



County Development Plan Review,
Forward Planning,
Planning Department,
Roscommon County Council,
Áras an Chontae,
Roscommon,
F45 VR98.

30th June, 2021

RE: Draft Roscommon County Development Plan 2021-2027

A Chara,

I refer to the notification received from Roscommon County Council on 21st April, 2021 advising that it had prepared the Draft Roscommon County Development Plan 2021 - 2027 and inviting submissions on issues that need to be addressed. The Northern and Western Regional Assembly wish to thank you for notifying it of this.

The Regional Assembly is required under S27B of the Planning and Development Act to prepare submissions and observations, which shall include a report setting out its opinion on whether the draft development plan, and, in particular, its core strategy is consistent with the RSES. The Regional Assembly can make recommendations to Roscommon County Council on amendments necessary to ensure consistency. In this context the Regional Assembly sets out below its report, together with recommendations and observations.

Format of Submission

It is informative to give a description of the draft to appreciate the scope and scale of the effort involved in making it. The draft comprises two volumes, the first is the written statement and the second is a series of area plans. It is accompanied by five complementary documents, Housing Strategy, Renewable Energy Strategy, Retail Strategy, Landscape Character Assessment and a Record of Protected Structures. There are in addition three environmental reports, Strategic Environmental Assessment, Appropriate Assessment and Flood Risk Assessment. The documents above each contain appendices and references/ links to other documents. In all, the suite of documents run to c.1300 pages. This, we are aware from consideration of other plans, is not unusual and has its advantages and disadvantages. The main advantage is the comprehensiveness of the documents and the main disadvantage is the difficulty any individual has in reading, considering and analysing the contents of the various documents. Volumes 1 and 2 which contain the main elements of the plan are easy to read and have visually interesting graphics.

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The format of the written statement is typical of current County Development Plans. Indeed, it has close similarities with the RSES format and graphic design. The introduction is followed by the core strategy. The next three chapters deal with urban and rural areas in terms of place making and residential development. The following chapters include economic development, infrastructure, climate actions, heritage, community development and finally development management standards.

The examination of the draft will concentrate on each individual chapter and offer commentary on the similarities and differences (if any) between the policy objectives and the RPOs in the RSES.

There is a consistent approach in the draft in the introduction to each chapter and how it links the draft with national and regional policies and it goes on to develop these to county level.

Chapter 1 introduces the development plan process and the position of the DRCDP in the hierarchy of the plans and how the NPF and RSES evolved from the UN sustainable development goals, the national strategic outcomes and our own growth ambitions. This chapter identifies climate change as a critical issue and a cross cutting theme through the draft plan.

The chapter goes on to provide a roadmap of the plan itself, the other volumes, the complementary documents and the various environmental assessments and reports.

The chapter is completed with a strategic vision for the county to develop it sustainably, economically, socially and culturally. It sets out its strategic aims to this end. The chapter ends with descriptions of the monitoring and implementation, refers to the council work the CDP (S15 of the act) and the RSES (S22A of the act).

The opening chapter does not contain any development objectives but is consistent with much of the content in the RSES and is similar in structure to many other county development plans under preparation.

Chapter 2 is the core strategy and settlement policy for the county and we are aware this is one of the most interrogated and important parts of the plan. The core strategy is significantly different to previous versions in that there is an emphasis on compact development and a re-ordering in the importance of settlements in the county. The strategy also drills down to the smallest levels of settlements in the county and provides numerical targets for all tiers of settlements. The population growth is biased towards the regional growth centres and the key towns in and around the county boundary, further elaboration on this is given below. The overall population growth for the county accords with the range set for Roscommon in the NPF roadmap and to this end is consistent with the RSES, refer CS21 DRCDP and S3.4 and RPO 3.1 of the RSES. There are however areas of concern with consistency with population targets in the first instance for the regional growth centre and the key town of Roscommon and secondly for the principles of balanced and effective regional development explored in the NPF and the RSES in terms of the quantum of development proposed in rural areas.

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In the case of the former, the RSES proposes a population increase for the parts of Athlone within the county of 1500 by 2031 and 1800 by 2040 refer S3.7(a) RSES, the DRCDP proposes a population increase in Athlone of 1763 by 2027. In the case of Roscommon Town, the population increase of 30% by 2040 is the target in the RSES, the DRCDP is proposing to front load 85% of this target by 2027 (i.e. 1500 population increase). These proposals are inconsistent with the RSES. The consequences of these proposals will affect the whole county. The current population distribution in the county between urban/ rural is 27/73 and there are more than 38,000 people living in the open countryside. The population growth being planned for is heavily biased in favour of the urban areas including the self-sustaining towns, serviced and un-serviced villages. The remainder of the population allocated in the rural area will provide growth just under 2.5%, which is equivalent to approximately 60 houses/ year over the lifetime of the plan. The core strategy table proposes a 3% increase in serviced villages and a 12% increase in un-serviced villages. It is difficult to see how these proposals will translate to maintaining vibrant communities and services in rural areas. The figures will mean that on average, mortality rates will outstrip new arrivals into the rural communities meaning that planned depopulation is a feature of the DRCDP for the majority of the population in the county. The Regional Assembly would have concerns that the balance in terms of planned population distribution has tipped too far in favour of urban areas and will result in imbalanced and unhealthy communities.

The Regional Assembly would have concerns that the core strategy would be contrary to National Strategic Outcome 3 - strengthen rural communities and be inconsistent with RPO 7.17 to ensure that housing delivered meets the needs of the communities in urban and rural areas.

Having dealt with the issues of population growth the draft goes on to propose policy objectives that encourage regeneration and brownfield development CS 2.2-2.5. These are consistent with RPOS 3.2-3.4, however, the RSES has a target of 40% of new housing in regional growth centres within the existing built-up footprint (rather than 30% in DRCDP) and also a target of 20% of new housing in rural areas on brownfield sites. The Regional Assembly ask that the council reconsider these matters to attain better consistency.

The draft provides a settlement hierarchy on map 2.2 and follows on with a settlement strategy that stretches from regional growth centre at the top to rural areas at the bottom, the strategy is consistent with the type of hierarchy expected and in that regard is consistent with the RSES. There are however as referred to previously some notable changes to the strategy in the current CDP in which our members have an interest. There are 3 main differences, the re-categorisation of settlements presently at tier 2, the re-categorisation of settlements presently in tier 3 and the disappearance of an important tier 4 village. The existing tier 2 settlements are Boyle, Ballaghaderreen and Castlerea. Boyle will become a tier 3 settlement on its own and is designated a self-sustaining growth town. Castlerea and Ballaghaderreen are tier 4 settlements joined by Strokestown and Elphin and are designated as self-sustaining towns. Hodson Bay/ Barrymore from being a tier 3 tertiary growth centre is now categorised as a tier 5 serviced settlement. Creagh which is the area in Roscommon bordering Ballinasloe (key town) and is at present a tier 4 serviced village fails to feature in the proposed settlement hierarchy to the DRCDP.

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The Regional Assembly have the following comments in relation to the above. The urban footprints of Roscommon are small and it is therefore important to recognise the potential of all urban areas in the county and in this regard the areas of Creagh and Hodson Bay are of particular importance because of their proximity to and links with large settlements in adjoining counties RCC has already recognised this potential with Cortober linked with Carrick-on-Shannon. The Regional Assembly would urge that similar considerations be given to Creagh linked with Ballinasloe and Hodson Bay linked with Athlone.

The settlement strategy in considering Athlone proposes a joint urban area plan which is defined in appendix 6 as a joint local area plan made by RCC and WMCC. This is consistent with some of RPO 3.7.1. The Regional Assembly ask that specific population targets for Athlone (west) are referenced in the draft together with RPOs 3.7.2- 3.7.19 which provide policy direction for Athlone (west) together with the criteria to be used to define the urban area set out in S3.7.1a of the RSES. The Regional Assembly note the proposal to make an LAP for the key town of Roscommon (similar to other counties who are adopting similar approaches) and would advise that delays in planning for the settlements at the top of the hierarchy will possibly place them at a disadvantage as there is no spatial data on zoned lands in these settlements.

Chapter 3 of the DRCDP deals with housing. This chapter is informed in addition to the planning hierarchy by the housing strategy which is an accompanying document to the draft and a HNDA. The policies for housing delivery PPH 3.1-3.11, PPH 3.18-20 broadly aligned with regional policies RPO 3.1, 3.6-3.8 and are consistent. The Regional Assembly recommend that the policy for the provision of serviced sites be extended to small towns and that elaboration on timeframes for identification of specific areas take into account the timeframes in the RSES. The urgency associated with delivery of these types of programs has increased recently.

Chapter 3 goes on to deal with rural housing and as part of that process it identifies two areas, those under urban influence and remaining rural areas. These designations are based on commuting patterns. The sustainable rural housing guidelines identify 4 rural area types and further advise that most rural counties will contain 3 area types. Roscommon would be one of these counties. The area types are designated on the basis of population and housing trends rather than commuting. There appears to be an interchangeability between commuting and persons employed, the census figures on which commuting patterns were generated included travel for education as well as employment purposes and clarification from the council on this aspect of the figures would better inform the public on the strategy being formulated. The analysis used in arriving at two rural area types is very simple and a more nuanced approach may be warranted to bring a more sophisticated solution. The economic need for rural housing is quite limited in its scope. What about employment in the areas of education, construction, vehicle maintenance, commercial services, community services, remote working, carers, how will these be accommodated for the over 38,000 people who live in rural Roscommon?

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Chapter 4 looks at towns and villages in the county. The policies for their development includes consolidation, high quality attractive places and good urban design with an emphasis on regeneration and use of vacant premises. These policies are consistent with RPOS 3.6-3.9 and RPO 7.19-7.20.

The chapter refers to the area plans proposed for self-sustaining towns, vacancy, urban regeneration and town centre living and provides policy objectives TV4.15-TV4.19 in relation to these. These are very much consistent with the RSES policies for brownfield development, vacancy monitoring and re-use of town centres refer RPO 7.20.

Chapter 5 deals with rural development and natural resources. The chapter cites the CEDRA report as providing roadmap for rural development. This report was published in 2014 and whilst it still has relevance it may need to be updated to address issues of 2021-2027 and reference should possibly be made to the action plan for rural development published in 2018.

The next section of the chapter deals with agriculture and the policies RD5.2-5 are consistent with those in RSES, the council may however consider the importance and potential of agriculture having regard to RPOS 4.23-4.26. relating to agri-food.

Forestry is the next topic examined and the subsequent policies supports new forestry in situations where it does not cause adverse environmental impacts and encourages collaboration between developers and provision of tourist infrastructure. The RSES whilst generally supporting forestry in S5.9 of the strategy recognises that its development is outside the scope of the planning acts and it consequently does not have any specific policy objectives. It does however have an objective RPO 5.24 to set up a regional forum to establish a framework for sustainable afforestation, considering the level of forestry land cover 11% in Roscommon, the council could consider being a stakeholder in such a forum.

Chapter 6 examines economic development in towns and villages. It makes references to 'invest Roscommon' a specialisation strategy which identifies ICT, life sciences, tourism, agri-food, creative and culture as key areas for economic development. These areas are similarly identified in the RSES (refer S4.4) as having regional significance. The policy objectives outlined ED6.1-6.7 propose inter alia, to provide for sufficient zoned land, alignment of population and employment, (reference should be made to NPO1C the overarching guideline in the NPF that job creation should follow population increase at a ratio of 0.66/1), integration of infrastructure services, regeneration of cores and establishment of remote working hubs. This is consistent with the regional strategy set out in RPO 4.23-4.26 and 4.40-4.44 for example.

The chapter goes on to examine retail strategy and sets out the by now well accepted principles of adherence to the retail planning guidelines the importance of town centres and the prioritisation of filling commercial vacancies. These are set out in policy objectives ED 6.11-6.14 and are consistent with similar regional policy objectives RPO 4.45-4.48. The Regional Assembly supports the provision of retail shops in rural areas where they service the community particularly in relation to convenience goods and a development objective to this effect would be welcome.

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The chapter then sets out policy objectives for the extractive industry and that winning aggregates would follow good environmental practices. The Regional Assembly have no comparable policy objectives. The final topic covered in the economic development chapter is tourism which has been identified as a key area, the policies promote collaboration with stakeholders, walking and cycling activities and the attainment of an UNESCO accredited biosphere for Lough Ree and the mid Shannon Wilderness Park refer policies ED 6.20-6.28. The Regional Assembly have similar policy objectives refer RPO 3.7.8, RPO 4.1-4.3-4.13 and the DRCDP would be consistent with these. The Regional Assembly have an objective RPO 5.3 which supports the consideration of a national park/national recreational area in the area surrounding Lough Arrow/ Lough Key, it asks that RCC consider including a similar objective in order to strengthen consistency.

Chapter 7 deals with infrastructure, transport and communication. The achievement of integrated land use and transport along with sustainable travel and local transport plans for Roscommon and Athlone are key policy objectives. There is also extensive support for the provision of public transport, refer to policy objectives ITC 7.1-7.11, CAEE 8.17- 8.19.

The chapter goes on to identify national road improvements and a by-pass of Roscommon Town should specifically be included for the N61 as it is one of the few key towns in the region without such a resource. The proposed improvements to regional and local roads are scheduled, there are no timeframes attributed to these projects. These would be useful for monitoring purposes and the council may reconsider its approach in this regard, together with identification of the cycling facilities it is proposing to develop.

The above approach is generally consistent with regional policies refer to RPO 6.6-6.8 roads, 6.18-6.24 bus and rural transport. The Regional Assembly has a particular interest in rail and this has been subject to much debate in the chamber and online during and after the adoption of the RSES. The DRCDP devotes one paragraph to rail and whilst it acknowledges some of the objectives in the RSES it does not include any in the section. The Regional Assembly ask that the council consider the inclusion of RPO 6.12 (upgrade Athlone-Galway) 6.14 (smarter travel), 6.16 (North West city region feasibility) and 6.17 (electrification) in order to increase consistency with the RSES.

The final two subsections with respect to transport deal with EVs and cycling and walking, refer ITC 7.21-7.28. These are consistent with the regional policies 6.28-6.33. The council is proposing discrimination in favour of EVs with respect to parking in town centres. In order to facilitate future monitoring, targets for charging points would be helpful.

The next infrastructure examined is water services. The development objectives for water supply propose collaboration with IW on infrastructure provision, protection of sources and water conservation refer ITC 7.29-7.34. These are consistent with similar regional policies RPO 8.12-8.17. The council may consider making particular reference to the Rural Water Program and that all ground water supply sources have a protection plan in order to ensure greater consistency.

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The development objectives for wastewater ITC 7.35-7.41 are similar to regional policies RPO 8.15, 17, 21. There is a greater emphasis on achieving high standards for new development and the Regional Assembly recommend that RPO 8.21 be given particular reference with the elimination of combined sewers being prioritised. The provision of specific infrastructure for Athlone should be included refer RPO 3.7.13.

The last part of water services examined is surface water drainage and flood risk. The development objectives ITC 7.42-7.51 are consistent with similar regional objectives RPO 8.20-8.23 and RPO 8.12, 13. Unlike the road transport section there are no specific projects selected for implementation during the lifetime of the plan. The Regional Assembly suggest that inclusion of such would aid monitoring and would help inform the communities in the county how their area will develop. The policies and objectives in relation to waste management ITC 7.52-7.56 are consistent with those in the RSES, refer RPOS 8.8-8.11. The DRCDP policies could be expanded to give guidance on the siting of waste infrastructure and the proximity principle refer S8.4 of the RSES.

The policies for ICT infrastructure ITC7.58-7.61 support the NBP and mobile communications infrastructure. The NBP policies are similar to those in the RSES RPO 6.36-6.40, the council could consider an objective similar to RPO 6.37 with respect to provision of infrastructure in new development.

Chapter 8 examines climate action, energy and environment. Climate change is identified as being of critical importance for everybody and this chapter will outline the responses of the council to the issues which are similarly highlighted in the NPF and RSES. The chapter supports the establishment of decarbonising zones but does not identify their location in Roscommon. The chapter goes on to describe the Roscommon Climate Adaptation Strategy 2019-2024. The RSES has climate change as a recurring cross-cutting theme throughout the strategy. The chapter next examines renewable energy and electricity generation the development objectives are outlined CASE 8.3-8.13. These policies are broadly consistent with the RSES, refers RPOS 4.16-4.22. The Regional Assembly would ask that a particular reference be given to RPO 4.16 relating to the identification of renewable energy sites of scale and that whilst every effort has to be made to protect designated sites there should not be an automatic rejection of proposals to locate renewable energy developments in them (CAEE 8.7).

The next section in the chapter is green spaces. The policies support energy efficiency and provision of green infrastructure CAEE 8.14 – 8.16, these are consistent with objectives in the RSES, refer RPO 4.21.

The next part of the chapter deals with transport and this has been examined previously in this report. Agriculture is examined next with an emphasis on collaboration with the farming community with respect to reduced GHG, CAEE 8.20 – 8.21. These are similar to policies of the Regional Assembly RPO 4.26. The Regional Assembly recommends that the Council consider the role of the bio-economy in future agriculture development, refer S. 4.4 of the RSES.



The next section in Chapter 8 deals with nature based solutions, peatlands and wetlands. The policies CAEE 8.22 – 8.28 are consistent with RPO's 5.5 – 5.8 and our overarching environmental objectives ref. S 1.5 of the RSES. The Regional Assembly recommend that the Council consider inclusion of RPO 5.4 (site specific conservation objectives) or something similar in order to bring more certainty to development options. It would be informative if the degraded lands to be preserved and restructured were identified by the Council in order to aid monitoring and implementation (refer pg. 113 RDCDP). The Council in S 8.6 has identified successful projects already completed around energy efficiency e.g. solar panels in fire stations in Roscommon and Castlerea, purchase of EVs and development of cycle routes. It would be useful and informative for citizens if projects to be completed during the life of the plan were identified and recorded.

Chapter 9 deals with built heritage. It makes reference to the RPS and the 6 ACAs in the county. The special interest of the ACA should be identified where they have not been described. The policies BH 9.1 – 9.13 are more detailed than those in the RSES and are consistent with the regional policies, refer RPO 4.6, 5.14 – 5.17. Clonalis House in Castlerea is an important country house with a long history and it could be referenced in S. 9.6 of the DRCDP. The Rathcroghan Archaeological complex gets a very cursory account in the Draft and the work done previously by the Minister for Arts and Heritage is not referenced. The downgrading of the N5 within the lifetime of the plan will bring developmental pressures in this area and the Council may consider continuation of the policies 6.12-6.14 and objectives 6.28 – 6.31 from the current county development plan.

Chapter 10 deals with natural heritage. It outlines designated sites, NHAs, geological sites and sets out protection policies NH 10.1 – 10.8. These are consistent with similar policies in the RSES, in particular the overarching environmental objective in S. 1.5. The chapter next outlines policies for woodlands, peatlands and wetlands and inland waterways, NH 10.10 – 10.16, these are consistent with the policies in the RSES refer RPOs 5.5 – 5.6. The DRCDP policies above are transferable to urban habitats.

The next subsection deals with landscape character, an assessment of which accompanies the draft. The policies in the Draft NH 10.20 – 10.21 are consistent with those in the RSES refer RPO 5.2. There is no reference to 5.2 (b) however relating to co-operation between local authorities and the Regional Assembly recommend that reference to this be made. It may also be relevant in the selection of sites of scale for renewable energy projects. The final subsection in this chapter relates to green infrastructure and the development objectives NH 10.22 – 10.25 are consistent with those in the RSES, e.g. RPO 3.5.

Chapter 11 deals with community facilities, social inclusion, education, healthcare, childcare recreation, public rights of way, fire services, libraries and burial grounds. The latter four are not included in the RSES, the remaining items are examined in chapter 7 – our Quality of Life/Inclusive Region Chapter.

The DRCDP refers to the PPN and SICAP and the development of community facilities with an emphasis on towns and villages it does not have a schedule of projects to include in the plan. The policies for education SCCD 11.5 – 11.7 are consistent with the policies in the RSES RPO 7.1 – 7.9, there is an emphasis in the DRCDP on land use policies These use the population projects from the Core Strategy which, as we discussed previously has a large bias in favour of urban areas, this translates itself into the provision of new primary and secondary schools places and would not, in the opinion of the Regional Assembly, accord with the common good.

The policies on health care SCCD 11.8 – 11.9 support the improvement of health care facilities for all members of the community, these are consistent with the policies in the RSES PRO 7.8 – 7.10. The Regional Assembly recommends that reference be made to public health policy documents Healthy Ireland, the National Physical Activity Plan and the National Obesity Plan in order to ensure better consistency with the RSES (refer RPO 7.11). The Regional Assembly also recommends the inclusion of a policy on the zoning of lands for Nursing Homes (refer RPO 7.14).

The next subsection examines childcare provision and recreational space and sets out policies for the provision of facilities SCCD 11.10 – 11.13

These are consistent with policies in the RSES which are distributed throughout the document and include inter alia the following RPO 3.7.4, 3.7.12, 3.7.50 recreation facilities in regional growth centres RPO 4.1, 2 recreational trails, RPO 5.3, 19, 23 National Parks, Outdoor Recreation, Regional Fora peatlands RPO 9.2 active travel.

Chapter 12 is the development management chapter which provides a comprehensive overview of the requirements for all types of development. The Regional Assembly commend the Council for this and suggest that the carparking requirements be re-examined in light of the compact development, changed use patterns and increased use of public transport.

Monitoring and Implementation

This aspect of the Plan is discussed in S 1.7 and sets out the statutory requirements for same. There are no policies or objectives proposed. The Regional Assembly devoted chapter 10 of the RSES to implementation and has inter alia adopted 4 RPOs (10.1 – 10.4) to deliver appropriate monitoring and has set up an oversight committee to that end.

The Regional Assembly recommends that the monitoring proposal be re-examined to see if it could be strengthened and to increase its consistency with the RSES.

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Volume II of DRCDP

Introduction:

Volume II includes 4 settlement Plans for some of the towns in the county, 28 village Plans and two area Plans, Lough Key and Barrymore. The above plans do not have any direct comparators in the RSES as the Regional Assembly only provided detailed planning for MASP, the Regional Growth Centres and to a lesser extent the key towns. The DRCDP does not provide much spatial planning in relation to the Regional Growth centre (Athlone) or the key town (Roscommon) and this, not unlike some other counties, is a weakness and it could be 2023 before the most important urban settlements in the county have plans with zoned land. The Regional Assembly does not, in this report, propose to analyse in detail the various settlement plans and will confine its analysis and commentary to general and high-level issues.

The zoning plans in the volume are all shown on maps that are not to scale which is of course a contradiction in terms as in the absence of a scale they are not plans at all. The 'maps' are very difficult for ordinary members of the public to comprehend as they appear split on succeeding pages and there is no joined up depictions on the digital version of the Draft. The 'maps' contain significant areas of white or un-zoned land which is described as an innovative zoning strategy. This practice has been a feature of Roscommon County Development Plans in the last century and was dispensed with in the early part of this century for a more detailed specific plan led approach.

The plans have policies for the type of uses that may be appropriate in different areas but there is little spatial certainty as to where facilities may be developed. There is a general prohibition on multi-unit residential development in outer core areas for example despite such already being a feature of such areas and indeed more peripheral areas than the outer core. There is no economic appraisal of the effects of such a policy and the loss of economies of scale associated with multi-unit development and value for money from lands that are already serviced or easily serviced from existing infrastructure.

The zoning plans are very simple and generally have only four identified zonings (town core, outer core, industrial, new residential) for development purposes. Settlements today are generally more sophisticated in their actual land uses and in Ballaghaderreen for example there are 15 land uses in its current LAP. This situation is replicated for other settlements. There are two 'maps' for each area plan showing zoning and on one and flood risk on the other, there are 20 maps associated with the current Ballaghaderreen LAP (2017 – 2023) which provide a lot of relevant spatial information for citizens.

The Regional Assembly is particularly interested in Hodson Bay/Barrymore Area Plan as it is currently the closest area of zoned and serviced land to the Regional Growth Centre of Athlone. The Area Plan runs to 5 pages, the current LAP runs to many multiples of this. Barrymore is currently classified as a tier 3 settlement in the CDP 2014 – 2020 on a par with Strokestown, Elphin and Cortober, these settlements retain their 3rd tier status whilst Ballymore is relegated to a tier 4 settlement as a serviced village. There is no rationale given for the demotion.

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In addition, the only land zoned for development is Leisure/Tourism and 50% of this is currently green belt, there is no explanation as to why there is such a marked increase or what is the development intention especially as all this additional area is un-serviced as regards sewerage and is in very close proximity to designated sites. It is also at risk of flooding, there is no reference to a justification test in relation to these lands. There is no land zoned for residential development in Barrymore despite there being significant areas of zoned and serviced land, indeed the WWTP in Barrymore has more unused capacity than any other area in the county.

The SFRA examines some of the area plans and we will include some comments on this in this section for convenience. The Regional Assembly note that the SFRA does not contain any assessment of Athlone or provide spatial details of works contemplated in flood relief schemes. The maps in Appendix II do not provide usable information at settlement level and do not fully inform the public. The PFRA maps are not the latest available mapping and the council should consider using the latest published mapping from the OPW in Appendices II and III. The ground truthing carried out for the area plans and set out in Table 4 could better inform the public if they were mapped.

In relation to the justification test there are undeveloped lands zoned in Ballaghaderreen, Castlerea, Elphin and Strokestown. There may be a similar situation in Hodson Bay/Barrymore, there are no flood risk maps included in this area plan. The Regional Assembly suggest that the SFRA be re-examined and a revised version prepared which includes justification tests and thus better informs the public.

Conclusion:

The Regional Assembly is generally satisfied that the DRCDP is consistent with the policy objectives in the RSES. It is proposed, for ease of reference, to outline below those areas which it is the opinion of the Regional Assembly that consistency has not been achieved and to provide observations where the Regional Assembly considers that improvements could be included to make the adopted development plan a better document from a planning perspective. The information below will follow the chapter headings in the DRCDP and have already been described and discussed in the report above.

Recommendations:

- 1 That a development objective be included similar to RPO 7.717 that ensures that the quantum of housing being proposed in the plan meets the needs of urban and rural communities.
- 2 That the target for new housing in the Regional Growth Centres constructed within the existing built-up footprint be set at 40%.
- 3 That a development objective for a target of 20% of rural housing to be constructed on brownfield sites be included in the plan.
- 4 That a population target of 1,500 by 2031, for that part of the Athlone Regional Growth Centre within County Roscommon, be included in the plan as a development objective. This would be the equivalent of an 1,100 target by 2027.

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- 5 That RPOS 3.7.2 – 3.7.19 be included as development objectives to ensure that the County Development Plan is consistent with the RSES with respect to the development of Athlone.
- 6 That a commitment is given to a targeted review of the classification of landscape character to ensure consistency across adjoining local authority boundaries as provided within RPO 5.2.
- 7 That RPO 5.3 which supports the consideration of a national park/recreational area around Lough Arrow/Lough Key be included as a development objective in the CDP.
- 8 That the following RPOs, in relation to rail infrastructure, be included as development objectives to ensure consistency: RPO 6.12 (upgrade Athlone-Galway line), 6.14 (smarter travel), 6.16 (North West City Regional feasibility study) and 6.17 (electrification).
- 9 That a specific development objective be included to acknowledge the role of the Council in managing the Rural Water Program and preparing groundwater protection plans for all public water sources.
- 10 That RPO 8.21 be given a specific reference with the elimination of combined sewers being prioritised.
- 11 That RPO 6.37 (infrastructure for broadband) be included in the CDP to ensure consistency.
- 12 That RPO 4.16 relating to the identification of renewable energy sites of scale be included in the DRCDP.
- 13 That RPO 5.4 (site specific conservation objectives) be included in the plan to increase consistency and to bring more certainty to development options.
- 14 That RPO 7.11 (reference to policy documents for health) and RPO 7.14 (zone lands specifically for nursing homes) be included in the new plan in order to ensure consistency.
- 15 That the RPOs 101 - 10.4 (implementation and monitoring) or similar development objectives be included in the plan.

Observations:

- 1 Should the Draft Plan be adopted in its present form there will be an absence of zoned lands and policy direction for Roscommon Town. The planning authority should consider options to fill this vacuum and provide greater certainty, enabling planned sustainable development to occur.
- 2 The policy for the provision of serviced sites be extended to small towns and that elaboration on timeframes for identification of specific areas take into account the timeframes in the RSES.
- 3 The Regional Assembly would urge the Council to give the same status to Creagh as a linked settlement with Ballinasloe and Hodson Bay as a linked settlement with Athlone as it is proposing to give Cortober as a linked settlement with Carrick-on-Shannon.
- 4 The Regional Assembly would urge the Council to include in its development plan the criteria used to define the extent of Regional Growth Centre plans. These were already used in Sligo and Letterkenny and if applied to Athlone would ensure a consistent Regional Approach.



- 5 Further clarification/review of the methodology used for designation of rural housing area types that accord with the statutory guidelines may be of benefit within the context of the Rural Housing Guidelines and NPF – this should include clarification regarding the interchangeability given to the percentage commuting and percentage employed.
- 6 The Regional Assembly would urge that reference be made to the Realising our Rural Potential - Action Plan for Rural Development, 2018, in addition to reference to the CEDRA report.
- 7 The Regional Assembly would welcome reference to the creation of a forestry forum and hope that the council would be part of it.
- 8 The Regional Assembly would urge that reference to NPO1c the overarching guidance in the NPF that job creation should follow population growth at a ratio of 0.66/1.
- 9 The Regional Assembly would urge that the Council include timeframes and maps for projects scheduled for regional and local roads and similar information with regard to cycling facilities.
- 10 The Regional Assembly would encourage any specific surface water drainage and flood risk projects to be implemented over the lifetime of the plan to be identified and timelines provided.
- 11 The Regional Assembly urge the Council to identify targets for EV charging points in order to facilitate monitoring.
- 12 The Regional Assembly urge the Council to include guidance on the siting of waste infrastructure and the proximity principle after having regard to Section 8.4 of the RSES.
- 13 The Regional Assembly urge that the Council reconsider the proposal to automatically reject proposals for renewable energy developments in designated sites and that consideration for them could be given if they did not have adverse impacts of the qualifying interests for the sites.
- 14 The Regional Assembly urge that the Council identify energy efficiency projects that may be delivery during the lifetime of the plan in order to better inform citizens and to aid monitoring.
- 15 The Regional Assembly urges that the policies in the existing CDP 6.12 – 6.14 and objectives 6.28 – 6.31 which afford protection to the Rathcroghan Archaeological Complex be retained in the new County Development Plan.
- 16 The Regional Assembly urges that minimum car parking requirements be re-examined in light of compact development, changed patters of use and use of public transport.

If you have any queries in respect of the above observations, then do not hesitate to revert.

Is mise le meas,

David Minton
Director