



Oifig an  
Rialaitheora Pleanála  
Office of the  
Planning Regulator

24 August 2020

Ms Janet McNamara  
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Planning Section  
Sligo County Council  
City Hall  
Quay Street  
SLIGO  
F91 PP44

**Re: Proposed Variation No. 1 of the Sligo County Development Plan 2017-2023**

A chara,

Thank you for your authority's work in preparing Proposed Variation No.1 of the Sligo County Development Plan 2017-2023 (the variation).

In accordance with the provisions of section 31AM of the Planning and Development Act 2000, as amended (the Act), the Office is obliged to evaluate and assess development plans and variations of development plans in the context of certain statutory parameters including:

- 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.

This variation presents an opportunity to refine the terminology used in the County Development Plan to enhance alignment with higher level plans (NPF & RSES) and to avoid any potential or perceived conflict with the policies and designations set out in those higher plans. Accordingly, the

Office welcomes the proposed variation and is generally satisfied that it will align the plan with the NPF and RSES. The submission below has been prepared to provide a high-level input to your authority in finalising the proposed variation of the plan.

## **1. Matters within the scope of section 10 and section 10(2)(n)**

The proposed variation of the Sligo County Development Plan 2017-2023 amends the existing written statement of the plan and the development objectives for the area to align with, inter alia, the transitional population projections in the NPF, Sligo's designation as a Regional Growth Centre (RGC), and regional policies in the RSES.

### **1.1 Section 10(2A) Core Strategy**

A substantial number of the amendments that make up the variation relate to the Core Strategy and therefore the provisions of S10(2A), circular PSSP6/2010 issued by the Department of Housing, Planning and Local Government and the associated 'Guidance Note on Core Strategies' November 2010 as issued by the Minister for Housing, Planning and Local Government are of particular relevance to our evaluation and assessment.

A number of the Office's comments relate to the methodology and numerical exercise undertaken as part of the Core Strategy, which relate in particular to Amendments 28 and 29, including table 3.1.

Amendment no. 28 of the variation, seeks to augment the 'Population considerations' in line with the NPF Implementation Roadmap and RSES allocations. The projections are based on an apportionment of the overall growth envisaged by the RSES up until 2026, which is three years beyond the life of the plan. The apportionment set out is based on an eleven-year period between 2016-2026, thereby providing an average 636-person population increase per annum and 5,088-person population increase by the 2023 horizon of the current plan, based on an eight-year complement of an overall eleven-year timeframe. A similar approach is employed for Sligo and Environs population projections.

Notwithstanding the above, your authority might consider whether the more correct basis for any apportionment would be taken out of the ten-year period between 2016-2026, meaning that the proposed variation should account for seven of the above ten-year timeframe, i.e. to 2023 and circa 700 persons per annum and 4,900 persons for the plan period.

In addition, it would appear that under amendment 28 that your authority is availing of the maximum 25% headroom available, as allowed under the provisions of the NPF Implementation Roadmap

(section 3(a) refers), in respect of the population projections for the County and have decided not to avail of same in relation to Sligo Town and environs, which is a designated Regional Growth Centre (RGC). Whilst there is no requirement in the Roadmap to utilise the headroom allowance, in full or in part, your authority might reflect on the background context and / or rationale for adopting the approach taken.

Amendment 29, comprises an updated table 3.1 which sets out a broad structure for anticipated population change across the County to 2023, based on the NPF and RSES. Your authority should check whether there may be some internal discrepancies in relation to the combined population of the 'key support towns' [5,100] versus the sum of the values indicated [5,350]. Notwithstanding any minor discrepancy, bearing in mind the above comment that the population projections should be based on a revised apportionment of seven out of ten-years, two strategic issues can be observed.

Firstly, given the demographic impact of the 2008-2013 downturn across the country, the RSES populations projections are more realistic than those previously envisaged by the RPGs. In this regard, it is observed that the difference between the former RPG target and the up-to-date RSES target, is 5,490 persons<sup>1</sup>.

Secondly it is observed, from examination of table 3.1, that the population projections for 'Sligo and Environs' and the 'Rural areas', have been adjusted downwards by 1,300 persons and 3,940 persons, respectively to largely account for the revised RSES target, noting that there is no proposed adjustment in respect of the key support towns or villages. It is the Office's view that the next Sligo County Development Plan is likely to require a more comprehensive review of the population allocations and targets across all levels of the settlement hierarchy. In particular, 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.

Notwithstanding the quantitative element and calculations, your authority should consider any clarifications that may be required in the written statement in relation to the rationale behind the strategy employed. This should explain the rationale in respect of the new population targets set out in table 3.1 and demonstrate the proper planning and sustainable development context for same, including the policies set out in the NPF and RSES.

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<sup>1</sup> Based on the eight out of eleven-year complement of population increase, not seven out of ten-year.

### **Observation 1.**

*Having regard to the provisions of Section 10(2A), circular PSSP6/2010 and the associated 'Guidance Note on Core Strategies' November 2010 as issued by the Minister, your authority should consider the following:*

- *Revised population targets based on a seven year complement out of the overall ten-year period from 2016-2026 to align with the expiry period of the current development plan in 2023.*
- *A rationale for the inclusion of the full headroom allowance of 25% from the NPF Implementation Roadmap for the county at large population projections compared to not availing of such headroom for the Sligo Regional Growth Centre.*
- *Additional commentary 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 including the towns, villages and rural area, as set out in table 3.1.*
- *Revisions to table 3.1 of the Core Strategy to regularise internal inconsistencies in relation to the cumulative population projections for the 'key support towns' (5,100 person) relative to the allocations to each settlement [Ballymote - 1,900, Enniscrone – 1,450 Tobercurry- 2,000 =5,350 persons].*

In considering the above refinements to the core strategy calculations and rationale, the Office consider this would warrant a statement to acknowledge the planning authority's intentions in respect of a more comprehensive review of the settlement hierarchy and population allocations as part of the forthcoming review process of the Sligo County Development Plan.

## **1.2 Sligo and Environs LAP**

Amendment no. 32, sets out additional narrative on the housing land requirements for the forthcoming Sligo and Environs LAP, 2021, therein it states that:

*'... 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 period<sup>1</sup>, i.e. up to 2031, in line with the Regional Strategy.'*

The footnote associated with this section refers to Section 19(1)(d-f) whereby the life of a Local Area Plan (LAP) may be extended after five years by a period up to five years. This is followed by narrative

on the RSES 2031 population target and an analysis of the breakdown of the full population complement (6,600 person) on infill/brownfield sites and greenfield lands. These sentiments are further echoed in Amendment no. 37 which state:

*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.*

As currently worded, the proposed variation could give the impression that a LAP may be prepared for a 10-year period from the outset. This is not the case under the legislation, the facility to extend the life of a LAP from six to ten years being a decision for the planning authority in cases where the objectives of the plan have not been secured. In such cases, where the plan remains consistent with higher-order plans and strategies there is the legislative scope to defer the notice of the commencement of a review. That is not to say that a LAP may not, in addition to setting out its objectives over its six-year statutory lifespan, situate those objectives within a longer-term outlook of relevant local, regional and national policy. Indeed, the Office acknowledges and welcomes Sligo County Council's intentions to prepare a long term strategic vision for Sligo RGC to 2030 as part of the review of the Local Economic and Community Plan (LECP) to be undertaken by the Local Community Development Committee (LCDC) under the provisions of the Local Government Reform Act 2014. This will be an important input to inform the statutory LAP on land use and zoning objectives for the six-year horizon of the plan made by the planning authority.

**Observation 2:**

*Having regard to the provisions of Section 10(2A), circular PSSP6/2010 and the associated 'Guidance Note on Core Strategies' November 2010 as issued by the Minister, your authority should consider modifying the references in the amended core strategy to the next Sligo and Environs local area plan that it will be prepared on the basis of a six-year statutory lifespan, rather than the ten-year horizon alluded to in amendments no. 32 and 37.*

### 1.3 Core Strategy Tables

The Core Strategy tables are addressed under Amendments no. 34 and 35. From a review of figures informing these tables, it is unclear what basis underpins the household sizes of 2 and 2.2 persons per household employed, bearing in mind that the NPF indicates an average household size of 2.7 and an anticipated average household size of 2.5 by 2040.

The density assumptions used in the tables; 35uph for Sligo and Environs and 12uph for the County are also considered to be out of line with the Planning Guidelines for Sustainable Residential Development in Urban Areas (2009). The Office notes that it is a requirement of S10 2(A) that the Core Strategy is consistent with planning policy requirements of section 28 guidelines and the 'Guidance Note on Core Strategies' clearly reinforces that density assumptions used in the preparation of a Core Strategy should be consistent with the Planning Guidelines for Sustainable Residential Development in Urban Areas (2009).

Similarly, the Core Strategy tables A and B should give consideration to the residential potential on land zoned for mixed-use including residential (as required by Section 10(2A)(c)) and should provide an analysis or detail on any shortfall or excess of land or housing capacity at a high level. This exercise is of particular relevance to Sligo RGC which has several strategic growth areas and regeneration sites identified and supported in the RSES.

Moreover, the Core Strategy should provide the clear framework for compliance with National Policy Objective (NPO) 3 and Regional Policy Objective (RPO) 3.7.39 in relation to compact growth. To this end, the Guidance Note on Core Strategies (2010) provides a useful illustrative example of a Core Strategy table in appendix 2.

#### **Recommendation 1:**

*Having regard to the provisions of Section 10(2A), circular PSSP6/2010 and the associated 'Guidance Note on Core Strategies' November 2010 as issued by the Minister, the Office requests that the planning authority modify the core strategy tables 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.*

### **Observation 3:**

*Having regard to the provisions of Section 10(2A), circular PSSP6/2010 and the associated 'Guidance Note on Core Strategies' November 2010 as issued by the Minister, and the demographic projections including those set out in the NPF, NPF Implementation Roadmap (2018) and the RSES, your authority should clarify the basis for using an average household size of 2 (county) and 2.2 (Sligo) and its consistency with the NPF.*

## **2. Consistency with national and regional policy**

The Office acknowledges that purpose of the variation is to comply with the requirements of the planning legislation in accordance with section 11(1)(b) of the Act and to align the County Development Plan with the recent changes in national and regional policy, as set out in the NPF and RSES respectively. It is also acknowledged that a full review of the County Development Plan will be instigated in 2021.

The Office considers that the changes proposed in the variation are generally consistent with the transitional population projections for the county and RGC of Sligo as outlined in the NPF and NPF Implementation Roadmap.

However, the Office considers that the Core Strategy, as varied, requires some further work to align sufficiently with the NPF and RSES in respect of the county settlement hierarchy and terminology used to define the RGC, this is further discussed in section 2.1 below.

The references to Sligo as a city, might create confusion about its status as a Regional Centre in the NPF. The Office considers 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%. Furthermore, the references to the Sligo sub-region area could be perceived to conflict with the NWRA area, sub-regions.

As outlined at the outset, the purpose of this variation is to incorporate the provisions of the NPF and RSES into the current development plan; these documents supersede and replace the former National Spatial Strategy (NSS) and Border Regional Planning Guidelines (RPGs). It is understandable that a level of referencing to the historic documents may be necessary to highlight evolution in policy and provide a background context. However, it is considered that there is greater scope to revisit references to now superseded spatial policy documents, which is particularly relevant to Amendment numbers 33, 54, 55 and 56.

**Observation 4:**

*The Office considers that there is greater scope to improve the alignment between this plan and higher level plans, NFP and RSES, through the terminology associated with the designations in the settlement hierarchy and within the plan generally.*

**Observation 5:**

*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.*

## **2.1 Settlement Hierarchy & Core Map**

Amendment no. 20 sets out changes to the settlement hierarchy, which relate to the titling of the settlement type only and remove the reference to 'Gateway' as this was a feature of the former NSS. Likewise, the core strategy map (Amendment no. 16), indicates only minor alterations to the referencing. The Office considers that this variation presents an opportunity to adjust the settlement hierarchy, particularly with respect to the lower tier villages, to more fully align with national and regional policy objectives.

The Office acknowledges that the settlement hierarchy identified in the plan is not fundamentally inconsistent with the higher planning policy framework. However, having regard to the significant changes in the broad policy context, the Office does consider that through this variation there is scope to improve the alignment between the RSES, Regional Growth Centre Strategic Plan and the settlement hierarchy.



Furthermore, the Office sees that there is an opportunity to more fully reflect the policies of the RSES with regard to the Sligo RGC within the broader settlement hierarchy which includes satellite towns, villages, settlements with special functions.

Similarly, in the context of the NPF (NPOs 14-25) and RSES policies in respect of planning for diverse rural places, the Office considers that the approach to rural settlements might reflect the different socio-economic functions of the settlements and their geographic context relative to Sligo RGC and other settlements within and adjoining the county.

**Observation 6:**

*Your authority should 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 sub-character areas including: RGCSA 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 RGCSA area, character areas and settlements within the county and the overall vision for the county.*

## **2.2 Local Transport Plans**

The Office welcomes and acknowledges that Amendment 54-56 sets out a number of changes and references to transportation policies and objectives set out in the higher level plans. RPO 6.27 supports the collaborative preparation of Local Transport Plans by local authorities in conjunction with the NTA and other stakeholders, to inform forthcoming plans. The Office considers a specific reference to this policy would be warranted, given its significance for land use planning in the of Sligo RGC.

**Observation 7:**

*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. 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.*

### **3. Policy directives issued under section 29**

The Office confirms that no issues arise in this regard.

### **4. Other legislative and policy matters as the Minister may communicate**

The Office confirms that no issues arise in this regard.

### **Summary**

The Office requests that your authority addresses the recommendations outlined above, which are made in the context of the provisions of Section 31AM(3)(a), in order to ensure that the County Development Plan is consistent with relevant national policy objectives, guidelines and legislative requirements.

The Chief Executive's report prepared for the elected members under section 13 of the Act must summarise this recommendation and the manner in which it should be addressed.

Your authority is required to notify this Office within 5 working days of the making of the variation and send a copy of the written statement and maps as made, in accordance with section 31AM(6) of the Act.

Where the planning authority decides not to comply with a recommendation of the Office, or otherwise makes the variation in such a manner as to be inconsistent with any recommendations made by the Office, then the Chief Executive shall inform the Office and give reasons for the decision of the planning authority.

Please feel free to contact the staff of the Office in the context of your authority's responses to the above, which we would be happy to facilitate. Contact can be initiated through the undersigned or at [plans@opr.ie](mailto:plans@opr.ie).

Yours sincerely,



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