



**Roscommon County Development Plan 2021-2027- Issues Paper**

Response submitted by Meabhann Crowe of MKO on behalf of their Client, Glenveagh Properties PLC

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Roscommon County Council  
Forward Planning  
Aras an Chontae  
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**Our Ref:** 200613  
**Your Ref:**

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**Electronic Submission**

**Re: Roscommon County Development Plan 2020-2021 – Issues Paper Consultation**

Dear Sir/Madam,

On behalf of our client, Glenveagh Properties PLC, MKO submit to Roscommon County Council the following comments on the County Development Plan 2021-2027 Issues Paper consultation.

Our Client is taking an innovative approach towards the planning, design and building of high-quality homes across the country at densities consistent with the National Planning Framework ('NPF') and the Regional Spatial and Economic Strategy ('RSES') for the various regions. Such an approach is key to ensuring that suitable lands are developed in the most efficient and sustainable manner feasible, to meet known housing shortages and to achieve aims and objectives of national policy and guidance.

Key National Strategic Outcomes ('NSOs') of the NPF which should be borne in mind in the emerging Development Plan include:

- National Policy Objective 3c: 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 footprints.
- National Policy Objective 4: Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.
- National Policy Objective 13: In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well-designed high quality outcomes in order to achieve targeted growth. These standards will be subject to a range of tolerance that enables alternative solutions to be proposed to achieve stated outcomes.

At regional level, the RSES identifies Athlone as a Regional Growth Centre, a portion of which lies within County Roscommon at Monksland (refer to Figure 26 of the RSES). The NPF goes on to state that "*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.*"

While Athlone is viewed as the main growth driver, the RSES acknowledges that other settlements in the vicinity "*may provide alternative residential and employment options...*" The planned development of Local Area Plans for settlements in the vicinity, including Monksland/Bellanamullia will support compact growth.

RPO 3.71 calls for a cross-boundary Joint Plan to be prepared for Athlone by Westmeath and Roscommon County Council's in collaboration with the two Regional Assemblies. The Plan will identify strategic and employment development areas and "*promote greater coordination and sequential*



*delivery of serviced lands for development, to realise Athlone’s status as a Regional Growth Centre.”* As such, the ability of settlements within the Athlone settlement boundary – such as Monksland – to assist in the delivery of growth for the region cannot be overlooked.

Roscommon is included in the RSES as a Key Town, with a recorded population in the 2016 Census of 5,900. The RSES drives a growth of at least 30%, relative to the Census 2016 records (Regional Policy Objective RPO 3.2(c)). RPO3.1 places emphasis on significant compact growth in Key Towns in the RSES area. Within the RSES the Key Town of Roscommon is considered the *“principle town and administrative centre of the county”* and is strategically located to deliver growth to the region. RPO 7.16 aims to *“Ensure that appropriate policies are outlined in development plans to deliver housing in the areas and quantities identified in this Strategy.”*

To achieve the growth envisaged, the RSES seeks to *“incorporate innovative design solutions”*. The RSES supports residential design which transitions from *“traditional density led residential development as an indicator to one where integration with other land uses is given weight.”* It adds that *“Delivery of high-quality places rests with the construction industry, planning authorities and other public agencies working in partnership, and at all times engaging local communities in the development of ideas and plans”*

### **Question Posed & Responses**

#### ***Q: Do you agree with the [above] hierarchy or how should it be changed?***

The hierarchy shown in the Issues Paper transposed from the extant Development Plan is noted. It is considered that this hierarchy will require revision given the importance being afforded in the RSES to the future role of Athlone and its influence on County Roscommon,. The RSES considers the Athlone Regional Growth Area to be of such importance, that it calls for the preparation of a cross-boundary Joint Urban Area Plan between Roscommon County Council and Westmeath County Council. On that basis the settlement hierarchy in the emerging Development Plan for County Roscommon should be updated to align with the higher order statutory plans. The Athlone West (Monksland) settlement requires to be included as a Tier 1 Settlement in the hierarchy alongside the town of Roscommon. This will not only ensure Roscommon benefits from the growth and investment likely to arise from the new Joint Plan and influence of Athlone as a Regional Growth Area, but it will also work towards the creation of more balanced growth across the county.

#### ***Q: Where in the county should population growth be directed to achieve balanced growth as per the NDF and RSES?***

The RSES commits to achieving a balance of growth and supports compact growth models in line with the NPF. The RSES positions Athlone as a Regional Growth Centre, straddling the Eastern and Midlands Regional Area and the Northern and Western Regional Area. As noted above, the Athlone West area should be a focus for growth in the emerging Development Plan as part of the Regional Growth Centre. It is imperative that the emerging Development Plan takes full opportunity to build on the asset that is the emerging Athlone Joint Plan area and that growth strategies align.

Outside of the Metropolitan Area Strategic Plan (‘MASP’) area and Regional Growth Centres, the identified Key Towns will be expected to be key drivers of that growth.

Roscommon is the only Key Town identified in the Roscommon area. Roscommon is described in the RSES as *“the principal town and administrative centre of the county. It is 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.”*

It is critical that the provision of sufficient housing is aligned with targeted economic growth areas, to



reduce out-migration, sustain the ongoing growth of the Key Town in the first instance and allow sufficient choice for all market sectors.

***Q: How can younger adults be encouraged to remain in or return to County Roscommon?***

There is a drive at regional level to reinforce and extend employment and service functions within the County and the Key Town. Housing however underpins this; the provision of the correct type and level of housing units in existing communities in close proximity to services and facilities is key. Growth Ambition 1: Economy and Employment of the RSES focuses on “*further improving the solid foundations for successes, creating opportunities for individuals, businesses, the community and future generations.*” Key in maximising long-term economic development includes human capital – not only in terms of education and skills, but in retention of a working population to reinvigorate communities in which they live. Provision of suitable housing, and housing choice is key. The development of new housing must result in the creation of extended or new vibrant and cohesive communities. Appropriate levels of services and facilities must also be provided for and considered under any growth plans.

***Q: What issues relating to population and housing do you think should be addressed?***

If the aims of the RSES are to be achieved in the emerging Roscommon County Development Plan availability of jobs and suitable homes must be aligned to assist in attracting people (back) to Roscommon. The challenge facing Roscommon County Council is to provide a strong employment base to cater for the resident population and to redress unsustainable commuting patterns.

That said, in keeping with the thrust of the NPF and the RSES, the emerging Development Plan must ensure that communities are created as opposed to monotonous housing developments with little in the way of social and physical infrastructure. The creation of communities with commensurate levels of social and physical infrastructure is critical in creating vibrant, attractive places where people want to live and remain over the course of their lifetime.

***Q: What type of housing would encourage you to live in a town or village?***

To encourage people to live in the local area and thereby create sustainable communities, the emerging Development Plan must ensure it provides for a range of homeowners. As touched on above, the RSES states that residential design will need to move from “*traditional density-led development*” to one where “*integration with other land uses is given weight.*” Speed and quality of construction are specifically highlighted in this context. Our Client is supportive of this stance. There is onus on the construction industry to deliver high-quality places however the site zoning process at Development Plan level plays a significant role in achieving strong places and spaces, as does the associated Development Plan standards.

The changing household size and demographic will impact on the type of housing provided and to respond to these future changes, some degree of flexibility in planning and standards will be required. In order to deliver high quality units whilst maintaining residential amenity, a new approach to housing design and the flexible application of development management standards will be required going forward.

The new and innovative housing model proposed by our Client caters for the needs of different age profiles from those buying their first home to retirees all within the same development, reflecting the RSES and NPF. This Plan review process presents an opportunity for the Planning Authority to ensure the correct policy framework is in place to allow this to happen on the ground.

Our Clients response to these directions has been to devise a range of housing typologies which first and foremost provide sustainable, liveable, welcoming and adaptive places to live. In doing so, compact growth is delivered along with a hierarchy of open spaces and environments which are not car-dominated. New homes need to be flexible to meet the needs of a range of household types and sizes, and to meet individual households’ changing needs over time therefore a ‘one size fits all’ approach will



not work into the future. Our Client's approach accords with the thrust of national, regional and local policy, providing appropriate densities and tailored urban design can facilitate the framing of streets, enable the creation positive spaces and places and enhance community through the inclusion of shared surfaces which can give priority to the pedestrian. Own-door housing can provide for better consumer choice and a more viable product. The use of contemporary and innovative design solutions should be encouraged with a flexibility in the application of development management standards.

Local context and demand profile will have to drive what the market ultimately delivers, and while this can flex and respond to a degree, ultimately the planning policy framework in play will equally have to have a degree of flexibility enshrined in it.

***Q: Do you think that there should be a greater choice in terms of housing type and provision in our settlements? Q: How could this be achieved?***

As noted above, a greater choice of housing type with adaptability built-in will serve to retain a population and encourage others to locate in the Plan area.

It is noted that Planning Authorities and An Bord Pleanála are required to apply specific planning policy requirements ('SPPRs') of the guidelines, within the meaning of Section 28 (1C) of the Planning and Development Act 2000 (as amended), in carrying out their functions. In that vein, the Urban Development and Building Heights Guidelines for Planning Authorities (2018) includes SPPRs relating to compact growth, densities and building typologies as follows:

*“SPPR4: It is a specific planning policy requirement that in planning the future development of greenfield or edge of city/town locations for housing purposes, planning authorities must secure:*

- 1. the minimum densities for such locations set out in the Guidelines issued by the Minister under Section 28 of the Planning and Development Act 2000 (as amended), titled “Residential Development in Urban Areas (2007)” or any amending or replacement Guidelines;*
- 2. a greater mix of building heights and typologies in planning for the future development of suburban locations.”*

In addition, Section 7.10 and 7.11 of the Sustainable Residential Development in Urban Areas Guidelines (2009) make clear how design should be utilised to achieve a strong development response:

- *“Qualitative standards should be the real test, and innovative design solutions which achieve good performance standards should be considered on their merits”.*
- *“Innovative dwelling design should be encouraged in order to facilitate the potential future provision of adaptable and accessible accommodation”.*

In responding to what the residential market wants and creating a policy framework which best responds to this, our Client are happy to engage with the Planning Authority on this point and discuss the matter in more detail with a view to informing the emerging policy for Roscommon.

The inclusion of a specific policy which ensures that a suitable variety and mix of dwelling types and sizes is provided for in developments to meet different needs, having regard to demographic and social changes which might occur over the lifetime of the Plan, is supported.

***Q: How can our urban areas best accommodate increased residential density?***

Urban areas can best accommodate increased residential density by ensuring the application of rigid Development Management Standards is not something which is employed by the Planning Authority going forward. The review of the Development Plan presents the Authority with the opportunity to ensure the emerging policy framework is fully informed and fit for purpose. In that vein the National Planning Framework recognises that there is a clear requirement now to focus on how best to deliver a



range of housing types in urban areas, at increased densities to make best use of land. There is a renewed focus on increased building heights to assist increased residential densities, however there are other means such as innovative housing design, facilitated by a relaxation in Development Management Standards, which must be part of the conversation.

To deliver the NPF's target of 30% of all new homes within the existing built-up areas, to continue to promote compact growth and meet the RSES aims of creating high quality vibrant settlements, the Authority should give consideration to the following when drafting Development Plan policy:

- Looking beyond the conventional 3/4 bed semi-detached and apartment model Ireland has become accustomed to.
- Consider innovative design principles to own door houses that facilitate higher density, appropriate levels of public and private open space provision, car parking, bike and bin storage ensuring that residential amenity is maintained.
- The need to provide market and affordable homes that meet the varied needs of our communities, from students to families to older people.
- The need for more homes that are flexible in terms of their accessibility and adaptability.
- How housing design responds to changing lifestyle demands e.g. working from home.
- Building new communities in which people want to live requires considerable master-planning to ensure we have the right mix of homes in terms of sizes, types and tenures.
- In reviewing how existing Development Plan Standards function, and what they in fact give rise to in the built form, consideration should be given to how open space is dealt with within proposed developments. The current and frequently prevailing guidance focuses on the delivery of single, large open spaces within schemes. These are commonly not utilised by residents, do not present opportunity for community integration and cohesion and often remain un-maintained. A more pragmatic approach is suggested as part of the innovative house typologies being devised by our Client. Usability and functionality of spaces in new developments needs to be considered in more detail, and potentially in the context of existing spaces in the wider vicinity. Smaller better designed 'pocket parks' can result in more vibrant spaces with better community interaction. A series of spaces can assist in the creation of different character areas within a development. While every space need not have a prescribed function, the practicality of the space and its attractiveness to residents and communities should be a consideration in the emerging Plan, and be supported by suitable guidance/policy which is capable of adapting and flexing to the specific site requirements in question.
- In order to achieve the aims of the RSES while ensuring the resulting places created over the Plan period are fit for purpose, the Council's policies and Development Management Standards should allow for a degree of flexibility, focusing on design led and performance-based outcomes, rather than applying absolute requirements in all cases. Our Client welcomes the translation of this sentiment into the emerging policy framework.

The Issues Paper does not include density proposals, however in the context of the NPF and RSES which advocate compact growth, balanced against the geographic and economic challenges of the Plan area, it would seem logical to ensure the density ranges prescribed in any emerging Plan are balanced, realistic and flexible to accommodate all scenarios. The densities of the extant Development Plan – 20 units per ha in all Tier 1 and 2 settlements – is no longer aligned with national or regional policy and as such should not be applied in a rigid and inflexible manner.

Densities must be appropriate to site context, and to overarching national and regional policy whilst at the same time must be achievable. To achieve this, a flexible approach to development management standards must be adopted which avoid overly prescriptive requirements, which render all schemes repetitive and uninteresting. Reference to Section 28 Ministerial Guidelines Sustainable Residential Development in Urban Areas (2009) is made in this regard which states:



*“Planning authorities should ensure that the cumulative effect of setting specific minimum quantitative standards for parking, private and communal open space, and separation distances between dwellings does not militate against the achievement of the minimum residential densities recommended in Chapters 5 and 6. Qualitative standards should be the real test, and innovative design solutions which achieve good performance standards should be considered on their merits.”*

In essence the Plan should encourage residential schemes to adopt innovative design solutions which engender a strong community focus, provide practical mixed tenure and which create a sense of place and high residential amenity.

***Q: What house types do you consider need to be provided? For example, housing for the elderly, retirement villages, single occupancy units, apartments, detached dwellings etc.***

The National Planning Framework emphasises the need to build resilience into housing, focusing on homes that can accommodate changing needs over its lifetime (National Policy Objective 34). The RSES supports through Policy RPO 7.19 *“provision of a lifetime of adaptable homes that can accommodate the changing needs of a household over time.”* To ensure sustainable resilient communities are created it is imperative that the emerging policy framework for the coming 6 year period remains flexible to meet changing demand and market fluctuations.

## **General Comments**

The following sections contain some general comments with regards Development Management Standards which will be reviewed as part of the Development Plan review process. We reserve the right to expand on these points in subsequent submissions to the Draft Plan once published.

### General Comments

A provision within the Development Plan is requested that facilitates innovative design and that meets the following suggested performance criteria:

- Privacy/Protection of Residential Amenity;
- Acceptable level of quality private and public amenity space;
- Appropriate management of shared spaces within a residential development;
- Removal of cars off the streets while maintaining Local Authority quantitative standards;
- Appropriate bin storage and cycle parking locations within the curtilage of the unit.

### Urban Design Principles

The Issues Paper contains no information regarding urban design. In formulating future design policy, the Planning Authority are encouraged to note the direction from national policy in the NPF:

*“National Policy Objective 13: In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well-designed high-quality outcomes in order to achieve targeted growth. These standards will be subject to a range of tolerance that enables alternative solutions to be proposed to achieve stated outcomes.”*

In addition, the provisions of the Sustainable Residential Development in Urban Areas (2009), associated Urban Design Manual (2009) and other Section 28 Ministerial Guidelines also provide useful direction. The Sustainable Residential Development in Urban Areas (2009) states:

*“Planning authorities should ensure that the cumulative effect of setting specific minimum quantitative standards for parking, private and communal open space, and separation distances*



*between dwellings does not militate against the achievement of the minimum residential densities recommended in Chapters 5 and 6. Qualitative standards should be the real test, and innovative design solutions which achieve good performance standards should be considered on their merits.”*

Emerging policy should ensure the delivery of a high-quality built environment while ensuring innovative design solutions are encouraged and that proposals are viewed from a qualitative perspective first and foremost. To support this, a policy framework must exist which provides for flexibility in the application of development management standards in instances where high quality design and layout has been demonstrated.

#### Design, Layout and Housing Mix

Our Client welcomes the opportunity to be involved in the shaping of future policy which will in turn shape new developments in the Roscommon area. Innovative dwelling types may allow for a reduction in ‘normal’ development management standards and as such it is respectfully suggested that policy wording should include flexibility in the interpretation of standards where innovate and well-conceived scheme are being proposed.

#### Parking Standards

Our Client fully supports the aims at various tiers of the planning hierarchy to reduce car dependency, acknowledging that a modal shift to more sustainable means of transport is required to assist in meeting climate change and zero carbon targets. That said, there is a commercial reality which needs to be considered. It is the case that in this country there are numerous large towns and indeed suburbs which are not served well by public transport, the result of which is a higher rate of car dependency in homeowners. As noted in the Issues Paper, a significant proportion of the area is rural and the presence of a ‘commuter catchment’ area means it is likely that an overly-prescribed response to the matter of car use and parking should not be compiled.

Settlements exist within the Development Plan boundary which are and are likely to remain deficient in terms of public transport infrastructure, however this in itself should not deprive such areas of residential growth. In such areas or in areas where road infrastructure improvements are planned, car dependency remains and must be catered for through a policy and design response which is realistic. Added to this is the fact that it is often the case that both adults in an average household work, and that children are living at home longer, means that there may be occasions where lower thresholds aspired to cannot be met in full.

We would therefore encourage the Council to address this issue by building-in some flexibility to emerging policy and standards, particularly where public transport/infrastructure deficiencies or limitations are apparent, adding that *“Any deviation from these standards will require to be fully justified by the Applicant.”*

This submission requests that Roscommon County Council gives further consideration to the ability of Development Management Standards to include a degree of flexibility with regards residential schemes in the context of layout, separation distances and private open space requirements whilst also recognising that the ultimate aim is to produce high-quality positive living environments where amenities of future/existing residents are not compromised. Such an approach would give developers and the Council the tools to achieve the policy objectives set out across all tiers of the planning hierarchy.

In conclusion, it is respectfully requested that Roscommon County Council consider the above responses in their preparation of the Draft Development Plan to ensure the emerging Plan provides a strong yet flexible planning framework for future growth. As part of this process, it is considered that



engagement with the housebuilding sector is critical to ensure a fit for purpose Plan exists going forward and on behalf of our Client welcome the opportunity to engage with the County Council to discuss in more detail the innovative housing models being progressed.

Should the Planning Authority require further clarification or information on any matter raised in this consultation response, please do not hesitate to get in touch.

Yours faithfully,

  
**Meabhann Crowe, MRTPI**  
**MKO Planning**

c.c     **Glenveagh Properties PLC.**

