



Sligo County Council
Comhairle Chontae Shligigh

Sligo.

Chief Executive's Report

on submissions received in relation to the

Draft Variation No. 1

of Sligo CDP 2024-2030

Alignment with the "NPF Implementation:
Housing Growth Requirements"

(Guidelines for Planning Authorities issued in July 2025 under
Section 28 of the Planning and Development Act, 2000, as amended)

and rezoning of two sites
following determinations on RZLT submissions

Sligo County Council
**Development
Planning Unit**

24 April 2026

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1. Introduction

The main purpose of the Draft Variation No. 1 of the Sligo County Development Plan 2024-2030 (CDP) is to align the Plan with Ministerial Guidelines issued in 2025 in accordance with Section 28 of the Planning and Development Act 2000 (as amended), i.e. the *“National Planning Framework (NPF) Implementation: Housing Growth Requirements Guidelines for Planning Authorities”* (HGR Guidelines).

The requirement to carry out this variation arises from the letter (dated 30 July 2025) sent by the Minister of State for Local Government and Planning, John Cummins, to the Chief Executive of Sligo County Council. The Minister of State indicated that *“there is now an urgent need for development plans to be updated to reflect the requirements of the recently approved Revised NPF in respect of housing”* and requested that *“planning authorities use all available means to incorporate new housing growth requirements within development plans as quickly as possible”*, prioritising the updating of county development plans to reflect the requirements of the Guidelines.

1.1 Public consultation

The Draft Variation was subject to public consultation from 6 February 2026 to 6 March 2026 (four weeks). The documents were made available for viewing and download from the County Council’s website at <https://www.sligococo.ie/cdp/DraftVariationNo1/>.

The Draft Variation and accompanying documents were published on the Council’s Consultation Portal (<https://consult.sligococo.ie/en/consultation/draft-variation-no-1-sligo-cdp-2024-2030>), which facilitates both the making of submissions and the viewing of other persons’ or state bodies’ submissions.

In total, seventy-four (74) submissions were received during the consultation period, of which one was withdrawn. There were nine (9) submissions from prescribed bodies, one from a non-prescribed state company, 59 from individuals or their representing consultants, and four (4) from non-state organisations.

No submissions were received from the Minister for Housing, Local Government and Heritage or from the Northern and Western Regional Assembly (NWRA).

1.2 Chief Executive’s Report – statutory framework

Section 58(11) of the Planning and Development Act 2024 (as amended) requires the Chief Executive of a Planning Authority to prepare a report on submissions received on foot of the notice of Draft Variation and submit it to the Elected Members for their consideration.

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

- a. list the entities or persons who made submissions;
- b. provide a summary of the following:
 - the “recommendations and submissions” made by the Minister for Housing, Local Government and Heritage,
 - the “recommendations and submissions” made by the Office of the Planning Regulator,

- the submissions made by the Northern and Western Regional Assembly and by the National Transport Authority,
 - the submissions made by any other persons (the report may group and summarise the issues raised in different submissions on a thematic basis);
- c. give the response of the Chief Executive to the issues raised, taking account of the proper planning and sustainable development of the area, the statutory obligations of the Planning Authority and any relevant policies or objectives for the time being of the Government or of any Minister of the Government.
- d. set out the recommendations of the Chief Executive as to how any recommendations made by the Minister and the Office of the Planning Regulator should be dealt with.

1.3 Structure of this Report

The **Chief Executive's Report** has been drafted in accordance with the provisions of Section 58(11) of the Planning and Development Act 2024, as detailed above.

The Chief Executive addresses the majority of submissions – other than those received from prescribe bodies – by thematic group (settlement), summarising the relevant issues and responding to each issue (not to each submission).

Section 2 contains the **List of persons and organisations that made submissions on the Draft Variation**.

Section 3 of this report contains:

- the summary of the submission – including the observation and advice – received from the **Office of the Planning Regulator** (Submission 20), together with the Chief Executive's response and recommendation;
- the summary of the submission made by the **National Transport Authority** (Submission 10), followed by the Chief Executive's response and recommendation;
- individual summaries of the submissions received from the other seven (7) prescribed bodies, together with the corresponding Chief Executive's responses and recommendations;

Section 4 of this report summarises the only submission which focused entirely on modifications to the policy P-SLR-2 (Part III of the Draft Variation).

Section 5 presents the summary of issues raised in the **forty-eight (48) submissions received in relation to Strandhill**. The Chief Executive's response and recommendations are included after each issue.

Section 6 summarises the issues raised in the **eight (8) submissions received in relation to Sligo Town**, followed by the Chief Executive's response and recommendations.

Section 7 consists of summaries of issues arising from **the five (5) submissions relating to other settlements, i.e. Ballincar, Ballymote, Grange and Ballygawley**, together with the Chief Executive's response and recommendations.

Section 8 summarises the remaining **two (2) submissions** that do not refer to any element of the Draft Variation. The Chief Executive's response and recommendations follow.

Section 9 contains the overall recommendation of the Chief Executive as well as corrections to the Infrastructure Assessment status of one site and the Settlement Capacity Audit score of another site.

1.4 The role of the Elected Members

Deciding whether to make the Variation, with or without modifications, is a function reserved for the Elected Members of Sligo County Council. Following the receipt of this Chief Executive's Report, the Members have up to six (6) weeks to make a decision regarding the Draft Variation.

On foot of the submissions received, the Chief Executive has recommended two modifications, none of which represents a material (i.e. significant) alteration.

If the Members decide – by resolution – that any material alterations should be made to the Draft Variation, the resulting proposed amendments must be subject to a further (final) round of public consultation.

At this stage, the Members are required to consider the Draft Variation No. 1 of the CDP and the recommendations contained in the Chief Executive's Report.

Section 58(12) of the Planning and Development Act 2024 (as amended) indicates the following:

- “(c) Where, following the consideration of the proposed variation and the chief executive's report, it appears to the members of the planning authority that the proposed variation should be made, they may, subject to paragraph (d), by resolution make the proposed variation,*
- (d) Where, following the consideration of the proposed variation and the chief executive's report, it appears to the members of the authority that a modified version of the proposed variation should be made, they may, subject to subsection (13), by resolution make a modified version of the proposed variation.*
- (e) Where, in making the proposed variation under paragraph (c) or a modified version of the proposed variation under paragraph (d), the members of the authority do not comply with any recommendation made by the Minister or Office of the Planning Regulator under this section, they shall, as soon as practicable following the making of the variation, so inform the Minister, or the Office of the Planning Regulator, as the case may be, by notice in writing which notice shall contain a statement of the reasons for the decision not to comply with the recommendation concerned.”*

1.5 What happens next?

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

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

Determination of requirement for SEA and AA

Section 58(13)(b)&(c) of the Planning and Development Act 2024 (as amended) indicates that the Planning Authority must determine whether a strategic environmental assessment and an appropriate assessment are required to be carried out in respect of the proposed material alterations of the Draft Variation.

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

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

Environmental assessment of the Proposed Amendments

The Development Planning Unit will ensure that the relevant assessments are carried out in respect of the amendments subject to resolutions passed by the elected members.

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

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

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

Publication of the Proposed Amendments

The Proposed Amendments and any additional environmental reports must be placed on public display for a period of minimum four (4) weeks.

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

After considering the proposed amendments and the Chief Executive's recommendations on the issues raised during the last phase of consultation, the Members will adopt the Variation, which will become operational immediately.

Sligo County Council must adhere to the statutory process set out in the Planning and Development Act 2024 (as amended). A summary of this process is provided below. Stages that have been completed are indicated in *blue italics* and stages that directly involve the Elected Members are indicated in **green type**.

Development Plan Variation process

1. *Give notice of Draft Variation to the public and the prescribed bodies (6 February 2026)*
2. *Public consultation (6 February to 6 March 2026)*
3. ***Chief Executive's Report on submissions and observations submitted to Members on 24 April 2026***
4. **Consideration of the Draft Variation and the Chief Executive's Report by the Elected Members (by 15 May 2026)**
5. **Members may wish to amend the Draft Variation OR accept the Chief Executive's recommendations and make the Variation without amendments**
6. If the proposed amendments are a material alteration of the Draft Variation, publish notice (additional time will be required for carrying out SEA and AA of the proposed amendments, where required)
7. Put the proposed amendments on public display and invite submissions (minimum four weeks)
8. Final Chief Executive's Report submitted to Members for consideration
9. **Members make the Variation with or without the proposed amendments.**
10. The Variation becomes operational immediately.

2. List of persons and organisations that made submissions on the Draft Variation No. 1 of Sligo County Development Plan 2024-2030

The public consultation commenced on 6 February 2026 and ended on 6 March 2026. From a total of 74 submissions were received during this period, one was withdrawn by the author.

Submissions received from prescribed bodies are highlighted in pale yellow in the table below. The links provided in the last column lead to Sligo County Council's Consultation Portal, where the full text of submissions continues to be available.

Ref. no.	Date received	Name of person who signed the submission	On behalf of (where applicable)	Link to Consultation Portal
1	10 February	Geoff Hynes Inspector, COMAH, Chemical Production & Storage (CCPS)	Health and Safety Authority	https://consult.sligococo.ie/en/submission/slg-c79-1
2	16 February	Aine Nic Amhlaidh	n/a	https://consult.sligococo.ie/en/submission/slg-c79-2
3	24 February	Michael McCormack Senior Land Use Planner	Transport Infrastructure Ireland (TII)	https://consult.sligococo.ie/en/submission/slg-c79-3
4	25 February	Susan Mahon Marine Planning Advisor, MUL & Planning Advisory Directorate	Maritime Area Regulatory Authority (MARA)	https://consult.sligococo.ie/en/submission/slg-c79-4
5	27 February	Dr. Rosaria Marron Chairperson, Board of Management	Scoil Asicus Naofa, Strandhill	https://consult.sligococo.ie/en/submission/slg-c79-5
6	1 March	David Cullen	n/a	https://consult.sligococo.ie/en/submission/slg-c79-6
7	2 March	Aonghus Collins	n/a	https://consult.sligococo.ie/en/submission/slg-c79-7
8	2 March	Imelda Gilroy	Glenina Partnership	https://consult.sligococo.ie/en/submission/slg-c79-8
9	3 March	Mairead Garry Statutory Plans Forward Planning & Site Acquisition Section	Department of Education and Youth	https://consult.sligococo.ie/en/submission/slg-c79-9
10	3 March	Eoin Farrell Senior Land Use and Transport Planner	National Transport Authority (NTA)	https://consult.sligococo.ie/en/submission/slg-c79-10

Ref. no.	Date received	Name of person who signed the submission	On behalf of (where applicable)	Link to Consultation Portal
11	3 March	Aine Nic Amhlaidh	n/a	https://consult.sligococo.ie/en/su bmission/slg-c79-11
12	4 March	Aine Nic Amhlaidh	n/a	https://consult.sligococo.ie/en/su bmission/slg-c79-12
13	5 March	Patrick Coen	n/a	https://consult.sligococo.ie/en/su bmission/slg-c79-13
14	5 March	Richard Mullin Harcourt Architects	Michael Connolly	https://consult.sligococo.ie/en/su bmission/slg-c79-14
15	5 March	Robert Keran Foundation Management Consultants Ltd.	McEniffs (Bundoran) Ltd.	https://consult.sligococo.ie/en/su bmission/slg-c79-15
16	5 March	Tom Cafferkey	n/a	https://consult.sligococo.ie/en/su bmission/slg-c79-16
17	5 March	Robert Keran Foundation Management Consultants Ltd.	Lewis and Niall Rhatigan	https://consult.sligococo.ie/en/su bmission/slg-c79-17
18	5 March	Quenshsolutions Ltd	n/a	https://consult.sligococo.ie/en/su bmission/slg-c79-18
19	5 March	Alan O Kelly	n/a	https://consult.sligococo.ie/en/su bmission/slg-c79-19
20	5 March	Anne Marie O'Connor Deputy Regulator and Director of Plans Evaluation	Office of the Planning Regulator (OPR)	https://consult.sligococo.ie/en/su bmission/slg-c79-20
21	5 March	Edmund McDonnell	n/a	https://consult.sligococo.ie/en/su bmission/slg-c79-21
22	5 March	Ken Russell	n/a	https://consult.sligococo.ie/en/su bmission/slg-c79-22
23	5 March	Linda Sherlock	n/a	https://consult.sligococo.ie/en/su bmission/slg-c79-23
24	5 March	John Tuohy	n/a	https://consult.sligococo.ie/en/su bmission/slg-c79-24
25	5 March	Ronan Keane	n/a	https://consult.sligococo.ie/en/su bmission/slg-c79-25
26	5 March	No name provided	Strandhill Community Development Association	https://consult.sligococo.ie/en/su bmission/slg-c79-26
27	5 March	Aine Nic Amhlaidh	n/a	https://consult.sligococo.ie/en/su bmission/slg-c79-27

Ref. no.	Date received	Name of person who signed the submission	On behalf of (where applicable)	Link to Consultation Portal
28	5 March	Pat Ryan	n/a	https://consult.sligococo.ie/en/submission/slg-c79-28
29	6 March	Aine Nic Amhlaidh	n/a	https://consult.sligococo.ie/en/submission/slg-c79-29
30	6 March	John Deane	n/a	https://consult.sligococo.ie/en/submission/slg-c79-30
31	6 March	Sheila Convery Forward Planning Team, Asset Strategy	Uisce Éireann (Irish Water)	https://consult.sligococo.ie/en/submission/slg-c79-31
32	6 March	Alan Parkinson	n/a	https://consult.sligococo.ie/en/submission/slg-c79-32
33	6 March	Conor Galvin Flood Risk Management, Climate Adaptation and Strategic Assessments	Office of Public Works (OPW)	https://consult.sligococo.ie/en/submission/slg-c79-33
34	6 March	Sinead O'Sullivan	n/a	https://consult.sligococo.ie/en/submission/slg-c79-34
35	6 March	Fintan Morrin Principal, The Planning Partnership	Sligo Business Park Limited	https://consult.sligococo.ie/en/submission/slg-c79-35
36	6 March	Christopher Heffernan	n/a	https://consult.sligococo.ie/en/submission/slg-c79-36
37	6 March	Ronan Smyth	n/a	https://consult.sligococo.ie/en/submission/slg-c79-37
38	6 March	Aine O'Chionnagh	n/a	https://consult.sligococo.ie/en/submission/slg-c79-38
39	6 March	Colin Reddington	n/a	https://consult.sligococo.ie/en/submission/slg-c79-39
40	6 March	Francis Clancy	n/a	https://consult.sligococo.ie/en/submission/slg-c79-40
41	6 March	Prithvi Gowda Lingaraju Assistant Planner, Cunnane Stratton Reynolds Land Planning & Design	Ken and Natasha Gallagher	https://consult.sligococo.ie/en/submission/slg-c79-41
42	6 March	Leane Mulvey	n/a	https://consult.sligococo.ie/en/submission/slg-c79-42
43	6 March	Louise O'Leary McCutcheon Halley Planning Consultants	Margaret and Walter Burke	https://consult.sligococo.ie/en/submission/slg-c79-43

Ref. no.	Date received	Name of person who signed the submission	On behalf of (where applicable)	Link to Consultation Portal
44	6 March	David Parke	n/a	https://consult.sligococo.ie/en/su bmission/slg-c79-44
45	6 March	Brian Collery	n/a	https://consult.sligococo.ie/en/su bmission/slg-c79-45
46	6 March	Niamh McDermott	n/a	https://consult.sligococo.ie/en/su bmission/slg-c79-46
47	6 March	Hilary McPartland	n/a	https://consult.sligococo.ie/en/su bmission/slg-c79-47
48	6 March	Niamh Gethin	n/a	https://consult.sligococo.ie/en/su bmission/slg-c79-48
49	6 March	Hazel Feeney	n/a	https://consult.sligococo.ie/en/su bmission/slg-c79-49
50	6 March	Regina O'Callaghan	n/a	https://consult.sligococo.ie/en/su bmission/slg-c79-50
51	6 March	Laura Dunleavy	n/a	https://consult.sligococo.ie/en/su bmission/slg-c79-51
52	6 March	Linda McEllin Brock McClure Planning & Development Consultants	Castle Dargan Resort Limited	https://consult.sligococo.ie/en/ submission/slg-c79-52
53	6 March	Beatrice Macdonald	n/a	https://consult.sligococo.ie/en/su bmission/slg-c79-53
54	6 March	Colette Mavrak	n/a	https://consult.sligococo.ie/en/su bmission/slg-c79-54
55	6 March	Proinsias Gallagher	n/a	https://consult.sligococo.ie/en/su bmission/slg-c79-55
56	6 March	John Sheridan	n/a	https://consult.sligococo.ie/en/su bmission/slg-c79-56
57	6 March	Sinéad Mc Loughlin	n/a	https://consult.sligococo.ie/en/su bmission/slg-c79-57
58	6 March	Rose B Johnson	n/a	https://consult.sligococo.ie/en/su bmission/slg-c79-58
59	6 March	Sean O'Flynn	n/a	https://consult.sligococo.ie/en/su bmission/slg-c79-59
60	6 March	Julie Gallagher	n/a	https://consult.sligococo.ie/en/su bmission/slg-c79-60

Ref. no.	Date received	Name of person who signed the submission	On behalf of (where applicable)	Link to Consultation Portal
61	6 March	Mary Considine Chief Executive	Iarnród Éireann	https://consult.sligococo.ie/en/su_bmission/slg-c79-61
62	6 March	Robert Keran Foundation Management Consultants Ltd.	Beldare Homes	https://consult.sligococo.ie/en/su_bmission/slg-c79-62
63	6 March	Keith O'Brien Spatial Planner Group Property Engineering & Major Projects	ESB	https://consult.sligococo.ie/en/su_bmission/slg-c79-63
64	6 March	Stephanie Galwey	n/a	https://consult.sligococo.ie/en/su_bmission/slg-c79-64
65	6 March	Dominic Galwey	n/a	https://consult.sligococo.ie/en/su_bmission/slg-c79-65
66	6 March	Mary Quinn	n/a	https://consult.sligococo.ie/en/su_bmission/slg-c79-66
67	6 March	Melissa McGinley Senior Planner, MKO	Novot Holdings Ltd.	https://consult.sligococo.ie/en/su_bmission/slg-c79-67
68	6 March	Doreen Deane	n/a	https://consult.sligococo.ie/en/su_bmission/slg-c79-68
69	6 March	Henrietta Veale (Quinn)	n/a	https://consult.sligococo.ie/en/su_bmission/slg-c79-69
70	6 March	David Kiely Chairperson	Strandhill Golf Club	https://consult.sligococo.ie/en/su_bmission/slg-c79-70
71	6 March	---	---	WITHDRAWN on 9 March
72	6 March	Seamus O Domhnaill Michael Friel Architects & Surveyors	Eunan Friel	https://consult.sligococo.ie/en/su_bmission/slg-c79-72
73	6 March	Aine Nic Amhlaidh	n/a	https://consult.sligococo.ie/en/su_bmission/slg-c79-73
74	6 March	Alice Lindsay Chairperson	Parish Pastoral Council, St. Patrick's Church	https://consult.sligococo.ie/en/su_bmission/slg-c79-74

3. Submissions from prescribed bodies

A total of nine submissions were received from prescribed bodies in respect of the Draft Variation No. 1. The most substantive submission, from the Office of the Planning Regulator (OPR), makes a single Observation relating to a clarification of the housing growth narrative in Part I of the Draft Variation. Having considered this observation, the Chief Executive recommends minor, non-material modifications to Part I of the Draft Variation to provide additional clarity and ensure full consistency with the Housing Growth Requirements Guidelines. No recommendations for change are made on foot of the other eight submissions from prescribed bodies.

3.1 Office of the Planning Regulator (Submission 20)

Summary of submission: The OPR confirms that it is satisfied with the overall intent and approach of Draft Variation No. 1 and that the proposed amendments to the Strategic Land Reserve policy framework and to the narrative of Section 3.1.3 are consistent with national policy, subject to one observation. The details are presented below.

3.1.1 Framework for assessing the Draft Variation

The Office of the Planning Regulator (OPR) acknowledges receipt of the Draft Variation No. 1. The OPR notes that its statutory role under Part 3 of the Planning and Development Act 2024, and specifically under Section 546 and Section 58, requires it to:

- evaluate the Draft Variation for consistency with legislative requirements;
- ensure alignment with national and regional policy;
- issue **recommendations** where there are clear breaches requiring correction;
- issue **observations** where clarification or adjustment is required;
- provide **advice** to support proper planning and sustainable development.

Planning Authorities are requested to:

- implement or address recommendation(s) made by the Office in order to ensure consistency with the relevant policy and legislative provisions;
- action an observation made by the Office;
- give full consideration to the advice contained in a submission made by the Office.

Upon adoption of the Variation, the OPR will assess it in accordance with the statutory framework in section 63 of the Act.

The OPR notes that Sligo plays a significant role in regional housing delivery, with a strong record in permissions and completions, and that the Draft Variation proposes to:

- implement the Housing Growth Requirements (2025) Guidelines;
- amend the policy framework relating to Strategic Land Reserve (SLR);
- enable serviced SLR lands to be put forward for consideration through the development management process, where housing is deliverable during the lifetime of the Plan;
- rezone two sites arising from the RZLT 2026 determinations.

The OPR confirms that it has assessed the Draft Variation's approach to housing supply and land release in light of:

- the *NPF Implementation: Housing Growth Requirements* (2025) (Section 28 Guidelines);
- the *Sustainable Residential Development and Compact Settlements Guidelines* (2024);
- the *Development Plans Guidelines* (2022);
- relevant EU Directives (SEA, Habitats, Birds, Floods).

3.1.2 Findings on housing supply capacity

The OPR notes that:

- the housing growth requirement for County Sligo is **672 units per annum**, equating to **3,360 units** over five years, i.e. to the end of the Plan period (2030);
- with the maximum 50% uplift, the total provision should be **5,040 units**;
- there is a "stay" on 55.03 ha of land pending the outcome of the Draft Ministerial Direction;
- 150 ha of lands zoned for residential and mixed uses (excluding lands under "stay") have capacity for **4,304 units**;
- the Draft Variation proposes that **218 ha of SLR lands** could be brought forward for residential development, under an amended SLR policy framework, providing capacity for **6,783 additional units**.

Thus, the CDP – as varied – would allow capacity for roughly **11,087 units** to 2030, substantially more than the requirements of the HGR Guidelines.

The OPR also notes that the SLR lands were recently assessed during the CDP review process and remain consistent with the principles of compact growth and sequential development.

3.1.3 OPR conclusion on the overall approach

The OPR states:

"Accordingly, having regard to the above considerations, the Office is satisfied with the proposed Variation"

3.1.4 OPR observation – required action

The OPR makes **one Observation** (not a Recommendation), as follows:

Observation 1 - Housing Growth Requirements
Having regard to the NPF Implementation: Housing Growth Requirements (2025) (Housing Growth Guidelines), the Planning Authority is advised to amend the text of section 3.1.3 of the proposed Variation as follows: (i) amend the second paragraph so that it reflects that the figure of 672 relates to the per annum Housing Growth Requirement for Sligo for each year up to and including 2030 (i.e. five full years); and (ii) amend the third paragraph so that it reads that sufficient lands are zoned to provide for up to 50% additional housing units over and above the Housing Growth Requirements.

3.1.5 Procedural reminders

The OPR reiterates the legal obligations of the Planning Authority:

- The Chief Executive's Report (prepared for the Elected Members under Section 58(11) of the Act) must address the Office's observation and explain how the Chief Executive proposes it should be dealt with.
- Where the Planning Authority makes the Variation, it is required to notify the Office within one week of the decision to adopt the Variation.
- Where the Planning Authority decides *"not to comply with the recommendations of the Office, then it shall inform the Office as soon as practicable and provide reasons for the decision not to so comply"*.
- The Planning Authority is required to publish notice of the Variation within a week of the adoption, stating that a copy of the Development Plan, as varied, will be available for inspection on a website and at a place specified in the notice no later than five weeks after the date of adoption.

Chief Executive's opinion and recommendation

The OPR's overall assessment and conclusion statement – that the Office *"is satisfied with the proposed Variation"* – are welcome.

The procedural reminders are legal requirements and will be complied with.

The Observation No. 1 is noted and agreed. The Observation involves two clarifications to the proposed changes to the narrative of Section 3.1.3, to:

- explicitly state that the annual housing growth requirement of 672 units applies to each year from 2026 to 2030 inclusive (i.e. the remaining five years of the CDP period);

- clarify that the CDP zones sufficient lands to provide “*up to 50% additional housing units over and above the Housing Growth Requirements*”.

These are minor modifications, not material changes to narrative or policy. Such modifications would not alter zoning, settlement-specific housing allocations or policy direction, and can be incorporated without broadening the scope of the Variation.

Recommendation

In **Part I of the Draft Variation** (Replacement of Section 3.1.3 in Chapter 3), make minor modifications to the proposed replacement text, as follows:

text to be deleted ~~in blue double-strikethrough type,~~

text to be inserted **in bold, green, larger type.**

3.1.3 Consistency with national housing growth requirements

New guidance on the implementation of the NPF was published in July 2025 in the form of “*Housing Growth Requirements – Guidelines for Planning Authorities*” (HGR Guidelines). These are Section 28 Ministerial Guidelines in accordance with the Planning and Development Act 2000 (as amended).

The HGR Guidelines translate the national and regional projections contained in the NPF (First Revision 2025) to annual housing growth requirements for each county. The new annual housing growth requirement to ~~2034~~ **2030** for County Sligo is 672 units per year, i.e. ~~4,032~~ **3,360** units for the **remaining five-year** ~~six-year~~ life of the current Development Plan.

It is a *Policy and Objective* of the HGR Guidelines that an additional provision of up to 50% be incorporated into the Development Plan over and above the new housing requirement for the Plan period. Applying the full 50% additional provision to the housing requirement for County Sligo results in an annual housing requirement of 1,008 units, i.e. ~~6,048~~ **5,040** units over ~~six~~ **five years, from 2026 to 2030.**

Taking account of the housing capacity of lands zoned for residential and mixed uses, together with the full extent of the Strategic Land Reserve, the County Development Plan (as varied) zones sufficient land to accommodate the housing growth requirements (inclusive of the 50% additional provision) over its lifetime to 2030.

3.2 National Transport Authority (Submission 10)

3.2.1 Infrastructure Assessment and Settlement Capacity Audit scores of Strategic Land Reserve sites

Summary of issue: The NTA notes that the assessment in the Appendix refers to 'Access to Public Road(s)' and 'Footpath present' by way of the assessment of transport. It is the view of the NTA that this does not adequately address the requirements of the 'Settlement Capacity Audit' as set out in the Housing Growth Requirements Guidelines for Planning Authorities (2025) and Development Plan Guidelines for Planning Authorities (2022).

The NTA recommends that the Infrastructure Assessment and Settlement Capacity Audit scores of Strategic Land Reserve sites should be amended *"to adequately meet the requirements of a 'Settlement Capacity Audit' as set out in the Section 28 Guidelines for Housing Growth. In this regard it should 'highlight infrastructural requirements' and 'specify 'enabling infrastructure' for all transport modes for each of the residential zoned sites"*. Such transport modes include *"cycling and public transport requirements"*.

For Sligo Town, *"revisions to the Appendix should be informed and led by the transport measures set out in Sligo LTP"*.

Chief Executive's opinion: The planning authority notes the NTA's comments regarding the Infrastructure Assessment and Settlement Capacity Audits of sites that might become eligible for development if the Variation is adopted in its current form.

However, the scope of Variation No. 1 is deliberately narrow and is confined to incorporating updated housing targets and amending Strategic Land Reserve policies.

The Draft Variation does not zone any additional lands, nor does it amend the IA/SCA of sites already included within the Development Limits of settlements. The purpose of the IA/SCA appendix is to present the existing IA/SCA results that informed the CDP.

Both the CDP and the accompanying LTP were prepared in consultation with the NTA. At no stage of consultation did the NTA comment on the IA and SCA of zoned lands.

Any recalibration, expansion or methodological revision of the IA or SCA – particularly in relation to sustainable mobility, public transport capacity, or LTP alignment – will be carried out as part of the next review of the Development Plan, due to commence in 2028.

Recommendation: No modification to the Variation is required.

3.2.2 Sligo Town and the Local Transport Plan

Summary of issue: The NTA notes that several zoned or SLR lands in Sligo Town – e.g. PAZ-9, PAZ-11, PAZ-12, PAZ-14, PAZ-15, PAZ-22, PAZ-23, and sites IA No. 24 and IA No. 28 – were not assessed in the Local Transport Plan.

The Authority recommends that the Council give further consideration *"to the transport required to serve the lands, to demonstrate that the sites can be served by sustainable modes of transport and will not be wholly car dependant"*.

Chief Executive's opinion: The Draft Variation does not create a new or expanded land use pattern that would result in car dependency. It simply allows for earlier activation of lands that are already zoned, subject to strict conditions.

All the PAZ sites mentioned in the submission have existing road access, which is sufficient for determining their eligibility for development under this Variation.

Public transport in Sligo is provided via bus services, which the NTA, as the responsible transport authority, can modify, extend or re-route to serve new residential areas as they come forward.

As requirements for infrastructure provision change over time, the LTP may need to be updated, in consultation with the NTA, to ensure alignment with emerging development patterns.

Recommendation: No modification to the Variation is required.

3.3 Health and Safety Authority (Submission 1)

Summary: The Health & Safety Authority (HSA) acknowledges receipt of the Draft Variation No. 1 and provides its standard land use planning (LUP) guidance in relation to major accident hazard sites (COMAH/Seveso III establishments). The Authority states that it *"would expect the planning guidelines"* to contain:

- *"An indication of planning policy in relation to major accident hazard sites notified under the regulations, which reflects the intentions of Article 13 of Directive 2012/18/EU.*
- *The consultation distances and generic advice, where applicable, supplied by the Authority to Sligo County Council in relation to such sites. These distances to be indicated on the various maps included in the plan, as well as any more specific distances and advice supplied by the Authority .*
- *A policy on the siting of new major hazard establishments, taking account of Article 13 and the published policy of the Authority in relation to new developments, including developments in the vicinity of such establishments.*
- *Mention of the following notified establishments: Sazerac of Ireland ULC t/a Hawk's Rock Distillery, Carns, Sligo"*

The submission does not raise objections to the Draft Variation and does not request specific amendments to the Variation.

Chief Executive's opinion: The HSA made near-identical submissions during the public consultations stages which formed part the preparation of the CDP 2024-2030.

The adopted Development Plan contains adequate policies and includes a reference to Lough Gill Distillery (Hazelwood, Co. Sligo), which is part of the Sazerac Group. The current submission does not relate to the Draft Variation.

Recommendation: No modification to the Variation is required.

3.4 Transport Infrastructure Ireland (Submission 3)

Summary: TII reminds the Council of the issues “*pertaining where lands designated with a Strategic Land Reserve zoning objective adjoin the national road network at locations outside where reduced urban 50–60kph speed limit apply*”. It is stated that “*direct access or intensification of direct access to a national road in such circumstances conflicts directly with the provisions of official policy included in the Section 28 Ministerial Guidelines ‘Spatial Planning and National Roads Guidelines for Planning Authorities’ (DoECLG, 2012) as well as Sligo County Development Plan, 2024–2030 policy, notably Policy P-NR-1”*”.

The submission highlights a specific location: SLR lands on the north-eastern edge of Sligo Town, which adjoin the N-16 at a point where the speed limit transitions from 60 km/h to 100 km/h.

TII advises that any future access serving the SLR lands should be located within the 50–60 km/h urban speed limit zone, in order to comply with national policy and ensure road safety.

Chief Executive’s opinion: Access to the national road N-16 is a development management consideration in relation to any potential development proposal that may emerge on SLR lands located on the north-eastern side of Sligo Town. The Development Plan policies and standards on access to national roads are not affected by the Draft Variation No. 1.

The TII submission does not identify any conflict between the Draft Variation and national policy on transport or national road access.

Recommendation: No modification to the Variation is required.

3.5 Maritime Area Regulatory Authority (Submission 4)

Summary: MARA notes the Draft Variation and welcomes the opportunity to submit its views on it. First, it indicates that on 31 December 2025 (the date of commencement of Part 3 of the Planning and Development Act 2024), MARA became a prescribed body in accordance with the 2024 Act for the purposes of development plans and their variations.

The submission summarises the Authority’s functions under the Maritime Area Planning Act 2021 (MAP Act), which cover:

- assessment and granting of Maritime Area Consents (MACs);
- licensing of Maritime Usage Licences (MULs);
- compliance, enforcement, administration of foreshore consents;
- promotion of cooperation across maritime regulators.

Stating that neither of the rezoned parcels lies within the maritime area or involves land below the high-water mark, MARA is satisfied that the Draft Variation No. 1 will not directly interact with or impact on the maritime area.

Chief Executive’s opinion: The Planning Authority notes MARA’s confirmation that the Draft Variation No. 1 does not directly interact with or impact the maritime area.

Recommendation: No modification to the Variation is required.

3.6 Department of Education and Youth (Submission 9)

The submission made by Department of Education and Youth expresses concerns regarding the potential increase in population, as a consequence of additional housing over the long term, and discusses the implications for future educational infrastructure demand. The Department has no comments on the rezoning of the two RZLT sites.

3.6.1 Population growth and school place demand

Summary of issue: The Department of Education and Youth states that it has considered the Draft Variation and accompanying documents but incorrectly notes that ***“this variation refers to the population growth identified for County Sligo in the current Sligo County Development Plan 2024-2030”***.

There appears to be more confusion in the following paragraph: ***“In terms of future population growth in County Sligo as identified in this variation, the department notes that Section 3.1.3 Consistency with national housing growth requirements has a new annual housing growth requirement from 2026 to 2034 of 672 units per annum”***.

The Department calculates that:

- Delivery of 4,032 units (baseline) may result in an additional ~10,210 people in Sligo.
- Delivery of 6,048 units (with 50% uplift) may result in ~15,362 people.
- Growth from 2031 to 2034 could add a further 6,828–10,241 persons.

At the same time, the Department correctly notes that the Draft Variation ***“contains no amended population projections for any of the individual settlements identified in Core Strategy Table 3.2”*** and observes that ***“it is not possible at this stage for the department to determine future school place needs for these settlements”***.

The submission indicates that school place requirements will be assessed by the Department when settlement-specific population growth projections or housing targets are identified and published.

Chief Executive’s opinion: The Draft Variation seeks to ensure that the availability of serviced land will not become an issue that might hinder residential development and the achievement of the 2025 Housing Growth Requirement of 672 units per year (during the lifetime of the Development Plan, by 2030), which is almost the same as the current Adjusted Total Plan Demand of 671 units per year in the adopted Plan.

The Variation **does not modify the population targets** at County or settlement level. It also **does not alter the settlement-specific housing targets**.

The proposed amendment to Section 3.1.3 (Consistency with national housing growth requirements) **does not set housing growth requirements to 2034**, beyond the lifetime of the Plan. The proposed text simply describes the housing growth requirements set out in the 2025 HGR Guidelines and confirms the availability of sufficient zoned land to meet the requirements.

Any new settlement-specific population growth estimates and housing targets will be determined on the basis of relevant S.28 Ministerial Guidelines and future National Planning Statements operational during the next review of the County Development Plan, due to commence in 2028.

Recommendation: No modification to the Variation is required.

3.6.2 Provision for additional educational infrastructure

Summary of issue: The Department considers that “*The **proposed nine-year (2026-2034) housing growth requirement** could present a significant challenge in terms of future education needs and it could result in major additional school place provision requirements across County Sligo*”.

Chief Executive’s opinion: The Draft Variation **does not propose nine-year housing targets** for the period 2026 to 2034. Its scope is limited to implementing the *Housing Growth Requirements Guidelines* (2025) at County level and updating the Strategic Land Reserve (SLR) policy wording.

No alterations are proposed to settlement-specific housing allocations and population estimates. The Department’s previous recommendations have already been incorporated in the Development Plan by means of several amendments to the Draft Plan.

The next Development Plan, which will have a ten-year life, will be prepared in consultation with the Department of Education and Youth and all relevant infrastructure providers.

Recommendation: No modification to the Variation is required.

3.7 Uisce Éireann (Submission 31)

Uisce Éireann (UÉ) welcomes the opportunity to comment on Draft Variation No. 1 and responds to Parts I and III of the Draft Variation as well as on the Appendix. No comments are made on Parts II and IV.

3.7.1 Part I – Update to the County housing target (CDP Section 3.1.3)

Summary of issue: UÉ notes the new housing growth requirement of 672 units per annum, giving 4,032 units (2024–2030), as well as the additional provision (50%) potentially resulting in 6,048 units over the Development Plan’s life of six.

Also noting that the Draft Variation does not update population estimates in the Core Strategy, UÉ indicates that it relies on CDP population estimates to assess future demand in water resource zones and wastewater treatment plants.

The submission states that if significant additional development occurs in areas with existing constraints, capacity assessments would need to be revisited.

Regarding **water supply**, UÉ indicates that spare capacity in the Sligo Town and Environs Water Resource Zone will come under pressure if the full additional 50% housing provision occurs. The North Sligo Regional Water Resource Zone (Grange, Cliffony, Carney, Mullaghmore) may also require service improvements.

In relation to **wastewater** treatment, it stated that available capacity in Strandhill, Ballysadare, Enniscrone and Cliffony will diminish. For Mullaghmore, where there is no spare capacity, it is envisaged that improvements may occur towards the end of the Development Plan’s life.

Chief Executive’s opinion: UÉ’s caution regarding potential increases in water and wastewater treatment demand is noted. The identification of capacity constraints in certain settlements is acknowledged. However, it is considered that further constraints would not be directly attributable to

the Draft Variation No. 1, which does not introduce any new zoning. In addition, all future development proposals – whether residential, tourism-related or mixed-use – will be assessed through the normal development management process which will involve consultation with UÉ.

Any significant housing growth associated with population increase beyond current assumptions would require future coordination between the Planning Authority and Uisce Éireann.

Recommendation: No modification to the Variation is required.

3.7.2 Part III – amendments to Strategic Land Reserve policies

Summary of issue: UÉ restates its support for the principle of sequential development and its commitment to ongoing engagement with the Planning Authority as new infrastructure is completed or network capacity increases following relevant works.

However, the submission stresses that capacity assessments are conducted individually for each site and do not consider cumulative loads across multiple sites. The advice for developers is to engage with the UÉ Developer Services via the *New Connections* process.

Chief Executive's opinion: The proposed modifications to the SLR policy framework will not change the manner in which water supply and wastewater treatment capacity are assessed. Any proposal for residential development on lands included in the SLR land would need to be accompanied by confirmation of servicing feasibility from UÉ. This is a matter for development management, outside the scope of the Draft Variation.

Recommendation: No modification to the Variation is required.

3.7.3 Infrastructure Assessment of certain sites

Summary of issue: UÉ reiterates that some SLR sites with large development potential will require network reinforcements. Specific sites in Sligo Town are IA Sites No. 26 and No. 28, site PAZ-15A/B and PAZ-9. In Strandhill, the same constraints apply to IA Site No. 9.

It is also indicated that:

- water main upgrades may be needed where existing mains are ≤ 80 mm (developer-funded if no UÉ project exists);
- sewers/pumping stations may need upgrading where sewers ≤ 150 mm or densities increase (developer-funded);
- UÉ assets within zoned sites must be protected or diverted (developer-funded diversion agreements where needed);
- minimum separation distances apply, especially near trunk water mains and sewer mains.

Chief Executive's opinion: UÉ's technical guidance is noted. However, these are essentially operational matters for developers, to be agreed with UÉ at pre-application stage.

Recommendation: No modification to the Variation is required.

3.8 Office of Public Works (Submission 33)

Summary: The OPW, as the lead agency for flood risk management in Ireland, confirms that it has reviewed the Draft Variation documentation and notes the CDP's continued consistency with the Planning System and Flood Risk Management Guidelines (2009), and with the Circular PL02/2014.

The submission reiterates important principles for any future changes to zoning, stating that if these occur in areas subject to flood risk, a Flood Risk Assessment (FRA) must be carried out to an appropriate level of detail and decisions must adhere to the Justification Test requirements of the 2009 Guidelines.

Chief Executive's opinion: The submission does not raise any issues with the proposed Variation. The OPW's reminder regarding FRA requirements for future rezoning proposals is noted.

Recommendation: No modification to the Variation is required.

3.9 Electricity Supply Board (Submission 63)

Summary: The ESB submission focuses on the critical need for electricity infrastructure capacity to support national housing targets – "300,000 homes by 2030 – noting that *"each new home constructed today requires roughly double the electrical capacity as those built before 2019"*.

The submission contains no comments on the Draft Variation but provides extensive context on ESB's strategic role and current operations in County Sligo.

It is indicated that *"the Sligo 110 kV installation serves as a key bulk supply point for Sligo town and the surrounding areas"* and that *"the operational lands at this location are indispensable in accommodating future infrastructure requirements"*.

The submission warns that the existing grid has insufficient capacity to accommodate additional demand, thus potentially impeding the achievement of the housing targets. To address this, the ESB is carrying out or evaluating network reinforcement initiatives throughout County Sligo.

To support the delivery of these critical upgrades, the ESB emphasises the need for close coordination with Sligo County Council to identify suitable sites for the network upgrades. It is also requested that public utilities be permissible under all zoning objectives.

Chief Executive's opinion: The submission raises important issues for long-term planning and delivery of strategic energy infrastructure to support residential and commercial development in the County. These matters are well noted and will inform future plan-making. However, none of the issues raised relates to the Draft Variation No. 1.

The request to amend the Zoning Matrix to make public utilities permissible under all zoning categories is outside the scope of the Variation but will be considered at the next Development Plan review.

Recommendation: No modification to the Variation is required.

4. Submission requesting changes to the wording of policy P-SLR-2

A single submission relates directly to the proposed amendments to Strategic Land Reserve policy P-SLR-2 and is considered within scope of the Draft Variation. Having regard to that submission, the Chief Executive recommends a minor clarification to Part III of the Draft Variation.

Submission 62

Summary: Beldare Homes welcomes the intent of Draft Variation No. 1 to align the Sligo County Development Plan with the Housing Growth Requirements Guidelines (2025).

The core of the submission relates to the amendments proposed to the policy P-SLR-2. The submitter raises concerns that the phrase “*are/have become fully serviced*” is unnecessarily restrictive, potentially confusing and not reflective of common practice whereby sites become fully serviced through the planning application process (e.g. new connections to foul, water, or transport infrastructure).

The submission argues that excluding SLR lands that are serviceable, but not yet fully serviced, may unfairly preclude development on otherwise suitable and centrally located lands, even where comparable or inferior lands elsewhere have been zoned residential.

The submitter requests a modification so that SLR lands may qualify where they have “*reasonable potential to become fully serviced through the planning application process*.” The exact wording proposed is as follows (proposed addition shown in **bold type**, proposed deletion in ~~strike-through type~~):

P-SLR-2

Exceptions to the above policy will only be considered in the following circumstances:

- A. *The lands have been identified for the provision of social and affordable housing as part of the Local Authority Housing Delivery Action Plan OR*
- B. *There is factual evidence that such lands are / ~~have become~~ fully serviced or **have the reasonable potential to become fully serviced** through the planning application process, in terms of water supply, wastewater and transport infrastructure.*

Any proposal for residential or mixed-use development (including residential) on such lands must have regard to the Compact Growth policies set out in Section 10.4, Chapter 10 (this chapter) of the Development Plan. The proposal must also demonstrate capability to deliver residential development within the lifetime of the Plan, thus facilitating progress towards the housing targets for the respective settlement.

No rezoning is requested, and the submission is not settlement specific.

Chief Executive’s opinion: The submission relates to one of the elements of the Draft Variation – the proposed amendments to policy P-SLR-2 – and therefore is considered within scope.

The submission points out that the wording “*are / have become fully serviced*” may give rise to uncertainty about whether SLR sites that are not yet fully serviced, but clearly serviceable, may be considered for residential development.

The Planning Authority accepts that some sites may become fully serviced through the planning application process and clarifying this in P-SLR-2 would support consistent interpretation.

A targeted clarification would not expand the purpose or scope of the Variation. Such clarification would be a minor modification, not a material alteration.

Additional wording should be included to clarify that SLR lands may be considered for residential or mixed-use development where they have the reasonable potential to become fully serviced, and this potential can be demonstrated at pre-application stage.

Recommendation:

In **Part III of the Draft Variation** (Amendments to Strategic Land Reserve policies), make minor modifications to the proposed text in the policy box, as follows:

text to be deleted is shown ~~in double-strikethrough type~~

text to be inserted is shown **in bold, green, larger type**

Strategic Land Reserve policies

It is the policy of Sligo County Council to:

P-SLR-1 Restrict development on lands included in the Strategic Land Reserve, which are shown on the Zoning Maps pertaining to the towns and villages plans contained in this CDP.

P-SLR-2 Exceptions to the above policy will only be considered in the following circumstances:

- A.** The lands have been identified for the provision of social and affordable housing as part of the Local Authority Housing Delivery Action Plan **OR**
- B.** There is factual evidence that such lands are ~~have become~~ fully serviced in terms of water supply, wastewater and transport infrastructure, **or have the reasonable potential to become fully serviced through the planning application process, and this potential can be clearly demonstrated at pre-application stage.**

Any proposal for residential or mixed-use development (including residential) on such lands must have regard to the **Compact Growth policies** set out in **Section 10.4, Chapter 10** (this chapter) of the Development Plan.

The proposal must also demonstrate capability to deliver residential development within the lifetime of the Plan, thus facilitating progress towards the housing targets for the respective settlement.

5. Issues raised in submissions referring to Strandhill

A total of forty-eight (48) submissions relate specifically to Strandhill. While individual submissions vary in scope, detail and focus, the overall picture that emerges is consistent: the vast majority of contributors object to the scale, location and implications of the perceived “rezoning” of lands for residential development, particularly around the National School and along the Golf Course Road.

Almost all submissions refer to multiple concerns, which are summarised under thematic headings in the subsections below.

A large number of submissions appear to be based on shared wording templates, many of which repeat identical structures and language. Regardless of origin, all submissions have been considered on their merits.

Summary table of issues raised in submissions referring to Strandhill

Issue	Submissions raising the issue
5.1 Strandhill National School: “loss” of space for future expansion (IA Sites No. 10 and No. 11)	37 submissions: 5, 6, 7, 16, 19, 21, 22, 23, 24, 25, 26, 28, 30, 32, 34, 36, 37, 38, 39, 40, 42, 44, 45, 46, 48, 49, 50, 51, 55, 56, 58, 59, 60, 64, 65, 66, 68
5.2 Traffic, road safety, public safety (Golf Course Road, Buenos Aires Drive, Shore Road, junction near the church)	34 submissions: 5, 6, 7, 19, 21, 23, 24, 25, 26, 28, 30, 32, 34, 36, 37, 38, 39, 40, 42, 44, 46, 47, 48, 49, 50, 51, 58, 59, 60, 65, 66, 68, 70, 74
5.3 Wastewater treatment plant capacity	32 submissions: 2, 6, 11, 12, 16, 19, 21, 22, 23, 25, 26, 27, 28, 29, 30, 34, 38, 39, 40, 44, 48, 49, 50, 51, 54, 55, 58, 59, 60, 65, 66, 68
5.4 Scale of additional housing land / “overzoning” / high-density housing / excess uplift relative to HGR Guidelines headroom, lack of consistency with NPF, RSES, Core Strategy, Settlement Strategy	28 submissions: 6, 21, 22, 24, 25, 26, 27, 28, 29, 30, 32, 34, 37, 38, 39, 40, 42, 44, 47, 48, 50, 51, 54, 58, 64, 65, 68, 73
5.5 Deficit of community facilities and recreational open space	29 submissions: 5, 6, 7, 19, 21, 23, 22, 24, 25, 28, 30, 34, 36, 37, 39, 40, 44, 47, 49, 50, 51, 55, 56, 58, 59, 64, 65, 68, 73
5.6 Environmental concerns / biodiversity / coastal landscape and erosion / climate change / Natura 2000 / Habitats Directive compliance	25 submissions: 2, 6, 11, 12, 16, 19, 21, 22, 23, 25, 28, 29, 30, 39, 40, 44, 47, 48, 49, 50, 51, 54, 58, 65, 68
5.7 Impact on village character and tourism	16 submissions: 19, 21, 22, 23, 25, 30, 39, 44, 50, 51, 54, 58, 64, 65, 68, 70

Issue	Submissions raising the issue
5.8 Need for a long-term masterplan	18 submissions: 21, 25, 26, 28, 30, 34, 39, 40, 42, 44, 48, 50, 51, 58, 60, 66, 68
5.9 Inconsistencies with prior OPR advice and Draft Ministerial Direction	10 submissions: 2, 7, 11, 24, 27, 29, 40, 45, 66, 73
5.10 Legal and procedural deficits	8 submissions: 2, 11, 12, 27, 29, 40, 54, 73
5.11 Foreshore / MARA / EPA licensing	5 submissions: 2, 11, 12, 27, 29
5.12 UNESCO / archaeological landscape concerns	3 submissions: 16, 40, 54
5.13 Requests to revert the zoning of PAZ-56 from nRES to Green Belt	3 submissions: 46, 66, 69
5.14 Golf Club safety buffer	1 submission: 70
5.15 UNCRC / rights of the child	1 submission: 73
5.16 Accuracy of the Infrastructure Assessment (Appendix)	1 submission: 70

5.1 Strandhill National School: “loss” of space for future expansion (IA Sites No. 10 and No. 11)

Summary of issue: Many submissions argue that “rezoning” and/or releasing the central SLR lands (i.e. IA Site No. 11) would “box in” Scoil Asicus Naofa, removing the only realistic expansion possibility, and that the lands immediately adjoining the school (IA Sites No. 10 and/or No. 11) should be reserved for education/community use (or a buffer) rather than high-density housing.

Submissions state that the school is currently operating at capacity. Junior classes are reported as sharing yard space on a rotation basis due to spatial limitations. Some submissions refer to Department of Education policy that recommends protecting expansion buffers and providing for future Special Education Needs accommodation (SEN) as populations grow. Others emphasise that the lands in question represent the last centrally located opportunity for educational and community facilities and should therefore be reserved for such use. The proximity of housing to the school also raises concerns regarding loss of privacy, overshadowing, and increased security risk, particularly where two-storey units are proposed close to school buildings.

Chief Executive’s opinion: The concerns are noted. However, Draft Variation No. 1 does not propose any rezoning in Strandhill.

Upon adoption of the Sligo CDP 2024-2030, the lands known as IA Sites No. 10 and No. 11 were zoned by the Elected Members for new residential uses, with IA Site No. 11 included in the SLR. As a consequence of the Draft Ministerial Direction, the southern portion of IA Site No. 10 is also currently included in the SLR.

The zoning of the two sites adjoining the school cannot be changed from SLR (RES) to CF (community facilities) as part of the Draft Variation currently under consideration.

The Draft Variation No. 1 is limited to text changes intended to reflect the introduction of new housing growth requirements and to SLR policy adjustments in response to the Housing Growth Requirements Guidelines.

It is considered that land requirements for educational facilities are best addressed through the development plan review process based on the Department's identification and acquisition of sites for the expansion of existing schools or the provision of new schools.

Recommendation: No modification to the Variation is required.

5.2 Traffic, road safety, public safety risks along the Golf Course Road and at its junction with the Buenos Aires Drive/ Shore Road near the church

Summary of issue: Submissions cite existing congestion and safety risks for children walking or cycling to school, inadequate footpaths/lighting/turning, and substandard junction geometry. The Golf Club details specific road width/DMURS/sightline deficiencies and operational risks to the course from intensified use of the road.

Nearly all submissions referencing traffic describe the junction at St. Patrick's Church (Golf Course Road) as already dangerously congested. Many parents report that the National School advises families to drop children at the church car park due to the unsafe nature of the road leading directly to the school. At the same time, the Board of Management of the National School is concerned that the local church is "*looking at charging for use of their car park*" due to increased use by the community and parents for school drop-offs and pick-ups.

Submitters emphasise that the road is narrow, winding, has limited footpaths, and that substantial active travel or *safe routes to school* interventions would be required before any additional residential development could be accommodated. Concerns are raised that construction traffic associated with new housing – including heavy goods vehicles – would increase the danger, particularly during school hours. Several submissions state that the junction must be redesigned and assessed before "rezoning" proceeds.

Chief Executive's opinion: The above issues are matters normally addressed through development management at planning application stage (DMURS compliance, Road Safety Audits) and through the implementation road improvement schemes (including active travel and *safe routes to school*).

The Draft Variation No. 1 does not rezone lands or amend any transport objectives in Strandhill.

Recommendation: No modification to the Variation is required.

5.3 Wastewater treatment plant capacity

Summary of issue: A substantial number of submissions highlight concerns with the existing Strandhill Wastewater treatment plant (WWTP), citing EPA findings, recorded ammonia exceedances, and documented sewage overflows onto public roads and car parks. Many submissions mention the seasonal overloading linked to tourism and claim that releasing additional residential land is premature. Some request moratoria or retrospective AA/EIA.

Several submissions note that the WWTP may be “in biological collapse”. Residents also express concern about potential impacts on groundwater during construction (of future housing), about coastal waters used for bathing, and about seasonal overloading caused by tourism.

Multiple submissions state that it would be contrary to national policy to zone additional lands or permit further connections until WWTP upgrade works are confirmed and funded.

Chief Executive’s opinion: WWTP investment and compliance are matters for Uisce Éireann, which has its own Capital Investment Plan and Strategic Funding Plan. The Draft Variation No. 1 does not rezone lands in Strandhill and does not alter the wastewater policies included in the CDP. Any development proposal would be required to make a pre-connection enquiry to Uisce Éireann and would remain subject to AA/EIA, as applicable.

Recommendation: No modification to the Variation is required.

5.4 Scale of additional housing land / “overzoning” / high-density housing / excess uplift relative to HGR Guidelines headroom, lack of consistency with NPF, RSES, Core Strategy, Settlement Strategy

Summary of issue: Submissions contend that the Strandhill uplift implied by SLR land release (up to 11.75 ha or 235 housing units) equates to c. 167% above the yield of lands already zoned residential in the Village Plan. This would exceed the “up to 50%” additional provision specified in the HGR Guidelines.

Several submissions call this inconsistent with the Core Strategy and Settlement Strategy, which specify that satellite villages should accommodate growth only where adequate services and infrastructure exist to support it. Other submissions state that Strandhill is being “overzoned” relative to its population (1,982 in 2022) and stress the need for proportionate, evidence-based allocation.

Further submissions contend that the perceived “overzoning” in a designated Satellite Village conflicts with the National Planning Framework and the Regional Spatial and Economic Strategy.

Chief Executive’s opinion: The Draft Variation No. 1 updates the county-level housing target, together with the corresponding text, and adjusts the SLR policies in response to HGR Guidelines, to ensure that sufficient headroom is available in terms of residential zoned land in County Sligo.

The Draft Variation does not alter the settlement-level housing allocations or population targets, nor does it rezone lands in Strandhill. The Settlement Strategy component of the Core Strategy remains as adopted in the CDP. There is no conflict with the NPF or RSES, neither of which address zoning in villages.

Recommendation: No modification to the Variation is required.

5.5 Deficit of community facilities and recreational open space

Summary of issue: A large number of submissions describe Strandhill as having a chronic lack of public playing fields, indoor sports facilities, community centre or meeting space, public green and recreational space.

SLR lands around the school are frequently cited as the only remaining opportunity to provide such facilities. Multiple submissions seek to safeguard these lands for community facilities – open space, school expansion, community centre, playing fields – rather than high-density housing.

Several submissions request that Council-owned lands adjacent to the National School be rezoned for Community Facilities or Open Space, to facilitate school expansion, safe active travel and the delivery of a community centre.

Chief Executive’s opinion: The concerns raised are acknowledged. The wider issues of school capacity, active travel, safe footpath connections, and community service provision are recognised as legitimate and important considerations for the sustainable development of Strandhill. However, the Draft Variation No. 1 is narrowly scoped. Its purpose is limited to implementing the Housing Growth Requirements Guidelines (2025) at county level and updating the Strategic Land Reserve (SLR) policy wording.

The Draft Variation does not introduce changes to zoning or amendments to settlement-specific objectives in the Strandhill Village Plan (Chapter 19 in Volume 2 of the CDP).

The delivery of new community infrastructure can be achieved on lands already zoned for such purposes (there is a substantial site adjoining the Airport Road).

Any rezoning proposals can be addressed as part of the next review of the County Development Plan, due to commence in 2028.

Recommendation: No modification to the Variation is required.

5.6 Environmental concerns / biodiversity / coastal landscape and erosion / climate change / Natura 2000 / Habitats Directive compliance

Summary of issue: Submissions cite risks to dune habitats, SAC, SPA, need for robust AA/SEA and potential cumulative impacts (visitor pressure, trails, coastal works). Others express concerns that increased development will heighten pressure on Strandhill’s sand dune systems, which already experience erosion and heavy recreational usage. Some reference ALAN (artificial lighting at night), light pollution, shellfish waters.

Many submissions reference Strandhill’s position within a sensitive coastal environment, wildlife corridors, and proximity to the Killaspugbrone Loop.

One detailed submission asserts that badger setts are present on lands known as IA Sites no. 10 and 11, and they use the sites as passage routes between the mountain and the village. The disturbance or destruction of these setts would violate the Wildlife Act 1976 & Wildlife (Amendment) Act 2000 and development on these lands would therefore constitute “harm” or “disturbance” to a protected species.

Some submissions contend that the Variation is inconsistent with obligations under the EU Habitats Directive, both in terms of required Appropriate Assessment and the precautionary principle.

Multiple submissions highlight Strandhill’s importance as a landscape of archaeological and scenic significance, linked to Knocknarea, and warn that intensive development risks eroding the area’s distinctive character.

Chief Executive's opinion: The issues above would be relevant only if raised in the context of a Development Plan review, accompanied by a full Strategic Environmental Assessment and a Natura Impact Assessment, or in connection with a specific planning application. However, they are not relevant to the Draft Variation no. 1 of the Sligo CDP 2024-2030.

The Draft Variation has been subject to screening for Strategic Environmental Assessment and Appropriate Assessment. The screening reports and screening determinations, which were published together with the other consultation documents, indicate that neither a full SEA nor a Stage 2 AA (Natura Impact Report) is required for the Draft Variation No. 1 of the current Sligo County Development Plan 2024-2030.

Extract from the SEA Screening Determination:

The Draft Variation No. 1 does not require SEA for the following reasons:

- The content of the CDP has been informed by SEA, AA and SFRA undertaken in tandem with each stage of the Plan preparation, thereby ensuring full integration of environmental considerations in the promotion of sustainable development. The Draft Variation No. 1, while not relevant for the integration of environmental considerations in the Development Plan, is consistent with the sustainable development strategies, policies and objectives of the Plan.*
- The extent to which the Draft Variation No. 1 modifies the framework for projects or other activities- whether in terms of location, nature, size, operating conditions, or resource allocation – is considered minor.*
- While the CDP has the capacity to influence lower-level plans and development projects, the degree to which the Draft Variation No. 1 would contribute to such influence is considered minor and unlikely to result in significant environmental effects.*
- No additional land is proposed to be zoned for development, and no other Plan policies or objectives are proposed to be altered.*
- The Draft Variation No. 1 does not alter in any way the conclusions of the SEA for the Sligo County Development Plan 2024-2030 and is not likely to result in significant cumulative effects on the environment.*

Extract from the AA Screening Determination:

As identified in the AA Screening Report:

- The elements of the Draft Variation have been considered in the wider context of the CDP, with respect to the known threats and pressures related to European sites. There are no additional sources of effects introduced by the Draft Variation that were not already considered by the AA processes already undertaken for the current Plan.*
- The risks to the safeguarding and integrity of the qualifying interests, special conservation interests and conservation objectives of the European sites have been addressed through existing, already in force, mitigating policies and objectives contained within the Sligo CDP (which was subject to Stage 2 AA), with which all lower-tier plans/projects must comply. In addition, any future projects, plans etc. that may arise will themselves be subject to AA, or screening for AA, when further details of design and location are known.*
- The Habitats Directive requires the assessment to consider other plans or programmes that might, in combination with the Draft Variation, have the potential to adversely impact upon European sites. There are no provisions in the Draft Variation that would introduce any sources of effects. Therefore, there are no in-combination effects identified.*
- It is concluded that Draft Variation No. 1 of the current CDP will not give rise to any effects on the ecological integrity of any European Site, alone or in combination with any other plans, programmes, projects etc.*

Any potential project-level effects must be addressed at pre-application stage, through screening or full AA/EIA, as appropriate.

Recommendation: No modification to the Variation is required.

5.7 Impact on village character and tourism

Summary of issue: Submissions describe Strandhill as a coastal tourism village whose character and attractiveness are central to its economy. Many argue that large-scale housing and excessive densification in the village core would create a “concrete jungle”, undermine visual amenity and damage the visitor experience. Some note that large investments (e.g. the National Surf Centre, walking trails, public realm improvements) were designed to enhance Strandhill’s tourism role, and that “uncontrolled” residential development conflicts with these objectives.

Chief Executive’s opinion: The concerns expressed are recognised as relevant considerations in the ongoing management of Strandhill’s development. However, the Draft Variation No. 1 does not propose any changes in density or in the pattern of development permissible within the village.

Any future development proposals – whether residential, tourism-related or mixed-use – will be assessed through the normal development management process, having regard to the design, scale and visual impact of any proposal in the context of Strandhill’s role as a *Settlement with Special Coastal Tourism Functions*.

Recommendation: No modification to the Variation is required.

5.8 Need for a long-term masterplan

Summary of issue: A substantial proportion of submissions argue that Strandhill lacks a coherent long-term (10 to 15 years) masterplan and that the Variation constitutes “piecemeal zoning” in advance of necessary long-term planning. Submitters state that such a masterplan must integrate:

- educational capacity
- wastewater and water services
- active travel and mobility
- community infrastructure
- sustainable tourism
- environmental constraints
- coastal protection

Some submissions note previous requests for strategic planning engagement that have not been acted upon. Others express concern that zoning decisions are occurring ahead of, rather than informed by, infrastructural assessment or community consultation.

Chief Executive’s opinion: The request for a masterplan is acknowledged. It is noted that several of the above-mentioned elements are **already embedded within the adopted Strandhill Village Plan** (Chapter 19 in Volume 2 of the CDP) including:

- **Integrated coastal planning objectives** (Section 19.3.2), requiring preparation of an *integrated coastal management plan*;
- **Landscape, natural heritage and open-space objectives** (Section 19.3.1), setting an environmental and green-infrastructure framework;
- **Transport, circulation and active travel objectives** (Section 19.3.5), providing a range of road/junction/parking/walking/cycling improvement measures for the village;

- **Streetscape, public realm and mixed-use design objectives** for the Promenade, Shore Road and Buenos Aires Drive / village core (19.3.4 and 19.3.3);
- **Community facilities objective** (19.3.6) identifying the need for multi-functional community-serving uses on the greenfield site zoned CF at Airport Road.

These objectives of the existing Strandhill Village Plan, together with the associated Zoning Map and Objectives Map, provide a framework for development up to 2030. The County Development Plan 2024-2030, which includes the Strandhill Village Plan, was adopted by the Elected Members after three rounds of public consultation in which Strandhill residents participated in substantial numbers. The adopted CDP accurately reflects the decisions of their elected representatives.

In accordance with the Planning and Development Act 2024, the next CDP/Strandhill Village Plan will have a longer, ten-year life. All Strandhill residents and other stakeholders will have the opportunity to propose and contribute to a more detailed village plan by taking part in all stages of consultation during the next Development Plan review, due to commence in 2028.

Recommendation: No modification to the Variation is required.

5.9 Inconsistencies with prior OPR advice and Draft Ministerial Direction

Summary of issue: A number of submissions argue that any proposal to activate or release lands – particularly the site known as PAZ-57 (east of Golf Course Road) – would conflict with prior OPR advice and with elements of the Minister’s Draft Direction issued after the adoption of the Sligo County Development Plan 2024–2030. Submissions maintain that these lands were previously identified by the OPR and by the Minister as unsuitable for residential zoning

The submitters argue that any movement toward SLR activation in Strandhill would contradict earlier OPR recommendations, and that the Draft Variation should explicitly avoid enabling such outcomes.

Chief Executive’s opinion: The Draft Variation No. 1 does not identify specific sites or propose the release of specific SLR lands in Strandhill. The application of the amended SLR policy in the assessment of development proposals on eligible sites would remain a matter for development management.

Any future proposal involving SLR sites will be required to demonstrate consistency not only with the SLR policies, but also with the Compact Growth policies and development management standards included in the CDP.

The SLR policy update in this Variation does not conflict with prior OPR advice or the Minister’s Draft Direction in relation to sites in Strandhill. On the contrary, the OPR indicates in its submission (Submission 20) that

“...the Strategic Land Reserve zoned lands were relatively recently assessed by the Office as part of the County Development Plan, particularly with regard to compact growth and sequential development. The Office is satisfied that this assessment remains relevant in the context of current national and regional policy.

*Accordingly, having regard to the above considerations, **the Office is satisfied with the proposed Variation.**”*

Recommendation: No modification to the Variation is required.

5.10 Legal and procedural deficits

Summary of issue: Several submissions argue that the Draft Variation No. 1 unlawfully facilitates the release of unserviced, environmentally sensitive lands in Strandhill, in defiance of the Ministerial Draft Direction, OPR recommendations and EU environmental law.

It is asserted that the Strandhill WWTP is “failing” and cannot support further development; that SEA/AA screenings rely on obsolete environmental baselines; that the Variation constitutes overzoning far beyond HGR allowances; that the community suffers a long-standing deficit in school capacity, safe access routes and community facilities; and that cumulative impacts from tourism, lighting, and infrastructure have not been assessed.

Other submissions contend that *“the failure to assess the ‘in-combination’ effects of recent tourism infrastructure (National Surf Centre, public realm works, and trail networks) alongside the failing WWTP violates the EIA Directive”* and that *“by separating tourism developments from residential zoning assessments, the Council has engaged in ‘project splitting’”*.

One submission seeks rezoning of lands for community use, an “embargo” on planning permissions and full environmental reassessment through updated AA/EIA. It is requested that *“the Planning Authority withdraw the proposed amendments to P-SLR-2 and P-SLR-4”*, indicating that *“failure to do so will result in a referral to the Office of the Planning Regulator (OPR) and, if necessary, the European Commission regarding the systemic failure to protect Natura 2000 sites in Sligo”*.

Chief Executive’s opinion: The submissions alleging legal, procedural, and environmental non-compliance are noted. However, such assertions do not reflect the actual scope, content, or legal effect of Draft Variation No. 1, which does not change any zoning, SLR designations, or settlement-specific objectives. Accordingly, the Variation does not give rise to the legal or environmental consequences described in the submissions.

Claims relating to wastewater compliance, community-facility deficits, road capacity, or cumulative impacts from tourism infrastructure remain outside the scope of the Draft Variation. Such matters are appropriately addressed through the ongoing implementation of Development Plan policies, the Council’s capital investment programmes, and project-level planning assessments, including AA/EIA as required under EU and national legislation.

Allegations of “project splitting” or systemic environmental non-compliance are not substantiated within the context of this Variation, which does not authorise any project, development, or works. All future planning applications remain subject to environmental assessment requirements under the Planning and Development Act and the Habitats and EIA Directives.

The Draft Ministerial Direction and the OPR’s statutory oversight continue to apply. The Variation does not seek to circumvent these mechanisms or to alter the zoning objective applicable to any site subject to the Draft Direction. Submissions seeking the “withdrawal” of the Variation are not supported by the opinion of statutory bodies, especially that of the OPR. As already indicated above, the OPR is satisfied with the proposed variation, while the Minister has not issued any comments on it.

Finally, calls for an “embargo” on planning permissions have no place in a statutory plan variation process.

Recommendation: No modification to the Variation is required.

5.11 Foreshore / MARA / EPA licensing

Summary of issue: It is stated that “the EPA has formally initiated a review of the WWTP License as of September 2024” and that “the WWTP discharge pipe at Killaspugbrone was upgraded without a mandatory Foreshore License or Maritime Area Consent (MAC)”.

Submitters assert that “By failing to disclose this unlicensed infrastructure to MARA, SCC has bypassed the very authority responsible for maritime enforcement”, that the wastewater outfall works at Killaspugbrone required updated foreshore licensing/MAC and that the Variation fails to acknowledge the alleged non-compliance.

Chief Executive’s opinion: The matters relating to foreshore licensing by the Maritime Area Regulatory Authority (MARA) and to EPA regulatory processes are outside the scope of Draft Variation No. 1. The state body in charge of such matters is Uisce Éireann, which builds, operates and maintains wastewater infrastructure throughout the state.

Recommendation: No modification to the Variation is required.

5.12 UNESCO / archaeological landscape / intervisibility

Summary of issue: Concerns relate to visual impacts, intervisibility with Knocknarea and broader archaeological landscape integrity, particularly in the context of a potential UNESCO nomination.

Chief Executive’s opinion: The protection of landscape, archaeological monuments and visually sensitive areas is addressed through the Development Plan’s landscape character policies and built heritage policies, appropriately applied in the assessment of planning applications.

Furthermore, the Development Plan includes a World Heritage Site objective (O-WHS-1 in Section 25.2, Chapter 25, Volume 3 of the CDP), which reinforces Sligo County Council’s leading role in the process of nominating ‘The Passage Tomb Landscape of County Sligo’ for inclusion on Ireland’s Tentative List of UNESCO World Heritage Sites. Any concerns in this regard can be addressed through development management at planning application stage.

Recommendation: No modification to the Variation is required.

5.13 Requests to revert the zoning of PAZ-56 from nRES to Green Belt

Summary of issue: It is requested that the site known as PAZ-56 be “removed” from the CDP by rezoning it as Green Belt instead of New Residential. It is stated that the (adopted) residential zoning of the site was not supported by the SEA, OPR or the Chief Executive of Sligo County Council.

Chief Executive’s opinion: The New Residential (nRES) zoning of the site known as PAZ-56 was decided by the elected Members of Sligo County Council when they made/adopted the Sligo CDP 2024-2030. The prior Chief Executive’s opinions have become inconsequential upon the Plan’s adoption. Furthermore, the OPR did not recommend dezoning of PAZ-56 in its letter to the Minister, and the Draft Ministerial Direction does not affect the site.

Recommendation: No modification to the Variation is required.

5.14 Golf Club safety buffer

Summary of issue: The Golf Club has been advised that the safety distance separation between the turning point of the 10th hole and the site boundary should be increased to 70 metres (which is a worldwide standard) *“to mitigate the enhanced danger to the public that will arise due to increased footfall and traffic, directly and indirectly associated with the proposed development”*.

This is a reference to potential development on the adjoining site known as IA Site No. 10, which – the Golf Club Chairperson contends – has serious infrastructure deficiencies.

It is contended that there is no scope to increase the separation to 70 metres in line with the standard, and the alternative solution would be costly for the Club.

Chief Executive’s opinion: The safety distances represent an operational matter for the Golf Club, which is entitled to make submissions on planning applications for any type of development on adjoining sites.

Recommendation: No modification to the Variation is required.

5.15 UNCRC / rights of the child

Summary of issue: One submission considers that *“the Council’s failure to provide safe footpaths, adequate school space, and a community centre constitutes a breach of the UN Convention on the Rights of the Child (UNCRC)”*

Chief Executive’s opinion: The UNCRC is not directly incorporated into Irish law. It does not create a legally binding obligation on planning authorities in Ireland. Therefore, Sligo County Council cannot be in breach of the UNCRC in the way a public body can be found in breach of Irish or EU law. The rights of children are outside the scope of the Draft Variation No. 1 of Sligo CDP.

Recommendation: No modification to the Variation is required.

5.16 Accuracy of the Infrastructure Assessment (Appendix)

Summary of issue: Submission 70 refers to the IA assessment of Site No. 10, which indicates that site meets the Tier 1 requirements in terms of access to watermain, foul sewer, surface water drainage system, road and footpath. It is submitted that this site does not meet these requirements, as *“there are serious deficiencies in the road network in this area and its capacity to accommodate residential development”*.

Chief Executive’s opinion: The IA assessment refers strictly to the site’s direct access to infrastructure, not to the entire road network’s capacity to accommodate additional development. While it is acknowledged that the Golf Course Road should be upgraded, this does not change the IA assessment of the respective site.

Recommendation: No modification to the Variation is required.

6. Issues raised in submissions referring to Sligo Town

Eight (8) submissions relate to sites located within the Plan limit of Sligo Town. The vast majority argue for rezoning of lands, based on recent infrastructure improvements or on a perceived shortfall of land zoned for residential uses. Two submissions object to the perceived “rezoning” of sites against the previous recommendations of the OPR (i.e. during the CDP review process, 2023-2024).

Several submissions request corrections to the Infrastructure Assessment and Settlement Capacity Audit scores of specific sites. Two submissions request a longer planning horizon, with higher housing targets. Two submissions suggest amendments to Policies P-SLR-1 and P-SLR 2, among other requests.

Summary table of issues raised in submissions referring to Sligo Town

Issue	Submissions raising the issue
6.1 Zoning issues	
6.1.1 Requests to rezone lands from Green Belt and SLR to residential uses (nRES)	4 submissions: 18, 41, 43, 72
6.1.2 Requests to rezone lands from Green Belt to SLR	2 submissions: 18, 41
6.1.3 Requests to zone additional land for residential uses	2 submissions: 35, 43
6.1.4 Requests to prioritise lands for housing development	4 submissions: 18, 35, 41, 43
6.1.5 Claims that certain sites are fully serviced and Tier 1 / Tier 2 classification used to justify rezoning requests	5 submissions: 18, 35, 41, 43, 72
6.1.6 Objection to current zoning or perceived “rezoning”	2 submissions: 13, 53
6.1.7 RZLT submissions seen as rezoning trigger	2 submissions: 18, 41
6.2 Non-zoning issues	
6.2.1 Requests to replace CDP Table 5.2, increase the headroom to 50%, extend the planning horizon to 2038 and update settlement targets to address housing shortfall	2 submissions: 35, 41
6.2.2 Requests to modify the IA classification and / or the SCA scores of certain sites	5 submissions: 13, 18, 41, 43, 67
6.3 Policy-related issues	
6.3.1 Request for amendment to Policy P-SLR-1	1 submission: 41
6.3.2 Request for amendment to Policy P-SLR-2	2 submissions: 41, 43

6.1 Zoning issues

6.1.1 Requests to rezone lands from Green Belt and SLR to residential uses (nRES)

Summary of issue: Several submissions call for the rezoning of lands currently designated as Green Belt or Strategic Land Reserve (effective zoning either as adopted or as a consequence of the Draft Ministerial Direction) to “development” or residential uses (nRES).

These requests focus on specific sites, each described as being serviceable or fully serviced and suitable for residential development.

- **Lands at Shannon Eighter – IA Sites No. 32 and No. 34**

It is argued that these lands were zoned Mixed Uses / SLR until 2024, and that their current inclusion in the Green Belt is inconsistent with both their Tier 2 infrastructural status, after the recent Rosses Point/Ballincar WWTP upgrade and the completion of the footpath between the lands and the town. It is requested that the sites be zoned for “development” or residential uses.

- **Site PAZ-13 at Caltragh / Magheraboy (affected by the Draft Ministerial Direction)**

These lands are fully serviced, located approximately 1.3 km from the town centre, and close to significant employment and social infrastructure. It is requested that the site – which was zoned nRES but reverted to SLR as a consequence of the Draft Ministerial Direction – be rezoned for residential uses (nRES).

- **Lands at Tonaphubble (affected by the Draft Ministerial Direction)**

The request seeks the restoration of nRES and OS zoning (these were the adopted zoning objectives for the lands, currently reverted to Green Belt as a consequence of the Draft Ministerial Direction), supported by the site’s existing water, sewerage, road infrastructure, public lighting, access to public transport and its location adjacent to established residential areas.

Chief Executive’s opinion: The rezoning requests are noted. However, they fall outside the scope of the Draft Variation No. 1, which does not propose any rezoning in Sligo Town.

The Draft Variation No. 1 is limited to text changes intended to reflect the introduction of new housing growth requirements and to SLR policy adjustments in response to the Housing Growth Requirements Guidelines.

The future zoning of sites affected by the Draft Ministerial Direction will be determined by the Minister through issuing a final Direction.

Those sites where the effective zoning is SLR may be eligible for residential development under the amended SLR policies proposed by this Variation.

Recommendation: No modification to the Variation is required.

6.1.2 Requests to rezone lands from Green Belt to SLR

Summary of issue: Two submissions request that lands at Shannon Eighter, currently included in the Green Belt, be at least included in the SLR if not rezoned for “development” or nRES. These lands are IA Sites No. 32 and No. 34.

Chief Executive’s opinion: The rezoning requests fall outside the scope of the Draft Variation No. 1, which does not propose any rezoning in Sligo Town.

Recommendation: No modification to the Variation is required.

6.1.3 Requests to zone additional land for residential uses

Summary of issue: Two submissions request the zoning of additional land for residential uses in general or in certain locations. One submission indicates “*brownfield at Back Avenue, Cleveragh*”, currently zoned Open Space.

Chief Executive’s opinion: The requests for additional residential zoning fall outside the scope of the Draft Variation No. 1, which does not propose any rezoning in Sligo Town.

Recommendation: No modification to the Variation is required.

5.1.4 Requests to prioritise lands for housing development

Summary of issue: Submissions regarding lands at Shannon Eighter request not only rezoning but also prioritising the respective sites for housing delivery.

One submission argues that a large portion of the Strategic Land Reserve appears constrained in the SCA, and therefore many SLR lands may not be suitable for housing in the short term. It is suggested that the Variation should include a classification or filtering step (e.g. sub-tiers) to identify suitable SLR land. It also states that brownfield and infill lands should be prioritised.

Another submission requests the Council to prioritise the zoning of Tier 1 lands “*that are available and ready to be delivered*”, but also the zoning of greenfield lands served by the Western Distributor Road in order to achieve an objective of the RSES, i.e. RPO 3.7.42.

It is also requested that the forthcoming Sligo Town Urban Area Plan (UAP) should prioritise specific lands for future residential development. The submission argues that lands at Back Avenue / Cleveragh should be identified in the UAP as priority development areas because of their serviceability, strategic location, and ability to support compact growth. It also suggests that the UAP must clarify future land requirements and consider “*rezoning of land zoned for other purposes, rather than necessarily expanding the settlement footprint*”.

Chief Executive’s opinion: Requests for prioritisation – through zoning or otherwise – are outside the scope of the Draft Variation No. 1.

With regard to “filtering” or “classification”, the “traffic light” classification in the Infrastructure Assessment and the scoring system used in the Settlement Capacity Audit are useful tools in the identification of SLR lands which are suitable for development.

The (re-)classification and (re-)prioritisation of lands for zoning will be undertaken through updated Infrastructure Assessment and Settlement Capacity Audit as part of the next review of the County Development Plan, due to commence in 2028

Recommendation: No modification to the Variation is required.

6.1.5 Claims that certain sites are fully serviced and Tier 1 / Tier 2 classification used to justify rezoning requests

Summary of issue: Several submissions base their rezoning requests on the classification of their subject lands as Tier 1 or Tier 2, or on claims that the respective sites are fully serviced. The subject sites are located at Shannon Eighter (Sites IA No. 32 and No. 34), at Back Avenue/Cleveragh (brownfield site and its backlands), at Caltragh/Magheraboy (PAZ-13) and at Tonaphubble (PAZ-11).

Chief Executive's opinion: The classification of any site as Tier 1 or tier 2 is not relevant in the context of the Draft Variation No. 1. A full review of the IA or SCA will be carried out as part of the preparation of the next County Development Plan, due to commence in 2028

Recommendation: No modification to the Variation is required.

6.1.6 Objection to current zoning or perceived "rezoning"

Summary of issue: Two submissions concern lands identified as PAZ-14 and PAZ-15 (A and B) at Hazelwood. The authors state that these lands were zoned New Residential (PAZ-14) and Strategic Land Reserve (SLR) (PAZ-15) in the adopted County Development Plan.

One submission indicates that following "*critical input from the Office of the Planning Regulator and other public bodies*", the lands were "*returned to Green Belt status and this was subsequently provisionally approved by the Minister*". The submission expresses concern that the lands appear again as SLR / residential due to "*a new directive issued by the current Minister*".

The objectors further claim that the regional road serving the lands, i.e. R-286, is "*unsuited*" for additional vehicular traffic, that "*no flood risk assessment*" has been carried out for the sites and that no remediation of the lands was carried out after their use for a music festival.

Chief Executive's opinion: The sites known as PAZ-14 and PAZ-15 (A and B) appear as SLR residential lands in the Appendix to reflect the operative zoning under the Draft Ministerial Direction, which has legal effect pending completion of the Direction process. No final Direction has been issued to date.

In terms of flood risk, the three sites have been considered under the CDP Strategic Flood Risk Assessment of the Proposed Amendments to Zoning (PAZ), which concluded that PAZ-15 "*does not satisfy the Plan-Making Justification Test*" while PAZ-14 is not located in Flood Zones A or B.

Their site-specific infrastructure assessment, included in the Appendix to the Draft Variation No. 1, indicates that they are not fully serviced. Nevertheless, the sites' zoning was adopted by the Elected Members of Sligo County Council and any previous CE recommendations have been superseded upon adoption of the Plan.

However, the zoning of these sites is not the subject of the Draft Variation No. 1 of the CDP. In 2025, the current Minister has issued the *"National Planning Framework: Housing Growth Requirements – Guidelines for Planning Authorities"*, which the Draft Variation seeks to implement through text changes and SLR policy adjustments. The Draft Variation does not propose any rezoning in Sligo Town.

Recommendation: No modification to the Variation is required.

6.1.7 RZLT submissions seen as rezoning trigger

Summary of issue: Two submissions explicitly argue that a Residential Zoned Land Tax (RZLT) submission should act as a trigger or basis for rezoning under Variation No. 1.

The two landowners argue that because they made RZLT submissions for 2027, the land should be rezoned from GB to nRES in this Variation, noting that other RZLT-related sites are being rezoned from nRES to other uses.

One submission suggests that since the Variation proposes rezoning from residential to other use types, other sites should be zoned for residential uses, to compensate for the dezoned lands.

Chief Executive's opinion: The two rezoning proposals (Part IV of the Draft Variation No. 1) are based on the Planning Authority's determinations on RZLT submissions received in 2025 in relation to the Draft RZLT Map 2026. No such determinations have been reached for submissions received in 2026 on the Draft RZLT Map 2027. Therefore, no other RZLT-related rezoning proposals are made as part of the Draft Variation No. 1.

Given the potential 175% headroom provided through the "activation" of SLR lands, it is not necessary to rezone other lands in compensation for the 0.81 ha, which is the combined area of the two RZLT sites subject to the Variation.

Recommendation: No modification to the Variation is required.

6.2 Non-zoning issues

6.2.1 Requests to replace CDP Table 5.2, increase the headroom to 50%, extend the planning horizon to 2038 and update settlement targets to address housing shortfall

Summary of issue: Several submissions suggest that the Development Plan requires further updates either as part of the Variation or after the Variation is adopted.

It is stated that Table 3.2 (Core Strategy Table), which contains population and housing targets for the County's settlements, would become obsolete if only countywide housing numbers are updated while Sligo Town figures remain unchanged and no targets are extended to 2038.

One submission requests that the Draft Variation should provide a replacement for Table 5.2 (proposed to be deleted), should increase headroom to 50% and should update the housing target for Sligo Town.

Another submission explicitly requests that Draft Variation be amended to reflect the full 2038 planning horizon required by the HGR Guidelines and to apply the full 50% headroom permitted under national policy. It argues that the Variation's current 30% headroom is insufficient, results in a significant residential land shortfall, and fails to meet the long-term planning requirements set out in the Guidelines.

Applying the full horizon and headroom is stated to be essential in addressing pent-up demand, the "*shortfall of zoned land in Sligo Town*" and the town's housing target, which is considered too low.

Chief Executive's opinion: The Introduction to the Draft Variation document indicates that once the Variation process is completed, the changes will be incorporated into the CDP and any figures or references related to the modified narrative and policies will be updated. Such updates will affect the Core Strategy Table (Table 3.2 in Volume 1 of the CDP).

Table 5.2, which details the steps undertaken to calculate the County housing target based on the HSTM Guidelines, will not be updated or replaced. It will simply be deleted, as it is no longer relevant. The 2025 HGR Guidelines specify clear annual housing targets for County Sligo, without the need for calculations.

Regarding the request to reflect a planning horizon to 2038, there is no requirement in the Guidelines to consider housing targets beyond the life of the current Development Plan, i.e. beyond 2030. The next CDP, with a life of ten years, will incorporate the specified housing targets for the period 2030 to 2040.

Regarding the 50% headroom, the housing capacity of zoned lands, together with the full extent of SLR lands proposed to be "activated" through the Draft Variation, would provide sufficient land for the delivery of 11,087 units. These would represent 275% of the six-year target of 4,032 units, equivalent to a 175% headroom.

Since the new six-year housing target for the County is near-identical to the adopted one (4,032 new target vs 4,029 adopted figure), it is not considered necessary to amend the individual settlements' housing targets.

Recommendation: No modification to the Variation is required.

6.2.2 Requests to modify the IA classification or the SCA scores of certain sites

Summary of issue: Several submissions request modifications to the Infrastructure Assessment classification and/or Settlement Capacity Audit scoring assigned in the CDP for specific sites, as follows:

- **Sites PAZ-14 and PAZ-15 (Hazelwood)** – It is argued that while there is road access to the lands, the road, in its current condition, is "*totally unsuited*" for traffic associated with large-scale housing development.
- **Sites IA No. 32 and No. 34 (Shannon Eighter)** – The sites are classified as Tier 2, but there have been infrastructural improvements (Rosses Point / Ballincar WWTP upgrade, footpath completed etc.) which would make the lands developable for housing. One submission requests that the IA classification be changed from "amber" (Tier 2) to "red" (unserved) for IA Site No. 34, but this is presumably a mistake, as the arguments suggest that the request should be for "green", i.e. Tier 1.

- **Site PAZ-13 (Caltragh/Magheraboy)** – The lands are Tier 1, zoned nRES, effectively zoned SLR as a consequence of the Draft Direction. However, a higher SCA score is requested, 76 instead of 55 (as calculated in the Appendix to the Draft Variation).
- **Sites IA No. 25 and No. 29 (north of Carrowroe roundabout)** – Similar to the above, the lands are Tier 1, zoned SLR. It is requested to increase the SCA scores from 78 to 84 (Site IA No. 25) and from 59 to 81 (Site IA No. 29).

Chief Executive’s opinion: In the case of **Sites PAZ-14 and PAZ-15**, it is noted that the Infrastructure Assessment relates to the lands’ access to a public road, not to the potential of the road for carrying additional traffic. The capacity of a road to absorb the traffic generated by a proposed development will be assessed through the development management process. Large-scale housing development proposals are expected to be accompanied by Traffic and Transport Assessments. This is outside the scope of the Draft Variation.

Sites IA no. 32 and No. 34 – these sites are currently included in the Green Belt. While the stated infrastructure improvements are noted, they are not relevant in the context of the Draft Variation, which does not zone any additional lands for any type of use. A full review of the Infrastructure Assessment will be carried out in preparation for the next CDP review, in consultation with Uisce Eireann and the Roads Department of Sligo County Council.

Site PAZ-13 – upon review of the SCA scores, it was concluded that the SCA score of 55 for Site PAZ-13 is correct based on the criteria set out in Appendix A, Section A.1.2 (Criteria for the Settlement Capacity Audits) of the Sligo CDP 2024-2030.

Sites IA No. 25 and IA No. 29 – upon review of the SCA scores, it was concluded that the SCA score of 78 for Site No. 25 is correct, while the SCA score of 59 for Site 29 should be corrected and increased to 74. This would be a factual clarification, not a material alteration. The relevant submission states that both sites should obtain more points for their proximity to open space and recreational areas. However, the submission identifies the closest open space as being Markievicz Park, which is a GAA pitch, not permanently open to the public. The nearest public park is Cleveragh Regional Park.

The score of Site 29 should be increased to 74 based on an improved access to public transport (20 points instead of 10), pharmacy (10 points instead of 8), grocery shop (10 points instead of 8) and public park (2 points instead of 0).

Recommendation: No modification to the Variation is required.

In the final version of the CDP, the SCA score of IA Site No. 29 in Sligo Town should be corrected to 74 in the relevant SCA table. This correction is a factual clarification, not a material alteration.

6.3 Policy-related issues

6.3.1 Request for amendment to Policy P-SLR-1

Summary of issue: One submission argues that the wording of Policy P-SLR-1 is inappropriate and requires amendments. The objection is specifically related to the use of the phrase *“restrict development on lands included in the SLR”*, claiming that it misrepresents the intended function of Strategic Land Reserve (SLR) lands. It is suggested that this wording should be replaced with *“Consider rezoning lands included in the SLR”*.

Submitters argue the purpose of the SLR is to hold lands in reserve for future residential zoning, not to block development outright. They contend that the policy’s wording should reflect the fact that SLR lands may be considered for rezoning, where justified by infrastructure capacity or housing demand.

Chief Executive’s opinion: Policy P-SLR-1 accurately reflects the intended purpose of the Strategic Land Reserve lands within the Development Plan. The SLR designation does not permit development, unless certain conditions are met, as set out in P-SLR-2. The use of the term *“restrict development”* does not imply permanent exclusion or preclude future rezoning. Instead, it clarifies that SLR lands are not *“active”* development lands during the present plan cycle and should not be considered for residential proposals except where prospective developers can demonstrate compliance with the requirements of P-SLR-2.

P-SLR-1 signals that the lands are not required to meet the housing allocation within the current plan period. This is consistent with the Development Plan Guidelines, which require a plan-led approach to sequencing residential development, based on infrastructure assessment and settlement capacity audits.

Recommendation: No modification to the Variation is required.

6.3.2 Request for amendment to Policy P-SLR-2

Summary of issue: Two of the submissions relating to sites in Sligo Town argue that the proposed amendment to Policy P-SLR-2 is too restrictive and does not reflect the role of SLR lands under the updated housing growth requirements.

One of the submissions suggests that the phrase *“as a result of zoned land not coming forward for development due to demonstrable constraints”* be retained in P-SLR-2.

Similarly, the other submission requests the Planning Authority to *“alter the conditions for release of SLR lands in scenarios where housing targets are not being met because zoned lands are not being brought forward for development. This would be subject to development plan variation procedures and supported by an evidence base”*.

Chief Executive’s opinion: The amendments to P-SLR-2 under the Draft Variation permit the *“activation”* of any SLR lands where prospective developers can demonstrate that the lands are fully serviced or serviceable, that they are capable of delivering housing during the lifetime of the Plan and that the proposal has regard to Compact Growth policies (as set out in condition B of P-SLR-2).

It is not considered necessary to add a supplementary condition requiring prospective developers to provide evidence that third-party lands are not being brought forward for development due to demonstrable constraints.

Recommendation: No modification to the Variation is required.

7. Issues raised in submissions referring to other settlements

Five (5) submissions relate to sites located within settlements other than Sligo Town or Strandhill. These settlements are Grange, Ballincar, Ballymote and Ballygawley. Four out of the five submissions argue for rezoning of lands, based on availability of services, sustainable expansion of settlements or on a perceived shortfall of land zoned for residential uses.

One submission requests a correction to the Infrastructure Assessment classification of a specific site, while another one requests an objective or policy (as an alternative to zoning) to allow residential development on unzoned lands.

Summary table of issues raised in submissions referring to Ballincar, Ballygawley, Ballymote and Grange

Issue	Submissions raising the issue
7.1 Zoning issues	
7.1.1 Request to rezone lands from Green Belt, SLR and MIX to residential uses (nRES)	1 submission: 14
7.1.2 Request to rezone lands from Green Belt and Open Space to Rural Village (RV)	1 submission: 15
7.1.3 Request to rezone land from Green Belt to Strategic Land Reserve (SLR)	1 submission: 17
7.1.4 Sequential development / compact growth arguments in support of rezoning lands	2 submissions: 15, 17
7.1.5 Claims that certain sites are fully serviced or serviceable used to justify rezoning requests	3 submissions: 14, 15, 52
7.2 Non-zoning issues	
7.2.1 Request to correct the IA classification of a site	1 submission: 8
7.2.2 Request for backland access facilitation	1 submission: 14
7.3 Policy-related issues	
7.3.1 Request for a specific objective or policy allowing unzoned lands to be used for residential development	1 submission: 52

7.1 Zoning issues

7.1.1 Request to rezone lands from Green Belt, SLR and MIX to nRES

Summary of issue: One submission calls for the rezoning of lands currently designated as Green Belt / Strategic Land Reserve (SLR) and mixed uses (MIX) to residential uses (nRES).

This request relates to a site at Cloontyrocklis, Grange, which is described as fully serviced and close to the Grange WWTP, important for facilitating backland development and suitable for residential development. It is argued that the site would “provide a coherent and sustainable expansion” of the village.

The submission further states that a Natura Impact Statement (NIS) prepared in July 2024 for a related planning application concluded that development would not adversely affect nearby European Sites.

Chief Executive’s opinion: The site at Cloontyrocklis is effectively zoned partly for tourism (TOU), not SLR, due to the Draft Ministerial Direction, which affected the adopted SLR (RES) zoning on IA Site No. 6, previously identified as PAZ-49. The remaining portion is included largely in the green belt (GB), with a very small MIX area at the southern end.

The rezoning requested is noted. However, it falls outside the scope of the Draft Variation No. 1, which does not propose any rezoning in the County (other than those required following RZLT 2026 determinations). The future zoning of sites affected by the Draft Ministerial Direction will be determined by the Minister through issuing a final Direction.

Recommendation: No modification to the Variation is required.

7.1.2 Request to rezone lands from Green Belt and Open Space to Rural Village (RV)

Summary of issue: One submission calls for the rezoning of lands currently designated as Green Belt and Open Space to rural village (RV).

This request relates to a site at Ballincar, which is described as serviceable within the lifetime of the plan and ‘represents a logical, sequential, and sustainable extension of Ballincar’. It is stated that the lands “were previously put forward for rezoning during the Draft Development Plan process; however, the Chief Executive’s recommendation did not support rezoning at that time, citing concerns relating to sequential approach, servicing status, access arrangements, pedestrian infrastructure, and wastewater servicing commitments. Since then, these constraints have materially changed and/or can be resolved”.

The submitter’s client is preparing a planning application on adjacent lands, proposing upgrades that include footpath and lighting, improved access and pedestrian connectivity, thus facilitating the opening up of the subject lands.

In addition, the submission states that the lands are suitable for RV zoning because they are “contiguous to existing and proposed residential development and pre-existing zoned lands”, there are no known constraints or flood risk and represent “a natural infill opportunity that would consolidate the village form, reinforce settlement coherence, and deliver development in a planned and sequential manner”.

Chief Executive’s opinion: While it is acknowledged that some currently unserviced sites may be serviced during the lifetime of the Development Plan, the Draft Variation No. 1 does not reopen the

IA and SCA for Ballincar or any other settlement in County Sligo. A full reassessment will be undertaken as part of the next Development Plan review, due to commence in 2028.

The rezoning request is outside the remit of the Draft Variation No. 1, which does not propose any rezoning in the County other than those required following RZLT determinations.

Recommendation: No modification to the Variation is required.

7.1.3 Request to rezone land from Green Belt to Strategic Land Reserve

Summary of issue: One submission seeks the rezoning of approximately 3.02 hectares of land to the south of Ballymote from Green Belt (GB) to Strategic Land Reserve (SLR).

The submission argues that the subject site is suitable for residential zoning, as it is contiguous to existing and proposed residential development and pre-existing zoned lands, have ***“no known constraints in terms of flood risk”***, is serviceable within the lifetime of the Plan and represents *“a natural infill opportunity that would consolidate the town form, reinforce settlement coherence, and deliver development in a planned and sequential manner”*.

The rezoning request is illustrated with a proposed masterplan layout for two sites in the same clients' ownership, one currently zoned nRES and OS, the other one being the GB site subject to the current submission.

Chief Executive's opinion: The site has been subject to a previous rezoning request (through a submission on the Draft Development Plan). The rezoning, initially endorsed by the Chief Executive, was opposed by the Office of Public Works, which found that the lands were affected by flood risk and had not satisfied the Plan Making Justification Test.

As indicated above, a full reassessment in terms of infrastructure availability and a revised Settlement Capacity Audit (including consideration of flood risk) will be carried out as part of the next Development Plan review, due to commence in 2028.

The rezoning request is not within the scope of the Draft Variation No. 1, which does not propose any rezoning in the County other than those required following RZLT determinations.

Recommendation: No modification to the Variation is required.

7.1.4 Sequential development / compact growth arguments in support of rezoning lands

Summary of issue: Several submissions base their rezoning requests on the argument that the subject lands are contiguous to built-up areas or zoned lands and would support sequential development and compact growth of existing settlements.

Chief Executive's opinion: The requests for rezoning, including those based on the argument of compact growth, fall outside the scope of the Draft Variation No. 1, which does not propose any rezoning in the County other than those required in response to RZLT submissions.

Recommendation: No modification to the Variation is required.

7.1.5 Claims that certain sites are fully serviced or serviceable used to justify rezoning requests

Summary of issue: Several submissions base their rezoning requests on claims that the respective sites are fully serviced. The subject sites are located in Grange, Ballincar, Ballymote and Castle Dargan (Ballygawley).

Chief Executive's opinion: A full reassessment of settlements in terms of infrastructure availability, together with revised Settlement Capacity Audits, will be carried out as part of the next Development Plan review, due to commence in 2028.

The Draft Variation does not propose any rezoning in the County other than those required in response to RZLT submissions.

Recommendation: No modification to the Variation is required.

7.2 Non-zoning issues

7.2.1 Request to correct the IA classification of a specific site

Summary of issue: One submission requests a modification to the Infrastructure Assessment classification assigned in the CDP for IA Site No. 4 (Grange). It is argued that there is no “*kerbed and paved pedestrian infrastructure*” serving the site, no safe pedestrian linkage to the village core and no continuous public footpath along the site frontage.

It is requested that the Tier 1 classification and description of the site as “fully serviced” be corrected to reflect the lack of pedestrian infrastructure.

Chief Executive's opinion: It is acknowledged that the site is not served by a footpath. However, there is sufficient space to facilitate such infrastructure, making the site serviceable within the life of the Plan. The IA should be corrected to accurately reflect the current availability of infrastructure.

Recommendation: No modification to the Variation is required.

In the final version of the CDP, the Infrastructure Assessment classification for IA Site no. 4 in Grange should be corrected to indicate the absence of a footpath, resulting in a Tier 2 status of the site. This factual correction does not constitute a material alteration.

7.2.2 Request for backland access facilitation

Summary of issue: One submission contends that changes to specific zonings in Grange would facilitate backland access and thus the development of the wider area.

Chief Executive's opinion: The potential for facilitating access to backlands via the specific site is noted. However, access arrangements to lands, and internal circulation within settlements, are outside the scope of the Draft Variation No. 1.

Recommendation: No modification to the Variation is required

7.3 Policy-related issues

7.3.1 Request for a specific objective or policy allowing unzoned lands to be used for residential development

Summary of issue: One submission requests the inclusion of a specific objective or policy for lands at Castle Dargan *“to allow these lands come forward for residential development subject to normal planning considerations”*.

It is argued that *“the lands at Castle Dargan are fully serviced; are readily available for residential development; and offer significant potential in the delivery of new housing targets”*. The submitters ask the Planning Authority to reconsider its *“over reliance”* on the Strategic Land Reserve and give *“an opportunity to come forward”* to sites that *“meet the ‘serviced or readily serviced’ criteria”*.

Chief Executive’s opinion: The lands at Castle Dargan are located outside Ballygawley, a village which is not currently serviced, is not zoned for residential uses or other types of development and does not have a housing allocation.

The policy changes proposed by the Draft Variation are restricted to lands with an effective SLR zoning. The inclusion of a separate, site-specific policy or objective allowing lands at Castle Dargan to be used for residential development would equate to zoning these lands.

This zoning request is outside the scope of the Draft Variation No. 1.

Recommendation: No modification to the Variation is required.

8. Submissions which do not address the Draft Variation No. 1

Two of the 73 valid submissions received do not fall within any thematic groupings of this Report. They make general observations that do not relate to any specific element of Draft Variation No. 1 and therefore do not warrant changes to the Variation.

8.1 Submission 57

Summary: The submission raises general concerns regarding premature site clearance and ground disturbance occurring prior to the completion of environmental, ecological or archaeological assessments. It emphasises the importance of robust baseline surveys to ensure informed planning decisions, particularly in sensitive environments, and calls for strong policy emphasis on undertaking such assessments before development proposals proceed.

The author does not mention any element of the Draft Variation No. 1 and does not refer to any settlement, land designation or Development Plan policy.

Chief Executive's opinion: The matters referred to pertain to development management practices and statutory assessment requirements, which are already comprehensively addressed through existing Development Plan policies, national guidance, and legislative provisions governing environmental, ecological and archaeological assessment.

The Draft Variation No. 1 does not amend or weaken these requirements and does not introduce new provisions that would alter the existing assessment framework. The concerns raised do not arise from the Draft Variation.

Recommendation: No modification to the Variation is required.

8.2 Submission 61

Summary: Iarnród Éireann (IÉ) welcomes the Draft Variation and provides general observations on rail infrastructure, rail corridor protection, and future rail investment in County Sligo, with reference to national strategies such as the All-Island Strategic Rail Review and the Rail Projects Prioritisation Strategy.

IÉ emphasises the importance of safeguarding rail corridors and infrastructure where lands adjacent to the railway may be considered for future development.

The submission does not mention any element of the Draft Variation No. 1 and does not refer to any settlement, land designation or specific Development Plan policy.

Chief Executive's opinion: Iarnród Éireann's offer of continued engagement is noted and welcomed. The matters raised by Iarnród Éireann are general transport and infrastructure considerations, already addressed through the transport policies of the Development Plan and through development management processes (including statutory referrals). These policies and procedures remain in force and are not altered by the Draft Variation.

Recommendation: No modification to the Variation is required.

9. Overall recommendation of the Chief Executive

In response to the issues raised in submissions received during public consultation, the Chief Executive **recommends that the Variation No.1 of the Sligo CDP be made/adopted with the following minor modifications** to the proposals contained in Parts I and III of the Draft Variation.

Modification 1 - Part I of the Draft Variation

In the proposed replacement to Section 3.1.3 in Chapter 3 of the CDP, modify the text as follows:

text to be deleted ~~in blue double-strikethrough type~~

text to be inserted **in bold, green, larger type**

3.1.3 Consistency with national housing growth requirements

New guidance on the implementation of the NPF was published in July 2025 in the form of “Housing Growth Requirements – Guidelines for Planning Authorities” (HGR Guidelines). These are Section 28 Ministerial Guidelines in accordance with the Planning and Development Act 2000 (as amended).

The HGR Guidelines translate the national and regional projections contained in the NPF (First Revision 2025) to annual housing growth requirements for each county. The new annual housing growth requirement to ~~2034~~ **2030** for County Sligo is 672 units per year, i.e. ~~4,032~~ **3,360** units for the **remaining five-year** ~~six-year~~ life of the current Development Plan.

It is a *Policy and Objective* of the HGR Guidelines that an additional provision of up to 50% be incorporated into the Development Plan over and above the new housing requirement for the Plan period. Applying the full 50% additional provision to the housing requirement for County Sligo results in an annual housing requirement of 1,008 units, i.e. ~~6,048~~ **5,040** units over ~~six~~ **five years, from 2026 to 2030.**

Taking account of the housing capacity of lands zoned for residential and mixed uses, together with the full extent of the Strategic Land Reserve, the County Development Plan (as varied) zones sufficient land to accommodate the housing growth requirements (inclusive of the 50% additional provision) over its lifetime to 2030.

Modification 2 - Part III of the Draft Variation

In the proposed changes to the Strategic Land Reserve policies, modify the text as follows:

text to be deleted is shown ~~in double strikethrough type~~

text to be inserted is shown **in bold, green, larger type**

Strategic Land Reserve policies

It is the policy of Sligo County Council to:

P-SLR-1 Restrict development on lands included in the Strategic Land Reserve, which are shown on the Zoning Maps pertaining to the towns and villages plans contained in this CDP.

~~P-SLR-2~~ Exceptions to the above policy will only be considered in the following circumstances:

- ~~A.~~ The lands have been identified for the provision of social and affordable housing as part of the Local Authority Housing Delivery Action Plan **OR**
- ~~B.~~ There is factual evidence that such lands are ~~have become~~ fully serviced in terms of water supply, wastewater and transport infrastructure, **or have the reasonable potential to become fully serviced through the planning application process, and this potential can be clearly demonstrated at pre-application stage.**

~~Any proposal for residential or mixed-use development (including residential) on such lands must have regard to the Compact Growth policies set out in Section 10.4, Chapter 10 (this chapter) of the Development Plan.~~

~~The proposal must also demonstrate capability to deliver residential development within the lifetime of the Plan, thus facilitating progress towards the housing targets for the respective settlement.~~

Corrections to the Infrastructure Assessment and Settlement Capacity Audit scores

The Chief Executive is also indicating that minor corrections should be made to the infrastructure assessment (IA) or Settlement Capacity Audit (SCA) scores of two sites referred to in the Appendix to the Draft Variation.

Sligo Town: In the final version of the CDP, the Settlement Capacity Audit score of IA site no. 29 (located west of Pearse Road opposite Sligo Retail Park) should be corrected in the relevant SCA table. The score should be increased to 74 based on an improved access to public transport (20 points instead of 10), pharmacy (10 points instead of 8), grocery shop (10 points instead of 8) and public park (2 points instead of 0).

Grange: In the final version of the CDP, the Infrastructure Assessment classification for IA Site no. 4 in Grange should be corrected to indicate the absence of a footpath, resulting in a Tier 2 status of the site, instead of Tier 1.