



03 October 2024

Forward Planning Section,
Leitrim County Council,
Aras an Chontae,
Carrick-on-Shannon
Leitrim

Dear Sir/Madam

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

The Heritage Council was established as a statutory body under the Heritage Act 1995 with a Council (the Board of the body) appointed by the Minister. The Heritage Council is a prescribed body under the provisions of the Planning and Development Acts 2000-2010 and S.I. No. 600/2001 of the Planning and Development Regulations, section 28 inter alia, in accordance with its functions under Section 6 of the Heritage Act, 1995.

We seek to provide submissions on forward planning, development management, and strategic infrastructure developments as they relate to Ireland's heritage, namely built, cultural and natural heritage. We welcome the opportunity to comment on the *Draft Carrick on Shannon Joint Local Area Plan 2025-2031*.

Ireland's national heritage is defined in the Heritage Act, 1995 as including: 'monuments, archaeological objects, heritage objects, architectural heritage, flora, fauna, wildlife habitats, landscapes, seascapes, wrecks, geology, heritage gardens, and parks and inland waterways'.

National and Local Policy Context

It is important to state from the outset that the **National Planning Framework – Project Ireland 2040**, identifies "*Enhanced Amenities and Heritage*" as one of our national strategic outcomes. Within this, the NPF correctly notes that built, cultural and natural heritage has intrinsic value in defining the character of urban and rural areas, adding to their attractiveness and sense of place. National policy objectives 16, 17 and 52 in the NPF give further support to this ambition and there is a need to reflect this in LAPs.

Development Plans – Guidelines for Local Planning Authorities was prepared for county and city councils in June 2022. Within these guidelines, there are detailed requirements for local forward planning objectives. Features of special architectural, historical, or natural value are our heritage assets, and mandatory objectives under the themes of 'heritage and landscape' have been identified throughout these guidelines. There is an obligation on local authorities to ensure the inclusion of such objectives in their statutory plans.

Baill na Comhairle | Council Members

Martina Moloney (Cathaoirleach | Chairperson),
Michael Farrell, Dr. John Patrick Greene, Fionnuala May,
Deirdre McDermott, Dr. Patricia O Hare, John G.
Pierce, Sheila Pratschke, Prof. Mark Scott,
Dr. Mary Tubridy

Charity reg. no 20036867

Aras na hOidhreachta, Lana an Teampail,
Cill Chainnigh, Eire, R95 X264

Aras na hOidhreachta, Church Lane,
Kilkenny, Ireland, R95 X264

T 056 777 0777 | E mail@heritagecouncil.ie

www.heritagecouncil.ie



The 4th edition of Ireland's **National Biodiversity Action Plan (NBAP) 2023 – 2030** was published in January 2024. The NBAP states that “local authorities play a key role in biodiversity conservation through the planning system”. There are several targets identified under Outcome 2A (*The protection of existing designated areas and protected species is strengthened and conservation and restoration within the existing protected area network are enhanced, regarding designated areas and protected species*) that are relevant for local authorities in their plan making functions. However, of key importance is Outcome 3C (*Planning and development will facilitate and secure biodiversity's contributions to People*). Action Numbers 3C2 and 3C3 are especially important, whereby the objectives of the NBAP are to be aligned and integrated within the statutory land use plans. In addition, actions 1B9, 1C5 should also be key considerations for all plans.

Heritage Ireland 2030 was published in February 2022 and details a number of action points relevant for local authorities and these should be included in LAPs. Most importantly are Action 22 - *Introduce policies on supports for urban biodiversity and tree planting*; Action 26 - *Support nature-based solutions for land-use management*; and Action 37 - *Integrate heritage considerations into urban and rural regeneration to ensure that built and natural heritage objectives underpin the planning and development process and inform the 'Town Centres First' policy approach*.

The **Guidelines for Planning Authorities on Architectural Heritage Protection** were developed in 2004 and give expression to the provisions of the Planning and Development Act 2000, with regards to built heritage. Chapter 2 and 3 give detailed guidance on the role of statutory county level plans with regards to the Record of Protected Structures and Architectural Conservation Areas. The Office of the Planning Regulator has also provided guidance on **Archaeology in the Planning Process** through **Planning Leaflet 13**.

The Northern and Western **Regional Spatial & Economic Strategy 2020-2032** is the current regional plan for the counties of Roscommon and Leitrim. Whilst the RSES primarily deals with spatial planning matters at the regional level, Chapter 5 does provide policy on the environment, including natural heritage and built heritage. We would bring particular attention to RPOs 5.3 to 5.17 of this RSES.

The **Leitrim County Development Plan 2021-2027** has comprehensive sections on both heritage generally, and biodiversity. Policy NH POL 1 to NH POL 5 provide policy for designated habitats and species, while further policies exist through NH POL 06 to NH POL 10 which caters for non-designated assets and biodiversity more generally. The protection of the built environment and heritage designations are catered for through BH POL 1 to ARCH POL 5. While Chapter 9 and 10 of the **Roscommon County Development Plan 2022-2028** also provides objectives and policies for built heritage and natural heritage respectively.

These pertinent national and local policies are emphasised to provide context to our comments. Additional guidelines and policies are identified for specific sections of the draft LAP in the following paragraphs.

Baill na Comhairle | Council Members

Martina Moloney (Cathaoirleach | Chairperson),
Michael Farrell, Dr. John Patrick Greene, Fionnuala May,
Deirdre McDermott, Dr. Patricia O Hare, John G.
Pierce, Sheila Pratschke, Prof. Mark Scott,
Dr. Mary Tubridy

Charity reg. no 20036867

Aras na hOidhreachta, Lana an Teampaill,
Cill Chainnigh, Eire, R95 X264

Aras na hOidhreachta, Church Lane,
Kilkenny, Ireland, R95 X264

T 056 777 0777 | E mail@heritagecouncil.ie

www.heritagecouncil.ie



Specific comments on the Draft LAP

Chapter 1 - Introduction

The Introduction Chapter to the Plan appears to be lacking strategic overarching objectives. This may be intended. However, a vision with several strategic objectives, which should include one relating to natural and built heritage, should be included in this chapter.

Chapter 2 – Town Centre First and Regeneration

The Heritage Council welcome the intention to concentrate growth in the town centre. The Goals in Figure 2.1, particularly with regard to town centre vitality and activity, are very welcome. Many Irish towns are suffering from vacancy and dereliction, as well as car dominated streetscapes. Aims to establish more attractive streets and spaces will undoubtedly be of benefit to the historic environment of the town. The associated objectives of TC3 and TC5 are welcome. However, it is disappointing to not see existing heritage, which cannot be recreated or replicated, not specifically mentioned in either Objective TC2 and TC3. We recommend that existing heritage be drafted into these policies as one of the “inherent strengths” of the town.

Progressive placemaking has the potential to increase the attractiveness of all towns. There are many attractive buildings in the town, with Bridge Street and Main Street being good examples of the linear Irish townscape. Protecting this heritage along with ensuring compact growth are not conflicting objectives but can be achieved through a heritage led design approach that should be reflected in policy. Accordingly, we recommend a new policy in this placemaking section that specifically supports heritage led design and placemaking.

Generally, linear terraced houses have a relatively efficient high density-high coverage land use form that accommodates family homes. The more sustainable aspects of this design can be combined with more modern development typologies to achieve efficient use of land in settlements such as Carrick on Shannon. We encourage this LAP to accommodate such development forms and encourage this typology in inner core development sites. *The Sustainable Residential and Compact Settlement Guidelines 2024* are also very important in this regard. The guidelines note the importance of responsive placemaking for existing heritage as well as expectations for the application of density and development management standards; the flexible imposition of the latter is needed for inner core sites. A new policy is required in this section that notes these guidelines and reflects our points in this paragraph.

Policies TC6 and TC7 are also welcomed. Active land activation is needed not just to tackle vacancy but also to ensure that brownfield sites are preferred for development in a sequential approach. The identification of opportunity sites is particularly important in this regard. This is the specificity that is needed from LAPs and the Heritage Council welcome the effort made in the plan to identify such sites. More importantly it does appear

Baill na Comhairle | Council Members

Martina Moloney (Cathaoirleach | Chairperson),
Michael Farrell, Dr. John Patrick Greene, Fionnuala May,
Deirdre McDermott, Dr. Patricia O Hare, John G.
Pierce, Sheila Pratschke, Prof. Mark Scott,
Dr. Mary Tubridy

Charity reg. no 20036867

Aras na hOidhreachta, Lana an Teampail,
Cill Chainnigh, Eire, R95 X264

Aras na hOidhreachta, Church Lane,
Kilkenny, Ireland, R95 X264

T 056 777 0777 | E mail@heritagecouncil.ie

www.heritagecouncil.ie



that the development potential box for each site aims to identify the environmental constraints that need to be considered. We recommend here that natural features i.e. hedgerows, tree stands, and any built and cultural heritage assets, both on and adjacent to the site be fully identified, with key development considerations included for any such assets. As an example, Opportunity Site 7 clearly has hedgerows and mature trees and should be factored into the approach to site design.

Chapter 5 – Climate Action and Flood Risk

Climate Action is a thread that should run through an entire forward plan. Given the impacts that climate change is having, and is expected to have on our natural heritage, the Heritage Council strongly support policies in the planning system that both reduce emissions at source and ensure adaptation to the worst impacts of climate change.

The Heritage Council believe that at the level of first principles, together with the reuse of the embedded carbon in existing buildings, that ensuring land use patterns and mobility are integrated, is the most important role the planning system has for addressing climate change. In overarching terms, we wish to:

- Ensure transport and land use are strongly integrated, as per national policy, and our settlement patterns are conducive to public transport roll out and walking and cycling
- Ensure efficient use of land to reduce the built environment footprint
- Avoid sites that have high ecological potential, informed by habitat mapping.
- Ensure that existing brownfield sites and well-located sites within the urban boundary are preferred in a sequential approach to development including any sites next to the train station.

Some of these points are provided for in policy terms (Objectives CA1 to CA10). We expect that each relevant chapter will address such aspirations in their respective policy objectives. We therefore recommend that the above points be integrated where needed in the respective chapters that deal with movement, heritage, compact growth, and place making and design.

Chapter 8 – Built and Natural Heritage

The Heritage Council has particular interest in this chapter. The introduction to this chapter and the subsequent headings gives good detail on the architectural and archaeological baseline in the town, including the Carrick on Shannon Architectural Conservation Area (ACA).

The following amendments are recommended:

BNH1 - Maintain, conserve and protect the architectural quality, character and scale of the Carrick-on-Shannon Architectural Conservation Area and to require new

Baill na Comhairle | Council Members

Martina Moloney (Cathaoirleach | Chairperson),
Michael Farrell, Dr. John Patrick Greene, Fionnuala May,
Deirdre McDermott, Dr. Patricia O Hare, John G.
Pierce, Sheila Pratschke, Prof. Mark Scott,
Dr. Mary Tubridy

Charity reg. no 20036867

Aras na hOidhreachta, Lana an Teampaill,
Cill Chainnigh, Eire, R95 X264

Aras na hOidhreachta, Church Lane,
Kilkenny, Ireland, R95 X264

T 056 777 0777 | E mail@heritagecouncil.ie

www.heritagecouncil.ie



*developments within or adjacent to the Architectural Conservation Area to **respond positively to the existing character** ~~respect the context~~ of the area.*

*BNH2 - Encourage the rehabilitation, renovation, climate proofing and re-use of protected structures and **non designated** vernacular buildings (including **those listed** in the National Inventory of Architectural Heritage) within the Plan area.*

The section on natural heritage does not account for local ecological assets. The recognition of protected species is welcome. However there needs to be a greater emphasis on locally important biodiversity sites and the need to retain natural features. The section on green infrastructure is noted. However, the ecological potential of green infrastructure is very much dependent on the design and maintenance regimes of such infrastructure.

It is important to note at this point that the Heritage Council aspires to a universal locally important biodiversity site identification process that ensures that policies for protecting local ecological networks in county development plans and local area plans have a supporting evidence base. This aspiration is couched within the context of ensuring that forwards plans can comply with the development plan guidelines for local authorities insofar as under Section 9.2.4 Nature Conservation, they state that:

*“While protected areas cover a significant part of the country, **the majority of the country lies outside of this network**. There are many other sites which are of local importance for flora and fauna. Local authorities have an important role to play in preventing the loss of such sites and the species which rely upon them for their survival. **Development plans should identify such sites of local ecological importance** and endeavour to secure their protection. Any development on or near such sites should avoid any significant adverse impact on the features for which the site is considered to be of local importance”*

The areas along the Shannon, the linear woodland adjacent to the Summerhill Road, and the woodland/scrub area adjacent to the Oaklands housing estate appear to provide important habitats and should be recognised as such. Such ecological features will then be the most relevant biodiversity considerations for objectives BNH6 and BNH9. In the case of the latter policy, the intention is good regarding swift boxes, and green roofs. However, these are essentially mitigation measures. The protection of existing ecological features, such as those noted above, should be the key considerations for the development management process. The following amendments to policies are recommended:

*~~BNH6 Encourage and~~ **Identify and protect existing ecological assets, and enhance, where appropriate, the provision of biodiversity features in urban areas through the development management process, including in pre-application discussions, and in Local Authority own developments.***

*~~BNH9 Highlight in the course of pre-planning discussions, where appropriate, the need to identify, protect and~~ **Encourage and enhance ecological features by making provision***

Baill na Comhairle | Council Members

Martina Moloney (Cathaoirleach | Chairperson),
Michael Farrell, Dr. John Patrick Greene, Fionnuala May,
Deirdre McDermott, Dr. Patricia O Hare, John G.
Pierce, Sheila Pratschke, Prof. Mark Scott,
Dr. Mary Tubridy

Charity reg. no 20036867

Aras na hOidhreachta, Lana an Teampaill,
Cill Chainnigh, Eire, R95 X264

Aras na hOidhreachta, Church Lane,
Kilkenny, Ireland, R95 X264

T 056 777 0777 | E mail@heritagecouncil.ie

www.heritagecouncil.ie



for local biodiversity (e.g. through provision of swift boxes, bat roost sites, green roofs, etc) as part of development management proposals.

General site design policies should also seek to retain natural features. There is often needless removal of mature trees and hedgerows, of considerable character and ecological value, as part of site works to 'tidy' the site before construction commences. Such features may not be worthy of county/local level biodiversity importance but would be important natural features nonetheless in terms of biodiversity and urban greening. In this regard opportunity sites within the town or any phased greenfield release should have stringent design standards for retention of natural features. The Heritage Council also encourage greater use of Tree Preservation Orders.

Strategic Environmental Assessment/ Appropriate Assessment

There will be an SEA and Appropriate Assessment required for the LAP. There is a need to ensure that all future policies drafted are individually assessed against the SEA objectives, when the time comes. The Heritage Council recommends that the SEA/AA guidance prepared by the Office of the Planning Regulator (OPR) be consulted when preparing the SEA for the LAP.

Conclusion

The Heritage Council strongly encourage both Leitrim and Roscommon County Councils to continue to acknowledge the primacy of Carrick on Shannon's heritage resource. The built and natural heritage of the town should be the focus for guiding any future strategy. We recommend that this important heritage and character continues to guide a sustainable future development trajectory for the town and its environs.

I trust these comments will be considered carefully as you progress the Carrick on Shannon Local Area Plan 2025-2031.

Baill na Comhairle | Council Members

Martina Moloney (Cathaoirleach | Chairperson),
Michael Farrell, Dr. John Patrick Greene, Fionnuala May,
Deirdre McDermott, Dr. Patricia O Hare, John G.
Pierce, Sheila Pratschke, Prof. Mark Scott,
Dr. Mary Tubridy

Charity reg. no 20036867

Aras na hOidhreachta, Lana an Teampaill,
Cill Chainnigh, Eire, R95 X264

Aras na hOidhreachta, Church Lane,
Kilkenny, Ireland, R95 X264

T 056 777 0777 | E mail@heritagecouncil.ie

www.heritagecouncil.ie