



Forward Planning Section
Roscommon County Council
Aras an Chontae
Roscommon
F42 VR98

Via online portal: www.rosdevplan.ie

06/06/2024

RE: PROPOSED MATERIAL ALTERATIONS TO THE DRAFT ROSCOMMON TOWN LOCAL AREA PLAN 2024-2030

A Chara,

I refer to your notification on 14 May 2024 of Roscommon County Council's proposal to make material alterations to the Draft Roscommon Town Local Area Plan 2024-2030 and thank you for the opportunity to make this submission.

The Draft Roscommon Town Local Area Plan 2024-2030 (draft LAP) was published in mid-December 2023, and the Northern and Western Regional Assembly (the Assembly) was notified formally on 15 December 2023. The Assembly made a submission to draft Plan on 30 January 2024, making the following three recommendations and four observations -

Recommendations

- The Plan is 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 the accommodation of new enterprises / employment related uses within Sec. 5.7 of the RSES (Key Future Priorities for Roscommon Town).*
- The Local Area Plan is accompanied by a Local Transport Plan which corresponds with the Land-Use policies contained for Roscommon, and which reflects the wider ambition of the RSES via RPO 6.27.*
- The Local Area Plan is 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*

Northern & Western Regional Assembly
The Square, Ballaghaderreen, Co. Roscommon

Tionól Réigiúnach an Tuaiscirt agus an Iarthair
An Chearnóg, Bealach an Doirin, Co. Ros Comáin

+353 (0)94 9862970

+353 (0)94 9862973

info@nwra.ie

visual representation of such projects could be considered to illustrate such projects/developments.

Observations

1. *The draft Plan boundary does not reflect the “Built Up Area” as defined by Census 2022. A review of the boundary should be undertaken to include existing clusters / neighbourhoods within the draft LAP area.*
2. *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.*
3. *Consideration should be given to zoning ‘Un-zoned’ or ‘White Lands’ for particular purposes, such as Agricultural, Community Infrastructure or Green Network.*
4. *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.*

Having reviewed the Chief Executive’s Report on the draft LAP submissions and the proposed Material Alterations documentation it appears that the Recommendations and Observations made by the Assembly, while considered, have resulted in limited change to the draft plan (i.e. no material alterations being proposed or have not been addressed sufficiently in the proposed Material Alterations). There is one exception to this, whereby Unzoned White Lands are now proposed to be zoned for particular purposes.

THE PROPOSED MATERIAL ALTERATIONS

59 material alterations are proposed for the draft LAP.

A number of alterations relate to amendments to land use zoning, with some resulting in consequential amendments to the draft LAP boundary and Table 11.1 Land Use Zoning Extents. The land use zoning map with the proposed Material Alterations is contained in Appendix 1 of this report. There are also five proposed amendments to the Land Use Matrix.

The remainder of the proposed alterations amend text/policy/maps in the draft LAP relating to - implementation and monitoring; Mote Park; housing yields (densities); insertion of existing and new guidelines; vacancy/dereliction; social enterprise; funding; back land areas; tenure; design; removal of 3 Opportunity Sites; transportation; water services; archaeology; architecture (Architectural Conservation Area and Record of Protected Structures); climate action; flood risk; inclusion of indicative road links; protected views and some amendments to typos/text corrections.

Having examined the proposed material alterations to the draft LAP and the associated documentation, the following observations are made in the context of (i) the proposed material alterations; (ii) the Assembly's submission to the draft LAP and (iii) the Regional Spatial and Economic Strategy 2022-2032 (RSES):

1. The proposed LAP boundary has been extended. The proposed extension is welcomed where it includes existing built-up areas of the town. However, the following proposed material amendments are highlighted for further consideration:
 - The land northeast of the town with proposed zoning as Strategic Industrial / Enterprise Zones (MA 45) is standalone and partially located in Flood Zone A. The local authority has estimated that 28 hectares of undeveloped lands are available for industrial / enterprise. Therefore, it is considered that the inclusion of these lands in the LAP is not justified and should not be included.
 - Land south of the town (MA 43) with proposed zoning as New Residential is partially located within Flood Zone A and should not be included.
 - Land south of the town (MA 50) with proposed new zoning as New Residential is partially located within Flood Zone B. It is noted that an unfinished housing development is located on part of the land and the implication of potential flooding should be carefully considered.
 - Land southwest of the town (MA 30) is proposed to be zoned as New Residential and the rationale/justification is unclear and the implication for delivery of compact urban growth should be considered.
 - There is archaeology on land with proposed zoning as New Residential northeast of the town (MA 46) and it may be appropriate to amend this to exclude the area of the archaeological feature and any zone of influence at this location from the residential zoning.
2. The inclusion of the reference to the Sustainable Residential Development and Compact Settlement Guidelines for Local Authorities (2024) and the application of the principles of the guidelines, including the proposed approach to housing yields and densities in line with said guidelines (MA 4, MA 5 and MA 28), are welcomed as they promote compact urban growth as set out in RPO 3.1i of the Regional Spatial and Economic Strategy 2022-2032.
3. It is noted that the proposed material alterations will result in 23.9 hectares of land zoned for residential use (19.02 hectares of New Residential and 4.7 hectares of Residential Opportunity Sites). The draft LAP stated that 17.15 hectares of land are required for the population growth envisaged in the LAP period. With other opportunities for residential development in the Town Core and Outer Town Core zonings, along with reuse and regeneration and the application of the Sustainable Residential Development and Compact Settlement Guidelines for Local Authorities (2024), there appears to be adequate land zoned for residential development.

4. The proposed alterations to the land use zoning matrix (MA 53 – MA 57 (both inclusive)) would strengthen achieving compact urban growth in Roscommon town and are welcomed.
5. It is noted that it is proposed to remove some of the Residential Opportunity Sites (MA 13, MA 14 and MA 15). Justification is given for MA 13 whereby the GRETB intends to extend its premises to include a training college. Further consideration should be given to not removing the classification of Residential Opportunity Sites at both MA 14 and MA 15 as both areas would support residential development and compact urban growth in the town core subject to proper planning and sustainable development.
6. There is no Local Transport Plan (LTP) prepared for the draft LAP area nor is it included as a proposed material alteration. RPO 6.27ⁱⁱ and RPO 6.28ⁱⁱⁱ of the Regional Spatial and Economic Strategy 2022-2032, and ITC 7.31^{iv} of the Roscommon County Development Plan 2022-2028 provide for the preparation of a LTP for Roscommon town, with policies, objectives and measures which emerge from Local Transport Plans to be incorporated into frameworks, plans and schemes including Local Area Plans. However, it is noted that a Roscommon Town Approaches and Movement Study was prepared in c.2023 and it was recommended to publish this study as part of the supporting documents to the draft LAP, along with including supporting objectives, in the Chief Executive's Report on the Submission Received on the draft LAP (p30-p31). However, the recommendations do not appear to have been brought forward as a proposed material alteration to the draft LAP. At the very minimum there should be an objective included in the draft LAP to prepare a LTP (using/updating the information contained in the Roscommon Town Approaches and Movement Study where relevant) within six months of the adoption of the draft LAP and the LAP varied within 6 months thereafter. Proposed material amendments MA16, MA17 or MA18 could be further amended to include this objective.
7. There appears to be no specific or prioritised projects proposed for Roscommon town listed in the draft LAP area over the plan period. While not explicitly stated in the Planning & Development Act 2000 (as amended), Local Area Plans provide for locally tailored and site-specific objectives and actions, in response to a town's unique assets, features, circumstances and needs and are an enormous opportunity to bring to life the objectives of the County Development Plan at a local level. Therefore, it is expected at this level of plan-making specific and prioritised projects and actions for delivery in Roscommon town would be identified and included in an LAP. For example, reference is made to "Putting the Spokes Back in the Wheel" project (which consists of a linear park, cycleways and pedestrian connections project) in the Chief Executive's Report. Projects like these should be identified and indicatively mapped. As outlined in the Regional Spatial and Economic Strategy 2022-2032, Key Towns have the potential to accommodate a significant level of

growth in population and employment through appropriate investment in infrastructure, support services and placemaking initiatives. Furthermore RPO 4.9^v, RPO 4.11^{vi} and RPO 3.5^{vii} refer to the provision and/or identification of accommodation, facilities and infrastructure (including green infrastructure) for Roscommon town.

It is considered important to identify projects and actions for delivery to inform the citizens of the Roscommon town and its hinterland, to attract people and businesses into Roscommon town, and it may also be critical to identify such projects in a Local Area Plan to enable them to avail for funding opportunities in the future.

RECOMMENDATIONS

- A. To strengthen compliance with RPO 3.1 of the RSES, it is recommended that proposed material alteration MA 14 and MA 15 (removal of Residential Opportunity Sites) not be made. Furthermore, it is considered that land southwest of the town (MA 30) with proposed zoning as New Residential may negate the objective to deliver compact urban growth and the proposed material alteration should not be made unless it can be demonstrated through the Core Strategy that the land is required for residential use over the plan period.
- B. In order to comply with RPO 3.10^{viii} RPO 3.11^{ix} of the RSES it is recommended that material amendments MA 43 and MA 45 are not made, as both parcels of land have been identified as being in/partially in Flood Zone A. In addition, further consideration should be taken on proposed amendment MA 50 which although it contains an unfinished housing development, it has been identified as being partly located within Flood Zone B.
- C. There is a Recorded Monument on land with proposed zoning as New Residential northeast of the town (MA 46) and it is recommended that it would be appropriate to further amend this proposed material alteration to exclude the area of the archaeological feature and any zone of influence at this location from the residential zoning and to update the Land Use Zoning Extent table and New Residential Lands table accordingly.
- D. In order to comply with RPO 6.27 and RPO 6.28 of the RSES and ITC 7.31 of the Roscommon County Development Plan 2022-2028, it is recommended that proposed material alterations MA 16 or MA 17 or MA 18 is further amended to include an objective that states that a Local Transport Plan (LTP) will be prepared for the town of Roscommon and the Local Area Plan will be amended to include objectives arising out of the LTP. The entire process will be carried out within twelve months of the adoption of the LAP.

OBSERVATION

It is considered that the lack of specific and prioritised projects proposed for Roscommon town within the draft LAP area over the plan period has been a lost opportunity to: inform current and future citizens, business and other interested parties of Roscommon town and its hinterland of future development proposals for the town; and to potentially attract people and businesses to Roscommon town; and for the local authority and relevant agencies to have identified and prioritised proposals to apply for future funding opportunities. Where there is an opportunity to include such projects/proposal through altering an amendment, this should be considered; or alternatively a commitment made in the draft LAP to vary the LAP in the coming months to include such plans/proposals.

In conclusion, the Assembly recognise that the draft LAP supports the concept of compact urban growth and is therefore generally consistent with this element of the RSES. However, the Assembly is of the opinion that incorporating the recommendations and observations made to the Draft Plan and hereinabove would benefit the plan and would result in a greater consistency with the RSES. This will ensure Roscommon town, designated as a Key Town and Key Destination Town in Ireland's Hidden Heartlands, can act as a regional driver that complements and supports the higher-order urban areas within the settlement strategy of the RSES and supports the tourism sector in a sustainable and descriptive manner.

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

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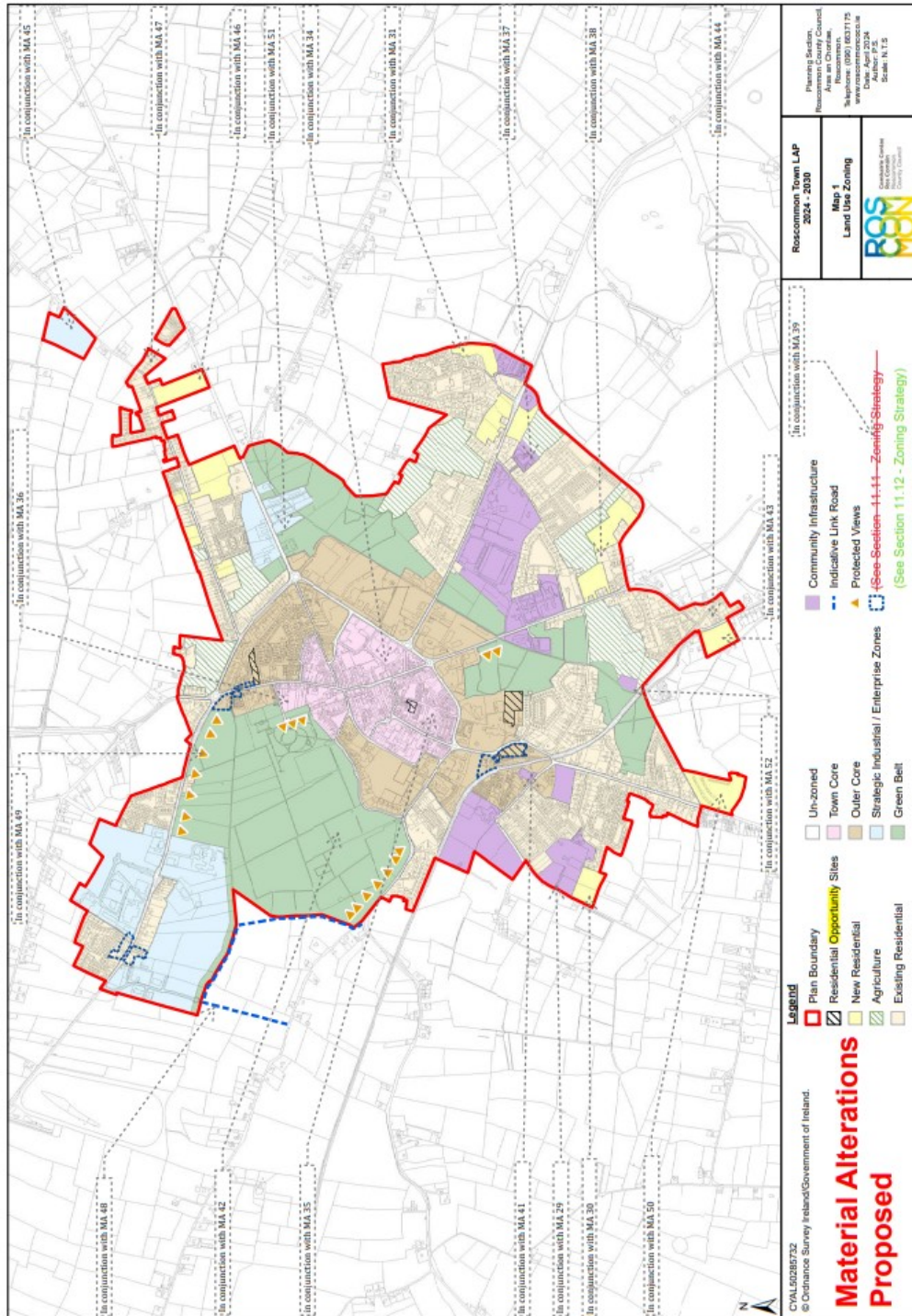


Denis Kelly
Director

APPENDIX 1 – LAND USE ZONING MAP AND PROPOSED MATERIAL ALTERATIONS

(Source: Roscommon County Council proposed material alteration documents)

i RPO



Northern and Western Regional Assembly
 The Square, Ballaghaderreen, Co Roscommon

3.1 Develop urban places of regional-scale through: > Delivering on the population targets for the Metropolitan and Regional Growth Centres through compact growth: > Delivering significant compact growth in Key Towns; and > Developing derelict and underutilised sites, with an initial focus within town cores.

ⁱⁱ RPO 6.27 (a) 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, for Athlone, Letterkenny, Sligo Town, Cavan Town, Monaghan Town, Castlebar, Roscommon Town, Ballinasloe, Carrickon Shannon, Donegal Town, Tuam, Ballina and other areas as may be determined. The LTP will inform the urban area plans, development plans, local area plans and other planning framework documents. (b) Local Transport Plans (LTP) will represent the lowest tier of the NPF's framework for the integration of land use and transport planning and the achievement of the NPF's objective of 'compact smart growth'. They will be subject to further transportation and environmental assessment at local level as appropriate based on guidance available and alignment with environmental policy. (c) LTPs will be based on a clear set of objectives and the most recent demographic and travel information taking into account the policies and objectives of the local authorities, insofar as they align with those of National and Regional Policy. (d) Local Link Offices RPO

ⁱⁱⁱ RPO 6.28 Policies, objectives and measures which emerge from Local Transport Plans shall be incorporated into Development Plans, Local Area Plans, Strategic Development Zone Planning Schemes. Urban Area Plans and other relevant planning framework documents.

^{iv} ITC 7.31 Prepare Local Transport Area Plans for Roscommon town, Carrick-on-Shannon and Boyle based on the Area Based Transport Assessment guidance of the National Transport Authority and Transport Infrastructure Ireland.

^v RPO 4.9 To ensure provision is made for the expansion in accommodation, and facilities within key destination towns, such as Carrick on Shannon, Cavan, Roscommon Town and Athlone, 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.

^{vi} To upgrade Public Transport infrastructural facilities in Destination Towns, including the provision of Transport Hubs/Links, and additional accommodation.

^{vii} RPO 3.5 Identify and develop quality green infrastructure, within and adjacent to City, Regional Growth Centres and Key Towns.

^{viii} RPO 3.10 Ensure flood risk management informs development by avoiding inappropriate development in areas at risk of flooding and integrate sustainable water management solutions (such as SUDS, non-porous surfacing and green roofs) to create safe places. Development plans should assess flood risk by implementing the recommendations of the Planning System and Flood Risk Assessment Guidelines for Planning Authorities (2009) and Circular PL02/2014 (August 2014).

^{ix} 3.11 Local Authorities, DHPLG, OPW, and other relevant Departments and agencies to work together to implement the recommendation of the CFRAM programme to ensure that flood risk management policies and infrastructure are progressively implemented.