



02 February 2024

FAO Brian Farragher
Roscommon County Council
Aras an Chontae
Roscommon
F42 VR98

Re: Draft Roscommon Town Local Area Plan 2024-2030

Dear Sir/Madam

The Heritage Council is a prescribed body under S.I. No. 600/2001 of the Planning and Development Regulations, section 28 inter alia. We seek to provide submissions on forward planning, development control and strategic infrastructure developments as they relate to Ireland's heritage, both cultural and natural. We welcome the opportunity to comment on the Draft *Roscommon Town Local Area Plan 2024-2030*. Our comments will deal with both built/ cultural heritage and natural heritage, as the matters appear in the LAP.

General Note

The Heritage Council strongly supports the commitment in this LAP to "harness" the unique heritage of Roscommon town as part of the overall strategy. This is key, economically successful towns have few derelict buildings, and have an attractive public realm that amplifies the setting of the town's heritage assets.

Opportunity Areas are rightly identified, and the rationale is valid. However, the first step in considering opportunity sites, and their development potential, is to identify the heritage and ecological assets on, or adjacent to the site. This should then inform the approach to site design. This is not done in the description of opportunity sites, granted that on occasion no assets are present.

Strategic Environmental Assessment

There are some questions as to the detailed evaluation (section 8.7) and its methodology. It is not immediately clear if each objective policy was assessed individually. The detailed evaluation appears to assess the policies and objectives against the SEA objectives, not individually but rather aggregated together by section e.g. "8.7.4 Economic Development". There is concern regarding the soundness of this method. An SEA is an iterative process whereby each policy should be assessed against the SEA objectives and should then be refined accordingly, depending on the results. It is highly unlikely that every policy objective under a chapter/section heading has the same impact on the SEA objectives. Whilst the assessment in its commentary may not necessarily be wrong, this methodology cannot be supported.

It is also not clear in the detailed evaluation how any section of the LAP can be assessed as "Likely to Improve status of" of *Biodiversity, Flora and Fauna* and at the

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same time “have a potential conflict with” it. This occurs for several SEA objectives in the detailed assessment. It may be symptomatic of the approach to assessing the section in its entirety rather than by individual policies. It needs to be revisited. It is also unlikely that the economic development objectives, or some of the policies for housing and population can truly be mitigated, in any meaningful way. The assessment currently determines that none of the sections of the LAP have a probable conflict with SEOs. This is unlikely to be the case.

Chapter 3 Strategic Development Strategy.

We welcome the focus on compact growth and the recognition of the potential of centralised urban locations to facilitate homes. This will invariably mean greater attention on reusing existing buildings in town centre locations which will bring benefits to the historic environment. The ambition to harness the heritage of Roscommon Town is supported, although a strategic objective is also needed that incorporates the natural heritage of the town.

The Heritage Council also welcomes the commitment to further public realm improvements. Car dominated urban cores and associated infrastructure undermine the perception and experience of the historic environment. Removing car parking in favour of public realm improvements also aids the setting of historic buildings. This should be actively promoted in the inner urban area.

Chapter 4 Population, Housing and Compact Growth

Policies RN4, RN5 and RN7 are well proposed policies and are supported. With regards to Policy RN1, the LAP should take the opportunity to bring forward the correctly identified statement from the CDP regarding management standards – i.e. the reduction of car parking provision in town centre locations. Compact growth and town centre regeneration should not be compromised by either excessive car parking standards or residential amenity standards when considering new build developments. The latter will also be important for Policy RN6.

Chapter 5 – Town Centre and Regeneration

Policies RN9 to RN17 contain commendable objectives and are welcomed. However, it is unfortunate that the strong heritage emphasis identified in the overall strategic objective has been lost over these nine objectives. It is essential that this is carried through and some emphasis on heritage led town centre regeneration should be integrated here. In addition, it is not clear why there are no placemaking specific policies in the placemaking section of this chapter.

Opportunity Site 3 – Henry Street South – Infill Site – On balance it may be more sustainable to develop this site, however some form of ecological survey work is required. It would be useful if the Council’s ecologist/biodiversity officer appraise this site, as there certainly are habitats present. Should development be considered, needless removal of trees and hedgerows should be prevented – an ecologically sensitive led design to the scheme is possible here. In addition, the existing wall along Henry Street has strong character and should be retained as far as practical.

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Opportunity Site 4 – Castle Lane. This is an example where the heritage assets should be identified as part of the opportunity site description. The designed landscape avenue to the west of the site is listed on the Sites and Monuments Record – this is laid out to provide views on approach to the castle. This avenue should be carefully integrated into any site layout design. In addition, there is significant vegetation cover and mature trees present. The site should be appraised by the council's biodiversity officer/ecologist, and existing trees and hedgerows should be incorporated into the design of the scheme.

Opportunity Site 5 – Castle Street. The architectural approach identified is commended, yet there are mature trees on this site, therefore this should be incorporated into the design of the scheme.

Opportunity Area 6 – Development Site at Abbey Town. Strong support for the identification of this site, particularly given its location next to the train station. There is a need to bear in mind the integrity of the protected structures associated with the train station.

Opportunity Site 7 – The Spinney. There are architectural fragments identified on the Sites and Monuments Record on this site, while there are also strong linear hedgerows which provide a well-defined perimeter to the site. The location is a sustainable one, yet there is needed to retain both the ecological and cultural heritage features as part of any design. Similarly, an appraisal by the council's biodiversity officer would be useful here.

Chapter 7 – Infrastructure and Transport

There is a need to identify greater specificity here regarding departures from CDP car parking standards (for new units or conversion of existing buildings). The objectives are vague (repeating national or CDP policy) and there is a need to ensure that excessive parking expectations do not compromise reuse of buildings, or the development of well-located sites in the town.

While encouraging cycling requires two things, 1. safety during the journey and 2. secure storage at both ends of the journey. Refer to CDP development management standards, if necessary, especially the cycling parking expectations. While promoting cycling is naturally supported, there needs to be more tangible plans detailed at local plan level i.e. new lanes/routes/ how many kilometres of cycle ways envisaged? Some greater linkages could be made with regard to the transport policies and the most likely locations for development, in terms of planning new cycling routes. This is imperative to provide alternatives to the car, therefore reducing GHG emissions, thus reducing climate change impacts on habitats and ecosystems.

Chapter 8 – Built and Natural Heritage

A stronger sense of the evolution of Roscommon as a historic settlement from the pre-Norman period, the medieval settlement with its castle, and abbey and its later redevelopment, should be conveyed. The castle and the abbey give the town a marked

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time depth, along with the built heritage from more recent centuries. The Zone of Archaeological Potential and the Architectural Conservation Area (ACA) indicate this importance.

Whilst acknowledging that this LAP relates to Roscommon town, we point out that there are a number of large and impressive medieval masonry castles in Co Roscommon, at Rindoon, Roscommon and Ballintubber. Greater linkages could be made to all three of these monuments so as to keep visitors in Co Roscommon, by means such as developing a trail, and by negotiating access and conservation strategies.

Policies RN31 to RN38 are commended and supported, although the protection of historic shopfronts, and encouraging 'conservation through use' could be included in these objectives. We note policy RN36 on the re-use of vernacular buildings and we point out that the Heritage Council awarded €279,105 for this purpose in Roscommon town during 2020-21. Policies and further programmes to build on this spend are to be welcomed.

Whilst we welcome policies that ensure that hedgerows will be planted with native species, there is a need in the first instance to protect existing hedgerows and treelines, which should be retained as part of the design of schemes, where it is feasible to do so. There can be needless loss of hedgerows to 'tidy' a site prior to construction works, whereby old mature trees are felled, with new planting taking several years to bring any amenity value to the newly created built environment. Whilst it is recognised that the removal of vegetation is required to facilitate access and development/building footprints, greater interrogation should be given to site design when considering the removal of existing natural features.

The Heritage Council would also encourage active TPO work in the form of a fresh 'walk about town' simple assessment of trees of important ecological and character value with the view to identify further TPOs.

Chapter 9 Climate Action and Flood Risk Management

Some of the objectives in this section regarding biodiversity/ green infrastructure may be more suited to chapter 8. For example, part (a) of Policy RN48 and RN49 are strongly supported and go some way to meeting our earlier comments on natural heritage.

Chapter 11 Land Use Zoning

The zoning strategy should identify 'green infrastructure networks' alongside greenbelt. Biodiversity in and around settlements is largely dependent on hedgerows, existing trees, and linear features such as public parks, railway sidings or waterways. Connecting existing habitats from within the built environment, along these pathways, to the agriculture zoned lands on the outskirts of the town will be of significant benefit to natural heritage. Visual expression in a zoning map would be beneficial here.

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I trust these comments will be considered carefully as Roscommon County Council progresses the Roscommon Town Local Area Plan 2024-2030.

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