



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



Via online portal: [Roscommon Town LAP – Draft Ministerial Direction | Roscommon County Development Plan \(rosdevplan.ie\)](https://rosdevplan.ie)

24/09/2024

RE: DRAFT MINISTERIAL DIRECTION ON THE ROSCOMMON TOWN LOCAL AREA PLAN 2024-2030

A Chara,

I refer to your notification on 13 September 2024 of the Department of Housing, Local Government and Heritage's Notice of Intention to Issue a Direction to Roscommon County Council regarding the Roscommon Local Area Plan 2024-2030 and thank you for the opportunity to make this submission.

As is normal Assembly practice, the Elected Members of the Northern and Western Regional Assembly were (via the Executive) furnished with a Report / Assessment of the Draft Ministerial Direction on the Roscommon Town Local Area Plan 2024-2030 (copy attached).

The members at their monthly meeting on Friday 20 September 2024 decided not to endorse the Report of the Executive on the Draft Ministerial Direction.

I wish to thank Roscommon County Council for the opportunity given to provide this submission. If you have any queries in respect of the above, then do not hesitate to revert.

Mise le meas,

Gerard Doyle

Gerry Doyle
Assistant Director



REPORT: DRAFT MINISTERIAL DIRECTION ON THE ROSCOMMON LOCAL AREA PLAN 2024-2030

INTRODUCTION

The Roscommon Local Area Plan 2024-2030 (herein referred to as “the LAP”) was formally adopted by the Elected Members of the Roscommon Municipal District at their meeting on 25 July 2024. As required under Sections 31AO(5) of the Planning and Development Act, 2000 (as amended) the planning authority issued notification of the plan’s adoption to the Office of the Planning Regulator (OPR). The Chief Executive (Roscommon County Council) also informed the OPR of the decision of the planning authority not to comply with certain recommendations made in the relevant report of the OPR, together with reasons for the decision of the Authority. Having considered the recommendation made to the Minister by the Office of the Planning Regulator, the Minister of State for Local Government and Planning issued a ‘Notice of Intention to Issue a Direction’ to the Planning Authority under Section 31 of the Planning and Development Act, 2000 (As Amended) (‘the Act’). A copy of the draft Ministerial Direction and Statement of Reasons dated 4 September 2024 was sent to the Northern and Western Regional Assembly (herein referred to as “the Assembly”).

The draft Ministerial Direction is subject to a 2-week public consultation period which commenced on Friday 13 September 2024. The closing date for submissions is Friday 27 September 2024 (4pm) by post or on the dedicated Development Plan website: www.rosdevplan.ie

The Assembly made two previous submissions to the planning authority during the LAP plan-making process i.e. a submission on the draft LAP (dated 30 January 2024) and a submission on the proposed Material Alterations to the draft LAP (dated 6 June 2024). This report sets out the content of the draft Ministerial Direction and opinion of the Assembly from a regional perspective, taking into consideration the content of the Regional Spatial and Economic Strategy 2020-2032 and previous submissions made by the Assembly on the draft Plan.

THE DRAFT MINISTERIAL DIRECTION

The draft Ministerial Direction states that, following the review of a recommendation from the Office of the Planning Regulator (OPR), the Minister has decided to issue a draft Ministerial Direction to the planning authority. The Draft Direction sets out the following:

- (1) This Direction may be cited as the Planning and Development (Roscommon Town Local Area Plan 2024-2030) Direction 2024.
- (2) The Planning Authority is hereby directed to take the following steps with regard to the Local Area Plan:
 - (a) Delete the following Material Alterations from the adopted Local Area Plan such that the Local Area Plan boundary and subject lands revert to as indicated in the draft Local Area Plan:
 - (i) Material Amendment MA 45 – i.e. the Local Area Plan boundary (Map 1, Map 1a, Map 1b, Map 1c, Map 2 and Map 3) reverts to as indicated in the draft Local Area Plan, and the subject land to the north east at Roxborough reverts to not zoned and outside the Local Area Plan boundary, from Strategic Industrial / Enterprise Zones inside the Local Area Plan boundary;

and



(ii) Material Amendment MA 46 – i.e. the Local Area Plan boundary (Map 1, Map 1a, Map 1b, Map 1c, Map 2 and Map 3) reverts to as indicated in the draft Local Area Plan, and the subject land to the north east at The Walk and Cloonybeirne reverts to not zoned and outside the Local Area Plan boundary, from New Residential inside the Local Area Plan boundary,

and apply all necessary consequential updates to the text of the plan consistent with the foregoing.

A Statement of Reasons for the deletions is given in the draft Ministerial Direction as follows:

STATEMENT OF REASONS

I. The Local Area Plan includes a material alteration to extend the draft Local Area Plan boundary and zone additional New Residential land at The Walk and Cloonybeirne which is located in a peripheral and non-sequential location, the majority of which is located outside the CSO settlement boundary of Roscommon Town, inconsistent with the Strategic Objective and Policy Objective CS 2.10 of the County Development Plan for the future growth and development of Roscommon Town to ensure that growth occurs in a sustainable and sequential manner while prioritising a low carbon, compact, consolidated and connected pattern of development, and with Policy Objectives CS 2.5 and TV 4.18 of the County Development Plan for the compact growth of Roscommon Town and to support the regeneration of the town centre and brownfield/infill lands and the consolidation of the urban area, and with objectives RPO 3.1 and RPO 3.2 of the RSES for compact growth, and fails to have regard to the policy and objective for the sequential approach to zoning under section 6.2.3 of the Development Plans, Guidelines for Planning Authorities (2022) (the Development Plans Guidelines).

II. The Local Area Plan includes a material alteration to revise the draft Local Area Plan boundary and zone additional land as Strategic Industrial / Enterprise Zones at Roxborough, which is located in a peripheral, non-sequential and unserviced location outside the CSO settlement boundary and Local Area Plan boundary for Roscommon Town. The material alteration is therefore inconsistent with the Strategic Objective and Policy Objective CS 2.10 of the County Development Plan for the future growth and development of Roscommon Town to ensure that growth occurs in a sustainable and sequential manner while prioritising a low carbon, compact, consolidated and connected pattern of development, and with Policy Objective CAEE 8.18 of the County Development Plan to ensure that land use and transport infrastructure are integrated to develop more sustainable settlements and is not made, in so far as possible, in a manner consistent with *inter alia* the Climate Action Plan 2024 and the achievement of the GHG emissions reduction targets of the Climate Action and Low Carbon Development Act 2015, as amended, and fails to have regard to section 6.2.5 of the Development Plans Guidelines that the evidence and rationale underpinning the zoning of land for employment purposes must be clear and strategic in nature, and fails to consider the sequential test and accessibility under section 1.4 of Appendix A of the Development Plans Guidelines.

III. The Local Area Plan has not been made in a manner consistent with, and has failed to implement, recommendations of the Office of the Planning Regulator made under section 31AO of the Act.

IV. The Minister is of the opinion that the Local Area Plan as made is inconsistent with the objectives of the Development Plan of the area, which is a requirement of section 19(2) of the Act.

V. The Minister is of the opinion that the Local Area Plan as made is not consistent with the objectives of the RSES, contrary to section 19(2) and section 27(1) of the Act.



VI. The Minister is of the opinion that the Local Area Plan as made is not consistent with National Policy Objectives 11 and 33 of the National Planning Framework.

VII. The Minister is of the opinion that the Local Area Plan as made fails to set out an overall strategy for the proper planning and sustainable development of the area.

VIII. The Local Area Plan is not in compliance with the requirements of the Act.

ASSESSMENT OF THE DRAFT MINISTERIAL DIRECTION

Having assessed the draft Ministerial Direction, the Assembly notes that there are two areas for consideration:

New Residential land at The Walk and Cloonybeirne (Appendix 1)

Strategic Industrial / Enterprise Zones at Roxborough (Appendix 1)

The Assembly in its submission on the proposed Material Alterations (dated 06/06/2024), recommended that the two Material Amendments referred to in the draft Ministerial Direction (i.e. MA 45 and MA 46) not be made or be amended. Relevant extracts from the Assembly submission are as follows (in *italics*) and a map identifying the affected land is contained in Appendix 1 of this document.

MA 45

The land northeast of the town with proposed zoning as Strategic Industrial / Enterprise Zones (MA 45) is standalone and partially located in Flood Zone A. The local authority has estimated that 28 hectares of undeveloped lands are available for industrial / enterprise. Therefore, it is considered that the inclusion of these lands in the LAP is not justified and should not be included.

In order to comply with RPO 3.10ⁱ RPO 3.11ⁱⁱ of the RSES it is recommended that material amendments MA 43 and MA 45 are not made, as both parcels of land have been identified as being in/partially in Flood Zone A.

MA 46

There is archaeology on land with proposed zoning as New Residential northeast of the town (MA 46) and it may be appropriate to amend this to exclude the area of the archaeological feature and any zone of influence at this location from the residential zoning.

There is a Recorded Monument on land with proposed zoning as New Residential northeast of the town (MA 46) and it is recommended that it would be appropriate to further amend this proposed material alteration to exclude the area of the archaeological feature and any zone of influence at this location from the residential zoning and to update the Land Use Zoning Extent table and New Residential Lands table accordingly.

The Assembly's position on the matter has not changed. While the reasons for not supporting the proposed material amendments (in full or part) are different, in pursuit of compact and sustainable urban growth in Roscommon town, designated as a Key Town and Key Destination Town in Ireland's



Hidden Heartlands in the RSES, the Assembly supports the draft Ministerial Direction as it aligns with the principles and RPOs, in particular RPO 3.1 and RPO 3.2 of the RSES.

CONCLUSION

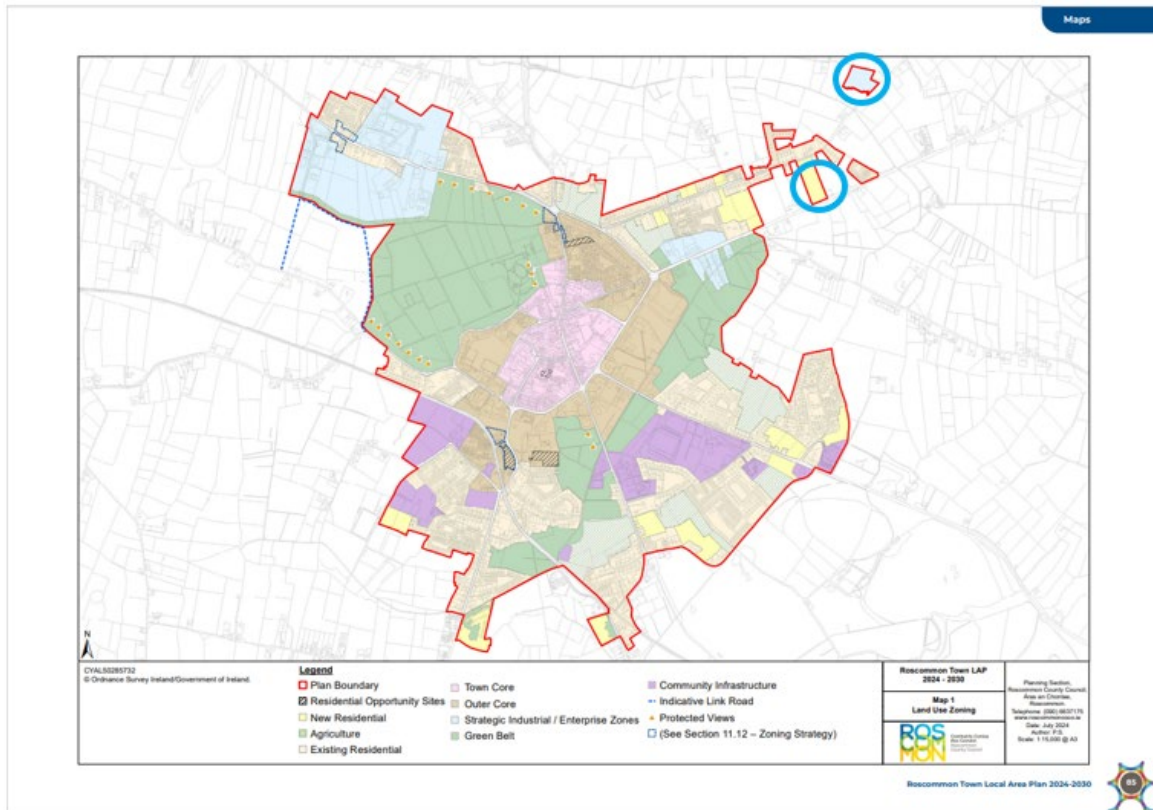
In conclusion, the Assembly supports the draft Ministerial Direction. This will strengthen compliance of the Roscommon Town Local Area Plan 2024-2030 with the Regional Spatial and Economic Strategy for the Northern and Western Region 2020-2032.



APPENDIX 1:

LAND AFFECTED BY THE DRAFT MINISTERIAL DIRECTION CIRCLED IN BLUE

(Background map source: Roscommon Town LAP 2024-2030 [Roscommon Town LAP Stage 3 - Amendments | Roscommon County Development Plan \(rosdevplan.ie\)](#))



Rialtas na hÉireann
Government of Ireland



Cómhaoinithe ag an
Aontas Eorpach
Co-funded by the
European Union

Northern & Western Regional Assembly
The Square, Ballaghaderreen, Co. Roscommon
Tionól Réigiúnach an Túaiscirt agus an Iarthair
An Chearnóg, Bealach an Doirin, Co. RosComáin
Tel: +353 (0)94 9862970
Email: info@nwra.ie