



24 September 2024

Draft Direction Roscommon Town LAP,
Forward Planning Dept.,
Roscommon County Council
F42 VR98

Re: Roscommon Town LAP 24-30

Dear Sir,

We refer to your recent advertisement on the proposed draft direction (DD) for the above. We are acting on behalf of the landowners in part (i) of the DD.

There are two parts to the DD both located in the northeastern part of the town. Even though they are separated by a few hundred meters, in planning terms they are connected under the umbrella of compact development which not only promotes higher densities but also mixed-use development where there is proximity between where people can live and work. The two parts of the DD have other important similarities in that they are serviced with sewerage and the owners wish to see them developed. It is one of the tenets of sustainable development that you sweat your existing assets first, this is strongly espoused by UE. This tenet is not being accepted or followed in terms of this DD. There are at least two parcels of new residential lands in active agricultural use and the owners have every intention of continuing this use. This we presume would be well known to local councillors.

It is worthwhile comparing DD(i) with similarly zoned land to the south of the N60 and identified as plot 9 in the draft plan. This land has been zoned for this use for over 40 years and there has been very little new development. This land is also identified as having a Tier 1 status as regards services (including sewerage). This is wholly inaccurate, it is not serviced, the majority of it has no sewage network, UE in their submission agree. It is also identified by the CSO as being outside the Census 22 Town Boundary. Roscommon county council own some of this land. There is one further environmental factor in relation to this land which potentially constrains its development and that is it drains to a priority habitat an issue which was considered of immense concern to the council in development management matters. We would like to pose the question as to how this land could be considered more suitable for development than the DD(i) lands.



In the last 15 years there have been a series of large industrial projects constructed on serviced lands to the east of our clients' lands, we were the agents for a number of these and know there is sufficient water for supply and firefighting purposes and good interconnectivity with the water network on the N63. These are successful businesses, and the zoning and development of our client's lands as decided by the council would complement existing development. As part of the development management process the council have levied hundreds of thousands of euro some of it in special contributions to upgrade the road network in this area, this has yet to be completed. The LAP did not have a local transport plan associated with it carried out. This should have been done and it is plausible considering the above development history that an LTP would identify this area as being in need of upgrade and in need of public transport provision.

Our client's lands only ever flooded in 2009 following a period of intense rainfall, the River Jiggy as a result of no drainage maintenance and unauthorised culverting flooded our clients' lands, this has not recurred. In addition, the new N61 which is the main contributor to this tributary of the Jiggy has a sustainable drainage system which reduces the risk of flooding further.

We have examined the minutes of the MDC meeting held on 25/7/24 and wish to record our concern at the considerations given to publicly owned and privately owned lands which were each recommended to be de-zoned by the OPR. We refer in particular to publicly owned lands in Lisnamult and Hawthorn Drive. These parcels are peripheral in terms of the CSO boundary and the LAP boundary and each was still zoned by the council contrary to the OPR's recommendations. There is no DD in relation to these lands despite the problematic servicing of Lisnamult and the use of Hawthorn Drive for landfill. There appears on the face of it to be disparity in how public and private lands are considered by the council and the OPR.

The council is acting as a regulator and an operator simultaneously and it is very difficult to fairly balance the regulatory functions and the economic ambitions of the council. In terms of the Roscommon Town LAP our clients will be seriously disadvantaged economically unless the DD is changed. The decision of the council to zone our clients' lands is a better solution to the proper planning of the town. The DD proposes to omit only two parcels from all the changes democratically voted on by the councillors who seem to have grasped the imperative of having real development alternatives in their town plan. In the interests of fairness and transparency it would be right to accept all the changes made by the council with respect to OPR recommendations or alternatively to accept none. The outcome of giving preferential treatment to public land (some of it un-serviced) is contrary to proper planning.

There is one final point we wish to make, much is made of the fact in the OPR correspondence and the S31AO (5) report that no reasons were given by the council for deciding to zone lands in the case of DD(i) and (ii), however in concluding the meeting the minutes show that members were not alerted to the requirement to give their reasons for their decisions. This was an omission that should have been avoided.



The above submission taken on its merits gives a balance to the decision-making process that is absent heretofore and shows that the decisions of the council on 25/7/24 can be logically defended and meet the tests for proper planning and development. We would ask that this submission be forwarded in its entirety to the minister

Yours sincerely,

A handwritten signature in black ink, appearing to read "Eamon Collins".

Director

BEng(Hons) Eur Ing C.Eng FIEI