



Oifig an
Rialaitheora Pleanála
Office of the
Planning Regulator

19th October 2026

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

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

A chara,

Thank you for your authority's work in preparing the Material Alterations (material alterations) to 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 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, submissions may include 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. Response to the Office's submission on the proposed Variation

The Office welcomes and commends the significant work undertaken by the Planning Authority to date including the proposed material alterations that address the recommendations and observations set out in the Office's submission at draft stage.

In particular, regarding the integration of land use planning and transportation, the Office welcomes MA 1 in response to Recommendation 2. This amendment introduces a policy objective committing to the preparation of a Joint Strategy for the development of Athlone supported by a Local Transport Plan (LTP) to inform the strategy prepared collaboratively between the Planning Authority, Westmeath County Council and other key stakeholders.

Additionally, in response to Recommendation 2, the Office welcomes MA 16 relating to Roscommon Town committing to the preparation of an LTP for the settlement incorporating associated policy objectives. Furthermore, in relation to LTPs, while MA 24 relating to Boyle is welcomed in principle, the LTP has not been integrated into the Boyle Settlement Plan. Accordingly, this matter is addressed further below in this submission.

In relation to flood risk management, the Office has identified a number of deficiencies in the Planning Authority's response to Recommendation 1 of the Office's submission at draft stage. Specifically, the Planning Authority has not addressed Recommendation 1 in respect of the following:

- the omission of lands at Cortober (Amendment No. 58 at the draft stage) where it was proposed to rezone the site from Open Space and Amenity to Community Infrastructure (which facilitates high vulnerable and vulnerable development) on parts of the land which are located in Flood Zone A and B without passing a Plan Making Justification Test (Justification Test) in accordance with The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) (Flood Guidelines);
- the Strategic Flood Risk Assessment (SFRA) has not been amended to reference the Flood Relief Schemes for Roscommon Town and to include a

specific objective for Roscommon Town and Boyle in respect of the Flood Relief Schemes as per the conclusions of the SFRA; and

- the Justification Tests for Boyle town centre in the SFRA have not been amended to include reference to the Flood Relief Scheme or to identify any residual risk or apply a precautionary approach to undeveloped lands adjoining the Town Core by providing water compatible zonings where necessary.

Moreover, as outlined below, the Planning Authority has not included an updated SFRA to assess the proposed rezonings arising from the material alterations within the settlements of Castlerea, Strokestown, Roscommon Town, Cortober and Boyle.

These matters represent a serious failure to implement National Policy Objective (NPO) 78 of the National Planning Framework First Revision (2025) (NPF) and Regional Policy Objective 3.10 of the Regional Spatial and Economic Strategy for the Northern and Western Region in accordance with the Flood Guidelines.

Given the nature and extent of the issues raised in relation to the flood risk management and implementation of the Flood Guidelines, the Planning Authority is strongly advised to engage proactively with the Office of Public Works to resolve these matters prior to the adoption of the Variation.

Should these matters remain unresolved prior to the adoption of the Variation, and the elected members do not to comply with the Office's recommendations, the elected members must issue a notice further to section 58(12)(e) of the Act informing the Office of that decision and provide a statement of reasons for their decision not to comply.

2. Overview of submission on proposed material alterations

As set out above, the Office welcomes the proposed material alterations which positively respond to the recommendations made in its draft stage submission. Overall, the Office estimates that the Planning Authority proposes to zone approximately additional 23 ha of land for New Residential with the potential for a further 800 homes for the county.

While the Office is satisfied that most proposed Residential zoning amendments are appropriately located and will contribute to housing delivery over the short to medium term, three proposed Residential zonings at Strokestown, Castlerea and Cortober are located on peripheral lands outside the settlement boundaries. As such, they do not support the compact and sequential growth of these settlements and are contrary to the objective of directing housing development to sustainable, serviced locations.

In relation to MA 19 in Roscommon Town, which proposes the zoning of lands from unzoned to New Residential, the Office notes that the lands were previously subject to a Ministerial Direction under section 31 of the Planning and Development Act 2000, as amended, on the basis that the proposed zoning was inconsistent with NPO 3 of the NPF, as the majority of the lands lay outside the 2016 CSO settlement boundary. However, subsequent revisions to the CSO settlement boundary mean that the lands are now located entirely within the 2022 settlement boundary. In light of this change, the Office has not made a recommendation in respect of MA 19. However, a modification is required to ensure that any future residential development accesses the site via the local road network and that direct access onto the N63C, where the speed limit exceeds 60 km/h, is prohibited.

The Office has further concerns in relation to flood risk management and has made recommendations relating to the SFRA, and proposed residential zoning and changes to the zoning matrix that facilitate highly vulnerable development in areas at risk of flooding.

Finally, the Office has raised concerns in relation to the safety and capacity of the national roads network and the protection of the proposed N4 Carrick-on-Shannon Bypass and Traffic Management Project. The integration of the key measures from the LTPs is also recommended.

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

Subject	Recommendation	Observation
Residential zoned land	MA Recommendation 1	MA Observation 1
Flood risk management	MA Recommendation 2	-
Integration of land use planning and transportation	MA Recommendation 3	-
National road network	MA Recommendation 4	-

3. Residential zoned land

The Office welcomes the Planning Authority's proposal to zone estimated 23 ha additional residential lands across eight New Residential and Residential Opportunity Sites. However, the final hectares and housing yield should be clarified in the core strategy table as per Observation 1 below.

While the Office is satisfied that the majority of the material alterations to zone additional residential lands in five different settlements in the county are appropriately located in relation to town centre locations, existing services and amenities, the Office has concerns that a number of proposed Residential zonings are inconsistent with the objectives of NPO 9 of the NPF for compact and sequential patterns of growth and NPO 43 of the NPF to prioritise the provision of new homes at locations that can support sustainable development.

In particular, the Office has concerns regarding MA 14 at Farnbeg, Strokestown, MA 6 at Arm, Castlerea and MA 23 at Tullyleague, Cortober. These lands are located in peripheral and non-sequential locations in the open countryside outside the settlement boundaries and the CSO 2022 Built Up Areas of Strokestown, Castlerea and Cortober. Given their separation distance from the existing built-up footprint, services and amenities, the proposed zonings do not support compact and sequential patterns of growth, and have the potential to result in a car-dependent pattern of development contrary to the provision of new homes at locations that can support sustainable development.

In addition, it appears that these locations are currently unserved, and the supporting documentation does not demonstrate that the necessary infrastructure can be provided within the lifetime of the Development Plan. This is inconsistent with the requirements of NPOs 101 and 103 of the NPF and the NPF Implementation: Housing Growth Requirements (2025) (Housing Growth Guidelines), which require residentially zoned lands to be supported by a clear evidence base demonstrating their serviceability and deliverability within the plan period.

Accordingly, the Office recommends the omission of proposed New Residential rezonings introduced by MA 14 at Farnbeg, Strokestown, MA 6 at Arm, Castlereagh and MA 23 at Tullyleague, Cortober from the adopted Variation.

MA Recommendation 1 - Residential Zoned Land

Having regard to the provision of a sufficient supply of residential zoned land to support compact and sustainable growth, the co-ordination of land use zoning, infrastructure and services, and having considered:

- NPO 9 of the NPF to ensure compact and sequential patterns of growth;
- NPO 43 of the NPF to prioritise the provision of new homes at locations that can support sustainable development;
- NPOs 101 and 103 of the NPF for the tiered approach to zoning and the coordination of land use zoning, infrastructure and services;
- the Development Plans, Guidelines for Planning Authorities (2022), including the policy and objective for a sequential approach to zoning and the policy and objective for zoned land to be informed by the Settlement Capacity Audit; and
- NPF Implementation: Housing Growth Requirements (2025) to demonstrate that residential lands are serviceable and can be delivered within the lifetime of the plan;

the Office recommends that the Planning Authority makes the Variation without:

- (i) MA 14 at Strokestown to rezone lands at Farnbeg from unzoned to New Residential;
- (ii) MA 6 at Castlerea to rezone lands at Arm from unzoned to New Residential; and
- (iii) MA 23 at Cortober to rezone lands at Tullyleague from unzoned to New Residential.

The Office also notes it has not been demonstrated that the proposed material alterations have been adequately assessed through the Settlement Capacity Audit (SCA). Notwithstanding the reference to the specific proposed zonings to be omitted as listed above, the Planning Authority is advised, in the interest of transparency and completeness, to review and update the SCA prior to adopting the Variation to ensure it accurately reflects the changes arising from both the draft and material alterations stages of the proposed Variation.

Similarly, a revised core strategy table has also not been provided to reflect the proposed new zonings. In the interest of transparency, and to take due account of the Housing Growth Guidelines, the Office advises the Planning Authority to update the core strategy at the adoption stage to reflect the quantum of New Residential lands for each settlement and overall total for the county.

The Office also notes that MA 15 partially addresses Observation 1 of the Office's submission at the draft stage regarding the implementation of the Housing Growth Guidelines through updates to the SCA tables to provide site areas (ha) and revised information relating to water supply and wastewater infrastructure. However, residential density assumptions have not been included and the potential residential yield (units) for newly zoned residential lands has not been quantified. Additionally, the SCA has not been updated to reflect the proposed material alterations. This matter should be addressed as part of the Planning Authority's response to MA Observation 1 below.

MA 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 core strategy of the Roscommon County Development Plan 2022-2028 to accurately reflect the rezoning of residential lands for each settlement and overall quantum for the county, arising from the material alterations;
- (ii) review and update the Settlement Capacity Audit (SCA) presented as part of the proposed Variation at draft stage to take account of the changes arising from the material alterations; and
- (iii) update the SCA to include reference to proposed densities and the yields associated with all of the residential zoned lands arising from the Variation.

4. Flood risk management

Section 2.3 of the Screening for SEA Report states that the proposed material alterations have been considered by SFRA and concludes that:

Taking into account the existing Development Plan measures and the measures contained in the Proposed Variation, all Proposed Material

Alterations are found to be in compliance with the Ministerial Guidelines on Flood Risk Management.

Notwithstanding this conclusion, the Office notes that an updated or addendum SFRA is not included as part of the material alterations documentation. It has not therefore been demonstrated that the sequential approach has been followed and that, where relevant, Plan Making Justification Tests have been carried out and passed in accordance with the Flood Guidelines.

The Office has particular concerns in relation to the proposed residential zoning of MA 18(a) Roscommon Town. A large proportion of this site has experienced both fluvial and pluvial flooding in winter 2015/2016, and ground water flooding for multiple years. This has not been addressed in an updated SFRA and assessed through the Sequential Approach or considered with an appropriate Justification Test. As such, the proposed Variation should be made without New Residential zoning MA 18(a).

The Office notes that material alterations are proposed which amend the zoning matrix for Ballaghaderreen, Castlerea, Elphin and Strokestown (MA 2, MA 3, MA 8 and MA 9). In relation to Agriculture zonings, the Planning Authority is proposing to allow for Infrastructure and Utilities to be Open for Consideration in each of these settlements. As Infrastructure and Utilities are considered a highly vulnerable type of development, the Office recommends this is removed as a potential use from the Agriculture zoning objective or to include a policy that restricts such uses in Flood Zone A or B.

MA Recommendation 2 - 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 updates the Strategic Flood Risk Assessment to take account of the proposed new zoning objectives and amend or omit any material alterations to ensure that no highly vulnerable development is facilitated within Flood Zone A or B, and no vulnerable development is facilitated within Flood Zone A;
- (ii) makes the Variation without MA 18(a) Roscommon Town; and
- (iii) makes the Variation without MA 2, MA 3, MA 8 and MA 9 from zoning matrixes for Ballaghaderreen, Castlerea, Elphin and Strokestown to ensure that highly vulnerable Infrastructure and Utilities development is not Open for Consideration on Agriculture zonings, or alternatively to include a policy to restrict such uses in Flood Zone A or B.

The Planning Authority is advised to consult with the Office of Public Works in addressing this recommendation.

5. Integration of land use planning and transportation

The Office welcomes the additional policy objectives set out in MA 24 in regard to the Boyle Settlement Plan including commitments to progress the measures identified in the Boyle LTP, facilitating improved accessibility and deliver smart mobility and active travel initiatives supported by three new Sustainable Transport Policy Objectives.

The integration of transport and land use planning is a key principle of national and regional planning policy, underpinning the delivery of sustainable communities and the achievement of climate objectives. This is particularly important in the context of the proposed Residential zoning at Foxwood Manor (MA 27) to ensure this site is well integrated into the services and amenities of the town. The Office considers therefore that the key priority measures, implementation timeframes and monitoring arrangements set out in the final LTP should be incorporated into the Boyle Settlement Plan.

MA Recommendation 3 - 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 37 of the NPF to ensure the integration of safe and convenient alternative to car usage;
- 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 integrate priority measures, with associated timelines, implementation and monitoring arrangements from the finalised Boyle Local Transport Plan into the Boyle Settlement Plan.

6. National road network

The Office notes that the proposed residential zoning, MA 19 Roscommon Town adjoins the N63 national road, where a 100 km/h speed limit applies. Section 2.5 of the Spatial Planning and National Roads Guidelines for Planning Authorities (2012) (National Roads Guidelines) advise that the planning authority should avoid the creation of any additional access point from new development of increased traffic from existing accesses to national roads to which speed limits are greater than 60

km/h apply unless exception circumstances have been agreed in accordance with section 2.6 of the National Roads Guidelines. Therefore, to protect the strategic function, carrying capacity and safety of the national road network, direct access to the N63 from the MA 19 lands should be avoided, and access should be provided via the local road network along the northern boundary. The inclusion of a policy objective to this effect is therefore recommended.

In addition, the Office notes that the mapping at MA 22, Cortober proposing the inclusion of the route for the N4 Carrick-on-Shannon Bypass and Traffic Management Project, is not accurate and up to date. As a result of this uncertainty there are implications arising for proposed New Residential zoning, MA 23 Tullyleague, Cortober, which may conflict with the delivery of the bypass and traffic management project. Section 2.9 of the National Roads Guidelines states that development plans should protect the alignments and land requirements of future national road projects, ensuring that zoning and development objectives do not prejudice route selection, increase scheme costs, or compromise the delivery of strategically important road infrastructure. The Office therefore recommends that the MA 22 mapping is reviewed. Given the lack of clarity regarding the final route alignment, proposed residential zoning at MA 23 is considered to be premature and should be omitted at this point in time to avoid any potential conflict with the N4 Carrick-on-Shannon Bypass and Traffic Management Project.

MA Recommendation 4 - National Road Network

Having regard to the need to maintain the strategic carrying capacity and safety of the national road network and having considered:

- NPO 107 of the NPF to support the delivery of National Strategic Outcomes;
- NSO 2 of the NPF Enhanced Regional Accessibility;
- RPO 6.5 of the RSES to maintain and enhance the strategic function of the national road network;
- Policy Objectives ITC 7.14 and ITC 7.15 of Roscommon County Development Plan 2022-2028; and

- section 2.5 and 2.9 the Spatial Planning and National Roads Guidelines for Planning Authorities (2012) (National Roads Guidelines),

the Office recommends that the Planning Authority:

- (i) makes a minor amendment to proposed residential zoning at MA 19 Roscommon Town, to include a policy objective ensuring that direct access onto the N63 shall not be permitted and that access to the lands is provided by the local road network adjoining the northern boundary via The Walk;
- (ii) reviews MA 22 Cortober to ensure that the proposed N4 Carrick-on-Shannon Bypass and Traffic Management Project mapping is accurate and up to date; and
- (iii) subsequent to the outcome of (ii) above, makes the Variation without zoning MA 23 Tullyleague, Cortober to protect the alignment and land requirement of the N4 Carrick-on-Shannon Bypass and Traffic Management Project.

The Planning Authority should consult with Transport Infrastructure Ireland in addressing this recommendation.

7. Next steps

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

As part of this process, the Chief Executive's report to the elected members, prepared under section 58(15) 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 the elected members decide not to comply with a recommendation, including a statement of reasons for the decision of elected members; and
- 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.

Is mise le meas,



Anne Marie O'Connor

Deputy Regulator and Director of Planning Policy Implementation

Designated Public Official under the Regulation of Lobbying Act 2015
