

ROSCOMMON COUNTY DEVELOPMENT PLAN 2020 – 2027

SUBMISSION

To: County Development Plan Review
Forward Planning
Planning Department
Roscommon Co. Council
Aras an Chontae
Roscommon
F42 VR98

From: Fergal Geoghegan

31st July, 2020



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To: County Development Plan Review
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I wish to make the following submission with regard to the current review of the Development Plan 2020 to 2027 for County Roscommon.

1. Architectural Conservation Areas

The designation of certain areas as Architectural Conservation Areas (ACA's) is an important feature of the County Development Plan (CDP). However, the identification, implementation and preservation of these areas could be improved. Merely drawing a red line around a particular area on a map and burying this map in the voluminous CDP and, thereafter, restricting development proposals, which are submitted by way of the planning system, is not satisfactory. The system requires improvement and constructive engagement with the relevant property owners/occupiers. Please consider the following:

- a) **Partnership:** There should be a co-ordinated joint effort or partnership between the Local Authority and the relevant property owners/occupiers so that the common goal of maintaining sustainable conservation in the designated areas can be achieved. The current arrangement of merely relying on imposing conditions or restrictions on submitted planning applications does not encompass all works that impact on ACA's. The encouragement of the setting up of a Property Owners/Occupiers Association in each ACA should be considered so as to provide a conduit for engagement in a successful partnership.
- b) **Engagement:** In order for the conservation objectives to succeed there must be constructive engagement with the owners and occupiers of all the properties located within the designated areas. This engagement should be in a form that works for both the relevant property owners/occupiers and the Local Authority. This engagement should involve consultation and discussion with the property owners/occupiers. It should commence prior to identifying the boundaries of the

areas to be declared as ACA's at the forward planning stage of the Local Area Plan or equivalent and it should continue throughout the lifetime of the ACA. This should be lead by the Heritage Office in Roscommon Co. Council and should have a system of communication and flow of information between the Heritage Office and the property owners/occupiers so that the objectives can be achieved. The system should be such that property owners/occupiers can readily obtain guidance and advice on works that they wish to carry out to the exterior of their properties. A helpful start would be to provide accessible information on the Co. Council website with advice and photographs of good practice. This information should relate to the ACA's within the county.

- c) **Encouragement:** The property owners/occupiers should be actively encouraged to maintain and develop their properties in a manner consistent with the objectives. This should involve providing information and advice on selecting colour schemes for external surfaces, design and use of materials for replacement windows, doors and other external features such as rainwater goods, boundary details, gates, signs, commercial shop fronts, etc. Property owners should be encouraged to co-ordinate colour schemes for public facing facades.
- d) **Identification:** The boundaries of the ACA should be acknowledged on site in a discreet or appropriate manner. This could perhaps involve the erection on site of colour coded signage and a notice with a map and relevant information. The public spaces, surfaces and street furniture should also reflect the presence of an ACA.
- e) **Maintenance:** Properties in these areas tend to have higher maintenance costs than that of more modern developments. Acceptable replacement materials tend to be more expensive and can be difficult to obtain. It should be the policy of Roscommon Co. Council to acknowledge these additional financial burdens imposed on property owners. This could be done by providing annual grant funding specific for each ACA's to encourage suitable maintenance and upkeep. This could be part funded by the commercial rates and property taxes levied on all the properties in the ACA. There should also be significant discounts on the normal annual commercial rates and property taxes for all properties located in these areas as an acknowledgement of the ACA. This would assist with promotion of the objectives of the ACA with the relevant property owners/occupiers. It would also acknowledge the restrictions and additional maintenance costs imposed by being located within an ACA.
- f) **Development:** There should be encouragement of sympathetic development in these areas which is beneficial to the common objectives of the ACA. An incentive could be to offer a 100% waiver of development levies for all approved developments in ACA's in acknowledgement of the additional costs and restrictions imposed by being located in an ACA. It is accepted that it is not

always easy or obvious to strike a balance between protecting the heritage of the past with the needs of the present and the aspirations for the future. Nevertheless, the requirements of modern life and commercial activity must be facilitated. It is pointless imposing restrictions or refusals on development which will only contribute to stagnation, decline and, eventually, abandonment of that which you are trying to protect. Very often properties in ACA's have to be adapted to facilitate modern sustainable use. Furthermore, properties in ACA's tend to have large undeveloped backland areas which have poor or inadequate access for modern use. The opening up of access to such backland areas can contribute significantly to the overall success of an ACA by providing for further development, off street parking and access for services. This can then permit enlargement of public pedestrian areas and the development of more interesting public spaces with hard and soft landscaping. Such backland and public space development can bring more activity and life to an ACA. There should be some tolerance for development which contributes to the common objective of maintaining sustainable modern use for properties in ACA's even where such development involves alteration of existing elements of the structure. In particular, necessary alterations to structures which benefit the common good, beyond the confines of the property, should be favourably considered, for example the opening up of access to backland areas. The policies of Roscommon Co. Council for controlling development in ACA's should be interpreted in such a manner which encourages sympathetic development of such properties. The emphasis should be on what can be done. It should be positive. The objective of Roscommon Co Council should be to look to the future but protect the past. People have to live and work in ACA's and it is in the public interest that such areas are successful and thriving. Museums can have areas of stagnant repositories of the past but ACA's have to facilitate and adapt to modern life in order to be sustainable, successful and lasting.

2. Protected Structures:

The trust of the above comments can also be applied to the policies relating to protected structures.

30th July, 2020