

# Submission on the Draft National Planning Framework: Ireland 2040

On behalf of the Sligo BID CLG in respect of  
the settlement of Sligo



Planning & Environmental Consultants

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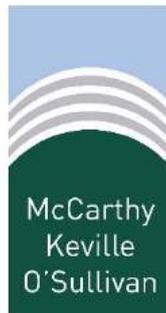
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# 1 EXECUTIVE SUMMARY

Sligo town is the most important settlement in the North West of Ireland and is the obvious candidate in the North West for designation as a regional centre. Although the population of Sligo is 25,219<sup>1</sup>, the 'greater' Sligo area has a population of as much as 60,000 people<sup>2</sup>. Sligo is a growing conurbation located in the heart of the North West and already functions as the administrative, economic and cultural centre for South County Donegal, County Sligo and parts of Counties Leitrim, Roscommon and Mayo, serving key towns such as Ballina, Castlebar, Westport, Carrick-on-Shannon and Donegal town. The population of the North West as a whole is in the region of 250,000 people and Sligo is the regional anchor for this entire catchment area. In addition, Sligo IT and St. Angela's College host 7,500 term time students.

As currently drafted, the NPF would see Sligo town grow by approximately 40%, the equivalent of around 8,000 people. This level of growth is insufficient to enable Sligo fully establish itself as the economic hub required in the North West. Sligo's growth potential allows for an increase in population far in excess of 8,000. In the Sligo and Environs Development Plan 2010-2016, which is the current statutory planning document for the town, there is sufficient lands zoned in the settlement (including the strategic land reserve) for the provision of housing for up to 26,000 new residents. Furthermore, Sligo's Main Drainage Scheme, a 50,000-PE wastewater treatment plant completed in 2008, has the capacity for expansion to serve 80,000 PE (population equivalent). Failure to utilise this capacity, where it already exists, would contravene the principles of proper planning and sustainable development and would be detrimental to Sligo and the region.

Sligo BID CLG contend that special consideration should also be given to Sligo given its regional importance. The omission of Sligo as a priority region is a serious threat to further regional imbalance and a missed opportunity given the capacity of Sligo to harbour significant growth and absorb some of the pressure from the greater Dublin region. There is already a strong foundation in place in a demographic and geographic context for achieving critical mass which will drive Sligo on to further growth. Located centrally in the European Entrepreneurial Region 2018, the omission of Sligo in the Draft NPF is a complete contradiction of the EU's recognition of the ability of the region. Similarly, there is an apparent contradiction between the vision of the Draft NPF and the Irish Government's announcement of a Task Force to pursue the Atlantic Economic Corridor. The four recognised cities in the Draft NPF, namely Galway, Limerick, Cork and Waterford, could of course form the basis of this strong alternative spatial development model, however simply to focus on those four urban centres is to ignore the needs of large areas of the country to the west and north-west and indeed the significant regional urban centre of Sligo.

It is of paramount importance that an urban agglomeration in the North West is promoted and focussed around Sligo. This would have a clear impact on reinforcing the urban structure of the entire region. The adopted National Planning Framework should identify Sligo as a key city in the region and, on foot of this designation, must direct significant infrastructure investment to the town. This infrastructure investment will facilitate and lay the foundation for growth in population and employment. This investment should be targeted at ensuring that Sligo has better connectivity with Dublin and the other city regions. Sligo has all the characteristics of a city and

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<sup>1</sup> Sligo's town population is made up of the inner town (19,199), Collooney (1610), Standhill, (1753), Ballysadare (1350), Rosses Point (883), Ballincar (424).

<sup>2</sup> Sligo County Retail Strategy 2017-2023 – Section 3.1

competes as a city. Furthermore, the Greater Sligo population is comparable to a city. This submission requests that the key position of Sligo city is addressed in the NFP in terms of its role as a key city in the Region (Sligo City Region) to facilitate the future growth, success and sustainability of what is still technically a town.

## 2 INTRODUCTION

### 2.1 Introduction

On behalf of our client, **Sligo BID (Business Improvement District) CLG**, we wish to make a submission on the draft publication of *'Ireland 2040 Our Plan - National Planning Framework'*. The purpose of this submission is to ensure that the finalised and adopted National Planning Framework: Ireland 2040 (NPF) takes proper cognisance of the importance of Sligo in the national and regional context and that this importance is reflected in its designation as a significant growth centre in the adopted plan. Furthermore, this submission will seek to ensure that the policies, objectives and provisions of the adopted NPF facilitate targeted growth which will contribute to the expansion and growth of business and enterprise in the town and the surrounding area.

The designation of Sligo as a significant growth centre in the NPF and the inclusion of policies and objectives which bolster this designation will drive both public and private investment into the town and the surrounding area. Sligo has historically suffered from a lack of connectivity with the major urban centres in the country which has led to depressed economic growth and in turn migration from the town, and the North West as a whole, to the greater Dublin area and Galway. The first national planning framework for the country (National Spatial Strategy 2002-2020) identified a number of the issues which affect Sligo and indeed, proposed measures to address these issues. However, in 2017 Sligo still suffers from a number of the issues which historically restricted its growth and success and these include lack of connectivity, lack of investment and outward migration.

### 2.2 About Sligo BID Company CLG.

Sligo BID CLG is a non-profit Company Limited By Guarantee whose purpose is to implement, manage, administer and renew the BID scheme. The Sligo BID concept is an initiative designed to increase the footfall to Sligo town centre, to attract more businesses and to secure a long term sustainable model for the management of the town. Sligo BID represents businesses in the town and is designed to benefit all of the business people in Sligo, and in turn the city/town's inhabitants.

Sligo BID (Business Improvement District) was the first BID to form on the west coast of Ireland (July 2015). Sligo BID formed as a direct result of the "Better Towns through Partnership" Project run by Sligo County Council from September 2013 to March 2015 and was the first town to appoint a Town Centre Manager in the country.

Sligo BID was highlighted as an example of best practice in *'A Framework for Town Centre Renewal'*. The Framework identifies the key attributes of a successful town centre. It also sets out an Action Plan and the existing supports for Town Centre Renewal. The Framework notes that the key objective of Sligo BID is to develop and implement initiatives designed to promote and improve the trading environment.

## 3 CONTEXT

### 3.1 Sligo: An Overview

Sligo is located in the north-western corner of Ireland approximately 180 kilometres north west of Dublin and approximately 45 kilometres south west of the border with Northern Ireland. In practice Sligo and its environs incorporate the settlements of Collooney, Strandhill, Ballysadare, Rosses Point and Ballincar which gives a population total of 25,219. Sligo town settlement has a population of 19,119<sup>3</sup> people within its administrative boundary making it the 24<sup>th</sup> largest urban centre in the country in its own right. This population is based on a boundary which is not at all representative of the full extent of the town of Sligo and when taking into account Sligo town and its environs, the increased population total elevates Sligo to the 13<sup>th</sup> largest urban centre in the country. It is the major urban settlement in the North West of the country. Sligo is home to two third level education facilities, Sligo Institute of Technology and St. Angela's College. It is also home to Sligo University Hospital, an acute general hospital serving the northwest of the country.

The town is located on a low lying plain between Lough Gill and the Atlantic Ocean, the Garvoge River flows from Lough Gill through the town discharging into Sligo Harbour. Sligo is circled by hills and mountains with Keelogyboy Mountain to the north east, Knocknarea to the west in Strandhill and Slieve Dargan to the south west. Benbulbin further to the north is visible from the town.

Sligo serves as an administrative, employment, commercial, health and education centre for a large catchment area, while also acting as an important distribution centre for the North West. It is the primary location for industry and enterprise within the county and the North West as a whole due to its large pool of skilled workers, ease of access and relatively good telecommunications infrastructure. The availability of labour, transport facilities and infrastructure attracts enterprise and stimulates agglomeration effects in the local economy<sup>4</sup>.

The natural scenery of County Sligo is amongst the finest in the country. It is the County's primary tourist attraction. The mountains, forests, woodlands, lakes, rivers, coastline, offshore islands and largely unspoiled rural landscape offer a wide range of natural amenity and recreational pursuits<sup>5</sup>. This makes the town of Sligo an important accommodation location for tourists. In addition, Sligo has many attractions in its own right such as the Sligo County Museum and The Model, Home of the Niland Collection. Sligo is the nearest point to Dublin on the Wild Atlantic Way, which is one of the most popular tourist destinations in the country. It is also placed in the second tier of the national retail hierarchy, serving as a 'regional' retail centre for the western part of the Border region.

Sligo is not served by a motorway. In terms of the national motorway network the nearest embarkation point is Tuam following the recent opening of the M17 between Gort and Tuam. If travelling by car from Dublin to Sligo the only feasible option is the M4-N4 route via Mullingar. In both cases the majority of the route would be on national primary roads as opposed to motorways. The N4 between the village of Collooney and Sligo town centre is formed by Type 1 Dual Carriageway which provides an important link between Sligo and its surrounding hinterland to the south. In addition, the

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<sup>3</sup> Census of Ireland 2016

<sup>4</sup> Sligo County Development Plan 2017-2023 – Section 4.2.3: Industry and Enterprise Locations

<sup>5</sup> Sligo County Development Plan 2017-2023 – Section 4.4 Tourism Development

proposed upgrade to the N4 between Collooney to Castlebaldwin is scheduled for completion in 2020.

While the significance of Sligo Port in national terms is quite low, it remains important in the regional and local economy, supporting local industry and providing an import/export transportation facility. Capital and maintenance dredging is required within the harbour to enhance the use and longevity of the Port<sup>6</sup> but national funding has been withheld in the past decade which has stymied the Port's natural growth trajectory.

There are seven scheduled train services daily from MacDiarmada Station Sligo to Connolly Station, Dublin<sup>7</sup>. Bus Éireann Expressway operate eight bus services daily to Dublin from Sligo Bus Station<sup>8</sup>. Sligo Airport is located in Strandhill approximately 7.5km west of the Sligo town. As of 2011 no scheduled services operate to or from the airport although it is a base for Irish Coastguard operations and is also used by a local flying club.

In 2008, a new waste water treatment plant was commissioned for Sligo and its surrounding area. The plant accepts wastewater from a population equivalent of 50,000<sup>9</sup>. There is significant capacity within the plant for additional loading and therefore capacity for additional development within the town and the surrounding catchment.

Sligo also has world class internet connectivity. Sligo was the first town in Connacht to be serviced by SIRO's fibre-optic high-speed broadband rollout scheme. Broadband speed and quality is an important asset to Sligo's growth, and the rollout of this network creates a platform for future business development in the region, while also enhancing established businesses.

Sligo is the most important settlement in the North West of the country and although the population of Sligo conurbation is 25,219, the population of the 'greater' Sligo area is as much as 60,000 people<sup>10</sup>. The town is home to higher order services that serve the wider region and not just the town or the county. There are significant levels of infrastructure serving the town and there exists opportunities to upgrade and expand the existing infrastructure. There are also significant opportunities to grow the economic footprint of the town through enterprise and tourism. It is paramount that Sligo is identified as a key urban growth centre in the adopted National Planning Framework to facilitate the future growth, success and sustainability of the town and the wider region.

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<sup>6</sup> Sligo County Development Plan 2017-2023 – Section 8.6 Port and Harbours

<sup>7</sup> [http://www.irishrail.ie/media/07\\_dublin-sligo\\_25052015.pdf](http://www.irishrail.ie/media/07_dublin-sligo_25052015.pdf) (Accessed 07/03/17)

<sup>8</sup> <http://www.expressway.ie/route23.php> (Accessed 07/03/17)

<sup>9</sup> <http://www.caw.ie/case-studies/sligo-wastewater-treatment-works> (Accessed 07/03/17)

<sup>10</sup> Sligo County Retail Strategy 2017-2023 – Section 3.1

## 4 STRATEGIC PLANNING POLICY

### 4.1 Introduction

The purpose of this section is to identify and assess strategic planning policy at a national level which has guided the growth of Sligo in the recent past as well as providing a review of other existing and proposed national strategic planning policy. This submission will undertake a critical assessment of the *National Spatial Strategy 2002-2020* and as well as a review of *Realising our Rural Potential: Action Plan for Rural Development* in order to identify how these publications, and the adopted National Planning Framework, can contribute to a sustainable and successful town in Sligo.

### 4.2 National Spatial Strategy 2002-2020

The purpose of the National Spatial Strategy (NSS) was to provide a national planning framework for Ireland. The NSS aimed to achieve a better balance of social, economic and physical development across Ireland, supported by more effective planning. In order to drive development in the regions, the NSS proposed that areas of sufficient scale and critical mass will be built up through a network of gateways and hubs.

Within this framework Sligo was identified as a new national gateway which in effect ensured that the town was targeted for growth. Gateways were identified as having a strategic location, both nationally and relative to their surrounding areas, and were intended to provide national scale social, economic infrastructure and support services. Gateways were therefore seen as engines of regional and national growth.

The NSS stated that critical mass in the west and north west could be strengthened by developing Sligo as a gateway to capitalise on its strategic location and energise its associated hinterland. Building up the national role and scale of Sligo was a crucial first step and this was to be achieved by the development of a planning, land use and transportation framework. It was envisaged that this framework would provide a focus around which local authorities, business and community interests could reach consensus on the future development of Sligo and utilise its substantial physical capacity for development, while safeguarding its outstanding natural setting.

In addition to the macro-level objectives and policies relating to the future development of Sligo, more specific micro-level actions were identified which were to contribute to building Sligo's national role and these included items such as providing improved access to Sligo that built on previous investment in road and rail routes, improving reliability of electricity and gas supply in western, north western, border and north eastern parts of the country and the provision of a Derry-Sligo-Galway-Limerick-Cork-Rosslare rail link (Western strategic rail link).

#### 4.2.1 Critical Assessment – National Level

The NSS was not a success in the national context and the reasons can be broadly summarised under the following headings:

- **Initial Gateway and Hub Designations**

In the first instance, too many hubs and gateways were identified (i.e. 9 gateways and 11 hubs) for growth which immediately spread resources too thinly over too many locations in disparate geographical locations. The initial designation of settlements became politicized which resulted in too many areas being identified for growth to satisfy individual political ambitions.

Attempts to achieve nationwide investment and growth diluted the potential positive impact of the NSS.

- **Decentralisation**  
The Decentralisation Programme announced by the Government in December 2003 saw the headquarters of eight government departments decentralised from Dublin to a range of gateway, hub and other towns. These towns included Newbridge, Carlow, Trim, Longford and Carrick-on-Shannon which were not identified in the NSS. However, in order to accommodate new residents, these towns had to build more houses, invest in infrastructure etc. which ultimately drew growth and investment away from the settlements where it should have been directed.
- **Disconnect between NSS and Local Level Planning**  
Despite the provisions set out in the NSS at local level planners continued to zone lands for housing and other development and continued to grant planning permission for development on these lands. The continued inappropriate zoning of lands for development throughout the boom years was ultimately politically driven however the decisions to permit development on these lands were entirely planning ones. Brian Hughes, in his 2015 article on the subject, articulates this view as follows –

*'Instead of the intended objective of achieving accelerated growth in the nominated Gateways and Hubs Balanced Regional Development encouraged additional, geographically scattered one-off housing completions.'*<sup>11</sup>

He goes on to note that the construction of these housing developments continues apace despite the effects of the economic downturn. The approach set out in the NSS has, he notes, –

*'Promoted the proliferation of hundreds, of newly-emerging villages and small-town settlements, usually occurring at the expense of urban consolidation'*<sup>12</sup>

A striking indictment of the overall success of the National Spatial Strategy is set out in the National Planning Framework: Issues and Choices Paper (2017) which states that:

*'Not one of the twenty-two fastest growing towns in Ireland between 2002 and 2016 was an NSS gateway or hub settlement.'*<sup>13</sup>

#### **4.2.2 Critical Assessment – Sligo**

Sligo was identified as a gateway and an engine for regional and national growth in the NSS and there was a general commitment given to drive development in the North Western region. Furthermore, it committed to building up critical mass in the town in order to drive this development. However, in spite of the objectives of the NSS, in the

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<sup>11</sup> Hughes, B. (2015) Effects of the 2002-2020 National Spatial Strategy (NSS) on Ireland's Settlement Growth, Its cities, and on Other Gateways and Hubs, P5, Para 3

<sup>12</sup> Hughes, B. (2015) Effects of the 2002-2020 National Spatial Strategy (NSS) on Ireland's Settlement Growth, Its cities, and on Other Gateways and Hubs, P5, Para 4

<sup>13</sup> National Planning Framework: Issues and Choices Paper. Department of Housing, Planning, Community and Local Government, 2017. Print.

period 2002-2011, the population of the Sligo inner town settlement fell by 1.4% from 19,735 to 19,452<sup>14</sup>.

In addition to the identification of Sligo as a growth centre there were more specific actions identified which were intended to drive this growth and these primarily related to the provision of infrastructure. A longstanding issue for Sligo going back to before the implementation of the NSS was the lack of a motorway link with Dublin and with nearby gateways such as Galway. The NSS set out the requirement for the establishment of strategic radial corridors emanating from Dublin to towns and cities on the west coast including Sligo. Crucial to the success of these corridors was the requirement to improve road access to Sligo and to continue to invest in road and public transport links. As of 2017 Sligo remains without a motorway to either Dublin or Galway.

Similar to the above in terms of the requirement to improve connectivity and access to Sligo, in order to drive its growth, the NSS identified the importance of a Western Strategic Rail Link running from Derry-Sligo-Galway-Limerick-Cork-Rosslare. This aspiration ultimately took the form of the Western Rail Corridor with plans to link Limerick and Sligo by rail. Works were progressed in respect of the Western Rail Corridor with the Ennis-Athenry section opening in 2009. There are currently no plans to extend the corridor further, which means that Sligo is not directly connected to Galway, Ennis or Limerick by rail. In a similar vein to the connectivity issues identified above, scheduled services between Sligo Airport and Dublin Airport ceased in 2011.

The lack of investment in infrastructure for Sligo is also evidenced in the fact that as of October 2017 Gas Networks Ireland's pipe network does not extend as far as Sligo.

While the above summary is not exhaustive, it demonstrates that because of a lack of investment in infrastructure, among other things, Sligo did not grow as envisaged by the NSS.

### **4.3 Realising our Rural Potential: Action Plan for Rural Development**

The purpose of *'Realising our Rural Potential: Action Plan for Rural Development'* is to drive Rural Development by focusing on its positive attributes and unlock the potential of rural Ireland through a framework of supports at national and local level. While Sligo is obviously an urban centre, its catchment includes a large rural hinterland and the success of Sligo is central to the success of the rural areas that it serves. In this regard, it is important to take consideration of the actions and policies set out in the Plan.

A brief selection of key targets set out in the Plan, which are relevant in the context of Sligo, are set out below:

- Support the creation of 135,000 new jobs in rural Ireland by 2020 by supporting indigenous businesses.
- Accelerate the preparation for the rollout of high-speed broadband and ensure that all homes and businesses in rural Ireland are connected to broadband.
- Develop an Atlantic Economic Corridor to drive jobs and investment along the Western seaboard.

Sligo BID CLG welcomes these aspirations given that the creation of jobs in the rural hinterland surrounding Sligo will keep people in the region, which in turn will benefit the town. Similarly, the provision of high speed broadband in rural areas will allow

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<sup>14</sup> Central Statistics Office

individuals to work for businesses and enterprises in the town while still being based in the locality and surrounding hinterland. This will help to stem and reverse the flow of skilled workers to Dublin and other major urban centres. The retention of people and skilled people in Sligo and the surrounding hinterland will ultimately contribute to the success and sustainability of Sligo.

Sligo is specifically mentioned once within the document under the 'Growing and Attracting Enterprise' section and specifically Action 71 which is:

*'As part of the IDA's €150m property investment programme, complete the construction of three new advance buildings in Tralee, Castlebar and Sligo.'*<sup>15</sup>

In addition to the above, the Plan sets out the aspiration to improve rural transport links through a review of services, support for regional airports and investment in rural infrastructure. Sligo BID CLG welcome the commitment to the construction of IDA buildings in the town as this will attract business and enterprise and create jobs. Sligo BID CLG also welcomes the commitment to improving rural infrastructure links and support for regional airports such as Sligo Airport. The improvement of these links will improve connectivity between Sligo and the rest of the country, which, in turn, will attract people, investment and employment. It is vital that the National Planning Framework that is ultimately settled on should set out a joined-up approach that works in tandem with other existing plans and frameworks where possible and not against them. One such example is the Action Plan for Rural Development.

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<sup>15</sup> Realising Our Rural Potential: Action Plan for Rural Development. Publication. Department of Housing, Planning, Community and Local Government, 2017. Print.

## 5 SWOT ANALYSIS

We have prepared a SWOT analysis in the context of the National Planning Framework which sets out the strengths and weaknesses of the town of Sligo, the opportunities that exist for the town and the threats which it faces.

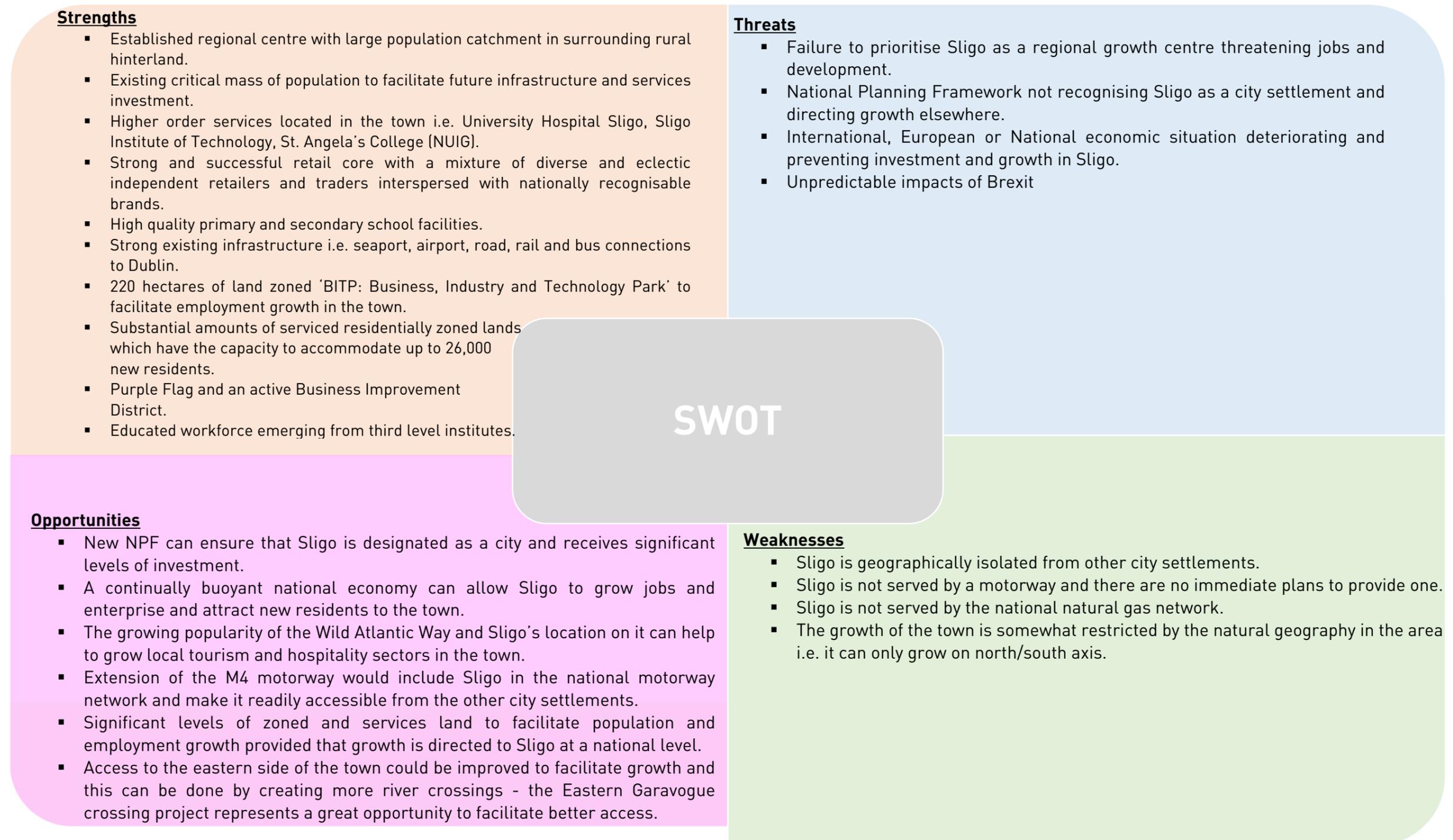


Figure 4.1 – SWOT Analysis

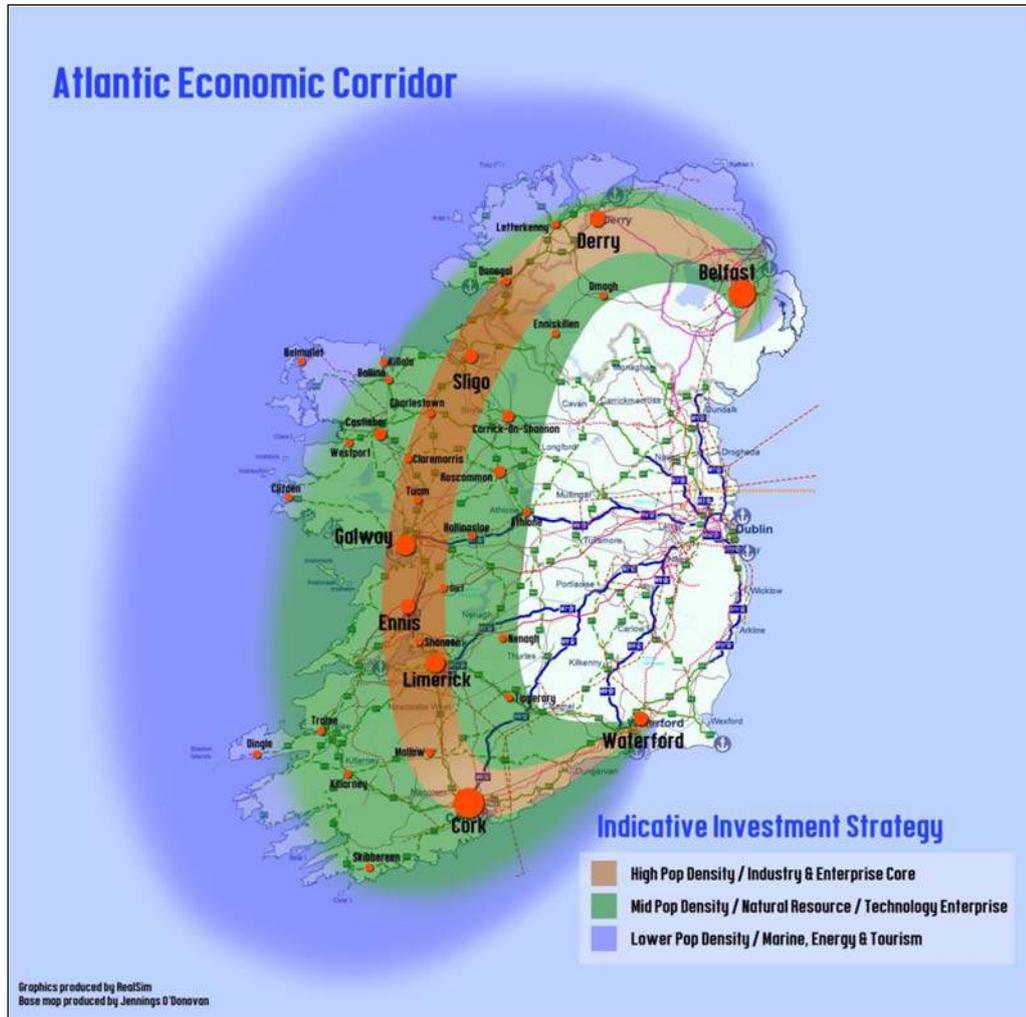
## 6 ASSESSMENT OF NPF DRAFT PUBLICATION

Sligo BID previously made a submission to the '*National Planning Framework: Issues and Choices Paper*' outlining a compelling case for the inclusion of the Sligo as a 'city settlement' in the adopted NPF. Following this pre-draft consultation period which concluded in March of this year, the Department of Housing, Planning, Community and Local Government have now published a draft of the National Planning Framework. Quite remarkably, and perhaps somewhat illogically, the Draft NPF makes little reference to Sligo or the significant role it plays in the urban structure of the North West. The following paragraphs herein Section 6 illustrate the main concerns of Sligo BID in relation to the draft publication.

### 6.1 Disparity with Atlantic Economic Corridor

On the 6<sup>th</sup> March 2017, An Taoiseach, Enda Kenny TD, and the Minister of State for Regional Economic Development at the Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs, Michael Ring TD, announced the establishment of the Atlantic Economic Corridor Taskforce. The establishment of this Taskforce is one of the actions committed to in the Realising our Rural Potential: The Action Plan for Rural Development (See Section 3.3 above). The concept of the Atlantic Economic Corridor is to contribute to effective regional development by creating sufficient scale along the western part of Ireland to match other regions, particularly the East coast, in attracting Irish and multinational investment, growing jobs and supporting vibrant local communities. The Taskforce aims to provide a platform for collaboration between stakeholders from the private sector, the public sector and the wider community, to identify how best an economic corridor can be created along the Atlantic seaboard, while ensuring that it is aligned with the new National Planning Framework. The taskforce will seek to maximise the region's potential in terms of natural resources, tourism, infrastructure and human capital, to increase the prosperity of the region and bring new investment to the cities and towns along the Atlantic seaboard.

A number of urban centres have been identified as gateways to the Wild Atlantic Way, namely Cork, Killarney, Limerick, Ennis, Galway, Westport, Sligo, Donegal and Letterkenny. The recently completed extension of the motorway network from Limerick to Tuam opens the possibility of a new linear city model with three key nodes of Limerick, Galway and Sligo delivering real critical mass along the western seaboard. Completion of the motorway network to Sligo would unleash the potential of the entire region. The completion of these works will assist the current key economic driver of Galway City and enable the progression of the emerging northern growth driver of Letterkenny – Derry.



**Figure 1: Atlantic Economic Corridor (extracted form Atlantic Economic Corridor Regional Strategy February 2016)**

The four recognised cities in the Draft NPF, Galway, Limerick, Cork and Waterford, could form the basis of a strong alternative spatial development model – that of an Atlantic Corridor. However simply to focus on those four urban centres is to ignore the needs of large areas of the country to the west and north-west and indeed the significant regional urban centre of Sligo. The National Planning Framework should complement, and be consistent with, the Government’s vision for the Atlantic Economic Corridor. The Draft NPF makes few references to the Atlantic Economic Corridor, offering little in the way of explanation of the concept or how it can be achieved. In this regard, the apparent gap between the vision of the Draft National Planning Framework and the Government announcement of a Task Force to pursue the Atlantic Economic Corridor must be bridged in the adopted NPF.

## 6.2 Disparity with European Entrepreneurial Region (EER) 2018

The European Union has named Ireland’s Northern and Western region as European Entrepreneurial Region (EER) 2018 recognising the “enormous strides” the region has taken to foster entrepreneurship and arrest decades of economic decline. The North West region consists of counties Donegal, Mayo, Galway, Sligo, Roscommon, Leitrim, Monaghan and Cavan and has a total population of 846,862<sup>16</sup>. Announced by the EU’s

<sup>16</sup> Census of Ireland 2016

Committee of the Regions, the award was given to the region because it has collectively developed policies that are transforming the area 'from adversity to advantage', and in the process, making it one of the most resilient and ambitious places in Europe. The EER award identifies and rewards EU regions and cities with outstanding, future-oriented entrepreneurial strategies.

The Government has warmly welcomed the accolade, with Minister for Community and Rural Affairs Michael Ring TD saying that "*The Northern and Western region is now finally being recognised as one of the most vibrant, responsive and entrepreneurial places in Europe,*" Minister Ring said.

Sligo is located in the heart of the European Entrepreneurial Region 2018. The remarkable omission of Sligo from the Draft NPF is a complete contradiction of the EU's recognition of the ability of the region.

### **6.3 Continued Disregard for the Regional Importance of Sligo**

The Draft NPF (pg 44) states, "*Only 7 of Ireland's 41 large towns had a population of more than 25,000 people in 2016 and more than half of the 41 large towns are located within the Dublin or Cork city regions*". This again highlights the failure of the NSS and further illustrates the disproportionate regional growth that has occurred. Despite its regional importance in the North West, the Draft NPF identifies no distinction between Sligo and the other 41 designated large towns in the country. In contrast, Dundalk is the only former NSS Gateway nominated in the Draft NPF for the purpose of "*developing the critical mass of the Newry-Dundalk area to compete with other large cities*" (Fig. 7.2 on page 103 in Section 7.3). Given that Dundalk is a large town located in the wider Dublin catchment area, it is not clear why it receives explicit support for growth while Sligo, which is outside the catchment area of any city, is not mentioned in a similar context. The Draft NPF refers repeatedly to the structural weakness of the North West region. However, despite this, there is no commitment to investing in large towns outside city catchment areas or any coherent plan to address the structural weakness of the North West. Specifically designating the settlement of Sligo for investment and growth (in a similar vein to Dublin, Cork and so on ....) would represent the first step in addressing the historic underinvestment and resultant poor economic performance of the region. Designation and recognition would create an economic anchor for the North West which in turn would invigorate and bolster the region. Targeted growth and investment in the settlement would help to ensure that jobs stay in the North West and which in turn would facilitate achieving a critical mass of population to elevate Sligo to one of the country's major urban centres. Focusing on Dundalk and other large towns in city catchment areas is to the detriment of large areas of the country to the west and north-west.

Furthermore, it appears that Sligo has also been overlooked in a regional context. The Draft NPF (pg 44) states; "*There are few large towns in the Northern and Western Region as a whole, with the strongest urban influence north of Galway City being the crossborder North-West City Region focused on Derry City in Northern Ireland.*" The development of the North-West City region focused on Derry City has been identified in the NPF as essential to achieving the potential of the North West and maximising its contribution to regional and all-island economic development. Sligo BID contend that the Draft NPF has been unequivocally dismissive of the position of Sligo within the North West. While Sligo BID support the concept of all-island economic growth, they are also apprehensive regarding the fallout from the forthcoming Brexit negotiations. Derry City is undoubtedly very important to the North-West region, however reinforcing the position of Sligo should be equally important, pre-empting any potential fallout

from Brexit which may regrettably damage links between Derry and the North West. In the context of a 'Hard Brexit' Donegal may be forced to look at forging stronger links with Sligo. The NPF as currently drafted, plans to have two cities, Galway and Derry, at either end of the West region, with approximately 300 KM between the cities. With this arrangement, and should a 'Hard Brexit' ensue, the urban structure of the North-West will be weakened further.

Outside the established five cities (Dublin, Galway, Cork, Limerick & Waterford), the Draft NPF has given special consideration to developing both Dundalk and Derry as city regions. Sligo BID contend that special and urgent consideration must now be given to Sligo town given its regional importance.

## 6.4 Implications of Growth Targets

The agreed EU/OECD definition of a 'city' is a settlement around a core centre with a population of more than 50,000 people. The Draft Plan identifies five cities within Ireland's urban structure; Dublin, Cork, Limerick, Galway and Waterford. In the Draft NPF, Sligo is considered to be a large town as it has a population greater than 10,000. Identification of Sligo as a 'large town' is a misnomer and does not reflect a true understanding of the makeup of the North West where Sligo is clearly the regional capital. Furthermore, Sligo's functional area extends far beyond the County boundaries, as demonstrated by the thousands of people who travel there daily for work from Mayo, Donegal, Roscommon and Leitrim. The population of Sligo and surrounding counties exceeds 400,000 and it has been estimated that the daytime population of Sligo can be as high as 40,000<sup>17</sup>.

The Draft NPF (pg 48) states that *"In recognition of a significantly weaker urban structure in the north and west of Ireland, overall targeted population growth for large towns with >10,000 population in 2016 within the Northern and Western Regional Assembly area, should generally be 40%, or almost twice projected national average growth."* As currently drafted, this would see Sligo grow by approximately 40%, the equivalent of around 8,000 people. This level of growth is insufficient to enable Sligo fully establish itself as the economic hub required in the North West. An arbitrary cap on the level of growth of Sligo will only serve to stifle the settlement itself but also the surrounding settlements of Tubbercurry, Ballymote, Boyle, Carrick on Shannon and Ballyshannon, and the region as a whole. Sligo's growth potential allows for a far greater increase in population than 8,000. As mentioned in Section 1 above, the Sligo and Environs Development Plan 2010-2016, which is the current statutory planning document for the town, there is sufficient lands zoned in the settlement (including the strategic land reserve) for the provision of housing for up to 26,000 new residents. Furthermore, Sligo's Main Drainage Scheme, a 50,000-PE wastewater treatment plant completed in 2008, has the capacity for expansion to serve 80,000 PE. Failure to utilise this capacity, where it already exists, would contravene the principles of proper planning and sustainable development and would be detrimental to Sligo and the region.

The Draft NPF acknowledges that in all three regional assembly areas, individual settlements can develop beyond the targeted growth rate. As it stands the NPF provides no guarantee as to the role or growth of Sligo, meaning that the future of Sligo will be determined through the Regional Spatial and Economic Strategies (RSESs) prepared North Western Regional Assembly. If the growth potential for Sligo and its

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<sup>17</sup> Sligo Ready to Grow Submission to the National Planning Framework by Sligo County Council 16 March 2017

environs is realised, the population of Sligo could reach approximately 50,000 which is deemed to be city levels according to the EU/OECD definition. Sligo BID strenuously argue that further consideration should be given to Sligo within NPF given its capacity for growth and prominent position on the western seaboard. In addition, Sligo IT and St Angela's College are estimated to host as many as 7,500 term time students.

#### **6.4.1 Hierarchy of Settlements**

The diagram below extracted from the Draft NPF (pg 77) indicates the level of service provision that applies to settlements of varying size across Ireland. The outermost ring of the diagram shows the typical high-level services that are available in cities. In this regard, we have also outlined how Sligo possesses each of the services/facilities which are traditionally attributed to a city settlement. Figure 2 illustrates how Sligo already competes with other larger cities in terms of the services and facilities which it can offer, reinforcing its position as a key service centre in the North West.



## **7 SLIGO AND THE NATIONAL PLANNING FRAMEWORK**

The adopted National Planning Framework (NPF) must learn from the mistakes of its predecessor. The NPF must drive Balanced Regional Development (BRD) and not of the type fostered in the National Spatial Strategy. The type of BRD which is pursued must strike a balance between Dublin and other key regional centres. At present, Dublin is attracting an unsustainable level of investment, jobs and growth to the detriment of the rest of the country. The Draft NPF has identified the 4 cities – Cork, Waterford, Limerick and Galway which will be targeted for major employment growth and housing construction and act as a counterbalance to Dublin. The Draft NPF offers no distinction between Sligo and the other 41 designated large towns in the country. Given its prominent position in the North West, Sligo is the most obvious large regional town that should be supported without reservation by the NPF and the National Investment Plan to achieve its growth potential in terms of employment and population growth, in parallel with infrastructural development and regeneration of the town centre. Plans for this growth should be developed concurrently with a capital works investment programme which ensures that infrastructure serving and within these centres can facilitate the growth i.e. road, rail, public transport, waste water etc.

The strategy of the NPF should be to identify the effective growth centres in each region and to prioritise the policies and investments which will enable them to flourish individually and also to collaborate effectively to form a real counterbalance to the established Greater Dublin conglomerate. Previous attempts to ensure that all settlements, of any significant size, within the State should be targeted for new jobs and significant levels of growth has proven to be a failure and has led to unsustainable patterns of development. Critical mass should be pursued in key regional centres, such as Sligo, and in turn their rural hinterlands and satellite towns will benefit and flourish. The adopted NPF must clearly set out the strategy referred to above with clear objectives and policies which will facilitate the desired outcomes. The primacy of Sligo as a settlement must be entrenched in the framework from the outset.

### **7.1 Why Sligo?**

Sligo is the most important settlement in the North West of the country and although the population of Sligo is 25,219 the 'greater' Sligo area has a population of as much as 60,000 people<sup>18</sup>. It is the obvious candidate in the North West for designation as a regional centre as it already functions as the administrative, economic and cultural centre for south County Donegal, County Sligo and parts of Counties Leitrim, Roscommon and Mayo. As mentioned, the population of the North West as a whole is in the order of 250,000 people and Sligo is the regional anchor for this entire catchment. There is already a strong foundation in place in a demographic context for achieving critical mass which will drive Sligo on to further growth.

Again, as mentioned, In the Sligo and Environs Development Plan 2010-2016, which is the current statutory planning document for the town, there is sufficient lands zoned in the settlement (including the strategic land reserve) for the provision of housing for up to 26,000 new residents. Following investment by Sligo County Council in the 2000's there is substantial capacity within the wastewater treatment system which can accommodate this growth. Therefore, Sligo is prepared for and has the infrastructure

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<sup>18</sup> Sligo County Retail Strategy 2017-2023 – Section 3.1

in place to accommodate significant population growth through the provision of new housing.

In addition to the capacity for population growth there is significant capacity for growth in industry and employment within the town. In the Sligo and Environs Development Plan 2010-2016 there are 220 hectares<sup>19</sup> of land zoned 'BITP: Business, Industry and Technology Park'. This is a substantial land bank which, with support from the IDA and other national bodies, could be promoted and incentivised for development. Population and employment growth are intrinsically linked and the conditions exist in Sligo to facilitate the substantial growth of both. Sligo BID urge the Department to ensure that the finalised National Planning Framework identifies Sligo for significant levels of growth in order that it can achieve its potential.

Sligo is home to two third level education facilities, Sligo Institute of Technology and St. Angela's College (with an estimated term time student number at 7,500) as well as a variety of high quality primary and secondary schools which are an attractive proposition for people and families considering coming to the area. In addition to this Sligo has a strong and successful retail core with a mixture of diverse and eclectic independent retailers and traders interspersed with nationally recognisable brands. The town centre is compact, pedestrian friendly and walkable which are the fundamentals of a successful town centre. While there are vacancies these units can serve as the location for future growth on the back of wider population and employment growth. In addition to a strong retail core, the town has appropriately located retail parks to facilitate larger scale retailers and bulky goods retailers. There is capacity in these parks to accommodate future growth.

While Sligo has a substantial and growing population and the capacity to expand significantly in terms of employment and population numbers, it also offers the appeal of an attractive historic town centre and easy access to the open countryside, beach resorts at Rosses Point and Strandhill as well as many other cultural and heritage destinations. The town offers the best of city and country and is therefore an attractive proposition for both young professionals and families. In addition to the points above the cost of living in Sligo is considerably lower than in the other regional centres and particularly in the context of Dublin. Rents and house prices are affordable in contrast to Dublin and some of the other city settlements. The cost of doing business is also lower than the other city settlements with rates and commercial rents which are affordable.

It is fostering a sense of place that makes a settlement successful and attractive to existing residents as well as newcomers. Sligo is striving to create a sense of place and enhance the offer and attractiveness of the town centre. This is evidenced in the fact that Sligo is the only town in Ireland with a Business Improvement District and a Purple Flag. A Purple Flag is an award for excellence in the evening and night time economy. There is also significant potential to further develop Sligo as a tourism destination given that it is located on the section of the Wild Atlantic Way which is closest to Dublin. Provided that good quality linkages and infrastructure can be developed between Sligo and Dublin in the near future (the completion of the M4) then Sligo could become the principal stop off point for people travelling north or south on the Wild Atlantic Way.

On the basis of the above and the strong and obvious case that exists, we respectfully request that Sligo is identified as a growth centre commensurate with its status as the capital of the North West. As demonstrated above in Section 5.3.1, Sligo has all the

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<sup>19</sup> Sligo and Environs Development Plan 2010-2016

characteristics of a city and competes as a city. This submission requests that the key position of Sligo is addressed in the NPF in terms of its role as a key city in the Region (Sligo City Region) to facilitate the future growth, success and sustainability of the town.

## **7.2 What should the NPF achieve?**

The adopted National Planning Framework should identify Sligo as a key city in the region and on foot of this designation must direct significant infrastructure investment to the town. This infrastructure investment will facilitate and lay the foundation for growth in population and employment. This investment should be targeted at ensuring Sligo has better connectivity with Dublin and the other city regions.

The National Planning Framework should also be given a statutory basis so that the next Regional Spatial and Economic Strategies (RSEs), Sligo County Development Plan and all Local Area Plans are obliged to accord with its provisions. This in turn will ensure that development management decisions at local level, both in Sligo and across the country, are made in accordance with the provisions of the Framework and not contrary to it which is one of the reasons why the previous spatial strategy failed. In addition to the above, all future government plans and strategies should take cognisance of the provisions of the NPF to facilitate a 'joined up approach'. This will help to ensure that investment is directed to the right areas and that the mechanisms of government are all pulling in the right direction to ensure a prosperous and sustainable future for Sligo and for the rest of the country.

## **7.3 Implementation of the NPF**

The objectives of the NPF will be applied on a regional basis through statutory Regional Spatial and Economic Strategies (RSEs). These are new plans that will address more detail at a regional scale, being prepared by each of the three Regional Assemblies that were established in 2014. The North Western Regional Assembly in their submission on the '*National Planning Framework: Issues and Choices Paper*', has identified the three City Regions of Galway, Sligo and Letterkenny-Derry/Strabane as key development areas for future population growth, supported through a network of significant towns, villages and rural catchments. It is proposed that the designation of these three key urban centres as City's or City Region's, will reinforce the Atlantic Economic Corridor (AEC) model, as being comprised of a network of major urban Regional Centres which encompass the length of the Western Seaboard. Furthermore, it incorporates the crucial element to enable effective regional development, with at least two designated centres north of the Dublin – Galway axis.



**Figure 3: The Urban Hierarchy in the North West (extracted from the NWRA submission on the NPF issues and choices paper)**

While the NPF can set out an overarching strategy and associated policies and objectives it is ultimately the regional and local development plans which will determine outcomes on the ground. The structure and implementation of local and regional development plan policies and objectives must not be permitted to run contrary to the overall strategy set out in the NPF. Similarly, the zoning designations associated with these development plans and the decisions on individual planning applications must, first and foremost, accord with the provisions of the NPF. This will facilitate a shift from developer-led planning to plan-led planning. The primacy of the NPF, in the planning hierarchy, should be enshrined both legislatively and practically to prevent development management outcomes that run contrary to the NPF and which will only serve to undermine it. Sligo BID encourage the Department of Housing, Planning and Local Government to work cohesively the North West Regional Assembly,

to create consistent plans and bridge the gap between the vision of the NWRA and the strategies outlined in the Draft NPF.