



Oifig an
Rialaitheora Pleanála
Office of the
Planning Regulator

9th November 2020

Ms Janet McNamara
Administrative Officer
Planning Section
Sligo County Council
City Hall
Quay Street
Co. Sligo
F91 PP44

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

A chara,

The Office of the Planning Regulator acknowledges the adoption on the 12th October 2020 of variation no.1 of Sligo County Development Plan 2017-2023, as notified by way of email received on 29th October 2020.

The Office welcomes the adoption of variation no.1 of the Sligo County Development Plan (CDP) 2017-2023 and looks forward to continued engagement with Sligo County Council in the implementation of national policy at the local level.

The Office notes that the substance of our recommendation was addressed through the modifications and incorporated into the adopted variation no. 1, likewise a number of our observations were addressed in full.

The Office also recognises that the full review of the county development plan is due to commence in the summer of 2021, and that a local area plan (LAP) for Sligo and Environs will be prepared in the interim, and acknowledges that the planning authority intends to address certain outstanding matters raised through these forthcoming plans.

In this context, the Office considers it timely to offer some advice at this stage on issues that we consider warrant specific attention in these plans.

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Core Strategy - Methodology

The core strategy is based upon average household size of 2 (county) and 2.2 (Sligo town). This was a variable of concern as indicated in our submission (observation no. 3).

In response, the authority indicated that the rationale for the household sizes was based on local knowledge obtained from pre-application consultation. This rationale does not, however, take account of empirical published data by the CSO, which indicates that the average household size in 2016 in Sligo was 2.6 and nationally was 2.7. Likewise, there was no reference to the national projections identified in the NPF which anticipate the national average household size to be 2.5 by 2040.

The Office has concerns about the implications this low household size has on the ability to accurately estimate the quantum of zoned land required. However, we also note that the Department Housing Local Government and Heritage (DHLGH) is expected to issue new section 28 guidelines on Development Plans and guidance on Housing Need Demand Assessment (HNDA) which will provide greater clarity for planning authorities in this regard.

As such, the forthcoming local area plan and county development plan review will be required to have regard to the new guidance, which will also inform the evaluation of any future statutory plans by the Office.

Housing Land Requirement and Densities

The core strategy table B in the Sligo CDP has based the housing land requirement on a density of 35 units per hectare for Sligo regional growth centre, thereby indicating a land requirement of 55 hectares.

The preparation of the Sligo and Environs LAP represents an opportunity to comprehensively appraise the development capacity of zoned lands on a systematic basis, and demonstrate that the densities used to calculate the housing yield, and hence the quantum of zoned land required, are consistent with the *Sustainable Residential Development in Urban Areas Guidelines* (2009).



This process should also have regard to the potential housing yield from mixed use or other non-residential zoned land in determining the quantum of zoned land required to accommodate the population growth identified in the core strategy.

The forthcoming Sligo and Environs LAP will also be required to demonstrate how 30% of new homes will be provided for within the built up footprint of the town, as required under national policy objective 3c of the National Planning Framework (NPF).

As outlined above, the Office considers that the forthcoming guidance from the Department will assist the planning authority in ensuring that their future plans are fully consistent with the guidelines and strategic policy context.

Settlement Hierarchy

Under observation no. 6, the planning authority was invited to further refine the settlement hierarchy to better reflect the diversity in the settlement types across the county and to improve alignment with the Regional Spatial and Economic Strategy for the Northern and Western Regional Assembly (the RSES) in terms of the Regional Growth Centre Strategic Plan area.

In this respect, we acknowledge the response that a significant review of the hierarchy would entail survey work that may not have been achievable within the timeline of the variation process.

The forthcoming development plan review will, however, provide an opportunity to improve alignment with the RSES and NPF on the basis of a comprehensive analysis of the county's settlements including an examination of differing scales, sizes, services and socio-economic functions of each settlement within the county.

Local Transport Plan

Under observation no. 7, the Office advised that the plan should enhance references to regional policy objective 6.27 and clarify that the forthcoming LAP for Sligo and Environs will be informed by a Local Transport Plan.

This will be particularly important in terms achieving sustainable transport patterns to increase the modal split in favour of active travel modes and public transport, where



available, in accordance with the requirement to tackle climate change under Section 10 (2)(n) of the Planning and Development Act, 2000.

The wording of amendment no. 37 implies, however, that the LAP will include an objective for the preparation of a local transport plan, rather than being informed by same. The Office strongly advises that any forthcoming local area plan for Sligo and environs should be informed by a Local Transport Plan (LTP) prepared in advance of, or in tandem with, the LAP consistent with RPO 6.27 of the RSES.

Terminology

Under Observation no.4, the Office sought greater alignment between the Sligo CDP and higher level plans in terms of the terminology used. The Office is disappointed that greater alignment could not have been achieved through the modifications, particularly in respect of the RSES prepared by the Northern and Western Regional Assembly, of which your authority is a member.

In the matter of the reference to Sligo as a city, the Office is fully supportive of your authority's ambition to continue Sligo's development as a vibrant place to work, live, study and visit, and an important driver for the economic and social development of the region. Indeed these ambitions are fully supported by both the NPF and the RSES.

Nevertheless, the statutory role of the Office is to ensure consistency between your development plan and the national and regional policy framework which clearly identifies Sligo as regional growth centre with a particular role in relation to the North West Corridor with Letterkenny and Derry. This is important because of the different planning policies which apply in this context, as opposed to those that apply to the five cities designated under the NPF.

Your authority will also be familiar with the provisions of section 10 of the Local Government Act 2001, as amended, in terms of the designation of cities.

In this context, the Office is of the view that there is scope to ensure that the terminology of statutory plans is clear and consistent with the NPF and RSES, without detracting from your authority's separate long term intentions to evolve into a city. This could be readily achieved by the inclusion of a statement to this effect in the foreword at the outset of the plan.



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Separately there were other terms and references in the county plan including '*key support towns*' and references to '*sub-region*' which we acknowledge will be revisited in the forthcoming plan review. This is welcomed by the Office.

In relation to these matters generally, the Office would make the point that the consistent use of correct language and 'technical' terms is important not just for the transparency of the planning process, but also for public understanding and engagement with the process. This will be particularly important as the authority commences the forthcoming development plan review process.

Conclusion

Adopted Variation no. 1, the purpose of which is to enable the incorporation of the NPF and the RSES into the development plan, is considered generally consistent with the recommendations of the Office.

There will be the opportunity for the planning authority to consider the aforementioned points in the forthcoming review of the Sligo and Environs LAP and the Sligo County Development Plan.

Please feel free to contact the Office through plans@opr.ie in the context of your authority's plan-making function and should you wish to discuss the issues above further.

Yours sincerely,

Anne Marie O'Connor

Deputy Regulator and Director of Plans Evaluations
