

**Second Chief Executive's Report**  
on submissions and observations  
relating to the Draft CDP 2017-2023

**VOLUME 1**

**Responses to submissions  
on Volume 1 of the Draft CDP**



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# Introduction

The Draft County Development Plan 2017-2023 and associated documentation were placed on public display for a period of 10 weeks, from 21 September to 30 November 2016.

The documentation included:

- Draft Volume 1 – Main written statement of policy
- Draft Volume 2 – Mini-Plans for 32 villages
- Housing Strategy
- County Sligo Retail Strategy
- Proposed additions and deletions from the Record of Protected Structures
- Strategic Flood Risk Assessment
- Environmental Report and Non-Technical Summary (SEA)
- Appropriate Assessment Screening Report

The Planning Section held three public information sessions, in Tobercurry (20 October 2016), Sligo (27 October 2016) and Ballymote (3 November 2016). Every Tuesday during the consultation period, planners were available to meet members of the public who had queries in relation to the Draft Plan.

By 30 November 2016, **a total of 176 submissions** and observations were received from the general public and from prescribed state bodies (Identical submissions received from different individuals are considered to be a single submission with multiple signatories).

Of these, 56 submissions covered a variety of general issues that affect the whole of County Sligo and 71 submissions were in relation to the mini-plans.

A further **49 submissions** were received in relation to the Record of Protected Structures.

**Two submissions** were received early, before 21 September 2016, and **four submissions** were received late, after 30 November 2016.

The early and late submissions are addressed in this Report. Although the Members are not obliged to consider submissions received outside the public consultation period, they may choose to do so.

The **Second Chief Executive's Report (this Report)** summarises the issues raised in submissions and gives the Chief Executive's response to each one, including recommendations as to whether or not the Draft Plan, Environmental Report or RPS should be modified.

## How the Chief Executive's Report is organised

On receipt, each submission was allocated an official reference number. The reference numbers relating to each individual submission are shown in the list included as an Appendix to both Volume 1 and Volume 2 of this Report (submissions on the Draft Plan, including Mini-Plans) and as an Appendix to Volume 3 (submissions on the RPS).

- Submissions relating to **general issues are addressed in Volume 1** of this Report.
- Submissions relating to specific **mini-plan issues are addressed in Volume 2** of the Report. This volume is accompanied by a Map Book containing maps showing the locations of sites referred to in submissions.
- Submissions relating to the **Record of Protected Structures are addressed in Volume 3** of the Chief Executive's Report.

Submissions in Volume 1 are addressed in numerical order. However, they are divided into two sections as detailed below. There is also a third section in this volume (see below).

- **Section I** groups submissions received from the Department of Housing, Planning Community and Local Government (DHPCLG), from the Northern and Western Regional Assembly and from other state and prescribed bodies.
- **Section II** contains submissions received from individuals, community organisations and private companies. Submissions which are very similar have been addressed collectively. This section includes the Chief Executive's response to early and late submissions.
- **Section III** contains the Chief Executive's supplementary recommendations on a range of policy issues pertaining to Volume 1 (main statement) of the Draft CDP. This section also includes recommendations for corrections to Volume 1.

Submissions in Volume 2 are addressed by settlement. The settlements are grouped by municipal district.

- **Section I** groups submissions relating to Mini-Plans located within the Ballymote-Tobercurry Municipal District, i.e. Ballinacarrow, Curry, Easky, Gorteen and Riverstown.
- **Section II** contains submissions relating to Mini-Plans located within the Sligo Municipal District, i.e. Ballincar, Ballintogher, Ballygawley, Ballysadare, Carney, Cliffony, Collooney, Drumcliff, Grange, Mullaghmore, Rathcormac, Rosses Point and Strandhill.
- **Section III** contains the Chief Executive's supplementary recommendations on a range of issues pertaining to Volume 2 (Mini-Plans) of the Draft CDP. This section also includes recommendations for corrections to Volume 2.

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.

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 strikethrough~~

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

## 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.

On foot of the submissions received, and on review of the content of the Draft CDP and RPS, the Chief Executive has recommended a number of *material* (i.e. significant) alterations to the draft. If the members decide that these or other material alterations should be made to the Draft Plan, the proposed amendments must go on public display for a period of minimum four weeks.

All submissions received during the final public consultation phase will be summarised in a Third Chief Executive's Report. Having considered the proposed amendments and the Chief Executive's recommendations on the issues raised, the Members will then finally adopt the Development Plan.

The new Sligo CDP 2017-2023 will become operational four weeks after its adoption.

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

- The Draft CDP – Volumes I and II;
- The Record of Protected Structures and *Proposed additions and deletions* document;
- The Environmental Report (SEA);
- The Appropriate Assessment Screening Report;
- 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 manager'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))

## What happens next?

If the Members decide, by resolution, to accept the Draft Plan as it is, or to make only minor 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.

Before publishing the proposed amendments, they must be screened for potential environmental effects. The Planning Section will carry out the relevant assessments and prepare Addenda to the SEA Environmental Report and the Appropriate Assessment Screening Report. 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.



## Section I.

# Submissions from the Department of HPCLG and other state or prescribed bodies

### Submission no. 52

29 November 2016

Niall Cussen, Principal Adviser, Forward Planning Section  
Department of Housing, Planning, Community and Local Government

#### Issue no. 1

##### Green belt policy

The Department endorses the use of green belt policies around settlements in County Sligo, in order to manage growth and avoid sprawl. Such policies ensure there is a clear demarcation between built-up areas and the surrounding countryside through appropriate zoning objectives, development limits and plan limits.

##### Opinion

The Department's endorsement is noted.

##### Recommendation

No change to the Draft Plan and Environmental Report.

#### Issue no. 2

##### Sligo and Environs Development Plan

The Department notes in **Section 3.5.1** of the Draft CDP that *“the zoning and objectives contained in the SEDP are incorporated as statutory provisions into this County Development Plan (2017-2023) and shall remain unchanged until the adoption of a local area plan for Sligo and Environs (expected in 2018)”*.

In order to ensure clarity and provide for a continuous zoning framework for the Sligo and Environs area, the Department requests that the Council incorporates the Sligo and Environs Development Plan document, including maps, as an appendix or supplementary volume with the written statement of the draft County Development Plan, appropriately restated for the period 2017-2023.

##### Opinion

The Department's request is noted and agreed.

##### Recommendation

Incorporate the **Sligo and Environs Development Plan (SEDP)** (written statement and maps) as **Appendix H – Sligo and Environs area**, indicating that this appendix will be removed on the date of

adoption of Sligo and Environs Local Area Plan. The dates on the cover of the Plan and on the maps pertaining to the SEDP shall be changed from 2010-2016 to 2017-2023.

### **Issue no. 3**

#### **Bonds**

The Council is advised to reconsider the working put forward in **Section 3.7.3** regarding bonds. As referred in the Department's circular Letter PL 11/2013, "*open-ended bonds, i.e. bonds that are in place until a development is taken in charge ... are not common in today's market*". The Department considers that insistence on open-ended bonds could result in unreasonable restrictions in bringing forward housing development proposals and recommends that the Council accept "exit date" insurance bonds.

#### **Opinion**

The Department's request is noted and agreed.

#### **Recommendation**

Modify **Section 3.7 Implementation, Subsection 3.7.3 Bonds** (p. 34 of the Draft CDP), as follows:

### **3.7.3 Bonds**

The Planning Authority will impose bonds or other forms of securities on private developers, as a condition of a particular planning permission, [in accordance with the requirements set out in the Department's Circular Letter PL 11.2013](#). These bonds are intended to ensure that all roads, footpaths, landscaping, lighting and other services within a development will be completed to an acceptable standard.

The amount of a bond or security will be based upon the estimated cost of the development works. ~~The A~~ bond or security will ~~remain in place~~ continue to be required until all prescribed works are satisfactorily completed or until the development is taken in charge by the local authority.

### **Issue no. 4**

#### **Vacant and unfinished housing**

Noting that overall vacancy rates in Sligo are above average, the Department welcomes the general policies and objectives on vacant housing set out in section 5.2.3 of the Draft CDP, and requests the Council to consider expanding these provisions to reflect the Government's *Rebuilding Ireland* programme, especially in relation to pillar 5<sup>1</sup>. Further policies and objectives should be included "that actively target vacant housing with reducing the social housing waiting list".

#### **Opinion**

##### Vacancy rates

Section 5.2.3 of the Draft CDP indicates that Census 2011 recorded a residential vacancy rate of 22.2% in County Sligo, higher than the national average of 14.5%. This apparently high proportion included old properties and new housing, second homes and holiday homes.

According to preliminary results of Census 2016, County Sligo's vacancy rate was 20.8% in April 2016. However, if holiday homes are discounted, the vacancy rate is only 15.2%, just 5.4 percentage points higher than the national average of 9.8%.

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<sup>1</sup> Pillar 5 of the Government's *Rebuilding Ireland* programme has as its key objective to "ensure that existing housing stock is used to the maximum degree possible - focusing on measures to use vacant stock to renew urban and rural areas".

Since Census 2011, a moratorium on multi-unit residential development has been in place in 26 settlements across County Sligo. The monitoring of residential vacancy by the Council planning staff shows that the moratorium has been successful, leading to increased occupancy rates in all settlements.

#### Vacant houses for persons on the housing list

The proportion of vacant homes that would be suitable for occupation by persons currently on the Council's Housing List is much lower than the Census-recorded vacancy rate.

In recent years, the Council has purchased a large number of vacant houses and allocated them to persons on the Housing List. This process is ongoing and does not require additional policies or objectives to be included in the County Development Plan.

#### **Recommendation**

No change to the Draft Plan and Environmental Report.

#### **Issue no. 5**

##### **Unconventional gas exploration and extraction (UGEE)**

The Department advises that, in view of ongoing research and broader legislative amendments, a Council policy prohibiting UGEE projects or operations in County Sligo may be premature.

#### **Opinion**

At the end of October 2016, a Bill calling for the banning of fracking in Ireland passed its first stage in Dáil Éireann.

The Department's submission was made on 29 November 2016.

On 30 November 2016, the EPA published the report of the EPA-led *Joint Research Programme on the Impacts of Hydraulic Fracturing on the Environment and Human Health*. The Minister for Communications, Climate Action and Environment subsequently referred the report to the Joint Oireachtas Committee on Communications, Climate Action and the Environment for consideration, in order to assist at the Committee Stage debate of the proposed hydraulic fracturing legislation due to be progressed by the Oireachtas in 2017.

In the meantime, the 2013 moratorium on the licensing of hydraulic fracturing, pending the outcome of the EPA led Joint Research Programme, remains in place.

#### **Recommendation**

In view of the above, it is recommended that **Section 11.1.10 Unconventional gas exploration and extraction (UGEE)** be omitted from Chapter **11 Energy and telecommunications** of the Draft Plan.

#### **Issue no. 6**

##### **Minor observations**

The Department has the following minor observations:

- a. The current title of the Department (DHPCLG) should be used throughout the Plan instead of DECLG;

- b. The Council should ensure that the distinction between public rights of way and permissive trails is observed (reference to Circular Letter PL 5/2015)
- c. Section 3.7 should include a reference to the Government's vacant site levy and its implementation in County Sligo.

### **Opinion**

The observations are noted and agreed.

### **Recommendations**

- A. The published version of the adopted CDP 2017-2023 shall use the current title of the Department (DHPCLG) consistently throughout the Plan.
- B. In **Section 6.7.4 Outdoor recreational amenities** (p. 94-95 of the Draft Plan), insert the following subsection:

#### **Permissive Trails**

In contrast to public rights of way, many long-distance walking routes exist on a permissive access basis. The National Waymarked Way network is a particular category of walks which are created under the long-distance walking routes committee established in 1979. While they were labelled as National Waymarked Ways, they are not to be confused with designated public rights of way. As National Waymarked Ways are permissive in nature, consent can be withdrawn at any time by the landowner.

- C. In **Section 3.7 Implementation** (Chapter 3 - Core Strategy), insert the following subsection:

#### **3.7. 4 Vacant site levy**

The Urban Regeneration and Housing Act 2015 introduced the vacant site levy as a site activation measure, to ensure that vacant or underutilised land in urban areas is brought into beneficial use, while also ensuring a more efficient return on State investment in enabling infrastructure and helping to counter unsustainable urban sprawl.

The vacant site levy can be imposed by planning authorities under certain conditions in designated areas, i.e. where sites remain vacant and site owners/ developers fail to bring forward reasonable proposals, without good reason, for the development/reuse of such property in line with the provisions of the relevant local area or development plan.

For the purpose of the application of the vacant site levy, a site means "any area of land exceeding 0.05 hectares identified by a planning authority in its functional area but does not include any structure that is a person's home."

The levy shall be applied annually by a local authority at a rate of 3% of the market valuation of the vacant sites, exceeding 0.05 hectares in area, with reduced and zero rates applying in certain circumstances (0.05 hectares roughly equates to one-eighth of an acre or 500m<sup>2</sup>). The market valuation shall be determined by the local authority by authorising a suitably qualified person to estimate the price which the unencumbered fee simple of the site would fetch if sold on the open market. The levy shall be payable by the registered owner(s) of the site.

Sligo County Council will implement the vacant site levy as provided for in the Urban Regeneration and Housing Act 2015 and in accordance with the requirements set out in the Department's Circular Letter PL 7/2016.

The current subsection **3.7.4 Monitoring and reporting** will be renumbered as subsection **3.7.5 Monitoring and reporting**.

**Submission no. 86**

30 November 2016

David Minton, Director  
Northern & Western Regional Assembly (NWRA)

**Issue no. 1****Policy background at national and regional level**

The submission indicates that the Draft National Planning Framework (which will replace the National Spatial Strategy) may be published during Quarter 2/3 of 2017, with a public consultation process commencing early in the New Year. It is envisaged that the Regional Assembly will formally commence the preparation of the Regional Spatial & Economic Strategy (RSES) in Quarter 2 of 2017. Depending on the content of the NPF and RSES, it may be necessary for the Sligo County Development Plan 2017-2023 to be varied in the interest of consistency with the aforementioned documents.

**Opinion**

Noted and agreed.

**Recommendation**

No change to the Draft Plan and Environmental Report.

**Issue no. 2****Core Strategy – Strategic Land Reserve**

The Assembly supports the proposed release of additional land from the Strategic Land Reserve within Sligo City, having regard to the demand for new housing which cannot be met from the existing lands zoned for residential use.

**Opinion**

Noted and agreed.

**Recommendation**

No change to the Draft Plan and Environmental Report.

**Issue no. 3****Core Strategy – objective supporting urban regeneration**

The Urban Regeneration and Housing Act 2015 includes a provision for a vacant site levy, intended as a site activation measure. Section 10(2)(h) of the Planning Act explicitly requires a mandatory objective to be included in development plans to support urban regeneration. The Draft Plan and the reference to the future local area plan for Sligo and Environs should be modified to take account of these requirements.

**Opinion**

The Urban Regeneration and Housing Act 2015 introduced the vacant site levy as a site activation measure, to ensure that vacant or underutilised land in urban areas is brought into beneficial use, while

also ensuring a more efficient return on State investment in enabling infrastructure and helping to counter unsustainable urban sprawl

Under the provisions of the Urban Regeneration and Housing Act 2015, local authorities were enabled to provide a specific objective in their development plans for the development, redevelopment and reuse of vacant urban sites in specific locations within urban areas where they consider it to be beneficial towards securing the objectives of the relevant core strategy, housing strategy and retail strategy for the areas, thereby helping to project a more modern, positive and vibrant image of the area.

Section 10(2)(h) of the Planning and Development Act 2000 (as amended by the Urban Regeneration and Housing Act 2015) specifies that a development plan shall include objectives for the development and renewal of areas identified having regard to the core strategy, that are in need of regeneration, in order to prevent—

- (i) adverse effects on existing amenities in such areas, in particular as a result of the ruinous or neglected condition of any land,
- (ii) urban blight and decay,
- (iii) anti-social behaviour, or
- (iv) a shortage of habitable houses or of land suitable for residential use or a mixture of residential and other uses;

DECLG's Circular Letter PL 7/2016 indicates that planning authorities should in the first instance provide for the development of vacant sites in designated areas ("residential land" and/ or "regeneration land") as an explicit objective in their development plans or local area plans, supporting their core strategies in their development plans.

The areas designated in a development plan or local area plan for the purposes of the levy can be indicated by the clear delineation of the identified areas on relevant maps.

Within the 32 villages zoned under the Draft CDP 2017-2017, there are no areas that would warrant specific objectives for urban renewal, regeneration or redevelopment.

However, within the plan limits of Sligo and Environs, there are several areas subject to regeneration objectives.

Similar designation may be assigned to areas in the Key Support Towns of Ballymote, Enniscrone or Tobercurry when reviewing or preparing the respective local area plans.

The Draft CDP 2017-2023 should be amended to include relevant provisions regarding the incorporation in local area plans of objectives for areas in need of regeneration.

## **Recommendation**

In **Chapter 3 Core Strategy, Section 3.5 Local area plans**, include the following:

Section 10(2)(h) of the Planning and Development Act 2000 (as amended by the Urban Regeneration and Housing Act 2015) specifies that a development plan shall include objectives for the development and renewal of areas that are in need of regeneration, in order to prevent—

- (i) adverse effects on existing amenities in such areas, in particular as a result of the ruinous or neglected condition of any land,
- (ii) urban blight and decay,
- (iii) anti-social behaviour, or

(iv) a shortage of habitable houses or of land suitable for residential use or a mixture of residential and other uses;

While no such areas have been identified in the 32 mini-plans included in Volume 2 of this Plan, a number of areas have been designated for urban regeneration in the 2010 Sligo and Environs Development Plan. The number and extent of such areas will be revised as part of the preparation of Sligo and Environs Local Area Plan. Further such areas may be identified in the Key Support Towns of Ballymote, Enniscrone or Tobercurry when reviewing or preparing the respective local area plans.

#### **Urban regeneration objective**

It is an objective of Sligo County Council to:

**O-REG-1** Identify areas in need of regeneration in Sligo City and, if appropriate, in the Key Support Towns of Ballymote, Enniscrone and Tobercurry, as part of the process of review or preparation of the respective local area plans.

### **Issue no. 4**

#### **Infrastructure**

Considering the critical importance of the “Atlantic Corridor National Road Network” for the Region, the upgrade and improvement of national primary roads in County Sligo are vital for the future growth of Sligo as a Gateway. The NWRA commends the strategic policy SP-TRA-5 and considers that the national road projects referred to in objective O-NR-1 should be highlighted as being of regional and national importance.

#### **Opinion**

Noted and agreed. The national road projects referred to in the national roads objective O-NR-1 are listed in Table 8.B, in Chapter 8 Transport and mobility.

#### **Recommendation**

In **Chapter 8 Transport and mobility**, Section **8.2.1 National primary and secondary roads**, add the following before the first paragraph:

There are five national primary roads and one national secondary road in County Sligo. Considering the critical importance of the Atlantic Corridor national road network for the Northern and Western Regions, their upgrade is vital not just for Sligo's future growth, but for the entire region.

### **Issue no. 5**

#### **Tourism - greenways**

The Assembly welcomes the identification of potential greenway projects on the SLNCR, and on or along the Western Rail Corridor, noting the potential for establishing a regional and cross-border greenway network that would include disused railways in counties Cavan, Monaghan, Donegal and Fermanagh.

#### **Opinion**

Noted. The potential greenway projects mentioned by the NWRA are identified in **Section 8.3 Cycle and pedestrian movements** of the Draft Plan. Related objectives are **Cycling and walking objectives O-CW-5** and **O-CW-6**. Their potential to contribute to a regional, cross-border greenway network

should be highlighted in the forthcoming *Regional Spatial and Economic Strategy* for the Northern and Western Regions.

### **Recommendation**

No change to the Draft Plan and Environmental Report.

### **Issue no. 6**

#### **Tourism – Wild Atlantic Way**

The NWRA comments that the opportunities for tourism growth presented by the Wild Atlantic Way could benefit the wider region if products such as touring/motor-home facilities and accommodation were to be developed along the WAW in County Sligo. In addition to policy P-CZT-1, there would be merit in the evaluation of further tourism objectives regarding trails, walking, hiking routes and outdoor recreation in general throughout the County.

#### **Opinion**

Noted. **Chapter 6 Community facilities** includes an extensive section **6.7.4 Outdoor recreational amenities**, which is accompanied by a set of 23 policies. Policies **P-OR-14** to **P-OR-23** cover issues such as access to lakes, forests, coastal, riverside, upland and other recreational areas, as well as greenways and long-distance walking routes. Such amenities are to be protected and further developed for use by locals and tourists alike, throughout the County, WAW included.

It is not considered necessary to include separate but similar policies or objectives in the Tourism chapter of the Draft CDP.

#### **Recommendation**

No change to the Draft Plan and Environmental Report.

### **Issue no. 7**

#### **Housing – residential vacancy**

Noting the housing vacancy in County Sligo stands at 22.1%, the NWRA recommends incentivising of conversion of derelict or vacant properties. In addition to policies P-VHOU-1 and P-VHOU-2, the Council should consider measures to encourage prospective applicants or purchasers through a reduction in development contributions.

#### **Opinion**

Noted and agreed. The current **Development Contributions Scheme**, adopted in 2011, will be reviewed and updated to reflect recent changes in legislation and economic circumstances. This review, due to be completed by 2018, does not require an objective in the new County Development Plan 2017-2023.

#### **Recommendation**

No change to the Draft Plan and Environmental Report.

## **Issue no. 8**

### **Housing – holiday homes**

The Plan may benefit from clarifying the meaning of “appropriate balance” between the number of holiday homes and the number of permanent homes in settlements with special functions, as indicated in policy P-HSH-2. Baseline figures should be established for holiday homes and permanent homes in Enniscrone, Easky, Mullaghmore, Strandhill and Rosses point. The Council should consider the introduction of a ratio of holiday homes to permanent homes, and consider further holiday home developments within these settlements only if the specified will not be breached.

### **Opinion**

The Draft Plan includes an objective to establish baseline data on the number of residential units in each settlement in the CDP area. During successive residential surveys of the County’s settlements, there have been substantial difficulties in determining whether houses which appear to be vacant are in fact occasionally used as second homes or holiday homes.

Given the difficulties mentioned above, the introduction of a specified ratio of holiday homes to permanent homes would not necessarily help the Council’s efforts to support the consolidation and growth of local communities in holiday towns and villages.

Having regard to the rather poor quality of holiday home developments in the past, the preferred approach taken in the Enniscrone Local Area Plan 2014-2020 was to require that new housing developments be built at standards appropriate for permanent occupation. This approach was chosen in light of evidence that a growing number of holiday homes were being converted and improved in order to be occupied on a long-term or permanent basis by young families or by retiring/retired couples.

A similar provision regarding construction and amenity standards for holiday homes should be included in the Draft CDP.

### **Recommendation**

In Section 5.6.1 **Holiday homes and second homes**, add the following policy:

- P-HSH-4** Ensure that new holiday home developments are constructed to the standards and specifications applicable to housing intended for permanent occupation. Exceptions may be made for specific types of holiday accommodation designed exclusively for short-term occupation by tourists (e.g. apart-hotels, chalets etc.)

## **Issue no. 9**

### **Wind energy policy**

The NWRA notes that the *Wind Energy Guidelines* (DEHLG, 2006) require local authorities to identify areas which are suitable, unsuitable and open to consideration for wind farm proposals. Such areas should be set out in the development plan, to provide a clear framework for all interested parties, including the public. The Assembly indicates that the wind energy policy contained in the Draft Plan could benefit from a “detailed and evidenced landscape character assessment”, consistent with the Guidelines, in addition to what is contained within the Landscape Characterisation Map.

### **Opinion**

Section 3.4 of the 2006 *Wind Energy Guidelines* recommends that the development plan should identify, on maps, areas where there is significant wind energy potential and where wind energy

development will be acceptable in principle, subject to criteria such as design and landscape planning, natural heritage, environmental and amenity considerations.

An examination of the wind speed maps available on the SEAI website ([maps/seai.ie/wind/](http://maps/seai.ie/wind/)) confirms that the areas with the highest wind energy potential are the most elevated areas in the County, particularly the Dartry Mountain range (including Ben Wiskin, Ben Bulben and Truskmore) in North Sligo, the Ox Mountains in West Sligo and Carran Hill in the south-east of the county. These areas are extremely vulnerable from a visual/landscape perspective and are also part of the Natura 2000 network, due to their high value in terms of natural heritage.

The Landscape Characterisation Map included in the Draft CDP designates the same areas as “sensitive landscapes”, where strict criteria apply to any proposed developments, and where wind farms are not normally permissible.

Outside the designated sensitive landscapes, wind farm development is open to consideration, subject to the relevant planning criteria applicable to such proposals. A more detailed suitability assessment, undertaken in accordance with the step-by-step guide set out in Section 3.5 of the Wind Energy Guidelines, is likely to result in a further reduction in the number of county areas where wind energy developments would be open to consideration.

However, there is no objection to the undertaking of an *analysis of suitable areas for wind energy*, using the step-by-step guide provided in the Wind Energy Guidelines 2006. Refer also to the Chief Executive’s opinion and recommendation regarding Submission no. 79.

## **Recommendation**

In Chapter **11 Energy and telecommunications**, **Section 11.1 Energy**, add the following:

### **Strategic energy objective**

**SO-EN-1** Undertake an analysis of suitable areas for wind energy and prepare a map showing County Sligo’s Landscape Suitability for Wind Energy Developments, in accordance with Section 3.5 of the Wind Energy Guidelines (2006).

## **Issue no. 10**

### **Unconventional oil/gas exploration and extraction (UGEE)**

The Draft Plan proposes not to permit UGEE operations within the county, with the objective of avoiding the risk of serious damage to human health and the environment. The NWRA indicates that such planning policy bans are *ultra vires* and should not be incorporated into the plan”

### **Opinion**

As the NWRA indicates, placing a ban on certain exploration and extraction activities in County Sligo is beyond the legal powers of the County Council, as such activities are currently licensed by the Department of Communications, Climate Action and Environment.

At the end of October 2016, a Bill calling for the banning of fracking in Ireland passed its first stage in Dáil Éireann.

On 30 November 2016, the Minister for Communications, Climate Action and Environment commented on the publication of the report of the EPA-led *Joint Research Programme on the Impacts of Hydraulic Fracturing on the Environment and Human Health*. The Minister noted the issues raised in the Report on the potential impacts of hydraulic fracturing on groundwater and air

quality, together with the identified gaps in legislative oversight surrounding the use of hydraulic fracturing in Ireland. He decided to refer the report to the Joint Oireachtas Committee on Communications, Climate Action and the Environment for consideration, in order to assist at the Committee Stage debate of the proposed hydraulic fracturing legislation due to be progressed by the Oireachtas in 2017.

In the meantime, the 2013 moratorium on the licensing of hydraulic fracturing, pending the outcome of the EPA led Joint Research Programme, remains in place.

### **Recommendation**

In view of the above, it is recommended that **Section 11.1.10 Unconventional gas exploration and extraction (UGEE)** be omitted from Chapter **11 Energy and telecommunications** of the Draft Plan.

### **Issue no. 11**

#### **Compliance with relevant legislation**

The NWRA indicates that it is the responsibility of the Council to comply with relevant legislation in respect of making the Development Plan and to incorporate all necessary transitional arrangements pending the making of a local area plan for Sligo and Environs.

#### **Opinion**

Noted and agreed. The transitional arrangements pending the making of a local area plan for Sligo and Environs are addressed in the Chief Executive's opinion and recommendation on Issue no 2 of Submission no. 52 (Department of HPCLG).

#### **Recommendation**

No further changes to the Draft Plan and Environmental Report.

## Submission no. 13

14 November 2016

Tara Spain, Head of Land Use Planning  
Transport Infrastructure Ireland

### Issue no. 1

Tara Spain indicates that there is a critical need to manage national road assets in accordance with national policy. TII welcomes the reference to the Spatial Planning and National Roads Guidelines for planning authorities (DoECLG, 2012) in the strategic transport policy SP-TRA-5 and the objectives relating to national roads projects in Chapter 8 Transport and mobility.

### Opinion

The support is noted.

### Recommendation

No change to the Draft Plan and Environmental Report.

### Issue no. 1

The submission refers to the EU's Trans-European Transport Network (TEN-T), a planned set of transport networks across Europe. The M-4/N-4 (Dublin to Sligo), the N-17 (Galway to Sligo), the N-15 (Sligo to Donegal) and the N-16 (Sligo to Northern Ireland) are identified as part of the TEN-T Comprehensive Network, "*which has repercussions and action requirements for policies and objectives outlined in the Draft Sligo County Development Plan*".

TII recommends that Section 8.1 of the Draft Plan be amended to include reference to the statutory DoECLG Guidance on Spatial Planning and National Roads.

### Opinion

Noted and agreed. The text and policies of Chapter 8 should be updated to reflect statutory guidance in relation to National roads.

### Recommendation

**A. Modify Section 8.1 National and regional transport policy** (p. 127 of the Draft Plan) by inserting the text shown in **blue** as follows:

The designation of Sligo as a Gateway City in the National Spatial Strategy further emphasises the importance of strong transport links to urban centres in the Border Region, along the Atlantic Corridor, beyond regional and national boundaries. The Border Regional Planning Guidelines specifically support the development of a number of strategic routes, in order to ensure Sligo's success as a Gateway, including all national roads and rail links.

The national roads M-4/N-4 (Dublin to Sligo), the N-17 (Galway to Sligo), the N-15 (Sligo to Donegal) and the N-16 (Sligo to Northern Ireland) are identified as part of the EU's Trans-European Transport Networks TEN-T, which are a planned set of road, rail, air and water transport networks in the European Union.

The policy document **Investing in our Transport Future - Strategic Investment Framework for Land Transport**, published by the Department of Transport, Tourism and Sport (DTTAS) in 2015, emphasises the need for improved alignment of transport and spatial planning. The document states that effective and mutually supportive land use and transport planning policy, in the form of national and regional frameworks, are essential for the development of more sustainable communities.

The guidance document **Spatial Planning and National Roads**, published by the Department of Environment, Community & Local Government (DOECLG) in 2012, sets out planning policy considerations relating to developments affecting National Roads outside the 50 and 60 km/h zones. This document emphasises the importance of maintaining and protecting the strategic function of National Roads.

Government policy strongly promotes the move to more sustainable modes of transport and the policy document **Smarter Travel –A New Transport Policy for Ireland 2009-2020**, published by the Department of Transport (DOT), sets out Government policy objectives with respect to promoting a significant modal shift from private transport to sustainable transport modes over the period to 2020.

In accordance with the above, it is the aim of Sligo County Council to strengthen the County's strategic transport links. The Council will also support the creation of a pedestrian-friendly and cyclist-friendly environment in, and between the County's settlements, with a good provision of public transport, reduced congestion and attractive town and village centres which are not dominated by the car.

Footnote to be inserted:

The TEN-T networks are part of a wider system of [Trans-European Networks \(TENs\)](#), including a [telecommunications network \(eTEN\)](#) and a proposed energy network (TEN-E or Ten-Energy). TEN-T envisages coordinated improvements to primary roads, railways, inland waterways, airports, seaports, inland ports and traffic management systems, providing integrated and intermodal long-distance, high-speed routes.

In general, TEN-T projects are mostly funded by national or state governments. Other funding sources include: European Community funds ([ERDF](#), [Cohesion Funds](#), TEN-T budget), loans from international financial institutions (e.g. the [European Investment Bank](#)), and private funding.

**B. In Section 8.2.1 National primary and secondary roads**, introduce a specific set of policies entitled **National roads policies** as shown below.

Relocate SP-TRA-5 from the section **Transport – strategic policies** to the new **National roads policies** section and rename it **P-NR-1**.

Insert new policies **P-NR-2**, **P-NR-3** and **P-NR-4** as follows:

## National roads policies

It is a policy of Sligo County Council to:

- P-NR-1** Protect the traffic carrying capacity of national roads, the level of service they deliver and the period over which they continue to perform efficiently, by avoiding the creation of new access points or the generation of increased traffic from existing accesses onto the N-4, N-15, N-16, N-17 and N-59 outside the 50 km/h speed limit, in accordance with the DoECLG's publication *Spatial Planning and National Roads -Guidelines for Planning Authorities* (2012).
- P-NR-1** Protect the route corridors necessary for the upgrading of new roads or the upgrading of existing national roads in Sligo, in accordance with the DoECLG's publication *Spatial Planning and National Roads - Guidelines for Planning Authorities* (2012).
- P-NR-3** Apply the provisions of the *Design Manual for Urban Roads and*

*Streets* (DTTS, DECLG 2013) to all development along national roads inside the 60-km/h speed limit zones in towns and villages.

**P-NR-4** Maintain the national road network in accordance with the TII Pavement Asset Management System.

### **Issue no. 2**

Chapters 4 (Economic development), 5 (Housing), 13 (Development management standards) as well as Chapter 1 (Mini-plans general policies) of Volume 2 should contain appropriate cross-reference with the policy to safeguard the safety and operation of the national road network and to restrict access outside the 50 km/h speed limit zones in towns and villages.

### **Opinion**

Specific reference to the policy safeguarding the operation of national roads is not considered necessary in Chapters 4 and 5 of the Draft CDP. Any development along national roads must have regard to **Section 13.8.1 Access onto national roads**. However, it is considered appropriate to include a specific policy section on national roads.

### **Recommendation**

Refer to the Chief Executive's recommendations to Issue No.1 above and Issue no. 6 below.

### **Issue no. 3**

The reference to exemptions to Policy SP-TRA-5 in Section 13.8.1 is considered inappropriate by the TII. Any such exemptions should be discussed and agreed with the TII in accordance with the provisions of Section 2.6 of the DOECLG Spatial Planning and National Roads Guidelines.

### **Opinion**

The observation is noted. The text referred to should be omitted.

### **Recommendation**

In **Section 13.8.1 Access onto national roads**, delete the following paragraph:

~~Exceptions to this approach may apply in the case of a development which is of national or regional strategic importance, which by its nature is most appropriately located outside urban areas, and where the location concerned has specific characteristics that make it particularly suitable for the development proposed.~~

~~Such an exception shall apply only if the proposed access can be shown not to cause a traffic hazard.~~

#### **Issue no. 4**

The submission notes the inclusion of a number of link roads associated with preferred routes for major road schemes planned by the TII, with zoning designations “up to the line of the proposed national roads and links”. These links and junctions “are not considered a practice consistent with protecting routes or the public investment in same”, may not allow for potential future upgrade or improvement works and should be reviewed.

#### **Opinion**

It is considered that there is adequate land reserved for the protection of preferred route corridors, sufficient to allow any potential upgrades or improvements. Access to zoned lands adjacent to preferred national road corridors and links will be subject to Traffic and Transport Assessments, as per section 13.8.1 Access to national roads (p. 246 of the Draft Plan).

#### **Recommendation**

No change to the Draft Plan and Environmental Report.

#### **Issue no. 5**

Tara Spain advises the Planning Authority that the TII has no remit or formal powers to initiate the preparation of the study proposed in Strategic Objective SO-TRA-3. It is considered that the Council would be the most appropriate body to undertake such a study.

#### **Opinion**

Noted and agreed.

#### **Recommendation**

In **Section 8.1 National and regional transport policy**, modify the text of objective **SO-TRA-3** as follows:

- SO-TRA-3** Initiate the preparation of a *Transportation Study for Sligo City & Environs* ~~by Transport Infrastructure Ireland (TII, previously NRA), the National Transportation Authority and the Department of Transport;~~ **subject to available funding**, and implement the recommendations of this Study subject to compliance with the Habitats Directive.

#### **Issue no. 6**

Chapter 1 (Mini-plans general policies) of Volume 2 of the Draft CDP should indicate that access to lands from a national road will not be permitted outside the 50 km/ zone. Lands within the designated green belts, outside a 50 km/h zone, should be accessed via the local road network and should not be accessed directly from a national road.

The mini-plans for Ballinacarrow, Ballysadare, Castlebaldwin, Grange and Dromore West should include an objective indicating that access to areas zoned along the national road network will only be permitted within the 50 km/h urban speed limit zones, in accordance with the provisions of national policy.

## Opinion

It is agreed that there is a need to clarify the position regarding access to national roads within all settlements' built-up areas (e.g. Sligo and Environs area), not only in those settlements for which mini-plans have been prepared.

It is considered that an additional policy should be inserted in the new **National road policies** section, as follows:

## Recommendation

Insert the following policy to **Section 8.2.1 National primary and secondary roads - National roads policies:**

- P-NR-5** Permit direct access to zoned lands along national roads inside the 50 km/h speed limit subject to normal planning considerations. Within **transitional zones** (between 50 km/h and 60 km/h speed limiting signs), access may be permitted, but only in limited circumstances, in the interest of facilitating orderly urban development and subject to a road safety audit carried out in accordance with TII requirements.

## Issue no. 7

The TII note that identifying zoning designations up to the line of the existing national roads, such as the N4 at Collooney, is not considered a practice consistent with protecting routes or the public investment in same and allowing for potential future upgrade/improvement works”.

## Opinion

Additional traffic associated with development proposals in the zoned areas close to the N-4 at Collooney will be subject to TTA as per **Section 13.8.1**.

It is considered that there is an adequate buffer between the existing N-4 and the zoned lands to facilitate future upgrade or improvement works.

## Recommendation

No change to the Draft Plan and Environmental Report.

Michael Kirby  
on behalf of An Taisce North West Local Association

**Issue no. 1**

**Wild Atlantic Way objectives**

An Taisce North West Local Association (ATNWLA) proposes the inclusion of an additional Wild Atlantic Way objective (p. 53 of the Draft CDP), as follows:

*O-WAW-4 Provide a plan for the monitoring and future development of the County's section of the Wild Atlantic Way touring route to ensure the visual/ scenic value of this important amenity is maintained and improved. Ensure that all development is appropriately designed, satisfactorily integrated into the landscape, conserves and enhances natural heritage, protects the environment and does not otherwise negatively impact on the visual/scenic amenity of the countryside, on natural heritage or on the environment. This will be done in co-operation with state agencies, local community groups and other interested bodies to ensure widespread support for preserving and enhancing coastal areas of the County, and improving access to and greater enjoyment of the Wild Atlantic Way.*

**Opinion**

It is agreed to include an additional objective similar to the one proposed. The text of this objective has been discussed and agreed with Failte Ireland.

**Recommendation**

In **Chapter 4.4 Tourism**, include an additional **Wild Atlantic Way objective**, as follows:

*O-WAW-4 Monitor the future development of the County's section of the Wild Atlantic Way touring route to ensure that the scenic and tourism value of this important amenity is maintained. This will be done in co-operation with state agencies, local community groups and other bodies interested in protecting the coastal environment and in improving access and visitor management to the Wild Atlantic Way.*

**Issue no. 2**

**Housing policy in Rural areas under Urban Influence**

ATNWLA suggests the following modifications to policy P-RAUI-HOU-1, p. 73 of the Draft CDP (deletions shown in red, proposed additions shown in green):

**Housing policy in Rural Areas Under Urban Influence**

*It is the policy of Sligo County Council to:*

***P-RAUI-HOU-1** Accommodate proposals for one-off rural houses in **Rural Areas***

*Under Urban Influence, subject to normal planning considerations including Habitats Directive Assessment and compliance with the guidance set out in Section 13.4 Residential development in rural areas (development management standards), where a housing need is demonstrated by the following categories of applicants:*

- A. landowners, including their sons and daughters, who wish to build a first home for their permanent occupation on the landholding associated with their principal family residence where they have lived for a minimum period of seven years;*
- B. persons whose primary employment is in a rural-based activity with a demonstrated genuine need to live in the locality of that employment base, for example, those working in agriculture, aquaculture, forestry, horticulture or other natural resource-based employment and who can demonstrate that they have been engaged in this employment for over five years;*
- C. persons who have no family lands but who wish to build their first home for their permanent occupation in the area, on a site within a 5-km radius of their original family home, within the rural community in which they have spent a substantial and continuous part of their lives (this provision does not apply in cases where the original family home is located in an area zoned for development in a town or a village);*
- D. persons with a link to the rural community in which they wish to build a first home for their permanent occupation, by reason of having lived in this community for a minimum period of seven years or by the existence in this community of long-established ties with immediate family members;*
- E. persons who are required to live in a rural area for exceptional reasons, including health reasons. Such applications must be accompanied by a specialist's report and recommendation outlining the reasons why it is necessary for the applicant to live in a rural area. The application should also be supported by a relevant disability organisation of which the applicant is a member, where applicable.*

*In all instances, applicants will satisfy the Council as to their housing need and provide confirmation that planning for rural housing in the County has not previously been granted to the applicant within ten years of receipt of current application.*

## **Opinion**

The proposed changes in policy appear to eliminate two categories of persons who would currently be qualified to apply for one-off housing in *Rural areas under urban influence*.

ATNWLA seeks further restrictions by suggesting that a 10-year minimum period between two applications for housing lodged by a person.

The proposed policy changes are considered unacceptable, as they would discriminate against returning emigrants, people who need to live close to a family member who requires care in their home, and people who are required to live in a rural area for exceptional reasons.

There is no objective reason to require a 10-year minimum period between a grant of permission for housing and a subsequent application by the same person, whose circumstances might have changed over a possibly shorter period.

With regard to establishing housing need, it is normal practice of the Planning Authority to require applicants for single houses in Rural Areas under Urban Influence to demonstrate their housing need.

Please refer also to the Chief Executive's Supplementary Recommendation regarding changes to the Rural Housing Policies (see last section in this volume).

## **Recommendation**

No change to the Draft Plan and Environmental Report.

### **Issue no. 3**

#### **Ribbon development**

ATNWLA suggests the inclusion of the following paragraph in **Subsection 5.6.3 Ribbon development** (p. 83 of the Draft CD):

*The Planning Authority will have discretion to allow well-spaced and designed infill ribbon development to complete a specific settlement pattern, but only where such development will not lead to further gaps or the merging of separate ribbon development and, or an over proliferation of houses in an area.*

Changes are also proposed with regard to Ribbon development policies:

**P-RD-1** *Discourage development proposals which would be likely to contribute to or exacerbate **undesirable pattern** ribbon development.*

**P-RD-2** *Consider development proposals on gap sites or peripheral sites at locations where ribbon development is already in place, as an alternative to dispersed development that might have a greater visual or traffic safety **provided:***

- *There is no other family land that can be put forward as a site for the applicant under planning considerations.*
- *That the applicant has not sold off sites to third parties (i.e. non-family members) or obtained planning permission for a dwelling previously, and*
- *That the applicant or the landowner has not obtained planning permission(s) previously for the houses which have contributed to the ribbon development adjacent to the proposed site.*

*If these criteria are met the Council may consider granting permission provided all other technical criteria are met and provided the further dwelling will not lead to over development of the area.*

#### **Opinion**

The Planning Authority discourages ribbon development regardless of the personal circumstances of the applicants.

It is considered that the policies P-RD-1 and P-RD-2 (p. 83 of the Draft Plan) address the issue of ribbon development in an adequate manner. These policies indicate that while the Planning Authority discourages ribbon development, proposals on gap or peripheral sites at locations where ribbon development is already in place could be considered, if the alternative had a greater visual or traffic safety impact.

The Planning Authority assesses each application on its own merits, within the limits of relevant policies and based on proper planning and sustainable development criteria.

## Recommendation

No change to the Draft Plan and Environmental Report.

### Issue no. 4

#### Derelict houses policies

ATNWLA suggests the following addition to the Derelict houses policy P-DHOU-1 (p. 83 of the Draft CDP):

**P-DHOU-1** *Encourage the renovation and reuse of existing derelict houses and consider proposals for replacement houses on their merits. **Where historic or vernacular buildings are located on the site or land holding, consideration should seriously be given to their retention, and incorporation into any proposed development.** The structures proposed for replacement should generally be intact and exhibit the main characteristics of a dwelling. The location, siting and design of any such replacement house shall reflect those of the existing derelict dwelling.*

#### Opinion

Noted and agreed.

#### Recommendation

In **Chapter 5 Housing, Subsection 5.6.2 Derelict houses** (p. 82-83 of the Draft CDP), modify policy P-DHOU-1 as follows:

**P-DHOU-1** Encourage the renovation and reuse of existing derelict houses and consider proposals for replacement houses on their merits. The structures proposed for replacement should generally be intact and exhibit the main characteristics of a dwelling. The location, siting and design of any such replacement house shall reflect those of the existing derelict dwelling. **Where historic or vernacular buildings are located on the site, consideration should be given to their retention or incorporation into any proposed development.**

### Issue no. 5

#### Outdoor recreation

ATNWLA suggests the following addition to **Section 9.7 Outdoor recreation** (p. 93 of the CDP):

*The Council will normally permit development proposals for outdoor recreational use in the countryside where all the following criteria are met:*

- *It will not result in damage to sites of nature conservation importance or features of the archaeological and built heritage;*
- *It will not cause harm to the appearance and character of the local landscape and can be readily absorbed into its surroundings by taking advantage of existing vegetation and /or topography;*

- *The amenity of the people living nearby or the enjoyment of other countryside users is not adversely affected by the nature, scale, extent, frequency or timing of the recreational activities proposed including any noise or lighting likely to be generated;*
- *Any ancillary built development is small in scale, designed to a high standard and sympathetic to the surrounding environment in its siting, layout and landscape treatment.*
- *Consideration is given to access to the proposed facility by means of transport other than the private car and;*
- *The local road network can safely handle the extra traffic the proposal would generate and satisfactory arrangements are provided for access, parking, drainage, litter and water services.*

## **Opinion**

The criteria listed above represent normal planning considerations. These requirements are adequately covered by natural and built heritage policies, and landscape policies in Chapter 7, as well as by relevant development management standards in Chapter 13.

## **Recommendation**

No change to the Draft Plan and Environmental Report.

## **Issue no. 6**

### **Green infrastructure**

ATNWLA proposes an addition to the last sentence in **Subsection 7.1.1 Designated sites for nature conservation** (p. 103 of the Draft CDP), as follows (Note: the text in red is shown in red in the ATNWLA submission):

*This connectedness can be achieved through “green infrastructure”, **the strategically planned and interconnected networks of green space and water harnessed** for the benefit of both people and nature. **Green Infrastructure is designed and managed to provide:***

- ***a high-quality environment which will provide economic benefits by attracting inward investment and new business***
- ***high-quality open spaces which provide health and social benefits for people through the provision of play areas, safe and attractive areas and routes for meeting, walking and cycling***
- ***opportunities and space for contact with nature, which is considered essential for good health and wellbeing***
- ***adaptation to the impacts of climate change and flooding***
- ***opportunities for local food production in allotments, gardens and through agriculture***
- ***space for biodiversity (nature and wildlife) to flourish***
- ***a sense of place and local distinctiveness***

*The emergence of Green Infrastructure planning is a response to the growing recognition of the many benefits which green space provides to society and of the need to plan for its protection, provision and management in tandem with plans for growth and development. It has a significant role to play in assisting in the protection of Natura 2000 sites and biodiversity.*

It is also suggested to add a policy relating to green infrastructure to the policies regarding designated sites for nature conservation:

***P-DSNC-5 To prepare and support the implementation of a Green Infrastructure Strategy for County Sligo, as resources allow.***

### **Opinion**

It is agreed to provide a short explanation regarding the meaning of “green infrastructure”.

The suggested policy is in fact an objective that could be included as an additional general heritage objective (p. 101 of the Draft CDP).

### **Recommendation**

In **Chapter 7 Heritage**, add the following general heritage objective:

**O-H-3** Prepare and support the implementation of a Green Infrastructure Strategy for County Sligo, as resources allow.

With regard to the term “green infrastructure”, insert a footnote at follows:

Green Infrastructure can be broadly defined as a strategically planned network of high quality natural and semi-natural areas with other environmental features, which is designed and managed to deliver a wide range of ecosystem services and protect biodiversity in both rural and urban settings. (source: *Building a Green Infrastructure for Europe* – European Commission, 2013 – available at [http://ec.europa.eu/environment/nature/ecosystems/docs/green\\_infrastructure\\_broc.pdf](http://ec.europa.eu/environment/nature/ecosystems/docs/green_infrastructure_broc.pdf))

### **Issue no. 7**

#### **Hedgerows**

ATNWLA proposes the following additions to **Subsection 7.1.5 Trees, woodlands and hedgerows** (p. 108-109 of the Draft CDP):

##### ***7.1.5 Trees, woodlands, and hedgerows***

*Hedgerows constitute an important natural and historic resource, given their contribution to landscape quality, their ecological importance as wildlife habitats, **and wildlife corridors between habitats**, and historical significance as townland and field boundaries. **Hedgerows are afforded protection under the Wildlife (Amendment) Act, 2000, prohibiting the cutting of hedges within the bird nesting period (1st March - 1st September).***

##### ***Woodlands, trees and hedgerows policies***

*It is the policy of Sligo County Council to:*

**P-WTH-1** *Protect trees, woodlands and hedgerows from development that would impact adversely upon them. Promote new tree and woodland planting and the enhancement of existing hedgerows by seeking increased coverage, in conjunction with new development **using native species (of local provenance wherever possible).***

**P-WTH-2** ***Discourage the felling of mature trees to facilitate development and** where appropriate make use of tree preservation orders to protect important trees and groups of trees which may be at risk or have an important amenity or historic value.*

*P-WTH-3 Require the planting of native broadleaved species, and species of local provenance, in new developments as appropriate*

*P-WTH-4 Sligo County Council will promote the planting of native tree and shrub species, by committing to using native species (of local provenance wherever possible) in its landscaping work and on County Council property.*

## **Opinion**

The proposals are noted. It is agreed to insert the proposed additions to the third paragraph in Section 7.1.5 (p. 108) and to policies P-WTH-1 and P-WTH-2.

It is also agreed to include the proposed policies P-WTH-3 and P-WTH-4.

## **Recommendation**

In **Section 7.1.5 Trees, woodlands and hedgerows** (p. 108-109 of the Draft CDP), make the following changes:

### **7.1.5 Trees, woodlands and hedgerows**

Hedgerows constitute an important natural and historic resource, given their contribution to landscape quality, their ecological importance as wildlife habitats, [corridors between habitats](#) and historical significance as townland and field boundaries. [Hedgerows are afforded protection under the Wildlife \(Amendment\) Act, 2000, which prohibits the cutting of hedges during the bird nesting period \(1st March to 1st September\).](#)

### **Woodlands, trees and hedgerows policies**

It is the policy of Sligo County Council to:

- P-WTH-1** Protect trees, woodlands and hedgerows from development that would impact adversely upon them. Promote new tree and woodland planting and the enhancement of existing hedgerows by seeking increased coverage, in conjunction with new development [using native species of local provenance, where possible.](#)
- P-WTH-2** [Discourage the felling of mature trees to facilitate development and,](#) where appropriate, make use of tree preservation orders to protect important trees and groups of trees which may be at risk or have an important amenity or historic value.
- P-WTH-3** Require the planting of native broadleaved species, and species of local provenance, in new developments.
- P-WTH-4** Promote the planting of native tree and shrub species by committing to using native species (of local provenance wherever possible) in its landscaping works and on County Council property.

## **Issue no. 8**

### **Record of Protected Structures (RPS)**

ATNWLA proposes the inclusion of the following paragraph in **Subsection 7.3.1 The Record of Protected Structures (RPS)** (p. 119 of the Draft CDP):

*The National Inventory of Architectural Heritage (NIAH) survey for Sligo was published in 2006 ([www.buildingsofireland.ie](http://www.buildingsofireland.ie)). The planning authority is obliged to consider for inclusion in its Record of Protected Structures any buildings rated as being of Regional,*

*National or International importance by the NIAH and to give consideration to including structures rated of local importance. Sligo County Council will continue to process the addition to the RPS of all NIAH buildings recommended for inclusion by the Minister.*

### **Opinion**

It is considered unnecessary to include the above text in Section 7.3.1, because the introductory section of the separate document **Sligo Record of Protected Structures**, also under review, already contains extensive explanations regarding the NIAH and the process of adding items to the RPS.

### **Recommendation**

No change to the Draft Plan and Environmental Report.

### **Issue no. 9**

#### **Protection of non-habitable structures**

ATNWLA suggests additional text to be included in **Section 7.3.2 Protection of non-habitable structures**:

*Items of street furniture are an important part of our built and cultural heritage in both an urban and rural context. They are also important elements in establishing the character and interest of an area, whether designated an ACA or not. Such items could include the following; lamp standards, seats and benches, bollards, railings, street signs, freestanding or wall mounted post boxes, telephone kiosks, horse troughs, water pumps, drinking fountains, jostle stones, milestones, paving, kerbstones, cobbles and setts, pavement lights, coal hole covers, statues, plaques, gates and other monuments.*

### **Opinion**

Agreed.

### **Recommendation**

In **Section 7.3 Architectural heritage, Subsection 7.3.2 Protection of non-habitable structures** (p. 120 of the Draft CDP), insert the following:

Items of street furniture are part of the built and cultural heritage, and can contribute to the character and interest of an area, whether designated an ACA or not. Such items include lamp standards, seats and benches, bollards, railings, street signs, free-standing or wall-mounted post boxes, telephone kiosks, horse troughs, water pumps, drinking fountains, jostle stones, milestones, paving, kerbstones, cobbles and setts, pavement lights, coal hole covers, statues, plaques, gates etc.

### **Issue no. 10**

#### **Town and village streetscapes**

ATNWLA suggests additional text to be included in **Section 7.3.4 Town and village streetscapes**:

*Sligo's vernacular built heritage consists of buildings and settlements created using local materials and following local traditions, to meet the needs of local people. These structures are often undervalued because they do not represent 'great architecture', their associations*

*with the past and poverty, and a perception that they are obsolete and have no future potential.*

### **Opinion**

Noted and agreed.

### **Recommendation**

In Section 7.3.4 Town and village streetscapes (p. 120 of the Draft CDP), insert the following text immediately under the headline:

Sligo's vernacular built heritage consists of buildings created using local materials and following local traditions, to meet the needs of local people. These structures are often undervalued because they do not represent 'great architecture'.

### **Issue no. 11**

#### **Architectural heritage policies**

The following additional policies are proposed:

***P-ARH-6** To promote the retention and re-use of the vernacular built heritage through increasing public awareness of its potential for re-use and its adaptability to change.*

***P-ARH-7** To apply the conservation principles and guidelines in practice as set out in the ICOMOS Charter on the Built Vernacular Heritage (Mexico 1999) when considering proposals to adapt vernacular buildings to meet contemporary living standards and needs.*

### **Opinion**

It is agreed to include the proposed policies. In addition, the principles and guidelines of the ICOMOS charter should be included as an Appendix to the final Plan.

### **Recommendation**

In **Section 7.3 Architectural heritage**, add the following Architectural heritage policies (p. 121-122):

**P-ARH-6** Promote the retention and re-use of the vernacular built heritage through increasing public awareness of its potential for re-use and its adaptability to change.

**P-ARH-7** When considering proposals to adapt vernacular buildings to meet contemporary living standards and needs, require applicants to apply the conservation principles and guidelines set out in the ICOMOS Charter on the Built Vernacular Heritage (Mexico 1999) – refer to Appendix J of this Plan.

At the end of the Draft Plan, insert a new **Appendix J** with the following content:

#### **Appendix J – ICOMOS Charter**

Vernacular building is the traditional and natural way by which communities house themselves. It is a continuing process including necessary changes and continuous adaptation as a response to social and environmental constraints. The built vernacular heritage is the fundamental expression of the culture of a community, of its relationship with its territory.

The International Council of Monuments and Sites (ICOMOS) has ratified in 1999 a **Charter on the Built Vernacular Heritage**. The principles and guidelines contained in this Charter are set out below.

### **Principles of conservation**

1. The conservation of the built vernacular heritage must be carried out by multidisciplinary expertise while recognising the inevitability of change and development, and the need to respect the community's established cultural identity.
2. Contemporary work on vernacular buildings, groups and settlements should respect their cultural values and their traditional character.
3. The vernacular is only seldom represented by single structures, and it is best conserved by maintaining and preserving groups and settlements of a representative character, region by region.
4. The built vernacular heritage is an integral part of the cultural landscape and this relationship must be taken into consideration in the development of conservation approaches.
5. The vernacular embraces not only the physical form and fabric of buildings, structures and spaces, but the ways in which they are used and understood, and the traditions and the intangible associations which attach to them.

### **Guidelines in practice**

#### 1. Research and documentation

Any physical work on a vernacular structure should be cautious and should be preceded by a full analysis of its form and structure. This document should be lodged in a publicly accessible archive.

#### 2. Siting, landscape and groups of buildings

Interventions to vernacular structures should be carried out in a manner which will respect and maintain the integrity of the siting, the relationship to the physical and cultural landscape, and of one structure to another.

#### 3. Traditional building systems

The continuity of traditional building systems and craft skills associated with the vernacular is fundamental for vernacular expression, and essential for the repair and restoration of these structures. Such skills should be retained, recorded and passed on to new generations of craftsmen and builders in education and training.

#### 4. Replacement of materials and parts

Alterations which legitimately respond to the demands of contemporary use should be effected by the introduction of materials which maintain a consistency of expression, appearance, texture and form throughout the structure and a consistency of building materials.

#### 5. Adaptation

Adaptation and reuse of vernacular structures should be carried out in a manner which will respect the integrity of the structure, its character and form while being compatible with acceptable standards of living. Where there is no break in the continuous utilisation of vernacular forms, a code of ethics within the community can serve as a tool of intervention.

#### 6. Changes and period restoration

Changes over time should be appreciated and understood as important aspects of vernacular architecture. Conformity of all parts of a building to a single period will not normally be the goal of work on vernacular structures.

## 7. Training

In order to conserve the cultural values of vernacular expression, governments, responsible authorities, groups and organisations must place emphasis on the following:

- a) Education programmes for conservators in the principles of the vernacular;
- b) Training programmes to assist communities in maintaining traditional building systems, materials and craft skills;
- c) Information programmes which improve public awareness of the vernacular, especially amongst the younger generation.
- d) Regional networks on vernacular architecture to exchange expertise and experiences.

### **Issue no. 12**

#### **Electric vehicles**

ATNWLA proposes the following addition to the Strategic transport policies:

*SP-TRA-8 The Council will support the Government's target on Electric vehicles by facilitating the roll out of charging infrastructure for electric vehicles in line with the National Renewable Energy Action Plan's target for 10% of Ireland's vehicles to be electric by 2020.*

#### **Opinion**

Noted and agreed. Refer also to the CE's recommendations relating to the ESB's submission (no. 81).

#### **Recommendation**

In **Chapter 8 Transport and mobility**, add the following strategic transport policy (p. 129 of the Draft CDP):

**SP-TRA-8** Facilitating the roll-out of charging infrastructure for electric vehicles, in line with the *National Renewable Energy Action Plan's* target for 10% of Ireland's vehicles to be electric by 2020.

### **Issue no. 13**

#### **Rainwater harvesting**

It is suggested to include the following water supply policy:

*P-WS-6 Require rainwater harvesting and grey water recycling in new large scale developments and in smaller schemes including community facilities and domestic dwellings, except where not practical or feasible.*

#### **Opinion**

In the short-medium term, a strict requirement to harvest rainwater and recycle grey water has the potential to discourage the building of new housing in the County's towns and villages, where construction activity has been almost non-existent since the onset of the economic crisis.

Water supply policy P-WS-4 indicates that the Council will “facilitate the inclusion of water conservation and sustainability measures so as to minimise the use of potable water in new developments”.

In Chapter 13 Development management standards, Section 13.2.18 Energy efficiency (p. 220-221) also includes a guidance subsection on rain water harvesting. It is considered that these provisions are sufficient in the current circumstances.

### **Recommendation**

No change to the Draft Plan and Environmental Report.

### **Issue no. 14**

#### **Surface water drainage**

ATNWLA proposed the following policies:

***P-SWD-9** Require, where practicable, that hard surface areas (car parks, etc.) be constructed in permeable or semi-permeable materials*

***P-SWD-10** Require, where practicable, that all new developments (commercial, residential, community, etc.) include rainwater harvesting and/or grey water recycling in their design*

### **Opinion**

The proposed requirement for rain water harvesting is addressed under Issue 13 above.

In Chapter 13 Development management standards, Section 13.2.18 Energy efficiency (p. 220-221) includes a guidance subsection on managing flooding risk, which recommends the use of porous paving to allow water to percolate directly into the water table, thereby minimising the need for a formal drainage network. It is considered that these provisions are sufficient.

### **Recommendation**

No change to the Draft Plan and Environmental Report.

### **Issue no. 15**

#### **Undergrounding of cables**

ATNWLA proposes that in **Section 13.2.14 Undergrounding of cables** (p. 218 of the Draft Plan), the first paragraph should be modified as follows:

*The planning authority will seek to place underground all electricity, telephone and television cables in the urban built-up areas, especially within zones designated for residential development **and in ACA's**.*

### **Opinion**

Agreed.

## Recommendation

In **Section 13.2.14 Undergrounding of cables** (p. 218 of the Draft Plan), modify the first paragraph as follows:

The planning authority will seek to place underground all electricity, telephone and television cables in the urban built-up areas, especially within zones designated for residential development [and in Architectural Conservation Areas](#).

## Issue no. 16

### External illumination

It is proposed to modify the text in **Section 13.2.15 Illumination and spread of light** as follows:

*External illumination shall be minimised taking into account the minimum required for security and health and safety; therefore all external lighting:*

- *shall be properly cowled and directed away from the public roadway and shall also not be visible from any point more than 200 metres away from the light,*
- *shall be carefully and sensitively designed to minimise the incidence of light spillage or pollution into the surrounding environment*
- *shall not point upwards,*
- *shall be sensor controlled,*
- *should be energy efficient,*
- *shall be sensitive to protected species, where applicable.*

*Floodlighting will be discouraged in rural areas and discouraged as part of advertising schemes in urban areas.*

## Opinion

Agreed.

## Recommendation

Modify the text in **Section 13.2.15 Illumination and spread of light** (p. 218-219 of the Draft Plan) as follows:

External illumination [shall be carefully and sensitively designed to minimise the incidence of light spillage or light pollution into the surrounding environment](#). The design shall [be minimised](#) to take into account the minimum required for security and health and safety. Therefore all external lighting:

- shall be properly cowled and directed away from the public roadway and shall also not be visible from any point more than 200 metres away from the light,
- shall not point upwards,
- shall be sensor controlled,
- should be energy efficient,
- shall be sensitive to protected species, where applicable.

[Floodlighting in rural areas and as part of advertising schemes in urban areas will be discouraged.](#)

## Issue no. 17

### Rural-generated housing need

It is suggested to include an additional item to the list of documentation required from applicants for rural housing in *Rural Areas under Urban Influence*:

*In order to substantiate a rural housing need, the following documentation will be required:*

- *Land registry documentation proving family ownership of the envisaged site*
- *Map showing location of the principal family residence/original family home.*
- *Proof of link to the rural community in which the applicant wishes to reside*
- *Confirmation that planning for rural housing in the County has not previously been granted to the applicant within ten years of receipt of current application*
- *Any other details that may be deemed necessary by the Planning Authority, to be agreed at pre-planning stage.*

### Opinion

Refer to the CE's opinion and recommendation on Issue no. 2 of this submission.

### Recommendation

No change to the Draft Plan and Environmental Report.

## Issue no. 18

### Locating a house in the landscape

The following modifications are suggested for the text in **Section 13.4.2 Site selection – locating a house in the landscape**:

*The placing of a house in the landscape is one of the most important aspects of building in the countryside. The Planning Authority will have regard to the following when considering a planning application for a dwelling in a rural area:*

#### **A. The Landscape Characterisation Map** (refer to Section 7.4 Landscape Character)

*Applications for single houses will be assessed based on the landscape's capacity to absorb new development. The proposed house must not have a visual impact that would negatively affect the character of the area.*

*Direction should be taken from the historic building stock of the area, reflecting regional or local patterns in terms of scale, height, mass, form, layout, proportions, materials and architectural details/features.*

*Visual impact will be assessed according to the landscape designations indicated on the Landscape Characterisation Map.*

*The location of new houses in designated Visually Vulnerable Areas, in Sensitive Landscapes or along Scenic Routes will generally be discouraged. Exceptions may be made in the case of applicants who can demonstrate a need to reside in a particular area, in accordance with the housing policy in green belts and sensitive areas (refer to Section 5.3.1). However, new development must not obstruct scenic views available from or to the area adjoining the development site.*

*Sites which lead to ribbon development is not considered to be in the interest of the proper planning and sustainable development and is strongly discouraged*

#### **B. Site location**

*The location, siting, orientation and the design of a proposed new dwelling in a rural location should be sensitive to its surroundings and should seek to integrate as much as possible into the landscape and not be a prominent feature that visually dominates its rural surroundings. Dwellings which are dominant, intrusive, or incongruous in a rural setting, will not be permitted.*

*Those planning to build a house in the countryside should avoid elevated or exposed locations such as hill slopes, ridge lines or vast open landscapes where the new building would appear intrusive or break the skyline.*

*Cutting and carving of sites out of the existing landscape is not desirable and will be discouraged. A house should “nestle” into the site and not dominate the landscape or diminish the quality of scenic views of the surrounding countryside.*

*Sites should be sheltered, where possible, by established natural boundaries. Mature trees and hedgerows, **slopes and other natural features** can offer shelter, screening or backdrop to new houses **and should be retained where possible.***

*Full consideration should be given to solar gain. The orientation of the proposed dwelling and internal layout should seek to maximise energy efficiency.*

#### **Opinion**

The suggestions are noted and largely agreed. Ribbon development is addressed under Issue no. 3 of this submission.

#### **Recommendation**

In Section **13.4.2 Site selection – locating a house in the landscape** (p. 230 of the Draft Plan), modify the text as follows:

The placing of a house in the landscape is one of the most important aspects of building in the countryside. The Planning Authority will have regard to the following when considering a planning application for a dwelling in a rural area:

#### **C. The Landscape Characterisation Map** (refer to Section 7.4 Landscape Character)

Applications for single houses will be assessed based on the landscape's capacity to absorb new development. The proposed house must not have a visual impact that would negatively affect the character of the area. **Direction should be taken from the historic building stock of the area, reflecting local patterns in terms of scale, height, mass, form, layout, proportions, materials and architectural details.**

Visual impact will be assessed according to the landscape designations indicated on the Landscape Characterisation Map.

The location of new houses in designated Visually Vulnerable Areas, in Sensitive Landscapes or along Scenic Routes will generally be discouraged. Exceptions may be made in the case of applicants who can demonstrate a need to reside in a particular area, in accordance with the housing policy in green belts and sensitive areas (refer to Section 5.3.1). However, new development must not obstruct scenic views available from or to the area adjoining the development site.

#### D. Site location

The siting of a dwelling in a rural location should seek to integrate the new structure into the landscape. Dwellings should not be dominant, intrusive, or incongruous in a rural setting.

Those planning to build a house in the countryside should avoid elevated or exposed locations such as hill slopes, ridge lines or vast open landscapes where the new building would appear intrusive or break the skyline.

Cutting and carving of sites out of the existing landscape is not desirable and will be discouraged. A house should “nestle” into the site and not dominate the landscape or diminish the quality of scenic views of the surrounding countryside.

Sites should be sheltered, where possible, by established natural boundaries. Mature trees and hedgerows, background slopes and other natural features can offer shelter, screening or backdrop to new houses. These features should be retained and integrated into the site layout, as appropriate.

Full consideration should be given to solar gain. The orientation of the proposed dwelling should seek to maximise energy efficiency.

#### Issue no. 19

##### Signage

ATNWLA proposes that in Section 13.5.9 Shopfronts and signage (p. 239 of the Draft Plan), the following standards should be added to the list:

##### *Signage*

*A. Signs should not clutter or dominate the façade of a building, nor the entire street frontage, and should not detract from or obscure architectural features of the building*

.....

*I. Plastic/Vinyl banner-type signs on the exterior of buildings will be discouraged.*

*J. Projecting signs, banners and flagpoles will be restricted in size and number to prevent clutter.*

*K. Only natural, high-quality materials (e.g. wood, metal etc.) will be permitted in ACA’s and other sensitive areas.*

*L. Signs shall not obscure architectural features or details and will not be permitted above eaves or parapet levels or to project above the roofline of buildings.*

##### Opinion

Agreed. Following the insertion of the items above, the entire subsection 13.5.9 will be renumbered.

##### Recommendation

In Section 13.5.9 Shopfronts and signage (p. 239 of the Draft Plan), add the following standards to the existing list:

##### Signage

A. Signs should not clutter or dominate the façade of a building, nor the entire street frontage, and should not detract from or obscure architectural features of the building

.....

- I. Plastic or vinyl banner-type signs on the exterior of buildings will be discouraged.
- J. Projecting signs, banners and flagpoles will be limited in size and number to prevent clutter.
- K. Only high-quality materials (e.g. wood, metal etc.) shall be used in Architectural Conservation Areas and other sensitive areas.
- L. Signs shall not be placed above eaves or parapet levels and shall not project above the roofline of buildings.

## Issue no. 20

### Entrances to rural house sites

The following changes are proposed to the rural housing subsection of **Section 13.8.3 Entrances and sightlines**:

#### ***Rural housing***

*Proposed vehicular access points will be carefully considered by the Planning Authority with a view to minimising the impact of a safe access on the visual appearance and rural characteristics of the area.*

*There may be circumstances where it is desirable to seek alternative access points or consider alternative sites in order to avoid excessive removal of good quality traditional roadside boundaries.*

***Front boundary treatments shall consist of indigenous hedgerows, earth banks or dry stone walls, in character with the vernacular boundaries in the area (text in red to be deleted).***

***Retain hedgerows, and other distinctive boundary treatment such as stone walls, when undertaking, authorising or approving development***

***Where the loss of the existing boundary is unavoidable as part of development, ensure that a new hedgerow is planted using native species of local provenance to replace the existing hedgerow and/or that boundary walls are rebuilt using only local stone and local vernacular design.***

*The design of entrance gates should be in keeping with the rural setting. Applications for a dwelling in a rural area should include detailed drawings and specifications for entrance treatments, to include proposed lighting. The roadside boundary should ideally consist of a sod and stone wall/earth mound planted with a double row of native hedgerow species e.g. Hawthorn, field maple, holly, blackthorn, hazel etc. Block walls, ornamental features and the use of non-local finishes, e.g. stone, brick, etc., will be discouraged.*

## Opinion

It is agreed to include additional guidance regarding boundary treatments for rural house sites.

## Recommendation

In Section **13.8.3 Entrances and sightlines** (p. 248 of the Draft Plan), modify the **Rural housing** subsection as follows:

## Rural housing

Proposed vehicular access points will be carefully considered by the Planning Authority with a view to minimising the impact of a safe access on the visual appearance and rural characteristics of the area.

There may be circumstances where it is desirable to seek alternative access points or consider alternative sites in order to avoid excessive removal of good quality traditional roadside boundaries.

Hedgerows and other distinctive boundary treatment such as stone walls shall be retained insofar as is possible.

~~Front boundary treatments~~ Where the loss of the existing boundary is unavoidable as part of new development, the new roadside boundary shall consist of indigenous hedgerows, earth banks or dry stone walls, in character with the vernacular boundaries in the area.

The new hedgerows shall be planted with a double row of native species of local provenance, e.g. Hawthorn, holly, blackthorn, hazel etc.

New boundary walls shall be built in local vernacular style, using recovered stone from the old walls or other local stone. Block walls and the use of non-local finishes, such as bricks, will be discouraged.

Yvonne Jackson  
Failte Ireland

**Issue no. 1**

Failte Ireland states its support for the Draft Plan and makes several suggestions for additions or modifications to the Plan in order “*enhance the policy coverage*” in the Plan to “*ensure a meaningful framework is established for the enhancement of tourism in the County*”. A number of amendments to the text and policies of the Draft CDP are proposed.

Y. Jackson also provides an update relating to tourist accommodation in counties Sligo, Donegal and Mayo.

**Opinion**

The recommendations made by Failte Ireland in respect of the Draft CDP are noted. It is considered that the existing policies and objectives in the Draft Plan are sufficient to promote and facilitate the development of tourism in the County. The proposed changes are either considered unnecessary or are already adequately addressed in the Draft Plan.

The suggested updates to Section 4.4.2 to reflect 2015 figures are noted. It is considered appropriate to make these changes.

**Recommendation**

In **Section 4.4. Tourism Development**, modify **Section 4.4.2 Trends and assumptions for the future** (p. 47 of the Draft Plan) as follows (additions in **blue**, deletions in **red**):

~~In 2014, the county had 127 accommodation units (of which 15 hotels), compared to 457 units in Co. Donegal (54 hotels) and 316 in Co. Mayo (45 hotels). There were 2,719 tourist beds in Sligo, compared to 6,813 in Donegal and 5,681 in Mayo~~

In 2015, the county had 61 accommodation premises (of which 14 hotels), compared to 137 in Co. Donegal (53 hotels) and 166 in Co. Mayo (44 hotels). There were 4,314 tourist beds in Sligo, compared to 10,288 in Donegal and 10,240 in Mayo.

Michael Murphy, Development Applications Unit  
Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs

**Issue no. 1**

**Terminology**

The Department notes that the terms “*Habitat Directive Assessment*” and “*Natura 2000 sites*” are used and/or defined in ways that are inconsistent with Part XAB of the Planning and Development Act 2000 (as amended) and with the 2011 Regulations. It is recommended that terminology be used in a manner that is consistent with the relevant legislation, and corrected or amended where necessary throughout the final Plan and environmental assessment documentation.

**Opinion**

The submission does not provide specific examples of where terminology has been used inconsistently in the Draft Plan. It is noted that the terms “*Habitat Directive Assessment*” and “*Natura 2000 sites*” are not consistent with Part XAB Section 177R of the Planning and Development Act 2000 (as amended), which utilises the terms ‘*appropriate assessment*’ and ‘*site*’ or ‘*European site*’ respectively.

**Recommendations**

- A.** Throughout the final Plan, replace ‘*Habitats Directive Assessment*’ with ‘*Appropriate Assessment*’ and ‘*Natura 2000 sites*’ with ‘*European Sites*’, where appropriate.
- B.** In **Section 7.1 Natural heritage**, subsection **7.1.1. Designated sites for nature conservation** (p. 103 of the Draft Plan), modify the text of policy P-DSNC-3 as follows:

**P-DSNC-3** Carry out an appropriate level of assessment for all development plans, land-use plans and projects # that the Council authorizes or proposes to undertake or adopt, to determine the potential for these plans/projects to impact on designated sites, or proposed designated sites, in accordance with the Habitats Directive. All appropriate assessments shall be in compliance with the provisions of Part XAB of the Planning and Development Act 2000.

**Issue no. 2**

**Appropriate assessment – conclusion of the Screening Report**

The Department notes the conclusions of the Habitats Directive Assessment Screening Report prepared in conjunction with the Draft CDP, i.e. that the implementation of the proposed Draft CDP will not have a significant effect on the Natura 2000 network, and Stage 2 Appropriate Assessment is not required at this stage in the plan-making process. The Department notes that these conclusions are inconsistent with the information and analyses presented in appendices and tables that follow.

Tables A.1 to A.11 identify a number of Plan policies or objectives that have the potential for significant effects on European sites, together with the required mitigation which, in many instances, is in the form of listing the protective policies and objectives in the Plan.

The submission states that “*Where mitigation measures are deemed to be necessary to avoid likely significant effects on a European site in view of its conservation objectives, this is usually established at a stage when such effects are being assessed rather than screened*”.

The Department's view is that *"the need for an appropriate assessment cannot be excluded at this point"* and that *"if required, the appropriate assessment must be carried out before the plan may be adopted"*.

### **Opinion**

The appropriate assessment's conclusion that there will be no significant effect on European Sites arising from the implementation of the Draft Plan, alone or in combination with other plans or projects, is supported by the information and analyses presented in Tables A.1 to A.11.

Where policies or objectives are identified as having the potential for significant effects on European Sites, reference is made to other Draft Plan policies and objectives that provide a strong protective framework, designed to avoid significant effects on any European Site. The existing provisions of the Draft Plan are not mitigation measures. They are part of the overall sustainable planning approach adopted by the Draft Plan.

In light of the above, it is considered that the provisions of the Draft Plan and associated Appropriate Assessment address the issues highlighted in the Department's submission.

### **Recommendation**

No change to the Draft Plan and Environmental Report.

### **Issue no. 3**

#### **Appropriate assessment – likely effects of policies and objectives on European sites**

The Department has concerns regarding the likely effects of some of the Plan policies and objectives on European sites. The following examples are given:

***P-TOU-4** Provide signposting, interpretive signs, information boards and improve roads, existing amenity and viewing areas and provide for car parking, public facilities and access in scenic areas.*

***O-CW-1** Develop cycle routes from Ballysadare and Collooney to Sligo City.*

**Banada Mini-Plan** – objectives for the development of river walks, pedestrian and cycle links along the banks of the River Moy (SAC). Some lands within the River Moy SAC are zoned for existing community uses.

**Ballincar Mini-Plan** – objectives for the development of coastal walks, pedestrian and cycle links along the SAC; objective to facilitate the further development of the Radisson Hotel; objective to promote and encourage additional tourism and recreation-related local enterprise initiatives.

**Ballysadare Mini-Plan** – objectives for the development of riverside walks and river crossings, pedestrian and cycle links along the SAC and industrial development associated with the quarry at Abbeystown.

### **Opinion**

In screening the Draft Plan for appropriate assessment, regard was had to the provisions of Article 6(3) of the Habitats Directive which provides that:

*'Any plan or project not directly connected with or necessary to the management of the [Natura 2000] site but likely to have a significant effect thereon, either individually or in combination with other*

*plans or projects, shall be subjected to an appropriate assessment of its implications for the site in view of the site's conservation objectives.'*

The appropriate assessment's conclusion that there will be no significant effect on European Sites arising from the implementation of the Draft Plan, alone or in combination with other plans or projects, is supported by the information and analyses presented in Tables A.1 to A.11. Where policies or objectives are identified as having the potential for significant effects on European Sites, reference is made to other Draft Plan policies and objectives that provide a strong protective framework, designed to avoid significant effects on any European Site.

The various policies and objectives of the Draft Plan should not be considered in isolation, but holistically and in concert with the relevant policies and objectives set out in Chapter 7 (Heritage).

In light of the above, it is considered that the provisions of the Draft Plan and associated Appropriate Assessment address the issues highlighted in the Department's submission.

### **Recommendation**

No change to the Draft Plan and Environmental Report.

### **Issue no. 4**

#### **Appropriate assessment – Plan-level mitigation**

Having welcomed the Draft Plan policies and objectives for nature conservation and environmental protection, the Department notes that these are identified as part of the plan-level mitigation in the Screening Report, and the other key element of plan-level mitigation is to require all future plans and projects to comply with legislation and be subject to screening, assessment and regulation requirement, as necessary.

It is noted that this limited mitigation is not always applied, i.e. there are references to the need to comply with the Habitats Directive in some policies, but not in others.

It is recommended that, if future compliance of plans and projects is used as a mitigation measure, the wording should be consistent across all the policies and objectives.

### **Opinion**

It should be clarified early in the Plan that all the policies and objectives for development are subject to compliance with the requirements of the Habitats Directive, Birds Directive, EIA Directive and relevant national legislation.

With regard to "mitigation", please refer to the Chief Executive's opinion on Issue no. 2 above.

The various policies and objectives of the Draft Plan should not be considered in isolation, but holistically and in concert with the relevant policies and objectives set out in Chapter 7 (Heritage).

It is considered that the provisions of the Draft Plan and associated Appropriate Assessment address the issues highlighted in the Department's submission.

### **Recommendation**

In the introduction to **Chapter 3 County Sligo: Core Strategy**, insert and **highlight** the following text after the last paragraph on p. 15 of the Draft Plan:

**All the policies and objectives for development contained in Volume 1 and Volume 2 of this Plan are subject to compliance with the requirements of the Habitats Directive and, where relevant, those of the Birds Directive, EIA directive and relevant national legislation.**

**Issue no. 5****Flooding**

The Strategic Flood risk Assessment is noted. The Department advises that, should the SFRA need to be revised as a result of comments made by the OPW or other relevant organisations, this should be reflected in the Plan and subjected to any necessary environmental assessments.

**Opinion**

Noted. No submission was received from the OPW.

**Recommendation**

No change to the Draft Plan and Environmental Report.

**Issue no. 6****Reference to the appropriate assessment process**

The Department notes, within the main body of the Plan, the lack of direct reference to the appropriate assessment process, including the screening report and its outcome.

**Opinion**

Noted. It is proposed to expand Chapter 2 of the Draft Plan with a section summarising the appropriate assessment process and presenting the conclusion of the Screening Report. Chapter 2 shall be renamed accordingly.

**Recommendation**

In the final Plan, change the name of **Chapter 2 (Strategic Environmental Assessment (SEA))** to **Chapter 2 (Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA))**, and insert a subsection summarising the appropriate assessment process and its conclusion.

**Issue no. 7****Strategic Environmental Assessment**

The Strategic Environmental Objectives SEO B1, SEO B2 and SEO B4 are noted and welcomed. It is suggested that these SEOs are expanded to include habitats and species protected by the Wildlife Act (as amended) and those of note at county level (not limited to Article 10 of the Habitats Directive).

**Opinion**

Strategic Environmental Objectives need to be easily measurable from existing data sources. There is nothing available at present to accommodate this.

**Recommendation**

No change to the Draft Plan and Environmental Report.

## Submission no. 78

30 November 2016

Gael Gibson, Principal Planner  
Planning and Environmental Unit, Grid Development, Eirgrid

### Issue no. 1

The submission welcomes the strategic energy policies SP-EN-1 to SP-EN-7 of the Draft Plan.

### Opinion

The support is noted.

### Recommendation

No change to the Draft Plan and Environmental Report

### Issue no. 2

G. Gibson suggests updated text for Section 11.1.7 Electricity transmission (p. 191 of the Draft CDP) in relation to GRID25, EirGrid's development strategy, which was published in 2008 and is due for review. The submission also refers to the White Paper on Energy Policy Framework 2015-2030, which "*sets out Ireland's energy future and confirms the core objectives of sustainability, security of supply and competitiveness*".

### Opinion

The suggestions for updated text are noted and agreed.

### Recommendation

In **Section 11.1.7 Electricity transmission** (p. 191 of the Draft CDP), add the following text (shown in blue):

#### 11.1.7 Electricity transmission

The transmission network ...

A major investment in the high-voltage electricity transmission system is currently underway. Grid25, EirGrid's roadmap to upgrade the electricity transmission grid by 2025, ~~continues to be implemented so as to increase the capacity of the grid, to satisfy future demand and to help Ireland meet its target of 40% of electricity from renewable sources by 2020~~ was published in 2008 and is due for review. A draft strategy entitles "Your Grid, Your Views, Your Tomorrow" was published for consultation in March 2015, and a new Grid Development Strategy is to be published in 2017.

With regard to the Grid25 Implementation Programme, EirGrid is currently preparing a new Grid Implementation Plan.

The North-West region is rich in renewable energy resources (e.g. ocean and wind energy), which are concentrated along the western coastline. The existing transmission network is predominantly lower capacity (110 kV) with insufficient 220-kV and no 400-kV transmission infrastructure. Developing the grid will enable the transmission system to safely accommodate power flows from surplus regional generation and also to facilitate future growth in electricity demand.

The 2015 Energy White Paper recognises the need for the development and renewal of energy networks to meet economic and social goals and endorses the strategic programmes of energy infrastructure providers.

**Submission no. 80**

30 November 2016

Dr Tara Higgins, Scientific Officer, SEA Section  
Office of Environmental Assessment, Environmental Protection Agency

**Issue no. 1**

This submission is intended to promote full and transparent integration of both the Plan-making and SEA processes as well as promoting full compliance with the requirements of the SEA Directive and the SEA Regulations.

The EPA recently published the State of the Environment (SoE) report - *Ireland's Environment – An Assessment 2016* (EPA, 2016). Chapter 13 of the report identifies the key challenges for Ireland, and the associated key actions required to address them, as follows:

**Environment and Health & Wellbeing:** Recognition of the benefits of a good quality environment to health and wellbeing.

**Climate Change:** Accelerate mitigation actions to reduce greenhouse gas emissions and implement adaptation measures to increase our resilience in dealing with adverse climate impacts.

**Implementation of Legislation:** Improve the tracking of plans and policies and the implementation and enforcement of environmental legislation to protect the environment.

**Restore & Protect Water Quality:** Implement measures that achieve ongoing improvements in the environmental status of water bodies from source to the sea.

**Sustainable Economic Activities:** Integrate resource efficiency and environmental sustainability ideas and performance accounting across all economic sectors.

**Nature & Wild Places:** Protect pristine and wild places that act as biodiversity hubs, contribute to health and wellbeing and provide sustainable tourism opportunities.

**Community Engagement:** Inform, engage and support communities in the protection and improvement of the environment.

The Plan should include relevant Policies and Objectives to address, where appropriate, the key environmental challenges and actions for Ireland outlined above. The full SoE report is available at: [www.epa.ie/irelandsenvironment/stateoftheenvironmentreport/](http://www.epa.ie/irelandsenvironment/stateoftheenvironmentreport/)

**Opinion**

The Draft Plan already includes relevant policies and objectives addressing the key environmental challenges for County Sligo and Ireland, the same as those highlighted in the SoE 2016 report. County Sligo's Local Economic and Community Plan 2016 contains complementary objectives and specific actions in the same areas.

**Recommendation**

No change to the Draft Plan and Environmental Report.

# Specific comments on the Draft Plan

## **Issue no. 2**

### **Chapter 2. Strategic Environmental Assessment (SEA)**

The EPA acknowledges and welcomes the fact that many of the issues raised in its SEA Scoping submission, dated 16th June 2015, have been incorporated into the Plan (and SEA ER). While it notes the inclusion in the Plan of section **2.4 Scoping the assessment**, there is merit in providing a short summary of the submissions received and how the key issues raised have been considered in the Plan (and associated SEA).

#### **Opinion**

The observation is noted and agreed.

#### **Recommendation**

Prepare a brief summary of the EPA scoping submissions received at pre-draft stage and include it in Section 2.4 of the final Plan.

## **Issue no. 3**

The EPA notes what appears to be a numbering error in the SEA Environmental Report, where section 2.5 Evaluation of the Draft CDP should be numbered 2.6 instead.

#### **Opinion**

The numbering error appears in the Draft Plan, not in the Environmental Report.

#### **Recommendation**

The error will be rectified before publishing the adopted CDP.

## **Issue no. 4**

The EPA suggests that Chapter 2 could be expanded further to provide a summary of key outputs from the SEA, Appropriate Assessment and Strategic Flood Risk Assessment processes which influenced the Plan policies and objectives, including key mitigation measures.

#### **Opinion**

As indicated in Section 2.3 Environmental Report (p. 13 of the Draft CDP), the same team of planners plus heritage officer prepared the Draft CDP 2017-2023, the SEA of the Draft Plan, the Appropriate Assessment and the Flood Risk Assessment. As a consequence, it was unnecessary to review or mitigate the Draft Plan policies and objectives based on the above-mentioned assessments, because they were being prepared simultaneously.

Any proposed amendments to the Draft CDP will be assessed for potentially significant environmental effects and mitigation measures will be recommended, where appropriate. This process will be presented in an Addendum to the initial Environmental Report. The Addendum will accompany the proposed amendments on public display for the last state of consultation.

Chapter 2 of the final Plan will include a summary of the whole process.

## **Recommendation**

In Chapter 2 of the final Plan, include a subsection summarising the key outputs from the SEA, Appropriate Assessment and Strategic Flood Risk Assessment processes which influenced the Plan policies and objectives.

### **Issue no. 5**

#### **Chapter 3. Core Strategy**

The EPA acknowledges the commitment given in the Core Strategy to prepare a new Local Area Plan (LAP) for Sligo and Environs (expected 2018) and to review the LAPs for the key support towns of Ballymote, Enniscrone and Tobercurry. The requirements of the SEA, Floods, Water Framework and Habitats Directives and associated relevant national regulations and guidelines, in particular, should be taken into account in preparing these LAPs.

#### **Opinion**

The recommendations are noted and will be followed at the time of reviewing LAPs and preparing new ones.

#### **Recommendation**

No changes to the Draft CDP and Environmental Report.

### **Issue no. 6**

#### **Section 3.7.4 Monitoring and reporting**

With regards to monitoring the implementation of Plan objectives, the EPA notes the intention to prepare a Progress Report within two years of the adoption of the Plan and again upon the commencement of the next review of the CDP in 2021. Linking the Plan implementation review and SEA related monitoring and reporting will assist in assessing the contribution of the Plan to protecting environmental sensitivities and vulnerabilities in the Plan area.

In this context, the EPA recommends that the SEA-related monitoring programme, as described in Section 10 – Monitoring Measures of the SEA ER, is incorporated into the Plan. This will provide a methodology for assessing how effective the SEA mitigation measures are at protecting environmental sensitivities/vulnerabilities within the Plan area over the lifetime of the Plan.

#### **Opinion**

The recommendation is noted and agreed.

#### **Recommendation**

In **Section 3.7.4 Monitoring and reporting** of the final Plan, include a reference to the monitoring measures describe in Section 10 of the Environmental Report and summarised in Table 10.1 of the ER.

## Issue no. 7

### Section 9.5 Waste management

In relation to the historic landfills located within the Plan area, as discussed in the Agency's Scoping Submission, the Plan (and associated SEA) should clarify how the Plan intends to take these into account. Where particular plans are responsible for the appropriate remediation of these historic landfills, these could be referred to.

#### Opinion

The EPA's scoping submission (received on 16 June 2016, before the preparation and publication of the Draft CDP and associated ER) included the following statement:

*"Historic Landfill Sites within the Plan area*

The EPA's LEMA (Licensing, Enforcement, Monitoring and Assessment) system identifies thirteen historic landfill sites within the Plan area. A commitment should be included in the Plan requiring the *EPA Code of Practice: Environmental Risk Assessment for Unregulated Waste Disposal Sites (April 2007)* to be taken into consideration and that any potential for future proposals re-zoning/development of these lands or adjacent to these lands be 'most appropriate to the potential sensitivities'. Where landfills meet the definition of a 'closed landfill', as defined in the Waste Management (certification of historic unlicensed waste disposal and recovery activity) Regulations 2008 (S.I. No 524 of 2008), there may be merit in including a reference to the requirement for authorisation of the landfill by the Agency under those regulations. These sites should be taken into account in the context of the SEA process."

Historic landfills are the landfills that were in operation in the period 1977-1997. Appendix F of the Waste Management Plan 2015-2021 for the Connacht-Ulster Region lists only three historic and legacy landfill sites in County Sligo: Finisklin (class A/high environmental risk) Marlow (class B/moderate environmental risk) and Tobercurry (Class C/low environmental risk). The sites at Finisklin and Marlow (near Ballymote) are known as former local authority landfills. The site at Tobercurry was never used by the local authority and its exact location and extent have not been established

#### Finisklin

The former Finisklin landfill, located on the western edge of Sligo City, beside the Docklands area, was operated by Sligo County Council between 1958 and 1994.

In 2010-2011, Sligo County Council commissioned a preliminary assessment of the environmental contamination risks associated with the former Finisklin landfill site. The report concluded that there would be little or no restrictions on the type of development that could take place on the older parts of the former landfill, while the level of restrictions would increase significantly towards the northern areas, which were filled more recently.

The report also recommended that further landfill gas investigation and risk assessment should be undertaken prior to any site development works, depending on the sensitivity of the proposed development to potential landfill gas.

The final stage of the certification process and remediation of the Finisklin site, in accordance with the *EPA Code of Practice: Environmental Risk Assessment for Unregulated Waste Disposal Sites (April 2007)*, is due to commence in 2017.

With regard to the former landfill at Finisklin, the Sligo and Environs Development Plan 2010 (now incorporated into the Sligo County Development Plan 2011 and into the Draft CDP 2017) policy **P-WM-14** and objective **O-WM-7** (p. 120/121 of the SEDP) are considered relevant to any development proposals on the site:

**P-WM-14** *Ensure that the known waste disposal site at Finisklin is assessed and an appropriate remediation plan is developed and implemented in order to reduce the environmental risk associated with the former landfill.*

**O-WM-7** *In relation to any proposals for development on lands at the Finisklin landfill site, or any other lands that may be contaminated (e.g. reclaimed/filled lands formerly used for port-related activities or the site of the former Saehan factory at Hazelwood), require the applicants to engage specialist environmental consultants to investigate and assess the presence and extent of contamination, and to recommend remediation measures for agreement with the local authority.*

The above policies, which are location-specific, will be revised and updated, following the completion of the certification and remediation process due to commence in 2017. before inclusion in the future Sligo and Environs Local Area Plan, as appropriate.

### **Marlow**

The site at Marlow is located within the buffer zone/green belt established by the Ballymote Local Area Plan 2012-2018. Having regard to the restricted range of land uses permissible in the buffer zone/green belt, it is considered that the zoning is appropriate to the potential sensitivities. A closure plan for Marlowe was put in place by the Local Authority before the publication of the relevant EPA Code of Practice. No further investigations are planned for the Marlowe site at this stage.

### **Recommendation**

Section **9.5 Waste management** of the Draft CDP should include an additional subsection **9.5.6 Historic landfills**, providing information on the Finisklin and Marlow sites.

Three additional waste management policies should also be included, as follows:

**P-WM-6** Require any development proposals on known historic landfill sites or in their vicinity shall take into consideration the *EPA Code of Practice: Environmental Risk Assessment for Unregulated Waste Disposal Sites (April 2007)*. Where landfills meet the definition of a 'closed landfill', as set out in the *Waste Management (certification of historic unlicensed waste disposal and recovery activity) Regulations 2008* (S.I. No 524 of 2008), there will be a requirement for authorisation of the landfill by the EPA under those regulations.

**P-WM-7** Ensure that the zoning or the rezoning of known former landfill sites, as part of the preparation or review of local area plans, is the most appropriate having regard to the potential sensitivities of such lands.

**P-WM-8** Development proposals on brownfield sites – such as former petrol stations, fuel/chemical storage areas and similar sites – shall be required to undertake an assessment if the potential for contaminated materials, soils etc to be unearthed during demolition/construction works, and the associated environmental risks.

Where any environmental risk is identified, appropriate investigations shall be undertaken to determine the nature and extent of any materials or contaminated soils on the proposed development sites.

A site-specific remediation plan shall be prepared to ensure that the construction and operation phases of development do not result in risk to human health, water quality, biodiversity, fisheries, air quality etc.

The following waste management objective should be added:

- O-WM-1** Ensure that the certification and remediation process of the known historic landfill at Finisklin is completed in accordance with the *EPA Code of Practice: Environmental Risk Assessment for Unregulated Waste Disposal Sites (April 2007)*

## **Issue no. 8**

### **Section 10.6 Climate Change**

The EPA notes the reference in section 10.6.2 to the preparation of the National Mitigation Plan which is currently ongoing, responsibility for which has now transferred to the Department of Communications, Climate Action and Environment (DCCA). This plan seeks to reduce greenhouse gas emissions across a range of sectors (transport, energy, agriculture etc.) in collaboration with other government including the Department of Transport, Tourism and Sport (DTTAS), and the Department of Agriculture, Food and the Marine (DAFM).

The Plan should ensure that the relevant aspects of this plan will be incorporated, as relevant and appropriate, upon its adoption.

#### **Opinion**

Noted and agreed.

#### **Recommendation**

The reference to the National Mitigation Plan should be updated by indicating that the responsibility for its preparation has been transferred to the DCCA.

An additional narrative should be inserted stating that relevant aspects of the adopted NMP may be incorporated into the CDP, if necessary, by means of a variation.

## **Issue no. 9**

The Plan should also consider establishing and implementing a climate change adaptation strategy to assist in the reduction of greenhouse gases and promote the transition to a low carbon society. The EPA has recently published guidance to support local authorities in developing local climate adaptation strategies. This guidance is available at:

[www.epa.ie/pubs/reports/research/climate/researchreport164.html](http://www.epa.ie/pubs/reports/research/climate/researchreport164.html).

This guidance will help to inform the preparation of a Climate Adaptation Strategy for the county.

#### **Opinion**

The Draft CDP already includes a policy, **P-CAM-2** (p. 182 of the Draft Plan), to prepare a Climate Change Adaptation Strategy in compliance with national guidance.

#### **Recommendation**

No change to the Draft CDP and Environmental Report.

## **Issue no. 10**

### **Section 10.7 Flood Risk Management**

The EPA notes the supporting Strategic Flood Risk Assessment and the commitments in the Plan to ensuring that zoning and development remains consistent with the requirements of the Flood Risk Management Guidelines (DECLG, 2009). The submission further notes and welcomes the intention to integrate the findings of the Catchment Flood Risk Assessment and Management (CFRAM) studies, once finalised, into the Strategic Flood Risk Assessment.

It is noted that the Strategic Flood Risk Assessment recommends rezoning or de-zoning lands in the case of a number of villages identified as being at significant flood risk (Flood Zone A or B).

The zoning in the relevant Mini-Plans should reflect the recommendations of the SFRA.

#### **Opinion**

As the review of the existing Mini-Plans was undertaken in parallel with the preparation of the SFRA, the draft zoning accurately reflects the relevant recommendations of the SFRA.

#### **Recommendation**

No change to the Draft CDP and Environmental Report.

## **Issue no. 11**

It is noted that in Table 5.A of the SFRA, under “Villages where selected sites should be de-zoned or re-zoned to avoid potential flood risk”, Riverstown is listed twice, which would appear to be a typographical error. The supporting text referring to “eight villages” may need to be amended accordingly.

#### **Opinion**

The error is noted and will be rectified before publishing the final version of the SFRA upon adoption of the CDP 2017-2023.

#### **Recommendation**

No change to the Draft CDP and Environmental Report.

## **Issue no. 12**

### **Section 11.1 Energy**

As recommended in the EPA’s Scoping Submission, the Plan should consider including a policy or objective, to prepare an Energy Conservation Strategy and associated awareness campaign within the Plan area. Specific timescales should be assigned to the preparation of such a strategy. Relevant guidance can be found on the website of Sustainable Energy Ireland: [www.seai.ie](http://www.seai.ie).

#### **Opinion**

The EPA’s Scoping Submission indicated the following:

*It would be useful to consider including in the Plan, as appropriate, a Policy/Objective relating to the preparation/implementation of “An Energy Conservation Strategy” and associated*

*awareness campaign within the Plan area. Specific timescales should be assigned to the preparation of such a strategy. The Plan should promote, where appropriate, the use of renewable energy systems (e.g. solar, wind, geothermal etc.) within the Plan area. The Plan should also provide for promotion of energy conservation measures in buildings. Relevant guidance can be found on the website of Sustainable Energy Ireland: [www.sei.ie](http://www.sei.ie).*

It is noted that the guidance available at [www.seai.ie](http://www.seai.ie) relates to “Local Authorities Renewable Energy Strategies”, not to Energy Conservation Strategies.

The EPA’s recommendations regarding promotion of the use of renewable energy systems and of energy conservation measures in buildings have already been incorporated into the Draft Plan, as follows:

- **Chapter 11 Energy and telecommunications** contains six sections relating to renewable energy.
- **Section 11.1.9 Energy efficiency** (p. 191 of the Draft Plan) includes two policies that promote higher energy performance in existing and new buildings.
- **Section 13.12.18 energy efficiency** (Development management standards) sets out guidelines for the sustainable design, siting and construction of buildings with regard to energy efficiency and conservation.

The provisions of the Draft Plan with regard to energy efficiency are considered sufficient. A separate, stand-alone Energy Conservation Strategy is not necessary.

### **Recommendation**

No change to the Draft Plan and Environmental Report.

### **Issue no. 13**

#### **General comment - additional policies/strategies/studies**

The EPA notes commitments in the Plan to preparing and implementing a number of additional policies/strategies/studies, including:

- An integrated and sustainable tourism strategy
- Invasive species study
- County Habitat Mapping Programme (to be continued)
- Climate change adaptation strategy

Consideration should be given to the inclusion of a commitment that these plans/strategies/studies will be completed and their recommendations adopted within specified time scales and, where feasible, within the lifetime of the Plan. This should be on a prioritised basis. This is in the context of future development in the Plan area being informed by these initiatives.

### **Opinion**

The studies and strategies mentioned in the Draft Plan require both internal and external resources in order to be undertaken or completed. At present, there are no guarantees that such resources will be available within specified time scales.

Any recommendations made on the basis of the above-mentioned studies and strategies, when completed, will be taken into account in the assessment of development proposals and will be incorporated into the next iterations of the CDP and local area plans, as appropriate.

### **Recommendation**

No change to the Draft CDP and Environmental Report.

## Specific Comments on the Draft SEA Environmental Report

### **Issue no. 14**

#### **Non-Technical Summary (NTS)**

In the Non-Technical Summary (NTS), there is merit in including a summary of the Strategic Flood Risk Assessment findings. It would also be useful to include **Map 40 Overlay of Environmental Sensitivities** in the NTS. There is also merit in including further information on the proposed monitoring in the NTS, for example a table summarising the selected indicators, targets, monitoring sources and monitoring frequency. This is in the context of highlighting what is required to be implemented over the lifetime of the Plan.

#### **Opinion**

The suggestions are noted and agreed. is already included in the SFRA document. It is not considered useful or necessary to repeat this section in the Non-Technical Summary of the Environmental Report.

#### **Recommendation**

The final version of the **Non-Technical Summary** will include a summary of the SFRA process, **Map 40 (Overlay of Environmental Sensitivities)** and **Table 10.1 (Indicators and targets)** of the ER.

### **Issue no. 15**

#### **Relationship with other plans/programmes**

In **Section 5.4 Relationship with other plans and programmes**, in addition to those listed, the following national plans/policies/programmes may also be relevant to consider:

- National Bioenergy Plan (DCCAE, in preparation).
- Renewable Electricity Policy and Development Framework (DCCAE, in preparation)
- National Mitigation Plan (DCCAE, in preparation).
- National Alternative Fuels Infrastructure for the Transport Sector (DTTAS)
- Food Wise 2025 (DAFM)
- National Peatland Strategy (NPSW)
- Forestry Programme 2014-2020 and National Forestry Policy Review (DAFM, in preparation)

## **Opinion**

Agreed.

## **Recommendation**

In **Section 5.4** of the final **Environmental Report**, insert reference as above, indicating which documents are not yet available.

### **Issue no. 16**

#### **Environmental baseline**

In section **3.3 Population and human health**, the EPA notes that radon levels were not included in the assessment. As outlined in the Agency's Scoping Submission, a significant portion of the Plan area has radon levels greater than 20% above reference level. In light of this, there may be merit in considering including a commitment in the Plan to provide appropriate measures to mitigate for the harmful effects of radon in line with the relevant development management process.

## **Opinion**

The prevention of infiltration of radon gas in new buildings is a matter addressed in the Building Regulations 1997, Technical Guidance Document C (<http://www.housing.gov.ie/sites/default/files/migrated-files/en/Publications/DevelopmentandHousing/BuildingStandards/FileDownload,1642,en.pdf>)

Such construction details do not come within the remit of the development management process.

However, it is acknowledged that the inclusion of a radon map and brief information regarding potential harmful effects of radon may advise prospective applicants for housing developments and the inhabitants of existing dwellings to take measures to prevent such effects in their homes.

## **Recommendation**

In **Chapter 10 Environmental quality** of the final Plan, include a subsection on radon gas together with a map of its levels in Co. Sligo.

The **Environmental Report** shall also be amended to include a similar subsection in **Section 3.3. Population and human health**.

### **Issue no. 17**

#### **Assessment of environmental sensitivities**

Section **8. Evaluation of Plan provisions** describes the assessment and reporting of the likely significant environmental effects of the Plan should include the full range of effects as set out in Annex of the SEA Directive – “secondary, cumulative, synergistic, short, medium and long term, permanent, temporary, positive and negative effects”. In particular, the potential for cumulative effects should be assessed.

## **Opinion**

The SEA has determined the likely significant effects of implementing the Draft Plan. These effects include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects.

In addition, the Appropriate Assessment finds that the Draft Plan has been formulated to ensure that uses, developments and effects arising from permissions based upon this Plan (either individually or in combination with other plans or projects) will not give rise to significant effects on the integrity of any Natura 2000 sites.

### **Recommendation**

No change to the Draft CDP and Environmental Report.

### **Issue no. 18**

#### **Monitoring and reporting**

In **10.2 Indicators and targets**, while reference is made to Table 10.1 showing the indicators and targets selected for monitoring, no such Table is included. It is recommended that this table be included in the final SEA ER and also include, where possible, the relevant information on the monitoring frequency and monitoring sources (EPA, NPSW etc.)

The EPA notes and welcomes the recommendation to focus the monitoring effort for Indicator B2 on macro-corridors and contiguous areas of habitat which have been identified as being important at County level (including rivers, lakes, uplands and peatlands). The commitment in the Plan to continuing the County Habitat Mapping Programme will assist in identifying important habitats and ecological networks.

#### **Opinion**

Table 10.1 has been omitted due to an editing error.

#### **Recommendation**

The **Table 10.1 Indicators and targets** shall be included in the Environmental Report as originally intended.

### **Issue no. 19**

#### **Future amendments to the Draft Plan**

You are reminded that it is a matter for Sligo County Council to determine whether or not the implementation of the proposed Amendments would be likely to have significant effects on the environment. This assessment should take account of the SEA Regulations Schedule 2A Criteria (S.I 436 of 2004) and should be subject to the same method of assessment as undertaken in the “environmental assessment” of the Draft Plan.

#### **Opinion**

Noted and agreed.

#### **Recommendation**

Any proposed amendments shall be assessed in accordance with the SEA Regulations. The assessment will be presented in an Addendum to the initial Environmental Report.

**Issue no. 20****SEA Statement**

Following adoption of the Plan, an SEA Statement, should be prepared and summarise the following:

- How environmental considerations have been integrated into the Plan;
- How the Environmental Report, submissions, observations and consultations have been taken into account during the preparation of the Plan;
- The reasons for choosing the Plan adopted in the light of other reasonable alternatives dealt with;
- The measures decided upon to monitor the significant environmental effects of implementation of the Plan.

A copy of the SEA Statement with the above information should be sent to any environmental authority consulted during the SEA process.

**Opinion**

Noted and agreed.

**Recommendation**

Sligo County Council will comply with the requirements of the Planning Act and SEA Regulations with regard to the SEA Statement and required notifications.

Colm Cummins

Planning & Asset Management, Electricity Supply Board (ESB) Business Service Centre

**Issue no. 1**

The ESB supports the Draft Plan policies regarding energy generation, transmission and distribution, particularly strategic policies SP-EN-1 and SP-EN-7. In relation to telecommunications, the ESB indicates that ESB telecoms mast sites are open for co-location, thus reducing the need for duplication of broadband and mobile telephony infrastructure.

**Opinion**

Noted.

**Recommendation**

No change to the Draft Plan and Environmental Report.

**Issue no. 2**

According to the Third National Energy Efficiency Action Plan (NEEAP), it is estimated that approximately 50,000 electric vehicles will be operated in Ireland by 2020. The ESB, as the single owner/operator of the electricity distribution system, is responsible for providing the EV (electric vehicle) charging infrastructure in Ireland and plans to complete this infrastructure by 2020.

The national target set out in the National Renewable energy Action Plan (2010) is to attain 10% of transport energy from renewable resources by 2020. Current ESB targets are to install 2,000 home charge points, 1,500 public charge points and 90 fast charge points nationwide. In order to assist the ESB in implementing national energy policy, the County Council is asked to add the following requirements to the Draft CDP parking standards:

***1. For Developments with Private Car Spaces (residential and non-residential) including visitor car parking spaces e.g. office –spaces***

- a. At least one parking space should be equipped with one fully functional EV charging point in accordance with IEC 61851 Standard for Electric Vehicle Conductive Charging Systems. This should be capable of supplying 32A 230V single phase AC electricity and be equipped with Mode 3 protection. It should be fitted with a Type 2 socket as defined by IEC 62196.*
- b. It should be possible to expand the charging system at a future date (e.g. by installing appropriate ducting now) so that up to 10% of all spaces can be fitted with a similar charging point.*

***2. For Developments with Publicly Accessible Spaces (e.g. supermarket car park, cinema etc.)***

- a. At least one parking space should be equipped with one fully functional EV charging point in accordance with IEC 61851 Standard for Electric Vehicle Conductive Charging Systems. This should be capable of supplying 32A 230V single phase AC electricity and be equipped with Mode 3 protection. It should be fitted with a Type 2 socket as defined by IEC 62196.*
- b. It should be possible to expand the charging system at a future date (e.g. by installing appropriate ducting now) so that up to 10% of all spaces can be fitted with a similar charging point.*
- c. The Charge Point Parking space(s) should be clearly marked as being designated for EV charging.*

- d. Appropriate signage indicating the presence of a charge point or points should also be erected.*
- e. All charge points fitted in publicly accessible areas should be capable of communicating usage data with the national charge point management system and use the latest version of the Open Charge Point Protocol (OCPP). They should also support a user identification system such as RFID.*

## **Opinion**

Noted and agreed. The promotion of an environmentally-friendly mode of transport, by facilitating the rollout of EV charging infrastructure, is in accordance with the strategic energy and transport policies, as well as the climate adaptation and mitigation policies included in the Draft Plan.

The requirement to equip at least one parking space with an EV charging point is considered reasonable in the case of new developments and extension of existing car parking areas (both public and private).

## **Recommendation**

In **Chapter 13 Development management standards, Section 13.8.5 Car parking requirements, layout and design**, insert the following additional subsection:

### **Electric vehicles (EV)**

To support the use of electric vehicles (EV), in line with Council and national policy, all new developments and extensions to existing car parking areas will be required to provide at least one parking space equipped with a fully functional EV charging point installed in accordance with current ESB specifications.

- Residential developments with communal parking areas should provide minimum one car parking space equipped with an EV charging point, and at least one for every ten residential units.
- Non-residential developments with private car parking spaces (e.g office developments, industrial units) should provide minimum one car parking space equipped with an EV charging point, and at least one for every ten car parking spaces.
- Developments with publicly accessible spaces (e.g. supermarket, cinema, hotel, service station, school, hospital etc.) should provide minimum one car parking space equipped with an EV charging point, and at least one for every ten car parking spaces.

The charging-point parking space(s) should be clearly marked as designated for EV charging. Appropriate signage indicating the presence of a charging point (or points) should also be installed.

All other parking spaces (including residential) should be constructed to be capable of accommodating future charging points as required.

John Conneely (Director), Catherine Kerins (Senior Fisheries Environmental Officer)  
Inland Fisheries Ireland

**Issue no. 1**

**Fisheries resource and development**

Noting the Draft Plan's statement that "the fishing industry in Sligo is less well-developed than in nearby Donegal and Mayo. However, there are some localised areas where fishing is important", IFI provides details regarding fishing and angling areas in County Sligo and the species that populate the County's lakes and rivers.

IFI also indicates that the organisation markets and promotes angling in County Sligo, where it has developed angling infrastructure (e.g. access routes, stiles, bridges, fishing stands for anglers etc.). A National Strategy for Angling Development was recently published by IFI, which also offers a capital grant scheme for fisheries enhancement works to community groups and individuals.

**Opinion**

Noted.

**Recommendation**

No change to the Draft Plan and Environmental Report.

**Issue no. 2**

**Public wastewater treatment**

IFI indicates that policy P-WW-4 is not acceptable. This policy indicates that "in cases where a settlement is not served by a public wastewater treatment plant, or where no spare capacity exist in the relevant wastewater treatment plants, proposals for single houses using on-site wastewater treatment will be considered".

The IFI considers that in areas where treatment facilities do not exist, planning permission should be refused. Where there is no spare capacity, connections to the sewer should not be permitted until upgrading is completed and operational. IFI contends that the requirement for developments to connect to the public wastewater treatment plant when adequate capacity becomes available will be difficult to enforce.

The wastewater treatment plants that represent a major concern for the IFI are those serving Grange and Ballinacfad, which were included in Irish Water's Capital Investment Plan for 2014-2016, together with Tobercurry treatment plant.

Improvements to the sewage network are required in Sligo, Tobercurry and Ballysadare, where overflows from manholes occur as a result of storm water infiltration.

**Opinion**

The wastewater policy **P-WW-4** (p. 158 of the Draft Plan) requires all new developments to connect to the public wastewater treatment plants, where capacity exists.

The policy stipulates that proposals for single houses using on-site wastewater treatment will be considered in settlements without or with insufficient treatment facilities, but only "subject to

appropriate scale, site assessment, design and ground condition, taking groundwater vulnerability into account and subject to compliance with the Habitats Directive”. Such on-site systems cannot be permitted if they pose any risk to the environment, including water courses.

In order to sustain communities in small villages with deficient infrastructure, it is considered reasonable to consider the use of modern, well-functioning on-site treatment systems as an alternative to requiring connection to an already overloaded public wastewater treatment system.

The policy does not allow for multi-unit housing developments to be considered in the absence of adequate capacity in the public wastewater treatment system.

With regard to the treatment plants of concern to the IFI, it is noted that Irish Water has submitted the following update:

- upgrade works at Ballinafad WwTP are progressing to tender stage; the proposed final capacity is 400 PE;
- upgrade works at Grange WwTP are progressing to tender stage; the proposed final capacity is 900 PE;
- upgrade works at Tobercurry WwTP are expected to begin in early 2017; the proposed final capacity is 3,500 PE.

The need for improvements to the sewage network in Sligo, Tobercurry and Ballysadare is noted. Sligo County Council recognises the need for separating the foul and surface water drainage systems, as reflected in the **Surface water drainage policies** (p. 160 of the Draft Plan). Improvements to the existing network are made on an ongoing basis (subject to available resources).

### **Recommendation**

No change to the Draft Plan and Environmental Report.

### **Issue no. 3**

#### **Unsewered areas**

It is suggested that the Plan should recognise the need and support the provision of wastewater treatment facilities to unsewered areas that have experienced considerable development, such as Rathcormac and the Drumaskibbole area. These areas have been identified as not meeting the objectives of the Water Framework Directive as a result of unsewered development.

#### **Opinion**

Policies **P-WW-1** and **P-WW-2** indicate that the Council will co-operate with Irish Water in the provision of adequate wastewater treatment capacity and will require sustainable collection, treatment and discharge of wastewater effluent generated within the County. These provisions are applicable to all areas of the County, including the areas of Rathcormac and Drumaskibbole mentioned by the IFI.

### **Recommendation**

No change to the Draft Plan and Environmental Report.

#### **Issue no. 4**

##### **Private wastewater treatment**

IFI recommends that planning permissions granted for developments with on-site wastewater treatments should be conditioned by the requirement to take out a long-term maintenance contract for the treatment system.

Expressing concerns regarding the long-term management and maintenance of privately operated communal proprietary effluent treatment systems, the IFI acknowledge that this is adequately addressed by policy P-WW-4, which indicates that such communal systems will not be permitted.

##### **Opinion**

Sligo County Council routinely attaches a requirement for long-term maintenance contract as a condition to permissions granted for single houses served by on-site wastewater treatment systems.

##### **Recommendation**

No change to the Draft Plan and Environmental Report.

#### **Issue no. 5**

##### **Road projects**

Noting the national road projects proposed for the N-59, N-16, N-4 and N-15, the IFI indicates that the impacts of poorly designed river/stream-crossing structures can be serious in terms of habitat loss. It is recommended that the Plan should include a policy on the use of clear-span structures where possible on fisheries waters and that IFI should be consulted on any such proposed developments.

IFI also requests to be consulted in relation to road and pipeline projects at the earliest opportunity and throughout the planning and construction stages of such projects. Provision of parking areas for anglers should be considered in future road schemes.

##### **Opinion**

Inland waters objective **O-INW-1** already provides for consultation with prescribed bodies, including the IFI, prior to undertaking, approving or authorising any works or developments that may impact on rivers, streams and water courses. Such works include road and pipeline projects.

It is agreed to include an explicit reference to clear-span river-crossing structures in the case of fisheries.

##### **Recommendation**

The following text shall be added to Inland waters policy **P-INW-1** (p. 110 of the Draft Plan):

- P-INW-1** Protect rivers, streams and other water courses and their associated Core riparian Zones (CRZ) from inappropriate development and maintain them in an open state, capable of providing suitable habitats for fauna and flora. [Structures \(e.g. bridges\) crossing fisheries waters shall be clear-span and shall be designed and built in consultation with Inland Fisheries Ireland.](#)

## **Issue no. 6**

### **Forestry**

IFI has concerns regarding the impact of forestry on sensitive fishery catchments, and also regarding aerial fertilisation. It is requested that such operations be discouraged in the development plan.

### **Opinion**

The granting of licenses for forestry operations is a function of the Forest Service (Department of Agriculture, Food and the Marine). The Council has only an advisory role in such matters, similar to IFI.

### **Recommendation**

No change to the Draft Plan and Environmental Report.

## **Issue no. 7**

### **Zoning**

IFI supports the statement in **Section 10.1.3 River water quality** indicating that Sligo County Council will strictly control development and activities in the catchments of rivers in order to protect their waters from pollution. IFI encloses a guidance document regarding riparian zones, entitled Planning for watercourses in urban environments.

### **Opinion**

The support and the guidance document are noted.

### **Recommendation**

No change to the Draft Plan and Environmental Report.

## **Issue no. 8**

### **Flood alleviation**

IFI welcomes the Inland waters policy **P-INW-3** – “*ensure that all proposed greenfield residential and commercial development use sustainable drainage systems (SUDS) in accordance with best current practice, ensuring protection of the integrity of wetland sites in the adjoining area, including their hydrological regime*”.

Sligo County Council should develop a policy in relation to Drainage District operations. All flood alleviation works must be carried out in consultation with the IFI. There must be no development in areas liable to flooding. Land zoning should take account of this. Any conflict between flood risk and land zoning must be taken into account – relevant lands should be rezoned for appropriate use, such as open space.

### **Opinion**

Noted. Any works, including flood alleviation works, with the potential to affect fisheries will be authorised only after consultation with IFI, as required by Inland waters objective **O-INW-1**.

The **Flood risk management policies** contained in **Chapter 10 Environmental Quality** (p. 185 of the Draft Plan) are designed to ensure that lands at risk from flooding are zoned appropriately.

### **Recommendation**

No change to the Draft Plan and Environmental Report.

### **Issue no. 9**

#### **Riparian and aquatic habitat**

Riparian zones must be protected and managed in a manner that will reduce the impact of development on habitats. IFI should be consulted in relation to any development that could potentially impact on the aquatic ecosystems and associated riparian habitat.

#### **Opinion**

Noted. Inland waters objective **O-INW-1** already provides for consultation with prescribed bodies, including the IFI, prior to undertaking, approving or authorising any works or developments that may impact on rivers, streams and water courses.

#### **Recommendation**

No change to the Draft Plan and Environmental Report.

### **Issue no. 10**

#### **Water abstraction**

IFI is concerned in relation to unregulated water abstraction, a practice with potentially significant ecological impacts on small nursery or spawning streams, and which can also contribute to the spread of invasive species. It is imperative that Sligo County Council maintains an abstraction register.

IFI also requests that investment be made in the IW supply network to minimise leaks from the system and reduce the abstraction pressure on lakes such as Lough Gill and Lough Talt.

#### **Opinion**

Noted and agreed. Sligo County Council has commenced the process of establishing a water abstraction register.

Investment by Irish Water in the supply network is strongly supported by the Council, which intends to co-operate with IW to ensure an adequate, sustainable and economic supply of good quality water, as stated in **Water supply policy P-WS-1** (p. 150 of the Draft Plan).

#### **Recommendation**

No change to the Draft Plan and Environmental Report.

## **Issue no. 11**

### **Invasive species**

IFI lists the negative impacts of invasive species on native species and indicates that an invasive species policy should require the use of native species in landscape design proposals. The Plan should include policies to ensure that developments do not lead to the spread of invasive species.

### **Opinion**

Noted. It is considered that Invasive species policies **P-INV-1** and **P-INV-2** are sufficiently clear in their purpose of preventing and controlling the spread of invasive species.

In **Chapter 13 Development management standards** (Section 13.2 General development standards), **Subsection 13.2.6 Landscaping** requests developers to give preference to native species and, where appropriate, provide proposals for the management and eradication of invasive species.

**Subsection 13.4.5 Site landscaping** (Section 13.4 Residential development in rural areas) states explicitly that “new planting should consist of native species”.

Landscaping conditions attached to grants of planning permission routinely require the use of native, local species.

Additional policies in **Section 7.1.5 Trees, woodlands and hedgerows**, requiring the planting of native species, are proposed by the Chief Executive in response to Issue no. 7 of Submission no. 42 (An Taisce).

These above provisions are considered sufficient.

### **Recommendation**

No further change to the Draft Plan and Environmental Report.

## **Issue no. 12**

### **Renewable energy**

With regard to Section 11.1.2 Wind energy, IFI supports the comments on the importance of harnessing wind resources in an environmentally sustainable manner. IFI requests to be consulted at an early stage on schemes that might impact on water courses. The same request is made in relation to hydro-electric schemes.

### **Opinion**

Noted. Inland waters objective **O-INW-1** already provides for consultation with prescribed bodies, including the IFI, prior to undertaking, approving or authorising any works or developments that may impact on rivers, streams and water courses.

### **Recommendation**

No change to the Draft Plan and Environmental Report.

## Submission no. 92

30 November 2016

Suzanne Dempsey, Spatial Planning Strategy Specialist  
Irish Water

### Issue no. 1

Having reviewed the Draft CDP 2017-2023, S. Dempsey notes that “the settlement strategy in the Draft Plan is in line with the settlement hierarchy as per the Regional Planning Guidelines” and that provision is made for the accommodation of an additional population of 5,500 over the life of the Plan.

In relation to wastewater services, IW advises that:

- there is sufficient capacity to meet the population target for Sligo & Environs and Enniscrone, as outlined in the Core Strategy Tables A and B;
- there is sufficient capacity to meet the population target in Ballymote and Tobercurry “excluding the 50% overzoning” as outlined in the Core Strategy Table B.

In relation to waster supply, IW advises that:

- there is sufficient water to meet the population target for Sligo and Environs, as outlined in the Core Strategy Table A;
- the resolution of issues relating to drinking water quality in the Lough Talt Regional Water Supply is ongoing.

### Opinion

Noted. No comment deemed necessary.

### Recommendation

No change to the Draft Plan and Environmental Report.

### Issue no. 2

The submission provides updated information regarding the progress of projects for upgrading several wastewater treatment plants in the county.

### Opinion

These updates are noted and should be reflected in the Draft Plan.

### Recommendation

The text of **Table 9.C Wastewater treatment plants in County Sligo** (p. 151-157 of the Draft CDP) should be modified as follows (additions in **blue**, deletions in **red**):

#### Ballinacarrow

~~Irish Water Capital Investment Plan 2014—2016 (CIP) includes a proposal to upgrade the plant to a fully operating 250 PE capacity. IW considering upgrading the plant to 400 PE.~~

Upgrade works at the Ballinacarrow WWTP are progressing to tender stage (November 2016) and it is proposed to provide a 450 p.e. plant.

## **Ballinafad**

~~Irish Water Capital Investment Plan 2014–2016 (CIP) includes a proposal to upgrade the plant to 200 PE capacity. This scheme has been bundled with the Tobercurry, Grange and Strandhill WWTPs (works are expected to commence in 2017).~~

Upgrade works at the Ballinafad WWTP are progressing to tender stage (November 2016) and it is proposed to provide a 400 p.e. plant.

## **Grange**

~~IW's CIP 2014–2016 includes a proposal to upgrade the plant to 900 PE. This scheme has been bundled with the Tobercurry, Strandhill and Ballinafad WWTPs. Works are expected to commence in late Q4 2016 or early Q1 2017.~~

Upgrade works at the Grange WWTP are progressing to tender stage (November 2016) and will provide a 900 p.e. plant.

## **Mullaghmore**

~~No works are proposed by IW in relation to this scheme.~~

Upgrade of the Mullaghmore WWTP is included in Irish Water's Investment plan 2017-2021 and the final design capacity is being investigated by Irish Water.

## **Rosses Point**

~~IW is currently reviewing the Rosses Point WWTP scheme and is considering 2 options:~~

~~–on site treatment at the existing WWTP, or  
–converting the WWTP into a pumping station and pumping effluent to the Teesan/Lisnalurg pumping station.~~

~~Neither option allows for connections to proposed mains (e.g. at Ballincar)~~

Sligo County Council, in conjunction with Irish Water, is considering the options available for the provision of wastewater services for the areas of Rosses Point and Cregg / Ballincar.

## **Tobercurry**

~~IW's CIP 2014–2016 includes a proposal to upgrade the plant to 3,500 PE. This scheme has been bundled with the Grange, Strandhill and Ballinafad WWTP. Works are expected to commence in late Q4 2016 or early Q1 2017.~~

Upgrade works at the Tobercurry WWTP to provide a 3,500 p.e. plant are expected to begin in early 2017.

## **Strandhill**

~~IW's CIP 2014–2016 includes a proposal to upgrade the plant to 3,700 PE. This scheme has been bundled with the Tobercurry, Grange and Ballinafad WWTPs. Works are expected to commence in late 2016 or early 2017.~~

Upgrade works at the Strandhill WWTP are progressing to tender stage (November 2016) and it is proposed to provide a 3,700 p.e. plant.

'Dette Cunningham, Senior Executive Planner  
Forward Planning Section, Mayo County Council

**Issue no. 1**

The submission refers to the cycling and walking objective O-CW-5 (p. 139 of the Draft Plan), which reads as follows:

***O-CW-5** Seek the development of a footway and cycleway (greenway) on or alongside the disused railway line from Claremorris to Collooney insofar as such route does not compromise the reopening of the Western Rail Corridor, if reopening the railway line is deemed feasible.*

In relation to the above, D. Cunningham indicates that the greenway network proposed in County Mayo does not include any section of the Western Rail Corridor between Charlestown and Claremorris/Ballindine.

**Opinion**

The observation is noted and agreed. The reference to Claremorris in objective O-CW-5 should be removed.

**Recommendation**

In **Chapter 8 Transport and mobility, Section 8.3 Cycle and pedestrian movements**, modify objective **O-CW-5** (p. 139 of the Draft Plan) as follows (additions in **blue**, deletions in **red**):

**O-CW-5** Seek the development of a footway and cycleway (greenway) on or alongside the ~~disused~~ **closed** railway line from ~~Claremorris to~~ **Collooney to Bellaghy (Sligo/Mayo county boundary)** insofar as such route does not compromise the reopening of the Western Rail Corridor, if reopening the railway line is deemed feasible'.

**Issue no. 2**

The submission indicates that Mayo County Council intends to develop a VeloRail tourism facility on 12 km of the Western Rail Corridor, in the vicinity of Kiltimagh. This project will require the utilisation of the existing rail infrastructure and will not involve the removal of rails or sleepers.

It is stated that objective O-CW-5 contained in Chapter 8 of the Draft CDP conflicts with Mayo County Council's policy regarding the use of the railway tracks on the Western Rail Corridor for tourism purposes as an interim measure for the rail line pending its reopening for passenger and rail freight.

**Opinion**

Objective O-CW-5 has been formulated in a manner that allows the undertaking of a feasibility study regarding a range of options for the future development of the Western Rail Corridor, such as "footway", "cycleway", "on the railway line", "alongside the railway line".

The objective clearly specifies that such future development shall not compromise the reopening of the WRC, if reopening is deemed feasible. There is no immediate or direct conflict between objective O-

CW-5 and Mayo County Council’s policy regarding the use of the railway track for tourism purposes. In fact, Mayo County Council’s 12-km VeloRail project could set a positive example and offer an additional option to be considered by Sligo County Council.



**Velo-rails are a popular attraction in mainland Europe**

(source: <http://www.advertiser.ie/mayo/article/75789/velorail-could-bring-major-tourism-boost-to-kiltimagh>)

However, for the time being, it is considered that the wording of objective O-CW-5 should be retained until a final decision is made by the elected members of Sligo County Council, after careful examination of all the options.

**Recommendation**

No change to the Draft Plan and Environmental Report.

## Section II.

# Submissions from individuals, community organisations and private companies

### Submission no. 1

21 September 2016

Francis Davitt  
Davitt Plan & Design

### Issue no. 1

F. Davitt contends that a paragraph in subsection 13.4.3 of the Draft Plan is “anti-competitive and unconstitutional”, and that the Local Authority is attempting to “restrict the submission of planning applications to Registered Architects”. This, according to Mr Davitt, is a “fundamentally flawed perspective”.

### Opinion

Section 13.4.3 provides general guidance on rural house design, in an effort to improve the standard of rural houses and their impact on the visual amenity of the countryside. The Planning Authority recommends the use of a registered architect to design houses, since these professionals are trained specifically to produce design solutions that address both clients’ needs, landscape and heritage context, environmental considerations and aesthetic criteria.

### **This is only a recommendation, NOT a requirement.**

Currently, the overwhelming majority of planning applications received by Sligo County Council are prepared by engineers and technicians. Registered architects represent a very small minority among the planning agents who submit applications.

However, the very few development proposals which are designed by architects are always of a very high standard, usually leading to a grant of planning permission without delays (e.g. requests for further information involving design changes).

Applicants are entitled to employ whomever they choose to design their house. It is also important to note that there is no legislation requiring the preparation of planning applications by architects.

Refer also to the Chief Executive’s response to Submissions no. 4, 59 and 60.

### Recommendation

No change to the Draft Plan and Environmental Report.

**Submission no. 3**

3 October 2016

Pat Benson

on behalf of Carraroe and District Regeneration Association

**Issue no. 1**

This submission expresses concern about the “almost total absence or recognition of the existence of Carraroe in the Draft Plan”. In particular, it queries the lack of a mini-plan for Carrowroe. It also refers to certain heritage items and features located in the Carrowroe area, to the lack of proposals for Cairns Hill, the lack of proposals for footpaths and urban design improvements for the village etc.

**Opinion**

Carrowroe and the surrounding areas to the south of Sligo, to Drumsakibbole and Aghamore, are covered by the Sligo and Environs Development Plan 2010, now incorporated in the County Development Plan. Mini-plans are prepared for villages outside the Sligo and Environs area.

Proposals for the village of Carrowroe will be included in the forthcoming local area plan for Sligo and Environs, which will be the successor of the Sligo and Environs Development Plan.

**Recommendation**

No change to the Draft Plan and Environmental Report.

**Submission no. 4**

6 October 2016

Damien Owens

on behalf of Engineers Ireland

**Issue no. 1**

This submission notes section 13.4.3 of the Draft Plan and in particular the following statement:

*“The Planning Authority strongly recommends employing a registered architect when planning to build a rural house, especially when modern design is envisaged. A registered architect is an architect with a relevant qualification in certain approved universities and institutes, who is listed on the Royal Institute of Architects Ireland (RIAI) Register of Architects.”*

D. Owens indicates that, apart from the RIAI, there are two other organisations representing design professionals that can act as Assigned Certifier and Design Certifier under Statutory Instrument . No. 9 (Building Control (Amendment) Regulations 2014. These organisations are Engineers Ireland (EI) and the Society of Chartered Surveyors of Ireland. (SCSI).

It is proposed to include a reference to all three organisations in the relevant sections of the Development Plan.

**Opinion**

Section 13.4.3 provides general guidance on rural house design in an effort to improve the standard of rural houses and their impact on the visual amenity of the countryside. The Planning Authority recommends the use of a registered architect to design houses since these professionals are specifically trained for such purposes.

The issue of certification under the Building Regulations is not a matter for the development plan and is not mentioned in any section of the Draft CDP. References to design certification, EI and SCSI are not relevant in the context of rural house design guidance.

Refer also to the Chief Executive's opinion on Submission no. 1.

### **Recommendation**

No change to the Draft Plan and Environmental Report.

### **Submission no. 6**

13 October to 17 November 2016

Grace Larkin, Tamlyn McHugh, Tamlyn McHugh (Chairperson of Friends of Sligo Gaol), Janet Benson, Steve Devine, Anna Marie Doherty, Dr. Robert Hensey, Iarlaithe O Tighearnaigh, Nuala Dineen-Campbell, John Dorrian, Pauline Foley, Deirdre Melvin, Niall O'Connor, Eddie O'Gorman, Fintan Whelan, Michael Devine, Deirdre Molloy, Clare Feerick, Frank Reilly

### **Issue no. 1**

Eighteen identical letters were received from the persons named above. Therefore, the letter is treated as a single submission with eighteen signatories.

The submission requests that Sligo Gaol "be included" in the Draft CDP. It indicates that "*Sligo Gaol has huge potential to be a major tourist attraction for the city of Sligo and with right funding, vision and drive can be conserved and restored to equal the amazing tourist destinations such as Kilmainham and Wicklow Gaols*".

### **Opinion**

The Draft Plan already includes reference to Sligo Gaol in **Section 4.4.5 - Cultural tourism**. The development of Sligo Gaol as a tourist attraction is listed as an opportunity for cultural tourism in County Sligo. No further discussion of the Gaol is necessary in the Draft CDP.

### **Recommendation**

No change to the Draft Plan and Environmental Report.

### **Submissions no. 7, 8, 16, 24, 26, 51**

John McCarrick, Pat McCarrick (Chairperson of Sligo Greenway Co-op), Brendan Quinn (two separate submissions on the same topic), John Mulligan, Jarlath Gantly

**Note:** These submissions, which relate to the Collooney-Bellaghy railway line, were received between 19 October and 30 November 2016

### **Issue no. 1**

The submissions request that certain wording in Objective O-CW-5 be changed from

*"Seek the development of a footway and cycleway (greenway) on or alongside the disused railway line ... "* to

*"Seek the development of a footway and cycleway (greenway) **on the closed** railway line ... "*

It is indicated that the change from ‘disused’ to ‘closed’ reflects the actual status of the route as defined by Irish Rail.

The proposed change from ‘on or alongside’ to ‘on’ is necessary in order to ensure that the cost of providing a greenway is reduced.

### **Opinion**

It is considered that changing the wording of objective O-CW-5 from ‘on or alongside’ to ‘on’ would limit the range of options for the provision of the greenway.

There is no objection to use the wording “closed railway line” instead of “disused railway line”.

### **Recommendation**

In **Chapter 8 Transport and mobility, Section 8.3 Cycle and pedestrian movements**, modify the wording of **Objective O-CW-5** (p. 139 of the Draft Plan) by replacing “~~disused~~ railway line” with “closed railway line”.

### **Submission no. 9 + 10**

19 October 2016

Pat Mc Carrick, Ballymote and Cloonacool

### **Issue no. 1**

These submissions welcome the inclusion of objective O-CW-5 in Section 8.3 of the Draft CDP.

### **Opinion**

This support for Objective O-CW-5 is noted. Please refer also to the Chief Executive’s recommendation regarding Submissions no. 7, 8 etc.

### **Recommendation**

No change to the Draft Plan and Environmental Report.

### **Submission no. 11**

25 October 2016

Joe Corcoran on behalf of Sligo Tourism

### **Issue no. 1**

This submission on behalf of Sligo Tourism requests that the Draft CDP reflects “*the growing need for protected walks and cycle paths for family use and in particular the possible development of Greenways*”.

### **Opinion**

**Section 4.4 Tourism development** of the Draft County Development Plan deals with the development of tourism in County Sligo, including sub-sections on the Wild Atlantic Way, rural and cultural tourism. Relevant tourism provisions are P-TOU-4 to P-TOU-8, as well as objective O-WAW-1.

**Section 6.7.4 Outdoor recreational amenities** contains a subsection on Greenways and three relevant outdoor recreation policies: P-OR-19, P-OR-20 and P-OR-21. The development of Greenways is again discussed in **Section 8.3 Cycle and pedestrian movements** and addressed as part of policies P-CW-8 & 9 and O-CW-1, 2, 5, 6.

It is considered that the Draft CDP responds adequately to the need for protected walks and cycle paths.

### **Recommendation**

No change to the Draft Plan and Environmental Report.

### **Submission no. 27**

28 November 2016

Ann Mulcrone, Reid Associates  
on behalf of the Daughters of Wisdom (Cregg)

### **Issue no. 1**

This submission requests that healthcare facilities policy P-HC-5 in the Draft Plan become an objective of the draft plan rather than a policy (it is currently O-CF-1 in the CDP 2011-2017) and be amended to include the following text shown in green type below:

*“Facilitate the planned redevelopment of the existing Wisdom Services Care Facility at Cregg, to provide an integrated residential and educational community to include a range of facilities for those with and without intellectual disabilities and special needs, within a village campus setting within the overall lands at Cregg, subject to the availability of adequate waste water treatment infrastructure”.*

### **Opinion**

The entirety of the lands at Cregg comprise a total of 24 hectares.

Policy P-HC-5 of the Draft CDP reads as follows:

*Facilitate the phased redevelopment of the existing Wisdom services care facility at Cregg, subject to the availability of adequate wastewater treatment infrastructure and subject to compliance with the requirements of the Habitats Directive.*

Objectives of a development plan generally relate to projects or works which are planned by the Local Authority or other body. The policy P-HC-5 included in the Draft Plan does not relate to any specific works or projects. It merely states that the local authority will facilitate the phased redevelopment of the existing Wisdom Services Care Facility at Cregg. It is considered that P-HC-5 should remain a policy and not an objective as requested.

The text proposed for inclusion relates to “the overall lands at Cregg”, which include not just the existing facility (11.14 ha) but potentially also 14.25 ha of greenfield lands giving a total of 25.4 hectares. While these areas are not mentioned in the submission, the extent of the lands can be easily seen on the website of the Property Registration Authority (see map below).

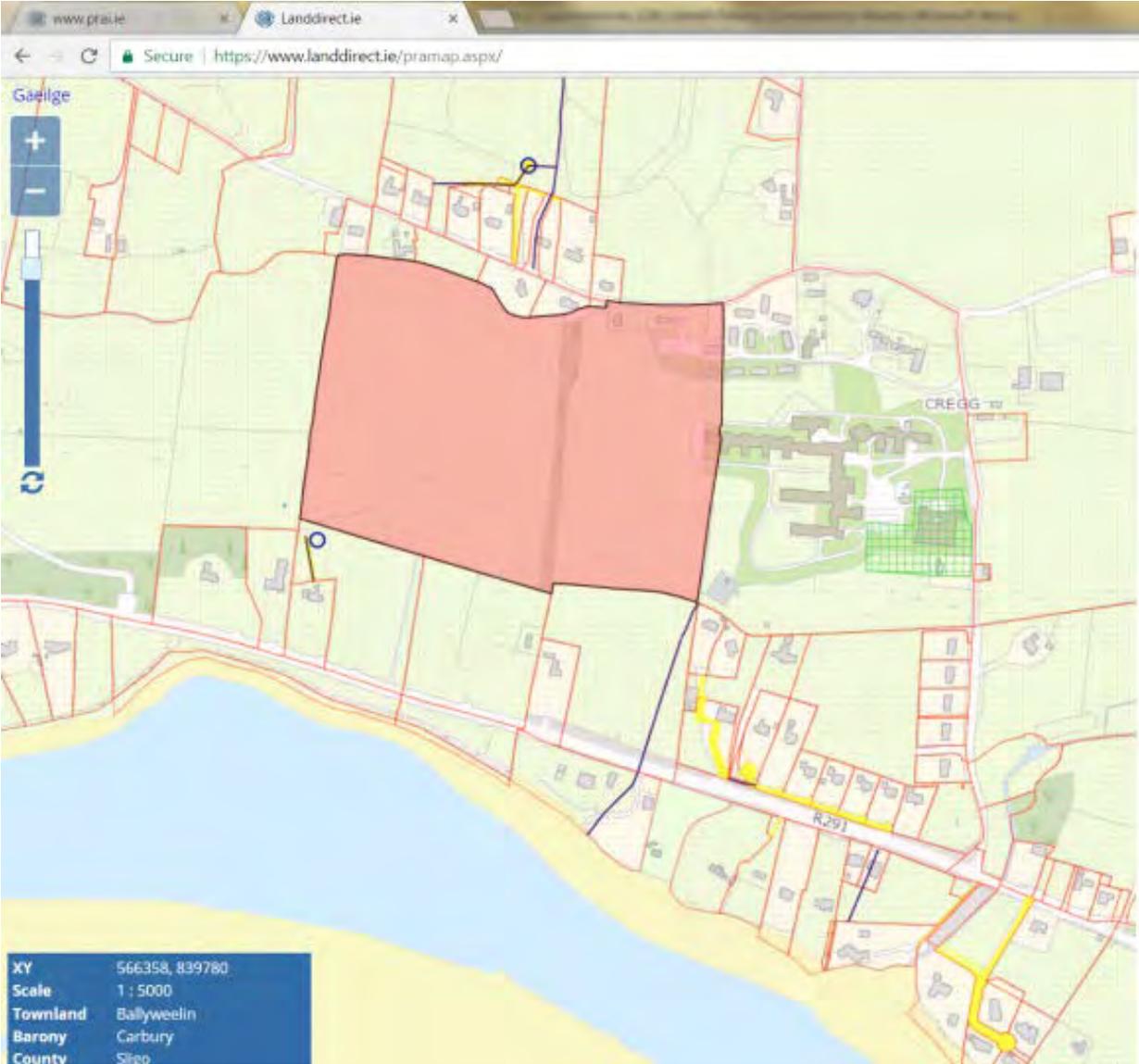
The lands at Cregg are not zoned for development, are located within a *rural area under urban* influence and are outside the development limits of both Ballincar and Rossess Point.

The redevelopment of the existing facility at Cregg is considered reasonable and necessary to ensure services are maintained to the required standard. However, any potential expansion into the overall lands available in the rural area under urban influence, to provide accommodation and other facilities for people with and without disabilities, would be in direct contravention of the Settlement Hierarchy set out in the Core Strategy of the Draft Plan.

The Core Strategy clearly indicates that population growth and associated housing development must be directed into settlements, based on their role and position in the spatial hierarchy. These settlements are listed in Section 3.2 and mapped in Fig. 3.A – core Strategy Map.

Furthermore, policy P-HC-2 promotes the provision of healthcare services and facilities within existing settlements, on sites convenient to pedestrian access and public transport. An expansion of the facility at Cregg in the form of a ‘village campus’, as suggested in the submission, would be in conflict with this policy.

*The map below is a screenshot taken from [www.landdirect.ie](http://www.landdirect.ie) which shows the possible extent of land ownership at Cregg*



**Recommendation**

No change to the Draft Plan and Environmental Report.

## Submission no. 29

28 November 2016

John Giblin

### Issue no. 1

This submission recommends that a ‘*very clear energy policy for all buildings – private and public*’ be included in the Draft Plan, which should make it mandatory for all buildings, public or private, to adopt the Passive House (PH) standard.

### Opinion

Section 11.1 **Energy** sets out the EU and national policy context regarding the transition to clean energy and includes relevant strategic policies and energy efficiency policies.

In **Chapter 13 Development Management standards, Section 13.2.18** deals with energy efficiency. The section sets out guidelines for the sustainable design, siting and construction of buildings, including dwellings.

It is not within the remit of a development plan to impose mandatory standards in construction. This is a matter for the Building Regulations.

### Recommendation

No change to the Draft Plan and Environmental Report.

## Submission no. 35

28 November 2016

Ronan and Maureen McCann

### Issue no. 1

Ronan and Maureen McCann suggest amendments to the rural housing policy which would enable them to qualify with the policy and move from their existing house in Grange village to a site in the Rural Area Under Urban Influence in North Sligo. They specifically suggest the following in relation to the “5 km clause”:

- to be increased to 8 or 10 km, or
- to be replaced with “on a site within a reasonable distance of the original family home”, or
- to be replaced with “within the same parish as the original family home”, or
- to be replaced with “within the rural area surrounding the original family home”, or
- to be replaced with “a radius of 5 km from the original family residence”, and where the area is close to the coast, county boundaries or development limits, the 6 km radius to be extended “to include an area equivalent to the area lost”.

It is also requested that the wording “natural resource based employment” be changed to “rural based employment”

### Opinion

In advance of an announced modification of the *Sustainable Rural Housing Guidelines* (DoEHLG, 2005), it is proposed to amend the rural housing policy in Rural Areas under Urban Influence in a

manner that would make it compatible with Article 43 (freedom of movement of people) and Article 56 (freedom of movement of capital) of the EC Treaty.

All temporal and spatial restrictions, such as the “5 km clause”, are to be omitted from the policy. Please refer to the Chief Executive’s Supplementary Recommendation regarding changes to the Rural Housing Policies.

### **Recommendation**

No change to the Draft Plan and Environmental Report on foot of this submission.

### **Submission no. 36**

28 November 2016

Gail McGibbon, CEO  
on behalf of Sligo Business Improvement District

### **Issue no. 1**

The submission makes general comments and recommendations about tourism in Sligo town and county from the perspective of the Sligo Business Innovation District group. It highlights certain provisions of the Local Economic and Community Plan 2016 (LECP), as presented in the Draft CDP, and suggests changes to various LECP objectives.

G. McGibbon also refers to the need for coach parking in Sligo town and indicates that five retail planning policies are “of particular interest and focus to Sligo BID”.

### **Opinion**

The comments are noted. The LECP cannot be amended through the development plan review process. Issues relating to parking in Sligo town will be addressed as part of the preparation of a local area plan for Sligo and Environs.

### **Recommendation**

No change to the Draft Plan and Environmental Report.

## **Submission no. 39**

28 November 2016

Martin Timoney

**Note:** Parts of this submission are addressed in **Volume 2** (Submissions relating to Mini-Plans) and **Volume 3** (Submissions related to the Record of Protected Structures) of this Report

### **Issue no. 1**

Martin Timoney queries the requirement that new houses should be ‘in keeping’ with their neighbours implying that there can be no new styles of houses. He makes general comments relating to house design and colour.

#### **Opinion**

The guidance for residential development in rural areas contained in Section 13.4 of the Draft Plan does not require new houses to be ‘in keeping’ with their neighbours. New development is encouraged to be *‘integrated successfully in to the rural setting, i.e. development should harmonise or ‘read’ with the existing traditional patterns of development’*.

The use of colour is not discussed in the Draft CDP, nor is it considered appropriate or necessary to do so.

#### **Recommendation**

No change to the Draft Plan and Environmental Report.

### **Issue no. 2**

Concern is expressed regarding the “blinding” effect of external lighting of houses and farm buildings on night time traffic.

#### **Opinion**

Noted and agreed. Refer to the Chief Executive’s recommendation on Submission no. 42, Issue no. 16.

#### **Recommendation**

No further change to the Draft Plan and Environmental Report on foot of this issue.

### **Issue no. 3**

This submission makes some general comments about the reasons for including buildings on the Record of Protected Structures. The submission suggests that in some cases including a building on the RPS can be counter-productive. If it costs too much to ensure the structure’s continued use, it may be left vacant. Ground-floor uses perceived as “bad” (e.g. chipper) can sometimes provide the finance to maintain the overall structure.

#### **Opinion**

The Council recognises the financial challenge involved in retaining the special character and interest of a historic building on the one hand, while allowing the building to adapt to changing uses.

The decision to include the majority of structures on the RPS for the County was based on the recommendation of the Minister for Environment, Heritage and Local Government in a survey of the architectural heritage of County Sligo completed in 2006 known as the National Inventory of Architectural Heritage (NIAH).

Building Conservation Grants are available to owners of protected structures and properties within Architectural Conservation Areas for conservation works. Grants are available from the Local Authority, as well as from bodies such as the Heritage Council and the Irish Georgian Society.

In Section 7.3 Architectural heritage, Section 7.3.5 Enabling development (p. 121 of the Draft Plan) indicates that “development that would be unacceptable in planning terms (e.g. inconsistent with zoning objectives for an area) but for the fact that it would bring significant public benefits in the form of securing the long-term future of a protected structure” would be considered in certain circumstances. Policy P-ARH-4 complements this provision.

**Recommendation**

No change to the Draft Plan and Environmental Report.

**Issue no. 4**

This submission refers to the erection of plaques on buildings. Such plaques should not be an imposition on the occupants of the house.

**Opinion**

Noted. This is an operational matter, outside the remit of a County Development Plan.

**Recommendation**

No change to the Draft Plan and Environmental Report.

**Issue no. 5**

M. Timoney advises the Planning Section to refer to the [www.archaeology.ie](http://www.archaeology.ie) website to avail of updates to the Record of Monuments and Places and for pre-planning meetings.

**Opinion**

This is an operational matter, outside the remit of a County Development Plan.

**Recommendation**

No change to the Draft Plan and Environmental Report.

**Issue no. 6**

Reference is made to “deserted medieval villages, which are considered failed settlements. Using Toberbride as an example, M. Timoney contends that “the Draft CDP could lead to DMVs of 21<sup>st</sup> Century”.

**Opinion**

The point and meaning of these statements is unclear. No comment can be made.

**Recommendation**

No change to the Draft Plan and Environmental Report.

**Issue no. 7**

On page 99 of Volume 1 of the Draft CDP, it is stated that 48 of the 64 burial grounds in the county are National Monuments. This is incorrect. It should be noted that 48 of the 64 burial grounds are included in the Register of Monuments and Places. Furthermore, it is noted that no reference is made to features which require ‘minding’ within these graveyards.

**Opinion**

The provisions of Section 14 of the National Monuments (Amendment) Act 2004 accord National Monument protection to archaeological sites that are within the ownership or guardianship of a local authority.

A determination in relation to whether National Monument status applies to a local authority-owned graveyard can be sought by a local authority from the Minister of DAHRRGA through the National Monuments Service or through an application for consent under Section 14 of the National Monuments Act 1930 (as amended).

As indicated in **Section 7.2 Architectural heritage** of the Draft CDP, and specifically in policy **P-AH-5**, it is Council policy to protect historical burial grounds in accordance with best conservation principles.

**Recommendation**

No change to the Draft Plan and Environmental Report.

**Issue no. 8**

M. Timoney recommends that Sligo County Council should employ a County Archaeologist and should “progress immediately with the construction of a County Museum with attached County Local Studies Archive”. An in-house Conservation Architect “is also paramount”.

**Opinion**

These are operational matters outside the remit of the County Development Plan.

**Recommendation**

No change to the Draft Plan and Environmental Report.

**Submission no. 41**

29 November 2016

John Tierney, Associate Director, John Spain Associates  
on behalf of Aldi Stores (Ireland) Ltd

**Issue no. 1**

The submission “*supports the draft Sligo County Development Plan and accompanying Retail Strategy which recognises, supports and protects the role, function and contribution of neighbourhood centre facilities throughout the County as part of a sustainable retail hierarchy*”.

**Opinion**

The support is noted.

**Recommendation**

No change to the Draft Plan and Environmental Report.

**Issue no. 2**

J. Tierney provides background information on Aldi, a company that operates over 5,000 stores in Europe, the USA and Australia, with over 100 stores in Ireland. He indicates Aldi’s objective to develop further stores within the Sligo area. Aldi has a long-standing objective to develop a small supermarket on lands zoned for neighbourhood centre purposes at Cornageeha, on a site adjoining Pearse Road.

The submission requests that an objective is included in the Development Plan to provide “*an additional discount foodstore/small supermarket to serve the southern environs of the City*”.

**Opinion**

The zoning and specific objectives set out in the Sligo and Environs Development Plan 2010 will be reviewed and possibly modified as part of the preparation of the Sligo and Environs Local Area Plan. The CDP 2017-2023 should not pre-empt the outcome of this review by including specific objectives for retail development in Sligo City.

**Recommendation**

No change to the Draft Plan and Environmental Report.

**Submission no. 43**

29 November 2016

Tony Bamford  
TBP Planning and Development Consultants

**Issue no. 1**

TBP indicates that the purpose of this submission is “*to seek adjustments to the wording of the Development Plan and Draft Retail Strategy to avoid a position where retail development proposed in the City is not considered premature pending the preparation of a Local Area Plan for the City, and a*”

*Retail Strategy for the same area*". This is the background against which specific text changes are sought.

### **Opinion**

Noted.

### **Recommendation**

No change to the Draft Plan and Environmental Report.

### **Issue no. 2**

TBP conducted a review of planning documentation associated with three planning applications in Sligo City Centre dating from 2006 (Dunnes Stores, Tesco and Callside) and concluded that the only additional convenience floor space proposed relates to the extant Dunnes Stores application (06/70009), i.e. only 2,200 sq.m. It is suggested that this may impact on the figure for extant convenience permissions given in Section 4.5.2 of the Draft Plan.

### **Opinion**

Noted. While TBP reviewed planning files associated with Sligo City Centre, the figure in **Section 4.5.2 Projected retail floor space requirements** (p. 56 of the Draft Plan), i.e. 5,600 sq.m. relates to the entire county.

### **Recommendation**

No change to the Draft Plan and Environmental Report.

### **Issue no. 3**

TBP suggests the following addition (text shown in *green*) to **Section 4.5.3 Location of future development** (p. 57 of the Draft CDP):

#### *Tier 1 – Primary Retail Centre – Sligo City*

*While the convenience shopping function of Sligo City Centre is important to its ongoing vitality, it must be ensured that convenience retail facilities are easily accessible across the city as a whole. Details regarding the location and scale of retail development in the city will be addressed in the future Sligo City Retail Strategy (to be prepared in conjunction with the Sligo and Environs Local Area Plan).*

*Over the period of the Plan it is anticipated that the majority of demand for comparison retail growth will be centred upon Sligo City (Tier 1) and the Council should continue to focus comparison retailing into the city centre.*

*“The city’s convenience offer must also be accessible to its rural catchment and enhanced provision made to the west of the N4 where it intersects with the city. The planned city centre expansion area (C2), as set out in the Current City and Environs Development Plan, remains an objective for the City and the Council will continue to actively pursue new development, including retail development, on designated Urban Regeneration sites as listed in the current Development Plan”.*

### **Opinion**

The suggestion is noted. However, the zoning and urban regeneration objectives set out in the Sligo and Environs Development Plan 2010 will be reviewed and possibly modified as part of the

preparation of the Sligo and Environs Local Area Plan. The CDP 2017-2023 should not pre-empt the outcome of this review through statements referring to future zoning and objectives in the Sligo and Environs area.

**Recommendation**

No change to the Draft Plan and Environmental Report.

**Issue no. 4**

TBP suggests the following additional wording to **Section 4.5.4 Sligo City – Primary Retail Centre** (p. 58-59 of the Draft Plan):

*““In Sligo City, there will be an additional requirement for an estimated 1,251 sq.m net convenience floor space by the end of 2023. This additional floor space may entail expansion of an existing retail operation or a new retail unit, such as a supermarket. However, given the average floor plates of new supermarket facilities (generally above 1,000–1,300 sq.m. net), potential for extending above the estimated requirements noted above should be allowed for in such instances. **However, to ensure the Planning Authority remains responsive to the retail market, proposals for new convenience and comparison retail will be considered having regard to the current City and Environs Development Plan and the Retail Planning Guidelines. New proposals will be required to prepare Retail Impact and Capacity Assessments and depending on their location prepare a sequential assessment to justify the proposed development”**”.*

**Opinion**

It is considered unnecessary to include the above statement, because Sligo and Environs Plan 2010 has been incorporated into the CDP 2011-2017 and will continue to be part of the new CDP 2017-2023, unchanged, until the adoption of a local area plan for Sligo and Environs.

Retail development proposal in Sligo City, received before the adoption of the Sligo and Environs LAP, will be assessed based on the provisions of the Sligo and Environs Plan 2010 and those of the County Development Plan operational at the time of receiving the planning application.

**Recommendation**

No change to the Draft Plan and Environmental Report.

**Issue no. 5**

Tony Bamford indicates that Table 4.F mentioned in the strategic retail policy SP-RP-2 “is not included in the Retail Strategy” and the reference should be to Table 5.12 on p. 44 of the Retail Strategy.

He also proposes an addition to this policy, as follows:

**SP-RP-2** Ensure that additional retail floor space is provided in line with the projected requirements outlined in Table 4.F and in the County Sligo Retail Planning Strategy (2016).

*“Nonetheless, proposals for new retail development received prior to the forthcoming Local Area Plan and Retail Strategy for the City and Environs will be considered by the Planning Authority. Such applications should be accompanied by a Retail Impact and Capacity Assessments and depending on their location a sequential assessment to justify the proposed development”.*

## Opinion

The reference to Table 4.F relates to the table on p. 56 of the Draft Plan, which is extracted from Table 5.12 on p. 44 of the Retail Strategy. It is not considered necessary to amend this reference.

With regard to the assessment of retail development proposals received before the adoption of a local area plan for Sligo and Environs, please refer to the response to Issue no. 4 above.

## Recommendation

No change to the Draft Plan and Environmental Report.

## Issue no. 6

Tony Bamford refutes the suggestion that the N4 is a “major pedestrian barrier severing the city”, as stated on p. 45 of the Retail Strategy, considering that such statement is based on perception, not evidence.

He contends that there is substantial rationale for expanding the City Centre to the west of the Inner Relief Road and proposes the deletion of the following text (shown in red below) from the fifth paragraph in Section 6 of the Retail Strategy (p. 45 of the Strategy):

*The Strategy set out a rationale towards focussing new comparison retail development primarily into Sligo City centre, particularly on the back of the development of the Centre Block and attracting higher-order comparison-goods retailers into neighbouring development sites. The encouragement of site identification and assembly as a means towards focussing development into the city centre was proposed. In the absence of construction relating to the Centre Block Masterplan there has been minimal pressure for site assembly in the city centre. Furthermore, there has also been minimal rationale for extending the city centre into the area west of Hughes’ Bridge. The N4 national road (‘Inner Relief Road’) continues to act as a major physical barrier severing the city and proposals to improve pedestrian and vehicular linkages would remain essential to any further extension of the city centre west of the N4.*

## Opinion

As indicated under Issue no. 3 above, the forthcoming local area plan for Sligo and Environs will involve a thorough review of all policies and objectives included in the SEDP 2010. The future expansion of the City Centre and associated zoning will form part of that review.

## Recommendation

No change to the Draft Plan and Environmental Report.

## Issue no. 7

Tony Bamford suggests the following changes to a paragraph on p. 49 of the Retail Strategy, as follows (text in **green** to be added, text in **red** to be deleted):

### **Tier 1 – Primary Retail Centre (Sligo City)**

*While the convenience shopping function of the City Centre is important to its ongoing vitality, it is also necessary to ensure that convenience retail facilities are easily accessible across the City as a whole **including its dependent rural hinterland**. **Details regarding the location and scale of retail development in the city will be addressed in the future Sligo City Retail Strategy.** Over the period of the Plan it is anticipated that the majority of demand for comparison retail*

*growth will be centred upon Sligo city (Tier 1) and the Council should continue to focus comparison retailing into the city centre.*

T.B. requests these changes because he is concerned that “a future document (i.e. Sligo City Retail Strategy) could hold sway over existing planning policy and initiatives in the current Development Plan.”

### **Opinion**

As already explained above, retail development proposal in Sligo City, received before the adoption of the Sligo and Environs LAP, will be assessed based on the provisions of the Sligo and Environs Plan 2010 and those of the County Development Plan operational at the time of receiving the planning application.

Sligo City Retail Strategy, which will accompany the local area plan for Sligo and Environs, will be entirely consistent with the CDP 2017-2023 and the associated County Retail Strategy. There is no reason to delete a statement of intention regarding the City Retail Strategy.

The suggested reference to “dependent rural hinterland” is considered unnecessary in the context of the above paragraph. The reason for requesting this insertion is unclear.

### **Recommendation**

No change to the Draft Plan and Environmental Report.

## **Submissions no. 59 and 60**

29 November 2016

John O’Hara, Michael Rowley

### **Issue no. 1**

Both submissions object to the paragraph in section 13.4.3 of the Draft Plan, which recommends the use of a registered architect when planning to build a rural house. The paragraph in question reads as follows:

*“The Planning Authority strongly recommends employing a registered architect when planning to build a rural house, especially when modern design is envisaged. A registered architect is an architect with a relevant qualification in certain approved universities and institutes, who is listed on the Royal Institute of Architects Ireland (RIAI) Register of Architects. To find registered architects in your area, please consult the Register at RIAI.ie [http://www.riai.ie/register/the\\_register\\_of\\_architects](http://www.riai.ie/register/the_register_of_architects)”.*

J. O’Hara, an engineer, “fails to see how a newly qualified architect, with limited experience, would be more suitable to carry out the design of a rural dwelling house” and feels that his company will be “put at an unfair disadvantage” and he will incur a loss of earnings in the future.

M. Rowley, also an engineer, asks “what objective justification is there for excluding anybody with an engineering qualification ... for providing design and planning services when planning to build a rural house”.

### **Opinion**

Both John O’Hara and Michael Rowley misinterpreted the relevant paragraph in Section 13.4.3.

The Draft CDP does not contain any restriction or exclusion of any professional category currently involved in the planning and design process.

Section 13.4.3 provides general guidance on rural house design, in an effort to improve the standard of rural houses and their impact on the visual amenity of the countryside. The Planning Authority recommends the use of a registered architect to design houses, since these professionals are trained specifically to produce design solutions that address both clients' needs, landscape and heritage context, environmental considerations and aesthetic criteria. **This is only a recommendation, NOT a requirement.**

Applicants are entitled to employ whomever they choose to design their house. It is also important to note that there is no legislation requiring the preparation of planning applications by architects.

### **Recommendation**

No change to the Draft Plan and Environmental Report.

### **Submission no. 61**

29 November 2016

Heather Taylor

on behalf of The Parents and Guardians of Cregg Services (PGCS)

### **Issue no. 1**

The PGCS indicates that over 90 people with intellectual disabilities, currently living at the Cregg care facility, will be moving into the community in line with Government policy. These people require specialist housing and the organisation would like to see a specific strategy to support this.

The PGCS is concerned that "the process of de congregation from Cregg Services has not been named in the Housing Strategy for 2017-2023."

### **Opinion**

A *Strategic Plan for Housing People with a Disability 2016–2019* has been prepared for County Sligo. This *Strategic Plan* recognises that the de-congregation of Cloonamahon and Cregg is the most important priority for the Learning Disability and Autism Service of the HSE over the next five years.

The *Strategic Plan* states the following:

*The HSE Learning Disability and Autism Service are in the process of de-congregation of the Centres in Cregg House Sligo, Cloonamahon and Sligo. It is planned that these centres will close by 2020 and all persons living there will be more appropriately housed in communities either with their families or in locations they choose. It is normal practice that, during the transition from Congregated Setting Care to Independent/Supported Care, HSE nurses and care staff who have worked with such persons in the Congregated Setting will re-locate with the persons concerned. This provides a continuity of care. This practice will continue in the future.*

***A plan for the relocation of service users is in place and is reviewed on a year to year basis.***

Section 7.1.1 of the *Strategic Plan* sets out Sligo County Council's housing policy with regard to persons with a disability which includes services users from Cloonamahon and Cregg.

It is considered that the Draft CDP should be amended to make reference to the *Strategic Plan*.

## Recommendation

Modify **Section 5.5.2** of the Draft Plan as follows (additions in blue, deletions in red):

The *National Housing Strategy for People with a Disability 2011–2016* sets out the government's approach to addressing the housing needs of people with disabilities. The Strategy uses the term 'disability' in reference to four categories of disability, i.e. sensory disability, mental health disability, physical disability and intellectual disability.

The *Strategic Plan for Housing People with a Disability 2016–2019*, prepared by the Housing and Disability Steering Group of Sligo County Council and the HSE in 2016, fulfils the requirements of the National Strategy. The *Strategic Plan* establishes a policy framework to guide the provision of housing for people with a disability by the local authority and by other housing providers.

~~Sligo County Council's 2013 Housing Needs Assessment identified 192 households on the housing list which required disability adapted accommodation. These needs can be met through direct provision of accommodation by the Council or in conjunction with the HSE or the voluntary sector.~~

## Issue no. 2

The PGCS queries how the need for the provision of new facilities for day services will be encompassed in the Sligo Development Plan.

## Opinion

The provision of accommodation for delivering HSE services is not the responsibility of the Local Authority.

Volume 2 of the Draft County Development Plan contains 32 mini-plans for the County's towns and villages, the majority of which have land zoned specifically for community facilities, including buildings for the provision of healthcare or day care services.

In Volume 1, **Section 6.2 Delivering community facilities** (p. 87-88 of the Draft CDP) contains five relevant policies (P-CF-1 to P-CF-5), which indicate 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 etc). Any such proposal should be suitably located within the development limits of the relevant settlement and should be easily accessible for all sections of the community.

The above provisions are considered sufficient.

## Recommendation

No change to the Draft Plan and Environmental Report.

**Submission no. 63**

30 November 2016

Albert Higgins  
Chairperson of Aughamore Rowing Club

**Issue no. 1**

This submission refers to lands adjacent to Lough Gill at Aughamore Near, and requests that the Draft CDP designate this area for “sport, pleasure and fishing”.

**Opinion**

The lands at Aughamore Near are currently included in the area covered by the Sligo and Environs Plan 2010. The zoning and specific objectives set out in this Plan will be reviewed as part of the preparation of a local area plan for Sligo and Environs, following the adoption of the CDP 2017-2023.

**Recommendation**

No change to the Draft Plan and Environmental Report.

**Submission no. 68**

30 November 2016

Emma Flanagan, Cunnane Stratton Reynolds  
on behalf of Niall Clarke

**Issue no. 1**

The submission refers to the 10 acres of lands adjacent to Lough Gill, at Aughamore Near, on which the Aughamore Rowing Club has a site and boat house.

E. Flanagan argues that the Draft CDP fails to realise the full potential of Sligo’s waterways, particularly lakes. She notes that the Plan does not have any specific objective supporting ‘*the enhancement or development of water based activities*’. She proposes two policies supporting the development of water based tourism, as follows:

*‘Promote water based amenities relating to sailing, boating, and fishing and ancillary tourism and leisure related activities within the County and support the sustainable development of high-quality tourism and leisure facilities around the lakes and waterways to facilitate the development of water based tourism activities’.*

and

*‘Support and encourage the sustainable development and enhancement of water based tourism and related activities in Sligo recognising that the lakes and waterways of Sligo represent an important opportunity for the future development of tourism activities in Sligo and the region’.*

**Opinion**

The suggestion is noted. As a recognition of the leisure and tourism potential of the County’s lakes, it is agreed to include an additional policy relating to water-based activities.

## Recommendation

In **Section 6.7.4 Outdoor recreational amenities**, insert the following outdoor recreation policy after P-OR-14 (all subsequent policies will be renumbered in the final version of the CDP):

Support the sustainable development of water-based leisure, tourism and related activities in County Sligo, subject to compliance with the requirements of the Habitats Directive.

## Issue no. 2

E. Flanagan suggests the inclusion of a site-specific objective in the Draft CDP relating to the use of the lands at Aughamore Near for tourism purposes.

## Opinion

The lands at Aughamore Near are currently included in the area covered by the Sligo and Environs Plan 2010. The zoning and specific objectives set out in this Plan will be reviewed as part of the preparation of a local area plan for Sligo and Environs, following the adoption of the CDP 2017-2023.

## Recommendation

No change to the Draft Plan and Environmental Report.

## Submission no. 73

30 November 2016

Simon Davey  
Ballymote Supervalu

## Issue no. 1

S. Davey notes that while the current CDP 2011-2017 includes an objective to facilitate the provision of an additional supermarket in Ballymote, the Draft Plan states that the existing supermarket (i.e. Supervalu) is capable of facilitating weekly shopping and that “the economics or whether or not there is scope for an additional supermarket in Ballymote will primarily be dictated by the market.

S. Davey indicates that his supermarket is trading adequately at the moment and requests that any planning application for an additional supermarket in Ballymote be accompanied by a detailed Retail Impact Assessment. He also requests “safeguards” to be included in the Draft Plan and Retail Strategy.

## Opinion

The statement to which S. Davey refers is included in Section 3.2.2 of the County Retail Strategy, not in the Draft Plan. It represents an assessment of the current situation and future prospects.

In contrast with the existing CDP, the Draft CDP 2017-2023 does not include a specific objective to support the provision of an additional supermarket in Ballymote.

While the strategic retail planning policy SP-RP-3 indicates the Council’s support for “the provision or extension of retail facilities in the Key Support Retail Centres (Tier 2) of Tobercurry, Ballymote and Enniscrone”, policy P-RP-1 specifies that all proposals for retail development will be assessed in accordance with the requirements of the Retail Planning Guidelines (2012). This involves a Retail Impact Assessment where the proposed development is of a larger scale, as clarified in **Chapter 13**

**Development management standards, Section 13.5.5 Retail Impact Assessment** (p. 238 of the Draft Plan).

The above are considered to be sufficient “safeguards” against inappropriate retail development.

### **Recommendation**

No change to the Draft Plan and Environmental Report.

## **Submission no. 75**

30 November 2016

Claire Galligan

on behalf of the Disability Linkage Group (Sligo Public Participation Network)

### **Issue no. 1**

The submission welcomes the Draft Plan’s commitment to universal accessibility and design as reflected in Sections 6.2 Delivering Community Facilities, 13.2.7 Accessibility (Development management standards) and in the general policies for mini-plans.

### **Opinion**

The support it noted.

### **Recommendation**

No change to the Draft Plan and Environmental Report.

### **Issue no. 2**

The submission requests “*that the objective to meet and implement universal design standards and accessibility in the built environment*” be clearly stated in **Chapter 5 Housing** and **Chapter 8 Transport and mobility**.

### **Opinion**

**Section 13.2.7 Accessibility** (Chapter 13 – Development management standards) states that the Council will adhere to the principle of *universal accessibility* and will endeavour to ensure that the recommended standards set out in *Building for everyone – a Universal Design Approach (NDA, 2012)* are applied in internal and external built public environments where feasible.

Any development within the County should have regard to Chapter 13 and the development standards contained therein. It is not necessary to repeat this statement in two other sections.

### **Recommendation**

No change to the Draft Plan and Environmental Report.

### Issue no. 3

Noting that “standard disabled toilets” do not meet the needs of all people with disabilities, the submission requests the inclusion of specific provisions “to develop a *changing place* in Sligo as part of any town refurbishment works and/or retail development”.

#### Opinion

Changing facilities are covered in detail in the publication *Building for everyone – a Universal Design Approach* (NDA, 2012), which is mentioned in Section 13.2.7.

In Section **6.6. Healthcare facilities** (p. 92 of the Draft Plan), policy P-HC-3 supports the provision of healthcare services and facilities for people with learning disabilities and special needs. It is considered that this policy should be modified to include reference to universally accessible facilities for people with all types of disability. Reference should also be made to the publication *Building for everyone – a Universal Design Approach* (NDA, 2012).

#### Recommendation

In **Chapter 6 Community facilities, Section 6.6. Healthcare facilities** (p. 92 of the Draft CDP), modify policy P-HC-3 as follows:

- P-HC-3** Support the provision of healthcare services and universally accessible facilities for people with learning all types of disabilities and special needs, in accordance with the recommended standards set out in *Building for everyone – a Universal Design Approach* (NDA, 2012).

### Issue no. 4

This submission requests that ‘*integrated accessible transport provision*’ be stated as an objective in **Chapter 8 Transport and mobility**.

#### Opinion

It is recognised that the availability of accessible transport is essential for people with disabilities to engage in community life, education and employment. However, the provision of accessible transport facilities is outside the remit or control of the Local Authority. Public transport providers must operate within the framework set out by the Department of Transport, Tourism and Sport.

#### Recommendation

No change to the Draft Plan and Environmental Report.

### Issue no. 5

Provision should be made in the Draft Plan for improving accessibility to beaches in the County. This could include the provision of beach wheelchairs and universally accessible toilets and changing facilities.

#### Opinion

**Section 6.7.4** of the Draft CDP deals with outdoor recreational amenities. Policy P-OR-14 promotes the improvement of accessibility to a variety of outdoor areas, without referring specifically to beaches. This policy should be modified to include reference to beaches and universal design principles.

## Recommendation

In **Section 6.7.4 Outdoor recreational policies (p. 94097 of the Draft CDP)**, amend P-OR-14 as follows:

- P-OR-14** Preserve and improve access for the public to lakes, beaches, coastal, riverside, upland and other areas that have traditionally been used for outdoor recreation, subject to compliance with the requirements of the Habitats Directive. *Where feasible, apply or support the application of universal design principles, as recommended in [Building for everyone – a Universal Design Approach \(NDA, 2012\)](#).*

## Issue no. 6

The submission expresses concern with the title of **Section 5.5 Special needs housing** in the Draft CDP. It is suggested that “special needs” should be replaced with “diverse needs”.

## Opinion

Noted and agreed. Section 5.5 should be renamed “Housing for persons with diverse needs”.

## Recommendation

Modify the title of **Section 5.5** of the Draft Plan (p.79) as follows (additions in blue, deletions in red):

**Section 5.5** ~~Special needs housing~~ **Housing for persons with diverse needs**

## Issue no. 7

In relation to Cregg House and the Draft Plan policy to facilitate the phased redevelopment of existing Wisdom services care facility”, the Disability Linkage Group notes that “*the plan does not identify the housing strategy that is being pursued to address the needs arising from this project*” and suggests that “*the plan should acknowledge the need for joined up thinking and approaches to facilitating this move to the community, identifying how best the local authority can support this project*”.

## Opinion

Please refer to the Chief Executive’s opinion and recommendations regarding Submission no. 61.

## Recommendation

No further change to the Draft Plan and Environmental Report.

## Submission no. 77

30 November 2016

Peigin Doyle and others

## Issue no. 1

The submission seeks to highlight “an inherent contradiction within the CDP” which will “undermine the economic and job creation strategy set out by the LCDC in the Local Community Plan” and will contribute to the “degradation of the natural tourism resources, potential employment assets and social mix of Strandhill”.

Essentially, the submission claims that the tourism potential of the Strandhill area will be damaged “if priority is given to single houses in visually sensitive areas” and that the policy of “favouring landholders above residents” will lead to a situation where sites with planning permission will be sold to buyers who do not comply with the residency condition.

### **Opinion**

The rural housing policies for the County have been formulated having regard to the recommendations and requirements of the Sustainable Rural Housing Development Guidelines (DoEHLG, 2005).

These policies are proposed to be modified by removing the temporal and spatial constraints – refer to the Chief Executive’s Supplementary Recommendation regarding Rural Housing Policies.

The Planning Authority does not agree with the assertion in this submission that priority is given to single houses in visually sensitive landscapes, nor is it agreed that landowners are given priority over residents.

### **Recommendation**

No change to the Draft Plan and Environmental Report.

### **Issue no. 2**

This submission supports the inclusion of public rights of way in the Draft CDP, namely in Section **6.7.4 Outdoor recreational amenities** and requests that three public rights of way in Strandhill be recorded for protection in the CDP.

### **Opinion**

Please refer to Chief Executive’s Supplementary Recommendation regarding public rights of way.

### **Recommendation**

No change to the Draft Plan and Environmental Report.

## **Submission no. 79**

30 November 2016

Liam Flynn, McCarthy Keville O’Sullivan  
on behalf of Enerco Energy Ltd.

### **Issue no. 1**

The submission welcomes the policy provisions in the CDP relating to wind energy, noting that the Draft Plan allows flexibility regarding the location of wind energy development proposals, without indicating where such proposals would be acceptable.

The lack of a wind energy strategy or policy provisions to formulate one in the lifetime of the new CDP is noted.

Anticipating a possible future requirement for local authorities to prepare Wind Energy Strategies, after the publication of revised Wind Energy Development Guidelines, the submission provides information on the key considerations which should influence the development of any such strategy.

It is suggested to include a policy in the new CDP committing the Planning Authority to prepare a renewable or wind energy strategy for the county within the lifetime of the Plan.

### **Opinion**

The suggestion is noted. At present, there is no requirement for planning authorities to prepare renewable or wind energy strategies in conjunction with their development plans.

However, there is no objection to the undertaking of an *analysis of suitable areas for wind energy*, using the step-by-step guide provided in the Wind Energy Guidelines 2006.

### **Recommendation**

In Chapter **11 Energy and telecommunications, Section 11.1 Energy**, add the following:

#### **Strategic energy objective**

- SO-N-1** Undertake an analysis of suitable areas for wind energy and prepare a map showing County Sligo's Landscape Suitability for Wind Energy Developments, in accordance with Section 3.5 of the Wind Energy Guidelines (2006).

## **Submission no. 84**

30 November 2016

Cecily Gilligan

### **Issue no. 1**

This submission requests that a local road from the Crossboy junction on the R-297 to the Lough Gill be designated as a Scenic Route.

### **Opinion**

Designated *scenic routes* are public roads which pass through or close to *sensitive rural landscapes* or in the vicinity of *visually vulnerable areas*, and which afford unique scenic views of distinctive natural features or vast open landscapes.

This submission refers to the L-7604-13 in the townlands of Killery, Crossboy and Gortlowan. It is considered that scenic views of the surrounding landscape (including Lough Gill, Innisfree, Killery and Keelogyboy mountains etc.) are available from the last 500 m (approximately) of this road, in the vicinity of Lough Gill's shores.

The local road crosses a substantial area designated as *sensitive rural landscape*. Lough Gill is also a designated *visually vulnerable area*. It is considered that these designations are sufficient to protect this landscape from inappropriate development which would injure the visual amenity of the area.

### **Recommendation**

No change to the Draft Plan and Environmental Report.

**Submission no. 85**

30 November 2016

Eddie O’Gorman (Chairperson) and Declan Bruen (Treasurer)  
on behalf of Grange and Armada Development Association

**Issue no. 1**

This submission requests the inclusion of additional text in **Section 4.4.5 Cultural tourism** of the Draft CDP and in Box 4.D Opportunities for cultural tourism, as follows:

- in Section 4.4.5:

*The Spanish Armada wrecks site at Streedagh is a unique maritime world heritage site. The recent recoveries from the site, including nine cannon and other artefacts, is just the start of an archaeology project that has world-wide, historical significance.*

- in Box 4.D:

**Project name:** *Spanish Armada Wrecks Site at Streedagh*

**Description:** *The conservation, management and interpretation of the internationally important Spanish Armada wrecks site at Streedagh, Co. Sligo.*

*Development of a Spanish Armada Interpretive and Visitor Centre and other ancillary tourist facilities at Grange, Co. Sligo*

**Opinion**

The text of Section 4.4.5 provides a short, general description of cultural tourism in County Sligo. It is not considered necessary to highlight a specific potential tourism product in this section.

However, there is no objection to including the suggested text relating to the Spanish Armada in Box 4.D.

**Recommendation**

Modify **Box 4.D** in **Section 4.4.5 Cultural tourism** (p.50 of the Draft CDP) by adding the following text:

Potential project name	Description
Spanish Armada Visitor Centre	Conservation, management and interpretation of the Spanish Armada wrecks site at Streedagh and development of a visitor centre.

**Submission no. 88**

30 November 2016

Marice Henry

**Issue no. 1**

This submission refers to the zoning of several sites within the Sligo and Environs area, located at Cummeen, Tullynagracken North and Cornageeha.

### **Opinion**

Lands at Cummeen, Tullynagracken North and Cornageeha are currently included in the area covered by the Sligo and Environs Plan 2010. The zoning and specific objectives set out in this Plan will be reviewed as part of the preparation of a local area plan for Sligo and Environs, following the adoption of the CDP 2017-2023.

### **Recommendation**

No change to the Draft Plan and Environmental Report.

### **Submission no. 91**

30 November 2016

Stella Burke

Irish Wind Energy Association

### **Issue no. 1**

This submission welcomes Sligo County Council's support of renewables and wind energy in particular. It indicates that existing CDP policies **P-REN-1** (*Support and promote a move away from fossil-fuel energy production through investment in renewable energy*) and **P-REN-2** (*Encourage and facilitate the sustainable production of energy from renewable sources, energy conversion and capture in forms such as wind power, hydro-power, wave generated energy, biomass, solar technology and energy-efficient building design/ servicing*) should also be included in the new CDP.

### **Opinion**

The suggestion is noted. However, it is considered that the strategic energy policies contained in the Draft CDP (p. 192) adequately cover the matters referred to in existing CDP policies P-REN-1 and P-REN-2.

### **Recommendation**

No change to the Draft Plan and Environmental Report.

### **Issue no. 2**

S. Burke notes the objective **O-REN-1**, in the current CDP, to prepare a Wind Energy Strategy. The IWEA would welcome the preparation of such a strategy for County Sligo. The strategy should include clear targets for wind energy production and should clearly set out the adopted methodology in arriving at areas designated as preferred for wind energy development and those where such development would be discouraged.

### **Opinion**

The suggestion is noted. At present, there is no requirement for planning authorities to prepare renewable or wind energy strategies in conjunction with their development plans.

However, there is no objection to the undertaking of an *analysis of suitable areas for wind energy*, using the step-by-step guide provided in the Wind Energy Guidelines 2006.

## Recommendation

In Chapter **11 Energy and telecommunications**, **Section 11.1 Energy**, add the following:

### Strategic energy objective

- SO-N-1** Undertake an analysis of suitable areas for wind energy and prepare a map showing County Sligo's Landscape Suitability for Wind Energy Developments, in accordance with Section 3.5 of the Wind Energy Guidelines (2006).

## Issue no. 3

IWEA suggests that the new County Development Plan should “*contain a proactive approach to the co-location of other forms of low carbon generation or technologies which may increase the efficiency of any existing renewable technology, including potentially changes to the layout of the existing assets to accommodate this*”.

## Opinion

The co-location of renewable technology equipment is a matter to be dealt with on a case-by-case basis, during the pre-planning and planning application process, applying normal planning considerations such as visual, landscape, heritage, environmental and amenity considerations, and appropriate consideration of the requirements of the Habitats Directive.

## Recommendation

No change to the Draft Plan and Environmental Report.

## Submission no. 89

30 November 2016

Roger Garland on behalf of Keep Ireland Open (KIO)

## Issue no. 1

Roger Garland makes a 95-page submission, indicating that its scope is “limited to access to the countryside and directly related issues”.

The submission proposes a large number of minor changes, ranging from single words to be included in various sentences, to whole paragraphs and policies adapted or copied from other local authorities' development plans. There are also numerous suggestions for relocating policies to other chapters in the Draft Plan, and for renaming various subsections.

## Opinion

At pre-draft stage, Roger Garland made an 89-page submission containing a large number of very detailed suggestions for the Draft CDP 2017-2023 in terms of the wording of policies, objectives and narrative. The suggestions were accompanied by references to or extracts from other local authorities' development plans.

The current submission is similar to the pre-draft one, but longer.

The pre-draft submission made by KIO has been taken into account in the preparation of the Draft Plan. It is not considered necessary to make any further changes on foot of this submission.

## Recommendation

No change to the Draft Plan and Environmental Report.

Fintan Morrin, Associate, The Planning Partnership  
on behalf of Lidl Ireland GmbH

**Issue no. 1**

The submission contends that the Draft Plan and the Retail Strategy “*acknowledge a general shortfall of convenience facilities*” in the key support towns of Tobercurry, Ballymote and Enniscrone, and at the same time “*the policies and commentary therein could be construed as restricting the expansion of the convenience sector*”.

**Opinion**

In accordance with the findings of the Retail Strategy, the Draft Plan indicates that a modest increase in convenience shopping is likely to be required in Sligo City and the Key Support Towns of Ballymote, Enniscrone and Tobercurry.

Furthermore, the Draft Plan supports this increase by lifting the 500-sq.m. floor space cap previously applied to these towns, encourages site assembly to support convenience retail provision and indicates that Enniscrone is capable of absorbing a larger convenience retailer, which might reduce shopping journeys to Ballina or other centres. These provisions cannot be construed as restrictive on the convenience sector.

**Recommendation**

No change to the Draft Plan and Environmental Report.

**Issue no. 2**

It is contended that the floor space requirements are underestimated, due to the use of a “potentially excessive floor space turnover ratio”. It is suggested that the retail leakage to other counties may be higher than what is assumed in the Retail Strategy. It is also indicated that the net sales density of €11,918 is excessive, especially compared to net sales densities such as €8,347 in Co. Longford and €10,355 in Co. Leitrim. The submission suggests that the actual requirement for additional floor space is significantly higher, i.e. 6,770 sq.m. instead of 2,492 sq.m.

**Opinion**

Having regard to the geographical location of County Sligo, relatively far from Dublin and other substantial urban centres that may cause retail leakage (as it happens in counties such as Leitrim or Longford), it is considered that the assumptions and estimates provided in Section 5.3 Future floor space requirements (p. 39 to 44 of the Retail Strategy) are reasonable.

**Recommendation**

No change to the Draft Plan and Environmental Report.

**Issue no. 3**

It is submitted that the Draft Plan and Retail Strategy should explicitly refer to the floor space projections as “minimum requirements”, and seek to encourage retailers to exceed these levels, subject to appropriate retail impact assessment of proposals on town centres, as specified in national policy, i.e. the Retail Planning Guidelines.

### **Opinion**

Policy **P-RP-1** (p. 60 of the Draft Plan) clearly states that the Planning Authority will assess all proposals for retail development in accordance with the requirements of the Retail Planning Guidelines (2012).

It is considered undesirable to encourage new retail development proposal to exceed the projected floor space requirements as long as there is a substantial level of retail vacancy, even in those town where the current convenience retail provision is insufficient.

### **Recommendation**

No change to the Draft Plan and Environmental Report.

### **Issue no. 4**

The submission calls on the Planning Authority to use its statutory powers to assemble sites in Key Support Towns instead of encouraging site assembly by private developers who wish to provide convenience shopping facilities. Such developers “are invariably not in a position to assemble appropriate backland sites”.

If site assembly is not driven by the Planning Authority, this should not prevent the development of convenience facilities on the edge of town centres, in accordance with the sequential approach.

### **Opinion**

The Planning Authority is not opposed to using its statutory powers to assemble sites in Key Support Towns, in the interest of facilitating the provision of adequate retail or other facilities in a manner that consolidates town centres as opposed to undermining them.

While the CDP is not the ideal policy instrument to specify such interventions, it would be appropriate to consider the option of site assembly through the use of statutory powers by the Planning Authority as part of the preparation or review of local area plans for the county’s Key Support Towns.

In all cases, as mentioned above, proposals for retail development will be assessed in accordance with the requirements of the Retail Planning Guidelines (2012), which require the preparation of retail impact assessments.

### **Recommendation**

No change to the Draft Plan and Environmental Report.

### **Submission no. 99**

30 November 2016

Colm McLoughlin, McCutcheon Halley Planning Consultants  
on behalf of the Mullan family

### **Issue no. 1**

The Mullan family owns circa 29 hectares of land in the south-west of Sligo City, at Derrydarragh and Oakfield. Parts of the lands are currently zoned for community purposes, open space, but most of the land holding is designated as Green Belt in the Sligo and Environs Development Plan 2010. It is

suggested that these lands are well-positioned to enable the development of the city along key infrastructures and avoiding sensitive areas.

While the Mullan family understands that the zoning of lands within the Sligo Environs area is not up for consideration as part of the Draft CDP, the Mullans wish to ‘*highlight their desire to work with the Council to ensure that the overarching aims of the Draft CDP can be met*’.

### **Opinion**

The observations are noted.

The subject lands are currently included in the area covered by the Sligo and Environs Plan 2010. The zoning and specific objectives set out in this Plan will be reviewed as part of the preparation of a local area plan for Sligo and Environs, following the adoption of the CDP 2017-2023.

### **Recommendation**

No change to the Draft Plan and Environmental Report.

## **Submission no. 108**

30 November 2016

Trevor Sadler, Director, McGill Planning Ltd  
on behalf of Oaktree, owners of the Sligo Retail Park (Carrowroe)

### **Issue no. 1**

The submission offers details regarding the current occupants of Carrowroe Retail Park and supports the strategic retail policies of the Draft Plan, as well as the objective restricting further development of retail warehousing in Collooney and Grange.

### **Opinion**

The information and the support are noted.

### **Recommendation**

No change to the Draft Plan and Environmental Report.

### **Issue no. 2**

Anticipating that the vacancy levels at the Retail Park (currently 4 units) will reduce over the short term, the submission indicates that some realignment and expansion of existing units will be necessary.

It is requested that the wording under the “Bulky goods floor space” sub-heading in Section 4.5.2 (p. 57 of the Draft Plan) be revised as follows:

*“The extent of additional bulky goods retail floor space expected over the Plan period can therefore readily be absorbed ~~in~~ through a combination of the existing stock of vacant retail space and incremental expansion and evolution of existing stores.*”

## **Opinion**

The County Retail Strategy indicates that there is a significant oversupply in retail warehousing and there is a need to constrain this type of development (Section 7.1.3 of the Strategy, third paragraph on p. 48). The Draft Plan reiterates the findings of the Retail Strategy in Section 4.5.2.

The requested modification to the Draft Plan would conflict with the recommendations of the Retail Strategy.

## **Recommendation**

No change to the Draft Plan and Environmental Report.

## **Issue no. 3**

The submission suggests that the Plan should acknowledge the potential of vacant sites currently zoned “retail park”, for which there is no demand, to be considered for rezoning in the future.

It is also requested that the second paragraph under the heading Retail Warehousing on p. 51 of the Retail Strategy be augmented as follows:

*“Consideration should also be given to alternative uses for existing vacant retail warehouses, provided proposals are not contrary to the proper planning and sustainable development of the area. The occupancy of these units, for purposes deemed compatible with the adjacent land uses in the area provides a better alternative than to allow these units to remain vacant and inevitably fall into a state of disrepair. **Similarly the rezoning of vacant retail park zoned lands for alternative commercial uses that complement adjoining land uses/zonings should be considered in light of the presumption against any additional retail park development for the foreseeable future.**”*

## **Opinion**

The zoning and specific objectives set out in the Sligo and Environs Development Plan 2010 will be reviewed and possibly modified as part of the preparation of the Sligo and Environs Local Area Plan. The CDP 2017-2023 should not pre-empt the outcome of this review by including specific objectives for retail development in Sligo City.

The proposed addition to the text on p. 51 of the Retail Strategy is unnecessary, given that the zoning of all lands in the Sligo and Environs Plan area will be reviewed as part of the preparation of the local area plan.

## **Recommendation**

No change to the Draft Plan and Environmental Report.

**Submission no. 110**

30 November 2016

Finbarr Filan  
on behalf of Renua Ireland (Sligo-Leitrim)

**Issue no. 1**

This submission requests that the housing policy in rural areas under urban influence be amended by reducing the minimum residency period for returning emigrants and “*rural job creators*” from seven years to two years.

**Opinion**

In advance of a potential modification of the *Sustainable Rural Housing Guidelines* (DoEHLG, 2005), it is proposed to amend the rural housing policy in Rural Areas under Urban Influence in a manner that would make it compatible with Article 43 (freedom of movement of people) and Article 56 (freedom of movement of capital) of the EC Treaty.

All spatial and temporal and restrictions, such as the seven years minimum residency period, are to be omitted from the policy. Please refer r to the Chief Executive’s Supplementary Recommendation regarding Rural Housing Policies.

**Recommendation**

No change to the Draft Plan and Environmental Report on foot of this submission.

**Submission no. 112**

30 November 2016

Michael Rowley

**Issue no. 1**

This submission objects to the inclusion of some of the principles of vernacular rural house design set out in section 13.4.3 of the Draft CDP. Specifically, M. Rowley objects to the guidelines in relation to form, chimneys, eaves, fascia, rainwater goods and external finishes. It is argued that this section does not “*appear sustainable or environmentally aware*” and the application of these principles could lead to “*possible damp issues in new structures*”.

**Opinion**

Section 13.4.3 sets out some basic principles of vernacular architecture in tabular form. It indicates that all new rural housing designed in a vernacular style should have regard to these principles. **The table is for guidance only.**

The guidance should be used where appropriate, having regard to the particular context of the proposed development. Table 13.A is particularly relevant for applicants wishing to design and build a house in a traditional rural style. The text of this section was written in consultation with the Architects’ Department of Sligo County Council.

In the interests of clarity, it is considered appropriate to review some of the wording used in section 13.4.3 of the Draft CDP, to reflect the non-restrictive nature of the guidance and to emphasise that Table 13.A is relevant only for houses designed in a traditional style.

**Recommendation**

Amend **Section 13.4.3 Rural house design** as follows (additions in blue, deletions in red):

**13.4.3 Rural house design**

The Planning Authority welcomes innovative design, both contemporary and traditional. Buildings should be simple in terms of design and materials

All new rural housing **designed in a traditional style** should have regard to the principles of traditional rural design as set out in the Table 13.A below.

~~Principles of vernacular rural design~~ **A guide to designing a house in the rural vernacular style**

<b>Main features of vernacular rural design</b>	
<b>Proportions</b>	<ul style="list-style-type: none"> <li>• Ensure good roof-to-wall proportions and a high solid-to-void relationship (i.e. greater wall surface than windows and doors).</li> <li>• Composition of windows and doors should be simple and generally symmetrical.</li> <li>• Aim to minimise the distance between the top of the ground-floor windows and the sill of the first-floor windows to achieve good proportions.</li> </ul>
<b>Scale</b>	<ul style="list-style-type: none"> <li>• A large house needs a large site to ensure effective integration into its surroundings (either immediately or in the future, through planned screening).</li> <li>• Larger houses (e.g. in excess of 200 m2) should be sub-divided into smaller elements of traditional form to avoid bulky structures.</li> <li>• Have regard to the scale of surrounding buildings.</li> </ul>
<b>Form</b>	<ul style="list-style-type: none"> <li>• Use a simple plan form to give a clean roof shape – a long plan in preference to a deep plan. This will avoid the creation of a bulky shape.</li> <li>• Gable widths should generally not exceed 8 m, (recommended under 6.5 m for narrow plan form)</li> <li>• A traditional storey-and-a-half house with a narrow plan form is preferable to a dormer-style bungalow.</li> <li>• The form of a house affects the appearance of gable elevations. Gable elevations shall be simple and <b>roof pitch</b> generally symmetrical.</li> </ul>
<b>Details</b>	
<b>Windows</b>	<ul style="list-style-type: none"> <li>• The size and shape of windows should be <b>consistent uniform</b> on all elevations. Windows should be well proportioned, with a vertical emphasis.</li> <li>• Dormer and bay windows <del>are not vernacular features and</del> should be used sparingly. These features may not be considered appropriate at prominent or scenic locations.</li> <li>• Roof lights are preferable to mid-roof dormers.</li> </ul>
<b>Roof</b>	<ul style="list-style-type: none"> <li>• Roof pitch should range from 35° to 42°</li> <li>• Natural slate or natural effect slate is preferable</li> </ul>

<b>Chimneys</b>	<ul style="list-style-type: none"> <li>Chimneys should <b>generally</b> be placed centrally on the ridge and should have vernacular proportions (<del>i.e. they should be c.1.2 m wide</del>).</li> <li>Chimneys at a gable end should be flush with the gable.</li> </ul>
<b>Eaves</b>	<ul style="list-style-type: none"> <li><b>The eaves of a typical vernacular dwelling would <del>should</del></b> be flush with the wall, soffit omitted and slate <b>would <del>should</del></b> not project beyond the face of the wall.</li> <li>Roofs would be constructed without projecting soffit and barge at gable, and without boxed eaves detail.</li> <li><del>Eaves lines should be kept simple.</del></li> </ul>
<b>Fascia</b>	<ul style="list-style-type: none"> <li>An overhanging roof with a large fascia board adds bulk and clutter to a house.</li> <li>Decorative fascias or white PVC fascias should be avoided.</li> </ul>
<b>Rainwater gutters/down pipes</b>	<ul style="list-style-type: none"> <li><b>In vernacular houses,</b> rainwater gutters <b>would <del>should</del></b> be affixed to a corbelled eaves course of concrete, brick or stone (as appropriate).</li> <li>Simple, black, round plastic/<del>cast-iron or aluminium</del> rainwater gutters are recommended.</li> </ul>
<b>Doors</b>	<ul style="list-style-type: none"> <li>Doors should be painted timber and simple in style.</li> <li><del>PVC doors visible from the public road will not be permitted.</del></li> <li>Doors should always reflect the shape of the opening.</li> <li>A fan light above the door or a window to the side of the doorway is preferable to large glazed panels on the door.</li> </ul>
<b>Porches and conservatories</b>	<ul style="list-style-type: none"> <li>Porches and conservatories should be simple in design and in proportion to the building.</li> <li>The use of mock classical type porches should be avoided.</li> </ul>
<b>External finishes</b>	<ul style="list-style-type: none"> <li>Plastered or rendered walls are suitable finishes for a rural house.</li> <li>Brick, random rubble stone and pebble dash are not traditional finishes for a rural dwelling and should be avoided.</li> </ul>

**Submission no. 113**

30 November 2016

Jim Sheridan

**Issue no. 1**

This submission relates to **Section 13.3.15 Accommodation for dependent relatives** (p. 229 of the Draft CDP), which indicates that such accommodation should not generally exceed a gross floor area of 50 sq.m. It is suggested that this size limit be omitted from Section 13.3.15 and that such proposals be examined on a case-by-case basis. Omission of the size limit would allow more comfort for the dependent relative and would cater for special mobility needs.

**Opinion**

Noted and agreed. It is considered appropriate to increase the upper size limit from 50 sq.m. to 70 sq.m and to insert additional guidance for the development of such structures.

## Recommendation

In **Section 13.3.15 Accommodation for dependent relatives**, modify the text as follows (additions in blue, deletions in red):

The provision of accommodation for dependent relatives by way of a new extension to the existing dwelling shall be subject to all of the following requirements:

- The accommodation shall generally not exceed a gross floor area of ~~50~~ 70 sq.m.
- It shall be attached and linked internally to the existing dwelling.
- ~~It shall be linked internally with the existing dwelling.~~
- The structure shall be in accordance with the guidance in **Section 13.3.14 House extensions**.
- The accommodation and the main house shall remain in a single ownership.

**Submission no. 115**

30 November 2016

Eimear Lenehan, Lead Consent Manager  
on behalf SSE (Renewables) Ireland Ltd

### Issue no. 1

SSE suggests that the new CDP “*would benefit from a specific policy statement for the development of renewable energy aligned with the national policy for decarbonisation and the important contribution required from renewable electricity to achieve a national low carbon economy and the local economic, social and environmental benefits*”.

It is claimed that this would benefit the developers in assessing potential sites and would assist the Planning Authority in making planning decisions.

### Opinion

In **Section 11.1 Energy**, strategic policies **SP-EN-2** to **SP-EN-6** (p. 192 of the Draft CDP) support and promote the production of energy from renewable sources. SP-EN-6 specifically supports “*the implementation of relevant programmes arising from the Government’s Energy White Paper ‘Ireland’s Transition to a Low Carbon Energy Future 2015-2030*”.

It is considered that the Draft CDP adequately expresses support for renewable energy, in line with national policy.

### Recommendation

No change to the Draft Plan and Environmental Report.

### Issue no. 2

SSE suggests that the County Development Plan should “*contain a proactive approach to the co-location of other forms of low carbon generation or technologies which may increase the efficiency of*

*any existing renewable technology, including potentially changes to the layout of the existing assets to accommodate this”.*

### **Opinion**

The co-location of renewable technology equipment is a matter to be dealt with on a case-by-case basis, during the pre-planning and planning application process, applying normal planning considerations such as visual, landscape, heritage, environmental and amenity considerations, and appropriate consideration of the requirements of the Habitats Directive.

### **Recommendation**

No change to the Draft Plan and Environmental Report.

## **Submission no. 118**

30 November 2016

Jarlath Taheny

### **Issue no. 1**

This submission highlights issues that arose during the floods of December 2015 in the Collooney area. Both short- and long-term solutions are proposed including the following:

- Dredging the river basin;
- Restoring the barrier wall;
- Removal of fallen trees;
- The installation of road markers to help locals navigate the road under flooding.

The submission attributes the flooding to increased surface run-off from nearby roads and commercial development and the ‘reduced flow attenuation’ of the river. It is hoped that *“a management plan will be included in the local area plan to address these issues and deliver some of the solutions”*.

### **Opinion**

This submission refers to lands in the vicinity of the villages of Ballysadare and Collooney. The submission refers specifically to 6 individual houses in the open countryside which experienced flooding in December 2015 caused by the overflow of the Ballysadare River.

Both Ballysadare and Collooney were included in the Strategic Flood Risk Management Assessment (SFRA) prepared by Sligo County Council which informed the Draft Plan.

Based on information derived from the OPW flooding maps, in particular the detailed CFRAM mapping prepared in respect of Ballysadare and Collooney, the zoning of land for development was carefully scrutinised. The Draft Plan proposes de-zoning or rezoning of land at a high risk of flooding. The affected residences mentioned in this submission are located outside the area zoned for development. Short-term and long-term solutions to avoid future damage from flooding may indeed be necessary, but such solutions are not matters to be addressed in the context of the new County Development Plan 2017-2023.

### **Recommendation**

No change to the Draft Plan and Environmental Report.

Simon Bradshaw, GVA Planning and Regeneration Ltd  
on behalf of Tesco Ireland Limited

**Issue no. 1**

The submission details the retailer's operational requirements and outlines concerns regarding potential restrictions on deliveries and on related noise levels. It is requested that no such policies be introduced as part of the Draft CDP.

Furthermore, the submissions requests "*policies which provide flexibility and allow for the development of convenience retailers in accessible locations*", in order to "*ensure that suitable sites can be brought forward which can accommodate a modern format retailer*" and to "*support the designated centres.*"

**Opinion**

There are no policies in the Draft Plan regarding noise generated by supermarket deliveries.

It is not clear what is meant by "*policies which provide flexibility and allow the development of supermarkets in accessible locations*".

All proposals for convenience retail developments will be assessed based on the Retail planning policies set out in Section

**Recommendation**

No change to the Draft Plan and Environmental Report.

**Issue no. 2**

Noting that the Draft CDP retains the existing standard of 1 space per 18 sq.m. of floor space, the submission requests that this requirement be changed to 1 space per 14 Esq. for supermarkets across the county, and that the Plan clarifies that this refers to gross floor space.

**Opinion**

The supermarket car parking requirement applies to gross floor space. The omission in Table 13.B (p. 249-251) of the Draft Plan should be rectified.

It is considered that the supermarket car parking requirement of 1 space per 18 sq.m. is in line with other local authorities' requirements. For example, Dublin City Council limits supermarket car parking to 1 space per 30 sq.m. outside the City Centre, Donegal County Council requires 1 space per 20 sq.m, and Galway County Council has the same requirement as Sligo County Council, i.e. 1 space per 18 sq.m. of gross floor space.

**Recommendation**

Rectify the omission in Table 13.B, indicating that the car parking requirement applies to gross floor space.

### **Issue no. 3**

The standards set out in Section 13.5.9 of the Draft Plan, in relation to signage for retail developments, are considered “very prescriptive”, “excessively onerous” and “broad brush approach to managing the provision of signage within Sligo”.

It is requested that these standards be amended to allow for flexibility in relation to signage and to allow for innovative design solutions.

### **Opinion**

The above-mentioned development standards and the relevant urban design policy **P-UD-8** (which requires shop fronts and advertisement signs to match the overall form and structure of the building on which they are installed) are in accordance with the guidelines set out in the Retail Design Manual (DECLG, 2012). The overall purpose of this guidance is to protect and enhance the public realm in urban centres, thereby attracting more visitors to these areas, which is also of benefit to retailers.

### **Recommendation**

No change to the Draft Plan and Environmental Report.

### **Submission no. 121**

30 November 2016

John Bailey

### **Issue no. 1**

This submission requests that the following policy be considered for inclusion in the Draft CDP:

*With the express and sole purpose of safeguarding the population and environment of County Sligo, this Counties Planning Authority will take all necessary steps to ensure the prevention of damage to persons, livestock or land that would result from pollution, be it waterborne or airborne, that is a consequence of planned and unplanned events associated with the exploration or extraction of shale gas by hydraulic fracturing, travelling across County Sligo's boundaries with neighbouring Counties, including those adjoining County Sligo that are part of Northern Ireland.*

### **Opinion**

Please refer to the Chief Executive’s opinion and recommendation regarding **Issue no. 10** of Submission no. 86 (Northern and Western Regional Assembly).

### **Recommendation**

No further change to the Draft Plan and Environmental Report on foot of this submission.

**Submission no. 122**

29 November 2016

Peter Bowen-Walsh  
on behalf of West=on=Track

**Issue no. 1**

This submission requests that Sligo County Council insert a policy objective in the Draft Plan ‘*advocating completion of a Railway Order in conjunction with Mayo County Council pertaining to the disused railway line from Collooney Junction to Claremorris*’. Until such an order is completed, there should be no change to the current plan.

P. Bowen Walsh contends that “*A Railway Order would provide clarity to both Local Authorities regarding selection of the optimal route. Twenty two miles of the line are in Co. Sligo and 24 miles, are in Co. Mayo.*”

**Opinion**

A “Railway Order” means an order made under section 43 of the Transport (Railway Infrastructure) Act, 2001. Under Section 37 of the said Act, “*the Agency, CIÉ, or any other person with the consent of the Agency, may apply to the Minister for a railway order*”.

While an application for a Railway Order may be a matter for the Council to consider, it is outside the remit of the County Development Plan.

**Recommendation**

No change to the Draft Plan and Environmental Report.

**Submission no. 127**

30 November 2016

Gearoid Surlis  
Tobercurry Supervalu

**Issue no. 1**

This submission refers to a statement in the Draft Plan which reads as follows:

*There would appear to be some scope for additional convenience retail within the town, particularly aimed at providing additional opportunities for undertaking weekly shopping. The previous 2009 Retail Strategy claims that Tubbercurry had a similar retail mix to Ballymote. Our analysis indicates that Tubbercurry comprises less convenience retail floorspace than Ballymote and that there is a larger retail catchment supporting this. An additional convenience retail facility would need to be sited in a location that could provide footfall along the main shopping streets.*

G. Surlis indicates that the supermarket “is trading adequately at the moment”. He requests that any planning application for an additional supermarket in Tobercurry be accompanied by a detailed Retail Impact Assessment, and that “safeguards” with regard to RIS be included in the final Plan and Retail Strategy.

## **Opinion**

The statement to which G. Surlis refers is included in Section 3.2.1 of the County Retail Strategy, not in the Draft Plan. It represents an assessment of the current situation and future prospects.

While the strategic retail planning policy SP-RP-3 indicates the Council's support for "the provision or extension of retail facilities in the Key Support Retail Centres (Tier 2) of Tobercurry, Ballymote and Enniscrone", policy P-RP-1 specifies that all proposals for retail development will be assessed in accordance with the requirements of the Retail Planning Guidelines (2012). This involves a Retail Impact Assessment where the proposed development is of a larger scale, as clarified in **Chapter 13 Development management standards, Section 13.5.5 Retail Impact Assessment** (p. 238 of the Draft Plan).

The above are considered to be sufficient "safeguards" against inappropriate retail development.

## **Recommendation**

No change to the Draft Plan and Environmental Report.

# Submissions received before or after the public consultation period

**Early Submission no. E-1**

18 July 2016

Martin Timoney

## **Issue no. 1**

This submission expresses concern regarding the green belts proposed around the towns and villages of County Sligo. It contends that “*there are already far too many impositions on those wanting to build, live and work in the County*”.

## **Opinion**

Proliferation of development, including dispersed dwellings in rural areas, can have a detrimental effect on the long-term viability of towns and villages. Such developments can also be expensive to sustain in terms of transport, essential services and infrastructure (water and wastewater).

In the interest of preventing urban sprawl and preserving the visual identity of Sligo’s towns and villages, green belts have been established as part of the preparation of local area plans and mini-plans since 2003 (the first being the buffer zone in Strandhill LAP).

The main purpose of the green belt policy is to protect the land around towns and villages from unnecessary development and maintain the designated areas mainly for agriculture or forestry.

It is essential that settlements are consolidated within the limits set out in their land-use plans (local area plans and mini-plans), while retaining a strong spatial and visual identity that differentiates them from the surrounding countryside.

It is also important to protect wildlife habitats and reduce the risk of pollution to lakes, rivers, streams and groundwater from an accumulation of individual wastewater treatment systems in the areas around towns and villages, which are under constant pressure for one-off housing.

The submission made by Niall Cussen, Principal Planning Adviser, on behalf of the Minister for Housing, Planning, Community and Local Government, endorses the use of green belt policies around settlements in County Sligo, in order to manage growth and avoid sprawl (refer to Submission no. 52, Issue no. 1). Such policies ensure there is a clear demarcation between built-up areas and the surrounding countryside through appropriate zoning objectives, development limits and plan limits.

## **Recommendation**

No change to the Draft Plan and Environmental Report.

## **Late Submission no. L-1**

1 December 2016

Inspector Padraic Burke, Acting Superintendent  
Ballymote Garda District Office

### **Issue no. 1**

This submission recommends the provision of a pedestrian crossing in Enniscrone, as there is currently no safe place for crossing the road.

#### **Opinion**

The Enniscrone Local Area Plan 2014-2020 recognises the need for significant improvements along Main Street in terms of pedestrian safety and amenity. It is an objective of this LAP to prepare a Traffic Management Plan for Enniscrone, in accordance with the requirements of the Design Manual for Urban Roads and Streets (2013). Such a plan will address the concerns raised in the submission.

#### **Recommendation**

No change to the Draft Plan and Environmental Report.

### **Issue no. 2**

The submission notes that the Tobercurry to Gorteen road was badly affected by flooding in 2015. P. Burke has concerns in relation to the Strategic Flood Risk Assessment and the measures that are proposed to prevent flooding.

#### **Opinion**

The specific problem referred to above relates to the rise and fall of water levels of a turlough located on private-owned lands adjacent to the R-294. Sligo County Council carried out some works in this area in 2016 to reduce the risk and extent of flooding. Due to the presence of a residential property within the flooding zone, further works are not possible.

It should be noted that this flood event was as a result of extreme weather events during December 2015 and January 2016 (reported as a one-in-500 years event). Such an event may never be seen again. Procedures have been put in place by the Roads Department of Sligo County Council to reduce the impacts of any future road closure on motorists, emergency services and the general public.

#### **Recommendation**

No change to the Draft Plan and Environmental Report.

### **Issue no. 3**

Inspector Burke indicates that the introduction of CCTV/ANPR cameras “in all major towns” would be of great benefit.

#### **Opinion**

The installation of CCTV cameras is an operational matter for the Gardai or the Local Authority, outside the remit of a County Development Plan.

#### **Recommendation**

No change to the Draft Plan and Environmental Report.

Anne Marie Finnerty  
on behalf of Skreen & Dromard Community Council

**Issue no. 1**

The members of Skreen & Dromard Community Council express their concerns and objections to the “*Planning Regulations and Restrictions which are in place to the building of Rural Housing, putting a blanket ban on building houses*”.

While indicating that “*nobody wants indiscriminate building or ruining our scenic area, there has to be a compromise where locals are allowed to build in their local community*”.

It is requested that restrictions be lifted and that “*sensible planning laws put into place*”.

The submission also provides demographic data showing that the population of the area has generally decreased since 2002 and has become older on average.

**Opinion**

It is presumed that the members of Skreen & Dromard Community Council refer to restrictions set out in the County Development Plan, not in the Planning Regulations.

In the current and previous County Development Plans (2011-2017 and 2005-2011), locals have been and continue to be facilitated to build a family home in the area where they grew up. The Draft Plan maintains these provisions.

The restrictions mentioned in the submission relate to the rural housing policies and the policies regarding development along scenic routes, sensitive landscapes and visually vulnerable areas.

The area of Skreen-Dromard is currently covered by two types of housing policy:

- housing policy for *rural areas under urban influence* (the eastern part, closer to Sligo);
- housing policy for *rural areas in need of regeneration*.

Neither the existing CDP 2011-2017, nor the Draft CDP 2017-2023 impose a blanket ban on rural housing in the area.

In accordance with the National Spatial Strategy and the Sustainable Rural Housing Guidelines, the Draft Plan accommodates proposals for one-off rural houses in *rural areas in need of regeneration*, subject to compliance with normal planning considerations, regardless of the provenance or personal circumstances of the applicants.

Applicants wishing to build a house within the portion designated as *rural area under urban influence* are required to demonstrate a rural housing need. The Draft Plan facilitates five categories of applicants (see box on the next page). It is proposed to amend the policy by removing spatial and temporal constraints (text shown in red; additions are shown in blue).

## Housing policy in Rural Areas Under Urban Influence

It is the policy of Sligo County Council to:

**P-RAUI-HOU-1** Accommodate proposals for one-off rural houses in **Rural Areas Under Urban Influence**, subject to normal planning considerations, including Habitats Directive Assessment and compliance with the guidance set out in **Section 13.4 Residential development in rural areas** (development management standards), where a housing need is demonstrated by the following categories of applicants:

- A. landowners, including their sons and daughters, who wish to build a first home for their permanent occupation on the landholding associated with their principal family residence ~~where they have lived for a minimum period of seven years;~~
- B. persons whose primary employment is in a rural-based activity with a demonstrated genuine need to live in the locality of that employment base, for example, those working in agriculture, aquaculture, forestry, horticulture or other natural resource-based employment ~~and who can demonstrate that they have been engaged in this employment for over five years;~~
- C. persons who have no family lands but who wish to build their first home for their permanent occupation in the area, ~~on a site within a 5 km radius~~ of their original family home, within the rural community in which they have spent a substantial and continuous part of their lives (this provision does not apply in cases where the original family home is located in an area zoned for development in a town or a village);
- D. persons with a link to the rural community in which they wish to build a first home for their permanent occupation, by reason of having lived in this community ~~for a minimum period of seven years~~ or by the existence in this community of long-established ties with immediate family members;
- E. persons who are required to live in a rural area for exceptional reasons, including health reasons. Such applications must be accompanied by a specialist's report and recommendation outlining the reasons why it is necessary for the applicant to live in a rural area. The application should also be supported by a relevant disability organisation of which the applicant is a member, where applicable.

and where such persons can demonstrate that the home they propose is in the interests of the proper planning and sustainable development of the area.

The western portion of the Skreen-Dromard area, which is designated as a *rural area in need of regeneration*, is crossed by the N-59 and the local road L-2302, which offer some of the best views in the County towards Knocknarea and Ben Bulbin, over Sligo Bay, and towards the Ox Mountains. There are several other, smaller scenic local roads. These roads have been designated as scenic routes for the past 17 years, since the adoption of the County Development Plan 1999-2004.

New houses along scenic routes have continued to be permitted and built since 1999, where the applicants could prove that they needed or were required to live in the area, or had no other sites available on family lands.

The Draft Plan continues this policy, as seen in the box below:

**Housing policy in green belts and sensitive areas**  
**(Scenic Routes, Sensitive Rural Landscapes, Visually Vulnerable Areas)**

It is the policy of Sligo County Council to:

**P-GBSA-HOU-1** Accommodate proposals for one-off rural houses in the green belts and sensitive areas, subject to normal planning considerations including Habitats Directive Assessment and compliance with the guidance set out in **Section 13.4 Residential development in rural areas** (development management standards), where a housing need is demonstrated by the following categories of applicants:

- A.** landowners, including their sons and daughters, who wish to build a first home for their permanent occupation on the landholding associated with their principal family residence ~~where they have lived for a minimum period of seven years;~~
- B.** persons whose primary employment is in a rural-based activity with a demonstrated genuine need to live in the locality of that employment base, for example, those working in agriculture, aquaculture, forestry, horticulture or other natural resource-based employment ~~and who can demonstrate that they have been engaged in this employment for over five years.~~

and where such persons can demonstrate that the home they propose is in the interests of the proper planning and sustainable development of the area.

Contrary to the claim of “blanket ban”, a total of **83 permissions were granted** since 2006 in the six electoral Divisions mentioned in this submission. Had all these houses been built and occupied, there would be at least 215 new residents in the area, considering an average household size of 2.6 (as per Census 2011). *[For details regarding planning applications for one-off houses from 2006 to 2016, see Note 1 on the next page]*

In reality, there is a substantial vacant housing stock in the six EDs, according to the preliminary results of Census 2016. There are **111 vacant units**, of which only 45 are considered to be holiday homes. *[For details regarding the housing stock in the 6 EDs, please see Note 3 on the following pages]*

Demographic data shows that in certain EDs the population decreased, despite the growing number of houses and planning permission granted for further houses.

It is considered that the main reason for this paradoxical phenomenon is the low availability of suitable local employment opportunities for young people, who are obliged to seek jobs outside County Sligo. The situation will not change until the local economy becomes stronger and more capable of offering sufficient jobs to an ever better qualified young generation.

## **Recommendation**

No change to the Draft Plan and Environmental Report on foot of this submission.

## **Note 1**

### **Planning applications for single houses in the combined areas of the six EDs of Aughris, Dromard East, Dromard West, Skreen, Toberpatrick East, Toberpatrick West, 2006 to 2016**

- The total number of applications received between 2006 and 2016 was 105
- Sligo County Council granted permission for 83 applications, of which two were refused by ABP on appeal.
- There were six applications refused, of which four reapplied and received permission.
- 16 applications were withdrawn, of which 11 reapplied and received permission.
- 1 invalid application was resubmitted and received permission.
- For all granted applications, there were 36 commencement notices received, while six commenced without notice.
- Of all granted applications, 13 expired and four received an extension of duration.

## **Note 2**

### **Pre-planning consultations from 2010 to 2016**

A number of 36 pre-planning files for one-off houses in the combined areas of the six EDs were examined. The respective pre-planning consultations took place between the years of 2010 and 2016.

- Of the 36 proposals, 26 received positive assessments.
- In six cases there were negative assessments. Four of these were due to landscape concerns, one was a person wishing to build a house to sell in a *rural area under urban influence* and the last one was due to traffic safety concerns.
- A further three proposals were undetermined (rural housing need was not established at the time of consultation and there was no follow-up by the prospective applicants).
- One proposal was for a mobile home and the assessment was negative.

## Note 3

Census 2016 preliminary results indicate that the total housing stock in the combined areas of the six EDs is 589 units. There were 478 occupied houses and 111 vacant houses, of which 45 are considered to be holiday homes. This leaves 66 habitable houses which are not occupied. The table below shows a breakdown of these figures by Electoral Division.

### Housing stock in the 6 EDs – Census 2016 preliminary results

Electoral Division		Census 2016
<b>017 Aughris</b>	Housing Stock	93
	Vacant holiday homes	15
	Other vacant dwellings	10
	<b>Total vacant dwellings</b>	<b>25</b>
	<b>Vacancy Rate (%)</b>	<b>26.9%</b>
<b>021 Dromard East</b>	Housing Stock	97
	Vacant holiday homes	7
	Other vacant dwellings	9
	<b>Total vacant dwellings</b>	<b>16</b>
	<b>Vacancy Rate (%)</b>	<b>16.5%</b>
<b>022 Dromard West</b>	Housing Stock	78
	Vacant holiday homes	2
	Other vacant dwellings	7
	<b>Total vacant dwellings</b>	<b>9</b>
	<b>Vacancy Rate (%)</b>	<b>11.5%</b>
<b>029 Skreen</b>	Housing Stock	81
	Vacant holiday homes	1
	Other vacant dwellings	14
	<b>Total vacant dwellings</b>	<b>15</b>
	<b>Vacancy Rate (%)</b>	<b>18.5%</b>
<b>032 Toberpatrick East</b>	Housing Stock	105
	Vacant holiday homes	14
	Other vacant dwellings	9
	<b>Total vacant dwellings</b>	<b>23</b>
	<b>Vacancy Rate (%)</b>	<b>21.9%</b>
<b>033 Toberpatrick West</b>	Housing Stock	135
	Vacant holiday homes	6
	Other vacant dwellings	17
	<b>Total vacant dwellings</b>	<b>23</b>
	<b>Vacancy Rate (%)</b>	<b>17%</b>





## Section III.

# Chief Executive's Supplementary Recommendations

## Chief Executive's Supplementary Recommendations (CESR) regarding modifications to **Chapter 5 Housing**

### Explanatory note

A recent decision of the European Court of Justice in Joined Cases C-197/11 and C-203/11 (*the 'Flemish Decree' Judgement*) are relevant to this matter relating to the compatibility with EU law of the requirement of a "serious link with the municipality" for access to real estate in some habitation zones in 69 municipalities in the Flemish Region of Belgium.

In this decision, the Court essentially found that a local needs type criteria in a Belgian building permit requirement was incompatible with Article 43 (freedom of movement of people) and Article 56 (freedom of movement of capital) of the EC Treaty.

The Planning Section of Sligo County Council understands that the Department of Housing and Planning is aware of the judgement and is engaging with the European Commission further to the receipt of a Letter of Formal Notice (an infringement notice) from the EU Commission dated 27 June 2007 (2007/4011) to Ireland under Article 226 of the EU Treaty regarding the "local needs assessment criteria" set out in the Department's *2005 Sustainable Rural Housing Guidelines*.

The planning Section of Sligo County Council understands that the Department has been examining the ruling with a view to identifying what elements of the existing *Sustainable Rural Housing Guidelines 2005* might need to be adapted or updated to ensure they are compatible with Articles 43 (freedom of movement of people) and 56 (freedom of movement of capital) of the EC Treaty.

In light of the foregoing, the Chief Executive recommends that Sligo County Council amends the rural housing policies contained in the Draft CDP 2017-2023 by removing the provisions that would conflict with Articles 43 (freedom of movement of people) and 56 (freedom of movement of capital) of the EC Treaty.

These provisions consist of temporal and spatial constraints applying in Rural Areas under Urban influence, such as the requirement for applicants to have lived for 7 years or worked for 5 years in a specific rural area to qualify for one-off rural housing, and the 5-km limit for the distance between an applicant's family home and the application site.

The removal of the above constraints would ensure that there is no discrimination between "local" and "non-local" applicants (such as those who originate in other EU Member States).

The main criterion for assessing application for single houses in rural areas will be the suitability of the proposed development in the context of the broader and long-term proper planning and sustainable development of the area.

## **CESR 5-1**

In **Section 5.3 Housing in rural areas**, modify the text of section **5.3.1 Rural housing policy areas** as follows:

### 5.3.1 Rural housing policy areas

**In Rural Areas in Need of Regeneration**, the Planning Authority will facilitate one-off housing without requiring applicants to demonstrate a housing need. Persons living and working in either rural or urban areas, who seek to build a house, will generally be accommodated in these areas, [subject to normal planning considerations \(refer to Section 13.4 for details on normal planning considerations\)](#). *[See the Chief Executive's Supplementary Recommendations regarding modifications to Chapter 13]*

**In Rural Areas under Urban Influence**, the Planning Authority will accommodate those applicants with a **rural-generated housing need** – which is a demonstrated, genuine need to live in the respective rural areas – [subject to normal planning considerations](#).

In all rural areas, certain restrictions will apply in designated settlement green belts, along Scenic Routes, in Sensitive Rural Landscapes and in Visually Vulnerable Areas (for details on these designations, refer to **Section 7.4 Landscape character**).

[The main criterion for assessing application for single houses in all rural areas will be the suitability of the proposed development in the context of the broader and long-term proper planning and sustainable development of the area.](#)

## **Housing policy in Rural Areas In Need Of Regeneration**

It is the policy of Sligo County Council to:

**P-RANR-HOU-1** Accommodate proposals for one-off rural houses in **Rural Areas In Need Of Regeneration**, subject to normal planning considerations, including Habitats Directive Assessment and compliance with the guidance set out in **Section 13.4 Residential development in rural areas** (development management standards).

## CESR 5-2

In Section 5.3 Housing in rural areas, modify the text of the subsection on **Housing policy in Rural Areas under Urban Influence** as follows:

### Housing policy in Rural Areas Under Urban Influence

It is the policy of Sligo County Council to:

**P-RAUI-HOU-1** Accommodate proposals for one-off rural houses in **Rural Areas Under Urban Influence**, subject to normal planning considerations, including Habitats Directive Assessment and compliance with the guidance set out in **Section 13.4 Residential development in rural areas** (development management standards), where a housing need is demonstrated by the following categories of applicants:

- A. landowners, including their sons and daughters, who wish to build a first home for their permanent occupation on the landholding associated with their principal family residence ~~where they have lived for a minimum period of seven years;~~
- B. persons whose primary employment is in a rural-based activity with a demonstrated genuine need to live in the locality of that employment base, for example, those working in agriculture, aquaculture, forestry, horticulture or other natural resource-based employment ~~and who can demonstrate that they have been engaged in this employment for over five years;~~
- C. persons who have no family lands but who wish to build their first home for their permanent occupation in the area, ~~on a site within a 5 km radius~~ of their original family home, within the rural community in which they have spent a substantial and continuous part of their lives (this provision does not apply in cases where the original family home is located in an area zoned for development in a town or a village);
- D. persons with a link to the rural community in which they wish to build a first home for their permanent occupation, by reason of having lived in this community ~~for a minimum period of seven years~~ or by the existence in this community of long-established ties with immediate family members;
- E. persons who are required to live in a rural area for exceptional reasons, including health reasons. Such applications must be accompanied by a specialist's report and recommendation outlining the reasons why it is necessary for the applicant to live in a rural area. The application should also be supported by a relevant disability organisation of which the applicant is a member, where applicable.

~~and where such persons can demonstrate that the home they propose is in the interests of the proper planning and sustainable development of the area.~~

### **CESR 5-3**

In **Section 5.3 Housing in rural areas**, modify the text of the subsection on **Housing policy in green belts and sensitive landscapes** as follows:

#### **Housing policy in green belts and sensitive areas (Scenic Routes, Sensitive Rural Landscapes, Visually Vulnerable Areas)**

It is the policy of Sligo County Council to:

**P-GBSA-HOU-1** Accommodate proposals for one-off rural houses in the green belts and sensitive areas, subject to normal planning considerations including Habitats Directive Assessment and compliance with the guidance set out in **Section 13.4 Residential development in rural areas** (development management standards), where a housing need is demonstrated by the following categories of applicants:

- A.** landowners, including their sons and daughters, who wish to build a first home for their permanent occupation on the landholding associated with their principal family residence ~~where they have lived for a minimum period of seven years;~~
- B.** persons whose primary employment is in a rural-based activity with a demonstrated genuine need to live in the locality of that employment base, for example, those working in agriculture, aquaculture, forestry, horticulture or other natural resource-based employment ~~and who can demonstrate that they have been engaged in this employment for over five years;~~

and where such persons can demonstrate that the home they propose is in the interests of the proper planning and sustainable development of the area.

# Chief Executive's Supplementary Recommendations (CESR) regarding modifications to **Chapter 6 Community facilities**

## **CESR 6-1**

In **Section 6.4 Arts and cultural facilities** (p. 90 of the Draft Plan), modify the text as follows:

### 6.4 Arts and cultural facilities

Sligo County Council supports and promotes opportunities for everyone to participate in the cultural life of the county by facilitating the provision of well-managed, sustainable cultural infrastructure, suitable for all ages, and by adopting a flexible approach to the incorporation of cultural facilities in the development or refurbishment of community facilities.

Public art is commissioned and co-ordinated by the Public Art Officer (Sligo Arts Service) and carried out in line with the Council's public art policy. Commissions are funded through the government-supported *Percent For Art* scheme.

#### **Libraries**

Sligo County Council currently operates a central library in Sligo town, two community libraries, one part-time branch library, a mobile library, as well as a County Museum and County Archive service. These services play an important role in connecting and empowering communities.

The library service in County Sligo is undergoing a major change in the delivery of its core services as envisioned in the DHPCLG's policy document *Opportunities for All: Catalyst for Economic, Social, and Cultural Development – a Strategy for Public Libraries 2013 -2017*.

Public libraries in County Sligo are being upgraded as fully accessible, neutral spaces, with a view to facilitating communities to avail of arts, business and cultural activities and services.

Sligo County Council's *Library Services Development Plan 2017–2022* charts the future direction of Sligo's library service through strategies which aim to meet the demands of the evolving economic and community profile of the county.

## **CESR 6-2**

In **Section 6.4**, subsection **Arts and cultural facilities policies**, add the following policies:

- P-AC-3** Support the improvement of library facilities and services, particularly in those communities which have undergone rapid increases in population or designated for future development.
- P-AC-4** Support the delivery of the objectives and actions set out in the Sligo Library Service Plan 2017-2022 in providing community-based educational, cultural and lifelong learning centres.

### **CESR 6-3**

In **Section 6.7.4 Outdoor recreational amenities** (p. 94 of the Draft CDP), add the following text and table under the heading **Public rights of way**:

#### 6.7.4 Outdoor Recreational Amenities

##### Public rights of way

Public rights of way constitute an important recreational amenity for local people and visitors. They enable the enjoyment of landscape, natural and archaeological heritage, and provide links to valuable assets such as lakes, mountains, bogs and forests. A public right of way is a person's right of passage, established by usage or grant, along a road or path, even if the route is not in public ownership.

The Council recognises the importance of protecting existing public rights of way and will pursue the creation of additional ones, by agreement with landowners, to facilitate the development of walking trails in areas of high amenity value.

A public right of way will only be included in the Development Plan when the following criteria have been satisfied:

- There must be actual dedication by the landowner to the public use of the route in question or there must be sufficient evidence to show that such a dedication was intended;
- A public right of way must be open to the public and not just a class of persons or limited number of the public;
- A public right of way must start in and finish in a public area (i.e. it cannot terminate in private property);
- A public right of way cannot be obtained by stealth, by force or by licence i.e. it must be a route to which the public have a right of access as a right not by way of permission.

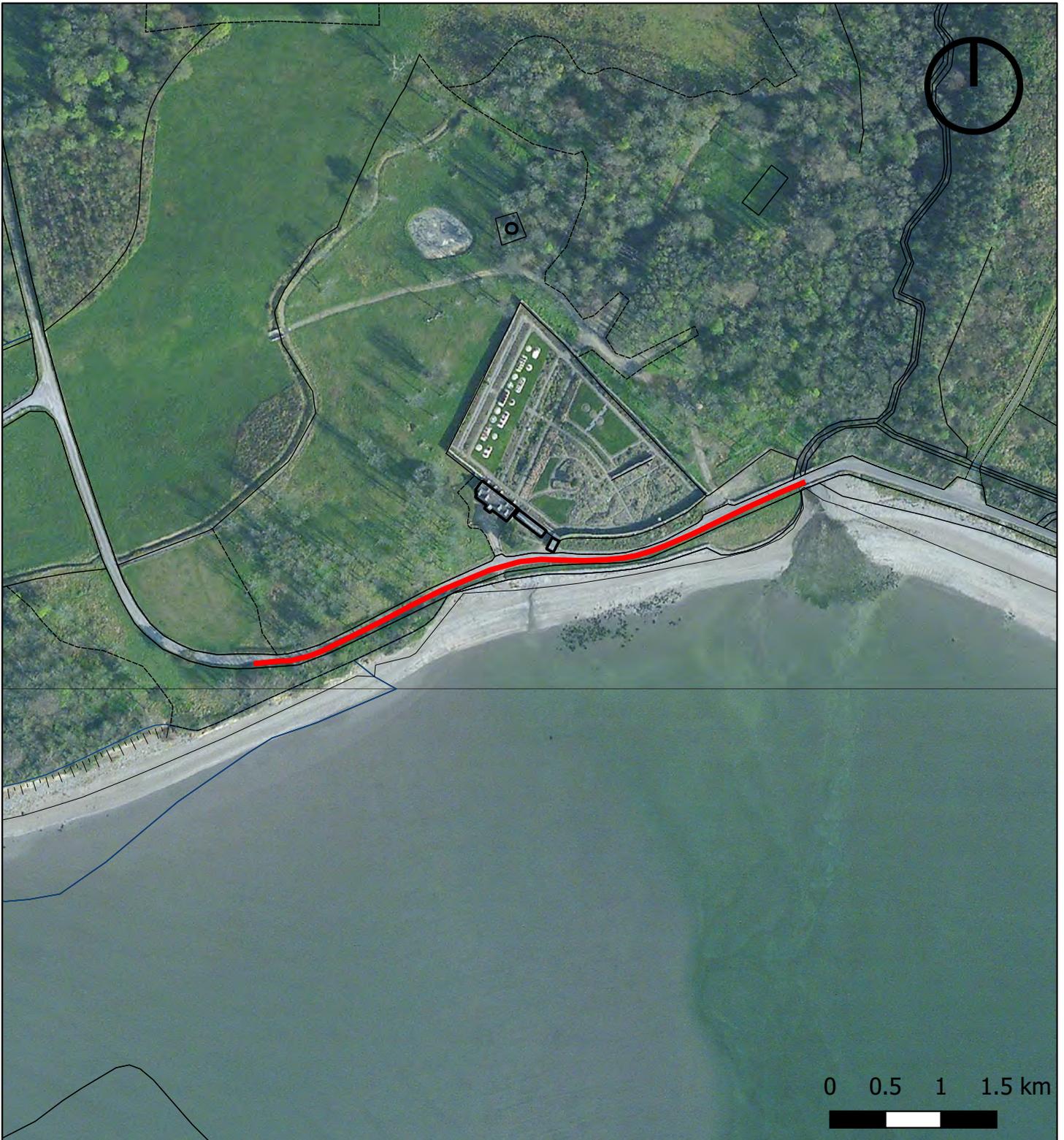
The Council has identified six routes which are considered to fulfil the above criteria. These routes are listed in Table 6.A below and shown on a set of maps grouped in Appendix J.

**Table 6.A – Public Rights of Way within County Sligo** (*Note: see maps at the end of this section*)

<b>Reference no.</b>	<b>Location</b>	<b>Description</b>
<b>PROW 1</b>	Lissadell	From the centre of the Bunbrennoige Bridge for a distance of 263 m west to the point where the former Lissadell House was situated along the coast
<b>PROW 2</b>	Ballysadare	Quarry walk from the existing road to the foreshore and Abbey
<b>PROW 3</b>	Rosses Point	From the public car park to the second beach
<b>PROW 4</b>	Enniscrone	Walk north from the Pier along the seashore, exiting 870 m north onto L-66018
<b>PROW 5</b>	Trawane Bay	From the road L-60043 to the shoreline of Trawane Bay
<b>PROW 6</b>	Mullaghmore / Cliffony	From the R-297 to the beach at Trawalua

It is important to note that this list is not an exhaustive. The omission of a right of way from this list shall not be taken as an indication that such a right of way is not a public right of way.

Over the life of this plan, the Council will endeavour to add to this list where it has been established that the above criteria have been satisfied and having consulted with the communities and landowners involved.



**PROW 1**  
**Public right of way**  
**number 1 at Lissadill**



**Notes:**

Details shown on this map are for information purposes only. Further details on any item should be clarified with Sligo County Council.

This map has been produced by Sligo County Council with available Local Authority and Ordnance Survey Ireland base data.

It is important to note that this is not an exhaustive list and that the omission of a Right of Way from this list shall not be taken as an indication that such a Right of Way is not a Public Right of Way.

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**PROW 2**  
**Public right of way**  
**number 2 at**  
**Ballysadare**



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**PROW 3**  
**Public right of way**  
**number 3 at Rosses**  
**Point**



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**PROW 4**  
**Public right of way**  
**number 4 at**  
**Enniscrone**



Notes:

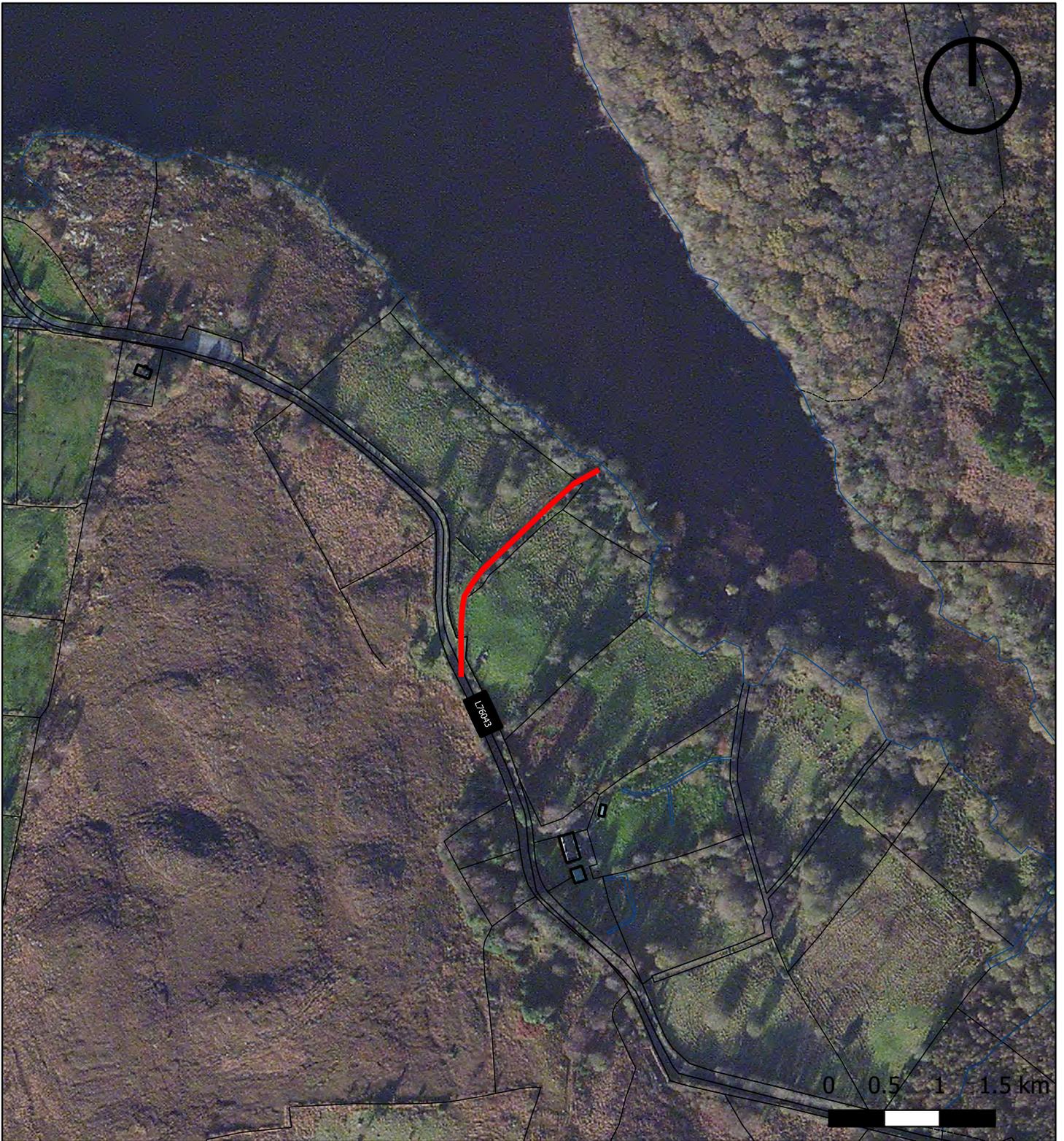
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**PROW 5**  
**Public right of way**  
**number 5 at Trawane**  
**Bay**



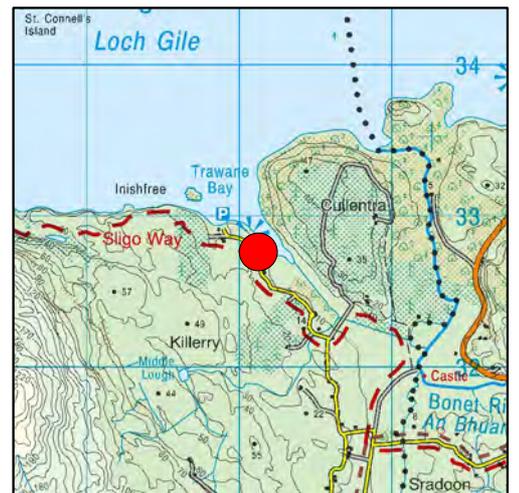
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**PROW 6**  
**Public right of way**  
**number 6 at Trawalua**  
**Strand**



**Notes:**

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# Chief Executive’s Supplementary Recommendations (CESR) regarding modifications to **Chapter 7 Heritage**

## **CESR 7-1**

In **Section 7.4 Landscape character, subsection 7.4.3 Current knowledge and policy** (p. 124 of the Draft CDP), make the following changes:

The LC Map classifies the County according to its visual sensitivity and capacity to absorb new development without compromising the scenic character of certain areas. It designates the following:

- **Normal Rural Landscapes:** areas with natural features (e.g. topography, vegetation) which generally have the capacity to absorb a wide range of new development forms – these are ~~the main~~ largely farming areas and cover most of the County. ~~At the same time, certain areas located within normal rural landscapes may have superior visual qualities, due to their specific topography, vegetation pattern, the presence of traditional farming or residential structures. These areas may have limited capacity for development or may be able to absorb new development only if it is designed to integrate seamlessly with the existing environment.~~
- **Sensitive Rural Landscapes** ..... *(no change)*
- **Visually Vulnerable Areas** ..... *(no change)*
- **Scenic Routes:** public roads passing through or close to Sensitive Rural Landscapes, or in the vicinity of Visually Vulnerable Areas, and affording unique scenic views of distinctive natural features or vast open landscapes. ~~In addition to remote views, scenic routes have often a distinctive visual character conferred by old road boundaries, such as stone walls, established hedgerows, lines of mature trees, adjoining cottages or farmyards together with their traditional, planted enclosures etc., all of which warrant protection.~~

## **CESR 7-2**

In subsection **Landscape character assessment and protection policies** (p. 125 of the Draft CDP), amend policy **P-LCAP-1** as follows:

- P-LCAP-1** Protect the physical landscape, visual and scenic character of County Sligo and seek to preserve the County’s landscape character. ~~by assessing all development proposals on the basis of the Landscape Characterisation Map.~~

Planning applications that have the potential to impact significantly and adversely upon landscape character, ~~or scenic views~~ especially in *Sensitive Rural Landscapes, Visually Vulnerable Areas and along Scenic routes*, may be required to be accompanied by a visual impact assessment using agreed and appropriate viewing points and methods of assessment.

### **CESR 7-3**

In subsection Landscape character assessment and protection policies (p. 125 of the Draft CDP), amend policy P-LCAP-3 as follows:

- P-LCAP-3** Preserve the scenic views listed in **Appendix F** and the distinctive visual character of designated *Scenic Routes* by controlling development along ~~designated Scenic~~ such Routes and other roads, while facilitating developments that may be tied to a specific location or to the demonstrated needs of applicants to reside in a particular area.

In all cases, strict location, siting and design criteria shall apply, as set out in **Section 13.4 Residential development in rural areas** (development management standards).

## Chief Executive's Supplementary Recommendations (CESR) regarding modifications to **Chapter 8 Transport and mobility**

### **CESR 8-1**

In **Chapter 8 Transport and mobility**, subsection **National roads objectives** (p. 133 of the Draft CDP), delete objective O-NR-3:

~~**O-NR-3** — Maintain the national road bridge stock subject to compliance with the Habitats Directive.~~

### **CESR 8-2**

In **Chapter 8 Transport and mobility**, subsection **Non-national roads and bridges policies** (p. 135 of the Draft CDP), add the following policy:

- P-NNR-5** Upgrade roads, footpaths, car-parking areas and junctions within the County's towns and villages in accordance with the provisions of the Design Manual for Urban Roads and Streets (DTTS, DECLG, 2013), subject to the availability of resources.

# Chief Executive's Supplementary Recommendations (CESR) regarding modifications to **Chapter 10 Environmental quality**

## **CESR 10-1**

Modify **Section 10.4 Coastal environment** (p.172 of the Draft Plan) as follows (deletions in ~~red~~, additions in **blue**):

Increasingly, the coastal zone is coming under pressure from, for example:

- individuals seeking to build houses in scenic locations;
- tourism providers who may seek to exploit scenic views in the provision of accommodation or other facilities;
- mariculture developments;
- coastal protection works;
- wind farm operators who wish to avail of **exposed** coastal locations ~~with high wind speeds~~;

## **CESR 10-2**

Modify **Section 10.4.1 Coastal zone** (p.172 of the Draft Plan) as follows:

For the purposes of this Development Plan, the coastal zone refers to the area between the **High Water Mark and the nearest scenic route or other** continuous road **parallel to the coast** ~~and the High Water Mark~~. However, the natural coastal systems and the areas in which human activities involve the use of coastal resources may extend **both** beyond such roads, many kilometres inland, **and into the sea**.

## **CESR 10-3**

In **Section 10.4.4 Developments on the foreshore and nearshore** (p. 173 of the Draft Plan) replace the text in ~~red~~ with the text in **blue** below:

~~The foreshore is defined as the area below the high water mark of ordinary or medium tides to the 12 nautical mile limit.~~

The foreshore of Ireland is classed as the land and seabed between the high water of ordinary or medium tides (shown HWM on Ordnance Survey maps) and the twelve-mile limit (12 nautical miles equals approximately 22.24 kilometers). The foreshore also covers tidal areas of rivers particularly estuaries.

## **CESR 10-4**

Modify **Section 10.4.5 Coastal Flooding and erosion** (p. 174 of the Draft Plan) as follows:

The storms that occurred ranged in severity from one-in-three-year to one-in-~~150~~-250-years events. These storms could be driven by climate change or could be a consequence of a rare climatic event.

### **CESR 10-5**

In **Box 10.A Proposed coastal protection works** (p. 176 of the Draft Plan,) modify the second row as follows:

<b>Location</b>	<b>Proposed works</b>
<b>Pullaheeny</b>	Coastal <b>and river outfall</b> protection

### **CESR 10-6**

In **Section 10.4.6 Coastal Protection**, modify policy **P-CP-2** (p. 176 of the Draft Plan) as follows:

- P-CP-2** Require that any development within the coastal zone is appropriately sited **and designed** having regard to coastal flooding, future shoreline erosion, predicted sea level rise and OPW flood mapping.

### **CESR 10-7**

Modify **Section 10.6.3 Role of the Local Authority** (p. 180-181) by inserting the following text (**in blue**):

Having regard to current national policy and planning legislation, this Development Plan seeks to increase County Sligo's resilience to climate change by promoting sustainable development in general and through appropriate policies in relation to:

.....

- protection of wetlands, water bodies, forests, wildlife habitats, biodiversity, areas of natural heritage importance, natural features and green spaces in general (refer to Sections 7.1 Natural heritage, 10.1 Water quality and 10.4 Coastal environment).
- flood risk assessment and management, and protection against coastal flooding and erosion (refer to Section 10.4 Coastal environment and 10.7 Flood Risk Management).
- **the repair of old bridges rather than their complete replacement, thereby enhancing the cultural and industrial heritage of the county and reducing the carbon footprint.**

### **CESR 10-8**

In **Section 10.6 Climate change**, subsection Climate adaptation and mitigation policies (p. 182 of the Draft Plan), insert the following additional policy:

- P-CAM-11** **Support the repair rather than the replacement of old structures, where possible, in particular the repair of the stone arch bridge stock in preference to replacement (with high carbon materials).**

### **CESR 10-9**

Modify **Section 10.7 Flood Risk Management** (p. 183 of the Draft Plan) as follows:

Flooding from rivers and coastal waters is a natural phenomenon that cannot be entirely prevented. It occurs when the capacity of a watercourse to convey water through an area is exceeded. Flooding also

occurs in coastal areas, when sea water encroaches on land due to failure of coastal defences, exceptional climatic phenomena or other factors.

Probably the best known is flooding from the sea, [surcharged aquifers](#) and ~~from~~ rivers, but prolonged and intense rainfall can also cause flooding from overland flow, ponding in hollows and sewer flooding.

It is likely that climate change will have a significant impact on flood risk in Ireland, through sea level rise, increased number of heavy rainfall days per year and wetter winters, particularly in the west of the country, leading to higher groundwater flood risk associated with [aquifers and](#) turloughs.

These potential impacts could have serious consequences on settlements located on the coast, ~~or~~ beside rivers [and in karst limestone areas](#). The man-made environment can exacerbate the consequences of flooding. Development in a flood plain, or building in areas where drainage infrastructure is inadequate, places property and people at risk. Flooding may impact on the economy, social well-being, public health and the environment. The impact on individuals and communities can be significant in terms of personal suffering and financial loss.

## **CESR 10-10**

Modify **Section 10.7.2 Progress in flood risk assessment**, page 184 as follows:

~~Of these, eight went forward in the process for further assessment and modelling – Sligo Town, Rathbraughan, Collooney, Riverstown, Ballymote, Gorteen, Coolaney and Ballysadare. Flood mapping (Zones A and B) has been produced for these areas (albeit in draft form and not yet in the public domain).~~

~~Only three of the above areas were deemed significant enough to require flood risk management plans – Coolaney, Sligo Town and Rathbraughan. At the time of writing (summer 2016), public consultation on the Draft Flood Risk Management Plan (FRMP) for the Sligo Bay Drowes Unit of Management (UoM 35) had not yet started.~~

Of these, eight Areas for Further Assessment (AFAs) went forward in the process for further assessment and modelling – Sligo Town, Rathbraughan, Collooney, Riverstown, Ballymote, Gorteen, Coolaney and Ballysadare. Flood mapping (Zones A and B) has been produced for these areas.

Following the assessment and modelling of the AFAs, a Flood Risk Management Plan (FRMP) for the Sligo Bay Drowes Unit, which is known as Unit of Management 35 (UoM 35), was prepared in draft form. Areas of Sligo also extend into UoM 34 (the Moy catchment) and UoM 36 (the Duff catchment).

The Draft FRMP sets out the proposed strategy, actions and measures that are considered to be the most appropriate at this stage of assessment for the eight AFAs. The Draft FRMP is based on detailed modelling and appraisal of possible options for the flood risk management measures.

The OPW is in the process of completing the statutory procedure for adopting the FRMPs. Public consultation on the Draft FRMPs was held in the last quarter of 2016. Sligo County Council submitted a number of comments and observations. The final FRMPs will be published in mid-2017, along with a report detailing all submissions received.

The final FRMP for the County is expected to indicate flood risk management measures based on a national list of prioritised measures across all FRMPs.

# Chief Executive's Supplementary Recommendations (CESR) regarding modifications to **Chapter 13 Development standards**

## **CESR 13-1**

Modify **Section 13.4 Residential development in rural areas** (p. 230 of the Draft CDP) as follows:

### 13.4 Residential development in rural areas

New development in rural areas should be absorbed and integrated successfully into the rural setting, i.e. development should harmonise or 'read' with the existing traditional pattern of development and not intrude on unspoilt landscapes.

The Council will ~~require new~~ **accept either** houses ~~to be~~ designed according to traditional or vernacular principles, ~~while accepting or~~ **houses of** high-quality, modern design, where suitable. "Suburban"-style houses ~~design~~ in rural areas ~~will be discouraged.~~ **is not acceptable.**

All applications will be assessed on the basis of normal planning considerations.

#### **Normal planning considerations**

The "normal planning and sustainable development considerations" used in assessing planning applications include the following criteria:

- How the proposal relates to the Core Strategy, general policies and specific objectives of the County Development Plan;
- Whether there are any archaeological or other heritage factors involved;
- Whether the site is in a sensitive area, e.g. adjoining a scenic road, located in a sensitive rural landscape, in a visually vulnerable area, in a coastal zone or in a known flood risk zone;
- Whether the site is in an exposed location where the proposed development would be visually obtrusive;
- The settlement pattern of the area and the potential for overdevelopment or ribbon development;
- Whether the siting, design and scale of the proposed structure are appropriate to the surrounding natural and built environment;
- Whether the proposed site entrance is on a dangerous or high-speed stretch of road;
- Whether a large number of mature trees or an excessive length of roadside hedgerow need to be removed to provide an entrance;
- Whether there are any sewage disposal, drainage or water supply concerns;
- Whether there are any pollution or other public safety concerns;
- Whether the proposed development would unduly affect other properties in the area (e.g. by overlooking or overshadowing)

The list of criteria given above is not exhaustive. Advice on specific development proposals can be obtained as part of pre-planning consultations offered daily at the County Council's planning office.

## **CESR 13-2**

Modify **Item B** of **Section 13.4.2 Site selection – locating a house in the landscape** (p. 230 of the Draft CDP) as follows:

### **B. Site location**

Those planning to build a house in the countryside should avoid elevated or exposed locations such as hill slopes, ridge lines or vast open landscapes where the new building would appear intrusive or break the skyline or the shoreline.

Instead of locating a house on an exposed site, the following types of site should be considered:

- sites that cluster with existing development (other houses, sheds or agricultural development such as traditional farm complexes);
- infill sites within existing ribbon development (in exceptional circumstances, sites at the end of ribbon development may be considered as an alternative to an exposed site);
- sites where the new house can “round off” scattered development.

The house should “nestle” into the site and not dominate the landscape or diminish the quality of scenic views of the surrounding countryside.

Sites should be sheltered, where possible, by topography and by established natural boundaries. Mature trees and hedgerows can offer shelter, screening or backdrop to new houses.

# Chief Executive's Supplementary Recommendations (CESR) regarding modifications to the **Strategic Flood Risk Assessment**

## **CESR SFRA-1**

In **Section 3.1.2 CFRAM programme** (p. 9 of the SFRA document), starting from the fifth paragraph, modify the text as follows (~~deletions in red~~, additions in blue):

~~Of these, eight went forward in the process for further assessment and modelling – Sligo Town, Rathbraughan, Collooney, Riverstown, Ballymote, Gorteen, Coolaney and Ballysadare. Flood mapping (Zones A and B) has been produced for these areas (albeit in draft form and not yet in the public domain).~~

~~Only three of the above areas were deemed significant enough to require flood risk management plans – Coolaney, Sligo Town and Rathbraughan. At the time of writing (summer 2016), public consultation on the Draft Flood Risk Management Plan (FRMP) for the Sligo Bay Drowes Unit of Management (UoM 35) had not yet started.~~

Of these, eight Areas for Further Assessment (AFAs) went forward in the process for further assessment and modelling – Sligo Town, Rathbraughan, Collooney, Riverstown, Ballymote, Gorteen, Coolaney and Ballysadare. Flood mapping (Zones A and B) has been produced for these areas.

Following the assessment and modelling of the AFAs, a Flood Risk Management Plan (FRMP) for the Sligo Bay Drowes Unit, which is known as Unit of Management 35 (UoM 35), was prepared in draft form. Areas of Sligo also extend into UoM 34 (the Moy catchment) and UoM 36 (the Duff catchment).

The Draft FRMP sets out the proposed strategy, actions and measures that are considered to be the most appropriate at this stage of assessment for the eight AFAs. The Draft FRMP is based on detailed modelling and appraisal of possible options for the flood risk management measures.

The OPW is in the process of completing the statutory procedure for adopting the FRMPs. Public consultation on the Draft FRMPs was held in the last quarter of 2016. Sligo County Council submitted a number of comments and observations. The final FRMPs will be published in mid-2017, along with a report detailing all submissions received.

The final FRMP for the County is expected to indicate flood risk management measures based on a national list of prioritised measures across all FRMPs.

**Note:** the text of this proposed modification is identical to the one recommended under CESR 10-10 (modifications to Chapter 10 of the Draft CDP).

# Corrections to Volume 1

The following corrections to Volume 1 of the Draft Plan 2017-2023 are recommended by the Chief Executive:

- a. In **Chapter 3 Core Strategy, Section 3.1.3** RPG population targets and housing land allocations, correct the sixth paragraph as follows  
  
... the difference between the 2022 and the ~~2022~~ 2016 targets ...
  
- b. In **Chapter 8 Transport**:
  - In **Section 8.1.2 Provisions of the Regional Planning Guidelines** (p. 128 of the Draft CDP), correct the third paragraph as follows:  
  
... Priorities for this route are the N-17 ~~Tobercurry~~ Bellaghy to Collooney section ...
  - Modify the **Note** at the end of **Table 8.B National road projects** (p. 134 of the Draft CDP) as follows:  
  
\* Note: the timeframe for all projects is subject to TII approval [and available funding](#)
  
- c. Ensure that all maps of designated nature conservation sites (SACs, SPAs, NHAs) in **Appendix A** show the up-to-date boundaries of these sites.
  
- d. In **Chapter 12 Urban Design Policies**, correct Policy P-UD-5 (p. 205 of the Draft CDP) as follows:  
  
... Require the retention and restoration of ~~original~~ historic windows ...



## List of persons and organisations that made submissions or observations relating to the Draft CDP 2017-2023, Volumes 1 and 2

### Submissions received between 21 September 2016 and 30 November 2016

<b>Ref. No.</b>	<b>Date received</b>	<b>Name or Agency</b>	<b>on behalf of (where applicable)</b>	<b>Address</b>	<b>Volume</b>
<b>1</b>	21/09/16	<b>Francis Davitt</b>	<b>Davitt Plan &amp; Design</b>	Main Street, Drumkeerin, Co. Leitrim	<b>1</b>
<b>2</b>	02/10/16	<b>Patrick J. Scanlon</b>		3 Devon Gardens, Salthill, Galway	<b>2</b>
<b>3</b>	03/10/16	<b>Patrick Benson</b>	<b>CADRA</b>	Dublin Road, Carraroe, Sligo	<b>1</b>
<b>4</b>	06/10/16	<b>Damien Owens</b>	<b>Engineers Ireland</b>	e-mail	<b>1</b>
<b>5</b>	13/10/16	<b>Anthony Mc Garry</b>		1 Bramble Hollow, Collooney, Co. Sligo	<b>2</b>
<b>6</b>	13/10/16	<b>Grace Larkin</b>		Ard NaGlass, Grange, Co. Sligo	<b>1</b>
	14/10/16	<b>Tamlyn McHugh</b>		17 Cooldrumman Upr., Carney, Co. Sligo	<b>1</b>
	17/10/16	<b>Tamlyn McHugh, Chairperson</b>	<b>Friends of Sligo Gaol</b>	17 Cooldrumman Upr., Carney, Co. Sligo	<b>1</b>
	18/10/16	<b>Janet Benson</b>		68 Dorrins Strand, Strandhill, Co. Sligo	<b>1</b>
	18/10/16	<b>Steve Devine</b>		Ardcumber, Riverstown, Co. Sligo	<b>1</b>
	18/10/16	<b>Anna Marie Doherty</b>			<b>1</b>
	18/10/16	<b>Dr. Robert Hensey</b>		Lugnagal, Glencar, Co. Sligo	<b>1</b>
	18/10/16	<b>Iarlaithe O Tighearnaigh</b>		68 Dorrin's Strand, Strandhil, Co. Sligo	<b>1</b>
	19/10/16	<b>Nuala Dineen- Campbell</b>		'Inveraray', Oakfield Road, Sligo	<b>1</b>
	19/10/16	<b>John Dorrian</b>		29 Ardcairn, Cairns Road, Sligo	<b>1</b>
	19/10/16	<b>Pauline Foley</b>		Knockbeg, Collooney, Sligo	<b>1</b>
	19/10/16	<b>Deirdre Melvin</b>		2 Mayfield House, Maugherboy, Sligo	<b>1</b>
	19/10/16	<b>Niall O'Connor</b>		12 Greenfort, Sligo	<b>1</b>
19/10/16	<b>Eddie O'Gorman</b>		Grange, Co. Sligo	<b>1</b>	

	19/10/16	<b>Fintan Whelan</b>			<b>1</b>
	25/10/16	<b>Michael Devine</b>		Ardcumber, Riverstown, Co. Sligo	<b>1</b>
	04/11/16	<b>Deirdre Molloy</b>		14 Okeover manor, Clpham Common North Side, London	<b>1</b>
	08/11/16	<b>Clare Feerick</b>			<b>1</b>
	17/11/16	<b>Frank Reilly</b>			<b>1</b>
<b>7</b>	19/10/16	<b>John McCarrick</b>		e-mail	<b>1</b>
<b>8</b>	19/10/16	<b>Pat McCarrick, Chairperson</b>	<b>Sligo Greenway Co-op</b>	Carrowmore Old School, Lavagh, Co. Sligo	<b>1</b>
<b>9</b>	19/10/16	<b>Pat McCarrick</b>		Loughill, Lavagh, Ballymote, Co. Sligo.	<b>1</b>
<b>10</b>	19/10/16	<b>Pat McCarrick</b>		Moy River Bed & Breakfast, Cloonacool, Co. Sligo	<b>1</b>
<b>11</b>	25/10/16	<b>Joe Corcoran, Chairperson</b>	<b>Sligo Tourism Ltd.</b>	Aras Reddan, Temple Street, Sligo	<b>1</b>
<b>12</b>	08/11/16	<b>John Robinson</b>		'The Haven', Rosses Point, Co. Sligo	<b>2</b>
<b>13</b>	14/11/16	<b>Tara Spain, Head of Land Use Planning</b>	<b>Transport Infrastructure Ireland</b>	Parkgate Business Centre, Parkgate Street, Dublin 8	<b>1&amp;2</b>
<b>14</b>	15/11/16	<b>Frank Keane</b>	<b>Mrs. Margaret Keane</b>	16 Coill Dara, Tubbercurry, Co. Sligo	<b>2</b>
<b>15</b>	18/11/16	<b>John Fahy, Nolan and Quinlan</b>	<b>Virginia &amp; Pat Curran</b>	4 Constitutional Court, Stephen Street, Sligo	<b>2</b>
<b>16</b>	22/11/16 & 23/11/16	<b>Brendan Quinn</b>		2 Ocean View, Enniscrone, Co. Sligo	<b>1</b>
<b>17</b>	23/11/16	<b>Michael &amp; Mary McGoldrick</b>	<b>Mr. James McGoldrick</b>	"The Hideout", Culleenamore, Strandhill, Sligo	<b>2</b>
<b>18</b>	23/11/16	<b>David Rolston</b>	<b>Patrick &amp; Joe Rolston</b>	Aderavoher, Easkey, Co. Sligo	<b>2</b>
<b>19</b>	23/11/16	<b>Anne Ruane, Principal</b>	<b>Scoil Asicus Naofa</b>	Strandhill, Co. Sligo	<b>2</b>
<b>20</b>	24/11/16	<b>Liam McHugh</b>		Cliffoney, Co. Sligo	<b>2</b>
<b>21</b>	24/11/16	<b>Liam McHugh</b>		Cliffoney, Co. Sligo	<b>2</b>
<b>22</b>	24/11/16	<b>Patrick Gilmartin</b>		Newtownward, Grange, Co. Sligo	<b>2</b>
<b>23</b>	24/11/16	<b>Ross Gallagher &amp; Niamh McHugh</b>		Mullaghmore, Co. Sligo	<b>2</b>

<b>24</b>	25/11/16	<b>Brendan Quinn</b>		2 Ocean View, Enniscrone, Co. Sligo	<b>1</b>
<b>25</b>	25/11/16	<b>Adrian Tansey</b>		Campbell Court, Cairns Hill, Sligo	<b>2</b>
<b>26</b>	26/11/16	<b>John Mulligan</b>		Kiltycreighton, Boyle, Co. Roscommon	<b>1</b>
<b>27</b>	28/11/16	<b>Ann Mulcrone, Reid Associates</b>	<b>Daughters of Wisdom</b>	Chartered Town Planners, Planning and Development Consultants, 2 Connaught Place, Crofton Road, Dun Laoghaire, Co. Dublin	<b>1</b>
<b>28</b>	28/11/16	<b>George Draper</b>		Ballincar, Co. Sligo.	<b>2</b>
<b>29</b>	28/11/16	<b>John Giblin</b>		200 Tirellan Heights, Headford Road, Galway	<b>1</b>
<b>30</b>	28/11/16	<b>Joe Carty, Vincent Hannon Architects</b>	<b>Mr. Tony Gormley</b>	Abbey Street, Sligo	<b>2</b>
<b>31</b>	28/11/16	<b>Sean McCarthy, McCarthy Keville O'Sullivan</b>	<b>Mr. Bernard Gerard Henry</b>	Block 1, G.F.S.C. Moneenageisha Road, Galway	<b>2</b>
<b>32</b>	28/11/16	<b>Sean McCarthy, McCarthy Keville O'Sullivan</b>	<b>Kilcawley Construction Ltd.</b>	Block 1, G.F.S.C. Moneenageisha Road, Galway	<b>2</b>
<b>33</b>	28/11/16	<b>Raymond Lenehan</b>		Flat 1, C/o Westel, Curry, Ballymote, Co. Sligo	<b>2</b>
<b>34</b>	28/11/16	<b>Bernard Mullen Dr Joseph McKenna Patricia McKenna Donal Murray MQ Murray Raymond T. Monahan Eileen Monahan Frederick Mc Veigh Barbara Mc Veigh Sinead Mc Dermott James Feeney Leonard Noone George Draper Vivien Draper Geraldine Clarke Enda Scanlon Lelia East Colm Hannon Patrick Devaney Patrick Leigh Doyle Mary Leigh Doyle</b>		Ballincar, Co. Sligo	<b>2</b>
<b>35</b>	28/11/16	<b>Ronan and Maureen McCann</b>		3 Glenview Park, Grange, Co. Sligo	<b>1</b>
<b>36</b>	28/11/16	<b>Gail McGibbon, CEO</b>	<b>Sligo BID</b>	e-mail	<b>1</b>

37	28/11/16	<b>D. Harte, D.A. Harte &amp; Associates</b>	<b>P. Rattigan, B. Mullen, T. Porter &amp; M. Horan</b>	Surveyors Engineering & Planning Consultants, Rosses Point, Co. Sligo	<b>2</b>
38	28/11/16	<b>Colm McLoughlin, Mc Cutcheon Halley Chartered Consultants</b>	<b>RPC Construction</b>	McCutcheon Halley, Kreston House, Arran Court, Arran Quay, Dublin	<b>2</b>
39	28/11/16	<b>Martin Timoney</b>		Keash, Ballymote, Co. Sligo	<b>1 &amp; 2</b>
40	28/11/16	<b>Mary &amp; Martin Timoney</b>		Keash, Ballymote, Co. Sligo	<b>2</b>
41	29/11/16	<b>John Tierney, Associate Director</b>	<b>Aldi Stores Ireland Ltd.</b>	Newbridge Road, Naas, Co. Kildare	<b>1</b>
42	29/11/16	<b>Michael Kirby</b>	<b>An Taisce - North West Local Association</b>	e-mail	<b>1</b>
43	29/11/16	<b>Tony Bamford, Planning &amp; Development Consultants</b>		127 Lwr. Baggot Street, Dublin 2	<b>1</b>
44	29/11/16	<b>Jill Barber</b>		Drumcliffe Tea House & Craft Shop, Drumcliffe, Co. Sligo	<b>2</b>
45	29/11/16	<b>Eamon Barrett</b>		45 Carbry Coast, Tullaghan, Co. Leitrim	<b>2</b>
46	29/11/16	<b>Patrick Barrett, Duggan Barrett Consulting Engineers</b>	<b>DMG Promotions LTD</b>	Consulting Engineers Ltd., Teeling Street, Sligo.	<b>2</b>
47	29/11/16	<b>Jeremy &amp; Dorothy Bird</b>		Kildonagh House, Ballincar, Rosses Point, Sligo	<b>2</b>
48	29/11/16	<b>John &amp; Eimer Drumm</b>		Ballyclough, Limerick	<b>2</b>
49	29/11/16	<b>Yvonne Jackson</b>	<b>Fáilte Ireland</b>	88/95 Amiens Street, Dublin 1	<b>1</b>
50	29/11/16	<b>Jarlath Gantly, Chairperson</b>	<b>Sligo Cycling Campaign</b>	Drumcliffe Development Association, Urlar, Drumcliffe, Co. Sligo	<b>2</b>
51	29/11/16	<b>Jarleth Gantly, Eco Travel Ltd.</b>		Wild Atlantic Ways, Drumcliffe, Co. Sligo	<b>1</b>
52	29/11/16	<b>Niall Cussen, Principal Advisor, Forward Planning Section</b>	<b>Planning &amp; Housing Market Policy and Land Management Division, Department of Housing, Planning, Community and Local Government</b>	Custom House, Dublin 1	<b>1</b>
53	29/11/16	<b>Martin Gilroy</b>		Grange, Co. Sligo	<b>2</b>

54	29/11/16	Ronan Gilroy		Upperwood, Grange, Co. Sligo	2
55	29/11/16	Raymond T. Monaghan		Carroll House, 15/16 Stephen Street, Sligo	2
56	29/11/16	Tony McCaul		Carrowbunnaun, Strandhill, Co. Sligo	2
57	29/11/16	James McGoldrick		Jones, Carr & McGoldrick, Premier Place 5910 N. Central Expressway- Suite 1700, Dallas, Texas	2
58	29/11/16	Colm McLoughlin, Mc Cutcheon Halley Chartered Consultants	Mrs Eileen Carty	McCutcheon Halley, Kreston House, Arran Court, Arran Quay, Dublin	2
59	29/11/16	John O'Hara		John O'Hara & Associates, Doocastle, Ballymote, co. Sligo	1
60	29/11/16	Michael Rowley		Michael Rowley & Associates, Design, Planning & Project Management Consultants, Cloonfinish, Swinford, Co. Mayo	1
61	29/11/16	Heather Taylor, Chairperson	Parents and Guardians of Cregg Services	e-mail	1
62	29/11/16	Peter Bowen-Walsh		Main Street, Collooney, Co. Sligo	2
63	30/11/16	Albert Higgins, Chairperson	Aughamore Rowing Club	Carrowroe, Sligo	1
64	30/11/16	Patrick Barrett, Duggan Barrett Consulting Engineers	Ms. Ellis Barrett	Teeling Street, Sligo	2
65	30/11/16	Mary Callaghan		Ballygawley, Co. Sligo	2
66	30/11/16	Robin Hurley	Ciaran Carty	Consultant Civil Engineer, "Aherlow", Strandhill, Co. Sligo	2
67	30/11/16	Jim Sheridan Architectural Services	Ciaran Carty	Office 4 Airport Business Park, Strandhill, Co. Sligo	2
68	30/11/16	Emma Flanagan, Town Planner	Niall Clarke	3 Molesworth Place, Dublin 2	1
69	30/11/16	Kathy Clark, Collooney Village Redevelopment Ltd.	Daniel Gallagher Rev. Andrew Ison Trevor Sweeney Johnny Banks Ron Ashenden	Collooney, Co. Sligo	2

<b>70</b>	30/11/16	<b>Tommy Conlon</b>		Rathmadder, Gurteen, Co. Sligo	<b>2</b>
<b>71</b>	30/11/16	<b>Michael Connolly</b>		Lodge, Hostel, Surf/Sup School, Shore Road, Strandhill, Co. Sligo	<b>2</b>
<b>72</b>	30/11/16	<b>DAT Property Development Ltd.</b>		Glanmire, Tonaphubble, Sligo	<b>2</b>
<b>73</b>	30/11/16	<b>Simon Davey, Supervalu</b>		Ballymote, Co. Sligo	<b>1</b>
<b>74</b>	30/11/16	<b>Michael Murphy, Development Application Unit</b>	<b>Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs</b>	Newtown Road, Wexford	<b>1</b>
<b>75</b>	30/11/16	<b>Claire Galligan</b>	<b>Disability Linkage Group</b>	Policy Support Service, Sligo Public Participapation Network, Sligo	<b>1</b>
<b>76</b>	30/11/16	<b>Haran &amp; Associates</b>	<b>John Joe Donlon</b>	50 Lower John Street, Sligo	<b>2</b>
<b>77</b>	30/11/16	<b>Peigin Doyle, Hugh Mac Conville, Michael Zaccheus, Marian Zaccheus, Margaret Bergh, Stefan Bergh</b>		C/o Carnadough, Strandhill, Co. Sligo	<b>1 &amp; 2</b>
<b>78</b>	30/11/16	<b>Gael Gibson, Principal Planner</b>	<b>Eirgrid</b>	TheOval, 160 Shelbourne Road, Ballsbridge, Dublin 4	<b>1</b>
<b>79</b>	30/11/16	<b>Liam Flynn, Project Planner</b>	<b>Enerco Energy Ltd.</b>	McCarthy Keville O'Sullivan Ltd., Block 1, G.F.S.C. Moneenageisha Road, Galway	<b>1</b>
<b>80</b>	30/11/16	<b>Dr. Tara Higgins, SEA Section</b>	<b>Environmental Protection Agency</b>	Office of Evidence and Assessment, PO Box 3000, Johnstown Castle Estate, Wexford	<b>1</b>
<b>81</b>	30/11/16	<b>Colm Cummins, Planning &amp; Asset Management</b>	<b>ESB</b>	ESB Business Service Centre, 27 Lower Fitzwilliam Street, Dublin 2.	<b>1</b>
<b>82</b>	30/11/16	<b>Sinead Gallagher, Secretary</b>	<b>Ballisodare Tidy Towns</b>	Ballisodare, Co. Sligo	<b>2</b>
<b>83</b>	30/11/16	<b>Jarlath Gantly, Chairperson</b>	<b>Drumcliffe Development Association</b>	Drumcliffe, Co. Sligo	<b>2</b>
<b>84</b>	30/11/16	<b>Cecily Gilligan</b>		e-mail	<b>1</b>
<b>85</b>	30/11/16	<b>Eddie O'Gorman</b>	<b>Grange and Armada Development Association</b>	Grange, Co. Sligo	<b>1</b>

<b>86</b>	30/11/16	<b>David Minton</b>	<b>Northern &amp; Western Regional Assembly</b>	The Square, Ballaghaderreen, Co. Roscommon	<b>1</b>
<b>87</b>	30/11/16	<b>Madeline O'Dowd</b>		Boyle Road, Gurteen, Co. Sligo	<b>2</b>
<b>88</b>	30/11/16	<b>Marice Henry</b>		Old Dublin Road, Carraroe, Sligo	<b>1</b>
<b>89</b>	30/11/16	<b>John Conneely, Director</b>	<b>Inland Fisheries Ireland</b>	Ardnaree House, Abbeystreet, Ballina, Co. Mayo	<b>1</b>
<b>90</b>	30/11/16	<b>Suzanne James, Spatial Planning Strategy Specialist</b>	<b>Irish Water</b>	Colville House, Talbot Street, Dublin 1	<b>1</b>
<b>91</b>	30/11/16	<b>Stella Burke, Communication and Policy Assistant</b>	<b>Irish Wind Energy Association</b>	Sycamore House, Millennium Park, Osberstown, Naas, Co. Kildare	<b>1</b>
<b>92</b>	30/11/16	<b>Roger Garland</b>	<b>Keep Ireland Open</b>	43 Butterfield Drive, Dublin 14	<b>1</b>
<b>93</b>	30/11/16	<b>Adrian Kenny</b>		Strandhill, Co. Sligo	<b>2</b>
<b>94</b>	30/11/16	<b>Haran &amp; Associates</b>	<b>Jim Kerrigan</b>	50 Lower John Street, Sligo	<b>2</b>
<b>95</b>	30/11/16	<b>Fintan Morrin, Associate, The Planning Partnership</b>	<b>Lidl Ireland</b>	The Planning Partnership, McHale Retail Park, Castlebar, Co. Mayo	<b>1</b>
<b>96</b>	30/11/16	<b>Seamus McCormack, Secretary</b>	<b>Ballintogher Tidy Towns</b>	Altvelid, Ballintogher, Co. Sligo	<b>2</b>
<b>97</b>	30/11/16	<b>Vincent Hannon Architects</b>	<b>Mr. Hugh McGarry</b>	50 Lower John Street, Sligo	<b>2</b>
<b>98</b>	30/11/16	<b>John Monaghan, Architect</b>		First Floor, 14 Teeling Street, Sligo	<b>2</b>
<b>99</b>	30/11/16	<b>Colm McLoughlin, McCutcheon Halley Planning Consultants</b>	<b>Mullan family</b>	C/O Rhatigan & Company Ltd., 14 Teeling Street, Sligo	<b>1</b>
<b>100</b>	30/11/16	<b>Jimmy Mulvey, Jimmy Collins</b>	<b>Rathcormac Sewerage Scheme Committee</b>	Kintogher, Sligo	<b>2</b>
<b>101</b>	30/11/16	<b>Patrick Dunne, Architect</b>	<b>Donal and Moire Murray</b>	90A Knocknashee, Goatstown, Dublin 14	<b>2</b>
<b>102</b>	30/11/16	<b>Enda Duignan</b>	<b>Ms. O'Beirne</b>	Future Analytics consulting Ltd., 23 Fitzwilliam Square (South), Dublin 2	<b>2</b>
<b>103</b>	30/11/16	<b>Sean O'Brien</b>		23 The Lodges, Castledargan, Co. Sligo	<b>2</b>
<b>104</b>	30/11/16	<b>Vincent Hannon Architects</b>	<b>Mr. Cathal O'Connor</b>	50 Lower John Street, Sligo	<b>2</b>

105	30/11/16	Declan O'Connor		O'Connor Cabins, Dublin Road, Ballisodare, Co. Sligo	2
106	30/11/16	Declan O'Connor – Submission 2		O'Connor Cabins, Dublin Road, Ballisodare, Co. Sligo	2
107	30/11/16	Haran and Associates	Mary O'Donnell	50 Lower John Street, Sligo	2
108	30/11/16	Trevor Sadler, Director, Mc Gill Planning Ltd	Oaktree (Sligo Retail Park)	McGill Planning Ltd., No. 7 Fitzwilliam Street Upper, Dublin 2	1
109	30/11/16	Haran and Associates	Martin Oates	50 Lower John Street, Sligo	2
110	30/11/16	Finbarr Filan	RENUA Ireland	finbarrfilan@gmail.com	1
111	30/11/16	John Monaghan, Architect	Rosses Point Development Association	First Floor, 14 Teeling Street, Sligo	2
112	30/11/16	Michael Rowley		Michael Rowley & Associates, Design, Planning Management Consultants, Cloonfinish, Swinford, Co. Mayo	1
113	30/11/16	Jim Sheridan		Jim Sheridan Architectural Services, Office 4, Airport Business Park, Strandhill, Sligo	1
114	30/11/16	Joan Swift	Sligo Cycling Campaign	e-mail	2
115	30/11/16	Eimear Lenehan, Lead Consent Manager	SSE	3 <sup>rd</sup> Floor, Millennium House, 17-25 Great Victoria Street, Belfast BT2 7AQ	1
116	30/11/16	Peter Kinghan, SLR	Harringtons Quarry	7 Dundrum Business Park, Windy Arbour, Dublin	2
117	30/11/16	David McCoy	Strandhill Development Association	Top Road, Strandhill, Co. Sligo	2
118	30/11/16	Jarlath Taheny and local Residents		Collooney, Co. Sligo	1
119	30/11/16	Simon Bradshaw, Planner, GVA	Tesco Ireland	GVA, Segrave House, 19-20 Earlsfort Terrace, Dublin 2	1
120	30/11/16	Daniel Gallagher, Kieran Carol, Sinead Gallagher, Seamus Mc Cormack	Tidy towns groups for Collooney, Ballygawley, Ballysadare, Ballintogher		2

<b>121</b>	30/11/16	<b>John Bailey</b>	<b>Uisce Domhain Water World Europe Ltd.</b>	Carnyara Lavagh, Ballymote, Co. Sligo	<b>1</b>
<b>122</b>	30/11/16	<b>Peter Bowen-Walsh</b>	<b>West=On=Track</b>	Collooney, Co. Sligo	<b>1</b>
<b>123</b>	30/11/16	<b>Robbie Henneberry</b>	<b>Strandhill Golf Club</b>	Strandhill, Co. Sligo	<b>2</b>
<b>124</b>	30/11/16	<b>Gerard Wilson</b>		Greyfield, Gurteen, Co. Sligo	<b>2</b>
<b>125</b>	30/11/16	<b>Dette Cunningham, Senior Executive Planner</b>	<b>Mayo County Council</b>	Aras an Chontae, The Mall, Castlebar, Co. Mayo	<b>1</b>
<b>126</b>	30/11/16	<b>Michael Connolly</b>		Lodge, Hostel, Surf/Sup School, Shore Road, Strandhill, Co. Sligo	<b>2</b>
<b>127</b>	30/11/16	<b>Gearoid Surlis</b>	<b>Supervalu, Tobercurry</b>	Tobercurry	<b>1</b>

### Early submissions – received before 21 September 2016

<b>Ref. No.</b>	<b>Date received</b>	<b>Name or Agency</b>	<b>on behalf of (where applicable)</b>	<b>Address</b>	<b>Volume</b>
<b>E-1</b>	08/07/16	<b>Martin A. Timoney</b>		Bóthar an Chorainn, Cloonagh, Keash, Co. Sligo.	<b>1</b>

### Late submissions – received after 30 November 2016

<b>Ref. No.</b>	<b>Date received</b>	<b>Name or Agency</b>	<b>on behalf of (where applicable)</b>	<b>Address</b>	<b>Volume</b>
<b>L-1</b>	01/12/16	<b>Inspector P Burke</b>	<b>An Garda Síochána</b>	Ballymote District Office	<b>1</b>
<b>L-2</b>	20/01/2017	<b>Anne Marie Finnerty</b>	<b>Skreen and Dromard Development Association</b>	Skreen, Co. Sligo	<b>1</b>