



Sligo County Council
Comhairle Chontae Shligigh



Chief Executive's Report

on submissions and observations
received in relation to the
Draft Ministerial Direction
regarding the **Sligo CDP 2024-2030**

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1. Introduction

1.1 Background to the Draft Direction

The Sligo County Development Plan 2024-2030 was made by the Members of Sligo County Council on 30 September 2024, in accordance with the provisions of Section 12(10) of the Planning and Development Act 2000 (as amended).

The Plan was made with 303 out of the 308 Proposed Amendments. A total of 40 amendments were agreed by the Elected Members contrary to the recommendations of the Office of the Planning Regulator (OPR).

Following a statutory notification sent by Sligo County Council on 7 October 2024, the Planning Regulator wrote to the Minister of State for Local Government and Planning (Department of Housing, Local Government and Heritage) on 27 October 2024. The Regulator informed the Minister that “the County Development Plan has not been made in a manner consistent with recommendations of the Office” and recommended the exercise of the Minister’s functions “under the relevant provisions of section 31 of the Act taking such steps as to rectify the matter”.

On 8 November 2024, Alan Dillon, the Minister of State for Local Government and Planning, gave notice of his intention to issue a direction to Sligo County Council to take certain measures regarding the Sligo County Development Plan 2024-2030, consequent to a recommendation made by the Office of the Planning Regulator on 27 October 2024.

1.2 Contents of the Draft Direction

The Minister’s notice was accompanied by a draft of the Direction and a request to publish notice of the Draft Direction no later than two weeks after receipt of the Minister’s notice.

In his letter to Sligo County Council’s Chief Executive, the Minister indicates that he has formed the opinion that:

- (i) Sligo County Council, in making the Development Plan, has failed to implement recommendations made to it, as a Planning Authority, by the Office of the Planning Regulator, under Section 31AM of the Act;
- (ii) the Plan, as made, fails to set out an overall strategy for the proper planning and sustainable development of the area;
- (iii) the Plan is inconsistent with national and regional policy objectives specified in the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy for the Northern and Western Region (RSES);
- (iv) the Plan, as made, is not in compliance with the requirements of the Act.

The Draft Direction requests Sligo County Council to delete a zoning objective, reverse 21 amendments to zoning and omit one amendment from the text of the adopted County Development Plan. This request is accompanied by a Statement of Reasons. Full details of the Draft Direction are given in Section 2 of this Report.

1.3 Public consultation on the Draft Direction

On 21 November 2024, two weeks after the receipt of the Minister's Draft Direction, Sligo County Council published a newspaper notice announcing public consultation on the Draft Direction, as required under Section 31(7) of the Act. The notice included the Statement of Reasons which accompanies the Draft Direction.

The public was invited to make submission or observations on the Draft Direction for a period of two weeks, from 25 November to 9 December 2024. A total of 113 submissions were received during the consultation period, including one from the Northern and Western Regional Assembly.

No submission was received by the Planning Authority from the elected members of Sligo County Council. However, the Members have made a submission directly to the Office of the Planning Regulator, in accordance with Section 31(10) of the Planning and Development Act 2000 (as amended).

1.4 Format of the Chief Executive's Report

Section 31(8) of the Planning and Development Act (as amended) requires the Chief Executive (CE) to prepare a report on submissions and observations received during the public consultation on the Draft Direction. The CE Report must:

- summarise the views of any person who made submissions or observations to the Planning Authority;
- summarise the views of and recommendations (if any) made by the elected members of the Planning Authority;
- summarise the views of and recommendations (if any) made by the Regional Assembly;
- make recommendations in relation to the best manner in which to give effect to the Draft Ministerial Direction.

This Report complies with the above requirements in a format which reflects the structure of the Draft Ministerial Direction.

The Report consists of a single volume and two appendices.

After the present **Introduction** (Section 1), the main body of the Report has 24 more sections:

- **Section 2** includes the full content of the Draft Direction, including the Statement of Reasons.
- **Section 3** is an Executive Summary of the Report, containing the overall Chief Executive's recommendation on the best manner to give effect to the Draft Direction.
- **Sections 4 to 25** focus on individual items of the Draft Direction, each of them containing:
 - a description of the amendment listed in each item of the Draft Direction;
 - the change requested by the Minister;
 - brief summaries of submissions relating to the respective item/amendment;
 - the Chief Executive's recommendation on the best way to give effect to the Draft Direction in relation to the respective item/amendment.

Appendix 1 lists the persons and organisations that made submissions during the public consultation on the Draft Direction.

Appendix 2 contains the extended summaries of all submissions.

1.5 Summarising views and recommendations

In accordance with the legislation, this report summarises the views and recommendations contained in submissions in the following manner:

- each of the **Sections 4 to 25** contain **brief summaries** of the submissions received from citizens, community organisations and public bodies (if any) in relation to the Draft Direction item addressed in that section;
- the views and recommendations of the **Northern and Western Regional Assembly** are summarised in a distinct subsection of each section;
- **detailed summaries** of all submissions are included in **Appendix 2** of this Report.

1.6 What happens next?

The Chief Executive's Report on submissions relating to the Draft Direction must be submitted to OPR, the Minister and the Elected Members by 15 January 2025.

Section 31(AN)(4) of the Act requires the OPR to consider the CE Report, together with the submission made by the elected members of Sligo County Council under Section 31(10), mentioned in Subsection 1.3 above. Within three weeks of receiving the CE Report, i.e. by 5 February 2025, the OPR must recommend to the Minister that he or she issue the Direction with or without minor amendments.

Appointing an OPR inspector

The OPR will appoint a person to be an inspector if the Office is of the opinion that:

- a material amendment to the Draft Direction may be required
- OR
- further investigation is necessary in order to clarify any aspect of the CE Report or of any submission made
- OR
- it is necessary for any other reason.

Following receipt of the Inspector's Report (if required), the OPR must recommend to the Minister to issue or not issue the Direction.

Final Direction

If the Minister agrees with the OPR's recommendation, a Direction will be issued with or without minor amendments within six weeks of receiving the OPR's recommendation, i.e. by 19 March 2025.

Pursuant to Section 31(17) of the Act, the Minister's Direction has immediate effect, and its terms must be incorporated into the Plan, overwriting the relevant elements of the adopted Plan.

The final Direction, as issued, must be made available for inspection by members of the public at the offices of Sligo County Council and on the Council's website.

Final version of the Development Plan

Following the completion of the Ministerial Direction process, the current *Interim consolidated version* of Sligo CDP 2024-2030 will be updated, and the final Development Plan will be published on the Council's website.

2. Draft Direction in full

2.1 Contents of the Draft Direction

The Minister of State at the Department of Housing, Local Government and Heritage in exercise of the powers conferred on him by section 31 of the Planning and Development Act 2000 (No.30 of 2000) ("the Act") and the Housing, Local Government and Heritage (Delegation of Ministerial Functions) Order 2024 (S.I. No. 234 of 2024), and consequent to a recommendation made to him by the Office of the Planning Regulator, hereby directs as follows:

- (1) This Direction may be cited as the Planning and Development (Sligo County Development Plan 2024 – 2030) Direction 2024.
- (2) The Planning Authority is hereby directed to take the following steps with regard to the County Development Plan:
 - a. Delete the following zoning objectives from the adopted County Development Plan:
 - (i) the lands on the L3203 on the western approach to Grange, i.e. the subject land reverts to not zoned from Strategic Land Reserve;
 - b. Delete the following material alterations from the adopted County Development Plan such that the subject lands revert to as indicated in the draft County Development Plan:
 - (i) PAZ 9, i.e. the subject land reverts to Strategic Land Reserve (SLR) from New Residential (nRES);
 - (ii) PAZ 11, i.e. the subject land reverts to Green Belt from New Residential (nRES) and Open Space (OS) and the Development Limit reverts to the draft Plan;
 - (iii) PAZ 12, i.e. the subject land reverts to Green Belt (GB) from New Residential (nRES);
 - (iv) PAZ 13, i.e. the subject land reverts to Strategic Land Reserve (SLR) from New Residential (nRES);
 - (v) PAZ 14, i.e. the subject land reverts to Green Belt (GB) from New Residential (nRES);
 - (vi) PAZ 15, i.e. the subject land reverts to Green Belt (GB) from New Residential (nRES) and Strategic Land Reserve (SLR);
 - (vii) PAZ 31, i.e. the subject lands revert to Open Space (OS) from New Residential (nRES)
 - (viii) PAZ 32, i.e. the subject lands revert to Green Belt (GB) from New Residential (nRES)
 - (ix) PAZ 33, i.e. the subject lands revert to Green Belt from New Residential (nRES)
 - (x) PAZ 42, i.e. the subject lands revert to Green Belt (GB) from New Residential (nRES)
 - (xi) PAZ 45, i.e. the subject lands revert to Green Belt (GB) from New Residential (nRES)
 - (xii) PAZ 57, i.e. the subject lands revert to Strategic Land Reserve (SLR) from New Residential (nRES)
 - (xiii) PAZ 62, i.e. the subject lands revert to Green Belt from Tourism (TOU)
 - (xiv) PAZ 63, i.e. the subject lands revert to Green Belt (GB) from Rural Village (RV)
 - (xv) PAZ 76, i.e. the subject lands revert to Green Belt (GB) from Rural Village (RV)

- (xvi) PAZ 79, i.e. the subject lands revert to Green Belt (GB) from Rural Village (RV), and the Development Limit reverts to the draft Plan
- (xvii) PAZ 80, i.e. the subject lands revert to Green Belt (GB) from Rural Village (RV), and the Development Limit reverts to the draft Plan
- (xviii) PAZ 34, i.e. the subject lands revert to Green Belt (GB) from Tourism (TOU) and Open Space (OS)
- (xix) PAZ 41, i.e. the subject lands revert to Green Belt (GB) from Business/Industry/Enterprise (BIE)
- (xx) PAZ 44, i.e. the subject lands revert to Green Belt (GB) from Business/Industry/Enterprise (BIE)

c. Delete the following text at section 33.9.1:

Where direct vehicular access onto national primary roads cannot be avoided (such as situations arising from national road realignment schemes), a Departure from TII Publications Standards DN-GEO-03060 with justification shall be required, as provided for in Section 5.5. Direct Accesses of DN-GEO-03060. In all cases, the number of accesses on to the national road should be minimised, either by consolidating them into a single access point, or connecting them to existing side roads. The sight distances required for access onto national primary and secondary roads are set out in Table 33.8. The sight distances are measured from the access point to the near-side edge of the carriageway in accordance with the TII Publications Standards DN-GEO-03031 and DN-GEO-03060.

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

2.2 Statement of Reasons for the Draft Direction

- I. The County Development Plan as made includes material alterations to the draft County Development Plan for zoning objectives in peripheral and/or non-sequential, and/or unserved locations, and/or outside the relevant CSO settlement boundaries, and/or do not conserve and enhance the natural and cultural heritage of County Sligo, providing additional residential land in excess of what is required under the growth targets of the core strategy for Sligo Town, Grange, Enniscrone, Ballysadare, Strandhill, Curry and Gorteen.

The zoning objectives and material alterations would individually and cumulatively encourage a pattern of development in particular locations which is inconsistent with the core strategy of the County Development Plan, NPO 3c, NPO 18a, NPO 60, NPO 72a-c of the National Planning Framework (NPF), RPO 3.2(b), RPO 3.7.39, RPO 5.14 of the RSES, and section 10(2)(n) of the Act concerning the promotion of sustainable settlement and transport strategies and the obligations under the Climate Action and the Low Carbon Development Act 2015, as amended (the Climate Act), and fails to have regard to the policy and objective for settlement capacity audits and the policy and objective for sequential zoning under the Development Plans, Guidelines for Planning Authorities (2022) (the Development Plans Guidelines).

- II. The County Development Plan as made also includes material alterations to the draft Plan, which zone additional land for Tourism in the area of Enniscrone and Easky, and for Business/Industry/Enterprise in the area of Ballysadare which can accommodate a range of high

intensity employment uses. These zoning objectives are located in peripheral and unserved locations, outside the relevant CSO settlement boundaries and would encourage a pattern of development that is inconsistent with NPO 18a and NPO 74 to align the NPF and the NDP through the delivery of National Strategic Outcomes including NSO 1 compact growth and NSO 2 Enhanced Regional Accessibility, NPO 72a- c tiered approach to zoning, RPO 6.5 of the RSES to protect the strategic transport function of national roads, and section 10(2)(n) of the Act concerning the promotion of sustainable settlement and transport strategies and the obligations under the Climate Act, and fails to have regard to the policy and objective for sequential zoning under the Development Plans Guidelines and section 2.5 of National Roads Guidelines for Planning Authorities (2012) (National Roads Guidelines).

- III. The County Development Plan as made includes material alterations to zone land for vulnerable and highly vulnerable uses in Sligo Town, Easky, Ballinafad, Curry and Gorteen which lands are partially located within flood zone A and/or B, inconsistent with NPO 57 to avoid inappropriate development in all areas at risk of flooding in accordance with the Flood Risk Management Guidelines for Planning Authorities (2009), and RPO 3.10 to implement the recommendations of the Flood Guidelines.
- IV. The County Development Plan as made includes a material amendment to introduce text into section 33.9.1 of the Plan which provides for direct vehicular access onto national primary roads in certain circumstances inconsistent with NPO 74 to align the National Planning Framework and the National Development Plan through the delivery of National Strategic Outcomes including NSO 2 Enhanced Regional Accessibility, and RPO 6.5 to give effect to NSO 2 and to maintain the strategic capacity and safety of the national road network, and fails to have regard to sections 2.5 and 2.6 of the Spatial Planning and National Roads Guidelines to maintain the capacity, efficiency and safety of national roads, avoiding the creation of any additional access point from new development or the generation of increased traffic from existing accesses to national roads to which speed limits greater than 60 km/h apply.
- V. Further, the statement under Section 28(1A)(b) attached to the Development Plan as made fails to include information that demonstrates that the planning authority has formed the opinion that it is not possible to implement the policies and objectives contained in the Development Plans Guidelines for Planning Authorities (2022), and/or in the Spatial Planning and National Roads Guidelines and/or in The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) because of the nature and characteristics of the area or part of the area and to give reasons for the forming of that opinion and to explain why it is not possible to implement the policies and objectives of the Minister, contrary to Section 28(1B)(b);
- VI. The Development Plan has not been made in a manner consistent with, and has failed to implement, the recommendations of the Office of the Planning Regulator made under section 31AM of the Act.
- VII. The Minister is of the opinion that the Development Plan as made is not consistent with the objectives of the RSES, contrary to section 10(1A) and section 27(1) of the Act.
- VIII. The Minister is of the opinion that the Development Plan as made is not consistent with National Policy Objectives 3c, 18a, 57, 60, 72a – c and 74 of the National Planning Framework.
- IX. The Minister is of the opinion that the Development Plan as made fails to set out an overall strategy for the proper planning and sustainable development of the area.
- X. The Development Plan is not in compliance with the requirements of the Act.

3. Executive Summary

During the consultation period, Sligo County Council received 109 submissions from the public and four from prescribed bodies as follows:

- **the Health and Safety Authority** (Submission 1) reiterated a request which had already been addressed in the Plan, but did not refer to any of the items listed in the Draft Direction;
- **the Northern and Western Regional Assembly** (Submission 15) indicated its concerns regarding certain sites zoned for residential development in Sligo Town/Regional Growth Centre (PAZ-9 and PAZ 11-15) and its overall support for the Draft Direction;
- **Transport Infrastructure Ireland** (Submission 18) relates exclusively to item 2(c) of the Draft Direction (regarding PA-180);
- **Uisce Éireann** (Submission 73) provided additional information on water services availability to nine of the twenty-one sites subject to the Draft Direction.

The NWRA submission was accompanied by a cover letter containing a statement relating to the position of the elected members of the Regional Assembly (of which some are also members of Sligo County Council):

"Following careful review, the elected members resolved to accept the report and to make the submission as outlined, subject to advising that Sligo County Council and the Minister ensure that population and housing figures in the finalised plan are clearly and accurately transposed. This is considered essential to safeguard the robustness and integrity of the County Development Plan."

Considering the above advice and having regard to the Members' submission made directly to the OPR, the Chief Executive is proposing to correct certain figures in **Table 5.2** (Total adjusted housing demand) and in **Table 3.2** (Core Strategy Table) in the final Development Plan that will be published following the completion of the Direction process.

3.1 Main issues raised in submissions

The majority of these submissions fall into two categories:

- A.** submissions highlighting the shortage of housing in Sligo Town and Strandhill, therefore supporting the zoning of additional lands for residential development, in opposition to the Draft Direction;
- B.** Submissions highlighting the shortage of community and transport infrastructure to serve new housing developments in Strandhill, therefore opposing the zoning of additional lands for residential uses, thus supporting the Draft Direction.

Other notable issues arising from submissions are:

- the potential impact of residential development on the archaeological heritage of Cairns Hill and on the Council's application for designation of 'The Passage Tomb Landscape of County Sligo' as a UNESCO World Heritage Site;
- the confirmation – by Uisce Éireann and by consultants on behalf of landowners – of availability of service infrastructure to facilitate development on certain sites.

A particular set of issues was raised in six separate submissions (65, 67, 70, 72, 79, 82) prepared by Robert Keran (planning consultant) on behalf of landowners of sites in Sligo Town, Ballysadare and Strandhill, which are subject to the Draft Direction.

Submission 82 focuses on certain errors identified in the calculation of the total housing demand for the Development Plan period, on the – allegedly – incorrect assessment (or lack of assessment) of the service infrastructure of certain sites, and on the “flawed” application of the Development Plan Guidelines in carrying out settlement capacity audits.

In essence, the above-mentioned submissions have been made for the purpose of supporting the zoning of specific sites at Hazelwood (Sligo Town), Ballysadare and Strandhill, in opposition to the Draft Direction.

3.2 Errors in calculating the total adjusted housing demand (HST figure) and consequences for Tables 5.2 and 3.2

It is acknowledged that errors have occurred in the application of the DHLGH-supplied housing projections spreadsheet (January 2021) to the calculation of the adjusted total housing demand in Co. Sligo during the Plan period. These errors have resulted in a smaller number of houses allocated to lands zoned for residential uses in the County’s main settlements. However, it is essential to note that:

- the Draft Plan, and the adopted Plan, zoned MORE land than was necessary to meet the total housing demand;
- the total (County) housing allocation was divided exclusively between Settlement Consolidation Sites, substantial Infill Sites and Additional Provision sites in Sligo Town, the three Support Towns (Ballymote, Enniscrone, Tobercurry), the five Satellite Villages and the three Villages with Special Coastal Tourism Functions;
- the Draft Plan and the adopted Plan did not take into account the full housing potential of lands zoned Rural Village (RV) in the 19 villages where no housing allocations were made through the Core Strategy;
- the residential densities used in calculating the potential yields of zoned lands were the lowest of the density ranges specified in the *Sustainable Residential Development and Compact Settlement Guidelines* for each settlement category; (in practice, the Planning Authority strongly encourages developers to apply higher densities when designing residential developments);
- the Draft Plan and the adopted Plan did not allocate housing quotas to Sligo Town areas zoned for Town Centre uses, or to designated Regeneration Sites, which are nonetheless expected to deliver a mix of commercial and residential development.

Having regard to the above, it is considered that both the Draft Plan and the adopted Plan have ensured that sufficient zoned land will be available for residential development during the Development Plan Period.

It is intended that any errors appearing in Table 5.2 (Adjusted total housing demand in Co. Sligo during the Plan period) and in Table 3.2 (Core Strategy Table) will be corrected in the Sligo CDP 2024-2030, which will be finalised and published after the conclusion of the Ministerial Direction process.

3.3 Recommendation regarding Table 5.2 (Adjusted total housing demand)

Submission 82 highlighted a number of errors in the calculation of the adjusted total housing demand for County Sligo. Due to the detailed explanations provided in this submission, the source of these errors has now been identified and the figures have been corrected.

The adjusted total housing demand figure for the Plan period should have been 4,520 units, not 3,892 units. The **Corrected Table 5.2** (see following pages in this Section) shows the figures that should have been published in the Draft Plan in 2023.

Having regard to the Northern and Western Regional Assembly's advice "*that population and housing figures in the finalised plan are clearly and accurately transposed*" in order to "*safeguard the robustness and integrity of the County Development Plan*", it is considered that **the final Ministerial Direction should include a recommendation to replace Table 5.2, as currently appearing in the adopted Plan, with the Corrected Table 5.2 shown in this Report.**

3.4 Recommendation regarding Table 3.2 (Core Strategy)

The Core Strategy Table has been reconfigured in the *Interim consolidated version* of the Sligo CDP 2024 - 2030, which was published on 11 November 2024, following the adoption of the Plan by the Elected Members of Sligo County Council on 30 September 2024.

The Core Strategy Table should now be modified by applying the corrected HST allocation (total adjusted housing demand) which results from the Corrected Table 5.2 (see previous subsection), and by allocating the additional houses to Sligo Town.

Corrected Core Strategy Table reflecting all zoned residential land in the Adopted Plan

The Elected Members made the Development Plan with a substantial number of zoning amendments, thereby increasing the amount of zoned land with housing potential from 132.5 ha (in the Draft Plan) to 205 ha in the adopted Plan.

The corresponding **Corrected Core Strategy Table**, accounting for all adopted zoning amendments, is shown further in this Section. It must be noted that this table has been reconfigured to reflect the adopted Plan and is now partly different from the version of Table 3.2 contained in the Draft Plan.

Having regard to the Northern and Western Regional Assembly's advice "*that population and housing figures in the finalised plan are clearly and accurately transposed*" in order to "*safeguard the robustness and integrity of the County Development Plan*", it is considered that **the final Ministerial Direction should include a recommendation to replace the Core Strategy Table (Table 3.2), as currently appearing in the adopted Plan, with the Corrected Core Strategy Table as shown in this Report.**

3.5 Effects of the Ministerial Direction on housing land supply

Should the final Ministerial Direction be issued **without** modifications in relation to lands where housing allocations apply, i.e. excluding from the final Plan circa 55 hectares of land zoned residential, the potential housing yield of the remaining lands (calculated using the minimum acceptable densities) would still be higher than the total housing demand for the Plan period.

The summary table below shows the potential housing yield at each stage in the Plan review process, including a hypothetical situation where all nRES lands subject to the Draft Direction are rezoned for uses other than residential.

Stage in the Plan review process	Adjusted total housing demand in Co. Sligo (Housing Supply Target)	Amount of land zoned residential, where housing allocations apply	Potential housing yield
Draft Plan	3,892 units <i>(incorrect figure)</i>	132.5 ha	4,566 units
Adopted Plan	4,029 units <i>(incorrect figure)</i>	205 ha	6,605 units
Adopted Plan with corrected HST figure	4,520 units	205 ha	6,605 units
Potential Final Plan with corrected HST figure, excluding nRES lands subject to the Draft Direction	4,520 units	150 ha	5,005 units

Corrected Table 5.2 Adjusted total housing demand in Co. Sligo during the Plan period

(Draft Plan version with corrected values for rows A, B, D, E1, E2, E3, E4)

Plan period: Q3 2024 to Q2 2030 (1 July 2024 to 30 June 2030)		Annual average households	Total households
A	ESRI NPF scenario projected new household demand 2017 to Q2 2030 (end of Plan period)	897	5,382 (from ESRI research)
B	Actual new housing supply 2017 to Q4 2022 and estimated future delivery in 2023 and Q1-Q2 2024		1,186 (from CSO completions data and estimation of 2023-2024 delivery based on average of 2017 to 2022)
C	Homeless households (latest data from January 2023 Homeless Report), and unmet demand as at Census 2016		59 (from DHLGH and Census) (was 43 originally)
D	Plan Housing Demand = Total (A-B+C) (Projected ESRI NPF demand - new completions) + Unmet demand	709	4,255
E	Potential adjustment 1 to end 2026 portion of plan period to facilitate convergence to NPF strategy (where justified)	Mid-point between ESRI NPF and baseline scenarios to 2026 in lieu of A above	
E1	ESRI Baseline scenario projected new household demand 2017 to Q4 2026		4,474 (from ESRI research)
E2	ESRI NPF scenario projected new household demand 2027 to Q2 2030 (Plan end)		1,438 (from ESRI research)
E3	Mid-point between A-E2 (ESRI NPF and Baseline scenarios to Q4 2026)		4,209
E4	Adjusted Total Plan Demand calculation based on E2 + E3 in lieu of A above	753	4,520 (E2 + E3 - B + C = total)
F	NOT APPLICABLE IN THIS EXAMPLE <i>Potential adjustment 2 to end 2026 portion of plan period to facilitate convergence to NPF strategy, applicable where B exceeds or is close to D (where justified)</i>	Mid-point between ESRI NPF and baseline scenarios to 2026 in lieu of A above, plus up to 25%	

Corrected Core Strategy Table (Table 3.2 in Section 3.3)

*Adopted Plan version including all zoning amendments (PAZ),
with corrected County HST, and difference between Draft Plan HST and corrected HST
allocated entirely to Sligo Town (4,520 – 3,892 = 628 additional houses for Sligo Town)*

0	1	2	3	4	5	6	7
Settlement	Population 2022 and percentage of County population	Population target 2030 and percentage of County target	Housing allocation 2030 and percentage of County HST allocation	Minimum area required to deliver the housing allocation	RES and MIX zoning (only lands with housing potential)	Potential housing yield of RES and MIX zoned lands (dwellings)	Excess zoned land
Sligo Town Regional Growth Centre	20,608 (29.3%)	25,360 (33.12%)	3,140 (69.47%)	89.71 ha	130.91 ha	4,477 units	41.2 ha
Ballymote Support Town	1,711 (2.44%)	1,850 (2.41%)	185 units (4.09%)	7.4 ha	15.53 ha	354 units	8.13 ha
Enniscrone Support Town	1,291 (1.84%)	1,400 (1.82%)	130 units (2.87%)	5.2 ha	8.63 ha	159 units	3.43 ha
Tobercurry Support Town	2,307 (3.29%)	2,450 (3.20%)	130 units (2.87%)	5.2 ha	7.02 ha	178 units	1.82 ha
5 Satellite Villages	7,250 (10.32%)	7,750 (10.12%)	370 units (8.18%)	18.4 ha	32.96 ha	650 units	14.56 ha
3 villages with special tourism functions	1,290 (1.83%)	1,400 (1.82%)	70 units (1.55%)	3.45 ha	9.96 ha	207 units	6.51 ha
All other villages and rural areas	35,913 (51.16%)	36,500 (47.67%)	495 units (10.95%)	n/a	No RES or MIX zoning	580 units	n/a
Total	70,198	76,560 (estimated from NPF plus additional Sligo Town population from RSES)	4,520 units (HST allocation)	129.36 ha	205 ha	6,605 units (146 % of HST allocation)	75.65 ha

3.6 Overall Chief Executive's recommendation

The vast majority of issues raised by the public have already been the subject of submissions received by Sligo County Council during public consultation on the Draft Sligo CDP 2024-2030 and on the Proposed Amendments to the Draft Plan.

These issues have been addressed by the Chief Executive in the Second and Third CE Reports, respectively. The opinions expressed by the Chief Executive in previous reports remain largely unchanged.

The CE recommendations regarding the best manner to give effect to the Draft Direction are similar to those made in previous CE Reports, with three exceptions:

Item 2(a)(i) of the Draft Direction

- It is considered appropriate for the lands subject to PAZ-49 to revert to Green Belt zoning (as originally designated in the Draft Plan), instead of becoming an “island” of unzoned land within a wider area zoned Green Belt.

Item 2(b)(xiv) of the Draft Direction

- In the case of the site subject to PAZ-63, additional information provided by Uisce Éireann helped establish that the site is serviceable during the life of the Plan, and a portion of the site can be developed without encroaching onto lands identified as Flood Zone A or B.

Item 2(c) of the Draft Direction

- With respect to PA-180, it is essential that the text of Section 33.9.1 reverts to the version contained in the Draft Plan (whereas the Draft Direction requests the removal of the amendment together with additional text which was not subject to any proposed amendment).

Recommendation

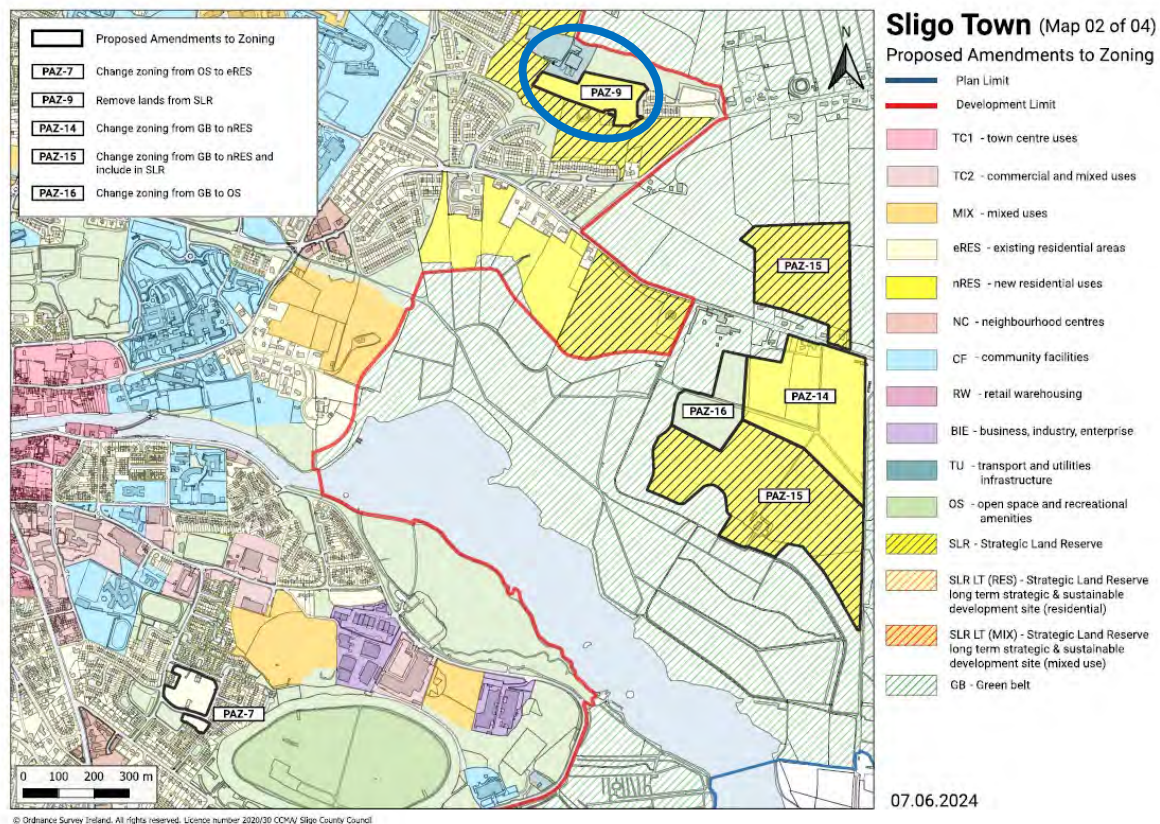
It is considered that the final Ministerial Direction should be issued with the following minor amendments:

- | | |
|-----------------------|---|
| Item 2(a)(i) | the lands subject to PAZ-49 revert to Green Belt (GB) zoning |
| Item 2(b)(xiv) | the portion of lands subject to PAZ-63 which overlaps with Flood Zones A or B reverts to Green Belt (GB) zoning |
| Item 2(c) | the text of Section 33.9.1 reverts to the Draft Plan version, except for the updated title of the relevant TII publication. |

In addition, the final Ministerial Direction should include:

- a recommendation to **replace Table 5.2**, as currently appearing in the adopted Plan, with the **Corrected Table 5.2** shown in this Report;
- a recommendation to **replace the Core Strategy Table (Table 3.2)**, as currently appearing in the adopted Plan, with the **Corrected Core Strategy Table** as shown in this Report, ensuring that the figures contained in this Table reflect the Minister's Direction.

4. Draft Direction on PAZ-9



4.1 Background information

PAZ-9 (Sligo Town)	
Site area and location	2.48 ha at Farranacardy Td.
Draft Plan zoning	Strategic Land Reserve (SLR)
Proposed amendment	Remove 2.48 ha of nRES from the Strategic Land Reserve (SLR)
OPR recommendation on material alteration	MA Recommendation 1 requests the Planning Authority to make the Plan without this amendment.
Chief Executive's response in the Third CE Report	<p>The submissions received from the OPR and other prescribed bodies oppose the zoning of the subject lands.</p> <p>Such zoning lacks consistency with the Core Strategy of the Draft Plan and has not been considered within the context of the Local Transport Plan. The lands are in a peripheral location, outside the CSO settlement boundary.</p>

PAZ-9 (Sligo Town)	
	<p>The Settlement Capacity Audit (SCA) confirmed that there are many sites ranked higher than the subject lands that, when aggregated, have sufficient capacity to deliver the Core Strategy housing allocation for Sligo Town.</p> <p>Having regard to the above and as advised in the Second Chief Executive's Report, the CE does not support PAZ-9.</p>
Adopted zoning	New residential uses (nRES)

4.2 Draft Direction Item 2(b)(i)

- b. Delete the following material alterations from the adopted County Development Plan such that the subject lands revert to as indicated in the draft County Development Plan:
- (i) PAZ 9, i.e. the subject land reverts to Strategic Land Reserve (SLR) from New Residential (nRES)

4.3 Submissions relating to Item 2(b)(i)

Only two submissions have been received in relation to this item: one from the NWRA (supporting the Draft Direction) and the other from a consultant representing the landowner (opposing the Draft Direction).

4.3.1 Submission supporting the Draft Direction

Submission 15 – Northern and Western Regional Assembly (extract)

<https://consult.sligococo.ie/en/submission/slg-c57-15>

The Assembly, in its submission on the proposed Material Alterations (dated 05 July 2024), did not support Material Amendments now contained in 2. b (i) – (vi) of the draft Ministerial Direction (i.e. **PAZ-9**, PAZ-11, PAZ-12, PAZ-13, PAZ-14 and PAZ-15).

The Assembly's position on these matters has not changed. The Assembly supports the draft Ministerial Direction.

Relevant extracts from the Assembly's previous submission (July 2024) are as follows:

- The proposed amendments in **PAZ 9** and PAZ 11-15 represent significant amendments to the Sligo Town Plan that would constitute an increase of approximately 66.87 ha of nRES (New Residential) zoned land, primarily at the periphery of the plan area or outside the plan area.
- These proposed additional lands would generate between 2,500 and 3,000 additional residential units at the density of 35-50 dwelling units per hectare as required for Regional Growth Centres in the

Sustainable and Compact Settlements, Guidelines for Planning Authorities. This would provide for a population increase of approximately 6,000–7,000 people.

- *This additional zoning does not appear to be realistic nor reasoned, based on the current demographic growth trajectory of Sligo Town.*
- *The additional zonings are not supported by an evidence-based approach, and are peripheral in nature, with 36 ha of proposed zoning nRES outside the current Sligo Town Boundary and negating the objective to deliver compact settlements of scale as set out in the RSES. The proposed Amendments fail to apply the sequential approach to development to support the sustainable compact growth of the town and its environs.*

4.3.2 Submission opposing the Draft Direction

Submission 109 – Blackmud Developments Ltd.

<https://consult.sligococo.ie/en/submission/slg-c57-109>

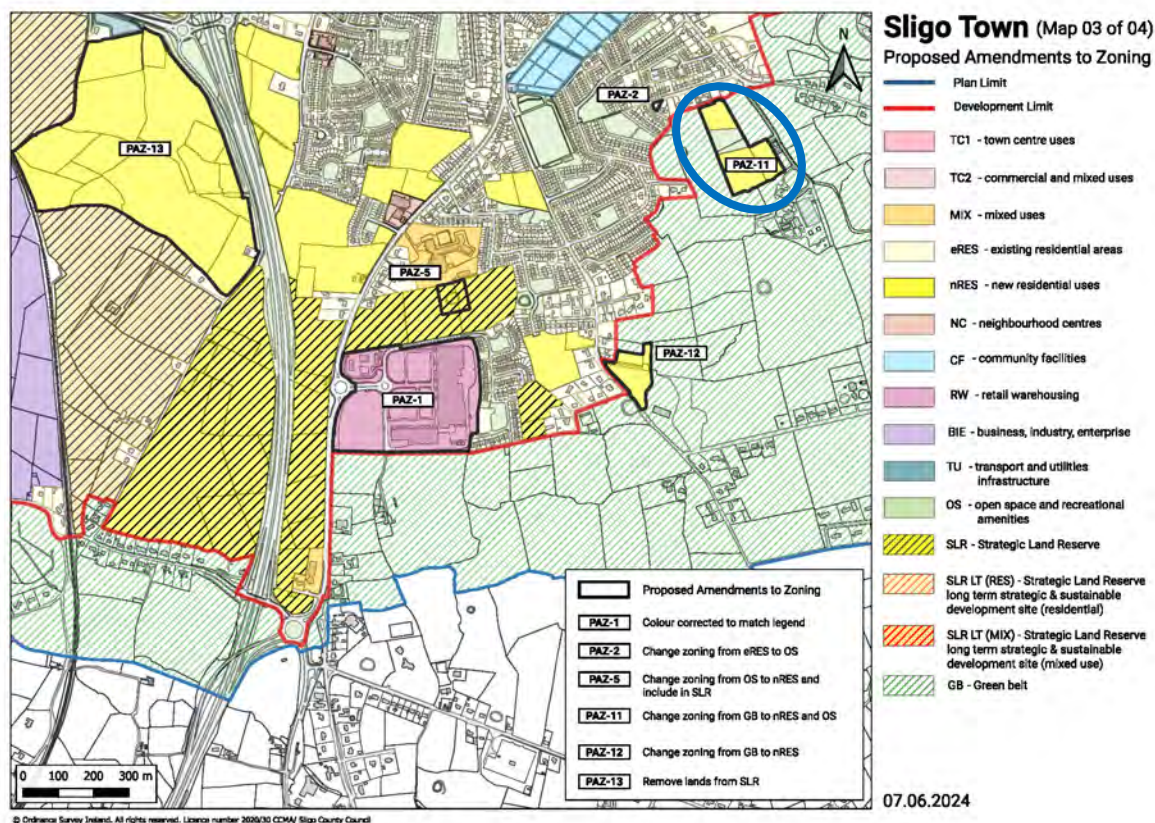
The submission supports the zoning of the lands subject to PAZ-9 for “domestic housing construction”. It indicates that the existing 18-houses estate is connected to “all essential services which includes a mains sewer, mains surface water, mains water, broadband and ESB”.

Extracts of this landowner’s previous submissions are included in the more detailed summary of this submission – refer to Appendix 2 of this Report.

4.4 Chief Executive’s recommendation on Item 2(b)(i)

Consistent with the Chief Executive’s recommendation contained in the Third Chief Executive’s Report in respect of PAZ-9, the subject lands should revert to Strategic Land Reserve.

5. Draft Direction on PAZ-11



5.1 Background information

PAZ-11 (Sligo Town)	
Site area and location	3.06 ha at Tonaphubble Td.
Draft Plan zoning	Green Belt (GB)
Proposed amendment	Change the zoning of 3.06 ha of Green Belt to 2.46 ha nRES and 0.6 ha OS
OPR recommendation on material alteration	MA Recommendation 1 requests the Planning Authority to make the Plan without this amendment.
Chief Executive's response in the Third CE Report	<p>The submissions received from the OPR and other prescribed bodies oppose the zoning of the subject lands.</p> <p>The zoning of these lands lacks consistency with the Core Strategy of the Draft Plan and have not been considered within the context of the Local Transport Plan. The lands are in a peripheral location, outside the CSO (2016) Settlement Boundary.</p>

PAZ-11 (Sligo Town)	
	<p>Any residential development on these lands would have a substantial, negative impact on the integrity of the landscape of archaeological significance and would undermine the Council's application for the designation of 'The Passage Tomb Landscape of County Sligo' as a UNESCO World Heritage Site.</p> <p>Having regard to the above and as advised in the Second Chief Executive's Report, the CE does not support PAZ-11.</p>
Adopted zoning	2.46 ha new residential uses (nRES) and 0.6 ha open space (OS)

5.2 Draft Direction Item 2(b)(ii)

- b. *Delete the following material alterations from the adopted County Development Plan such that the subject lands revert to as indicated in the draft County Development Plan:*
- (ii) *PAZ 11, i.e. the subject land reverts to Green Belt from New Residential (nRES) and Open Space (OS) and the Development Limit reverts to the draft Plan.*

5.3 Submissions relating to Item 2(b)(ii)

Three submissions have been received in support of the Draft Direction (including one from the NWRA), while two submissions argue against it (including one from a consultant representing the landowner).

Uisce Éireann's submission provides additional details on water service infrastructure.

5.3.1 Submissions supporting the Draft Direction

Submission 15 – Northern and Western Regional Assembly (extract)

<https://consult.sligococo.ie/en/submission/slg-c57-15>

The Assembly, in its submission on the proposed Material Alterations (dated 05 July 2024), did not support Material Amendments now contained in 2. b (i) – (vi) of the draft Ministerial Direction (i.e. PAZ-9, **PAZ-11**, PAZ-12, PAZ-13, PAZ-14 and PAZ-15).

The Assembly's position on these matters has not changed. The Assembly supports the draft Ministerial Direction.

Relevant extracts from the Assembly's previous submission (July 2024) are as follows:

- *The proposed amendments in PAZ-9 and **PAZ 11-15** represent significant amendments to the Sligo Town Plan that would constitute an increase of approximately 66.87 ha of nRES (New Residential) zoned land, primarily at the periphery of the plan area or outside the plan area.*
- *These proposed additional lands would generate between 2,500 and 3,000 additional residential units at the density of 35-50 dwelling units per hectare as required for Regional Growth Centres in the Sustainable and Compact Settlements, Guidelines for Planning Authorities. This would provide for a population increase of approximately 6,000–7,000 people.*
- *This additional zoning does not appear to be realistic nor reasoned, based on the current demographic growth trajectory of Sligo Town.*
- *The additional zonings are not supported by an evidence-based approach, and are peripheral in nature, with 36 ha of proposed zoning nRES outside the current Sligo Town Boundary and negating the objective to deliver compact settlements of scale as set out in the RSES. The proposed Amendments fail to apply the sequential approach to development to support the sustainable compact growth of the town and its environs.*

Submission 20 – Sligo Neolithic Landscape Group

<https://consult.sligococo.ie/en/submission/slg-c57-20>

The Group supports the Draft Direction and requests the retention of Green Belt zoning, indicating that rezoning to nRES would have a negative impact on Recorded Monuments SL014-133 (Ringfort) and Recorded Monuments SL014-23 and SL014-232 (Cairns), the immediate landscape context of these sites, and would undermine Sligo County Council's application for the designation of 'The Passage Tomb Landscape of County Sligo' as a UNESCO World Heritage Site".

For a more detailed summary of this submission, refer to Appendix 2 of this Report.

Submission 96 – Eugene Flynn

<https://consult.sligococo.ie/en/submission/slg-c57-96>

The submission welcomes the Minister's intervention and requests that the land should remain green space into the future. Mr. Flynn states that "*the cultural and sacred landscape of Cairn Hill and the intervisibility with Knocknarae, Carrowmore should be preserved in line with expert recommendations*" and submits that "*there is significant and consistent evidence and precedent that the proposals to rezone PAZ-11 and PAZ-12 are unwise and constitute improper planning*".

5.3.2 Submissions opposing the Draft Direction

Submission 60 – Eunan Friel

<https://consult.sligococo.ie/en/submission/slg-c57-60>

The submission supports the residential zoning of lands at Tonaphubble, indicating that any concerns relating to the potential UNESCO designation "*do not stand up to scrutiny*". It is stated that the lands subject to PAZ-11 are at a much lower level than the "*proposed designation site*", and that housing development on the lands would not impact on the proposed UNESCO designation.

The lands are served by a 5-m wide road with a 1.5-m footpath and can be connected to the drainage network already in place.

For a more detailed summary of this submission, refer to Appendix 2 of this Report.

Submission 63 – Joan Swift

<https://consult.sligococo.ie/en/submission/slg-c57-63>

While the submission is “*mainly supportive of the various points*” made by the OPR, the author considers that the lands subject to PAZ-11 and PAZ-12 are ideally located for housing development, having regard to their proximity to employment, educational and outstanding recreational facilities.

The submission acknowledges the validity of concerns regarding potential interference with the neolithic landscape but argues that “*sensitive construction should help to alleviate any difficulties*” and that residential areas “*can act as a form of passive surveillance of sensitive sites*”.

5.3.3 Submission 73 – Uisce Éireann (extract)

<https://consult.sligococo.ie/en/submission/slg-c57-73>

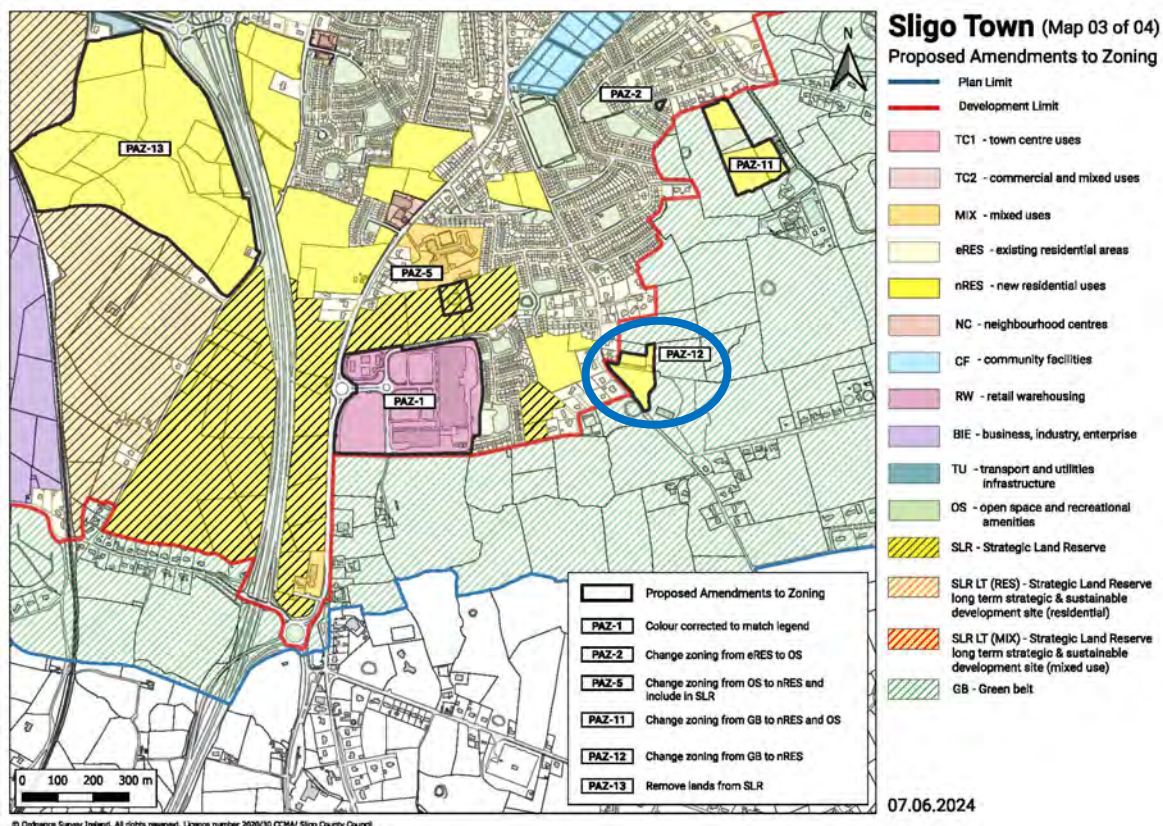
In addition to previous commentary (provided at Proposed Amendments stage), UÉ advises the following in relation to PAZ-11:

- *network extensions greater than 150 m may be required to service the site, based on connection via the existing access on Hollywell Road at the south-eastern extent of the site.*
- *An alternative potential connection point would be to the networks on Tonaphubble Lane, but this may require third party permissions. An upgrade of the existing sewer network, over a distance of approximately 180 m, is also likely to be required.*

5.4 Chief Executive’s recommendation on Item 2(b)(ii)

Consistent with the Chief Executive’s recommendation contained in the Third Chief Executive’s Report in respect of PAZ-11, the subject lands should revert to Green Belt zoning.

6. Draft Direction on PAZ-12



6.1 Background information

PAZ-12 (Sligo Town)	
Site area and location	1.40 ha at Carns (Duke) Td.
Draft Plan zoning	Green Belt (GB)
Proposed amendment	Change the zoning of 1.40 ha from GB to nRES
OPR recommendation on material alteration	MA Recommendation 1 requests the Planning Authority to make the Plan without this amendment.
Chief Executive's response in the Third CE Report	<p>The submissions received from the OPR and other prescribed bodies oppose the zoning of the subject lands.</p> <p>The zoning of these lands lacks consistency with the Core Strategy of the Draft Plan and have not been considered within the context of the Local Transport Plan. The lands are in a peripheral location, outside the CSO (2016) Settlement Boundary.</p>

PAZ-12 (Sligo Town)	
	<p>Any residential development on these lands would have a substantial, negative impact on the integrity of the landscape of archaeological significance and would undermine the Council's application for the designation of 'The Passage Tomb Landscape of County Sligo' as a UNESCO World Heritage Site.</p> <p>Having regard to the above and as advised in the Second Chief Executive's Report, the CE does not support PAZ-11.</p>
Adopted zoning	New residential uses (nRES)

6.2 Draft Direction Item 2(b)(iii)

b. Delete the following material alterations from the adopted County Development Plan such that the subject lands revert to as indicated in the draft County Development Plan:

(iii) PAZ 12, i.e. the subject land reverts to Green Belt (GB) from New Residential (nRES).

6.3 Submissions relating to Item 2(b)(ii)

Two submissions have been received in support of the Draft Direction (including one from the NWRA), while two submissions argue against it (including one from a consultant representing the landowner).

6.3.1 Submissions supporting the Draft Direction

Submission 15 – Northern and Western Regional Assembly (extract)

<https://consult.sligococo.ie/en/submission/slg-c57-15>

The Assembly, in its submission on the proposed Material Alterations (dated 05 July 2024), did not support Material Amendments now contained in 2. b (i) – (vi) of the draft Ministerial Direction (i.e. PAZ-9, PAZ-11, **PAZ-12**, PAZ-13, PAZ-14 and PAZ-15).

The Assembly's position on these matters has not changed. The Assembly supports the draft Ministerial Direction.

Relevant extracts from the Assembly's previous submission (July 2024) are as follows:

- *The proposed amendments in PAZ-9 and **PAZ 11-15** represent significant amendments to the Sligo Town Plan that would constitute an increase of approximately 66.87 ha of nRES (New Residential) zoned land, primarily at the periphery of the plan area or outside the plan area.*
- *These proposed additional lands would generate between 2,500 and 3,000 additional residential units at the density of 35-50 dwelling units per hectare as required for Regional Growth Centres in the Sustainable and Compact Settlements, Guidelines for Planning Authorities. This would provide for a population increase of approximately 6,000–7,000 people.*

- *This additional zoning does not appear to be realistic nor reasoned, based on the current demographic growth trajectory of Sligo Town.*
- *The additional zonings are not supported by an evidence-based approach, and are peripheral in nature, with 36 ha of proposed zoning nRES outside the current Sligo Town Boundary and negating the objective to deliver compact settlements of scale as set out in the RSES. The proposed Amendments fail to apply the sequential approach to development to support the sustainable compact growth of the town and its environs.*

Submission 20 – Sligo Neolithic Landscape Group

<https://consult.sligococo.ie/en/submission/slg-c57-20>

The Group supports the Draft Direction and requests the retention of the Green Belt zoning, indicating that rezoning to nRES would have a negative impact on Recorded Monuments SL014-133 (Ringfort) and Recorded Monuments SL014-23 and SL014-232 (Cairns), the immediate landscape context of these sites, and would undermine Sligo County Council's application for the designation of 'The Passage Tomb Landscape of County Sligo' as a UNESCO World Heritage Site.

For a more detailed summary of this submission, refer to Appendix 2 of this Report.

Submission 96 – Eugene Flynn

<https://consult.sligococo.ie/en/submission/slg-c57-96>

The submission welcomes the Minister's intervention and requests that the land should remain green space into the future. Mr. Flynn states that *"the cultural and sacred landscape of Cairn Hill and the intervisibility with Knocknarae, Carrowmore should be preserved in line with expert recommendations"* and states that *"there is significant and consistent evidence and precedent that the proposals to rezone PAZ-11 and PAZ-12 are unwise and constitute improper planning"*.

6.3.2 Submissions opposing the Draft Direction

Submission 63 – Joan Swift

<https://consult.sligococo.ie/en/submission/slg-c57-63>

While the submission is *"mainly supportive of the various points"* made by the OPR, the author considers that the lands subject to PAZ-11 and PAZ-12 are ideally located for housing development, having regard to their proximity to employment, educational and outstanding recreational facilities.

The submission acknowledges the validity of concerns regarding potential interference with the neolithic landscape but argues that *"sensitive construction should help to alleviate any difficulties"* and that residential areas *"can act as a form of passive surveillance of sensitive sites"*.

Submission 72 – Beldare Homes

<https://consult.sligococo.ie/en/submission/slg-c57-72>

This submission, prepared by consultant Robert Keran on behalf of Beldare Homes, is one of six with similar contents.

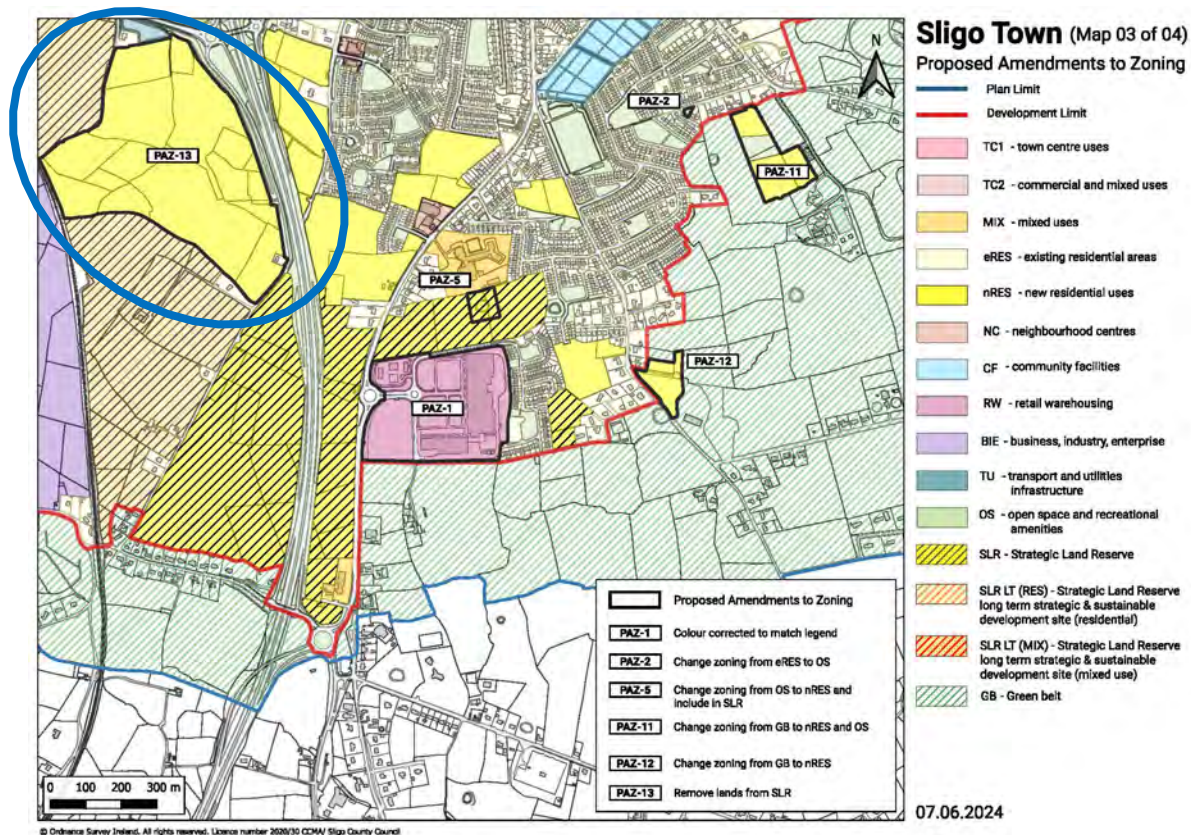
In essence, the submission supports the retention of New Residential (nRES) zoning for the lands subject to PAZ-12. The consultant seeks to demonstrate that *"the site is sequentially preferable, serviced or capable of being serviced, and within or appropriate to be within the settlement boundary, would not adversely affect natural or cultural heritage"*.

For a more detailed summary of this submission, please refer to Appendix 2 of this Report.

6.4 Chief Executive's recommendation on Item 2(b)(iii)

Consistent with the Chief Executive's recommendation contained in the Third Chief Executive's Report in respect of PAZ-12, the subject lands should revert to Green Belt zoning.

7. Draft Direction on PAZ-13



7.1 Background information

PAZ-13 (Sligo Town)	
Site area and location	27.08 ha at Caltragh Td. and Magheraboy Td.
Draft Plan zoning	Strategic Land Reserve (MIX)
Proposed amendment	Remove 27.08 ha of nRES from the Strategic Land Reserve (SLR)
OPR recommendation on material alteration	MA Recommendation 1 requests the Planning Authority to make the Plan without this amendment.
Chief Executive's response in the Third CE Report	<p>The submissions received from the OPR and other prescribed bodies oppose the zoning of the subject lands.</p> <p>There is no planning rationale for releasing this amount of land from the SLR. The proposed amendment would constitute a significant departure from the Core Strategy of the Draft Plan by increasing the amount of land zoned for new residential uses from 86.85 ha to 113 ha (an increase of 31%).</p>

PAZ-13 (Sligo Town)	
	<p>The lands are outside the CSO (2016) Settlement Boundary, in a peripheral location and have not been considered within the context of the Local Transport Plan. The proposed redesignation does not follow the sequential approach to zoning.</p> <p>Having regard to the above and as advised in the Second Chief Executive's Report, the CE does not support PAZ-13.</p>
Adopted zoning	New residential uses (nRES)

7.2 Draft Direction Item 2(b)(iv)

b. Delete the following material alterations from the adopted County Development Plan such that the subject lands revert to as indicated in the draft County Development Plan:

(iv) PAZ 13, i.e. the subject land reverts to Strategic Land Reserve (SLR) from New Residential (nRES).

7.3 Submissions relating to Item 2(b)(iv)

Two submissions have been received in relation to this item: one from the NWRA (supporting the Draft Direction) and the other from a consultant representing the landowners (opposing the Draft Direction).

7.3.1 Submission supporting the Draft Direction

Submission 15 – Northern and Western Regional Assembly (extract)

<https://consult.sligococo.ie/en/submission/slg-c57-15>

The Assembly, in its submission on the proposed Material Alterations (dated 05 July 2024), did not support Material Amendments now contained in 2. b (i) – (vi) of the draft Ministerial Direction (i.e. PAZ-9, PAZ-11, PAZ-12, **PAZ-13**, PAZ-14 and PAZ-15).

The Assembly's position on these matters has not changed. The Assembly supports the draft Ministerial Direction.

Relevant extracts from the Assembly's previous submission (July 2024) are as follows:

- *The proposed amendments in PAZ-9 and **PAZ 11-15** represent significant amendments to the Sligo Town Plan that would constitute an increase of approximately 66.87 ha of nRES (New Residential) zoned land, primarily at the periphery of the plan area or outside the plan area.*

- *These proposed additional lands would generate between 2,500 and 3,000 additional residential units at the density of 35-50 dwelling units per hectare as required for Regional Growth Centres in the Sustainable and Compact Settlements, Guidelines for Planning Authorities. This would provide for a population increase of approximately 6,000–7,000 people.*
- *This additional zoning does not appear to be realistic nor reasoned, based on the current demographic growth trajectory of Sligo Town.*
- *The additional zonings are not supported by an evidence-based approach, and are peripheral in nature, with 36 ha of proposed zoning nRES outside the current Sligo Town Boundary and negating the objective to deliver compact settlements of scale as set out in the RSES. The proposed Amendments fail to apply the sequential approach to development to support the sustainable compact growth of the town and its environs.*

7.3.2 Submission opposing the Draft Direction

Submission 91 – Margaret and Walter Burke

<https://consult.sligococo.ie/en/submission/slg-c57-91>

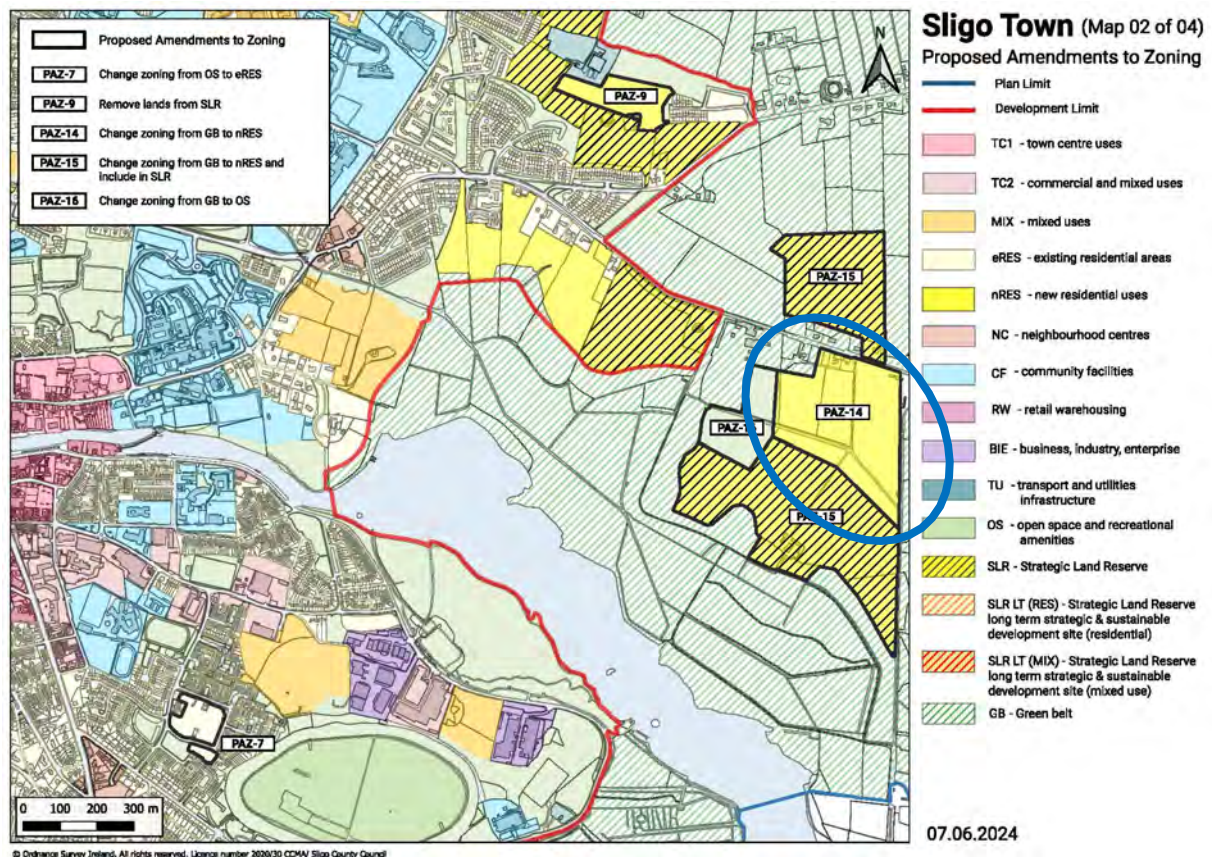
The submission supports the New Residential (nRES) zoning of the lands subject to PAZ-13 in Sligo Town instead of Strategic Land Reserve (SLR), arguing that *“the lands are highly accessible, benefitting from their proximity to a wide array of social infrastructure necessary to support new residential communities. It also benefits from the presence of necessary enabling infrastructure that includes the newly complete WDR, as well as access to water and wastewater services. Zoning of the site is consistent with the principle of compact growth, as it is within the Development Limit of Sligo Town and would provide for consolidation of the built-up area. The land is contiguous to existing and permitted development in Caltragh east of the N4”*.

For a more detailed summary of this submission, refer to Appendix 2 of this Report.

7.4 Chief Executive’s recommendation on Item 2(b)(iv)

Consistent with the Chief Executive’s recommendation contained in the Third Chief Executive’s Report in respect of PAZ-13, the subject lands should revert to Strategic Land Reserve.

8. Draft Direction on PAZ-14



8.1 Background information

PAZ-14 (Sligo Town)	
Site area and location	10.26 ha at Hazelwood Demesne Td.
Draft Plan zoning	Green Belt
Proposed amendment	Change the zoning of 10.26 ha from GB to nRES
OPR recommendation on material alteration	MA Recommendation 1 requests the Planning Authority to make the Plan without this amendment.
Chief Executive's response in the Third CE Report	<p>The subject lands are neither fully serviced (Tier 1), nor serviceable during the six-year period of the CDP 2024–2030 (Tier 2).</p> <p>Zoning an additional 10.26 ha for residential purposes lacks consistency with the Core Strategy of the Draft Plan. No appropriate rationale has been provided for the addition of these lands to the 86.85 ha already zoned nRES and MIX in the Draft Sligo Town Plan.</p>

PAZ-14 (Sligo Town)	
	<p>The lands are outside the CSO (2016) Settlement Boundary, in a peripheral location which leapfrogs lands in the SLR and Green Belt and have not been considered within the context of the Local Transport Plan. The proposed rezoning does not follow the sequential approach to zoning.</p> <p>Having regard to the above and as advised in the Second Chief Executive's Report, the CE does not support PAZ-14.</p>
Adopted zoning	New residential uses (nRES)

8.2 Draft Direction Item 2(b)(v)

b. Delete the following material alterations from the adopted County Development Plan such that the subject lands revert to as indicated in the draft County Development Plan:

(v) PAZ 14, i.e. the subject land reverts to Green Belt (GB) from New Residential (nRES).

8.3 Submissions relating to Item 2(b)(v)

Three submissions have been received in support of the Draft Direction (including one from the NWRA), while 26 submissions argue against it (including one from a consultant representing the landowners).

Uisce Éireann's submission provides additional details on water service infrastructure.

8.3.1 Submissions supporting the Draft Direction

Submission 15 – Northern and Western Regional Assembly (extract)

<https://consult.sligococo.ie/en/submission/slg-c57-15>

The Assembly, in its submission on the proposed Material Alterations (dated 05 July 2024), did not support Material Amendments now contained in 2. b (i) – (vi) of the draft Ministerial Direction (i.e. PAZ 9, PAZ 11, PAZ 12, PAZ 13, **PAZ 14** and PAZ 15).

The Assembly's position on these matters has not changed. The Assembly supports the draft Ministerial Direction.

Relevant extracts from the Assembly's previous submission (July 2024) are as follows:

- *The proposed amendments in PAZ 9 and **PAZ 11-15** represent significant amendments to the Sligo Town Plan that would constitute an increase of approximately 66.87 ha of nRES (New Residential) zoned land, primarily at the periphery of the plan area or outside the plan area.*

- *These proposed additional lands would generate between 2,500 and 3,000 additional residential units at the density of 35-50 dwelling units per hectare as required for Regional Growth Centres in the Sustainable and Compact Settlements, Guidelines for Planning Authorities. This would provide for a population increase of approximately 6,000–7,000 people.*
- *This additional zoning does not appear to be realistic nor reasoned, based on the current demographic growth trajectory of Sligo Town.*
- *The additional zonings are not supported by an evidence-based approach, and are peripheral in nature, with 36 ha of proposed zoning nRES outside the current Sligo Town Boundary and negating the objective to deliver compact settlements of scale as set out in the RSES. The proposed Amendments fail to apply the sequential approach to development to support the sustainable compact growth of the town and its environs.*

Submission 25 – Thomas Macdonald

<https://consult.sligococo.ie/en/submission/slg-c57-25>

The submission objects to the proposed rezonings PAZ-14 (from Green Belt to New Residential), and PAZ-15 (from Green Belt to New Residential and Strategic land Reserve), expressing concerns that the advice offered by different agencies of the State has been ignored by Councillors.

Submission 26 – Beatrice Macdonald

<https://consult.sligococo.ie/en/submission/slg-c57-26>

The submission contends that PAZ-14 and PAZ-15, proposed by Councillors, are “at odds” with the rules and regulations for housing, town planning and development, transport, services, and environment. Elected representatives should represent “*the people and not the interests of property developers*”.

8.3.2 Submissions opposing the Draft Direction

Submission 36 – John Cox

<https://consult.sligococo.ie/en/submission/slg-c57-36>

Without specifically mentioning PAZ-14 or PAZ-15, the submission supports the zoning lands at Hazelwood, in the vicinity of large employers, in a community that has capacity in schools and sporting organizations but has reduced numbers of young people.

Submission 38 – Edel Hackett

<https://consult.sligococo.ie/en/submission/slg-c57-38>

Without specifically mentioning PAZ-14 or PAZ-15, the submission supports the construction of 600 houses at Hazelwood. It states that it is impossible to buy a house in the Calry area, which has an elderly population, but needs new families of a younger age group.

Submission 39 – Joe Gonley

<https://consult.sligococo.ie/en/submission/slg-c57-39>

The submission supports housing developments at Hazelwood, an area which is close to the ATU, Sligo Hospital and several enterprises.

Submission 50 – Patrick Coen

<https://consult.sligococo.ie/en/submission/slg-c57-50>

The submission requests that the lands remain as currently zoned and that the regional road R-286 be “reviewed” to meet domestic and business needs of this area.

Submission 52 – David Cummins

<https://consult.sligococo.ie/en/submission/slg-c57-52>

Without specifically mentioning PAZ-14 or PAZ-15, the submission supports the zoning of lands at Hazelwood. Employers such as the ATU, hospital, Abbvie are present the area, but there is no accommodation for workers. Additional housing development would “boost” the local community, schools and sports organisations.

Submission 53 – Deirdre Norton

<https://consult.sligococo.ie/en/submission/slg-c57-53>

Without specifically mentioning PAZ-14 or PAZ-15, the submission supports development at Hazelwood, which will house more families, create more jobs, contribute to local schools and sports clubs. The area is close St Angela’s college, ATU, the Hospital and companies like Abbots, which makes it desirable for living.

Submission 55 – Daithí Hand

<https://consult.sligococo.ie/en/submission/slg-c57-55>

The submission welcomes the Draft Directive regarding PAZ-14 and PAZ-15 (probably due to a misunderstanding of the Direction’s intention) and highlights the need for housing in the Calry area, which “services the ATU and the hospital” in terms of accommodation.

Submission 56 – David Collery

<https://consult.sligococo.ie/en/submission/slg-c57-56>

The submission supports the residential zoning of the lands subject to PAZ-14 and PAZ-15, indicating that “*there is an overwhelming demand for housing in this area*”. It is further stated that the area proposed to be zoned “*is serviced with a connection to Sligo wastewater treatment plant*”. The Hazelwood area is described as “*extremely well serviced with facilities*” and the development is said to be welcomed by the community.

Submission 79 – Beldare Homes

<https://consult.sligococo.ie/en/submission/slg-c57-79>

This submission, prepared by consultant Robert Keran on behalf of Beldare Homes, is one of six with similar contents. In essence, the submission supports the retention of New Residential (nRES) zoning for the lands subject to PAZ-14, retention of the Strategic Land Reserve (SLR) designation for the lands subject to PAZ-15 (and, implicitly, the associated retention of Open Space (OS) zoning for the lands subject to PAZ-16).

The consultant seeks to demonstrate that *“the site is sequentially preferable, serviced or capable of being serviced, and within or appropriate to be within the settlement boundary, would not adversely affect natural or cultural heritage”*.

For a more detailed summary of this submission, please refer to Appendix 2 of this Report.

Submission 84 – Chris Gonley

<https://consult.sligococo.ie/en/submission/slg-c57-84>

Without specifically mentioning PAZ-14 or PAZ-15, the submission supports the zoning of lands at Hazelwood. It states that there is a real need for housing and Community facilities in the area, which has a number of large employers, and there is also a need for student accommodation.

Submission 85 – Mark Kelly

<https://consult.sligococo.ie/en/submission/slg-c57-85>

The submission supports the rezoning of lands in Hazelwood, i.e. PAZ-14 and PAZ-15. The author urges the Minister *“to consider the zoning of PAZ 57, 14 & 15 as well as all of the other proposed residential zoning locations as vital to the growth of Sligo and the Northwest”*.

Submission 87 – Barry White

<https://consult.sligococo.ie/en/submission/slg-c57-87>

The submission supports the proposed zoning of lands under PAZ-14 and PAZ-15, which are located *“between the ATU and St Angelas, serviced by a bus route, near key employers such as ATU, AbbVie and Sligo University Hospital”* and are *“serviced by new recreational trails which run along the boundary of the site”*.

Submission 89 – Erin Regan

<https://consult.sligococo.ie/en/submission/slg-c57-89>

The submission supports the rezoning of lands in Hazelwood, i.e. PAZ-14 and PAZ-15. The author urges the Minister *“to consider the zoning of PAZ 57, 14 & 15 as well as all of the other proposed residential zoning locations as vital to the growth of Sligo and the Northwest”*.

Submission 92 – Kelly Energy and Engineering Services

<https://consult.sligococo.ie/en/submission/slg-c57-92>

The submission supports the rezoning of lands in Hazelwood, i.e. PAZ-14 and PAZ-15. The author urges the Minister *“to consider the zoning of PAZ 57, 14 & 15 as well as all of the other proposed residential zoning locations as vital to the growth of Sligo and the Northwest”*.

Submission 94 – Ronan Gray

<https://consult.sligococo.ie/en/submission/slg-c57-94>

The submission supports the rezoning of lands in Hazelwood, i.e. PAZ-14 and PAZ-15. The author urges the Minister *"to consider the zoning of PAZ 57, 14 & 15 as well as all of the other proposed residential zoning locations as vital to the growth of Sligo and the Northwest"*.

Submission 95 – Anne McConnon

<https://consult.sligococo.ie/en/submission/slg-c57-95>

The submission supports the rezoning of lands in Hazelwood, i.e. PAZ-14 and PAZ-15. The author urges the Minister *"to consider the zoning of PAZ 57, 14 & 15 as well as all of the other proposed residential zoning locations as vital to the growth of Sligo and the Northwest"*.

Submission 97 – Margaret Malarney

<https://consult.sligococo.ie/en/submission/slg-c57-97>

The submission supports the rezoning of lands in Hazelwood, i.e. PAZ-14 and PAZ-15. The author urges the Minister *"to consider the zoning of PAZ 57, 14 & 15 as well as all of the other proposed residential zoning locations as vital to the growth of Sligo and the Northwest"*.

Submission 99 – Rachel Byrne

<https://consult.sligococo.ie/en/submission/slg-c57-99>

The submission supports the rezoning of lands in Hazelwood, i.e. PAZ-14 and PAZ-15. The author urges the [Minister?] *"to consider the zoning of PAZ 57 and PAZ 14,15 and any other site that will benefit the housing supply in Sligo"*.

Submission 100 – Rory Kelly

<https://consult.sligococo.ie/en/submission/slg-c57-100>

The submission supports the rezoning of lands throughout County Sligo, in particular in Strandhill (PAZ-57), Hazelwood (PAZ-14 and PAZ-15). The author urges the Minister *"to consider the zoning of PAZ 57, 14 & 15 as well as all of the other proposed residential zoning locations as vital to the growth of Sligo and the Northwest"*.

Submission 101 – Gaven Heeran

<https://consult.sligococo.ie/en/submission/slg-c57-101>

The submission supports PAZ-57, PAZ-14 and PAZ-15, indicating that *"there is an urgent requirement for housing in the Strandhill area"* and suggesting that *"the site should now be released from SLR and zoned as New Residential in order to plan for the sustainable and proper development of Strandhill village and Hazelwood"*.

Submission 102 – Helen Connaughton

<https://consult.sligococo.ie/en/submission/slg-c57-102>

The submission supports the rezoning of lands in Strandhill and Hazelwood, i.e. PAZ-57, PAZ-14 and PAZ-15. The author urges [the Minister?] *“to allow the rezoning of these lands to assist in the growth of the town we love and wish to continue to live in”*.

Submission 103 – Paddy Flynn

<https://consult.sligococo.ie/en/submission/slg-c57-103>

The submission supports the rezoning of lands in both Strandhill and Hazelwood and urges the Minister *“to consider the zoning of PAZ-57, 14 and 15 as well as all of the other proposed residential zoning locations as vital to the growth of Sligo and the Northwest”*.

Submission 104 – Peter Clarke

<https://consult.sligococo.ie/en/submission/slg-c57-104>

The submission is titled *“PAZ-57, 14, 15”* and states that *“we need more land for housing, absolutely crazy not to be zoning these lands”*.

Submission 105 – Saoirse Faughnan

<https://consult.sligococo.ie/en/submission/slg-c57-105>

The submission supports the zoning of lands under PAZ-14 and PAZ-15, as *“this site has the potential to deliver housing to serve students due to its location beside the colleges”*.

Submission 106 – Thomas Regan

<https://consult.sligococo.ie/en/submission/slg-c57-106>

The submission is titled *“PAZ-57 and PAZ-14,15”* and states: *“More housing in Sligo and surrounding areas needed”*.

8.3.3 Submission 73 – Uisce Éireann (extract)

<https://consult.sligococo.ie/en/submission/slg-c57-73>

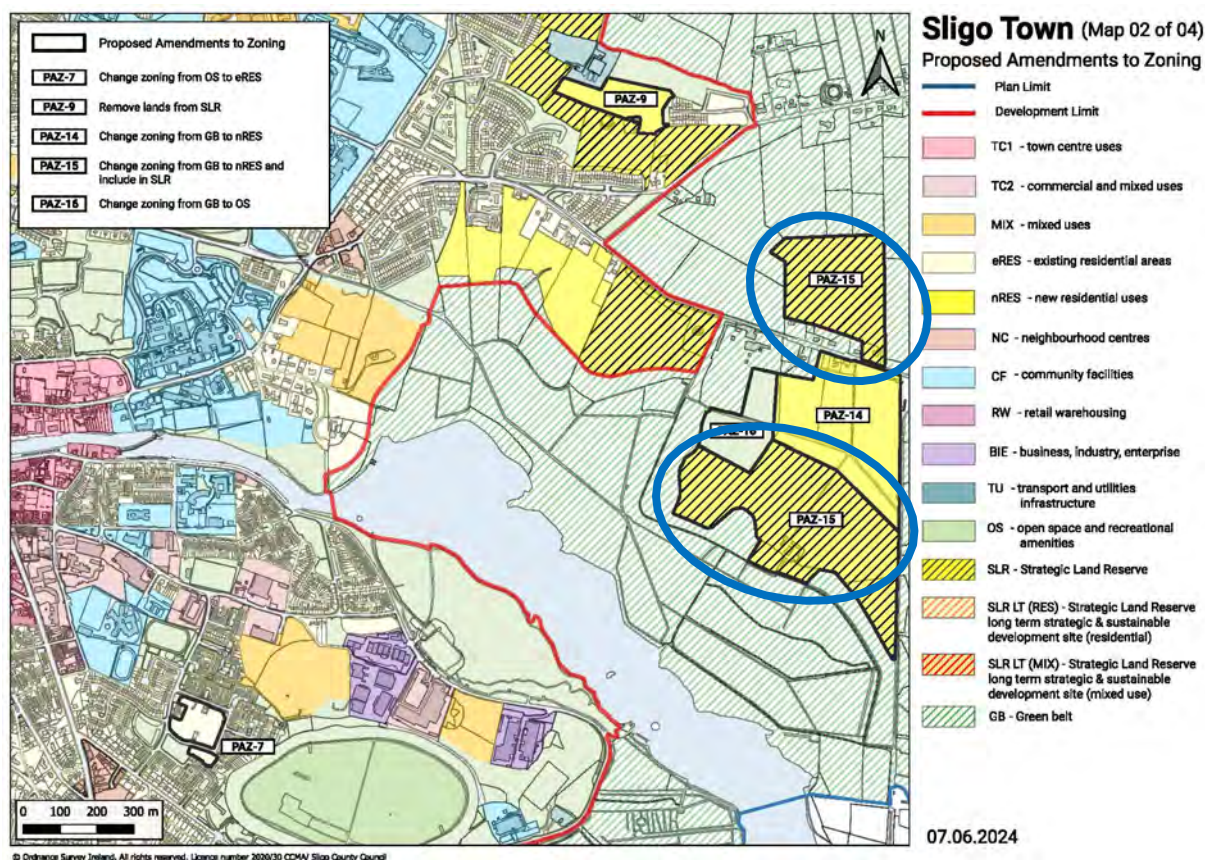
In addition to previous commentary (provided at Proposed Amendments stage), UÉ advises the following in relation to PAZ-14 and PAZ-15:

- *Upgrade of existing AC watermain over a length of almost 900 m required to cater for PAZ-14.*
- *Nearest sewer network is approximately 1.2 km from the site. Connection is likely to be via pumped rising main and/or gravity sewer. On-site storage may also be required to mitigate impacts on downstream network.*
- *These works are not included in UÉ's Investment Plan and must be developer funded. Exact requirements for connection are normally determined at Connection Application stage. New connections to Uisce Éireann networks are subject to the Connections Charging Policy.*
- *Further phases of development may necessitate strategic upgrades.*

8.4 Chief Executive's recommendation on Item 2(b)(v)

Consistent with the Chief Executive's recommendation contained in the Third Chief Executive's Report in respect of PAZ-14, the subject lands should revert to Green Belt zoning.

9. Draft Direction on PAZ-15



9.1 Background information

PAZ-15 (Sligo Town)	
Site area and location	23.19 ha at Hazelwood Demesne Td.
Draft Plan zoning	Green Belt
Proposed amendment	Change the zoning of 23.19 ha from GB to nRES and include in the Strategic Land Reserve (SLR)
OPR recommendation on material alteration	MA Recommendation 1 and MA Recommendation 8 request the Planning Authority to make the Plan without this amendment.
Chief Executive's response in the Third CE Report	<p>The subject lands are neither fully serviced (Tier 1), nor serviceable during the six-year period of the CDP 2024–2030 (Tier 2).</p> <p>The lands are outside the CSO (2016) Settlement Boundary, in a peripheral location which leapfrogs lands in the SLR and green belt and have not been</p>

PAZ-15 (Sligo Town)	
	<p>considered within the context of the Local Transport Plan. The proposed rezoning does not follow the sequential approach to zoning.</p> <p>Having regard to the above and as advised in the Second Chief Executive's Report, the CE does not support PAZ-15.</p>
Adopted zoning	New residential uses, Strategic Land Reserve (nRES/SLR)

9.2 Draft Direction Item 2(b)(vi)

b. Delete the following material alterations from the adopted County Development Plan such that the subject lands revert to as indicated in the draft County Development Plan:

- (vi) PAZ 15, i.e. the subject land reverts to Green Belt (GB) from New Residential (nRES) and Strategic Land Reserve (SLR).*

9.3 Submissions relating to Item 2(b)(vi)

Three submissions have been received in support of the Draft Direction (including one from the NWRA), while 25 submissions (including one from a consultant representing the landowners) argue in favour of retaining the residential zoning of the lands, thereby opposing the Draft Direction.

Uisce Éireann's submission provides additional details on water service infrastructure.

9.3.1 Submissions supporting the Draft Direction

Submission 15 – Northern and Western Regional Assembly (extract)

<https://consult.sligococo.ie/en/submission/slg-c57-15>

The Assembly, in its submission on the proposed Material Alterations (dated 05 July 2024), did not support Material Amendments now contained in 2. b (i) – (vi) of the draft Ministerial Direction (i.e. PAZ 9, PAZ 11, PAZ 12, PAZ 13, PAZ 14 and **PAZ 15**).

The Assembly's position on these matters has not changed. The Assembly supports the draft Ministerial Direction.

Relevant extracts from the Assembly's previous submission (July 2024) are as follows:

- *The proposed amendments in PAZ 9 and **PAZ 11-15** represent significant amendments to the Sligo Town Plan that would constitute an increase of approximately 66.87 ha of nRES (New Residential) zoned land, primarily at the periphery of the plan area or outside the plan area.*

- *These proposed additional lands would generate between 2,500 and 3,000 additional residential units at the density of 35-50 dwelling units per hectare as required for Regional Growth Centres in the Sustainable and Compact Settlements, Guidelines for Planning Authorities. This would provide for a population increase of approximately 6,000–7,000 people.*
- *This additional zoning does not appear to be realistic nor reasoned, based on the current demographic growth trajectory of Sligo Town.*
- *The additional zonings are not supported by an evidence-based approach, and are peripheral in nature, with 36 ha of proposed zoning nRES outside the current Sligo Town Boundary and negating the objective to deliver compact settlements of scale as set out in the RSES. The proposed Amendments fail to apply the sequential approach to development to support the sustainable compact growth of the town and its environs.*

Submission 25 – Thomas Macdonald

<https://consult.sligococo.ie/en/submission/slg-c57-25>

The submission objects to the proposed rezonings PAZ-14 (from Green Belt to New Residential), and PAZ-15 (from Green Belt to New Residential and Strategic land Reserve), expressing concerns that the advice offered by different agencies of the State has been ignored by Councillors.

Submission 26 – Beatrice Macdonald

<https://consult.sligococo.ie/en/submission/slg-c57-26>

The submission contends that PAZ-14 and PAZ-15, proposed by Councillors, are “at odds” with the rules and regulations for housing, town planning and development, transport, services, and environment. Elected representatives should represent “*the people and not the interests of property developers*”.

The southern end of PAZ-15 borders a biodiversity-rich Alluvial Woodland, of which there are only five in Ireland. There is no clear line of demarcation.

9.3.2 Submissions opposing the Draft Direction

Submission 36 – John Cox

<https://consult.sligococo.ie/en/submission/slg-c57-36>

Without specifically mentioning PAZ-14 or PAZ-15, the submission supports the zoning lands at Hazelwood, in the vicinity of large employers, in a community that has capacity in schools and sporting organizations but has reduced numbers of young people.

Submission 38 – Edel Hackett

<https://consult.sligococo.ie/en/submission/slg-c57-38>

Without specifically mentioning PAZ-14 or PAZ-15, the submission supports the construction of 600 houses at Hazelwood. It states that it is impossible to buy a house in the Calry area, which has an elderly population, but needs new families of a younger age group.

Submission 39 – Joe Gonley

<https://consult.sligococo.ie/en/submission/slg-c57-39>

The submission supports housing developments at Hazelwood, an area which is close to the ATU, Sligo Hospital and several enterprises.

Submission 50 – Patrick Coen

<https://consult.sligococo.ie/en/submission/slg-c57-50>

The submission requests that the lands remain as currently zoned and that the regional road R-286 be “reviewed” to meet domestic and business needs of this area.

Submission 52 – David Cummins

<https://consult.sligococo.ie/en/submission/slg-c57-52>

Without specifically mentioning PAZ-14 or PAZ-15, the submission supports the zoning of lands at Hazelwood. Employers such as the ATU, hospital, Abbvie are present the area, but there is no accommodation for workers. Additional housing development would “boost” the local community, schools and sports organisations.

Submission 53 – Deirdre Norton

<https://consult.sligococo.ie/en/submission/slg-c57-53>

Without specifically mentioning PAZ-14 or PAZ-15, the submission supports development at Hazelwood, which will house more families, create more jobs, contribute to local schools and sports clubs. The area is close St Angela’s college, ATU, the Hospital and companies like Abbots, which makes it desirable for living.

Submission 55 – Daithí Hand

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The submission welcomes the Draft Directive regarding PAZ-14 and PAZ-15 (probably due to a misunderstanding of the Direction’s intention) and highlights the need for housing in the Calry area, which “services the ATU and the hospital” in terms of accommodation.

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The submission supports the residential zoning of the lands subject to PAZ-14 and PAZ-15, indicating that “*there is an overwhelming demand for housing in this area*”. It is further stated that the area proposed to be zoned “*is serviced with a connection to Sligo wastewater treatment plant*”. The Hazelwood area is described as “*extremely well serviced with facilities*” and the development is said to be welcomed by the community.

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This submission, prepared by consultant Robert Keran on behalf of Beldare Homes, is one of six with similar contents. In essence, the submission supports the retention of New Residential (nRES) zoning for the lands subject to PAZ-14, retention of the Strategic Land Reserve (SLR) designation for the lands subject to PAZ-15 (and, implicitly, the associated retention of Open Space (OS) zoning for the lands subject to PAZ-16).

The consultant seeks to demonstrate that *“the site is sequentially preferable, serviced or capable of being serviced, and within or appropriate to be within the settlement boundary, would not adversely affect natural or cultural heritage”*.

For a more detailed summary of this submission, please refer to Appendix 2 of this Report.

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Without specifically mentioning PAZ-14 or PAZ-15, the submission supports the zoning of lands at Hazelwood. It states that there is a real need for housing and Community facilities in the area, which has a number of large employers, and there is also a need for student accommodation.

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The submission supports the proposed zoning of lands under PAZ-14 and PAZ-15, which are located *“between the ATU and St Angelas, serviced by a bus route, near key employers such as ATU, Abbie and Sligo University Hospital”* and are *“serviced by new recreational trails which run along the boundary of the site”*.

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The submission supports the rezoning of lands in Hazelwood, i.e. PAZ-14 and PAZ-15. The author urges the Minister *“to consider the zoning of PAZ 57, 14 & 15 as well as all of the other proposed residential zoning locations as vital to the growth of Sligo and the Northwest”*.

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The submission supports the rezoning of lands in Hazelwood, i.e. PAZ-14 and PAZ-15. The author urges the Minister *“to consider the zoning of PAZ 57, 14 & 15 as well as all of the other proposed residential zoning locations as vital to the growth of Sligo and the Northwest”*.

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Submission 97 – Margaret Malarney

<https://consult.sligococo.ie/en/submission/slg-c57-97>

The submission supports the rezoning of lands in Hazelwood, i.e. PAZ-14 and PAZ-15. The author urges the Minister *“to consider the zoning of PAZ 57, 14 & 15 as well as all of the other proposed residential zoning locations as vital to the growth of Sligo and the Northwest”*.

Submission 99 – Rachel Byrne

<https://consult.sligococo.ie/en/submission/slg-c57-99>

The submission supports the rezoning of lands in Hazelwood, i.e. PAZ-14 and PAZ-15. The author urges the [Minister?] *“to consider the zoning of PAZ 57 and PAZ 14,15 and any other site that will benefit the housing supply in Sligo”*.

Submission 100 – Rory Kelly

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The submission supports the rezoning of lands throughout County Sligo, in particular in Strandhill (PAZ-57), Hazelwood (PAZ-14 and PAZ-15). The author urges the Minister *“to consider the zoning of PAZ 57, 14 & 15 as well as all of the other proposed residential zoning locations as vital to the growth of Sligo and the Northwest”*.

Submission 101 – Gaven Heeran

<https://consult.sligococo.ie/en/submission/slg-c57-101>

The submission supports PAZ-57, PAZ-14 and PAZ-15, indicating that *“there is an urgent requirement for housing in the Strandhill area”* and suggesting that *“the site should now be released from SLR and zoned as New Residential in order to plan for the sustainable and proper development of Strandhill village and Hazelwood”*.

Submission 102 – Helen Connaughton

<https://consult.sligococo.ie/en/submission/slg-c57-102>

The submissions supports the rezoning of lands in Strandhill and Hazelwood, i.e. PAZ-57, PAZ-14 and PAZ-15. The author urges [the Minister?] *“to allow the rezoning of these lands to assist in the growth of the town we love and wish to continue to live in”*.

Submission 103 – Paddy Flynn

<https://consult.sligococo.ie/en/submission/slg-c57-103>

The submission supports the rezoning of lands in both Strandhill and Hazelwood and urges the Minister *“to consider the zoning of PAZ-57, 14 and 15 as well as all of the other proposed residential zoning locations as vital to the growth of Sligo and the Northwest”*.

Submission 104 – Peter Clarke

<https://consult.sligococo.ie/en/submission/slg-c57-104>

The submission is titled *“PAZ-57, 14, 15”* and states that *“we need more land for housing, absolutely crazy not to be zoning these lands”*.

Submission 105 – Saoirse Faughnan

<https://consult.sligococo.ie/en/submission/slg-c57-105>

The submission supports the zoning of lands under PAZ-14 and PAZ-15, as *“this site has the potential to deliver housing to serve students due to its location beside the colleges”*.

Submission 106 – Thomas Regan

<https://consult.sligococo.ie/en/submission/slg-c57-106>

The submission is titled *“PAZ-57 and PAZ-14,15”* and states: *“More housing in Sligo and surrounding areas needed”*.

9.3.3 Submission 73 – Uisce Éireann (extract)

<https://consult.sligococo.ie/en/submission/slg-c57-73>

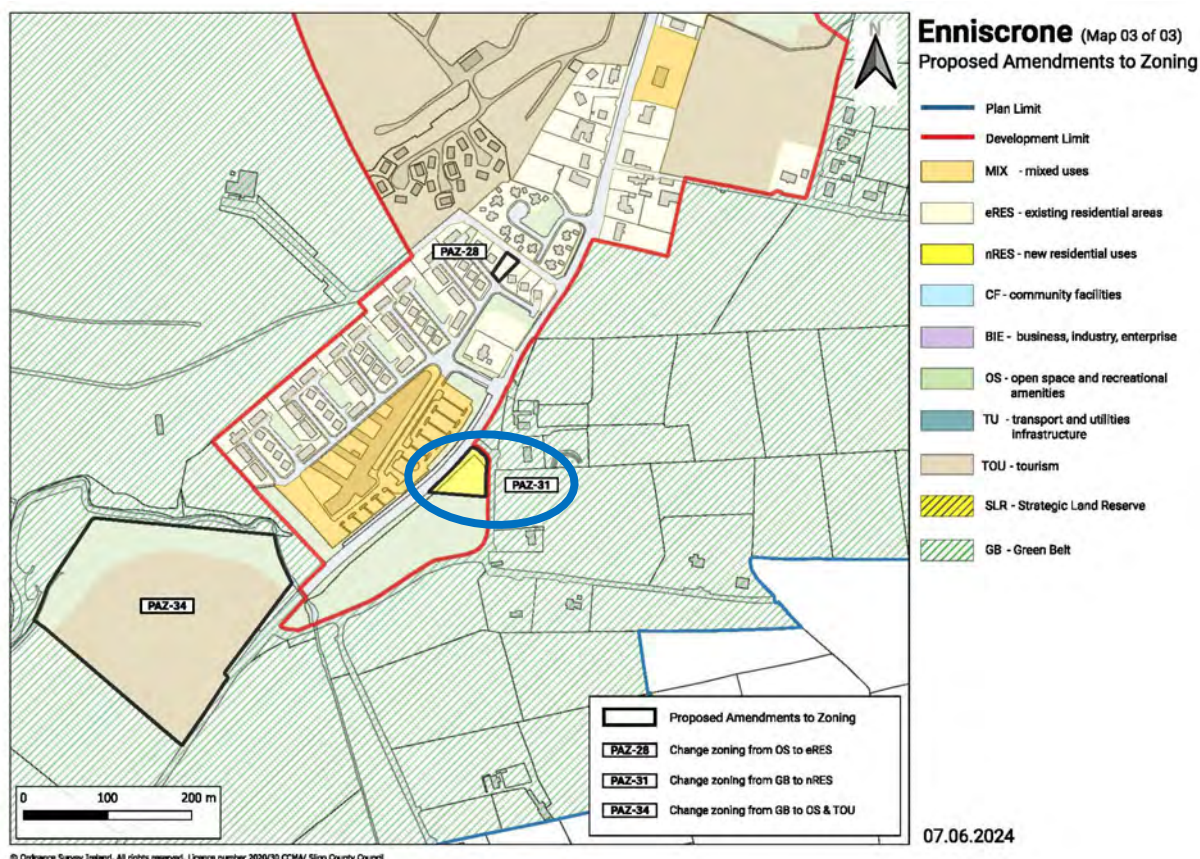
In addition to previous commentary (provided at Proposed Amendments stage), UÉ advises the following in relation to PAZ-14 and PAZ-15:

- *Upgrade of existing AC watermain over a length of almost 900 m required to cater for PAZ-14.*
- *Nearest sewer network is approximately 1.2 km from the site. Connection is likely to be via pumped rising main and/or gravity sewer. On-site storage may also be required to mitigate impacts on downstream network.*
- *These works are not included in UÉ's Investment Plan and must be developer funded. Exact requirements for connection are normally determined at Connection Application stage. New connections to Uisce Éireann networks are subject to the Connections Charging Policy.*
- *Further phases of development may necessitate strategic upgrades.*

9.4 Chief Executive's recommendation on Item 2(b)(vi)

Consistent with the Chief Executive's recommendation contained in the Third Chief Executive's Report in respect of PAZ-15, the subject lands should revert to Green Belt zoning.

10. Draft Direction on PAZ-31



insert map

10.1 Background information

PAZ-31 (Enniscrone)	
Site area and location	0.26 ha at Bartragh Td.
Draft Plan zoning	Open space (OS)
Proposed amendment	Change the zoning of 0.26 ha from OS to nRES to accommodate two residential units
OPR recommendation on material alteration	MA Recommendation 2 requests the Planning Authority to make the Plan without this amendment.
Chief Executive's response in the Third CE Report	The subject lands are neither fully serviced (Tier 1), nor serviceable during the six-year period of the CDP 2014–2030 (Tier 2).

PAZ-31 (Enniscrone)	
	<p>The proposed amendment would be inconsistent with the sequential approach to zoning, having regard to its peripheral location which leapfrogs a substantial extent of lands in the green belt.</p> <p>As advised in the Second Chief Executive's Report, the CE does not support this Proposed Amendment.</p>
Adopted zoning	New residential uses (nRES)

10.2 Draft Direction Item 2(b)(vii)

b. Delete the following material alterations from the adopted County Development Plan such that the subject lands revert to as indicated in the draft County Development Plan:

(vii) PAZ 31, i.e. the subject lands revert to Open Space (OS) from New Residential (nRES).

10.3 Submissions relating to Item 2(b)(vii)

Only two submissions have been received in relation to this item: the NWRA supports the Draft Direction, while the landowner argues in favour of retaining the residential zoning of the lands, thereby opposing the Draft Direction.

Uisce Éireann's submission provides additional details on water service infrastructure.

10.3.1 Submission supporting the Draft Direction

Submission 15 – Northern and Western Regional Assembly (extract)

<https://consult.sligococo.ie/en/submission/slg-c57-15>

The NWRA indicates that, in its submission dated 05 July 2024, the Regional Assembly did not address zoning amendments for lands located outside the Regional Growth Centre, i.e. Sligo Town.

Therefore, the submission does not contain specific comments on Items 2 a(i) and 2 b(vii)-(xx) (i.e. **PAZ-31**, PAZ-32, PAZ-33, PAZ-34, PAZ-41, PAZ-42, PAZ-44, PAZ-45, PAZ-57, PAZ-61, PAZ-63, PAZ-76, PAZ-79, PAZ-80) of the Draft Ministerial Direction.

However, the Assembly indicates its support for the concept of compact growth, as outlined in the Regional Spatial and Economic Strategy and in particular Regional Policy Objectives RPO 3.1, RPO 3.2(b), RPO 3.2 (c), RPO 3.3, RPO 3.4 and RPO 3.7.39.

Considering the cumulative impact of the zonings referred to in Items 2(a)(i) and 2(b)(i)-(xx), the Assembly fully supports the Draft Ministerial Direction.

10.3.2 Submission opposing the Draft Direction

Submission 111 – Fergal Cawley

<https://consult.sligococo.ie/en/submission/slg-c57-111>

The submission supports the residential zoning of the lands subject to PAZ-31 in Enniscrone, indicating that there is a sewer in the area, serving the Diamond Coast Hotel and 50 houses across the road from the site.

For a more detailed summary of this submission, please refer to Appendix 2 of this Report.

10.3.3 Submission 73 – Uisce Éireann (extract)

<https://consult.sligococo.ie/en/submission/slg-c57-73>

In addition to previous commentary (provided at Proposed Amendments stage), UÉ advises the following in relation to PAZ-31:

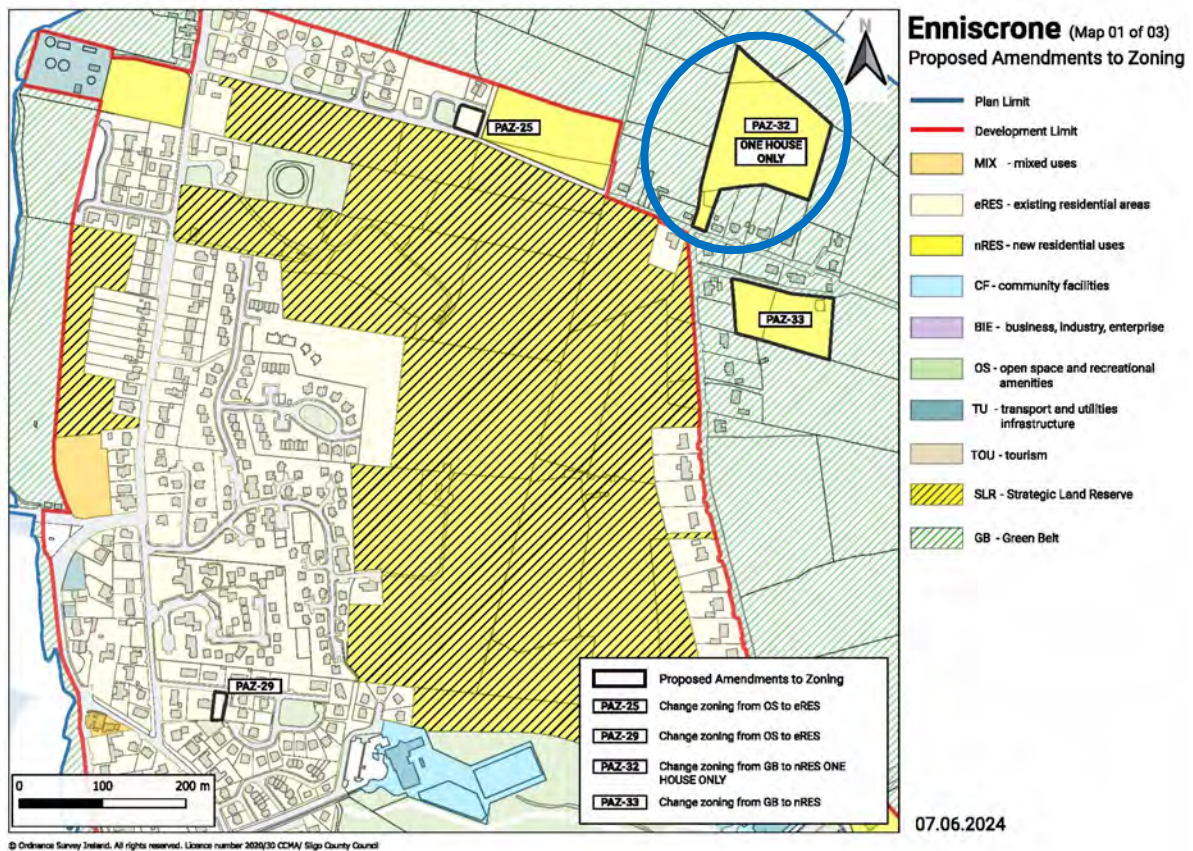
- *To the south of the town, available information indicates the UÉ sewer network extends only as far as the 'Linx' estate.*

[Note – The correct name is “the Links Estate”, not the “Linx estate”]

10.4 Chief Executive’s recommendation on Item 2(b)(vii)

Consistent with the Chief Executive’s recommendation contained in the Third Chief Executive’s Report in respect of PAZ-31, the subject lands should revert to Open Space zoning.

11. Draft Direction on PAZ-32



11.1 Background information

PAZ-32 (Enniscrone)	
Site area and location	1.81 ha at Carrowhubbuck South Td.
Draft Plan zoning	Green Belt (GB)
Proposed amendment	Change the zoning of 1.81 ha from GB to nRES to accommodate one house for the landowner
OPR recommendation on material alteration	MA Recommendation 2 requests the Planning Authority to make the Plan without this amendment.
Chief Executive's response in the Third CE Report	<p>The subject lands are neither fully serviced (Tier 1), nor serviceable during the six-year period of the CDP 2014–2030 (Tier 2).</p> <p>The lands are located outside the CSO (2016) Settlement Boundary, in a peripheral location which leapfrogs lands in the SLR and the Green Belt.</p>

PAZ-32 (Enniscrone)	
	<p>The proposed amendment would therefore be inconsistent with the sequential approach to zoning.</p> <p>As advised in the Second Chief Executive's Report, the CE does not support this Proposed Amendment.</p>
Adopted zoning	New residential uses (nRES)

11.2 Draft Direction Item 2(b)(viii)

b. Delete the following material alterations from the adopted County Development Plan such that the subject lands revert to as indicated in the draft County Development Plan:

(viii) PAZ 32, i.e. the subject lands revert to Green Belt (GB) from New Residential (nRES)

11.3 Submissions relating to Item 2(b)(viii)

Only one submission has been received in relation to this item, from the NWRA, which supports the Draft Direction.

Submission 15 – Northern and Western Regional Assembly (extract)

<https://consult.sligococo.ie/en/submission/slg-c57-15>

The NWRA indicates that, in its submission dated 05 July 2024, the Regional Assembly did not address zoning amendments for lands located outside the Regional Growth Centre, i.e. Sligo Town.

Therefore, the submission does not contain specific comments on Items 2 a(i) and 2 b(vii)-(xx) (i.e. PAZ-31, **PAZ-32**, PAZ-33, PAZ-34, PAZ-41, PAZ-42, PAZ-44, PAZ-45, PAZ-57, PAZ-61, PAZ-63, PAZ-76, PAZ-79, PAZ-80) of the Draft Ministerial Direction.

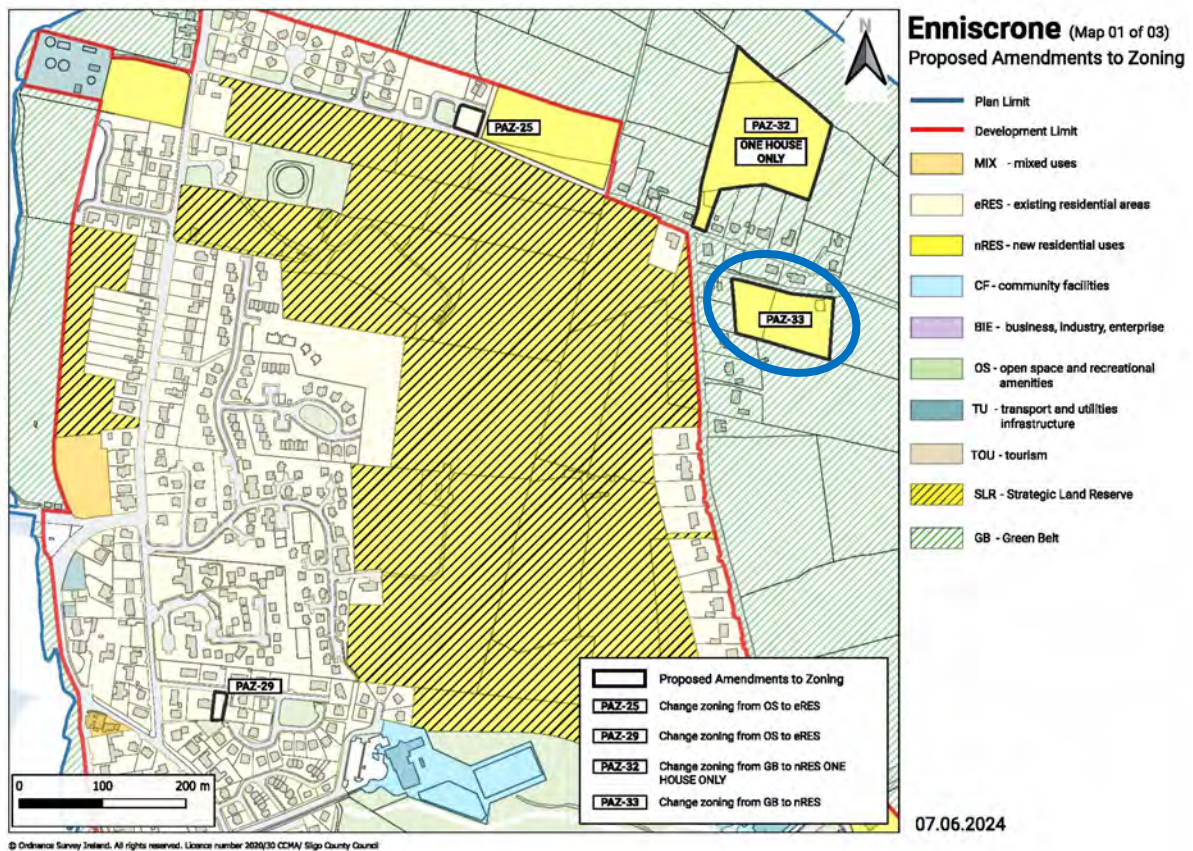
However, the Assembly indicates its support for the concept of compact growth, as outlined in the Regional Spatial and Economic Strategy and in particular Regional Policy Objectives RPO 3.1, RPO 3.2(b), RPO 3.2 (c), RPO 3.3, RPO 3.4 and RPO 3.7.39.

Considering the cumulative impact of the zonings referred to in Items 2(a)(i) and 2(b)(i)-(xx), the Assembly fully supports the Draft Ministerial Direction.

11.4 Chief Executive's recommendation on Item 2(b)(viii)

Consistent with the Chief Executive's recommendation contained in the Third Chief Executive's Report in respect of PAZ-32, the subject lands should revert to Green Belt zoning.

12. Draft Direction on PAZ-33



12.1 Background information

PAZ-33 (Enniscrone)	
Site area and location	0.79 ha at Carrowhubbuck South Td.
Draft Plan zoning	Green Belt (GB)
Proposed amendment	Change the zoning of 0.79 ha from GB to nRES
OPR recommendation on material alteration	MA Recommendation 2 requests the Planning Authority to make the Plan without this amendment.
Chief Executive's response in the Third CE Report	<p>The subject lands are neither fully serviced (Tier 1), nor serviceable during the six-year period of the CDP 2024–2030 (Tier 2).</p> <p>The lands are located outside the CSO (2016) Settlement Boundary, in a peripheral location which leapfrogs lands in the SLR and the Green Belt.</p>

PAZ-33 (Enniscrone)	
	<p>The proposed amendment would therefore be inconsistent with the sequential approach to zoning.</p> <p>As advised in the Second Chief Executive's Report, the CE does not support this Proposed Amendment.</p>
Adopted zoning	New residential uses (nRES)

12.2 Draft Direction Item 2(b)(ix)

b. Delete the following material alterations from the adopted County Development Plan such that the subject lands revert to as indicated in the draft County Development Plan:

(ix) PAZ 33, i.e. the subject lands revert to Green Belt from New Residential (nRES).

12.3 Submissions relating to Item 2(b)(ix)

Only two submissions have been received in relation to this item: the NWRA supports the Draft Direction, while the landowner argues in favour of retaining the residential zoning of the lands, thereby opposing the Draft Direction.

12.3.1 Submission supporting the Draft Direction

Submission 15 – Northern and Western Regional Assembly (extract)

<https://consult.sligococo.ie/en/submission/slg-c57-15>

The NWRA indicates that, in its submission dated 05 July 2024, the Regional Assembly did not address zoning amendments for lands located outside the Regional Growth Centre, i.e. Sligo Town.

Therefore, the submission does not contain specific comments on Items 2 a(i) and 2 b(vii)-(xx) (i.e. PAZ-31, PAZ-32, **PAZ-33**, PAZ-34, PAZ-41, PAZ-42, PAZ-44, PAZ-45, PAZ-57, PAZ-61, PAZ-63, PAZ-76, PAZ-79, PAZ-80) of the Draft Ministerial Direction.

However, the Assembly indicates its support for the concept of compact growth, as outlined in the Regional Spatial and Economic Strategy and in particular Regional Policy Objectives RPO 3.1, RPO 3.2(b), RPO 3.2 (c), RPO 3.3, RPO 3.4 and RPO 3.7.39.

Considering the cumulative impact of the zonings referred to in Items 2(a)(i) and 2(b)(i)-(xx), the Assembly fully supports the Draft Ministerial Direction.

12.3.2 Submission opposing the Draft Direction

Submission 108 – Bernard Fox

<https://consult.sligococo.ie/en/submission/slg-c57-108>

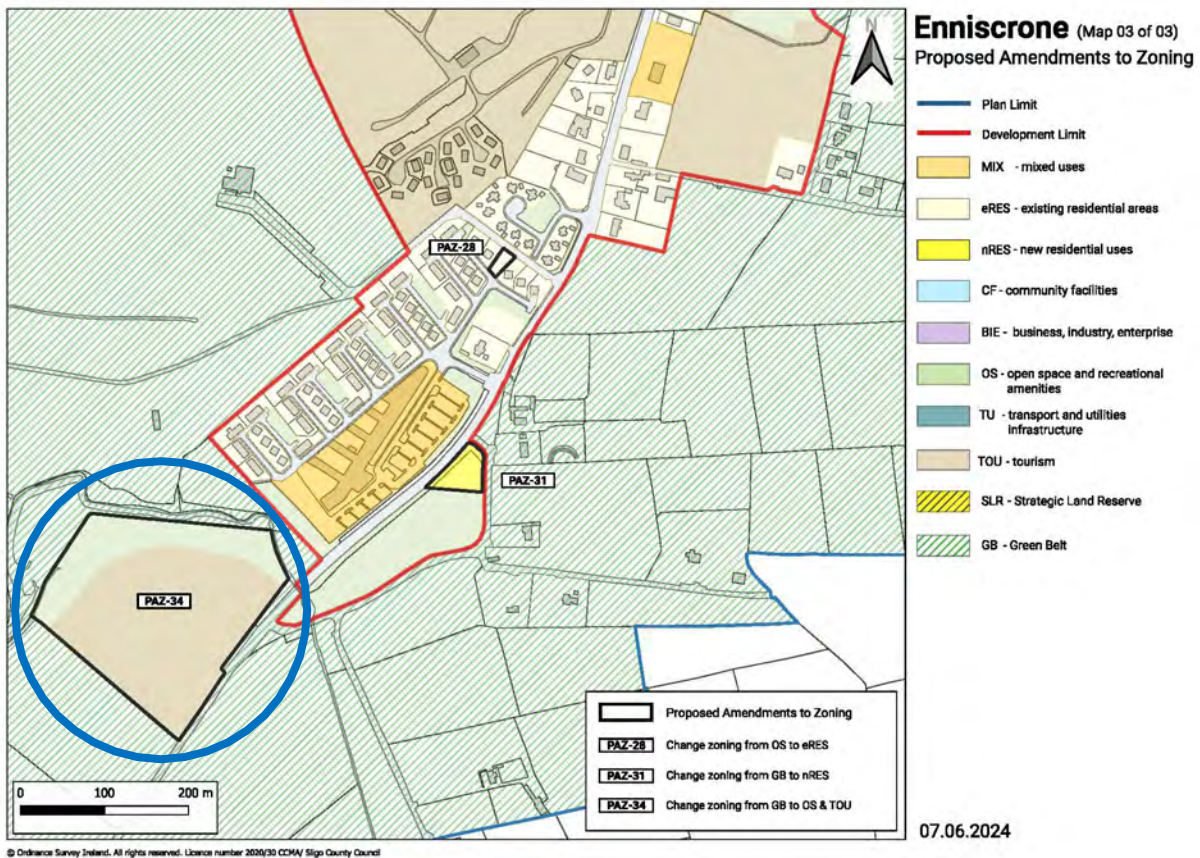
The submission supports the residential zoning of the lands subject to PAZ-33 in Enniscrone, indicating that this is a brownfield site and that the developer (Pentico Ltd) is prepared to extend the sewer, which could also be used to service 30 single houses currently connected to individual septic tanks.

For a more detailed summary of this submission, refer to Appendix 2 of this Report.

12.4 Chief Executive's recommendation on Item 2(b)(ix)

Consistent with the Chief Executive's recommendation contained in the Third Chief Executive's Report in respect of PAZ-33, the subject lands should revert to Green Belt zoning.

13. Draft Direction on PAZ-34



13.1 Background information

PAZ-34 (Enniscrone)	
Site area and location	4.96 ha at Scurmore Td.
Draft Plan zoning	Green Belt (GB)
Proposed amendment	Change the zoning of land to the south of Enniscrone Town from Green Belt (GB) to 3.62 ha TOU and 1.34 ha OS.
OPR recommendation on material alteration	MA Recommendation 5 and MA Recommendation 8 request the Planning Authority to make the Plan without this amendment.
Chief Executive's response in the Third CE Report	The OPR and OPW submissions identify the lands as an area at risk of flooding. The PAZ proposes that the northern section of lands, which are located in Flood Zones A & B, be zoned as open space (OS), which is a water-compatible development and is in accordance with the sequential approach outlined in the Flood Risk Management Guidelines.

PAZ-34 (Enniscrone)	
	<p>Notwithstanding the above and as advised in the Second CE Report, the CE does not support the making of this amendment.</p> <p>That position has now been reinforced by the submissions received from the OPR and UÉ which details that the subject lands are neither fully serviced (Tier 1), nor serviceable during the six-year period of the CDP 2014 – 2030 (Tier 2). The lands are located outside the CSO Settlement Boundary, would not support the achievement of compact growth and do not represent a sequential approach to zoning.</p>
Adopted zoning	3.62 ha Tourism uses (TOU) and 1.34 ha Open Space (OS)

13.2 Draft Direction Item 2(b)(xviii)

b. Delete the following material alterations from the adopted County Development Plan such that the subject lands revert to as indicated in the draft County Development Plan:

(xviii) PAZ 34, i.e. the subject lands revert to Green Belt (GB) from Tourism (TOU) and Open Space (OS)

13.3 Submissions relating to Item 2(b)(xviii)

Only two submissions have been received in relation to this item: the NWRA supports the Draft Direction, while the landowners argue in favour of retaining the adopting zoning of the lands, thereby opposing the Draft Direction.

Uisce Éireann's submission provides additional details on water service infrastructure.

13.3.1 Submission supporting the Draft Direction

Submission 15 – Northern and Western Regional Assembly (extract)

<https://consult.sligococo.ie/en/submission/slg-c57-15>

The NWRA indicates that, in its submission dated 05 July 2024, the Regional Assembly did not address zoning amendments for lands located outside the Regional Growth Centre, i.e. Sligo Town.

Therefore, the submission does not contain specific comments on Items 2 a(i) and 2 b(vii)-(xx) (i.e. PAZ-31, PAZ-32, PAZ-33, **PAZ-34**, PAZ-41, PAZ-42, PAZ-44, PAZ-45, PAZ-57, PAZ-61, PAZ-63, PAZ-76, PAZ-79, PAZ-80) of the Draft Ministerial Direction.

However, the Assembly indicates its support for the concept of compact growth, as outlined in the Regional Spatial and Economic Strategy and in particular Regional Policy Objectives RPO 3.1, RPO 3.2(b), RPO 3.2 (c), RPO 3.3, RPO 3.4 and RPO 3.7.39.

Considering the cumulative impact of the zonings referred to in Items 2(a)(i) and 2(b)(i)-(xx), the Assembly fully supports the Draft Ministerial Direction.

13.3.2 Submission opposing the Draft Direction

Submission 107 – Brendan and Aidan Gregory Feeney

<https://consult.sligococo.ie/en/submission/slg-c57-107>

The submission supports the zoning of the lands subject to PAZ-34 in Enniscrone, stating that the proposal reflects the objectives for sustainable tourism development outlined in the Sligo CDP 2024-2030 and complements plans for other tourism projects funded by the Department for Rural and Community Development.

The submission states that *“this proposal has twice been approved by elected councillors”* and urges the Council to *“reconsider the rezoning decision and recognize the project’s potential to position Enniscrone as a leader in sustainable tourism”*.

For a more detailed summary of this submission, please refer to Appendix 2 of this Report.

13.3.3 Submission 73 – Uisce Éireann (extract)

<https://consult.sligococo.ie/en/submission/slg-c57-73>

In addition to previous commentary (provided at Proposed Amendments stage), UÉ advises the following in relation to PAZ-34:

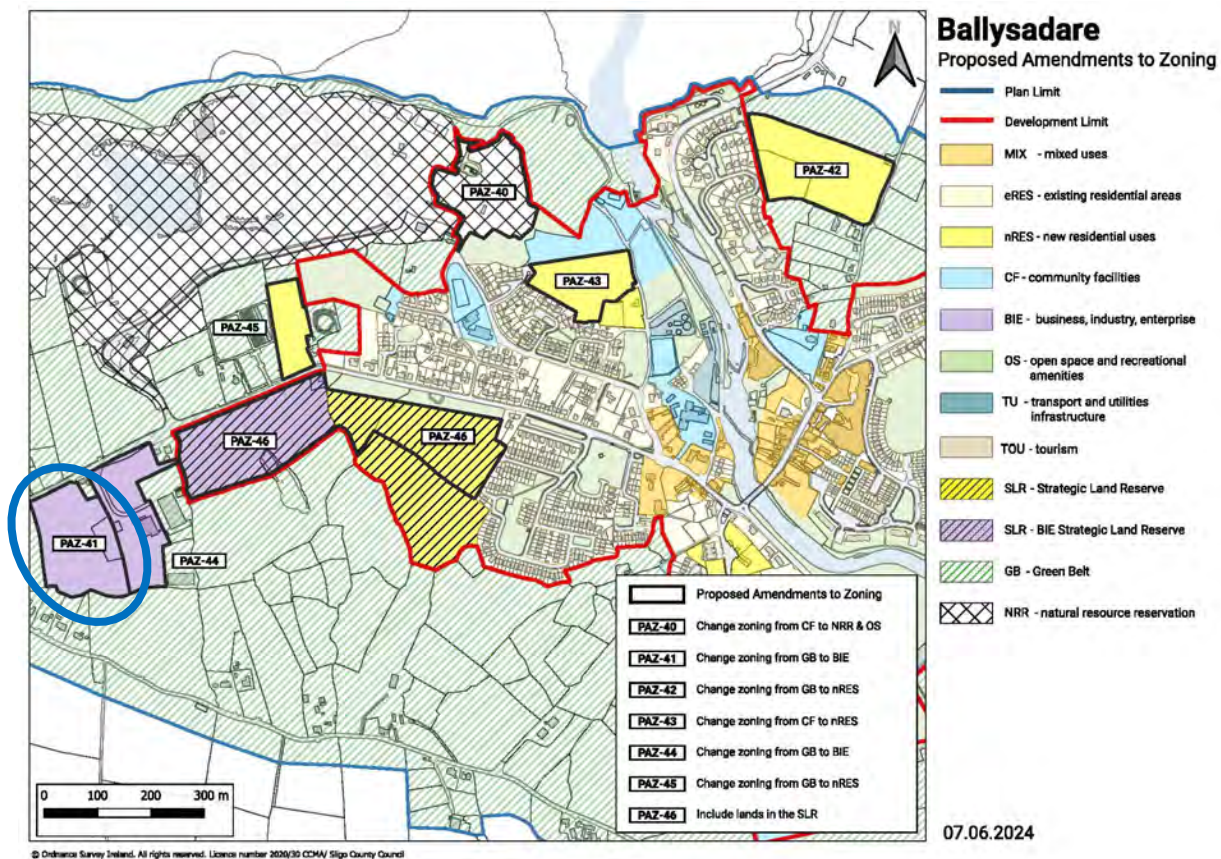
- *To the south of the town, available information indicates the UÉ sewer network extends only as far as the ‘Linx’ estate.*

[Note: the correct name is “Links Estate”, not “Linx estate”]

13.4 Chief Executive’s recommendation on Item 2(b)(xviii)

Consistent with the Chief Executive’s recommendation contained in the Third Chief Executive’s Report in respect of PAZ-34, the subject lands should revert to Green Belt zoning.

14. Draft Direction on PAZ-41



14.1 Background information

PAZ-41 (Ballysadare)	
Site area and location	2.77 ha at Abbeytown Td.
Draft Plan zoning	Green Belt (GB)
Proposed amendment	Change the zoning of 2.77 ha from GB to BIE.
OPR recommendation on material alteration	MA Recommendation 5 requests the Planning Authority to make the Plan without this amendment.
Chief Executive's response in the Third CE Report	The lands are located off the N59 where, by reason of the applicable speed limit, the creation of a new entrance or intensification of an existing entrance would be in direct conflict with the provisions of national policy. The subject lands are neither fully serviced (Tier 1), nor serviceable during the six-year period of the CDP 2024-2030 (Tier 2). In accordance with the National Policy Objective 72c (NPF), land that cannot be serviced within the life of the plan should not be zoned for development.

PAZ-41 (Ballysadare)	
	<p>It is considered that the zoning of the lands subject to PAZ-41 would undermine the potential of the Satellite Village to grow in a compact manner and to provide suitably located employment land within the village as specified in the Core Strategy of the Draft Plan.</p> <p>As advised in the Second Chief Executive's Report, the CE does not support the making of this Proposed Amendment.</p>
Adopted zoning	Business, industry, enterprise (BIE)

14.2 Draft Direction Item 2(b)(xix)

b. Delete the following material alterations from the adopted County Development Plan such that the subject lands revert to as indicated in the draft County Development Plan:

(xix) PAZ 41, i.e. the subject lands revert to Green Belt (GB) from Business/Industry/ Enterprise (BIE)

14.3 Submissions relating to Item 2(b)(xix)

Two submissions have been received in support of the Draft Direction (one from the NWRA), while three submissions argue against it (including one from the landowners).

14.3.1 Submissions supporting the Draft Direction

Submission 15 – Northern and Western Regional Assembly (extract)

<https://consult.sligococo.ie/en/submission/slg-c57-15>

The NWRA indicates that, in its submission dated 05 July 2024, the Regional Assembly did not address zoning amendments for lands located outside the Regional Growth Centre, i.e. Sligo Town.

Therefore, the submission does not contain specific comments on Items 2 a(i) and 2 b(vii)-(xx) (i.e. PAZ-31, PAZ-32, PAZ-33, PAZ-34, **PAZ-41**, PAZ-42, PAZ-44, PAZ-45, PAZ-57, PAZ-61, PAZ-63, PAZ-76, PAZ-79, PAZ-80) of the Draft Ministerial Direction.

However, the Assembly indicates its support for the concept of compact growth, as outlined in the Regional Spatial and Economic Strategy and in particular Regional Policy Objectives RPO 3.1, RPO 3.2(b), RPO 3.2 (c), RPO 3.3, RPO 3.4 and RPO 3.7.39.

Considering the cumulative impact of the zonings referred to in Items 2(a)(i) and 2(b)(i)-(xx), the Assembly fully supports the Draft Ministerial Direction.

Submission 18 – Transport Infrastructure Ireland (TII) (extract)

<https://consult.sligococo.ie/en/submission/slg-c57-18>

The TII reminds the Council that its observations on the Proposed Amendments (Submission 39 of 2 July 2024) identified the potential for policy conflict arising from the zoning of additional lands – subject to **PAZ-41**, PAZ-44 and PAZ-46 – to the west of Ballysadare at a location alongside the national N-59, where an 80 km/h speed limit applies.

While the (Third) Chief Executive’s Report confirmed that the site subject to PAZ-46 can be accessed within the 60 km/h speed limit, this was not applicable to the sites subject to **PAZ-41** and PAZ-44.

The TII notes that “Proposed Amendment no. **PAZ-41** and Proposed Amendment no. PAZ-44 were both adopted and included in the final Development Plan but are **not** subject to the Draft Ministerial Direction”.

*[Note 1: presumably the word “not” in the above paragraph is a typographic error in the TII’s submission, as both sites **are** subject to the Draft Ministerial Direction.]*

The submission indicates that the TII’s position in relation to **PAZ-41** (and PAZ-44) “remains as set out in the Authority’s observations submitted on the Proposed Material Alterations to the Draft Sligo County Development Plan, 2024–2030, of 2 July 2024.”

[Note 2: TII’s submission of 2 July 2024 recommended, in relation to PAZ-41, that “access to lands which adjoin or extend along the national road network outside locations subject to a reduced 50–60kph urban speed limit will be omitted from the Plan”. A continuation of this position equates to supporting Item 2(b)(xix) of the Draft Ministerial Direction.]

14.3.2 Submissions opposing the Draft Direction

Submission 54 – Carty Contractors

<https://consult.sligococo.ie/en/submission/slg-c57-54>

The submission supports the zoning of the lands subject to PAZ-41 for Business, Industry, Enterprise (BIE), which is considered “essential to support economic growth, job creation, and sustainable development in the area”. It is indicated that the site was zoned for Business and Enterprise in the CDP 2017-2023, which highlights its suitability for such purposes.

For a more detailed summary of this submission, refer to Appendix 2 of this Report.

Submission 57 – Ann Marie Gavin

<https://consult.sligococo.ie/en/submission/slg-c57-57>

The submission supports the Business, Industry, Enterprise (BIE) zoning of the site subject to PAZ-41 in Ballysadare. It is indicated that the existing infrastructure, strategic location, and historical zoning of the site “highlight its suitability for these purposes”, and that “anticipated improvements in road safety will address planning concerns, ensuring the land can be developed to its full potential”.

Submission 58 – Karl Hannon

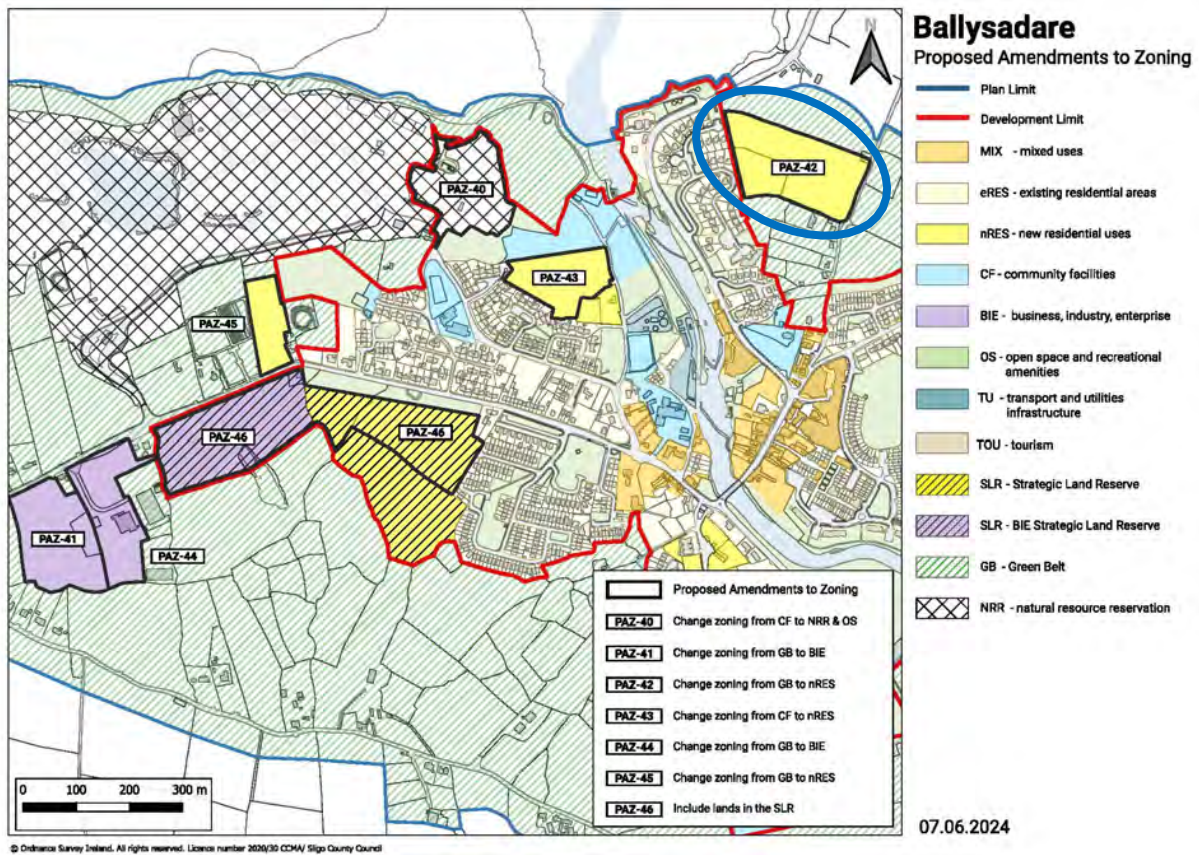
<https://consult.sligococo.ie/en/submission/slg-c57-58>

The submission supports the Business, Industry, Enterprise (BIE) zoning of the site subject to PAZ-41 in Ballysadare. It is indicated that the existing infrastructure, strategic location, and historical zoning of the site *“highlight its suitability for these purposes”*, and that *“anticipated improvements in road safety will address planning concerns, ensuring the land can be developed to its full potential”*.

14.4 Chief Executive’s recommendation on Item 2(b)(xix)

Consistent with the Chief Executive’s recommendation contained in the Third Chief Executive’s Report in respect of PAZ-41, the subject lands should revert to Green Belt zoning.

15. Draft Direction on PAZ-42



15.1 Background information

PAZ-42 (Ballysadare)	
Site area and location	3.36 ha at Knockmuldowney Td.
Draft Plan zoning	Green Belt (GB)
Proposed amendment	Change the zoning of 3.36 ha from GB to nRES.
OPR recommendation on material alteration	MA Recommendation 3 requests the Planning Authority to make the Plan without this amendment.
Chief Executive's response in the Third CE Report	The Traffic and Transportation Assessment carried out in support of PAZ-42 is acknowledged. The assessment demonstrates that the existing junction serving the Knockmuldowney Park estate can cater for the additional traffic that may be generated by the development of these lands. However, the submission [<i>i.e. Submission 82</i>] does not address whether it is possible to access the subject lands through the existing estate, having regard to the significant difference in levels between the two sites.

PAZ-42 (Ballysadare)	
	<p>The only alternative vehicular access is therefore off the L-36041, which is not suitable to serve a multi-unit residential development, having regard to its substandard width and alignment.</p> <p>The subject lands are therefore considered neither fully serviced (Tier 1), nor serviceable during the six-year period of the CDP 2024-2030 (Tier 2).</p> <p>Having regard to the above and as advised in the Second Chief Executive's Report, the CE does not support PAZ-42.</p>
Adopted zoning	New residential uses (nRES)

15.2 Draft Direction Item 2(b)(x)

- b. Delete the following material alterations from the adopted County Development Plan such that the subject lands revert to as indicated in the draft County Development Plan:
- (x) PAZ 42, i.e. the subject lands revert to Green Belt from New Residential (nRES).

15.3 Submissions relating to Item 2(b)(x)

Only one submission has been received in relation to this item, from the NWRA, which supports the Draft Direction.

Submission 15 – Northern and Western Regional Assembly (extract)

<https://consult.sligococo.ie/en/submission/slg-c57-15>

The NWRA indicates that, in its submission dated 05 July 2024, the Regional Assembly did not address zoning amendments for lands located outside the Regional Growth Centre, i.e. Sligo Town.

Therefore, the submission does not contain specific comments on Items 2 a(i) and 2 b(vii)-(xx) (i.e. PAZ-31, PAZ-32, PAZ-33, PAZ-34, PAZ-41, **PAZ-42**, PAZ-44, PAZ-45, PAZ-57, PAZ-61, PAZ-63, PAZ-76, PAZ-79, PAZ-80) of the Draft Ministerial Direction.

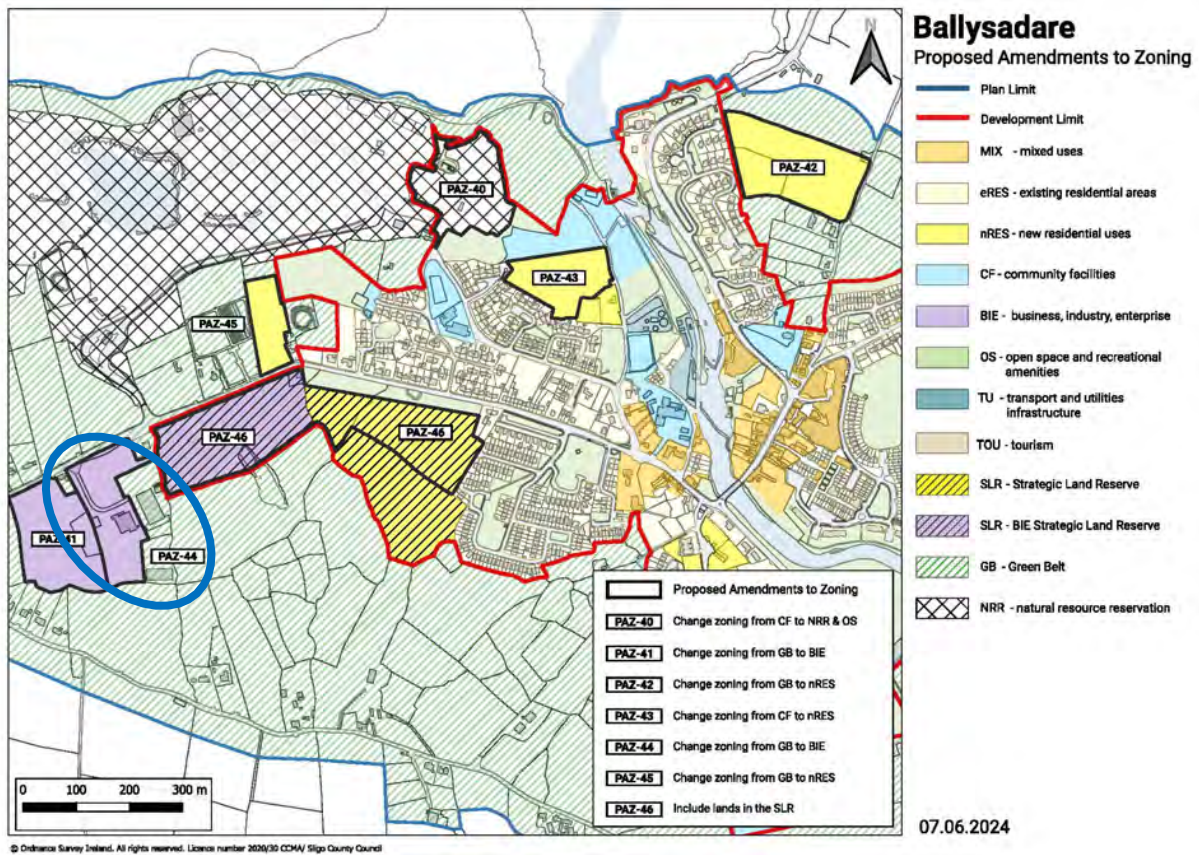
However, the Assembly indicates its support for the concept of compact growth, as outlined in the Regional Spatial and Economic Strategy and in particular Regional Policy Objectives RPO 3.1, RPO 3.2(b), RPO 3.2 (c), RPO 3.3, RPO 3.4 and RPO 3.7.39.

Considering the cumulative impact of the zonings referred to in Items 2(a)(i) and 2(b)(i)-(xx), the Assembly fully supports the Draft Ministerial Direction.

15.4 Chief Executive's recommendation on Item 2(b)(x)

Consistent with the Chief Executive's recommendation contained in the Third Chief Executive's Report in respect of PAZ-42, the subject lands should revert to Green Belt zoning.

16. Draft Direction on PAZ-44



16.1 Background information

PAZ-44 (Ballysadare)	
Site area and location	2.29 ha at Abbeytown Td.
Draft Plan zoning	Green Belt (GB)
Proposed amendment	Change the zoning of 3.36 ha from GB to BIE.
OPR recommendation on material alteration	MA Recommendation 5 requests the Planning Authority to make the Plan without this amendment.
Chief Executive's response in the Third CE Report	<p>The existing use of a portion of the lands for light industrial / warehousing purposes is acknowledged. However, it is noted that the development on site is served by an on-site wastewater treatment system and is not served by the public sewer.</p> <p>The subject lands are neither fully serviced (Tier 1), nor serviceable during the six-year period of the CDP 2024–2030 (Tier 2).</p>

PAZ-44 (Ballysadare)	
	<p>The site of PAZ-44 is located outside the CSO (2016) Settlement Boundary, in a peripheral location. The proposed rezoning would not follow the sequential approach to zoning and would not support the achievement of compact growth.</p> <p>The lands are located off the N-59 at a location where the 80 km/h speed limit applies. The creation of a new entrance or intensification of an existing entrance would be in direct conflict with the provisions of national policy in relation to the control of frontage development on national roads.</p> <p>Having regard to the above and as advised in the Second CE Report, the CE does not support the making of this amendment.</p>
Adopted zoning	Business, industry, enterprise (BIE)

16.2 Draft Direction Item 2(b)(xx)

b. Delete the following material alterations from the adopted County Development Plan such that the subject lands revert to as indicated in the draft County Development Plan:

(xx) PAZ 44, i.e. the subject lands revert to Green Belt (GB) from Business/Industry/ Enterprise (BIE).

16.3 Submissions relating to Item 2(b)(xx)

Two submissions have been received in support of the Draft Direction (from the NWRA and the TII), while one submission (prepared by a consultant on behalf of the landowners) argues in favour of retaining the adopted zoning of the lands, thereby opposing the Draft Direction.

16.3.1 Submissions supporting the Draft Direction

Submission 15 – Northern and Western Regional Assembly (extract)

<https://consult.sligococo.ie/en/submission/slg-c57-15>

The NWRA indicates that, in its submission dated 05 July 2024, the Regional Assembly did not address zoning amendments for lands located outside the Regional Growth Centre, i.e. Sligo Town.

Therefore, the submission does not contain specific comments on Items 2 a(i) and 2 b(vii)-(xx) (i.e. PAZ-31, PAZ-32, PAZ-33, PAZ-34, PAZ-41, PAZ-42, **PAZ-44**, PAZ-45, PAZ-57, PAZ-61, PAZ-63, PAZ-76, PAZ-79, PAZ-80) of the Draft Ministerial Direction.

However, the Assembly indicates its support for the concept of compact growth, as outlined in the Regional Spatial and Economic Strategy and in particular Regional Policy Objectives RPO 3.1, RPO 3.2(b), RPO 3.2 (c), RPO 3.3, RPO 3.4 and RPO 3.7.39. Considering the cumulative impact of the zonings referred to in Items 2(a)(i) and 2(b)(i)-(xx), the Assembly fully supports the Draft Ministerial Direction.

Submission 18 – Transport Infrastructure Ireland (TII) (extract)

<https://consult.sligococo.ie/en/submission/slg-c57-18>

The TII reminds the Council that its observations on the Proposed Amendments (Submission 39 of 2 July 2024) identified the potential for policy conflict arising from the zoning of additional lands – subject to **PAZ-41**, PAZ-44 and PAZ-46 – to the west of Ballysadare at a location alongside the national N-59, where an 80 km/h speed limit applies.

While the (Third) Chief Executive's Report confirmed that the site subject to PAZ-46 can be accessed within the 60 km/h speed limit, this was not applicable to the sites subject to **PAZ-41** and PAZ-44.

The TII notes that *"Proposed Amendment no. **PAZ-41** and Proposed Amendment no. PAZ-44 were both adopted and included in the final Development Plan but are not subject to the Draft Ministerial Direction"*.

[Note 1: presumably the word "not" in the above paragraph is a typographic error in the TII's submission, as both sites are subject to the Draft Ministerial Direction.]

The submission indicates that the TII's position in relation to **PAZ-41** (and PAZ-44) *"remains as set out in the Authority's observations submitted on the Proposed Material Alterations to the Draft Sligo County Development Plan, 2024–2030, of 2 July 2024."*

[Note 2: TII's submission of 2 July 2024 recommended, in relation to PAZ-41, that "access to lands which adjoin or extend along the national road network outside locations subject to a reduced 50–60kph urban speed limit will be omitted from the Plan". A continuation of this position equates to supporting Item 2(b)(xix) of the Draft Ministerial Direction.]

16.3.2 Submission opposing the Draft Direction

Submission 67 – Cathal O'Connor, David McMunn

<https://consult.sligococo.ie/en/submission/slg-c57-67>

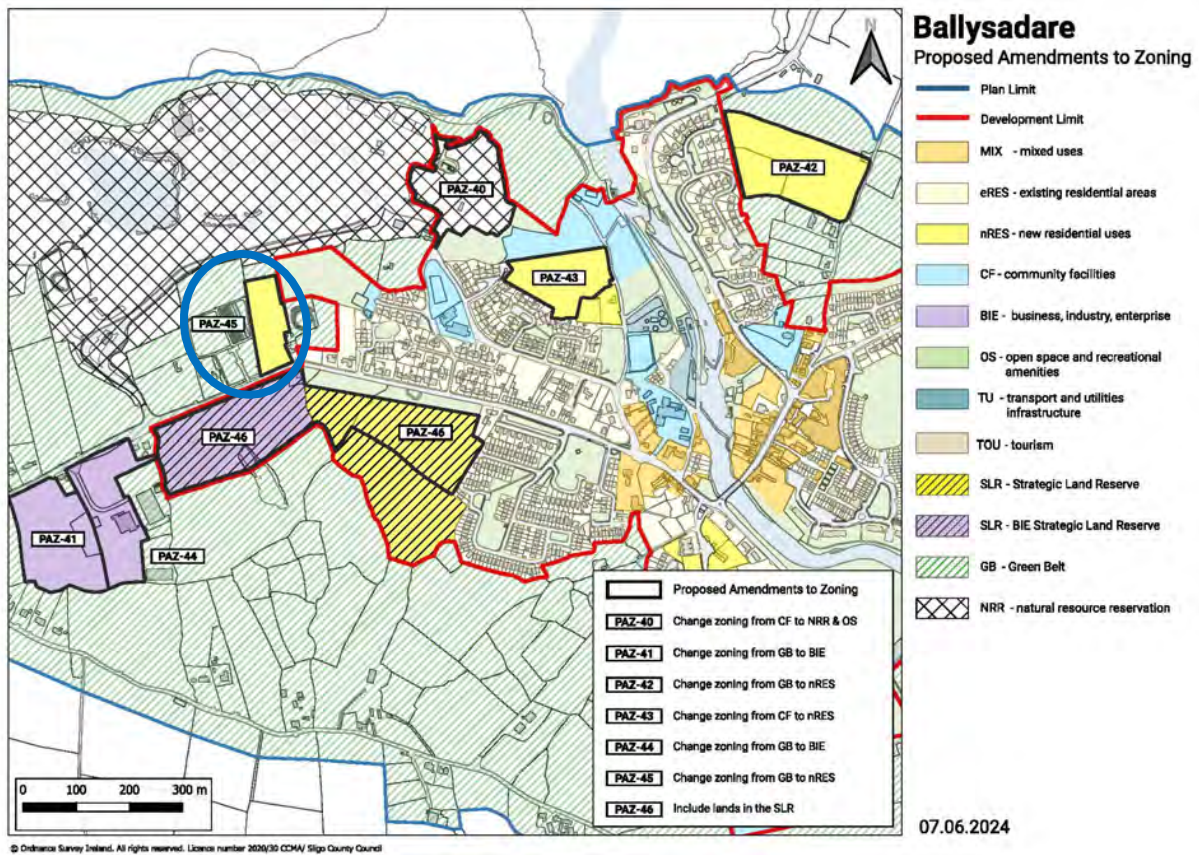
This submission, prepared by consultant Robert Keran on behalf of Cathal O'Connor and David McMunn, is one of six with similar contents. The submission supports the retention of Business, Industry, Enterprise (BIE) zoning for the lands subject to PAZ-44, stating that *"it is entirely appropriate that the subject site, with an existing, established and ongoing commercial use, be zoned BIE to reflect the existing use"*.

For a more detailed summary of this submission, please refer to Appendix 2 of this Report.

16.4 Chief Executive's recommendation on Item 2(b)(xx)

Consistent with the Chief Executive's recommendation contained in the Third Chief Executive's Report in respect of PAZ-44, the subject lands should revert to Green Belt zoning.

17. Draft Direction on PAZ-45



17.1 Background information

PAZ-45 (Ballysadare)	
Site area and location	1.11 ha at Abbeytown Td.
Draft Plan zoning	Green Belt (GB)
Proposed amendment	Change the zoning of 1.11 ha from GB to nRES
OPR recommendation on material alteration	MA Recommendation 3 requests the Planning Authority to make the Plan without this amendment.
Chief Executive's response in the Third CE Report	The subject lands are located adjacent to a working quarry (with associated concrete manufacturing facilities) which has been granted permission to extend and continue its operation. It is considered that the zoning of the lands nRES would seriously interfere with the operation of this quarry, which is a major national resource base.

PAZ-45 (Ballysadare)	
	<p>The lands are neither fully serviced (Tier 1), nor serviceable during the six-year period of the CDP 2024–2030 (Tier 2).</p> <p>The site of PAZ-45 is located outside the CSO (2016) Settlement Boundary, in a peripheral location. Its rezoning would not follow the sequential approach. The site is not required to meet the housing allocation for Ballysadare as set out in the Core Strategy.</p> <p>As advised in the Second Chief Executive's Report, the CE does not support this Proposed Amendment.</p>
Adopted zoning	New residential uses (nRES)

17.2 Draft Direction Item 2(b)(xi)

b. Delete the following material alterations from the adopted County Development Plan such that the subject lands revert to as indicated in the draft County Development Plan:

(xi) PAZ 45, i.e. the subject lands revert to Green Belt (GB) from New Residential (nRES)

17.3 Submissions relating to Item 2(b)(xi)

The NWRA submission supports the Draft Direction, while the landowners' submission (prepared by a consultant) argues in favour of retaining the residential zoning of the lands, thereby opposing the Draft Direction.

Uisce Éireann's submission provides additional details on water service infrastructure.

17.3.1 Submission supporting the Draft Direction

Submission 15 – Northern and Western Regional Assembly (extract)

<https://consult.sligococo.ie/en/submission/slg-c57-15>

The NWRA indicates that, in its submission dated 05 July 2024, the Regional Assembly did not address zoning amendments for lands located outside the Regional Growth Centre, i.e. Sligo Town.

Therefore, the submission does not contain specific comments on Items 2 a(i) and 2 b(vii)-(xx) (i.e. PAZ-31, PAZ-32, PAZ-33, PAZ-34, PAZ-41, PAZ-42, PAZ-44, **PAZ-45**, PAZ-57, PAZ-61, PAZ-63, PAZ-76, PAZ-79, PAZ-80) of the Draft Ministerial Direction.

However, the Assembly indicates its support for the concept of compact growth, as outlined in the Regional Spatial and Economic Strategy and in particular Regional Policy Objectives RPO 3.1, RPO 3.2(b), RPO 3.2 (c), RPO 3.3, RPO 3.4 and RPO 3.7.39.

Considering the cumulative impact of the zonings referred to in Items 2(a)(i) and 2(b)(i)-(xx), the Assembly fully supports the Draft Ministerial Direction.

17.3.2 Submission opposing the Draft Direction

Submission 65 – Beldare Homes

<https://consult.sligococo.ie/en/submission/slg-c57-65>

This submission, prepared by consultant Robert Keran on behalf of Beldare Homes, is one of six with similar contents.

In essence, the submission supports the retention of New Residential (nRES) zoning for the lands subject to PAZ-45. The consultant seeks to demonstrate that the site subject to PAZ-45 *“is sequentially preferable, serviced or capable of being serviced, and within or appropriate to be within the settlement boundary, would not adversely affect natural or cultural heritage”*.

For a more detailed summary of this submission, please refer to Appendix 2 of this Report.

17.3.3 Submission 73 – Uisce Éireann (extract)

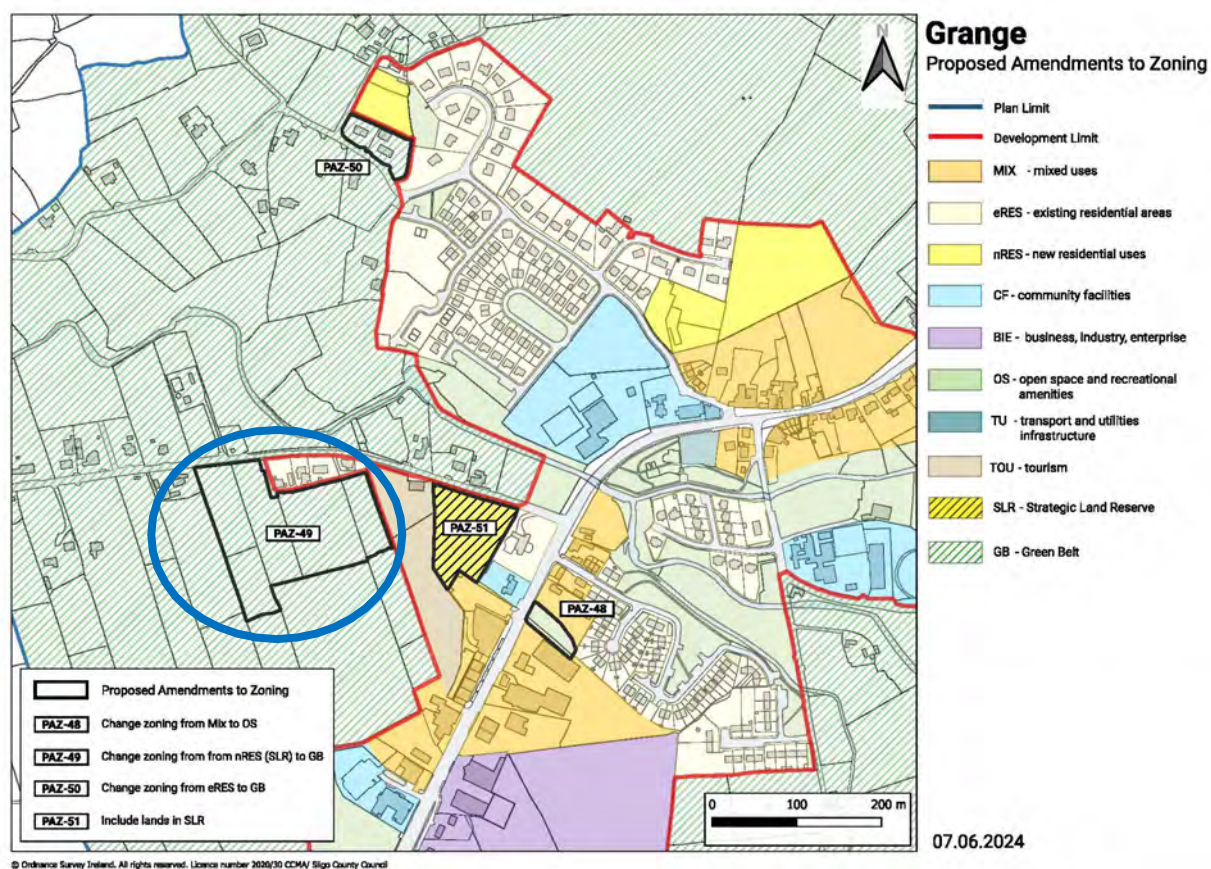
<https://consult.sligococo.ie/en/submission/slg-c57-73>

In addition to previous commentary (provided at Proposed Amendments stage), UÉ advises the following in relation to PAZ-45: *“there is a sewer in the field to the east approximately 40 m from the site, but third-party permissions may be required. To connect to the network via the public road, an extension of at least 160 m would be required”*.

17.4 Chief Executive’s recommendation on Item 2(b)(xi)

Consistent with the Chief Executive’s recommendation contained in the Third Chief Executive’s Report in respect of PAZ-45, the subject lands should revert to Green Belt zoning.

18. Draft Direction on PAZ-49



18.1 Background information

PAZ-49 (Grange)	
Site area and location	2.49 ha at Cloontyprocklis Td.
Draft Plan zoning	Strategic Land Reserve (SLR/nRES)
Proposed amendment	Change the zoning of 2.49 ha from nRES (SLR) to GB (Green Belt).
OPR recommendation on material alteration	<p>None.</p> <p>Extract from the OPR's submission on Proposed Amendments:</p> <p><i>"The Office notes the omission of the Strategic Land Reserve from the western approach to Grange Village, in accordance with Recommendation 2"</i></p>

PAZ-49 (Grange)	
Chief Executive's response in the Third CE Report	<p>This amendment was proposed by the CE for reasons set out in the Second Chief Executive's Report.</p> <p>Extract from the Second Chief Executive's Report:</p> <p>"4.B Zoning of site in Grange</p> <p><i>The site identified as No. 6 in the Infrastructure Assessment for Grange (Appendix A, Section A.9) is indeed not fully serviced. The purpose of designating the site adjoining the local road L-3203 (shown on the Draft Grange Zoning Map) as Strategic Land Reserve was to emphasise that this is the most likely direction where the village could expand in the future.</i></p> <p><i>However, there is no objection to redesignate this site as Green Belt, having regard to the GB zoning objective which is designed to "contain and consolidate settlements, while safeguarding lands for their future expansion and for the provision of strategic infrastructure."</i></p>
Adopted zoning	Strategic Land Reserve (SLR/nRES)

18.2 Draft Direction Item 2(a)(i)

a. Delete the following zoning objectives from the adopted County Development Plan:

- (i) the lands on the L3203 on the western approach to Grange, i.e. the subject land reverts to not zoned from Strategic Land Reserve.

18.3 Submissions relating to Item 2(a)(i)

Only one submission has been received in relation to this item: the NWRA supports the Draft Direction.

Submission 15 – Northern and Western Regional Assembly (extract)

<https://consult.sligococo.ie/en/submission/slg-c57-15>

The NWRA indicates that, in its submission dated 05 July 2024, the Regional Assembly did not address zoning amendments for lands located outside the Regional Growth Centre, i.e. Sligo Town.

Therefore, the submission does not contain specific comments on Items 2(a)(i) (i.e. **PAZ-49**) and 2(b)(vii)-(xx) (i.e. PAZ-31, PAZ-32, PAZ-33, PAZ-34, PAZ-41, PAZ-42, PAZ-44, PAZ-45, PAZ-57, PAZ-61, PAZ-63, PAZ-76, PAZ-79, PAZ-80) of the Draft Ministerial Direction.

However, the Assembly indicates its support for the concept of compact growth, as outlined in the Regional Spatial and Economic Strategy and in particular Regional Policy Objectives RPO 3.1, RPO 3.2(b), RPO 3.2 (c), RPO 3.3, RPO 3.4 and RPO 3.7.39.

Considering the cumulative impact of the zonings referred to in Items 2(a)(i) and 2(b)(i)-(xx), the Assembly fully supports the Draft Ministerial Direction.

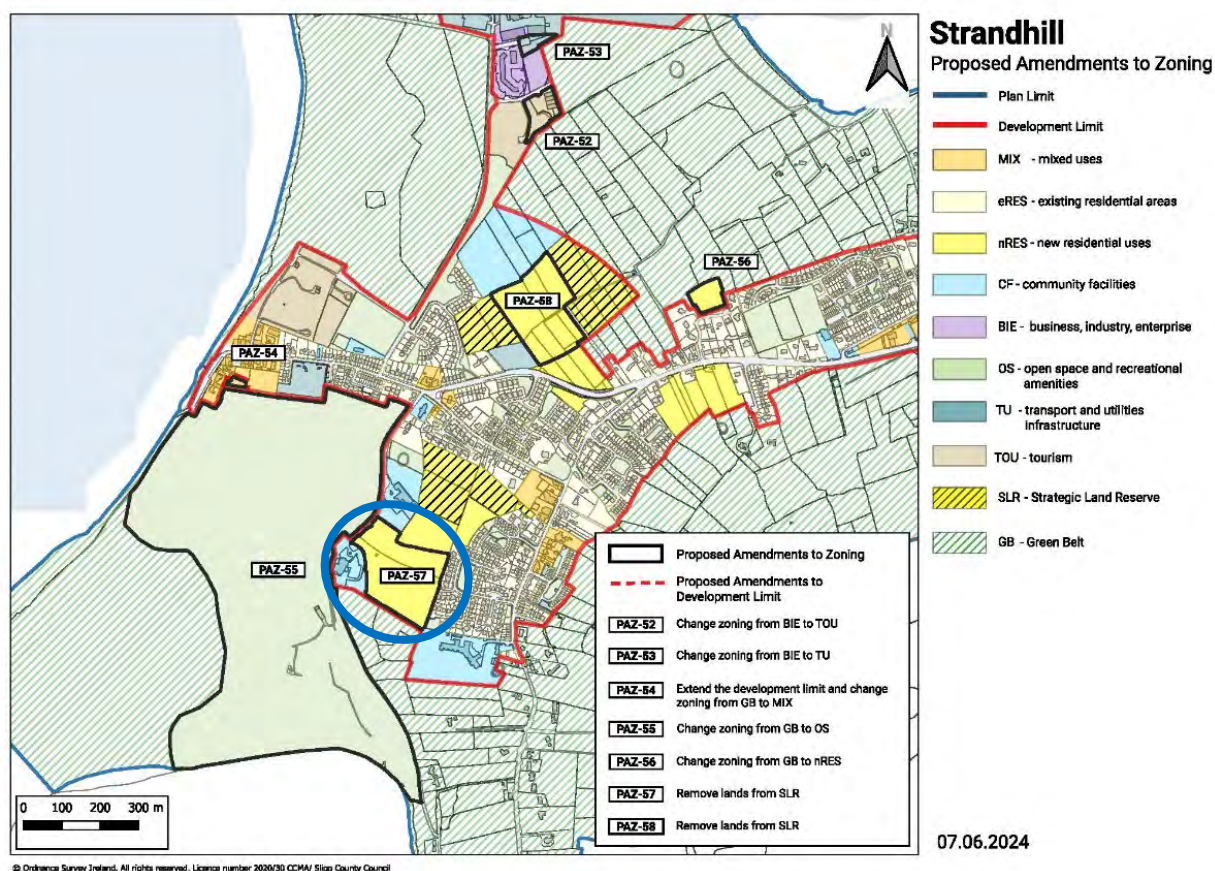
18.4 Chief Executive's recommendation on Item 2(a)(i)

The change requested by the Draft Direction – that “*the subject land reverts to NOT ZONED*” (emphasis added) – would result in the lands becoming an unzoned island, surrounded by the wider area zoned Green Belt .

Given that all the lands located within the Plan Limit have been assigned a land use zoning, and that the lands located between the Plan Limit and the Development Limit have been zoned 'Green Belt', it is recommended that the subject lands be zoned 'Green Belt' instead of being not zoned.

This would be consistent with **Recommendation 2 of the OPR's submission on the Draft Plan**, which required the Planning Authority ‘*to omit the Strategic Land Reserve zoning from the site on the L3203 on the western approach to Grange Village and retain the Green Belt zoning*’.

19. Draft Direction on PAZ-57



19.1 Background information

PAZ-57 (Strandhill)	
Site area and location	4.02 ha at Carrowbunnaun Td.
Draft Plan zoning	Strategic Land Reserve (SLR)
Proposed amendment	Remove 4.02 ha of nRES from the Strategic Land Reserve (SLR)
OPR recommendation on material alteration	MA Recommendation 3 requests the Planning Authority to make the Plan without this amendment.
Chief Executive's response in the Third CE Report	As advised in the Second CE Report the CE does not support the making of this amendment and that position has now been reinforced by the numerous submissions received opposing the amendment as well as the submissions from prescribed bodies which detail that the lands are located in a peripheral location, outside the CSO boundary.

PAZ-57 (Strandhill)	
	<p>The release of an additional 4 hectares of lands from the SLR lacks consistency with the Core Strategy of the Draft Plan. No appropriate rationale has been provided for the addition of these lands to the 7 hectares already zoned nRES and MIX in the Draft Strandhill Village Plan.</p> <p>The Settlement Capacity Audit (SCA) confirmed there were sufficient sites ranked higher than the subject lands that, when aggregated, would have sufficient capacity to deliver the revised Core Strategy housing allocation for village in a sequential and coordinated manner.</p>
Adopted zoning	New residential uses (nRES)

19.2 Draft Direction Item 2(b)(xii)

b. Delete the following material alterations from the adopted County Development Plan such that the subject lands revert to as indicated in the draft County Development Plan:

(xii) PAZ 57, i.e. the subject lands revert to Strategic Land Reserve (SLR) from New Residential (nRES).

19.3 Submissions relating to Item 2(b)(xii)

A total of **78 submissions** were received in relation to Strandhill (representing 63% of the total submissions received). Of these, forty submissions (40) expressed concerns regarding PAZ-57, twenty-seven (27) expressed support for PAZ-57, seven submissions objected to PAZ-56 (not subject to the Draft Direction) and four (4) submissions did not refer to a PAZ or Draft Direction item.

Of the 40 submissions expressing concern regarding PAZ-57, 23 were identical or nearly identical (they appear to be based on a template).

Of the 27 submissions received in support of PAZ-57, nine submissions are identical, and 13 submissions also support PAZ-14 and PAZ-15.

The brief summaries of submissions are grouped in the following subsections:

19.3.1 Nearly-identical submissions supporting the Draft Direction (20 submissions)

19.3.2 Other (non-identical) submissions objecting to PAZ-57 or expressing concerns regarding residential zoning (20 submissions)

19.3.3 Submissions concerned about zoning in Strandhill, which do not mention the Draft Direction or a specific PAZ (4 submissions)

19.3.4 Submissions objecting to PAZ-56, which is not the subject of the Draft Ministerial Direction (7 submissions)

19.3.4 Identical submissions opposing the Draft Direction regarding PAZ-57 (9 submissions)

19.3.5 Other submissions opposing the Draft Direction regarding PAZ-57 (18 submissions)

For more detailed summaries of each submission, please refer to Appendix 2 of this Report.

19.3.1 Nearly-identical submissions supporting the Draft Direction

These submissions note that the Draft Ministerial Direction relates to “over 20 zoning objectives” and may result in the “removal” of approximately 70 hectares. The submissions welcome the intervention of the OPR and the Minister.

Some of these submissions indicated that the elected members’ decisions regarding PAZ-57 and PAZ-58 “displayed a complete lack of awareness of what is actually zoned at present and what the village of Strandhill village actually needs”.

Others stated that these rezonings fail to provide a cohesive/coherent/overall strategy for the area.

Some submissions noted that there is already a large amount of undeveloped zoned land in Strandhill (6.46 ha). Rezoning additional lands, up to 8.44 ha, “without proper consideration for proper planning and sustainable development” would not be necessary.

The submissions request the Council’s Chief Planner and the Chief Executive to “seek further direction from the Minister for Local Government regarding the removal of planning objective PAZ 58 from the Sligo County Development Plan 2024-2030, due to large Appendix of land already rezoned”.

It is also suggested that Sligo County Council engages with the local community collaboratively to create a masterplan for the village that “promotes integrated thinking rather than disparate individual land use plans that may cater only to vested interests, potentially neglecting community needs and the principles of proper planning and sustainable development”.

Submission 2	Tom Cafferky	https://consult.sligococo.ie/en/submission/slg-c57-2
Submission 5	Marian Dunleavy	https://consult.sligococo.ie/en/submission/slg-c57-5
Submission 7	Ken Russell	https://consult.sligococo.ie/en/submission/slg-c57-7
Submission 9	Peter Mahoney	https://consult.sligococo.ie/en/submission/slg-c57-9
Submission 10	Sinead O’Sullivan	https://consult.sligococo.ie/en/submission/slg-c57-10
Submission 11	John Sheridan	https://consult.sligococo.ie/en/submission/slg-c57-11
Submission 12	Regina O’Callaghan	https://consult.sligococo.ie/en/submission/slg-c57-12
Submission 13	Niamh McDermott	https://consult.sligococo.ie/en/submission/slg-c57-13
Submission 14	David Cullen	https://consult.sligococo.ie/en/submission/slg-c57-14
Submission 16	Laura Dunleavy	https://consult.sligococo.ie/en/submission/slg-c57-16
Submission 19	Colin Reddington	https://consult.sligococo.ie/en/submission/slg-c57-19
Submission 22	Carah Doherty	https://consult.sligococo.ie/en/submission/slg-c57-22
Submission 27	Alan O’Kelly	https://consult.sligococo.ie/en/submission/slg-c57-27
Submission 32	Niamh Gethin	https://consult.sligococo.ie/en/submission/slg-c57-32
Submission 41	Mary Keady	https://consult.sligococo.ie/en/submission/slg-c57-41
Submission 42	Pat Ryan	https://consult.sligococo.ie/en/submission/slg-c57-42
Submission 44	John Tuohy	https://consult.sligococo.ie/en/submission/slg-c57-44
Submission 46	Michelle Butler	https://consult.sligococo.ie/en/submission/slg-c57-46
Submission 62	Hazel and Jamie Feeney	https://consult.sligococo.ie/en/submission/slg-c57-62
Submission 78	Ronan Smyth	https://consult.sligococo.ie/en/submission/slg-c57-78

19.3.2 Other (non-identical) submissions objecting to PAZ-57 or expressing concerns regarding residential zoning

Submission 4 – Francis Clancy

<https://consult.sligococo.ie/en/submission/slg-c57-4>

This submission is similar to the template-based submissions summarized above. In addition, the author argues that there is a large quantum of land already rezoned for development in Strandhill, and further land should not be rezoned for the moment. The owners of currently zoned land *“should be made to commence development or lose the zoning”*.

Submission 6 – Ronan Keane

<https://consult.sligococo.ie/en/submission/slg-c57-6>

This submission argues that there are sufficient lands zoned within the built-up area of Strandhill without the need to include PAZ-57 and PAZ-58 sites. Before any additional lands are zoned in the village, Strandhill needs a comprehensive masterplan to guide the sustainable development of the village.

Submission 17 - Aonghus Collins

<https://consult.sligococo.ie/en/submission/slg-c57-17>

This submission is very similar to Submission 6 (see above). The author urges the Chief Executive and Chief Planner *“to seek further direction from the Minister for Local Government regarding the removal of planning objectives PAZ-57 and PAZ-58 from the Sligo County Development Plan 2024-2030, due to large Appendix of land already zoned in Strandhill”*.

Submission 21 – Tommy Lynch (PAZ-57)

<https://consult.sligococo.ie/en/submission/slg-c57-21>

This submission expresses concerns regarding the capacity of the existing wastewater and drainage infrastructure in Strandhill having regard to *“proposed residential developments in PAZ-57 and PAZ-58”*.

Submission 23 – Aine O'Donnell (PAZ-57)

<https://consult.sligococo.ie/en/submission/slg-c57-23>

This submission expresses concerns regarding the inclusion of additional PAZ-57 and PAZ-58 in the Draft Development Plan in terms of the capacity of local infrastructure, the lack of footpaths in the village, environmental concerns and the lack of a comprehensive masterplan for Strandhill.

Submission 24 – Gavin Foley (PAZ-57)

<https://consult.sligococo.ie/en/submission/slg-c57-24>

This submission, which is similar to the template-based submissions received in opposition to PAZ-57, states that a comprehensive masterplan is essential to ensure integrated and sustainable development of Strandhill while addressing the needs of its residents.

Submission 28 – Luke Saunders (PAZ-57)

<https://consult.sligococo.ie/en/submission/slg-c57-28>

This submission expresses concerns about the “*proposed increasing of zoning at PAZ-57*” having regard to the lack of footpaths, infrastructure deficits, pressure on the environment and traffic safety.

Submission 29 – Peter Marron (PAZ-57)

<https://consult.sligococo.ie/en/submission/slg-c57-29>

This author of this submission calls for the ‘refusal of the rezoning’ of the lands affected by PAZ-57 and PAZ-58 for several reasons, the main one being that “*all the additional traffic will have to pass the national school with consequent health and safety impacts for all the children of Strandhill*”.

Submission 30 – Shane Neary

<https://consult.sligococo.ie/en/submission/slg-c57-30>

This submission indicates that there is plenty of land zoned already in Strandhill. “*The Chief Planner and the Chief Executive of Sligo County Council are urged to seek further direction from the Minister for Local Government regarding the removal of planning objective PAZ 58*”. Strandhill needs a comprehensive masterplan.

Submission 31 – John Monahan

<https://consult.sligococo.ie/en/submission/slg-c57-31>

This submission discusses the implications of PAZ-57 and PAZ-58 in terms of the inadequacy of amenities in the village to cater for the consequent increase in population and re-iterates the point that Strandhill needs a Design Framework Plan to complement the Development Plan.

Submission 33 – Barry Carty

<https://consult.sligococo.ie/en/submission/slg-c57-33>

This submission states concerns regarding PAZ-57 and PAZ-58, with the “*key issues*” being the overburdening of local infrastructure, the lack of footpaths, impact on the environment, the lack of a masterplan. The submission also states that sufficient land is already zoned in the village.

Submission 34 – Aine Nic Amhlaidh

<https://consult.sligococo.ie/en/submission/slg-c57-34>

This submission argues that the Draft Direction should not have been necessary and requests that the lands subject to PAZ-56, PAZ-57 and PAZ-58 be dismissed. The submission also indicates that the amount of residential zoned land at present is more than Strandhill village wastewater system can safely manage. Sligo County Council’s Chief Executive is requested to “*seek further direction from the Minister for Local Government regarding the removal of planning objective PAZ-56, PAZ-57 and PAZ-58 from the Sligo County Development Plan 2024-2030, due to the incompatibility of these proposals with the sensitive landscape and the viable wastewater treatment options*”.

Submission 37 – Strandhill Community Development Association

<https://consult.sligococo.ie/en/submission/slg-c57-37>

Strandhill Community Development Association expresses concerns regarding “*proposed new housing plans which could potentially put serious pressure on village infrastructure, amenities and the environment*”, noting that “*the two developments; PAZ-57 and PAZ-58, when taken together would increase that number to between 373-596 housing units*”.

Submission 43 – Cian Allen-Kiely

<https://consult.sligococo.ie/en/submission/slg-c57-43>

This submission expresses concern regarding the “*inclusion of additional zoning areas (PAZ-57 and PAZ-58) in the Draft Development Plan*” and the consequent strain on the village in terms of village amenities, infrastructure, safety of pedestrians and children, environment and tourism.

Submission 49 - Bernard Mulhern

<https://consult.sligococo.ie/en/submission/slg-c57-49>

This submission expresses serious concerns regarding the inclusion of PAZ-57 in the Development Plan and argues that Strandhill needs a Community Centre. The lands the subject of PAZ-57 should be zoned for recreational use.

Submission 51 – Board of Management, Scoil Asicus Naofa

<https://consult.sligococo.ie/en/submission/slg-c57-51>

This submission welcomes the Minister’s Direction regarding PAZ-57. Any proposed rezoning should be accompanied by a comprehensive plan for the future growth of the village. The school does not have the capacity to cater for increased numbers.

Submission 59 – Brian Collery

<https://consult.sligococo.ie/en/submission/slg-c57-59>

This submission welcomes the Minister’s Direction regarding PAZ-57, arguing that it would have increased the amount of land zoned in Strandhill disproportionately, and calling for a comprehensive masterplan for the village.

Submission 71 – Robbie Henneberry on behalf of Strandhill Golf Club

<https://consult.sligococo.ie/en/submission/slg-c57-71>

Strandhill Golf Club has serious concerns about the excessive additional residential zoning in Strandhill, specifically PAZ-57, and the resulting substantial negative impact on the Golf Club and its development, without the provision of necessary infrastructure.

Submission 77 – Ocean Links Residents’ Association

<https://consult.sligococo.ie/en/submission/slg-c57-77>

The submission expresses concerns in relation to PAZ-57, specifically relating to the potential overdevelopment of Strandhill, traffic safety at the junction of the Golf Course Road and Shore Road, inadequate infrastructure, amenities and a lack of community and social services.

Submission 110 – Aine Nic Amhlaidh

<https://consult.sligococo.ie/en/submission/slg-c57-110>

The submissions “*supports the refusal of rezoning of PAZ-57*” for several reasons, including inadequate wastewater infrastructure, lack of environmental and archaeological assessments. The author requests that Sligo County Council “*refuse this rezoning as well as PAZ-58 and PAZ-56*”.

19.3.3 Submissions concerned about zoning in Strandhill, which do not mention the Draft Direction or a specific PAZ

Submission 3 – John Bohan

<https://consult.sligococo.ie/en/submission/slg-c57-3>

This submission does not refer specifically to PAZ-57 but expresses concerns regarding the increase in the number of dwellings in Strandhill and the potential “*hugely disruptive growth*”.

Submission 8 – Eileen O’Connor

<https://consult.sligococo.ie/en/submission/slg-c57-8>

The submission objections to “*Appendix and design of houses on Golf Club Road and Airport Road*”.

Submission 40 – Mary Allen-Kiely

<https://consult.sligococo.ie/en/submission/slg-c57-40>

The author objects “*to the development plan*” for several reasons, such as overpopulation, lack of infrastructure, overburdening of wastewater treatment facilities, traffic safety and concerns for the natural environment.

Submission 48 – Noel Kelly

<https://consult.sligococo.ie/en/submission/slg-c57-48>

The submission expresses concerns regarding the “*plans for Strandhill Village in the Sligo County Development Plan 2024-2030*” in terms of the potential increase of up 1,088 new residents to the village. If such a change is necessary, it should be properly planned “*with input from the appropriate community groups, local residents, and technical experts*”.

19.3.4 Submissions objecting to PAZ-56, which is not the subject of the Draft Ministerial Direction

Submission 35 – Aine Nic Amhlaidh

<https://consult.sligococo.ie/en/submission/slg-c57-35>

This submission expresses concern about PAZ-56 (not the subject of the Draft Ministerial Direction), quoting OPR's recommendations on Material Amendments and the Third Chief Executive's Report. For a detailed summary of this submission, refer to Appendix 2 of this Report.

Submission 45 – Mary Quinn

<https://consult.sligococo.ie/en/submission/slg-c57-45>

The intervention of the Office of the Planning Regulator and the Minister of State for Local Government, in relation to PAZ-56, PAZ-57 and PAZ-58, is welcomed. The main subject in the submission is PAZ-56 to which the author is opposed for several reasons, such as its peripheral location and lack of services.

Submission 47 – Adrian Hamilton

<https://consult.sligococo.ie/en/submission/slg-c57-47>

This submission requests *"the removal of zoning objective PAZ 56 from the County Development Plan"* for reasons, such as its peripheral location and lack of services.

Submission 83 – Henrietta Veale

<https://consult.sligococo.ie/en/submission/slg-c57-83>

This submission objects to PAZ-56 (not the subject of the Draft Ministerial Direction) for several reasons, such as its peripheral location and lack of services.

Submission 90 – John Monahan

<https://consult.sligococo.ie/en/submission/slg-c57-90>

The submission objects to PAZ-56 (not the subject of the Draft Ministerial Direction) for several reasons, such as its prominent location in a visually sensitive area, lack of services and potential traffic hazards.

Submission 112 – Owen Mc Kirdy

<https://consult.sligococo.ie/en/submission/slg-c57-112>

This submission expresses concern about PAZ-56 (not the subject of the Draft Ministerial Direction) for several reasons, such as its sensitive location and lack of services, quoting from previous Chief Executive's reports.

Submission 113 – Arianna Mc Kirdy

<https://consult.sligococo.ie/en/submission/slg-c57-113>

This submission objects to PAZ-56 (not the subject of the Draft Ministerial Direction) which *"is NOT consistent with the core strategy of proper planning and sustainable development"*.

19.3.4 Identical submissions opposing the Draft Direction with regard to PAZ-57

Nine identical submissions were received in support of the making of PAZ-57. These submissions express support for the nRES (new residential uses) zoning of the lands subject of PAZ-57 for the following reasons:

- the wastewater treatment plant has sufficient capacity;
- there is a current planning application submitted for this site;
- there is an urgent need for housing to be provided in Strandhill;
- the site is situated in the village core, adjacent to “residential zoned lands owned by Sligo County Council where a social housing scheme is proposed to be developed next year” and is “sequentially preferable” to all the currently zoned residential lands in Strandhill;
- the site is serviced and identified as a Tier 1 site in the CDP Infrastructural Assessment.

The submissions note that the site was previously zoned residential, from 2003 to 2013, and that the lands were placed in the Strategic Land Reserve “as a short-term measure” due to the 2008 economic downturn.

Submission 64	Eileen Carty	https://consult.sligococo.ie/en/submission/slg-c57-64
Submission 66	Carty Contractors	https://consult.sligococo.ie/en/submission/slg-c57-66
Submission 68	Patrick Carty	https://consult.sligococo.ie/en/submission/slg-c57-68
Submission 69	Karl Hannon	https://consult.sligococo.ie/en/submission/slg-c57-69
Submission 74	Kathleen Gallagher	https://consult.sligococo.ie/en/submission/slg-c57-74
Submission 75	Ann Marie Gavin	https://consult.sligococo.ie/en/submission/slg-c57-75
Submission 76	Niall Carty	https://consult.sligococo.ie/en/submission/slg-c57-76
Submission 80	Valerie Robinson	https://consult.sligococo.ie/en/submission/slg-c57-80
Submission 81	Carol Gallagher	https://consult.sligococo.ie/en/submission/slg-c57-81

19.3.5 Other submissions opposing the Draft Direction regarding PAZ-57

Submission 70 – Beldare Homes

<https://consult.sligococo.ie/en/submission/slg-c57-70>

This submission supports the retention of residential (nRES) zoning for the site subject to PAZ-57, arguing that such zoning is fully in accordance with the national and regional planning policy, the Development Plan Guidelines for Planning Authorities and the principles of proper planning and sustainable development.

For a more detailed summary of this submission, refer to Appendix 2 of this Report.

Submission 85 – Mark Kelly

<https://consult.sligococo.ie/en/submission/slg-c57-85>

The submission supports the rezoning of lands in Strandhill, i.e. PAZ-57. The author urges the Minister *“to consider the zoning of PAZ 57, 14 & 15 as well as all of the other proposed residential zoning locations as vital to the growth of Sligo and the Northwest”*.

Submission 86 – David McMunn

<https://consult.sligococo.ie/en/submission/slg-c57-86>

This submission states that this land (PAZ-57) should be rezoned as the author has *“a lot of relatives and friends hoping to relocate to Sligo and especially Strandhill where it is impossible to get a new home”*.

Submission 88 – Stephen Taheny

<https://consult.sligococo.ie/en/submission/slg-c57-88>

This submission states that more land is needed for housing, as *“more housing will encourage young people to come home to Sligo”*. PAZ-57 is noted as being the specific location.

Submission 89 – Erin Regan

<https://consult.sligococo.ie/en/submission/slg-c57-89>

The submission supports the rezoning of lands in Strandhill (PAZ-57) and Hazelwood (PAZ-14 and PAZ-15). The author urges the Minister *“to consider the zoning of PAZ 57, 14 & 15 as well as all of the other proposed residential zoning locations as vital to the growth of Sligo and the Northwest”*.

Submission 92 – Kelly Energy and Engineering Services

<https://consult.sligococo.ie/en/submission/slg-c57-92>

The submission supports the rezoning of lands in Strandhill (PAZ-57) and Hazelwood (PAZ-14 and PAZ-15) and suggests that *“all lands which have previously been proposed for zoning are vital to the growth of Sligo and the wellbeing of its inhabitants”*.

Submission 93 – Barry White

<https://consult.sligococo.ie/en/submission/slg-c57-93>

This submission supports PAZ-57 on the basis that the site is a Tier 1 site which *“has already had a planning application submitted indicating clear intent to bring the project forward for development in the lifetime of the next CDP”*.

Submission 94 – Ronan Gray

<https://consult.sligococo.ie/en/submission/slg-c57-94>

The submission supports the rezoning of lands in Strandhill (PAZ-57) and Hazelwood (PAZ-14 and PAZ-15). The author urges the Minister *“to consider the zoning of PAZ 57, 14 & 15 as well as all of the other proposed residential zoning locations as vital to the growth of Sligo and the Northwest”*.

Submission 95 – Anne McConnon

<https://consult.sligococo.ie/en/submission/slg-c57-95>

The submission supports the rezoning of lands in Strandhill (PAZ-57) and Hazelwood (PAZ-14 and PAZ-15). The author urges the Minister *“to consider the zoning of PAZ 57, 14 & 15 as well as all of the other proposed residential zoning locations as vital to the growth of Sligo and the Northwest”*.

Submission 97 – Margaret Malarney

<https://consult.sligococo.ie/en/submission/slg-c57-97>

The submission supports the rezoning of lands in Strandhill (PAZ-57), Hazelwood (PAZ-14 and PAZ-15). The author urges the Minister *“to consider the zoning of PAZ 57, 14 & 15 as well as all of the other proposed residential zoning locations as vital to the growth of Sligo and the Northwest”*.

Submission 98 – Barry White

<https://consult.sligococo.ie/en/submission/slg-c57-98>

In relation to PAZ-57, the author points out that *“the sites proposed for new residential zoning in Strandhill have been proposed for 3 development plan cycles (over 18 years) and have not delivered one single housing unit in this time frame”*.

Submission 99 – Rachel Byrne

<https://consult.sligococo.ie/en/submission/slg-c57-99>

This submission supports the rezoning of lands in Strandhill (PAZ-57), Hazelwood (PAZ-14 and PAZ-15). The author urges the [Minister?] *“to consider the zoning of PAZ-57 and PAZ-14, PAZ-15 and any other site that will benefit the housing supply in Sligo”*.

Submission 100 – Rory Kelly

<https://consult.sligococo.ie/en/submission/slg-c57-100>

The submission supports the rezoning of lands throughout County Sligo, in particular in Strandhill (PAZ-57), Hazelwood (PAZ-14 and PAZ-15). The author urges the Minister *“to consider the zoning of PAZ 57, 14 & 15 as well as all of the other proposed residential zoning locations as vital to the growth of Sligo and the Northwest”*.

Submission 101 – Gaven Heeran

<https://consult.sligococo.ie/en/submission/slg-c57-101>

The submission supports PAZ-57, PAZ-14 and PAZ-15, indicating that *“there is an urgent requirement for housing in the Strandhill area”*. The author suggests that *“the site should now be released from SLR and zoned as New Residential in order to plan for the sustainable and proper development of Strandhill village and Hazelwood”*.

Submission 102- Helen Connaughton

<https://consult.sligococo.ie/en/submission/slg-c57-102>

The submission supports the rezoning of lands in Strandhill and Hazelwood, i.e. PAZ-57, PAZ-14 and PAZ-15. The author urges [the Minister?] *“to allow the rezoning of these lands to assist in the growth of the town we love and wish to continue to live in”*.

Submission 103 – Paddy Flynn

<https://consult.sligococo.ie/en/submission/slg-c57-103>

The submission supports the rezoning of lands in both Strandhill and Hazelwood *“due to the lack of housing in Sligo and surrounding areas”*.

Submission 104 – Peter Clarke

<https://consult.sligococo.ie/en/submission/slg-c57-104>

The submission is titled *“PAZ-57, 14, 15”* and states that *“we need more land for housing, absolutely crazy not to be zoning these lands”*.

Submission 106 - Thomas Regan

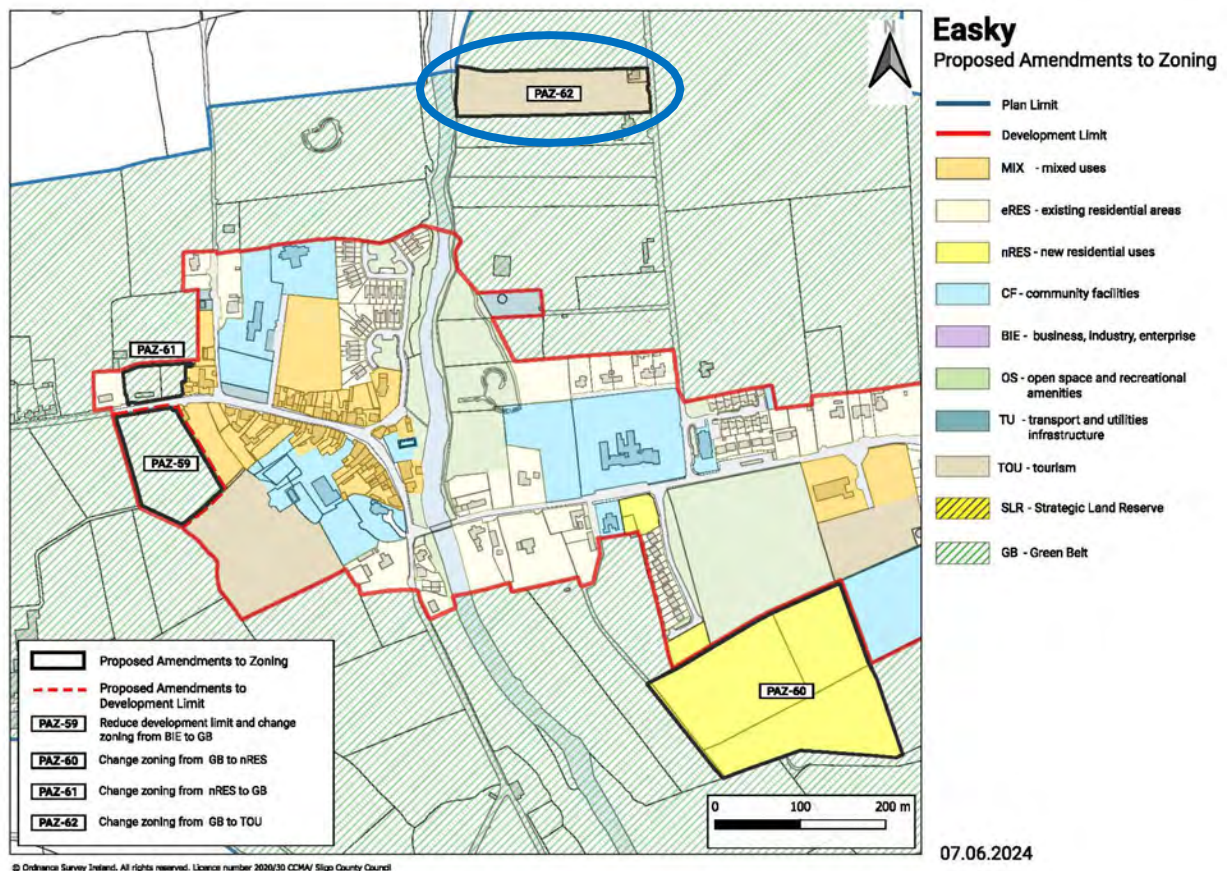
<https://consult.sligococo.ie/en/submission/slg-c57-106>

This submission is entitled *“PAZ-57 and PAZ-14,15”* and states: *“more housing in Sligo and surrounding areas needed”*.

19.4 Chief Executive’s recommendation on Item 2(b)(xii)

Consistent with the Chief Executive’s recommendation contained in the Third Chief Executive’s Report in respect of PAZ 57, the subject lands should revert to Strategic Land Reserve (SLR).

20. Draft Direction on PAZ-62



20.1 Background information

PAZ-62 (Easky)	
Site area and location	1.20 ha at Castletown Td.
Draft Plan zoning	Green Belt
Proposed amendment	Change the zoning of 1.20 ha from GB to TOU
OPR recommendation on material alteration	MA Recommendation 5 and MA Recommendation 8 request the Planning Authority to make the Plan without this amendment.
Chief Executive's response in the Third CE Report	<p>The CE concurs with the concerns raised by the prescribed bodies and acknowledges the numerous submissions received opposing the proposed amendment.</p> <p>The subject lands are neither fully serviced (Tier 1), nor serviceable during the six-year period of the CDP 2024–2030 (Tier 2).</p>

PAZ-62 (Easky)	
	<p>The lands are located outside the CSO (2016) Settlement Boundary, in a peripheral location. The redesignation of these lands from GB to TOU does not represent a sequential approach to zoning, in particular as it 'leapfrogs' lands designated green belt.</p> <p>The lands are located along a designated scenic route. The proposed zoning of this site would have an adverse impact on the visual amenities of the scenic route at this sensitive coastal location.</p> <p>For the above reasons, the CE does not support the making of this Proposed Amendment.</p>
Adopted zoning	Tourism-related uses (TOU)

20.2 Draft Direction Item 2(b)(xiii)

b. Delete the following material alterations from the adopted County Development Plan such that the subject lands revert to as indicated in the draft County Development Plan:

(xiii) PAZ 62, i.e. the subject lands revert to Green Belt from Tourism (TOU).

20.3 Submissions relating to Item 2(b)(xiii)

Only one submission has been received in relation to this item: the NWRA supports the Draft Direction.

Submission 15 – Northern and Western Regional Assembly (extract)

<https://consult.sligococo.ie/en/submission/slg-c57-15>

The NWRA indicates that, in its submission dated 05 July 2024, the Regional Assembly did not address zoning amendments for lands located outside the Regional Growth Centre, i.e. Sligo Town.

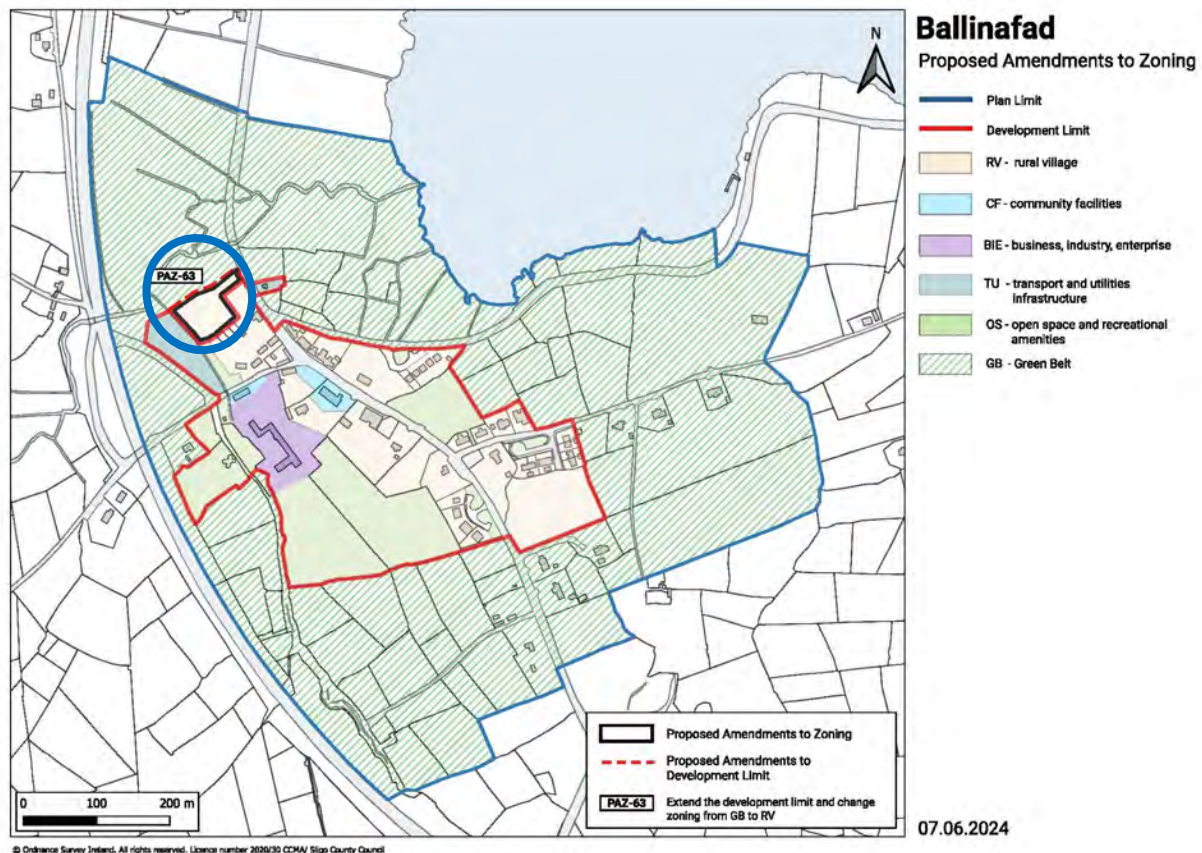
Therefore, the submission does not contain specific comments on Items 2 a(i) and 2 b(vii)-(xx) (i.e. PAZ-31, PAZ-32, PAZ-33, PAZ-34, PAZ-41, PAZ-42, PAZ-44, PAZ-45, PAZ-57, PAZ-61, **PAZ-62**, PAZ-63, PAZ-76, PAZ-79, PAZ-80) of the Draft Ministerial Direction.

However, the Assembly indicates its support for the concept of compact growth, as outlined in the Regional Spatial and Economic Strategy and in particular Regional Policy Objectives RPO 3.1, RPO 3.2(b), RPO 3.2 (c), RPO 3.3, RPO 3.4 and RPO 3.7.39. Considering the cumulative impact of the zonings referred to in Items 2(a)(i) and 2(b)(i)-(xx), the Assembly fully supports the Draft Ministerial Direction.

20.4 Chief Executive's recommendation on Item 2(b)(xiii)

Consistent with the Chief Executive's recommendation contained in the Third Chief Executive's Report in respect of PAZ-62, the subject lands should revert to Green Belt zoning.

21. Draft Direction on PAZ-63



21.1 Background information

PAZ-63 (Ballinafad)	
Site area and location	0.49 ha at Gortalough Td
Draft Plan zoning	Green Belt
Proposed amendment	Extend the development limit and change the zoning of 0.49 ha from GB to RV.
OPR recommendation on material alteration	MA Recommendation 8 requests the Planning Authority to make the Plan without this amendment.
Chief Executive's response in the Third CE Report	The CE does not support the making of the proposed amendment as the lands are neither fully serviced (Tier 1), nor serviceable during the six-year

PAZ-63 (Ballinafad)	
	period of the CDP 2024–2030 (Tier 2) and would fail the Justification Test under the Flood Risk Management Guidelines for Planning Authorities.
Adopted zoning	Rural village uses (RV)

21.2 Draft Direction Item 2(b)(xiv)

b. Delete the following material alterations from the adopted County Development Plan such that the subject lands revert to as indicated in the draft County Development Plan:

(xiv) PAZ 63, i.e. the subject lands revert to Green Belt (GB) from Rural Village (RV).

21.3 Submissions relating to Item 2(b)(xiv)

One submission has been received in support of the Draft Direction (from the NWRA), while another submission (prepared by a consultant representing the landowner) argues in favour of retaining the residential zoning of the lands, thereby opposing the Draft Direction.

Uisce Éireann's submission provides additional details on water service infrastructure.

21.3.1 Submission supporting the Draft Direction

Submission 15 – NW Regional Assembly (extract)

<https://consult.sligococo.ie/en/submission/slg-c57-15>

The NWRA indicates that, in its submission dated 05 July 2024, the Regional Assembly did not address zoning amendments for lands located outside the Regional Growth Centre, i.e. Sligo Town.

Therefore, the submission does not contain specific comments on Items 2 a(i) and 2 b(vii)-(xx) (i.e. PAZ-31, PAZ-32, PAZ-33, PAZ-34, PAZ-41, PAZ-42, PAZ-44, PAZ-45, PAZ-57, PAZ-61, **PAZ-63**, PAZ-76, PAZ-79, PAZ-80) of the Draft Ministerial Direction.

However, the Assembly indicates its support for the concept of compact growth, as outlined in the Regional Spatial and Economic Strategy and in particular Regional Policy Objectives RPO 3.1, RPO 3.2(b), RPO 3.2 (c), RPO 3.3, RPO 3.4 and RPO 3.7.39.

Considering the cumulative impact of the zonings referred to in Items 2(a)(i) and 2(b)(i)-(xx), the Assembly fully supports the Draft Ministerial Direction.

21.3.2 Submission opposing the Draft Direction

Submission 61 – Darren Clancy on behalf Keith Carty

<https://consult.sligococo.ie/en/submission/slg-c57-61>

The submission supports the New Residential (nRES) zoning of the site subject to PAZ-63 in Ballinafad and contends that the lands are suitable for residential development having regard to the availability of services in proximity to the site (i.e. watermain, foul sewer, surface water drainage, public roads and footpaths).

For a more detailed summary of this submission, please refer to Appendix 2 of this Report.

21.3.3 Submission 73 – Uisce Éireann (extract)

<https://consult.sligococo.ie/en/submission/slg-c57-73>

In addition to previous commentary (provided at Proposed Amendments stage), UÉ advises that in relation to PAZ-63, the potential for servicing the site has now been reviewed in further detail:

- *“An extension of approximately 90 m from the site along the road would be required to the site entrance shown on the zoning map.*
- *A potential alternative would be to connect via the adjacent estate to the south-west of the site with a shorter extension, but this may require third-party permissions.*
- *Development in areas at risk of flooding increase the level of complexity and the cost providing water services.*
- *Water supply in this area as it is provided by a private Group Water Scheme, Corrick GWS).”*

21.4 Chief Executive’s recommendation on Item 2(b)(xiv)

Contrary to the previous submission from Uisce Éireann (at Proposed Amendments stage), which indicated that network extensions of in excess 150 m would be required to service the lands, it has now been established that the nearest point of connection to the public sewer is at only 35 m from the site.

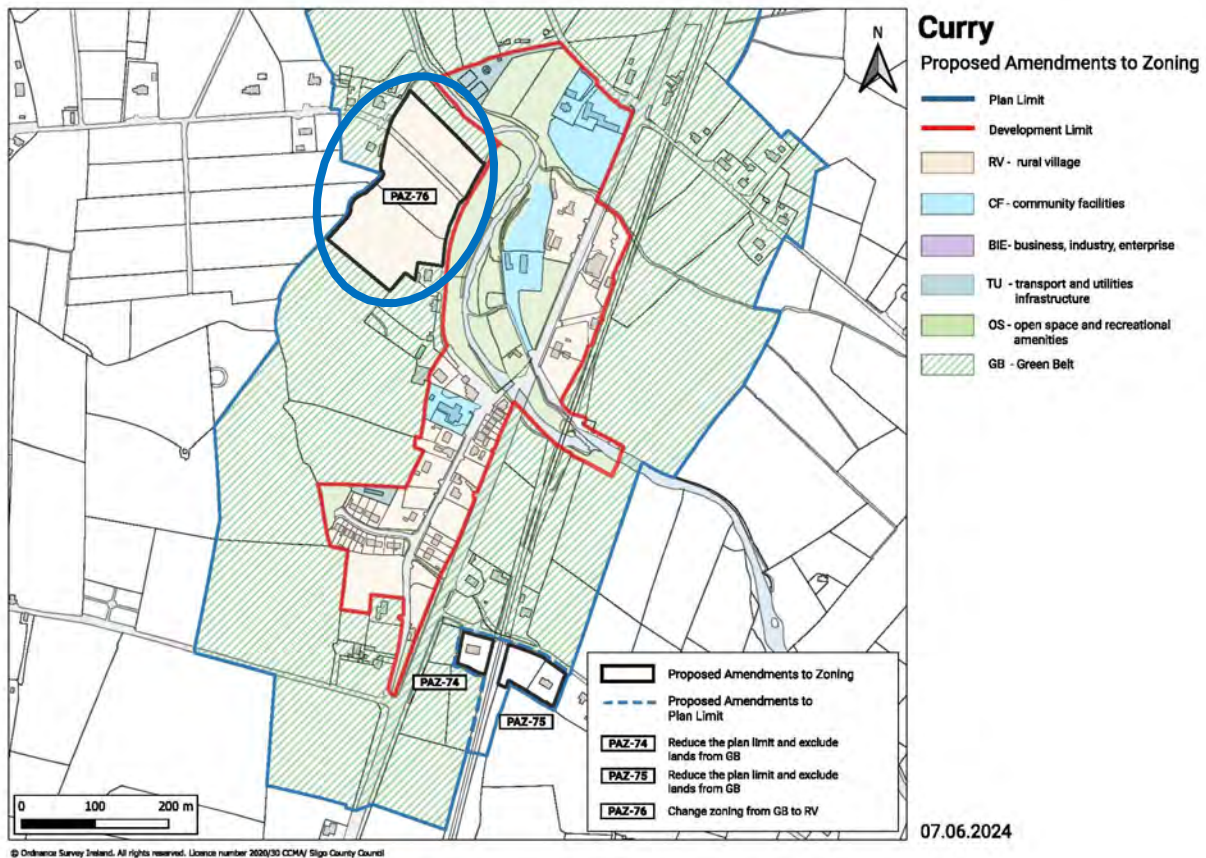
Taken together with the other available public infrastructure in the vicinity of the site, the Chief Executive accepts that the subject lands can be described as serviceable within the life of the Plan.

The Chief Executive also accepts that the subject lands can be developed without any part of the proposed scheme encroaching onto the lands identified as Flood Zone A or B.

Having regard to the above, the Chief Executive recommends that the portion of the site subject to PAZ-63 which overlaps with Flood Zone A or B revert to Green Belt zoning.

The remainder of the site should be zoned Rural Village (RV) and included within the Development Limit for Ballinafad.

22. Draft Direction on PAZ-76



22.1 Background information

PAZ-76 (Curry)	
Site area and location	2.89 ha at Curry Td.
Draft Plan zoning	Green Belt
Proposed amendment	Change the zoning of 2.89 ha from GB to RV.
OPR recommendation on material alteration	MA Recommendation 4 and MA Recommendation 8 request the Planning Authority to make the Plan without this amendment.

PAZ-76 (Curry)	
Chief Executive's response in the Third CE Report	<p>The subject lands are neither fully serviced (Tier 1), nor serviceable during the six-year period of the CDP 2024–2030 (Tier 2).</p> <p>The site is outside the development limit defined in the draft plan, in a peripheral location, not contiguous to the built-up area. Its redesignation would not follow the sequential approach to zoning.</p> <p>Having regard to the above and as advised in the Second Chief Executive's Report, the CE does not support PAZ-76.</p>
Adopted zoning	Rural village uses (RV)

22.2 Draft Direction Item 2(b)(xv)

b. Delete the following material alterations from the adopted County Development Plan such that the subject lands revert to as indicated in the draft County Development Plan:

(xv) PAZ 76, i.e. the subject lands revert to Green Belt (GB) from Rural Village (RV).

22.3 Submissions relating to Item 2(b)(xv)

The only submission in relation to this item was received from the NWRA, which supports the Draft Direction.

Uisce Éireann's submission provides additional details on water service infrastructure.

22.3.1 Submission supporting the Draft Direction

Submission 15 – Northern and Western Regional Assembly (extract)

<https://consult.sligococo.ie/en/submission/slg-c57-15>

The NWRA indicates that, in its submission dated 05 July 2024, the Regional Assembly did not address zoning amendments for lands located outside the Regional Growth Centre, i.e. Sligo Town.

Therefore, the submission does not contain specific comments on Items 2 a(i) and 2 b(vii)-(xx) (i.e. PAZ-31, PAZ-32, PAZ-33, PAZ-34, PAZ-41, PAZ-42, PAZ-44, PAZ-45, PAZ-57, PAZ-61, PAZ-63, **PAZ-76**, PAZ-79, PAZ-80) of the Draft Ministerial Direction.

However, the Assembly indicates its support for the concept of compact growth, as outlined in the Regional Spatial and Economic Strategy and in particular Regional Policy Objectives RPO 3.1, RPO 3.2(b), RPO 3.2 (c), RPO 3.3, RPO 3.4 and RPO 3.7.39.

Considering the cumulative impact of the zonings referred to in Items 2(a)(i) and 2(b)(i)-(xx), the Assembly fully supports the Draft Ministerial Direction.

22.3.2 Submission 73 – Uisce Éireann (extract)

<https://consult.sligococo.ie/en/submission/slg-c57-73>

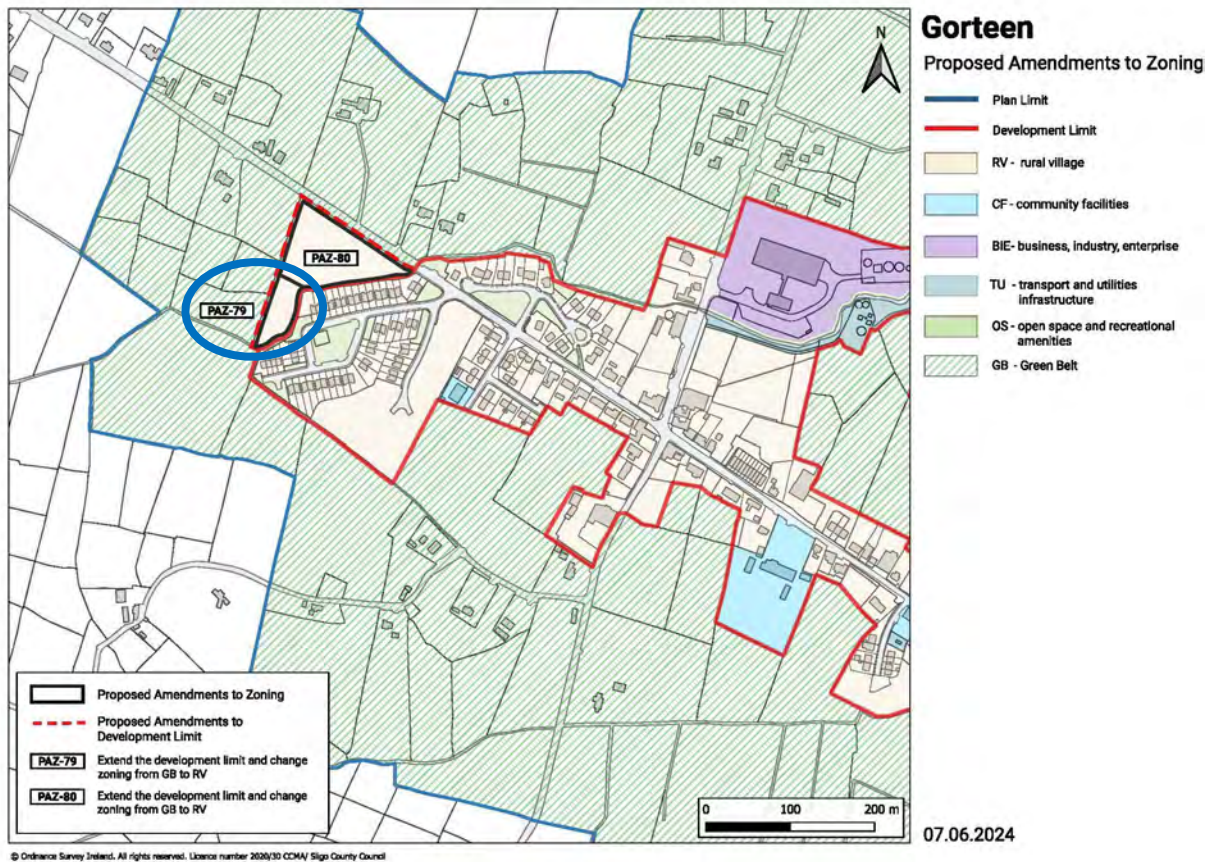
In addition to previous commentary (provided at Proposed Amendments stage), UÉ advises the following in relation to PAZ-76:

- *A long network extension (greater than 150 m) may be required to connect to the sewer in the village core.*
- *A potential alternative would be to connect to the Curry pumping station, but this would require a river crossing into the pumping station. An upgrade of the station would likely be required to cater for full development of the site.*

22.4 Chief Executive's recommendation on Item 2(b)(xv)

Consistent with the Chief Executive's recommendation contained in the Third Chief Executive's Report in respect of PAZ-76, the subject lands should revert to Green Belt zoning.

23. Draft Direction on PAZ-79



23.1 Background information

PAZ-79 (Gorteen)	
Site area and location	0.26 ha at Knocknashammer Td.
Draft Plan zoning	Green Belt
Proposed amendment	Extend the development limit and change the zoning of 0.26 ha from GB to RV.
OPR recommendation on material alteration	MA Recommendation 4 and MA Recommendation 8 request the Planning Authority to make the Plan without this amendment.
Chief Executive's response in the Third CE Report	The CE does not support the making of the proposed amendment as the lands are neither fully serviced (Tier 1), nor serviceable during the six-year period of the CDP 2024–2030 (Tier 2), would be inconsistent with the

PAZ-79 (Gorteen)	
	sequential approach to zoning and would fail the Justification Test under the Flood Risk Management Guidelines for Planning Authorities.
Adopted zoning	Rural village uses (RV)

23.2 Draft Direction Item 2(b)(xvi)

b. Delete the following material alterations from the adopted County Development Plan such that the subject lands revert to as indicated in the draft County Development Plan:

(xvi) PAZ 79, i.e. the subject lands revert to Green Belt (GB) from Rural Village (RV), and the development limit reverts to the draft plan.

23.3 Submissions relating to Item 2(b)(xvi)

Only one submission has been received in relation to this item: the NWRA supports the Draft Direction.

Submission 15 – Northern and Western Regional Assembly (extract)

<https://consult.sligococo.ie/en/submission/slg-c57-15>

The NWRA indicates that, in its submission dated 05 July 2024, the Regional Assembly did not address zoning amendments for lands located outside the Regional Growth Centre, i.e. Sligo Town.

Therefore, the submission does not contain specific comments on Items 2 a(i) and 2 b(vii)-(xx) (i.e. PAZ-31, PAZ-32, PAZ-33, PAZ-34, PAZ-41, PAZ-42, PAZ-44, PAZ-45, PAZ-57, PAZ-61, PAZ-63, PAZ-76, **PAZ-79**, PAZ-80) of the Draft Ministerial Direction.

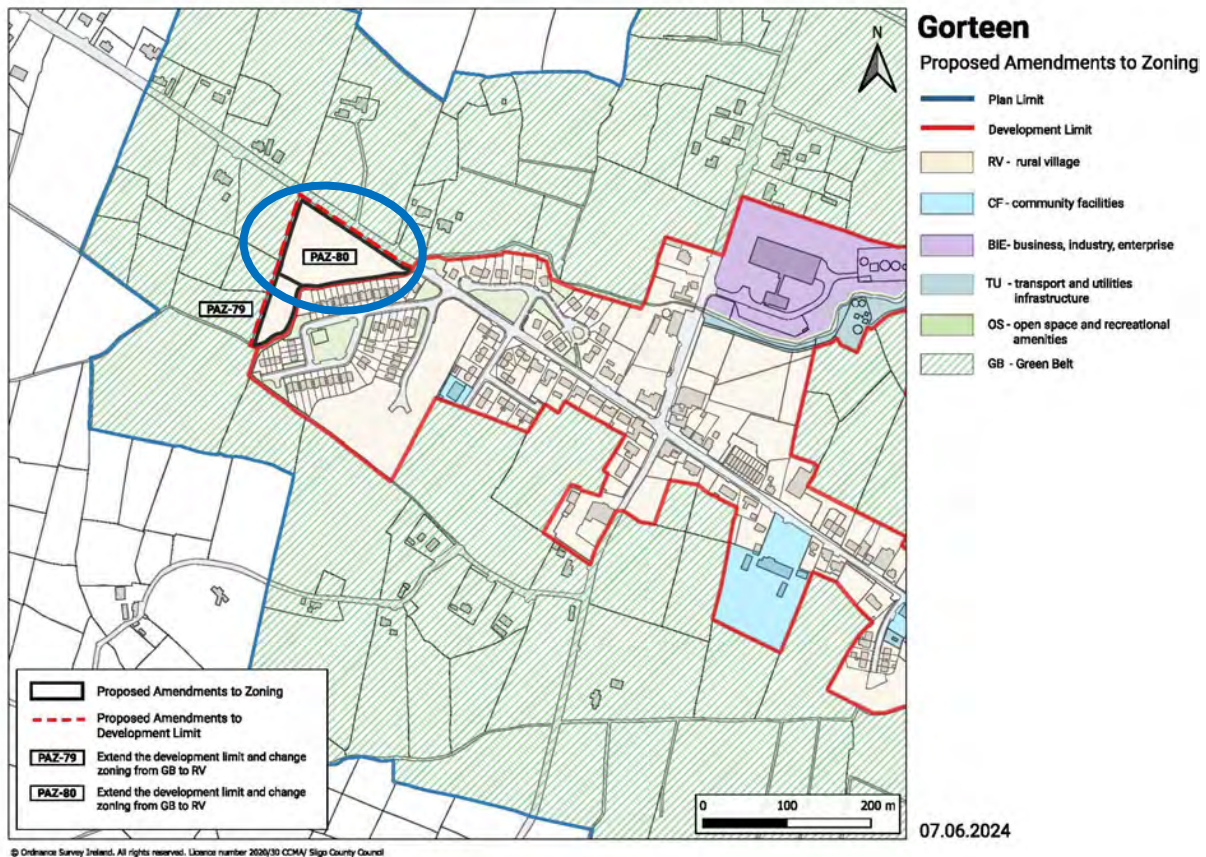
However, the Assembly indicates its support for the concept of compact growth, as outlined in the Regional Spatial and Economic Strategy and in particular Regional Policy Objectives RPO 3.1, RPO 3.2(b), RPO 3.2 (c), RPO 3.3, RPO 3.4 and RPO 3.7.39.

Considering the cumulative impact of the zonings referred to in Items 2(a)(i) and 2(b)(i)-(xx), the Assembly fully supports the Draft Ministerial Direction.

23.4 Chief Executive's recommendation on Item 2(b)(xvi)

Consistent with the Chief Executive's recommendation contained in the Third Chief Executive's Report in respect of PAZ-79, the subject lands should revert to Green Belt zoning and the Development Limit should revert to that designated in the Draft Plan.

24. Draft Direction on PAZ-80



24.1 Background information

PAZ-80 (Gorteen)	
Site area and location	0.91 ha at Knocknashammer Td.
Draft Plan zoning	Green Belt
Proposed amendment	Extend the development limit and change the zoning of 0.91 ha from GB to RV.
OPR recommendation on material alteration	MA Recommendation 4 and MA Recommendation 8 request the Planning Authority to make the Plan without this amendment.
Chief Executive's response in the Third CE Report	The CE does not support the making of the proposed amendment as the lands are neither fully serviced (Tier 1), nor serviceable during the six-year period of the CDP 2024–2030 (Tier 2), would be inconsistent with the

PAZ-80 (Gorteen)	
	sequential approach to zoning and would fail the Justification Test under the Flood Risk Management Guidelines for Planning Authorities.
Adopted zoning	Rural village uses (RV)

24.2 Draft Direction Item 2(b)(xvii)

b. Delete the following material alterations from the adopted County Development Plan such that the subject lands revert to as indicated in the draft County Development Plan:

(xvii) PAZ 80, i.e. the subject lands revert to Green Belt (GB) from Rural Village (RV) and the Development Limit reverts to the draft Plan.

24.3 Submissions relating to Item 2(b)(xvii)

The NWRA submission relating to this item supports the Draft Direction.

Uisce Éireann's submission provides additional details on water service infrastructure.

24.3.1 Submission supporting the Draft Direction

Submission 15 – NW Regional Assembly (extract)

<https://consult.sligococo.ie/en/submission/slg-c57-15>

The NWRA indicates that, in its submission dated 05 July 2024, the Regional Assembly did not address zoning amendments for lands located outside the Regional Growth Centre, i.e. Sligo Town.

Therefore, the submission does not contain specific comments on Items 2 a(i) and 2 b(vii)-(xx) (i.e. PAZ-31, PAZ-32, PAZ-33, PAZ-34, PAZ-41, PAZ-42, PAZ-44, PAZ-45, PAZ-57, PAZ-61, PAZ-63, PAZ-76, PAZ-79, **PAZ-80**) of the Draft Ministerial Direction.

However, the Assembly indicates its support for the concept of compact growth, as outlined in the Regional Spatial and Economic Strategy and in particular Regional Policy Objectives RPO 3.1, RPO 3.2(b), RPO 3.2 (c), RPO 3.3, RPO 3.4 and RPO 3.7.39.

Considering the cumulative impact of the zonings referred to in Items 2(a)(i) and 2(b)(i)-(xx), the Assembly fully supports the Draft Ministerial Direction.

24.3.2 Submission 73 – Uisce Éireann (extract)

<https://consult.sligococo.ie/en/submission/slg-c57-73>

In addition to previous commentary (provided at Proposed Amendments stage), UÉ advises the following in relation to PAZ-80:

- *Likely connection would be to the Gurteen View WWPS, approximately 60 m from PAZ-80, via the road (river crossing required).*
- *The reference to third-party permissions potentially being required was related to ownership of the Gurteen View WWPS, but UÉ can now confirm that the WWPS is UÉ owned.*

24.4 Chief Executive's recommendation on Item 2(b)(xvii)

Consistent with the Chief Executive's recommendation contained in the Third Chief Executive's Report in respect of PAZ-80, the subject lands should revert to Green Belt zoning and the Development Limit should revert to that designated in the Draft Plan.

25. Draft Direction on PA-180

25.1 Background information

PA-180 (Chapter 33 Development management standards, Section 33.9 Access onto national roads)	
Initial text in Draft Plan	Sight distances for access on to national roads <p>The sight distances required for access onto national primary and secondary roads are set out in Table 33.8. The sight distances are measured from the access point to the near-side edge of the carriageway in accordance with the <i>Design Manual for Roads and Bridges</i>.</p>
PA-180 (as initially published)	<p>In Section 33.9.1 Access onto national roads, modify the first paragraph under the heading Sight distances for access onto national roads as follows:</p> <p>Where direct vehicular access onto national primary roads cannot be avoided, a Departure from TII Publications Standards DN-GEO-03060 with justification shall be required. The sight distances required for access onto national primary and secondary roads are set out in Table 33.8. The sight distances are measured from the access point to the near-side edge of the carriageway in accordance with the Design Manual for Roads and Bridges TII Publications Standards DN-GEO-03031 and DN-GEO-03060.</p>
OPR recommendation on material alteration	<p>MA Recommendation 6 requests the Planning Authority to make the Plan without this amendment.</p>
Chief Executive's response in the Third CE Report	<p>PA-180 does not relate to additional access points from new development.</p> <p>There are situations where a new direct access onto a national road is unavoidable. A "new" direct access can be a replacement access, which is sometimes necessary where national road realignment schemes affect existing developments (e.g. older residential properties) with no alternative available through a side road.</p> <p>PA-180 indicates that in such cases, the requirements of TII's updated standards will apply.</p> <p>It is considered that PA-180 would benefit from a clarification instead of omission.</p>
Adopted amendment	<p>In Section 33.9.1 Access onto national roads, modify the first paragraph under the heading Sight distances for access onto national roads as follows:</p> <p>Where direct vehicular access onto national primary roads cannot be avoided, (such as situations arising from national road realignment schemes), a Departure from TII Publications Standards DN-GEO-03060 with justification shall be required, as provided for in Section 5.5. Direct</p>

PA-180

(Chapter 33 Development management standards, Section 33.9 Access onto national roads)

Accesses of DN-GEO-03060. In all cases, the number of accesses on to the national road should be minimised, either by consolidating them into a single access point, or connecting them to existing side roads.

The sight distances required for access onto national primary and secondary roads are set out in Table 33.8. The sight distances are measured from the access point to the near-side edge of the carriageway in accordance with the **Design Manual for Roads and Bridges** TII Publications Standards DN-GEO-03031 and DN-GEO-03060.

25.2 Draft Direction Item 2(c)

c. Delete the following text at section 33.9.1:

Where direct vehicular access onto national primary roads cannot be avoided (such as situations arising from national road realignment schemes), a Departure from TII Publications Standards DN-GEO-03060 with justification shall be required, as provided for in Section 5.5. Direct Accesses of DN-GEO-03060. In all cases, the number of accesses on to the national road should be minimised, either by consolidating them into a single access point, or connecting them to existing side roads. The sight distances required for access onto national primary and secondary roads are set out in Table 33.8. The sight distances are measured from the access point to the near-side edge of the carriageway in accordance with the TII Publications Standards DN-GEO-03031 and DN-GEO-03060.

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

25.3 Submissions relating to Item 2(c)

Two submissions have been received in relation to this item, both supporting the Draft Direction.

Submission 15 – Northern and Western Regional Assembly (extract)

<https://consult.sligococo.ie/en/submission/slg-c57-15>

The submission indicates that, in relation to Item 2(c) of the Draft Ministerial Direction, the Assembly, through RPO 6.5 of the RSES, supports maintaining the strategic capacity and safety of the national road network. No further comments are provided, but overall, the NWRA supports the Draft Direction.

Submission 18 – Transport Infrastructure Ireland (extract)

<https://consult.sligococo.ie/en/submission/slg-c57-18>

The TII reminds the Council that it had previously submitted observations (Submission 39 of 2 July 2024) on Section 33.9.1 of the Draft County Development Plan and again on the subsequent Proposed Amendment PA-180.

Those observations remain the position of TII, which supports the Draft Ministerial Direction relating to Section 33.9.1 of the Development Plan.

[Note: Submission 39 of 2 July 2024 indicated that “TII is concerned that the proposal to include Proposed Amendment ref. no. PA-180 conflicts with the foregoing provisions of the Draft Plan and Proposed Amendments and conflicts with the provisions of official policy included in Section 2.5 of the Section 28 Ministerial Guidelines ‘Spatial Planning and National Roads Guidelines for Planning Authorities’ (DoECLG, 2012)” and that “Proposed Amendment Ref. no. PA-180 does not promote a plan-led approach but appears to defer consideration of access to national roads to a case by case basis which is inappropriate and not in accordance with the DoECLG Guidelines.”]

25.4 Chief Executive’s recommendation on Item 2(b)(xvii)

The Proposed Amendment PA-180 was drafted after internal consultation with the Sligo Regional Design Office (SRDO), which is funded by the TII and tasked with the delivery of all national road improvement and realignment schemes in County Sligo, in accordance with the Transport Infrastructure Ireland (TII) Project Management Guidelines. The minor modifications (clarifications) to PA-180 were also drafted in consultation with the SRDO.

The amendment, which was adopted with the minor modification, quotes TII’s most up-to-date publications and standards, which – presumably – are not in conflict with the *Spatial Planning and National Roads Guidelines for Planning Authorities (2012)*.

Given that the SRDO will likely continue to apply the above-mentioned TII standards even in the absence of a mention in the Development Plan, **there is no objection to deleting most of the amending text, thereby reverting to the original text of Section 33.9.1 Access to national roads, as published in Draft Plan (October 2023), while retaining only the updated name of the TII publication.**

The deletion of the entire first paragraph under the heading **Sight distances for access on to national roads** in **Section 33.9.1** would go beyond the scope of the amendment, by removing details on required sight distances and the reference to Table 33.8 in the same Plan chapter.

Recommendation

In accordance with the Draft Direction, the following text should be deleted under the heading *Sight distances for access on to national roads* in Section 33.9.1 of the Development Plan:

Where direct vehicular access onto national primary roads cannot be avoided (such as situations arising from national road realignment schemes), a Departure from TII Publications Standards DN-GEO-03060 with justification shall be required, as provided for in Section 5.5. Direct Accesses of DN-GEO-03060. In all cases, the number of accesses on to the national road should be minimised, either by consolidating them into a single access point, or connecting them to existing side roads. The sight distances required for access onto national primary and secondary roads are set out in Table 33.8. The sight distances are measured from the access point to the near-side edge of the carriageway in accordance with the TII Publications Standards DN-GEO-03031 and DN-GEO-03060.

The following text should replace the deleted text under the heading *Sight distances for access on to national roads* in Section 33.9.1 of the Development Plan:

The sight distances required for access onto national primary and secondary roads are set out in Table 33.8. The sight distances are measured from the access point to the near-side edge of the carriageway in accordance with TII Publications Standards DN-GEO-03031 and DN-GEO-03060.

APPENDIX 1

List of persons and organisations that made submissions on the Draft Ministerial Direction regarding Sligo CDP 2024-2030

Ref. no.	Date received	Author of the submission	on behalf of (where applicable)	PAZ, location or Draft Direction item mentioned in submission
1	25 November	Geoff Hynes, Inspector, COMAH, Chemical Production & Storage (CCPS)	Health and Safety Authority (HSA)	none
2	27 November	Tom Cafferkey	n/a	PAZ-57, Strandhill
3	27 November	John Bohan	n/a	No specific PAZ, Strandhill
4	28 November	Francis Clancy	n/a	PAZ-57, PAZ-58, Strandhill
5	28 November	Marian Dunleavy	n/a	PAZ-57, PAZ-58, Strandhill
6	29 November	Ronan Keane	n/a	PAZ-57, PAZ-58, Strandhill
7	2 December	Ken Russell	n/a	PAZ-57, PAZ-58, Strandhill
8	3 December	Eileen O'Connor	n/a	No specific PAZ, Strandhill
9	3 December	Peter Mahoney	n/a	PAZ-57, PAZ-58, Strandhill
10	3 December	Sinead O'Sullivan	n/a	PAZ-57, PAZ-58, Strandhill
11	3 December	John Sheridan	n/a	PAZ-57, PAZ-58, Strandhill
12	3 December	Regina O'Callaghan	n/a	PAZ-57, PAZ-58, Strandhill

Ref. no.	Date received	Author of the submission	on behalf of (where applicable)	PAZ, location or Draft Direction item mentioned in submission
13	3 December	Niamh McDermott	n/a	PAZ-57, PAZ-58, Strandhill
14	3 December	David Cullen	n/a	PAZ-57, PAZ-58, Strandhill
15	4 December	Denis Kelly, Director	Northern & Western Regional Assembly	All items of the Draft Direction
16	4 December	Laura Dunleavy	n/a	PAZ-57, PAZ-58, Strandhill
17	4 December	Aonghus Collins	n/a	PAZ-57, PAZ-58, Strandhill
18	4 December	Michael McCormack, Senior Land Use Planner	Transport Infrastructure Ireland (TII)	PAZ-41, PAZ-44 (Ballysadare), PA-180
19	5 December	Colin Reddington	n/a	PAZ-57, PAZ-58, Strandhill
20	5 December	Pádraig Meehan, Chairperson	Sligo Neolithic Landscapes Group	PAZ-11, PAZ-12, Cairns Hill (Sligo Town)
21	5 December	Tommy Lynch	n/a	PAZ-57, PAZ-58, Strandhill
22	5 December	Carah Doherty	n/a	PAZ-57, PAZ-58, Strandhill
23	5 December	Aine O'Donnell	n/a	PAZ-57, PAZ-58, Strandhill
24	6 December	Gavin Foley	n/a	PAZ-57, PAZ-58, Strandhill
25	6 December	Thomas MacDonald	n/a	PAZ-14, PAZ-15 (Hazelwood)
26	6 December	Thomas Macdonald	Beatrice Macdonald	PAZ-14, PAZ-15 (Hazelwood)
27	6 December	Alan O'Kelly	n/a	PAZ-57, PAZ-58, Strandhill
28	7 December	Luke Saunders	n/a	PAZ-57, PAZ-58, Strandhill
29	7 December	Peter Marron	n/a	PAZ-57, PAZ-58, Strandhill

Ref. no.	Date received	Author of the submission	on behalf of (where applicable)	PAZ, location or Draft Direction item mentioned in submission
30	7 December	Shane Neary	n/a	PAZ-57, PAZ-58, Strandhill
31	7 December	John Monahan	n/a	PAZ-57, PAZ-58, Strandhill
32	7 December	Niamh Gethin	n/a	PAZ-57, PAZ-58, Strandhill
33	7 December	Barry Carty	n/a	PAZ-57, PAZ-58, Strandhill
34	7 December	Aine Nic Amhlaidh	n/a	PAZ-56, PAZ-57, PAZ-58, Strandhill
35	8 December	Aine Nic Amhlaidh	n/a	PAZ-56 (Strandhill)
36	8 December	John Cox	n/a	No specific PAZ, Hazelwood
37	8 December	Strandhill Community Development Association	n/a	PAZ-57, PAZ-58, Strandhill
38	8 December	Edel Hackett	n/a	No specific PAZ, Hazelwood
39	8 December	Joe Gonley	n/a	PAZ-14, PAZ-15, Hazelwood
40	8 December	Mary Allen-Kiely	n/a	No specific PAZ (Strandhill)
41	8 December	Mary Keady	n/a	PAZ-57, PAZ-58, Strandhill
42	8 December	Pat Ryan	n/a	PAZ-57, PAZ-58, Strandhill
43	8 December	Cian Allen-Kiely	n/a	PAZ-57, PAZ-58, Strandhill
44	8 December	John Tuohy	n/a	PAZ-57, PAZ-58, Strandhill
45	8 December	Mary Quinn	n/a	PAZ-56, PAZ-57, PAZ-58, Strandhill
46	8 December	Michelle Butler	n/a	PAZ-57, PAZ-58, Strandhill
47	8 December	Adrian Hamilton	n/a	PAZ-56, Strandhill

Ref. no.	Date received	Author of the submission	on behalf of (where applicable)	PAZ, location or Draft Direction item mentioned in submission
48	9 December	Noel Kelly	n/a	No specific PAZ, Strandhill
49	9 December	Bernard Mulhern	n/a	PAZ-57, Strandhill
50	9 December	Patrick Coen	n/a	PAZ-14, PAZ-15 (Hazelwood)
51	9 December	Board of Management	Scoil Asicus Naofa, Strandhill	PAZ-57, PAZ-58, Strandhill
52	9 December	David Cummins	n/a	No specific PAZ, Hazelwood
53	9 December	Deirdre Norton	n/a	PAZ-14, PAZ-15 (Hazelwood)
54	9 December	Shane Carty	Carty Contractors	PAZ-41, Ballysadare
55	9 December	Daithí Hand	n/a	PAZ-14, PAZ-15 (Hazelwood)
56	9 December	David Collery	n/a	PAZ-14, PAZ-15, Hazelwood
57	9 December	Ann Marie Gavin	n/a	PAZ-41, Ballysadare
58	9 December	Karl Hannon	n/a	PAZ-41, Ballysadare
59	9 December	Brian Collery	n/a	PAZ-56, PAZ-57, PAZ-58, Strandhill
60	9 December	Michael Friel, Architect	Eunan Friel	PAZ-11, Tonaphubble (Sligo Town)
61	9 December	Darren Clancy, Design & Planning Consultant	Keith Carty	PAZ-63, Ballinafad
62	9 December	Hazel Feeney	Hazel and Jamie Feeney	PAZ-57, PAZ-58, Strandhill
63	9 December	Joan Swift	n/a	PAZ-11, PAZ-12 (Sligo Town)
64	9 December	Eileen Carty	n/a	PAZ-57, Strandhill

Ref. no.	Date received	Author of the submission	on behalf of (where applicable)	PAZ, location or Draft Direction item mentioned in submission
65	9 December	Robert Keran, RK Consulting	Beldare Homes	PAZ-45, Ballysadare
66	9 December	Carty Contractors	n/a	PAZ-57, Strandhill
67	9 December	Robert Keran, RK Consulting	Cathal O'Connor and David McMunn	PAZ-44, Ballysadare
68	9 December	Patrick Carty	n/a	PAZ-57, Strandhill
69	9 December	Karl Hannon	n/a	PAZ-57, Strandhill
70	9 December	Robert Keran, RK Consulting	Beldare Homes	PAZ-57, Strandhill
71	9 December	Robbie Henneberry	Strandhill Golf Club	PAZ-57, Strandhill
72	9 December	Robert Keran, RK Consulting	Beldare Homes	PAZ-12, Cairns Hill, Sligo Town
73	9 December	Elaine Heneghan Forward Planning Team, Asset Strategy	Uisce Éireann	PAZ-11, PAZ-14, PAZ-15, PAZ-31, PAZ-34, PAZ-45, PAZ-63, PAZ-76, PAZ-80
74	9 December	Kathleen Gallagher	n/a	PAZ-57, Strandhill
75	9 December	Ann Marie Gavin	n/a	PAZ-57, Strandhill
76	9 December	Niall Carty	n/a	PAZ-57, Strandhill
77	9 December	James Given, Lorraine Roe, Tim Murphy, Committee Members	Ocean Links Residents Association	PAZ-57, Strandhill
78	9 December	Ronan Smyth	n/a	PAZ-57, PAZ-58, Strandhill
79	9 December	Robert Keran, RK Consulting	Beldare Homes	PAZ-14, PAZ-15, Hazelwood, Sligo Town
80	9 December	Valerie Robinson	n/a	PAZ-57, Strandhill
81	9 December	Carol Gallagher	n/a	PAZ-57, Strandhill

Ref. no.	Date received	Author of the submission	on behalf of (where applicable)	PAZ, location or Draft Direction item mentioned in submission
82	9 December	Robert Keran, RK Consulting	Beldare Homes	PAZ-12, PAZ-14, PAZ-15, PAZ-44, PAZ-24, PAZ-57
83	9 December	Henrietta Veale	n/a	PAZ-56, Strandhill
84	9 December	Chris Gonley	n/a	No specific PAZ, Hazelwood
85	9 December	Mark Kelly	n/a	PAZ-57, Strandhill PAZ 14, PAZ-15, Hazelwood
86	9 December	David McMunn	n/a	PAZ-57, Strandhill
87	9 December	Barry White	n/a	PAZ-14, PAZ-15, Hazelwood
88	9 December	David McMunn	Stephen Taheny	PAZ-57, Strandhill
89	9 December	Erin Regan	n/a	PAZ-57, Strandhill PAZ 14, PAZ-15, Hazelwood
90	9 December	John Monahan	n/a	PAZ-56, Strandhill
91	9 December	Martina Keenan Rivero, McCutcheon Halley Chartered Planning Consultants	Margaret and Walter Burke	PAZ-13, Sligo Town
92	9 December	Kelly Energy and Engineering Services	n/a	PAZ-57, Strandhill PAZ 14, PAZ-15, Hazelwood
93	9 December	Barry White	n/a	PAZ-57, Strandhill
94	9 December	Ronan Gray	n/a	PAZ-57, Strandhill PAZ 14, PAZ-15, Hazelwood
95	9 December	Eve Regan	Ann McConnon	PAZ-57, Strandhill PAZ 14, PAZ-15, Hazelwood
96	9 December	Eugene Flynn	n/a	PAZ-11, PAZ-12, Cairns Hill (Sligo Town)
97	9 December	Mark Kelly	Margaret Malarney	PAZ-57, Strandhill PAZ 14, PAZ-15, Hazelwood
98	9 December	Barry White	n/a	PAZ 57, Strandhill

Ref. no.	Date received	Author of the submission	on behalf of (where applicable)	PAZ, location or Draft Direction item mentioned in submission
99	9 December	Rachel Byrne	n/a	PAZ-57, Strandhill PAZ 14, PAZ-15, Hazelwood
100	9 December	Mark Kelly	Rory Kelly	PAZ-57, Strandhill PAZ 14, PAZ-15, Hazelwood
101	9 December	Gaven Heeran	n/a	PAZ-57, Strandhill PAZ 14, PAZ-15, Hazelwood
102	9 December	Helen Connaughton	n/a	PAZ-57, Strandhill PAZ 14, PAZ-15, Hazelwood
103	9 December	Erin Regan	Paddy Flynn	PAZ-57, Strandhill PAZ 14, PAZ-15, Hazelwood
104	9 December	David McMunn	Peter Clarke	PAZ-57, Strandhill PAZ 14, PAZ-15, Hazelwood
105	9 December	Saoirse Faughnan	n/a	PAZ-14, PAZ-15 (Sligo Town)
106	9 December	Erin Regan	Thomas Regan	PAZ-57 (Strandhill), PAZ-14, PAZ-15 (Hazelwood)
107	9 December	Declan Mc Cabe, McCabe Architects	Brendan and Aidan Gregory Feeney	Enniscrone (PAZ-34)
108	9 December	Michael Conmy, Bury Architects	Bernard Fox	PAZ-33, Enniscrone
109	9 December	Michael Conmy, Bury Architects	Blackmud Developments Ltd.	PAZ-9, Farranacardy (Sligo Town)
110	9 December	Aine Nic Amhlaidh	n/a	PAZ-57, Strandhill
111	9 December	Michael Conmy, Bury Architects	Fergal Cawley	PAZ-31, Bartragh (Enniscrone)
112	9 December	Aine Nic Amhlaidh	Owen McKirdy	PAZ-56, Strandhill
113	9 December	Aine Nic Amhlaidh	Arianna McKirdy	PAZ-56, Strandhill

APPENDIX 2

Detailed summaries of submissions and observations
received during public consultation
on the Draft Ministerial Direction

Submission 1

<https://consult.sligococo.ie/en/submission/slq-c57-1>

Author: [HSA](#) (Health and Safety Authority)

The content of the submission made by the Health and Safety Authority is nearly identical to that of the Authority's previous submissions (Submission 1 of 5 October 2023, relating to the Draft Plan, and Submission 2 of 12 June 2024, relating to the Proposed Amendments).

The Health and Safety Authority reiterates its request for the "planning guidelines" to contain the following:

- indication of planning policy in relation to major accident hazard sites notified under the regulations, which reflects the intentions of Article 13 of Directive 2012/18/EU ;
- consultation distances and generic advice, where applicable, including maps showing such distances;
- policy on the siting of new major hazard establishments;
- mention of Lough Gill Distillery Ltd, a "notified establishment"

The submission includes a "Note on the Approach of the HSA to the Provision of Land-use Planning advice" with a link to a guidance document,

http://www.hsa.ie/eng/Your_Industry/Chemicals/COMAH/Land_Use_Planning/

As the HSA observations do not relate to any item of the Draft Ministerial Direction, the submission is not mentioned in any other section of this Report.

Submission 2

<https://consult.sligococo.ie/en/submission/slg-c57-2>

Author: [Tom Cafferkey](#)

- The submission suggests that most of the “*rezoning objectives*” in Strandhill village, specifically PAZ-57 and PAZ-58, do not present an overall strategy for the proper planning and sustainable development of the village.
- The submission welcomes the intervention of the Office of the Planning Regulator and the Minister of State for Local Government on PAZ-57.
- The author urges the Chief Planner and the Chief Executive of Sligo County Council to seek further direction from the Minister for Local Government regarding the “*removal of zoning objective PAZ-58*” from the Sligo County Development Plan 2024-2030, for the reasons outlined above.
- Strandhill requires a comprehensive masterplan that promotes integrated thinking rather than disparate individual land-use plans that may cater only to vested interests, potentially neglecting community needs and the principles of proper planning and sustainable development.
- In order to get the best outcome, Sligo County Council should engage with the community “*to collaboratively master plan the future of the village*”.

Submission 3

<https://consult.sligococo.ie/en/submission/slg-c57-3>

Author: [John Bohan](#)

This submission does not refer specifically to PAZ-57 but expresses concerns regarding the increase in the number of dwellings in Strandhill.

The submission notes the Development Plan strategy to “*carefully manage development, prioritising the provision of adequate service infrastructure, recreational and community facilities*” in Strandhill, but also that the village’s infrastructure and amenities “*are now at maximum capacity*”.

The Draft Plan zoning had the potential to increase housing numbers by up to 30%, impacting on infrastructure, amenities and the environment. The “*November 2024 revised density ranges*” could potentially lead to a 50% increase in the number of dwellings and residents.

In order to avoid “*hugely disruptive growth*”, the submission recommends that the Council should undertake an in-depth review of the potential impact of additional housing on the local community and should allocate funding for necessary upgrades in advance of any further development.

Submission 4

<https://consult.sligococo.ie/en/submission/slg-c57-4>

Author: [Francis Clancy](#)

The main points of the submission are as follows:

- The decisions which the elected members sought to make, such as PAZ-57 and PAZ-58, displayed a complete lack of awareness of what is actually zoned at present and what the village of Strandhill village actually needs, and would result in the village being developed far beyond what is required, in a manner which is completely unsustainable.
- There is a large quantum of land already rezoned for development within the village. Further land should not be rezoned for the moment.
- Rather than continuing to rezone in the hope that development occurs, the owners of currently zoned land should be *“made to commence development or lose the rezoning”*.
- The Chief Planner and the Chief Executive of Sligo County Council are urged to seek further direction from the Minister for Local Government regarding the *“removal of planning objective PAZ 58 from the Sligo County Development Plan 2024-2030”*, due to large volume of land already rezoned.
- Strandhill requires transparent, open dialogue with both local and national government bodies, to draft a comprehensive masterplan for the village and its hinterland, to protect its environment for the benefit of visitors and residents.

Submission 5

<https://consult.sligococo.ie/en/submission/slg-c57-5>

Author: [Marian Dunleavy](#)

This submission notes that the Draft Ministerial Direction relates to over 20 zoning objectives and may result in the “removal” of approximately 70 hectares.

The main points of the submission are as follows:

- The majority of the rezoning objectives in Strandhill village, specifically PAZ 57 and PAZ 58, *“do not present an overall strategy for the proper planning and sustainable development of the village. It is difficult to conceive of a less effective approach to developing the village plan than what transpired at the special council meeting on September 30th”*.
- The intervention of the Office of the Planning Regulator and the Minister of State for Local Government is welcome.
- The Council’s Chief Planner and the Chief Executive are requested to *“seek further direction from the Minister for Local Government regarding the removal of planning objective PAZ 58 from the Sligo County Development Plan 2024-2030, due to large volume of land already rezoned”*.
- Strandhill requires a comprehensive masterplan that promotes *“integrated thinking rather than disparate individual land use plans that may cater only to vested interests, potentially neglecting community needs and the principles of proper planning and sustainable development”*.
- Sligo County Council is *“encouraged”* to engage with the community to *“collaboratively master plan the future of the village”*.

Submission 6

<https://consult.sligococo.ie/en/submission/slg-c57-6>

Author: [Ronan Keane](#)

This submission notes the Core Strategy of the Draft Sligo County Development Plan, which states that the Plan will aim *'to carefully manage development, prioritising the provision of adequate service infrastructure, recreational and community facilities'* in satellite villages such as Strandhill

The main points made in this submission are as follows:

- The decisions made by the elected members of Sligo County Council on 30th of September to include PAZ-57 and PAZ-58 *"back into the Draft County Development Plan for rezoning as new residential does not support this stated aim at all"*.
- There are sufficient lands zoned within the Strandhill area in the existing County Development Plan.
- Rezoning additional lands without consideration for proper planning and sustainable development *"is repeating the same mistakes that were made in the past around Ireland and does not have Strandhill village interests at heart"*.
- Before any additional lands are zoned for development in Strandhill, there needs to be a comprehensive masterplan driven by Sligo County Council with community engagement.
- Strandhill *"desperately needs community recreational facilities including playing fields open to all, and a community centre with indoor playing facilities as a central village hub"*.
- The Sligo Chief Executive and Chief Planner are urged to *"seek further direction from the Minister for Local Government regarding the removal of planning objective PAZ 58 from the Sligo County Development Plan 2024-2030, due to large volume of land already zoned in Strandhill"*.

Submission 7

<https://consult.sligococo.ie/en/submission/slg-c57-7>

Author: [Ken Russell](#)

This submission notes that the Draft Ministerial Direction relates to over 20 zoning objectives and may result in the “removal” of approximately 70 hectares.

Most of the rezoning objectives for Strandhill village, particularly PAZ 57 and PAZ 58, fail to provide a cohesive strategy for the proper planning and sustainable development of the area.

The intervention of the Office of the Planning Regulator and the Minister of State for Local Government is positive.

The submission requests the Council’s Chief Planner and the Chief Executive to “*seek further direction from the Minister for Local Government regarding the removal of planning objective PAZ 58 from the Sligo County Development Plan 2024-2030, due to large volume of land already rezoned*”.

It is also suggested that Strandhill requires a “*well-thought-out master plan that fosters integrated development rather than fragmented individual land use plans that risk serving vested interests at the expense of community needs and sound planning principles*”.

Sligo County Council is encouraged “*to actively engage with the community to collaboratively shape a master plan for the future of Strandhill village*”.

Submission 8

<https://consult.sligococo.ie/en/submission/slg-c57-8>

Author: [Eileen O'Connor](#)

The submission objects to the “*volume and design of houses on Golf Club Road and Airport Road*”, in Strandhill.

Submission 9

<https://consult.sligococo.ie/en/submission/slg-c57-9>

Author: [Peter Mahoney](#)

The submission notes that the Draft Ministerial Direction relates to over 20 zoning objectives and may result in the “removal” of approximately 70 hectares.

The main points of the submission are as follows:

- Many rezoning objectives, particularly PAZ 57 and PAZ 58, lack a coherent strategy for proper planning and sustainable development.
- The approach taken during the special council meeting on September 30th appears to have been fragmented and insufficient.
- The intervention of the Office of the Planning Regulator and the Minister of State for Local Government is welcome.
- The Council’s Chief Planner and the Chief Executive are requested to “*seek further direction from the Minister for Local Government regarding the removal of planning objective PAZ 58 from the Sligo County Development Plan 2024-2030, due to large volume of land already rezoned*”.
- Strandhill requires a holistic and integrated master plan that balances the needs of the community with sustainable development principles. Fragmented or individualistic planning efforts risk undermining the village’s potential and could fail to address the broader public interest.
- Sligo County Council is urged to prioritize the development of a collaborative masterplan for Strandhill, actively engaging with the local community to shape a shared vision for its future.

Submission 10

<https://consult.sligococo.ie/en/submission/slg-c57-10>

Author: [Sinead O Sullivan](#)

This submission notes the Draft Ministerial Direction regarding certain measures for the Sligo County Development Plan 2024-2030.

The main points of the submission are as follows:

- The decision by Sligo County Council members to rezone PAZ-57 and PAZ-58 from Strategic Land Reserve to New Residential uses *“displays a lack of awareness of lands that are already zoned for development in Strandhill village, and what the village of Strandhill actually needs”*.
- The intervention of the Office of the Planning Regulator and the Minister of State for Local Government on PAZ-57 is welcomed.
- There needs to be a comprehensive masterplan for Strandhill, led by Sligo County Council with community engagement as well as local and national government bodies, *“to build an integrated plan and sustainable development for an expanding village”*.

Submission 11

<https://consult.sligococo.ie/en/submission/slg-c57-11>

Author: [John Sheridan](#)

This submission notes that the Draft Direction *“affects over 20 zoning objectives in the draft County Development Plan, resulting in the removal of approximately 70 hectares”*.

The main points of the submission are as follows:

- The majority of the rezoning objectives in Strandhill village, specifically PAZ-57 and PAZ-58, *“do not present an overall strategy for the proper planning and sustainable development of the village”*.
- The intervention of the Office of the Planning Regulator and the Minister of State for Local Government is welcomed.
- The Chief Planner of Sligo County Council and the Chief Executive are *“urged to seek further direction from the Minister for Local Government regarding the removal of planning objective PAZ-58 from the Sligo County Development Plan 2024-2030”*.
- Strandhill requires a comprehensive masterplan that promotes integrated thinking rather than *“disparate individual land use plans that may cater only to vested interests, potentially neglecting community needs and the principles of proper planning and sustainable development”*.
- Sligo County Council is encouraged to engage with the community to *“collaboratively master plan the future of the village”*.

Submission 12

<https://consult.sligococo.ie/en/submission/slg-c57-12>

Author: [Regina O'Callaghan](#)

This submission notes that the Draft Direction affects over 20 zoning objectives in the draft County Development Plan, resulting in the “*removal*” of approximately 70 hectares.

The main points of the submission are as follows:

- The majority of the rezoning objectives in Strandhill village, specifically PAZ-57 and PAZ-58, do not present an overall strategy for the proper planning and sustainable development of the village.
- The Chief Planner and the Chief Executive of Sligo County Council are urged “*to seek further direction from the Minister for Local Government regarding the removal of planning objective PAZ 58 from the Sligo County Development Plan 2024-2030*”.
- Strandhill would benefit from a holistic masterplan that integrates housing, infrastructure, environmental conservation, and community facilities. Such a plan should be developed in collaboration with local residents and stakeholders. to reflect the community’s vision for the future.

Submission 13

<https://consult.sligococo.ie/en/submission/slg-c57-13>

Author: [Niamh McDermott](#)

This submission notes that the Minister of State for Local Government and Planning gave notice of his intention to issue a direction to Sligo County Council regarding certain measures for the Sligo County Development Plan 2024-2030. The Draft Direction affects over 20 zoning objectives in the draft County Development Plan, resulting in the removal of approximately 70 hectares.

The main points of the submission are summarised below as follows:

- The majority of the rezoning objectives in Strandhill village, specifically PAZ-57 and PAZ-58, do not present an overall strategy for the proper planning and sustainable development of the village.
- The intervention of the Office of the Planning Regulator and the Minister of State for Local Government on zoning objective PAZ-57 is welcome.
- The Chief Planner and the Chief Executive of Sligo County Council are urged to *“seek further direction from the Minister for Local Government regarding the removal of planning objective PAZ-58 from the Sligo County Development Plan 2024-2030”*.
- Strandhill requires a comprehensive masterplan that promotes integrated thinking rather than disparate individual land use plans that may cater only to vested interests, potentially neglecting community needs and the principles of proper planning and sustainable development.
- Sligo County Council is *“encouraged”* to engage with the community to *“collaboratively master plan the future of the village”*.

Submission 14

<https://consult.sligococo.ie/en/submission/slg-c57-14>

Author: [David Cullen](#)

This submission notes that the Minister of State for Local Government and Planning gave notice of his intention to issue a direction to Sligo County Council regarding certain measures for the Sligo County Development Plan 2024-2030. The Draft Direction affects over 20 zoning objectives in the draft County Development Plan, resulting in the removal of approximately 70 hectares.

The main points of the submission are summarised below as follows:

- The majority of the rezoning objectives in Strandhill village, specifically PAZ-57 and PAZ-58, *“do not present an overall strategy for the proper planning and sustainable development of the village”*.
- The intervention of the Office of the Planning Regulator and the Minister of State for Local Government is welcome.
- The Chief Planner and the Chief Executive of Sligo County Council are urged to *“seek further direction from the Minister for Local Government regarding the removal of planning objective PAZ 58 from the Sligo County Development Plan 2024-2030”*.
- The zoning of further land for Residential development, as envisaged in PAZ-58, is premature pending the outcome of the EPA review the Strandhill Wastewater Discharge Licence, a process which commenced in September 2024.
- Strandhill requires a comprehensive masterplan that promotes *“integrated thinking rather than disparate individual land use plans that may cater only to vested interests, potentially neglecting community needs and the principles of proper planning and sustainable development”*.
- Sligo County Council is encouraged to engage with the community to *“collaboratively master plan the future of the village”*.

Submission 15

<https://consult.sligococo.ie/en/submission/slg-c57-15>

Author: [Northern and Western Regional Assembly](#)

The submission briefly recounts the recent stages in the preparation and adoption of the Sligo County Development Plan 2024-2030 including the Assembly's previous three submissions made during the Plan review process (at pre-draft stage, Draft Plan stage and Proposed Amendments stage).

After setting out the full content of the Draft Ministerial Direction, including the Statement of Reasons, the submission outlines the NWRA's assessment of the Draft Direction.

It notes that the Assembly, in its submission on the proposed Material Alterations (dated 05 July 2024), did not support Material Amendments now contained in Items 2(b)(i)–(vi) of the Draft Direction, i.e. PAZ-9, PAZ-11, PAZ-12, PAZ-13, PAZ-14 and PAZ-15).

Relevant extracts from the Assembly's submission are set out below:

- *There are 16 zoning amendments to the Sligo Town Zoning Plan, 7 of which merit consideration due to the role of Sligo as a Regional Growth Centre as per RSES and NPF.*
- *The proposed amendments in PAZ 9 and PAZ 11-15 represent significant amendments to the Sligo Town Plan that would constitute an increase of approximately 66.87 ha of nRES (New Residential) zoned land, primarily at the periphery of the plan area or outside the plan area.*
- *This increase would represent a 75% increase in the overall Residential Zoning allocation for the Sligo Town Plan area, as per current Core Strategy allocation.*
- *However, these Proposed Amendments provide for approximately 66 ha of additional nRES New Residential Zoning landbank (as proposed under PAZ-9-15). These proposed additional lands would generate between 2,500 and 3,000 additional residential units at the density of 35-50 dwelling units per hectare as required for Regional Growth Centres in the Sustainable and Compact Settlements, Guidelines for Planning Authorities. This would provide for a population increase of approximately 6,000 – 7,000 people.*
- *This additional zoning does not appear to be realistic nor reasoned, based on the current demographic growth trajectory of Sligo Town, with the Town currently delivering approximately 30% of the housing / population ambition set out in the RSES, which is borne out in the highlighted statistics around housing completions, and which is commented upon in the concluding comments of the RSES 2 Year Monitoring & Implementation Report (published by the Assembly in 2022).*
- *This approach is not supported by the Assembly on the following grounds:*
 - *It is inconsistent with the Core Strategy of the Draft Plan and an appropriate rationale has not been provided, contrary to the provisions of the Development Plan Guidelines for Planning Authorities, 2022.*
 - *The additional zonings are not supported by an evidence-based approach, and are peripheral in nature, with 36ha. of proposed zoning nRES outside the current Sligo Town Boundary and negating the objective to deliver compact settlements of scale as set out in the RSES. The proposed Amendments fail to apply the sequential approach to development to support the sustainable compact growth of the town and its environs.*
 - *PAZ 13 represents 27.08 ha rezoning of SLR (Strategic Land Reserve) to nRSES, which although within the Town Boundary, is considered peripheral to the town built up area and*

would constitute leapfrogging and contrary to the objective to deliver compact development.

- *The proposed amendments represent a significant departure from the RSES RPOs for Sligo Town and in particular RPO 3.7.37, which sets an ambition for Sligo to grow to a population of 27,200 by 2040.*
- *The implication of the Proposed Amendments has not been clearly considered within the context of the Local Transport Plan. They do not support the principle of delivering integrated land use and transport planning that will enable increased travel by sustainable transport modes and a reduction in in greenhouse gas emissions.*

The Assembly's position on these matters has not changed.

The NWRA indicates that, in its submission dated 05 July 2024, the Regional Assembly did not address zoning amendments for lands located outside the Regional Growth Centre, i.e. Sligo Town.

Therefore, the submission does not contain specific comments on Items 2 a(i) and 2 b(vii)-(xx) (i.e. PAZ-31, PAZ-32, PAZ-33, PAZ-34, PAZ-41, PAZ-42, PAZ-44, PAZ-45, PAZ-57, PAZ-61, PAZ-63, PAZ-76, PAZ-79, PAZ-80) of the Draft Ministerial Direction.

However, the Assembly reiterates its support for the concept of developing places of regional-scale and compact urban growth as outlined in the Regional Spatial and Economic Strategy and in particular Regional Policy Objectives RPO 3.1, RPO 3.2(b), RPO 3.2 (c), RPO 3.3, RPO 3.4 and RPO 3.7.39 – along with ensuring prevention of flooding/flood risk through RPO 3.10. These principles were included in previous submissions to the plan-making process.

Considering the cumulative impact of the zonings referred to in Items 2(a)(i) and 2(b)(i)-(xx), the Assembly fully supports the Draft Ministerial Direction.

In relation to Item 2(c) of the Draft Direction (“delete Section 33.9.1”) the Assembly, through RPO 6.5 of the RSES, supports maintaining the strategic capacity and safety of the national road network.

The Conclusion of the submission is that “the Assembly supports the draft Ministerial Direction. This will strengthen compliance of the Sligo County Development Plan 2024-2030 with the Regional Spatial and Economic Strategy for the Northern and Western Region 2020-2032.”

The Appendix lists the full text of RPOs 3.1, 3.2(b), 3.2(c), 3.3, 3.4, 3.7.39, 3.10 and 6.5.

Director's Cover Letter

The submission is accompanied by a Cover Letter (signed by Denis Kelly, Director), which indicates that the elected members of the Northern and Western Regional Assembly considered the Report (i.e. the above submission) at their monthly meeting on 15 November 2024.

The following advice is included:

“Following careful review, the elected members resolved to accept the report and to make the submission as outlined, subject to advising that Sligo County Council and the Minister ensure that population and housing figures in the finalised plan are clearly and accurately transposed. This is considered essential to safeguard the robustness and integrity of the County Development Plan.”

Submission 16

<https://consult.sligococo.ie/en/submission/slg-c57-16>

Author: [Laura Dunleavy](#)

This submission notes that the Minister of State for Local Government and Planning gave notice of his intention to issue a direction to Sligo County Council regarding certain measures for the Sligo County Development Plan 2024-2030. The Draft Direction affects over 20 zoning objectives in the draft County Development Plan, resulting in the removal of approximately 70 hectares *"erroneously added by the elected members of Sligo County Council, who went against the best advice of the council executives and the OPR"*.

The main points of the submission are summarised below as follows:

- The majority of the rezoning objectives in Strandhill village, specifically PAZ-57 and PAZ58, *"do not present an overall strategy for the proper planning and sustainable development of the village"*.
- The intervention of the Office of the Planning Regulator and the Minister of State for Local Government is welcome.
- The Chief Planner and the Chief Executive of Sligo County Council are urged to *"seek further direction from the Minister for Local Government regarding the removal of planning objective PAZ 58 from the Sligo County Development Plan 2024-2030"*.
- Strandhill requires a comprehensive masterplan that promotes *"integrated thinking rather than disparate individual land use plans that cater only to vested interests, potentially neglecting community needs and the principles of proper planning and sustainable development"*.
- Sligo County Council is *"encouraged"* to engage with the community to *"collaboratively master plan the future of the village"*.

Submission 17

<https://consult.sligococo.ie/en/submission/slg-c57-17>

Author: [Aonghus Collins](#)

This submission notes that the Minister of State for Local Government and Planning gave notice of his intention to issue a direction to Sligo County Council regarding certain measures for the Sligo County Development Plan 2024-2030.

The main points of the submission are as follows:

- The Core Strategy of the Draft Sligo County Development Plan states that the plan will aim 'to carefully manage development, prioritising the provision of adequate service infrastructure, recreational and community facilities' in satellite villages of which Strandhill is included.
- The decisions made by the elected members of Sligo County Council on 30th of September to "include 2 additional sites PAZ-57 and PAZ-58 back into the Draft County Development Plan for rezoning as new residential was extremely disappointing and does not support this stated aim at all".
- There are sufficient lands zoned within the Strandhill area in the existing County Development plan, (6.46 hectares) that can be developed. Rezoning additional lands, up to 8.44 hectares, without consideration for proper planning and sustainable development, "is repeating the same mistakes that were made in the past around Ireland, and does not have Strandhill village's interests at heart".
- Before any additional lands are zoned for development in Strandhill, there needs to be a comprehensive masterplan driven by Sligo County Council, with community engagement as well as local and national government bodies, to "build an integrated plan and sustainable development for an expanding village".
- This masterplan needs to include plans for existing and future support services, infrastructure, community development needs, local amenities, schools and shops, environmental issues of wildlife, beach and sea-shore protection, sand dune protection and management, coastal erosion mitigation and wastewater treatment management.
- Strandhill "desperately needs community recreational facilities including playing fields open to all, and a community centre with indoor playing facilities as a central village hub".
- The Sligo Chief Executive and Chief Planner are urged to "seek further direction from the Minister for Local Government regarding the removal of planning objectives PAZ-57 and PAZ-58 from the Sligo County Development Plan 2024-2030, due to large volume of land already zoned in Strandhill".

Submission 18

<https://consult.sligococo.ie/en/submission/slg-c57-18>

Author: [Transport Infrastructure Ireland \(TII\)](#)

TII notes the contents of the Draft Ministerial Direction and makes several observations, relating to:

- PA-180 – amendment to Section 33.9.1 Access to national roads;
- PAZ-41, PAZ-44 and PAZ-46 – amendments to land use zoning in Ballysadare.

The Authority refers to its previous submissions (at Draft Plan and Proposed Amendments stages), indicating that its position remains unchanged.

Specifically, in relation to PA-180, the Authority wishes to confirm support for the Draft Ministerial Direction relating to Section 33.9.1 of the Development Plan.

In relation to PAZ-41, PAZ-44 and PAZ-46, TII's observations on the Proposed Amendments (made on 2 July 2024) identified the potential for *"policy conflict arising from the zoning of additional lands to the west of Ballysadare at a location alongside the N59, national road, where TII's records indicate an 80kph speed limit applies"*.

The Authority acknowledges that *"lands associated with PAZ-46 can be accessed within the 50-60 kph speed limit area and can be served by a vehicular access located in accordance with the Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012)"*, as indicated in the Third Chief Executive's Report. However, this is not the case for lands subject to PAZ-41 and PAZ-44.

The TII notes that "Proposed Amendment no. PAZ-41 and Proposed Amendment no. PAZ-44 were both adopted and included in the final Development Plan but are **not** subject to the Draft Ministerial Direction".

*[Note: presumably the word "not" in the above paragraph is a typographic error in the TII's submission, as both sites **are** subject to the Draft Ministerial Direction.]*

Having regard to the fact that *"access and intensification of access to the N59, national road, to the lands subject to Proposed Amendment no. PAZ-41 and Proposed Amendment no. PAZ-44 where TII's records indicate an 80kph speed limit applies conflicts with the provisions of Section 2.5 of the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities'"*, the TII advises the Council that the Authority's position remains as set out in July 2024.

Overall, TII supports the Draft Ministerial Direction.

Submission 19

<https://consult.sligococo.ie/en/submission/slg-c57-19>

Author: [Colin Reddington](#)

This submission notes that the Minister of State for Local Government and Planning gave notice of his intention to issue a direction to Sligo County Council regarding certain measures for the Sligo County Development Plan 2024-2030. The Minister's draft direction affects over 20 zoning objectives in the draft County Development Plan, resulting in the "removal" of approximately 70 hectares.

The main points of the submission are summarised below as follows:

- The majority of the rezoning objectives in Strandhill village, specifically PAZ-57 and PAZ-58, *"do not present an overall strategy for the proper planning and sustainable development of the village"*.
- The intervention of the Office of the Planning Regulator and the Minister of State for Local Government is welcome.
- The Chief Planner and the Chief Executive of Sligo County Council are urged to *"seek further direction from the Minister for Local Government regarding the removal of planning objective PAZ 58 from the Sligo County Development Plan 2024-2030"*.
- In September 2024, the EPA set a process in train to review the Strandhill Wastewater Discharge Licence. Zoning of further land for residential development, as envisaged in PAZ-58, is premature pending the outcome of this review.
- Strandhill requires a comprehensive masterplan that promotes *"integrated thinking rather than disparate individual land use plans that may cater only to vested interests, potentially neglecting community needs and the principles of proper planning and sustainable development"*.
- Sligo County Council is *"encouraged"* to engage with the community to *"collaboratively master plan the future of the village"*.

Submission 20

<https://consult.sligococo.ie/en/submission/slg-c57-20>

Author: [Sligo Neolithic Landscapes Group](#)

The Sligo Neolithic Landscapes Group welcomes the Draft Direction, which *"is in line with a recommendation made by the Office of the Planning Regulator (OPR) on the 27th of October 2024"*. The Group supports the draft Ministerial Direction in relation to PAZ-11 and PAZ-12.

The submission refers to the proposal to rezone PAZ-11 (Tonaphubble) and PAZ-12 (Cairns Hill) from GB (Green Belt) to nRES. It indicates that:

- Such a rezoning would have a negative impact on Recorded Monuments SL014-133 (Ringfort) and Recorded Monuments SL014-23 and SL014-232 (Cairns), and the immediate landscape context of these sites.
- Submissions made by OPR, DHLGH and Northern & Western Regional Assembly (NWRA) do not support the proposed rezoning from GB to nRES.
- The Group concurs with the view that *"development on these lands would have a substantial, negative impact on the integrity of the landscape of archaeological significance and would undermine the Council's application for the designation of 'The Passage Tomb Landscape of County Sligo' as a UNESCO World Heritage Site"*.
- The benefits of full World Heritage Status for the Passage Tomb Landscape of County Sligo would be immense for the area, in respect of preserving our heritage, providing an amenity for residents, and for education as well as promoting the area for visitors.
- Fáilte Ireland's objection to planning application 08/886 (2008) recognised that *"...Sligo's tourism is linked to its landscape, cultural heritage and environmental quality. The passage tombs in the vicinity of the development site represent significant amenity resources ... The passage tombs and associated lands at Cairns Hill have the potential to be developed (as) cultural and environmental resources that would be of benefit to local and visitor alike"*.
- The original Green Belt designation around the Tonaphubble and Cairns Hill area is welcomed by the Group, given the importance of this area to the application for the designation of 'The Passage Tomb Landscape of County Sligo' as a UNESCO World Heritage Site.
- The cairns on Cairns Hill - along with the small passage tomb at Abbeyquarter North - constitute the only element of the WHS bid found today close to an urban setting. They maintain the strong connection from the town to the ancient sites through line of sight and landscape character.
- The two large cairns on Cairns Hill form an essential part of the ritual Sligo Neolithic landscape, and are one of six areas of monument clusters included in the bid.
- The northern section of the 'dual centres' of Carrowmore and Carrowkeel is set on and around the Cúil Iorra peninsula, and contains four monument clusters, at Carrowmore, Knocknarea, the Ballygawley Mountains and Cairns Hill.
- Intervisibility between the western cairn at Cairns Hill (SL014-231) and the other elements of the passage tomb complex at Carrowmore and Knocknarea is an important feature of the setting of these monuments. Rezoning in the immediate shadow of the monuments would permit an objectionable visual intrusion and negative impact on the overall amenity and integrity of the great cairns at Cairns Hill.

- The proposed rezoning would have a negative effect on the landscape character of Cairns Hill and on the setting of the cairns, which are of immense cultural and aesthetic value and constitute a core part of the World Heritage Bid for the Passage Tomb Landscape of County Sligo.
- There were previous refusals of planning permission at (or adjacent to) both these locations, based on archaeological rationale (submissions were made by the Department of the Environment, Heritage and Local Government to this effect in 2008) and also tourism (Fáilte Ireland made a submission in 2008).
- PAZ-11 is located directly adjacent to Planning Application 08/70118 (refused in 2009).
- PAZ-11 is at a higher elevation and closer to SL014-133 (Ringfort) and cairns SL014-23 and SL014-232.
- PAZ-12 lies within the boundary of Planning Application: 08/886 (also refused in 2009).
- Sligo County Councillors had previously voted to remove a proposed link road (T2.11, which traversed these lands) from the Sligo Environs Development Plan, operational at the time. The land was considered unsuitable for development due to its location.
- These decisions were made *before* the proximate archaeological sites were included on Ireland's tentative list for World Heritage, and before their greater national and international recognition. The need to actively protect these treasures of our heritage is no less pressing today than it was in 2009.

Submission 21

<https://consult.sligococo.ie/en/submission/slg-c57-21>

Author: [Tommy Lynch](#)

This submission expresses significant concerns regarding the capacity of the existing wastewater and drainage infrastructure in Strandhill, having regard to “*proposed residential developments in PAZ 57 and PAZ 58*”.

The main points of the submission are as follows:

- Despite the recent upgrade of the Strandhill Wastewater Treatment Plant to a capacity of 3,700 PE, the supporting sewer network may not accommodate the increased load from these developments.
- Evidence of high-volume, fast-flowing drainage through residential areas during dry weather indicates that the system is already operating near its limit and suggests potential inadequacies in stormwater management.
- Approving additional residential projects without first addressing these infrastructural constraints could lead to overloading, resulting in environmental hazards and public health risks.
- It is imperative that any further development in these zones be contingent upon comprehensive assessments and necessary upgrades to the wastewater and drainage systems to ensure they can sustainably support increased demand.

Submission 22

<https://consult.sligococo.ie/en/submission/slg-c57-22>

Author: [Carah Doherty](#)

This submission notes that Draft Direction affects *“over 20 zoning objectives in the draft County Development Plan”*, resulting in the *“removal of approximately 70 hectares erroneously added by the elected members of Sligo County Council, who went against the best advice of the council executives and the OPR”*.

The main points of the submission are summarised below as follows:

- The majority of the rezoning objectives in Strandhill village, specifically PAZ 57 and PAZ 58, *“do not present an overall strategy for the proper planning and sustainable development of the village”*.
- The intervention of the Office of the Planning Regulator and the Minister of State for Local Government is welcome.
- The Chief Planner and the Chief Executive of Sligo County Council are urged to *“seek further direction from the Minister for Local Government regarding the removal of planning objective PAZ 58 from the Sligo County Development Plan 2024-2030”*.
- Strandhill requires a comprehensive masterplan that promotes *“integrated thinking rather than disparate individual land use plans that cater only to vested interests, potentially neglecting community needs and the principles of proper planning and sustainable development”*.
- Sligo County Council is *“encouraged”* to engage with the community to *“collaboratively master plan the future of the village”*.

Submission 23

<https://consult.sligococo.ie/en/submission/slg-c57-23>

Author: [Aine O'Donnell](#)

The author is a resident of Strandhill and a parent of three children attending Strandhill National School. She is writing to express her concerns regarding the Sligo County Development Plan 2024-2030, particularly the inclusion of additional zoning objectives PAZ-57 and PAZ-58 in the Draft Development Plan.

The main points of the submission are as follows:

- The Draft Development Plan's stated aim to "carefully manage development, prioritising the provision of adequate service infrastructure, recreational and community facilities" in villages like Strandhill is undermined by the elected members' decision on September 30th to rezone an additional 8.44 hectares of land (PAZ-57 and PAZ-58) for residential use.
- Strandhill already has 6.46 hectares of zoned land, sufficient to accommodate 141-258 new homes (353-646 residents) as outlined in the original plan. This additional rezoning is unnecessary, premature, and puts the long-term sustainable development of the village at risk.
- **Overburdening of local infrastructure:** Strandhill's existing infrastructure is under significant strain. The Environmental Protection Agency (EPA) is currently reviewing Strandhill's Wastewater Discharge Licence, and any further zoning decisions should be postponed until this review is complete.
- **Footpaths and safe routes:** The village urgently needs improved footpaths and safe routes for children, the elderly, wheelchair users, and parents with buggies. This must be a priority before considering further residential developments.
- **Environmental concerns:** Rezoning additional lands for development risks irreversible damage to the fragile coastal environment and ecosystems of Strandhill.
- **Masterplan needed:** Strandhill requires a comprehensive master plan, developed with meaningful community consultation, to guide its sustainable growth addressing infrastructure, environmental conservation, and community needs.
- **Sufficient zoned land already provided:** The original Draft Development Plan provides ample land to meet housing needs until 2030. Expanding the zoning without adequate planning and consideration for the village's capacity does not reflect proper planning principles.
- Sligo County Council is urged to respect the recommendations of the Office of the Planning Regulator and the Minister's draft direction by removing PAZ-57 and PAZ-58 from the Sligo County Development Plan.
- The council is requested to initiate the development of a comprehensive masterplan for Strandhill, to ensure that its future growth is sustainable, community-focused and environmentally responsible.

Submission 24

<https://consult.sligococo.ie/en/submission/slg-c57-24>

Author: [Gavin Foley](#)

This submission notes that the Minister of State for Local Government and Planning gave notice of his intention to issue a direction to Sligo County Council regarding certain measures for the Sligo County Development Plan 2024-2030.

The main points of the submission are as follows:

- The decision by Sligo County Council members to rezone PAZ-57 and PAZ-58 from strategic land reserve to new residential areas reflects *“a lack of awareness regarding the lands already zoned for development in Strandhill village and does not adequately address the actual needs of the village”*.
- The intervention of the Office of the Planning Regulator and the Minister of State for Local Government is welcome.
- Strandhill requires a comprehensive masterplan developed under the leadership of Sligo County Council, with active community engagement and in collaboration with both local and national government bodies.
- Such a plan is essential to ensure integrated and sustainable development that can support the village's expansion while addressing the needs of its residents.

The submission ends by listing the following community needs:

Infrastructure - roads, paths, walkways, street lighting, dedicated footpaths / cycleways in and out of the village.

Amenities - school, village hall for all ages, sporting hub, shops.

Environment - coastal erosion, wildlife and waste management.

Submission 25

<https://consult.sligococo.ie/en/submission/slg-c57-25>

Author: [Thomas Macdonald](#)

The submission objects to the proposed rezonings PAZ-14 (from Green Belt to New Residential), and PAZ-15 (from Green Belt to New Residential and Strategic land Reserve).

There are concerns that the County Councillors who proposed these rezonings have ignored the advice offered by different agencies of the State. The submission contends that the desire to do something about the housing shortage should be in accordance with a strategy to deliver quality outcomes at a justifiable cost, and in accordance with rules, regulations and guidelines.

Submission 26

<https://consult.sligococo.ie/en/submission/slg-c57-26>

Author: [Beatrice Macdonald](#)

The submission contends that PAZ-14 and PAZ-15, proposed by Councillors, are “*at odds*” with the rules and regulations for housing, town planning and development, transport, services, and environment. Elected representatives should represent “*the people and not the interests of property developers*”.

The southern end of PAZ-15 borders a biodiversity-rich Alluvial Woodland, of which there are only five in Ireland). There is no clear line of demarcation. Biodiversity benefits human population also. Furthermore, if good agricultural land is covered in housing, it will never produce food again.

Submission 27

<https://consult.sligococo.ie/en/submission/slg-c57-27>

Author: [Alan O'Kelly](#)

This submission notes that the Minister's draft direction affects *"over 20 zoning objectives in the draft County Development Plan, resulting in the removal of approximately 70 hectares"*.

The main points of the submission are as follows:

- The majority of the rezoning objectives in Strandhill village, specifically PAZ 57 and PAZ 58, *"do not present an overall strategy for the proper planning and sustainable development of the village"*.
- The intervention of the Office of the Planning Regulator and the Minister of State for Local Government is welcome.
- The Chief Planner and the Chief Executive of Sligo County Council are urged to *"seek further direction from the Minister for Local Government regarding the removal of planning objective PAZ 58 from the Sligo County Development Plan 2024-2030"*.
- Strandhill requires a comprehensive masterplan that promotes *"integrated thinking rather than disparate individual land use plans that cater only to vested interests, potentially neglecting community needs and the principles of proper planning and sustainable development"*.
- Sligo County Council is *"encouraged"* to engage with the community to *"collaboratively master plan the future of the village"*.

Submission 28

<https://consult.sligococo.ie/en/submission/slq-c57-28>

Author: [Luke Saunders](#)

The author is a resident of Strandhill and a father of three children in the local national school. He expresses concerns about the *“proposed increasing of zoning at PAZ-57”*.

The main points of the submission are summarised below as follows:

- The zone between the church junction and the Golf Club *“is an accident waiting to happen. Adding more traffic to this area is really short sighted”*.
- The author is not opposed to Strandhill having more housing, but expect a coherent development plan for the village, that *“listens to the voice of the community”*.
- There is no footpath network linking the Top Road to the bottom part of the village. This is a *“basic requirement of most developed world settlements”*.
- Plans to *“add increased zoning to the two sites at PAZ 57 & 58 will put serious pressure on village, infrastructure, amenities, environment and most importantly, in the case of PAZ 57, is a serious safety concern”*.
- Elected representatives are there to represent the people and not the interests of property developers.

Submission 29

<https://consult.sligococo.ie/en/submission/slg-c57-29>

Author: [Peter Marron](#)

The makes several observations on PAZ-57 and PAZ-58 and calls for the '*refusal of the rezoning*' of the affected lands:

- These proposed amendments would add 4 hectares from the Strategic Land Reserve to an existing land bank. Use of the land closer to the village would contribute to a more compact village.
- Rezoning these lands could add 200 new dwellings, which would require considerable amendments to infrastructure.
- The proposed rezoning would also result in a "*huge increase in traffic on the golf club road and at the main junction in the village raising health and safety impacts for all the children of Strandhill*".
- The Golf Course Road is not suitable for the current volume of traffic and this needs to be addressed before any rezoning.
- Rezoning of the land will also restrict the school from further expansion for either building or sports facilities.
- The rezoning would add considerably to the village sprawl and would be contrary to good planning and development.

Submission 30

<https://consult.sligococo.ie/en/submission/slg-c57-30>

Author: [Shane Neary](#)

This submission notes that the Draft Direction affects *“over 20 zoning objectives in the draft County Development Plan, resulting in the removal of approximately 70 hectares”*.

The main points of the submission are summarised below as follows:

- The decisions which the elected members sought to make, such as PAZ 57 and PAZ 58, displayed *“a complete lack of awareness of what is actually zoned at present and what the village of Strandhill village actually needs”*.
- There is a large quantum of land already rezoned for development with the village. Further land should not be rezoned for the moment.
- Owners of currently zoned land should be *“made to commence development or loose the rezoning”*.
- The Chief Planner and the Chief Executive of Sligo County Council are urged to *“seek further direction from the Minister for Local Government regarding the removal of planning objective PAZ 58 from the Sligo County Development Plan 2024-2030, due to large volume of land already rezoned”*.
- Strandhill requires an open dialogue with both local and national government bodies, to draft a comprehensive master plan for the village.

Submission 31

<https://consult.sligococo.ie/en/submission/slg-c57-31>

Author: [John Monahan](#)

This submission is made “as a local Architect and resident of Strandhill”. The main points of the submission are as follows:

- The growth of Strandhill is “in line with the designation as an RGC (Regional Growth Centre) and as a Satellite village to Sligo town”.
- Alongside the permanent population, Strandhill absorbs significant volumes of people due to tourism, its natural amenities and sporting clubs, As the population grows over the six years of the development plan, Strandhill will overtake Tobercurry as Sligo’s second town.
- A potential permanent population of 2,350–2,650, as well as the aforementioned volumes of people from outside the village, requires a review of amenities and infrastructure alongside housing.
- PAZ-58 lands would result in a population range of 2,950–34,50 people over the 6 years of the Plan.
- Sustainable development considers infrastructure and amenities as the backbone to successful housing. In Strandhill, the local primary school is at capacity and without adequate grounds; there is a need for a local supermarket; there is a need for community spaces and a library. The Golf Club Road is a significant hazard for any potential development planned.
- Strandhill would benefit from a Design Framework Plan to complement its development plan. It would also benefit from a village-wide Active Travel Design for all roads.
- The rezoning of lands, in addition to those designated in the Draft Plan, would not be in line with the national and local objectives.

Submission 32

<https://consult.sligococo.ie/en/submission/slg-c57-32>

Author: [Niamh Gethin](#)

This submission notes that the Draft Direction affects “over 20 zoning objectives in the draft County Development Plan, resulting in the removal of approximately 70 hectares”.

The main points of the submission are as follows:

- The majority of the rezoning objectives in Strandhill village, specifically PAZ-57 and PAZ-58, “do not present an overall strategy for the proper planning and sustainable development of the village”.
- The intervention of the Office of the Planning Regulator and the Minister of State for Local Government is welcome.
- The Chief Planner and the Chief Executive of Sligo County Council are urged to “seek further direction from the Minister for Local Government regarding the removal of planning objective PAZ 58 from the Sligo County Development Plan 2024-2030”.
- In September 2024, the EPA set a process in train to review the Strandhill Wastewater Discharge Licence. Zoning further land for residential development, as envisaged in PAZ-58, is premature pending the outcome of this review.
- Strandhill requires a comprehensive masterplan that promotes “integrated thinking rather than disparate individual land use plans that cater only to vested interests, potentially neglecting community needs and the principles of proper planning and sustainable development”.
- Sligo County Council is “encouraged” to engage with the community to “collaboratively master plan the future of the village”.

Submission 33

<https://consult.sligococo.ie/en/submission/slg-c57-33>

Author: [Barry Carty](#)

The author is a resident of Strandhill, and a parent of two children attending Strandhill National School, who has concerns regarding the “inclusion of additional zoning objectives PAZ-57 and PAZ-58 in the Draft Development Plan”.

The main points of the submission are summarised below as follows:

- The Plan’s stated aim to “carefully manage development, prioritising the provision of adequate service infrastructure, recreational and community facilities” in villages like Strandhill is *“undermined by the elected members’ decision on September 30th to rezone an additional 8.44 hectares of land (PAZ-57 and PAZ-58) for residential use”*.
- Strandhill already has 6.46 hectares of zoned land, sufficient to accommodate 141-258 new homes (353-646 residents) as outlined in the original Plan. This additional rezoning is unnecessary, premature, and puts the long-term sustainable development of the village at risk.
- The key issues are as follows:
 - i. **Overburdening of local infrastructure:** Strandhill’s existing infrastructure is under significant strain. The Environmental Protection Agency (EPA) is currently reviewing Strandhill’s Wastewater Discharge Licence, and any further zoning decisions should be postponed until this review is complete.
 - ii. **Footpaths and safe routes:** The village urgently needs improved footpaths and safe routes for children, the elderly, wheelchair users, and parents with buggies. This must be a priority before considering further residential developments.
 - iii. **Environmental concerns:** Rezoning additional lands for development risks irreversible damage to the fragile coastal environment and ecosystems of Strandhill.
 - iv. **Masterplan needed:** Strandhill requires a comprehensive master plan, developed with meaningful community consultation, to guide its sustainable growth addressing infrastructure, environmental conservation, and community needs.
 - v. **Sufficient zoned land already provided:** The original Draft Plan provided ample land to meet housing needs until 2030. Expanding the zoning *“without adequate planning and consideration for the village’s capacity”* does not reflect proper planning principles.
- Sligo County Council is urged to respect the recommendations of the Office of the Planning Regulator and the Minister’s Draft Direction by removing PAZ-57 and PAZ-58 from the Sligo County Development Plan.
- The Council is requested to initiate the development of a comprehensive masterplan for Strandhill to ensure that its future growth is sustainable, community-focused, and environmentally responsible.

Submission 34

<https://consult.sligococo.ie/en/submission/slg-c57-34>

Author: [Aine Nic Amhlaidh](#)

The submission notes the intervention by the Minister regarding the Sligo County Development Plan 2024-2030.

The submission is summarised as follows:

- The Minister’s Draft Direction should not have been necessary. Most of this controversial rezoning is land owned/managed by the same holding company. The companies represented by the Holding Company are listed under various names including, but not limited to, Carnarvon /Omnicrest/Altitude. These companies are directly linked to the PAZ-57 and PAZ-58. These amendments to zoning have been *‘forced through by County Councillors directly contravening the Manager’s Report and all Environmental Assessed concerns raised in the Environmental Reports’*.
- The land subject to PAZ-58 (Golf Course Road) has been the subject of many lobbying activities by the developer, Cathal O’Connor, Pathway Homes.
- The submission requests that PAZ-56, PAZ-57 and PAZ 58 rezoning motions by elected representatives be dismissed having regard to the alleged conflict of interest by the developer/lobby groups, holding company and elected representatives.
- The decisions by County Councillors to approve PAZ-56, PAZ-57 and PAZ-58 for residential rezoning show a *‘complete lack of integrity and adherence to their legal obligations under Planning Regulations’*. The proposed rezoning of these parcels of land *‘indicates these individuals are in dereliction of their duty given the geological classification as High Ground Water vulnerable’*.
- The submission indicates that the amount of residential zoned land at present is more than Strandhill village wastewater system can safely manage.
- The new Wastewater Treatment Plant *‘has NEVER been compliant for safe waste disposal, even the newly constructed plant which opened 2021 is non-compliant and has breached serious toxic Nitrite pollutant levels since opening. The WWTP is non-compliant with the PART 8 and built outside the parameters and permit of that originally approved’*.
- Sligo County Council’s Chief Executive is requested to *“seek further direction from the Minister for Local Government regarding the removal of planning objective PAZ 56, PAZ 57 and PAZ 58 from the Sligo County Development Plan 2024-2030, due to the incompatibility of these proposals with the sensitive landscape and the viable wastewater treatment options”*.

Submission 35

<https://consult.sligococo.ie/en/submission/slg-c57-35>

Author: [Aine Nic Amhlaidh](#)

The main points of the submission, which relates to PAZ-56 (not subject of the Draft Direction) are summarised below.

- PAZ-56 was ‘*opposed*’ by the OPR and Uisce Éireann. Both the OPR and the Chief Executive noted that ‘*site does not accord with the mandatory objectives for sustainable settlement and transport strategies*’.
- The submission quotes **Section 33.2.2. Impact of development on its surroundings** from the Development Plan.
- PAZ-56 was not subject to infrastructural assessment, and UÉ states that it would require significant network extension to connect to wastewater services.
- This proposal for rezoning is contrary to the Planning and Development Act 2000 to provide, in the interests of the common good, for proper planning and sustainable development and the National Planning Framework objective to ensure development is sustainable in economic, social and environmental terms.
- Sligo County Council must adhere to legislation and to the recommendations of the OPR “*when a breach has been identified*”.
- Section 33.2.7 of the Development Plan (On-site wastewater treatment systems) is quoted as stating that ‘*new development is obliged to connect with the urban wastewater treatment plant*’. The most recent development (PL 18365) in this cul-de-sac did not connect to the newly constructed wastewater treatment plant, in spite of the fact that this is a mandatory requirement for all new developments. The topography of this landscape, the high water table and the underlying geology classified as High Ground Water Vulnerable make this wastewater treatment plant connection impossible.
- Elected officials are “*legally obliged not to take into account matters not relating to the proper planning and sustainable development in the performance of planning functions*”. Thus, it is argued, this proposed rezoning “*is outside of the remit of the Elected Officials*”.
- The submission requests that the Chief Executive adhere to the legislation and PAZ-56 not be zoned residential due to the concerns highlighted above.

Submission 36

<https://consult.sligococo.ie/en/submission/slg-c57-36>

Author: [John Cox](#)

Without specifically mentioning PAZ-14 or PAZ-15, the submission supports the zoning lands at Hazelwood. It indicates there has been no “*real*” development other than student housing or social housing in the past two decades, leading to a vast reduction in the number of young people in the area.

There is “*the largest density of employment*” in this area – the hospital, the University, two Abbvie plants and other smaller businesses. Currently people are commuting “*from as far as Carrick on Shannon*” because of the lack of housing in Sligo.

Housing in the vicinity of large employers, in a community that has capacity in schools and sporting organisations, would reduce the need for transport.

Submission 37

<https://consult.sligococo.ie/en/submission/slg-c57-37>

Author: [Strandhill Community Development Association](#)

Strandhill Community Development Association welcomes the core strategy outlined in the draft Sligo County Development Plan to “*carefully manage development, prioritising the provision of adequate service infrastructure, recreational and community facilities*” in the village. At the same time, the submission expresses concern regarding the proposed new housing, which could put serious pressure on the village infrastructure, amenities and the environment.

The main points of the submission are summarised below.

- The SCDA acknowledges and understands that new housing is essential for the growth of the village, but it is essential that such housing is developed in a sustainable way that does not unduly put pressure on existing infrastructure.
- The Draft Development Plan recommended that the potential housing range ought to be in the region of 141-258 housing units. The two developments, PAZ-57 and PAZ-58, when taken together, would increase that number to between 373-596 housing units.
- At the Council meeting, some representatives “*went inexplicably against the advice of the Office of the Planning Regulator (OPR) and the CEO of Sligo County Council*”.
- It is incumbent on Sligo County Council to provide adequate facilities to support increased housing. Strandhill needs indoor sport and social amenities, which are as important to a community as adequate water treatment. For the village and its community to grow sustainably, Strandhill needs increased investment in community facilities.
- If the population is to expand, then it is imperative to allow for school expansion also, to have increased investment in water treatment infrastructure, new pedestrian and cycle friendly roads and other important spending must also be provided for to ensure that Strandhill grows to meet the demand of new residents, while not unduly affecting current residents.
- New development should occur in the context of an overall masterplan for the village that is cognisant of all these points.

Submission 38

<https://consult.sligococo.ie/en/submission/slg-c57-38>

Author: [Edel Hackett](#)

Without specifically mentioning PAZ-14 or PAZ-15, the submission supports the construction of 600 houses at Hazelwood. It states that it is impossible to buy a house in the Calry area, which has an elderly population, but needs new families of a younger age group.

Submission 39

<https://consult.sligococo.ie/en/submission/slg-c57-39>

Author: [Joe Gonley](#)

The submission refers to PAZ-14 and PAZ-15. It indicates that housing developments at Hazelwood would have a positive impact in the area, which is close to the ATU, Sligo Hospital and several enterprises. The area is a short distance from the town and has *"an ample supply of amenities on its doorstep"*.

Submission 40

<https://consult.sligococo.ie/en/submission/slg-c57-40>

Author: [Mary Allen-Kiely](#)

The author objects to the “*development plan*” for the following reasons: overpopulation, lack of infrastructure, lack of wastewater treatment facilities, concern for location close to school, increase in vehicle usage, safety concerns for cyclists and pedestrians, threat to wildlife, sand dunes and unique fauna of the region, spoiling the beauty of the region affecting tourism.

The submission states that there is already “*a development planned of c. 250 so to add a further 400 plus will have a lasting detrimental effect on already overburdened village*”.

The author has indicated that the location referred to in the submission is Strandhill.

Submission 41

<https://consult.sligococo.ie/en/submission/slg-c57-41>

Author: [Mary Keady](#)

This submission notes that the Draft Direction *“affects over 20 zoning objectives in the draft County Development Plan, resulting in the removal of approximately 70 hectares”*.

The main points of the submission are as follows:

- The majority of the rezoning objectives in Strandhill village, specifically PAZ 57 and PAZ 58, *“do not present an overall strategy for the proper planning and sustainable development of the village”*.
- The intervention of the Office of the Planning Regulator and the Minister of State for Local Government is welcome.
- The Chief Planner and the Chief Executive of Sligo County Council are urged to *“seek further direction from the Minister for Local Government regarding the removal of planning objective PAZ 58 from the Sligo County Development Plan 2024-2030”*.
- Strandhill requires a comprehensive masterplan that promotes *“integrated thinking rather than disparate individual land use plans that cater only to vested interests, potentially neglecting community needs and the principles of proper planning and sustainable development”*.
- Sligo County Council is *“encouraged”* to engage with the community to *“collaboratively master plan the future of the village”*.

Submission 42

<https://consult.sligococo.ie/en/submission/slg-c57-42>

Author: [Pat Ryan](#)

This submission notes that the Draft Direction affects *“over 20 zoning objectives in the draft County Development Plan, resulting in the removal of approximately 70 hectares”*.

The main points of the submission are as follows:

- The majority of the rezoning objectives in Strandhill village, specifically PAZ 57 and PAZ 58, *“do not present an overall strategy for the proper planning and sustainable development of the village”*.
- The intervention of the Office of the Planning Regulator and the Minister of State for Local Government is welcome.
- The Chief Planner and the Chief Executive of Sligo County Council are urged to *“seek further direction from the Minister for Local Government regarding the removal of planning objective PAZ 58 from the Sligo County Development Plan 2024-2030”*.
- Strandhill requires a comprehensive masterplan that promotes *“integrated thinking rather than disparate individual land use plans that cater only to vested interests, potentially neglecting community needs and the principles of proper planning and sustainable development”*.
- Sligo County Council is *“encouraged”* to engage with the community to *“collaboratively master plan the future of the village”*.

Submission 43

<https://consult.sligococo.ie/en/submission/slg-c57-43>

Author: [Cian Allen-Kiely](#)

This submission expresses concern regarding the inclusion of additional zoning areas (PAZ-57 and PAZ-58) in the Draft Development Plan. The *“proposed plans”* would add 1,088 persons (to Strandhill), or *“a full third of the village’s population”*.

The key issues are as follows:

- Impact on village amenities and infrastructure - the wastewater treatment plant is already overburdened, as is the local school and bus link.
- Safety of pedestrians and children - the footpaths are not up to standard and are far too narrow for sheer volume of use. Adding more people and traffic to the area raises concerns about public safety.
- Environment, fauna and flora - additional development would seriously impact the local wildlife and the already threatened dune area.
- Tourism - adding 1,000 people to the village could have serious negative effects on the experience of tourists, thereby affecting the revenue received from tourism.
- Land already zoned - the original Draft Development Plan *“provides more than enough area to meet housing requirements without jeopardising the safety of locals or the environment”*.

The Council is urged to reconsider the plans.

Submission 44

<https://consult.sligococo.ie/en/submission/slg-c57-44>

Author: [John Tuohy](#)

This submission notes that the draft direction affects *“over 20 zoning objectives in the draft County Development Plan, resulting in the removal of approximately 70 hectares”*.

The main points of the submission are as follows:

- The majority of the rezoning objectives in Strandhill village, specifically PAZ 57 and PAZ 58, *“do not present an overall strategy for the proper planning and sustainable development of the village”*.
- The intervention of the Office of the Planning Regulator and the Minister of State for Local Government is welcome.
- The Chief Planner and the Chief Executive of Sligo County Council are urged to *“seek further direction from the Minister for Local Government regarding the removal of planning objective PAZ 58 in addition to PAZ-57, from the Sligo County Development Plan 2024-2030”*.
- Strandhill requires a comprehensive masterplan that promotes *“integrated thinking rather than disparate individual land use plans that cater only to vested interests, potentially neglecting community needs and the principles of proper planning and sustainable development”*.
- Sligo County Council is *“encouraged”* to engage with the community to *“collaboratively master plan the future of the village”*.

Submission 45

<https://consult.sligococo.ie/en/submission/slg-c57-45>

Author: [Mary Quinn](#)

This submission notes that the Minister's Draft Direction affects *"over 20 zoning objectives in the draft County Development Plan, resulting in the removal of approximately 70 hectares"*.

The submission indicates that three of the *"rezoning objectives"* in Strandhill village, specifically PAZ-56, PAZ 57 and PAZ 58, are *"not consistent with the core strategy of proper planning"*. The intervention of the Office of the Planning Regulator and the Minister of State for Local Government is welcomed.

The Chief Planner and the Chief Executive of Sligo County Council are urged to *"seek further direction from the Minister for Local Government regarding the removal of planning objective PAZ 56 from the Sligo County Development Plan 2024-2030"* for the following reasons:

- PAZ-56 is in a peripheral location, outside the CSO settlement boundary, and – if rezoned residential – would leapfrog extensive undeveloped residential zoned land closer to the village centre.
- PAZ-56 is not fully serviced or serviceable during the six-year period of the CDP 2024–2030.
- PAZ -56 is not Tier 1 or even Tier 2.
- PAZ-56 is located in a cul-de-sac which has no footpaths, but has a blind corner, resulting in safety issues for current and future residents.

Submission 46

<https://consult.sligococo.ie/en/submission/slg-c57-46>

Author: [Michelle Butler](#)

This submission notes that the Minister's Draft Direction affects *"over 20 zoning objectives in the draft County Development Plan, resulting in the removal of approximately 70 hectares"*.

The main points of the submission are as follows:

- The majority of the rezoning objectives in Strandhill village, specifically PAZ 57 and PAZ 58, *"do not present an overall strategy for the proper planning and sustainable development of the village"*.
- The intervention of the Office of the Planning Regulator and the Minister of State for Local Government is welcome.
- The Chief Planner and the Chief Executive of Sligo County Council are urged to *"seek further direction from the Minister for Local Government regarding the removal of planning objective PAZ 58 from the Sligo County Development Plan 2024-2030"*.
- Strandhill requires a comprehensive masterplan that promotes *"integrated thinking rather than disparate individual land use plans that cater only to vested interests, potentially neglecting community needs and the principles of proper planning and sustainable development"*.
- Sligo County Council is *"encouraged"* to engage with the community to *"collaboratively master plan the future of the village"*.

Submission 47

<https://consult.sligococo.ie/en/submission/slg-c57-47>

Author: [Adrian Hamilton](#)

The author of this submission requests the removal of zoning objective PAZ-56 from the County Development Plan for the reasons laid out below:

- This is a low-lying piece of land at the periphery of Strandhill, outside the settlement boundary, in a cul-de-sac which does not have access to the main sewer.
- The land is in a quiet cul-de-sac with a blind corner and no footpaths.
- The zoning of this land is *“not aligned with objectives of the zoning strategy where land in the centre of village should be zoned first ahead of the periphery”*.

Submission 48

<https://consult.sligococo.ie/en/submission/slg-c57-48>

Author: [Noel Kelly](#)

The submission expresses concerns regarding the plans for Strandhill Village in the Sligo County Development Plan 2024-2030.

It is noted that the proposed rezoning would result in a potential increase of up 1,088 new residents to the village. Given that the population of Strandhill was 1,982 persons in 2022 (census), this proposed increase considered 'drastic'.

It is difficult to align this proposed increase with the plan's core strategy of *"prioritising the provision of adequate service infrastructure, recreational and community facilities"*.

If such a change is necessary, it should be *"properly planned with input from the appropriate community groups, local residents, and technical experts"*.

Rezoning *"without a holistic planning approach seems certain to cause far greater problems in the longer term than it attempts to solve in the short term"*.

Submission 49

<https://consult.sligococo.ie/en/submission/slg-c57-49>

Author: [Bernard Mulhern](#)

The author states that he is a primary school Principal, who is *"acutely aware of the necessity to ensure that there are adequate recreational facilities available both for the present residents but also for the future generations"*.

The submission expresses *"grave concerns"* regarding the Sligo County Development Plan 2024-2030, in particular the inclusion of PAZ-57 in the Development Plan.

- The Draft Direction issued by the Minister of State for Local Government is welcomed.
- The decision by local representatives, on 30 September 2024, to rezone an additional 8.44 ha of land in the village contravenes the objective in the Development Plan to *"carefully manage development, prioritizing the provision of adequate service infrastructure, recreational and community facilities"* in villages.
- There is already sufficient zoned land in Strandhill to *"accommodate the new build requirement. Any extra rezoning will only exacerbate the strain on existing resources due to the lack of facilities"*.
- Strandhill needs a community centre that will *"serve the needs of our youth, our adult population, our older people and people with disabilities"*.
- The land subject to PAZ-57 should be zoned solely for recreational use. It is the most suitable location for a large Community Centre/car park/astro/grass pitches/running track with indoor courts.

Submission 50

<https://consult.sligococo.ie/en/submission/slg-c57-50>

Author: [Patrick Coen](#)

The submission notes the inclusion of PAZ-14 and PAZ-15 in the Draft Ministerial Direction, among other issues and zoning objectives.

It also notes that the Draft Direction seeks to revert the zoning of both parcels of land because there is sufficient land already zoned in the Development Plan, there is no provision to extend water/wastewater facilities to this area and there are concerns about the impact on the biodiversity of the area.

The submission requests that the lands remain as currently zoned and that the regional road R-286 be “reviewed” to meet domestic and business needs of this area, in light of the proposed Eastern Bridge and the planning application by Hazelwood Distillery.

Submission 51

<https://consult.sligococo.ie/en/submission/slg-c57-51>

Author: [Board of Management Scoil Asicus Naofa Strandhill](#)

This Board of Management makes the following observations on PAZ-57 and PAZ-58 in Strandhill:

- The Minister’s proposal regarding PAZ-57, to revert the lands to Strategic Land Reserve (SLR) from New Residential, is welcomed.
- The proposed rezoning is not sufficient *“and must be accompanied by a comprehensive and balanced plan for the future growth of the village”*, taking into account the need for adequate social facilities including access to and provision for education.
- The plans to add potentially 150 new dwellings on two plots of land adjacent to Scoil Asicus Naofa would require considerable amendments to infrastructure such as sewer, drainage, roads and educational facilities. Scoil Asicus Naofa does not have capacity for *“further cohorts of students who would arrive from the new housing developments”*.
- The current road is inadequate and dangerous for its current level of use by the school and visitors to the Golf Club. There should be no more dwellings in this area until the road is significantly widened and made safe as a school-zone.

Submission 52

<https://consult.sligococo.ie/en/submission/slg-c57-52>

Author: [David Cummins](#)

Without specifically mentioning PAZ-14 or PAZ-15, the submission supports the zoning of lands at Hazelwood. The author would like his four children to *“have a chance to live in this beautiful area of Sligo”*, but such option does not exist.

Employers such as the ATU, Sligo University Hospital, AbbVie are present in the area, but there is no accommodation for workers. Additional housing development would “boost” the local community, schools and sports organisations.

Submission 53

<https://consult.sligococo.ie/en/submission/slg-c57-53>

Author: [Deirdre Norton](#)

Without specifically mentioning PAZ-14 or PAZ-15, the submission supports development at Hazelwood, which will house more families, create more jobs, contribute to local schools and sports clubs. The area is close St Angela's college, ATU, the Hospital and companies like Abbots, which makes it desirable for living.

Submission 54

<https://consult.sligococo.ie/en/submission/slg-c57-54>

Author: Carty Contractors

The submission supports the zoning of the lands subject to PAZ-41 for Business, Industry, Enterprise (BIE), which is considered *“essential to support economic growth, job creation, and sustainable development in the area”*.

It is indicated that the site was zoned for Business and Enterprise in the CDP 2017-2030, which highlights its suitability for such purposes.

Four categories of reasons are invoked in support of retaining BIE zoning for the lands subject to PAZ-41, as detailed below.

1. *“Inaccurate infrastructure assessment:*

- *The infrastructure assessment of PAZ41 incorrectly stated that the lands are not fully serviced. This is inaccurate, as there is a footpath along the N59 road that runs directly in front of the site, providing essential pedestrian connectivity.*
- *Additionally, the site’s anticipated small foul loading can be treated on-site, ensuring that wastewater treatment does not pose a barrier to development.*

2. *Strategic importance for Business and Employment:*

- *These lands, together with adjoining lands, represent the only available lands zoned for Business/Industry/Enterprise (BIE) in the area.*
- *There is a demonstrable need for BIE-zoned lands to facilitate development and create employment opportunities in the locality, supporting both local and regional economic objectives.*

3. *Planning and Road Safety Considerations*

- *A recent planning application for a storage warehouse on these lands was refused for a single reason: concerns regarding the intensification of access onto the N59, which currently has an 80 km/h speed limit.*
- *However, it is anticipated that this speed limit will be reduced to 60 km/h, aligning with ongoing road safety measures. This change will address the refusal reason, enabling the planning application to be granted and unlocking the development potential of these lands.*

4. *Historical Zoning and Council Support*

- *PAZ41 was previously zoned for Business and Enterprise in the 2017–2023 Development Plan, establishing a clear precedent for its suitability for economic uses.*
- *The current proposal by Sligo Council to Green Belt this site PAZ 41 & the adjoining Site PAZ 44 both which were previously zoned Business and Enterprise under the 2017–2023 Development Plan would leave Ballisodare with no lands zoned Business/Industry/Enterprise (BIE) this would be detrimental to the Ballisodare area.*
- *The elected members of the Council have already demonstrated their support for retaining BIE zoning, reflecting the site’s strategic value for the community and local economy.”*

Submission 55

<https://consult.sligococo.ie/en/submission/slg-c57-55>

Author: [Daithí Hand](#)

The submission welcomes the Draft Directive regarding PAZ-14 and PAZ-15 but proceeds to highlight the urgent need for housing in the Calry area, which “*services the ATU and the hospital*” in terms of accommodation.

The author states that the lack of housing for young local families “*has been a persistent problem in the last ten years*”.

Submission 56

<https://consult.sligococo.ie/en/submission/slg-c57-56>

Author: [David Collery](#)

The submission supports the residential zoning of the lands subject to PAZ-14 and PAZ-15, indicating that *“there is an overwhelming demand for housing in this area”*. It states that people who work in the Atlantic Technological University cannot get accommodation in Sligo and must travel from neighbouring counties.

It is further stated that the area proposed to be zoned *“is serviced with a connection to Sligo wastewater treatment plant”*. Within 2 km there are the University Hospital Sligo, Atlantic Technological University, five primary schools, and within 5 km there are five post-primary schools.

The Hazelwood area is described as *“extremely well serviced with facilities”* and the development is said to be welcomed by the community.

The submission considers that growth in Sligo town should be sustainable and balanced on all sides of the town.

Submission 57

<https://consult.sligococo.ie/en/submission/slg-c57-57>

Author: [Ann Marie Gavin](#)

The submission supports the Business, Industry, Enterprise (BIE) zoning of the site subject to PAZ-41 in Ballysadare.

The author urges the Chief Planner and the Chief Executive of Sligo County Council to retain Business/Industry/Enterprise (BIE) zoning for PAZ-41, as this site is *“essential to support economic growth, job creation and sustainable development in the area”*.

It is indicated that the existing infrastructure, strategic location, and historical zoning of the site *“highlight its suitability for these purposes”*, and that *“anticipated improvements in road safety will address planning concerns, ensuring the land can be developed to its full potential”*.

Submission 58

<https://consult.sligococo.ie/en/submission/slg-c57-58>

Author: [Karl Hannon](#)

The submission supports the Business, Industry, Enterprise (BIE) zoning of the site subject to PAZ-41 in Ballysadare.

The author urges the Chief Planner and the Chief Executive of Sligo County Council to retain Business/Industry/Enterprise (BIE) zoning for PAZ-41, as this site is *“essential to support economic growth, job creation and sustainable development in the area”*.

It is indicated that the existing infrastructure, strategic location, and historical zoning of the site *“highlight its suitability for these purposes”*, and that *“anticipated improvements in road safety will address planning concerns, ensuring the land can be developed to its full potential”*.

Submission 59

<https://consult.sligococo.ie/en/submission/slg-c57-59>

Author: [Brian Collery](#)

The author welcomes the Minister's Draft Direction regarding PAZ-57. The main points of the submission are as follows:

- PAZ-57 would increase the amount of land zoned for residential use in Strandhill in a disproportionate and unreasonable manner at this peripheral location.
- There are already serious health and safety concerns with regard to vehicular and pedestrian access to the school, which adjoins the land subject to PAZ-57. Adding 100+ houses at the end of this road exacerbates such concerns.
- The Chief Executive, the OPR and the Minister of State for Local Government and Planning are asked to reconsider the decision to rezone PAZ-58 from Strategic Land Reserve (SLR) to New Residential (nRES). This *"quantum of zoning does not present an overall strategy for the proper planning and sustainable development of the village"*.
- Following the proposed inclusion of PAZ-56 and PAZ-58 in the Strandhill Village Plan, the potential housing yield, from Strandhill alone, could surpass the previous housing allocation for the five Satellite Villages combined. This is not a sustainable approach.
- There needs to be a comprehensive masterplan for Strandhill, driven by Sligo County Council, with community engagement.

Submission 60

<https://consult.sligococo.ie/en/submission/slg-c57-60>

Author: [Michael Friel](#)

This submission refers to the previous submission made by Eunan Friel at Proposed Amendments stage. The agent (Michael Friel) notes that the Chief Executive recommended that the Development Plan be made without PAZ-11, but the Council voted to retain the amendment.

The agent understands *"that the amendments were then sent to the Minister and the Office of the Planning Regulator (OPR) for their consideration and opinions, where the OPR recommended that the plan should be made without the inclusion of the amendment proposed by the elected Council, this now seems to be the position which has been taken and accepted by the Council Executive insofar as it is intended to make the plan without the amendment"*.

The submission states that the Chief Executive's concern relating to the potential UNESCO designation *"does not stand up to any scrutiny as the site at Tonaphubble is located quite a distance from the proposed UNESCO designated lands so as to have no impact on the designation"*.

It is indicated that:

- the lands at Tonaphubble are at a much lower level than the proposed designation site and do not have a hydrological link to the proposed designated site;
- the lands are served by a carriageway over 5 m wide and there is a 1.5-m footpath in place along the full length of the road;
- no widening works would be required for access to the proposed UNESCO site; it is *"not only unfair but wholly untrue to infer that designating this site for Housing will impact on the proposed designation of the UNESCO sites"*.

The agent notes that the Sligo Neolithic Committee *"did not make any submission or object to the proposed zoning under PAZ- 11 during the public consultation of the Development Plan or at any other stage in the Plans progression"*.

In relation to the service status of the lands, the agent indicates that *"there is a Sewage Drainage Network already in place which can be connected to and which has capacity passing through the lands in question and pending a pre-connection enquiry to Uisce Eireann will be available to be connected to"*.

The submission further mentions that the Councilors *"have repeatedly stated that there is not enough land zoned for Residential development within the Town of Sligo to meet the expected demand into the future"*, yet serviced sites (such as the lands subject to PAZ-11) are being *"overlooked or excluded from being zoned"* for residential development.

The alleged effect would be an increase in the price of development lands and in the price of housing. It is stated that *"it is absolutely essential that lands are zoned to allow for Housing developments to be put in place at locations which are suitable, accessible and serviceable as these lands most definitely are"*.

The agent believes that *"the final decision on the zoning within Sligo Town is still at a stage where amendments can be made prior to Ministerial sign off"* and he implores the Chief Executive *"to stand with your elected Council and the people of Sligo in allowing adequate lands to be zoned for the provision of Housing and in particular the lands at Tonaphubble, County Sligo where an amendment was accepted by the elected Councilor's under reference PAZ-11"*.

Submission 61

<https://consult.sligococo.ie/en/submission/slg-c57-61>

Author: [Keith Carty](#)

The submission supports the New Residential (nRES) zoning of the site subject to PAZ-63 in Ballinafad.

The submission, prepared by Darren Clancy Design and Planning Consultant, includes a map showing the extent of the flood zone and indicates the following:

- the site is located on elevated ground, away from the flood zone;
- the lower section of the site would be used exclusively for open space;
- the portion of the lands located in the flood zone is not owned by Keith Carty, and it is not requested that these lands be zoned residential;
- 10 houses can be accommodated on the site, with 26% open space/green area (the submission includes a site layout plan of the proposed residential development showing a row of 10 houses located on the more elevated part of the site with the open space being located on the lower part of the site. The submitted site layout plan shows that none of the proposed houses or the associated open space overlap with Flood Zone A and / or B).
- the site has access to the watermain, foul sewer, surface water drainage, public road and footpath;
- any future development would be connected to the existing public sewer, located 35 m from the site boundary, through a new pipe which can be laid along the public road;
- Corrick Group Water Scheme pump house is located on the opposite side of the road and a connection to the network can be facilitated;
- a surface water drainage pipe can be taken to a nearby drain and a sustainable urban drainage method can be agreed with the Council;
- a public footpath is located 30.6 m from the site and can be extended to serve any new development.

The submission refers to a meeting with an engineer from the Water Services section of Sligo County Council, who is said to have confirmed that the nearest point of connection to the public sewer is just 35.5 metres from the site.

Submission 62

<https://consult.sligococo.ie/en/submission/slg-c57-62>

Author: [Hazel Feeney](#)

This submission notes that the Draft Direction affects *“over 20 zoning objectives in the draft County Development Plan, resulting in the removal of approximately 70 hectares”*.

The main points of the submission are summarised below as follows:

- The majority of the rezoning objectives in Strandhill village, specifically PAZ-57 and PAZ-58, *“do not present an overall strategy for the proper planning and sustainable development of the village”*.
- The intervention of the Office of the Planning Regulator and the Minister of State for Local Government on zoning objective PAZ-57 is welcome.
- The Chief Planner and the Chief Executive of Sligo County Council are urged to *“seek further direction from the Minister for Local Government regarding the removal of planning objective PAZ 58 from the Sligo County Development Plan 2024-2030”*.
- Strandhill requires a comprehensive masterplan that promotes *“integrated thinking rather than disparate individual land use plans that may cater only to vested interests, potentially neglecting community needs and the principles of proper planning and sustainable development”*.
- Sligo County Council is *“encouraged”* to engage with the community to *“collaboratively master plan the future of the village”*.

Submission 63

<https://consult.sligococo.ie/en/submission/slg-c57-63>

Author: [Joan Swift](#)

The submission is *"mainly supportive of the various points"* made by the OPR in relation to zoning in Sligo Town and notes that these points have been repeated in the Ministerial Direction.

The author indicates her familiarity with the legislative basis for the involvement of the OPR and the Minister in the making of the County Development Plan.

While mainly agreeing with *"the various points concerning Sligo town made in the Ministerial Directive and supported by reference to the objectives in the National, Regional and Local Planning documents"*, the author suggests that *"another reading of the planning objectives is possible in relation to the proposed zoning of PAZ 11 and PAZ 12"*, specifying that she has no material interest in these lands.

The submission states that the Tonaphubble area has *"outstanding recreational green space"* such as Sligo Racecourse, Cleveragh Park, Cairns Wood and the Riverside, and amenities such as a swimming pool, playing pitches, walking trails, a gym. Any *"minor encroachment on a green belt area"* would be *"less serious"* than in an area without such amenities.

The construction of the new Eastern Garavogue Bridge will facilitate access to major employers, such as ATU, Sligo Hospital and AbbVie.

The area is also close to primary and secondary schools and to supermarkets. Other lands (such as Caltragh), which are located near major roads, do not have public or active transport facilities and are not close to shopping or educational facilities (except for Summerhill College).

The author considers that *"due to the proximity of employment, educational and outstanding recreational facilities the entire area around Tonaphubble/Holy Well Road is in my opinion ideally located for some further housing development"*.

Such developments would be located close to the water treatment plants at both Cairns Hill and Foxes Den.

While the concern regarding interference with the neolithic landscape is valid *"to an extent"*, sensitive construction *"should help to alleviate any difficulties"*. The author argues that residential areas *"can act as a form of passive surveillance of sensitive sites"*, unlike the monuments at Carrowkeel and Knocknarea, which are *"difficult to secure"* and have suffered damages.

Submission 64

<https://consult.sligococo.ie/en/submission/slg-c57-64>

Author: [Eileen Carty](#)

The submission expresses support for the zoning of the lands subject to PAZ-57 as New Residential (nRES) for the following reasons:

- There is a current planning application submitted for this site.
- There is an urgent need for housing to be provided in Strandhill.
- The site is situated in the village core and is *“sequentially preferable over all the currently zoned residential lands in Strandhill”*.
- The site is a serviced site and identified as a Tier 1 site in the CDP Infrastructural Assessment.

The submission notes that the site was previously zoned residential, from 2003 to 2013. The lands were placed in SLR *“as a short-term measure”* due to the 2008 economic downturn.

Submission 65

<https://consult.sligococo.ie/en/submission/slg-c57-65>

Author: [Beldare Homes](#)

This submission, prepared by consultant Robert Keran on behalf of Beldare Homes, is one of **six** with similar contents. **Submission 65** consists of four parts and an Appendix, as follows:

1. Introduction
 2. Basis for and structure of submission
 3. Relevant national and regional planning policy
 4. Lands to the West of Ballysadare (North of the N69), Co. Sligo
- Appendix 1 – Copy of Draft Direction

In essence, the submission supports the retention of New Residential (nRES) zoning for the lands subject to PAZ-45. This is stated clearly at the end of the submission, in Subsection 4.22: “... *in accordance with Section 10(2)(n) of the Planning and Development Act 2000, as amended, the zoning of the site at Ballysadare for residential purposes is considered to be fully in accordance with the national and regional planning policy, the Development Plan Guidelines for Planning Authorities and the principles of proper planning and sustainable development*”.

Below is a **summary of the views** expressed in this submission (as required by Section 31(9) of the Planning and Development Act 2000, as amended), as well as further details of the points made by the consultant.

Section 1 indicates that the submission is made on behalf of Beldare Homes and its subsidiary companies, including Altitude Distribution Ltd. Beldare Homes is described as a “*large scale residential developer based in the north-west of Ireland and operating at a nationwide reach*”.

The consultant further indicates that Altitude Distribution Ltd. has been granted leave for judicial review of “*certain elements of the Sligo County Development Plan 2024–2030*”.

Section 2 indicates that this submission relates to “*a site to the west of Ballysadare, Co. Sligo.*” and that a separate submission has been made “*by Beldare Homes and subsidiary companies including Altitude Distribution Ltd.*” in relation to “*Systemic Procedural errors in the making of the Sligo County Development Plan 2024–2030, Material errors in the Core Strategy of the Sligo County Development Plan 2024–2023 and Incorrect Application of the Settlement Capacity Audit*”. A summary of that submission is included.

[Please refer to the summary of **Submission 82**, which is the separate submission mentioned above.]

Section 3 of the submission lists and quotes from relevant national and regional planning policy documents, as they are referred to in the Draft Direction:

- Section 10(2)(n) of the Planning and Development Act 2000 (as amended);
- NPO 3(c) NPO 18(a), NPO 60, NPO 72(a)-(c) of the National Planning Framework;
- RPO 3.2(b), RPO 3.7.39, RPO 5.14 of the Regional Spatial and Economic Strategy;
- Section 6.2.3 of the Development Plan Guidelines for Planning Authorities (2022).

Section 4 is titled “*Lands to the west of Ballysadare (north of the N69), Co. Sligo*” and seeks to demonstrate that “*the site is sequentially preferable, serviced or capable of being serviced, and within or appropriate to be within the settlement boundary, would not adversely affect natural or cultural heritage*”.

- **Subsection 4.3** states the consultant’s opinion that the CSO settlement boundaries have no relevance to decision-making “*in terms of the preferred location of the zoning of land*”, because NPO 3(a) does not preclude consideration of such lands.
- **Subsection 4.4** reiterates the consultant’s opinion that the CDP “*significantly under-estimates the quantum of zoned land that is required for residential purposes*”.
- **Subsection 4.7** indicates that “*the site is assessed under the following headings*:
 - *Draft Ministerial Direction relating to the site*
 - *Infrastructure Assessment and Compliance with Sequential Approach in the Development Plan Guidelines (Section 6.2.3)*
 - *Summary of compliance with national and regional objectives*”
- **Subsections 4.9** describes the location of the site.
- **Subsections 4.10 to 4.13** indicate that the site was not initially considered in the Infrastructural Assessment as part of the Draft Plan and seek to demonstrate that the site would meet the criteria for Tier 1 and would score 87 points in a Settlement Capacity Audit included “*in a submission by McCutcheon Halley Planning Consultants of December 2023 on the Draft Sligo County Development Plan 2024 -2030, on behalf of on behalf of Cathal O’Connor and David Mc Munn*”.
- **Subsections 4.14 and 4.15** present the consultant’s assessment of the site as follows:

4.14 *Following from the above, the table below represents an assessment of the site using the Settlement Capacity Audit (SCA) criteria used by Sligo County Council. it can be seen that, even when using the SCC criteria, the site performs very well. Whilst it is not accepted that this scoring system is the correct approach to the SCA, where it is applied to the site, the site performs very strongly.*

Site	Proximity to Town Centre	Notes / Basis	Designation in HDAP or RSES	Notes / Basis	Flood Risk	Notes / Basis	Planning History	Notes / Basis	Total Points
Site	15	Site 8, directly south of the subject site, scored 15	0	No such designation	10	No identified flood risk	0	No relevant planning history	25

4.15 *When compared to other sites assessed in the SCA (see below), the site scores equal to 6 other sites at 25 points, exceeded only by Site 2.*

		"Spatially sequential" test (max. 20 points)	Planning and environmental status (max. 50 points)			Total score (max. 70 points)
IA Site No.	Compact Growth designation	Proximity to Town Centre	Designation in HDAP or RSES	Flood Risk	Planning History	Total points
2	SCS-02	15	0	10	5	30
1	SCS-01	15	0	10	0	25
3	SCS-03	15	0	10	0	25
4	SCS-04	10	0	10	5	25
5	SCS-05	15	0	10	0	25
6	AP-01	15	0	10	0	25
7	SLR-01	15	0	10	0	25
8	BIE-01	15	n/a	10	0	15
PAZ-43		10	0	10	0	20

4.16 As previously outlined, the SCA undertaken by Sligo County Council does not take account of multiple relevant criteria for smaller settlements in the County, such as Ballysadare, and therefore ignores relevant considerations for the subject site, such as its location a short distance to St. John's National School to the east

4.17 The site is therefore considered to be a Tier 1 (and at worst, a Tier 2 site, i.e. serviceable within the lifetime of the Development Plan) site and sequentially suitable for residential development.

- **Subsections 4.19 and 4.20** include the consultant's view of the OPR's recommendation regarding PAZ-45, as follows:

4.18 To address a number of points above:

4.19 The point about sites being outside the settlement limit has already been addressed. As an isolated test of a sites suitability for zoning, this is considered an arbitrary and misleading metric and bears no relation to the form that a particular settlement may take.

4.20 In relation to leapfrogging, this relates to geographical proximity to the town centre only and should not be a test in isolation. Without including the subject site in the Infrastructural Assessment and a properly conducted SCA, no balanced and objective test of the suitability of the site in comparison to other sites can be carried out. The site directly adjoins public open space which includes a walking track, football pitch, playground and creche.

4.21 Reference to the site being not fully serviced is noted, however the UE submission demonstrates that the site is serviceable (i.e. Tier 2). At worst therefore, the site is a Tier 2 site.

4.22 Reference by the OPR to green belt lands. These are not green belt lands, but rather a ring fort, and as such the land is not developable.

4.23 There are a number of other relevant points also:

4.24 Site 4 in the SCA is now entirely complete for residential development, and was complete before the County Development Plan was adopted, under Reg. Ref: 2360119. This site

should therefore not be included to meet future housing demand. This results in a shortfall of 2 hectares of zoned land.

4.25 *PAZ-46 is SLR, however, it was proposed as nRES in the Draft Plan. When this land was moved to SLR, PAZ-43 was introduced at material amendment stage for a change from Community Facilities to nRES. However the quantum of land zoned nRES at 1.68 ha is well below the area of PAX-46 which was proposed as nRES at Draft Plan stage, at 3.26 ha. This results in a shortfall of 1.59 ha of zoned land.*

- **Subsection 4.21** attempts to summarise the compliance with national and regional planning objectives, in the following manner:

4.26 *NPO 3c – the zoning at this site at Ballysadare would not be contrary to the objective to deliver at least 30% of all new homes in settlements other than the five Cities and their suburbs, within their existing built-up footprints. whilst outside the 2022 CSO settlement boundary of Ballysadare, the zoning has been shown to be sequentially suitable.*

4.27 *NPO 18a – the zoning at Ballysadare would not be contrary to the objective to support the proportionate growth of and appropriately designed development in rural towns that will contribute to their regeneration and renewal, including interventions in the public realm, the provision of amenities, the acquisition of sites and the provision of*

4.28 *services. The zoning would allow for the delivery of new homes with supporting social infrastructure in a sustainable location in Ballysadare.*

4.29 *NPO 60 – there are no known impediments to the zoning of the site in terms of conserving and enhancing the rich qualities of natural and cultural heritage of Ireland in a manner appropriate to their significance.*

4.30 *NPO 72c – it has been demonstrated that the Ballysadare lands are serviced (Tier 1), or at worst are Tier 2, and as such are not lands which “cannot be serviced within the life of the relevant plan, such lands should not be zoned for development”.*

4.31 *RPO 3.2(b) – is to “Deliver at least 40% of all new housing targeted in the Regional Growth Centres, within the existing built-up footprint”. Whilst Ballysadare is not a Regional Growth Centre, the site is suitable for zoning, in sequential terms, based on the housing targets allocated to Ballysadare.*

4.32 *RPO 3.7.39 is to ensure that at least 40% of new residential and employment-related development in the Regional Growth Centre occurs within Sligo’s existing built-up urban area, through regeneration and consolidation on infill and brownfield sites. Very much like the CSO settlement boundaries, this target of 40% of new development within the existing built up area does not act to preclude zoning or development outside of the built up area.*

4.33 *RPO 5.14 is to “support the conservation of the region’s National Monuments and built heritage, being structures that are of special architectural, historic, archaeological, artistic, cultural, scientific, social or technical interest that are of Regional Significance or above”. There are no known impediments to the zoning of the site in terms of conserving and enhancing the rich qualities of natural and cultural heritage of Ireland in a manner appropriate to their significance.*

Submission 66

<https://consult.sligococo.ie/en/submission/slg-c57-66>

Author: [Carty Contractors](#)

The submission expresses support for the zoning of the lands subject to PAZ-57 as New Residential (nRES) for the following reasons:

- There is a current planning application submitted for this site.
- There is an urgent need for housing to be provided in Strandhill.
- The site is situated in the village core and is *“sequentially preferable over all the currently zoned residential lands in Strandhill”*.
- The site is a serviced site and identified as a Tier 1 site in the CDP Infrastructural Assessment.

The submission notes that the site was previously zoned residential, from 2003 to 2013. The lands were placed in SLR *“as a short-term measure”* due to the 2008 economic downturn.

Submission 67

<https://consult.sligococo.ie/en/submission/slg-c57-67>

Author: [Cathal O'Connor David McMunn](#)

This submission, prepared by consultant Robert Keran on behalf of Cathal O'Connor and David McMunn, is one of six with similar contents. **Submission 67** consists of three parts and an Appendix, as follows:

1. Introduction
 2. Background and context
 3. Grounds of submission
- Appendix 1 – Copy of Draft Direction

In essence, the submission supports the retention of Business, Industry, Enterprise (BIE) zoning for the lands subject to PAZ-44. This is stated clearly at the end of the submission, in Subsection 3.11:

"it is submitted that it is entirely appropriate that the subject site, with an existing, established and ongoing commercial use, be zoned BIE to reflect the existing use".

Below is a **summary of the views** expressed in this submission (as required by Section 31(9) of the Planning and Development Act 2000, as amended), as well as further details of the points made by the consultant.

Section 1 indicates that the submission is made on behalf of Cathal O'Connor and David McMunn, Beldare House, Harmony Hill, Sligo, Co. Sligo, in relation to *"a site identified as PAZ-44 in the material amendments to the Draft Sligo County Development Plan, located to the west of Ballysadare and to the south of and adjoining the N59"*.

Section 2 refers to a previous submission (on the Draft CDP 2024-2030) made by McCutcheon Halley Planning Consultants on behalf of Cathal O'Connor and David Mc Munn, seeking a zoning amendment which was eventually adopted in the final CDP. The Draft Direction requests that the lands subject to PAZ-44 revert to Green Belt (GB) zoning.

Section 3 states that the subject site contains an existing commercial operation, and that the Minister does not appear to be aware of this. The consultant argues in favour of retaining the BIE zoning of the site in the following manner:

- 3.3 *It is also verging on baffling that the Draft Direction seeks a Green Belt zoning on this site where there is, in addition to an established commercial use, an extant planning permission under Reg. Ref: 20/403 (granted by Sligo County Council in March 2021) for development comprising of the construction of 2 no. warehousing units totalling 1,363 sq.m.*
- 3.4 *The Green Belt zoning objective seeks to: "Contain and consolidate settlements, while safeguarding lands for their future expansion and for the provision of strategic infrastructure." Chapter 10 of the Draft Plan further indicates that Green Belt lands shall principally be used for agriculture. The existing commercial use of the site can make no contribution whatsoever to the green belt objectives, and to the contrary, would simply erode the strength and merits of the green belt zoning.*
- 3.5 *If the subject site were to be zoned Green Belt, it is as illogical as an existing housing estate being zoned Green Belt.*

- 3.6 It is noted that the OPR Recommendation to the Minister, of the 27th October 2024, recommended that the subject lands be zoned Green Belt, and cited the following reasons:
- “section 10(2)(n) of the Planning and Development Act 2000, as amended, concerning the promotion of sustainable settlement and transport strategies and associated mandatory targets for greenhouse gas emissions reduction targets under the Climate Action and Low Carbon Development Act, 2015;
 - RPO 3.7.39 compact growth for employment for Sligo Regional Growth Centre
 - NPO 74 and the National Sustainable Outcome and Regional Growth Ambition for compact growth;
 - NPO 72a-c and associated NPF Appendix 3, tiered approach to zoning;
 - the infrastructural assessment and settlement capacity audit in Appendix A of the Draft Sligo County Development Plan 2023-2029;
 - the Development Plans, Guidelines for Planning Authorities (2022) in respect of the policy and objective under section 6.2.1 for zoning to be informed by the settlement capacity audit, and the provisions for the sequential approach to zoning; and
- 3.7 the Strategic Environmental Assessment Addendum and the Strategic Flood Risk Assessment”.
- 3.8 Again, there is no recognition of an existing commercial use on the site. In fact, none of the above provisions are appropriate considerations in the context of the existing established use. The BIE zoning would not contribute to new/additional lands being zoned for BIE and as such concerns relating to quantum of zoned land and compact growth, for example, do not apply in this instance.
- 3.9 Section 1.6 of the Development Plan Guidelines for Planning Authorities (2022) advocate for:
- “Planning from an Evidence Base and Monitoring the Outcomes*
- An approach that emphasises establishing a clear evidence base at the outset of the plan-making exercise is paramount – this must set out a robust and consistent process for a development plan that consists of:*
- 1) A clear and transparent analysis of an existing baseline of plan-related information with a focus on an examination of the effectiveness of previous plans in achieving their stated objectives, including analysis of environmental monitoring data required under the SEA Directive . . .”*
- 3.10 It is clear that the evidence base for the existing land use on the subject site is not correct.
- 3.11 We would further note that the placing of 4.11 ha of BIE zoned lands in Ballysadare into SLR as per PAZ 46 now leaves no BIE zoning for development in Ballysadare.
- 3.12 Having regard to all of the above, it is submitted that it is entirely appropriate that the subject site, with an existing, established and ongoing commercial use, be zoned BIE to reflect the existing use.
- Access from National Road**
- 3.13 It is noted that there appears to be concern that the zoning of this site for BIE may give rise to a new access to the national road, and give rise to concern in relation to conflict with the provisions of Section 2.5 of the Section 28 Ministerial Guidelines ‘Spatial Planning and National Roads Guidelines for Planning Authorities’ (2012).
- 3.14 As clarified above, the use is existing and as such the access is existing. The zoning will not change this in any way. The TII submissions also do not recognise the extant planning permission on this site, as referred to earlier.

Submission 68

<https://consult.sligococo.ie/en/submission/slg-c57-68>

Author: [Patrick Carty](#)

The submission expresses support for the zoning of the lands subject of PAZ-57 as New Residential (nRES) for the following reasons:

- There is a current planning application submitted for this site.
- There is an urgent need for housing to be provided in Strandhill.
- The site is situated in the village core and is *“sequentially preferable over all the currently zoned residential lands in Strandhill”*.
- The site is a serviced site and identified as a Tier 1 site in the CDP Infrastructural Assessment.

The submission notes that the site was previously zoned residential from 2003 to 2013. The lands were placed in SLR *“as a short-term measure”* due to the 2008 economic downturn.

Submission 69

<https://consult.sligococo.ie/en/submission/slg-c57-69>

Author: [Karl Hannon](#)

The submission expresses support for the zoning of the lands subject of PAZ-57 as New Residential (nRES) for the following reasons:

- There is a current planning application submitted for this site.
- There is an urgent need for housing to be provided in Strandhill.
- The site is situated in the village core and is *“sequentially preferable over all the currently zoned residential lands in Strandhill”*.
- The site is a serviced site and identified as a Tier 1 site in the CDP Infrastructural Assessment.

The submission notes that the site was previously zoned residential, from 2003 to 2013. The lands were placed in SLR *“as a short-term measure”* due to the 2008 economic downturn.

Submission 70

<https://consult.sligococo.ie/en/submission/slg-c57-70>

Author: [Beldare Homes](#)

This submission, prepared by consultant Robert Keran on behalf of Beldare Homes, is one of six with similar contents. **Submission 70** consists of four parts and an Appendix, as follows:

1. Introduction
 2. Basis for and structure of submission
 3. Relevant national and regional planning policy
 4. Lands at Golf Course Road, Strandhill
- Appendix 1 – Copy of Draft Direction

In essence, the submission supports the retention of New Residential (nRES) zoning for the lands subject to PAZ-57. This is stated clearly at the end of the submission, in Subsection 4.28:

“ ... in accordance with Section 10(2)(n) of the Planning and Development Act 2000, as amended, the zoning of the site at Golf Course Road for residential purposes is considered to be fully in accordance with the national and regional planning policy, the Development Plan Guidelines for Planning Authorities and the principles of proper planning and sustainable development”.

Below is a **summary of the views** expressed in this submission (as required by Section 31(9) of the Planning and Development Act 2000, as amended), as well as further details of the points made by the consultant.

Section 1 indicates that the submission is made on behalf of Beldare Homes and its subsidiary companies, including Altitude Distribution Ltd. Beldare Homes is described as a *“large scale residential developer based in the north-west of Ireland and operating at a nationwide reach”*.

The consultant further indicates that Altitude Distribution Ltd. has been granted leave for judicial review of *“certain elements of the Sligo County Development Plan 2024–2030”*.

Section 2 indicates that this submission relates to *“a site at Golf Course Road”* and that a separate submission has been made *“by Beldare Homes and subsidiary companies including Altitude Distribution Ltd.”* in relation to *“Systemic Procedural errors in the making of the Sligo County Development Plan 2024–2030, Material errors in the Core Strategy of the Sligo County Development Plan 2024–2023 and Incorrect Application of the Settlement Capacity Audit”*. A summary of that submission is included.

[Please refer to the summary of **Submission 82**, which is the separate submission mentioned above.]

Section 3 of the submission lists and quotes from relevant national and regional planning policy documents, as they are referred to in the Draft Direction:

- Section 10(2)(n) of the Planning and Development Act 2000 (as amended);
- NPO 3(c) NPO 18(a), NPO 60, NPO 72(a)-(c) of the National Planning Framework;
- RPO 3.2(b), RPO 3.7.39, RPO 5.14 of the Regional Spatial and Economic Strategy;
- Section 6.2.3 of the Development Plan Guidelines for Planning Authorities (2022).

Section 4 is titled “*Lands at Golf Course Road, Strandhill*” and seeks to demonstrate that “*the site is sequentially preferable, serviced or capable of being serviced, and within or appropriate to be within the settlement boundary, would not adversely affect natural or cultural heritage*”.

- **Subsection 4.3** states the consultant’s opinion that the CSO settlement boundaries have no relevance to decision-making “*in terms of the preferred location of the zoning of land*”, because NPO 3(a) does not preclude consideration of such lands.
- **Subsection 4.4** reiterates the consultant’s opinion that the CDP “*significantly under-estimates the quantum of zoned land that is required for residential purposes*”.
- **Subsection 4.7** indicates that “*the site is assessed under the following headings*:
 - *Draft Ministerial Direction relating to the site*
 - *Outline Description of Site and Site Location*
 - *Planning History*
 - *Compliance with Sequential Approach in the Development Plan Guidelines (Section 6.2.3)*
 - *Infrastructure Assessment*
 - *Summary of compliance with national and regional objectives*”
- **Subsections 4.11 to 4.13** describe the location, topography and several features of the site and its immediate environs.
- **Subsections 4.14 and 4.15** remind that the site was included in the Strategic Land Reserve as part of the CDP 207-2023 (Strandhill Mini-Plan), but it was not proposed to be zoned in the Draft CDP 2024-2030, where it was identified as Tier 1 in the Infrastructural Assessment and scored 20 points in the Settlement Capacity Audit.
- **Subsection 4.16** notes that a planning application for 99 houses on the site, refused by Sligo County Council (24/60191), is under appeal to ABP (ABP-320594-24).
- **Subsections 4.17 to 4.26** include the consultant’s assessment of the site, in the following manner:

Compliance with Sequential Approach in the Development Plan Guidelines (Section 6.2.3)

- 4.17 *It should be noted that in the context of housing delivery, between 2017 and 2024 only 44 residential units were completed in Strandhill and that the lands zoned for residential development failed to deliver any new units in the 7 year lifetime of the plan.*
- 4.18 *The application of the arbitrary and unnecessary scoring system in the Settlement Capacity Audit then resulted in the site not being zoned.*
- 4.19 *The Golf Course Road site has a real and identifiable prospect of providing sustainable residential development in the near term, and in the context of the urgent need to increase housing supply.*
- 4.20 *The site scored 20 points in the SCA. However, as set out previously, the SCA carried out by Sligo County Council for settlements other than Sligo town provides an extremely limited, and it is submitted, unfair, set of criterion, and importantly excludes any criteria relating to access to social infrastructure. The SCA table for Strandhill is below. The Golf Course Road site, Site 10, is highlighted.*

		"Spatially sequential" test (max. 20 points)	Planning and environmental status (max. 50 points)			Total score (max. 70 points)
IA Site No.	Compact Growth designation	Proximity to Town Centre	Designation in HDAP or RSES	Flood Risk	Planning History	Total points
2	SCS-02	15	30	10	0	40
1	SCS-01	10	0	10	10	30
3	SCS-03	15	0	10	5	30
4	SCS-04	15	0	10	5	30
5	SCS-05	15	0	10	5	30
6	SCS-06	15	0	10	0	25
7	AP-01	10	0	10	5	25
8	AP-02	10	0	10	0	20
9	SLR-01	15	0	10	5	30
10	SLR-02	10	0	10	0	20
11	SLR-03	15	0	10	0	25
12	TOU-01	15	n/a	10	5	30
13	TOU-02	10	n/a	10	20	30
PAZ-54	n/a	10	0	10	0	20
PAZ-86	n/a	10	0	10	0	20

4.21 The following points are of significant concern relating to the SCA for Strandhill and the Golf Course Road site in particular:

- The fact that the site at Golf Course Road is located immediately adjacent to a school is ignored.
- Neither is the location directly adjacent to a golf club, which is a recreation/sports facility, taken into account.
- Site 2, a local authority owned site, and located HDAP or RSES. In this instance, the site is designated in the HDAP. An allocation of 30 points for this reason completely skews the scoring, and has no decision under the Development Plan Guidelines. As an aside, the total points for Site 2 at 40 points is an error. Based on the scoring allocated, it should be 15 plus 30 plus 10 = 55 points.
- If the 'centre' of Strandhill is taken as where Shore Road meets the coast, the site is a 12 minute (850 metre) walking distance from this point. By comparison, sites 2, 7 and 8 (grouped, and to the east of Strandhill) and Site 13 (located to the north adjacent to Sligo Airport), are 18 minutes and 1.2km. All sites scored higher in the SCA than Site 10, with the exception of Site 8 which scored the same 20 points but nonetheless has been zoned for residential purposes and not challenged in the Draft Direction. It is entirely illogical that Site 2, located adjoining Site 10, should score 5 more points in terms of proximity to town centre.
- We also wish to draw attention to PAZ-56, a site of some 1.6 acres zoned as residential in the County Development Plan. The Infrastructural Assessment in the adopted County

Development Plan identifies this site as ‘not serviced’. There is no SCA carried out for this site. It is mapped outside the settlement limit of Strandhill. It is more distant from the village centre than the Golf Course Road site. Yet the Draft Direction does not seek the omission of this zoning. This clearly shows that there are inconsistencies and exemptions in relation to a strict application of the approach to zoning.

- *The absence of any environmental criteria means that other sites which have been zoned may not be suitable for development and this has not been examined in any way. The Golf Course Road site was subject to extensive environmental and ecological investigations during the course of the preparation and lodgement of the recent planning application and there was no reason for refusal relating to such matters. The site is therefore demonstrably suitable for development in environmental and ecological terms, however no such evidence has been available or has been sought for other sites under consideration for zoning.*
- 4.22 *The fact of the matter is that the characteristics of the Golf Course Road site are:*
- *Designated Tier 1 in the Infrastructure Assessment.*
 - *The site is within easy walking and cycling distance of Strandhill village centre.*
 - *Directly adjacent to a school*
 - *No identified flood risk or other environmental or ecological constraints.*
 - *Has a live planning application currently under consideration by An Bord Pleanála, and it located directly adjoining a site being pursued for a Section 179A housing scheme by Sligo County Council.*
- 4.23 *Based on the facts set out above, it is entirely illogical that the Golf Course Road site should not be zoned for residential development under any objective assessment and having regard to the policy requirements.*
- 4.24 *The OPR Recommendation of the 27th October 2024 stated the following at Page 28 in relation to the site:*
- “The subject lands are located outside of the CSO settlement boundary, and leapfrog extensive undeveloped residential zoned land, including Strategic Land Reserve, closer to the village centre”.*
- 4.25 *The suggestion that this site leapfrogs other sites is clearly inaccurate and there is significant concern that the OPR assessment above may be based on what is considered to be a SCA which does not use the correct criteria. In relation to the subject sites proximity to the village centre, as stated above:*
- *If the ‘centre’ of Strandhill is taken as where Shore Road meets the coast, the site is a 12 minute (850 metre) walking distance from this point.*
 - *By comparison, sites 2, 7 and 8 (grouped, and to the east of Strandhill) and Site 13 (located to the north adjacent to Sligo Airport), are 18 minutes and 1.2km. All sites scored higher in the SCA than Site 10, with the exception of Site 8 which scored the same 20 points but nonetheless has been zoned for residential purposes and not challenged in the Draft Direction.*
 - *It is entirely illogical that Site 2, located adjoining Site 10, should score 5 more points in terms of proximity to town centre.*

Infrastructure Assessment

- 4.26 *The Infrastructural Assessment identified the subject site as a ‘Tier 1’ site, indicating that the site is serviced.*

- **Subsection 4.23** attempts to summarise the compliance with national and regional planning objectives, in the following manner:

- *NPO 3c – the zoning at Golf Course Road would not be contrary to the objective to deliver at least 30% of all new homes in settlements other than the five Cities and their suburbs, within their existing built-up footprints. The zoning of the site at Golf Course Road, whilst outside the CSO settlement boundary of Strandhill, has been shown to be sequentially suitable. As a matter of record, many other sites that have been zoned in Strandhill (e.g. Site 2) and not challenged in the Draft Direction, are located outside the CSO defined settlement boundary.*
- *NPO 18a – the zoning at Golf Course Road would not be contrary to the objective to support the proportionate growth of and appropriately designed development in rural towns that will contribute to their regeneration and renewal, including interventions in the public realm, the provision of amenities, the acquisition of sites and the provision of services. The zoning would allow for the delivery of new homes with supporting social infrastructure in a sustainable location in Strandhill.*
- *NPO 60 – there are no known impediments to the zoning of the site in terms of conserving and enhancing the rich qualities of natural and cultural heritage of Ireland in a manner appropriate to their significance.*
- *NPO 72c – it has been demonstrated that the Golf Course Road lands are serviced (Tier 1) and as such are not lands which “cannot be serviced within the life of the relevant plan, such lands should not be zoned for development”.*
- *RPO 3.2(b) – is to “Deliver at least 40% of all new housing targeted in the Regional Growth Centres, within the existing built-up footprint”. Whilst Strandhill is not a Regional Growth Centre, the site is suitable for zoning, in sequential terms, based on the housing targets allocated to Strandhill.*
- *RPO 3.7.39 is to ensure that at least 40% of new residential and employment-related development in the Regional Growth Centre occurs within Sligo’s existing built-up urban area, through regeneration and consolidation on infill and brownfield sites. Very much like the CSO settlement boundaries, this target of 40% of new development within the existing built up area does not act to preclude zoning or development outside of the built up area.*
- *RPO 5.14 is to “support the conservation of the region’s National Monuments and built heritage, being structures that are of special architectural, historic, archaeological, artistic, cultural, scientific, social or technical interest that are of Regional Significance or above”. There are no known impediments to the zoning of the site in terms of conserving and enhancing the rich qualities of natural and cultural heritage of Ireland in a manner appropriate to their significance.*

Submission 71

<https://consult.sligococo.ie/en/submission/slg-c57-71>

Author: [Strandhill Golf Club](#)

Strandhill Golf Club supports the Draft Direction regarding PAZ-57, to revert the zoning to Strategic Land Reserve (SLR) from New Residential (nRES).

The Club is not opposed to the planned sustainable growth of Strandhill, but it has serious concerns about the excessive additional residential zoning and the resulting substantial negative impact on the Golf Club and its development, in the absence of necessary infrastructure.

These concerns can be summarised as follows:

- Golf Course Road is substandard and would require significant upgrading in order to accommodate the traffic generated by development on lands subject to PAZ-57.
- Large-scale residential development in the Club's immediate surrounds would provide further restrictions and constraints to the development of the golf course.
- The Club is deeply concerned about the detrimental impact on the safe operation of the golf course from increased numbers of pedestrians and visitors using Golf Course Road and traversing the course.
- Neither the Strandhill wastewater treatment plant, nor existing social and community facilities in the village are sufficient to cater for the population increases arising from the proposed amendments.
- The necessary physical, social and community infrastructure is not in place to support the excessive housing growth resulting from the zoning amendments.

The material alterations made to the Plan would *"individually and cumulatively encourage a pattern of development in particular locations, which is inconsistent with the core strategy of the County Development Plan"*.

Applying the new density range (introduced by PA-8) will automatically increase the development yield for Strandhill. It follows that no additional residential zoning is required to meet the unchanged projected housing demand at Strandhill.

"It is the Club's position that any plan to dramatically increase the residential zoning and housing targets for Strandhill must be plan led, include input from and engagement with all relevant Strandhill stakeholders and provide detailed proposal to address infrastructure deficiencies."

The Club asks the Minister for Housing, Heritage and Local Government *"to direct Sligo County Council to reject PAZ 57 and revert the zoning on the lands from New Residential (nRES) to Strategic Land Reserve (SLR)"*.

Submission 72

<https://consult.sligococo.ie/en/submission/slg-c57-72>

Author: [Beldare Homes](#)

This submission, prepared by consultant Robert Keran on behalf of Beldare Homes, is one of six with similar contents. **Submission 72** consists of four parts and an Appendix, as follows:

1. Introduction
 2. Basis for and structure of submission
 3. Relevant national and regional planning policy
 4. Lands at Cairns Hill, Sligo
- Appendix 1 – Copy of Draft Direction

In essence, the submission supports the retention of New Residential (nRES) zoning for the lands subject to PAZ-12. This is stated explicitly at the end of the submission, in Subsection 4.23:

“ ... in accordance with Section 10(2)(n) of the Planning and Development Act 2000, as amended, the zoning of the site at Cairn’s Hill for residential purposes is considered to be fully in accordance with the national and regional planning policy, the Development Plan Guidelines for Planning Authorities and the principles of proper planning and sustainable development”.

Below is a **summary of the views** expressed in this submission (as required by Section 31(9) of the Planning and Development Act 2000, as amended), as well as further details of the points made by the consultant.

Section 1 indicates that the submission is made on behalf of Beldare Homes and its subsidiary companies, including Altitude Distribution Ltd. Beldare Homes, which is described as a *“large scale residential developer based in the north-west of Ireland and operating at a nationwide reach”*.

The consultant further indicates that Altitude Distribution Ltd. has been granted leave for judicial review of “certain elements of the Sligo County Development Plan 2024–2030”.

Section 2 indicates that this submission relates to *“a site at Cairn’s Hill”* and that a separate submission has been made *“by Beldare Homes and subsidiary companies including Altitude Distribution Ltd.”* in relation to *“Systemic Procedural errors in the making of the Sligo County Development Plan 2024–2030, Material errors in the Core Strategy of the Sligo County Development Plan 2024–2023 and Incorrect Application of the Settlement Capacity Audit”*. A summary of that submission is included.

[Please refer to the summary of **Submission 82**, which is the separate submission mentioned above.]

Section 3 of the submission lists and quotes from relevant national and regional planning policy documents, as they are referred to in the Draft Direction:






- Section 10(2)(n) of the Planning and Development Act 2000 (as amended);
- NPO 3(c) NPO 18(a), NPO 60, NPO 72(a)-(c) of the National Planning Framework;
- RPO 3.2(b), RPO 3.7.39, RPO 5.14 of the Regional Spatial and Economic Strategy;
- Section 6.2.3 of the Development Plan Guidelines for Planning Authorities (2022).

Section 4 is titled “*Lands at Cairn’s Hill, Sligo Co. Sligo*” and seeks to demonstrate that “*the site is sequentially preferable, serviced or capable of being serviced, and within or appropriate to be within the settlement boundary, would not adversely affect natural or cultural heritage*”.

- **Subsection 4.3** states the consultant’s opinion that the CSO settlement boundaries have no relevance to decision making “*in terms of the preferred location of the zoning of land*”, because NPO 3(a) does not preclude consideration of such lands.
- **Subsection 4.4** reiterates the consultant’s opinion that the CDP “*significantly under-estimates the quantum of zoned land that is required for residential purposes*”.
- **Subsection 4.7** indicates that “*the site is assessed under the following headings*:
 - *Draft Ministerial Direction relating to the site*
 - *Outline Description of Site and Site Location*
 - *Infrastructure Assessment and compliance with Sequential Approach in the Development Plan Guidelines (Section 6.2.3)*
 - *Infrastructure Assessment*
 - *Summary of compliance with national and regional objectives*”
- **Subsections 4.11 to 4.14** describe the amenities accessible from the site’s location, as well as the available transport infrastructure.
- **Subsections 4.16 to 4.21** include the consultant’s assessment of the site, in the following manner:

Infrastructure Assessment and Compliance with Sequential Approach in the Development Plan Guidelines (Section 6.2.3)

The site is identified as Tier 1 (serviced in the Infrastructural Assessment’ included in the adopted County Development Plan – see extract below.

IA Site No.	Access to watermains	Access to foul sewer	Access to surface water drainage system	Access to public road(s)	Footpath present	Cycle lane present	Tier
PAZ-12							1

4.16 The subject site is adjacent to Site 16 and equivalent to same in terms of location, proximity, and planning status. Yes, the SCA carried out by Sligo County Council scores Site 16 at 80 points and PAZ-12 at 58 points. There are a number of anomalies the most glaring of which is that for ‘Contribution to Consolidation’, Site 16 scores 20 but PAZ-12 only 5, despite being almost across the road from Site 16.

4.17 The site is inherently suitable for development and the following is noted in this respect:

- This area of Sligo Town’s environs has a diversity of uses including community infrastructure and residential amenities in the vicinity. The large Sligo Retail Centre, a Neighbourhood Centre, General Practitioner’s Office, primary school and creche, ample recreational areas, and services including bus links to the Sligo Town centre.
- The site is entirely suitable for development of residential units given the subject lands’ proximity to the residential amenities and facilities, including childcare and education, established residential development, retail and transport links.

- OPW Catchment Flood Risk Assessment and flood mapping with the County Development Plan reveals that there is no identified floor risk on the site.
- 4.18 There are no protected structures or sites listed in the Record of Monuments and Places (RMP) as listed by the National Monuments Service located within the subject lands' boundary³. There is a ringfort approximately 18 metres from the subject lands, buffered by the Cairns Road (Rec. No: SL014-230) as well as a megalithic passage tomb (Record No: SL014-231) 280m to the northwest. The subject lands referred to in this submission are both reasonably distanced and well separated from these features, and the subject site is significantly lower than the Cairn and as such any build development on the subject site would not interfere with a line of site between the monuments. ,
- 4.19 Having regard to the above, the site, if it had been included, would have scored well under the Settlement Capacity Audit (SCA).
- 4.20 Following from the above, the table below represents an assessment of the site using the Settlement Capacity Audit (SCA) criteria used by Sligo County Council. Whilst it is not accepted that this scoring system is the correct approach to the SCA, where it is applied to the site, the site performs very strongly.

	Spatially Sequential test (max. 60 points)			Availability of social infrastructure (max. 40 points)				Planning and environmental status (max. 50 points)			
IA Site	Location (Distance from town centre)	Contribution to consolidation (compact growth)	Access to public transport	Proximity to primary school	Proximity to grocery shop	Proximity to pharmacy	Proximity to recreational area of public open space	Designation in HDAP or RSES	Flood Risk	Planning History	Total Points
Cairn's Hill	0	20	20	4	8	6	2	0	10	10	80

- 4.21 The 80 points would place this site at 19th place, along with three other sites at 80 points, in the SCA for Sligo Town and the site would therefore merit zoning above those placed lower than it, of which there are 10 no, not including the other three sites at 80 points.
- **Subsection 4.22** attempts to summarise the compliance with national and regional planning objectives, in the following manner:
- NPO 3c – the zoning at this site at Cairn's Hill would not be contrary to the objective to deliver at least 30% of all new homes in settlements other than the five Cities and their suburbs, within their existing built-up footprints. Whilst partly outside the 2022 CSO settlement boundary of Sligo town, the zoning has been shown to be sequentially suitable.
 - NPO 18a – the zoning at Cairn's Hill would not be contrary to the objective to support the proportionate growth of and appropriately designed development in rural towns that will contribute to their regeneration and renewal, including interventions in the public realm, the provision of amenities, the acquisition of sites and the provision of services. The zoning would allow for the delivery of new homes with supporting social infrastructure in a sustainable location at Cairn's Hill.
 - NPO 60 – there are no known impediments to the zoning of the site in terms of conserving and enhancing the rich qualities of natural and cultural heritage of Ireland in a manner appropriate to their significance.
 - NPO 72c – it has been demonstrated that the Cairn's Hill lands are serviced (Tier 1) and as such are not lands which "cannot be serviced within the life of the relevant plan, such lands should not be zoned for development".

- *RPO 3.2(b) – is to “Deliver at least 40% of all new housing targeted in the Regional Growth Centres, within the existing built-up footprint”. Sligo is identified as a Regional Growth Centre in the RSES and the site at Cairn’s Hill is suitable for zoning, in sequential terms, based on the correct housing targets allocated to Sligo.*
- *RPO 3.7.39 is to ensure that at least 40% of new residential and employment-related development in the Regional Growth Centre occurs within Sligo’s existing built-up urban area, through regeneration and consolidation on infill and brownfield sites. Very much like the CSO settlement boundaries, this target of 40% of new development within the existing built up area does not act to preclude zoning or development outside of the built up area.*
- *RPO 5.14 is to “support the conservation of the region’s National Monuments and built heritage, being structures that are of special architectural, historic, archaeological, artistic, cultural, scientific, social or technical interest that are of Regional Significance or above”. There are no known impediments to the zoning of the site in terms of conserving and enhancing the rich qualities of natural and cultural heritage of Ireland in a manner appropriate to their significance.*

Submission 73

<https://consult.sligococo.ie/en/submission/slg-c57-73>

Author: [Uisce Éireann - Irish Water](#)

Uisce Éireann welcomes the Draft Ministerial Direction, indicating that its previous submission (at Proposed Amendments stage) questioned the need for additional zoned land, especially where the UÉ networks would likely necessitate strategic upgrades (not just individual site servicing) if such lands were to be fully developed.

The submission states that *“a more focused approach would assist in forward planning for future infrastructure needs, optimise existing assets, minimise investment required and support the principle of compact growth”*.

In addition to previous commentary (provided at Proposed Amendments stage), UÉ advises the following:

- PAZ-11: network extensions greater than 150 m may be required to service the site, based on connection via the existing access on Hollywell Road at the south-eastern extent of the site.

An alternative potential connection point would be to the networks on Tonaphubble Lane, but this may require third party permissions. An upgrade of the existing sewer network, over a distance of approximately 180 m, is also likely to be required.

- PAZ-14 and PAZ-15 – additional details:
 - Upgrade of existing AC watermain over a length of almost 900 m required to cater for PAZ-14.
 - Nearest sewer network is approximately 1.2 km from the site. Connection is likely to be via pumped rising main and/or gravity sewer. On-site storage may also be required to mitigate impacts on downstream network.
 - These works are not included in UÉ’s Investment Plan and must be developer funded. Exact requirements for connection are normally determined at Connection Application stage. New connections to Uisce Éireann networks are subject to the Connections Charging Policy.
 - Further phases of development may necessitate strategic upgrades.
- PAZ-45: there is a sewer in the field to the east approximately 40 m from the site, but third-party permissions may be required. To connect to the network via the public road, an extension of at least 160 m would be required.
- PAZ-63: The potential for servicing Site PAZ-63 has now been reviewed in further detail:
 - An extension of approximately 90 m from the site along the road would be required to the site entrance shown on the zoning map.
 - A potential alternative would be to connect via the adjacent estate to the south-west of the site with a shorter extension, but this may require third-party permissions.
 - Development in areas at risk of flooding increase the level of complexity and the cost providing water services.
 - Water supply in this area as it is provided by a private Group Water Scheme, Corrick GWS).
- PAZ-76 – additional details:
 - A long network extension (greater than 150 m) may be required to connect to the sewer in the village core.
 - A potential alternative would be to connect to the Curry pumping station, but this would require a river crossing into the pumping station. An upgrade of the station would likely be required to cater for full development of the site.

- PAZ-80 – additional details:
 - Likely connection would be to the Gurteen View WWPS, approximately 60 m from PAZ-80, via the road (river crossing required).
 - The reference to third-party permissions potentially being required was related to ownership of the Gurteen View WWPS, but UÉ can now confirm that the WWPS is UÉ owned.
- PAZ-31 and PAZ-34 – additional details:
 - To the south of the town, available information indicates the UÉ sewer network extends only as far as the 'Linx' estate.

[Note – The correct name is “the Links Estate”, not the “Linx estate”]

Submission 74

<https://consult.sligococo.ie/en/submission/slg-c57-74>

Author: [Kathleen Gallagher](#)

The submission expresses support for the zoning of the lands subject of PAZ-57 as New Residential (nRES) for the following reasons:

- There is a current planning application submitted for this site.
- There is an urgent need for housing to be provided in Strandhill.
- The site is situated in the village core and is *“sequentially preferable over all the currently zoned residential lands in Strandhill”*
- The site is a serviced site and identified as a Tier 1 site in the CDP Infrastructural Assessment.

The submission notes that the site was previously zoned residential, from 2003 to 2013. The lands were placed in SLR *“as a short-term measure”* due to the 2008 economic downturn.

Submission 75

<https://consult.sligococo.ie/en/submission/slg-c57-75>

Author: [Ann Marie Gavin](#)

The submission expresses support for the zoning of the lands subject of PAZ-57 as New Residential (nRES) for the following reasons:

- There is a current planning application submitted for this site.
- There is an urgent need for housing to be provided in Strandhill.
- The site is situated in the village core and is *“sequentially preferable over all the currently zoned residential lands in Strandhill”*
- The site is a serviced site and identified as a Tier 1 site in the CDP Infrastructural Assessment.

The submission notes that the site was previously zoned residential, from 2003 to 2013. The lands were placed in SLR *“as a short-term measure”* due to the 2008 economic downturn.

Submission 76

<https://consult.sligococo.ie/en/submission/slg-c57-76>

Author: [Niall Carty](#)

The submission expresses support for the zoning of the lands subject of PAZ-57 as New Residential (nRES) for the following reasons:

- There is a current planning application submitted for this site.
- There is an urgent need for housing to be provided in Strandhill.
- The site is situated in the village core and is *“sequentially preferable over all the currently zoned residential lands in Strandhill”*.
- The site is a serviced site and identified as a Tier 1 site in the CDP Infrastructural Assessment.

The submission notes that the site was previously zoned residential, from 2003 to 2013. The lands were placed in SLR *“as a short-term measure”* due to the 2008 economic downturn.

Submission 77

<https://consult.sligococo.ie/en/submission/slg-c57-77>

Author: [Ocean Links Residents Association](#)

This submission, which relates to PAZ-57, is summarised below as follows:

- The Residents' Association has concerns relating to potential overdevelopment of Strandhill, traffic safety at the junction of the Golf Course Road and Shore Road, inadequate infrastructure/amenities and a lack of community and social services.
- The submission supports the recommendation of the OPR and the Minister, that PAZ-57 should revert to Strategic Land Reserve from New Residential.
- The Residents Association notes that there is a *"sufficient amount of undeveloped zoned New Residential land within the village without the need to activate the Strategic Land Reserve areas"*.
- Future development/expansion in Strandhill *"must go hand in hand with appropriate upgrades in village infrastructure, amenities and environmental considerations"*.

Submission 78

<https://consult.sligococo.ie/en/submission/slg-c57-78>

Author: [Ronan Smyth](#)

This submission notes that the Minister's draft direction *"affects over 20 zoning objectives in the draft County Development Plan, resulting in the removal of approximately 70 hectares"*.

The main points of the submission are as follows:

- The majority of the rezoning objectives in Strandhill village, specifically PAZ-57 and PAZ-58, *"do not present an overall strategy for the proper planning and sustainable development of the village"*.
- The intervention of the Office of the Planning Regulator and the Minister of State for Local Government is welcome.
- The Chief Planner and the Chief Executive of Sligo County Council are urged to *"seek further direction from the Minister for Local Government regarding the removal of planning objective PAZ 58 from the Sligo County Development Plan 2024-2030"*.
- Strandhill requires a comprehensive masterplan that promotes *"integrated thinking rather than disparate individual land use plans that cater only to vested interests, potentially neglecting community needs and the principles of proper planning and sustainable development"*.
- Sligo County Council is *"encouraged"* to engage with the community to *"collaboratively master plan the future of the village"*.

Submission 79

<https://consult.sligococo.ie/en/submission/slg-c57-79>

Author: [Beldare Homes](#)

This submission, prepared by consultant Robert Keran on behalf of Beldare Homes, is one of six with similar contents. **Submission 79** consists of four parts and seven Appendices, as follows:

1. Introduction
2. Basis for and structure of submission
3. Relevant national and regional planning policy
4. Grounds of submission
 - Appendix 1 – Copy of Draft Direction
 - Appendix 2 – Uisce Éireann confirmation of feasibility
 - Appendix 3 – Site-specific Floor Risk Assessment
 - Appendix 4 – SCA assessment of Hazelwood lands
 - Appendix 5 – GAA letter of support
 - Appendix 6 – Sligo Chamber letter of support
 - Appendix 7 – Sustainability assessment

In essence, the submission supports the retention of New Residential (nRES) zoning for the lands subject to PAZ-14, retention of the Strategic Land Reserve (SLR) designation for the lands subject to PAZ-15 and retention of Open Space (OS) zoning for the lands subject to PAZ-16.

This is stated explicitly at the end of the submission, in Subsection 4.17:

“... in accordance with Section 10(2)(n) of the Planning and Development Act 2000, as amended, the zoning of the site at Hazelwood for residential purposes is considered to be fully in accordance with the national and regional planning policy, the Development Plan Guidelines for Planning Authorities and the principles of proper planning and sustainable development”.

Below is a **summary of the views** expressed in this submission (as required by Section 31(9) of the Planning and Development Act 2000, as amended), as well as further details of the points made by the consultant.

Section 1 indicates that the submission is made on behalf of Beldare Homes and its subsidiary companies, including Altitude Distribution Ltd. Beldare Homes is described as a “large scale residential developer based in the north-west of Ireland and operating at a nationwide reach”.

The consultant further indicates that Altitude Distribution Ltd. has been granted leave for judicial review of “certain elements of the Sligo County Development Plan 2024–2030”.

Section 2 indicates that this submission relates to “*a site at Hazelwood*” and that a separate submission has been made “*by Beldare Homes and subsidiary companies including Altitude Distribution Ltd.*” in relation to “*Systemic Procedural errors in the making of the Sligo County Development Plan 2024–2030, Material errors in the Core Strategy of the Sligo County Development Plan 2024–2023 and Incorrect Application of the Settlement Capacity Audit*”. A summary of that submission is included.

[Please refer to the summary of **Submission 82**, which is the separate submission mentioned above.]

Section 3 of the submission lists and quotes from relevant national and regional planning policy documents, as they are referred to in the Draft Direction:

- Section 10(2)(n) of the Planning and Development Act 2000 (as amended);
- NPO 3(c) NPO 18(a), NPO 60, NPO 72(a)-(c) of the National Planning Framework;
- RPO 3.2(b), RPO 3.7.39, RPO 5.14 of the Regional Spatial and Economic Strategy;
- Section 6.2.3 of the Development Plan Guidelines for Planning Authorities (2022).

Section 4 presents the “*Grounds of submission*” and seeks to demonstrate that “*the site is sequentially preferable, serviced or capable of being serviced, and within or appropriate to be within the settlement boundary, would not adversely affect natural or cultural heritage*”.

- **Subsection 4.3** states the consultant’s opinion that the CSO settlement boundaries have no relevance to decision making “*in terms of the preferred location of the zoning of land*”, because NPO 3(a) does not preclude consideration of such lands.
- **Subsection 4.4** reiterates the consultant’s opinion that the CDP “*significantly under-estimates the quantum of zoned land that is required for residential purposes*”.
- **Subsection 4.7** indicates that “*the site is assessed under the following headings*”:
 - *Draft Ministerial Direction relating to the site*
 - *Outline Description of Site and Site Location*
 - *Planning History*
 - *Compliance with Sequential Approach in the Development Plan Guidelines (Section 6.2.3)*
 - *Infrastructure Assessment*
 - *Summary of compliance with national and regional objectives*”
- **Subsections 4.12 and 4.13** indicates that “*Planning permission was granted in 2009 for the development of the lands which comprise lands to the north and south (subject to PAZ-14, PAZ-15 and PAZ-16) and zoned SLR in the Sligo County Development Plan) to provide 731 dwellings (Reg. Ref: PL 08/231 and ABP Ref: PL21.232588)*” and that this 10-years permission has lapsed.
- **Subsection 4.14** states that “*a separate planning permission was granted under Reg. Ref: 08/33 (Sligo Borough Council) and An Bord Pleanála Ref: PL77.232589 for residential development on a 1.8 hectare site to the south of the R286 Dromahair Road at Hazelwood Demesne, Hazelwood, Sligo comprising the construction of 58 no. dwelling units and associated works.*”
- **Subsection 4.15** attempts to apply the 4-step sequential approach test suggested in Section 6.2.3 of the Development Plan Guidelines in relation to residential zoning, in the following manner:
 - **Step 1**
A submission of the 22nd December 2023 on behalf of Altitude Distribution Ltd on the Hazelwood lands made the following points in relation to the Infrastructural Assessment (sites 44 and 45 in the Infrastructural Assessment) for that site.
 - *The table in the Infrastructure Assessment assessing sites in Sligo Town indicates that sites 44 and 45 are marked red and are deficient in “Access to foul sewer” and “Cycle lane present”.*
 - *No engagement with the site owners was undertaken as part of this assessment.*
 - *It is considered that the Infrastructure Assessment is incorrect and should be amended to show an amber circle for sites 44 and 45 “Access to foul sewer” and “Cycle lane present”.*

- The site owners are currently engaging with Uisce Éireann and work is underway to agree a strategy by which access to the foul sewer can be provided to both lands.
- The landowners are confident that this can be provided within the lifetime of this Plan and potentially two years from now. The most recent meeting with Uisce Éireann was on 6th December 2023 with representatives from Uisce Éireann's design team, customer liaison management and regional management present.
- In addition, there is a planning requirement for the developers of the Lough Gill Distillery – located to the east of the subject lands - to connect the distillery to the Uisce Éireann Sewerage network (Condition 15 of Reg. Ref: PL 15/296). The developers of the distillery sought to have this condition removed and to deal with wastewater on site but permission was only granted for this on a temporary (6 year) basis (Reg. Ref: PL 18/412). This amendment permission was granted on 16th March 2020 and will expire on 15th March 2025. Therefore, by mid-March 2025, there will be a requirement for a connection from the Lough Gill Distillery to the Uisce Éireann sewage network. The natural route for this connection would be along the R286 but the owners of the subject lands are reviewing potential route options which would bring about efficiency and solutions to sustainably serve both, and other lands in the region.
- For these reasons it is considered that the table in the Infrastructure Assessment should be changed to show an amber circle for "Access to foul sewer" for sites 44 and 45.
- Table 29A of the County Development Plan reproduces Figure 6-8 of the LTP (Local Transport Plan). This shows a planned "Interurban" cycle route along the R286. This is shown in Table 29.5 as Route No. 2: "Cycle link from Sligo Town to St. Angela's College along Hazelwood Road". The proposal is to: "Connect Hazelwood and St. Angela's College to ATU and the east of the Town along the R-286".
- The cycle lane is already in place as far as Elm Park Housing Estate which is only 750m from the site entrance.
- Therefore, while a cycle lane is not present along the R286, there are proposals to provide this in the lifetime of the Plan. Therefore, the Infrastructure Assessment incorrectly marks "Cycle lane present" as red when it should be amber.
- Furthermore, road widening works and provision for upgraded road, footpath and pedestrian access along the R286 was completed some years ago. Additional upgrades can be completed to tie into the works already completed to date.
- The result of the incorrect classification of sites 44 and 45 in terms of "Access to foul sewer" and "Cycle lane present" (both of which should have been amber rather than red) has meant that both sites have incorrectly removed from the second phase of assessment. This has incorrectly excluded these lands from a full and fair assessment. It is considered that the County Development Plan has erred in this regard and the full assessment of the sites was flawed. Both sites are capable of being fully serviced in the lifetime of the plan and should be classified as Tier 2 sites.

The Sligo County Council Chief Executive's Report of the 22nd March 2024 included only limited commentary on the submission in general and as it related to the Infrastructural Assessment. The commentary on the latter was:

"The infrastructural assessment undertaken for Sligo Town outlines that the subject lands are neither fully serviced (Tier 1), nor serviceable during the six-year period of the CDP 2024-2030 (Tier 2). The public sewer and cycle lane does not extend to the subject lands. An extension of the public sewer of approximately 1000m is required to service the lands and there is no present commitment by Uisce Eireann to provide the required wastewater infrastructure. In accordance with the National Policy Objective 72c (NPF), land that cannot be serviced within the life of the

plan should not be zoned for development”.

It is unclear on this basis why the Chief Executive did not recommend re- categorizing from ‘red’ to ‘amber’ for the two categories of “Access to foul sewer” and “Cycle lane present” given the definition in the Development Plan of the ‘amber’ category as:

“An amber circle indicates that services are not yet available or further investment in infrastructure is required, and this investment is likely to be provided during the lifetime of the Plan”.

The result of the incorrect classification of sites 44 and 45 in terms of “Access to foul sewer” and “Cycle lane present” (both of which should have been amber rather than red) has meant that the lands have not been identified as Tier 2 (serviceable).

We also wish to refer to the following that has occurred post the above referenced submission:

- *A Confirmation of Feasibility relating to the development at Hazelwood has been received from Uisce Eireann. Refer to Appendix 2. It is noted that the OPR Recommendation of the 27th October stated the following in relation to PAZ 14 and PAZ 15:*

“UÉ’s submission (MA stage) states that new connections would require network extensions and upgrades, pumping station and rising main infrastructures and that such works would have to be undertaken by developers. The Infrastructure Assessment (Appendix 1 of draft Plan) identified these lands as ‘not fully serviced’ and these lands were not included in the SCA”.

With a confirmation of Feasibility now issued, and notwithstanding that upgrades are required as noted in the Confirmation of Feasibility, it is clear that the lands are considered to be serviceable in this respect.

A Site Specific Flood Risk Assessment for the proposed development at Hazelwood has been carried out (see Appendix 3) which concludes that: “that the proposed development site is at low risk of flooding as defined by the guidance document ‘The Planning System and Flood Risk Management’, and the proposed works will not result in any significant change in risk or flooding regime”. The area of the site subject to low risk of flooding is part of PAZ-15, to the south of the R286 and is only approximately 1 hectare of the 15 hectares at PAZ-15. The majority of this 1 ha is mature woodland, which would be retained as such in any development proposal. No other areas are identified as being at risk of flooding.

▪ Steps 2 to 4

When the lands are correctly identified as Tier 2 (serviceable), Step 2 requires a decision on the most appropriate lands to be zoned. Steps 3 and 4 acknowledge the scenario that spatially less central lands can be zoned for development.

We have reviewed the subject lands under the Settlement Capacity Audit using the scoring system employed by Sligo County Council and an assessment has been carried out (see Appendix 4). Whilst it is not accepted that this scoring system is the correct approach to the SCA, even where it has been applied to the site at Hazelwood, it has been employed incorrectly.

As noted above, it is considered that the site is easily serviced during the lifetime of the Plan and this review should have been carried out by Sligo County Council.

As noted in the SCA at Appendix 3, the site scores 86.

If included in the Infrastructure Assessment Table on Pg 10 of the Infrastructural Assessment, this would place the lands as the 15th most preferable site in Sligo Town.

A community facilities zoning is now applied to a part of the site at PAZ 16, immediately west of PAZ 14 and PAZ 15. This Community Facilities zoning will facilitate the delivery of community facilities in conjunction with residential development in the locality, however it is unlikely that any such community facilities would be developed in the absence of sufficient zoning for residential lands in the immediate locality, to allow a critical mass required to justify the community facilities to be delivered. We refer to the attached letter of support from the GAA at Appendix 5 which states that the appropriate zoning of lands in Hazelwood is essential for the delivery of Cairí / St. Joseph's GAA.

We also enclose at Appendix 6 a letter of support from Sligo Chamber of Commerce for residential zoning at Hazelwood.

We also wish to note that there is repeated reference in various reports (e.g. Chief Executive Reports) and OPR submissions at various stages of the process to 'unsustainable development' without any detailed explanation as to why the site is considered to be unsustainable or what metrics or criteria are being used to measure this. We refer to a Sustainability Assessment attached at Appendix 7 carried out by Accelerating Action (<https://www.acceleratingaction.com/>) which clearly demonstrates that the proposed development on the site would be sustainable development and aligned to the NPF, RSES, local authority climate action plans. This report has been specifically commissioned to examine the sustainability of the site and we are not aware that any other development site in the County has been subject to such a rigorous assessment of their sustainability criteria.

– **Subsection 4.16** attempts to summarise the compliance with national and regional planning objectives, in the following manner:

- *NPO 3c – the zoning at Hazelwood would not be contrary to the objective to deliver at least 30% of all new homes in settlements other than the five Cities and their suburbs, within their existing built-up footprints. The zoning of the site at Hazelwood, whilst outside the CSO settlement boundary of Sligo town, has been shown to be sequentially suitable.*
- *NPO 18a – the zoning at Hazelwood would not be contrary to the objective to support the proportionate growth of and appropriately designed development in rural towns that will contribute to their regeneration and renewal, including interventions in the public realm, the provision of amenities, the acquisition of sites and the provision of services. The zoning would allow for the delivery of new homes with supporting social infrastructure in a sustainable location in the form of an urban extension to the east of Sligo town.*
- *NPO 60 – there are no known impediments to the zoning of the site in terms of conserving and enhancing the rich qualities of natural and cultural heritage of Ireland in a manner appropriate to their significance.*
- *NPO 72c – it has been demonstrated that the Hazelwood lands are 'servicable and as such are not lands which "cannot be serviced within the life of the relevant plan, such lands should not be zoned for development".*
- *RPO 3.2(b) – The site in Hazelwood is located in the Ballinode area, described in the RSES as: "Located on the northern shores of Garavogue River, the Ballinode area is relatively close to the town centre, to the Institute of Technology and the University Hospital Sligo. These large employers generate significant demand for residential accommodation and local commercial services. A local area plan adopted in 2004 aimed to create a high-quality urban extension, including two new neighbourhood centres. It was estimated that the LAP area could accommodate between 4,000 and 7,200 new residents ...*

Whilst development of the scale previously envisaged would not be viable, it is considered that some lands could be released from the Strategic Land Reserve to accommodate planned expansion to the north east of the town centre"

The RSES at Page 105 goes on to state that:

"Within a short walking distance of the urban core, there is an opportunity to create sustainable communities in Caltragh and Ballinode, on greenfield lands with a total capacity of over 7,000 new homes (on a phased basis). These areas are expected to develop following the construction of key roads (see below) that would link them into the existing urban fabric".

- *RPO 3.7.39 is to ensure that at least 40% of new residential and employment-related development in the Regional Growth Centre occurs within Sligo's existing built-up urban area, through regeneration and consolidation on infill and brownfield sites. Very much like the CSO settlement boundaries, this target of 40% of new development within the existing built up area does not act to preclude zoning or development outside of the built up area.*
- *RPO 5.14 is to "support the conservation of the region's National Monuments and built heritage, being structures that are of special architectural, historic, archaeological, artistic, cultural, scientific, social or technical interest that are of Regional Significance or above". There are no known impediments to the zoning of the site in terms of conserving and enhancing the rich qualities of natural and cultural heritage of Ireland in a manner appropriate to their significance.*

Submission 80

<https://consult.sligococo.ie/en/submission/slg-c57-80>

Author: [Valerie Robinson](#)

The submission expresses support for the zoning of the lands subject of PAZ-57 as New Residential (nRES) for the following reasons:

- There is a current planning application submitted for this site.
- There is an urgent need for housing to be provided in Strandhill.
- The site is situated in the village core and is *“sequentially preferable over all the currently zoned residential lands in Strandhill”*.
- The site is a serviced site and identified as a Tier 1 site in the CDP Infrastructural Assessment.

The submission notes that the site was previously zoned residential, from 2003 to 2013. The lands were placed in SLR *“as a short-term measure”* due to the 2008 economic downturn.

Submission 81

<https://consult.sligococo.ie/en/submission/slg-c57-81>

Author: [Carol Gallagher](#)

The submission expresses support for the zoning of the lands subject of PAZ-57 as New Residential (nRES) for the following reasons:

- There is a current planning application submitted for this site.
- There is an urgent need for housing to be provided in Strandhill.
- The site is situated in the village core and is *“sequentially preferable over all the currently zoned residential lands in Strandhill”*.
- The site is a serviced site and identified as a Tier 1 site in the CDP Infrastructural Assessment.

The submission notes that the site was previously zoned residential, from 2003 to 2013. The lands were placed in SLR *“as a short-term measure”* due to the 2008 economic downturn.

Submission 82

<https://consult.sligococo.ie/en/submission/slg-c57-82>

Author: Beldare Homes

This submission, prepared by consultant Robert Keran on behalf of Beldare Homes (and subsidiary companies including Altitude Distribution Ltd.), is one of six with similar contents.

Submission 82 consists of six parts (preceded by an Executive Summary) and an Appendix, as follows:

1. Introduction
 2. Basis for and structure of submission
 3. Relevant national and regional planning policy
 4. Systemic procedural errors in the making of the Sligo CDP 2024-2030
 5. Material errors in the Core Strategy of the Sligo CDP 2024-2030
 6. Incorrect application of the Settlement Capacity Audit
- Appendix – Copy of Draft direction

The **summary of the views** expressed in this submission (as required by Section 31(9) of the Planning and Development Act 2000, as amended) includes the full text of Robert Keran's Executive Summary, as well as further details of the "*salient*" points made by the author, as requested under Subsection 4.10 of the submission.

The **Executive Summary** states the following:

"Systemic Procedural Errors in the Making of the Sligo County Development Plan 2024 – 2030:

- *The reporting of the Chief Executive in reports on submissions received on the various stages of the plan making process fell substantially short of the statutory requirements under Section 12(4)(b)(ii)(III), Section 12(4)(b)(iii) and Section 12(8) of the Planning and Development Act 2000, as amended requirements, resulting in a lack of detail being presented to elected members to allow them to be properly informed of the issues raised in the submissions. This also gives rise to significant concern that the Council executives did not have proper regard to the content of submissions made during the course of the preparation of the County Development Plan.*
- *It is considered that the local planning authority failed to deliver the County Development Plan within the statutory timeframes set out in the Act. The detail of this is set out in this submission. The above gives rise to significant concern in relation to the processes and procedures within the local planning authority in terms of their statutory compliance with the plan making process as set out under the Act.*
- *The plan making period for the County Development Plan spanned some three years and two months (38 months) as opposed to the normal two years (24 months). This expanded period, whether or not permissible under the legislation, places an extra onus on the local authority to ensure the use of up- to-date information and data during the process, and at all stages of the process, to ensure that the adopted County Development Plan is fit for purpose for the 6 year period to which it relates. It will be shown below in Section 5.0 that the Core Strategy of the County Development Plan has not used up to date data.*

Material Errors in the Core Strategy of the Sligo County Development Plan 2024-2030:

- There are significant and material errors and are these not subjective or open to interpretation.
- A sample of the errors are:
 - At Row B of Table 5.2, error in estimated housing completion figure for 2023 and the first half of 2024, resulting in a shortfall of 170 units in future housing allocation.
 - At Row C of Table 5.2, Sligo County Council used outdated data (January 2023) for Homeless figures. This results in a 33 unit under estimation of housing demand going forward.
 - At Row E1 of Table 5.2, there is a mathematical error when taking figures from the HNDA toolkit. When done correctly, the figure is 4,474 units. Instead, the published E1 value is 4056, which results in an inexplicable 418 unit deficit.
 - At Row E2 of Table 5.2, the Council's value of 1,315 was not derived from the HNDA toolkit, and results in a further 123-unit deficit in housing allocation.
- When the corrections are all made, the housing allocation figure for the County should be **4,564 units**. The Core Strategy and Settlement Strategy have therefore been significantly miscalculated the total household total as 4029, when it should be 4564.
- This therefore significantly and materially impacted on both the recommendations of the OPR and indeed the Chief Executive that sufficient land was zoned to meet the Housing Strategy target.
- Table 3.2 was not updated at Column 6 (the additional provision column) for the public consultation on the proposed material alterations from the Draft Plan figures to reflect the increased housing allocation figures at Column 3 of Table 3.2. Therefore, there was no public consultation whatsoever on updated 'additional provision' figures at Column 6.

Incorrect Application of the Settlement Capacity Audit:

- In the final Infrastructural Assessment included in the County Development Plan, not a single site has been identified as Tier 2 (i.e. serviceable). The intent of the Guidelines is not that only fully serviced or fully not serviced sites are identified. The intent is that 'serviceable', i.e. Tier 2, sites are also identified and are then subject to the Settlement Capacity Audit. The process undertaken by Sligo County Council is therefore considered fundamentally flawed.
- The Council in purporting to carry out a Settlement Capacity Audit (SCA) have entirely misconstrued the Development Plan Guidelines. Instead of setting out information on serviced sites and serviceable sites in the form outlined in the Guidelines, the Council has instead set out an arbitrary scoring system and ranking of sites which does not reflect the aim and purpose of the SCA as set out in the Guidelines. No rationale and/or reasons are given to explain the scoring system used by the Council in the SCA.
- Fundamentally, the scoring assessment skews the consideration of what is the most suitable site(s) to be zoned by basing the decision on a fabricated scoring system which absolves the Council of clear and logical decision making in relation to the zoning of land.
- The SCA carried out by Sligo County Council further provides that a different criterion for settlements outside Sligo Town, where a more limited sequential approach is taken. In reducing the assessment of each site to a limited and narrow set of criteria, the Council failed to take a site-specific assessment of each site, by excluding site specific aspect relevant to proper planning and sustainable development.
- As regards the planning history criteria used by Sligo County Council in the SCA, the failure to develop land which has been zoned as residential is not accounted for in the SCA. In fact, planning permissions granted previously which were not acted on and allowed to expire are rewarded. The exceptions to the

sequential approach as set out in the Development Plan Guidelines clearly envisage circumstances relating to hoarding of zoned land which may result in the land not being zoned on an ongoing basis. The adopted CDP makes no reference whatsoever to these exceptions.

Section 1 indicates that the submission is made on behalf of Beldare Homes and its subsidiary companies, including Altitude Distribution Ltd. Beldare Homes is described as a *“large scale residential developer based in the north-west of Ireland and operating at a nationwide reach”*.

The consultant further indicates that Altitude Distribution Ltd. has been granted leave for judicial review of *“certain elements of the Sligo County Development Plan 2024–2030”*.

Section 2 specifies that five other submissions have been made by Beldare Homes in relation to the landholdings subject to PAZ-14 and PAZ-15 (Hazelwood, Sligo Town), PAZ-57 (Golf Course Road, Strandhill), PAZ-12 (Cairns Road, Sligo Town), PAZ-44 and PAZ-45 (Ballysadare).

The consultant specifies that his client recognises that errors in the calculation of housing supply targets are *“not a matter directly raised in the Draft Ministerial Direction”*, but *“it is critically relevant to any informed decision as to whether to retain or remove land use zoning for residential purposes on various parcels of land”*.

Section 3 of the submission lists and quotes from relevant national and regional planning policy documents, as they are referred to in the Draft Direction:

- Section 10(2)(n) of the Planning and Development Act 2000 (as amended);
- NPO 3(c) NPO 18(a), NPO 60, NPO 72(a)-(c) of the National Planning Framework;
- RPO 3.2(b), RPO 3.7.39, RPO 5.14 of the Regional Spatial and Economic Strategy;
- Section 6.2.3 of the Development Plan Guidelines for Planning Authorities (2022).

Section 4 of the submission lists the “systemic procedural errors in the making of the Sligo County Development Plan 2024-2030”, such as:

- *“absence of appropriate summary of submissions”* in the Chief Executive’s Reports;
- *“material breach of statutory periods for the making of a development Plan”*.
- **Subsection 4.5** expresses concerns regarding the *“lack of detail being presented to elected members to allow them to be properly informed of the issues raised in the submissions”*. It is stated that there was significant repetition in wording used in the Chief Executive Reports across many submissions.
- **Subsection 4.7** indicates that a significant number of points made in the previous Beldare Homes submissions, conflicting with a statement on page 176 of the Third CE Report (in relation to the Infrastructure Assessment), have not been summarised.
- **Subsection 4.10** *“respectfully requests that this submission is carefully summarised by the Chief Executive in the reporting to the elected members to ensure that all salient points are included in the summary”*.
- **Subsections 4.11 and 4.13** contend that *“the local planning authority failed to deliver the County Development Plan within the statutory timeframes set out in the Act”* because it commenced the

review of the 2017–2023 County Development Plan on the 30th July 2021. The process/procedure followed in order to extend the life of the Development Plan to 2024 raises “*significant concern*” in terms of statutory compliance with the plan making process as set out under the Act.

- **Subsection 4.15** notes “*other more minor non-compliance with statutory periods set out in the Act*”, e.g. *the publication of the Third CE Report “after the statutory period set out in the Act”*”.

Section 5 of the submission lists “*material errors in the Core Strategy of the Sligo County Development Plan 2024-2030*”, indicating that the proposed amendment PA-11 relating to Tab 5.2 (Adjusted total housing demand in Co. Sligo during the Development Plan period) “*came about based on the supplementary clarifications provided by the DHLGH in a submission on the Draft Plan*”. The subsections state the following:

- Table 5.2 had errors that had not been addressed.
- The Executive advised the Members that the options available were to accept or reject the amendment. “*The option of seeking to address these errors by way of another round of public consultation does not appear to have been considered*”;
- The errors were not subjective or open to interpretation, and the final Adjusted Total Plan Demand fed into Column 3 of Table 3.2 (Core Strategy Table), which shows the amount of land zoned in each settlement. This resulted in a mistake in the quantum of housing units required to meet demand.
- The OPR recommendation of 27 October 2024 does not acknowledge errors in the tables. If errors were to be corrected, this “*would allow for the additional quantum of residential land introduced at material alteration stage*”.

- **Subsection 5.7** details the errors mentioned above, as follows:

A. Row ‘B’ Value Error

- *Row B of Table 5.2 is:*

Plan period: Q3 2024 to Q3 2030 (1 July 2024 to 30 June 2030)		Annual average households	Total households
B	Actual new housing supply 2017 to Q4 2022 and estimated future delivery in 2023 and Q1-Q2 2024		1,345 (from CSO completions data and estimation of 2024 delivery)

- ‘CSO Completions date and estimation of 2024 delivery’ is the quoted source.
- The ‘B’ value used in Table 5.2 represents the actual housing completions in Sligo from 2017-2022 added to an estimated completion figure for 2023 and the first half of 2024.
- The housing completions for 2017 to 2022 = 940 (938) units. When averaged over 6 years this is a rate of 157 (156.3) units per annum. Using this rate, the 2023-2024 H1 estimate should be 235 units.
- $940 (938) + 235 = 1,175 (1,173)$ units. This results in a shortfall of 170 units in future housing allocation, or in other words, Sligo County Council has **overestimated actual housing delivery by 170 units**.
- The 1,345 figure is therefore an error. Source: <https://data.cso.ie/table/NDA05>

B. Row 'C' Value Error:

- Row C of Table 5.2 is as follows:

Plan period: Q3 2024 to Q3 2030 (1 July 2024 to 30 June 2030)		Annual average households	Total households
C	Homeless households (latest data from January 2023 Homeless Report), and unmet demand as at Census 2016		59 (from DHLGH and Census) (was 43 originally)

- Sligo County Council used outdated data (January 2023) in calculating the 'C' value in Table 5.2 above.
- Homeless Reports are published monthly. See link below. gov.ie - [Homelessness data](#)
- If we take the report published the month before the Draft CDP went on public display, so the January 2024 report (here: [Template 2 Cover Front and Back Dept](#)) the homeless figure for Sligo is 83 (Page 8) compared to the figure of 59 used in the proposed material alterations to the CDP.
- When added to Sligo's estimated 'existing need' of 9 from the Housing Need and Demand Assessment (**HNDA**) Toolkit (see source and second screenshot below at para. 38), the value should be 92.

C. Resultant Row 'D' Value Error:

- The first two errors set out at Points 1 and 2 above result in a 203-unit shortfall in Housing Demand ('D' Value), i.e. the 170 shortfall under Row B and the 33 shortfall under Row D.

D. Row 'E1' Value Error:

- Row E1 of Table 5.2 is as follows:

Plan period: Q3 2024 to Q3 2030 (1 July 2024 to 30 June 2030)		Annual average households	Total households
E1	ESRI Baseline scenario projected new household demand 2017 to Q4 2026		4,056 (from ESRI research)

- The correct calculation is to simply add the values highlighted green in the screenshot below from the HNDA Toolkit for Local Authorities.
- Adding these figures gives a total of 4,474 units, and this should be the E1 value in Table 5.2. Instead, the published E1 value is 4056, which results in an inexplicable 418 unit deficit.

New Households Projection - Baseline	
	Sligo CoCo
2017	378
2018	443
2019	468
2020	467
2021	463
2022	450
2023	461
2024	454
2025	449
2026	441

Source: HNDA Toolkit for Local Authorities (<https://www.gov.ie/en/publication/eea99-housing-need-and-demand-assessment-hnda/>)

E. Row 'E2' Value Error:

- Row E2 of Table 5.2 is as follows:

Plan period: Q3 2024 to Q3 2030 (1 July 2024 to 30 June 2030)		Annual average households	Total households
E2	ESRI NPF scenario projected new household demand 2027 to Q2 2030 (Plan end)		1,315 (from ESRI research)

- According to the HNDA Toolkit, the National Planning Framework (NPF) scenario projected new household demand 2027 to Q2 2030 is 1,438 (which assumes 50% of the 2030 figure to account for a ½ year).
- The screenshot below from the HNDA Toolkit shows the correct calculation, with the figures to be used highlighted in orange. The Council's value of 1,315 was not derived from these numbers, and results in a further 123-unit deficit.

New Households Projections - 50/50	
	Sligo CoCo
2017	331
2018	391
2019	414
2020	413
2021	409
2022	396
2023	407
2024	400
2025	396
2026	387
2027	401
2028	416
2029	413
2030	416

Source: HNDA Toolkit for Local Authorities (<https://www.gov.ie/en/publication/eea99-housing-need-and-demand-assessment-hnda/>)

F. Row 'E3' Value Error:

- Row E3 of Table 5.2 is as follows:

Plan period: Q3 2024 to Q3 2030 (1 July 2024 to 30 June 2030)		Annual average households	Total households
E3	Mid-point between A-E2 (ESRI NPF and Baseline scenarios to Q4 2026)		4,000

- Both the 'E1' and 'E2' values are used to calculate the 'E3' value, which is the mid-point between the ESRI NPF and baseline scenarios to Q4 2026. Due to the errors in formulating the E1 and E2 values, an incorrect 'E3' value of 4000 used.
- If the revised 'E1' and 'E2' values (in green) are used in the formula, the 'E3' value will equal to 4,209 units.

G. Adjusted Total Plan Demand Row 'E4' Value Error:

- The Table 5.2 Row E4 value is:

Plan period: Q3 2024 to Q3 2030 (1 July 2024 to 30 June 2030)		Annual average households	Total households
E4	Adjusted Total Plan Demand calculation based on E2 + E3 in lieu of A above	671	4,029 (E2 + E3 - B + C = total)

- Both the 'E2' and 'E3' values are used in the final calculation to yield the Adjusted Total Plan Demand 'E4' of 4,029, which is used in Sligo's Core Strategy Table as their final housing supply target.
- When the corrections outlined above are all made, the 'E4' value equals **4,564 units**.

– **Subsection 5.9** lists the errors in Table 3.2 (Core Strategy Table) as follows:

- Adjusted Total Plan Demand in Column 4 is a figure taken from Table 5.2 and allocates it to each Settlement area. Table 5.2 has been shown above to underestimate demand by 535, and therefore the Column 4 totals for the County should be 4,564. In turn, and on the basis that all additional growth be allocated to Sligo Town, the figure for Sligo Town should change from 2,512 to 3,047.
- The original figures for targeted increase in Sligo Town's population as set out in columns 2 and 3 was 3,192 (i.e. 23,800 minus 20,608), as published in the Draft County Development Plan. This was increased on the recommendation of the OPR and the NWRA by 1,560 to 4,752 (i.e. 25,360 minus 20,608), a significant increase of 49%. However, there was not a single extra acre of land zoned to accommodate this new population This error likely arose from a misunderstanding by Sligo County Council of the OPR Recommendation to zone no new lands for a 'minor' adjustment. This was clearly not a minor adjustment. It is essential to note that the 137 extra units that arose from correcting the Adjusted Total Plan Demand in Table 5.2 from 3,892 to 4,029 on the OPR's recommendation is a separate adjustment to the change in the population target as is clear from pages 5-6 of the OPR's December 2023 submission.

- *The total in Column 3 has an error of addition. The total should be 76,710, not 75,360.*
 - *The County Development Plan did not commence until the 11th of November 2024. It was initially intended to commence on 1st July 2024, and all Core Strategy figures are on this basis. Therefore, the most up to date data has not been used in that another quarter of a year undersupply should be included (i.e. for July to September). The projected supply as used in the Core Strategy was 168 but the actual supply was only 40 (CSO Q3 figures 2024). This results in an additional undersupply of 128 units.*
 - *It is essential that these errors are correct in Table 5.2, and feed into the housing allocation figures in Table 3.2.*
- **Subsection 5.10** states that Table 3.2 *“was not updated at Column 6 (the additional provision column) from the Draft Plan figures to reflect the increased housing allocation figures at Column 3 of Table 3.2. Therefore, there was no public consultation whatsoever on updated ‘additional provision’ figures at Column 6.”*
 - **Subsection 5.11** states that *“the additional provision figures in Table 3.2 in the adopted County Development Plan have not been adjusted for a number of sites which were changed / should have been changed from nRES in the Draft County Development Plan to ‘existing residential’ in the material amendments”*. A total of 209 units *“had not been subtracted from the total zoning figures, obviously completely distorting the additional provision”*.

Section 6 of the submission refers to the *“incorrect application of the settlement capacity audit”*.

It commences by presenting extracts from the Development Plan Guidelines, including the 4-step Sequential Test for Residential Zoning in Settlements.

It continues by quoting from Appendix A of the CDP, where Section A.1.1 states that *“the initial IA, carried out in Q2 2023, a total of 205 sites were identified as Tier 1, and only 3 sites were classified as Tier 2. A supplementary IA, carried out in Q3 2024, of sites subject to Proposed Amendments to Zoning (PAZ), identified a further 21 Tier 1 sites”*.

- **Subsection 6.7** states that *“in the final Infrastructural Assessment included in the County Development Plan, not a single site has been identified as Tier 2 (i.e. serviceable). This suggests that Sligo County Council has not fully understood the intent behind the exercise”*.
- **Subsections 6.8 and 6.9** contend that the approach used by Sligo County Council is *“fundamentally flawed in that no Tier 2 sites were identified and as such no Tier 2 sites (which have the potential to be sequentially preferable to some Tier 1 sites, as set out in the ‘exceptions’ further described below) were brought forward for assessment in the Settlement Capacity Audit”*. This conflicts with NPO 72, which requires planning authorities to apply a tiered approach to zoning.
- **Subsections 6.10 and 6.11** quote extracts from the Development Plan Guidelines, in relation to settlement capacity audits.
- **Sections 6.12 and 6.13** contend that Sligo County Council has *“entirely misconstrued”* the Development Plan Guidelines by setting out a scoring system and ranking sites.
- **Subsection 6.18** states that *“no rationale and/or reasons are given to explain the scoring system used by the Council in the SCA”*.
- **Subsection 6.19** contends that *“the scoring assessment skews the consideration of what is the most suitable site(s) to be zoned”*.

- **Subsections 22 to 24** state that the “*more limited sequential approach*” taken for settlements outside of Sligo Town, which is said to exclude the social infrastructure criterion, has no basis, while the planning and environmental status is arbitrary and wholly inadequate.
- **Subsection 6.28** states that “*as regards the planning history criteria, the failure to develop land which has been zoned as residential is in fact not accounted for in the table*” and that “*planning permissions granted which were not acted on and allowed to expire are rewarded*”.
- **Subsection 6.29** indicates that “*the actual rate of delivery on zoned residential land in Sligo Town over the life of the 2017 to 2023 CDP is approximately 18%. Furthermore, an analysis of housing completions in Strandhill between 2017 and 2022 indicates that only 44 residential units were actually completed in Strandhill in the lifetime of the CDP.*”
- **Subsection 6.30** expresses “*significant concern that the OPR Recommendation of the 27th October 2024 may have been based on the information contained in the Infrastructural Assessment and SCA in the County Development Plan which are, it is submitted, at their core inconsistent with the Guidelines and inaccurate in a number of respects.*”

Submission 83

<https://consult.sligococo.ie/en/submission/slg-c57-83>

Author: [Henrietta Veale](#)

This submission objects to PAZ-56 for the reasons summarised below:

- This land is at the periphery of Strandhill, outside the settlement boundary, in a cul-de-sac.
- The land is not serviced by a sewer and lies lower than the adjoining access road.
- There is a blind corner and no footpaths at this location, resulting in a safety concern.
- The zoning of this land *"is not consistent with objectives of the zoning strategy where land in villages and towns should be centrally zoned ahead of zoning at the peripheries"*.

Submission 84

<https://consult.sligococo.ie/en/submission/slg-c57-84>

Author: [Chris Gonley](#)

Without specifically mentioning PAZ-14 or PAZ-15, the submission supports the zoning of lands at Hazelwood.

The author states that there is a real need for housing and community facilities in the area, which has a number of large employers, and there is also a need for student accommodation.

New families in the Calry area would be *“good for schools”*. The community requires new facilities such as sports fields, halls etc. The local GAA would *“expand youth development to the area”* if facilities become available.

Submission 85

<https://consult.sligococo.ie/en/submission/slg-c57-85>

Author: [Mark Kelly](#)

The submission supports the rezoning of lands in Strandhill (PAZ-57) and Hazelwood (PAZ-14 and PAZ-15). The author states that he lives with his parents “*despite being over 30 years of age*”, because of the housing shortage in Sligo, where demand outweighs supply.

The author urges the Minister “*to consider the zoning of PAZ 57, 14 & 15 as well as all of the other proposed residential zoning locations as vital to the growth of Sligo and the Northwest*”.

Submission 86

<https://consult.sligococo.ie/en/submission/slq-c57-86>

Author: [David McMunn](#)

The author of the submission *“believes”* that the land (subject to PAZ-57) should be rezoned, as he has *“a lot of relatives and friends hoping to relocate to Sligo, especially Strandhill which is impossible to get a new home”*.

Submission 87

<https://consult.sligococo.ie/en/submission/slg-c57-87>

Author: [Barry Whiite](#)

The submission supports the proposed zoning of lands under PAZ-14 and PAZ-15, which are located *"between the ATU and St Angelas, serviced by a bus route, near key employers such as ATU, Abbvie and Sligo University Hospital"* and are *"serviced by new recreational trails which run along the boundary of the site"*.

Previous planning permission on the lands is *"aligned to the RSES which sets out that this part of Sligo be a growth area"*.

The author states that *"there are over 5000 children in homeless accommodation which nobody seems to care about"* and that *"Sligo is the second worst county in Ireland for housing delivery and only delivered approximately 18% of the zoned land of the last development plan"*.

Submission 88

<https://consult.sligococo.ie/en/submission/slg-c57-88>

Author: [Stephen Taheny](#)

This submission states that more land is needed for housing, as *“more housing will encourage young people to come home to Sligo”*. PAZ-57 is noted as being the specific location.

Submission 89

<https://consult.sligococo.ie/en/submission/slg-c57-89>

Author: [Erin Regan](#)

The submission supports the rezoning of lands in Strandhill (PAZ-57) and Hazelwood (PAZ-14 and PAZ-15). The author states that she lives with her family “*despite being in my mid-twenties*”, because of the housing shortage in Sligo, where demand outweighs supply.

The author urges the Minister “*to consider the zoning of PAZ 57, 14 & 15 as well as all of the other proposed residential zoning locations as vital to the growth of Sligo and the Northwest*”.

Submission 90

<https://consult.sligococo.ie/en/submission/slg-c57-90>

Author: [John Monahan](#)

The submission, which relates to PAZ-56, is summarised as follows:

- The site is unserviced and should not be zoned if there is no plan to service it within the life of the Development Plan.
- Medium density housing would be inappropriate at this location.
- The access road has a “*dangerous blind corner that would be exacerbated by new development*”.

A map included in the submission illustrates a “*more appropriate*” (reduced) extent of the zoning, reflecting the development limit (red line) line in a previous development plan.

The author states that he is writing “*as a local Architect and resident of Strandhill*”.

Submission 91

<https://consult.sligococo.ie/en/submission/slg-c57-91>

Author: [Martina Keenan Rivero](#) (McCutcheon Halley Planning Consultants) on behalf of Margaret and Walter Burke

The submission supports the New Residential (nRES) zoning of the lands subject to PAZ-13 in Sligo Town instead of Strategic Land Reserve (SLR), as stated in **Section 1** (Introduction).

Section 2 (Site Context) of the submission describes (with illustrations) the surroundings of the lands, mentioning facilities, services and employers in the Caltragh/Cornageeha area, such as Summerhill College, housing estates, Department of Social Protection offices, road infrastructure, bus routes and water services. The Western Distributor Road is highlighted as having a *“major strategic importance to the region”* and providing *“improved access to the residential lands in the Caltragh area where our Client’s sites are located”*.

Section 3 (Policy Context) provides a brief review of relevant national regional and local planning policy, indicating that:

- The Draft Revised NPF continues to acknowledge the role and significance of Sligo *“as a centre of employment and services at a scale much greater than its scale in terms of population and supports building critical mass of population and further employment in the settlement”*.
- The NWRA RSES identifies Caltragh *“as an area comprising large amounts of undeveloped lands adjoining established residential areas, with the capacity to accommodate an additional population of over 11,000 people”*; relevant RPOs are 3.7.41 and 3.7.42, relating to the WDR.
- In the Sligo CDP 2024, the strategy for Sligo Town prioritises *“new residential and employment-related development on greenfield sites in the areas served by the Western Distributor Road at Caltragh and Oakfield”*.

The consultant notes the *“zoning history”* of the lands, which had been designated as R3 (medium-high density residential) and MIX 1 (mixed uses, non-retail) in the former Sligo and Environs Development Plan 2010 and as Strategic Land Reserve in the subsequent Sligo CDP 2017.

Section 4 of the submission presents a **“Rationale for Proposed Zoning”**, arguing that *“the lands are highly accessible, benefitting from their proximity to a wide array of social infrastructure necessary to support new residential communities. It also benefits from the presence of necessary enabling infrastructure that includes the newly complete WDR, as well as access to water and wastewater services. Zoning of the site is consistent with the principle of compact growth, as it is within the Development Limit of Sligo Town and would provide for consolidation of the built-up area. The land is contiguous to existing and permitted development¹ in Caltragh east of the N4”*.

The **Conclusion** summarises as follows:

“For the reasons set out in this submission, we consider that the proposed rezoning of our client’s site should be supported. The inclusion of our client’s site within the available supply of residential zoned lands would future-proof the development plan by:

- *Ensuring that its land use zoning policies are sufficiently flexible to ensure that there is no shortage of residential lands during the lifetime of the Development Plan.*
- *Responding to the current crisis on the availability of affordable housing options in the County, by supporting the development of sustainable and affordable housing.*
- *Prioritising the zoning of lands that are likely to be delivered over the lifetime of the Development Plan.”*

Submission 92

<https://consult.sligococo.ie/en/submission/slg-c57-92>

Author: [Kelly Energy and Engineering Services](#)

The submission supports the rezoning of lands in Strandhill (PAZ-57) and Hazelwood (PAZ-14 and PAZ-15) and suggests that *“all lands which have previously been proposed for zoning are vital to the growth of Sligo and the wellbeing of its inhabitants”*.

The author urges the Minister *“to consider the zoning of PAZ 57, 14 & 15 as well as all of the other proposed residential zoning locations as vital to the growth of Sligo and the Northwest”*.

Submission 93

<https://consult.sligococo.ie/en/submission/slg-c57-93>

Author: [Barry White](#)

This submission supports PAZ-57 for the following reasons:

- The land the subject of PAZ-57 *"has already had a planning application submitted indicating clear intent to bring the project forward for development in the lifetime of the next CD"*.
- The only reason for refusing a previous application on the site related to the wastewater treatment plant, which has now been upgraded.
- The scheme includes community facilities such as a playground and a crèche and provides a pedestrian link from the Top Road to the Golf Course Road.
- The site is a Tier 1 serviced site.
- Strandhill is *"a key satellite village as part of the RSES and the CDP so it is vital sustainable developments come forward in the short term"*.

Submission 94

<https://consult.sligococo.ie/en/submission/slg-c57-94>

Author: [Ronan Gray](#)

The submission supports the rezoning of lands in Strandhill (PAZ-57) and Hazelwood (PAZ-14 and PAZ-15). The author states that he lives with his parents “*despite being over 30 years of age*”, because of the housing shortage in Sligo, where demand outweighs supply.

The author urges the Minister “*to consider the zoning of PAZ 57, 14 & 15 as well as all of the other proposed residential zoning locations as vital to the growth of Sligo and the Northwest*”.

Submission 95

<https://consult.sligococo.ie/en/submission/slg-c57-95>

Author: [Anne McConnon](#)

The submission supports the rezoning of lands in Strandhill (PAZ-57) and Hazelwood (PAZ-14 and PAZ-15). The author states that she still lives with at home with her parents, because of the housing shortage in Sligo, where demand outweighs supply.

The author urges the Minister *"to consider the zoning of PAZ 57, 14 & 15 as well as all of the other proposed residential zoning locations as vital to the growth of Sligo and the Northwest"*.

Submission 96

<https://consult.sligococo.ie/en/submission/slg-c57-96>

Author: [Eugene Flynn](#)

The submission expresses “*great disappointment*” regarding the inclusion of amendments PAZ-11 and PAZ-12 into the Development Plan, against the advice of Council’s Executive and that of the OPR, ignoring “*previous planning and zoning decisions in relation to these areas*”.

It is indicated that the lands subject to PAZ-11 and PAZ-12 form part of the neolithic landscape included in Ireland’s World Heritage Site tentative list, **The Passage Tomb Landscape of County Sligo**, along two others (Transatlantic Cable Ensemble: Valentia and Royal Sites of Ireland). It is expected that only one of these will be chosen to go forward, as Ireland’s submission as UNESCO Heritage Site.

The submission states that “*zoning both of these locations for development at this time sends out all the wrong signals from Sligo County Councillors about their commitment to achieving World Heritage status and the benefits it will bring to the county*”.

The author considers Cairns Hill as “*unique in its location close to an urban centre, presenting an opportunity to include it as part of the proposed Green Belt and an amenity to be used by locals and tourists alike*”.

Sligo’s tourism potential would be substantially increased, in line with sites like Carrowmore, Giant’s Causeway, Sliabh Liag, as “*a multi-location destination (Carrowkeel, Knocknarae, Strandhill, Cairns Hill, Carrowmore) presents opportunities for multi-night stays*”.

Fáilte Ireland recognised this potential in 2008, in the objection to Planning Application 08/886 (land included in PAZ-12).

The author believes that Sligo can “*achieve its housing needs without zoning PAZ-11 and PAZ-12*” on Cairns Hill, a highly elevated location that forms part of a prestigious World Heritage Site bid. “*No one would dream of building a housing estate on the side of Knocknarae, which forms another core part of the WHS bid*”.

The submission includes a brief review of the process leading to the Draft Direction, reminds that the Sligo Neolithic Landscapes Group – who partnered with Sligo County Council to successfully add the landscape to Ireland’s Tentative World Heritage List – objected to the rezoning of PAZ-11 and PAZ-12, and that previous “*planning submissions*” on the land or land beside PAZ-11 and PAZ-12 have been refused. The Planning Authority’s stated reason for refusing permission under PL 08/886 (lands subject to PAZ-12) was as follows:

“It is the policy of the Planning Authority, as set out in the Sligo and Environs Development Plan 2004 -2010, to preserve and maintain the known archaeological monuments within Sligo and Environs and safeguard the integrity of archaeological sites and their settings. Having regard to the location and layout of the proposed development, it is considered that the proposal would impact negatively on the amenity and setting of National Monument SL 014-231. The proposed development would also impinge upon the constraints zone of National Monument SL 014-230 and in this context, it is likely that sub-surface remains and material of archaeological interest will be likely to be destroyed. The proposed development would materially contravene a policy of the Development Plan in respect of the protection of archaeological features and would therefore be contrary to the proper planning and sustainable development of the area. ”

In a submission on the same planning application, the Department of Environment, Heritage & Local Government commented as follows:

"The Archaeological assessment submitted takes a very site-specific approach to archaeological issues in this instance, focusing as it does on the footprint of the proposed development. It fails to make any reference to the implications of the development for county Sligo's premier archaeological complex. It is the view of the department that this site is not suitable for development from an archaeological viewpoint. Therefore, the Department of the Environment, Heritage and Local Government recommends that planning permissions should not be granted for this development."

Fáilte Ireland commented as follows:

"Given the importance of Sligo's archaeological heritage to the regional tourism industry and the visual amenity of Carns Hill, Fáilte Ireland wishes to object to the development."

An application for land adjoining PAZ-11 was also refused in 2009. PAZ -11 is at a higher elevation and closer to SL014-133 (Ringfort) and cairns SL014-23 and SL014-232 that were stated as reasons for refusal in 2009. The reasons for refusal include:

"It is the policy of the planning authority, as set out in the Sligo and Environs Development Plan 2004-10, to preserve and maintain the known archaeological monuments within Sligo and Environs and safeguard the integrity of archaeological sites and their settings. Having regard to the location and layout of the proposed development, it is considered that the proposed development would injure the historic remains and visual setting of Recorded Monument SL014-133. The proposed development would, therefore, injure and interfere with a historic monument which stands registered in the register of historic Monuments and would materially contravene a policy of the Development Plan."

It is considered that the proposed development on this exposed and elevated site would represent a strident and visually obtrusive feature in the landscape and result in the development being a prominent landmark clearly visible on the skyline when viewed over the area. It is considered that the development would interfere with the character of the landscape and would be contrary to the proper planning and sustainable development of the area."

Councillors subsequently voted to remove from the Draft County Development Plan 2010 a proposed road* (T2.11) that crossed the land from PAZ-12 to PAZ-11, as the land was deemed unsuitable for development.

[* Note: the proposed road objective was removed from the Draft Sligo and Environs Development Plan, not from the County Development Plan]

The submission states that *"there is significant and consistent evidence and precedent that the proposals to rezone PAZ-11 and PAZ-12 are unwise and constitute improper planning"*.

The author considers that *"the cultural and sacred landscape of Cairn Hill and the intervisibility with Knocknarae, Carrowmore should be preserved in line with expert recommendations"*.

The Minister's intervention is welcomed and the land in question *"should remain Green Space into the future"*.

Submission 97

<https://consult.sligococo.ie/en/submission/slg-c57-97>

Author: [Margaret Malarney](#)

The submission supports the rezoning of lands in Strandhill (PAZ-57), Hazelwood (PAZ-14 and PAZ-15), and throughout County Sligo. The author states that she is renting in the Sligo area *"with no option to buy a first home"*, because of the housing shortage, and that she will have to return to Australia *"where there is an adequate supply of affordable homes"*.

The author urges the Minister *"to consider the zoning of PAZ 57, 14 & 15 as well as all of the other proposed residential zoning locations as vital to the growth of Sligo and the Northwest"*.

Submission 98

<https://consult.sligococo.ie/en/submission/slg-c57-98>

Author: [Barry Whiite](#)

In relation to PAZ-57, the author states that *"the sites proposed for new residential zoning in Strandhill have been proposed for 3 development plan cycles (over 18 years) and have not delivered one single housing unit in this time frame"*.

Submission 99

<https://consult.sligococo.ie/en/submission/slg-c57-99>

Author: [Rachel Byrne](#)

The submission supports the rezoning of lands in Strandhill (PAZ-57), Hazelwood (PAZ-14 and PAZ-15), to meet the demand for housing in Sligo. The author states that she and her partner are living *"with both our parents at 30 years of age"*.

The author urges the [Minister?] *"to consider the zoning of PAZ 57 and PAZ 14,15 and any other site that will benefit the housing supply in Sligo"*.

Submission 100

<https://consult.sligococo.ie/en/submission/slg-c57-100>

Author: [Rory Kelly](#)

The submission supports the rezoning of lands throughout County Sligo, in particular in Strandhill (PAZ-57) and Hazelwood (PAZ-14 and PAZ-15). The author states that he is renting in the Sligo area *"with no option to buy a first home"*, due to the housing shortage, and that he will have to return to *"the UK and Belfast, where there is an adequate supply of affordable homes"*. If the author cannot secure a new home, he will not be able to open his own business in the near future.

The author urges the Minister *"to consider the zoning of PAZ 57, 14 & 15 as well as all of the other proposed residential zoning locations as vital to the growth of Sligo and the Northwest"*.

Submission 101

<https://consult.sligococo.ie/en/submission/slg-c57-101>

Author: [Gaven Heeran](#)

The submission supports PAZ-57, PAZ-14 and PAZ-15, indicating that *“there is an urgent requirement for housing in the Strandhill area”*. The author states that he has been looking for housing *“in both areas”* for several years, but no properties were available to purchase.

The author suggests that *“the site should now be released from SLR and zoned as New Residential in order to plan for the sustainable and proper development of Strandhill village and Hazelwood”*.

Submission 102

<https://consult.sligococo.ie/en/submission/slg-c57-102>

Author: [Helen Connaughton](#)

The submission supports the rezoning of lands in Strandhill and Hazelwood, i.e. PAZ-57, PAZ-14 and PAZ-15. The author notes the severe shortage of housing in Sligo, the negative impact on her family and friends, and mentions her brother *"who is 36 years of age still living at home with our parents due to the lack of housing"*.

The author urges [the Minister?] *"to allow the rezoning of these lands to assist in the growth of the town we love and wish to continue to live in"*.

Submission 103

<https://consult.sligococo.ie/en/submission/slg-c57-103>

Author: [Paddy Flynn](#)

The submission supports the rezoning of lands in both Strandhill and Hazelwood *“due to the lack of housing in Sligo and surrounding areas”*.

The author urges the Minister *“to consider the zoning of PAZ-57, 14 and 15 as well as all of the other proposed residential zoning locations as vital to the growth of Sligo and the Northwest”*.

Submission 104

<https://consult.sligococo.ie/en/submission/slg-c57-104>

Author: [Peter Clarke](#)

The submission is titled “PAZ-57, 14, 15” and states that “*we need more land for housing, absolutely crazy not to be zoning these lands*”.

Submission 105

<https://consult.sligococo.ie/en/submission/slg-c57-105>

Author: [Saoirse Faughnan](#)

The submission supports the zoning of lands under PAZ-14 and PAZ-15, as *"this site has the potential to deliver housing to serve students due to its location beside the colleges"*. The community facilities proposed as part of the development are needed for future generations.

Submission 106

<https://consult.sligococo.ie/en/submission/slg-c57-106>

Author: [Thomas Regan](#)

The submission is titled *"PAZ-57 and PAZ-14,15"* and states: *"More housing in Sligo and surrounding areas needed"*.

Submission 107

<https://consult.sligococo.ie/en/submission/slg-c57-107>

Author: McCabe Architects on behalf of Brendan and Aidan Gregory Feeney

The submission supports the zoning of the lands subject to PAZ-34 in Enniscrone, stating that the proposal reflects the objectives for sustainable tourism development outlined in the Sligo CDP 2024-2030 and complements plans for other tourism projects funded by the Department for Rural and Community Development.

Under the heading “*Context and Rationale for Rezoning*”, the consultant indicates that the proposed rezoning would facilitate “*eco-conscious tourism infrastructure and enhancing the village’s appeal*” by dividing the site as follows:

- “*Tourism Zone*” – 3.58 ha dedicated to eco- friendly accommodations;
- “*Buffer Zone*” – 1.38 ha allocated for carbon sequestration through native bush planting.

The submission lists the “*strategic benefits of the rezoning proposal*” as follows:

1. Economic growth and employment creation - 10–15 direct jobs in reception, housekeeping, and management, alongside indirect roles in local businesses such as restaurants, shops, and transport services.
2. Addressing tourism demand – enabling the establishment of accommodations designed for couples and families, meeting the rising demand for experiential tourism.
3. Revenue Generation – visitor spending estimated to contribute €350,000–€400,000 annually to the local economy.
4. Environmental Commitment – inclusion of a buffer zone for carbon sequestration and biodiversity preservation through the planting of native flora; integration of renewable energy systems and sustainable waste management practices.

Under “*Community alignment*”, the consultant mentions that “*Extensive consultation with stakeholders, including Mayo North Tourism and local hotel operators, indicates strong community support for the project*”.

The “*Key features of the proposal*” are described as follows:

- Eco-Conscious Tourism Infrastructure – Development of glamping accommodations that blend seamlessly into the natural environment; use of sustainable materials and energy-efficient designs to minimize ecological impact.
- Buffer Zone Management – planting of native shrubs to enhance biodiversity and carbon absorption; creation of leisure spaces that benefit both visitors and the local community.
- Phased Implementation –phased approach, beginning with 15–20 eco-pods for couples before expanding to accommodate families and larger groups.

“*Environmental and Traffic Considerations*” are also mentioned:

- Traffic management – estimated increase of 250–300 vehicles per day during peak seasons, to be managed “*through collaboration with local authorities to improve parking and road infrastructure*”.

- Sustainable practices – Renewable energy installations and water-efficient systems will reduce the environmental footprint; waste management strategies aiming to achieve a 60% recycling rate.
- Habitat preservation – Construction to minimize disruption of wildlife; post-construction landscaping to reintegrate native vegetation.

The submission states that *“this proposal has twice been approved by elected councillors”* and urges the Council to *“reconsider the rezoning decision and recognize the project’s potential to position Enniscrone as a leader in sustainable tourism”*.

Submission 108

<https://consult.sligococo.ie/en/submission/slg-c57-108>

Author: [Michael Conmy](#) (Bury Architects) on behalf of Bernard Fox

The submission supports the residential zoning of the lands subject to PAZ-33 in Enniscrone.

The consultant indicates that this is a brownfield site and that the developer (Pentico Ltd) is prepared to extend the sewer, which could also be used to service 30 one-off houses currently connected to individual septic tanks.

The submission includes extracts from previous Chief Executive's Reports, as well as maps, some extracted from the Draft CDP 2024-2030. It also includes a copy of Bury Architects' submission of 22 December 2023, as well as an unaddressed letter dated 24 September 2024, both supporting residential zoning of the subject site.

Submission 109

<https://consult.sligococo.ie/en/submission/slg-c57-109>

Author: [Michael Conmy](#) on behalf of Blackmud Developments

The submission supports the zoning of the lands subject to PAZ-9 for “*domestic house construction*”.

The agent, Michael Conmy (Bury Architects) indicates that, while Irish Water advised the Council that the site was not serviced, this is incorrect, as the existing 18-houses estate is connected to “*all essential services which includes a mains sewer, mains surface water, mains water, broadband and ESB*”.

There are three further documents enclosed with this submission:

- **The submission on the Draft Plan**, made on 30 November 2023 by Bury Architects, indicating that:
 - Under Planning Permission 04/1514 the Council Granted Permission for a residential development on all of the site.
 - Only part of the site was developed due to the economic downturn, this area was retained in 2020 under PL 20/369. A condition of the Planning Permission was that the client had to pay for a new footpath to connect the site to the existing public footpath network. This work is now paid for.
 - Under Planning Ref PL04/1514 18 no. houses were constructed on this site. Site Development works were also carried out for a further 40 no. houses.
 - A main sewer and a surface water drain was laid from the site to the Council main on the Hazelwood Road, the R286.
 - The sewers laid has capacity to service in excess of 120 houses.
 - Blackmud Ltd have paid for the construction of a foot path up to the site entrance. On site the access road and paths are 80% complete.
 - With the level of costs committed to this Development, it is essential that the zoning is changed to Residential.
 - The Council have always encouraged development in services areas, because the presence of services reduces the capital cost of constructing housing and developers see returns in their investments in real time.
 - The site in question will only benefit Sligo town if our proposed rezoning to new residential is accepted.
 - As outlined above, the site is already situated adjacent to a residential development with connections to all services in situ. A pedestrian walkway, which was requested by the Council under Planning Permission 04/1514, has been paid for by the developers.
 - The client has followed every request by the Council to get developments started on the site. It has caused great disappointment to discover that the site has been designated as 'Strategic Land' and 'Open Space', we understood that residential development would be possible on the site.
 - Any new application on the remaining land will include its own proposals for the provisions of 'Open Space' based on its layout.

- The rezoning of this site to new residential would benefit the surrounding area as there is ample open space surrounding the site in the Green Belt.
 - Leaving it in a Strategic Land Reserve is tying up a huge investment in infrastructure for many years.
 - The underutilization of services installed on this site in the last twenty years, if not used, represents a huge waste of money, particularly at a time when people are crying out for affordable housing.
- **The submission on the Proposed Amendments**, made on 25 September 2024 by the same agent, indicating that:
- Planning Permission PL04/1514 Granted on the 26th October 2005 for the construction of 76 no. dwelling houses
 - Planning Permission PL0S/70160 Granted on the 28th of May 2006 for the construction of 11 no, dwellinghouses.
 - Planning Permission for Retention, PL20/369 Granted on the 27th of July 2022 with expiry on the 26th of July 2027.
 - To date 18 no. dwelling houses have been constructed on site and on the 1st March 2021 a watermain was installed and connected to the Farranacardy reservoir for the site in a 200 mm diameter mains supply.
 - As a requirement of Planning Permission PL04/1514, this 200mm diameter watermain was installed on the site and terminated on the R278 Public Road at the entrance to the site for Sligo County Council use and Uisce Eireann use.
 - The terminating T has 2 no. off take spurs of 150mm diameter and a fire hydrant connection.
 - The watermain extension was overseen by Mr. Joe O'Connell Engineer, of Sligo County Council. Mr O'Connell also supervised and passed the testing of the said mains. These facts were communicated to Mr Frank Moylan Senior Planner at meeting of the 21st of November 2022 in the Town Hall.
 - It is further confirmed that the 300 diameter sewers, 600 diameter & 300 diameter surface water mains pipework and connecting 100mm diameter pipework in excess of 3600 linear metres are installed on this site. They are connected to the public main system on the R278 public road and have all the relevant wayleaves in place underpinning this pipe services route network.
 - In response to Simon Deale of DHLGH and the submission 94 (slg-C44-84), which stated that "the department has concerns that this holding contains areas of natural habitats and ecological corridors, including hedgrows, scrub woodland potentially species rich grassland", Blackmud Developments responded that they acquired this site in 2023, this was a brownfield site with no vegetation.
 - As part of the rehabilitation of this derelict brownfield site and in consultation with the Planning Department of Sligo County Council, the Council required the site to be restored from brown to greenfield insofar as was possible to increase the image of the site in the background to the existing 18 no. constructed dwelling houses and the two attendant sites.

- Blackmud Developments Ltd reseeded the selected areas with suitable grass seed and native scrub to enable restoration of a natural visual environment. This was a requirement of our Landscape Consultant to prevent the leeching of fine soil sediment and the requirement to reintroduce soil bacteria removed when topsoil was stripped.
 - Blackmud Developments will develop the site in recognition of the natural environment and will incorporate those characteristics in the new developments.
- **A letter from Bury Architects to Sligo County Council**, dated 4 November 2024, relating to the OPR's Proposed Direction of 27 October 2024, indicating that:
- the site in Calry, owned by Blackmud Developments Ltd, has an area of 6.09 hectares, it is fully developed and has 18 no. houses complete.
 - Site services are in place and the Council have contracted to extend a public footpath to it later this year.
 - OPR acknowledge that the lands are fully serviced, and the site is only 800 metres from ATU which needs accommodation for staff and students.
 - In light of this information, the Council should consider the inclusion of the above lands in the County Development Plan.

Submission 110

<https://consult.sligococo.ie/en/submission/slg-c57-110>

Author: [Aine Nic Amhlaidh](#)

The submissions “*supports the refusal of rezoning of PAZ-57*” for the following reasons:

- The wastewater treatment plant has been non-compliant since construction with the release of dangerous levels of Nitrites.
- The Environmental Impact Assessments for looped trails in Strandhill were not completed.
- There is a concern that the impact of the Strandhill Market, the looped trails as well as the Caravan Park on the WWTP has not been assessed.
- The current planning application on the site was refused by both Sligo County Council and refused on appeal to An Bord Pleanála.
- This site is unserviced and is outside the scope of sequential residential development.
- The site has not been assessed for the presence of the whorl snail which can only be fully assessed during the summer.
- The developer claims to have fully assessed the site for Archaeological significance. The Archaeology Report clearly states that most of the site was inaccessible and was excluded. The site immediately beside this site uncovered middens in 2023.
- The elected members of Sligo County Council are obliged to act in long term common good under the Planning Act 2000.
- The residential development and proposed development density of this site would endanger the lives of vulnerable children.

Sligo County Council is requested to refuse this rezoning as well as PAZ-58 and PAZ-56.

Submission 111

<https://consult.sligococo.ie/en/submission/slg-c57-111>

Author: [Michael Conmy](#) (Bury Architects) on behalf of Fergal Cawley

The submission supports the residential zoning of the lands subject to PAZ-31 in Enniscrone.

The consultant indicates that there is a sewer in the area, serving the Diamond Coast Hotel and 50 houses across the road from the site.

The submission states that the landowner intends to develop the site to help address the *"huge demand for housing"* in Enniscrone.

Bury Architects also include the submission on the Draft CDP (dated 28 November 2023), extracts from the Enniscrone Local Area Plan 2004, Enniscrone LAP 2014, the Draft CDP 2024-2030, Chief Executive's Reports and an unaddressed letter dated 25 September 2024 which *"appeals"* the *"decision"* to recommend the making of the CDP without PAZ-31.

Submission 112

<https://consult.sligococo.ie/en/submission/slg-c57-112>

Author: [Owen McKirdy](#)

The submission objects to the rezoning of land from Green Belt to nRES (residential) under PAZ-56. The main points are summarised below:

- The rezoning is NOT consistent with the core strategy of proper planning and sustainable development, does not conform with the sequential approach and is not compliant with the NPF, particularly NPO 3(c) - compact growth.
- Councillor MacSharry ‘contravened the decision of the Planning Executive and all the Environmental Reports as well as the Office of the Planning Regulator’s Recommendations. This is outside of his legal remit’.
- This site is extremely low lying and is classified on the geological survey of Ireland map as ‘High Ground Water Vulnerable’.
- The site is in a peripheral location outside the CSO settlement boundary and is not fully serviced or serviceable during the six-year period of the CDP 2024 – 2030. The public sewer does not extend to the lands and there is no present commitment by Uisce Eireann to provide the required wastewater structure. In accordance with the National Policy Objective 72c (NPF), land that cannot be serviced within the life of the plan should not be zoned for development.
- The site is located in a cul-de-sac which has no footpaths and a blind corner which presents a safety issue for current and potential future residents.
- The site does not accord with the ‘mandatory objectives for sustainable settlement and transport strategies as noted by the OPR SCC Chief Executive’.
- **CDP Section 33.2.2 Impact of development on its surroundings** is quoted in the submission. The submission notes that these factors have been completely ignored and are a mandatory obligation in the planning process.
- **CDP Section 33.2.7 On-site wastewater treatment systems** is quoted as stating that ‘new development is obliged to connect with the urban wastewater treatment plant’. When a new urban wastewater treatment plant is constructed or existing plants are upgraded, new developments will be required to connect into these plants. Public wastewater infrastructure must be in place and must have adequate capacity prior to developments being occupied.
- Elected Officials are legally obliged not to take into account matters not relating to the proper planning and sustainable development in the performance of planning functions. Thus, it is argued that this proposed rezoning is outside of the remit of the Elected Officials.
- Sligo County Council must adhere to legislation and the recommendations of the OPR when a breach has been identified.
- The submission includes the heading **‘VARIOUS STAKEHOLDERS REPONSES TO DATE TO PAZ-56:’ where comments from the SEA, Chief Executive Reports and the OPR/UE are set out:**
 - The Strategic Environmental Assessment (SEA) – June 2024 identifies that PAZ-56, PAZ-57, PAZ-58 “would not provide the most evidence-based framework for development and would the potential to undermine sustainable development and proper planning” and as having the potential to ‘probably Conflict with status of SEOs – unlikely to be fully mitigated.’

- The Chief Executive, in initial, subsequent and final reports, did not support this amendment stating “the subject lands are neither fully serviced (Tier 1), nor serviceable during the six year period of the CDP 2024 – 2030 (Tier 2).
 - Uisce Eireann/ Irish Water – July 2024 stated when “available network information indicates network extensions may be required. Those that require long network extensions (more than 150m) include PAZ-56.
- The submission requests that the Chief Executive adhere to the legislation and not zone PAZ-56 residential due to the concerns highlighted above.

Submission 113

<https://consult.sligococo.ie/en/submission/slg-c57-113>

Author: [Arianna McKirdy](#)

The submission objects to the rezoning of land from Green Belt to nRES (residential) under PAZ-56. The main points are summarised below:

- The rezoning is NOT consistent with the core strategy of proper planning and sustainable development, does not conform with the sequential approach and is not compliant with the NPF, particularly NPO 3(c) - compact growth.
- Councillor McSharry ‘contravened the decision of the Planning Executive and all the Environmental Reports as well as the Office of the Planning Regulator’s Recommendations. This is outside of his legal remit’.
- This site is extremely low lying and is classified on the geological survey of Ireland map as ‘High Ground Water Vulnerable’.
- The site is in a peripheral location outside the CSO settlement boundary and is not fully serviced or serviceable during the six-year period of the CDP 2024 – 2030. The public sewer does not extend to the lands and there is no present commitment by Uisce Eireann to provide the required wastewater structure. In accordance with the National Policy Objective 72c (NPF), land that cannot be serviced within the life of the plan should not be zoned for development.
- The site is located in a cul-de-sac which has no footpaths and a blind corner which presents a safety issue for current and potential future residents.
- The site does not accord with the ‘mandatory objectives for sustainable settlement and transport strategies as noted by the OPR SCC Chief Executive’.
- **CDP Section 33.2.2 Impact of development on its surroundings** is quoted in the submission. The submission notes that these factors have been completely ignored and are a mandatory obligation in the planning process.
- **CDP Section 33.2.7 On-site wastewater treatment systems** is quoted as stating that ‘new development is obliged to connect with the urban wastewater treatment plant’. When a new urban wastewater treatment plant is constructed or existing plants are upgraded, new developments will be required to connect into these plants. Public wastewater infrastructure must be in place and must have adequate capacity prior to developments being occupied.
- Elected Officials are legally obliged not to take into account matters not relating to the proper planning and sustainable development in the performance of planning functions. Thus, it is argued that this proposed rezoning is outside of the remit of the Elected Officials.
- Sligo County Council must adhere to legislation and the recommendations of the OPR when a breach has been identified.
- The submission includes the heading **‘VARIOUS STAKEHOLDERS REPONSES TO DATE TO PAZ-56:’ where comments from the SEA, Chief Executive Reports and the OPR/UE are set out:**
 - The Strategic Environmental Assessment (SEA) – June 2024 identifies that PAZ-56, PAZ-57, PAZ-58 “would not provide the most evidence-based framework for development and would the potential to undermine sustainable development and proper planning” and as having the potential to ‘probably Conflict with status of SEOs – unlikely to be fully mitigated.’

- The Chief Executive, in initial, subsequent and final reports, did not support this amendment stating “the subject lands are neither fully serviced (Tier 1), nor serviceable during the six year period of the CDP 2024 – 2030 (Tier 2).
 - Uisce Eireann/ Irish Water – July 2024 stated when “available network information indicates network extensions may be required. Those that require long network extensions (more than 150m) include PAZ-56.
- The submission requests that the Chief Executive adhere to the legislation and not zone PAZ-56 residential due to the concerns highlighted above.