

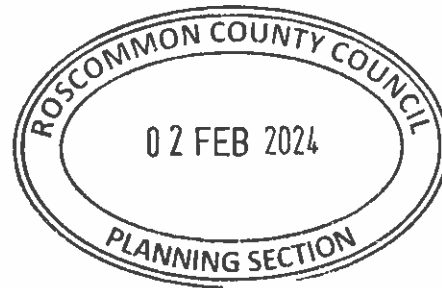


Óifig an  
Rialaitheora Pleanála  
Office of the  
Planning Regulator

OPR Ref: DP-041-22

2<sup>nd</sup> February 2024

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



**Re: Draft Roscommon Town Local Area Plan 2024-2030**

A chara,

Thank you for your authority's work on preparing the Draft Roscommon Town Local Area Plan 2024-2030 (the draft LAP).

The Office of the Planning Regulator (the Office) wishes to acknowledge the considerable and evident work your authority has put into the preparation of the draft LAP against the backdrop of an evolving national and regional planning policy and regulatory context and the need to balance competing pressures within an increasingly complex system.

As your authority is aware, a key function of the Office is the assessment of statutory plans to ensure consistency with legislative and policy requirements relating to planning.

The Office has evaluated and assessed the draft LAP under the provisions of sections 31AO(1) and 31AO(2) of the *Planning and Development Act 2000*, as amended (the Act), and this submission has been prepared accordingly.

The Office's evaluation and assessment has had regard to the current county development plan, the Regional Spatial and Economic Strategy (RSES) for the Northern and Western Region 2020-2032, and relevant section 28 guidelines.

Recommendations issued by the Office relate to clear breaches of the relevant legislative provisions, of the national or regional policy framework and/or of the policy of Government, as set out in the Ministerial guidelines under section 28. As such, the planning authority is required to implement or address recommendation(s) made by the Office in order to ensure consistency with the relevant policy and legislative provisions.

Observations take the form of a request for further information, justification on a particular matter, or clarification regarding particular provisions of a plan on issues that are required to ensure alignment with policy and legislative provisions. The planning authority is requested by the Office to action an observation.

A submission can include advice on matters that the Office considers would contribute positively to the proper planning and sustainable development of the area. The planning authority is requested by the Office to give full consideration to the advice contained in a submission.

### **Overview**

The Office welcomes the preparation of the draft LAP, having regard to the statutory requirements for same under section 19 of the Act. Roscommon Town has been identified as a key town under the RSES and the draft LAP will play an important role in ensuring the sustainable development and consolidation of the settlement over the draft LAP period.

The Office notes that the draft LAP is not accompanied by any supporting strategies or studies and does not appear to have been informed by same regarding important matters such as transport and social infrastructure. In this regard, the Office questions the status of the Roscommon Town Approaches and Movement Study which is referred to in section 7.4 of the Roscommon County Development Plan 2022-2028 (the Development Plan) and section 7.4 of the draft LAP, and seeks clarity on how the planning authority intends to satisfy Regional Policy Objectives (RPO) 6.26 and 6.27 of the RSES.

While the Office welcomes the consolidation of the draft LAP boundary and the omission of less sequentially preferable lands zoned for residential and employment in the Roscommon Town Local Area Plan 2014-2020, there is a need for additional information regarding the potential housing yield from lands zoned New Residential having regard to the density ranges for key towns contained in the *Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities (2024)* (Residential Development Guidelines).

Related to this is a need to provide further information in relation to the potential housing yield from the opportunity sites identified specifically for residential development so that

the draft LAP provides a holistic picture of the overall potential housing yield compared to the town's housing allocation in the core strategy of the Development Plan.

In terms of regeneration, the Office welcomes the identification of a number of key opportunity sites in and adjoining the town centre area. Roscommon Town has a high level of residential<sup>1</sup> and commercial<sup>2</sup> vacancy and it will be important for the draft LAP to set out actions and policies to proactively address this issue, and to include measurable targets for the plan period.

In terms of flood risk, it will be necessary for the planning authority to amend the flood mapping using the correct flood extents and to review its strategic flood risk assessment regarding the Justification Test, in particular for employment lands in consultation with the Office of Public Works (OPW). In addition, the Office considers that there is scope to include additional policy objectives to strengthen the sections of the draft LAP that deal with flood risk.

It is within this context the submission below sets out eight (8) recommendations and four (4) observations under the following eight (8) themes:

Key theme	Recommendation	Observation
<a href="#">Consistency with Regional, Spatial and Economic Strategy</a>	<a href="#">1</a>	-
<a href="#">Consistency with development plan and core strategy</a>	-	-
<a href="#">Population and compact growth</a>	<a href="#">2, 3, 4 and 5</a>	<a href="#">1</a>
<a href="#">Transport and accessibility</a>	<a href="#">6 and 7</a>	-
<a href="#">Flood risk management</a>	<a href="#">8</a>	<a href="#">2</a>
<a href="#">Climate action</a>	-	<a href="#">3</a>
<a href="#">Implementation and monitoring</a>	-	<a href="#">4</a>
<a href="#">Other matters</a>	-	-

<sup>1</sup> Northern and Western Regional Assembly (NWRA) RSES Two-Year Monitoring Report 2020-2022 -

Figure 22: Residential Occupancy, Vacancy and Dereliction levels in Roscommon 2016-2021

<sup>2</sup> NWRA RSES - Figure 12: Commercial Vacancy Rates by Prominent Town (Quarter 2, 2019)



## 1. Consistency with the Regional Spatial and Economic Strategy

The draft LAP acknowledges the town's status as a key town in the RSES and its role as an economic driver with an envisaged 30% increase in population.

Preliminary data from Census 2022 indicates that Roscommon Town's population increased by over 11% between 2016 and 2022 and that the town is generally on track to meet its population uplift target of 30% (Table 4 of the RSES).

Page 41 of the RSES makes reference to the '*specific opportunities and strategic priorities*' detailed for key towns in relation to developing urban places of a regional-scale (RPO 3.1).

In this regard, the Office considers that the draft LAP does not provide sufficient clarity in relation to the delivery or implementation of the key future priorities outlined specifically for Roscommon Town on pages 134 and 135 of the RSES, in particular those relating to compact growth, regeneration opportunities along Circular Road and redevelopment opportunities along Racecourse Road.

### Recommendation 1 – Alignment with the RSES

Having regard to:

- Regional Policy Objective 3.1 and the Key Future Priorities for Roscommon Town set out on pages 134 and 135 of the RSES; and
- Policy Objectives CS 2.5, CS 2.6 and CS 2.10 of the Roscommon County Development Plan 2022-2028,

the planning authority is required provide additional information and clarity in the draft LAP in relation to the delivery or implementation of the key future priorities for Roscommon Town and that this may require, among others, the inclusion of additional opportunity sites and policy objectives.



## **2. Consistency with development plan and core strategy**

Section 19(2) of the Act requires a local area plan to be consistent with the objectives of the development plan and its core strategy. This requirement also applies under section 20(5) of the Act.

The Office considers that the overall approach in the draft LAP which promotes consolidation and sequential development, and regeneration within the central area is generally consistent with the strategic objectives and core strategy policy objectives 2.10 and 2.11 outlined on page 29 of the Development Plan.

The Office also considers the housing targets and the policy objectives of the draft LAP to be generally consistent with the Development Plan and its core strategy, except where otherwise specified below.

## **3. Population and compact growth**

The Development Strategy is set out in section 3 of the draft LAP and appropriately focuses on, among others, compact growth and regeneration, and sustainable transport and mobility.

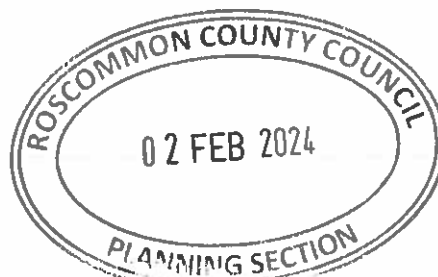
Table 4.1 sets out the population growth forecast to 2028 and 2031, and the residential land requirements. In this regard, the draft LAP projects that the population will increase by 1,778<sup>3</sup> persons by 2031 with a requirement for 600 new residential units and 17.15 ha of residential zoned land.

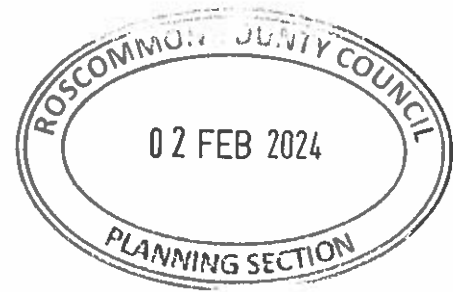
Based on information available, the Office understands that a total of 126 housing units were completed in Roscommon Town over the five-year period from 2018 to 2022. This amounts to an average of 25 units per annum and suggests that the target of 600 new units will not be achieved without a significant acceleration in housing delivery in the town.

In this regard, it is considered that the draft LAP would benefit from the inclusion of specific land activation measures for the seven opportunity sites, the development of which will be key in terms of compact growth. This is addressed in section 3.3 below.

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<sup>3</sup> 1,608 + 170





### 3.1 Tiered approach to zoning and housing yield

Chapter 4 of the *Development Plans, Guidelines for Planning Authorities (2022)* (the Development Plans Guidelines) outlines the approach for zoning that should be followed by the planning authority which is also applicable in instances where land use zoning occurs as part of the preparation of a local area plan.

The residential development strategy in section 4.2.1 of the draft LAP acknowledges the need to apply a tiered approach to the zoning of land consistent with National Policy Objective 72 of the *National Planning Framework (NPF)*.

The lands zoned New Residential are spread across seven sites / areas to the northeast and southeast of the town. All seven sites zoned New Residential have been appraised in the planning and infrastructural assessment in Appendix 1 of the draft LAP, and Tier 1. No Tier 2 sites are identified. Notwithstanding, the Office's assessment notes that network extensions may be required to service some sites such as sites 6 and 7 (southern). In this regard, the Office advises the planning authority to consult with Uisce Éireann and confirm that the designation of Tier 1 is appropriate.

These lands are all within approximately a 1.5km walk from the edge of the Town Core zoning and are generally contiguous to the existing built up footprint.

According to Table 11.1 (Land Use Zoning Extents), the total area zoned New Residential amounts to 15.22 ha, which could accommodate approximately 530 housing units assuming an average residential density of 35 units per hectare as referred to in the draft LAP.

The seven opportunity sites are the other preferred location for residential development, and could accommodate a further 180 housing units at an average density of 40 units per hectare, consistent with the lower end of the density range recommended for town centre areas of key towns in Table 3.5 of the Residential Development Guidelines.

Additional to this, the Existing Residential zoned lands will also facilitate a significant level of housing development.

The Office is satisfied, therefore, that the draft LAP provides sufficient zoned lands to provide for the town's housing supply target in a compact and sustainable manner.

The draft LAP should however be more transparent about the potential yield from the sites zoned for residential development (New Residential, Opportunity Sites, and Existing Residential).

In order to provide a holistic picture in the draft LAP information on housing yield should be provided in both Table 4.1, Table 11.2, and section 5.5 (Opportunity Sites) of the draft LAP.

### Recommendation 2 – Residential land supply and housing yield

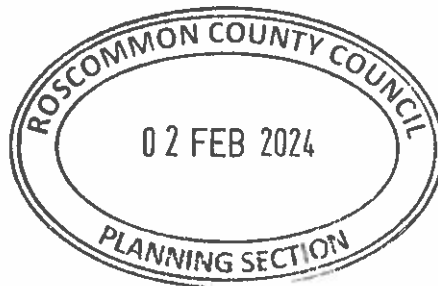
Having regard to:

- section 3.3.3 and Table 3.5 of the *Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities (2024)*;
- core strategy housing allocation for Roscommon Town in Table 2.2 of the Roscommon County Development Plan 2022-2028;
- core strategy Policy Objectives CS 2.4 and CS 2.5 of the Roscommon County Development Plan 2022-2028; and
- National Policy Objective 72(a) (tiered approach to zoning) of the *National Planning Framework*,

the planning authority is required to:

- i) provide details of the housing yield from lands zoned New Residential, Existing Residential (total estimated yield), and land identified as opportunity sites for residential development, and amend Table 4.1 (Population Growth Forecast and Residential Land Requirements), Table 11.2 (New Residential Lands), and section 5.5 accordingly; and
- ii) consult with Uisce Éireann and confirm that residential sites 6 and 7 and employment site 9 are appropriately designated in the infrastructure assessment as Tier 1 (serviced) rather than Tier 2 (serviceable), and, if necessary amend the tables in Appendix 1.





### 3.2 Residential density

Section 3.3 of the Residential Development Guidelines contains updated guidance on residential densities which includes for Key Towns (5,000+ population). Policy and Objective 3.1 on page 32 states:

*It is a policy and objective of these Guidelines that the recommended residential density ranges set out in Section 3.3 are applied within statutory development plans and in the consideration of individual planning applications, and that these density ranges are refined further at a local level using the criteria set out in Section 3.4 where appropriate.*

Table 3.5 of the Residential Development Guidelines contains density ranges for Suburban / Urban Extension areas of Key Towns stating:

*It is a policy and objective of these Guidelines that residential densities in the range 30 dph to 50 dph (net) shall generally be applied at suburban and urban extension locations of Key Towns and Large Towns, and that densities of up to 80 dph (net) shall be open for consideration at 'accessible' suburban / urban extension locations (as defined in Table 3.8).*

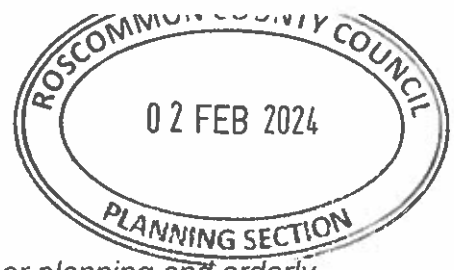
While it is acknowledged that Table 4.1 contains a proposed density figure of 35 units per ha and section 5.5 refers to a target average density of 35 units per ha, the Office considers that the planning authority's policy intent for density on lands zoned for New Residential and Existing Residential should be more explicit having regard to the density ranges for suburban areas referred to in Table 3.5.

Further, Table 3.5 of the aforementioned guidelines also contains density ranges for Centre and Urban Neighbourhood areas of Key Towns stating *'it is a policy and objective of these Guidelines that residential densities in the range 40 dph-100 dph (net) shall generally be applied in the centres and urban neighbourhoods.'*

In respect of residential density on opportunity sites which are zoned either Town Core or Outer Core, page 30 of the draft LAP states:

*...whilst some of the Opportunity Sites identified may have capacity for higher density residential schemes, other sites are better suited to a lower density, having*





regard to the site context and in the interests of proper planning and orderly development.

While this is considered reasonable, it is not made clear that the policy intention is to seek higher than an average residential density of 35 units per ha on opportunity sites where appropriate and site context and conditions are suitable.

### Recommendation 3 – Residential density

Having regard to:

- section 3.3.3 and Table 3.5 of the *Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities (2024)*; and
- proposed densities for key towns in table 2.2 of the core strategy and Policy Objective TV 4.17 of the Roscommon County Development Plan 2022-2028,

the planning authority is required to:

- (i) include additional policy objectives which clarify the density ambition for lands zoned New Residential, Existing Residential and the identified opportunity sites having regard to the density ranges for Centre and Suburban area for key towns contained in the above section 28 guidelines; and
- (ii) include a policy objective in Chapter 4 which states that the planning authority will implement the density ranges for key towns in section 3.3.3 of the *Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities (2024)*.

### 3.3 Regeneration

Section 5.5 of the draft LAP contains information on the seven residential opportunity sites located within the Town Core and Outer Core zonings. The sites identified comprise of infill, brownfield and backland sites and are intended to accommodate multi-unit residential developments at appropriate densities.

The Office commends the planning authority on the approach to regeneration in the draft LAP and considers that this is one of the strongest aspects of the plan.

While the information and policy direction provided for the seven opportunity sites in section 5.5 of the draft LAP is welcomed and generally consistent with RPO 3.9 and RPO 7.20, no information is provided on the potential housing yield that may emerge from the development of the sites individually or collectively. This matter is addressed in section 3.1 above.

The Residential Development Guidelines note that the Government is advancing a range of land activation and active land management measures to ensure that the potential for urban development and regeneration in the built-up area of cities and towns and at locations close to services and good quality public transport can be accelerated.

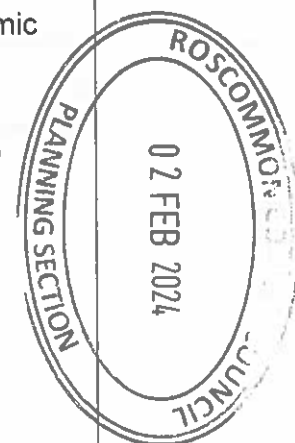
In this regard, there is an opportunity to supplement the information provided for each opportunity site in section 5.5 with further details on the anticipated land activation measures required to facilitate residential redevelopment. The Office advises that the inclusion of specific activation measures should be cognisant of any transport or regeneration strategies or plans prepared for the town.

#### Observation 1 – Opportunity sites

Having regard to:

- Regional Policy Objective RPO 3.1 of the Regional Spatial and Economic Strategy for the Northern and Western Regional Assembly;
- Policy objective TV 4.15 of the Roscommon County Development Plan 2022-2028; and
- Policy objectives RN 19 and RN 20 of the draft LAP,

the planning authority is advised to identify the key land activation measures required to facilitate the redevelopment of the individual opportunity sites and include this information in section 5.5 of the draft LAP.



### 3.4 White lands

The draft LAP contains 5.42 ha of unzoned white lands adjoining and inside the southwest and southeast draft LAP boundary. Section 11.11 states *'their inclusion in the Settlement Plan boundary reflects the fact that they function as part of the overall settlement, but given their peripheral location it is not appropriate to assign a land use...'*

and '...scope for appropriate development exists on these lands, subject to normal planning considerations'.

It is noted that proposals would be dealt with on their individual planning merits having regard to the location, context and surrounding environment.

The Office's evaluation notes that the said lands appear to be undeveloped and are not well located and would not contribute to compact growth and sequential development. The lands were not included in the planning and infrastructure assessment and it is unclear if the lands are serviced or serviceable. The Office considers that the lands should be zoned for an appropriate use subject to an infrastructure assessment or the LAP boundary amended to omit the subject lands.

#### Recommendation 4 – White lands

Having regard to:

- Regional Policy Objective RPO 3.1 of the Regional Spatial and Economic Strategy for the Northern and Western Regional Assembly; and
- Policy Objectives CS 2.5 and CS 2.6 of the Core Strategy of the Roscommon County Development Plan 2022 – 2028,

the planning authority is required to either zone the 'unzoned lands' referred to as 'whitelands' for an appropriate use subject to an infrastructure assessment or amend the LAP boundary to omit the subject lands. The planning authority is advised that the said lands are not considered appropriate for residential or employment uses.



### 3.5 Land use zoning matrix

The Office welcomes the inclusion of a land use zoning matrix in section 11 of the draft LAP which includes development types single residential unit and multi-unit residential.

Policy objectives RN 18 and RN 19 of the draft LAP promote the development of the seven opportunity sites for the delivery of new residential development in a compact form. The opportunity sites are close to existing services and amenities and generally within a 5/10-minute walk from the town centre and do not present an exhaustive list. The opportunity sites are zoned either Town Core or Outer Core.

The Office's assessment of the zoning matrix notes that multi-unit residential is permitted in principle on lands zoned Town Core and open for consideration on lands zoned Outer Core. In respect of a single residential unit, such development is open for consideration on lands zoned Town Core and permitted in principle on lands zoned Outer Core.

Having regard to policy intent in the draft LAP to facilitate compact development and higher residential densities on opportunity sites and within the Town Core and Outer Core, the Office considers that multi-unit residential development should be Permitted in Principle on lands zoned Outer Core and single residential unit should be Open for Consideration instead of Permitted in Principle.

The Office questions the rationale for including multi-unit residential development as Open for Consideration on lands zoned for Community Infrastructure, which section 11.8 states *'encompasses land on which a range of social, community and cultural facilities exist, associated with the delivery of key functions such as education, healthcare, amenity and leisure, culture, religion etc'*.

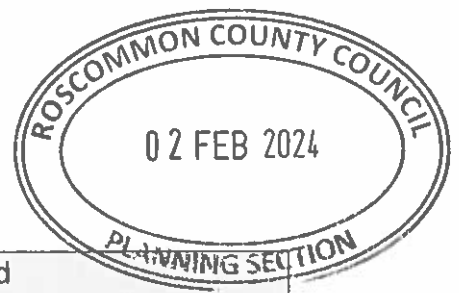
The Development Plan (policy objectives – ED 6.12 and ED 6.13) and draft LAP (policy objective RN 12) indicate that the town centre is the priority location for retail development. However, retail development is Open for Consideration across the majority of the zoning objectives including lands zoned New Residential and Strategic Industrial / Enterprise Zones. The Office questions the rationale for this approach since all of the lands zoned Strategic Industrial / Enterprise Zones and some of the lands zoned New Residential are proximate to the national road network and all are located towards the periphery of the settlement. Allowing such a flexible approach for retail development is not consistent with the policy objectives ED 6.12 and ED 6.13 in the Development Plan and *Retail Planning Guidelines for Planning Authorities (2012) (Retail Guidelines)*.

### Recommendation 5 – Zoning matrix

Having regard to:

- Regional Policy Objective RPO 3.1 of the Regional Spatial and Economic Strategy for the Northern and Western Regional Assembly;
- Policy Objectives CS 2.5, CS 2.6, ED 6.12 and ED 6.13 of the Roscommon County Development Plan 2022 – 2028;





- Policy Objectives RN 18 and RN 19 of the draft LAP; and
- the sequential approach to the location of retail development in section 4 of the *Retail Planning Guidelines for Planning Authorities (2012)*,

the planning authority is required to amend the land use zoning matrix to:

- (i) make multi-unit residential development Permitted in Principle on lands zoned Outer Core and Not Normally Permitted on lands zoned Community Infrastructure;
- (ii) make single residential unit Open for Consideration on lands zoned Outer Core; and
- (iii) provide guidance in the form of additional footnotes on the scale of retail development that is Open for Consideration on lands zoned New Residential, Strategic Industrial / Enterprise Zones and Community Infrastructure.

#### **4. Transport and accessibility**

The draft LAP aims to support the transition of Roscommon town towards a more climate resilient settlement, focusing on the delivery of accessibility, connectivity and sustainable modes of transport and recognises the need for effective integration of land use and transport planning. In this regard, the draft LAP states that the land use zoning framework has been developed to create a strong focus on compact growth.

##### **4.1 Local Transport Plan**

Policy objectives ITC 7.5 and ITC 7.31 of the Development Plan and RPO 6.27 of the RSES support the preparation of a Local Transport Plan (LTP) for Roscommon Town while RPO 6.28 requires that policies, objectives and measures which emerge from a LTP be incorporated into the LAP. RPO 6.26 also refers to the preparation and implementation of a LTP for key town to '*...encourage a travel mode shift from private vehicular use towards sustainable travel modes of walking, cycling and use of public transport*'.

As stated above, the draft LAP is not accompanied by an LTP and it is unclear how the Roscommon Town Approaches and Movement Study (RTAMS) referred to in section 7.4

of the draft LAP has informed same. It is also unclear what status the RTAMS has and what engagement occurred with the National Transport Authority (NTA) and Transport Infrastructure Ireland (TII) during its preparation.

The Office notes that Roscommon Town is the designated Decarbonisation Zone within County Roscommon and that the draft LAP aims to support the Draft Roscommon County Climate Action Plan (Draft Roscommon CAP) and to provide the framework for the transition of Roscommon Town towards a low carbon and climate resilient settlement.

In this regard, the Office notes that Objective (viii) in the Draft Roscommon CAP refers to the RTAMS and production of a transport plan for the town stating:

*Support the policy provisions contained in the RCC CDP 2022-'28 Chapters 7 & 8 and the Roscommon Town Approaches and Movement Study (RCC 2023), in terms of integrating land use and transport, promoting active travel and public transport use and the production of an area based transport plan for Roscommon town, and any supporting policy to be contained in the upcoming RTLAP.*

The Office considers that the absence of a transport strategy or study that is based on the Area Based Transport Assessment guidance of the NTA and TII, to inform the draft LAP, is a major shortcoming in the overall approach to preparing this draft LAP and needs to be addressed by either preparing a LTP or refining the RTAMS.

#### Recommendation 6 – Integration of transport and sustainable mobility

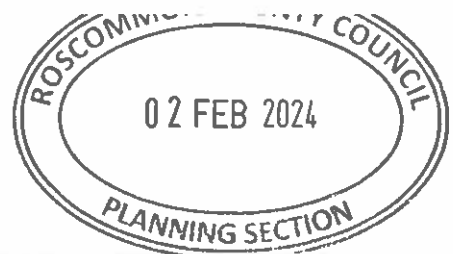
Having regard to:

- Regional Policy Objectives 6.26, 6.27 and 6.28 of the Regional Spatial and Economic Strategy for the Northern and Western Regional Assembly; and
- Policy objectives ITC 7.1, ITC 7.5 and ITC 7.31 of the Roscommon County Development Plan 2022 – 2028,

the planning authority is required to:

- (i) prepare a Local Transport Plan (LTP) or review and refine the Roscommon Town Approaches and Movement Study (RTAMS) in order to satisfy the





policy requirements which require the preparation of a Local Area Plan that is informed by a LTP; and

- (ii) integrate the relevant policies, objectives and measures from the LTP or RMATS.

The planning authority is advised to consult with the National Transport Authority and Transport Infrastructure Ireland and ensure the LTP is based on TII/NTA Area Based Transport Assessment Guidance (TII Publications Reference PEPDV-02046).

#### 4.2 National Roads

A number of national roads (N60, N61 and N63) pass through the town and provide access / connections to regional and national markets and larger centres such as Athlone and Galway City. The Office's assessment notes that a significant quantum of the lands zoned New Residential and all of the lands zoned Strategic Industrial / Enterprise Zones are located proximate to the national road network.

While it is acknowledged that the Development Plan contains policy objectives ITC 7.14 and ITC 7.15 which seek to maintain and protect the safety, capacity and efficiency of national roads and associated junctions, and to protect the national road network from inappropriate new access points and the intensification of existing accesses onto or adjacent to national roads, the Office considers that the draft LAP should be amended to include policy objectives which reflect the aforementioned policy objectives in the Development Plan.

This will ensure that the strategic function of the national road network in the LAP area is maintained consistent with RPO 6.5 of the RSES and National Strategic Outcome 2 of the NPF.

Policy objectives ED 6.12 and ED 6.13 of the Development Plan and RPO 4.45 support the policy principles of the sequential approach as outlined in section 4.4 of the Retail Guidelines.

While it is acknowledged that policy objective RN 12 seeks to '*encourage new retail and commercial enterprise proposals towards the town centre, with a focus on the uptake of vacant properties or brownfield sites*', the Office considers further policy direction should



be included specifically on retail development and national roads. The issue of flexibility afforded to retail development in the zoning matrix is addressed in section 3.3 above.

### Recommendation 7 - Policy objectives for national roads

Having regard to:

- Regional Policy Objectives RPO 6.5 and RPO 4.45 of the Regional Spatial and Economic Strategy for the Northern and Western Regional Assembly;
- Policy Objectives ITC 7.14, ITC 7.15, ED 6.12 and ED 6.13 of the Roscommon County Development Plan 2022 – 2028;
- sections 2.5, 2.6 and 2.7 of the *Spatial Planning and National Roads Guidelines for Planning Authorities* (2012);
- the sequential approach to the location of retail development in section 4 of the *Retail Planning Guidelines for Planning Authorities* (2012); and
- the location of lands zoned for New Residential and Strategic Industrial / Enterprise Zones that are proximate to the national road network (N60, N61 and N63) and the zoning matrix in section 11 of the draft LAP,

the planning is required to include policy objectives in sections 6 and 7 of the LAP which:

- (i) seek to maintain the strategic function of the national road network and protect it from inappropriate new access points and the intensification of existing accesses onto or adjacent to national roads; and
- (ii) reference the explicit presumption against large out of town retail centres located adjacent or close to existing, new or planned national roads/motorways reflecting national policy outlined in the *Retail Planning Guidelines for Planning Authorities* (2012).

The planning authority is advised to consult with Transport Infrastructure Ireland regarding the above.





## 5. Flood Risk Management

The Office welcomes the preparation of a Strategic Flood Risk Assessment (SFRA) to inform the draft LAP, which correctly refers to the flood relief scheme proposed for Roscommon Town.

Notwithstanding, the Office advises that the SFRA requires review and updating which will have consequential implications for the draft LAP. In particular:

- The Flood Zone mapping along the Jiggy/Hind watercourse, southeast of Circular Road and either side of Athlone Road appears to have used the incorrect CFRAM 10% Annual Exceedance Probability Mapping to define Flood Zone A.
- Land zoned Strategic Industrial / Enterprise Zones fronting the N63 to the east of the settlement is affected by Flood Zone A and does not appear to have been subject to the Justification Test. The planning authority is reminded that less vulnerable development is not appropriate in Flood Zone A unless all criteria of the Plan Making Justification Test have been satisfied.

While the Office welcomes the inclusion of a constrained land use strategy (section 9.4) and constrained land use zoning (map 3) which provides guidance regarding areas affected by flood risk, the Office considers that this approach could be improved by the inclusion of appropriate policy objectives in section 9.4 and by overlaying Flood Zones A and B on the land use zoning maps.

The Office notes that RPO 8.13 states '*support the delivery of flood defence works planned by OPW to be implemented in the short-term*'. In this regard, it is acknowledged that the proposed town flood relief scheme is referred to in the SFRA, however it is not mentioned in the draft LAP. The Office considers that section 9.3 of the draft LAP would benefit from the inclusion of a policy objective to support the development of the Roscommon Town flood relief scheme, and to ensure that zoning or development proposals support and do not impede or prevent the progression of the planned measures.



## Recommendation 8 – Flood risk management

Having regard to:

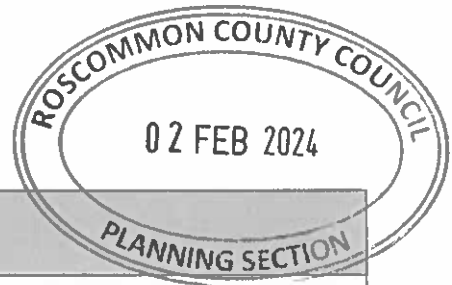
- Regional Policy Objective RPO 3.10 of the Regional Spatial and Economic Strategy for the Northern and Western Regional Assembly; and
- *The Planning System and Flood Risk Management Guidelines for Planning Authorities* (2009) (Flood Guidelines) as amended by *Circular PL 2/2014*,

the planning authority is required to:

- (i) review the flood mapping in the Strategic Flood Risk Assessment (SFRA) to ensure that the correct flood extents have been used;
- (ii) carry out a Plan Making Justification Test for the lands zoned Strategic Industrial / Enterprise Zones on the N63;
- (iii) ensure consistency between the final land use zoning maps and the Justification Tests and mapping in the SFRA; and
- (iv) consequent to (i) to (iii) above, where lands at risk of flooding have not passed the Justification Test, or are otherwise not in accordance with the aforementioned Flood Guidelines, the zoning objectives in the plan should be amended to ensure that highly vulnerable (Flood Zone A and B) or less vulnerable (Flood Zone A) development are not facilitated under the zoning.

The planning authority should consult with the Office of Public Works regarding this recommendation.





## Observation 2 – Flood Risk Policy Objectives

Having regard to:

- Regional Policy Objective RPO 3.11 and RPO 8.13 of the Regional Spatial and Economic Strategy for the Northern and Western Regional Assembly;
- Section 2.2 of the Strategic Flood Risk Assessment accompanying the draft LAP; and
- The constrained land use strategy (section 9.4) and constrained land use zoning (map 3) in the draft LAP;

the planning authority is requested to:

- (i) supplement section 9.4 of the draft LAP with policy objectives which clarify the policy intent for the constrained land use strategy;
- (ii) amend section 9.3 of the draft LAP to include a policy objective to support the development of the Roscommon Town flood relief scheme, and to ensure that zoning or development proposals support and do not impede or prevent the progression of the planned measures; and
- (iii) Overlay the Flood Zone A and B mapping on the constrained land use zoning (map 3).

The planning authority is advised to consult with the Office of Public Works regarding this observation.

## 6. Climate Action

Section 9.2 of the draft LAP deals with integrating climate action into Roscommon Town stating *'the aim of this Plan is to provide the framework for the transition of Roscommon town towards a low carbon and climate resilient settlement'*.

The LAP recognises that effective land use zoning can have a significant positive influence on climate action and that Roscommon Town can evolve as a sustainable energy community.

Roscommon Town is the designated Decarbonisation Zone within County Roscommon.

The draft LAP aims to support the Draft Roscommon CAP and provide the framework for the transition of Roscommon town towards a low carbon and climate resilient settlement.

While this is laudable, and the inclusion of climate action specific policy objectives (RN 45 – RN53) is welcomed, the policy objectives themselves are high-level and don't relate to any particular actions or recommendations from the RTMAS or the town's designation as a Decarbonisation Zone.

The Office notes that sections 5.3 and 5.4 of the Draft Roscommon CAP includes objectives and actions specifically related to the Decarbonisation Zone which could be incorporated into the draft LAP, for example Action 5 (Prioritise nature based solutions) and Action 8 (Explore renewable energy heat sources).

While it is acknowledged that the Draft Roscommon County Climate Action Plan is under preparation and the RTMAS was not included with the draft LAP, there is an opportunity for the draft LAP to include more specific policy measures and actions to give effect to and compliment the objectives and actions from the Draft Roscommon CAP which are specific to the Decarbonisation Zone and have a strong relationship to planning such as transport and Sustainable urban Drainage Systems.

### Observation 3 – Integrating climate action

Having regard to:

- Regional Policy Objective RPO 6.28 of the Regional Spatial and Economic Strategy for the Northern and Western Regional Assembly;
- Policy objectives CAEE 8.14, CAEE 8.17, CAEE 8.18 and CAEE 8.23 of the Roscommon County Development Plan 2022–2028; and
- the objectives and actions in the Draft Roscommon County Climate Action Plan,





the planning authority is requested to include additional and more specific climate action policy objectives in Chapter 9 which relate to policy measures and actions in the council's climate action plan and Roscommon Town's status as a Decarbonisation Zone.

## 7. Implementation and monitoring

The *Local Area Plans, Guidelines for Planning Authorities* (2013) encourage planning authorities to periodically review the success or otherwise of the implementation of the policies and objectives of a local area plan within the life of the plan by effective monitoring systems. Such monitoring could include reviewing progress achieved in regarding the policy objectives in the LAP such as to track housing delivery in respect of the town's housing allocation and progress in achieving a 30% compact growth target.

The planning authority is advised to include a commitment to plan implementation and monitoring of the LAP, which should include key indicators that the planning authority wishes to monitor over the life of the LAP.

### Observation 4 – Monitoring and implementation

Having regard to section 6 of the *Local Area Plans, Guidelines for Planning Authorities* (2013), the planning authority is requested to include:

- (i) a commitment to plan implementation and monitoring of the LAP; and
- (ii) key indicators that the planning authority will monitor over the life of the LAP for example – housing delivery, compact growth, land availability, housing / commercial vacancy etc.

## 8. Other Matters

The Office welcomes the inclusion of a separate chapter on built and natural heritage and the range of built heritage policy objectives outlined in section 8.2.

The Office's evaluation notes that archaeological remains were uncovered as part of recent public realm and regeneration works undertaken in the town.

In this regard, the Office advises the planning authority to consult with the National Monuments Service at the Department of Housing, Local Government and Heritage regarding the need to include additional policy objectives regarding the protection of archaeological heritage where groundworks are proposed.

### Summary

The Office requests that your authority addresses the recommendations and observations outlined above. As you are aware, the report of the chief executive of your authority prepared for the elected members under section 20 of the Act must summarise these recommendations and the manner in which they will be addressed. Where your authority decides not to comply with the recommendations of the Office, made in the draft LAP and report, please outline the reasons for the decision in the chief executive's report.

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 [plans@opr.ie](mailto:plans@opr.ie).

Is mise le meas,

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*AM O'Connor*

**Anne Marie O'Connor**

Deputy Regulator and Director of Plans Evaluations

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Submission by Office of the Planning Regulator

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