

# **First Chief Executive's Report**

on submissions and observations  
received in relation to the

## **Draft Enniscrone Local Area Plan 2014-2020**

27 June 2014

**Sligo County Council**  
**Development**  
**PlanningUnit**



## Introduction

Section 19(1)(c) of the Planning and Development Act 2000 (as amended) requires that an existing local area plan (LAP) be amended (or revoked) at least every six years after the making of the previous plan. The procedure for amending (or revoking) a LAP – which is the same as for making a LAP – is set out in Section 20 of the Planning and Development Act 2000 (as amended).

Although consultation on the review of Enniscrone LAP 2004-2013 took place in 2012 and 2013, Sligo County Council did not commence the formal review of the LAP until 2014.

Following pre-draft consultation in January 2014, a Draft LAP was prepared and placed on public display from 24 April to 6 June 2014.

In total, thirteen submissions were received in response to the invitation to comment on the Draft LAP. The persons and organisations that made these submissions are listed below.

### List of persons and organisations that made submissions on the Draft Enniscrone LAP

| Ref. no. | Date received | Name or agency                                                                            | On behalf of (where applicable) | Address                                                                                      |
|----------|---------------|-------------------------------------------------------------------------------------------|---------------------------------|----------------------------------------------------------------------------------------------|
| 1        | 14/05/2014    | Miriam Hannan                                                                             |                                 | e-mail                                                                                       |
| 2        | 14/05/2014    | Cian O'Mahony, Scientific Officer                                                         | Environmental Assessment Agency | SEA Section, Office of Environmental Assessment, Regional Inspectorate, Inniscarra, Co. Cork |
| 3        | 28/05/2014    | Olivia Morgan                                                                             | National Roads Authority        | St. Martins House, Waterloo Road, Dublin 4                                                   |
| 4        | 29/05/2014    | Anthony Reape, Armstrong Reape Architectural Services                                     | Patrick Kilcullen               | Charter House, Linenhall Street, Castlebar, Co. Mayo                                         |
| 5        | 03/06/2014    | Anthony Reape, Armstrong Reape Architectural Services                                     | Tommy and Renee Foody           | Charter House, Linenhall Street, Castlebar, Co. Mayo                                         |
| 6        | 04/06/2014    | Kathleen Gilroy                                                                           |                                 | Carrowhubbock South, Enniscrone, Co. Sligo                                                   |
| 7        | 04/06/2014    | Dr. Michael Gilroy                                                                        |                                 | Carrowhubbock South, Enniscrone, Co. Sligo                                                   |
| 8        | 05/06/2014    | Anthony Reape, Armstrong Reape Architectural Services                                     | Tony Carrabine                  | Charter House, Linenhall Street, Castlebar, Co. Mayo                                         |
| 9        | 05/06/2014    | Mary Brady, Corporate Support Unit, Dept. of Communications, Energy and Natural Resources | Geological Survey of Ireland    | Elm House, Earlsvale Road, Cavan                                                             |
| 10       | 06/06/2014    | Mary Hannan                                                                               | Hannan Family                   | Scurmore, Enniscrone. Co. Sligo                                                              |
| 11       | 06/06/2014    | John Conneely, Director                                                                   | Inland Fisheries Ireland        | IFI Ballina, Ardnaree House, Abbey Street, Ballina, Co. Mayo                                 |
| 12       | 06/06/2014    | Derek Trenaman, Ceardean Ltd.                                                             | David McGowan                   | 169 Inchicore Road, Inchicore, Dublin 8                                                      |
| 13       | 06/06/2014    | H. Sheridan                                                                               |                                 | Main Street, Enniscrone, Co. Sligo                                                           |

## Recent legislation

The **Local Government Reform Act 2014**, in **Schedule 3 (Reserved functions), Part 2 (Reserved functions that may be performed under Section 131A(1)(b) in respect of a Municipal District by Municipal District Members or the Local Authority)** includes the following provision:

| Reference no. | Description of reserved function                                                                                          | Provision under which reserved function is conferred                                                                                                                              |
|---------------|---------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 12            | A decision in relation to the making, amendment or revocation of a local area plan within the meaning of the Act of 2000. | Section 20 (as amended by section 9 of the Planning and Development (Amendment) Act 2002 and section 13 of the Planning and Development (Amendment) Act 2010) of the Act of 2000. |

The above provision means that the Draft Enniscrone Local Area Plan may be considered (amended, adopted) by the members of the Ballymote-Tobercurry Municipal District instead of the full County Council.

## What happens next

The Chief Executive (Manager) has responded to each submission individually and made one recommendation regarding a correction to the wording of objective TCO-4. This correction is **not** an amendment of the Draft LAP.

## The Chief Executive recommends that the Draft Enniscrone LAP 2014-2020 be adopted without any further modifications.

If the Members accept the Chief Executive's overall recommendation to adopt the Enniscrone Local Area Plan without further modifications, they can adopt the Plan at the Municipal District meeting of 10 July 2014.

Should the Members propose material amendments (i.e. substantial changes to the zoning or objectives of the Draft LAP), these would have to be screened for environmental effects and, if necessary, an Environmental Report and possibly a Natura Impact Report would have to be prepared in consultation with prescribed environmental agencies.

Following the completion of the assessments, the proposed amendments will have be placed on public display for a period of four weeks, during which the public will be invited to make written submissions exclusively on the proposed amendments and the corresponding assessments.

The Chief Executive will then prepare a Second Chief Executive's Report, which will be submitted to the Members for consideration.

Please note the following paragraph extracted from **Section 20 Consultation and adoption of local area plans**, introduced in the Planning and Development Act 2000 through the 2010 Amendment:

**20 (3) (r)** When performing their functions under this subsection, the members of the planning authority shall be restricted to considering the proper planning and sustainable development of the area, the statutory obligations of any local authority in the area and any relevant policies or objectives for the time being of the Government or of any Minister of the Government.

Miriam Hannan

**Issue no. 1**

The submission expresses concerns regarding the “lack of traffic calming on the Ballina side of Enniscrone” where the road is very wide and cars travel and overtake at high speed. M. Hannan requests that traffic calming measures be included in the LAP.

**Opinion**

The submission refers to the portion of the regional road R297 on the south-western side of Enniscrone.

**Section 8.3.1 Town centre and transitional zones** (p. 74 of the Draft LAP) proposes to create two types of traffic zones along the R-297: a town centre zone and two transition zones on either side of the town centre, in compliance with the *Design Manual for Urban Roads and Streets* (DoE, DoT, 2013).

Transition zones will be designed so as to prepare vehicle drivers to slow down before they reach the town centre zone. This can be achieved in a number of ways, such as reducing carriage way width, introducing parallel car parking, construction of build-outs and planting of trees/ornamental shrubs etc.

The Draft Plan contains the following relevant objective:

**TCO-4**      *Designate two transition zones in order to prepare vehicle drivers to slow down before they reach the town centre zone. These areas shall be redesigned/retrofitted in compliance with the provisions of the Design Manual for Urban Roads and Streets (DoE, DoT 2013).*

It is considered therefore that the Draft Plan already includes proposals for traffic calming measures along the R-297. It is acknowledged, however, that objective TCO-4 does not specifically state that the transition zones shall be created along the R-297 and therefore may be unclear.

The road number should be included in the wording of objective TCO-4 in the interest of clarity. This clarification does not represent an amendment to the Draft Plan.

**Recommendation**

Clarify the text of objective TCO-4 by including the road number as shown in bold letters below:

**TCO-4**      *Designate two transition zones **along the R-297**, in order to prepare vehicle drivers to slow down before they reach the town centre zone. These areas shall be redesigned/retrofitted in compliance with the provisions of the Design Manual for Urban Roads and Streets (DoE, DoT 2013).*

## **Submission no. 2**

14 May 2014

Cian O'Mahony, Scientific Officer, SEA Section  
Office of Environmental Assessment, Environmental Protection Agency

### **Issue no. 1**

The EPA notes the Council's position with regard to the need for Strategic Environmental Assessment of the Plan and also refers to the Agency's previous submission.

#### **Opinion**

The EPA's acknowledgment is noted.

#### **Recommendation**

No change to the Draft Plan.

### **Issue no. 2**

The Agency recommends that any future proposed amendments or variations should be assessed to determine their likelihood of resulting in significant adverse effects on the environment.

#### **Opinion**

This recommendation is noted.

#### **Recommendation**

No change to the Draft Plan.

### **Issue no. 3**

In implementing the Plan, adequate and appropriate infrastructure should be in place, or required to be put in place, to service any development proposed and authorised during the lifetime of the particular Plan.

#### **Opinion**

**Chapter 9 Infrastructure** of the Draft LAP indicates that the existing infrastructure within the LAP area (water supply, wastewater treatment, road network) has the capacity to serve the local population and businesses during the lifetime of the Plan and beyond.

#### **Recommendation**

No change to the Draft Plan.

**Submission no. 3**

28 May 2014

Olivia Morgan, Programme and Regulatory Unit  
on behalf of the National Roads Authority

**Issue no. 1**

The letter from the NRA acknowledges the receipt of the Council's notification regarding the Draft LAP. The Authority has no comment to make in this regard.

**Opinion**

Noted.

**Recommendation**

No change to the Draft Plan.

**Submission no. 4**

29 May 2014

Anthony Reape, Armstrong Reape Architectural Services  
on behalf of Patrick Kilcullen

**Issue no. 1**

This submission requests that Protected Structure No. 112 be removed from the Record of Protected Structures. It is contended that the building does not have the particular architectural or heritage qualities which would warrant its continued inclusion on the list of protected structures.

**Opinion**

The Record of Protected Structures (RPS) is part of the County Development Plan 2011-17 (CDP), which is not currently under review.

Any changes (additions, deletions) to the RPS can be made during the formal review of the CDP and associated documents, due to commence in 2015.

**Recommendation**

No change to the Draft Plan.

**Submission no. 5**

3 June 2014

Anthony Reape, Armstrong Reape Architectural Services  
on behalf of Tommy and Renée Foody

**Issue no. 1**

The submission notes the proposed removal of residential zoning from a site at Carrowhubbuck South (marked 5 on the Submissions Map), previously zoned residential. It is requested that the residential

zoning of this site and of the adjoining lands be retained “to allow for future need”. The submission states that “it would be detrimental to remove too much residential zoning at this time”.

### **Opinion**

The Core Strategy for County Sligo, included in the County Development Plan, allocates 14.8 ha of greenfield residential land to cater for the further development of Enniscrone up to 2017.

In order to comply with the requirements of the Core Strategy, it was necessary to reduce the excessive amount of land zoned for housing in the current LAP 2004-2013.

The removal of residential zoning from various lands within the Plan area was based on the principle of sequential development, which requires that development should proceed from the centre outwards. Therefore, the most peripheral/marginal lands are now proposed for inclusion in the buffer zone.

The site subject of this submission, a substantial field located on the eastern periphery of Enniscrone, has been re-designated as buffer zone.

**It should be noted that any future housing needs of members of the Foody family can be accommodated on family lands – subject to normal planning considerations – even if such lands are included in the buffer zone and not zoned residential.**

### **Recommendation**

No change to the Draft Plan.

## **Submission no. 6**

4 June 2014

Kathleen Gilroy

### **Issue no. 1**

The submission notes that it is proposed to remove the residential zoning from the eastern corner of an existing residential site (marked 6 on the Submissions Map) as well as from other lands in the area at Carrowhubbuck South.

K. Gilroy is concerned that in the absence of residential zoning on the subject site and adjacent lands, the public sewer may never be extended to serve this area of Enniscrone.

It is requested that residential zoning be retained for this site and the adjoining lands and that the LAP include the provision of a sewer network in this area of Carrowhubbuck South.

### **Opinion**

The Core Strategy for County Sligo, included in the County Development Plan, allocates 14.8 ha of greenfield residential land to cater for the further development of Enniscrone up to 2017.

In order to comply with the requirements of the Core Strategy, it was necessary to reduce the excessive amount of land zoned for housing in the current LAP 2004-2013.

The removal of residential zoning from various lands within the plan area was based on the principle of sequential development, which requires that development should proceed from the centre outwards. Therefore, the most peripheral/marginal lands are now proposed for inclusion in the buffer zone.

The site subject of this submission, together with the adjoining lands to the east, north and south, has been re-designated as buffer zone, due to its peripheral location.



It should be noted that the County Council is no longer in charge of the wastewater infrastructure serving Enniscrone.

Any decision with regard to extending the public sewer to Carrowhubbuck South is within the remit of Irish Water. It is noted that Enniscrone is not listed in Irish Water's current Capital Investment Programme.

### **Recommendation**

No change to the Draft Plan.

### **Submission no. 7**

4 June 2014

Michael Gilroy

#### **Issue no. 1**

The submission notes that it is proposed to remove the residential zoning from lands behind (to the east of) an existing residential site (marked 7 on the Submissions Map) at Carrowhubbuck South.

M. Gilroy is concerned that in the absence of residential zoning on the subject site and adjacent lands, the public sewer may never be extended to serve this area of Enniscrone.

It is requested that residential zoning be retained for this site and the adjoining lands and that the LAP include the provision of a sewer network in this area of Carrowhubbuck South.

#### **Opinion**

The Core Strategy for County Sligo, included in the County Development Plan, allocates 14.8 ha of greenfield residential land to cater for the further development of Enniscrone up to 2017.

In order to comply with the requirements of the Core Strategy, it was necessary to reduce the excessive amount of land zoned for housing in the current LAP 2004-2013.

The removal of residential zoning from various lands within the plan area was based on the principle of sequential development, which requires that development should proceed from the centre outwards. Therefore, the most peripheral/marginal lands are now proposed for inclusion in the buffer zone.

The site subject of this submission, together with the other lands to the east and south, has been re-designated as buffer zone, due to its peripheral location.

It should be noted that the County Council is no longer in charge of the wastewater infrastructure serving Enniscrone.

Any decision with regard to extending the public sewer to Carrowhubbuck South is within the remit of Irish Water. It is noted that Enniscrone is not listed in Irish Water's current Capital Investment Programme.

### **Recommendation**

No change to the Draft Plan.

## Submission no. 8

5 June 2014

Anthony Reape, Armstrong Reape Architectural Services  
on behalf of Tony Carrabine

### Issue no. 1

The submission notes the proposed removal of residential zoning from a site at Carrowhubbuck South (marked 8 on the Submissions Map), previously zoned residential. It is requested that the residential zoning of this site and of the adjoining lands be retained “to allow for future need”. The submission states that “it would be detrimental to remove too much residential zoning at this time”.

### Opinion

The Core Strategy for County Sligo, included in the County Development Plan, allocates 14.8 ha of greenfield residential land to cater for the further development of Enniscrone up to 2017.

In order to comply with the requirements of the Core Strategy, it was necessary to reduce the excessive amount of land zoned for housing in the current LAP 2004-2013.

The removal of residential zoning from various lands within the plan area was based on the principle of sequential development, which requires that development should proceed from the centre outwards. Therefore, the most peripheral/marginal lands are now proposed for inclusion in the buffer zone.

The site subject of this submission, a substantial field located on the eastern periphery of Enniscrone, has been re-designated as buffer zone.

**It should be noted that any future housing needs of members of the Carrabine family can be accommodated on family lands – subject to normal planning considerations – even if such lands are included in the buffer zone and not zoned residential.**

### Recommendation

No change to the Draft Plan.

## Submission no. 9

5 June 2014

Mary Brady, Corporate Support Unit  
Department of Communications, Energy and Natural Resources

### Issue no. 1

This submission is made on behalf of the Geological Survey Ireland (GSI). It is requested that if a geological heritage site is identified within the “study area”, the GSI be contacted for further information and possible mitigation measures if applicable.

### Opinion

No geological investigations have been undertaken as part of the preparation of the Draft Enniscrone LAP. However, it is noted that a proposed geological Natural Heritage Area exists on the western edge of the Plan area, on the coast.

**Section 7.1.8 Geological heritage sites** (p. 98 of the County Development Plan 2011-2017) contains the following relevant objective, which should ensure the protection of the above-mentioned site:

**O-NH-24** *Protect and maintain the character and integrity and conservation value of those features or areas of geological interest that are listed in this Plan or that may be proposed by the DoEHLG and /or the GSI in the lifetime of this Plan.*

It is considered that this is sufficient to protect the area at this stage.

### **Recommendation**

No change to the Draft Plan.

### **Submission no. 10**

6 June 2014

Mary Hannan  
on behalf of the Hannan family

### **Issue no. 1**

The submissions requests that the lands marked 10 on the Submissions Map, proposed for inclusion in the Strategic Land Reserve (SLR), retain their existing residential zoning.

It is argued that the change in the zoning of these lands (which have the benefit of planning permission) would reduce the value of the entire property. The owners of the lands are also concerned about “the impact of it having the planning”.

### **Opinion**

The Core Strategy for County Sligo, included in the County Development Plan, allocates 14.8 ha of greenfield residential land to cater for the further development of Enniscrone up to 2017.

In order to comply with the requirements of the Core Strategy, it was necessary to reduce the excessive amount of land zoned for housing in the current LAP 2004-2013.

The removal of residential zoning from various lands within the plan area was based on the principle of sequential development, which requires that development should proceed from the centre outwards. Therefore, the most peripheral/marginal lands are now proposed for inclusion in the buffer zone.

The lands subject of this submission – measuring roughly 2.3 ha – have been re-designated as buffer zone, due to the peripheral location.

It must be emphasised, however, that the lands are part of a larger site – circa 9.7 ha – with live planning permission, recently extended until 2018.

Approximately 7.4 ha, or three-quarters, of the lands with planning permission have retained residential zoning and only the northern, most peripheral portion (2.3 ha or one quarter), is proposed to be included in the SLR.

**However, the proposed SLR designation does not preclude the implementation of the planning permission on the entirety of lands benefiting from that permission, including the lands subject of this submission.**

### **Recommendation**

No change to the Draft Plan.

## Submission no. 11

6 June 2014

John Conneely  
on behalf of Inland Fisheries Ireland (IFI)

Having reviewed the Draft Enniscrone Local Area Plan, the Inland Fisheries Ireland is satisfied that the plan will have no significant impacts on the fisheries environment. However, the IFI made several comments which are outlined below.

### Issue no. 1

Sligo County Council must ensure that the Enniscrone wastewater treatment plant has the capacity to treat any increase in biological or hydraulic loading as a result of development within the town. Policies P-WW-17 and P-WW-15 are supported and must be enforced.

#### Opinion

The Draft LAP indicates that the capacity of the existing wastewater treatment is sufficient at present. Future upgrades of the wastewater treatment plant will be the responsibility of Irish Water.

#### Recommendation

No change to the Draft Plan.

### Issue no. 2

The inclusion of a development-free buffer zone is welcomed.

#### Opinion

Noted.

#### Recommendation

No change to the Draft Plan.

### Issue no. 3

The Plan should contain a policy on the protection of aquatic habitat in addition to P-WQ-10. This should include the protection of riparian vegetation along watercourses by zoning the land adjacent to the Bellawaddy and Devlin Rivers as open space and putting buffer zones in place along their banks.

#### Opinion

**Section 10.1 Water quality** of the CDP contains eleven water quality policies and twelve water quality objectives. In particular, **P-WQ-10** states that it is the policy of the County Council to prohibit any development which is likely to lead to the deterioration of water quality. **Section 7.1.5 Inland waters** (p. 94-96 of the CDP) includes a subsection on the protection of Riparian Zones and relevant inland water policies and objectives designed to protect the water quality of rivers and streams in the County area.

Apart from land that is already developed, and existing open space (Golf Course and Pitch and Putt Course), the banks of the Bellawaddy and Devlin Rivers have been included in the buffer zone that surrounds Enniscrone.

It is considered that the existing CDP and Draft LAP provisions are sufficient to protect aquatic habitats.

**Recommendation**

No change to the Draft Plan.

**Issue no. 4**

The submission requests that any drainage works or in-stream works carried out by the County Council should be carried out in consultation with the IFI.

**Opinion**

Noted.

**Recommendation**

No change to the Draft Plan.

**Issue no. 5**

The proposed Bellawaddy Bridge area improvements (section 11.2.3 in the Draft LAP) should be carried out in consultation with the IFI.

**Opinion**

This request is noted. The IFI is a statutory body and as such any significant works requiring planning permission or a Part 8 will be referred to them accordingly.

**Recommendation**

No change to the Draft Plan.

**Issue no. 6**

Routine surveys for invasive species should be carried out to identify any additional areas which require control.

**Opinion**

This request is noted. It is considered that the Draft LAP objective NHO-1 – which states the Council’s intention to control and prevent the spread of invasive species within the Plan area – is sufficient in this regard.

**Recommendation**

No change to the Draft Plan.

## Submission no. 12

6 June 2014

Derek Trenaman, Ceardean Design and Construction  
on behalf of David McGowan

### Issue no. 1

The submission states that the area zoned for tourism facilities at Muckduff is not large enough to support a viable camping ground with WC, washing and cooking facilities. It is argued that the camping grounds at Strandhill, for example, are 50% larger than the site in the Plan. The camping grounds at Strandhill are considered to be the minimum viable operating site.

It is requested to increase the lands zoned for tourism to at least 70% of the overall available site at Muckduff.

### Opinion

The 'available site' mentioned above (marked 12 on the Submissions Map) represents the land between the shores of the Bellawaddy River and the county road L-26027.

Lands directly to the south of the Bellawaddy River have a significant risk of flooding – according to the Preliminary Flood Risk Assessment Maps (OPW, 2011) – and have also been identified by the Council's Heritage Office as a potential wetland site. These lands have therefore been excluded from the development limit and placed in the buffer zone.

A portion of the site has been zoned 'Transport node and car parking' to accommodate a car park out of the town centre to cater for the large parking demand generated by the beach on busy summer days. This site is considered optimal for such use, given its accessibility and proximity to the beach.

With regard to the area proposed to be zoned for tourism-related uses, it is considered that there is sufficient scope for expansion to the south (across the local road), should more land be required to facilitate the proposed campsite in the future. **This would not require a change in zoning, since uses such as camping and caravan parks are open to consideration in the buffer zone.**

### Recommendation

No change to the Draft Plan.

### Issue no. 2

It is contended that the proposed car park at Muckduff is far from the areas that experience parking difficulties, such as the beach, Main Street and the Ocean Sands Hotel, and is also lacking in "obvious direct linkages to the town or beachfront".

The submission states that the Council should first consider developing available land at the Beach front such as in the Hollows, at the lifeguard tower or vacant sites on the Main Street and Cliff Road.

The Council is requested to at least consider locating the car park "to the north of the Muckduff [i.e. tourism] site and to the south of the Bellawaddy River where direct pedestrian linkages can be established to the beach front and Main Street via a river walkway".

### Opinion

The proposed car park at Muckduff is considered the best possible option for a car park to serve the beach and town on busy days.

The suggestion to provide more car parking at the Hollows/lifeguard station conflicts with the Draft LAP objective to remove all car parking from the Hollows (TCO-10). Parking in the Hollows results in increased usage of the dunes by pedestrians and vehicles. This in turn, leads to damage to areas of grass and contributes to significant erosion of the dunes while negatively impacting upon the amenity value of the Hollows as a public open space.

Using vacant sites on Main Street and Cliff Road for car parking is not a viable option either. The use of vacant infill sites on the main streets of the town for car parking would negatively impact upon the streetscape and would only serve to increase traffic congestion at peak times. Furthermore, the amount of spaces available on such sites would not be sufficient to cater for demand on busy days.

Lands directly to the south of the Bellawaddy River are at risk of flooding, according to the Preliminary Flood Risk Assessment Maps (OPW, 2011), and have therefore been excluded from the development limit. They have also been identified as a potential wetland site. Locating the car park to the north of the tourism-zoned site, on the banks of the Bellawaddy River, is therefore not an option.

### **Recommendation**

No change to the Draft Plan.

### **Issue no. 3**

The proposed new relief roadway linking the L-2602 to the R-297 bisects the site at Muckduff, separating the proposed overflow car park and the land zoned tourism related uses. It is contended that “this division reduces available land and has serious implications for the development of a business plan to support a viable world class camping ground”.

The Planning Authority is asked to consider relocating the roadway in one of the following three ways:

- 1) Relocate the road to the eastern side of the site to connect into the existing roadway to the south of the Muckduff site;
- 2) Relocate the road off the site to the east beyond the established houses to the south of the site;
- 3) Relocate the road to the northern end of the site via the proposed (in this submission) revised location of the car park.

### **Opinion**

The road to the south of the tourism-zoned site is a narrow county road. The proposed road is planned to be a relief road and, as such, will be constructed to higher specification than a county road. Alternative routes (1) and (2) above involve the linking of the new relief road with the county road. This would require the upgrading of the county road which would lead to increased costs associated with the project.

In order to increase the likelihood of the relief road being constructed, it is necessary to minimise costs from an early stage where possible. Hence, it is imperative that the shortest, most direct route is found through undeveloped sites where possible.

Similarly, alternative route (3) involves three right-angle turns before arriving at the junction with the R297. This is not desirable from a traffic safety or cost perspective and would not make the new road an easy or desirable route.

### **Recommendation**

No change to the Draft Plan.

H Sheridan

**Issue no. 1**

The submission suggests that protection of the dunes must be achieved with know-how, resources and the necessary funding in consultation with the locals.

**Opinion**

The greatest threat to the coastal area in Enniscrone is from recreational uses, in particular in relation to sand dunes. The dunes are a dynamic system and are vulnerable to erosion. Walking through the dunes damages vegetation, thereby reducing the stabilising influence of Marram Grass. The fore-dunes between the beach and the Hollows are particularly susceptible, being used as access points to the beach from adjacent car parking areas and as recreational areas. These dunes play a fundamental role in the protection of the Hollows area.

Dune Management Schemes were carried out at Enniscrone in the 1990s. These included trapping sand and fixing it with dune grass along the fore-dunes at Bartragh Strand in front of the Caravan Park and stabilizing the dune corner at the access way to Bartragh Strand. Similar works were carried out in the Hollows area during the same period.

To protect the dunes it is necessary to restrict and manage car parking and footfall in the area. Pedestrian access to the beach should be well defined and walking across the dunes should be discouraged. Footfall should be restricted to a limited number of designated walkways on to the beach. Relevant objectives in relation to vehicular access restrictions are outlined in Chapter 8 of the Draft Plan.

It is an objective of the Draft Plan to *maintain and review dune management, to include, where necessary, appropriate fencing, boardwalks and public information boards in consultation with the National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht (OCP-3).*

**Recommendation**

No change to the Draft Plan.

**Issue no. 2**

The submissions seems to be suggesting that the activity surrounding the Pier should be restored to what it once was in terms of fishing boats and sale of fish. It states that Enniscrone should be subsidised to become a centre of knowledge for fishing skills.

**Opinion**

The Draft Plan acknowledges that the Pier is currently an underutilised resource in terms of its tourism capabilities. Current harbour facilities are inadequate to support local fishermen due to a lack of shelter and the fact that it is not an all-tide harbour. A diversification from fishing to other tourism orientated leisure activities, such as dinghy sailing, RIB (rigid inflatable boats) exploration, and small boat sea angling, is also limited due to the lack of facilities and current harbour restrictions.

The Draft LAP addresses the situation by proposing measures to improve the quality of the harbour and increase marine leisure potential:

- the provision of greater shelter at the harbour (refer to objective TOO-3);
- the construction of a marina (refer to objective TOO-2);



- improvement of the slipway and berthing facilities (refer to objective TOO-3);
- provision of boat parking for residents and visitors (refer to objective TOO-3);
- facilities for those participating in water sports (refer to objective TOO-3).

While subsidies or funding for specific initiatives cannot be secured through a Local Area Plan, the inclusion of appropriate zoning and development objectives, such as those listed above, can form the basis for funding applications to relevant agencies.

### **Recommendation**

No change to the Draft Plan.

### **Issue no. 3**

It is suggested that there should be a footpath from the Golf Club to the Barracks and to Ard na Greine. Cycle paths, friendly user areas for bikers, horses, push wheel vehicles are also called for.

### **Opinion**

The Draft Plan acknowledges that there are serious deficiencies in the provision and quality of footpaths in Enniscrone and indicates that footpaths are required along the following routes (see Section 8.4.1 Walking):

- parts of the western side of Pier Road;
- Cliff Road as far as the Pier;
- various sections of the Main Street;
- both sides of the L-66017-0, leading to the Cahermore holiday village.

In order to encourage walking as a safe and convenient mode of transport, as well as a healthy leisure activity, it is proposed to create a network of pedestrian routes and linkages throughout Enniscrone town, particularly between areas of scenic value and interest (refer to objective TCO-14).

These areas include the cliff edge, the Pier, Promontory Fort, Castle Field and the Hollow. The works will entail the construction of footpaths along roads where none exist, as well as the creation of new walks around the town, along the proposed new roads.

### **Recommendation**

No change to the Draft Plan.

### **Issue no. 4**

A road is required to allow for easy access from Barracks area to the bridge or the Diamond Coast Hotel.

### **Opinion**

A new link road is proposed from the R297 (at Muckduff) to the L-2602-14 (at Frankford) – see objective TCO-1. This road will also act as a bypass of the centre of town.

### **Recommendation**

No change to the Draft Plan.

**Issue no. 5**

The submission calls for Maughans bathhouse on the rocks to be preserved.

**Opinion**

This building is included in the Record of Protected Structures associated with the County Development Plan 2011-2017 (RPS no. 107) and as such is required to be preserved.

**Recommendation**

No change to the Draft Plan.

**Issue no. 6**

The submission mentions the old church building adjacent to the Ben Bulben Hotel, presumably suggesting that this building be protected.

**Opinion**

It is an objective of this Plan to refurbish St. Mary's Church, which is currently in a derelict state (refer to UDO-3). The neighbouring former Ben Bulben Hotel is also in a derelict state. The joint redevelopment of these two structures/sites would create a positive image at the entrance to the town centre from the east.

The building has also been designated a *building of note*. Buildings of note are buildings which have been identified by reason of their vernacular character and positive contribution impact to the streetscape. Some of these buildings have been altered in the past, some of their original features have been eroded, but they still retain their original character.

The Draft Plan contains an objective to support the appropriate renovation and reuse of *buildings of note*, in order to retain Enniscrone's architectural character and strengthen its identity. It is considered essential to preserve elements of the original character of the town in order to emphasise identity and strengthen the sense of place.

**Recommendation**

No change to the Draft Plan.

**Issue no. 7**

A mini-marina should be provided for yachts, sailors and water learners.

**Opinion**

Objective TOO-2 states that it is an objective of the Plan to carry out a feasibility study into the construction of a marina at the Pier.

**Recommendation**

No change to the Draft Plan.

**Issue no. 8**

The submission mentions a town square at Pilot Bar and Hopkins Bar.

**Opinion**

In order for an urban area to function effectively as a town, it is important that the built fabric provides a central open space for markets, events, street festivals etc.

The Draft Plan has identified the car park in front of the Our Lady's Church on Main Street, which has the potential to become an urban square after the removal of the kerbing and walls currently in place. It is envisioned that this area will feature a shared surface for vehicles and pedestrians.

The public space in front of the Pilot Bar is not sufficient to provide a multi-functional place to be used for a variety of different activities.

**Recommendation**

No change to the Draft Plan.

**Issue no. 9**

The submission calls for more spaces for car parking, "siestas" (presumably meaning *fiestas*), festivals, traffic free areas.

**Opinion**

The above have already been addressed in the Manager's opinion on previous issues.

**Recommendation**

No change to the Draft Plan.

**Issue no. 10**

The Council is requested "appoint 10-20 *local guardian officials* (largely unpaid) to watch out and guard the town and facilities during heavy tourist times". These officials would have the power to caution, record, check and report on updated bye laws for the protection of sea, shore, seats, dunes, road, paths, residents etc.

**Opinion**

The above issue cannot be addressed through the Local Area Plan.

**Recommendation**

No change to the Draft Plan.

**Issue no. 11**

The submissions requests that empty premises be converted or used properly.

**Opinion**

The Draft Plan acknowledges that there a number of vacant commercial properties in the town centre. The presence of vacant units projects an unfavourable image for the town in terms of its economic vitality and prosperity. It is important to encourage and support the re-use of such properties.

The Draft LAP includes a policy to promote the re-use of existing vacant retail premises within Enniscrone, particularly on Main Street (RDP-2).

**Recommendation**

No change to the Draft Plan.

**Issue no. 12**

It is suggested that “a use” should be found for the holiday homes that are empty for seven months of the year.

**Opinion**

The high number of holiday homes and the high vacancy rate for a large part of the year in Enniscrone are acknowledged.

It is not within the remit of this Local Area Plan to ‘find a use’ for holiday homes. The Plan does require that all future houses built in Enniscrone are suitable for permanent living (policy HP-4). This will ensure that future housing may be used as holiday accommodation or permanent living, as required.

**Recommendation**

No change to the Draft Plan.

# Submissions received on draft Enniscrone LAP

