



Planning Ref: **Issues Paper for the Roscommon County Development Plan 2021-2027**  
(Please quote in all related correspondence)

**31/07/20**

Director of Services – Planning  
Planning Department,  
Roscommon County Council,  
Áras an Chontae,  
Roscommon,  
F42 VR98

Via *eReferral* or email

Re: Notification to the Minister for Culture, Heritage and the Gaeltacht under Article 28 (Part 4) or Article 82 (Part 8) of the Planning and Development Regulations, 2001, as amended.

**Proposed Development: copy from the planning authority's website (except if Part 8) – may need to reduce to key wording**

A chara

On behalf of the Department of Culture, Heritage and the Gaeltacht, I refer to correspondence received in relation to the above.

Outlined below are heritage-related observations/recommendations of the Department under the stated heading(s).

### **Archaeology**

The National Monuments Service of this Department welcomes the opportunity to respond to this call for submissions and sees it as an important element of our ongoing regular contact with your council through the planning referral system.

Archaeology is referred to frequently in the current County Development Plan and there is a clear awareness of the importance of the county's archaeological heritage as an educational, tourism, recreational and cultural resource. In addition, the procedures for referral of relevant planning applications to this Department, in accordance with the requirements of the planning legislation, are acknowledged. The usefulness of sources of archaeological information provided to the public by this Department (notably the Record of Monuments and Places and the online Historic Environment Viewer), is also mentioned. It will be important to ensure that the existing policies and objectives relating to archaeology are kept in the new County Development Plan.



The issue of proposed extensions to medieval graveyards is referred to in the current County Development Plan and with regard to this issue, the National Monuments would like to make the following observations.

The question of extensions to medieval burial grounds is a cause for concern for a number of reasons. Firstly, they can pose a direct threat to archaeological remains. Early-Christian and Medieval graveyards were often larger in extent in the past than they are today. Many were enclosed in the nineteenth century, with parts of the original graveyard left outside the later wall. An extension close to or directly outside the graveyard wall will therefore be very likely to disturb burials and other archaeological remains associated with the original graveyard.

Historic graveyards, with their ancient structures, headstones and high bio-diversity value, have great charm and a very particular atmosphere, which along with the tradition of burial there and perhaps an association with a local saint, make their continued use understandably important to local communities. Modern extensions to them however, and the impact of the associated access roads, car parks, modern styles of headstones etc, can erode the very character that makes such places special to people. Some proposals submitted to this Service for example, envisaged extensions to graveyards that would have been larger than the graveyards themselves and would have overwhelmed them.

It is therefore very important that policies and objectives in the County Development Plan should state that proposals for extensions which would be so large and/or so close to an existing historic graveyard, that they would endanger archaeological remains or fundamentally alter the amenity of the graveyard, will be discouraged.

To that end, the following policy objectives should be included in the new County Development Plan:

Objective 6.28 Archaeologically significant burial grounds will not be considered for extension if such an extension would constitute a proven risk to the archaeological heritage, by means of a direct impact on archaeological features and/or a negative impact on the amenity of the existing graveyard.

Policy 8.49 Archaeologically significant burial grounds will not be considered for extension if such an extension would constitute a proven risk to the archaeological heritage, by means of a direct impact on archaeological features and/or a negative impact on the amenity of the existing graveyard.

### **Nature Conservation**

The Department welcomes the invitation to make a submission in relation to the Roscommon County Development Plan 2021-2027 Issues Paper. The Department received the notification request (dated 27<sup>th</sup> March 2020) on the 3<sup>rd</sup> June 2020 for written submissions/observations of the Roscommon County Development Plan 2021-2027 Issues Paper. Because of the Coronavirus, Covid- 19 restrictions, the deadline was extended by the planning authority to the 31<sup>st</sup> July 2020.



The following observations are made by the Department in its role as a statutory authority with overarching responsibility for nature conservation and the nature directives (i.e. the Birds and Habitats Directives). The observations are not exhaustive but are intended to assist the planning authority in meeting its obligations in relation to nature conservation, European sites, biodiversity and environmental protection in the process of reviewing and preparing the County Development Plan 2021-2027 for County Roscommon, hereafter referred to as the plan. The Department welcomes this opportunity to provide observations at this early 'Issues Paper' stage of the review process.

1. Government policy on nature conservation:

Government policy on nature conservation is clearly set out in the National Biodiversity Action Plan 2017-2021 (NBAP) and Ireland is fully committed to halting the loss of biodiversity and the degradation of ecosystem services as set out in the EU Biodiversity Strategy to 2020 and is a signatory to the United Nations (UN) Convention on Biological Diversity Strategic Plan for Biodiversity 2011-2020. These policies are reflected in Ireland's vision for biodiversity "*That biodiversity and ecosystems in Ireland are conserved and restored, delivering benefits essential for all sectors of society and that Ireland contributes to efforts to halt the loss of biodiversity and the degradation of ecosystems in the EU and globally.*" Never before has this statement been more relevant, the recent Covid-19 pandemic has highlighted the value of biodiversity in relation to our physical and mental wellbeing, there is an urgent need to protect our natural resources for present and future generations. A County Development Plan (CDP) that has biodiversity embedded in its core policies will help build a county that is a healthy place for its people and visitors, and provide a fully functioning and resilient ecosystem.

2. Nature conservation within the Plan:

It is important that the plan sets out the legislative requirements in relation to the protection of designated sites and protected species under both European (i.e. Birds and Habitats Directive) and national legislation (i.e. Wildlife Act 1976-2018), but in addition the plan should also ensure government policy on biodiversity can be delivered. Objective 1 in the NBAP is to "*Mainstream biodiversity into decision-making across all sectors*". There are real opportunities to protect and enhance biodiversity when considered early in any development proposal and in particular at strategic level. The Department would recommend that biodiversity is integrated into all sections of the plan and this can be achieved by the inclusion of an overarching policy whereby a suitably qualified ecologist will be part of any multi-disciplinary team involved in development plans or projects arising from the CDP. It is important when biodiversity measures are incorporated into development proposals that the measures are appropriate to the particular situation and they can be sustained long term (i.e. evidence based solutions to biodiversity protection and enhancement). The Department would encourage the use of Environmental Sensitivity Mapping<sup>1</sup> during the preparation of the plan and the use of the 'Ecosystem Services Scoring' approach; so as to avoid impacts

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<sup>1</sup> <https://airomaps.geohive.ie/ESM/>



on Natura 2000 sites and ensure biodiversity gain; and to avoid policies and objectives that undermine or are in direct conflict with natural heritage policies and objectives.

The review of the plan's policies and objectives should take place with a view to streamlining and strengthening policies and ensuring that they are consistent with current EU and National plans, reports, guidance documents and case law relating to biodiversity. The Department recommends that Appropriate Assessment (AA), as required under the Habitats Directive, is included in the draft plan as an overarching policy to ensure that all plans and projects flowing from the draft plan are subject to screening for AA and where necessary AA. Objectives in relation to AA should be clear and concise.

### 3. Natural Heritage Objectives:

The Department notes the council's existing strong commitment to biodiversity protection under the current County Development Plan 2014-2020, and it is hoped that this focus on biodiversity protection will continue when reviewing the natural heritage objectives as part of the plan review process. The Department would like to commend the council on their achievements to date acknowledging the positive initiative of the Roscommon County Council Heritage Officer and County Roscommon Heritage Forum in surveying Roscommon's Swift populations, producing biodiversity downloadable posters, and promoting the importance of pollinators. The council should build on this commitment and seek to strengthen biodiversity protection within the plan area and its zone of influence. The county supports a rich and varied natural heritage all of which require strict protection; some of the habitats which are of particular note within the county include: raised bogs, turloughs, lakes, callows and orchid rich calcareous grasslands. The Department would also like to highlight the importance of a number of species of note that are recorded within the county, namely: curlew, hen harrier, common scoter, greenland white-fronted goose, whooper swan, pine marten, white-tailed sea eagle, marsh fritillary, serrated wintergreen (Ballydangan bog), birds nest orchid (St. John's Wood) and geyer's whorl snail.

The Department would recommend that natural heritage objectives are clear and robust, and there is an objective to protect, conserve and enhance biodiversity both within and outside protected sites, this will be critical if the council is to meet its obligations on nature conservation and Ireland meets its target to halt the loss of biodiversity. Where development projects arising from the plan are not subject to the legal requirements to prepare either an Environmental Impact Assessment Report (EIAR) or Natura Impact Statement (NIS) the impacts to biodiversity will best be facilitated through the preparation of an Ecological Impact Assessment (EclA), and the Department would recommend including this as an objective within the plan. Surveys carried out for the preparation of EIAR, NIS or EclA generally generate biodiversity data previously unknown or unrecorded in a county, and the Department would encourage the council to include an objective requiring this data is submitted to the National Biodiversity Data Centre (NDBC). This would strengthen the county's knowledge base on biodiversity and ultimately aid its protection.



#### 4. Threats and Pressures on Nature Conservation:

Roscommon County Council contains numerous habitats and species of international and national importance both within and outside designated sites as outlined already. The recent Article 17 report<sup>2</sup> on and Article 12 Report<sup>3</sup> under the Habitats and Birds Directives, respectively, have shown that even with strict protection these habitats and species are continuing to deteriorate. The Department notes that Roscommon County Council is fully committed to the protection of the designated sites across the county but the Department notes additional pressures on biodiversity which have occurred during the lifetime of the 2014-2020 plan. Specifically, in relation to increased tourism on, for example, Lough Ree Special Protection Area, in terms of disturbance to Species of Conservation Interest (SCI's) and from development activities, for example, near Castlesampson Esker Special Area of Conservation (SAC) which may impact on Annex I habitats; Turloughs [3180] and Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (\* important orchid sites) [6210]. Robust objectives are required to ensure the protection of habitats and species within Natura 2000 sites.

In addition, clear and robust objectives are required in respect of the strict protection of Annex IV species under the European Communities (Birds and Natural Habitats) Regulations, 2011, for example, species such as otter and all bat species listed under Annex IV, which are also protected outside of Natura 2000 sites, by these Regulations. The loss of trees and hedgerows can, in general, impact on bat species and other wildlife and affect the connectivity of hedgerows as wildlife corridors. Bat roosts can also be affected where there is redevelopment of old buildings e.g. from the loss of these available roost sites. A specific requirement in the policy objectives should include that surveys for these strictly protected species and other protected species under the Wildlife Act are included in all development proposals where there is a reasonable likelihood of the species being present and affected by the development.

The Department would recommend also that 'Lighting' objectives are included within the plan both for town and rural areas where incorrect types or inappropriate use of LEDs can have an impact on bat species and other wildlife. The Department would like to highlight the EUROBATs<sup>4</sup> and Dark Sky lighting recommendations<sup>5</sup> which provide further information on reducing the impact of lighting on wildlife, noting that the correct LEDs and lighting fittings can ensure that these impacts are avoided or minimised and reduce carbon emissions. It is imperative that the integrated environmental assessments in relation to the plan review, Strategic Environmental Assessment (SEA), Appropriate Assessment (AA) and Strategic Flood Risk Assessment (SFRA), applies the precautionary principal to ensure there is no further deterioration of habitats and species both within and outside designated across the county and its zone of influence. And that the draft plan addresses any unauthorised developments which impact biodiversity in the county, and the draft plan should include a policy that will ensure appropriate restoration works will be required where this occurs.

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<sup>2</sup> <https://www.npws.ie/publications/article-17-reports/article-17-reports-2019>

<sup>3</sup> <https://www.npws.ie/status-and-trends-ireland%E2%80%99s-bird-species-%E2%80%93-article-12-reporting>

<sup>4</sup> EUROBATs Series No. 8 publication, Guidelines for consideration of bats in lighting projects, 2018

<sup>5</sup> Dark Sky Ireland Lighting Recommendations, 2019



Biodiversity in general is under threat at a global, national and local scale, Ireland's recent report 6<sup>th</sup> National Report to the Convention on Biological Diversity<sup>6</sup> has identified that although some progress has been made by Ireland in achieving the targets, the rate of progress is not sufficient to halt the loss of biological diversity. However, the Department acknowledges the positive steps Roscommon County Council has undertaken to promote biodiversity within the county, for example the publishing of downloadable posters on 'Biodiversity', 'Bogs', 'Hedgerows', 'Landscaping your house with native species', 'Turloughs' and 'Wildflowers'. The council should continue to lead by example by ensuring the plan has a strong policy commitment to positive biodiversity actions. The Department would welcome the inclusion of a policy where all public buildings within the county incorporate positive biodiversity measures as standard practice. Actions can include simple measures, e.g. all new public buildings incorporate nesting boxes for swifts, the creation of wildlife habitats on public open spaces to more ambitious measures that will ensure 'biodiversity net gain' on public development schemes. Furthermore, there is an opportunity for Roscommon County Council to enhance biodiversity by including policy objectives, for example, to map the extent of hedgerows in the county, plant hedgerows to connect gaps in these corridors and include a pollinator plan for the county with particular attention to roadside verges, roundabouts and council.

The Department would also welcome the inclusion of a policy objective for the proposal to establish Lough Ree as a UNESCO Biosphere Nature Reserve and looks forward to working with the relevant Local Authorities and stakeholders on this proposal.

The Department would like to highlight the extent of Raised Bog habitats within Roscommon County and that development proposals on peatlands, (designated and non-designated) may be subject to the requirements of the planning code, the Environmental Impact Assessment Directive, (including EIA screening requirements where applicable), and the requirements of the Habitats Directive (including the need for screening for AA and AA), as appropriate. The Department recommends a strong and clear policy objective in the draft development plan (in relation to peat extraction to ensure clarity in relation to the requirements for planning permission provided for in the Planning and Development Act, 2000 (as amended) and the Planning and Development Regulations, 2001 (as amended) and environmental assessment in this regard. It is recommended that the draft plan include an objective to support the implementation of the National Raised Bog Special Areas of Conservation Management Plan 2017-2022; and the restoration measures currently underway and which could commence on protected raised bogs in Roscommon during the lifetime of this Plan as a positive conservation measure which will halt and reduce carbon loss in the County and enhance its Peatlands.

##### 5. Green Infrastructure (GI):

The 'Issues Paper' in relation to the plan supports the National Planning Framework in relation to compact growth in larger urban centres, the Department would advise that the

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<sup>6</sup> <https://www.npws.ie/news/ireland%E2%80%99s-6th-national-report-un-convention-biological-diversity-released>



promotion of green infrastructure should be integrated into these developments with a commitment to reverse the loss of green urban ecosystems. The Department would welcome a commitment in the plan to the preparation of an overall green infrastructure strategy for the county, as defined by the EU<sup>7</sup> and would like to draw your attention to the E.U definition of G.I. as an important link in the connectivity of European Natura 2000 sites in the County. A clear distinction should be made between G.I. and Greenways, Blueways and Peatways within the plan. As advised in the National Greenway Strategy, greenways and other associated linear trails should be designed to take into account, and avoid where necessary, the sensitivities of natural heritage. Whilst the development of Greenways, Blueways and Peatways is welcomed, the same risks to biodiversity can be associated with these type of trails, as with any other road development, and the Department would recommend the need to apply the precautionary principle when screening for Appropriate Assessment (AA) and/or undertaking AA for Greenways, Blueways and Peatways. The Department would recommend the inclusion of clear objectives with regard to the protection of trees, hedgerows and other habitats, which contribute to G.I., in the county.

#### 6. Climate Change:

Climate change is adding additional pressure to biodiversity and as an objective of the Department's Biodiversity Climate Change Sectoral Adaptation Plan- 2019 there is a requirement to "*Protect, restore and enhance biodiversity to increase the resilience of natural and human systems to climate change*". This objective is particularly relevant to all wetland habitats that provide an essential service in relation to flood alleviation. The Department would recommend clear policy objectives that ensure that undesignated wetland areas are protected within the plan.

The Department would like to highlight the restoration plans for Raised Bog Special Areas of Conservation (SACs), which will occur within the lifetime of this Plan. These types of restoration works will benefit the County by providing for increased carbon sequestration which will assist Roscommon in meeting its climate action objectives. The Department would welcome further consideration in the plan in relation to the restoration of these SACs and rehabilitation of cutaway Peatlands. And that carbon benefit analysis is applied to the consideration of proposals for the future use of cutaway peatlands, as a positive initiative in Roscommon's commitments to Climate Action. Roscommon County is predominately a rural county and ultimately developments should avoid the fragmentation of landscape features, including ecological corridors which allow for the mobility of species in a changing climate.

#### 7. Monitoring the impacts of the plan on biodiversity:

As stated in the 'Issue Papers' the development plan will be subject to environmental assessments and the Department would advise that particular attention should be placed on the requirements of Article 10 of the Strategic Environmental Assessment (SEA) Directive 2001/42/EC, whereby Member States are required to monitor the significant environmental effects of the implementation of plans. Monitoring during plan implementation should allow for corrective action and intervention if environmental damage is noted and it will provide a

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<sup>7</sup> [https://ec.europa.eu/environment/nature/ecosystems/strategy/index\\_en.htm](https://ec.europa.eu/environment/nature/ecosystems/strategy/index_en.htm)



learning opportunity for practitioners and decision makers for future land use plans. Monitoring can use existing sources of information including data collected by other government departments or agencies but the loss or enhancement of biodiversity due to development can only be adequately monitored and recorded through the planning process. For example, the Department would welcome consideration in monitoring Ammonia and Nitrogen deposition impacts on Natura 2000 sites within the draft plan's zone of influence in the SEA and ensuring that the precautionary principle is applied in this context to agricultural intensification within the lifetime of the plan. A policy objective is recommended which includes an assessment of the impacts of nitrogen deposition on nitrogen-sensitive Natura 2000 sites or Annex 1 habitats<sup>8</sup> outside European sites, for example, when considering the location of Bio-energy projects.

The Department would welcome a clear and specific monitoring plan to be included with the Strategic Environmental Report that would clearly outline how it is proposed to record the impacts of plan implementation on biodiversity, both in terms of biodiversity loss and biodiversity enhancement during the lifetime of the plan. The Department would also welcome the publishing of such reports.

The Department would welcome the opportunity to discuss any of the matters raised here if this would assist the planning authority in the process of preparing the County Development Plan.

You are requested to send further communications to this Department's Development Applications Unit (DAU) via **eReferral**, where used, or to [manager.dau@chg.gov.ie](mailto:manager.dau@chg.gov.ie); if emailing is not possible, correspondence may alternatively be sent to:

The Manager  
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Connor Rooney  
Development Applications Unit

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<sup>8</sup> Kelleghan, D. B., Hayes, E. T., Everard, M. & Curran, T. P. 2019. Mapping ammonia risk on sensitive habitats in Ireland. *Science of The Total Environment*, 649, 1580-1589  
<https://doi.org/10.1016/j.scitotenv.2018.08.424>.

