

Planning Department,
Roscommon County Council,
Áras an Chontae,
Roscommon,
F42 VR98.

14th January, 2022

RE: Report on the Proposed Material Alterations to the Draft Roscommon County Development (DRCD) Plan 2021-2027

A Chara,

I refer to the notification received from Roscommon County Council on 7th December, 2021 advising of the proposed Material Alterations (MAs). The Northern and Western Regional Assembly wish to thank you for notifying it of this.

There are 75 proposed MAs in Volume 1, many of these are relatively minor, involving additional narrative and references to technical documents or updated technical guidelines. It is noted that the Council decided that the proposed material alternations required an SEA and AA and that there are updated reports in relation to these published on your website. The consideration of the Assembly is on alterations that have regional significance and whether in the opinion of the Assembly they are consistent or otherwise with the RSES. These are referenced below and other proposed Material Alterations including those in other Volumes, that are not commented upon below are considered to be relatively minor and would generally be supported by the Assembly.

Proposed Material Alterations:

MA 1 – This proposal includes a new core strategy table. There is a decrease in the population growth from the Regional Growth Centre (RGC) of Monksland and the self-sustaining Growth Towns of Boyle and Carrick-on-Shannon (Cortober). There is an increased population growth for Roscommon Town. The remaining towns of Castlerea, Ballaghaderreen, Strokestown and Elphin remain the same. There is no change to overall population growth for villages. There is an increase in population growth for rural areas.

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The Assembly notes the inclusion of figures for 2031 for all the settlements, except the villages. The concerns of the Assembly outlined in its previous report remain in relation to population growth targets. The targets in the RSES of at least 40% and 30% increases for Regional Growth Centres and Key Town respectively related to 2040 and were to allow balanced growth elsewhere within each county. The figures in the DRCDP front load these figures to be achieved mostly by 2027 and completely by 2031. These ambitions as presented do not resolve the concern of the Assembly regarding balanced growth and thus inconsistency with the RSES. There is no evidenced rationale presented in the reports to justify the projected figures proposed, for example, the populations of Monksland or Roscommon Town exceeding rates needed to achieve the targets by 2040.

MA 5 – This proposal to amend the settlement strategy with designation of towns in Roscommon from self-sustaining Growth Town and self-sustaining Town to self-sustaining Growth Towns. The towns are sub-divided then into those with populations greater than and less than 2,000. It may benefit the plan to provide a rationale for the apparent distinction based on population alone, taking cognisance of the NPF definition of an urban area as being those with a population above 1,500.

MA 6 – This proposal amends Map 2.1 to include areas to the east and northeast of Boyle as being areas under urban influence. The Assembly notes that the CSO has categorised these areas as being under moderate urban influences or remote areas and it may be of benefit to provide further rationale to clarify/justify same – this is an issue that appears to arise in respect of other parts of the county designated as being under urban influence.

MA 7 – This is a proposed amendment to the settlement strategy that requires 40% of all new housing in Monksland to be within the built-up footprint. This accords with the RSES.

MA 8 – This proposed amendment relates to active land management with an emphasis on vacancy. This is consistent with the policies in the RSES.

MA 10 – This proposed amendment is to include strategic Objectives for Athlone into the plan. This is welcomed by the Assembly but it only includes 4 objectives which are consistent with those in the RSES. There are however 19 objectives in the RSES with respect to the Regional Growth Centre of Athlone. The inclusion of selected objectives in itself is consistent with the RSES but the exclusion of so many relevant objectives mean there is an inherent inconsistency between the Draft Plan and RSES.

MA 11 and MA 12 include strategic objectives for Roscommon Town and Boyle that are consistent with the RSES.

MA 17 – This proposed MA is to include an objective to monitor new rural housing to ensure 20% is located in brownfield sites. This is welcomed by the Assembly and is consistent with regional objectives.

MA 18 – This proposed MA clarifies that serviced sites can be provided in all towns and villages with a population less than 2,000. This is welcomed by the Assembly and is consistent with RSES objectives.

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MA 22 – This proposed MA supports the night-time economy in town centres and areas adjacent. It would be informative if the areas were mapped so that the public would be better informed but nonetheless it is consistent with the RSES.

MA 25/26 - This proposed MA includes text which recognises that agriculture is more than an economic activity and has important social and cultural impacts and that its continuity is important for all these reasons. Arising from this is a policy objective to support diversification of agricultural activities. This is welcomed by the Assembly and is consistent with the RSES.

MA 39 – This proposed MA includes text on LTPs and an objective to prepare LTPs for Roscommon, Boyle and Carrick-on-Shannon and prepare active travel plans for other towns. This is consistent with regional objectives and is fully supported by the Assembly.

MA 43 – This proposal includes reference to the Rural Water Programme. This is consistent with regional policy and will be a contribution to balanced local development.

MA 45 – This proposed MA recommends removal of reference to Irish Water(IW) in achieving improvement of stormwater infrastructure. The Assembly notes that IW could contribute significantly to the objective and even though they are not primarily responsible they will want to eliminate combined sewers and collaboration between both parties is mutually beneficial.

MA 49 – This proposed MA references collaboration with Eirgrid on delivering the ‘North Connacht Project’. This is consistent with regional objectives.

MA 50 & 51 and associated MA 172 & 173 (Renewable Energy Strategy) – These proposed MAs include separation distances of 1.5km from residences for bio-energy development and 10 x turbine height for wind turbines. The Assembly would have concerns that these proposals would be contrary to national policy and would also potentially inhibit domestic or smallscale installations. The proposals would be inconsistent with regional policy.

MA 54 - This proposed MA references an objective to protect and develop the Archaeological assets in Rathcroghan. This is fully supported by the Assembly.

MA 56/57 – These proposed MAs are concerned with biodiversity, in particular Annex IV species and woodland hedgerow removal and requirements for EclA for developments which may impact significantly on natural habitats. There may be benefit in providing clarity on the definition of ‘natural habitats’ as it could be open to interpretation with unintended consequences for other types of development.

Conclusion

The Assembly acknowledge the quality and clarity of the documentation published in the Draft Plan and the proposed material alterations. The task of preparing a Development Plan is extensive and detailed and the Assembly wish to thank the council for the opportunity given to engage in the process and we are available should any clarification on the submission be required.

Mise le Meas,

David Minton
Director

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