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

Via portal: www.carrickjointplan.ie

07/02/2025

RE: PROPOSED MATERIAL ALTERATIONS TO THE DRAFT CARRICK-ON-SHANNON JOINT LOCAL AREA PLAN 2025-2031

A Chara,

I refer to your notification on 8 January 2025 of Proposed Material Alterations to the Draft Carrick-on-Shannon Joint LAP 2025-2031 (Draft JLAP) and thank you for the opportunity to make this submission.

Background

The Draft Carrick-on-Shannon Joint Local Area Plan 2025-2031 was published in August 2024, and the Northern and Western Regional Assembly (the Assembly) made a submission to it on 3 October 2024.

The Elected Members of Carrick-on-Shannon Municipal District held on Monday 9 December 2024, and a Meeting of the Elected Members of Boyle Municipal District, also held on Monday 9 December 2024, proposed to make changes to the plan that constitute Material Alterations.

NWRA Submission to the Draft Local Area Plan

The Assembly's submission to the Draft JLAP set out nine recommendations:

These recommendations are set out below, with a commentary on whether or not they have been incorporated into the Material Amendments, beyond an assessment on the whether the issues previously highlighted by the Assembly have been addressed. This report will comment generally on whether the Plan in its revised form is consistent with Regional Policy. Where Material Amendments have been made that are not of relevance to the RSES, it is not proposed to offer comment on same.

Assembly Recommendations at Draft Plan Stage

- 1 a) The JLAP would benefit from the Core Strategy incorporating some reference to the Growth Ambition for Carrick-on-Shannon as a Key Town in the RSES. Such a reference would enable the provision of a commentary on the current and future growth trajectory in terms of



its consistency or otherwise with Sec. 3.4 of the Regional Strategy, which envisages an uplift across all designated Key Towns of 30% to 2040. This summary of Carrick-on-Shannon's sub-regional role should include a clear Core Strategy table, which sets out the area and quantum of housing to be delivered on lands zoned 'inner core', 'outer core 'existing residential' and 'new residential', with appropriate indicative densities that demonstrate anticipated yield.

b) The current residential zoning allocation is considered a minimum level to enable the town to realise its RSES ambitions as a Key Town.

Commentary: The core strategy has not been reflected, as was suggested by the Assembly during the Draft Plan Consultation. In overall terms, a number of sites which were previously zoned as Residential lands have been removed from the quantum of housing lands, and reassigned as Amenity / Open Space use (Refers: MA30, MA31, MA32 and MA33). However, it is unclear if this is consistent with the Core Strategy of the Leitrim and Roscommon Development Plans.

Outcome: The Core Strategy of the Plan, setting out the vision for Carrick on Shannon has not been altered to directly incorporate reference to the RSES goals / targets for Carrick on Shannon.

The opening Chapter does not outline a headline growth ambition in either demographics or housing units over the Plan Period.

- The JLAP would be enhanced via the inclusion of a clear synopsis of the Critically Enabling Infrastructure necessary to enable Carrick-on-Shannon to fulfil its role as a Key Town, and such projects should be classified in terms of potential delivery timelines (e.g. Short/Medium/Long term).

Commentary: No breakdown of Critically Enabling Infrastructure, via a table or any other means, has been provided.

Outcome: This is a missed opportunity, as the inclusion of a breakdown of required improvements would have been beneficial to both the public and private sectors in planning for enabling sustainable compact growth.

- In relation to 1 and 2 above, the JLAP would benefit from an element of commentary in respect of how the future supply of housing units can be increased, given the current notably low supply base of residential units, and measures required to significantly increase overall delivery in both Local Authority Areas of Carrick-on-Shannon.

Commentary: A commentary has not been provided in respect of how delivery of housing can be increased, however MA 3 proposes Active Land Management, and both Local Authorities commit to a range of measures to be undertaken and maintained over the Plan period, which includes using measures to ensure an adequate supply of residential land is available, including the possibility of CPO of sites and release of same onto the open market if deemed necessary.

Outcome: Further to points 1 and 2, the removal of residential zoned land and the absence of the breakdown of critically enabling infrastructure represents a shortcoming within the Plan.



MA 3 is to be welcomed and adds some buttressing to the overall issue being raised by the Assembly, which relates to the need to clearly communicate how housing delivery can be increased from its current modest base.

4. That the Core Strategy of the JLAP is revised to incorporate clear timelines across a range of objectives, projects and policy commitments.

Commentary: The Core Strategy has not been revised, and the timelines across objectives have not been incorporated within the Material Amendments.

Outcome: The absence of clear timelines demonstrating objectives and projects is a missed opportunity to provide firm commitments to future development.

5. Consideration should be given to the provision of a clear vision to be set out within Section 1 of the Plan. This summary statement of the future vision for Carrick-on-Shannon should include reference to the pipeline supply and provision of key enabling infrastructure, which could be encompassed at the outset in a single location, or table.

Commentary: No clear future vision has been set out in the JLAP.

Outcome: Further to points 1-4, a reference to pipeline supply and provision of key infrastructure would provide a firm commitment towards sustainable compact growth and allow Carrick-on-Shannon to present itself as a forward-looking key town driving economic growth in the subregion.

6. Consideration should be given to the provision of serviced sites as a mechanism to deliver increased housing supply, as envisaged through RPO 3.7 of the RSES.

Commentary: MA5 includes Policy Objective TC10 to facilitate the development of serviced sites.

Outcome: This has been partially achieved with a commitment being proposed to support the provision of serviced sites which is in line with RPO 3.7.

7. The Plan should consider Local Authority-led Masterplans for the identified opportunity sites, as applicable across the plan, rather than developer-led frameworks. In the absence of detailed Local Authority Masterplans or a commitment to prepare same, a number of Guiding principles for each site could, at a minimum, be outlined in the JLAP.

Commentary: MA5 introduces TC5 which aims to support stakeholders to prepare masterplans.

Outcome: The measure in relation to Local Authority led plans has been partially supported but has not provided commitments for the Local Authorities to prepare or commission Masterplans.

8. The Draft Local Transport Plan should be adopted in advance of or in tandem with the Local Area Plan and should align with the objectives of the Local Area Plan.

Commentary: The LTP would appear to align with the JLAP following changes identified in Appendix 4 of the Material Alterations.



Outcome: The LTP in tandem with the objectives of the JLAP is welcome and aligns with RPO 6.34. The Local Transport Plan aligns with the Land-use Plan, and the delivery of significant elements of the LTP are key to the success of the Plan overall, and the Assembly welcome the tandem approach of both Council's in this regard.

9. Consider including locations/indicative locations for the Community Hall and Transportation Hub on the spatial plan appropriate or outline the process via which lands for this purpose will be identified.

Commentary: No commentary has been offered on the locations for a community hall. MA19 introduces Policy MT9 which allows for a park and ride facility with terminal building. Whilst this is not the equivalent of a transport hub for Carrick on Shannon, it is a step forward in terms of the detail provided in the Plan, and this is welcomed by the NWRA.

Outcome: The absence of a community hall is a missed opportunity to provide a key piece of social infrastructure in the town. The park and hike facility is a welcome addition and further supports RPO 6.34.

OTHER PROPOSED MATERIAL ALTERATIONS NOT COMMENTED UPON ABOVE

The remainder of the of the Material Amendments did not impact upon the broad or specific goals of the RSES and, as many are not germane to the RSES, the Assembly does not intend to comment further on same. For the purposes of clarity, the proposed alterations to amend text/ policy/ maps in the Draft JLAP relate to the following general areas:

- Heritage
- Ecology
- Land activation measures
- Tourism
- Climate action
- Flood relief scheme
- Transport infrastructure
- Water and wastewater capacity
- Social and community infrastructure
- Built heritage
- Amendment to the land use zoning matrix

CONCLUSION

The Assembly recognises that the Draft JLAP for Carrick on Shannon supports the concept of compact urban growth and is therefore broadly consistent with one of the key pillars of Chapter 03 of the RSES, and this approach is to be commended. Several of the Material Amendments introduced are to be welcomed, particularly MA 5 (Serviced Sites), MA 19 (Park & Ride), MA 3 (Land Activation), as well as other elements such as the alignment of the JLAP and the Local Transport Plan. All of these additional policy elements enhance the Plan and increase alignment with the RSES.

The Assembly consider it regrettable the Material Amendments made have not:



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1. Incorporated a clear delineation (within the opening 2 Chapters of the Plan) of the overarching ambitions for Carrick on Shannon, which give effect to the RSES, and
2. Effectively conveyed the Key Infrastructural priorities for the Town over the Medium Term, which is an omission that amounts to a missed opportunity in setting out a clear framework for its future advancement.

I trust that the above is of assistance and the Assembly wish to thank both Leitrim and Roscommon County Councils for the opportunity given to provide this submission. If you have any queries in respect of the above, then do not hesitate to revert.

Mise le meas



Denis Kelly
Director



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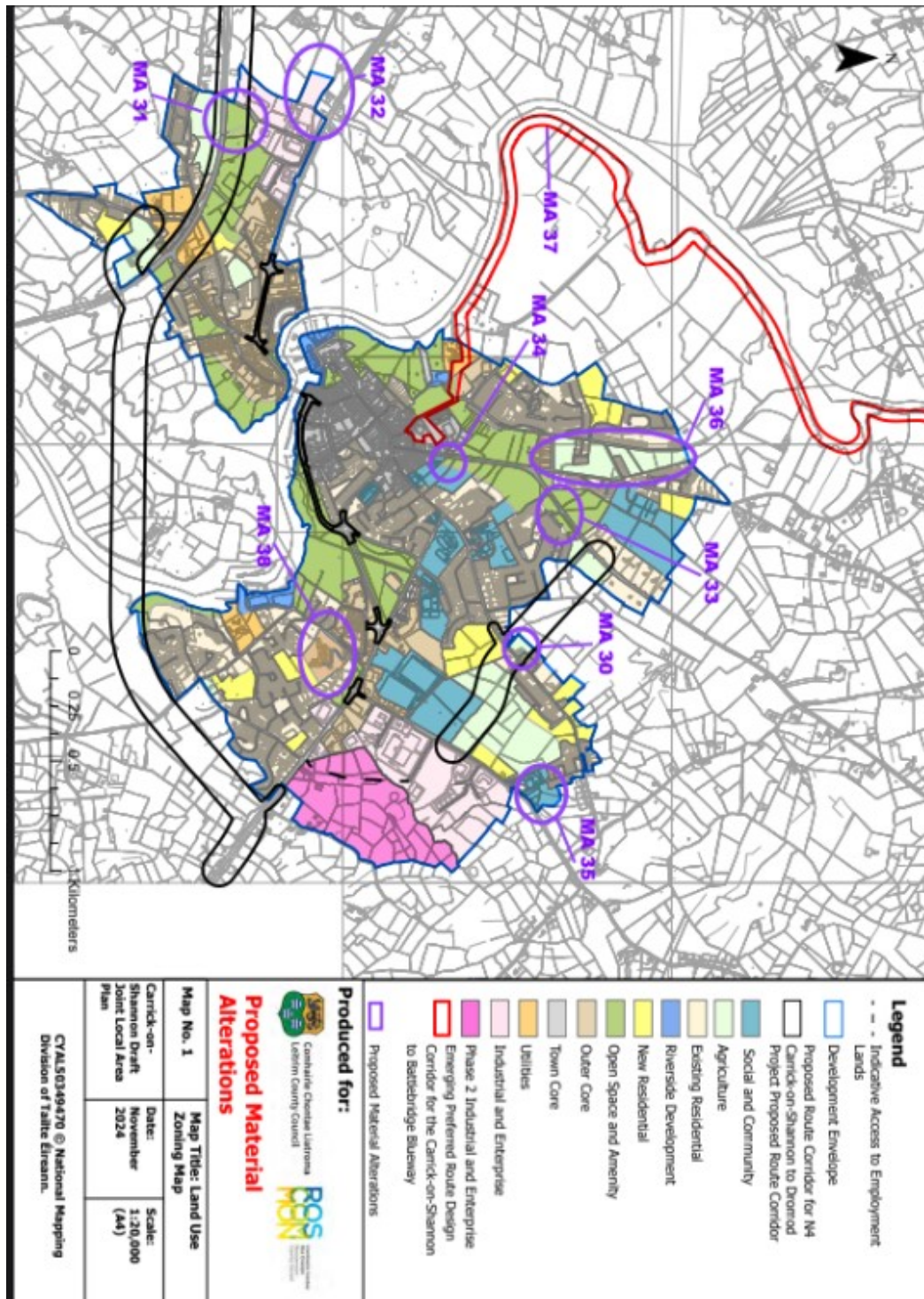


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APPENDIX 1 – LAND USE ZONING MAP AND PROPOSED MATERIAL ALTERATIONS

(Source: Leitrim/Roscommon County Councils proposed material alteration documents)



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