



23rd September, 2021

**Siobhan Gillen,
Administrative Officer,
Planning Section,
Sligo County Council,
City Hall,
Quay Street,
Sligo.
F91 PP44**

**RE: Pre-Draft Public Consultation on the Preparation of Sligo County
Development Plan 2023–2029**

A Chara,

I refer to your notification on 30th July, 2021 that a Strategic Issues Paper in advance of the proposed Draft Sligo County Development Plan had been published and inviting submissions. The Northern and Western Regional Assembly wish to thank you for notifying it of this.

The Regional Assembly is required under S27B of the Planning and Development Act 2000, as amended, to offer its opinion on whether or not the pre-draft and its core strategy, in particular, is consistent with the RSES. The Regional Assembly is required to make recommendations to the council on any amendments necessary to ensure the Pre-Draft Plan is consistent with the RSES and to issue its report and recommendations and observations. The Members of the NWRA considered the report and recommendations and observations at its monthly meeting on 17th September, 2021.

Introduction

Sligo County Council notified the NWRA on 30th July 2021 that a Strategic Issues Paper in advance of the proposed Draft Sligo County Development Plan had now been published and invited submissions. The closing date for receipt of submissions is the September 24th 2020.

The Pre Draft Consultation Paper extends to 20 pages, and is divided into 18 area's of policy, and narrative. There is significant detail set out on the Plan making process, including legal requirements, as well as commentary on the overall Planning Framework, including the RSES, and Project Ireland 2040 - with particular focus on the NPF. The key elements of focus within the Issues Papers are Economic Development, Housing Supply, Compact Growth, Regeneration, Town Centre's first, Climate Action and Sustainable Mobility (Transport).

Background

The Northern and Western Regional Assembly wish to commend Sligo County Council on the publication of the Pre Draft Consultation Issues Papers. The forthcoming County Development Plan will be critical in shaping the medium-term future of the county but also the wider sub-region. The Plan will come at a crucial time for Sligo, insofar as it will be implemented in a period where the

Northern & Western Regional Assembly
The Square, Ballaghaderreen, Co. Roscommon
Tionól Réigiúnach an Tuaiscirt agus an Iarthair
An Chleárnóg, Bealach an Doirín, Co. Ros Comáin

+353 (0)94 9862970

+353 (0)94 9862973

info@nwra.ie



central ambitions for Sligo Town and County set out particularly in the RSES, will seek to achieve more effective Regional Development over the next decade, whilst simultaneously dealing with the challenges of Climate Action responses which are now integral to the entire Policy Framework across Land-use and infrastructure planning.

The Regional Assembly previously engaged with Sligo County Council when the Sligo County Development Plan 2017 – 2023 was varied in mid 2020 – the purpose of that Variation was to align the Development Plan with the NDP and the RSES. The Assembly note the Sligo Issues Papers (Sec. 6 & 7) outline the key requirements of the National Planning Framework, and the RSES, and the implications of same on Local Authority Plans. Several of these key elements of Regional Strategy were successfully incorporated into the current Sligo County Development Plan and a number were, for a combination of reasons, not fully incorporated at that time. The opportunity now exists to review the entire plan and ensure that all elements of the plan are consistent with the RSES.

The recent success of Sligo County Council in securing significant funding commitments under multiple rounds of the RRDF / URDF (Ireland 2040) should be welcomed and acknowledged. The urban regeneration scheme enabled the roll-out of key ambitions set out within the Sligo Public Realm Plan, as well as the City Campus Scheme and the Cultural Hub - all prioritised projects within the RSES, via the Sligo Regional Growth Centre Strategic Plan (Sec 3.7(c)). This illustrates the support given by central government for the ongoing implementation of the vision for Sligo Town set out within the Regional Strategy in collaboration with Sligo County Council.

The delivery of these projects will greatly assist in the achievement of the quantum of Urban Compact Growth as well as the ambition to consolidate the attractiveness and critical mass of Sligo as a Regional Centre to derive wider benefits across a number of sectors for the entire sub-region.

The Draft Development Plan Guidelines for Planning Authorities (DHLGH, Aug 2021) are timely, insofar as there is now additional direction in relation to plan preparation and Core Strategy development, including the following key processes which will be crucial consideration in Sligo Town in particular, including (i) Long Term Strategic Development Sites and (ii) Analysis of lands already Zoned, and extant permissions (Sec. 4.4.1, and 4.4.2 of Draft Guidelines refers).

It should be noted that the Sligo Issues Papers were published several weeks prior to the publication of the Draft Development Plan Guidelines and as a result it is inevitable that certain recommended measures relevant to this stage of the process may not have been comprehensively included within the Pre-Draft Consultation documentation. One of the central tenets of the Draft Guidelines relates to Issues / Options Papers and the inclusion and preparation of Core Strategy Options, which may involve the evaluation of baseline data which may or may not have been prepared at this point in the process (See Section 3.3.1). It is noted that demographic, social and economic data collated as part of the LECP/Sligo 2030 process, which has been commenced, is being compiled and relied upon in the preparation of the Development Plan. There may be benefit in reviewing the baseline data-set against the provisions of the Draft Development Plan Guidelines, including section 3.2 therein, to ensure it satisfies the requirements specified.

Northern & Western Regional Assembly
The Square, Ballaghaderreen, Co. Roscommon
Tionól Réigiúnach an Tuaiscirt agus an Iarthair
An Chlearrnóg, Bealach an Doirín, Co. Ros Comáin

+353 (0)94 9862970
+353 (0)94 9862973
info@nwra.ie



The DDPG in Sec.2.2. contains a very comprehensive inventory of the necessary relevant staff to be involved in the wider Development Plan process team. The Assembly acknowledge that Sligo County Council, similar to a number of other Local Authorities in the Region are challenged in overall staff apportionment.

Comments on Key Draft Development Plan Issues:

The Development Plan will have to be consistent with the RSES but below is a commentary on some of the key elements which the Regional Assembly would highlight needs a particular focus in the forthcoming Plan:

Sligo Regional Growth Centre:

- The Assembly welcome the intent to integrate the main elements of the Sligo Regional Growth Centre Strategic Plan into the Sligo County Development Plan. It is notable that the Housing supply requires significant increase in the output per annum from current levels in the years ahead (2020 – 2031).
- The Assembly note the Issues Papers outline how Strategic Economic locations throughout the County will be identified within the new Plan. In the case of Sligo RGCSP, a number of significant landbanks, such as those lands at Oakfield, Ballytivnan / Rathbraughan, and Ballinode, have been identified and their phasing for development should be considered within the context of Section 4.4.4 of the Draft Guidelines.
- The Sligo RGCSP sets out the ratio of Jobs to population growth ambition of 1:2 as per the National Planning Framework, and this should be factored into the vision for delivery of all key strategic lands out to 2040.
- The commitment to undertake a Local Transport Plan for Sligo Regional Growth Centre is to be welcomed and it should be prepared in tandem with the Draft Plan to inform land-use planning considerations, as advocated under RPO 6.27 of the RSES is welcomed.
- Provision for the expansion of Sligo Town's residential supply to be rolled out in a sequential / optimal manner where appropriate, inclusive of easy access to green infrastructure and public transport corridors is also welcomed.
- The inclusion of a Building Heights Study for the Sligo Regional Growth Centre, as reflected in RPO 3.7.44 will be of strategic benefit within the context of an overall strategy for the settlement.
- The Assembly commend Sligo County Council in its preliminary identification of a Decarbonising Zone, which is substantial in scale, and encompasses potential benefit to a significant population.

Northern & Western Regional Assembly
The Square, Ballaghaderreen, Co. Roscommon
Tionól Réigiúnach an Tuaiscirt agus an Iarthair
An Chleárnóg, Bealach an Doirín, Co. Ros Comáin

+353 (0)94 9862970
+353 (0)94 9862973
info@nwra.ie



Core Strategy:

- The Issues Paper signals an improved alignment between this plan and higher level plans, NFP and RSES, with reference to terminology associated with the designations in the settlement hierarchy and within the plan generally. This is to be welcomed.
- The plan should identify and prioritise a programme for the provision of serviced sites within smaller towns and villages, so as to be consistent with the provisions of RPO 3.7 of the RSES.
- The inclusion of a mechanism within Rural Housing Policy / Overall Housing Policy to reflect the ambition of RPO 3.3 in the nuanced targeting of reuse of derelict dwellings / farm buildings in the countryside is signposted in the issues papers and is welcome. Brownfield sites have been defined within the RSES.

Transport:

- The Assembly welcome the commitment signalled to a new sustainable mobility policy. Within Sligo Town, there are a number of existing trails / routes, which are earmarked for continued expansion within the Sligo RGCSP, refers: RPO 3.7.51.
- Several key land transport network projects have recently been completed, or are ongoing, which will be of significant advantage to Sligo's projected growth as outlined within the RSES - which is within the period of the forthcoming Plan and beyond. The ongoing N-4 upgrade from Collooney, the completion of the Western Distributor Road, and finalisation of upgrade works at Hughes Bridge (N-4) are illustrations of progressing priority infrastructure between 2018 – 2021. The plan represents an opportunity to include objectives to deliver these land transport networks and to ensure that their strategic capacity and safety will be managed and enhanced to ensure their optimal use for inter and intra-regional connectivity. These have been identified in Chapter 6.3 of the RSES together with a suite of transport investment priorities that should also be included in the development plan for Sligo County – relating to international connectivity, road network, rail network, bus network, rural transport, walking and cycling and Local transport Plans.
- The advancement of Greenway projects including the SLNCR Intra-Regional Route connecting Sligo to Leitrim and beyond is a Sustainable Transport Scheme which can be significantly advanced during the lifetime of the 2023 – 2029 Plan and such schemes should be included as an objective of the plan (See Section 5.8 of the RSES). The advancement and prioritisation of the upgrade of the N-15 route from Sligo Town northwards to Leitrim / Donegal and it's progression within the lifetime of the forthcoming Plan period should be clearly outlined. This project is listed within RPO 6.8 of the RSES and identified to assist the advancement and development of Sligo as an Urban Centre within the medium term.
- The importance of rail connectivity and capacity needs to be highlighted within the development plan in a manner consistent with the RSES and within the context of the ongoing national review.

Northern & Western Regional Assembly
The Square, Ballaghaderreen, Co. Roscommon
Tionól Réigiúnach an Tuaiscirt agus an Iarthair
An Chleárnóg, Bealach an Dóirín, Co. Ros Comáin

+353 (0)94 9862970

+353 (0)94 9862973

info@nwra.ie



Additional Considerations:

- The RSES includes reference (RPO 5.3) to the ambition to consider the zone of (i) North Sligo / North Leitrim (Benbulbin and its hinterland) and (ii) Lough Arrow / Lough Key as a potential National Park / National Recreation area. Collaboration to realising this goal will be crucial and it would be important that the Draft Sligo County Development Plan reflects this within the Planning Policy Framework. The creation of such Zone's / amenity areas should share the ethos of the RSES, wherein it is advocated adverse impacts upon local communities, archaeology, built heritage, landscapes and habitats are minimised while at the same time ensuring social, environmental and economic benefits accruing to local economies are maximised. The Draft Plan should reflect the regional ambition embodied within this Objective.
- The RSES via RPO 5.2 encourages co-operation between Local Authorities in determining Landscape Character along County boundaries. The preparation of a new Landscape Character Assessment (LCA) for County Sligo may be worthy of consideration as it is noted that the current LCA for County Sligo appears to have been completed in 1996 - thus it is likely to benefit from review. Consideration could be given to undertake an LCA within a specified period following publication of the Draft Plan if it is not feasible to complete at this stage in the process.
- To achieve the shared vision for the region the RSES recognises the need to strengthen our digital network and enable new technologies to work by ensuring that policies and systems are in place that can help people transition to a world much more digitally connected. RPOs 6.36 - 6.60 are tailored to promote smart places. The reference to Smart initiatives (Sec.11) within the Issues Papers is welcome and they present the potential to influence other policy and programme instruments, including the County Sligo LECP when reviewed.
- The plan should also consider how to support the following Regional Development Objectives:
 - a. RPO 6.4 Smart Ports
 - b. RPO 7.1- 7.6 Education/Skills- including support for Technological University.
 - c. RPO 7.8 Slainte Care.
 - d. RPO 7.11 Healthy Ireland.
 - e. RPO 7.14 Specific designation of lands for nursing homes and sheltered housing.
 - f. RPO 8.2 Support Electricity Transmission Projects in Sligo (North West Project).
 - g. RPO 8.5 and 8.6 Gas Networks and Natural Gas.
 - h. RPO 8.8 Support for implementation of CURWMP.
 - i. RPO 8.15 and 8.17 Water Infrastructure projects.

If you have any queries in respect of the above observations, then do not hesitate to revert.

Is mise le meas,

David Minton
Director

Northern & Western Regional Assembly
The Square, Ballaghaderreen, Co. Roscommon

Tionól Réigiúnach an Tuaiscirt agus an Iarthair
An Chlearróg, Bealach an Doirín, Co. Ros Comáin

+353 (0)94 9862970

+353 (0)94 9862973

info@nwra.ie