



Oifig an
Rialaitheora Pleanála
Office of the
Planning Regulator

6th July 2026

Forward Planning Section,
Roscommon County Council,
Aras an Chontae,
Roscommon,
Co. Roscommon,
F42 VR98.

**Re: Proposed Variation No. 1 to the Roscommon County Development Plan
2022-2028**

A chara,

Thank you for your authority's work in preparing the Proposed Variation No. 1
(proposed Variation) to the Roscommon County Development Plan 2022-2028
(Development Plan).

As Roscommon County Council (Planning Authority) is aware, a key function of the
Office of the Planning Regulator (Office) is to evaluate and assess statutory plans to
ensure consistency with legislative requirements and national and regional planning
policy. The Office has undertaken this evaluation and assessment pursuant to Part 3
of the Planning and Development Act 2024 (Act) and its functions under section 546,
and this submission sets out the outcome.

In this context, the submission includes recommendations and observations.
Recommendations arise where the Office identifies clear inconsistencies with
legislative provisions or policy frameworks and are intended to be addressed to
ensure compliance. Observations highlight areas where further clarification,
justification, or refinement would strengthen the plan. The submission may also
include advice to support the proper planning and sustainable development of the
area.

Following adoption of the Variation, the Office will carry out a further assessment under section 63 of the Act.

1. Overview

The proposed Variation introduces a number of changes to the Development Plan to support the implementation of the NPF Implementation: Housing Growth Requirements (2025) (Housing Growth Guidelines). These include:

- core strategy updates and associated revisions;
- updated referencing to the section 28 Ministerial Guidelines in appendix 1 of the Development Plan;
- a Settlement Plan for Roscommon Town (replacing the current Roscommon Town Local Area Plan 2024-2030);
- a new Settlement Plan for Boyle;
- a Land Use Zoning Strategy for Cortober, adjoining Carrick-on-Shannon;
- updated land use zoning maps and rezonings within Ballaghaderreen, Castlerea, Elphin and Strokestown;
- proposed rezoning based on the Residential Zoned Land Tax (RZLT) process;
- addition of a Settlement Capacity Audit (SCA) to appendix 9, Volume II of the Development Plan (in conjunction with the clarification of the superseded status of the Planning and Infrastructure Assessment in appendix 5 of Volume I); and
- minor technical amendment to content referencing to content referencing the N4 road project in chapter 7.

The Office notes the inclusion of a revised core strategy that clearly sets out the distribution of growth across Roscommon Town and the county's other settlements. This approach provides for an estimated additional 31 hectares of residential land, bringing the total residential land supply to 99 hectares. Collectively, these lands have the potential to deliver approximately 3,012 residential units, including a further 1,286 homes. The Office commends this approach and is satisfied that it provides a

strong basis for supporting compact growth in alignment with national and regional policy.

The Office also welcomes the inclusion of Long Term Strategic and Sustainable Development sites within the proposed Variation, including the lands identified at Roscommon Town under proposed Amendment No. 59 (vii). The acknowledgement that these lands will be developed over a period extending beyond a single development plan cycle is consistent with the Development Plans, Guidelines for Planning Authorities (2022) and the Housing Growth Guidelines. Overall, this approach should support a sustainable pipeline of housing delivery in Roscommon Town while facilitating growth across the wider settlement hierarchy.

The Office particularly welcomes the Planning Authority's comprehensive SCA and its robust methodology. Notwithstanding the above, further clarification is required regarding the scale, density and potential yield of the proposed zonings as presented in the SCA. In addition, updated information on water and wastewater infrastructure would strengthen the evidence base underpinning the proposed Variation.

The Office further welcomes the recognition of the growth potential of Athlone, including proposed Amendment No. 28, which commits to the preparation of a future cross-boundary joint strategy in collaboration with Westmeath County Council, having regard to the requirements of the Act. In this regard, the Office recommends that the Planning Authority also commits to preparing a Local Transport Plan (LTP) to accompany the joint strategy and to ensure that any relevant transport policies and objectives arising from this process are incorporated into the future coordinated area plan for Athlone.

In relation to transport more broadly, the Office recommends that a commitment be included to prepare an LTP for Roscommon Town. The Office further recommends in relation to the current draft LTP for Boyle, once published, that any actions arising from both assessments be fully integrated into the respective settlement plans for Roscommon Town and Boyle.

The Office notes and welcomes the Planning Authority's continued commitment to the application of The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) (Flood Guidelines). However, the Office has concerns

regarding the proposed rezoning of lands in Cortober from Open Space and Amenity to Community Infrastructure, given the potential presence of Flood Zones A and B. This matter should be addressed. The Office also notes the absence of references to the Flood Relief Schemes for Roscommon Town and considers that related objectives for Roscommon Town and Boyle should be incorporated into the proposed Variation. In addition, the Office recommends strengthening the Plan Making Justification Test for Boyle town centre and giving further consideration to undeveloped lands adjoining proposed Flood Relief Scheme areas that may be affected by Drainage Districts and Benefiting Lands.

Finally, the Office notes that the proposed Variation includes land-use zoning changes arising from the RZLT process. This includes proposed Amendment No. 59 (vi) in Roscommon Town, which proposes to rezone lands from New Residential to Agriculture. While the Office raises no objection to this proposal at this time, it considers that, given the site's location, its future residential potential should be reviewed again as part of the emerging Development Plan preparation process.

The following recommendations and observations set out below are intended to support the Planning Authority in further strengthening the proposed Variation and ensuring its effective implementation:

Subject	Recommendation	Observation
Implementation of the housing growth requirements	-	Observation 1
Flood risk management	Recommendation 1	Observation 2
Integration of transportation and land use planning	Recommendation 2	-

2. Implementation of housing growth requirements

The Office notes that in the majority of cases the Planning Authority has identified well located and proportionately scaled residential zoning changes within or on the edges of the existing settlement boundaries of settlements within the county. This approach is welcomed and accepted supporting the principle of compact growth.

Section 2.4 of the Housing Growth Guidelines requires that planning authorities should undertake an SCA to identify zoned serviced/serviceable lands with residential development potential, specifying enabling infrastructure for example wastewater network or treatment infrastructure, energy infrastructure, roads or public transport capacity and in the case of enabling social infrastructure, school provision and community facilities.

While the Office acknowledges that a detailed SCA has been prepared as part of the proposed Variation at Amendment No. 97, it is noted that some specific information has not been provided within the SCA, including site area (ha) of proposed zonings, relevant density of each zoning and potential residential yield (units).

The Office also notes Uisce Éireann's (UÉ) submission and detailed assessment of proposed residential zonings across the settlement plans. In light of this advice, a number of residential zoning assessments in Roscommon Town, Boyle and Castlerea currently scored as '1' in the SCA should be revised to '2', reflecting the requirement for more extensive off-site infrastructure works. The Office therefore recommends that the Planning Authority updates the SCA to reflect UÉ's findings.

Observation 1 - Implementation of the Housing Growth Guidelines - Settlement Capacity Audit

Having regard to and having considered:

- the Development Plans, Guidelines for Planning Authorities (2022);
- the NPF Implementation: Housing Growth Requirements (2025) (Housing Growth Guidelines), including Policy and Objectives 1 and 2, and section 2.4 to incorporate the objectives of the Housing Growth Guidelines into development plans;
- NPO 43 of the NPF to priorities the provision of new homes at locations that can support sustainable development; and
- NPOs 101, 102 and 103 of the NPF to consider the serviceability of land zoned for development,

the Planning Authority is advised to:

- (i) update the Settlement Capacity Audit (SCA) presented as proposed Amendment No. 97 across all levels of the Roscommon County settlement hierarchy where new residential zonings are proposed, including detailing the area (ha) of each residential zoning, density to be applied to each zoning and the potential yield of each zoning (units); and
- (ii) update the water and waste capacity elements of the SCA to reflect Uisce Éireann's advice to all settlements including Roscommon Town, Boyle and Castlerea.

3. Food risk management

The Office has concerns regarding Amendment No. 58, which proposes to rezone lands in Cortober from Open Space and Amenity to Community Infrastructure. As the Strategic Flood Risk Assessment (SFRA) indicates that this site is at risk of flood, and the Office of Public Works has identified seasonal flood extents within the area, the Office recommends that the Planning Authority applies the sequential approach in accordance with the Flood Guidelines. Given that Community Infrastructure zoning may permit more vulnerable uses, the zoning should be refined to ensure that only water-compatible uses are permitted within Flood Zone A and only less vulnerable or water-compatible uses within Flood Zone B.

The Office notes that the Roscommon Town Flood Relief Scheme is not fully examined in either the SFRA or the Roscommon Town Settlement Plan. Similarly, while the proposed Boyle Flood Relief Scheme is referenced in the SFRA, it has not been incorporated as an objective within the Boyle Settlement Plan. Although flood zoning remains unchanged by existing or proposed flood defences, future development should not prejudice the delivery of these schemes. The Office therefore recommends that this matter be addressed.

The Office also notes the presence of an Arterial Drainage Channel in Boyle and Drainage Districts and Benefiting Lands in Roscommon Town. The Planning Authority should ensure that access for the maintenance of these drainage assets is protected. In addition, as benefiting lands may be susceptible to flooding, site-specific flood risk assessments may be required for development proposals in their vicinity.

In light of the above, the Office considers that the Plan Making Justification Test for Boyle Town Centre should be strengthened to fully account for the proposed Flood Relief Scheme and residual flood risk. Particular attention should be given to a large undeveloped Town Centre site adjoining the proposed scheme to ensure that future development does not compromise its delivery. The Office therefore recommends that the site be reviewed and consideration given to zoning it for water-compatible uses only.

The Office further advises that the proposed Variation should promote nature-based solutions to reduce surface water runoff while delivering wider benefits for water quality and biodiversity. The SFRA should provide guidance on the suitability of Sustainable urban Drainage Systems for key development sites and identify opportunities for integrated, area-based green infrastructure solutions rather than relying solely on site-by-site measures.

Recommendation 1 - Flood Risk Management

Having regard to flood risk management, and having considered the following:

- NPO 78 of the NPF to avoid inappropriate development in areas at risk of flooding that do not pass the Plan Making Justification Test;
- RPO 3.10 of the RSES; and
- the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009),

the Office recommends that the Planning Authority:

- (i) reviews and omits Amendment No. 58, lands at Cortober, from Open Space and Amenity to Community Infrastructure on parts of the land which are located in Flood Zone A and restrict zoning to water compatible less vulnerable type zoning on lands located in Flood Zone B;
- (ii) includes reference to the Flood Relief Schemes for Roscommon Town in the Strategic Flood Risk Assessment (SFRA);

- (iii) integrates the conclusions of the SFRA into the Roscommon Town and Boyle settlement plans regarding Flood Relief Schemes with the inclusion of a specific objective;
- (iv) reviews the Plan Making Justification Test (Justification Test) for Boyle Town Centre to include reference to the Flood Relief Scheme; and
- (v) identifies any residual risk in the Justification Test for Boyle Town Centre and takes a precautionary approach in the Town Core and review zonings including any undeveloped adjoining lands to take account of the Flood Relief scheme to water compatible zonings where necessary.

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

Observation 2 - Flood Risk Management

Having regard to flood risk management, and having considered the following:

- NPO 77 of the NPF to integrate sustainable water management solutions and nature-based solutions;
- RPO 3.10 of the RSES; and
- the Planning system and Flood Risk Management Guidelines for Planning Authorities (2009),

the Planning Authority is advised to:

- (i) amend the Strategic Flood Risk Assessment to incorporate an integrated and area-based provision of Sustainable urban Drainage Systems and green infrastructure related to the proposed rezoned lands where appropriate in order to avoid reliance on individual site-by-site solutions;
- (ii) review the SFRA and provide a map which incorporates past flood events including reference to a flood event to the NW corner of New Residential Site 5 in Boyle; and

- (iii) ensure access arrangements are preserved for maintenance and to carry out site specific flood risk assessments where necessary on sites adjoining Drainage Districts and Benefiting Lands in Roscommon Town and Arterial Drainage Schemes in Boyle.

4. Integrated transport and land use planning

The Office has concerns regarding the lack of integrated transport planning for the county's higher-order settlements as part of this proposed Variation. While the Office notes that the Planning Authority has recently undertaken transport-related studies for Roscommon Town, these have not been published or referenced in the proposed Variation. The Office therefore recommends that the Planning Authority commits to the preparation of an LTP for Roscommon Town and incorporates its findings and supporting objectives into the Roscommon Town Settlement Plan.

Similarly, the Office notes that the recently published draft LTP for Boyle has not been reflected in the proposed Variation, nor has any commitment been made to incorporate the recommendations arising from the consultation process. The Office notes that our recent submission to the draft Boyle LTP consultation highlighted the need to incorporate this into future plans and variations for the area.

In addition, while the proposed Variation commits to the preparation of a future coordinated area plan for Athlone, it does not provide for the preparation of a supporting LTP. The Office recommends that this commitment be included.

Overall, the Office recommends that, as part of the review and preparation of the next Development Plan, the Planning Authority prepares a dedicated Transport Strategy Statement and a supporting framework of transport policies and objectives to ensure that future growth is aligned with overall development strategy of the next Development Plan.

Recommendation 2 - Integration of transport and land use planning

Having regard to the need to ensure the integration of land use and sustainable transportation, and having considered the following:

- NPO 107 of the NPF and NSO 5 of the NPF to reduce car usage and increase the number of journeys taken by sustainable modes;
- NPO 93 of the NPF to improve air quality through integrated land use and spatial planning;
- RPO 6.19 of the RSES to reduce dependency on fossil fuel powered vehicles;
- RPO 6.26 of the RSES to prepare and implement local transport plans which shall encourage a travel mode shift from private vehicular use towards sustainable travel modes of walking, cycling and use of public transport; and
- the Climate Action and Low Carbon Development Act 2015, as amended, mandatory target to reduce greenhouse gas emissions by 51%, the Climate Action Plan 2025 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 Ireland (2021),

the Office recommends that the Planning Authority:

- (i) amends Policy Amendment No. 29 to include reference to preparation of a Local Transport Plan for Roscommon Town;
- (ii) amends Policy Amendment No. 31 to include reference and integration of the draft Local Transport Plan for Boyle; and
- (iii) amends Policy Amendment No. 28 to include reference to the preparation of a local transport plan to inform the Joint Plan/Strategy for future development of Athlone in collaboration with Westmeath County Council, NWRA and EMRA having regard to the new legislative provision of the Planning and Development Act 2024.

5. Summary

The Office requests that the Planning Authority addresses the recommendations and observations set out above.

As part of this process, the Chief Executive's report to the elected members, prepared under section 58(11) of the Act should summarise the Office's recommendations and outline how it is proposed to address them.

Following adoption of the Variation, the Planning Authority is required to:

- provide the Office with a copy of the adopted Variation, together with any submissions received from the Minister, regional assemblies, and the National Transport Authority during the plan preparation process within **one week** of adoption;
- inform the Office, **as soon as practicable**, where it decides not to comply with a recommendation, including the reasons for this decision;
- publish notice of the Variation within **one week** of adoption, confirming that the Development Plan as varied will be available for inspection (online and at a specified location) no later than **five weeks** after adoption.

The Office looks forward to continued constructive engagement with the Planning Authority. If further clarification or discussion would be helpful, the Office would be pleased to assist and can be contacted at plans@opr.ie.

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Anne Marie O'Connor

Deputy Regulator and Director of Planning Policy Implementation

Designated Public Official under the Regulation of Lobbying Act 2015