



07 August 2025

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

Dear Sir/Madam

**Re: Sligo Town and Environs Urban Area Plan Issues Paper**

The Heritage Council was established in 1995 as a statutory body under the Heritage Act 1995 with a Council (the Board of the body) appointed by the Minister. The Heritage Council is a prescribed body under the provisions of the Planning and Development Acts 2000-2010 and S.I. No. 600/2001 of the Planning and Development Regulations, section 28 inter alia, in accordance with its functions under Section 6 of the Heritage Act, 1995. We seek to provide submissions on forward planning, development management and strategic infrastructure developments as they relate to Ireland's heritage, namely built, cultural and natural heritage.

**National Planning Policy Context**

It is important to state from the outset that the **National Planning Framework April 2025** identifies "Enhanced Amenity and Heritage" as one of our national strategic outcomes. Within this, the NPF correctly notes that built, cultural and natural heritage has intrinsic value in defining the character of urban and rural areas, adding to their attractiveness and sense of place. There are several national policy objectives in the NPF 2025 that cover landscape, cultural and natural heritage.

The 4<sup>th</sup> edition of Ireland's **National Biodiversity Action Plan (NBAP) 2023 – 2030** was published in January 2024. The NBAP states that "local authorities play a key role in biodiversity conservation through the planning system". There are several targets identified under Outcome 2A (*The protection of existing designated areas and protected species is strengthened and conservation and restoration within the existing protected area network are enhanced, regarding designated areas and protected species*) that are relevant for local authorities in their plan making functions. However, of key importance is Outcome 3C (*Planning and development will facilitate and secure biodiversity's contributions to People*). Action Numbers 3C2 and 3C3 are especially important, whereby the objectives of the NBAP are to be aligned and integrated within the statutory land use plans. In addition, actions 1B9, 1C5 should also be key considerations for all plans.

**Heritage Ireland 2030** was published in February 2022 and details a number of action points relevant for local authorities, and these should be included in local area plans. Most importantly are Action 22 - *Introduce policies on supports for urban biodiversity and tree planting*; Action 26 - *Support nature-based solutions for land-use management*; and Action 37 - *Integrate heritage*

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*considerations into urban and rural regeneration to ensure that built and natural heritage objectives underpin the planning and development process and inform the 'Town Centres First' policy approach.*

The **Guidelines for Planning Authorities on Architectural Heritage Protection** were developed in 2004 and give expression to the provisions of the Planning and Development Act 2000, with regards to built heritage. Chapter 2 and 3 give detailed guidance on the role of statutory county level plans with regards to the Record of Protected Structures and Architectural Conservation Areas. The Office of the Planning Regulator has also provided guidance on **Archaeology in the Planning Process** through **Planning Leaflet 13**.

The **Sligo County Development Plan 2024-2030** has recently come into effect. Chapter 24 contains a comprehensive number of policies on biodiversity ranging from protected sites to biodiversity more generally. While Chapter 25 deals with built heritage matters including archaeological and architectural heritage.

### General Comment

The Heritage Council welcome the publication of the Issues Paper for the Sligo Town and Environs Urban Area Plan (UAP). The Heritage Council has reviewed the Issues Paper and the associated questions in each section. We have sought to respond to such questions were pertinent.

Firstly, it is important to state that the Heritage Council recognises the important role of Sligo in terms of the need to establish balanced regional development within the geographic context of the Northwest. This is reflected in the provisions for Sligo in the National Planning Framework 2025.

Secondly, at the fundamentals of first principles, proper planning and sustainable development should be based on the premise of a consolidated growth pattern that integrates land use and transport, while simultaneously avoiding the most environmentally sensitive sites for development. Within this context, we support the compact growth of Sligo. We note the emphasis on rejuvenation and renewal in the NPF's aspirations for the town, as well as the general regeneration of the built fabric within the context of compact growth. At the same time, we believe that heritage led regeneration is essential to such rejuvenation and renewal.

We would therefore recommend that any vision for the UAP capture the importance of balancing future development with the protection of the town's natural and built heritage. We recommend that there be a heritage emphasis in the new plan. Protecting this heritage, which cannot be replicated and recreated, along with ensuring compact growth, need not necessarily be conflicting objectives but can be achieved through a heritage led design approach that should be part of the vision for Sligo Town and its hinterland.

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### Climate Action

*How can Sligo Town become a 'low carbon town'?*

*What specific climate mitigation and adaptation measures should be incorporated in the Urban Area Plan?*

*Do you think there are other environmental issues facing Sligo Town? How can the UAP address these issues?*

*How can the UAP achieve a balance between the growth of Sligo Town and Environs and the protection of the environment?*

Increasing greenhouse gas emissions and the loss of carbon sinks, as well as negative impacts on heritage, can result from poor and inefficient land use planning. To remedy this, achieving more consolidated growth will reduce greenhouse gas emissions from the built environment, but it will also ensure that land take is restrained and does not pose undue threats to cultural and natural heritage. In this regard, the Heritage Council strongly support the concept of compact growth, associated brownfield site identification and land activation, and the re-use of buildings, both designated and non-designated, to meet development needs.

Whilst we recognise that it is unlikely that all the housing and development needs of a local authority would be met on brownfield sites only, we do encourage forward plans to exhaust the potential for brownfield site locations before any greenfield expansion is pursued. Sequentially, it is then essential to ensure that any greenfield release makes efficient use of land, whilst providing the mix of homes necessary, and having densities and facilities, that are conducive to public transport roll out, and cycling and walking.

Optimising land use in an efficient manner, reduces the built environment's footprint which also has benefits for climate action and biodiversity. The Heritage Council are very conscious that climate change is a heritage issue. Several species and habitats are under pressure from climate change, and therefore we support both climate mitigation and adaptation policies in statutory forward plans.

In overarching terms, we encourage the UAP to achieve the following, through both strategic objectives, policies, and associated mapping/zoning:

- Ensure that transport and land use patterns are strongly integrated, and our settlement patterns are conducive to non-car based transport. Within this context, the identification of land for housing and employment, and other uses should be directed towards existing or future planned transport infrastructure, or in sustainable locations next to existing services and amenities. This is relevant for both multi-house development and single dwellings.
- Avoid sites that have high ecological potential. The identification of sites for development should be based on an environmental constraints analysis with the least sensitive sites preferred.
- A strategic objective for re-use of heritage buildings, and heritage led regeneration and placemaking, as well as conservation through use.
- Increased efforts at pedestrianisation and discourage car dominated streetscapes.

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### Placemaking and Regeneration

*In your opinion, what regeneration works or projects could be transformative for Sligo?*

*In addition to the sites described here, are there any other places in town where you think significant urban design interventions are required?*

*What areas in Sligo Town should be repurposed for pedestrians only?*

*What kind of measures could the UAP include to reduce commercial vacancy in the town centre?*

*Is there a particular location (or more) which the Council should prioritise in terms of tackling dereliction?*

There are certainly vacancy issues in Sligo, and certain strategic projects can act as a catalyst for improvement. The town's natural and built heritage can be the anchor of which positive placemaking and civic life can pivot. Sligo benefits from an exceptional natural amenity, the Garvoge River, which is part of the heritage of the town and contributes significantly to Sligo's definition of place. People's interaction with the riverfront should be a key consideration for placemaking and urban design proposals. There is a unique opportunity to design the riverfront as a place to be, where civic life can be fostered. The southern riverfront, from Hyde Bridge to JFK Parade, has significant potential for improvement, based on active travel, civic life, and a soft landscaping solution. Consideration could be given to repurposing this area for people, rather than car movement and parking. This is particularly important as there is no central park/square in the town centre.

There appears to be some well-considered proposals and aspirations for certain parts of the town in the Issues Paper. The Heritage Council would offer some general advice on what areas/places could benefit from further interventions.

In this context, it is important to note that the Irish town characteristically emerged in a sequence of historical stages between the thirteenth century and the present. The survival of these historic stages is generally recognisable and plays an important part in the visual and historic heritage of most towns. The linear or axial Irish townscape is a key feature of our national built heritage, typically characterised by a formal linear street layout, public spaces, key junctions, and streetscapes. It is then, regarding how these components are arranged, that the uniqueness of this townscape emerges.

In the past, spaces between buildings would have been designed with civic life in mind. Therefore, key junctions and landmark buildings could offer a location for successful interventions, even if relatively minor in scale. The key principle is to amplify the setting of historic buildings, whose character and prominence can define place. As such, the triangle junction of Old Market Street, and Teelings Street, benefits from several such buildings including the Courthouse, Murrow House,

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The Garda Station, as well as several other buildings (all listed on the National Inventory of Architectural Heritage). This junction would benefit from a soft landscaping/public realm improvement.

Aside from more specific projects and interventions, the Heritage Council strongly believe that wider planning decisions determine the health of town centres such as Sligo. As alluded to earlier, consolidated growth and a sequential approach to development based on town centre first policies is needed.

Additionally, the Heritage Council do have concerns that other planning considerations may be compromising more important strategic planning objectives. There is a need that quantitative development management standards are not applied bluntly to heritage buildings both designated and non-designated, or indeed brownfield sites in inner urban cores. This relates to parking standards, privacy distances, neighbouring amenity considerations etc for both commercial and residential development.

### Sustainable Communities

*Should the UAP make provision for tall buildings (seven storeys or more) in Sligo Town in the pursuit of higher densities? If so, where? If not, why?*

For the reasons stated above the Heritage Council support consolidated and compact growth. The basis of a sound planning system is the optimisation and efficient use of land to ensure it is not unnecessarily expansionist. However, there is a need to ensure that there is not a misguided conflation between high density and high buildings in terms of achieving compact growth. High density compact growth does not necessarily mean high buildings. The latter inevitably has significant impacts on the heritage of historic townscapes. Relatively high density can be achieved by high site coverage, rather than by building height. This includes the development of townscape/perimeter blocks, rather than single landmark buildings. The former is also more conducive to providing housing needs in terms of the necessary mix of homes.

### Outdoor Recreation

*In addition to those listed here, do you think there are other natural features or routes that could be developed as walkways or green corridors?*

The Heritage Council supports outdoor recreation that promotes people's engagement with heritage i.e. seashore, mountain, lakeshore, riverbank, monument or other place of natural beauty. Outdoor recreation brings people closer to nature and culture, which is important, yet every trail, signpost and parking space has the potential to erode the very heritage that attracts visitors.

In general terms, some recreational infrastructure can be ill conceived and overly rely on hard engineering, rather than softer landscaped solutions. A universal access path in an urban

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environment will require a very different approach to the maintenance of waymarked trail in an upland environment or a riverside walk. Such trail and route design should be informed by the environmental context.

Therefore, whilst active travel and engagement with heritage and nature is supported by the Heritage Council, there is a need to protect the very biodiversity or heritage feature that people engage with while partaking in recreation and leisure. Therefore, we would emphasise that while such plans as this can have regard to non-statutory outdoor recreation plans or manuals for active travel infrastructure, this does not negate the need to comply with county development plan or urban area plan policies on biodiversity or cultural heritage.

### Heritage

*How can the Local Authority support and encourage property owners to preserve and maintain their historic buildings, to help improve the overall appearance of Sligo Town?*

*Are there any historic features in Sligo that currently do not have formal protection, but you believe should be conserved and enhanced?*

The Heritage Council welcome proposals that bring uses back to historic buildings. We are growing increasingly concerned regarding vacancy and dereliction in Irish towns, villages and cities. This unfortunate trend has been, and continues to be, a major threat to the country's built heritage. To encourage adaptive reuse, a hospitable planning environment is needed. The primary consideration for planning proposals to historic buildings is if the works to ensure continued use are reasonable, and do not result in excessive negative impacts on the building's fabric. For residential development it is important to ensure that adequate space and fire safety standards are met, however, other development management standards, as noted previously, such as car parking and opening hours/amenity etc, need to be applied flexibly. A policy on the flexible implementation of development management standards is needed for the plan, that allows for departures from such standards on a case-by-case basis. This is particularly important for landmark historic buildings, whose contribution to the streetscape goes beyond their site boundary.

In general terms, the Heritage Council would recommend a fresh 'walk about town' to identify any non-designated features/structures which may merit protection. We would also include existing trees in this, as we believe that the Tree Preservation Order (TPO) provision is underutilised in forward plans. As an example, some of the mature trees along the riverfront may merit TPO status.

How the UAP provides for the protection of 'The Passage Tomb Landscape of County Sligo' which has been recently added to Ireland's World Heritage Tentative List, is pivotal. The most relevant monuments in this landscape that may be impacted by the future growth and development of Sligo, have been identified in the Issues Paper. In this regard, we note that the intention is for the plan to include specific objectives to protect this exceptional cultural landscape.

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When drafting objectives, it is essential to consider the Justification of Outstanding Universal Value (OUV) for the tentative World Heritage Property (WHP). An understanding of how to assess impact on OUV, the methodology for which is a Heritage Impact Assessment, would be particularly useful for drafting such policies. The statement of Justification of OUV and the statements of authenticity and/or integrity are available [here](#), and we would encourage Sligo County Council to review this to identify the constituent attributes which define it. As an example, the characteristics for this tentative WHP, is that the megalithic tombs are “*intensely interconnected*”, with “*undisturbed cairns*”, which the OUV also describes as an “*intense dialogue*” between “*monuments and landscape*”. Therefore, the attributes of ‘landscape’, ‘interconnections’, ‘cairns/monuments’, would be key for understanding impacts, and policy drafting.

Accordingly, it is essential that development to the south of Sligo town is managed with great care, particularly in relation to the setting of the monuments and the “*dynamic interaction*” between them. Any disruption of this interaction is likely to result in significant negative impacts on what is considered the “most westerly and dramatic expressions of a remarkable flourishing of the construction of ritual monuments across Europe between five and six millennia ago”.

*From your experience, which are the most threatened natural heritage features in the Sligo and Environs area?*

*What planning measures should the UAP put in place to support biodiversity within the Town’s built-up area?*

*How should we safeguard and enhance natural heritage in the Plan area as the population of Sligo Town continues to grow?*

The plan limit boundary includes Sligo’s immediate environs, which is important. This therefore includes a range of biodiversity sites, habitats and ecosystems of varying importance. This includes Cummeen Strand SPA, Cummeen Strand/Drumcliff bay (Sligo Bay) SAC/pNHA; Lough Gill SAC/pNHA. Outside of this protected network there are many other sites of local biodiversity importance. These include woodland in Carns and Hazelwood Demense townlands, with further small stands of trees also evident around and in the town. There are also several wetlands located within the plan boundary particularly to the southwest, which were identified in the Sligo Wetland Survey. These can be viewed [here](#). It is essential that such sites are avoided in terms of development. In addition, there are many linear ecological features including watercourses and hedgerows which should be considered for retention as part of the design of development proposals.

Policies should be provided to account for the protection of natural features. There is often needless removal of natural features as part of the construction phase of works. Such natural features are a ready-made landscaping solution and are often easily accommodated as part of the green and open space requirements of schemes, without necessarily compromising the development. Furthermore, Inland Fisheries Guidance should be included UAP i.e. Planning for Watercourses in the Urban Environment”.

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Conclusion

We welcome the preparation of the Sligo Town and Environs Urban Area Plan. We highlight the importance of heritage not just at an individual policy level but at the strategic level for the future development and land use planning of the town and its environs. This should be recognised in the plan to ensure that development requirements be achieved in a manner that protects and enhances heritage and the environment.

We trust these recommendations will be considered as the local authority pursues this much needed Urban Area Plan.

Yours sincerely

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**Virginia Teehan**

**Chief Executive Officer**

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