



Oifig an
Rialaitheora Pleanála
Office of the
Planning Regulator

29th July 2022

Planning Department
Roscommon County Council
Aras on Chontae
Roscommon
F42 VR98

Re: Issues Paper for the Roscommon Town Local Area Plan 2023 - 2029

A chara,

Thank you for your authority's work in preparing the Issues Paper to inform the preparation of the Roscommon Town Local Area Plan 2023-2029 (the LAP). The LAP will replace the Roscommon Town Local Area Plan 2014 - 2020, which is the current statutory LAP for the town.

The Office welcomes the timely commencement of the review of the current LAP in view of the recent adoption of the Roscommon County Development Plan 2022 – 2028 (the Development Plan) and core strategy policy objective CS 2.11 to prepare a LAP for Roscommon Town.

In accordance with the provisions of section 31AO of the Planning and Development Act 2000, as amended (the Act), the Office is obliged to evaluate and assess local area plans in the context of certain statutory parameters including:

- Matters generally within the scope of section 19;
- Consistency with the objectives of the Roscommon County Development Plan including its core strategy, and the Regional Spatial and Economic Strategy for the Northern and Western Regional Assembly (the RSES);
- Consistency with the transport strategy of the National Transport Authority, where applicable;
- Ministerial guidelines made under section 28;
- Ministerial policy directives issued under section 29; and

- Such other matters as the Minister may prescribe under section 262 or otherwise prescribe.

The Issues Paper is structured around eight key themes including, amongst others, population and housing, town centre and regeneration, and sustainable transport.

The Office considers these themes are generally appropriate to help focus the public's attention on issues that are important for developing a LAP that is consistent with the objectives in the Development Plan and RSES.

The Office has set out some broad issues for your authority to consider in formulating the draft LAP under the following eight themes:

1. [Regional Spatial and Economic Strategy](#)
2. [Housing allocation and compact growth](#)
3. [Regeneration and Development](#)
4. [Economic Development and Employment](#)
5. [Infrastructure and Transport](#)
6. [Climate action and Flood Risk Management](#)
7. [Strategic Environmental Assessment and Appropriate Assessment](#)
8. [Other / procedural issues](#)

These observations are offered without prejudice to any observations and recommendations as may be forthcoming from the Office at future stages of the plan-making process and do not affect the obligation on the planning authority to comply with the relevant legislative requirements, or to be consistent with the fullness of the detailed policy context of the higher order plans and strategies and Ministerial guidelines.

1. Regional Spatial and Economic Strategy

Section 20(5) of the Act requires the LAP to be consistent with the objectives of the Development Plan and any RSES applying to the area of the plan.

The provisions of the RSES that are relevant to County Roscommon have generally been translated into the Development Plan, including its core strategy. Therefore in ensuring consistency with the Development Plan, the planning authority can ensure that the LAP is generally consistent with the RSES.

The Office would suggest that in aligning with the RSES, the LAP may focus, in particular, on qualitative issues, taking due account of the strategic vision and five growth ambitions of the RSES, the key future priorities for Roscommon Town in addition to compliance with the relevant regional policy objectives (RPOs).

In respect of the key future priorities on pages 134 and 135 of the RSES, the Office notes the emphasis placed on the delivery of residential growth in a more compact form within the existing built-up core area and ensuring the availability of suitably zoned and serviced land to support further employment generation. In this regard, reference is made to various opportunity sites / locations including in the vicinity of Circular Road, built heritage opportunities and on lands fronting the N60 (Racecourse Road).

The following RPOs, amongst others, are of particular relevance to Roscommon Town:

- RPO 3.1 - Develop urban places of regional-scale through:
 - Delivering significant compact growth in Key Towns; and
 - Developing derelict and underutilised sites, with an initial focus within town cores
- RPO 6.27 - The Assembly supports the collaborative preparation of Local Transport Plans led by local authorities in conjunction with the NTA and other stakeholders, based on Area Based Transport Assessment (ABTA) guidance and alignment with environmental policy, including for Roscommon Town
- RPO 4.9 - To ensure provision is made for the expansion in accommodation, and facilities within key destination towns

- RPO 4.11 - To upgrade Public Transport infrastructural facilities in Destination Towns, including the provision of Transport Hubs/Links, and additional accommodation
- RPO 6.8 – list of priority projects to be delivered to an appropriate level of service in the medium-term includes N61 Athlone to Boyle improvement

The LAP should also consider practical implementation issues and measures that can best be promoted via the policies and objectives of the LAP.

2. Housing allocation and compact growth

Roscommon is one of eight Key Towns in the region with a target for a 30% uplift of its 2016 population of 5,900.

The Development Plan has responded in an appropriate manner by directing a significant proportion of the county's assigned population growth to Roscommon Town thereby enabling the creation of a critical mass for the provision of increased services, facilities, and employment opportunities.¹

The above is further reflected in the Development Plan's core strategy allocation of 600 residential units to Roscommon Town over the 2022 – 2028 plan period with a target to deliver 180 of the required new homes on brownfield / infill sites in the town.

The Office notes that section 2.3.1 of the current LAP provides for a population increase of 845 persons over the 2014 – 2020 period and a requirement for 352 housing units and 26.4 hectares of residential land.

The Office notes that much of the lands zoned for New Residential in the current LAP appear to be still undeveloped and should be reviewed in terms of their suitability to deliver on Roscommon Town's housing supply target of 600 units² for the 2022 – 2028 development plan period and requirements for compact growth³ under RPO 3.2.

¹ Strategic Aim 3 from Table 1.1 of the Roscommon County Development Plan 2028 - 2028

² Table 2.2 – Core Strategy Allocations in the Roscommon County Development Plan 2022 - 2028

³ Table 2.2 (Core Strategy Allocations) targets 180 units to be delivered on infill / brownfield lands

The Office notes that the current LAP also contains relatively large areas of Strategic Residential Reserve lands at peripheral locations which should also be reviewed in terms of their suitability to deliver compact growth and sequential development over the longer term.

The Office also notes that the current LAP has an extensive plan boundary which includes lands zoned Greenbelt and Transitional Agriculture. In this regard, the preparation of a new LAP provides an opportunity to review and refine the LAP boundary which should also include a review of Map 15 - Vacant Units, Unfinished Housing Estates & Permitted Development.

The Office notes the provisions under section 19(2)(b) of the Act, which provides that the LAP shall consist of a written statement and a plan or plans, which may include objectives for the zoning of land. The Office would caution against the introduction of any land use zoning objectives that would conflict with the core strategy and the housing supply target for the settlement, or with objectives for compact growth under the RPO 3.2.

3. Regeneration and Development

The Office notes that the RSES makes reference to the high commercial vacancy rates in the town.

In this regard, the Office welcomes the emphasis on town centre and regeneration in the Issues Paper and agrees with the statement *'...there is a need to build on the recent work done in renewing the town centre, in order to ensure that it thrives as a place at the heart of community life and that its attractiveness as the focal point of the town continues to be strengthened.'*

The RSES makes reference to a number of opportunity sites to support town centre regeneration. These opportunity sites and others should be clearly identified in the forthcoming LAP including assessment of any flood risk and specific implementation actions required to unlock their potential.

This may include a range of proactive land activation measures, which may include the use of compulsory purchase and derelict site orders.

The planning authority will be aware of the recently announced Croí Cónaithe (Towns) Fund which will initially focus on supporting refurbishment of vacant homes in regional towns and should be suitably promoted in the forthcoming LAP.

The planning authority is advised to provide, through the LAP, for monitoring and evaluation of implementation of clear and measurable targets for regeneration and brownfield development.

4. Economic Development & Employment

The office welcomes the focus in the Issues Paper on promoting economic development of a suitable scale.

Roscommon Town's ratio of jobs to resident workers of 1.772⁴ is significantly above the average for settlements in the Northern and Western Regional Assembly area and provides a strong basis to *'Support the continued growth and sustainable development of Roscommon, to act as a growth driver in the region and to fulfil its role as a Key Town and to function as the County Town'* (Core Strategy policy objective CS 2.10).

In respect of the land use implications to support the above policy objective, it will be important that the planning authority takes an integrated approach for land use and transportation for employment development to ensure that the need to travel by car is reduced or minimised.

In respect of retail development, the planning authority is reminded to take account of the town centre health check assessment including required key actions from the Retail Strategy prepared for the Development Plan.

5. Infrastructure and Transport

The Office notes that Appendix 4 of the Development Plan confirms that Roscommon Town has adequate wastewater treatment capacity to cater for anticipated growth over the Development Plan period of 2022 – 2028. Specifically,

⁴ Page 172 of the National Planning Framework – Project Ireland 2040

the wastewater treatment plant has capacity for approximately 9,550 Population Equivalent.

The planning authority is requested to prepare an infrastructure capacity assessment to inform land use zonings in the LAP in accordance with the methodology set out in Appendix 3 of the *National Planning Framework Project Ireland 2040*.

In respect of section 10(2)(n) of the Act and the promotion of sustainable settlement and transportation strategies, the Office supports the approach outlined in the Issues Paper to ‘...*zone lands for future development at appropriate locations which can be served by more sustainable modes of transport, with reduced car dependency and greater accessibility by alternative modes, including public transport and walking and cycling networks.*’

The Office notes that it is a policy objective (ITC 7.31) of the Development Plan to prepare a Local Transport Plan (LTP) for Roscommon Town based on the Area Based Transport Assessment guidance of the National Transport Authority (NTA) and Transport Infrastructure Ireland (TII).

The Office also notes that the Roads and Transportation Maps 5a and 5b in the current LAP include a number indicative link roads / distributor roads around the periphery of the town. The need for these road objectives in terms of promoting sustainable transport should be reviewed as part of the preparation of the LTP and in consultation with the NTA.

Consistent with RPO 6.28, the Office advises the planning authority to translate key findings and practical implementation actions from the LTP into the final LAP. The planning authority’s attention is drawn to the approach used by Kildare County Council in the preparation of the Athy Local Area Plan.

Commitment to the proactive implementation of the *Design Manual for Urban Roads and Streets* (revised 2019) in the LAP, will also assist sustainable and active transport modes, in addition to improvement of the street environment and the overall quality of life for the local community.

6. Climate Action and Flood Risk Management

The Office welcomes the emphasis given to climate change in the Issues Paper and endorses the statement:

‘...The Local Area Plan will be prepared against the backdrop of the on-going need to address climate change. It will also build on Roscommon County Council’s selection of Roscommon town as the first Decarbonisation Zone in the county, which will serve as an exemplar model for best practice in the context of decarbonisation, green infrastructure and energy efficiency.’

Effective spatial policies need to be implemented to meet travel demand in a manner that avoids congestion, reduces the need to travel and limits greenhouse gas emissions. In this regard, it is important that the preparation of the LTP occurs in tandem with the preparation of the LAP to ensure that sustainable transport actions and solutions are fully integrated into the LAP as outlined above.

The planning authority will be aware of the need to prepare a Strategic Flood Risk Assessment (SFRA) as part of the forthcoming draft LAP, consistent with The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009).

Under section 4.23 of these Guidelines, where a planning authority is considering (in the plan) the future development of areas at risk of flooding, that would generally be inappropriate under the sequential approach (section 3.2), the planning authority must be satisfied that it can clearly demonstrate on a solid evidence base that the zoning will satisfy the Justification Test for the plan making stage (Box 4.1).

It is not sufficient that a justification test is left solely to be undertaken at a planning application stage. Your authority’s attention is also drawn to the *Department of Environment, Community and Local Government Circular PL 2/2014* which clarifies that the application of the justification test also applies to existing developed areas of towns and cities located in Flood Zone A and B.

Further advice in relation to the above and other matters relating to the SFRA can be obtained from the Office of Public Works (OPW), and the Office would advise direct consultation with the OPW in advance of the publication of the draft LAP.

The Office would also advise that flood maps should be overlaid on proposed zoning maps to provide clarity and transparency for members of the public.

Regarding climate adaption, the Office would like to draw the planning authority's attention to *Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas, Water Sensitive Urban Design, Best Practice Interim Guidance Document* (2021).

7. Strategic Environmental Assessment and Appropriate Assessment

The Office notes the intent of the planning authority to undertake Strategic Environmental Assessment and Appropriate Assessment as part of the LAP.

The Habitats Directive Assessment of plans or projects as outlined in Article 6 (3) and (4) of the *European Communities (1992) Council Directive 92/43/EEC* on the conservation of natural habitats require that a Screening for Appropriate Assessment is prepared for the LAP.

If it is concluded that likely significant effects on areas designated as Natura 2000 sites cannot be excluded, a Natura Impact Report must be prepared and an Appropriate Assessment must be carried out.

8. Other / procedural issues

The Office welcomes the planning authority's decision to publish an Issues Paper and invite submissions in respect of the preparation of a LAP for Roscommon Town, in view of the discretion allowed by the planning authority in this regard under section 20(1) of the Act.

Summary

In summary, the Office commends your authority for the preparation of this Issues Paper.

The Office advises your authority to pay particular attention to the following issues in the preparation of the local area plan:

- Ensure that any lands zoned for New Residential are appropriate in terms of delivery of the housing supply target for Roscommon Town in the County

Development Plan, are serviced or serviceable within the plan period, and are consistent with compact growth and the sequential approach to development;

- Review the extent of lands zoned for Strategic Residential Reserve in the current LAP in terms of their suitability to deliver compact growth and sequential development over the longer term;
- Review and refine the extent of the LAP boundary to ensure it is appropriate in terms of promoting compact growth and sequential development;
- Carry out a settlement capacity audit / infrastructural capacity assessment to inform land use zonings in the Draft LAP;
- Identify opportunity sites including those referred to in the RSES which can support town centre regeneration and economic development and also include proactive land activation measures regarding same;
- The development of the LAP should ensure consistency with the principles set out in the Government's Town Centre First Policy;
- The LAP should be informed by a Local Transport Plan prepared in consultation with the NTA and TII as appropriate;
- Provide for monitoring and implementation of the various policies, objectives and actions in the final LAP.

The Office looks forward to reviewing the draft local area plan and is committed to continued positive engagement with your authority in implementation of national and regional policies at county and local level.

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 the undersigned or at plans@opr.ie.

Is mise le meas,



Anne Marie O'Connor

Deputy Regulator and Director of Plans Evaluations
