



Sligo County Council
Comhairle Chontae Shligigh

Sligo.

Third Chief Executive's Report

on submissions relating to the Proposed Amendments
of the Draft Sligo CDP 2024-2030



Volume 1

Introduction, Executive Summary and Response to prescribed bodies

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- 1. Supplementary Infrastructural Assessment and Settlement Capacity Audit relating to the Proposed Amendments to Zoning**
- 2. Final Chief Executive’s recommendations on text amendments (list)**
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- 4. Corrections to the Draft Plan (list)**

1. Introduction

1.1. Preparation of a new Development Plan – progress to date

In accordance with current legislation, not later than four years after the making of a development plan, a planning authority must give notice of its intention to review its existing development plan and to prepare a new development plan for its area.

Four years after adopting the CDP 2017-2023, Sligo County Council commenced the review of its Development Plan.

A proposed Draft Sligo CDP 2024-2030 was circulated to the elected members on 14 September 2023. At a special meeting on 2 October 2023, the Members approved the Draft CDP for publication, without modifications. The Draft Plan and accompanying documents were published for consultation from 13 October to 22 December 2023. The (Second) Chief Executive's Report on the outcome of the consultation was submitted to the Members on 22 March 2024.

At their Special Meetings of 15 and 22 April 2024, the Members resolved to propose 308 amendments to the Draft CDP 2024-2030.

The Proposed Amendments and accompanying environmental assessments (SEA, AA, SFRA) were published for the third (and last) round of consultation from 7 June to 5 July 2024.

A total of **90 valid submissions** were received by the consultation deadline. All submissions were published on the Council's consultation website and remain available to read or download from <https://consult.sligococo.ie/en/node/1569/submissions>

1.2 Third Chief Executive's Report – statutory framework

Section 12(8) of the Planning and Development Act 2000 (as amended) requires the Chief Executive of a Planning Authority to prepare a report on submissions received in relation to the Proposed Amendments and submit it to the elected members for their consideration.

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

- a. list the persons or bodies who made submissions or observations;
- b. provide a summary of the following:
 - the "recommendations, submissions and observations" made by the Office of the Planning Regulator;
 - the submissions and observations made by any other persons.
- c. give the response of the Chief Executive to the issues raised, taking account of the directions of the members of the authority, the proper planning and sustainable development of the area, the statutory obligations of any local authority in the area and any relevant policies or objectives for the time being of the Government or of any Minister of the Government.

The **Development Plan Guidelines for Planning Authorities** (2022) clarify that the submission of the OPR must be presented at the start of the Report.

All other submissions are to be summarised and addressed in a clear and succinct manner, to facilitate consideration by the elected members.

1.3 Structure of this Report

The **Third Chief Executive's Report** consists of three volumes and four appendices. The contents of the volumes and appendices are detailed below.

Volume 1

Section 2 of the Report presents an **Executive Summary**, which outlines the main issues raised in submissions.

Section 3 contains the **List of persons and organisations that made submissions on the Proposed Amendments**, indicating the Proposed Amendment(s) referred to in each submission.

Section 4 of this report contains the comments and recommendations made by the **Office of the Planning Regulator** (Submission 80), together with the Chief Executive's response and recommendations relating to the Proposed Amendments highlighted by the OPR.

Section 5 addresses the comments and recommendations made by the **Northern and Western Regional Assembly's submission** (78).

Section 6 addresses the nature conservation and archaeology-related recommendations and observations made by the **Development Applications Unit (DAU)** on behalf of the **Minister for Housing Local Government and Heritage** (Submission 84).

Section 7 of the report presents the summaries of recommendations received from **prescribed bodies**, other than the OPR, NWRA and Minister for HLGH, and two **other state agencies**.

Section 8 provides an overview of the submissions which do not relate to any of the Proposed Amendments.

Volume 2

The **second volume of the Report** consists of the Chief Executive's final recommendations in relation to each of the **222 Proposed Amendments (PA) to the text of the Draft Plan**, including its Appendices and the accompanying documents (environmental reports, Local Transport Plan).

Volume 3

The **third volume of the Report** consists of the Chief Executive's final recommendations in relation to each of the **86 Proposed Amendments to Zoning (PAZ)** in the County's towns and villages.

It is strongly recommended to read this Report in conjunction with the [Draft Plan](#), the [Second Chief Executive's Report](#) and the [Proposed Amendments](#) documents.

Appendix 1 contains the Supplementary Infrastructure Assessment and Settlement Capacity Audit relating to the Proposed Amendments to Zoning (PAZ)

Appendix 2 contains a list of the final Chief Executive's Recommendations to the text of the Draft Plan

Appendix 3 contains a list of the final Chief Executive's Recommendations to zoning in the Draft Plan

Appendix 4 contains a list of corrections to the Draft Plan.

1.4 Format of the Chief Executive's recommendations

The Proposed Amendments to the text of the Draft Plan (PA) and proposed Amendments to Zoning (PAZ) are addressed in numerical order in Volumes 2 and 3, respectively.

For each Proposed Amendment, the CE Report includes a table containing all relevant information: description, source, assessments carried out and summaries of submissions received (if any).

All summaries of submissions include a link to the Council's Consultation Portal, to facilitate the viewing or downloading of the integral versions, as made by the public during the consultation period.

Where applicable, the PA or PAZ table includes the CE response to submissions.

The final Chief Executive's recommendations state whether the Development Plan should be **MADE** (adopted) **WITH** the Proposed Amendment, with a **MODIFIED** Proposed Amendment or **WITHOUT** the Proposed Amendment.

Section 12(10)(c) of the Planning Act specifies that a further modification to a proposed amendment:

- **may be made where it is minor in nature** and therefore not likely to have significant effect on the environment or adversely affect the integrity of a European site;
- **shall not be made where it relates to an increase in the area of land zoned for any purpose.**

All the Chief Executive's recommendations for further modifications involve only minor modifications.

Where it is recommended to modify the text of a Proposed Amendment, this is indicated as follows:

text proposed to be added is shown in green like this

text proposed to be deleted is shown in red/strikethrough font like this

1.5 The role of the elected members

Deciding whether to accept (or otherwise) amendments to the Draft Plan is a function reserved for the elected members of Sligo County Council.

Section 12(10)(a) of the Act indicates that:

"The members of the authority shall, by resolution, having considered the Chief Executive's Report, make the plan with or without the proposed amendment that would, if made, be a material alteration, except that where they decide to accept the amendment they may do so subject to any modifications to the amendments as they consider appropriate, which may include the making of a further modification to the alteration and paragraph (c) shall apply in relation to any further modification"

(refer to the explanations regarding allowable “further modifications” in Section 1.4 above).

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

- The Draft CDP – Volumes 1 to 4
- The Proposed Amendments to the Draft CDP
- The Environmental Report (SEA ER) and the additional ER in respect of the Proposed Amendments
- The Natura Impact Report (AA)
- The Strategic Flood Risk Assessment Report (SFRA), including the additional assessment in respect of the Proposed Amendments
- The Chief Executive’s final recommendations contained in this Report

Section 12(11) of the Act 2000 states the following:

“In making the development plan ... the members shall be restricted to considering the proper planning and sustainable development of the area to which the development plan relates, the statutory obligations of any local authority in the area and any relevant policies or objectives for the time being of the Government or any minister of the Government.”

The resolution recorded must be clear and precise as to the decision of the Council in making the Plan in accordance with Section 12(10) of the Act.

The new Development Plan becomes operational **six weeks after the date of its adoption.**

1.6 What happens next?

Upon adoption of the new Development Plan

The Development Plan Guidelines (2022) indicate that once the elected members have made the Development Plan, further work remains to be undertaken to comply with the legislation.

The Council must publish a notice in a newspaper circulating in the area and must inform the Minister, the OPR, prescribed authorities, adjoining planning authorities, An Bord Pleanála and the Local Community Development Committee (LCDC).

It is a specific requirement of the Guidelines that the Planning Authority notify the Office of the Planning Regulator within 5 working days of the making of the Development Plan and send a copy of the written statement and maps.

The new Plan must also be made available for inspection within the 5-day framework, at least in the form of an “interim version”, i.e. the Draft Plan plus the Adopted Amendments (written statement and maps),

Post-adoption SEA requirements

As soon as may be following adoption of the Plan, the Council must publish a statement which summarises how environmental considerations have been integrated into the Plan, and how consultation with prescribed environmental authorities and the public has been taken into account during Plan preparation.

After the new Plan comes into operation, the monitoring of its environmental effects will commence, will continue for the duration of the Plan and will inform the next plan review process.

1.7 The roles of the OPR and of the Minister

During the Plan review process

The OPR has provided statutory recommendations at each stage of consultation in the Plan review process. Such recommendations have specified how the Plan should address legislative and policy matters, particularly consistency with:

- the National Planning Framework
- the Regional Spatial and Economic Strategy of the NWRA
- Planning Guidelines issued by the Minister under Section 28 of the Planning Act
- any other relevant legislative and policy matters

The Development Plan Guidelines indicate that planning authorities should “endeavour to comply with any recommendations made by the OPR”, which has an “independent, expert oversight role” in the evaluation of the development plan preparation process.

After the Plan is adopted

If the Council decides **not to comply with a recommendation of the OPR**, it must notify the Office setting out reasons for such decision.

Where the OPR considers (within 4 weeks of the making of the Plan) that the adopted Plan has not been made in a manner consistent with the recommendations of the Office and “*fails to set out an overall strategy for the proper planning and development of the area*”, **the OPR may issue a notice to the Minister** under section 31AM (8) of the Planning Act, recommending the **issuing of a draft direction under Section 31 of the Act**, requiring the Council to take specified measures in relation to the Development Plan.

The Ministerial Direction process

After consideration of the notice and recommendations of the OPR, the Minister may issue a draft direction to the Council (within 6 weeks of the making of the Plan), including stated reasons for such direction.

The direction process provides for public consultation, elected members’ input (both to the Chief Executive and to the OPR), as well as review of the initial draft direction before the final direction is made by the Minister.

Until such time as the matter is determined and a final direction issued, the part or section of the approved development plan that is subject to the draft direction, does not have effect.

Where the Minister disagrees with the recommendation of the OPR and decides not to issue a draft direction, the Minister must prepare stated reasons for doing so and lay such reasons before each House of the Oireachtas.

Sligo County Council must adhere to the statutory process set out in the Planning and Development Act 2000 (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 process

1. *Give notice of Development Plan review to the public and the prescribed bodies (30 July 2021)*
2. *Pre-draft consultation (30 July to 24 September 2021)*
3. *First Chief Executive's Report on submissions and observations submitted to members (22 December 2021)*
4. *Members direct the Chief Executive to prepare the Draft CDP 2023-2029 (7 March 2022)*
5. *Preparation of Proposed Draft Plan*
6. *Consideration of Proposed Draft Plan by members (September-October 2023)*
7. *Members accept the Proposed Draft Plan (2 October 2023)*
8. *Give notice of publication of the Draft Plan to the public and the prescribed bodies (10-12 October 2023)*
9. *Draft Plan on public display for over 10 weeks (13 October to 22 December 2023)*
10. *Second Chief Executive's Report on submissions and observations submitted to members (22 March 2024)*
11. *Members resolve to proposed amendments to the Draft Plan at their Special Meetings of 15 and 22 April 2024*
12. *Publication of notice on Determination of requirement for SEA and AA of Proposed Amendments (May 2024)*
13. *Publication of Proposed Amendments for consultation (7 June to 5 July 2024)*
14. *Third Chief Executive's Report on submissions and observations submitted to members (6 September 2024) – **WE ARE HERE***
15. *Members make the Plan with or without the proposed amendments*
16. Publish notice that the new Plan is made, notify the OPR and prescribed bodies
17. The new CDP becomes operational six weeks after its adoption

Section 2.

Executive Summary

2.1 Public consultation on the Proposed Amendments

During the public consultation period, which started at 9 a.m. on 7 June 2024 and ended at 4 p.m. on 5 July 2024, a total of 90 submissions were received. The majority of submissions (76) were made through Sligo County Council's Consultation Portal, where all submissions have been published and remain available to the public at <https://consult.sligococo.ie/en/consultation/proposed-amendments-draft-sligo-county-development-plan-2024-2030>

2.2 Submissions from Prescribed Bodies

Before commencing public consultation, the Development Planning Unit of Sligo County Council notified twenty-nine (29) authorities prescribed by the Planning Regulations (Art. 13) for the purposes of Section 11, 12 and 13 of the Planning and Development Act 2000 (as amended).

Only fourteen (14) Prescribed Bodies returned comments on the Draft Plan, including the Office of the Planning Regulator, the NWRA and the Department of Housing, Local Government and Heritage. The most comprehensive submission was received from Uisce Éireann, which provided detailed, up-to-date information, extremely useful in formulating final recommendations on the Proposed Amendments.

OPR and NWRA submissions

The OPR and the NWRA made largely positive submissions, accompanied by specific comments on certain Proposed Amendments. Of the OPR's eight "MA recommendations", five relate to Proposed Amendments to Zoning in the County's towns and villages.

The NWRA expressed a high degree of satisfaction regarding the manner in which its previous submission was addressed by the Council. It also included comments on Proposed Amendments to Zoning, similar to those of the OPR.

2.3 Submissions received from the public

Of the 90 valid submissions, 74 were made by individuals, community groups, business organisations, developers and planning consultants. Comments relate overwhelmingly to Proposed Amendments to Zoning (PAZ), in particular to lands located in Sligo Town, Strandhill and Easky.

2.4 Chief Executive's Final recommendations

On foot of the 90 submissions received, and having regard to the environmental assessments carried out in respect of the Proposed Amendments, the Chief Executive has recommended that the final Development Plan should be made with **260 of the 308 Proposed Amendments**.

Section 3.

List of persons and organisations that made submissions on the Proposed Amendments to the Draft Sligo CDP 2024-2030

The public consultation commenced on 7 June 2024 and ended on 5 July 2024.

The **fifteen (15) submissions made by Prescribed Bodies** (highlighted in yellow) are addressed in **Volume 1** of this Report.

All other submissions are addressed in **Volume 2** and **Volume 3** of the Report, in numerical order.

Volume 2 contains the Chief Executive's response to proposed amendments to the **text** of the Draft Plan (PA). Volume 3 contains the Chief Executive's response to proposed amendments to **zoning** in the Draft Plan (PAZ).

Ref. no.	Date received	Name of person who signed the submission	on behalf of (where applicable)	Proposed Amendment(s) mentioned in submission
1	7 June	Cian O'Mahony	SEA Section, EPA	None (standard submission)
2	12 June	Geoff Hynes Inspector, COMAH, Chemical Production & Storage Unit	Health and Safety Authority (HSA)	None (comments not related to any PA)
3	18 June	Francis Clancy	n/a	PAZ-57 (Strandhill)
4	18 June	Laura Dunleavy	n/a	PAZ-57 (Strandhill)
5	19 June	Tom Cafferkey	n/a	PAZ-57 (Strandhill)
6	21 June	Ronan Keane	n/a	PAZ-57 (Strandhill)
7	22 June	Hazel Feeney	n/a	PAZ-57 (Strandhill)
8	23 June	Sinead McDermott	n/a	PAZ-57 (Strandhill)
9	23 June	Tommy Lynch	n/a	PAZ-57 (Strandhill)
10	24 June	Alan O Kelly	n/a	PAZ-57 (Strandhill)

Ref. no.	Date received	Name of person who signed the submission	on behalf of (where applicable)	Proposed Amendment(s) mentioned in submission
11	24 June	Maria Dorai-Raj	n/a	PAZ-57 (Strandhill)
12	24 June	Jamie Bain	n/a	PAZ-57 (Strandhill)
13	24 June	Aonghus Collins	n/a	PAZ-57 (Strandhill)
14	25 June	Aine Nic Amhlaidh	n/a	PAZ-57 and PAZ-58 (Strandhill)
15	25 June	Sinead O Sullivan	n/a	PAZ-57 (Strandhill)
16	25 June	Jamie Feeney	n/a	PAZ-57 (Strandhill)
17	25 June	Niamh McDermott	n/a	PAZ-57 (Strandhill)
18	26 June	Pat Ryan	n/a	PAZ-57 (Strandhill)
19	26 June	Mary Keady	n/a	PAZ-57 (Strandhill)
20	27 June	David Cullen	n/a	PAZ-57 (Strandhill)
21	27 June	Brian Collery	n/a	PAZ-57 and PAZ-58 (Strandhill)
22	25 June	M. Beale Pigott	n/a	None (comments not related to any PA)
23	28 June	Orlagh Cawley	Easky Enhancement Association	PAZ-62
24	30 June	Marian Dunleavy	n/a	PAZ-57 (Strandhill)
25	30 June	Aine Nic Amhlaidh	n/a	PAZ-56 (Strandhill)
26	1 July	Sheena and Alan Spencer	n/a	PAZ-62D
27	1 July	John MacDermott	n/a	PAZ-57 (Strandhill)
28	1 July	John Joe Donlon	n/a	None (comments not related to any PA)

Ref. no.	Date received	Name of person who signed the submission	on behalf of (where applicable)	Proposed Amendment(s) mentioned in submission
29	1 July	Ekaterina Henry	n/a	PAZ-57 (Strandhill)
30	1 July	Gavin Deasy	n/a	PAZ-57 and PAZ-58 (Strandhill)
31	2 July	Ronan Smyth	n/a	PAZ-57 (Strandhill)
32	2 July	Katie Sullivan Smyth	n/a	PAZ-62D
33	2 July	Joseph Morrison	n/a	PAZ-62D
34	2 July	Charles Henry	n/a	PAZ-57 (Strandhill)
35	2 July	Alan Hanlon, Statutory Plans, Forward Planning Section	Department of Education	PA-4, PA-5, PA-64, PA-99, PA-100, PA-101
36	2 July	Vladlen and Alla Vechtomov	n/a	PAZ-62D
37	2 July	Ronan Gavin	n/a	PAZ-62D
38	3 July	Patrick Coen	n/a	PAZ-15
39	3 July	Michael McCormack, Senior Land Use Planner	Transport Infrastructure Ireland (TII)	PA-33, PA-39, PA-42, PA-51, PA-54, PA-59, PA-63, PA-105, PA-107, PA-108, PA-110, PA-114, PA-136, PA-180, PA-187, PA-199, PA-202, PA-203 PAZ-41, PAZ-44, PAZ-46, PAZ-69, PAZ-70, PAZ-76
40	3 July	Hilary McPartland	n/a	PAZ-57 and PAZ-58 (Strandhill)
41	3 July	Fiona Paterson	n/a	PAZ-62D
42	3 July	John Tuohy	n/a	PAZ-57 (Strandhill)
43	4 July	Name not provided	Central Policy, Coordination and Reform, Department of Transport	PA-199, PA-203

Ref. no.	Date received	Name of person who signed the submission	on behalf of (where applicable)	Proposed Amendment(s) mentioned in submission
44	4 July	Michael Friel	Eunan Friel	PAZ-11
45	4 July	Paul Gilligan	n/a	PAZ-57 (Strandhill)
46	4 July	Denise Clarke	n/a	PAZ-62D
47	4 July	Robert Keran, RK Consulting	Beldare Homes	PA-88
48	4 July	Robert Keran, RK Consulting	Beldare Homes	PA-7, PA-15, PA-71, PA-101, PA-148, PA-162, PA-177
49	4 July	Name not provided	Strandhill Community Development Association	None (comments not related to any PA)
50	4 July	Maura Gilligan	n/a	PAZ-57 (Strandhill)
51	4 July	Name not provided	Planning Advisory Division, Department of Environment, Climate and Communications	PA-1, PA-150, PA-151, PA-152, PA-156, PA-157, PA-160, PA-161, PA185
52	4 July	Aoife O'Connor-Massingham, Town Planner	Land Development Agency	PA-88, PA-173, PA-91
53	5 July	Ian Doyle, Head of Conservation	Heritage Council	PA-8, PA-20, PA-69, PA-70, PA-80, PA-84, PA-86, PA-171, PA-172, PA-182, PA-188, PA-189, PA-190
54	5 July	Martina Keenan Rivero, McCutcheon Halley Planning Consultants	Margaret and Walter Burke	PAZ-13
55	5 July	Paul McTiernan	n/a	PAZ-82
56	5 July	Gemma Smyth	n/a	PAZ-57 (Strandhill)
57	5 July	Ciara Heffernan	n/a	PAZ-57 (Strandhill)
58	5 July	Aisling Coyne	n/a	PAZ-15 (Hazelwood, Sligo Town)
59	5 July	John Sheridan	n/a	PAZ-57 (Strandhill)

Ref. no.	Date received	Name of person who signed the submission	on behalf of (where applicable)	Proposed Amendment(s) mentioned in submission
60	5 July	Aine Nic Amhlaidh	n/a	PAZ-52
61	5 July	Colin Redding	n/a	PAZ-57 (Strandhill)
62	5 July	Anika Haget, McCutcheon Halley Planning Consultants	Gary Mullane and Alan McCarrick	PAZ-12
63	5 July	Colm Cummins, Group Property Planning Manager, Engineering and Major Projects	Electricity Supply Board	PA-69, PA-150, PA-151, PA-152, PA-153, PA-154, PA-155, PA-157, PA-158, PA-159, PA-184, PA-185
64	5 July	Louise O'Leary McCutcheon Halley Planning Consultants	Cathal O'Connor and David McMunn	PAZ-43, PAZ-44, PAZ-45
65	5 July	Francis Kelly	n/a	None (comments not related to any PA)
66	5 July	Ken Russell	n/a	PAZ-57 (Strandhill)
67	5 July	Raymond O'Malley, Kieran O'Malley & Co. Ltd.	Strandhill Golf Club	PAZ-56, PAZ-57, PAZ-58 (Strandhill)
68	5 July	Shane Carty, Carty Contractors Ltd.	Carty Contractors Ltd	PAZ-41
69	5 July	Elain Heneghan, Forward Planning Team, Asset Strategy	Uisce Éireann	PA-10, PA-13, PA-54, PA-71, PA-97, PA-138, PA-139, PA-140, PA-141, PA-142, PA-143, PA-144, PA-145, PA-146, PA-147, PA-148, PA-149, PA-162, PA-166, PA-193, PA-196, PA-205 PLUS comments on almost all PAZ
70	5 July	Michael MacAree Head of Strategic Planning	National Transport Authority	PA-39, PA-41, PA-105, PA-106, PA-131, PA-132
71	5 July	Robert Keran, RK Consulting	Altitude Distribution Ltd.	PAZ-57, PAZ-58 (Strandhill)
72	5 July	Robert Keran, RK Consulting	Omnicrost Ltd.	PAZ-58
73	5 July	Declan Brassil, Declan Brassil & Co.	Altitude Distribution Ltd.	PA-4, PA-7, PA-99, PA-101, PA-45, PAZ-14, PAZ-15, PAZ-16 (Hazelwood, Sligo Town)
74	5 July	Declan Brassil, Declan Brassil & Co.	Beldare Homes	PA-2, PA-4, PA-6, PA-11, PAZ-12, PAZ-14, PAZ-15, PAZ-16, PAZ-43, PAZ-45, PAZ-57, PAZ-58

Ref. no.	Date received	Name of person who signed the submission	on behalf of (where applicable)	Proposed Amendment(s) mentioned in submission
75	5 July	Ronan Harkin	n/a	PAZ-15 (Hazelwood, Sligo Town)
76	5 July	Frances Paterson	n/a	PAZ-62D
77	5 July	Jijing Sun	n/a	PAZ-15 (Hazelwood, Sligo Town)
78	5 July	Denis Kelly, Director	Northern and Western Regional Assembly	PA-2, PA-7, PA-10, PA-19, PA-20, PA-21, PA-23, PA-27, PA-33, PA- 34, PA-37, PA-69, PA-80, PA-82, PA-83, PA-85, PA-87, PA-95, PA- 101, PA-106, PA-115, PA-116, PA- 118, PA-119, PA-134, PA-135, PA- 136, PA-137, PA-150, PA-153, PA- 154, PA-155, PA-163 PAZ-9, PAZ-10, PAZ-11, PAZ-12, PAZ-13, PAZ-14, PAZ-15
79	5 July	Aisling McCabe	n/a	PAZ-15 (Hazelwood, Sligo Town)
80	5 July	Anne Marie O'Connor, Deputy Regulator and Director of Plans Evaluation	Office of the Planning Regulator (The OPR's recommendations state that " <i>the planning authority is required to make the Plan without</i> " the Proposed Amendments shown in red in the adjoining column)	PA-2, PA-11, PA-27, PA-105 , PA- 106, PA-180 , PA-185 PAZ-9, PAZ-10, PAZ-11, PAZ-12, PAZ-13, PAZ-14, PAZ-15 (Sligo Town) PAZ-18, PAZ-20, PAZ-21, PAZ-23 (Ballymote) PAZ-31, PAZ-32, PAZ-33, PAZ-34, PAZ-35 (Enniscrone) PAZ-37, PAZ-39 (Tobercurry) PAZ-41, PAZ-42, PAZ-43, PAZ-44, PAZ-45, PAZ-46 (Ballysadare) PAZ-56, PAZ-57, PAZ-58 (Strandhill) PAZ-59, PAZ-60, PAZ-61, PAZ-62 (Easky) PAZ-63 (Ballinafad) PAZ-64 (Ballintogher) PAZ-68 (Castlebaldwin) PAZ-73 (Cliffony) PAZ-76 (Curry)

Ref. no.	Date received	Name of person who signed the submission	on behalf of (where applicable)	Proposed Amendment(s) mentioned in submission
				PAZ-79, PAZ-80 (Gorteen) PAZ-81 (Monasteraden)
81	5 July	Robert Keran	n/a	PA-115
82	5 July	Mark Forbes, Director	MFA Consulting Engineers	PAZ-42
83	5 July	Seán O'Callaghan, Planning Officer	An Taisce, The National Trust for Ireland	PA-8, PA-12, PA-14, PA-26, PA-52, PA-58, PA-70, PA-71, PA-79, PA-81, PA-83, PA-90, PA-105, PA-106, PA-115, PA-159, PA-172, PA-187, PA-188, PA-189, PA-190, PA-191, PA-192
84	5 July	Simon Dolan Development Applications Unit (DAU)	Department of Housing, Local Government and Heritage	PAZ-4, PAZ-5, PAZ-9, PAZ-11, PAZ-13, PAZ-14, PAZ-15, PAZ-16, PAZ-58 PA-79, PA-80, PA-81, PA-82, PA-83, PA-84, PA-85, PA-86, PA-105, PA-106, PA-178, PA-188, PA-189, PA-190, PA-191, PA-192, PA-194
85	5 July	Gerry Coyne	n/a	PAZ-15 (Hazelwood, Sligo Town)
86	5 July	Alice Clark	n/a	PAZ-62
87	5 July	Margaret Doyle	n/a	PAZ-62
88	5 July	Conor Galvin, Flood Risk Management, Climate Adaptation and Strategic Assessments	Office of Public Works	PAZ-4, PAZ-15 (Sligo Town) PAZ-18, PAZ-19, PAZ-23 (Ballymote) PAZ-34 (Enniscrone) PAZ-62 (Easky) PAZ-63 (Ballinafad) PAZ-76 (Curry) PAZ-79, PAZ-80 (Gorteen)
89	5 July	Beatrice Macdonald	n/a	PAZ-14, PAZ-15, PAZ-16 (Hazelwood, Sligo Town)

Ref. no.	Date received	Name of person who signed the submission	on behalf of (where applicable)	Proposed Amendment(s) mentioned in submission
90	5 July	T W Macdonald	n/a	PAZ-14, PAZ-15, PAZ-16 (Hazelwood, Sligo Town)

Section 4.

Submission 80 – Office of the Planning Regulator

<https://consult.sligococo.ie/en/submission/slg-c44-80>

The Office has evaluated and assessed the material alterations to the Draft Plan under the provisions of sections 31AM (1) and (2) of the *Planning and Development Act 2000*, as amended, within the context of the Office's earlier recommendations and observations.

The OPR's submission contains **eight "MA Recommendations" without any additional observations.**

Recommendations issued by the Office "relate to clear breaches of the relevant legislative provisions, of the national or regional policy framework and/or of the policy of Government, as set out in the Ministerial guidelines under section 28", and that the Planning Authority is **required** to implement or address such recommendations.

The submission notes that the report of the Chief Executive, prepared for the elected members under section 12 of the Act, must summarise the Office's recommendations and the manner in which they will be addressed.

At the end of the Plan review process, the County Council is required to notify the OPR **within five working days** of its decision in relation to the material alterations to the Draft Plan.

If the Council decides not to comply with the recommendations of the Office, or otherwise makes the Plan in such a manner as to be inconsistent with the recommendations of the Office, the Chief Executive must inform the OPR accordingly and state the reasons for such decision.

The **Overview** below, which is an extract from the OPR's letter, represents a broad summary of the submission.

Overview

The Office acknowledges the work undertaken by Sligo County Council in preparing the material alterations to the draft Plan and in responding positively to the many issues raised by the Office through the **previous five recommendations and seven observations** made in the Office's submission to the draft Plan.

In particular, **the Office acknowledges the positive response of the Planning Authority to previous Recommendation 1 through the inclusion of revised housing targets in the Core Strategy** to more closely align with the Housing Supply Target Methodology Guidelines for Planning Authorities (2021) and welcomes the allocation of the additional growth to Sligo town as the Regional Growth Centre and one of the main drivers of growth for the region.

The Office also notes the **omission of the Strategic Land Reserve from the western approach to Grange Village, in accordance with previous Recommendation 2**, and the proposed **restriction of uses within the Community Facilities land use zone as required by previous Recommendation 3.**

In respect of **previous Recommendation 4, concerning renewable energy**, the Office considers the amended policy provisions to be **sufficient**.

The Office **welcomes the response of the planning authority to previous Recommendation 5, flood risk management**, which appropriately addresses the concerns of the Office.

The present submission sets out **eight (8) MA Recommendations** under five themes, as listed below.

Key theme	MA Recommendation
Zoning for residential use	MA Recommendation 1 MA Recommendation 2 MA Recommendation 3 MA Recommendation 4
Zoning for non-residential use	MA Recommendation 5
Access to national roads	MA Recommendation 6
Greenways and recreational infrastructure	MA Recommendation 7
Flood Risk Management	MA Recommendation 8

Theme 1: Zoning for residential use in towns and villages

Issue 1 – Sligo Town: Regional Growth Centre

A. The Office welcomes the proposed amendments to the Core Strategy in response to its submission to the draft Plan. In particular, the Office acknowledges “the positive response of the planning authority to Recommendation 1 through the inclusion of revised housing targets in the core strategy to more closely align with the Housing Supply Target Methodology Guidelines for Planning Authorities (2021) and welcomes the allocation of the additional growth to Sligo town as the Regional Growth Centre and one of the main drivers of growth for the region”.

CE Response

The positive comments, which relate to the proposed amendments **PA-2** (revised Core Strategy Table) and **PA-11** (revised Table 5.2/housing demand calculations), are noted.

No further modifications to PA-2, PA-11 or other sections of the Draft Plan are required.

B. The Office notes a large number of proposed additions to new residential (nRES) zoning in Sligo Town, notwithstanding that the Chief Executive determined that sufficient land was zoned in the Draft Plan to accommodate the increased housing target.

CE Response

The CE agrees with the above statement. The proposed additions to lands zoned for residential uses (nRES) amount to circa **44 ha**, representing an increase of **51%** above the area zoned for new residential uses in the Draft Plan (86.85 ha).

Assuming an average density of 35 dwellings per hectare, the 44 ha could accommodate **1,540 houses** in addition to the **2,952 units**, which is the potential yield of the lands zoned in Sligo Town for residential and mixed uses, under the Draft Plan.

This means that a total of **4,492 dwellings could be built only in Sligo Town** during the Plan period, which is more than the **4,029 units allocated through the Core Strategy to the entire County** (increased from 3,892 at the recommendation of the OPR).

The additional amount of land proposed to be zoned for residential uses in Sligo Town is considered excessive and inconsistent with the Core Strategy of the Draft Plan, as amended under PA-2 and PA-11 in response to the previous OPR submission.

C. The Office has identified a significant number of zoning amendments that are **inconsistent with the national and regional policy** framework to ensure that Sligo grows in a compact and sustainable manner and are **not required** to ensure a sufficient supply of zoned land consistent with the Core Strategy of the draft Plan.

PAZ-9, PAZ-11, PAZ-12, PAZ-13, PAZ-14, PAZ-15

The above proposed material amendments would result in additional nRES zoning either by removal from the Strategic Land Reserve (SLR), or by rezoning and inclusion in the SLR.

In terms of location, the subject lands:

- (1) are situated entirely or in majority outside the CSO Settlement Boundary, therefore inconsistent with NPO 3c, RPO 3.2(b) and RPO 3.7.39 compact growth;
- (2) are peripheral and remote sites, which leapfrog extensive lands zoned SLR and Greenbelt, thereby not following the sequential approach specified in section 6.2.3 of the *Development Plans, Guidelines for Planning Authorities (2022)* (the Development Plans Guidelines);
- (3) do not facilitate active and sustainable modes of travel, do not accord with mandatory objectives (section 10(2)(n) of the Act) to promote measures to reduce greenhouse gas (GHG) emissions, and would undermine mandatory targets for GHG emissions reduction under the *Climate Action and Low Carbon Development Act 2015*.

In terms of service infrastructure availability:

- (4) the sites subject to **PAZ-12, PAZ-14 and PAZ-15** are not serviced or serviceable (as per the IA appended to the Draft Plan);
- (5) **PAZ-11** has not been subject to an infrastructural assessment, but Uisce Éireann (UÉ) has confirmed that it is not currently serviced and that connection to water services would require a significant network extension;
- (6) while **PAZ-9 and PAZ-13** are Tier 1 serviced land, the Settlement Capacity Audit (SCA) indicates that these lands ranked poorly relative to other zoned lands in terms of sequential development and accessibility.

Further concerns:

- (7) the development of **PAZ-14** (*CE note: it should be "PAZ-13"*) might compromise the capacity and efficiency of the adjacent the N4 / Western Distributor Road / Carragh Rd (*CE note: it should be "Caltragh Rd"*) interchange (no suitable evidence has been provided to demonstrate the contrary)
- (8) **PAZ-11 and PAZ-12** are situated in the Cairns Hill / Tonaphubble area, an archaeological landscape containing Neolithic tombs, cairns and ringforts. These amendments may be inconsistent with NPO 60 and RPO 5.14 to conserve built heritage.

In terms of potential environmental effects and flood risk:

- (9) the SEA Environmental Report identified **PAZ-9, PAZ-11, PAZ-12, PAZ-13, PAZ-14 and PAZ-15** as having the potential for 'Probable conflict with status of SEOs - unlikely to be fully mitigated';
- (10) The lands subject to **PAZ 15** are located in an area at risk of flooding.

CE Response

The CE concurs with the OPR's comments and assessment.

Two typographic errors are noted under Item C(7) above: the Office's comments should refer to **PAZ-13** (instead of PAZ-14) and to Caltragh Road (instead of Carragh Road).

MA Recommendation 1 - Zoning for residential use around Sligo Town

Having regard to the provision of new homes at locations that can support compact and sustainable development and the co-ordination of land use zoning, infrastructure and services, and in particular to:

- section 10(2)(n) of the *Planning and Development Act 2000*, as amended, concerning the promotion of sustainable settlement and transport strategies and associated mandatory targets for greenhouse gas emissions reduction targets under the *Climate Action and Low Carbon Development Act 2015*, as amended;
- the core strategy of the draft Sligo County Development Plan 2024- 2030 (the draft Plan);
- NPO 3c, RPO 3.2(b) and RPO 3.7.39 compact growth;
- NPO 72a-c and associated NPF Appendix 3, tiered approach to zoning;
- the infrastructural assessment and settlement capacity audit in Appendix A of the draft Plan;
- the *Development Plans, Guidelines for Planning Authorities (2022)* in respect of the policy and objective under section 6.2.1 for zoning to be informed by the settlement capacity audit, and the policy and objective under section 6.2.3 to implement a sequential approach to zoning;
- NSO 2 and NPO 74 of the NPF, RPO 6.5 and RPO 3.7.54 of the RSES and the *Spatial Planning and National Roads Guidelines for Planning Authorities (2012)* in respect of the zoning of land at national road interchanges or junctions;
- NPO 60 and RPO 5.14 to conserve built heritage; and
- the Strategic Environmental Assessment Addendum and the Strategic Flood Risk Assessment,

the planning authority is required to make the Plan without the following material amendments around Sligo town:

- (i) **PAZ-9**
- (ii) **PAZ-11**
- (iii) **PAZ-12**
- (iv) **PAZ-13**
- (v) **PAZ-14**
- (vi) **PAZ-15**

Chief Executive's Final Recommendation

The CE concurs with the OPR's **MA Recommendation 1**.

The Plan should be made **without** the following Proposed Amendments: **PAZ-9, PAZ-11, PAZ-12, PAZ-13, PAZ-14, PAZ-15**.

Please also refer to the relevant PAZ subsections in Volume 3 of this Report for more detailed considerations on each of these Proposed Amendments.

Issue 2 - Support Towns

The Office has accepted the majority of proposed material amendments for the support towns, but recommends the omission of **ten Proposed Amendments to Zoning (PAZ)**.

PAZ-18, PAZ-20, PAZ-21, PAZ-23, PAZ-31, PAZ-32, PAZ-33, PAZ-35, PAZ-37, PAZ-39

In terms of location:

- (1) **PAZ-20 and PAZ-23** (Ballymote), **PAZ-32, PAZ-33 and PAZ-35** (Enniscrone), and **PAZ-37** (Tobercurry), are all situated outside, or almost entirely outside, the CSO Settlement Boundary for the respective towns, inconsistent with NPO 3c and RPO 3.3.
- (2) **PAZ-20, PAZ-21, PAZ-23, PAZ-31, PAZ-32, PAZ-33, PAZ-35, PAZ-37** are in peripheral and/or remote locations, which leapfrog land zoned nRES, SLR, and Greenbelt in the draft Plan, not following the sequential approach in zoning of land under section 6.2.3 of the Development Plans Guidelines.
- (3) the site subject of **PAZ-21** scored comparatively lower than other sites in the Settlement Capacity Audit appended to the Draft Plan, in terms of sequential development and accessibility.

In terms of service infrastructure:

- (4) **PAZ-18, PAZ-20, PAZ-23, PAZ-31, PAZ-32, PAZ-33, PAZ-37 and PAZ-39** were not subject to infrastructural assessment;
- (5) **PAZ-35** was determined by the planning authority to be neither Tier 1 nor Tier 2 lands.

In terms of potential environmental effects and flood risk:

- (6) the SEA Environmental Report identified **PAZ-20, PAZ-21, PAZ-23, PAZ-31, PAZ-32, PAZ-33 and PAZ-35** and as having the potential to '*probably conflict with the status of Strategic Environmental Objectives (SEO's) – unlikely to be fully mitigated*'.
- (7) the lands subject to **PAZ-23** are located in an area at risk of flooding.

CE Response

While the CE generally concurs with the above assessments, it should be noted that a number of sites have in fact been subject to infrastructural assessment as part of the Draft Plan preparation. These sites are those of **PAZ-18** (assessed under IA-7); **PAZ-20** (assessed under IA-13); **PAZ-23** (assessed under IA-16); and **PAZ-35** (assessed under IA-14).

The Supplementary Infrastructural Assessment determined that the site subject to **PAZ-39** can be classed as Tier 1 (fully serviced). However, the Supplementary Settlement Capacity Audit confirmed that the site subject of PAZ-39 scored lower than other sites in terms of sequential development.

MA Recommendation 2 - Zoning for residential use around Support Towns

Having regard to the provision of new homes at locations that can support compact and sustainable development and the co-ordination of land use zoning, infrastructure and services, and in particular to:

- section 10(2)(n) of the *Planning and Development Act 2000*, as amended, concerning the promotion of sustainable settlement and transport strategies and associated mandatory targets for greenhouse gas emissions reduction targets under the Climate Action and Low Carbon Development Act, 2015;
- the core strategy of the Draft Sligo County Development Plan 2024-2030 (the draft Plan) and NPO 18a to support the proportionate growth of rural towns;
- NPO 3c, RPO 3.2(b) and RPO 3.7.39 compact growth;
- NPO 72a-c and associated NPF Appendix 3, tiered approach to zoning;
- the infrastructural assessment and settlement capacity audit in Appendix A of the draft Plan;
- the *Development Plans, Guidelines for Planning Authorities (2022)* in respect of the policy and objective under section 6.2.1 for zoning to be informed by the settlement capacity audit, and the policy and objective under section 6.2.3 to implement a sequential approach to zoning; and
- the Strategic Environmental Assessment Addendum,

the planning authority is required to make the Plan without the following material amendments to the Support Towns:

- (i) **Ballymote - PAZ-18, PAZ-20, PAZ 21 and PAZ-23**
- (ii) **Enniscrone - PAZ-31, PAZ-32, PAZ-33 and PAZ-35**
- (iii) **Tobercurry - PAZ-37 and PAZ-39**

Chief Executive's Final Recommendation

The CE **partly** concurs with the OPR's **MA Recommendation 2**.

The Plan should be made **without** the Proposed Amendments: **PAZ-21, PAZ-23, PAZ-31, PAZ-32, PAZ-33, PAZ-35, PAZ-37 and PAZ-39**.

It is recommended that the Proposed Amendments **PAZ-18 and PAZ-20** are **included** in the final Plan for the following reasons:

- **PAZ-18** – The site the subject of PAZ-18 was included in the Initial Infrastructure Assessment carried out as part of the Draft CDP. The site is deemed to be fully serviced / Tier 1 lands. The northern portion of these lands are located in Flood Zone B and are therefore proposed to be zoned OS. Development of the remaining site for residential uses would contribute to compact growth and would follow the sequential approach to zoning.

- **PAZ-20** - The majority of the land the subject of this PAZ is located within the CSO (2016) Settlement Boundary, as confirmed by CSO Census mapping. The lands were subject to the Infrastructure Assessment carried out as part of the Draft Plan and were identified as “not fully serviced”. However, it is now accepted that the required services were put in place during the development of the lands to north-east. The lands are therefore deemed to be fully serviced / Tier 1. The site adjoins a residential area, forming part of a previously permitted development. Its zoning would facilitate the completion of an unfinished housing estate.

Please refer to the relevant PAZ subsections in Volume 3 of this Report for detailed considerations on these Proposed Amendments.

Issue 3 - Satellite Villages and Villages with Special Tourism Functions

The Office accepts the proposed material amendments to many of the Satellite Villages as reasonable but recommends the omission of **nine Proposed Amendments to Zoning (PAZ)**.

Ballysadare – PAZ-42, PAZ-43, PAZ-45, PAZ-46

In terms of location:

- (1) **PAZ-45** is outside the CSO Settlement Boundary, peripheral, not following the sequential approach to zoning under section 6.2.3 of the Development Plans Guidelines.
- (2) **In contrast, PAZ-46** proposes to include an nRES zoning within the SLR. This site **is consistent** with compact growth and follows the sequential approach to zoning.

In terms of service infrastructure:

- (3) **PAZ-42, PAZ-43, PAZ-45** were not subject to infrastructural assessment. UÉ states that **PAZ-45** would require a significant network extension to connect to wastewater services.

In terms of potential environmental effects:

- (4) the SEA Environmental Report identified **PAZ-42, PAZ-43, PAZ-45 and PAZ-46** as having the potential to ‘*Probable Conflict with status of SEOs - unlikely to be fully mitigated*’.

CE Response

The CE concurs with the above assessments.

Strandhill – PAZ-56, PAZ-57, PAZ-58

In terms of location:

- (5) **PAZ-56, PAZ-57** and most of **PAZ-58** are outside the CSO Settlement Boundary for Strandhill, in peripheral locations and do not follow the sequential approach to zoning under section 6.2.3 of the Development Plans Guidelines.

In terms of service infrastructure:

- (6) **PAZ-56** was not subject to infrastructural assessment, and UÉ states that it would require significant network extension to connect to wastewater services.
- (7) **PAZ-57 and PAZ-58** were found to be Tier 1 lands in an infrastructural assessment, but they scored rather low in the Settlement Capacity Audit, due to their lower accessibility ranking.

In terms of potential environmental effects:

- (8) the SEA Environmental Report identified **PAZ-56, PAZ-57 and PAZ-58** as having the potential to *'Probable Conflict with status of SEOs - unlikely to be fully mitigated'*.

CE Response

The CE concurs with the above assessments.

Easky – PAZ-60 and PAZ-61

The Office has significant concerns that the scale of the additional nRES zoning provided by PAZ-60, at almost 4 ha, is disproportionate, and excessive in view of the core strategy target for this small village. In contrast PAZ-61 would omit an existing nRES site of 0.31ha.

In terms of location:

- (9) **PAZ-60** is situated outside the CSO Settlement Boundary, in a peripheral location, not following the sequential approach to zoning under section 6.2.3 of the Development Plans Guidelines.
- (10) **In contrast, PAZ-61** is a brownfield site adjacent the village core, consistent with objectives for compact growth and regeneration.

In terms of service infrastructure:

- (11) **PAZ-60** was found in the infrastructural assessment to be neither Tier 1 nor Tier 2 land.
- (12) **In contrast, PAZ-61** was determined as appropriate through IA and SCA.

In terms of potential environmental effects:

- (13) the SEA Environmental Report identified **PAZ-60** as having the potential to *'Probable Conflict with status of SEOs - unlikely to be fully mitigated'*.

CE Response

The CE concurs with the above assessments.

MA Recommendation 3 - Zoning for residential use around Satellite Villages and Villages with Special Tourism Functions

Having regard to the provision of new homes at locations that can support compact and sustainable development and the co-ordination of land use zoning, infrastructure and services, and in particular to:

- section 10(2)(n) of the *Planning and Development Act 2000*, as amended, concerning the promotion of sustainable settlement and transport strategies and associated mandatory targets for greenhouse gas emissions reduction targets under the *Climate Action and Low Carbon Development Act 2015*, as amended;
- the core strategy of the draft Sligo County Development Plan 2024-2030 (the draft Plan);
- NPO 3c and RPO 3.3 compact growth;
- NPO 72a-c and associated NPF Appendix 3, tiered approach to zoning;
- the infrastructural assessment and settlement capacity audit in Appendix A of the draft Plan;

MA Recommendation 3 - Zoning for residential use around Satellite Villages and Villages with Special Tourism Functions

- the *Development Plans, Guidelines for Planning Authorities* (2022) in respect of the policy and objective under section 6.2.1 for zoning to be informed by the settlement capacity audit, and the policy and objective under section 6.2.3 to implement a sequential approach to zoning; and
- the Strategic Environmental Assessment Addendum,

the planning authority is required to make the Plan without the following material amendments to:

(i) Satellite villages

a) **Ballysadare – PAZ-42, PAZ-43, PAZ-45 and PAZ-46**

b) **Strandhill – PAZ-56, PAZ-57 and PAZ-58**

(ii) Villages with special tourism functions

Easky – PAZ-60 and PAZ-61

Chief Executive's Final Recommendation

The CE concurs with the OPR's **MA Recommendation 3**.

The Plan should be made **without** the Proposed Amendments: **PAZ-42, PAZ-43, PAZ-45, PAZ-46, PAZ-56, PAZ-57, PAZ-58, PAZ-60, PAZ-61**.

Please refer to the relevant PAZ subsections in Volume 3 of this Report for detailed considerations on these Proposed Amendments.

Issue 4 - Other Villages

The Office notes that “extensive material amendments are also proposed to include additional Rural Village (RV) zonings, including in the settlements of Ballintogher, Castlebaldwin, Cliffony, Curry and Gorteen”. The scale of the additional lands proposed to be zoned for development in each of these rural villages is inconsistent with the Core Strategy and with NPO18a to support the proportionate growth of rural towns.

The OPR recommends the omission of **six Proposed Amendments to Zoning (PAZ)**:

PAZ-64, PAZ-68, PAZ-73, PAZ-76, PAZ-79, PAZ-80

In terms of location:

- (1) **PAZ-64** (Ballintogher) and **PAZ-73** (Cliffony) are outside the respective CSO Settlement Boundaries, not following the sequential approach to zoning;
- (2) **PAZ-68** (Castlebaldwin) and **PAZ-76** (Curry) are in peripheral locations, outside the Development Limits defined in the Draft Plan, not following the sequential approach to zoning.
- (3) **PAZ-79** and **PAZ-80** (Gorteen) are within the CSO Settlement Boundary, but do not follow the sequential approach to zoning under section 6.2.3 of the Development Plans Guidelines.

In terms of service infrastructure:

- (4) **PAZ-64, PAZ-68, PAZ-73, PAZ-76 and PAZ-79** were not subject to infrastructural assessment.
- (5) **PAZ-80** was subject of an infrastructural assessment and found to be neither Tier 1 nor Tier 2 lands.

In terms of potential environmental effects and flood risk:

- (6) the SEA Environmental Report identified **PAZ-64, PAZ-68, PAZ-73 and PAZ-76** as having the potential to '*Probable Conflict with status of SEOs - unlikely to be fully mitigated*'.
- (7) the SFRA identifies **PAZ-76** as not satisfying the plan-making justification test.
- (8) the lands subject to **PAZ-76, PAZ 79 and PAZ 80** are located in areas at risk of flooding.

CE Response

The CE concurs with the above assessments.

MA Recommendation 4 - Zoning for Rural Village around Other Villages

Having regard to the provision of new homes at locations that can support compact and sustainable development and the co-ordination of land use zoning, infrastructure and services, and in particular to:

- section 10(2)(n) of the *Planning and Development Act 2000*, as amended, concerning the promotion of sustainable settlement and transport strategies and associated mandatory targets for greenhouse gas emissions reduction targets under the *Climate Action and Low Carbon Development Act 2015*, as amended;
- the core strategy of the draft Sligo County Development Plan 2024-2030 and the *Sustainable Residential Development Compact Settlement Guidelines for Planning Authorities (2024)* in respect of the policy and objective under table 3.7 that development is tailored to the scale, form and character of the settlement and the capacity of services and infrastructure;
- NPO 3c, RPO 3.2(b) and RPO 3.7.39 compact growth;
- NPO 72a-c and associated NPF Appendix 3, tiered approach to zoning;
- the infrastructural assessment and settlement capacity audit in Appendix A of the Draft Sligo County Development Plan 2023-2029;
- the *Development Plans, Guidelines for Planning Authorities (2022)* in respect of the policy and objective under section 6.2.1 for zoning to be informed by the settlement capacity audit, and the policy and objective under section 6.2.3 to implement a sequential approach to zoning; and
- the Strategic Environmental Assessment Addendum and the Strategic Flood Risk Assessment,

the planning authority is required to make the Plan without the following material amendments:

- (i) **Ballintogher - PAZ-64**
- (ii) **Castlebaldwin – PAZ-68**
- (iii) **Cliffony – PAZ-73**
- (iv) **Curry- PAZ-76**
- (v) **Gorteen – PAZ-79 and PAZ-80**

Chief Executive's Final Recommendation

The CE partly concurs with the OPR's **MA Recommendation 4**.

The Plan should be made **without** the Proposed Amendments: **PAZ-64, PAZ-68, PAZ-73, PAZ-76, PAZ-79 and PAZ-80**.

Please refer to the relevant PAZ subsections in Volume 3 of this Report for detailed considerations on these Proposed Amendments.

Theme 2 - Zoning for non-residential uses

Issue 5 – Lands zoned for employment

A. The Office **welcomes the inclusion, under PA-27, of an additional text to Section 7.3 Spatial Planning for Economic Development**, which explains the simple, evidence-based approach applied by the Planning Authority to determine that 25.2 ha of Business / Industry / Enterprise (BIE) zoned land is needed for the entire county to accommodate 60% of projected employment demand over the Plan period. It is apparent that 40% of future employment would be accommodated on other zoned lands, including town centre uses (TC1), mixed uses (MIX), tourism (TOU) and community facilities (CF), among others. The text clarifies that as the Draft Plan zones 290 ha for BIE, most of which are located strategically within the Regional Growth Centre, the Draft Plan is capable of supporting far in excess of the projected employment growth

CE Response

The positive comments are noted. **No further modification to the Draft Plan is required.**

B. PAZ-10 proposes to zone 2 ha as BIE, in the unzoned area outside Sligo Town.

In terms of location:

- (1) This remote site is circa 1.2 km outside the CSO Settlement Boundary. Its zoning would be inconsistent with compact growth, not following the sequential approach to zoning, and therefore not having regard to the sequential test for enterprise and employment land under the Development Plans Guidelines (Appendix A).
- (2) Furthermore, the peripheral location of this site means that it cannot facilitate access by active and sustainable modes of travel, therefore not according with mandatory objectives to promote measures to reduce GHG emissions (under section 10(2)(n) of the Act).

In terms of potential environmental effects:

- (3) The SEA ER identifies **PAZ-10** as having the potential for *'Probable Conflict with status of SEOs - unlikely to be fully mitigated'*.

CE Response

The CE concurs with the above assessments.

C. PAZ-34 proposes to change the zoning of 3.6 ha from Greenbelt (GB) to Tourism (TOU) outside Enniscrone

In terms of location:

- (1) The site is located outside the 2016 settlement boundary and the Development Limit for Enniscrone. Its zoning would not support the achievement of compact growth, would not represent sequential zoning and would not have regard to sequential test for enterprise and employment land under the Development Plans Guidelines (Appendix A).

In terms of service infrastructure:

- (2) The lands are neither Tier 1 nor Tier 2 and would require a 730-m network extension to connect to the wastewater system according to UÉ.

In terms of potential environmental effects and flood risk:

- (3) The SEA ER identifies **PAZ-34** as having the potential for *'Probable Conflict with status of SEOs - unlikely to be fully mitigated'*.
- (4) the lands proposed to be zoned under PAZ-34 Enniscrone are located in an area at risk of flooding.

CE Response

The CE concurs with the above assessments.

D. PAZ-41 and PAZ-44 propose to zone over 5 ha of Green Belt lands for Business / Industry / Enterprise (BIE) outside Ballysadare. PAZ-46 proposes to place 4.11 ha of BIE in Ballysadare into the Strategic Land Reserve (SLR).

In terms of location:

- (1) Unlike the lands subject of **PAZ-46**, the sites of **PAZ-41 and PAZ-44** are located outside the CSO Settlement Boundary. Their zoning would not support the achievement of compact growth, not following the sequential approach to zoning, and would not have regard to the sequential test for enterprise and employment land under the Development Plans Guidelines (Appendix A).
- (2) The sites subject to **PAZ-41 and PAZ-44** are also situated outside the defined Development Limit and access onto the public road within the 80 km/h speed limit.

In terms of service infrastructure:

- (3) Unlike the lands subject of **PAZ-46**, the sites of **PAZ-41 and PAZ-44** are neither Tier 1 nor Tier 2 lands and, according to UÉ, access to wastewater may necessitate a 900-m network extension.

In terms of potential environmental effects:

- (4) The SEA ER identifies **PAZ-41, PAZ-44 and PAZ-46** as having the potential for *'Probable Conflict with status of SEOs - unlikely to be fully mitigated'*

CE Response

The CE concurs with the above assessments.

E. PAZ-59 proposes to change 1.15 ha of land from BIE to GB, and PAZ-62 proposes to change 1.2 ha of GB land to TOU around Easky

In terms of location:

- (1) The lands subject of **PAZ-59** are **consistent with compact growth** and the sequential approach, being adjacent to the village core.
- (2) The lands subject of **PAZ-62** are remote from the CSO boundary and the defined Development Limit for Easky. The zoning would not support the achievement of compact growth, not following the sequential approach under the Development Plans Guidelines.

In terms of service infrastructure:

- (3) The lands subject of **PAZ-59** are **Tier 1 lands**. These lands are therefore well located to provide for employment uses in a sustainable, compact, and well-planned way.
- (4) The lands subject of **PAZ-62** have not been subject of an infrastructural assessment or settlement capacity audit and, according to UÉ, would require a 500-m network extension to connect to the WWTP.

In terms of potential environmental effects and flood risk:

- (5) The SEA ER identifies **PAZ-62** as having the potential for *'Probable Conflict with status of SEOs - unlikely to be fully mitigated'*
- (6) The lands proposed to be zoned under **PAZ-62** are located in an area at risk of flooding.

The Office notes that there is no evident planning reason for replacing the lands subject of PAZ-59 with those subject of PAZ-62.

CE Response

The CE concurs with the above assessments.

F. PAZ-81 proposes to change the zoning of 1.3 ha of GB to Community Facilities (CF) around Monasteraden.

In terms of location:

- (1) the lands are outside the defined Development Limit and mostly outside the village plan limit. Their zoning would not support compact growth, not following the sequential approach under the Development Plans Guidelines.

In terms of service infrastructure:

- (2) The site has not been subject of an infrastructure assessment or SCA, and UÉ states that it would require pipe upsizing for connection.

In terms of potential environmental effects and flood risk:

- (3) The SEA ER identifies **PAZ-81** as having the potential for *'Probable Conflict with status of SEOs - unlikely to be fully mitigated'*

CE Response

The CE concurs with the above assessments.

MA Recommendation 5 – Non-residential zonings

Having regard to the provision of employment at locations that can support compact and sustainable development and the co-ordination of land use zoning, infrastructure and services, and in particular to:

- section 10(2)(n) of the *Planning and Development Act 2000*, as amended, concerning the promotion of sustainable settlement and transport strategies and associated mandatory targets for greenhouse gas emissions reduction targets under the Climate Action and Low Carbon Development Act, 2015;
- RPO 3.7.39 compact growth for employment for Sligo Regional Growth Centre
- NPO 74 and the National Sustainable Outcome and Regional Growth Ambition for compact growth;
- NPO 72a-c and associated NPF Appendix 3, tiered approach to zoning;
- the infrastructural assessment and settlement capacity audit in Appendix A of the Draft Sligo County Development Plan 2023-2029;
- the *Development Plans, Guidelines for Planning Authorities (2022)* in respect of the policy and objective under section 6.2.1 for zoning to be informed by the settlement capacity audit, and the provisions for the sequential approach to zoning; and
- the Strategic Environmental Assessment Addendum and the Strategic Flood Risk Assessment.

the planning authority is required to make the Plan without the following material amendments to:

- (i) **Sligo town – PAZ-10**
- (ii) **Enniscrone – PAZ-34**
- (iii) **Ballysadare – PAZ-41, PAZ-44 and PAZ-46**
- (iv) **Easky – PAZ-59 and PAZ-62**
- (v) **Monasteraden – PAZ-81**

Chief Executive's Final Recommendation

The CE concurs with the OPR's **MA Recommendation 5**.

The Plan should be made **without** the Proposed Amendments: **PAZ-10, PAZ-34, PAZ-41, PAZ-44, PAZ-46, PAZ-59, PAZ-62 and PAZ-81**.

Please refer to the relevant PAZ subsections in Volume 3 of this Report for detailed considerations on these Proposed Amendments.

Theme 6 / Issue 6 - Access to national roads

Proposed amendment **PA-180** proposes to include text into the Plan which states:

Where direct vehicular access onto national primary roads cannot be avoided, a Departure from TII Publications Standards DN-GEO-03060 with justification shall be required.

The Office considers that PA-180 is not consistent with national and regional policy, and with the Spatial Planning and National Roads Guidelines (Section 28 guidelines), which require avoidance of additional direct vehicular access onto national primary roads.

MA Recommendation 6 - Access to National Roads

Having regard to the need to maintain the capacity and safety of the strategic road network and, in particular:

- NPO 74 to align the NPF with the NDP through the delivery of the national strategic outcomes;
- NSO 2 and RPO 6.5, concerning maintaining the strategic capacity and safety of the national roads network; and
- sections 2.5 and 2.6 of the *Spatial Planning and National Roads Guidelines for Planning Authorities* (2012), in respect of the require policy approach for access to national roads,

the planning authority is required to make the Plan without material amendment PA-180.

CE Response

Section 2.5 of the Spatial Planning and National Roads Guidelines refers to “additional access points from new development or the generation of increased traffic from existing accesses to national roads to which speed limits greater than 60 km/h apply”.

The proposed amendment **PA-180 does not relate to additional access points** from new development. There are situations where a new direct access onto a national road is unavoidable. For example, an established development (e.g. old residential property/farmhouse) with an existing access onto a national road will require a new access if the national road is realigned and there is no side road available for alternative access. Such new access is not an additional access, and is clearly unavoidable.

PA-180 indicates that in such cases, the requirements of TII’s updated standards will apply. The text proposed to be inserted in Section 33.9.1 – which was included following advice received from TII’s Sligo Regional Design Office – is extracted from TII’s publication DN-GEO-03060, which specifies, in Section 5.5. Direct Accesses, that “*Where direct vehicular access onto national primary roads cannot be avoided, a Departure from Standards with justification shall be required where a direct access is proposed. In all cases, the number of accesses on to the national road should be minimised, either by consolidating them into a single access point, or connecting them to existing side roads.* It is considered that PA-180 would benefit from clarifications instead of omission.

Chief Executive's Final Recommendation

PA-180 – In **Section 33.9.1 Access onto national roads**, make an additional minor modification to the **first paragraph** under the heading **Sight distances for access onto national roads** as follows:

Where direct vehicular access onto national primary roads cannot be avoided (such as situations arising from national road realignment schemes), a Departure from TII Publications Standards DN-GEO-03060 with justification shall be required, as provided for in Section 5.5. Direct Accesses of DN-GEO-03060. In all cases, the number of accesses on to the national road should be minimised, either by consolidating them into a single access point, or connecting them to existing side roads.

The sight distances required for access onto national primary and secondary roads are set out in Table 33.8. The sight distances are measured from the access point to the near-side edge of the carriageway in accordance with the **Design Manual for Roads and Bridges TII Publications Standards DN-GEO-03031 and DN-GEO-03060**.

Theme 7 / Issue 7 - Greenways and recreational infrastructure

The Office notes that two material amendments are proposed in respect of the routing of greenways, **PA-105 and PA-106**.

PA-106 introduces policy P-OR-23 which states:

Ensure that the routing/location, siting and design of proposed outdoor recreational infrastructure (greenways, walking and cycling paths/trails, parks and other open spaces) does not have a significant adverse impact on biodiversity.

This policy provides a clear and appropriate basis to protect biodiversity and allow individual proposals to be assessed against through the development management process in a manner which is consistent with both NPO 22 (greenways) and NPO 60 (natural heritage).

PA-105 introduces text in Section 27.7.4 stating that 'greenways should not be routed through areas of high nature value'. The submission states that this "has the potential to conflict with that policy resulting in a lack of clarity and transparency. Furthermore, 'areas of high nature value' do not appear to be defined or otherwise referenced in the draft Plan.

The Office is of the view that **PA-105 is inconsistent with NPO 22 to facilitate greenways**, and NPO 60 the protection of natural heritage in a manner appropriate to its significance.

MA Recommendation 7 - Greenways

Having regard to NPO 22 to facilitate greenways, and NPO 60 to conserve and enhance natural heritage in a manner appropriate to its significance, the planning authority is required to make the plan without material amendment PA-105.

CE response

The narrative introduced under PA-105 is intended to explain and support the proposed new policy P-OR-23 (inserted by PA-106). It is noted that the DHLGH (Submission 84), the Heritage Council (Submission 53) and An Taisce (Submission 83) welcome and support PA-105, while TII (Submission 39) recommends consultation with the Council's internal engineering staff and the NTA recommends deletion and possibly replacement with text which is "consistent with the provisions of P-OR-23".

It is acknowledged that the wording "areas of high nature value", not explained or referenced elsewhere, may be misinterpreted and should be omitted.

However, it is considered that PA-105 should be retained, with additional clarifications. This would represent a minor modification of the proposed amendment, while at the same time ensuring consistency with PA-106, NPO 22 and NPO 60.

Chief Executive's Final Recommendation

Modify **PA-105** (additional narrative under the heading **Greenways** in **Section 27.7.4 Outdoor recreational amenities**) as follows:

At the same time, greenways should not be routed through areas of high nature value, because where they can pose significant threats to biodiversity through removal of vegetation during trail development, damage during trail maintenance, inappropriate (e.g. herbicide application) or lack of management, inappropriate landscaping or unsuitable artificial lighting, introducing light into natural dark areas.

However, outdoor recreational infrastructure also has the potential to improve both ecological objectives through informed design, by protecting features such as hedgerows, grass/wildflower verges, wetlands and bridges, which are integral landscape features of a greenway corridor.

In order to ensure that significant impacts to biodiversity and nature conservation interests are avoided, Greenway/walkway proposals should be subject to rigorous route/site selection processes.

Theme 8 / Issue 8 - Flood risk management

In general, the Office welcomes the response of the planning authority to its recommendation on flood risk management issues, however the material alterations to the draft Plan include a significant number of amendments relating to the zoning of land for uses vulnerable to flooding, which sites have not passed the plan making justification test.

These include:

- **PAZ-15** in Sligo Town;
- **PAZ-18, PAZ-19 and PAZ-23** in Ballymote;
- **PAZ-23** in Enniscrone; (CE note: this should be "PAZ-34")
- **PAZ-62** in Easky;
- **PAZ-63** in Ballinafad;
- **PAZ-76** in Curry;
- **PAZ-79 and PAZ-80** in Gorteen;

Several of these proposed amendments have been addressed under other recommendations, above.

The OPR notes that the basis for the decision of the planning authority regarding the zoning of these lands is that *'the land use zoning objective reflects the existing use of the site'*. However, the Office indicates that "this is not appropriate where the lands concerned are undeveloped lands".

Any undeveloped lands in Flood Zone A should be zoned for water compatible development, and lands in Flood Zone B should be zoned for less vulnerable uses, unless all criteria of the Plan Making Justification Test can be satisfied. The subject amendments are therefore inconsistent with NPO 57 and RPO 3.1 and have not had regard to the Flood Guidelines.

CE Response

The CE generally concurs with the above assessments, except in the cases of **PAZ-18** (already addressed under the CE response to **MA Recommendation 2**).

In the last column of Table 3 of the supplementary SFRA, the last paragraph in each row indicates that "the land use zoning objective reflects the existing use of the site and therefore the zoning should be retained". The "land use zoning objectives" means the initial draft zoning objective. The recommendation that "the zoning should be retained" means **the initial draft zoning should be retained, not replaced with the proposed zoning according to the respective PAZ**.

MA Recommendation 8 - Flood risk management

Having regard to the need to manage flood risk and, in particular:

- NPO 57 and RPO 3.10 to ensure flood risk management avoids inappropriate development at risk of flooding;
- the provisions of *The Planning System and Flood Risk Management for Planning Authorities* (2009), including the plan making justification test; and
- the Strategic Flood Risk Assessment,

the planning authority is required to make the Plan without:

- (i) **Sligo Town - PAZ-15;**
- (ii) **Ballymote - PAZ-18, PAZ-19 and PAZ-23;**
- (iii) **Enniscrone - PAZ-23;** (CE note: it should be "PAZ-34")
- (iv) **Easky - PAZ-62;**
- (v) **Ballinacorney - PAZ-63;**
- (vi) **Curry - PAZ-76; and**
- (vii) **Gorteen - PAZ-79 and PAZ-80.**

Chief Executive's Final Recommendation

The CE largely concurs with the OPR's **MA Recommendation 8**.

The Plan should be made **without** the Proposed Amendments: **PAZ-15, PAZ-19, PAZ-23, PAZ-34, PAZ-62, PAZ-63, PAZ-76, PAZ-79 and PAZ-80**.

It is recommended that the Proposed Amendment **PAZ-18** is **included** in the final Plan for the reasons specified above under **MA Recommendation 2**.

Please refer to the relevant PAZ subsections in Volume 3 of this Report for detailed considerations on these Proposed Amendments.

(Section 5)

Submission 78 – Northern and Western Regional Assembly

<https://consult.sligococo.ie/en/submission/slg-c44-78>

The Assembly notes that of the 312 Proposed Amendments, many are relatively minor when seen in a regional context. These are generally supported by the Assembly.

The submission focuses on amendments of regional significance, considering their consistency – or otherwise – with the Regional Spatial and Economic Strategy.

There are four parts to the NWRA submission:

- A. comments on Sligo County Council’s response to previous Recommendations
- B. comments on Sligo County Council’s response to previous Observations
- C. comments on Proposed Amendments to the text of the Draft Plan
- D. comments on Proposed Amendments to Zoning in Sligo Town

These comments of the Assembly are summarized below following the same structure as above.

The Chief Executive welcomes all positive comments. It is noted that under Part D, the NWRA makes two observations similar to those contained in the OPR Submission 80. The CE Response and Final Recommendations relating to these observations are the same as those already stated in Section 4 of this Report.

A. Comments on the Council’s response to NWRA’s initial Recommendations

(1) Initial Recommendation 1 – Sligo Town population target for 2030

Outcome: PA-2

The Proposed Amendment **PA-2** amends **Core Strategy Table 3.2** Population Targets to 25,360 for Sligo Town Regional Growth Centre, as requested by the OPR and by the Assembly. All associated text and objectives and projections are amended accordingly. The CE Report to Members confirms that no additional zoning allocation for Sligo Town is required.

The Assembly considers that the response to this recommendation / **PA-2 gives the Plan greater consistency with the RSES.**

(2) Initial Recommendation 2 – Student accommodation

Outcome: PA-95

The Proposed Amendment **PA-95** inserts text (new Section 26.3.4) relating to student accommodation as part of the provision of housing for persons with diverse needs.

This addition to Section 26.3 as per **PA-95** **appropriately addresses the Assembly’s recommendation** and *“gives due recognition to the strategic role of the ATU for the future of the county of Sligo and the wider region”*.

(3) Initial Recommendation 3 – Serviced sites in towns and villages

Outcome: PA-19 and PA-20

PA-19 adds to the narrative of Section 6.5 Housing land provision – Ready to Build Scheme.

PA-20 includes an additional Strategic Housing objective relating to the above scheme.

The Assembly considers that **PA-19 and PA-20**, prioritising a program for the acquisition of ‘Ready to Build Scheme’ sites across towns and villages within a one year timeframe, **bring the Draft Plan line with RPO 3.7 of the RSES.**

(4) Initial Recommendation 4 – Timeframe for the Eastern Garavogue Bridge

Outcome: no proposed amendment

The NWRA has previously recommended the inclusion of a timeframe in respect of objective O-RLR-2, similar to SO-RGC-1, for the delivery of the Eastern Garavogue Bridge and Approach Roads Scheme, as per RPO 3.7.40 of the RSES.

The submission quotes the Chief Executive’s recommendation against the inclusion of such timeframe, due to variables outside the control of the Planning Authority, although the works are expected to be completed during the lifetime of the CDP 2024-2030.

The Assembly notes that it has no opportunity to make a further submission, as **there is no proposed amendment in this regard.**

CE Response

The Chief Executive wishes to re-emphasise the Council’s commitment to the delivery of the Eastern Garavogue Bridge and Approach Roads Scheme during the lifetime of the CDP 2024-2030. However, setting a rigid timeframe in the Development Plan would not help avert delays arising from circumstances outside the control of the Planning Authority. The omission of such timeframe from the Plan will not influence in any way the real-time progress on the delivery of the Scheme.

(5) Initial Recommendation 5 – Areas considered for renewable energy development

Outcome: PA-69

PA-69 includes an additional objective to prepare an updated Landscape Character Assessment for County Sligo in **conjunction with the forthcoming Renewable Energy Strategy**.

While the Assembly considers the approach to be “*not optimum*”, it confirms that **PA-69 “is a commitment to bridging a policy gap within a short timeframe, and thus represents an improvement in approach overall”**.

(6) Initial Recommendation 6 – Jobs and land zoned for BIE in Sligo RGC

Outcome: PA-23 and PA-27

PA-23 adds text relating to jobs in **Section 7.1.1. RSES Growth Ambition 1**.

PA-27 inserts an additional subsection on employment zoning in **Section 7.3 Spatial planning for economic development**.

The Assembly considers that **PA-23 and PA-27** provide “*a reasoned analysis of land required for business, industry and enterprise zoning, having regard to the envisaged population increase for the county. The approach gives justification for the current zoning allocation, which is deemed capable of supporting in excess of 2,500 industrial/ enterprise jobs. Overall, the response to this recommendation gives the Plan greater consistency with the NPF and RSES*”.

(7) Initial Recommendation 7 – Flood Risk Zones

Outcome: PA-163

PA-23 changes the text of **Section 32.1.2 Strategic Flood Risk Assessment**.

The Assembly considers that this proposed amendment “*gives the Plan greater consistency with the RSES, RPO 3.10 and RPO 3.11*”.

(8) Initial Recommendation 8 – Landscape Characterisation Map

Outcome: PA-69

PA-69 inserts a new objective, O-LCP-3, undertaking to prepare an updated Landscape Character Assessment in conjunction with the Renewable Energy Strategy.

Reiterating the comments under Recommendation 5, the Assembly deems **PA-69 “to be an acceptable approach”**.

(9) Initial Recommendation 9 – Housing vacancy rate and rural brownfield sites

Outcome: PA-21

PA-21 inserts an additional strategic housing policy, SP-HOU-4, to pursue the delivery of at least 20% of all new housing in rural areas on brownfield sites, in accordance with Regional Policy Objective RPO 3.3.

The Assembly consider that **PA-21 brings the Plan in line with the RSES.**

B. Comments on Council's response to NWRA's initial Observations

The NWRA submission on the Draft Plan contained six (6) Observations relating to:

- (1) the lack of cross-referencing in the text of the Draft Plan
- (2) the use of Census 2016 data instead of Census 2022 data
- (3) the lack of provisions for a "tourist attraction(s) of scale within Sligo Town"
- (4) the lack of a "County vision" for the lifetime of the Plan
- (5) the insufficient mention of upgrades to the TEN-T Comprehensive Network
- (6) the lack of a "Review and Implementation Strategy" for the Plan

In response to (3) and (6) above respectively, PA-119 inserts a new Tourism objective (O-TOU-2) and PA-7 introduces an additional section 3.4 Monitoring the implementation of the Plan's objectives.

The Assembly welcomes PA-7 and PA-119, notes the Chief Executive's responses to Observations (1), (2), (4) and (5) and considers that the absence of further proposed amendments will not render the Plan inconsistent with the RSES.

C. Comments on Proposed Amendments to text (PA)

In relation to the text (narrative, policies, objectives) of the Draft Plan, the Assembly notes the following Proposed Amendments:

PA-10, PA-33, PA-34, PA-37, PA-80, PA-82, PA-83, PA-85, PA-87, PA-101, PA-106, PA-115, PA-116, PA-118, PA-119, PA-134, PA-135, PA-136, PA-137, PA-150, PA-153, PA-154, PA-155

The Assembly **welcomes** all of the above Proposed Amendments and considers them to be **aligned with the ambitions of the RSES and the relevant RPOs.**

D. Comments on Proposed Amendments to Zoning (PAZ)

Sligo Town Plan

The Assembly notes that there are sixteen (16) amendments proposed to the draft zoning of Sligo Town, and seven (7) of them “*merit consideration due to the role of Sligo as a Regional Growth Centre as per RSES and NPF*”.

(1) PAZ-9, PAZ-11, PAZ-12, PAZ-13, PAZ-14, PAZ-15

The above represent “*significant amendments to the Sligo Town Plan that would constitute an increase of approximately 66.87ha. of nRES (New Residential) zoned land, primarily at the periphery of the plan area or outside the plan area*”.

The submission notes that the additional lands proposed to be zoned would generate 2,500 to 3,000 residential units, capable of housing 6,000-7,000 people above the revised population target for Sligo Town.

The Assembly does not support the zoning of additional lands for residential use under the proposed amendments listed above, for the following reasons:

- i. It is inconsistent with the Core Strategy of the Draft Plan with no appropriate rationale provided, contrary to the provisions of the Development Plan Guidelines.
- ii. The lands subject to the above PAZ are peripheral, with 36 ha of proposed zoning nRES outside the current Sligo Town Boundary, conflicting with the objective to deliver compact settlements of scale as set out in the RSES.
- iii. The above PAZ do not follow the sequential approach to the development of Sligo Town and its environs.
- iv. The lands subject to **PAZ-13** (rezoning of 27.08 ha of SLR to nRES), although within the Town Boundary, are peripheral to the built-up area; their development would constitute leapfrogging, contrary to the objective to deliver compact growth.
- v. The above PAZ are a significant departure from the RSES RPOs for Sligo Town, and in particular RPO 3.7.37, which sets an ambition for Sligo to grow to a population of 27,200 by 2040.
- vi. The implication of the above PAZ has not been considered within the context of the Local Transport Plan. These PAZ “*do not support the principle of delivering integrated land use and transport planning that will enable increased travel by sustainable transport modes and a reduction in in greenhouse gas emissions*”.

CE Response

The above comments coincide with those made by the OPR (Submission 80).

Refer to the Chief Executive’s Final Recommendation regarding the OPR’s MA Recommendation 1, in Section 4 of this Report, Issue 1 – Sligo Town: Regional Growth Centre.

(2) PAZ-10

The submission notes that this proposed amendment provides for an increase of approx. 1.96 ha of BIE (business, industry, enterprise) zoned land outside Sligo Town, at a remove from the Development Limit set out in the Draft Plan.

The Assembly considers that PAZ-10 is not consistent with the RSES and with Section 6.2.5 of the Development Plan Guidelines, because:

- i. No rationale has been provided for *“the requirement to zone additional lands based on population, economic or employment growth over the lifetime of the development plan”*;
- ii. No rationale has been provided for *“zoning the selected lands over alternative lands, including but not limited to lands at Ballytivnan and Rathbraughan, as previously referenced in the Assembly Submission to the Draft Plan”*.

CE Response

The above comments coincide with those made by the OPR (Submission 80).

Refer to the Chief Executive’s Final Recommendation regarding the OPR’s MA Recommendation 5, in Section 4 of this Report, Issue 5.B – PAZ-10

Section 6.

Submission 84 – Department of Housing, Local Government and Heritage / Development Applications Unit

<https://consult.sligococo.ie/en/submission/slq-c44-84>

The submission – coordinated by the Development Applications Unit – is made by the Department in its role as the authority with overarching responsibility for nature conservation, Birds and Habitats Directives and wider biodiversity, as well as archaeology.

The Departments' comments are summarized below in six subsections corresponding to the heading in the submission.

The Chief Executive welcomes all positive comments. Such comments are not followed by a CE Response, except for the case of PA-105, which attracted negative comments from the OPR.

It is noted that the Department makes several observations similar to those contained in the OPR Submission 80. The CE Response and Final Recommendations relating to these observations are the same as those already stated in Section 4 of this Report.

Proposed Amendments to the text of the Draft Plan

A. Biodiversity, Artificial Light at Night (ALAN), etc.

(1) PA-79, PA-80

The two proposed amendments insert narrative and policy related to biodiversity, introducing a requirement for biodiversity net gain (BNG) for certain development proposals.

The Department welcomes the Council's "strengthened commitment to protection of Sligo's Biodiversity".

(2) PA-81, PA-82

The two proposed amendments introduce a new subsection and three policies, respectively, relating to Artificial Lighting at Night (ALAN).

The Department welcomes these policies, "which will put County Sligo at the leading edge of reduction of light pollution".

(3) PA-83

The Department welcomes the commitment to restore and protect Sligo County's dark sky from adverse levels of artificial light pollution, through the examination of light pollution in the county, leading to the creation of a County Sligo Lighting Strategy within the lifetime of this CDP plan, and to encourage the use of 'dark sky friendly' lighting for all new lighting and lighting upgrades.

Minimising overall light pollution in the county, not only in identified dark areas, will make night-time spaces more pleasant for both wildlife and people.

The submission recommends the inclusion of the words “minimise Sligo County’s overall light pollution and...” in the proposed additional objective O-ALAN-1.

CE response

Agreed. The inclusion of the suggested wording would represent a minor modification to the objective, not a material change.

Chief Executive’s Final Recommendation

Modify PA-83 (new Artificial lighting at night objective in Section 24.1 Biodiversity) as follows:

Artificial lighting at night - objective

O-ALAN-1 Develop a **County Lighting Strategy** during the life of the development plan. The Strategy will include the adoption of Environmental Lighting Zones to **minimise County Sligo’s overall light pollution** and ensure that the appropriate lighting levels are used in each zone, with protection for identified dark areas.

(4) PA-84, PA-85, PA-86, PA-188, PA-189, PA-190, PA-191, PA-192

These proposed amendments represent further additions to the biodiversity and nature conservation policies and development management standards set out in the Draft Plan.

The Department **welcomes the inclusion of these amendments**, which will work towards the objectives of the National Biodiversity Action Plan and Article 10 of the Habitats Directive, to protect networks of biodiversity both inside and outside of designated sites.

B. Greenways and Walks

(1) PA-105, PA-106

The two proposed amendments introduce narrative and policy requiring the routing of greenways through areas where they do not pose threats to biodiversity.

The Department indicates that “Tourism, transport and recreational active infrastructure proposals can have a significant adverse impact on biodiversity through loss or fragmentation of habitat, lighting and disturbance to species within areas of high ecological interest”.

The submission welcomes the two proposed amendments and recommends that greenway/walkway proposals are subject to rigorous route/site selection processes, similar to a road proposal, to ensure that impacts to biodiversity and nature conservation interests are avoided.

CE response

It is noted that the OPR recommends omission of **PA-105**, the TII recommends consultation with the Council’s internal engineering staff, while the Heritage Council and An Taisce welcome and support this proposed amendment.

It is considered that PA-105 should be retained, with additional clarifications, which would represent only a minor modification of the proposed amendment. Such clarification would not affect the purpose or scope of the proposed addition to Section 27.7.4.

Please refer to the Final Chief Executive’s Recommendation relating to the OPR’s MA Recommendation 7, in Section 4 of this Report.

CE response

It is noted that the OPR recommends omission of **PA-105**, the TII recommends consultation with the Council’s internal engineering staff, while the DHLGH, the Heritage Council and An Taisce welcome and support this proposed amendment. It is considered that **PA-105** should be retained, with additional clarifications, which would represent only a minor modification of the proposed amendment.

This matter has already been addressed in response to Submission 80 (OPR). Refer to the Chief Executive’s Final Recommendation on Issue 7 (MA Recommendation 7) in Section 4 of this Report.

(2) PA-194

This proposed amendment inserts an objective for a looped walk around Carney (and on to Ballygilgan beach), bay extending the existing forest walk and providing a new footpath back to the village centre.

The Department has concerns that this proposal is directly adjacent to Ballygilgan Goosefield National Nature Reserve, one of Sligo’s three nature reserves. It is also part of Drumcliff Bay SPA, (Site code 004013) and Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC (000627). Recreational disturbance would negatively impact the Nature reserve, for Barnacle Geese, and importantly, the wild and relatively undisturbed part of the beach, which is an important high tide roost for birds (Qualifying Interests) which use the Drumcliff Bay SPA. This part of the forest also has a long-established communal nesting Heronry which is likely to be negatively impacted by disturbance from construction and walkers.

The Department notes that the previous provision of a footpath along the Oxfield Road to the east of the village to facilitate access to the same Carney forest loop walk resulted in the removal of 160 m of old traditional mixed hedgerow, which was neither translocated nor replaced. The addition of over-bright and needless streetlights, introduced artificial light to the previously dark rural area. The “enhancement” thus both urbanised a rural area, and reduced biodiversity.

The Department **recommends the removal of this amendment** for protection of protected species and European sites.

CE response

The concerns of the DHLGH are noted. The **objective D in Section 41.2.1 of Carney Village Plan** proposes a public footpath which would serve existing houses as well as forming part of a looped walk around the village of Carney. The objective also proposes the continuation of an existing forest walk through commercial forestry.

The presence of the local Heronry is noted, as is the adjacent Nature Reserve. The construction of this walkway should be timed so as to ensure that no negative impacts occur on either.

Street lighting is already installed along the L-3303-0.

It is considered that the PA-194 should be retained with added clarifications, which would represent a minor modification of the proposed amendment.

Chief Executive’s Final Recommendation

Apply a minor modification to **PA-194** (additional **Objective D** in Section **41.2.1**) as follows:

- D. Provide a looped walk around Carney village ~~(and on to Ballygilgan beach)~~ by extending the existing forest walk from the Cashelgarran Road eastwards to the L-3303-0 ~~at Ballygilgan~~ and by providing a new footpath along the L-3303-0 back to the village centre.

The existing hedgerow along the L-3303-0 should be retained. Where removal is unavoidable, the hedgerow shall be relocated and replaced.

Any works required by the extension of the forest walk and construction of the new footpath shall be timed and located so as not to disturb nesting Herons and grazing Barnacle Geese in the adjacent forest and Nature Reserve.

C. Development site boundaries

(2) PA-178

This proposed amendment removes the requirement to leave a grass verge between a road and a reconstructed (set back) site boundary.

The Department notes that many miles of species-rich roadside hedges are lost through a ‘thousand cuts’ for road widening and developments. However, there has been some success, in County Roscommon, at coppicing and then translocating the hedgerow to the new boundary, thus retaining much of its species richness, which recovers more quickly.

The Department recommends replacing the final sentence with “Translocation of an existing native roadside hedgerow will retain some of the biodiversity of the boundary”.

CE response

There is no objection to the suggested minor modification of the proposed amendment.

Chief Executive’s Final Recommendation

Modify **PA-178** (deletion of text from the final bullet point in **Section 33.4.4 Site boundaries**) as follows:

- Where a roadside boundary has to be set back to achieve sightlines, it should be reconstructed **or translocated** behind the required set back or replaced with a boundary which reflects the prevalent traditional field boundary in the area. This could take the form of a new hedgerow, a grassed bank or a dry-stone wall. ~~The area between the road and the new boundary shall be left as a grass verge.~~ **Translocation of an existing native roadside hedgerow is preferable, as it will retain some of the biodiversity of the original boundary.**

Proposed Amendments to Zoning

D. Nature conservation concerns

(1) PAZ-4

The Department has **concerns that this holding contains areas of natural habitats and ecological corridors**, including scrub woodland, wet grassland and a badger sett. Any change of zoning must ensure protection of biodiversity, ecological corridors and protected species.

(2) PAZ-5

The Department has **concerns that some of this area has mature trees, with associated ecosystems and protected species**, and furthermore appears to be a **ringfort with archaeological potential**.

(3) PAZ-9

The Department has **concerns that this holding contains areas of natural habitats and ecological corridors**, including hedgerows, scrub woodland, potentially species-rich grassland. Any change of zoning must ensure protection of biodiversity, ecological corridors and protected species.

(4) PAZ-13

The Department has **concerns that this holding contains areas of natural habitats and ecological corridors**, including hedgerows and in particular, species-rich wetland. This area coincides with the mapped wetland Caltragh Marsh (on the Irish Wetland Map), which appears to have suffered some infill in recent years. Any change of zoning must recognise, restore and protect these habitats, ecological corridors, protected species, and essential wetlands.

(5) PAZ-14, PAZ-15, PAZ-16

The Department has **concerns that these holdings are adjacent to Lough Gill SAC**, and contain ecological corridors, including hedgerows and watercourses that connect with the SAC. Any change of zoning must ensure protection of ecological corridors, protected species, and the European site.

(6) PAZ-58

The Department has **concerns that there are orchid rich grasslands** in this area. These lands are potentially orchid-rich calcareous grasslands and a botanical survey should be carried out before any rezoning is finalised.

CE response

PAZ-4, PAZ-5, PAZ-16, PAZ-58 - The CE notes the DHLGH's observations, but considers that any features that warrant protection (natural habitats, ecological corridors etc.) are more appropriately determined in the context of the preparation of a planning application. **Please also refer to the relevant PAZ subsections in Volume 3 of this Report for more detailed considerations and the CE Final Recommendation on each of these Proposed Amendments.**

PAZ-9, PAZ-13, PAZ-14, PAZ-15 - The above comments coincide with those made by the OPR (Submission 80) and the NWRA (Submission 78). **Refer to the Chief Executive's Final Recommendation regarding the OPR's MA Recommendation 1, in Section 4 of this Report, Issue 1 – Sligo Town: Regional Growth Centre.**

E. Archaeology concerns

(1) PAZ-5

The submission notes the presence of **Recorded Monuments SL014-225--- Ringfort** within the proposed rezoning of lands.

The Department recommends retention of the initial OS (open space) zoning, or rezoning as GB (Green Belt), instead of the proposed change to nRES (new residential uses) and inclusion in the strategic land reserve.

CE response

PAZ-5 - The CE notes the DHLGH's observations, but considers that archaeological features that warrant protection are more appropriately addressed in the context of the preparation of a planning application, through site investigations carried out by a qualified archaeologist.

Chief Executive's Final Recommendation

PAZ-5 – Make the Plan **WITH** the Proposed Amendment.

(2) PAZ-11

Proposed rezoning of lands in the vicinity of Recorded Monuments SL014-133 Ringfort could impact negatively on the amenity and setting of Recorded Monument SL014-231--- (cairn) and a companion cairn (SL014-232-) lying some 600 m to the east. Both monuments have been included in '*The Passage Tomb Landscape of County Sligo*' World Heritage Tentative List for UNESCO World Heritage Site.

These cairns, which form part of the ritual Neolithic landscape near Sligo town, stand on the summit of Carns Hill, which is one of the three geographic elements of the passage tomb complex. The others lie to the west, at Carrowmore with its extensive collection of passage tombs, and at Knocknarea Mountain where Maeve's Cairn and adjacent passage tombs are located. Intervisibility between the western cairn at Carns Hill (SL014-231) and the other elements of the passage tomb complex at Carrowmore and Knocknarea is an important feature of the setting of these monuments.

Were this rezoning to take place, it would represent **an objectionable visual intrusion and negative impact on the overall amenity and integrity of the great cairns at Carns Hill.**

It is considered that the proposed **rezoning will have a negative effect on the landscape character of Cairns Hill and on the amenity of the cairns upon it.**

CE response

PAZ-11 - The CE concurs with the above assessment. Residential development on these lands would have a substantial, negative impact on the integrity of the landscape and would undermine the Council's application for including this archaeology-rich area in '*The Passage Tomb Landscape of County Sligo*' World Heritage Tentative List for UNESCO World Heritage Site.

Chief Executive's Final Recommendation

PAZ-11 – Make the Plan **WITHOUT** the Proposed Amendment.

F. Observations not related to Proposed Amendments

(1) Monuments within zoned lands

The submission notes the presence of Monuments within lands that have been zoned for various types of development in Enniscrone, Sligo Town and Tobercurry (see list in the table on the next page).

The Department requests that current (i.e. draft) zoning be changed to GB (Green Belt) or OS (Open Space).

Location	Monument number	Department's rezoning request	Is the Monument located in a site subject to PAZ?
Enniscrone, Carrowhubbuck South Td.	SL016-01701- Ringfort & SL016- 01701 Souterrain	Change from strategic land reserve to open space and recreational amenities or green belt	No
Sligo, Bellanode Td.	SL014-283-- Enclosure	change from new residential uses to open space and recreational amenities or green belt	No
Sligo, Magheraboy Td.	SL014-270-- Souterrain	change from strategic land reserve to open space and recreational amenities or green belt.	No
Sligo, Farranacardy Td.	SL014-067-- Ringfort	change from strategic land reserve to open space and recreational amenities or green belt.	Zone of Notification overlapping with PAZ-9
Sligo, Ballyfree Td.	SL014-222-- Barrow Site	change Strategic land reserve long term strategic & sustainable development site (mixed use) to open space and recreational amenities or green belt	No
Sligo, Ballyfree Td.	SL014-223-- Barrow Possible Site	change from Strategic land reserve long term strategic & sustainable development site (mixed use) open space and recreational amenities or green belt	No
Sligo, Magheraboy Td.	SL014-124-- Enclosure Possible Site	change from transport and utilities and infrastructure to open space and recreational amenities or green belt	No
Tobercurry, Rathscanlan Td.	SL038-029-- Enclosure	change from business, industry and enterprise to open space and recreational amenities or green belt	No

CE response

While situated within areas zoned for development in Enniscrone, Sligo Town and Tobercurry, none of the Monuments listed above is located within lands subject to a Proposed Zoning Amendment.

In only one case, the Zone of Notification surrounding a Monument (SL014-067-- Ringfort at Farranacardy Td, Sligo Town) extends into lands subject to PAZ-09 (proposal to remove the lands from the SLR and zone them for residential uses).

At this stage in the Development Plan review process, having completed public consultation on Proposed Amendments, it is not possible to propose further rezoning of lands, because these would represent additional material alterations.

The protection of the Monuments listed in the Department's submission can be achieved as part of the development management process, without rezoning, through the rigorous application of Archaeological heritage policies set out in Chapter 25 of the Draft Plan and the development management standards specified in Section 33.6.3 of the Draft Plan.

No further modification to the Draft Plan is required on foot of the above request.

(2) Archaeological heritage policy P-AH-5

The Department requests the removal of "or by record" and its replacement with "Preservation in-situ must always be the preferred option".

CE response

Policy P-AH-5 reads as follows:

P-AH-5 Secure the preservation in situ or by record of:

- the archaeological monuments included in the Record of Monuments and Places as established under section 12 of the National Monuments (Amendment) Act, 1994;
- any sites and features of historical and archaeological interest;
- any subsurface archaeological features that may be discovered during the course of infrastructural/development works in the operational area of the Plan.

Preservation relates to archaeological sites or objects and their settings. Preservation in situ is most effectively achieved by the refurbishment of existing buildings, in situations where it is possible to retain the greater part of existing structures without the need for new foundations.

It is considered that the addition, at the end of the policy, of the sentence suggested by the Department would represent a clarification, not a material alteration. There is no objection to such addition.

The suggested deletion is considered unnecessary.

Chief Executive's Final Recommendation

In **Chapter 25 Built heritage**, clarify the policy **P-AH-5** by adding the following sentence to the last paragraph:

*Preservation relates to archaeological sites or objects and their settings. Preservation in situ is most effectively achieved by the refurbishment of existing buildings, in situations where it is possible to retain the greater part of existing structures without the need for new foundations. **Preservation in-situ should always be the preferred option.***

(3) Additional objectives

The Department requests the inclusion of the following objectives:

- *To protect and secure the preservation in-situ of town defences of all forms.*
- *To protect the preservation in-situ of significant medieval masonry remains found during the course of a development and (where practicable) the presentation of such remains should be as part of completed developments.*
- *To protect and secure the preservation in-situ of surviving above-ground urban medieval and 16th/17th century structures.*

CE response

At this stage in the Development Plan review process, having completed public consultation on Proposed Amendments, it is not possible to propose further objectives, because these would represent additional material alterations. However, the proposals should be considered as part of the next Plan review or variation, whichever occurs earlier.

No further modification to the Draft Plan is required on foot of the above request.

Section 7

Submission 1 – Environmental Protection Agency (EPA)

<https://consult.sligococo.ie/en/submission/slg-c44-1>

The EPA is one of the statutory environmental authorities under the SEA Regulations, with a central role in promoting the integration of the Environmental Assessment into the Development Plan. The Agency notes the determination regarding the need for SEA of the Proposed Amendments and indicates that guidance is available in the document entitled “*SEA of Local Authority Land Use Plan – EPA Recommendations and Resources*”.

The submission contains several recommendations of a general nature, not directly related to any of the Proposed Amendments:

- Sligo County Council should ensure that the Plan, as amended, is consistent with the need for proper planning and sustainable development. Adequate and appropriate critical service infrastructure should be in place, or required to be put in place, to service any development proposed and authorised during the lifetime of the Plan.
- In considering the Amendments, Sligo County Council should consider the need to align with national commitments on climate change mitigation and adaptation, as well as incorporating any relevant recommendations in sectoral, regional and local climate adaptation plans.
- Where further changes to the Draft Plan are proposed, these should be screened for likely significant effects in accordance with SEA Regulations. They should be subject to the same method of assessment applied in the "environmental assessment" of the Draft Plan.
- Once the Plan is adopted, an SEA Statement should be prepared, summarising the following:
 - How environmental considerations have been integrated into the Plan;
 - How the Environmental Report, submissions, observations and consultations have been taken into account during the preparation of the Plan;
 - The reasons for choosing the Plan adopted in the light of other reasonable alternatives dealt with;
 - The measures decided upon to monitor the significant environmental effects of implementation of the Plan.

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

CE Response

The EPA's recommendations are noted. The Council will comply with all the requirements of the Planning Act, Regulations and SEA Guidelines before and after the new Development Plan is adopted.

No further modifications are required to any Proposed Amendment.

(Section 7)

Submission 2– Health and Safety Authority (HSA)

<https://consult.sligococo.ie/en/submission/slg-c44-2>

The HSA indicates that it is an authority prescribed under the Planning & Development Regulations to be consulted in relation to Development Plans, and expects “the planning guidelines” to contain the following:

1. *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.*
2. *The consultation distances and generic advice, where applicable, supplied by the Authority to «PAR_PLANNING_AUTHORITY» 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.*
3. *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.*
4. *Mention of the following notified establishments:*
 - *Lough Gill distillery Ltd.*

The submission indicates that in previous correspondence – i.e. submission on the Draft Plan – the HSA brought to the Council’s attention “that Lough Gill Distillery Ltd is a Seveso establishment and that mention of this establishment would be expected to be found in the development plan”.

CE Response

In the Draft CDP, Section 28.1.4 Seveso sites (Chapter 28 Economic development, Volume 3 General Policies) contains a clear indication of the Council’s policy in relation to proposals for “Seveso” developments, which will be considered only in low-risk locations, within acceptable distances from relevant environmental sensitivities. It is stated that “such development proposals will be referred to the Health and Safety Authority, whose technical advice will be taken into account in the overall assessment of the proposals, in addition to normal planning criteria”.

It is noted that in January-March 2024, at the time of preparing the Chief Executive’s recommendations on submission received at pre-draft stage, the HSA website did not include the Lough Gill Distillery on the lists of Notified Seveso Establishments.

The most up-to-date list of Lower Tier Establishments, (retrieved from the HSA website in July 2024) mentions not one, but two such establishments in County Sligo:

- No. 38 - Lough Gill Distillery, Hazelwood, Co. Sligo
- No. 43 - Sazerac of Ireland ULC t/a Lough Gill Distillery, Hazelwood, Carns, Co. Sligo

Presumably it is the same establishment, erroneously listed twice.

Having regard to the recent publication of this list containing the Lough Gill Distillery, there is no objection to updating the text of the Draft Plan, which currently indicates that there is no “Seveso” development in Co. Sligo. This update would not be a material alteration or a further modification, it would be a **correction**.

Chief Executive’s Final Recommendation

In Section 28.1.4 Seveso sites (Chapter 28 Economic development, Volume 3 General Policies), **correct** the information contained in the second paragraph as follows:

This Development Plan does not designate sites or zones for uses that might be classified as Seveso establishments ~~and no such establishments exist at present~~. However, such developments may occur during the Plan's life. In 2024, the Health and Safety Authority (HAS) published an updated list of Notified Lower Tier Establishments, which mentions Lough Gill Distillery (Hazelwood, Co. Sligo).

(Section 7)

Submission 35 – Department of Education

<https://consult.sligococo.ie/en/submission/slg-c44-35>

The Department of Education acknowledges the importance of the ongoing work of the Council in ensuring sufficient and appropriate land is zoned for educational needs.

The submission contains several observations on certain Proposed Amendments, which are summarised below.

Issue 1 – Sligo Town population increase

A. The submission notes the proposed amendments to the Table 3.2 Core Strategy, **PA-4 and PA-5**, which would provide a “sizeable increase” in the population of Sligo Town and the County. In particular, PA-5 “sees a population increase in Sligo Town from the draft CDP population target of 23,800 to 25,360 persons by 2030”.

Such potential increase in population would require the reservation of a “suitable zoned site for a potential future new primary school” in Sligo Town.

The Department **welcomes PA-99 and PA-101**, which make provision for a new primary school to the south-west of Sligo Town’s built-up area, following a suggestion from the Department.

B. The submission includes a new request, to ensure “that the proposed site area is sufficient in size, appropriately zoned and centrally located within the community which it would be designed to serve”.

CE Response

A. The positive comments relating the PA-4, PA-5, PA-99 and PA-101 are noted.

B. Section **10.4.3 Masterplanning urban extensions** (Chapter 10 In Volume 2 of the Draft Plan) already specifies that towns – such as Sligo Town – should expand on the basis of masterplans for defined larger areas. The aim of these masterplans should be to design town “quarters” or neighbourhoods addressing, inter alia, the provision of physical and social infrastructure such as new schools.

It is considered that the reservation of a specific site or area, suitable for locating a potential new primary school, would be better determined through public consultation on the forthcoming Sligo and Environs Local Area Plan.

No changes / further modifications are required to any Proposed Amendment.

Issue 2 – welcome Proposed Amendments

The Department notes and welcomes **PA-100** (supporting schools in upgrading, modernizing and expanding) and **PA-64** (investigating the feasibility of a walking/cycling route to the Primary School in Strandhill).

CE Response

The positive comments on PA-100 and PA-64 are noted.

No changes are required to any Proposed Amendment.

(Section 7)

Submission 39 – Transport Infrastructure Ireland

<https://consult.sligococo.ie/en/submission/slg-c44-39>

Transport Infrastructure Ireland (TII) “welcomes the Proposed Material Alterations arising from the consideration of the Authority’s initial submission on the Draft Plan”.

The submission contains observations on certain Proposed Amendments, which are summarised below under the same thematic headings as used in the submission.

Issue 1 – Maintaining the Strategic Function, Capacity and Safety of the National Road Network

- A. The submission welcomes **PA-33** (additional strategic transport policy in relation to maintaining the strategic function, capacity and safety of the national road network), **PA-107**, **PA-108** and **PA-114** (related to Economic and Tourism Development with the potential to impact the national road network).
- B. TII is concerned that **PA-180** (relating to cases where direct vehicular access onto national primary roads cannot be avoided) conflicts with other provisions of the Draft Plan and with official policy included in Section 2.5 of the Section 28 Ministerial Guidelines ‘Spatial Planning and National Roads Guidelines for Planning Authorities’ (DoECLG, 2012). The submission recommends that “PA-180 as proposed is not adopted”.
- C. The submission notes that **PA-110** seeks to re-use worked-out quarries and requests the incorporation of a clarification regarding potential impact on national roads, similar to PA-107 and PA-108.

CE Response

A. The positive comments are noted.

B. Section 2.5 of the Spatial Planning and National Roads Guidelines refers to “additional access points from new development or the generation of increased traffic from existing accesses to national roads to which speed limits greater than 60 km/h apply”.

The proposed amendment **PA-180 does not relate to additional access points** from new development. There are situations where a new direct access onto a national road is unavoidable. For example, an established development (e.g. old residential property/farmhouse) with an existing access onto a national road will require a new access if the national road is realigned and there is no side road available for alternative access. Such new access is not an additional access, and is clearly unavoidable.

PA-180 indicates that in such cases, the requirements of TII’s updated standards will apply. The text proposed to be inserted in Section 33.9.1 – which was included following advice received from TII’s Sligo Regional Design Office – is extracted from TII’s publication DN-GEO-03060, which specifies, in Section 5.5. Direct Accesses, that “*Where direct vehicular access onto national primary roads cannot be avoided, a Departure from Standards with justification shall be required where a direct access is proposed. In all cases, the number of accesses on to the national road should be minimised, either by consolidating them into a single access point, or connecting them to existing side roads.*”

It is considered that PA-180 would benefit from clarifications rather than omission.

C. The suggestion regarding clarifications to **PA-110** is noted and agreed.

Chief Executive's Final Recommendations

A. No changes are required to PA-33, PA-107, PA-108 and PA-114.

B. **PA-180** – In **Section 33.9.1 Access onto national roads**, make an additional minor modification to the **first paragraph** under the heading **Sight distances for access onto national roads** as follows:

Where direct vehicular access onto national primary roads cannot be avoided (such as situations arising from national road realignment schemes), a Departure from TII Publications Standards DN-GEO-03060 with justification shall be required, as provided for in Section 5.5. Direct Accesses of DN-GEO-03060. In all cases, the number of accesses on to the national road should be minimised, either by consolidating them into a single access point, or connecting them to existing side roads.

The sight distances required for access onto national primary and secondary roads are set out in Table 33.8. The sight distances are measured from the access point to the near-side edge of the carriageway in accordance with the ~~Design Manual for Roads and Bridges~~ TII Publications Standards DN-GEO-03031 and DN-GEO-03060.

C. **PA-110** – In **Section 28.2.4 Mineral Extraction and quarries**, make a minor modification to the proposed amendment of **policy P-MEQ-2** as follows:

P-MEQ-2 Seek the reuse of worked-out quarries for recreational, industrial, ecological, **agricultural** and other uses, following appropriate restoration.

Proposals for reuse shall demonstrate that they do not conflict with the requirement to safeguard the strategic function, safety and investment in the strategic national road network to date, and is in compliance with the provisions of the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012).

Issue 2 – National Road Scheme Planning

The submission notes that "text associated with Proposed Amendment ref. no. **PA-51** indicates that TII has 'approved' the construction of a bypass for Tobercurry. 'Approval' for a Scheme is a matter for An Bord Pleanála, the Council may consider reviewing the text proposed in the interests of clarification.

TII welcomes PA-59, which introduces new text safeguarding the N17 Knock to Collooney Scheme.

CE Response

The positive comments on **PA-59** are noted.

In relation to **PA-51**, the proposal is to **remove** the sentence "**Transport Infrastructure Ireland (TII) has approved the construction of a bypass for Tobercurry**", not to add it.

No changes are required to PA-51 and PA-59, which should be incorporated into the final Plan without further modifications.

Issue 3 – Masterplanning

The submission notes **PA-39**, which seeks to ensure that large areas of greenfield zoned lands are developed on the basis of masterplans.

TII notes that *“the mechanism and governance associated with the preparation of masterplans has not been outlined. TII is of the opinion that where masterplans are proposed to be used to inform development management decisions, particularly in relation to areas with the potential to impact the strategic national road network, planning authorities should incorporate them in the development plan or local area plan and where possible, public consultation should be integrated into their preparation”*.

It is requested *“that the approach to and governance of Masterplanning is addressed prior to finalisation of the Plan to address the deficiencies in consultation, liaison and evidence base requirements required by official policy provisions”*.

CE Response

It is agreed to clarify that the envisaged masterplans would be subject to public consultation and, where considered appropriate based on the extent of land involved, incorporated into the relevant statutory plan (development plan or local area plan). Such clarification would represent a minor modification of the Proposed Amendment.

Chief Executive’s Final Recommendation

PA-39 – In **Section 10.4 Compact growth**, insert a minor modification to the proposed text amending the additional Compact growth policy **P-CG-6**, as follows:

P-CG-6 Ensure that large areas of greenfield zoned land in towns and villages are developed on the basis of masterplans, to be prepared by or in consultation with the Planning Authority, in order to ensure appropriate integration of land-use and transport.

Such masterplans shall be subject to public consultation and, where considered appropriate based on the extent of land involved, incorporated into the relevant statutory plan (development plan or local area plan).

Issue 4 – TII Publications / Design Reports

A. The submission notes that **PA-42** “references the preparation of public realm strategies/schemes for a number of towns and villages, some of which are located along the strategic national road network” and requests the introduction of a requirement “that a Design Report is completed and submitted for works to national roads in accordance with TII Publications DN-GEO-03030 (Design Phase Procedure for Road Safety Improvement Schemes, Urban Renewal Schemes and Local Improvement Schemes).”

B. The same requirement as above should be included for any works relating to active travel facilities proposed by **PA-54** in Ballysadare (N-59), **PA-63** in Grange (N-15), **PA-199** in Cliffony (N-15), **PA-202** in Curry (N-17), **PA-203** in Drumcliffe (N-15).

C. The same requirement as above should accompany the proposals for active travel along national roads under **PA-136**.

CE Response

A, B, C. There is no objection to adding a clarification/minor modification to each of the proposed amendments listed above, to ensure conformance with official policy provisions included in RPO 6.5/NPO 74 and NSO 2, as indicated by the TII.

It should be noted that **the correct reference for Curry is PA-201, not PA-202.**

Chief Executive's Final Recommendation

Add the following clarification/minor modification to each of the following proposed amendments: **PA-42, PA-54, PA-63, PA-136, PA-199, PA-201, PA-203:**

Where such schemes specify works to intra-urban portions of national roads, a *Design Report* shall be completed and submitted in accordance with TII Publications DN GEO-03030 (Design Phase Procedure for Road Safety Improvement Schemes, Urban Renewal Schemes and Local Improvement Schemes)".

Issue 5 – Renewable Energy and Grid Connections

The submission notes **PA-187**, which introduces new text related to grid connection development, and recommends *"that the Council has regard to the provisions of CAP24 when considering the Proposed Amendment"*.

It indicates that the Climate Action Plan 2024 specifies that *"All relevant public bodies will carry out their functions in a manner which supports the achievement of the renewable electricity targets, including, but not limited to, the use of road and rail infrastructure to provide a route for grid infrastructure where this is the optimal solution"*.

CE Response

It is not clear what is requested above, as the source of PA-187 was TII's submission on the Draft Plan.

No further modification is necessary to PA-187.

Issue 6 – Greenways and Active Travel

The submission notes **PA-105**, which indicates that *"greenways should not be routed through areas of high nature value, because they can pose threats to biodiversity ... "*

TII recommends consultation with the Council's own internal project and/or design staff prior to finalising the Development Plan, to ensure that the text alterations do not undermine or compromise any scheme development.

CE response

It is noted that the OPR recommends omission of **PA-105**, while the DHLGH fully supports this proposed amendment. It is considered that **PA-105** should be retained, with additional clarifications, which would represent only a minor modification of the proposed amendment.

This matter has already been addressed in response to Submission 80 (OPR). Refer to the Chief Executive's Final Recommendation on Issue 7 (MA Recommendation 7) in Section 4 of this Report.

Issue 7 – Village Plans

The submission notes that certain PAZ relate to lands “where TII’s records indicate that an 80 km/h speed limit applies”, while a further PAZ relates to lands located “within the Constraints Study Area of the N-17 Knock to Collooney Scheme:

- A. Ballysadare – **PAZ-41, PAZ-44 and PAZ-46** outside the 60 km/h speed limit;
- B. Cliffony – **PAZ-69 and PAZ-70** outside the 60 km/h speed limit;
- C. Curry – **PAZ-76** within the Constraints Study Area of the N-17 Knock to Collooney Scheme.

TII recommends a review of the above zoning proposals and confirmation that access to the subject lands, which adjoin or extend along national roads outside the 50-60 km/h speed limit, will be omitted from the final Plan.

In addition, zoning designation within the Constraints Study Area of the N-17 Knock to Collooney Scheme should be reviewed to ensure that proposals do not impact on the delivery of the Scheme.

CE response

A. In Ballysadare, the eastern section of the lands subject to **PAZ-46** (zoned nRES) are largely within the 50km/h urban speed limit. The western portion (zoned BIE) are partly within the 60km/h speed limit. Each of the two sections can be served by a vehicular access located in accordance with the Spatial Planning and National Roads Guidelines for Planning Authorities’ (DoECLG, 2012). As set out in Volume 3 of this report, the CE does not support the inclusion of these lands within the SLR as proposed by this amendment.

The lands subject of **PAZ-41** and **PAZ-44** are located in an area where a speed limit greater than 60 km/hr applies. Furthermore, these lands are neither fully serviced (Tier 1) nor serviceable during the six-year period of the CDP 2024-2030 (Tier 2). The CE does not support **PAZ-41** and **PAZ-44** for the reasons set out in Volume 3 of this Report.

B. In Cliffony, the lands the subject to **PAZ-69** adjoin the N-15 within the 60 km/h speed limit. The speed limit sign is just at the north-eastern boundary of the lands.

The lands have the benefit of planning permission (PL21/135), which includes the provision of a new vehicular access onto the N15. The permitted access is located within the 50-60 km/h speed limit. Development on the site subject to **PAZ-70**, adjoining that of PAZ-69, can share the permitted access.

C. It is noted that the N-17 Knock to Collooney Project has progressed from the Constraints Study stage to the selection of a Preferred Corridor (now completed), which runs to the east of Curry, without interfering with the site of PAZ-76. Notwithstanding this, the CE does not support **PAZ-76** for the reasons set out in Volume 3 of this Report.

Chief Executive’s Final Recommendations

- A. The Plan should be made **without** the proposed amendments: **PAZ-41, PAZ-44 and PAZ-46**.
- B. The Plan should be made **with** the proposed amendments: **PAZ-69 and PAZ-70**.
- C. The Plan should be made **without** the proposed amendment **PAZ-76**.

Please refer to the relevant PAZ subsections in Volume 3 of this Report for more detailed considerations on each of these Proposed Amendments.

(Section 7)

Submission 43 – Department of Transport

<https://consult.sligococo.ie/en/submission/slg-c44-43>

The Department's submission contains several observations, some of them not related to any of the published Proposed Amendments. The submission refers to a "proposed plan", but also to the proposed amendments PA-199 and PA-203.

Issue 1 – "important policy developments"

The Department of Transport considers that some "*important policy developments which are relevant to accessible, integrated and sustainable public transport*", should be "*reflected in the proposed plan*". The following are listed:

- the "whole of Government" National Disability Inclusion Strategy (NDIS) 2017-2022, with specific actions assigned to local authorities, such as action 108 relating to the 'dishing' of footpaths and action 109 relating to accessible infrastructure, including bus stops;
- the United Nations Convention on the Rights of Persons with Disabilities (UNCPRD) ratified by Ireland in 2018, which puts obligations on State Parties to ensure access for persons with disabilities to the physical environment and transportation in both urban and rural areas;
- the Design Manual for Urban Roads and Streets (DMURS) Interim Advice Note – Covid-19 Pandemic Response published in 2020, which includes guidance to ensure that measures align with the principles of universal design.

CE Response

The information provided by the Department is noted. However, the Draft CDP 2024-2030 has progressed from the Draft Plan stage to the Proposed Amendments stage, and public consultation on such amendments has been already completed. It is considered that the Draft Plan already contains sufficient provisions requiring the application of universal design principles.

At the current stage in the Development Plan review, no new material alterations can be proposed.

Issue 2 – DMURS 2020 Interim Advice Note

The submission requests that "*References in the draft Plan to the 2019 version of DMURS should be replaced with references to the 2020 DMURS Interim Advice Note – Covid-19 Pandemic Response*".

CE Response

The Department has not provided any justification for the request to **replace** the references to the DMURS with references to one of the six Advice Notes issued after the publication of the revised DMURS in 2019. Such replacement is unwarranted. **No change to any Proposed Amendment is necessary.**

Issue 3 – universal design standards in public transport

The submission reiterates that “to make public transport fully accessible to people with disabilities requires a ‘whole journey approach’. This refers to all elements that constitute a journey from the starting point to destination. Local Authorities are a key stakeholder by ensuring a universal design approach to the built environment’. This including footpaths, tactile paving, cycle paths, roads, pedestrian crossing points, town greenways and bus stops/shelters”.

The Department recommends that ‘universal design’ standards be included “for all new footpaths/pedestrian links such as **PA-199** (in Section 43.2.1 Transport and Circulation, page 28) and **PA-203** (Section 48.2.3.C, Chapter 48 – Drumcliffe Village Plan, page 42).

CE Response

Section 29.6 Public transport (p. 101 in Volume 3 General Policies of the Draft Plan) indicates the following:

The Local Authority has a key role in the ‘whole journey approach’ to making public transport fully accessible to people with disabilities. This is achieved by implementing a universal design approach to the built environment, including footpaths, cycle paths, roads, pedestrian crossing points, town greenways and bus stops/shelters.

Provision for universal design is also made in the Draft Plan chapters/sections dedicated to residential development, community facilities, outdoor recreation, development management standards.

Further insertions of the requirement for “universal design standards” in any of the Proposed Amendments are not necessary.

Issue 4 – rural public transport

The Department states that “the Connecting Ireland Rural Mobility Plan (2022-2025) is a major national public transport initiative with the aim of increasing public transport connectivity, particularly for people living outside the major cities and towns” and offers to “assist with appropriate text in the development plan regarding integrated, accessible public transport”.

CE Response

The offer of assistance is noted, but it does not relate to any of the Proposed Amendments.

At the current stage in the Development Plan review, no new material alterations can be proposed.

(Section 7)

Submission 51 – Department of Environment, Climate and Communications

<https://consult.sligococo.ie/en/submission/slg-c44-51>

The Department's submission outlines the status of the CAP23 (updated as CAP24), welcomes the Sligo Climate Action Plan 2024-2029 and the Draft Plan's consistency with it, and makes several observations on Proposed Amendments.

Issue 1 – Sligo Climate Action Plan 2024-2030

The submission **welcomes** the proposed amendment **PA-1**, which indicates that the Local Authority has taken into account the LA CAP during the preparation of the Draft Plan.

CE Response

The positive comments are noted.

Issue 2 – waste

The Department advises the Local Authority *"to consult with their respective [Regional Waste Management Planning Office](#) regarding the finalisation of the development plan, particularly in relation to any policies which may preclude the continued use of existing waste management infrastructure or development of new waste management infrastructure"*.

CE Response

The above advice does not relate to any Proposed Amendment.

The hyperlink provided in the submission leads to the Regional Waste Management Plans web page on gov.ie, with no further links to a "Regional Waste Management Planning Office"

No modifications to the Proposed amendments are necessary on foot of this advice.

Issue 3 – renewable electricity

The submission **welcomes** the Proposed Amendments **PA-150, PA-151, PA-152, PA-156** relating to the production and storage of renewable energy.

It also **welcomes** **PA-157** (commitment to prepare a renewable energy strategy for the County), **PA-160** and **PA-161** (inclusion of CAP24 interim targets for renewable electricity).

In relation to **PA-185**, the Department notes that *"the Draft Wind Energy Development Guidelines (2019) are not finalised and, as such, the 2006 guidelines remain in place until the ongoing revision of the existing Guidelines are completed."*

It is requested to “remove reference to the 2019 draft Guidelines” from the Proposed Amendment PA-185.

CE Response

The positive comments on **PA-150, PA-151, PA-152, PA-156, PA-157, PA-160 and PA-161** are noted.

In relation to **PA-185**, the proposed amendment is to include the reference to the DECLH 2006 Wind Energy Guidelines, while at the same time retaining the initial reference (in the Draft Plan) to the DHLGH’s 2019 Draft Wind Energy Guidelines.

The 2019 draft document, although not finalised, contains a substantial amount of technical information on wind energy developments and landscape character assessment, which represents a useful update compared to the 2006 Guidelines.

It is also noted that the “Draft Revised Wind Energy Development Guidelines (2019)” remains available to the public on the Government’s official website at [gov - Draft Revised Wind Energy Development Guidelines December 2019 \(www.gov.ie\)](http://www.gov.ie/gov - Draft Revised Wind Energy Development Guidelines December 2019)

The removal of the reference to the 2019 Draft Wind Energy Guidelines is unwarranted.

The proposed amendment PA-185 should be made without further modifications.

(Section 7)

Submission 52 – Land Development Agency

<https://consult.sligococo.ie/en/submission/slg-c44-52>

The LDA acknowledges that the Proposed Amendments have incorporated several recommendations from its previous submission. However, there are some areas which require *“further consideration to ensure the Development Plan fully supports the LDA in the objective of providing affordable housing within the county”*.

The submission does not indicate the numbers/codes of the Proposed Amendments to which it refers, but these have been identified based on descriptions provided.

Issue 1 – residential density

The submission considers that the *“Draft Plan has the potential to be restrictive by only allowing for the highest density range (50-150 units/ha) on TC1 and TC2 zoned lands”*. It is suggested that the same density range should apply to *“immediately surrounding neighbourhoods, and strategic and sustainable development locations within the existing built-up footprint of the town”*.

The submission also indicates that the provision to apply the lower-density range in all other areas, unless site-specific reductions are necessary, *“could affect ... the adoption of increased densities at suitable sites”*.

CE Response

PA-88 proposes substantial changes to Section 26.1.2 Residential density (Chapter 26 – Residential development), including those described above.

The LDA may have not noticed the following paragraph included in PA-88, where it is stated that:

The density ranges set out in Section 3.3 of the SRDCS Guidelines should be refined, based on consideration of centrality, and accessibility to services and public transport, settlement character, amenity and the natural environment. Section 3.3.6 of the Guidelines lists exceptional situations where very high densities (over 300 units/ha) would be open to consideration, or where lower densities would be acceptable (on very small infill sites, to protect the amenities of surrounding properties).

In accordance with the provisions of the *Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities (2024)*, the Planning Authority will determine the appropriate residential density for each development proposal by considering, inter alia, the type of area (e.g. centre, urban neighbourhood), its location, character and availability of services.

The forthcoming Local Area Plan for Sligo and Environs will contain refined provisions on the applicability of residential densities in different types of areas of Sligo Town.

No further modification is required to PA-88, which should be incorporated into the final Plan as proposed.

Issue 2 – minimum garden size

The submission indicates that “*In updating Table 33.3 ‘Minimum net garden sizes for houses’, to reflect SPPR 2 of the Sustainable and Compact Settlements Guidelines, reference to house type ‘3 bedrooms or fewer’ requiring 40 m² garden size conflicts with the specific minimum requirement for 1- and 2-bedroom houses*”.

CE Response

PA-173 contains proposed modifications to **Table 33.3 Minimum net garden sizes for houses**. It is acknowledged that an error has occurred in updating the table. This error should be corrected.

Chief Executive’s Final Recommendation

PA-173 – In **Section 33.3.8 Private open space**, correct the third row in the **Table 33.3** by **deleting** the words “or fewer”:

revised **Table 33.3 Minimum net garden sizes for houses**

House type	Minimum size
1 bedroom	20 m ²
2 bedrooms	30 m ²
3 bedrooms or fewer	60 m² 40 m ²
4 or more bedrooms	75 m² 50 m ²

Issue 3 – unit mix

The LDA welcomes **PA-91**, which proposed changes to the Urban Housing policy P-UHOU-2, to ensure compliance with the *Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities* (2024).

The submission reiterates the LDA’s previous request for amendments to P-UHOU-4, to “*facilitate a deviation from the specified unit mix, on a case-by-case basis, where it can be demonstrated that the development is for the provision of social/ affordable housing and to respond to the specific demands of an area or unique site constraints*”.

CE Response

P-UHOU-4 requires urban developments to have a minimum of 30% one-bedroom and two-bedroom units, responding to changing demographic trends (e.g. over 25% of households in County Sligo were one-person households at the last Census). The wording of policy P-UHOU-4 indicates that the specified mix of unit types should “generally apply”.

As already stated by the CE in response to the LDA’s previous submission, the wording of the policy is not restrictive and allows for a degree of flexibility where necessary.

No further modification to any Proposed Amendment is required.

(Section 7)

Submission 53 – Heritage Council

<https://consult.sligococo.ie/en/submission/slg-c44-53>

The Heritage Council welcomes the opportunity to comment on the Proposed Amendments to the Draft Sligo CDP 2024-2030. After an introduction listing a range of national policy documents, the submission refers to thirteen (13) Proposed Amendments.

The Heritage Council welcomes, commends or supports the following Proposed Amendments without recommending further modifications: **PA-84, PA-86, PA-182, PA-188, PA-189, PA-190.**

The Heritage Councils' comments on the other seven Proposed Amendments are summarized below.

Issue 1 – residential density

PA-8 introduces changes to **Section 3.2.6 Residential density** in Volume 1 (Core Strategy) of the Draft Plan.

The submission expresses concerns regarding “*the density range for small to medium- sized towns, and for the outer edges of Sligo town*”, considering them too low. It is stated that “*Often the historic linear Irish townscape of terraced houses has a relatively high density- high coverage efficient use of land typology that accommodates family homes, and more modern developments can replicate this built form*” ... “*more modern terraces in towns in Sligo have also achieved relatively high density that responded positively to this historic context*” ... “*there is concern that having a maximum 40 dwellings per hectare in such settlements does not respond to the existing pattern of development*”.

The Heritage Council recommends that suitable departures (upwards) from the maximum density standards are reflected in policy, to avoid compromising compact growth and brownfield development by having a rigid target.

CE Response

The residential density ranges introduced in Section 3.2.6 by **PA-8** are extracted from the *Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities* (2024).

It should be noted that PA-8 is complemented by PA-88, which proposes corresponding changes to Section 26.1.2 Residential density (Chapter 26 – Residential development).

As indicated in the CE response to Submission 52 (LDA), PA-88 specifies that “*The density ranges set out in Section 3.3 of the SRDCS Guidelines should be refined, based on consideration of centrality, and accessibility to services and public transport, settlement character, amenity and the natural environment*”.

The Planning Authority will determine the appropriate residential density for each development proposal by considering, inter alia, the settlement category, the type of area (e.g. centre, urban neighbourhood), its location and historic character, where applicable.

No further modification is required to PA-8.

Issue 2 – housing land provisions

The Heritage Council welcomes the new **strategic housing policy SO-HOU-3** proposed under **PA-20** and suggests a minor modification to highlight the need for reusing historic buildings.

CE Response

The suggestion is agreed. The proposed policy SO-HOU-3 should be modified as requested in the Heritage Council's submission. This would be a minor modification.

Chief Executive's Final Recommendation

PA-20 – In **Section 6.5 Housing land provision**, insert a minor modification to the proposed **strategic housing policy SO-HOU-3** as follows:

SO-HOU-3 Prepare a programme for the acquisition of suitable sites, including inner core sites/vacant properties (both designated and non-designated), in small towns and villages under the **Ready to Build Scheme** and commence its implementation within one year of the adoption of the Development Plan.

Issue 3 – landscape character

The Heritage Council "*commends and strongly supports*" the additional landscape character protection objectives O-LCP-3 (preparation of a Landscape Character Assessment for the County) and O-LCP-4 (investigate the potential for new National Parks) introduced by **PA-69** and **PA-70**, respectively.

The submission suggests that the Council liaise with the NPWS "*to see if any plans for a national park can be progressed with the forthcoming national restoration plan in mind i.e. the potential for such a national park to identify scope for habitat improvements*".

CE Response

The positive comments are welcome. The suggestion to liaise with the NPWS regarding National Parks is outside the scope of the consultation on Proposed Amendments to the Draft CDP 2024-2030.

No further modification to any Proposed Amendment is required.

Issue 4 – biodiversity and nature conservation

The submission welcomes the additional biodiversity Policy P-BD-7 introduced by **PA-80**, but indicates that "*there is a need to insert retention of existing habitats, before discussing enhancement and Biodiversity Net Gain (BNG) considerations*".

CE Response

The observation is noted and agreed. A minor modification should be applied to **PA-80** to require retention of existing habitats and BNG.

Chief Executive's Final Recommendation

PA-80 – In **Section 24.1**, insert a minor modification to the first paragraph of the additional **Biodiversity policy P-BD-7**, as follows:

- P-BD-7** Require development proposals on sites of 0.5 ha and over to retain existing high-quality ecological features and demonstrate a **site-specific biodiversity net gain (BNG)**, indicating how the approach to development will leave the natural environment in a measurably better state than it was beforehand. The same approach will be encouraged, although not required, on sites under 0.5 ha.

Issue 5 – distance between dwellings

The submission recommends a minor modification to **PA-171**, which reduces the separation distance between rear opposing windows to 16 m (from 22 m) or lower, in certain circumstances.

CE Response

The observation is noted and agreed. A minor modification should be applied to **PA-171** to facilitate the reuse of historic structures and maximise the potential of brownfield sites.

Chief Executive's Final Recommendation

PA-171 - In **Section 33.3.5 Distance between dwellings**, modify the proposed additional paragraph as follows:

In general, there should be a separation of at least 16 metres between opposing windows serving habitable rooms at the rear or side of houses, duplex units and apartment units, above ground floor level. Separation distances below 16 metres may be considered acceptable in circumstances where there are no opposing windows serving habitable rooms and where suitable privacy measures have been designed into the scheme to prevent undue overlooking of habitable rooms and private amenity spaces. Lower separation distances may also be considered in order to bring new uses to protected structures and other non-designated historic assets and to maximise the potential of inner core brownfield sites.

Issue 6 – BNG in residential public open space

The submission recommends a minor modification to **PA-172** (which introduces new quantitative standards for public open space in multi-unit housing developments) to include mention of Biodiversity Net Gain.

CE Response

The observation is noted and agreed. A minor modification should be applied to **PA-172** to ensure that the new BNG requirement is included in open space calculations.

Chief Executive's Final Recommendation

PA-172 - In **Section 33.3.7 Public open space in multi-unit housing schemes**, insert a minor modification to the first bullet point under the heading "Quantitative standards" as follows:

Quantitative standards

A minimum of 10% and a maximum of 15% of the net site area shall be reserved for the provision of communal open space, landscaped to a high standard.

- The minimum requirement should be justified taking into account existing public open space provision in the area, broader nature conservation and environmental considerations, and Biodiversity Net Gain calculations/requirements.

(Section 7)

Submission 63 – Electricity Supply Board (ESB)

<https://consult.sligococo.ie/en/submission/slg-c44-63>

ESB acknowledges “the overall ambition of the Draft Plan to reinforce climate change policies” and welcomes “the further emphasis being delivered through the proposed amendments”.

In particular, the submission welcomes the following Proposed Amendments:

- **PA-69 and PA-157**, which set a timeframe for the preparation of a Landscape Character Assessment in support of a Renewable Energy Strategy for County Sligo;
- **PA-151 and PA-152** (solar energy development);
- **PA-150, PA-153 and PA-185**, relating to wind energy development;
- **PA-154** (policy on energy storage);
- **PA-155 and PA-158**, relating to hybrid renewables;
- **PA-184** (EV charging infrastructure).

Issue 1 – PA-159

Twice within the submission, the ESB argues for the inclusion of the narrative introduced by **PA-159** in **Section 31.3 (Renewable energy)** as a “*stand-alone promotional Objective for the development of Renewable Enabling Plant*”. This request is justified as follows:

Energy security and sustainability are the main concerns in combatting climate change. Notwithstanding the Government’s aim to increase the percentage of electricity generation from renewables to 80% by 2030, the contribution from non-renewable sources will still consist of 20%. Furthermore, on dull still days or nights, almost all electricity may sometimes need to come from non-renewables generation plant. This efficient plant can be applied rapidly to provide operational flexibility and the required grid support services, when needed. Typical Plant consists of fast-responding gas turbines (i.e. FlexGen Plant) to provide backup power.

CE Response

PA-159, originating from the initial ESB submission on the Draft Plan, introduces the following paragraph to **Section 31.3 Renewable energy**:

It must be recognised that gas, particularly renewable and indigenous gas, will continue to have a role to play in the transition to a low carbon economy. As such, renewable energy developments may require support from such sources in times of high energy demand.

Commenting on the same **PA-159**, An Taisce (Submission 83) recommends that “*any need for back- up in the short term should not equate to proposals for new gas-fired power generation being granted permission on this basis as this would cause further fossil gas lock-in*”.

While there is no indication in PA-159 that “new gas-fired power generation” would be “granted permission on this basis”, it is also not possible to promote the statement to the status of **Plan objective**. This would be a material alteration, which cannot be proposed at this stage in the Plan review process.

It is envisaged that the forthcoming **Renewable Energy Strategy** will provide the basis for updating the Development Plan policies, objectives and standards relating to renewable energy developments.

No further modification to PA-159 is required.

(Section 7)

Submission 69 – Uisce Éireann

<https://consult.sligococo.ie/en/submission/slg-c44-69>

Uisce Éireann welcomes the inclusion of proposed amendments arising from its initial submission on the Draft Plan, specifically the following: **PA-10, PA-13, PA-54, PA-71, PA-97, PA-138, PA-139, PA-140, PA-141, PA-142, PA-143, PA-144, PA-145, PA-146, PA-147, PA-148, PA-149, PA-162, PA-166, PA-193, PA-196 and PA-205.**

Noting that proposed changes in population targets and housing allocations in the Core Strategy, the submission indicates that there is adequate spare capacity available to cater for the envisaged population growth.

At the same time, UE questions the need for “disproportionate” rezoning in rural settlements and states that any significant increase in the amounts of land zoned for residential (nRES) and employment (BIE) uses would require strategic network and treatment plant upgrades.

The submission provides valuable details regarding water infrastructure deficiencies in settlements where additional lands are proposed to be zoned. It also indicates the types of interventions that would be required in order to service such lands. These are presented below, grouped by issue and settlement.

CE Response

The substantial amount of useful information provided by UE is welcome. The Chief Executive concurs with the concerns expressed by UE in relation to the significant increase in the amount of zoned land arising from the proposed amendments.

The specific deficiencies and interventions required to service each of the PAZ sites mentioned in the submission (as detailed below) have been taken into consideration when formulating the Chief Executive’s Final Recommendations on each relevant Proposed Amendment to Zoning.

Please refer to Volume 3 of this Report.

Issue 1 – PAZ requiring network reinforcements

A. Certain lands proposed to be zoned would require network extensions longer than 150 m. The corresponding proposed amendments to zoning are:

PAZ-11, PAZ-24, PAZ-26, PAZ-35, PAZ-41, PAZ-44, PAZ-45, PAZ-46, PAZ 56, PAZ-60, PAZ-63, PAZ-64, PAZ-76,

B. Localised network upgrades would be required in areas served by 150-mm diameter sewers or watermains with a diameter of 80 mm or smaller. The envisaged proposed amendments are:

PAZ-17, PAZ-23, PAZ-36, PAZ-39, PAZ-57, PAZ-58

C. Third-party agreements for servicing new development via private property or private water services infrastructure would be needed for:

PAZ-9, PAZ-39, PAZ-54, PAZ-68, PAZ-70, PAZ-80 and PAZ-86

D. In addition, the **connection at Curry** could require a river crossing into the pumping station and an upgrade of the station would likely be required to cater for full development of the site.

CE Response

Please refer to Volume 3 of this Report.

Issue 2 – PAZ in the vicinity of UÉ assets

The submission indicates that *“Cognisance should be had to the proximity of residential zonings to Wastewater Treatment Plants (WWTP) and to the established use of the existing treatment plant and the potential for extensions/ intensification of use of the treatment plant in the future”*.

Any development in the vicinity of UE assets must be in accordance with UE’s standard details and codes of practice. This applies to the sites subject of the following proposed amendments:

PAZ-3, PAZ-4, PAZ-10, PAZ-36, PAZ-51, PAZ-68, and PAZ-77.

CE Response

Please refer to Volume 3 of this Report.

Issue 3 – PAZ in Ballysadare

The submission notes that:

- A. Sites **PAZ-41 and PAZ-44** are located at a substantial distance – more than 700 m – from the likely sewer connection point; longer extensions (to avoid third-party lands) and upsizing of water and wastewater pipes may be required; third-party permissions may be required;
- B. Site **PAZ-45** may need a long extension, upgrades and/or third-party permissions.

CE Response

Please refer to Volume 3 of this Report.

Issue 4 – PAZ in Ballymote

Without specifying any PAZ, the submission indicates that the pipe size is unknown across much of the sewer network in Ballymote, and that known portions of older watermains include cast-iron pipework. Both networks may require upgrades to facilitate new development.

CE Response

Please refer to Volume 3 of this Report.

Issue 5 – PAZ in Easky

The submission notes that:

- A. Site **PAZ-60** is located at circa 200 m from the nearest sewer; potential may exist to connect to the private network in Woodland Crescent, subject to third-party agreement.
- B. For site **PAZ-62**, the nearest wastewater connection is at 500 m to the north (Easky WWTP).

CE Response

Please refer to Volume 3 of this Report.

Issue 6 – PAZ in Enniscrone

The submission indicates the following:

- **PAZ-31** – nearest wastewater connection would be direct into the Linx Estate WWPS, 370 m north of the site.
- **PAZ-32** – water supply 280 m west of the site, sewer 640 m west of the site.
- **PAZ-33** – water supply 160 m east of the site, sewer 850 m west of the site.
- **PAZ-34** – the nearest wastewater connection would be direct into the Linx Estate WWPS, 730 m north of the site.

CE Response

Please refer to Volume 3 of this Report.

Issue 7 – PAZ in Monasteraden

The submission indicates the site subject to **PAZ-81** is served by a 25-mm water supply pipe, which would require upsizing.

CE Response

Please refer to Volume 3 of this Report.

Issue 8 – PAZ in Sligo Town

The submission indicates the following:

- **PAZ-14 and PAZ-15** are removed from the town and would require network extensions and upgrades, pumping station and rising main infrastructure. Such works would have to be undertaken by developers.
- **PAZ-9** is adjacent to the reservoir, therefore on-site boosting may be needed. The nearest sewer and water networks are over 900 m and 250 m away, respectively.
- **PAZ-10** is not served by the public wastewater network.

- **PAZ-13** – the nearest sewer and watermain are available at the edge of the adjacent roundabout. A trunk watermain was also installed along the Western Distributor Road.

CE Response

Please refer to Volume 3 of this Report.

Issue 9 – PAZ in Strandhill

The submission indicates the following:

- A. **PAZ-52 and PAZ-53** are not serviced for wastewater collection
- B. **PAZ-57** would require upsizing of the 150-mm sewer over a length of more than 200 m.

CE Response

Please refer to Volume 3 of this Report.

Issue 10 – Additional land zoning in rural settlements

The submission indicates that UE is unable to provide feedback regarding lands proposed to be zoned in several (unnamed) rural settlements with no (or inadequate) wastewater treatment capacity.

CE Response

Noted. **No further modifications are required to any Proposed Amendments on foot of the above comments.**

Issue 11 – Additional wastewater treatment policy (PA-148)

The submission indicates that “Wastewater pumping infrastructure associated with the vast majority of new residential developments are taken in charge upon completion subject to meeting the necessary criteria and conditions in the developers’ connection agreement with UÉ”.

CE Response

Noted. **No further modifications are required to PA-148 on foot of the above comments.**

(Section 7)

Submission 70 – National Transport Authority (NTA)

<https://consult.sligococo.ie/en/submission/slg-c44-70>

The National Transport Authority welcomes the Proposed Amendment **PA-39** (development of greenfield zoned lands on the basis of masterplans), **PA-41** (reference to filtered permeability), **PA-131 and PA-132** (amendments to cycling and walking policies), all arising from the NTA's initial submission on the Draft Plan.

Issue 1 – PA-105 and PA-106

The submission expresses concerns regarding the perceived conflict between the narrative introduced by PA-105 to Section 27.7.4 (Outdoor recreational amenities) and the additional policy P-OR-23 inserted in the same section (note – this is a reference to PA-106). It is stated that:

“PA-105 includes wording that ‘greenways should not be routed through areas of high nature value’ (Section 27.7.4). However, PA-106 (proposed policy P-OR-23) states: ‘Ensure that the routing/location, siting and design of proposed outdoor recreational infrastructure (greenways, walking and cycling paths/trails, parks and other open spaces) does not have a significant adverse impact on biodiversity.’”

While policy P-OR-23 appears to ensure that projects are evaluated on their individual merits, the previous statement implies that no greenways or blueways should be considered in ‘areas of high nature value’. This statement does not appear to provide for consideration of projects at an individual level.”

The NTA recommends that *“the supporting text proposed in PA-105 is deleted and any proposed text is consistent with the provisions of policy P-OR-23”*.

CE response

It is noted that the OPR recommends omission of **PA-105**, the TII recommends consultation with the Council's internal engineering staff, while the DHLGH, the Heritage Council and An Taisce welcome and support this proposed amendment. It is considered that **PA-105** should be retained, with additional clarifications, which would represent only a minor modification of the proposed amendment.

This matter has already been addressed in response to Submission 80 (OPR). Refer to the Chief Executive's Final Recommendation on Issue 7 (MA Recommendation 7) in Section 4 of this Report.

(Section 7)

Submission 83 – An Taisce

<https://consult.sligococo.ie/en/submission/slg-c44-83>

An Taisce welcomes or strongly supports the following fourteen (14) Proposed Amendments without recommending further modifications: **PA-12, PA-52, PA-58, PA-70, PA-71, PA-79, PA-81, PA-83, PA-90, PA-105, PA-106, PA-188, PA-190, PA-192.**

The comments on nine (9) other Proposed Amendments are summarized below.

Issue 1 – residential density

PA-8 introduces changes to **Section 3.2.6 Residential density** in Volume 1 (Core Strategy) of the Draft Plan.

The submission notes the paragraph relating to smaller towns and villages, stating that “*no residential density range is recommended in such settlements. Instead, the Guidelines indicate that the density of development at such locations **should respond in a positive way to the established context***”.

An Taisce considers that the wording highlighted above is too ambiguous and could conflict with the desirable focus on denser development on vacant land behind main streets.

CE Response

The quoted statement introduced in Section 3.2.6 by **PA-8** is extracted from the *Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities* (2024).

PA-8 is complemented by PA-88, which proposes corresponding changes to Section 26.1.2 Residential density (Chapter 26 – Residential development). As indicated in the CE response to Submission 52 (LDA) and 53 (Heritage Council), PA-88 specifies that “*The density ranges set out in Section 3.3 of the SRDCS Guidelines should be refined, based on consideration of centrality, and accessibility to services and public transport, settlement character, amenity and the natural environment*”.

The Planning Authority will determine the appropriate residential density for each development proposal by considering, inter alia, the settlement category, the type of area (e.g. centre, urban neighbourhood), its location and historic character, where applicable.

No further modification is required to PA-8.

Issue 2 – Strategic Settlement Policy SP-S-3

The submission suggests the addition of the words “*while simultaneously tackling dereliction*” to the new strategic settlement policy SP-S-3, introduced by PA-14.

CE Response

The suggestion is agreed. The proposed policy SP-S-3 should be modified as suggested by An Taisce. This would be a minor modification, not a material alteration.

Chief Executive's Final Recommendation

PA-14 – Insert a minor modification to the proposed **strategic settlement policy SP-S-3** as follows:

SP-S-3 Improve the built environment in County Sligo's towns through "placemaking" by promoting high-quality architecture, urban and landscape design, while simultaneously tackling dereliction, in the interest of increased environmental, economic and social sustainability, as envisioned in the National Policy on Architecture.

Issue 3 – changes to Section 7.1.3

In relation to **PA-26**, An Taisce comments that "this amendment seems to indicate a reduced ambition with regard to investing in and developing the railway network in the county by removing the words '**enhance and expand**' when referring to the Dublin-Sligo railway". It is submitted that "a reversion to the original wording is required due to its greater commitment to expanding the rail network".

CE Response

PA-26 introduces changes in the fourth paragraph of **Section 7.1.3 RSES Growth Ambition 3: Connectivity**, as follows:

Potential Investment in Sligo's rail network is addressed in RPOs 6.11 (relating to the review of Western Rail Corridor); RPO 6.13 (relating to the upgrading and extension of railway from Athenry to Sligo) and RPOs 6.15 and 6.16 (~~enhance and expand~~ relating to the feasibility of extending the Dublin-Sligo railway towards the north-west).

The paragraph, as amended, would reflect the purpose of the named Regional Policy Objectives more accurately. The entire Section 7.1, including 7.1.3, represents a summary of the provisions of the Regional Spatial and Economic Strategy. The Council cannot "commit to expanding the rail network" through its Development Plan, because the provision of rail infrastructure is outside its remit.

No further modification to PA-26 is required.

Issue 4 – new tourism development policy

An Taisce recommends additions to the last paragraph of the **new tourism development policy P-TOU-9** introduced by **PA-115**, "to include that such tourism-related developments should be ideally located near public transport routes to reduce reliance on private car use, must not impact on the integrity of European sites, and that it must be demonstrated that they can be fully supported by existing infrastructure, notably wastewater treatment".

CE Response

The suggestion is agreed. A minor modification should be applied to **PA-115** to reflect An Taisce's recommended wording. It is noted that the requirement for service infrastructure is already included in the first paragraph of the policy.

Chief Executive's Final Recommendation

PA-115 – In **Section 28.3 Tourism development**, insert a minor modification to the last paragraph of the additional **policy P-TOU-9**, as follows:

Sites in rural locations should be close to existing tourist establishments, ideally along public transport routes, where it can be demonstrated that there is a justifiable demand for new accommodation, and that the proposed development will not adversely affect the character, environmental quality and amenity of the rural area or the integrity of European sites.

Issue 5 – renewable energy and gas

Commenting on **PA-159**, relating to the future role of gas, An Taisce recommends that “any need for back-up in the short term should not equate to proposals for new gas-fired power generation being granted permission on this basis as this would cause further fossil gas lock-in”.

CE Response

PA-159 (arising from the ESB's submission on the Draft Plan) introduces the following paragraph to Section 31.3 Renewable energy:

It must be recognised that gas, particularly renewable and indigenous gas, will continue to have a role to play in the transition to a low carbon economy. As such, renewable energy developments may require support from such sources in times of high energy demand.

There is no indication in the above paragraph that “new gas-fired power generation” would be “granted permission on this basis”.

The forthcoming Renewable Energy Strategy for County Sligo will provide the basis for updating the Development Plan policies, objectives and standards relating to renewable energy developments.

No further modification to PA-159 is required.

Issue 6 – Biodiversity Net Gain (BNG) in residential public open space

The submission recommends a minor modification to **PA-172**, which introduces new standards for public open space in multi-unit housing developments. An Taisce suggests that BNG should be supported “by reference to green infrastructure such as green roofs, permeable surfacing, preferably native pollinator-friendly planting and abundant tree cover”.

CE Response

The suggestion is noted and generally agreed. A second minor modification (the first one originates from the Heritage Council's Submission 53) should be applied to **PA-172** to ensure that the new BNG requirement is supported.

Chief Executive's Final Recommendation

PA-172 - In **Section 33.3.7 Public open space in multi-unit housing schemes**, insert a minor modification to the first paragraph as follows:

Open space is required to be provided with all new housing developments. Public open space should form an integral part of the design and layout of a development and provide a connected hierarchy of spaces, with suitable landscape features, including permeable surfacing, preferably native pollinator-friendly planting, abundant tree cover, seating and provision for children's play.

Issue 7 – changes to Section 33.11

An Taisce recommends a minor modification to **PA-187**, which introduces a new paragraph to the introductory part of Section 33.11 Energy and Telecommunications Infrastructure. It suggests “a reference to a provision for native hedgerow retention, restoration and enhancement be included with regard to solar farm site boundaries, as an effective screening measure and to ensure net- biodiversity gain as result of the proposed development”.

CE Response

The suggestion is noted and generally agreed. A minor modification should be applied to **PA-187** to ensure that the new BNG requirement is supported.

Chief Executive's Final Recommendation

PA-187 – In the introductory part of **Section 33.11 Energy and telecommunications infrastructure**, insert a minor modification to the proposed paragraph as follows:

All renewable energy developments requiring connection to the national grid shall be accompanied by an assessment of all route alternatives, including alternatives to public roads. It is not considered appropriate to utilise a national road as a grid connection route when viable alternatives are available.

Native hedgerows affected by renewable energy developments shall be retained, enhanced or – where removal is unavoidable – replaced, to support biodiversity net gain (BNG).

Issue 8 – changes to Section 33.2.12 (site landscaping)

An Taisce recommends the introduction on **PA-189** of “a provision for monitoring the threat of invasive species, particularly if imported soil and stone from construction and demolition waste is being used as infill for a development proposal”. It further recommends a document titled *Ireland's 'Alien Species Soil and Stone Pathway Action Plan 2023-2027*, which proposes biosecurity guidelines for developers.

CE Response

Section 24.3 Invasive species (Volume 3 of the Draft Plan) contains several **Invasive species policies**, including **P-INV-2**, which requires all development proposals to “address the presence of invasive alien species on proposed development sites and (if necessary) require applicants to prepare and submit an Invasive Species Management Plan, in compliance with the provisions of the European Communities (Birds and Natural Habitats) Regulations 2011-2015”

No further modification to PA-189 is required.

Issue 9 – changes to Section 33.2.14 Illumination and spread of light

An Taisce recommends limiting the lighting colour temperature to maximum 2,700 K (K stands for “Kelvin”), instead of the 3,000 K specified in the new subsection by **PA-191**, to minimise harmful light pollution externalities for nocturnal animals, pollinators, insects, flora and human health. The submission refers to research conducted by Dark Sky Ireland and to its handbook titled “Environmentally Friendly Lighting Guide”.

CE Response

The recommendation is agreed. The colour temperature specified in the new subsection **Minimising light pollution** (added to Section 33.2.14 Illumination and spread of light) should in fact be limited to 2,200K, as specified in the guidance document published by Dark Sky Ireland, and as recommended by Sligo County Council’s Biodiversity Officer. This would represent a minor modification to PA-191.

Chief Executive’s Final Recommendation

PA-191 – Insert a minor modification to the fourth and fifth bullet points in the proposed new subsection on **Minimising light pollution** (in **Section 33.2.14**) as follows:

- Light pollution should be reduced by (i) shielding to ensure lighting is directed to where it is intended and needed (ii) avoid sky glow and light trespass (iii) setting appropriate lighting levels and colour (under ~~3000 K~~ 2,200 K) (v) adjusting the timing of lighting as appropriate.
- Blue light in LEDs should be limited to warmer-coloured lighting with a correlated colour Temperature (CCT) at or below ~~3000 K~~ 2,200K. This provides a balance of energy use, safety, and environmental and health impacts.

(Section 7)

Submission 88 – Office of Public Works

<https://consult.sligococo.ie/en/submission/slg-c44-88>

The Office of Public Works, as the lead agency for flood risk management in Ireland, has made a submission “specifically concerning flood risk management”.

The OPW “notes and welcomes that issues raised at draft plan stage have been addressed, including by the commitment to provide objective map showing Flood Zone Mapping overlaid on land use zoning, updating of data sources for groundwater mapping, and correction of flood zone mapping in areas noted by the OPW”.

The submission focuses on Flood Zone delineations, Justification Tests for the Proposed Amendments, and PAZ-4 (proposed rezoning at Oakfield, Sligo Town).

Issue 1 – Flood Zone delineations in Ballinacarrow, Rathcormac, Cliffony and Grange

In its previous comments on the Draft Plan, the OPW has requested information on the datasets used to establish flood zones in several settlements with watercourses not modelled in the national CFRAM or NIFM.

In response, the Second CE Report clarified that for **Ballinacarrow, Rathcormac and Cliffony**, the Flood Zones “were delineated by the SFRA as per the Flood Risk Management Guidelines, taking precautionary approach and using in-field observations”. The submission notes that additional Flood Zones have also been delineated in order to reflect flood risk in **Grange**.

The OPW recommends that “the SFRA should provide further detail on the methodology used to define and delineate the Flood Zone extents in these locations”.

CE Response

The comments and request are noted. Flood Zones were delineated by the SFRA as per the Flood Risk Management Guidelines, taking precautionary approach and using in-field observations.

The SFRA associated with the final, adopted Plan, should provide more details on the methodology used to delineate the Flood Zones associated with watercourses in Ballinacarrow, Rathcormac, Cliffony and Grange.

Chief Executive’s Final Recommendation

Add the following text/clarifications to **Section 3.3 Flood Risk Zone Mapping** of the final SFRA report associated with the adopted Plan:

Flood Zones were delineated by the SFRA as per the Flood Risk Management Guidelines, taking precautionary approach and using in-field observations.

- For Ballinacarrow, this included the size of the catchment, topography and the potential source and direction of flood paths.
- For Rathcormac, this included the size of the catchment, topography, man-made structures and the potential source and direction of flood paths.

- For Cliffony, this included the size of the catchment, topography and the potential source and direction of flood paths.
- For Grange CFRAMS mapping, local knowledge regarding the backing up of a culvert, the size of the catchment, topography, man-made structures and the potential source and direction of flood paths from surface water bodies were all taken into account in the delineation of the flood zones.

Issue 2 – Flood Zones in Strandhill

The OPW has previously noted that in Strandhill there was a small area shown at risk of flooding in the 0.5% and 0.1% AEP NCHFM extents, that had been omitted from Flood Zones A and B. The CE responded that the data had been ground-truthed and the Flood Zones included in the SFRA are appropriate.

The OPW requests that further details be provided on the ground truthing carried out to justify the omission of this area from Flood Zones A and B.

CE Response

The comments and request are noted. The SFRA associated with the final, adopted Plan, should provide more details on the ground truthing carried out to justify the omission of the respective area from Flood Zones A and B in Strandhill.

Chief Executive's Final Recommendation

Add the following text/clarifications to **Section 3.3 Flood Risk Zone Mapping** of the final SFRA report associated with the adopted Plan:

At Strandhill (at Sligo Airport), the National Coastal Flood Hazard model identifies lands including those within Sligo Airport as being at elevated risk of coastal flooding. The lands identified as being at elevated risk at Sligo Airport include an area to the immediate north of the airport buildings currently used for the People's Market. Taking into account the presence of a drain (it is not clear if the model took account of this drain), the potential source and direction of flood paths and topography, this site was identified by the SFRA to be part of Flood Zone C. The remainder of the lands within the Plan area identified by the National Coastal Flood Hazard model as being at elevated risk of coastal flooding are identified by the SFRA as being within Flood Zone A/B.

Issue 3 – Justification Tests for Proposed Amendments to Zoning (PAZ)

The submission notes that "A number of Material Alterations have proposed amending the zoning of lands in Flood Zones A and B where lands have not satisfied the Plan Making Justification Test, however the Overall Result and Decision by Planning Authority has been that the land use zoning objective reflects the existing use of the site and therefore the zoning should be retained".

The OPW indicates that the above statement "may be appropriate where the zoning in question refers to existing use of already developed lands", but in a number of cases it has been applied to undeveloped lands, as follows: **PAZ-15** (Sligo Town), **PAZ-18, 19 and 23** (Ballymote), **PAZ-34** (Enniscrone), **PAZ-62** (Easky), **PAZ-63** (Ballinafad), **PAZ-76** (Curry), **PAZ-79 and 80** (Gorteen).

The OPW requests that “any undeveloped lands in Flood Zone A should be zoned for water compatible development, and in Flood Zone B for less vulnerable usage, unless all criteria of the Plan Making Justification Test can be satisfied”.

CE Response

Most of the lands subject to the ten proposed amendments to zoning (PAZ) listed in the OPW submission have failed the Justification Tests, as clearly stated in Table 3 of the SFRA of the Proposed Amendments (Appendix IV to the SEA ER prepared in respect of the Proposed Amendments).

The only exception is **PAZ-18**, which has two components. The portion of these lands affected by flood risk are proposed to be zoned OS (open space) instead of the initial GB (green belt). Only water-compatible uses are permissible on lands zoned OS.

The Chief Executive considers that the above-listed PAZ should NOT be included in the final Plan, except for PAZ-18 for the following reason:

- **PAZ-18**– The site the subject of PAZ-18 was included in the Initial Infrastructure Assessment carried out as part of the Draft CDP. The site is deemed to be fully serviced / Tier 1 lands. The northern portion of these lands is located in Flood Zone B and is therefore proposed to be zoned OS. Development of the remaining site for residential uses would contribute to compact growth and would follow the sequential approach to zoning.

Note: In the last column of Table 3 of the supplementary SFRA, the last paragraph in each row indicates that “the land use zoning objective reflects the existing use of the site and therefore the zoning should be retained”. The “land use zoning objectives” means the initial draft zoning objective. The recommendation that “the zoning should be retained” means the initial draft zoning should be retained, not replaced with the proposed zoning according to the respective PAZ.

Chief Executive’s Final Recommendations

A. Make the Development Plan **WITHOUT** the following proposed amendments: **PAZ-15, PAZ-19, PAZ-23, PAZ-34, PAZ-62, PAZ-63, PAZ-76, PAZ-79 and PAZ-80.**

B. Make the Development Plan **WITH PAZ-18**, as proposed.

Issue 4 – PAZ-4

The submission notes that **PAZ-4** changes the zoning of a site (0.38 ha) located at Oakfield (Sligo Town), from water-compatible open space (OS) to highly vulnerable new residential (nRES), based on the Chief Executive’s recommendation CE-11Z-04 (Volume 2 of the Second CE Report, in response to Submission 138).

While acknowledging that Submission 138 was referred to the Council’s specialist SFRA consultants, who were satisfied with the justification provided in support of the proposed rezoning, the OPW indicates that “the commentary provided is insufficient to justify such an amendment”.

The OPW states that “no evidence or further analysis has been provided in the amended SFRA to justify the amendment of the Flood Zones”.

CE Response

The comments are noted. The identification of the subject lands as an area at elevated risk of fluvial flooding appears to be an aberration in the model, because this area is not connected to a surface water body.

The SFRA associated with the final, adopted Plan, should provide more details in relation to this area.

Chief Executive's Final Recommendation

Add the following text/clarifications to **Section 3.3 Flood Risk Zone Mapping** of the final SFRA report associated with the adopted Plan:

At Oakfield in Sligo Town, the CFRAMS model identifies an area at elevated risk of fluvial flooding. This appears to be an aberration in the model. This area is not connected to a surface water body. Considering the topography, the size of the catchment and the potential source and direction of flood paths from surface water bodies, this site was identified by the SFRA to be part of Flood Zone C.

Section 8

Submissions not related to Proposed Amendments

A small number of submissions raised issues or made suggestions which are not related to any of the Proposed Amendments published for consultation.

At this stage in the Development Plan review process, no new amendments can be proposed. The Elected Members may only reject or accept – with or without minor modifications – all or some of the Proposed Amendments that have been subject to public consultation.

The summaries provided below are for informational purposes. No material alterations can be made to the Draft Plan on foot of these submissions.

Submission 22 – M. Beale Pigott

This submission does not refer to a Proposed Amendment. It states that Strandhill is well provided for in terms of sports facilities and green spaces, but housing is a priority. It suggests that there should be “concessions” as to the location and number of new houses, e.g. 100 houses instead of 200, maybe located somewhere along the Airport Road.

Submission 28 – John Joe Donlon

Mr. John Joe Donlon requests that 32 acres in his ownership, fronting onto Streedagh Road in Grange, be rezoned for residential development. The Draft Plan zoned the majority of these lands as Green Belt, with a small portion zoned Open Space.

Submission 49 – Strandhill Community Development Association

This submission states that it is imperative that land be earmarked for the development of suitable community facilities, such as a community centre with indoor and outdoor sports centre. Traffic management is also an issue that needs constant review. Ongoing consultation with residents is required for making informed planning decisions.

Submission 65 – Francis Kelly

The lands (two separate sites) which are the subject of this submission are located along the Old Dublin Road, south of the Carrowroe Roundabout. The submission requests the Council to change the zoning of the lands (SL30174F and SL15855F) from GB to BIE, similar to the lands subject to PAZ-10. (Note: the two sites are not adjoining PAZ-10.)

As stated above, these submissions do not relate to any of the Proposed Amendments published for consultation. At this stage in the Development Plan review process, no new amendments can be proposed.

No decision is required to be made by the Members in relation to the above submissions.