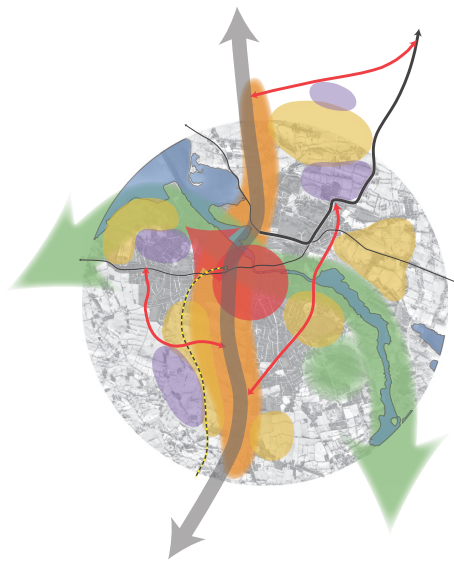


Third Manager's Report

**on submissions and observations
relating to the Proposed Amendments
to the Draft SEDP 2010-2016**



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1. Introduction

The Proposed Amendments to the Draft *Sligo and Environs Development Plan 2010-2016* (SEDP) were on public display from 19 August to 16 September 2009 (both days inclusive).

The Proposed Amendments included 137 material changes to the Draft SEDP, Draft North Fringe Local Area Plan, Draft Quay Quarter Urban Design Framework, Draft Record of Protected Structures and 5 changes to the Environmental Report.

During this public consultation period, Sligo County Council and Sligo Borough Council received 74 submissions and observations on the Proposed Amendments, of which 2 related to protected structures. Six submissions were received after the deadline.

In addition to this, it should be noted that seven submissions on the Draft SEDP were received after 22 April 2009. The submissions that were late at the previous stage of consultation were not considered in the Second Manager's Report, but are addressed in the Third Manager's Report (this report).

The **Third Manager's Report** summarises the issues raised in the submissions and gives the Manager's response to these issues, including recommendations as to whether or not the Proposed Amendments to the Draft Plan or Draft RPS should be adopted.

How the Manager's Report is organised

On receipt, each submission was allocated an official reference number. The reference numbers relating to each individual submission are shown in the list of submissions in Section 5 of this Report. There is no separate list of submissions on the Proposed Amendments to Draft RPS.

Submissions opposing the Proposed Amendment no. 24 (modifying provisions regarding O'Connell Street) – 60 in total, signed by circa 2,850 persons – are addressed collectively. The two submissions supporting the Proposed Amendment no. 24 – one of them signed by approximately 100 persons – are addressed individually, as are the remainder of submissions, in Section 2 of this Report.

Section 3 contains the Manager's response to late submissions on the Draft SEDP. No material changes are recommended on foot of these submissions, although a number of clarifications are considered necessary.

Furthermore, the Manager has made several supplementary recommendations. These are included in Section 4 of this Report.

The role of the elected members

Deciding whether to adopt, to reject or to make minor modifications to the Proposed Amendments to the Draft Plan is a function reserved for the elected members of Sligo County Council and Sligo Borough Council.

Having considered the Proposed Amendments and the Manager's recommendations on the issues raised, the Members should adopt the Development Plan.

The new SEDP 2010-2016 should be adopted at least four weeks before the current SEDP 2004-2010 expires. The last date for adoption of the new Plan is 9 November 2009.

At this stage, the members are required to consider the Proposed Amendments and the Manager's recommendations contained in this Report. According to Section 12 (10)(a) of the Planning and Development Act 2000 (as amended),

"The members of the authority shall, by resolution, having considered the amendment and the manager's report, make the plan with or without the proposed amendment, except that where they decide to accept the amendment they may do so subject to any modifications to the amendment as they consider appropriate."

Furthermore,

"In making the development plan ... the members shall be restricted to considering the proper planning and sustainable development of the area to which the development plan relates, the statutory obligations of any local authority in the area and any relevant policies or objectives for the time being of the Government or any minister of the Government." (S. 12 (11))

What happens next

Once the Planning Authorities have made the development plan, they have to notify the public, the Minister, the prescribed authorities, adjoining planning authorities, An Bord Pleanala and the County Development Board. A copy of the development plan must be made available for inspection at stated places.

The development plan comes into effect four weeks from the day that it is made.

However, according to Section 31(2) of the Planning and Development Act:

"Where the Minister considers that any development plan fails to set out a overall strategy for the proper planning and sustainable development of the area of the authority or otherwise significantly fails to comply with this Act, the Minister may, for stated reasons, direct the authority to take such specified measures, as he or she may require to review or vary the development plan to ensure compliance with this Act and the authority shall comply with any such direction."

2. Summary of recommendations

The Manager recommends that the Proposed Amendments be adopted with the following exceptions:

A. Amendments that should not be adopted

- No. 3.** The sentence “It is recognised that these constraints exist in Sligo” should be retained in Section 6.5.6. of the Draft SEDP.
- No. 11.** The objective O-CF-1 to reserve a site at Carrowroe for the construction of a private hospital and ancillary facilities should not be adopted.
- No. 19.** The proposed **Addendum** to Section **10.2.7 Objective T1.5.a Wester/City Bypass** should not be included in the Draft SEDP. The entire Section 10.2.7 should be deleted.
- No. 20.** The text of objective T2.11 should be retained – (MSR)
- No. 48.** The water supply objective O-WS-4 should not preempt national policy regarding water pricing. The objective should be deleted in its entirety.
- No. 71.** The zoning of the Shafin site at Orchard Road should not be changed from R3 to R2.
- No. 74.** The zoning of the entire site at Drumaskibbole belonging to Declan O’Conor should revert to BUF/buffer zone.
- No. 76.** Zoning at Carrowroe should not be changed to CF/community facilities to allow for the construction of a private hospital and ancillary facilities.
- No. 82.** The zoning of the site at Rathbraughan Line belonging to Dick Chambers should remain OS/open space.
- No. 86.** The line of objective T1.5 at Carrowroe and Oakfield should be retained.
- No. 87.** The line of objective T2.11 should be retained on Map 2 Transport objectives.
- No. 91.** No objective O-CF-1 to reserve a site at Carrowroe for the construction of a private hospital and ancillary facilities should be indicated on Map 4 General objectives.
- No. 125.** Ozanam House (Draft RPS item no. 96) should be protected in its entirety, not “façade-only”

B. Amendments that should be modified

- No. 5.** The retail policy P-RP-13 should allow a maximum of 30% of the net floor space of any individual warehousing unit to be used for the sale of comparison goods ancillary/related to the main bulky products.
- No. 24.** The text of Section **10.4 A Pedestrian-friendly city centre** should be retained unchanged, as originally included in the Draft SEDP, except for objectives O-PED-1 and O-PED-2, which should be modified to remove conditionality.
- No. 63.** The title and text of Section 16.8 should be modified to reflect the fact that certain development management requirements relating to access would apply to the entire roads network and not only to national roads.
- No. 135** The building at No. 17 High Street should be retained on the RPS while including the proper photographic record and corrected description.

In addition to recommendations arising from submissions, the Manager has made **six supplementary recommendations**, which include necessary clarifications and updates to the text of the Draft SEDP.

3. Response to submissions on the Proposed Amendments

Submission no. 1-6, 8-15, 17-19, 21-22, 24-27, 29-30, 32-39, 41-44, 46, 48-57, 59, 64-65, 67-74 August-September 2009

(and late submissions no. L1 to L5)

Sligo residents, traders and other interested parties/individuals

SBC

The issue

These 60 submissions support the current pedestrianisation of O’Connell Street, and oppose the opening of the street to vehicular traffic as potentially enabled by the Proposed Amendment no. 24, which modifies the text and objectives contained in Section 10.4 of the Draft SEDP.

It should be noted that three of the 60 submissions include petitions combining approximately 2,850 signatures in favour of the existing state of of O’Connell Street.

The submissions put forward a wide variety of reasons which support this point of view. In summary, the arguments opposing the reopening of the street to vehicular traffic are as follows:

- it would be a retrograde step for the future development of the city;
- it would not favour economic and cultural growth;
- it would diminish the trade of existing businesses and lead to increased unemployment;
- it would negatively affect the vibrancy and social life of the city centre;
- it would not be conducive to tourism promotion;
- it would damage the city centre retail experience;
- there would be negative impacts on the “evening economy” and established “café culture”;
- there would be no significant improvement in journey times;
- there would be traffic hazard concerns for cyclists and pedestrians;
- it is necessary to promote more sustainable transport models;
- the Eastern Bridge crossing would be a more appropriate traffic solution;
- the works necessary before reopening would be costly;
- the pedestrianised street is as an attractive public space that should be retained;
- there is a need to retain this pedestrian link with other parts of the city;
- re-pedestrianisation will happen in the future anyway;
- reopening the street to cars would be against the wishes of the majority of the public.

Opinion

Background information

The opening in September 2005 of the N4 Sligo Inner Relief Road has removed approximately 25,000 vehicles per day from city centre streets. This allowed for the closure of O’Connell Street to through traffic, for traffic calming within the city centre and for the introduction of pedestrian-priority and shared-priority streets. This was done in accordance with objective T10.1 of the current SEDP 2004-2010 which stated: *“Following completion of the Inner Relief Road, pedestrianise O’Connell Street, Castle Street, Grattan Street and Market Street.”*

Consistent with this traffic management approach, the Draft Plan 2010-2016 included an objective (O-PED-1) to “*continue the pedestrian prioritization and environmental improvements of the City Centre to include O’Connell Street, Castle Street, Grattan Street, Market Street, High Street and John Street*”.

The Draft Plan was put on public display from 9 February to the 22 April 2009. While a total of 172 submissions were received on the Draft Plan, there were only two submissions which were negative in relation to objective O-PED-1 and in particular the continued pedestrianisation of O’Connell Street.

The Second Manager’s Report on submissions and observations relating to the Draft Plan disagreed with these dissenting submissions on grounds of traffic management, commercial attractiveness and tourist appeal. Accordingly, the report did not recommend any change to the Draft Plan in this regard.

However, at their special meeting of 20-21 July 2009, the members of Sligo Borough Council resolved replace Section 10.4 of the Draft Plan with a shorter, reworded version, which resulted in the Proposed Amendment no. 24.

Effects of the Proposed Amendment no. 24

The proposed rewording of **Section 10.4 A pedestrian-friendly city centre** effectively negates the stated aim to promote greater pedestrian activity and discourage vehicular traffic throughout the entire city centre, not just in O’Connell Street.

It deletes all references to a possible pedestrian-priority area – between Wine Street, Stephen Street, Bridge Street, Teeling Street, Temple Street and Adelaide Street – surrounded by an inner ring-route allowing vehicular access to the edge-of-centre car parks. Thus it preempts the potential future traffic calming or even pedestrianisation of Castle Street, Grattan Street, John Street, Market Street and High Street.

Newly-introduced text outlines that future pedestrianisation of streets in Sligo City shall take place only “when viable alternative routes for vehicular traffic, which are acceptable to the elected Council, have been put in place”, disregarding the fact that a generally-accepted traffic system is already in place.

The proposed amendment also introduces a new objective O-PED-1 worded as if O’Connell Street was currently open to vehicular traffic, and conditions the pedestrianisation of the street on government funding and the Borough Council’s decision. The newly-proposed objective O-PED-1 essentially indicates that O’Connell Street will be pedestrianised at some unspecified time in the future.

Given that O’Connell Street is currently pedestrianised, there are concerns that this is not a valid objective, as it proposes to do something that has already been achieved. Notwithstanding this wording issue, there are serious concerns with regard to any such proposal to reopen the street to vehicular traffic.

The main effect of the Proposed Amendments would be the possibility of O’Connell Street being reopened to vehicular traffic when the SEDP 2010-2016 comes into force. This reopening has actually already been agreed through a Sligo Borough Council resolution. As made clear by the submissions received, there is overwhelming public opposition to such move for a variety of reasons summarised above.

Considerations

It is considered that the Proposed Amendment no. 24 is not in keeping with the vision for Sligo as a compact, liveable, accessible city (see Section 4.3 of the SEDP) and severely undermines the

evolution of Sligo's city centre, one of the core elements of the urban development strategy outlined in Section 5.2 City Form.

The opening of O'Connell Street to traffic would be contrary to the Department of Transport's Smarter Travel Policy, which has specific policy objectives to reduce vehicular traffic in town centres, and encourage more sustainable means of transport including walking, cycling and public transport. The opening of O'Connell Street to traffic would increase traffic congestion on the surrounding road network including Grattan Street, Market Street, High Street, Castle Street, Bridge Street, Thomas Street and Stephen Street, thus creating a traffic-focused city centre, with knock-on negative impacts on pedestrians and cyclists.

It is acknowledged that funding for O'Connell Street environmental enhancement works is not currently available. However, it is considered that reopening the street to vehicular traffic would be a retrograde step in the development of Sligo as a Gateway City.

Furthermore, the reopening of the street to vehicular traffic would be inconsistent with many of the other strategic aims, policies and objectives contained in the Draft Plan. Examples include the following:

BA-4 Increasing mobility sustainably

- b. Support effective and sustainable public transport through the provision of a quality bus and rail service with adequate park-and-ride facilities, alongside the promotion of cycle and pedestrian links.

General retail planning objectives

- O-RP-6** Seek to refurbish the pedestrianised O'Connell Street to provide a pedestrian friendly space.

Mobility – strategic policies

- SP-MOB-7** Protect the historic city centre from the impact of traffic congestion.

Policies for city centre traffic management

- P-CC-TM-1** Discourage through traffic from penetrating the city centre, by adopting a circulatory system that directs traffic around the centre on a "ring route", providing multi-storey car parks on the edge of the centre.
- P-CC-TM-2** Pedestrianise or improve the pedestrian environment and give cycling priority to streets within the centre, restricting on-street car parking and undertaking environmental enhancements.

Strategic policies for urban design

- SP-UD-1** Create a coherent urban structure, making the city more legible and pedestrian-friendly.

Commercial Core urban design objective

- O-CC-CC-1** Carry out environmental enhancement works to O'Connell Street, including the refurbishment of the pavement and the installation of new street furniture.

Public realm policies

- P-CC-PR-1** Promote the development of a pedestrian-friendly city centre through a programme of pedestrianisation, pavement widening and traffic calming.

At the same time, an objective to pedestrianise and environmentally improve O'Connell Street would be positive for the SEDP. This particular objective should not be singularly conditioned by access to funding, as the majority of development plan objectives are subject to availability of resources. This conditionality creates uncertainty and indicates a lack of decisiveness.

Given the uncertainty and unpredictability in relation to the pedestrianisation of O’Connell Street, it will be very difficult to prioritise the seeking of funds for its enhancement. Priority would be given to projects with a much greater degree of certainty and less ambiguity.

While the narrative of Section 10.4 should remain unchanged, as it was originally proposed in the Draft SEDP, it is recommended that the newly-proposed objective O-PED-1 should be modified by eliminating the references to funding and to Borough Council resolution. The conditionality should also be removed from objective O-PED-2.

Recommendation

The Proposed Amendment no. 24 should be modified as follows:

A. The proposed changes to the narrative of Section 10.4 should not be made.

B. Objective O-PED-1 should be changed to read (new text in green):

O-PED-1 Pedestrianise and environmentally enhance O’Connell Street when the necessary funding to cover the costs of the pedestrianisation and enhancement of the street is provided by Government or other sources, and when the Borough Council by resolution deems it appropriate.

C. Objective O-PED-2 should be changed to read:

O-PED-2 Continue the pedestrian prioritisation and environmental improvements of the City Centre to include ~~O’Connell Street~~, Castle Street, Grattan Street, Market Street, High Street and John Street, ~~when funding becomes available and when the Borough Council by resolution deems it appropriate.~~

Submission no. 7

Deirdre O’Rourke

22 August 2009

SBC

Issue no. 1

D. O’Rourke refers to the Proposed Amendment no. 3, which deletes the last sentence of the second paragraph in Section 6.5.6 as follows:

Large food stores should be located in the city centre or on the edge of the centre. However, an out-of-centre location may be considered where it has been demonstrated that it is not possible to bring forward sites which are in or on the edge of the city centre, because of the site size requirements of large food stores, urban design constraints or because the road network does not have capacity for additional traffic and service vehicles. ~~It is recognised that these constraints exist in Sligo.~~

D. O’Rourke states her opposition to “the above Section”, without specifying whether she opposes the entire contents of Section 6.5.6 or only the Proposed Amendment no. 3. She also states her support for out-of-centre food stores.

Issue no. 2

The submission opposes the pedestrianisation of O’Connell Street, and supports the opening of the street to vehicular traffic.

D. O'Rourke contends that pedestrianisation results in a decrease in business activity and raises problems with regard to access and car-parking near the city centre. It states that there are other options for pedestrian areas in the town.

Opinion

1. Presumably, the submission opposes the requirement for large food stores to be located in the city centre or edge-of-centre areas, since it supports "out-of-centre food stores". It should be noted that the Proposed Amendment no. 3 does not seek to alter the requirements of Section 6.5.6, which makes provision for out-of-centre locations for food stores in specific circumstances. The removal of the last sentence, as proposed, does not alter this provision. The sentence is a statement of fact and should be retained. Please refer also to the Manager's response to Issue no. 3 of Submission no. 63.

2. Please refer to the Manager's opinion on the Proposed Amendment no. 24 (p. x of this Report).

Furthermore it is considered that the issue of access and car-parking in the city centre is adequately addressed through city-centre traffic management policies which encourage the adoption of a circulatory system that directs traffic around the centre on a "ring route", providing multi-storey car parks on the edge of the centre.

Recommendations

- A. The Proposed Amendment no. 3 should not be adopted.
- B. The Proposed Amendment no. 24 should not be adopted.

Submission no. 16

9 September 2009

Imelda Condon, Higher Executive Officer
Management Services Unit, Department of Transport

SBC/SCC

Issue no. 1

The Department of Transport indicates that the Government has accepted the recommendations of a report on public safety zones in the vicinity of Cork, Dublin and Shannon airports, and arrangements to give effect to these zones are under consideration.

Opinion

The information is noted. However, this submission does not relate to any of the proposed amendments. Any future requirements regarding possible safety zones at the Regional Airport in Strandhill will be assessed for potential impacts on the SEDP area.

Recommendation

No action to be taken on foot of this submission.

Submission no. 20

14 September 2009

Cliona Corry, Murray O'Laoire Architects
on behalf of Mangan Bros

SBC

Issue no. 1

The consultants refer to a submission previously made on the draft SEDP - Submission 110, which requested that a small piece of land adjacent to a Mangan Bros Holding site be rezoned from OS/open space to NC/neighbourhood centr.

The consultants ask whether an “administrative error” has occurred, as the requested rezoning was not included among the proposed amendments to the Draft SEDP, despite the Manager’s positive recommendation.

Opinion

The Manager’s recommendation in relation to submission 110 was not agreed by the members of Sligo Borough Council, who did not propose any amendments in relation to the lands adjacent to Mangan Bros Holding (MBH) site.

Recommendations

No action to be taken on foot of this submission.

Submission no. 23

14 September 2009

Eugene Gillespie and Paul Jennings
RPS Item No. 80

SBC

Issue no. 1

The submission states that the structures at no. 16 and no. 17 High Street share a common roof, which is a very rare example (one of five) in the country of a “butt purlin” trussed roof structure. The submission contends that Duchas/The Heritage Council has dated the “common structure” at no. 16/17 to 1640, and as such, it is an historical monument that should be protected.

Opinion

No. 16 High Street was incorrectly identified as No. 17 High Street on both the NIAH and the Draft RPS (a photograph of No.16 was shown on the web site and it was described as no.17). The building had been included twice in the Draft RPS, once as No.16 and once as No.17 High Street (RPS No. 79 and 80 respectively).

No. 16 High Street has been given a *regional* rating in the National Inventory of Architectural Heritage (NIAH) with a special architectural and social Interest.

No. 17 High Street has not been given any rating in the NIAH, despite the identification of No. 16 as No. 17. This is clear from both the photographic evidence on the NIAH and the map evidence.

A site inspection took place on 14 October 2009. Following this site inspection, it is clear that No.16 and No. 17 were originally constructed as one building. They share a common roof structure and were sub-divided at a later stage, possibly in the mid-19th Century. On this basis, given the recommendation to include No. 16 on the RPS partly on the basis of the roof structure, it is considered that No. 17 should also be included, as the two units are originally one building.

The current RPS item no. 80 should show the correct photograph of No. 17 High Street and should read “terraced two-bay, two-storey rendered property, formerly a single property together with No. 16 High Street”.

Recommendation

The Proposed Amendment no. 135 should be modified to retain the structure at No. 17 High Street on the RPS while including the correct photographic record and changing the description to read “terraced two-bay, two storey rendered property, formerly a single property together with No. 16 High Street”.

Submission no. 28

15 September 2009

Jim O’Sullivan

SCC

Issue no. 1

The submission refers to the Proposed Amendment no. 11 and the intention to rezone lands at Carrowroe to facilitate the construction of a private hospital. J. O’Sullivan asks the Council to ascertain that such a proposal would be in the interests of the common good and would satisfy guidelines and best practice regarding planning and development.

It is argued that there is no justification/proof of the need for such a facility.

The submission outlines the importance of site selection to ensure services are delivered in an optimum way. The submission contends that the site fails to meet various requirements and standards, including access requirements, and would be contrary to the Council’s own SEDP policies in regard to the provision of health services and care facilities.

It is stated that to permit a private hospital would allow Government to resist representations for further investment and development of SGH which has had services withdrawn in recent times. It is considered that the healthcare requirements of the community should be delivered by SGH

The submission concludes that a better approach would be to defer a decision on the rezoning of lands until a full and thorough report with a professional assessment regarding the need for a private hospital is carried out. This would also be in line with the comments from the Minister for Environment, Heritage and Local Government in regard to rezoning of lands where there is already sufficient zoned lands.

Opinion

The subject lands are located outside the development limit of the Draft SEDP and are included in the buffer zone whose function is to contain and consolidate the city while safeguarding land for its future expansion and the provision of strategic infrastructure. It is considered inappropriate to zone lands at this location for community facilities. The existing draft SEDP already provides adequately for the accommodation of such facilities on sites that are more easily accessible, closer to existing residential areas and other community facilities.

Section 8.3 of the Draft SEDP sets out policies seeking to integrate health services and facilities with new and existing community facilities, and promoting the location of such facilities on sites that are convenient for pedestrian access and public transport.

Furthermore, the NRA opposes the Proposed Amendment no. 76 – regarding the zoning of the site of the objective introduced under the Proposed Amendment No. 11 – as its potential access onto the N4 dual carriageway is contrary to NRA’s policy on development management and access to national roads. This view is fully shared by the Transportation Section of the County Council.

The Proposed Amendments no. 11, no. 76 and no. 91 should therefore not be incorporated into the final SEDP.

Recommendation

The Proposed Amendments no. 11, no. 76 and no. 91 should not be adopted.

Submission no. 31

15 September 2009

Mark Whittaker, McCarthy Keville O’Sullivan
on behalf of Shafin Developments

SBC

Issue no. 1

The submission refers to the Proposed Amendment no. 71 relating to lands on Orchard Road. The Amendment seeks to alter the zoning from R3 to R2. The submission requests that the Amendment is not agreed and that the subject site remains zoned for R3 as per the draft Development Plan.

The submission outlines the planning history on site and indicates that given the proximity of the site to Sligo City Centre and the type and nature of development in the immediate vicinity, the lowering of the zoning is contrary to the proper planning and sustainable development of the area.

Opinion

As previously indicated in the Second Manager’s Report, the site is located close to the city centre, to surrounding employment areas, and is well served by existing/planned infrastructure. It is the policy of the SEDP to encourage higher-density development at such locations, in the interests of sustainable development and the economic provision of services and infrastructure.

It is considered that, due to the site’s location, low-medium density would not be in keeping with the *Residential Density Guidelines for Planning Authorities* (1999), which recommend increased residential densities in appropriate locations, including city and larger town centres.

The above recommendations are maintained and strengthened in the *Sustainable Residential Development in Urban Areas* (May 2009) guidelines for planning authorities.

The zoning of the subject site should remain R3.

Recommendation

The Proposed Amendment no. 71 should not be adopted.

Submission no. 40

16 September 2009

John Comiskey

SBC

Issue no. 1

J. Comiskey states that the pedestrianisation of O'Connell Street has actually improved the journey time by car to his place of work (IT Sligo). He considers that reopening this street will result in yet another difficult junction to exit from at the post office end.

In order to facilitate the access of residents of the East Ward to the Institute of Technology, Hospital and Fás, it is suggested that traffic flow should be reversed in Thomas Street/Bridge Street, which would eliminate the need for vehicular traffic from the East Ward to proceed south in order to go north.

Opinion

Any change to the traffic flow has knock-on implications on a wider area and needs to be examined as part of a wider study. The reversal of the flow of traffic in Thomas Street / Bridge Street and its potential effects can be explored as part of any traffic study being undertaken. However, it would not be appropriate to include a specific objective in this regard in SEDP.

The Transportation Section of the Borough Council agrees that there would be negative traffic impacts arising from the reopening of O'Connell Street to vehicles. The Proposed Amendment no. 24, which would allow the reopening of the street to vehicular traffic, should not be adopted.

Please also refer to the Manager's opinion on submissions relating to the Proposed Amendment no. 24 (p. 3 of this Report).

Recommendation

The Proposed Amendment no. 24 should not be adopted.

Submission no. 45

16 September 2009

John Spain Associates

on behalf of Aldi Stores (Ireland) Ltd.

SBC

Issue no. 1

The submission refers to the site owned by Aldi at Pearse Road, where the company intends to develop a discount food store.

It is requested that the Proposed Amendment no. 62 (relating to neighbourhood centres and the circumstances in which discount food stores would be permitted to locate therein) be modified by inserting the words "notwithstanding the" instead of "subject to" as follows:

Discount food stores may be permitted to locate in neighbourhood centres, ~~subject to~~ **notwithstanding the** relevant floor space restrictions, in the following circumstances....

- a. it can be proven that there would be no negative impact upon the vitality and viability of the city centre or upon the amenity of the city or of the neighbourhood centre and surrounding area;
- b. the development proposal is supported by a masterplan covering the entire area of the neighbourhood centre. The masterplan should be based on sound urban design principles, should demonstrate appropriate layout and design of buildings as well as integration of the discount food

store and the other proposed/potential structures/uses, ensuring that the emerging neighbourhood centre will not appear to be “mono-use” or be visually dominated by a single-use retail structure or a car parking area.

- c. there is adequate accessibility by different modes of transport, including for pedestrians.

Opinion

The site at Pearse Road, owned by Aldi, is part of the designated Cornageeha Neighbourhood Centre, which falls into the NC-1 category. Within this category of neighbourhood centres, the total net retail floor space permissible is 1,500 sq.m., with an upper limit of 250 sq.m. for individual retail units. It should be noted that in each of the four neighbourhood centres of the NC-2 and NC-3 categories, it is possible to provide two larger-scale convenience stores with a combined net floor space of up to 1,750 sq.m. Discount food stores can be considered at these locations subject to the floor space restrictions and the design requirements outlined in the Proposed Amendment no. 62.

A potential effect of the requested modification would be the exemption of discount food stores from the application of individual unit floor space limit in NC-1 neighbourhood centres.

Such exemption could lead to a situation where the entire allocation of net floor space in a neighbourhood centre of the NC-1 category would be used up by a discount food store, thereby excluding the development of other types of shops.

This would be contrary to the provisions of Section 6.5.7, which encourages the provision of various retail outlets such as newsagents, pharmacies, laundry facilities, hairdressers etc. in addition to convenience/food stores.

It is considered that the requested modification should not be accepted.

Recommendation

The Proposed Amendment no. 62 should not be modified as requested in this submission.

Submission no. 47

16 September 2009

Theresa Halloran on behalf of the
Development Applications Unit, DoEHLG

SBC

This submission recommends that structures are not removed from the Draft RPS unless they have lost the category or categories of special interest which caused them to be included in the first instance.

Opinion

For every proposed deletion of a regionally-rated building, a justification for so doing was given in the Second Manager’s Report (July 2009), except in the case of the Proposed Amendment no. 125, which was introduced by the Borough Council members without reasons being indicated.

The Proposed Amendment No. 125 in relation to Draft RPS item no. 96 (Ozanam House) specifies protection of the “façade only” in the RPS 2010-2016.

Recommendation

The Proposed Amendment no. 125 should not be adopted. It is recommended that this building be protected in its entirety and included on the Sligo and Environs Record of Protected Structures 2010-16.

Submission no. 58

16 September 2009

Michael Egan, Head of Corporate Affairs
National Roads Authority (NRA)

SBC/SCC

Issue no. 1

The NRA welcomes the inclusion of the Proposed Amendment no. 1 and also supports the Proposed Amendments no. 13 and 63.

In regard to the proposed/planned road improvements, the NRA notes the Proposed Amendments no. 16, 17, 18 and 22 and also welcomes the protection of the alignment of the preferred route of the N16 through the Proposed Amendment no. 83.

The Proposed Amendments no. 23 and 64 are also noted and supported.

Issue no. 2

The National Roads Authority refers to its previous submission made in relation to the Sligo Bypass (Submission no. 141 in the Second Manager's Report) and its recommendation to omit **Section 10.2.7 Objective T1.5a-Western/City bypass**. It is noted that this has not been removed and that the Proposed Amendment no. 19 restricts further areas for route options.

No technical reasons exist in the Draft Plan or in the Proposed Amendments to justify such restrictions on the assessment of route options.

The Authority reiterates comments made on the submission to the Draft Plan:

“Given the strategic importance of the City Bypass and the wider benefits that the route can bring both nationally and regionally by linking gateways to the north and south of Sligo, the Authority considers it entirely inappropriate and contrary to established best practice procedures to seek to restrict consideration of route options.”

It is indicated that the Authority has a statutory obligation to ensure that there is consideration of alternative route options in the process of road scheme planning and route selection. There are national and EU legislative requirements in this regard and it is a matter in the first instance for Sligo local authorities to ensure compliance with these statutory obligations.

Reminding that the NRA funded the feasibility and route option studies for a Western Bypass, in response to the County Manager's application of 2005, the Authority states the following:

“In the event that provision are included in the Development Plan that would operate to prevent the possible further advancement of the bypass proposal on the basis of investigations already completed, the Authority would not be convinced of the case for seeking to advance the planning of a Sligo bypass and would require repayment of the funding previously made available to Sligo County Council in relation to the Bypass project.”

Issue no. 3

The NRA welcomes the Proposed Amendment no. 61 in relation to large retail centres and welcomes the clarification provided in the Proposed Amendment no. 4 incorporating paragraph 26 of the Retail Planning Guidelines (2005).

Issue no. 4

In relation to the rezoning of lands near the Carrowroe junction (Proposed Amendment no. 76, no. 11 and no. 91), the NRA finds it unclear how the proposed site will access the local road network, as, in line with the Proposed Amendment no. 13, no direct access is to be permitted onto the N4.

In addition, this rezoning would have an impact on any required junction upgrade to facilitate any future Sligo bypass and acquisition costs associated with any required junction access would greatly increase.

Rezoning and development objectives should not have the effect of increasing the cost of land to be acquired for national road purposes. Therefore, the Authority opposes the zoning of such lands for development.

Issue no. 5

The NRA notes the proposed zoning Amendment no. 81 to provide for a retail warehouse option. The NRA recommends that the site is subject to a TTA and RSA in accordance with proposed amendment 63.

Opinion

1, 3 and 5. The NRA's comments are noted.

2. The NRA's concerns are shared by the Manager, whose opinion on this matter has already been stated in the Second Manager's Report.

The local authorities have a statutory obligation to implement EU and national policy through their development plans. The Draft SEDP fully acknowledges the national and regional importance of the Atlantic Road Corridor as set out in Transport 21 and the National Spatial Strategy.

The need to protect this strategic link between Atlantic Gateways while continuing the development of Sligo City is given due recognition in the Draft Plan through Section 10.2.5 Strategic Road Objective T1.5 City Bypass. This objective clearly avoids the imposition of a pre-determined route corridor.

Given the complex environmental, social and planning/engineering problems that would need to be addressed as part of any bypass route selection on the western side of the city, it is evident that a range of studies must be carried out, such as environmental impact assessment (EIA), strategic environmental assessment (SEA) and Habitats Directive assessment (HDA), in addition to extensive consultation with all stakeholders. All assessments are legally required to consider a range of options.

By restricting the investigation of alternative options as part of the environment-related assessments of a possible City Bypass, the technical/scientific approach would be flawed and the legal procedures relating to route selection would be prejudiced.

It is therefore strongly recommended that all possible options be investigated and further consultation be carried out on these options, as previously recommended in the Manager's Report on submissions relating to the Proposed Variation no. 6 of the SEDP 2004-2010. Every effort

should be made to secure continued funding from the NRA for carrying out the necessary studies relating to the city bypass.

Subsection 10.2.7 together with its Addendum introduced under Proposed Amendment no. 19 should be deleted from the Draft SEDP. The related Proposed Amendment no. 86 should not be adopted.

4. Whilst the route for the T1.5 (City Bypass) has yet to be decided, it is anticipated that the route at Tonafortes will remain as initially proposed, due to physical constraints in the area. Zoning of lands along the wider route corridor will have to be reconfigured after the route selection process is completed. However, at this stage it is premature to zone any lands for development in the area.

The Proposed Amendments no. 76, no. 11 and no. 91 should not be adopted.

Recommendations

A. The Proposed Amendments no. 19 and no. 86 should not be adopted.

B. The Proposed Amendments no. 76, no. 11 and no. 91 should not be adopted.

Submission no. 60

16 September 2009

Brian Kenny on behalf of the
Planning and Spatial Policy Section, DoEHLG

SBC/SCC

The submission indicates that, while many of the issues raised by the Department (in its submission of 22 April 2009) in relation to the direction of future planning policies in Sligo have been addressed, two issues have not been addressed.

Specifically, the Proposed Amendments failed to include any specific objectives in support of the Eastern Garavogue Bridge and Western Bypass.

Issue no. 1

The Minister is very concerned that, having undergone an extensive design and public consultation exercise at considerable public expense, and having regard to the critical nature of the Eastern Bridge – placed at the location approved by an Bord Pleanála – to the sustainable development of Sligo and regeneration of Cranmore, the 2010-2016 Development Plan must include a specific objective to support this proposal.

Issue no. 2

The Minister understands that, while detailed technical evaluation and design options for a Western Bypass of Sligo have yet to be conducted and/or concluded, objectives now inserted in the plan would effectively act to frustrate the preparation and evaluation of a range of options that would be expected to arise in the normal course of the preparation and evaluation of major transport investment projects.

Such action is contrary to the role and function of development planning.

Issue no. 3

In the light of these critical and far-reaching concerns, if the amended draft development plan were to be adopted without the above issues being fully provided for, the Minister would be of the view that the Planning Authorities would not be adopting a strategy for the proper planning and sustainable development of Sligo and its environs as required by the Planning Act and would be acting to frustrate

the strategic development of Sligo, which has been designated a Gateway by Government under the National Spatial Strategy and has benefited from sustained public investment in critical and enabling infrastructure.

Issue no. 4

It is indicated that the Planning Authority must examine all available options to satisfactorily address the issues outlined above and that the Department is available to assist the Planning Authorities and clarify any technical matters arising if so required. Without a substantive effort to address the matters above, the Minister will have no option but to consider the use of the powers available to him under the Planning and Development Act 2000 to ensure that planning policy for Sligo at the local, regional and Government levels are consistent.

Opinion

1. The Minister's concern is noted. The Manager's opinion in relation to the Eastern Bridge and Associated roads Scheme was expressed in the Second Manager's Report on submissions and observations relating to the Draft SEDP (1 July 2009). It was considered at that stage that the reinclusion of the T1.3 and T2.7 objectives would ensure a sound and consistent basis for the Development Plan in terms of its core Spatial Strategy, integration of land use and transport, and the sustainable development of the Cranmore-Cleveragh and Hazelwood-Ballinode areas, while preserving the exquisite natural heritage of Lough Gill and its surroundings.

However, the Manager's recommendation to re-instate the objectives T1.3 and T2.7 in the Development Plan was rejected by the members of Sligo Borough Council. Consequently, there was no amendment proposed in relation to the Eastern Garavogue Bridge and Associated Roads Scheme.

The third stage of public consultation has been focused on the Proposed Amendments placed on public display from 19 August to 16 September 2009. Following consideration of the Proposed Amendments and the Third Manager's Report (this report), the elected members are restricted to adopting the Development Plan with or without any of the Proposed Amendments, or with minor modifications thereof.

As the reinsertion of objectives T1.3 and T2.7 at the final stage would represent a material change, not a minor modification, the elected members are not legally entitled to take any action regarding the Eastern Garavogue Bridge and Associated Roads Scheme.

However, the two objectives could be inserted in the Development Plan after its adoption, using the variation procedure specified in Section 13 of the Planning and Development Act 2000 (as amended).

2. The Manager shares the Minister's opinion that new text proposed for inclusion in the Plan in relation to the City Bypass would frustrate the preparation and evaluation of a range of options for this major transport artery, an action that would be contrary to the role of development planning.

In the Second Manager's Report, the Manager recognised that, by restricting the investigation of alternative bypass options as part of the required environment-related assessments, the technical/scientific approach would be flawed and the legal procedures relating to route selection would be prejudiced.

The Manager recommended that all possible options be investigated and further consultation be carried out on these options. This recommendation is maintained.

Furthermore, it is noted that the Proposed Amendment no. 19 identifies the preferred location of a Bypass as "elsewhere", so as not to impact on people living to the west of the First Sea Road. The

Proposed Amendment no. 19 also involves the deletion of previously-agreed portions of the route of objective T1.5 at Carrowroe, Tonafortes and Oakfield, with the effect of eliminating a western bypass option entirely.

It is strongly recommended that Subsection 10.2.7 together with its Addendum introduced under Proposed Amendment no. 19 should be deleted from the Draft SEDP.

3. The Manager concurs with the Minister's view that Sligo and Environs Development Plan, adopted without addressing the crucial issues relating to the Eastern Bridge and City Bypass, would not represent an overall strategy for the proper planning and sustainable development of Sligo and its environs as required by the Planning Act, and would hinder the development of Sligo as a Gateway City.
4. Under the Planning and Development Act 2000 (as amended), the options available to address the issues raised in a satisfactory manner are limited at this stage.

Should Sligo Borough Council wish to re-insert the road objectives T1.3 and T2.7 in the Development Plan, it cannot do so at this stage, as there is no legal provision to introduce material changes upon adoption of the SEDP. The Borough Council could, however, re-insert the objectives by varying the Plan immediately after its adoption, using the variation procedure outlined in S. 13 of the Planning Act.

Sligo County Council has the option of deleting the extensive Section 10.2.7 and its Addendum restricting the location of route options for a future City Bypass.

Should the Plan be adopted without addressing the two issues, it would be deemed as failing to set out an overall strategy for the proper planning and sustainable development of the area. In such circumstances, the Minister may, for stated reasons, direct the Planning Authorities to take such specified measures as he or she may require to ensure that the development plan, when made, is in compliance with the Planning Act. The Planning Authorities would be legally obliged to comply with any such direction. The measures required by the Minister would involve reviewing or varying the Development Plan.

Recommendations

The Proposed Amendment no. 19 should not be adopted. Section **10.2.7 Objective T1.5a – Western/City Bypass** should be deleted in its entirety.

Submission no. 61

16 September 2009

Seána McGearty, Co-ordination Unit

Department of Communications, Energy and Natural Resources

SBC/SCC

Issue no. 1

The submission is made on behalf of the Engineering Division of the Department, which indicates that it has no comment to make on the proposed amendments to the Draft SEDP.

Opinion

The submission is noted.

Recommendation

No action to be taken on foot of this submission.

Submission no. 62

16 September 2009

Eugene McGloin, Secretary
on behalf of the Doorly Park/Martin Savage/Garavogue-Hazelview
Campaign Committee (eastern Garavogue crossing)

SBC

Issue no. 1

The campaign committee represents residents of the Doorly Park, Martin Savage Terrace and Hazelview-Garavogue residential areas.

It is stated that the committee supports the pedestrianisation of O'Connell Street in accordance with the objectives outlined in the Proposed Amendments, particularly O-PED-1, which aims to pedestrianise the street subject to the availability of funding and agreement from the Borough Council.

The committee contends that their residential area has been adversely and severely impacted by the "premature decision" to close O'Connell Street. It states that appropriate enhancement works have not been progressed and raises concerns regarding emergency vehicle access to the street.

The committee contends that the opening of the street to vehicular traffic would not adversely impact on business and traders.

It is stated that traffic access and egress to/from the East Ward and lower East Ward need to be managed and facilitated in an orderly and reasonable way, and that the premature manner adopted to date cannot continue.

The submission includes a number of signatures (stated to be 100) of persons who confirm the following:

- support for pedestrianisation;
- support for the proposed amendments to section 10.4 of the Draft Plan;
- acknowledgement of Addendum (II) to Environmental Report regarding objective O-PED-1.

Issue no. 2

The submission refers to the proposed amendments to Chapter 9 – The value of Culture in Place-making, and agrees with the following principle: "a place is made up of diverse resources which need to be surveyed, acknowledged and understood before policy can intervene". It is stated that this principle should not only apply to this chapter.

Issue no. 3

The submission notes that Chapter 17 is a new chapter and that it has been written by the executive. The submission contends that the projects identified for funding under the Gateway Innovation Fund are not linked into a coherent vision for the short-term development of Sligo City and that any such inference should be deleted.

Opinion

1. Support for the pedestrianisation of O’Connell Street is noted and agreed. However, as outlined in the Manager’s opinion on submissions related to the Proposed Amendment no. 24 (see page 3 of this Report), it is considered that pedestrianisation should not be subject to the availability of adequate funding to carry out the full range of environmental enhancement works as set out in the proposed amendment.

The closure of O’Connell Street was not premature – as the street was closed after the opening of the Inner Relief Road, which removed a substantial amount of traffic from the city centre – and it did not have any severe or adverse impact on the eastern area of the city. Indeed, it is considered that the reopening of the street to vehicular traffic would have a minimal impact on journey times around the city, potentially negative.

City centre retailing and other businesses would be strongly supported by a pedestrian-friendly environment. This view is shared by a number of other submissions, in particular Submission no. 42 on behalf of the Traders of O’Connell Street.

It is acknowledged that the Addendum to the Environmental Report states that proposed objective O-PED-1 – which essentially indicates that pedestrianisation of O’Connell Street would happen on an unspecified date in the future – would be likely to have positive environmental effects with regard to minimizing increases in travel-related greenhouse emissions to air and reducing car dependency within the Plan area. It should be noted, however, that the same assessment would apply to an objective to retain O’Connell Street as a pedestrian urban area.

It is considered that the Proposed Amendment no. 24 should not be adopted.

2. The observation is noted. It is considered that this principle is already adequately reflected throughout the Draft Plan, which gives sufficient importance to the value of place and local communities.
3. It is confirmed that Chapter 17 is a new chapter that has been written by the executive – as was, indeed, most of the Development Plan – and agreed as a proposed amendment by both Sligo County Council and Sligo Borough Council. However, contrary to the contents of this submission, it is considered that the ongoing and future projects relating to the East Ward are of strategic importance and are linked into a coherent vision for the development of Sligo City.

It is considered that Chapter 17 – Proposed Amendment no. 68 – should not be further modified.

Recommendations

- A. The Proposed Amendment no. 24 should not be adopted.
- B. The Proposed Amendment no. 68 should be adopted without any further modifications.

Submission no. 63

16 September 2009

Robert McLoughlin, GVA Planning
on behalf of Tesco Ireland Ltd.

SCC

Issue no. 1

The submission notes the proposed zoning amendment in respect of the Tesco-owned lands at Carrowroe, from MIX-1 to MIX-2.

It is requested that the zoning of the subject site be changed to “District Centre (Zoning Objective C3 under the Sligo and Environs Development Plan 2004-2010). Reference is made to the submission made at draft stage by GVA Planning on behalf of Tesco Ireland Ltd.

Issue no. 2

The submission seeks rewording of the **Proposed Amendment no. 2** to differentiate the specific needs of food stores from higher order shopping associated with Town Centres. It is requested that the text in green be added to Section 6.5.4, at the end of the text subject to Proposed Amendment no. 2 (red, blue and black text):

~~“In the event of all currently available city centre sites becoming occupied in the future,~~ Lands in the Docklands, to the west of the Inner Relief Road and to the east and south-east of the city centre, will offer the most suitable edge-of-centre locations for retail expansion ~~after commercial development will have been substantially completed on all available city centre sites.~~ These edge-of-centre areas are accessible by foot, by public and private transport, and contain a certain amount of brownfield and under-utilised land.

In addition to Town Centre and edge of centre sites being considered for Town Centre expansion, sites for Foodstore development will be considered at other locations where it is demonstrated that a need exists and that this form of retailing cannot be accommodated at Town Centre and edge of centre locations.”

Issue no. 3

The submission opposes the **Proposed Amendment no. 3** and requests that the sentence “It is recognised that these constraints exist in Sligo” be retained in Section 6.5.6 of the Plan.

Issue no. 4

It is requested that the text shaded in green be added to the **Proposed Amendment no. 61** (blue text):

“In accordance with the requirements of the Retail Planning Guidelines there will be a presumption against the location of large retail centres adjacent or close to existing or planned national roads / motorways.

Exemptions to this will be retail warehousing and foodstore development where sufficient capacity in the road network has been demonstrated.”

Issue no. 5

The submission requests that the sale of lower-order comparison products be permitted or open to consideration on MIX-2-zoned lands where they are an integral part of the delivery of a food store. It is argued that the Zoning Matrix should be altered in order to “safeguard the deliverability of mixed use proposals (for example food stores and/or retail warehousing). It is suggested to achieve this by adding a note to the Zoning Matrix as follows:

“Lower order comparison retailing may be permitted on Mix 2 zoned lands where it is in association with convenience retailing forming an integral part of an overall foodstore development.”

Issue no. 6

As part of modifying the **Proposed Amendment 81** by means of the note requested above, a specific objective is sought for the Tesco site as follows:

"To provide for the delivery of a Foodstore to address current levels of leakage and act as a complementary retail hub to higher order Town Centre retailing."

Opinion

1. As indicated in the Second Manager's Report (1 July 2009) in response to Tesco's previous submission, the Joint Sligo City and County Retail Strategy 2010-2016 does not recommend the designation of a District Centre within the SEDP area, because the projected convenience and comparison goods net floor space requirements can and should be accommodated in the city centre, edge-of-centre areas and neighbourhood centres.

It is considered that the subject site should not be zoned "District Centre".

2. Outside the city centre and edge-of-centre areas, the Retail Strategy associated to the SEDP makes adequate provision for the location of food stores in a range of neighbourhood centres, where they would be optimally placed to serve Sligo's residents. This is considered sufficient for the lifetime of the SEDP 2010-2016 and beyond.

Both the Retail Strategy and the Draft SEDP identify only limited capacity for further convenience retail provision to 2015 and 2020. The Retail Strategy identifies two suburban centres with the aim of achieving balanced growth. The Plan seeks to encourage foodstore development in these centres to promote higher levels of activity, rather than promoting development outside them or on their edge.

The suggested insertion is neither a contribution to nor a refinement of Development Plan policy. While it reflects the principles of the sequential approach outlined at Paragraph 59 of Retail Planning guidance, their application would generally be employed in assessing related development proposals rather than constituting strategic direction.

The Draft Plan notes a number of retail development opportunities in central areas and notes that their development should remain a priority (Location of new floor space, p. 26 of the Draft SEDP). The Plan also includes policies in support of town centre development (including transportation). It is not appropriate to state, at this stage, that food retailing cannot be accommodated at town-centre or edge-of -centre locations.

There is no need to provide for other, unidentified, locations as part of the Proposed Amendment no. 2. The requested insertion/modification of the Proposed Amendment no. 2 should be rejected.

3. The Proposed Amendment no. 3 reads as follows:

"In **Section 6.5.6 Other types of retail development** (p. 27 of the Draft SEDP), under the heading **Large food stores**, delete the last sentence of the second paragraph:

Large food stores should be located in the city centre or on the edge of the centre. However, an out-of-centre location may be considered where it has been demonstrated that it is not possible to bring forward sites which are in or on the edge of the city centre, because of the site size requirements of large food stores, urban design constraints or because the road network does not have capacity for additional traffic and service vehicles. ~~It is recognised that these constraints exist in Sligo."~~

As previously indicated in the Second Manager's Report, the sentence proposed for deletion is a factual statement. Section 6.5.6 refers to constraints which affect all town and city centres to

varying degrees. Constraints like those enumerated in the second paragraph of Section 6.5.6 of the SEDP do exist in Sligo. Furthermore, the deletion of the Eastern Bridge objective from the Plan would impose further constraints by limiting the future capacity of the road network. Removing the sentence would not make such constraints disappear.

One of the functions of the Development Plan is to formulate policies that encourage town centre improvement. The draft Plan therefore aims to provide a framework of integrated policies which would ensure that constraints are addressed, while promoting increased activity in the City Centre.

It is not considered necessary to remove the said sentence from Section 6.5.6.

4. The submission contends that stand-alone food stores are comparable to retail warehousing in terms of traffic generation. At paragraph 75, the Retail Planning Guidelines are clear as to where large food stores should be preferably located: *“Wherever possible, large food stores should be provided in a town, major village or district centre or on the edge of the centre where public transport provision can be made available for shoppers who do not have the use of a car.”*

As it is required to do, the draft SEDP provides strategic guidance on the location and scale of retail development. It adopts a consistent framework of policies which support retail development in centres in the retail hierarchy.

The Transportation Section of the Borough Council has indicated that development proposals must comply with the NRA’s policy on development management and access to National Roads, in particular the development being subject to the carrying out of a TTA and RSA in accordance with NRA and DTO guidelines. This is provided for in amendment 63. Exemptions to proposed amendment 61 are therefore not necessary.

Furthermore, as part of the consultation on the Draft Plan, the National Roads Authority requested that the plan should reflect – in Section 16.4.2 Permitted locations for shopping facilities – the explicit presumption against large-scale retailing adjacent to existing, new or planned national routes presented under paragraph 26 of the Retail Planning Guidelines.

The NRA was concerned about the protection of the existing national road network. These issues are covered in the NRA’s publication *Policy Statement on Development Management and Access to National Roads*, which sets out official government policy in relation to national roads.

It was considered that a general policy should be included in the SEDP regarding the consideration of development proposals which may impact on the national road network, hence the Proposed Amendment no. 61.

Including the suggested text in the proposed amendment would negate the very purpose of the amendment and would contradict policies seeking to protect the capacity of the national roads. Limited exceptions would only be considered in the case of large retail warehouses, in accordance with the provisions of paragraph 26 of the Retail Planning Guidelines.

It is considered that no exemptions should be put in place for large food stores as part of Proposed Amendment no. 61. No change is recommended to the wording of the Proposed Amendment no. 61.

- 5 and 6.** The provisions regarding the location of food stores are set out in Sections 6.5.6 and 6.5.7 of the Draft SEDP, together with the relevant proposed amendments to Chapters 6 and 16.

The subject site is not a designated location for a food store, as it is not located in a neighbourhood centre or on the edge of the city centre.

The SEDP has a clear rationale in identifying Carrowroe as a NC-2 Neighbourhood Centre, based on the emerging needs of its local area with residential expansion anticipated in the plan period.

As the Draft Retail Strategy indicates, Sligo City and its urban outskirts have relatively high levels of convenience expenditure retention among residents (89% and 88% respectively). While, the analysis does identify significant levels of expenditure leakage from parts of Sligo County, the Draft Retail Strategy recommends this is best met in centres in the County such as Ballymote (this will be considered as part of the Review of the County Development Plan).

The Draft Retail Strategy identifies only a limited requirement for additional retail warehousing. The draft SEDP accommodates this in existing allocations and with identification of a retail warehouse park not exceeding 5,000 sq.m. at Shannon Eighter.

The Zoning Matrix included in the Draft SEDP indicates that convenience retail would be open to consideration on lands zoned MIX-2, while comparison shopping would not be permitted. It is not considered appropriate to amend the Zoning Matrix as requested in the submission.

It would also be inappropriate to designate the subject site as a suitable location for the development of a food store, as it is not part of a neighbourhood centre.

The request to include an objective designating Tesco's site as the location of a food store should therefore be rejected.

Recommendations

- A. No change is recommended in relation to the Proposed Amendments no. 2, 61 and 81, which should not be modified as requested in this submission.
- B. The Proposed Amendment no. 3 should not be adopted.

Submission no. 66

16 September 2009

Brian Meehan & Associates
on behalf of Newbay Doherty Group

SCC

Issue no. 1

The submission refers to Sligo Retail Park at Carrowroe. It acknowledges the Proposed Amendments no. 5 and no. 66.

Issue no. 2

In relation to Proposed Amendment no. 5, the submission seeks adjustment of the 20% provision for ancillary comparison goods in retail warehouses in P-RP-13 to 30%. It is suggested that the reference – “if the connection between the two types of goods can be clearly demonstrated” be removed on the basis that retail warehousing is reserved specifically for the sale of bulky items.

The Proposed Amendments currently reads as follows:

R-RP-13 ~~Restrict~~ Generally confine retail warehouse developments to the sale of bulky goods or goods generally sold in bulk and ensure these developments are of appropriate scale. Maximum 20% of the net floor space may be used for the sale of comparison goods ancillary to the main bulky goods if the connection between the two types of goods can be clearly demonstrated, and if it can be shown that the city centre would not suffer adverse impacts.

If modified as requested, the amendment would read:

- P-RP-13** Confine retail warehousing developments to the sale of bulky goods or goods generally sold in bulk and ensure these developments are of an appropriate scale. Maximum **30%** of the net floor space may be used for the sale of comparison goods if it can be shown that the city centre would not suffer adverse impacts.

Issue no. 3

The submission argues that discount food stores are most comparable to retail warehousing in terms of traffic generation. Regarding the Proposed Amendment no. 62, it is requested that Section 16.4.15 be modified further by inserting the text shown below in green at the end of the amendment:

Discount food stores may be permitted to locate in neighbourhood centres, subject to relevant floor space restrictions, in the following circumstances:

- a. it can be proven that there would be no negative impact upon the vitality and viability of the city centre or upon the amenity of the city or of the neighbourhood centre and surrounding area;
- b. the development proposal is supported by a masterplan covering the entire area of the neighbourhood centre. The masterplan should be based on sound urban design principles, should demonstrate appropriate layout and design of buildings as well as integration of the discount food store and the other proposed/potential structures/uses, ensuring that the emerging neighbourhood centre will not appear to be “mono-use” or be visually dominated by a single-use retail structure or a car parking area.
- c. there is adequate accessibility by different modes of transport, including for pedestrians.

Discount Foodstores may also be permitted to locate within existing Retail Parks subject to demonstration of compliance with the requirements of a, b and c above.

Issue no. 4

In tandem with the requested modification of the Proposed Amendment no. 62, it is also requested to modify the Zoning Matrix by making the use category “retail – shop (convenience) open to consideration in areas zoned RP/retail park.

Opinion

1. The acknowledgement is noted.
2. Most retail warehouse operators maintain a minor number of *related* lines which do not conform with the bulky goods definition. The policy as worded acknowledges this. Retail Planning Guidelines (paragraphs 77-80) note that retail warehouses sell mainly bulky goods, and also note the potential risks of town centre impacts associated with the expansion and the broadening of the goods types sold in retail warehouses. The 20% threshold seeks to reflect this balance.

While increasing the quota of comparison goods from 20% to 30% would be acceptable to the planning authority, these goods should be ancillary or related to the main bulky goods sold in the retail park.

In order to avoid a potential transformation of one-third of the retail park into comparison shops, the policy P-RP-13, subject to the Proposed Amendment no. 5, should be further clarified by indicating that up to 30% of the net floor space of any retail warehousing unit may be used for the sale of comparison goods ancillary to the main bulky goods.

3. At paragraph 76, the Retail Planning Guidelines note the potential role of discount stores in anchoring neighbourhood centres (as acknowledged in the draft SEDP). As it is required to do, the draft SEDP provides strategic guidance on the location and scale of retail development. It adopts a consistent framework of policies which support retail development in centres in the retail hierarchy.

The rationale for excluding discount food stores as a possible use in a retail park has been clearly outlined in the Second Manager's Report.

It is considered that the appropriate location of discount food stores is in neighbourhood centres, within a short distance of their potential customers, at locations with good accessibility by foot and by bicycle.

There is one designated neighbourhood centre within 500 metres of the Retail Park, at Carrowroe, where a discount food store could be accommodated, subject to floor space and design requirements.

The Retail Park serves a much wider catchment and should continue to perform its main retail function, which is different from that of a neighbourhood centre. The introduction of convenience shopping facilities at this location would affect the potential for similar development in designated neighbourhood centres.

The requested modification of the Proposed Amendment no. 62 should be rejected. It should also be noted that this is not a minor modification.

4. As indicated under no. 2 above, convenience shops are expected to locate in neighbourhood centres, where there is good pedestrian and cycle access from the adjoining residential areas. Convenience shops should not be normally permitted in retail parks.

The draft SEDP makes appropriate provision for anticipated convenience retail requirements over the Plan period. It encourages the development of such floor space in centres in the retail hierarchy as part of the development of a sustainable range of centre facilities supporting the needs of an appropriate catchment population (whether neighbourhood or City).

The requested modification of the Zoning Matrix should be rejected. It should also be noted that this is not a minor modification.

Recommendations

- A. Modify the Proposed Amendment no. 5 by inserting the text shown in green below:

P-RP-13 ~~Restrict~~ Confine retail warehouse developments to the sale of bulky goods or goods generally sold in bulk and ensure these developments are of appropriate scale. Maximum 30% of the net floor space of any individual warehousing unit may be used for the sale of comparison goods ancillary to the main bulky goods, if the connection between the two types of goods can be clearly demonstrated and if it can be shown that the city centre would not suffer adverse impacts.

- B. The Proposed Amendment no. 62 and the Zoning Matrix should not be modified as requested in this submission.

4. Response to late submissions on the Draft Plan

Submission no. LSDP-1

23 April 2009

Patrick Lynch

SCC

The submission relates to the North Fringe Local Area Plan and is identical to forty-four other submissions which were previously addressed in the Second Manager's Report.

Issues

In summary, the issues raised are as follows:

- excessive scale of proposed development;
- premature development of this area;
- impact on the rural character and visual amenities of the area;
- adoption of inappropriate development models;
- absence of an adequate road infrastructure;
- sterilization of all lands at this location;
- concerns regarding the proposed route of a new road and roundabout;
- the appropriate location for educational facilities in the area;
- excessive density of proposed development.

Opinion

All of these issues were comprehensively reviewed and addressed in Sections 1.4.1 to 1.4.15 of the Second Manager's Report. Emerging from this review, a number of recommendations were made in the Second Manager's Report (section 1.4.16). In summary, the recommendations included the following:

- confirmation of the long-term timeframe of the North Fringe LAP;
- commitment to the incremental development of the lands in parallel with the provision of adequate infrastructure;
- provision for the accommodation of one-off housing in suitable circumstances;
- revision to the proposed road route and roundabout locations.

These recommendations were adopted by the Council members and have been included in the Proposed Amendments no. 94 to 101. It is considered that these amendments have adequately addressed these issues and no further amendments to the Draft Plan are therefore necessary.

Recommendations

The North Fringe LAP should be modified in accordance with the Proposed Amendments 94 to 101. No further changes should be made to the Draft Plan on foot of this submission.

Submission LSDP-2

24 April 2009

Aidan Mannion

on behalf of Old Sligo Action Group

SBC

Issues

The submission expresses concern on behalf of traders over the removal of the proposed Eastern Garavogue crossing from the Draft Sligo and Environs Development Plan 2010-2016. It is stated that the Eastern Bridge is the single most important infrastructural project in Sligo and is key to improving accessibility/traffic flow and pedestrian walkways in the town centre. The group strongly urges the inclusion of the Eastern Garavogue crossing in the Plan.

Opinion

This issue was comprehensively addressed in section 1.1 of the Second Manager's Report. Emerging from this, a number of recommendations were made in the Second Manager's Report (section 1.1.11). In summary, the report recommended an amendment to the Draft Plan to re-instate the Eastern Bridge and associated roads (objectives **T1.3** and **T2.7**), including relevant text and map references.

These recommendations were not agreed by the Council members however, and accordingly were not included in the Proposed Amendments to the Draft SEDP 2010-2016. Therefore, this issue cannot be considered at this stage.

Recommendation

No action to be taken on foot of this submission.

Submission no. LSDP-3

27 April 2009

Eugene O' Neill, Architect

on behalf of Quayside Shopping Centre

SBC

Issues

The submission is essentially the same as Submission no. 84 made at the previous stage in response to the Draft SEDP, as outlined in the Second Manager's Report. The submission refers to the parking requirements set out in **Table 16.B Vehicle Parking Requirements** (p. 143 of the Draft SEDP).

It is indicated that the provision of car-park spaces imposes a significant financial burden on developers and it is requested that the requirements set out in Table 16.B be changed to one space per 50 sq.m. of retail floor space for both shops and supermarkets.

Opinion

This issue was addressed in the Second Manager's Report. In summary, it was considered that the Draft Plan requirements were consistent with national figures and were appropriate for these circumstances.

The Second Manager's Report recommended that the Draft Plan figures should not be changed and this recommendation was adopted by the Council members. No changes to **Table 16.B Vehicle Parking Requirements** were included in the Proposed Amendments and therefore this issue can not be considered at this stage.

Recommendation

No action to be taken on foot of this submission.

Submission no. LSDP-4

5 May 2009

Fergal Broder (Chair, North-West Region and Managing Director of Lotus Works)
and Brian Cotter (Government Affairs Manager)
on behalf of the American Chamber of Commerce Ireland

SBC

Issues

The submission is essentially the same as Submission no. 125 made at the previous stage in response to the Draft SEDP, as outlined in the Second Manager's Report.

The submission emphasises the importance of investment in infrastructure for the delivery of sustainable regional development and the attraction of further investment. The submission argues that the Eastern Garavogue Bridge is a key infrastructural component for Sligo as a Gateway City, as well as for its environs.

The submission strongly recommends that the Eastern Garavogue Bridge is reincluded in the SEDP as a key element of the city's accessibility and traffic flow management infrastructure.

Opinion

This issue was comprehensively addressed in section 1.1 of the Second Manager's Report. Emerging from this, a number of recommendations were made in the Second Manager's Report (section 1.1.11). The Report recommended an amendment to the Draft Plan to re-insert the Eastern Bridge and associated roads (objectives **T1.3** and **T2.7**), including relevant text and map references.

These recommendations were not adopted by the Council members however, and accordingly were not included in the Proposed Amendments to the Draft SEDP 2010-2016. Therefore, this issue can not be considered at this stage.

Recommendations

No action to be taken on foot of this submission.

Submission no. LSDP-5

12 May 2009

Proinsias De Bátúin
on behalf of the Development Applications Unit (DoEHLG)

SBC/SCC

The submission includes the architectural heritage recommendations of the Department of the Environment, Heritage and Local Government (DoEHLG).

Issue no. 1

The submission welcomes Sligo Borough Council and Sligo County Council's commitment to the protection of the architectural heritage of the town as set out in Chapter 13 of the Draft SEDP 2010-2016. It is considered that some of the text in Chapter 13 should be clarified and strengthened.

Issue no. 2

It is suggested that the wording "currently in poor condition" be omitted from the first bullet point in Section 13.2.3 Enabling development.

Issue no. 3

It is recommended that any structures affected by policy P-BH-14 (p. 106 of the Draft Plan) and objective O-BH-5 be considered for inclusion in the Record of Protected Structures.

Issue no. 4

It is suggested to omit the wording “whether protected or not” from the text of policy P-BH-20 and to consider changing “historic buildings” to “structures of architectural heritage merit”.

Issue no. 5

It is considered that the text of Section 13.2.5 Strategic Environmental Assessment (SEA) mitigation policies could be omitted in its entirety, as the various architectural heritage policies and objectives included in Chapter 13 make it irrelevant/redundant. Should the text be retained, it is suggested to omit the reference to the “Venice Charter and subsequent ICOMOS Charters” (inappropriate in context), to replace “highest conservation standards” with “a high conservation standard” (more reasonable) and to include a definition of “accredited conservation architect” (because a statutory definition does not exist).

Opinion

1. Noted.
2. Agreed. The wording in question can be omitted, as it is superfluous in the given context. This omission would not involve any changes to policy or objectives.
3. The Draft RPS already includes several structures mentioned in policy P-BH-14 (i.e. bridges, cast-iron pumps, post-boxes etc.). Objective O-BH-5 proposes to identify further structures that merit inclusion in the RPS. When/if identified, such structures will be considered for inclusion in the RPS at its next review.
4. It is considered that the proposed omission of the text “whether protected or not” would not constitute a clarification of the policy P-BH-20, but the contrary. It is accepted, however, that replacing “historic buildings” with “structures of architectural heritage merit” would be a clarification and would bring the wording of the policy in line with planning legislation and relevant guidelines.
5. The SEA Mitigation Policies have the same legal status as all other policies in the Plan. The Second Manager’s Report on submissions and observations relating to the Draft plan specified that “they will be updated, if necessary, to respond to changes proposed to other policies and objectives of the Plan” and that “after the SEDP is adopted, before publication, the SEA Mitigation Policies will be integrated under the relevant heading in specific chapters, and will be numbered/coded in the same manner as the other policies”. Subsection 13.2.5 will therefore be omitted from the final version of the Plan, as the mitigation policies will be incorporated in the previous subsections of Section 13.2.

It is agreed that the reference to the “Venice Charter and subsequent ICOMOS Charters” should be omitted and that “highest conservation standards” should be replaced with “a high conservation standard”.

Regarding the definition of an “accredited conservation architect”, what was meant was an Architect or Practice accredited by the RIAI under its system that recognises various levels of expertise in building conservation. The text of the policy should be clarified and a note should be inserted explaining accreditation system.

Recommendations

- A. Clarify the text of policy P-BH-20 by replacing the “historic buildings” with “structures of architectural heritage merit”.
- B. When incorporating the contents of 13.2.5 in the relevant subsections of Section 13.2, omit the reference to the “Venice Charter and subsequent ICOMOS Charters” and replace “highest conservation standards” with “a high conservation standard”.
- C. When incorporating the policy 13.2.5.B in the relevant subsection of Section 13.2, replace the words “accredited conservation architect” by “**RIAI-accredited architect or practice (or foreign equivalent for non-Irish architects or practices)**” and insert the following explanatory footnote:

To assist clients in the selection of a practice able to provide them with professional services in architectural conservation, the Royal Institute of Architects of Ireland (RIAI) developed an accreditation system to recognise differing levels of specialist expertise. There are three grades of accreditation, Grade I being the highest and Grade III the basic entry level to the system. Detailed information can be found on the website of the RIAI at www.riai.ie.

Submission no. LSDP-6

4 June 2009

Proinsias De Bátúin

on behalf of the Development Applications Unit (DoEHLG)

SBC/SCC

The submission includes the archaeological heritage recommendations of the Department of the Environment, Heritage and Local Government (DoEHLG).

Issue no. 1

It is suggested to modify the objective O-AH-6 (p. 141 of the Draft Plan) as follows:

- O-AH-6** Identify and protect internationally important archaeological landscapes such as the megalithic cemetery of Carrowmore and its associated monuments at Knocknarea and Cairns Hill in co-operation with the appropriate Government agency *bearing in mind not only the individual monument at each of these locations but also having regard to the maintenance and protection of inter-visibility between these locations.*

Issue no. 2

It is suggested to modify the policy P-AH-13 (p. 92 of the Draft Plan) as follows:

- P-AH-13** Protect the vulnerable archaeological and cultural landscapes and protect views within and adjacent to Carrowmore Megalithic Cemetery, Knocknarea and Cairns Hill *and between these elements.*

Issue no. 3

It is noted that on pages 16 and 17 of the Draft North Fringe LAP there is no buffer indicated around Recorded Monuments SL014-017 (Enclosure) and SL014-01701 (Standing Stone). It is recommended to establish a 30-m buffer around these monuments, where no ground works for construction or landscaping should take place.

Issue no. 4

The Development Applications Unit expresses serious reservations regarding the proposed change of zoning “from existing use to R1 – low-density residential areas”. It is stated that the area proposed to

be rezoned abuts the edge of Recorded Monument SL014-01201 (Enclosure), not allowing for the provision of a buffer zone. Reference is made to policies P-AH-1 and P-AH-5.

Opinion

1 and 2. The proposed additional text would substantially modify the policies concerned. No material changes to policies and objectives can be made at this stage in the preparation of the new SEDP 2010-2016. It should be noted, however, that the protection of the context, amenity, landscape integrity and inter-visibility between Cairns Hill, Knocknarea and Carrowmore are addressed in Section 13.1.4 Strategic Environmental Assessment (SEA) mitigation policies. The policies contained in this section are to be integrated into the main body of archaeological policies upon adoption of the new Plan.

3 and 4. Although extensive buffer zones have not been indicated around all monuments in the North Fringe area, it is considered that the monuments in question are afforded sufficient protection by the archaeological heritage policies and objectives contained in Section 13.1 of the Draft SEDP. Issues such as ground works or landscaping in the vicinity of recorded monuments can be suitably addressed through the development management process.

Recommendation

No change to the Draft Plan is recommended.

Submission no. LSDP-7

28 April 2009

John Gallagher

RPS Item no. 273

SBC

Issue no. 1

This submission contends that the building listed as Draft RPS item no. 273 holds no architectural features and requests that the property be inspected and an opinion be given as to its merit.

Opinion

The building is currently a protected structure in the RPS 2004-10. It is proposed to retain this structure on the RPS 2010-16.

The structure has been given a regional rating in the National Inventory of Architectural Heritage (NIAH) based on its architectural and artistic interest.

The NIAH appraisal for the building is as follows: *This property, located at a change of height in the terrace, is part of a coherent two-storey group which extends to the east. It contains a well-designed, mostly original, shop front with particularly interesting ironwork above the shop front cornice. Original sash windows survive at first floor.*

The DoEHLG's *Architectural Heritage Protection – Guidelines for Planning Authorities* advise that deletions of structures from the RPS will only take place where the planning authority considers that the protection of a structure, or part of a structure, is no longer warranted. This will generally take place only when the structure has entirely lost its special interest value through major accident or where new information has come to light which proves that the special interests value was mistakenly attributed.

Based on the above appraisal from the NIAH and consideration of the submission and subject building by the planning authority, it is considered that the building merits protected structure status and the DoEHLG criteria for the deletion of a structure from the RPS have not been met in this case.

Recommendation

No change to the Draft RPS is recommended.

5. Manager's supplementary recommendations

Manager's Supplementary Recommendation no. 1

Proposed Amendments no. 20 and no. 87

T2.11 represents a connection between the R287 (old N4 between the Carrowroe roundabout and the Retail Park Roundabout), east to Cairns Road (L-3602-0), with a link to the Green Road (L-36022-0), and from there north and east to Tonaphubble Road (L-36025-0). The proposed road is necessary to facilitate any future development in the area, in particular south of Carrowroe Retail Park and north-west of Cairns Hill. It will relieve existing congestion at the junction of Pearse Road and Cairns Road (L-3602-0) at Markiewicz Park. It will provide access from the south to housing estates east of the Pearse Road (Ferndale, Markiewicz Heights, Greenfort Estate, Woodtown Lodge etc.). The provision of this link road will avoid the future potential need to reopen a route through existing estates in the area.

Archaeology and historical monuments, topography and visual amenity have been taken into consideration in choosing the line for the proposed road.

Of particular importance is the southern end of this proposed road, linking the R287 (old N4 between the Carrowroe roundabout and the Retail Park Roundabout), east to Cairns Road (L-3602-0), with a link to the Green Road (L-36022-0). The provision of this section of the T2.11 will not impact on the archaeology and historical monuments, topography or visual amenity of the area.

The road objective T2.11, together with all text references and the line on the Transportation Map, should be retained in Section 10.3 Intra-urban roads.

The Proposed Amendments no. 20 and no. 87 should not be adopted.

Manager's Supplementary Recommendation no. 2

Proposed Amendment no. 48

Domestic water charges represent a national issue and it will ultimately be the government's decision whether or not to introduce such charges.

It is not considered appropriate to include the proposed amendment in the SEDP as an attempt to preempt national policy, which will take precedence in any case.

The objective O-WS-4 in Section 14.1 Water supply should be deleted in its entirety.

The Proposed Amendment no. 48 should not be adopted.

Manager's Supplementary Recommendation no. 3

Proposed Amendment no. 74

The site subject to the Proposed Amendment is currently zoned as OS/open space in accordance with the SEDP 2004-2010, with an objective (E14) to maintain the natural wetland characteristics of the lands.

At pre-draft consultation stage, Mr. O'Connor made a request to have the lands zoned as WILT. This request was rejected in the First Manager's Report and accordingly the lands were zoned as OS/open space in the proposed Draft SEDP 2010-2016 when originally submitted to the elected members. At this stage however, the members of Sligo County Council passed a motion to have some of the lands zoned WILT, apparently on the basis that this portion of land had been filled and was no longer a wetland.

Consequently, in the Draft SEDP 2010-2016 it was proposed to zone a portion of these lands WILT, while the remainder was left OS/open space. Mr. O'Connor again made a submission requesting that the entire landholding be zoned WILT, which resulted in the Proposed Amendment no. 74.

On inspection of these lands, and contrary to assertions made when the Draft SEDP was originally presented to the members, it was found that no part of the lands had been filled and they remain as wetlands. It is strongly recommended that in the SEDP 2010-2016, the subject lands retain the OS/open space zoning as in the current SEDP 2004-2010. The natural wetland characteristics of the land should be retained and the lands should not be zoned for development.

The Proposed Amendment no. 74 should not be adopted.

Manager's Supplementary Recommendation no. 4

Proposed Amendment no. 82

In his Submission no. 130 on the Draft SEDP, D. Chambers requested that a portion of land along Rathbraughan Line be zoned for low-density residential development whilst allowing for the provision of walkways along the river at the northern boundary of these lands. This request resulted in the Proposed Amendment no. 82.

While there is clearly no need to zone additional land for residential development, as there are already 280 ha of greenfield land zoned for residential use, the subject lands also form part of a proposed linear park, the principal open space area within the North Fringe, and therefore should be retained as open space.

The Proposed Amendment no. 82 should not be adopted.

Manager's Supplementary Recommendation no. 5

Proposed Amendment no. 63

The text of the proposed Section 16.8 Development Management and access to National Primary Roads N4, N15 and N16 relates in fact to national and non-national roads. It is considered that both the title and the references in the text of the proposed section should reflect this fact.

It is recommended that the proposed amendment be modified as follows (new text in green, text to be deleted is crossed out):

16.8 Development Management and access to ~~National Primary Roads N4, N15 and N16~~ the road network

National roads play a strategic role in catering for inter-urban and inter-regional transport. They support Ireland's economy by providing faster, more efficient and safer access to and from our major ports,

airports, cities and large towns. In order to protect the carrying capacity, operational efficiency and safety of national roads, development accessing onto the N4, N15 and N16 will be restricted in accordance with the National Roads Authority's publication *Policy Statement on Development Management and Access to National Roads*. This document sets out official government policy objectives in relation to national roads.

Some development proposals will generate significant additional trips/travel, with potentially serious implications for the capacity and safety of ~~national roads and adjoining local roads~~ the access roads and the road network. In these cases, applications shall be accompanied by:

- a Traffic and Transport Assessment (TTA), in accordance with the DoEHLG/DoT/DTO publication *Traffic Management Guidelines* and the NRA's *Traffic and Transport Assessment Guidelines*,
- a Road Safety Audit (RSA), in accordance with the NRA's *Design Manual for Roads and Bridges* and Department of Transport Guidelines.

The planning authorities and/or prescribed bodies will assess the need for submission of such studies on a case-by-case basis.

In order to mitigate against noise impacts on developments within the zone of influence of existing or planned national roads, the requirements of S.I. No. 140 of 2006 Environmental Noise Regulations shall be adhered to in the design of relevant development proposals.

Manager's Supplementary Recommendation no. 6

In Chapter 16, subsection 16.6.2 Entrances should be updated by including the following text:

The minimum sight distance required for entrances onto roads shall be in accordance with the NRA Design Manual for Roads and Bridges, which are broadly as follows:

Speed of major road (km/h)	Sight distance required (m)
42	50
50	70
60	90
70	120
85	160
100	215

6. List of persons and organisations who made submissions on the Proposed Amendments to the Draft SEDP

Ref. No.	Date received	Name or agency	on behalf of (where applicable)	Address
1	22/08/2009	Seamus Kealy		Old Cartron, Sligo ggg
2	26/08/2009	Jude Clancy		Caltragh, Sligo
3	26/08/2009	Bernadette Gilroy		Loughanelton, Calry, Co. Sligo
4	26/08/2009	Justin Knecht		Carrownagilta, Drumnacool, Co. Sligo
5	26/08/2009	Orla McCarrick		Achonry, Tubbercurry, Co. Sligo
6	26/08/2009	Carmel McNamee		Knockadoo, Coolaney, Co.Sligo
7	26/08/2009	Deidre O'Rourke		
8	26/06/2009	Tommy Reilly		37 Oyster Bay, Rosses Point, Sligo
9	26/08/2009	Aisling Ryan		"Arroyo De La Miel", The Green, Holycross, Thurles, Co. Tipperary
10	26/08/2009	Dr. Perry Share		Head of Department of Humanities, Institute of Technology, Sligo
11	26/08/2009	John Warren		Achonry, Tubbercurry, Co. Sligo
12	27/08/2009	Kathleen Cox		Drumcliffe, Co. Sligo
13	27/08/2009	Karl Willems		Sligo
14	31/08/2009	Anne Clare Kubican		24 Stella Maris, Ballysadare, Co. Sligo
15	02/09/2009	Máire McCallion		Carrowdurneen, Skreen, Co.Sligo
16	09/09/2009	Imelda Condon, Higher Executive Officer	Department of Transport	Management Services Unit, 25 Clare Street, Dublin 2

Ref. No.	Date received	Name or agency	on behalf of (where applicable)	Address
17	09/09/2009	Maureen Crossan		
18	09/09/2009	Denise Rushe		3 Scarden Court, Strandhill Road, Sligo
19	10/09/2009	Gene Ward MPSI		O'Connell Street, Sligo
20	14/09/2009	Clíona Corry, Murray O'Laoire ARchitects	Mangan Bros Holdings	Merriman House, Brian Merriman Place, Lock Quay, Limerick
21	14/09/2009	Feargus Callagy		Cosystoves.com
22	14/09/2009	Hilary Feeney		
23	14/09/2009	Eugene Gillespie and Paul Jennings		Old Market Street and 14 High Street, Sligo
24	14/09/2009	Kevin Quinn Jr		5 Inisfree Court, Tonaphubble, Sligo
25	15/09/2009	Karen Burns		Ballinamona, Calry, Co. Sligo
26	15/09/2009	Una L'Estrange		
27	15/09/2009	Gerard Moore		General Manager, Sligo Park Hotel, Pearse Road, Sligo
28	15/09/2009	Jim O'Sullivan		69 Rathedmond, Sligo
29	15/09/2009	William Robertson		Lisheen, Rathgran, Coolaney, Co.Sligo
30	15/09/2009	Tony Wehrly	_Wehrly Bros	2/3 O'Connell Street, Sligo.
31	15/09/2009	Mark Whittaker, McCarthy Keville O'Sullivan	Shafin Developments	McCarthy Keville O'Sullivan, Block 1, G.F.S.C., Moneenageisha Road, Galway.
32	16/09/2009	Mark Barr		
33	16/09/2009	Aisling Blake		

Ref. No.	Date received	Name or agency	on behalf of (where applicable)	Address
34	16/09/2009	Annette Boland		
35	16/09/2009	Michelle Butler		
36	16/09/2009	Michael Caheny		Caheny's Bar, Mail Coach Road, Sligo
37	16/09/2009	Jaimie Carswell		Sligo
38	16/09/2009	Liam Cashell		
39	16/09/2009	Ann Clinton		Mail Coach Road, Sligo
40	16/09/2009	John Comiskey		Cranmore Drive, Sligo
41	16/09/2009	Gerry Conway supported by petition with 250 signatures	Eason and customers	45 O'Connell Street, Sligo
42	16/09/2009	Gerry Conway supported by petition with 45 signatures	The Traders of O'Connell Street	45 O'Connell Street, Sligo
43	16/09/2009	Hedda Dick		
44	16/09/2009	Catherine Dillon		242 Sunset Drive, Cartron Point, Sligo
45	16/09/2009	Stephanie Dillon, John Spain Assocs	Aldi Stores (Ireland) Ltd.	ohn Spain Associates, 10 Lower Mount Street, Dublin 2
46	16/09/2009	Emer Gillen		Elemis Ltd, 10 Haunch of Venison Yard, Mayfair, London
47	16/09/2009	Teresa Halloran	Development Applications Unit, DoEHLG	
48	16/09/2009	Roger Leahy		
49	16/09/2009	Eddie Lee		Sligojazz.ie

Ref. No.	Date received	Name or agency	on behalf of (where applicable)	Address
50	16/09/2009	Laura Mannion		Drury.ie
51	16/09/2009	Eugene Monaghan		
52	16/09/2009	Ben McCafferty		Davislangdon.com
53	16/09/2009	Ciaran McCaffrey		
54	16/09/2009	Joe McCann, Chairperson	Sligo Shopping Centre Traders Association	Wine Street Car Park, Sligo
55	16/09/2009	Gerry McCanny		
56	16/09/2009	Suzy McCanny		Suzymccanny.com
57	16/09/2009	John McCormack	McCormack Fuels,	McCormack Fuels, Mail Coach Road, Sligo
58	16/09/2009	Michael Egan	National Roads Authority	Nra.ie
59	16/09/2009	David McDermott		
60	16/09/2009	Brian Kenny	Spatial Policy Section, DoEHLG	Environ.ie
61	16/09/2009	Seána McGearry	Coordination Unit, Department of Communications, Energy & Natural Resources	Elm House, Earlsvale Road, Co. Cavan
62	16/09/2009	Eugene McGloin	Doorly Park/Martin Savage/Garavogue - Hazelview Campaign Committee, East Ward, Sligo Town 2009	Doorly Park/Martin Savage/Garavogue - Hazelview Campaign Committee, East Ward, Sligo

Ref. No.	Date received	Name or agency	on behalf of (where applicable)	Address
63	16/09/2009	Robert McLoughlin, GVA Planning	Tesco Ireland Ltd.	GVA Planning and Regeneration Ltd, Second Floor, Seagrave House, 19-20 Earlsfort Terrace, Dublin 2
64	16/09/2009	Louis McManus, James Hanrahan & Arlo Ledd	People's Petition (O'Connell Street Petition), 2560 signatures	95 St. Brigid's Place, Sligo
65	16/09/2009	Johanna Moran		
66	16/09/2009	John Murphy, Brian Meehan & Assocs	Newbay Doherty Group	44 Fitzwilliam Place, Dublin 2
67	16/09/2009	Felim O'Rourke		Economics Department, Sligo I.T., Ballinode, Sligo
68	16/09/2009	Mella O'Rourke		
69	16/09/2009	Seanan O'Rourke		
70	16/09/2009	Fergal Quinn		Acushla Ltd., JFK Parade. Sligo
71	16/09/2009	Paul Reidy		
72	16/09/2009	Maggie Ryan		Santa Fe, NM, USA
73	16/09/2009	Brian Vickers		Compupac.ie
74	16/09/2009	Richard Wehrly		Strandhill, Co.Sligo

Late submissions on the Proposed Amendments to the Draft SEDP

Ref. No.	Date received	Name or agency	on behalf of (where applicable)	Address
L1	17/09/2009	Barry Carty		
L2	17/09/2009	John Galvin		Carrowroe, Sligo
L3	17/09/2009	Juani Garcia		
L4	17/09/2009	John Kavanagh		
L5	17/09/2009	Donal O'Kelly		Sligo