



Planning Office
Sligo County Council Planning Office
City Hall
Quay Street
Sligo

Via portal : consult.sligococco.ie

05/07/2024

RE: PROPOSED AMENDMENTS TO THE DRAFT SLIGO COUNTY DEVELOPMENT PLAN 2024 – 2030

DISCLAIMER: THE NORTHERN AND WESTERN REGIONAL ASSEMBLY ('THE ASSEMBLY') WILL NEXT CONVENE ON FRIDAY 12 JULY 2024, AT WHICH TIME THE NEW MEMBERSHIP OF THE ASSEMBLY WILL BE CONFIRMED (FOLLOWING THE LOCAL ELECTIONS HELD ON 7 JUNE 2024) AND A NEW CATHAOIRLEACH AND LES CATHAOIRLEACH OF THE ASSEMBLY WILL BE ELECTED. AT THE TIME OF MAKING THIS SUBMISSION, THE NEW ASSEMBLY HAS NOT YET BEEN CONSTITUTED. THEREFORE, THIS SUBMISSION IS MADE WITH THE APPROVAL OF THE EXECUTIVE OF THE ASSEMBLY ONLY AND THE VIEWS EXPRESSED ARE NOT NECESSARILY THE VIEWS OF THE ASSEMBLY AS FULLY CONSTITUTED.

ON 12 JULY 2024, THE NEW ASSEMBLY WILL BE NOTIFIED OF THE BASIS OF MAKING THIS SUBMISSION, AND THE EXECUTIVE WILL BE IN CONTACT WITH SLIGO COUNTY COUNCIL SHOULD ANY FURTHER ISSUES ARISE FROM IT.

A Chara,

I refer to your notification on 7 June 2024 of Sligo County Council's proposal to make amendments to the Draft Sligo County Development Plan 2024-2030 and thank you for the opportunity to make this submission.

The Assembly notes that the Proposed Amendments are considerable. In total there are 311 – including,

205 amendments to **Volume 1 – 4,**

85 Zoning Amendments (PAZ 01- 85) (P-FZ-01)

1 to **Flood Zones** P-FZ-01

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1 to **Infrastructure Assessment** (PA-A.2-01) and 1 to **Buildings of Note** (PA-B-01)

4 to **Draft Local Transport Plan** (PA-LTP-1 to PA-LTP-4)

10 to the **Strategic Flood Risk Assessment** (PA-SFRA-1 to PA-SFRA-10)

Many of the Proposed Amendments are relatively minor within a regional context, involving additional narrative and references that are generally supported by the Assembly, and they do not need to be examined individually. The Assembly's submission will concentrate on amendments that have regional significance and comment on their consistency or otherwise with the RSES. The Proposed Amendments which are deemed to be of regional significance to the Assembly will be identified in this submission.

Plan Making Process to Date

The Assembly has engaged with Sligo County Council at all stages of the process and initially made a submission at the Issues Papers Stage. On 21 December 2023, the Assembly made a further submission on the draft plan, making 9 Recommendations and 6 Observations on the Draft. This submission, along with other submissions received by the Council (Total Number 211), were considered at a meeting of Sligo County Council in April, May & June 2024 and resolutions were passed to make proposed amendments to the Draft Plan.

The following section will provide a summary of the Recommendations and Observations made by the Assembly and will also provide a commentary on the outcome of the consideration of Sligo County Council and whether it proposes to make an amendment that shall deliver consistency with the RSES. Thereafter, an account shall be given of other Proposed Amendments of regional significance and whether they are consistent with the RSES.

RECOMMENDATIONS MADE BY THE NWRA TO THE DRAFT SLIGO DEVELOPMENT PLAN:

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).

Outcome: PA-02

Table 3.2 in Section 3.3 is amended accordingly and is consistent with RPO 3.7.37 & 3.7.38 of the RSES.

Comment: In relation to Recommendation 1, the Proposed Alteration PA-02 amends Core Strategy Table 3.2 Population Targets to 25,360 for Sligo Town Regional Growth Centre, as requested by the OPR and Assembly submission. All associated text and objectives and projections are amended accordingly. The reappraisal in the CE Report to Members adjudicates that no additional zoning allocation for Sligo Town is required

under the response to OPR submission. Overall, the response to this recommendation (and the OPR Recommendation 1) gives the Plan greater consistency with the RSES.

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.

Outcome: PA-95 The Insertion of text to Section 26.3 Housing for Persons with Diverse Needs. 26.3.4 Student Accommodation addresses this recommendation of the NWRA.

26.3.4 Student accommodation

In April 2022, IT Sligo, GMIT and Letterkenny IT merged to form the Atlantic Technological University (ATU). ATU Sligo, comprising St Angela's College and the former IT Sligo, had a combined enrolment of 10,200 students (8,600 and 1,600 respectively) for the academic year 2022/23. There are seven purpose-built student villages serving these students; all are within a short walking distance of the colleges, with over 2,000 bed spaces available. While many students commute to college from outside Sligo Town and even County, demand for accommodation in the private rented sector is strong. Given future growth in student numbers, ATU Sligo will continue to represent a significant part of the demand for private rented accommodation in Sligo town. This demand can be met either on-campus or in its vicinity, on lands zoned for residential and mixed uses. Sligo County Council will support the provision of student accommodation both on campus and off campus

Comment: In relation to Recommendation 2, the insertion of text at section 26.3 appropriately addresses the Assembly recommendation and gives due recognition to the Strategic role of the ATU for the future of the county of Sligo and the wider region, and that a multi-faceted approach to student accommodation is envisaged and provided for in the plan.

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.

Outcome: PA -19 and PA-20

PA-19 Insertion of text to Section 6.5 Housing Land Provision Ready to Build Scheme

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

Stream 2 will see local authorities make available serviced sites at reduced cost to support self-build home ownership. Under Stream 2, local authorities will make serviced sites in towns and villages available to potential individual purchasers. These sites will be

available at a discount on the market value of the site for the building of a property for occupation as the principal private residence of the purchaser. It is intended that Sligo County Council will prepare a programme for the acquisition of suitable sites and make them available for development by providing services and access to these sites.

PA-20 the inclusion an additional strategic housing objective as follows:

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

Comment: In relation to Recommendation 3, the Proposed Amendment PA-19 (insertion of Text & PA-20 - additional strategic housing objective, SO-HOU-3), prioritising a program for the acquisition of 'Ready to Build Scheme' sites across towns and villages within a one year timeframe, is deemed appropriate. This Proposed Amendment brings the plan in line with RPO 3.7 of the RSES.

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

Outcome: No amendment.

It is noted that the Chief Executive Report on submissions made to the Draft Plan states: 'While it is envisaged that the scheme will be delivered within the lifetime of the Plan, there are a number of variables outside the control of the Planning Authority. Therefore, it is not considered appropriate to include the suggested timeframe within the Plan.' (CE Report)

Comment: The inclusion of an objective in the plan indicates that it is something that should be delivered over the lifetime of the plan and it is not an indication that its provision is solely within the control of the planning authority to deliver. Furthermore, it should be noted that the Planning and Development Bill 2023 is being considered by the Oireachtas and the life of the plan may become longer than 6 years. The delivery of the Objective would benefit from a timeline and restatement of a commitment to the delivery of the N17 and N15 upgrade but its absence may be a missed opportunity for Sligo and the North-West region. However, there is no opportunity for the Assembly to make a further submission on this as it is not the subject of a Proposed Amendment.

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.

Outcome: New objective **O-LCP-3**

PA: 69 Include an additional landscape character protection objective as follows:

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

Comment: In relation to Recommendation 5, the Proposed Amendment PA-69 (insertion of new objective, **O-LCP-3**) undertakes to prepare an updated Landscape Character Assessment for County Sligo in conjunction with the forthcoming Renewable Energy Strategy, referring to **O-REN-1**, which undertakes to Prepare a Renewable Energy Strategy within one year of the publication of the Regional Renewable Electricity Strategy (NWRA). This approach is not optimum, however, it is a commitment to bridging a policy gap within a short timeframe, and thus represents an improvement in approach overall.

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.

Outcome: PA -23 In Section 7.1.1 RSES Growth Ambition 1, include the following paragraph at the end of the section:

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

PA-27 In Section 7.3 Spatial planning for economic development, insert additional subsection as follows: Zoning land for business, industry and enterprise Having regard to the envisaged County population increase of circa 6360 people by 2030, and a labour force participation rate of circa 66% (much higher than the 58.3% recorded by Census 2022 for County Sligo), it would be reasonable to expect circa 4,200 jobs to be needed by the end of the Plan period. Assuming that: • new jobs will be created in the same proportions as the current ones – i.e. 75% in Services, 20% in Industry and 5% in Agriculture, AND

• employment in education/healthcare/public administration will continue to represent circa 35% of the total, it will be necessary to accommodate a minimum of 20% (Industry) to a maximum of 60% (Industry plus Services excluding education/health/public administration) of the total number of new jobs on lands zoned BIE.

The maximum number of 2,520 jobs (60% of 4,200) would require a maximum floorspace of 126,000 sq.m if such jobs were all in manufacturing (using an estimate of 50 sq.m per employee, as exemplified in the Development Plan Guidelines 2023, p. 125). Applying a blanket plot ratio of 0.5, the amount of land needed for BIE would be circa 252,000 sq.m, i.e. 25.2 ha for the entire County. The Draft Plan zones circa 290 ha for business, industry and enterprise purposes in 18 settlements. Most of these lands – approximately 205 ha – are located strategically within the Regional Growth Centre

area, particularly in Sligo Town (198 ha), and are capable of supporting far in excess of 2,500 industrial/enterprise jobs.

Comment: In relation to Recommendation 6, the Proposed Amendment PA-27 which provides an additional subsection to **7.3 Spatial planning for economic development** provides a reasoned analysis of land required for business, industry and enterprise zoning, having regard to the envisaged population increase for the county. The approach gives justification for the current zoning allocation, which is deemed capable of supporting in excess of 2,500 industrial/ enterprise jobs. Overall, the response to this recommendation gives the Plan greater consistency with the NPF and RSES ambition in respect of Population to Jobs Ratio (3:2).

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.

Outcome: PA-163 In Section 32.1.2 Strategic Flood Risk Assessment, modification to the third paragraph as follows:

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

Comment: In relation to Recommendation 7, the Proposed Amendment PA-163 includes the following text insertion ‘and have been informed by future scenario datasets (mapped in the accompanying SFRA)’ and this Proposed amendment gives the plan greater consistency with the RSES, RPO 3.10 and RPO 3.11.

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.

Outcome: PA-69 O-LCP-3, in Chapter 23 Landscape Character

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

Comment: As referred to above under Recommendation 5, the insertion of new objective, **O-LCP-3** which undertakes to prepare an updated Landscape Character Assessment for County Sligo in conjunction with the forthcoming Renewable Energy Strategy, is deemed to be an acceptable approach.

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.

Outcome: PA-21 Chapter 6 Housing delivery strategy revised to include a strategic objective **SP-HOU-4** reflecting RPO 3.3, with a view to further reducing rural housing vacancy rates.

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

Comment: This Proposed Amendment brings the plan in line with RPO 3.7 of the RSES.

OBSERVATIONS MADE BY THE ASSEMBLY TO THE DRAFT SLIGO DEVELOPMENT PLAN:

As was outlined at the outset of this report, the Assembly Submission on the Draft Plan included 6 Observations, set out below is the detail, and assessment on the outcomes of these Observations, which apply across a range of Chapters.

1. That the Plan incorporate cross-referencing of topics across the plan.

Outcome: No change to the Draft Plan was said to be required at this stage.

The Chief Executive report on submissions stated that... 'Cross-referencing will be provided when the final, adopted version of the Development Plan is prepared for publication'.

Comment: This response is noted and should represent an improvement in the framing and legibility of policy.

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

Outcome: No change to the Draft Plan.

The Chief Executive report on submissions stated that.. 'Most of the 2022 Census data had not yet been published in 2023, before the completion of the Draft Plan. It is intended to update relevant figures as per Census 2022 published reports before the publication of the adopted Plan'. CE report

Comment: This response is noted and should represent an improvement in the framing of policy.

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.

Outcome: PA- 119:

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

Comment: This response moves the Plan closer in vision to the Sligo Regional Growth Centre Plan contained within the RSES, given RPO 3.7.56 supports the development of a major tourist attraction in Sligo Town, and is welcomed.

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.

Outcome: No change to the Draft Plan.

Comment: This may represent a missed opportunity, but its absence will not render the plan inconsistent with the RSES, and for that reason it was an observation that was made by the Assembly.

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 Regulation¹ in respect of the N-17 and N-15 Route Upgrades – and as envisaged in RPO 6.7 and RPO 6.8.

Outcome: No change to the Draft Plan.

The CE Report states the following in relation to this Observation; *‘The delivery by the State – through the TII – of the upgrades to the TEN-T/Trans-European Comprehensive Transport Network by 2050 is outside the scope of Sligo County Development Plan 2024-2030. Chapter 9 Transport Strategy makes appropriate reference to the TEN-T in the introduction to Chapter 9, including details in a footnote on page 71 of Volume 1.’*

Comment: In this regard the concern raised by the NWRA was the ability of TII to deliver the necessary upgrades along the Atlantic Economic Corridor, should the aforementioned schemes not be advanced to pre appraisal stage in the near future. To reflect this in Chapter 9 would highlight the importance the upgrade of the N17 and the N-15, has to enabling regional connectivity and enhancing competitiveness.

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.

Outcome: PA -7 In Chapter 3 Core Strategy Statement, include an additional section as follows:

3.4 Monitoring the implementation of the Plan’s objectives

In accordance with the Planning and Development Act 2000 (as amended), the Chief Executive of the Planning Authority shall “give a report to the members of the authority on the progress achieved in securing the objectives” of the Development Plan not more than two years after the making of the Plan. This implementation report must reflect the output of a monitoring system which is partly in place but needs to be updated to comply with the most recent guidance. The Development Plan Guidelines (2022) clarify

¹ EU Ten-T Comprehensive Network Regulation, 2023.

that the monitoring task of the Planning Authority comprises two elements: annual Core Strategy monitoring and biennial Plan objectives monitoring (including SEA monitoring).

3.4.1 & 3.4.2

Comment: This issue overlaps with Observation 7 raised by the OPR and is dealt with in that response under PA-7, and the associated inclusion of new Sections Under 3.4, 3.4.1 and 3.4.2.

In relation to timeframes the response states that, in section 3.4.2 *'The majority of objectives contained in the Development Plan have been formulated in a manner that allows their monitoring over the lifetime of the plan. While in general the objectives are specific, measurable and realistic, not all of them have a precise timeframe, due to a variety of factors.'* This response is noted and deemed reasoned.

General Comments – Building Height Study – Strategic Objective

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

Outcome. Amend the wording of the Strategic Objective SO-RGC-2 as follows:

'Carry out a building height study targeting increased housing densities in Sligo Town Centre in conjunction with the preparation of a Local Area Plan for Sligo and Environs'.

Comment: This Proposed Amendment provides a timeframe for delivery of building height study and is to be commended, particularly in the context of the preparation of the Sligo Town Plan.

COMMENTARY ON ADDITIONAL PROPOSED AMENDMENTS TO THE DRAFT COUNTY DEVELOPMENT PLAN:

The issues highlighted in the Assembly's initial submission to the Draft Sligo CDP have been examined in the previous section. In this section, those Proposed Amendments of regional significance that have not been captured in the previous section are summarised briefly, and dealt with (in Chapter Order) below:

1. Chapter 4 – Sligo Regional Growth Centre

PA-10: Water infrastructure SO-RGC-9

In co-operation with Uisce Éireann, pursue the provision of the water service infrastructure upgrades and expansion necessary to support the planned development of Sligo Regional Growth Centre.

Comment: The Assembly welcome these amendments and consider them to be aligned with the ambitions of the RSES and in particular RPO 3.7.37 -39 & 3.7.57.

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2. Chapter 9 – Transport Strategy

PA33: Include an additional strategic transport policy as follows:

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

Comment: The Assembly welcome the Proposed Amendment, and consider it to be aligned with the ambitions of the RSES and in particular RPO 3.7.54

PA34: SP-TRA-7

Support the reopening of the Western Rail Corridor in order to deliver the Sligo–Claremorris–Tuam–Athenry Rail to an appropriate level of service and at a standard capable for facilitating passenger and freight transport and present an opportunity to provide an integrated rail linkage to the Ireland West Airport Knock.

Comment: The Assembly welcome the Proposed Amendment, and consider it to be aligned with the ambitions of the RSES and in particular RPO 6.13

3. Chapter 10 – Urban development principles

In Section 10.1.1. Town Centre First Policy, insert the following paragraph:

PA-37: As indicated under Action 9 in Appendix 1 of the Town Centre First Policy document, the Land Development Agency will support the Policy’s objectives in towns with populations over 10,000 persons. The LDA has confirmed its commitment to actively engage with the Council and other state authorities to identify the potential for the reuse of vacant and underutilised sites in Sligo Town.

Comment: The Assembly welcome the Proposed Amendment and consider it to be aligned with the ambitions of the RSES, Refers: RPO 3.7.48 & RPO 7.20, as well as recent additions to National Policy on Regeneration / Town Renewal.

4. Chapter 24 – Natural heritage

PA-80: Insert an additional Biodiversity policy, as follows:

P-BD-7 Require development proposals on sites of 0.5 ha and over to demonstrate a site-specific biodiversity net gain (BNG), indicating how the approach to development will leave the natural environment in a measurably better state that it was beforehand. The same approach will be encouraged, although not required, on sites under 0.5 ha. The biodiversity net gain (BNG) shall consist of the enhancement and restoration of existing habitats or by the creation of new areas for wildlife, where the biodiversity value of the site is low or non-existent (e.g. certain brownfield sites).

PA-82: In Section 24.1 Biodiversity, insert three Artificial lighting at night policies as follows: Artificial lighting at night - policies P-ALAN-1 Ensure that artificial lighting of public buildings and car parking areas is used only, when necessary, with dark-sky friendly lighting and design. New developments shall eliminate or mitigate for potential light pollution. P-ALAN-2 Where artificial lighting must be used, require developments to

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avoid glare and light trespass on adjacent natural areas such as hedgerows, road verges, tree lines, wetlands and river corridors, using shields and appropriate lighting design. P-ALAN-3 Require proposals for floodlighting of playing fields/pitches to include lighting schemes with measures to mitigate for light pollution through timing and the use of shielding. All schemes shall comply with the guidance within the Institution of Lighting Professionals (ILP) Guidance Note (GN01-2021) The Reduction of Obtrusive Light

PA-83: In Section 24.1 Biodiversity, insert a new Artificial lighting at night objective, as follows: Artificial lighting at night - objective O-ALAN-1 Develop a County Lighting Strategy during the life of the development plan. The Strategy will include the adoption of Environmental Lighting Zones to ensure that the appropriate lighting levels are used in each zone, with protection for identified dark areas.

PA-85: In Section 24.1 Biodiversity, add a new **Biodiversity policy P-BD-8** as follows: P-BD-8 Where buildings are proposed to be restored or demolished/replaced, the applicants/developers shall check for the presence of protected wildlife species and follow the protocols set out in the Heritage Council’s guidelines “Wildlife in Buildings – Linking Our Built and Natural Heritage” (<https://www.heritagecouncil.ie/content/files/Wildlife-in-Buildings-linking-our-built-and-natural-heritage.pdf>)

Comment: The Assembly welcome these Proposed Amendments and consider them to be aligned with the ambitions of the RSES and in particular the Overarching Environmental Regional Policy Objective 5 and RPO 5.6.

5. Chapter 25 – Built heritage

PA 87 In Section 25.3 Architectural heritage, add the following set of policies, including the (relocated and reformulated) P-VH-7: Historic settlements policies:

P-HS-1 Seek the retention of surviving street layout, historic building lines, traditional plot sizes/widths in the villages and towns of Sligo where these derive from medieval or earlier origins, and incorporate ancient boundaries or layouts, such as burgage plots and townland boundaries, into any re-developments.

P-HS-2 Require the preservation in-situ of significant medieval masonry remains found during the course of development works and, where practicable, support the presentation of such remains as part of the completed development.

P-HS-3 Secure the preservation in-situ of surviving above-ground urban medieval and 16th/17th century structures, by ensuring that any permitted development does not result in the loss of such remains which may survive within buildings which are, or appear to be, of later date.

P-HS-4 Consider excluding basement developments in archaeologically sensitive areas, particularly in urban Zones of Archaeological Potential and where there are buried waterlogged deposits

Comment: The Assembly welcome these proposed Amendments and consider them to be aligned with the ambitions of the RSES and in particular RPO 5.14.

6. Chapter 27 – Community and social infrastructure

PA-101: In Section 27.3 Educational facilities, insert an additional policy as follows:

P-ED-Pursue the provision of a new primary school in Sligo Town, in conjunction with any planned, large urban extension, based on a masterplan or other appropriate planning framework applicable to the lands zoned for community facilities or residential development and, mixed uses to the south-west of the Town's built-up area.

Comment: The Assembly welcome the Proposed Amendment and consider it to be aligned with the ambitions of the RSES and in particular RPO 7.15.

PA- 106: In Section 27.7.4 Outdoor recreational amenities, insert the following additional policy:

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

Comment: The Assembly welcome the Proposed Amendment and consider it to be aligned with the ambitions of the RSES and in particular Overarching Environmental Regional Policy Objective 5 and RPO 5.6 and 5.19.

7. Chapter 28 – Economic Development

PA-115: In Section 28.3 Tourism development, insert an additional policy as follows:

P-TOU-9 A. Facilitate the provision of new tourist accommodation and the expansion or upgrading of existing hotels, guesthouses, B&Bs and other tourist accommodation premises at appropriate locations throughout the County, particularly in areas with existing services. B. Support the redevelopment of brownfield sites, both in settlements and in rural areas, for the provision of tourist accommodation. C. Support the development of camping, glamping and facilities for campervans/motor homes/touring caravans, both within settlements and in rural locations across the County. Sites in rural locations should be close to existing tourist establishments where it can be demonstrated that there is a justifiable demand for new accommodation, and that the proposed development will not adversely affect the character, environmental quality and amenity of the rural area

PA-116: In Section 28.3 Tourism development, insert an additional Tourism policy as follows:

P-TOU-8 Support the implementation of the Sligo Destination Experience Development Plan (DEDP), continuing the collaboration with Fáilte Ireland and tourism stakeholders.

PA-118: In Section 28.3 Tourism development, add the following Tourism development policy:

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P-TOU-7 Support the implementation of the WAW Regional Tourism Development Strategy 2023-2027 (and any successor strategies) in collaboration with Failte Ireland and tourism stakeholders.

PA-119: In Section 28.3 Tourism development, include an additional Tourism development objective as follows:

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

The Assembly welcome these Proposed Amendments and consider them to be aligned with the ambitions of the RSES and in particular Tourism related goals, set out in RPO 3.7.56 & RPO 4.5.

8. Chapter 29 – Transport infrastructure

PA-134: In Section 29.4 Active travel infrastructure, include an additional Cycling and walking policy as follows:

P-CW-7 Facilitate the provision of bike parking facilities (including lockers) at appropriate locations near bus stops and at bus stations.

PA-135: In Section 29.4 Active travel infrastructure, include an additional Cycling and walking objective as follows:

O-CW-8 Prioritise the delivery of a ‘Coastal Mobility Route’ from Strandhill to Rosses Point.

PA-136: In Section 29.4 Active travel infrastructure, include three additional Cycling and walking objectives under the heading Active travel along national roads as follows: Active travel along national roads O-CW-5 Complete the development of the N4/N16 Active Travel Scheme from the N4 Caltragh Interchange to the N16 Abbvie Roundabout.

O-CW-6 Complete the development of active travel facilities through villages of Grange, Ballysadare and Curry. **O-CW-7** Complete the development of active travel facilities which form part of major and minor national road realignment projects on the N17, N16, N15 and N59.

Comment: The Assembly welcome these Proposed Amendments and consider them to be aligned with the ambitions of the RSES and in particular RPO 6.50.

PA-137 In Section 29.6 Public transport, include an additional public transport policy as follows:

P-PT-8 Continue to seek to improve the road network to allow for the provision of a higher-quality, reliable bus service, together with enhanced connections to the railway stations in Sligo, Collooney and Ballymote.

The Assembly welcome the Proposed Amendment and consider it to be aligned with the ambitions of the RSES and in particular RPO 6.21 & 6.22.

9. Chapter 31 – Energy and telecommunications

PA-150 Amend the wording in the first paragraph of policy P-EN-2 as follows:

P-EN-2 Facilitate the production of energy from renewable sources and secure the maximum potential from wind energy resources within County Sligo, including the augmentation, upgrading and improvements to existing wind farms, subject to strict location, siting and design criteria.

PA-153 Insert the following additional energy policy:

P-EN-6 Support the ocean energy research, development and demonstration pathway for emerging marine technologies (wave, tidal, floating wind, other types of marine energy developments) and facilitate the provision of associated test infrastructure.

PA-154: Insert the following additional energy policy:

P-EN-7 Facilitate proposals for secure, appropriately scaled energy storage infrastructure, including green hydrogen gas storage, which support energy efficiency and reusable energy systems, subject to assessment of their potential impact on communities, environmental assessments and normal planning considerations.

PA-155: Insert the following additional energy policy:

P-EN-8 Support proposals for hybrid energy systems and co-location of renewable energy infrastructure where it can be demonstrated that such developments will not have adverse impacts on the surrounding environment.

The Assembly welcome these Proposed Amendments and consider them to be aligned with the ambitions of the RSES and in particular RPO 4.17, 4.18 & 4.33.

COMMENTARY ON ZONING AMENDMENTS TO SLIGO ZONING PLAN:

SLIGO TOWN PLAN PAZ 1-16

There are 16 zoning amendments to the Sligo Town Zoning Plan, 7 of which merit consideration due to the role of Sligo as a Regional Growth Centre as per RSES and NPF.

PAZ 09 -PAZ – 15 are addressed below.

PAZ Analysis:

PAZ 9, PAZ11-15

The proposed amendments in **PAZ 9 and PAZ11-15** represent significant amendments to the Sligo Town Plan that would constitute an increase of approximately 66.87ha. of **nRES** (New Residential) zoned land, primarily at the periphery of the plan area or outside the plan area.

This increase would represent a 75% increase in the overall Residential Zoning allocation for the Sligo Town Plan area, as per current Core Strategy allocation.

Please refer to Appendix I of this report for mapped PAZ as per the published Proposed Amendments.

Table 1.1

TABLE 1.1 – Sligo PAZ 9, 11-15 Summary		
PAZ	Description of the proposed amendment	Net Increase in nRES Zoning ha.
PAZ - 09	Zone 2.48 ha to nRES from the Strategic Land Reserve (SLR) at Farranacardy, (Sligo Town Map 2 of 4).	2.48
PAZ-11	Change the zoning of 3.06 ha of Green Belt to 2.46 ha nRES and 0.6 ha OS (Sligo Town Map 3 of 4)	2.46
PAZ -12	Change the zoning of 1.40 ha from GB to nRES (Sligo Town Map 3 of 4).	1.40
PAZ- 13	Remove 27.08 ha of nRES from the Strategic Land Reserve (SLR) (Sligo Town Map 3 of 4).	27.08
PAZ -14	Change the zoning of 10.26 ha from GB to nRES (Sligo Town Map 2 of 4).	10.26
PAZ-15	Change the zoning of 23.19 ha from GB to nRES and include in the Strategic Land Reserve (SLR) (Sligo Town Map 2 of 4).	23.19
Total Ha. additional nRES		66.87

As addressed above under Recommendations 1 and 2, the population targets for Sligo Town have been revised from 23,800 to 25,360 to make them consistent with the target set out in RPO 3.7.37 of the RSES. This revision included a reappraisal of the zoning allocations for the Regional Growth Centre of Sligo Town and found these to be adequate to accommodate the projected growth. This amounted to 86.85ha. of Proposed RES and Mix Zoning for Sligo Town, allocated as set out in the Revised Core Strategy (Table 3.2).

However, these Proposed Amendments provide for approximately 66ha. of additional nRES New Residential Zoning landbank (as proposed under PAZ-9-15). These proposed additional lands would generate between 2,500 and 3,000 additional residential units at the density of 35-50 dwelling units per hectare as required for Regional Growth Centres in the Sustainable and Compact Settlements, Guidelines for Planning Authorities. This would provide for a population increase of approximately 6,000 – 7,000 people.

This additional zoning does not appear to be realistic nor reasoned, based on the current demographic growth trajectory of Sligo Town, with the Town currently delivering approximately 30% of the housing / population ambition set out in the RSES, which is borne out in the highlighted statistics around housing completions, and which is commented upon

in the concluding comments of the RSES 2 Year Monitoring & Implementation Report (published by the Assembly in 2022).

This approach is not supported by the Assembly on the following grounds:

- It is inconsistent with the Core Strategy of the Draft Plan and an appropriate rationale has not been provided, contrary to the provisions of the Development Plan Guidelines for Planning Authorities, 2022.
- The additional zonings are not supported by an evidence-based approach, and are peripheral in nature, with 36ha. of proposed zoning nRES outside the current Sligo Town Boundary and negating the objective to deliver compact settlements of scale as set out in the RSES. The proposed Amendments fail to apply the sequential approach to development to support the sustainable compact growth of the town and its environs.
- PAZ 13 represents 27.08ha. rezoning of SLR (Strategic Land Reserve) to nRES, which although within the Town Boundary, is considered peripheral to the town built up area and would constitute leapfrogging and contrary to the objective to deliver compact development.
- The proposed amendments represent a significant departure from the RSES RPOs for Sligo Town and in particular RPO 3.7.37, which sets an ambition for Sligo to grow to a population of 27,200 by 2040.
- The implication of the Proposed Amendments has not been clearly considered within the context of the Local Transport Plan. They do not support the principle of delivering integrated land use and transport planning that will enable increased travel by sustainable transport modes and a reduction in in greenhouse gas emissions.

PAZ – 10: This proposed amendment provides for an increase of approx. 1.96ha. of **BIE (Business Industry and Employment)** zoned land outside and at a remove from the zoned boundary area of the Town.

The Assembly submission to the Draft Plan stated: *‘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’.* It further stated: *‘The Plan may benefit with the inclusion of a policy objective to actively pursue the servicing of these lands with Uisce Éireann, the relevant roads authority and/or relevant service/infrastructure provider.’*

The proposed amendment PAZ-10 has not included a rationale for the requirement to zone additional lands based on population, economic or employment growth over the lifetime of the development plan. Furthermore, a rationale for the zoning the selected lands over alternative lands, including but not limited to lands at Ballytivnan and Rathbraughan, as previously referenced in the Assembly Submission to the Draft Plan, has not been provided. This approach is not consistent with Chapter 6.2.5 of the Development Plan Guidelines for Planning Authorities 2022, and is not consistent with the RSES.

CONCLUSION

Overall, the Draft Sligo Plan displays a high degree of consistency with the RSES.

The ambitions of the Plan in the areas such as Village and Urban Renewal, as well as Tourism, Brownfield development, Student Accommodation and serviced sites show alignment with Regional Policy.

However, as outlined above the zoning proposed under PAZ 9-15 for Sligo Town represents a significant departure from the growth targets set out in the Regional Growth Centre Strategic Plan for Sligo as set out in the RSES, which were ambitious. Moreover, it would not appear to be an achievable objective, based on the current growth trajectory of Housing Unit completion in Sligo Town (2020, 2021 & 2022).

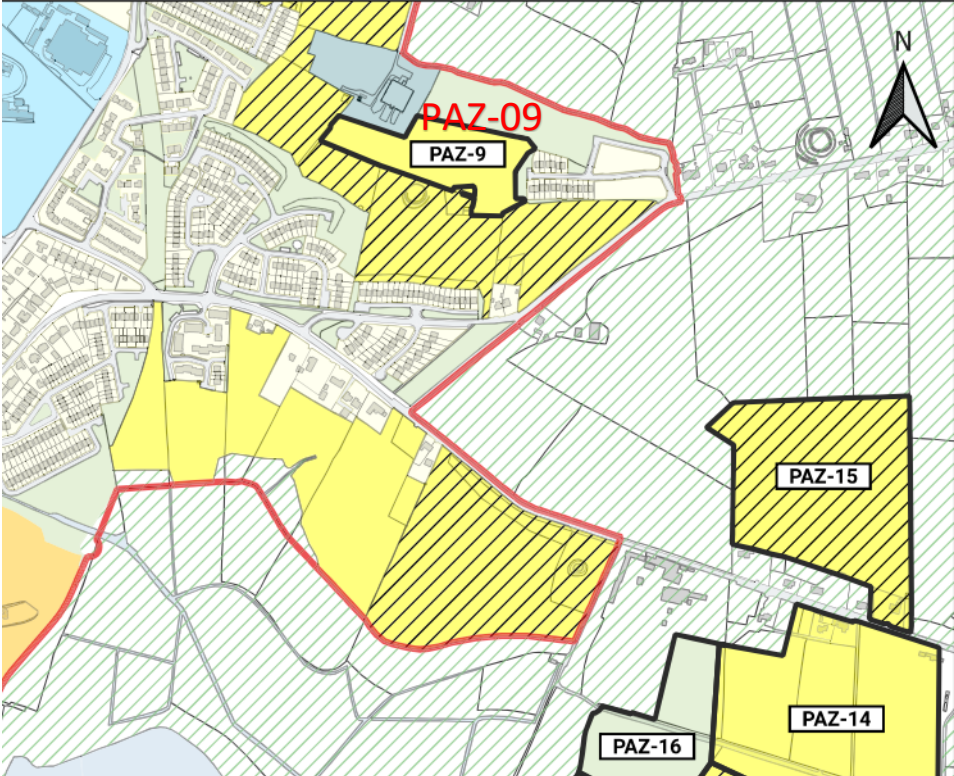
I trust that the above is of assistance and the Assembly wish to thank Sligo County Council for the opportunity given to provide this submission. If you have any queries in respect of the above, then do not hesitate to revert.

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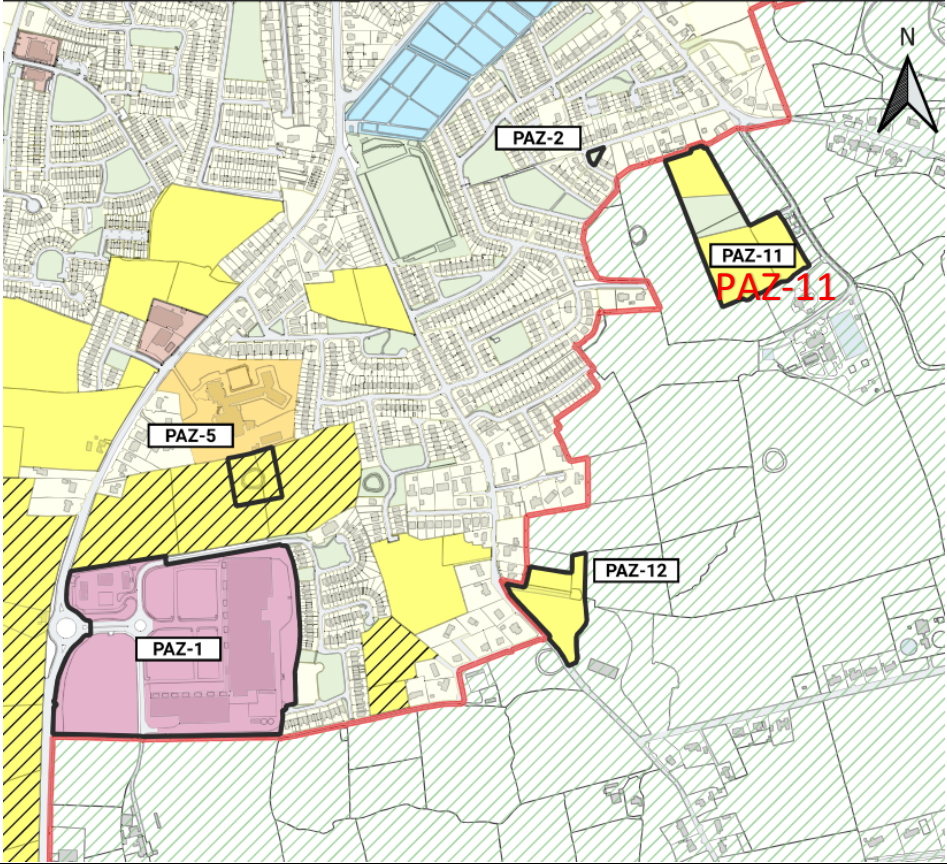


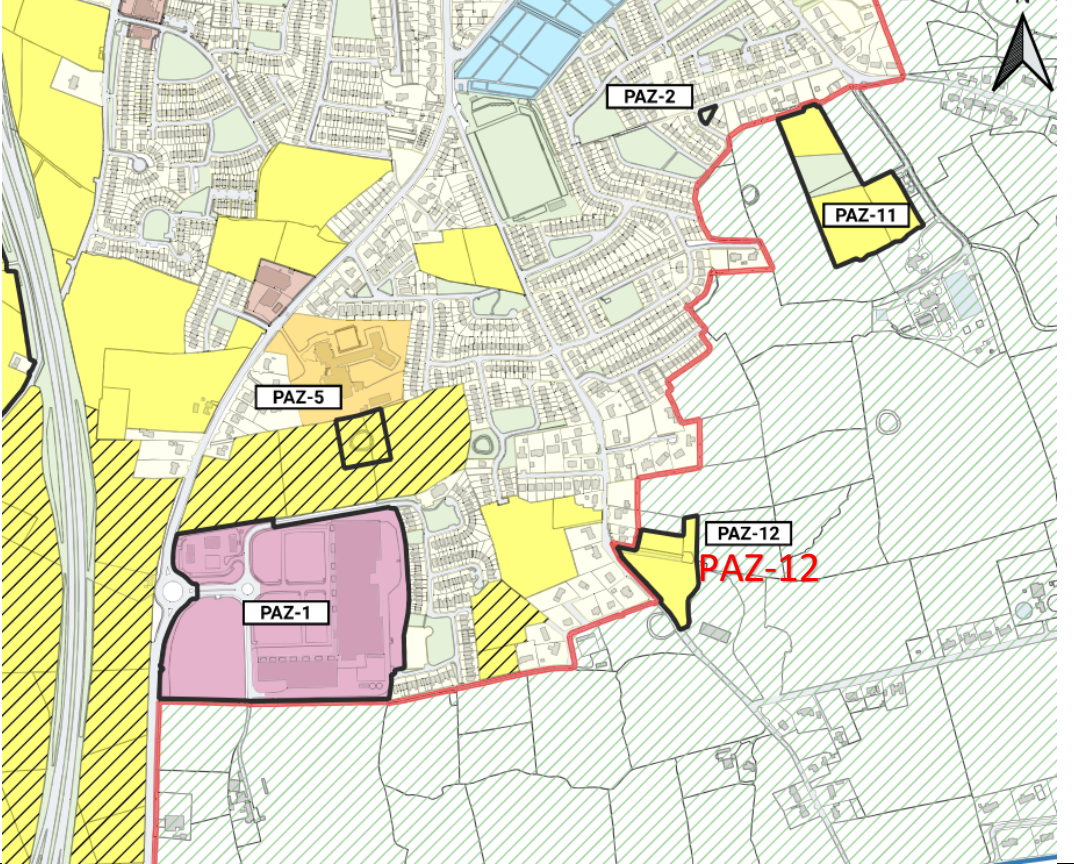
Denis Kelly
Director

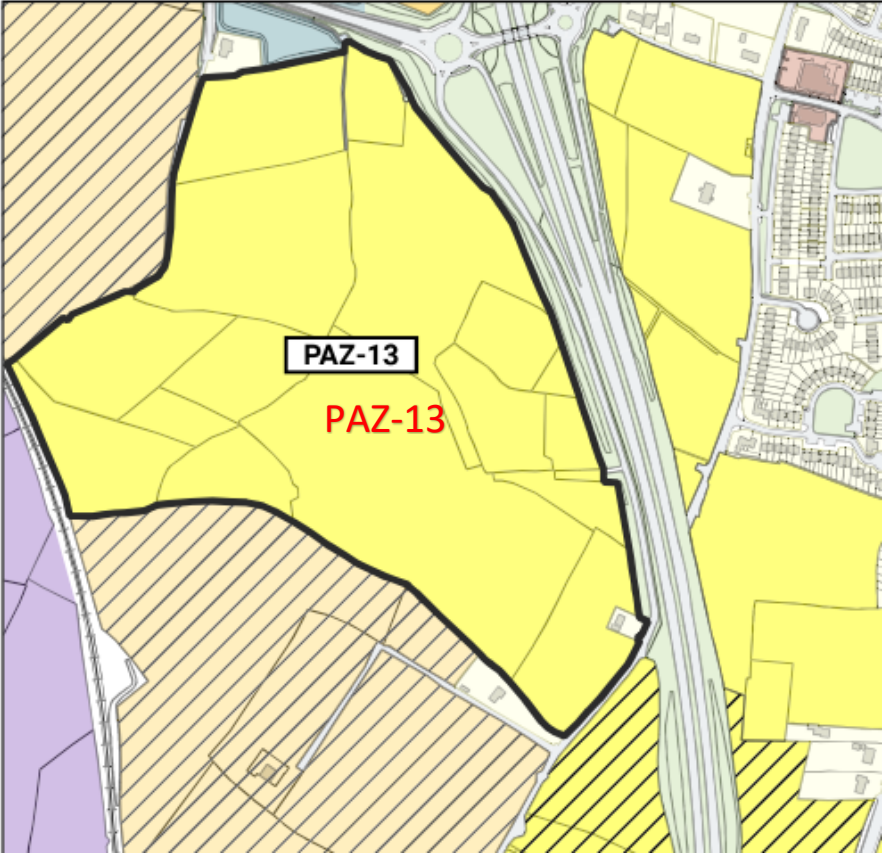
Appendix I - PAZ Zoning Maps relevant to NWRA Report on MA Sligo CDP - June 2024

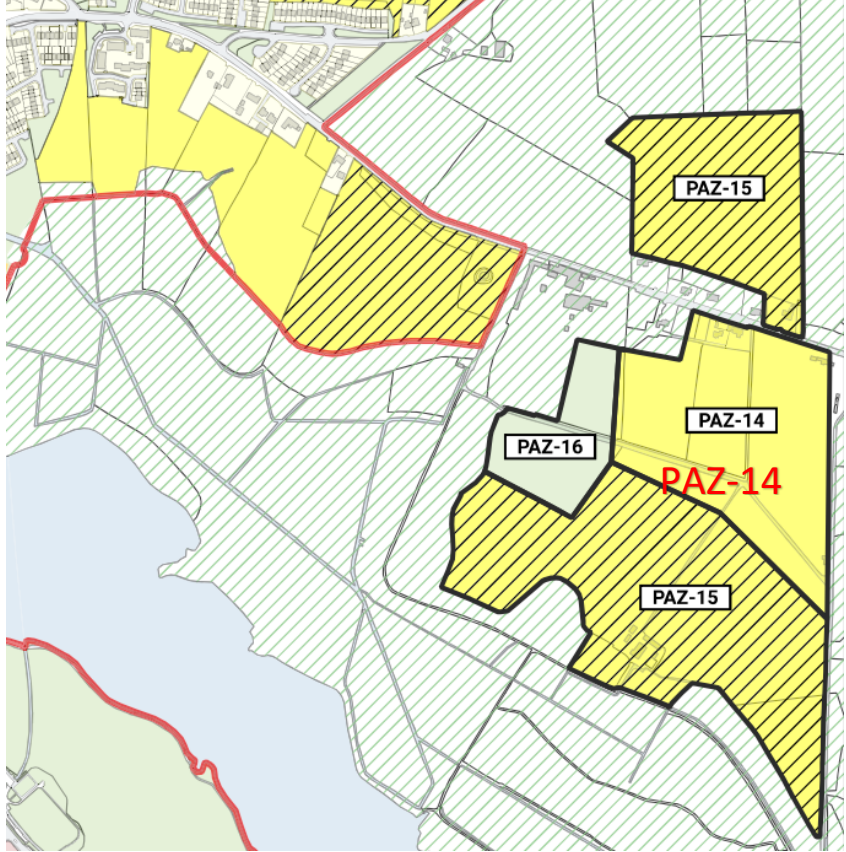
<p>PAZ 09</p>	
	<ul style="list-style-type: none"> - Proposed Amendment: 2.48 ha. to nRES from SLR - Serviced Site (28) as per Sligo Town Draft Infrastructural Map (Tier 1) - Inside Town Boundary but peripheral. - Inappropriate zoning at this location

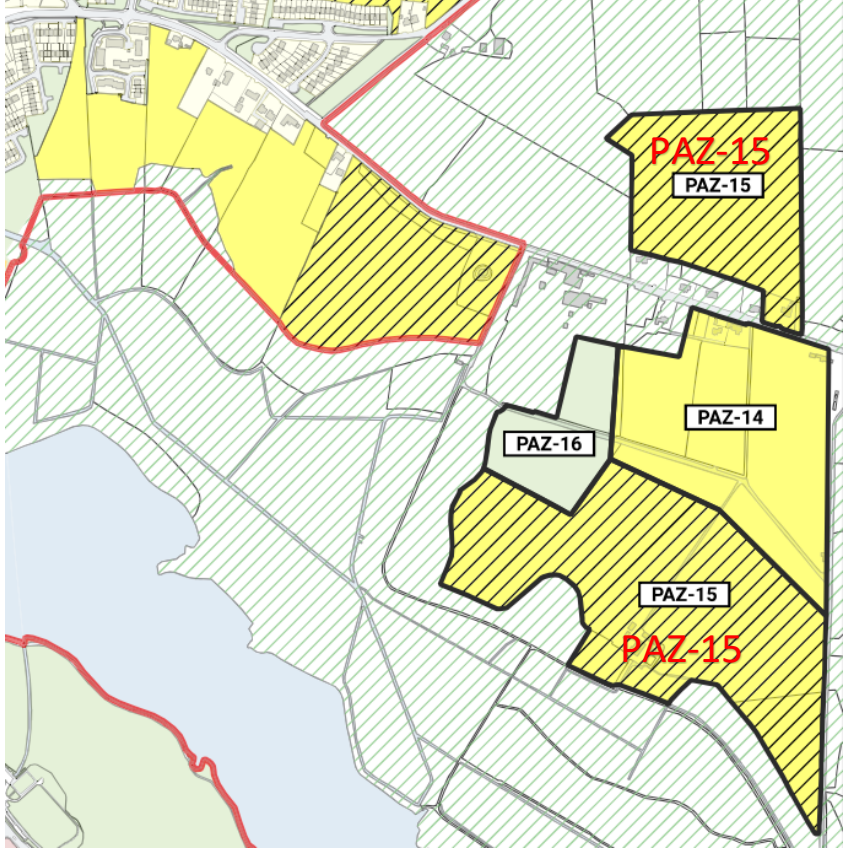
<p>PAZ-10</p>	
	<ul style="list-style-type: none"> - Proposed Amendment:1.96ha. to BIE from Unzoned. - Not Fully Serviced (Site 55) as per Sligo Town Draft Infrastructural Map - Outside the town boundary. - Inappropriate zoning at this location
	<p>NWRA Draft Plan Submission recommends lands at Ballytivnan and Rathbraughan should be prioritised for service provision/development to assist in complying with RPO 3.7.53</p>

<p>PAZ 11</p>	
	<ul style="list-style-type: none"> - Proposed Amendment: 2.46 ha. to nRES from GB - Not serviced as per Sligo Town Draft Infrastructural Map - Outside town zoning boundary / peripheral - Inappropriate zoning at this location

<p>PAZ 12</p>	
	<ul style="list-style-type: none"> - Proposed Amendment:1.4ha.to nRES from GB - Not serviced as per Sligo Town Draft Infrastructural Map - Outside town plan Zoning boundary / peripheral - Inappropriate zoning at this location

<p>PAZ 13</p>	
	<ul style="list-style-type: none"> - Proposed Amendment: 27.08ha. to nRES from SLP - Serviced as per Sligo Town Draft Infrastructural (Map Site no. 22) Tier 1 - Inside town zoning boundary - Proximity to major junction / TII response NB - Inappropriate zoning at this location

<p>PAZ 14</p>	
	<ul style="list-style-type: none"> - Proposed Amendment:10.26ha.to nRES from GB - Not Fully Serviced (Site 44) as per Sligo Town Draft Infrastructural Map - Outside the town Boundary - Inappropriate zoning at this location

<p>PAZ 15</p>	
	<p>Proposed Amendment: 23.19 ha. to nRES from SLR Not Fully Served (Site 44 & 45) as per Sligo Town Draft Infrastructural Map Outside the town Boundary Inappropriate zoning at this location</p>