



Sligo County Council  
Comhairle Chontae Shligigh

**Sligo.**



**SECOND**  
**Chief Executive's Report**  
on submissions and observations  
to the **Draft Sligo CDP 2024-2030**

**Volume 1**

Sligo County Council  
**Development  
Planning Unit**

22 March 2024



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# 1. Introduction

## 1.1. Preparation of a new Development Plan – progress to date

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

Four years after adopting the CDP 2017-2023, Sligo County Council commenced the review of its Development Plan in 2021. In 2022, the duration of the CDP 2017-2023 was extended by up to 12 months, to July 2024.

A proposed Draft Sligo CDP 2024-2030 was circulated to the elected members on 14 September 2023. At a special meeting on 2 October 2023, the Members approved the Draft CDP for publication, without modifications.

The Draft Plan and accompanying documents were published on 13 October 2023 on the Council's consultation portal [consult.sligococo.ie](https://consult.sligococo.ie), with hard copies sent to all County Library branches and Council Area Offices. The public consultation was extensively advertised on social media, in addition to the newspaper notices.

The Council invited the public and the prescribed bodies to make submissions on the Draft Plan during the 10-week consultation period, which ended on 22 December 2023. During the consultation period, six public meetings were held in Sligo Town, Ballymote, Enniscrone, Tobercurry and Carney. Planners present at these meetings answered questions, clarified issues and advised the attendees how to make valid submissions on the Draft Plan.

A total of **211 valid submissions** were received by the consultation deadline. All submissions were published on the Council's consultation website and remain available to read or download from <https://consult.sligococo.ie/en/node/883/submissions>

## 1.2 Second Chief Executive's Report – statutory framework

**Section 12(4) of the Planning and Development Act 2000 (as amended)** requires the Chief Executive of a Planning Authority to prepare a report on submissions received in relation to the Draft Development Plan and submit it to the elected members for their consideration.

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

- a. list the entities or persons who made submissions or observations;
- b. provide a summary of the following:
  - the "recommendations, submission and observations" made by the Office of the Planning Regulator;
  - the submissions and observations made by any other person.

- c. give the response of the Chief Executive to the issues raised, taking account of the proper planning and sustainable development of the area, the statutory obligations of the local authorities in the area and any relevant policies or objectives for the time being of the Government or of any Minister of the Government

The **Development Plan Guidelines for Planning Authorities** (2022) clarify that the submission of the OPR must be presented at the start of the Report.

After the OPR, the Chief Executive's Report must also provide a summary of any issues raised and recommendations received from **the Minister** (for Housing, Local Government and Heritage) and the relevant **Regional Assembly** (Northern and Western Regional Assembly), outlining the manner in which these should be addressed in the development plan.

All other submissions are to be summarised and addressed in a clear and succinct manner, to facilitate consideration by the elected members.

## 1.3 Structure of this Report

The **Second Chief Executive's Report** consists of two volumes and two appendices. The contents of the volumes and appendices are detailed below.

### Volume 1

**Section 2** of the Report presents an **Executive Summary**, which outlines the main issues raised in submissions.

**Section 3** contains the **List of persons and organisations that made submissions on the Draft Plan**, highlighting those submissions addressed in **Volume 1** of the Second Chief Executive's Report.

**Section 4** of this report contains the full text, recommendations, observations and advice received from the **Office of the Planning Regulator** (Submission 184), together with the Chief Executive's response and recommendations for changes to the Draft Plan.

**Section 5** addresses the issues raised in the **Northern and Western Regional Assembly's submission** (103) which also contains recommendations and observations, similar to the OPR submission.

**Section 6** addresses the nature conservation and archaeology-related issues raised by the **Development Applications Unit (DAU)** on behalf of the **Minister for Housing Local Government and Heritage** (Submission (124), which also contains recommendations and observations.

**Section 7** of this report presents the summaries of submissions received from **prescribed bodies**, other than the OPR, NWRA and Minister for DHLGH. The Chief Executive's response and recommendations are presented after each issue of each submission.

**Section 8** addresses the issues raised in three submissions received from **elected members of Sligo County Council** (Submissions 100, 156 and 180).

**Section 9** includes two sets of supplementary recommendations made by the Chief Executive after internal consultations with the Sligo Regional Design Office and the Environment Section of Sligo County Council.

A third set of recommendations relates to changes required to comply with the recently published **Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities** (SRDCS Guidelines – 15 January 2024).

A fourth set of recommendations relates to **miscellaneous issues**.

## Volume 2

The second volume of the Report consist of summaries of submissions, other than the ones addressed in Volume 1, together with the Chief Executive's response and recommendation to each significant issue raised in each submission.

The submissions are addressed in their numerical order, which corresponds to the chronological order of uploading them to the Council's Consultation Portal. For ease of identification, each submission number is accompanied by the name of the person, group or company who made that submission.

All summaries of submissions include a link to the Portal, to facilitate the viewing or downloading of the integral versions, as uploaded, e-mailed or posted to the County Council during the consultation period.

All sites subject to rezoning requests are shown on settlement **Submissions Maps**, each site marked with the number of the corresponding submission.

There are 25 Submissions Maps included in Volume 2 of this Report, three of these relating to Sligo Town (centre-western, centre-eastern and southern part of the town).

**Appendix 1** contains the lists of **text amendments** to the relevant chapters/sections of the Draft Plan, as recommended by the Chief Executive on the basis of submissions and internal consultations.

**Appendix 2** contains a set of **20 maps showing the zoning amendments** recommended by the Chief Executive in those settlement where rezoning requests have been considered acceptable or required by modifications/corrections to flood zone boundaries.

## 1.4 Format of the Chief Executive's recommendations

Having summarised the issues raised in each submission, the Chief Executive expresses an opinion and makes a recommendation on whether to modify the Draft CDP or make no changes.

Each recommendations follows the same format: **CE-XY-QW**, where "CE" stands for Chief Executive, "XY" is the Chapter number and "QW" is the number of the amendment proposed to the Chapter, in ascending order.

For example, if the Chief Executive proposed an amendment to the first paragraph in Chapter 3, the recommendation would be coded **CE-03-01**. Similarly, the fourteenth amendment to Chapter 30 would be coded **CE-30-14**.

A Chief Executive-recommended zoning amendment would be coded in the same manner, with an added **Z** after the chapter number – **CE-11Z-05**, representing the fifth zoning amendment relating to Chapter 11 Sligo Town.

Where it is proposed to modify the text of the Draft CDP, this is indicated as follows:

**text proposed to be added is shown in blue like this**

**text proposed to be deleted is shown in red like this**

Where it is recommended to change the zoning of a site, reference is made to the submission number as marked on the Submissions Map for the relevant settlement.

## 1.5 The role of the elected members

Deciding whether to propose amendments to the Draft Plan is a function reserved for the elected members of Sligo County Council. Following the receipt of this Chief Executive's Report, the members have up to 12 weeks to make a decision regarding the Draft Plan.

On foot of the submissions received, and on review of the content of the Draft Plan, the Chief Executive has recommended some minor modifications, but also a number of material (i.e. significant) alterations. If the members decide – by resolution – that these or other material alterations should be made to the Draft Plan, the resulting proposed amendments must be subject to a further (final) round of public consultation.

**At this stage, the Members are required to consider all of the following:**

- The Draft CDP – Volumes 1 to 4
- The Environmental Report (SEA);
- The Natura Impact Report (AA);
- The Strategic Flood Risk Assessment Report (SFRA);
- The Chief Executive's recommendations contained in this Report.

The Planning and Development Act 2000 (as amended) indicates the following:

“Where, following the consideration of the draft development plan and the chief executive's report, it appears to the members that the draft should be accepted or amended ... they may, by resolution, accept or amend the draft and make the development plan accordingly” (S. 12 (6))

“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))

## 1.6 What happens next?

If the Members decide, by resolution, to accept the Draft Plan as it is, or to make only minor modifications (i.e. not significant, material alterations), the new development plan can be adopted.

If the Members decide, by resolution, to make material amendments to the Draft Plan, these proposed amendments must go on public display for a period of at least four weeks, but only after they are assessed for potential environmental impacts.

### **Determination of requirement for SEA and AA**

Section 12(7) of the Planning and Development Act 2000 (as amended) indicates that the Planning Authority must determine if a strategic environmental assessment or an appropriate assessment or both such assessments are required to be carried out in respect of the proposed material alterations of the Draft Plan.

If it is determined that such environmental assessments are required, the Chief Executive must specify the period considered necessary to carry out the assessments.

Within two weeks after a making the above-mentioned determination, the Planning Authority must issue a public notice indicating how long it will take to carry out the environmental assessments.

## **Environmental assessment of the Proposed Amendments**

The Development Planning Unit will ensure that the relevant assessments are carried out in respect of the amendments subject to resolutions passed by the elected members. The assessments will result in Addenda to the environmental reports. **These Addenda must be published together with the proposed amendments for public consultation.**

Where it is determined that one or more proposed amendments have the potential for significant environmental impacts, such impacts must be mitigated. To this end, it may be necessary for the Chief Executive to recommend specific mitigation policies to be included along with the relevant amendments.

Where mitigation is not possible, the Chief Executive will be obliged to recommend that the relevant amendment is omitted from the final Plan.

The Chief Executive's recommendations for mitigation or omission will be published together with the Proposed Amendments.

## **Publication of the Proposed Amendments**

The Proposed Amendments and the Addenda to the environmental reports must be placed on public display for a period of four weeks (minimum).

The Planning Authority will issue a public notice, inviting the public and prescribed bodies to participate in the final round of consultation. All submissions received during the third public consultation phase will be summarised in the Third Chief Executive's Report.

After considering the proposed amendments and the Chief Executive's recommendations on the issues raised during the third phase of consultation, the Members will finally adopt the Development Plan, which will become operational six weeks later.

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

## Development Plan process

1. *Give notice of Development Plan review to the public and the prescribed bodies (30 July 2021)*
2. *Pre-draft consultation (30 July to 24 September 2021)*
3. *First Chief Executive's Report on submissions and observations submitted to members (22 December 2021)*
4. *Members direct the Chief Executive to prepare the Draft CDP 2023-2029 (7 March 2022)*
5. *Preparation of Proposed Draft Plan*
6. *Consideration of Proposed Draft Plan by members (September-October 2023)*
7. *Members accept the Proposed Draft Plan (2 October 2023)*
8. *Give notice of publication of the Draft Plan to the public and the prescribed bodies (10-12 October 2023)*
9. *Draft Plan on public display for over 10 weeks (13 October to 22 December 2023)*
10. *Second Chief Executive's Report on submissions and observations submitted to members (22 March 2024)*
11. *Members may wish to amend the Draft Plan or accept the Manager's recommendations and make the Plan without further amendments*
12. If the proposed amendments are a material alteration of the Draft Plan, publish notice (additional time will be required for carrying out SEA and AA of the proposed amendments)
13. Put the proposed amendments on public display and invite submissions (minimum four weeks)
14. Third Chief Executive's Report on submissions and observations submitted to members
15. *Members make the Plan with or without the proposed amendments*
16. Publish notice that the new Plan is made
17. The new CDP becomes operational six weeks after its adoption

## Section 2.

### Executive Summary

#### 2.1 Public consultation on the Draft Development Plan

During the public consultation period, which started at 9 a.m. on 13 October 2023 and ended at 4 p.m. on 22 December 2023, a total of 212 submissions were received. One submission (no. 26 – highlighted in grey in the List contained in Section 3 of this Report) was withdrawn, leaving 211 valid submissions.

#### 2.2 Prescribed Bodies' submissions

Before commencing public consultation on the Draft Sligo CDP 2024-2030, the Development Planning Unit of Sligo County Council notified twenty-nine (29) authorities prescribed by the Planning Regulations (Art. 13) for the purposes of Section 11, 12 and 13 of the Planning and Development Act 2000 (as amended).

Only sixteen Prescribed Bodies returned comments on the Draft Plan, including the Office of the Planning Regulator, the NWRA and the Department of Housing, Local Government and Heritage.

The most comprehensive submissions were received from Uisce Éireann, ESB and Transport Infrastructure Ireland, all containing valuable up-to-date information and useful suggestions for amendments to the Draft Plan.

#### 2.3 OPR and NWRA submissions

The OPR and the NWRA made largely positive submissions, containing a relatively small number of recommendations (OPR- 5 recommendations, NWRA – 9 recommendations) and observations (OPR – 7 observations, NWRA – 6 observations). These have resulted in the adjustment of housing and population figures for Sligo Town, as well as additional sections such as **Monitoring the implementation of Plan objectives**.

#### 2.4 Submissions received from the public

Of the 211 valid submissions, 195 were made by individuals, community groups, business organisations, developers and planning consultants. Issues were raised mainly in relation to housing, transport, cycle routes, energy, landscape, tourism and zoning.

#### 2.5 Ballymote transport issue

An unexpectedly high number of submissions are opposing the proposal to build a new road in Ballymote (objective BM-TC0-5). Twenty-four (24) submissions were received from local residents who object to the proposed creation of a link road from the R-293 to the Primary Care Centre through two separate housing estates, on the grounds that such a road will make the area unsafe for children to play outside.

## 2.6 Local Transport Plan

The Draft Local Transport Plan also attracted comments, and seven (7) submissions were made on the topic of segregated cycle routes, in particular from Strandhill to Rosses Point. Two of these submissions contained detailed analyses of transport infrastructure within Sligo Town and of the LTP provisions.

## 2.7 Wine Street Car Park Masterplan

There was also interest in the Wine Street Car Park Masterplan, which was the subject of four submissions. Three of these submissions, made by stakeholders / property owners in the area, focused entirely on the Wine Street Car Park Masterplan, while the fourth also mentioned other issues.

## 2.8 Zoning submissions

Over 100 submissions raised issues related to the proposed zoning of land. Rezoning requests have been received for sites located in 25 settlements, mostly in the following:

**Sligo Town** – 28 zoning submissions

**Enniscrone** – 15 zoning submissions

**Strandhill** – 13 zoning submissions

**Ballymote** – 6 zoning submissions

**Tobercurry** – 6 zoning submissions

**Ballygawley** – 5 zoning submissions

In relation to the **Town and Village Plans included in Volume 2 of the Draft CDP**, the Chief Executive has recommended zoning amendments in eleven settlements.

In relation to the **Village Plans included in Volume 4 of the Draft CDP**, the Chief has recommended zoning amendments in nine settlements.

## 2.9 Supplementary recommendations

Following internal consultation with relevant departments of the County Council and the publication of the **Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities** (DHLGH, January 2024), the Chief Executive has decided to recommend supplementary amendments. These are grouped under the headings **Transport, Water Quality, Supplementary recommendations arising from the SRDCS Guidelines** and **Miscellaneous Issues**.

## 2.10 Recommended amendments

On foot of the 211 valid submission received, and having regard to internal consultations and the new Sustainable Residential Development and Compact Settlement Guidelines, the Chief Executive has recommended **195 amendments to the narrative, policies and objectives** of the Draft Plan, **42 amendments to zoning**, **four amendments to the LTP**, **ten amendments to the SFRA** and the inclusion of an **additional set of maps** ("Objectives Maps") for specified settlements.

## Section 3.

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

The public consultation commenced on 13 October 2023 and ended on 22 December 2023.

The **sixteen (16) submissions made by Prescribed Bodies** (highlighted in yellow) and the **three (3) submissions made by elected members of Sligo County Council** (highlighted in green) are addressed in **Volume 1** of this Report.

All other submissions are addressed in **Volume 2** of the Report, in numerical order.

Ref. no.	Date received	Name of person who signed the submission	on behalf of (where applicable)	Types of issues raised
1	25 October	<b>Geoff Hynes</b> Inspector, COMAH, Chemical Production & Storage (CCPS)	<b>Health and Safety Authority</b>	Major accident hazard sites (Seveso)
2	16 November	<b>Seamus and Kathleen Leonard</b>	n/a	Rezoning in Enniscrone
3	16 November	<b>Barry O'Sullivan and Dearbhla Carty</b>	n/a	Rezoning in Ballintogher
4	20 November	<b>Fr Joseph Hogan</b> , parish priest of Dromore West	People of the Parish, Parish council and various committees	Broadband in Dromore West
5	24 November	<b>Keith Carty</b>	n/a	Rezoning in Ballinafad
6	28 November	<b>John O'Malley</b>	n/a	Rezoning in Ballymote
7	29 November	<b>RMLA Planning Consultants</b>	<b>An Post</b>	Flexibility in zoning objectives
8	4 December	<b>Orla Carew</b>	<b>Elizabeth Banningan, Paula Carew, Orla Carew</b>	Rezoning in Strandhill
9	5 December	Name not stated	<b>Department of Transport</b>	Request to insert "inter-urban" in a sentence
10	5 December	<b>Patrick Maughan</b>	n/a	Rezoning in Enniscrone

Ref. no.	Date received	Name of person who signed the submission	on behalf of (where applicable)	Types of issues raised
11	7 December	<b>Brid Kelly</b>	n/a	Rezoning in Cliffony
12	8 December	<b>Patrick Maughan</b>	n/a	Rezoning in Enniscrone
13	9 December	<b>Noel Raftery</b>	n/a	Dune conservation plan in Strandhill
14	9 December	<b>Noel Raftery</b>	n/a	Positive comments
15	9 December	<b>Noel Raftery</b>	n/a	Circulation in Sligo Town
16	9 December	<b>James O'Connor</b>	n/a	Right-of-way in Ballysadare
17	9 December	<b>James O'Connor</b>	n/a	Unauthorised roadside signage
18	9 December	<b>Aidan Doyle, CEO</b>	<b>Sligo Chamber of Commerce</b>	Rezoning in Sligo Town, other issues
19	8 December	<b>Lee Kelly</b>	<b>EPA, SEA Section, Office of Radiation Protection and Environmental Monitoring</b>	Standard comments
20	8 December	<b>Declan Byrne (Director) and Terrence McGowan</b>	<b>DAT Property Development Limited</b>	Rezoning in Strandhill
21	11 December	<b>Roger McCarrick</b>	n/a	Rezoning in Tobercurry
22	12 December	<b>Rosarie Perry</b>	n/a	Rezoning in Bunnannadden
23	12 December	<b>John and Marie Perry</b>	n/a	Rezoning in Ballymote
24	12 December	<b>Michael Conmy (Bury Architects)</b>	<b>Blackmud Developments Limited</b>	Rezoning in Sligo Town
25	13 December	<b>Michael Conmy (Bury Architects)</b>	<b>Fergal Cawley</b>	Rezoning in Enniscrone
26	13 December	<i>n/a – submission withdrawn</i>	<i>n/a</i>	<i>n/a</i>
27	14 December	<b>Ceola McLynn</b>	n/a	Cycle routes and Local Transport Plan (LTP)

<b>Ref. no.</b>	<b>Date received</b>	<b>Name of person who signed the submission</b>	<b>on behalf of (where applicable)</b>	<b>Types of issues raised</b>
28	13 December	Michael McGoldrick	"Traders' Row"	Wine Street Car Park Masterplan
29	14 December	Frank Mulrennan	n/a	Rezoning in Enniscrone
30	14 December	Padraic Boylan	n/a	Footpaths in Ballymote
31	15 December	Fiona Carty	n/a	Rezoning in Ballygawley
32	15 December	Peter Kinghan (Quarry Mineral consulting Ltd)	Harrington Concrete	Rezoning in Ballysadare
33	15 December	Brendan Kilrehill	n/a	Rezoning in Easky
34	15 December	Joseph Dunphy	n/a	Rezoning in Easky
35	16 December	Michael Kirby	Drumcliffe-Rathcormac Tidy Towns Committee	Conservation Plan, walking and cycling infrastructure
36	16 December	Michael Kirby	Drumcliffe-Rathcormac Tidy Towns Committee	Walking and cycling infrastructure
37	16 December	Declan McTiernan	n/a	Proposed road in Ballymote
38	16 December	Pamela Davey	n/a	Proposed road in Ballymote
39	15 December	Ann McKirdy	n/a	Strandhill
40	16 December	Tess Cawley	n/a	Proposed road in Ballymote
41	16 December	Georgina Cawley	n/a	Proposed road in Ballymote
42	17 December	Mark Devaney	n/a	Proposed road in Ballymote
43	18 December	Seamus Gilligan	n/a	Rezoning in Sligo Town
44	18 December	Robert Keran (Director), Virtus (Consultants)	DMG Promotions Ltd	Rezoning in Ballysadare
45	18 December	Name not stated	Sligo Family Resource Centre	Structure in Sligo Town

<b>Ref. no.</b>	<b>Date received</b>	<b>Name of person who signed the submission</b>	<b>on behalf of (where applicable)</b>	<b>Types of issues raised</b>
46	18 December	<b>Brendan Flanagan</b>	n/a	Rezoning in Sligo Town
47	18 December	<b>Michael McCormack, Senior Land-use Planner</b>	<b>TII</b>	National roads
48	18 December	Unnamed consultants	<b>RCEH Trust</b>	Rezoning in Bellaghy
49	18 December	<b>Liam Lipsett</b>	n/a	Rezoning in Coolaney-Rockfield
50	19 December	<b>Michael Conmy, Bury Architects</b>	<b>Shane Scott</b>	Rezoning in Enniscrone
51	19 December	<b>Keith Henry</b>	<b>Local residents from Ballymote</b>	Proposed road in Ballymote
52	19 December	<b>Michael Conmy, Bury Architects</b>	<b>Sarah Coleman</b>	Rezoning in Enniscrone
53	19 December	<b>Keith Henry</b>	n/a	Ballymote
54	18 December	<b>Breana Coyle, Jennings O'Donovan</b>	<b>Sligo North West Airport Company Limited</b>	Rezoning in Strandhill
55	19 December	<b>Cathal McMunn</b>	n/a	Rezoning in Sligo Town
56	19 December	<b>John Tuffy</b>	n/a	Rezoning in Enniscrone
57	19 December	<b>Brendan and Patricia Armstrong</b>	n/a	Ballygawley
58	19 December	<b>Sabine Conboy</b>	n/a	Ballygawley
59	19 December	<b>Paul Harper</b>	n/a	Rezoning in Enniscrone
60	19 December	<b>Mark Gurren</b>	n/a	Landscape protection policies
61	19 December	<b>William Doherty</b>	n/a	Rezoning in Enniscrone
62	19 December	<b>MKO Consultants</b>	<b>Arthur Mullan and Mullan family</b>	Rezoning in Sligo Town
63	19 December	<b>Declan Oates</b>	n/a	Rezoning in Tobercurry

<b>Ref. no.</b>	<b>Date received</b>	<b>Name of person who signed the submission</b>	<b>on behalf of (where applicable)</b>	<b>Types of issues raised</b>
64	19 December	<b>Eamonn O'Dowd</b>	<b>Eddie Donaghy</b>	Rezoning in Sligo Town
65	19 December	<b>Lee Cawley</b>	n/a	Proposed road in Ballymote
66	19 December	<b>Jason Martin</b>	n/a	Proposed road in Ballymote
67	19 December	<b>Una L'Estrange</b>	n/a	LTP, cycle routes
68	19 December	<b>Colm Harte, Town Planner</b>	<b>Land Development Agency</b>	Housing policies
69	19 December	<b>Paul Brady</b>	<b>Lower Heatherview Residents Associations</b>	Rezoning in Sligo Town
70	19 December	<b>Jamie Kenny</b>	n/a	Proposed road in Ballymote
71	20 December	<b>Aoife Porter</b>	n/a	LTP, cycle routes
72	20 December	<b>Muirenn Duffy, Director, RMLA Planning Consultants</b>	<b>Tesco Ireland Limited</b>	Wine Street Car Park Masterplan
73	20 December	<b>Conor Galvin</b>	<b>OPW</b>	Flood risk assessment
74	20 December	<b>Robert Keran, Virtus Planning Consultants</b>	<b>Conor McEniff</b>	Rezoning in Ballincar
75	20 December	<b>Virtus Planning Consultants</b>	<b>Lewis and Niall Rhatigan</b>	Rezoning in Ballymote
76	20 December	<b>Mairead Garry</b>	<b>Department of Education, Forward Planning Section</b>	School provision
77	20 December	Name not stated	<b>Sligo Coastal Mobility Action Group</b>	Cycle routes
78	20 December	<b>John Spain, Managing Director, John Spain Associates</b>	<b>Aldi Stores (Ireland) Ltd.</b>	Rezoning in Sligo Town
79	19 December	<b>Pat Benson</b>	<b>Carraroe &amp; District Regeneration Association (CADRA)</b>	Transport, active travel

<b>Ref. no.</b>	<b>Date received</b>	<b>Name of person who signed the submission</b>	<b>on behalf of (where applicable)</b>	<b>Types of issues raised</b>
80	20 December	<b>Robert Keran, Virtus Planning Consultants</b>	<b>Michael Keane, Keane's Service Station</b>	Rezoning in Stranhill
81	20 December	<b>Killian Harkin</b>	n/a	Rezoning in Cliffony
82	20 December	<b>Declan McCabe, McCabe ARchitects</b>	<b>Aidan Gregory Feeney and Brendan Feeney</b>	Rezoning in Enniscrone
83	20 December	<b>Olivia Jones</b>	n/a	Cycle routes
84	20 December	<b>Martin Cassidy</b>	<b>Sophia Jonson</b>	Rezoning in Castlebaldwin
85	19 December	<b>Kevin Kelly</b>	n/a	Rezoning in Sligo Town
86	20 December	<b>Board of Management</b>	<b>S.N. Réalt na Mara, Rosses Point</b>	Active travel in Rosses Point
87	20 December	Name not provided	<b>SSE</b>	Renewable energy policies
88	20 December	Name not provided	<b>Saolta</b>	Sustainable development
89	20 December	<b>Eamonn O'Dowd</b>	n/a	Rezoning in Ballymote
90	20 December	<b>Deirdre and Gabriel Walsh (Deirdre Carolan)</b>	n/a	Proposed road in Ballymote
91	20 December	<b>Ricardo and Lisa de Gouveia</b>	n/a	Proposed road in Ballymote
92	20 December	<b>Barry Flynn</b>	n/a	Dromore West
93	20 December	Name not provided	<b>Sligo Traveller Support Group</b>	Traveller accommodation
94	20 December	<b>M. Flynn</b>	n/a	Rezoning in Dromore West
95	19 December	<b>Michael Haran</b>	n/a	Rezoning in Carney
96	20 December	<b>Darren Clancy</b>	<b>Andrew Alphonsus Brehony</b>	Rezoning in Ballymote
97	20 December	<b>Michael Conmy, Bury Architects</b>	<b>Michael O'Dowd</b>	Rezoning in Enniscrone

Ref. no.	Date received	Name of person who signed the submission	on behalf of (where applicable)	Types of issues raised
98	20 December	David Cullen	n/a	Pedestrian/cycle link in Strandhill
99	21 December	Bob Coggins	n/a	Cycle routes
100	19 December	Cllr Gerry Mullaney, Cllr Paul Taylor, Cllr Joe Queenan, Cllr Dara Mulvey, Cllr Michael Clarke, Cllr Thomas Healy, Cllr Thomas Walsh, Cllr Marie Casserly, Cllr Martin Connolly and Cllr Martin Baker	Sligo County Councillors Planning Group	Various issues
101	21 December	Johnny Gogan	n/a	Transport in Sligo Town
102	21 December	Michael Mac Aree, Head of Strategic Planning	NTA	LTP, other transport issues
103	21 December	Denis Kelly, Director	NWRA	Nine (9) recommendations and six (6) observations
104	21 December	Michael Conmy, Bury Architects	Aishling Munnelly	Rezoning in Dromore West
105	20 December	John Gallagher	n/a	Various issues
106	21 December	Stephen Barrett, Director, Tom Phillips + Associates	Tom Sheridan	Rezoning in Sligo Town
107	21 December	Eamonn O'Dowd	n/a	Rezoning in Sligo Town
108	20 December	Seamus Gilligan	n/a	Rezoning in Sligo Town
109	21 December	Colm Cummins, Group Property Planning Manager	ESB	Energy-related policies
110	21 December	Orla McCafferty, Project Planner, MKO	Michael McGoldrick	Rezoning in Sligo Town
111	21 December	Orla McCafferty, Project Planner, MKO	Rhodaville Ltd.	Wine Street Car Park Masterplan
112	21 December	Simon O'Dowd	Kieran Walsh	Rezoning in Ballintogher

Ref. no.	Date received	Name of person who signed the submission	on behalf of (where applicable)	Types of issues raised
113	21 December	<b>Sinead O'Reilly</b> , Arts Director, Multi-Disciplinary Arts	<b>Arts Council</b>	Placemaking, Arts and Culture
114	21 December	<b>Sinead O'Malley</b> , Planning Manager	<b>FuturEnergy Ireland</b>	Landscape protection policies
115	21 December	<b>Martin McGloin</b>	n/a	Rural house design guidance
116	21 December	<b>Brian Minogue</b> , Tom Phillips + Associates	<b>Bristow Ireland Ltd</b>	Rezoning in Strandhill
117	21 December	<b>Catherine O'Neill</b>	<b>Noel Higgins</b>	Rezoning in sligo Town
118	21 December	<b>Kalle and Kamila Conboy</b>	n/a	Ballygawley
119	21 December	<b>Elaine Heneghan</b> , Forward Planning, Asset Strategy an Sustainability	<b>Uisce Eireann</b>	Water services infrastructure
120	21 December	<b>Gerry Fox</b> , Operations Manager	<b>Sligo Tourism Development Association</b>	Rezoning in Sligo Town
121	21 December	<b>Stephen Barrett</b> , Director, Tom Phillips + Associates	<b>Tom Sheridan (TAHC)</b>	Cregg House
122	21 December	<b>James O'Hara</b>	<b>Kevin Maye</b>	Rezoning in Tobercurry
123	21 December	<b>Conall Doran</b>	n/a	LTP provisions
124	21 December	<b>Simon Dolan</b> , Executive Officer	<b>Development Applications Unit, DHLGH</b>	Nature conservation and archaeology
125	21 December	<b>Albert Conneally</b>	<b>Glenman Corporation (Daybleak Properties)</b>	Rezoning in Sligo Town
126	21 December	<b>Declan Oates</b>	n/a	Rezoning in Cliffony
127	21 December	<b>Robert Keran</b> , Virtus	<b>Sligo Rovers Football Club</b>	Rezoning in Sligo Town
128	21 December	<b>Martina Butler</b>	<b>Forthill Mens Group Art &amp; History Society</b>	Green corridor in Sligo Town
129	21 December	<b>John Bourke</b> , Policy Analyst	<b>Wind Energy Ireland</b>	Wind energy policies

<b>Ref. no.</b>	<b>Date received</b>	<b>Name of person who signed the submission</b>	<b>on behalf of (where applicable)</b>	<b>Types of issues raised</b>
130	21 December	James O Hara	Trevor Matthews	Rezoning in Tobercurry
131	21 December	William Britton	n/a	Rezoning in Sligo Town
132	21 December	Brendan Ward	n/a	Footpaths in Grange
133	21 December	Debbie Ormestone	Easky Enhancement Association	Easky Village Plan
134	21 December	Brendan Ward	n/a	Rezoning in Grange
135	21 December	Ken and Natasha Gallagher	n/a	Rathcormac development limit
136	21 December	Ken and Natasha Gallagher	n/a	Rezoning in Sligo Town
137	21 December	Tom Watters	n/a	Cliffony Village Plan
138	21 December	Jade Power, MKO Planning Consultants	Novot Holdings Limited	Rezoning in Sligo Town
139	21 December	Declan Gallagher	n/a	Rathcormac development limit
140	21 December	John Mullaney	n/a	Sligo Town Plan, tourism
141	21 December	Mel Casserly, Consulting Engineer	Martin Timoney	Rezoning in Cliffony
142	21 December	Julie Farrell	n/a	Cycle routes
143	21 December	No name provided	Sligo PPN	Transport, LTP
144	21 December	Matthew and Monica Kennedy	n/a	Rezoning in Curry
145	21 December	Patrick J Gallagher	n/a	Strandhill
146	21 December	Patrick Brennan	The Brennan family	Rezoning in Tobercurry
147	21 December	Ross and Eithne Oogan	n/a	Proposed road in Ballymote

Ref. no.	Date received	Name of person who signed the submission	on behalf of (where applicable)	Types of issues raised
148	22 December	Enda O'Brien	n/a	Rezoning in Sligo Town
149	22 December	No name provided	Sligo Cycling Campaign	Transport, LTP
150	22 December	No name provided	Planning Advisory Division, Department of Environment, Climate and Communications	Climate, energy, telecommunications
151	22 December	Michael Conmy, Bury Architects	Fergal Burke	Rezoning in Rosses Point
152	22 December	Vincent Hannon Architects	Carty Contractors Ltd.	Rezoning in Ballysadare
153	22 December	Laura McHugh	n/a	Cycle routes, LTP
154	22 December	MFA Consulting Engineers	Michael Scanlon	Rezoning in Ballysadare
155	22 December	Vincent Hannon Architects	Carnarvon Ltd	Rezoning in Sligo Town
156	22 December	Cllr Joe Queenan	n/a	Enniscrone Town Plan
157	22 December	Shane Rafferty, Chairperson	Ballymote Community Council	Ballymote Town Plan
158	22 December	Name not provided	Housing and Disability Steering Group, Sligo CoCo	Housing
159	22 December	Chris Kennedy	n/a	Rezoning in Curry
160	22 December	Martina Keenan Rivero, McCutcheon Halley Planning Consultants	Cathal O'Connor and David McMunn	Rezoning in Ballysadare
161	22 December	Michael Doherty	n/a	Wine Street Car Park Masterplan
162	22 December	Leonie Duignan	n/a	Proposed road in Ballymote
163	22 December	Michael Conmy, Bury Architects	Jonathan Ruane	Rezoning in Rosses Point
164	22 December	Michael Conmy, Bury Architects	Bernard Fox (Pentico Contracting)	Rezoning in Enniscrone

<b>Ref. no.</b>	<b>Date received</b>	<b>Name of person who signed the submission</b>	<b>on behalf of (where applicable)</b>	<b>Types of issues raised</b>
165	22 December	Florian Leavy	n/a	Pedestrian route in Strandhill
166	22 December	Breana Coyle, Senior Planner, Jennings O'Donovan	Strandhill Golf Club	Rezoning in Strandhill
167	22 December	Name not provided	Cliffony Community Forum	Cliffony Village Plan
168	22 December	MKO Planning Consultants	Tony McCaul and Patrick Carty	Rezoning in Strandhill
169	22 December	Vincent Hannon Architects	Omicrest Ltd.	Rezoning in Strandhill
170	22 December	Orlagh Cawley	OMD Design Ltd	Various issues
171	22 December	MKO Planning Consultants	Gary Mullane and Alan McCarrick	Rezoning in Sligo Town
172	22 December	Martina Keenan Rivero, McCutcheon Halley Planning Consultants	Margaret and Walter Burke	Rezoning in Sligo Town
173	22 December	John Monahan	n/a	Strandhill zoning
174	22 December	Sean Vesey	n/a	Rezoning in Ballymote
175	22 December	Seamus Tuffy	n/a	Indicative road corridor in Enniscrone
176	22 December	David McGowan	n/a	Indicative road corridor in Enniscrone
177	22 December	Wayne O'Keeffe	n/a	Proposed road in Ballymote
178	22 December	Kassie Irwin	n/a	Ballymote Town Plan
179	22 December	Virtus Planning Consultants	Altitude Distribution Ltd	Rezoning in Sligo Town
180	22 December	Cllr Donal Gilroy, SCC	n/a	Various issues
181	22 December	Eoin Casserly	n/a	Eastern Garavogue Bridge

Ref. no.	Date received	Name of person who signed the submission	on behalf of (where applicable)	Types of issues raised
182	22 December	No name provided	<b>Achonry Farmers' Market</b>	Farmers' markets
183	22 December	<b>Brian McCann, Lecturer in Road and Transport Engineering</b>	<b>Atlantic Technological University, Sligo</b>	LTP proposals
184	22 December	<b>Anne Marie O'Connor, Deputy Regulator</b>	<b>Office of the Planning Regulator</b>	Five (5) recommendations, seven (7) observations
185	22 December	<b>Ronan Gilroy</b>	n/a	Co-housing in Sligo Town
186	22 December	<b>Patricia Conway</b>	n/a	Rezoning in Rosses Point
187	22 December	Name not provided	<b>Sligo Coastal Mobility Action Group</b>	Active travel in Strandhill
188	22 December	<b>Declan Brennan</b>	n/a	Rezoning in Easky
189	21 December	<b>Maureen McDermott</b>	<b>Enniscrone Pier Improvement Steering Group</b>	The Pier in Enniscrone
190	20 December	<b>Lisa Kenny</b>	n/a	Proposed road in Ballymote
191	20 December	<b>Siobhán Coleman</b>	n/a	Proposed road in Ballymote
192	21 December	<b>Mairead Scanlon</b>	n/a	Proposed road in Ballymote
193	21 December	<b>David Loughheed</b>	n/a	Proposed road in Ballymote
194	21 December	<b>Shane Dineen, Environment &amp; Planning Manager</b>	<b>Faite Ireland</b>	Tourism policies
195	21 December	<b>Aleksandra Dyl</b>	n/a	Proposed road in Ballymote
196	21 December	<b>Breana Coyle, Senior Planner, Jennings O'Donovan</b>	<b>Strandhill Golf Club</b>	Rezoning in Strandhill
197	21 December	<b>Studio C21</b>	<b>Tony O'Beirne</b>	Rezoning in Drumcliffe
198	21 December	<b>Karol Jankowski</b>	n/a	Proposed road in Ballymote

<b>Ref. no.</b>	<b>Date received</b>	<b>Name of person who signed the submission</b>	<b>on behalf of (where applicable)</b>	<b>Types of issues raised</b>
199	21 December	<b>Maura McGettrick</b>	n/a	Proposed road in Ballymote
200	21 December	<b>Pippa Black, Secretary</b>	<b>Sligo Disabled Persons' Association</b>	Transport and circulation
201	21 December	<b>Pippa Black</b>	<b>Sligo PPN Housing Thematic Network</b>	Housing types, sizes and location
202	21 December	<b>Helen Nelson</b>	n/a	Proposed road in Ballymote
203	21 December	<b>Caroline Gray</b>	<b>Monasteraden Community Enhancement Group</b>	Rezoning in Monasteraden
204	22 December	<b>Alexander Sznajder</b>	n/a	Tourist attraction in Sligo Town
205	22 December	<b>Brian Roche, Consulting Engineer</b>	<b>John Howley</b>	Rezoning in Curry
206	22 December	<b>Marcus and Karen Jackson</b>	n/a	Rezoning in Gorteen
207	22 December	<b>Bobby Hogge</b>	n/a	Proposed road in Ballymote
208	22 December	<b>Roger Garland</b>	<b>Keep Ireland Open</b>	Various issues
209	22 December	<b>Siobhán Callaghan, Senior Environmental Health Officer</b>	<b>HSE / National Environmental Health Service</b>	Health-promoting policies
210	22 December	<b>Gerard Scanlon</b>	<b>Adrian Haran</b>	Ballygawley zoning
211	22 December	<b>Hailey and Matthew Scanlon</b>	n/a	Proposed road in Ballymote
212	22 December	<b>Peter Bowen Walsh</b>	<b>West=On=Track</b>	Railways and rail transport



## Section 4.

### Submission 184 – Office of the Planning Regulator

<https://consult.sligococo.ie/en/submission/slg-c29-184>

The Office has evaluated and assessed the draft Plan under the provisions of sections 31AM(1) and 31AM(2) of the *Planning and Development Act 2000*, as amended. The OPR's submission contains **five recommendations and seven observations**.

- **Recommendations** issued by the Office “relate to clear breaches of the relevant legislative provisions, of the national or regional policy framework and/or of the policy of Government, as set out in the Ministerial guidelines under section 28”, and that the Planning Authority is **required** to implement or address such recommendations.
- **Observations** take the form of a request for further information, justification on a particular matter, or clarification regarding particular provisions of the Draft Plan. The Planning Authority is **requested** (not “required”) by the Office to “action an observation”.
- In addition, the Planning Authority is **requested** by the Office to give full consideration to the OPR's **advice** that would contribute positively to the proper planning and sustainable development of the area.

The Overview below, which is an extract from the OPR's letter, represents a broad summary of the submission.

The Chief Executive's response relates to 21 issues arising from the OPR's recommendations, observations and advice. The CE recommendations are detailed after the response to each issue.

#### Overview

The Office considers that the draft Plan generally sets out a well-balanced approach for the future development of the county, with appropriate focus on the continued growth and development of Sligo Town as a Regional Growth Centre, and in a manner that promotes compact growth and regeneration.

The inclusion of a specific chapter which outlines how the draft Plan addresses the Regional Policy Objectives related to the Regional Growth Centre Strategic Plan in the Regional Spatial and Economic Strategy for the Northern and Western Region (RSES) also provides a strong framework to support the critical role of the town in the wider county and region.

The Office also strongly commends the planning authority's efforts to support regeneration which is evident from the approach in the draft Plan and the implementation of major regeneration projects including Cranmore Regeneration and public realm interventions such as O'Connell Street and Queen Maeve Square. The Office encourages the planning authority to further explore land activation measures with assistance from the Urban Regeneration and Development Fund along with other funding streams which will be critical for the enhancement Sligo Town's attractiveness and prioritisation of urban-led development.

The Office commends the planning authority for preparing a Local Transport Plan (LTP) which includes specific actions and measures to support the integration of land use and transport planning and active travel, including policy commitments to enhance the county's accessibility through sustainable transport measures, which in turn respond to the need to reduce emissions from transport in respect of climate action.

The Office has identified a relatively small number of areas which require further consideration in order to more fully align the development framework for the county with current national and regional policies.

In this regard, the Office considers that there may be scope to direct additional population growth to Sligo Town to better reflect the population targets in the RSES and the need to develop a centre of scale.

The planning authority will also be aware of the need to address matters within the scope of section 10(2)(n) of the Act in relation to climate change. In this regard, the Office welcomes the inclusion of a dedicated chapter on climate action in the draft Plan. The Office notes that objective O-REN-1 commits to preparing a renewable energy strategy consistent with the *Sligo County Council Draft Climate Action Plan 2024-2029*.

While this is welcomed, the Office considers that the strategy should be prepared within one year of the publication of the Methodology for Local Authority Renewable Energy Strategies and should include a review of the landscape character map in the draft Plan. Further, it is considered there is scope for the draft Plan to include additional policy support and direction for renewable energy generation in appropriate locations.

The Office has also identified a number of issues relating to flood risk management which will need to be addressed prior to the adoption of the Plan.

Other matters raised by way of observations generally relate to minor matters that can be clarified or addressed through the plan process.

It is within this context the submission below sets out five (5) recommendations and seven (7) observations under the following 8 themes:

<b>Key theme</b>	<b>Recommendation</b>	<b>Observation</b>
<a href="#">Core strategy and settlement strategy</a>	<a href="#">Recommendation 1</a> <a href="#">Recommendation 2</a>	<a href="#">Observation 1</a>
<a href="#">Housing strategy and relevant policies</a>	<a href="#">Recommendation 3</a>	<a href="#">Observation 2</a>
<a href="#">Economic development and employment</a>	-	<a href="#">Observation 3</a>
<a href="#">Sustainable transport and accessibility</a>	-	<a href="#">Observation 4</a> <a href="#">Observation 5</a>
<a href="#">Climate action and renewable energy</a>	<a href="#">Recommendation 4</a>	-
<a href="#">Flood risk management</a>	<a href="#">Recommendation 5</a>	-
<a href="#">Environment, heritage and amenities</a>	-	<a href="#">Observation 6</a>
<a href="#">Implementation and monitoring</a>	-	<a href="#">Observation 7</a>

## Issue 1 - Sligo Regional Growth Centre

The development of the Sligo Regional Growth Centre as a driver of growth in the region is a central objective the RSES and of the Sligo Regional Growth Centre Strategic Plan (SRGCSP).

In this regard, the Office welcomes the level of detail provided in Chapter 4 in response to the challenges and opportunities identified for the SRGCSP area. In particular, the draft Plan identifies strategic areas that have significant growth potential and where critical support infrastructure exists or is planned, including the Docklands, the Cranmore Regeneration Project, the Centre Block (Wine Street Car Park), the Courthouse Block and the Quay Quarter. The regeneration of these sites will be a catalyst for economic and residential regeneration for the north-west region.

The inclusion of a zoning map and objectives for Sligo Town is strongly welcomed and will provide a strong policy framework for the preparation of a future local area plan.

The Office is satisfied that the draft Plan provides a high level of consistency with the SRGCSP in the RSES.

### Response

The positive comments are noted. **No change to the Draft Plan is required.**

## Issue 2 - Housing and population targets (Core Strategy)

The Office considers that the total county population projections for the plan-period, as set out in Table 3.2 of the draft Plan, are broadly consistent with the population prescribed for the county in the RSES and the *Implementation Roadmap for the National Planning Framework (2018)*.

### A. Housing supply target (HST)

While the housing supply target (HST) contained in Table 5.2 of the draft Plan is in compliance with the *Housing Supply Target Methodology for Development Planning, Guidelines for Planning Authorities (2020)*, the Office considers that the HST figure for the plan-period should be reviewed as our assessment indicates that the figure may need to be adjusted upwards.

Since there is sufficient zoned residential lands to accommodate any minor adjustment (as evident from Table 3.2), the rezoning of additional land would not be required.

Furthermore, any additional HST increase should be directed to Sligo Town in the first instance having regard to RPO 3.7.37 and the transitional population target figure in Table 3 of the RSES.

### B. Sligo Town housing allocation

The core strategy allocates 2,512 housing units or approximately 65% of the HST allocation to Sligo Town which is considered appropriate having regard to its designation as a Regional Growth Centre and to RPOs 3.1 and 3.7.38. While the draft Plan zones sufficient land to accommodate 2,952 units, the Office considers the overall zoning approach for residential development in Sligo Town to be acceptable.

### C. Sligo Town population target

In relation to population growth targets in the core strategy, it has a 2030 population target of 23,800 for Sligo Town, which is an increase of 3,192 persons. Table 3 of the RSES has a transitional population target of 26,000 people by 2031 and a population uplift of 8,000 people by 2040.

Since the core strategy's population target to 2030 would not reach the transitional population target for 2031 in Table 3 of the RSES, the Office considers that, there is scope for the draft Plan to show more ambition in relation to population growth in Sligo Town, having regard to RPOs 3.7.37 and 3.7.38, and the further alignment with NPO 2b, NPO 2c and NPO 5.

The outcome of these changes would be to give greater effect to the draft Plan's stated core strategy guiding principles for compact growth and rejuvenation of the Sligo Regional Growth Centre, acting as an economic driver for the region, and also further improve alignment and consistency with regional policy objectives contained in the Sligo Regional Growth Centre Strategic Plan (Section 3.7 of the RSES).

## Recommendation 1 – Population and housing targets

Having regard to the:

- *Housing Supply Target Methodology for Development Planning, Guidelines for Planning Authorities* (2020);
- the population growth targets for Sligo Town under RPO 3.7.37 and RPO 3.7.38; and
- the transitional population target for Sligo Town in 2031 contained in Table 3 of the RSES,

the planning authority is required to review the housing supply target figures in Table 5.2 of the draft Plan in consultation with the Office and the Department of Housing, Local Government and Heritage.

The planning authority is advised that should the adjusted housing supply target figure increase, any additional surplus should be allocated to Sligo Town to provide for a greater level of population ambition to 2031 consistent with the Regional Spatial and Economic Strategy.

## Response

### 2.A Housing supply target (HST)

In 2021, after publishing the Housing Supply Target Methodology Guidelines, the DHLGH circulated an additional database which had formed the basis for Appendix 1 of the Guidelines. Due to insufficient clarity in the methodology, the calculations presented in Table 5.2 (Chapter 5) of the Draft Plan used a subset of the DHLGH database which was different from what the OPR used to verify such calculations.

Following consultation with the DHLGH, as recommended by the OPR, the calculations in Table 5.2 have been revised. The resulting total housing demand in County Sligo for the Plan period is only slightly higher, i.e. **4,029 instead of 3,892**.

The surplus of **137 units** shall be added to the housing allocation for Sligo Town (see 2.B below)

### 2.B Sligo Town housing allocation

The Office's opinion is noted. While the potential housing yield (Column 6 of Table 3.2) of relevant zoned lands in Sligo Town remains the same, the specific housing allocation (Column 2 of Table 3.2) shall be revised upwards, by distributing the additional units to Sligo Town. The new figure shall be **2,649 instead of 2,512**.

### 2.C Sligo Town population target

The 23,800 population target for Sligo Town, as presented in Table 3.2 (Chapter 3 Core Strategy Statement) has been assigned in the context of the entire Settlement Strategy. The population envisaged for Sligo Town is correlated not only with reasonable targets for lower-tier settlements and rural areas, but also with the overall 2030 County population projection as inferred from the NPF Implementation Roadmap. Even at this level, Chapter 5 of the Draft Plan clearly indicates that "this is a very ambitious target, which may not be attained based on past trends" (Section 5.2.2, p. 36 in Volume 1).

However, there is no objection to increasing the population target for Sligo Town from 23,800 to 25,360, which would correspond (pro rata) to the “minimum uplift to 2031” set out in the RSES.

The **additional 1,560 persons** shall be added to the overall County population projection for 2030. All population targets for lower-tier settlements and rural areas shall remain unchanged.

## Recommendations

- CE-05-01** In **Chapter 5 Settlement Strategy**, revise the calculations in **Table 5.2** (Adjusted total housing demand in Co. Sligo during the Development Plan period) based on the supplementary clarifications provided by the DHLGH and amend the relevant figures in the table – *see the recommended amendments to Table 5.2 on the next page.*
- CE-03-01** Replace the total HST allocation and the Sligo Town HST allocation in the **Core Strategy Table 3.2** (p. 22 in Volume 1 of the Draft Plan) with revised figures as calculated above, i.e. **4,029 units for the County (total adjusted demand) and 2,649 units for Sligo Town.**
- CE-03-02** In **Section 3.3 Core Strategy Table**, update the population target and housing allocation for Sligo Town in accordance with **CE-05-01** and **CE-03-01**, as well as all the related percentages. – *see the recommended amendments to the Core Strategy Table on the next page(s)*
- CE-03-03** In **Section 3.3.1 Notes on the Core Strategy Table**, update the population and housing figures and percentages in accordance with those in the revised Core Strategy Table. – *see the recommended changes to the text on the next page(s)*
- CE-03-04** All occurrences of the **23,800** population target for Sligo Town shall be replaced with the updated **25,360** population target before publication of the final, adopted Plan
- CE-03-05** All occurrences of the **3,892** housing allocation for the County shall be replaced with the updated **4,029** housing allocation before publication of the final, adopted Plan.

**CE-05-01** (in response to Submission 184/Issue 2.A)

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

Plan period: Q3 2024 to Q3 2030 (1 July 2024 to 30 June 2030)		Annual average households	Total households
<b>A</b>	<b>ESRI NPF scenario projected new household demand 2017 to Q2 2030</b> (end of Plan period)	827 896 p.a. (over the 6 years of the Plan)	<b>4,964 5,381</b> (from ESRI research)
<b>B</b>	<b>Actual new housing supply 2017 to Q4 2022 and estimated future delivery in 2023 and Q1-Q2 2024</b>		<b>1,188 1,345</b> (from CSO completions data and estimation of 2023-2024 delivery based 2023 on average of 2017 to 2022)
<b>C</b>	<b>Homeless households</b> (latest data from January 2023 Homeless Report), and <b>unmet demand</b> as at Census 2016		<b>59</b> (from DHLGH and Census) (was 43 originally)
<b>D</b>	<b>Plan Housing Demand = Total (A-B+C)</b> (Projected ESRI NPF demand - new completions) + Unmet demand	<b>639 682 p.a.</b>	<b>3,835 4,095</b>
<b>E</b>	Potential adjustment 1 to end 2026 portion of plan period to facilitate convergence to NPF strategy (where justified)	Mid-point between ESRI NPF and baseline scenarios to 2026 in lieu of A above	
<b>E1</b>	ESRI Baseline scenario projected new household demand 2017 to Q4 2026		<b>4,056</b> (from ESRI research)
<b>E2</b>	ESRI NPF scenario projected new household demand 2027 to Q2 2030 (Plan end)		<b>1,230 1,315</b> (from ESRI research)
<b>E3</b>	Mid-point between A-E2 (ESRI NPF and Baseline scenarios to Q4 2026)		<b>3,791 4,000</b>
<b>E4</b>	<b>Adjusted Total Plan Demand</b> calculation based on E2 + E3 in lieu of A above	<b>648 671</b>	<b>3,892 4,029</b> (E2 + E3 - B + C = total)
<b>F</b>	<i>NOT APPLICABLE IN THIS EXAMPLE</i> <i>Potential adjustment 2 to end 2026 portion of plan period to facilitate convergence to NPF strategy, applicable where B exceeds or is close to D (where justified)</i>	<i>Mid-point between ESRI NPF and baseline scenarios to 2026 in lieu of A above, plus up to 25%</i>	

**CE-03-02** (in response to Submission 184/Issues 2.B and 2.C)

**Core Strategy Table (Table 3.2 in Section 3.3)**

0	1	2	3	4	5	6	7
Settlement	Population 2022 and percentage of County population	Population target 2030 and percentage of County target	Housing allocation 2030 and percentage of County HST allocation	RES and MIX zoning 2017, undeveloped in 2023 (hectares)	Proposed RES and MIX zoning 2024 (hectares)	Potential housing yield of RES and MIX proposed zoned lands 2024 (dwellings)	Current (2023) excess of zoned land (hectares)
Sligo Town Regional Growth Centre	20,608 (29.3%)	23,800 (31.77%) 25,360 (33.12%)	2,512 units (64.54%) 2,649 (65.74%)	43 ha	86.85 ha	2,952	No excess
Ballymote Support Town	1,711 (2.44%)	1,850 (2.46%) (2.41%)	185 units (4.75%) (4.59%)	22 ha	9.94 ha	215	12.09 ha
Enniscrone Support Town	1,291 (1.84%)	1,400 (1.86%) (1.82%)	130 units (3.34%) (3.22%)	18.5 ha	6.69 ha	151	11.86 ha
Tobercurry Support Town	2,307 (3.29%)	2,450 (3.27%) (3.20%)	130 units (3.34%) (3.22%)	No zoning in 2017	6.88 ha	153	Not applicable
5 Satellite Villages	7,250 (10.32%)	7,750 (10.34%) (10.12%)	370 units (9.50%) (9.18)	34.5 ha	22.73 ha	433	11.81 ha
3 villages with special tourism functions	1,290 (1.83%)	1,400 (1.86%) (1.82)	70 units (1.80%) (1.73%)	20.8 ha	6.29 ha	82	14.54 ha
All other villages and rural areas	35,913 (51.16%)	36,500 (48.73%) (47.67%)	495 units (12.71%) (12.28%)	59.2 ha	No RES or MIX zoning	580	59.2 ha
<b>Total</b>	<b>70,198</b>	<b>75,000</b> (estimated from NPF) <b>76,560</b> (estimated from NPF plus additional Sligo Town population derived from RSES)	<b>3,892</b> <b>4,029</b> <b>units</b> (HST allocation)	<b>198 ha</b>	<b>132.5 ha</b>	<b>4,566</b> <b>units</b> (117% 113% of HST allocation)	<b>65.5 ha</b>

**CE-03-03** (ensuring consistency with **CE-03-02** above, which responds to Issues 2.B and 2.C)

### 3.3.1 Notes on the Core Strategy Table

- The figures presented in Columns 2, 3, 5, 6 and 7 of the Core Strategy Table correspond to the **Draft** County Development Plan 2024-2030. These figures may change if amendments to zoning, housing or population allocations are made as a result of public consultation on the Draft Plan. The Core Strategy Table will be updated upon adoption of the new CDP 2024-2030.
- The total County population estimate of **75,000 76,560** by 2030 is based on the NPF/ESRI population projections contained in the **NPF Implementation Roadmap plus the additional Sligo Town population required to meet the RSES target. Based on previous demographic trends, this figure is considered reasonable and attainable.**
- The total County housing allocation of **4,029 3,892** is calculated using the *Housing Supply Target Methodology* (refer to Table 5.2 in Chapter 5). There is no correlation between the population allocations and the housing allocations, because the HST figure is an “adjusted total housing demand”, which takes into account the undersupply of housing since 2017, and factors in a degree of “convergence to NPF strategy”.
- The allocations in Column 3 represent circa **85% 88%** of the potential housing yield of zoned lands in each settlement. Based on past trends, it would be unrealistic to expect that the zoned land is fully developed during the Plan period. The assumed utilisation rate of **85% 88%** is optimistic, given that less than 50% of residential development in County Sligo has taken place on zoned lands since 2011.
- The allocation of 580 dwellings (Column 6) to “All other villages and rural areas” consists of 480 one-off houses (estimated by the Housing Strategy) and an overall estimate of 100 dwellings that may be built within villages without housing allocations, on lands zoned RV (“Rural Village”).

### **Issue 3 - Settlement Hierarchy and distribution of growth**

The Office considers that the distribution of population growth across the settlement hierarchy generally reflects the policies and objectives of the NPF and RSES on compact growth and reversal of rural decline in villages, as set out in NPOs 3, 6, 7, 9, 16, 18a and RPOs 3.1, 3.2, 3.4 and 3.13.

#### ***First tier – Sligo Town / Regional Growth Centre***

The proposed settlement hierarchy, including the identification of Sligo Town as the Regional Growth Centre, is consistent with the settlement typology approach set out in section 4.5.1 of the *Development Plans, Guidelines for Planning Authorities* (2022) (the Development Plans Guidelines).

#### ***Second tier – three Support Towns***

The Office:

- accepts the designation of Ballymote, Enniscrone and Tobercurry as Support Towns and second tier settlements in the settlement hierarchy,
- agrees with the approach outlined in section 3.2.1 of the core strategy to provide ‘...for consolidation, regeneration and a quantum of growth proportional to their current population and infrastructural capacity.’
- welcomes policy objective SP-S-2 which is consistent with NPO 18a and RPO 3.4 and will ensure that these settlements will serve this part of the north-west as an accessible centre of employment
- notes that collectively, the core strategy allocates 11.4% of the overall HST allocation to the three second tier settlements, which is considered appropriate in respect of their infrastructural capacity.

#### ***Third tier – five Satellite Villages***

The third tier is occupied by the Satellite Villages of Ballysadare, Collooney, Coolaney, Grange and Strandhill. The Office:

- agrees with the approach outlined in the core strategy, which is to ‘carefully manage development, prioritising the provision of adequate service infrastructure, recreational and community facilities.’
- acknowledges that the core strategy allocation for this tier is 370 units, which is considered appropriate in light of the recent significant population increases and limited services.

#### ***Fourth tier – three Villages with Special Coastal Tourism Functions***

The fourth tier contains the villages with special coastal tourism functions (a role shared with Enniscrone and Strandhill), and the core strategy supports the provision of adequate infrastructure for sustainable tourism development in these villages.

The Office considers appropriate the core strategy allocation of 70 housing units to this tier.

#### ***Fifth and sixth tier – Villages Sustaining Rural Communities, unserviced villages, rural settlement***

The fifth tier contains 19 villages sustaining rural communities and are supported through the core strategy to cater for limited local needs in terms of residential development.

The sixth tier contains the unserviced villages and dispersed settlement in rural areas.

The Office considers appropriate the combined core strategy allocation for Tiers 5 and 6 of 495 housing units or 12.7% of the total.

### **Response**

The positive comments are noted.

**No change to the Draft Plan is required.**

## Issue 4 - Residential development – compact growth and sequential approach

A. The planning authority's overall approach to zoning and designation of lands for settlement consolidation, infill/ brownfield, and compact growth is considered acceptable and consistent with section 1.3.5 of the Development Plans Guidelines.

The Office of the Planning Regulator:

- notes the potential to achieve more homes and jobs in the urban core of Sligo Town and its support towns (Tier 2 settlements), through higher-density mixed-use development, thus facilitating people to live within reasonable distance of workplaces.
- welcomes the use of appropriate average residential densities for each town and village having regard to the NPF, the *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas: Cities, Towns & Villages* (2009) and subsequent *Circular Letter NRUP 02/2021*.
- commends the planning authority's approach (in section 3.3.2 of the core strategy) to excess of zoned lands for residential development, consistent with the Development Plans Guidelines.
- notes the retention of the most suitable (highest scoring) sites identified in the infrastructural assessment for future residential and mixed-use development and designated such lands as settlement consolidation sites.
- welcomes the designation of less centrally located lands with a live planning permission for residential development as Additional Provision Sites.
- welcomes section 11.2.1 (Chapter 11 Sligo Town Plan in Volume 2 Urban Development), which lists the sites selected to contribute to compact growth in Sligo Town and environs, together with their potential housing and population yields. This includes Settlement Consolidation Sites (SCS) and Additional Provision Sites (AP).
- welcomes that all SCS, infill and AP sites are located largely within the 2016 Census boundary for Sligo Town, and that over 50% of the potential housing yield can be delivered within the settlement's built-up footprint, which exceeds the 40% requirement of RPO 3.7.39.
- notes that there are two sites with a combined area of 81.5 hectares which have the potential for significant residential development to be built over a timescale greater than a single six-year development plan-period, and having regard to their strategic location and development potential. These lands are appropriately designated as Long-Term Strategic and Sustainable Development Sites consistent with the recommendations of section 4.4.4 of the Development Plans Guidelines.
- welcomes identification of sites which would contribute to compact growth in the Support Towns of Ballymote, Enniscrone and Tobercurry. The Office notes that all SCS sites and the AP sites are located largely within the 2016 Census boundaries for the three settlements and there is potential to accommodate in excess of the 30% requirement for future housing within the built-up footprint consistent with RPO 3.2(c).

B. The Office notes that the draft zoning map for Grange zones a significant site as Strategic Land Reserve on the western approach to the village. The site is zoned Green Belt in the Sligo County Development Plan 2017-2023 and the infrastructure assessment indicates that the lands are not fully serviced. The lands would not promote compact growth or consolidation and are not required to meet the settlement's housing allocation. The Office considers that the Green Belt zoning should be retained for the forthcoming plan period.

## Recommendation 2 - Zoning of land for Strategic Land Reserve in Grange

Having regard to the provision of new homes at locations that can support compact and sustainable development and the co-ordination of land use zoning, infrastructure and services, and in particular to:

- section 10(2)(n) of the Planning and Development Act 2000, as amended, concerning the promotion of sustainable settlement and transport strategies;
- NPO 3c and RPO 3.2, compact growth;
- NPO 72a-c and associated NPF Appendix 3, tiered approach to zoning;
- the infrastructural assessment in Appendix A of the Draft Sligo County Development Plan 2023-2029; and
- the *Development Plans, Guidelines for Planning Authorities (2022)* in respect of the policy and objective for the sequential approach to zoning,

the planning authority is required to omit the Strategic Land Reserve zoning from the site on the L3203 on the western approach to the Grange village and retain the Green Belt zoning.

### Response

#### 4.A Compact growth and sequential approach to residential development

The Office's opinions are noted. **No change to the Draft Plan is required.**

#### 4.B Zoning of site in Grange

The site identified as No. 6 in the Infrastructure Assessment for Grange (Appendix A, Section A.9) is indeed not fully serviced. The purpose of designating the site adjoining the local road L-3203 (shown on the Draft Grange Zoning Map) as Strategic Land Reserve was to emphasise that this is the most likely direction where the village could expand in the future.

However, there is no objection to redesignate this site as Green Belt, having regard to the GB zoning objective which is designed to "contain and consolidate settlements, while safeguarding lands for their future expansion and for the provision of strategic infrastructure".

### Recommendation

**CE-18Z-02** In **Chapter 18 Grange Village Plan**, change the zoning of 2.49 ha of lands from SLR (Strategic Land Reserve) to GB (Green Belt) as shown on the CE-Recommended Zoning Amendments Map for Grange.



## Issue 5 - Residential land use zoning – infrastructural assessment

The Office acknowledges that the planning authority carried out an infrastructural assessment of existing undeveloped zoned lands in towns and villages which have a land use zoning plan.

The Office notes that the outcome of the infrastructural assessment and settlement capacity audits confirmed that there is an excess of fully serviced, undeveloped, zoned land in Sligo Town and county. In the interests of achieving compact growth, the planning authority has retained the most suitable sites for future residential and mixed-use development and designated same as SCS and in Sligo Town only which is welcomed.

The Office's assessment of the zoning maps for Sligo Town, Ballymote and Enniscrone notes some discrepancies regarding the maps in the infrastructural assessment as follows:

- A. lands zoned BIE at Ballytivnan and Finisklin, and zoned RW at Carrowroe in Sligo Town have not been categorised in section A.2 of the infrastructural assessment. These lands are all inside the development limit for Sligo Town and are only partly developed with remaining pockets of greenfield sites.
- B. there appears to be a discrepancy between the zoning map for Ballymote and the infrastructure assessment. Site IA7 has a SLR-2 compact growth designation and is shown inside the development limit in the infrastructure assessment, however the site is zoned Green Belt and is located outside the development limit on the zoning map.
- C. the infrastructure assessment categorises the land south of the proposed new road corridor in Enniscrone as Tier 1, however the other larger site zoned Tourism and undeveloped is not categorised in the infrastructure assessment.

### Observation 1 – infrastructure assessment maps

Having regard to the co-ordination of land use zoning, infrastructure and services, and in particular to:

- NPO 72a, NPO 72b and NPO 72c, tiered approach to zoning; and
- the *Development Plans, Guidelines for Planning Authorities (2022)*, policy and objective for settlement capacity audits and associated infrastructural capacity assessment,

the planning authority is requested to:

- (i) review section A.2 of the infrastructural assessment to ensure that lands zoned for employment / retail uses in Sligo Town are categorised in terms of their serviceability; and
- (ii) review the zoning maps and maps included in the infrastructural assessment to ensure they are consistent with each other in respect of sites identified for development.

## Response

### 5.A Infrastructural assessment of lands in Sligo Town

The observation is noted. Section A.2 (Sligo Town) of Appendix A should be modified to include the lands zoned for BIE at Ballytivnan and Finisklin, and the lands zoned RW at Carrowroe, which are within the development limit but only partially developed. These lands are fully serviced and should be categorised as Tier 1.

## 5.B Infrastructural assessment and zoning of site in Ballymote

This discrepancy is addressed in response to Submission 75 which proposes the making of amendments to the zoning of these lands in the Ballymote Town Plan.

**No further change to the Draft Plan is required on foot of the above.**

## 5.C Infrastructural assessment of sites zoned for Tourism in Enniscrone

The site marked 11 on the Infrastructure Assessment map for Enniscrone (Appendix A, Section A.4) has not yet been developed, while the other large site zoned for tourism contains the fully-developed Atlantic Caravan Park.

**No change to the Draft Plan is required on foot of the above.**

## Recommendation

**CE-A.2-01** The lands zoned BIE at Ballytivnan and Finisklin, and the lands zoned RW at Carrowroe on the Draft Sligo Town Zoning Map shall be assessed in terms of infrastructure and categorised accordingly in **Appendix A, Section A.2 Sligo Town**.

## Issue 6 – Traveller accommodation

The Office welcomes the overall approach to Traveller accommodation in the draft Plan which includes two policies and one objective specifically relating to accommodation for Travellers and identifies specific locations on Map 2 – Sligo Town Draft Objectives Map. The Office considers that the requirements of section 10(2)(i) of the Act have therefore been adequately met.

## Response

The positive comments are noted.

**No change to the Draft Plan is required.**

## Issue 7 - Community facilities and zoning categories

The Office welcomes the community and social Infrastructure section of the draft Plan which is supported through the zoning and strategic objectives included in the town and village plans. Furthermore, the Office understands that a flexible and supportive approach will be adopted towards proposals for community facilities on suitable sites within other zoning categories (e.g. Residential / Mixed Uses / Industry / Enterprise).

That being said, the Office notes that the Community Facilities zoning permits a wide range of uses including data centres, hotels, offices, light industry and residential uses. The Office notes that the objective of the Community Facilities zoning is to *'Protect existing facilities or retain existing uses and provide for the establishment of new/additional community and institutional uses, such as schools, community centres, health centres etc.'*

In this regard, the Office considers that the range of uses normally permitted or open for consideration on the Community Facilities zoning should be curtailed especially regarding residential / commercial / employment uses to better reflect the intent of the zoning objective.

### Recommendation 3 – Community Facilities: Land Use Zoning Approach

Having regard to the:

- the objective of the Community Facilities zoning;
- the range of uses normally permitted and open for consideration within the Community Facilities zoning as provided for in the Land Use Zoning Matrix in Chapter 10;
- National Strategic Outcome 10 - Access to Quality Childcare, Education and Health Services; and
- section 6.2.1 of the *Development Plans, Guidelines for Planning Authorities* (2002) for zoning in the development plan,

the planning authority is required to review the range of uses normally permitted and open for consideration within the Community Facilities zoning and amend the land use zoning matrix to not normally permit uses which are incompatible with the primary objective of the zone such as residential and commercial / employment development.

Alternatively, the planning authority could provide an appropriate policy framework for the consideration of development proposals through the development management system.

### Response

The OPR's recommendation is noted and agreed.

### Recommendation

**CE-10-08** In the **Zoning Matrix** (Chapter 10 in Volume 2 Urban development), under the CF zoning category, replace the "open to consideration" symbol with the "**not normally permitted**" symbol for the following use types:

*B&B, car park, conference centre, data centre, enterprise centre, enterprise live-work units, hair salon, hotel, light industry, offices over 100 sq.m, park-and-ride facility, public house, apartments, houses, Traveller accommodation, retail shop (comparison), veterinary surgery, waste recycling depot.*

## Issue 8 – Potential need for additional schools in Sligo Town

In light of the population targets identified for Sligo town, the Office considers it prudent to consult with the Department of Education regarding the potential need for additional schools to support the Plan's ambition for substantial residential growth across Sligo Town.

### Observation 2 – School provision in Sligo Town

Having regard to:

- section 10(2)(j) of the *Planning and Development Act 2000*, as amended;
- National Strategic Outcome 10 - Access to Quality Childcare, Education and Health Services;
- sections 2.5.1 and 6.2.6 of the *Development Plans, Guidelines for Planning Authorities (2022)*; and
- the housing allocation for Sligo Town in the core strategy and its population and housing targets for the settlement in the RSES;

the planning authority is requested to review the need for school provision in Sligo Town in consultation with the Department of Education.

## Response

The observation is noted and agreed. The submission received from the Department of Education (Submission 76) indicates that there is no anticipated requirement for new schools in conjunction with the projected population within the County's settlements outside Sligo Town. Any additional requirement for school places as primary and post-primary levels can be met by utilizing existing unused capacity within schools or by extending capacity.

Only in the case of Sligo Town, the Department of Education indicates that "it may be prudent to reserve a suitably zoned site for a potential future new primary school" and that the Plan should include "explicit support" in for the provision of additional school accommodation in Sligo Town.

Responding to the Department of Education, the Chief Executive has made two recommendations, **CE-27-01 and CE-27-03**, for amendments relating to the provision of a new primary school in Sligo Town – refer to Submission 76, Issue 1.

**No further changes to the Draft Plan are required on foot of this observation.**

## Issue 9 – Green Belt zoning

The Office welcomes the inclusion of a Green Belt zoning outside the identified development limit for settlements. Such an approach provides a clear focus for the consolidation of growth and a distinction from the open countryside while also reducing pressure for ribbon development on the periphery of settlements.

## Response

The positive comments are noted. **No changes to the Draft Plan are required in respect of the above.**

## Issue 10 - Rural housing policy

The Office notes that section 5.5.1 of the draft Plan (Settlement Strategy) outlines the types of rural areas and corresponding policy provisions in respect of each. In this regard, the core strategy map makes a distinction between rural areas located within the hinterland of Sligo Town (rural areas under urban influence) and elsewhere (remote rural areas).

While the Office accepts the southern extent of the rural areas under urban influence as presented on the core strategy map, the Office advises the planning authority to monitor rural housing activity in the area extending along the recently upgraded N4 national road scheme to Castlebaldwin.

### Response

The advice is noted. As part of monitoring the implementation of CDP objectives post-adoption, an indicator will be included in respect of rural housing development in areas adjoining the upgraded national road N-4.

**No changes to the Draft Plan are required in respect of the above.**

## Issue 11 - Social and affordable housing

It is noted that strategic housing policy SP-HOU-2 includes a 20% requirement for social housing with no specific percentage requirement for affordable housing. The wording differs from the policy recommended in section 8.2 of the Housing Strategy which states:

*Reserve 20% of eligible sites which are subject to new residential development (or a mix of uses including residential) for the development of social / affordable housing units, in accordance with the Housing Strategy and the requirements of Part V of the Planning and Development Act 2000 (as amended).*

The planning authority is advised to review the above to ensure there is no inconsistency.

### Response

The advice is noted and agreed. The omission of "affordable" is due to a typographic error. The strategic housing policy SP-HOU-2 should indeed refer to social and affordable housing, not just to social housing.

### Recommendation

**CE-06-01** In **Chapter 6 Housing delivery strategy** (Volume 1 Core Strategy), amend the wording of the strategic housing policy **SP-HOU-2** as follows:

**SP-HOU-2** Reserve 20% of eligible sites which are subject to new residential development (or a mix of uses including residential) for the development of social **and affordable** housing units, in accordance with the Housing Strategy and the requirements of Part V of the Planning and Development Act 2000 (as amended).

## Issue 12 – Land zoned for employment

The draft Plan correctly acknowledges that in order for Sligo Town to meet its population growth targets, further job creation and economic development will be required to support its role as a regional economic driver in the north-west. The OPR notes that the zoning map for Sligo Town provides strategic employment land at Oakfield and Ballytivnan.

The Office welcomes the policies outlined in Chapter 28 which relate to business, industry and enterprise, particularly policy P- BIE-1 to support the consolidation of existing business / enterprise parks through their extension and/or the provision of new enterprise centres in Ballymote, Enniscrone and Tobercurry in addition to Strandhill.

The Office further welcomes policy P-BIE-3 which seeks to support the repurposing of vacant buildings in town centres for office-based enterprises.

### Response

The positive comments are noted.

**No change to the Draft Plan is required in respect of the above.**

## Issue 13 – Retail zoning at Carrowroe

The Office welcomes the comprehensive retail strategy in Chapter 8 of the draft Plan (Volume 1), the retail development standards as well as the general principles in relation to assessing retail proposals and the sequential approach to retail development as set out in sections 33.5.2 and 33.5.3 (Volume 3)

On a minor point, there appears to be a discrepancy in the Draft Sligo town Zoning Map regarding the appropriate zoning objective for Sligo Retail Park. The planning authority should review and confirm what the proposed land use zoning objective is for these lands and accurately display this on the zoning map.

### Observation 3 – Retail

The planning authority is requested to revise the Sligo Town Draft Land Use Zoning Map – Map 1 to ensure that the zoning objective for the Sligo Retail Park is accurately displayed on Map 1.

### Response

The observation is noted and agreed. Due to a technical error, the colour corresponding to the zoning category “Retail Park” has not been displayed correctly on the Draft Sligo Town Zoning Map.

### Recommendation

**CE-11Z-01** In **Chapter 11 Sligo Town**, on the **Zoning Map**, rectify the technical error that has led to the incorrect display (wrong colour) of the zoning objective for the area corresponding to Carrowroe Retail Park on the Draft Sligo Town Zoning Map.

## Issue 14 - Sustainable transport and accessibility

The Office is satisfied that the draft Plan contains sufficient policy support for integrated land use and transport planning, active travel and measures to support reducing emissions related to transport.

- A. The Office supports the policies and objectives to protect the strategic transport function of the national road network and to implement the road projects identified as strategically important in the RSES, including the Eastern Garavogue Bridge and Approach Roads Scheme. The planning authority should ensure that these strategic routes are clearly identified on all zoning maps in the draft Plan for transparency.
- B. Given the largely rural nature of the county and its extensive national road network, the Office considers that there is merit in providing a cross reference to policy P-NR- 1, which seeks to protect the traffic carrying capacity of national roads, in section 26.4 (Housing in Rural Areas) and Chapter 28 (Economic Development). This would provide clarification and early assistance to applicants in the preparation of planning applications where there may be implications for the strategic national road network in the area.
- C. The Office notes the Land Use Zoning map for Collooney shows a road corridor for the N17 road scheme, however, Chapter 13 – Collooney Village Plan does not include an associated strategic policy or objective regarding same. The Office advises the planning authority to include an appropriate policy / objective in Chapter 13 to reference the N17 Knock to Collooney Scheme and to safeguard the scheme pending its delivery.

### Observation 4 – National Roads

Having regard to:

- National Strategic Outcome 2 – Enhanced Regional Accessibility;
- Chapter 2 – Development Planning and Roads of the *Spatial Planning and National Roads Guidelines for Planning Authorities* (2012); and
- Policy P-NR-1 of the Draft Sligo County Development Plan 2024 – 2030, which seeks to protect the traffic carrying capacity of national roads;

the planning authority is requested to:

- (i) provide a cross reference to policy P-NR-1 in section 26.4 (Housing in Rural Areas) and Chapter 28 (Economic Development) of the draft Plan; and
- (ii) include an appropriate policy / objective in Chapter 13 to reference the N17 Knock to Collooney Scheme and to safeguard the scheme pending its delivery.

## Response

### 14.A Strategic routes identified on Zoning Maps

The observation is noted. Strategic national road corridors located in the vicinity of settlements corridors are generally shown on Zoning Maps, where the map scale permits. The scale of zoning maps should not be increased to show road corridors to the detriment of legibility of zoning objectives.

## 14.B Cross-referencing of national roads policy P-NR-1

The request to insert cross-references to the national road policy P-NR-1 (included in Chapter 29 Transport infrastructure) in other chapters of the Draft Plan, such as Chapter 26 (Residential development) and Chapter 28 (Economic development) is noted and agreed. A similar request has been made by Transport Infrastructure Ireland (TII) in Submission 47/Issue 3.

## 14.C N-17 road corridor on the Draft Collooney Zoning Map

The observation is noted. **Chapter 16 Collooney Village Plan** should include an objective corresponding to the *N-17 Knock to Collooney Preferred Transport Corridor*, which is shown on the Draft Collooney Zoning Map.

## Recommendations

**CE-26-09** In **Section 26.4 Housing in rural areas** (p. 53 in Volume 3 of the Draft Plan), modify the fourth paragraph under the main heading as follows:

Applications for individual houses outside towns and villages will be assessed based on the strategic rural settlement policies set out in Chapter 5 of this Plan, Section 5.5 Strategy for Rural Settlement, and – where applicable – with respect to their compliance with the national roads policy P-NR-1 (Chapter 29 Transport infrastructure), which seeks to protect the traffic carrying capacity of national roads.

**CE-16-04** In **Chapter 16 Collooney Village Plan**, insert an additional objective under **Section 16.3.3. Transport, circulation and parking** as follows:

H. Protect and safeguard the identified *Preferred Transport Corridor* of the N-17 Knock to Collooney National Road Scheme by preventing any type of development with the potential to compromise its future completion.

## Issue 15 – translating LTP measures into the Plan

The Office supports the actions and measures set out in the LTP which reflect the planning authority's preferred transport infrastructure improvements and proposals over the plan period, and Strategic Objective SO-TRA-5 which integrates these principles into the draft Plan.

- A. It is considered however, that some positive aspects of the LTP, particularly the modal share aspirations in Figure 4-4 and performance indicators and target aspirations ("Shift 10% of private car trips to alternative modes by 2027 increasing to 20% by 2030" - page 101) should be translated into policies / objectives in the draft Plan.
- B. Further, the planning authority should consider translating further specific measures / proposals from the LTP into the draft Plan to give them statutory weight and clarity on the settlement zoning maps.

## Observation 5 – Integration of Local Transport Strategy

Having regard to:

- section 10(2)(n) of the *Planning and Development Act 2000*, as amended, concerning sustainable settlement and transport strategies;
- RPO 6.27 and 6.28; and
- National Strategic Outcome 5 on sustainable mobility, and NPO 27, NPO 54 and NPO 64,

the planning authority is requested to:

- (i) include policies / objectives in the draft Plan to translate the modal share aspirations in Figure 4-4 and performance indicators and target aspirations (page 101) from the Local Transport Plan (LTP);
- (ii) review the LTP and consider translating further specific measures / proposals from the LTP into the draft Plan to give them statutory weight and clarity on the settlement zoning maps; and
- (iii) provide an effective monitoring regime for the implementation of the planning authority's sustainable transport strategy and the modal share targets in particular.

## Response

### 15.A Translating LTP modal share aspirations into Plan policies

Chapter 9 Transport Strategy (in Volume 1 Core Strategy) includes a section (9.3.2) containing the guiding principles and objectives of the LTP, while Settlement Plans in Volume 2 and Chapter 29 (Transport Infrastructure, Volume 3) already include details on specific proposals supporting walking, cycling and modal shift.

It is agreed, however, that the modal share aspirations shown in Figure 4-4 of the LTP and repeated in the targets outlined in LTP Section 7.2 (page 101-102) should be reflected in the strategic transport objectives in Chapter 9.

### 15.B Translating LTP specific proposals and showing them on zoning maps

The LTP-proposed cycle routes serving settlements within the LTP Study Area have been translated into the Draft Plan as specific objectives included in the **Transport, circulation and parking** sections of the respective settlement plans. Refer to Chapters 15 (Ballysadare Village Plan), 16 (Collooney Village Plan), 19 (Strandhill Village Plan) and 22 (Rosses Point Village Plan).

These routes should be shown on the additional **Objectives Maps**, recommended by the CE to be prepared for each settlement, in response to **Issue 18** of the OPR's submission – refer to **CE-FZ-01** (further in this section).

### 15.C Monitoring the implementation of sustainable transport strategy and modal share targets

Section 7.2 of the LTP sets out the targets and the performance indicators that will be used to assess the progress in implementing the LTP and the CDP's relevant objectives. The same table is proposed to be included in Section 9.3.2 Sligo Local Transport Plan, as indicated in response to 15.A above.

## Recommendations

- CE-09-04** In Chapter 9 Transport Strategy, **Section 9.3.2 Sligo Local Transport Plan**, include a new **Table 9.1** reproducing the table shown in Section 7.2 of the LTP (Performance Indicators and Target Aspirations) – *see recommended new table on next page*
- CE-09-05** In **Chapter 9 Transport Strategy**, include the following additional strategic objective:  
**SO-TRA-4** Pursue the implementation of the sustainable transport targets set out in **Table 9.1**.
- CE-15-03** In **Chapter 15 Ballysadare Village Plan**, show the **LTP-proposed cycle routes** on the additional **Ballysadare Objectives Map** recommended by the Chief Executive.
- CE-16-05** In **Chapter 16 Collooney Village Plan**, show the **LTP-proposed cycle routes** on the additional **Collooney Objectives Map** recommended by the Chief Executive.
- CE-19-02** In **Chapter 19 Strandhill Village Plan**, show the **LTP-proposed cycle routes** on the additional **Strandhill Objectives Map** recommended by the Chief Executive.
- CE-22-01** In **Chapter 22 Rosses Point Village Plan**, show the **LTP-proposed cycle routes** on the additional **Rosses Point Objectives Map** recommended by the Chief Executive.

**CE-09-04** (in response to Submission 184, Issue 15.C)

**Table 9.1 Performance indicators and target aspirations for assessing progress of the LTP**

Theme	Performance indicator	Target aspiration
Traffic congestion	Traffic counts during peak hours on key routes within the town centre	Reduce traffic volumes by 25% by 2030.
Public transport usage	Public transport ridership / passenger numbers	Increase public transport ridership by 20% by 2030
Active travel rates	Percentage of trips made by walking and cycling within the town centre	Increase the share of walking and cycling trips within the town to 25% of all trips by 2030
Modal shift	Percentage change in the share of private car trips compared to alternative modes (public transport, walking, cycling)	Shift 10% of private car trips to alternative modes by 2027, increasing to 20% by 2030.
Road safety	Number of road traffic accidents and fatalities within the study area	Reduce road traffic accidents within the study area by 15% and fatalities by 20% by 2027.
Carbon emissions	Total carbon emissions from transportation modes	Reduce fossil fuelled car kilometres by 10% by 2030.
Accessibility and equity	Accessibility of public transport services within the town centre and across rural areas	Ensure that 90% of residents have access to a public transport stop within a 10-minute walk within the town centre and service frequency is increased to rural areas
Infrastructure development	Completion of key infrastructure projects.	Review infrastructure provision to ensure alignment with design standards including DMURS and the National Cycling Manual. Completion of at least 3 key infrastructure projects by 2030
Parking demand and usage	Occupancy rate of parking facilities within the town centre	Reduce parking demand in line with reduced traffic congestion. Maintain 20-minute parking enforcement at key locations within the town centre

## Issue 16 - Climate action

The Office supports the Climate Action Framework set out in Chapter 2 of the draft Plan, acknowledges the commitment to prepare a Local Authority Climate Action Plan and the requirement for the draft Plan to align with the Local Authority Climate Action Plan. The Office welcomes Policy SP-CA-2 in this regard.

The Office also welcomes Table 2.1 Envisaged Climate Action effects of the Development Plan, which outlines the climate adaptation and mitigation effects of the draft Plan provisions.

The embedding of climate action and the integration of climate mitigation and adaptation measures through development management polices (Policy SP-CA-3) is also supported and welcomed by the Office.

## Response

The positive comments are noted. **No change to the Draft Plan is required.**

## Issue 17 - Renewable energy

The Office welcomes the preparation of the Draft Local Authority Climate Action Plan 2024-2029 and the intent to prepare a renewable energy strategy.

- A. While the Office welcomes the inclusion of a specific chapter on climate action and policies supporting renewable energy such as P-EN-2, the Office considers that additional policy and direction to promote a broad spectrum of renewable development is required, including in the core strategy and greater clarity in the development management standards (Chapter 33).
- B. The Office notes the identification of key issues and implications including the growing need to develop large renewable energy projects in Chapter 1 of the draft Plan. A Renewable Energy Strategy has not, however, been prepared as part of the draft Plan.

The planning authority will be aware of the forthcoming Methodology for Local Authority Renewable Energy Strategies which is due to be published in 2024. In this regard, the Office acknowledges the commitment to developing a renewable energy strategy for County Sligo during the lifetime of the draft Plan (Objective O-REN-1). However, having regard to the urgent need to meet national targets for renewable energy under the Climate Action Plan, the Office considers that a firmer commitment to prepare the Strategy is required.

- C. Furthermore, the Office notes that the landscape character map, which will inform the renewable energy strategy dates from 1996, and will also need to be reviewed as part of that process.

### Recommendation 4 - Renewable Energy Strategy

Having regard to the national requirement for a sustainable renewable energy supply and the transition to a low carbon and climate resilient society, and in particular:

- section 10(2)(n) of the *Planning and Development Act 2000*, as amended;
- the importance attributed to climate action by Government policy, as evidenced by, inter alia, the recent *Climate Action and Low Carbon Development (Amendment) Act 2021*, the *Climate Action Plan 2023*;

## Recommendation 4 - Renewable Energy Strategy

- NPO 54 to integrate climate action into the planning system in support of national targets for climate policy mitigation and adaptation objectives, as well as targets for greenhouse gas emissions reductions;
- NPO 55 to promote renewable energy use and generation at appropriate locations;
- RPO 4.17 to position the region to avail of the emerging global market in renewable energy;
- the forthcoming Methodology for Local Authority Renewable Energy Strategies;
- the *Development Plans, Guidelines for Planning Authorities (2022)*; and
- the *Wind Energy Development Guidelines (2006)*,

the planning authority is required to:

- (i) amend objective O-REN-1 in Chapter 31 of the draft Plan to commit to the preparation of a renewable energy strategy for the county and to a variation of the County Development Plan to incorporate its recommendations into the adopted Plan within one year of the publication of the Methodology for Local Authority Renewable Energy Strategies;
- (ii) the landscape character map in the draft Plan which dates from 1996 should be reviewed in tandem with the preparation of the renewable energy strategy;
- (iii) include additional policies / objectives in the draft Plan which support a broad spectrum of renewable energy developments; and
- (iv) provide additional policy direction for renewable energy development in the draft Plan including the development management standards in Chapter 31 consistent with the policies and guidelines referenced above.

## Response

### 17.A Promoting a broad spectrum of renewable energy developments (R.4 iii & iv)

Chapter 31 Energy and Telecommunications (Volume 3 of the Draft Plan) includes a substantial section (31.1) on renewable energy, addressing mainly wind energy developments, but also other forms of renewables.

Responding to the Electricity Supply Board (Submission 109), the Chief Executive has recommended a number of amendments to Section 31.3, relating to marine renewable energy, solar energy, hybrid renewables etc. Relevant amendments have also been recommended in respect of Chapter 33 (Development management standards).

**It is considered that no further change to the Draft Plan is required in relation to broadening the spectrum of renewable energy developments.**

### 17.B Renewable Energy Strategy

In Chapter 31 Energy and Telecommunications, Section 31.2. 2 indicates Sligo County Council's commitment to preparing a Renewable Energy Strategy, as specified in Action 28 under Goal 3/Objective 3.1 of the Sligo 2030 Local Economic and Community Plan (LECP). This commitment is repeated in Section 31.3.1 Wind energy and translated into objective O-REN-1.

Like the OPR, the Department of Environment, Climate and Communications (Submission 150) and the ESB (Submission 109) have requested the definition of a clear timeframe for the preparation of a Renewable Energy Strategy. This should be done within one year of the publication of either the Regional Renewable Electricity Strategy, or the revised Methodology for Local Authority Renewable Energy Strategies (SEAI), whichever occurs first.

### 17.C Landscape character map

It is agreed that the forthcoming Renewable Energy Strategy should be based on an updated Landscape Character Assessment. A relevant objective should be included in Chapter 23 Landscape character.

## Recommendations

**CE-31-08** In **Chapter 31 Energy and telecommunications** (Volume 3 of the Draft Plan), amend the renewable energy objective O-REN-1 as follows:

**O-REN-1** Prepare a Renewable Energy Strategy for County Sligo **during the life of the Development Plan, following within one year of** the publication of the Regional Renewable Electricity Strategy (NWRA) **and or** the revised Methodology for Local Authority Renewable Energy Strategies (SEAI), as provided for in the Climate Action Plan **2023 2024, whichever occurs first.**

**CE-23-01** In **Chapter 23 Landscape character** (Volume 3 of the Draft Plan), include an additional landscape character protection objective as follows:

**O-LCP-3** Prepare an updated Landscape Character Assessment for County Sligo in conjunction with the forthcoming Renewable Energy Strategy (refer to objective O-REN-1 in Chapter 31).

## Issue 18 - Flood risk management

The Office welcomes the preparation of a Strategic Flood Risk Assessment (SFRA) and the supportive policies and objectives to mitigate flood risk, including P-FRM-2 and P-FRM-5.

- A. The Office also acknowledges the identification of flood risk zones as a key informant to the land use zoning in the draft Plan. However, while site specific maps have been illustrated in the SFRA to show which lands are at risk of flooding, these have not been overlaid on the land use zoning maps. It is difficult therefore to fully understand the implications of flood risk across the draft Plan area, and the planning authority is advised to overlay the future scenario mapping on the land use zoning maps in order to provide clarity on areas at risk from climate change.
- B. In addition, there appears to be some errors in the transposing of the flood risk datasets into the Flood Zones such as small omissions of areas and the use of the incorrect probability extents. For example, the full extent of the flood risk area affecting the Business, Industry and Enterprise (BIE) lands at Ballytivnan does not appear to be shown. The planning authority should review and compare the flood mapping and the probability extents for all areas, in consultation with Office of Public Works (OPW) including specific sites at Ballinacarrow, Ballincar, Ballygawley, Ballymote, Ballysadare, Castlebaldwin, Cliffony, Geevagh, Gorteen, Grange, Rathcormac, Sligo Town, and Strandhill.

## Recommendation 5 - Flood Risk Management

Having regard to flood risk management, and in particular,

- NPO 57 requiring implementation of *The Planning System and Flood Risk Management Guidelines for Planning Authorities* (2009) and integration of sustainable water management solutions; and
- RPO 3.10, flood risk management and integration of sustainable water management solutions,

the planning authority is required to:

- i. overlay the flood zones maps and future scenario maps with the land use zoning maps in the draft Plan; and
- ii. review and amend the flood zone maps to ensure the correct datasets and probability extents have been illustrated. In instances where the flood extents encroach into incompatible land use zonings, a Justification Test should be prepared in accordance with the Flood Guidelines. Where lands fail to meet the criteria of the Justification Test, the planning authority must rezone lands for water compatible or appropriate uses only. Particular attention is required for the specific sites identified by the OPW including lands at Ballinacarrow, Ballincar, Ballygawley, Ballymote, Ballysadare, Castlebaldwin, Cliffony, Geevagh, Gorteen, Grange, Rathcormac, Sligo Town, and Strandhill.

The planning authority is advised to liaise with the OPW to address this recommendation.

### Response

The recommendation is noted and agreed. The OPW has made similar comments in Submission 73. It is not considered opportune to include Flood Zones A and B on zoning maps, because this will make them more difficult to read. Overlay maps should be included, however, in the final, consolidated SFRA Report.

Additional "Objectives Maps" should be prepared for each zoned settlements (except Sligo Town, which already has an Objectives Map), and these maps should show the Flood Zones A and B in addition to plan limits, development limits and any specific objectives.

All flood zone maps subject to Submission 73, received from the Office of Public Works, should be modified as per the relevant Chief Executive's recommendations to the respective issues (Submission 73, Issue 9 to Issue 21).

### Recommendations

**CE-FZ-01** Show the **Flood Zones A and B** on additional **Objectives Maps** for zoned settlements.

**CE-SFRA-01** Prepare overlay mapping for the final, consolidated Strategic Flood Risk Assessment document, with Flood Zones A and B overlain on final land use zoning.

## Issue 19 - Environment, heritage and amenities

The Office of the Planning Regulator:

- welcomes the inclusion of policies and objectives for the protection and conservation of the county's built heritage including archaeological sites, architectural conservation areas and protected structures as set out in Chapter 24.
- welcomes the inclusion of Appendices B–H which include buildings of note, designated scenic routes, designated nature conservation areas, biodiversity sites, geological heritage sites, national monuments and public rights of way;
- commends the planning authority for the inclusion of Appendix H as well as the associated mapping which clearly illustrates the public rights of way.

That being said, following a review of Appendix B Buildings of Note, there appears to be a discrepancy in the numbering for sites identified within the settlement of Ballysadare whereby BoN No. 7 appears to have been omitted from the schedule. The planning authority should review the Buildings of Note schedule and ensure that all sites have been included and appropriately numbered in Appendix B.

### Observation 6 – Built Heritage

Having regard to

- section 10(2)(f) of the *Planning and Development Act 2000*, as amended, concerning protection of natural and built heritage; and
- National Strategic Outcome 7 - Enhanced Amenities & Heritage,

the planning authority is requested to review Appendix B to ensure that an accurate schedule of all Buildings of Note is included in the Draft Plan and nothing has been omitted in error.

## Response

The positive comments are noted.

In **Appendix B Buildings of Note**, the Ballysadare section lists two items as “BoN No. 8”, one at the bottom of page 4 (Three-bay, two-storey house) and the second one at the top of page 5 (two-bay, two-storey house).

This is due to a typographic error, which shall be rectified.

## Recommendation

**CE-B-01** In **Appendix B Buildings of Note**, on **page 4**, replace the code “**BoN No. 8**” for the “three-bay-two-storey house in Ballysadare with “**BoN No. 7**”.

## Issue 20 - Environmental Assessments

The Office notes the preparation of the Strategic Environmental Assessment (SEA) and Natura Impact Report (NIR), attached to the draft Plan, in accordance with statutory requirements.

In relation to Appropriate Assessment, the Office notes the conclusion of the NIR, which states

*Having incorporated mitigation measures into the Draft Plan, it has been demonstrated that the Draft Plan is not foreseen to give rise to any significant adverse effects to designated European sites, alone or in combination with other plans or projects.*

With regard to the SEA, the structure of the report prepared is consistent with the guidance set out in the *Strategic Environmental Assessment, Guidelines for Regional Assemblies and Planning Authorities (2022)*.

### Response

**The comments are noted. No changes to the Draft Plan, SEA ER or NIR are required on foot of the above.**

## Issue 21 - Implementation and monitoring

The Office notes that no provision has been made for monitoring the implementation of the draft Plan. The inclusion of a clear monitoring strategy of key plan objectives will enable the planning authority to be more effective in implementing the draft Plan, including considering the obligations under section 15 of the Act.

The Office advises that implementation and monitoring would be best to focus on the anticipated or proposed key outcomes of the draft Plan, as determined by the planning authority, such the core strategy e.g. housing delivery and population growth in Sligo Town.

In this regard, section 10.3 of the *Development Plans Guidelines* sets out guidance on the best practice for meaningful monitoring of plan-implementation through core strategy monitoring and plan objective monitoring.

### Observation 7 – Implementation and monitoring

Having regard to section 10.3 of the *Development Plans, Guidelines for Planning Authorities (2022)*, the Office advises the planning authority to include a monitoring strategy for implementation of the draft Plan.

### Response

The observation is noted and agreed.

### Recommendation

**CE-03-06** In **Chapter 3 Core Strategy Statement**, include an additional section as follows – see *recommended new section on the next page*

## 3.4 Monitoring the implementation of the Plan's objectives

In accordance with the Planning and Development Act 2000 (as amended), the Chief Executive of the Planning Authority shall “give a report to the members of the authority on the progress achieved in securing the objectives” of the Development Plan not more than two years after the making of the Plan. This implementation report must reflect the output of a monitoring system which is partly in place, but needs to be updated to comply with the most recent guidance.

The Development Plan Guidelines (2022) clarify that the monitoring task of the Planning Authority comprises two elements: annual **Core Strategy monitoring** and biennial **Plan objectives monitoring** (including SEA monitoring).

### 3.4.1 Core Strategy monitoring

Supporting the provision of new housing in accordance with the Settlement Strategy is one of the main roles of the Development Plan. Residential development trends will be monitored at settlement level, in order to assess its consistency with the housing allocations set out in the Core Strategy of the Plan.

The data required for monitoring will be extracted from the Development Management databases, then analysed and mapped using the Council's GIS capabilities. Additional data, where necessary, will be obtained from external sources, such as the CSO.

The annual Core Strategy monitoring will use the indicators listed in **Table 3.4 (below)**, which are based on the recommendations of the Development Plan Guidelines. The output will be an **Annual Development Plan Monitoring Report**, which will be made available to the elected members and published on the Council's website.

**Table 3.4 Indicators for Core Strategy monitoring of settlements and rural areas**

Indicator	
<b>Residential development</b>	
<b>1</b>	New home completions – total number
<b>2</b>	Percentage of houses permitted on brownfield sites, including renovation of derelict houses (in rural areas) Percentage of houses permitted on brownfield sites, including conversion of unused or derelict premises in urban areas (towns and villages)
<b>3</b>	Planning permissions granted for residential development with: <ul style="list-style-type: none"> <li>i. A breakdown of developments of 1, 2, 3 and 4+ units permitted</li> <li>ii. A breakdown by unit size (number of bedrooms)</li> </ul>
<b>4</b>	Planning applications by <b>type of rural area</b> (outside zoned lands) with: <ul style="list-style-type: none"> <li>i. Total number of applications received in Rural Areas under Urban Influence (RAUI), Remote Rural Areas (RRA) and the rural areas located within <b>5 km</b> of the N-4 (realigned route)</li> <li>ii. A breakdown by type of decision</li> </ul>

<b>Indicator</b>	
<b>Commercial development</b>	
<b>5</b>	<p>Planning permissions for business/employment uses in the following categories, including number of permissions and total floorspace:</p> <ul style="list-style-type: none"> <li>i. Offices</li> <li>ii. Industrial / enterprise development</li> <li>iii. Retail development</li> <li>iv. Warehousing (non-retail) and logistics</li> </ul>
<b>Settlement consolidation sites</b>	
<b>6</b>	<p>Specific reporting on the progression of the Settlement Consolidation Sites identified in the development plan. This should include information on enabling infrastructural services delivery, planning permissions granted, housing constructed, funding applications made, project timelines, Vacant Site Levy commentary etc. (as per the Development Plan Guidelines 2022)</p>

### 3.4.2 Plan objectives monitoring

The majority of objectives contained in the Development Plan have been formulated in a manner that allows their monitoring over the lifetime of the plan. While in general the objectives are specific, measurable and realistic, not all of them have a precise timeframe, due to a variety of factors (e.g. uncertainty regarding funding from external sources).

In addition, the monitoring of the significant environmental effects of the Plan's implementation is a statutory requirement of the SEA Directive. SEA monitoring typically entails measuring established indicators on a regular basis, during the lifetime of the plan. The SEA Environmental Report which accompanies the Development Plan contains detailed indicators and targets for the monitoring of Strategic Environmental Objectives (SEOs) – refer to Table 5.1 in Section 5 Strategic Environmental Objectives (p. 81-84 of the SEA ER).

The outcome of the above monitoring process will be included in the Chief Executive's **Two-Year Progress Report**, required under Section 15(2) of the Planning and Development Act 2000 (as amended).

## Section 5.

### Submission 103 – Northern and Western Regional Assembly

<https://consult.sligococo.ie/en/submission/slg-c29-103>

Section 27B of the Planning and Development Act 2000 (as amended) requires the Northern and Western Regional Assembly (NWRA) to offer its opinion on whether the Draft Plan and its core strategy are consistent with the Regional Spatial and Economic Strategy (RSES) and its objectives. The NWRA is required to make recommendations to the Planning Authority on any amendments necessary to ensure the Draft Plan is consistent with the RSES.

The NWRA indicates that “the draft Plan and accompanying documents are a comprehensive suite of documents and Sligo County Council is to be commended for the extensive preparation, and consultation which went into preparing all the documents”.

“Overall, it is considered that the Draft Plan demonstrates a high degree of consistency when measured against the Regional Spatial and Economic Strategy. However, the Assembly considers the Plan could be enhanced to achieve greater Policy alignment with the inclusion of the Recommendations, and Observations set out” in the submission.

“The Assembly views the minimum demographic / housing targets together with associated economic advancement and service provision for Sligo Town as a designated Regional Growth Centre to be of fundamental importance in redressing the growing Regional economic disparity between the Northern & Western Region, and the other Regions in Ireland”.

The submission of the NWRA contains **nine recommendations** and **six observations**.

In addition, the submission includes several **general comments**, which are summarized at the end of this section, after addressing the **recommendations** and **observations**.

## Recommendations of the NWRA

### Issue 1 – Sligo Town population target for 2030

The NWRA notes that the Draft Plan sets a 2030 population target of 23,800 for Sligo Town, instead of a minimum of 25,360 (corresponding to the RSES target of 25,800 by 2031).

**NWRA Recommendation 1** requests: “That the Plan is amended to adjust the population targets for Sligo town from 23,800 to 25,360 so that it is consistent with the target set out in RPO 3.7.37 of the RSES. The review should also include a reappraisal of the necessary residential zoning to ensure adequate serviced land is available in Sligo town to accommodate any revised population targets and required housing units as set out in RPO 3.7.38 (provision of 3,000 to 5,000 residential units to accommodate the additional population envisaged by 2040).”

## Response

The Chief Executive has already addressed the Sligo Town population target, zoning land and housing allocation as part of the response to the OPR (Submission 184, Issue 2). Please refer to [CE-03-01](#), [CE-03-02](#) and [CE-05-01](#).

**No further change to the Draft Plan is required in respect of the above.**

## Issue 2 – Student accommodation

It is not clear if the draft Plan accommodates growth for student accommodation in private-rented units outside of student villages over the Plan period, although there are references to accommodation in objective SO-RGC-7 (masterplan for the City Campus site – Sligo's Cultural and Learning Hub) and in the Housing Strategy.

**NWRA Recommendation 2** requests: "That the Plan is reviewed to confirm provision is made in future housing units and zoning for private-rented student accommodation to support the growth of ATU Sligo – a strategic Regional asset, which will be vital in growing the Region by providing access to skills, research career development and innovation."

## Response

In chapter 26 Residential development, Section 26.3 indicates the Council's recognition of diverse accommodation needs, including students' needs. Furthermore, housing policy P-DN-HOU-6 clearly supports the provision of purpose-built and designed student accommodation in appropriate locations.

However, it is agreed to include an additional subsection explicitly supporting the provision of such accommodation.

## Recommendation

**CE-26-08** In Chapter 26 Residential development, Section 26.3 Housing for persons with diverse needs, include the following additional text:

### 26.3.4 Student accommodation

In April 2022, IT Sligo, GMIT and Letterkenny IT merged to form the Atlantic Technological University (ATU). ATU Sligo, comprising St Angela's College and the former IT Sligo, had a combined enrolment of 10,200 students (8,600 and 1,600 respectively) for the academic year 2022/23.

There are seven purpose-built student villages serving these students, all are within a short walking distance of the colleges, with over 2,000 bed spaces available. While many students commute to college from outside Sligo Town and even County, demand for accommodation in the private rented sector is strong.

Given future growth in student numbers, ATU Sligo will continue to represent a significant part of the demand for private rented accommodation in Sligo town. This demand can be met either on-campus or in its vicinity, on lands zoned for residential and mixed uses.

Sligo County Council will support the provision of student accommodation both on campus and off campus.

## Issue 3 – Serviced sites in towns and villages

The NWRA notes that Sligo County Council has not engaged in implementing the Ready to Build Scheme, as all lands in the ownership of the Local Authority were committed in the Housing Delivery Action Plan 2022-2026. It is the intention of RPO 3.7 to “encourage and support local authorities in identifying and prioritising a program for the provision of serviced sites within smaller towns and villages within 1 year of the adoption of the RSES”. The objective further states: “A rolling 2-year implementation plan shall subsequently be prepared.”

**NWRA Recommendation 3** requests: “That the Plan provides detail, including timelines, in prioritising a program for the provision of serviced sites within smaller towns and villages to ensure the plan is consistent with RPO 3.7 of the RSES.”

### Response

The **Ready to Build Scheme: Serviced Sites for New Homes Croí Cónaithe (Towns) Fund (Scheme Outline)** was published in 2022, after the Local Authority had already committed all lands in its ownership to the Housing Delivery Action Plan 2022-2026. The Council is currently engaged in identifying suitable sites for the Ready to Build Scheme. A programme for the provision of serviced sites in smaller towns and villages will be prepared within one year of the adoption of the Development Plan. A corresponding strategic housing objective should be included in Chapter 6 Housing delivery strategy.

### Recommendations

**CE-06-03** In **Section 6.5 Housing land provision** (Chapter 6 Housing Delivery Strategy, Volume 1 of the Draft Plan), insert the following narrative:

#### **Ready to Build Scheme**

The **Ready to Build Scheme** under the **Croí Cónaithe (Towns) Fund**, to be delivered by local authorities, provides new choices for people to live in towns and villages in Ireland. Stream 1, launched in 2022, provides grant funding to support the refurbishment of vacant properties.

Stream 2 will see local authorities make available serviced sites at reduced cost to support self-build home ownership. Under Stream 2, local authorities will make serviced sites in towns and villages available to potential individual purchasers. These sites will be available at a discount on the market value of the site for the building of a property for occupation as the principal private residence of the purchaser.

It is intended that Sligo County Council will prepare a programme for the acquisition of suitable sites and make them available for development by providing services and access to these sites.

**CE-06-04** In **Chapter 6 Housing Delivery Strategy** (Volume 1 of the Draft Plan), insert an additional strategic housing objective as follows:

**SO-HOU-3** Prepare a programme for the acquisition of suitable sites in small towns and villages under the **Ready to Build Scheme** and commence its implementation within one year of the adoption of the Development Plan.

## Issue 4 – Timeframe for the Eastern Garavogue Bridge

The submission notes that while RPO 3.7.40 (*Enhance intra-urban access by providing an additional north-south connection through the Eastern Garavogue Bridge and Approach Roads Scheme, to be completed by 2021*) has not been achieved, the Draft Plan includes a strategic objective (SO-RGC-1) and a regional and local roads objective (O-RLR-2) seeking to achieve this. SO-RGC-1 includes a timeframe associated with its delivery - i.e. within the lifetime of the Plan. However, objective O-RLR-2 does not include a timeframe.

**NWRA Recommendation 4** requests: "That the Plan is amended to include a timeframe in respect of objective O-RLR-2 (Vol 3 p.95) similar to SO-RGC-1 (Vol 1 p.31) to achieve delivery of RPO 3.7.40 of the RSES i.e. Eastern Garavogue Bridge and Approach Roads Scheme".

### Response

The comments are noted. The project's progress to date includes confirmation of compulsory purchase order and some advance works. It is the Council's intention to complete detailed design of the scheme and progress to tender stage during 2024, with a view to commencing construction during 2025.

While it is envisaged that the scheme will be delivered within the lifetime of the Plan, there are a number of variables outside the control of the Planning Authority. Therefore, it is not considered appropriate to include the suggested timeframe within the Plan.

**No change to the Draft Plan is recommended.**

## Issue 5 – Areas considered for renewable energy development

The submission notes that the plan would benefit from "an analysis of areas suitable for renewable energy development and inclusion of spatial designations which identify areas suitable for renewable energy, open to consideration or not suitable as required".

**NRWA Recommendation 5** requests: "That the Plan is amended to include modifications to Volume 3, which includes additional Land-use clarification via mapping and associated policies which identify established areas / areas for repowering / potentially open to consideration / not favoured areas for renewable energy development.

### Response

The above recommendation is equivalent to a request to produce an alternative Landscape Characterisation Map, which would not be possible in the absence of a fully revised Landscape Character Assessment. Responding to **OPR's Recommendation 4** (regarding Landscape Character Assessment), the Chief Executive has proposed the inclusion of an additional objective, O-LCP-3, in Chapter 23 Landscape Character – refer to [CE-23-01](#).

In the interim period, applications for renewable energy developments will be assessed in accordance with the Energy policies P-EN-1 and P-EN-2 (in Chapter 31 Energy and Telecommunications, Volume 3 of the Draft Plan), the relevant Section 28 Guidelines and the criteria set out in Section 33.11 (Chapter 33 Development Management Standards).

**No further change to the Draft Plan is required on foot of the above.**

## Issue 6 – Jobs and land zoned for business, industry and enterprise in Sligo RGC

While an Economic Strategy and Retail Strategy are included in the draft Plan and lands have been zoned for Business, Industry and Enterprise it appears that there are no calculations of land or assessment of service provision for such lands. The Assembly indicates that it is critical to ensure an adequate amount of serviced employment lands are available for future growth, in order to achieve the target of 17,000 jobs by 2040 in the Regional Growth Centre, as set in RPO 3.7.57.

**NRWA Recommendation 6** requests:

- (a) That the Plan considers the NPF and RSES ambition in respect of Population to Jobs Ratio (3:2), given the recent Census Results for Sligo wherein the population figure for the County is now marginally below that assigned via the NPF implementation Roadmap (July, 2018), and the implications of same for Sligo as a Regional Growth Centre.
- (b) Arising from 6(a) that the Plan be amended to include an analysis of land required for business, industry and enterprise zoning. The revision may consider an analysis of the extent of land required with the associated service provision of proposed areas to assist in achieving RPO 3.7.57 of the RSES (an increase in the number of jobs in the Regional Growth Centre to 17,000 by 2040). Where additional land is required within a settlement, it is suggested that locations are selected to comply with RPOs in the RSES and where the lands are currently not serviced, policies/objectives are included in the draft Plan to actively pursue servicing of the land within the lifetime of the Plan.

### Response

**Section 7.3 Spatial planning for economic development** (in Chapter 7 Economic Strategy) lists the key components of the Council's multi-pronged approach to promoting economic development. It is agreed that this section should include an estimation of the number of jobs that need to be supported during the life of the Development Plan.

With regard to the suggested analysis of land required for business, industry and enterprise zoning, it is noted that no methodology has been published to date, but the Development Plan Guidelines 2023 contain a "Worked Example (from Dun Laoghaire Rathdown County Development Plan 2016)".

The steps followed in this Worked Example can be applied to County Sligo. The resulting calculations indicate that there is more than sufficient land zoned for business and enterprise in the County, with a clear concentration in the Sligo Regional Growth Centre.

It is considered that no additional lands are required to be zoned for business, industry and enterprise.

### Recommendations

**CE-07-01** In **Chapter 7 Economic Strategy, Section 7.1.1 RSES Growth Ambition 1**, include the following paragraph at the end of the section:

Noting that NPF's National Policy Objective 1 envisages 115,000 additional jobs for 180,000 additional population in the Northern and Western Region, the RSES sets a target of 0.66:1 jobs to population (S. 3.4 Urban Places of Regional Scale).

**CE-07-05** In Chapter 7 Economic Strategy, Section 7.3 Spatial planning for economic development, insert additional subsection as follows:

### **Zoning land for business, industry and enterprise**

Having regard to the envisaged County population increase of circa 6360 people by 2030, and a labour force participation rate of circa 66% (much higher than the 58.3% recorded by Census 2022 for County Sligo), it would be reasonable to expect circa 4,200 jobs to be needed by the end of the Plan period. Assuming that:

- new jobs will be created in the same proportions as the current ones – i.e. 75% in Services, 20% in Industry and 5% in Agriculture, AND
- employment in education/healthcare/public administration will continue to represent circa 35% of the total,

it will be necessary to accommodate a minimum of 20% (Industry) to a maximum of 60% (Industry plus Services excluding education/health/public administration) of the total number of new jobs on lands zoned BIE.

The maximum number of 2,520 jobs (60% of 4,200) would require a maximum floorspace of 126,000 sq.m if such jobs were all in manufacturing (using an estimate of 50 sq.m per employee, as exemplified in the Development Plan Guidelines 2023, p. 125). Applying a blanket plot ratio of 0.5, the amount of land needed for BIE would be circa 252,000 sq.m, i.e. 25.2 ha for the entire County.

The Draft Plan zones circa 290 ha for business, industry and enterprise purposes in 18 settlements. Most of these lands – approximately 205 ha – are located strategically within the Regional Growth Centre area, particularly in Sligo Town (198 ha), and are capable of supporting far in excess of 2,500 industrial/enterprise jobs.

## **Issue 7 - flood risk zones**

The submission states that “The Flood Risk Assessment for the County identifies zoned lands that failed assessment”. While justification for including these lands has been provided, Sligo County Council should reconsider if it is appropriate to zone all these lands, having regard to RPO 3.10 and RPO 3.11 of the RSES that relate to flood risk management.”

**NWRA recommendation 7** requests: “That the planning authority review lands in flood risk zones, to align with flood risk management aims set out in RPO 3.10 and RPO 3.11 of the RSES.”

## **Response**

The recommendation is similar to one of the observations made by the Office of Public Works (OPW) in Submission 73. The Chief Executive has proposed several amendments on foot of these observations – refer to the CE’s response to Submission 73.

**No further changes to the Draft Plan are required.**

## Issue 8 – Landscape Characterisation Map

The submission notes that Landscape Character Map appears to be based on a landscape study completed in 1996 and it does not incorporate a Seascape Assessment. Notwithstanding any pending National or Regional landscape appraisals, Sligo County Council “may wish to review the position in relation to preparing a new Landscape Appraisal for the county”.

**NWRA Recommendation 8** requests: “That the Plan is amended to include within the Core Strategy, and perhaps in Volume 3 in further detail, a clearly defined objective for the review and preparation of a new Landscape Appraisal for the county. It is suggested such a review should commence within the first year of the adoption of the draft Plan. This would assist in the implementation of RPO 5.2 of the RSES.”

### Response

The above recommendation is similar to **NWRA’s Recommendation 5** and to **OPR’s Recommendation 4**.

Responding to **OPR’s Recommendation 4**, the Chief Executive has proposed the inclusion of an additional objective, O-LCP-3, in Chapter 23 Landscape Character – refer to **CE-23-01**.

**No further change to the Draft Plan is required in respect of the above.**

## Issue 8 – Housing vacancy rate and rural brownfield sites

The submission notes that County Sligo’s level of residential vacancy “is high, and sits at circa 20% (Census, 2022)”. The Assembly considers that RPO 3.3 should be reflected in the Strategic Housing Policies at a local level.

**NWRA Recommendation 8** requests: “That Chapter 06 of the Plan (Strategic Housing Objectives) is expanded to include additional measures to reduce the 20.1% housing vacancy level recorded in Census 2022 to give effect to RPO 3.3 where a minimum of 20% of new rural housing will be delivered on brownfield sites”.

### Response

The residential vacancy rate in County Sligo, as recorded by Census 2022, was **11.8%**, not 20.1%. This is lower than the vacancy rates in the neighbouring counties of Leitrim (15.5%), Roscommon (13.4) and Mayo (13.3%).

The Council’s own surveys indicate that the real level of vacancy is much lower (circa 5%) than the Census-recorded level, both in urban and in rural areas.

At the same time, it is agreed that Chapter 6 Housing delivery strategy should include a strategic objective reflecting RPO 3.3, with a view to further reducing rural housing vacancy rates.

### Recommendation

**CE-06-05** In **Chapter 6 Housing Delivery Strategy** (Volume 1 Core Strategy), insert an additional strategic housing policy as follows:

**SP-HOU-4** Pursue the delivery of at least 20% of all new housing in rural areas on brownfield sites, in accordance with Regional Policy Objective RPO 3.3.

## Observations of the NWRA

### **Issue 9 – Cross-referencing**

The submission indicates that the draft plan would benefit from cross-referencing to aid navigation, as certain topics are located within several chapters.

**NWRA Observation 1** suggests: “That the Plan incorporates cross-referencing of topics across the plan”.

#### **Response**

The observation is noted. Cross-referencing will be provided when the final, adopted version of the Development Plan is prepared for publication.

**No change to the Draft Plan is required at this stage.**

### **Issue 10 – Census 2022 data**

The submission notes that a considerable amount of data is from the 2016 Census, except for some population data. This data will be 8 years old on publication of the adopted Plan.

**NWRA Observation 2** suggests that “A review and updating of all documentation with current available data/information that is emerging, through for example Census 2022, be undertaken”.

#### **Response**

Most of the 2022 Census data had not yet been published in 2023, before the completion of the Draft Plan. It is intended to update relevant figures as per Census 2022 published reports before the publication of the adopted Plan.

**No change to the Draft Plan is required at this stage.**

### **Issue 11 – Tourist attraction in Sligo Town**

The submission notes that the Draft Plan does not identify a major tourist attraction in Sligo town, as supported in part of RPO 3.7.56 of the RSES. Reference is made to Sligo Gaol in the draft Plan, but it is not clear if this is the proposed major tourist attraction.

**NWRA Observation 3** requests: “That the Plan should be amended to incorporate an objective/policy to explore the delivery of a tourist attraction(s) of scale within Sligo town as part of the draft Plan and this may be examined further in the proposed Sligo & Environs Local Area Plan”

#### **Response**

In Section 28.3 Tourism development (Chapter 28 Economic development), Table 28.2 lists three opportunities for cultural tourism in Sligo Town (and immediate environs) that have the potential to become tourist attractions of scale on their own or combined, as part of the “Sligo Experience”: the Yeats Experience, Sligo Gaol and Hazelwood Demesne.

There is no objection to further supporting the relevant projects listed in Table 28.2 by including an additional tourism development objective, complementing the existing one which refers to a “flagship visitor attraction in the County”.

## Recommendation

**CE-28-12** In **Section 28.3 Tourism development (Chapter 28 Economic development**, Volume 3 of the Draft Plan), include an additional tourism development objective as follows:

**O-TOU-2** Explore, in co-operation with Failte Ireland, the development of a tourist attraction of scale in Sligo Town, as part of the preparation of the Sligo Town Local Area Plan.

## Issue 12 – Plan’s vision for the County

The submission notes that “reference is made to the draft Plan providing a spatial planning framework designed to support the economic and social development of the County as envisioned in the *Sligo 2030* strategy document (Local Economic and Community Plan), however there is no defined overall vision for the future development of County Sligo.”

**NWRA Observation 4** suggests that “A revision of the Introduction (Chapter 1) to the Plan should be undertaken to clearly convey an all of County vision for the lifetime of the Plan period and associated strategic objectives to be included at the beginning of the Plan”.

## Response

On page 1 in Chapter 1 (Introduction) of Volume 1 of the Draft Plan, a text box is placed right above the main heading, containing the following vision statement:

**A vision for County Sligo in 2030:** a smart, sustainable and socially inclusive Sligo; one that cherishes its vibrant communities, protects and celebrates its unique environment and rich culture, and is a champion of innovative growth and development. (*Sligo 2030: One Voice, One Vision – Local Economic and Community Plan 2023-2030*)

**No change to the Draft Plan is required on foot of the above observation.**

## Issue 13 – TEN-T Comprehensive Network

The submission notes that “the State is required by the European Commission to have all Ten–T Comprehensive Networks upgraded to an appropriate standard of service by 2050, and if the aforementioned schemes are not advanced to pre-appraisal stage in the near future, there will be a concern as to the ability of TII to deliver the necessary upgrades along the Atlantic Economic Corridor”.

**NWRA Observation 5** requests that “Chapter 09 of the Plan to be reviewed to include revised text on the completion of the necessary upgrades of the Ten-T Comprehensive Network to enable delivery before 2050, as required under EU Regulation<sup>5</sup> in respect of the N-17 and N-15 Route Upgrades – and as envisaged in RPO 6.7 and RPO 6.8”.

## Response

The delivery by the State – through the TII – of the upgrades to the TEN-T/Trans-European Comprehensive Transport Network by 2050 is outside the scope of Sligo County Development Plan 2024-2030.

Chapter 9 Transport Strategy makes appropriate reference to the TEN-T in the introduction to Chapter 9, including details in a footnote on page 71 of Volume 1.

**No change to the Draft Plan is required on foot of the above observation.**

## Issue 14 – Review and implementation of the Plan

The submission notes that the current planning legislation provides for a progress report to be prepared two years following the adoption of the Plan and suggests that the Draft Plan should include a reference to this report, including key performance indicators. It is also suggested that that more objectives of the Draft Plan should have specific timelines for implementation.

**NWRA Observation 6** requests: “that the Plan should incorporate the inclusion of a Review and Implementation Strategy for the Plan, which includes key performance indicators and timelines. It is considered appropriate that objectives are accompanied by clear timelines, whether short, medium or long term.”.

## Response

The above observation is similar to the OPR’s comments on Plan implementation and monitoring.

In response to **OPR’s Observation 7** the Chief Executive has proposed the inclusion of an additional **Section 3.4 Monitoring the implementation of the Plan’s objectives** in Chapter 3 Core Strategy Statement – refer to **CE-03-06** (Submission 184/Issue 21).

**No further change to the Draft Plan is required on foot of the above observation.**

## General comments of the NWRA

### **Issue 15 – Content and layout**

The submission notes that “the draft Plan as presented is very lengthy, which has become the norm with all development plans, as noted in reports on other draft development plans” and “there may be an opportunity to reduce the extent of text through the use of graphs, charts, engaging infographics and maps.”.

#### **Response**

The Draft Plan addresses all the legal requirements in terms of contents in a clear and concise manner, both in the written statement and in the maps. Additional “graphs, charts, engaging infographics” would only make the Plan longer, without providing any notable contribution to Plan strategies, policies and objectives.

**No change to the Draft Plan is required.**

### **Issue 16 – Illustrating compliance with the RSES**

The NWRA notes that throughout the Draft Plan there are references to the RSES and the relevant RPOs. Chapter 4, Sligo Regional Growth Centre Strategic Plan, clearly identifies all the relevant RPOs in the RSES as well as the Draft Plan’s compliance with them. The submission states: “This is a welcomed approach”.

#### **Response**

The positive comments are noted.

### **Issue 17 – Sligo Local Area Plan**

The NWRA notes the Council’s intention to prepare a Local Area Plan for Sligo and Environs, the preparation of a Local Transport Plan (LTP) and the “encouraging” fact that a number of sustainable mobility projects have already been rolled out across the Town, the E-Bikes Scheme being one example where modal shift away from single car trips can be successfully achieved.

#### **Response**

The positive comments are noted.

### **Issue 18 – Regional Ambitions – “a work in progress”**

In addition to the LTP, the Assembly notes that “a significant number of the objectives in the RSES relating to Sligo have already been achieved (e.g. RPO 3.7.41 Western Distributor Road) or are currently being implemented and this is welcomed. Where objectives have not been achieved it is noted that provisions have been made in the draft Plan to advance further projects”. “The progress of a number of such key strategic pieces of infrastructure is to be welcomed.”

#### **Response**

The positive comments are noted.

## Issue 19 – Building height study – strategic objective

The submission welcomes the strategic objective SO-RGC-2, indicating the Council's intention to carry out a building height study targeting increased housing densities in Sligo Town Centre. It is suggested that the objective should include the timeframe stated in the narrative (i.e. to be carried out in conjunction with the LAP for Sligo and Environs).

### Response

The suggestion is noted and agreed.

### Recommendation

**CE-04-01** In Chapter 4 Sligo Regional Growth Centre, amend the strategic objective SO-RGC-2 as follows:

**SO-RGC-2** Carry out a building height study targeting increased housing densities in Sligo Town Centre [in conjunction with the preparation of a Local Area Plan for Sligo and Environs](#).

## Issue 20 – Lands at Ballytivnan and Rathbraughan

The NWRA refers to “unserved lands at Ballytivnan and Rathbraughan”, which are the subject of RPO 3.7.53 (Encourage new companies to locate on lands zoned for business and enterprise at Ballytivnan and Rathbraughan, to the North of the Urban Core). It suggests that “The Plan may benefit with the addition of a policy objective which is included in the Business, Enterprise and Industry Policies and/or Water Infrastructure chapter and any other relevant chapters to actively pursue the servicing of these lands with Uisce Éireann, the relevant roads authority and/or relevant service/infrastructure provider.”

### Response

The comments are noted. The respective lands at Ballytivnan and Rathbraughan are already serviced, but are in the private ownership of AbbVie, a multinational company. The Council intends to prioritise the development of the IDA lands at Oakfield during the life of the Plan.

**No change to the Draft Plan is required on foot of the above suggestion.**

## Section 6.

### Submission 124 – Department of Housing, Local Government and Heritage (DHLGH) – - Development Applications Unit (DAU)

<https://consult.sligococo.ie/en/submission/slg-c29-124>

The DHLGH is a prescribed body under planning legislation, and the authority with overarching responsibility for nature conservation, the nature directives and wider biodiversity. The Department's heritage-related observations/recommendations have been co-ordinated by the Development Applications Unit (DAU). The comments are made under two main headings: Nature Conservation and Archaeology.

### DHLGH's Nature Conservation recommendations

The Department welcomes the comprehensive Natural Heritage Chapter of the Sligo Draft CDP. The following observations are intended to assist the Planning Authority in meeting obligations that may arise in relation to European sites, also known as Natura 2000 sites (Special Areas of Conservation, SAC; Special Protection Areas, SPA) Natural Heritage Areas (NHA) and the protection of wider biodiversity.

#### Issue 1 - Integration of Biodiversity Protection in the CDP

While the protection of biodiversity is carefully covered in the Natural Heritage Chapter of the draft CDP, the Department notes that the Core Strategy omits a clear commitment to enshrine biodiversity protection and natural heritage protection into all other aspects of the plan.

##### DHLGH recommends:

- the inclusion of a commitment to integrate natural heritage and biodiversity protection into the core strategy, or another appropriate chapter or section such as the General Standards in the Development Management Standards Chapter;
- a proposed objective in the Core Strategy: *"Ensure that environmental assessments (AA, SEA, EIA and EclA) are undertaken for any plans and projects arising from the CDP, and require biodiversity enhancement plans for all developments."*

#### Response

Biodiversity (loss or gain) is dependent on many policies of the Plan, most notably those related to transport infrastructure, residential development, community and economic infrastructure, flood risk management etc. The protection of biodiversity has been incorporated in the respective chapters, into all relevant policies, which recognise and seek to protect Natura 2000 sites and other ecologically-important locations and corridors, as appropriate.

The inclusion in the Core Strategy of a “clear commitment to enshrine biodiversity protection” would be, therefore, redundant. (It should also be noted that Section 10(2A) of the Planning and Development Act clearly specifies in detail the required elements of a development plan core strategy, none of which relates to biodiversity.)

Furthermore, it is not considered necessary to include an objective regarding compliance with legislation regarding environmental assessments (SEA, AA, EIA), because such compliance is mandatory.

Requiring (potentially onerous) “biodiversity enhancement plans” for **all developments** would be excessive in the absence of legislation or guidelines. It is agreed, however, that the CDP should **encourage** developments to demonstrate a “biodiversity net gain”, defined as an approach that aims to leave the natural environment in a measurably better state than it was beforehand.

## Recommendations

**CE-24-09** In Chapter 24 **Natural heritage**, insert **additional text** in **Section 24.1 Biodiversity**, as follows:

The **fourth National Biodiversity Action Plan (NBAP)** states that 85% of EU protected habitats are in unfavourable status, with almost half in decline. Over half of Ireland's plants and wintering bird species are declining, and 30% of bee species are threatened with extinction. Protecting and restoring nature requires commitment across all sectors and organisations.

Local Authorities play a key role in biodiversity conservation and will aim to fully integrate it into their policies, plans and actions, thus contributing to the implementation of the EU Biodiversity Strategy and EU Nature Restoration Law.

New development should contribute to the enhancement and restoration of biodiversity by demonstrating a site-specific **biodiversity net gain** as part of the planning process. Where the site has no biodiversity value, new developments should create new habitat, with a focus on species of local and regional significance, as outlined within the **County Sligo Biodiversity Action Plan**.

**CE-24-10** In Chapter 24 **Natural heritage**, insert an additional Biodiversity policy, as follows:

**P-BD-7** Require development proposals on sites of 0.5 ha and over to demonstrate a **site-specific biodiversity net gain (BNG)**, indicating how the approach to development will leave the natural environment in a measurably better state than it was beforehand. The same approach will be encouraged, although not required, on sites under 0.5 ha.

The **biodiversity net gain (BNG)** shall consist of the enhancement and restoration of existing habitats or by the creation of new areas for wildlife, where the biodiversity value of the site is low or non-existent (e.g. certain brownfield sites).

**CE-33-27** In Chapter 33 **Development management standards**, insert an **additional subsection** in **Section 33.2.12 Site landscaping**, as follows:

### **Biodiversity Net Gain (BNG)**

Planning applications on sites with an area of 0.5 ha and over shall demonstrate a **biodiversity net gain (BNG)**. This can be achieved by applying one or more of the considerations listed below.

- The potential impact on biodiversity shall be assessed at the earliest stage possible, by carrying out ecological surveys, so that biodiversity net gain can be factored into initial plans and designs.

In addition to direct loss of habitats, biodiversity can be impacted through habitat fragmentation, loss or degradation of linear features (e.g. hedgerows, trees lines, ditches), introduction of artificial lighting, disturbance through creation of paths and access ways, increased risk of spread of invasive alien species and impacts on air and water quality.

- Restoration of existing habitats within the site shall be prioritised. For example:
  - a species-rich hedgerow should be protected from construction and operational phases with a buffer zone;
  - a dark corridor should be retained with no artificial light spillage;
  - additional planting should consolidate the link between adjacent habitat areas;
  - non-native species should be removed.
- Removal of a hedgerow and replacement with an alternative habitat (e.g. wildflower meadow) **does not** constitute a net gain in biodiversity.
- “Nature-based solutions” and the provision of green infrastructure offer opportunities for habitat creation in urban areas, such as swales, green roofs, rain gardens and tree planting.
- Removal of artificial lighting from natural habitats (e.g. river corridors, hedgerows, tree lines) can contribute to restoring areas for wildlife that were previously degraded by light spillage.

Priority shall be given to the actions that restore locally important habitats and species, as outlined in the County Biodiversity Action Plan.

## Issue 2 - Light pollution

Light pollution from outdoor artificial light at night disrupts the natural circadian patterns of humans and wildlife. As its ecological impacts is difficult to assess, the precautionary principle should apply.

Smart artificial lighting should be sensitive and restrained. Amber-coloured downward lighting with the goal of “as inconspicuous as possible” should be the objective of outdoor lighting. This applies to private and public lighting and also to lighting of buildings, schools, health centres, car parks, sports pitches, churches, signage and advertising, industrial, domestic and farm lighting.

### DHLGH recommends:

- that a **sensitive lighting plan** for County Sligo is produced, to encourage smart and minimal lighting to curtail light pollution and to reinstate Sligo’s dark sky;
- a proposed objective: *“The creation of a County Sligo Lighting Strategy within the lifetime of this CDP, and to ensure use of smart and subtle lighting for public and private new and replacement lighting”.*

## Response

Section 33.2.14 Illumination and spread of light (Chapter 33 Development management standards, Volume 3) already contains restrictive provisions on external lighting, but none of these refer to the impact of artificial lighting on biodiversity.

It is agreed that Section 24.1 Biodiversity (Chapter 24 Natural Heritage) could benefit from a new subsection addressing the impact of artificial lighting on biodiversity. Relevant policies and an additional objective should also be included, committing the Council to the preparation of a County Lighting Strategy during the life of the Development Plan.

## Recommendations

**CE-24-11** In Chapter 24 Natural heritage, Section 24.1 Biodiversity, insert a new subsection, as follows:

### 24.1.5 Artificial lighting at night

Artificial lighting is invaluable to businesses, homes, roads and recreation. Where used inappropriately or excessively, however, it causes light pollution, which alters the natural night light levels for humans, animals and plants, with adverse effects on the environment, health, biodiversity and climate both through individual development and cumulative impact.

Light pollution can unbalance the migratory, nocturnal and reproductive activity of animals, negatively impact insects and pollinators, bats, birds and fish, and disrupts natural plants growth. Over 50% of Ireland's invertebrates and 30% of vertebrates are nocturnal and need natural darkness. Lighting on hedgerows, road verges tree lines and riverbanks and waterways represents a barrier to wildlife and can restrict the passage of bats and fish.

The widespread use of LEDs has resulted in high levels of blue-rich light negatively impacting ecology, human health and sleep patterns, while cloudy skies exacerbate light pollution further by reflecting light pollution back to the ground.

There shall be a strong presumption against new lighting in naturally dark areas with a commitment to preserve and protect existing dark sky areas.

**CE-24-12** In Chapter 24 Natural heritage, Section 24.1 Biodiversity, insert three **Artificial lighting at night policies** as follows:

#### Artificial lighting at night - policies

- P-ALAN-1** Ensure that artificial lighting of public buildings and car parking areas is used only when necessary, with dark-sky friendly lighting and design. New developments shall eliminate or mitigate for potential light pollution.
- P-ALAN-2** Where artificial lighting must be used, require developments to avoid glare and light trespass on adjacent natural areas such as hedgerows, road verges, tree lines, wetlands and river corridors, using shields and appropriate lighting design.
- P-ALAN-3** Require proposals for floodlighting of playing fields/pitches to include lighting schemes with measures to mitigate for light pollution through timing and the use of shielding. All schemes shall comply with the guidance within the Institution of Lighting Professionals (ILP) Guidance Note (GN01-2021) The Reduction of Obtrusive Light.

**CE-24-13** In **Chapter 24 Natural heritage, Section 24.1 Biodiversity**, insert a new **Artificial lighting at night objective**, as follows:

### **Artificial lighting at night - objective**

**O-ALAN-1** Develop a **County Lighting Strategy** during the life of the development plan. The Strategy will include the adoption of Environmental Lighting Zones to ensure that the appropriate lighting levels are used in each zone, with protection for identified dark areas.

**CE-33-28** In **Chapter 33 Development management standards, Section 33.2.14 Illumination and spread of light**, insert an additional subsection as follows:

### **Minimising light pollution**

Lighting should be adequate for the desired area while being limited to when it is needed and directed to where it is needed.

- Average luminance should not surpass the appropriate intensity needed (not the maximum intensity).
- Lighting should be designed to avoid further impacts on biodiversity, human health, and waste of energy.
- Lighting should be designed to minimise glare, prevent light trespass to adjacent/unintended areas (hedgerows, road verges, tree lines, wetlands and river corridors).
- Light pollution should be reduced by (i) shielding to ensure lighting is directed to where it is intended and needed (ii) avoid sky glow and light trespass (iii) setting appropriate lighting levels and colour (under 3000K) (v) adjusting the timing of lighting as appropriate.
- Blue light in LEDs should be limited to warmer-coloured lighting with a correlated colour Temperature (CCT) at or below 3000K. This provides a balance of energy use, safety, and environmental and health impacts.
- Timing and duration of lighting should be limited to the when needed through trimming (part-night lighting) and dimming (reduced light levels) where appropriate.
- There should be no light emitted above the horizontal. This type of lighting impacts strongly on the environment.
- Lighting should follow the guidance within the Institution of Lighting Professionals (ILP) Guidance Note (GN01-2021) The Reduction of Obtrusive Light.

## Issue 3 - retention of biodiversity on redeveloped sites

The Department indicates that there are high level objectives for “No Net Loss of Biodiversity” for every development in the National Biodiversity Action Plan. The first priority is to retain and enhance existing biodiversity, the next one is to create new habitats. The submission indicates that the restoration or demolition of buildings or mature trees can remove vital habitat for vulnerable species.

### DHLGH recommends:

- retention and enhancement of all possible existing habitats, vegetation and breeding sites in the early design stages of the development;
- inclusion of reference to the Heritage Council’s “Wildlife in Buildings” Publication (<https://www.heritagecouncil.ie/content/files/Wildlife-in-Buildings-linking-our-built-and-natural-heritage.pdf>) and strict following of its protocols to protect threatened species;
- proposed objective: “(a) Ensure that new developments do not have a significant adverse impact on habitats and (b) Require native pollinator-friendly planting and management regimes as part of landscaping schemes for new development, including green infrastructure, large scale commercial, residential and transport development.

## Response

Biodiversity policies **P-BD-3** and **P-PD-4** in **Chapter 24 Natural heritage** seek to minimise the adverse impacts of proposed developments on existing habitats and species. It is agreed that policy P-BD-4 should include additional wording, and a **new policy P-BD-7** shall be included, with a reference to the **Heritage Council’s Wildlife in Buildings publication**.

Furthermore, **Section 33.2.12 Site landscaping** (in Chapter 33 Development management standards) should be renamed “Site landscaping and retention of biodiversity” and should include an additional bullet point relating to pollinator-friendly planting and management.

## Recommendations

**CE-24-14** In **Section 24.1 Biodiversity** (Chapter 24 Natural Heritage, Volume 3), amend the **Biodiversity policy P-BD-4** as follows:

- P-BD-4** Minimise adverse impacts of proposed developments on existing habitats (whether designated or not) by including mitigation and/or compensation measures as appropriate. **This shall comprise the retention and enhancement of all possible existing habitats, vegetation and breeding sites in the early design stages of the development.**

**CE-24-15** In **Section 24.1 Biodiversity**, add a new **Biodiversity policy P-BD74** as follows:

- P-BD-7** **Where buildings are proposed to be restored or demolished/replaced, the applicants/developers shall check for the presence of protected wildlife species and follow the protocols set out in the Heritage Council’s guidelines “Wildlife in Buildings – Linking Our Built and Natural Heritage”**  
(<https://www.heritagecouncil.ie/content/files/Wildlife-in-Buildings-linking-our-built-and-natural-heritage.pdf>)

**CE-33-25** In **Chapter 33** (Development management standards) change the name of **Section 33.2.12 to Site landscaping and retention of biodiversity** and add the following bullet points:

- All landscaping schemes, including green infrastructure and transport infrastructure, should make provision for pollinator-friendly planting and management regimes, consistent with the All-Ireland Pollinator Plan 2021-2025 and updated versions.
- Modifications to buildings, restoration works (e.g. repointing of stone) and vegetation management (e.g. ivy removal) can impact on protected species, in particular bats and birds. Specialist surveyors should be contracted at the earliest stage so that surveys are undertaken during the correct period, to inform timing of works.
- Access to breeding and roosting sites should be retained where possible. Additional opportunities for wildlife (crevices/entrances, woodcrete bat boxes, swift bricks) should be incorporated within buildings.
- Follow the protocols set out in the Heritage Council's guidelines "Wildlife in Buildings – Linking Our Built and Natural Heritage" (<https://www.heritagecouncil.ie/content/files/Wildlife-in-Buildings-linking-our-built-and-natural-heritage.pdf>)

## Issue 4 – Ecological Impact Assessment

The submission notes that there is an opportunity to require developments to include an element of deliberate biodiversity creation. An Ecological Impact Assessment (EclA) can help to inform the restoration or creation of habitats.

The Department recommends that an EclA is carried out for any proposed development likely to significantly impact on natural habitats or species, notwithstanding other statutory requirements.

### Response

In **Section 24.1.3 Nature conservation outside of designated sites**, policy N-CODS-4 indicates that an EclA may be required, without specifying under what circumstances. This policy should be clarified based on the Department's observation.

### Recommendation

**CE-24-16** In **Section 24.1.3 Nature conservation outside of designated sites**, amend the wording of policy P-NCODS-4 as follows:

- P-NCODS-4** Applications for development **that is likely to have significant impact on natural habitats or species may be required to shall** be accompanied by an Ecological Impact Assessment (EclA), to ensure that such proposed development will not affect the integrity and conservation value of important biodiversity sites.

## Issue 5 – “Greening” of car parks

For car parks, the Department recommends “dense planting of native trees, native hedges and native shrubs” and the use of porous car park surfaces, such as loose local substrate or grasscrete (a permeable paving system). Artificial lighting in car parks should follow Dark Sky Guidelines<sup>4</sup> to reduce light pollution and enhance user experience.

### Response

Noted and agreed.

### Recommendation

**CE-33-29** In **Section 33.3.11 Parking standards for housing developments** (Chapter 33 Development management standards), insert additional provisions as follows:

Landscaping of car parking areas should incorporate native trees, hedgerows and shrubs, to reduce the impact on local wildlife. Car park surfaces should be porous or permeable. Artificial lighting should be designed to minimise light pollution on adjacent habitats, in particular hedgerows, river corridors and tree lines.

## Issue 6 – “Cut and fill”

County Sligo is an important host to a range of species of high conservation value, which often occur in wetlands. The submission notes that important and biodiverse wetland habitats are often destroyed by the unregulated infill of excavated material.

The Department recommends that all developments are required to use ‘Cut and Fill’, where excavated material is re-used elsewhere *within* the same site. The removed soil can be used for embankments, elevated sections etc., and can provide additional wildlife habitat.

### Response

The observations are noted and agreed. Additional provisions should be included in **Section 33.2.12** (Site landscaping and retention of biodiversity).

### Recommendation

**CE-33-26** In **Chapter 33, Section 33.2.12** (Site landscaping and retention of biodiversity), insert **two additional bullet points** as follows:

- Where possible, developments should use “cut and fill”, whereby excavated material is reused within the same site. The removed topsoil and earth can be used for embankments, elevated sections etc., and can provide additional wildlife habitat.
- When preparing a planning application, developers should consult the Map of Irish Wetlands (<https://www.wetlandsurveysireland.com/wetlands/map-of-irish-wetlands--map/>), which identifies the location and characteristics of many wetland habitats in the county.

## Issue 7 – The impact of greenways on biodiversity

The submission notes that tourism, transport and recreational active infrastructure can have a significant adverse impact on biodiversity through loss or fragmentation of habitat, lighting and disturbance to species within areas of high ecological interest.

It is specified that Greenways should not be sited in areas of existing high nature value, because they can pose threats to biodiversity through removal of vegetation during trail development, damage during trail maintenance, inappropriate (e.g. herbicide application) or lack of management, inappropriate landscaping or unsuitable artificial lighting, introducing light into natural dark areas.

The Department recommends that such proposals are subject to rigorous route/site selection processes, similar to a road proposal, to ensure that impacts to biodiversity and nature conservation interests are avoided. An additional policy is recommended in this regard:

*Ensure that the location and design of proposed active infrastructure (e.g. greenways, walking and cycling paths/trails) do not have a significant adverse impact on biodiversity (in particular along riverbanks, lakeshores, wetlands and uplands), through careful site selection, EclA and the precautionary principle.*

### Response

The recommendations are noted and agreed. Additional text should be included in Section 27.7.4 Outdoor recreational amenities with regard to the potential impact of greenways on biodiversity, and a new Outdoor recreation facilities policy should be added to the existing ones.

### Recommendations

**CE-27-07** In **Chapter 27 (Community and social infrastructure)**, **Section 27.7.4 Outdoor recreational amenities**, include the following narrative under the heading Greenways, after the second paragraph:

At the same time, greenways should not be routed through areas of high nature value, because they can pose threats to biodiversity through removal of vegetation during trail development, damage during trail maintenance, inappropriate (e.g. herbicide application) or lack of management, inappropriate landscaping or unsuitable artificial lighting, introducing light into natural dark areas.

However, outdoor recreational infrastructure also has the potential to **improve** both ecological objectives through informed design, by protecting features such as hedgerows, grass/wildflower verges, wetlands and bridges, which are integral landscape features of a greenway corridor.

**CE-27-08** In **Section 27.7.4 Outdoor recreational amenities**, insert the following additional policy:

**P-OR-23** Ensure that the routing/location, siting and design of proposed outdoor recreational infrastructure (greenways, walking and cycling paths/trails, parks and other open spaces) does not have a significant adverse impact on biodiversity (in particular along riverbanks, lakeshores, wetlands and uplands), through careful option selection, Ecological Impact Assessment (EclA) and the application of the precautionary principle.

## DHLGH's Archaeology recommendations

The Department notes that Archaeological heritage "is addressed quite comprehensively in the previous Plan" and hopes that the following points will add more detail to the existing policies and objectives.

### **Issue 8 - Overarching policy for the protection of archaeological heritage**

The submission recommends a policy to protect in an appropriate manner all elements of the archaeological heritage and other features of the following categories:

- (a) Sites and monuments included in the Sites and Monuments Record (SMR) as maintained by the National Monuments Service (NMS).
- (b) Monuments and places included in the Record of Monuments and Places (RMP) as established under section 12 of the National Monuments (Amendment) Act 1994.
- (c) Historic monuments and archaeological areas included in the Register of Historic Monuments as established under section 5 of the National Monuments (Amendment) Act 1987.
- (d) National monuments subject to Preservation Orders under the National Monuments Acts 1930 to 2014 and national monuments which are in the ownership or guardianship of the Minister for Housing, Local Government and Heritage or a local authority.
- (e) Archaeological objects within the meaning of the National Monuments Acts.
- (f) Wrecks protected under the National Monuments Acts 1930 to 2014 or otherwise included in the Wreck Viewer maintained by the National Monuments Service.
- (g) Archaeological features not as yet identified but which may be impacted on by development.

### **Response**

The Council will comply with all relevant legislation, as is mandatory. The Archaeological heritage protection P-AH-1 in Section 25.1 Archaeological heritage (Chapter 25 Built heritage) clearly indicates the Council's commitment to protecting, managing and enhancing the County's archaeological heritage.

**No change to the Draft Plan is required.**

### **Issue 9 – securing the protection of archaeological heritage**

The Department recommends that "In securing such protection, both generally and in the context of any particular planning decision, the Council shall take full account of, and be guided by, national policy on the protection of the archaeological heritage as set out in the Framework and Principles for the Protection of the Archaeological Heritage (Government of Ireland 1999). Any specific recommendations made by the Government Minister responsible for the protection of the archaeological heritage, as a statutory consultee in the planning process, shall be given full consideration by the planning authority."

### **Response**

Noted. The Council will comply with all relevant statutory requirements.

**No change to the Draft Plan is required.**

## **Issue 10 – preservation of archaeological heritage**

The Council shall protect the archaeological heritage through ensuring preservation in-situ or preservation by record, as appropriate, with preservation in-situ being the first option to be considered being presumed to be the preferred option. If preservation in-situ cannot be achieved, or can only be achieved in-part, then preservation by record of the archaeological heritage will be required—this will require the full archaeological excavation and recording of the monument/site, according to best professional practice. Where excavation is required this shall also include the preparation of appropriate reports, post-excavation analyses and publications. The costs of assessing and mitigating archaeological impacts will be considered to be part of development costs which are appropriate to be borne by the developer.

### **Response**

Noted. The Archaeological heritage policies P-AH-2 to P-AH-5 already cover the above requirements.

**No change to the Draft Plan is required.**

## **Issue 11 – Archaeological heritage and development management practice**

The submission indicates that “Archaeological policies encompassing the forgoing are:

- To ensure that archaeological assessment is carried out in accordance with relevant policies and standards, in particular those set out in the Framework and Principles for the Protection of the Archaeological Heritage (Government of Ireland 1999) and the Policy and Guidelines on Archaeological Excavation (Government of Ireland 1999) and the advice in particular cases of the Department of Housing, Local Government and Heritage, with all relevant techniques (including documentary research, aerial photographic research, geophysical survey and archaeological test excavation) being required as appropriate. This will also include, in appropriate cases, the carrying out of building surveys and assessments of upstanding structures to determine the extent to which they are, or contain within them, structures of medieval or early modern date.
- To ensure that all planning applications for developments of categories set out above are referred to the Department of Housing, Local Government and Heritage, through its Development Applications Unit, that such referrals take place in due time and that full account is taken of the recommendations made by the Department.
- To ensure that all such assessments are carried out by professionally qualified and experienced personnel.
- That permission for proposed development will be refused where the development cannot be carried out in a manner compatible with the protection of the archaeological heritage as provided for in the policies and objectives contained in the development plan and in relevant national policies, in particular the Framework and Principles for the Protection of the Archaeological Heritage (Government of Ireland 1999).
- That where permission is granted for proposed development such grants of permission will contain appropriate conditions to secure the protection of the archaeological heritage, either by preservation in-situ or, where impact cannot be avoided, by way of preservation by record.

In imposing such conditions, the planning authority will act in accordance with relevant policies and standards, in particular the Framework and Principles for the Protection of the Archaeological Heritage (Government of Ireland 1999) and the Policy and Guidelines on Archaeological Excavation (Government of Ireland 1999), and be guided in particular cases by the advice of the Department of Housing, Local Government and Heritage.

Such conditions may require, as appropriate, archaeological assessment, preservation in-situ, preservation by record and/or archaeological monitoring as well as post-excavation conservation, analysis and reporting.

- That where preservation in-situ is required as a condition, further conditions may require appropriate immediate and long term conservation and management of the archaeological features in question and long term monitoring of the effectiveness of conservation measures, with appropriate steps required to be taken in the event conservation measures are proving in-effective.
- That where preservation by record is required as a condition, such conditions will further require preparation of appropriate follow-up reports, analyses and publications and the conservation as necessary of archaeological material and objects recovered during the archaeological excavations as carried out.
- That where permission is granted conditions may require presentation to the public of archaeological features preserved in-situ on the site, where practicable, and/or provision of interpretive material at the site (including on a permanent basis) whether or not any features have been preserved in-situ.
- That where archaeological excavation is required as a condition of permission, further conditions may be imposed requiring the provision of public access to such excavations, subject to appropriate safeguards.
- That where conditions are imposed for the protection or preservation of the archaeological heritage, these will make clear that the costs of implementing these are to be borne by the developer.

## Response

The requirements listed above represent elements of current development management practice, already covered by legislation or guided by existing Plan policies. No further policies are necessary.

**No change to the Draft Plan is required in respect of the above.**

## Issue 12 – preservation of historic settlement features

The Department recommends inclusion of the following policies relating to historic settlement features:

- To retain the existing street layout, historic building lines and traditional plot widths where these derive from medieval or earlier origins with towns/villages.
- To ensure that provision is made the planning process that allows for the preservation in-situ of significant medieval masonry remains found during the course of a development and (where practicable) the presentation of such remains should be as part of completed developments.
- To secure the preservation in-situ of surviving above-ground urban medieval and 16th/17th century structures, by ensuring that permission for a development does not result in the loss of the remains of such structures which may survive within buildings which are, or appear to be, of later date.

- Consideration will be made to exclude basement developments in archaeologically sensitive areas, particularly in urban Zones of Archaeological Potential and where there are buried waterlogged deposits.

## Response

The recommendations are noted and agreed. Section 25.3 Architectural heritage (Chapter 25 Built heritage) would benefit from the inclusion of a set of Historic settlement policies, in addition to the existing Vernacular heritage policies. **Policy P-VH-7 should be relocated to the new set of policies**, as it relates to historic plot sizes and street patterns, not only to vernacular heritage.

## Recommendation

**CE-25-01** In Section **25.3 Architectural heritage** (Chapter 25 Built heritage), add the following set of policies, including the (relocated and reformulated) P-VH-7:

### Historic settlements policies

- P-HS-1** Seek the retention of surviving street layout, historic building lines, traditional plot sizes/widths in the villages and towns of Sligo where these derive from medieval or earlier origins, and incorporate ancient boundaries or layouts, such as burgage plots and townland boundaries, into any re-developments.
- P-HS-2** Require the preservation in-situ of significant medieval masonry remains found during the course of development works and, where practicable, support the presentation of such remains as part of the completed development.
- P-HS-3** Secure the preservation in-situ of surviving above-ground urban medieval and 16th/17th century structures, by ensuring that any permitted development does not result in the loss of such remains which may survive within buildings which are, or appear to be, of later date.
- P-HS-4** Consider excluding basement developments in archaeologically sensitive areas, particularly in urban Zones of Archaeological Potential and where there are buried waterlogged deposits.

## Issue 13 – community heritage initiatives

The Department recommends that the Council should support community initiatives and projects regarding preservation, presentation and access to archaeological heritage and underwater cultural heritage, provided such are compatible with appropriate conservation policies and standards, having regard to the guidance and advice of the Department of Housing, Local Government and Heritage.

## Response

The suggestion is noted. Such support is ongoing through the County Heritage Plan.

**No change to the Draft Plan is required.**

## **Issue 14 – Sligo Town draft zoning affecting Recorded Monuments**

The National Monuments Service (NMS) of the Department strongly recommends the removal of the proposed zoning in the area of Recorded Monument SL014-218--- Earthwork (S) and Monuments numbers SL014-296--- Burnt Mound and SL014-297---Burnt Mound from business, industry enterprise to Open Space and recreational amenities.

### **Response**

It is considered that the archaeological policies and objectives contained in Chapter 25 of the Draft Plan, together with the development management standards set out in Chapter 33, afford full protection to Recorded Monuments and any other archaeological features.

## **Issue 15 – Enniscrone draft zoning affecting Recorded Monuments**

The National Monuments Service (NMS) of the Department recommends the removal of the proposed zoning in the area of Recorded Monument SL016-01701- Ringfort and SL016-01702- Souterrain from Strategic Land Reserve to Open Space and recreational amenities.

### **Response**

It is considered that the archaeological policies and objectives contained in Chapter 25 of the Draft Plan, together with the development management standards set out in Chapter 33, afford full protection to Recorded Monuments and any other archaeological features.

## Section 7.

### Submissions received from Prescribed Bodies

Section 13 of the Planning and Development Regulations 2001-2023 lists the prescribed bodies for the purposes of sections 11, 12 and 13 of the Act – which relate to the preparation of a development plan. The Planning Authority is obliged to notify these bodies at specified times in the process.

As part of the public consultation on the Draft Sligo County Development Plan 2024-2030, the Planning Authority has invited all prescribed bodies to examine the draft documents and make submissions and observations.

Twenty-nine (29) prescribed bodies were notified on 12 October 2023, including the Office of the Planning Regulator, the Northern and Western Regional Assembly and the Department of Housing, Local Government and Heritage. The submissions received from the OPR, NWRA and DHLGH were addressed in Section 4, 5 and 6 of this Report.

Of the remaining twenty-six Prescribed Bodies, only thirteen responded with submissions – these are highlighted in the table below.

An Bord Pleanála	<b>Health and Safety Authority – Submission 1</b>	<b>Minister for Environment, Climate and Communications – Submission 150</b>
An Taisce	Heritage Council	<b>Minister for Education – Submission 76</b>
<b>Arts Council – Submission 113</b>	<b>HSE National Environmental Health Service – Submission 209</b>	Minister for Defence
Dublin Airport Authority	Inland Fisheries Ireland	Eastern and Midlands Regional Assembly
EirGrid	<b>Uisce Éireann – Submission 119</b>	Southern Regional Assembly
<b>Environmental Protection Agency – Submission 19</b>	Leitrim County Council	<b>Office of Public Works – Submission 73</b>
<b>ESB – Submission 109</b>	Roscommon County Council	<b>Transport Infrastructure Ireland – Submission 47</b>
<b>Fáilte Ireland – Submission 194</b>	Mayo County Council	<b>Minister for Transport – Submission 9</b>
Minister for Agriculture, Food and the Marine	Minister for Enterprise, Trade and Employment	

# Submission 1

## Health and Safety Authority (HSA)

<https://consult.sligococo.ie/en/submission/slg-c29-1>

### Summary of issues

The HSE, as a prescribed body, recommends its document 'Guidance on technical land-use planning advice' and expects the Sligo CDP to contain:

- an indication of planning policy in relation to major accident hazard sites;
- the consultation distances and generic advice, where applicable, supplied by the Authority to Sligo County Council in relation to such sites;
- a policy on the siting of new major hazard establishments;
- mention of Lough Gill Distillery Ltd, a “notified establishment”.

### Response

The planning policy in relation to major accident hazard sites is set out in Chapter 28 Economic Development, Section 28.1.4 Seveso sites. The Draft Plan does not designate sites or zones for uses that might be classified as Seveso establishments.

Section 28.1.4 clearly states that any such development proposals that may occur during the Plan's life will be referred to the Health and Safety Authority for technical advice.

At the time of preparing the Draft plan, no entity called “Lough Gill Distillery” was on the list of Notified Seveso Establishments on the HSA website.

It is noted that the most recent update of the above-mentioned list (dated 1.02.2024) includes two entries with addresses in County Sligo:

- No. 38 “Lough Gill Distillery” with an address at “Hazelwood, Co. Sligo”;
- No. 43 “Sazerac of Ireland ULC t/a Lough Gill Distillery” with an address at “Hazelwood, Carns, Co. Sligo”.

Given the lack of clarity, and the obviously changing nature of the HSA-published lists, it is not considered necessary to mention any Notified Seveso Establishments in the Development Plan.

**No change to the Draft Plan is required.**

## Submission 9

### Department of Transport

<https://consult.sligococo.ie/en/submission/slg-c29-9>

#### Issue

The submission requests the inclusion of the term “inter-urban” in Chapter 9 Transport Strategy (Vol. 1 of the Draft Plan), p. 74.

#### Response

No objection to the suggested minor modification.

#### Recommendation

**CE-09-07** In **Chapter 9 Transport Strategy**, modify the paragraph on p. 74 under the heading **National Cycle Network** as follows:

In summer 2022, TII published for consultation a proposal to create a National Cycle Network (NCN) aiming to link towns, cities and destinations across Ireland with an **inter-urban** safe, connected and inviting cycle network. The NCN has been designed to integrate with and complement other cycle infrastructure and networks – both existing and planned.

## Submission 19

# Environmental Protection Agency

<https://consult.sligococo.ie/en/submission/slg-c29-19>

The EPA is a statutory environmental authority under the SEA Regulations, which focuses on promoting the integration of the findings of the Environmental Assessment into the Plan and advocating that the key environmental challenges for Ireland are addressed as appropriate to the plan.

The submission refers to the guidance document '*SEA of Local Authority Land Use Plans – EPA Recommendations and Resources*' and makes a series of broad recommendations, summarized below.

### Issue 1 – Content of the Environmental Report

The submissions indicates that the Environmental Report should contain an **assessment of alternatives**, an **assessment of environmental effects** and appropriate **mitigation measures** where a potential for likely significant effects has been identified. In addition, the Plan should include clear commitments to implement the mitigation measures.

#### Response

Both the Draft Plan and the associated SEA Environmental Report describe the alternative development options considered at pre-draft stage. The Environmental Report contains all the required details, including the assessment of alternatives, assessment of the Draft Plan's environmental effects and the mitigation measures that have been transposed into policies of the Draft Plan.

**No change to the Draft Plan or Environmental Report is required on foot of the above EPA recommendations.**

### Issue 2 – Monitoring

The Monitoring Programme should be flexible to take account of specific environmental issues and unforeseen adverse impacts should they arise. It should consider and deal with the possibility of cumulative effects. Monitoring of both positive and negative effects should be considered. The monitoring programme should set out the various data sources, monitoring frequencies and responsibilities.

If the monitoring identifies adverse impacts during the implementation of the Plan, Sligo County Council ensure that suitable and effective remedial action is taken.

Guidance on SEA-related monitoring is available on the EPA website at

<https://www.epa.ie/publications/research/environmental-technologies/research-306-guidance.php>

#### Response

Section 10 of the SEA Environmental Report indicates that "The Council shall, in conjunction with the Regional Assembly and other sources as relevant, implement the monitoring programme as set out on Table 10.1. This will include the preparation of stand-alone SEA Monitoring Reports". Table 10.1 in the same section sets out indicators, targets and sources of information to be used in monitoring SEOs, as well as remedial actions where necessary.

**No change to the Draft Plan or Environmental Report is required.**

### **Issue 3 – State of the Environment Report**

In finalising the Plan and integrating the findings of the SEA into the Plan, the recommendations, key issues and challenges described in our *State of the Environment Report [Ireland's Environment – An Integrated Assessment 2020](#)* (EPA, 2020) should be considered, as relevant and appropriate. This should also be taken into account in preparing the Plan and SEA.

#### **Response**

Noted. This document will be taken into account in integrating the findings of the SEA in the final Plan.

**No change to the Draft Plan is required on foot of the above EPA recommendation.**

### **Issue 4 – Future amendments to the Plan**

Any amendments to the Plan must be screened for likely significant effects, using the same method of assessment applied in the environmental assessment of the Draft Plan.

#### **Response**

Noted. This is a legal requirement.

**No specific change to the Draft Plan is required on foot of the above EPA recommendation.**

### **Issue 5 - SEA Statement (information on the decision)**

The submission indicates that an SEA Statement must be prepared upon adoption of the Plan. The Statement should summarise the process of integrating environmental considerations into the Plan (including outcome of consultations), the reasons for deciding on the preferred alternative, the monitoring measures.

The Statement must be communicated to the prescribed environmental authorities: EPA, Minister for Housing, Local Government and Heritage (DHLGH), Minister for Environment, Climate and Communications (DECC), Minister for Agriculture, Food and the Marine (DAFM), planning authorities of adjoining counties (Leitrim, Mayo, Roscommon).

#### **Response**

Noted. All the above are legal requirements.

**No change to the Draft Plan is required on foot of the above EPA recommendations.**

## Submission 47

# Transport Infrastructure Ireland (TII)

<https://consult.sligococo.ie/en/submission/slg-c29-47>

The submission notes that Sligo County Council, in collaboration with TII, has overseen and continues to oversee significant investment in improving the strategic national road network in the County.

TII's observations address the safety, capacity and strategic function of the national road network in accordance with TII's statutory functions and the provisions of national policy.

### Issue 1 – Strategic road network

The Trans-European Transport Networks (TEN-T) Regulations target a gradual development of the transport network, with the **core network** a priority (by 2030) followed by the remainder of the **comprehensive network** (by 2050). The TEN-T Regulations seek to ensure high safety standards for road users and freight transport.

The national primary roads N4, N15, N16 and N17 are part of the EU TEN-T Comprehensive Network. In combination with the national secondary road N59, the primary roads provide important regional, inter-regional connectivity and international connectivity.

TII would welcome the inclusion of new text in Volume 1 Core Strategy Chapter 9 '*Transport Strategy*' of the Draft Plan. The submission suggests the inclusion of an additional strategic policy in Chapter 9 (Transport Strategy, reflecting official policy requirements, summarised as follows:

- to maintain the strategic function, capacity and safety of the national roads network, and
- to ensure that the existing extensive transport networks, which have been greatly enhanced over the last two decades, are maintained to a high level to ensure quality levels of service, safety, accessibility and connectivity to transport users, including the critical lifeline route function of the N56, national secondary road.

### Response

**Chapter 9 Transport Strategy** already includes appropriate reference to the TEN-T network in the introduction and the footnote on p. 71 of Volume 1 (Core Strategy). Further details are not considered necessary.

It is agreed, however, to include an additional strategic transport policy in respect of the national roads network.

### Recommendation

**CE-09-06** In **Chapter 9 Transport Strategy** (Volume 1, Core Strategy), include an additional strategic transport policy as follows:

- SP-TRA-6** Maintain the strategic function, capacity and safety of the national roads network, to ensure high-quality levels of service, safety, accessibility and connectivity to transport users of the national primary roads N-4, N-15, N-16, N-17 and the national secondary road N-59, which has a critical lifeline route function within the network.

## Issue 2 – Draft Local Transport Plan

TII welcomes the Draft Local Transport Plan that accompanies the Draft Plan and offers the following recommendations:

- a. Table 2-1 in Section 2.1 should be updated to reference the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012) having regard to the extensive national road network in the Plan area. Also, the table should reference TII Publications (Standards) as the relevant design standard for works to national roads, complementary to the Design Manual for Urban Roads and Streets in urban locations.
- b. Figure 6-3 and Figure 6-6, which indicate locations of junction improvements on the national road network, should be accompanied by references to DMURS and the complementary TII Publication 'The Treatment of Transition Zones to Towns and Villages on National Roads' (DN-GEO-03084).
- c. Section 3.4.4 'Existing Road Network' of the Local Transport Plan should be updated to acknowledge the N59, national road, in the LTP area.
- d. The principles and objectives of the Draft LTP, outlined in Section 5.1, should acknowledge the need to safeguard the strategic function of the national road network, including national road junctions, through the LTP area, in accordance with Government policy.

### Response

The observations are noted and agreed.

### Recommendations

The **draft LTP** should be amended as follows:

- CE-LTP-01** Modify **Table 2-1 in Section 2-1** to include reference to the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' and to the TII Publications (Standards) as the relevant design standard for works to national roads, complementary to the Design Manual for Urban Roads and Streets in urban locations.
- CE-LTP-02** Modify the **text relating to Figures 6-3 and 6-6** (which indicate locations of junction improvements on the national road network) to include references to DMURS and the complementary TII Publication 'The Treatment of Transition Zones to Towns and Villages on National Roads' (DN-GEO-03084).
- CE-LTP-03** Modify the **text in Section 3.4.4. Existing Road Network** to include the national secondary road N-59, which is part of the national road network in the LTP area.
- CE-LTP-04** In **Section 5.1 Principles and Objectives**, modify the second principle as follows:  
Support the Regional Spatial and Economic Strategy by providing a permeable Sligo Town Centre for walking, cycling and the mobility impaired, **while safeguarding the strategic function of the national road network, including national road junctions within the LTP area.**

### Issue 3 – Access to national roads

With regard to Section 29.2 (National primary and secondary roads) of the Draft Plan, TII welcomes the inclusion of Policy P-NR-1 which seeks to protect the capacity and efficiency of the national road network by avoiding the creation of new access points or the generation of increased traffic from existing accesses to national roads.

Section 33.9.1 of the Draft Plan sets out standards related to access to national roads and reiterates the above policy position, whilst also outlining the approach to be applied for access to national roads where reduced 50–60 km/h urban speed limits apply.

TII considers that the approach included in Policy P-NR-1 and Section 33.9.1 is consistent with Government policy included in the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012) and welcomes and supports the approach included in the Draft Plan in that regard.

TII would welcome a cross reference included in Section 5.5 and Section 26.4 of the Draft Plan referring to Policy P-NR-1 and the policy to avoid the creation of any new direct access points from development or the generation of increased traffic from existing direct access/egress points to the national road network, to which speed limits greater than 60 km/h apply.

#### Response

TII's positive opinion and suggestions are noted. It is not considered necessary to cross-reference P-NR-1 from Chapter 29 (Transport infrastructure) in Chapter 5 (Settlement Strategy), but a reference should be included in Section 26.4 (Housing in rural areas).

The Chief Executive has already recommended modifications to Section 26.4, in response to the similar OPR request – see Submission 184/Observation 4/Issue 14.B and corresponding [CE-26-09](#).

**No further change to the Draft Plan is required in respect of the above.**

### Issue 4 – Rural enterprise and national roads

TII acknowledges the role of rural economy in and its potential to support local employment. At the same time, proposals for economic development in rural locations should be explicitly required to adhere to the provisions of official policy on access to national roads.

TII suggests a new objective for inclusion in Volume 1 / Chapter 7 and Volume 3 / Chapter 28:

*'Proposals for economic development, including those related to strategic economic locations in the Development Plan and rural enterprise proposals will be progressed complementary to safeguarding the strategic function, safety and investment in the strategic national road network to date and in compliance with the provisions of the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012).'*

In addition, TII would welcome a cross-reference to Policy P-NR-1 included in Volume 3, Chapter 28, and the requirement to avoid the creation of any new direct access points from development or the generation of increased traffic from existing direct access/egress points to the national road network, to which speed limits greater than 60 km/h apply.

In this regard, TII would, in particular, identify Policy P-BIE-4 and those activities included in Section 28.2 of the Draft Plan 'Economic Activities in Rural Areas' as well as 'Tourism Development' in Section 28.3 where proposals may be promoted in rural locations.

## Response

TII's observations and suggestions are noted. It is considered unnecessary to cross-reference P-NR-1 from Chapter 29 (Transport infrastructure) in Chapter 7 (Economic Development Strategy). However, it is agreed to modify the **relevant objectives** in Chapter 28 Economic development.

## Recommendations

**CE-28-01** In **Section 28.1 Industry and enterprise locations** (Chapter 28 Economic development), add the following bullet point to the **Business, industry and enterprise policy P-BIE-4**:

- D.** the proposal does not conflict with the requirement to safeguard the strategic function, safety and investment in the strategic national road network to date, and is in compliance with the provisions of the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012).

**CE-28-02** In **Section 28.2 Economic activities in rural areas**, add the following paragraph to the **Rural enterprise diversification policy P-RED-1**:

The proposal shall also demonstrate that it does not conflict with the requirement to safeguard the strategic function, safety and investment in the strategic national road network to date, and is in compliance with the provisions of the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012).

**CE-28-08** In **Section 28.3 Tourism development**, add the following paragraph to the **Tourism development policy P-TOU-1**:

Development proposals shall also demonstrate that they do not conflict with the requirement to safeguard the strategic function, safety and investment in the strategic national road network to date, and are in compliance with the provisions of the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012).

## Issue 5 – Retail centres

TII acknowledges the fact that out-of-town shopping facilities are discouraged in Policy SP-RP-6.

TII would welcome a cross reference in Volume 1 Chapter 8 referring to Policy P-NR-1 and a new policy or objective to reference the explicit presumption against large out of town retail centres located adjacent or close to existing, new or planned national roads/motorways.

## Response

It is considered unnecessary to cross-reference P-NR-1 from Chapter 29 (Transport infrastructure) in Chapter 8 (Retail Strategy). As no large out-of-town retail centres would be permitted under the Retail Strategy, no additional restrictive policy is needed.

**No change to the Draft Plan is required on foot of the above observations.**

## Issue 6 – N17 Knock to Collooney Scheme

TII welcomes Policy P-NR-2, which seeks to protect the route corridors necessary for the construction of new roads or the upgrading of existing national roads in Sligo. It is noted that Objective O- NR-1 includes the commitment to improve the national road network including the projects outlined in Table 29.2 which provides for the N17 *Knock to Collooney* Scheme.

The submission clarifies that the implementation of all national road schemes is subject to prioritisation and adequacy of the funding resource available to the TII. The relative priority or timeframe for national road schemes may be subject to alteration.

The TII's priorities in relation to national roads in County Sligo comprise the N17 Knock to Collooney Scheme, the maintenance of the existing national road network, including junctions, and the safeguarding the Exchequer investment in national roads to date.

Any other improvements relating to national roads identified at a local level should be done in consultation with and subject to the agreement of TII, which may not be responsible for the funding of any such schemes or improvements.

### Response

The comments relating to prioritisation and availability of funding for national roads improvements are noted. It is agreed to include clarifications on the projects listed in Table 29.2.

### Recommendation

**CE-29-02** In **Section 29.2 National primary and secondary roads** (Chapter 29 Transport Infrastructure), add **a second note** under **Table 29.2 National road projects in County Sligo**, as follows:

Improvements relating to national roads identified at a local level should be carried out in consultation with and subject to the agreement of TII, which may not be responsible for the funding of any such schemes or improvements. In all instances, national road improvement schemes should be developed complementary to safeguarding the strategic function of the national road network.

## Issue 7 – TII design standards

TII acknowledges that Section 9.3 of the Draft Plan considers transport and mobility and addresses sustainable and active travel and the Sligo Local Transport Plan.

The submission recognises the fact that “design principles applied to urban streets and roads reflect the recommendations in the Design Manual for Urban Roads and Streets (DMURS) in relation to 50/60 kph urban speed limit zones”, but recommends including a reference to TII Publications Standard DN-GEO-03084 ‘The Treatment of Transition Zones to Towns and Villages on National Roads’.

### Response

The suggestion is noted, but it is not considered necessary to include references to detailed road design standards in the Development Plan or the LTP.

**No change to the Draft Plan is required on foot of the above.**

## Issue 8 – Service areas

The submission acknowledges that “Development Standards related to Petrol Filling Stations are included in Section 33.7 of the Draft Plan”, and refers the Planning Authority to “Section 2.8 of the DoECLG Spatial Planning and National Roads Guidelines, which “indicate the requirement for a forward planning approach to the provision of off-line motorway service areas at national road junctions and addresses roadside service facilities on non-motorway national roads and their junctions”.

TII would welcome consideration by the Council of a reference to “the policy position reflected in Section 2.8 of the DoECLG Spatial Planning and National Roads Guidelines relating to the control on the provision of roadside service facilities on non-motorway national roads and their junctions in the Draft Plan”.

### Response

Section 2.8 of the Guidelines indicates that a proliferation of service area facilities along rural sections of national roads is undesirable, and the preferred location is in the proximity of towns and villages. This is appropriately stated in Section 33.7.1 Petrol filling stations and ancillary uses, and does not need to be repeated.

**No change to the Draft Plan is required on foot of the above.**

## Issue 9 - National road drainage

TII has experienced a number of instances nationally where private development proposals have accessed or sought to access national road drainage regimes to dispose of surface water drainage.

National road surface water drainage regimes are constructed with the objective of disposing of national road surface water, and it is important that capacity in the drainage regime is retained to address this function.

The submission suggests the inclusion of a new objective outlining that:

*‘The capacity and efficiency of the national road network drainage regimes in County Sligo will be safeguarded for national road drainage purposes’.*

### Response

The suggestion is noted and agreed.

### Recommendation

**CE-29-03** In **Chapter 29 Transport infrastructure**, include an additional **National roads policy** as follows:

**P-NR-4** Safeguard the capacity and efficiency of the national road network drainage regimes in County Sligo and ensure that private developments do not discharge surface water to national road drainage.

## Issue 10 – Solar farms

TII recommends that Solar Farm Renewable Energy Development proposals in the vicinity of the strategic national road network should be accompanied by glint and glare assessments.

### Response

The recommendation is noted and agreed. A relevant statement shall be included in Chapter 33 Development management standards.

### Recommendation

**CE-33-23** In **Section 33.11.2 Solar energy** (Chapter 33 Development management standards), include an **additional requirement after the third paragraph**, as follows:

At present, there are no national planning guidelines for solar energy development. The Council will assess individual applications having regard to normal planning considerations and the location criteria applicable to other types of renewable energy developments – see Section 33.11.1 above.

Where the solar farm developments are proposed in locations where they can be seen from the road network, applications must be accompanied by glint and glare assessments.

## Issue 11 - Grid connection routing for renewable energy developments

For all renewable energy developments requiring a grid connection to the national grid, TII recommends that a full assessment of all route alternatives to grid connection takes place, including alternatives to public road, where appropriate. It is not considered optimal to utilise the national road as a grid connection route when viable alternatives are available.

In TII's experience, grid connections accommodated on national roads have the potential, inter alia, to result in technical road safety issues and can impact on the ability and cost of general maintenance, upgrades and safety works.

The submission suggests to including a provision indicating that grid connection cable routing should seek to utilise alternatives, where available, as opposed to being placed along the strategic national road network.

### Response

The recommendation is noted and agreed. A relevant statement shall be included in Chapter 33 Development management standards.

### Recommendation

**CE-33-24** In the introductory part of **Section 33.11 Energy and telecommunications infrastructure** development standards, include the following provision after the four bullet points:

All renewable energy developments requiring connection to the national grid shall be accompanied by an assessment of all route alternatives, including alternatives to public roads. It is not considered appropriate to utilise a national road as a grid connection route when viable alternatives are available.

## Issue 12 – NRA Design Manual for Roads and Bridges

The submission indicates that the NRA Design Manual for Roads and Bridges has been superseded and all relevant design standards for national roads are now included in TII Publications. All references included in the Draft Plan related to the NRA DMRB should be updated to TII Publications.

### Response

The suggested replacement of “NRA DMRB” with the general term “TII publications” is noted, but considered unnecessary, as it does not increase clarity. The submission does not indicate the name (or code) of the document (or set of documents) that has replaced the NRA DMRB. The Manual continues to be available on the TII website under the original name.

**No change to the Draft Plan is required on foot of the above.**

## Issue 13 - Noise

The submission noted that ‘Air and Noise’ is addressed in Section 33.2.9 of the Draft Plan. Government policy requires that development proposals identify and implement noise mitigation measures, where warranted, for noise sensitive development proposed in the vicinity of existing or proposed national roads. TII would welcome consideration by the Council of including the following requirement in Section 33.2.9 in the Draft Plan:

*‘Development proposals should identify and implement noise mitigation measures, where warranted, for development proposed in the vicinity of existing or proposed national roads. The costs of implementing mitigation measures shall be borne by the developer, as the Authority will not be responsible for the provision of additional noise mitigation.’*

### Response

The suggestion is noted and agreed.

### Recommendation

**CE-33-04** In Section **33.2.9 Air and noise** (Chapter 33 Development management standards), include the following provision after the second paragraph:

Applications for noise-sensitive development located in the vicinity of existing or proposed national roads proposals should identify appropriate noise mitigation measures. The costs of implementing mitigation measures shall be borne by the developer. The Local Authority will not be responsible for the provision of additional noise mitigation.

## Issue 14 – Signage

Section 3.8 of the DoECLG Spatial Planning and National Roads Guidelines indicates a requirement to control the proliferation of non-road traffic signage on and adjacent to national roads.

While TII welcomes reference to the TII Policy on the Provision of Tourist & Leisure Signage on National Roads (March 2011) in Section 33.8 of the Draft Plan, there appears to be no reference to Section 3.8 of the above-mentioned Guidelines.

TII would welcome the signage-related provisions of the DoECLG Guidelines incorporated into the new Development Plan.

### Response

The suggestion is noted and agreed. A relevant reference to the Guidelines should be inserted in Section 33.8.2 of the Draft Plan.

### Recommendation

**CE-33-16** In **Section 33.8.2 Advertising signage along public roads** (Chapter 33 Development management standards), insert additional wording in the first paragraph, as follows:

The placing of advertising signage along public roads detracts from the amenity of the rural setting and interferes with views and scenic landscapes. *The Spatial Planning and National Roads Guidelines* (DECLG, 2012) include a requirement to control the proliferation of non-road traffic signage on and adjacent to national roads, for safety reasons. Excessive signage, especially outside the 50-60 km/h speed limit areas, can reduce the effectiveness of authorised road traffic signs (e.g. directional signs). Signage can also create visual clutter and distractions for road users, and can reduce visibility at junctions and bends.

## Issue 15 - Greenways/Active Travel

In relation to Greenway and Active Travel proposals, consultation with the Council's own internal project and/or design staff is recommended.

### Response

The recommendation is noted. Internal consultation has been carried out as part of the preparation of the Draft Plan, and also with regard to the response to issues raised in submissions received during the public consultation.

**No change to the Draft Plan is required.**

## Issue 16 – Chapter 11 Sligo Town

Noting the Council's intention to prepare a Local Area Plan for Sligo and Environs, TII would welcome participation in consultation on the future LAP, having regard to the extensive strategic national road network within the Sligo urban area.

In the advance of the LAP preparation, TII requests “that the Council review zoning proposals adjoining and in the vicinity of the national road network to ensure an integrated land use and transportation strategy for the town. In particular, TII notes extensive ‘Business, Industry, Enterprise’ (BIE) designated zoned lands to the north-east of the town adjoining the N16, national road, at a location where a 100 km/h speed limit applies”.

## Response

The comments are noted. As a prescribed body, the TII will be notified of the commencement of pre-draft consultation on the future LAP for Sligo Town.

The Sligo Town zoning proposals included in the Draft CDP 2024-2030 do not need to be reviewed, as all the zoned lands are accessible from locations within the 50-60 km/h urban speed limits.

**No change to the Draft Plan is required on foot of the above comments.**

## Issue 17 – Chapter 15 Ballysadare Village Plan

TII notes that Section 15.3.3 of the Village Plan includes a number of improvement proposals for national road junctions. The Council will be aware that it remains the requirement that a Design Report is completed and submitted for works to national roads in accordance with TII Publications DN-GEO-03030 (Design Phase Procedure for Road Safety Improvement Schemes, Urban Renewal Schemes and Local Improvement Schemes).

## Response

The comments are noted. **No change to the Draft Plan is required.**

## Issue 18 – Chapter 16 Collooney Village Plan

TII acknowledges that the extensive ‘Business, Industrial, Enterprise’, ‘Mixed Use’ and ‘Community Facilities’ zoning to the east side of the N4 relate to established uses.

The submission welcomes the proposal included in Section 16.3.3 of the Draft Plan to provide a footpath and cycle link between Toberbride Business Park and the village centre.

TII notes that the N17 national road corridor is shown on the Collooney Draft Zoning Map, but the Draft Village Plan includes no associated Strategic Objective. The text should be updated to reflect the *N17 Knock to Collooney Scheme* and to include an objective to safeguard the scheme pending its delivery.

## Response

The positive comments are noted.

In response to the OPR’s similar observation (Observation 4), the Chief Executive has recommended that **Chapter 16 Collooney Village Plan** should include an objective corresponding to the N-17 route corridor (insert correct road scheme name), which is shown on the Draft Collooney Zoning Map. Refer to **CE-16-04** (OPR Submission 184/Issue 14).

**No further change to the Draft Plan is required.**

## **Issue 19 – Chapter 18 Grange Village Plan**

TII notes Section 18.3.3 of the Draft Plan includes improvement proposals for a national road junction. As noted above, the Council will be aware that it remains the requirement that a Design Report is completed and submitted for works to national roads in accordance with TII Publications DN-GEO-03030 (Design Phase Procedure for Road Safety Improvement Schemes, Urban Renewal Schemes and Local Improvement Schemes).

The submission also notes the 'Business, Industry, Enterprise' (BIE) designated zoned lands to the south of the town adjoining the N15, national road, at a location where an 80 km/h speed limit applies. Access to national roads in such circumstances conflicts with the provisions of Section 2.5 of the DoECLG Spatial Planning and National Roads Guidelines. Therefore, TII recommends review of the subject zoning objective to ensure zoning objectives conform to the requirements of the Guidelines concerning the general restriction on access to national roads.

### **Response**

The positive comments are noted.

The BIE zoning of lands to the south of Grange Village reflects the existing uses on these lands, which already have access to the national road. It is not necessary to review the zoning objective. In the interest of road safety, the applicable speed limit should be reduced.

**No change to the Draft Plan is required on foot of the above.**

## **Issue 20 - Chapter 46 Curry Village Plan and Chapter 48 Drumcliff Village Plan**

Both Village Plans include objectives relating to improvements to national roads and TII wishes to highlight the requirement that a Design Report is completed and submitted for works to national roads in accordance with TII Publications DN-GEO-03030 (Design Phase Procedure for Road Safety Improvement Schemes, Urban Renewal Schemes and Local Improvement Schemes).

### **Response**

The comments are noted. **No change to the Draft Plan is required.**

## Submission 73

### Office of Public Works (OPW)

<https://consult.sligococo.ie/en/submission/slg-c29-73>

The OPW welcomes the following elements of the Draft Plan:

- the acknowledgement of the Guidelines on the Planning System and Flood Risk Management (DECLG/OPW, 2009) and the proposed measures set out in the Flood Risk Management Plans (FRMPs);
- the preparation of a Strategic Flood Risk assessment (SFRA);
- the Flood Risk Management Policies P-FRM-1 to P-FRM-9;
- the Policy P-SWD-2 which requires planning applications to be accompanied by a comprehensive SuDS assessment.

The submission includes several comments intended to “highlight opportunities” and improve the Draft Plan before it is finalised.

In addition, the OPW notes that there are some errors in the transposing of the flood risk datasets into the Flood Zones, such as small omissions of areas and the use of the incorrect probability extents, providing examples and *Specific Comments on Settlements*.

To illustrate the specific comments, the OPW has included screengrabs from the Draft Sligo CDP SFRA in its submission. All screengrabs have been retained in the Chief Executive’s responses below.

## General comments of the OPW

### Issue 1 – Flood zone mapping

The OPW indicates that flood zone maps should show the proposed land use zonings overlaid with both Flood Zone A and B, to demonstrate that the sequential approach has been applied. These maps should be at a reasonable scale and be clearly legible.

#### Response

The request is noted and agreed. Responding to the similar issue raised by the OPR, the Chief Executive has recommended that an additional “Objectives Map” should be prepared for each zoned settlement, and that these maps should show Flood Zones A and B.

Overlay mapping will also be prepared for the final, consolidated Strategic Flood Risk Assessment document, with Flood Zones A and B overlain on final land use zoning.

Refer to recommendations **CE-FZ-01** and **CE-SFRA-01** (Submission 184/Issue 18).

**No further changes to the Draft Plan are required.**

## Issue 2 – Groundwater flooding

Table 3 Predictive Flood Risk Indicators in the SFRA should note the Geological Survey Ireland (GSI) as the data source for the groundwater mapping.

### Response

Noted and agreed.

### Recommendation

**CE-SFRA-02** In the SFRA Report, include a note with Table 3 Predictive Flood Risk Indicators, indicating the Geological Survey Ireland (GSI) as the data source for the groundwater mapping.

## Issue 3 - Additional sources of information

*Minor Works* funding has been received from the OPW for a number of studies in Sligo County. Where there is robust additional information, such as site-specific flood risk assessments, or where local surveys have been undertaken recently, such information should also be included in the making of spatial planning decisions.

### Response

Noted. All available relevant information has been and will continue to be considered in the undertaking of the SFRA and preparation of the Plan.

**No changes to the SFRA or to the Draft Plan are required.**

## Issue 4 - Unmapped watercourses

Planning Authorities may need to carry out their own Flood Risk Assessments to inform the definition of Flood Zones for areas less than 5km<sup>2</sup> that were not included in the National CFRAM and NIFM Programmes.

### Response

Noted. **No changes to the SFRA or to the Draft Plan are required.**

## Issue 5 - National Coastal Flood Hazard Maps (NCFHM)

The submission notes that the maps for settlements with NCFHM extents are difficult to interpret, because the maps include 1%, 0.5% and 0.1% AEP present-day-scenario extents and 0.1% AEP extents for mid-range, high-end, high-end + and high-end ++ future scenarios.

The OPW suggests showing only the present-day scenarios and including the mid-range and high-end scenario mapping with the future scenario mapping for the fluvial datasets.

## **Response**

Noted. The cited datasets, together with other flood risk indicators, have informed the delineation of flood risk zones, which have informed the land use zoning in the Draft Plan. Furthermore, these datasets will be available for use in lower levels of decision making. It is not considered necessary to remap these datasets.

**No changes to the SFRA or to the Draft Plan are required.**

## **Issue 6 - Justification Tests**

Justification Tests have been supplied for “existing developments close to the perimeter in village settlements, which due to their rural nature cannot satisfy all of the five parts of criterion 2 of the Justification Test and therefore fail the Test”. As these sites may never satisfy all criteria, the use of the Justification Test may not be appropriate, and Sligo County Council may consider if these sites might be managed through use of policy objectives and the Limitations related to Flood Risk Zones.

Each of the parts of Criterion 2 should be completed separately for each Justification Test.

## **Response**

The five parts of criterion 2 of the Justification Test have been considered by Sligo County Council and the Justification Tests undertaken as appropriate. Please also refer to responses relating to OPW's specific comments on settlements (below).

**No change to the Draft Plan or SFRA Report is required on foot of this observation.**

## **Issue 7 – Consideration of climate change impacts**

The OPW welcomes the inclusion of the future scenario mapping in the SFRA. It would be useful if the future scenario mapping could be overlaid with the land use zoning maps to see the areas/site at potential risk or further risk from climate change.

The submission notes that it “is not stated in the Draft Plan how climate change has been considered in the production of the Plan”. In line with the Guidelines, while Flood Zones are defined on the basis of current flood risk, planning authorities need to consider such impacts in the preparation of plans, such as by avoiding development in areas potentially prone to flooding in the future, providing space for future flood defences and specifying minimum floor levels.

## **Response**

The future scenario datasets have been mapped and are available as part of the SFRA document. These datasets have been considered in the preparation of the Plan, including its various provisions relating to flood risk management. It is agreed to include an explicit statement in this regard in Chapter 32 (Flood risk and coastal protection) Section 32.1.2 Strategic Flood Risk Assessment.

## Recommendation

**CE-32-02** In **Chapter 32, Section 32.1.2 Strategic Flood Risk Assessment**, modify the third paragraph on p. 130 as follows:

The flood risk management provisions of this Development Plan explicitly integrate climate change considerations **and have been informed by future scenario datasets (mapped in the accompanying SFRA)**. This includes Policy P-FRM-6 outlined below and the associated development management standards set out in Chapter 33, Section 33.2.6 (Flood risk assessment).

## Issue 8 - Flood relief and drainage-related policies

The OPW welcomes Policies P-FRM-7 and P-FRM-8 to support the OPW in the development and implementation of sustainable flood risk management actions, including the delivery of **Flood Relief Schemes**, and to protect the integrity of any formal flood risk management infrastructure, ensuring new development does not impact existing infrastructure or compromise proposed new infrastructure.

The submission welcomes Policy P-FRM-4 to ensure that access is preserved where new developments are proposed near **Arterial Drainage Schemes and Drainage Districts**.

The OPW welcomes Policy P-SWD-2 to require that planning applications are accompanied by a comprehensive **SuDS** assessment, as well as **Surface Water Drainage Policies** P-SWD-3, P-SWD-5 and P-SWD-6.

The submission also welcomes Policy P-FRM-3 to maintain flood protection zones around lakes, rivers, and soft shorelines, and that development proposals will be required to maintain these flood protection zones generally free from development.

The Guidelines provided in Section 3.5 Sustainable Urban Drainage Systems and Surface Water Guidance and Strategy in the SFRA is also welcomed by the OPW.

## Response

The positive comments are noted. **No change to the Draft Plan is required.**

## Specific comments on settlements

### **Issue 9 - Ballinacarrow**

There is an area zoned as *Rural Village* and *Transport and Utilities Infrastructure* which is within Flood Zone B on the Flood Zone map. The watercourse at this location appears to be a watercourse which was not included in either the National CFRAM or NIFM programmes.

The OPW requests confirmation of the dataset that has been used to establish that this area is within the Flood Zones. The Flood Zones are determined on the basis of the probability of river and coastal flooding only.

### **Response**

The observation is noted. Flood Zones associated with this water body, which is of a relatively small catchment, were delineated by the SFRA as per the Flood Risk Management Guidelines, taking precautionary approach and using in-field observations.

**No changes to the Draft Plan or SFRA Report are required.**

### **Issue 10 - Ballincar**

The 0.1% AEP NIFM extents have been used to establish Flood Zone B; however the area is also within the 1% AEP NIFM extents and this area is not shown as within Flood Zone A.



*Ballincar - SFRA, NIFM Present Day Scenario*



*Ballincar - SFRA, Indicative Flood Zones Map*

### **Response**

The observation is noted. Flood Zones will be updated to include Flood Zone A at this location.

### **Recommendation**

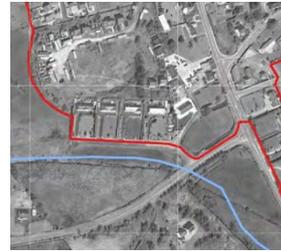
**CE-SFRA-04** In the **SFRA Report**, include Flood Zone A on the Ballincar Flood Zones Map.

## Issue 11 - Ballygawley

There is an area to the south which is shown at risk of flooding in the 0.1% AEP NIFM extents, however this area is not shown as within Flood Zone B. The settlement is unserviced and therefore has no land use zonings. The lands within Flood Zone B would not be appropriate for highly vulnerable development such as residential.



*Ballygawley - SFRA, NIFM Present Day Scenario*



*Ballygawley - SFRA, Indicative Flood Zones Map*

## Response

The observation is noted. The development limit for Ballygawley should be amended to omit the full site located within Flood Zone B.

## Recommendation

**CE-53Z-01** In **Chapter 53 Inserviced Villages, on the Development Limit Map**, amend the development limit to exclude the lands located within Flood Zone B to the south of the village.

## Issue 12 - Ballymote

There is an area shown at risk of flooding in the 1% AEP CFRAM extents which appears to have been omitted from Flood Zone A extents.



*Ballymote – SFRA, CFRAM Present Day Scenario*

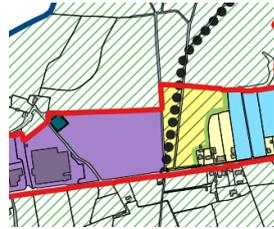


*Ballymote – SFRA, Indicative Flood Zones Map*

A Justification Test has been supplied for the redevelopment of a brownfield site as *Business Park - Industrial Estate* that is within the omitted Flood Zone A extents. The Justification Test notes that “*the site is slightly removed from the town*” and that “*no other suitable site is available*”.

From the National CFRAM 1% AEP extents, it can be seen that this site would be situated fully within Flood Zone A. Sligo County Council must ensure that the flood risk can be managed and that redevelopment of this site will not increase flood risk to other areas. Sligo County Council could also consider if this site would offer opportunities to reduce flood risk in the area instead of redeveloping.

Furthermore, the submission notes that there is an unmapped watercourse which flows through Ballymote close to where *Business, Industrial, Enterprise* and *Strategic Reserve* land use zonings are proposed. It is unclear if a flood risk assessment has been carried out to inform the zoning and planning decisions.



*Ballymote – SFRA, Indicative Flood Zone Map*      *Ballymote - Draft Zone Map*

## Response

The observations are noted. The Ballymote Flood Zones Map should be updated to include Flood Zone A in the north of the town.

The findings of the Justification Test for the BIE-zoned portion of the subject lands are included in the SFRA. Taking into account the various parts of criterion no. 2 of the Justification Test, Sligo County Council has determined that the zoning of the lands is required to achieve the proper planning and sustainable development of the settlement. Furthermore, and as identified in the SFRA under the Justification Test for these lands:

*“A Stage 1 and 2 Flood Risk Assessment has been undertaken as part of the plan preparation process. This level of assessment is considered appropriate and has informed the zoning proposals and policies and objectives contained in the Plan.*

*Section 4 of the SFRA outlines the measures integrated into Plan to adequately manage flood risks. A precautionary approach has been applied to the zoning of lands with undeveloped lands that is liable to flood generally zoned for “Open Space or Recreational Amenities”. Future development will be subject to site-specific flood risk assessments, and comply with the flood risk management provisions of the Plan, including structural and non-structural risk management measures. This is in order to ensure that flood hazard and risk to the area and to other adjoining locations will not be increased or, if practicable, will be reduced. Overlaps between land-use Zoning and Flood Zones have been mapped to clearly indicate lands constrained by flood risk. Development is subject to the policies, objectives and requirements of the Plan that relate to flood risk and climate change.”*

Regarding the identified watercourse to the east of the town centre, Flood Zone A should be updated and amendments to the zoning map should be made to change a strip of land from being zoned residential to open space.

## Recommendations

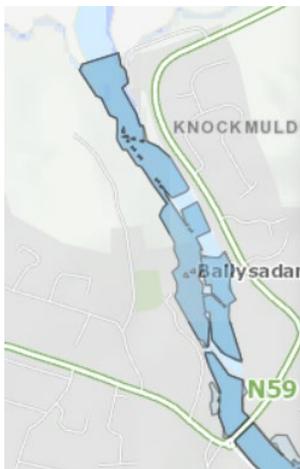
**CE-SFRA-05** In the **SFRA Report**, correct the boundaries of Flood Zone A on the Ballymote Flood Zones Map in the northern part of the town.

**CE-SFRA-06** In the **SFRA Report**, include Flood Zone A on the Ballymote Flood Zones Map along the identified watercourse in the western part of the town.

**CE-12Z-01** In **Chapter 12 Ballymote Town Plan**, on the **Zoning Map**, the strip of land located within Flood Zone A in the western part of the town should be rezoned from nRES (SLR) to OS and the indicative road corridor should be moved to the east.

## Issue 13 - Ballysadare

An area shown at risk of flooding in the 1% AEP CFRAM extents appears to have been omitted from Flood Zone A extents. Sligo County Council should review.



*Ballysadare - floodinfo, 1% and 0.1% AEP flood extents*      *Ballysadare - SFRA, Indicative Flood Zones Map*

## Response

Noted. Flood Zones will be updated to include Flood Zone A at this location.

## Recommendation

**CE-SFRA-07** In the **SFRA Report**, correct the boundaries of **Flood Zone A on the Ballysadare Flood Zones Map** to include the area shown in the OPW's submission 73.

## Issue 14 - Castlebaldwin

There is an unmapped watercourse which flows through Castlebaldwin where the *Rural Village* land use zoning is proposed. It is unclear if a flood risk assessment has been carried out to inform the zoning and planning decisions.



Castlebaldwin – SFRA, Indicative Flood Zone Map



Castlebaldwin - Draft Zone Map

### Response

The observation is noted. Flood Zones should be updated at this location and the lands zoned TU should be changed to the less vulnerable Open Space zoning.

### Recommendations

- CE-SFRA-08** In the **SFRA Report**, include Flood Zone A on the Castlebaldwin Flood Zones Map in the area shown in the OPW's submission 73.
- CE-42Z-01** In **Chapter 42 Castlebaldwin Village Plan**, on the **Zoning Map**, change the zoning of the lands zoned TU to OS.

## Issue 15 - Cliffony

There is an area zoned as *Open Space and Recreational Amenities* which is within Flood Zone B on the Flood Zone map. The watercourse at this location appears to be a watercourse which was not included in either the National CFRAM or NIFM programmes. Sligo County Council might confirm the dataset that has been used to establish that this area is within the Flood Zones. The Flood Zones are determined on the basis of the probability of river and coastal flooding only.

### Response

The comments are noted. Flood Zones associated with this water body, which is of a relatively small catchment, were delineated by the SFRA as per the Flood Risk Management Guidelines, taking precautionary approach and using in-field observations.

**No changes to the SFRA Report or to the Draft Plan are required.**

## Issue 16 - Geevagh

It appears that the 5% AEP NIFM extents have been used to establish Flood Zone A instead of the 1% AEP extents. Sligo County Council should review to ensure correct extents have been used to establish Flood Zone A.



*Geevagh - SFRA, NIFM Present Day Scenario*



*Geevagh - SFRA, Indicative Flood Zones Map*

## Response

The screengrab above (included in the OPW's submission) appears to be of the High-End Future climate change Scenario flood extents. The SFRA mapping is as intended and has integrated Present Day flood extents into the Flood Zones.

**No changes to the SFRA Report or to the Draft Plan are required.**

## Issue 17 - Gorteen

Flood Zone B has been omitted from the Flood Zone Map.



*Gorteen - SFRA, CFRAM Present Day Scenario*



*Gorteen - SFRA, Indicative Flood Zones Map*

## Response

The observation is noted. Flood Zone B should be updated to include Flood Zone B at this location.

## Recommendation

**CE-SFRA-10** In the **SFRA Report**, include **Flood Zone B on the Gorteen Flood Zones Map** in the area shown in the OPW's submission 73.

## Issue 18 - Grange

There is an unmapped watercourse which flows through Grange where *Tourism, New Residential, Mixed Use and Business, Industrial, Enterprise* land use zonings are proposed. It is unclear if a flood risk assessment has been carried out to inform the zoning and planning decisions.



Grange – SFRA, Indicative Flood Zone Map

Grange - Draft Zone Map

### Response

The observation is noted. Flood Zones should be updated at this location and corresponding changes to the zoning map should be made.

### Recommendation

**CE-SFRA-09** In the **SFRA Report**, review the **boundaries of Flood Zones on the Grange Flood Zones Map** in the area shown in the OPW's submission 73.

**CE-18Z-01** In **Chapter 18 Grange Village Plan**, on the **Zoning Map**, change the zoning of the lands on the southern portion of the undeveloped site fronting onto the N15 from Mix to OS where it overlaps with Flood Zones A and B, as shown on the CE-Recommended Zoning Amendments Map for Grange.

## Issue 19 - Rathcormac

There is an area zoned as *Unserviced Rural Village* which is within Flood Zone A on the Flood Zone map. NIFM and NCFHM extents do not appear to extend into the settlement area. Sligo County Council might confirm the dataset that has been used to establish that this area is within the Flood Zones. The Flood Zones are determined on the basis of the probability of river and coastal flooding only.

### Response

The area in question is not zoned, as there is no “unserviced rural village” zoning objective.

However, the comments are noted. Flood Zones associated with this water body, which is of a relatively small catchment, were delineated by the SFRA as per the Flood Risk Management Guidelines, taking precautionary approach and using in-field observations.

**No changes to the SFRA Report or to the Draft Plan are required.**

## Issue 20 - Sligo Town

Flood Mapping produced under the National CFRAM Programme is currently under review as part of the Map Review Programme. The OPW requests that Sligo County Council note that the mapping in this area may change as part of the review process.

There is an area shown at risk of flooding in the 1% AEP CFRAM extents that has been omitted from Flood Zone A.



*Sligo Town - SFRA, CFRAM Present Day Scenario*



*Sligo Town - SFRA, Indicative Flood Zones Map*

### Response

The observation is noted. Flood Zone A should be updated at this location.

### Recommendation

**CE-SFRA-03** In the **SFRA Report**, include **Flood Zone A on the Sligo Town Flood Zones Map** in the area shown in the OPW's submission 73.

## Issue 21 - Strandhill

There is a small area shown at risk of flooding in the 0.5% and 0.1% AEP NCFHM extents that has been omitted from Flood Zone A and B.



*Strandhill - Floodinfo, NCFHM Present Day Scenario*



*Strandhill - SFRA, Indicative Flood Zones Map*

### Response

The comments are noted. This data has been groundtruthed and the Flood Zones included in the SFRA are appropriate.

**No changes are required to the SFRA Report or to the Draft Plan.**

## Submission 76

### Department of Education

<https://consult.sligococo.ie/en/submission/slg-c29-76>

The Department welcomes the Draft Plan and its provisions for the larger settlements in County Sligo, noting a potential population increase of 4,802 persons between 2022 and 2030.

The submission notes that numbers of young people aged 0 -15 years are declining on an annual basis, resulting in a reduction in primary school enrolment levels. At the same time, enrolment at post-primary level is currently on an upward trajectory and will remain so for most of the lifetime of the development plan.

Notwithstanding the above trends, the Department considers that there will be areas of planned concentrated population growth which may necessitate either expansion of existing primary schools or provision of new schools.

There are currently 78 schools in Co. Sligo (63 mainstream primary, 2 special schools and 13 post-primary). Where additional provision is required at primary or post primary level, this can be achieved through:

- Utilising existing unused capacity within schools
- Extending the capacity of schools
- Provision of a new school (or more schools)

The submission from the Department of Education contains observation of future school place provision in nine settlements identified in the Core Strategy of the Draft CDP. These are summarised below.

#### Issue 1 – School places in Sligo Town

There are eight mainstream primary schools, one special school and five post-primary schools, in Sligo Town. Having considered projected population growth in the settlement, the Department of Education has identified a potential future requirement for the provision of additional primary school places in Sligo Town.

The submission indicates that “it may be prudent to reserve a suitably zoned site for a potential future new primary school” and that the Plan should include “explicit support” in for the provision of additional school accommodation in Sligo Town.

At post primary level, the Department’s preference would be to expand the existing facilities, should there be a requirement for additional school places because of the planned population increases.

#### Response

There is a substantial area of undeveloped land zoned for community facilities (CF) adjoining the Western Distributor Road, to the south-west of the existing built-up area of Sligo Town. There is sufficient scope to provide a new school in this area, or even on lands zoned for residential and mixed uses, where future urban growth is planned.

Identification of a particular site could be pursued as part of the preparation of the forthcoming Local Area Plan for Sligo and Environs or any masterplan for the specific area.

While the educational facilities policy P-ED-1 supports the provision of schools in a variety of land-use zoning categories, there is no objection to the inclusion of additional text and an additional policy to support the provision of a new primary school in Sligo Town in conjunction with the planned major urban extension to the south-west.

## Recommendations

**CE-27-01** In **Section 27.3 Educational facilities** (Volume 3, Chapter 27, p. 62), under the heading “**Planned educational facilities**”, insert additional narrative as follows:

Having considered projected population growth in Sligo Town, the Department of Education has identified a potential future requirement for the provision of additional primary school places in Sligo Town, possibly in the form of a new school to be delivered in conjunction with planned urban expansion. An appropriate location would be the area zoned for new residential, mixed and community uses to the south-west of the existing built-up area of Sligo Town.

**CE-27-02** In the same **Section 27.3**, amend policy **P-ED-3** as follows:

**P-ED-3** Support Sligo’s schools in the upgrading, and modernisation and expansion of their building stock, so as to ensure that these institutions can accommodate population growth.

**CE-27-03** In the same **Section 27.3**, insert an additional policy as follows:

**P-ED-5** Pursue the provision of a new primary school in Sligo Town, in conjunction with any planned, large urban extension, based on a masterplan or other appropriate planning framework applicable to the lands zoned for community facilities or residential development and, mixed uses to the south-west of the Town’s built-up area.

## Issue 2 – School places in other settlements

In the settlements of Ballymote, Enniscrone, Tobercurry, Ballysadare, Collooney, Coolaney, Grange and Strandhill, there is no anticipated requirement for new schools in conjunction with the projected levels of population increase. There may be requirements for additional primary school places in Tobercurry, Ballysadare, Collooney and Strandhill, all of which can be met by expansion of existing facilities.

### Response

The Department’s observations are noted. **No change to the Draft Plan is required.**

## Issue 3 – “Buffer zones”

The Department requests the inclusion of “buffer zones and land-use designations that support education development adjacent to existing and established schools as these will be critical in meeting school accommodation requirements in existing built-up areas”.

### Response

Policy P-ED-3, as modified by the wording proposed under **CE-27-02**, ensures that Sligo’s schools are supported if they need to expand.

A wide variety of zoning objectives allow the provision of new schools or the expansion of existing ones. It is not considered necessary to designate “buffer zones” around existing schools.

**No change to the Draft Plan is necessary on foot of this request.**

## **Issue 4 – “Supporting infrastructure”**

The Department requests that the capacity of existing schools and any planned schools, as published by the Department, be considered as “supporting infrastructure and facilities” and given high priority in Sligo County Council’s assessment of the suitability of specific lands for residential development.

### **Response**

The *distance to existing primary schools* has been used as a criterion in the Settlement Capacity Audits which provided the basis for zoning decisions as part of the Draft Plan.

The Department’s submission has already clarified that existing schools have sufficient capacity to accommodate primary and post-primary school population, and that only one primary school will be required in Sligo Town in conjunction with future residential development (Issue 1 addressed above).

**No change to the Draft Plan is necessary on foot of this request.**

## **Issue 5 – “Urban design schools”**

Support for urban design schools in established areas would be welcome. In particular, measures to facilitate reduced requirements for on-site parking and set-down, and to support access to off-site public amenities and facilities is essential to achieving the delivery of schools in the urban carbon-neutral model promoted in the NPF.

### **Response**

It is not clear what the Department means by “urban design schools”. Policy P-ED-2 supports the provision of schools in existing settlements, i.e. “established areas”, where access to public amenities and facilities is optimal.

Parking standards have been reduced to lower levels than those specified in the current CDP (2017), as illustrated in Table 33.10 (Chapter 33 in Volume 3 of the Draft Plan). At the same time, the Draft Plan includes, for the first time, bicycle parking standards, which require minimum 10 spaces, or 10% of pupil numbers, for each school – see Table 33.9 in the same chapter.

The County Council will continue to develop the NTA-funded Safe Routes to School Schemes, as specified in Section 29.4 Active travel infrastructure (Chapter 29 Transport infrastructure).

**No change to the Draft Plan is necessary on foot of this request.**

## **Issue 6 – Land reservation for school expansions**

The Department notes and welcomes the zoning and objectives securing the possible future expansion of schools in Collooney (St. Joseph's primary school), Coolaney–Rockfield (primary school at Rockfield), Grange (national school), Easky (secondary school), Ballinacarrow (primary school).

The submission indicates that the 2023 School Building Programme included two large-scale projects in County Sligo: Gaelscoil Chnoc Na Re and the Ursuline College.

In addition to site reservation through the specific zoning of land for the provision of community facilities, the Department recommends that education and related uses should also be favourably considered within other zoning categories, thereby ensuring sufficient flexibility to accommodate future needs.

### **Response**

The recommendation is noted. The Zoning Matrix included in Chapter 10 (Volume 2) of the Draft Plan indicates that schools are normally permitted or open to consideration in no less than 10 zoning categories – town centre (zones 1 and 2), residential and mixed-use areas, neighbourhood centres, community facilities, business/enterprise areas, tourism-related uses and in rural villages.

**No change to the Draft Plan is required on foot of the above recommendation.**

## Submission 102

### National Transport Authority (NTA)

<https://consult.sligococo.ie/en/submission/slg-c29-102>

The National Transport Authority (NTA) welcomes the opportunity to comment on the Draft Plan, on the basis of the NWRA's *Regional Spatial and Economic Strategy*, national policies and guidelines.

#### Issue 1 – Masterplanning large greenfield sites in Sligo Town

The Plan contains a number of large areas of undeveloped zoned land in the northeast and southwest of Sligo Town. The lands to the south have barriers to connection including the N4 and the railway line. It will be important to ensure that appropriate sustainable transport options are provided as part of their development. The lands to the north are served by the S1 bus on the western side. However, in order to ensure that access by bus is possible for the entire site, permeability into and through the site should be provided. All lands should be subject to the preparation of masterplans to ensure sustainable transport is integrated into the development.

The NTA recommends that the large undeveloped sites be subject to objectives to prepare masterplans, in order to ensure that land-use and transport can be fully integrated.

#### Response

Section 10.4 Masterplanning urban extensions (Chapter 10 Urban development principles) indicates that towns should expand on the basis of masterplans for defined larger areas. It is agreed that this section should be accompanied by a corresponding Compact growth policy.

#### Recommendation

**CE-10-04** In Section 10.4 **Compact growth** (Chapter 10 Urban development principles), insert an additional **Compact growth policy** as follows:

**P-CG-6** Ensure that large areas of greenfield zoned land in towns and villages are developed on the basis of masterplans, to be prepared by or in consultation with the Planning Authority, in order to ensure appropriate integration of land-use and transport.

#### Issue 2 – Average residential densities

The Plan contains designated lands as *Settlement Consolidation Sites*, where the recommended average residential density is 35 unit per hectare. The recently published *Sustainable and Compact Settlement Guidelines for Planning Authorities* outline proposed densities for Regional Growth Centres both for town centre and urban extension locations, ranging from 40-150 dph and 30-80 dph.

The NTA recommends that “in order to promote the sustainable use of land and to maximise the potential for sustainable travel within the town, that lands designated at settlement consolidation sites in Sligo town would be appropriate for higher densities than 35 units per hectare, as in accordance with the Compact Settlement Guidelines”.

## Response

The average density of 35 u/ha is not a “recommended density”. The figure has been used in the Core Strategy only for the purpose of estimating the minimum potential yield of lands zoned for residential development. In practice, housing densities above 35u/ha are and will continue to be recommended at pre-application stage, where appropriate.

The final version of the ***Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities*** was published on 15 January 2024. As the Development Plan is required to be consistent with all Section 28 Guidelines, the Chief Executive has made a set of supplementary recommendations for amendments to the Draft Plan. These are listed in **Section 9 of this Report**.

**No other change to the Draft Plan is required on foot of this suggestion.**

## Issue 3 - Sligo Local Transport Plan

The NTA has worked with Sligo County Council in the preparation of the Sligo Local Transport Plan. The Plan puts forward measures for the improvement of transport and active travel within the town. The submission suggests that the LTP “should now be assessed against the proposed zonings for Sligo Town to ensure the integration of land use and transport planning”.

The NTA agrees that the measures and proposals arising from the LTP should be included as objectives in the forthcoming *Sligo and Environs Local Area Plan*.

## Response

The LTP was prepared in parallel with the Draft Plan (including draft zoning for Sligo Town), with the objective of ensuring integration between land-use and transportation. The active travel measures proposed in the LTP are aligned with areas where future growth is identified on the Sligo Town zoning map.

**No change to Draft Plan is required.**

## Issue 4 – Filtered permeability

The submission notes that Volume 2, Urban Development, Chapter 10 includes text in relation to the importance of grid layouts, whereby pedestrians and cyclists can move freely between links:

*The main objective in designing new connections should be to create a grid. This can have either a regular or irregular shape, but it is important that each end of a street or path connects to others. Grid street networks are easy to understand and navigate, particularly for pedestrians and cyclists. They allow for easy orientation and minimize the distances between origins and destinations. This can result in shorter travel times and reduced congestion. (Vol. 2, Chapter 10, p. 10)*

It is indicated that pedestrians and cyclists can also benefit from filtered permeability, whereby links are provided for these modes only.

This NTA suggests that the statement on p. 10 of volume 2 could be strengthened by the inclusion of reference to the concept of filtered permeability.

## Response

The suggestion is agreed.

## Recommendation

**CE-10-06** In **Section 10.4.4 Connectivity – new circulation networks** (Chapter 10 Urban development principles, Volume 2) amend the third paragraph as follows:

The main objective in designing new connections should be to create a grid. This can have either a regular or irregular shape, but it is important that each end of a street or path connects to others. Grid street networks are easy to understand and navigate, particularly for pedestrians and cyclists. They allow for easy orientation and minimize the distances between origins and destinations. This can result in shorter travel times and reduced congestion.

*Pedestrians and cyclists can further benefit from filtered permeability, whereby links are provided for these modes only, thus offering a clear advantage over vehicular traffic.*

## Issue 5 – Strategic transport objectives in Chapter 11 Sligo Town

The submission notes that Chapter 11 Sligo Town (Volume 2, Urban Development) contains the strategic transport objectives for Sligo town. Section 11.3.1 Transport and Mobility includes 'Strategic Objectives – Urban Roads' and Section 11.3.2 Green Corridors includes 'Strategic Objectives – Green Corridors'.

It does not appear that there are any Strategic Objectives related to public transport or active travel (other than greenways). The NTA recommends that Chapter 11 include transport objectives related to public transport (*Connecting Ireland*) and to cycle infrastructure (*National Cycle Network Plan* and *CycleConnects*).

## Response

Public transport initiatives such as Connecting Ireland are the responsibility of the NTA. The Development Plan makes adequate provision for strategic urban roads, which can be used by buses along with other vehicular traffic.

The National Cycle Network Plan (Department of Transport, 2023) relates to inter-urban cycle routes. Chapter 11 of the Draft Plan contains strategic objectives applicable exclusively to Sligo Town. The urban cycle network proposals for Sligo Town, as presented on the NTA's CycleConnects map, have been included in the Draft Sligo LTP and will provide the basis for objectives in the forthcoming *Sligo and Environs Local Area Plan*.

**No changes to the Draft Plan are required on foot of the above.**

## Issue 6 – Strategic transport objective SO-UR-4 in Chapter 11 Sligo Town

In relation to the Strategic urban road objective SO-UR-4, the NTA "has stated as part of the preparation of the LTP that the requirement for local-level road objectives is not clear and that sustainable modes of transport including walking, cycling and public transport can be provided for without the requirement to develop new roads in all cases".

The requirement for these local roads would best be examined as part of the Local Area Plan process.

*SO-UR-4 Reserve indicative corridors for the construction of the following roads:*

- A. *From the Eastern Garavogue Bridge and Approach Roads northwards to connect with the N-16 at Yeats Heights/Abbie Roundabout.*
- B. *From Tonafortes/Ballyfree northwards to the Summerhill Roundabout.*

- C. *From Pearse Road (R-287), adjacent to the proposed Neighbourhood Centre at Cornageeha (in the vicinity of Sligo Park Hotel), to Newtownholmes Road.*
- D. *From the junction of Burton Street / Pearse Road to the junction of Mail Coach Road / Connolly Street.*
- E. *From Temple Street / Flynn's Terrace to Ray MacSharry Road.*

The NTA recommends the exclusion of local roads under objective SO-UR-4.

## Response

The road reservations listed under the Strategic objective SO-UR-4 are T2-level objectives of the Sligo and Environs Plan, which is incorporated in the current County Development Plan. These objectives have been adopted by the Council in 2010.

All the above roads are required to improve permeability and will assist in the provision of enhanced public transport routes across the town.

**No change to the Draft Plan is required.**

## Issue 7 – National transport policy in Volume 3

The submission states that Chapter 29 Transport Infrastructure (Volume 3), does not include reference to the current policy context for transport infrastructure including the *National Investment Framework for Transport in Ireland (NIFTI)* and the *National Sustainable Mobility Policy*.

The NTA recommends that Chapter 29 “should be underpinned and informed by transport policy, including the *National Investment Framework for Transport in Ireland (NIFTI)* and the *National Sustainable Mobility Policy*”.

## Response

The above-quoted national policies have been addressed in Chapter 9 Transport Strategy, in Volume 1 Core Strategy. **No change to Chapter 29 or other sections of the Draft Plan is required.**

## Issue 8 – Cycling and walking policies in Chapter 29

The NTA welcomes the transport objectives contained in Volume 3 Chapter 29 Transport Infrastructure. It is suggested that the Cycling and Walking Policies could be enhanced by the inclusion of a policy related to the use of filtered permeability as a method to enhance and develop the pedestrian and cycle networks in the County to facilitate trips by active modes.

It is also suggested that Policy P-CW-1 could be strengthened to include reference to the use of active modes of transport for all types of everyday trips:

- P-CW -1 Promote cycling and walking as a sustainable and viable **mode of everyday transport including for commuting, education, retail and leisure purposes** ~~mode of transport~~ by making provision for the safe and efficient movement of cyclists and pedestrians at public transportation nodes, ~~and~~ village/town centres, public car parks, **retail centres, leisure facilities** and Institutions.*

A further suggestion is to include an additional policy supporting the provision of the existing bicycle rental scheme in Sligo Town.

## Response

The first two suggestions are accepted.

In relation to the existing electric bicycle rental scheme in Sligo Town, it is considered inappropriate to support a particular private business to the detriment of potential competitors. A more suitable policy would be to facilitate the development of services and utilities for electric bikes throughout the County. Such facilities could be used by all electric bike owners and any rental bike provider, not just the existing one.

## Recommendations

**CE-29-11** In **Section 29.4 Active travel infrastructure** (Chapter 29, Volume 3), amend the **Cycling and walking policy P-CW-1** as follows:

**P-CW-1** Promote cycling and walking as a sustainable and viable **modes of everyday transport, including for commuting, education, retail and leisure purposes, mode of transport** by making provision for the safe and efficient movement of cyclists and pedestrians at public transportation nodes, **and village/town centres, public car parks, retail centres, leisure facilities** and institutions.

**CE-29-12** In **Section 29.4 Active travel infrastructure** (Chapter 29, Volume 3), amend the **Cycling and walking policy P-CW-5** as follows:

**P-CW-5** Provide, improve and extend cycle and pedestrian routes on existing roads, proposed roads, roads being upgraded and green corridors (including river corridors), **and make provision for filtered permeability** where feasible and practical, **and** subject to compliance with legislative requirements.

**CE-29-13** In **Section 29.4 Active travel infrastructure** (Chapter 29, Volume 3), amend the **Cycling and walking policy P-CW-6** as follows:

**P-CW-6** Support the development of the cycling routes identified in the final NTA document **CycleConnects** **and facilitate the development of services and utilities for electric bikes throughout the County.**

## Issue 9 – Travel demand management

The NTA considers that “it may be beneficial to include policies to support the concept of travel demand management measures as well as traffic management schemes, which reduce and manage the requirement of travel”. The submission suggests the inclusion of a policy in this regard – “relating to the potential for traffic management schemes to facilitate the safe and efficient movement of transport users in accordance with the hierarchy of transport users”.

## Response

The Plan’s strong support for compact growth and local economic development in towns and larger villages should, over time, diminish the need to travel to larger urban centres.

The Council will consider opportunities to reduce traffic volumes by implementing appropriate travel demand measures on an operational basis, through traffic management plans and schemes (some of which are specified as objectives in the settlement plans included in Volume 2 Urban development).

**No change to the Draft Plan is required.**

## **Issue 10 – Enhancement of Sligo Train Station**

The submission suggests facilitating the enhancement of Sligo Train Station, including the improvement of access arrangements for pedestrians and cyclists and the possibility of improving car parking at this location. The provision of enhanced car parking at the train station should take into consideration access by foot and bike, as well as the requirement to facilitate or not to impede bus services.

The NTA recommends inclusion of a policy indicating “that the planning authority will work with service providers and the NTA in delivering improvements to Sligo Train Station where required”.

### **Response**

The suggestion is noted, but it is considered that policies or objectives relating to enhancements at Sligo Train Station should be included in the forthcoming Local Area Plan for Sligo Town.

**No change to the Draft Plan is required.**

## Submission 109

### Electricity Supply Board (ESB)

<https://consult.sligococo.ie/en/submission/slg-c29-109>

Electricity Supply Board (ESB) broadly supports the vision included in Draft CDP, noting that “mitigating the impacts of, and adapting to, climate change is one of the key challenges identified in the document”.

Specifically, the ESB supports the following:

- the inclusion of the strategic policy for climate action SP-CA-1 in Chapter 2 Climate Action (Volume 1 Core Strategy) of the Draft Plan;
- the policies and objectives set out in Chapter 31 *Energy and Telecommunications*, and in particular policies P-EN-1 and P-EN-2, and objective O-REN-1;
- the proposed TC2 (Commercial and Mixed Uses) zoning of the ESB property (depot and engineering centre) at Cranmore Road in Sligo Town. The zoning is considered compatible with existing and possible future activities on site, and with surrounding land uses.

The submission contains a series of observations and suggestions relating to the continuing advancement in renewables technology, which should be taken into consideration in the preparation of the final Sligo CDP 2024–2030.

### Issue 1 – Renewable Energy Strategy

The submission notes that the draft plan does not contain a Wind Energy Map, suggesting that such map could be included in the forthcoming Renewable Energy Strategy.

It is requested that Objective O-REN-1 is amended to include “a time bound target for completion of a Renewable Energy Strategy” e.g. “*within 1 year following the publication of the Regional Renewable Electricity Strategy and the revised Methodology for Local Authority Renewable Energy Strategies, as provided in the Climate Action Plan 2023*”.

### Response

The observation is noted. The issue has been addressed in the Chief Executive's response to Submission 184 (OPR) in **Section 4** of this Report.

**No further change to the Draft Plan is required on foot of this observation.**

### Issue 2 – Wind Energy Guidelines

ESB advises that the final sentence of Section 31.3.1 *Wind Energy* – stating that the Planning Authority will continue to assess all wind energy development proposed using criteria set out in the DECLG's *Wind Energy Guidelines* (2006) – should be amended to be consistent with the *Development Management Standards* for Wind Energy Developments outlined in Section 33.11.1 of the Chapter 33 of the Draft CDP, which refer to the DHLGH's *Draft Wind Energy Guidelines* (2019) and any revised guidelines.

## Response

Noted and agreed.

## Recommendation

**CE-33-22** In **Section 33.11.1 Wind energy developments** (p. 182 of the Draft Plan), amend the first sentence as follows:

The Planning Authority will have regard to [the DECLG's Wind Energy Guidelines \(2006\)](#), the DHLGH's Draft Wind Energy Guidelines (2019) and any revised guidelines, when considering wind energy applications.

## Issue 3 – “Case-by-case” environmental assessments

Regarding Policy P-EN-2, ESB suggests that each energy project should be evaluated “on a case-by-case basis and over-restrictive policies should not prevent consideration of all options with a view to identifying the optimum solution”. This is indicated in the (2019) *Draft Wind Energy Guidelines*, under the heading *Natural Heritage and Biodiversity - “The Habitats Directive does not, a priori, exclude wind energy developments in or adjacent to Natura 2000 sites. These need to be judged on a case-by-case basis.”*

## Response

The wording of the energy policy P-EN-2 does not automatically exclude developments adjoining or within Natura 200 sites. The policy clearly states that all such development proposals will be assessed for their potential impact on such areas.

**No change to the Draft Plan is required on foot of the above observation.**

## Issue 4 – Repowering existing wind farms

ESB supports the inclusion of supporting objectives for repowering of existing wind farms. Repowering can grant a new lease of life to existing renewable energy projects by extending the planning lifetime of an existing windfarm with no, or minimal, new development.

Repowering of existing sites may involve a complex redesign, which may include reconfiguration of turbine design, site access, internal roads, etc.

The submission requests the strengthening of Policy P-EN-2 to include support for repowering projects by amending the wording as shown in **bold font** below.

*“Facilitate the production of energy from renewable sources and secure the maximum potential from wind energy resources within County Sligo, **including the augmentation, upgrading and improvements to existing windfarms** subject to strict location, siting and design criteria...”*

## Response

The request is noted and agreed.

## Recommendation

**CE-31-01** In **Chapter 31 Energy and telecommunications**, amend the wording in the first paragraph of **policy P-EN-2** as follows:

**P-EN-2** Facilitate the production of energy from renewable sources and secure the maximum potential from wind energy resources within County Sligo, including the augmentation, upgrading and improvements to existing wind farms, subject to strict location, siting and design criteria.

## Issue 5 – Offshore wind and marine renewable energy

ESB welcomes the commitment of Sligo County Council to provide input to the relevant stages of the Offshore Renewable Energy Development Plan (OREDPA) II as indicated in Section 31.3.2 Offshore wind, wave and tidal energy (Chapter 31, Volume 3 of the Draft Plan).

The submission requests the inclusion of a new policy, P-EN-6, to support the ESB in advancing marine renewable energy projects, worded as follows:

*“To support the ocean energy research, development and demonstration pathway for emerging marine technologies (wave, tidal, floating wind) and associated test infrastructure.”*

## Response

The request is noted and agreed.

## Recommendation

**CE-31-04** Include an **additional energy policy in Chapter 31** as follows:

**P-EN-6** Support the ocean energy research, development and demonstration pathway for emerging marine technologies (wave, tidal, floating wind, other types of marine energy developments) and facilitate the provision of associated test infrastructure.

## Issue 6 – Solar energy

Policy P-EN-4 indicates the Council's support for enterprises seeking to generate energy on-site for their own needs. ESB would welcome an expansion of this policy to include provision for farmers and small rural communities, as stated in Section 31.3.5 Solar Energy:

*“Solar farms are normally built on agricultural land and leave room for dual land use so that farm practices, such as grazing, can co-exist with the solar panels. **Farmers and small rural communities** will be encouraged to produce their own solar energy, both for self-supply and for selling to the grid.”*

## Response

The request is noted and agreed. Both Policy P-EN-4 and P-EN-5 should be amended to provide for farmers and small rural communities.

## Recommendations

**CE-31-02** In **Chapter 31**, amend the **policy P-EN-4** as follows:

**P-EN-4** Support existing and new enterprises that wish to use renewable energy to serve their own needs by on-site energy production, **as well as farm diversification into solar energy production for own use or selling to the grid**, subject to normal planning considerations.

**CE-31-03** In **Chapter 31**, amend the **policy P-EN-5** as follows:

**P-EN-5** Collaborate with urban and rural communities in the development of community-level energy efficiency and renewable energy projects, **including solar energy developments where suitable**, subject to visual, landscape, heritage, environmental and amenity considerations.

## Issue 7 – Energy storage

Energy Storage systems such as batteries and green hydrogen storage, along with grid stability services, are some of the technologies being explored by the ESB, which is already installing Battery Energy Storage Systems (BESS) at existing facilities at Aghada in Cork and at Inchicore in Dublin. These batteries can stabilise the frequency of the electricity network, further enabling the operation and stability of a highly renewable system. ESB has also recently installed a synchronous condenser at Moneypoint, Co. Clare, which is the first in the country and incorporates the world's largest flywheel for grid stability. The grid stability provided by the synchronous condenser replaces and displaces a fossil-fuel generator.

The submission indicates that ESB has partnered with a private company in the assessment and development of Irish offshore green hydrogen subsurface storage. Green Hydrogen, which is produced from renewable energy sources, offers potential for large scale seasonal storage of variable renewable energy. It is requested that the Draft Plan specifically support these new technologies and include a relevant policy worded as follows:

*“Support and facilitate proposals for secure, appropriately scaled energy storage systems and infrastructure, including green hydrogen gas storage which support energy efficiency and reusable energy systems, provided such proposals accord with the principles of proper planning and sustainable development of the area.”*

## Response

The suggestion to include provision on energy storage is noted and agreed. A short narrative should be added to Section 31.3, accompanied by a corresponding additional energy policy.

## Recommendations

**CE-31-07** In **Chapter 31**, **Section 31.3 Renewable energy**, insert the following additional subsection:

### **31.3.8 Energy storage**

Energy storage systems such as batteries and green hydrogen storage, along with grid stability services, are some of the technologies that will be essential to smoothing out the natural variability that occurs in renewable energy sources and to provide electricity at times of peak demand.

Utility-scale battery storage systems enable more efficient use of renewable energy. "Green hydrogen", which is produced from renewable energy sources, offers potential for large-scale, seasonal storage of variable renewable energy. This enables zero-carbon backup to the power system when intermittent renewables such as wind and solar power are not available.

**CE-31-05** In **Chapter 31** insert the following **additional energy policy**:

**P-EN-7** Facilitate proposals for secure, appropriately-scaled energy storage infrastructure, including green hydrogen gas storage, which support energy efficiency and reusable energy systems, subject to assessment of their potential impact on communities, environmental assessments and normal planning considerations.

## Issue 8 – Hybrid renewables

The submission discusses "hybrid renewables", which consist of two or more renewable energy sources used together to provide increased system efficiency, whilst optimising use of existing infrastructure.

It states: "Repowering with hybrid renewables can grant a new lease of life to existing windfarms and other generation sites. Utilising existing infrastructure will enable accelerated connection of onshore and offshore wind to the system. By utilising hybrid connections, offshore wind projects can be efficiently delivered in a more cost-effective manner when compared to building a dedicated offshore wind grid electrical connection infrastructure".

For the reasons listed above, the ESB suggests the inclusion of support for the concept of Hybrid Renewables in the Draft Plan, in the form of an objective worded as follows:

*"Support and facilitate proposals for hybrid energy systems and/or co-location of renewable energy where applicable where such development has satisfactorily demonstrated that it will not have adverse impacts on the surrounding environment."*

## Response

The suggestion to include appropriate reference and policy on hybrid renewables is agreed. A short narrative should be added after the first paragraph in the beginning of Section 31.3, and a new policy, P-EN-9 should be added to the energy policies.

## Recommendations

**CE-31-09** In **Chapter 31, Section 31.3 Renewable energy**, insert the following text after the first paragraph (p. 121 of the Draft Plan):

"Hybrid renewables" consist of two or more renewable energy sources used together to provide increased system efficiency, as well as greater balance in energy supply, whilst optimising use of existing infrastructure. By developing hybrid renewables, plant consisting of wind, solar and battery exporting from common point of connection, but at different times, the need for transmission infrastructure is minimised and grid stability can be improved.

**CE-31-06** In **Chapter 31** insert the following additional energy policy:

**P-EN-8** Support proposals for hybrid energy systems and co-location of renewable energy infrastructure where it can be demonstrated that such developments will not have adverse impacts on the surrounding environment.”

## Issue 9 – Renewables-enabling plant

The ESB points out that, in the interest of energy security, the contribution from non-renewable sources will still consist of 20% by 2030. Furthermore, on dull still days or nights, almost all electricity may need to come from non-renewables generation. It will also be necessary to connect additional non-renewables plant (e.g. gas turbines) to the grid.

The submission suggests the inclusion of a “promotional objective” relating to renewables-enabling plant, worded as follows:

*“It must also be recognised that natural gas, renewable and indigenous gas, will continue to have a role to play in the transition to a low carbon economy. As such, renewable energy developments may require support from such sources in times of high energy demand.”*

## Response

The suggestion to include a reference and recognition of the role of gas is agreed. A short narrative should be added after the first paragraph in the beginning of Section 31.3, and a new policy, P-EN-9 should be added to the energy policies.

## Recommendation

**CE-31-10** In **Chapter 31, Section 31.3 Renewable energy**, insert the following text at the end of the narrative under the main heading (p. 121 of the Draft Plan):

It must be recognised that gas, particularly renewable and indigenous gas, will continue to have a role to play in the transition to a low carbon economy. As such, renewable energy developments may require support from such sources in times of high energy demand.

## Issue 10 – Community Benefit Fund

ESB indicates that “a key feature of the Renewable Electricity Support Scheme (RESS) is that all renewable electricity generation projects must establish a Community Benefit Fund”. The contribution is to be set at €2 per Megawatt hour of generation of the RESS Project.

The submission suggests that the Council should encourage “*renewables generation projects*” in locations where it wants to increase employment and income opportunities for local people.

### Response

It is considered that the energy policy P-EN-5 (“Collaborate with urban and rural communities in the development of community-level energy efficiency and renewable energy projects”) is sufficient in terms of involving local people in renewable energy developments.

**No change to the Draft Plan is required on foot of the above observation.**

## Issue 11 – EV charging points in car parking areas

ESB notes that the EU Energy Performance of Buildings Directive calls for an **increase to 20%** for the number of parking spaces which should have provision for electric vehicle charging infrastructure.

The submission requests that the standards set out in the Statutory Instrument No. 393/2021 – European Union (Energy Performance of Buildings) Regulations 2021 be considered for inclusion in the *Car Parking Standards*.

### Response

The suggestion is noted and agreed.

### Recommendation

**CE-33-21** In Section 33.9.7 **Car parking requirements** (Chapter 33, Volume 3 of the Draft Plan), insert an **additional table** as follows – *see next page*

**Table 33.11 EV charging point standards**

Development category	EV charging points
Residential multi-unit developments, both new buildings and buildings undergoing major renovations with private car spaces, including visitor car parking spaces	A minimum of <b>one</b> EV charge point space <b>per five</b> car parking spaces  Ducting for every parking space shall be provided
New dwellings with in-curtilage car parking	Installation of appropriate infrastructure to enable installation of recharging point for EVs
Non-residential developments with more than 10 private car parking spaces, including visitor car parking spaces (e.g. office buildings)	Provide at least <b>one recharging point</b> ; a minimum of <b>one space per five</b> car parking spaces should be equipped with one fully functional EV charging point
Developments with publicly accessible car parking spaces (e.g. supermarket, cinema etc.)	Provide at least <b>one recharging point</b> ; a minimum of <b>one space per five</b> car parking spaces should be equipped with one fully functional EV charging point

## Issue 12 – ESB Networks Depot at Cranmore Road, Sligo Town

ESB Networks Depot, at Cranmore Road, is ESB's primary Engineering Centre serving the North-West. Constructed in 1984, it provides offices for staff and accommodates services of strategic importance, including the Regional Engineering Centre serving hundreds of thousands commercial and domestic customers. Good access to the main road networks is essential to meet emergency response times for Sligo town and County.

The submission notes the proposed TC2 zoning (commercial and mixed uses) and considers its compatible with existing and possible future activities on site.

### Response

Noted. **No change to the Draft Plan is required on foot of this observation.**

## Submission 113

### Arts Council

<https://consult.sligococo.ie/en/submission/slg-c29-113>

The Arts Council, as prescribed authority under the Planning and Development Act 2000 (as amended), operates as an autonomous body under the aegis of the Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media. The mandatory requirement for addressing culture in the development plan is set out in Section 10(2)(b) of the Planning Act as follows: "*the integration of the planning and sustainable development of the area with the social, community and **cultural requirements** of the area and its population*".

The Arts Council's engagement by in spatial planning is based on its 10-year strategy '*Making Great Art Work 2016-2025*', on its spatial policy '*Place, Space & People*' (2020) and on its Architecture Policy '*Championing Architecture*', which promotes a high-quality architectural culture in Ireland. The Arts Council also has an extended remit under the Night-Time Economy Forum, seeking to support and encourage arts and cultural spaces to work together and facilitate more use of publicly owned cultural buildings and heritage sites for events extended into the evening time.

The submission welcomes the following elements of the Draft Plan:

- the approach advocated in Section 10.3 'Placemaking and public realm improvements' (Volume 2);
- the presentation of a profile for each designated town and specifically the identification of existing social infrastructure assets in each town.
- the reference in the Draft Plan to the 'Sligo Arts Plan 2022- 2025', the inclusion of the 'Town Centre First' policy, and the reference therein to the night-time economy task force and the consideration of meanwhile uses within the town centre.

Considering that "the Development Plan could benefit from a greater co-ordinated approach to the provision of arts and culture as part of the overall spatial development strategy for the County, for individual urban centres including particularly Sligo Town and from the provision of more goal orientated development policies and objectives", the Arts Council's submission contains several recommendations, which are addressed below.

### Issue 1 - Contribution of Arts and Culture to spatial planning and placemaking

The reference to arts and culture and its inherent value to the spatial planning for Sligo is set out in several different parts of the Development Plan, including Chapters 8, 10 and 27, with no concerted overview of the collective value of it to spatial planning.

The Arts Council requests the following:

- A. "a coherent core mandatory objective in the Development Plan which includes a requirement for; "*the integration of the planning and sustainable development of the area with the social, community and cultural requirements of the area and its population*" as per Section 10(2)(b) of The Planning and Development Act 2000 (as amended)."

- B. "policy and or objectives that elevate the strategic function and pursuit of 'Placemaking' in the spatial development strategy for Sligo" to be included in Section 5.3. Strategy for towns (Chapter 5 Settlement Strategy in Volume 1 Core Strategy) with the following wording:

**"5.3.3 Placemaking"**

*It is the policy of Sligo County Council to:*

- SP-S-11 (a) *Pursue the provision of 'placemaking'/civic-art' in the development/ redevelopment or expansion of urban centres throughout Sligo through the expectation of high quality architecture, urban and landscape design of the various physical elements of our environment that can positively influence our value, appreciation and interaction of it reflective of the National Policy on Architecture<sup>1</sup> and as per the recommendations set out in Chapter 10 of this Plan.*
- b) *Facilitate the provision and growth in the nighttime economy in Sligo town and in other appropriate urban centres consistent with the Report prepared by the Night-Time Economy taskforce where it can be achieved in balanced consideration with other land use activities and consistent with the objectives of Chapter 8 of this Plan."*

## Response

- A. The County Council is striving to achieve the culture-related mandatory objective specified in the Planning Act through the policies and objectives of the Draft Plan. It is neither necessary nor useful to reproduce *ad litteram* the wording of mandatory objectives listed in Section 10(2)(b) of the Planning Act.
- B. Having regard to the provisions of the *National Policy on Architecture* (SGLGH 2022), there is no objection to the inclusion of an additional on placemaking in urban centres in Chapter 5 Settlement Strategy, and a corresponding strategic settlement policy in the same chapter.

## Recommendations

- CE-05-02** In Chapter 5 Settlement Strategy, Section 5.3 Strategy for towns, insert an additional subsection 5.3.3 as follows:

### 5.3.3 Placemaking and the National Policy on Architecture

The National Policy on Architecture (DHLGH, 2022) seeks to support national and local architectural ambitions to deliver a high-quality built environment for everyone. It promotes quality and sustainability in the design and delivery of built environment plans, programmes and projects at national, regional and local level.

The policy envisages multidisciplinary collaboration, public engagement and community-led, co-design initiatives as "placemaking" practices to integrate new developments into town and village settings. It indicates that "Built environment and placemaking projects are conceived, designed, planned and delivered by architects working in multi-disciplinary teams".

The purpose is to see urban centres transformed into vibrant, inclusive and diverse living environments, where the growing population is aware of best architecture and placemaking practices and their importance to human health and well-being.

Sligo County Council will pursue placemaking in the development, redevelopment or expansion of the County's urban centres through the expectation of high-quality architecture, urban and landscape design that can positively influence people's appreciation and interaction with the physical elements of their environment, reflective of the National Policy on Architecture.

**CE-05-04** In **Chapter 5 Settlement Strategy**, insert an additional **Strategic settlement policy SP-S-3** under the heading “**Towns**” as follows (the subsequent strategic settlement policies for towns and villages shall be renumbered):

**SP-S-3** Improve the built environment in County Sligo's towns through “placemaking” by promoting high-quality architecture, urban and landscape design, in the interest of increased environmental, economic and social sustainability, as envisioned in the National Policy on Architecture.

## Issue 2 – Quality in architecture and urban design

The Arts Council requests that the introduction to Chapter 10 ‘Urban Design Principles’ (Volume 2), applicable to all settlements in County Sligo, should include the following additional bullet point:

- *quality in architecture and urban design to contribute toward place-making, wellbeing and healthy communities*

The above should be followed by corresponding details set out in a new subsection under Section 10.1 Urban regeneration:

### *10.1a Quality in Architecture and Urban Design toward Placemaking*

*In contributing to placemaking and quality of urban areas, new urban developments, streets and the amenity spaces will require high quality architectural, urban and landscape design interventions to demonstrate; its functionality; its appropriateness to its locational context and character; its contribution to the streetscape, townscape and ‘sense-of-place’, and its contribution to the creation of attractive, functional and comfortable places to live, work and visit consistent with the criteria set out in the Urban Design Manual and Development Management Standards set out in this Plan.*

## Response

The suggestions are noted and agreed.

## Recommendations

**CE-10-01** In the **introductory text to Chapter 10 Urban development principles**, insert an **additional bullet point** as follows:

- urban regeneration, with a focus on town centres;
- heritage-led regeneration including the maintenance of the character of historic streetscapes;
- place-making and public realm improvements;
- **quality in architecture and urban design to contribute toward place-making, wellbeing and healthy communities;**
- the compact growth of urban areas;
- strategic designations and zoning objectives

**CE-10-03** In Chapter 10 Urban design principles, insert a new subsection 10.1.3 as follows:

### **10.1.3 Placemaking through quality in architecture and urban design**

The pursuit of 'placemaking' in urban areas will require high-quality architectural, urban and landscape design interventions. New developments should demonstrate not only functionality, but also appropriateness to locational context and character, and positive contribution to the streetscape, townscape and 'sense-of-place', consistent with the criteria set out in the Urban Design Manual (DEHLG, 2009).

## **Issue 3 – “Future proofing” the requirements of the Planning and Development Bill 2023**

The submissions indicates that Section 48 of the Bill requires the “Preparation of a strategy relating to places of high quality and sustainable communities for the functional area of the planning authority”.

Pursuant to the above, The Arts Council would welcome the provision of an additional objective in ‘Chapter 27 Community and social infrastructure’ as follows:

*P-CF-7 During the lifetime of the Plan, the Council will prepare a strategy for the creation, improvement and preservation of places of high quality and sustainable communities for the functional area of the planning authority, and which shall provide for;*

*(a) the provision, improvement, extension and preservation of amenities, facilities and services to meet the social, community, recreational and cultural requirements of the area, including the needs of children, the elderly and persons with disabilities;*

*(b) the protection of the linguistic and cultural heritage, including the protection of Irish as the community language, of Gaeltacht areas in the functional area to which the development plan relates;*

*(c) the promotion of high standards of urban design, architecture, public realm and landscaping to enhance, improve and maintain the quality and character of urban and rural areas.*

*Further to the findings of such strategy, the Council shall review the provisions of policies P-CF-1 to P-CF-6 (‘Community Facilities’ policies) and policy P-AC-1 (‘Arts and cultural facilities’ policies) to ensure those policies are sufficiently responsive to the requirements of S48 of the Planning and Development Bill 2023” and the provision of an appropriate level of community, arts and cultural facilities during the plan period”.*

## **Response**

At the time of drafting this Report, there were 1,194 amendments proposed to the Planning and Development Bill 2023. The 2023 Planning Bill may change substantially before it is promulgated.

The forthcoming Planning Act will specify the requirements and timeframes for the review or variation of development plans. In the interim period, it would be inappropriate to amend the Draft Plan on the basis of the 2023 Bill.

**No change to the Draft Plan is required on foot of the above.**

## Issue 4 – Synergy with Arts plans and strategies

In addition to the reference of the Sligo Arts Strategy 202-2025, the Arts Council would welcome greater synergy with the spatial development priorities set out in the Sligo Culture & Creativity Strategy 2023-2027 which sets out an express priority in '**Strategic Priority 1: Creative Spaces**':

*“to support placemaking and revitalising our town centres which will be delivered through the following actions:*

- *Harness the potential of culture and creativity to re-imagine and revitalise our town centres and spaces as creative spaces making them attractive places to live, work and visit.*
- *Develop the role of the culture and creative sector in supporting the nighttime economy and creating safe places for people to socialise, meet and enjoy.”*

The submission suggests an additional policy in **Chapter 27 'Community and Social Infrastructure'** as follows (or similar):

*“Plans for Regeneration, renewal of urban areas or for town centre revitalisation shall harness the potential of culture and creativity opportunities and provision for the night-time economy where appropriate, to contribute to re-imagination and revitalisation of those areas making them attractive places to live, work and visit.”*

### Response

The suggestion is noted and agreed in principle. The narrative immediately under the heading **27.4 Arts and cultural facilities** should be expanded to include text similar to the above.

### Recommendation

**CE-27-04** After the first paragraph in **Section 27.4 Arts and cultural facilities**, insert the following text:

*When preparing schemes for urban regeneration or for town centre revitalisation, the Council will harness the potential of culture and creativity to contribute to reimagining those places, thus making them more attractive.*

## Issue 5 – Effective policy

Whilst **Arts and cultural facilities policy P-AC-1** in the Draft Plan seeks to *“Encourage and assist in the development of the arts and to support the ongoing development of cultural infrastructure throughout the County”*, it is difficult to envisage the effectiveness of this policy or how its success (or otherwise), could be evaluated during the lifetime of the Plan.

The Arts Council would welcome a review of policy P-AC-1 or the provision of a specific objective(s) for the provision of arts and cultural facilities throughout Sligo which are evidence-based, measurable, and which include clarity of responsibility for delivery – whether it is to be delivered by the local authority, in partnership with other departments/agencies, or anticipated as part of private development projects. Such measures could be based on **Cultural Infrastructural Audits**, which would include analysis of:

- existing provision and typology type of arts and cultural infrastructure including buildings, places and spaces and their spatial relationship to existing communities or areas planned for growth, and,
- their individual or collective value which contribute to the provision Arts and Culture; and,

- the identification of under-utilisation of civic buildings/spaces in urban centres which have the potential for future arts and cultural uses or the meanwhile uses as referenced in **Town Centre First Policy TCF-5** of Volume 2 of the Development Plan.

## Response

The suggestion is noted. The Development Plan Guidelines indicate that it is good practice to ensure that application for significant residential developments are accompanied by a community infrastructure audit. However, there is no requirement to carry out such audits in the context of development plans.

It is considered that area-based Cultural Infrastructure Audits would be more appropriately undertaken in the context of future residential and community developments in Sligo Town Local or – in the case of lower-tier towns - as part of non-statutory schemes such as Town Centre First Plans.

**No change to the Draft CDP is recommended on foot of this observation.**

## Issue 6 – High-quality design

In addition to design standards applicable to housing developments, the Development Management provisions should set out a requirement for high quality architectural and urban design solutions in all urban developments of scale, “which seeks to champion high quality architectural culture which demonstrate through design statement; its functionality; its appropriateness to its locational context and character; how it will contribute to the streetscape, townscape and ‘sense-of-place’, and its contribution to the creation of attractive, functional and comfortable places to live, work and visit consistent with the criteria set out in the Urban Design Manual”,

## Response

The concept of “high-quality architectural and urban design” is difficult to translate into specific standards for the use of prospective applicants seeking to build residential or mixed-use developments.

Section 33.3 Residential development in urban areas (Chapter 33 of the Draft Plan) sets out the list of documents which have informed the standards contained in the section.

It is clearly indicated that the respective documents – which contain detailed design guidance for housing, urban design, urban roads and streets – will be used in the assessment of planning applications for residential and mixed-use developments.

**No change to Chapter 33 of the Draft Plan is recommended on foot of this observation.**

## Issue 7 – Planning for the night-time economy

The policy framework for **Sligo Town – Primary Retail Centre** (Section 8.4, Volume 1) and **Chapter 11. Sligo Town** (Volume 2) should include “express objectives to support provision and growth of the night-time economy to facilitate enhanced provision of diverse social, cultural and economic activities in the evening time, of appropriate character, scale and location – reflective of the recommendations set out in the *Night-time economy task force report*.”

This approach which could include any number of the following objectives, and could inform also the preparation and implementation of various masterplans and the forthcoming Sligo Local Area Plan (referenced in Section 11.1 of Volume 2):

- 1. Consultation with relevant interests (including the Minister, relevant property owners, Sligo Chamber of Commerce, Retail Excellence Ireland and public transport operators as appropriate) to examine opportunities and constraints in terms of spatial location and accessibility in the evening time.*
- 2. The designation of zones which are suitable to facilitate a concentrated programme of evening time arts and cultural and leisure activities. The purpose of such designation would be to emphasis the character of and contribution of these areas to provision of the Arts and Culture and to the local economy and to consider measures that might be necessary to protect, provide and enhance provision and co-existence of mutually dependant cultural activities with other land use activities.*
- 3. Inclusion in the Development Plan of appropriate policy safeguards to preserve the integrity of the town centre that:*
  - i. favourably support uses that strengthen and enhance the night-time economy, through provision of diverse social, cultural and leisure activities within suitably identified areas, and subject to normal planning considerations.*
  - ii. Support specific night-time uses subject to qualitative assessment through the 'Development Management function' in order to consider: the effects of such use on the vitality and viability of the retail core; potential effects arising from proliferation or clustering of similar night-time activities on the quality and character of the streetscape; and potential for adverse environmental nuisances such as noise, odour, vibration, lighting, accessibility and safety and appropriate mitigation.*

## **Response**

The suggestions made under items (1) and (2) are more appropriate to the preparation of a Local Area Plan for Sligo Town, rather than the County Development Plan. Consultation with relevant authorities, communities and private stakeholders will be carried out, as required by Planning legislation. The designation of zones suitable for “night-time economy” developments will be done following such consultations.

It is not clear what is requested from the County Council under items 3(i) and 3(ii). The assessment of all planning applications, as part of the development management process, normally takes into account all the listed considerations.

The Draft County Development Plan sets a general framework for Sligo Town through Core Strategy objectives for the Regional Growth Centre (Chapter 4), zoning and further strategic objectives (Chapter 11). The integrity of Sligo Town Centre is not endangered in any way.

**No change to the Draft CDP is recommended on foot of this observation.**

## Issue 8 – Planning for the Artist

The Development Plan should include a policy to support “provision of artist live-work space” for those formally engaged in the Arts and Culture industries.

Such policy could be provided through the spatial designation of creative hubs for artists or the designation of ‘cultural quarters’ within town where policy supports the temporary use of vacant buildings and properties for arts and cultural purposes such as that advocated in Policy P-AC-5. Policy P-AC-5 could be amended as follows to provide for this:

*“P-AC-5 Facilitate the use of vacant or unused Council premises (i.e. land and buildings) for exhibitions, performances and other uses related to community arts, **including provision for artist live-work spaces** where appropriate”.*

### Response

There is no objection to the proposed amendment to the Arts and cultural facilities policy P-AC-5, in combination with the amendment recommended in response to Failte Ireland’s Submission 194/Issue 11.

### Recommendation

**CE-27-05** In **Chapter 27**, amend the **Arts and cultural facilities policy P-AC-5** as follows (including the additional wording in response to Submission 194/Issue 11):

**P-AC-5** Facilitate the use of vacant or unused Council premises (i.e. land and buildings) for exhibitions, performances and other uses related to community arts, **including provision for artist live-work spaces, as well as tourism-related uses**, where appropriate.

## Issue 9 – Use of development contributions to deliver Arts and Culture

Sligo County Council should consider, as part of the preparation of its ‘Development Contribution scheme’, the application of Section 48(1) ‘Development Contributions’ and/or the use of Section 48(2)(c) ‘Special Development Contributions’ in certain specific instances which may facilitate or enable the provision of public art, formal or informal Arts and Culture activity, or improve the quality of the physical environment that can enable such activities to occur successfully such as roads, streets and civic-spaces, streets pursuant to the outcome of the needs assessment prepared to inform arts and cultural policy objectives.

### Response

The content of the next/revised Development Contribution Scheme is not a matter for the County Development Plan.

**No change to the Draft Plan is required.**

## Submission 119

### Uisce Éireann (UÉ)

<https://consult.sligococo.ie/en/submission/slg-c29-119>

Uisce Éireann welcomes the Draft Plan, which includes policies and objectives supporting the delivery of UÉ plans, programmes and policies, and the sustainable management of water and wastewater in line with national and regional objectives as stated in the National Planning Framework, e.g. NPO63, and the Regional Economic Spatial Strategy (RSES) for the Northern and Western Region.

The submission is highly informative and contains a wealth of details, which can be read in full on the Council's Consultation Portal (see link above). In addition to comments and suggestions on the Draft Plan, the submission includes tables containing updates on water and wastewater infrastructure, as well as background information on the state-owned company.

The summary and responses provided below relate mainly to Development Plan policy and objectives, without including the large amount of specific details provided by UÉ.

#### Issue 1 – Water infrastructure capacity

UÉ indicates that the tables accompanying the submission “provide an overview of the ability of Uisce Éireann to cater for the 2024-2030 population and housing allocations in the settlements listed in the Core Strategy Table”.

#### Response

The information is noted. The tables confirm that, in general, there is adequate capacity to provide potable water and to treat wastewater associated with the envisaged population increase. Where capacity is constrained, there are ongoing projects to improve provision.

**No change to the Draft Plan is required.**

#### Issue 2 – Alignment between population targets and housing allocations

The submission notes “a variance between the projected population growth and the potential population increase arising from the housing allocations and yields”. It indicates that “in Sligo town, an increase of 3,192 persons is targeted to 2030, whereas the housing allocations and yield are 2,512 and 2,952 units with an equivalent potential population increase of 7,380 persons (ref. 11.4 of the Draft Plan), more than double the targeted population increase and in excess of the 2031 RSES targets”

UÉ suggests “greater alignment between the population and housing allocation/ yield figures” to assist in forward planning for future infrastructure needs.

## Response

The housing allocation for Sligo Town has been derived from the total County allocation, which was calculated in accordance with the 2020 Housing Supply Target Methodology for Development Planning (Section 28 guidelines). The population target, on the other hand, is dictated by the RSES target for the Regional Growth Centre. The two figures are not related in any way.

Section 3.3.1 Notes on the Core Strategy Table states that “There is no correlation between the population allocations and the housing allocations, because the HST figure is an “adjusted total housing demand”, which takes into account the undersupply of housing since 2017, and factors in a degree of “convergence to NPF strategy”.

It should be noted that the housing allocation does not correspond to an envisaged net increase in the number of households either, as it makes allowance for the replacement of obsolete dwellings and for homes needed by existing “hidden” households (i.e. people living in multi-household dwellings, who would prefer to live in single-household units).

Section 5.2.3 of the Draft Plan (Population and housing allocations at local level) again indicates that the figures derived from the NPF population projections and the RSES population and housing targets are not correlated with the HST housing figure as calculated in Table 5.2.

It is expected that the forthcoming review of the NPF and RSES will provide better alignment of housing and population allocations for the County and for Sligo Town.

**No change to the Draft Plan is required.**

## Issue 3 – Zoning Matrix

UÉ suggests that water services infrastructure should be included in the zoning matrix in Chapter 10 as 'normally permitted' or 'open to consideration' across all Land Uses, “in order to provide and operate the public water services necessary to achieve the objectives of this Plan”.

The submission requests that sufficient provision be made in the Plan to allow for the necessary delivery of water services infrastructure in unzoned areas.

## Response

Existing water and wastewater treatment plants are located both within settlement development limits, in areas zoned TU (transport and utilities infrastructure), and outside zoned lands, in rural areas. The provision of further water services infrastructure is not dependent on zoning objectives. In fact, such service infrastructure must be present (or planned to be delivered within a 6-year timeframe) before any lands can be zoned.

**No change is required to the Zoning Matrix.**

## Issue 4 – Network reinforcements

UÉ indicates that network reinforcements (extensions, upgrades) may be required to service some zoned sites, depending on the location and scale of development. Generally, development in strategic residential reserve lands will require a greater level of upgrades. Where network reinforcements are required, these shall be developer driven, unless there are committed UÉ projects in place to progress such works.

## Response

The information is noted. **No change to the Draft Plan is required on foot of the above.**

## Issue 5 – UÉ assets

Uisce Éireann assets, some located on zoned lands, must be protected or diverted. Where assets need to be altered or diverted to enable a proposed development, a diversion agreement may be required. Further information on this process and minimum separation distances is available at:

<https://www.water.ie/connections/developer-services/diversions/>. Greater separation distances apply for development in the vicinity of trunk sewers and watermains and this may be relevant to a number of sites e.g. Sligo Infrastructure Assessment site (IA)1, IA15. Separation distances in relation to pumping stations are available in UÉ Codes of Practise.

## Response

The information is noted. Any potential issues relating to separation distances between UÉ assets and any proposed development on the site IA15 (adjoining the eastern side of the N-15 in the northern part of Sligo Town) will be addressed at pre-application stage.

**No change to the Draft Plan is required on foot of the above.**

## Issue 5 - Sligo Town wastewater infrastructure

The submission indicates the following:

- In the Magheraboy area there are trunk sewers, but there are also potential constraints. Stormwater separation will be required to free up capacity for development. Localised network reinforcement, on-site extensions and third-party permissions may be required to service sites in this area. Master-planning is recommended.
- Sites IA22 and IA23 (in the Caltragh area) may require significant road/rail crossings to service.
- The recent connection of Bundoran Road WWPS to the Ballast Quay network has freed up capacity in the Cartron catchment in Sligo Town, but constraints remain, including along Markievicz Road.
- GIS available to UÉ is poor, but anecdotal evidence indicates there is sewer network in the vicinity of IA2, IA14 and IA8. Network connectivity should be confirmed with local knowledge.
- Onsite water and sewer network extensions would be required to service the full extent of BIE lands to the north-east and at Oakfield. Localised upgrades may also be required.
- The preparation of a Drainage Area Plan for the Sligo Town agglomeration is underway. This plan will identify constraints and inform solutions.

## Response

The information is noted and will be taken into consideration as part of the preparation of the Sligo Town LAP and any masterplans that may include the areas mentioned in the UÉ submission.

**No change to the Draft Plan is required on foot of the above.**

## Issue 6 – Wastewater infrastructure in towns and villages

The submission indicates the following:

### **Ballymote**

- The pipe size is unknown across much of the sewer network. Localised upgrades may be required.
- There are known lengths of the water network that are older mains infrastructure in Ballymote, including cast-iron pipework. These may require upgrades to facilitate development.
- The likely connection for site IA1 is via the private network in the adjacent estate. Third-party permissions may be required.

### **Enniscrone**

- A sewer extension of 100-200m may be required to serve sites IA8, IA6.
- The trunk sewer through site IA5 needs to be protected.

### **Tobercurry**

- The pipe size is unknown across much of the sewer network. Localised upgrades may be required.
- A reservoir is within site IA8. On-site boosting may be required for site IA6 and IA8.

### **Ballysadare**

- The available sewer network GIS data is limited; localised upgrades may be required.
- Much of the sewer network is within private lands.
- Extensions and upgrades likely to be required to service sites 5, 6, 8, with third-party permissions. Longer extensions may be required to avoid third party lands.

### **Collooney, Coolaney-Rockfield, Grange, Easky**

- The available sewer network GIS data is limited; localised upgrades/ extensions may be required, depending on extent of development.

### **Mullaghmore**

- This village has no wastewater treatment capacity at present. UÉ welcomes the restriction on multi-unit housing developments. It should be noted that connection to the network will be subject to a connection agreement and the completion of the WWTP project.

## **Response**

The information is noted. Any potential issues relating to UÉ infrastructure and any proposed development on the sites mentioned above will be addressed at pre-application stage.

**No change to the Draft Plan is required on foot of the above.**

## Issue 7 – Locations of wastewater treatment plants

In several villages e.g. Cliffony, Bunnanadan, Ballymote, the WWTP is within the green-belt zoning rather than the TU zoning. Several zoned sites with potential for the development of sensitive receptors e.g. residential dwellings, are in the vicinity of WWTPs e.g. Enniscrone IA7, Ballysadare IA4, and Tobercurry IA9. Cognisance should be had to the established use of the existing wastewater treatment plant and the potential for extensions/ intensification of use of the WWTP in the future.

### Response

The information is noted. **No change to the Draft Plan is required.**

## Issue 8 – Efficient provision of service infrastructure

There are several large landbanks in Sligo's towns and villages that would benefit from masterplanning, so that sequential connections to water supply and wastewater infrastructure can be undertaken in the most efficient manner. These include IA Sites 2 and 24 and the Magheraboy lands in Sligo Town, Site 10 in Enniscrone, sites 5, 6, 7, 8 in Ballysadare, site 8 in Collooney.

### Response

Section 10.4 Compact growth (In Chapter 20 Urban development principles, Volume 2) indicates that comprehensive masterplanning will be required for development on large greenfield, brownfield and backland sites. Any issue relating to connections to water supply and wastewater infrastructure will be addressed during the preparation of such masterplans.

**No change to the Draft Plan is required.**

## Issue 9 – Water supply infrastructure

The submission indicates the following:

- Sligo Town is supplied by Foxes Den and Kilsellagh Water Treatment Plants (WTPs). It is anticipated that there will be adequate capacity to meet the projected increase in population for Sligo Town by 2030, as outlined in the draft Core Strategy. However, a further upgrade at Foxes Den WTP may be required in the longer term, to accommodate the RSES targeted population increase of 8,000 persons by 2040.
- At Lough Talt, a new interim WTP was recently commissioned in 2020 and will meet the needs for the short-medium term. An alternative long-term supply for the area is required and a feasibility study / options assessment has been undertaken and a preferred solution is at detailed design.
- New groundwater sources are being investigated at North Sligo RWS to increase supply and provide sufficient resilience within the lifetime of the Draft Plan.
- In addition, minor WTP upgrades are continually being progressed on a nationally prioritised basis.
- Mains rehabilitation works have been carried out in recent years on distribution and trunk mains throughout the county, including in Sligo Town and at Lough Talt Water Rsource Zone(WRZ). Further extensive rehabilitation works are ongoing or planned on the outskirts of Sligo Town.

- In recent years, Uisce Éireann has worked with Sligo County Council to provide a watermain along the new Western Distributor Road to facilitate planned growth in the area.
- Modelling is being undertaken for Lough Talt WRZ, Sligo Town WRZ and South Sligo WR, to identify issues and find solutions where required.

## Response

The information is noted. **No change to the Draft Plan is required.**

## Issue 10 – Sustainable drainage systems

Uisce Éireann welcomes the inclusion of objectives and initiatives supporting the implementation of Sustainable Urban Drainage Systems (SuDS) in new developments, including the public realm.

These measures can provide a cost effective and sustainable means of managing stormwater and water pollution at source, keeping surface water out of combined sewers while providing environmental benefits. The removal of stormwater from combined sewers increases the capacity for foul drainage from new developments, which is particularly relevant for the achievement of compact growth objectives.

## Response

The positive comments are noted. **No change to the Draft Plan is required.**

## Issue 11 - Planned road and public realm projects

Planned public realm and transport projects - such as tree planting, building over assets, new connections, stormwater separation, upgrade works in advance of road project - have the potential to impact on Uisce Éireann assets.

Early engagement in relation to planned road and public realm projects is requested to ensure public water services are protected, enable Uisce Éireann to plan works accordingly and ultimately minimise disruption to the public.

## Response

The comments are noted. The above are operational matters, which **do not require any change to the Draft Plan.**

## Issue 12 – Sligo RGC strategic objective for water infrastructure

Wastewater treatment infrastructure is referenced in section 4.4 as being mentioned in the RSES as existing or envisaged strategic infrastructure for the Regional Growth Centre. However, this has not been carried forward into a specific Strategic Objective within the Draft Plan.

A strategic objective supporting the provision of the necessary water services to realise the development objectives of the Draft Plan would be welcomed.

## Response

The suggestion is agreed.

## Recommendation

**CE-04-02** In **Chapter 4, Section 4.4 Strategic infrastructure**, include an **additional SO-RGC-9**, under the sub-heading **Water infrastructure**, as follows:

### Water infrastructure

**SO-RGC-9** In co-operation with Uisce Éireann, pursue the provision of the water service infrastructure upgrades and expansion necessary to support the planned development of Sligo Regional Growth Centre.

## Issue 13 – Development on unserviced lands

Uisce Éireann currently has no remit in the provision of new infrastructure to unsewered settlements. As noted in the Draft Plan, the DHLGH is progressing the Measure A8 scheme targeting the wastewater collection and treatment needs of villages and settlements without access to public wastewater services. Should Sligo County Council be successful in the bid to include Ballygawley and Rathcormac in this programme, or otherwise receive funding, Uisce Éireann will work with the DHLGH and the Local Authority to support the development and implementation of an appropriate solution for these villages. The submission suggests the following amendment to text in section 5.4.4 and Chapter 53:

*Sligo County Council, in co-operation with **DHLGH**...~~Uisce Éireann~~*

## Response

The suggested inclusion of DHLGH in the text is agreed, but UÉ should not be excluded.

## Recommendations

**CE-05-03** In **Section 5.4.4 Unserviced villages** (Chapter 5 Settlement Strategy, Volume 1), modify the second sentence as follows:

Sligo County Council, in co-operation with **DHLGH and Uisce Éireann**, **as appropriate**, will pursue the provision of wastewater treatment facilities to serve these villages.

**CE-53-01** In **Chapter 53 Unserviced villages** (Volume 4), modify the last sentence as follows:

Sligo County Council, in co-operation with **DHLGH and Uisce Éireann**, **as appropriate**, will pursue the provision of wastewater treatment facilities to serve these villages.

## Issue 14 – SUDs in public realm projects

In Section 10.3.2 Public realm improvement schemes, UÉ would welcome the inclusion of text/ objectives requiring the use of nature-based sustainable drainage solutions in public realm projects.

### Response

The provisions of Section 30.3 (Surface water drainage) and the corresponding policies in Chapter 30 are applicable to all development proposals, including public realm projects.

**No specific additional objective is necessary in Section 10.3.2.**

## Issue 15 – Collooney water supply

The submission notes that the Village Assets table in Chapter 16 Collooney Village Plan should be amended to indicate that Collooney is supplied by Sligo Town and Environs.

### Response

The observation is noted.

### Recommendation

**CE-16-01** Amend the **Village Assets table** in **Section 16.1** as follows:

**Water supply** Sourced from **Lough Gill through** the Sligo **Town** and Environs Water Supply

## Issue 16 – Development in riparian zones

With regard to the provisions on development in riparian zones, contained in Section 24.5 Inland waters, Uisce Éireann seeks confirmation that necessary upgrades to existing or potential new water supply or water treatment infrastructure could be considered appropriate in accordance with policy P-INW-1, and other relevant provisions in the Draft Plan, where a need for such a location can be demonstrated as necessary.

A similar confirmation is sought in relation to policy P-WQ-6 in Section 24.6 Water quality.

### Response

All development proposals in ecologically sensitive areas – such as riparian zones – will be assessed on their merits and on the basis of the relevant Plan policies. No exceptional provision is necessary for upgrades to existing infrastructure or potential new water supply and wastewater treatment infrastructure.

**No change to the Draft Plan is required.**

## Issue 17 – Water quality and water body status

With regard to policy P-WQ-4 in Section 24.6 Water quality, the submission suggests the following amendment:

*P-WQ-4 Prohibit any development which is likely to lead to the deterioration of water ~~quality~~ body status.*

### Response

It is agreed to insert additional wording to clarify the Water quality policy P-WQ-4.

### Recommendation

**CE-24-01** In **Section 24.6 Water quality** (Chapter 24 Natural heritage), amend the **Water quality policy P-WQ-4** as follows:

**P-WQ-4** Prohibit any development which is likely to lead to the deterioration of **the status of any water body** (water quality).

## Issue 18 – Water supply and holiday homes

UÉ suggests the following amendment to P-HHD-1 (Chapter 26 Residential development, Volume 3):

*Direct proposals for multi-unit holiday home developments into existing serviced settlements, particularly those with special coastal tourism functions subject to adequate wastewater treatment **and water supply** capacity.*

### Response

The suggestion is agreed.

### Recommendation

**CE-26-10** In **Section 26.5 Miscellaneous housing provisions**, amend the **Holiday home development policy P-HHD-1** as follows:

**P-HHD-1** Direct proposals for multi-unit holiday home developments into existing serviced settlements, particularly those with special coastal tourism functions subject to adequate wastewater treatment **and water supply** capacity.

## Issue 19 – water services capacity and new connections

The submission makes the following points:

- UÉ has no current plans to extend the wastewater network to lands at Carrowroe and Belladrehid, formerly zoned “WILT” (waste management, industry, logistics and transport-related activities). Any proposed connection to the Sligo town sewer network would be developer-led and subject to the Connections Charging Policy.

- Development associated with extractive industries, renewable energy, marine and coastal developments, peat extraction, aquaculture, forestry, tourism etc must have due regard for, and not adversely impact, existing, planned or reasonably foreseeable water sources or Uisce Éireann infrastructure. Uisce Éireann will engage via the planning process for such developments in its role as statutory consultee.
- With regard to the proposed Signature Discovery Point at Mullaghmore Head, it should be noted that there is no spare wastewater treatment capacity available at this time. A project to provide capacity is at concept design stage.
- Uisce Éireann welcomes the policy requiring masterplans for backland developments (policy P-CG-3 in Chapter 10 Urban development principles)
- Uisce Éireann welcomes the inclusion of policy P-SLR-3 in Chapter 10 (Urban development principles) insofar as it requires land within the Strategic Land Reserve to demonstrate that it is fully serviced prior to being brought forward for residential development.
- the completion of Mullaghmore WWTP project (Chapter 21 Mullaghmore Village Plan) is subject to the necessary funding and governance approvals, as well as statutory consents, and may extend beyond the Draft Plan period.

## Response

The information and positive comments are noted.

**No changes to the Draft Plan are required on foot of the above.**

## Issue 20 – responsibility for delivery of water services

The submission notes that over the course of 2023, Uisce Éireann assumed full responsibility for the delivery of all public water services in Ireland, including in Sligo. It is suggested to delete the following statement from the introductory section to Chapter 30 (Water infrastructure):

*Sligo County Council retains its role in facilitating the provision of adequate water services at a local level, through Service Level Agreements (SLAs).*

## Response

The observation is noted and agreed.

## Recommendation

**CE-30-01** In the **introductory text to Chapter 30 Water Infrastructure**, amend the third paragraph as follows:

Irish Water, the regulatory body for water in Ireland, became known as Uisce Éireann in January 2023, and assumed full responsibility for the delivery of public water services in Ireland, including Sligo, over the course of the same year. Uisce Éireann (UÉ) is responsible for the operation of all public water and wastewater services including management and maintenance of water and wastewater assets, planning and investment in new projects. **Sligo County Council retains its role in facilitating the provision of adequate water services at a local level, through Service Level Agreements (SLAs).**

## Issue 21 – National Water Resources and Drinking Water Safety Plans

The submission suggest the inclusion in Section 30.1 Water supply of references and policies supporting UÉ in the development and implementation of Drinking Water Safety Plans and of the National Water Resources Plan for Ireland.

### Response

The development and implementation of Drinking Water Safety Plans and the National Water Resources Plan are obviously the exclusive responsibilities of UÉ, which **do not require any changes to the Draft Plan**.

## Issue 22 – Kilsellagh Water Treatment Plant (WTP)

Upgrade works carried out at Kilsellagh WTP in 2023 improved the WTP performance and Level of Service provided.

### Response

The information is noted. The text in Section 30.1.1 Water supply for Sligo Town should be updated.

### Recommendation

**CE-30-02** In Section 30.1.1 Water supply for Sligo Town, modify the last sentence of the first paragraph as follows:

Upgrade works carried out at Kilsellagh WTP in 2023 **resolved capacity issues improved the plant's performance and the level of service provided.**

## Issue 23 – Table 30.1 Water supply schemes in County Sligo

The submission requests that Table 30.1 is either removed or updated prior to Plan adoption, because “figures such as the average daily production and spare capacity continually change”.

### Response

Table 30.1 (Water supply schemes in County Sligo) provides details that support and justify the Core Strategy allocation of housing and population to the County's settlements. All figures were provided by UÉ and were correct at the time of preparing the Draft Plan. While it is accepted that figures are continually changing (including population and housing figures), Table 30.1 represents a 2023 “snapshot”, which may provide a useful baseline for the mid-term and end-term reviews of the Draft Plan.

It is agreed that Table 30.1 should be updated based on UÉ -confirmed information prior to adoption of the Plan.

### Recommendation

**CE-30-03** In Chapter 30 Water infrastructure, update Table 30.1 Water supply schemes in County Sligo before the publication of the final Sligo CDP 2024-2030, using figures confirmed by Uisce Éireann.

## Issue 24 – Water supply policy P-WS-1

The submission suggests the following amendments to P-WS-1:

*Co-operate with Uisce Éireann to maximise the potential of existing capacity and to identify and facilitate the timely delivery of new water services infrastructure required to realise the development objectives and in order to support population and economic growth as set out in the Core Strategy of this Plan.*

### Response

Agreed, the policy should be amended as requested.

### Recommendation

**CE-30-04** In Chapter 30 Water infrastructure, amend the Water supply policy P-WS-1 as follows:

**P-WS-1** Co-operate with Uisce Éireann to maximise the potential of existing capacity and to identify and facilitate the timely delivery of new water services infrastructure required to realise the development objectives and in order to support population and economic growth as set out in the Core Strategy of this Plan.

## Issue 26 - Small Towns and Villages Growth Programme

In relation to the STVGP, UÉ makes suggests the following amendments:

*In 2020 Sligo County Council's Water Services Section nominated, and ranked in order of priority, the villages of Cliffony, Mullaghmore, Castlebaldwin, Geevagh and Ballintogher for inclusion in the programme. Geevagh was not included in UÉ's final ranking of candidate settlements as it did not meet the qualifying criteria.*

*Strategic assessments of the treatment plants in the highest-ranked nominated settlements have been carried out and Mullaghmore has progressed to Stage 2/concept design. The provision of a new WWTP to serve Mullaghmore will be included in Uisce Éireann's CIP 2025–2029, subject to regulatory approval.*

*.....proposals for new or upgraded WWTPs in small villages. In 2023, further consultation was undertaken with local authorities, and two further villages, Ballysadare and Culfadda, were added to the list of candidates in the programme in county Sligo.*

UÉ further notes that Geevagh is not included in the STVGP. Although the village was nominated by Sligo County Council, it did not meet the qualification criteria for inclusion in the STVGP.

It is also requested that the paragraph relating to the Measure A8 scheme, unrelated to the STVGP, is moved to a separate section to avoid confusion, and that the following amendment is made to the corresponding text:

*In 2022, Sligo County Council submitted two applications to the DHLGH, under ..... two villages be included in this programme, Uisce Éireann will, through the Connections process, work with the DHLGH...*

### Response

The corrections clarifications and suggestions are noted and agreed.

## Recommendation

**CE-30-05** In Chapter 30 Water infrastructure, amend Section 30.2.3 as follows:

### 30.2.3 Schemes and measures for small Towns and villages Growth Programme (STVGP)

#### Small Towns and Villages Growth Programme (STVGP)

Uisce Éireann co-operates with local authorities and local communities to upgrade WWTPs or provide new plants under the Small Towns and Villages Growth Programme (STVGP), which is a component of UÉ's Capital Investment Programme.

In 2020 Sligo County Council's Water Services Section nominated, and ranked in order of priority, the villages of Cliffony, Mullaghmore, Castlebaldwin, Geevagh and Ballintogher for inclusion in the programme. Geevagh was not included in UÉ's final ranking of candidate settlements as it did not meet the qualifying criteria.

Strategic assessments of the treatment plants in the treatment plants in the highest-ranked nominated settlements have been carried out and Mullaghmore has progressed to Stage 2/concept design. The provision of a new WWTP to serve Mullaghmore will be included in Uisce Éireann's CIP 2025–2029, subject to regulatory approval.

#### Measure A8

In 2022, Sligo County Council submitted two applications to the DHLGH, under Measure A8 of Circular L1-22 'Wastewater Collection and Treatment needs for Villages and Settlements without access to Public Wastewater Services'. The settlements nominated were Ballygawley and Rathcormac. Should the two villages be included in this programme, Uisce Éireann will work with the DHLGH and the Council, through the Connections process, to support the development and implementation of an appropriate wastewater treatment solution for each village.

A number of investment cycles will be required to address all candidates in the STVGP. UÉ plans to continue this programme into the investment period 2025-2029, and Sligo County Council will submit further proposals for new or upgraded WWTPs in small villages.

## Issue 27 – Table 30.2 Wastewater treatment plants in County Sligo

UÉ would prefer the columns for Current loading PE\* and Available PE\* to be removed from the table (as these are updated on an annual basis and so will change within the lifetime of the draft Plan), or that Red / Amber / Green status is used (as included in the most recent capacity register issued, with appropriate caveats), which is less likely to change year to year.

If the figures are to be retained, UÉ would seek that they are confirmed with Uisce Éireann prior to adoption of the Plan. The following amendments are suggested for the Comments column:

*Ballincar- Residents of Ballincar ~~will~~ may be able to connect to the upgrade to the Rosses Point Sewerage Scheme\*, which will pump wastewater to the Teesan pumping station and onwards to Sligo Waste Water Treatment Plant\*\*\*\*\* where spare capacity is available. Connections to the network will be subject to feasibility assessment, via our New Connections process, and UÉ's Connections Charging Policy.*

*Sligo Town- There is potential capacity to upgrade the plant to 75,000 PE.*

In addition, UÉ recommends the updating of WWTP available capacity information in the towns and villages profiles.

## Response

Table 30.2 (Wastewater treatment plants in County Sligo) provides details that support and justify the Core Strategy allocation of housing and population to the County's settlements. All figures were provided by UÉ and were correct at the time of preparing the Draft Plan. While it is accepted that figures may change, Table 30.2 represents a 2023 "snapshot", which may provide a useful baseline for the mid-term and end-term reviews of the Draft Plan.

It is agreed that Table 30.2 should be updated based on UÉ-confirmed information prior to adoption of the Plan. The modified figures from Table 30.2 shall replace the corresponding figures in the Village Asset tables contained in settlements plans (Volumes 2 and 4).

The Comments column of Table 30.2 shall be modified as recommended.

## Recommendation

**CE-30-06** In **Chapter 30 Water infrastructure**, update **Table 30.2 Wastewater treatment plants in County Sligo** before the publication of the final Sligo CDP 2024-2030, using figures confirmed by Uisce Éireann.

The modified figures from Table 30.2 shall replace the corresponding figures in the Village Asset tables contained in settlements plans (Volumes 2 and 4).

**CE-30-07** Amend the **Comments** column of **Table 30.2** as follows:

**Ballincar:** Residents of Ballincar **will may** be able to connect to the upgrade to the Rosses Point Sewerage Scheme\*, which will pump wastewater to the Teesan pumping station and onwards to Sligo Waste Water Treatment Plant\*\*\*\*\* where spare capacity is available. [Connections to the network will be subject to feasibility assessment, via UÉ's New Connections process and UÉ's Connections Charging Policy.](#)

**Sligo Town:** There is **potential capacity** to upgrade the plant to 75,000 PE.

## Issue 28 – Sludge management

The submission suggests the following amendment to Section 30.2.5 Sludge management:

*..... UÉ's National Wastewater Sludge Management Plan (NWSMP) – a strategy...optimised on a regional basis rather than county basis. The NWSMP's proposals for sludge treatment and reuse are informed by EU legislation and supported by regional and planning policy e.g. NPO 63 and RPO 8.12.*

## Response

The information is noted, but it **does not require any amendments to the Draft Plan.**

## Issue 29 – Wastewater treatment policy P-WWT-1

UÉ suggests the following amendments to P-WWT-1:

*Co-operate with Uisce Éireann in the provision of adequate wastewater ~~treatment capacity~~ **infrastructure** to support the growth of County Sligo's settlements in accordance with the Core Strategy **and to realize the objectives and policies of the Draft Plan, including projects and programmes identified in Uisce Éireann's Capital Investment Plan and any superseding investment plans.***

*~~A. programme of upgrades / extensions set out in Table 30.B.~~*

*~~B. the provision of new or upgraded WWTPs in the settlements of Cliffony, Mullaghmore, Castlebaldwin, Geevagh and Ballintogher through Uisce Éireann, Small Towns and Villages Growth Programme or any superseding programmes.~~*

P-WWT-1(c): As Uisce Éireann currently has no remit in the area of provision of new infrastructure to unsewered settlements and the Measure A8 scheme is being led by the DHLGH, it would be more appropriate to include this as a separate objective update to 'Cooperate with ~~Uisce Éireann~~ **the DHLGH...**'

### Response

The suggestions are noted and agreed.

### Recommendation

**CE-30-08** In **Chapter 30 Water infrastructure**, amend the **Wastewater treatment policy P-WWT-1** as follows:

- P-WWT-1**
- A.** Co-operate with Uisce Éireann in the provision of adequate wastewater **treatment capacity infrastructure** to support the growth of County Sligo's settlements in accordance with the Core Strategy, **including and to realize the objectives and policies of the Plan, including projects and programmes identified in Uisce Éireann's Capital Investment Plan and any superseding investment plans in relation to Cliffony, Mullaghmore, Castlebaldwin, Geevagh and Ballintogher.**
  - A.** **the programme of upgrades / extensions set out in Table 30.B.**
  - B.** **the provision of new or upgraded WWTPs in the settlements of Cliffony, Mullaghmore, Castlebaldwin, Geevagh and Ballintogher through Uisce Éireann, Small Towns and Villages Growth Programme or any superseding programmes.**
  - B.** **Pursue** the provision of WWTPs in the unserved settlements of Ballygawley and Rathcormac under Measure A8 of the DHLGH Circular L1-22, 'Wastewater Collection and Treatment needs for Villages and Settlements without access to Public Wastewater Services' or any superseding circulars.

## Issue 30 - Wastewater treatment policy P-WWT-2

The submission requests the following amendment to P-WWT-2:

*Require sustainable collection, treatment and discharge of wastewater effluent generated within the County and ensure that effluent/sludge is treated and ~~disposed of~~ reused in accordance with the required EU standards, and as supported by relevant planning policy and UÉ's National Wastewater Sludge Management Plan (and any superseding plans)*

### Response

The request is noted and partially agreed. The reference to "relevant planning policy" is not considered necessary.

### Recommendation

**CE-30-09** In Chapter 30 Water infrastructure, amend the Wastewater treatment policy P-WWT-2 as follows:

**P-WWT-2** Require sustainable collection, treatment and discharge of wastewater effluent generated within the County and ensure that effluent/sludge is treated and **disposed of reused** in accordance with the required EU standards **and UÉ's National Wastewater Sludge Management Plan (and any superseding plans)**.

## Issue 31 - Wastewater treatment policy P-WWT-4

The submission suggests the following amendment to P-WWT-4:

*Require all new developments to connect to the public wastewater **infrastructure treatment plants**, where **available, and to encourage existing developments that are in close proximity to a public sewer to connect to that sewer. These will be subject to a connection agreement with Uisce Éireann.***

### Response

The suggestion to "encourage" existing development to connect to a nearby public sewer was made by UÉ at pre-draft consultation stage, but it was not considered acceptable. The Council has no legal means to "encourage" existing developments to connect to UÉ sewers.

The other suggested modifications are acceptable.

### Recommendation

**CE-30-10** In Chapter 30 Water infrastructure, modify the first sentence of the Wastewater treatment policy P-WWT-4 as follows:

**P-WWT-4** Require all new developments to connect to the public wastewater **treatment plants, infrastructure**, where **capacity exists in the system available**, subject a connection agreement with UÉ.

## Issue 32 – Surface water drainage policy P-SWD-1

The submission suggests the following amendment to P-SWD-1:

*Require all new developments, redevelopment of brownfield sites and extensions to existing developments (where appropriate) to provide a separate foul and surface water drainage system and to incorporate sustainable urban drainage systems where appropriate in new developments and the public realm. ...*

### Response

The suggestion is noted and agreed, with slightly modified wording.

### Recommendation

**CE-30-12** In Chapter 30 Water infrastructure, amend the first paragraph of the Surface water drainage policy P-SWD-1 as follows:

**P-SWD-1** Require all new developments, redevelopment of brownfield sites and extensions to existing developments (where appropriate) to provide a separate foul and surface water drainage system and to incorporate sustainable urban drainage systems, where feasible.

## Issue 33 – suggested additional policies

The submission suggests additional policies relating to water services, as follows:

- A. *Prior to granting planning permission the Council will ensure that adequate water services will be available to service development and that existing water services are not negatively impacted. The Council should require developers to provide evidence of consultation with Uisce Éireann prior to applying for planning permission.*
- B. *To protect existing wayleaves and buffer zones around water services infrastructure through appropriate zoning and to facilitate the provision of appropriate sites for required water services infrastructure as necessary.*
- C. *To support Uisce Éireann in the promotion of effective management of trade discharges to sewers in order to maximise the capacity of existing sewer networks and minimise detrimental impacts on sewage treatment works.*

### Response

A. The suggested text describes normal development management practice. No additional policy is required.

B. As this submission repeatedly states, UÉ does not have a complete and accurate map of its networks. Requiring the Council to protect wayleaves and designate buffer zones around/along water infrastructure through the CDP would involve extensive investigation and additional mapping.

Wayleaves and buffer zones can be protected by condition attached to any grant of planning permission, based on specific recommendations from UÉ in response to referrals of applications.

C. Supporting UÉ in the “promotion of effective management of trade discharges” is not a matter for the CDP. As indicated above, UÉ can recommend specific conditions UÉ in response to referrals of applications.

**No changes to the Draft Plan are required on foot of the above suggestions.**

## Issue 34 – Flood risk management policy P-FRM-3

UÉ seeks an additional exception from Policy P-FRM-3 where development may be considered for maintenance or extension of existing water supply or wastewater infrastructure.

### Response

The suggestion is agreed.

### Recommendation

**CE-32-01** In **Chapter 32 Flood risk management**, amend the **second paragraph** of the **Flood risk management policy P-FRM-3** as follows:

**P-FRM-3** Contribute towards the general maintenance of a 20-metre-wide flood protection zone around lakes and along both sides of all rivers, and a 100-metre-wide flood protection zone from soft shorelines. Development proposals will be required to maintain these flood protection zones generally free from development.

Exceptions may be considered for strategic road projects, [water services infrastructure](#), river bank enhancement works, bridge and road repair works, in the case of brownfield sites, development on lands zoned subject to policy P-FRM-2 and in cases where the maintenance of the flood protection zone is not practically achievable. Such cases will be assessed on an individual basis and subject to compliance with the Habitats and Birds Directives.

## Issue 35 – New connections to UÉ networks

The submission requests the following addition to Section 33.2.4 Infrastructure and services:

*New connections to Uisce Éireann networks are subject to a connection agreement and the Connections Charging Policy. Further information on this process is available on the Uisce Éireann website.*

### Response

The suggestion is agreed.

### Recommendation

**CE-33-03** In **Section 33.2.4 Infrastructure and services** (Chapter 33 Development management standards), add the following text after the last sentence:

Proposals from private developers to extend existing public wastewater infrastructure networks will be facilitated, where such proposals would result in the servicing of zoned lands. [New connections to Uisce Éireann networks are subject to a connection agreement and the Connections Charging Policy. Further information on the connection procedure is available on the Uisce Éireann website.](#)

## Issue 36 – New wastewater connections in Ballincar

The submission suggest the inclusion of the following clarification in Chapter 37 Ballincar Village Plan:

*Wastewater: connections to the network will be subject to feasibility assessment via our New Connections process, as well as UÉ's Connections Charging Policy.*

### Response

It is agreed to include the clarification in the text of objective 37.2.5.A.

### Recommendation

**CE-37-01** In **Section 37.2.5 Wastewater treatment** (Chapter 37 Ballincar Village Plan), modify the objective A as follows:

- A. Require any proponents of new development to make a pre-connection enquiry **about the feasibility of a connection** to Uisce Eireann wastewater infrastructure. **Connections to the network will be subject to feasibility assessment via UÉ's New Connections process, as well as UÉ's Connections Charging Policy.**

## Issue 37 – Objective 43.2.4.A Wastewater treatment, Cliffony Village Plan

As the proposed solution is to be confirmed, and consideration will be given to pump-away solutions, the submission requests the following amendment to the objective 43.2.4.A:

*A. Pursue, in co-operation with Uisce Eireann, **the provision of license-compliant capacity upgrading of the wastewater treatment plan to ensure it is fully compliant with current standards...***

### Response

The suggestion is agreed.

### Recommendation

**CE-43-01** In **Chapter 43 Cliffony Village Plan, Section 43.2.4 Wastewater treatment** amend **objective A** as follows:

- A. Pursue, in co-operation with Uisce Eireann, **the upgrading of the wastewater treatment plan to ensure it is fully compliant with current standards** **the provision of license-compliant capacity.** In the interim **period**, applications for connection will be assessed on an individual basis by Uisce Eireann considering their specific load requirements. Minor developer-funded improvements may be required.

## Issue 38 – Environmental reports

UÉ requests that the contents of its submission be taken account of in the Environmental Reports, including capacity information in section 4.11.10.2 and table 4.2 of the SEA.

### Response

Noted and agreed. The details provided in the submission will inform the Environmental Repot (Strategic Environmental Assessment). **No change to the Draft Plan is required.**

## Submission 150

### Department of the Environment, Climate and Communications

<https://consult.sligococo.ie/en/submission/slg-c29-150>

The DECC indicates that the State's climate ambitions "are expressed in the Climate Action Plan 2023 (CAP 2023) and will be further updated in Climate Action Plan 2024".

CAP 2023 is the first Climate Action Plan prepared on a statutory basis, pursuant to the Climate Action and Low Carbon Development Act 2015 (as amended in 2021). The legally binding framework established under the Climate Act, with clear targets and commitments set in law, requires public bodies to "*..perform its functions in a manner consistent with:*

- (a) the most recent approved climate action plan,*
- (b) the most recent approved national long term climate action strategy,*
- (c) the most recent approved national adaptation framework and approved sectoral adaptation plans,*
- (d) the furtherance of the national climate objective, and*
- (e) the objective of mitigation greenhouse gas emissions and adapting to the effects of climate change in the State"*

The Department welcomes the dedicated **Chapter 2 Climate Action** of the draft Development Plan, which sets the framework for the Council's commitments and obligations under the Climate Action Plan 2023 (CAP).

The submission also welcomes the following:

- the inclusion of nature-based solutions for managing surface water (Section 30.3)
- the policies supporting active travel, public transport and compact growth (e.g. P-CW-1, P-PT-1 to P-PT-7, Table 2.1 in Section 2.6)
- the inclusion of national renewable energy targets in the Draft Plan and the renewable energy policies/objectives, in particular P-EN-2, P-EN-4, P-EN-5, O-REN-1.

In addition, the DECC submission contains suggestions and observations, many of which are relevant to the Draft Plan. It should be noted that several such observations have already been addressed in the Chief Executive's response to Submission 109 (Electricity Supply Board).

### Supplementary submission from Geological Survey Ireland (GSI)

The DECC has enclosed a "Supplementary submission from Geological Survey Ireland", containing a list of publicly available datasets relevant to Planning, EIA and SEA processes. This list does not require comments or recommendations to be made by the Chief Executive.

## Issue 1 – Chapter 2 Climate Action

The DECC “encourages” the Local Authority to further strengthen Chapter 2 Climate Action by gathering all specific mitigation and adaptation policies, which are incorporated throughout the draft Development Plan, into the chapter on climate action in a concise and accessible form.

### Response

The inclusion in Chapter 2 Climate Action of all the Draft Plan Policies which contribute to mitigation and adaptation to climate change would be an unnecessary repetition of these policies, which would be presented without the relevant context. This would also result in a longer Chapter 2 and, obviously, of the Development Plan (undesirable).

It may be possible to include an additional appendix containing a table of all specific mitigation and adaptation policies, but only after the final Plan is adopted by the Council.

**No change to the Draft Plan is necessary on foot of the above observation.**

## Issue 2 – LECP, LA Climate Adaptation Strategy and Climate Action Plan

Giving full effect to overarching national climate strategies and LECP High-Level Goals in the planning hierarchy through detailed policies is critical in ensuring that the State’s ambitions are met. The Local Authority is, therefore requested to further consider how the draft Development Plan will be aligned with same and with the Sligo County Council’s Climate Adaptation Strategy and Climate Action Plan, by incorporating specific policies and objectives which further the ambitions of said plans and ensure that they have effect in the planning system.

### Response

Section 2.5 (Climate action at Local Authority level) clearly indicates that the LECP/Sligo 2030 Strategy, the Council’s Climate Adaptation Strategy (2019) and the Council’s Draft Climate Action Plan (2023) have been taken into account in the preparation of the Draft Plan.

As the LA CAP was adopted by the elected members in February 2024, its strategic objectives will be incorporated into the Development Plan – refer to the Chief Executive’s supplementary recommendation **CE 02-10 in Section 6** of this Report. **No further change to the Draft Plan is required.**

## Issue 3 – *Long-term Strategy on Greenhouse Gas Emissions Reductions*

The *Long-term Strategy on Greenhouse Gas Emissions Reductions* sets out indicative pathways, beyond 2030, towards achieving carbon neutrality for Ireland by 2050. The Strategy provides a crucial link between Ireland’s 2030 climate targets and the long-term goal set by Ireland’s *National Climate Objective* and the European Climate Law. The Local Authority should have regard to said strategy and ensure that all policies are assessed against it so as to not unintentionally undermine the State’s long-term objectives. This should be incorporated into the SEA process.

### Response

The above-mentioned Strategy has been taken into consideration and its principles incorporated into the SEA process. **No changes to the Draft Plan or SEA Environmental Assessment are required.**

## Issue 3 – Renewable energy targets

The Government's renewable energy targets under the CAP 2023 are as follows:

- Solar PV Capacity 5GW by 2025 and 8GW by 2030.
- Onshore wind capacity 6GW by 2025 and 9GW by 2030.

While the DECC welcomes the inclusion of national targets in the draft Plan, it requests an amendment to the text in the first bullet point of Section 31.1 to appropriately reflect the State's ambition to "reach" 80% renewable electricity, not merely achieve "up to" 80% (p. 119 of the Draft Plan). The submission also requests the inclusion of the 2025 interim targets in Section 31.1.2.

### Response

It is noted that the Climate Action Plan 2024 was published in January 2024. The targets set out in CAP23 have remained unchanged in CAP 24. The requested modifications to Section 31.1.2 are agreed.

### Recommendations

**CE-31-11** In **Section 31.1**, modify the **first bullet point** under the heading **National policy on energy** (p. 119 of the Draft Plan) as follows:

- **Up to** 80% renewable electricity

**CE-31-12** In **Section 31.1.2 Climate Action Plan 2023**, modify the **second paragraph** (p. 120) as follows:

Among the CAP's most important measures to increase the proportion of renewable electricity to 80% by 2030 are the targets of 9 GW from onshore wind (6 GW by 2025), 8 GW from solar source (5 GW by 2025), at least 5 GW from offshore wind energy and at least 500 MW of community-based renewable energy projects. *It is noted that CAP24 (published in January 2024), includes at least 2GW from new flexible gas plant.*

## Issue 3 – Energy security

The DECC notes that renewable electricity generation is central to Ireland's energy security plans and requests the Local Authority to refer to the recently published *Energy Security in Ireland to 2030*.

### Response

The above-mentioned document was published by the DECC in November 2023, during the period of public consultation on the Draft Plan. The document represents a national-level strategy, which does not mention any specific role for local authorities.

It should be noted that the issue of energy security has already been addressed by the Chief Executive in response to Submission 109 (ESB).

**No further change to the Draft Plan is necessary on foot of the above request.**

## Issue 4 – Renewable Energy Strategy

The Department recommends the inclusion of a specific time-bound commitment to adopt the Renewable Energy Strategy for County Sligo within 12 months of whichever of the following two strategies is published first: i) the Regional Renewable Electricity Strategy, ii) revised Methodology for Local Authority Renewable Energy Strategies (SEAI).

### Response

The recommendation is noted. The issue has been addressed in the Chief Executive's response to Submission 184 (OPR), in **Section 4** of this Report.

**No further change to the Draft Plan is required on foot of this observation.**

## Issue 5 – Repowering existing wind farms

The submission suggests the inclusion of a specific objective to promote the repowering and extension of the lifetime of existing wind power installations and to enhance the development of additional renewable energy infrastructure in the County, including solar as well as supporting grid infrastructure.

### Response

The suggestions is noted. The repowering of wind farms has been addressed in the Chief Executive's response to Submission 109 (ESB).

It is considered that the development of renewable energy infrastructure, including solar energy, and the power grid are adequately addressed by the energy policies (P-EN) in Chapter 31, together with the proposed amendments in response of Submission 109.

**No further change to the Draft Plan is required on foot of this observation.**

## Issue 6 – Wind Energy Guidelines

The submission notes that the Draft Wind Energy Development Guidelines (2019) are not finalized and the 2006 guidelines remain in place until the ongoing revision of the existing Guidelines are completed. It is suggested that Section 33.11.1 be amended to replace the 2019 draft Guidelines with the existing 2006 Guidelines "or any update thereof".

### Response

The observation is noted. The references to Wind Energy Guidelines should indeed be consistent throughout the Plan. This issue has already been addressed by the Chief Executive in response to Submission 109 (ESB).

**No further change to the Draft Plan is required on foot of this observation.**

## Issue 7 – National Hydrogen Strategy

The **National Hydrogen Strategy**, which is the first major policy statement on renewable hydrogen in Ireland, sets out the strategic vision on the role that hydrogen will play in Ireland's energy system. In the shorter term, this strategy sets out several actions aiming to remove any barriers which could inhibit early hydrogen projects from progressing.

The Department "encourages" the Local Authority to "give consideration of specific reference to the Hydrogen Strategy in support of potential policy on hydrogen".

### Response

National Hydrogen Strategy, published in July 2023, is a high-level strategy, which does not assign any specific role to local authorities. Spatial planning is mentioned only four times, in the context of an intended future "*review of the entire hydrogen value chain to identify any other gaps within our spatial planning, environmental permitting and licensing regimes*". This is not considered relevant for the Development Plan.

**No change to the Draft Plan is necessary on foot of the above suggestion.**

## Issue 8 – Offshore renewable energy

The development of significant Offshore Renewable Energy (ORE) is required over the coming decade to meet the ambitious goal of 80% renewable electricity by 2030. The DECC notes RPO 4.19 of the NWRA RSSSES, which supports offshore wind energy *energy production through the adequate provision of land-based infrastructure and services*.

The Department "encourages" specific objectives and policies to support and facilitate the sustainable development of offshore wind opportunities off the Sligo Coastline in accordance with emerging maritime and land- side planning policy.

### Response

The suggestions are noted. The issue of offshore wind and marine renewable energy has been addressed in the Chief Executive's response to Submission 109 (ESB).

It is considered that the development of offshore wind energy and associated infrastructures adequately addressed through the energy policies (P-EN) in Chapter 31, together with the proposed amendments in response to Submission 109.

**No further change to the Draft Plan is required on foot of this observation.**

## Issue 9 – Heat energy

The Local Authority is requested to "consider how the draft Development Plan can further support the electrification of heating and, in particular, the roll-out of district heating schemes in accordance with RPO 4.20 during the finalisation of the draft Development Plan".

It is further stated that "...consideration could be given the use of heat mapping to allow for the identification of local waste heat sources, in accordance with the Development Plan Guidelines".

## Response

The issues mentioned above are appropriately addressed in the Local Authority Climate Action Plan (2024) – for example, refer to LA CAP Action 18 (electrification of heating) and DZ Action 8 (district heating in the Decarbonising Zone).

**No change to the Draft Plan is necessary on foot of this request.**

## Issue 10 – Waste recovery and disposal facilities

The DECC welcomes the Local Authority's integration of the *'Best practice guidelines for the preparation of resource & waste management plans for construction & demolition projects'* into the project planning and design processes (Section 33.2.8 Waste management)

The Local Authority is requested to include an objective for waste recovery and disposal facilities.

## Response

Section 10.5.3 Land-use zoning objectives (Chapter 10 in Volume 2 of the Draft Plan) indicates that waste recovery and disposal facilities can be provided on lands zoned BIE (business, industry, enterprise), TU (transport and utilities infrastructure), NR (natural resources), while waste recycling facilities are open to consideration in Rural Villages and even on lands zoned CF (community facilities).

**No change to the Draft Plan is necessary on foot of the above request.**

## Issue 11 – Geothermal energy

The submission notes that the Draft Plan "is cognisant of geothermal energy as a secure, reliable and renewable form of energy (Section 31.3.6)". The Department "encourages" the Local Authority to include policy which supports the development of geothermal energy in Sligo, having regard to the ***Policy Statement on Geothermal Energy for a Circular Economy***.

## Response

There are currently no S. 28 planning guidelines for geothermal energy developments, but a section in the above-mentioned Policy Statement (published in July 2023) indicates that "The Department (DECC) will investigate the potential scope, cost and sources of funding for a Geographic Information System planning tool to integrate geothermal potential in local area spatial planning, reflecting the policy objectives of the National Planning Framework and Regional Spatial and Economic Strategies".

Until the publication of relevant planning guidelines, it is considered that the energy policies (P-EN) included in Chapter 31 of the Draft Plan address all forms of renewable energy, including geothermal energy, to a degree that is sufficient for ensuring the proper planning of County Sligo.

**No change to the Draft Plan is required on foot of the above suggestion.**

## Issue 12 – Telecommunications

The Department would welcome or “encourage” the following:

- specific reference and policy which supports the objectives of NSO 6 of the NDP and *Harnessing Digital – The Digital Ireland Framework*;
- a direct reference to supporting 5G rollout;
- Sligo County Council to create a centralised telecoms unit to manage all issues relating to telecoms, access to local authority assets and Smart Initiatives;
- commitment to efficiently process application for required permits and licences to the scaled needed to support the NBP deployment
- a commitment to publish inventories of ducting and other assets owned by the State and develop a streamlined process to allow for easy accessibility for access seekers.

### Response

The above suggestions are either not relevant/outside the scope of a Development Plan or relate to operational matters that do not require “commitments” in the Plan.

**No change to the Draft Plan is required on foot of the above suggestions.**

## Submission 194

### Fáilte Ireland

<https://consult.sligococo.ie/en/submission/slg-c29-194>

Fáilte Ireland's submission seeks to enhance the policy coverage in the Draft Development Plan to ensure a meaningful framework is established for the enhancement of tourism in the County during the Plan period.

The submission has been prepared having regard to the tourism profile of the County, the policy context in the Draft Plan and an established template for sustainable tourism policies being used by Fáilte Ireland to guide Planning Authorities.

#### Issue 1 – “Dedicated Tourism Chapter/Section”

Fáilte Ireland considers that “given the relative value of tourism to the County economically, socially and culturally, specifically referencing the policies contained within Volume 1 including RPO 3.7.47 RPO 3.7.56, and LECP High-Level Goals Goal 5, that tourism could be more strongly referenced throughout the Draft Development Plan and in particular the inclusion of a dedicated Tourism Chapter rather than its inclusion as a subsection of Chapter 28, would ensure that all aspects of tourism policy are captured in a clear and robust manner within the Development Plan”.

The submissions suggests that such a chapter “would allow for tourism policies and objectives to be clearly set out and where possible, should be illustrated through the inclusion of relevant maps in the Development Plan”, identifying “strategic tourism locations; transport routes; scenic routes and views; tourism attractions and facilities; and transportation hubs”.

#### Response

While the Draft Plan explicitly recognises the value of the tourism industry, this is only one component of County Sligo's diverse economy. The **tourism development policies and objectives set out in Section 28.3 Tourism development** are robust and sufficient for ensuring the proper planning and sustainable development of the County.

The Draft Plan clearly identifies the elements mentioned in Fáilte Ireland submission: strategic tourism locations and attractions, scenic routes and further opportunities for outdoor activities and cultural tourism. Such assets are protected by the Draft Plan mainly through policies relating to landscape, natural and built heritage, in addition to tourism development policies.

Tourist maps do not relate to spatial planning and do not pertain to the County Development Plan. Extensive information on all tourism-related matters is widely available both online and in print.

**No change to the Draft Plan is required on foot of the above suggestions.**

## Issue 2 – Wild Atlantic Way Regional Tourism Development Strategy

The submission notes that the Wild Atlantic Way is referenced in Chapter 28.3.1 and its importance acknowledged as the most significant tourism attractor in Sligo. It is suggested that “the section should be greater aligned with the Fáilte Ireland Wild Atlantic Way Strategy” as set out in the Wild Atlantic Way Regional Tourism Development Strategy 2023-2027.

Fáilte Ireland requests the inclusion of an objective “supporting the preparation and implementation of the Wild Atlantic Way Regional Tourism Development Strategy 2023-2027, to support the continued collaboration with Fáilte Ireland and tourism stakeholders to ensure successful implementation and delivery of regional tourism plans”.

### Response

The suggestion is noted and agreed. The Wild Atlantic Way sub-section in Section 28.3 Tourism development (Chapter 28 Economic development) would benefit from a supplementary narrative referring to the Wild Atlantic Way Regional Tourism Development Strategy 2023-2027 and a corresponding supporting policy.

### Recommendations

**CE-28-07** In **Section 28.3 Tourism development** (Chapter 28 Economic development), add the following text under the heading Wild Atlantic Way (WAW):

Fáilte Ireland’s Wild Atlantic Way Regional Tourism Development Strategy 2023 – 2027 is a roadmap for the industry and all stakeholders involved in tourism in the region. It is primarily informed by a number of Government strategies and also by planning policy (NPF, RSES, lower-tier plans). The ambition of the Strategy is “to drive recovery and growth in the Wild Atlantic Way region” by creating sustainable, high-quality jobs in tourism and related areas. For Sligo, the Strategy prioritises the delivery of the Fáilte Ireland investment projects currently underway such as Queen Maeve Square in Sligo Town and the National Surf Centre in Strandhill, while continuing to develop new and pipeline projects.

**CE-28-12** In **Section 28.3 Tourism development**, add the following Tourism development policy:

**P-TOU-7** Support the implementation of the WAW Regional Tourism Development Strategy 2023-2027 (and any successor strategies) in collaboration with Fáilte Ireland and tourism stakeholders.

## Issue 3 – Sustainable tourism

As the National Development Authority for tourism in Ireland, Fáilte Ireland recognises and will continue to ensure that all tourism initiatives it participates in are planned, developed and managed in a sustainable and integrated manner.

For Sligo, in addition to decarbonising the tourism sector, the most important sustainability challenge for the Wild Atlantic Way will be to achieve more balanced regional development of tourism. Future development “will keep within environmental capacities and ensure tourism activities do not impact negatively on sensitive environments, habitats and species, or on local communities”.

Fáilte Ireland considers appropriate that the sustainable development of tourism in the county is recognised for the role it plays and the significant role it will play in the future to contributing to climate action and a more sustainable county in a broader context.

The submission recommends including a policy which supports Sligo as a sustainable tourism destination.

## Response

Tourism development policy **P-TOU-1** (Section 28.3, page 86 of Volume 3) promotes the development of tourism in Sligo in a sustainable manner.

**No change to the Draft Plan is required.**

## Issue 4 - Festivals and events

The submission indicates that festivals are key motivators for local, domestic and international consumers, as they increase both dwell time and economic impact. Sligo benefits from the Regional Festival Fund and also has three nationally funded festivals, including Sligo Live and St Patrick's Day Celebrations.

Fáilte Ireland notes that Chapter 28.3.2 includes text indicating that *'the Council will develop a Festival and Events Strategy to underpin policy and coordinate the Festival and Events offering in the county'* and requests the inclusion of the following objective:

*The Council will develop a Festival and Events Strategy to support and promote existing festivals and sporting events to increase the cultural, heritage and lifestyle profile of the county, and, where appropriate, promote and facilitate the development of new festivals and events.*

## Response

The proposed objective is already included in the Sligo 2030/Local Economic and Community Plan. Repeating it in the CDP would not bring any additional benefits.

**No change to the Draft Plan is required.**

## Issue 5 - Destination Experience Development Plans (DEDPs)

Fáilte Ireland is preparing **Destination and Experience Development Plans** - an approach that identifies the key assets of an area and provides a framework to present its experiences and stories in a way that visitors can readily and easily understand.

A DEDP clearly identifies tangible actions and a process for businesses to shape their respective tourist experience(s) in line with the overall experience brand proposition and the key motivating themes for their area.

While the Development Plan references the forthcoming Sligo Destination Experience Development Plan (DEDP), there is no explanatory text or supporting policies and objectives.

The submission requests the inclusion of an objective acknowledging and supporting existing and future Destination and Experience Development Plans, and supporting continued collaboration with Fáilte Ireland and tourism stakeholders to ensure successful implementation and delivery of these plans.

## Response

Fáilte Ireland has published a Draft Sligo DEDP in January 2024, three months after the issuing of the Draft Sligo CDP Plan for consultation. It is agreed to update the Tourism section with a short explanatory text and an objective supporting the implementation of the Sligo DEDP 2024.

## Recommendations

**CE-28-05** In the introduction to **Section 28.3 Tourism development**, add the following text:

The Sligo Destination and Experience Development Plan (Sligo DEDP) is a five-year sustainable tourism development plan for the County. The strategic initiatives for the Sligo DEDP are based on the Strategic Objectives of the Wild Atlantic Way Regional Tourism Development Strategy. Among the 10 Catalyst Projects, the “Attraction of Scale – Hazelwood Demesne” has the highest potential to contribute to the achievement of RPO 3.7.56 of the RSES, which envisages the delivery of a tourist attraction of scale in Sligo Town.

**CE-28-10** In **Section 28.3 Tourism development**, insert an **additional Tourism development policy** as follows:

**P-TOU-8** Support the implementation of the Sligo Destination Experience Development Plan (DEDP), continuing the collaboration with Fáilte Ireland and tourism stakeholders.

## Issue 6 – Tourism initiatives in Enniscrone

Enniscrone Town has been granted investment under Fáilte Ireland’s Destination Towns funding programme, allowing Sligo County Council to enhance public spaces such as squares, streetscapes and markets.

Fáilte Ireland requests reference to this in the Development Plan, both in a Tourism Chapter and in Chapter 13 Enniscrone Town Plan, and the inclusion of an objective to support future tourism initiatives in Enniscrone.

## Response

There is an abundance of references to ongoing and future tourism initiatives in Enniscrone, both in Chapter 13 Enniscrone Town Plan (Volume 2) and in Section 28.3 Tourism development (Volume 3), accompanied by corresponding objectives. No further references or objectives are necessary.

**No change to the Draft Plan is required.**

## Issue 7 - Development Guidelines for Tourism Destination Towns

Fáilte Ireland has published ‘*Development Guidelines for Tourism Destination Towns*’ to provide a framework to support communities and Local Authorities and set out the key drivers of what makes a town appealing to the international tourist.

These guidelines are intended as a practical aid to Local Authorities, Chambers of Commerce, LEADER Programme Local Action Groups and other business and community groups who consider their town to either be a tourism destination town or have the potential to develop as one. They can also be used by smaller towns and villages with the potential to further develop as day trip destinations. These Guidelines should be referenced within the Draft Development Plan.

## Response

Noted and agreed. The requested reference should be included in Section 28.3 of the Draft Plan.

## Recommendation

**CE-28-06** In **Section 28.3 Tourism development**, insert the following text in the **introductory part** (page 83):

*Fáilte Ireland has published [Development Guidelines for Tourism Destination Towns](#), which set out the key drivers of what makes a town appealing to the international tourist. These guidelines are intended as a practical aid to all stakeholders, including community groups who consider their town to be a tourism destination or having the potential to develop as one.*

## Issue 8 - International Mountain Bike Project

The submission notes that Section 28.3.1 includes text in relation to the Coolaney National Mountain Bike Centre, but there is no specific supporting policy or objective for such an important project, and no reference to Fáilte Ireland as one of the project stakeholders.

The submission requests inclusion of an objective to support and promote both the International Mountain Bike Project and the development of mountain biking routes/trails generally. This could also be referenced under Chapter 27.7.4 Outdoor Recreational Amenities.

## Response

The Coolaney Mountain Bike Centre is already mentioned in Section 27.7.4 Outdoor recreational amenities, which supports the development of all outdoor facilities, including cycle routes. As a nearly completed project, the facility at Coolaney no longer requires a supporting CDP objective.

**No change to the Draft Plan is necessary.**

## Issue 9 – Queen Maeve Square

The redevelopment of Stephen Street car park, into a fully pedestrianised public space known as Queen Maeve Square, funded by Fáilte Ireland, the Urban Regeneration Development Fund and Sligo County Council has commenced. When completed, it will provide a new civic space for visitors, walking & food tours and the Garavogue River Trail.

Fáilte Ireland considers that this should be “more robustly identified in the Draft Plan with supporting policies and objectives to ensure that it can be a catalyst for further regeneration and development”

## Response

The Queen Maeve Square project is likely to be completed before the adoption of the CDP 2024-2030. Its potentially catalytic role in urban regeneration would be more appropriately addressed in the forthcoming Sligo Town Local Area Plan.

**No change to the Draft CDP is required.**

## Issue 10 – Water sports activity facilities

Rosses Point and Enniscrone are benefiting from funding under the Fáilte Ireland's Platforms for Growth Programme. The submission requests inclusion of an objective which supports the development of facility centres for water-based activities in the county, as well as reference to the projects mentioned above.

## Response

In Section 28.3, Wild Atlantic Way objective O-WAW-2 relates to water-sports activities at designated locations along WAW, which include Enniscrone and Rosses Point. It agreed to modify the objective to include the names of the two settlements.

## Recommendation

**CE-28-11** In **Section 28.3 Tourism development**, modify the Wild Atlantic Way objective O-WAW-2 as follows:

**O-WAW-2** At designated locations, **including Enniscrone and Rosses Point**, provide facilities and access points for controlled water-sports activities, in a manner that avoids conflict with nature conservation and activities such as swimming, sailing, fishing and mariculture.

## Issue 11 – Tourism uses for vacant buildings

The submission notes that Policies P-VHOU-1 and P-VHOU-2 don't specifically relate to tourism accommodation, which could be referenced here. It is requested to encourage the redevelopment of derelict, vacant or redundant buildings, in appropriate locations in order to provide for visitor accommodation and tourism development, while having regard to ecological constraints and architectural heritage requirements. It is further requested to amend policy P-AC-5 in Section 27.4.

## Response

Agreed. In Chapter 26 Residential development, the Vacant housing policy P-VHOU-2 (p. 55 of the Draft Plan) should be modified to include "tourism-related uses". The Chief Executive has already recommended an appropriate amendment to policy P-AC-5 – refer to **CE-27-05**.

## Recommendations

**CE-26-11** In **Section 26.5.2 Vacant housing** (Chapter 26 Residential development, Volume 3), modify **policy P-VHOU-2** as follows – see *next page*

**P-VHOU-2** Where reactivation of residential uses is not feasible, adopt a flexible approach towards alternative uses of vacant dwellings in towns and villages, **including redevelopment for tourism-related uses**, subject to appropriate design and compatibility with existing and proposed surrounding uses.

## Issue 12 – “Eco-tourism” reference

The submission indicates that “Sustainable Tourism is a key consideration for visitors”. It suggests that “Sustainable Tourism is the more appropriate term rather than eco-tourism and as such the text in this section [i.e. S. 28.3.1 Rural tourism] should be amended to reflect this”.

### Response

“Eco-tourism” in the context of Section 28.3.1 Rural tourism (p. 83) relates to **nature-based activities** that increase visitor appreciation and understanding of natural and cultural heritage. This is different from the concept of sustainable tourism, which is not the subject of the respective paragraph.

**No change to the Draft Plan is required.**

## Issue 13 - Walking trails

The submission requests the following amendment to the section on Walking Trails:

### **Proposed amended Policy P-TOU-2:**

*In recent years, Sligo County Council has invested significantly in walking infrastructure. The county now has a network of walking trails of ~~all levels of difficulty~~ **various gradients to suit all levels of ability**, through landscapes such as uplands, coastal, lakeside, forestry.*

### Response

Tourism Policy P-TOU-2 does not relate to walking trails. However, there is no objection to amending **the narrative under the heading Walking trails** (p. 83 of the Draft Plan) as requested above.

### Recommendation

**CE-28-13** In **Section 28.3.1 Rural tourism**, modify the text under the heading Walking trails as follows:

In recent years, Sligo County Council has invested significantly in walking infrastructure. The county now has a network of walking trails of **all levels of difficulty various gradients, suitable for all levels of ability**, through landscapes such as uplands, coastal, lakeside, forestry.

## Issue 14 – Tourist accommodation

It is requested that the following amendment to Policy P-TOU-2 be included:

### **Proposed amended Policy P-TOU-2:**

*Support the development of high-quality tourist accommodation and ensure high standards of architectural and urban design in all new tourist accommodation and facilities, while at the same time ensuring that there is sufficient tourism accommodation, of all types, for visitors including hotels, guesthouses, hostels, B&Bs and, holiday homes, glamping/ camping/ caravan and campervan sites to towns and villages.*

In addition to the above requested amendment to Policy P-TOU-2, Fáilte Ireland has prepared an Accommodation Audit for County Sligo, and this should inform policies TOU-P-6, TOU-P-7 and TOU-P- 2 and objectives set out in the Development Plan.

Section 4 (pages 26-31) of the Accommodation Audit sets out product trends, development opportunities and development locations of which should be referred within the Development Plan.

## Response

The Draft Plan supports sustainable tourism development proposals and seeks to ensure high standards of architectural and urban design, as specified in P-TOU-2. It is outside the remit of the CDP to “ensure there is sufficient tourism accommodation”. It is not considered necessary to amend the tourism development policies, which are general in nature, to include details from Fáilte Ireland’s Accommodation Audit.

However, there is no objection to the inclusion of **an additional policy** facilitating the provision of a wider variety of tourist accommodation in more types of locations around the County.

## Recommendation

**CE-28-09** In **Section 28.3 Tourism development**, insert an additional policy as follows:

- P-TOU-9**
- A.** Facilitate the provision of new tourist accommodation and the expansion or upgrading of existing hotels, guesthouses, B&Bs and other tourist accommodation premises at appropriate locations throughout the County, particularly in areas with existing services.
  - B.** Support the redevelopment of brownfield sites, both in settlements and in rural areas, for the provision of tourist accommodation.
  - C.** Support the development of camping, glamping and facilities for campervans/motor homes/touring caravans, both within settlements and in rural locations across the County.

Sites in rural locations should be close to existing tourist establishments where it can be demonstrated that there is a justifiable demand for new accommodation, and that the proposed development will not adversely affect the character, environmental quality and amenity of the rural area.

## Submission 209

### HSE National Environmental Health Service (NEHS)

<https://consult.sligococo.ie/en/submission/slg-c29-209>

The NEHS makes its submission “under the remit of Healthy Ireland and relevant supporting health strategies”, aiming to “incorporate relevant environment and health actions into the strategic planning of the spatial and built environment” of Sligo County Development Plan 2024-2030.

There appears to be some confusion regarding the type of plan being prepared and the stage in the process. The submission constantly refers to the “Draft Local Area Plan”, but also to the “Strategic Development Plan”, “Joint Urban Area Plan” and “Draft JLAP”. The majority of the recommendations are for policies to be included in such plans. There is no reference to the actual Draft Sligo CDP 2024-2030 and its proposed policies and objectives.

Furthermore, the submission includes a number of requests that are outside the scope of the Development Plan, but are addressed in other strategic documents of the Local Authority, particularly the Sligo 2030 Local Economic and Community Plan. Such requests are:

- that the Draft Plan should aim to support community involvement in the development of health services and **Healthy Ireland** initiatives;
- that the Plan should assist in the delivery of a “**Tobacco Free Ireland**” by promoting tobacco-free playgrounds, environments, parks and waterfronts;
- that the Plan should support planning and development that helps reduce the obesogenic environment and promote healthy lifestyles;
- the Plan should support and fulfil the **United Nations’ 17 Sustainable Development Goals** for the period 2015-2030;
- that the Plan should take account of “**Our Sustainable Future – A Framework for Sustainable Development**”;
- that the Local Authority should aim to deliver skill sets in areas such as green procurement, carbon accounting, carbon management and energy management;
- that the Development Strategy should continue to expand and implement waste prevention measures with local business and community groups; a reuse policy should be developed and implemented within public bodies;
- that the Plan should align with the **Circular Economy and Miscellaneous Provisions Act 2022**;
- that consideration should be given to the development of a **Food Strategy for Sligo Town**, in the interest of health and wellbeing of residents and to create employment in promote Sligo Town’s food tourism potential.

While the suggestions are considered positive, **the spatial planning framework provided by County Development Plan is not the appropriate document to address such issues**. The LECP remains the primary strategic document which will guide the social, community and economic development of the County to 2030, with a great emphasis on health and wellbeing.

With regard to the suggestions that might be seen to be applicable to the Draft Sligo CDP 2024-2030 (although more suitable for a pre-draft consultation, not to consultation on an actual Draft Plan), these are grouped under the several general headings. Brief summaries are provided below, with a general CE response and recommendation at the end.

## **Physical activity**

The Plan should support active play, sport and active travel through the provision of publicly accessible sports/recreational and amenities facilities. Transport options should put pedestrians first, followed by cyclists, public transport and private vehicles “at the bottom”.

The Plan should include reference to the National Sustainable Mobility Policy 2022, Smarter Travel Policy 2009-2020 and updates, National Cycle Policy Framework 2009-2020 and updates etc.

## **Positive ageing and support for people with disabilities**

The Plan should take note of the National Positive Ageing Strategy and ensure the following:

- provision of age-friendly public spaces, transport and buildings;
- assessment of housing need and provision of social/sheltered/retirement housing;
- promotion of lifetime adaptable housing and design;
- meeting the housing needs of people with disabilities.

## **Energy efficiency**

The Plan should promote and facilitate the incorporation of energy-efficient design into projects, and support the Better Energy Communities Scheme to enable locally-based solutions.

## **Smarter Travel Policy, National Cycle Policy Framework**

The submission lists a large number of requests under the above headings, such as:

- specification of maximum level of car parking for commercial development located within reach of public transport facilities and within walking/cycling distance of amenities
- additional car parking spaces at train stations;
- reduction in the necessity to travel, implementation of safe walking and cycling routes to schools, better access for people with disabilities;
- provision of secure bike parking and changing / showering facilities at places of employment;
- Prioritisation of pedestrians over vehicles, widening of footpaths, rationalising of signage;
- introduction of traffic calming measures to make junctions safe for cyclists;
- ensure that cycle paths are well maintained, lit and signposted;
- retrofit the urban road infrastructure to be cyclist-friendly and link up all existing cycle lanes.

## **Waste**

The Plan should implement the waste hierarchy and “place prevention and minimisation at the forefront of any waste policy”, support the people of Sligo to segregate waste in public spaces and consider the development of “locally accessible civic amenity sites”.

## **Water**

The Plan should “strategically aim to ensure the provision of safe, secure drinking water and reduce water waste and overuse”. The design and installation of water supply must provide potable water in compliance with the EC Drinking Water Regulations 2023.

The Plan should “include opportunities for the provision of drinking water points in public spaces.

## **Biodiversity and green areas**

A “Local Biodiversity Action Plan” should be developed. Opportunities for green infrastructure should be explored and integrated into the design of public areas. In addition to public open space and natural assets such as beaches, the EHS also supports the provision of allotments, which promote healthy eating.

## **Environmental noise**

The Plan should consider noise mitigating measures, including planting and limitations on hours of operation of certain activities.

## **Flood risk**

The Council should carry out a Strategic Flood Risk Assessment of the policies and objectives of the Plan.

## **Air quality**

The plan should aim to reduce pollution emissions into air and increase the quality of air in Sligo.

## **Climate change**

The Plan should support actions that move Ireland to “a low carbon, climate-resilient and environmentally sustainable economy by 2050”, on the basis of the Climate Action Plan 2023.

## **Response**

Having examined the provisions of the Draft Plan in light of the above suggestions, it is considered that the relevant policies, objectives and corresponding amendments recommended by the Chief Executive in this Report respond adequately to the requirements of the HSE National Environmental Health Service.

Somme of the very detailed suggestions would be more appropriately considered as part of the preparation of the forthcoming Local Area Plan for Sligo Town and Environs.

**No change to the Draft Plan is recommended on foot of this submission.**



## Section 8.

# Submissions made by elected members of Sligo County Council

During the public consultation period, three submissions were received from elected members of Sligo County Councils.

**Submission 100**, made by *Sligo County Councillors Planning Group*, was signed by ten members: Cllr Gerry Mullaney, Cllr Paul Taylor, Cllr Joe Queenan, Cllr Dara Mulvey, Cllr Michael Clarke, Cllr Thomas Healy, Cllr Thomas Walsh, Cllr Marie Casserly, Cllr Martin Connolly and Cllr Martin Baker.

**Submission 156** was signed by Cllr Joe Queenan.

**Submission 180** was signed by Cllr Donal Gilroy.

## Submission 100

### Sligo County Councillors Planning Group

<https://consult.slilococo.ie/en/submission/slg-c29-100>

#### Issue 1 – Volume 1 Core Strategy

The submission requests that the Core Strategy map (Fig 3.A) should clearly define the boundary of the various areas. It is suggested that the map should be accompanied by a list of townlands or a map with a red line clearly defining, in particular, the boundary between Rural Areas under Urban Influence and Remote Rural areas.

#### Response

Section 10(2B) of the Planning Act requires the principal elements of the Core Strategy to be represented on a diagrammatic map, which must include the settlement hierarchy of the county, relevant roads and the rural area types required under the Sustainable Rural Housing Guidelines.

The Core Strategy Map incorporated in the Draft Plan illustrates this information indicatively at a County level. It is acknowledged that, at this scale, it can be difficult to establish which rural settlement policy applies at individual site level.

An interactive map is, therefore, required to be prepared. This will display all relevant designated areas prescribed in the plan, including a clear definition of the boundary between Rural areas under urban influence and Remote Rural areas.

#### Recommendation

**Following the adoption of the Plan, an interactive web-based map shall be made available to the public.**

The web-based map will clearly delineate the various areas prescribed in the Plan, such as land-use zoning, flood zones, rural area types, designated areas, landscape character areas etc.

## **Issue 2 – Section 5.1 Settlement structure and hierarchy**

The submission indicates that *Villages with Special Coastal Tourism Functions* should include Enniscrone.

### **Response**

The Draft Plan's Settlement Strategy places Enniscrone on a higher tier (*Support Town*) than the *Villages with Special Coastal Tourism Functions*. Enniscrone's significance in terms of coastal tourism is clearly recognised throughout the Draft Plan.

**No change to the Draft Plan is required.**

## **Issue 3 – Section 5.2 Population growth and housing supply**

The submission argues that the population and housing projections set at national level have not made sufficient allowance for the influx of war victims that Ireland has experienced over the last 2 years.

The current population figures should reflect current levels by incorporating International Protection Applicants (IPA) figures for the county on top of projected Census figures, or there will be a severe shortage of housing in the county.

### **Response**

The observation is noted. The potential housing yield of lands proposed to be zoned for residential and mixed uses exceeds the County's formal housing allocation by circa 12% (considering the amendments recommended by the Chief Executive in response to the OPR submission 184).

It is considered that this potential excess will be sufficient to cater for IPA accommodation needs, should this be required by the government, whose strategy to date has been to accommodate these needs through the conversion / reuse of existing buildings rather than new build.

**No change to the Draft Plan is required.**

## **Issue 4 – Section 5.4.2 Settlements with Special Coastal Tourism Functions**

The submission agrees that appropriate zoning and specific objectives supporting this function are important, but this is not reflected in the urban development plans.

For example, the Easky Plan does not include any area zoned for future tourism development and the village cannot expand if there is not sufficient zoned lands for such developments.

### **Response**

In addition to the many vacant structures on Easky's Main Street, which could be repurposed for tourist accommodation, there are also two substantial sites zoned for tourism, which had not been fully developed at the time of drafting the Plan.

**No change to the Draft Plan is required.**

## **Issue 5 – Section 5.4.3 Villages Sustaining Rural Communities**

The submission agrees that it is necessary to support these settlements and seek to direct a certain amount of development into villages with adequate infrastructural capacity, in order to ensure that local services are sustained and to offer a suitable alternative to rural one-off housing.

However, the potential for new development of residential units in Easkey is restricted to a site within the ownership of Sligo County Council and a site on farmlands on the western end of the village. Alternative sites should have been considered and included.

Similarly, it is argued that the amount of lands zoned for residential development in Enniscrone will not meet the demand.

### **Response**

Enniscrone and Easky are not included in the category of Village Sustaining Rural Communities; they are placed on higher tiers in the Settlement Strategy.

The housing allocations for second-tier settlements (e.g. Enniscrone) and third-tier settlements (e.g. Easky) under the Core Strategy have been confirmed by the OPR as being “appropriate in respect of their infrastructural capacity”. The amounts of land proposed to be zoned for residential uses in each settlement are proportional to these housing allocations.

**No change to the Draft Plan is required.**

## **Issue 6 – SP-S-4, SP-S-5, SP-S-6 Strategic Settlement Policies for towns and villages**

The submission agrees with the inclusion of these policies, but suggests that they need to be reflected in the village and town plans.

### **Response**

The above-mentioned policies relate to villages placed below the second tier in the Settlement Strategy. The policies are reflected in the proposed zoning (including the new Rural Village zoning objective) and are supported by additional policies and objectives of the Draft Plan, particularly those related to active travel, tourism and water services infrastructure.

**No change to the Draft Plan is required.**

## **Issue 7 – SP-S-9 and SP-S-11 Strategic Settlement Policies for rural areas**

The Councillors are of the opinion that the Strategic Settlement Policy should not contain a restriction as regards an applicant's 'first' home. There are many people emigrating and, if they purchase a home in an alternative location before they need to return to live in rural Sligo, this restriction can prohibit them from qualifying for a house.

The submission requests that consideration be given to people that return to take up farming on the retirement of a parent, need to live close to a parent or family member to look after them, or change jobs to a rural-based enterprise.

It is submitted that if an applicant is meeting the essential criteria as requiring a home at this location they should not be restricted if they formally owned a home elsewhere.

### **Response**

The reference to a first home in policies SP-S-9 and SP-S-11 relates to a first home built in that area (SP-S-9) or landholding (SP-S-11) as opposed to the first home anywhere. Accordingly, the restriction does not apply.

**No change to the Draft Plan is required.**

## **Issue 8 – Section 6.5, Strategic Housing Policy SP-HOU-1**

The Draft Plan encourages a balanced supply of housing in the county, in a manner that is consistent with the Core Strategy and the Settlement Hierarchy, and which will support the creation of sustainable communities through the provision of an appropriate range of house types and high-quality residential environments.

However, the submission argues that it is not possible to provide a range of houses if there is little or no land zoned for residential development in the rural villages and towns.

### **Response**

As indicated above, the population and housing allocations under the Core Strategy, and the corresponding amounts of land zoned for residential development, have been confirmed by the OPR as being appropriate. The amounts of land proposed to be zoned for residential uses in each urban settlement are in fact higher than the area necessary to realise the full housing allocation.

**No change to the Draft Plan is required.**

## **Issue 9 – SP-ED-1 Strategic policy for economic development**

This policy seeks to ensure that sufficient, serviced and suitable land is reserved for new enterprise development at key locations in Sligo Town, Tobercurry, Ballymote and Enniscrone, and promote the Support Towns as secondary employment centres, after Sligo Town.

The submission states that there are lands zoned for enterprise development in all mentioned areas with the exception of Enniscrone.

### **Response**

While the main industry in Enniscrone is tourism which can be accommodated in the mixed use zoning, there is a need to identify some lands for the provision of enterprise related development.

### **Recommendation**

**CE-13Z-07** In **Chapter 13 Enniscrone Town Plan**, on the **Zoning Map**, rezone a portion of land to the rear of Sligo County Council's Area Office for **BIE** as shown on the CE-Recommended Zoning Amendments Map for Enniscrone.

## **Issue 10 – Buildings of Note**

The submission questions the inclusion of 'Buildings of Note' within the Draft Plan. It is argued that they have no legal status under planning legislation and therefore should not be included in the Plan.

### **Response**

Section 10.2.2 of the Draft Plan clarifies that Buildings of Note, while not enjoying the legal status afforded to a Protected Structure, are still worthy of retention and refurbishment, because they contribute positively to the streetscapes of Sligo's towns and villages.

It is noted that the OPR has welcomed the inclusion of Buildings of Note in the Draft Plan as part of the policies and objectives designed to protect the County's built heritage.

**No change to the Draft Plan is required.**

## **Issue 11 – Comments regarding 'Urban Development Zoning Plans'**

The submission considers that insufficient lands have been zoned in several of the village plans to support the growth potential of these settlements.

### **Response**

The amounts of land zoned for residential development in each settlement are proportional to the housing allocations under the Core Strategy.

Section 10.5.2 Strategic Land Reserve (Volume 2 of the Draft Plan) indicates that in case of faster-than-expected growth on zoned lands within a settlement, the Council will consider releasing lands from the Strategic Land Reserve using the development plan variation procedure. This provision is supported by SLR policies P-SLR-1 to P-SLR-4.

The same procedure could be used for zoning additional lands in settlements without SLR, provided there is factual evidence that such lands have become fully serviced and can deliver the targeted residential development within the lifetime of the Plan.

**No change to the Draft Plan is required.**

## **Issue 12 – Volume 3 General Policies**

The submission requests that the Landscape Characterisation map detail the exact line of the changes between various landscape designations to provide clarity for everybody i.e. where the area under urban influence changes to normal rural landscape and so forth.

### **Response**

The Landscape Characterisation Map does not illustrate the rural areas under urban influence. Rural settlement policy areas are shown on the Core Strategy Map.

However, as acknowledged in response to Issue 1 above, there is a need to prepare an interactive web-based map for the County, which will display all such designations on various layers.

The current Landscape Characterisation Map will be replaced as soon as a **revised Landscape Character Assessment** is prepared in conjunction with a **Renewable Energy Strategy** – refer to the Chief Executive's recommendation **CE-23-01** in response to the OPR's submission 184.

**No change to the Draft Plan is required.**

## **Issue 13 – P-VH-7 Vernacular heritage policy**

The Draft plan recommends the retention of surviving historic plot sizes and street patterns in the villages and towns of Sligo, and incorporation of ancient boundaries or layouts, such as burgage plots and town/and boundaries, into any redevelopments. The submission considers that this proposal conflicts with the combined approach needed to develop sites at the rear of existing streetscapes.

### **Response**

The concern is noted. The policy – which has been recommended by the Development Applications Unit (Archaeology Division) of the DHLGH – does not seek to prevent consolidated backland development. Its purpose is to encourage applicants to retain historic features present on site and incorporate them into any new development/redevelopment.

**No change to the Draft Plan is required.**

## **Issue 14 – Chapter 26 Residential development**

The submission raises concerns about some aspects of the policies included in the draft plan in relation to design and layout of new housing developments, e.g. housing mix, house types, circulation etc.

### **Response**

The policies set out under Chapter 26 are required to comply with current Government Planning guidelines (e.g. Sustainable Residential Development in Urban Areas) and respond to changing demographic trends (e.g. over 25% of households in County Sligo are one person households).

**No change to the Draft Plan is required.**

## **Issue 15 – Vacant housing policy P-VHOU-1**

The submission suggests that the wording of this policy should reflect the Vacant Property Refurbishment Grant, which is a grant payment you can get if you are turning a vacant house **or building** into your permanent home or a rental property. The wording of the policy should support renovation of all vacant houses and buildings subject to normal planning considerations.

### **Response**

This is Draft Plan policy relates to vacant dwellings only, without trying to reflect the qualifying criteria of funding schemes that may change or be terminated over the life of the Development Plan.

**No change to the Draft Plan is required.**

## Issue 16 – P-BIE-1 – Business, Industry and Enterprise

The submission argues that the BIE policies are not reflected on the zoning plans for the villages and towns. For example, the submission states *'that there is no site in Enniscrone zoned for Business, Industrial and Enterprise, the rural villages and towns will die if we have no employment in them'*.

### Response

The response to Issue 9 above addresses the lack of a site zoned BIE in Enniscrone.

Regarding smaller villages without BIE zoning, the Zoning Matrix in Chapter 10 (Volume 2) indicates that many types of business and enterprise centres/units are either normally permitted or open to consideration on lands zoned RV (Rural Village).

**No change to the Draft Plan is required.**

## Issue 17 – Section 28.2.4 Mineral extraction and quarries

The submission considers that the most appropriate use of former quarried areas is agriculture, when topsoil is reinstated in accordance with a detailed reinstatement plan for the area.

### Response

Noted and, while the wording does indicate that other uses will be considered, the inclusion of a reference to agriculture is appropriate.

### Recommendation

**CE-28-04** In **Section 28.2.4 Mineral Extraction and quarries** (Chapter 28 Economic Development), amend **policy P-MEQ-2** as follows:

**P-MEQ-2** Seek the reuse of worked out quarries for recreational, industrial, ecological, **agricultural** and other uses, following appropriate restoration.

## Issue 18 – 33.4.4 Site boundaries

With regard to the setback of site boundaries, the submission states that *'these verges are often the only location on which cars and vehicles can meet and pass on many of the country roads, in many cases the set backs in front of the houses are critical for the Local Authority to avail of passing bays without having to acquire lands to maintain the roads adequate for current road user standards and safety needs.'*

### Response

Noted and agreed.

### Recommendation

**CE-33-15** In **Section 33.4.4 Site boundaries** (Chapter 33 Development Management Standards), amend the text by **deleting the last sentence of the fourth bullet point** – see next page

- Where a roadside boundary has to be set back to achieve sightlines, it should be reconstructed behind the required set back or replaced with a boundary which reflects the prevalent traditional field boundary in the area. This could take the form of a new hedgerow, a grassed bank or a dry-stone wall. **The area between the road and the new boundary shall be left as a grass verge.**

## **Issue 19 – Table 33.5 Guide to designing a house in the rural vernacular style**

The submission outlines several issues with regard to the application of the guidance set out in Table 33.5.

### **Response**

The observations are noted. As specified in the first paragraph of Section 33.4.3, “new rural housing designed in the traditional style should have regard to the **principles** of vernacular rural design”. Therefore, the guidance contained in Table 33.5, relating to “vernacular style” rural houses, has an advisory function and is not mandatory.

**No change to the Draft Plan is required.**

## **Issue 20 – Section 33.7.7 Burial grounds and crematoria**

The submission notes that while proposals for burial grounds should address traffic impact and parking, these proposals are not included in the zoning plans for the villages and towns.

### **Response**

The Draft Plan does not contain specific proposals for new burial grounds in settlements. Within the development limits of towns and villages, such uses would be normally permitted on lands zoned for ‘community facilities’ or ‘rural village’. Any development proposals would be required to comply with relevant development management standards, including parking provisions and traffic impact assessments where necessary.

**No change to the Draft Plan is required.**

## **Issue 21 – 33.8 Advertising**

Under Table 33.7, the submission notes that signs on road verges and on private property advertising commercial goods will not be permitted. The submission states that ‘*commercial business require signage*’.

### **Response**

It is acknowledged that signage is required to advertise businesses and reference is made to the fact that, subject to size restrictions, it is possible to erect such signage without the necessity for planning permission.

**No change to the Draft Plan is required.**

## **Issue 22 – Table 33.10 Car parking standards**

The submission considers that there are some areas in the car parking standards that are not justified. The car parking standards at schools should be restricted to new schools only, as existing schools mostly have insufficient space to meet current parking standards and unreasonable standards could prevent development of existing school facilities.

### **Response**

The car parking standards set out in Table 33.10 relate to new developments, not to existing ones.

The second paragraph in **Section 33.9.7 Car parking requirements** indicates that there will be a degree of flexibility in determining the parking requirements for new developments: "In circumstances where a deviation from the standards is proposed, the applicant shall submit details of the predicted parking requirements associated with the proposed development and the capacity of the proposed on-site provision to accommodate this demand" (p. 179 in Chapter 33, Volume 3).

**No change to the Draft Plan is required.**

# Submission 156

## Councillor Joe Queenan

<https://consult.sligococo.ie/en/submission/slg-c29-156>

### Summary of issues

The submission contends that insufficient lands have been zoned within Enniscrone to accommodate the current housing demands in the area. A number of alternative locations for the provision of new residential development are suggested:

- northern and eastern side of the local road linking R297 with the Coast Road;
- area south of the Castlecove estate;
- area to the southern end of the Church Lane.

### Response

A sufficient amount of land has been zoned for new residential (nRES) and mixed uses (MIX) within the draft Enniscrone Town Plan to accommodate the required housing allocation detailed in Core Strategy Table (Table 3.2 in Chapter 3) of the Draft County Development Plan.

The number of housing units will meet the needs of the allocated population growth for Enniscrone over the Plan period, 2024-2030.

It is noted that in response to a number submissions which made site-specific rezoning requests, **additional lands are proposed to be zoned for residential development** within the Enniscrone Town Plan – refer to the CE-recommended Zoning Amendments Map for Enniscrone.

**No further changes to the Draft Plan are required.**

## Submission 180

### Councillor Donal Gilroy

<https://consult.sligococo.ie/en/submission/slg-c29-180>

#### Issue 1 – Volume 1: Settlement Structure and Support Towns

The submission questions the designation of three Support Towns in the south of the county without a support town in the north of the county or in the Rural Areas Under Urban Influence. A village in the north of the county should be considered as an area where growth will be managed to develop into a town of substance. This should be built into the County Development plan so that the required infrastructure is in place to be classified as a support town in the next CDP. Strandhill could also be classified as a support town rather than being viewed more of a suburb of the Sligo Regional Growth Center (RGC).

#### Response

As outlined in Section 5.3.2 of the Draft Plan, the designation of “Support Towns” applies to self-sustaining urban centres capable of supporting the County’s social and economic growth **outside** Sligo Town.

Villages located within the rural area under the influence of Sligo Town are not self-sustaining, as the majority of jobs and services are located in the main urban area/Regional Growth Centre.

The “Support Town” designation simply acknowledges the roles and functions of the County’s second-tier towns, within a remarkably stable Settlement Hierarchy, which has been recognised as such in previous County Development Plans since 2005.

Table 5.6 in Section 5.4.1 (p. 39 of the Draft Plan) illustrates the extraordinary growth of the Satellite Villages between 2002 and 2022: a near-doubling of population in Strandhill and Ballysadare, near-tripling of population in Collooney. During the same period, Sligo Town has grown by less than 5%.

Promoting further growth within Strandhill, Collooney, Ballysadare or any other village within the area under the strong influence of Sligo Town – regardless of their designation under the Settlement Hierarchy – would severely undermine the future development of Sligo Regional Growth Centre.

**No change to the Draft Plan is required.**

#### Issue 2 – Section 5.2 - Population target for Sligo RGC

The submission considered that the population targets for the Regional Growth Centre are set too low. The draft Plan proposes to plan for a population target for Sligo that is significantly below that specified in the RSES population *minimum* target, i.e. it is proposed to set a population target of 23,800 instead of the minimum target of 25,360. The plan should be revised to this higher level.

#### Response

The Chief Executive has already addressed the Sligo Town population target as part of the response to the OPR Submission 184/Issue 2.C, recommending the updating of the population target in the Core Strategy Table).

**No further change to the Draft Plan is required.**

## Issue 3 – RPO 5.3 – National Parks / National Recreational Areas

The Draft County Development plan does not appear to include any reference to Regional Planning Objective RPO 5.3 from the RSES to consider (i) North Sligo/North Leitrim (Benbulbin and its hinterland); and (ii) The area surrounding and including Lough Arrow/Lough Key as potential National Parks/National Recreation Areas.

### Response

Noted and agreed. While the designation of National Parks is outside the remit of the Local Authority, there is no objection to including an objective in Chapter 23 Landscape Character in relation to RPO 5.3.

### Recommendation

**CE-23-02** In **Chapter 23 Landscape Character**, include an additional **objective** as follows:

- O-LCP-4** Investigate the feasibility and potential of North Sligo (Benbulbin and its hinterland) and Lough Arrow as National Parks / National Recreation Areas in conjunction with the National Parks and Wildlife Service (NPWS) and other relevant stakeholders.

## Issue 4 – RPO 3.7 – Provision of serviced sites

The village plans seem to have little or no change from the 2017 Plan and indeed in many cases from the 2011 Plan. Despite the needs for the RGC to grow, the villages are a very important part of the sustainability of our communities. The Plan should provide detail, including timelines, in prioritising a programme for the provision of serviced sites within smaller towns and villages to ensure the plan is consistent with RPO 3.7 of the RSES.

### Response

The Draft Plan provides for the zoning of serviced lands within 27 villages. There has been limited new residential development in most of these villages for several years. The introduction of the Residential Zoned Land Tax (RZLT) provisions together with the implementation of a programme for the provision of serviced sites (as specified in RPO 3.7 and the Ready-to-Build Scheme) will stimulate the delivery of new houses in these rural villages.

In response to Issue 3 of the NWRA Submission 103, the Chief Executive has recommended the inclusion of a new strategic housing objective to support the implementation of the Ready-to-Build Scheme.

**No further change to the Draft Plan is required.**

## Issue 5 – Renewable Energy Strategy

A notable omission from the Draft Plan is the lack of any detail in respect of a Renewable Energy Strategy for the County. The recent Climate Action Plan, and Action 102 therein, set out the need to significantly scale up the provision of onshore renewable energy across the Country. There appears to be no such Renewable Energy Strategy for Sligo. The submission states that '*perhaps climate change is not an issue Sligo needs to plan for*'.

## Response

Climate action is, and has been for several years, a significant priority for Sligo County Council, which adopted the first Climate Adaptation Strategy in 2019. Chapter 2 of the Draft Plan is devoted to Climate Action and explains how many of the policies and objectives of the plan have been designed to promote the achievement of national targets, either by mitigating the impacts of climate change or through adaptation to its adverse impacts.

Chapter 31 Energy and Telecommunications (Volume 3 of the Draft Plan) includes a substantial section (31.1) on renewable energy, addressing mainly wind energy developments, but also other forms of renewables. Section 31.2. 2 indicates Sligo County Council's commitment to preparing a Renewable Energy Strategy, as specified in Action 28 under Goal 3/Objective 3.1 of the Sligo 2030 Local Economic and Community Plan (LECP). This commitment is repeated in Section 31.3.1 Wind energy and translated into objective O-REN-1.

The timeframe for the preparation of the Renewable Energy Strategy is proposed to be updated as per the Chief Executive's recommendation in response to the OPR Submission 184/Issue 17.B.

**No further change to the Draft Plan is required.**

## Issue 6 – Landscape Characterisation Map

The submission considers that a new landscape characterisation and appraisal study should be in place before a new plan is adopted.

### Response

The current Landscape Characterisation Map will be replaced as soon as a **revised Landscape Character Assessment** is prepared in conjunction with a **Renewable Energy Strategy** – refer to the Chief Executive's recommendation in response to the OPR Submission 184/Issue 17.C.

**No further change to the Draft Plan is required.**

## Issue 7 – Provision of student accommodation

The submission recommends that the Plan is reviewed to confirm provision is made in future housing units and zoning for private-rented student accommodation to support the growth of ATU Sligo.

### Response

Private developments designed for rental as student accommodation can be provided on lands zoned for Residential and mixed uses. A specific restricted zoning objective is not considered necessary. However, in response to Issue 2 of the NWRA Submission 103, the Chief Executive has recommended the inclusion of an additional subsection supporting the provision of student accommodation.

**No change to the Draft Plan is required.**

## Issue 8 – Timeframe for the Eastern Garavogue Bridge

The Plan should be amended to include a timeframe for the completion of the Eastern Garavogue Bridge.

### Response

The Chief Executive has already addressed this issue as part of the response to the NWRA Submission 108/ Issue 4.

**No change to the Draft Plan is required.**

## Issue 9 – Areas for renewable energy development

The Plan should include modifications to Volume 3, which includes additional land-use clarification via mapping and associated policies which identify established areas / areas for repowering / potentially open to consideration / not favoured areas for renewable energy development.

### Response

Refer to the Chief Executive's response to Issue 5 of the NWRA Submission 103.

**No change to the Draft Plan is required.**

## Issue 10 – TEN-T Comprehensive Network

Chapter 9 of the Plan to be reviewed to include revised text on the completion of the necessary upgrades of the Ten-T Comprehensive Network.

### Response

Refer to the Chief Executive's response to Issue 13 of the NWRA Submission 103.

**No change to the Draft Plan is required.**

## Issue 11 – Review and Implementation Strategy

The Plan should incorporate the inclusion of a Review and Implementation Strategy for the Plan, which includes key performance indicators and timelines. All objectives should be accompanied by clear timelines, whether short, medium or long term.

### Response

The above observation is similar to the OPR's and NWRA's comments on Plan implementation and monitoring. In response to OPR's Submission 184/Observation 7, the Chief Executive has proposed the inclusion of an additional **Section 3.4 Monitoring the implementation of the Plan's objectives** in Chapter 3 Core Strategy Statement.

**No further change to the Draft Plan is required.**

## Issue 12 – Cliffony Village

The submission requests that the council liaise with landowners in Cliffony Village to develop a delivery plan that will ensure the provision of safe parking and set-down areas close to the primary school and off the N-15.

### Response

This is an operational matter, which does not need to be addressed in the Development Plan.

**No change to the Draft Plan is required.**

## Issue 13 – Scenic Routes

The submission requests that restrictions to developments in the vicinity of designated scenic routes be limited to developments within 250 m of the scenic route.

### Response

All applications along scenic routes are assessed on a case-by-case basis to determine the impact on available views from the scenic route. A blanket restriction is likely to negatively affect many more development proposals than the application of the current and proposed scenic route policy.

**No change to the Draft Plan is required.**

## Issue 14 – Rural housing policy

The submission recommends that the term “sons and daughters” of landowners within a Green Belt or rural area under urban influence should also include nearest relative/ nephews or nieces for landowners who have no children or who have children who do not intend to live near the landowner and offer support to aging landowners. The submission also requests *‘that all children within the family be treated equally regardless of who first applied to develop on the lands’*.

### Response

In practice, Sligo County Council have applied some flexibility to accommodate rural houses where a housing need has been demonstrated in circumstances similar to those outlined in the submission, e.g. a landowner who has no children. This discretion on a case-by-case basis will continue to be applied under the next County Development Plan.

With regard to treating all children within the family equally, the Planning Authority may not be in a position to give the same planning advice / decision to all family members because not all sites within the family landholding are the same, i.e. not all sites within the landholding will pass the site suitability test for an on-site treatment system, not all sites will have adequate sight lines etc.

**No change to the Draft Plan is required.**

## **Issue 15 – Western Rail Corridor**

The submission considers that the County development plan should include more detailed reference to the provision of increased Railway infrastructure to include a connection directly to Galway Metropolitan Area and the Northwest City Region (Letterkenny/Derry/Strabane).

### **Response**

Section 29.6.2 of Chapter 29 sets out the current position on the provision of railway infrastructure between Galway and Derry via Sligo, including references to the Draft All-Island Strategic Rail Review and information on options, as extracted from the associated Strategic Environmental Assessment Report.

**No change to the Draft Plan is required.**

## Section 9.

# Chief Executive's supplementary recommendations

Following internal consultation with relevant departments of the County Council, the Chief Executive has decided to recommend supplementary amendments, which complement those arising from submissions received from prescribed bodies and the public during the consultation period. These recommendations are grouped in this Section under the headings **Transport, Water Quality** and **Miscellaneous Issues**.

A further set of amendments was considered necessary on foot of the recently-published **Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities** (DHLGH, January 2024).

## 9.1 Supplementary recommendations on Transport

**CE-07-02** In **Chapter 7 Economic Strategy**, modify the **third paragraph in Section 7.1.2** as follows:

Particularly relevant provisions for Sligo are contained in RPO 5.11 – supporting the upgrading of cultural facilities in Regional Growth Towns, and RPO 5.18 – development of regional greenway projects, such as the SLNCR (Sligo-Leitrim-Northern Counties Railway) Greenway and the Sligo Greenway (Collooney to Bellaghy)

**CE-07-03** In **Chapter 7 Economic Strategy**, modify the list in the **third paragraph of Section 7.1.3** as follows:

The RSES supports the following ongoing road projects in County Sligo:

- National roads: N-17 Knock to Collooney (realignment), N-59 Sligo to Ballina (upgrade) – RPOs 6.7 and 6.8; N-15 Sligo to Bundoran (Sligo to County Boundary) and N-16 Sligo to Blacklion (N-16 Sligo to County Boundary) – RPO 6.8;
- The East-West (Dundalk to Sligo) Road will be pursued incrementally in the short and medium term, to be delivered to an appropriate level of service – RPO 6.10;
- Regional and local roads: Eastern Garavogue Bridge and Approach Roads Scheme – RPO 6.9.

**CE-07-04** In **Chapter 7, Section 7.1.3** modify the **fourth paragraph** as follows:

“Potential Investment in Sligo’s rail network is addressed in RPOs 6.11 (relating to the review of Western Rail Corridor); RPO 6.13 (relating to the upgrading and extension of railway from Athenry to Sligo) and RPOs 6.15 and 6.16 (enhance and expand relating to the feasibility of extending the Dublin-Sligo railway towards the north-west)”

**CE-08-01** In **Chapter 8 Retail Strategy, Section 8.3**, omit **Ballinafad** and **Castlebaldwin** from the list of **Tier 5 Rural village stores**.

**CE-09-02** In **Chapter 9 Transport strategy**, modify the **first sentence of the second paragraph** as follows:

Sligo Town is the convergence point of strategic transport corridors, connecting to Dublin, Galway and Letterkenny/Derry and Enniskillen/Belfast.

**CE-09-03** In **Chapter 9, Section 9.2**, modify the **list in the second paragraph** as follows:

- N4 Collooney to Castlebaldwin (RPO 6.6 - Completed in 2021)
- N-17 Knock to Collooney (RPO 6.7)
- N-15 Sligo to Bundoran, **N-16 Sligo to Blacklion and N-59 upgrade** (RPO 6.8)
- **N-16 Sligo to Blacklion** (RPO 6.8)
- **N-59 upgrade** (RPO 6.8)
- Garavogue Bridge and Approach Roads Scheme (RPO 6.9)
- The East-West Road, Dundalk to Sligo via Enniskillen (RPO 6.10)

**CE-11-01** In **Chapter 11 Sligo Town, Section 11.3.1 Transport and mobility**, amend the strategic objective **SO-UR-1** as follows:

**SO-UR-1** **Continue the upgrading and realignment of the N4/N15 from Hughes Bridge northwards to the County Boundary.**

**CE-11-02** In **Chapter 11 Sligo Town, Section 11.3.1 Transport and mobility**, amend the strategic objective **SO-UR-2** as follows:

**SO-UR-2** Complete the Eastern Garavogue Bridge and Approach Roads scheme **during the life of the CDP 2024-2030.**

**CE-14-01** In **Chapter 14 Tobercurry Town Plan, Section 14.1.4 Transport and mobility**, amend the **second paragraph** under the heading **National Road N-17 (Sligo to Galway)** as follows:

**Transport Infrastructure Ireland (TII) has approved the construction of a bypass for Tobercurry** As part of a comprehensive realignment of the N-17, **The an** emerging Preferred Transport Corridor **was** identified in February 2023. **This corridor bypasses Tobercurry on its western side and** no longer dissects the built-up area. **of Tobercurry**

**CE-14-02** In **Chapter 14 Tobercurry Town Plan, Section 14.4 Specific development objectives**, include an additional **Transport and circulation objective** as follows:

**Sligo Greenway**

**TY-TCO-11** Ensure that development does not interfere with any route corridor option / preferred route corridor for the Sligo Greenway (Collooney to Bellaghy), when selected.

**CE-15-02** In Chapter 15 Ballysadare Village Plan, Section 15.3.3 Transport, circulation and parking, include an additional objective as follows:

- G. Seek to improve the active travel facilities along the national primary route N59 within the 60kph extents of the village”.

**CE-15-01** In Chapter 15 Ballysadare Village Plan, Section 15.1 Village profile, include the following additional text in the Village Assets table, under the heading Social infrastructure – other assets:

Playground, a viewing platform and walkway along the river, Avena leisure centre, post office, several crèches, new burial ground, outdoor recreational routes such as the Union Rock, Oakwood and Mountain Access trails and their connection to the Sligo Way.

**CE-16-02** In Chapter 16 Collooney Village Plan, Section 16.1 Village profile, include the following additional text in the Village Assets table, under the heading Social infrastructure – other assets:

Health centre, ball alley, crèches, post office, burial ground, outdoor recreational routes such as the Union Rock, Oakwood and Mountain Access trails and their connection to the Sligo Way.

**CE-16-03** In Chapter 16 Collooney Village Plan, Section 16.3.3 Transport, circulation and parking, include an additional objective G (re-numbering existing G as objective H) as follows:

- G. Ensure that development does not interfere with any route corridor option / preferred route corridor for the Sligo Greenway (Collooney to Bellaghy), the SLNCR Greenway and any route required to connect these greenways, when selected”.

**CE-18-01** In Chapter 18 Grange Village Plan, Section 18.3.3 Transport and circulation, amend objective B as follows:

- B. Ensure that development does not interfere with the preferred route corridor for the N-15 (Sligo to County Boundary Realignment) and its associated link to the east of the village.

**CE-18-03** In Chapter 18 Grange Village Plan, Section 18.3.3 Transport and circulation, include an additional objective D as follows:

- D. Provide a segregated (where feasible) active travel facility and designated crossing points in Grange village. Portions of the active travel facility will be required to be provided in conjunction with any development of adjoining lands.

**CE-29-01** In Chapter 29 Transport infrastructure, Section 29.1 Road network, modify the last sentence in the third paragraph (relating to Sligo Regional Design Office) under the heading Funding and oversight as follows:

In 2022, the office also took over assumed responsibility for the delivery of pavement renewal schemes (PARR) and safety schemes on National Roads.

**CE-29-04** In **Chapter 29 Transport infrastructure**, correct the wording of **objective O-NR-1** as follows:

**O-NR-1** Undertake programmed improvements to the national road network, including the programme of realignments and upgrades, as set out in Table 29.B 29.2 and subject to compliance with legislative requirements.

**CE-29-05** In **Chapter 29 Transport infrastructure**, modify the **N-16** row/entry in **Table 29.2** as follows:

<b>N-16</b>	Sligo to Leitrim County boundary: - Sligo to Drumkilsellagh - Lugatober (Drumkilsellagh to Lugnagall) - Gortnagrelly Realignment	Realignment / upgrading / online improvements: - early planning stages (2024) - at construction stage (2024) - envisaged to commence planning during the life of the CDP	Part ongoing (2024)
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**CE-29-07** In **Chapter 29 Transport infrastructure, Section 29.4 Active travel infrastructure**, modify the wording of the second paragraph as follows:

Sligo County Council established a dedicated Active Travel Team for the **Regional and Local network** in 2022 and has received funding for works such as improved footpaths, pedestrian crossings and cycle parking facilities.

**CE-29-08** In **Chapter 29 Transport infrastructure, Section 29.4 Active travel infrastructure**, replace the last paragraph with the following:

In addition to the above, in 2023 Sligo Regional Design Office was advancing two Active Travel projects funded by the TII, associated with the national road N-4:

1. N-4 Collooney to Castlebaldwin Active Travel Scheme,
2. N-4 Collooney to Toberbride Active Travel Scheme.

In addition to the above, an Active Travel Team was setup in 2023 in the Sligo Regional Design Office, with the objective of improving, upgrading and providing new active travel facilities on the national road network. This Team is currently (2024) advancing a number of projects such as:

- N-4 Collooney to Castlebaldwin Active Travel Scheme
- N-4 Collooney to Toberbride Active Travel Scheme
- N-4/N-16 Sligo Urban Active Travel Scheme

Further active travel projects are proposed in the future (subject to staff and funding resources) in villages located on the national road network, such as the following:

- N-15 Grange Active Travel Scheme
- N-59 Ballysadare Active Travel Scheme
- N-17 Curry Active Travel Scheme

Active Travel projects are also being advanced as part of major and minor national road realignment projects such as the N-15, the N-17, the N-16, the N-4 and the N-59.

**CE-29-09** In **Chapter 29 Transport infrastructure, Section 29.4.3 Greenways**, modify the **first bullet point in the second paragraph** as follows:

- **The Sligo-Leitrim-Northern Counties Railway (SLNCR) Greenway - Collooney to Enniskillen**, managed by Leitrim County Council through Section 85 agreements with **other local authorities in Ireland** **Sligo County Council and Cavan County Council**, and a Memorandum of Understanding with Fermanagh and Omagh District Council.

**CE-29-10** In **Chapter 29 Transport infrastructure**, insert the following note under **Figure 29.A (Extent of the inter-urban cycle network envisaged by the LTP)**:

**Note:** The lines shown for Greenways are indicative only, as no route had been selected at the time of preparation of the Development Plan. It is proposed to link the Sligo Greenway (Collooney to Bellaghy, which is outside the LTP study area) to the SLNCR in Collooney, to further enhance the active travel opportunities available to cyclists and pedestrians, and to offer a possible alternative commuter connection.

**CE-29-15** In **Chapter 29 Transport infrastructure, Section 29.4 Active travel**, include three additional **Cycling and walking objectives** under the heading **Active travel along national roads** as follows:

**Active travel along national roads**

- O-CW-5** Complete the development of the N4/N16 Active Travel Scheme from the N4 Caltragh Interchange to the N16 Abbie Roundabout.
- O-CW-6** Complete the development of active travel facilities through villages of Grange, Ballysadare and Curry.
- O-CW-7** Complete the development of active travel facilities which form part of major and minor national road realignment projects on the N17, N16, N15 and N59.

**CE-29-16** In **Chapter 29 Transport infrastructure, Section 29.6 Public transport**, include an additional public transport policy as follows:

- P-PT-8** Continue to seek to improve the road network to allow for the provision of a higher-quality, reliable bus service, together with enhanced connections to the railway stations in Sligo, Collooney and Ballymote.

**CE-33-17** In **Chapter 33 Development management standards, Section 33.9.1 Access onto national roads**, modify the **first paragraph** under the heading **Sight distances for access onto national roads** as follows:

Where direct vehicular access onto national primary roads cannot be avoided, a Departure from TII Publications Standards DN-GEO-03060 with justification shall be required.

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

**CE-33-18** In Chapter 33 Development management standards, Section 33.9.3 Road and traffic assessments, modify the second bullet point as follows:

- a **Road Safety Audit** (RSA), in accordance with the *Design Manual for Roads and Bridges TII Publication Standards* and Department of Transport guidelines;

**CE-42-01** In Chapter 42 Castlebaldwin Village Plan, Section 42.1 Village profile, modify the second sentence as follows:

The new *N-4 Collooney to Castlebaldwin* realigned route, to the east of the village, was officially opened in **2022 2021**.

**CE-46-01** In Chapter 46 Curry Village Plan, Section 46.2.2 Transport and circulation, amend objective B as follows:

- B. Seek the improvement of **pedestrian links across Active Travel facilities along** the N-17 **national primary road within Curry village, possibly by providing a pedestrian walkway at the N-17 bridge, subject to Habitats Directive Assessment.**

**CE-46-02** In Chapter 46 Curry Village Plan, Section 46.2.3 Village centre, amend objective A as follows:

- A. Any development or redevelopment proposal on lands between the Main Street and the N-17 should be designed to provide an appropriate aspect when viewed from the N-17. Substantial proposals for landscaping and boundary treatment along the national road should also be incorporated into any such proposal, **taking account of TII Design Standards regarding clear zone and forgiving roadsides (currently Design Note DN-GEO-03036).**

## 9.2 Supplementary recommendations on Water Quality

**CE-24-02** In Chapter 24 Natural heritage, Section 24.6.1 Water Framework Directive, modify the percentages in the last two paragraphs as follows:

In terms of river water quality in County Sligo and based on monitoring carried out for the period 2013-2018, 16% of rivers are classified at **high** status, 54% are at **good** status, 18% are at **moderate** status and 11% are classified at **poor** status.

2016-2021, 18% of rivers are classified at **high** status, 48% are at **good** status, 23% are at **moderate** status and 11% are classified at **poor** status.

Among the County's lakes, 15% are classified at **high** status, 23% are at **good** status, 23% at **moderate** status, with 8% classified at **bad** status.

Among the County's lakes, 15% are classified at **high** status, 38% are at **good** status, 31% at **moderate** status, with 8% classified at poor and 8% at bad status.

In 2022, 31% of lakes within the County did not have an official status classification. Unassigned water bodies will gradually receive a status classification as the national monitoring programme is expanded.

**CE-24-03** In Chapter 24 Natural heritage, Section 24.6.3 Quality of estuarine and coastal waters, modify the text as follows:

### 24.6.3 Quality of estuarine and coastal waters

Sligo County Council must ensure that planning and development policies take due account of the provisions of the WFD and water quality protection measures detailed in the National River Basin District Management Plan and the European Communities (Quality of Shellfish Waters) Regulations 2006 in order to maintain the existing water quality status in estuarine and coastal waters.

The principal estuarine, transitional, and coastal waters which may be impacted by the plan include Sligo, Drumcliff and Ballysadare Bays and their respective estuaries. Killala Bay also borders the western perimeter of County Sligo.

The EPA data for the monitoring period 2013-2018 indicate that the Garavogue and Ballysadare Estuaries are classified at **moderate** status, Drumcliff and Easky Estuaries are classified at **high** status, while Portavaud West did not have an assigned status. 2016-2021 indicate that the Garavogue, Moy, and Ballysadare Estuaries are classified at **moderate** status, Easky Estuary is classified at Good Status, while Drumcliff does not have an assigned status at the present time.

Sligo Bay and Killala Bay are classified at **good** status, while Donegal Bay Southern is classified at **high** status.

Sligo Bay is currently classified at Moderate status, while Killala Bay and Donegal Bay Southern are classified at good status and **high** status respectively.

In general, 33% of transitional waters are classified at **high** status, 50% at **moderate** status and 17% do not have an official status assigned. In terms of coastal water quality, 33% of waters are classified at **high** status, 33% are classified at **good** status and 33% do not have an official status assigned.

In general terms, 17% of transitional waters are classified at good status, 50% at **moderate** status and 33% do not have an official status assigned at the present time. In terms of coastal water quality, 33% of waters are classified at **high** status, and 67% are classified at moderate status.

Drumcliff Bay and Sligo Bay are designated as shellfish waters in accordance with the European Communities (Quality of Shellfish Waters) Regulations 2006 (implemented as S.I. No. 268 of 2006), but policies for the protection of shellfish waters are now incorporated into the RBMP.

**CE-24-04** In Chapter 24 Natural heritage, Section 24.6.4 Quality of estuarine and coastal waters, modify the first two paragraphs as follows:

#### 24.6.4 River water quality

The ongoing national water quality monitoring programme (for rivers, lakes, groundwater, transitional waters and coastal waters) is undertaken jointly by the EPA and local authorities with additional input from a range of **other** state agencies. The EPA sampling programme is generally carried out over a three-year cycle with associated publication of updated water quality status information.

The Environmental protection Agency is the designated body under national water policy regulations for assigning water quality status to waters. The most recent EPA published data on river water quality in County Sligo relates to the period **2013 -2018** **2016 -2021**. The report indicates ... etc.

**CE-24-05** In Chapter 24 Natural heritage, Section 24.6.5 Lake water quality, modify the second paragraph as follows:

#### 24.6.5 Lake water quality

....

Based on 2013-2018 monitoring data, Glencar Lake, Lough Gara, Lough Arrow and Lough Gill are classified at **moderate** status. Lough Talt and Lough Easkey are classified at **good** status. Templehouse Lake is classified at **bad** status while Lough Dargan, Lough Labe and Cloonacleigha Lough have no status assigned.

Based on 2016-2021 monitoring data, Glencar Lake, Lough Arrow, Lough Easkey and Lough Talt are classified at good status. Lough Gara, Clooncleigha Lough, Lough Labe, and Lough Dargan are classified at moderate status, while Templehouse Lake and Lough Gill are classified at **bad** status and poor status respectively.

**CE-24-06** In Chapter 24 Natural heritage, Section 24.6.5 Lake water quality, modify the Table 24.1 as follows:

**Table 24.1 Status of WFD-monitored lakes in County Sligo**

Lake	2013-2018 2016-2021 physio-chemical status	2013-2018 2016-2021 ecological status
Arrow	<i>good</i>	<i>Moderate good</i>
Easky	<i>Good high</i>	<i>good</i>
Gara	<i>moderate</i>	<i>moderate</i>
Gill	<i>good</i>	<i>Moderate poor</i>
Kilsellagh	<i>Good high</i>	<i>good</i>
Talt	<i>Good high</i>	<i>good</i>
Templehouse	<i>Good moderate</i>	<i>bad</i>

Source: EDEN (EPA's Environmental Data Exchange Network, <https://wfd.edenireland.ie/data>)

**CE-24-07** In Chapter 24 Natural heritage, Section 24.6.6 Lake water quality, modify the second and fourth paragraphs as follows:

## 24.6.6 Groundwater quality

...

Discharges to groundwater are subject to the European Communities (EC) Environmental Objectives (Groundwater) Regulations, which were transposed into Irish Law as Statutory Instrument No. 9 of 2010 (S.I. No. 9 of 2010). Under Regulation 4 of the Groundwater Regulations, a duty is placed on public authorities to promote compliance with the requirements of the regulations and to take all reasonable steps to prevent or limit the input of pollutants into groundwater and prevent the deterioration of the status of all bodies of groundwater. [Further amendments to the above regulations have been made under S.I. no. 389 of 2011, S.I. no. 149 of 2012 and S.I. no. 366 of 2016.](#)

...

In the most recent groundwater assessment issued by the Environmental Protection Agency, based on data recorded during the period 2013-2018 2016-2021, all groundwater within County Sligo is classified at **good** status, which must be protected and maintained by the Council.

**CE-24-08** In **Chapter 24 Natural heritage, Section 24.6.7 Blue Dot Catchments Programme**, modify the first paragraph as follows:

### 24.6.7 Blue Dot Catchments Programme

One of the key measures of the RBMP 2018-2021 [and in the National River Basin Management Plan 2022-2027](#) is the setting up of the Blue Dot Catchments Programme to address the decline in **high** status water bodies. This is meant to ensure ... etc.

**CE-30-11** In **Chapter 30 Water infrastructure**, include an additional **Wastewater treatment policy** as follows:

**P-WWT-6** Where it is proposed to discharge domestic effluent from multi-unit residential developments to the Uisce Éireann sewerage network via a wastewater pumping station, the applicant will be required to demonstrate that adequate measures will be established for the ongoing routine maintenance and repair, management, alarm response, caretaking procedures, and desludging of wastewater pumping infrastructure, until such time as the infrastructure is formally taken in charge by Sligo County Council or Uisce Éireann.

Sligo County Council reserves the right to apply a specific cash bond to address any potential financial outlay by the Local Authority in terms of protection of public health and the mitigation of water pollution.

## 9.3 Supplementary recommendations arising from the *Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities* (2024)

In January 2024, the Ministerial Planning Guidelines issued under Section 28 of the Planning and Development Act 2000 (as amended) in 2009 entitled '*Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities*' were revoked and replaced by the '**Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities**' (SRDCS Guidelines)

The DHLGH-issued Circular Letter NRUP 02-2024 (dated 12 January 2024) requests planning authorities to "review statutory development plans in force for their functional area as soon as possible" and to "form a view as to whether the plan is materially consistent with the policies and objectives (including SPPRs) of the Guidelines".

Where a planning authority "is of the view that there is a material inconsistency", the Circular Letter recommends a variation of the development plan "so as to remove the material inconsistency".

Given that the process of preparing a new development plan is at a stage where amendments can be proposed, the Chief Executive recommends several amendments designed to ensure consistency between the future CDP 2024-2030 and the SRDCS Guidelines.

### Compliance with SPPRs

Planning authorities are required to have regard to the policies and objectives contained in Section 28 guidelines and to apply the **specific planning policy requirements** (SPPR) contained in such guidelines when preparing and making a development plan.

The Guidelines contain four SPPRs, which are addressed as follows:

#### ■ SPPR 1 - Separation Distances

It is proposed to amend **Section 33.3.5 Distance between dwellings** by replacing the requirement for "about 22 m between the rear of two-storey dwellings" with "at least 16 metres between opposing windows serving habitable rooms at the rear or side of houses, duplex units and apartment units, above ground floor" – refer to **CE-33-08**.

#### ■ SPPR 2 - Minimum Private Open Space Standards for Houses

It is proposed to amend **Section 33.3.8 Private open space by decreasing the minimum net garden size requirement from 60 m<sup>2</sup> to 40 m<sup>2</sup>** (for houses with up to 3 bedrooms) and from **75 m<sup>2</sup> to 50 m<sup>2</sup>** (for houses with 4 or more bedrooms) – refer to **CE-33-10**

It should be noted that these are **minimum requirements**, and that **there is no upper limit** to the size of a rear garden of a house.

#### ■ SPPR 3 - Car Parking

Some clarifications are proposed to the text of **Section 33.3.11 Parking standards for housing developments** (refer to **CE-33-13**) and **Section 33.9.7 Car parking requirements** (refer to **CE-33-20**).

No amendments are necessary to the car parking requirements specified in **Table 33.10**, which are in compliance with the provisions of the Guidelines.

#### ■ SPPR 4 - Cycle Parking and Storage

Some additional specifications are proposed to be inserted in the text of **Section 33.9.6 Cycle parking and facilities** (refer to **CE-33-0X**).

No amendments are necessary to the bicycle parking requirements specified in **Table 33.9**, which are in compliance with the provisions of the Guidelines.

### Additional recommendations

Several other amendments are proposed in addition to those arising from the four SPPRs. Such amendments provide greater clarity to potential applicants.

These recommended amendments also include references to the relevant sections of the SRDCS Guidelines, which contain details such as a methodology for calculating/measuring residential density, design checklist for quality developments, supplementary information for planning applications etc.

In relation to residential densities, the Guidelines provide a step-by-step approach to refining density and car parking requirements based on "Accessibility". Under this criterion, the Planning Authority should distinguish between:

- highly accessible locations (within 1000 m of high-capacity transport nodes),
- accessible locations (within 500 m of high-frequency bus services),
- intermediate locations (1000 m of high-frequency bus services or within 500 m of "reasonably frequent" bus services, i.e. one bus every 15 minutes at peak hour)
- peripheral locations (none of the above).

The same criterion must be used to determine residential car parking requirements (as per SPPR 3), from zero car parking spaces in highly-accessible locations to two car parking spaces in peripheral locations.

Given the type and frequency of bus services in Sligo Town, it is considered that all locations are either "intermediate" or "peripheral" in terms of accessibility. Any refinements based on the Accessibility criterion may be considered as part of the preparation of a Local Area Plan for Sligo.

Consequently, it is considered that the requirements of SPPR 3 – i.e. provision of two car parking spaces per dwelling in "intermediate" and "peripheral" locations are satisfied by the existing provisions of the Draft Plan.

It is not considered necessary to map the different type of locations in Sligo Town on the basis of accessibility (as defined in the Guidelines), until (and unless) the forthcoming Local Area Plan for Sligo Town and Environs requires further refinements to car parking standards.

## Recommended amendments

**CE-03-07** In **Chapter 3 Core Strategy Statement**, modify the text of **Section 3.2.6 Residential density** as follows:

### 3.2.6 Residential density

A key objective of the NPF and RSES is to promote the compact growth of towns and villages by increasing the density of development in existing built-up areas and new urban extensions.

The NPF also acknowledges that there is a need for more proportionate and tailored approaches to residential development. *The Circular Letter NRUP 02/2021 clarifies that "it is necessary to adapt the scale, design and layout of housing in towns and villages, to ensure that suburban or high density urban approaches are not applied uniformly and that development responds appropriately to the character, scale and setting of the town or village".*

*The Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (January 2024) set out a methodology "to assist planning authorities in appropriately integrating national planning policy in relation to settlement growth and residential density into statutory development plans". The Guidelines offer flexibility, allowing planning authorities to take into account the circumstances of a plan area as part of the decision making process.*

Having regard to the NPF *the Sustainable Residential Development Guidelines (2009) and subsequent Circular Letter (NRUP 02/2021) and the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (January 2024)*, the Planning Authority has determined the appropriate **average residential density in each town and village subject to land-use zoning** residential density ranges in the County's towns and villages, as set out below. At the same time, exclusively for the purpose of calculating housing allocations, a specific average residential density has been applied to each town and village subject to land-use zoning. Details are provided in the individual town and village plans (Chapters 11 to 22 of this Plan).

#### **Sligo Town**

For Regional Growth Centres, such as Sligo Town, recommended densities range from 50-150 dwellings per hectare (net) in the town centre, to 35-50 units/ha at the edges or in new suburban extensions.

As part of the preparation of the Local Area Plan for Sligo Town, the density ranges will be refined. In the interim period, it is considered appropriate to apply the higher-density range (50-150 units/ha) in areas zoned TC1 and TC2, and the lower-density range in all other areas, unless site-specific reductions are necessary.

#### **Support Towns and large Satellite Villages**

In small to medium-sized towns (population from 1,500 to 5,000) applicable densities range from 25 to 40 units/ha at the edges, while in the central areas new development "should respond positively to the scale, form and character of existing development, and to the capacity of services and infrastructure".

This density range is applicable to Ballymote, Enniscrone, Tobercurry, Ballysadare, Collooney and Strandhill. While Enniscrone's population was under 1,500 at Census 2022, its designation under the Core Strategy promotes residential growth, thus justifying the application of higher densities.

### Smaller towns and villages

In relation to rural towns and villages (population under 1,500), the Guidelines specify that “these settlements are not identified for significant population growth under the NPF and should grow at a limited pace that is appropriate to the service and employment function of the settlement, and the availability and capacity of infrastructure to support further development”.

No residential density range is recommended in such settlements. Instead, the Guidelines indicate that “the density of development at such locations should respond in a positive way to the established context”.

#### **CE-10-05** In **Chapter 10 Urban development principles**, modify the last paragraph of **Section 10.4.3 Masterplanning urban extensions** as follows:

Further guidance on the role, scope and content of masterplans may be obtained from the *Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities* (January 2024) *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (Cities, Towns and Villages)* and the accompanying *Urban Design Manual – A Best Practice Guide* (DECLG, 2009), as well as from the UK documents *Creating Successful Masterplans* and *Getting the big picture right: A guide to large scale urban design* (Commission for Architecture and the Built Environment, 2004 and 2010, respectively).

#### **CE-26-01** In **Chapter 26 Residential development**, modify the text of **Section 26.1.2 Residential density** as follows:

### 26.1.2 Residential density

A key objective of the NPF and RSES is to promote the compact growth of towns and villages. One way of achieving this is by increasing the density of development in existing built-up areas and new urban extensions.

Residential densities for different types of areas in towns and villages are specified in the statutory (Section 28) *guidelines for planning authorities on Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities* (January 2024).

**Section 3.2.6 in Volume 1 of this Plan indicates** the applicable density ranges in the County's towns and villages as follows:

**Sligo Town** - apply the higher-density range (50-150 units/ha) in areas zoned TC1 and TCs, and the lower-density range in all other areas, unless site-specific reductions are necessary.

**Ballymote, Enniscrone, Tobercurry, Ballysadare, Collooney and Strandhill** - applicable densities range from 25 to 40 units/ha at the edges, while in the central areas new development “should respond positively to the scale, form and character of existing development, and to the capacity of services and infrastructure”.

**All other zoned settlements** - No residential density range is recommended. The density of development at such locations should respond in a positive way to the established context.

*Sustainable Residential Development in Urban Areas*, issued in 2009. These densities range from 35-50 dwellings per hectare (net) in larger towns such as Sligo, to 15-20 units/ha at the edge of small towns or villages.

However, the NPF also acknowledges that there is a need for more proportionate and tailored approaches to residential development. The *Circular Letter NRUP 02/2021* clarifies that “it is necessary to adapt the scale, design and layout of housing in towns and villages, to

ensure that suburban or high density urban approaches are not applied uniformly and that development responds appropriately to the character, scale and setting of the town or village”.

Planning authorities are advised to apply a “graduated and responsive, tailored approach to the assessment of residential densities”.

The density ranges set out in Section 3.3 of the SRDCS Guidelines should be refined, based on consideration of centrality, and accessibility to services and public transport, settlement character, amenity and the natural environment. Section 3.3.6 of the Guidelines lists exceptional situations where very high densities (over 300 units/ha) would be open to consideration, or where lower densities would be acceptable (on very small infill sites, to protect the amenities of surrounding properties).

Having regard to the *Sustainable Residential Development and Compact Settlements Guidelines (2024) NPF*, *Sustainable Residential Development Guidelines (2009)* and subsequent *Circular Letter (2021)*, the Planning Authority will determine the appropriate residential density for each development proposal by considering the following:

- a. the settlement category, based on the criteria set in Section 3.3 of the Guidelines;
  - b. the type of area, based on the descriptions detailed in Section 3.3 of the Guidelines (e.g. centre, urban neighbourhood, suburban/edge/urban extension);
  - c. the recommended density range for the area;
  - d. the appropriate density, refined in accordance with the criteria set out in Section 3.4 of the Guidelines:
    - proximity and accessibility to services and public transport (high-capacity public transport node or interchange; accessible location; intermediate location; peripheral location);
    - local character, historic environment (built and landscape heritage), existing residential amenity and the natural environment;
- a. the size and character of the town or village, and its general pattern of development;
  - b. the site’s location in relation to the town/village centre and the range of residential densities in the surrounding area;
  - b. the capacity of the infrastructure to serve the demands of the proposed development;
  - c. streetscape, topography, landscape and other features of the site;
  - d. design quality and the resulting levels of amenity.

**CE-26-02** In Chapter 26 Residential development, Section 26.1.3 Design and layout of housing developments, modify the text under the heading **Statutory guidance** as follows:

The *Sustainable Residential Development and Compact Settlements Guidelines (2024) 2009 statutory guidelines on Sustainable Residential Development in Urban Areas (Cities, Towns and Villages)* and the *accompanying Urban Design Manual (2009)* provide the basis on which planners, designers and developers can translate the concept of sustainable living into reality.

The height of new buildings and the design of new apartments were the subject of two further sets of ministerial guidelines issued under Section 28 of the Planning and Development Act, in December 2018 and **December 2020 July 2023** respectively.

The *Circular Letter NRUP 02/2021* brought further details and clarifications on the application of previously issued guidance. All these guidelines form the basis on which the Planning Authority assesses applications for housing developments in towns and villages (refer also to **Section 33.3** and **33.4** in the **Development Management Standards**).

**CE-26-03** Section 26.1.6 Design Statement for multi-unit residential developments, insert two additional items as follows:

## 26.1.6 Design Statement for multi-unit residential developments

Designers and developers of multi-unit residential developments will be required to submit a Design Statement as part of the planning application (refer to **P-UHD-1**). The Design Statement must demonstrate how the architects, urban designers and engineers have complied with statutory guidelines and with the design guidance for urban development set out in **Chapter 33 (Development Management Standards) of this Plan**. The Statement shall address the following:

1. Justification of proposed residential density (refer to **P-UHOU-2**)
2. House types, design and mix, where applicable (refer to **P-UHOU-4**)
3. Relationship between the scheme layout and the surrounding built environment
4. Circulation, parking and connectivity to surrounding areas, both existing and future
5. Design of streets, footpaths, cycle paths and public areas
6. Communal/public open space design and landscaping
7. Universal design and age-friendly provisions (refer to Age-friendly housing policies)
8. Mix and distribution of uses (refer to SRDCS Guidelines, Section 4.4(ii))
9. Green and blue infrastructure (refer to SRDCS Guidelines, Section 4.4(iii))

**CE-26-04** In **Urban Housing policies, p.44**, amend P-UHOU-2 as follows:

**P-UHOU-2** Ensure that appropriate densities are achieved in appropriate locations and circumstances, in accordance with the principles set out in the *Sustainable Residential Development and Compact Settlements Guidelines (2024) Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas* and the *Urban Design Manual: A Best Practice Guide* (DEHLG, 2009), *Urban Development and Building Height Guidelines for Planning Authorities* (2018), *Circular Letter NRUP 02/2021* and any subsequent statutory guidance.

**CE-33-01** In **Chapter 33 Development management standards**, modify the text immediately under the heading **33.2 General standards** as follows:

## 33.2 General standards

When proposing any type of development, in an urban or rural location, applicants are advised to have regard to the considerations listed below.

Development proposals in urban locations (towns and villages) should have regard to the provisions of the *Sustainable Residential Development and Compact Settlements Guidelines*

(2024), *Appendix C: Supplemental information for Planning Applications*, and *Appendix D: Design Checklist – Key Indicators of Quality Design and Placemaking*.

**CE-33-02** In **Chapter 33 Development management standards, Section 33.2.2 Impact of development on its surroundings**, modify the first bullet point as follows:

The following factors will be considered in assessing the impact of a proposed development in both urban and rural areas:

- a. degree of overshadowing and loss of light to surrounding properties and amenity spaces (e.g. areas of open space, gardens and patios). A daylight, sunlight and overshadowing assessment may be required. **The assessment shall be informed by the most recent edition of 'Site Layout Planning for Daylight and Sunlight: A guide to good practice' (BRE).**

If a technical assessment of daylight performance is considered necessary, regard should be had to the provisions outlined in guides like *A New European Standard for Daylighting in Buildings* (IS EN17037:2018), UK National Annex BS EN17037:2019 and the associated BRE Guide 209 2022 Edition (June 2022), or any relevant future standards specific to the Irish context.

**CE-33-05** In **Chapter 33 Development management standards**, in the list under the heading **33.3 Residential development in urban areas**, replace the third bullet point as follows:

- ***Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities* (DoEHLG, 2009) and *Circular Letter NRUP 02/2021* (DHLGH, 2021)**
- ***Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities* (DHLGH, 2024)**

**CE-33-06** In **Chapter 33 Development management standards, Section 33.3.1 Multi-unit housing schemes**, modify the **Design Statement** contents list under the third paragraph as follows:

The **Design Statement** must demonstrate how the architects, urban designers and engineers have complied with statutory guidelines and with the design guidance in this Plan. The Statement shall address the following:

10. Justification of proposed residential density
11. House types, design and mix of units, where applicable
12. Relationship between the scheme layout and the surrounding built environment
13. Circulation, parking and connectivity to surrounding areas, both existing and future
14. Design of streets, footpaths, cycle paths and public areas
15. Communal/public open space design and landscaping
16. Universal design and age-friendly provisions
17. **Mix and distribution of uses (refer to SRDCS Guidelines, Section 4.4(ii))**
18. **Green and blue infrastructure (refer to SRDCS Guidelines, Section 4.4(iii))**

**CE-33-07** – In Chapter 33 Development management standards, Section 33.3.1 Multi-unit housing schemes, modify the Table 33.1 as follows:

**Table 33.1 Required contents of the Design Statement for multi-unit housing developments**

Design Consideration	Demonstrate, with text, annotated diagrams and illustrations, how the proposed scheme complies with the requirements set out in this Plan and relevant national guidance documents
Justification of proposed residential density	<ul style="list-style-type: none"> <li>• Section 26.1.2 of this Plan</li> <li>• <i>Sustainable Residential Development Guidelines (2009) and subsequent Circular Letter (2021)</i></li> <li>• <i>Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (DHLGH, 2024) (SRDCS Guidelines)</i></li> </ul>
House types, design and mix of units	<ul style="list-style-type: none"> <li>• Sections 26.1.1, 26.1.3 26.1.4, 33.3.5 of this Plan</li> <li>• Criteria 03, 04, 10 and 12 of the <i>Urban Design Manual</i></li> <li>• <i>Chapter 5 of the SRDCS Guidelines 2024</i></li> </ul>
Relationship between the scheme layout and the surrounding built environment	<ul style="list-style-type: none"> <li>• Criteria 01, 02 and 05 of <i>The Urban Design Manual</i></li> <li>• <i>Section 4.4(v) of the SRDCS Guidelines 2024</i></li> </ul>
Circulation, parking and connectivity to surrounding areas, both existing and future	<ul style="list-style-type: none"> <li>• Section 10.4.4 of this Plan and Sections 33.3.2, 33.3.11 below</li> <li>• Criteria 07 and 11 of the <i>Urban Design Manual</i></li> <li>• <i>Section 4.4(i) of the SRDCS Guidelines 2024</i></li> </ul>
Design of streets, footpaths, cycle paths and public areas	<ul style="list-style-type: none"> <li>• Section 33.3.3 of this Plan</li> <li>• Criteria 06, 07, 08 and 12 of the <i>Urban Design Manual</i></li> <li>• <i>Design Manual for Urban Roads and Streets</i></li> <li>• <i>Section 4.4(i) of the SRDCS Guidelines 2024</i></li> </ul>
Communal or public open space design and landscaping	<ul style="list-style-type: none"> <li>• Section 33.3.6 of this Plan</li> <li>• Criteria 08, 11 and 12 of the <i>Urban Design Manual</i></li> <li>• <i>Section 4.4(iv) of the SRDCS Guidelines 2024</i></li> </ul>
Universal Design and age-friendly housing	<ul style="list-style-type: none"> <li>• Sections 26.1.4, 26.1.5 and 32.2.3 of this Plan</li> <li>• <i>Building for Everyone - a Universal Design Approach</i></li> <li>• <i>Age-Friendly Principles and Guidelines for the Planning Authority</i></li> <li>• Criteria 03 and 09 of the <i>Urban Design Manual</i></li> </ul>
Mix and distribution of uses	<ul style="list-style-type: none"> <li>• <i>Section 4.4(ii) of the SRDCS Guidelines 2024</i></li> </ul>
Green and blue infrastructure	<ul style="list-style-type: none"> <li>• <i>Section 4.4(iii) of the SRDCS Guidelines 2024</i></li> </ul>

**CE-33-08** In Chapter 33 Development management standards, Section 33.3.5 Distance between dwellings, modify the text as follows:

### 33.3.5 Distance between dwellings

Houses and apartment buildings should be designed in a manner that minimises overlooking and overshadowing of adjoining properties, and avoids the loss of daylight. At the rear of dwellings, there should be adequate separation between opposing first floor windows.

In general, there should be a separation of about 22 m between the rear of 2-storey dwellings. This may be relaxed to 16 m if it can be demonstrated that the development is designed in such a way as to preserve the amenities and privacy of adjacent properties.

In general, there should be a separation of at least 16 metres between opposing windows serving habitable rooms at the rear or side of houses, duplex units and apartment units, above ground floor level. Separation distances below 16 metres may be considered acceptable in circumstances where there are no opposing windows serving habitable rooms and where suitable privacy measures have been designed into the scheme to prevent undue overlooking of habitable rooms and private amenity spaces.

Careful positioning and design of opposing windows can prevent overlooking, thus enabling shorter back-to-back distances. Windows serving halls and other non-habitable spaces do not require the same degree of privacy as habitable rooms. A detailed statement in this regard, including illustrations, annotated diagrams and commentary will be required in order for the standard 22-m distance to be relaxed.

All proposals for residential development over three-storeys high shall provide acceptable separation distances between blocks, to avoid negative effects such as excessive overlooking, overbearing and overshadowing effects.

A minimum of 2.3 metres shall be provided between the side walls of detached, semi-detached and end-of-terrace dwellings, to ensure privacy and ease of access. A property boundary should occur mid-way along this separation.

**CE-33-09** In Chapter 33 Development management standards, Section 33.3.7 Public open space in multi-unit housing schemes, modify the text as follows:

### 33.3.7 Public open space in multi-unit housing schemes

Open space is required to be provided with all new housing developments. Public open space should form an integral part of the design and layout of a development and provide a connected hierarchy of spaces, with suitable landscape features, including seating and provision for children's play.

Suitably designed and landscaped areas of formal and informal recreational open space (incorporating children's play areas and associated equipment) should be an integral part of the design of new housing schemes. It is important that new open space is usable, safe and integrated within the scheme as part of a cohesive landscape structure.

The Council will encourage applicants to pool land in order to allow the provision of large multi-purpose amenity areas (e.g. parkland and playing pitches), as well as small incidental open spaces within housing areas.

## Quantitative standards

A minimum of 10% and a maximum of 15% of the net site area shall be reserved for the provision of communal open space, landscaped to a high standard.

- The minimum requirement should be justified taking into account existing public open space provision in the area and broader nature conservation and environmental considerations.
- In the case of Settlement Consolidation Sites and other large sites, the minimum public open space requirement will be determined on a masterplan-led basis, having regard to the overall approach to public park provision within the area.
- In the case of sites that contain significant heritage, landscape or recreational features and sites that have specific nature conservation requirements, a higher proportion of public open space may need to be retained. The 10-15% range shall not therefore apply to new development in such areas.
- In accordance with the Policy and Objective 5.1 of the SRDCS Guidelines, in some circumstances the Planning Authority might decide to set aside (in part or whole) the public open space requirement arising under the development plan. This can occur in cases where the Planning Authority considers it unfeasible, due to site constraints or other factors, to locate all of the open space on site.
- In other cases, where the Planning Authority considers that the needs of the population would be better served by the provision of a new park in the area, or by the upgrade of an existing public open space or amenity, the applicant may be asked to make a financial contribution within the terms of Section 48 of the Planning and Development Act 2000 (as amended) in lieu of provision within the application site.

A minimum of 15% of the development site area shall be reserved for the provision of communal open space, landscaped to a high standard.

On institutional lands, often containing large tracts of open space, any proposals for higher-density residential development must take into account the objective of retaining the "open character" of these lands, while at the same time ensuring that an efficient use is made of the land. In these cases, a minimum open space requirement of 20% of site area applies.

**CE-33-10** In **Chapter 33 Development management standards, Section 33.3.8 Private open space**, modify the Table 33.3 and the text as follows:

### 33.3.8 Private open space

#### Houses

Private open space must form part of the curtilage of the house and be designed to provide a high standard of external amenity space in one or more usable areas. Open spaces may take the form of traditional gardens or patio areas at ground level, and / or well designed and integrated terraces and/or balconies at upper level.

The open space must be directly accessible from the unit it serves and a principal area of open space should be directly accessible from a living space.

Rear gardens should generally be provided with a permanent and durable wall or fence with a height of 2 m, to ensure privacy.

Private open space shall usually be provided behind the front building line of the house, and to the requirements set out below. Narrow strips of open space to the side of houses shall not be included in the private open space calculations.

**Table 33.3 Minimum net garden sizes for houses**

House type	Minimum size
1 bedroom	20 m <sup>2</sup>
2 bedroms	30 m <sup>2</sup>
3 bedrooms or fewer	60 m <sup>2</sup> 40 m <sup>2</sup>
4 or more bedrooms	75 m <sup>2</sup> 50 m <sup>2</sup>

Reductions in rear garden area or depth may be considered in the following exceptional circumstances, subject to a reasonable degree of amenity:

- High-density, infill developments, special-needs housing or retirement homes;
- houses on corner sites that perform an urban design role;
- to protect the established pattern of plot sizes of historic streets.
- where an equivalent amount of high quality semi-private open space (see Table 5.1 and Section 5.3.2 of the SRDCS Guidelines) is provided in lieu of the private open space, subject to at least 50% of the area being provided as private open space. The semi-private open space should be well integrated and accessible, and provide a high standard of amenity for all users.
- for building refurbishment schemes on sites of any size or urban infill schemes on smaller sites (e.g. sites of up to 0.25ha) the private open space standard may be relaxed in part or whole, on a case-by-case basis, subject to overall design quality and proximity to public open space.

Rear gardens should generally be provided with a permanent and durable wall or fence with a height of 2 m, to ensure privacy.

**CE-33-11** In Chapter 33 Development management standards, Section 33.3.8 Private open space, modify the Table 33.4 as follows:

**Table 33.4 Minimum net private open space for apartments**

Apartment type	Size
Studio	4 m <sup>2</sup>
One-bedroom apartment	5 m <sup>2</sup>
Two-bedroom apartment (3 persons)	6 m <sup>2</sup>
Two-bedroom apartment (4 persons)	6 7 m <sup>2</sup>
Three-bedroom apartment	9 m <sup>2</sup>

**CE-33-12** In **Chapter 33 Development management standards**, modify the title and the text of **Section 33.3.9 Management companies** as follows:

### 33.3.9 Operation and management companies of housing developments

Estate management is necessary for maintaining the amenity, physical and visual quality of housing developments once they are completed.

Section 34(4)(i) of the Planning Act indicates that conditions can be attached to a planning permission regarding the maintenance or management of a housing development.

Planning applications should include an operational management plan that sets out details of the long-term management and maintenance of the scheme. The plan should address provisions made for the storage and collection of waste materials in residential schemes, particularly where there are reduced areas of private outdoor space. Communal refuse facilities shall be accessible to each housing unit and designed with regard to the projected level of waste generation and types and quantities of receptacles required.

**CE-33-13** In **Chapter 33 Development management standards**, **Section 33.3.11 Parking standards for housing developments**, modify the text as follows:

(...) In some older residential areas, small front gardens and original features such as railings are part of the character of the area. In such cases, car parking in front gardens may not be permitted.

Where off-street or in-curtilage parking is provided, it should be designed to integrate into the block layout and building envelope in order to maximise efficiency, enable future adaptability to other use (e.g. repurposing of space) and to reduce the visual impact of parked cars.

Appropriately designed on-street car parking will be acceptable where it facilitates higher residential densities in particular locations, and where traffic and pedestrian safety are not endangered. On-street parking should be designed and landscaped so as to reduce the visual impact of parked cars in public areas.

Bicycle parking and secure storage facilities shall be provided in all new housing developments, for both residents and visitors. (...)

**CE-33-19** In **Chapter 33 Development management standards**, **Section 33.9.6 Cycle parking facilities**, modify the title and text as follows:

### 33.9.6 Cycle parking and storage facilities

Safe and secure cycle parking and storage facilities shall be provided in conjunction with any new development proposals and the standard requirements are set out in **Table 33.9**.

In the case of residential units that do not have ground level open space or have smaller terraces, a general minimum standard of one (1) cycle storage space per bedroom should be applied.

Cycle storage facilities should be provided in a dedicated facility of permanent construction, within the building footprint or, where not feasible, within an adjacent or adjoining purpose-built structure of permanent construction, with individual lockers.

In all parking and storage facilities, provision should be made for a variety of bicycle types, including larger/heavier cargo and electric bikes.

Cycle parking areas shall be easily accessible and designed so that cyclists feel safe. It is best practice that either secure cycle cage/compound or preferably locker facilities are provided. A distinction should be made between long-term parking for staff or residents and short-term parking for customers or visitors. "Sheffield" stands are satisfactory for short-term cycle parking, whereas long-term parking requires secure, covered lockers and sheltered bicycle parking.

Shower and changing facilities, and storage areas for clothing (e.g. waterproofs and helmets) should be provided for long-distance commuters.

**CE-33-20** In **Chapter 33 Development management standards, Section 33.9.7 Car parking requirements**, modify the text as follows:

### 33.9.7 Car parking requirements

Car parking standards are set out in **Table 33.10** below to guide the design and layout of new developments. These parking standards show a range from minimum to maximum parking provision within a new development.

Applicants will be required to provide a rationale for the number of car parking spaces proposed, and to demonstrate that the parking levels are necessary and appropriate, particularly when they are close to the maximum provision.

The maximum car parking standards do not include bays assigned for use by a car club, designated short-stay, on-street Electric Vehicle (EV) charging stations or accessible parking spaces.

Visitor parking provision is included in the maximum car parking standards.

In circumstances where a deviation from the standards is proposed, the applicant shall submit details of the predicted parking requirements associated with the proposed development and the capacity of the proposed on-site provision to accommodate this demand.

## 9.4 Recommendations on miscellaneous issues

**CE-02-01** In **Volume 1, Chapter 2, Section 2.5 Climate Action at Local Authority level**, under the sub-heading **Local Authority Climate Action Plan** (p. 11), amend the fourth paragraph as follows:

Sligo County Council's first Climate Action Plan was adopted in February 2024. was under preparation in 2023, at the time of finalising the Draft CDP 2024-2030.

A Climate Change Risk Assessment carried out in May 2023 (by consultants KPMG Future Analytics) identified flooding as the main potential threat to communities in County Sligo. The frequency of river and pluvial flooding is stated to be on the rise, while coastal erosion and coastal flooding have already damaged habitats and disrupted transport networks.

Sligo County Council will need to proactively plan for and adapt to the current and future climate change risks identified. Given that the Local Authority's development plan must take account of the LA Climate Action Plan, it may be necessary to amend/vary this CDP post-adoption in order to ensure consistency between the two statutory documents in terms of spatial planning.

The strategic objectives of the Sligo CAP include the following:

1. achieve the carbon emission reduction target of 51% for 2030, progressing to the 2050 target for carbon neutrality;
2. enable the 'just transition' so that no household, community or business is disadvantaged by decarbonisation measures;
3. cultivate decarbonisation co-benefits across key sectors in the county/city;
4. provide supports to communities and organisations and foster collaboration to achieve the above.

This CDP has taken account of the Sligo Climate Action Plan and is consistent with the CAP in terms of spatial planning.

**CE-11Z-07** In **Chapter 11 Sligo Town Plan**, on the **Zoning Map**, amend the zoning of 1.54 ha of lands in the Cranmore estate from OS to eRES, as shown on the CE-Recommended Zoning Amendments Map for Sligo Town.

**CE-11Z-08** In **Chapter 11 Sligo Town Plan**, on the **Zoning Map**, change the zoning of 0.09 ha lands in Rosehill from CF to OS.

**CE-26-06** In **Chapter 26 Residential development, Urban Housing policies**, amend P-AFH-5 as follows:

**P-AFH-5** In the case of apartment developments, ensure that 50 25 % of units in any development comprising apartments exceed the specifications of *Universal Design Guidelines for homes in Ireland* (National Disability Centre for excellence in Universal Design) and are suitable for older people / mobility impaired people.

**CE-41-01** In **Chapter 41 Carney village plan, Section 41.2.1** insert the following additional objective:

- D. Provide a looped walk around Carney village (and on to Ballygilgan beach) by extending the existing forest walk from the Cashelgarran Road eastwards to the L-3303-0 at Ballygilgan and by providing a new footpath along the L-3303-0 back to the village centre.