OPR Ref: DP-029-22



22nd December 2023 Sligo County Council, County Hall, Riverside, Sligo, F91 Y763.

Re: Draft Sligo County Development Plan 2024-2030

A chara,

Thank you for your authority's work in preparing the Draft Sligo County Development Plan 2024-2030 (the draft Plan).

The Office of the Planning Regulator (the Office) wishes to acknowledge the considerable work your authority has undertaken in the preparation of the draft Plan against the backdrop of an evolving national and regional planning policy and regulatory context.

As your authority is aware, a key function of the Office is the assessment of statutory plans to ensure consistency with legislative and policy requirements relating to planning.

The Office has evaluated and assessed the draft Plan under the provisions of sections 31AM(1) and 31AM(2) of the *Planning and Development Act 2000*, as amended (the Act), and this submission has been prepared accordingly.

Recommendations issued by the Office relate to clear breaches of the relevant legislative provisions, of the national or regional policy framework and/or of the policy of Government, as set out in the Ministerial guidelines under section 28. As such, the planning authority is required to implement or address recommendation(s) made by the Office in order to ensure consistency with the relevant policy and legislative provisions.

Observations take the form of a request for further information, justification on a particular matter, or clarification regarding particular provisions of a plan on issues



that are required to ensure alignment with policy and legislative provisions. The planning authority is requested by the Office to action an observation.

A submission also can include advice on matters that the Office considers would contribute positively to the proper planning and sustainable development of the area. The planning authority is requested by the Office to give full consideration to the advice contained in a submission.

Overview

The Office considers that the draft Plan generally sets out a well balanced approach for the future development of the county, with appropriate focus on the continued growth and development of Sligo Town as a Regional Growth Centre, and in a manner that promotes compact growth and regeneration.

The inclusion of a specific chapter which outlines how the draft Plan addresses the Regional Policy Objectives related to the Regional Growth Centre Strategic Plan in the Regional Spatial and Economic Strategy for the Northern and Western Region (RSES) also provides a strong framework to support the critical role of the town in the wider county and region.

The Office also strongly commends the planning authority's efforts to support regeneration which is evident from the approach in the draft Plan and the implementation of major regeneration projects including Cranmore Regeneration and public realm interventions such as O'Connell Street and Queen Maeve Square. The Office encourages the planning authority to further explore land activation measures with assistance from the Urban Regeneration and Development Fund along with other funding streams which will be critical for the enhancement Sligo Town's attractiveness and prioritisation of urban-led development.

The Office commends the planning authority for preparing a Local Transport Plan (LTP) which includes specific actions and measures to support the integration of land use and transport planning and active travel, including policy commitments to enhance the county's accessibility through sustainable transport measures, which in



turn respond to the need to reduce emissions from transport in respect of climate action.

The Office has identified a relatively small number of areas which require further consideration in order to more fully align the development framework for the county with current national and regional policies.

In this regard, the Office considers that there may be scope to direct additional population growth to Sligo Town to better reflect the population targets in the RSES and the need to develop a centre of scale.

The planning authority will also be aware of the need to address matters within the scope of section 10(2)(n) of the Act in relation to climate change. In this regard, the Office welcomes the inclusion of a dedicated chapter on climate action in the draft Plan. The Office notes that objective O-REN-1 commits to preparing a renewable energy strategy consistent with the *Sligo County Council Draft Climate Action Plan 2024-2029*. While this is welcomed, the Office considers that the strategy should be prepared within one year of the publication of the Methodology for Local Authority Renewable Energy Strategies and should include a review of the landscape character map. in the draft Plan. Further, it is considered there is scope for the draft Plan to include additional policy support and direction for renewable energy generation in appropriate locations.

The Office has also identified a number of issues relating to flood risk management which will need to be addressed prior to the adoption of the Plan.

Other matters raised by way of observations generally relate to minor matters that can be clarified or addressed through the plan process.

It is within this context the submission below sets out five (5) recommendations and seven (7) observations under the following 9 themes:

Key theme	Recommendation	Observation
Core strategy and settlement	Recommendation 1	Observation 1
strategy	Recommendation 2	



Housing strategy and relevant	Recommendation 3	Observation 2
policies		
Economic development and	-	Observation 3
employment		
Sustainable transport and	-	Observation 4
accessibility		Observation 5
Climate action and renewable	Recommendation 4	-
<u>energy</u>		
Flood risk management	Recommendation 5	-
Environment, heritage and	-	Observation 6
amenities		
Implementation and monitoring	-	Observation 7

1. Sligo Regional Growth Centre

The development of the Sligo Regional Growth Centre as a driver of growth in the region is a central objective the RSES and of the Sligo Regional Growth Centre Strategic Plan (SRGCSP).

In this regard, the Office welcomes the level of detail provided in Chapter 4 in response to the challenges and opportunities identified for the SRGCSP area. In particular, the draft Plan identifies strategic areas that have significant growth potential and where critical support infrastructure exists or is planned, including the Docklands, the Cranmore Regeneration Project, the Centre Block (Wine Street Car Park), the Courthouse Block and the Quay Quarter. The regeneration of these sites will be a catalyst for economic and residential regeneration for the north-west region.

The inclusion of a zoning map and objectives for Sligo Town is strongly welcomed and will provide a strong policy framework for the preparation of a future local area plan.

The Office is satisfied that the draft Plan provides a high level of consistency with the SRGCSP in the RSES.



2. Core strategy and settlement strategy

2.1 Housing and population targets

The Office considers that the total county population projections for the plan-period, as set out in Table 3.2 of the draft Plan, are broadly consistent with the population prescribed for the county in the RSES and the *Implementation Roadmap for the National Planning Framework* (2018).

The Office is generally satisfied that the housing supply target (HST) contained in Table 5.2 of the draft Plan is in compliance with the *Housing Supply Target Methodology for Development Planning, Guidelines for Planning Authorities* (2020). Notwithstanding, the Office considers that the HST figure for the plan-period should be reviewed as our assessment indicates that the figure may need to be adjusted upwards.

While there may be a need to revise the housing supply target, the Office notes from Table 3.2 that there is sufficient zoned residential lands to accommodate any minor adjustment, and that the rezoning of additional land would not be required. Furthermore, any additional HST increase should be directed to Sligo Town in the first instance having regard to RPO 3.7.37 and the transitional population target figure in Table 3 of the RSES.

The core strategy allocates 2,512 housing units or approximately 65% of the HST allocation to Sligo Town which is considered appropriate having regard to its designation as a Regional Growth Centre and to RPOs 3.1 and 3.7.38. While the draft Plan zones sufficient land to accommodate 2,952 units, the Office considers the overall zoning approach for residential development in Sligo Town to be acceptable.

In relation to population growth targets in the core strategy, it has a 2030 population target of 23,800 for Sligo Town, which is an increase of 3,192 persons. Table 3 of the RSES has a transitional population target of 26,000 people by 2031 and a population uplift of 8,000 people by 2040.

Since the core strategy's population target to 2030 would not reach the transitional population target for 2031 in Table 3 of the RSES, the Office considers that, there is



scope for the draft Plan to show more ambition in relation to population growth in Sligo Town, having regard to RPOs 3.7.37 and 3.7.38, and the further alignment with NPO 2b, NPO 2c and NPO 5.

The outcome of these changes would be to give greater effect to the draft Plan's stated core strategy guiding principles for compact growth and rejuvenation of the Sligo Regional Growth Centre, acting as an economic driver for the region, and also further improve alignment and consistency with regional policy objectives contained in the SRGCSP.

Recommendation 1 – Population and housing targets

Having regard to the:

- Housing Supply Target Methodology for Development Planning, Guidelines for Planning Authorities (2020);
- the population growth targets for Sligo Town under RPO 3.7.37 and RPO 3.7.38; and
- the transitional population target for Sligo Town in 2031 contained in Table 3 of the RSES,

the planning authority is required to review the housing supply target figures in Table 5.2 of the draft Plan in consultation with the Office and the Department of Housing, Local Government and Heritage.

The planning authority is advised that should the adjusted housing supply target figure increase, any additional surplus should be allocated to Sligo Town to provide for a greater level of population ambition to 2031 consistent with the Regional Spatial and Economic Strategy.

2.2 Settlement Hierarchy and distribution of growth

The proposed settlement hierarchy, including the identification of Sligo Town as the Regional Growth Centre, is consistent with the settlement typology approach set out



in section 4.5.1 of the *Development Plans, Guidelines for Planning Authorities* (2022) (the Development Plans Guidelines).

The Office acknowledges that the Regional Growth Centre designation is a key part of the *National Planning Framework* (NPF) strategy to build up stronger regions, with centres of scale that are more accessible and competitive, including at an international level.

The Office accepts the designation of Ballymote, Enniscrone and Tobercurry as Support Towns and second tier settlements in the settlement hierarchy. The Office agrees with the approach outlined in section 3.2.1 of the core strategy to provide *'…for consolidation, regeneration and a quantum of growth proportional to their current population and infrastructural capacity.* 'Moreover, the Office welcomes policy objective SP-S-2 which is consistent with NPO 18a and RPO 3.4 and will ensure that these settlements will serve this part of the north-west as an accessible centre of employment and services which can be a driver for investment and growth of regional scale and influence. The Office notes that collectively, the core strategy allocates 11.4% of the overall HST allocation to the three second tier settlements, which is considered appropriate in respect of their infrastructural capacity.

The third tier is occupied by the Satellite Villages of Ballysadare, Collooney, Coolaney, Grange and Strandhill. The Office agrees with the approach outlined in the core strategy, which is to *'carefully manage development, prioritising the provision of adequate service infrastructure, recreational and community facilities.'* In this regard, the Office acknowledges that the core strategy allocation for this tier is 370 units, which amounts to an average allocation of 74 units per village and is considered appropriate in light of the recent significant population increases and limited services.

The fourth tier contains the villages with special coastal tourism functions (a role shared with Enniscrone and Strandhill), and the core strategy supports the provision of adequate infrastructure for sustainable tourism development in these villages. In this regard, the core strategy allocates 70 units to this tier which amounts to an average allocation of 23 per village and is considered appropriate.



The fifth tier contains 19 villages sustaining rural communities and are supported through the core strategy to cater for limited local needs in terms of residential development. The sixth tier contains the unserviced villages and dispersed settlement in rural areas. The combined core strategy allocation for Tiers 5 and 6 is 495 units or 12.7% of the total and is considered appropriate.

From the evaluation undertaken by the Office, it is evident that the distribution of population growth across the settlement hierarchy generally reflects the policies and objectives of the NPF and RSES on compact growth and reversal of rural decline in villages, as set out in NPOs 3, 6, 7, 9, 16, 18a and RPOs 3.1, 3.2. 3.4 and 3.13.

2.3 Residential development – compact growth and sequential approach

Compact growth and the sequential approach to development are fundamental NPF policy objectives, highlighting the need to identify infill and brownfield opportunities to intensify housing and employment development within the existing built-up footprint of settlements. The approach for Sligo includes the potential to achieve more homes and jobs in the urban core of Sligo Town, and its support towns (Tier 2 settlements), through high quality and higher density mixed use development and continued support of existing services and infrastructure, thus facilitating people to live and work within reasonable distances.

The Office welcomes the inclusion in the draft Plan, of appropriate average residential densities for each town and village having regard to the NPF, the *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas: Cities, Towns & Villages* (2009) and subsequent *Circular Letter NRUP 02/2021*.

Moreover, the Office commends the planning authority's approach in section 3.3.2 of the core strategy setting out how the draft Plan proposes to address any excess of zoned lands for residential development consistent with the Development Plans Guidelines. In this regard, the planning authority has retained the most suitable (highest scoring) sites identified in the infrastructural assessment for future residential and mixed use development and designated such lands as settlement



consolidation sites. In accordance with the Development Plans Guidelines, less centrally-located lands with a live planning permission for residential development were designated as additional provision sites, which is welcomed.

The Office welcomes section 11.2.1 which, as recommended in the Development Plans Guidelines, lists the sites which have been selected to contribute to compact growth in Sligo Town and environs, together with their potential housing and population yields. This includes Settlement Consolidation Sites (SCS) and Additional Provision Sites (AP).

The Office welcomes that all SCS, infill and AP sites are located largely within the 2016 Census boundary for Sligo Town, and that over 50% of the potential housing yield can be delivered within the settlement's built up footprint, which exceeds the 40% requirement of RPO 3.7.39.

Further to the above, the Office also notes that there are two sites with a combined area of 81.5 hectares which have the potential for significant residential development to be built over a timescale greater than a single six-year development plan-period, and having regard to their strategic location and development potential. These lands are appropriately designated as Long-Term Strategic and Sustainable Development Sites consistent with the recommendations of section 4.4.4 of the Development Plans Guidelines.

The planning authority's overall approach to zoning and designation of lands for settlement consolidation, infill/ brownfield, and compact growth is considered acceptable and consistent with section 1.3.5 of the Development Plans Guidelines.

The Office welcomes the approach in the Support Towns of Ballymote, Enniscrone and Tobercurry which includes the identification of sites which would contribute to compact growth. The Office notes that all SCS sites and the AP sites are located largely within the 2016 Census boundaries for the three settlements and there is potential to accommodate in excess of the 30% requirement for future housing within the built up footprint consistent with RPO 3.2(c).



The Office notes that the draft zoning map for Grange zones a significant site as Strategic Land Reserve on the western approach to the village. The site is zoned Green Belt in the Sligo County Development Plan 2017-2023 and the infrastructure assessment indicates that the lands are not fully serviced. The lands would not promote compact growth or consolidation and are not required to meet the settlement's housing allocation. The Office considers that the Green Belt zoning should be retained for the forthcoming plan period.

Recommendation 2 - Zoning of land for Strategic Land Reserve in Grange

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

- section 10(2)(n) of the Planning and Development Act 2000, as amended, concerning the promotion of sustainable settlement and transport strategies;
- NPO 3c and RPO 3.2, compact growth;
- NPO 72a-c and associated NPF Appendix 3, tiered approach to zoning;
- the infrastructural assessment in Appendix A of the Draft Sligo County Development Plan 2023-2029; and
- the *Development Plans, Guidelines for Planning Authorities* (2022) in respect of the policy and objective for the sequential approach to zoning,

the planning authority is required to omit the Strategic Land Reserve zoning from the site on the L3203 on the western approach to the village and retain the Green Belt zoning.



2.4 Residential land use zoning – infrastructural assessment

It is an objective of the NPF that planning authorities implement a tiered approach to zoning (NPO 72a-c). The detailed requirements of this approach are set out under Appendix 3 of the NPF and are further elaborated upon under section 4.5.2 of the Development Plans Guidelines and supported by a policy objective. NPO 72a-c provides that where the zoning of land for development cannot be serviced within the lifetime of the plan, the lands should not be zoned for development.

The Office acknowledges that the planning authority carried out an infrastructural assessment of existing undeveloped zoned lands in towns and villages which have a land use zoning plan. The assessment helpfully considered the availability of service infrastructure and transport infrastructure that would allow the development of lands immediately or during the plan-period.

The Office notes that the outcome of the infrastructural assessment and settlement capacity audits confirmed that there is an excess of fully serviced, undeveloped, zoned land in Sligo Town and county. In the interests of achieving compact growth, the planning authority has retained the most suitable sites for future residential and mixed use development and designated same as SCS and in Sligo Town only which is welcomed.

The Office's assessment of the zoning maps for Sligo Town, Ballymote and Enniscrone notes some discrepancies regarding the maps in the infrastructural assessment as follows:

- lands zoned BIE at Ballytivnan and Finisklin, and zoned RW at Carrowroe in Sligo Town have not been categorised in section A.2 of the infrastructural assessment. These lands are all inside the development limit for Sligo Town and are only partly developed with remaining pockets of greenfield sites.
- there appears to be a discrepancy between the zoning map for Ballymote and the infrastructure assessment. Site IA7 has a SLR-2 compact growth designation and is shown inside the development limit in the infrastructure



assessment, however the site is zoned Green Belt and is located outside the development limit on the zoning map.

 the infrastructure assessment categorises the land south of the proposed new road corridor in Enniscrone as Tier 1, however the other larger site zoned Tourism and undeveloped is not categorised in the infrastructure assessment.

Observation 1 – infrastructure assessment maps

Having regard to the co-ordination of land use zoning, infrastructure and services, and in particular to:

- NPO 72a, NPO 72b and NPO 72c, tiered approach to zoning; and
- the *Development Plans, Guidelines for Planning Authorities* (2022), policy and objective for settlement capacity audits and associated infrastructural capacity assessment,

the planning authority is requested to:

- (i) review section A.2 of the infrastructural assessment to ensure that lands zoned for employment / retail uses in Sligo Town are categorised in terms of their serviceability; and
- (ii) review the zoning maps and maps included in the infrastructural assessment to ensure they are consistent with each other in respect of sites identified for development.

3. Housing strategy and relevant policies

3.1 Traveller accommodation

The Office welcomes the overall approach to Traveller accommodation in the draft Plan which includes two policies and one objective specifically relating to accommodation for Travellers and identifies specific locations on Map 2 – Sligo Town Draft Objectives Map. The Office considers that the requirements of section 10(2)(i) of the Act have therefore been adequately met.



3.2 Community and social infrastructure

The Office welcomes the community and social Infrastructure section of the draft Plan which has a key role to play in the creation of a healthy and inclusive community. The Office notes that the development of effective social and community infrastructure is supported through the zoning and strategic objectives included in the town and village plans. Furthermore, the Office understands that a flexible and supportive approach will be adopted towards proposals for community facilities on suitable sites within other zoning categories (e.g. Residential / Mixed Uses / Industry / Enterprise). The Office welcomes the intention to direct any such proposal to be locations within the development limits of settlements, which will support active travel and sustainable settlements.

That being said, the Office notes that the Community Facilities zoning permits a wide range of uses including, among others, schools, data centres, hotels, offices, light industry, and residential (apartment and residential – houses). The Office notes that the objective of the Community Facilities zoning is to *'Protect existing facilities or retain existing uses and provide for the establishment of new/additional community and institutional uses, such as schools, community centres, health centres etc.'*

In this regard, the Office considers that the range of uses normally permitted or open for consideration on the Community Facilities zoning should be curtailed especially regarding residential / commercial / employment uses to better reflect the intent of the zoning objective.



Recommendation 3 – Community Facilities: Land Use Zoning Approach

Having regard to the:

- the objective of the Community Facilities zoning;
- the range of uses normally permitted and open for consideration within the Community Facilities zoning as provided for in the Land Use Zoning Matrix in Chapter 10;
- National Strategic Outcome 10 Access to Quality Childcare, Education and Health Services; and
- section 6.2.1 of the *Development Plans, Guidelines for Planning Authorities* (2002) for zoning in the development plan,

the planning authority is required to review the range of uses normally permitted and open for consideration within the Community Facilities zoning and amend the land use zoning matrix to not normally permit uses which are incompatible with the primary objective of the zone such as residential and commercial / employment development.

Alternatively, the planning authority could provide an appropriate policy framework for the consideration of development proposals through the development management system.

As stated above, the core strategy provides a clear strategy for the growth of Sligo Town consistent with population and housing targets identified for the settlement in the RSES. In light of this, the Office considers it prudent to consult with the Department of Education regarding the potential need for additional schools to support the Plan's ambition for substantial residential growth across Sligo Town.



Observation 2 – School provision in Sligo Town

Having regard to:

- section 10(2)(j) of the *Planning and Development Act 2000*, as amended;
- National Strategic Outcome 10 Access to Quality Childcare, Education and Health Services;
- sections 2.5.1 and 6.2.6 of the *Development Plans, Guidelines for Planning Authorities* (2022); and
- the housing allocation for Sligo Town in the core strategy and its population and housing targets for the settlement in the RSES;

the planning authority is requested to review the need for school provision in Sligo Town in consultation with the Department of Education.

4. Housing and regeneration

4.1 Rural housing policy

The draft Plan recognises the long tradition of people living in rural areas in a highly dispersed rural pattern and the significant number of people who commute to Sligo Town for employment purposes.

The Office notes that section 5.5.1 of the draft Plan (Settlement Strategy) outlines the types of rural areas and policy provisions in respect of each. In this regard, the core strategy map makes a distinction between rural areas located within the hinterland of Sligo Town (rural areas under urban influence) and elsewhere (remote rural areas).

The Office welcomes the inclusion of a Green Belt zoning outside the identified development limit for settlements. Such an approach provides a clear focus for the consolidation of growth and a distinction from the open countryside while also reducing pressure for ribbon development on the periphery of settlements.

The rural areas under urban influence include the settlements such as Collooney, Strandhill, Ballygawley and Coolaney (among others). While the Office accepts the



southern extent of the rural areas under urban influence as presented on the core strategy map, the Office advises the planning authority to monitor rural housing activity in the area extending along the recently upgraded N4 national road scheme to Castlebaldwin.

4.2 Social and Affordable Housing

It is noted that strategic housing policy SP-HOU-2 includes a 20% requirement for social housing with no specific percentage requirement for affordable housing. The wording differs from the policy recommended in section 8.2 of the Housing Strategy which states:

Reserve 20% of eligible sites which are subject to new residential development (or a mix of uses including residential) for the development of social / affordable housing units, in accordance with the Housing Strategy and the requirements of Part V of the Planning and Development Act 2000 (as amended).

The planning authority is advised to review the above to ensure there is no inconsistency.

5. Economic development and employment

5.1 Employment zoned land

A significant number of the county's jobs are concentrated in Sligo Town and Environs which has become the county's centre for industry and enterprise, with a particular strength in the area of chemicals and pharmaceuticals.

The draft Plan correctly acknowledges that in order for Sligo Town to meet its population growth targets, further job creation and economic development will be required to support its role as a regional economic driver in the north-west. In this regard, the zoning map for Sligo and Environs provides strategic employment land at Oakfield and Ballytivnan the latter of which is accessible from the recently constructed Western Distributor Road.



Beyond Sligo Town and Environs, the Office notes that the towns of Tobercurry, Collooney and Grange, have developed a variety of smaller enterprises staffed by a local workforce including Strandhill which has a purpose built enterprise centre within relatively close proximity to the airport. The Office welcomes the policies outlined in Chapter 28 which relate to business, industry and enterprise, particularly policy P-BIE-1 to support the consolidation of existing business / enterprise parks through their extension and/or the provision of new enterprise centres in Ballymote, Enniscrone and Tobercurry in addition to Strandhill. The Office further welcomes policy P-BIE-3 which seeks to support the repurposing of vacant buildings in town centres for office-based enterprises.

5.2 Retail

The Office welcomes the retail development standards as well as the general principles in relation to assessing retail proposals and the sequential approach to retail development as set out in sections 33.5.2 and 33.5.3. Chapter 8 of the draft Plan sets out Sligo's Retail Strategy.

In relation to the Retail Hierarchy, County Sligo is considered 'mono-nodal' in terms of its retail offering largely concentrated in Sligo Town, which is placed on the Regional (second) tier. Beyond Sligo Town itself, the towns of Tobercurry, Ballymote and Enniscrone have some significance in respect of their retail provision given their location and role as support towns within the Settlement Hierarchy. The Office welcomes the indication as set out in the draft Plan which provides a comprehensive retail strategy.

On a minor point, there appears to be a discrepancy in the Land Use Zoning map regarding the appropriate zoning objective for Sligo Retail Park. In this regard, the planning authority should review and confirm what the proposed land use zoning objective is for these lands and accurately display this on zoning map for Sligo Town.



Observation 3 – Retail

The planning authority is requested to revise the Sligo Town Draft Land Use Zoning Map – Map 1 to ensure that the zoning objective for the Sligo Retail Park is accurately displayed on Map 1.

6. Sustainable transport and accessibility

The Office is satisfied that the draft Plan contains sufficient policy support for integrated land use and transport planning, active travel and measures to support reducing emissions related to transport. The Office supports the policies and objectives to protect the strategic transport function of the national road network and to implement the road projects identified as strategically important in the RSES, including the Eastern Garavogue Bridge and Approach Roads Scheme. The planning authority should ensure that these strategic routes are clearly identified on all zoning maps in the draft Plan for transparency.

Given the largely rural nature of the county and its extensive national road network, the Office considers that there is merit in providing a cross reference to policy P-NR-1, which seeks to protect the traffic carrying capacity of national roads, in section 26.4 (Housing in Rural Areas) and Chapter 28 (Economic Development). This would provide clarification and early assistance to applicants in the preparation of planning applications where there may be implications for the strategic national road network in the area.

The Office notes the Land Use Zoning map for Collooney shows a road corridor for the N17 road scheme, however, Chapter 13 – Collooney Village Plan does not include an associated strategic policy or objective regarding same. The Office advises the planning authority to include an appropriate policy / objective in Chapter 13 to reference the N17 Knock to Collooney Scheme and to safeguard the scheme pending its delivery.



Observation 4 – National Roads

Having regard to:

- National Strategic Outcome 2 Enhanced Regional Accessibility;
- Chapter 2 Development Planning and Roads of the Spatial Planning and National Roads Guidelines for Planning Authorities (2012); and
- Policy P-NR-1 of the Draft Sligo County Development Plan 2024 2030, which seeks to protect the traffic carrying capacity of national roads;

the planning authority is requested to:

- (i) provide a cross reference to policy P-NR-1 in section 26.4 (Housing in Rural Areas) and Chapter 28 (Economic Development) of the draft Plan; and
- (ii) include an appropriate policy / objective in Chapter 13 to reference the N17 Knock to Collooney Scheme and to safeguard the scheme pending its delivery.

The Office welcomes the preparation of an LTP in tandem with the preparation of the draft Plan. The Office supports the actions and measures set out in the LTP which reflect the planning authority's preferred transport infrastructure improvements and proposals over the plan period and Strategic Objective SO-TRA-5 which integrates these principles into the draft Plan.

It is considered however, that some positive aspects of the LTP, particularly the modal share aspirations in Figure 4-4 and performance indicators and target aspirations¹ (page 101) should be translated into policies / objectives in the draft Plan.

Further, the planning authority should consider translating further specific measures / proposals from the LTP into the draft Plan to give them statutory weight and clarity on the settlement zoning maps.

¹ Shift 10% of private car trips to alternative modes by 2027 increasing to 20% by 2030



Observation 5 – Integration of Local Transport Strategy

Having regard to:

- section 10(2)(n) of the *Planning and Development Act 2000*, as amended, concerning sustainable settlement and transport strategies;
- RPO 6.27 and 6.28; and
- National Strategic Outcome 5 on sustainable mobility, and NPO 27, NPO 54 and NPO 64,

the planning authority is requested to:

- (i) include policies / objectives in the draft Plan to translate the modal share aspirations in Figure 4-4 and performance indicators and target aspirations (page 101) from the Local Transport Plan (LTP);
- (ii) review the LTP and consider translating further specific measures / proposals from the LTP into the draft Plan to give them statutory weight and clarity on the settlement zoning maps; and
- (iii) provide an effective monitoring regime for the implementation of the planning authority's sustainable transport strategy and the modal share targets in particular.

7. Climate action and renewable energy

7.1 Climate action

The Office supports the Climate Action Framework set out in Chapter 2 of the draft Plan, which outlines the planning authority's commitment and obligations to address climate change in accordance with the *Climate Action Plan 2023* (Climate Action Plan).

The Office acknowledges the planning authority's commitment to prepare a Local Authority Climate Action Plan which is underway and the requirement for the draft Plan to align with the Local Authority Climate Action Plan. The Office welcomes Policy SP-CA-2 in this regard.



The Office also welcomes Table 2.1 Envisaged Climate Action effects of the Development Plan, which outlines the climate adaption and mitigation effects of the draft Plan provisions.

The embedding of climate action and the integration of climate mitigation and adaption measures through development management polices (Policy SP-CA-3) is also supported and welcomed by the Office.

7.2 Renewable energy

The preparation of the draft Plan provides an opportunity for the planning authority to demonstrate leadership on climate action and set out local roadmaps to deliver on national emissions reduction targets.

In this regard, the draft Plan should play a significant role in reducing the county's carbon footprint, through the creation of less energy and travel-intensive patterns of development, facilitation of energy generation from low carbon sources, and the adaptation of communities to the effects of climate change.

The planning authority will be aware that the Climate Action Plan Guidelines recently launched by the Minister for the Environment, Climate and Communications require planning authorities to exercise a strong link between spatial planning and positive climate action to ensure that land-use planning and development integrates considerations of adaptation and mitigation. In this respect, the Office welcomes the preparation of the Draft Local Authority Climate Action Plan 2024-2029 and the intent to prepare a renewable energy strategy.

While the Office welcomes the inclusion of a specific chapter on climate action and policies supporting renewable energy such as P-EN-2, the Office considers that additional policy and direction to promote a broad spectrum of renewable development is required, including in the core strategy and greater clarity in the development management standards (Chapter 33). The planning authority is advised that the Leitrim County Development Plan 2023-2029 provides a good example of a positive approach to climate action and renewable energy development.



The Office notes the identification of key issues and implications including the growing need to develop large renewable energy projects in Chapter 1 of the draft Plan. A Renewable Energy Strategy has not, however, been prepared as part of the draft Plan.

The planning authority will be aware of the forthcoming Methodology for Local Authority Renewable Energy Strategies which is due to be published in 2024. In this regard, the Office acknowledges the commitment to developing a renewable energy strategy for County Sligo during the lifetime of the draft Plan (Objective O-REN-1).

However, having regard to the urgent need to meet national targets for renewable energy under the Climate Action Plan, the Office considers that a firmer commitment to prepare the Strategy is required.

Furthermore, the Office notes that the landscape character map, which will inform the renewable energy strategy dates from 1996, and will also need to be reviewed as part of that process.

Recommendation 4 - Renewable Energy Strategy

Having regard to the national requirement for a sustainable renewable energy supply and the transition to a low carbon and climate resilient society, and in particular:

- section 10(2)(n) of the *Planning and Development Act 2000,* as amended;
- the importance attributed to climate action by Government policy, as evidenced by, inter alia, the recent *Climate Action and Low Carbon Development (Amendment) Act 2021*, the *Climate Action Plan 2023;*
- NPO 54 to integrate climate action into the planning system in support of national targets for climate policy mitigation and adaptation objectives, as well as targets for greenhouse gas emissions reductions;
- NPO 55 to promote renewable energy use and generation at appropriate locations;



- RPO 4.17 to position the region to avail of the emerging global market in renewable energy;
- the forthcoming Methodology for Local Authority Renewable Energy Strategies;
- the Development Plans, Guidelines for Planning Authorities (2022); and
- the Wind Energy Development Guidelines (2006),

the planning authority is required to:

- (i) amend objective O-REN-1 in Chapter 31 of the draft Plan to commit to the preparation of a renewable energy strategy for the county and to a variation of the County Development Plan to incorporate its recommendations into the adopted Plan within one year of the publication of the Methodology for Local Authority Renewable Energy Strategies;
- the landscape character map in the draft Plan which dates from 1996 should be reviewed in tandem with the preparation of the renewable energy strategy;
- (iii) include additional policies / objectives in the draft Plan which support a broad spectrum of renewable energy developments; and
- (iv) provide additional policy direction for renewable energy development in the draft Plan including the development management standards in Chapter 31 consistent with the policies and guidelines referenced above.

8. Flood risk management

The Office welcomes the preparation of a Strategic Flood Risk Assessment (SFRA) to accompany the draft Plan and the supportive policies and objectives to mitigate flood risk, including P-FRM-2 and P-FRM-5.

The Office also acknowledges and supports the identification of flood risk zones as a key informant to the land use zoning in the draft Plan. However, while site specific



maps have been illustrated in the SFRA to show which lands are at risk of flooding, these have not been overlaid on the land use zoning maps. It is difficult therefore to fully understand the implications of flood risk across the draft Plan area, and the planning authority is advised to overlay the future scenario mapping on the land use zoning maps in order to provide clarity on areas at risk from climate change.

In addition, there appears to be some errors in the transposing of the flood risk datasets into the Flood Zones such as small omissions of areas and the use of the incorrect probability extents. For example, the full extent of the flood risk area affecting the Business, Industry and Enterprise (BIE) lands at Ballytivnan does not appear to be shown. The planning authority should review and compare the flood mapping and the probability extents for all areas, in consultation with Office of Public Works (OPW) including specific sites at Ballinacarrow, Ballincar, Ballygawley, Ballymote, Ballysadare, Castlebaldwin, Cliffony, Geevagh, Gorteen, Grange, Rathcormac, Sligo Town, and Strandhill.

Recommendation 5 - Flood Risk Management

Having regard to flood risk management, and in particular,

- NPO 57 requiring implementation of *The Planning System and Flood Risk* Management Guidelines for Planning Authorities (2009) and integration of sustainable water management solutions; and
- RPO 3.10, flood risk management and integration of sustainable water management solutions,

the planning authority is required to:

- i. overlay the flood zones maps and future scenario maps with the land use zoning maps in the draft Plan; and
- ii. review and amend the flood zone maps to ensure the correct datasets and probability extents have been illustrated. In instances where the flood extents encroach into incompatible land use zonings, a Justification Test should be prepared in accordance with the Flood Guidelines. Where lands



fail to meet the criteria of the Justification Test, the planning authority must rezone lands for water compatible or appropriate uses only. Particular attention is required for the specific sites identified by the OPW including lands at Ballinacarrow, Ballincar, Ballygawley, Ballymote, Ballysadare, Castlebaldwin, Cliffony, Geevagh, Gorteen, Grange, Rathcormac, Sligo Town, and Strandhill.

The planning authority is advised to liaise with the OPW to address this recommendation.

9. Environment, heritage and amenities

The Office welcomes the inclusion a number of policies and objectives in the draft Plan for the protection and conservation of the county's built heritage including archaeological sites, architectural conservation areas and protected structures as set out in Chapter 24.

The Office welcomes the inclusion of Appendices B–H which include buildings of note, designated scenic routes, designated nature conservation areas, biodiversity sites, geological heritage sites, national monuments and public rights of way. In particular, the Office commends the planning authority for the inclusion of Appendix H as well as the associated mapping which clearly illustrates the public rights of way.

That being said, following a review of Appendix B Buildings of Note, there appears to be a discrepancy in the numbering for sites identified within the settlement of Ballysadare whereby BoN No. 7 appears to have been omitted from the schedule. It is therefore unclear if this is administrative error or if there is an additional building of note that has been left out of the associated schedule. In this regard, the planning authority should review the Buildings of Note schedule and ensure that all sites have been included and appropriately numbered in Appendix B.



Observation 6 – Built Heritage

Having regard to

- section 10(2)(f) of the *Planning and Development Act 2000*, as amended, concerning protection of natural and built heritage; and
- National Strategic Outcome 7 Enhanced Amenities & Heritage,

the planning authority is requested to review Appendix B to ensure that an accurate schedule of all Buildings of Note is included in the draft Plan and nothing has been omitted in error.

10. Environmental Assessments

The Office notes the preparation of the Strategic Environmental Assessment (SEA) and Natura Impact Report (NIR), attached to the draft Plan, in accordance with statutory requirements.

In relation to Appropriate Assessment, the Office notes the conclusion of the NIR, which states

Having incorporated mitigation measures into the Draft Plan, it has been demonstrated that the Draft Plan is not foreseen to give rise to any significant adverse effects to designated European sites, alone or in combination with other plans or projects.

With regard to the SEA, the structure of the report prepared is consistent with the guidance set out in the *Strategic Environmental Assessment, Guidelines for Regional Assemblies and Planning Authorities* (2022).

11. Implementation and monitoring

The Office notes that no provision has been made for monitoring the implementation of the draft Plan. The inclusion of a clear monitoring strategy of key plan objectives



will enable the planning authority to be more effective in implementing the draft Plan, including considering the obligations under section 15 of the Act.

The Office advises that implementation and monitoring would be best to focus on the anticipated or proposed key outcomes of the draft Plan, as determined by the planning authority, such the core strategy e.g. housing delivery and population growth in Sligo Town.

In this regard, section 10.3 of the Development Plans Guidelines sets out guidance on the best practice for meaningful monitoring of plan-implementation through core strategy monitoring and plan objective monitoring. The Office considers the approach taken in the Limerick Development Plan 2022-2028 to be good practice.

Observation 7 – Implementation and monitoring

Having regard to section 10.3 of the *Development Plans, Guidelines for Planning Authorities* (2022), the Office advises the planning authority to include a monitoring strategy for implementation of the draft Plan.

Summary

The Office requests that your authority addresses the recommendations and observations outlined above. As you are aware, the report of the chief executive of your authority prepared for the elected members under section 12 of the Act must summarise these recommendations and the manner in which they will be addressed.

In accordance with section 12(5)(aa), where the planning authority decides not to comply with any of the Office's recommendations made in the draft Plan and report, they shall inform the Office, by notice in writing containing the reasons for the decision.

At the end of the process, your authority is required to notify this Office within five working days of the decision of the planning authority in relation to the draft Plan. Where your authority decides not to comply with the recommendations of the Office, or otherwise makes the plan in such a manner as to be inconsistent with the



recommendations of the Office, the chief executive must inform the Office accordingly and state the 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 plans@opr.ie.

Is mise le meas,

C' Onne

Anne Marie O'Connor

Deputy Regulator and Director of Plans Evaluations