



Siobhan Gillen
Administrative Officer
Planning Section
Sligo County Council
City Hall, Quay Street
Sligo.

Via email: Planning@sligococo.ie

17/11/2023

RE: PROPOSED MATERIAL CONTRAVENTION OF THE SLIGO COUNTY DEVELOPMENT PLAN – RESIDENTIAL DEVELOPMENT (137 RESIDENTIAL UNITS), SECOND SEA ROAD, KNAPPAGH MORE, SLIGO

Dear Ms Gillen,

I refer to your notification on 18 October 2023 concerning the Proposed Material Contravention of the Sligo County Development Plan 2017 – 2023 (SCDP 2017-2023).

It is set out in the associated documentation that the development, if permitted, would contravene materially the following Strategic Land Reserve Policy of the SCDP 2017-2023 (INCORPORATING THE Sligo & Environs Development Plan (as varied):

PSLR2: *Restrict residential development on lands included in the CLR during the lifetime of the SEDP 2010 – 2016 except for one off housing in cases of genuine rural generated housing need which comply with the criteria set out in Sec 7.2.5 of the Plan.*

Sligo is a designated Regional Growth Centre, as set out in the RSES, and it has been identified for accelerated population and jobs growth. The NWRA's recent RSES 2 Year Monitoring Report identified that there is ongoing under-delivery in terms of residential units being developed and Census 2022 figures further illustrate this. Population growth in line with that forecasted within the RSES is running at approximately 30% of the targeted ambition. Sligo County Council have identified a lack of housing supply delivery as a critical issue to be addressed. The Draft Sligo CDP 2024 – 2030 (now at consultation stage) contains detailed commentary and measures to address this underperformance. It is noted that the site is zoned in the Draft Plan as Strategic Residential Reserve. The planning authority should reconcile why the draft LAP proposes to designate this site as 'Strategic Residential Reserve' but are at the same time considering to materially contravene the current plan to facilitate it.

RSES policies which are of particular relevance to this application include:

- Overarching Environmental Regional Policy Objectives (Rf. Page 13 of RSES)
- RPO 3.2(b) 40% of new housing to be within the built up area of Regional Growth Centres.
- RPO 3.7.37, Grow Sligo to 27,200 by 2040.
- RPO 3.7.38, Provide 3,000 – 5,000 new residential units.
- RPO 3.7.39, Provide at least 40% of new houses within the built up area of Sligo, through infill / consolidation.
- RPO 3.10 Ensure flood risk management informs development by avoiding inappropriate development in areas at risk of flooding and integrate sustainable water management solutions to create safe places.

Whilst this development is perhaps not readily described as compact growth, nor it is a straightforward case of an infill or consolidation of the existing built-up footprint of Sligo, it is contiguous to the existing residential neighbourhoods to the South, and to a lesser extent the East. There is, however, scope within Regional Policies to develop Residential communities outside of these parameters, and this is apparent from the wording of RPO 3.2 (b), and RPO 3.7.39.

It is noted that the development is in proximity to the coastline and Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC and Cummeen Strand SPA. Therefore, the planning authority should satisfy itself that the development is consistent with the overarching environmental RPOs of the RSES and that, in terms of flood risk, it fully satisfies RPO 3.10.

I trust that the above is of assistance in considering the merits of this application, within the context of the RSES, and that it clarifies the Assembly's position.

Kind regards



Denis Kelly
Director