

28 July 2020

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

Re: Issues Paper for the Roscommon County Development Plan 2021 – 2027

A chara

Thank you for your authority's work in preparing the *Roscommon County Development Plan 2021-2027 Issues Paper*. The Office acknowledges and welcomes the publication of this paper and your authority's work more broadly in advancing the review of the Roscommon County Development Plan (the plan).

In accordance with the provisions of section 31AM of the Planning and Development Act 2000, as amended (the Act), the Office is obliged to evaluate and assess development plans in the context of certain statutory parameters including:

- Matters generally to be contained in a development plan (section 10) and, in particular, section 10(2)(n) in relation to climate change;
- Consistency with the *National Planning Framework (NPF)* and the *Northern and Western Regional Assembly Regional Spatial and Economic Strategy (RSES)*;
- Ministerial guidelines under section 28;
- Ministerial policy directives issued under section 29, and,
- Such other legislative and policy matters as the Minister may communicate to the Office in writing.

The Office has set out some comments for the planning authority to consider in formulating the draft development plan.

These comments are offered without prejudice to any statutory observations and recommendations as may be forthcoming from the Office at future stages of the plan making process, and do not affect the obligation on the planning authority to comply with the relevant legislative requirements.

Consultation strategies

The Office commends the planning authority for the innovative methods used to inform the public about the review of the plan and opportunities to make contributing to the preparation of the plan both simple and straightforward.

In particular, the Office welcomes the use of Twitter and a YouTube video explaining the purpose of the plan and how to make a contribution, and efforts to engage with schools and younger members of the community.

The Office would appreciate feedback on the effectiveness of the planning authority's consultation approach in due course.

Core Strategy & Settlement Strategy

The formulation of the Core Strategy in line with section 10 of the Act is the most significant element in developing the planning authority's draft development plan.

The NPF and the RSES for the Northern and Western Regional Assembly area, in addition to relevant specific planning policy requirements (SPPRs) specified in Ministerial guidelines under section 28 of the Act will be key determinants in making the Core Strategy for your functional area. In this regard, the Office welcomes the explanations provided for the Core Strategy and Settlement Strategy in the Issues Paper and the emphasis placed on the need for these strategies to have regard to national and regional policies.

The NPF signals the Government's intention to secure more sustainable and compact urban development patterns into the future and sets a target to deliver at least 30% of all new homes that are targeted in settlements other than the five Cities and their suburbs, within their existing built-up footprints¹. In this regard, the Office commends the planning authority for the emphasis placed on compact growth in the Issues Paper and endorses the statement on page 8:

*'It is essential that the forthcoming County Development Plan maintains the momentum in reversing the decline of towns and villages. As such the Plan is likely to have a strong focus on the regeneration and renewal of the county's town and villages, in order to improve their physical attractiveness and enhance their appeal as places to work, live and invest in.'*²

¹ National Policy Objective (NPO) 3c, page 159 of the NPF

² Page 8 of the Roscommon Issues Paper

As the planning authority will be aware, the NPF has a target population for County Roscommon of 70,500-71,500 by 2026 and 73,000-74,500 by 2031. This represents a population increase for the county of 6,000 to 7,500 people to 2026 above its 2016 census figure of 64,500.

The overall population target for the county in the Core Strategy is required to be consistent with the NPF Implementation Roadmap, with the projected growth of settlements also required to be consistent with the policy objectives of the NPF and the RSES concerning the distribution of population growth.

While County Roscommon together with counties Galway and Mayo form part of the Northern & Western Regional Assembly area, the NPF recognises that the northern and southern parts of the county are influenced by their proximity to the northwest and midland areas of the country respectively.

*'Much of Roscommon functionally operates as part of the Midland region, focused on Athlone, which is partly located within the County, whereas the northern part of the County is influenced by proximity to Sligo and Leitrim.'*³

The Office notes that the Issues Paper makes reference to the distinct north / south differences within the county with respect to population growth, service provision and economic activity, and the opportunity provided by tourism in the north. In this regard, the planning authority should ensure that the Core Strategy is sufficiently robust to respond to the challenges and opportunities within the northern and southern areas of the county.

The Office will provide further practical advice and technical support in the working out of the Core Strategy parameters above and within our statutory remit as you may require.

Regional Growth Centre

The Office notes that Athlone, including the Monksland / Bellanamullia area in County Roscommon, is one of the designated regional centres in the NPF.

National Policy Objective (NPO) 2b and NPO 7 recognise the key regional role of Athlone in the Midlands and it is acknowledged that the town fulfils a regional role to a greater extent than elsewhere due to its location⁴. Page 33 of the NPF outlines the extent of Athlone's influence and need for a co-ordinated strategy to support its growth.

'Due to strategic location and scale of population, employment and services, Athlone has an influence that extends to part of all three Regional Assembly areas. Given the importance of

³ Page 40 of the NPF

⁴ Pages 11 and 21 of the NPF

regional interdependencies, it will be necessary to prepare a co-ordinated strategy for Athlone at both regional and town level, to ensure that the town and environs has the capacity to grow sustainably and to secure investment, as the key regional centre in the Midlands.'

Having regard to the town's influence, the Office considers that the determination of boundary for the Urban Area Plan (UAP) should be cognisant of the relationship between the hinterland and urban area of Athlone.

Both the RSES for the Northern and Western, and Eastern and Midland Regional Assembly areas contain regional policy objectives regarding the preparation of a joint UAP for Athlone informed by joint strategies for transport, retail and economic development. In this regard, the Office would welcome a commitment to prioritising the preparation of a UAP for Athlone in the plan.

Acknowledging the emphasis placed on Roscommon and Westmeath County Councils working together to develop co-ordinated plans for Athlone and the timing for the preparation of the Westmeath County Development Plan 2021-2027, the Office would like to highlight the provisions of section 9(4) of the Act, which states:

'In making a development plan in accordance with this Chapter, a planning authority shall have regard to the development plans of adjoining planning authorities and shall co-ordinate the objectives in the development plan with the objectives in the plans of those authorities except where the planning authority considers it to be inappropriate or not feasible to do so.'

Having regard to the above, engagement and co-ordination with Westmeath County Council in the ongoing review of the Roscommon County Development Plan is essential and the Office would expect to see evidence of the above in the next stage of your development plan review process. The Office advises the planning authority to review the Office's submission to the Draft Westmeath County Development Plan in relation to its comments about Athlone in particular.

Urban Regeneration

The NPF recognises that the regeneration and rejuvenation of cities, towns and villages of all types and scale can play a role making stronger urban places and contributing to compact growth.

In this regard, the Office commends the planning authority for the emphasis it has placed on the regeneration of the county's towns and villages in recent years and endorses the anticipated focus on regeneration and renewal in the next development plan.

The RSES designates Roscommon Town as a Key Town in the region and describes it as *'...a vibrant urban area with strong retail and commercial base, displaying strengths in the service sector in*

*particular whilst also having an industrial sector which has the potential for significant further growth*⁵. Notwithstanding this, the Office notes that the RSES lists Roscommon Town amongst a group of prominent towns with commercial vacancy rates above 20% and considers that this will be a key issue for the forthcoming local area plan (LAP) for Roscommon Town.

The key future priorities listed in section 3.8.7 of the RSES recognise the regeneration opportunities that exist in Roscommon Town which would deliver residential development in a more compact urban form. Acknowledging that Key Towns including Roscommon Town are targeted to have a 30% population uplift in the RSES, the development plan will need to prioritise the development of opportunity sites close to the town centre in the first instance.⁶

The NPF also supports the use of performance based standards⁷ for infill and brownfield development stating

'In particular, general restrictions on building height or universal standards for car parking or garden size may not be applicable in all circumstances in urban areas and should be replaced by performance-based criteria appropriate to general location, e.g. city/town centre, public transport hub, inner suburban, public transport corridor, outer suburban, town, village etc.'

In this regard, there is an opportunity to review the current development management standards in Chapter 9 of the development plan in particular section 9.6 (Residential Development) and section 9.7 (Apartments) to ensure they are consistent with the relevant and any updated section 28 guidelines.

Local Area Plans

The Office notes that some of the existing LAPs listed under 'Planning Publications' on the planning authority's website will have either expired or be close to expiring by the time the next development plan is adopted.

The Office advises the planning authority to transfer as much content as possible including land use zonings to the new development plan especially where a LAP has expired or is close to expiring. This is preferable to an expired LAP remaining in force with outdated or superseded contents pending review or the preparation of a new LAP.

The Office also advises the planning authority to limit the number of development plan objectives requiring the preparation of a LAP especially for the smaller towns / villages or where limited growth

⁵ Page 104 of the RSES for the Northern and Western Region

⁶ Table 3.4 and RPO 3.1 in the RSES

⁷ Page 67 of the NPF

is anticipated having regard to section 19(1)(bb) of the Act. The Office can provide further advice to the planning authority on these matters if required.

The Office notes that one of the key future priorities for Carrick-on-Shannon in the RSES is to

‘Prepare a joint Local Area Plan with Roscommon to deliver an integrated framework for the future development of the urban area within 3 years of the adoption of this strategy.’

The Office advises that it may appropriate to make reference to this key future priority in the development plan.

Economic Development & Employment

The Office notes that the local economy is *‘...characterised by a high dependence on traditional manufacturing and retail sectors, dominated by micro-enterprises, as well as relatively high employment in the public sector’* and there are differences between the northern and southern areas of the county⁸.

The Office notes that one of the key future priorities in the RSES for Roscommon Town is

‘Identify opportunities to benefit from investment in recent times in modern incubation and innovation infrastructure for ICT and related companies. This will build upon the success of a desk-incubation facility established in the town to facilitate entrepreneurial activity...’

The Office also notes that the towns at tiers 1 and 2 of the county settlement hierarchy have a high ratio of jobs to resident workers above the average ratio of 1.13 for the whole northern and western region. Page 176 of the NPF states

‘The extent to which the ratio is greater or less than 1.0, is also generally indicative of the extent to which a town has a wider area service and employment role, rather than as a commuter settlement.’

The Office considers that the current high jobs ratios in many of the county’s key settlements place the county in a strong position to strengthen and sustainably grow its larger settlements, and reduce pressure for one off housing in the rural hinterlands.

The Office notes that Roscommon and Westmeath County Councils have completed a joint retail strategy for Athlone which designates the retail area in Monksland / Bellanamullia as a Tier 2: Special Category Settlement and contains the following policy:

⁸ Page 12 of the Issues Paper

'It is the policy of the Councils to sustain and enhance the retail, services and community offer of Monksland / Bellanamullia as a more fully integrated part of Athlone and its environs, ensuring local needs are better met but without potentially having an adverse impact on the vitality and viability of the centre of Athlone.'

The Office supports the above policy and advises that this should be clearly reflected in the policies and land use zonings in the joint UAP for Athlone.

The Office considers that the plan should be proactive in identifying sites or opportunities to support economic development and employment consistent with national, regional and local policies, and in particular the principles in the section 28 guidelines on retail planning⁹ and national roads¹⁰.

Transport & Infrastructure

The Issues Paper recognises the fundamental link between transport and land use planning, and the significant impact the transport network can have on the daily movement of people into and around the county. The Office welcomes the recognition in the Issues Paper on the need to plan for initiatives which encourage a change in the current car dependency at county level.

In view of the greenhouse gas (GHG) emissions from transport (which are second only to agricultural emissions in terms of national emissions¹¹) and the energy use for transport (highest energy use by sector, accounting for 43% total final consumption in 2017), it will be essential for the planning authority to achieve a significant modal shift in the county in order to meet the requirements under section 10(2)(n) of the Act. In view of same, the Office would encourage the planning authority to include modal shift targets to be achieved over the plan period, aligned to relevant implementation measures, in order to achieve meaningful improvements in GHG emissions and energy use in line with section 10(2)(n).

The NPF sets out a two-tier approach to land zoning referred to as the tiered approach to land zoning. In this regard, the planning authority's attention is drawn to the requirement in NPO 72a which states

'Planning authorities will be required to apply a standardised, tiered approach to differentiate between i) zoned land that is serviced and ii) zoned land that is serviceable within the life of the plan.'

⁹ Guidelines for Planning Authorities Retail Planning (Apr 2012)

¹⁰ Spatial Planning and National Roads Guidelines (Jan 2012)

¹¹ EPA: www.epa.ie/ghg/currentsituation/

Further information regarding the above is provided in Appendix 3 - A Methodology for a Tiered Approach to Land Zoning of the NPF. In respect of the provision of wastewater and water infrastructure, there is a need to work proactively with Irish Water to progress projects that deliver infrastructure for the county's settlements and support development in strategic development areas consistent with the NPF and RSES.

The Office notes that the RSES makes reference to a number of key infrastructural projects affecting the county including, inter alia:

- Extension of the gas supply network to the county¹²
- Roscommon Town Main Drainage Scheme¹³
- N5 Ballaghaderreen to Scramogue¹⁴
- N61 Athlone to Boyle improvement¹⁵

A key issue for the next development plan is to ensure that policies maximise the benefits of existing and planned public transport investment and that planned improvements to the national road network are not eroded by a growth in demand for car travel, especially for short distances, in the absence of long term public transport infrastructure.

The Office notes the emphasis contained in the RSES on preparing enabling plans or local transport plans to support national policy objectives regarding compact growth and sustainable mobility. The Office advises of the need for the plan to demonstrate a high level of consistency with the RPOs in section 3.7.1 of the RSES which in turn may assist the planning authority in meeting the mandatory objective in section 10(2)(n) in relation to climate change.

Commitment to the proactive implementation of the Design Manual for Urban Roads and Streets (as revised) in the required locations, consistent with RPO 6.26, will also assist sustainable and active transport modes, in addition to improvement in the street environment and overall quality of life of urban areas and settlements of all sizes.

Rural Development

The Office acknowledges that the county is predominantly rural and that there are distinct north / south differences in population performance which is '*... in part linked to employment and economic growth patterns and proximity to larger urban centres*'¹⁶.

¹² RPO 8.5 in the RSES

¹³ Page 223 of the RSES

¹⁴ Page 177 of the RSES

¹⁵ Page 177 of the RSES

¹⁶ Page 6 of the Roscommon Issues Paper

The Office notes that population levels in many rural areas stagnated or declined between 2011 and 2016, while other areas like the Athlone No. 2 rural area experienced population growth of 3.5% over the same period.

Recognising ‘...that there remains an on-going demand for one-off housing in rural areas’¹⁷, it is important that the next development plan provides the appropriate balance between policies supporting rural housing and those that proactively address issues of town / village decline and compact growth. In this regard, the plan’s policies will need to demonstrate consistency with NPOs 19 and 20¹⁸.

Furthermore, the plan will need to consider the practical implementation of appropriate policy objectives through suitable land activation approaches and proactive facilitation of the building of homes within the footprint of rural settlements through measures such as site acquisition and serviced sites consistent with NPO 18a and NPO 18b. Such initiatives have the potential to alleviate pressure on the open countryside through provision of a desirable alternative to one-off housing for families who would like to reside close to the facilities, services and amenities available in rural villages and towns whilst maintaining ties to the wider rural community.

The Office understands that updated guidance on rural housing is in development by the Department of Housing, Planning and Local Government and in the interim, the planning authority’s attention is drawn to NPO 19 of the NPF and Circular letter PL 2/2017 from the Department of Housing, Planning, Community and Local Government regarding *Sustainable Rural Housing Guidelines for Planning Authorities* 2005 and Local Needs Criteria in Development Plans.

Strategic Flood Risk Assessment

The planning authority will be aware of the need to prepare a Strategic Flood Risk Assessment (SFRA) as part of the forthcoming draft development plan, consistent with *The Planning System and Flood Risk Management Guidelines for Planning Authorities*.

In this regard, the Office advises against the use of information from the Office of Public Work’s Preliminary Flood Risk Assessment (PFRA) and arterial drainage benefitting land maps to inform the SFRA. The planning authority will need to undertake adequate flood risk assessment to determine if there is sufficient information to inform zoning decisions or if further more detailed analysis is required.

Climate Action and Energy

The planning authority will be aware that the Office’s evaluation of the plan is required under section 31AM(2)(a) to address, in particular, matters within the scope of section 10(2)(n).

¹⁷ Page 6 of the Roscommon Issues Paper
¹⁸ Page 74 of the National Planning Framework

Having regard to the *Climate Action Plan 2019* and to the objectives of the NPF and the RSES, the transition to a low carbon economy and the overall reduction in carbon emissions will become a central issue for planning policies during the preparation of the plan.

The RSES states *‘Ireland’s necessary transition away from carbon-intensive sources of energy, towards more sustainable, renewable energy sources, will have a significant impact in the Midland counties in particular, including Roscommon.’*¹⁹

The Office acknowledges and supports the statements in relation to climate action, energy and environment on page 16 of the Issues Paper:

‘Roscommon County Council is committed to playing its role in achieving a transition to a low carbon, climate resilient and environmentally sustainable economy.’

‘The County Development Plan will put in place policies which are conducive to this and which will reduce to the greatest extent possible the risks associated with climate change.’

The Office understands that forthcoming updates, by the Department of Housing, Planning and Local Government, to the section 28 Development Plan Guidelines will contain guidance on the requirement under section 10(2)(n) of the Act to promote sustainable settlement and transportation strategies including measures to reduce energy demand and greenhouse gas emissions (in addition to adaptation to climate change), by virtue of the location, layout and design of new development.

Regarding climate change mitigation measures pertinent to section 10(2)(n) of the Act, section 6.2 – Transport and section 6.3 – Transport Investment Priorities (including RPOs 6.27, 6.28, 6.29, 6.30, 6.31 and 6.32) of the RSES are of relevance regarding the integration of land use and transport planning.

The promotion of renewable energy sources within the county in accordance with the section 28 Wind Energy Development Guidelines (2006), Circular Letter PL 5/2017: *Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change and Wind Energy Development Guidelines 2006 – Update on Review (July 2017)*, or any replacement guidelines issued by the Minister, will also be critical to ensure Ireland meets its national targets and commitments to increase renewable energy supply and reduce greenhouse gas emissions.

¹⁹ Page 165 of the RSES for the Northern and Western region

In this regard, the attention of the planning authority is drawn, in particular, to the SPPR under the aforementioned interim guidelines. This requires, inter alia, that the planning authority indicate how the implementation of the relevant development plan or LAP over its effective period will contribute to realising overall national targets on renewable energy and climate change mitigation, and in particular wind energy production and the potential wind energy resource (in megawatts).

Summary

The Office commends the planning authority for the preparation of this Issues Paper and supporting consultation material, and in particular for its strategies to engage with the community and encourage participation from younger people.

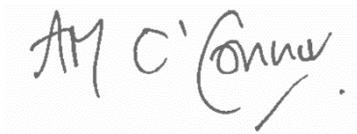
The Office advises the planning authority to pay particular attention to the following issues in the formulation of the county development plan:

- National and regional objectives for population growth, compact growth and regeneration in determining the Core Strategy, including the settlement hierarchy for your functional area. In this regard, the Office advises that population growth should be largely concentrated in Athlone and Roscommon Town.
- The need to prioritise the preparation of an Urban Area Plan for Athlone and a Local Area Plan for Roscommon Town informed by a local transport plan for each settlement.
- The need for consultation with transport agencies including the National Transport Authority and Transport Infrastructure Ireland, and neighbouring planning authorities, where relevant, during the preparation of land use and transport plans for Athlone, Roscommon Town and Carrick-on-Shannon.
- The inclusion of specific policies and implementation measures that encourage infill / brownfield development in the county's towns and the building of homes with the footprint of rural settlements.
- The coordination of economic development and employment with population growth which capitalises on strengths such as the high ratio of jobs to resident workers in the county's larger towns and addresses challenges such as population decline in both urban and rural areas.
- The development of rural housing policies that are consistent with NPO 19 of the NPF and Circular letter PL 2/2017 from the Department of Housing, Planning, Community and Local Government.
- The promotion of renewable energy sources within the county in accordance with the relevant section 28 guidelines.
- The promotion of sustainable settlement and transport strategies for urban and rural areas with measures to reduce GHG emissions, reduce energy usage and to adapt to climate change, in particular, through the location, layout and design of new development.

The Office looks forward to reviewing the draft development plan and is committed to continued positive engagement with Roscommon County Council in the implementation of national and regional policies at county and local level.

Please feel free to contact the staff of the Office in the context of your authority's responses to the above, which we would be happy to facilitate. Contact can be initiated through the undersigned or at plans@opr.ie.

Yours sincerely,



Anne Marie O'Connor
Deputy Planning Regulator

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