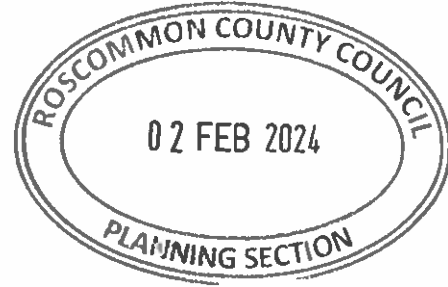




Our Ref: **FP2023-199**  
(Please quote in all related correspondence)

2 February 2024

'Roscommon Town Draft Local Area Plan',  
Forward Planning Section,  
Roscommon County Council,  
Aras an Chontae,  
Roscommon  
F42 VR98



Via email: [forwardplan@roscommoncoco.ie](mailto:forwardplan@roscommoncoco.ie)

Re: Notification under Section 20(3) of the Planning and Development Act 2000 (as amended)

**Re: Stage 1 Pre-draft phase of the Roscommon Town Local Area Plan 2024-2030**

A Chara

I refer to correspondence received in connection with the above.

Outlined below are heritage-related architectural heritage observations/recommendations of the Department co-ordinated by the Development Applications Unit under the stated headings.

### **Archaeology**

Roscommon Town is listed as Recorded Monument number RO 039-043--- (town) in the statutory Record of Monuments and Places, and is therefore subject to statutory protection in the Record of Monuments and Places, established under section 12 of the National Monuments (Amendment) Act 1994. A number of other Recorded Monuments are also located within the boundaries of the Local Area Plan. Roscommon Abbey is a National Monument in the ownership of the Minister for Housing, Local Government and Heritage.

Although built heritage features prominently in the draft Local Area Plan, specific objectives towards the treatment of archaeological structures, finds and features are not made. The Department therefore recommends the following additions to the draft text.

### **After this text in section 8.2 of the draft plan:**

'Other notable built heritage features include the former jailhouse overlooking Market Square, which accommodates a mix of commercial and residential uses. These and many



other landmark buildings provide an invaluable insight into the history and heritage of Roscommon town, dating back to the 13<sup>th</sup> century.'...

**Add the following text:**

'Recent archaeologically monitored groundworks for the Urban Renewal Scheme uncovered remains of the medieval town gate and portions of the town walls at Main Street, and wells at Market Square. These newly discovered features of the town's rich archaeological heritage, have been preserved *in situ*, contributing to the modern streetscape, and presenting tangible evidence of the rich archaeological potential lying just below street level throughout the town.'

**New built heritage policy objective RN 39:**

Ensure the protection of the archaeological heritage of Roscommon town through the safeguarding of upstanding archaeological remains. Developments proposing groundworks at any Recorded Monuments shown on the Record of Monuments and Places maps, or in zones of notification shown on the online Historic Environment Viewer of the National Monuments Service, should be preceded by archaeological impact assessment and carried out subject to appropriate archaeological mitigation.

**Architectural Heritage**

The Department welcomes the opportunity to contribute to the early stages of the plan making process.

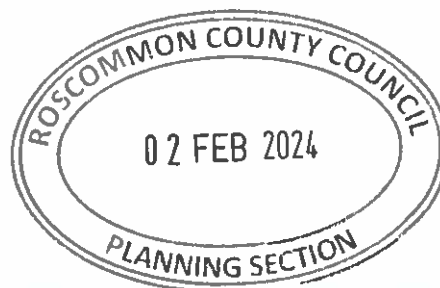
In preparation of a response, the Department has reviewed and had regard to the following plans:

1. Roscommon County Development Plan 2022-2028.
2. Roscommon Town Local Area Plan 2014-2020.

The Department acknowledges policies and objectives; BH 9.1 – BH 9.12, outlined in Chapter 9 *Built Heritage* and development standards; 12.7, 12.16, 12.17 and 12.23, Chapter 12 *Development Management Standards* of Roscommon County Development Plan (CPD) 2022-2028.

It is further noted that built heritage is referenced within other relevant areas of the CPD, including; Chapter 4: Towns and Villages, Chapter 6 Development and Design Standards pertaining to urban design, shopfronts, and the reuse of vernacular rural buildings.

For what pertains specifically to the '*Roscommon Town Local Area Plan – Pre-Draft Issues Paper*' the Department has the following high level observations and remains available for further and more detailed consultation as the statutory process continues:





**Statutory Guidelines and National Advice Series:**

'Architectural Heritage Protection: Guidelines for Planning Authorities' have been issued under Section 28 and 52 of the Planning and Development Act 2000 (as amended), and are available here<sup>1</sup> for consultation. These guidelines are a practical guide for Planning Authorities and for all others who must comply with Part IV of the Planning and Development Act 2000 (as amended) on the protection of the architectural heritage.

The Department has also produced a user-friendly Advice Series. These publications address a variety of technical topics relating to the built heritage. Topics of particular relevance to Planning Authorities may include energy efficiency, universal access and the conservation of historic ground surfaces. A full schedule of the publication titles and a URL are available in Appendix 1 of this document.

**Appropriate Title/Headings/Use of Phrases:**

In general, it is important to ensure a consistent set of terms and phrases are adopted, explained and applied throughout statutory plan/s. The interchangeable use of terms and phrases such as architectural heritage, built heritage, cultural heritage and built historic environment can cause confusion for the end user. The forthcoming Roscommon Town Local Area Plan should adopt a preferred term and ensure it is applied consistently throughout the plan as a whole.

In the case of *Roscommon County Development Plan 2022-2025* and in the *Roscommon Town Local Area Plan 2014-2020*, archaeology and archaeological objectives are found under the heading of 'Built Heritage'. Where this arises it is recommended that this is replaced with the heading 'Built and Archaeological Heritage'.

**Built Heritage Order within Plan:**

Built Heritage is generally dealt with in a standalone 'Heritage Chapter', and while this is considered appropriate, it would however be beneficial to consider grouping areas such as built heritage, place-making, town regeneration, urban regeneration or similar in a progressive order within the plan.

As these areas will have overlapping elements in terms of policies and objectives as well as development management standards, grouping them together will enable users and specifically non-technical users to fully understand the comprehensive requirements in respect of town centres, architectural conservation areas, protected structures and design standards for public spaces, streets, etc. and how they relate to each other.

**Policy and Objective Cohesion:**

It is vital to ensure that policies and objectives relating to the architectural/built heritage align with and support overlapping land use policies and objectives. This is of particular importance in regeneration areas/individual regeneration sites/opportunity sites/action plans or similar.

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<sup>1</sup> <https://www.gov.ie/en/publication/0937a-architectural-heritage-protection-guidelines-for-planning-authorities/>



Conflicting or unclear policies and objectives introduces varying levels of uncertainty which may disrupt the successful delivery of necessary and well-intended projects. It is therefore recommended that an assessment is undertaken to ensure cohesion between overlapping policies and objectives relating to architectural/built heritage and specified land uses.

In the case of zoning and land use descriptions/action plan objectives/town first policies/place-making objectives or similar make reference to the presence of protected structures and/or architectural conservation area designations as well as corresponding objectives and development management standards where relevant to a site.

**Policies, Objectives and Development Standards Consistency:**

Roscommon County Development Plan 2022-2028 has policies, objectives and development standards relating to built heritage most notably; BH 9.1 – BH 9.12, outlined in Chapter 9 *Built Heritage* and development standards; 12.7, 12.16, 12.17 and 12.23, Chapter 12 *Development Management Standards*. Roscommon Town Local Area Plan 2014-2020 also contains detailed policies and objectives most notably Policy 66-67, 71-75, Objectives 68-78 and Development Management Standards, 8.1 Design Guidance for Roscommon Town Architectural Conservation Areas (ACAs). The Department considers that the high standard of policies and objectives is maintained in the new Roscommon Town Local Area Plan. At the discretion of the Planning Authority there may be benefit in rationalising some of these policies and objectives to have a greater consistency and alignment with those contained within the County Development Plan.

The Design Guidance for Roscommon Town ACAs is considered to be a very positive and practical guide and should be reviewed and updated as necessary and incorporated into the future Roscommon Town Local Area Plan. It would be of benefit to expand it to mention public realm schemes within historic areas/ACAs, the application of utilities such as CCTV, satellite dishes, security alarms, vents and solar renewables. It would also be of significant benefit to refer to these guidelines in other corresponding policy areas such as climate action, urban regeneration, place-making, retail and telecommunications as and where relevant.

**Architectural Conservation Area Character Statements and Supporting Maps:**

The Roscommon County Development Plan 2022-2028, does provide a short generic paragraph relating to Architectural Conservation Areas. The Department recommends that Statements of Character are compiled for each Architectural Conservation Area within the functional area of the forthcoming Roscommon Town Local Area Plan

Statements of Character are an effective tool in assessing the historic environment, understanding its unique and authentic character and the significance and value of same. This in turn helps to inform and direct frameworks, policies and strategies for the delivery of other essential services such as public realm schemes, strategic infrastructure, addressing dereliction and vacancy, urban and rural regeneration and integrated land use solutions.



It is recommended that suitably qualified persons are involved in the preparation of the Statements of Character. For Local Authorities with Architectural Conservation Officers or similar such staff, they will be ideally placed to provide the necessary technical advice, policy analysis and development and operate in a collaborative manner to the benefit of the organisation. Where a Local Authority does not have in house expertise and/or capacity, they may need to seek the appointment of suitably qualified and experienced conservation consultants.

**Protected Structure & ACA Mapping:**

The current Roscommon Town Local Area Plan 2014-2020, contains three maps titled built heritage, these are Map 12a Built Heritage (RPS, NIAH, ACA, and RMP), 12b Built Heritage (RPS, NIAH and ACA) and 12c Built Heritage (RMP).

As Protected Structures and Architectural Conservation Areas are designated under the Planning and Development Act 2000 (as amended) it is recommended that protected structures and architectural conservation areas are presented on separate maps.

RMPs are archaeological sites and therefore should be presented on an individual map titled 'Archaeological Sites or Archaeological Heritage'.

The Local Authority can at their discretion provide an individual map illustrating buildings included in the National Inventory of the Architectural Heritage or refer to the relevant website.<sup>2</sup>

**Resources:**

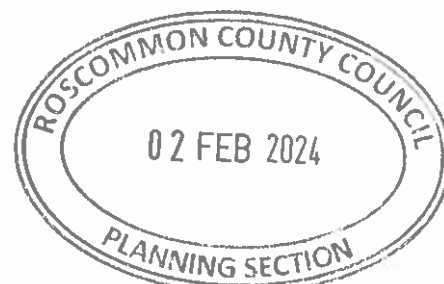
There are a number of architectural heritage resources and grants available to Local Authorities which are listed in Appendix 1 of this document.

The above observations/recommendations are based on the papers submitted to this Department on a pre-planning basis and are made without prejudice to any observations that the Minister may make in the context of any consultation arising on foot of any development application referred to the Minister, by the planning authority, in his role as statutory consultee under the Planning and Development Act, 2000, as amended.

You are requested to send any further communications to this Department's Development Applications Unit (DAU) at [manager.dau@npws.gov.ie](mailto:manager.dau@npws.gov.ie), or to the following address:

The Manager  
Development Applications Unit (DAU)  
Government Offices  
Newtown Road  
Wexford  
Y35 AP90

<sup>2</sup> [www.buildingsofireland.ie](http://www.buildingsofireland.ie)





Is mise, le meas

A handwritten signature in blue ink, which appears to read "Sinéad O'Brien", is written below the typed name.

Sinéad O' Brien  
Development Applications Unit  
Administration





### Appendix One: Useful Resources

#### Department of Housing, Local Government and Heritage Publications.

1. Architectural Heritage Protection Guidelines for Planning Authorities - <https://www.buildingsofireland.ie/>
2. A Living Tradition: A Strategy to Enhance the Understanding, Minding, and Handing on of Our Built Vernacular Heritage - <https://www.buildingsofireland.ie/search-vernacular-thatch-building-surveys/>
3. Department of Housing, Local Government and Heritage Advice Series - <https://www.buildingsofireland.ie/resources/>
  - Maintenance: A Guide to the Care of Older Buildings.
  - Windows: A Guide to the Repair of Historic Windows.
  - Roofs: A Guide to the Repair of Historic Roofs.
  - Thatch: A Guide to the Repair of Thatched Roofs.
  - Energy Efficiency in Traditional Buildings.
  - Bricks: A Guide to the Repair of Historic Brickwork.
  - Ironwork: The Repair of Wrought and Cast Iron Works.
  - Paving: The Conservation of Historic Ground Surfaces.
  - Access: Improving the Accessibility of Historic Building and Places.
  - Ruins: The Conservation and Repair of Masonry Ruins.
  - Disaster: A Guide to Prevention and Preparedness in the Historic Built Environment.
  - Places of Worship: The Conservation of Places of Worship.
4. Caring for our Vernacular Heritage - <https://www.buildingsofireland.ie/search-vernacular-thatch-building-surveys/>
5. Fire Safety in Thatched Properties – <https://www.buildingsofireland.ie/search-vernacular-thatch-building-surveys/>
6. National Inventory of the Architectural Heritage (NIAH) – <https://www.buildingsofireland.ie/>

The National Inventory of Architectural Heritage (NIAH) is a state initiative under the administration of the Department of Housing, Local Government and Heritage.

The purpose of the NIAH is to identify, record, and evaluate the post-1700 architectural heritage of Ireland, uniformly and consistently as an aid in the protection and conservation of the built heritage. The published surveys are a source of information on the selected structures for relevant Local Authorities. They are also an educational and research resource. It is hoped that the work of the NIAH will increase public awareness and appreciation of Ireland's architectural heritage.



7. Built Heritage and Climate Action Information Page and Resources –  
<https://www.gov.ie/en/publication/c2038-built-and-archaeological-heritage-climate-action/#climate-change-mitigation>

