



Sligo County Council
Riverside
Sligo

Via portal: consult.sligococo.ie

21/12/2023

RE: DRAFT SLIGO COUNTY DEVELOPMENT PLAN 2024 – 2030

A Chara,

I refer to notification dated 15 October 2023 of the Draft County Development Plan (2024-2030) and thank you for the opportunity to provide this submission.

The NWRA is required under Section 27B of the Planning and Development Act 2000 (as amended) to offer its opinion on whether or not the draft plan and its core strategy is consistent with the Regional Spatial and Economic Strategy (RSES) and its objectives. The NWRA is required to make recommendations to the planning authority on any amendments necessary to ensure the Draft Plan is consistent with the RSES and to issue its report, recommendations and observations. I set out hereinunder the report of the Northern and Western Regional Assembly (NWRA), together with recommendations and observations.

THE PLAN-MAKING PROCESS TO DATE

A review of the Sligo County Development Plan 2017 – 2023 commenced in 2021. Notice of the Development Plan review was given to the public and the prescribed bodies on 30th July 2021. An Issues Paper was published, and the pre-draft consultation process took place from 30th July to 24th September 2021. The NWRA drafted a submission on the Issues Paper in October 2021. The submission of the Assembly at that time raised a number of key issues, which can be summarised as follows:

- Welcomed the intent to integrate the main elements of the Sligo Regional Growth Centre Strategic Plan into the Sligo County Development Plan.
- The importance of economic land banks within Sligo Town for its future growth, given NPF & RSES targets on population / jobs growth, with a ratio 3:2 to 2040. The need to identify measures to significantly increase housing supply given the low level of housing completions annually, particularly within Sligo Town. The potential benefits of introducing RPO 3.3 in respect of bringing derelict houses / buildings back into use.
- The local delivery in some form of RPO 3.7 in the provision of Local Authority sites (serviced) in smaller towns / villages.
- The importance of carrying out a Landscape Character Assessment (LCA) for the County, Ref: RPO 5.2.
- The strengthening of digital networks within the County, and
- The provisions of RPO 8.2 in terms of regional priorities on the Electricity Grid augmentation and strengthening.

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

Tionól Réigiúnach an Iuaiscirt agus an Iarthair
An Chomhairle Rialtais na n-Deifrín, Co. Ros Comáin

PLAN CONTENT

The draft Plan consists of four volumes containing 53 chapters:

- **Volume 1 – Core Strategy**
This volume contains chapters 1-9 of the draft Plan consisting of Introduction; Climate Action; Core Strategy Statement; Sligo Regional Growth Centre Strategic Plan (RSES); Settlement Strategy; Housing Delivery Strategy; Economic Strategy; Retail Strategy; and Transport Strategy.
- **Volume 2 – Urban Development**
This volume contains chapters 10-22 of the draft Plan consisting of General Urban Development Principals; individual chapters for Sligo town, 3 support towns (Tobercurry, Ballymote, Enniscrone) and 8 villages (Ballysadare, Collooney, Cooloney-Rockfield, Grange, Strandhill, Easky, Mullaghmore, Rosses Point).
- **Volume 3 – General Policies**
This volume contains chapters 23-33 of the draft Plan consisting of general policies in relation to Landscape Character; Natural Heritage; Built Heritage; Residential Development; Community & Social Infrastructure; Economic Development; Transport Infrastructure; Water Infrastructure; Energy & Telecommunications; Flood Risk; and Development Management Standards.
- **Volume 4 – Village Plans**
This volume contains chapters 34-53 consisting of a chapter on each of the 19 villages identified within the plan area (Aclare, Ballinacarrow, Ballinafad, Ballincar, Ballintogher, Bellaghy, Bunnanadden, Carney, Castlebaldwin, Cliffony, Cloonacool, Culfadda, Curry, Dromore West, Drumcliff, Geevagh, Gorteen, Monasteraden and Riverstown) profiling and including specific objectives for each village; and a chapter on unserved (5) villages. A map for each settlement is contained in this Volume.

There are also **9 Appendices** accompanying the Draft Plan. These include:

- Infrastructural Assessment (IA)
- Settlement Capacity Audits (SCA)
- Designated Scenic Routes
- Designated nature conservation areas
- County Biodiversity Sites
- Geological Heritage Sites
- National monuments in State care
- Public rights-of-way
- Statement of compliance with Section 28 Guidelines

A Landscape Character Assessment Map (A1 format) is also part of the Draft Plan.

The Draft Plan is also accompanied by the following documents, which have informed the planning authority in the formulating of the draft plan policies and objectives:

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- Housing Strategy
- Draft Sligo Local Transport Plan
- Environmental Report (Strategic Environmental Assessment)
- Natura Impact Report (Appropriate Assessment)
- Strategic Flood Risk Assessment
- Wine Street Car Park Masterplan

ASSESSMENT OF THE DRAFT SLIGO COUNTY DEVELOPMENT PLAN 2024-2030

General Observations: The draft Plan and accompanying documents are a comprehensive suite of documents and Sligo County Council is to be commended for the extensive preparation, and consultation which went into preparing all the documents.

Content and Layout: It is recognised that the preparation of a development plan is a complex piece of work comprising consideration of multiple and intricate public policy areas at national and regional level. It is considered that the draft Plan as presented is very lengthy, which has become the norm with all development plans, as noted in reports on other draft development plans. There may be an opportunity to reduce the extent of text through the use of graphs, charts, engaging infographics and maps. Furthermore, the draft plan would benefit from cross-referencing to aid navigation, as certain topics are located within several chapters.

Vision and Strategic Objectives: Reference is made to the draft Plan providing a spatial planning framework designed to support the economic and social development of the County as envisioned in the *Sligo 2030* strategy document (Local Economic and Community Plan), however there is no defined overall vision for the future development of County Sligo set out in the draft Plan. The planning authority may wish to consider the inclusion of a Vision with supporting strategic objectives in achieving the same at the beginning of the draft Plan.

Illustrating compliance with the Regional Spatial and Economic Strategy (RSES): Throughout the draft Plan there are references to the RSES, and the relevant RPOs are included/referenced in the draft Plan. Chapter 4, Sligo Regional Growth Centre Strategic Plan, clearly identifies all the relevant RPOS in the RSES and how, in the opinion of the planning authority, the draft Plan complies with the relevant policies and objectives of the RSES¹. This is a welcomed approach.

Demographics & Data: It is noted that given the timeline associated with the development plan process, and availability of the 2022 Census data, a considerable amount of data is from the 2016 Census and other dated data, except for some population data. This data will be 8 years old on publication of the adopted Plan. Notable change has occurred in Ireland, including Sligo, over the last decade. In addition, with the passing and implementation of new planning legislation imminent, the draft Plan when adopted may be in place for 10 years rather than the current period of 6 years.

Sligo Local Area Plan: It is noted that Sligo County Council intend to prepare a Local Area Plan for Sligo and environs. In reflecting the RSES Objective towards the rolling out of Local Transport Plans (LTPs, Refers: RPO 6.35) Sligo County Council has via Jacobs Consulting produced a Local Transport Plan which has 6 central pillars, including supporting the Governments Climate Action Plan (CAP). It is encouraging to note Sligo County Council has already rolled out a number of Sustainable Mobility

¹ A list of RPOs relating to Sligo Regional Growth Centre Strategic Plan and compliance/intended compliance with same in the draft Plan is listed in Appendix 1 of this report.

projects across the Town, with the E-Bikes Scheme being one example where modal shift away from single car trips can be successfully achieved.

Implementation: As with all plans and strategies, implementation is crucial to delivery and ultimately success. While the current planning legislation provides for a progress report 2 years following the adoption of the Plan, reference to the same could be included in the draft Plan, with key performance indicators included. The planning authority may wish to consider applying specific timelines to more objectives in the draft Plan based on prioritising the delivery of achievable projects within the timeframe of the adopted Plan.

Regional Ambitions – A work in progress: As noted above in the case of Local Transport Plans, a significant number of the objectives in the RSES relating to Sligo have already been achieved (e.g. RPO 3.7.41 Western Distributor Road) or are currently being implemented and this is welcomed. Where objectives have not been achieved it is noted that provisions have been made in the draft Plan to advance further projects (e.g. the Eastern Garavogue Bridge and Approach Roads Scheme (RPO 3.7.40 and SO-RGC-1); Cranmore Regeneration (a strategic site for regeneration in the RSES and SO-RGC-3); and the IDA Business Park at Oakfield (RPO 3.7.46 and SP-RGC-2). The progress of a number of such key strategic pieces of infrastructure is to be welcomed, and this continued investment, including the public realm schemes via the URDF will contribute to Sligo’s overall growth in the years ahead.

Population, Housing and Settlement Strategy (Chapters 3,4,5,6,26,27, and Volume 2 and Volume 4): The draft Plan recognises Sligo as a Regional Growth Centre capable of leading the development of the surrounding region. The draft Plan also acknowledges Sligo Town’s functionality as a regionally important centre, serving as the administrative, commercial, service, health and educational focus for a large hinterland, with significant distributor role as a major centre in the North-West. It is recognised that there is a pressing need to focus on Sligo Town and its role as a Regional Growth Centre. Whilst there is a considerable amount of detail associated with the development of Sligo town, including zoning and strategic designations, it is clearly signalled that Sligo Town will also be subject to the preparation of a Local Area Plan which will contain more detailed objectives. Sec. 3.7 of the RSES (The Regional Growth Centre Strategic Plan for Sligo Town) remains the blueprint for the multi year growth of Sligo Town, and the various public realm projects which are progressing are embedded therein. The Local Area Plan² will be required to be consistent with a hierarchy of Strategies and Plans including this County Development Plan when adopted, the Regional Spatial and Economic Strategy and the National Planning Framework. It is noted in the draft Plan that some of the relevant objectives in the RSES will be addressed/included in the LAP.

The Rural Area Types outlined within Chapter 5 reflect the approach of previous County Plans for Sligo, with Area’s Under Urban Influence, around the main urban centres, and Remote Rural Areas across parts of the West and South of the County. Additionally, Green Belt designations are outlined around a number of settlements as a policy mechanism to constrain suburban housing build up on the edges of villages.

In relation to population growth, it is stated in the draft Plan that research has indicated that County Sligo is on track to achieve or even surpass the population projections set out in the National Planning Framework – Ireland 2040. This ambition is reflected in the figures for the County through

² or appropriate plan type following the enactment of the Planning and Development Bill 2023 (if relevant). This footnote applies to all references to “local area plan” in this submission

Census 2022, where the population figure (70,200) is already almost at the ceiling forecast in the NPF Roadmap (2018). The draft Plan includes a settlement hierarchy that is broadly reflective of the current County Development Plan (2018 – 2024).

The Housing Need Demand Assessment (HNDA – Chapter 6) outlines the very low base of housing output which pertains to County Sligo at present, in 2022 housing completions reached 211. The Housing Supply Target Management (HSTM) analysis supplied with this Plan forecasts almost 4,000 new houses are required to be built in Sligo by 2030, which would average at around 500 units per annum, thus, supply would need to increase by 150% from the current output. This will be a challenge to achieve and sustain. The Assembly note there are a combination of factors which are outside of the control of Local Authorities across the Region at present which militate against the expansion of housing supply including high interest rates, the high cost of construction, both labour and materials, as well the lack of skills within the construction sector nationally, particularly in areas such as retrofitting.

Having regard to the above, it is vital Sligo County Council utilise all mechanisms for the delivery of housing units across the County. The level of residential vacancy is high, and sits at circa 20% (Census, 2022). The Assembly consider with this in mind, RPO 3.3 should be reflected in the Strategic Housing Policies in some form at a local level in an attempt to effect an increase in the utilisation of disused buildings / houses.

Towns	
Regional Growth Centre (RGC)	Sligo Town (and Environs)
Support Towns	Ballymote, Tobercurry, Enniscrone

Villages	
RGC Satellite Villages	Ballysadare, Collooney, Coolaney, Grange, Strandhill
Villages with Special Coastal Tourism Functions	Easky, Mullaghmore, Rosses Point
Villages Sustaining Rural Communities (serviced)	Aclare, Ballinacarrow, Ballinafad, Ballincar, Ballintogher, Bellaghy, Bunnanadden, Carney, Castlebaldwin, Cliffony, Cloonacool, Culfadda, Curry, Dromore West, Drumcliff, Geevagh, Gorteen, Monasteraden, Riverstown
Unserviced villages and dispersed settlement in rural areas	Ballygawley, Banada, Ransboro, Rathcormac, Tourlestrane and rural areas

Figure 1: Sligo Settlement Hierarchy – Core Strategy, Draft Plan.

The Core Strategy table below sets out further detail on population targets and lands zoned for housing for the hierarchy settlements. It is noted and welcome that the Census 2022 figures have been used in this regard.

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

Figure 2: Sligo Draft CDP, Population Distribution by settlement within Core Strategy.

It is noted in the draft Plan that "A series of complex factors, including a chronic shortage of investment in the town, have influenced new households to locate outside the Sligo Borough boundary. It is evident from Tables 5.4 (below) and 5.5 (further in this chapter) that the Environs of Sligo and the Satellite Villages have seen significant population growth in the 2000s" and that Sligo County Council has been striving to reverse this trend through major regeneration projects (e.g. Cranmore Regeneration) and public realm interventions (e.g. O'Connell Street, Queen Maeve Square etc).

The Regional Assembly are aware that there is a pronounced lack of private investment in housing projects in many towns in the Region, and this is not exclusive to Sligo town. The RSES 2 year

Implementation Report illustrates this to be the case across all of the designated centres for growth, with housing completions well below the targets set out in Section 3 of the RSES. It is noted that the draft Plan proposes to plan for a population target for Sligo that is significantly below that specified in the RSES population *minimum* target i.e. it is proposed to set a population target of 23,800 instead of the minimum target of 25,360³

The justification offered by Sligo County Council for establishing a lower population target/ambition for Sligo town than that outlined in the RSES is that it is “a very ambitious target, which may not be realised based on past trends.” The NWRA recognise that there is an attempt through the draft plan to locate populations and development into a hierarchy of serviced towns and villages, with a focus on regeneration, and this is welcomed. The RSES has set important ambitions for the growth of Key Towns and Regional Growth Centre’s. The extent of this ambition is based upon the recognition in the NPF that the Northern and Western Region suffers from an historically weak urban structure, and an ongoing lack of Centre’s of real scale outside of Galway City. The RSES include objectives (including RPOs 3.1 - 3.4) placing an emphasis on accelerating the development of Sligo, Letterkenny and Athlone to serve as wider economic and social drivers for significant Sub Regions / Counties. This strategy remains a Regional priority, and via the NPF Review in early 2024, the Assembly will be advocating mechanisms to aid its achievement. The NWRA consider it is inappropriate to conclude growth of 40% to 2040 is not achievable in a multi annual process, and it is recommended that the planning authority reconsider this approach and ensure consistency with RPO 3.7.37 in the RSES. The Assembly would also highlight another Regional Centre within the Region⁴ has recently adopted a Local Area Plan, which retains the RSES ambitions set out in 2020, and consistency of approach to National Policy hierarchy will be critical to the ambition of achieving agglomeration via Regional Growth Centres, with continued focus of significant Capital State investment.

While included in the Housing Strategy of the draft Plan, and there is reference to accommodation in objective SO-RGC-7 (masterplan for the City Campus site – Sligo’s Cultural and Learning Hub), it is not clear if the draft Plan accommodates growth for student accommodation in private-rented units outside of student villages over the Plan period. It is considered that this should be clearly stated and/or addressed in the draft Plan. It is noted that Sligo County Council has not engaged in implementing the Ready to Build Scheme, as all lands in the ownership of the Local Authority were committed in the Housing Delivery Action Plan 2022-2026. It is the intention of RPO 3.7 within the RSES to encourage and support local authorities in identifying and prioritising a program for the provision of serviced sites within smaller towns and villages within 1 year of the adoption of the RSES. The objective further states, “A rolling 2-year implementation plan shall subsequently be prepared.” It is considered that the draft Plan should provide an opportunity to review Sligo County Council’s proposed approach and include some proposals/provision for serviced sites in the draft Plan at appropriate locations.

Strategic objective SO-RGC-2 states it is an objective of Sligo County Council to carry out a building height study targeting increased housing densities in Sligo Town Centre. This is welcome as it brings effect to RPO 3.7.44 of the RSES. However, while the narrative in the draft Plan indicates a timeline for achieving this objective (i.e. carried out in conjunction with the preparation of a Local Area Plan for Sligo and Environs) the strategic objective does not. The plan would benefit from inclusion of a timeline in strategic objective SO-RGC-2, reflecting the intent to carry out a Building Height Assessment as part of the LAP.

³ Minimum target in RSES is 25,800 by 2031; this figure of 25,360 has been calculated by SCC as required target for 2030 reflecting the development plan period.

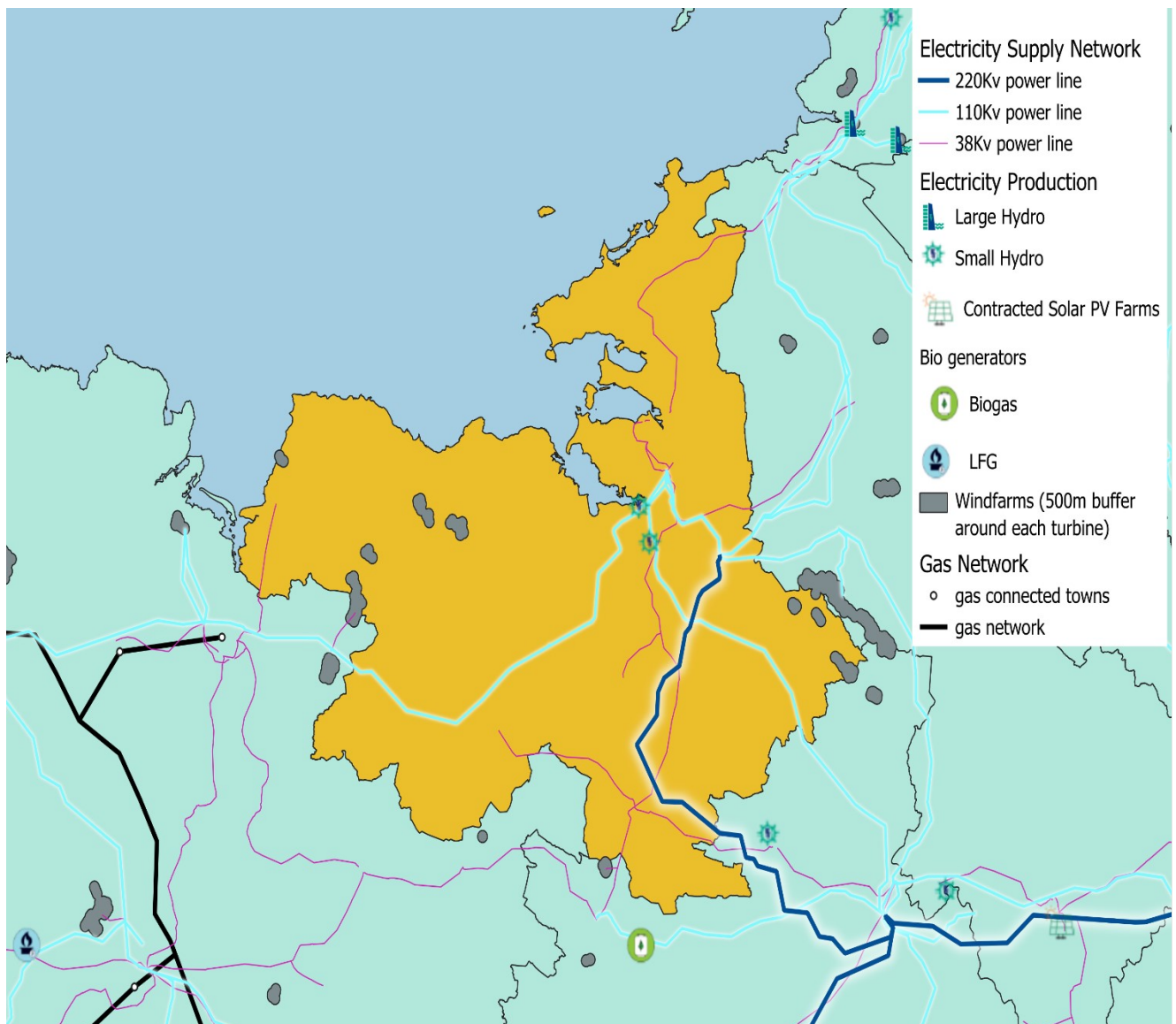
⁴ Letterkenny Local Area Plan, 2023 – 2029, Adopted by Donegal County Council, Nov. 2023.

Infrastructure (Chapters 4, 9, 29, 30, 31):

At a macro level, Sligo has benefitted from a number of infrastructure advancements since the launch of the NPF. These include the completion of the N-4 Collooney – Castlebaldwin Road Scheme, and the Western Distributor Road within Sligo Town. However, some other key pieces of Inter Urban Projects remain in need of investment, including upgrading of the Sligo – Dublin Rail Line, and the N-15 Sligo – Bundoran, and N-17 Upgrade: Knock – Coolooney Road Scheme, all of which form part of the European Ten – T Comprehensive Network. It is noteworthy the State is required by the European Commission to have all Ten – T Comprehensive Networks upgraded to an appropriate standard of service by 2050, and if the aforementioned schemes are not advanced to pre appraisal stage in the near future, there will be a concern as to the ability of Tii to deliver the necessary upgrades along the Atlantic Economic Corridor.

It is noted that while RPO 3.7.40 (Enhance intra-urban access by providing an additional north-south connection through the Eastern Garavogue Bridge and Approach Roads Scheme, to be completed by 2021) has not been achieved, a strategic objective (SO-RGC-1) and a regional and local roads objective (O-RLR-2) is included in the draft Plan to achieve this. SO-RGC-1 includes a timeframe associated with its delivery i.e. within the lifetime of the Plan. However, objective O-RLR-2 does not include a timeframe. The planning authority should consider including a timeframe similar to SO-RGC-1.

A notable omission from the Draft Plan is the lack of any detail in respect of a Renewable Energy Strategy for the County. The recent Climate Action Plan, and Action 102 therein set out the need to significantly scale up the provision of onshore renewable energy across the Country. Whilst the Regional Assembly may be asked to lead on a Regional Renewable Electricity Strategy (RRES), the intermission between its formulation, and the adoption of the Sligo CDP may be protracted, and it would be important to have a clear set of policy provisions in the interim. While the draft Plan indicates that the preparation of a Strategy will commence following the publication of a regional renewable electricity strategy and in the interim development proposals will be considered on a case-by-case basis, it is considered that there should be clearer guidance for locating potential renewable energy developments. The plan would benefit from an analysis of areas suitable for renewable energy development and inclusion of spatial designations which identify areas suitable for renewable energy, open to consideration or not suitable as required. The SEAI Methodology for Local Authority Renewable Energy Strategies and government guidelines may be of assistance to Sligo County Council in this regard. To pursue the approach to Renewable Energy growth for the County outlined above will contribute to some extent, towards the achievement of consistency with the Regional Renewable Energy RPOs in the RSES, specifically, RPO 4.16 and RPO 4.17.



Map 1: Renewable Energy Projects, Sligo and surrounding Counties (Projects, Source: SEAI)

Economic Development (Chapters 7, 8, 28)

While an Economic Strategy and Retail Strategy are included in the draft Plan and lands have been zoned for Business, Industry and Enterprise it appears that there are no calculations of land or assessment of service provision for such lands. Sligo recorded a significant increase in people employed between 2016 – 2022, with a steady growth in new jobs, reinforced by a number of significant announcements in Sligo Town. The Assembly recognise it is critical for future growth to ensure an adequate amount of serviced employment lands are available going forward, RPO 3.7.57 of the RSES seeks an increase in the number of jobs in the Regional Growth Centre to 17,000 by 2040. Based on recent performance, this ambition may be realised.

Within Sligo Town, where additional employment lands will be required, it is considered that unserviced lands at Ballytivnan and Rathbraughan should be prioritised for service provision/development to assist in complying with RPO 3.7.53 (Encourage new companies to locate on lands zoned for business and enterprise at Ballytivnan and Rathbraughan, to the North of the Urban Core) within the Regional Growth Centre Strategic Plan for Sligo. The Plan may benefit with

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the addition of a policy objective which is included in the Business, Enterprise and Industry Policies and/or Water Infrastructure chapter and any other relevant chapters to actively pursue the servicing of these lands with Uisce Éireann, the relevant roads authority and/or relevant service/infrastructure provider.

There does not appear to be a major tourist attraction in Sligo town identified in the Plan. Part of RPO 3.7.56 of the RSES supports the development of a major tourist attraction in Sligo Town. Reference is made to Sligo Gaol in the draft Plan, but it is not clear if this is the proposed major tourist attraction. The planning authority should seek to deliver RPO 3.7.56 through the inclusion of a major tourist attraction in Sligo town as a policy/objective in the draft Plan and the detail could be delivered through the Local Area Plan making process.

Climate, Heritage and Landscape (Chapters 1, 2, 23, 24, 25)

While it is recognised that the draft Plan is underpinned by environmental assessments and climate action measures, it is considered that it lacks an up-to-date Landscape Character Assessment. The Landscape Character Map accompanying the draft Plan appears to be based on a landscape characterisation and appraisal study completed in 1996 and it does not incorporate a Seascape Assessment. Notwithstanding any pending National or Regional landscape appraisals, Sligo County Council may wish to review the position in relation to preparing a new Landscape Appraisal for the county. This would assist in the implementation of RPO 5.2 of the RSES.

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

RECOMMENDATIONS:

1. That the Plan is amended to adjust the population targets for Sligo town from 23,800 to 25,360 so that it is consistent with the target set out in RPO 3.7.37 of the RSES. The review should also include a reappraisal of the necessary residential zoning to ensure adequate serviced land is available in Sligo town to accommodate any revised population targets and required housing units as set out in RPO 3.7.38 (provision of 3,000 to 5,000 residential units to accommodate the additional population envisaged by 2040).
2. That the Plan is reviewed to confirm provision is made in future housing units and zoning for private-rented student accommodation to support the growth of ATU Sligo - a strategic Regional asset, which will be vital in growing the Region by providing access to skills, research career development and innovation.
3. That the Plan provides detail, including timelines, in prioritising a program for the provision of serviced sites within smaller towns and villages to ensure the plan is consistent with RPO 3.7 of the RSES.
4. The Plan is amended to include a timeframe in respect of objective O-RLR-2 (Vol 3 p.95) similar to SO-RGC-1 (Vol 1 p.31) to achieve delivery of RPO 3.7.40 of the RSES i.e. Eastern Garavogue Bridge and Approach Roads Scheme.

5. That the Plan is amended to include modifications to Volume 3, which includes additional Land-use clarification via mapping and associated policies which identify established areas / areas for repowering / potentially open to consideration / not favoured areas for renewable energy development.
6. (a) That the Plan considers the NPF and RSES ambition in respect of Population to Jobs Ratio (3:2), given the recent Census Results for Sligo wherein the population figure for the County is now marginally below that assigned via the NPF implementation Roadmap (July, 2018), and the implications of same for Sligo as a Regional Growth Centre.

(b) Arising from 6(a) that the Plan be amended to include an analysis of land required for business, industry and enterprise zoning. The revision may consider an analysis of the extent of land required with the associated service provision of proposed areas to assist in achieving RPO 3.7.57 of the RSES (an increase in the number of jobs in the Regional Growth Centre to 17,000 by 2040). Where additional land is required within a settlement, it is suggested that locations are selected to comply with RPOs in the RSES and where the lands are currently not serviced, policies/objectives are included in the draft Plan to actively pursue servicing of the land within the lifetime of the Plan.
7. That the planning authority review lands in flood risk zones, to align with flood risk management aims set out in RPO 3.10 and RPO 3.11 of the RSES.
8. The Plan is amended to include within the Core Strategy, and perhaps in Volume 3 in further detail, a clearly defined objective for the review and preparation of a new Landscape Appraisal for the county. It is suggested such a review should commence within the first year of the adoption of the draft Plan. This would assist in the implementation of RPO 5.2 of the RSES.
9. That Chapter 06 of the Plan (Strategic Housing Objectives) is expanded to include additional measures to reduce the 20.1% housing vacancy level recorded in Census 2022 to give effect to RPO 3.3 where a minimum of 20% of new rural housing will be delivered on brownfield sites.

OBSERVATIONS:

1. That the Plan incorporate cross-referencing of topics across the plan.
2. A review and updating of all documentation with current available data/information that is emerging, through for example Census 2022, be undertaken.
3. The Plan should be amended to incorporate an objective/policy to explore the delivery of a tourist attraction(s) of scale within Sligo town as part of the draft Plan and this may be examined further in the proposed Sligo & Environs Local Area Plan. This would aid consistency with the RSES, given RPO 3.7.56 supports the development of a major tourist attraction in Sligo Town.

4. A revision of the Introduction (Chapter 1) to the Plan should be undertaken to clearly convey an all of County vision for the lifetime of the Plan period and associated strategic objectives to be included at the beginning of the Plan.
5. Chapter 09 of the Plan to be reviewed to include revised text on the completion of the necessary upgrades of the Ten-T Comprehensive Network to enable delivery before 2050, as required under EU Regulation⁵ in respect of the N-17 and N-15 Route Upgrades – and as envisaged in RPO 6.7 and RPO 6.8.
6. The Plan should incorporate the inclusion of a Review and Implementation Strategy for the Plan, which includes key performance indicators and timelines. It is considered appropriate that objectives are accompanied by clear timelines, whether short, medium or long term.

SUMMARY COMMENTS:

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

The Assembly view the minimum demographic / housing targets together with associated economic advancement and service provision for Sligo Town as a designated Regional Growth Centre to be of fundamental importance in redressing the growing Regional economic disparity between the Northern & Western Region, and other 2 Regions in Ireland. For the Northern & Western Region, building Centre's of urban scale will be a multi year endeavour, across a number of Plan periods and the Planning Policy hierarchy should continue to reflect and cultivate this aim.

I trust that the above is of assistance and the Assembly wish to thank Sligo County Council for the opportunity given to provide this submission. If you have any queries in respect of the above, then do not hesitate to revert.

Mise le meas



Denis Kelly
Director

⁵ EU Ten-T Comprehensive Network Regulation, 2023.

APPENDIX 1
LIST OF REGIONAL PLANNING OBJECTIVES FOR SLIGO REGIONAL GROWTH CENTRE SPATIAL PLAN
AND COMPLIANCE/INTENDED COMPLIANCE WITH SAME IN THE DRAFT SLIGO COUNTY
DEVELOPMENT PLAN 2024-2030

Sligo RGCSP		
RPO NO.	TEXT	SDCDP (with NWRA comments where considered required by the NWRA)
3.7.37	Support population growth in the principal urban area of Sligo to a level of at least 27,200 persons by 2040.	The population target for Sligo Town is set out in Chapter 5 Settlement Strategy. NWRA comment: A population of 23,800 is proposed to 2030, which is under the calculated amount of 25,360.
3.7.38	Facilitate the provision of 3,000 to 5,000 residential units to accommodate the additional population envisaged by 2040.	The housing allocation for Sligo Town is set out in Chapter 3 Core Strategy Statement. The allocation amounts to circa 2,500 dwellings to be delivered by 2030. This would facilitate the achievement of the target set by RPO 3.7.38 for 2040 NWRA comment: draft Plan zoned for 2952 units; 1185 units required for population increase in draft Plan; 1762 units required if population target increased to match that of RSES.
3.7.39	Ensure that at least 40% of new residential and employment-related development in the Regional Growth Centre occurs within Sligo's existing built-up urban area, through regeneration and consolidation on infill and brownfield sites.	The Settlement Capacity Audit (SCA) for Sligo Town, demonstrates that more than 40% of new housing development can be accommodated on infill and brownfield sites.
3.7.40	Enhance intra-urban access by providing an additional north-south connection through the Eastern Garavogue Bridge and Approach Roads Scheme, to be completed by 2021.	As the scheme could not be completed by 2021, a strategic objective (SO-RGC-1) is included in this chapter and a regional and

		<p>local roads objective (O-RLR-2) is included in Chapter 29 Transport Infrastructure (Vol.3).</p> <p>NWRA comment: SO-RGC-1 is time specific i.e. within lifetime of the adopted Plan. O-RLR-2 is not time specific.</p>
3.7.41	Kick-start development to the south-west of the urban core by completing the Western Distributor Road by 2020.	The Western Distributor Road has been completed on time, therefore this RPO has been achieved.
3.7.42	Prioritise new residential and employment related development on greenfield sites in the areas served by the Western Distributor Road at Caltragh and Oakfield, and at Ballinode, which will be served by the Eastern Garavogue Bridge and Approach Roads Scheme.	<p>The Settlement Capacity Audit carried out for Sligo Town prioritises greenfield lands at Oakfield and Ballinode for development in conjunction with the WDR and the Eastern Garavogue Bridge and Roads Scheme.</p> <p>NWRA comment: Caltragh and Oakfield Tier 1 (serviced); Ballinode not fully serviced in parts. SO-RGC-4 Seek the development of new urban quarters at Caltragh and Ballinode, based on land assembly and comprehensive masterplanning with appropriate phasing.</p> <p>Zoning includes Strategic Land Reserve sites in Ballinode area.</p>
3.7.43	Improve urban circulation by increasing junction capacity along Sligo's Inner Relief Road (N4/N15) and provide new link roads, as necessary, to complete the "ring route" around the town centre.	The Strategic Transport Objectives for Sligo Town, included in Chapter 11 (Volume 2), specify the corridors to be reserved for the provision of the urban roads necessary to improve circulation around the town centre.
3.7.44	The Assembly supports the preparation of a building heights study, a strategy to guide the	The required building height study will be carried out in

	<p>future development of the regional centre. The study will take into account the historic, cultural and infrastructural features of the area. In developing this strategy, areas of high density will target the minimum density rates of 50 units per hectare (in the town centre area) and a default rate of 35 units per hectare otherwise.</p>	<p>conjunction with the preparation of a Local Area Plan for Sligo and Environs. A strategic objective in this regard is included in this chapter.</p> <p>NWRA comment: SO-RGC-2 states “Carry out a building height study targeting increased housing densities in Sligo Town Centre.” Should include wording to reflect this will be done as part of the LAP process.</p>
3.7.45	<p>The Assembly supports the retention of existing agricultural land within the RGCSP boundary for that purpose unless it is subject to objectives for the zoning of lands for particular purposes (whether residential, commercial, industrial, recreational, as open space or otherwise) in a statutory plan. Only in exceptional circumstances would it support the development of new residential, industrial or commercial uses on unserviced greenfield sites and these shall be defined through the statutory plan-making process.</p>	<p>Within the RGC Strategic Plan area, the lands zoned for development as part of this Plan are located in Sligo Town, Ballysadare, Strandhill and Rosses Point. This Plan includes adequate provisions to generally retain the current agricultural use on all greenfield lands located outside the development limits of the four zoned settlements, and outside the village boundaries of Ballincar, Drumcliff, Rathcormac and Ransboro. The entire RGC SP area is located in the designated rural area under urban influence (RAUI) surrounding Sligo Town. The relevant strategic settlement policy for RAUI is SP-S-9 in Chapter 5 of this Plan. The RSES indicates that local economic development should be achieved through supporting higher education, servicing new business and enterprise zones, investing in transport infrastructure and the Smart City Initiative, and progressing tourism projects. Some of these actions fall outside the remit of the CDP but are adequately supported through the LECSP/Sligo 2030 strategy.</p>

3.7.46	Facilitate the development of a new IDA Business Park at Oakfield, to the south-west of the urban core.	This RPO is implemented through the strategic policy SP-RGC-2 for the IDA lands at Oakfield, and in the zoning included in Chapter 11 Sligo Town Plan (Volume 2).
3.7.47	Promote Local Heritage and Culture to deliver high-quality cultural and tourism products of Regional and National significance.	<p>While the promotion of local heritage and cultural tourism is normally carried out by specialised, statutory bodies (e.g. Heritage Council, Failte Ireland), Sligo County Council has included relevant actions in its LECP/Sligo 2030 strategy. This County Development Plan contains policies designed to protect natural and cultural heritage (Chapters 23 Landscape Character, 24 Natural Heritage, 25 Built Heritage). Overall, the CDP sets a comprehensive policy framework which is adequate for managing proposals related to tourism developments of any scale – local, regional or national (refer to Volume 3, Chapter 28 Economic development).</p> <p>Strategic goal – Liveable Sligo Relating mainly to Sligo Town, this goal requires the enhancement of the built environment and the use of open space to benefit residents, support businesses and attract tourists.</p> <p>Three “Key liveability projects” are listed – the O’Connell Street enhancement (completed in 2022), the Stephen Street Cultural Plaza (renamed Queen Maeve Square – works commenced in 2023) and the “Green Link South” to potential future greenways.</p>

3.7.48	Upgrade the town centre environment through focused interventions in O'Connell Street, Stephen Street and car park, Rockwood Parade, Market Cross, Old Market Street and Quay Street car park, followed by gradual improvements of streets adjoining the centre.	This RPO is reflected in the strategic objective SO-RGC-8 in this chapter.
3.7.49	Prepare/commission and implement a new masterplan for the Centre Block (Wine Street car park).	This RPO is reflected in the strategic objective SO-RGC-6 in this chapter.
3.7.50	Complete the remaining phases of the major recreational complex planned at Cleveragh Estate and Doorly Park, adjoining the Garavogue River.	This RPO is reflected in the strategic objective for green corridors in Chapter 11 (Sligo Town).
3.7.51	Continue the expansion of cycleways and walking routes throughout the urban area and outwards to the satellite villages of Ballysadare, Strandhill and Rosses Point, linking into established and planned recreational trails such as Union Wood, Knocknarea etc.	This RPO is reflected in the strategic objective for green corridors in Chapter 11 (Sligo Town).
3.7.52	Promote the consolidation of the existing IDA business Park at Finisklin and the possible expansion of other business and enterprise activities into the Northern Docklands area.	This RPO is reflected in the strategic policies for the IDA lands at Finisklin (SP-RGC-2) and for the Docklands area (SO-RGC-5) included in this chapter, and in the zoning objectives for Sligo Town (Chapter 11, Volume 2).
3.7.53	Encourage new companies to locate on lands zoned for business and enterprise at Ballytivnan and Rathbraughan, to the North of the Urban Core.	This RPO is reflected in the zoning objectives for Sligo Town (Chapter 11, Volume 2). NWRA comment: It is not clear if these lands are fully serviced. Should there be a requirement for additional land to be serviced for business, enterprise and industry and the land is unserved at these locations, a policy/object should be included to prioritise the servicing of the land.

3.7.54	Strengthen physical connectivity by improving National Road links to Dublin (N4), Galway (N-17), and Letterkenny (N-15) as well as the cross-border link to Enniskillen/ Belfast (N-16).	The implementation of this RPO is within the remit of the TII, with funding provided through the National Development Plan. The CDP supports the RPO through its national roads objectives contained in Chapter 29 Transport infrastructure NWRA comment: All included in Table 29.2
3.7.55	To give effect to the infrastructure needed to transform Sligo into a 'Smart City', able to provide advanced digital services to citizens and businesses.	The implementation of relevant infrastructure policies contained in Volume 2 of this Plan will support the transformation of Sligo into a 'Smart City' as envisaged by the LECP/Sligo 2030 document.
3.7.56	Support the development of a major tourist attraction in Sligo Town, as well as further expansion in the tourism functions of villages Strandhill and Rosses Point.	This RPO is reflected in the provisions of Section 28.3 Tourism (Chapter 28 Economic development, in Volume 3). In addition, the Special Coastal Tourism functions are retained in the Settlement Strategy for Strandhill and Rosses Point. NWRA comment: There does not appear to be a major tourist attraction in Sligo town identified in the Plan. This may be done through the LAP or other plan process and a policy/objective should be provided for the same.
3.7.57	Seek an increase in the number of jobs in the Regional Growth Centre to 17,000 by 2040.	This RPO is addressed in the Sligo Town Plan (Chapter 11) essentially by zoning sufficient, serviced and suitable land for residential and business/enterprise development, in order to accommodate the additional population targeted by the NPF, with a corresponding growth in

		<p>the number of persons employed in the RGC SP area.</p> <p>NWRA comment: calculations and analysis of lands zoned for business, enterprise and industry would be useful.</p>
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