

North Western Regional Assembly
The Square
Ballaghaderreen
Co. Roscommon
F45 W674

07th February 2019

Re: Submission to Draft Regional Spatial and Economic Strategy for the Northern and Western Regional Assembly

Dear Sir/Madam,

McCutcheon Halley Chartered Planning Consultants have been requested by Walter & Margaret Burke, of Russborough, Caltragh, Sligo to prepare a submission to the Draft Regional Spatial and Economic Strategy (RSES).

Our Client welcomes the publication of the draft RSES and the opportunity to participate in the plan making process.

The importance of Sligo to the north-west region is highlighted at National policy level in the National Planning Framework (NPF) and this is underpinned by commitments in the National Development Plan (NDP).

*“Of course, our five cities are not evenly distributed across our three regions. The Northern and Western region, as well as part of the Midlands, are located beyond the hinterland of cities. As such, **Sligo and Athlone fulfil regional roles to a greater extent than elsewhere.**” (emp. added)*

Accordingly, National Policy Objective 2b of the NPF requires:

*“The regional roles of Athlone in the Midlands, **Sligo and Letterkenny in the North-West** and the Letterkenny-Derry and Drogheda Dundalk-Newry cross-border networks will **be identified and supported in the relevant Regional Spatial and Economic Strategy.**” (emp. added)*

The NPF also identifies compact growth as a priority for future development and sets a target of at least 40% of all new housing to be delivered within and contiguous to the existing built-up areas of cities, towns and villages.

The NPF and the NDP thus set out clear principles and goals: compact growth, higher housing and job densities and efficient use of lands. To achieve these, it is incumbent on the North West Regional Assembly to provide the appropriate policy direction in the forthcoming RSES.

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Subject Landbank

The subject lands are in Caltragh, Cornageeha and Carrowroe, in close proximity to Sligo Town. It is clear that the lands occupy a strategically advantageous location in the context of Sligo Town Centre and proximity to road infrastructure, being situated immediately adjacent to the N4 roadway. The completion of the Western Distribution Roads (now well advanced) will further enhance the site's connectivity in particular with existing and proposed employment areas including Finisklin Industrial Estate and the proposed IDA Industrial Estate in Oakfield. Critically, the subject lands are serviced with sewerage and storm water and potable water.

Sites 1, 2 and 3 are all located within 1.3km of the Sligo Town Centre a. Sites 1 and 2 may be described as urban infill sites and are located adjacent to established residential areas in Caltragh (including Rusheen Ard, Caltragh Heights/Crescent and Knocknaganny Park) and would be capable of supporting increased densities. Any potential development on these lands will be readily serviced by existing infrastructure. Site 1 had the benefit of a previous grant of planning permission for 64 no. houses (under planning reg. ref. 0070055) which expired in March 2006. Site 3 is the largest parcel within the subject lands comprising c. 27 ha. The site has significant potential for the delivery of residential led development. Based on an average of 35 units per hectare, some 945 residential units could be delivered.

Site's 4 and 5 are accessed via the existing local road network off the N4 and comprise an area of c. 26ha. As with Site 3, the existing topography and opening of the Western Distribution Road will open up these lands for development.

The entire landbank falls within the development limits of the SEDP 2010-2016. In response to the requirements of population and housing targets within the Border Regional Planning Guidelines 2010-2022, the Council adopted Variation No. 2 to the SEDP which rezoned 539 hectares to 'Strategic Land Reserve', including the subject landbank.

It is notable that the Sites 3,4 & 5 are located in an area designated within the SEDP as one of five areas where greenfield development, consolidation and regeneration was expected to take place at some point in the future.

The zoning and objectives contained in the SEDP are incorporated into the Sligo County Development Plan 2017-2023 and shall remain unchanged until the adoption of a new local area plan for Sligo and Environs.

Table 1 outlines the location and zoning of the subject lands within the current SLR, prior to the adoption of Variation No. 2 in 2011.

| Site | Location | Area | Zoning Prior to 2011 |
|---------------|---|-------------|--|
| Site 1 | Newtownholmes Road - Adjacent to Rusheen Crescent and Rusheen Ard residential estate (bound by N4 to west). | c. 3.3 ha | R3 - Medium/high density residential areas |
| Site 2 | Newtownholmes Road - Adjacent to Caltragh Crescent and Oak Lawn residential estate (bound by N4 to west) | c. 4.3 ha | R3 - Medium/high density residential areas |
| Site 3 | Caltragh – Site bound by N4 to east, proposed Western Distributor Road to north and railway to west. | c. 27.19ha | R3 - Medium/high density residential areas / MIX 1 – Mixed Uses (non-retail) |
| Site 4 | Caltragh – located to south of site 3 and west of the N4 | c. 6.79 ha | R3 - Medium/high density residential areas / MIX 1 – Mixed Uses (non-retail) |
| Site 5 | Carrowroe – site is bounded by N4 to east, residential dwellings to the south and | c. 19.02 ha | R2 – Low/medium density residential areas / MIX 1 – Mixed Uses (non-retail) |
| Site 6 | Carrowroe – site bound by N4 to west and R287 to east (adjacent to Sligo Retail Park). | c. 12.48ha | MIX 2 – mixed uses (optional retail warehousing) |

Table 1 Subject Lands within the Strategic Land Reserve (SLR)

It is imperative that the strategic nature of these lands is recognised within the forthcoming RSES to enable their development in a timely manner.

Re-instating residential and mixed-use zoning of the subject lands in the forthcoming *Sligo and Environs LAP* as envisaged in the SEDP 2010-2016 prior to Variation no. 2 in 2011, will help to provide a more appropriate range of residential densities in the locality and help to achieve the Council's core strategy, as well as broader regional objectives for Sligo.

Draft Regional Spatial and Economic Strategy

The draft RSES acknowledges that:

*"For our region this means that **our strategy must focus on the significant growth of the urban centres of Galway, Letterkenny, Sligo and Athlone...**"*

Sligo is designated as a 'Regional Growth Centre' within the settlement hierarchy of the draft RSES and the NPF. In line with this designation and having regard for the special recognition given to Sligo in the NPF as fulfilling a regional role *"to a greater extent than elsewhere"*, the draft RSES states that it is:

"Located at the point where the Western Region meets the Border Region, Sligo is one of the largest urban centres in the North-West, serving as an administrative, employment, commercial, health and education centre for significant hinterland that is substantially larger than the hinterlands of other towns with similar populations. Sligo's functional area extends far beyond the County boundaries, as demonstrated by the thousands of people who travel daily for work from Mayo, Donegal, Roscommon and Leitrim (the population of Sligo and surrounding counties exceeds 400,000). It has been estimated that the daytime population of Sligo RGC can be as high as 40,000."

Thus, the strategic importance of Sligo to the successful functioning of the wider region is acknowledged and this further highlights the importance of ensuring that future expansion can be accommodated in a timely and coordinated manner.

The draft Strategy states:

"It is recognised that the move towards the full implementation of the NPF shall take time to cascade down through the RSES and Development Plan process. Population projections at County and Metropolitan level have been provided in the publication of 'Project Ireland 2040 Implementation Roadmap for National Planning Framework, DHPLG July 2018' and they should provide sufficient scope to enable Development Plans to be reviewed, land zonings to be prioritised and Local Area Plans and planning permissions to be worked through. This allows for agility and ambition to be maintained, as well as facilitating ongoing monitoring and review, as we move towards full implementation of the NPF and NDP."

Our clients are concerned that there will be a significant time lag in the move toward full implementation of the NPF and RSES, as Local Authorities seek to interpret national and strategic planning policy. Although strategic policy is overwhelmingly supportive of the development of their lands in the short term, there are real concerns that the policy direction is not sufficiently specific to enable prompt delivery of the policy objectives.

According to Census 2016 the population of Sligo is 19,200. With a 40% targeted growth over the life of the plan this will bring the population to almost 27,000 by 2040, an increase of 7,700 people. In the shorter term, the proposed population uplift is 3,150 to 2026 and 4,750 to 2031. It is crucial that this ambitious growth can be realised in a sustainable manner and to achieve this there needs to be appropriately located zoned lands available.

In keeping with the regional significance and proposed expansion of the town, the draft RSES reiterates the bold vision outlined in the Local Economic and Community Plan for Sligo to be “*an enterprising, inclusive, resilient and environmentally sustainable place, which values and celebrates its unique landscape and rich culture and heritage, and where the wellbeing of future generations is central to everything we do*”.

The draft Strategy claims that this vision can be realised through implementation of a series of ‘high level goals’ and ensuing ‘high level objectives’. To achieve the goal of a ‘Compact Centre’, it contains objectives of regeneration and consolidation (CC-1) and planned expansion (CC-2).

The subject lands are ideally located to ensure that these high-level objectives can be realised. The development of our client’s lands, given their location immediately adjoining Sligo Town and existing residential estates, particularly Sites 1, 2 and 6 would successfully consolidate the exiting built area in accordance with CC-1. The remaining lands, Sites 3, 4 and 5, would ensure logical and orderly expansion of the town, consistent with CC-2.

The subject lands are located within and close to the Sligo neighbourhood of Caltragh. The draft RSES recognises the importance of this neighbourhood to the future development of Sligo and Environs, stating that “*within a short walking distance of the urban core there are opportunities to expand and create sustainable communities in Caltragh..*”.

The draft Strategy specifically nominates Caltragh as being a location for the future provision of 3,500 new homes. This aspect of the policy is consistent with our client’s belief that their lands are ideally located to meet this demand in terms of their proximity to Sligo Town and their existing and future service capacity. This sentiment is further reinforced by the draft RSES which explicitly identifies the area within which our client’s lands are located as a strategic site for residential and mixed development:

*“The Sligo and Environs Development Plan 2010-2016 estimated that **the larger Caltragh-Carrowroe area** could accommodate an additional population of over 11,000 people. However, the development potential of the area has always been dependent upon the provision of another major piece of infrastructure – the Western Distributor Road and associated works. It is now anticipated that the Western Distributor Road will be completed in early 2020, **thereby significantly improving the development potential of these lands and potentially allowing the release of additional lands from the Strategic Land Reserve**. The associated works will include upgrading of the water and wastewater infrastructure in the area.”*

Our client welcomes the recognition of this area (and their lands) as a strategic site for development and the suggestion that the lands be released from the ‘Strategic Land Reserve’. However, given the strategic importance of these lands to the future expansion of Sligo Town and to wider regional growth objectives, it is considered that the draft Strategy should be clearer in its direction to the Local Authority regarding the timely release and rezoning of lands in this location. These regional considerations coupled with the current national housing crisis and pent up demand for housing within Sligo Town, mean it is essential that the NWRA seize this opportunity to provide certainty on this policy matter through the draft RSES.

Sligo County Council have acknowledged within their development plan that the spatial distribution and ownership of zoned land within the SEDP area, combined with a shortage of financing, have not been conducive to development, despite a sustained demand for new houses in the Sligo area.

Figure 3 illustrates the subject lands in the context of existing residential and mixed-use zoning. This indicates a sporadic distribution of small residential zoned sites (specifically with low to medium zoning objectives) to the south east and north of Sligo City. All existing zoned residential sites and SLR sites must be evaluated in the context of where best housing provision may be located in terms of existing infrastructure, services, amenities and where clear intentions exist for the timely development of available zoned lands.

We submit that the subject lands are more appropriately located than many of the existing zoned residential sites and offer the opportunity to provide a significant number of residential units within a single landbank thereby ensuring the prompt delivery of housing during the lifetime of the draft RSES.

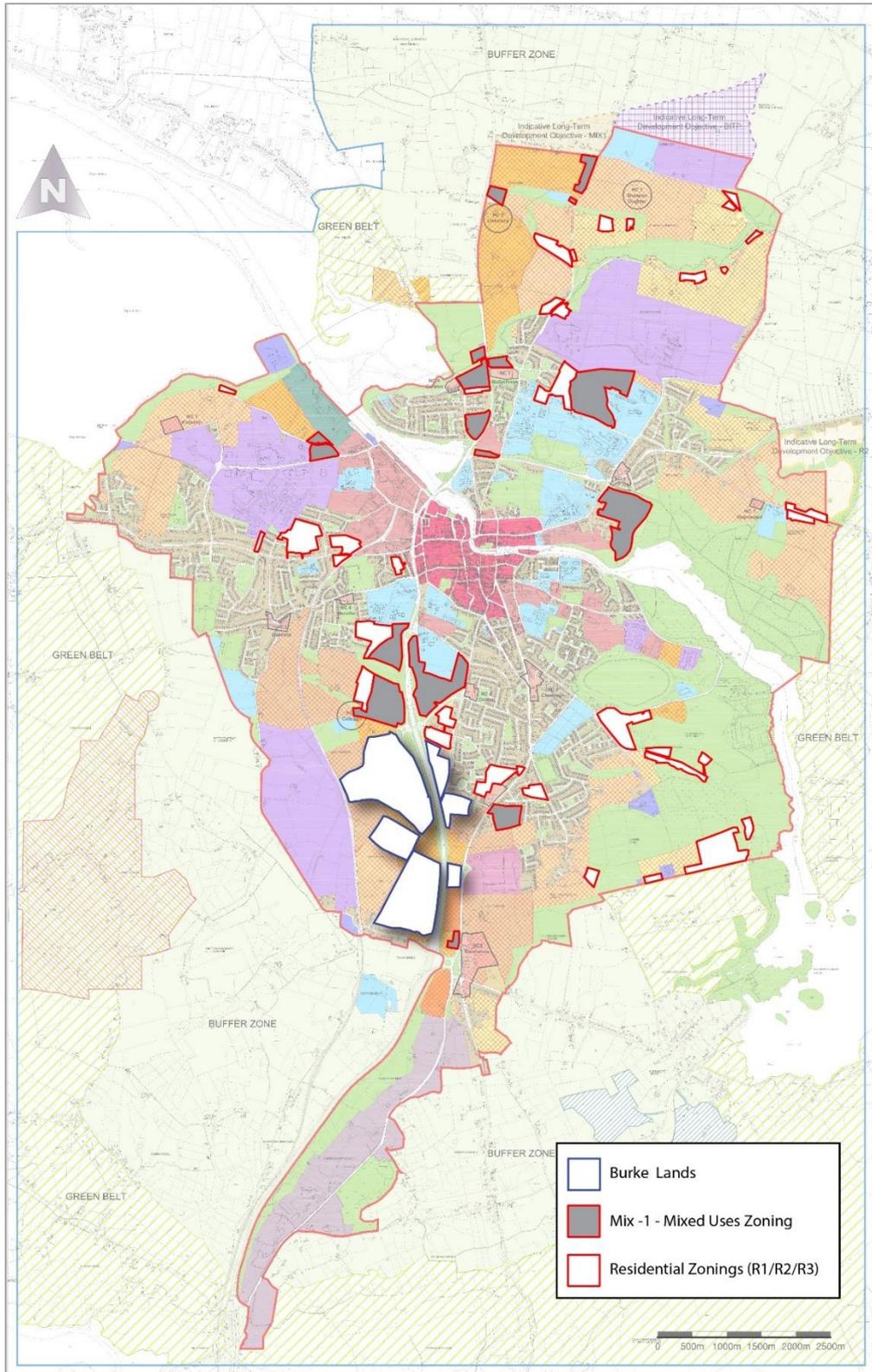


Figure 3 Subject lands in the context of existing Residential & Mixed Use Zoning

To ensure the timely delivery of new development and in particular residential units within Sligo Town we propose that the forthcoming RSES should put greater emphasis on the implementation phase of the strategy and particularly on the concept of “active land management” as recommended by the Government’s Planning Policy Statement, 2015.

*“Plan implementation is key and the national strategy for the construction sector seeks to enable planning authorities to more dynamically lead and manage the development process in their areas, **ensuring that land zoned for development actually comes into use as anticipated in development and local area plans and in tandem with supporting infrastructure...**”(emp. added)*

Our clients wish is to immediately develop their landholdings subject to an appropriate zoning and for the initial phase to consist of much needed residential accommodation. In our opinion this approach deserves the support of the NWRA to realise its strategic regional vision and objectives for Sligo, a key Regional Growth Centre.

Conclusion

The draft RSES clearly recognise the strategic importance of Sligo Town to the future growth of the north and west region. To enable Sligo to realise its full potential as a Regional Growth Town and to accommodate forecast population growth for the town and its environs, appropriate lands must be identified and zoned for the delivery of housing.

The subject lands offer significant attributes to allow the implementation of national and regional objectives;

- There is a need to zone additional lands for residential development within Regional Growth Centres to address the current shortfall of appropriately zoned residential land in strategic locations in close proximity to large town centres;
- To complement the existing residential developments in the area, particularly the adjoining housing development to the east of the subject sites;
- Realise the potential of lands in the nuclei of Sligo Town that are eminently suitable for residential development (the sites are within walking distance of the town centre);
- The area where the subject lands are situated represents the logical location for the expansion of Sligo Town, having regard for existing housing developments and nearby retail and employment uses;
- All sites have excellent access to public and national road infrastructure via existing established infrastructure and the soon to be completed Western Distribution Road;
- Development of the subject lands will have no significant environmental impacts;
- The rezoning of the subject lands would be consistent with Sligo CDP Core Strategy and the draft RSES;

The potential of our Client’s landbank is constrained by the current ‘Strategic Land Reserve’ designation. The forthcoming RSES offers a significant opportunity to provide clear direction for the identification of suitable lands, including our client’s landholding, that will accommodate the future expansion of Sligo Town, relieve current housing pressures and ensure strategic regional objectives are met.

The location of the subject lands adjacent to the existing developed area of Sligo Town mean that their development would be consistent with the principles of consolidation and compact growth that underpin the NPF and the draft RSES. Having regard for the overarching strategic objectives of urban consolidation and planned expansion for the Regional Growth Centre of Sligo, as detailed in the draft RSES, it is our view that the subject lands are ideally located to realise these aims.

Our clients welcome the inclusion of the Caltragh and Carrowroe neighbourhoods as locations for future development within the draft Strategy as necessary to the orderly expansion of Sligo Town. However, the importance of appropriate land management and prioritisation for effective housing delivery is also vital. We

therefore recommend that the draft Strategy be amended to explicitly identify appropriate, available lands that should be released and rezoned for residential and mixed-use developments, including the landholdings of Walter and Margaret Burke.

Our client's lands are situated in an area which is likely to experience significant development pressure shortly, particularly with the advent of the new Western Distributor Road. Logical extension of the urban area needs to occur in a timely manner, particularly incorporating those specific lands which are capable of providing sufficient numbers of housing units and mixed-use development within the lifetime of the draft RSES.

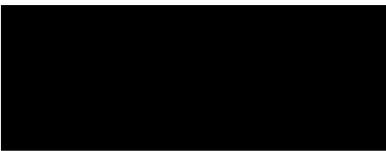
Our clients and their representatives would be willing to work with and engage with the NWRA and Council to ensure that their lands can be made available within a timeframe that is responsive to the strategic objectives for the region and satisfy the current demand for housing in the locality.

The draft RSES should be revised to support the removal of our client's lands from the 'Strategic Land Reserve' to allow for rezoning to their former residential and mixed-use zoning.

We also recommend that the draft RSES adopt the concept of "active land management" which will ensure that land zoned for development actually comes into use as anticipated and that appropriate lands are available to serve existing and future housing demand, consistent with its strategic objectives.

We trust that our submission will be taken into account as part of the consultation process in the formulation of the upcoming RSES. Our Client thanks you for the opportunity to engage with the Assembly in relation to these matters and trust that due consideration will be given to the issues raised herein. Should you have any queries please do not hesitate to contact the undersigned.

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Paula Galvin

McCutcheon Halley Chartered Planning Consultants