



Sligo County Council
Comhairle Chontae Shligigh

Sligo.



First Chief Executive's Report

on pre-draft submissions and observations
on the review of the development plan
and preparation of the Sligo CDP 2023-2029

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Section 1

Commencing the review of Sligo County Development Plan

A development plan is a document that sets out an overall strategy for the proper planning and sustainable development of an area. The legal basis for the process of making a development plan is set out in the Planning and Development Act 2000 (as amended).

In accordance with current legislation, not later than four years after the making of a development plan, a planning authority must give notice of its intention to review its existing development plan and to prepare a new development plan for its area.

Four years after adopting the CDP 2011-2017, Sligo County Council commenced the review of its Development Plan in July 2021. This is a two-year process that will result in the preparation and adoption of a new CDP for the period 2023 to 2029.

The planning legislation allocates a substantial amount of time to public consultation, a minimum of 22 weeks divided between three stages – pre-draft consultation, consultation on the draft plan and consultation on proposed amendments to the draft plan.

1.1 Pre-draft consultation

The CDP review commenced formally on Friday, 30 July 2021, with the publication of statutory notices in local newspapers and on the County Council's website. As part of the pre-draft public consultation on the review of CDP and the preparation of a new Plan, the public was invited to make written submissions during a period of eight weeks, between 30 July and 24 September 2021.

To assist those who wanted to participate in public consultation, the Development Planning Unit prepared a brief **Pre-Draft Consultation** document. The document continues to be available for viewing and download from the County Council's website at www.sligococo.ie/cdp and from the Council's consultation portal at <https://consult.sligococo.ie/en/browse>

In total, 90 submissions were received before the deadline, with only one late submission. There were 17 submissions from prescribed state or semi-state bodies and 73 submissions from individuals, community groups and other private or public organisations/companies.

The submissions received as part of the pre-draft consultation on the CDP raise a wide range of issues, from transport and other critical infrastructure, climate change adaptation, renewable energy, urban regeneration and housing to the provision of community, cultural or recreational facilities, as well as the protection of sensitive landscapes, biodiversity, built heritage etc.

Many issues, from requests for tax exemptions to demands for inclusion of information specific to other organisations' plans (e.g. Failte Ireland's tourism-related mapping and branding), cannot or should not be addressed in a development plan. Other issues, which are better addressed in the Local Economic and Community Plan (LECP), have been brought to the attention of the team in charge of preparing the Sligo 2030 Strategy/new LECP.

Some state bodies have recommended the employment of specialist staff, such as an Architectural Conservation Officer, an Archaeologist (DHLGH) or a Biodiversity Officer (The Heritage Council), in order to ensure the appropriate implementation of national policy. These recommendations are noted.

1.2 First Chief Executive's Report – statutory framework

In accordance with planning legislation, the Chief Executive's Report must:

- a. list the entities or persons who made submissions or observations;
- b. summarise the issues raised in submissions;
- c. give the response of the Chief Executive to the issues raised, taking account of the proper planning and sustainable development of the area, the statutory obligations of the local authorities in the area and any relevant policies or objectives for the time being of the Government or of any Minister of the Government
- d. state the Chief Executive's recommendations on the policies to be included in the draft development plan.

The **Draft Development Plan Guidelines for Planning Authorities** (August 2021), issued by the Minister for Housing, Local Government and Heritage under Section 28 of the Planning Act, indicate that the Report should thematically group and summarise issues highlighted in the submissions received, instead of giving a response to each individual submission. The Report must give the Chief Executive's opinion on the issues raised, together with recommendations for policies to be included in the Draft Plan.

There are three exceptions to the above rule. The Chief Executive's Report must specifically summarise and address the issues raised in the submissions made by the relevant **Regional Assembly**, by the **Office of the Planning Regulator** and by the **Minister for Housing, Local Government and Heritage**.

A new Specific Planning Policy Requirement, **SPPR DPG2** (published in the Draft Development Plan Guidelines), demands that "The Chief Executive's stated recommendations on policies to be included in a development plan as part of a Report on Pre-Draft stage submissions, shall include a 'draft core strategy', consistent with Section 11(4)(d) of the Planning Act".

1.3 Structure of this Report

Section 2 of this report contains the detailed summaries of Submissions no. 57 (NWRA), 46 (DHLGH) and 76 (OPR), including the Chief Executive's opinions and recommendations in relation to the specific issues raised in these submissions.

Section 3 addresses the issues raised in the submissions received from prescribed bodies, other than the NWRA, the DHLGH and the OPR. The Chief Executive's opinion and recommendations are presented after each of the three summaries.

Section 4 of this report presents the summaries of issues raised in all other submissions, grouped by general theme, e.g. "Population growth and housing development", "Transport and sustainable mobility", "Climate action and energy" etc. The Chief Executive's opinion and recommendations are included at the end of each thematic group.

Section 5 of this addresses the requirement of SPPR DPG2 (mentioned above) regarding the inclusion of a "draft core strategy" in the First Chief Executive's Report (this report)

Section 6 lists the persons and organisations that made submissions and observations in relation to the review of the CDP.

The **Appendix** contains a list of state bodies notified of the review and invited to make pre-draft submissions in relation to the CDP.

1.4 What happens next?

Following the receipt of this Chief Executive's Report, the members have up to 10 weeks (and 9 additional days over the Christmas period, as specified in the Planning and Development Act), i.e. by 11 March 2022, to issue their directions to the Chief Executive regarding the preparation of the Draft Development Plan.

These directions must be strategic in nature, consistent with the "draft core strategy" (i.e. the requirements listed in Section 5 of this Report), as well as taking account of the statutory obligations of the Local Authority and any relevant policies or objectives of the Government or of any Minister of the Government.

The Chief Executive is obliged to comply with these directions, where **valid**.

The Development Planning Unit and the Senior Planner will be available to provide assistance to elected members in formulating the wording of directions, to ensure that they are strategic, relevant and therefore valid.

It is important to note that this is just the first of several stages at which the members are required to make an input into the preparation of the Plan.

Sligo County Council must adhere to the statutory process set out in the Planning and Development Act 2000 (as amended). A summary of this process is provided on the next page. Stages that have already been completed are indicated in *blue italics* and stages that directly involve the elected members are indicated by **green bold type**.

Development Plan process

1. *Give notice of Development Plan review to the public and the prescribed bodies (30 July 2021)*
2. *Pre-draft consultation (30 July to 24 September 2021)*
3. *First Chief Executive's Report on submissions and observations submitted to members (22 December 2021)*
4. **Members direct the Chief Executive to prepare the Draft CDP 2023-2029 (by 11 March 2022)**
5. Preparation of Proposed Draft Plan
6. **Consideration of Proposed Draft Plan by members**
7. **Members may accept or modify the Proposed Draft Plan**
8. Give notice of publication of the Draft Plan to the public and the prescribed bodies
9. Put Draft Plan on public display and invite submissions (minimum 10 weeks)
10. Second Chief Executive's Report on submissions and observations submitted to members
11. **Members may wish to amend the Draft Plan or accept the Manager's recommendations and make the Plan without further amendments**
12. If the proposed amendments are a material alteration of the Draft Plan, publish notice (additional time will be required for carrying out SEA and AA of the proposed amendments)
13. Put the proposed amendments on public display and invite submissions (minimum four weeks)
14. Third Chief Executive's Report on submissions and observations submitted to members
15. **Members make the Plan with or without the proposed amendments**
16. Publish notice that the new Plan is made
17. The new CDP becomes operational four weeks after its adoption

Section 2

Submissions made by the Minister for Housing, Local Government and Heritage (HLGH), the Northern and Western Regional Assembly (NWRA) and the Office of the Planning Regulator (OPR)

Section 11 of the Planning and Development Act 2000 (as amended) requires that the Chief Executive's report summarises the issues raised and the recommendations made by the Office of the Planning Regulator and the Northern and Western Regional Assembly, and outline the recommendations of the Chief Executive in relation to the manner in which those issues and recommendations should be addressed in the draft development plan.

In addition, the Draft Development Plan Guidelines (2021) recommend that the issues raised in the Minister's submission be addressed at pre-draft stage, given that the legislation requires separate consideration at later stages in the process.

The issues outlined in the three above-mentioned submissions are summarised in the following subsections. Where specific policy recommendations were received, these are quoted in full.

In response to each issue of each submission, the Chief Executive has provided his opinion and, where required, his recommendations relating to the preparation and content of the Draft CDP 2023-2029.

2.1 Submission 46 – Department of Housing, Local Government and Heritage (DHLGH)

The Department's submission consists of observations and recommendations (co-ordinated by the Development Applications Unit) in relation to **nature conservation** (climate change and biodiversity, green infrastructure, water quality, wetlands, invasive species, light pollution) and **architecture** (built heritage, cultural landscapes, vernacular architecture, historic towns and villages revitalisation, tall buildings in historic urban centres, adaptation to climate change, sustainability and energy efficiency).

After setting out the national policy framework dealing with the above, the Department/DAU provides a wealth of detailed advice in relation to County Sligo's heritage and makes specific recommendations for policies and objectives that should be included in the Draft CDP 2023-2029.

The recommended policies, objectives and other Draft Plan provisions are listed below. The Chief Executive's response is provided **in purple type** after each set of ministerial recommendations.

2.1.1 Nature conservation

- Ensure all developments arising from this plan include measures to conserve, protect and enhance biodiversity.
- Support the aims of the National Biodiversity Action Plan 2017-2021 and County Sligo Heritage Plan 2016 -2020 and any subsequent plans in this regard over the lifetime of this plan.

Environmental assessments

- Ensure all downstream plans and projects arising from this plan will be required to undertake Appropriate Assessment (AA), Strategic Environmental Assessment (SEA), Environmental Impact Assessment (EIA) and Ecological Impact Assessment (EclA) as required and appropriate.
- Biodiversity data generated, during the lifetime of this plan, for the preparation of environmental assessment reports (e.g. ER, EIAR, NIS/NIR or EclA) shall be submitted to the National Biodiversity Data Centre (NBDC).

Nature conservation within and outside designated sites

- Natural heritage objectives should be clear and robust, and there should be an objective to protect, conserve and enhance biodiversity both within and outside protected sites.
- The CDP should provide a list of proposed Natural Heritage Areas within the county with a clear objective to protect and conserve these sites of high nature value.
- The Draft CDP should include an objective whereby all public buildings and public open spaces in the county incorporate positive biodiversity measures as standard practice. Actions can include simple measures, e.g. all new public buildings incorporate nesting boxes for swifts, bat boxes and/or bat bricks, the creation of wildlife habitats on public open spaces, to more ambitious measures that will ensure 'biodiversity net gain' in public development schemes.
- Ensure the conservation and protection of all areas of high biodiversity value within the county, (e.g. European and Nationally designated sites, Statutory Nature Reserves, Refuges for Fauna, Ramsar Sites and proposed Natural Heritage Areas).
- Promote the objectives of the National Pollinator Plan 2021-2025 and in particular within local authority managed or owned lands.

Climate change and biodiversity

The Department indicates that "the Draft CDP should set out a policy framework for development projects and plans within Sligo's coastal zone (i.e. within the council's remit). This framework should consider the context of rapidly changing environmental conditions, legal obligations under SEA, EIA and AA for the protection of designated sites and habitats and/or species of nature conservation interest as well as the protection of biodiversity in the coastal zone as stipulated by the National Biodiversity Action Plan 2017 – 2021". Recommended policies are as follows:

- Protect, restore and enhance biodiversity to increase the resilience of natural and human systems to climate change, with greater consideration given to nature-based solutions.
- Develop a framework where all developments, (including local authority developments), within Sligo's coastal zone will adequately consider changing environmental conditions due to climate change, legal obligations under SEA, EIA and AA for the protection of designated sites, habitats and/or species of nature conservation interest as well as the protection of biodiversity in the coastal zone as stipulated by the National Biodiversity Action Plan 2017 – 2021.

Green infrastructure

- In order to address the main drivers of biodiversity loss, the Department indicates that developments should avoid the fragmentation of landscape features, including ecological corridors which allow for the mobility of species in a changing climate.
- The Draft CDP should include the objective that all hedgerows will be retained (subject to appropriate long-term management) in any new development and where removal is absolutely

necessary, that the same length of compensatory hedgerow will be planted using appropriate native species.

- The promotion of GI should be integrated into developments in larger urban centres, with a commitment to reverse the loss of green urban ecosystems.
- The Department would welcome a commitment in the CDP to develop a Green Infrastructure Strategy for the county (i.e. a network of natural areas), in accordance with the EU Strategy on Green Infrastructure. The GI Strategy should include clear objectives with regard to the protection of trees, hedgerows and other habitats which contribute to GI in the county.
- Ensure the protection and enhancement of biodiversity and ecological networks within the plan area in accordance with Article 10 of the Habitats Directive. This will ensure landscape features, which act as ecological corridors and stepping stones, will improve the overall coherence of the Natura 2000 network and biodiversity in general.
- Ensure biodiversity and nature conservation interests are fully incorporated into route/site selection processes during the development of Greenways, Blueways and Peatways.

Threats to nature conservation

- Ensure all developments arising from the plan adhere to the concept of sustainable development and no developments will be permitted that adversely impact on the integrity of European designated sites (Special Areas of Conservation and Special Protection Areas) and biodiversity in general.
- Control and prevent the spread of Invasive Alien Species (IAS), all developments, where IAS is a known threat, will be required to provide an IAS management plan as part of the planning process and to comply with the provisions of the European Communities Birds and Habitats Regulations 2011, as amended.
- Develop a public lighting policy for the county that will ensure proposals to upgrade or expand artificial lighting will consider the impacts to biodiversity and climate change.
- Ensure development on wetlands, including peatlands, are subject to the requirements of the planning code as provided for in the Planning and Development Act, 2000 (as amended) and the Planning and Development Regulations, 2001 (as amended) and environmental assessment in this regard.
- Support the aims of the National Peatlands Strategy and the implementation of the National Raised Bog Special Areas of Conservation Management Plan 2017-2022.

Monitoring the impacts of the Plan on biodiversity

The Department indicates that “Monitoring can use existing sources of information including data collected by other government departments or agencies but the loss or enhancement of biodiversity due to development can only be adequately monitored and recorded through the planning process.

The Department would welcome a clear and specific monitoring plan to be included with the Strategic Environmental Report that would clearly outline how it is proposed to record the impacts of plan implementation on biodiversity, both in terms of biodiversity loss and biodiversity enhancement during the lifetime of the plan. The Department would also welcome the publishing of such reports.

The recommended wording for such objective is as follows:

Monitor and record biodiversity loss and enhancement as a result of any development proposals arising from plan implementation and ensure such reports are available for public inspection.

Chief Executive's opinion

Chapter 7.1 of the current Sligo CDP 2017-2023 contains the County Council's policies and objectives relating to Natural Heritage and Biodiversity. The vast majority of the policies and objectives recommended by the Minister are already included in the CDP.

All the narratives, policies, objectives and development management standards will be revised and updated to ensure consistency with the most recent national policy documents, in particular the National Biodiversity Action Plan 2017-2021 (and any subsequent revisions).

Additional provisions should be included in the Natural Heritage chapter of the next CDP, in accordance with the Minister's recommendations.

CE-1 – Chief Executive's recommendations on nature conservation

The following additional provisions should be considered when drafting the CDP 2023-2029:

- A. an objective requiring new developments (public and private) and public open spaces in the county to incorporate positive biodiversity measures as standard practice;
- B. appropriate narrative, policies, objectives and development management standards relating to Green Infrastructure, including a commitment to develop a Green Infrastructure Strategy, as recommended by the Minister;
- C. consider the establishment of a monitoring system designed to record biodiversity loss and/or enhancement as a result of any development proposals arising from plan implementation.

2.1.2 Architecture and built heritage

The Department recommends that built heritage is considered as an integral part of the wider built environment and should be dealt with holistically throughout the development plan. Key national policy documents, which are currently being prepared or renewed, are:

- (Draft) Heritage Ireland 2030;
- Climate Change Sectoral Adaptation Plan for the Built and Archaeological Heritage;
- Built Vernacular Strategy;
- National Policy on Architecture (pending)

The Department suggests that the policies and objectives of the above core documents should be inserted in the future development plan, where possible.

It is indicated that there are a number of "new areas of interest" that require greater attention and focus in development plans. These areas of interest are listed below. Detailed guidelines are yet to be published.

- a. **National Policy on Architecture (NPA)**, due to be published in 2021
- b. **Heritage Ireland 2030** (pending)
- c. **National Inventory of Architectural Heritage** to include cultural landscapes, vernacular architecture and early urban buildings
- d. **Built Vernacular Strategy** (pending)
- e. **Pleasure landscape** (policies for planned/ designed landscapes)

- f. **Climate Change Action** (delivering built heritage resilience and sustainability as part of the overall response to climate change)
- g. **Town revitalisation** (enhanced policies for heritage-led urban regeneration)

Local Authority Climate Change Adaptation Strategy

Under the Climate Action and Low Carbon Development Act 2015, the Department prepared a climate change adaptation sectoral plan for the Built and Archaeological Heritage and engaged with the Climate Action Regional Offices (CAROs) through a Climate Change Advisory Group to ensure a consistent approach to protection and adaptation of heritage across the country.

It is recommended that the Council, in preparing the Local Authority Adaptation Strategy, take into account a number of issues regarding the protection of architectural heritage.

Revitalising the historic urban centres of towns and villages

Under the above heading, the Department recommends a number of policies for inclusion in the Draft CDP 2023-2029 and specific measures or actions to be carried out as part of its preparation:

- To consider **concepts of historic urban landscapes** as a collection of buildings at the various scales of settlement, the origins of Irish cities, towns and villages which give rise to their special characteristics. These include setting, topography and natural features.
- To support the conservation and reuse of early traditional structures, roofscapes of historic centres and the recognition of interrelationships between sites and landscape features in terms of the insertion of new buildings and managing their impact on the historic environment.
- To consider a **Town Centre First approach** to the revitalisation of historic urban centres, the appointment of a Local Authority multi-disciplinary team which communicates the historical, architectural context and focuses on the repair and upgrade of existing historic buildings and their adaptation to new uses with regard to their architectural character and significance.
- To promote the development of heritage-led regeneration, to plan for the reuse and conservation of core built heritage and archaeological sites within urban centres as an integral part of the evolution of the historic place and its significance.
- To consider the identification of a **“built-heritage-at-risk register”** as the basis for actively managing, attracting funding and resources, drawing on the legislative provisions to safeguard protected structures and their setting, i.e. enabling works to ensure their long-term survival, appropriate “moth-balling” and inspection to prevent further deterioration or loss.
- To promote best conservation practice and to lead by example through the management and safeguarding of historic properties in the ownership of the Local Authority.
- To support the development of **sustainable infill to the town backlands that is appropriate in scale and character to that of the historic centre**, that transitions and accommodates surviving structures and retains the historic streetscape form particularly within sensitive areas of built and archaeological importance.
- To ensure that strategic housing developments support rather than detract from the vitality and overall character of historic town centres in terms of their scale, connection and mobility strategies.
- To draw on the historic environment viewer, to compile core data information about the built and archaeological evolution of historic places, to draw on the readily accessible resources such as historic mapping and databases, i.e. to inform future development strategies and progress based on an awareness of the cultural significance of a place.

- To coordinate significant infrastructural projects such as public realm works, flood relief works or new transport routes and alternative modes of transport to the benefit of surviving historic sites, in order to improvement their enjoyment, presentation and enhanced accessibility. (The Department notes examples from European cities of the removal of traffic from urban centres and the resulting improvement in air quality.)

Vernacular buildings

Under the above heading, the Department's letter provides a detailed description of the vernacular architecture's main characteristics and importance to Irish settlements. Recommendations are made for appropriate narrative and policies to be included in specific sections of the Draft Plan, as follows:

In the high-level introduction to development plan

- Recognize that vernacular buildings are characteristic of our local communities and environments and contribute to their authenticity, and to their cultural, traditional, architectural, archaeological, historical and social interest and diversity.
- Promote the appropriate rehabilitation, revitalization and reuse of vernacular buildings, wherever feasible, employing best conservation practice and using traditional, especially vernacular, building methods and materials.

Climate change and sustainability/energy efficiency

- To recognize the inherent sustainability of vernacular buildings by virtue of their use of natural and renewal materials of local origin.
- To ensure the continued sensitive and appropriate rehabilitation and reuse of vernacular buildings in the interest if sustainability.
- To ensure the conservation and reuse of traditional materials in the interest of sustainability, good conservation practice and maintaining the long-term viability of such buildings and their associated features.
- Where permission is sought to demolish a vernacular building on the grounds of structural defects or failure, or that it is not reasonably capable of being made structurally sound, such a contention must be convincingly demonstrated through a detailed report on the existing condition produced by a professional with appropriate conservation expertise and an understanding of vernacular buildings. As part of such justification, details will be required of remedial works normally used in similar circumstances and setting out why these would not be appropriate.
- Where a building has been destroyed by fire or accident, the Council may consider demolition to be appropriate. A report by a professional with appropriate conservation expertise, specifying the cause and extent of damage, will be required. As a minimum, a vernacular building proposed for demolition should be fully recorded to an agreed professional standard.
- If a disused vernacular house is demolished or replaced with a replica, the Rural Settlement Strategy will apply.
- Ensure that measures to upgrade the energy efficiency of vernacular buildings acknowledge their inherent vernacular characteristics, techniques and materials and do not have a detrimental physical or visual impact.
- Promote and support appropriate and well-informed energy efficiency upgrades to vernacular buildings through the dissemination of factual and relevant information to the general public.

Rural development, farm diversification, tourism

- Encourage and facilitate the sensitive reuse of vernacular houses or farm buildings for farm diversification, agri-tourism and rural development, including self-catering accommodation, arts or craft workshops and small-scale manufacturing.

The Department indicates that guidance and information in this regard can be found in *Traditional Buildings for Irish Farms* (2005) published by the Heritage Council and Teagasc, and *Reusing Farm Buildings: A Kildare Perspective* (2006) published by Kildare County Council.

Architectural heritage conservation

A range of policies, objectives and development management standards are recommended as follows:

- Protect, maintain and enhance the established character and setting of vernacular buildings, farmyards and settlements. Development proposals affecting vernacular buildings will be required to be accompanied by a detailed measured survey, photographic record and written report carried out by a professional with appropriate conservation expertise and an understanding of vernacular buildings. Early consultation with the planning authority is strongly advised.
- Facilitate appropriate, high-quality design solutions for adaptations of vernacular buildings that carefully consider their vernacular qualities in terms of design, scale, setting and finishes. While new design can be expressed in contemporary architectural language, consideration should be given to exploring the use of appropriate vernacular features, building techniques and materials.
- Where it is proposed to extend a vernacular house, the design, scale, footprint and materials should be sympathetic to the existing building and its setting. Extensions should generally be located to the rear and not obscure the form or layout of the existing building; substantial removal of walling is not generally recommended; connecting the existing building and extension should minimize the number of new openings and ideally use existing openings; sometimes, an outbuilding contiguous to a dwelling can be successfully incorporated.
- Promote the protection and maintenance of the character and setting of vernacular buildings, farmyards and settlements, including historic gateways, boundaries and other features.
- Ensure that developments proposed within or adjacent to vernacular settlements respect and enhance their spatial character, building forms, features, details and materials.
- Promote the protection and maintenance of thatched buildings (domestic or non-domestic), particularly those with historic layers and roof structures.
- Maintain an up-to-date record of thatched buildings, promote available grant schemes and facilitate engagement with owners in the maintenance of these buildings.
- Consider the protection of vernacular settlements by means of Architectural Conservation Area designation, promote the reuse of disused or unoccupied buildings within them, and ensure that developments proposed within or adjacent to vernacular settlements respect and enhance their spatial character, building forms, features, details and materials.

Cultural landscapes

The Department indicates that County Sligo boasts a significant number of historic designed landscapes. Gardens, public parks or landscapes associated with country estates may be included among these historic places. They are significant in terms of social history, biodiversity and mitigation of the effects of climate change. When open to the public, these places “offer tremendous opportunities in terms of mental and physical health and wellbeing through being in close contact with nature”.

The Department recommends Cork County Council's *Guidance Notes for the Appraisal of Historic Gardens, Demesnes, Estates and their Settings*, which can help in assessing the potential impact of development proposals upon designed landscapes.

Among the recommended policies and objectives, the following are the most relevant:

- Identify significant historic designed landscapes, demesnes and gardens for protection under the development plan.
- Identify and protect significant views to or from such places.
- Encourage and facilitate the retention and careful maintenance of these places and the various components set out in the introduction above, while preserving and protecting their biodiversity.
- Promote conservation, renewal and improvement that enhances the character and setting of historic designed landscapes, demesnes and gardens and of former examples of such places.
- Require a detailed appraisal of the potential impacts of any development proposed within or adjacent to these places, or that might affect their setting. A methodology for preparing such an appraisal can be found in the *Guidance Notes for the Appraisals of Historic Gardens, Demesnes, Estates and their Settings* (Cork County Council, 2005).

Chief Executive's opinion

Chapter 7.3 of the current Sligo CDP 2017-2023 contains the County Council's policies and objectives relating to Architectural Heritage. Many of the policies, objectives or measures recommended by the Minister are already included in the CDP.

All the narratives, policies, objectives and development management standards will be revised and updated to ensure consistency with the most recent national policy documents, specifically the National Policy on Architecture, Heritage Ireland 2030 and the Built Vernacular Strategy.

The recommendations relating to cultural landscapes are noted and agreed.

Some of the Minister's recommendations are of an operational nature and do not require CDP policies or objectives. They should, however, be applied when preparing the Draft Plan (e.g. compiling heritage data from the Historic Environment Viewer/mapper) or when implementing the next CDP (e.g. co-ordination of large infrastructural projects to the benefit of heritage sites).

The recommendation relating to the Local Authority Adaptation Strategy will be taken into account by the relevant County Council Department at the next review of this Strategy.

CE-2 – Chief Executive's recommendations on architecture and built heritage

The following additional provisions should be considered when drafting the CDP 2023-2029:

- A. Appropriate narrative, policies, objectives and development management standards relating to the resilience of built heritage confronted with the effects of climate change; measures to ensure the long-term survival of historic structures, significant heritage sites and traditional buildings, to ensure their appropriate energy-efficient upgrade and reuse;
- B. Specific policies for the protection of planned or designed historic landscapes/cultural landscapes (e.g. demesne landscapes), to ensure their long-term survival and positive evolution.

- C. A specific section on the built vernacular heritage, including suitable policies, objectives and development management standards.
- D. A substantially enhanced chapter dedicated to the regeneration of towns and villages, including a specific section on heritage-led revitalisation; this chapter should promote the Town Centre First approach (informed by the forthcoming ministerial guidelines)

2.2 Submission 57 – Northern and Western Regional Assembly (NWRA)

The introductory section of the Regional Assembly’s submission acknowledges the critical nature of the forthcoming development plan in shaping the future of the County and the wider sub-region by implementing the ambitions set for Sligo in the Regional Spatial and Economic Strategy (RSES).

Commending the Council for securing significant funding from the Urban Regeneration Development Fund (URDF) and Rural Regeneration Development Fund (RRDF), the NWRA notes the support given by central government to projects seeking the consolidation of the Regional Growth Centre as envisaged in the Regional Strategy.

The Regional Assembly indicates that the recently-published Draft Development Plan Guidelines (August 2021) provide timely directions in relation to Plan preparation and Core Strategy Development.

It is indicated that the Guidelines contain “a very comprehensive inventory of the necessary relevant staff to be involved in the wider Development Plan process team. The Assembly acknowledge that Sligo County Council, similar to a number of other Local Authorities in the Region are challenged in overall staff apportionment”.

The NWRA’s comments regarding key issues to be addressed in the Draft CDP 2023-2029 are grouped under four headings. The main recommendations are summarised below.

2.2.1 Sligo Regional Growth Centre

Sligo County Council is advised to integrate the main elements of the Sligo Regional Growth Centre Strategic Plan (RGCSP) into the County Development Plan 2023-2029.

- Within the Sligo RGCSP area, a number of significant landbanks, such as those lands at Oakfield, Ballytivnan / Rathbraughan, and Ballinode, have been identified as strategic economic/employment locations. Their phasing for development should be considered within the context of Section 4.4.4 of the Draft Guidelines.
- The Sligo RGCSP “sets out the ratio of jobs to population growth ambition of 1:2 as per the National Planning Framework, and this should be factored into the vision for delivery of all key strategic lands out to 2040”.
- The Local Transport Plan for Sligo Regional Growth Centre should be prepared in tandem with the Draft Plan, to inform land-use planning considerations, as advocated under RPO 6.27.
- The expansion of Sligo Town’s residential supply should be rolled out in a sequential / optimal manner where appropriate, inclusive of easy access to green infrastructure and public transport corridors.
- A Building Heights Study should be carried out for the Sligo Regional Growth Centre, as required by RPO 3.7.

Chief Executive’s opinion

The RSES uses the terms “Sligo Town” and “Sligo Regional Growth Centre” in an interchangeable manner in various chapters/sections, although there should be a clear distinction made between the two entities.

Sligo Town is the **principal urban area** of the Sligo Regional Growth Centre (RGC). The Sligo RGC Strategic Plan (Section 3.7 of the RSES) covers Sligo Town, its immediate Environs and the surrounding rural areas, which include a number of villages.

Recognising that Sligo has the vision and capacity to be a Regional Growth Centre of scale, the Strategic Plan contains twenty regional policy objectives (RPOs) grouped under three strategic goals identified as “Compact Growth”, “Enterprising Sligo” and “Liveable Sligo”.

The Strategic Plan indicates the means to achieve the goals and RPOs, highlights strategic growth areas, regeneration sites and infrastructure, and lists key projects to be delivered over the life of the RSES. The Sligo RGC Strategic Plan will inform the preparation of the Sligo and Environs Local Area Plan.

Appendix J of the current Sligo CDP 2017-2023 already includes the complete list of RPOs for Sligo Regional Growth Centre, as set out in the RSES. All these RPOs should be appropriately reflected in the policies and objectives of the Draft CDP 2023-2029.

CE-3 – Chief Executive’s recommendations on Sligo Regional Growth Centre

The following additional provisions should be considered when drafting the CDP 2023-2029:

- A.** The RSES RPOs relating to Sligo Regional Growth Centre Strategic Plan (RGC SP) shall be incorporated in the Draft CDP 2023-2029 through appropriate narrative, policies, objectives and, if necessary, development management standards.
- B.** A Local Transport Plan shall be prepared for the Sligo RGC SP area, in tandem with the Draft CDP 2023-2029, to facilitate the integration of land-use and transport in the Strategic Plan area. The preparation of the LTP shall be carried out in consultation with the NTA, to ensure that sustainable travel is appropriately supported.
- C.** The Draft CDP shall include provisions for phasing of development, based on the infrastructural assessment of lands which is being carried out by the Development Planning Unit in collaboration with the Roads Section of Sligo County Council and Irish Water.
- D.** An objective to undertake a Building Heights Study for Sligo Town shall be included in the Draft Plan.

2.2.2 Core Strategy

- The terminology associated with the designations in the Core Strategy’s Settlement Hierarchy and generally within the Draft Plan should be fully aligned with the NPF and RSES.
- The Draft CDP 2023-2029 plan should identify and prioritise a programme for the provision of serviced sites within smaller towns and villages, so as to be consistent with the provisions of RPO 3.7 of the RSES.
- The Housing Policy of the Draft CDP should include a mechanism for “nuanced targeting of reuse of derelict dwellings / farm buildings” (considered to be “brownfield sites), as required by RPO 3.3

Chief Executive’s opinion

The National Planning Framework, which replaced the NSS, did not retain the Gateway designation for Sligo, but recognised it as a Regional Centre and highlighted it as being a growth driver to a greater

extent than any other towns in the North-West. The RSES identifies Sligo Town as an “urban place of regional scale” and designates it a Regional Growth Centre. (As indicated under 2.2.1 above, the RSES uses the two terms in an interchangeable manner.)

The term “Gateway” has already been replaced by “Regional Growth Centre” as part of the Variation No. 1 of the CDP 2017-2023. The designation “Key Support Town”, assigned to Ballymote, Enniscrone and Tobercurry, should be replaced with “Support Town”, to avoid any confusion with the RSES designation “Key Town” (applying to eight towns outside County Sligo).

Regarding RPO 3.7, it is acknowledged that the provision of serviced sites in smaller settlements would help in the regeneration of local communities and would offer a better alternative to rural one-off housing.

Derelict dwellings in rural areas are currently the subject of specific policies (P-DHOU-1 and P-DHOU-2) which encourage their repair and reuse, also allowing for their extension or replacement. These policies will be reviewed and, if necessary, updated to take account of RPO 3.3.

CE-4 – Chief Executive’s recommendations on the Core Strategy

The following additional provisions should be considered when drafting the CDP 2023-2029:

- A. The Settlement Hierarchy of the Draft CDP 2023-2029 shall refer to Sligo Regional Growth Centre, with Sligo Town as its main urban area, and to the Support Towns of Ballymote, Enniscrone and Tobercurry.
- B. The Draft CDP shall include an objective to establish a programme for the provision of serviced sites within smaller settlements, consistent with the requirements of RPO 3.7
- C. In the Draft CDP 2023-2029, review and update the derelict housing policies, in light of RPO 3.3 and the recommendations of the DHLGH regarding the built vernacular.

2.2.3 Transport

- As part of a sustainable mobility policy, the cycling and walking trails specified in RPO 3.7.51 should be earmarked for continued expansion within the Sligo RGC SP.
- Land transport networks and investment priorities that have been identified in Chapter 6.3 of the RSES should also be included in the development plan for Sligo County – relating to international connectivity, road network, rail network, bus network, rural transport, walking and cycling and Local transport Plans.
- The advancement of Greenway projects including the SLNCR Intra-Regional Route connecting Sligo to Leitrim and beyond is a Sustainable Transport Scheme which can be significantly advanced during the lifetime of the 2023 – 2029 Plan and such schemes should be included as an objective of the plan (See Section 5.8 of the RSES).
- The advancement and prioritisation of the upgrade of the N-15 route from Sligo Town northwards to Leitrim / Donegal and its progression within the lifetime of the forthcoming Plan period should be clearly outlined. This project is listed within RPO 6.8 of the RSES and identified to assist the advancement and development of Sligo as an Urban Centre within the medium term.
- The importance of rail connectivity and capacity needs to be highlighted within the development plan in a manner consistent with the RSES and within the context of the ongoing national review.

Chief Executive's opinion

The RPO 3.7.51 provides for the continued expansion of cycleways and walking routes throughout the urban area and outwards to the satellite villages of Ballysadare, Strandhill and Rosses Point, linking into established and planned recreational trails such as Union Wood, Knocknarea etc. It is agreed that this RPO should be implemented in full and the routes should be extended further, where possible,

Section 6.3 Transport and Investment Priorities of the RSES contains 34 RPOs, some of which relate to specific projects in County Sligo. The majority are of a general, strategic nature.

The **Transport** chapter of existing CDP should be updated to include the necessary policies and objectives implementing all the RPOS which are relevant to County Sligo. The **Railways** section should also be updated in accordance with the most recent government publications.

The existing provisions regarding long-distance cycling and walking routes should be grouped under the heading "Greenways" and brought in line with the RSES and the recommendations of the National Transport Authority (Submission 16).

CE-5 – Chief Executive's recommendations on transport

The following additional provisions should be considered when drafting the CDP 2023-2029:

- A. The Draft CDP 2023-2029 shall include a specific objective (to be shown on an associated map) to expand the above-mentioned cycling/walking routes as per RPO 3.7.51.
- B. The **Transport** chapter of the Draft CDP 2023-2029 shall include appropriate policies and objectives implementing all the RPOs which are relevant to County Sligo.
- C. The updated **Railways** section of the Draft Plan shall be based on the best available information at the time of preparation.
- D. The Draft Plan shall include an expanded section dedicated to Greenways, accompanied by updated relevant policies and objectives.

2.2.4 Additional considerations

- "The RSES includes reference (RPO 5.3) to the ambition to consider the zone of (i) North Sligo / North Leitrim (Benbulbin and its hinterland) and (ii) Lough Arrow / Lough Key as a potential National Park / National Recreation area. Collaboration to realising this goal will be crucial and it would be important that the Draft Sligo County Development Plan reflects this within the Planning Policy Framework. The creation of such Zones / amenity areas should share the ethos of the RSES, wherein it is advocated adverse impacts upon local communities, archaeology, built heritage, landscapes and habitats are minimised while at the same time ensuring social, environmental and economic benefits accruing to local economies are maximised. The Draft Plan should reflect the regional ambition embodied within this Objective."
- "The RSES via RPO 5.2 encourages co-operation between Local Authorities in determining Landscape Character along County boundaries. The preparation of a new Landscape Character Assessment (LCA) for County Sligo may be worthy of consideration as it is noted that the current LCA for County Sligo appears to have been completed in 1996 - thus it is likely to benefit from review. Consideration could be given to undertake an LCA within a specified period following publication of the Draft Plan if it is not feasible to complete at this stage in the process."

- “To achieve the shared vision for the region the RSES recognises the need to strengthen our digital network and enable new technologies to work by ensuring that policies and systems are in place that can help people transition to a world much more digitally connected. RPOs 6.36 - 6.60 are tailored to promote smart places. The reference to Smart initiatives (Sec.11) within the Issues Papers is welcome and they present the potential to influence other policy and programme instruments, including the County Sligo LECP when reviewed.”

“The plan should also consider how to support the following Regional Development Objectives:

- a. RPO 6.4 Smart Ports
- b. RPO 7.1- 7.6 Education/Skills- including support for Technological University.
- c. RPO 7.8 Slainte Care.
- d. RPO 7.11 Healthy Ireland.
- e. RPO 7.14 Specific designation of lands for nursing homes and sheltered housing.
- f. RPO 8.2 Support Electricity Transmission Projects in Sligo (North West Project).
- g. RPO 8.5 and 8.6 Gas Networks and Natural Gas.
- h. RPO 8.8 Support for implementation of CURWMP.
- i. RPO 8.15 and 8.17 Water Infrastructure projects.”

Chief Executive’s opinion

It should be noted that most of the above-listed RPOs are high-level, aspirational, outside the scope of the County Development Plan (e.g. the designation of areas as “National Parks”, Slainte Care etc.) or very specific (such as zoning lands for nursing homes and sheltered housing).

All RPOs relevant to County Sligo’s development plan will be appropriately incorporated into the Draft CDP 2023-2029. Other RPOs – such as those relating to education, skills, health or the transition to a digital world – will be better addressed in the forthcoming Sligo 2030/LECP strategic document.

However, the need to review and update the existing Landscape Character Assessment is acknowledged. If this cannot be achieved in parallel with the drafting of the new Plan, it should become an objective of the CDP 2023-2029.

CE-6 – Chief Executive’s recommendations on “Additional Considerations”

The following additional provisions should be considered when drafting the CDP 2023-2029:

- A. All RPOs relevant to County Sligo’s development plan shall be appropriately incorporated into the Draft CDP 2023-2029.
- B. The Draft CDP 2023-2029 shall include a specific objective to review and update the Landscape Character Assessment for County Sligo.

2.3 Submission 76 – Office of the Planning Regulator (OPR)

After a brief introduction, the OPR indicates that its submission sets out some broad areas for the Council to consider in formulating the draft development plan. The Office's recommendations, which are grouped under ten headings, are summarised below.

2.3.1 Consultation strategies

The OPR refers to its document entitled *Increasing Public Engagement in Local Authority Development Plans - A communications toolkit*, which draws on existing good practices already used by local authorities and offers practical suggestions.

Chief Executive's response

The recommended toolkit is noted and its suggestions will be utilised when planning the public consultation on the Draft Plan 2023-2029.

2.3.2 Core Strategy and Settlement Strategy

In relation to the contents of the Issues Paper, the Office notes and welcomes the following:

- inclusion of 2026 and 2031 county population targets as set out in the *Implementation Roadmap for the National Planning Framework* (2018);
- inclusion of reference to the *Housing Supply Target Methodology for Development Planning Guidelines* (2020) and its implications for the forthcoming development plan;
- inclusion of information on the Housing Need Demand Assessment (HNDA) and the recognition that the preparation of the Sligo County Development Plan and Housing Strategy 2023-2029 shall be based on the county's HNDA;
- intention of the Planning Authority to amend the existing designation "Key Support Town", which will become "Support Town" in the forthcoming development plan.

Several recommendations are made in relation to the above:

- The planning authority should ensure that the Core Strategy Table includes Housing Supply Target (HST) figures calculated for the actual development plan period (i.e. not solely for 2026 and 2031). On the basis of information currently available, the Office estimates that the HST for County Sligo is c. 4,150 over the plan period.
- The Core Strategy should demonstrate how the plan will increase housing development in sustainable locations through land activation measures and targeted funding to unlock strategic sites and make the town centre area more appealing.
- The Housing Strategy should include the HNDA dataset, guidance and assessment tool, published by the DHLGH in April 2020. All data, scenarios, assumptions and constraints should be fully and robustly justified.
- The Core Strategy table(s) should follow the guidance provided by the *Development Plans, Guidelines for Planning Authorities - Draft for Consultation* (August 2021).

The table should include information in respect of the area in the development plan already zoned for residential use or a mixture of residential and other uses and the potential housing yield from same for each settlement.

In respect of the residential zoned land requirements for the plan period, the table should include the density assumptions informing the requirements for zoned land (i.e. the calculation of housing yield).

Chief Executive's opinion

It is evident that housing supply targets for County Sligo need to be calculated for the effective development plan period, from 2023 to 2029. The OPR's estimated 4,150 units is noted and will be confirmed (or otherwise) through detailed calculations.

The Core Strategy will be prepared in accordance with the legislation, will include all the required elements and will be consistent with the Draft Development Plan Guidelines (2021).

CE-7 – Chief Executive's recommendations on the Core Strategy and Settlement Strategy

The following additional provisions should be considered when drafting the CDP 2023-2029:

- A. The Core Strategy shall comply with the requirements of Section 10(2A) of] the Planning and Development Act 2000 (as amended) and shall be consistent with the NPF and RSES.
- B. The CDP 2023-2029 shall not include any reference to "Sligo City". The main urban area of the County shall be referred to as Sligo Town.
- C. The Core Strategy Table(s) shall follow the guidance provided by the *Development Plans, Guidelines for Planning Authorities - Draft for Consultation* (August 2021).
- D. In respect of areas zoned for residential use, the table(s) shall include appropriate density assumptions in order to calculate housing yield.
- E. The Core Strategy shall include a section explicitly demonstrating how the Plan seeks to increase housing development in specific sustainable locations (e.g. through land activation measures, targeting strategic sites, enhancing the attractiveness of the urban environment etc.)
- F. The housing supply target (HST) figure shall be calculated for the actual development plan period, from 2023 to 2029.
- G. A Housing Need and Demand Assessment (HNDA) shall be carried out for the County, in accordance with DHLGH Guidance for the Preparation of a Housing Need and Demand Assessment (April 2021), to inform the Housing Strategy and the housing policies of the Draft Plan.

2.3.3 Regional Growth Centre

The OPR advises that the forthcoming development plan "refrains from referring to Sligo as a city in its Core Strategy and Settlement Strategy since this would be inconsistent with the status given to it in the NPF and RSES. As previously communicated to the authority, this is not to diminish in any way your ambition for Sligo and its importance as a regional driver of growth".

Noting the recognition given to the Regional Growth Centre Strategic Plan (RGCSP) in the Issues Paper and the significance of Regional Policy Objectives 3.7.38 and 3.7.39 (facilitating the provision of between 3,000 and 5,000 new residential units by 2040 and the compact growth target of 40%), the

Office “welcomes the intent to incorporate into the Core Strategy the main provisions of the RSES and the principal elements of the Sligo RGCSP, and to redraw the Plan boundary for Sligo Town in line with the provisions of the RSES”.

Chief Executive’s response

The replacement of term “Sligo City” has been addressed by the Chief Executive’s recommendation **CE-4.A**.

The incorporation in the Draft CDP of the main RSES provisions relating to Sligo Regional Growth Centre has been addressed by the Chief Executive’s recommendation **CE-3.A**.

2.3.4 Compact growth and residential zoning

The OPR welcomes the Council’s intention to incorporate all zoning in the next development plan, as well as the recognition in the Issues Paper of the need to comply with the requirements of the *Urban Development and Building Height Guidelines (2018)* and *Sustainable Urban Housing: Design Standards for New Apartments (2020)*.

The OPR considers that the delivery of housing targets for settlements in a compact and sequential form will be a significant challenge for the forthcoming development plan.

The Office refers the Planning Authority to the guidance provided in section 6.4.2 and Appendix A (section 1.3.6) in the *Development Plans, Guidelines for Planning Authorities - Draft for Consultation (August 2021)* on settlement consolidation sites, and to considerations for ‘Additional Provision’ of residential lands in section 4.4.3 of the same guidelines.

Chief Executive’s opinion

The guidance highlighted by the OPR, provided in Sections 4.4.3, 6.4.2 and Appendix A (Section 1.3.6) of the Draft Development Plan Guidelines, contains specific provisions for details to be included in the Core Strategy, in addition to the mandatory elements set out in the Planning and Development Act. These provisions are summarised below, for the information of the Elected Members, and are followed by the Chief Executive’s recommendations for the Draft Plan.

Additional provision of residential lands

In the *Draft Development Plan Guidelines for Planning Authorities (August 2021)*, **Section 4.4.3 Ensuring Sufficient Provision of Housing Lands/Sites** acknowledges that in certain settlements it may be necessary to zone more serviced land for residential (or mixed) uses than the precise requirement of the projected housing demand. This approach would allow a degree of choice and would avoid restricting the housing supply through inactivity on a particular landholding.

In applying the *Additional Provision (AP)* mechanism, a planning authority must take into consideration eight distinct requirements (listed on p. 55 of the Guidelines).

There is no automatic presumption of AP. The extent of AP must be justified in the Core Strategy and cannot exceed 25% of the required quantum of zoned land in any settlement for the six-year plan period.

AP must not comprise lands that are not serviced or serviceable during the plan’s life, but **any parts of Strategic and Sustainable Development Sites** which will be phased and built over a longer period than

the six-year development plan (such as large-scale urban regeneration areas etc.) may be included as Additional Provision lands.

[Note: “Long-Term Strategic and Sustainable Development Sites” / LT SSDS are defined in Section 4.4.4. of the Guidelines, on p. 56. The LT SSDSs must be identified in the Core Strategy.]

AP lands must be phased in a clear sequence of priority, to facilitate development management decisions and monitoring of progress towards delivering housing targets.

Settlement Consolidation Sites (SCS)

In the *Draft Development Plan Guidelines*, **Section 6.4.2 Settlement Consolidation Sites** relates to larger settlements, particularly those with a population greater than 10,000 people. The Draft Guidelines define these sites as follows:

- located within or adjoining town centres;
- having significant potential for housing, commercial development, employment, or a mix of such uses;
- be capable of triggering the regeneration of a wider built-up area.

The Settlement Consolidation Sites must be “sufficiently strategic in nature and scale” and “integrated into a wider regeneration plan or strategy for the relevant area of the settlement”.

The Guidelines indicate that these “strategically important sites” must be identified on a map and accompanying schedule, providing the site size (in hectares) and any estimated housing yield for each site.

The Planning Authority is expected to prioritise and monitor the development of the SCSs (as part of the monitoring of Plan implementation).

In **Appendix A** of the Guidelines, **Section 1.3.6 Settlement Consolidation Site Maps** highlights the new requirement to designate SCSs within each settlement with a population greater than 1,500 persons. This must be done in a spatially sequential manner, from the core outwards.

It is stated that “the Settlement Hierarchy maps will indicate the available zoned residential and mixed-use land with residential development potential in each settlement and will specifically designate and identify the centrally located, infill, ‘Settlement Consolidation Sites””.

In settlements with fewer than 20,000 residents, the SCSs should generally be within 1 km (straight line) from the centre, with flexibility allowed in case of intervening topography, water bodies, heritage features or archaeological zones.

CE-8 – Chief Executive’s recommendations on compact growth and residential zoning

The following additional provisions should be considered when drafting the CDP 2023-2029:

- A.** The Core Strategy shall clearly identify the lands in each settlement where the designations **Settlement Consolidation Site** (SCS) and **Long-Term Strategic and Sustainable Development Site** (LT SSDS) will apply.
- B.** These lands shall be shown on separate maps, which shall be in addition to the main County Core Strategy Map and the detailed settlement zoning maps. Each map shall be accompanied by a schedule providing the site size (in hectares) and the estimated housing yield for each site.

- C. The Core Strategy shall include a specific section on **Additional Provision** of zoned lands if it proven necessary to zone more lands than the precise housing requirement in certain settlements. Such section shall contain the full justification for the presence and extent of AP in the respective settlements, in accordance with the requirements of Section 4.4.3 of the Draft Development Plan Guidelines.

2.3.5 Economic development and employment

Having regard to County Sligo's location within the Atlantic Economic Corridor and Sligo Town's "city-region like functions", the forthcoming development plan should address the potential of the regeneration sites identified in the Sligo RGCSP in the RSES.

Commending the Planning Authority for the preparation of Sligo 2030 (the new LECP), which will inform the new development plan, the OPR recommends consultation with the TII and NTA "to ensure that employment locations and development opportunities consider any implications for the national road network (existing and proposed) and opportunities to promote more sustainable travel".

In respect of tourism and recreational projects such as greenways, the Council is advised to "ensure that appropriate due diligence is undertaken at an early stage regarding environmental assessments, in particular where such projects are located within or close to European Sites".

Chief Executive's opinion

Atlantic Economic Corridor (AEC)

Both the NPF and the RSES support the Atlantic Economic Corridor (AEC) initiative, which seeks to build on the growth potential of large urban centres in the West, including Sligo. The overarching objective of the AEC initiative is to maximise the infrastructure and enterprise assets along the western seaboard. The combined strength of the economic hubs, clusters and catchments of the should attract investment and support job creation.

In Section 3.7(c) of the RSES, dedicated to the Sligo RGC SP, the "regeneration sites" shown on Fig 40 (p. 112) are briefly described on pages 113-114 of the Regional Strategy. A distinction is made between strategic sites for employment, strategic sites for housing and regeneration sites.

With regard to employment, Fig. 40 identifies the "industry and technology sites at Finisklin (existing IDA Business Park), Oakfield (future IDA Business Park) and Ballytivnan/Rathbraughan. However, these sites are not precisely defined in spatial terms.

Relation between transport network and employment locations

As major transport infrastructure is critical to maximising the opportunities of the AEC, the Council must ensure that existing and future employment-generating activities will be supported by the road network without any negative impacts on safety and carrying capacity.

Greenways

Regarding the potential impact of tourism projects, including greenways, on the environment, the current Development Plan contains appropriate policies ensuring that adequate environmental assessments are undertaken before consent is granted.

CE-9 – Chief Executive’s recommendations on economic development and employment

The following additional provisions should be considered when drafting the CDP 2023-2029:

- A. The Draft CDP 2023-2029 shall review the location and extent of all lands identified as strategic sites or regeneration sites in the RSES, and clearly define their existing functions and potential role in supporting the AEC initiative.
- B. This (re)definition shall take into consideration the outcome of the infrastructural assessment of lands within the Sligo RGC SP area and the designation of lands as Settlement Consolidation Sites (SCS) and Long-Term Strategic and Sustainable Development Sites (LT SSDS) – refer to the Chief Executive’s recommendation CE-8.A above.
- C. When considering suitable locations for employment creation or consolidation, the Development Planning Unit shall have regard to the recommendations made in the TII’s submission (Submission 9), to ensure that any negative impact on the national roads is avoided or minimized.
- D. The Draft CDP 2023-2029 shall include all the policies of the current CDP which ensure compliance with European and national environmental legislation. Where considered necessary, such policies shall be updated or refined.

2.3.6 Transport and infrastructure

The Office commends the Planning Authority for commencing an assessment of infrastructure available (or planned) to serve existing zoned lands in larger settlements, in consultation with infrastructure providers. This will ensure that the forthcoming plan is consistent with NPOs 72a, 72b and 72c.

The Office also welcomes the intent to prepare a Local Transport Plan in consultation with the NTA and relevant stakeholders, which will inform the forthcoming development plan and subsequent Local Area Plan (LAP) for Sligo Town.

With regard to transport and sustainable mobility, the Council is advised to:

- include specific modal share targets in the development plan for Sligo Town with possible aggregate targets for the lower-tier settlements. **Targets for modal split** for the purpose of the Draft Plan should be considered in counsel with the objectives of the relevant transport agencies including the NTA and TII.
- ensure that the policies in the development plan are consistent with RPO 6.5 regarding the capacity and safety of the region’s land transport networks and the *Spatial Planning and National Road Guidelines for Planning Authorities* (2012).

With regard to water supply and wastewater disposal, the OPR “encourages the planning authority to work proactively with Irish Water to progress projects that deliver infrastructure for the county’s smaller settlements through Irish Water’s Small Towns and Villages Growth Programme”.

Chief Executive's opinion

Infrastructural assessment of lands

NPOs 72a, 72b and 72c require that planning authorities:

- apply a standardised approach to differentiate between “i) zoned land that is serviced and ii) zoned land that is serviceable within the life of the plan”
- “make a reasonable estimate of the full cost of delivery of the specified services and prepare a report, detailing the estimated cost at draft and final plan stages”
- do not zone lands that cannot be serviced within the lifetime of the plan.

The Development Planning Unit of Sligo County Council, in collaboration with the Roads Section and Irish Water, has commenced an assessment of all zoned lands in terms of service availability, both current and planned (or feasible) in the period to 2029. Thus, the Council will be able to make an informed decision regarding the future zoning of lands in each County settlement.

This infrastructural assessment will also feed into the Settlement Capacity Audit (SCA) required by the Draft Development Plan Guidelines (Section 4.5.2)

Local Transport Plan, sustainable mobility

It is indeed the intention of the Local Authority to prepare a Local Transport Plan (LTP) as required by RPO 6.27, and to incorporate any emerging policies and objectives into the Draft CDP 2023-2029 and future Local Area Plan for Sligo Town, as required by RPO 6.28. This shall be done in collaboration with the TII and NTA.

The preparation of the LTP has been addressed by the Chief Executive under **CE-3.B**.

National road network

RPO 6.5 specifies that “the capacity and safety of the region’s land transport network will be managed and enhanced to ensure their optimal use, thus giving effect to National Strategic Outcome No.2 and maintaining the strategic capacity and safety of the national roads network including planning for future capacity enhancements.

Current CDP policies relating to the national road network ensure that the safety and carrying capacity of such roads are protected in accordance with government guidelines (Spatial Planning and National Roads Guidelines)

The incorporation into the CDP of RPOs relevant to transport and sustainable mobility has also been addressed by the Chief Executive’s recommendations **CE-5.A–D**.

Co-operation with Irish Water

This is an operational matter, which does not require a policy or objective in the CDP. There is ongoing co-operation between Sligo County Council and Irish Water, through the Water Services Section and the Planning Section. The Planning Authority actively supports the delivery of water supply and wastewater treatment projects for smaller towns and villages. However, many such projects are constrained by Irish Water’s investment plan and budget.

CE-10 – Chief Executive’s recommendations on transport and infrastructure

The following additional provisions should be considered when drafting the CDP 2023-2029:

- A. Ensure that a clear distinction between Tier 1 lands (that are serviced) and Tier 2 lands (that are serviceable during the lifetime of the Plan), based on the evidence provided by the infrastructural assessment.
- B. Ensure that lands that cannot be serviced during the lifetime of the CDP 2023-2029 are not zoned for development as part of this Plan.
- C. Any targets for modal split emerging from the Local Transport Plan shall be incorporated as objectives of the CDP 2023-2029 and included in the future LAP for Sligo Town.
- D. Ensure that the Draft CDP 2023-2029 includes appropriate, up-to-date policies protecting the safety and carrying capacity of such roads, in accordance with the Spatial Planning and National Roads Guidelines and any other recent relevant policy of the government.
- E. Continue to work with Irish Water to deliver adequate drinking water and wastewater treatment infrastructure in the County’s settlements through Irish Water’s Small Towns and Villages Growth Programme.

2.3.7 Rural development

The Council’s intention to include in the next development plan an enhanced chapter dedicated to town and village regeneration is welcomed by the OPR, which commends the Council for the RRDF funding secured so far.

The Office considers that such initiatives, together with providing serviced sites and directing at least 20% of all new housing in rural areas to brownfield sites, are critical in terms of demonstrating consistency with NPOs 18 (a & b) and RPOs 3.3 and 3.7.

In respect of rural housing policy, the Office advises the Planning Authority:

- to adopt an approach which defines rural areas under urban influence within the commuter catchment of Sligo Town and rural areas elsewhere and to include policies for each consistent with NPO 19;
- to project the need for single housing in the countryside through the HNDA, considering the current supply of vacant houses.

It is suggested that “the preparation of the rural area typologies map needs to consider improvements to the national road network such as the N4 / Collooney to Castlebaldwin Road Scheme, which have the potential to encourage commuting to Sligo Town from a wider catchment”.

Chief Executive’s opinion

Serviced sites

NPO 18 supports the regeneration of rural towns through interventions in the public realm, provision of amenities, acquisition of sites and provision of services.

RPO 3.3 requires that at least 20% of all new housing in rural areas must be delivered on brownfield sites.

RPO 3.7 highlights the Regional Assembly's support for local authorities "in identifying and prioritising a program for the provision of serviced sites within smaller towns and villages within 1 year of the adoption of the RSES. A rolling 2-year implementation plan shall subsequently be prepared.

The aforementioned programme for the provision of serviced sites needs to be based on the infrastructural assessment (currently underway) and the Settlement Capacity Audit that will support the Draft CDP 2023-2029.

After determining which are the most appropriate lands to be designated as Settlement Consolidation Sites (SCSs) in the County's towns and villages, it will be possible for the Local Authority to design and implement the serviced sites program with the support of the Regional Assembly, as specified in RPO 3.7

A recommendation regarding the provision of serviced sites has already been made by the Chief Executive under CE-4.B.

Rural housing policy areas

In respect of rural housing policy, it is noted that the currently designated *rural area under urban influence* (the same designation as recommended by NPO 19) is fully included within the commuter catchment of Sligo Town.

It is not considered necessary to amend the boundaries of this policy area on foot of the recent realignment of the N4. There is no evidence to suggest that the improved road would generate more (or longer-distance) commuter traffic, especially in a transition period when working from home has become a viable option for many holders of Sligo-based jobs.

The currently designated *rural areas in need of regeneration*, corresponding to "rural areas elsewhere", represent the remainder of the County area, outside the *rural area under urban influence*.

The opportunity of changing the name/designation (but not the boundaries) of *rural areas in need of regeneration* will be explored.

The HNDA which will be prepared in conjunction with the Draft CDP 2023-2029 will take into consideration existing information on residential vacancy when projecting the need for rural housing.

CE-11 – Chief Executive's recommendations on housing development in rural areas

The following additional provisions should be considered when drafting the CDP 2023-2029:

- A. The Draft CDP 2023-2029 shall retain the strategic housing policy SP-HOU-6 (adopted through the CDP Variation No. 1 in 2020), encouraging the delivery of at least 20% of new housing in rural areas on brownfield sites.
- B. The proposed chapter dedicated to town and village regeneration shall indicate the manner in which the Council intends to implement NPO 18 and shall contain appropriate policies and objectives in this regard.
- C. The text of existing rural housing policies for both types of rural areas shall be amended to comply with the full requirements of NPO 19, i.e. by adding the wording "having regard to the viability of smaller towns and rural settlements".

- D. It is noted that the strategic settlement policy SP-S-4, amended through the CDP Variation No. 1 in 2020, has already introduced the requirements of NPO 19 into the CDP. This strategic policy shall be retained in the Draft CDP 2029-2023.
- E. The existing data on residential vacancy shall be considered in the HNDA when projecting the need/demand for rural housing.

2.3.8 Flood risk management

The Office advises against the use of information from the Office of Public Work's (OPW) Preliminary Flood Risk Assessment (PFRA) and arterial drainage benefitting land maps to inform the Strategic Flood Risk Assessment. "The planning authority will need to take account of OPW Flood Relief Schemes and undertake adequate flood risk assessment to determine if there is sufficient information to inform zoning decisions or if further more detailed analysis is required".

The Council is advised as follows:

- To carry out plan-making justification tests as per Section 4.23 of the *Planning System and Flood Risk Management Guidelines* (2009). These tests are also applicable to existing developed areas located in Flood Zones A and B.
- To overlay the flood risk information on land use zoning maps in the forthcoming development plan.

Chief Executive's opinion

The OPR's advice regarding the utilisation of OPW flood-related information is noted.

Section 4.23 **Development Plan Justification Test** (*Planning System and Floor Risk Management Guidelines*, 2009) relates to situations "where a planning authority will need to consider the future development of areas at a high or moderate risk of flooding, for uses or development vulnerable to flooding that would generally be inappropriate".

When considering the future development of such areas in an urban settlement that are at moderate or high risk of flooding, for uses or development vulnerable to flooding, planning authorities are required to carry out the Justification Test detailed in Box 4.1 on p. 37 of the Guidelines.

In brief, lands proposed for zoning cannot pass the Justification Test unless the settlement is targeted for growth under the National / Regional Planning Strategy / County Development Plan / Local Area Plan, they are essential for regeneration, town core expansion or compact growth, and there is no suitable alternative.

The Strategic Flood Risk Assessment supporting the Draft CDP 2023-2029 will need to carefully apply the Justification Test for Development Plans to lands proposed to be zoned in the County's settlements which are designated for growth under the NPF/RSES (Sligo Town) or under the CDP itself (e.g. the Support Towns of Ballymote, Enniscrone and Tobercurry).

CE-12 – Chief Executive's recommendations on flood risk management

The following additional provisions should be considered when drafting the CDP 2023-2029:

- A. When considering the future development of lands at risk of flooding (moderate or high) in urban areas designated for growth in the NPF/RSES or in the Core Strategy of the Draft CDP 2023-2029,

Justification Tests shall be carried out prior to making any zoning decisions, as required by Section 4.23 of the *Planning System and Floor Risk Management Guidelines* (2009).

- B. The same Justification Tests shall be applied to existing developed areas located in flood zones A (where the probability of flooding from rivers and the sea is greater than 1% or 1 in 100 for river flooding or 0.5% or 1 in 200 for coastal flooding) or B (where the probability of flooding from rivers and the sea is between 0.1% or 1 in 1000 and 1% or 1 in 100 for river flooding and between 0.1% or 1 in 1000 year and 0.5% or 1 in 200 for coastal flooding).
- C. In the interest of clarity, the Draft CDP 2023-2029 shall include a set of maps showing flood zones A and B overlaid on land use zoning, in the case of settlements at risk from flooding.

2.3.9 Climate action and energy

The OPR notes that the County's transition to a low carbon economy and the overall reduction in carbon emissions "will become a central issue" in the preparation of the new plan, having regard to the Climate Action Plan 2019 and to the relevant objectives of the NPF and RSES.

After acknowledging the recognition given to climate action in the Issues Paper, the OPR lists the planning documents promoting renewable energy:

- Wind Energy Development Guidelines (2006),
- Circular Letter PL 5/2017: Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change;
- Wind Energy Development Guidelines 2006 – Update on Review (July 2017), or any replacement guidelines issued by the Minister.

In particular, the Office draws the Council's attention to the SPPR included in the *Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change* (2017).

"This requires, inter alia, that the Planning Authority indicate how the implementation of its development plan over its effective period will contribute to realising overall national targets on renewable energy and climate change mitigation, and in particular wind energy production and the potential wind energy resource (in megawatts). The plan must also clearly demonstrate that these targets can be met over the plan period having regard to the policies and objectives of the plan and supporting the Renewable Energy Strategy".

Chief Executive's opinion

The SPPR contained in the *Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change* (2017) reads as follows:

4. Specific Planning Policy Requirement

It is a specific planning policy requirement under Section 28(1C) of the Act that, in making, reviewing, varying or amending a development plan, or a local area plan, with policies or objectives that relate to wind energy developments, the relevant planning authority shall carry out the following:

- (1) Ensure that overall national policy on renewable energy as contained in documents such as the Government's 'White Paper on Energy Policy - Ireland's Transition to a Low Carbon Future', as well as the 'National Renewable Energy Action Plan', the 'Strategy for Renewable Energy' and the 'National Mitigation Plan', is acknowledged and documented in the relevant development plan or local area plan;

- (2) Indicate how the implementation of the relevant development plan or local area plan over its effective period will contribute to realising overall national targets on renewable energy and climate change mitigation, and in particular wind energy production and the potential wind energy resource (in megawatts); and
- (3) Demonstrate detailed compliance with item number (2) above in any proposal by them to introduce or vary a mandatory setback distance or distances for wind turbines from specified land uses or classes of land use into their development plan or local area plan. Such a proposal shall be subject to environmental assessment requirements, for example under the SEA and Habitats Directives.

It shall also be a material consideration in SEA, when taking into account likely significant effects on climatic factors, in addition to other factors such as landscape and air, if a mandatory setback or variation to a mandatory setback proposed by a planning authority in a development plan or local area plan would create a significant limitation or constraint on renewable energy projects, including wind turbines, within the administrative area of the plan.

In order to comply with the above SPPR, the Draft CDP 2023-2029 will need to ensure that any proposed policies relating to renewable energy and climate change are in compliance with the most up-to-date Government plans, strategies and legislation in these fields.

It will be necessary to estimate the County's share of the national renewable energy target (measured in MW) that should be delivered during the lifetime of the development plan.

It will also be necessary to indicate the manner in which the implementation of the Sligo County Development Plan will contribute to realising national targets for renewable energy.

The SPPR makes it clear that mandatory distances between wind turbines and specified land uses cannot be set in the Draft CDP if such distances would significantly limit or constrain renewable energy projects.

The preparation of a Renewable Energy Strategy for County Sligo should facilitate compliance with the SPPR. If such RES cannot be prepared in parallel with the Draft Plan, an objective should be included, requiring its preparation during the life of the Plan.

CE-13 – Chief Executive's recommendations on climate action and energy

The following additional provisions should be considered when drafting the CDP 2023-2029:

- A. When preparing the Draft CDP 2023-2029, ensure that any proposed policies relating to renewable energy and climate change are in compliance with the most up-to-date Government plans, strategies and legislation in these fields.
- B. The relevant chapter or section in the Draft CDP shall include an estimation of County Sligo's share of the national renewable energy target (measured in MW) that should be delivered during the lifetime of the development plan.
- C. The relevant chapter or section in the Draft CDP shall indicate the manner in which the Plan's implementation will contribute to realising national targets for renewable energy, demonstrating that the County targets can be met over the Plan period.
- D. The Draft Plan shall include an objective to prepare a Renewable Energy Strategy for County Sligo during the life of the development plan.

2.3.10 Other matters

The OPR highlights a number of recurring issues that have arisen in its evaluation of recent draft plans, as follows:

- The need for specialised housing (including Traveller accommodation) must be determined through HNDA. The Draft Plan “must provide implementable objectives for the provision of accommodation for Travellers consistent with the estimated need, and the land use zoning maps must indicate the location of lands to provide for such accommodation”.
- The Draft Plan should identify or map the location of major mineral deposits, as advised by the *Quarries and Ancillary Activities Guidelines for Planning Authorities* (DEHLG, 2004).
- Implementation and monitoring provisions should be clearly set out in the Draft Plan and should focus on “key outcomes, such the Core Strategy (e.g. population growth and housing delivery), urban and rural regeneration (including rural brownfield development and rural housing), the sustainable transport strategy (e.g. modal share, preparation of Local Transport Plan), climate action (e.g. renewable energy output), biodiversity and landscape (e.g. status of designated habitats)”.

Chief Executive’s opinion

The additional issues highlighted by the OPR are noted and the recommendations are accepted.

While it would be desirable to monitor renewable energy output or the status of designated habitats, the County Council may not have the means to carry out such monitoring other than through consultation of CSO-collected information and Government-commissioned research reports. Such information and reports may not be available at the right time to provide a baseline at Plan adoption stage and every two years thereafter, as emphasised in the Draft Development Plan Guidelines (2021).

It is noted that the monitoring of significant environmental effect of the implementation of the Plan is a statutory requirement of the SEA Directive. This requirement shall be complied with as part of the SEA associated with the Plan.

CE-14 – Chief Executive’s recommendations on “Other matters”

The following additional provisions should be considered when drafting the CDP 2023-2029:

- A. The HNDA associated with the Draft CDP 2023-2029 shall quantify the need for Traveller accommodation. The Draft Plan shall include specific objectives in this regard.
- B. The location of lands designated for Traveller accommodation shall be indicated on the relevant zoning maps.
- C. In respect of major mineral deposits, Section 3.4.4. of the SEA which accompanies the current CDP 2017-2023 indicates that the principal operational quarries within the County are located in the Ballysadare area, Lough Gill catchment area and near Geevagh. The locations of the first two are currently shown on the relevant zoning maps. The zoning objectives relating to mineral extraction shall be carried over into the next development plan.
- D. The Implementation section of the CDP 2023-2029 shall include a subsection detailing annual monitoring provisions focusing on key outcomes derived primarily from the Core Strategy (e.g. indicators relating to urban and rural housing permissions and completions, quantum of developed and occupied commercial floorspace, planning permissions for employment uses,

progress of the identified Settlement Consolidation Sites). This would be in accordance with Section 103 Plan Monitoring of the Draft Development Plan Guidelines (2021).

OPR's Summary

In the **Summary** provided at the end of the submissions, the OPR repeats its recommendations and includes several additional ones:

- Identify **key indicator / metrics** related to the implementation and delivery of the Core Strategy and key plan objectives, such as **measures that encourage infill/brownfield development** in the county's towns and the building of homes within the footprint of rural settlements.
- Include **targets for modal shift over the plan period** aligned to specific implementation and monitoring measures.
- Provide an **evidence-based policy framework to meet the need for renewable energy** in accordance with the Climate Action Plan 2019 and the relevant Section 28 guidelines.

Chief Executive's response

The OPR's summary is noted. The Office's recommendations will be complied with in the preparation of the Draft CDP 2023-2029.

Section 3

Submissions received from Prescribed Authorities

Prescribed authorities under Sections 11, 12 and 13 of the Planning and Development Act (the sections dealing with the county development plan), usually referred to as “prescribed bodies”, are those listed in Article 13 of the Planning and Development Regulations.

From a total of 29 prescribed bodies notified of the pre-draft consultation on the Sligo CDP 2023-2029, only 17 have returned comments and recommendations.

The issues outlined in submissions made by the DHLGH, the NWRA and the OPR have already been addressed in Section 2 of this report.

Section 3 (this section) summarises the issues raised in the other 14 submissions received from prescribed bodies. Where specific policy recommendations were received, these are quoted in full.

In response to the issues outlined in each submission, the Chief Executive has provided his opinion and, where necessary, his recommendations relating to the preparation and content of the Draft CDP 2023-2029.

The Chief Executive’s response is provided in purple type after each summary of issues.

3.1 Submission 1 – Office of Public Works (OPW)

The OPW is the lead agency for flood risk management in Ireland. The Office’s submission offers general guidance for flood risk management, highlights specific issues for consideration and includes additional information which will be useful in the process of preparing the Draft Plan and associated Strategic Flood Risk Assessment.

The OPW’s main recommendations are summarised below.

Flood risk management

- The Draft CDP 2023-2029 should include appropriate reference to the Guidelines on the Planning System and Flood Risk Management (DHPLG/OPW, 2009) issued under Section 28 of the Planning Acts, and associated Circulars and Technical Appendices.
- The implementation of Flood Risk Management Plans (FRMPs) and flood maps (prepared under the CFRAM Programme) is an objective of the RSES. The CFRAM Programme included analysis of flood risk in Ballymote, Ballysadare & Environs, Collooney, Coolaney, Gorteen, Riverstown, Sligo Town & Environs and Charlestown & Environs (Incl Bellaghy). Sligo County Council adopted FRMPs relevant to its administrative area.
- The zoning and development proposals contained in the Draft CDP 2023-2029 should not impede the progression of flood relief schemes (e.g. Rathbraughan) – a specific objective to be included in the Plan.
- The Draft CDP 2023-2029 should ensure the protection and maintenance of flood relief schemes implemented by Sligo County Council.

- When zoning land, preserve access for the maintenance of Arterial Drainage Schemes and Drainage Districts.
- Require site-specific FRA for development proposals on “benefiting lands”, because these may be prone to flooding.
- Require site-specific FRA where development proposals might increase flood risk up- or down-stream, due to increased runoff from additional drainage or increased paved areas or due to loss of storage.
- The Draft Plan should include a register of key flood risk infrastructure to avoid interference or removal of such infrastructure.
- The Draft Plan should encourage new (and existing) developments to consider natural water retention measures to reduce runoff and provide other benefits such as to water quality, biodiversity, etc. This can take the form of Sustainable Urban Drainage Systems (SUDS).

Consideration of climate change impacts

The Draft Plan should ensure that development does not occur in areas potentially prone to flooding in the future by providing space for future flood defences, specifying minimum floor levels and setting specific development management objectives.

Coastal change

The Draft CDP should take a precautionary approach to development in areas that may be at risk or vulnerable to coastal erosion or coastal change, including change associated with climate change (e.g. sea level rise, increased storm frequency, accelerated rates of coastal erosion, etc.).

Chief Executive’s opinion

Section 10.7 of the current Sligo CDP 2017-2023 contains essential information on flood risk management, together with the County Council’s policies and objectives in this regard. Section 10.4 addresses coastal protection and Section 10.6 contains climate change adaptation and mitigation provisions.

Most of the measures recommended by the OPW are already included in the CDP or are of an operational nature, not requiring specific policies in the Plan.

The Chief Executive has already made specific recommendations in relation to flood risk management under CE-12.A–C.

All the narratives, policies, objectives and development management standards will be revised and updated to ensure consistency with the relevant Flood Risk Management Plans.

CE-15 – Chief Executive’s recommendations on flood risk management

The following additional provisions should be considered when drafting the CDP 2023-2029:

- A. The preparation of the Draft CDP 2023-2029 and associated Strategic Flood Risk Assessment should be informed by the *Planning System and Flood Risk Management Guidelines* (2009), the Flood Risk Management Plans and flood maps relevant to County Sligo.

3.2 Submission 2 – Environmental Protection Agency (EPA)

The EPA is one of the statutory environmental authorities under the SEA Regulations. In its role as an SEA environmental authority, the Agency focuses on promoting the integration of the findings of the Environmental Assessment into the Development Plan. It also advocates that the key environmental challenges for Ireland are addressed as relevant and appropriate to the Plan.

The EPA's main recommendations are summarised below. The policy recommendations are extracted from the document *SEA of Local Authority Land-Use Plans - EPA Recommendations and Resources, 2021 Version 1.13* (included in the Agency's submission).

SEA Scoping considerations

The following key environmental considerations should be taken into account when preparing the Plan:

- Community engagement (including the SEA and developing alternatives)
- Sustainable development goals (SDGs of the UN Agenda 2030)
- Critical service infrastructure – should be in place, or required to be put in place to service any development proposed and authorised during the lifetime of the Plan
- Integration of transport and land-use planning – supporting compact growth
- Biodiversity – commitment to protect designated habitats, protected species and associated ecological corridors
- Climate action – alignment with national commitments on climate change mitigation and adaptation, incorporation of recommendations from sectoral, regional and local climate adaptation plans
- Key plans and programmes (the EPA lists the most relevant documents)
- Available guidance and resources from the EPA website

Drinking water

The Draft Plan should include:

- a policy promoting the conservation of water resources and also the need for detection and mitigation of infrastructural leakages.
- A policy to provide and maintain adequate and appropriate wastewater treatment infrastructure to service zoned lands and developments over the lifetime of the Plan.
- A commitment to address the issues arising in built-up areas with no treatment or poorly performing treatment plants, in collaboration with Irish Water.

Protection of surface and groundwater resources

The Draft Plan should include:

- A clear commitment to protect surface water, groundwater and coastal/estuarine resources and their associated habitats and species, including fisheries within and adjacent to the Plan area.
- Specific relevant objectives and measures for individual water bodies within the Plan area, as set out in the existing relevant Water Framework Directive River Basin Management Plan.

- A clear policy for the protection of groundwater resources and associated habitats and species.
- A commitment to integrate any existing Groundwater Protection Schemes and Groundwater Source Protection Zones, as relevant and appropriate within the Plan area.

Protection and management of bathing waters

The Plan should provide for the protection of any waters which are used for bathing within or adjacent to the Plan area.

Water Framework Directive and biodiversity

Any sites of significant biodiversity value within or adjacent to the Plan area, listed on the Water Framework Directive Register of Protected Areas (such as Fresh Water Pearl Mussel Catchments, designated Salmonid waters, fisheries / shellfisheries), should be protected in preparing the Plan.

Flooding

- The Plan should include a commitment to carry out strategic flood risk assessments, in line with the Flood Risk Management Guidelines, to inform the CDP and LAPs.
- A specific policy should require flood risk assessments to be undertaken where development is being proposed in areas with significant risk of flooding.
- The Plan should promote adaptation measures to account for the likely increased risk of flooding due to climate change, including Sustainable Urban Drainage Systems.
- The Plan should provide for protection, management and enhancement of existing wetland habitats where flood protection/management measures are necessary.

Climate change

- The Plan should be consistent with the National Policy Position on Climate Action and Low Carbon Development, the National Climate Action Plan (2019) and the National Adaptation Framework, as well as relevant sectoral, regional and local adaptation plans.
- The Plan should reflect the need to reduce greenhouse gas emissions and to protect, maintain and enhance carbon stocks.
- The Plan and associated SE should consider the degree to which climate change impacts, individually and in combination, are likely to influence the Plan's implementation. Aspects to be considered include the resilience of existing and proposed infrastructure to climate variability.
- To minimise any adverse impacts identified in the SEA, the Plan should include climate change adaptation measures that can be implemented either directly or through relevant land use plans and/or specific plans (e.g. Flood Risk Management Plans, Integrated Coastal Zone Management Plans etc.).

Air quality

The Plan should include a policy to promote the preservation of best ambient air quality and to avoid, prevent or reduce potential harmful effects on human health and the environment in general.

Noise

- Local Authority Noise Action Plans (NAPs) involve the identification of measures needed for the prevention and reduction of environmental noise.
- The Draft Plan should take into consideration any relevant noise maps and action plans.
- For larger urban areas, the Plan should protect and promote Quiet Areas identified as part of noise action planning.

Waste management

- The Plan should promote the integration of land use zoning and development to existing and planned availability of waste management infrastructure and capacity. This includes the redevelopment of brownfield sites and management of contaminated soil.
- The Plan should refer to and incorporate the relevant aspects of the Waste Action Plan for a Circular Economy (DECC, 2020).

Radon

Where significant concentrations of radon occur within the Plan area, these should be taken into account, as appropriate. Radon Maps are available at <https://www.epa.ie/environment-and-you/radon/radon-map/>

Biodiversity

- The Plan should include clear policies to conserve and protect all designated sites within, and in the vicinity of the Plan area (including the habitats and/or species for which they have been selected, or which they support), and should promote the protection of undesignated sites and local biodiversity features.
- The Plan should seek to protect and where possible improve wider aspects of biodiversity including ecological corridors / linkages / green infrastructure, areas of important local biodiversity,
- The CDP should provide buffer zones between developments and areas of significant biodiversity, and should ensure appropriate control and management measures for invasive species.
- The Plan should be supported by habitat mapping, including wetland mapping and other ecological surveys.

“Green” and “blue” infrastructure

Where the development of new greenways and blueways is considered, these should look to support rather than replace existing green infrastructure.

Energy

- The Plan should promote energy conservation measures to be incorporated into buildings. Relevant guidance in this regard, can be found on the website of the Sustainable Energy Authority of Ireland, www.seai.ie.

- There is "merit in including a commitment where relevant and appropriate", to use energy derived from renewable energy systems (e.g. solar, wind, bioenergy, geothermal etc.) and energy storage networks and systems within the Plan area.

Landscape

- The Plan should provide for the protection of designated scenic landscapes, scenic views, scenic routes and landscape features of national, regional, county and local value.
- Visual linkages between established landmarks and landscape features and views should be taken into account when land is being zoned and when individual development proposals are being assessed.

Human health and quality of life

The Plan should ensure provision of adequate infrastructure to serve both the existing community and future increases in population within the Plan area. A report that highlights the importance of access to good quality green and blue space can be consulted at:

<https://www.eea.europa.eu/publications/healthy-environment-healthy-lives>

Transport

- The Plan should promote sustainable modes of transport ('Smarter Travel – A Sustainable Transport Future – Transport Policy for Ireland 2009-2020' (DTTAS, 2009) should be referred to).
- The Plan should include and provide support for appropriate access to public transport, dedicated cycleways and pedestrian pathways, access to rapid charging infrastructure etc.
- The Plan should require the preparation or review of Integrated Traffic Management Plans for existing urban areas and proposed new urban developments, to address the short, medium and long-term traffic management requirements.

Chief Executive's opinion

The vast majority of the EPA-recommended policies are already incorporated in the current Sligo CDP 2017-2023. All relevant narratives, policies, objectives and development management standards will be revised and updated to ensure consistency with the most recent national policy documents.

The SEA associated with the Draft Plan will be carried out as required by European and national legislation and guidance.

All the EPA-provided information is noted and the recommendations are accepted.

CE-16 – Chief Executive's recommendations relating to the EPA submission

The following additional provisions should be considered when drafting the CDP 2023-2029:

- A. The preparation of the Draft CDP 2023-2029 and associated Environmental Report (Strategic Environmental Assessment) shall be carried out in accordance with European and national legislation governing SEA, taking into consideration the recommendations made by the EPA as part of pre-draft consultation.

3.3 Submission 3 – Department of Environment, Climate and Communications (DECC), Waste Policy and Resource Efficiency Division

The response received from the DECC following the statutory notification of Development Plan review contained a single recommendation: to consult directly with the Regional Waste Management Planning Office “regarding development of the final plans”.

Chief Executive’s response

The recommendation is noted and will be followed as part of the Draft Plan preparation.

3.4 Submission 4 – Department of Agriculture, Food and the Marine (DAFM), Fisheries Division

The submission received from the DAFM following the statutory notification of Development Plan review requested that the Draft Plan should evaluate the potential impact of development on commercial sea fishing activities, engaging in consultation with the fishing industry and other relevant stakeholders.

Chief Executive’s response

The request to “evaluate the potential impact of development on commercial sea fishing activities” is outside the scope of the Development Plan review and Draft CDP preparation.

No submissions have been received from any representatives of the fishing industry at pre-draft public consultation stage.

3.5 Submission 6 – Department of the Environment, Climate and Communications (DECC), Geological Survey Ireland

Geological Survey Ireland (GSI), the national earth science agency, has responded to the statutory notice of Development Plan review and to the Council’s SEA scoping request with a substantial amount of detailed information on geological heritage, groundwater, natural resources etc.

The submission encloses a table listing GSI’s publicly available datasets relevant to Planning, EIA and SEA. The main recommendations made by the GSI are summarised below.

Geology

- The Draft Plan should include a policy to protect from inappropriate development the County Geological Sites (CGSs) listed in a specific Schedule or Appendix.
- Geology/geological heritage should be considered as part of any tourism initiative that may be introduced, based on the (unpublished?) Geological Audit ([The Geological Heritage of Sligo \(dcca.gov.ie\)](http://The Geological Heritage of Sligo (dcca.gov.ie))) prepared as part of the County Sligo Heritage Plan 2002-2006.

- The GSI indicates that “Stone Built Ireland” is a two-year research collaboration between the GSI, Trinity College and the OPW. The project will document and promote awareness of local materials in restoration works (e.g. works to protected structures).

Groundwater

The GSI recommends the use of the groundwater maps on the Map Viewer ([Geological Survey Ireland Spatial Resources \(arcgis.com\)](#)) when assessing the potential impact of development on groundwater resources or specific groundwater abstractions.

Geohazards

Geohazards need to be taken into consideration, especially landslides, flooding and coastal erosion. Landslide information is available on the Map Viewer.

Geothermal energy

The GSI’s Geothermal Suitability Map ([Geological Survey Ireland Spatial Resources \(arcgis.com\)](#)) should be used when determining the most suitable type of ground source heat collector for use with heat pump technologies.

Natural resources (minerals/aggregates)

These material assets should be explicitly recognized as part of the SEA process. Active Quarries, Mineral Localities and Aggregate Potential maps are available on the Map Viewer.

Chief Executive’s opinion

The current Sligo CDP 2017-2023 includes a small section (7.1.3) on Geological Heritage Sites, an appendix (C) listing these sites and a separate section on mineral extraction and quarrying (4.3.4).

All relevant narratives, policies, objectives and development management standards will be revised and updated to ensure consistency with the most recent national policy documents.

The SEA associated with the Draft Plan will be carried out as required by European and national legislation and guidance.

All the GSI-provided information is noted and the recommendations are accepted.

CE-17 – Chief Executive’s recommendations relating to the GSI submission

The following additional provision should be considered when drafting the CDP 2023-2029:

- A. The preparation of the Draft CDP 2023-2029 and associated Environmental Report (Strategic Environmental Assessment) shall be carried out in accordance with European and national legislation governing SEA, taking into consideration the recommendations made by the GSI as part of pre-draft consultation.

3.6 Submission 7 – Department of Transport (DoT)

The Department of Transport indicates that “since the previous plan was published, there have been important policy developments which are relevant to accessible and integrated public transport”. The DoT considers that these should be reflected in the Transport and Mobility chapter of the Draft Plan, The main recommendations made by the DoT are summarised below.

Access for persons with disabilities

- The publication *National Disability Inclusion Strategy (NDIS) 2017-2022* includes specific actions assigned to local authorities, such as “dishing” of footpaths (action 108) and accessible infrastructure (action 109).
- There is an obligation to ensure access for persons with disabilities to the physical environment and transportation in urban and rural areas. This arises from Ireland’s ratification of the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD).
- The Draft Plan should refer to the 2020 *DMURS Interim Advice Note – Covid-19 Pandemic Response*, which includes guidance related to the principles of universal design.
- Public transport should be fully accessible to people with disabilities, with reference to all elements that constitute a journey from the starting point to destination. Local authorities must ensure a universal design approach to the built environment, including footpaths, cycle paths, roads, pedestrian crossing points, town greenways and bus stops/shelters.

Local Transport Plan

The National Transport Authority’s ‘Local Link Rural Transport Programme Strategic Plan 2018 to 2022’ has a key objective to co-ordinate with local authorities regarding the assessment of strategic transport needs and in the development of proposed transport plans for local areas.

Chief Executive’s opinion

The DoT’s recommendations with regard to universal design and the Local Authority’s obligation to ensure access for persons with disabilities are noted and accepted.

The Sustainable Mobility section of the Draft CDP 2023-2029 and any other relevant section should include appropriate reference to the principles of universal design and policies requiring full access for people with disabilities to public transport and the built environment.

The preparation of a Local Transport Plan in consultation with the National Transport Authority (NTA) has already been recommended by the Chief Executive under CE-3.B.

CE-18 – Chief Executive’s recommendations relating to universal design and access for persons with disabilities

The following additional provision should be considered when drafting the CDP 2023-2029:

- A. The Transport / Sustainable Mobility chapter of the Draft CDP 2023-2029 and any other relevant section shall include appropriate references to the principles of universal design and policies requiring full access for people with disabilities to public transport and the built environment.

3.7 Submission 9 – Transport Infrastructure Ireland (TII)

The submission received from the TII is extremely detailed with regard to the requirements of the NPF, RSES, National Development Plan and statutory guidance, particularly the Smarter Travel (DTTAS, 2009), Investing in our Transport Future (DTTAS, 2015) and the Spatial Planning and National Roads Guidelines for Planning Authorities (2012).

The main recommendations made by the TII are summarised below. Some of these include specific wording for policies to be included in the Draft Plan.

Managing investment in roads and statutory guidance

- The N4 Dublin to Sligo route, the N15 Sligo to Lifford route, the N16 Sligo to N.I. Border route and the N17 Sligo to Galway route, national primary roads, through Sligo are identified as part of the EU TEN-T Comprehensive Network. The N59 provides important regional and inter-regional connectivity. Such designations require specific policies and objectives the new County Development Plan.
- The Draft CDP should include the following strategic policies in the Core Strategy:
 - *to maintain the strategic function, capacity and safety of the national roads network, including planning for future capacity enhancements.*
 - *to ensure that the existing extensive transport networks, which have been greatly enhanced over the last two decades, are maintained to a high level to ensure quality levels of service, safety, accessibility and connectivity to transport users.*
- Where large-scale urban development is proposed on lands adjoining national roads, major junctions and interchanges, the Draft CDP should ensure that the road capacity is utilised appropriately by:
 - protecting undeveloped lands adjoining national roads and junctions from development to cater for potential capacity enhancements;
 - ensuring that capacity enhancements and or traffic management measures will be put in place to facilitate new development; and
 - improving operational efficiency of the regional and local road and transportation infrastructure – e.g., where appropriate, promoting new regional and local road networks and alternative modes.

Development and Core Strategy

- The implications of land use policies on the strategic national road network in the area should be a criterion in determining the future land use zoning strategy, to be outlined in the Core Strategy of the Draft Plan.
- The Local Transport Plan (LTP) for the Sligo Regional Growth Centre Area must inform the development plan, local area plans and any other planning framework document. The policies, objectives and detailed measures emerging from the LTP must be incorporated into the Sligo CDP 2023-2029 and in the subsequent Local Area Plan for Sligo and Environs. Consultation with TII and NTA is required.
- Review the extent and location of industry, employment and other commercial type land uses to prepare a co-ordinated and integrated land use pattern; the Guidance Note on Core Strategies published by the DoECLG (2010) contains advice on this requirement.

Development at national road junctions

- Give consideration to undertaking appropriate Area Based Transport Assessment (ABTA) and/or Strategic Transport Assessment (STA) to support the preparation of the Draft CDP, particularly in relation to areas of planned development which have an interface with the national road network. This is relevant for Sligo Town and higher-tier settlements in the County.

Section 1.4 of the NRA/TII Traffic and Transport Assessment Guidelines (2014) refers. TTAs are not a substitute for ABTA/STA and can lead to “a piecemeal and unsustainable approach to development”.

- In accordance with Section 2.7 of the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities, particular care must be exercised in the assessment and management of development proposals in the Development Plan relating to development objectives or the zoning of locations at or close to junctions on the national road network in accordance with the provisions of official policy.

- Recommendation for the Draft Plan to include a policy worded as follows:

‘It is a policy of the Council to protect the capacity and strategic function of the national road network and associated junctions, having regard to all relevant Government Guidance, including DoECLG Spatial Planning and National Roads Guidelines (DoECLG, 2012) in the carrying out of local authority functions’.

Access to national roads

- Recommendation for Draft Plan to include a policy (consistent with Section 2.5 of the DoECLG Spatial Planning and National Roads Guidelines) worded as follows:

‘To avoid 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 60kmph apply, in accordance with the requirements of the Section 28 Ministerial Guidelines ‘Spatial Planning and National Roads Guidelines for Planning Authorities’ (DoECLG 2012)’.

Exceptional circumstances

- Where the planning authority proposes to exercise a less restrictive approach to the control of development accessing national roads, this should be plan-led, done in consultation with and subject to the agreement of TII, in accordance with the provisions of Section 2.6 of the DoECLG Spatial Planning and National Roads Guidelines.
- The Council may also wish to consider cases relating to any planned strategic infrastructure development proposals.

Retail development

The Draft Plan should include a policy indicating the explicit presumption against large out-of-town retail centres located adjacent or close to existing, new or planned national roads/motorways, reflecting policy outlined in the Retail Planning Guidelines, 2012.

National roads

- The TII identifies the N4 Collooney to Castlebaldwin as a “scheme to be delivered” under the National Development Plan, and the N17 Knock to Collooney as a “scheme in planning/design/construction” in the NDP. The Draft CDP should include up-to-date information on national road schemes and improvement schemes.
- Specific policy to be included in the Draft Plan:
 - ‘To protect the study area, route corridor options and thereafter the preferred route corridor selected for the national road schemes being progressed in the Development Plan in accordance with National Development Plan Objectives and to prohibit development that could prejudice their future delivery’.*
- The Draft Plan should ensure that Appropriate Assessment of national road scheme planning is undertaken in accordance with the requirements of Article 6(3) and Article 6(4) of the Habitats Directive.
- The Draft CDP should include reference to Road Safety Audit (RSA) and Road Safety Impact Assessment (RSIA) requirements in relating to development proposals with implications for the national road network.
- The Draft Plan should include reference to the TII’s Traffic & Transport Assessment Guidelines (2014) relating to development proposals with implications for the national road network.

Thresholds advised in the TII’s Traffic & Transport Assessment Guidelines (2014), including sub-threshold TTA requirements, relate specifically to development proposals affecting national roads.
- As part of the Draft Plan preparation, consider the requirements of Section 2.8 of the DoECLG Spatial Planning and National Roads Guidelines and the TII Policy on Service Areas in relation to service area provision.
- Incorporate in the Draft Plan the main elements of TII’s Provision of Tourist & Leisure Signage on National Roads (March 2011). Note that Section 3.8 of the DoECLG’s Spatial Planning and National Roads Guidelines requires control of the proliferation of non-road traffic signage on and adjacent to national roads.
- Address and refer to the requirements of S.I. No. 140 of 2006 Environmental Noise Regulations in the Draft Plan. The Regulations require development proposals to identify and implement noise mitigation measures when introducing noise-sensitive uses in the environs of existing and planned national roads, where such mitigation is warranted. The costs of implementing mitigation measures shall be borne by the developer.
- Include the following policy:
 - ‘The capacity and efficiency of the national road network drainage regimes in County Sligo will be safeguarded for national road drainage purposes’.*
- Include the following provisions in relation to energy-generating developments:
 - grid connection routing options should be developed to safeguard the strategic function of the national road network by utilising alternative available routes;
 - applications for photovoltaic (PV) farm developments should be accompanied by glint and glare assessments.

Chief Executive's opinion

Section 8.1 of the current Sligo CDP 2017-2023 offers substantial information on national and regional transport policy and capital investment in transport infrastructure. Section 8.2.1 contains specific details on the national roads network, together with the County Council's policies and objectives in this regard.

Most of the recommendations of the TII, which are based on the Spatial Planning and National Roads Guidelines, are already included in the CDP. Other recommendations relate to the process of Plan preparation, not requiring specific policies in the Plan – e.g. the recommendation to review the extent and location of industry, employment and other commercial type land uses.

The preparation of a Local Transport Plan in consultation with the National Transport Authority (NTA) has already been recommended by the Chief Executive under CE-3.B.

All the narratives, policies, objectives and development management standards relating to the national roads network and its integration with land-use planning will be revised and updated to ensure consistency with the national and regional policy and guidance, as well as the investment priorities set out in the revised National Development Plan (October 2021).

CE-19 – Chief Executive's recommendations relating to the national roads network and its integration with land-use planning

The following additional provision should be considered when drafting the CDP 2023-2029:

- A. The Transport / Sustainable Mobility section of the CDP and any other relevant section shall be reviewed to take account of the most recent updates to national policy and investment framework, taking into consideration the recommendations made by the TII as part of pre-draft consultation.

3.8 Submission 17 – Inland Fisheries Ireland (IFI)

Inland Fisheries Ireland (IFI) is the state body responsible for the protection, management and conservation of the inland fisheries and sea angling resource in Ireland. Protection of the aquatic environment and habitat is a vitally important element of IFI's work.

The submission received from the IFI addresses the protection of aquatic habitats under ten headings. The main recommendations are summarised on the next page.

General recommendations

- In order to safeguard the high value of the fishery resource in the county, the protection of water quality and fisheries habitat should be factored into all relevant aspects of the CDP. **A policy in relation to aquatic habitat protection should be included in the new CDP.**
- The Draft CDP must address not only water quality but also include the protection of the physical environment, hydrological processes and biodiversity.
- The Development Plan should be consistent with River Basin Management Plans and comply with the requirements of the EU Water Framework Directive (WFD) (2000/60/EC).

Water quality and municipal wastewater treatment infrastructure

- Sufficient treatment capacity must be available both within the receiving sewerage systems locally and downstream of waste water treatment plants to ensure the protection of the ecological integrity of the ultimate receiving waters.
- In areas where adequate wastewater treatment facilities do not exist, planning permissions should either be refused on the grounds that such development is premature or granted with conditions specifying that connections to the sewer will not be permitted until sewage works upgrading is completed and operational.
- IFI does not support the installation of package treatment plants and has significant concerns regarding the long-term management and maintenance of privately operated communal proprietary effluent treatment systems serving a number of dwelling houses.

Water quality and integrated constructed wetlands (ICWs)

ICWs must satisfy the criteria detailed in the publication “Integrated Constructed Wetlands, Guidance Document for Farmyard Soiled Water and Domestic Wastewater Applications” (DoEHLG, 2010).

Protection of riparian habitats

- IFI requests a policy for the protection of aquatic and riparian habitat be included in the CDP.
- The section on Environmental Sustainability should include a section on freshwater aquatic habitat. All riparian areas should be zoned in a way that protects them from development pressures.
- The Draft CDP should include a policy which preserves riparian/buffer zones free from inappropriate development along banks of rivers and streams for the purposes of providing habitat, river maintenance, access for anglers, walkers, recreational area and pollution buffer zones, undertaking to maintain such corridors.
- The Draft CDP should provide for the protection of habitats outside designated areas. Development proposals should not interfere with natural floodplains.
- IFI should be consulted in relation to any development that could potentially impact on the aquatic ecosystems and associated riparian habitat.
- New urban development proposals should incorporate the *Planning for Watercourses in the Urban Environment* guidance (<https://www.fisheriesireland.ie/extranet/fisheries-management-1/1756-ifi-urban-watercourses-planning-guide-2020-update/file.html>) - this document “be incorporated” into the CDP.

Invasive species

The Development Plan should include policies to ensure that developments do not lead to the spread of invasive species.

River-crossing structures

- The Draft Plan should include a policy on the use of clear span structures (where possible) on fisheries waters and that IFI should be consulted on any such proposed developments.

- All construction works in or adjacent to watercourses should adhere to IFI's Guideline documents on road construction (attached to the submission) and Guidelines on protection of fisheries during construction work in and adjacent to waters (<http://www.fisheriesireland.ie/fisheries-and-construction-works>)

Water conservation

- The Draft Plan should promote awareness of water conservation and water use efficiency.
- Best practice should be promoted in respect of water conservation in all developments through methods such as rain water harvesting.

Sustainable Urban Drainage Systems (SUDS)

The CDP should require that new developments should include SUDS such as green roofs, swales and open surface water attenuation ponds instead of underground tanks.

Management policies

The Draft Plan should provide for the protection of the aquatic environment through the following mechanisms:

- River Corridor Management Areas (particularly within towns and cities).
- Special Preservation Orders provided for specific habitats in need of protection, e.g. an Aquatic Protection Order.
- Special Amenity Areas, identified for their potential as Linear Parklands along waterways.

Consideration of potential significant environmental impacts (AA, SEA)

In determining the likely significant environmental effects of the Plan, the following should be considered:

- Water quality
- Aquatic and associated riparian habitats
- Biological Diversity
- Ecosystem structure and functioning
- Fish spawning and nursery areas
- Surface water hydrology
- Passage of migratory fish
- Areas of natural heritage importance including geological heritage sites
- Sport and commercial fishing and angling
- Amenity and recreational areas

Chief Executive's opinion

Section 7.1.6 of the current Sligo CDP 2017-2023 contains the Plan's provisions relating to the protection of inland waters and associated habitats. The quality of all water bodies is addressed in Section 10.1. Surface water drainage policies are included in Section 9.4.

Most of the recommendations of the IFI are already incorporated in the CDP. Other recommendations relate to the development management process, not requiring specific policies in the Plan – e.g. the requirement to consult with IFI in relation to any development that could potentially impact on the aquatic ecosystems and associated riparian habitat.

All the narratives, policies, objectives and development management standards relating to the protection of water quality, riparian zones and aquatic habitats will be revised and updated as appropriate.

CE-20 – Chief Executive’s recommendations relating to the protection of water quality, riparian zones and aquatic habitats

The following additional provision should be considered when drafting the CDP 2023-2029:

- A. The Draft CDP 2023-2029 sections relating to the protection of water quality, riparian zones and aquatic habitats shall be prepared taking account of the *Planning for Watercourses in the Urban Environment* guidance document and considering the recommendations made by the IFI as part of pre-draft consultation.

3.9 Submission 34 – Arts Council / an Comhairle Ealaíon

The Arts Council / an Chomhairle Ealaíon is the Irish government agency for developing the arts, operating as an autonomous body under the aegis of the Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media.

The Arts Council is currently preparing its own ‘Spatial Policy’, which will set out a clear vision for how it endeavours to see the arts and culture more strongly integrated into spatial development frameworks and land-use planning policy.

After a long introduction, covering high-level topics like Arts Council’s strategy, emerging trends, the contributions of arts and culture toward proper planning, the applicable provisions of the Planning Act and RSES RPOs relevant to culture, the submission puts forward several recommendations for the Draft CDP 2023-2029. These are summarised below.

Value and function of Arts and Culture

- The Draft Plan should recognise the value and function of arts and culture “as an essential part of social infrastructure as well as contribution toward economic and tourism strategy”.
- The Plan should acknowledge the contribution of arts and culture to the revitalisation of towns and villages through the use of underutilised or vacant buildings as artist workspaces, creative hubs, exhibition spaces etc.
- The Draft CDP should support the provision of arts and culture in formal and informal spaces, in the built and natural environment such as parks and open spaces, where they can “make a significant contribution towards social, cultural and physical wellbeing to the community.

Arts and Culture Plans and Strategies

Ensure that the specific spatial objectives set out in the County Arts Plan are reflected in the new CDP.

Spatial framework

- The Draft CDP should adopt a policy “for the preservation, enhancement and provision of Arts and Culture which have been/are identified of value in contributing toward physical, social and economic benefit for the County”.
- The policies and objectives relating to arts and culture should be informed by “an evidence-based needs assessment in accordance with the recommended approach detailed in the Draft Development Plan Guidelines 2021”.
- A **County Register of arts and cultural assets** could be established, to include “infrastructure such as arts centres, museums, heritage buildings, artists’ workspaces or townscapes, or public spaces and locations which either individually or collectively, contribute to access to, and/or provision of arts and culture”. (This would provide the evidence base for determining the requirements for new cultural facilities, as recommended in the Draft Development Plan Guidelines 2021.)

Clarity in Development Plan policy

The Arts Council would welcome that any policies and objectives relating to the provision of arts and culture infrastructure in the Development Plan are clear, concise, practical, and implementable from a development management perspective.

Chief Executive’s opinion

Section 6.4 of the current Sligo CDP 2017-2023 contains the Plan’s policies relating to arts and cultural facilities. It is accepted that this section should be expanded to address the issues raised in the Arts Council’s submission and to incorporate the relevant provisions of the forthcoming Spatial Policy of the Arts Council.

All the narratives, policies, objectives and development management standards relating to the promotion of arts and culture, and to the provision of cultural infrastructure, will be revised and updated in accordance with Arts Council’s submission.

CE-21 – Chief Executive’s recommendations relating to Arts and Culture

The following additional provision should be considered when drafting the CDP 2023-2029:

- A. The Draft CDP 2023-2029 sections relating to the promotion of Arts and Culture, and to the provision of cultural infrastructure, shall be prepared taking account of the recommendations made by the Arts Council as part of pre-draft consultation.

3.10 Submission 39 – Irish Water (IW)

Irish Water is responsible for the provision of public water supply, wastewater collection and treatment services. It is an objective of Irish Water to provide both drinking water and wastewater capacity to support national, regional and local economic and spatial planning policy, subject to the constraints of the Irish Water Capital Investment Plan. Sligo County Council retains its role in facilitating the provision of adequate water services, in conjunction with Irish Water, at a local level, through Service Level Agreements (SLAs).

The introduction to IW's submission briefly refers to national and regional policy, Water Services Policy Statement (2018-2025), Water Services Strategic Plan (2015-2040), IW Strategic Funding Plan 2019-2024, the Capital Investment Plan 2020-2024 and the forthcoming National Water Resources Plan. A substantial amount of information is then provided in relation to Irish Water's current and planned projects for County Sligo.

The comments made by Irish Water in relation to the Draft Plan are grouped and summarised below. A separate document appended to the submission suggests specific policies for inclusion in the Draft County Development Plan.

Zoning

Irish Water is currently co-operating with Sligo County Council's Development Planning Unit in the process of identifying lands suitable for zoning from a water services perspective.

Water and wastewater infrastructure

- Localised network reinforcements (e.g. extensions) may be required to service certain lands. Where such works are required, "these shall be developer driven unless there are committed IW projects in place to progress such works".
- The Draft CDP should include policies and objectives requiring the use of Sustainable Urban Drainage Systems and "Green-Blue Infrastructure" in new developments and in existing developed areas (by way of retrofitting).
- Sligo has "ample capacity to accommodate growth". Details on the available capacity of wastewater treatment plants in the county will be included in the 2020 Wastewater Treatment Capacity Register, due to be circulated to local authorities when finalised.
- Further upgrades may also be progressed under Irish Water's Small Towns and Villages Growth Programme which is intended to provide growth capacity at wastewater treatment plants (and water treatment plants) in smaller settlements which would not otherwise be provided for in the current Investment Plan.
- A Drainage Area Plan for Sligo Town, due to commence in 2021, will involve a detailed assessment of the network, identification of constraints and interventions required to cater for current and future populations, and will take several years to complete.
- A Network Development Plan is also scheduled to be carried out for Sligo Town. This plan "will help inform how undeveloped zoned sites within the town could be serviced".

Suggested policies and objectives for inclusion in the Draft Plan

General Policies in relation to Water Services

- To work closely with Irish Water to identify and facilitate the timely delivery of the water services required to realize the development objectives of this plan;
- To consult with Irish Water in the development of Plans, SDZs, etc. in order to ensure the proposed spatial strategy takes account of:
 - the available capacity of the public water services infrastructure;
 - the need to protect and optimise existing and planned public water services infrastructure;
 - the need for sequential and phased development;
 - the financial and environmental implications of development in sensitive areas.
- Prior to granting planning permission the Council will ensure that adequate water services will be available to service development and that existing water services are not negatively impacted. The Council should require developers to provide evidence of consultation with Irish Water prior to applying for planning permission.
- To protect existing wayleaves and buffer zones around public water services infrastructure through appropriate zoning and to facilitate the provision of appropriate sites for required water services infrastructure as necessary;

Water Supply

- To protect both ground and surface water sources, to avoid water quality deterioration and reduce the level of treatment required in the production of drinking water, in accordance with Article 7(2) of the WFD. Protection and restoration of drinking water at the source can have co-benefits for biodiversity and climate change;
- To support Irish Water in the development and implementation of Drinking Water Safety Plans which seek to protect human health by identifying, assessing and managing risks to water quality and quantity; taking a holistic approach from source to tap.
- To support Irish Water in the development and implementation of the National Water Resources Plan for Ireland's public water supplies which seeks to address issues around the availability of water;
- To promote water conservation and demand management measures among all water users, and to support Irish Water in implementing water conservation measures such as leakage reduction and network improvements, including innovative solutions in specific situations.

Wastewater Services

- To ensure that the Local Authority provides adequate storm water infrastructure in order to accommodate the planned levels of growth within the plan area and to ensure that appropriate flood management measures are implemented to protect property and infrastructure;
- To require all new development to provide a separate foul and surface water drainage system and to incorporate sustainable urban drainage systems where appropriate in new development and the public realm;

- To prohibit the discharge of additional surface water to combined (foul and surface water) sewers in order to maximise the capacity of existing collection systems for foul water;
- To support Irish Water in the promotion of effective management of trade discharges to sewers in order to maximise the capacity of existing sewer networks and minimise detrimental impacts on sewage treatment works;
- To ensure that all new developments connect to the public wastewater infrastructure, where available, and to encourage existing developments that are in close proximity to a public sewer to connect to that sewer. These will be subject to a connection agreement with Irish Water;
- To refuse residential development that requires the provision of private waste water treatment facilities (i.e. Developer Provided Infrastructure), other than single house systems;
- The provision of single house septic tanks and treatment plants in the Plan area will be strongly discouraged to minimise the risk of groundwater pollution. Where such facilities are permitted, full compliance with the prevailing regulations and standards, including the EPA's Code of Practice for Domestic Waste Water Treatment Systems (PE. ≤10) (EPA 2021), as may be amended, will be required;
- To ensure that private wastewater treatment facilities, where permitted, are operated in compliance with their wastewater discharge license, in order to protect water quality.

Chief Executive's opinion

In Chapter 9 of the current Sligo CDP 2017-2023, Sections 9.1 and 9.2 contain essential information, policies and objectives relating to water supply and wastewater treatment. These sections already include most of the policies suggested by Irish Water, albeit with slightly different wording.

The requests for consultation and co-operation with IW in the development of spatial planning frameworks of all levels are noted and will be acted upon as necessary.

All the narratives, policies, objectives and development management standards relating to water supply, water resource conservation and wastewater treatment will be revised and updated in light of Irish Water's suggestions.

CE-22 – Chief Executive's recommendations relating to water supply and wastewater treatment infrastructure

The following additional provision should be considered when drafting the CDP 2023-2029:

- A. The Draft CDP 2023-2029 sections relating to water supply and wastewater treatment shall be prepared taking account of the updated information and suggestions made by Irish Water as part of pre-draft consultation.

3.11 Submission 42 – Department of Education (DoEd)

The Department of Education notes that “the population growth projected in the National Planning Framework combined with its focus on compact growth and sustainable development requires a collaborative engagement between this Department and planning authorities in order to support the provision of additional and enhanced education facilities in our communities.”

The Department’s observations are grouped and summarised below.

Existing school sites and possible expansion

The Draft CDP should include a policy supporting the provision of school accommodation, i.e. the development of new schools and the expansion or alteration of existing one, together with infrastructure and amenities supporting schools.

Zoning

- Request to protect “the zoning of the existing school sites” and to “maintain land buffers around them” in order to facilitate future expansion.
- The existing CF (community facilities) zoning objective, which supports education-related activities, should be retained in the new Plan.
- Zoned school sites should be supported by location-specific objectives in the Draft Plan and should be mapped on the Council’s GIS.
- The provisions of schools, either permanent or temporary, should be permissible by as many zoning objectives as possible.

Population growth in the Sligo RGC

Explicit provision for school development must be made within the existing built-up footprint of Sligo Town, on infill and brownfield sites, to serve the increase in population generated by residential densification.

Access and car parking

The Draft Plan should support “urban-design schools as per DES guidelines”, with reduced on-site parking and set-down provisions, but with better access to off-site public amenities such as open space, recreational areas and childcare facilities.

Infrastructural assessment

The capacity of exiting schools and any planned schools, as published by the Department, should be taken into consideration as part of the infrastructural assessment on which Draft CDP zoning will be based.

Chief Executive’s opinion

The majority of observations relate to the process of preparing the Draft CDP and associated zoning and objectives maps. The request to include school capacity as a criterion in the infrastructural assessment has been noted and is being used in this assessment, currently underway.

Section 6.3 Education of the current Sligo CDP 2017-2023 already includes adequate policies supporting the provision of education-related uses in a variety of land-use zoning categories, the upgrading and expansion of schools on their existing sites. Sufficient land has been reserved in all zoned settlements for school expansion or for the provision of new community facilities, including schools.

All the narratives, policies, objectives and development management standards relating to educational facilities will be updated in light of the observations made by the Department of Education.

CE-23 – Chief Executive’s recommendations relating to schools

The following additional provision should be considered when drafting the CDP 2023-2029:

- A. The Draft CDP 2023-2029 section relating to educational facilities shall be prepared taking account of the observations made by the Department of Education as part of pre-draft consultation.

3.12 Submission 58 – Fáilte Ireland (FI)

Fáilte Ireland, the National Tourism Development Authority, indicates that it “has invested significantly in key towns, initiatives and amenities in the County, such as the various Destination Experience Development Plans and through the Destination Town Funding Scheme”. These investments should be acknowledged and further progressed in the new Development Plan.

The recommendations made in FI’s are summarised below.

Tourism – dedicated chapter

The Draft CDP should have a dedicated chapter in relation to tourism. The chapter should recognise the significant role of tourism in the County and should contain all relevant policies and objectives.

Wild Atlantic Way

The Draft Plan should contain an objective “aiming to work in collaboration with Fáilte Ireland to ensure continued maintenance of discovery points and ensure access routes are maintained for all users”.

Destination Experience Development Plans (DEDPs)

The Draft Plan should include an objective acknowledging and supporting the implementation of existing and future Destination Experience Development Plans.

Destination Town Enniscrone

The new Plan should include reference to Enniscrone as a Destination Town and an objective to “support future tourism initiatives in Enniscrone in order to capitalise on the potential benefit of the funding for the town of Enniscrone”.

Mountain bike routes

The Draft CDP should include reference to Coolaney Mountain Bike Project and an objective to “support and promote the development of mountain biking routes/trails”.

Festivals

The new Plan should support new and existing festivals.

Town and village regeneration

The Draft Plan should “encourage the sensitive redevelopment and / or return to suitable use, of derelict, vacant or redundant buildings, in appropriate locations in order to provide for visitor accommodation and tourism development, while having regard to ecological constraints and architectural heritage requirements”.

Water-based activities

- The Draft CDP should include an objective supporting “the development of facility centres for water-based activities in the county to help sustainably manage the increased interest in water sports activities in certain locations as well as improving the overall visitor experience”.
- A reference to the National Surf Centre in Strandhill (national centre of excellence) should also be made.

Greenways and blueways

The Plan should support the development of new and existing greenways and blueways, promoting access for “on and off water-based activities”.

Tourist accommodation

- Quality accommodation should be supported in key locations (towns) in the County.
- The provision of alternative accommodation, such as holiday homes, motorhome parking, camping and glamping sites should be encouraged through policies, objectives and zoning.

Renewable Energy Strategy

The Draft Plan should be accompanied by a RES, including a map showing areas “suitable and unsuitable for the siting of wind turbines”.

Tourism amenities and assets maps

The Draft CDP should include a map or maps showing the following:

- “key nodes of tourism activity”
- transport links between nodes and identified routes (walking, cycling, greenways, blueways)
- “strategic tourism centres” (where key tourist services are located, e.g. accommodation)
- “sensitive environments” where “the provision of services must be sensitive and appropriate to the robustness / sensitivity of the receiving environment and in particular its existing tourism significance”
- “areas of unrealised tourism potential”
- branding, i.e. Failte Ireland “logos” such as Wild Atlantic Way.

Chief Executive's opinion

Section 4.4 Tourism development of the current Sligo CDP 2017-2023 already includes adequate narratives, policies and objectives addressing the issues raised in the submission.

All the narratives, policies, objectives and development management standards relating to tourism will be updated in light of the observations made by Failte Ireland.

The suggestion to prepare a Renewable Energy Strategy has been addressed in the Chief Executive's recommendation CE-13.D.

CE-24 – Chief Executive's recommendations relating to tourism development

The following additional provision should be considered when drafting the CDP 2023-2029:

- A. The Draft CDP 2023-2029 section relating to tourism development shall be prepared taking into account the recommendations made by Failte Ireland as part of pre-draft consultation.

3.13 Submission 60 – The Heritage Council on behalf of the Sligo Collaborative Town Centre Health Check Programme (CTCHC)

The submission made by the Heritage Council on behalf of Sligo CTCHC refers to a variety of themes, ranging from the request to “ensure the UN Sustainable Development Goals (SDGs) are at the heart of the new county development plan” to recommendations for “progressing a single source of geospatial truth for the whole of the county”, establishing “an open data source project similar to Colouring London” or formulating “a detailed Public Communications Strategy to ensure that the county development plan is successfully monitored and delivered”.

The recommendations which relate to the content of the next CDP are summarised below.

Key priorities

- Formulate and deliver a policy in accordance with the Programme for Government's emerging Town Centre First Policy for the designated key towns and villages;
- Include a specific policy to support the Collaborative Town Centre Health Check Programme for key settlements.
- Set targets for reducing vacancy in historic town centres;
- Establish indicators to monitor the implementation of the Town Centre First policy.

Town centres and building renewal

- Ensure that existing buildings are not needlessly demolished and replaced;
- Recognise that “buildings which are not now perceived to be part of the architectural heritage have a contribution to make to public goods”;

- Ensure that new housing developments protect and enhance the historic scale and grain of the county's towns;
- Include an objective to undertake CTCHC for Sligo Town every two years;
- Include an objective to 'pilot' a Conservation Area Regeneration Scheme (CARS)
- Include an objective to 'pilot' a Heritage Action Zone (HAZ) in a historic town centre within the county;
- Include an objective to "identify and develop a vibrant Student Quarter in Sligo Town Centre" together with IT Sligo, Sligo BID and the CRCHC Programme;
- Promote the reuse of traditional and landmark buildings in historic town centres as digital hubs, in line with government policy, i.e. focus on heritage-led regeneration;
- Support an audit of embodied carbon in existing buildings in historic town and village centres within the plan area.

Housing development

- Ensure that large-scale residential development proposals are within or adjacent to town centres and are close to public transport hubs;
- Include an objective to "formulate a Town Centre Living Strategy as soon as possible in partnership with the European Investment Bank (EIB), NWRA other private investment and social enterprise partners";
- include an objective to prepare a sustainable regeneration plan for publicly-owned land banks - focus on town centre sites, liaising with the Land Development Agency.

Town and village regeneration

- Develop "robust Enabling Policy and Streetscape Design Guidelines to support infill development in town centres and urban villages"
- Include an objective to undertake Noise and Air Quality/Pollution Mapping for key towns in order to inform strategies for enhancing and encouraging town centre living;

Transport and mobility

Establish a "priority greenway" linking town and village centres to the main railway and bus stations and establish a Heritage Loop walk in town centre environs.

Biodiversity

- The larger villages in the county should be enhanced by a range of biodiversity key species, which can play a significant role in enriching the users' experience. A softening of the built environment by means of pocket parks, orchards, pollinators and swift boxes enhancement can enhance the urban fabric as well as functioning as an ecosystem service.
- Commit to implementing the All-Ireland Pollinator Plan (2021-2025).

Chief Executive's opinion

The Issues Paper has already signalled the intention to prepare an enhanced chapter dedicated to town and village regeneration as part of the next CDP. This chapter will build on and expand the current provisions of Chapter 12 (Town and village design) of the CDP 2017-2023 and will include the main provisions for Sligo Town, to be further detailed as part of a subsequent LAP.

All the narratives, policies, objectives and development management standards relating to town and village regeneration and design will be updated in light of the observations made by the Heritage Council/Sligo CTCHC.

The suggestions relating to data processing and management will be considered separately, as their scope is larger than the development plan preparation process.

CE-25 – Chief Executive's recommendations relating to town and village regeneration

The following additional provision should be considered when drafting the CDP 2023-2029:

- A. The Draft CDP 2023-2029 chapter relating to town and village regeneration shall be prepared taking into account the recommendations made by the Heritage Council/Sligo CTCHC as part of pre-draft consultation.

3.14 Submission 64 – EirGrid

EirGrid functions as the national electricity Transmission System Operator (TSO), being responsible for the safe, secure and reliable transmission of electricity. EirGrid manages and operates the electricity transmission grid, bringing power from where it is generated to where it is needed.

After setting out the regulatory context, the national and regional policy framework, the submissions notes that demand for electricity is forecasted to increase by 50% above existing capacity in the next decade and that "significant progress in renewable electricity deployment will need to continue, with an increased deployment rate of all renewable electricity technologies".

EirGrid states that the North-West region has significant renewable energy resources and at present there is an excess of generation in the area. EirGrid is continuing to investigate the need to reinforce the grid in the north-west. The need for reinforcement is predicated on the level of renewable generation in both Donegal and western Northern Ireland.

It is emphasised that the next CDP should reflect EirGrid's need for robust policies to develop the electricity grid in a safe and secure way. The main recommendations are as follows:

- The Draft CDP should facilitate the development of grid reinforcements including grid connections and a transboundary network into and through the county, and between all adjacent counties and to support the development of international connections.
- The Draft Plan should set an appropriate context to ensure that large renewable energy projects and large energy consumers (data centres) are directed to spatially suitable

locations (e.g. data centres should be directed to spatially suitable locations to ensure efficient use of the existing transmission network).

Chief Executive's opinion

Electricity transmission is currently addressed under Section 11.17 of the CDP 2017-2023. The information contained in this section should be updated to bring it in line with the most recent national and regional policy documents.

The narratives, policies, objectives and development management standards relating to electricity transmission infrastructure will be reviewed in light of the observations made EirGrid.

CE-26 – Chief Executive's recommendations relating to electricity transmission

The following additional provision should be considered when drafting the CDP 2023-2029:

- A.** The Draft CDP 2023-2029 section relating to electricity transmission shall be prepared taking into account the recommendations made by EirGrid as part of pre-draft consultation.

Section 4

Submissions received from individuals and organisations

Most of the 73 submissions received from individuals, community groups and private or public organisations (other than prescribed bodies) have raised multiple issues. The issues have been thematically grouped under seven headings:

- **Strategic designations, compact growth and zoning objectives**
- **Population growth and housing development**
- **Economic development and smart growth**
- **Quality of life in towns and villages**
- **Transport and sustainable mobility**
- **Climate action and renewable energy**
- **Protection of the natural and built heritage**

The thematic groups of issues are addressed in the following sub-sections, with the Chief Executive's opinion and recommendations included **in purple type** at the end of each sub-section.

4.1 Submissions relating to strategic designations, compact growth and zoning objectives

(Submissions 8, 19, 20, 21,22, 23, 33, 48, 56, 75, 82)

Regional Growth Centre Strategic Plan area and proposed strategic designations

- The Regional Growth Centre Strategic Plan area should be extended to include the villages of Grange and Collooney.
- A "Sligo Education Quarter" (SEQ) should be established on lands to the west of the N-16 from Ballinode cross (Regional Stores junction) to the Manorhamilton roundabout (Abbvie roundabout), including the existing Sligo IT campus.
- Lands to the west of the future Eastern Garavogue Bridge should be designated as a business/science park and student accommodation linked with the SEQ.

Strategic Land Reserve

- Lands "sterilised in 2010" should be "released" because there is a lack of land available for housing in Sligo Town and County, and an undersupply of houses to buy or rent.
- Due to their proximity to Sligo's main employment centre (Finisklin) and the town centre, lands at Sea Road (currently included in the Strategic Land Reserve) are considered to be "strategically located to accommodate future development."
- Lands in "strategic locations such as Oakfield" can "assist Sligo County Council in answering the key questions asked within the Issues Paper".

Compact growth

- Compact growth could be promoted by facilitating the provision of convenience retail in neighbourhood centres and within mixed-use developments built at appropriate densities.
- The delivery of the Centre Block Masterplan (i.e. the redevelopment of Wine Street Car Park) is of great importance of compact growth in Sligo RGC.

Local area plans and masterplans

- A Local Area Plan should be prepared for Finisklin; this area could accommodate significant residential development, including high-rise buildings (up to 12 storeys).
- A masterplan should be prepared for the High Street area, to revitalise Sligo Town's core.

Zoning of lands for housing and business/enterprise uses

- The Draft CDP should facilitate the development of larger land banks which can "respond more quickly to housing need."
- Increased amounts of land should be zoned for business uses, to facilitate co-operation between private enterprises and IT Sligo.

Logistics-related uses

- An Post requests flexibility in zoning objectives, to allow "for the enhancement of existing facilities and the development of new postal infrastructure".
- The Draft CDP should include policies, objectives and zoning designations appropriate for "existing logistics, enterprise and commercial sites".
- The Plan should include a specific zoning objective worded as follows:

*Postal Facilities: A building which facilitates mail services that can include the processing, sortation and distribution of mail.**

**Note: This use can be assessed on a case by case basis appropriate to site context and all other relevant policies, objectives and standards set out in this Plan.*

- Postal facilities should be permitted in principle or open to consideration across all zoning objectives.

Retail uses

Supermarkets should be considered as "a use defined under appropriate zonings".

Public transport-related uses

The Draft CDP should ensure that sufficient land is reserved for the provision of new train stations with park-and-ride facilities in Coolaney and in Tobercurry.

Proposed new zoning objectives

The Draft CDP should consider zoning lands for the generation of "clean energy" and also lands reserved for "rewilding, rewetting, planting".

Chief Executive's opinion

Regional Growth Centre Strategic Plan area

The extent of Sligo Regional Growth Centre Strategic Plan area has been defined in the RSES, using population and employment data provided by Census 2016. The boundaries of the Sligo RGC SP are based on the CSO's Small Areas, which were selected to include all major employers and educational institutions, in addition to Sligo and its closest satellite villages of Ballysadare, Strandhill and Rosses Point. The opportunity of adjusting the boundaries of the RGC Strategic Plan may be explored in conjunction with the preliminary studies for the Local Transport Plan, and in consultation with the NW Regional Assembly. Data from the forthcoming Census 2022 should be able to confirm (or otherwise) the need to extend the RGC SP area.

Proposed strategic designations

The request to designate a "Sligo Education Quarter (SEQ)" on lands currently zoned CF (community facilities) is noted, as is the request to designate lands for a "business/science park and student accommodation" (currently zoned for mixed uses) linked with the SEQ.

It is considered the existing zoning of these lands allows for the provision of a variety of uses, including business, education and student accommodation respectively. The Draft Plan should examine the opportunity of introducing specific objectives for the future development of the subject lands. However, zoning requests cannot be considered at pre-draft stage.

Strategic Land Reserve

The current designation "Strategic Land Reserve" will no longer exist in the new development plan. Lands will be zoned on the basis of an infrastructural assessment, as specified in the NPF and RSES. Only lands categorised as Tier 1 (lands that are serviced) or Tier 2 (lands that are serviceable during the life of the development plan) can be considered for zoning.

The Chief Executive's recommendations CE-10.A-B relate to Tier 1 lands (that are serviced) and Tier 2 lands (that are serviceable) in terms of making zoning decisions.

Compact growth

A new "Centre Block" masterplan is currently being prepared by urban design consultants BDP. The redevelopment of the area generally known as Wine Street Car Park will include both residential and commercial components, together with a redesigned public realm.

The importance of convenience retail for the proper functioning of the Sligo's town centre and neighbourhood centres is acknowledged. The Draft CDP 2023-2029 should retain/update the specific objectives relating to neighbourhood centres in Sligo Town.

Local area plans and masterplans

The Planning and Development Act 2000 (as amended) requires the preparation of local area plans for settlements (or areas) with more than 5,000 residents, but does not preclude local authorities from preparing LAPs for any area, regardless of the size of its population.

Following the adoption of the CDP 2023-2029, a Local Area Plan will be prepared for Sligo Town, which includes Finisklin. It is not considered necessary to prepare a separate LAP for lands included in the Sligo Town LAP.

The "masterplanning" of the High Street area will be considered as part of the Courthouse Block regeneration. The area – which is delineated by Castle Street– Teeling Street – Old Market Street –

High Street– Market Street – is included in the RSES under Strategic Sites for Regeneration (Section 3.7(c), p. 116).

Pre-draft submissions relating to zoning

In accordance with the provisions of Section 11(2)(bc) of the Planning and Development Act 2000 (as amended), pre-draft submissions relating to zoning of particular land for any purpose are excluded and cannot be considered.

However, there is no restriction on responding to issues relating to zoning objectives and their general applicability, if submissions do not request a specific zoning for a specific site.

Zoning of lands for housing and for business/enterprise uses

The Draft Development Plan Guidelines (August 2021) recommend a compact growth approach to residential zoning, through the prioritisation of lands closest to the centres of settlements. A Specific Planning Policy Requirement, SPPR DPG 7, places the following obligation on the County Council:

SPPR DPG 7

Planning authorities shall adopt a sequential approach when zoning lands for development, whereby the most spatially centrally located development sites in settlements are prioritised for new development first, with more spatially peripherally located development sites being zoned subsequently.

The size of a land bank is not among the criteria used in the sequential approach. Besides location, other factors, such as accessibility or the availability of service infrastructure, are more useful in determining the suitability of lands for residential development.

The infrastructural assessment currently being carried out by the Development Planning Unit of Sligo County Council does not use “size in hectares” as a criterion for prioritising lands for residential development.

With regard to employment-related uses, the Guidelines indicate that the development plan “must include a rationale for any requirement to zone additional lands, based on projected population, economic and employment growth and change over the lifetime of the development plan”.

As part of the Plan preparation process, the extent of lands zoned for employment-related uses will be assessed and, if it appears to be necessary, increased or decreased.

Logistics-related uses

Similar provisions of the Draft Development Plan Guidelines apply to logistics-related uses as to general employment uses. The guidelines specify that “Differing typologies of commercial /industrial land uses will generate different employment characteristics (e.g. high-intensity commercial office use in comparison to lower intensity warehousing/logistics) and these should be considered in the overall strategic assessment.”

Retail uses – supermarkets

Appendix B of the Draft Development Plan Guidelines recommends a set of standardised zoning objectives. “Retail”, which includes convenience shops such as supermarkets, would be permitted in town centres, district centres, local centres, business parks, with appropriate policy safeguards to prevent such developments at locations poorly served by public transport.

The zoning objectives defined in the Draft CDP 2023-2039 should be in accordance with the standards recommended in the Draft Development Plan Guidelines.

Public transport-related uses

The relevant zoning objective recommended in the Draft Development Plan Guidelines is “Transport and Utilities” (TU), which should apply to lands reserved for development associated with public transport.

Proposed new zoning objectives

While the written statement of the development plan must support the provision of energy and ensure nature conservation within and outside designated sites, there is no explicit requirement to zone lands for such activities.

None of the standardised zoning objectives listed in Appendix B of the Draft Development Plan Guidelines relate to land uses such as the generation of energy or the rewilding/rewetting/planting of degraded lands.

However, there is no planning impediment to rewilding, rewetting or planting in rural or urban areas.

With regard to renewable energy generation, this will be appropriately addressed in the Energy section of the Draft Plan, without the need to zone specific sites for such uses.

CE-27 – Chief Executive’s recommendations relating to strategic designations and compact growth

The following additional provisions should be considered when drafting the CDP 2023-2029:

- A. In conjunction with the preparation of the Local Transport Plan, explore the opportunity of expanding the boundaries of the Sligo RGC SP area, to include the satellite villages of Collooney and Grange. This shall be done in consultation with the Northern and Western Regional Assembly.
- B. Consider the need for including specific development objectives for lands associated with IT Sligo and adjoining areas.
- C. The Core Strategy of the Draft CDP 2023-2029 shall confirm the Council’s intention to prepare a local area plan for Sligo Town and shall define the urban areas where development shall take place on the basis of a masterplan.
- D. The Draft CDP 2023-2029 shall update the specific objectives relating to neighbourhood centres in Sligo Town, after examining the issues that prevented the implementation of those objectives initially included in the Sligo and Environs Development Plan 2010.

CE-28 – Chief Executive’s recommendations relating to zoning objectives

The following additional provisions should be considered when drafting the CDP 2023-2029:

- A. As part of the Plan preparation process, the extent of lands zoned for employment-related uses shall be assessed with regard to previous take-up and development constraints. If it appears to be necessary, the extent of land zoned for such uses shall be modified.
- B. The zoning objectives defined in the Draft CDP 2023-2039 shall be in accordance with the standards recommended in the Draft Development Plan Guidelines (August 2021).

4.2 Submissions relating to population growth and housing development

Housing in both urban and rural areas was the subject of a large number of individual submissions. Among the most prominent issues raised are the undersupply of houses in urban areas (Sligo Town in particular) and the policy restrictions applicable to residential development in rural areas under urban influence.

The housing needs of older people, in particular the desire to live in their homes for as long as possible, were also highlighted, along with requirement for diversification of the housing offer.

Issues relating to housing in urban areas were raised in Submissions 10, 14, 19, 20, 22, 23, 38, 42, 47, 48, 61, 73, 82, 89).

Submissions 23, 26, 29, 31, 32, 35, 47, 49, 51, 52, 53, 54, 55, 61, 65, 66, 67, 68, 69, 72, 79, 80, 83, 84, 85, 86, 89 referred to issues relating to housing in rural areas.

Population growth and future spatial distribution

- The increase of population in Sligo Town should be discouraged; development should be “dispersed to the less populated areas of the County”
- The Draft CDP should take into account “rural depopulation, rural isolation and reduced services in rural areas”.
- It will be necessary to determine the population increase in Strandhill before zoning additional lands for housing.
- An “assessment of needs of the demographics”, with regard to housing, should be carried out.

Housing and older people

- The CDP should support older people to live in their own home for as long as possible, by embedding “ageing in place” options.
- Targeted residential typologies should be included in the recommended mix of house types and specific housing for older persons should be included in all schemes.

Affordable and co-operative/community-led housing

- Self-help and co-operative housing initiatives should be encouraged.
- The Draft CDP should ensure that affordable housing is provided in Strandhill, especially for those born there.
- The “co-housing model” should be piloted on a small-scale, town-centre, brownfield site, as a partnership between the Council (as landowner) and a Community Company (as developer)

Housing undersupply

- There is a lack of land available for housing in Sligo Town and County, and an undersupply of houses to buy or rent.
- Lands “sterilised in 2010” should be “released” because there is a lack of land available for housing in Sligo Town and County, and an undersupply of houses to buy or rent.

- Among the barriers to the adequate provision of housing in Sligo are the restrictions on building housing on lands zoned as Strategic Land Reserve.
- The Draft CDP should stimulate the construction of houses on serviced lands by “encouraging flexibility that will accommodate lands coming forward for development, subject to a set of criteria”.
- Vacant housing in towns should be “prioritised for development”.

Housing priorities

- Housing Supply Target Methodology to be applied in order to determine the appropriate targets for inclusion in the Draft CDP.
- The Draft CDP should accommodate new housing growth in a sustainable manner, having regard to available infrastructures to service lands identified for residential development.
- Future residential development in Sligo must incorporate a range of housing types such as apartments, detached/semi-detached, duplexes etc.
- The Draft CDP should provide “a range of Low Density Residential (LDR) lands throughout the plan area”, in order to “attract managerial staff to existing and future industry as well as lecturing staff to the new Technological University”.
- “The developers perceive significant risk with town centre brownfield sites particularly in a time when prices and availability of materials are volatile. The Strategic Land Reserve should be relaxed so as to allow the development of larger land banks which can respond more quickly to housing need.”
- “Given Sligo is a town and Regional Centre and is not trying to compete on the same level as the cities of Ireland, high density developments and apartment focused developments are less attractive”. **Densities lower than 30 units per hectare** should be considered as the most appropriate option for new developments.
- New residential development should take place in the “southern environs of Sligo Town”.
- Large-scale residential development proposals should be within or adjacent to town centres and close to public transport hubs.
- Large housing schemes should be phased. It should be recognised in the Draft Plan that some amenities such as green areas, creches, pre-schools and playgrounds can be provided in later phases, “in the interests of protecting the viability of a proposed scheme”.

Rural housing – general considerations

- The Plan should “promote the development of rural communities both within and outside town and village boundaries”.
- The existing restrictions on one-off rural housing “should be reversed”.
- “Residential development in rural areas, outside of the towns and villages, should be supported where applicants have a strong family connection to a location, including ancestral, family, farming or school links”.

Housing in rural areas under urban influence

The Draft Plan should sustain rural communities in rural areas under urban influence and should “ensure that families can continue to build on family land to uphold their presence in the area in which their ancestors belong for current and future generations”.

Rural housing around Knocknarea (Submissions 51, 52, 53, 54, 55, 72, 79, 83, 84, 85, 86)

- The Draft Plan should not deny “the rights of the next generation by prohibiting them from building homes on their own lands”
- People who live in Culleenduff, Primrose Grange, Grange West, Glen Road and Woodpark areas have the right to build a house for their families, like previous generations.

Demonstrating a rural housing need

(quasi-identical request in Submissions 26, 29, 31, 32, 35, 49, 65, 66, 67, 68, 69, 80)

- Applicants with “rural links” to an area through long standing existing and immediate family ties seeking to develop a family home on existing family holdings shall be deemed to have established a Substantiated rural housing need”.
- “The ownership by family members (persons other than the applicants) of additional dwellings in the area shall not be used to negate the housing need of the applicant.”

Housing along national roads and scenic routes

- Sligo County Council should “assist those who apply for planning permission along national routes to secure planning permission where there is a valid planning application for housing or other developments as required”.
- Sligo County Council should grant planning permission for the development of housing or other farm developments along scenic routes. This includes parts of West and North Sligo along the Wild Atlantic Way.

Chief Executive’s opinion

Population growth and future spatial distribution

The National Planning Framework recognises Sligo as a Regional Centre capable of being a growth driver to a greater extent than any other towns in the North-West.

The RSES envisages a 40% increase in Sligo City’s population by 2040, equivalent to circa 8,000 additional residents, giving a total of 26,000 people. Intermediate “targets” are set for 2026 (+4,400 persons) and 2031 (+2,200).

Appropriate targets for the life of the development plan need to be incorporated into the Draft CDP 2023-2029. It would be against national and regional policy to discourage population increase in Sligo Town.

Demographic data provided by Census 2016 offer no evidence of rural depopulation. On the contrary, there is empirical evidence of migration of urban dwellers to rural areas since the beginning of the Covid-19 public health emergency.

The issues of rural isolation and reduced levels of services in rural areas can only be prevented in the future by supporting population growth in towns and villages, in accordance with national and regional policy.

With regard to assessing the housing needs of various demographic groups, there is a requirement to carry out a Housing Need and Demand Assessment (HNDA) in accordance with the Circular Housing 14/2021 issued on 14 April 2021 by the DHLGH.

The Chief Executive recommendation CE-7.G has already specified that a HNDA needs to be carried out for the County, to inform the Housing Strategy and the housing policies of the CDP 2023-2029.

Housing and older people

The current CDP already contains a strategic housing policy (SP-HOU-3) and a separate section (5.5 Housing for person with diverse needs) relating to the housing needs of older people and special-needs persons.

The Housing Strategy associated with the development plan will contain similar or updated recommendations for residential typologies and mix of house types able to ensure “ageing in place” by design. All relevant recommendations of the Housing Strategy will be incorporated as relevant policies, objectives and development management standards in the new CDP.

Affordable and co-operative/community-led housing

Voluntary and co-operative housing is supported by the Council, as expressed in Section 5.4.2 and policy P-VC-HOU-1 of the current Plan. This support will continue to be part of the next CDP provisions.

Housing undersupply

While the recent year’s undersupply of houses in Sligo Town and County has been acknowledged in the Issues Paper, the causes are multiple and cannot be reduced to “lack of land available for housing”. In fact, there is more than enough land zoned at present to allow the achievement of RSES long-term housing targets for Sligo Town and County.

It is acknowledged that certain lands currently included in the Strategic Land Reserve are more likely to be developed for housing than other lands zoned for residential uses. However, the current designation “Strategic Land Reserve” will no longer exist in the new development plan. Lands will be zoned on the basis of an infrastructural assessment, as specified in the NPF and RSES. Only lands categorised as Tier 1 (lands that are serviced) or Tier 2 (lands that are serviceable during the life of the development plan) can be considered for zoning. It is expected that the supply of new dwellings will gradually increase under the revised zoning of the new CDP.

Housing in urban areas – future priorities

As already discussed in Section 2 of this report, the location of new housing areas will be determined by applying a sequential approach after carrying out an infrastructural assessment. As part of designating Settlement Consolidation Sites and Long-Term Strategic and Sustainable Development Sites (refer to CE-8.A in Section 2), appropriate phasing of large-scale residential development will be considered.

The amount (number) and typologies of future residential development will be determined through Housing Need and Demand Assessment, which will provide the basis for the new Housing Strategy.

The requests to consider densities lower than 30 units per hectare as “the most appropriate” and designate a Low-Density Residential (LDR) area in the new Plan is in conflict with the requirements of the Sustainable Urban Development Guidelines (2009).

The Draft CDP must ensure that the density of new residential development is in accordance with the Guidelines and the Circular NRUP 02-2021 relating to the application of residential densities in towns

and villages. The Circular Letter clarifies that densities lower than 30 units per hectare can be considered, but only under specific circumstances.

Housing in rural areas

The rural housing policy of the Draft CDP 2023-2029 has been addressed as part of the Chief Executive's response to the submission made by the Office of the Planning Regulator (OPR).

The policy restrictions currently applicable in the *rural areas under urban influence* are in accordance with the requirements of the NPF and RSES and cannot be "reversed".

The 2020 CDP Variation has already amended the strategic housing policy SP-S-4, which now specifies that in *rural areas under urban influence* the Council will "*facilitate the provision of single housing in the countryside based on the core consideration of demonstrable economic or social need to live in a rural area and siting and design criteria for rural housing in statutory guidelines and plans, having regard to the viability of smaller towns and rural settlements*".

In line with national and regional policy, applicants are not required to have "rural links", but they need to demonstrate **an economic or social need** to live in the specific rural area where permission for one-off housing is sought, **in addition** to compliance with normal planning considerations.

The next CDP shall ensure that the rural housing policy of Sligo County Council remains compliant with the requirements of NPO 19, as recommended by the Chief Executive under CE-11.C.

Housing along national roads and scenic routes

The issue of access to national roads is relevant to all types of development, not only to rural housing. The same is true in relation to development along scenic routes.

CDP policy regarding access to national roads is and must remain compliant with the Spatial Planning and National Roads Guidelines, as recommended by the Chief Executive under CE-10.E

Development along scenic routes will continue to be assessed on the basis of the Landscape character assessment and protection policies (as updated) of the new CDP.

CE-29 – Chief Executive's recommendations relating to housing development

The following additional provisions should be considered when drafting the CDP 2023-2029:

- A.** The Housing chapter of the Draft CDP 2023-2029 shall include appropriate narrative, policies and objectives reflecting the recommendations of the Housing Strategy, which shall be based on a Housing Need and Demand Assessment.
- B.** The Draft CDP 2023-2029 shall ensure compliance with the requirements of NPF/RSES (in terms of location of future housing) and with all applicable Section 28 ministerial guidelines (in terms of residential densities, typologies, heights and design of new developments). All relevant parameters shall be specified in the Development Management Standards chapter.

4.3 Submissions relating to economic development and smart growth

(Submissions 8, 18, 19, 25, 36, 47, 56, 59, 61, 78)

Economic development – general considerations

- The CDP should provide support to economic actors, in line with the new LECP.
- The Draft CDP should acknowledge “the importance of air access and Ireland West Airport as an economic and tourism driver for Sligo and the whole North West economy” and “prioritize the SDZ for job creation as part of an overall balanced regional development strategy”.
- The Draft Plan should include policies / land use zoning objectives to support the provision of infrastructure/ development on Coillte lands where suitable, for such as tourism, commercial, business/ enterprise, community facilities etc.

Retail development

- The Draft CDP should acknowledge the importance of convenience retailing as an employment opportunity, in addition to its role in meeting local shopping needs.
- The Plan should promote “plan-led convenience retail” reflecting population targets.
- Town centres should be made more attractive to encourage footfall.
- “Specific units” should “pay lower rates if they are beneficial to raise the profile of the town centre”.

Rural enterprise

- The Plan should support local enterprise development on farms (in rural areas).
- People living in rural areas should be supported to work from home. Provision should be made for working from home and from community hubs in the Regional Growth Centre Strategic Plan area.
- Farmers should be “exempted” from development charges on “investments on farm that contribute positively to the environment and allow the farmer to farm more efficiently”.

Tourism

- The Plan should promote the development of the IW Airport “as the international gateway to Sligo” and should acknowledge “the importance of air access and Ireland West Airport as an economic and tourism driver for Sligo.
- The Draft Plan should include policies facilitating forest-based tourism accommodation (such as woodland lodges) at suitable locations in the Coillte estate, subject to all environmental and design considerations,
- The Draft Plan should include policies / land use zoning objectives to support the provision of infrastructure/ development on Coillte lands where suitable, for tourism-related uses.
- Road noise reduction along the N-15 would benefit walking, cycling and thus attract more tourists to North Sligo.
- The rural economy would benefit if facilities were provided along cycle routes, e.g. bike hire/rental units, shelter/toilet buildings, viewing platforms, tourist information centre(s) at former level crossing houses (in the case of the greenway along the former railway).

Smart growth and digital infrastructure

- The Draft Plan should include increased supports for business and encourage co-operation between public and private sectors with IT Sligo in building “an effective Smart Region”, including installation of appropriate infrastructure.
- **Broadband** – the provision of a 5G network will require more masts along the main roads, “so as to facilitate the use of autonomous vehicles”. The CDP should recognize these requirements and provide “realistic guidance on the siting of such masts”.
- **Smart/digital infrastructure** – car pooling apps should be developed in conjunction with I.T. Sligo, and rolled out for major centres of employment such as Sligo University Hospital, I.T. Sligo and throughout Finisklin.

Chief Executive’s opinion

Economic development considerations

Both the CDP and the LECP are required to comply with the provisions of the RSES and support the implementation of RPOs relevant for Sligo. It is evident that the CDP 2023-2029 will have to be consistent with LECP, which is currently under preparation as part of the Sligo 2030 Strategy.

The CDP will share the vision and incorporate the spatial requirements of the specific actions included in the LECP, particularly with regard to economic development and smart growth. These requirements can take the form of land-use zoning at strategic locations, as well as strategic or general policies and specific objectives supporting businesses, retail and commercial development, as well as tourism and rural enterprise.

Chapter 4 in the current CDP already includes provisions addressing the vast majority of issues raised in submissions, in the following sections:

- **4.1.1. and 4.4.6 - LECP provisions** (needs to be updated in line with the Sligo 2030 Strategy)
- **4.2 Industry and enterprise** (strategic policies remain fully relevant)
- **4.3 Rural development and enterprise** (including rural development and farm income diversification, specific policy for remote working from rural areas, P-RDD-3)
- **4.4 Tourism** (which should be updated to include references to the important tourism potential of Coillte-owned forestry)
- **4.5 Retail planning** (including the retail hierarchy in the County and policies supporting retail development in town centres)

Some of the issues raised in submissions are better addressed in other chapters (e.g. noise reduction on national roads), others are outside the scope of the development plan, such as the proposed exemption from “development charges” for certain farm developments.

The next review of the County Council’s Development Contributions Scheme will be subject to public consultation and may consider new exemptions for developments that enhance the environment.

Smart growth and digital infrastructure

The RSES indicates that “the ICT sector is pivotal in growing a smart region and is pivotal in growing an entrepreneurial region” and that in order “to maximise the creation of ICT jobs throughout the region, the delivery and reach of the national broadband scheme (NBS) is key” (in Chapter 4 of the RSES, p. 181).

The consultants currently preparing the Sligo 2030 Strategy/new LECP have gathered a substantial amount of data through desktop studies and public consultation, including a series of online workshops. It is expected that the new LECP will include an important section dedicated to Smart/Digital Growth.

The spatial consequences of the Smart/Digital Growth component of the Sligo 2030 Strategy will be assessed as part of the Draft Plan preparation and will be appropriately reflected in the narrative, policies, objectives and zoning of the new Plan.

CE-30 – Chief Executive’s recommendations relating to economic development and smart growth

The following additional provisions should be considered when drafting the CDP 2023-2029:

- A.** Ensure that the Draft CDP 2023-2029 is fully aligned with the Sligo 2030 Strategy/new LECP and it incorporates the spatial requirements of the 2030 Strategy in the form of appropriate policies, objectives and zoning.
- B.** The Economic Development chapter shall include a section relating to Smart/Digital Growth, implementing the relevant RPOs and the relevant smart growth-related actions specified in the Sligo 2030 Strategy/LECP.
- C.** In the Tourism section of the Draft CDP 2023-2029, include references to the important potential of Coillte-owned lands to host a variety of tourism-related activities, subject to normal planning and environmental considerations.
- D.** In the Tourism section of the Draft Plan, include references to the tourism-related facilities that can be provided in conjunction with greenways.

4.4 Submissions relating to the quality of life in towns and villages

(Submissions 10, 13, 14, 18, 19, 23, 25, 27, 30, 33, 38, 45, 47, 48, 59, 61, 73, 78)

Vacancy in town centres

- Sligo should avail of the Living City Initiative [Note: LCI is a tax incentive scheme designed to regenerate both historic buildings and other buildings in specified cities]. This should “include long term vacant commercial properties built post-1915 in Sligo as specified in the NPF”.
- The preparation of the Draft CDP should include a survey of all vacant properties (i.e. shops that have closed and not re-opened) to identify those which can be repurposed for residential use.

Age-Friendly Agenda

There should be “a strong message within the narrative that the Age Friendly Agenda is being applied to all chapters”, i.e. Urban Regeneration, Transport, Housing etc.

Urban brownfield sites

An Post may consider the expansion of facilities, consolidation on its existing lands, redevelopment of sites “which are no longer fit for purpose” or relocation to more suitable sites.

Public realm improvements

- Public realm enhancements along local rivers should be “encouraged” in Dromore West, Enniscrone, Drumcliff and Grange.
- The Draft Plan should provide for reductions in speed limits and resurfacing of roads, in order to lower the noise generated by road traffic.

Safe walking and cycling in urban areas

- Safe walking, safe cycling, traffic calming, speed limits of 30 km/h in built-up areas, segregation of cycle lanes, signposting of cycle routes, links between residential areas and schools, secure (and covered) bicycle parking at shopping destinations and places of work.
- Improve the cycling and walking infrastructure by providing “shielded cycle lanes” and “covered walking tracks” between residential/employment areas and public transport hubs.
- The Draft Plan should require new developments in town centres to include facilities for walking and cycling (bike racks, changing rooms, showers).

Community facilities – general considerations

- The Local Authority should consider the provision of new community services and amenities on its own lands.
- The Draft Plan should support the provision of services such as GP practices, post offices, schools, convenience stores in villages and rural areas.

Specific requests – Carraroe (or Carrowroe)

- The Draft Plan should provide for the “development or restoration of local communities” like Carraroe/Carrowroe through a “Village Community Concept” (signage, lighting, road realignment, traffic removal, supported housing for old people etc.).

- Request for “the provision of a connected sewerage system” to be linked to the Sligo Town System, in order to support a “housing complex” in the Carraroe/Carrowroe) area.

Specific requests – Rathcormac

Having regard to the increasing need for wastewater treatment services in the village of Rathcormac (primary school with 240 students, Yeats Tavern, Vintage Café, Branley’s Yard, existing individual treatment systems and a growing demand for serviced sites in the area), it is requested that “a survey be carried out” and “a design be forwarded to Irish Water with a recommendation of support”.

Specific requests – Strandhill

- Request for lands to be “earmarked” for the development of a community “hub” with indoor and outdoor sports and recreation facilities, as well as a community park.
- Requirement for community facilities, swimming pool and supermarkets to be provided in conjunction with new housing.
- Need for a “village centre” at the “airport / Strand Campus area”, where a masterplan should be prepared in order to integrate commercial and community facilities.

Specific requests – Tobercurry

- The sewer network requires extension to facilitate development of the town to the south-west”.
- The Draft Plan should include an objective to provide a „multi-purpose recreational centre with an indoor swimming pool”.

Recreational walking and cycling routes – general considerations

- The Draft CDP should include policies promoting “walking, rambling and cycling” within the county, similar to P-TOU-6 of the Sligo CDP 2017-2023.
- The development of greenways should be done in consultation with farmers and landowners along the routes.
- Where possible, greenways should be developed along existing routes where there is no disruption to landowners or farmers.

Recreational walking and cycling routes – specific requests

- The road from the Holy Well to Tonaphubble, in Sligo Town, should be closed to traffic (except for residents) and reserved for walking and cycling.
- A greenway should be provided between Bundoran and Grange.
- The following walking and cycling links should be provided:
 - extension of the River Walk in Coolaney to Mill Falls in Collooney;
 - link from Carrowmore School and Knocknashee walking trail to the Greenway (i.e. the proposed greenway from Collooney to Bellaghy);
 - integration of Tobercurry forest trail into the Greenway network, link to the town square;
 - link from Curry village to the Greenway along the river.

Chief Executive's opinion

Vacancy and brownfield sites in town and village centres

The issue of town centre vacancy is acknowledged and has been the subject of surveys for a number of years. The application of tax incentives under the Living City Initiative is outside the remit of Sligo County Council and outside the scope of its development plan. The next CDP can only ensure that policy support is in place for any government funding mechanism that might help reduce vacancy on the centres of towns and villages.

Brownfield sites in towns and villages, both central and out-of-centre, will be evaluated as part of the infrastructural assessment before a zoning objective is assigned to each of these sites, as appropriate. This would include existing An Post sites in town centres, if such sites are to become vacant following relocation of postal facilities to more suitable areas.

Age-Friendly Agenda

The needs of older people must be adequately addressed in all relevant chapters of the CDP, especially in those relating to Housing, Sustainable Mobility, Community Facilities and Outdoor Recreation. In June 2021, Age Friendly Ireland published *Age Friendly Principles for the Planning Authority*. This document contains guidelines and suggests wording for relevant policies to be included in development plans. It is intended to use these guidelines as part of the preparation of all relevant chapters of the Draft CDP 2023-2029.

Public realm improvements, safe walking and cycling

The Town and Village Design chapter (Chapter 12) in the current CDP contains limited provisions regarding the public realm of settlements and their circulation networks. This chapter, which is now focused mainly on design, should be expanded to include more detailed provisions to address vacancy, redevelopment of brownfield sites, housing options and community/cultural/recreational facilities supporting "ageing in place", as well as safe walking and cycling for all residents.

The specific requests for public realm improvements and for safe circulation within built-up areas are noted and agreed.

As signalled in the Issues Paper, it is intended to prepare an enhanced chapter on Town and Village Regeneration for inclusion in the Draft CDP 2023-2029. This chapter should appropriately address the design of public spaces to make them attractive and safe for users of all ages, focusing on pedestrians and cyclists, while allowing access for the necessary motor traffic.

Community facilities and local services

In addition to the general policies and objectives of the new Town and Village Regeneration chapter of the Draft CDP 2023-2029, location-specific provisions may be made for towns, villages and the suburban areas of Sligo Town, currently included in the Sligo and Environs Plan.

Such provisions will be included either in the forthcoming Sligo Town LAP (e.g. public realm interventions and support for community facilities and wastewater infrastructure in Carrowroe), other LAPs (if a decision is made to review/ prepare such plans for Ballymote, Enniscrone and Tobercurry) or in the updated mini-plans for villages such as Rathcormac or Strandhill (currently contained in Volume 2 of the CDP).

General policies and objectives for community facilities will be included in the relevant chapter of Volume 1 of the Draft CDP 2023-2029, while service infrastructure will be appropriately addressed in the corresponding chapter of the new Plan.

Outdoor recreation

Walking and cycling are addressed in both the Transport and Sustainable Mobility chapter (Chapter 8) and the Outdoor Recreation section (Section 6.7) of the current CDP. While there may be a small degree of overlapping, particularly regarding greenways, the Outdoor Recreation section contains no less than 24 policies relating to parks, playgrounds, sports facilities, access to natural areas and features, as well as rights-of-way.

The general policies of the Outdoor Recreation Section, as updated in the Draft CDP 2023-2029, should continue to have corresponding objectives for towns and villages, to be specified either in LAPs or in mini-plans, as is the case at present.

The proposals for new recreational walking / cycling routes are noted and will be taken into consideration as part of the Draft Plan preparation.

CE-31 – Chief Executive’s recommendations relating to the quality of life in towns and villages

The following additional provisions should be considered when drafting the CDP 2023-2029:

- A.** Ensure that the needs of older people are adequately addressed in all relevant chapters of the CDP, especially in those relating to Housing, Sustainable Mobility, Community Facilities, Outdoor Recreation, Town and Village Regeneration as well as in the mini-plans included in the CDP.

The guidelines contained in the publication *Age Friendly Principles for the Planning Authority*, issued in June 2021 by Age Friendly Ireland, shall be applied insofar as is possible.

- B.** The expanded Town and Village Regeneration chapter of the Draft CDP 2023-2029 shall include more substantial sections/provisions relating to public realm improvements, vacancy reduction, redevelopment of brownfield sites, housing options and community, cultural and recreational facilities supporting “ageing in place”, as well as safe walking and cycling for all residents.

4.5 Submissions relating to transport and sustainable mobility

(Submissions 5, 8, 10, 13, 14, 19, 24, 25, 27, 30, 33, 36, 37, 45, 47, 48, 59, 61, 73, 75, 77, 78, 89)

A total of 23 submissions raised transport-related issues. While most of these were received from private individuals, submissions were also made by special interest groups like Sligo Greenway Co-Op, Sligo Cycling Campaign, West=On=Track, or organisations such as IT Sligo, An Post, Ireland West Airport Knock.

Local Transport Plan (LTP)

The forthcoming LTP should extend to serve Collooney, Ballysadare, Strandhill, Rosses Point and Grange.

Motor traffic reduction in Sligo Town

- The Draft Plan “needs to reflect how the transport and sustainable mobility policies will facilitate the 15-minute liveable neighbourhoods”
- “Deeper and broader consultations should be undertaken across the community to reduce the volume of traffic coming into Sligo”.
- The N-4 should be “realigned” so that it “does not go through Sligo’s western edge”, through residential and retail areas from Summerhill to the junction with the N-16.
- Provide free car parking areas on the periphery of Sligo Town. Provide pedestrian links between these areas and the town centre.

Access to urban areas for postal delivery vehicles

- Future An Post facilities may require greater levels of parking spaces including electric vehicle charging points, for delivery vehicles, staff cars and customers collecting mail items.
- Request for “flexibility with car parking standards” for existing postal facilities which may need to expand.
- The Draft Plan should recognise the need for 24-hour access to postal facilities. Restrictions should not be placed on the times of deliveries or collections to/from postal premises in town centres.
- Public realm plans should ensure that vehicular access to postal facilities is retained.

Public transport - Sligo Town bus service

- The Draft Plan should include policies and objectives which are supportive of the delivery of public transport in the town, in the interest of promoting public transport use and delivering modal shift in accordance with the requirement to reduce carbon emissions in the transport sector.
- Public transport should include commuting by shuttle bus from park-and-ride locations in the Sligo Regional Growth Centre Strategic Plan area to Sligo Town.
- A regularly operated electric bus should operate between IT Sligo and St Angela’s College.

Active travel – cycle routes

- The Draft Plan should acknowledge the preparation of the Sligo Cycle Network Plan and the opportunities it will bring to assist with the delivery of improved facilities for sustainable modes of transport and realising modal shift.

- Request to upgrade the R286 and the Lough Gill loop road to include a cycle path to improve movement between IT Sligo and St Angela's College and enhance safety of users.
- The Draft CDP should provide for safe cycling routes between settlements. This should be done via a "signed network" of low-traffic local roads.
- Cycle lanes should be provided along the N-15 in North Sligo, where the national road crosses the villages of Drumcliff, Rathcormac, Grange and Cliffony.
- A greenway should be provided between Bundoran and Grange.

Active travel – facilities for cyclists

- The CDP should "focus on active travel facilities so as to provide increased mobility within the urban area of Sligo and connections to local amenities".
- The Draft DCP should include specific policies on cycle parking in the urban realm and in private developments. The NTA recommends the *Standards for Cycle Parking and Associated Cycling Facilities for New Developments* document issued by Dun Laoghaire-Rathdown County Council in 2018.
- The Draft Plan should require new developments in town centres to include facilities supporting cyclists (bike racks, changing rooms, showers).

Requirements for safe cycling and walking

- Streets should have sufficient space for segregated cycle lanes; less space for car parking.
- Cycling infrastructure should be provided safely through junctions with main roads such as the N4.
- Cycling routes should be signposted, e.g. from the Strandhill Road to Sligo University Hospital and IT Sligo or from Calry to Finisklin.
- Safe cycling routes should link residential areas to schools.
- Wide kerb radii at junctions lengthen pedestrian's distance (and time) needed to cross the road, while allowing cars to turn the corner quickly.
- Traffic light waiting times are too long for pedestrians.
- Uncontrolled parking on footpaths should be prevented.
- Sufficient safe crossings should be provided in towns and villages traversed by national roads.
- Speed limits of 30 km/h should be introduced in built-up areas.

Major transport infrastructure projects

- The Draft Plan should include an objective to complete the Eastern Garavogue Bridge within the lifetime of the plan.
- Request for a foot and bike bridge connecting the IT Sligo on the north side of Ash Lane with the land on the south side, to link the Institute to the town centre via a safe and accessible facility.
- The Draft Plan should include an objective to complete the three sections of the N-16 at Lugatober within the lifetime of the plan.
- The improvement of the N-17 is likely to divide farmland and require rural dwellers "to take detours to get where they are going". A realignment of the N-17 "is sufficient and possible".

Public transport – airports

- The Aerodrome Safeguarding Zone of Ireland West Airport Knock extends into County Sligo. The Draft CDP should include a policy in this regard.
- The policy should specify that relevant proposed developments will be assessed with regard to potential conflicts with the aerodrome safeguarding requirements “specified by the International Civil Aviation Organisation (ICAO) and the European Aviation Safety Agency (EASA).

Rail transport – general considerations

- The Draft CDP should amend the strategic transport policy SP-TRA-2 “to include retention of the Sligo Quay Iarnród Éireann freight facility with a view to its future use as an intermodal rail freight hub”.
- Public transport policies P-PT-1 and P-PT-4 should “take note of the mention on page 49 of Iarnród Éireann Strategy 2027: “Reconfiguration of Sligo station and passing loop at Ballymote”.
- Public transport policy P-PT-5, which specifies that the Council will “Examine the feasibility of reopening the Western Rail Corridor, as a strategic transport corridor linking Sligo and the North-West with Mayo, Galway and Limerick in the context of the new rail policy to be developed by the DTTaS”, should be amended to take account of the **All-Island Strategic Rail Review** (currently being prepared by consultants ARUP, due to be completed by the end of 2022)
- The Draft CDP should resolve the perceived conflict between the current objective O-CW-5 (seeking the development of a greenway on or along the disused railway line from Claremorris to Collooney) and policy P-PT-5, as “it will compromise the re-opening of the Western Rail Corridor”. It is indicated that “The preferred option would be to seek additional funding now to build the greenway at a safe distance from the railway.”
- The Draft CDP should ensure that sufficient land is reserved for the provision of new train stations with park-and-ride facilities in Coolaney and in Tobercurry.
- The Draft Plan should include a policy “To work with the National Transport Authority & Iarnród Éireann to safeguard and protect all existing or historic rail lines and associated facilities from redevelopment for non-transport related purposes, in order to not preclude their future use as an operational transportation network”.
- The CDP should include a declaration recognising “the importance of ensuring that strategic assets, particularly sustainable transport assets such as the WRC (which can also play a crucial role in terms of meeting climate change obligations) are protected and promoted as a key enabler in facilitating the effective functioning of the Atlantic Economic Corridor”.

“Sligo Greenway” from Collooney to Bellaghy – conflicting requests

- Request for the provision of a greenway on the disused railway line from Collooney to Bellaghy (WRC), with extensions to Mayo, Galway and Enniskillen.
- The “planned Sligo Greenway” from Collooney to Bellaghy should be “wide enough to accommodate both Electric Rail and Greenway to operate side by side”.
- The current CDP objective to construct a greenway on the existing rail track “should be cancelled in view of the National Railway Strategy”.
- An alternative, “incremental greenway” should be constructed alongside the rail corridor, thus preserving the existing railway.

Support for the reopening of the Western Rail Corridor (WRC)

(Submissions 5, 11, 12, 19, 36, 37, 43, 47, 70, 75, 77, 87, 88, 89, 90)

- The Draft CDP should support the re-opening of the Western Rail Corridor by including an objective to reopen the railway from Collooney to Claremorris “as part of the wider Atlantic Railway Corridor”.
- The re-opened rail corridor between Sligo and Claremorris (Western Rail Corridor) would be able to connect all the rural communities and smaller towns not served by dual-carriageway roads.
- “In view of current Whole Ireland Rail Study” (i.e. the recently commenced All-Island Rail Review), the WRC should be extended from Sligo to Derry.
- The Draft Plan should support the reopening of the WRC, which is a link to Ireland West Airport (Knock) and would be “critical in attracting investment and job opportunities to County Sligo”.
- The Draft Plan should support the reopening of the WRC because it would increase the tourism potential of County Sligo.
- Support for the re-opening of the Collooney to Claremorris (WRC) railway line “so as to take the haulage that are currently on our roads which are proving dangerous”.

Chief Executive’s opinion

Local Transport Plan (LTP)

The preparation of a Local Transport Plan for the Sligo Regional Growth Centre Strategic Plan (RGC SP) area has already been recommended by the Chief Executive under CE-3.B.

It is expected that the preliminary surveys and consultation with stakeholders will clarify whether the optimal extent of this transport plan should be larger than the RGC SP area (which currently does not include Collooney and Grange). The areas of Carrowroe and Strandhill will clearly be included in the scope of the LTP.

The findings of the study and the recommendations of the LTP should be incorporated as policies and objectives of the Draft CDP and should be further detailed at settlement level, particularly in the forthcoming Sligo Town LAP.

Reduced motor traffic in Sligo Town, vehicular access and car parking

Traffic reduction measures, access for both destination traffic, through traffic, as well as the type, location/size of car parking areas in Sligo Town should be addressed in detail as part of the Sligo Town LAP, which will be subject to separate public consultation. The Draft CDP, however, should include appropriate policies ensuring the integration of land-use zoning and transport/traffic considerations at the earliest stage.

Active travel - cycling and walking

The number and variety of issues relating to cycling and walking reflect the increasing public interest for these modes of transport.

Section 8.3 **Cycle and pedestrian movements** of the current CDP contains no less than 18 policies and objectives supporting appropriate facilities for cyclists and pedestrians, largely covering the issues raised in submissions.

Additional narratives, policies and objectives should be included in the next CDP, in order to ensure compliance with the most up-to-date national guidance for active travel.

The Draft CDP should include an objective to prepare a *Cycling Strategy for Sligo Town and County*, which will provide a framework for the implementation of cycling infrastructure throughout Sligo.

Major transport infrastructure projects

The Chief Executive's recommendation CE-19.A indicates that the Transport / Sustainable Mobility section of the Draft CDP 2023-2029 needs to be reviewed to take account of the most recent updates to national policy and investment framework, such as the revised National Development Plan (October 2021).

The N-16 Lugatober Scheme, the N-17 Knock to Collooney Scheme and the Eastern Garavogue Bridge Scheme are at various stages of development, and their progression will continue to be included as objectives in the Draft CDP, along with objectives supporting the completion of other planned national and non-national projects.

The Chief Executive's recommendation CE-5.B has already specified that the Draft Plan should implement all RPOs which are relevant to road transport in County Sligo.

Public transport by rail and by air

The suggestions and recommendations are noted and agreed. Relevant policies are included in Sections 8.4 and 8.5 of the current Plan. These sections should be updated and the policies refined and brought in line with national and regional policy, as well as any other government documents that might be issued before the publication of the Draft CDP 2023-2029 (such as the concluding report of the All-Island Rail Review).

Sligo Greenway and the Western Rail Corridor

The competition between groups supporting the provision of "Sligo Greenway" and groups supporting the re-opening of the railway line on the existing rail track between Collooney and Bellaghy is an enduring phenomenon, for which a universally acceptable solution could not be provided in the current and previous development plans.

As a consequence, the current CDP supports both the provision of a greenway "on or alongside" the closed railway, and the "examination of feasibility" of re-opening the Western Rail Corridor.

Both the greenway and the railway can serve the local and regional economy in terms of attracting tourism, investment and new job opportunities to County Sligo.

One submission suggested that both projects should go ahead side by side. This might represent an ideal combination for those tourists interested in cycling only certain portions of the entire route, while using the train for transport between points of interest along the route.

It is expected that the All-Island Rail Review will finally provide clarity and adequate recommendations regarding the future of the (currently closed) railway line from Collooney to Bellaghy. The Draft CDP 2023-2029 will include policies and objectives in accordance with government decisions.

CE-32 – Chief Executive’s recommendations relating to transport and sustainable mobility

The following additional provisions should be considered when drafting the CDP 2023-2029:

- A.** Ensure that the Local Transport Plan that will be prepared in conjunction with the Draft CDP 2023-2029 examines the possibility of extending outside the Regional Growth Centre Strategic Plan area.

Any relevant recommendations of the LTP should be incorporated as policies and objectives of the Draft CDP and further detailed at settlement level, particularly in the forthcoming Sligo Town LAP
- B.** The Draft CDP 2023-2029 shall include appropriate narratives, policies and references to national guidance (e.g. the DMURS) to ensure that total amount of vehicular traffic is reduced in Sligo Town and other urban settlements, while retaining necessary access routes and parking facilities.
- C.** The Draft Plan’s section relating to Active Travel shall ensure that the policies and objectives of Section 8.3 Cycle and pedestrian movements of the current CDP are reviewed and refined in accordance with the suggestions received in pre-draft submissions.
- D.** The Draft CDP shall include an objective to prepare a *Cycling Strategy for Sligo Town and County*, which will provide a framework for the implementation of cycling infrastructure throughout Sligo.
- E.** Review and update national and regional road policies and objectives which support improvements to the road network, including upgrades and realignments.
- F.** The Airports and the Rail Transport sections of the Draft Plan shall reflect national/regional policy and any government recommendations arising from the All-Island Rail Review. The lands currently reserved as “public transport nodes” beside railways (active and closed) in various settlements shall be retained with the same or similar zoning in the Draft Plan.
- G.** The Draft Plan shall support the provision of greenways and shall contain appropriate narrative, policies and objectives on cycling and walking, including references to the role of greenways in promoting modal shift on commuter routes, in addition to their contribution to tourism development.

4.6 Submissions relating to climate action and renewable energy

(Submissions 8, 18, 19, 24, 30, 40, 41, 44, 47, 48, 61, 62, 63, 71, 74, 78, 89)

The issue of taking action to ensure adaptation to climate change was mentioned particularly in conjunction with “decarbonisation” or at least reduction in the use fossil fuels. The need for a local Climate Action Plan was also highlighted, as well as the need to support local communities in their efforts to reduce emissions and develop low-carbon projects.

The submissions that referred to the generation of energy from renewable sources (and associated infrastructure) have also justified their suggestions by referring to the requirements of national policy on climate actions. The two types of issues are closely related.

In contrast with the suggestions intended to support the production of energy, a number of submissions have indicated that some types of energy-related developments (including large consumers) should be restricted or even not allowed to proceed.

Climate action plan

- A Climate Action Plan should be prepared in parallel with the next CDP.
- The County Council should “incorporate the work of IT Sligo into the Climate Action Plan on projects to achieve Net Zero and the achievement of a climate-neutral economy by 2050”.
- The Draft CDP should define “key performance indicators” – particularly for greenhouse gas emissions.
- Any new “large-scale fossil fuel infrastructure projects” should be required to undertake “climate impact assessment” to ensure they are consistent with Ireland’s commitments in terms of the Paris agreement.

Decarbonisation and reduction of emissions

- The Draft CDP “should place greater responsibility on reducing carbon emissions so that decarbonisation is embedded in all aspects of the Plan”.
- The Draft Plan should require new developments to demonstrate sustainability in terms of “1. Reduction/efficiency, 2. Reuse/clean energy, 3. Recycle/smart energy”.
- The Draft Plan should support community-led, energy-efficiency projects and low-carbon generation projects, such as SEAI’s Sustainable Energy Communities (SEC) programme.
- The existing Decarbonisation Zone should be replicated throughout the county. At least one village or town should be supported to become a second Decarbonisation Zone in the county.
- Low-carbon communities should be developed in all urban areas across Sligo and measurable targets with specific timeframes for implementation”.

Energy – general considerations

- In connection with the desired “decarbonisation” meant to help adaptation to climate change, the County Council is requested to support, through its CDP, the generation of renewable energy from a variety of sources, using new technologies.
- The Draft Plan should outline “more ambition” for “energy transition” from 20th-Century technologies (e.g. wind farms) to new ones.

- The local authority should ensure “a proportionate contribution by the county” to the achievement of new national targets.
- The County Council should support the emerging “Northwest Energy Agency” [*this is likely the same as NECS - Northwest Energy Communities Start-up* - <https://www.itsligo.ie/research/strategic-research-centres/contract-research-unit/working-with-us/northwest-energy-communities-start-up-necs/>]
- The Draft CDP should encourage small-scale, alternative electricity generation from “wind, water and solar resources” and the development of “local and community micro-grids”.

Renewable Energy Strategy (RES) and Landscape Character Assessment

- The Draft Plan should be accompanied by a RES, including a map showing areas “suitable and unsuitable for the siting of wind turbines”. The RES should provide guidance on the size and scale and preferred locations of renewable energy installations, including wind, solar, battery, green gas, offshore, blue/green economy etc. A specific objective should be included, setting a target for renewable energy generation.
- The local authority should reconsider its Landscape Character Assessment (LCA) and identify landscape sensitivities in relation to renewable energy developments, such as 'Low', 'Medium', and 'High' sensitivity. All lands within the county should be assessed and classified in terms of renewable energy generation, defining areas of 'No-Go', areas 'Open to Consideration', and 'Preferred' areas.

Gas from “green” or renewable sources

- The Draft Plan should include a policy supporting “the extension of the natural gas pipeline to Sligo”. A short-term alternative may be available using Compressed Natural Gas (CNG).
- The Draft CDP and associated RES should recognize the potential for the use of green hydrogen and for the construction of biomethane plants in County Sligo.
- The Plan should support the provision of a local gas network in Sligo. Sligo SEC supports “the development of a Satellite Gas Network (‘virtual’ gas network extensions) in Sligo Town as enabling infrastructure for low-carbon, renewable gas sources from the surrounding region. This proposed local gas distribution network, connecting Sligo’s existing and future large energy users, will promote the development of biomethane production through anaerobic digestion in the North-West region. This network can also provide a market for the production of hydrogen from offshore wind sources.

Inland wind energy developments

- The Draft CDP should ensure the consistent implementation of the Wind Energy Development Guidelines and should be accompanied by a Wind Energy Strategy (WES).
- The Draft Plan should “allow for the adequate zoning of land for wind farms”, taking into account “neighbouring county zoning patterns”.
- Wind energy developments should be considered in upland areas which are part of Natura 2000 network “while balancing the need to protect the reasons for ecological designation”.
- SEAI’s Wind Atlas or any other wind data source should not be used as a constraint when identifying suitable areas for wind energy developments.
- Existing grid constraints should not be considered “hard constraints” when preparing the WES.

- New consents for wind energy developments should allow for 30-35 years operation at a minimum, so as not to unnecessarily limit the operation of the development.
- The Draft Plan should include a policy to “consider favourably the repowering and extension of existing windfarm developments where equipment is upgraded and/or replaced with the best available technology subject to development management standards and environmental considerations”.

Off-shore wind energy developments

- The Plan should include a policy supporting “the appropriate development of ocean and offshore wind energy production off the Sligo Coast by ensuring adequate provision of land-based infrastructure in line with national policy”.
- “Opportunities for shared Carbon Capture and Storage (CCS) and hydrogen infrastructure to decarbonise conventional generation, industry and transport should also be supported”.

Micro-generation

- The Draft Plan should “encourage” farmers to install solar panels on their sheds without requiring planning permission (i.e. as exempted development).
- The Draft CDP should facilitate the micro-generation of renewable energy on farms.

Proposed restrictions on energy-related developments

- Large wind power projects should be discouraged “as there is a surplus of wind-generated electricity produced in County Sligo”.
- The CDP should ensure “a rapid phasing out of all fossil fuels including gas across Sligo using all tools at the council’s disposal including the planning system”.
- The Draft CDP should not allow the expansion of the gas grid.
- The Draft Plan should “ban fracked gas in its energy mix”.
- New data centres in Sligo should be powered entirely by on-site or new off-site renewable energy. Existing data centres should be “required to transition rapidly to onsite or new off-site renewables”. Where technically possible, heat generated from a data centre should be utilised for district heating systems.

Chief Executive’s opinion

Climate Action Plan

The **Climate Action Plan 2021**, published by the government on 4 November 2021, provides a detailed plan for taking action to achieve a 51% reduction in overall greenhouse gas emissions by 2030 and setting Ireland on a path to reach net-zero emissions by no later than 2050, as committed to in the Programme for Government and set out in the Climate Act 2021.

The Plan lists the actions needed to deliver on climate targets and sets indicative ranges of emissions reductions for each sector of the economy. It will be updated annually, including in 2022, to ensure alignment with legally binding, economy-wide carbon budgets and sectoral ceilings.

The new Climate Action Plan 2021 suggests the manner in which most of the climate-related issues raised in submissions can be addressed.

Section 9.3.4 indicates that “Each local authority will prepare a Climate Action Plan at least once every five years, containing both mitigation and adaptation measures” and “Each local authority will develop a decarbonisation zone within its administrative area that will become the focus for a range of climate mitigation, adaptation and biodiversity measures”.

The preparation of a Climate Action Plan by Sligo County Council will be undertaken in consultation with stakeholders, including IT Sligo. The local Climate Action Plan is likely to include key performance indicators (KPIs) as set out in the national Climate Action Plan.

All relevant spatial or policy requirements arising from the forthcoming Local Authority’s Climate Action Plan will be incorporated in the new CDP 203-2029 either before its adoption or by means of a future variation.

Section 10.3.3 contains provisions relevant to spatial planning and policy. It indicates that the targeted reduction in carbon emissions should be achieved through:

- reduced travel distances between home, work and services, which will enable a greater proportion of journeys by bicycle or on foot (zero emissions);
- greater urban density, which will ensure more viable public transport leading to reduced transport emissions;
- higher-density residential development, which tends to comprise smaller units and, therefore, require less energy to heat – NPF targets require the proportion of apartments to treble, from 13% in 2019, to 39% by 2030;
- closer proximity of multi-storey and terraced buildings, which will require less energy and make renewables-based systems of energy distribution, such as district heating, or area-wide technology upgrades, more feasible.

The above measures can be incorporated in the relevant chapters/sections of the CDP 2023-2029 and subsequent LAPs, by means of policies, objectives and development management standards, as well as by ensuring proper integration between land-use and transport.

The Draft CDP 2023-2029 should also include policies supporting local communities in their efforts to decarbonise and develop energy-efficiency and energy generation projects, underpinned by government grant assistance and SEAI mentor age.

Energy generation from renewable sources

The requests for a Renewable Energy Strategy (RES) and a revised Landscape Character Assessment are noted. The Chief Executive has already recommended objectives for the preparation of a Renewable Energy Strategy, underpinned by an updated Landscape Character Assessment – refer to CE-6.B and CE-13.D.

The Energy section (11.1) of the current CDP and the development management standards in Sections 13.9.2 and 13.9.3 provide a framework to guide the development of renewable energy projects, in accordance with national legislation and planning guidance.

It is expected that the RES for County Sligo will address in detail the generation of energy from a variety of sustainable and renewable sources, from wind and solar to bio-gas and hydrogen. Pending the preparation of a RES, the Draft CDP 2023-2029 should include updated narratives, policies, objectives and development management standards in relation to energy generation and transmission.

It should be noted that it is not the role of the development plan to discourage wind energy projects, to ban any component of the County's energy mix, to prevent the expansion of the gas network or the construction of data centres. It is, however, the Plan's role to ensure that relevant policies are in accordance with national legislation and guidance, including the recently-published Climate Action Plan 2021.

Among the most important measures in the Climate Action Plan 2021 is to increase the proportion of renewable electricity to up to 80% by 2030, including an increased target of up to 5 Gigawatts of offshore wind energy. It is stated that "In addition to the upcoming microgeneration support scheme for householders the government will introduce a small-scale generator scheme for farmers, business, and communities to generate their own electricity and feed into the grid. As well as developing improved storage, we will also begin to deploy renewable gas such as biomethane and green hydrogen. The government will review its strategy on data centres to ensure that the sector will be in alignment with sectoral emissions ceilings and support renewable energy targets. [62%-81% reduction in emissions by 2030]".

CE-33 – Chief Executive's recommendations relating to climate action and renewable energy

The following additional provisions should be considered when drafting the CDP 2023-2029:

- A.** Ensure that the Draft CDP 2023-2029 incorporates the relevant measures and actions specified in the government's Climate Action Plan 2021 and forthcoming Local Authority Climate Action Plan, by appropriately integrating land-use and transport planning and by including relevant policies, objectives and development management standards in each CDP chapter.
- B.** The Draft CDP 2023-2029 shall support local communities in their efforts to decarbonise and develop sustainable energy projects, with a particular focus on enhancing the stock of climate-resistant, low-carbon and affordable housing.
- C.** Pending the preparation of a Renewable Energy Strategy, the Draft CDP 2023-2029 shall include updated narratives, policies, objectives and development management standards in relation to energy generation and transmission in accordance with the most up-to-date legislation, planning guidance and the provisions of the national Climate Action Plan 2021.

4.7 Submissions relating to the protection of natural and built heritage

(Submissions 15, 24, 28, 47, 50)

Natural heritage - biodiversity

- Development Plan policies should “protect farmland, our forests and high value natural habitats, such as wetlands, meadows, etc.”
- The Draft Plan should “incorporate nature in planning policy and decisions”.
- A “Tree Policy” should be included in the Draft CDP.
- The Plan should ensure that the protection of the Common Swift (*Apus Apus*) is integrated into planning considerations, both in regeneration and new build, by requiring the provision of built-in Swift nest boxes and the use of Swift bricks, to stop (and reverse) the decline of the species.

Landscape protection

- The Draft Plan should include measures to protect designated sites from coastal erosion and should not allow development to take place where coastal erosion is present.
- Buffer zones should be designated along rivers, covering their floodplains, to prevent inappropriate development and agricultural runoff.

Record of Protected Structures (RPS)

- Include Rathellen House (structure located in Finisklin, Sligo Town) in the Record of Protected Structures.
- Include the shopfront of McHughs Pub (structure located Grattan Street, Sligo Town) in the RPS.

Heritage grants

- Grants should be provided to farmers to restore traditional farm buildings.

Chief Executive’s opinion

Natural heritage – protecting biodiversity

Chapter 7 in the current CDP includes the Council’s policies on natural heritage (Section 7.1), architectural heritage (Section 7.3) and landscape character (Section 7.4).

There is a substantial body of policy designed to protect biodiversity and incorporate its consideration and enhancement in planning decisions.

In Section 7.1.2 Protected plant and animal species, policy P-PPAS-3 specifies that the Council will provide guidance in relation to the management of species protected by the law. All species of wild birds are fully protected by Irish legislation, including the common Swift (*Apus apus*), which is placed on the EU Amber List of birds.

The Planning Authority often attaches conditions requiring the protection of birds’ nests while carrying out permitted development. The Draft CDP 2023-2029 should include more information and development management standards designed to support the protection and regeneration of wild bird populations.

Landscape protection

Section 7.4 of the current CDP relates essentially to the protection of landscape character by preventing inappropriate development in areas of scenic quality. The majority of coastal zones and river/lake shores are designated as sensitive and visually vulnerable.

The existing landscape character assessment and protection policies should be reviewed and updated in advance or in conjunction with the preparation of a new Landscape Character Assessment for County Sligo, to ensure that new development does not impact significantly upon landscape character.

Record of Protected Structures (RPS)

The suggestion to include two structures on the RPS is noted and agreed.

McHughs Pub (1890-1930), a structure of architectural and social interest, is listed under Reg. No. 32007088 in the National Inventory of Architectural Heritage, and rated as being of regional importance.

The NIAH does not offer any information on Rathellen House, but this can be investigated locally.

Heritage grants

Funding for the conservation of heritage buildings is provided by the DHLGH through two schemes administered by Sligo County Council. This funding is outside the scope of the County Development Plan.

Applications are currently accepted (until 31 January 2022) under the Built Heritage Investment Scheme (BHIS) 2022 and the Historic Structures Fund (HSF) 2022. Additional information is available from the Council's website at

<https://www.sligococo.ie/Grants/FundingforConservationofHeritageBuildings/>

CE-34 – Chief Executive's recommendations relating to the protection of natural and built heritage

The following additional provisions should be considered when drafting the CDP 2023-2029:

- A. Ensure that the Draft CDP 2023-2029 incorporates more information and development management standards designed to support the protection and regeneration of wild bird populations, including the common Swift (*Apus apus*).
- B. The Draft CDP 2023-2029 shall include updated narrative, policies, objectives and development management standards ensuring the protection of County Sligo's landscape character from inappropriate development.
- C. Consider the proposal to include Rathellen House (structure located in Finisklin, Sligo Town) and the shopfront of McHughs Pub (structure located in Grattan Street, Sligo Town) on the County Sligo Record of Protected Structures.

Section 5

Required elements of the Core Strategy of the Draft CDP 2023-2029

5.1 Legislative provisions

In the Introduction (Section 1) to this report, it was indicated that a new Specific Planning Policy Requirement, **SPPR DPG2** (published in the Draft Development Plan Guidelines, 2021), demands that:

SPPR DPG 2

The Chief Executives stated recommendations on policies to be included in a development plan as part of a Report on Pre-Draft stage submissions, shall include a draft core strategy, consistent with Section 11(4)(d) of the Planning Act.

Section 11(4)(d) of the Planning and Development Act 2000 (as amended) indicates the following:

“Following the consideration of a report under *paragraph (c)*, the members of the planning authority or of the committee, as the case may be, may issue directions to the F81[**chief executive**] regarding the preparation of the draft development plan, F78[**and any such directions shall be strategic in nature, consistent with the draft core strategy, and shall take account of**] the statutory obligations of any local authority in the area and any relevant policies or objectives for the time being of the Government or of any Minister of the Government, and the F81 [**chief executive**] shall comply with any such directions”

It should be noted that Section 11 of the Act, which provides the legislative framework for the draft development plan, does not contain any section or paragraph requiring the preparation of a Draft Core Strategy in advance and independently of the Draft Development Plan.

The First Chief Executive’s Report (this report), as specified in Section 11(4)(b), must:

(i) list the persons or bodies who made submissions or observations under this section as well as any persons or bodies consulted by the authority,

F78 [(ii) summarise the issues raised in the submissions and during the consultations, where appropriate, but shall not refer to a submission relating to a request or proposal for zoning of particular land for any purpose.]

(iii) give the opinion of the F81 [**chief executive**] to the issues raised, taking account of the proper planning and sustainable development of the area, the statutory obligations of any local authority in the area, and any relevant policies or objectives for the time being of the Government or of any Minister of the Government, and

(iv) state the F81 [**chief executive’s recommendations**] on the policies to be included in the draft development plan.

The Chief Executive is therefore not legally required to prepare a Draft Core Strategy and include it in the Chief Executive’s Report on pre-draft submissions.

However, Section 11(4)(d) indicates that the members, after considering the CE Report, may issue directions that need to be “consistent with the draft core strategy”.

It would appear that the Draft Development Plan Guidelines (2021), through the SPPR DPG2, have proposed the inclusion of a Draft Core Strategy in the First Chief Executive's Report in order to facilitate the members in issuing strategic directions, consistent with the statutory obligations of the local authority and with government policy.

The following sub-section summarises the requirements of the Planning and Development Act 2000 (as amended) that are applicable to the Core Strategy of the County Development Plan 2023-2029.

5.2 Required elements of the Core Strategy of the new CDP

In accordance with Section 10(2A) of the Planning and Development Act 2000 (as amended), the Core Strategy of the CDP 2023-2029 must achieve the following:

1. Demonstrate the consistency of the housing strategy and the development plan with the National Planning Framework (NPF), with the NWRA Regional Spatial and Economic Strategy (RSES) and with the planning policy requirements specified in ministerial guidelines issues under Section 28 of the Planning Act;
2. Take account of any policies of the Minister (for DHLGH) regarding national and regional housing and population targets;
3. Provide details of areas already zoned for residential use or mixed-use that includes residential development, in hectares and housing unit numbers;
4. Provide details of existing zoned lands and areas proposed to be zoned for residential use or mixed-uses (which include residential development). For existing zoned, lands, such details must include the size in hectares and the number of houses proposed to be provided. For areas proposed to be zoned, details must be given to show how the proposals comply with national policy regarding phasing of development.
5. Demonstrate that in setting out retail objectives, the planning authority has had regard to the Retail Planning Guidelines issued under Section 28 of the Act.
6. Set out a settlement hierarchy that includes details of projected population growth of all towns, villages and rural areas, together with details of road and rail infrastructure.
7. The Settlement Hierarchy must indicate the NPF or RSES designations of any towns in the County – e.g. the “Regional Growth Centre” designation of Sligo Town.

Section 10(2B) of the Act specifies that the Core Strategy must be accompanied by a diagram or map (or other type of visual representation) illustrating the Settlement Hierarchy, the rural housing policy areas and the transport infrastructure of the County (national roads, relevant regional and local roads, inter-urban and commuter rail).

CE-35 - Chief Executive's recommendations regarding the requirements applicable to the Core Strategy of the Draft CDP 2023-2029

The Core Strategy of the Draft CDP 2023-2029 shall be:

- A. compliant with the provisions of the Planning and Development Act 2000 (as above);
- B. consistent with the national and regional policy objectives of the NPF and NWRA RSES;
- C. prepared in accordance with the methodologies detailed in the Draft Development Plan Guidelines (2021) or the final version of these Guidelines.

Section 6

List of persons and organisations that made pre-draft submissions or observations on the review of the County Development Plan

The Issues Paper designed to facilitate pre-draft consultation on the preparation of the Sligo County Development Plan 2023-2029 was published on the County Council’s consultation portal, at <https://consult.sligococo.ie/en/consultation/pre-draft-consultation-preparation-sligo-county-development-plan-2023-2029>

During the specified consultation period, from 30 July to 24 September 2021, 90 submissions were received.

Only 42 submissions were made directly through the consultation portal. A further 38 submissions were received by e-mail and 10 submissions were received by post. These 48 submissions were converted to a digital format and uploaded to the portal by Planning staff members.

The consultation portal automatically assigned numbers to submissions in chronological order of their upload, in the format “SLG-C9-XY” (meaning Sligo / Consultation no. 9 / Submission number XY). The submissions continue to be available for public viewing and inspection on the consultation portal, at <https://consult.sligococo.ie/en/node/99/submissions>

The table below lists the 90 submissions in chronological order, omitting the “SLG-C9” prefix.

The names of prescribed bodies are highlighted in blue type.

Submission number	Name of person or organisation
1	Office of Public Works (OPW)
2	Environmental Protection Agency (EPA)
3	Waste Policy and Resource Efficiency Division, Department of Environment, Climate and Communications (DECC)
4	Fisheries Division, Department of Agriculture, Fisheries and the Marine (DAFM)
5	Sligo Greenway Co-Op
6	Geological Survey Ireland (GSI), Department of Environment, Climate and Communications (DECC)
7	Department of Transport (DoT)
8	IT Sligo

Submission number	Name of person or organisation
9	Transport Infrastructure Ireland (TII)
10	Carraroe and District Regeneration Association (CADRA)
11	Alice McGowan
12	David McGowan
13	Carraroe and District Regeneration Association (CADRA)
14	Carraroe and District Regeneration Association (CADRA)
15	David McLoughlin
16	National Transport Authority
17	Inland Fisheries Ireland (IFI)
18	Coillte
19	Sligo Chamber of Commerce and Industry
20	MKO (Consultants) on behalf of Sligo Chamber of Commerce and Industry
21	MKO (Consultants) on behalf of Michael McGoldrick
22	MKO (Consultants) on behalf of Michael McGoldrick
23	Paul Maguire
24	The Intergenerational Strategists
25	Lucy Hayes
26	Wesley Kelly
27	Sligo Cycling Campaign
28	Gary Gill
29	Jonathan Kelly
30	Gavin Forkan
31	Michelle Howley
32	Brian Kelly
33	An Post
34	Arts Council
35	Aonghus Murphy
36	Ireland West Airport, Knock (IWAK)

Submission number	Name of person or organisation
37	Niall O'Dowd
38	John Monahan
39	Irish Water (IW)
40	Sligo Sustainable Energy Community (Sligo SEC)
41	RWE Ireland
42	Department of Education (DoEd)
43	Michael O'Dowd
44	Greensource
45	Strandhill Community Development Association
46	Development Applications Unit (DAU), Department of Housing, Local Government and Heritage (DHLGH)
47	Irish Creamery Milk Suppliers Association (ICMSA)
48	IT Sligo Contract Research Unit
49	Orla Howley
50	Melinda Swan
51	Valerie Kivlehan
52	Francis Kivlehan
53	Colleen O'Hara
54	Francine Kivlehan
55	Grace Kivlehan
56	Brock McClure (Consultants) on behalf of Musgraves Operating Partners Ireland
57	Northern and Western Regional Assembly (NWRA)
58	Fáilte Ireland
59	Sligo Greenway Co-op
60	The Heritage Council on behalf of Sligo Collaborative Town Centre Health Check (Sligo CTCHC)
61	Sligo Irish Farmers' Association (IFA)
62	Wind Energy Ireland
63	Not Here Not Anywhere (NHNA)

Submission number	Name of person or organisation
64	EirGrid
65	Michael Howley
66	Marc Mac Sharry
67	Una Fallon
68	Ann Spellman and Aonghus Murphy
69	Marie Kelly
70	Helen Rochford Brennan
71	Renewable Energy Systems Limited (RES)
72	Pamela Kivlehan
73	Age Friendly Sligo
74	SSE
75	Peter Bowen Walsh on behalf of West=On=Track
76	Office of the Planning Regulator (OPR)
77	Cyril Feehily
78	Patricia Gardiner
79	Patricia Harris
80	Patrick Gaughan
81	Rathcormac Sewerage Scheme Committee
82	Eunan Friel
83	Imelda Kivlehan
84	Connie Crawford
85	Dolores Kivlehan
86	John Kivlehan
87	Gerry Powell
88	Mary and Noel Henry
89	John Gallagher
90	Kieran Mullaney

Appendix

Organisations notified of the CDP review

Among the organisations notified of the review and invited to make pre-draft submissions in relation to Sligo County Development Plan 2023-2029, there are prescribed bodies (including government departments and state agencies), adjoining county councils and local agencies.

- An Bord Pleanála
- An Taisce
- Arts Council/ An Chomairle Ealaíon
- Department of Agriculture, Food & Marine
- Department of Defence
- Department of Education
- Department of Enterprise, Trade and Employment
- Department of Environment, Climate and Communications
- Department of Housing, Local Government & Heritage
- Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media
- Department of Transport
- Dublin Airport Authority
- EirGrid
- Environmental Protection Agency
- ESB
- Failte Ireland
- Health and Safety Authority
- Health Service Executive
- Heritage Council
- IDA Ireland
- Inland Fisheries Ireland
- Irish Water
- Leitrim County Council
- Local Community Development Committee
- Mayo County Council
- National Roads Authority
- Northern and Western Regional Assembly
- Office of Public Works
- Office of the Planning Regulator
- Roscommon County Council
- Sligo LEADER
- Sligo Local Enterprise Office
- Sligo Public Participation Network (PPN)
- Transport Infrastructure Ireland (TII)

In addition to the organisations listed above, a substantial number of infrastructure and service providers were also notified of the pre-draft consultation relating to the CDP review and preparation of a new development plan.