



Oifig an
Rialaitheora Pleanála
Office of the
Planning Regulator

29th July 2022

Planning Department
Roscommon County Council
Aras on Chontae
Roscommon
F42 VR98

Re: Issues Paper for the Boyle Local Area Plan 2023 - 2029

A chara,

Thank you for your authority's work in preparing the Issues Paper which will inform the preparation of the Boyle Local Area Plan 2023-2029 (the LAP). The LAP will replace the Boyle Local Area Plan 2015 - 2021, which is the current statutory LAP for the town.

The Office welcomes the timely commencement of the review of the current LAP in view of the recent adoption of the Roscommon County Development Plan 2022 – 2028 (the Development Plan) and core strategy policy objective CS 2.14 to prepare a LAP for Boyle.

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

- Matters generally within the scope of section 19;
- Consistency with the objectives of the Roscommon County Development Plan including its core strategy, and the Regional Spatial and Economic Strategy for the Northern and Western Regional Assembly (the RSES);
- Consistency with the transport strategy of the National Transport Authority, where applicable;
- Ministerial guidelines made under section 28;

- Ministerial policy directives issued under section 29; and
- Such other matters as the Minister may prescribe under section 262 or otherwise prescribe.

The Issues Paper is structured around eight key themes including, amongst others, compact growth, town centre and regeneration, and sustainable transport and infrastructure.

The Office considers these themes are generally appropriate to help focus the public's attention on issues that are important for developing a LAP that is consistent with the objectives in the Development Plan and RSES.

The Office has set out some broad issues for your authority to consider in formulating the draft LAP under the following eight themes:

1. [Regional Spatial and Economic Strategy](#)
2. [Housing allocation and compact growth](#)
3. [Regeneration and Development](#)
4. [Economic Development and Employment](#)
5. [Infrastructure and Transport](#)
6. [Climate action and Flood Risk Management](#)
7. [Strategic Environmental Assessment and Appropriate Assessment](#)
8. [Other / procedural issues](#)

These observations are offered without prejudice to any 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, or to be consistent with the fullness of the detailed policy context of the higher order plans and strategies and Ministerial guidelines.

Regional Spatial and Economic Strategy

Section 20(5) of the Act requires the LAP to be consistent with the objectives of the Development Plan and any RSES applying to the area of the plan.

The provisions of the RSES that are relevant to County Roscommon have generally been translated into the Development Plan, including its core strategy. Therefore in ensuring consistency with the Development Plan, the planning authority can ensure that the LAP is generally consistent with the RSES.

The Office would suggest that in aligning with the RSES, the LAP may focus, in particular, on qualitative issues, taking due account of the strategic vision and five growth ambitions of the RSES, in addition to compliance with the relevant regional policy objectives (RPOs).

The Office notes that the RSES acknowledges the significance of the MedTech sector in County Roscommon including Vention Medical in Boyle. The Office also notes that the upgrading of the N61 route between Boyle and the Regional Growth Centre of Athlone is referenced in Regional Policy Objective (RPO) 6.8.

The LAP should also consider practical implementation issues and measures that can best be promoted via the policies and objectives of the LAP.

Housing allocation and compact growth

The Office notes that the core strategy in the superseded Roscommon County Development Plan 2015 - 2021 provided for a population increase of 367 persons over the 2015 – 2021 plan period and a requirement for 147 housing units and 11 hectares of residential land.

The Office notes that much of the lands zoned for New Residential in the current LAP appear to be still undeveloped and should be reviewed in terms of their

suitability to deliver on Boyle’s housing supply target of 190 units¹ for the 2022 – 2028 development plan period and requirements for compact growth under RPO 3.2.

The Office notes that the current LAP also contains relatively large areas of Strategic Residential Reserve lands which should also be reviewed in terms of their suitability to deliver compact growth and sequential development over the longer term.

The Office also notes that the current LAP has an extensive plan boundary which includes part of the town’s rural hinterland and stretches of ribbon development extending from the town. In this regard, the preparation of a new LAP provides an opportunity to review and refine the LAP boundary.

The Office notes the provisions under section 19(2)(b) of the Act, which provides that the LAP shall consist of a written statement and a plan or plans, which may include objectives for the zoning of land. The Office would caution against the introduction of any land use zoning objectives that would conflict with the core strategy and the housing supply target for the settlement, or with objectives for compact growth under the RPO 3.2.

Regeneration and Development

The RSES places a strong emphasis on the need for the regeneration of smaller towns and villages as a major priority action. This is supported by a number of RPOs including:

- RPO 3.3 – *Deliver at least 20% of all new housing in rural areas on brownfield sites;*
- RPO 3.2 – *To support the regeneration and renewal of small towns and villages in rural areas; and*
- RPO 3.9 – *Identify suitable development opportunities for regeneration and development that are supported by a quality site selection process that also addresses environmental constraints and opportunities.*

¹ Table 2.2 – Core Strategy Allocations in the Roscommon County Development Plan 2022 - 2028

The Office welcomes the emphasis on town centre and regeneration in the Issues Paper and agrees with the statement '*...there is a need to reimagine the town centre of Boyle to return it to a thriving place at the heart of community life and increase its attractiveness as a focal point where a community can interact.*'

The Office commends the planning authority for the public realm enhancements that it has completed to date and plans for a new community library as part of its implementation of *Boyle 2040*.

The continued implementation of *Boyle 2040* which the Development Plan includes as a strategic objective for the future growth and development of Boyle is critical for changing community perceptions and encouraging people to live in or close to the town centre.

The Office notes that the *Boyle 2040* identifies opportunity sites which have the potential for residential development on backland sites. It is important that such opportunity sites and others are clearly identified in the forthcoming LAP including assessment of any flood risk and specific implementation actions required to unlock their potential.

This may include a range of proactive land activation measures, which may include the use of compulsory purchase and derelict site orders.

The planning authority will be aware of the recently announced Croí Cónaithe (Towns) Fund which will initially focus on supporting refurbishment of vacant homes in regional towns such as Boyle and should be suitably promoted in the forthcoming LAP.

The planning authority is advised to provide, through the LAP, for monitoring and evaluation of implementation of clear and measurable targets for regeneration and brownfield development.

Economic Development & Employment

The office welcomes the focus in the Issues Paper on promoting economic growth and tourism development of a proper scale in the town.

Boyle's ratio of jobs to resident workers of 1.281 is above the average for settlements in the Northern and Western Regional Assembly area and provides a strong basis for continued commensurate growth consistent with its designated as a Self-Sustaining Growth Town and Development Plan strategic objective to promote its development as a driver of economic growth for North Roscommon.

The Office also notes the Development Plan contains a strategic objective to maximise the potential of developing Boyle as a tourist destination by facilitating the expansion of tourist attractions and developing a coordinated tourism product.

In respect of the land use implications to support the above strategic objectives, it will be important that the planning authority takes an integrated approach for land use and transportation for employment and tourism development to ensure that the need to travel by car is reduced or minimised.

In respect of retail development, the planning authority is reminded to take account of the town centre health check assessment including required key actions from the Retail Strategy prepared for the Development Plan.

Infrastructure and Transport

The Office notes that Appendix 4 of the Development Plan confirms that Boyle has adequate wastewater treatment capacity to cater for anticipated growth over the Development Plan period of 2022 – 2028.

The planning authority is requested to prepare an infrastructure capacity assessment to inform land use zonings in the LAP in accordance with the methodology set out in Appendix 3 of the *National Planning Framework Project Ireland 2040*.

In respect of section 10(2)(n) of the Act and the promotion of sustainable settlement and transportation strategies, the Office supports the development of the plan '*...to promote reduce car dependency and increased movement by alternative modes, including public transport and walking and cycling networks*' as outlined in the Issues Paper.

The Office notes that it is a policy objective (ITC 7.31) of the Development Plan to prepare a Local Transport Plan (LTP) for Boyle based on the Area Based Transport

Assessment guidance of the National Transport Authority and Transport Infrastructure Ireland.

In this regard, the Office advises the planning authority to translate key findings and practical implementation actions from the LTP into the LAP. The planning authority's attention is drawn to the approach used by Kildare County Council in the preparation of the Athy Local Area Plan.

Commitment to the proactive implementation of the *Design Manual for Urban Roads and Streets* (revised 2019) in the LAP will also assist sustainable and active transport modes, in addition to improvement of the street environment and the overall quality of life for the local community.

Climate Action and Flood Risk Management

Effective spatial policies need to be implemented to meet travel demand in a manner that avoids congestion, reduces the need to travel and limits greenhouse gas emissions. In this regard, it is important that the preparation of the LTP occurs in tandem with the preparation of the LAP to ensure that sustainable transport actions and solutions are fully integrated into the LAP as outlined above.

The planning authority will be aware of the need to prepare a Strategic Flood Risk Assessment (SFRA) as part of the forthcoming draft LAP, consistent with The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009).

Under section 4.23 of these Guidelines, where a planning authority is considering (in the plan) the future development of areas at risk of flooding, that would generally be inappropriate under the sequential approach (section 3.2), the planning authority must be satisfied that it can clearly demonstrate on a solid evidence base that the zoning will satisfy the Justification Test for the plan making stage (Box 4.1).

It is not sufficient that a justification test is left solely to be undertaken at a planning application stage. Your authority's attention is also drawn to the *Department of Environment, Community and Local Government Circular PL 2/2014* which clarifies that the application of the justification test also applies to existing developed areas of towns and cities located in Flood Zone A and B.

Further advice in relation to the above and other matters relating to the SFRA can be obtained from the Office of Public Works (OPW), and the Office would advise direct consultation with the OPW in advance of the publication of the draft LAP.

The Office would also advise that flood maps should be overlaid on proposed zoning maps to provide clarity and transparency for members of the public.

Regarding climate adaption, the Office would like to draw the planning authority's attention to *Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas, Water Sensitive Urban Design, Best Practice Interim Guidance Document* (2021).

Strategic Environmental Assessment and Appropriate Assessment

The Office notes the intent of the planning authority to undertake Strategic Environmental Assessment and Appropriate Assessment as part of the LAP.

The Habitats Directive Assessment of plans or projects as outlined in Article 6 (3) and (4) of the *European Communities (1992) Council Directive 92/43/EEC* on the conservation of natural habitats require that a Screening for Appropriate Assessment is prepared for the LAP. If it is concluded that likely significant effects on areas designated as Natura 2000 sites cannot be excluded, a Natura Impact Report must be prepared and an Appropriate Assessment must be carried out.

Other / procedural issues

The Office welcomes the planning authority's decision to publish an Issues Paper and invite submissions in respect of the preparation of a LAP for Boyle, in view of the discretion allowed by the planning authority in this regard under section 20(1) of the Act.

Summary

In summary, the Office commends your authority for the preparation of this Issues Paper.

The Office advises your authority to pay particular attention to the following issues in the preparation of the local area plan:

- Ensure that any lands zoned for New Residential are appropriate in terms of delivery of the housing supply target for Boyle in the County Development Plan, are serviced or serviceable within the plan period, and are consistent with compact growth and the sequential approach to development;
- Review the extent of lands zoned for Strategic Residential Reserve in the current LAP in terms of their suitability to deliver compact growth and sequential development over the longer term;
- Review and refine the extent of the LAP boundary to ensure it is appropriate in terms of promoting compact growth and discouraging ribbon development on the fringes of the settlement;
- Carry out a settlement capacity audit / infrastructural capacity assessment to inform land use zonings in the Draft LAP;
- Identify opportunity sites including from *Boyle 2040* which can support town centre regeneration and also include proactive land activation measures regarding same;
- The development of the LAP should ensure consistency with the principles set out in the Government's Town Centre First Policy;
- The LAP should be informed by a Local Transport Plan prepared in consultation with the NTA and TII as appropriate;
- Provide for monitoring and implementation of the various policies, objectives and actions in the final LAP.

The Office looks forward to reviewing the draft local area plan and is committed to continued positive engagement with your authority in 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.

Is mise le meas,

A handwritten signature in black ink that reads "AM O'Connor". The signature is written in a cursive style with a diagonal slash at the end of the name.

Anne Marie O'Connor

Deputy Regulator and Director of Plans Evaluations
