

APPROPRIATE ASSESSMENT CONCLUSION STATEMENT

FOR THE ROSCOMMON TOWN LOCAL AREA PLAN 2024-2030

for: Roscommon County Council

Áras an Chontae
Roscommon
County Roscommon



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Table of Contents

Section 1	Introduction and Background.....	1
1.1	Introduction.....	1
1.2	Legislative Requirements in relation to AA	1
1.3	AA Conclusion Statement	1
Section 2	How the findings of the AA were factored into the Plan	3
Section 3	Consideration of Alternatives	8
3.1	Limitations in Available Alternatives	8
3.2	Summary of Description and Assessment	8
3.3	Reasons for Choosing the Selected Alternative in light of Other Reasonable Alternatives Considered.....	9
Section 4	AA Determination.....	10

List of Tables

Table 1.1	Matters taken into account by the AA.....	1
Table 2.1	Measures that will protect European sites and their sustaining resources integrated into the Plan.....	3
Table 2.2	Measures from the existing Roscommon County Development Plan 2022-2028 referred to in Section 1.3.3 of the Local Area Plan.....	4

Section 1 Introduction and Background

1.1 Introduction

This is the Appropriate Assessment (AA) Conclusion Statement for the Roscommon Town Local Area Plan. The obligation to undertake AA derives from Article 6(3) and 6(4) of the Habitats Directive 92/43/EEC as transposed into Irish legislation by, inter alia, the Planning and Development Act 2000, as amended. AA is a focused and detailed impact assessment of the implications of a strategic action (such as a plan or programme) or project, alone and in combination with other strategic actions and projects, on the integrity of any European Site in view of its conservation objectives. This AA Conclusion Statement should be read in conjunction with the Plan and associated documents including the AA Natura Impact Report (NIR).

1.2 Legislative Requirements in relation to AA

In carrying out the AA for the Plan, Planning and Development Act 2000, as amended, requires, inter alia, that the Council considers the matters arrayed in the first column on Table 1.1 below. The second column identifies how these issues have been addressed.

Table 1.1 Matters taken into account by the AA

Matter specified by the Regulations	How addressed by AA
(a) the Natura Impact Report	An AA NIR accompanies this AA Conclusion Statement and the Plan.
(b) any supplemental information furnished in relation to any such report	This AA Conclusion Statement accompanies the NIR that provides additional detail on European Sites.
(c) if appropriate, any additional information sought by the authority and furnished by the applicant in relation to a Natura Impact Report	
(d) any information or advice obtained by the public authority	Submissions made during the Plan preparation/AA process were taken into account in the preparation of the final, consolidated AA NIR.
(e) if appropriate, any written submissions or observations made to the public authority in relation to the application for consent for proposed plan or project	
(f) any other relevant information	Proposed Material Alterations were screened for the need to undertake Stage 2 AA (Stage 2 AA was not required for the Alterations).

In addition to the above, the Regulations require that the Council makes available for inspection a determination regarding the outcome of the assessment with respect to whether or not the Plan would adversely affect the integrity of a European site (a copy of this determination is provided at Section 4).

1.3 AA Conclusion Statement

Non-Statutory AA guidance (Department of Environment, Heritage and Local Government, 2009) states that (Section 4.14) it *"is recommended that planning authorities include a clear and discrete AA Conclusion Statement as a distinct section in the written statement of the plan separate to the SEA statement."* This guidance recommends that the following issues are addressed by the AA Conclusion Statement:

- Summary of how the findings of the AA were factored into the Plan (see Section 2);
- Reasons for choosing the Plan as adopted, in the light of other reasonable alternatives considered as part of the AA process (see Section 3);
- A declaration that the Plan as adopted will not have an adverse effect on the integrity of European Sites (provided at Section 4); and
- The NIR (the AA NIR is accompanied by this AA Conclusion Statement and has informed the AA Determination – see Section 4).

Furthermore, as stated in the Draft "Development Plans Guidelines for Planning Authorities" (Department of Housing, Local Government and Heritage, 2021):

"...There is a similar requirement to publish a determination relating to the AA that may have been undertaken. Under Article 6.3 of the Habitats Directive the determination (often termed an 'AA Conclusion Statement') must state as to whether or not the Draft Plan would adversely affect the integrity of a European site. However as stated in Section 3.5, this determination must have been made prior to the adoption of the Draft Plan."

This AA Conclusion Statement addresses the above issues, including the signed AA Determination included at Section 4.

Section 2 How the findings of the AA were factored into the Plan

The SEA and AA team worked with the Plan-preparation team at the Council in order to integrate requirements for environmental protection and management into the Plan.

The Plan was prepared in an iterative manner whereby the Plan and AA documents have informed subsequent versions of the other. The findings of the AA were integrated into the Plan through mitigation measures. These mitigation measures ensure that the Plan will not affect the integrity of the European Sites, alone or in combination with other plans or projects.¹ The mitigation measures included in the Local Area Plan that most relevant to the protection of European sites are identified in Table 2.1 below.

Furthermore, the detailed Plan preparation process undertaken by the Planning Department for the higher-level County Development Plan, combined with specialist input from the SEA and AA processes, resulted in the integration of mitigation into that Plan that must be complied with in the Plan area. These measures are identified on Table 2.2.

Table 2.1 Measures that will protect European sites and their sustaining resources integrated into the Plan²

Sources and/or pathways for adverse effects ³	Respective Local Area Plan Development Objectives / Mitigation Measure(s)
Alignment with County Development Plan	Section 1.3.3 County Development Plan It is a specific provision of this Plan to ensure that all of the provisions from the Roscommon County Development Plan 2022-2028 identified in the SEA Environmental Report and AA Natura Impact Report that accompany this Plan shall be complied with throughout the implementation of this Plan.
Natural Heritage and Biodiversity	RN 51 Ensure the protection, conservation and enhancement of biodiversity within the settlement boundary of Roscommon town. RN 52 Highlight in the course of pre-planning discussions the need in all new development proposals to identify, protect and enhance ecological features by making provision for local biodiversity (e.g. through provision of swift boxes, bat roost sites, green roofs, etc.). RN 53 Encourage and enhance, where appropriate, the provision of biodiversity features in the town and ensure that appropriate measures to protect such features are integrated into development proposals. RN 54 Promote and encourage planting of native hedgerow species in new developments. RN 55 Ensure that hedgerows that are required to be removed in the interests of traffic safety or where breaches to hedgerows occur in compliance with relevant legislation, are replaced by the applicant/developer with suitable native species to the satisfaction of the Council.
Peatlands, wetlands and surface water courses and groundwater	RN 72 Protect water bodies and watercourses from inappropriate development, including rivers, streams, associated undeveloped riparian strips, wetlands and natural floodplains. This will include protection buffers in riverine and wetland areas as appropriate. Promote the sustainable management and uses of water bodies and avoid, where possible, culverting or realignment of these features.
Water services and water quality	8.3.4 Water Quality The European Water Framework Directive requires that all Member States implement the necessary measures to prevent deterioration of the status of all waters - surface and ground - and protect, enhance and restore all waters with the aim of achieving 'good' status. The Roscommon County Development Plan 2022-2028 contains various provisions that contribute towards meeting the objectives of the Directive. Proposals for development under this Local Area Plan shall not adversely affect the ability of any water body to meet its objectives under the Directive, individually or cumulatively in combination with other developments. RN 76 Require all new large scale developments to provide 'Sustainable Urban Drainage Systems' (SUDS) as part of their development proposals.
Invasive species	RN 56 Require, where the presence of invasive species is identified on any proposed development site, that robust treatment measures are detailed to demonstrate how these species will be appropriately managed and controlled.
Flood Risk Management	RN 71 Protect the flood zones identified in Map 2 of this Local Area Plan from inappropriate development and direct developments/land uses into the appropriate Flood Zone in accordance with the Planning System and Flood Risk Management – Guidelines for Planning Authorities (2009). RN 73 Require a site-specific Flood Risk Assessment (FRA) for all planning applications in areas at risk of flooding (including areas subject to the mid-range future scenario floods extents and Drainage Districts Benefited Lands, as published by the Office of Public Works), including developments that may be appropriate to the particular Flood Zone. Where required, flood risk assessments shall specify, in exceptional circumstances and where the criteria of the Justification Test have been met, the design of structural or non-structural flood risk management measures as prerequisites to development in these areas.

¹ Except as provided for in Article 6(4) of the Habitats Directive, viz. There must be: (a) no alternative solution available, (b) imperative reasons of overriding public interest for the plan to proceed; and (c) adequate compensatory measures in place.

² Note that non-material changes to individual Plan provisions referenced in this report may be updated during the finalisation of the Plan, including numbering, formatting and graphic design.

³ The measures generally benefit multiple environmental Sources and/or pathways for potential adverse effects i.e., a measure providing for the protection of water could beneficially impact upon the protection of biodiversity, flora and fauna, for example. All of the measures included in this table would benefit the protection of European sites.

Sources and/or pathways for adverse effects ³	Respective Local Area Plan Development Objectives / Mitigation Measure(s)
	<p>ensuring that flood hazard and risk to other locations will not be increased or, if practicable, will be reduced. These measures may relate to floor levels, internal layout, flood-resistant construction, flood-resilient construction, emergency response planning and access and egress during flood events (for more detail refer to Appendix 3 of the Roscommon County Development Plan 2022-2028).</p> <p>RN 75 Ensure that site-specific Flood Risk Assessments consider and provide information on the implications of flooding and climate change with regard to flood risk in relevant locations, having regard to relevant documents including the Planning System and Flood Risk Management – Guidelines for Planning Authorities (2009) and the associated Department of the Environment, Community and Local Government Circular PL2/2014, and the OPW Flood Risk Management, Climate Change Sectoral Adaptation Plan (2019) and/or any updated or superseding legislation or policy guidance.</p>
Light, air & noise pollution	<p>Provisions within the County Development Plan for the curtailment of light, air and noise pollution, under which the LAP is obligated to adhere, will ensure no adverse effects from these sources to European sites. Section 1.3.3 County Development Plan: It is a specific provision of this Plan to ensure that all of the provisions from the Roscommon County Development Plan 2022-2028 identified in the SEA Environmental Report and AA Natura Impact Report that accompany this Plan shall be complied with throughout the implementation of this Plan.</p>
Climate	<p>RN 57 Support a transition towards a low carbon, climate resilient community by facilitating opportunities to introduce energy efficiency and green infrastructure in a consolidated, universally accessible and pedestrian friendly urban environment.</p> <p>RN 58 Support the ongoing preservation, maintenance and enhancement of green areas and green infrastructure within Roscommon Town’s built environment, to reduce carbon dioxide and mitigate against the risk of flooding.</p> <p>RN 59 Promote the integration of energy efficient systems in all new development proposals, as well as the retrofitting of existing developments, in order to increase energy efficiency throughout the built environment in accordance with proper planning and sustainable development.</p> <p>RN 60 Seek to deliver a net gain in green infrastructure within Roscommon town through:</p> <ul style="list-style-type: none"> i) Protection and enhancement of existing assets; ii) Where applicable ensuring the provision of new green infrastructure as an integral part of the planning process; iii) Supporting public realm enhancements which introduce new green areas/landscaping as part of the scheme. <p>RN 61 Ensure development proposals do not unduly impact upon or prejudice existing green areas and/or biodiversity within the settlement boundary.</p> <p>RN 62 Ensure existing green infrastructure and any new green networks promote increased opportunities for dedicated pedestrian access and cycleways to encourage a healthier community.</p> <p>RN 63 Protect both existing natural and developed green infrastructure from inappropriate development which could negatively impact upon the quality of these areas.</p> <p>RN 64 Maintain greenbelt lands as a visual and environmental buffer to preserve the natural amenity of the area and to maintain the agricultural character of lands being identified as being utilised specifically for agricultural purposes.</p> <p>RN 65 Protect greenbelt lands from inappropriate developments which would give rise to an adverse impact upon the receiving environment and/or undermine the biodiversity/landscape or amenity value of the area.</p> <p>RN 66 Support the policy measures and actions set out in the County Roscommon Climate Action Plan to promote the integration of energy efficient building systems, renewable technologies and EV charging points, throughout the built environment of Roscommon town, in order to contribute towards a more carbon neutral and environmentally sustainable urban setting.</p> <p>RN 67 Support green initiatives arising from Roscommon town’s status as a designated Decarbonising Zone and any associated implementation plans promoting measures to reduce Greenhouse Gas (GHG) emissions and improve the natural and built environment of the town.</p> <p>RN 68 Promote and encourage positive community and/or co-operative led climate action initiatives and projects in Roscommon town that seek to reduce carbon emissions, improve energy efficiency, enhance green infrastructure and encourage awareness on climate change issues.</p> <p>RN 69 Promote the electrification of heating solutions to both new and existing homes, which use clean electricity thereby reducing dependency on fossil fuels and supports a move towards reducing carbon levels within the built environment of Roscommon town.</p> <p>RN 70 Engage with all stakeholders seeking to develop the potential of district heating schemes, including district heating derived from waste heat where technically feasible, cost effective and in accordance with all relevant planning considerations.</p>
Waste Management	<p>RN 24 Facilitate industrial activity on appropriately zoned lands, as well manufacturing and service provision, warehousing/storage facilities and ancillary developments such as training, financial, recycling and waste disposal. Where practical, the re-use of existing vacant units will be promoted prior to the further development of new build units.</p>

Table 2.2 Measures from the existing Roscommon County Development Plan 2022-2028 referred to in Section 1.3.3 of the Local Area Plan

Policy Objectives / Mitigation Measure(s), including
<p>CS 2.2 - Implement all land use planning policy and objectives consistent with the Core Strategy, in order to accelerate a transition to a greener, low carbon and climate resilient county, with a focus on reduced travel demand through the promotion of sustainable settlement patterns.</p> <p>ITC 7.29 - Support Irish Water in the implementation of their capital investment programme to ensure the timely delivery of water and wastewater infrastructure for the county.</p> <p>ITC 7.31 - Protect both ground and surface water resources including taking account of the impacts of climate change, support the implementation of the Rural Water Programme and to support Irish Water in the development and implementation of Drinking Water Safety Plans and the National Water Resources Plan.</p> <p>ITC 7.33 - Work with all stakeholders to promote water conservation and sustainable water usage.</p> <p>ITC 7.32 - Ensure the efficient and sustainable use and development of water resources and water services infrastructure, in order to manage and conserve water resources in a manner that supports a healthy society, economic development requirements and a cleaner environment.</p> <p>ITC 7.35 - Ensure that all new developments connect to the public wastewater infrastructure, where available, and to encourage existing developments that are in close proximity to a public sewer to connect to that sewer. These will be subject to a connection agreement with Irish Water.</p> <p>ITC 7.36 - Support Irish Water in the promotion of effective management of trade discharges to sewers in order to maximise the capacity of existing sewer networks and minimise detrimental impacts on sewage treatment works.</p>

Policy Objectives / Mitigation Measure(s), including

ITC 7.37 - Ensure that the adequate storm water infrastructure is provided in order to accommodate planned levels of growth in the county and to ensure that appropriate flood management measures are implemented to protect property and infrastructure.

TC 7.41 - Ensure that private wastewater treatment plants, where permitted, are operated in compliance with EPA's Code of Practice Wastewater Treatment and Disposal Systems Serving Single Houses (PE. ≤10) (2009), as may be amended.

ITC 7.42 - Support the improvement of storm water infrastructure to improve sustainable drainage and reduce the risk of flooding in urban environments.

ITC 7.43 - Ensure new development is adequately serviced with surface water drainage infrastructure which meets the requirements of the Water Framework Directive, associated River Basin Management Plans and CFRAM Management Plans. Furthermore, the Council will undertake its obligations under the European Union (Good Agricultural Practice for Protection of Waters) Regulations 2017.

ITC 7.44 - Ensure that developments in urban areas, both within developments and within the public realm, seek to minimise and limit the extent of hard surfacing and paving and require the use of sustainable drainage techniques for new development or for extensions to existing developments, in order to reduce the potential impact of existing and predicted flooding Risks.

ITC 7.45 - Require the provision of separate foul and surface water drainage systems.

ITC 7.46 - Have regard to the EU Flood Risk Directive, the Flood Risk Regulations (S.I. No. 122 of 2010) and the Guidelines for Planning Authorities on the Planning System and Flood Risk Management and Circular PL2/2014, through the use of the sequential approach and application of the Justification Tests in Development Management.

ITC 7.47 - Ensure that a flood risk assessment is carried out for development proposals impacting on flood risk areas, in accordance with the Guidelines for Planning Authorities on the Planning System and Flood Risk Management. This assessment shall be appropriate to the scale and nature of risk to the potential development.

ITC 7.48 - Protect and enhance the county's turloughs, lake/river floodplains and wetlands as strategically important green infrastructure which provides space for storage and conveyance of floodwater and enables flood risk to be more effectively managed, subject to normal planning and environmental criteria.

ITC 7.49 - Ensure that where flood risk management works take place that the natural and cultural heritage, rivers, streams and watercourses are protected and enhanced.

ITC 7.50 - Support the implementation of recommendations in the CFRAM Programme to ensure that flood risk management policies and infrastructure are progressively implemented.

ITC 7.51 - Ensure each flood risk management activity is examined to determine actions required to embed and provide for effective climate change adaptation as set out in the OPW Climate Change Sectoral Adaptation Plan for Flood Risk Management applicable at the time.

ITC 7.52 - Support the implementation of the Connacht Ulster Region Waste Management Plan 2015- 2021 and any subsequent updates.

ITC 7.53 - Encourage and support waste prevention, minimisation, reuse, recycling and recovery as methods of managing waste.

ITC 7.54 - Facilitate the transition from a waste management economy to a green circular economy to increase the value recovery and recirculation of resources.

ITC 7.55 - Promote the principles of the circular economy in minimising waste going to landfill and maximise waste as a resource, with prevention, preparation for reuse, recycling and recovery prioritised in that order, over the disposal of waste.

ITC 7.56 - Promote and support the provision of separate collection of waste in accordance with the requirements of the Waste Management (Food Waste) Regulations 2009, the Waste Framework Directive Regulations 2011 and other relevant legislation.

CAEE 8.1 - Support European and national objectives for climate action, adaptation and mitigation which address land use planning, energy, sustainable mobility, flood risk management and drainage as detailed in the Climate Action Plan, the National Climate Change Adaptation Framework (2018) and The Planning System and Flood Risk Management Guidelines (2009) and any subsequent versions of any of the aforementioned.

CAEE 8.2 - Support the National Climate Change Strategy by actively seeking to implement the policy objectives throughout this Plan which contribute to positive climate actions, including those related to renewable energy, sustainable transport, air quality, flooding and the promotion of urban and rural green initiatives.

CAEE 8.3 - Support developments and actions that assist in achieving the national targets for energy from renewable energy, from renewable resources and reducing greenhouse gas emissions associated with energy production.

CAEE 8.4 - Encourage and facilitate the various forms of renewable energy development detailed in the Renewable Energy Strategy that accompanies this Plan (as well as any other new forms of renewable energy which may be developed during the lifetime of this Plan), subject to satisfying the principles of proper planning and sustainable development.

CAEE 8.5 - Facilitate wind energy developments primarily in areas designated in the Renewable Energy Strategy as "Most Favoured" and secondarily in areas designated as "Less Favoured" in the Renewable Energy Strategy, subject to normal planning criteria and having regard to the Wind Energy Guidelines (DECLG, 2006) and any update to the Guidelines that may issue during the lifetime of this Plan. This will include consideration of carbon benefit analysis, as appropriate.

CAEE 8.6 - Facilitate proposals for energy storage systems and infrastructure, which support energy efficiency and reusable energy systems, provided such proposals accord with the principles of proper planning and sustainable development of the area.

CAEE 8.7 - Ensure that proposals for renewable energy developments are considered in the context of relevant EU and national legislation, including in respect of environmental protection. No renewable energy developments will be considered in designated Natura 2000 sites or their surrounding buffer areas.

CAEE 8.8 - Ensure that renewable energy developments do not undermine the preservation and conservation of the natural and built environment and that an appropriate balance is achieved between renewable energy development and preservation of the natural environment.

CAEE 8.9 - Work in collaboration with EirGrid and other service providers and statutory bodies to facilitate a modern electricity network within the county, including the 'North Connacht Project', in line with recognised best practice. The Council will require comprehensive studies to be undertaken for all technical and environmental considerations, to inform the assessment of proposed transmission routes.

CAEE 8.10 - Support the development of facilities within the county dedicated to the exploration and advancement of renewable energy technologies, recognising that such facilities could assist in expanding public awareness of the sustainable benefits of renewable energy, provide training, research and development facilities for renewable energy.

CAEE 8.11 - Encourage and facilitate research and development proposals for renewable energies in accordance with the principles of proper planning and sustainable development.

CAEE 8.12 - Facilitate renewable energy proposals that bring about a direct socio-economic benefit to the local community.

CAEE 8.13 - Promote the continued growth of the Sustainable Energy Community network by collaborating with SEAI and local communities to increase the number of Sustainable Energy Communities (SEC's) in County Roscommon to at least 50 by 2030.

CAEE 8.14 - Promote the integration of energy efficient systems in all new development proposals, as well as the retrofitting of existing development, in order to increase energy efficiency throughout the built environment in accordance with proper planning and sustainable development.

CAEE 8.15 - Engage proactively with developers for proposals within the built environment, which could provide opportunities to integrate with existing green infrastructure networks and contribute to the protection and enhancement of green assets.

CAEE 8.16 - Support the ongoing preservation, maintenance and enhancement of green areas and green infrastructure within the built environment, to reduce carbon dioxide and mitigate against the risk of flooding.

CAEE 8.17 - Support and facilitate initiatives that will improve sustainable modes of transport within the county, including public transport, electric and hybrid vehicles, improved pedestrian and cycling facilities, as appropriate.

CAEE 8.18 - Ensure that land use and transportation infrastructure are integrated as part of settlement strategies in order to develop more sustainable and compact settlements which are well served by public transport.

CAEE 8.19 - Encourage the provision of EV charging points in development proposals that are considered to provide a level of car communal parking spaces which could reasonably accommodate space(s) for EV charging.

Policy Objectives / Mitigation Measure(s), including

CAEE 8.20 - Support agri-sector enterprises that demonstrate they promote positive climate change through, for example reduced levels of greenhouse gas emissions and/or protection or enhancement natural, semi-natural or managed eco-systems.

CAEE 8.21 - Engage with all stakeholders within the farming community who seek to transition from traditional farming enterprises, into more sustainable agricultural initiatives, identified as being more environmentally sustainable.

CAEE 8.22 - Work with all stakeholders to increase awareness of nature-based solutions, which can help to develop more sustainable and climate resilient urban and rural communities.

CAEE 8.23 - Encourage the integration of nature based solutions into public and private development initiatives, such as amenity areas, ecological corridors and attenuation ponds, which can support carbon absorption and provide flood mitigation.

CAEE 8.24 - Ensure land use plans provide the appropriate framework to deliver consolidated development within the established settlements throughout County Roscommon, in order to support the delivery of lower carbon, more walkable urban centres.

CAEE 8.25 - Protect and enhance the biodiversity and ecological value of wetlands and other landscape features such as semi-natural grasslands, rivers, streams and turloughs which support the ecological network throughout County Roscommon.

CAEE 8.26 - Support the preservation and restoration of peatlands in County Roscommon, where appropriate, in order to transition towards a low-carbon county.

CAEE 8.27 - Ensure that peatland areas, including those designated or proposed for designation (including NHA, pNHA or Natura 2000 sites), are protected so as to allow their continued role as carbon sinks, which contribute towards reducing CO2 emissions.

CAEE 8.28 - Facilitate forestry related proposals which can support reduction in CO2 emissions, where it can be demonstrated they will not have significant adverse the Natura 2000 network and accord with the principles of proper planning and sustainable development.

RD 5.3 - Support and encourage farm-based renewable energy technologies as a means of improving the shift toward a low-carbon and climate resilient economy in the agriculture, food and forestry sectors.

RD 5.6 - Support forestry development of appropriate scale and character where it does not have a negative impact on the countryside, (including public access/rights of way, traditional walking routes and recreational facilities), or cause pollution or degradation of wildlife habitats, natural waters or areas of ecological importance.

RD 5.8 - Encourage the planting of diverse and native species to ensure rich and varied biodiversity value, particularly in areas where there is evidence of a dominant species planted cumulatively within the landscape.

NH 10.1 - Ensure the protection, conservation and enhancement of the biodiversity of the county.

NH 10.2 - Support the implementation of the relevant recommendations contained in the National Biodiversity Action Plan, including no net loss in biodiversity, and the All-Ireland Pollinator Plan.

NH 10.3 - Implement the County Roscommon Heritage Plan and the Biodiversity Action Plan, or any subsequent plans, in partnership with all relevant stakeholders.

NH 10.4 - Proposals where woodland, tree or hedgerow removal is proposed will be required to demonstrate a sufficient level of protection to Annex IV species, such as Bats and Otter, in accordance with the Habitats Directive.

NH 10.5 - Ecological Impact Assessment (EiA) will be required for proposed developments likely to significantly impact on natural habitats and/or species, and which are not subject to Environmental Impact Assessment

NH 10.6 - Require all new developments in the early pre-planning stage of the planning process to identify, protect and enhance ecological features by making provision for local biodiversity (e.g. through provision of swift boxes, bat roost sites, green roofs, etc.) having regard to the recommendations outlined in the Habitat Mapping in Co. Roscommon, 2011 and the County Roscommon Swift Survey, 2020

NH 10.7 - Implement Article 6(3) and where necessary Article 6(4) of the Habitats Directive and to ensure that Appropriate Assessment is carried out in relation to works, plans and projects likely to impact on European sites (SACs and SPAs), whether directly or indirectly or in combination with any other plan(s) or project(s). All assessments must be in compliance with the European Communities (Birds and Natural Habitats) Regulations 2011.

NH 10.8 - Ensure that no plans, programmes, etc. or projects are permitted that give rise to significant cumulative, direct, indirect or secondary impacts on the integrity of European Sites arising from their size or scale, land take, proximity, resource requirements, emissions (disposal to land, water or air), transportation requirements, duration of construction, operation, decommissioning or from any other effects, (either individually or in combination with other plans, programmes, etc. or projects).

NH 10.9 - Ensure that any plan or project that could have a significant adverse impact (either alone or in combination with other plans and projects) upon the conservation objectives of any Natura 2000 Site or would result in the deterioration of any habitat or any species reliant on that habitat will not be permitted less in exceptional circumstances.

NH 10.10 - Actively promote the conservation and protection of areas designated as an NHA (including proposed sites) and to only consider proposals for development within or affecting an NHA where it can be clearly demonstrated that the proposed development will not have a significant adverse effect on the NHA or pNHA.

NH 10.11 - Preserve and protect sites of county geological importance from inappropriate development where they comprise designated sites or national heritage areas.

NH 10.12 - Promote and facilitate the development of geo-tourism in County Roscommon where it does not have a detrimental impact on designated sites or features of geological interest.

NH 10.13 - Encourage the retention of hedgerows and other distinctive boundary treatments in rural areas and prevent loss and fragmentation, where practically possible. Where removal of a hedgerow, stone wall or other distinctive boundary treatment is unavoidable, mitigation by provision of the same type of boundary will be required.

NH 10.14 - Promote and encourage planting of native hedgerow species in new developments.

NH 10.15 - Ensure that hedgerows that are required to be removed in the interests of traffic safety or where breaches to hedgerows occur in compliance with relevant legislation, are replaced by the applicant/developer with suitable native species to the satisfaction of the Council.

NH 10.16 - Protect and enhance the valuable peatland resource in County Roscommon whilst protecting the heritage and environmental value of these peatland areas. The aims of the National Peatlands Strategy and the implementation of the National Raised Bog Special Areas of Conservation Management Plan 2017-2022 and the Enhanced Decommissioning Rehabilitation and Restoration Scheme will be supported.

NH 10.17 - Work with relevant agencies such as the Bord na Mona, NPWS, Coillte and adjacent local authorities to prepare an after-use framework plan for the peatlands and related infrastructure, to provide for the future sustainable and environmentally sensitive use of large industrial peatlands sites when peat harvesting finishes.

NH 10.18 - To manage, enhance and protect the wetlands of the county having regard to the County Roscommon Wetland Survey (2017) and ensure that there is an appropriate level of assessment in relation to proposals which would involve draining, reclaiming or infilling of wetland habitats.

NH 10.19 - Ensure that the county's watercourses are retained for their biodiversity and flood protection values and to conserve and enhance where possible, the wildlife habitats of the County's rivers and riparian zones, lakes, canals and streams which occur outside of designated areas to provide a network of habitats and biodiversity corridors throughout the county. The Council shall be available to engage with the NPWS with the objective of facilitating the monitoring and surveying of wetland sites in Roscommon.

NH 10.20 - Protect waterbodies and watercourses from inappropriate development, including rivers, streams, associated undeveloped riparian strips, wetlands and natural floodplains. To this effect, consideration should be given to Inland Fisheries Ireland's guidance document Planning for Watercourses in the Urban Environment (2020).

NH10.21 Support the sustainable development of the fisheries and aquaculture industry in co-operation with the Department of Agriculture, Food and the Marine and the Inland Fisheries Ireland.

NH 10.22 Encourage and enhance, where appropriate, the provision of biodiversity features in urban areas through the preparation of local area plans/settlement plans, green infrastructure strategies and through the development management process.

Policy Objectives / Mitigation Measure(s), including

NH 10.23 - Require all development proposals to address the presence or absence of invasive alien species on proposed development sites and (if necessary) require applicants to prepare and submit an Invasive Species Management Plan where such a species exists to comply with the provisions of the European Union (Birds and Natural Habitats) Regulations 2011 to 2015.

NH 10.24 - Ensure, where the presence of invasive species is identified on any proposed development site, that robust treatment measures are detailed to demonstrate how these species will be appropriately managed and controlled.

NH 10.21 - Encourage and enhance, where appropriate, the provision of biodiversity features in urban areas through the preparation of local area plans/settlement plans, green infrastructure strategies and through the development management process.

NH 10.28 - Create an integrated and coherent green infrastructure network to enhance biodiversity and quality of life, provide sustainable water management and a green setting for urban areas.

NH 10.29 - Facilitate the on-going development and improvement of green infrastructure in the Plan area, including green networks, green amenities and linked green corridors which ensure the provision of recreational amenities, natural areas for the growth of wildlife and biodiversity, and a network of infrastructure which results in a better quality of life for visitors and inhabitants alike.

NH 10.30 - Prepare and implement a Green Infrastructure Strategy for the county in partnership with key stakeholders and the public.

ED 6.15 - Facilitate the extraction of minerals and aggregates and associated processing where such activities do not have a significant negative impact on the environment, landscape, public health, archaeology or residential amenities of neighbouring settlements and where such operations are in compliance with all national regulations and guidelines applicable to quarrying and mining activities.

ED 6.16 - Ensure that the development of aggregate resources (stone and sand/gravel deposits) is carried out in a manner which minimises effects on the environment, including the Natura 2000 network and its sustaining habitats (including water dependent habitats and species), amenities, infrastructure and the community, and can demonstrate environmental enhancement through habitat management plans/ecological restoration.

ED 6.18 - Require appropriate restoration of quarried lands and encourage the reuse of worked out quarries for ecological benefit and / or for recreational educational and agricultural purposes.

Section 10.7 (10.7 Woodlands, Trees and Hedgerows):
The Habitats Directive provides a level of protection to Annex IV species, such as Bats and Otter. Proposed developments, including all proposals where woodland, tree or hedgerow removal is proposed, should be consistent with this.

Section 10.8 (Peatlands):
Developments sited on peatlands have the potential to increase overall carbon losses, potentially undermining expected carbon savings (in the case of renewable energy developments) and damaging rare habitats of European importance. It is recommended that when developing project proposals for developments on peatlands, assessments are undertaken that consider peatland stability, carbon emissions balance and hydrology and ecology.

Section 10.10 (Inland Waterways):
The Council shall be available to engage with the NPWS with the objective of facilitating the monitoring and surveying of wetland sites in Roscommon.†

Footnote: † Consideration should be given to Inland Fisheries Ireland's guidance document "Planning for watercourses in the urban environment" (2020).

Chapter 12 'Pre-planning':
Proposals for development should demonstrate compliance with the various written provisions of the Plan, as relevant, including those relating to environmental protection and management. Environmental considerations, such as those related to elevated levels of flood risk or ecological designations may limit the types of uses that may be possible at certain sites. Prospective applicants are encouraged to engage with the Planning Authority at the earliest opportunity to seek guidance as to the appropriateness of emerging proposals.

Section 12.5 (Overarching Planning Principles):
Lighting fixtures should be designed so as to avoid creating glare and should have minimum environmental impact.

Section 12.5 (Overarching Planning Principles) in Chapter 12 of Volume I:
Proposals for development will be assessed in terms of potential impact on existing adjacent developments, existing land uses and/or the surrounding landscape. Where proposed developments would be likely to have a significant adverse effect on the amenities of the area through pollution by noise, fumes, odours, dust, grit or vibration, or cause pollution of air, water and/or soil, mitigation measures should be included in order to eliminate adverse environmental impacts or reduce them to an acceptable operating level. Proposals shall also ensure that investigations are carried out in relation to the nature and extent of any soil and groundwater contamination and the risks associated with site development work, where brownfield development is proposed. The EPA's publication Code of Practice: Environmental Risk Assessment for Unregulated Waste Disposal Sites (2007) shall be taken into account as relevant.

Section 12.18 (Tourism and Recreation Facilities):
Proposed developments should seek to manage any increase in visitor numbers and/or any change in visitor behaviour in order to avoid significant environmental effects, including loss of habitat and disturbance. Proposals should also ensure that new projects and activities are a suitable distance from ecological sensitivities. Visitor/habitat management plans may be required. Considerations should include potential impacts on existing infrastructure (including drinking water, wastewater, waste and transport) resulting from tourism proposals.

Section 3 Consideration of Alternatives

This section summarises the alternatives considered for the Plan during the preparation process. These alternatives have been incorporated into the Plan having regard to both:

1. The environmental effects (including those related to ecology and European sites) which are identified by the SEA (informed by the AA) and are summarised below; and
2. Planning - including social and economic - effects that also were considered by the Council.

3.1 Limitations in Available Alternatives

The Plan is required to be prepared by the existing, already in force, Roscommon County Development Plan 2022-2028 and the Planning and Development Act 2000 (as amended), which specifies various types of objectives that must be provided for by the Plan. The alternatives available for the Plan are significantly limited by the provisions of higher-level planning objectives, including those of the National Planning Framework, the Regional Spatial and Economic Strategy for the Western and Northern Region and the County Plan. These documents set out various requirements for the content of the Plan including on topics such as land use zoning and the sustainable development of settlements, including Roscommon Town.

3.2 Summary of Description and Assessment

The preparation of the Roscommon County Development Plan 2022-2028 and associated SEA process already considered various different types of alternatives, including those relating to population allocations, densities and approach to land use zoning. The selected alternatives for the County Development Plan set requirements for lower tier planning in the County and have been integrated into the Local Area Plan as appropriate. Two Development Strategy alternatives were identified and assessed for the Local Area Plan as summarised below.

Alternative Type 2 (i): "More Consolidated, More Compact"

Under this alternative Development Strategy, the Town would reach its population allocation under core strategy as contained in Chapter 2 "Chapter 2: Core Policy and Settlement Policy" of the Roscommon County Development Plan 2022-2028.

The approach under this alternative would allow for water supply, waste water, compact growth, public transport and co-ordinated development considerations to be integrated into the Plan to the highest degree.

The infrastructure required to be in place to achieve the growth targets is already in place or planned under this alternative.

The development of the town centre would be more compact and sustainable under this scenario and would better support the longer-term viability of the settlement. 30% of residential units would be expected to take place in the core areas of the town. Giving a strong preference to lands that have both greater capacity to satisfy the principles of active travel and a more realistic opportunity of being developed over the lifetime of the Plan and giving a focus would be given to Opportunity sites (with clear design and uses identified– making successful applications for the sustainable, compact development of the town more likely) would allow for the proper planning and sustainable development of the town as envisaged by the wider planning framework to the greatest degree.

This alternative Development Strategy would make the greatest contribution towards the protection and management of the environment by facilitating development of lands (including those within and adjacent to the Town's core areas) that have relatively low levels of environmental sensitivities and are served (or can be more easily served) by infrastructure and services, thereby helping to avoid the need to develop more sensitive, less well-served lands elsewhere in the Plan area and beyond. The Development Strategy under this Alternative would be considered the most effective out of both

Development Strategies considered in the delivery of a sustainable, low carbon and climate resilient future for the town.

The approach under Alternative (i) 'More Consolidated, More Compact Development' would benefit the protection of various environmental components. Although potentially adverse effects associated with land use development would exist, they would be mitigated to a significant degree. Less residual environmental effects would result.

Alternative Type 2 (ii): "Less Consolidated, Less Compact"

Under this alternative Development Strategy, the Town would reach its population allocation under core strategy as contained in Chapter 2 "Chapter 2: Core Policy and Settlement Policy" of the Roscommon County Development Plan 2022-2028.

The approach under this alternative would not allow for water supply, waste water, compact growth, public transport and co-ordinated development considerations to be integrated into the Plan to the highest degree.

Additional infrastructure would be required to accommodate sporadic development, more than would be required for Alternative (i) 'More Consolidated, More Compact Development' and some development may have to be serviced by private waste water treatment systems which would have to be properly maintained.

The development of the Town Centre would be less compact and less sustainable under this scenario and would not optimally support the longer-term viability of the settlement. 30% of residential development would be less likely to be achieved in core areas in comparison with Alternative (i) 'More Consolidated, More Compact Development'. Giving less of a preference to lands that have both greater capacity to satisfy the principles of active travel and a more realistic opportunity of being developed over the lifetime of the Plan and giving a less focus would to Opportunity sites (there would be no clear guidance on the design parameters or uses identified – making successful applications for the sustainable, compact development of the town less likely) would allow for the proper planning and sustainable development of the town as envisaged by the wider planning framework to a lesser degree.

This alternative Development Strategy would make less of a contribution towards the protection and management of the environment by facilitating development of lands (including those within and adjacent to the Town's core areas) that have relatively low levels of environmental sensitivities and are served (or can be more easily served) by infrastructure and services. Demand to develop more sensitive, less well-served lands elsewhere in the Plan area would be provided for. The Development Strategy under this Alternative would be considered the least effective out of both Development Strategies considered in the delivery of a sustainable, low carbon and climate resilient future for the town.

The approach under Alternative (ii) 'Less Consolidated, Less Compact' would benefit the protection of various environmental components to a lesser degree. Although potentially adverse effects associated with land use development would exist, they would be mitigated to in many cases; however, more residual environmental effects would result.

3.3 Reasons for Choosing the Selected Alternative in light of Other Reasonable Alternatives Considered

The Alternative Development Strategy selected for the Plan is Alternative (i) "More Consolidated, More Compact". This alternative was selected having regard to both:

1. The environmental effects which are identified by the SEA and are detailed above; and
2. Planning - including social and economic - effects that also were considered.

However, certain Material Alterations introduce elements of Type 2 (ii): "Less Consolidated, Less Compact".

Section 4 AA Determination



Comhairle Contae
Ros Comáin
Roscommon
County Council



Appropriate Assessment Determination

under
Section 177V of the Planning and Development Act 2000, as amended,
for the

Roscommon Town Local Area Plan 2024-2030

In order to comply with the requirements of Section 177V of the Planning and Development Act 2000, as amended, and pursuant to Article 6(3) of the Habitats Directive as to whether or not a plan or project would affect the integrity of any European site(s), this Appropriate Assessment determination is being made by Roscommon County Council relating to the potential for the Roscommon Town Local Area Plan 2024-2030 that is being adopted¹ to have effects on the integrity of European sites.

In carrying out this Appropriate Assessment (AA), the Council is taking into account the matters specified under Part XAB of the Planning and Development Act 2000 (as amended), including the following:

- The Natura Impact Report prepared for the Draft Plan;
- The Screening for AA Report prepared for the Proposed Material Alterations;
- Written submissions made during the Plan preparation process; and
- Ongoing advice on AA from the Council's agents.

A Consolidated Natura Impact Report has also been made available, integrating relevant elements of these matters into one document.

As part of the AA, it was identified that the Plan may, if unmitigated, have likely significant effects on 3 (no.) European sites. Plan elements that could present sources with pathways for likely significant effects to European sites are:

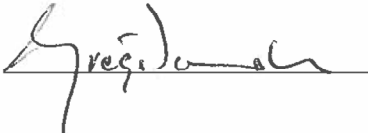
- The Plan's provisions, including those relating to land use zoning, strategies for planning and development, town centre and economic development, sustainable communities, transport and connectivity, local heritage, infrastructure, energy and utilities, which introduce sources for potential effects through construction phase such as habitat loss, light pollution, disturbance effects and hydrological interactions through surface hydrological connectivity and/or shared groundwater sources;
- Loading pressures from the operational phase of developments – these sources could result in habitat loss/fragmentation, light pollution, disturbance effects and interactions with water quality (surface and/or groundwater); and
- Increases in visitor numbers to ecologically sensitive areas during the operational phase of developments which have potential to introduce sources for significant effects, such as recreational and tourism developments.

The undersigned, having carefully considered the information referred to above agrees with and adopts the reasoning and conclusions presented and determines that:

- Implementation of the Plan to be adopted would have had the potential to result in adverse effects to the integrity of European sites, if unmitigated.
- The risks to the safeguarding and integrity of the Qualifying Interests, Special Conservation Interests and Conservation Objectives of the European sites have been addressed by the inclusion of mitigation measures into the Plan that will prioritise the avoidance of effects in the first place and mitigate against the identified potential adverse effects on the integrity of European sites where these cannot be avoided. In addition, all lower-level plans and projects arising through the implementation of the Plan will themselves be subject to AA/screening for AA when further details of design and location are known.

¹Incorporating: the Draft Plan; all and any alterations; and all and any further modifications considered by the AA process.

- In-combination effects from interactions with other plans and projects are considered and the mitigation measures incorporated into the Plan are seen to be robust to ensure that there will be no adverse effect on the integrity of any European site as a result of the implementation of the Plan, either alone or in-combination with other plans/projects.
- Having incorporated mitigation measures² into the Plan, it has been demonstrated that the Plan to be adopted is not foreseen to give rise to any adverse effect on the integrity of any designated European site, alone or in combination with other plans or projects³. This demonstration has been made in view of the Conservation Objectives of the habitats and/or species, for which these sites have been designated.

Signed: 

Name: Greg O'Donnell

Date: 25th July 2024

² As identified by the following reference numbers in the Consolidated Natura Impact Report:

Section 1.3.3 "County Development Plan", Section "8.3.4 Water Quality", RN 24, RN 39, RN 40, RN 41, RN 42, RN 43, RN 44, RN 45, RN 46, RN 47, RN 48, RN 49, RN 50, RN 51, RN 52, RN 53, RN 54, RN 55, RN 56, RN 57 and RN 58.

Note that non-material changes to individual Plan provisions referenced in this determination and described in the Consolidated Natura Impact Report may be updated during the finalisation of the Plan, including numbering, formatting and graphic design.

³ Except as provided for in Article 6(4) of the Habitats Directive, viz. There must be: a) no alternative solution available, b) imperative reasons of overriding public interest for the plan to proceed, and c) Adequate compensatory measures in place.