

4th October 2024

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

And

Forward Planning,
Planning Department,
Roscommon County Council,
Áras an Chontae,
Roscommon,
Co. Roscommon.

Re: Draft Carrick-On-Shannon Joint Local Area Plan 2025-2031

A chara,

Thank you for your authorities' work on preparing the draft Carrick-On-Shannon Joint Local Area Plan 2025-2031 (the draft Joint Local Area Plan).

The Office of the Planning Regulator (the Office) wishes to acknowledge the considerable and evident work your authorities have put into the preparation of the draft Joint Local Area Plan.

As your authorities are aware, a key function of the Office is the assessment of statutory plans to ensure consistency with legislative and policy requirements relating to planning.

The Office has evaluated and assessed the draft Joint Local Area Plan under the provisions of sections 31AO(1) and 31AO(2) of the Planning and Development Act 2000, as amended (the Act), and this submission has been prepared accordingly.

The Office's evaluation and assessment has had regard to the Leitrim County Development Plan 2023-2029 (the Leitrim County Development Plan), and the

Roscommon County Development Plan 2022-2028 (the Roscommon County Development Plan), the Regional Spatial and Economic Strategy (RSES) for the Northern and Western Regional Assembly (NWRA), and relevant section 28 guidelines.

Recommendations issued by the Office relate to clear breaches of the relevant legislative provisions, of the national or regional policy framework and/or of the policy of Government, as set out in the Ministerial guidelines under section 28. As such, planning authorities are required to implement or address recommendation(s) made by the Office in order to ensure consistency with the relevant policy and legislative provisions.

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

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

Overview

The Office welcomes the preparation of the draft Joint Local Area Plan, having regard to the statutory requirements for same under section 19 of the Act.

Further, the joint approach between both Planning Authorities, in preparing a draft Joint Local Area Plan, creates opportunities for consolidation and balanced growth and ensures that infrastructural requirements to support sustainable growth are co-ordinated and delivered.

The Office acknowledges the range of support documents and appendices accompanying the draft Joint Local Area Plan regarding important matters such as transport, settlement capacity audit and social infrastructure ensuring that the Joint Local Area Plan is evidenced based.

Carrick-On-Shannon has been identified as a Key Town under the RSES and the Office welcomes the economic and employment strategy in the draft Joint Local Area Plan

which will play an important role in enabling the town become an economic driver and strategic employment location within the region.

While the Office welcomes the evident consolidation of the Town Core and Outer Cores and the concentration of New Residential land use zonings in a sequential manner, there is a need to review residential densities for the lands zoned New Residential to ensure consistency with the Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities (2024) (Compact Settlements Guidelines).

In terms of regeneration, the Office welcomes the identification of a number of key opportunity sites in and adjoining the town centre area. Carrick-on-Shannon has a high level of commercial vacancy¹ and it will be important for the draft Joint Local Area Plan to set out actions and policies to proactively address this issue, and to include measurable targets for the plan period.

The Office welcomes the inclusion of a section on implementation and monitoring in the draft Joint Local Area Plan, but suggests changes that may facilitate more targeted implementation of the Joint Local Area Plan and provide for a more focused and effective monitoring system to the benefit of the Joint Local Area Plan.

It is within this context the submission below sets out six (6) recommendations and two (2) observations under the following themes:

Key theme	Recommendation	Observation
Population, residential development and compact growth	Recommendation 1, 2 and 3	-
Transport and Accessibility	Recommendation 4 and 5	-
Flood risk management	Recommendation 6	-
Climate Action	-	Observation 1
Implementation and monitoring	-	Observation 2

¹ NWRA RSES – Regional Vacancy and Dereliction Analysis (2022).

1. Consistency with Regional, Spatial and Economic Strategy

Section 19(2) of the Act requires that a local area plan shall be consistent with any RSES that applies to the area of the plan.

The RSES recognises that Carrick-On-Shannon plays a strategic role in the region economically, and a key priority for the town is to progress the sustainable development of serviced employment land to the east of the town. The Office acknowledges that the draft Joint Local Area Plan supports and enhances the sustainable economic growth of Carrick-on-Shannon, consistent with its role as a Key Town.

Furthermore, the Office welcomes the approach in the preparation of a Local Transport Plan (LTP), in parallel with the preparation of the draft Joint Local Area Plan, consistent with Regional Policy Objectives (RPO) RPO 6.27 and RPO 6.28 of the RSES.

The RSES recognises that a key transportation priority for Carrick-On-Shannon is the development of the N4 bypass of Carrick-On-Shannon, and the Office notes that a proposed route corridor for the N4 Carrick-On-Shannon to Dromod Project is provided for in the Joint Local Area Plan.

Overall, the Office welcomes the Planning Authorities' approach in preparing a Joint Local Area Plan which will create opportunities for consolidation and compact growth, and is consistent with RPO 3.1 and RPO 3.2 of the RSES.

2. Consistency with the Development Plan and Core Strategy

Section 19(2) of the Act requires that a local area plan is consistent with the objectives of the development plan and its core strategy. This requirement also applies under section 20(5) of the Act.

The Office considers that the overall approach in the draft Joint Local Area Plan, which is ambitious in residential growth targets, and promotes consolidation and sequential development and regeneration within the central area, is generally consistent with the strategic objectives and core strategy Policy Objectives CS OBJ 2, CS OBJ 3, CS OBJ 9, HOUS OBJ 3 of the Leitrim County Development Plan and CS 2.4 of the Roscommon County Development Plan.

The Office also considers the housing targets and the policy objectives of the draft Joint Local Area Plan to be generally consistent with the County Development Plans and their core strategies, except where otherwise specified below.

3. Population, Residential Development, and Compact Growth

As referred to above, the Office notes and welcomes the consistent approach of the core strategy and population growth projections in the draft Joint Local Area Plan with the Leitrim County Development Plan and the Roscommon County Development Plan.

In relation to compact growth, the Office accepts that the overall approach is consistent with RPO 3.1 and RPO 3.2 of the RSES to provide at least 30% of all new homes that are targeted in settlements, within the existing built-up footprints.

Furthermore, the Office welcomes the zoning of additional lands, not previously zoned in the previous plans, for New Residential, as these lands are generally infill sites or sequential in nature and therefore consistent with section 6.2.3 of the sequential approach to zoning of the Development Plans, Guidelines for Planning Authorities (2022) (Development Plans Guidelines).

Based on information available, the Office understands that a total of 70 housing units were completed in Carrick-On-Shannon in the five-year period 2019 – 2023. This amounts to an average of 14 units per annum and suggests that the target of 426 new units will require a significant acceleration in housing delivery in the town.

In this regard, it is considered that the draft Joint Local Area Plan would benefit from the inclusion of specific land activation measures for the sites zoned New Residential and also the seven (7) opportunity sites, the development of which will be key in terms of compact growth. This is addressed in section 3.3 below.

3.1 Tiered Approach to Zoning and Housing Delivery.

Chapter 4 of the Development Plans Guidelines outlines the approach for zoning that should be followed by Planning Authorities.

The Office acknowledges that the Settlement Capacity Audit (appendix 2 of the draft Joint Local Area Plan) comprehensively evaluates the infrastructure capacity of the proposed residential development sites and demonstrates either Tier 1 or Tier 2 status for the twelve (12) proposed sites zoned New Residential in the Joint Local Area Plan,

which is therefore in compliance with National Policy Objective NPO 72(a-c) of the National Planning Framework.

However, following the Office's assessment and engagement with Uisce Éireann, it is noted that public sewer network extensions would be required for several of the sites zoned New Residential.

As referenced above, Carrick-On-Shannon is identified as a key town for sustainable growth within the region. It is critical therefore that the draft Joint Local Area Plan provides clarity regarding the infrastructure provision including public sewer extensions and connections and how development can be facilitated consistent with the core strategies of the County Development Plans. This is addressed in Recommendation 1 below.

Recommendation 1 – Tiered approach to zoning and housing delivery

Having regard to the co-ordination of housing delivery and infrastructure, and in particular to:

- Policy Objectives CS OBJ 2, CS OBJ 3, CS OBJ 9, HOUS OBJ 3 of the Leitrim County Development Plan 2023-2029;
- Policy Objective CS 2.4 of the Roscommon County Development Plan 2022-2028;
- RPO 8.12, RPO 8.15, RPO 12.17, RPO 12.20, and RPO 12.22 of the Regional Spatial and Economic Strategy for the Northern and Western Regional Assembly; and
- the Development Plans, Guidelines for Planning Authorities (2022),

the Planning Authorities are required to consult with Uisce Éireann to ensure that all sites zoned New Residential in the draft Carrick-On-Shannon Joint Local Area Plan 2025-2031 (the Joint Local Area Plan) are appropriately serviced by public sewer infrastructure to facilitate housing delivery within the timeframe of the Joint Local Area Plan. In the case of any site identified as having infrastructure constraints within the life of the Joint Local Area Plan, the Planning Authorities are

required to consider alternative sites deliverable within the timeframe of the Joint Local Area Plan.

3.2 Residential Density

Section 3.3 of the Compact Settlements Guidelines contains updated guidance on residential densities which includes Key Towns. Policy Objective 3.1 on page 32 states:

It is a policy and objective of these Guidelines that the recommended residential density ranges set out in Section 3.3 are applied within statutory development plans and in the consideration of individual planning applications, and that these density ranges are refined further at a local level using the criteria set out in Section 3.4 where appropriate.

Table 3.5 of the Compact Settlements Guidelines contains density ranges for Suburban / Urban Extension areas of Key Towns stating:

It is a policy and objective of these Guidelines that residential densities in the range 30 dph to 50 dph (net) shall generally be applied at suburban and urban extension locations of Key Towns and Large Towns, and that densities of up to 80 dph (net) shall be open for consideration at 'accessible' suburban / urban extension locations (as defined in Table 3.8).

In support of the of the above density range the Office notes that footnote 10 of the Compact Settlements Guidelines supports table 3.5 in terms of the definition of a Key Town, which would apply specifically to Carrick-On-Shannon. While it is acknowledged that table 4.2 of the draft Joint Local Area Plan contains 'refined density' for the proposed 12 sites zoned New Residential, the Office considers that the 'refined density' as proposed would not be consistent with the role of a Key Town as contained in table 3.5 of the Compact Settlements Guidelines. This approach would be consistent with RPO 3.1 and RPO 3.2 of the RSES.

Therefore, section 4.2 of the draft Joint Local Area Plan should be reviewed and the policy intent for density on lands zoned for New Residential should be more explicit having regard to the density ranges for suburban areas referred to in table 3.5.

Furthermore, table 3.5 of the aforementioned guidelines also contains density ranges for Centre and Urban Neighbourhood areas of Key Towns stating ‘it is a policy and objective of these guidelines that residential densities in the range 40 dph-100 dph (net) shall generally be applied in the centres and urban neighbourhoods’.

In respect of residential density on opportunity sites which are generally zoned Town Core or Outer Core, it is not made clear that the policy intention is to seek higher than an average residential density of 35 units per ha on opportunity sites where appropriate and site context and conditions are suitable.

Recommendation 2 – Residential density

Having regard to the sustainable and compact growth of Carrick-on-Shannon, and in particular to:

- section 3.3.3 and table 3.5 of the Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities (2024) (Compact Settlements Guidelines);
- RPO 3.1 and RPO 3.2 of the Regional Spatial and Economic Strategy for the Northern and Western Regional Assembly - compact growth; and
- policy objectives COMPACT POL 1 and DENSITY POL 1 of the Leitrim County Development Plan 2023-2029,

the Planning Authorities are required to:

- (i) review, and amend as appropriate, the ‘refined density’ in table 4.2 of the Draft Carrick-On-Shannon Joint Local Area Plan 2025-2031 to ensure the implementation of the density ranges for Key Towns in section 3.3.3 of the Compact Settlements Guidelines; and
- (ii) include a policy objective supporting the proposed Opportunity Sites which states that the Planning Authorities will implement the density ranges for Centre and Suburban areas of Key Towns in section 3.3.1 of the Compact Settlements Guidelines.

3.3 Regeneration and Land Activation Measures

Section 2.5 of the draft Joint Local Area Plan contains information on the seven Opportunity Sites located within the Joint Local Area Plan. The Office notes that although Opportunity Site 6 and Opportunity Site 7 are located outside the Town Core zoning, the remainder of sites are located within the Town Core, facilitating infill, brownfield and backland development which are intended to accommodate a mix of uses at appropriate densities.

The Office has, however, identified a small number of requirements to ensure consistency and to strengthen the policy framework.

The Compact Settlements Guidelines note that the Government is advancing a range of land activation and active land management measures to ensure that the potential for urban development and regeneration in the built-up areas of cities and towns and at locations close to services and good quality public transport can be accelerated.

In this regard, there is an opportunity to supplement the information provided for each opportunity site in section 2.5 with further details on the anticipated land activation measures required to facilitate residential redevelopment. This would also apply to the 12 sites zoned New Residential in the draft Joint Local Area Plan. The Office advises that the inclusion of specific activation measures should be cognisant of any regeneration strategies or plans prepared for the town.

The Office advises that the inclusion of specific activation measures should focus on identifying and exploiting the opportunities provided through investment in public and sustainable transport infrastructure.

Recommendation 3 – Land Activation Measures for Opportunity Sites and Residential Sites

Having regard to:

- RPO 3.1 of the Regional Spatial and Economic Strategy for the Northern and Western Regional Assembly;
- Policy objective TV 4.15 of the Roscommon County Development Plan 2022-2028;

- Policy objective OPP SITE OBJ 3 of the Leitrim County Development Plan 2023-2029; and

- Policy objectives TC 6, TC 7 and TC 8 of the draft Joint Local Area Plan,

the Planning Authorities are required to identify the key land activation measures required to facilitate the redevelopment of the proposed (7) Opportunity Sites, and the (12) sites zoned New Residential and include this information respectively in sections 2.5 and chapter 4 of the draft Joint Local Area Plan.

4. Transport and Accessibility

4.1 Sustainable Mobility

The Office welcomes the publishing of the LTP in tandem with the draft Joint Local Area Plan, consistent with RPO 6.27 of the RSES, and Objective MSSM OBJ 1 of the Leitrim County Development Plan, and within the context of National Sustainable Mobility Policy, mandatory climate change objectives under the Climate Action and Low Carbon Development Act 2015, as amended and the actions relating to transport under the Climate Action Plan 2024. The Office notes and welcomes the preparation of the LTP using the ABTA methodology, which supports the integration of land use and transport planning by including a range of measures to improve walking, cycling and public transport accessibility.

The LTP clearly recognises the need for a shift to active and sustainable modes to enable Ireland achieve its mandatory climate action targets to reduce greenhouse gas emissions by 51% by 2030. Having clear modal shift ambitions will be important to achieving these targets. Objective MSSM OBJ 1 of the Leitrim County Development Plan indicates an objective to establish mode share targets for inclusion in the Joint Local Area Plan. The Office notes, however, that mode share targets have not been included. It is recommended that ambitious but realistic mode share targets are proposed together with an effective monitoring programme as required under Objective MSSM OBJ 1.

While the LTP sits alongside the draft Joint Local Area Plan, the Office is concerned that the LTP measures have not been integrated into the draft Joint Local Area Plan.

Notwithstanding Objective MT 5 of the draft Joint Local Area Plan, having regard to RPO 6.28 of the RSES, which requires the incorporation of LTP measures into local area

plans, it is recommended that the draft Joint Local Area Plan is amended to include strong objectives and policy to support the implementation of the LTP. The draft Joint Local Area Plan should also provide clear mapping of the active travel network and implementation timeframes for the schemes to be delivered during the lifetime of the plan.

A key requirement of LTPs as outlined in section 6 of the RSES, is to set out the transport priorities for the plan area. The Office strongly welcomes the clear identification in section 6 of the LTP of both high and low priority schemes. This is crucial for prioritising measures to be progressed during the plan period. There are a number of areas however, where the Office considers that priorities should be reviewed in order to improve alignment with objectives of the draft Joint Local Area Plan.

Objective TC4 the draft Joint Local Area Plan indicates it is an objective to provide high quality public realm spaces in the town centre. In addition, the Leitrim Climate Action Plan 2024 – 2029 designates Carrick-on-Shannon as a Decarbonisation Zone and sets out a number of actions including Action DZT9 – ‘to increase pedestrianised space in Carrick-on-Shannon to encourage active travel’.

The promotion of town centre regeneration is also a key policy of government as outlined in Town Centre First, A Policy Approach for Irish Towns (2022) (Town Centre First), while the progression of the N4 bypass scheme also presents opportunities for town centre traffic calming. It is welcome therefore that the LTP includes a number of measures relating to town centre public realm improvements. The schemes however, which include CP-3, CP-4 and CP-9, are highlighted in table 6-12 and figure 6-6 of the LTP as low priority, which is inconsistent with the aforementioned policy and objectives. A review of these priorities is recommended in order to strengthen alignment with Town Centre First policy.

LTP scheme priorities should also be re-examined to ensure a strong focus on emerging development areas. The draft Joint Local Area Plan identifies opportunity sites at St Patrick’s Park and Priests Lane, and new residential lands off Cluain Ard and adjacent to St. Mary’s cemetery, where further lands are identified for social and community development. Figures 6.2 and 6.3 of the LTP however, indicate that pedestrian and cycle schemes in these areas, are generally low priority.

It is also unclear if accessibility for proposed Industrial and Enterprise use lands to the east of the town has been considered in the LTP. A review of scheme priorities to ensure a strong focus on emerging development sites is recommended. Consideration should also be given to an overlay of the emerging mobility network with land use proposals, in order to highlight priority schemes necessary to support activation of key development areas.

The LTP identifies significant issues with the town's train station relating to accessibility, bus interchange and the availability of car parking. Improving train station facilities will be essential to promoting public transport for wider regional travel and supporting the town's tourism functions. Objective MT 8 in section 6.5 of the draft Joint Local Area Plan, which seeks the expansion and improvement of train station facilities, is strongly welcomed. The LTP also includes measures to support this objective. Some of the measures though, are indicated as low priority, including those relating to provision of cycle facilities along the R368 and R370 in the vicinity of the train station, and car parking measure CP-1 – to identify off street car parking in proximity to the train station.

It is also a concern that proposed pedestrian and traffic calming measures on the approach to the Shannon bridge from the Cortober side (along the route between the train station and the town centre), are identified as low priority on figures 6.2 and 6.7 of the LTP. It is recommended that the prioritisation of these measures is reviewed in order to ensure that improvements to the accessibility and function of the train station can be progressed during the life of the plan.

Recommendation 4 – Integrated land use and transport planning

Having regard to the need to provide for sustainable transport and in particular to:

- Policies and Objectives MSSM OBJ 1, ILU POL 1, ILU POL 2, ILU POL 3, IUL POL 5, ILU OBJ 1 & ILU OBJ 2 of the Leitrim County Development Plan 2023 – 2029;
- RPO 6.27, RPO 6.28, RPO 6.29, RPO 6.30, RPO 6.31 & RPO 6.32 of the Regional Spatial and Economic Strategy for the Northern and Western Regional Assembly; and

- the Climate Action and Low Carbon Development Act 2015, as amended, mandatory target to reduce greenhouse gas emissions by 51%, and the Climate Action Plan 2024, and associated actions including the National Sustainable Mobility Policy (2022) targets to reduce vehicle kilometres travelled per year and the National Investment Framework for Transport in Ireland (2021),

the Planning Authorities are required to:

- (i) amend the draft Carrick-on-Shannon Joint Local Area Plan 2025 – 2031 (the draft Joint Local Area Plan) to incorporate the measures and proposed modal networks of the Local Transport Plan (LTP) and include clear mapping and policy support for the proposed interventions;
- (ii) amend the draft Joint Local Area Plan to include mode share targets and an effective monitoring programme; and
- (iii) review the prioritisation of LTP measures in order to strengthen alignment with draft Joint Local Area Plan objectives relating to:
 - a) Town Centre First, A Policy Approach to Irish Towns (2022) and town centre rejuvenation.
 - b) New development areas and opportunity development sites.
 - c) Improvements to train station accessibility, interchange and parking facilities.

The schemes to be prioritised for progression during the life of the plan should be listed in the draft Joint Local Area Plan.

4.2 National Roads

The delivery of the N4 bypass scheme is provided for under RPO 6.7 of the RSES (N4 Carrick-on-Shannon to Dromod). This is a critical infrastructure requirement for the town and the region and while support for it under section 6.3 of the draft Joint Local Area Plan is welcome, the Office is concerned that the scope and detail of the scheme is not reflected in the LTP or the draft Joint Local Area Plan.

In addition to the bypass, the scheme comprises demand management and active travel components as well as an urban relief road to the north east of the town. These details should be included in the LTP and draft Joint Local Area Plan in order to support scheme delivery and its integration into the transport strategy for the town. It is also noted that Transport Infrastructure Ireland's submission recommends not including land use zoning objectives underlying the N4 scheme corridor reservation. The land use zoning objectives should be amended in the draft Joint Local Area Plan to address this issue.

Recommendation 5 – National Roads

Having regard to:

- Policies and Objectives TRAN OBJ 1, TRAN OBJ 2, TRAN OBJ 3 and section 8.11.2 National Road Improvement Projects of the Leitrim County Development Plan 2023 – 2029; and
- RPO 6.7 & RPO 6.5 of the Regional Spatial and Economic Strategy for Northern and Western Regional Assembly,

the Planning Authorities are required to:

- (i) amend the draft Carrick-on Shannon Joint Local Area Plan 2025-2031 (the draft Joint Local Area Plan) to include greater clarity on the scope and detail of the N4 Carrick-on-Shannon to Dromod project and to ensure the scheme is adequately integrated into the transport plan for the town;
- (ii) revise the wording of Objective MT 4 (section 6.4 of the draft Joint Local Area Plan) to include reference to the land reservation corridors outlined on the draft Joint Local Area Plan's land use zoning maps;
- (iii) omit the proposed land use zoning objectives underlying the N4 Carrick-on-Shannon to Dromod proposed road scheme; and
- (iv) include more distinct representation of the reservation corridors on the land use zoning maps.

5. Economy and employment

The Office welcomes the approach in the Joint Local Area Plan for economic development and employment in particular the identification of 39 ha of lands in the plan area for appropriate employment development.

The Office notes that the lands zoned Industrial and Enterprise are located on the outskirts of the town, mainly to the eastern and western edges of the town. The areas identified are easily accessible to the N4. The zoning of land to the east of the town facilitates one of the key future priorities for the town of Carrick-on-Shannon as identified in the RSES which is to facilitate the sustainable development of a new regionally significant opportunity site, and is supported by policy objectives ED 1 and ED 2 of the draft Joint Local Area Plan.

Key Towns are regionally strategic employment centres of significant scale that can act as regional drivers that complement and support the higher-order urban areas within the settlement hierarchy. Further Key Towns have the potential to accommodate a significant level of growth in employment through appropriate investment in infrastructure, support services and place making initiatives. The strategy in the draft Joint Local Area Plan of identifying strategic employment land is consistent with RSES and the respective Leitrim and Roscommon County Development Plans.

6. Flood risk management

The Office welcomes the preparation of the Strategic Flood Risk Assessment (SFRA) and accompanying plan-making justification tests to inform the policies, objectives and zoning objectives of the draft Joint Local Area Plan. The Office also welcomes the indication of Flood Risk Zones A and B on the land use zoning maps for the draft Joint Local Area Plan.

However, the Office notes the submission from the Office of Public Works raises issues in respect of flood risk management, specifically:

- both Planning Authorities are advised to have full regard to the ongoing design, planning and implementation of the Carrick-On-Shannon flood relief scheme. The Joint Local Area Plan would be strengthened with the inclusion of a specific objective included to ensure that zoning or development proposals support and do not impede or prevent the progression of this scheme;

- section 3.5 of the SFRA provides a list of various Sustainable urban Drainage Systems (SuDS) techniques. The Planning Authorities are advised to identify the appropriate SuDS techniques and nature based solutions applicable to each of the Opportunity Sites;
- the flood risk zones do not take account of climate change impacting on flood extents. The potential future flood extents included in the SFRA might be shown overlaid with the land use zonings, to highlight any developments that could potentially be affected by climate change; and
- there are locations in the plan area where undeveloped lands in Flood Zones A and B have been zoned for vulnerable development inappropriate to the assessed level of flood risk. It would be appropriate to limit any development on these sites and follow the sequential approach as set out in the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) (Flood Guidelines), and therefore substitute a zoning appropriate to the level of flood risk. This applies to the following locations:
 - Bóthair Saileach/Páirc Meala (Undeveloped land zoned highly vulnerable Existing Residential in Flood Zones A and B. Currently in use as Green Space for a housing development); and
 - East of R280 / Leitrim Road (Undeveloped lands zoned Social and Community which can facilitate highly vulnerable usage such as childcare or ancillary purpose-built accommodation such as residential care).

The Office advises that the SFRA requires review and updating which will have consequential implications for the draft Joint Local Area Plan. These issues will need to be addressed in order to ensure the flood risk is managed for the draft Joint Local Area Plan in accordance with the Flood Guidelines, and consistent with national, regional and county policy and objectives.

Recommendation 6 – Flood Risk Management

Having regard to flood risk management, and in particular to:

- RPO 3.10 of the Regional Spatial Economic Strategy for the Northern and Western Regional Assembly; and

- the provisions of the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) (Flood Guidelines), as amended;

the Planning Authorities are required to:

- (i) include a specific policy objective to support the proposed Carrick-On-Shannon flood relief scheme ensuring that development proposals support and do not impede or prevent the progression of this scheme;
- (ii) include a list of relevant and applicable Sustainable Drainage Systems techniques and Nature Based Solutions for each of the Opportunity Sites;
- (iii) consider climate change impact flood zones extents; and
- (iv) omit or amend the following zoning objectives for vulnerable development in Flood Zone A or B in accordance with the provisions of the Flood Guidelines:
 - a) Bóthair Saileach/Páirc Meala (Undeveloped land zoned highly vulnerable Existing Residential in Flood Zones A and B); and
 - b) East of R280 / Leitrim Road (Undeveloped lands zoned Social and Community).

The Planning Authorities should consult with the Office of Public Works in addressing this recommendation.

7. Climate Action

Chapter 5 - Climate Action and Flood Risk of the Joint Local Area Plan deals specifically with climate action.

The Office welcomes the key objective of this part of the Joint Local Area Plan is to enable Carrick-On-Shannon transition to a low carbon and climate resilient town, with a goal on reduction in energy demand and greenhouse gas emissions, through effective mitigation and adaptation in response to climate change.

Carrick-On-Shannon is the designated Decarbonisation Zone within county Leitrim, and in general a key vision of the draft Joint Local Area Plan is the creation of a low carbon town, with a range of climate mitigation, adaptation and biodiversity measures, includes

promoting Carrick-On-Shannon as a green hub for tourism, harnessing blue infrastructure, transforming energy efficiency, promoting active travel and greener transport, encouraging green action among businesses and enhancing awareness among the community.

The above opportunities will provide a framework for the transition of Carrick-On-Shannon towards a low carbon and climate resilient settlement.

In general, the overall approach is commended, and the inclusion of a decarbonisation-specific policy objectives (CA 1 of the draft Joint Local Area Plan) is welcomed, however the policy objective is relatively high-level.

There is an opportunity for the draft Joint Local Area Plan to include more specific policy measures and actions to give effect to and complement the objectives and actions from the respective Leitrim County Council Climate Action Plan 2024-2029 and Roscommon County Council Climate Action Plan 2024-2029 which are specific to the Decarbonisation Zone.

Observation 1 – Integrating climate action

Having regard to:

- RPO 3.7 of the Regional Spatial and Economic Strategy for Northern and Western Regional Assembly;
- the Climate Action and Low Carbon Development Act 2015, as amended, mandatory target to reduce greenhouse gas emissions by 51%; and
- the Leitrim County Council Climate Action Plan 2024-2029, and the Roscommon County Council Climate Action Plan 2024-2029,

the Planning Authorities are requested to include additional and more specific climate action policy objectives in chapter 5 of the Carrick-on-Shannon Joint Local Area Plan 2025-2031 which relate to policy measures and actions in the County Council Climate Action Plans and Carrick-On-Shannon's status as a Decarbonisation Zone.

8. Implementation and Monitoring

Section 6.5 of the Local Area Plans, Guidelines for Planning Authorities (2013) states that planning authorities are encouraged to periodically review the success or otherwise of the implementation of the policies and objectives of a local area plan by effective monitoring systems such as reviewing the progress in securing the objectives of the development plan in accordance with section 15 of the Act.

The Office welcomes the inclusion of a chapter on Implementation and Monitoring in the draft Joint Local Area Plan. It is considered, however, that a more systematic approach to monitoring would better assist the Planning Authorities in implementing the key objectives / actions of the draft Joint Local Area Plan, for example by identifying lead responsibility and a timeline for implementation of actions.

This is particularly important in the context of the co-ordination of your two Planning Authorities in terms of delivering the vision for a compact and sustainable settlement as set out in the draft Joint Local Area Plan.

Guidance on monitoring and implementation is provided in chapter 10 of the Development Plans Guidelines. Further, the Newcastle West Local Area Plan 2023-2029 and the Carlow-Graiguecullen Joint Urban Local Area Plan 2024-2030 both provide examples of good practice in this area.

Observation 2 – Monitoring and implementation

Having regard to the duty and function of planning authorities under section 15(1) and 15(2) of the Planning and Development Act 2000, as amended, the Planning Authorities are requested to review the proposed provisions of the Draft Carrick-On-Shannon Joint Local Area Plan 2025-2031 (the draft Joint Local Area Plan) concerning implementation and monitoring to provide a more detailed systematic approach to monitoring the implementation of key objectives and/or actions of the draft Joint Local Area Plan.

Summary

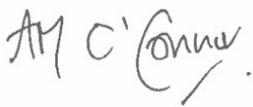
The Office requests that your authorities address the recommendations and observations outlined above. As you are aware, the report of the Chief Executives of your authorities prepared for the elected members under section 20 of the Act must summarise these recommendations and the manner in which they will be addressed.

Where your authorities decide not to comply with the recommendations of the Office, made in the draft Joint Local Area Plan and report, please outline the reasons for the decision in the Chief Executives' Report.

Please feel free to contact the staff of the Office in the context of your authority's responses to the above, which we would be happy to facilitate. Contact can be initiated through plans@opr.ie.

Is mise le meas,

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Anne Marie O'Connor

Deputy Regulator and Director of Plans Evaluations