



Roscommon Town Draft Local Area Plan
Forward Planning Section
Roscommon County Council
Aras An Chontae
Roscommon

via portal: rosdevplan.ie

30/01/2024

RE: ROSCOMMON TOWN DRAFT LOCAL AREA PLAN 2024 – 2030

A Chara,

I refer to your notification on 15 December 2023 that the Draft Roscommon Town Local Area Plan had been published. The Northern and Western Regional Assembly ('the Assembly') wish to thank you for the opportunity to make this submission and set out below its report together with recommendations and observations in respect of the Draft Plan.

This submission will comment upon the Draft Local Area Plan in the context of its consistency with relevant objectives in the RSES and with the ambitions and goals identified in Section 3.8 of the Strategy, as it relates to Roscommon and the identified Key Future Priorities.

Issues and Considerations

Roscommon is identified as a Key Town within the RSES (Regional Spatial and Economic Strategy), whereby its important role as a Sub Regional driver for the wider County of Roscommon is acknowledged, and the Regional Policy ambition sets out a goal to grow the town by 30% between 2016 and 2040. The NWRA note that a substantial rise in population has occurred since 2016 - an increase of 11.55% on 2016 figures - bringing the population of the town to 6,555 persons in the 2022 Census. Population growth has occurred in all small areas (where boundaries have not changed in the 2022 Census) within the draft LAP boundary with one exception (see maps below). It is noted that the population growth ambition of 30% from 2016 to 2040 has been provided for in the draft LAP plan period (to 2030). This is generally consistent with the aims of Sec. 3.4 of the RSES and demonstrates a clear planning policy alignment.

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RPO 3.1 of the RSES refers to significant compact growth ambition in Key Towns. This is reflected in the draft LAP, Section 4.3 of the draft LAP deals with Compact Growth and does appear to reflect the ambition of RPO 3.2 of the RSES, which sets a target of 30% within designated Key Towns. However, the proposed plan boundary has excluded significant areas of the Census 2022 ‘Built Up Area’ of Roscommon, which is defined by the CSO as the footprint of urban centres and is based upon an agreed methodology between the CSO, the Department of Housing, Local Government and Heritage (DHLGH), and Tailte Éireann (formerly OSi). The outcome is that buildings, including housing developments and a substantial unfinished housing development opposite Aran Court, Galway Road, is being excluded from the plan area although they form part of the existing built up footprint of the settlement. Thus, part of the built up footprint of the town will not be appropriately managed by the local area plan policy framework. This will cause conflict with NPO 3c of the National Planning Framework and RPO 3.2c of the RSES and this should be remedied, whilst ensuring the policy of compact growth is not diluted.

It has been calculated by the planning authority that 17.15ha of land is required for housing. Almost 20 hectares of land is zoned “New Residential” and “Opportunity Residential Sites” (15.22ha and 4.7ha respectively) within the draft Plan area to facilitate this requirement. Table 4.1 of the draft plan sets out the population growth and residential land requirements. Table 4.1 (below) and the projections therein appear to significantly frontload the forecast population growth from 2022 – 2028, and thereafter significantly reduces between the period 2028 – 2031.

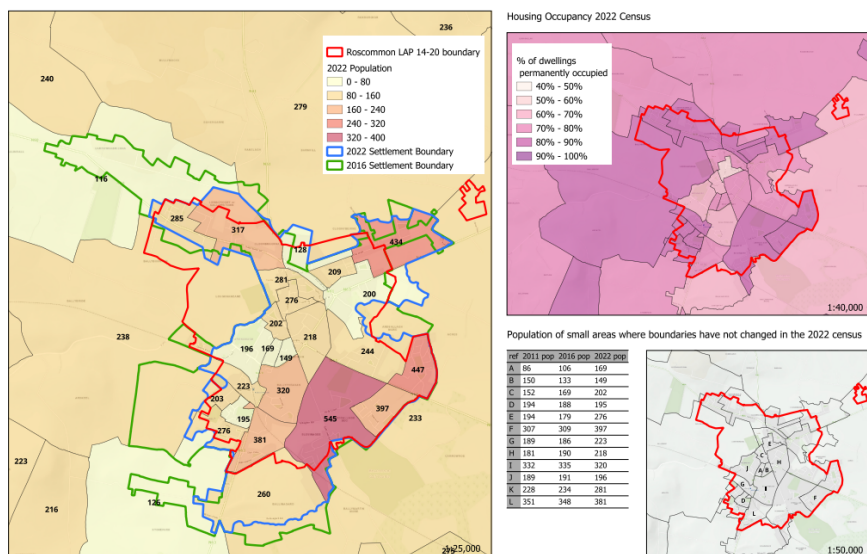
Table 4.1: Population Growth Forecast and Residential Land Requirements

Settlement	2016 Population	Projected Population Growth 2022-2028	Projected Population Growth 2028-2031	New Residential Units	Proposed Density	Residential Zoned Land Requirement	Units to be delivered on infill/ brownfield lands
Roscommon Town	5,900	1,608	170	600	35 units/ha	17.15ha	180

Housing completion data (CSO) indicates a major increase in new dwelling completions in Roscommon Town in 2021 at 70 units, compared to an average of 18 units/annum between 2016 and 2020. However, there was a major drop in 2022 with only 7 units completed. The RSES 2-year implementation Report (Section 6) reflects Roscommon Town as having a low level of residential completions on an Annual Basis (2016 – 2022), which is in line with most other Regional Key Towns, and an increase in Housing Supply output annually will be required during the lifetime of this Plan.

Having reviewed the 2022 Census data, the NWRA note that the housing vacancy rate is quite high in the core of the town in particular east of Castle Street (map below). However, it is noted that the development strategy for the town focuses on compact growth and regeneration.

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Commercial vacancy rates in some of the region’s most prominent towns including Roscommon were high, with all settlements registering vacancy rates above 20%, with Roscommon at 21% in 2019. Latest available figures (Q2 2023 Source: Geodirectory) indicate that this has dropped to 17.6%. Whilst the reduction is to be welcomed, the average remains high and in need of additional intervention.

There appear to be no calculations provided to determine whether sufficient land has been zoned for industry and enterprise. It is also noted that some of the land zoned as Strategic Industry / Enterprise Zones has been developed and this is not reflected on the zoning maps provided, which may lead to misinterpretation of available undeveloped lands for such purposes. Provision should be made for suitably located and zoned land to accommodate a large industry/enterprise locating to the town, the 17 Hectare site to the South of the N-60 may well be sufficient in this regard. It is further noted this area generally has been identified with the RSES (Key Future Priorities for Roscommon Town, Sec. 3.8) as being capable of facilitating new enterprises / employment uses. This land could be zoned with a sequential objective.

The intent of the proposed zoning “unzoned” - also referred to as “white lands” - introduces lack of a clear policy approach. There is an opportunity to zone such lands for a particular use and consideration should be given to zoning these lands ‘Agricultural, Community Infrastructure and Green Infrastructure’. These land uses would be consistent with the mandatory requirement for development plans to include objectives for ‘the preservation, improvement and extension of amenities and recreational amenities’ and is supported by Chapter 9.4 of the ‘Development Plans, Guidelines for Planning Authorities’ (June 2022), which confirm that.. “The definition of ‘amenities’ is potentially quite broad, ranging from natural amenity assets such as parks, open spaces, green infrastructure, greenways etc and also social and community facilities.” Furthermore, RPO 3.5 of the RSES refers to identifying and developing quality green infrastructure within or adjacent to Key Towns. There does not

appear to be any key projects identified in the draft LAP and this should be further considered – and the reference above to ‘white land’ could form part of same.

Roscommon Town Main Drainage is identified in the RSES as one of the projects necessary to deliver the growth model outlined in the RSES. It is noted in the draft LAP that this project has commenced, and its completion should provide the necessary headroom to realise the growth ambition for the Town outlined in the Regional Strategy.

Roscommon is identified as a Key Destination Town and RPO 4.9 of the RSES requires provision for the expansion in accommodation, and facilities within key destination towns, including Roscommon Town, together with necessary supporting infrastructural investments, including improvements in the public realm, transport links, accommodation, the night-time economy, and sustainable development of our natural and built economy. RPO 4.11 of the RSES supports the upgrade of Public Transport infrastructural facilities in Destination Towns, including the provision of Transport Hubs/Links, and additional accommodation. The draft LAP does not appear to contain any policies which reflect such measures, which form part of Failte Irelands strategic approach to growing the Tourism offer across the Regions. RPO 5.11 of the RSES supports the provision or upgrade of cultural amenities with priority given to Key Towns. The Plan could be enhanced through reference to such projects if they are embryonic and/or reflect on the existing Cultural amenities in Roscommon where enhancement could bring improvements to the public realm, or through another guise.

RPO 6.26 and RPO 6.27 of the RSES refers to supporting and guidance on the preparation of Local Transport Plans including one for Roscommon Town. A Local Transport Plan (LTP) does not form part of the Plan. While it is noted that a Roscommon Town Approaches and Movement Study (RTAMS) has been carried out and taken into account in the preparation of the draft LAP, a LTP is considered more appropriate for the Key town of Roscommon as the principals of the NIFTI¹ would be followed to achieve a modal shift that can then be then delivered through specific objectives in the LAP.

Recommendations

1. Amend the plan boundary to include all lands within the CSO “Built Up Area” of Roscommon Town, defined as the footprint of urban centres by the CSO in methodology that has been agreed between the CSO, the DHLGH and Tailte Éireann. This will enable existing clusters / neighbourhoods that form part of the footprint of the urban fabric of the town to be appropriately managed through the provisions of the draft LAP.
2. The Plan be reviewed to ensure there is sufficient land available for industrial/enterprises uses, with particular scrutiny on the extent of lands Zoned to the North and South of the N-60, which is identified as an area suitable for

¹ [NIFTI – National Investment Framework for Transport in Ireland \(Dept Transport 2021\)](#)

the accommodation of new enterprises / employment related uses within Sec. 5.7 of the RSES (*Key Future Priorities for Roscommon Town*).

3. The Local Area Plan be accompanied by a Local Transport Plan which corresponds with the Land-Use policies contained for Roscommon, and which reflects the wider policy requirements of the RSES via RPO 6.27.
4. The Local Area Plan be revised to include the identification of specific projects/developments in Culture / the Arts / and Tourism for Roscommon (a Key Town and a Key Destination Town within Failte Ireland's Regional Strategy) to be delivered over the lifetime of the LAP. Such projects could incorporate green infrastructure measures (which may emerge from the LTP) via a schematic map or a visual representation of such projects could be considered, to illustrate such projects/developments.
5. Make provision for quality green infrastructure as provided within RPO 3.5 of the RSES.

Observations

1. Some areas within lands to be Zoned Strategic Industry/Enterprise have been developed / built upon, which has not been reflected in the land use zoning maps and may merit review.
2. Consideration should be given to zoning 'Un-zoned' or 'White Lands' for particular purposes, such as Agricultural, Community Infrastructure or Green Infrastructure. This may also help address Recommendation 4.
3. Roscommon Town is designated a 'Destination Town' and within the context of RPOs 4.9 and 4.11 there would be merit in reviewing if there is a need to upgrade Public Transport infrastructural facilities in the town, including the provision of Transport Hubs/Links, public realm and additional accommodation.

Summary

Generally, the Draft Roscommon LAP demonstrates a high degree of consistency with the RSES in its central aims. However, the elements highlighted above if addressed have the potential to further reinforce policy alignment and appropriately address the proper planning and sustainable development of Roscommon Town.

It is noted the advancement of the Local Area Plan for Roscommon will occur during a period of significant Policy adjustment, with the impending National Planning Framework (NPF) revision to be followed by a review and update of the Regional Spatial & Economic Strategies. The Assembly looks forward to ongoing collaboration with Roscommon County Council in this regard.

Finally, I wish to thank Roscommon County Council for the opportunity given to provide this submission and I hope that it is of assistance in considering the draft LAP. If you have any queries in respect of the above, then do not hesitate to revert.

Mise le meas



Denis Kelly
Director