Sligo County Council

Chief Executive's Report

on submissions and observations received in relation to the Draft Variation No. 1 of Sligo County Development Plan 2017-2023

21 September 2020

Report prepared by the Development Planning Unit of Sligo County Council under Section 13 (4) of the Planning and Development Act

Contents

1.	Introduction to the Chief Executive's Report on submissions and observations			
	1.1	Public consultation	1	
	1.2	Chief Executive's Report	2	
	1.3	Structure of the Report	2	
	1.4	What happens next	2	
2.	Chief Executive's response to submissions			
	Submission 1 (DCCAE)			
	Submission 2 (EPA)			
	Submission 3 (TII)			
	Submission 4 (DTTAS)			
	Submission 5 (M. White)			
	Submission 6 (DES)			
	Submission 7 (A. Nic Amlaidh)			
	Submission 8 (R. Gilroy)			
	Submission 9 (NWRA)			
	Submission 10 (IW)			
	Sub	mission 11 (OPR)	27	
3.	to the	osed modifications Draft Variation in accordance with hief Executive's recommendations	35	

<u>Errata (list of errors)</u>

67

1. Introduction to the Chief Executive's Report on submissions and observations received in relation to the Draft Variation No. 1 of Sligo County Development Plan 2017-2023

Planning legislation requires that the Development Plan be varied to incorporate the recent changes in national and regional policy, as introduced by the 2018 National Planning Framework (NPF) and the 2020 Regional Spatial and Economic Strategy (RSES) for the Northern and Western Region.

It is necessary to incorporate changes in designations and population growth targets into the CDP, replacing the previous designation and growth targets. There are further provisions in the NPF and RSES which require modifications to existing development plan policies.

In order to incorporate the above-mentioned changes, the Planning Authority has chosen to carry out a Development Plan variation in accordance with Section 13 of the Planning and Development Act.

1.1 Public consultation

The Draft Variation No. 1 of Sligo CDP 2017-2023 has been subject to public consultation from 27 July to 24 August 2020 (four weeks).

The document was made available for viewing and download from the County Council's website at <u>www.sligococo.ie/cdp</u>. It was also published on the County Council's Consultation Portal <u>consult.sligococo.ie</u>, which facilitates both the making of an observation and the viewing of other persons' or state bodies' submissions/observations.

In total, 11 submissions were received during the consultation period. There were three submissions from individuals and eight from state bodies, as follows:

Ref. no.	Date received	Name	on behalf of (where applicable)	Address
1	28 July 2020	Enda Brady	Department for Communications, Climate Action and Environment (DCCAE)	Wexford
2	7 August 2020	David Galvin	Environmental Protection Agency (EPA)	Iniscarra (Co. Cork)
3	7 August 2020	Michael McCormack	Transport Infrastructure Ireland (TII)	Dublin
4	20 August 2020	Jacqui Traynor	Department of Transport, Tourism and Sport (DTTAS)	Dublin
5	24 August 2020	Melanie White	n/a	Strandhill (Co. Sligo)
6	24 August 2020	Alan Hanlon	Department of Education and Skills	Tullamore (Co. Offaly)
7	24 August 2020	Áine Nic Amhlaidh	n/a	n/a
8	24 August 2020	Ronan Gilroy	n/a	n/a
9	24 August 2020	David Minton	Northern & Western Regional Assembly (NWRA)	Ballaghaderreen (Co. Roscommon)
10	24 August 2020	Susan Dempsey,	Irish Water (IW)	Dublin
11	24 August 2020	Anne-Marie O'Connor	Office of the Planning Regulator (OPR)	Dublin

1.2 Chief Executive's Report

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

- **a.** list the entities or persons who made submissions or observations;
- **b.** provide a summary of the recommendations, submissions and observations made by the Office of the Planning Regulator, and 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 proper planning and sustainable development of the area, the statutory obligations of the local authorities in the area and any relevant policies or objectives for the time being of the Government or of any Minister of the Government
- **d.** outline the Chief Executive's recommendations in relation to the manner in which those issues and recommendations should be addressed in the proposed variation.

Given the nature and detail of the issues raised, it was considered appropriate to address each submission individually and, where considered necessary, make specific recommendations for modifications to a number of Draft Amendments. None of the recommended modifications is of a material nature.

1.3 Structure of this Report

Section 2 of this report presents the summaries of submissions and the Chief Executive's opinions and recommendations regarding the issues raised in submissions.

Section 3 contains the Draft Amendments for which the Chief Executive recommended modifications, including the said modifications highlighted in green.

1.4 What happens next

After the receipt of this Report, the members have up to six weeks to consider the Draft Variation and the Chief Executive's Report. Following consideration, there are three possible outcomes:

- A. The Members may, by resolution, make (adopt) the Variation with or without further modifications. In this case, only minor modifications (i.e. not "material") may be made to the Draft Variation before it is adopted.
- B. The Members may, by resolution, refuse to make the Variation.
- **C.** The Members may propose more substantial modifications, which would require a second fourweek period of public display and consultation. Such further modifications should not have significant effects on the environment or adversely affect the integrity of any European site (SAC, SPA), and must not increase the amount of land zoned for any purpose or make additions to/deletions from the Record of Protected Structures.

In this case, a second Chief Executive's report on submissions will be prepared and submitted to the elected members for consideration.

In making a variation under Section 13 of the Act, the members of the Planning Authority 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.

2. Chief Executive's response to submissions

Submission no. 1

28 July 2020

Enda Brady (Corporate Support Unit)

on behalf of the Department for Communications, Climate Action and Environment (DCCAE)

The DCCAE's Waste Policy & Resource Efficiency division advises the Local Authority to consult directly with its respective Regional Management Planning Office "regarding the development of the final plans".

Opinion

The advice is noted. There are no implications for the Draft Variation No. 1 of the Sligo CDP 2017-2023.

Recommendation

No change to the Draft Variation is required.

Submission no. 2

7 August 2020

David Galvin (SEA Section) on behalf of the Environmental Protection Agency (EPA)

Issue no. 1

The EPA indicates that it provides a "self-service approach" for land use plans at county and local level, through the guidance document *SEA of Local Authority Land Use Plans* – *EPA Recommendations and Resources.* The Agency recommends that the Planning Authority takes this document into account and incorporates its recommendations as relevant and appropriate to the Variation.

Opinion

Noted. The Draft Variation No. 1 does not propose changes to CDP policies or objectives related to the environment. The guidance document will be taken into account when carrying out Strategic Environmental Assessment in conjunction with the County Development Plan review and preparation of a new Plan.

Recommendation

No change to the Draft Variation is required.

Issue no. 2

The EPA notes the Planning Authority's determination that the Draft Variation is not likely to have significant effects on the environment. It is recommended that guidance available on the EPA's website (the same document mentioned under Issue 1 above) is taken into account before finalising the SEA Screening Determination.

Opinion

Noted. The procedural recommendations contained in the EPA guidance document will be taken into account before finalising the SEA Screening Determination associated with the CDP Variation No. 1 as adopted.

Recommendation

No change to the Draft Variation is required.

Issue no. 3

The Agency indicates that Sligo County Council should ensure the following:

- that the Variation is consistent with the need for proper planning and sustainable development
- that 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 Variation;
- that the Variation aligns with key relevant higher-level plans and programmes and is consistent with the relevant objectives and policy commitments of the National Planning Framework and the Northern & Western Regional Spatial and Economic Strategy;

In considering the Variation, "Sligo County Council should take into account 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".

Opinion

The purpose of the Draft Variation is precisely to align the County Development Plan with higherlevel planning strategies, such as the NPF and the RSES. The Draft Variation does not propose additional development that would need to be serviced.

The Planning Authority will undertake an assessment of critical service infrastructure in conjunction with the review of the Sligo CDP 2017-2023 and the preparation of a new Plan.

Recommendation

No change to the Draft Variation is required.

Issue no. 4

The EPA recommends that, in preparing the Variation, consideration be given to the key issues and challenges described in the most recent *State of the Environment Report* (2016).

Opinion

The *State of the Environment Report* (EPA, 2016) was taken into consideration when preparing the Sligo CDP 2017-2023.

Recommendation

No change to the Draft Variation is required.

Issue no. 5

The EPA indicates the internet location of various SEA resources and guidance and signals the launching of the Environmental Sensitivity Mapping (ESM) Web Tool, which can help planners examine environmental considerations and allows users to create plan-specific environmental sensitivity maps from over 100 datasets.

Other recommended tools are the EPA WFD Application, accessed through EDEN (an EPA database) and available to public agencies, and the EPA AA GeoTool, developed in partnership with the NPWS.

Opinion

The recommended resources and web tools are noted and will be used in conjunction with the SEA of the future Sligo CDP (2023-2029).

Recommendation

No change to the Draft Variation is required.

Issue no. 6

The Agency indicates that any changes made to the Draft Variation prior to finalisation should be screened for potential likely significant effects in accordance with the criteria set out in Schedule 2A of the SEA Regulations. The Variation should also comply with the Requirements of the Habitats Directive, where relevant.

As soon as practicable after making a SEA Determination, a copy of the decision (including reasons for not carrying out an environmental assessment) should be made available to the public and sent to the environmental authorities consulted.

Opinion

In accordance with Planning legislation, the Planning Authority will ensure that any proposed modifications to the Draft Variation are screened for potential effects on the environment in general and on Natura 2000 sites in particular.

A copy of the SEA Determination and associated decision will be made available to the public and communicated to the relevant environmental authorities, as required by Planning legislation.

Recommendation

No change to the Draft Variation is required.

Submission no. 3

Michael McCormack, Senior Land Use Planner on behalf of Transport Infrastructure Ireland (TII)

Issue no. 1

Transport Infrastructure Ireland (TII) welcomes referral of Draft Variation no. 1 to the Sligo County Development Plan, 2017 - 2023. The Transport Authority has no specific observations to make with regard to the proposed text amendments set out in the Draft Variation.

Opinion

Noted.

Recommendation

No change to the Draft Variation is required.

Submission no. 4

20 August 2020

Jacqui Traynor (Reform Communications and Emergency Planning) on behalf of the Department of Transport, Tourism and Sport (DTTAS)

Issue no. 1

The Department of Transport indicates that the 2009 *Smarter Travel Policy* and the 2015 *Strategic Investment Framework for Land Transport (SILFT)* are set to be replaced. Alongside the sustainable mobility policy review, the Department is finalising a review of the SIFLT to ensure consistency of approach across Government in relation to Project Ireland 2040 and will shortly launch a public consultation on a revised set of priorities to guide transport investment in the years ahead.

Opinion

Noted. The new or revised transport policy documents will inform the preparation of the future Sligo CDP 2023-2029. There are no implications for the Draft Variation No. 1 of the Development Plan 2017-2023.

Recommendation

No change to the Draft Variation is required.

Issue no. 2

The DTTAS provides the following update in relation to the review of the Western Rail Corridor (WRC), which is mentioned in the last paragraph of the Draft Amendment No. 56 (on p. 57 of the Draft Variation document):

larnród Éireann commissioned a financial and economic appraisal of a proposed reopening of Phases 2 and 3 of the WRC and, in late 2019, submitted a draft copy of that appraisal to the Department. In recent weeks a final copy of the report has since been received. As was signalled publicly at the time of the commissioning of the appraisal, and as is required under the Public Spending Code (PSC), the Department has been reviewing the documentation that has been received and engaging with larnród Éireann and the consultants as required during this review. Once that review is complete the matter will then be brought to Government for its decision and the report published as soon as practical thereafter.

Opinion

The update is welcome. The last paragraph of the Draft Amendment No. 56 states that "RPOs 6.9, 6.11 and 6.13 to 6.16 promote further investment in upgrading or providing transport infrastructure, including the Eastern Garavogue Bridge and Western Distributor Road in Sligo, Western Rail Corridor, Sligo-Dublin rail line, smarter travel etc."

The above paragraph accurately reflects the NWRA's position regarding the WRC, as expressed in the RPOs 6.11 and 6.13.

Neither the DTTAS nor the NWRA submission highlights any inconsistency between the provisions of the Sligo CDP and those of the RSES with regard to the Western Rail Corridor.

However, it is acknowledged that it will be necessary to update the narrative, policies and objectives contained in Section 8.4.2 of the CDP (which relates to the rail network) as part of preparation of the next CDP 2023-2029, in consultation with all relevant stakeholders, upon completion of the above-mentioned report and the issuing of the Government's decision.

Recommendation

No change to the Draft Variation is required.

Issue no. 3

The Department of Transport highlights the publication of the *Local Link Rural Transport Programme Strategic Plan 2018-2022* (National Transport Authority, 2018) and the "whole of Government" *National Disability Inclusion Strategy (NDIS) 2017-2021*.

Noting that local authorities are key stakeholders in ensuring a universal design approach to the built environment, the DTTAS offers assistance with appropriate updated text for the varied County Development Plan.

Opinion

Noted. The highlighted publications will inform the preparation of the future Sligo CDP 2023-2029. There are no implications for the Draft Variation No. 1 of the Development Plan 2017-2023.

Recommendation

No change to the Draft Variation is required.

Submission no. 5

Melanie White Owner at Rebelle Surf, Strandhill

Issue no. 1

The submission highlights a variety of issues related to her business (surf school) in Strandhill.

Opinion

Noted. None of the highlighted issues is relevant for the currently proposed Variation. There are no implications for the Draft Variation No. 1 of the Development Plan 2017-2023.

Recommendation

No change to the Draft Variation is required.

Submission no. 6

24 August 2020

Alan Hanlon (Site Acquisitions and Property Management Section) on behalf of the Department of Education and Skills

Issue no. 1

The Department notes that the "projected growth figures for the county in 2031 will now be 75,500, which represents an increase of c. 10,000 on the 2016 census figure for the county (Section 3.1.4)".

The Department also notes that "future projections to 2031 will now be an addition to the CDP", and therefore "the ramifications for any future educational requirements extend beyond the life of this plan".

It is considered "vitally important that ongoing and future engagements between the Department and the Council take into consideration both the short term and the longer term population projections that are being proposed", in order to identify "future education requirement within the county".

Opinion

The Implementation Roadmap attached to the 2018 National Planning Framework provides a transitional set of population projections to inform city and county development plans for the periods to 2026 and 2031. The population of County Sligo is projected to grow from 65,500 (in 2016) to 71,500-72,500 by 2026 and to 74,000-75,500 by 2031.

It should be noted that both 2026 and 2031 are beyond the lifetime of the Sligo CDP 2017-2023, to which the currently proposed Variation relates.

The adjusted County population figure for 2023 (based on NPF projections) is 71,660, as indicated in the amended Table 3.1 in Section 3.4.1 (Draft Amendment no. 29). This is lower than the figure of 77,350 currently stated in the CDP.

Having regard to this decrease in the projected County population by 2023, there would be no additional requirements for educational facilities during the lifetime of the current Development Plan.

The County Council will engage with the Department of Education when preparing the next CDP 2023-2029 in order to identify the future education requirements within the county.

Recommendation

No change to the Draft Variation is required.

Submission no. 7

24 August 2020

Áine Nic Amhlaidh

Issue no. 1

The submission quotes population figures and considerations for Strandhill, extracted from a pre-draft consultation paper published by Sligo County Council in 2012.

Concerns are expressed in relation to the "serious detrimental and permanent negative implications for the village of Strandhill" resulting from the proposed amendments DA-17 and DA-27.

Opinion

The Draft Amendment No. 17 (DA-17) relates to overall Sligo County and City population projections and targets, as set by the NPF (Implementation Roadmap) and RSES.

The Draft Amendment No. 27 (DA-27) merely indicated that the Development Plan "has been" (i.e. is in the process of being) amended to take account of the revised population targets and projections.

DA-17 does not include amended population targets, projections or recommended levels for Strandhill or any other village in County Sligo. DA-27 does not refer to any lower-tier settlement either.

The modified Core Strategy Table B (Refer to the Draft Amendment No. 35) does not provide any population target, projection or recommended level for Strandhill and the other 31 villages where land has been zoned for residential uses.

Any changes in the recommended population levels in the 32 villages for which mini-plans have been prepared will be subject to public consultation as part of the preparation of the next Sligo County Development Plan 2023-2029.

Recommendation

No change to the Draft Variation is required.

Issue no. 2

The submission states that the provision of a looped trail through an SAC at Killaspugbrone (Strandhill) is "in direct contravention of the Co. Sligo Development Plan which prohibits any development within 80 meters of the sea. This looped trail as approved without the required Appropriate Assessment in a Special Area of Conservation".

It is also stated that "in October 2013 the rezoning from greenbelt to residential and the inclusion thereof in the draft amendment is in direct contravention of the Planning Act 2000 and government

legislation prohibiting the inclusion of land rezoning in draft amendments unless expressly for the purposes of roads or infrastructural requirements".

Opinion

The concerns are noted. However, they are not related to the currently proposed Variation and cannot be considered in this report.

Recommendation

No change to the Draft Variation is required.

Submission no. 8

24 August 2020

Ronan Gilroy

Issue no. 1

The submission notes that Sligo City's targeted growth of 4,400 persons by 2026 and suggests "attractions" that could help achieve such population increase.

These "attractions" are related to lifestyle (quick access to a variety of outdoor activities) and to "modern options and ways of living".

It is suggested that "smart CoHousing clusters" should replace nursing homes, retirement villages and the retrofitting of old housing units. It is clarified that the co-housing model is different from co-living, but no further details are offered. A link to soa.ie (Self Organised Architecture) is provided for more information. The website contains, inter alia, references to co-housing developments in other European countries.

Opinion

The suggestions are noted. However, they are not related to the currently proposed Variation and cannot be considered in this report. Due consideration will be given to alternative housing options as part of the forthcoming Sligo and Environs Local Area Plan and the future Sligo CDP 2023-2029.

Recommendation

No change to the Draft Variation is required.

Submission no. 9

David Minton, Director on behalf of the Northern & Western Regional Assembly (NWRA)

The NWRA submission is made in accordance with Section 27C of the Planning and Development Acts, which requires the Regional Assembly to state whether – in the opinion of the Assembly – the draft variation of the development plan and, in particular, its core strategy, are consistent with the Regional Spatial and Economic Strategy.

The submission addresses a wide range of issues and makes **22 recommendations**, most of them relating to a specific Draft Amendment. Several recommendations relates to more than one Draft Amendment, while recommendation no. 22 does not refer to any of the Draft Amendments.

The context of the recommendations is summarised as "issues" below. The text or summary of the recommendations is also included, followed by the Chief Executive's comments/opinion and his recommendation regarding the opportunity to make minor modifications to any of the Draft Amendments.

Issue no. 1 (NWRA recommendation on DA-1)

The NWRA notes that the Draft Variation "refers to Sligo Town as a City and this is not consistent with the new language of the NPF and RSES whereby it is acknowledged that it is a significant town and a Regional Growth Centre".

"It is recommended that reference to Sligo City be omitted and refer instead to Sligo as a significant town that functions in a similar manner but at a different scale to the bigger cities and has accordingly been designated as a Regional Growth Centre."

Opinion

"Sligo City" has been in use for 20 years without being seen as inconsistent with national and regional planning policy. The term "City" has been chosen by the Members and the Executive of Sligo County Council to reflect the local community's vision and growth ambitions. The name "Sligo City" appears in the Local Authority's corporate and sectoral plans and strategies.

The term "Sligo City" is used in relation to the existing urban area of Sligo and Environs. This is not the same as the Regional Growth Centre area, a virtual entity which includes three of Sligo City's satellite villages and the surrounding rural area.

The purpose of the Draft Amendment No. 1 is precisely to introduce the new designation of "Regional Growth Centre" for Sligo.

Recommendation

No change to the Draft Variation is required in respect of Issue no. 1.

Issue no. 2 (NWRA recommendation on DA-3)

"In making reference to the NSS being replaced by the NPF, it would be appropriate to confirm that the NPF is the Government's high-level strategic plan for shaping the future growth and development of the country to 2040."

Opinion

Agreed.

Recommendation

Insert additional wording in the Draft Amendment no. 3, indicating that the NPF is the Government's high-level strategic plan for shaping the future growth and development of the country to 2040.

Issue no. 3 (NWRA recommendation on DA-4)

- **A.** "The opening paragraph which refers to the former Border RPG's should confirm that the RPGs for the Border region have been replaced by the RSES. Thereafter, the text should include the proposed narrative on the RSES and to include that the RSES has introduced the concept of a Growth Framework that incorporate 'Five Growth Ambitions' that define each priority and how they are mutually complementary".
- **B.** "Confirm that the vision is for a region that is smarter, greener, more specialised and connected, with a stronger and more compact urban network, focusing on 'People' and 'Places'. The RSES brings a new "place-based" approach that from an enterprise development perspective, is key to delivering the elements that inform business location choices and this should be stated".
- C. "The narrative, as proposed, refers to the 'streamlining' of the Regional Assemblies in 2015 but this is not correct and should be modified. Under the Local Government Reform Act 2014 a number of changes were made to the regional structures in Ireland. It was the eight Regional Authorities that were dissolved on 1st June 2014 and their functions were transferred to the Regional Assemblies with three Regional Assemblies being established on 1st January 2015 the Northern & Western Regional Assembly, the Eastern & Midlands Regional Assembly and the Southern Regional Assembly."
- **D.** The narrative of DA-4 "may be understating the significance given to Sligo" in the RSES. "It would be preferable for the wording to be amended to confirm the position of Sligo within the settlement hierarchy. It should state that the settlement hierarchy of the RSES includes one Metropolitan Area (Galway), three Regional Growth Centres (Sligo, Letterkenny and Athlone), and a network of 'Key Towns'."

"The narrative should also state that the Regional Growth Centres have been designated as they fulfil city-like roles to a greater extent than elsewhere and that they perform as regional drivers that have the potential to grow as centres of scale."

E. "The language should reflect that the RSES sets a target of at least 40% increase in the population for the Sligo Regional Growth Centre"

Opinion

The Comments are noted.

DA-4 relates to the main provisions of the RSES in relation to Sligo. It is not considered necessary to include in the Sligo CDP 2017-2023 an extensive and detailed description of the RSES' structure, contents or provisions that do not warrant an amendment to the Development Plan

However, there is no objection to making minor modifications to the text of DA-4.

Recommendation

- A. Insert additional wording in the Draft Amendment no. 4, indicating that the RPGs for the Border region have been replaced by the RSES.
- B. No change required.
- C. Replace "streamlining" with "restructuring", in relation to Regional Assemblies.

- D. Insert additional wording in the Draft Amendment No. 4, highlighting the position and significance of Sligo Regional Growth Centre in the settlement hierarchy of the RSES.
- E. Replace "a 40% increase in Sligo City's population" with "at least 40% increase..."

Issue no. 4 (NWRA recommendation on DA-5)

"The proposal to replace the term 'Gateway' with 'Regional Centre' should be amended to 'Regional Growth Centre'."

Opinion

Agreed.

Recommendation

In DA-5, replace "Regional Centre" with "Regional Growth Centre".

Issue no. 5 (NWRA recommendation on DA-6)

"The comment given to Amendment 1 is also applicable to this proposed amendment."

Opinion

Noted. Refer to the Chief Executive's response to Issue no. 1.

Recommendation

No change to the Draft Variation is required in respect of Issue no. 5.

Issue no. 6 (NWRA recommendation on DA-7)

"The comment given to Amendment 1 is also applicable to this proposed amendment."

Opinion

Noted. Refer to the Chief Executive's response to Issue no. 1.

Recommendation

No change to the Draft Variation is required in respect of Issue no. 6.

Issue no. 7 (NWRA recommendation on DA-8)

"S1.3 should also include a narrative on the RGCSP and how a future LAP shall add further detail."

Opinion

Section 1.3.2 of the CDP relates to past demographic trends in twelve electoral divisions surrounding Sligo City. It is not the appropriate section to insert any narrative regarding the Regional Growth Centre designation or any details to be included in the future Sligo and Environs LAP

Recommendation

No change to the Draft Variation is required in respect of Issue no. 7.

Issue no. 8 (NWRA recommendation on DA-10)

"There is a need to refresh S1.4 to reflect the Regional Growth Centre Strategic Plan (RGCSP) more substantially and to provide reference to those regionally significant projects to be advanced as contained in the RGCSP."

Opinion

Section **1.4 Recent trends and implications for the County Development Plan** relates to past events. There is nothing in Section 1.4 of the CDP that could be considered inconsistent with national and regional policy. The text of this section will be updated as part of the preparation of the next CDP 2023-2029.

Recommendation

No change to the Draft Variation is required in respect of Issue no. 8.

Issue no. 9 (NWRA recommendation on DA-11)

- **A.** "The proposed wording should be modified so that it confirms that 'Sligo County Council remain determined to drive the development of the Sligo Regional Centre and County towards the vision set out in the NPF and RSES' rather than the NSS as stated."
- **B.** "Furthermore, the proposed wording (Pg15) states that the 'most relevant' RPOs have been incorporated it is unclear what this means as all relevant RPOs should be reflected so that the plan is consistent with the RSES."

Opinion

There is no objection to making minor modifications to the text of DA-11, as suggested.

Recommendation

- A. In DA-11, insert a statement indicating that Sligo County Council remains determined to drive the development of the Sligo Regional Centre and County towards the vision set out in the NPF and RSES.
- **B.** In the second-last paragraph, replace "the most relevant" with "the relevant" in relation to RPOs.

Issue no. 10 (NWRA recommendation on DA-14)

- A. "The language and tone of the NPF differs markedly from the NSS and therefore this section of the development plan would benefit from further reconfiguration by either, deletion of the opening paragraph, or, as an alternative should it be decided to retain the historical context then it should make it clear that the NSS is the predecessor to the NPF, thus making it clear that the NPF is the new policy framework.."
- **B.** "This section would also benefit from setting the context that the NPF has identified that the Northern and Western region has historically had a lower level of urbanisation compared to other regions and that one of the biggest challenges it faces is the identification and implementation of actions that will build up its urban structure. It would also benefit from confirmation that significant towns such as Sligo function in their areas in a similar manner, but at a different scale to the bigger cities."

C. "The narrative would benefit from inclusion of confirmation that the NPF is underpinned by the National Development Plan (NDP) which sets the framework for national capital investment to 2027. It should further confirm that the NPF is supported by the Implementation Roadmap for the National Planning Framework (July 2018) and that it sets out a programme for the implementation of the NPF and includes transitional population projections at Regional and County level to inform development plans".

Opinion

A. The opening paragraph of Section 3.1.2.A is factual and correct. It is indeed being retained for clarity regarding the policy context which provided the basis for the CDP 2017-2023.

The amending text refers to the "2018 NPF", which is obviously the successor of the 2002 NSS.

- **B.** The NPF is not the first national planning document that has identified the North-West as having a weak urban structure or Sligo as having a significant development potential. The NSS has already done this in 2002, and has recognised the functional role and development potential of Sligo by designating it a Gateway City.
- **C.** The Implementation Roadmap and references to its population projections have already been detailed in DA-18, which introduces a new Section (3.1.4) in the CDP.

There is no objection to inserting a reference to the NDP in DA-14.

Recommendation

- A. No change required.
- **B.** No change required.
- C. At the end of DA-14, insert a paragraph indicating that the NPF is underpinned by the National Development Plan (NDP) which sets the framework for national capital investment to 2027.

Issue no. 12 (NWRA recommendation on DA-15)

- A. "The proposed amendment is set within the context of the opening paragraph (indicated as being retained) that relates to the former RPG for the Border Region and the plan would benefit from this paragraph being deleted. Alternatively, it should reference the RPGs as being the predecessor to the RSES, making it clear that the RSES is the new regional framework."
- **B.** "The narrative should be amended to further reference that the RSES seeks to promote the vitality and viability of smaller towns, villages and rural areas. It should commit to RPO 3.7 regarding the provision of serviced sites and to incorporate the requirement of RPO 3.13 and in that regard confirm the identity of those settlements (If these are the 'Key Support Towns' as identified in Map 3.A, then a statement to this effect would be welcome). It should be noted within the narrative that the development of brownfield sites is also necessary within urban areas."
- **C.** "The term 'Key Support Towns' would benefit from being referred to as 'Support Towns' or some other term, so that there is no confusion with the 'Key Towns' defined within the RSES."

Opinion

A. The opening paragraph of Section 3.1.2.B is factual and correct. It is indeed being retained for clarity regarding the policy context which formed the basis for the CDP 2017.

The amending text refers to the "2020 RSES", which is obviously the successor of the 2010 RPGs.

B. There is no objection to inserting additional wording in DA-15 stating that the RSES seeks to promote the vitality and viability of smaller towns, villages and rural areas.

Any commitment to providing serviced sites in specific locations would be a matter more appropriate for the next CDP 2023-2029. The identification of serviceable sites and the feasibility appraisals cannot be carried out in the absence of consultation with infrastructure providers (e.g. Irish Water), other Local Authority departments (including Corporate, Finance, Housing, Roads, Water Services) and the general public.

It is noted that RPO 3.3 requires the delivery of "at least 20% of new housing in rural areas on brownfield sites", without any reference to urban areas.

In the Draft Variation, brownfield lands in urban areas are already mentioned in DA-32 and DA-51. However, there is no objection to the inclusion of a reference to brownfield sites in urban areas in DA-15 also.

C. The designation "Key Support Towns" for Ballymote, Enniscrone and Tobercurry was adopted by the Council in 2005, 15 years before the publication of the RSES. It is considered that County Sligo's Key Support Towns cannot be mistaken for the RSES-designated Key Towns, particularly in the Sligo CDP, where there is no reference to regional Key Towns.

The opportunity of retaining or changing the designations of towns and villages in Sligo's Settlement Hierarchy will be considered as part of the preparation of the next CDP 2023-2029

Recommendation

- A. No change required.
- **B.** In DA-15, insert an additional sentence stating that the RSES seeks to promote the vitality and viability of smaller towns, villages and rural areas and replace "brownfield sites in rural areas" with "brownfield sites in urban and rural areas".
- C. No change required.

Issue no. 13 (NWRA recommendation on DA-18)

The NWRA indicates that the NPF contained a typographical error under the 2026 population column for the NWRA. The figures should be 942,500 -961,500 and not 942,500 - 986,500.

Opinion

Noted. The figures in the table included in DA-18 should be corrected to reflect those in Table 2 (p. 40) of the RSES.

Recommendation

In the table contained in DA-18, replace the figure 986,500 with 961,500 and add 1,014,500 in the column for 2031.

Issue no. 14 (NWRA recommendation on DA-20)

"The proposed amendments are generally considered appropriate but would benefit from amending the term 'Key Support Town' to 'Support Towns' or an alternative term – to avoid confusion with the 'Key Towns' of the RSES as referred to above under No.17. Furthermore, it would be appropriate to include the villages of Ballysadare, Strandhill and Rosses Point under the heading of the Sligo RGC".

Opinion

Noted. Please refer to the Chief Executive's response to Issue no. 12.C above.

Recommendation

No change is required to the DA-20 in respect of Issue 14.

Issue no. 15 (NWRA recommendation on DA-21)

"The proposed amendments are considered appropriate and while they reference that there are twentyone Regional Policy Objectives bespoke to the Sligo RGC, they do not translate them into objectives/policy but leave this to a subsequent LAP. This approach fails to make the Policy Framework consistent with the RSES.

Accordingly, it is recommended that meaningful effect is given to RPOs, including those relevant to the RGC, through objectives/policies within this proposed Variation. Matters of further detail may need to be developed through the proposed LAP for the Regional Growth Centre. This should also include but not be limited to:

- the preparation of a Building Heights Study (RPO 3.7.44).
- Support development of a major tourist attraction (RPO 3.7.56)".

Opinion

The lack of detail regarding RPOs relating to the Regional Growth Centre cannot be considered to be an inconsistency between the CDP and the RSES, especially since the vast majority of RPOs refer exclusively to Sligo City, the principal urban area of the RGC. It is noted that some of these RPOs may no longer be relevant, as they have already been or are being implemented (e.g. RPO 3.7.41 relating to the Western Distributor Road, currently under construction, or RPO 3.7.43 relating to increasing junction capacity along the N4/N15).

There is no objection to the inclusion of a list of the RPOs for Sligo RGC as an appendix to the Sligo CDP 2023-2029.

However, proposals for specific policies and objectives derived from Sligo RGC RPOs would be more appropriately considered during the preparation of the next CDP 2023-2029, while proposals for specific policies and objectives relating to the Sligo and Environs urban area would be more appropriately considered as part of the forthcoming LAP preparation.

Recommendation

A list of the Sligo RGC RPOs shall be included as an appendix to the Development Plan. The Draft Amendment DA-21 should include a reference to this appendix.

Issue no. 15 (NWRA recommendation on DA-22)

"The proposed amendments are considered appropriate, but it should be clarified that the villages of Ballysadare, Strandhill and Rosses Point are within the Regional Growth Centre."

Opinion

There is no objection to the inclusion of the suggested clarification.

Recommendation

In DA-22, insert an additional sentence indicating that the villages of Ballysadare, Strandhill and Rosses Point are within the boundaries of the Regional Growth Centre area.

Issue no. 16 (NWRA recommendation on DA-32 to DA-35)

- A. "Amendment 32 makes reference to RPO 3.2(b) and states that this provision 'could be interpreted as a requirement to accommodate 40% of the additional population (2,640 persons) within the existing built-up area of Sligo and Environs, in housing units built on infill and brownfield sites (i.e. within the CSO-defined Census boundary)'. This statement should confirm that it is to be interpreted as a requirement to accommodate 40% of the additional population (2,640 persons to 2032) within the existing built-up area of Sligo and Environs, in housing units built on infill and brownfield sites (i.e. within the existing built-up area of Sligo and Environs, in housing units built on infill and brownfield sites (i.e. within the existing built-up area of Sligo and Environs, in housing units built on infill and brownfield sites (i.e. within the existing built-up area of Sligo and Environs, in housing units built on infill and brownfield sites (i.e. within the existing built-up area of Sligo and Environs, in housing units built on infill and brownfield sites (i.e. within the CSO-defined Census boundary)."
- B. "Provide a commitment that the LAP will identify an appropriate quantum of land for the initial six year cycle of the LAP, with any remainder being held as 'residential reserve' landuse zoning for the subsequent period. This to be articulated through a 'Core Strategy Table."
- C. "The methodology used to estimate population and housing targets to be revisited and provide further clarity, having regard to the following:
 - i. The period 2016 to 2026 should be interpreted as ten years rather than eleven.
 - ii. The period 2016 to 2023 should be interpreted as seven years rather than eight.
 - iii. Clarification why number of units to be delivered through 'mixed use' landuse zoning has not been stated.
 - iv. Account to be taken of requirement that 40% of housing is to be within the existing built-up footprint of the Regional Growth Centres.
 - v. Account to be taken of the requirement that 30% of all new housing that is targeted to be within settlements is to be within the existing built-up footprints (RPO 3.2 (c) refers).
 - vi. Account to be taken of extent of rural housing to be provided.
 - vii. Justification for occupancy ratio of 2.0 in Sligo Town and 2.2 elsewhere. This appears somewhat low.
 - viii. Insert a Core Strategy Table in accordance with the illustrative example provided within the 2010 Guidance Note for Core strategies issued by the then DEHLG."

Opinion

A. It is noted that the RSES does not define "the existing built-up footprint" mentioned in RPO 3.2(b). The meaning of this term was eventually found in the end-note 12 in Appendix 3 of the NPF.

However, there is no objection to replacing "could be interpreted" with "is interpreted" in DA-32.

- B. The modified Core Strategy Table B (refer to Point C (viii) below) will include the housing land requirement for Sligo and Environs to 2023, i.e. until the end of the current CDP period this is 55 ha. Having regard to the lack of development in the past decade and the current availability of circa 43 ha, the 55-ha provision is considered sufficient to cater for the six-year period of the forthcoming LAP. There is already a substantial Strategic Land Reserve in place for Sligo and Environs (514 ha of land previously zoned for residential and mixed uses).
- C. Points (i) and (ii) agreed.

Point (iii) – the residential potential of mixed-use lands should be added to the modified Core Strategy Table B.

Points (iv) and (v) – account shall be taken as suggested at the time of reviewing or preparing local area plans for settlements.

Point (vi) – the "extent of rural housing to be provided" cannot be quantified, as it depends on many variables which are not under the control of the Planning Authority. However, the modified Core Strategy Table B can indicate the quantum of population allocated to rural areas.

Point (vii) - Having regard to the indications regarding decreasing household sizes, as found in the NPF (Section 5.7 Housing, p. 88) and to the observations and experience of Sligo County Council's Planning staff, the following assumptions have been used in calculating the housing land requirement shown in the Core Strategy Table B (as modified):

Assumptions regarding average household sizes

- **A-1.** Empirical evidence obtained through pre-planning meetings indicates that the households most likely to seek new family homes in County Sligo usually consist of a young couple and at most one child (or no child). Therefore, the average household size for calculating the housing requirements of additional population, assumed to be composed mainly of newly-formed households, has been set at 2.2 persons.
- A-2. The above average household size has been decreased to 2 persons for the Sligo and Environs area, where there is a growing housing demand from one-person households, mostly older people living alone. This demographic segment is growing faster in the Sligo and Environs area than in other parts of the County.

Point (viii) – Agreed. The Core Strategy Table B should be modified to include the revised population allocations resulting from reapportioned NPF projections and RSES targets, based on seven years out of ten, instead of eight years out of eleven. The modified table should include the housing potential of lands zoned for mixed uses. It should be accompanied by a text section containing assumptions, rationale and explanatory notes in relation to the population and housing land figures.

The Core Strategy Table A (relating to future population and housing land requirements in the Sligo and Environs area) should also be modified to correspond to Table B.

Recommendation

- A. In DA-32, replace "could be interpreted" with "is interpreted".
- B. No change on foot of this sub-issue.
- C. In the Draft Amendment No. 35, modify the Core Strategy Table B as suggested and add a text section containing assumptions, rationale and explanatory notes in relation to the population and housing land figures.

In the Draft Amendment No. 34, modify the Core Strategy Table A (Sligo and Environs) to correspond with the modified Core Strategy Table B (DA-35).

Modify the Draft Amendments DA-28, DA-29, DA-32 and DA-33 to reflect the revised figures in accordance with the NWRA (and OPR) recommendations.

Issue no. 17 (NWRA recommendation on DA-43 to DA-49)

"The proposed amendments do not appear to fully integrate the Regional Policy Objectives of the RSES Growth Strategy – Growth Ambition 3 - in respect of these sectors nor the RSES more broadly."

"The proposed amendments are considered appropriate, but it fails to make the policy framework consistent with the RSES. Accordingly, it is recommended that meaningful effect is given to the suite of RPOs within the RSES, in particular those within Growth Ambition 1 of the RSES – see further under 'Additional Recommendations'."

Opinion

The RPOs included under Growth Ambition 1 (Economy and Employment – Vibrant Region) and under Growth Ambition 3 (Connectivity – Connected Region) are either high-level/aspirational or very specific, even to project level.

All relevant RPOs specific to County Sligo have been incorporated in the Draft Variation. The highlevel RPOs will be taken into consideration when reviewing economic development and transport policy as part of the preparation of the next CDP 2023-2029.

The submission does not give any details of the "inconsistency" with the RSES. It is considered that the Draft Variation, after including the Chief Executive's recommendations for modifications as set out in this Report, will be fully consistent with both the NPF and the RSES.

Recommendation

No change to the Draft Variation is required in respect of Issue no. 17.

Issue no. 18 (NWRA recommendation on DA-50)

"The observations made to Draft Amendments 32 - 35 are applicable here. Furthermore, provide clarification explaining the origins of the population target range of between '5,088 and 6,325"

Opinion

Refer to the Chief Executive's opinion on Issue no. 16 relating to the NWRA recommendations regarding DA-32 to DA-35.

The figures in DA-50 should be modified to correspond with the modified Core Strategy Table B.

Recommendation

In DA-50, replace the population figures to correspond with the modified Core Strategy Table B.

Issue no. 19 (NWRA recommendation on DA-51 to DA-53)

"This amendment is appropriate, subject to the narrative being modified to reflect RPO 3.2(c) which requires the delivery of at least 30% of all new homes targeted in settlements (with population of at least 1,500) to be within the existing built-up footprints"

Opinion

The provision of RPO 3.2(c) is already reflected in the proposed new strategic housing policy SP-HOU-5 (DA-52). However, there is no objection to the inclusion of a similar statement in DA-51.

Recommendation

In DA-51, include wording in relation to the delivery of at least 30% of new homes that are targeted in settlements with a population of at least 1,500 (other than the regional Growth Centre) within the existing built-up footprints.

Issue no. 20 (NWRA recommendation on DA-54)

"Include more substantive narrative to the support that the RSES gives to the various transport provisions through the RPOs, especially those contained within Growth Ambition 3 and referenced below under the heading 'additional Recommendations'"

Opinion

The RPOs included under Growth Ambition 3 (Connectivity – Connected Region) are either high-level/aspirational or very specific, even to project level.

All relevant RPOs specific to County Sligo have been incorporated in the Draft Variation. The highlevel RPOs will be taken into consideration when reviewing transport policy as part of the preparation of the next CDP 2023-2029.

Recommendation

No change to the Draft Variation is required in respect of Issue no. 20.

Issue no. 21 (NWRA recommendation on DA-55 and DA-56)

- A. "Make amendments to the text so that it is clear that the Border RPGs have been superseded by the RSES."
- B. "Include more substantive narrative to confirm the support that the RSES gives to the various transport provisions through the RPOs, especially those contained within Growth Ambition 3.

The development plan should reflect the overwhelming support given to the reopening of the Western Rail Corridor as a priority within the narrative of Chapter 6.8 (Pages 222-223) and RPOs 6.11 and RPO 6.13.

The narrative in respect of the former Border RPGs is perhaps of interest but it is the RSES that is the current policy framework and it should receive greater detail to reflect its relevance and support within the Sligo Plan."

- C. "Amend Policy P-PT-5 to align more closely with that of RPO 6.11 and taking account of the current Programme for Partnership Government."
- D. "The narrative should outline that the RSES highlights that this region is highly dependent upon the private car and it requires that land-use and transport planning is better integrated in a manner that enhances the connectivity of people and places by promoting sustainable transport options for people of all age groups and levels of mobility and to reduce dependency upon the private car. The RSES reflects the need for an attractive, effective transport infrastructure system as this can represent a key factor in attracting (and retaining) skilled labour to the region both in terms of the overall amenity of public spaces and for leisure, education and work mobility purposes. This should be reflected."
- E. "The RSES identifies that there are significant gaps in the quality of the transport network across the region, which require prioritised investment to bring it up to a comparable standard with the rest of the country and this should be highlighted within the narrative."
- F. "That meaningful effect is given to the suite of RPOs within the RSES, in particular those within Growth Ambition 3 of the RSES see also under 'Additional Recommendations'"

Opinion

- A. DA-56 refers to "NWRA Regional Spatial and Economic Strategy 2020", which is obviously the superseding successor of the "Border Regional Planning Guidelines 2010".
- B. The RPOs included under Growth Ambition 3 (Connectivity Connected Region) are either high-level/aspirational or very specific, even to project level. All relevant RPOs specific to County Sligo have been incorporated in the Draft Variation. The high-level RPOs will be taken into consideration when reviewing transport policy as part of the preparation of the next CDP 2023-2029.

The text on p. 222-223 of the RSES relates to the rail network and includes the following statement in relation to the Western Rail Corridor:

"In line with the National Development Plan, an independent review will be undertaken immediately and if the review concludes that the corridor should be reopened, and if that is approved by Government, the project should be prioritised during this plan period".

RPO 6.11 seeks "the commencement and completion of the review of the Western Rail Corridor project as a priority for passenger and freight transport.

RPO 6.13 seeks to (a) "deliver the Athenry-Tuam-Sligo Rail", and (b) progress through pre-appraisal and early planning the extension of the railway from Athenry-Tuam-Claremorris-Sligo".

The Department of Transport, Tourism and Sport (DTTAS), in its submission of 20 August 2020, has indicated the following:

The position in relation to the review of the Western Rail Corridor (WRC) is that larnród Éireann commissioned a financial and economic appraisal of a proposed reopening of Phases 2 and 3 of the WRC and, in late 2019, submitted a draft copy of that appraisal to the Department. In recent weeks a final copy of the report has since been received.

As was signaled publicly at the time of the commissioning of the appraisal, and as is required under the Public Spending Code (PSC), the Department has been reviewing the documentation that has been received and engaging with larnród Éireann and the consultants as required during this review. Once that review is complete the matter will then be brought to Government for its decision and the report published as soon as practical thereafter.

Neither the NWRA nor the DTTAS submission highlights any inconsistency between the provisions of the Sligo CDP and those of the RSES with regard to the Western Rail Corridor.

However, it is acknowledged that it will be necessary to update the narrative, policies and objectives contained in Section 8.4.2 of the CDP (which relates to the rail network) as part of preparation of the next CDP 2023-2029 in consultation with all relevant stakeholders, upon completion of the above-mentioned report and the issuing of the Government's decision.

- C. Policy P-PT-5 relates to the Western Rail Corridor. This policy will be reviewed and updated as part of preparation of the next CDP 2023-2029 in consultation with all relevant stakeholders, based on the above-mentioned report and the Government's decision.
- D. The narrative in Chapter 8 (Transport) of the CDP will be updated as part of preparation of the next CDP 2023-2029 in consultation with all relevant stakeholders.
- E. As above.
- F. The RPOs included under Growth Ambition 3 (Connectivity Connected Region) are either highlevel/aspirational or very specific, even to project level.

All relevant RPOs specific to County Sligo have been incorporated in the Draft Variation. The highlevel RPOs will be taken into consideration when reviewing economic development and transport policy as part of the preparation of the next CDP 2023-2029.

Recommendation

No change to the Draft Variation is required in respect of Issue no. 21.

Issue no. 22 (NWRA additional recommendations)

"That meaningful effect is given to the suite of RPOs within the RSES, in particular but not be limited to the following:

1. RPO 5.3 Zone of North Sligo / North Leitrim (Belbulbin and its hinterland) as a potential National Park / National Recreation area

- 2. RPO 6.4 Smart Ports
- 3. RPO 6.17 Rail Electrification
- 4. RPO 6.18 Smart Technology
- 5. RPO 6.20-22 Bus Services Network Review.
- 6. RPO 6.23, 6.26, 6.27, 6.28 Local Transport Plans
- 7. RPO 6.41-60 Smart Technology.
- 8. RPO 7.1- 7.6 Education/Skills- including support for Technological University.
- 9. RPO 7.8 Slainte Care.
- 10. RPO 7.11 Healthy Ireland.
- 11. RPO 7.14 Specific designation of lands for nursing homes and sheltered housing.
- 12. RPO 8.2 Support Electricity Transmission Projects in Sligo (North West Project).
- 13. RPO 8.5 and 8.6 Gas Networks and Natural Gas.

- 14. RPO 8.8 Support for implementation of CURWMP.
- 15. RPO 8.15 and 8.17 Water Infrastructure projects

Opinion

The RPOs included in the RSES are either high-level/aspirational or very specific, even to project level. All relevant RPOs specific to County Sligo have been incorporated in the Draft Variation. The high-level RPOs will be taken into consideration as part of the preparation of the next CDP 2023-2029.

Recommendation

No change to the Draft Variation is required in respect of Issue no. 22.

Submission no. 10

Suzanne Dempsey, Spatial Planning Lead (Asset Strategy & Sustainability) on behalf of Irish Water (IW)

Issue no. 1

IW informs that the Capital Investment Plan 2020-2024 has been approved by the Commission of the Regulation of Utilities (CRU).

Opinion

Noted.

Recommendation

No change to the Draft Variation is required.

Issue no. 2

Irish Water indicates its availability to assist Sligo County Council in "identifying suitable zoned lands from a water services perspective in future local area plans etc., as per Appendix 3 and NPO 72 of the National Planning Framework". IW encourages sequential development in areas with existing infrastructure and spare capacity.

The recently-issued "wastewater treatment capacity register" for Sligo shows that wastewater treatment plants (WWTPs) in the County have ample capacity to accommodate projected growth over the Development Plan period, if ongoing and near-completion projects are taken into consideration. Further WWTP upgrades may also be progressed in smaller settlements following decisions on investment due in Q1 2021.

A Network Development Plan will be carried out for Sligo town in 2021, "to help inform how undeveloped zoned sites in the town could be serviced". While there are potential bottlenecks in areas of Sligo town, there are no major wastewater network constraints in other settlements in the County.

Opinion

The updates on investment plans and information on forthcoming projects are noted. Sligo County Council will work with Irish Water to identify serviceable lands as part of the preparation of the forthcoming Sligo and Environs LAP, future Sligo CDP 2023-2029 and subsequent LAP reviews.

Recommendation

No change to the Draft Variation is required.

Issue no. 3

With regard to water supply, the submission states that "subject to the necessary upgrades being carried out, there is adequate capacity to meet the planned increases in population to 2023".

It is also anticipated that there will be adequate capacity to meet the projected 3,200 increase in Sligo City's population over the period 2016-2023.

In the longer term, a further upgrade at Foxes Dens Water Treatment Plant may be required to accommodate a population increase of 8,000 by 2040.

The submission contains further details on current and planned water supply works in the County, including mains rehabilitation and new water mains (e.g. along the new Western Distributor Road).

Opinion

The updates and information are noted. Sligo County Council will work with Irish Water to identify serviceable lands as part of the preparation of the forthcoming Sligo and Environs LAP, future Sligo CDP 2023-2029 and subsequent LAP reviews.

Recommendation

No change to the Draft Variation is required.

Submission no. 11

Anne Marie O'Connor, Deputy Regulator and Director of Plans Evaluations on behalf of the Office of the Planning Regulator

The Office of the Planning Regulator is mandated by Section 31AM of the Planning and Development Act 2000 (as amended) to evaluate and assess development plans and variations of development plans in the context of statutory parameters such as:

- Matters generally to be contained in a development plan (section 10) and, in particular, section 10(2)(n) in relation to climate change;
- Consistency with the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy for the Northern and Western Region (RSES);
- Ministerial guidelines issued under section 28;
- Ministerial policy directives issued under section 29, and,
- Such other legislative and policy matters as the Minister may communicate to the Office in writing.

The submission is structured under the above headings. It includes seven **observations** and one **recommendation**.

The context of the observations and recommendation is summarised as "issues" below. The full text of the recommendation/observation is included, followed by the Chief Executive's comments/opinion and recommendation regarding changes to the Draft Variation.

Issue no. 1 (OPR's Observation 1)

A. The OPR notes that in the Draft Amendment No. 28, the apportionment of the population growth (as envisaged by NPF Implementation Roadmap projections and RSES targets between 2016 and 2026) to the life of the Development Plan was based on an 11-year period.

It is suggested that the period from 2016 to 2026 should be considered to be ten years, not eleven. Accordingly, the apportionment should be seven years out of ten, instead of eight years out of eleven.

The corresponding yearly population increase should be 700 persons instead of 636 for the County, for a total of 4,900 persons by the end of the plan period, in 2023.

- **B.** The OPR also notes that Sligo County Council is availing of the maximum 25% headroom available in respect of the projected County population, but does not avail of the same headroom in relation to Sligo Town and Environs.
- **C.** With regard to Table 3.1 (summary of past and envisaged population distribution), the OPR notes that the population projections for Sligo and Environs and for rural areas have been adjusted downwards, to "largely account for the revised RSES target", but no adjustments have been made in respect of the key support towns and villages.

It is suggested that population allocation should be revisited in the context of the County's overall future growth and in relation to policy objectives in the NPF and RSES.

The OPR emphasises that "the quantum of growth allocated to the key support towns (22-25% uplift) and smaller settlements, relative to their baseline population may need to be revisited in the context of the county's overall future growth and in relation to policy objectives in the NPF and RSES".

It is also advised that "additional commentary" should be included to set out the "planning rationale for the approach to the augmented population targets brought about by the RSES, including an explanation as to how changes are distributed across the settlement hierarchy" as set out in Table 3.1.

D. Revisions should be made to Table 3.1 to "regularise internal inconsistencies in relation to the cumulative population projections for the key support towns".

Opinion

- A. Noted and agreed. The figures will be revised as suggested, both for Sligo RGC and for the County. The Draft Amendments DA-28, DA-29, DA-32, DA-33, DA-34 and DA-35 should be modified to reflect the revised figures.
- **B.** Having regard to the past and current economic environment, and to the lack of development in the Sligo Town and Environs area, the apportioned RSES target population for 2023, i.e. 3,080 persons in addition to the 2016 population, appeared to be optimistic.

However, the Council welcomes the OPR's suggestion for applying a 25% headroom to the target population for Sligo and Environs. This will ensure that, when economic growth returns, there will be sufficient provision for suitably zoned and serviced land to cater for the desired population increase.

C. It should be noted that the NPF and RSES did not bring about an <u>augmented</u> population target for County Sligo as a whole. On the contrary, even after applying the 25% headroom recommended in the NPF Implementation Roadmap, the 2023 County population (71,660) would still be <u>lower</u> than previously envisaged by the RPGs (77,350).

Similarly, the application of the 25% headroom would result in a <u>lower</u> target population (23,050) for Sligo Town than that provided for in the RPGs (23,700).

The initial CDP-recommended population for Ballymote, Enniscrone and 32 villages is largely correlated with the existing residential/mixed-use zoning in the respective LAPs and Mini-Plans. Such zoning is not proposed to be changed as part of this Variation.

In the absence of up-to-date demographics, any attempt to review population allocations for the lowertier settlements in the hierarchy would be unrealistic.

The future population allocation in the County will be addressed as part of the preparation of the next CDP 2023-2029, based on demographic data collected in the Census of 2021.

At the same time, it is considered reasonable to apply a 21% "headroom" to Tobercurry's base population (as recorded in Census 2016), in line with the allocations already in place for Ballymote (22%) and Enniscrone (25%). The adjusted 2023 recommended population level for Tobercurry should be 2,400 instead of the current 2,000.

D. Noted and agreed. The inconsistent figures in Table 3.1 as amended by DA-29 will be corrected.

Recommendation

Modify the Draft Amendments DA-28, DA-29, DA-32, DA-33, DA-34 and DA-35 to reflect the revised figures in accordance with the OPR (and NWRA) recommendations.

Issue no. 2 (OPR's Observation 2)

In relation to the forthcoming Sligo and Environs LAP, the OPR notes the wording of Draft Amendments 31 and 37 "could give the impression that a LAP may be prepared for a 10-year period from the outset" and indicates that "this is not the case under the legislation".

While the Office welcomes the Council's intention to prepare a "long-term strategic vision for Sligo RGS to 2030" as part of the review of the LECP, it suggests that the amended Core Strategy should refer to a LAP prepared on the basis of a six-year statutory lifespan "rather than the ten-year horizon alluded to".

Opinion

The comments are noted. There is no reference in DA-32 and DA-37 to the adoption of a 10-year LAP in contravention of planning legislation.

However, there is no objection to clarifying that the future Sligo and Environs LAP will cover a sixyears statutory period, while having due regard to the longer-term growth (up to 2031) of the Regional Growth Centre as envisaged in the NPF and RSES.

Recommendation

Insert additional wording in DA-32 and DA-37 to clarify that the next Sligo and Environs LAP will be prepared on the basis of a six-years statutory lifespan, with due regard given to the longer-term growth (up to 2031) of the Regional Growth Centre as envisaged in the NPF and RSES.

Issue no. 3 (OPR's Recommendation 1)

In relation to the Core Strategy Tables A (Sligo and Environs) and B (remaining County settlements), the OPR questions the assumptions regarding average household sizes and residential densities used in calculating the housing land requirements for the County's towns and villages.

The Office recommends that the Core Strategy table be modified to:

- ensure that the density assumptions used to calculate the housing and land requirements for the plan period are consistent with requirements of 10(2A), Guidance Notes and the Sustainable Urban Development Guidelines (2009).
- indicate the quantum in hectares of proposed zoned land for Mixed Use for each settlement, including broad estimates for housing yield that may arise from the redevelopment or infill of these areas. Refer to page 6 of the Guidance Note on Core Strategies.
- set out a high-level framework for amendments to lower-level plans.
- reflect the format of the illustrative example of a core strategy table as outlined in the Appendix 2 of the Guidance Note.

Opinion

The recommendation is noted and agreed. The Core Strategy Table B should be modified and expanded to reflect the format and include the information specified in the 2010 *Guidance Notes on Core Strategies*.

The modified Table B should be accompanied by explicit assumptions, rationale and explanatory notes in relation to the population and housing land figures.

Corresponding modifications should also be made to the Core Strategy Table A (Sligo and Environs).

Recommendations

A. In the Draft Amendment No. 35, expand and modify the Core Strategy Table B as indicated above and add a text section containing assumptions, rationale and explanatory notes in relation to the population and housing land figures.

B. In the Draft Amendment No. 34, modify the Core Strategy Table A (Sligo and Environs) to correspond with the modified Core Strategy Table B (DA-35).

Issue no. 4 (OPR's Observation 3)

The OPR requests clarifications regarding "the basis for using an average household size of 2 (county) and 2.2 (Sligo) and its consistency with the NPF".

Opinion

Section **5.7 Housing** of the National Planning Framework, under the sub-heading **Need and Demand Profile** (p. 88 of the NPF), specifies that:

Between 2017 and 2040, approximately 25,000 new homes will need to be provided in Ireland every year to meet people's needs for well-located and affordable housing, with <u>increasing</u> <u>demand to cater for one and two person households</u>.

Note 20 in Appendix 3 (p. 151 of the NPF), referring to the figure of 550,000 housing units projected to 2040 (Table 5.1 on p. 88 of the NPF) states that "This figure broadly reflects the overall housing requirement to 2040 related to an additional population of one million people based on a household occupancy rate of 2.5 taking account of obsolescence;"

It is considered that a "household occupancy rate" of 2.5 relates to the occupancy of housing units, **NOT** to the average household size of newly-formed households in need of accommodation.

Under the sub-heading Changing Family Size (p. 88 of the NPF), it is indicated that:

<u>Household size continues to decline</u>. Currently, 7 out 10 households in the state consist of three people or less. Household sizes in urban areas tend to be smaller than in the suburbs or rural parts of the country.

Having regard to the above indications found in the NPF and to the observations and experience of Sligo County Council's Planning staff, the following assumptions have been used in calculating the housing land requirement shown in the Core Strategy Table B (as modified):

Assumptions regarding average household sizes

- A-1. Empirical evidence obtained through pre-planning meetings indicates that the households most likely to seek new family homes in County Sligo usually consist of a young couple and at most one child (or no child). Therefore, the average household size for calculating the housing requirements of additional population, assumed to be composed mainly of newly-formed households, has been set at 2.2 persons.
- A-2. The above average household size has been decreased to 2 persons for the Sligo and Environs area, where there is a growing housing demand from one-person households, mostly older people living alone. This demographic segment is growing faster in the Sligo and Environs area than in other parts of the County.

Recommendation

The Chief Executive's recommendation in relation to Issue 3 above already provides for DA-35 to include an additional text section containing assumptions regarding future average household size in the County and in the Sligo and Environs area. No further modifications are required on foot of this OPR observation.

Issue no. 5 (OPR's Observation 4)

The OPR "considers that there is greater scope to improve the alignment between this plan and higher level plans, NPF and RSES, through the terminology associated with the designations in the settlement hierarchy and within the plan generally" in the following manner:

- A. The submission states that "The references to Sligo as a city might create confusion about its status as a Regional Centre in the NPF"
- B. "An alternative term could be used for the 'key support towns' in the settlement hierarchy, so as to avoid confusion with the designated 'Key Towns' in the RSES which are targeted for population uplift of 30%".
- **C.** "Furthermore, the references to the Sligo sub-region area could be perceived to conflict with the NWRA area, sub-regions".

Opinion

A. "Sligo City" has been in use for 20 years without being seen as inconsistent with national and regional planning policy. The term "City" has been chosen by the Members and the Executive of Sligo County Council to reflect the local community's vision and growth ambitions. The name "Sligo City" appears in the Local Authority's corporate and sectoral plans and strategies.

The term is "Sligo City" is used in relation to the existing urban area of Sligo and Environs. This is not the same as the Regional Growth Centre area, a virtual entity which includes 3 of Sligo City's satellite villages and the surrounding rural area.

The references to "Sligo City" in the CDP are not considered capable of generating any confusion with the RGC.

- **B.** The designation "Key Support Towns" for Ballymote, Enniscrone and Tobercurry was adopted by the Council in 2005, 15 years before the publication of the RSES. It is considered that County Sligo's Key Support Towns cannot be mistaken for the RSES-designated Key Towns, particularly in the Sligo CDP, where there is no reference to regional Key Towns.
- **C.** The term "Sligo Subregion", initially adopted in the CDP 2005-2011, appears in Section 3.2.2 of the current CDP and describes the near hinterland of Sligo City, which coincides with the designated "rural area under strong urban influence".

There is indeed scope for confusion, as **Figure 2 Map of the Northern & Western Regional Assembly Sub-Regions** on p. 3 of the RSES shows an area larger than County Sligo labeled "Sligo & Environs" (not "Sub-Region")!

The usefulness of the term "Sligo Subregion", as well as the opportunity of retaining or changing the designations of towns and villages in the Settlement Hierarchy will be considered as part of the preparation of the next CDP 2023-2029.

Recommendation

No change to the Draft Variation is required in respect of Issue no. 5.

Issue no. 6 (OPR's Observation 5)

The OPR understands that a level of referencing to the historic documents (such as the National Spatial Strategy and the Regional Planning Guidelines) may be necessary to highlight evolution in policy and provide a background context.

However, the Office "considers that there is greater scope through this variation to scale back on the narrative and referencing to the preceding higher level plans, NSS and Border RPG, which have been replaced by the NPF and RSES".

Opinion

The Draft Variation is designed to implement the main policy changes introduced by the NPF and the RSES. It is considered useful to retain the references to previous NSS and RPG provisions, to help the reader understand the nature and quantum of change proposed to the CDP under the Draft Variation. References to NSS and RPGs will be scaled back substantially as part of the preparation of the next CDP 2023-2029.

Recommendation

No change to the Draft Variation is required in respect of Issue no. 6.

Issue no. 7 (OPR's Observation 6)

The OPR advises Sligo County Council to "reflect on the scope of the settlement hierarchy to better reflect the diversity in the settlement types across the county which in itself includes several subcharacter areas including: RGCSP area, the areas under urban influence, the rural areas in need of regeneration and to re-examine the rural settlements in the context of their differing scales, sizes and socio-economic functions within the county. The core strategy map should also be refined to visually reinforce the RGSCP area, character areas and settlements within the county and the overall vision for the county".

Opinion

The opportunity of reviewing the designations of towns and villages in the Settlement Hierarchy and those of rural areas will be considered as part of the preparation of the next CDP 2023-029.

The Core Strategy Map associated with the next CDP will include the boundaries of the RSESdesignated Regional Growth Centre.

Recommendation

No change to the Draft Variation is required in respect of Issue no. 7.

Issue no. 8 (OPR's Observation 7)

A. The OPR advises that "In order to further enhance the alignment between the Sligo County Development Plan and the NWRA RSES, the planning authority should include a specific policy in the plan to underscore and support RPO 6.27 of the RSES in relation to the preparation of a Local Transport Plan for Sligo Regional Growth Centre". This observation relates to Draft Amendments 54 to 56, which are welcomed by the Office. B. "Furthermore, a policy objective to support the preparation of a local area plan for Sligo (section 3.5.1/ amendment no. 37) should be included and clarify that the local area plan will be informed by a Local Transport Plan prepared in consultation with the National Transport Authority and Transport Infrastructure Ireland".

Opinion

A. The RPO 6.27 indicates the NWRA's support for "the preparation of Local Transport Plans led by local authorities in conjunction with the NTA and other stakeholders, based on Area Based Transport Assessment (ABTA) guidance and alignment with environmental policy, for Athlone, Letterkenny, Sligo Town, Cavan Town, Monaghan Town ... (etc.)".

There is no reference to a LTP for the entire Sligo Regional Growth Centre area. It is considered that a specific objective to prepare a LTP for Sligo Town should be included in the forthcoming Sligo and Environs Local Area Plan.

However, there is no objection to the inclusion of a statement indicating the RSES' support for the preparation of this LTP at the end of the Draft Amendment No. 56.

B. The preparation of a local area plan for Sligo and Environs commenced in 2017. Pre-draft consultation took place from 12 December 2017 to 30 January 2018. The process was interrupted by the publication of the NPF and by the delayed publication of the RSES.

It is not considered necessary to include a specific objective to prepare a LAP for Sligo and Environs, because this process has been ongoing for nearly three years.

However, there is no objection to the inclusion in DA-37 of a reference to the RSES-supported LTP for Sligo Town, in accordance with RPO 6.27.

Recommendations

A. In the Draft Amendment No. 56, include a statement indicating the RSES' support for the preparation of a Local Transport Plan for Sligo Town, as expressed in RPO 6.27.

B. In the Draft Amendment No. 37, include a reference to the preparation of a LTP for Sligo Town, as provided in the RSES' RPO 6.27.

3. Proposed modifications to the Draft Variation No. 1 in accordance with the Chief Executive's recommendations

The **Draft Variation No. 1** document put forward 56 Draft Amendments to five chapters of the Sligo County Development Plan 2017-2023 where changes were warranted on foot of the NPF and RSES.

This section contains only those Draft Amendments where modifications have been recommended by the Chief Executive in response to issues raised in the submissions made by the NWRA and the OPR.

The following pages should be read in conjunction with Draft Variation No. 1 (as published on 27 July 2020) and with Volume 1 of the Sligo County Development Plan 2017–2023.

In the Draft Variation document, text to be deleted was shown **in red like this**, while text to be inserted was **shown in blue like this**. This colour coding is retained.

In addition, the Chief Executive's recommended modifications to the text **are shown in green like this.**

Strategic Environmental Assessment (SEA) - Screening

The SEA Screening Report prepared in conjunction with the Draft Variation concluded that there would be no significant effects on the environment as a result of the proposed Variation. All the modifications recommended by the Chief Executive are not of a material nature and, if adopted, would not change the conclusion of the initial SEA screening.

Appropriate Assessment (AA)

A screening for Appropriate Assessment pursuant to Article 6 of the EU Habitats Directive 92/43/EEC has been carried out by Sligo County Council's Heritage Officer. The conclusion of this report indicates that the Variation will have no significant effects on any Natura 2000 site. As indicated above, the modifications recommended by the Chief Executive are not of a material nature and, if adopted, would not change the conclusion of the initial AA screening.

Modifications to Draft Amendments to Chapter 1 of the CDP

Draft Amendment No. 3

In Section 1.1(1), delete the text in red and insert the text in blue and modifications in green as follows:

At **national** level:

1. The NSS, Ireland's first national strategic planning framework, identified Sligo as an urban centre to be developed in an accelerated manner as a Gateway City to drive the overall development of the North-West.

The National Planning Framework (NPF), which replaced the NSS, did not retain the Gateway designation for Sligo City, but recognised it as a Regional Centre and highlighted it as being a growth driver to a greater extent than any other towns in the North-West.

The NPF is a document that will guide, at a high level, strategic planning and development for the country over 20+ years, so that as the population grows, that growth is sustainable in economic, social and environmental terms.

The National Policy Objective 2b specifies that the regional role of Sligo "will be identified and supported in the relevant Regional Spatial and Economic Strategy".

This County Development Plan, like its predecessors, promotes growth in the Gateway City of Sligo City while seeking to achieve balanced development in all County areas outside gateway.

The NSS is due to be replaced by a statutory National Planning Framework (NPF) in 2017. It is expected that the NPF will retain the Gateway designations and will continue to promote balanced development of the national territory, taking into account the diverse characteristics of urban and rural areas.

In Section 1.1(2), delete the text in red and insert the text in blue and modifications in green as follows:

At regional level:

2. The Border RPGs 2010 aimed to support the development of the Gateways identified in the NSS within a more detailed framework that included Hubs and other key towns outside the Gateways.

The Guidelines established a broad framework for county development plans to ensure that the development of the Gateways under the NSS moved forward in tandem with a process of strengthening other urban areas and supporting a dynamic rural community.

The RPGs also set minimum population targets and related housing land requirements for counties and major urban centres in the Border Region up to the year 2022. The Core Strategy of this County Development Plan takes full account of the RPG population targets.

The Border Regional Planning Guidelines are due to be replaced in 2017 by a Regional Spatial and Economic Strategy prepared by the Northern and Western Regional Assembly.

The 2020 *Regional Spatial and Economic Strategy for the Northern and Western Region* (RSES) has replaced the 2010 Regional Planning Guidelines.

The RSES relates to a much larger area than the RPGs for the Border Region, as a result of the 2015 "streamlining" restructuring of Regional Assemblies.

The 12-year Strategy "provides a high-level development framework for the Northern and Western Region that supports the implementation of the National Planning Framework (NPF) and the relevant economic policies and objectives of Government". It is intended to deliver "effective regional development" for the entire region, embracing the development opportunities specific to each sub-region.

The RSES identifies Sligo City as an "urban place of regional scale" and designates it a *Regional Growth Centre*. This is a significant position in the Region's settlement hierarchy, second only to Galway City's Metropolitan Area designation and on the same level as Letterkenny and Athlone Regional Growth Centres.

The Regional Strategy envisages at least a 40% increase in Sligo City's population by 2040, equivalent to circa 8,000 additional residents, giving a total of 26,000 people. Intermediate "targets" are set for 2026 (+4,400 persons) and 2031 (+2,200).

The Regional Policy Objective RPO 3.1 indicates the Regional Assembly's intention to develop urban places of regional scale through compact growth in Metropolitan and Regional Growth Centres, such as Sligo.

The RSES includes a Regional Growth Centre Strategic Plan for Sligo, which sets out broad development goals and specific regional policy objectives.

In Section 1.1(3), delete the text in red and insert the text in blue and modifications in green as follows:

At local level:

3. The first Local Economic and Community Plan for County Sligo was prepared by Sligo County Council and the Local Community Development Committee during 2015 and adopted in January 2016. The LECP sets a vision, goals, objectives and detailed actions designed to mobilise all stakeholders with an interest in a successful future for Sligo.

Generating employment and stimulating economic activity emerged as the highest priority of the LECP, with complementary goals relating to quality of life and a culture of inclusion seeking to reduce poverty and deprivation. Such goals are reflected in relevant chapters of this County Development Plan.

4. The Sligo and Environs Development Plan 2010-2016 represents a detailed development framework to transform Sligo into a Gateway City, as outlined in the NSS. Jointly prepared by Sligo Borough and County Councils, the SEDP was incorporated in 2014 into the CDP 2011-2017, following the merging of Sligo's planning authorities.

The Core Strategy of this County Development Plan reflects the strategic goals of the SEDP and provides for the preparation of a local area plan for Sligo and Environs as a detailed policy document directing the growth of the Gateway Regional Growth Centre.

Modifications to Draft Amendments to Chapter 3 of the CDP

Draft Amendment No. 11

In the introductory section to **Chapter 3 Core Strategy**, insert the text in blue and modifications in green as follows:

3. County Sligo: Core Strategy

Sligo was designated as a Gateway City in 2002, under the National Spatial Strategy (NSS), which aimed to achieve a balanced social, physical and economic development across the state. Within this context, Sligo was recognised as having the potential to build scale and critical mass to drive development in the North-West.

In the absence of substantial investment in critical infrastructure, partly due to the economic crisis, Sligo has not yet achieved its potential in terms of economic development and population growth. Despite the difficulties, Sligo County Council remains determined to drive the development of the City and County towards the vision originally set out in the NSS.

In July 2014, Sligo County Council, working with Sligo Local Community Development Committee, embarked on an extensive research and consultation process to identify Sligo's key challenges, opportunities and priorities from both a community and economic perspective. The outcome of that process was Sligo's first Local Economic and Community Plan (LECP), which set a vision, goals, objectives and detailed actions designed to mobilise all stakeholders with an interest in a successful future for Sligo.

It is acknowledged that many of the major issues affecting the County's development are contingent on national policy and government funding. The LECP focuses on what can be achieved locally by working together to bring about a higher quality of life and more sustainable economic development in Sligo.

The LECP and the County Development Plan are complementary policy documents, which share the same **vision** (see below) for the County's future.

Overarching Vision

County Sligo will be an enterprising, creative, inclusive and resilient place, which values and celebrates its unique environment, rich culture and heritage, and where the wellbeing of current and future generations is central to everything we do.

Realising this vision involves the promotion of development in the Gateway City of Sligo, the creation of compact, attractive towns and villages, in a green and accessible County, which offers affordable homes, healthcare, educational, cultural and recreational facilities set in a high-quality natural environment where heritage is protected and enhanced.

The 2018 National Planning Framework (NPF) recognises Sligo's potential to serve the North-West as an accessible centre of employment and services, which can be a focal point for investment and have the widest possible regional influence.

The 2020 Regional Spatial and Economic Strategy (RSES) formally identifies Sligo as a Regional Growth Centre (RGC), capable of leading the development of the surrounding region.

The RSES includes a Strategic Plan for the Sligo RGC, which sets out the vision and the strategic goals and objectives designed to achieve that vision.

Apart from the Sligo RGC Strategic Plan, the RSES contains a range of regional planning objectives (RPOs), of which the most RPOs which are relevant to the future development of County Sligo have been incorporated (as amendments) in the Core Strategy, as well as in Chapters 4 (Economic Development) and 5 Housing) of this Plan.

Sligo County Council remains determined to drive the development of the Sligo Regional Growth Centre and County towards the vision set out in the NPF and RSES.

All the policies and objectives for development contained in Volume 1 and Volume 2 of this Plan are subject to compliance with the requirements of the Habitats Directive and, where relevant, those of the Birds Directive, EIA directive and relevant national legislation.

Draft Amendment No. 14

In Section 3.1.2 Consistency with NSS and RPGs, delete the text in red and insert the text in blue and modifications in green as follows:

3.1.2 Consistency with NSS and RPGs the NPF and RSES

A. Consistency with the National Planning Framework

Having identified Sligo as one of four new gateways in 2002, the NSS emphasised the role of balanced development at local level, which must be achieved through the strengthening of the urban settlement structure in parallel with ensuring that the resources of rural areas are developed to offer a viable future to rural dwellers.

The 2018 NPF recognises that Sligo, as a regional centre, "serves a large hinterland that extends beyond County Sligo into surrounding counties, to include parts of Donegal, Leitrim, Mayo and Roscommon, supported in particular by nearby county towns. Sligo's significance as a centre of employment and services is much greater than its scale in terms of population".

The NPF indicates that "it will be necessary to prepare a co-ordinated strategy for Sligo at both regional and town level to ensure that the Town can grow sustainably and secure investment as a key

regional centre". This recommendation is reiterated in the National Policy Objective 7, which provides, inter alia, for the strengthening of Ireland's urban structure, particularly in the Northern and Western Regions, to include the regional centre of Sligo.

The NPF is underpinned by the National Development Plan 2018-2027 (NDP), which sets out investment priorities totalling circa €116 billion.

Draft Amendment No. 15

In Section 3.1.2 Consistency with NSS and RPGs, delete the text in red and insert the text in blue and modifications in green as follows:

B. Consistency with the RSES

The 2010 Border Regional Planning Guidelines (RPGs) proposed a polycentric settlement model, supported by a strong road network. The RPGs recommended the prioritisation of key urban settlements in terms of population and investment growth, while at the same time sustaining and revitalising rural areas.

The 2020 RSES identify twelve "Urban Places of Regional Scale", where growth should be accelerated. Among these, Sligo City is designated as a Regional Growth Centre, with a targeted population growth of at least 40% by 2040 (S. 3.4 Urban places, p. 34 of the RSES).

The RSES also seeks to promote the vitality and viability of smaller towns, villages and rural areas.

Regional Policy Objectives RPO 3.2 (b and c), RPO 3.3 and RPO 3.4 specifically support Sligo's population growth, seeking to direct it within existing settlements' built-up footprints and partially on brownfield sites in urban and rural areas.

In accordance with the above concepts, this **Core Strategy** prioritises growth in the **Gateway City** of Sligo Regional Growth Centre and consolidation of the County's main towns, while seeking to support rural areas mainly by strengthening a range of small villages throughout the County.

Insert a new Section 3.1.4 as follows, including the modifications shown in green:

3.1.4 NPF (Implementation Roadmap) population projections

	Pop. 2016 (census)	Pop. 2026 (projected)	Pop. 2031 (projected)
State	4,761,865	5,399,256	5,683,670
NWRA	847,442	942,500–961,500	986,500 - 1,014,500
North-West (Sligo, Leitrim, Donegal)	265,000	280-284,500	289,500 - 296,000
Donegal	159,000	173,500 - 176,500	179,500 - 183,500
County Sligo	65,500	71,500–72,500	74,000–75,500
Leitrim	32,000	35,000 - 35,500	36,000 - 37,000

The NPF Implementation Roadmap includes the following population projections for County Sligo:

The Roadmap specifies that "The published NPF/NDP national average baseline population projection accounts for a 25% 'headroom' allowance for additional population growth in every County pro-rata, for each Census year and related intercensal period".

The document also notes that "planning authorities have generally made provision for 50% more zoned land than is required to meet demand during the six-year lifetime of a Development Plan i.e. sufficient land for a further three years."

This means that "there is limited further requirement for 'headroom' for population growth to be incorporated into statutory Development Plans in most cases."

At the same time, up to 25% headroom "can be considered to 2026 in counties where population is projected to be at or above the national average baseline". The Roadmap includes County Sligo in this category.

Draft Amendment No. 21

In Section 3.2.1 Gateway focus, delete the text in red and insert the text in blue, modifications in green and new Fig. 3.B as follows:

3.2.1 Gateway focus

At the core of the Settlement Hierarchy is the development of **Sligo Gateway** as envisaged by the National Spatial Strategy, i.e. a nationally significant urban centre, whose location and scale support the desired critical mass necessary to sustain strong levels of economic growth and prosperity in the North-West, and reinforce its links with Gateways and Hubs in neighbouring counties.

Sligo City, as intended for the purposes of the RPG allocations, is equivalent to Sligo and Environs as per Census boundaries, i.e. the three Electoral Divisions of Sligo North, Sligo East and Sligo West plus the urban extensions outside these EDs.

The Gateway area is defined in this County Development Plan as Sligo City together with the surrounding area consisting of twelve Electoral Divisions in the city's proximity (Ballintogher East; Ballintogher West; Ballysadare East; Calry; Carney; Collooney; Drumcliff East; Drumcliff West; Glencar; Kilmacowen; Knockaree; Lissadill East – refer to Fig. 1.C in Chapter 1). The Gateway area includes the satellite villages of Strandhill, Collooney, Ballysadare and the smaller villages of Ballincar, Ballintogher, Ballygawley, Carney and Rosses Point.

This definition reflects the likely extent of the area with the highest proportion of residents commuting daily to Sligo for work, education or shopping.

The population of the twelve EDs increased by over 42% between 1991 and 2016, from 11,933 to 17,020 persons. The population of the three urban EDs (former Sligo Borough) increased by just 1.5% over the same period, from 17,302 to 17,658 persons. The 2016 Census figure was slightly lower, at 17,439 persons. It is evident that the most significant population growth is taking place outside the County's main urban centre, especially in villages and rural areas and much less in the urban Environs of Sligo.

This Gateway definition has been chosen in this Plan for the purpose of monitoring population change on the basis of ED-level data collected by successive Censuses.

3.2.1 Focus on Sligo Regional Growth Centre

At the core of the Settlement Hierarchy is the development of Sligo Regional Growth Centre (RGC) as recommended by the NPF and supported by the RSES.

The Sligo RGC Strategic Plan (Section 3.7 of the RSES) covers Sligo and Environs together with surrounding rural areas. The Strategic Plan area has a population of 28,465 people of which 68% (19,413 persons) reside in Sligo and Environs, the "principal urban area" (PUA).

The boundaries of the Sligo RGCSP are based on the CSO's Small Areas, which were selected to include all major employers and educational institutions in the vicinity of Sligo City, together with its closest satellite villages of Ballysadare, Strandhill and Rosses Point (see Fig. 3.B).

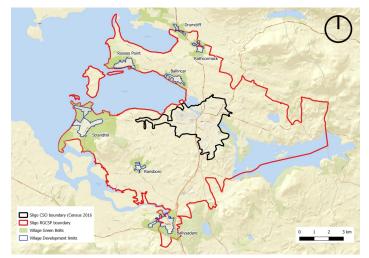


Fig. 3.B Extent of the area covered by the "Regional Growth Centre" designation (source: NWRA RSES, as updated in May 2020)

Recognising that Sligo has the vision and capacity to be a Regional Growth Centre of scale, the Strategic Plan contains **twenty regional policy objectives (RPOs)** grouped under three strategic goals identified as "Compact Growth", "Enterprising Sligo" and "Liveable Sligo".

The Strategic Plan indicates the means to achieve the goals and RPOs, highlights strategic growth areas, regeneration sites and infrastructure, and lists key projects to be delivered over the life of the RSES. The Sligo RGC Strategic Plan will inform the preparation of the Sligo and Environs Local Area Plan.

Appendix J of the Sligo CDP 2017-2023 includes the complete list of RPOs for Sligo Regional Growth Centre, as set out in the RSES.

Draft Amendment No. 22

In Section 3.2.2 Managed growth in the Sligo Subregion, delete the text in red and insert the text in blue and modifications in green as follows:

3.2.2 Managed growth in the Sligo Subregion

In order to support the development of Sligo City Regional Growth Centre, it is essential to control growth not just in the Gateway area but also in the wider Sligo Subregion. This hinterland of the City largely coincides with what the NSS originally described as a 'rural area under strong urban influence' (refer to Section 3.3 Rural settlement).

The Subregion contains thirteen villages, of which five are designated Gateway Satellites Villages.

The Satellite Villages of Ballysadare, Rosses Point and Strandhill are located within the boundaries of the Regional Growth Centre area (refer to Fig. 3.B)

Development in the Subregion needs to be strictly managed and directed into Sligo City, Gateway its satellites and into smaller villages with adequate infrastructure, preserving the rural areas mainly for agriculture and selected tourism and recreation uses.

Draft Amendment No. 28

In Section 3.4.1 Population considerations, delete the text in red and insert the text in blue and modifications in green as follows:

3.4.1 Population considerations

According to Census data, the total population of County Sligo in 2011 was 65,393, of which 19,452 persons lived in Sligo and Environs. Census 2016 counted 65,535 persons.

The RPGs specified population targets for Sligo and Environs (Census area) of 21,200 (in 2016) and 23,700 (in 2022). The remaining County population target was set at 50,651 (in 2016) and 53,650 (in 2022).

The economic downturn of 2008-2014 has encouraged out-migration. Due to this, the County's 2016 population has remained at the same level as in 2011, significantly lower than the RPG target of 71,851 (whole county population). The population of Sligo and Environs area has decreased slightly.

For the purposes of aligning the Core Strategy with the Border Regional Planning Guidelines, the RPG population targets for Sligo City and remaining County area taken to be the additional population envisaged to locate in the Gateway and County between 2016 and 2022. This would mean a **2,500-person increase in Sligo City** and an additional population of **circa 3,000 in the remaining County areas** between 2016 and 2022.

Entire County area

Over the eleven-ten-year period between 2016 and 2026, the County's population is projected to grow by up to 7,000 persons, or 636 700 persons per year on average. The corresponding population increase over the eight seven years from 2016 to 2023 would be circa 5,088 4,900, resulting in a County population of 70,588 70,435 persons by the end of this Plan's lifetime.

Adding the 25% headroom to the **5,088 4,900** projected population increase would result in a potential growth of **6,360 6,125**, leading to a 2023 County population of **71,860 71,660 persons.**

Sligo and Environs area (Sligo City – principal urban area of Sligo RGC)

According to the RSES, over the eleven-ten-year period between 2016 and 2026, Sligo City's population is projected to grow by up to 4,400 persons, or 400 440 persons per year on average. The corresponding population increase over the eight seven years from 2016 to 2023 would be circa 3,200, for a total of 22,400 persons.

Adding a similar 25% headroom to the 3,200 targeted population increase would result in a potential growth of 3,850, leading to a 2023 Sligo City population of 23,050 persons.

In Section 3.4.1 Population considerations, replace the text in Table 3.1 (text in red to be deleted) and insert the text in blue and modifications in green as follows:

Settlement category or area	Pop. 2002	Pop. 2006	Pop. 2011	Pop. 2016	RPG target 2016 or pop. level recommended in CDP 2011-2017	RPG target 2022 or recommended pop. level by 2023
Sligo and Environs (Census boundary)*	19,735	19,402	19,452	19,199	21,200 (RPG), i.e. 2,000 more than in 2010	23,700 (RPG), i.e. 2,500 more than RPG target for 2016
Key Support Towns (combined)	2,820	3,479	4,509	4,691	4,700	5,100
Ballymote	981	1,229	1,539	1,549	1,700	1,900
Enniscrone	668	829	1,223	1,156	1,200	1,450
Tobercurry	1,171	1,421	1,747	1,986	1,800	2,000
Villages	n/a	n/a	n/a	n/a	12,450	14,300
Rural areas	n/a	n/a	n/a	n/a	33,501	34,000
County total	58,200	60,894	65,393	65,535	71,851 (RPG), i.e. 5,421 more than in 2010	77,350 (RPG), i.e. 5,500 more than RPG target for 2016

Table 3.1 Summary of past and envisaged population distribution in County Sligo:
Census 2002, 2006, 2011, 2016 and allocations for 2023

* As the Sligo and Environs boundary has changed in Census 2016, direct comparison is not possible.

Table 3.1Summary of past and envisaged population distribution in County Sligo:
Census 2002, 2006, 2011, 2016 and allocations for 2023, based on NPF and RSES

Settlement category or area	Pop. 2002	Pop. 2006	Pop. 2011	Pop. 2016	RPG target 2022 or initially recommended pop. level by 2023	RSES target or NPF projection or revised CDP-recommended pop. level by 2023
Sligo and Environs (Census boundary)*	19,735	19,402	19,452	19,199	23,700 (RPG), i.e. 2,500 more than RPG target for 2016	23,050 (RSES target + 25% headroom**)
Key Support Towns (combined)	2,820	3,479	4,509	4,691	5,100	5,750
Ballymote	981	1,229	1,539	1,549	1,900	1,900
Enniscrone	668	829	1,223	1,156	1,450	1,450
Tobercurry	1,171	1,421	1,747	1,986	2,000	2,400 (revised)
Villages	n/a	n/a	n/a	n/a	14,300	14,300
Rural areas	n/a	n/a	n/a	n/a	34,000	28,560

Settlement category or area	Pop. 2002	Pop. 2006	Pop. 2011	Pop. 2016	RPG target 2022 or initially recommended pop. level by 2023	RSES target or NPF projection or revised CDP-recommended pop. level by 2023
County total	58,200	60,894	65,393	65,535	77,350 (RPG), i.e. 5,500 more than RPG target for 2016	71,660 (NPF projection with added 25% headroom**)

* As the Sligo and Environs boundary has changed in Census 2016, direct comparison is not possible.

** Refer to Section 3.1.4 which explains the additional 25% headroom.

Draft Amendment No. 32

In Section 3.4.4 Sligo and Environs area, delete the text in red and insert the text in blue and modifications in green as follows:

3.4.4 Sligo and Environs area

For Sligo and Environs, the RPGs recommended that 40 ha of greenfield land be zoned for residential uses, to cater for 2,000 additional persons between 2010 and 2016 with a corresponding requirement of 1,000 residential units. The RPGs recommendations were based on an average density of 35 units per hectare in Sligo and Environs, on an average household size of 2 persons, and incorporated 50% over-zoning in accordance with DEHLG's Development Plan Guidelines. Having regard to these parameters, the recommended area should have been 43 ha, as noted in the Variation No. 2 "Core Strategy" of the SEDP (Table 5.I on p. 3 of that document).

The RPG recommendation translated into the retention of 68 ha of land zoned for residential and mixed use, of which a net area of 28.6 ha had residential potential. Over 514 ha of land with residential potential were placed in the Strategic Reserve.

The spatial distribution and ownership of zoned residential land in the SEDP area, combined with a shortage of financing, have not been conducive to development, despite a sustained demand for new houses in the Sligo City area. With the economy recovering, there are indications that house-building activity could restart in Sligo and Environs if there were more choices in terms of location. This could be achieved by releasing housing land from the Strategic Reserve.

When calculating housing land allocations for the period 2017-2023, it is was considered appropriate to apply the same parameters (residential density and household size) as those used in the RPGs for the period 2010-2016.

Applying the average household size of 2 persons, an average residential density of 35 units per hectare and an over-zoning coefficient of 50%, for an additional population of 2,500 (RPG target), the corresponding housing land would amount to circa 53 ha to be zoned in the forthcoming Sligo and Environs Local Area Plan for residential and mixed uses by releasing sites from the Strategic Reserve.

Should the Regional Spatial and Economic Strategy (due to replace the RPGs) make different recommendations, the amount of land to be zoned for housing and mixed uses in Sligo and Environs will be revised accordingly.

Housing land requirements in the forthcoming Sligo and Environs LAP 2021

According to the RSES, over the eleven-ten-year period between 2016 and 2026, Sligo City's population is projected to grow by up to 4,400 persons, or 400 440 persons per year on average. The corresponding population increase over the eight seven years from 2016 to 2023 would be circa 3,850 persons after a 25% headroom is applied, for a total of 23,050 population.

However, the forthcoming Sligo and Environs Local Area Plan, due to be adopted in 2021, should ensure that sufficient housing land will be available to cater for population growth over a 10-year period¹, i.e. up to 2031, in line with the Regional Strategy.

According to the RSES, the targeted additional population from 2016 to 2031 is 6,600 persons.

Regional policy objective RPO 3.2(b) specifies that in Regional Growth Centres such as Sligo, at least 40% of all new housing should be delivered within the existing built-up footprint.

This provision could be is interpreted as a requirement to accommodate 40% of the additional population (2,640 persons) within the existing built-up area of Sligo and Environs, in housing units built on infill and brownfield sites (i.e. within the CSO-defined Census boundary).

The remaining 60% of the 6,600 population increase targeted by 2031, i.e. 3,960 persons, could be accommodated on greenfield lands.

Considering an average household size (for newly-formed households) of 2 persons and a residential density of circa 35 units per hectare, a minimum of 56 ha of greenfield lands would be required to house the additional 3,960 persons mentioned above on greenfield lands outside the current CSO boundary.

If brownfield and infill sites cannot be developed fast enough, or if their capacity proves insufficient to cater for 40% of the target population (2,640 out of 6,600 persons), it may be necessary to release additional land from the current Strategic Land Reserve (SLR).

The maximum amount of land required to house 6,600 persons would be circa 92 hectares (considering a household size of 2 persons and an average residential density of 35 units per hectare).

The Sligo and Environs LAP will be prepared for a statutory period of six years, i.e. from 2021 to 2026. As indicated in the (modified) Core Strategy Table B, the amount of housing land required by 2023 would be approximately 55 ha.

The precise amounts of greenfield lands to be zoned for housing and mixed uses in the forthcoming Sligo and Environs Local Area Plan shall be determined as part of the preparation of the LAP, in consultation with all stakeholders, taking into consideration the availability of infill/brownfield sites, essential infrastructure and the potential for servicing lands during the life of the LAP.

¹ In accordance with S.18 (4) of the Planning and Development Act, a local area plan must indicate the period for which the plan is to remain in force. A LAP may remain in force notwithstanding the variation or review of the development plan affecting the area of the LAP, if there are no conflicting provisions. If a LAP which indicates that it will remain operational for ten years, the elected members must consider whether this is appropriate not more than five years after its adoption. The procedure is detailed in S.19(1)(d-f) of the Planning and Development Act.

In Section 3.4.5 Remaining County area, delete the text in red and insert the text in blue and modifications in green as follows:

3.4.5 Remaining County area

For the remaining County area, the RPGs recommended the zoning of 195 ha of greenfield land for housing, to provide 1,555 new housing units for a population increase of 3,421 between 2010 and 2016. The average household size considered was 2.2 persons and the average residential density was 12 units per hectare.

Due to the fact that no new housing scheme has been was built since between 2011 and 2016, the amount of land zoned for residential uses in mini-plans and local area plans has decreased only slightly (due to small infill developments).

In the beginning of 2016, there were approximately 58 hectares of greenfield land allocated for residential uses in the County's towns (draft and adopted LAPs) and circa 125 hectares zoned for housing in the villages (mini-plans).

Considering an average household size of 2.2 persons and an average density of 12 dwellings per hectare, the total amount of 183 hectares was capable of accommodating 4,831 persons in 2,196 housing units, or - if the 50% overzoning is taken into account -3,220 persons in 1,464 new dwellings. These figures do not include the residential potential of lands zoned for mixed uses.

Having regard to the above, it was considered unnecessary to zone additional land for housing in the current Plan for the period 2017-2023. Several sites have in fact been rezoned due to various reasons, including poor access, peripheral location, potential flood risk and proximity to designated nature conservation sites.

The quantum of land zoned for residential development in the County's towns and villages for the period 2017-2023, outside the Sligo and Environs area, is circa 169 ha, as shown in the Core Strategy Table B (on the following pages).

Housing land requirement based on NPF-revised population projections

Over the eleven-ten-year period between 2016 and 2026, the County's population is projected to grow by up to 7,000 persons, or 636 700 persons per year on average. The corresponding population increase over the eight seven years from 2016 to 2023 would be circa 5,088 4,900, resulting in a County population of 70,588 70,435 persons by the end of this Plan's lifetime.

Adding the 25% headroom to the **5,088 4,900** projected population increase would result in a potential growth of **6,360 6,125**, leading to a 2023 County population of **71,860 71,660 persons (**refer to Section 3.1.4 above, which explains the additional 25% headroom).

Approximately 3,200 3,850 persons of the additional 6,360 6,125 would be housed in the Sligo and Environs area by 2023 (see Section 3.4.4 above), with the remaining population (3,160 2,275) to be accommodated in the County area outside Sligo City.

Considering an average household size (for newly-formed households) of 2.2 persons and a residential density of circa 12 units per hectare, **a minimum of 120-87 hectares of greenfield land** would be required to accommodate the 3,160 2,275 persons mentioned above.

The 2017 Plan retained 169 ha of the overall amount of lands zoned for housing under the 2011 Plan.

Given the short remaining lifetime of this Development Plan (three years, to 2023), the amount of land currently zoned for housing (169 ha) is more than sufficient to cater for the projected population increase.

The major challenge for the County's towns and villages will be to offer better services and quality of life, in order to attract families which would otherwise choose to build in the countryside.

The Core Strategy Tables A and B show the amount of land allocated to residential uses in the Gateway Sligo and Environs and in the rest of the County for the period 2017- up to 2023, together with its housing potential and the number of additional residents that can be accommodated in Sligo City, Key Support Towns and the smaller villages.

It is noted that both RPG NPF and RSES targets for additional population, i.e. 2,500 3,200 3,850 in Sligo City and 3,000 3,160 2,275 in the County towns and villages, can be accommodated by 2023 without major any changes to the residential and mixed-use zoning already in place.

At the end of Section 3.4 Population and housing land, replace the title and text of the Core Strategy Table A (text in red to be deleted) and insert the text in blue and modifications in green as follows:

Core Strategy Table A. Allocated residential zoning, corresponding housing capacity and potential additional population in Sligo City (future LAP)

Gateway City	Undeveloped residential land 2016 (hectares)	Residential zoning allocated to future LAP (including 50% overzoning)	Potential number of dwellings (average density 35 units /ha)	Potential additional population (average household size of 2 persons)	Potential additional population if the 50% overzoning is not taken into account
Sligo and Environs	44 ha*	53 ha**	1,855 units	3,710 persons	2,473 persons

* The existing area includes the residential potential of mixed-use zoned lands

** The allocated area DOES NOT include the residential potential of mixed-use zoned lands

Core Strategy Table A. Allocated residential zoning and corresponding housing capacity needed to accommodate additional population in Sligo and Environs (future LAP) in accordance with RSES targets

Regional Growth Centre	Undeveloped residential land 2016 (hectares)	Residential zoning required for a population increase of 3,850 by 2023	Residential zoning required for a population increase of 6,600 by 2031	Additional number of dwellings by 2023 (average household size of 2 persons)	Additional number of dwellings by 2031 (average household size of 2 persons)
Sligo and Environs	43 ha*	55 ha**	94 ha**	1,925 units	3,300 units

* The existing area includes the residential potential of mixed-use zoned lands

** The allocated area DOES NOT include the residential potential of mixed-use zoned lands. It is calculated using an average housing density of 35 units per hectare and a household size of 2 persons.

At the end of Section 3.4 Population and housing land, replace the title and text of the Core Strategy Table B (text in red to be deleted) and insert the modified Core Strategy Table B in green as follows:

Core Strategy Table B. Proposed residential zoning, corresponding housing capacity and potential additional population in Sligo County, excluding the Gateway

Settlement	Undeveloped residential land 2016 (hectares)	Residential zoning specified in the CDP 2017-2023 (including 50% overzoning)	Potential number of dwellings (average density 12 units /ha)	Potential additional population (average household size of 2.2 persons)	Potential additional population if the 50% overzoning is not taken into account
Key Support Town Ballymote	21.1 ha	21.1 ha	253 units	558 persons	372 persons
Key Support Town Enniscrone	14.1 ha	14.1 ha	169 units	372 persons	248 persons
Key Support Town Tobercurry	n/a *	19.5 ha	234 units	515 persons	343 persons
32 Villages	125 ha	114 ha	1,368 units 3,010 persons		1,987 persons
Total County excluding Gateway City	160.2 ha**	168.7 ha	2,024 units	4,455 persons	2,950 persons

* The Draft LAP prepared in 2015 for Tobercurry zoned 19.5 hectares for multi-unit residential development

** The total zoned area DOES NOT include the allocation for Tobercurry, as the LAP was not adopted.

Please find the modified **Core Strategy Table B**, **together with the associated assumptions**, **rationale and explanatory notes** at the end of **Section 3** (this section) of this report.

In Section 3.5.1 Sligo and Environs, delete the text in red and insert the text in blue and modifications in green as follows:

3.5.1 Sligo and Environs

The Sligo and Environs Development Plan 2010-2016 (SEDP) was incorporated into the Sligo County Development Plan 2011-2017 following the abolition of Sligo Borough Council and the establishment of a single planning authority with jurisdiction over the entire county.

The zoning and objectives contained in the SEDP are incorporated as statutory provisions into this County Development Plan (2017-2023) and shall remain unchanged until the adoption of a local area plan for Sligo and Environs (expected in 2018).

The Sligo and Environs LAP will be prepared for a statutory period of six years, i.e. from 2021 to 2026.

In accordance with recent amendments of the Planning and Development Act 2000, a local area plan may remain in operation for up to ten years after its adoption, subject to the decision of the elected members (procedure specified in Section 19(1)(d-f) of the Act).

Having regard to the status of Sligo as a Regional Growth Centre and to the anticipated investment in urban infrastructure, some of which requires medium- and long-term planning, it is recommended that the Sligo and Environs Local Area Plan be designed to cover a ten-year period, from 2021 to 2031.

Among such medium and long-term provisions, the LAP will include an objective for the preparation of a Local Transport Plan in conjunction with the NTA and all other relevant stakeholders, in accordance with RPO 6.270f the RSES.

Modifications to Draft Amendments to Chapter 5 of the CDP

Draft Amendment No. 50

In Section 5.1 Housing Strategy, delete the text in red and insert the text in blue and modifications in green as follows:

5.1 Housing Strategy

A *County Sligo Housing Strategy 2017–2023* has been prepared in accordance with Part V of the Planning and Development Act 2000 (as amended). The Housing Strategy forms an integral part of the Sligo County Development Plan 2017–2023. The primary purpose of the Strategy is to ensure that the overall supply of housing is sufficient to meet the needs of the existing and future population of Sligo.

The key findings of the 2016 Housing Strategy are as follows:

Census data and identified trends

- House completions in Sligo reached a peak of 2,164 dwellings at the end of 2006 before decreasing rapidly year-on-year to just 167 dwellings by the end of 2015, a fall of 92%.
- There has been a significant reduction in the number of scheme houses and apartments completed since 2006. This indicates that during the life of the previous Development Plans (CDP and SEDP), the majority of houses were built in rural locations, on unserviced land.
- The 2011 Census recorded that 22.2% of all permanent housing units in County Sligo were vacant, which is significantly higher than the national average of 14.5%.
- There is a significant number of one-person households, which have seen a notable increase since 2006 as a percentage of the total number of households.
- Approximately 20% of the total number of private households within the County live in private rented accommodation.

Social housing requirements

- The 2013 housing need assessment for Sligo indicated that there were 770 households on the social housing waiting list.
- Based on current trends, it is estimated that approximately 2,162 persons will require social housing by 2023 which equates to 865 households.
- The Urban Regeneration and Housing Act 2015 places the focus of Part V on the delivery of social housing, with a requirement for up to 10% social housing in developments in excess of 9 units. In the operation of these revised Part V arrangements, the priority will be to secure social housing units on-site. The making of cash payments in lieu of social housing is to be discontinued. It is considered reasonable to apply a requirement of 10% of all land zoned for residential use or a mixture of residential and other uses, be reserved for the purposes of Part V.

Initial and revised housing land provision

• It is was initially estimated that the County Development Plan would have to cater for circa 5,500 additional persons between 2017 and 2023, in order to comply with the population targets set by the Regional Planning Guidelines 2010.

The more recent County population projections, revised in accordance with the NPF, indicate that between 5,088 4,900 and 6,325 6,125 additional persons may need to be accommodated by 2023. The current housing land provision is considered sufficient to cater for the revised population figures, as detailed in the Core Strategy (as amended).

• 3,705 housing units will be required were initially deemed necessary to accommodate the estimated population increase over the period of the Plan.

As indicated in resulting from the amended Core Strategy Tables A and B (Section 3.4 of this Plan), circa 3,624 3,000 housing units will be required by 2023. This figure is similar to lower than the initial provision of the Housing Strategy.

- The housing land provision as specified in the Core Strategy of the CDP 2017-2023 is more than sufficient to meet Sligo's housing needs up to 2023, even allowing 50% overhead to facilitate an element of choice as recommended by the DECLG Development Plan Guidelines for Planning Authorities (refer to the Core Strategy tables A and B in Section 3.4 on page 29).
- The Core Strategy for the County Development Plan 2017-2023 should ensure that the amount of land zoned for residential purposes within the County area does not exceed that allocated within the CDP 2011–2017. However, in order to promote growth in the Gateway City Regional Growth Centre, consideration should be given to expanding the options for residential development in the future Sligo and Environs LAP by offering a wider choice of location on additional sites.

Draft Amendment No. 51

In **Chapter 5 Housing**, insert new Section 5.1.1 (text shown below in blue) and modifications in green and renumber the subsequent sections as 5.1.2 and 5.1.3

5.1.1 Securing compact growth

Seeking to curtail the trend of greenfield sprawl that extends the physical footprint of urban areas, the 2018 National Planning Framework favours a compact development approach that focuses on reusing previously developed, "brownfield" land, building up infill sites which may not have been built on before, and either re-using or redeveloping existing sites and buildings.

The NPF indicates that such compact forms of growth can make a "transformational difference" to settlements of all sizes, bringing "new life and footfall", contributing to the viability of services, shops and public transport, thus reducing travel distances and related energy demand.

National Policy Objectives 3a, 3b and 3c target the delivery of specific ratios of all new homes within the built-up footprint of settlements, in proportion to the settlement size.

The built-up footprint of a settlement is contained within the census boundary defined by the CSO "in line with UN criteria, i.e. having a minimum of 50 occupied dwellings, with a maximum distance

between any dwelling and the building closest to it of 100 metres, and where there is evidence of an urban centre (shop, school etc.)"

The 2020 Regional Strategy also embraces the principle of compact growth, which "will be pursued to ensure sustainable growth of more compact urban and rural settlements, supported by jobs, houses, services and amenities, rather than continued sprawl and unplanned, uneconomic growth" (Section 2.2 Growth ambitions, p. 23 of the RSES).

The Strategy states that the identification and delivery of appropriate development lands within the existing built-up footprint of urban places is a central tenet to the RSES.

Regional Policy Objective 3.2 promotes the delivery of at least 40% of all new housing targeted in the Regional Growth Centres and 30% of all new homes in other settlements within the existing built-up footprint, while RPO 3.3 encourages the delivery of at least 20% of all new housing in rural areas on brownfield sites.

Modifications to Draft Amendments to Chapter 8 of the CDP

Draft Amendment No. 56

In Section 8.1.2 replace the section title, delete the text in red and insert the text in blue and modifications in green as follows:

8.1.2 Provisions of the Regional Planning Guidelines

Regional policy on accessibility

Border Regional Planning Guidelines (2010)

One of the Key Strategic Goals in the 2010 Regional Planning Guidelines is to improve connectivity in the Region through the development of Strategic Radial Corridors and Strategic Links.

The RPGs identified the M-4/N-4 Western Radial Route as a Strategic Radial Corridor, linking Dublin with Sligo. The N-4 (Collooney to Castlebaldwin section) is was a priority route for improvement.

The Atlantic Corridor, which includes the N-15 and the N-17, is was identified as a Strategic Link. Priorities for this route are were the N-17 (Bellaghy to Collooney section) and the N-15 (Sligo to Leitrim county boundary section).

The West/North Central Corridor N-16/A-4, which linked the Gateway of Sligo with Enniskillen in Northern Ireland, is was also identified as a Strategic Link, which required substantial investment. The key priority for this route is was the N-16 (Sligo to Enniskillen).

The RPGs supported the integration of road, rail, and bus transport at key locations and the development of park-and-ride facilities particularly within the Gateways.

The re-opening of the Claremorris–Sligo railway line is was seen as a long-term priority for the Region, but only when the other sections of the Western Rail Corridor are would have been completed and operational. The RPGs also supported examining the potential of a rail link from Sligo to Letterkenny.

The RPGs supported the Government's Smarter Travel Policy and the National Cycling Policy Framework, as well as other measures to encourage cycling and walking, particularly in urban centres such as Sligo.

NWRA Regional Spatial and Economic Strategy (2020)

Among the "Growth ambitions" stated in Section 2.2 of the RSES, the "Connected Ambition" relates to accessibility and mobility within the Region. The Strategy supports further investment in sustainable transport measures.

Regional Policy Objective 6.2 is designed to "Support, enhance and enable investment in the development and diversification of our network of key Airports and Seaports/Harbours, providing them with adequate and efficient capacity and ensuring they have high-quality sustainable transport

connectivity, including road, rail, cycling and pedestrian infrastructure, as appropriate and subject to environmental considerations".

Among the national roads projects integrated with the targeted development of major urban centres in the Region, the RSES support investment in improvements to the N-4 Collooney to Castlebaldwin (RPO 6.6), N-17 Knock to Collooney (RPO 6.7), N-15 Sligo to Bundoran, N-16 Sligo to Blacklion and N-59 upgrades (RPO 6.8).

RPOs 6.9, 6.11and 6.13 to 6.16 promote further investment in upgrading or providing transport infrastructure, including the Eastern Garavogue Bridge and Western Distributor Road in Sligo, Western Rail Corridor, Sligo-Dublin rail line, smarter travel etc. Additional RPOs in Section 6 of the RSES promote bus services, rural transport, walking and cycling, as well as the extended provision of charging infrastructure for electric vehicles.

RPO 6.27 of the RSES supports the preparation of a Local Transport Plan for Sligo Town, in conjunction with the NTA and all other relevant stakeholders, in accordance with ABTA (Area-Based Transport Assessment) guidance and alignment with environmental policy.

Modification to Draft Amendment No. 35

Core Strategy Table B. Additional population and housing land requirements in County Sligo by 2023

		Α	В	С	D	E	F	G	Н	I
Table is b format se illustrativ in Appene Guidance	lified Core Strategy ased on the et out in the we example shown dix 2 (p. 14) of the Note on Core (DEHLG, November	Population as recorded in the 2016 Census (or estimated population for the 32 villages)	NPF/RSES target population by 2023 (County and Sligo City) or CDP recommended population for towns and villages	Core Strategy population allocation (in addition to 2016 Census figures or estimates)	Housing land requirement for allocated population (ha)	Existing zoned land (i.e. as per initial 2017 CDP) (ha)	Proposed zoned land (no change to zoning proposed in the Draft Variation No. 1)	Housing yield from residential land (ha)	Housing yield from other lands (ha)	Shortfall or excess
1	County Sligo	65,535	71,660	6,125	-	-	-	-	-	-
2	Sligo City (principal urban area of the RGC)	19,200	23,050	3,850	55.0	43.0	subject to future LAP	subject to future LAP	subject to future LAP	subject to future LAP
3	Ballymote	1,549	1,900	351	9.8	21.1	21.1	21.1	0.0	11.3 ha excess
4	Enniscrone	1,156	1,450	294	8.2	20.0	20.0	14.0	6.0	11.8 ha excess
5	Tobercurry	1,986	2,400	414	11.5	no zoning	subject to future LAP	subject to future LAP	subject to future LAP	subject to future LAP
6	32 villages	13,850	14,300	450	17	114.0	114.0	114.0	0.0	no shortfall or excess
7	Countryside (rural areas outside towns and villages)	27,794	28,560	766	n/a	0.0	0.0	0.0	0.0	n/a
8	Totals				198.4	198.1	subject to future CDP and LAPs	subject to future CDP and LAPs	subject to future CDP and LAPs	subject to future CDP and LAPs

Please find the assumptions, rationale and explanatory notes on the next pages.

Assumptions and rationale for the modified Core Strategy Table B

Assumptions regarding average household sizes

- **A-1.** Empirical evidence obtained through pre-planning meetings indicates that the households most likely to seek new family homes in County Sligo usually consist of a young couple and at most one child (or no child). Therefore, the average household size for calculating the housing requirements of additional population, assumed to be composed mainly of newly-formed households, has been set at 2.2 persons.
- **A-2.** The above average household size has been decreased to 2 persons for the Sligo and Environs area, where there is a growing housing demand from one-person households, mostly older people living alone. This demographic segment is growing faster in the Sligo and Environs area than in other parts of the County.

Rationale for the chosen average residential densities

R-1. The Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities (DEHLG, 2009) recommend 35 to 50 units per hectare on "outer suburban greenfield sites", which corresponds to the characteristics of greenfield lands currently zoned for housing in the Sligo and Environs area.

The 35 units/ha average residential density for future housing areas in Sligo Town has been chosen at the lower end of the range recommended in the Guidelines in order to calculate the maximum amount of land that may be required.

R-2. The Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities (DEHLG, 2009) recommend 15 to 20 units per hectare on lands located on the "edge of small town/village", in order to offer an effective alternative to the provision of single houses in surrounding unserviced rural areas. The majority of greenfield sites/lands currently zoned for housing in the towns of Ballymote and Enniscrone (which have LAPs in place) are located at the periphery of the existing built-up areas.

The Draft Tobercurry LAP provided for the same average residential density (18 units/ha) on greenfield lands.

R-3. An average density of 12 units/ha has been chosen for greenfield lands zoned on the periphery of smaller villages, again, in order to "offer an effective alternative to the provision of single houses in surrounding unserviced rural areas", as per the Guidelines.

It should be noted that, despite this presumably "attractive" low-density provision, no multi-unit development has taken place on greenfield lands zoned for residential use in Sligo's villages in the past decade (Strandhill being the only limited exception).

EXPLANATORY NOTES for each cell of the Core Strategy Table B

County (row 1)

Cell B1 – Projected 2023 County population is composed of 2016 population (Census) + 6,125 (7 years x 700 persons per year x 1.25 headroom)

Cell C1 – **additional population by 2023**, as adjusted following OPR and NWRA recommendations (using 7 out of 10 years apportionment instead of 8 out of 11 years).

Sligo Town (row 2)

Cell B2 – Targeted 2023 Sligo Town population is composed of 2016 population (Census) + 3,850 (7 years x 440 persons per year x 1.25 headroom),

Cell C2 - additional population by 2023, as adjusted following OPR and NWRA recommendations (using 7 out of 10 years apportionment instead of 8 out of 11 years).

Cell D2 – 55 ha is the housing land requirement for 3,850 additional persons, based on an average household size of 2 persons and an average residential density of 35 units/ha;

Cell E2 – the existing 43 ha of zoned land as per Variation No. 2 (Core Strategy) of the SEDP (2012), are composed of 23.9 ha of residential zoning and 18.9 ha residential yield from mixed-use zones (50% from MIX-1 zoning and 25% from C2 and NC zoning).

Cells F2, G2, H2, I2 – the existing zoning needs to be reviewed in the context of the future Sligo and Environs LAP.

Ballymote (row 3)

Cell B3 – there is no change to the population level recommended in the CDP 2017-2023, which includes a 22% growth over the 2016 Census figure.

Cell C3 - additional population by 2023, as recommended in the CDP 2017-2023.

Cell D3 – 9.8 ha is the housing land requirement for 351 additional persons, based on an average household size of 2 persons and an average residential density of 18 units/ha;

Cell E3 – existing greenfield zoned land, as per Ballymote LAP 2012, consists of 21.1 ha residential zoning. There are only 0.6 ha of mixed-use zoned lands, which are not considered suitable for residential development, therefore their potential yield is zero.

Cells F3, G3, H3 – no change is proposed to the existing zoned land allocated to Ballymote by 2023.

Cell I3 – the calculated 11.3-ha excess will be addressed as part of the next CDP 2023-2029 (based on Census 2021 population figures) and the subsequent Ballymote LAP.

Enniscrone (row 4)

Cell B4 – there is no change to the population level recommended in the CDP 2017-2023 which includes a 25% growth over the 2016 Census figure.

Cell C4 - additional population by 2023, as recommended in the CDP 2017-2023.

Cell D4 – 8.2 ha is the housing land requirement for 294 additional persons, based on an average household size of 2 persons and an average residential density of 18 units/ha;

Cell E4 – Existing greenfield zoned land in Enniscrone is composed of 14 ha residential land and 50% of 12 ha mixed-use land.

Cells F4, G4, H4 – no change is proposed to the existing zoned land allocated to Enniscrone by 2023.

Cell I3 – the calculated 11.8-ha excess will be addressed as part of the next CDP 2023-2029 (based on Census 2021 population figures) and the subsequent Enniscrone LAP.

Tobercurry (row 5)

Cell B5 – there is a 21% change to the population level recommended in the CDP 2017-2023, in line with the allocations for Ballymote and Enniscrone. The 2023 recommended population should be 2,400 instead of 2,000.

Cell C5 - additional population by 2023, as recommended in the CDP 2017-2023 and modified by adding a 21% headroom in line with similar provisions for Ballymote and Enniscrone.

Cell D5 – 11.5 ha is the housing land requirement for 414 additional persons, based on an average household size of 2 persons and an average residential density of 18 units/ha;

Cell E5 – The Draft Tobercurry LAP 2015 proposed to zone 19.5 ha of greenfield land and 6.4 ha of mixed-use land. This LAP was not adopted. Any new Draft LAP for Tobercurry will review and modify the zoning in consultation with relevant stakeholders.

Cells F5, G5, H5, I5 – zoning for residential and mixed uses in Tobercurry will be addressed as part of the next CDP 2023-2029 (based on Census 2021 population figures) and the subsequent Tobercurry LAP.

32 villages (row 6)

Cell A6 – the figure is based on estimates (resulted from village surveys carried out by planners) and actual Census figures (where available).

Cell B6 – there is no change to the population level recommended in the CDP 2017-2023.

Cell C6 - additional population by 2023, as recommended in the CDP 2017-2023.

Cell D6 – 17 ha is the housing land requirement for 450 additional persons, based on an average household size of 2.2 persons and an average residential density of 12 units/ha;

Cell E6 – Existing greenfield land zoned for housing in the 32 villages.

Cells F6, G6, H6 – no change is proposed to the existing residential zoning in villages by 2023.

Countryside (row 7)

Cell A7 – the 2016 population of the countryside (calculated as County population minus town and village population) would be 27,794 persons.

Cell B7 – the 2023 population of the countryside (calculated as County projected population minus town and village target population) would be 28,560

Cell C7 – additional population by 2023 would be 766 persons.

Proposed Appendix J to the Sligo CDP 2017-2023

Sligo Regional Growth Centre Strategic Plan (RSES)

- Regional Policy Objectives

Strategic Goal – Compact Growth

RPO 3.7.37

Support population growth in the principal urban area of Sligo to a level of at least 27,200 persons by 2040.

RPO 3.7.38

Facilitate the provision of 3,000 to 5,000 residential units to accommodate the additional population envisaged by 2040.

RPO 3.7.39

Ensure that at least 40% of new residential and employment-related development in the Regional Growth Centre occurs within Sligo's existing built-up urban area, through regeneration and consolidation on infill and brownfield sites.

RPO 3.7.40

Enhance intra-urban access by providing an additional north-south connection through the Eastern Garavogue Bridge and Approach Roads Scheme, to be completed by 2021.

RPO 3.7.41

Kick-start development to the south-west of the urban core by completing the Western Distributor Road by 2020.

RPO 3.7.42

Prioritise new residential and employment related development on greenfield sites in the areas served by the Western Distributor Road at Caltragh and Oakfield, and at Ballinode, which will be served by the Eastern Garavogue Bridge and Approach Roads Scheme.

RPO 3.7.43

Improve urban circulation by increasing junction capacity along Sligo's Inner Relief Road (N4/N15) and provide new link roads, as necessary, to complete the "ring route" around the town centre.

RPO 3.7.44

The Assembly supports the preparation of a building heights study, a strategy to guide the future development of the regional centre. The study will take into account the historic, cultural and infrastructural features of the area. In developing this strategy, areas of high density will target the minimum density rates of 50 units per hectare (in the town centre area) and a default rate of 35 units per hectare otherwise.

RPO 3.7.45

The Assembly supports the retention of existing agricultural land within the RGCSP boundary for that purpose unless it is subject to objectives for the zoning of lands for particular purposes (whether residential, commercial, industrial, recreational, as open space or otherwise) in a statutory plan. Only in exceptional circumstances would it support the development of new residential, industrial or commercial uses on unserviced greenfield sites and these shall be defined through the statutory plan-making process.

Strategic Goal – Enterprising Sligo

RPO 3.7.46	RPO 3.7.47
Facilitate the development of a new IDA	Promote Local Heritage and Culture to deliver
Business Park at Oakfield, to the south-west	high-quality cultural and tourism products of
of the urban core.	Regional and National significance.

Strategic Goal – Liveable Sligo

RPO 3.7.48

Upgrade the town centre environment through focused interventions in O'Connell Street, Stephen Street and car park, Rockwood Parade, Market Cross, Old Market Street and Quay Street car park, followed by gradual improvements of streets adjoining the centre.

RPO 3.7.49

Prepare/commission and implement a new masterplan for the Centre Block (Wine Street car park).

RPO 3.7.50

Complete the remaining phases of the major recreational complex planned at Cleveragh Estate and Doorly Park, adjoining the Garavogue River.

RPO 3.7.51

Continue the expansion of cycleways and walking routes throughout the urban area and outwards to the satellite villages of Ballysadare, Strandhill and Rosses Point, linking into established and planned recreational trails such as Union Wood, Knocknarea etc.

Strategic Growth Areas

RPO 3.7.52

Promote the consolidation of the existing IDA business Park at Finisklin and the possible expansion of other business and enterprise activities into the Northern Docklands area.

RPO 3.7.53

Encourage new companies to locate on lands zoned for business and enterprise at Ballytivnan and Rathbraughan, to the North of the Urban Core.

RPO 3.7.54

Strengthen physical connectivity by improving National Road links to Dublin (N-4), Galway (N-17), and Letterkenny (N-15) as well as the cross-border link to Enniskillen/ Belfast (N-16).

RPO 3.7.55

To give effect to the infrastructure needed to transform Sligo into a 'Smart City', able to provide advanced digital services to citizens and businesses.

RPO 3.7.56

Support the development of a major tourist attraction in Sligo Town, as well as further expansion in the tourism functions of villages Strandhill and Rosses Point.

RPO 3.7.57

Seek an increase in the number of jobs in the Regional Growth Centre to 17,000 by 2040.

<u>Errata</u>

The following list of errors was appended to the Chief Executive's Report on 23 October 2020, after the adoption of the Variation No. 1 of Sligo CDP 2020.

1. On **page 15** of this Report, the Chief Executive's recommendations on Issue no. 10 of the NWRA submission are followed by the summary of Issue no. 12 of the NWRA submissions. While it may appear that Issue no. 11 was not addressed, this is not the case. Issue no. 10 addresses the NWRA recommendation on DA-14, while Issue no. 12 addresses the NWRA recommendations on DA-15.

This is only a numbering error. No issue has been missed.

2. There is an "Issue no. 15" on **page 17** of this Report (dealing with NWRA recommendation on DA-21) and a second "Issue no. 15" on **page 18** of this Report (dealing with NWRA recommendation on DA-22).

This is also a numbering error. All the NWRA recommendations have been addressed.

3. On page 45, the last two paragraphs of DA-28, as recommended to be modified, should read as follows (see highlighted figures):

Sligo and Environs area (Sligo City – principal urban area of Sligo RGC)

According to the RSES, over the eleven-ten-year period between 2016 and 2026, Sligo City's population is projected to grow by up to 4,400 persons, or 400 440 persons per year on average. The corresponding population increase over the eight seven years from 2016 to 2023 would be circa 3,200 3,080, for a total of 22,400 22,280 persons.

Adding a similar 25% headroom to the 3,200 **3,080** targeted population increase would result in a potential growth of 3,850, leading to a 2023 Sligo City population of 23,050 persons.

4. In the Modification to Draft Amendment No. 35 – Core Strategy Table B (p. 60, not numbered), in the bottom row of the table, cell D8 contains the figure 198.4 (ha).

This is a typing error. The correct figure is 101.5 (ha), which is the sum of cells D2, D3, D4, D5 and D6 above.