



Forward Planning Section
The Planning Department
Roscommon County Council
Áras an Chontae
Roscommon
F42 VR98

27th September 2024

Dear Sir/Madam

Re: Submission to Draft Direction to the Roscommon Town Local Area Plan 2024-2030

Roscommon County Council recently adopted the Roscommon Town Local Area Plan 2024-2030. The plan as adopted is an imaginative and forward-looking plan that will guide the future development of the town and ensure it can grow in a sustainable manner. The adoption of the plan followed lengthy public consultation and extensive local debate and in my opinion is a sound basis for the future growth and development of the town.

I was greatly disappointed therefore to read the Recommendations from the Planning Regulator (OPR) dated 21st August, and the subsequent *Notice of Intention to Issue a Direction* issued by the Minister of State directing the decision made by the democratically elected members to zone my land be reversed. On foot of the Recommendation of the OPR the Minister of State is requesting the Council to de-zone my land (Material Amendment MA 46: lands to the northeast at The Walk and Cloonybeirne to revert to not zoned and outside the Local Area Plan settlement boundary from New Residential inside the Local Area Plan boundary).

I note from the OPR's website that his justifications for his Recommendations are that the decision to zone land such as mine through the Material Amendment process is not consistent with 'evidence-based' plan making.

I respectfully suggest that the Planning Regulator is mistaken.

The Roscommon Town Local Area Plan was made in accordance with Sections 18-20 of the Planning and Development Act 2000 as amended. This requires the LAP to be consistent with the County Development Plan which in this case is the Roscommon County Development Plan 2022-2028.

This Plan in turn was made in accordance with the Act and with the National Planning Framework which requires a Housing Needs Demand Assessment (HNDA). The HNDA appended to the County Development Plan was prepared in 2021 by Deloitte in accordance with the guidelines issued by the Minister.

This is all well and good. The County Council followed all of the correct procedures in the preparation and adoption of both the County Development Plan 2022-2028 and the Roscommon Town Local Area Plan 2024 -2030.

However, I would like to remind the Planning Authority also of its obligations under S95(1)(a) of the Planning and Development Act which states;

95.—(1) (a) *In conjunction with the inclusion of the housing strategy in its development plan, a planning authority shall, having regard to the overall strategy for the proper planning and sustainable development of the area of the development plan referred to in section 10, ensure that sufficient and suitable land is zoned for residential use, or for a mixture of residential and other uses, to meet the requirements of the housing strategy and to ensure that a scarcity of such land does not occur at any time during the period of the development plan.*

The legislation clearly and unambiguously states that the Planning Authority is legally obliged to ensure that there is sufficient lands zoned in the county to meet the future housing needs of the population of the county.

The evidence presented in the HNDA (prepared in 2021) is based on ESRI population projections which seriously underestimated population growth in the country.

Year	Population Total	Source	Percentage Increase	Annual Population Increase	Total Population Increase 2016 - 2027
2006	58,768	Census	-		
2011	64,065	Census	9.01%		
2016	64,544	Census	0.75%		
2017	65,240		1.08%	696	
2018	65,936		1.07%	696	
2019	66,632		1.06%	696	
2020	67,328		1.04%	696	
2021	68,053		1.08%	725	
2022	68,795		1.09%	742	
2023	69,505		1.03%	710	
2024	70,185		0.98%	680	
2025	70,850		0.95%	665	
2026	71,500	NPF Projected	0.92%	650	
2027	72,100		0.84%	600	7,556
2028	72,700		0.83%	600	
2029	73,300		0.83%	600	
2030	73,900		0.82%	600	
2031	74,500	NPF Projected	0.81%	600	

Table 4.4: Projected population growth in County Roscommon



Table 4.4 of the HNDA (above) estimated the population of the county would be 68,795 persons in 2022. It estimated the population growth from 2016 to 2022 would be around 1% per annum on average.

In fact, the population of the county, as recorded in the 2022 census, was 70,259 persons. The population of the county grew at an average rate of 1.4% per annum during this period. For Roscommon Town, the recorded population of the town in 2022 was 6,555 persons, a growth rate of 1.7% per annum over the 6-year intercensal period.

The decision by the Elected Members to zone my land was based on their local knowledge of the housing crisis on the ground in Roscommon Town and the recent explosive growth in population evidenced in the 2022 census results.

The preparation of the Roscommon Local Area Plan 2024-2028 was an opportunity to update population projections and the housing requirements for the Key Town of Roscommon in the light of the new evidence presented by the 2022 census and I believe the Office of the Planning Regulator should have been calling for this. Instead, he chose to ignore the evidence and continue to base his criticisms and recommendations on discredited population projections that are now six years out of date. I therefore submit that the Recommendation of the OPR is not consistent with 'evidence-based planning'.

Furthermore, the OPR is mistaken when he states that 'the majority of the site is outside the CSO settlement boundary'. The OPR will be aware that current national planning policy is to encourage compact growth. National Policy Objective 7 of the draft Revised National Planning Framework is to;

National Policy Objective 7

Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements and ensure compact and sequential patterns of growth.¹²

Footnote 12 explains;

This objective relates to all 'built up areas' as defined by CSO. For the purposes of NPO 7, 8 and 9 the built-up footprint is defined as the area given over to urban land uses (i.e. artificial surfaces relating to urban land uses). The built-up footprint shall be clearly defined for each settlement on the land-use zoning map as part of the statutory plan making process.

Below is the Built-Up Area for Roscommon Town as defined by the CSO and Tailte Eireann.

<https://data-osi.opendata.arcgis.com/datasets/osi::cso-urban-areas-national-statistical-boundaries-2022-ungeneralised/explore?location=53.626069%2C-8.174762%2C13.93>

My lands are outlined in red. They are clearly 100% within the Roscommon Town Urban Area.



Surveying Open Data Portal

CSO Urban Areas - National Statistical Boundaries - 2022 - Ungeneralised

Taiite Eireann MapGenie
Taiite Eireann

Summary

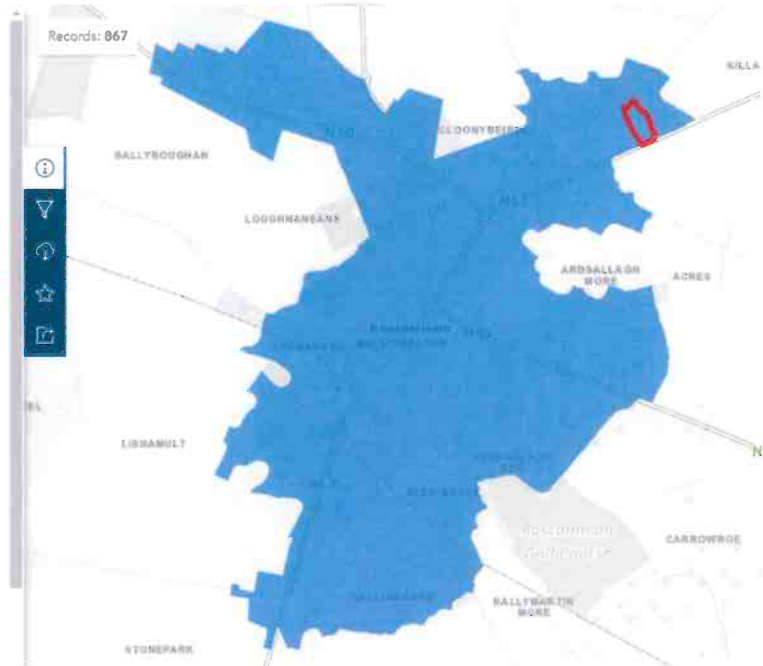
CSO Urban Areas - National Statistical Boundaries - 2022 - Ungeneralised

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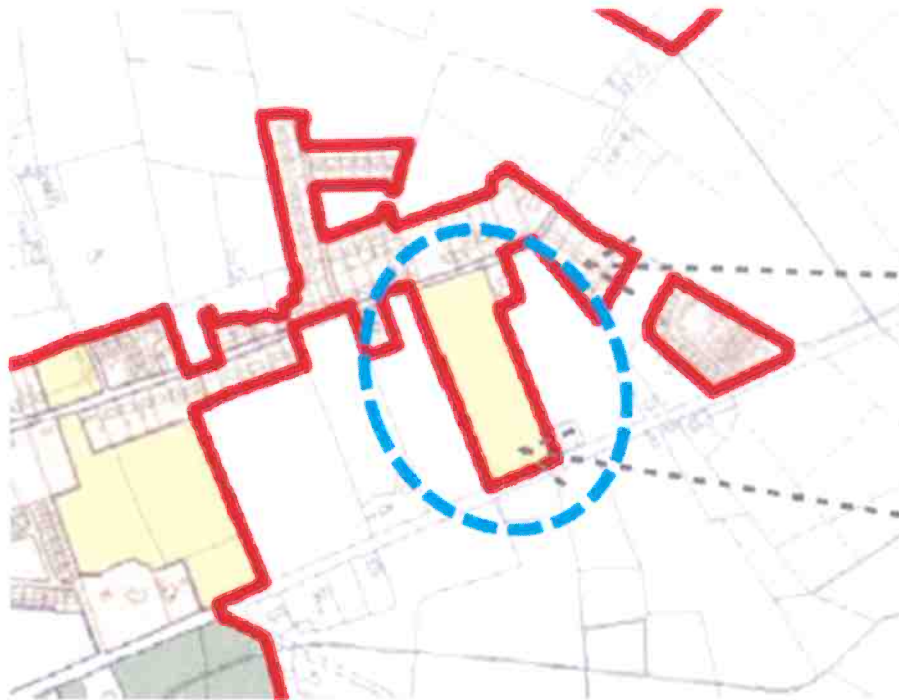
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Details

-  **Dataset**
Feature-Layer
-  **30 January 2024**
Info Updated
-  **13 June 2023**
Data Updated
-  **16 June 2023**
Published Date
-  **Records: 867**
[View data table](#)



Material Alterations: New Residential



I accept that there is unzoned land to the west of my land between my land and the next field zoned for New Residential Development. While these lands are not mine, and not my business, if the Planning Authority is concerned about development happening out of sequence, I believe the logical thing to do is to zone these lands also for New Residential development.

The National Planning Framework (NPF) is currently in the process of being reviewed in the light of the exceptionally high population growth rates the country continues to experience. This review is likely to lead to a requirement for all Planning Authorities to update their Core Strategies and HNDAs to reflect this growth.

The draft Revised NPF continues to support a rebalancing of growth away from the Eastern and Midlands Region and towards the Northern and Western Region and I fully support this. Allowing towns like Roscommon Town to grow at their natural rate, unhindered by artificial constraints imposed by rigid interpretation of out-of-date data, is entirely consistent with this national planning policy.

The OPR notes that my land was unzoned in the Roscommon Local Area Plan 2014-2020 and implies that this is a good reason for not zoning it now. He ignores the fact that I had planning permission (06/600) on the land in 2006 and was unable to build it out because of the recession. This is contrast to many other fields in the town which have been zoned for many years but where the landowner has chosen not to develop.

While I understand that sequential development is good in theory, in reality if landowners are unwilling or unable to develop their land, even if its zoned, then no development will happen, house prices will continue to increase due to the artificial restriction of zoned serviced land and the Housing Crisis will continue to worsen.

If zoned, I fully intend to develop my land and am open to selling to a private developer, an Approved Housing Body or, indeed to the Council itself.

I therefore respectfully suggest that the Recommendation of the OPR to de-zone my land is not consistent with evidence-based planning insofar as it's based on out-of-date data, is mistaken in its assertion that my land is outside the Built Up Area for Roscommon Town, and is contrary to the proper planning and sustainable development of Roscommon Town and I ask the Planning Authority to reject this Draft Direction

Yours sincerely

Seamus Hayden

