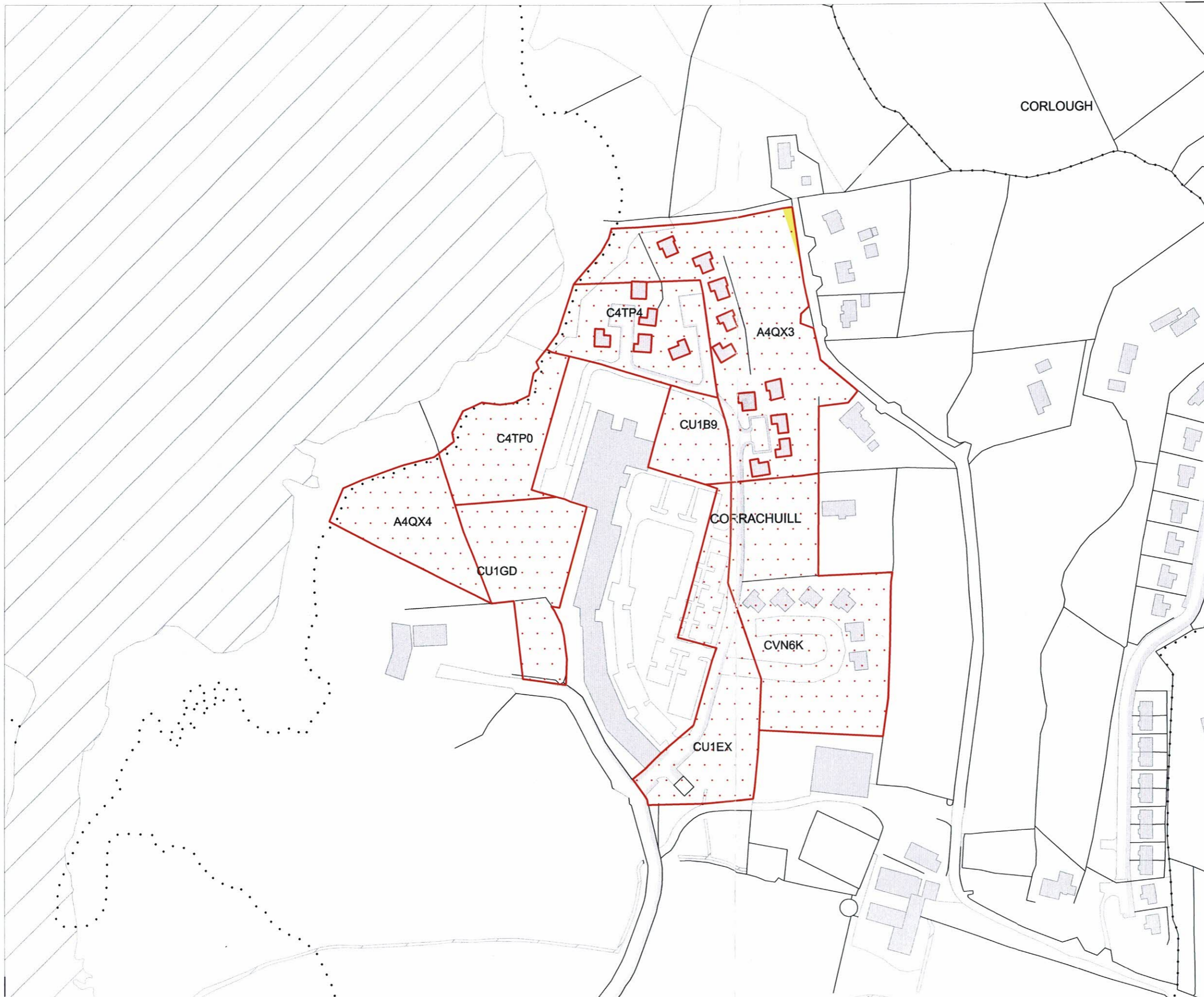
-  Right of Way / Wayleave
-  Turbary
-  Pipeline
-  Well
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597390 mE, 811990 mN



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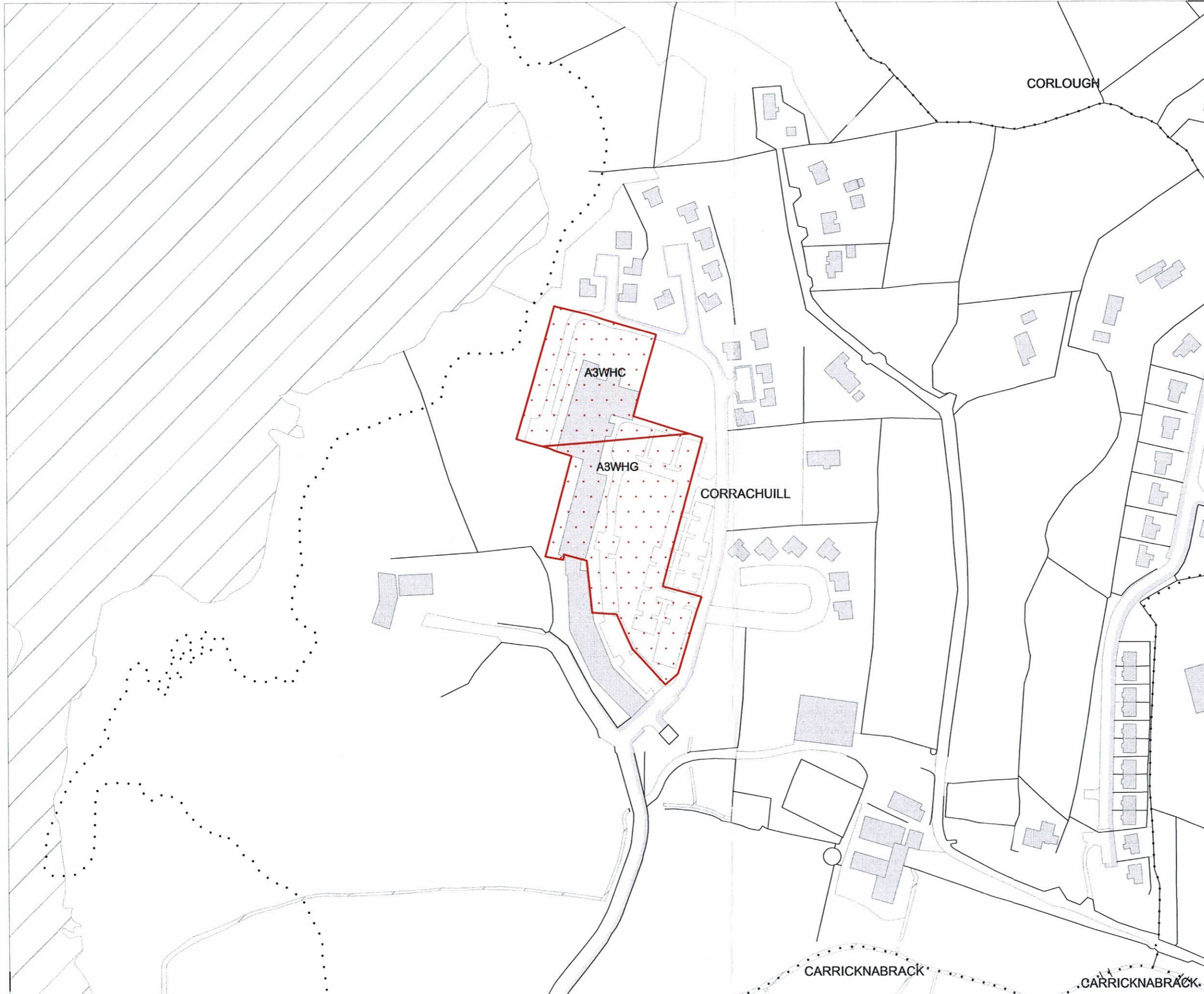
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597140 mE, 811700 mN



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