

OPR Planning Review of Roscommon County Council



**Oifig an
Rialaitheora Pleanála**
Office of the
Planning Regulator

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Comhairle Contae
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1

Introduction



Background

Planning has a fundamental role in the transition to a low carbon future, including through adapting to and mitigating against flood risk, developing indigenous renewable energy resources, ensuring that development supports more sustainable transport options and encouraging more effective use of brownfield sites over greenfield land. Planning should set out a cohesive vision for the future of Ireland. The role of the OPR is to ensure that local authorities support and implement this vision.

Chapter IV ('Review of Planning Functions') of Part IIB of the Planning & Development Act 2000, as amended, ('the Act'), in particular, section 31AS gives the OPR the discretion to conduct reviews of the systems and procedures used by local authorities to deliver their planning functions. These provisions give a basis for overseeing the delivery of planning services to the public and to ensure the integrity of the institutional arrangements behind the national planning system.

The Planning & Development Act 2024 was progressing through the Oireachtas while this review was being conducted and it can be expected that various provisions will be implemented throughout the course of 2025. Accordingly, the references made in this report are based on the operating legislation at the time of the review.

As committed to in our Strategy Statement, the OPR is conducting local authority planning reviews on the basis of a rolling programme, whereby each authority will, in turn, benefit from having the Office look at how planning services are delivered. While this may result in performance improvement recommendations for the authority being reviewed, this also allows the OPR to monitor the operation of the overall local authority planning sector and to identify areas for shared learning across all 31 local authorities.

An OPR review is improvement-focussed, designed to complement and add value to the local authority's own performance and improvement plans. The programme is designed as a developmental resource for the planning system, with recommendations arising from the process designed to enhance the delivery of services to the public. The overall intention is to embed a culture of continuous improvement in the Irish planning sector.

Scope

Reviews are conducted in accordance with section 31AS of the Act and on this basis, the emphasis is on the systems and procedures being used by a local authority to deliver its planning functions. In this regard, the review process is concerned with current operations rather than focussing on historical matters.

While the findings of this review draw upon knowledge available to the OPR in the delivery of our broad statutory remit, as well as published statistics, this report principally reflects the information presented by Roscommon County Council to the OPR during the review process.

Process

The undertaking of any individual review is a comprehensive process, involving significant information gathering exercises, analysis and engagement with planning officials to fully appraise the systems and procedures used to deliver planning functions.

The review formally initiated in May 2024, involved extensive engagement with the planning department over a number of months. This included a workplace survey of planning department staff and a series of workshop-style meetings in the Council's offices with senior management and staff from across the

planning Following the publication of the review, the OPR engages in a two-year monitoring process with the Council to ensure that recommendations made are addressed.

At the time of the review, the Planning and Development Bill 2023 was being progressed. If necessary, the OPR will discuss the impact of the revised legislation with the Council as part of the implementation and monitoring phase of the OPR's review process.

The OPR wish to thank Roscommon County Council for facilitating open engagement throughout the review process and to acknowledge the input of the Council's planning department staff, who provided generous access and valuable insights.

Ratings and Recommendations

The reviews programme does not set out to create a league table of local authorities with regard to performance. Nevertheless, it is important that the review process assesses the performance of the planning department in the delivery of their statutory functions, as well as the overall organisation and governance of the planning department and its engagement with the public. In this regard, the OPR will apply a broad rating in respect of the systems and procedures across the key operational processes in planning service delivery.

The ratings are defined as follows:

- **Satisfactory:** where it has been demonstrated that the systems and procedures are adequate to effectively deliver the statutory function on an ongoing basis and to meet key business objectives.
- **Unsatisfactory:** insufficient evidence has been provided that appropriate systems and procedures are in place, thereby creating an unacceptable weakness with regard to the ability to adequately deliver the statutory function and to meet key business objectives.

The ratings and recommendations are provided to encourage the ongoing improvement of robust procedures in relation to statutory functions and collectively evaluate the effectiveness and efficiency of the delivery of the local authorities planning services.

Regardless of the rating applied, recommendations may be made as part of the review indicating how systems for delivering operational processes could be improved or how current standards may be maintained. A collated list of recommendations made in this report is provided in Appendix 1. These recommendations are also graded by the level of priority that should be assigned to them by the Council, as follows:

- **Critical:** immediate implementation of the recommendation is required to resolve a critical weakness which may be impacting the delivery of statutory functions.
- **High:** the recommendation should be addressed urgently to ensure that the identified weakness does not lead to a failure to deliver on statutory requirements.
- **Medium:** the recommendation should be considered in the short-term with a view to enhancing the effectiveness of service delivery.
- **Low:** the recommendation relates to an improvement which would address a minor weakness and should be addressed over time.
- **Advisory:** the recommendation does not have a serious impact for internal systems and procedures but could have a moderate impact upon operations. On this basis, the recommendation should be considered for implementation on a self-assessed basis.



2 Overview of Key Findings



As previous OPR review reports have recognised, local authority planning departments operate under significant pressures, being required to provide customer-driven services while also being expected to prioritise the implementation of a broad range of national, regional and local policies and programmes. The work carried out in planning departments is complex and demanding, with decisions and policies being open to political, legal, media and public scrutiny.

At the time the OPR was conducting the review process, Roscommon County Council's planning department was operating on the basis of 25.5 designated full time equivalent positions. This is a limited staffing allocation for a function of such strategic importance and consequently it could be expected that staff would be under significant pressure to deliver the required services.

The current resourcing situation is a clear risk to the Council, one that is affecting its ability to deliver services to the level expected. Effective resourcing is also central to enabling the planning department to play the strategic and coordinating role it should be fulfilling. Further, the adequate resourcing of any workplace is a key factor influencing staff retention and, in turn, in creating a stable and attractive environment that new staff might be drawn to in a tight labour market.

It is a clear finding of this review that the resourcing of the planning department requires attention. Resourcing inputs are required to ensure that statutory planning responsibilities are adequately fulfilled, but also to ensure a stronger positioning of the department within the overall local authority structure where development promotion is more clearly linked to the regulatory aspects of planning.

Capacity therefore has to be built within the planning department and that needs to start with the allocation of additional resources to support current efforts. While clearly the Council would benefit from securing additional planning expertise, there is a wider case in relation to building expertise, capability and procedural efficiency across the department, as well as between the department and other operational areas of the Council. This fundamental issue runs throughout all of the OPR recommendations.

Notwithstanding the above, the role played by the existing teams within the planning department must be acknowledged. In the face of challenging circumstances, it is clear that the effort of dedicated and experienced individuals has been vital in delivering the duties of the planning department. It is also apparent that what is being asked of individuals to date is unsustainable in the long-term, and that effectively operating in an ongoing crisis management mode is having an effect on morale.

Addressing the department's capacity issues is not as simple an issue as creating additional sanctions for planner positions. The Council also has a problem in filling and maintaining the currently designated planner roles. Consequently, while the resourcing issue must be addressed, it is also crucial that the planning department makes more efficient and effective use of the limited resources that are currently available. Accordingly, the recommendations set out in this report identify some of the key areas where procedures can be adapted to create greater stability, ensure more focussed levels of prioritisation, and appropriate delegation, and mitigate against the risks associated with the volume of firefighting currently at play.

Improvements in its approach to how tasks are organised and managed will be essential in ensuring the department's sustainability in the longer-term as a positive place in which to work and where services are delivered effectively and efficiently. This will require a stronger focus on business planning and management, internal communications, and the integration of learning and development into day-to-day business. In essence, the recommendations made in this report are designed to ensure that staff working

in the planning department can achieve job satisfaction and maintain the levels of resilience already on display.

Plan-Led Development

This review found that the Council generally has satisfactory systems and procedures in place to deliver its forward planning function. However, as already noted, the availability of appropriate resources to maintain the quality of the forward planning function will be crucial. While the strain on resources is obvious across the department, there are clear limitations with respect to the Council's capacity to take on simultaneous forward planning projects.

Over the coming period, there are a number of statutory forward planning projects that are to be delivered, notably the implementation of the Roscommon Town Local Area Plan, and working with other authorities to produce joint plans for Carrick-on-Shannon and Athlone. It is also expected that a comprehensive forward planning implementation and monitoring framework will be developed.

At present, one of the more significant planning issues in the county is the significant gap between the annual housing delivery target for County Roscommon (approximately 400 homes) under the National Planning Framework and construction on the ground. In this regard, planning permissions for just over 150 homes were granted during 2023.

While the achievement of housing delivery targets is largely dependent on the development sector it is vital that the Council does everything in its power to encourage the delivery of multi-unit residential developments and to co-ordinate the various land activation tools available. It is in this regard that the review recommends a greater empowerment of the planning department so that it can take a more strategic role in the monitoring, assessment, design and implementation of initiatives in relation to land activation, housing delivery and compact growth.

While this report's emphasis on building capacity in the planning department is rooted in the necessity that essential services and legislative requirements are delivered successfully, it is also important that the planning department transcends its crisis management mode to fulfil a more strategic development promotion role for Roscommon. In this regard, there is an opportunity for the department to be positioned to take a more proactive and strategic leadership role in delivering sustainable communities and driving urban renewal and economic growth and the oversight of Part 8 projects.

In this regard, the Council should ensure that the planning department is given a greater mandate to drive collaboration across the Council to generate synergy between the various developmental tools at the Council's disposal. This would include the department playing a more strategic leadership role in relation to the innovation, implementation and oversight of the Council's activation and development initiatives. While this would include being proactive in relation to the coordination of initiatives such as Vacant / Derelict Sites, Residential Zoned Land Tax, development contributions, regeneration projects, etc., there are also important linkages to be created between project development and the monitoring and evaluation of implementation in relation to objectives of the county development plan.

Managing for Sustainable Development

Managing for sustainable development is primarily about ensuring that all aspects of decision-making advance the overall economic, social and environmental objectives for the local authority's area in a way that is internally integrated and in line with wider national and international obligations. This review found that there is room for improvement in the Council's procedures, for example in respect of environmental screening, particularly in relation to screening for Appropriate Assessment and Environmental Impact Assessment.

The Council is presented with a wide range of planning application types, some of which are complex in nature, such as renewable energy developments and associated infrastructure, which often require access to greater levels of expertise to inform decision-making, in the context of interfacing social, economic and environmental factors. Furthermore, the level of expertise available in relation to the protection of architectural heritage is limited. The report's overall emphasis on capacity building is not just about increasing staff numbers, there are clear opportunities for capacity building with regard to the enhancement of procedures and the development of greater expertise amongst staff in relation to specialist areas.

As the report notes, the number of unauthorised development complaints has been increasing year-on-year in recent times. As such, there must be adequate resources to investigate such complaints, in line with the statutory requirements. While the Council was found to be performing satisfactorily in the delivery of its enforcement function, given the steady increase in caseload, the development of an enforcement procedures manual would be of significant benefit. Furthermore, team capacity can also be increased by investment in appropriate ICT infrastructure to deliver a fit for-purpose planning enforcement case management system.

Delivering Quality Planning Services

Delivering quality services is not just about meeting the legislative requirements for development management. In this regard, while the planning department must be commended for the good quality of its decision making, with low appeal and overturn rates, there are higher standards of efficiency that could be achieved in progressing applications to the decision point.

For example, over many years preceding the conduct of the review, the rate of invalid planning applications received by Roscommon has been notably high¹, representing a drain on the department's resources. The increasing number of further information requests that have been issuing from the planning department in recent years is also of concern.

The trends as outlined can impede the planning department's efficient operation, requiring additional resource inputs, while at the same time creating frustration for those availing of the Council's planning service. Of course, the role played by applicants and their agents in preparing applications of an appropriate standard is key to addressing both these issues. Therefore, improving the quality of applications requires engaging with the Council's customers to communicate the necessary standards.

In terms of engagement with customers, it was of significant concern that the Council suspended its preplanning consultation service during 2024². The provision of such a service is a statutory requirement and its suspension undermined the overall quality of planning service available to the Council's customers. While it is crucial that the Council offers the public a pre-planning consultation service, a wider commitment to public engagement also offers the potential to address some of the other issues that are a drain on resources.

While delivering quality services in other operational areas is challenging (such as with regard to enforcement, the protection of architectural heritage, the processing of Section 5 declarations), the issues referenced above highlight how positive engagement with customers shifting the emphasis away from firefighting can actually reduce the workloads over time that is faced as applications of a higher standard create less.

Denying the public an opportunity to engage positively with the planning department before planning applications are framed is counterproductive. An inevitable consequence is a poorer standard of application and development proposals taking longer to traverse the planning process, creating more work for the team overall. This report recommends that the planning department makes a new commitment to public engagement, not just in relation to formal section 247 consultations but making the expertise of its planners more widely available to the public.

¹ Preliminary data received from Roscommon County Council in relation to 2024 invalidation rates indicates that this trend is since on a downward trajectory

² Roscommon County Council has indicated that this service since resumed in Q3 of 2024

3 Operating Context and Organisation of the Planning Department



Area Profile

County Roscommon covers approximately 2548km² and, by area, is the 11th largest county in the country. According to the Census 2022 results, the population of the county increased by from 64,544 in 2016 to 70,259 in 2022, representing a 8.9%³ increase in population. This is a significant increase when compared to the 2011-2016 census period, during which the population increased by 0.7%. The Roscommon County Development Plan 2021-2027 details that the population of County Roscommon is estimated to increase up to 70,500-71,500 persons by 2026 and 73,000-74,500 persons by 2031.

In 2022, County Roscommon had a population density of approximately 27 per km², which is substantially lower than the national average population density of 73 per km². Although a predominantly rural county, with approximately 70% of the population residing outside the main settlements⁴, the larger urban areas, including the county town of Roscommon and the Monksland area of Athlone, have experienced population increases in recent years, with this urban growth expected to continue in the future. According to CSO figures, in 2023 Roscommon had 198 new dwelling completions, of which 100 were single houses.

County Roscommon is bordered by counties Galway, Leitrim, Longford, Mayo, Offaly, Sligo and Westmeath. In a regional context, County Roscommon is part of the Northern & Western Regional Assembly area. However, there are also close alliances with the Eastern & Midlands Region, particularly as Athlone includes the Athlone West area in County Roscommon.

In terms of infrastructure and connectivity, the county is well served by strategic road and rail access; the M6 Dublin to Galway motorway in the south, with the N4 and N5 national primary routes to the north whilst the rail lines through the county provide east-west connectivity via the Dublin to Westport line and the Dublin to Sligo line. Roscommon, Boyle, Castlerea and Cortober (Carrick-on-Shannon), all have operational train stations that benefit from daily rail services. The county is also served by the N60, N61 and N63 national secondary roads. The N61 is of particular significance in a regional context, running through the county on a north-south axis and being an important connection between the two designated Regional Growth Centres of Sligo and Athlone.



Roscommon Town⁵

³ Higher than the national average of 8.1% from 2016 - 2022

⁴ Roscommon town, Monksland (which forms part of the Regional Growth Centre of Athlone), Cortober (which forms part of the Key Town of Carrick-on-Shannon), Ballaghaderreen, Boyle, Castlerea, Strokestown and Elphin

⁵ Photographs are copyright of Roscommon County Council; permission for use in the report is courtesy of RCC.

There are 38 designated European sites, which form part of the Natura 2000 network of European sites, located wholly or partly within County Roscommon. This network includes both Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). These sites are considered to be of significant importance at both European and Irish levels. Wetlands are also a significant feature of the landscape in County Roscommon, including lakes, eskers and turloughs, bogs, as well as many rivers and streams and their associated floodplains. The eastern boundary of the county is demarcated by the River Shannon and Lough Ree, while Lough Key in the north is one of the county's most notable natural assets.

Roscommon Town is the principal town and administrative centre of the county and is a designated 'Key Town' in the Northern & Western Regional Assembly's Regional Spatial and Economic Strategy 2020-2032 (RSES). The 2022 Census recorded a population increase in Roscommon town reflective of the population growth trend experienced at county level⁶. Analysis of detailed CSO data identifies that the town has a relatively young and diverse demographic profile, with almost 4,000 of the population aged between 0-50 years of age and approximately 22% of the population identifying as non-Irish.

Organisational Context

The executive of the Council is led by a chief executive who is supported by five directors of services, taking responsibility for the following functions:

- Regeneration, Economic Development, Town Centre First, Community, Tourism, Heritage
- Housing, Culture, International Protection
- Roads, Active Travel, Planning
- Climate Action, Environment, Information Systems, Corporate Governance
- Finance, Procurement, Enterprise, Building Control, Emergency Services

The elected Council is comprised of 18 elected members, representing the electoral areas of Boyle, Athlone and Roscommon municipal districts. There are three Strategic Policy Committees (SPCs), comprised of elected members and sectoral representatives, operating within Roscommon County Council. These SPCs provide an opportunity for wider representation in the policy making process. The SPCs are:

- Housing, ICT, Rural Water
- Planning, Environment, Climate Change, Corporate Governance
- Roads, Transportation, Emergency Services.

Roscommon County Council's overarching mission as set out in the Corporate Plan 2019-2024 is *"ensuring, through collaboration and the provision of strong leadership in partnership with the community, that County Roscommon is an attractive, inclusive, prosperous and vibrant place to live, invest, work and visit"*. Strategic objectives to facilitate this mission, providing an operational baseline for service delivery.

The strategic objectives are identified under the following three corporate priorities:

- Quality of life and well-being for all
- Economic and community development
- Quality service to our people.

Council Budget

Roscommon County Council's budgeted income for 2024 amounts to € 75,431,200 or €1,074 per person in the county. Specific state grants are the largest budgeted source of income for the Council (38% of total income). Income from goods and services (28%) also provide key income sources with rates and local property tax making up the remainder of the Council's income (17% and 16% respectively). With respect to budgeted expenditure for 2024, spending on road transportation and safety will comprise of 40% of the budget, with the remainder split between housing and building (12%), water services (8%), development management (13%), environmental services (11%), recreation and amenity (7%), agriculture, education, health and welfare (1%), and miscellaneous services (8%).

The activities of the planning department are funded under the development management heading of the Council's budget. Budgeted expenditure on the key planning functions (i.e. development management, forward planning, enforcement and unfinished housing estates) is €2,984,000⁷.

⁶ From 5,876 in 2016 to 6,555 in 2022

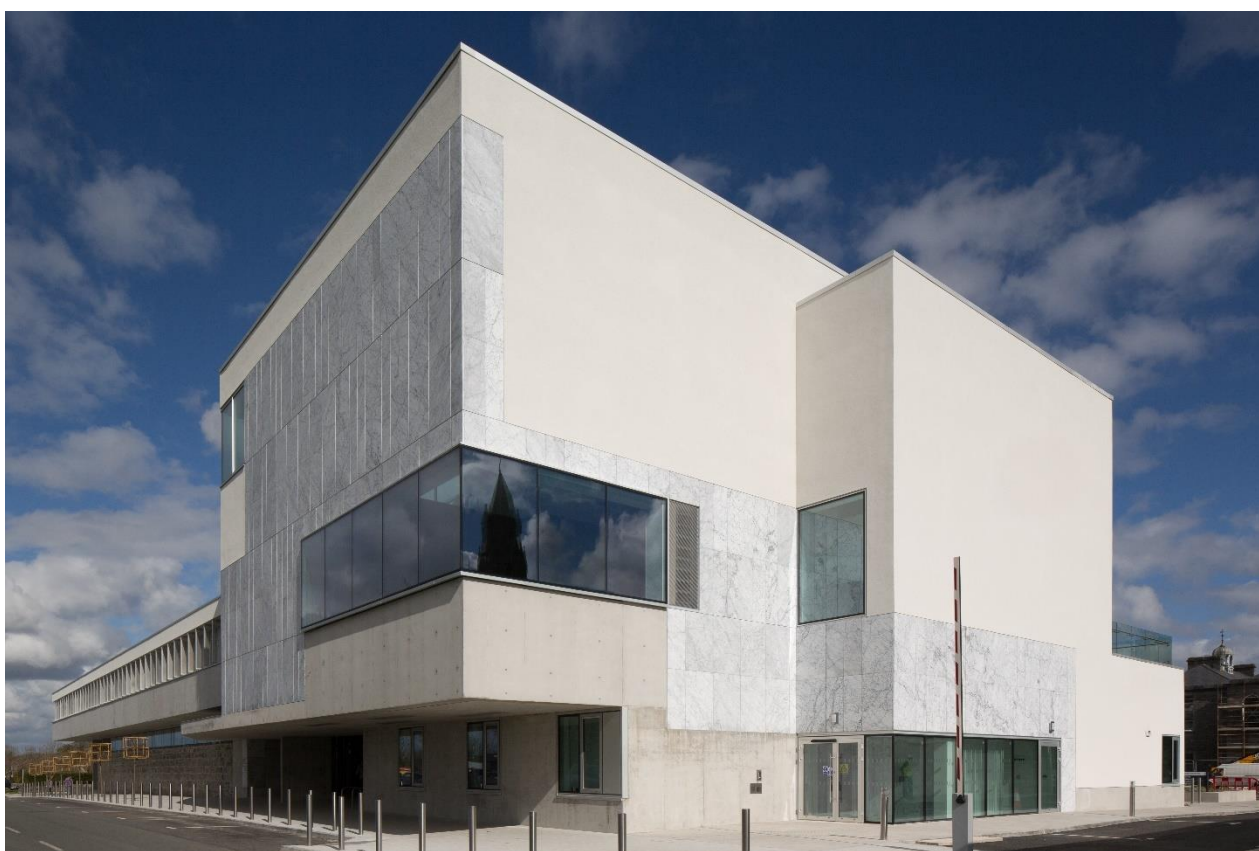
⁷ This figure does not include expenditure on Agency and Recoupable Services of €49,700

Ethical Framework

From a governance and ethics perspective, the Local Government Act 2001 and the related Local Government Regulations set out the ethical framework for the local government sector. The Ethics Registrar is required to keep a public register with two parts: (i) containing members' interests and (ii) containing employees' interests (for designated employees). The Council's registers of interests are available to view at the Council offices and on their website (in respect of elected members).

Similar to other local authorities, and in line with the ethical framework, it is expected that individuals in the planning department declare any potential and / or perceived conflict of interest to their line-manager in relation to a case file that might be assigned to them so that the file is allocated to another officer. This informal system of reporting requires officials to take individual responsibility.

As is the case with other local authorities, procedures in this regard should be strengthened to assist staff in addressing any matters that represent, or could be seen to represent, a conflict of interest. Such a procedure should incorporate sufficient and unambiguous guidance to allow all officials to consider all matters that could influence their impartiality, or perceptions thereof, in respect of the duties they perform on behalf of the wider public, and to ensure any matters raised are recorded, demonstrating good governance in this regard.



Roscommon County Council's Offices

Council Website

The provision of good planning services involves meaningful engagement in an open and comprehensive manner with local people, citizens and other stakeholders. This is evident by the implementation of processes and procedures to deliver clear communication, effective stewardship, and accountability. As is the case for other public service organisations in today's evolving technological environment, the Council's website provides the primary interface for the public and relevant stakeholders to seek information on, and interact with, Council services.

The NOAC report⁸ notes that Roscommon County Council's website recorded the lowest national page views in 2023, with 0.89 views per head of population. This is a significant decline on the recorded 2022 figure of 7.31 views per head of population.

In undertaking this review, Roscommon County Council's website was used to review various planning functions and services that the Council undertakes. The website is divided into sections, having regard to the various functions / services undertaken. The Council has advised that the various individual departments are responsible for the updating / uploading of information onto the website.

For the planning department, the website includes information regarding the planning process and development management in particular, as well as offering online versions of forms for planning applications, Section 247 pre-planning consultations, Section 5 applications, Section 57 declarations, licence applications etc., along with the validation checklist, and a link to the ePlanning portal.

While it was observed that weekly lists are generally uploaded onto the website in accordance with the Regulations, it is important that the planning department ensures that the publication is consistently uploaded in a timely manner. Further, the Council needs to ensure that all relevant documents pertaining to Part 8 applications (which has been detailed earlier in this report) are uploaded and readily available to members of the public to view online.

There is potential to revise the planning section of the website, to arrange by planning theme and to include information for the public on all aspects of the planning services provided by Roscommon County Council, under a single tab. In relation to the key planning processes, the Council should review the website to ensure relevant and up-to-date planning related information is readily accessible. For example, information in relation to Part 8's is contained under the 'Your Council' section of the website, as is information regarding RZLT. As such operational processes are governed under the planning legislation, it would be more helpful to members of the public if such information was also included in the planning section of the website.

It is noted that there is an 'Open Data' GIS enabled facility on the Council's website that provides spatially mapped data in relation to a number of Council functions. This has the potential to be an excellent resource for the public. Data from the development plan and various local area plans is recorded, along with other Council functions. However, it is important that this portal provides accurate and easily understood data. From a review of this portal, it was observed that while zoned lands, as contained in the development plan, are identifiable the individual zonings are not.

In addition to the Open Data facility, the Council's website also includes an interactive zoning map under the 'search planning applications' tab on the planning services home page. At the time of the review, the zoning maps that were contained in the online interactive zoning maps were consulted and it was found that the online maps available were associated with local area plans that are out of date (e.g. Castlerea LAP 2016-2022 and Strokestown LAP 2014-2022).

By way of general guidance, the Council is advised to undertake a review of the planning related pages of its website and to consider how information is presented to ensure that planning services are easily accessible and obvious for members of the public. It should be considered how all relevant planning related information could be collated under a single tab / section, as well as implementing a procedure to ensure that information is accurate and updated in a timely manner.

Other areas of improvement in the provision of accurate and timely information to the public have been identified in this report, e.g. enhancements to the enforcement section of the website.

As already noted in this report, the Council should ensure compliance with statutory requirements regarding the publication of planning related documentation such as weekly lists, Part 8 documentation, etc. Further, there are opportunities for the enhancement of the website's existing GIS functionality through the integration of a variety of spatially mapped planning data, including enforcement data, estates that have been taken-in-charge, unfinished housing estates, derelict and vacant sites, etc.

⁸ National Oversight and Audit Commission, ['Local Authority Performance Indicator Report 2023'](#)

Organisation of the Planning Department

The planning department is overseen by a Director of Services who also has responsibility for the Council's roads, active travel and infrastructure functions. A senior planner leads the department on a day-to-day basis, having responsibility for business management and human resource issues, as well as procedural operations and the technical supervision of planning outputs. While previously a designated role had been filled, at the time the review process was being conducted there was no senior administrative position in the department and as a result an inordinate volume of workflow and responsibility being channelled through a single individual.

In total there are 23 individuals, equating to 21.5 full time equivalents (FTE), working in the department. There were four vacancies at the time of the review (two executive planners and two assistant planners). Table 1, below, details staffing numbers at the various technical and management / operational roles at the time the review was being conducted.

Staffing	Full Time Equivalents
Planners	12 ⁹ (includes 4 vacancies)
Technical	3 ¹⁰
Administration	10.5
Total	25.5 (includes 4 vacancies)

Table 1 | Staffing structure

Given the breadth of duties that it is required to deliver, the Council's staffing allocation to the planning department is quite limited. It goes without saying that the planning department would benefit from an increase in its overall staffing sanction. At the time the review process was being conducted the planning department was suffering an overall staff vacancy rate of 16% (four vacancies from 25.5 positions), making the challenges it faces all the more difficult to surmount. When, on closer inspection, it is noted that the four vacancies relate to planner positions, i.e. a vacancy rate of 33% in relation to planners, the challenges the department is facing are brought into even sharper focus.

Furthermore, engagement with the department's official's highlight the difficulties the Council has had recruiting for technical positions and retaining staff in recent years. The recently published Action Plan on Planning Resources has highlighted a national issue in relation to a severe shortage of professional planners and insufficient output from the country's planning schools, which is to be addressed through a range of actions.

A high staff turnover rate is costly in any business area. It manifests at the organisational level as a drain on resources in terms of recruitment, induction, training, etc., but it can also be wearing at the personal level, having an influence on morale as increased workloads and responsibilities affect the individuals still in position. Looking at this resourcing position with an awareness of the duties any planning department has to deliver on makes it obvious that staff are operating under significant pressure. It is clear that the Council's ability to deliver its planning functions successfully to date has been built on the effort of dedicated staff. The department's operation with limited resources, not to mention vacancies in key technical positions, is a testament to the commitment of these staff. However, it is also obvious that the strain of continuous pressure will take a toll on staff, as it would in any organisation where operations are delivered with limited resources on an ongoing basis.

The responses to the OPR's staff survey underlines this further, where the necessity for staff to work beyond, and outside, of core hours, as well as limiting leave options, is a recurrent theme. Ongoing references are made to the working environment as 'consistently intense', 'unsustainable', 'fire-fighting', 'a massive effort'. While almost every response to the final question 'what actions could be taken to assist the

⁹ Currently comprising 1 senior planner, 3 senior executive planners, 4 executive planners (2 of which are vacant posts) and 4 assistant planners (2 of which are vacant posts)

¹⁰ Comprising of an executive engineer and two Grade I technicians

planning department in the delivery of operations’ references the current resourcing position. Inevitably, constant pressure will effect morale. In this regard it is of concern that only 30% of respondents agreed that ‘the planning department has a positive work culture’ (Q.1 of the OPR staff survey). The written responses include numerous references to organisational morale referencing a ‘strained work force’, ‘work life balance’, ‘unreasonable expectations’ and the ‘stress’ associated with working under high expectations and continuous pressure. The planning department is organised into three teams, namely:

- development management,
- forward planning; and,
- technical hub.

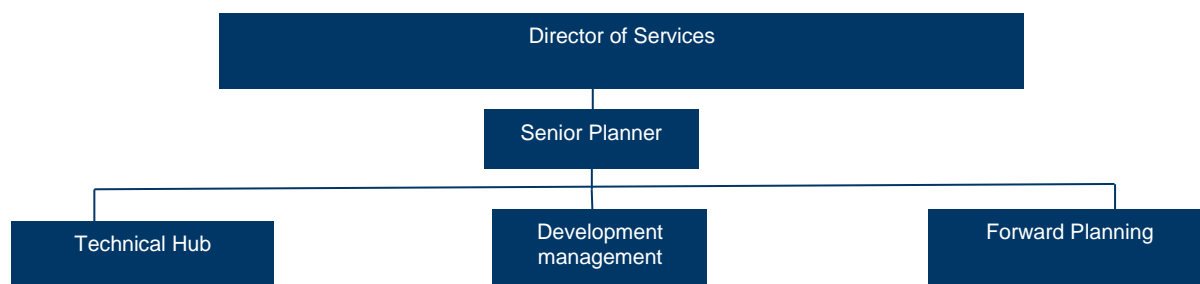


Figure 1 | Planning department teams and functions

Development Management

A senior executive planner leads the development management functions, with the support of an executive planner, an assistant planner and a technician (Grade I). At the time the review process was being conducted, there were two vacant planner positions in the team comprising an executive planner and an assistant planner. The team is further supported by two senior staff officers and an administrative team of a further 7 staff (7.5 FTE), who coordinate the operational aspects of the development management function. The senior staff officers report to the senior executive planner. The core responsibilities of the development management team are assessing and making planning recommendations on planning applications, Section 254 licences, Section 5 determinations, Section 247 consultations and compliance submissions.

Forward Planning

This function is managed by a senior executive planner who is supported by an assistant planner. At the time of the review process being conducted, there was an executive planner vacancy in the team. There is no dedicated administrative support for the forward planning team, rather administrative support is provided from all existing teams across the planning department as various phases of forward planning activity arise. Activities include county development plan monitoring, local area plan preparation, employment land review and Residential Zoned Land Tax (RZLT) progress.

Technical Hub

A senior executive planner oversees this team with the support of an executive engineer, an executive planner and a technician (Grade I). At the time of the review process being conducted, there was an assistant planner vacancy in the team. Operational support comes from administrative staff of three, who are managed by the senior executive planner. The core responsibilities of this team are planning enforcement, taking-in-charge and unfinished housing developments along with development contributions, levy collection and management of the Vacant Site Register.

While there is no GIS officer within the planning department, there is a GIS technician working in the Council’s IT department whose expertise is made available to the planning department, as well as other departments, as necessary. At the time of the review process, there was no conservation officer in the Council; however, the heritage officer (who works in the community and enterprise department, within a different directorate) provides assistance when required in relation to architectural heritage. Likewise, there was no biodiversity officer or environmental assessment officer in the Council, however the environment department’s technician provides assistance to the planning department on Environmental Impact Assessment (EIA) and Appropriate Assessment (AA) issues when required.

Table 2 and Figure 2 illustrate the allocation of staffing between different teams.

Staffing	Full Time Equivalents
Senior Planner	1
Development Management	13.5 (includes 2 vacancies)
Forward Planning	3 (includes 1 vacancy)
Technical Hub	8 (includes 2 vacancies)
Total	25.5 (5 vacancies)

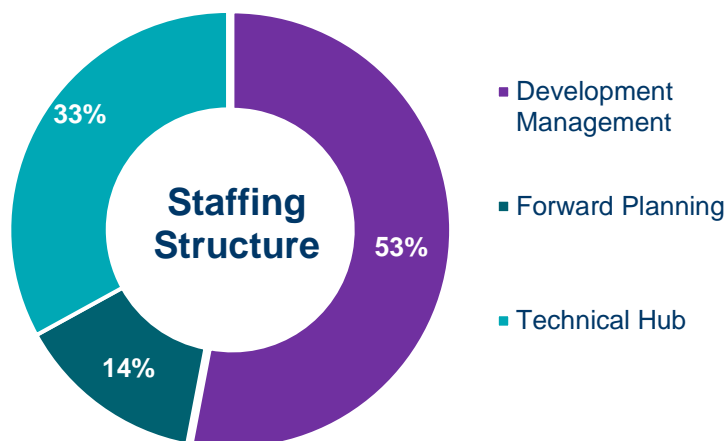


Table 2 | Staffing of teams

Figure 2 | Team structure breakdown

The planning department's administrative staff are organised around the various teams, with some staff taking responsibility in relation to more than one operational area. For example, as various phases of forward planning activity arise administrative support from all existing areas across the department may be utilised. There are 12 staff members (10.5 FTE) providing administrative and operational support within the department, with no vacant positions at the time of the review.

At the time of the review, there was no senior executive officer or administrative officer position in the planning department; the most senior administrative staff was at senior staff officer grade (of which there are two, equating to 1.8 FTE). At the same time, it is noted that senior planning staff, including the senior planner, take responsibility for tasks that are operational in nature. The absence of a senior management position among the administrative staff is notable.

Planning Department Budget

Table 3, below, provides details of 2024 budget allocations in relation to key areas of planning service delivery and highlights the percentage change from 2023.

Planning Function	2024 Budget	% of 2024 Budget Allocation	% change from 2023 Budget
Forward Planning	506,300	0.67%	4.7% increase
Development Management	1,527,700	2%	5.2% increase
Enforcement	521,100	0.69%	10.9% increase
Unfinished Estates	428,900	0.56%	9.6% increase
Total	2,984,000	3.9%	2.5% increase

Table 3 | Planning department budget allocation

The National Oversight & Audit Commission (NOAC), through its 'cost of planning' analysis¹¹, indicates that the Council's expenditure on planning in 2022 was €36.12 per capita¹², a reduction from €63.82 in 2021 or 42.2%. However, the 2022 figure is higher than the national average of €33.54 and compares to neighbouring counties as follows: Galway County (€24.00); Leitrim (€41.68); Mayo (€33.34); and Westmeath (€26.56).

Business Planning and Performance Management

The planning department prepares an annual operational plan that is informed by the Council's Corporate Plan and Annual Service Plan. The planning department's operational plan for 2024 includes targets for supporting the objectives of the Council's Corporate Plan. These targets include the core statutory requirements of the department as well as other responsibilities such as:

- the facilitation of pre-planning consultation meeting requests within specified timeframes and,
- an annual reduction in the number of unfinished housing estates.

The targets are further distilled into the individual performance plans of departmental staff. These individual plans are the performance management development system used across the Council to measure and monitor the outputs and deliverables of staff across the organisation.

While the planning department indicated that performance plans, including end-of-year reviews, had been completed for most staff during the past couple of years it is recognised that maintaining a focus on performance management and development can be difficult when day-to-day workloads dominate attention. As staff capacity reduces, this leaves limited capacity to focus on staff development, training and wider contingency planning. Nevertheless, it becomes even more critical that management commit time to reflect on team and individual performance and development, and to provide support to staff, in circumstances where teams are under significant pressure.

While, based on the information provided, meetings take place at senior management level within the Council on a schedule, it appears that meetings within the planning department do not take place on a regular or scheduled basis, primarily being ad-hoc and reactive. The responses to the OPR survey reveal that many staff feel the department would benefit from structured meetings.

In this regard, it is considered important in any organisation that team members would be afforded regular, formal opportunities to provide feedback to management on operational issues, through structures where clarification on priorities is provided and progress can be monitored. In any busy operational area, it is important that time is made available to reflect on team performance and progress towards organisational objectives, to recognise the efforts being made by staff and to consider the supports required for staff who may be under significant pressure.

With regard to training, while there is no overall learning and development plan in place at departmental level to address skills / training, individual staff members may identify their training requirements through the annual individual performance plan process.

However, as already noted, in an operational environment where staff are under significant pressure to deliver on day-to-day workloads and backlogs, it can be difficult for individuals to properly consider, and pursue, the supports they may require. This can be even more of a challenge for non-technical staff who do not benefit from the structured approach to continuous professional development associated with membership of the professional representative bodies.

This situation above is reflected in responses to the staff survey where a number of comments are made regarding workload responsibilities taking precedence over staff development needs. Feedback received through the survey also documents the experience of some staff in relation to not feeling supported in terms of role-specific training or induction into the department. With just 15% of respondents indicating agreement with the statement 'I have access to sufficient learning and development opportunities to support me in my role', this is clearly an area where improvements could be made.

¹¹ National Oversight and Audit Commission, 'Local Authority Performance Indicator Report 2022', (2023).

¹² *ibid*

Considerations and Recommendations

Roscommon County Council's planning department is operating under the strain of significant capacity constraints, and this will be evidenced further throughout this report. The resourcing challenge is twofold, in that, while the department would clearly benefit from an increase in staffing numbers, in the first instance, the department finds it difficult to fill and maintain its existing complement of sanctioned planner positions.

Working in crisis management mode on an ongoing basis becomes a vicious circle, one where tasks that should be dealt with are pushed out, ultimately requiring more input to resolve in the long run, and thereby further increasing the demand on limited resources. This can also affect individuals' sense of agency or control in relation to performing their own role, which over time has a negative impact on organisational morale.

While it may be obvious that the department requires additional resources, a simple recommendation on its own that the Council's senior management sanction more staffing will not solve the matter. Like most local authorities, in the current employment market Roscommon County Council is finding it difficult to recruit new staff, an issue that is even more apparent in relation to specialist positions such as planners. Therefore, while the provision of additional resources is certainly recommended, it is even more important that the review points towards the creation of increased capacity within the planning department. While increased capacity can be generated through the assignment of additional staff, it can also be created by working in more efficient structures.

While spending more time on the structures of management, internal communications, and the integration of learning and development into day-to-day business, might seem counter intuitive while workloads are escalating, assigning time to such business planning can reduce the pressures of a crisis management environment. It is important that the planning department is seen by staff to be a positive and rewarding place to work where job satisfaction and resilience can be maintained. This necessitates ensuring that staff across the department feel fulfilled in their roles and that there are developmental opportunities for all staff to build expertise and experience.

While it is recognised that the planning department is actively pursuing recruitment to fill vacancies and that the Council continues to engage with the LGMA and the Department of Housing, Local Government & Heritage in relation to securing resources to build planning capacity, the Council itself should also give appropriate consideration towards additional supports for the planning department in the context of its own assignment of internal resources. To support this, the planning department should conduct its own analysis, identifying key requirements for technical and non-technical roles, to support improved effectiveness and bring greater balance in relation to the organisation of the department. This should include identifying areas where capacity can be increased in terms of coordinating business planning, budgetary, recruitment and learning and development processes.

It is considered that, of the various additional positions that could be created, the establishment of a senior administrative role would be of major benefit to the operation of the planning department. The creation of such a role would bring a greater balance to the department, one where administrative efficiencies could be prioritised alongside technical outputs. This would reduce the burden on the department's senior planner, and senior executive planners, with regard to day-to-day responsibility for management and operations. Fundamentally, the establishment of such a role would provide greater capacity for the department's planners in relation to technical output, while also being a driver for procedural enhancement, operational oversight and administrative leadership.

The department also needs to place a stronger emphasis on business planning by ensuring that meetings take place on a regularly scheduled and consistent basis. All staff should be kept apprised of operational priorities and issues of wider strategic importance, as well as being provided with opportunities for feedback. Meetings should be scheduled appropriately at team and departmental level, with a focus on building departmental capacity, but also team resilience and morale, through a more inclusive approach to the organisation of workload.

Developing a greater culture of training, mentoring and the enhancement of specific skillsets can only serve to assist the planning department in being better resourced, more resilient and further motivated to address the challenges it faces. The identification of training needs (including induction of new staff), skills requirements and mentoring opportunities should be identified at departmental level rather than being left to individuals alone to negotiate. A strategic departmental training plan should be prepared to identify the

immediate and longer-term developmental requirements for technical and administrative staff, as well as setting out a plan for its implementation.

Finally, given the informal manner in which conflicts of interests are currently managed within the Council, the planning department should take the opportunity to be proactive in establishing a formal procedure to ensure that staff are aware of their obligations on actual, or perceived, conflicts of interest. This should include the requirement for staff to consider all matters that could influence impartiality, or the perception of independence, in respect of the duties they perform. This should be designed to ensure that all potential conflicts are clearly identified, and that safeguards are implemented to avoid decisions being made without conflicts being appropriately identified or addressed. The OPR will be working generally with the wider local authority planning sector in relation to strengthened procedures with regard to conflicts of interest.

Recommendation 1 – Capacity Building

The Council must ensure that capacity is increased in the planning department to support staff in the delivery of its various functions. A multifaceted approach should be taken. Firstly, an urgent internal assessment report should be prepared identifying existing and future workloads and cross-referencing these to, both minimum and optimal, resource requirements. This assessment should be presented to the Council’s senior management with a view to the allocation of appropriate additional resources to the planning department.

At a minimum, a senior administrative position, reporting to the Director of Services, should be created within the planning department. A strengthened commitment to business planning, internal communications, workload management and staff development should be introduced immediately, with the newly established senior administrator assuming responsibility for driving a programme of business process improvement upon assignment. This will include scheduling team and departmental meetings on a regular basis, the implementation of a strategic departmental training plan and the development of efficient work practices across all areas of operation.

The necessity to create additional capacity, through additional resources and procedural enhancements, is given specific illustration in relation to the various planning functional areas throughout the rest of the report.

Recommendation 2 – Conflict of Interest

The planning department should develop a procedure for staff to proactively identify and manage potential conflicts of interest. This procedure should include sufficient guidance to allow all individuals consider, and be aware of, any matters that could influence their impartiality, or the perception of their independence, in respect of the duties they perform.

No.	Recommendation	Grading	Responsibility
1	Capacity Building	Critical	Director of Services
2	Conflict of interest procedures	Medium	Senior Planner



4 Forward Planning



As set out in the National Planning Framework (NPF), County Roscommon lies within the Western area, along with the counties of Mayo and Galway. Part of Roscommon functionally operates as part of the Midlands area, whereas the northern part of the county is influenced by proximity to Sligo and Leitrim. The importance of regional interdependencies is recognised in the NPF, which requires a co-ordinated approach to development at both regional and county / town level. More broadly, policy approaches to capitalise on quality of life and sectoral strengths, and to incentivise town and village renewal are advocated for in the NPF.

In a regional administrative context, County Roscommon is located within the Northern & Western Regional Assembly area, however, there are close alliances with the Eastern & Midlands Region, as the regional growth centre of Athlone extends into County Roscommon. The Northern & Western Regional RSES provides a framework to deliver effective regional development. Therein it identifies Roscommon town as a key town that has a strong service and industrial sector which is strategically located in terms of the Galway Metropolitan Area Strategic Plan and has the potential to develop further and have a continued positive influence on its hinterland and the overall county.

The Roscommon County Development Plan 2022-2028 aligns planning policy at county and local levels with regional and national policy. The development plan outlines the Council's commitment to working for the common good for the people of County Roscommon, and through the development plan sets out "a positive and sustainable approach to developing the county economically, socially and culturally for the benefit of current and future generations".

County Roscommon's transitional population projections to 2031¹³ are set out in Table 4 below:

County	2016	2026	2031
Roscommon	64,500	70,500-71,500	73,000-74,500

Table 4 | Transitional population projections for County Roscommon to 2031

These figures are distilled into the core strategy of the county development plan which provides for a housing target of 2,353 housing units, and an expectation that 392 units will be delivered per annum between 2022 and 2027¹⁴. Development management output, in terms of planning permission granted, will be discussed in greater detail later in this report, however at this point it is worth noting that the volume of applications received saw planning permission for just 152 residential units granted during 2023¹⁵. No apartment units are included in this figure, while 6 multi-unit developments (accounting for 75 residential units) are included. This reveals the significant gap between identified demand for housing units versus actual delivery, and further indicates the disproportionate percentage of housing delivery that is accounted for by single dwellings, which are principally located in unserved areas.

However, aside from the strong pipeline of public housing being progressed by the local authority and its partners, it is acknowledged that the limited number of planning applications in respect of private multi-unit developments received by the Council appears to point to a weakness in present market conditions in the County for the provision of private market multi-unit (scheme type) housing in many parts of the county. Notwithstanding the planning department can play a significant role to encourage confidence in the planning process in respect of multi-unit developments into the future.

¹³ As per the Implementation Roadmap for the National Planning Framework, 2018

¹⁴ RCC, 'County Roscommon Housing Strategy and Housing Needs Demand Assessment'.

¹⁵ CSO, 'Planning permissions, Q4 and year 2023. Key findings', (2024).

The growth projections as outlined in the development plan for Roscommon Town indicate the need for 600 new residential units over the lifetime of the plan (i.e. 2022-2028). The Roscommon Town Local Area Plan identifies a target of at least 30% of these units (i.e. 180 residential units) are required to be delivered on infill / brownfield lands in relatively central locations in the town.



Co. Roscommon, Aerial View

Forward Planning Resources

The forward planning team is led by a senior executive planner with the support of an assistant planner. There is a vacancy for one executive planner on the team¹⁶. There is no dedicated administrative support within the forward planning team. Rather, as noted above, such support is provided from the wider planning department's personnel when required, generally from the development management team.

The team has responsibility for the review of the county development plan, as well as the preparation of the development plan monitoring report and preparation of statutory local area plans for two towns in the county, namely Roscommon Town and Boyle. The forward planning team are also assisting in the preparation of the Athlone Joint Urban Area Plan and the Carrick-on-Shannon Joint Local Area Plan in conjunction with Westmeath County Council and Leitrim County Council.

In tandem with these functions, the senior executive planner prepares consultation responses on behalf of the planning department in respect of any Part 8 proposals and represents the planning department on a range of initiatives including membership of the Lough Ree Biosphere Project Steering Group, the County Roscommon Heritage Forum and Roscommon County Council's Climate Action Team.

Additional functions assigned to the forward planning team include:

- Residential zoned land tax – preparation of maps and consideration of submissions.
- Preparation of the development contribution scheme.
- Preparation of design guidelines. Preparation of submissions on behalf of Roscommon County Council to national and regional plans.

¹⁶ Staffing arrangements in place at the time the review was being conducted.

As noted earlier in the report, the strain on resources across the department is obvious, it is a clear concern in the forward planning team where, even with the filling of the executive planner vacancy, capacity constraints would act against simultaneous pieces of significant work being undertaken.

Preparation of the County Development Plan

The preparation of the county development plan is one of the most important functions of a local authority. Key activities during the plan preparation process included:

- pre-draft data collection and analysis, including the screening and scoping of environmental assessments;
- preparation of background papers on topics including retail strategy and housing needs demand assessment;
- informal workshops with elected members;
- extensive internal department engagement, including whole departmental input into the preparation of an updated Record of Protected Structures; and,
- engagement with relevant agencies at appropriate stages including infrastructure providers, and interested bodies such as Uisce Eireann, Transport Infrastructure Ireland and the National Parks & Wildlife Service.

The Roscommon County Development Plan 2022-2028 came into effect in April 2022. The development plan consists of a written statement (volume one), accompanying maps (volume two), as well as a number of associated documents, strategies and environmental reports undertaken on the plan. The settlement, village and area plans as contained in volume two of the development plan supersede many of the local area plans (LAPs) that have previously been prepared, for example in respect of the towns of Castlerea and Ballaghaderreen. Both Roscommon Town and Boyle town were not included given that statutory LAPs are required for both towns.



The Office commends the planning department for their commitment to progressing the county development plan during challenging times when pandemic restrictions were in place. The level of commitment required by all staff to progress this statutory document in accordance with the legislative requirements, while such challenges were presenting, is recognised. In particular, it is noted that, following an analysis by the forward planning team of public engagement on previous plans, new methods of consultation were developed in an effort to increase the numbers engaging in the plan making process.

During the preparation of the county development plan, the planning department used both traditional and new methods of consultation. The new methods were primarily digitally based, which took on increased significance through the course of the plan making process. These included the creation of a unique identity brand for the Roscommon County Development Plan, the development of a website dedicated to the plan-making process and designed to facilitate online submissions, and the use of social media to publicise and promote the plan-making process. These initiatives fostered a high level of engagement during the various steps of the plan making process, including the receipt of 148 (out of a total of 160) submissions using the online platform on the dedicated development plan website.

At the time of the review, there was no procedures manual in place in relation to the plan-making process, and any associated variations. Having a documented procedure in place for important aspects of the plan-making process, such as consultation exercises, communications and data collection, reduces the risk that knowledge might be lost with staff movement over time and can ensure greater efficiency and consistency of approach. The preparation of such procedural manuals are important for ensuring consistency of approach and ensuring efficient communications and engagement methods. Furthermore, having documented procedures would reduce the risk of error when it is necessary to avail of temporary administrative support that may only be available at key stages of the plan-making process rather than on a continual basis.

Development Plan Monitoring

Reporting on the progress of implementing the development plan objectives, two years after the adoption of the plan, is required under section 15(2) of the Act in the form of a chief executive's report. The two-year progress report on the Roscommon County Development Plan was presented to the elected members of the Council in July 2024. At the time of the review, the Council explained that the delay in presenting this

report to the elected members was as a result of capacity constraints within the planning department, caused by the progression of a statutory LAP and deadlines that ran concurrently with the requirement to deliver this report.

During the review process, it was outlined that the planning department are looking at developing a systematic recording process for future monitoring. The development of such a monitoring system would align with the Development Plan Guidelines, which emphasise the importance of establishing an ongoing programme of monitoring and that strategic data collection and analysis should take place before, during and after the plan-making process as a permanent function of the planning department.

It is an increasing requirement that local authority planning departments can maintain strategic data on an ongoing basis, particularly in relation to core strategy implementation, as well as vacancy rates and renewable energy objectives. Achieving this, in line with statutory requirements as well as the general expectation for evidence-based policy development, necessitates significant resources being assigned to the monitoring and analysis of relevant data.

The Guidelines also recognise the complexity of developing monitoring systems. A significant challenge in this regard for Roscommon County Council's planning department is the ongoing availability of GIS expertise given that the department does not have a dedicated resource and must rely on the availability of assistance from a GIS Officer that is assigned to the Council's IT department. While the availability of assistance is welcome it is recognised that this GIS officer will have other responsibilities and priorities to deliver on, rather than being focused on the work of the planning department.

The growing importance of monitoring the implementation of planning objectives and reporting on this to the elected members and the public, underlines the need for the planning department to have ongoing access to GIS expertise and a wider capability to develop systems that will accurately record, analyse and illustrate crucial information. While a planning department technician was previously upskilled in relation to GIS, that member of staff has since departed the Council. Nevertheless, it is important that further investment in terms of training, technologies and resources be provided to support the planning department's need for GIS capability and overall monitoring of planning and development information. With reference again to Recommendation 1, securing GIS capability as an assigned or shared resource should be considered, as should the capacity to upskill other staff within the department.

Preparation of Local Area Plans

The county development plan sets out the settlements for which LAPs will be prepared. Given the identification of Athlone as a regional growth centre in the NPF, particular importance is placed on the preparation and adoption of a joint urban area plan for Athlone.

Collaborative preparatory work with Westmeath County Council on the Athlone Joint Urban Area Plan (JUAP) has been ongoing for the last number of years. Supporting bodies of work that will inform the preparation of the JUAP have been completed, including the publication of the Economic Strategy for the Regional Centre of Athlone in November 2022 and the finalisation of an Area Based Transport Assessment in June 2023.

In respect of direct pre-draft work on the Athlone JUAP, engagement between both authorities has been ongoing, in accordance with a signed memorandum of understanding (MoU). Pre-draft public consultation, informed by the preparation of a Strategic Issues Paper, has taken place, and included a public consultation event in Athlone Civic Centre. A total of 52 submissions were received as part of the public consultation process. This Office commends both local authorities for recognising the importance of providing agreed collaborative structures from the outset and actively progressing the preparation of the JUAP.

At the time this review, the Roscommon Town LAP had recently been adopted. As part of the public consultation in respect of the LAP, the Council hosted a 'drop-in' event over a single day in January, where planning staff were available to meet with members of the public in relation to the LAP. This is a positive initiative by the planning department, which should aid with the public's knowledge and awareness of the local area plan making process.

Preparatory work and public engagement for the Boyle LAP has been completed, with the publication of a strategic issues paper in June 2022 and a summary report on the submissions received being issued to the elected members of Boyle Municipal District in September 2022. However, work on this LAP has not

progressed to the statutory stages of the plan-making process. The Council intends, subject to staff resource availability, to recommence work on the preparation of the Boyle LAP as soon as possible.

In tandem with the preparation of these LAPs is the preparation of a joint LAP for Carrick-on-Shannon, which is being prepared jointly with Leitrim County Council. Similar to the Athlone JUAP, a MoU has been signed between the two local authorities with respect to the preparation of this joint LAP. At the time of this review, public consultation on the draft plan was underway.

To facilitate public consultation and engagement in the Carrick-on-Shannon joint LAP process, a dedicated website¹⁷ has been created, which explains the purpose and various stages of the plan-making process. An interactive mapping feature has been developed on the website, which allows for easy identification of the proposed land-use zonings, flood risk, built heritage and opportunity sites. This initiative is to be commended as it serves as an excellent example of collaboration between local authorities in the preparation of such a joint LAP.

The preparation of the standardised LAP checklist is also acknowledged, which comprises a comprehensive list of key stages of the plan-making process. Having a documented template procedure in place for important aspects of the process, such as consultation exercises, communications and data collection, reduces the risk that knowledge might be lost with staff movement over time and can ensure greater efficiency and consistency of approach.

However, a detailed schedule for the overall delivery of the Council's forward planning workload is not in place, with the Council noting the potential impact of various considerations, including resource constraints and imminent legislative changes, which would influence the delivery of this work programme.

Additional Duties and Activities

In addition to the various plan-making processes, the forward planning team is responsible for implementing the requirements of the Residential Zoned Land Tax (RZLT). The process of applying the RZLT is critical to ensuring that serviced and zoned lands in appropriate locations are activated. The forward planning team are also responsible for the preparation of a new development contribution scheme. The existing development contribution scheme was prepared in 2014 and updated in 2020. The team also prepare consultee reports in relation to Part 8 applications, which it is recognised can absorb a significant amount of time.

Compliance with EU Directives

The Council engaged consultants to prepare Strategic Environmental Assessment (SEA), Appropriate Assessment and Strategic Flood Risk Assessment as part of the development plan making process. In terms of monitoring the significant environmental effects of the implementation of the plan in accordance with the SEA Directive and Development Plan Guidelines, the Council do not have a process in place. However, it was stated that this function would be carried out by the relevant consultants who prepared the SEA.

Amenity Objectives

In 2021, the OPR published a case study paper on the operation and implementation of section 10(2)(o), regarding rights of way in the development plan.¹⁸ The case study paper noted that Roscommon County Council carried out a significant body of work in 2014 on public rights of way, which included detailed information and site inspections on 34 identified public rights of way. Map 11.1 as contained in development plan lists and identifies the 17 existing public rights of way in the county, with details of each right of way contained in Table 11.2 of the plan. The development plan also contains an objective to preserve and enhance existing and reputed public rights of way to recreational areas.

The Council recognises the important ecosystems of the county's peatlands and bogs, with policy objectives incorporated into the development plan to protect and enhance such resources. Further, the plan commits to working with relevant agencies and adjoining local authorities to prepare an after-use framework plan for the peatlands and related infrastructure and to provide for the future sustainable use of former industrial peatland sites (Policy objective NH10.13).

¹⁷ RCC & LCC, '[Carrick-on-Shannon Joint LAP](#)'.

¹⁸ Office of the Planning Regulator, '[Public Rights of Way and Local Authority Development Plan](#)', (2021)

Other Council policies with respect to amenities are set out in Chapter 4 (Section 4.8 – derelict sites), Chapter 5 (Section 5.6 – forestry), Chapter 6 (Section 6.7 – tourism), Chapter 8 (environment and green spaces and nature based solutions), Chapter 9 (Section 9.6 – heritage gardens, demesnes and designated landscapes), and Chapter 10 (Section 10.7 – woodlands, trees and hedgerows, Section 10.13 – landscape character, Section 10.15 – green infrastructure strategy).

In addition to the objectives contained in the development plan, a renewable energy strategy and landscape character assessment have also been prepared. In order to identify areas in the county that would be suitable to accommodate renewable energy developments, the renewable energy strategy included an evaluation of the landscape and its sensitivity to potential renewable energy developments. The landscape character assessment analyses the landscape of Co. Roscommon to ascertain its character and provides a technical background for the formulation of appropriate landscape policy objectives. Further, the character assessment contains maps that identify the location of protected views and designated scenic routes in the county.

Table 6.1 as contained in the development plan outlines a broad range of walking and cycling routes in the county. The Council has been proactive in the initiation and delivery of a range of amenity projects across the county, including:

- Developing and promoting cycling routes through the ‘Green Heartlands’ of Co. Roscommon. This cycle route incorporates a 211km circuit with extensive views of Lough Ree and Lough Funshinagh.
- In a joint venture between the Council and Coillte, Lough Key Forest Park incorporates 350 hectares of woodland, walking trails and bog. The park incorporates an outdoor activity centre, a tree top walk and a camping and caravanning site.
- In collaboration with Longford County Council, work is progressing on the development of the Mid Shannon Wilderness Park Greenway, which will consist of the creation of a greenway long decommissioned Bord na Mona rail lines.

The development plan recognises the importance of such amenity projects, in terms of both economic and social benefits, as well as supporting agricultural diversification in rural communities, and has incorporated proactive policies to futureproof such amenity development opportunities.



Lough Key Forest Park, Co. Roscommon

Performance Rating and Recommendations

Recognising the team’s ongoing achievement in meeting its statutory plan-making requirements, the Council’s delivery of its forward planning function is considered to be **satisfactory**.

However, the limited resources that are available to support the forward planning team is of concern, particularly in light of the fundamental requirement to ensure the ongoing monitoring and implementation of the policy objectives contained in the development plan, as well as the preparation of the local area plans and the new development contribution scheme.

The overall issue of resourcing has been covered in Recommendation 1 and consequently is not revisited here by way of an additional recommendation, however, it must be recognised that appropriate resourcing will be crucial in achieving the strategic ambitions of, not only, the Roscommon County Development Plan, but also the RSES and NPF. It is imperative that the Council considers and mitigates against potential risks to the delivery of its statutory forward planning functions and considers the practicalities of the team available being able to carry out the various bodies of work required and expected of it.

Given that, at the time of the review, there was no permanent administrative support in the forward planning team and noting the existing planner vacancy and ongoing pressures in terms of filling and maintaining positions, the development of a forward planning manual would mitigate some of the risk facing the forward planning function. Such a manual, which should incorporate the existing LAP checklist, would provide an operational baseline for planners and administrative staff that may be involved in the various significant statutory plan-making processes into the future.

Finally, it is important that the Council ensure that the implementation of development plan objectives are monitored and analysed. The development of expertise in the planning department, along with the development a robust evidence base, provides an opportunity for the wider Council to ensure that future policies and initiatives can be strategically targeted and thus have the greatest effect.

Recommendation 3 – Forward Planning Work Programme

In tandem and cross-referenced to the assessment report outlined in Recommendation 1, a forward planning work programme should be prepared, detailing both the expected and essential outputs for the next three years. Details should include the resources required to deliver such outputs. This programme should include tasks such as annual reporting on development plan objectives, the phased delivery of other projects including local area plans, the preparation of a new development contribution scheme, the management and application of the RZLT and capacity for the preparation of Part 8 consultee reports. This work programme should be submitted to senior management of the Council for consideration.

Recommendation 4 – Procedures Manual for Plan-making

A procedures manual for plan making should be developed for the use of staff across the planning department. The manual should document procedures integral to the plan-making process, e.g. data collection requirements, analysis, drafting, consultation phases, reporting, environmental assessment, publication and adoption of statutory plans, as well as the variation / amendment process, including timelines and responsibilities in relation to each core element. The manual should also provide for an ongoing and comprehensive monitoring and implementation regime in relation to the policy objectives set out in statutory plans. The focus should not only be on the application of the requirements of the legislation and statutory guidance, but also on good professional and operational practice.

Recommendation 5 – Development Plan Monitoring and Implementation

The Council should commit appropriate resources to ensuring that strategic data collection and analysis takes place in relation to the implementation of development plan objectives. The utilisation of strategic data should be a permanent function of the planning department - before, during and after the plan-making process – and should extend to the capture of data on residential and economic development activity, not only to address plan monitoring requirements, but also to contribute to the development and implementation of other strategic projects and policy initiatives. Ensuring that monitoring and analysis is conducted with adequate expertise will necessitate the ongoing availability of a GIS resource to the planning department, which could be realised through new or shared resources, while attention should also be given to the upskilling of staff within the department (as part of any learning and development strategy).

No.	Recommendation	Grading	Responsibility
3	Forward Planning Work Programme	High	Director of Services
4	Procedures Manual for Plan-making	Medium	Senior Planner
5	Development Plan Monitoring and Implementation	Low	Senior Planner

5 Architectural Heritage



County Roscommon has a rich history in terms of architectural heritage, consisting of not only grand structures such as demesne estate houses but also vernacular architecture such as thatched cottages and rendered stone buildings which form the streets of the many towns and villages across the County.

There are 599 structures on Roscommon County Council's Record of Protected Structures (RPS), which forms a volume of the county development plan. The RPS has been updated over a number of development plan cycles, with the most recent update conducted during the current development plan making process. Policies are contained in chapter 9 of the county development plan, which support the protection and enhancement of structures listed in the RPS.

There are six architectural conservation areas designated in the county development plan, the boundaries of which are all mapped and available for viewing in the plan, as well as on the Council's open data section of the website. Details in relation to each architectural conservation area are included in chapter 9 of the development plan. Relevant policies are included in the plan in relation to the protection and enhancement of conservation areas.

The local authority also has responsibility for ensuring that owners carry out certain works to ensure the protection of protected structures and has other powers to secure protection, including compulsory purchase order powers. Works are only exempt if they do not materially affect the character of the structure or any element that contributes to its special interest. Section 57 of the Act allows owners to request the local authority to declare the type of works that are exempt.

The delivery of this function in a comprehensive and consistent manner can be an intensive one, which may require specific and specialist expertise, particularly in the assessment, promotion and administering of grant schemes as well as the work involved with public engagement and development management.

Whilst this may be appropriate to manage specific architectural heritage projects as they arise, the day-to-day operations of the architectural heritage and conservation function is one where the Council must be proactive.



Boyle Abbey, Co. Roscommon

General Systems and Procedures

The Council has advised that there is no procedural manual in place for the review of the RPS, in terms of additions and deletions. During the most recent review of the RPS, which was carried out during the development plan making process, each structure on the RPS was inspected by planning department staff members. This project was approached in a comprehensive manner and required significant focus from all relevant staff members over a specific period. The survey work culminated in 13 structures being removed from the RPS. In order to inform property owners of the proposed deletions, notifications were sent via registered post to the property owners, and the proposed deletions were identified in the draft RPS that was published as part of the draft development plan. Following the adoption of the development plan, this information remains available to view on the Council's website.

The designation of architectural conservation areas is a responsibility of the Council's forward planning team and is carried out during the development plan making process.

There is no dedicated in-house expertise to review and comment on planning applications relating to protected structures or sites located within conservation areas, or to review the preparation of the RPS and identification of architectural conservation areas. The heritage officer, whose role is broad ranging and includes working with other Council departments, assists the planning department in developing policies promoting natural and built heritage. When requested, the heritage officer provides input / advice on planning related matters including attending pre-planning consultations and planning applications.

The development management team process section 57 declaration requests, with the individual declaration requests assessed by the relevant area planner. A template is used by the relevant case planner to aid in the completion of the assessment for the section 57 declaration.

Section 59 and section 60 notices require works to be undertaken in relation to endangerment or restoration of protected structures. While there is no formalised process in place for the identification and referral of endangerment / restoration concerns, the Council has advised that in situations where it becomes aware of such issues, external conservation expertise may be procured in advance of the serving of a Section 59 notice. However, there have been no relevant cases in the last six years whereby the statutory provisions of sections 59 and 60 of the Act were used.

In view of the existing stock of built heritage and noting that the most recent review of the RPS incorporated deletions only, this raises a question in relation to the effective use by the Council of this particular piece of legislation.

Another key function in relation to architectural heritage is the approval of grants under the Historic Structures Fund and the Built Heritage Investment Scheme, which is carried out by the heritage office. Funding as approved under these schemes is set out in Table 5 below:

Built Heritage Investment Scheme	No. of grant approved	Value (€)
2021	9	72,000.00
2022	9	64,851.00
2023	16	102,984.00

Historic Structures Fund	No. of grant approved	Value (€)
2021	3	46,000.00
2022	2	31,000.00
2023	4	107,800.00

Table 5 | Approved heritage funding by Roscommon County Council

The monitoring of the effectiveness of these funding streams is important with respect to promoting the protection of historic structures, best conservation practice, adaptive reuse and sustainable development in line with national policy.

Public Engagement

The public play an important role in relation to architectural heritage conservation. Under the heritage section of the Council's website, there is guidance and documentation in relation to architecture heritage is available for members of the public. This includes details in relation to the Built Heritage Investment Scheme and the Historic Structures Fund. Information is also provided in relation to listings of private conservation architects (via the RIAI website), advice on care and conservation of historic and vernacular buildings, advice on tradition building skills and thatch buildings (via the Heritage Council website) and advice on protected structures and planning (via the OPR website). In addition, the planning section of the website provides a link to the county development plan webpage and the RPS.

Currently, each of the structures as contained in the RPS are mapped onto an online map viewer on the Council's website (on the interactive zoning maps which are found via the 'search a planning application' under the planning tab). The designated architectural conservation areas can also be viewed on these maps, (however these maps pertain to the previous development plan).

Aside from the promotion of the various grant schemes by the heritage office, the Council's primary mechanism for general public engagement in relation to architectural heritage and conservation is through public consultation as part of the development plan review process and the development management process.

Performance Rating and Recommendations

Given the recent effort that went into a successful update of the Record of Protected Structures, the Council's delivery of its architectural heritage conservation responsibilities can be considered **satisfactory** to this point in time. However, in the absence of dedicated resources to ensure the function is being delivered on a proactive and consistent basis, it is considered that action must be taken to mitigate against the risks posed in terms of ensuring that Roscommon's architectural heritage is successfully protected on an ongoing basis.

While the addition of a conservation officer to the staffing of the planning department would be optimal, notwithstanding current resourcing issues, responsibility for the oversight and delivery of the Council's architectural conservation duties should be assigned to a dedicated role within the department. The designation of a role with specific responsibility would provide for leadership, proactivity and the development of greater expertise in the coordination of architectural heritage duties. Arising from this, formal procedures should be developed by the designated architectural conservation lead for:

- updating the record of protected structures and providing that additions / deletions are implemented as ongoing necessity requires (and not just in the context of development plan preparation / reviews);
- coordination of conservation input into planning applications and other Council projects;
- surveying of buildings at risk with a programme for taking action, as required;
- the use section 59 and 60 notices, as required, and integrate enforcement and ongoing survey and monitoring for conservation of protected structures; and,
- proactive engagement with owners / occupiers of protected structures, and any required updating of the Council's website; etc.

Recommendation 6 - Architectural Conservation Management

Responsibility for the oversight and delivery of the Council's architectural conservation duties should be assigned to a dedicated role, at an appropriate level. Coordinating with the resources of the planning department, this individual should provide leadership in ensuring that architectural conservation duties are delivered proactively. This architectural conservation manager should oversee the development, implementation and monitoring of procedures in relation to the proactive delivery of architectural conservation duties by the wider planning department.

No.	Recommendation	Grading	Responsibility
6	Architectural Conservation Management	High	Director of Service

6 Land Activation and Projects



The Council's utilisation of the various mechanisms available for land activation and special projects are delivered on a cross-departmental basis with the various departments (regeneration, community, housing, road) overseeing particular initiatives. This is illustrated in Table 6 below.

Policy/ Regulatory	Department	Delivery/ Activation	Department
Planning Policy	Planning	Town Centre First projects	Regeneration
Vacant Site Levy	Planning	Public realm projects	Community
Residential Zoned Tax	Planning	Town and Village Regeneration Projects	Roads
Development Contributions Initiatives	Planning	Derelict sites and dangerous places remediation	Housing
Croi Cónaithe	Housing		
Derelict Sites Act	Housing		
Town Centre First	Regeneration		

Table 6 | Roscommon County Council's delivery of land activation mechanisms

Regeneration Team

Roscommon County Council established a dedicated regeneration team in 2019, sitting in the Regeneration, Economic Development, Town Centre First, Community, PPN, Tourism & Heritage directorate. The regeneration team is led by a senior engineer, who reports directly to the director of services. In addition, the team includes a town centre first officer, two senior executive engineers, two executive engineers, a technician, two senior staff officers and a clerical officer. The Council's heritage officer also sits in this department. The team previously included a planner but a lack of resources in the planning department necessitated the recall of this resource. The team's key responsibilities include:

- preparation of applications for URDF and RRDF funding;
- successful URDF and RRDF project implementation;
- preparation and implementation of Town Centre First plans;
- engagement with communities on amenity action plans and masterplans;
- collaborating interdepartmentally in relation to infrastructure projects (e.g. public realm); and,
- developing public realm plans and streetscape enhancement and regeneration plans.

The regeneration team conducts significant public consultation through representative Town Teams that have been established for six towns, namely Boyle, Strokestown, Roscommon Town, Ballaghaderreen, Castlerea and Monkland.

Through the work of the regeneration team, Roscommon County Council has progressed a number of projects utilising funding available through the URDF and RRDF. Approximately €15.3 million in funding for urban regeneration and development projects in Roscommon Town under the URDF funding schemes since 2018 has been secured. Matched funding of 25% has been provided by the Council, bringing the total project spend to €20.1 million. In relation to projects in County Roscommon, the RRDF has provided funding of €24.5 million for 11 projects worth over €31.7 million.

The regeneration team has produced a county-wide map that identifies all projects that the Council are involved in, as well as indicating the overall project costs and funding amounts provided by the Council to deliver the projects. It is clear that a countywide approach has been taken to regeneration projects with small villages being targeted for significant regeneration projects as well as the larger towns. It would be beneficial for the Council to investigate the publication of a GIS enabled map (similar to that on the URDF project tracker website¹⁹) to monitor project progression on all existing and proposed regeneration projects in the county against policy objectives, which can be updated regularly.



Public realm works in Roscommon Town

Housing Department

The Council's housing department also play a role through their management of the Derelict Sites Register and grants for vacant / derelict houses. The housing department has a procedures manual in place to assist staff that includes reference to standard forms and notices, signposting to statutory provisions in relation to the serving of notices, the process for dealing with public submissions, as well as referencing legal advice relevant to the process. However, the manual does not include a clear procedure in respect of the collection of annual levies.

The list of properties on the Derelict Sites Register is available on the Council's website. The sites have been entered on the Register between 2018 and 2024. The Council has advised that in 2022, 55 inspections in respect of derelict sites were undertaken. This figure reduced to 43 in 2023. There were 36 properties on the Register at the time this review was being conducted.

Notwithstanding the classification difference between a vacant and derelict unit (as per the meaning under the Derelict Sites Act 1990), this would seem to be a very low level compared to the analysis carried out by the Northern & Western Regional Assembly in 2022,²⁰ which recorded a dereliction and vacancy rate of 4,090 residential units and 417 commercial units. These figures suggest that the Council should place a higher priority on the utilisation of the Derelict Sites Register. There is clear potential for widening the scope for the Register to more appropriately reflect local conditions and to put in place intervention measures to gain control, or encourage the activation of, key opportunity sites identified in the development plan process, with the planning department taking on a more proactive role.

¹⁹ DHLGH, '[URDF project tracker](#)'. (2024).

²⁰ NWRA, '[Regional Vacancy and Derelictions Analysis](#)'. (2022).

The housing department is also responsible for the management and payment of the Croí Cónaithe property refurbishment grants. At the time of the review process, 147 grant applications had been approved (equating to €8.4 million), with 11 paid out. While the high resourcing input required to administer the initiative was highlighted, the Council considers that the grants are a valuable tool for addressing vacancy and dereliction. Delivery of the scheme should be monitored with a view to providing a clear evidence base with regard to impact and outcomes from the Croí Cónaithe initiative.

Role of Planning Department

The county development plan contains policies and objectives relevant to land activation and regeneration and identifies a number of 'opportunity sites' in the larger towns of Roscommon, Ballaghaderreen, Castlerea, Elphin and Strokestown. The plan also contains a section entitled 'addressing depopulation and vacancy and incorporates a policy approach to promoting regeneration and rejuvenation in the towns, in accordance with national and regional objectives.

The plan also includes policies to increase residential development in town centres by encouraging and promoting the adaption of vacant retail / commercial buildings for residential use; encouraging development on infill sites, brownfield lands and lands identified on the Vacant Sites and Derelict Sites Registers; and supporting the conversion of upper floors to residential within the town centre.

Fundamentally, through its core strategy, the Plan establishes housing delivery targets for the county. As already noted, there is an expectation that 392 residential units will be delivered annually, between 2022 and 2027, in Roscommon. As previously noted, planning permissions for 152 residential units were granted in Roscommon during 2023. This is indicative of both the current prevailing market conditions in the County along with the challenge the Council is facing in meeting its targets in the short-term. Furthermore, the fact that 75 of these units were within multi-unit developments demonstrates the acute challenges facing the Council in terms of land activation and promoting compact development on brownfield sites.

As noted already in this report (cumulating in Recommendation 5), it is important that the implementation of Development Plan policy objectives is monitored and, that a robust evidence base of strategic data is available to the Council. This point is brought into clear focus in relation to delivery on the various activation policy objectives where a variety of initiatives and mechanisms are being used, and interacting, with a view to bringing about the Council's overall aims to reduce vacancy and dereliction, ensure compact urban growth and adequate housing supply. Monitoring however, should not stop at the Development Plan policy objectives. A systematic approach to monitoring barriers to land activation, as well as priority sites for land activation should to be developed by the Council.

In terms of direct responsibility for land activation measures, the planning department's forward planning team manages the evaluation of sites in the context of the Residential Zoned Land Tax (RZLT), while sites on the Vacant Sites Register are managed by the technical hub. The process for the Vacant Sites Register involves initial site assessment through to notifications, valuations and annual correspondence in respect of the levy due. A vacant site assessment report template has been developed which assists in ensuring consistency of approach in the process of entering a site on the Vacant Sites Register. However, there is no current strategy in place regarding the collection of unpaid levies. The Council recognises that such a strategy is required and intends to mandate the finance department with responsibility to pursue unpaid levies.

There are 10 properties currently listed on the Register, which is a reduction from the 26 that were listed in 2019. The Council has been diligent in undertaking annual survey and evaluation work in relation to vacant sites. In addition, an annual notice of demand (in respect of levies owing) is issued to the relevant landowner. Such procedures would appear to have aided in reducing the numbers of properties on the Register.

Maps showing the site locations are available for public viewing on the Council's website along with general relevant information on vacant sites. The open data portal on the Council's website identifies 72 records, however this seems to capture lands that are zoned 'residential' or 'regeneration' as per the county development plan rather than those specifically identified on the Vacant Sites Register. The planning department should ensure clarity in this regard to ensure that policy implementation is monitored and presented appropriately.

The Council's most recent return (June 2024) details a total value of sites liable to Vacant Sites Levy in 2023 at €1,450,000.00, with demands made in respect of all 10 sites equating to €101,500. At the time the return was completed, payments had been collected in respect of 2 sites, 32% of the total amount levied for 2023. Since 2019, the Council has advised that levies to the value of €100,275 have been paid to date, with levies to the value of €578,550 remaining outstanding. These figures underscore the need for the Council to implement a strategy to recoup outstanding amounts owed.

With regard to the RZLT, information on the process is available on the Council's website, with details of how submissions can be made, a frequently asked questions section and a template to facilitate written submissions. The Council prepared and published a draft RZLT Map that was finalised in February 2024. The Council will continue to review the RZLT Map annually, as required, however there is no process manual in place yet setting out procedures for site assessment, digitisation and the preparation of maps and conduct of public consultation.

The annual draft map for 2025 includes mixed-use zoned land in the larger settlements. However, it is noted that the application of the RZLT in some instances is located on lands which are at a remove from the town centre core (for example in Castlerea), notwithstanding the zoning of 'opportunity sites'²¹ within the core town centre, which appear to be vacant. This would appear to be a missed opportunity by the Council to apply the RZLT measure as a land activation tool within the town centres.

It is also worth noting that the planning department's current Development Contribution Scheme, updated in 2020, provides for full or partial exemptions to promote certain categories of development, including:

- 50% reduction for development of a site on the Derelict Sites Register;
- 100% exemptions for development on brownfield zoned sites; and,
- a graduating scale of reduced development contributions (75%, 50% and 25%) for commercial development occurring in various town centre use zones.

In addition, the Council has noted the benefits of the Development Contribution Waiver Scheme²² in encouraging land activation and housing delivery. At the time the review was being prepared, successful applications had been made in respect of 40 dwellings amounting to a total value of €150,400.

One of the most important tasks for the planning department in land activation is to provide a co-ordination and oversight role between various Council departments to ensure that consideration is given to the development of places as a whole, rather than development in a piecemeal fashion. The planning department can ensure that the concept of 'quality place-making', the importance of which is outlined in Chapter 4 of the County Development Plan, is embedded in future development proposals.

Performance Rating and Recommendations

While the establishment of a dedicated regeneration team within the Council has provided a strong basis for accessing various funding streams, including the URDF and RRDF, to deliver capital investment projects, in the absence of a pivotal role for the planning department, the Council's overall approach has neglected the fundamental goal of land activation. This is evident in the significant gap between expected housing need, housing delivery and planning permissions granted. On this basis, it is considered that the Council's delivery of its land activation responsibilities is **unsatisfactory**.

It is important to note that this assessment is not based on the performance of the planning department but is more so based on the limited role that the Council's planning experts perform in relation to promoting the land activation and compact growth agenda.

As acknowledged, the establishment of a dedicated regeneration team has been a positive move. The Council's overall approach to land activation could be strengthened by providing for an increased role for the planning department in the design, implementation and monitoring of regeneration initiatives and in ensuring that implementation is designed to promote land activation objectives.

Designating the department's senior planner with a role to drive collaboration across the various operational areas of the Council could generate increased synergy between the various tools at the Council's disposal (from levies to development contributions to regeneration initiatives).

²¹ The County Development Plan identifies the zoning of 'Opportunity Sites' to primarily accommodate residential development

²² Ref. Circular Letter PL 08/2023

The recommendations already made in this report, as well as those in subsequent sections, include actions that would free the senior planner from responsibility for a volume of day-to-day tasks that could be delivered at other levels.

This would have a benefit for the wider Council in that the planning department could have a more strategic and innovative role with regard to the delivery of development initiatives. There are also important linkages to be created between project development, implementation, monitoring and evaluation in the context of the established objectives of the county development plan.

Enhanced coordination should also see the planning department working cross-departmentally in relation to measures such as the Vacant and Derelict Sites Registers, RZLT, etc., including the collection of levies, and the integration of these tools with other land activation initiatives.

Furthermore, building on existing positive public engagement in Town Teams, there is an opportunity for an inter-departmental approach, including the availability of data and analysis, to form a basis for greater public engagement in relation to activation measures. This could include the production of spatial data and other information monitoring the success of implemented measures and identifying the potential of further development opportunities.

Recommendation 7 – Coordination of Activation Measures

Working with the environment and housing departments, the planning department should proactively seek to coordinate action to address derelict sites with other land activation measures.

Appropriate structures, whether a working group or other reporting arrangements, should be created within the Council to enable the planning department to have a proactive role in the coordination of the various regeneration, land management and activation tools available. Enhanced coordination arrangements should include planning leadership at a senior level to ensure strategic planning input from project design through to monitoring and evaluation.

No.	Recommendation	Grading	Responsibility
7	Coordination of Activation Measures	High	Director of Services



7 Development Management



The range of tasks assigned to development management teams across local authorities are generally standardised nationally. These include the obligations to ensure all steps in the process are managed, recorded and registered in accordance with specific legislative requirements set out by the Act and the Regulations. The development management team in Roscommon County Council have responsibility for:

- processing and assessing of planning applications;
- section 247 pre-planning consultations;
- preparation of AA and EIA screening reports;
- processing and assessing of Section 57 applications;
- issuing Section 5 Declarations;
- assessing Section 96 Certification of Exemption applications;
- assessments of notifications as submitted under Article 10(6) of the Regulations;
- processing planning compliance submissions;
- issuing observations in relation to decisions appealed to An Bord Pleanála;
- issuing of Section 254 Licences in relation to appliances, cables, street furniture, telecommunication infrastructure etc. on public roads;
- assessment of licence applications in respect of events / control of funfairs; and,
- compiling monthly statistical returns to CSO and central government.

Development Management Team

As noted in Chapter 2, the development management team comprises a designated cohort of 5 planners and a technician, supported by an administrative team of 9 persons (8.6 FTE), who collectively deliver this statutory function. At the time of the review, there were two vacancies, at executive planner and assistant planner level (a 40% reduction in capacity in terms of planners).

A senior executive planner leads the team, and casework meetings, which include the department's senior planner, are intended on a four-week rotational basis. The team is structured on a planning area basis - Roscommon North and Roscommon South (rather than by Municipal District). Meetings between the team members and the senior executive planner occur on an informal, unscheduled basis within the open-plan set up of the office.

The validation of applications is carried out by the technician and overseen by the senior executive planner. The technician also undertakes digital mapping in respect of pre-planning consultation applications, Section 5 declaration requests and enforcement cases. The technician undertakes site inspections in respect of change of use notifications as submitted under article 10(6) of the Regulations. On occasion, the technician also assesses Section 5 declaration applications.

Standard Operating Procedures

There is no overall procedures manual in place for the processing of a planning application, however it is acknowledged that this is largely set out by the legislative code. Notwithstanding, the Council provided the current procedural documents that are in use by staff:

- procedures manual for the full suite of administrative functions as performed by the development management administrative team;
- pre planning procedures for major developments;
- ePlanning administrative functions;
- procedure for counter signing ePlanning files;
- validation manual; and,
- a standard template for planning application reports (including guidance on completion).

The progression of planning files is managed by the senior executive planner who keeps a record of work on hand via the publication of a 'hot list'. The list is produced primarily using data collated from the iPlan system for each planner, with compliance submissions, Section 5 declaration requests, Section 57 applications, submissions to An Bord Pleanála and Section 245 licence applications manually transcribed onto the list. The list is distributed to each planner approximately every four weeks, including the senior planner.

While the development management team is led at senior executive planner level, it is noted that the senior planner plays an active role in the day-to-day operations of the team, including the allocation of files. From a procedural perspective this would appear to create additional and unnecessary workload for the senior planner and noting that the team is already structured on an area basis - Roscommon North and South (rather than by Municipal District) - a streamlined approach to file allocation would appear prudent.

Also, at various periods it has been the department's practice that all planners' reports would be directed to the senior planner for finalisation. While this may be necessary on occasion due to staff absences, an overreliance on such an approach creates the risk of a bottleneck in terms of file progression, which not only places a pressure on the senior planner but also increases the pressure on the wider team with regard to the prompt processing of files.

Development Management Output

Planning data published by the Department of Housing, Local Government & Heritage provides details on all local authorities' outputs and allows comparison between authorities and national trends.²³ Since 2015, the volume of planning applications received in Roscommon has increased from 329 to a peak of 533 in 2021, which since reduced to 486 in 2023. This is consistent with national trends that show increasing numbers of applications since 2015, with a high in 2021, and returning to pre-Covid numbers in 2022.

Figure 3 illustrates Roscommon County Council's intake of valid applications for the period from 2015 to 2023. As a comparison with neighbouring local authorities, the 486 applications received by the Council in 2023 compares with 519 valid applications received by Westmeath County Council and 213 valid planning applications received by Leitrim County Council, whilst Offaly County Council received 552 valid planning applications that year, and Mayo and Galway County Councils received 1094 and 1598 valid planning applications respectively.

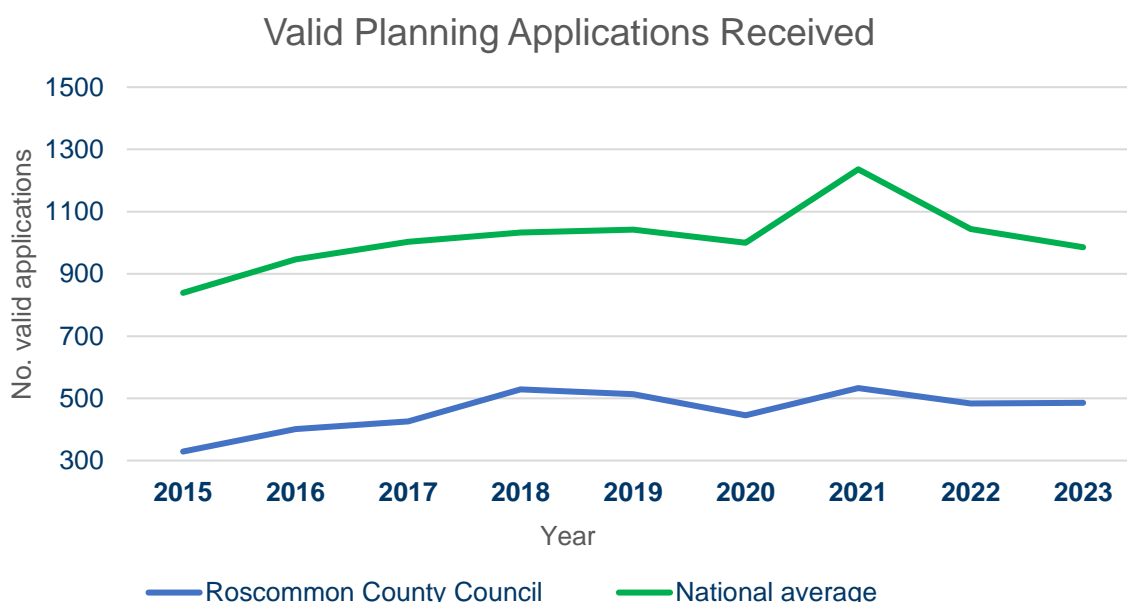


Figure 3 | Valid applications received²⁴

²³ Department of Housing, Local Government and Heritage, '[Annual Planning Statistics 2015-2023](#)', (June 2024).

²⁴ *ibid*

In 2023, planning permission for 41,225 residential units was granted in the State, this included 19,738 houses. Dublin had the highest proportion of houses granted planning permission at 24.2% (4,776 houses), followed by Cork at 13.6% (2,676 houses) and Meath at 6.5% (1,288 houses). Leitrim had the lowest proportion of houses granted permission, with just 50, followed by Roscommon with 152. As a consequence of the types of applications received, no apartment units were approved during 2023 while a total of 6 multi-unit developments were approved, accounting for 75 residential units²⁵ These figures indicate that over 50% of the residential units granted in Co. Roscommon were one-off / single dwellings.

Whilst the rate of processing planning applications is below that of the national average, it is apparent that the trend in Roscommon County Council broadly follows the national trend in terms of planning applications received since 2015

It is of note that in recent years the number of Section 5 declaration applications have increased substantially from 37 such applications received in 2022 to 106 applications received in 2023. Preliminary data from the Council indicates that this upward trend continued through 2024. The Council noted that the number of Section 5 declarations received by mid-2024 had already exceeded the previous year, with the driver being that declarations were being sought in relation to works being proposed under the vacant property refurbishment grants.

Invalidation of Planning Applications

Ensuring that planning applications include the proper documentation, public notices, the required drawings and particulars is a key requirement of the Regulations. Accurate and proper planning application documentation is very important in ensuring the correct information is available for the public and the effective assessment of applications. Accordingly, the Regulations specify strict standards that applications must reach before a planner assesses them. Where applications do not reach required standards, they are invalidated. A rigorous but fair process for the validation of planning applications is essential to the efficient operation of the development management system. An ineffective validation system can be costly for both the local authority and applicants.

As noted, in Roscommon County Council, a technician carries out the process of validating the planning applications received and mapping the sites on the digital mapping system. The technician also refers the applications to prescribed bodies, however, the planners complete the referrals to various internal departments of the Council. The validation checklist is available on the Council's website.

Over the past five years, the Council's rate of invalidation has ranged between 19% and 32% of all applications received, compared to a national average of between 15% and 20% during the same period, placing Roscommon County Council as one of the authorities with the highest invalidation rate nationally.

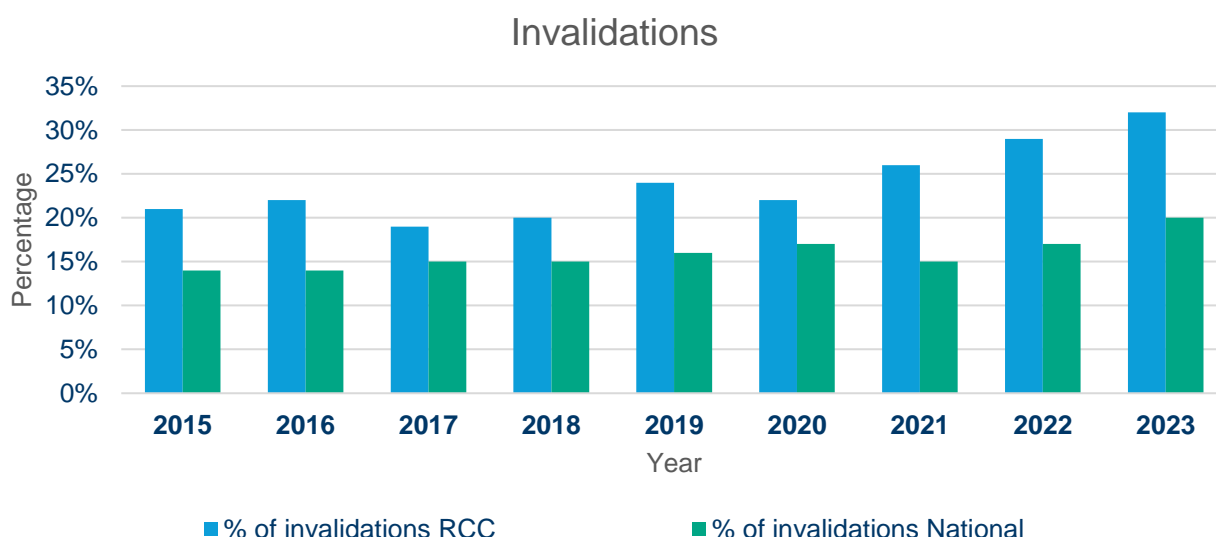


Figure 4 | Invalidation rates ²⁶

²⁵ CSO, 'New Dwelling Completions', (June 2024)

²⁶ Department of Housing, Local Government and Heritage, 'Annual Planning Statistics 2015-2023', (June 2024).

In practical terms, Roscommon’s high rate of invalidations indicates that a significant portion of planning applications received by the Council were not deemed to have met the regulatory standard to be processed, placing an additional burden on both customers and staff. In addition, such high invalidation rates create a notable degree of repeat handling. In the first instance, the application is returned to applicants before adjudication because it has failed to meet minimum statutory requirements, and the subsequent handling of the follow-on application, once the minimum statutory requirements are met.

Roscommon County Council commenced operating ‘ePlanning’ in June 2023. This online platform allows applications, and associated documentation, to be submitted electronically and removes the requirement for paper-based submissions. Between June 2023 and April 2024, 71% of planning applications received by Roscommon County Council were submitted via the online facility. In this regard, the ongoing monitoring of validation rates to ensure a consistent approach to the validation of planning applications lodged via ePlanning or at the public counter will be vital.

It is clear that the Council is conscious of its high invalidation rate, with the monthly invalidation rate being included as a standing item in the monthly management reports to the Council members. In the past, the Council engaged with agents through information workshops, however it is a concern that such workshops have not been facilitated since 2013. While it is acknowledged that preliminary data received from Roscommon County Council²⁷ suggests that the invalidation rate is improving, it is important that the Council proactively addresses this issue and urgently develops and implements initiatives designed to encourage quality applications and bring invalidation rates more in line with national trends on an ongoing and prolonged basis.

Decisions Granted or Refused

The percentage of planning applications resulting in a refusal of permission by Roscommon County Council decreased from a high in 2015 to slightly below the national average between 2016 and 2019. However, since 2020 the refusal rate has been slightly above the national average, increasing to 14% of applications in the year 2022 (and as such, returning to close to the high refusal rate recorded in 2015).

The Council has advised of certain trends with regard to the refusal rate, with the primary reason for refusal of planning permission attributed to issues pertaining to the safe treatment and disposal of wastewater arising from an un-serviced rural dwelling (and associated compliance with the 2021 EPA Code of Practice for Domestic Waste Water Treatment Systems). Non-compliance with rural settlement policy as contained in the development plan and siting and design issues were also cited as being notable in terms of the reasons for refusal of planning permission.

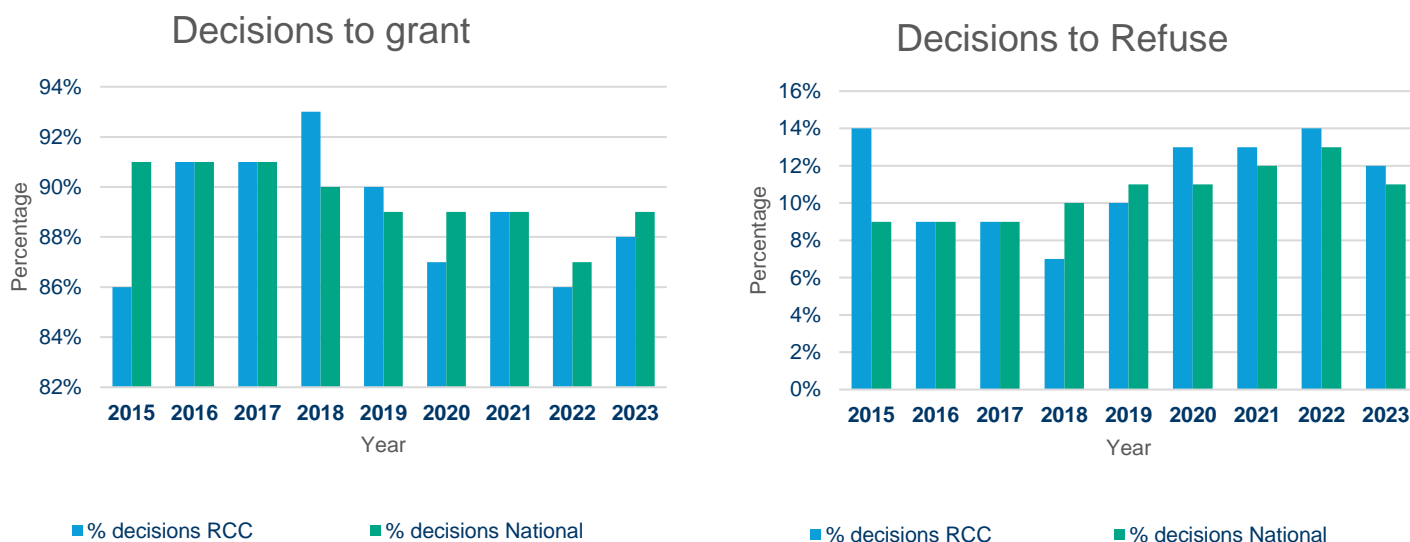


Figure 5 | Decisions to Grant and Refuse²⁸

²⁷ Preliminary data received from Roscommon County Council on the invalidation rates for 2024

²⁸ Department of Housing, Local Government and Heritage, ‘Annual Planning Statistics 2015-2023’, (June 2024).

Decisions made within Eight Weeks

Figure 6 below illustrates the percentage of decisions that were made by Roscommon County Council within eight weeks, each year since 2015. The Council's rate was generally in line with the national average during the period from 2015 to 2020. However, in 2021 the Council's rate dropped below the national average, and this trend continued in 2022 and 2023. The low rate intensified so that by 2023 less than 35% of decisions were made within eight-weeks, compared to a national average of 62%. This was one of the lowest rates reported by the Department of Housing, Local Government & Heritage (DHLGH).

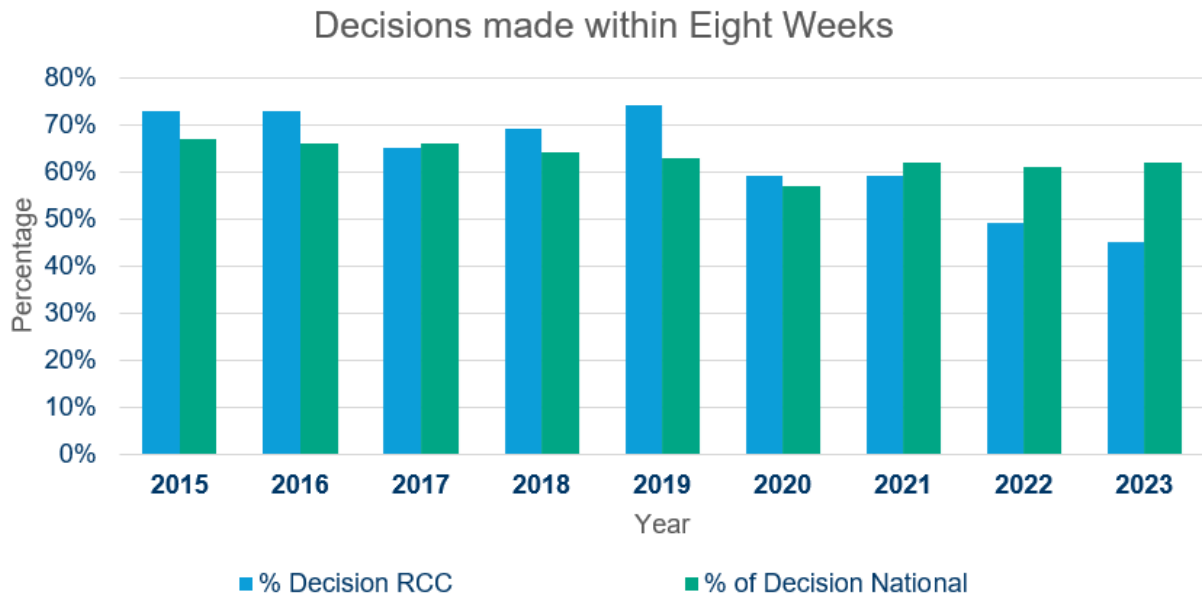


Figure 6 | Decisions made within eight weeks²⁹

Related to this, figures as compiled by DHLGH also report that during 2023 Roscommon County Council had the highest rate nationally for seeking further information from planning applicants, a procedure that extends the timeframe in which an application can be determined. Furthermore, based on information provided by the Council, it would appear that subsequent clarification requests were made in relation to 20% of the cases that had already been subjected to the further information procedure.

Seeking further information from applicants is a mechanism that can be used in a sensible manner to assist quality decision-making. However, a trend whereby further information was requested in up to 60% of applications (as was the case in 2022 and 2021), and with up to 20% of those responses also leading to clarification requests, indicates the high level of resources being expended dealing with applications. Such a level of further engagement with applicants creates a burden for the planning department, further eroding capacity, but also has an impact for customers. Improvements could be yielded through proactive engagement with agents to ensure that applications are prepared to a higher standard.

Appeals to an Bord Pleanála

Since 2015, the average rate of planning applications appealed to An Bord Pleanála nationally has been approximately 7%. As illustrated on Figure 7 below, Roscommon County Council's rate has consistently been below the national rate, and most recently at 5% (or 23 no. appeals) in 2022.

²⁹ Department of Housing, Local Government and Heritage, '[Annual Planning Statistics 2015-2023](#)', (June 2024).

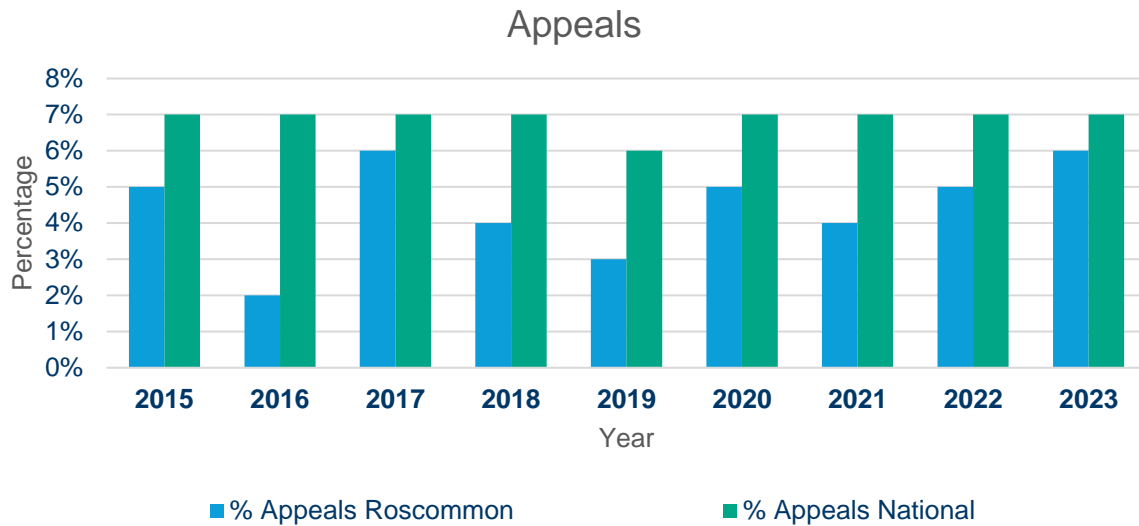


Figure 7 | Appeals to An Bord Pleanála

Reversal Rates on Appeal

The percentage of planning decisions reversed by An Bord Pleanála has varied significantly in the period 2015-2022, with a notable peak in 2017 of 60% of appealed decisions being reversed, followed 53% in 2021, though it should be acknowledged that this amounted to just 6 and 8 cases respectively. However, this reduced to zero reversals in 2022 of the 23 cases appealed to An Bord Pleanála.

A low reversal rate is generally indicative of quality decisions being made. In Roscommon’s case, the monitoring and analysis of An Bord Pleanála determinations, including discussion at case meetings, may contribute. It is further noted that the 2024 Annual Service Delivery Plan targets achieving a 0% rate for the reversal of decisions made by the Council on policy grounds. This provides a strong corporate commitment towards quality, policy based, decision-making.

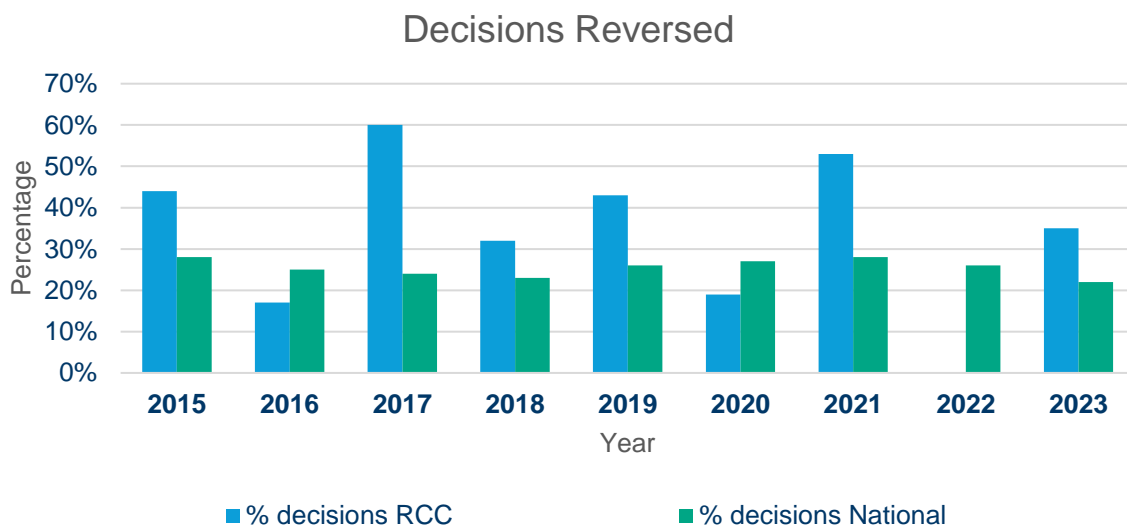


Figure 8 | Reversal rates³⁰

³⁰ Department of Housing, Local Government and Heritage, '[Annual Planning Statistics 2015-2023](#)', (June 2024).

Planning Conditions

There are advice notes (appended to the planner's report template) used by all planners preparing planning recommendations, as well as a standard manual of conditions in relation to grants of permission. The Council referenced the OPR Practice Note on Conditions as a beneficial tool in the preparation of the standard set of conditions in use.

While there is no formal written procedure for managing and recording planning condition compliance submissions, the completion of same is tracked via the 'hot list' (as referred to previously), and the Council has advised that a register is in place. The mandatory determination timeline of eight weeks for compliance submissions (Circular PL 13/2021) is calculated, and the senior staff officer manually includes the deadline on the hotlist and oversees input into the register.

From a review of a random selection of planning application files on the Council's online planning platform, it would appear that compliance submissions are scanned onto the Council's ePlan system, to the relevant planning file, and are made available to view online. Notwithstanding, it is not clear how compliance submissions are processed, referred (i.e. to internal Council departments) and completion of it is monitored, particularly those that require the written agreement of the planning authority. In this regard, the implementation of a system for the clear tracking, management and completion of compliance submissions (both those received via hard and soft copy) would reduce the risk of statutory failings.

Section 5 Declarations

In Roscommon County Council, Section 5 declaration requests are processed broadly in the same manner as planning applications, i.e. they are registered, allocated to planners and recorded on the planning register and online mapping, in line with the Council's Section 5 administrative process manual. Once received and processed, a Section 5 request is manually inserted onto the hotlist and allocated to the relevant case planner by the senior planner.

A Section 5 declaration request form is available to the public on the Council's website along with details of the documentation required for the submission of a Section 5 declaration request.

In accordance with section 5(7B) of the Act, where an authority issues a declaration, the associated documents must be placed on the authority's website for inspection and be made available for inspection / purchase for a minimum period of eight weeks. The details of any declaration issued must be entered into the Planning Register. From a review of the Council's website, a list of Section 5 declarations as issued is published, with the accompanying documentation required under the legislation. However, as the declarations are not identified by year (rather they are identified as per the reference numbers assigned to it by the Council), it is difficult to understand if the record is up to date. The planning department should consider how this information could be presented more clearly for the public.

Under section 4(4) of the Act, any development that cannot be screened out for appropriate assessment (AA) and or an environmental impact assessment (EIA) cannot be exempt from the requirement for planning permission. When assessing a request for a Section 5 declaration, a screening for AA and EIA must be undertaken, where appropriate. This requirement is further highlighted under section 5(7A) of the Act which requires authorities to specify, in relation to certain categories of development, in its declaration / decision whether the development would be likely to have significant effects on the environment by virtue of the nature, size or location of such development and require an EIA.

Having regard to the above, and the increasing number of Section 5 referrals the Council is processing, it is recommended that a process manual is prepared, which encompasses both the administrative and technical aspects of the processing and issuing of a Section 5 declaration, in accordance with the statutory requirements. Such a manual would include, but is not limited to, the tracking of timelines for the completion of a Section 5 declaration and the use of a standardised template for the planning assessment, which includes an AA and EIA screening template. In addition, the manual should also include the provision of a timeline for the publishing of the Section 5 applications and associated documentation on the Council's website. The publication of Section 5 applications and associated declarations should include a clear referencing system, such that members of the public can easily identify each application / decision. A step should also be included where such determinations are referred to/appealed to An Bord Pleanála to ensure any such determinations are tracked and recorded.

Section 247 Pre-planning Consultations

Section 247 pre-planning application consultations are an important service within the planning process, allowing the local authority to highlight the issues and considerations relating to a particular development to a prospective applicant. Previously the OPR undertook research in relation to 'Pre-Application (s247) Consultation Services'.³¹ It outlines the characteristics of a good quality pre-application consultation system, which includes public accessibility, clarity of advice and efficient and effective use of resources.

The information provided indicates that the Council receives in the region of 240 pre-planning consultation requests annually. Pre-planning consultation request forms are available on the Council's website. Upon receipt of a pre-planning consultation request by the planning department, the request is recorded on a register and classified as a proposal for either a major or a standard development before being assigned to a case planner. Requests deemed to be in respect of major developments are retained by the senior planner. Once the request has been registered, it is given a unique reference number and is mapped on the Council's GIS.

Depending on the nature of the proposal, pre-planning consultations with members of the public may be held over the phone, online and face-to-face. Pre-planning consultations in relation to major development proposals generally involve an official meeting between several departments, with the senior planner acting in the capacity of chair of such meetings.

A record is created in respect of all pre-planning consultations, using a standardised template, which is placed on the relevant file once an application is received. While noting that a record of all such consultations is maintained, which identifies the date a meeting was allocated and the date of the meeting was held, it does not appear that the department maintains a consolidated list of pre-planning consultations that would allow the calculation of waiting times.

While the planning department has established a procedure in relation to pre-planning, regrettably, at the time the review process was being conducted, the Council had suspended its consultation service for the majority of potential planning applicants.³² The department's rationale was that, in light of the current resource constraints, this area of activity would be deprioritised to facilitate the Council's planners to focus on planning applications and other work. The department indicated that the service would be reactivated when new staff members are appointed. While noting the rationale behind the suspension of the service, it is detrimental tenable to pause the provision of the pre-planning service when critical capacity constraints present.

The provision of a pre-planning consultation service is a statutory duty, one that is expected to be facilitated within four weeks. The suspension of the service, depriving potential applicants of the opportunity to engage with the Council, brings the issues being experienced within Roscommon County Council's planning department into sharp focus.

While the pressure on the ability to deliver an effective pre-planning consultation service when resource constraints emerge is acknowledged, it is essential that contingency is established to ensure that such a scenario does not present into the future. In establishing such contingency, the Council should explore alternative, or additional, methods of satisfying its statutory obligations with respect to pre-planning consultations, such as the development and implementation of an online pre-planning platform, which, by harnessing the potential of GIS, can produce an immediate pre-planning report for an applicant / agent. Such ICT enabled solutions can ensure a balance to the level of service being provided that may not be as intensive as the provision of bespoke or 'face-to-face' consultations. Learnings from other local authorities that have successfully launched such online services may be garnered by the planning department in this regard.

Section 254 Licences

The Council has a procedures document in place in relation to conducting the Section 254 licence process. While all such applications are submitted through the planning department, the department deals exclusively with applications in respect of outdoor dining and telecommunications infrastructure, while the roads department deals with scaffolding licenses. Relevant applications are forwarded to the senior

³¹ Office of the Planning Regulator, '[Case Study Paper CSP04 'Pre Application \(S247\) Consultation Services'](#)', (2021).

³² It is acknowledged that the Council has since advised that the pre-planning consultation service has since been reinstated.

planner / senior executive planner for allocation to case planner. An application form in respect of a Section 254 licence is available on the Council's website.

The Council has indicated that the majority of such licence applications pertain to telecommunication infrastructure and construction infrastructure (for example the erection of scaffolding). Unlike a number of other local authorities, the Council indicated that there was no notable increase in street furniture (to facilitate outdoor dining) applications made to the Council, following the implementation of a fee waiver in respect of same under the relevant Regulations³³, as well as circular letters PL06/2021, PL 04/2022, PL07/2023 and PL03/2024.

Online Planning Services

The Council's website is the principle means by which members of the public, agents, applicants and other stakeholders can engage with the development management process. Like all other local authorities, Roscommon County Council's planning files can be accessed online, through the LGMA's planning inquiry platform (iPlan).

Under the Regulations, weekly lists of planning applications are expected to be published to the website within specified timeframes. From a review of the website, it was observed that there are inconsistencies with the publication of the weekly lists on the website. It is important that the Council ensures that there are systems in place to ensure the consistent updating of the website, including publication of the weekly planning list.

Since July 2023, planning applications can be submitted to Roscommon County Council online following implementation of the ePlanning portal. As previously noted, there has been a substantially high uptake of this service since its implementation in Roscommon. While the Council highlighted positive aspects with regard to the introduction of ePlanning, such as the reduced timeframes within which application documentation becomes available to the public, the unexpected resource intensive nature of the initiative has also been noted.

Upon commencement of the ePlanning platform, the planning department developed new procedures in relation to the processing of online applications and submissions, as well as the referral of completed planning assessment reports to the relevant senior executive planner and the senior planning for counter signing.

Environmental Assessment

Development management related environmental assessments are generally carried out by the relevant case planner. There is no designated environmental assessment officer within the department. The planning department does not have a specific operational procedure for the processing of applications involving EIA and AA.

As part of this review, Roscommon County Council provided an example of a planning application which was accompanied by an EIA Report, and where an EIA had been undertaken. The submitted planner's report template includes a section in relation to EIA screening, however it is limited to identifying whether the planning application was or was not accompanied by an EIA Report. Best practice would be to include a systematic approach to screening for EIA in the report template, one that brings together the various statutory requirements in relation to preliminary examination and screening determination. In this regard, in order to avoid any potential gap in the EIA screening process, the Council should develop further this section of the planner's report template, having regard to the legislative requirements. The OPR Environmental Impact Assessment Screening Practice Note provides a template for EIA screening that would provide the Council with useful information and guidance.

The submitted planner's report template also provides for a section in relation to AA screening. All planning application developments are screened for AA. In certain instances, a more detailed screening report is prepared, and the Council has submitted an example in this regard. The more comprehensive screening report is included as an appendix to the planning report for the relevant application. The submitted planner's report template states that a new screening template will be developed in due course. The development of a comprehensive AA screening report template would ensure compliance with Act as well

³³ Planning and Development (Street Furniture Fees) Regulations 2024

as the Habitats Directive (92/43/EEC), the associated Birds Directive (2009/147/EC) and the Birds and Natural Habitats Regulations 2011. Similar to the EIA screening template, the OPR Appropriate Assessment Screening Practice Note would provide beneficial guidance for its preparation.

Flood risk policies and objectives within statutory development plans are the basis for considering planning applications in principle and in detail, in accordance with the 'Planning System and Flood Risk Management Guidelines'. The planning department seeks internal input from the relevant district engineer, as well as the environment department, to determine the flood risk and acceptability of any proposed surface water drainage. The submitted planners report template does not contain a section in relation to flood risk as standard, rather an analysis of a sample search of planning applications from the Council's website demonstrates that flood risk is assessed on the proposals' individual merit, which might include potential flood risk.

The Council confirmed that staff have attended training on environmental assessment matters. Given the complex and evolving nature of this area of planning practice, it is important that staff are supported to undertake training on an ongoing basis, and that the planning department has access to technical expertise for complex planning applications.

Performance Rating and Recommendations

While the quality of Roscommon County Council's decision-making is acknowledged, there are a number of ongoing areas where urgent improvement in service delivery is required. Consequently, the Council's delivery of its development management function is currently considered **unsatisfactory**.

It is clear that the Council's development management function is delivered by a skilled and resourceful team. This is evident through the quality of the planning assessment and the positive adoption of ePlanning, among other things. However, given the context of structural and resourcing deficiencies, it is also apparent that many aspects of service are not being delivered to the standards expected. Of primary concern is the Council's failure to maintain a public consultation service on an ongoing basis, however the issues associated with high invalidation rates and the extended timeframe being taken to determine most planning applications are also contributory factors.

It is recognised that the Council's development management workload has been steadily increasing over the last number of years. It is also acknowledged that this increased workload is managed in the context of increasingly complex applications, the high number of Section 5 declaration requests, and the ongoing evolution of the statutory planning code. Further, recognising the demand placed on the wider planning department through the development plan making process (particularly having regard to the whole of department input in the preparation of the Record of Protected Structures) accompanied by the absence of key technical staff, such as a conservation officer, it is clear that the development management team has been required to deliver under significant pressure in recent years.

The Council's development management function is the frontline of planning service delivery, and it is to be expected that the confluence of wider issues being experienced in the planning department will present in this context.

This report has already emphasised the need for the planning department to operate more efficiently given the limited resources available and has also indicated areas where a more strategic planning leadership role could be played for the wider benefit of the Council. Accordingly, and with an even stronger emphasis than outlined heretofore, it is essential that the planning department orient its resources and administrative procedures to deliver its development management duties more efficiently.

In this regard, it is noted that the senior planner is involved in the allocation of files across the various areas of development management (planning applications, Section 5 declarations, Section 247 requests). A delegated approach would have a benefit for the wider planning department.

Accordingly, it is recommended that all planning files be allocated at a senior administrative or senior executive planner level and that as part of the file allocation process, it is determined which cases would require the attention of the senior planner before being finalised. This new procedure should also provide for an objective that all planning reports be finalised for management approval at least a week before the required date, thereby providing administrative capacity within the team.

It is also important that the Council commits to improving its provision of public engagement. Crucially, the Council must ensure its pre-planning consultation service is consistently delivered into the future and must address any backlog as a result of pausing the service as a matter of urgency. However, a wider commitment to public engagement also offers the potential to address some of the other issues that are a drain on the planning department's capacity, such as the significant volume of invalid applications or the increased rate of further information requests issuing.

Accordingly, each planner should have a set allocation of time on a weekly basis dedicated to public engagement, which should include Section 247 consultation but also more general matters, such as dealing with phone queries or matters on the public counter. Furthermore, the department should establish a liaison group for agents that the Council regularly deals with. Workshops should be held with the agents to address reoccurring issues related to the invalidation of planning applications, further information requests, common reasons for refusal of permission, compliance with other relevant statutory codes, and any emerging relevant legislative requirements.

The preparation and implementation of a revised Section 5 declaration procedure would greatly assist in the efficient processing of the large volume of such applications and ensure that they are available for viewing by the public in accordance with the statutory requirements. The procedure should include the preparation and use of a planning report template, which ensures, inter alia, statutory EIA and AA screening requirements are addressed

While acknowledging the use of a planning application assessment template, adjustments should be implemented to ensure standardisation in relation to EIA and AA screening. The OPR practice notes in relation to both should be used as a baseline template in this regard.

Recommendation 8 – File Allocation and Processing

A new procedure should be introduced whereby all planning files are allocated at senior executive planner or senior administrative level. During allocation, it should be determined which cases are of strategic significance to require senior planner attention before being finalised. An objective should be set that all planning reports be finalised for management approval at least one week before the due date.

Recommendation 9 – Public Engagement

The Council must ensure that a full pre-planning consultation service is available to members of the public, as expected under section 247 of the Act. A time allocation should be set for planners to dedicate to public engagement activities on a weekly basis, including consultations, meetings, phone queries, face-to-face assistance, etc. An agent's liaison group should be established and a schedule of workshops conducted.

Recommendation 10 – Section 5 Declaration

The Council should update its procedures manual in relation to Section 5 declarations, to include, but not limited to, tracking of requests, a timeline for the uploading of Section 5 documentation with a clear referencing system and the use of a template for the planning assessment which includes AA and EIA screening (as referenced in Recommendation 11).

Recommendation 11 – Templates

The Council should update its planning report templates for planning applications and Sections 5 declaration requests to ensure compliance with statutory EIA and AA requirements.

No.	Recommendation	Grading	Responsibility
8	File Allocation and Processing	High	Director of Services
9	Public Engagement	Critical	Director of Services
10	Section 5 Declaration	Medium	Senior Planner
11	Templates	High	Senior Planner

8 Enforcement



As noted, the Council's enforcement function is delivered by the technical hub team. This team consists of a senior executive planner, executive planner, assistant planner (vacant at the time of the review), executive engineer and a technician, with operational support from two administrative staff. This team is responsible for all enforcement matters and also manages the Council's unfinished housing developments, taking-in-charge and the collection of unpaid levies, including unpaid development contributions.

Standard Operating Procedures

The Council confirmed that an internal procedures manual is not in place, rather there are standard protocols in place, which are understood by all officers involved in dealing with planning enforcement. Such protocols have the potential to be developed into a process manual for use by relevant staff. The Council has set out the various steps that are taken on receipt of a complaint from a member of the public (or identified by an internal source) – a new case file is created, assigned a unique reference number and inputted into the enforcement management database. Following a site inspection, the enforcement officer will assess the complaint and prepare a recommendation to progress or dismiss the case.

Presently, the Council records and tracks enforcement complaints on an in-house excel spreadsheet. However, the location of sites that are the subject of enforcement proceedings are not publicly available via a GIS interface or otherwise. As part of the Council's 'digital transformation' initiative, the planning enforcement team collaborated with the ICT department with a view to designing an enforcement case management system. Whilst this project did not advance past initial design state, it is recognised that the installation of a new digitally driven planning enforcement system is critical.

Enforcement Action and Output

Enforcement output³⁴ from 2015 to 2023 is illustrated in the graph below. The graph highlights that the total number of cases on hand grew from 55 in 2015 to 249 at the end of 2023. In essence, the on-hand caseload has increased almost four-fold over an eight-year period.

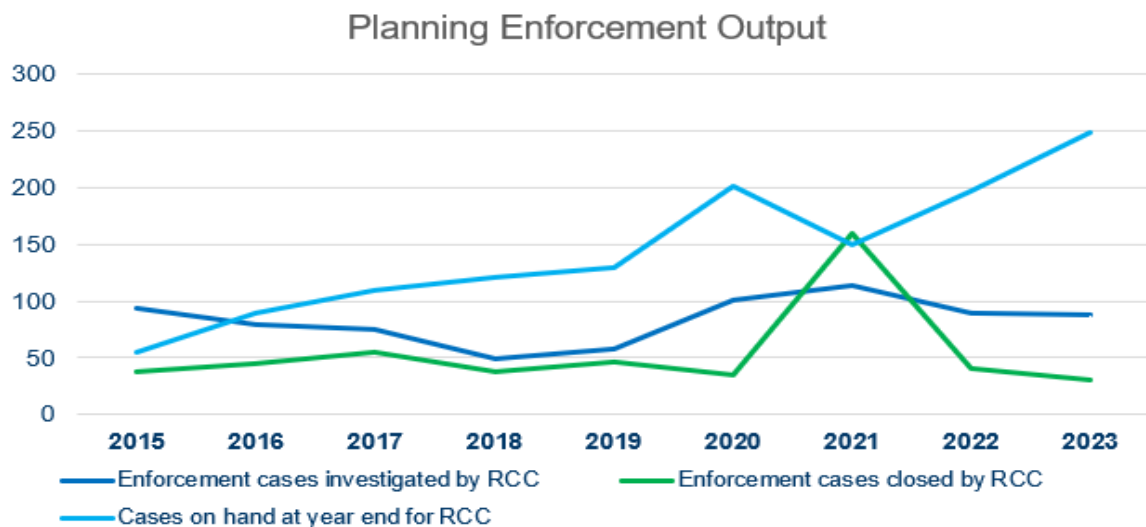


Figure 9 | Planning enforcement output

³⁴ National Oversight and Audit Commission, 'Local Authority Performance Indicator Report 2023'

Having regard to the overall statistics for enforcement, the number of cases closed year-on-year is significantly less than the number of cases investigated. The exception being 2021 when, following the re-assignment of personnel within the planning department, a concentrated effort was made to close historical cases. This targeted action resulted in the closure of 160 cases during 2021. However, over the following two years the number of cases on hand again increased (by over two-thirds) given that the closure rate dropped back to 41 and 30 in 2022 and 2023 respectively, while new caseload continued to grow.

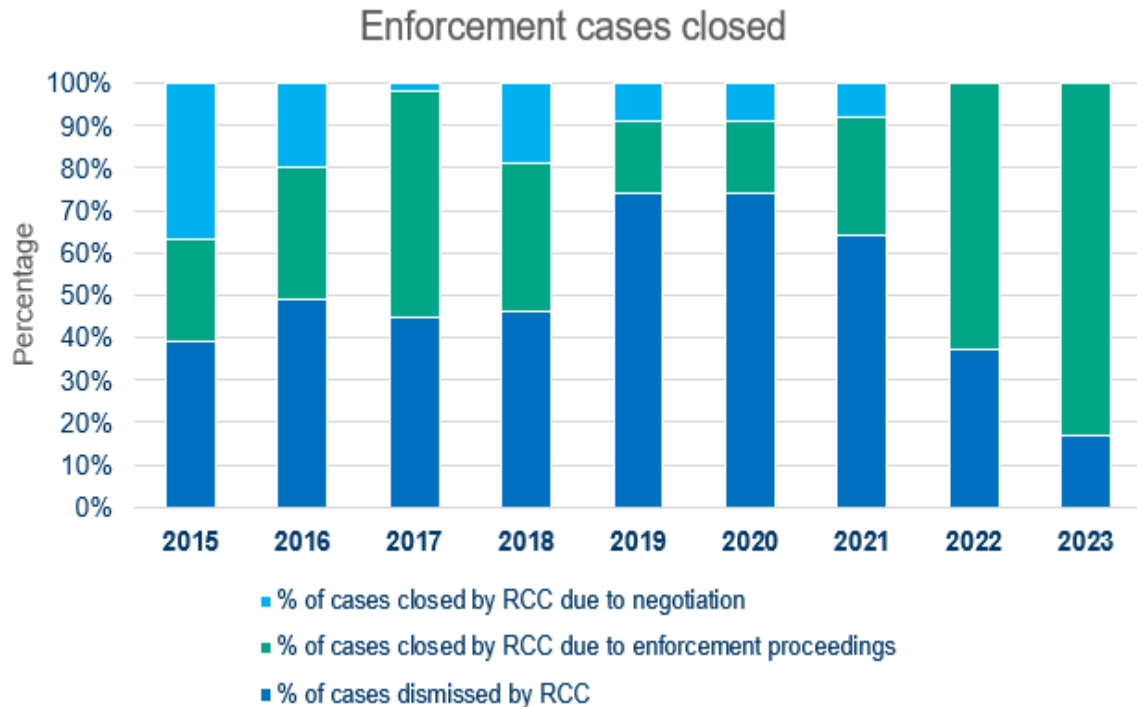


Figure 10 | Enforcement cases closed

Figure 10 below, which is also based on NOAC statistics, illustrates the variation in trends as to how cases were closed over the same period between 2015 and 2023 (the applicable definitions are cases being closed by dismissal as being trivial, etc. by negotiation, or closed following enforcement proceedings). At the general level, these figures show that enforcement proceedings are often necessary to ensure a successful outcome, with negotiation proving to be a less successful pathway over time (decreasing from a high of 37% in 2015 to 0% in recent years).

Activity in relation to enforcement during the period from 2021 to 2023, is illustrated in Figure 11. Over this period, the number of warning letters issued increased, while the number of enforcement notices served decreased. Legal proceedings initiated by the Council during this time have remained at low levels, with one case initiated in 2022 and 5 in 2023.

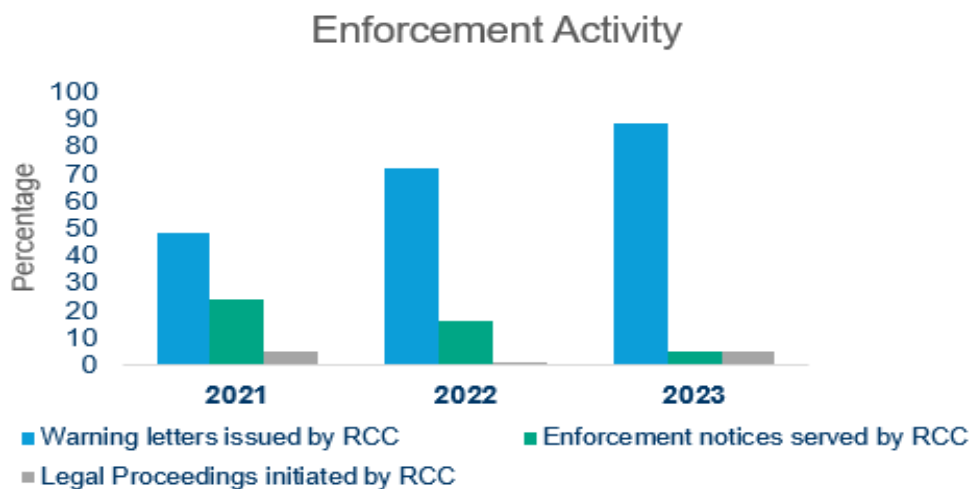


Figure 11 | Enforcement activity 2021-2023

Information provided by the Council illustrates that the number of site inspections undertaken has decreased year-on-year during the period 2021 to 2023, from a high of 305 inspections undertaken in 2021 to 154 taken in 2023. Whilst vacancies in the enforcement team may be a factor in this, it is important that this trend is managed and reversed given the level of enforcement cases on-hand.

Public Engagement in the Enforcement Process

The Council's website is the primary communication channel for members of the public raising planning enforcement complaints in Roscommon. However, the website provides limited information in relation to the definition of unauthorised development, complaints procedures or the length of time taken to investigate a complaint. The Council accepts enforcement complaints in writing and by email, with a complaint form and a dedicated email address provided on the website.

While useful, the information available on the website could be expanded upon, e.g. information on the Council's enforcement policy and practice statement could be published on their website. Such a practice is promoted in the OPR Practice Note on Enforcement. There are other useful resources available that could be usefully included on a local authority planning enforcement website page, for example the OPR Planning Leaflet no. 6 'A Guide to Planning Enforcement in Ireland'.

The Council should review and update the information on planning enforcement that is available on the website including, inter alia, details of the Council's procedures for investigating enforcement complaints to illustrate what a person, either as a complainant or as a developer, can expect; what is not dealt with by the planning enforcement team and should be directed to other codes; and, details in relation to publicly accessible resources that are available. The publication of the Council's quarry register should also be considered in this regard.

Quarries

Section 261A of Act required authorities to complete a survey of every quarry to identify what quarries should have been subject to EIA or screening for EIA or AA and whether this had been carried out. The Council examined 116 quarries as part of this process and reports and relevant actions were completed. Notices were served under section 261A(4)(A) in six instances. The Council has advised that due to various factors, including resourcing, it has not been possible to extensively review and revisit section 261A case files. Notwithstanding, the Council continues to investigate new complaints in respect of quarrying activity and advised that there are five on-going enforcement cases relating to quarries.

The Council's process for identifying unauthorised quarry development is in accordance with relevant legislation. Recognising this, when resources are available the Council has demonstrated a broad understanding of the legislative and regulatory framework around the control of quarries under the Act, and the requirement to ensure quarries as previously registered are routinely monitored.

Short-Term Lettings

As there are no Rent Pressures Zones located in Co. Roscommon, the Council has advised that a formal procedure has not been established in response to Circular Letter PL 4/ 2019. Notwithstanding, any complaints that are received are processed in accordance with existing enforcement procedures.

Performance Rating and Recommendations

While acknowledging the existing resource constraints, the Council's delivery of its planning enforcement function is considered to be **satisfactory**. However, as the number of complaints continues to increase, process improvements should be implemented to ensure that the Council's enforcement responsibilities are delivered effectively and efficiently.

Given the complexity of planning enforcement legislation and practice, the Council should develop a procedural manual(s) for technical and administrative staff working in planning enforcement. These should include templates of forms, reports, letters and notices. Templates should be reviewed and updated with the team, for example, following changes in legislation.

In order to ensure appropriate management, tracking and recording of all documents related to their enforcement function, the Council should ensure a fit for purpose case management system is in place.

Such a system, as well as ensuring good file management, can also yield a number of other benefits, such as supporting management in monitoring and analysing trends. In addition, and having regard to the Development Management Guidelines, such a system should ensure that all documentation relating to enforcement actions (correspondence, planner’s report to the Manager, Manager’s decisions, representations made under section 152 of the Act, warning letters, enforcement notices, notes on site visits, etc.) is readily available to all parties directly involved and to the general public, except in certain circumstances pertaining generally to court action and revealing the identity of complainants.

Recommendation 12 – Preparation of Enforcement Manual

The Council should prepare and implement an enforcement procedures manual to provide guidance to all staff working in the Council’s enforcement section, on the various elements of the enforcement process with a specific focus on the three principal components of the enforcement function – process for undertaking ‘initial assessment’ of alleged unauthorised development, system for serving warning letters and enforcement notices and procedure for instigating court action. In tandem with this, the Council should prepare a standardised unauthorised development report template, which incorporates the key elements as set out in the OPR Practice Note on Enforcement.

Recommendation 13 – Enforcement Case Management System

The Council should develop a new enforcement case management system to facilitate the management, tracking and recording of all documents related to the management of unauthorised development complaints. Aligned with this, the Council should also consider putting a publicly available GIS-based monitoring system for enforcement in place, with all relevant information attached to an enforcement file available to the public on the Council’s website.

No.	Recommendation	Grading	Responsibility
12	Preparation of Enforcement Manual	Medium	Senior Planner
13	Enforcement Case Management System	Medium	Senior Planner

9

Other Planning Related Functions



9.1 - Part 8 / Local Authority Own Development

Local authority own-development, often referred to as 'Part 8' development, is provided for under section 179 of the Act, while Part 8 of the Planning & Development Regulations 2001, as amended ('the Regulations'), sets out procedures for the processing and approval of such proposals.

Roscommon County Council's approach to delivering Part 8 proposals sees each promoting section take full responsibility for the preparation, delivery and management of each proposal. The planning department does not assume an oversight role in relation to these proposals. The individual departmental procedures manuals, i.e. housing, roads and regeneration, were furnished as part of the review process. The planning department does not play a role in developing or maintaining these manuals. The housing department's manual offers the most comprehensive overview of the expected process, including details in respect of the public notice requirements, supporting environmental screening obligations as well as procedures in relation to managing third party submissions.

The planning department advised that its role is that of an internal consultee in the Part 8 process. In this regard, the senior executive planner in the forward planning department prepares a consultee report in relation to Part 8 proposals. The preparation of the chief executive's report for the elected members is the responsibility of the promoting section and the report received from the planning department is referenced therein. The development management section has no role in the evaluation of Part 8 proposals.

The Regulations require that public consultation is a key element of the Part 8 process, including making key stakeholders aware of proposals. However, the Council's various procedural documents do not reference how third party submissions are made available for public viewing, as required under article 83(2) of the Regulations. Furthermore, it is not detailed if or how participating members of the public, i.e. those who made submissions, are informed of the decision of the elected members as is required under article 84(1) of the Regulations.

Article 120 of the Regulations requires that the Council to undertake an EIA screening of sub-threshold development as part of the Part 8 process. Article 250 requires the undertaking of an AA screening for any local authority own-development. From an analysis of proposals available on the Council's website, it appears that screenings are undertaken in accordance with the legislation.

The procedure for progressing Part 8 projects is a requirement set out under the statutory planning provisions, accordingly a responsibility rests with the planning department to maintain appropriate oversight of proposals and ensure that all stages of the planning process are implemented in accordance with the planning code. Regardless of which Council department may be progressing an initiative, the planning department has an oversight role in relation to all project proposals.

Accordingly, in order to ensure consistency of approach and to avoid any gap in the procedural and legislative requirements pertaining to the preparation and management of Part 8 proposals, the Council should develop a single procedures manual clarifying the planning department's oversight role in relation to all Part 8 proposals. Council procedures should place an onus on promoting departments to confirm to the planning department that all required steps have been completed as necessary.

Specifically, the procedures document should identify the statutory requirements for Part 8 proposals in respect of public notices (templates); the referral of documents to relevant prescribed bodies; the making available of all documentation submitted with a Part 8 on the Council's website, as well as in public

buildings, and the timeframe for same; procedures in relation to the receipt of third party submissions; the preparation of the chief executive's report to the elected members (in accordance with section 179 of the Act); and the public availability of the chief executive's report and copy of the minutes of the Council meeting which approved the Part 8.

The manual should also include a procedure for the post completion checking of delivered Part 8 projects, for consistency with the project as approved, as well as ensuring that any member of the public who made a submission is informed in writing of the resolution passed by the elected members. The statutory timelines that must be adhered to should be clearly outlined and defined. Furthermore, the requirements under articles 120 and 250 of the Regulations, in relation to environmental screening, should be included as a key procedural step.

This procedures manual should be presented to senior management for consideration and approval and thereafter implemented for use by the Council in respect of all Part 8 applications.

Performance Rating and Recommendations

The Council's overall delivery of its Part 8 function is considered **satisfactory**. However, with the planning department playing a peripheral role in relation to the oversight of the process, there is a risk with regard to ongoing adherence to the statutory planning requirements when projects are being entirely delivered by a variety of promoting departments within the Council.

A more centrally coordinated approach would not only increase efficiency in the oversight of projects but would also reduce the chances of inconsistency or the risk of the correct steps not being adhered to in project delivery, which could open the Council's progression of proposals to challenge.

Recommendation 14 – Part 8: Oversight and Coordination

The Council's senior management should implement a single consolidated procedures manual for the delivery of Part 8 projects. The manual should provide instruction for all Council departments in relation to Part 8 project delivery, from pre-planning through to post-project review, including planning and environmental considerations, public consultation requirements, engagement with elected members and adherence to statutory timelines. In recognition that Part 8 procedures are set out under the planning code, the Council's procedures should confirm the planning department's oversight role and place an onus on promoting departments to report to the planning department in relation to the completion of required steps.

No.	Recommendation	Grading	Responsibility
14	Part 8 Oversight and Coordination	High	Director of Services

9.2 - Taking-In-Charge

The Council's taking-in-charge function sits within the planning department's technical hub team. The senior executive planner over the technical hub manages taking-in-charge as part of the team's wider responsibilities. The technical hub maintains a comprehensive database of all housing developments including those that have not yet been taken-in-charge. Developments that have not yet been taken-in-charge are categorised as either (i) developments that are satisfactorily completed but have not been taken-in-charge or (ii) developments that are incomplete and require work or have work ongoing. However, it would appear that developments that are completed but are not going to be taken in charge are not recorded.

A taking-in-charge policy document, which is available on the Council's website, sets out the required actions, timeframes and responsibilities at each stage of the process including details of:

- the documentation to be submitted with applications;
- the standards required for a development to be considered for taking-in-charge;
- the timeframes for each stage of the process;
- the services, areas and infrastructure that will be taken-in-charge; and,
- the maintenance services that will be provided following completion of the process.

The Council's policy document sets out the details of section 180 of the Act as well as information for developers, or residents, regarding how to apply to have a development taken-in-charge. There are approximately 400 housing estates in Co. Roscommon, of these, over 250 have been taken in charge by the Council, which is a strong performance by national standards.



Monksland, Co. Roscommon

Under the national Taking-in-Charge Initiative, a survey was carried out in 2015 to collate data regarding the taking-in-charge of estates across the country. That survey recorded 185 housing estates that were waiting to undergo the taking-in-charge process in Co. Roscommon in 2015. Since then, 82 developments have been taken-in-charge by the Council:

Year	2015	2016	2017	2018	2019	2020	2021	2022	2023	Total
Estates taken in charge	0	3	3	4	18	20	7	15	12	82

Table 12 | Developments taken-in-charge by the Council

Approximately 50 estates were going through the taking-in-charge process at the time the review was being conducted. A full list of all estates that have been taken-in-charge is available on the Council's website.

There are approximately 95 estates in the county that are classified as unfinished, and these are a key focus for the technical hub. In relation to older estates, where the developer is no longer present or functional or has not made an application for taking-in-charge and the period for enforcement action has expired, the residents can apply to have the estate taken-in-charge.

It is clear that the Council has been active in the carrying out of this function with a particular focus on resolving unfinished housing developments across the county. An unfinished housing development unit was established in 2021, sitting within the technical hub team, in response to the significant number of unfinished housing developments in the county. This unit maintains the database of housing developments, categorising those that have been taken-in-charge, along with those in progress and unfinished housing estates.

Performance Rating and Recommendations

Having regard to the available documentation, it would appear that the Council's systems and procedures in place for the delivery of this function are generally **satisfactory**.

While no formal recommendation is included in relation to this function, the Council should continue work on reducing the number of estates awaiting taking-in-charge in the county and should formalise a phased and detailed delivery schedule for the progression of this work.

The Council should also consider making a GIS map available through its website to allow the public to easily ascertain the status of housing estates across the county.

Appendix 1:

List of Recommendations



No.	Recommendation	Description	Grading	Responsibility
Organisation of Planning Department				
1	Capacity Building	<p>The Council must ensure that capacity is increased in the planning department to support staff in the delivery of its various functions. A multifaceted approach should be taken. Firstly, an urgent internal assessment report should be prepared identifying existing and future workloads and cross-referencing these to, both minimum and optimal, resource requirements. This assessment should be presented to the Council's senior management with a view to the allocation of appropriate additional resources to the planning department.</p> <p>At a minimum, a senior administrative position, reporting to the Director of Services, should be created within the planning department. A strengthened commitment to business planning, internal communications, workload management and staff development should be introduced immediately, with the newly established senior administrator assuming responsibility for driving a programme of business process improvement upon assignment. This will include scheduling team and departmental meetings on a regular basis, the implementation of a strategic departmental training plan and the development of efficient work practices across all areas of operation.</p>	Critical	Director of Services
2	Conflicts of Interest	The planning department should develop a procedure for staff to proactively identify and manage potential conflicts of interest. This procedure should include sufficient guidance to allow all individuals consider, and be aware of, any matters that could influence their impartiality, or the perception of their independence, in respect of the duties they perform.	Medium	Senior Planner

Forward Planning				
3	Forward Planning Work Programme	In tandem and cross-referenced to the assessment report outlined in Recommendation 1, a forward planning work programme should be prepared, detailing both the expected and essential outputs for the next three years. Details should include the resources required to deliver such outputs. This programme should include tasks such as annual reporting on development plan objectives, the phased delivery of other projects including local area plans, the preparation of a new development contribution scheme, the management and application of the RZLT and capacity for the preparation of Part 8 consultee reports. This work programme should be submitted to senior management of the Council for consideration.	High	Director of Services
4	Procedures Manual for Plan-making	A procedures manual for plan making should be developed for the use of staff across the planning department. The manual should document procedures integral to the plan-making process, e.g. data collection requirements, analysis, drafting, consultation phases, reporting, environmental assessment, publication and adoption of statutory plans, as well as the variation / amendment process, including timelines and responsibilities in relation to each core element. The manual should also provide for an ongoing and comprehensive monitoring and implementation regime in relation to the policy objectives set out in statutory plans. The focus should not only be on the application of the requirements of the legislation and statutory guidance, but also on good professional and operational practice.	Medium	Senior Planner
5	Development Plan Monitoring and Implementation	The Council should commit appropriate resources to ensuring that strategic data collection and analysis takes place in relation to the implementation of development plan objectives. The utilisation of strategic data should be a permanent function of the planning department - before, during and after the plan-making process – and should extend to the capture of data on residential and economic development activity, not only to address plan monitoring requirements, but also to contribute to the development and implementation of other strategic projects and policy initiatives. Ensuring that monitoring and analysis is conducted with adequate expertise will necessitate the ongoing availability of a GIS resource to the planning department, which could be realised through new or shared resources, while attention should also be given to the upskilling of staff within the department (as part of any learning and development strategy).	Low	Senior Planner

Architectural Heritage				
6	Architectural Conservation Management	Responsibility for the oversight and delivery of the Council's architectural conservation duties should be assigned to a dedicated role, at an appropriate level. Coordinating with the resources of the planning department, this individual should provide leadership in ensuring that architectural conservation duties are delivered proactively. This architectural conservation manager should oversee the development, implementation and monitoring of procedures in relation to the proactive delivery of architectural conservation duties by the wider planning department.	High	Director of Services
Land Activation and Projects				
7	Coordination of Activation Measures	Working with the environment and housing departments, the planning department should proactively seek to coordinate action to address derelict sites with other land activation measures. Appropriate structures, whether a working group or other reporting arrangements, should be created within the Council for the planning department to have a proactive role in the coordination of the various regeneration, land management and activation tools available. Enhanced coordination arrangements should include planning leadership at a senior level to ensure strategic planning input from project design through to monitoring and evaluation.	High	Director of Services
Development Management				
8	File Allocation and Processing	A new procedure should be introduced whereby all planning files are allocated at senior executive planner or senior administrative level. During allocation, it should be determined which cases are of strategic significance to require senior planner attention before being finalised. An objective should be set that all planning reports be finalised for management approval at least one week before the due date.	High	Director of Services
9	Public Engagement	The Council must ensure that a full pre-planning consultation service is available to members of the public, as expected under section 247 of the Act. A time allocation should be set for planners to dedicate to public engagement activities on a weekly basis, including consultations, meetings, phone queries, face-to-face assistance, etc. An agent's liaison group should be established and a schedule of workshops conducted.	Critical	Director of Services
10	Section 5 Declarations	The Council should update its procedures manual in relation to Section 5 declarations, to include, but not limited to, tracking of requests, a timeline for the uploading of Section 5 documentation with a clear referencing system and the use of a template for the planning assessment which includes AA and EIA screening (as referenced in Recommendation 11).	Medium	Senior Planner

11	Templates	The Council should update its planning report templates for planning applications and Sections 5 declaration requests to ensure compliance with statutory EIA and AA requirements.	High	Senior Planner
Enforcement				
12	Preparation of Enforcement Manual	The Council should prepare and implement an enforcement procedures manual to provide guidance to all staff working in the Council's enforcement section, on the various elements of the enforcement process with a specific focus on the three principal components of the enforcement function – process for undertaking 'initial assessment' of alleged unauthorised development, system for serving warning letters and enforcement notices and procedure for instigating court action. In tandem with this, the Council should prepare a standardised unauthorised development report template, which incorporates the key elements as set out in the OPR Practice Note on Enforcement.	Medium	Senior Planner
13	Enforcement Case Management System	The Council should develop a new enforcement case management system to facilitate the management, tracking and recording of all documents related to the management of unauthorised development complaints. Aligned with this, the Council should also consider putting a publicly available GIS-based monitoring system for enforcement in place, with all relevant information attached to an enforcement file available to the public on the Council's website.	Medium	Senior Planner
Other Planning Related Functions				
14	Part 8 Oversight and Coordination	The Council's senior management should implement a single consolidated procedures manual for the delivery of Part 8 projects. The manual should provide instruction for all Council departments in relation to Part 8 project delivery, from pre-planning through to post-project review, including planning and environmental considerations, public consultation requirements, engagement with elected members and adherence to statutory timelines. In recognition that Part 8 procedures are set out under the planning code, the Council's procedures should confirm the planning department's oversight role and place an onus on promoting departments to report to the planning department in relation to the completion of required steps.	High	Director of Services



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