



Sligo CTCHC Project

Submission on the emerging Sligo County Development Plan 2023-2029

'Town Centres First!'

Sligo CTCHC Project's submission is set out below under the following headings:


- A. Support the delivery of the UN Sustainable Development Goals (Un SDGs), National Planning Framework and Regional Spatial and Economic Strategies (RSES);**
- B. Focus on Town Centres and Building Renewal;**
- C. Target the location of Strategic Housing Developments (SHDs) and Investment in Building Stock;**
- D. Harness Geo-spatial Data Gathering/Mapping, Communications and Public Engagement; and**
- E. Enhance Biodiversity & wider Ecosystem Services.**

A: Key Priorities to support the delivery of UN SDGs, the National Planning Framework (NPF) and Regional Spatial and Economic Strategies (RSES):

1. Ensure the UN Sustainable Development Goals (SDGs) are at the heart of the new county development plan in order to acknowledge and appropriately respond to Dáil Éireann's declared National Emergency on Climate Change & Biodiversity Loss¹ in May 2019 and the *Climate Action and Low Carbon Development (Amendment) Act 2021*;
2. In accordance with the UNECE Aarhus Convention, the EC's Urban Agenda and the European Landscape Convention (ELC), formulate and deliver a policy in accordance with the Programme for Government's emerging *Town Centre First Policy* for the designated key towns and villages within the council's administrative area, e.g. formulate a robust policy for the towns and villages in the county-at-large including the county town and the necklace of towns/villages along the coast of County Sligo in partnership with the CTCHC Programme, Heritage Council, NWRA and others;
3. Embrace the key tenets of the Programme for Government (PfG), which was published in June 2020, including the need for a national policy focusing on Town Centres First (TCF) championed by the CTCHC Programme since 2019, the enhancement of the built heritage in towns and villages, and the reuse and repurposing of vacant buildings in historic town centres. The Programme for Government states the following:

1

https://data.oireachtas.ie/ie/oireachtas/committee/dail/32/joint_committee_on_climate_action/reports/2019/2019-03-28_report-climate-change-a-cross-party-consensus-for-action_en.pdf

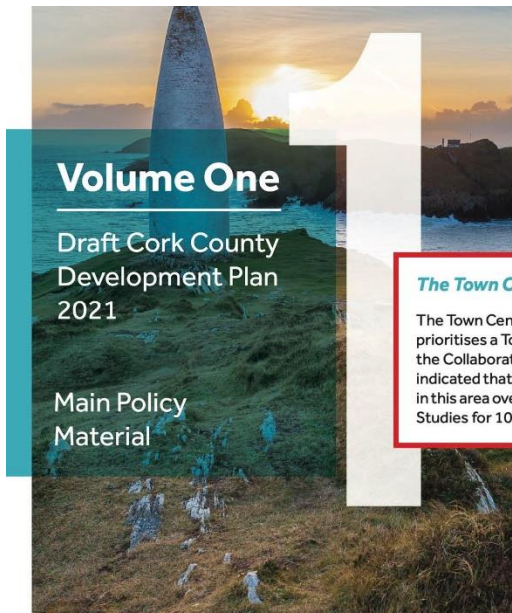


Programme for Government (PfG) – ‘Town Centres First’:

“...We will prioritise a Town Centres First collaborative and strategic approach to regeneration of our villages and towns, using the CTCHC framework to gather data and lead actions...”

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4. The new county development plan must set specific targets in relation to vacancy rates in historic town centres throughout the county in line with national climate change and housing strategies and targets, e.g. the Sligo CTCHC Report 2020² highlighted that the commercial vacancy rate in Sligo Town Centre is 18.4% - well above the accepted normal range of vacancy rate in Europe which is 5-11% max;
5. A specific policy should be included to support Collaborative Town Centre Health Checks – an example of policy from the emerging Cork County Development Plan 2021 is provided below:



9.2 The Town Centre First Approach

9.2.1 The Town Centre First approach recognises town centres' role at the core of community and economic life. The approach prioritises a Town Centres First collaborative and strategic approach to the regeneration of our villages and towns, using the Collaborative Town Centre Health Check (CTCHC) framework to gather data and lead actions. The Government has indicated that it is committed to this approach and it is anticipated that further policy at a national level will be developed in this area over the lifetime of the Plan. Cork County Council already has the benefit of the preparation of Urban Capacity Studies for 10 of our towns which is an important start in developing a future vision for our town centres.

9.2.2 At its simplest the principle is that the public sector put the health of town centres at the heart of proportionate and best value decision making; that it adopts a collaborative approach which supports a longer-term vision and plan for each town centre.

9.2.3 This will mean that, where practical and beneficial, public services like education, health and government offices should be located in town centres, adding to the overall mix of facilities, amenities and activities which are on offer and attracting in different types of footfall. The principle therefore focuses considerations around the potential impacts of relocating public services to a town centre's long-term health and vitality. It is about open, measured and transparent decision making that takes account of medium to longer-term impacts on town centres. It also recognises that town centre locations are not always suitable, but regards that the rationale for locating elsewhere is evidenced and transparent.

9.2.4 Locating Public Services in Town Centres Offers a Number of Benefits Because it:

The Town Centre First Approach

The Town Centre first approach recognises town centres' role at the core of community and economic life. The approach prioritises a Town Centres First collaborative and strategic approach to the regeneration of our villages and towns, using the Collaborative Town Centre Health Check (CTCHC) framework to gather data and lead actions. The Government has indicated that it is committed to this approach and it is anticipated that further policy at a national level will be developed in this area over the lifetime of the Plan. Cork County Council already has the benefit of the preparation of Urban Capacity Studies for 10 of our towns which is an important start in developing a future vision for our town centres.

9.2.5 For people to want to live in towns there needs to be a vision of towns as high quality, inclusive places for people of all ages and abilities particularly children and families. A town centre which is attractive to children will be a successful place for all. Good public realm and street design, green infrastructure and public amenities that support people of all ages and abilities are a vital part of re-imagining our towns for contemporary needs. Creating inclusive, healthy places can aid well-being and mitigate negative effects of loneliness and isolation. (See also Chapter 5, Settlements and Place-making, Chapter 14 Green Infrastructure and Recreation and Chapter 15 Biodiversity and Environment)

9.2.6 Work patterns have also changed and towns offer a unique potential to accommodate innovation hubs and remote working and co-working models. In imagining towns as places that foster employment, small business and innovation, they can again become attractive places to younger generations. Our towns have the potential to be working environments that are at the forefront of the digital revolution. (See also Chapter 8 Economic Development)

² <https://www.heritagecouncil.ie/content/files/Sligo-Collaborative-Town-Centre-Health-Check.pdf>

6. Establish sustainable key environmental and cultural heritage indicators, e.g. vacancy levels, and monitoring processes through Strategic Environmental Assessment (SEA) to ensure that a county-wide Town Centre First Policy (TCF) is actually working – this should aim to map derelict buildings that are missing from the register including rural catchments;
7. It is recommended that the local authority and its partners could involve ‘international peer reviewers’ on town centre matters and network within the CTCHC Programme to ensure that this recommended monitoring takes place;
8. Ensure that the planned regeneration quarter in Sligo Town, to be funded from the URDF between Connaughton Road and the river, successfully provides a vibrant resource that will provide learning and meeting opportunities for the whole community, generate creative ideas, showcase both heritage and new inventions, and provide a magnet for visitors to Sligo;
9. Ensure that the Sligo County Heritage Plan and Sligo County Biodiversity Plan is updated to support the county development plan’s heritage objectives and to achieve stated government policy as set out in the National Heritage Plan 2002 and the National Biodiversity Action Plan 2017-2021³ a key action under *Heritage Ireland 2030* – the Sligo CTCHC Project Team notes and supports the recent progress on GCC’s plan, which we hope to participate in, both in content and actions;
10. Ensure all aspects of the strategic management of the marine spatial planning unit is implemented in line with the LIMA Action Plan;
11. Assess the impact of Climate Change on current heritage and future development in the county – potential development land within the administrative area may have to be reassessed to facilitate expected sea level rise and inform proposed flood relief schemes – this would not preclude uses such as greenways or similar – any assessment should include opportunities for green-ecosystem services;

B: Focus on Town Centres and Building Renewal:

12. Planning policy needs to reflect the embodied carbon in existing building structures and fittings and establish a ‘Carbon Accountancy’ for development proposals to ensure that existing buildings are not needlessly demolished to be replaced by new buildings of equivalent or lesser spatial characteristics. This includes recognising the contribution that buildings, which are not now perceived to be part of the architectural heritage, have a contribution to make to public goods;
13. Planning policy needs to move towards a 3D approach (GeoBIM and/or BIM including digital town twinning) to the planning and management of historic townscapes, streets, buildings and multi-use occupancy, which makes a town liveable, intense and varied. In particular, housing policy needs to promote mixed housing forms, and move away from large-scale developments for highly-defined market segments. For example, it is advisable that the need for new housing should protect and enhance the historic scale and grain of the county towns;
14. Sligo County Council’s Heritage Office has highlighted the positive contribution that many twentieth century buildings have made to the county-at-large. The protection of exemplary and pivotal modern buildings as part of the architectural heritage should be actively considered in the review of the Record of Protected Structures for this Development Plan;

³ National Biodiversity Action Plan | 2017-2021, DCH&G, NPWS, 2017.

15. Urgent consideration should be given to the provision of a One-Stop Shop⁴ service for the owners of buildings to harmonise the Local Authority's diverse functions including Building Control, Planning, Fire and Architectural/building Conservation. This service should be developed in partnership with Sligo BID and IT Sligo, etc. Such provision would facilitate the adaptive re-use of existing buildings, offset construction industry (extraction, construction and demolition) carbon emissions and make for more liveable towns and villages within the county-at-large;
16. Include specific policy to support the *Collaborative Town Centre Health Check Programme* for key settlements following the award-winning programme methodology i.e. the 15-Step CTCHC process for Phase 1. Please see Tralee and Letterkenny CTCHCs - both towns are recipients of the Bank of Ireland's National Most Enterprising Town in Ireland Award in 2017 and 2018;
17. Undertake *Collaborative Town Centre Health Checks (CTCHC)* for Sligo Town every two years and throughout the plan period – create a bi-annual, online monitoring system in partnership with Sligo Business Improvement District (BID), Sligo Chamber, civic groups/leaders, etc;
18. 'Pilot' a *Conservation Area Regeneration Scheme (CARS)* in partnership with the CTCHC Programme - see Scotland's CARSs and City Heritage Trusts;
19. 'Pilot' a Heritage Action Zone (HAZ) in a historic town centre within the county in partnership with the Department of Housing and other stakeholders;
20. Formulate and deliver a *County Sligo Town Centres and Buildings Renewal Plan*, as part of the CTCHC Programme soon as possible, working in partnership with the Partners, the NW Regional Assembly and the Department of Housing, Planning and Local Government. This plan should also promote historic towns centres as Strategic Energy Zones (SEZs);
21. Work with IT Sligo, Sligo BID and the CTCHC Programme to identify and develop a vibrant Student Quarter in Sligo Town Centre;
22. The county development plan should promote the reuse of traditional and landmark buildings in historic town centres as digital hubs, in line with government policy, i.e. focus on heritage-led regeneration; and
23. The emerging county development plan should support an audit of embodied carbon in existing buildings in historic town and village centres within the plan area – this audit could link to the ongoing work of the CTCHC Programme and the proposed Towns and Buildings Renewal Plan⁵ - see above.

C: Target the location of Strategic Housing Developments (SHDs to become LCRD) and Investment in Building Stock:

24. Ensure that all Strategic Housing Development (SHD) and large-scale residential development (LSRD) proposals are within or adjacent to town centres and are close to public transport hubs. Undertake full review of existing opportunity sites in town centres, as part of a much-needed switch to a Town Centre First Policy in line with government policy as set out in the Programme for Government (2020);

⁴ https://www.dublincity.ie/sites/default/files/media/file-uploads/2018-05/19618_DCCo_Living_City_Grant_InitiativeV10_2_.pdf- see page 4 for reference to DCC's One-Stop Shop Advisory Team.

⁵ https://www.buildup.eu/sites/default/files/content/worldgbc_bringing_embodied_carbon_upfront.pdf

25. In line with EC policy, formulate a *Town Centre Living Strategy* as soon as possible in partnership with the European Investment Bank (EIB), NWRA and other private investment and social enterprise partners;
26. Prepare a sustainable regeneration plan for publicly-owned land banks - focus on town centre sites, in line with recommended Town Centre First Policy (see above) – liaise with the Land Development Agency (LDA) in this regard;
27. Develop robust *Enabling Policy* and *Streetscape Design Guidelines* to support infill development in town centres and urban villages;
28. Formulate and deliver a *Strategic Development Plan* to Support Sligo BID – highlighting the need for National and Regional Strategies for the development of BID Companies in Ireland e.g. Scotland has 40 no. BID companies and Ireland currently has four town centre BIDs, including the recently established Drogheda BID;
29. Undertake *Riverscape Studies* in partnership with the NPWS and strengthen existing greenways and blueways, etc;
30. Undertake Noise and Air Quality/Pollution Mapping for key towns in order to inform strategies for enhancing and encouraging town centre living;
31. Establish a priority Greenway linking town and village centres to the main railway and bus stations and establish a Heritage Loop walk in town centre environs;
32. Sligo County Council should audit their land banks, giving particular consideration to opportunities for all ecosystem service provision, this can be as basic as applying less chemical herbicides to roadway management and / or facilitating more natural vegetation to establish for pollinators;
33. The larger urban villages in the county-at-large should be enhanced by a range of biodiversity key species, which can play a significant role in enriching the users/consumers' experience – a softening of a rich built environment by means of pocket parks, orchards, pollinators, and swift box enhancement etc can all go a long way to enhance the urban fabric as well as functioning as an ecosystem service; and
34. We recommend that SCC prepares for full implementation of Marine Protected Areas, both within the current list of designated Natura 2000 sites, proposed Natural Heritage Areas and Refuges for Fauna, but also seek to protect other significant biologically diverse areas such as deep-water reefs and shipwrecks that act as fish nurseries.

D: Harness Geo-spatial Data Gathering/Mapping, Communications and Public Engagement:

35. Sligo County Council should seek to ensure that all data, which is geospatial in nature is processed, so as to maintain and preserve its original meta data i.e. therefore it may be queried, sorted and displayed accordingly in accordance with the key tenets of the UNECE Aarhus Convention;
36. Progress a single source of geospatial truth for the whole of the county including its settlements. All public authority information needs to be further supplemented and enhanced to provide the appropriate level of detail. The *Planning and Development Regulations, 2001*, clearly specify:

Site or layout plans shall be drawn to a scale of not less than 1:500 (which shall be indicated thereon), the site boundary shall be clearly delineated in red, and buildings, roads, boundaries, septic tanks and percolation areas, bored wells, significant tree stands and other features on, adjoining or in the vicinity of the land or structure to which the application relates shall be shown, land which adjoins, abuts or is adjacent

to the land to be developed and which is under the control of the applicant or the person who owns the land which is the subject of the application shall be outlined in blue and wayleaves shall be shown in yellow; and

Other plans, elevations and sections shall be drawn to a scale of not less than 1:200 (which shall be indicated thereon), or such other scale as may be agreed with the planning authority prior to the submission of the application in any particular case;

It is important that our public planning system is advanced to incorporate this detail and make full use of it in order to create public value.

37. Establish an open data source project similar to *Colouring London*⁶ to engage the public and the Irish Diaspora in the management of traditional buildings in the historic core of town centres and other historic settlements within the county at large; and
38. The Sligo CTCHC Project Team recommends that a detailed *Public Communications Strategy* is formulated to ensure that the county development plan is successfully monitored and delivered.

E: Enhance Biodiversity & wider Ecosystem Services:

39. Sligo's rich and varied biodiversity resource is well acknowledged and is the engine to many agricultural, industrial and tourism-focused activities throughout the county. This unique natural resource does not exist purely within defined National & International designations and proper planning will ensure development will recognise the natural environment and seek to 'do no harm' as a first principle in the wider context of planning;
40. In line with stated policy in the Programme for Government, the Sligo CTCHC Project Team would wish to see the establishment of a dedicated Biodiversity Officer to both inform and assist appropriate decision making in regard to high level planning and projects;
41. As a response to the stated Biodiversity emergency, the Sligo CTCHC Project Team would like to see Sligo County Council take a lead and make a stated commitment to the new All Ireland Pollinator Plan (2021-2025);
42. New developments/system processes are to be delivered in regard to Marine Planning, the emerging Sligo County Development Plan should firstly, recognise this fact and seek to ensure policies are able to facilitate a range of new engagements and in particular new Marine Protected Areas (MPAs) – these new MPAs need not, with appropriate engagement with coastal communities, be an additional burden and may, if well designed, assist with the future sustainable fishing industry for generations to come; and
43. Finally, Sligo County Council in line with the stated Climate Emergency, should seek to lead by example and ensure "Peat-free" soils/enrichments with all county council parks and village/town enhancement works, by 2025 at the latest.

Submitted on behalf of the Sligo CTCHC Project

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⁶ <https://colouringlondon.org/>