



Oifig an
Rialaitheora Pleanála
Office of the
Planning Regulator

24th September 2021

Administrative Officer,
Planning Section,
Sligo County Council,
City Hall,
Quay Street,
Sligo F91 PP44.

Re: Issues Paper for the Sligo County Development Plan 2023 - 2029

A chara,

Thank you for your authority's work in preparing the Issues Paper for the review of the Sligo County Development Plan 2017-2023 (the Plan). The Office of the Planning Regulator (the Office) acknowledges and welcomes the publication of this paper and your authority's work, more broadly, in advancing the review of the Plan.

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 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 Regional Assembly* (the RSES);
- Ministerial guidelines 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.

Subsequent to the publication of the Issues Paper you will have been notified of the publication for consultation of the *Development Plans, Guidelines for Planning Authorities - Draft for Consultation* (August 2021) which provide clarity and assistance to your authority in the completion of your development plan.

The Office has set out some broad areas for your authority to consider in formulating the draft development plan. These observations are offered without prejudice to any observations and recommendations as may be forthcoming from the Office at future stages of the plan making process, and do not affect the obligation on your planning authority to comply with the relevant legislative requirements, or to be consistent with the fullness of the detailed policy context of the higher order plans and strategies and Ministerial guidelines.

Consultation strategies

The need to encourage greater participation in local decision making and the importance of citizens playing a role in influencing the plans which affect their lives and communities is well recognised. One important way to do this is to encourage and facilitate more people to learn about and contribute to their local development plan.

There are many innovative methods which can encourage greater public participation in the development plan-making process. To aid this process, we have produced a document entitled *Increasing Public Engagement in Local Authority Development Plans - A communications toolkit*. It draws on existing good practices already used by many local authorities. It also offers some practical suggestions and cites particular examples which have worked to good effect. You can access the document using the following link - <https://opr.iw.ie/view-file/9>.

Core Strategy & Settlement Strategy

The Issues Paper correctly identifies the 2026 and 2031 population targets for the county as set out in the *Implementation Roadmap for the National Planning Framework* (2018).

The Office welcomes the inclusion of information in the Issues Paper on the *Housing Supply Target Methodology for Development Planning Guidelines (2020)* and its implications for the forthcoming development plan. In this regard, the Office advises the planning authority to ensure that the Core Strategy Table includes Housing Supply Target (HST) figures calculated for the actual development plan period (i.e. not solely for 2026 and 2031). On the basis of information currently available, the Office estimates that the HST for County Sligo is c. 4,150 over the plan period.

The Office notes that the county is coming from a relatively low base in terms of recent housing completions¹ and will need to significantly increase its housing output to meet its HST figure for the forthcoming plan period.

The Office considers that this presents one of the greatest challenges for the development plan and it will be critical to demonstrate how the plan will increase housing development in sustainable locations through land activation measures and targeted funding to unlock strategic sites and make the town centre area more appealing. In this regard, the Office commends the council for the initiatives in the *Sligo Public Realm Plan* and for enhancement projects that have commenced through the Urban and Regeneration Development Fund (URDF).

The Office also welcomes the inclusion of information on the Housing Need Demand Assessment (HNDA) and the recognition that the preparation of the *Sligo County Development Plan and Housing Strategy 2023-2029* shall be based on the county's HNDA. For the avoidance of doubt, this should include the HNDA dataset, guidance and assessment tool, published by the DHLGH in April 2020, details of which are available: <https://www.gov.ie/en/publication/eea99-housing-need-and-demand-assessment-hnda/>. In this regard, it will be important that all data, scenarios, assumptions and constraints are fully and robustly justified.

In respect of the Core Strategy table(s) in the forthcoming development plan, the planning authority is advised to carefully follow the guidance in the *Development Plans, Guidelines for Planning Authorities - Draft for Consultation* (August 2021). Appendix A provides a useful reference and illustrative example of a core strategy table. The table should include information in respect of the area in the development

¹ Page 12 of the Issues Paper

plan already zoned for residential use or a mixture of residential and other uses and the potential housing yield from same for each settlement. In respect of the residential zoned land requirements for the plan period, the table should include the density assumptions informing the requirements for zoned land (i.e. the calculation of housing yield).

The Office notes that the adopted Variation No. 1 of the Sligo County Development Plan 2017-2023 did not amend the term 'key support town' in the county settlement strategy. Since the RSES does not designate any of the county's settlements as a Key Town, the Office welcomes the intent of the planning authority to amend the term to 'support town'² in the forthcoming development plan.

Regional Growth Centre

National Policy Objectives 2b and 7 recognise the key regional role of Sligo Town in the North-West. As such, the NPF designates Sligo Town as Regional Centre and recognises the '*...latent capacity for Sligo to enhance its regional role. This can be achieved through building critical mass of population and further employment, in tandem with enhanced accessibility and quality of life.*'³

As outlined in the Office's submission to *Variation No. 1 of the Sligo County Development Plan 2017-2023*, it is important that the forthcoming development plan refrains from referring to Sligo as a city in its Core Strategy and Settlement Strategy since this would be inconsistent with the status given to it in the NPF and RSES. As previously communicated to the authority, this is not to diminish in any way your ambition for Sligo and its importance as a regional driver of growth.

Given Sligo Town's designation and target for a 40% increase in population by 2040, the Office anticipates that a significant proportion of the county's HST will be allocated to the county town in the Core Strategy.

The Office welcomes the recognition given to the Regional Growth Centre Strategic Plan (RGCSP) in the Issues Paper and agrees that Regional Policy Objectives RPO

² Page 13 of the Issues Paper

³ Page 39 of the NPF

3.7.38⁴ and RPO 3.7.39⁵ are of great significance for the future urban development of the town.

In respect of the envisaged major changes outlined on page 10 of the Issues Paper, the Office welcomes the intent to incorporate into the Core Strategy the main provisions of the RSES and the principal elements of the Sligo RGCSP, and to redraw the Plan boundary for Sligo Town in line with the provisions of the RSES.

Compact Growth and Residential Zoning

The Office welcomes the clarity provided in the Issues Paper on the different requirements for compact growth in Sligo Town and environs and other settlements larger than 1,500 people.

Given the quantum of land zoned in the Sligo Town and Environs area, the Office considers that the delivery of housing targets for the settlement in a compact and sequential form will be a significant challenge for the forthcoming development plan. In this regard, the attention of the planning authority is drawn to the guidance provided in section 6.4.2 and Appendix A (section 1.3.6) in the *Development Plans, Guidelines for Planning Authorities - Draft for Consultation* (August 2021) on settlement consolidation sites.

In respect of any surplus capacity identified from a review of zoned residential land, the planning authority is advised to have regard to the guidance and considerations for 'Additional Provision' of residential lands in section 4.4.3 of the *Development Plans, Guidelines for Planning Authorities - Draft for Consultation* (August 2021). The Office also welcomes the recognition in the Issues Paper of the need to comply with the requirements of the *Urban Development and Building Height Guidelines* (2018) and *Sustainable Urban Housing: Design Standards for New Apartments* (2020) which will be important in terms of promoting compact growth and meeting the needs for smaller housing units identified in the HNDA.

The Office also strongly welcomes the intent of the planning authority to incorporate into the forthcoming development plan all zoning in the county, including the Sligo and Environs area, the towns of Ballymote, Enniscrone, Tobercurry and the villages

⁴ Facilitate the provision of between 3,000 and 5,000 new residential units by 2040

⁵ Compact growth target of 40%

with existing mini-plans, and to review the extent of land currently zoned throughout the county. This would provide greater transparency in terms of demonstrating how compact and sequential growth will be achieved consistent with the HST allocations for each settlement.

Economic Development & Employment

County Sligo forms part of the Atlantic Economic Corridor. One of the key future planning and development and place-making policy priorities for the region is

‘Enhancing the city-region like functions performed by Sligo in line with its statutory development plan, activating the potential for further rejuvenation and renewal of its core and further enhancing its connectivity in a national and regional context to ensure wider accessibility of relevant services and amenities.’⁶

The forthcoming development plan provides an opportunity to embrace the above policy priority in respect of unlocking the potential of the regeneration sites identified in the Sligo RGCSP in the RSES.

The Office notes that the focus will be on developing Sligo Town, with Ballymote, Tobercurry and Enniscrone acting as economic drivers in their surrounding rural areas.

The Office commends the planning authority for its intention to prepare a new strategic framework known as *Sligo 2030* which will become Sligo’s new Local Economic & Community Plan (LECP) and inform the forthcoming development plan. The Office notes that the LECP will identify strategic economic locations within the county from an enterprise and employment perspective and highlight potential new ‘green’ enterprise development opportunities. In this regard, the Office encourages consultation with Transport Infrastructure Ireland (TII) and the National Transport Authority (NTA) to ensure that employment locations and development opportunities consider any implications for the national road network (existing and proposed) and opportunities to promote more sustainable travel.

⁶ Page 41 of the NPF

This would also assist in helping to realise the areas of ambition presented in the *Sligo 2030 Consultation Paper* in particular addressing the challenges of climate change in an exemplary manner⁷.

In respect of tourism and recreational projects such as greenways, the planning authority should ensure that appropriate due diligence is undertaken at an early stage regarding environmental assessments in particular where such projects are located within or close to European Sites.

Transport & Infrastructure

The Office commends the planning authority for commencing an assessment of infrastructure available (or planned) to serve existing zoned lands in larger settlements in consultation with infrastructure providers and which will consider how potential sites would contribute to compact growth. This will ensure that the forthcoming plan is consistent with NPOs 72a, 72b and 72c.

In respect of sustainable mobility, the Office welcomes the recognition of a need for a modal shift away from the private car to active travel and public transport. In this regard, the Office advises the planning authority to include specific modal share targets in the development plan for Sligo Town with possible aggregate targets for the lower tiers settlements. Targets for modal split for the purpose of the draft Plan should be considered in counsel with the objectives of the relevant transport agencies including the NTA and TII.

In respect of the national road network, the planning authority should ensure that the policies in the development plan are consistent with RPO 6.5 regarding the capacity and safety of the region's land transport networks and the *Spatial Planning and National Road Guidelines for Planning Authorities* (2012).

The Office also welcomes the intent to prepare a Local Transport Plan for Sligo Town in consultation with the NTA and relevant stakeholders which will inform the forthcoming development plan and subsequent Local Area Plan (LAP) for Sligo Town.

⁷ Page 11 of the Issues Paper

While it is acknowledged that the county's larger towns have adequate water or wastewater capacity to support growth or there are plans in place to address deficiencies, the Office encourages the planning authority to work proactively with Irish Water to progress projects that deliver infrastructure for the county's smaller settlements through Irish Water's Small Towns and Villages Growth Programme.

Rural Development

The Office welcomes the intent to include a new, substantial chapter dedicated to town and village regeneration in the forthcoming development plan which will seek to access funding under the Rural Regeneration and Development Fund (RRDF) for projects serving local communities.

The Office commends the council for securing RRDF funding for a range of projects that will improve facilities and amenities for local communities and tourism. These initiatives together with providing serviced sites and directing at least 20% of all new housing in rural areas to brownfield sites are critical in terms of demonstrating consistency with NPOs 18 (a & b) and RPOs 3.3 and 3.7.

Such initiatives also have the potential to alleviate pressure on the open countryside through provision of a desirable alternative to one-off housing for families who would like to reside close to the facilities, services and amenities available in rural villages and towns whilst maintaining ties to the wider rural community.

In respect of rural housing policy, the Office advises the planning authority to adopt an approach which defines rural areas under urban influence within the commuter catchment of Sligo Town and rural areas elsewhere and to include policies for each consistent with NPO 19. In this regard, the preparation of the rural area typologies map needs to consider improvements to the national road network such as the N4 - Collooney to Castlebaldwin Road scheme which have the potential to encourage commuting to Sligo Town from a wider catchment.

The Issues Paper acknowledges the requirement of NPO 20 to project the need for single housing in the countryside through the local authority's overall (HNDA). The Office advises that the projected need for single housing in the countryside in the HNDA also considers the current supply of vacant houses.

Flood Risk Management

The Issues Paper acknowledges the need to prepare a Strategic Flood Risk Assessment (SFRA) as part of the forthcoming draft development plan, consistent with *The Planning System and Flood Risk Management Guidelines for Planning Authorities* (2009).

In this regard, the Office advises against the use of information from the Office of Public Work's (OPW) Preliminary Flood Risk Assessment (PFRA) and arterial drainage benefitting land maps to inform the SFRA. The planning authority will need to take account of OPW Flood Relief Schemes and undertake adequate flood risk assessment to determine if there is sufficient information to inform zoning decisions or if further more detailed analysis is required.

Your attention is also drawn to section 4.23 of the SFRA Guidelines concerning the need for plan-making Justification Tests to be carried out (Box 4.1). It is not sufficient that a justification test is left solely to be undertaken at a planning application stage. The Department of Environment, Community and Local Government *Circular PL 2/2014* clarifies that the application of the justification test also applies to existing developed areas of towns and cities located in Flood Zone A and B.

The Office also advises the planning authority to overlay the flood risk information on the land use zoning maps in the forthcoming development plan.

Climate Action and Energy

The planning authority will be aware that the Office's evaluation of the plan is required under section 31AM(2)(a) to address, in particular, matters within the scope of section 10(2)(n) of the Act.

Having regard to the *Climate Action Plan 2019* and to the objectives of the NPF and the RSES, the county's transition to a low carbon economy and the overall reduction in carbon emissions will become a central issue in the preparation of the plan.

In this regard, the Office commends the council for identifying a preliminary Decarbonisation Zone in Sligo Town consistent with the requirement of the *Climate Action Plan 2019*.

The Office welcomes the recognition given to climate action in the Issues Paper which acknowledges the need for alignment between the Sligo County Development Plan 2023-2029 and the forthcoming Local Authority Climate Action Plan.

The Issues Paper also acknowledges the need for the forthcoming development plan to increase the County's resilience to climate change by promoting sustainable development through appropriate policies such as integration of land use and transportation and promotion of sustainable travel patterns and modes of transport.

The promotion of renewable energy sources within the county in accordance with the section 28 *Wind Energy Development Guidelines (2006)*, *Circular Letter PL 5/2017: Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change and Wind Energy Development Guidelines 2006 – Update on Review (July 2017)*, or any replacement guidelines issued by the Minister for Housing, Local Government and Heritage, will also be critical to ensure Ireland meets its national targets and commitments to increase renewable energy supply and reduce greenhouse gas emissions. The planning authority will be aware of the urgency of this matter and of the target for 70% of electricity from renewable resources by 2030 in the *Climate Action Plan 2019*.

In this regard, the attention of the planning authority is drawn, in particular, to the SPPR under the aforementioned interim guidelines. This requires, inter alia, that the planning authority indicate how the implementation of its development plan over its effective period will contribute to realising overall national targets on renewable energy and climate change mitigation, and in particular wind energy production and the potential wind energy resource (in megawatts). The plan must also clearly demonstrate that these targets can be met over the plan period having regard to the policies and objectives of the plan and supporting the Renewable Energy Strategy.

Other Matters

The Office would also like to take this opportunity to draw your attention to a number of recurring issues that have arisen in its evaluation of recent draft Plans.

The need for specialised types of housing, including Traveller accommodation, will be determined through the HNDA. In order to comply with the mandatory objective under section 10(2)(i) of the Act, the draft Plan must provide implementable

objectives for the provision of accommodation for Travellers consistent with the estimated need, and the land use zoning maps must indicate the location of lands to provide for such accommodation.

The NPF highlights the key role of the planning process in realising the potential of extractive industries in identifying and protecting important mineral reserves for future use (NPO 23). The Office advises that the draft Plan should identify or map the location of major deposits as advised by the section 28 *Quarries and Ancillary Activities Guidelines for Planning Authorities* (DEHLG, 2004).

The Office would also like to take this opportunity to commend your planning authority in relation to its approach to rights of way in the current county development plan, as illustrated in the OPR's recently published case study paper. This will provide a sound foundation for the approach to rights of way, and access to the countryside in general, in the draft Plan.

Finally, as discussed above, a key challenge for your authority over the plan period will be in terms of housing delivery in the right place. The *Development Plans, Guidelines for Planning Authorities - Draft for Consultation* (August 2021) recommend a monitoring task for the strategic functions relating to Core Strategy Monitoring and Plan Objectives Monitoring. The Office advises that implementation and monitoring provisions should be clearly set out in the draft Plan, and would most effectively focus on key outcomes, such the core strategy (e.g. population growth and housing delivery), urban and rural regeneration (including rural brownfield development and rural housing), the sustainable transport strategy (e.g. modal share, preparation of Local Transport Plan), climate action (e.g. renewable energy output), biodiversity and landscape (e.g. status of designated habitats).

Summary

In summary, the Office commends your authority for the preparation of this Issues Paper and for outlining the importance of climate action and sustainable transport for the forthcoming development plan.

The Office advises your authority to pay particular attention to the following issues in the preparation of the draft Sligo County Development Plan 2023-2029:

- The county's HST for the plan period and HNDA need to be prepared in accordance with the relevant section 28 Guidelines.
- National and regional objectives for population growth, compact growth and regeneration should be the basis of the Core Strategy, including the settlement hierarchy for your functional area. A significant proportion of the county's HST will need to be allocated to Sligo Town consistent with its designation as a Regional Growth Centre and target for a 40% increase in population by 2040.
- The quantum of land currently zoned for housing needs to be reviewed in terms of its ability to deliver on the HST for the plan period while also providing for compact and sequential development.
- The guidance provided in the *Development Plans, Guidelines for Planning Authorities - Draft for Consultation* (August 2021) should be followed in relation to preparing a core strategy table; settlement consolidation sites; additional provision for surplus zoned land; and monitoring.
- Identify key indicator / metrics related to the implementation and delivery of the Core Strategy and key plan objectives, such as measures that encourage infill/brownfield development in the county's towns and the building of homes within the footprint of rural settlements.
- Provide for the timely preparation of a Local Transport Plan for Sligo Town and Environs to inform the draft Plan and future Local Area Plan for Sligo Town.
- The development of rural housing policies that are consistent with NPOs 18 and 19 of the NPF, and which distinguish between areas under strong urban influence and elsewhere.
- Include targets for modal shift over the plan period aligned to specific implementation and monitoring measures.
- Provide an evidence-based policy framework to meet the need for renewable energy in accordance with the *Climate Action Plan 2019* and the relevant section 28 guidelines.

The Office looks forward to reviewing the forthcoming draft development plan and is committed to continued positive engagement with your authority in the implementation of national and regional policies at county and local level.

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.

Is mise le meas,

A handwritten signature in blue ink that reads "AM O'Connor". The signature is written in a cursive, slightly slanted style.

Anne Marie O'Connor

Deputy Regulator and Director of Plans Evaluations
