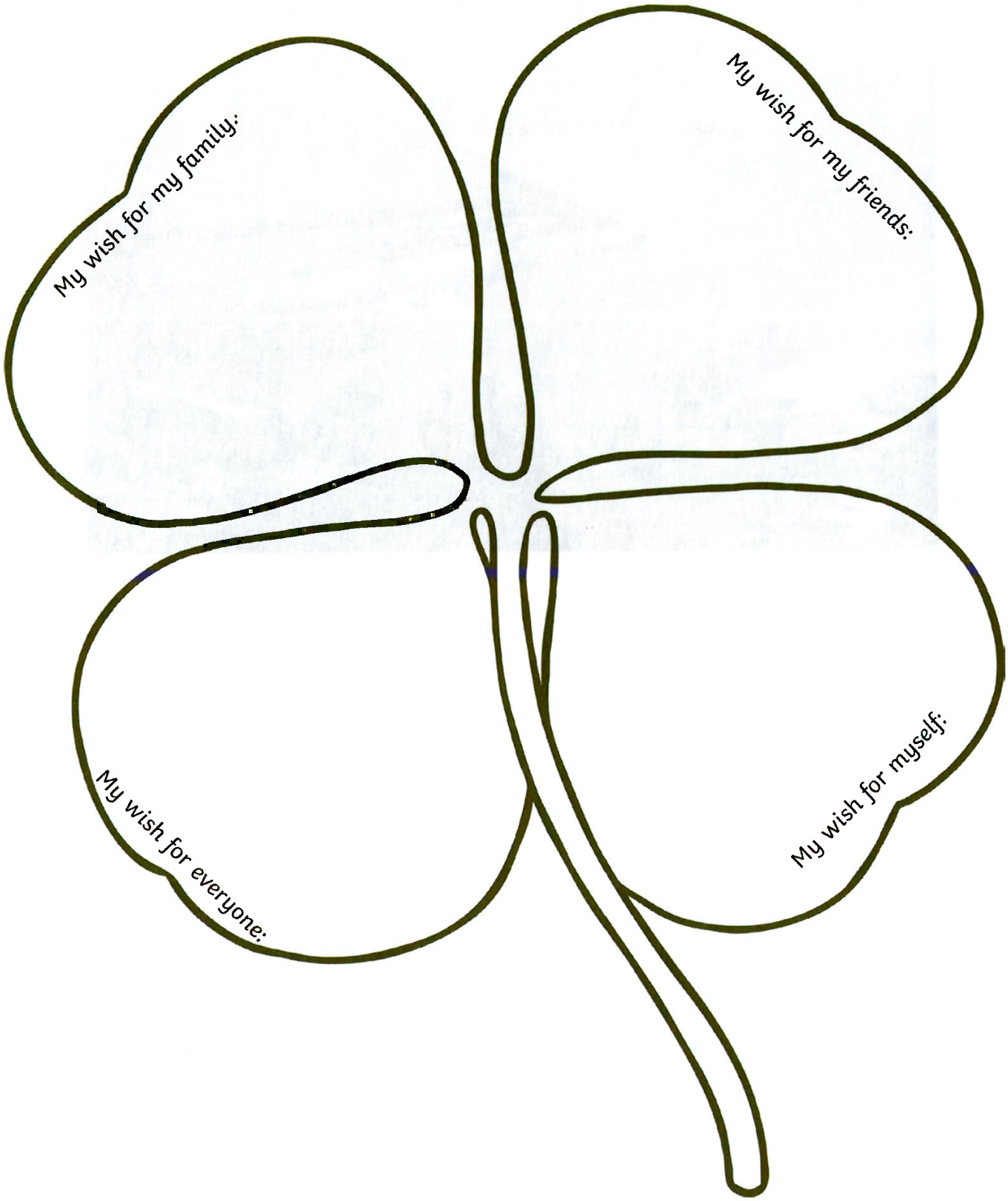
Wishing on a Lucky Clover





https://www.facebook.com/search/top/?q=neil%20byrne – posted today 10/1/2022 FACEBOOK

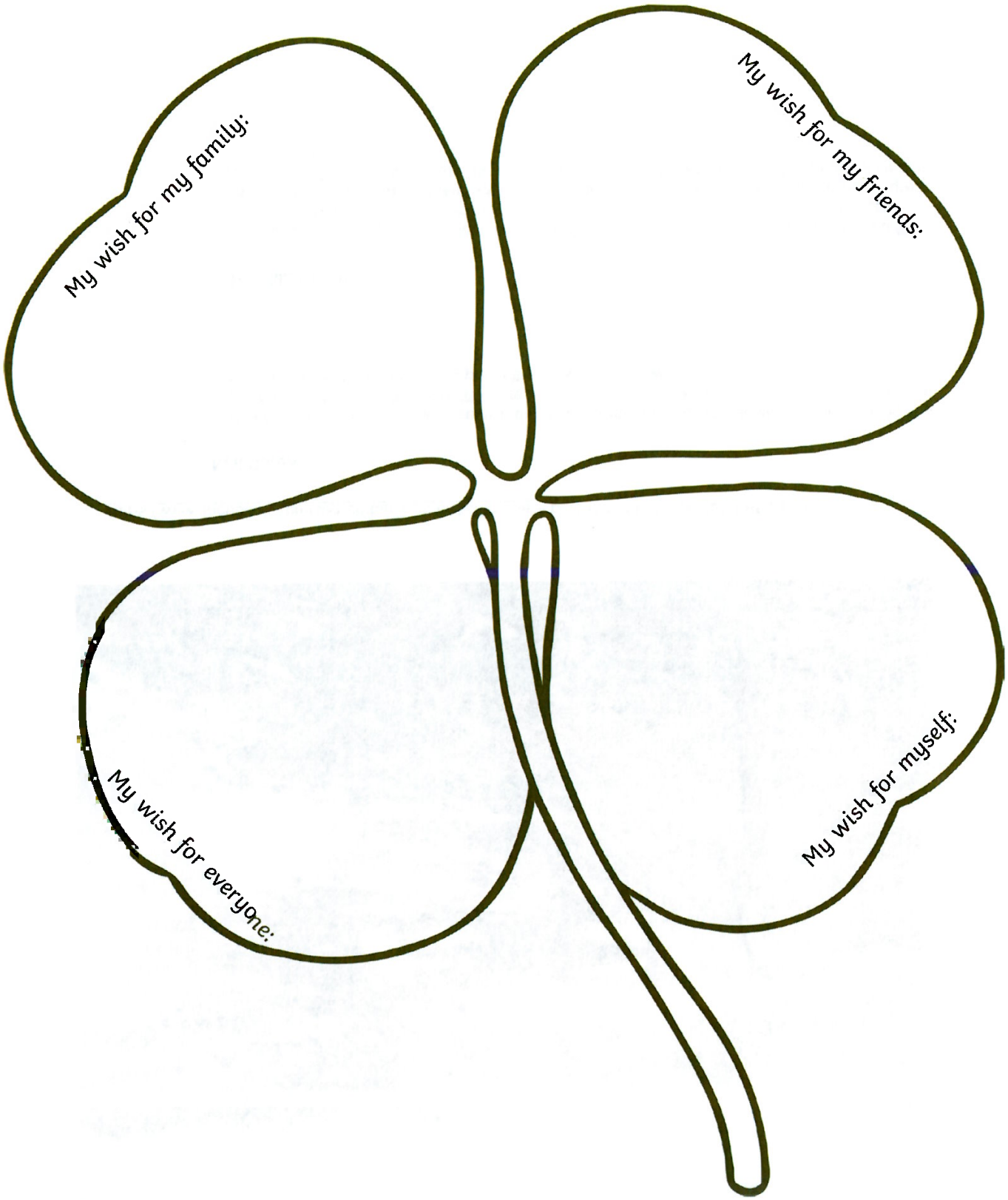
○ **Neil Carew**

When are the council going to realise that Rock Armour is the only answer to this erosion. It's a proven fact around the world!!! Yet reports upon reports and surveys will be done costing a fortune and in the end they will put in the rocks but only whe…

Tom Macsharry

As you know Neil, I put in a motion calling for Rock Armour at your request and others a few years back!! I was told last year to wait for a survey and I said that if urgent action was not taken then or immediately there will not be a coast line to survey??? I think there was a great job done at Rosses Point with rock armour! Which hopefully will protect and save that stretch of coastline! ☝

Wishing on a Lucky Clover



TM "tom macsharr... 15/01/2021

Motion for the Febraury Ordinary meeting

"That Sligo County Council assess the damage done to the fencing and walkways at the Dunnes on Strandhill beach as a result of Coastal erosion"

Neil Byrne

Tom Macsharry yes Tom you are correct the problem is getting everybody to agree

Tom Macsharry can you please research rock armour. This is not going to solve the problem. It just pushes the problem further along. Really outdated method at this stage.

Neil Carew

Tom Macsharry Hi Tom, can I ask what is the up to date position on these surveys and what the timescale is? Time is rapidly running out here. Action needs to be taken immediately

Jonathan Mark Carter

Neil Byrne Caravan park must be endangered at this stage. Council did a huge job in Rosses Point last year with rocks. Why are we being ignored in Strandhill?

Gary Devins

Jonathan the council didn't do it, the golf club members raised over €700,000 themselves and employed contractors to do it. The council only did structural safety works to the walkway

Neil Byrne

Gary Devins The golf course in Rosses point is private land, The land that we are talking about in Strandhill is public land belonging to Sligo county council

Jonathan Mark Carter

Gary Devins . The Golf Club paid one contractor to install rocks on their sea frontage. Another 40/50 metres was done on behalf of the council by a different contractor.

Jonathan Mark Carter

In the short term something really does need to be done.

Neil Byrne

Well said , we are losing about 2 m a year off the Sand dunes

Corinne Rushe

The problem is when rock armour is put in place you have people giving out about how its affecting the beauty of the landscape and how its unsightly etc! It's badly needed or there will be nothing to look at!

Neil Byrne

Corinne Rushe you've hit the nail on the head

An Na

Corinne Rushe unfortunately rock armour can make erosion worse further down the coastline. It diverts the wave energy down the shoreline and increases erosion in those areas. This process is clearly visible in strandhill either side of existing rock ar...

Ingrid Lally

I wonder is the rock available locally? Would the quarry nearby be suitable? Costs could be kept minimal if everything kept local and council supply labour and machines, which they may already have in the depot.

Noel Joseph

Soon there won't be a caravan park!

Stan O'Grady



Stan O'Grady



Tom Macsharry

Whorl Snail Monitoring 2025 1/2

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Front cover, from left to right and top to bottom:

A deep water fly trap anemone *Phellactis* sp., Yvonne Leahy; **Common Newt** *Lissotriton vulgaris*, Brian Nelson; **Limestone pavement**, Bricklieve Mountains, Co. Sligo, Andy Bleasdale; **Garden Tiger** *Arctia caja*, Brian Nelson; **Violet Crystalwort** *Riccia huebeneriana*, Robert Thompson; **Coastal heath**, Howth Head, Co. Dublin, Maurice Eakin; **Meadow Saffron** *Colchicum autumnale*, Lorcan Scott

Bottom photograph: **Desmoulin's Whorl Snail** *Vertigo moulinsiana*, Charleville Lake, Co. Offaly, John Brophy

Vertigo Angustior

Monitoring of three Annex II species of *Vertigo* snail on Irish sites (2022-2024)

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Department of Housing, Local Government and Heritage, 90 North King Street, Dublin 7, D07 N7CV

Pg 19 - highlights impact of WWTPs

Killaspugbrone Trail Anthropogenic impact

Mr. and Mrs. Thomas Monaghan

request the pleasure of your company

at the Inauguration of

Ave Maria College

on the Feast of the Immaculate Conception

Eight o'clock in the morning

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Executive Summary

All three *Vertigo* species listed in Annex II of the EU Habitats Directive (92/43/EEC) and present in Ireland were surveyed over a three-year period (2022-2024). These surveys were carried out in order to gather the information needed to prepare National Conservation Assessments for the three species for submission to the European Commission, as required every six years. The three species are the Narrow-mouthed Whorl Snail (*Vertigo angustior*), Geyer's Whorl Snail (*Vertigo geyeri*) and Desmoulin's Whorl Snail (*Vertigo moulinsiana*). The 2022-2024 surveys fell within the 2019-2024 Article 17 monitoring period. This is the third round of monitoring that has been carried out for these species, with the previously completed monitoring having been for the periods 2007-2012 and 2013-2018.

During this most recent monitoring period, 60 monitoring sites within the Republic of Ireland were surveyed for the target species. These comprised 20 sites for *V. angustior*, 19 for *V. geyeri* and 21 for *V. moulinsiana*. With the exception of three new *V. moulinsiana* sites, all the survey sites had been surveyed during at least one of the previous monitoring periods.

The survey revealed that the number of sites positive for *V. angustior* has declined by six since the previous round of monitoring, while *V. geyeri* was recorded from seven fewer sites and *V. moulinsiana* was recorded from one additional site (excluding the three new sites).

Of the 20 *V. angustior* sites visited, the overall conservation assessment status has declined at seven since the previous round of monitoring. For *V. geyeri*, a decline was noted for six sites and an improvement noted for one. In the case of *V. moulinsiana*, there was a decline at four sites and an improvement at one.

A range of pressures were recorded at the sites that are considered to be affecting their conservation status. The treatment of threats and pressures in this site-based report is more detailed than that in the Article 17 National Conservation Assessments for the three whorl snail species, which concentrate, by necessity, on the overall national situation for each species and deal with the threats and pressures that are significant at a national level. The main pressures include grazing intensity, hydrological changes resulting in drying out or fluctuating water levels (possibly due to climate change, or to other local factors) and drainage. While grazing can have positive effects depending on the species (*V. geyeri* in particularly benefits from a moderate level of grazing, particularly by sheep), drying out of habitat has negative effects for all three species.

While positive pressures were noted for several sites, these were generally incidental benefits from existing land-uses (*e.g.* agricultural grazing). Occasional conservation measures directed at improving the habitat at *Vertigo* sites were aimed at the general habitat rather than specific measures for the relevant *Vertigo* species. Such measures included the installation of chestnut fencing at sand dune sites, farm plans managing grazing levels, native invasive species control and conservation grazing. A notable example of conservation measures achieving positive effects for a *Vertigo* site is VgCAM08 Sheskinmore, which has seen improvements to the site for *V. geyeri* leading to its overall conservation status becoming Favourable (green) from Unfavourable-Inadequate (amber) after the 2013-2018 round of monitoring. At this site, conservation grazing has been undertaken and the water levels of Sheskinmore Lough controlled using a sluice at the outflow.

The continued decline in overall conservation status of the *Vertigo* species' sites is of considerable concern and active intervention will be required to address the decline and return the species to Favourable Conservation Status. While measures to reverse climate change are beyond the scope of any actions that can be initiated at a site level, the resilience of the sites may still be improved by other measures, such as applying an appropriate level of grazing or blocking drains. While the European Union Nature Restoration Law focuses on habitats, the required management and restoration of habitats including fixed dunes, alkaline fens and reed

and tall herb swamps in Ireland will have to take the needs of the three Annex II *Vertigo* species into account.

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1 Introduction

Of the four species of *Vertigo* listed in Annex II of the EU Habitats Directive (92/43/EEC), three are found in Ireland. These are the Narrow-mouthed Whorl Snail (*Vertigo angustior* Jeffreys, 1830), Geyer's Whorl Snail (*V. geyeri* Lindholm, 1925) and Desmoulin's Whorl Snail (*V. moulinsiana* (Dupuy, 1849)). Due to their presence in Annex II, Ireland is required to designate Special Areas of Conservation (SACs) for the conservation of these species. To date, 13 SACs have been designated for *V. angustior*, 13 for *V. geyeri* and eight for *V. moulinsiana*, with some SACs supporting two or more of the species. Furthermore, under Article 17 of the Habitats Directive, every six years Ireland is required to report on the implementation of the Directive, including the results of surveillance monitoring carried out for the relevant habitats and species.

Since the Habitats Directive came into force, Ireland has produced three Article 17 reports covering the periods, pre-2007 (NPWS, 2008), 2007-2012 (NPWS, 2013) and 2013-2018 (NPWS, 2019). Across these three reporting periods, the overall conservation status of *V. angustior* has been Unfavourable-Inadequate (with the trend qualifier of 'deteriorating' added for 2013 and 2019) (NPWS, 2008; 2013; 2019). For *V. geyeri*, the overall conservation status has dropped from Unfavourable-Inadequate in 2007 and 2013, to Unfavourable-Bad (deteriorating) in 2019 (NPWS, 2008; 2013; 2019). *Vertigo moulinsiana* saw a change from Unfavourable-Bad in 2007 to Unfavourable-Inadequate (deteriorating) in 2013 with this apparent improvement due to previously unknown populations being recorded, despite the deteriorating trend (NPWS, 2008; 2013). For 2019, the overall conservation status for *V. moulinsiana* remained Unfavourable-Inadequate (deteriorating) (NPWS, 2019).

The current survey was undertaken in order to collect up-to-date information on the populations of the three Annex II *Vertigo* species across Ireland. This information was used in preparing the National Conservation Assessments (NCAs) for the three Annex II *Vertigo* species, as required under Article 17.

2 Methodology

2.1 Site selection

Moorkens & Killeen (2011) surveyed a total of 21 sites for *V. angustior*, 22 for *V. geyeri* and 20 for *V. moulinsiana* in the monitoring period 2007-2012, with some sites supporting more than one of the target species. In the monitoring period 2013-2018, Long & Brophy (2019) carried out repeat surveys for 54 of the 63 sites surveyed by Moorkens & Killeen (2011), with three new sites added for *V. moulinsiana*, two for *V. geyeri* and one for *V. angustior*, which were discovered since the 2007-2012 surveys. Several sites were omitted due to the complete loss of the species and its suitable habitat at those sites, with other sites omitted as they were part of separate monitoring projects.

In the current project, 60 sites (in 52 locations) were selected for survey. The selection of sites was based on the historical list of sites for the target species, adding three new *V. moulinsiana* sites that were discovered since 2017. Again, several sites were omitted due to the complete loss of the species and its suitable habitat at those sites, or because they are part of separate monitoring projects.

The 20 sites surveyed for *V. angustior* in the current monitoring period are presented in Table 1, the 19 *V. geyeri* sites in Table 2, and the 21 *V. moulinsiana* sites in Table 3. All site locations are illustrated in Figure 1.

Table 1 List of *Vertigo angustior* sites surveyed as part of the current monitoring project. * = Sites where two of the species have been previously recorded. ** = Sites where all three species have been previously recorded

Site code	Site name	County
VaCAM01	Beal Point	Kerry
VaCAM02	Derrynane	Kerry
VaCAM03	Dooaghtry	Mayo
VaCAM04	Glencolmcille	Donegal
VaCAM05	Kilshannig	Kerry
VaCAM06	Kinlackagh Bay	Donegal
VaCAM07	Maharees	Kerry
VaCAM08	Dog's Bay	Galway
VaCAM10	Killanley Glebe	Sligo
VaCAM11	Lahinch	Clare
VaCAM12	Malin Dunes	Donegal
VaCAM13	Pollardstown Fen**	Kildare
VaCAM14	Streedagh Point Dunes	Sligo
VaCAM15	Bartraw	Mayo
VaCAM16	Inishmore Island	Galway
VaCAM17	Curragh Chase*	Limerick
VaCAM19	Louisa Bridge*	Kildare
VaCAM20	Ballysadare Bay	Sligo
VaCAM21	Strandhill Airport	Sligo
VaCAM22	Waterstown Lough**	Westmeath

Table 2 List of *Vertigo geyeri* sites surveyed as part of the current monitoring project. * = Sites where two of the species have been previously recorded. ** = Sites where all three species have been previously recorded

Site code	Site name	County
VgCAM01	Meenaphull	Leitrim
VgCAM02	Tievebaun	Leitrim
VgCAM03	Brackloon	Mayo
VgCAM04	Clonaslee Eskers	Laois
VgCAM05	Dooaghtry	Mayo
VgCAM06	Drimmon Lough	Roscommon
VgCAM08	Sheskinmore Lough	Donegal
VgCAM09	Annaghmore Lough	Roscommon
VgCAM10	Ballyness Bay	Donegal
VgCAM13	Easkey Valley	Sligo
VgCAM14	Polagull Bay	Donegal
VgCAM15	Silver River	Laois
VgCAM16	Fermoyle	Mayo
VgCAM18	Fin Lough (Offaly)*	Offaly
VgCAM20	Lisduff Fen*	Offaly
VgCAM21	Ox Mountains	Sligo
VgCAM22	Pollardstown Fen**	Kildare
VgCAM23	Waterstown Lough**	Westmeath
VgCAM24	Duleek Commons	Meath

Table 3 List of *Vertigo moulinsiana* sites surveyed as part of the current monitoring project. Sites not included in any previous monitoring surveys are underlined. * = Sites where two of the species have been previously recorded. ** = Sites where all three species have been previously recorded

Site code	Site name	County
VmCAM01	Borris	Carlow
VmCAM02	Fin Lough (Offaly)*	Offaly
VmCAM03	Lough Owel	Westmeath
VmCAM04	Mountmellick	Laois
VmCAM05	Louisa Bridge*	Kildare
VmCAM06	Ballybeg Lough	Clare
VmCAM08	Cappankelly	Westmeath
VmCAM09	Waterstown Lough**	Westmeath
VmCAM10	Ballynafagh Lake	Kildare
VmCAM11	Charleville Lake	Offaly
VmCAM12	Curragh Chase*	Limerick
VmCAM14	Kildallan Bridge	Westmeath
VmCAM16	Lisduff Fen*	Offaly
VmCAM17	The Murrough	Wicklow
VmCAM18	Poliardstown Fen**	Kildare
VmCAM19	Portumna	Galway
VmCAM21	Royal Canal, Longford Bridge	Longford
VmCAM23	Castletown	Waterford
VmCAM24	Gollierstown	Dublin
VmCAM25	Louisa Bridge (South)	Kildare
VmCAM26	Loughmerans	Kilkenny

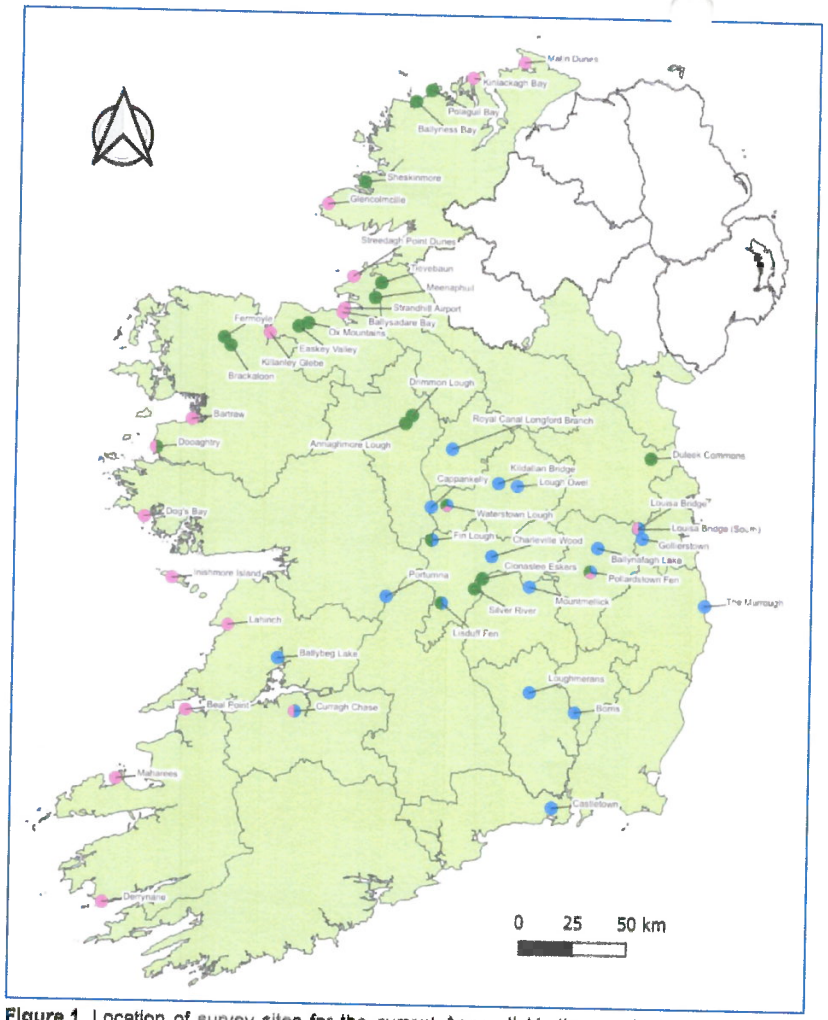


Figure 1 Location of survey sites for the current Annex II *Vertigo* monitoring survey. Pink indicates *Vertigo angustior* sites, green indicates *Vertigo geyeri* sites and blue indicates *Vertigo moulinsiana* sites. Note that some sites support more than one species.

2.2 Survey methodology

The survey methodologies for all three species followed those of Long & Brophy (2019) and, in the interest of brevity, will not be fully detailed here; however, deviations from that methodology will be set out.

1. During the current survey, full vegetation species lists and covers were not recorded from sample locations in Turboveg as it was by Long & Brophy (2019). Instead, a list of plant species present at each sample location was recorded in QGIS.
2. Data were recorded on ruggedized tablet running Android with QField, compared to the Trimble Nomad handheld computer running Windows Mobile with ArcPad used by Long & Brophy (2019).

For *Vertigo moulinsiana*, in order to maintain consistency, the vegetation classes established previously were used for existing sites, while those recommended in Section 4.4.9 of Long & Brophy (2019) were used for sites monitored for the first time during the current survey.

3 Results

3.1 Overview of results

The field surveys for the three *Vertigo* species were carried out over the summer and autumn of 2021-2024. The core field team comprised John Brophy and Orla Daly, with assistance from Jessica Hamilton and Jim Martin. The target species were recorded from 41 of the 60 sites surveyed. By species, this breaks down as 11 of 20 sites for *V. angustior*, 9 of 19 sites for *V. geyeri* and 21 of 21 sites for *V. moulinsiana*. A summary paragraph for each of the sites surveyed is presented in Appendix I.

At some sites, the broadly positive result masks a decline in the population and/or habitat at these sites. To understand the details of any given site, it is necessary to refer to the relevant species section within this report and the site reports presented in Appendices II-IV.

3.2 Vertigo angustior results

3.2.1 Vertigo angustior overview

Twenty sites were surveyed for *Vertigo angustior* across the field seasons 2022-2024. All 20 sites were previously surveyed by Long & Brophy (2019), with VaCAM22 Waterstown Lough added after Moorkens & Killeen (2011) discovered the species along with *V. geyeri* during 2007-2012 monitoring of *V. moulinsiana* at the site. *Vertigo angustior* was recorded from 11 of the 20 sites surveyed (Table 4).

Table 4 List of *Vertigo angustior* sites surveyed during the 2019-2024 monitoring period, and whether the site was positive or negative for the species in this round of monitoring and the previous two rounds

Site code	Site name	2007-12	2013-18	2019-24
VaCAM01	Beal Point	Positive	Positive	Positive
VaCAM02	Derrynane	Positive	Positive	Positive
VaCAM03	Dooaghtry	Positive	Positive	Positive
VaCAM04	Glencolmcille	Negative	Negative	Negative
VaCAM05	Kilshannig	Positive	Positive	Positive
VaCAM06	Kinlackagh Bay	Positive	Positive	Negative
VaCAM07	Maharees	Positive	Positive	Positive
VaCAM08	Dog's Bay	Positive	Positive	Positive
VaCAM10	Killanley Glebe	Positive	Positive	Negative
VaCAM11	Lahinch	Positive	Positive	Negative
VaCAM12	Malin Dunes	Positive	Positive	Positive
VaCAM13	Pollardstown Fen	Positive	Positive	Negative
VaCAM14	Streedagh Point Dunes	Positive	Positive	Positive
VaCAM15	Bartraw	Positive	Positive	Positive
VaCAM16	Inishmore Island	Positive	Positive	Negative
VaCAM17	Curragh Chase	Positive	Negative	Negative
VaCAM19	Louisa Bridge	Negative	Negative	Negative
VaCAM20	Ballysadare Bay	Positive	Positive	Positive
VaCAM21	Strandhill Airport	Positive	Positive	Positive
VaCAM22	Waterstown Lough	N/A	Positive	Negative

The number of positive sites has declined by six since the 2013-2018 monitoring survey and these include both coastal and inland sites.

All of the sites fall within SACs, with the exception of VaCAM11 Lahinch, which has only a very small overlap with an SAC, and VaCAM22 Waterstown Lough, which is entirely outside the SAC network.

3.2.2 Vertigo angustior population

While the results presented in Section 3.2.1 show a significant (35%) decline in the number of positive sites for *V. angustior* as compared to the 2013-2018 monitoring period, this does not fully describe the situation with regard to the *V. angustior* populations at the survey sites. Even at sites that were positive for the species, many of them have shown a decline in the number or percentage of positive samples as compared to previous monitoring periods. These declines are detailed in the individual site reports (Appendix II).

A broad comparison of the percentage of positive samples at the surveyed *V. angustior* sites across the three monitoring periods is presented in Table 5. This illustrates the general downward trajectory in the percentage of positive samples that has been occurring for *V. angustior* since 2013-18, with 14 sites showing a decrease in the percentage of positive samples, one site showing an increase, and five sites being stable/unchanged (though three of these stable sites had 0% positive samples in 2013-18).

Table 5 A comparison of the percentage (%) of positive samples locations at *V. angustior* sites surveyed across the 2007-12, 2013-18 and 2019-24 monitoring periods

Site ID	Site name	2007-12 (% positive)	2013-18 (% positive)	2019-24 (% positive)
VaCAM01	Beal Point	35	35	35
VaCAM02	Derrynane	46	36	18
VaCAM03	Dooaghtry	100	56	11
VaCAM04	Glencolmcille	0	0	0
VaCAM05	Kilshannig	63	21	7
VaCAM06	Kinlackagh Bay	77	44	0
VaCAM07	Maharees	15	17	6
VaCAM08	Dog's Bay	14	14	14
VaCAM10	Killanley Glebe	43	80	0
VaCAM11	Lahinch	61	7	0
VaCAM12	Malin Dunes	32	75	31
VaCAM13	Pollardstown Fen	67	13	0
VaCAM14	Streedagh Point Dunes	71	93	59
VaCAM15	Bartraw	76	82	92
VaCAM16	Inishmore Island	83	27	0
VaCAM17	Curragh Chase	56	0	0
VaCAM19	Louisa Bridge	0	0	0
VaCAM20	Ballysadare Bridge	100	92	50
VaCAM21	Strandhill Airport	60	21	7
VaCAM22	Waterstown Lough	NA	25	0

The Population status for each site was assessed based mainly on the criteria of Moorkens & Killeen (2011), with occasional additions or amendments by Long & Brophy (2019). Due to the nature of the assessment criteria (detailed in the individual site reports), in some cases the number or percentage of positive samples may remain unchanged, but a criterion may now fail due to the distribution of the positive samples within the site. The reason for any change in Population status at a site level is presented in Table 6.

Table 6 A comparison of the Population status at *V. angustior* sites surveyed across the 2013-18 and 2019-24 monitoring periods, including the reason for any change

Site ID	Site name	2013-18	2019-24	Reason for change
VaCAM01	Beal Point	Amber	Red	Drop in status due to the loss of two positive samples from transect
VaCAM02	Derrynane	Amber	Red	Drop in status due to a drop in number of positive samples across the site
VaCAM03	Dooaghtry	Green	Red	Drop in status due to a drop in number of positive samples along transect and across the site
VaCAM04	Glencolmcille	Red	Red	No change
VaCAM05	Kilshannig	Red	Red	No change
VaCAM06	Kinlackagh Bay	Amber	Red	Drop in status due to the number of positive samples across the site dropping to zero
VaCAM07	Maharees	Red	Red	No change
VaCAM08	Dog's Bay	Green	Red	Drop in status due to no positive samples within the grassy hollow with freshwater upwelling
VaCAM10	Killanley Glebe	Green	Red	Drop in status due to the number of positive samples across the site dropping to zero
VaCAM11	Lahinch	Red	Red	No change
VaCAM12	Malin Dunes	Green	Red	Drop in status due to a drop in number of positive samples along transect and across the site
VaCAM13	Pollardstown Fen	Red	Red	No change
VaCAM14	Streedagh Point Dunes	Green	Amber	Drop in status due to a drop in number of positive samples along transect
VaCAM15	Bartraw	Green	Green	No change
VaCAM16	Inishmore Island	Amber	Red	Drop in status due to the number of positive samples across the site dropping to zero
VaCAM17	Curragh Chase	Red	Red	No change
VaCAM19	Louisa Bridge	Red	Red	No change
VaCAM20	Ballysadare Bridge	Green	Red	Drop in status due to a drop in number of positive samples along transect and across the site
VaCAM21	Strandhill Airport	Red	Red	No change
VaCAM22	Waterstown Lough	Green	Red	Drop in status due to the number of positive samples across the site dropping to zero

3.2.3 *Vertigo angustior* habitat

A total of 992.08 ha of *V. angustior* habitat was included in the current survey of 20 sites, with 851.20 ha having some suitability for supporting the snail (Suboptimal-Unsuitable or better) and 140.89 ha considered Unsuitable (Table 7).

Table 7 A breakdown of *Vertigo angustior* habitat suitability class, in hectares (ha) and percent (%), surveyed during the 2019-2024 monitoring period

Habitat suitability class	Area (ha)	Area (%)
Optimal	78.10	7.9
Optimal-Suboptimal	181.99	18.3
Suboptimal	219.17	22.1
Suboptimal-Unsuitable	371.95	37.5
Unsuitable	140.89	14.2
TOTAL	992.08	

The total area surveyed dropped from 1045.66 ha in 2013-2018 to 992.08 ha in the current survey due to the removal of VaCAM09 Fanore from the survey schedule for the 2019-2024 monitoring period, dropping the total number of sites surveyed from 21 to 20.

The comparison of habitat suitability areas between the current and previous monitoring periods (2013-2018 and 2019-2024) is slightly complicated by the fact that the list of sites surveyed differs between monitoring periods. For this reason, the comparison is based on the figures relating to the surveyed sites that both monitoring periods have in common (Table 8).

Table 8 A comparison *Vertigo angustior* habitat suitability area in hectares (ha) between the 2013-2018 and 2019-2024 monitoring periods. Both ecological and interpreted changes are included. Excludes VaCAM09, which was not surveyed in 2019-2024

Habitat suitability class	2013-2018	2019-2024	Difference (ha)	Difference (%)
Optimal	69.22	78.10	+8.88	+12.8
Optimal-Suboptimal	149.17	181.99	32.82	+22.0
Suboptimal	278.44	219.17	-59.28	-21.3
Suboptimal-Unsuitable	347.40	371.95	+24.55	+7.1
Unsuitable	147.86	140.89	-6.97	-4.7
TOTAL	992.08	992.08		

The total area surveyed at the 20 sites visited during the two monitoring periods remains unchanged. There has been an increase in the area of Optimal (+12.8%), Optimal-Suboptimal (+22.0%) and Suboptimal-Unsuitable (+7.1%) habitat between the monitoring periods, while a decrease in the area of Suboptimal (-21.3%) and Unsuitable (-4.7%) habitat was recorded.

The Habitat status for each site was assessed based mainly on the criteria of Moorkens & Killeen (2011), with occasional additions or amendments by Long & Brophy (2019). Due to the nature of the assessment criteria (detailed in the individual site reports), in some cases the area of suitable habitat may change, but a criterion may still pass or fail as the change in the area of suitable habitat is not sufficient to change the result. The reason for any change in Habitat status at a site level is presented in Table 9.

Table 9 A comparison of the Habitat status at *Vertigo angustior* sites surveyed across the 2013-18 and 2019-24 monitoring periods, including the reason for any change

Site ID	Site name	2013-18	2019-24	Reason for change
VaCAM01	Beal Point	Amber	Amber	No change
VaCAM02	Derrynane	Amber	Red	Drop in status due to a drop in suitable habitat along transect and across the site
VaCAM03	Doogahtry	Green	Amber	Drop in status due to a drop in suitable wetness and thatch along transect
VaCAM04	Glencolmcille	Amber	Green	Improvement in status to an increase in the suitable habitat along the transect
VaCAM05	Kilshannig	Red	Red	No change
VaCAM06	Kinlackagh Bay	Red	Red	No change
VaCAM07	Maharees	Red	Red	No change
VaCAM08	Dog's Bay	Red	Red	No change
VaCAM10	Killenley Glebe	Green	Green	No change
VaCAM11	Lahinch	Green	Amber	Drop in status due to a drop in the suitable habitat along the transect
VaCAM12	Malin Dunes	Red	Red	No change
VaCAM13	Pollardstown Fen	Red	Red	No change
VaCAM14	Streedagh Point Dunes	Amber	Amber	No change
VaCAM15	Bartraw	Green	Green	No change
VaCAM16	Inishmore Island	Amber	Red	Drop in status due to a drop in the suitable habitat and wetness along the transect
VaCAM17	Curragh Chase	Red	Red	No change
VaCAM19	Louisa Bridge	Red	Red	No change
VaCAM20	Ballysadare Bridge	Green	Red	Drop in status due to a drop in the suitable habitat and wetness along the transect
VaCAM21	Strandhill Airport	Red	Red	No change
VaCAM22	Waterstown Lough	Green	Red	Drop in status due to a drop in the suitable habitat across the site

The reasons for the changes to the habitat suitability class are divided into those that are ecological in nature (*e.g.* drying out, grazing level altering the vegetation structure) and interpretation (*e.g.* view that previous assessment was inaccurate, but no actual ecological change is thought to have occurred). The positive and negative changes that have affected the area covered by the five habitat suitability classes are set out in Table 10 and Table 11, respectively.

Table 10 A breakdown of the positive *Vertigo angustior* habitat suitability changes recorded in 2019-2024 with reason for change. *O = Optimal, O-SO = Optimal-Suboptimal, SO = Suboptimal, SO-U = Suboptimal-Unsuitable, U = Unsuitable. **Eco = Ecological, Int = Interpreted

Site ID	Site name	2013-2018*	2019-2024*	Area (ha)	Change**
VaCAM04	Glencolmcille	U	SO-U	8.43	Eco - Habitat is slight more suitable, particularly in the northwest
VaCAM06	Kinlackagh Bay	S-US	SO	0.83	Eco - Enough suitable habitat present to justify increase
VaCAM06	Kinlackagh Bay	S-US	SO	16.62	Eco - Low level of grazing has allowed more suitable habitat to develop
VaCAM07	Maharees	SO	O-SO	31.39	Eco - Reduction in grazing pressure
VaCAM14	Streedagh Point Dunes	SO	O-SO	9.37	Eco - Sward more open, with less dense, sodden thatch
VaCAM15	Bartraw	O-SO	O	3.68	Int - More suitable habitat present than previously considered

Table 11 A breakdown of the negative *Vertigo angustior* habitat suitability changes recorded in 2019-2024 with reason for change. *O = Optimal, O-SO = Optimal-Suboptimal, SO = Suboptimal, SO-U = Suboptimal-Unsuitable, U = Unsuitable. **Eco = Ecological, Int = Interpreted

Site ID	Site name	2013-2018*	2019-2024*	Area (ha)	Change
VaCAM01	Beal Point	SO	SO-U	6.36	Eco - Heavy overgrazing has resulted in no *Festuca rubra* thatch, with forbs dominating
VaCAM02	Derrynane	SO	SO-U	7.68	Eco - Overgrazed by rabbits and disturbed by burrows
VaCAM16	Inishmore Island	SO	SO-U	16.51	Eco - Sward grazed short and very dry
VaCAM16	Inishmore Island	SO	SO-U	1.3	Eco - Bryophyte layer is replacing *F. rubra* thatch
VaCAM16	Inishmore Island	SO-U	U	1.46	Int - Disturbance from historical sand quarrying and habitat too dry
VaCAM17	Curragh Chase	SO	SO-U	3.19	Eco - Most of the fen is too wet for snail, with rank grasses and rushes causing loss of bryophyte layer
VaCAM22	Waterstown Lough	O-SO	SO	2.64	Eco - Limited bryophyte layer and lack of light *F. rubra* litter, likely due to grazing

Whorl Snail Monitoring 2/2

3.2.4 *Vertigo angustior* pressures and threats

Pressures are considered to be factors which have acted within a reporting period, while threats are factors expected to be acting in the future. It is possible for the same impact to be both a pressure and a threat if it is having an impact now and this impact is likely to continue. The pressures and threats relevant to the *V. angustior* population at the survey sites were recorded following the pressures list 2019-2024 reporting period for Articles 12 and 17. A total of 17 pressures or threats were recorded across the 20 *V. angustior* sites (Table 12) and all sites had at least one negative pressure recorded.

The most frequently recorded pressure was PM07 *Natural processes without direct or indirect influence from human activities or climate change*. This is a broad category that was recorded from 70% of surveyed sites, with this negative pressure generally referring to marine erosion along the seaward edge of sand dune systems, and occasionally scrub encroachment.

PA07 *Intensive grazing or overgrazing by livestock* was recorded at 65% of the surveyed sites, and related to cattle, sheep and, occasionally, horses. The negative effect of grazing included the removal of a well-developed *Festuca rubra* thatch, and a reduction in the formation of *Ammophila arenaria* tussocks. On two occasions, this pressure was considered to be having a positive effect and one occasion a neutral effect.

PF05 *Sports, tourism and leisure activities* was recorded from 45% of the surveyed sites, with this negative pressure most commonly relating to trampling caused by walkers, but also golf courses and caravan parks.

PI02 Other invasive alien species (other than species of Union concern) was recorded from 40% of sites and related to a range of invasive alien species, the most significant of which was *Hippophae rhamnoides*. Less important examples included *Polygonum wallichii*, *Acer pseudoplatanus*, *Phormium tenax*, *Pinus contorta*, *Petasites pyrenaicus*, and *Montbretia*.

PI03 *Problematic native species* was recorded from 35% of the sites and included rabbits (*Oryctolagus cuniculus*) through burrowing and tight grazing of the sward, reducing or removing the *Festuca rubra* thatch, and sometimes the *Ammophila arenaria* from places.

PJ03 *Changes in precipitation regimes due to climate change* was noted for 30% of sites in the form of drying out of *Festuca rubra* thatch.

The broad category PA25 *Agriculture activities not referred to above* was recorded from 25% of sites and refers to tractor or other vehicle tracks.

PA05 Abandonment of management/use of grasslands and other agricultural and agroforestry systems (*e.g.* cessation of grazing, mowing or traditional farming) was record for 10% of sites and was due to vegetation becoming rank and more unsuitable for supporting the snail.

Killaspugbrone Looped Trail

Table 12 List of the pressures and threats recorded at the *Vertigo angustior* sites surveyed during the 2019-2024 monitoring period in decreasing order of frequency of occurrence

Pressure/ threat code	Pressure/threat name	Positive	Negative	Neutral	Total
PM07	Natural processes without direct or indirect influence from human activities or climate change	-	14	-	14
PA07	Intensive grazing or overgrazing by livestock	2	10	1	13
PF05	Sports, tourism and leisure activities	-	9	-	9
PI02	Other invasive alien species (other than species of Union concern)	-	8	-	8
PI03	Problematic native species	1	5	1	7
PJ03	Changes in precipitation regimes due to climate change	-	6	-	6
PA25	Agriculture activities not referred to above	-	5	-	5
PA05	Abandonment of management/use of grasslands and other agricultural and agroforestry systems (e.g. cessation of grazing, mowing or traditional farming)	-	2	-	2
PA01	Conversion into agricultural land (excluding drainage and burning)	-	1	-	1
PA08	Extensive grazing or undergrazing by livestock	-	1	-	1
PA13	Application of natural or synthetic fertilisers on agricultural land	-	1	-	1
PB01	Conversion to forest from other land uses, or afforestation (excluding drainage)	-	1	-	1
PF01	Conversion from other land uses to built-up areas	-	0	1	1
PF03	Creation or development of sports, tourism and leisure infrastructure	-	0	1	1
PF06	Deposition and treatment of waste/rubbish from built-up areas	-	1	-	1
PH08	Other human intrusions and disturbance not mentioned above	-	1	-	1
PJ07	Cyclones, storms, or tornados due to climate change	-	1	-	1

The remaining nine pressures and threats recorded were only noted for one site (5% of the sites surveyed). Of the agricultural pressures, PA01 *Conversion into agricultural land (excluding drainage and burning)* related to potato cultivation on fixed dunes, PA08 *Extensive grazing or undergrazing by livestock* was noted where rank agricultural grasses had been allowed to develop on fixed dune habitat, and PA13 *Application of natural or synthetic fertilisers on agricultural land* occurred on improved grassland above the *V. angustior* site. PB01 *Conversion to forest from other land uses, or afforestation (excluding drainage)* occurred where *Salix* spp. and *Alnus glutinosa* was planted and continues to grow. PF01 *Conversion from other land uses to built-up areas* refers to one-off housing built above the site, PF03 *Creation or development of sports, tourism and leisure infrastructure* related to a golf course, while PF06 *Deposition and treatment of waste/rubbish from built-up areas* was for the dumping of artificial grass and grass cuttings on a golf course. The pressure PH08 *Other human intrusions and disturbance not mentioned above* was for the dumping of round hay bales on

dunes, while PJ07 *Cyclones, storms, or tornados due to climate change* rel to the greatly increased erosion of the front the dune system.

3.2.4.1 Negative pressures/threats

In terms of the intensity of the negative effect of the recorded pressures and threats, and the area affected, PJ03 *Changes in precipitation regimes due to climate change* was considered to be having the most widespread effect, with a High intensity recorded over 482.30 ha across five sites (Table 13). This was followed by PA07 *Intensive grazing or overgrazing by livestock* (22.68 ha) and PM07 *Natural processes without direct or indirect influence from human activities or climate change* (19.50 ha). The remaining High intensity negative effects were PI02 *Other invasive alien species (other than species of Union concern)* (13.51 ha), PI03 *Problematic native species* (9.9 ha), PJ07 *Cyclones, storms, or tornados due to climate change* (3.97 ha), PA13 *Application of natural or synthetic fertilisers on agricultural land* (3.19 ha), PA05 *Abandonment of management/use of grasslands and other agricultural and agroforestry systems (e.g. cessation of grazing, mowing or traditional farming)* (1.40 ha), PB01 *Conversion to forest from other land uses, or afforestation (excluding drainage)* (0.20 ha), PH08 *Other human intrusions and disturbance not mentioned above* (0.13 ha), PF06 *Deposition and treatment of waste/rubbish from built-up areas* (0.11 ha) and PA01 *Conversion into agricultural land (excluding drainage and burning)* (0.08 ha).

Of the Medium intensity negative pressures, PA07 *Intensive grazing or overgrazing by livestock* was the most extensive at 409.22 ha across four sites. This was followed by PF05 *Sports, tourism and leisure activities* (150.24 ha), PJ03 *Changes in precipitation regimes due to climate change* (129.45 ha) and PA05 *Abandonment of management/use of grasslands and other agricultural and agroforestry systems (e.g. cessation of grazing, mowing or traditional farming)* (52.92 ha) and PM07 *Natural processes without direct or indirect influence from human activities or climate change* (28.95 ha). The remaining Medium intensity negative effects were PA08 *Extensive grazing or undergrazing by livestock* (18.17 ha), PI03 *Problematic native species* (12.28 ha), PA25 *Agriculture activities not referred to above* (1.42 ha) and PI02 *Other invasive alien species (other than species of Union concern)* (0.11 ha).

The remaining negative pressures were of Low intensity, with the most extensive being PI03 *Problematic native species* (79.69 ha), followed by PA07 *Intensive grazing or overgrazing by livestock* (41.91 ha) and PF05 *Sports, tourism and leisure activities* (21.51 ha). The remaining Low intensity negative effects were PM07 *Natural processes without direct or indirect influence from human activities or climate change* (2.34 ha), PI02 *Other invasive alien species (other than species of Union concern)* (0.10 ha) and PA25 *Agriculture activities not referred to above* (0.04 ha).

Table 13 Pressures and threats recorded as having a negative influence at *Vertigo angustior* sites during the 2019-2024 monitoring survey, ranked in order of Intensity (High to Low) and Area affected (High to Low)

Pressure/ threat code	Pressure/threat name	Intensity	Area affected (ha)	No. of sites
PJ03	Changes in precipitation regimes due to climate change	High	482.30	5
PA07	Intensive grazing or overgrazing by livestock	High	22.68	4
PM07	Natural processes without direct or indirect influence from human activities or climate change	High	19.50	8
PI02	Other invasive alien species (other than species of Union concern)	High	13.51	5
PI03	Problematic native species	High	9.90	2
PJ07	Cyclones, storms, or tornados due to climate change	High	3.97	1
PA13	Application of natural or synthetic fertilisers on agricultural land	High	3.19	1
PA05	Abandonment of management/use of grasslands and other agricultural and agroforestry systems (*e.g.* cessation of grazing, mowing or traditional farming)	High	1.40	1
PB01	Conversion to forest from other land uses, or afforestation (excluding drainage)	High	0.20	1
PH08	Other human intrusions and disturbance not mentioned above	High	0.13	1
PF06	Deposition and treatment of waste/rubbish from built-up areas	High	0.11	1
PA01	Conversion into agricultural land (excluding drainage and burning)	High	0.08	1
PA07	Intensive grazing or overgrazing by livestock	Medium	409.22	4
PF05	Sports, tourism and leisure activities	Medium	150.24	6
PJ03	Changes in precipitation regimes due to climate change	Medium	129.45	1
PA05	Abandonment of management/use of grasslands and other agricultural and agroforestry systems (*e.g.* cessation of grazing, mowing or traditional farming)	Medium	52.92	1
PM07	Natural processes without direct or indirect influence from human activities or climate change	Medium	28.95	3
PA08	Extensive grazing or undergrazing by livestock	Medium	18.17	1
PI03	Problematic native species	Medium	12.28	1
PA25	Agriculture activities not referred to above	Medium	1.42	3
PI02	Other invasive alien species (other than species of Union concern)	Medium	0.11	1
PI03	Problematic native species	Low	79.69	2
PA07	Intensive grazing or overgrazing by livestock	Low	41.91	2
PF05	Sports, tourism and leisure activities	Low	21.51	3
PM07	Natural processes without direct or indirect influence from human activities or climate change	Low	2.34	3
PI02	Other invasive alien species (other than species of Union concern)	Low	0.10	2
PA25	Agriculture activities not referred to above	Low	0.04	2

3.2.4.2 Positive pressures/threats

Two positive pressures were identified during the current survey (Table 14). Neither was identified as a conservation measure, but rather as a pressure that was operating at a level that was having an overall positive effect. PA07 *Intensive grazing or overgrazing by livestock* affected 132.64 ha of *V. angustior* habitat at one site and related to cattle grazing at a level that was maintaining an open *Ammophila arenaria* and *Festuca rubra* dominated sward. PI03 *Problematic native species* refers to a low level of grazing by rabbits, where it helps keep the fixed dune sward open, but has not reached a level that negatively impacts on the *F. rubra* thatch.

Table 14 Pressures and threats recorded as having a positive influence at *Vertigo angustior* sites during the 2019-2024 monitoring survey, ranked in order of Intensity (High to Low) and Area affected (High to Low)

Pressure/ threat code	Pressure/threat name	Intensity	Area affected (ha)	No. of sites
PA07	Intensive grazing or overgrazing by livestock	Low	132.64	2
PI03	Problematic native species	Low	23.72	1

3.2.4.3 Neutral pressures/threats

Four neutral pressures and threats were identified during the current survey (Table 15). The most extensive pressure was PF03 *Creation or development of sports, tourism and leisure infrastructure* (22.17 ha), which referred to a long-established golf course with suitable habitat in the rough. PI03 *Problematic native species* affected 8.9 ha of the *V. angustior* habitat, while PF01 *Conversion from other land uses to built-up areas* (0.79 ha) and PA07 *Intensive grazing or overgrazing by livestock* (0.78 ha).

Table 15 Pressures and threats recorded as having a neutral influence at *Vertigo angustior* sites during the 2019-2024 monitoring survey, ranked in order of Intensity (High to Low) and Area affected (High to Low)

Pressure/ threat code	Pressure/threat name	Intensity	Area affected (ha)	No. of sites
PF03	Creation or development of sports, tourism and leisure infrastructure	Low	22.17	1
PI03	Problematic native species	Low	8.90	1
PF01	Conversion from other land uses to built-up areas	Low	0.79	1
PA07	Intensive grazing or overgrazing by livestock	Low	0.78	1

3.2.5 *Vertigo angustior* site conservation assessments

Individual site conservation assessments were carried out for *Vertigo angustior* sites surveyed during the current monitoring project. The assessment of Population and Habitat for each site was based on criteria set by Moorkens & Killeen (2011) and Long & Brophy (2019), with Future Prospects based on the future trends of Population and Habitat considering the pressures and threats relevant to the site and the effect of any conservation measures that have been implement or will be implemented in the future (DG Environment, 2023). The Overall Conservation Assessment is based on the lowest score achieved across the three elements. Table 16 presents the site conservation assessments for the 20 *V. angustior* sites assessed

during the current monitoring period, with the 2007-2012 and 2013-2018 results included for comparison.

There has been a clear decline in the conservation status of the *V. angustior* sites across the three monitoring periods. In 2007-2012, there were 11 Green sites, four Amber and four Red, which dropped to four Green sites (including VaCAM22 Waterstown Lough, which was assessed for the first time), five Amber sites and 11 Red sites in 2013-2018. In the current round of monitoring, there was one Green site, one Amber site and 18 Red sites. Only one site, VaCAM15 Bartraw, has remained consistently Green across the three monitoring periods.

Full details of the criteria used in carrying out the Population and Habitat assessments are presented in the *V. angustior* site reports in Appendix II.

Table 16 Site conservation assessments for *Vertigo angustior* across the last three monitoring periods for the sites surveyed during the current monitoring period. Pop = Population, Hab = Habitat, FP = Future Prospects

Site ID	Site name	2007-2012				2013-2018				2019-2024			
		Pop	Hab	FP	Overall	Pop	Hab	FP	Overall	Pop	Hab	FP	Overall
VaCAM01	Beal Point	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Red	Amber	Red	Red
VaCAM02	Derrynane	Green	Green	Green	Green	Amber	Amber	Amber	Amber	Red	Red	Amber	Red
VaCAM03	Doogahtry	Green	Green	Green	Green	Green	Green	Amber	Amber	Red	Amber	Red	Red
VaCAM04	Glencolmcille	Red	Amber	Amber	Red	Red	Amber	Red	Red	Red	Green	Red	Red
VaCAM05	Kilshannig	Green	Green	Green	Green	Red	Red	Amber	Red	Red	Red	Red	Red
VaCAM06	Kinlackagh Bay	Amber	Red	Amber	Red	Amber	Red	Amber	Red	Red	Red	Red	Red
VaCAM07	Maharees	Red	Red	Amber	Red	Red	Red	Amber	Red	Red	Red	Red	Red
VaCAM08	Dog's Bay	Green	Green	Green	Green	Green	Red	Amber	Red	Red	Red	Amber	Red
VaCAM10	Kilfenley Glebe	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Amber	Red
VaCAM11	Lahinch	Green	Green	Green	Green	Red	Green	Amber	Red	Red	Amber	Red	Red
VaCAM12	Malin Dunes	Green	Green	Green	Green	Green	Red	Green	Red	Red	Red	Red	Red
VaCAM13	Pollardstown Fen	Green	Green	Amber	Amber	Red	Red	Red	Red	Red	Red	Red	Red
VaCAM14	Streedagh Point Dunes	Green	Green	Green	Green	Green	Amber	Green	Amber	Amber	Amber	Amber	Amber
VaCAM15	Bartraw	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
VaCAM16	Inishmore Island	Green	Green	Green	Green	Amber	Amber	Amber	Amber	Red	Red	Red	Red
VaCAM17	Curragh Chase	Green	Amber	Amber	Amber	Red	Red	Red	Red	Red	Red	Red	Red
VaCAM19	Louisa Bridge	Red	Amber	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red
VaCAM20	Ballysadare Bay	Green	Green	Green	Green	Green	Green	Green	Green	Red	Red	Red	Red
VaCAM21	Strandhill Airport	Green	Amber	Amber	Amber	Red	Red	Amber	Red	Red	Red	Red	Red
VaCAM22	Waterstown Lough	NA	NA	NA	NA	Green	Green	Green	Green	Red	Red	Red	Red

3.3 *Vertigo geyeri* results

3.3.1 *Vertigo geyeri* overview

Nineteen sites were surveyed for *Vertigo geyeri* across the field seasons 2022-2024. All 19 sites were previously surveyed by Long & Brophy (2019), with VgCAM23 Waterstown Lough added since Moorkens & Killeen (2011) discovered the species along with *V. angustior* during 2007-2012 monitoring of *V. moulinsiana* at the site, and VgCAM24 Duleek Commons also added since 2007-2012. *Vertigo geyeri* was recorded at nine of the 19 sites surveyed (Table 17).

Table 17 List of *Vertigo geyeri* sites surveyed during the 2019-2024 monitoring period, and whether the site was positive or negative for the species in this round of monitoring and the previous two rounds

Site code	Site name	2007-12	2013-18	2019-24
VgCAM01	Meenaphuil	Positive	Positive	Positive
VgCAM02	Tievebaun	Positive	Positive	Positive
VgCAM03	Brackloon	Positive	Positive	Negative
VgCAM04	Clonaslee Eskers	Negative	Negative	Negative
VgCAM05	Dooaghtry	Positive	Positive	Positive
VgCAM06	Drimmon Lough	Positive	Positive	Negative
VgCAM08	Sheskinmore Lough	Positive	Positive	Positive
VgCAM09	Annaghmore Lough	Positive	Negative	Negative
VgCAM10	Ballyness Bay	Positive	Positive	Negative
VgCAM13	Easkey Valley	Positive	Positive	Negative
VgCAM14	Polagull Bay	Positive	Positive	Positive
VgCAM15	Silver River	Positive	Positive	Negative
VgCAM16	Fermoyle	Positive	Positive	Positive
VgCAM18	Fin Lough (Offaly)	Positive	Positive	Positive
VgCAM20	Lisduff Fen	Positive	Negative	Negative
VgCAM21	Ox Mountains	Positive	Positive	Positive
VgCAM22	Pollardstown Fen	Positive	Positive	Negative
VgCAM23	Waterstown Lough	N/A	Positive	Positive
VgCAM24	Duleek Commons	N/A	Positive	Negative

3.3.2 *Vertigo geyeri* population

While the results presented in Section 3.3.1 show a significant (44%) decline in the number of positive sites for *V. geyeri* as compared to the 2013-2018 monitoring period, this does not fully describe the situation with regard to the *V. geyeri* populations at the survey sites. Even at sites that were positive for the species, many of them have shown a decline in the number or percentage of positive samples as compared to previous monitoring periods. These declines are detailed in the individual site reports (Appendix III).

A broad comparison of the percentage of positive samples at the surveyed *V. geyeri* sites across the three monitoring periods is presented in Table 18. This illustrates the general downward trajectory in the percentage of positive samples that has been occurring for *V. geyeri* since 2013-18, with 13 sites showing a decrease in the percentage of positive samples, six

sites remain stable/unchanged (though three of these stable sites had 0% positive samples in 2013-18) and none of the sites are increasing.

Table 18 A comparison of the percentage (%) of positive samples locations at *V. geyeri* sites surveyed across the 2007-12, 2013-18 and 2019-24 monitoring periods

Site ID	Site name	2007-12 (% positive)	2013-18 (% positive)	2019-24 (% positive)
VgCAM01	Meenaphuil	100	100	100
VgCAM02	Tievebaun	91	100	100
VgCAM03	Brackloon	50	50	0
VgCAM04	Clonaslee Eskers	0	0	0
VgCAM05	Dooaghtry	46	57	29
VgCAM06	Drimmon Lough	83	40	0
VgCAM08	Sheskinmore	100	88	75
VgCAM09	Annaghmore Lough	44	0	0
VgCAM10	Ballyness Bay	50	25	0
VgCAM13	Easkey Valley	50	20	0
VgCAM14	Polagull Bay	64	50	50
VgCAM15	Silver River	75	50	0
VgCAM16	Fermoyle	44	50	33
VgCAM18	Fin Lough (Offaly)	100	50	14
VgCAM20	Lisduff Fen	63	0	0
VgCAM21	Ox Mountains	6	5	3
VgCAM22	Pollardstown Fen	70	10	0
VgCAM23	Waterstown Lough	NA	43	14
VgCAM24	Duleek Commons	NA	25	0

The Population status for each site was assessed based mainly on the criteria of Moorkens & Killeen (2011), with occasional additions or amendments by Long & Brophy (2019). Due to the nature of the assessment criteria (detailed in the individual site reports), in some cases the number or percentage of positive samples may remain unchanged, but a criterion may now fail due to the distribution of the positive samples within the site. The reason for any change in Population status at a site level is presented in Table 19.

Table 19 A comparison of the Population status at *V. geyeri* sites surveyed across the 2013-18 and 2019-24 monitoring periods, including the reason for any change

Site ID	Site name	2013-18	2019-24	Reason for change
VgCAM01	Meenaphull	Green	Green	No change
VgCAM02	Tlevebaun	Green	Green	No change
VgCAM03	Brackloon	Red	Red	No change
VgCAM04	Clonaslee Eskers	Red	Red	No change
VgCAM05	Dooaghtry	Amber	Amber	No change
VgCAM06	Drimmon Lough	Red	Red	No change
VgCAM08	Sheskinmore	Green	Green	No change
VgCAM09	Annaghmore Lough	Red	Red	No change
VgCAM10	Ballyness Bay	Red	Red	No change
VgCAM13	Easkey Valley	Red	Red	No change
VgCAM14	Polagull Bay	Amber	Amber	No change
VgCAM15	Silver River	Green	Red	Drop in status due to the number of positive samples across the site dropping to zero
VgCAM16	Fermoyle	Green	Amber	Drop in status due to the number of positive samples within Polygon B dropping to zero
VgCAM18	Fin Lough (Offaly)	Green	Red	Drop in status due to a drop in the number of positive samples on transect and across the site
VgCAM20	Lisduff Fen	Red	Red	No change
VgCAM21	Ox Mountains	Amber	Amber	No change
VgCAM22	Pollardstown Fen	Red	Red	No change
VgCAM23	Waterstown Lough	Green	Amber	Drop in status due to a drop in the number of positive samples across the site, away from the transect, to zero
VgCAM24	Duleek Commons	Green	Red	Drop in status due to the number of positive samples across the site dropping to zero

3.3.3 *Vertigo geyeri* habitat

A total of 204.85 ha of *V. geyeri* habitat was included in the current survey of 19 sites, with 168.34 ha having some suitability for supporting the snail (Suboptimal-Unsuitable or better) and 36.51 ha considered Unsuitable (Table 20).

Table 20 A breakdown of *Vertigo geyeri* habitat suitability class, in hectares (ha) and percent (%), surveyed during the 2019-2024 monitoring period.

Habitat suitability class	Area (ha)	Area (%)
Optimal	5.18	2.5
Optimal-Suboptimal	74.33	36.3
Suboptimal	33.26	16.2
Suboptimal-Unsuitable	55.57	27.1
Unsuitable	36.51	17.8
TOTAL	204.85	

The total area surveyed has dropped from 206.63 ha in 2013-2018 to 204.85 ha in the current survey, because Polygon C of VgCAM22 Pollardstown Fen was not accessed during the current survey.

The comparison of habitat suitability areas between the current and previous monitoring periods (2013-2018 and 2019-2024) is slightly complicated by the fact that one polygon at VgCAM22 Pollardstown Fen was surveyed in 2019-2024, but not 2013-2018. For this reason, the comparison is based on the figures relating to the surveyed sites and polygons that both monitoring periods have in common (Table 21).

Table 21 A comparison *Vertigo geyeri* habitat suitability area in hectares (ha) between the 2013-2018 and 2019-2024 monitoring periods. Both ecological and interpreted changes are included.

Habitat suitability class	2013-2018	2019-2024	Difference (ha)	Difference (%)
Optimal	9.24	5.18	-4.06	-43.9
Optimal-Suboptimal	62.68	74.33	+11.65	+18.6
Suboptimal	48.15	33.26	-14.89	-30.9
Suboptimal-Unsuitable	38.02	55.09	+17.07	+44.9
Unsuitable	46.28	36.51	-9.77	-21.1
TOTAL	204.37	204.37		

The total area surveyed at the sites during the two monitoring periods remains unchanged, with the exception of one 0.48 ha polygon at VgCAM22 Pollardstown Fen that was surveyed in 2019-2024, but not accessed in 2013-2018. There has been an increase in the area of Optimal-Suboptimal (+18.6%) and Suboptimal-Unsuitable (+44.9%) habitat between the monitoring periods, while a decrease was recorded in the area of Optimal (-43.9%), Suboptimal (-30.9%) and Unsuitable (-21.1%) habitat.

The Habitat status for each site was assessed based mainly on the criteria of Moorkens & Killeen (2011), with occasional additions or amendments by Long & Brophy (2019). Due to the nature of the assessment criteria (detailed in the individual site reports), in some cases the area of suitable habitat may change, but a criterion may still pass or fail as the change in the area of suitable habitat is not sufficient to change the result. The reason for any change in Habitat status at a site level is presented in Table 22.

Monitoring and Condition Assessment of Populations of Vertigo geyeri, Vertigo angustior and Ve rtigo moulinsiana in Ireland

Moorkens, E.A. & Killeen, I.J. Citation: Moorkens, E.A. & Killeen, I.J. (2011)

Monitoring and Condition Assessment of Populations of Vertigo geyeri, Vertigo angustior and Ve rtigo moulinsiana in Ireland.

Irish Wildlife Manuals, No. 55.

National Parks and Wildlife Service, Department of Arts, Heritage and Gaeltacht, Dublin, Ireland

I want to highlight is according to the *'Monitoring and Condition Assessment of Populations of Vertigo Geyeri, Vertigo angustior and Vertigo Moulinsiana in Ireland' Irish Wildlife Manual No 55 - Dept of Arts Heritage and the Gaeltacht.*

Strandhill Airport is where the WWTP is located.

Table 21: Recommended survey schedule 2011-2013 - pg 76
2011 2012 2013
Ballysadare VaCAM20
Strandhill Airport VaCAM21

pg 21 - Survey Methodology

Time of Survey

Survey should take place between **April and October** inclusive in conditions that are not excessively wet, in order to minimise habitat disturbance through trampling. During this period snails are active and some breeding should have occured.

- This means that the Sligo Co. Co.'s AA Screening for the Vertigo Angustior cannot be accepted as it can't be assessed before this time frame - the 'Walk Over' that was done in the Screening is insufficient to screen for Whorl Snail.
-
- This also means that Sligo Co. Co. has intentionally broken their obligation to screen for Whorl Snails having not done a screening for the Looped Trails.
-

- Also, a dense recorded habitat around the perimeter of the Waste Water Treatment Plant - which means that the WWTP did not do the EIA which - means that the legal permission for this build has not been established and cannot be approved retrospectively



Dr Don Cotton

Distinguished Recorder 2012

Dr Don Cotton - National Biodiversity Data Centre (accessed 15/03/2026)

Having spent several years working and studying in the UK Don came to Ireland in 1976 to work as a post-doc in UCD in the field of soil invertebrate ecology. Declan Doogue was a great inspiration and contact around this time and through him Don became involved in the Irish Biogeographical Society and the Dublin Naturalists Field Club. His involvement with the Irish Biogeographical Society was seminal in focussing naturalists like Don to record flora and fauna.

Don's recording career began with woodlice, earthworms and other invertebrates such as Odonata and Orthoptera. He carried out a methodical study of the Odonata of Dublin and Wicklow (1978-1980) and reviewed all Irish Orthoptera records. Records during this period were written on "Cope-Chat punched cards" and in field note books.

In early 1977 Don was acquainted with John Lovatt and became involved in Irish Wildbird Conservancy and in wetland bird counts for Lough Derravaragh, Co Westmeath. He founded a young ornithologists movement and was invited on to the Council of IWC 1979-1981.

In 1981 he moved to Sligo to lecture in Ecology and Geology at the Regional Technical College and played a key role in developing an Hons Degree Course in Environmental Science & Technology. At this point his recording focus changed to specialising in all aspects of the natural history of Sligo and Leitrim. During his first 5 years in Sligo he was involved in special surveys of Odonata, Lepidoptera, Orthoptera and Ornithology and established an IWC Sligo Branch doing wetland bird surveys and flora and invertebrate studies. Some of the main recording initiatives he was involved in over the next number of years were:

Winter Atlas of birds for Sligo and Leitrim 1981-1984; Winter Wetlands Survey 1984-1987 for Sligo and Leitrim; Chough Survey; Whooper swan survey and Barnacle goose survey. From 1990 to1992 he carried out a special survey of Harvestmen with Martin Cawley

In 1995 Don established a computer database for his species records which was one of the first PC based amateur databases to be established in Ireland. He extended the computerisation of his records in 2000 with a references and habitats database for Sligo and Leitrim.

Don was founder member of the Irish Whale & Dolphin Group and its first Chairman in 1990. He was the Botanical Society of British Isles (BSBI) County Recorder for Leitrim (1997-2012) and

nominally for Sligo (1997-2001) during the years of the 'New Atlas of the British and Irish Flora'. He is the current BSBI County Recorder for Sligo.

)n served on the Board and the Editorial Committee of the Irish Naturalists' Journal and also served 3 years as Chairman of INJ. He currently serves on the following committees: Praeger Committee (RIA); Sligo Heritage Forum (Sligo Co.Co.); Wildlife Committee (Heritage Council).

Sligo Champion/ Irish Independent

Don to receive national honour for wildlife work

Tue 20 Nov 2012 at 10:25

FOR 30 years he has documented Sligo's wildlife habitats.

Former Environmental Science lecturer at IT Sligo, Don Cotton, is now to be honoured for his work.

Don, pictured, will receive the National ' Distinguished Recorder' award at the Royal Irish Academy on Thursday.

He is being presented with the award for a total of 35 years biological recording, 30 of which were in Sligo and Leitrim.

Don said: "Sometimes the people living in Sligo take their environment for granted because they see it every day. However, tourists appreciate the landscapes and many visitors recognise the flowers and wild animals and wonder why we aren't doing more to protect what we have.

"We are in danger of losing this biological diversity through lack of knowledge and understanding and that is why I have spent over 30 years of my life scientifically recording the habitats and living creatures around us in the hope that special places for wildlife can be conserved for future generations."

Narrow-mouthed intruder could bring sports facilities to a crawl

MICHAEL MORAN

Sligo Champion, Irish Independent, Wed 15 Jul 2009 at 16:17

Vertigo Angustior is holding up plans for the development of sport and recreational facilities at Strandhill. However, it's not a case of a conscientious objector â?" rather a protected species of snail!

The narrow-mouthed whorl snail-included in an EC Habitats Directive-has been discovered on part of lands zoned for recreational development as part of the Strandhill Local Area Plan.

Officials of Sligo County Council are negotiating the redesign of this part of the project in a bid to move it forward.

Director of Services Rita McNulty told Councillors that while a site had initially been identified and plans drawn up for a playing pitch, community building and a playground, surveys conducted by the National Parks and Wildlife service on behalf of the Council had found that it went through the path of the protected species of snail.

She later informed councillors that the council had met with the relevant department and were attempting to redesign the scheme so that there would be no problems from an environmental point of view. These discussions were ongoing with no outcome as of yet, Ms. McNulty added.

In proposing a three year extension to the Strandhill Plan, as recommended in a report from County Manager, Mr. Hubert Kearns, Councillor Jim McGarry referred to the rare snail.

"One concern I have is that the current plan has not achieved its potential in terms of community facilities.

"A major stumbling block in the development of these sporting amenities was the discovery of the protected species, Vertigo Angustior, or narrow mouthed whorl snail, on the lands the County Council had zoned for recreational development," he said.

He added that Ms. McNulty, was doing great work to pinpoint what parts of this land was actually available for development.

"If it turns out that there is not enough land available to us for development of recreational and sporting facilities, then I would be urging us as a council to look at different sites for development," Clr. McGarry maintained.

Environment

A decade after a tiny snail halted work on a Co Sligo water treatment plant, Uisce Éireann to bring it back

Whorl snail population will be revived in its original home near Lake Talt



Uisce Éireann (formerly Irish Water) has become the Vertigo Geyeri snail unlikely saviour

Mark Hilliard

Mon Aug 21 2023 - 06:00•4 MIN READ

Almost a decade after a tiny, unseen snail halted urgent public health works on a water treatment plant in the west of Ireland, Uisce Éireann is about to bring it back.

It could be described as snail's pace conservation but Vertigo geyeri, more commonly the whorl snail, is likely to return to its natural habitat near Lough Talt in Co Sligo, two decades after it was last spotted.

Uisce Éireann (formerly Irish Water) has become its unlikely saviour. The state-owned company struck an unprecedented planning arrangement allowing its treatment plant to be upgraded in exchange for safeguarding the habitat and slowly reintroducing the species.

All going well, the whorl snail should be back in its natural habitat by early 2028 – 21 years after it was last sighted and 13 years after an initial planning application to upgrade the Lough Talt treatment plant was first rejected.

In 2015, the Environmental Protection Agency placed the Lough Talt plant on its remedial action list because it was not sufficiently protecting against cryptosporidium or carcinogenic trihalomethanes, both having the potential to cause serious risks to public health.

Three years later, the entire Tubbercurry area serviced by the plant, amounting to some 13,000 people, was placed on a boil water notice following the detection of cryptosporidium on routine testing.

"It was an extraordinarily bad public health situation because the cryptosporidium situation was going to be on repeat until the treatment plant was updated," explained Olwyn James, senior planning manager at Uisce Éireann, who has been involved in continuing efforts to balance the needs of thousands of water customers against the need to preserve the habitat of the whorl snail.

Cryptosporidium is a tiny parasite found in human and animal waste which, if ingested, can cause fever, stomach upset and diarrhoea. In severe cases, it can cause dehydration and death.

It is not an uncommon threat. According to a 2021 study at the Technological University of Dublin, infections have been recorded in 58 per cent of electoral areas and in all 26 counties.



Uisce Eireann's water treatment plant at Lough Talt, Co Sligo, is the natural habitat of the whorl snail

"When it's a public health issue like that, that is an instant priority for an organisation like Irish Water," explained Ms James.

Aware of the urgency, the utility applied for planning permission to Sligo County Council in 2015 to upgrade the Lough Talt facility but because it could not sufficiently demonstrate the works would not impact the whorl snail habitat, a European special area of conservation (SAC) at the adjoining Lough Hoe Bog, this was rejected, as was an appeal to An Bord Pleanála in 2017.

Separate analysis conducted by Uisce Éireann found the treatment plant would, in fact, cause drought conditions at the bog. For 95 days of the year, it would have to reduce water extraction by half in order to not pose a threat.

"Any fluctuation in the sogginess means the snail will die," Ms James said. "The snail has been missing in action since 2007 but the conservation objective was to restore the habitat to make it a constant level of contentedness for the snail [so that] should the snail return, it would thrive."

Hope eventually emerged in the form of an "imperative reasons of overriding public interest" clause that can assist a planning application with the promise of compensation measures. Given the urgent health concerns, and the fact an alternative public water source lay 30 to 40 kilometres away, this offered a potential solution but could only be decided by Sligo County Council.

"If we could bring the snail back, that would compensate for the snail being lost in the past. And then, we had to figure out a way to do that because it hasn't been done before," said Ms James.

Restoration of Whorl snail habitat

1972: Construction of the Lough Talt water treatment plant to supply Tubbercurry, Co Sligo and surrounding communities.

2007: Last known sighting of the whorl snail (vertigo geyeri).

2014: Establishment of Irish Water (now Uisce Eireann).

2015: Lough Talt placed on the Environmental Protection Agency's remedial action list due to concerns over cryptosporidium.

2015: Planning application to upgrade treatment facilities rejected by Sligo County Council due to European Special Area of Conservation (SAC) status, regarding whorl snail habitat.

2017: An Bord Pleanala rejects Uisce Eireann appeal.

2018: Renewed application sent to Sligo with hopes of exemption and habitat restoration.

2020: Completion of new treatment plant.

2026: Anticipated placement of "test" snail species, closely related to whorl snail.

2028: Anticipated reintroduction of whorl snail.

All going well, the whorl snail should be back in its natural habitat by early 2028. Illustration: Paul Scott

.th the help of mollusc expert Dr Evelyn Moorkens, a solution was designed that would see irrigation of the SAC area maintain suitable conditions, even with normal water extraction activity.

A revised planning application was granted. In 2020, Uisce Éireann began operating its upgraded treatment facility some five years after it first began attempting to address the problem.

Next year, a "test" snail closely related to Vertigo geyeri that is slightly more robust will be placed on site and monitored to see how it copes in the irrigated environment. Should that prove successful, as anticipated, the whorl snail population will be revived in its original home. Lough Talt is also to be replaced by another public water source.

A happy ending for the snail but possibly not the end of the story. With a shortage of the mollusc experts required to navigate similar conservation challenges, Uisce Éireann has now entered into a funding programme with Trinity College Dublin to produce more.

[Almost 500,000 people being served by 'at risk' water supplies, EPA warnsOpens in new window]

"There are other snails and other projects and it's likely that this is going to happen [again]."

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Mark Hilliard

Mark Hilliard is a reporter with The Irish Times

Opens in new window

While a specific 2013 construction report by

Dr. Evelyn Moorkens for the Strandhill Wastewater Treatment Plant (WWTP) is not publicly lexed as a standalone document, Dr. Moorkens is the leading expert who famously designed the conservation solution for the **Narrow-mouthed Whorl Snail** (*Vertigo angustior*) at that site.

Context of the Strandhill Report

In 2013, construction on the Strandhill WWTP was halted due to the discovery of *Vertigo angustior*. Dr. Moorkens was commissioned to address this challenge, leading to several key outputs:

- **Conservation Solution:** Dr. Moorkens designed a specialized **irrigation system** for the Special Area of Conservation (SAC) to maintain the precise hydrological conditions the snails require, allowing construction to eventually proceed.
- **Revised Planning:** Her findings and mitigation strategies were integrated into the revised planning application for the facility, which was eventually granted.
- **National Baseline (2011):** Prior to the 2013 construction halt, she co-authored the foundational Monitoring and Condition Assessment of Populations of Vertigo angustior in Ireland (Irish Wildlife Manual No. 55), which establishes the national monitoring standards used for the Strandhill site.

How to Access the 2013 Site-Specific Report

Since site-specific ecological reports for infrastructure projects are often held in planning or license files, you can find the specific 2013 documentation through:

1. **Sligo County Council Planning Office:** Search their Planning Online portal using the original WWTP application references.
2. **Environmental Protection Agency (EPA):** The EPA License Search for the Strandhill WWTP (License Reg: D0107-01) contains technical summaries and Natura Impact Statements (NIS) that frequently include Dr. Moorkens' expert appendices.
3. **Uisce Éireann (formerly Irish Water):** As the current operator of the facility, their project archive for the "Strandhill Wastewater Treatment Plant Upgrade" includes the environmental assessments conducted after the 2013 work stoppage.

The specific ecological reports for public infrastructure are summarized in planning documents, the full 2013 report by Dr. Evelyn Moorkens may not be "publicly available" as a standalone PDF for several common reasons:

- **Rare Species Protection:** Under the Access to Information on the Environment (AIE) Regulations, public bodies can limit access to information that could harm the environment, such as the exact **GPS locations of rare species** like

Vertigo angustior

.

- **Embedded in Larger Files:** These reports are often submitted as **appendices** to a larger Natura Impact Statement (NIS) or Environmental Impact Assessment Report

(EIAR). You may need to search for the parent document rather than the specific report title.

- **Administrative Transition:** In 2013, local authorities like Sligo County Council managed these projects before responsibility transferred to Uisce Éireann (formerly Irish Water) in 2014. Some older digital records may not have been fully migrated to newer public-facing portals.
- **Copyright & Intellectual Property:** Technical reports commissioned for specific planning applications are the property of the applicant or the consultant. While they are part of the public planning file, they aren't always distributed freely online like

- Uisce Eireann.
- Dept of Housing Heritage & Local Gov

Excerpts

Project Splitting Part 8.

Water concerns Uisce Eireann

- Aine Nic Amhlaoibh

Chief Executive's Report to the Members of Sligo County Council

as required by Section 179 (3), Part XI of the Planning and Development Act 2000 (as amended) in relation to the proposal to carry out public realm enhancement works at Strandhill village, County Sligo.



Part 8 2025 Strandhill Shore Rd

Ordinary meeting of Sligo County Council
7 July 2025 – Agenda Item no.X

An Roinn Forbartha Tuaithe agus Pobail
Department of Rural and Community Development
An Chláir um Athghiniúint agus Forbairt Tuaithe
Rural Regeneration and Development Fund
2040

Excerpts

Project Updates

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Appendices

A. Site Location Map and Site Layout Plan

B. List of individuals or organisations who made submissions or observations with respect to the proposed development.

C. Detailed summaries of each submission received from individuals and organisations along with the response of the Chief Executive

D. Memo from the Planning Section

E. Screening determinations

1.0 Introduction

This report is the Chief Executive's Report on the proposed Local Authority development at Strandhill involving the public realm enhancement of Shore Road and the Shore Front in the coastal village of Strandhill. Section 179(3) of the Planning & Development Act 2000 (as amended) requires that the Chief Executive submits a report to the members of the Council on the proposed development for their consideration.

The report should describe the nature and extent of the proposed development (including an appropriate plan of the development and appropriate map of the relevant area) and should also:

a) *evaluate whether or not the proposed development would be consistent with the proper planning and sustainable development of the area to which the development relates, having regard to the provisions of the development plan and giving the reasons and the considerations for the evaluation,*

b) *include the screening determination on why an environmental impact assessment is not required*

c) *list the persons or bodies who made submissions or observations with respect to the proposed development,*

d) *summarise the issues, with respect to the proper planning and sustainable development of the area in which the proposed development would be situated, raised in any such submissions or observations, and give the response of the chief executive,*

e) *recommend whether or not the proposed development should be proceeded with as proposed, or as varied or modified as recommended in the report, or should not be proceeded with, as the case may be.*

Following the consideration of the Chief Executive's report, the proposed development may be carried out as recommended in the report, unless the local authority, by resolution, decides to vary or modify the development, otherwise than as recommended in the CE report, or decides not to proceed with the development.

1.1 Project vision and aims

The Shore Front in Strandhill is a special place, boasting spectacular views of the wide Atlantic and offering visitors a unique proximity and exposure to the sound and sight of crashing waves. Over the past three decades, Strandhill has seen a surge in popularity, with thriving local businesses, a booming surf scene, and a growing demand for outdoor leisure and recreation.

But as the village has thrived, so too has the pressure on its public spaces—especially on the Shore Front. Sligo County Council has tried to facilitate the ever-increasing demand for space by increasing car parking and widening footpaths. However, it is clear, on a hot summer's day, there will never be enough parking spaces in Strandhill.

In the spirit of the national priorities of compact growth, active travel, town centre first and climate resilience as well as the increased focus on high quality public realm, Sligo County Council identified the Shore Front in Strandhill as a public area that needed a 're-imagining', a place where people come first.

The Shore Front has become a large car park dominated by both moving and stationary vehicles and the pedestrian-only space is limited. It can be a congested and confusing place on busy days especially for parents with small children and those with mobility issues who just want to walk the 'Promenade'. The sea-side footpath from kerb to wall may be 3m wide, but in reality those who walk might only have 1.5m when overhanging vehicles, street furniture and sitting people are taken into account. The public footpaths along the Shore Road are also restricted in width for pedestrians who often have to walk on the carriageway to make space for others.

Landscape architects were tasked with transforming the car park into a genuine Promenade while still retaining adequate spaces for those who really need them. Retaining the tradition of older people sitting in their cars, taking in the view, was an important aspect of the scheme as was increasing the safety and comfort levels of pedestrians while they are enjoying all that Strandhill has to offer. Visitors and locals should be able to surf, walk, dine, play, people-watch and socialise in comfort.

In order to realise this vision, people must be encouraged to use active travel or public transport to reach the Shore Front. Those who choose to drive and are able bodied should park in the Upper Car Park leaving the Shore Front spaces for drivers who really need them. This will require a behavioural change, but it is a change in the interests of the common good, a change that preserves the charm of the village and aligns with national goals for sustainable living. This will ensure that the village remains a 'go-to' place to live and visit for future generations.

Key goals:

- **Make walking safer and easier:** Reduce vehicle speeds and improve pedestrian links between Shore Road and the Promenade.
- **Create more space for people:** Expand and upgrade the pedestrian-only space along the Shore Front for use by locals, visitors, families, and older people.
- **Improve navigation and aesthetics:** Use high-quality materials, coordinated street furniture, and clear signage to enhance the flow of people and appearance.
- **Support local tourism:** Boost the village's appeal and capacity as a tourist destination.
- **Build climate resilience:** Incorporate Sustainable Drainage Systems (SuDS) and biodiverse coastal planting to respond to environmental challenges.

1.2 Source of Funding – Rural Regeneration and Development Fund (RRDF)

The project so far has been funded by the Rural Regeneration Development Fund. This is a fund administered by the Department of Rural and Community Development which supports projects that have the potential to revitalise rural towns and villages in line with the Town Centre First Policy. Projects should be focus on sustainable regeneration that will drive greater economic activity and footfall. Funded schemes should provide the necessary facilities and infrastructure in settlements, which will assist in attracting people to live, work and invest in rural areas.

This Part 8 process represents the culmination of the Preliminary Design Phase of the project. If the Part 8 is approved by the Members, Sligo County Council will apply for funding once again to the Department to carry out the detailed design for the project and ultimately to construct the scheme. During this stage there will be further consultation with the general public and with the key stakeholders and residents of Strandhill.

2.0 Public Consultation

Notice of the proposed development at Strandhill was advertised in the Sligo Weekender, on Thursday 27 February 2025 and plans of the proposed development were placed on public display for a four week period until the 27 March 2025 and were available to view online on the Sligo County Council consultation portal (www.consultsligococo.ie). A total of five site notices were erected on site. Submissions or observations could be made with respect to the development on or before 4pm 11 April 2025, either in writing or via the consultation portal. In total, submissions were accepted for a 6 week period. Notice was also given to prescribed bodes in accordance with Article 81 of Part 8 of the Planning and Development Regulations 2001 (as amended).

3.0 The nature and extent of the proposed development

The proposed works include the following:

Council (upper) Car Park

1. Reconfiguration, resurfacing and relining of the existing car park to create an additional 53 car parking spaces (323 spaces in total - including 17 accessible spaces) and 6 motor bike spaces.
2. Provision of new bus stop with enhanced seating and shelter for customers
3. Planting of ornamental shrubs and trees suitable for a coastal environment to soften the appearance of the car park from Shore Road
4. Provision of new road signage

Shore Road

1. The narrowing of Shore Road just beyond the Council car park to 3m for a defined section and the provision of a 'courtesy crossing' in order to encourage drivers to use the Council car park rather than continue down Shore Road to the Promenade. These measures mark the beginning of the traffic calmed and pedestrian priority zone
2. Reduction in the carriageway width of Shore Road to 5m and construction of wider footpaths for an enhanced, safer pedestrian experience
3. Repaving of the footpaths and carriageway in high quality materials suitable for the coastal location
4. Installation of new street furniture (benches and seating bollards to control 'ad hoc' vehicular parking), new wayfinding signage and high quality lighting columns

The Promenade (Shore Front)

1. Widening of the existing footpaths and reduction in width of the carriageway to create a high quality civic space and to slow down traffic
2. Introduction of maritime planting to function as rain gardens
3. Resurfacing of the promenade and roadway in high quality in-situ concrete paving to tie into the local materials and ensure durability from winter storms.
4. Provision of 42 no. car parking spaces on the Shore Front comprising 10 no. accessible spaces and 32 no. standard spaces, some of which may be short-term spaces and some of which may be age-friendly spaces)
5. Resurfacing and widening of the eastern footpath outside local businesses and the National Surf Centre and provision of 2 new loading bays serving these local businesses
6. Creation of a granite seating plinth at the northern end of the promenade, allowing for formal and informal seating
7. Relocation of the Cannon further up the Promenade, 57m to the south west to enhance its setting and to create a focal point on the new enhanced Promenade

The proposed works do not include any changes to the boundary wall which separates the existing promenade from the natural coastline. The works also avoid contact with the existing rock armour.

Appendix A provides a site location map and site layout plan of the project area. See the link below to plans and particulars of the scheme as available on the County Sligo Consultation Portal https://consult.sligococo.ie/en/consultation/strandhill-public-realm-enhancement

4.0 Referrals

4.1 Prescribed bodies

In accordance with the requirements of the Planning & Development Regulations 2001 (as amended) Part 8, Article 82(3), copies of the advertised documents were issued to the following prescribed bodies:

- Development Application Unit of the Department of Housing Local Government and Heritage - National Parks and Wildlife Services and National Monuments Services
- Uisce Éireann
- Failte Ireland
- An Taisce

Responses were received from the DAU and from Uisce Éireann. Please refer to Section 5 of this report for summaries of same and the Chief Executive's response.

4.2 Internal referrals

Copies of the advertised documents were also issued to the following sections within Sligo County Council:

- Planning / Roads and Infrastructure / Environment / Parks / Fire Authority / Town Regeneration Officer / Heritage / Biodiversity

A total of 3 responses were received from internal sections within Sligo County Council as follows:

Section	Comment
Environment Section	It is important to ensure that all construction waste associated with the development is disposed of in accordance with the requirements of national waste legislation.
Planning Section	The proposed development would be consistent with the policies and objectives of the CDP and with the proper planning and sustainable development of the area.
Area Office (Roads and Infrastructure)	No objections subject to the delivery of a Stage 2 Road Safety Audit. The Area Office looks forward to being involved in the detailed design should the Part 8 be approved and RRDF funding granted.

The report from the Environment Section contains standard comments in relation to waste disposal and the preparation of a construction and demolition waste management plan which will be prepared at the detailed design phase of the project.

6.0 Summary of issues raised in this public consultation

A total of 99 submissions were received and uploaded to the Sligo County Council online consultation platform.

Two submissions were received from prescribed bodies – DAU of the Department of Housing Local Government and Heritage (DHLGH) and Uisce Éireann .

Four submissions were received from public bodies/community organisations including the Age Friendly Alliance, Ireland Cycling Campaign, Sligo Cycling Campaign and the Strandhill Community Development Association.

Two submissions were received after the closing date as advertised on the public notices and the consultation portal. These are not considered in this report nor are they uploaded on the consultation portal.

Please refer to Appendix B for a full list of individuals and organisations who made submissions or observations in accordance with Planning & Development Act 2000 (as amended) Section 179 (3)(iii).

The content of the 99 submissions received can be categorised as follows:

No. of submissions which express support for the scheme including those which support the scheme and make suggestions for improvement (27)	49
No. of submissions which express concerns or object to the scheme	38
No. of submissions which neither express support or opposition to the scheme but raise other issues relating to Strandhill or to private property in Strandhill	6
No. of submissions which object to the scheme on the grounds of the relocation of the Cannon only	3
Submissions which mention public toilets only	1
Prescribed bodies	2
TOTAL	**99**

This section will summarise the submissions in terms of the key issues raised. The four issues raised most often were as follows:

(1) the reduction of car parking on the Shore Front
(2) the relocation of the Cannon
(3) the lack of public toilets in Strandhill
(4) coastal erosion

The Chief Executive's response to these four issues will be provided in this section.

Please see Appendix C for a summary of each submission and the response to same from the Chief Executive.

6.1 Reduction in car parking spaces

The majority of the submissions objecting or expressing concerns about the scheme cite the reduction of car parking spaces at the Shore Front as their main issue. Many of these objections are based on the perceived impacts for older adults and individuals with mobility impairments. Other submissions argue that the reduction in car parking spaces on the Shore Front will be bad for the village, change the atmosphere of the Shore Front and/or negatively affect local businesses.

Under the proposed scheme, 42 spaces will be retained on the Shore Front. The nearby Upper Car Park, which currently offers in excess of 250 car parking spaces is regularly used by visitors throughout the year, including during winter months. It is anticipated that these visitors will continue to do so.

A recent survey conducted over a sunny May weekend (10 and 11 May 2025) revealed that 18% of Shore Front spaces were occupied by the same vehicle for the entirety of Saturday. The percentage of long-term parking (over 4 hours) increased in the afternoon to 25% of existing car parking spaces. These findings highlight a significant issue with long term parking at the Shore Front. Addressing this behaviour would increase availability for those with legitimate access needs.

The proposed scheme is designed to encourage able bodied people to use the main Council Car Park and leave the Shore Front spaces for those who really need them. It is acknowledged that this will require a behavioural change amongst able bodied visitors and locals, who should use the Main Council car park rather than drive down to the Shore Front to look for a space. As evidenced by the recent survey referred to above, behavioural change will also be required on the part of people, possibly local workers, who park all day on the Shore Front. It is also hoped that visitors can be encouraged to use public transport and locals to cycle or walk to the Promenade.

6.2 The relocation of the Cannon

The relocation of the Cannon was raised in 28 submissions. Many submissions describe the importance of the Cannon to the people of Strandhill. All but two of these submissions (26 no. in total) object to or query its relocation.

The importance of the Cannon to the identity of Strandhill is acknowledged. The Cannon is proposed to be relocated circa 60m to the south. It is currently located c.6m from the existing bandstand structure and it was a considered decision to relocate the Cannon in order to emphasise its significance and improve pedestrian flow in the area. The idea is to enhance both its setting and the overall attractiveness of the Promenade by providing items of interest along the Shore Front.

It is not considered that this will change the character of Strandhill nor will it change the character of the Cannon itself. The Cultural Heritage Impact Assessment Report also concludes that moving the Cannon will have no impact on the character of the structure.

However, it is considered that the retention of the Cannon in its current location will not materially affect the proposed scheme with regard to realising its overall aspirations.

6.3 Public toilet provision in Strandhill

There were 27 submissions received calling for the provision of public toilets in Strandhill, with many suggesting that they should be provided in or on the grounds of the National Surf Centre.

The issue of public toilets in Strandhill is important and must be addressed by Sligo County Council. However, this scheme is a public realm enhancement project and the provision of public toilet facilities is not considered within the remit of the original application submitted to the RRDF for funding.

6.4 Coastal erosion in Strandhill

The issue of coastal erosion and in particular coastal erosion protection measures is a pertinent issue and was raised in 18 of the submissions received.

A 'Coastal erosion and flood risk management study' was prepared in 2024 for Strandhill. The report details the ongoing coastal erosion process and proposes two options for a coastal protection scheme. Following this plan, an application was lodged for €800,000 in funding to carry out initial protection measures was made to the Office of Public Works. In late March 2025, Sligo County Council received almost €30,000 to fund further studies on coastal erosion in Strandhill. This funding, sanctioned by the Office of Public Works, will support enhanced analysis and data collection to inform and strengthen the case for a major coastal erosion protection scheme and flood mitigation works in the area.

While it is acknowledged that coastal protection measures are critical for Strandhill, it does not follow that no other enhancements of Strandhill should progress. Enhancement of the public realm of Shore Road and Shore Front and coastal protection measures are not mutually exclusive and can occur in tandem or independently of each other from different funding sources. Coastal protection measures would not be funded by the RRDF.

6.5 Positive suggestions to be considered further at detailed design stage

Many submissions made suggestions as to how the scheme could be improved to better meet the needs of the local and wider community. Many of these suggestions are considered worthy of further consideration during the detailed design phase of the project. The following is a list of the suggestions that the Chief Executive confirms will be considered at the detailed design phase of the project:

1. The provision of electronic signage at the Upper Car Park indicating availability of spaces at the Shore Front
2. The use of the loading bays as short-term car parking spaces outside agreed loading times
3. The use of angled car parking spaces in lieu of perpendicular spaces and the inclusion of age-friendly parking spaces on the Shore Front
4. Provision of disabled parking spaces on the business side of the Promenade
5. Removal of the height barrier at the upper car park
6. Parking spaces accommodating campervans and mini-buses in the upper car park
7. Motor bike parking located near the main entrance
8. Provision of a disabled parking bay in lieu of one of the proposed loading bays
9. Consider the option of widening the southern footpath only on Shore Road
10. Give priority to cars entering and exiting the Upper Car Park over the lower half of Shore Road
11. Provision of moveable picnic benches, sheltered seating, solar powered public lighting, outdoor gym equipment, public art
12. Use of warm white LED bulbs in the public lighting
13. Replace the existing wall capping to better integrate the new design with the existing wall
14. Consider the type of bollards used on Shore Road in the context of annual events such as the Warriors Run
15. Preparation of a detailed Construction Management Plan including measures to minimise disruption to existing businesses and maintain access to the shoreline for walkers / surfers during the construction phase

7.0 Planning and policy context

The Council's attention is drawn to the Planning Report in **Appendix D** – attached, which has been endorsed by the Senior Executive Planner for Sligo County Council.

7.1 Consistency with the Zoning / Planning Context:

Sligo County Council seeks to ensure that the County's towns and villages are developed in a manner which retains and enhances their identity and character and creates pleasant and attractive places (Chapter 10 County Sligo Development Plan 2024-2030).

The scheme directly aligns with **Policy 19.3.4 Mixed Use zones - Shore Road and Promenade** and **Policy P-PR-1** as set out in the Strandhill Village Plan.

Having regard to the above, the nature of the development and the zoning and policies in the CDP, it is considered that the proposed development is consistent with the zoning objectives for the area.

7.2 The development would not adversely impact on the heritage value of the area:

Archaeology: The proposal has been the subject of an Archaeological Impact Assessment carried out by an archaeologist licensed by the Department of Housing, Local Government and Heritage. The report concludes that while the proposal is unlikely to impinge on the recorded archaeological sites and monuments, archaeological monitoring of ground works should be undertaken during the construction phase of the development. The DHLGH have concurred with this conclusion.

Built heritage: In the interests of urban design and enhancing the Promenade, it is proposed to relocate the Cannon to a point 57m to the west along the Promenade. The Cannon is a protected structure in the current Record of Protected Structure for County Sligo (RPS no. 102).

It is considered that relocating the Cannon 57m west along the Promenade does not constitute a change to the setting or character of this protected structure and this opinion is reflected in the Cultural Heritage Impact Assessment Report prepared by Moore Archaeological and Environmental Services LTD.

The DHLGH have not commented on the proposed relocation of the Cannon.

The issue of compliance with the Habitats Directive and impacts on Natura 2000 sites is addressed in **Section 8** of this Report.

7.3 The development will not adversely impact upon visual amenity:

The coastline defining the village is classified as a visually vulnerable area in the CDP. The CDP seeks to protect the physical landscape, visual and scenic character of County Sligo and seeks to preserve the County's landscape character (**P-LCP-1**). **P-LCP-2** seeks to discourage any developments that would be detrimental to the unique visual character of designated Visually Vulnerable Areas.

The proposed development proposes a reconfiguration of the Shore Road and the Shore Front in order to make more space for pedestrians. The proposal involves repaving of roads and footpaths and more landscaping and street furniture, in particular seating. It is anticipated that the proposal will significantly improve the visual amenity of the area.

There are no concerns regarding the visual impact of the proposed development.

7.4 The development would be consistent with traffic, transport and mobility policies:

Section 19.3.5 of the Strandhill village plan for Strandhill (as contained in the CDP 2024-2030) sets out the Council's objectives relating to transport, circulation and parking for Strandhill.

Section 19.3.5 D: *Support the implementation of traffic-related schemes within the village, including:*

- realignment and upgrading of road junctions and footpaths.

- provision of new footpaths and cycle lanes;

- traffic calming measures and road drainage;

- road signage from the Knocknarea walk/Sligo Rugby Club on the R-292 to the junction with Buenos Aires Drive;

- road signage from the R-277/R-292 roundabout extending to the Promenade and to the Airport Road.

Section 19.3.5 E: *Reconfigure the Council Car Park on Shore Road and increase the number of car parking spaces available to facilitate the proposed public realm enhancement works at the Promenade.*

The proposed development is consistent with these objectives.

Having regard to the above it is considered that the proposed development would be in accordance with the traffic, transport and mobility policies of the Development Plan.

The Roads Section have been closely involved in the development of this scheme. The scheme will provide much needed traffic calming, traffic management and will ultimately improve the environment for pedestrians, vulnerable road users and for all visitors to Strandhill.

7.5 The development would not adversely impact on residential amenity

The proposed upgrading to the public realm of Shore Road (which contains several residential dwellings) is expected to have a positive impact on residential amenity by improving the setting of people's homes and generally having a beneficial impact on the prosperity of the village.

Unavoidably, there will be some inconvenience caused during the construction phase of the development though this will be short lived and appropriately managed to limit impact.

Having regard to the above, it is not considered that the proposed development will have any long term adverse impacts on residential amenity.

8.0 Environmental Assessments

8.1 Requirements of the Habitats Directive:

A Stage 1 Screening Appropriate Assessment was completed by LUC – the consultants overseeing this project. The AA Screening Report was included in the documents that went on public display as part of the application.

A screening report provides the information required by Sligo County Council to determine the potential significant effect of the proposal on the neighbouring Natura 2000 sites, potential impact on the integrity of the site and facilitates a decision by the Council in compliance with Article 6 of the EU Habitats Directive and regulation 42 of the 2011 Habitats Regulations.

The Appropriate Assessment Screening Report in assessing the potential impact of the development on its own or in combination with other developments has determined that the proposed development will not have an impact on any Natura 2000 sites and has therefore determined that a Stage 2 Appropriate Assessment is NOT required in the case of this development.

Sligo County Council has had regard to this Screening Report and has determined that the proposed development is not likely to have potential impacts, whether direct, indirect or cumulative/in-combination, which could give rise to adverse effects on the qualifying interests or the conservation objectives of Natura 2000 sites, and that the integrity of these sites will not be affected (See Appendix E for details of the AA determination).

8.2 Requirements of the Environmental Impact Assessment (EIA) Directive:

Sligo County Council has concluded, pursuant to Art.120 of the 2001 Regulations as amended, that an Environmental Impact Assessment is not required for this proposed development.

See Appendix E of this report for the SCC Screening Report and SCC Determination on the need for an Environmental Impact Assessment Report (EIAR) for the proposed public realm enhancement project at Strandhill, County Sligo.

9.0 Chief Executive's recommendation to the members of Sligo County Council

In the words of one respondent to this public consultation, *'this project presents a valuable chance to rethink how we use one of the most beautiful and unique public spaces in Ireland'*.

The vision for the scheme at the outset was to strengthen Strandhill's position as a special coastal destination enjoyed by all members of the local and wider community. The aim was to create a safe, welcoming and attractive environment where a broad range of activities—such as surfing, walking, sitting, playing, people-watching, and dining—could be enjoyed by all. Central to this vision is the prioritisation of people within the public realm, ensuring they feel relaxed, comfortable, and connected to the space and the stunning sea and landscape.

The scheme has been shaped through multiple phases of public consultation and represents a carefully considered compromise that incorporates the views and preferences expressed in hundreds of submissions. Many of the suggestions received in this public consultation have been noted for further exploration should the project advance to the detailed design stage.

The proposed development will preserve what makes Strandhill special while making sure it can be enjoyed safely and sustainably for generations to come. In addition to its local significance, the project aligns with national policy objectives including active travel, climate resilience, compact growth, and the Town Centre First approach.

In accordance with Section 179(3)(b)(v) of the Planning and Development Act 2000 (as amended), and having had regard to:

- the plans and particulars of the scheme;
- the submissions received from the public and prescribed bodies;
- the reports received from internal sections of Sligo County Council;
- the provisions of the Sligo County Development Plan 2024-2030;
- having determined that a Natura 2000 Appropriate Assessment is not required under the European 92/43/EEC (Habitats Directive);
- having determined that Environmental Impact Assessment is not required under the EIA Directive; and
- the proper planning and sustainable development of the area.

It is hereby recommended that the proposed development should proceed as proposed in accordance with the drawings and particulars contained in the Part 8 application which went on public display on 27 February 2025.

NOTE: The members are advised that following the consideration of the Chief Executive's report, the proposed development may be carried out as recommended in the report, unless the local authority, by resolution, decides to vary or modify the development, otherwise than as recommended in the CE report, or decides not to proceed with the development.

Appendix A

Site Location Map and

Site Layout Plan





Appendix B

List of the individuals or organisations who made submissions or observations with respect to the proposed development.

List of individuals and organisations that made submissions or observations on the Part 8 Public Realm Enhancement Scheme for Strandhill, Co.Sligo.

A total of 99 submissions from the general public and prescribed bodies were received from the following individuals and organisations:

No.	Date received	Name	Submitted by (if relevant):
1	01/03/25	Sarah Keating	
2	01/03/25	Kevin Doyle	
3	03/03/25	Gary Byrne	
4	01/03/25	Therese Kelly	
5	01/03/25	Eamonn Leamy	
6	04/03/25	Denise Burns	
7	05/03/25	Paul Barr	
8	05/03/25	Fergal Chambers	
9	05/03/25	Kim Nicholson	
10	06/03/25	Amber O'Doherty	
11	06/03/25	D Cureton	
12	06/03/25	Sinead Mc Goldrick	
13	06/03/25	Dearbhla Gowen	
14	07/03/25	Jane Chambers	
15	07/03/25	Ronan Keane	
16	07/03/25	Gavin Gray	
17	07/03/25	Geraldine Mousa	
18	07/03/25	Eamon Scoby O Grady	
19	08/03/25	Suzanne Togher	
20	08/03/25	Jacqui Carty	
21	08/03/25	Keith Coogan	
22	08/03/25	Paul Reilly	
23	08/03/25	Maura McMorland	
24	10/03/25	John Foy	
25	11/03/25	Jaki Ronan	
26	07/03/25	Lee Hancox	

No.	Date received	Name	Submitted by (if relevant):
27	09/03/25	Sally Siggins	
28	11/03/25	Noel Kennedy	
29	10/03/25	James Glynn	
30	13/03/25	Mary Kilfeather	
31	13/03/25	Vivienne Ryan	
32	13/03/25	Neil and John Byrne	AOK Design Studio
33	14/03/25	Paragon Byrnes LTD	AOK Design Studio
34	14/03/25	Swell Ocean Waves LTD	AOK Design Studio
35	16/03/25	Adrian Kenny	
36	20/03/25	Ciara O'Connell	
37	20/03/25	Carol Farry	
38	20/03/25	Neil Walton	
39	18/03/25	Tony and Mary Moran	
40	17/03/25	Noreen Noonan	
41	21/03/25	AOK Design Studio	Adrian Kenny
42	24/03/25	Shane Neary	
43	22/03/25	Jeanette Carty	
44	27/03/25	Annabel Gilmartin	
45	28/03/25	Emma Barry	
46	28/03/25	CCMD Developments LTD	Robert Kerans Consulting
47	29/03/25	Jan Steiner	
48	29/03/25	Cara Osbourne	
49	31/03/25	Strandhill Community Development Association	David Mc Coy
50	31/03/25	T. Dermody	
51	22/03/25	Ann Kenny	
52	31/03/25	Elisabeth Doran	
53	27/03/25	Department of Housing, Local Government and Heritage	Simon Dolan, Development Applications Unit.
54	1/04/25	The Building Block	
55	1/04/25	Peter Osbourne	
56	2/04/25	Akash Rastogi	
57	2/04/25	Finola Doran	

No.	Date received	Name	Submitted by (if relevant):
58	3/04/25	Peter Tiernan	
59	4/04/25	Dan Walsh	
60	5/04/25	Olive Henry	
61	7/04/25	John Flanagan	
62	7/04/25	Tony Osbourne	
63	2/04/25	Ronan Gilroy	
64	2/04/25	Ann-Marie Hall	
65	08/04/2025	Ruth Hegarty	
66	09/04/2025	Stephen Taylor	
67	09/04/2025	Kieran Mc Grath	
68	09/04/2025	Age Friendly Ireland	Meath County Council
69	11/04/2025	Gemma Woods	
70	10/04/2025	Ronan Marren	
71	11/04/2025	James O'Reilly	
72	11/04/2025	Eilish Mannion	
73	11/04/2025	Tanja Studer	
74	11/04/2025	Charlie Elliot	
75	11/04/2025	Pamela Kivlehan	
76	11/04/2025	Aine Nic Amhlaidh	
77	11/04/2025	David Mead	
78	11/04/2025	Micki Murray	Public Relations Officer of The Warriors Run Committee
79	11/04/2025	Wayne Farry	
80	11/04/2025	Phil Osbourne	
81	11/04/2025	Trevor Farry	
82	11/04/2025	Sligo Cycling Campaign	
83	11/04/2025	Irish Cycling Campaign	Colm Ryder
84	11/04/2025	Noel Raftery	
85	11/04/2025	Johnston Byrne	Lisa Mc Sharry
86	11/04/2025	Joan Swift	
87	11/04/2025	Una l'Estrange	
88	11/04/2025	Helen Dolan	
89	11/04/2025	Strandhill Golf Club	Anthony Skeffington

No.	Date received	Name	Submitted by (if relevant):
90	11/04/2025	Mike Clancy	
91	11/04/2025	Emily Gaine	
92	10/04/2025	Mary Flatley	
93	10/04/2025	Jack O'Doherty	
94	10/04/2025	Kevin Connell	
95	10/04/2025	Ryan Farry	
96	11/04/2025	Patsy Prior	
97	11/04/2025	Enda Eames	
98	11/04/2025	Laura, John, Breda Gaynor	Laura Gaynor
99	01/04/2025	Uisce Eireann	Emmett Hegarty

Submission 99 – Uisce Éireann
Summary of issues
Uisce Éireann note that there are existing sewer and water pipes in the development area that may potentially be impacted by the development and these have not been acknowledged in application documents. Uisce Éireann advise that they cannot permit build over of its assets and the separation distances as per their standard Codes and Practices must be achieved. The report also advises SCC that development proposals should not impact public drinking water sources.
Chief Executive's Response
Uisce Éireann's comments are noted. The proposed development is essentially a public realm enhancement scheme (re-paving and re-configuring of existing hard surfaced areas) designed to prioritise pedestrians over the private car. The majority of the site area is already covered in hard surfacing. A topographical survey of the site was carried out in February 2022 indicating the location of all services underneath the surface. The scheme will not impact any public drinking water sources. Further consultation will take place with Uisce Éireann during the detailed design phase of the project.

5.0 Summaries of issues raised by prescribed bodies and the Chief Executive's Response

Two submissions were received from prescribed bodies – DAU of the Department of Housing Local Government and Heritage (DHLGH) and Uisce Éireann .

DoHPLG

Submission 53 – Department of Housing, Planning and Local Government
Sum maryof issues
Issue 1 – NatureConservation
TheDHLGH recommends the following: 1. The preparation of an Ecological Impact Assessment for the proposed development. 2. The submission of a sensitive Lighting Plan to ensure minimisation of light pollution. 3. The use of porous car park surfaces and hard standings where possible, using loose local substrate or a permeable paving system such as *grasscrete* car parking areas. All car park s and green areas should have sufficient planting of native species to provide ecological be nefit, shade and help to offset the effects of climate change and as a nature- based solution to air and water pollution, while providing food plants for wildlife. 4. The submission of a landscape plan outlining native planting, SUDS and rain garden desig n[xii] and flood risk management.
Issue 2 - Archaeology
The Department concurs with the recommendation as outlined in Section 3 [of the Plannin g report] and recommends that licenced archaeological monitoring be carried out during th ecourse of groundworks.
Chief Executive's Response
The comments from the DHLGH are noted and agreed. All these issues will be ad dressed appropriately at the detailed design phase of the project.

Submission no. 76 – Aine Nic Amhlaidh

Summary of issues

The submission argues that the proposed public realm enhancement works requires an Environmental Impact Assessment for several reasons as detailed in the submission: Proximity to an SAC/ proximity to a National Heritage Monument/ proximity to Marram Grass Dunes/ the presence of a special orchid species and the whorl snail in the area/ sensitivity to coastal erosion.

The submission argues that Sligo County Council is required under EU Habitats and Birds Directive to fully environmentally assess all Development Proposals, this includes assessing for development impact on protected species and assessing the impact on humans.

Other points raised in the submission include:

1. The unprecedented and unsustainable volume of visitors to Strandhill.
2. The Waste Water Treatment Plant in Strandhill:
   a) The WWTP has been using unlicensed waste treatment provider to clear the excess waste two times weekly since it opened in 2021.
   b) The stated Waste Water Capacity as per the County Development plan is misleading.
   c) The submission questions the safety of the water for surfers noting that the '*level of Ammonia being disposed to sea has exceeded the National limit since the opening of this plant*'.
   d) These waters are classified as 'shellfish waters' given the fact that they support the hugely successful Oyster Shell Fish Farm also within 500 m of the waste water treatment plant.
   e) *'The shocking devastation of the salmon population, decimated last summer in Ballisodare bay is an indicator that the sewage and waste being disposed is a risk to human life'*.
3. The proposal ignores the needs of the most vulnerable in our community, the young, the elderly and disabled. The proposal also ignores the views of the residential community in Strandhill.
4. Children need to be able to get to their parent's car quickly. It has been proven that they are at risk of hypothermia given their physiology.
5. It is impossible to monitor surfing children and non-surfing children without shore front access to see the sea.
6. Access to the foreshore cannot be denied to the community according to the law. This proposal denies access and it is '*dishonest and disrespectful to claim that blue sticker parking will suffice*'.
7. Strandhill is not currently listed as having a special tourism function in the current Sligo County Development Plan. '*The removal of this designation has facilitated the council increasing the housing density for residential purposes. The wastewater treatment plant and the environment cannot cope with the influx of tourists*'.
8. *'It would appear that Sligo County Council has a mandate to turn Strandhill into a Tourism Industry without regard for the infrastructure or the needs of the local community, children, families, the elderly, the disabled, those who are most vulnerable*'.
9. This proposal will encourage anti-social behaviour by having '*public areas cut off from a flow of traffic*'.

Aine Nic Amhlaidh recommends that this proposal be refused.

9. To avoid loss of valuable parking spaces, a dedicated and clearly marked area for the beach warden's hut should be incorporated into the plan.
10. The number of public bins currently in place is insufficient during high-traffic periods.
11. The proposal must also consider local businesses to ensure they are not adversely impacted by the changes.

Chief Executive's Response:

The comments from **Pamela Kivlehan** are noted and addressed below:

1. The possibility of converting one of the proposed loading bays into an accessible space will be explored at detailed design stage.
2. The issue of electronic parking signage will be considered further at detailed design stage. The location of the car parking at the **northern end of the Promenade** was initially considered however it was felt that the wider pedestrian spaces should be located in front of the businesses in order to maintain a sense of vitality and vibrancy. Locating a large pedestrian area in the southern end of the Promenade runs the risk of the space being unused for much of the year.
3. The issue of the enforcement of parking spaces is an issue for a potential future management plan for Strandhill.
4. 10 disability spaces are proposed out of a total of 42 spaces. This represents a 24% allocation of spaces designated as disabled parking spaces. The existing car park has 8 accessible spaces representing just 8% of overall parking spaces.

   The Sligo County Development Plan 2024-2030 requires that car parking be provided for the disabled and mobility-impaired in accordance with the document *Building for Everyone 1 – External Environment and approach*, published by the National Disability Authority in 2012. This document recommends a provision of 6% of the total capacity of a car park serving shops, leisure facilities and other building to which the public has access.
5. The current proposal represents a compromise between opposing views expressed during previous consultations on the project. If the 42 spaces are left for people who really need them, then it is considered sufficient to cater for those with mobility impairments who would find the walk too difficult. Increasing the amount of spaces on the Shore Front would significantly reduce the beneficial impacts of the scheme.
6. The issue of campervans overnighting on the Shore Front could be an issue for any potential future Management Plan for Strandhill and is not an issue for this scheme.
7. The provision of a multi storey car park is not considered to be an answer to car parking in Strandhill. There will never be enough spaces. The solution to car parking 'shortages' in Strandhill must involve public transport or active travel measures.
8. Please see **Section 6.3** of this report for the Chief Executive's response to the issue of public toilets.
9. The issue of a beach warden's hut could be examined at detailed design stage.
10. The issue of public bins will be examined further at detailed design stage.
11. The proposal has considered local businesses to ensure they are not adversely impacted by the changes. Parking spaces have been increased in response to their feedback. Two new loading bays have been proposed to assist with deliveries. Public realm enhancements around the world have been shown to have positive impacts on local economies. It is considered that this scheme will have a beneficial impact on all the local businesses at the Shore front and along Shore Road.

Chief Executive's Response:

The comments from **Aine Nic Amhlaidh** are noted and addressed below:

A screening for Environmental Impact Assessment was undertaken with respect to this development. Sligo County Council determined that there is no real likelihood of significant effects on the environment arising from the proposed development and that an Environmental Impact Assessment (EIA) is not required.

1. The proposed scheme will not in itself have any influence on the number of visitors to Strandhill. Its purpose is to improve safety and comfort levels for both visitors and residents of Strandhill.
2. The issue of the Waste Water Treatment Plant in Strandhill is not directly relevant to this project.
3. The current proposal has had careful regard to all the views expressed during several rounds of public consultations on this project. The project as currently proposed presents a reasonable compromise between opposing views and strives to meet the needs of all visitors to and residents of Strandhill.
4. 42 spaces are proposed at the seafront. These spaces should be used by those who need them most. The walk from the Council car park to the Shore Front takes between 2 and 4 minutes depending on where one is parked.
5. As will be apparent from the drawings of the proposed enhancements, access to the foreshore is not being prevented.
6. See above.
7. As per Chapter 19 of the current Sligo County Development Plan, Strandhill is a village designated as having 'special coastal tourism functions'.
8. The aim of the project is to put people first so as to enhance the experience for everyone on Shore Road and on the Shore Front.
9. As will be apparent from the drawings, there are no areas which are '*cut off from a flow of traffic*'. The plans merely provide for wider footpaths throughout the area enabling comfortable two-way pedestrian traffic, comfortable seating and play opportunities for both old and young.

Submission no. 77 – David Mead

Summary of issues

David Mead supports the general idea of the improvement and makes the following suggestions:

1. Given that it is accessible when businesses might be closed, public toilets (preferably with hours like 10am to 8 or 9 pm) should be provided.
2. The provision of sheltered seating with wind break (similar to ones by Cannon which do needs refurbishment) would be welcomed.
3. The iconic Cannon should be kept in-situ *'rather than banishing it to the end. It is a great meeting point'*.
4. A better bus service with a sheltered bus stop is needed. The time between bus services from Sligo Town to Strandhill is too long.

Chief Executive's Response:

The comments from **David Mead** are noted and addressed below:

1. Please refer to **Section 6.3** of this Report for the Chief Executive's response to the issue of public toilets.
2. This idea is noted and has been mentioned in several submissions. This is an issue which will be considered at the detailed design phase of the project.
3. Please refer to **Section 6.2** of this Report for the Chief Executive's response to the issue of the relocation of the Cannon.
4. The frequency of bus services is a matter entirely for the NTA/Bus Eireann and not Sligo County Council.

Sligo County Council
Comhairle Chontae Shligigh

Sligo.

Chief Executive's Report

recommending a Variation of the Sligo County Development Plan 2024-2030

on foot of the Section 28 Guidelines for Planning Authorities titled "*NPF Implementation – Housing Growth Requirements*" (2025), which replace the "*Housing Supply Target Methodology*" (2020)

Sligo County Council
Development
Planning Unit

25 November 2025

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Executive Summary

On 29 July 2025, the Minister of State for Local Government and Planning, John Cummins, sent a letter to the Chief Executive of Sligo County Council in relation to the Section 28 Guidelines entitled ***"National Planning Framework (NPF) Implementation – Housing Growth Requirements"***, which had been issued one day earlier, on 29 July 2025.

The Minister of State indicated that *"there is now an urgent need for development plans to be updated to reflect the requirements of the recently approved Revised NPF in respect of housing"* and requested that *"planning authorities use all available means to incorporate new housing growth requirements within development plans as quickly as possible"*, prioritising the updating of county development plans to reflect the requirements of the Guidelines.

The purpose of this Chief Executive's Report, as recommended by the Housing Growth Requirements (HGR) Guidelines, is to outline to the Elected Members how it is proposed to secure the objectives of these recent Section 28 Guidelines and of the Revised NPF. The Report contains:

- an outline of the HGR Guidelines and their implications for the current Sligo County Development Plan 2024-2030 (CDP);
- a high-level assessment of the CDP in terms of its compliance with the HGR Guidelines (Core Strategy, Settlement Strategy, Zoning Objectives);
- a quantitative assessment of the adequacy of existing zoned lands to cater for the housing growth requirements;
- a brief description of the available options for implementing the objectives of the HGR Guidelines;
- the Chief Executive's recommendation regarding the preferred manner of addressing the requirements of the Guidelines;
- the recommended contents of a Proposed Variation;
- the estimated timeframe for completing a Development Plan variation.

In essence, it is recommended that Sligo County Council vary its development plan in the following manner:

I. replace the contents of CDP **Section 3.1.3 Consistency with national housing supply targets** with appropriate wording to reflect the replacement of the Housing Supply Target allocation (2020) with the new Housing Growth Requirements target (2025), as per the S. 28 HGR Guidelines.

II. delete **Table 5.2 Adjusted total housing demand in Co. Sligo during the Development Plan period** from CDP Chapter 5 Settlement Strategy (Vol. 1 of the CDP), because it has become redundant as a consequence of the 2025 HGR Guidelines replacing the S. 28 Housing Supply Target Methodology Guidelines (2020).

III. amend the **Strategic Land Reserve Policies** included in **CDP Volume 2, Chapter 10 Urban development principles** to unlock ~~additional housing within the County~~.

IV. **rezone two sites** in accordance with the Planning Authority's determinations on submissions RZLT 25-01 and RZLT 25-02 received in 2025 following public consultation on the Residential Zoned Land Tax (RZLT) draft map.

Copies of this report are to be provided to the Minister for Housing, Local Government and Heritage, and to the Office of the Planning Regulator.

1. Background to the Proposed Variation

1.1. Purpose of the Section 28 "Housing Growth Requirements" Guidelines

The **Housing Growth Requirements (HGR) Guidelines** set out the housing demand scenario to 2040 for each local authority by translating the requirements of the National Planning Framework Revision (2025) into estimated average annual figures.

The new Guidelines replace the *Housing Supply Target Methodology Guidelines* (2020), which previously provided detailed instructions for each local authority's calculations of their respective housing demand.

The HGR Guidelines specify the new annual housing growth requirements in the following manner:

Local Authority	Existing annual 2020 housing requirement (Housing Supply Target)	Adopted Development Plan – annual housing requirement (Housing Supply Target)	**New annual housing growth requirement to 2034**	New annual housing growth requirement to 2040
Sligo	468	672	**672**	585

1.2 Implementation of the new housing targets

The Guidelines contain three "Policy and Objective" statements, requiring the following:

- that the housing growth requirements for each planning authority (set out in Appendix 1 of the Guidelines) are reflected in the relevant City or County Development Plan (*Policy and Objective 1*);
- that 'additional provision' of up to 50% over and above the housing growth requirement for each local authority is reflected within the relevant City or County Development Plan (*Policy and Objective 2*);
- that planning authorities should use all available means to ensure that the objectives of these Guidelines are incorporated within development plans as quickly as possible through the variation of the current adopted development plan (*Policy and Objective 3*).

Each planning authority is required to assess its current development plan, to determine whether the lands zoned for residential use in the plan can accommodate the specified housing targets plus up to 50% additional provision. If this is not the case, the plan needs to be varied.

The assessment should involve the review of:

A. **the Core Strategy** – which sets out the total (county) and settlement-specific population and housing allocations;

B. **the Settlement Strategy** – which indicates where growth should be supported;

C. **the zoning objectives** – e.g. the amount of land zoned for residential and mixed uses (including residential) as well as the location of such lands (which determines the acceptable average residential density), to identify the lands' development potential;

D. **the application of "additional provision"** of up to 50% over and above the housing growth requirement.

*The Guidelines imply that **up to 50% more land should be zoned** in addition to the minimum area necessary to accommodate the housing targets. **'Additional provision'** recognises the fact that, for a*

*variety of reasons, a relatively significant proportion of zoned lands are not activated over the period of a development plan. This application of the "additional provision" requirement involves the identification of **additional** lands suitable for residential zoning.*

The above assessment should determine whether the Development Plan is able to accommodate the required 150% of the housing targets. If this is not the case, the Plan will have to be varied, regardless of the stage in its life.

1.3 Housing capacity of lands zoned in the adopted Sligo CDP 2024-2030

The Core Strategy Table (Section 3.3) in Chapter 3 (Core Strategy Statement), Volume 1 of the CDP (Interim Version, published on 11 November 2024), indicates a total County housing allocation of 4,029 units by 2030, which is equivalent to **671.5 units (672 rounded up)** for each of the six years of the Plan's life.

> **The total CDP annual housing allocation (housing supply target calculated as per the Housing Supply Target Methodology Guidelines) is the same as the "new annual growth requirement to 2034" – 672 units.**

In the adopted Plan, Sligo County Council zoned **205 ha** for residential uses, i.e. **89.7 hectares in addition to the minimum 115.3 hectares** necessary to deliver the housing allocation. In area terms (hectares), the additional zoning represents an "additional provision" of **77.8%,** which is more than the "up to 50%" specified by the Guidelines.

The resulting housing capacity of all lands with housing potential (100% of lands zoned residential and 50% of lands zoned for mixed uses) was calculated at **6,025 units**, equivalent to **1,004 units for each of the 6 years** of the Plan's duration, which is equivalent to **149.4%** of the "new annual growth requirement to 2034".

> **The housing capacity of lands zoned for residential and mixed uses in the adopted CDP ensures an "additional provision" of 49.4% above the new housing growth requirement.**

1.4 Effects of the Draft Ministerial Direction

The County Development Plan 2024-2030 was made by the Members of Sligo County Council on 30 September 2024 with 40 amendments which were contrary to the recommendations of the Office of the Planning Regulator.

The Regulator, after being notified by the Council, informed the Minister that "*the County Development Plan has not been made in a manner consistent with recommendations of the Office*" and recommended the exercise of the Minister's functions "*under the relevant provisions of section 31 of the Act taking such steps as to rectify the matter*".

On 8 November 2024, Alan Dillon, the Minister of State for Local Government and Planning, gave notice of his intention to issue a direction to Sligo County Council to take certain measures regarding the Sligo County Development Plan 2024-2030, consequent to a recommendation made by the Office of the Planning Regulator on 27 October 2024.

The Draft Direction requested Sligo County Council to delete one zoning objective, reverse 21 amendments to zoning and omit one amendment from the text of the adopted County Development Plan.

The Draft Ministerial Direction affects **55.03** hectares of land (11 sites) zoned for residential uses in the following settlements:

- Sligo Town - 5 sites, 43.68 ha in total
- Enniscrone – 3 sites, 2.86 ha in total
- Ballysadare – 2 sites, 4.47 ha in total
- Strandhill – 1 site, 4.02 ha

As a consequence of the Draft Direction, the adopted zoning of the affected sites has not come into effect. In accordance with Section 31(6)(b) of the Planning and Development Act 2000 (as amended), the effective zoning of the sites subject to the Draft Direction is the same as in the previous Development Plan (Sligo CDP 20 2023/24).

This means that some RES and MIX sites revert to their previous SLR designation, others revert to GB (green belt) zoning, and one piece of land reverts to TOU (tourism) zoning, resulting in the following changes:

- **Before** the Draft Direction, the lands zoned in the CDP included 205 ha RES + MIX and 181 ha SLR;
- **After** the Draft Direction, the effective zoning in the CDP includes 150 ha RES + MIX and 218 ha SLR.

At the time of drafting this Report (November 2025), the Minister had not yet issued a Final Direction.

Should the Final Direction require the dezoning of all the affected sites, there would remain an **additional provision of 34.67 ha** of land suitable for housing (89.7 ha excess zoning minus 55.03 ha dezoned lands), representing **30% more than the area required** to deliver the new (equal to existing) annual housing requirement to the end of the Plan's life.

The 34.67 ha would cater for circa 1,213 housing units (considering an average density of 35 units/ha), thus falling short of the 2,016 additional provision which would represent 50% above the target of 4,032 units.

1.5 Implications for the CDP

It is evident that, as a consequence of the Draft Direction, the CDP is not currently able to ensure an additional provision of up to 50% more land zoned, or to cater for 150% of the new housing targets, as required by the HGR Guidelines.

An assessment of the CDP in terms of its compliance with the HGR Guidelines indicates the need for a variation. Below is a summary of this assessment.

1.5.A Core Strategy

The Core Strategy Table (Table 3.2 in Section 3.3 of the CDP) indicates that the adopted Plan set a County housing target/allocation of 4,029 units for the period 2024-2030 (671.5 units per year) and zoned 205 ha for residential use (77.8% excess zoning), with a total capacity of 6,025 units (49.5% above the housing target).

In light of the new housing target of 4,032 units and "additional provision" of zoned land providing capacity for up to 6,048 units, the Core Strategy Table included in the adopted Plan does not require modifications, other than replacing the wording "HST allocation" (Housing Supply Target allocation) with "HGR target" (Housing Growth Requirements target).

Given the ongoing uncertainty regarding the effects of the Final Direction on the total amount of land zoned for residential development, it is not considered opportune to modify the Core Strategy Table by means of a variation. **The Core Strategy Table shall be updated upon completion of the variation procedure and receipt of the Final Ministerial Direction, to reflect accurately the quantum and distribution of housing land throughout the County.**

However, the Core Strategy Statement (Chapter 3) should be amended – through the variation procedure - by replacing the Housing Supply Target allocation with the new Housing Growth Requirements target, to ensure full formal compliance with the S. 28 HGR Guidelines. The relevant part is **Section 3.1.3 Consistency with national housing supply targets. All other figures and statements related to Section 3.1.3 shall be updated as part of the final version of the CDP (after the receipt of the Final Ministerial Direction).**

1.5.B Settlement Strategy

The established settlement structure of County Sligo has remained largely unchanged since the 1990s. The settlement hierarchy, based on the towns' and villages' current roles and functions, does not require any modifications in light ofthe new housing targets.

However, as the method previously recommended for calculating housing demand was effectively abolished when the S. 28 Housing Growth Requirement Guidelines replaced the 2020 Housing Supply Target Methodology Guidelines, **Table 5.2 Adjusted total housing demand in Co. Sligo during the Development Plan period has become redundant and should be deleted from Chapter 5 Settlement Strategy.**

Any figures or statements relating to Table 5.2 shall be updated as part of the final version of the CDP (after the receipt of the Final Ministeria lDirection).

1.5 C Zoning obje ctives

The HGR Guidelines require a review of the amount of land zoned for residential and mixed uses (including residential) as well as the location of such lands (which determines the acceptable average residential density), to identify the lands' development pote ntial.

The Sligo CDP 2024-2030 is just over one year old, so **a full review of the amount and location of residential zoned land is not warranted.** The zoned lands' development potential is explicitly stated in each individual town and village plan, in Volume 2 of the CDP, Chapters 11 to 22 (12 settlement plans in total).

As already mentioned above, the adopted Co re Strategy Table demonstrates that the adopted zoning objectives ensure the provision of sufficient land to meet 149.5% of the new ho using target.

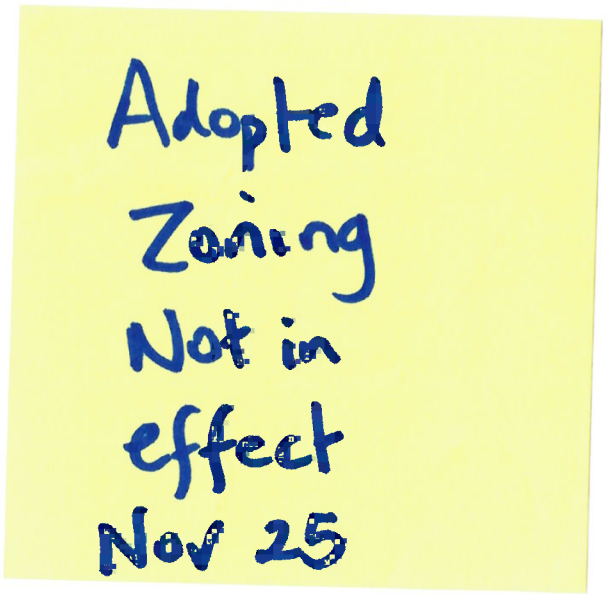
1.5.D Application of "additional provision"

Sligo County Council has long acknowledged the fact that the majority of sites zoned for housing are not being developed during the life of the development plan .The "land hoarding" phenomenon is particularly damaging to the growth of Sligo Town and to its proper functioning as a Regional Growth Centre.

The Guidelines indicate that in the situation where lands are not activated – for any reason – it will be necessary to identify other suitable lands, where the probability of development is hig her.

It is considered opportune to identify up to 50% additional lands suitable for residential use – up to 50 hectares – to ensure compliance with the "additional provision" required by the Guidelines.

To this end, several options have been examined, and a recommendation is included in the next section of this Report.



2 Options considered by the Council

In order to support the Elected Members in deciding on how to comply with the Minister's request (as per the letter dated 30 July 2025), three options were identified and presented to the Members during a workshop on 13 October 2025. The options are summarised below.

Option 1	Option 2 (A and B)	Option 3
Await the issuing of a Final Ministerial Direction before deciding on whether (or not) to carry out a variation of the development plan	Identify sites (up to 50 ha of land) for release (by variation) from the Strategic Land Reserve: (2A) in Sligo Town only OR (2B) in Sligo Town and in the Support Towns of Ballymote, Enniscrone, Tobercurry	Amend (by variation) the Development Plan's policies relating to the Strategic Land Reserve, to facilitate housing development where it can be demonstrated that lands are adequately serviced

2.1 Option 1 – Await Final Direction

Given that the adopted zoning (residential and mixed uses including residential) of circa 55 ha of land has been made ineffective by the Draft Direction, there is no certainty regarding the final amount of land zoned for housing in the CDP.

This option involves holding off until the issuing of a Final Ministerial Direction would provide the necessary basis for assessing the housing potential of lands zoned for residential and mixed uses. Should this potential be lower than the requirements of the HGR Guidelines, (i.e. including an additional provision of up to 50%), a Development Plan variation would be necessary.

If a variation is demonstrably necessary, the next step would be to choose between Option 2 and Option 3.

Pros and cons

Positive consequences (potential) – holding off until the Minister makes a decision regarding the contents of the Direction may, in fact, hasten/trigger the issuing of the Final Direction. This would provide the evidence basis for decision-making regarding the opportunity and scope of a Development Plan variation.

Negative consequences – an excessive waiting period would obviously delay the implementation of the policies and objectives of the Housing Growth Requirements Guidelines. This would not be appropriate, given the urgency expressed in the Minister's letter (dated 30 July 2025) – *"there is now an urgent need for development plans to be updated to reflect the requirements of the recently approved Revised NPF in respect of housing"*.

2.2 Option 2 – Release lands from the Strategic Land Reserve

This option involves the examination of lands included in the Strategic Land Reserve. The purpose is to identify those sites which would be the most appropriate – in terms of infrastructure and location – for residential/mixed use. The sites would then be zoned accordingly through a Development Plan variation procedure.

The selection of sites – up to 50 hectares in total (refer to page 12 for calculations) – would be carried out based on the Infrastructure Assessment and Settlement Capacity Audits already published as part of the adopted CDP (with minor updates or corrections, where applicable).

Two sub-options have been considered:

2A focus on Sligo Town, selecting up to 50 hectares from SLR sites

2B select sites up to 50 hectares from SLR sites in Sligo Town and in the Support Towns (Ballymote, Enniscrone, Tobercurry)

Pros and cons

Positive consequences – this option (both sub-options) is consistent with the 'additionality' of *"up to 50% over and above the housing growth requirement for each local authority"* specified in the Policy and Objective 2 of the HGR Guidelines. It also involves the selection of the most suitable sites, based on clear criteria.

Negative consequences – reopening the debate on residential zoning has the potential to generate requests for considering other sites across the County, not necessarily suitable for housing or notpreviously assessed in terms of infrastructure availability. Choosing this option would also lead to a longer time for preparing documents for consultation on the proposed variation.

2.3 Option 3 – Amend the SLR policies to open land for development

In the adopted Plan, the Strategic Land Reserve policies restrict development with only two exceptions: shortage of housing land (due to faster-than-expected house-building or demonstrable constraints to development) and identification of sites for social and affordable housing as part of the Council's Housing Delivery Action Plan (HDAP).

The amendment of the SLR policies would reduce their number and would retain the current restriction while reformulating one of the two exceptions as shown on the next page

Pros and cons

Positive consequences – in principle, this option removes any potential bias or error in deciding which additional lands should prioritised for residential development, as it theoretically opens for development the entire Strategic Land Reserve of the County, which amounts to circa 218 ha.

Where developers can demonstrate (at pre-application consultation stage) that essential infrastructure – such as water supply, wastewater drainage and transport – is already in place or under construction, **any site included in the SLR will be considered suitable – in principle – for residential development.**

Negative consequences (potential) – there are six Compact Growth policies in Chapter 10 of the CDP, the first one relating to sequential development. Residential proposals on SLR sites which are/have become serviced may not be able to demonstrate 100% compliance with all six policies. Planning decisions in favour of residential development may result in the construction of new housing in locations that are not adjoining existing built-up areas – particularly in Sligo Town – at least until infill development takes place. However, given the growing housing deficit, some temporary gaps in the urban fabric might have to be accepted.

Existing SLR policies in Chapter 10 (Urban development principles) of the adopted CDP:

Strategic Land Reserve policies

It is the policy of Sligo County Council to:

P-SLR-1 Restrict development on lands included in the Strategic Land Reserve, which are shown on the Zoning Maps pertaining to the towns and villages plans contained in this CDP.

P-SLR-2 Release lands from the Strategic Land Reserve only in the following exceptional circumstances:

A. The Planning Authority considers that the development of zoned lands is progressing faster than expected and a shortage of residential land may arise during the lifetime of the CDP, as a result of zoned land not coming forward for development due to demonstrable constraints.

B. The lands have been identified for the provision of social and affordable housing as part of the Local Authority Housing Delivery Action Plan.

P-SLR-3 Any land release from the SLR shall be supported by factual evidence demonstrating that the lands proposed to be released are/have become fully serviced and can deliver residential development within the lifetime of the Plan, thus facilitating progress towards the housing targets for the respective settlement.

P-SLR-4 The land release shall be done using the development plan variation procedure.

Proposed amendments to SLR policies:

Strategic Land Reserve policies

It is the policy of Sligo County Council to:

P-SLR-1 Restrict development on lands included in the Strategic Land Reserve, which are shown on the Zoning Maps pertaining to the towns and villages plans contained in this CDP.

P-SLR-2 Exceptions to the above policy will only be considered in the following circumstances:

A. The lands have been identified for the provision of social and affordable housing as part of the Local Authority Housing Delivery Action Plan.

B. There is factual evidence that such lands are/have become fully serviced in terms of water supply, wastewater and transport infrastructure.

Any proposal for residential or mixed-use development (including residential) on such lands must have regard to the **Compact Growth policies** set out in **Section 10.4, Chapter 10** (this chapter) of the Development Plan.

The proposal must also demonstrate capability to deliver residential development within the lifetime of the Plan, thus facilitating progress towards the housing targets for the respective settlement.

The Compact Growth policies (which would remain unchanged in Chapter 10), mentioned in the amended policy P-SLR-2 ,are as follows:

Compact growth policies

It is the policy of Sligo County Council to:

P-CG-1 Ensure that the expansion of towns or villages takes place in accordance with the principle of sequential development, from the settlement core outwards, on infill sites, backland sites and designated Settlement Consolidation Sites.

P-CG-2 In town and village centres, promote high-q uality i nfll and backland development that consolidates and regenerates the existing urban core of the settlement and provides a diverse range of uses.

P-CG-3 Require that backland development is based on masterplans to be prepared in consultation with the Planning Authority. Piecemeal development of backlands within town and villages will be discouraged.

P-CG-4 Seek to create a strong urban edge for every town and village by preventing ribbon development onthe approaches to built- up areas and by restricting unnecessary development within the green belts around the settlement.

P-CG-5 Require new developme nt on or in the vicinity of a settlement's development limit to address the views from the approach roads and present an attractive frontage to these roads.

P-CG-6 Ensure that large areas of gre enfieldzoned land in towns and villages are developed on the basis of masterplans, to be prepared by or in consultation with the Planning Authority, in order to ensure appropriate integration of land-use and transport. Such masterplans shall be subject to public consultation and, where considered appropriate based on the extent of land involved, incorporated into the relevant statutory plan (development plan or local area plan).

2.4 Recommendation: vary the CDP as per Option 3

In light of the elected Members' feedback received during and after the workshop of 13 October 2025, **it is considered that Option 3 should be selected.**

The positive features of Option 3 largely outweigh any potential negative consequences. This Option offers equal opportunities – in principle – to all landowners or developers who have invested into servicing their respective SLR sites. Such sites will be "self-selecting" for residential development, provided that well-prepared planning applications can demonstrate compliance with all the relevant policies and objectives of the County Development Plan.

Theoretically, Option 3 opens circa 218 ha (39 sites in eight settlements, of which 19 sites are in Sligo Town) of SLR lands for residential development. This area is in addition to the 150 ha already zoned in the adopted CDP and not affected by the Draft Ministerial Direction (affected sites reverting to previous SLR zoning are included in the 218 ha).

The 368 ha (218 ha + 150 ha) have a housing capacity of 11,087 units: 4,304 units from RES + MIX zoned lands and 6,783 from SLR lands.

The total area of 368 ha might seem excessive, given that only 172 ha would be necessary for the construction of 6,048 units (new housing target of 4,032 plus 50% additional provision), at an average density of 35 units/ha. But it is highly unlikely that all the RES, MIX and SLR lands would be developed during the remaining life of the CDP (by 2030).

Nevertheless, Option 3 would offer landowners and developers a strong incentive to invest in the infrastructure required to support new housing development. If completed before 2030, such infrastructure will provide a solid basis for full residential and mixed-use zoning in the next Development Plan (which will have a 10-year lifespan).

It is recommended that Sligo County Council vary its Development Plan by amending the Strategic Land Reserve Policies included in Volume 2, Chapter 10 Urban development principles.

The Core Strategy Table (Table 3.2 in Chapter 3 Core Strategy Statement) should be updated and finalised only after the issuing of the Final Ministerial Direction and the completion of the CDP variation procedure.

Summary of potenti al housing capacity of zoned lands

New S. 28 Housing Growth Targets (HGR) allocation for County Sligo (over the life of the CDP 2024- 203

672 units per year x 6 years = 4,032 units

150% of 4,032 units = 6,048 units (additional provision of 50% included)

Housing capacity of lands zoned RES, MIX and SLR:

between 11,087 units and 11,568 units

Housing potential of lands zoned in the adopted CDP (before the Draft Direction)

RES and MIX zoning (only lands with housing potential)	Potential housing yield of RES and MIX zoned lands (dwellings)	Potential housing yield of RES and MIX zoned lands PLUS houses across villages and rural areas	Strategic Land Reserve (SLR) (only lands with housi ng potential)	Potential housing yield of the SLR (dwellings)	TOTAL potential housing yield of RES, MIX and SLR lands (dwellings)
205 ha	6,025 units (149.4 % of HGR Guidelines allocation)	6,025 + 580* = 6,605 (163.81% of HGR Guidelines allocation)	181.01 ha	5,543 units	11,568 units (285.4 % of HGR Guidelines allocation)

* It is assumed that circa 580 units will be built in small villages and rural areas over the life of the CDP 2024-2030

Shortfall before the Draft Direction: 6048 units minus **6025 units = 23 units**

(equivalent to 0.65 hectares considering an average resid ential density of 35 units/ha)

Housing potential of zoned lands based on their effective zoning (after the Draft Direction)

["effective zoning" is detailed in Section 1.4 of this Report]

RES and MIX zoning (only lands with housing potential)	Potential housing yield of RES and MIX zoned lands (dwellings)	Potential housingyield of RES and MIX zoned lands PLUS houses across villages and rural areas	Strategic Land Reserve (SLR) (only lands with housing potential)	Potential housing yield of the SLR (dwellings)	TOTAL potential housing yield of RES, MIX and SLR lands (dwellings)
150 ha	4,304 units (106.7 % of HGR Guidelines allocation)	4,304 + 580* = 4,884 (121.13% of HGR Guidelines allocation)	218.18 ha	6,783 units	11,087 units (273.46 % of HGR Guidelines allocation)

* It is assumed that circa 580 units will be built in small villages and rural areas over the life of the CDP 2024-2030

Shortfall after the Draft Direction: 6,048 units minus **4,304 units = 1,744 units**

(equival ent to circa 50 hectares considering an average residential density of 35 units/ha)

3. Next steps towards a Development Plan variation

3.1 Recommended contents of the Proposed Variation

I. In Volume 1, Chapter 3 of the CDP (Core Strategy Statement), **Section 3.1.3 Consistency with national housing supply targets** should be replaced by appropriate wording to reflect the replacement of the Housing Supply Target allocation (2020) with the new Housing Growth Requirements target (2025), as per the S. 28 HGR Guidelines.

II. **Table 5.2 Adjusted total housing demand in Co. Sligo during the Development Plan period** should be deleted from Chapter 5 Settlement Strategy (Vol. 1 of the CDP), because it has become redundant as a consequence of the 2025 HGR Guidelines replacing the S. 28 Housing Supply Target Methodology Guidelines (2020).

III. In line with the recommendation contained in Section 2.4 of this Report, the Development Plan should be varied by amending the **Strategic Land Reserve Policies** included in **CDP Volume 2, Chapter 10 Urban development principles.**

IV. The Proposed Variation should also include the **rezoning of two sites** in accordance with the Planning Authority's determinations on submissions RZLT 25-01 and RZLT 25-02 received in 2025 following public consultation on the Residential Zoned Land Tax (RZLT) draft map[1].

Please refer to Appendix B of this Report, which contains all the four parts of the Proposed Variation in the form that would be published for consultation.

[1] *The Finance Act 2024 introduced provisions for landowners to submit rezoning requests to remove their land from the liability to tax, to allow for the continued economic use of the land. Sligo County Council issued positive determinations on two requests for rezoning from residential use to a use that would reflect the ongoing agricultural use of the lands.*

3.2 Variation procedure in accordance with the PDA 2000

Step One – Confirmation the by the Elected Members

Following consideration of this Chief Executive's Report by the Elected Members at their Ordinary Meeting on 1 December 2025, it is expected that they will confirm their agreement for the contents of the Proposed Variation. After this confirmation, theDevelopment Planni rg Unit will finalise the documentation for a Draft Variation and commence the procedures set out in Section 13 of the Planning and Development Act 2000 (as amended) (PDA).

Step Two - Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA)

Article 13(k)(1) of the Planning and Development Regulations 2001 (as amended) requires the Planning Authority to ascertain that the Proposed Variation will not have significant effects on the environment.

Section 13(13) of the PDA specifies that *"an appropriate assessment of a draft variation of a development plan shall be carried out in accordance with Part XAB"*.

It will be necessary to carry out both Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) screening of the Proposed Variation.

As the CDP has already been subject of full SEA and AA before itsadoption, the proposed changes to SLR policies and the dezoning of two sites would notbe expected to have significant additional effects on the environment.

For the purpose of SEA, where it is NOT determined that the Proposed Variation would be likely to have significant environmental effects, the Planning Authority must notify the prescribed environmental authorities, inviting submissions during a specified period of minimum 4 weeks.

The Planning Authority will then make a determination and publish a copy of its decision ,including the reasons for not requiring a full environmental assessment.

Step Three – Draft Variation: statutory notifications

In accordance with Section 13(2)(a) of the PDA, where the Planning Authority proposes to make a variation of its existing development plan, it must give notice to the Minister for DHLGH, the Minister for Tourism, Culture, Arts, Gaeltacht, Sport and Media the Office of the Planning Regulator, An Coimisiún Pleanála, the Northern and Western Regional Assembly, the planning authorities of adjoining counties, the prescribed autho rités (listed in the Planning Regulations) and the Local Community Development Committee. The same notice must be published in one or more local newspapers.

The notice wil lalso indicate that the Planning Authority's decision on the requirement for environmental assessments (SEA and AA) is available for inspection by the public in hard copy and on the Council's website, together with the Draft Variation.

Any person or organisation will be able to make a submission during a specified period of minimum 4 weeks. S ubmissions will be published on the Council's Consultation Portal within 10 working days of receipt.

Step Four - Chief Executive's Report

Following public consultation, the Chief Executive must prepare a report summarising the issues raised in submissions and give a response to those issues. The Minister or the Office of the Planning Regulator may make recommendations, which must be addressed in the first instance.

Within 8 weeks of the date of the public notice, the Chief Executive's report must be submitted to the Elected Members for consideration during a Council meeting.

Step Five – Consideration by Elected Members

After receiving the Chief Executive's Report, the Elected Members will have six weeks to consider the following:

- the Draft Variation;
- any potential for significant effects on the environment (as per the determination at Step Two);
- the Chief Executive's recommendation on the manner of addressing issues raised in submissions.

At this stage, the Elected Members may pass a resolution to:

- make the variation, with or without further (minor) modifications OR
- refuse to make the variation.

The process ends if the Members decide to make the variation, which becomes effective immediately.

If the Members decide, by resolution, to make material modifications (i.e. propose amendments) to the Draft Variation, these proposed amendments must go on public display for a period of at least four weeks, but only after they are assessed for potential environmental impacts.

Step Six – Proposed Amendments to the Draft Variation

The Proposed Amendments and any accompanying environmental reports must be placed on public display for a period of four weeks (minimum).

The Planning Authority will issue a public notice, inviting the public and prescribed bodies to participate in the final round of consultation. All submissions received during the third public consultation phase will be summarised in a second Chief Executive's Report.

Step Seven – Elected Members make the Variation

After considering the Proposed Amendments and the Chief Executive's recommendations on the issues raised during the second phase of consultation, the Members will finally adopt/make the Variation of the Development Plan, which will become operational from the day it is made.

3.3 Estimated timeframe for making the Variation

After the Elected Members consider this Chief Executive's Report and decide on the contents of the Draft Variation, Sligo County Council must adhere to the statutory process set out in Section 13 of the Planning and Development Act 2000 (as amended) and the procedure outlined in Article 13(K) of the Planning and Development Regulations 2001 (as amended).

The estimated timeframe for the Development Plan Variation process is provided below, assuming that the Elected Members make their decision during the ordinary Council meeting on 1st December 2025. Stages that directly involve the Elected Members are indicated in green type.

Development Plan Variation process and estimated timeframe

1. *Members confirm the contents of the Draft Variation, after consideration of the Chief Executive's Report on the application of S.28 HGR Guidelines – 1 December 2025*
2. *Preparation of Draft Variation and associated environmental reports (SEA and AA screening) for consultation with prescribed environmental authorities – by 19 December 2025*
3. *Environmental authorities are given 4 weeks to respond to consultation – from 19 December to 30 January (9 days over the Christmas period are disregarded, as specified in the Planning and Development Act 2000, as amended)*
4. *Based on the above consultation, the Planning Authority makes the SEA and AA Determinations for publication alongside the Draft Variation – by 6 February 2026*
5. *Give notice of publication of the Draft Variation to the public and the prescribed bodies – during the week of 9-13 February 2026*
6. *Draft Variation on public display for 4 weeks – 13 February to 13 March 2026*
7. *Chief Executive's Report on submissions submitted to Members – by 10 April 2026*
8. Members may wish to modify the Draft Variation or **accept the Manager's recommendations and make the Variation without further modifications – on 11 May 2026** (ordinary Council meeting). **In this case, the Variation comes into effect on the same day.**
9. If the proposed modifications are a material alteration of the Draft Variation, publish notice within two weeks of Members' decision, i.e. by 22 May 2026, specifying the additional time required for carrying out SEA and AA of the proposed material alteration
10. Put the proposed amendments on public display and invite submissions (minimum four weeks) – possibly from 12 June to 10 July 2026
11. Chief Executive's Report on submissions and observations submitted to Members by 7 August 2026
12. Members make the Plan with or without the proposed amendments on 7 September 2026
13. The Variation comes into effect on the day it is made, i.e. 7 September 2026

SLIGO COUNTY COUNCIL

RESOLUTION

Item on Agenda: 16

Meeting date: 1st December, 2025

PROPOSED BY: Cllr. J. Queenan

SECONDED BY: Cllr. F. Nealon

AND RESOLVED:

Having considered the **Chief Executive's Report** prepared on foot of the Section 28 Guidelines for Planning Authorities entitled 'NPF Implementation: Housing Growth Requirements', it is hereby agreed to commence the process of making a **Variation** to the Sligo County Development Plan 2024 – 2030 in accordance with the recommendation contained in the Chief Executive's Report.

At the meeting of the Council held this 1st day of December 2025

the above Resolution was AGREED / CARRIED / LOST

SIGNATURE OF CATHAOIRLEACH:

Huge Concern for Habitat

Alerting Authorities in 2016

Killaspugbrone looped trail - attached

Gmail

Ann McKirdy <annmckirdy@gmail.com>

Very Important : Transcript of Special Area of Conservation, Killaspugbrone, Co[illegible]ty Council

3 messages

Ann McKirdy <annmckirdy@gmail.com> Wed, May 11, 2016 at 6:11 PM
To: mcarty@sligococo.ie, jboydell@sportireland.ie

Sligo County Council signpost transcript Killaspugbrone.docx
42K

Ann McKirdy <annmckirdy@gmail.com> Thu, May 12, 2016 at 1:28 PM
To: cgonley@sligoleader.com, Sligo Walks <dkennedy@sligoleader.com>, sineadmaguire@yahoo.com, dbree@eircom.net

Please find attached a very important transcript of the sign erected by the Sligo County Council at the Killaspugbrone Special Area of Conservation site, Killaspugbrone, Strandhill.

--------- Forwarded message ---------
From: **Ann McKirdy** <annmckirdy@gmail.com>
Date: Wed, May 11, 2016 at 6:11 PM
Subject: Very Important : Transcript of Special Area of Conservation, Killaspugbrone, County Council
To: mcarty@sligococo.ie, jboydell@sportireland.ie

Sligo County Council signpost transcript Killaspugbrone.docx
42K

Ann McKirdy <annmckirdy@gmail.com> Sat, Jan 8, 2022 at 2:11 PM
To: Aine Nic Amhlaidh <Ainenicamhlaidh@gmail.com>

[Quoted text hidden]

Sligo County Council signpost transcript Killaspugbrone.docx
42K

Raised Concern Immediately May 2016 upon seeing sign 'Lub Naisiúnta'

Sligo County Council, Public Information Sign

The sand dunes in the vicinity of this sign are a very special place for our natural heritage. Accordingly the area is included in the Cummeen Srand/Drumcliff Bay Special Area of Conservation (SAC) as designated under the EU Habitats Directive. Member states are required by law to protect the habitats and species found here so that future generations may also enjoy this aspect of our wildlife heritage.

A particularly interesting area is to be found just outside of the fence of the Sewage Treatment plant and we request that you avoid walking in this area unless you are specifically going to view the flora.

There are over 90 species of wild plant recorded from his small area of sand dunes. Some of the grass-like plants are vitally important in binding the sand and stabilising the dunes such as:

Red fescue
Marram Grass
Sand sedge

Others are specialists of lime rich habitats such as dunes that contain shell sand:

Kidney vetch
Bird's foot trefoil
Lady's bedstraw
Wild thyme

And some less common flowers found here:

Autumn gentian
Field gentian
Yellow wort
Hairy rock-cress
Common broomrape

Of great beauty and often with a degree of rarity are the orchids and this area has quite a selection of species including

Pyramidal orchid
March heleborine
Broad leaved marsh orchid
Bee orchid

The hollows between the sand hills are often damp where the water table comes near to the ground surface and here we can find

Meadow thistle
Adder's tongue (an unusual fern)

There are also several animals of sand dune habitat found here that are uncommon or rare. These include moths, butterflies a bumblebee (Bombus magnus) and a variety of different snails including the very rare Vertigo angustior. This tiny snail is common here, but in Europe it is a great rarity and is specifically protected under the EU Habitats Directive. Birds

of the area include the meadow pipit, skylark and stonechat. From dusk onwards there is a chance of seeing a badger in these dunes and long-eared owl is known from the vicinity.

Please help protect this site by taking pleasure from what you see and becoming informed about your heritage. Enjoy looking at the wildflowers but refrain from picking them. If you are just passing through the area, keep to the paths to avoid trampling the flowers.

Do not light fires in the dunes.

This sign was erected by Sligo County Council with advice from :
Dr. Don Cotton, Senior Lecturer, IT, Sligo
Tom Roderick, Conservation Ranger, National Parks and Wildlife Service
Siobhan Ryan, Heritage Officer, Sligo County Council.
****

I have also included a link below to the *'Action Plan for Dune and Machair Birds in Ireland, 2011-2020.'* This is a very significant document as it outlines the responsibility to protect threatened species. The Killaspugbrone SAC habitat is home to the following DUNE NESTING BIRDS; tern, the stonechat, the skylark, the common gull. It is imperative that we protect the dunes from accidental destruction by walkers.

www.birdwatchireland.ie/LinkClick.aspx?fileticket=Ep01XTcsaqk%3D&tabid=946



'The stone chat is a small little bird often seen perched on a post You will often see it flicking its wings and tail and calling with short 'chipping' notes and sounds like a few small stones shaken together in your fist. That is why it is called a stonechat because of the sound it makes. In summer the male is brightly coloured with its orange breast, black head and white front. The female, young and winter male are rather dull-coloured versions of the summer colours.

It can be seen in rough ground and scrubland and along the coast. Its favourite place to build a nest is in a gorse bush. Gorse looks and smells lovely springtime. It used to be more widespread but because of the large number of farmers and sprays, it had to leave farmland.'

'The Skylark builds its nest on the ground within tall vegetation to hide from predators. They can be seen, or more often heard, singing above these habitats.'

.

Action Plan for Dune and Machair Birds in Ireland, 2011-2020
re: Legislation to Protect Endangered Species;

"Irish and European legislation also provides for the protection of sites of special conservation interest for particular species and habitats. Site designation is amongst the strongest forms of protection for threatened species. The European Birds and Habitats Directives are particularly relevant as they provide the means to designate important international areas of conservation concern for priority bird species, through Special Protection Areas (SPAs) and biodiversity and habitats, through Special Areas of Conservation (SACs)[…]The requirement to protect habitats for bird outside of designated sites through national policy and local government policy and decision-making is also a requirement of the Habitats and Birds Directives.

Quote from: 1.2 Why Ireland's birds need action now, **'Action Plan for Dune and Machair Birds in Ireland, 2011-2020.'**

A review of Ireland's birds was conducted by Lynas et al.3in 2007; it found that many of our birds have undergone huge population and range declines, 90% or more for some species. Sadly, one species (the Corn Bunting) has become extinct in this country since the previous assessment of the conservation status of birds in Ireland in 1999. There are currently more species on the Red and Amber Birds of Conservation Concern in Ireland (BoCCI) list than ever before. Ireland also has responsibilities for a number of bird species of European and global importance that are experiencing international declines (see

Table 2 for more information on the conservation status of the species in this group). ****THE SLYLARK IN KILLASPUGBRONE SAC IS LISTED IN TABLE 2, Amber Bird Conservation.***

The Birds Directive (2009/147/EC) and Habitats Directive (92/43/EEC) provide the framework for the protection of Europe's wildlife and are transposed through regulations, most recently the European Communities (Birds and Natural Habitats) Regulations 2011. These regulations are mainly implemented in Ireland through the Wildlife Act 1976 and Wildlife (amendment) Act 2000.

Fulfilling our obligations under these Directives is vital to protect biodiversity, ecosystems and the services they provide us.'

We have a collective responsibility to ensure that this delicate Special Area of Conservation is protected.

I will close with a poem by Seamus O'Sullivan, written in Sligo, 'The Starling Lake,'. It is an evocative reminder of our responsibility to future generations that they may experience the sights and sounds we as custodians have preserved for their enjoyment.

My sorrow that I am not by the little dún

By the lake of the starlings at Rosses under the hill,

And the larks there, singing over the fields of dew,
Or evening there and the sedges still.
For plain I see now the length of the yellow sand,
And Lissadell far off and its leafy ways,
And the holy mountain whose mighty heart
Gathers into it all the coloured days.
My sorrow that I am not by the little dún
Bu the lake of the starlings at evening when all is still,
And still in whispering sedges the herons stand.
'Tis there I would nestle at rest till the quivering moon
Uprose in the golden quiet over the hill.

I look forward to hearing from you.

Yours sincerely,

Ann McKirdy

June Boydell

Declan Bre

2016 Concern Looped Trail

Gmail

Killaspugbrone, Strandhill, Sligo National looped

8 me ages

Ann McKirdy <annmckirdy@gmail.com>
To: jboydell@sportireland.ir

>
> Cc: June Boydell, National Trails and Walks
>
>
> Dear Michael,
>
>
>
> I am writing to follow up on my query yesterday regarding the Environmental
> Impact Report I had requested to see regarding the development of the
> National Looped Walk in the Special Conservation Area of Killaspugbrone. I
> had requested to view this report as I have seen an alarming degradation of
> this Special Conservation Area due to the increase in walkers since the new
> National Looped Walk has opened. I was very surprised and disappointed to
> learn that no Environmental Impact Report had been undertaken in spite of
> the fact that this area is designated under EU law as a Special Area of
> Conservation.
>
>
>
> According to the County Sligo Development Plan 2011-2017 Natura Impact
> Report 2013 there are specific requirements and obligations on the County
> Council to ensure that no development will take place in these SAC's
> without appropriate assessment.(National Parks and Wildlife Service
> Ballysadare Bay SAC; http://www.npws.ie/protected-sites/sac/000622)
>
>
>
> You had mentioned during our conversation that the County Council did not
> do anything except signpost an existing pathway. The Killaspugbrone
> Preservation Project contradicts this, its report states 'In 2005/2006
> consultations were held with the Sligo County Council to establish which
> paths should be used. Grant aid and Project funds financed the erection of
> finger-posts on the paths and this greatly helped the protection of the
> dunes.' Local resident, Deirdre Foley, who is in her 80's and has lived
> here all her life and whose family is buried in Killaspugbrone says access
> to the church was always by the shore.
>
>
>
> Sligo County Council's mandate is to protect this area, your own report has
> highlighted the necessity for a raised board walk if this area was to be
> further developed for tourism. To re state the importance of this SAC and
> quote from the Council's own report, 'The Department recognises that this
>
> ---- Message truncated ----
>

Mail Delivery Subsystem <mailer-daemon@googlemail.com> Wed, May 11, 2016 at 3:04 PM
To: annmckirdy@gmail.com

Delivery to the following recipient failed permanently:

jboydell@sportireland.ir

Technical details of permanent failure:
DNS Error: 220493353 DNS type 'mx' lookup of sportireland.ir responded with code NXDOMAIN
Domain name not found: sportireland.ir

---- Original message ----

DK Signature: v=1; a=rsa-sha256; c=relaxed/relaxed;
d=gmail.com; s=20120113;
h=content-transfer-encoding:from:mime-version:subject:message-id:date
:to;
bh=wlfEdNIXsdynt53iOZLh/56PqPezfbwbR+LcYN9X9o0=;
b=wM1Vd2+Pf0c/d/dlVo+mAXOoQfWH8BZ+1xzpki5U5xavTTJw2HKTXvRLrAf1qslFwg
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FK2WqikD1EJJp9SXscmJtHcoMVFXdrWHECf1wq7XdR8/hiPNICluUOGZc/dAsZ0orL/4
MAKQ==
X-Google-DKIM-Signature: v=1; a=rsa-sha256; c=relaxed/relaxed;
d=1e100.net; s=20130820;
h=x-gm-message-state:content-transfer-encoding:from:mime-version
:subject:message-id:date:to;
bh=wlfEdNIXsdynt53iOZLh/56PqPezfbwbR+LcYN9X9o0=;
b=SX59pCRSb9hZZ62w2xm2kegR2iqTzMKIEvs/xcBFm8P7sovAcf5wn/869wUsp6eqAL
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oNA+y03Lje5okSxNtV7QNpTv6mDtZ1mrUlHplYHm5xVZYFqPi0+u7iruGYcutx3veBes
oKRw==
X-Gm-Message-State: AOPr4FX/TD/NMZtHjxJii2iEDlVws83QrldvwaQZafoXlYdaL0n+htAlWGWy4S6iL0QE4g==
X-Received: by 10.194.14.130 with SMTP id p2mr4236050wjc.173.1462975457324;
Wed, 11 May 2016 07:04:17 -0700 (PDT)
Return-Path: <annmckirdy@gmail.com>
Received: from [10.72.65.169] ([213.233.150.28])
by smtp.gmail.com with ESMTPSA id a207sm8746435wma.8.2016.05.11.07.04.16
for <jboydell@sportireland.ir>
(version=TLSv1/SSLv3 cipher=OTHER);
Wed, 11 May 2016 07:04:16 -0700 (PDT)
Content-Transfer-Encoding: quoted-printable
Content-Type: text/plain;
charset=utf-8
From: Ann McKirdy <annmckirdy@gmail.com>
Mime-Version: 1.0 (1.0)
Subject: Killaspugbrone, Strandhill, Sligo National looped walk
Message-Id: <E1CB38AF-21A1-43D2-8B10-1EB53AC5DB3B@gmail.com>
Date: Wed, 11 May 2016 15:04:15 +0100
To: jboydell@sportireland.ir
X-Mailer: iPhone Mail (13E238)
[Quoted text hidden]
----- Message truncated -----

Ann McKirdy <annmckirdy@gmail.com> Thu, May 12, 2016 at 1:21 PM
To: dkennedy@sligoleader.com, sineadmaguire@yahoo.com, dbree@eircom.net, cgonley@sligoleader.com, jboydell@sportireland.ie, mcarty@sligococo.ie

cc: Chris Gonley
cc: Sinead Maguire
cc: Declan Bree
cc: Michael Carty
cc: June Boydell

Dear Deirdre,

You may recall that I spoke with you some weeks ago regarding my concern for the extensive damage being done to the Special Area of Conservation (SAC) by walkers on the Killaspugbrone loop. I am forwarding the emails I have sent to Michael Carty, Sligo County Council and June Boydell, Irish Trails regarding my concerns for the Special Area of Conservation in Strandhill, since this has been included in the Lúb Náisiúnta.

I was very surprised to learn that there was no environmental impact report undertaken prior to opening this National Loop on a European Union designated SAC protected site. This area has a special designation under EU law, the Sligo County Council (on behalf of the Irish Government) have an obligation to protect this area.

I apologise for omitting to send this to you yesterday. I will forward all emails pertaining to this that I have sent to Michael Carty and June Boydell.

I a. .ıot opposed to tourism, I believe it is a wonderful boost to the local economy, and to Sligo in general. The area I am concerned about is of national importance as a heritage site (Killaspugbrone Church dates back to the 5th Century) and a Special Area of Conservation.

It is important to note the history of unstable sand and the damage unstable sand caused in the past. Maaram grass was planted in the 19th Century to stabilise shifting sands blowing over the original settlement. At that time the thatch cottages were inundated by sand causing the roofs to cave in. The inhabitants were forced to move to the slopes of Knocknarea.

Marram grass can stabilise up to 40 meters of sand, it was planted for this purpose in Strandhill over 100 years ago. It has also been used extensively in the Netherlands to reclaim land from the sea. It is essential that we maintain this grass to stabilise our protected dune systems. The grasses are also home to the dune nesting birds, specifically the sky lark and the tern which are on the EU Amber List for protected species.

We are custodians of this beautiful place, it is our responsibility to ensure this Special Area of Conservation is protected. There should be a raised board walk to keep walkers from destroying this delicate ecosystem.

I look forward to your response.
Sincerely,
Ann McKirdy

-------- Forwarded message --------
From: **Ann McKirdy** <annmckirdy@gmail.com>
Date: Wed, May 11, 2016 at 3:04 PM
Subject: Killaspugbrone, Strandhill, Sligo National looped walk
[Quoted text hidden]

Ann McKirdy <annmckirdy@gmail.com> Thu, May 12, 2016 at 1:22 PM
To: jboydell@sportireland.ie

-------- Forwarded message --------
From: **Ann McKirdy** <annmckirdy@gmail.com>
Date: Wed, May 11, 2016 at 3:04 PM
Subject: Killaspugbrone, Strandhill, Sligo National looped walk
To: jboydell@sportireland.ir

>
[Quoted text hidden]

Michael Carty <mcarty@sligococo.ie> Fri, May 13, 2016 at 2:45 PM
To: Ann McKirdy <annmckirdy@gmail.com>, "dkennedy@sligoleader.com" <dkennedy@sligoleader.com>, "Cllr. Sinead Maguire" <sineadmaguire@yahoo.com>, Cllr Declan Bree <dbree@eircom.net>, "cgonley@sligoleader.com" <cgonley@sligoleader.com>, "jboydell@sportireland.ie" <jboydell@sportireland.ie>
Cc: Deirdre Kennedy <dkennedy@sligoleader.com>

Dear Ms. McKirdy,

Thank you for your mail.

I wish to apologise, clarify and correct any confusion which may have arisen during our telephone conversation. An Appropriate Assessment (AA) screening report was carried out ,as required under the Habitat's Directive was for the Killaspugbrone Loop walk. It is available in hardcopy at the Sligo County Council offices, City Hall for review upon request.

I welcome your concept idea of a raised boardwalk, and will investigate potential funding opportunities in this regard.

Yours,

Michael Carty

Michael Carty

Senior Executive Engineer

Sligo County Council

City Hall

Quay St.

Sligo

mcarty@sligococo.ie

tel. (w) 0719114403

Sligo

Sets your spirit free

[Quoted text hidden]

Please help our environment by not printing this email This message is intended only for the use of the person(s) ("the intended recipient(s)") to whom it is addressed. It may contain information which is privileged and confidential within the meaning of applicable law. If you are not the intended recipient, please contact the sender as soon as possible. The views expressed in this communication may not necessarily be the views held by Sligo County Council. Any attachments have been checked by a virus scanner and appear to be clean. Please ensure that you also scan all messages as Sligo County Council does not accept any liability for contamination or damage to your systems.

SÉANADH: Is d'úsáid an duine/na ndaoine chuig a bhfuil sí seolta agus sin amháin atá an teachtaireacht seo. D'fhéadfadh go bhfuil faisnéis faoi phribhléid nó faoi rún de réir bhrí an dlí is infheidhme inti. Mura tusa an seolaí a bhí beartaithe, bí ar an eolas go bhfuair tú an ríomhphost seo in earráide agus go bhfuil cosc iomlán ar an ríomhphost seo, nó aon chuid de, a úsáid, a scaipeadh, a chur ar aghaidh nó a chóipeáil. Má fuair tú an ríomhphost seo de bharr earráide, téigh i dteagmháil leis an seoltóir chomh luath agus is féidir, le do thoil. Ní gá gurb ionann dearcaí na ríomhphosta seo agus dearcaí Chomhairle Chondae Sligeach. Tá aon iatáin seiceáilte ag scanóir víris agus dealraíonn sé go bhfuil siad glan. Bí cinnte go ndéanfaidh tusa scanáil ar gach

teachtaireacht chomh maith, le do thoil, mar ní ghlacann an Chomhairle dliteanas ar bith i leith éilliú ná dámáiste do do chuid córas.

Ann McKirdy <annmckirdy@gmail.com> Mon, May 8, 2017 at 7:45 PM
To: Declan Bree <dbree@eircom.net>

De Declan,
Thank you for taking my call. I am forwarding the reply I received from Michael Carty last year regarding the possibility of a raised board-walk for the fragile areas of the Killaspugbrone Looped Trail.

The justification I received from the County Council for not carrying out an in depth environmental impact assessments on this Special Area of Conservation was that the County Council simply signposted an existing Looped trail. I know this to be erroneous, there is no record of this and locals will confirm this.

The County Council's mandate is to protect this SAC and this failure to assess the impact of increased usage is causing a rapid erosion of the dune system. The tramping on Marram Grass kills the grass and the delicate web of roots which binds sand.

I understand from our conversation that the only way to address this issue is through judicial review. However, I believe we are all partners in environmental conservation and would hope that the County Council would actively seek funding for a raised boardwalk through the sensitive dune areas of this Looped trail and honour their conservation mandate.

I believe not only would this preserve this delicate and unique ecosystem, it would facilitate improved access for mobility impaired users and consequently increase visitors to the area and improve Strandhill's profile as a tourist destination.

I'd like to thank you for your dedication to the Strandhill Community and especially thank you for your work on the Maratime Center.
Kind regards,
Ann
[Quoted text hidden]

Ann McKirdy <annmckirdy@gmail.com> Sat, Jan 8, 2022 at 2:00 PM
To: Aine Nic Amhlaidh <Ainenicamhlaidh@gmail.com>

[Quoted text hidden]

Ann McKirdy <annmckirdy@gmail.com> Sat, Jan 8, 2022 at 2:24 PM
To: Aine Nic Amhlaidh <Ainenicamhlaidh@gmail.com>

---------- Forwarded message ---------
From: **Ann McKirdy** <annmckirdy@gmail.com>
Date: Wed, May 11, 2016 at 3:04 PM
Subject: Killaspugbrone, Strandhill, Sligo National looped walk
To: <jboydell@sportireland.ir>

>
[Quoted text hidden]

SCREENING
FOR
APPROPRIATE ASSESSMENT REPORT

FOR THE

SLIGO LOCAL ECONOMIC AND COMMUNITY PLAN 2023-2030
IN ACCORDANCE WITH THE REQUIREMENTS OF
ARTICLE 6(3) OF THE EU HABITATS DIRECTIVE

0.15 hectares net gain

1 acre in Strandhill

1 hectare = 2.47 acres

2024-30

for: **Sligo County Council**

County Hall
Riverside
Sligo
County Sligo

Sligo Co. Co.
AA Screening
2023-2030

by: **CAAS Ltd.**

1st Floor
24-26 Ormond Quay Upper
Dublin 7

Folio
28151F

MARCH 2023

Conclusion pg 40
A stage 2 is not required

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Appendix I Background information on European Sites

Section 1 Introduction

1.1 Background

This Appropriate Assessment (AA) Screening Report (also known as *Stage One* AA) has been prepared to assess whether or not a Natura Impact Statement (NIS) (also known as *Stage Two* AA) is required for the Sligo Local Economic and Community Plan 2023-2030 to be adopted ("the Plan"). AA is a procedure carried out in accordance with the requirements of Article 6(3) of Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (as amended) (hereafter referred to as the "Habitats Directive").

1.2 Legislative Context

The Habitats Directive provides legal protection for habitats and species of European importance. The overall aim of the Habitats Directive is to maintain or restore the "favourable conservation status" of habitats and species of European Community Interest. These habitats and species are listed in the Habitats and Birds Directives (Council Directive 2009/147/EC on the conservation of wild birds) with Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) designated to afford protection to the most vulnerable of them. These two designations are collectively known as European sites and Natura 2000.

AA is required by the Habitats Directive, as transposed into Irish legislation by the European Communities (Birds and Natural Habitats) Regulations 2011 (as amended) and the Planning and Development Act (as amended). AA is an assessment of the potential for adverse or negative effects of a plan or project, in combination with other plans or projects, on the conservation objectives of a European site. These sites consist of SACs and SPAs and provide for the protection and long-term survival of Europe's most valuable and threatened species and habitats.

1.3 Approach

The AA process is based on best scientific knowledge and has utilised ecological and hydrological expertise. In addition, a detailed online review of published scientific literature and 'grey' literature was conducted. This included a detailed review of the National Parks and Wildlife (NPWS) website including mapping and available reports for relevant sites and in particular sensitive qualifying interests/special conservation interests described and their conservation objectives.

The ecological desktop study completed for the AA screening of the Plan comprised the following elements:

- Identification of European sites within 15km[1] of the County boundary with identification of potential pathways links for specific sites (if relevant) greater than 15km from the County boundary;
- Review of the NPWS site synopsis and conservation objectives for European sites with identification of potential pathways from the County; and
- Examination of available information on protected species.

There are four main stages in the AA process as follow:

Stage One: Screening
The process that identifies the likely impacts upon a European site of a project or plan, either alone or in combination with other projects or plans and considers whether these impacts are likely to be significant.

[1] Beyond 15km landscape scale ecological interactions are likely to minimise potential effects unless significant hydrological pathways are present.

Stage Two: Appropriate Assessment
The consideration of the impact on the integrity of the European site of the project or plan, either alone or in combination with other projects or plans, with respect to the site's structure and function and its conservation objectives. Additionally, where there are adverse impacts, an assessment of the potential mitigation of those impacts. If adequate mitigation is proposed to ensure no significant adverse impacts on European sites, then the process may end at this stage. However, if the likelihood of significant impacts remains, then the process must proceed to Stage Three.

Stage Three: Assessment of Alternative Solutions
The process that examines alternative ways of achieving the objectives of the project or plan that avoids adverse impacts on the integrity of the European site.

Stage Four: Assessment where no alternative solutions exist and where adverse impacts remain
An assessment of compensatory measures where, in the light of an assessment of imperative reasons of overriding public interest (IROPI), it is deemed that the project or plan should proceed.

The Habitats Directive promotes a hierarchy of avoidance, mitigation and compensatory measures. This approach aims to avoid any impacts on European sites by identifying possible impacts early in the plan-making process and avoiding such impacts. Second, the approach involves the application of mitigation measures, if necessary, during the AA process to the point where no adverse impacts on the site(s) remain. If potential impacts on European sites remain, the approach requires the consideration of alternative solutions. If no alternative solutions are identified and the plan/project is required for imperative reasons of overriding public interest, then compensation measures are required for any remaining adverse effect(s).

The assessment of potential effects on European sites is conducted following a standard source-pathway-receptor[2] model, where, in order for an effect to be established all three elements of this mechanism must be in place. The absence or removal of one of the elements of the model is sufficient to conclude that a potential effect is not of any relevance or significance.

In the interest of this report, receptors are the ecological features that are known to be utilised by the qualifying interests or special conservation interests of a European site. A source is any identifiable element of the Plan that is known to interact with ecological processes. The pathways are any connections or links between the source and the receptor. This report provides information on whether direct, indirect and cumulative adverse effects could arise from the Plan.

The AA Screening exercise has been prepared taking into account legislation including the aforementioned legislation and guidance including the following:

- AA of Plans and Projects in Ireland. Guidance for Planning Authorities, Department of the Environment, Heritage and Local Government, 2009;
- "Commission Notice: Managing Natura 2000 sites - The provisions of Article 6 of the 'Habitats' Directive 92/43/EEC", European Commission 2018;
- "Assessment of plans and projects significantly affecting Natura 2000 sites: Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC", European Commission Environment DG, 2002; and
- "Managing Natura 2000 sites: The Provisions of Article 6 of the Habitats Directive 92/43/EEC", European Commission, 2000.
- Practice Note PN01: Appropriate Assessment Screening for Development Management, Office of the Planning Regulator, 2021.

[2] Source(s) – e.g. pollutant run-off from proposed works; Pathway(s) – e.g. groundwater connecting to nearby qualifying wetland habitats; and Receptor(s) – qualifying aquatic habitats and species of European Sites.

Section 2 Description of the Plan

The Sligo 2030 One Voice, One Vision Strategic Framework (the Sligo 2030 Plan), is Sligo's new Local Economic and Community Plan (LECP). The Plan fulfils the requirements of the Local Economic and Community Plan as set out in the Local Government Reform Act 2014. In combination with the existing planning framework, the Plan will guide the sustainable economic and community development of the County to 2030; however, it is not binding on Sligo County Council when undertaking its functions with respect to whether or not to grant development consent for a project. The development of LECPs is a requirement for all Local Authorities to assist in guiding the development of their respective counties.

The LECP includes goals and objectives related to economic elements such as actions to promote job creation and support existing businesses, and community elements including actions to support inclusion, access to services and addressing disadvantage amongst other areas.

The Plan's overall vision is as follows:

> "The Vision is for a smart, sustainable, and socially inclusive Sligo; one that cherishes its vibrant communities, protects and celebrates its unique environment and rich culture, and is a champion of innovative growth and development."

While Sligo County Council will oversee its overall implementation, the Sligo 2030 Plan will be a shared Plan with vital roles to be played by the private sector, education providers and the wider community to ensure its success. This will include the private sector's contribution to job creation and innovation; education and training providers' role in developing a skilled talent base; the community's participation in developing an inclusive and sustainable county, and the various state and semi-state bodies that will contribute to the overall wellbeing of Sligo through the provision of adequate services and supports for the community and business.

Sligo 2030 One Voice One Vision has been prepared by Sligo County Council in conjunction with the Sligo Strategic Policy Committee (SPC) for Planning, Community & Economic Development, Arts & Culture, the Local Community Development Committee (LCDC), and Sligo Economic Forum (SEF), and has included extensive and thorough consultation with the wider community, private sector, education providers, government agencies and other key stakeholders. The Regional Assembly (NWRA) has been Consulted to ensure consistency and alignment with the Regional Spatial and Economic Strategy and the Municipal Districts have been consulted for input and consistency in relation to the economic and community elements of the plan and with the existing County Development Plan.

As detailed in the introductory section of the Plan:

> "Implementing the Sligo 2030 Plan will involve Sligo County Council helping to facilitate, promote, support and coordinate stakeholders in their activities in a way that is consistent with existing and emerging plans setting out public policy for sustainable development, including that relating to the economy, communities, infrastructure, land use tourism and environmental protection and environmental management.
>
> This Plan is situated alongside this hierarchy of statutory documents that has been subject to environmental assessment/screening for environmental assessment, as appropriate, and forms the decision-making and consent-granting framework. The Plan does not provide consent, establish a framework for granting consent or contribute towards a framework for granting consent; the Plan is not binding on Sligo County Council when undertaking its functions with respect to whether or not to grant development consent for a project.
>
> The Plan fully aligns with the provisions of the existing National Planning Framework, Ireland 2040, National Climate Action Plan 2023, Housing For All 2021, the Regional Spatial and Economic Strategy 2020-2032 and the current County Development Plan, all of which have been subject to legislative requirements relating to public consultation and environmental assessment/screening for environmental assessment. As such, the Plan is wholly subject to the requirements of the provisions set out in these documents (and any subsequent revisions to these documents), including provisions relating to sustainable development, environmental

protection and environmental management that have been integrated into these documents, including through SEA and AA processes, and does not introduce any alterations or additions to those provisions.

In order to be realised, projects included in the Plan (in a similar way to other projects fr or any other sectors) will have to comply, as relevant, with various legislation, policies, plans and programmes (including requirements for lower-tier Appropriate Assessment, Environmental Impact Assessment and other licensing requirements as appropriate) that form the statutory decision-making and consent-granting framework, of which the Plan is not part and does not contribute towards".

Section 3 Screening for Appropriate Assessment

3.1 Introduction to Screening

This stage of the process identifies any potential significant affects to European sites from a project or plan, either alone or in combination with other projects or plans.

An important element of the AA process is the identification of the "'conservation objectives", "Qualifying Interests" (QIs) and/ or "Special Conservation Interests" (SCIs) of European Sites requiring assessment.

QIs are the habitat features and species listed in Annexes I and II of the Habitats Directive for which each European Site has been designated and afforded protection.

SCIs are wetland habitats and bird species listed within Annexes I and II of the Birds Directive. It is also vital that the threats to the ecological / environmental conditions that are required to support QIs and SCIs are considered as part of the assessment.

The following NPWS Generic Conservation Objectives have been considered in the screening:

- For SACs, to maintain or restore the favourable conservation condition of the Annex I habitat(s) and/or the Annex II species for which the SAC has been selected; and
- For SPAs, to maintain or restore the favourable conservation condition of the bird species listed as Special Conservation Interests for this SPA.

Where available, Site-Specific Conservation Objectives (SSCOs) designed to define favourable conservation status for a particular habitat[3] or species[4] at that site have been considered.

3.2 Identification of Relevant European Sites

The Department of the Environment (2009) Guidance on AA recommends a 15 km buffer zone to be considered. A review of the characteristics of the Plan has identified that, in the absence of significant hydrological links, the characteristics of the Plan will not impose effects beyond the 15 km buffer. Beyond this distance potential effects are diminished due to landscape scale ecological interactions. All European sites within a 15km radius of the Plan area were examined to assess potential connectivity corridors on a landscape scale and assess potential interactions between the Plan and the conservation objectives of each of the sites.

Details of European sites that occur within 15 km of the County are listed on Table 3.1. European Sites and the EPA Rivers and Catchments are also mapped on Figure 3.1. Details of European Sites that occur outside the 15 km buffer zone of the County, but which are downstream are also provided in Table 3.1, and mapped on Figure 3.2. Information on QIs, SCIs and site-specific vulnerabilities and sensitivities (see Appendix I) and background information (such as that within Ireland's Article 17 and Article 12 Reports to the European Commission, site synopses and Natura 2000 standard data forms) has been considered.

[3] Favourable conservation status of a habitat is achieved when: its natural range, and area it covers within that range, are stable or increasing; the specific structure and functions which are necessary for its long-term maintenance exist and are likely to continue to exist for the foreseeable future; and the conservation status of its typical species is favourable.

[4] The favourable conservation status of a species is achieved when: population dynamics data on the species concerned indicate that it is maintaining itself on a long-term basis as a viable component of its natural habitats; the natural range of the species is neither being reduced nor is likely to be reduced for the foreseeable future; and there is, and will probably continue to be, a sufficiently large habitat to maintain its populations on a long-term basis.

Conservation objectives that have been considered by the assessment are included in the following National Parks and Wildlife Service (NPWS) documents:

NPWS (2015) Conservation Objectives for St. John's Point SAC [IE0000191] Version 1.
NPWS (2022) Conservation Objectives for River Shannon Callows SAC [IE0000216] Version 1.
NPWS (2021) Conservation Objectives for Lough Melvin SAC [IE0000428] Version 1.
NPWS (2016) Conservation Objectives for Lough Ree SAC [IE0000440] Version 1.
NPWS (2012) Conservation Objectives for Killala Bay/Moy Estuary SAC [IE0000458] Version 1.
NPWS (2020) Conservation Objectives for Doocastle Turlough SAC [IE0000492] Version 1.
NPWS (2016) Conservation Objectives for Flughany Bog SAC [IE0000497] Version 1.
NPWS (2016) Conservation Objectives for Lackan Saltmarsh and Kilcummin Head SAC [IE0000516] Version 1.
NPWS (2016) Conservation Objectives for Cuilcagh - Anierin Uplands SAC [IE0000584] Version 1.
NPWS (2015) Conservation Objectives for Bellanagare Bog SAC [IE0000592] Version 1.
NPWS (2016) Conservation Objectives for Callow Bog SAC [IE0000595] Version 1.
NPWS (2015) Conservation Objectives for Derrinea Bog SAC [IE0000604] Version 1.
NPWS (2016) Conservation Objectives for Cloonshanville Bog SAC [IE0000614] Version 1.
NPWS (2013) Conservation Objectives for Ballysadare Bay SAC [IE0000622] Version 1.
NPWS (2021) Conservation Objectives for Ben Bulben, Gleniff and Glenade Complex SAC [IE0000623] Version 1.
NPWS (2015) Conservation Objectives for Bunduff Lough and Machair/Trawalua/Mullaghmore SAC [IE0000625] Version 1.
NPWS (2013) Conservation Objectives for Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC [IE0000627] Version 1.
NPWS (2017) Conservation Objectives for Lough Hoe Bog SAC [IE0000633] Version 1.
NPWS (2019) Conservation Objectives for Lough Nabrickkeagh Bog SAC [IE0000634] Version 1.
NPWS (2021) Conservation Objectives for Templehouse and Cloonacleigha Loughs SAC [IE0000636] Version 1.
NPWS (2021) Conservation Objectives for Turloughmore (Sligo) SAC [IE0000637] Version 1.
NPWS (2021) Conservation Objectives for Union Wood SAC [IE0000638] Version 1.
NPWS (2016) Conservation Objectives for Arroo Mountain SAC [IE0001403] Version 1.
NPWS (2017) Conservation Objectives for Urlaur Lakes SAC [IE0001571] Version 1.
NPWS (2021) Conservation Objectives for Bricklieve Mountains & Keishcorran SAC [IE0001656] Version 1.
NPWS (2020) Conservation Objectives for Knockalongy and Knockachree Cliffs SAC [IE0001669] Version 1.
NPWS (2021) Conservation Objectives for Lough Arrow SAC [IE0001673] Version 1.
NPWS (2015) Conservation Objectives for Streedagh Point Dunes SAC [IE0001680] Version 1.
NPWS (2016) Conservation Objectives for Lough Forbes Complex SAC [IE0001818] Version 1.
NPWS (2021) Conservation Objectives for Unshin River SAC [IE0001898] Version 1.
NPWS (2019) Conservation Objectives for Cloonakillina Lough SAC [IE0001899] Version 1.
NPWS (2021) Conservation Objectives for Glenade Lough SAC [IE0001919] Version 1.
NPWS (2021) Conservation Objectives for Lough Gill SAC [IE0001976] Version 1.
NPWS (2016) Conservation Objectives for Ox Mountains Bogs SAC [IE0002006] Version 1.
NPWS (2016) Conservation Objectives for Boleybrack Mountain SAC [IE0002032] Version 1.
NPWS (2012) Conservation Objectives for Lower River Shannon SAC [IE0002165] Version 1.
NPWS (2019) Conservation Objectives for Lough Derg, North-East Shore SAC [IE0002241] Version 1.
NPWS (2016) Conservation Objectives for River Moy SAC [IE0002298] Version 1.
NPWS (2021) Conservation Objectives for Dunmuckrum Turloughs SAC [IE0002303] Version 1.
NPWS (2016) Conservation Objectives for Drumalough Bog SAC [IE0002338] Version 1.
NPWS (2015) Conservation Objectives for Tullaghanrock Bog SAC [IE0002354] Version 1.
NPWS (2013) Conservation Objectives for Drumcliff Bay SPA [IE0004013] Version 1.
NPWS (2013) Conservation Objectives for Cummeen Strand SPA [IE0004035] Version 1.
NPWS (2013) Conservation Objectives for Killala Bay/Moy Estuary SPA [IE0004036] Version 1.
NPWS (2022) Generic Conservation Objectives for Lough Gara SPA [IE0004048] Version 9.
NPWS (2022) Generic Conservation Objectives for Lough Arrow SPA [IE0004050] Version 9.
NPWS (2022) Generic Conservation Objectives for Lough Derg (Shannon) SPA [IE0004058] Version 9.
NPWS (2022) Generic Conservation Objectives for Lough Ree SPA [IE0004064] Version 9.
NPWS (2022) Generic Conservation Objectives for Inishmurray SPA [IE0004068] Version 9.
NPWS (2012) Conservation Objectives for River Shannon and River Fergus Estuaries SPA [IE0004077] Version 1.
NPWS (2022) Generic Conservation Objectives for River Little Brosna Callows SPA [IE0004086] Version 9.
NPWS (2022) Generic Conservation Objectives for Middle Shannon Callows SPA [IE0004096] Version 9.
NPWS (2022) Generic Conservation Objectives for Ballykenny-Fisherstown Bog SPA [IE0004101] Version 9.
NPWS (2022) Generic Conservation Objectives for Bellanagare Bog SPA [IE0004105] Version 9.
NPWS (2022) Generic Conservation Objectives for Inishduff SPA [IE0004115] Version 9.
NPWS (2013) Conservation Objectives for Ballysadare Bay SPA [IE0004129] Version 1.
NPWS (2022) Generic Conservation Objectives for Aughris Head SPA [IE0004133] Version 9.
NPWS (2022) Generic Conservation Objectives for Ardboline Island and Horse Island SPA [IE0004135] Version 9.
NPWS (2012) Conservation Objectives for Donegal Bay SPA [IE0004151] Version 1.
NPWS (2022) Generic Conservation Objectives for Sligo/Leitrim Uplands SPA [IE0004187] Version 9.
NPWS (2022) Generic Conservation Objectives for Lough Conn and Lough Cullin SPA [IE0004228] Version 9.
NPWS (2022) Generic Conservation Objectives for Ballintemple and Ballygilgan SPA [IE0004234] Version 9.

The assessment considers available conservation objectives. Since conservation objectives focus on maintaining the favourable conservation condition of the QIs/SCIs of each site, the screening process concentrated on assessing the potential effects of the Plan against the QIs/SCIs of each site. The conservation objectives for each site were consulted throughout the assessment process.

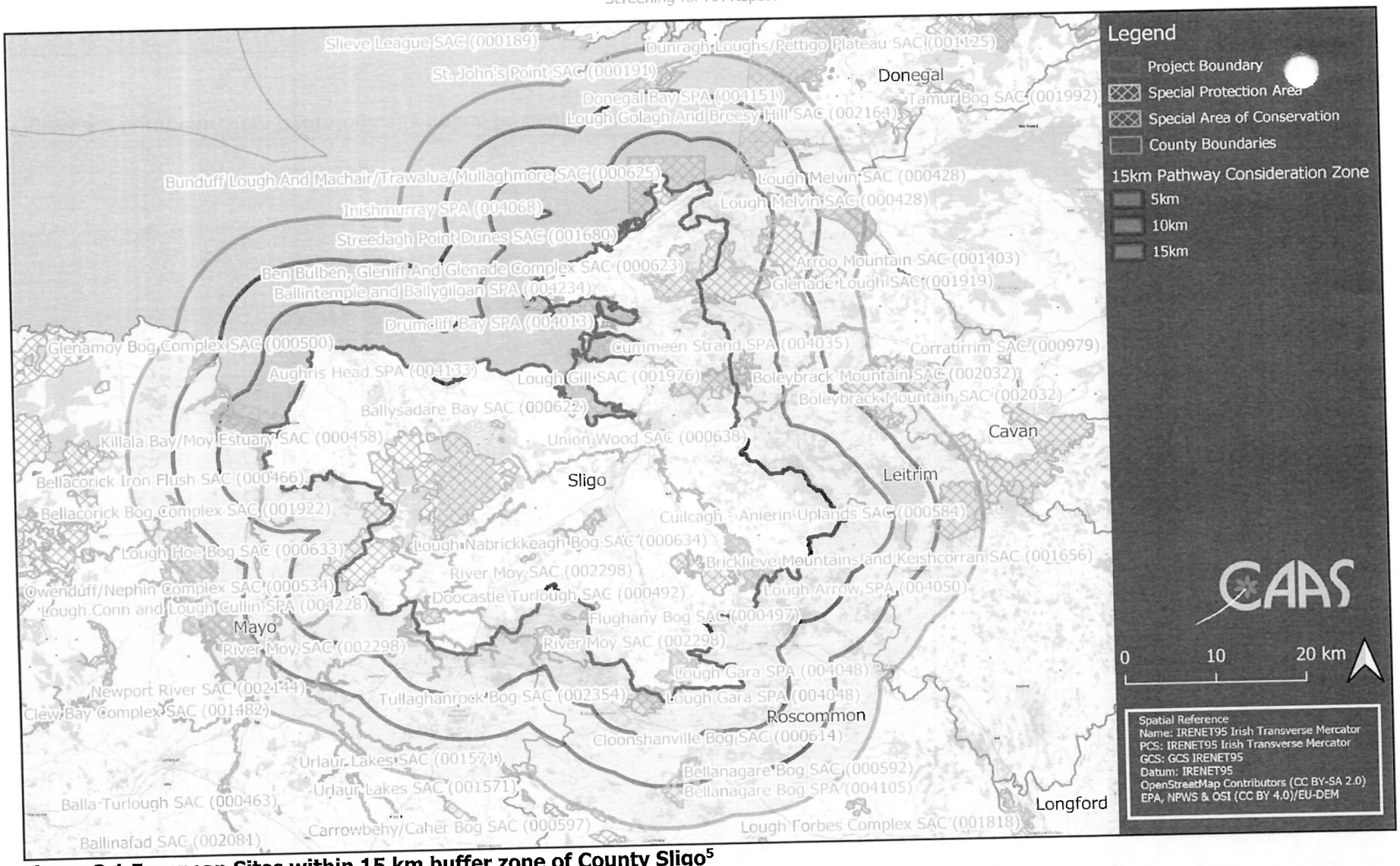


Figure 3.1 European Sites within 15 km buffer zone of County Sligo[5]

[5] Source: NPWS (datasets downloaded January 2023)

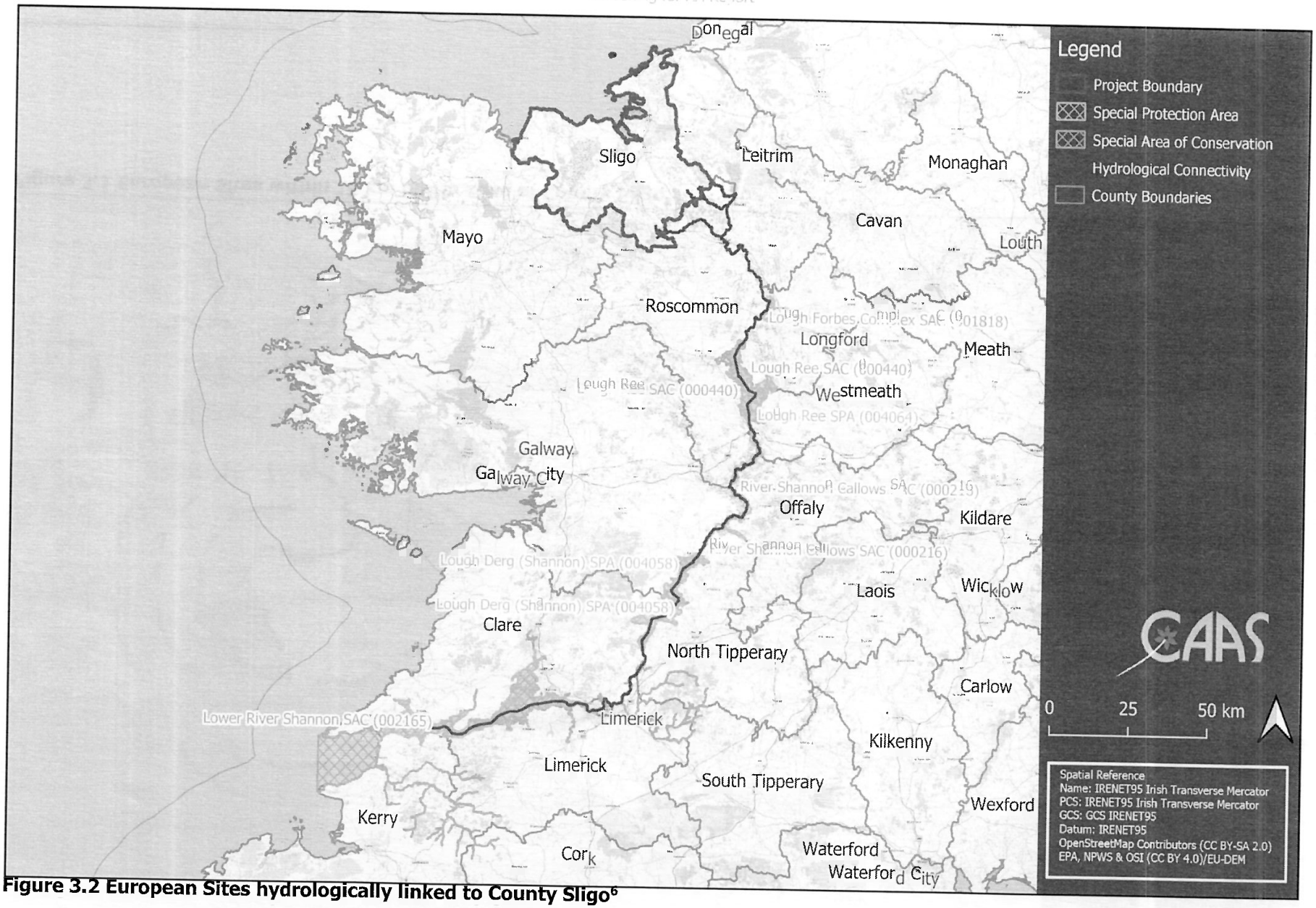


Figure 3.2 European Sites hydrologically linked to County Sligo[6]

[6] Source: NPWS (datasets downloaded January 2023)

3.3 Assessment Criteria and Screening

3.3.1 Is the Plan Necessary to the Management of European Sites?

The overarching objective of the Plan is not the nature conservation management of the sites, but to guide the sustainable economic and community development of the County to 2030[7]. Therefore, the Plan is not considered to be directly connected with or necessary to the management of European sites.

3.3.2 Elements of the Plan with Potential to Give Rise to Effects

Implementing the Sligo 2030 Plan will involve Sligo County Council helping to facilitate, promote, support and coordinate stakeholders in their activities in a way that is consistent with existing and emerging plans setting out public policy for sustainable development, including that relating to the economy, communities, infrastructure, land use tourism and environmental protection and environmental management.

The Plan is situated alongside this hierarchy of statutory documents that has been subject to environmental assessment/screening for environmental assessment, as appropriate, and forms the decision-making and consent-granting framework. The Plan does not provide consent, establish a framework for granting consent or contribute towards a framework for granting consent; the Plan is not binding on Sligo County Council when undertaking its functions with respect to whether or not to grant development consent for a project.

The Plan fully aligns with the provisions of the existing National Planning Framework, Ireland 2040, National Climate Action Plan 2023, Housing For All 2021, the Regional Spatial and Economic Strategy 2020-2032 and the current County Development Plan, all of which have been subject to legislative requirements relating to public consultation and environmental assessment/screening for environmental assessment. As such, the Plan is wholly subject to the requirements of the provisions set out in these documents (and any subsequent revisions to these documents), including provisions relating to sustainable development, environmental protection and environmental management that have been integrated into these documents, including through SEA and AA processes, and does not introduce any alterations or additions to those provisions. Furthermore, Sligo County Council has confirmed that the provisions of the Plan have already been provided for under existing plans/strategies/etc. that have already been subject to SEA/AA and/or Screening for SEA/AA.

In order to be realised, projects included in the Plan (in a similar way to other projects from any other sectors) will have to comply, as relevant, with various legislation, policies, plans and programmes (including requirements for lower-tier Appropriate Assessment, Environmental Impact Assessment and other licensing requirements as appropriate) that form the statutory decision-making and consent-granting framework, of which the Plan is not part and does not contribute towards.

Therefore, the Plan does not introduce any additional sources for effects that were not already considered by the existing planning framework and associated AA processes.

3.3.3 Screening of Sites and Types of Potential Effects

Table 3.1 examines whether there is potential for effects on European sites considering information provided above, including Appendix I. Sites are screened out based on one or a combination of the following criteria:

- Where it can be shown that there are no significant pathways such as hydrological links between the Plan and the site to be screened;
- Where the site is located at such a distance from that area to which the Plan relates those effects are not foreseen; and
- Where it is that known threats or vulnerabilities at a site cannot be linked to potential impacts that may arise from the Plan.

As outlined in the European Commission Environment DG document *"Assessment of plans and projects significantly affecting Natura 2000 sites: Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC"* outlines the types of effects that may affect European Sites.

[7] Note that the Plan is not binding on Sligo County Council when undertaking its functions with respect to whether or not to grant development consent for a project.

These include effects from the following activities:

- Land take
- Resource Requirements (Drinking Water Abstraction Etc.)
- Emissions (Disposal to Land, Water or Air)
- Excavation Requirements
- Transportation Requirements
- Duration of Construction, Operation, Decommissioning

In addition, the guidance document outlines the following likely changes that may occur at a designated site, which may result in effects on the integrity and function of that site:

- Loss/reduction of habitat area;
- Habitat or species fragmentation;
- Disturbance to key species;
- Reduction in species density;
- Changes in key indicators of conservation value (water quality etc.); and
- Climate change.

Assessment of potential impacts on European Sites is conducted utilising a standard source-pathway model.

Each of these potential changes are considered below and in Table 3.1 with reference to the QIs/SCIs of all of the European sites identified

Oifig an Rialaitheora Pleanála
Office of the Planning Regulator

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

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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 strategy	Recommendation 1 Recommendation 2	Observation 1

Housing strategy and relevant policies	Recommendation 3	Observation 2
Economic development and employment	-	Observation 3
Sustainable transport and accessibility	-	Observation 4 Observation 5
Climate action and renewable energy	Recommendation 4	-
Flood risk management	Recommendation 5	-
Environment, heritage and amenities	-	Observation 6
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.

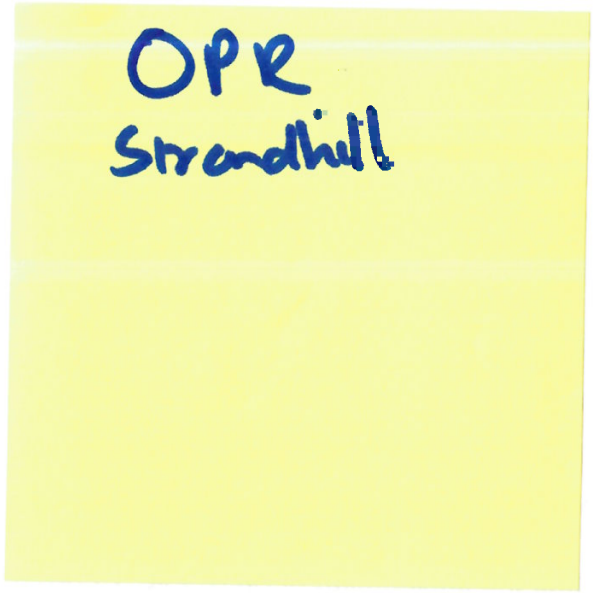
The third tier is occupied by the Satellite Villages of Ballysadare, Collooney, Coolaney, Grange and Strandhill. The Office agrees with the approach outlined in the core strategy, which is to *'carefully manage development, prioritising the provision of adequate service infrastructure, recreational and 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.

Tier.

23 per village

74 units per village


OPR
Strandhill

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

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.

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

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 aspirations[1] (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;

(ii) 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

Flood Risk
Strandhill

WATER.

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.

Rezoning
WATER
Strandhill

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,



Anne Marie O'Connor

Deputy Regulator and Director of Plans Evaluations

An Roinn Tithíochta,
Rialtais Áitiúil agus Oidhreachta
Department of Housing,
Local Government and Heritage

Flood Risk management

Ministerial Direction Strandhill

8 November 2024

For the Attention of: Mr. Martin Lydon, Chief Executive

Sligo County Council,
County Hall,
Riverside,
Sligo
F91 Y763

Section 31 of the Planning and Development Act 2000
Notice of Intention to issue a Direction to Sligo County Council
regarding the Sligo County Development Plan 2024-2030

Dear Martin,

Consequent to a recommendation made to me as Minister by the Office of the Planning Regulator (the Office) on 27 October 2024 in connection with the Sligo County Development Plan 2024–2030, as adopted by the elected members of Sligo County Council on 30 September 2024, and pursuant to section 31 of the Planning and Development Act 2000 (as amended) (the Act), I write to give notice of my intention to issue a direction to Sligo County Council to take certain measures specified in this notice.

Opinion

On consideration of the recommendation made to me by the Office, I have formed the opinion that:

(i) Sligo County Council, in making the development plan, has failed to implement recommendations made to it, as planning authority, by the Office under section 31AM of the Act;

(ii) The Plan, as made, fails to set out an overall strategy for the proper planning and sustainable development of the area;

(iii) The Plan is inconsistent with national and regional policy objectives specified in the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy for the Northern and Western Region (RSES);

(iv) The Plan, as made, is not in compliance with the requirements of the Act.

Oifig an tAire Stáit atá freagrach as an Rialtas Áitiúil agus Pleanáil
Minister of State for Local Government and Planning

Teach an Chustaim, Baile Átha Cliath, D01 W6X0
Custom House, Dublin, D01 W6X0
T +353 1 888 2405 | ministerofstate@housing.gov.ie
www.gov.ie/housing

A draft of the Direction accompanies this notice and I request that you publish notice of this draft Direction, no later than two weeks after receipt of this notice. The reasons for the Direction are set out in the Statement of Reasons incorporated in the attached draft Direction and further detail is provided in the Summary of Issues as set out below.

Amended April 2024

Process to Date

The draft Sligo County Development Plan 2024–2030 (the draft Plan) was on public display from 13 October to 22 December 2023. The Office of the Planning Regulator made a submission to the draft Plan on 22 December 2023, containing five (5) recommendations which addressed a broad range of issues.

The elected members, having considered the draft Plan and the Chief Executive's Report on submissions received (March 2024), resolved to amend the draft Sligo County Development Plan 2024–2030 on 22 April 2024.

The material alterations to the draft Plan were on public display from 7 June 2024 to 5 July 2024. The Office made a submission on 5 July 2024 containing eight (8) recommendations. The Office's recommendations at the Material Alterations stage included:

- MA Recommendation 1, 2, 3 and 4 – Zoning of land for residential use
- MA Recommendation 5 – Zoning of land for non-residential use
- MA Recommendation 6 – Access to national roads
- MA Recommendation 7 – Greenways and recreational infrastructure
- MA Recommendation 8 – Flood Risk Management

The elected members of Sligo County Council resolved to make the Sligo County Development Plan 2024–2030 at a council meeting on 30 September 2024. Subsequently, the planning authority issued a notice letter under section 31AM(6) of the Act to the Office advising of the making of the Development Plan and specifying the recommendations of the Office that were not complied with.

Having reviewed the Chief Executive's reports on the draft Plan and material alterations to the draft Plan, the notice of the making of the Development Plan and the reasons in the notice letter, the Office has concluded that, with the exception of the items below, the recommendations of the Office have been responded to and have been addressed to the satisfaction of the Office, or are otherwise considered satisfactory within the legislative and policy context. The outstanding matters, therefore, relate to the following:

- Residential zoning objectives and material amendments
  (Recommendation 2, MA Recommendations 1, 2, 3 and 4)

- Material amendments to zone land for employment generating uses, tourism uses, and community facilities
  (MA recommendation 5)

- Access to National roads
  (MA Recommendation 6)

- Flood risk management
  (MA Recommendation 8)

Summary of Issues

OPR Recommendation 2 and MA Recommendations 1, 2, 3 4 and 8

Having regard to the core strategy of the draft Plan; national and regional policy objectives for compact growth; tiered approach to zoning and flood risk management; the provisions of the Development Plans Guidelines for Planning Authorities (2022); The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009); and section 10(2)(n) of the Act, the planning authority was required to make the Plan without certain specified amendments to residential land use zonings.

Notwithstanding the above, the elected members decided to make a significant number of the amendments referred to in the Office's submission, contrary to your recommendations as Chief Executive.

Having carefully considered the elected members' reasons, as set out in the section 31AM(6) notice submitted, the Office accepted the rationale provided by the elected members for their decisions in a number of cases. However, with respect to lands identified in sections 2(a)(i) and 2(b)(i) to (xiii) and 2(b)(xv) to (xviii) of the enclosed draft Direction, the Office has concluded that the zonings are inconsistent with objectives of national and regional planning policy, and fail to have regard to Ministerial planning guidelines under section 28 of the Act. Please see the statement of reasons incorporated in the draft Direction for specific details in this regard.

OPR MA Recommendation 5

Having regard to the provision of employment locations that can support compact and sustainable development; national and regional policy objectives for compact growth, tiered approach to zoning, flood risk management; the provisions of the Development Plans Guidelines for Planning Authorities (2022); The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009); the Spatial Planning and National Roads Guidelines (2012); and section 10(2)(n) of the Act, the planning authority was required to make the Plan without certain specified amendments to non-residential land use zonings in Enniscrone, Ballysadare and Easky.

Notwithstanding the above, the elected members decided to make a number of the amendments referred to in the Office's submission, contrary to your recommendations as Chief Executive.

Having carefully considered the elected members' reasons, as set out in the section 31AM(6) notice submitted, the Office has concluded that the amendments are inconsistent with objectives of national and regional planning policy, and fail to have regard to Ministerial planning guidelines under section 28 of the Act in respect to lands identified in sections 2(b)(xiv), (xix) – (xxi) of the enclosed draft Direction. Please see the statement of reasons incorporated in the draft Direction for specific details in this regard.

OPR Recommendation 6

Having regard to to national and regional policy objectives; the provisions of the Spatial Planning and National Roads Guidelines for Planning Authorities (2012), Sligo County Council was requested to make the Plan without MA PA-180 which proposed to insert additional text into the County Development Plan at section 33.9.1 Access onto National Roads, which provides for direct vehicular access onto national primary roads in certain circumstances.

It is noted that you as Chief Executive recommended to modify the text of PA 180 and to make the County Development Plan with the modified text. The elected members agreed with your recommendation and made the County Development Plan with the modified text.

It is also noted that Transport Infrastructure Ireland (TII) also separately requested the removal of this provision in its submissions to the planning authority, and that TII considers that the text included by PA 180 conflicts directly with the provisions of the section 28 Spatial Planning and National Road Guidelines, and strongly recommended that PA-180 is not adopted in the interests of adherence to the provisions of Government policy concerning

access to national roads and in the interests of road user safety on the high speed highly trafficked national road network.

Notwithstanding the above, the elected members proceeded to make the plan inclusive of the provision in question. National and regional policy objectives clearly indicate the importance of maintaining the strategic capacity and safety of the national roads network.

Please refer to the specific provisions referenced in the statement of reasons incorporated in the draft Direction for further details.

Decision

On review of the recommendation issued by the Office, corresponding documents and analysis, I, as Minister, am of the opinion to issue a draft Direction in relation to:

- Recommendation (2) a. (i),
- Recommendation (2) b. (i) to (xii),
- Recommendation (2) b. (xiv) to (xxi),
- Recommendation (2) c.

and in that regard, I refer you to the Statement of Reasons set out in the enclosed draft Direction.

I have decided not to issue a draft Direction in relation to Recommendation (2) b. (xiii) *(which relates to Material Alteration PAZ 60 in Easky*), which if accepted, would alter the 'New Residential (nRES)' zoning objective that applies to an area of land located in Easky, contrary to the decision of the elected members of Sligo County Council.

My reason for not issuing a draft Direction in respect of the Office's recommendations relating to PAZ 60 is set out below:

i. The subject lands are Tier 1 serviced lands and were zoned for residential use in the Sligo County Development Plan 2017-2023.

Accordingly, the zoning of these lands for new residential uses is reasonable in the circumstances.

In light of my decision you will note that there are consequent changes to the numbering of section 2) of the draft Direction as issued, which now reads (2) b. (i) to (xx).

Noting the aforementioned, I, as Minister, consider that the plan as made:

- is not in compliance with the provisions of the Act including:
  - Section 10(1), which requires the development plan to set out an overall strategy for the proper planning and sustainable development of the area.
  - Section 10(1A) which requires that the development objectives in the development plan are consistent with national and regional development objectives.
  - Section 10(2)(n) of the Act concerning the promotion of sustainable settlement and transport strategies and the obligations under the Climate Action Plan and the Low Carbon Development Act 2015.
  - Section 27(1), which requires the planning authority to ensure that when making a development plan, that the plan is consistent with any regional spatial and economic strategy in force for its area.
  - Section 28, as the statement under section 28(1A)(b) that is appended to the development plan fails to include information which demonstrates that the planning authority has formed the opinion that it is not possible to implement the policies and objectives of the Minister contained in the Development Plans Guidelines (2022), the Spatial Planning and National Roads Guidelines (2012) and the Flood Risk Management Guidelines (2009); because of the nature and characteristics of the area, in addition to the reasons for the forming of that opinion contrary to section 28(1B)(b).

- is inconsistent with objectives of the National Planning Framework, in particular NPO 3c (Compact Growth), NPO 18a (Proportionate Growth), NPO 57 (Flood Risk Management), NPO 60 (Natural and Cultural Heritage), NPO 72a (tiered approach to zoned land), NPO 72b (cost of servicing lands), NPOc (Unserviced lands), NPO 74 (delivery of National Strategic Outcomes), and is also inconsistent with the National Strategic Outcome 1 (Compact Growth) and NSO 2 (enhanced regional accessibility, including the maintenance of the strategic capacity and safety of the national road network).

- is inconsistent with objectives of the Regional Spatial and Economic Strategy for the Northern and Western Region specifically RPO 3.2 (Compact Growth), RPO

3.7.39 (compact growth within Sligo's existing built up urban area), RPO 3.10 (Flood Risk Management), RPO 5.14 (cultural and built heritage), and RPO 6.5 (Strategic Capacity and Safety of National Roads).

- fails to have regard to Ministerial Guidelines issued under Section 28 of the Act (refer to pages 63 and 63 of the OPR s.31AM(8) notice letter), specifically:
    - Development Plans, Guidelines for Planning Authorities (2022);
    - Spatial Planning and National Roads, Guidelines for Planning Authorities (2012);
    - The Planning System and Flood Risk Management, Guidelines for Planning Authorities (2009)

The Development Plan has also not been made in a manner consistent with, and has failed to implement, the recommendations of the Office of the Planning Regulator under section 31AM of the Act.

Having regard to the matters set out above, the Development Plan fails to set out an overall strategy for the proper planning and sustainable development of the area and is not in compliance with the requirements of the Act.

Measures to be taken – Draft Direction

Accordingly, having considered the recommendation of the Office, I am issuing a draft Direction pursuant to section 31 of the Planning and Development Act 2000 (as amended), to direct Sligo County Council with regard to the Sligo County Development Plan 2024-2030.

In accordance with section 31AN(1) of the Act, having considered and taken account of the proposed draft direction submitted by the Office and the correction notice, the draft Direction as issued incorporates minor editorial amendments which are not material in nature and do not alter the substance of the Office's recommended draft direction (Point I of the Statement of Reasons incorrectly lists Ballintogher and Cliffony and this has now been amended accordingly).

The draft Direction sets out the following steps for the Planning Authority to take:

a. Delete the following zoning objectives from the adopted County Development Plan:

(i) the lands on the L3203 on the western approach to Grange, i.e. the subject land reverts to not zoned from Strategic Land Reserve;

b. Delete the following material alterations from the adopted County Development Plan such that the subject lands revert to as indicated in the draft County Development Plan:

(i) PAZ 9, i.e. the subject land reverts to Strategic Land Reserve (SLR) from New Residential (nRES);
(ii) PAZ 11, i.e. the subject land reverts to Green Belt from New Residential (nRES) and Open Space (OS) and the Development Limit reverts to the draft Plan;
(iii) PAZ 12, i.e. the subject land reverts to Green Belt (GB) from New Residential (nRES);
(iv) PAZ 13, i.e. the subject land reverts to Strategic Land Reserve (SLR) from New Residential (nRES);
(v) PAZ 14, i.e. the subject land reverts to Green Belt (GB) from New Residential (nRES);
(vi) PAZ 15, i.e. the subject land reverts to Green Belt (GB) from New Residential (nRES) and Strategic Land Reserve (SLR);
(vii) PAZ 31, i.e. the subject lands revert to Open Space (OS) from New Residential (nRES)
(viii) PAZ 32, i.e. the subject lands revert to Green Belt (GB) from New Residential (nRES)
(ix) PAZ 33, i.e. the subject lands revert to Green Belt from New Residential (nRES)
(x) PAZ 42, i.e. the subject lands revert to Green Belt (GB) from New Residential (nRES)
(xi) PAZ 45, i.e. the subject lands revert to Green Belt (GB) from New Residential (nRES)
(xii) PAZ 57, i.e. the subject lands revert to Strategic Land Reserve (SLR) from New Residential (nRES)
(xiii) PAZ 62, i.e. the subject lands revert to Green Belt from Tourism (TOU)
(xiv) PAZ 63, i.e. the subject lands revert to Green Belt (GB) from Rural Village (RV)
(xv) PAZ 76, i.e. the subject lands revert to Green Belt (GB) from Rural Village (RV)

(xvi) PAZ 79, i.e. the subject lands revert to Green Belt (GB) from Rural Village (RV), and the Development Limit reverts to the draft Plan

(xvii) PAZ 80, i.e. the subject lands revert to Green Belt (GB) from Rural Village (RV), and the Development Limit reverts to the draft Plan

(xviii) PAZ 34, i.e. the subject lands revert to Green Belt (GB) from Tourism (TOU) and Open Space (OS)

(xix) PAZ 41, i.e. the subject lands revert to Green Belt (GB) from Business/Industry/ Enterprise (BIE)

(xx) PAZ 44, i.e. the subject lands revert to Green Belt (GB) from Business/Industry/ Enterprise (BIE)

c. Delete the following text at section 33.9.1:
Where direct vehicular access onto national primary roads cannot be avoided (such as situations arising from national road realignment schemes), a Departure from TII Publications Standards DN-GEO-03060 with justification shall be required, as provided for in Section 5.5. Direct Accesses of DN-GEO-03060. In all cases, the number of accesses on to the national road should be minimised, either by consolidating them into a single access point, or connecting them to existing side roads. The sight distances required for access onto national primary and secondary roads are set out in Table 33.8. The sight distances are measured from the access point to the near-side edge of the carriageway in accordance with the TII Publications Standards DN-GEO-03031 and DN-GEO-03060.

and apply all necessary consequential updates to the text of the plan consistent with the foregoing.

Please note that in accordance with section 31(4)(c) and Section 31(6) of the Act, those parts of the Sligo County Development Plan 2024–2030 referred to in this notice shall be taken not to have come into effect, been made or amended.

Next Steps – Procedural requirements

I wish to draw your attention to the public consultation obligations under section 31 of the Planning and Development Act 2000 (as amended), and the initial requirement as Chief Executive, under section 31(7) to publish notice of the draft Direction no later than 2 weeks after receipt of this notice, stating that the draft Direction may be inspected as specified in the notice, for a period of not more than 2 weeks.