

# Manager's Report

on submissions and observations  
received in relation to the

## **Draft Strandhill Mini-Plan / Proposed Variation of CDP 2011-2017**

15 April 2013

Sligo County Council  
Development  
Planning Unit



# 1. Introduction

The Draft Strandhill Mini-Plan/Variation no. 1 of the *Sligo County Development Plan 2011-2017* (SEDP) was on public display from 22 January to 5 March 2013 (both dates included).

The proposed variation involves the insertion of an additional chapter (Chapter 44) in Volume 2 of the CDP – Strandhill Mini-Plan. This chapter would comprise of a brief description of the settlement, a number of objectives specific to the locality and a set of maps (Zoning Map, Objectives Map, Transport Objectives Map and Designations Map).

The text and maps of the Draft Strandhill Mini-Plan were accompanied on public display by the following supporting documentation:

- Explanatory Note
- Strategic Environmental Assessment (SEA) Screening Report
- Appropriate Assessment (AA) Report
- Strategic Flood Risk Assessment Report

During this public consultation period, Sligo County Councils received 19 submissions on the Proposed Variation. One submission was received after the closing date.

## How the Manager's Report is organised

This Report summarises the issues raised in submissions and gives the Manager's response to these issues, including appropriate recommendations, where necessary.

On receipt, each submission was allocated an official reference number, in the order in which they were received.

Specific sites mentioned in various submissions are shown on a Submissions Map attached to the Manager's Report.

**Section 2** contains the list of persons and organisations that made submissions on the proposed variation.

**Section 3** of this Report summarises the issues raised in each submission and, where appropriate, gives the Manager's opinion on the issues. A number of modifications are recommended in response to several submissions. None of these modifications represents a material alteration (amendment) of the Draft Plan and none would have any impact on Natura 2000 sites or the environment in general.

## The role of the elected members

Deciding whether to adopt or to reject the proposed variation of the CDP is a function reserved for the elected members of Sligo County Council. The members are required to consider the proposed variation (including the accompanying reports) and the Manager's recommendations contained in this Report.

Having considered the Manager's Report, the Members may decide to make the variation with or without further modifications, or may refuse to make the variation. If the Members decide to make any modification that would be a material alteration of the proposed variation, then a further period of public consultation becomes necessary.

## Next steps

Before engaging in public consultation on any proposed material alterations (amendments), the Planning Authority must determine whether the proposed amendments would have significant impacts on the environment, in particular on Natura 2000 sites. This is done through Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) screening.

It must be noted that the variation cannot be made with any modification that would have significant effects on the environment or that would adversely affect the integrity of a European site.

If it is determined that the proposed amendments would not have adverse effects as outlined above, they are placed on public display for a period of 4 weeks, during which submissions are invited. A further Manager's Report is then prepared.

The Members must consider the proposed variation, the proposed amendments, any environmental reports relating thereto and the Manager's Report before they decide to make the variation with or without the proposed amendments.

## Relevant legislation

According to Section 13 (6) of the Planning and Development Act 2000 as amended,

- (a) Subject to paragraphs (aa) and (ae), the members of the authority, having considered the proposed variation and manager's report may, as they consider appropriate, by resolution, make the variation which would, if made, be a material alteration, with or without further modification or they may refuse to make it and paragraph (c) shall apply in relation to any further modification.
  - (aa) The planning authority shall determine if a strategic environmental assessment or an appropriate assessment or both such assessments, as the case may be, is or are required to be carried out as respects one or more than one proposed modification that would, if made, be a material alteration of the variation of the development plan.
  - (ab) The manager shall, not later than 2 weeks after a determination under paragraph (aa), specify such period as he or she considers necessary following the determination as being required to facilitate an assessment referred to in paragraph (aa).
  - (ac) The planning authority shall publish notice of the proposed material alteration, and where appropriate in the circumstances, the making of a determination that an assessment referred to in paragraph (aa) is required, in at least one newspaper circulating in its area.
  - (ad) The notice referred to in paragraph (ac) shall state—
    - (i) that a copy of the proposed material alteration and of any determination by the authority that an assessment referred to in paragraph (aa) is required may be inspected at a stated place or places and at stated times, and on the authority's website, during a stated period of not less than 4 weeks (and that copies will be kept for inspection accordingly), and
    - (ii) that written submissions or observations with respect to the proposed material alteration or an assessment referred to in paragraph (aa) and made to the planning authority within a stated period shall be taken into account by the authority before the variation of the development plan is made.

- (ae) The planning authority shall carry out an assessment referred to in paragraph (aa) of the proposed material alteration of the draft development plan within the period specified by the manager.

.....

- (c) A further modification to the variation—
  - (i) may be made where it is minor in nature and therefore not likely to have significant effects on the environment or adversely affect the integrity of a European site,
  - (ii) shall not be made where it refers to—
    - (I) an increase in the area of land zoned for any purpose, or
    - (II) an addition to or deletion from the record of protected structures.

Further relevant provisions of Section 13 are as follows:

- (7) In making a variation under this section, the members of the authority shall be restricted to considering the proper planning and sustainable development of the area to which the development plan relates, the statutory obligations of any local authority in the area and any relevant policies or objectives for the time being of the Government or any Minister of the Government.
- (11) A variation made to a development plan shall have effect from the day that the variation is made.



## 2. List of persons and organisations that made submissions on the Draft Strandhill Mini Plan/Variation No. 1 of CDP

### Submission received during the public consultation period

Ref. No.	Date Received	Name or Agency	On behalf of (where applicable)	Address
01	18/02/2013	Joe Corcoran Airport Manager	Sligo North West Airport Co. Plc	Strandhill, Co. Sligo
02	01/03/2013	D. Harte, D.A. Harte & Associates	Michael & Caitriona Kivlehan	C/o D.A. Harte & Associates, Rosses Point, Co. Sligo.
03	01/03/2013	Cian O'Mahony Scientific Officer	SEA Section, Office of Environmental Assessment, Environmental Protection Agency	EPA Regional Inspectorate, Inniscarra, Co. Cork
04	01/03/2013	Colette Kivlehan & Martin Peacock		20 Woodville Court, Second Sea Road, Cummeen, Sligo
05	02/03/2013	Jorge & Deirdre Correia		Jorge & Deirdre Correia, No. 6 Sandy Cove, Strandhill
06	04/03/2013	John Byrne		e-mail
07	04/03/2013	Peigin Doyle		e-mail
08	04/03/2013	Hugh MacConville		Carnadough, Strandhill
09	04/03/2013	David McCoy, Chairman	Strandhill Business Community	Strandhill
10	04/03/2013	Michael McEnroe		13 The Sycamores, Strandhill
11	04/03/2013	Kieran Tobin		Carnadough, Strandhill
12	04/03/2013	Neil Walton		Voya Seaweed Baths, Strandhill
13	05/03/2013	Caroline Brady, Director	Border Regional Authority	Corlurgan Business Park, Ballinagh Road, Cavan
14	05/03/2013	Patrick Carty		Strathbeg, Rosses Point, Co. Sligo
15	05/03/2013	Michael Connolly		Strandhill Lodge & Surf School, Strandhill
16	05/03/2013	Noel O'Connor	Department of Agriculture, Fisheries and Food	Climate Change Section, Johnstown Castle Estate, Wexford

17	05/03/2013	Michael Keane, Chair & Vice-Chair	Strandhill Community Development Association	Strandhill
18	05/03/2013	Seamus Maye	Maye family	Culleenamore House, Culleenamore, Strandhill, Co. Sligo
19	05/03/2013	Tadhg O'Mahony, Senior Scientific Officer	EPA	SEA Section, Office of Environmental Assessment, Environmental Protection Agency, Regional Inspectorate, Inniscarra, Co. Cork

**Late submission**

L-1	08/03/2013	Patricia O'Leary	Development Applications Unit, Department of Arts, Heritage and the Gaeltacht	Newtown Road, Wexford
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**Submission no. 1**

18 February 2013

Joe Corcoran, Airport Manager  
on behalf of Sligo North-West Airport Co. Plc

**Issue no. 1**

Joe Corcoran points out that the Terminal car park and the sewage treatment plant appear to be located in the SAC, “despite assurances from OPW that this was a simple mapping error”.

The Draft Plan does not seem to address the issue of the SAC boundaries. The Airport Manager fears that this could impact negatively on any works that the Airport needs to carry out in the future.

**Opinion**

The County Development Plan, including Strandhill Mini-Plan, cannot address the issue of the SAC boundaries. While the NPWS has acknowledged that there are boundary discrepancies which have resulted from the automated translation of drawings from an older mapping system into a newer one, it is a matter for the DAHG, specifically NPWS, to issue accurate mapping.

The Airport management should consult with NPWS in relation to any future works that might appear to be located in the SAC.

**Recommendation**

No change to the proposed variation.

**Issue no. 2**

The Transport Objectives map shows paths traversing Airport lands. The Airport Manager indicates that no consultation has taken place in relation to such paths and requests clarification on the matter.

**Opinion**

The indicative recreational trails shown on **Map 3 Transport objectives** represent recognition of existing walking routes used by locals in Strandhill.

Any improvement to these trails will be undertaken in consultation with the landowners, including the Airport, as the case may be.

**Recommendation**

No change to the proposed variation.

**Submission no. 2**

1 March 2013

D.A. Harte and Associates  
on behalf of Michael and Caitriona Kivlehan

**Issue no. 1**

The submissions notes the “de-zoning” of a site (marked 2 on the Submissions Map) previously zoned for housing. It is requested that the residential zoning be retained, as the landowners have two adult daughters “who have lived in Strandhill and are anxious to reside there for the future”.

The landowners indicate that they have only one other piece of land, which is to be traversed by the proposed New Airport Road and fear that any application for a house on this land would be considered premature.

### **Opinion**

In order to comply with the requirements of the Core Strategy, which allocated only 14.4 ha of greenfield residential land to Strandhill for the period up to 2017, it was necessary to change the zoning designation of various fields within the plan area.

The site subject of this submission has been re-designated as buffer zone.

It should be noted that in **Chapter 13 Mini-Plans: general policies** (p. 3 in Volume 2 of the CDP), policy **13.8.E** provides the following:

Within the Buffer Zone, proposals for one-off rural housing shall only be accommodated in case of proven need of immediate family members of locally-resident families who wish to build on their own land and have no suitable option on their holdings outside the buffer zone.

Based on the above policy, the daughters of M. And C. Kivlehan would be able to apply for planning permission to build a house on family land in the buffer zone.

### **Recommendation**

No change to the proposed variation.

## **Submissions no. 3 and 19**

1 and 5 March 2013

Cian O'Mahony, Scientific Officer (1 March 2013)  
and Tadhg O'Mahony, Chief Scientific Officer (5 March 2013)  
on behalf of the Environmental Protection Agency (EPA)

### **Issue no. 1**

The EPA notes the Council's position with regard to the need for Strategic Environmental Assessment.

### **Opinion**

Noted.

### **Recommendation**

No change to the proposed variation.

### **Issue no. 2**

Consideration should be given to showing how the Environmental Protection Objectives of the SEA for the County Development Plan have been taken into account in the preparation of the mini-plan, in the context of ensuring that the potential for cumulative effects have been taken into account. "There would be merits in providing a table showing how the existing SEA has influenced".

### **Opinion**

It is intended to update the SEA Screening Report upon adoption of the proposed CDP variation / Strandhill Mini-Plan by including additional relevant information. In this context, it is proposed to

include an appendix to Section 8.5 of the Environmental Report associated with the CDP, where the interaction between the objectives of Strandhill Mini-Plan and the Strategic Environmental Objectives will be shown in the form of a table designed in the same manner as that in Section 8..

### **Recommendation**

No change to the proposed variation.

### **Issue no. 3**

The Agency acknowledges the inclusion of specific objectives for protection of “*Landscape/Natural heritage/Open Space*” and “*Coastal Protection*” in particular. The re-designation of development lands to “*Buffer Zone*” within the boundary of the Cummeen Strand / Drumcliff Bay SAC is also acknowledged.

It should be ensured that the Strandhill Mini-plan will not conflict with the policies/objectives of the County Development Plan 2011-17, and that other significant plans/programmes including the Sligo Bay Shellfish Waters Pollution Reduction Programme are taken into account.

### **Opinion**

The Draft Strandhill Mini-Plan, when adopted, will become a chapter (Chapter 44 in Volume 2) of the County Development Plan. It has been prepared on the basis of the general policies contained in Volume 1 of the CDP. The objectives included in the Draft Plan are specific to the locality and are not conflicting with any of the more general objectives of the CDP. In many instances, the Draft Mini-Plan objectives reiterate and re-emphasise CDP objectives from Volume 1.

It should also be noted that the Department of Agriculture, Food and the Marine had no comments or observations in relation to the Draft Mini-Plan or any potential effects on shellfish waters.

### **Recommendation**

No change to the proposed variation.

### **Issue no. 4**

Consideration should also be given to including an objective which “requires that Appropriate Assessment Screening be required for any plan/project with potential to impact on the adjacent designated Natura 2000 sites (Ballysadare Bay (SAC/NHA), Cummeen Strand / Drumcliff Bay (SAC/NHA), Cummeen Strand (SPA)).”

### **Opinion**

Objective **44.1.A** of the Draft Mini-Plan already includes the requirement for Appropriate Assessment Screening:

**44.1.A.** *Maintain and enhance the conservation value of the Natura 2000 sites surrounding the village. Ensure that Appropriate Assessment Screening is carried out for any plan or project within the Mini-Plan area with potential to impact on Ballysadare Bay SAC (site code 000622), Cummeen Strand/Drumcliff Bay SAC (site code 000627), Cummeen Strand SPA (site code 004035) and Ballysadare Bay SPA (site code 004129).*

### **Recommendation**

No change to the proposed variation.

### **Issue no. 5**

It is noted that a flood risk assessment was carried out for the proposed Variation. However consideration should be given to highlighting areas which are at significant risk of flooding. It should also be ensured that development is appropriate to the risk of flooding identified and that requirements of the *Flood Risk Management Guidelines* (2009) are fully implemented as appropriate.

#### **Opinion**

The areas which are at risk from flooding (flood zones A and B) have been identified on Map 3 attached to the Strategic Flood Risk Assessment Report.

The requirements of the *Flood Risk Management Guidelines* 2009 will be implemented through the development management process, guided by the flood risk management policies and objectives contained in **Section 10.6.2 Flood risk** (p. 156-159 in Vol. 1 of the CDP).

#### **Recommendation**

No change to the proposed variation.

### **Issue no. 6**

The EPA reiterates the County Council's obligations in relation to the following:

- determine whether or not any future proposed Amendments/Variations would be likely to have significant effects on the environment.
- ensuring that 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 Variation.
- implementing the requirements of Article 6 of Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora, the Habitats Directive, in consultation with the National Parks and Wildlife Service (NPWS) with regard to Appropriate Assessment.

The Agency also refers to updated SEA Regulations (2011) and Habitats Regulations (2011).

#### **Opinion**

Noted.

#### **Recommendation**

No change to the proposed variation.

### **Issue no. 7**

The EPA notes that the proposed Variation was determined to require Stage 2 Assessment. This requirement should be examined in the context of the requirements for an assessment pursuant to Article 6 or 7 of the Habitats Directive being one of the criteria which can trigger the requirement for an environmental assessment under the SEA Directive. The National Parks and Wildlife Service (DAHG) should, as appropriate, be consulted on the proposed amendments to the specific objectives assessed as a result of the Stage 2 Appropriate Assessment.

#### **Opinion**

The undertaking of Stage 2 Assessment of the Draft Mini-Plan was due to a misalignment of the timeframe for the preparation/publication of the Draft and the timeframe for assessing its objectives under Article 6 of the Habitats Directive.

This resulted in an Appropriate Assessment Report which recommended minor adjustments to the wording of a number of objectives. It is proposed to incorporate these adjustments as minor modifications (i.e. non-material alterations) of the proposed Variation before it is adopted by the members of Sligo County Council.

The final Strandhill Mini-Plan, once adopted with the above-mentioned modifications, will pass the screening test of the Appropriate Assessment process, i.e. it will not require Stage 2 Assessment, provided that the draft mini-plan is not subject to material alterations which would affect Natura 2000 sites.

## **Recommendation**

Make the following minor modifications to the proposed variation, as recommended in the Appropriate Assessment Report (additions in blue):

### **Section 44.1 Landscape, natural heritage, open space**

Obj. G *Provide for a number of incidental public open spaces, notably: ...*  
should be amended to

*Provide for a number of incidental public open spaces whilst ensuring the protection of designated sites through screening for Appropriate Assessment, notably: ...*

### **Section 44.2 Coastal protection**

Obj. A *Prepare an integrated coastal management plan for Strandhill in consultation with relevant agencies and interested parties. This plan should address, inter alia, the existing and potential recreational uses of the area.*

should be amended to:

*Prepare an integrated coastal management plan for Strandhill in consultation with relevant agencies and interested parties. This plan should address, inter alia, the existing and potential recreational uses of the area. The coastal management plan will ensure the protection of Natura 2000 sites through the Appropriate Assessment process.*

### **Section 44.4 Mixed Use Zones**

Obj. D *Encourage the redevelopment of the Promenade 'Corner' on the sea front (MIX 1, Objectives Map) currently comprising shops, dwellings and a public open space, subject to any necessary coastal protection measures.'*

should be amended to:

*Encourage the redevelopment of the Promenade 'Corner' on the sea front (MIX 1, Objectives Map) currently comprising shops, dwellings and a public open space, subject to any necessary coastal protection measures whilst ensuring the protection of designated sites through screening for Appropriate Assessment at project level.*

### **Section 44.5 Transport, circulation and parking**

Obj. A *Reserve land for a New Airport Road linking the R292 to the existing Airport Road (R277).'*

should be amended to:

*Reserve land for a New Airport Road linking the R292 to the existing Airport Road (R277) whilst ensuring the protection of designated sites through screening for Appropriate Assessment at project level.*

- Obj. C *Extend the Promenade in a northerly direction and link up with the existing Airport Road as indicated on the Objectives Map, to include for the upgrading of the existing lane from the caravan park to the Airport Road. All necessary coastal protection measures should be incorporated into such a project. This extension should be developed in a similar fashion to the existing Promenade whilst also preserving as much as possible of the seafront area as a public amenity.'*

should be amended to:

*Extend the Promenade in a northerly direction and link up with the existing Airport Road as indicated on the Objectives Map, to include for the upgrading of the existing lane from the caravan park to the Airport Road whilst taking full account of the need to protect the natural and cultural heritage of the coast and the need to avoid significant adverse impacts on Natura 2000 Sites and on species protected by law. All necessary coastal protection measures should be incorporated into such a project. This extension should be developed in a similar fashion to the existing Promenade whilst also preserving as much as possible of the seafront area as a public amenity.*

#### **Section 44.6 Community Facilities**

- Obj. B *Require any development proposed on the greenfield site CF1 (refer to the Objectives Map) to provide a range of facilities such as a citizens' advice point, social services, tourist information, skate park and indoor sports. A youth centre and childcare facilities may be provided within the same building or in a separate structure.'*

should be amended to:

*Require any development proposed on the greenfield site CF1 (refer to the Objectives Map) to ensure the protection of designated sites through screening for Appropriate Assessment at project level. Any proposed development should provide a range of facilities such as a citizens' advice point, social services, tourist information, skate park and indoor sports. A youth centre and childcare facilities may be provided within the same building or in a separate structure.*

#### **Section 44.7 Tourism Development**

- Obj. A. *Promote the development of tourism related-infrastructure and facilities within the village in order to increase visitor numbers and to create more local employment.'*

should be amended to:

*Promote the development of tourism related-infrastructure and facilities within the village in order to increase visitor numbers and to create more local employment, subject to Appropriate Assessment under the Habitats Directive.*

- Obj. B *Provide a public parking and picnic area to the north of the caravan park, in conjunction with the new road (See Section 44.5). This area will be located adjacent to the existing caravan*

*park entrance, from where two-way traffic movements will operate (location marked TRANS 2 on the Objectives Map). In addition, adequate provision will be made for alternative circulation arrangements within the caravan park.'*

should be amended to:

*Provide a public parking and picnic area to the north of the caravan park, in conjunction with the new road (See Section 44.5), [subject to Appropriate Assessment under the Habitats Directive and the implementation of a Coastal Management Plan \(Obj. 44.2 A\) and a Management Plan for the Council lands at Killaspugbrone \(Obj. 44.1 B.\)](#). This area will be located adjacent to the existing caravan park entrance, from where two-way traffic movements will operate (location marked TRANS 2 on the Objectives Map). In addition, adequate provision will be made for alternative circulation arrangements within the caravan park.*

#### **Section 44.9 Buffer Zone**

*Obj. B Require all new and replacement agricultural structures to be designed in such manner that they do not interfere with the character of the landscape.'*

should be amended to:

*Require all new and replacement agricultural structures to be designed in such manner that they do not interfere with the character of the landscape, [whilst ensuring the protection of designated sites through screening for Appropriate Assessment at project level](#).*

#### **Section 44.10 Wastewater Treatment**

*Obj. A Upgrade the wastewater treatment plant at Killaspugbrone to cater for a population equivalent (PE) of circa 3,000.'*

should be amended to:

*Upgrade the wastewater treatment plant at Killaspugbrone to cater for a population equivalent (PE) of circa 3,000, [whilst ensuring the protection of designated sites through undertaking Appropriate Assessment at project level](#).*

**The introduction of the above additional wording in the respective objectives would not represent material alterations (amendments) of the Draft Mini-Plan, as they only serve to reinforce provisions already contained in Chapter 7 of the CDP.**

#### **Issue no. 8**

The classification of parts of the Airport Lands and runway in either Flood Risk Zone A or B is noted. It should be ensured where significant risk of flooding exists in lands already developed within the Plan area, that the potential for environmental pollution is managed through appropriate design standards. This is of particular relevance in the context of fuel/chemical storage areas. It is also relevant in the context of water/ waste water related infrastructure.

### **Opinion**

The potential for environmental pollution in the context of future airport-related developments and water/wastewater infrastructure projects will be managed through the development management process, based on the flood risk management policies of the CDP.

### **Recommendation**

No change to the proposed variation.

### **Issue no. 9**

The commitment to prepare a management plan in consultation with the DECLG for the council owned lands at Killaspugbrone is noted and welcomed. There would be merits in exploring opportunities to extend, where relevant and appropriate, the adopted management regime in adjoining lands where practical and subject to agreement.

### **Opinion**

The EPA's suggestion is noted. However, this is an operational matter which does not require an objective in the Strandhill Mini-Plan.

### **Recommendation**

No change to the proposed variation.

### **Issue no. 10**

The inclusion of a County Biodiversity wetland site within the Plan boundary is noted and welcomed. The requirement for an ecological impact assessment to ensure that any proposed development will not affect the integrity and conservation value of the site is also noted. The guidelines/ information referred to above could also incorporate any specific provisions for this wetland site.

### **Opinion**

The suggestion is noted.

### **Recommendation**

No change to the proposed variation.

### **Issue no. 11**

There would be merits in including a commitment to consult with the NPWS in implementing Objective D - maintain and review dune management.

### **Opinion**

It is agreed to reword the objective **44.2.D** as suggested by the EPA.

### **Recommendation**

Change the wording of objective **44.2.D** as follows (addition in blue):

*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 of the DAHG.*



The introduction of the above additional wording would not be a material amendment of the proposed variation.

### **Issue no. 12**

Consideration should be given to including a commitment to implementation of the Water Framework Directive River Basin Management Plan. The proposal to upgrade the Killaspugbrone waste water treatment plant is noted. The proposed upgrade of the Killaspugbrone plant should be prioritised in the context of water quality, adjoining ecological designations (SAC/ SPA) and Sligo Bay Shellfish Waters.

### **Opinion**

**Section 10.1 Water quality** (p. 145-149 in Volume 1 of the CDP) already includes a relevant objective:

**O-WQ-1** *Implement the management measures contained in the Western RBD, Shannon International RBD and North-Western International RBD Management Plans.*

The prioritisation of the upgrade to Killaspugbrone wastewater treatment plant is a matter for the relevant government agencies in charge of funding Sligo County Council's Water Services Investment Programme 2010-2013, which includes the Killaspugbrone project.

### **Recommendation**

No change to the proposed variation.

### **Submission no. 4**

1 March 2013

Colette Kivlehan and Martin Peacock

### **Issue no. 1**

C. Kivlehan and M. Peacock request that a site (marked 4 on the Submissions Map) be zoned for a house. They indicate that Sligo County Council decided to grant planning permission for a house on the site twice, under PL 09/343 and PL 10/327, but on both occasions An Bord Pleanala (ABP) overturned the decision, one of the reasons being that the site was in the buffer zone.

### **Opinion**

The site in question is located in the buffer zone, to the south of the development limit, at a remove from the village core, at the end of a ribbon development consisting of residential units. The site is on the eastern side of the R292 – a scenic route, on the lower western slopes of Knocknarea, where views of the mountain are protected by the CDP.

Strandhill Mini-Plan is designed to implement the CDP's general policies and objectives, including landscape protection objectives and the policy discouraging ribbon development and urban sprawl. For these reasons, the subject site and surrounding area have been designated as buffer zone. It would be inappropriate to zone a very small plot of land for a single house, as the submission seems to suggest.

It is noted that the main reason on which An Bord Pleanala based its decisions to refuse planning permission in both instances was the site's location along a scenic route and in a sensitive scenic landscape, where ribbon development should be curtailed, in order to prevent sprawl and preserve the rural environment (see below the reasons and considerations outlined in the ABP decisions in both cases).

In such circumstances, it is highly unlikely that a change of zoning from buffer to residential would result in a future grant of planning permission by the Board.

**ABP Decision under 21.235652 – Reasons and considerations (SCC Ref. 09/343)**

Taken in conjunction with existing residential development extending out from the village of Strandhill along the Regional Road, which is substandard, it is considered that the proposed development would contribute to further ribbon development along a designated scenic route and in a rural area that is under strong urban influence and would lead to demands for the provision of further public services and community facilities in an area where these are not proposed. On the basis of the documentation of the application and appeal An Bord Pleanála is not satisfied that an exception should be made to the more general planning policies for the area to accommodate the housing need of the applicant in the light of the previous grant of planning permission on a site which included the appeal site. The proposed development would militate against preservation of the rural environment and would contravene policies set out in “Sustainable Rural Housing Guidelines for Planning Authorities” issued by the Department of the Environment, Heritage and Local Government in April, 2005. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.

**ABP Decision under 21.238069 – Reasons and considerations (SCC Ref. 10/327)**

The site is located in a normal rural landscape that forms the context of views of Knocknarea Mountain, which is designated a Sensitive Rural Landscape and Visually Vulnerable area in the Sligo County Development Plan, 2005-2011. The adjoining R292 is designated a Scenic Route and views of the mountain and coast are protected. The site is also located within the buffer zone, outside the development limit in the Strandhill Local Area Plan 2003 - 2012, where it is the policy of the Planning Authority to safeguard the integrity of Strandhill’s sensitive scenic landscapes and development, including new residential development is generally limited and there is a long term objective to provide a lay-by/viewing area opposite the site. It is the policy of the planning authority, as set out in the development plan, to strictly control development within the context/setting of areas designated as sensitive and visually vulnerable and to protect the views from the adjoining scenic road. These policies are considered reasonable. It is considered that the proposed development would extend urban sprawl/ ribbon development in the area, would be visually intrusive in views from the R292, would set an undesirable precedent for further such developments which would conflict with the stated policies of the planning authority and, by itself and the precedent it would set for other such developments, would seriously injure the amenities of the area. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.

**Recommendation**

No change to the proposed variation.

**Submissions no. 5, 8, 11**

2-4 March 2013

Jorge and Deirdre Correia, Hugh MacConville, Kieran Tobin

**Issue no. 1**

A number of persons have sent submissions based on a template. The main point of these submissions is the opposition to the change of zoning of the land west of Airport Road (pine plantation) from “community, sports and recreation or caravan park, with minimal tree removal” to buffer zone.

It is indicated that the existing zoning must be kept to enable the provision of “much-needed sports and community recreational facilities” that would serve the growing population of Strandhill. An alternative location would not be feasible, “as no other suitable sites are available to the community”.

**Opinion**

**A. Context**

The Planning and Development Act Section 10 (2)(c) provides that a Development Plan shall include objectives for the conservation and protection of the environment including, in particular, the

archaeological and natural heritage and the conservation and protection of European sites. The subject lands are within a designated Natura 2000 site, the Cummeen Strand/Drumcliff Bay (Sligo Bay) Special Area of Conservation (SAC) (Site Code 000627). The site hosts two priority habitats namely, fixed coastal dunes with herbaceous vegetation ("grey dunes") and Petrifying springs with tufa formation (*Cratoneurion*).

### **B. Strandhill Local Area Plan 2003**

In 2003, two parcels of land within the existing SAC to the west of the Airport Road were separately reserved for "business and enterprise park/light industrial use" and "community, sports and recreation or caravan park, subject to minimal tree removal".

During the preparation of the 2003 Plan, Sligo County Council liaised with National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht (formerly Duchas) on the principle of zoning the land for the above purposes and whether such zoning would conflict with the existing SAC designation.

Sligo County Council subsequently zoned the lands in good faith for the above uses on an understanding from NPWS that the proposed zoned lands would be "de-designated" by National Parks and Wildlife Service (formerly Duchas), on the grounds that the features of interest for which the site were originally designated were no longer present in the proposed zoned lands to such an extent as to justify designation.

Despite the Council's undertakings, the two areas zoned for business/enterprise and community/sports/recreation continued to remain part of the Cummeen Strand/ Drumcliff Bay SAC. The designation remains in place and National Parks and Wildlife Service do not propose any boundary changes in the foreseeable future.

### **C. Appropriate Assessment**

Since the adoption of the 2003 Plan, there have been a number of changes to the policy and legislative provisions within which plans likely to have a significant effect on a Natura 2000 site must be considered. The term used for these provisions is 'Appropriate Assessment' as set out in the Habitats Directive (92/43/EEC) and the Planning and Development Act 2000 (as amended) under Part XAB.

In accordance with the requirements of the EU Habitats Directive (43/92/EEC) and EU Birds Directive (79/409/EEC), the impacts of the policies and objectives of all statutory land use plans on certain sites that are designated for the protection of nature (Natura 2000 sites<sup>1</sup>), must be assessed as an integral part of the process of drafting of the plan. This is to determine whether or not the implementation of the plan's policies could have negative consequences for the habitats or plant and animal species for which these sites are designated. This assessment process is called Appropriate Assessment (AA) and must be carried out on all stages of the plan making process.

Articles 6(3) and 6(4) of the Habitats Directive set out the provisions and decision-making tests for plans and projects likely to affect Natura 2000 sites.

Article 6(3) provides that any plan or project likely to have a significant effect, either individually or in combination with other plans or projects, shall be subject to an appropriate assessment of its

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<sup>1</sup> Natura 2000 sites include Special Areas of Conservation designated under the Habitats Directive and Special Protection Areas designated under the Birds Directive. Special Areas of Conservation are sites that are protected because they support particular habitats and/or plant and animal species that have been identified to be threatened at EU community level. Special Protection Areas are sites that are protected for the conservation of species of birds that are in danger of extinction, or are rare or vulnerable. Special Protection Areas may also be sites that are particularly important for migratory birds. Such sites include internationally important wetlands.

implications for the site in view of the sites conservation objectives. Art. 6(3) also sets out a decision making test, which provides that competent authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned.

Article 6(4) is a restricted derogation procedure which can be applied in cases where in spite of a negative assessment of the implications for the site and in the absence of alternative solutions, a plan or project must nevertheless be carried out for imperative reasons of overriding public interest (IROPI). Where a site hosts a priority habitat, as is the case with the subject lands the only IROPI that can apply are those relating to, human health and public safety, beneficial consequences of primary importance for the environment, or further to opinion of the Commission. Art. 6(4) is only permitted where the following 3 strict sequential criteria met:

- there is no less damaging alternative available;
- the Plan/Project is of overriding public interest (IROPI);
- compensatory measures are implemented to maintain coherence of Natura 2000 network.

The Article 6(4) derogation procedure has been used in Europe, but only in exceptional circumstances. To date, there have been no Art. 6(4) cases in Ireland.

#### **D. Strandhill Mini Plan/Proposed variation No. 1 of Sligo County Development Plan 2011-2017**

The proposed variation No. 1 (Strandhill Mini Plan) has been subject to Appropriate Assessment as required under Part XAB of the Planning and Development Act 2010 (as amended). The Natura Impact Report which accompanies the proposed Mini Plan incorporates an Appropriate Assessment (Stage 1 Screening) which determined that there were likely significant affects arising from the draft Mini Plan on the Natura 2000 sites within and adjoining the Mini Plan area. Accordingly, an Appropriate Assessment (Stage 2 AA) was conducted, which proposed mitigation measures to ensure that the draft Mini Plan would not adversely affect the integrity of the Natura 2000 sites (including the Cummeen Strand/Drumcliff Bay (Sligo Bay) Special Area of Conservation (SAC) (Site Code 000627).

#### **E. Submission**

The submission opposes the change of zoning of the land west of Airport Road (pine plantation) from “community, sports and recreation or caravan park, with minimal tree removal”, as specified in the Strandhill LAP, to buffer zone as deisgnated in the proposed variation. If the site were to be zoned for community, sports and recreation, this would constitute a material alteration of the proposed variation, which would then be subject to Appropriate Assessment. Such an assessment would be likely to determine that the altered zoning would be likely to adversely affect the site concerned. Such effects would be difficult to mitigate against, as the primary effect of zoning would be the permanent loss of designated habitat arising from development on the zoned land. Art. 6(3) also sets out a decision-making test for the Competent Authority in making the plan, which provides that competent authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned.

The derogation procedure provided by Article 6(4) is not helpful in this regard, as the first part of the derogation procedure is to establish that there is no less damaging alternative available. As there are other locations at which such a project could be delivered, one of which has been identified in the Mini-Plan, is it unlikely that this aspect of the derogation procedure could be met in this case.

It is acknowledged that Strandhill residents consider the provision of community/sports/recreation facilities at Strandhill as important to the local community and that substantial efforts have been put in fund-raising and the preparation of a planning application. However, for the reasons outlined above,

the zoning of lands designated for nature conservation for community/sports/recreation facilities conflicts with the provisions of the Habitats Directive and the Planning and Development Act Section 10 (2)(c), which provides that a Development Plan shall include objectives for the conservation and protection of the environment including, in particular, the archaeological and natural heritage and the conservation and protection of European sites.

Accordingly, having regard to the need to zone land for the provision of community/sports/recreation facilities and to comply with the provision of the Planning and Development Act 2000 (as amended) and the Habitats Directive, the Mini-Plan proposes that lands to the east of the Airport Road, located outside the Special Area of Conservation, be zoned for community/sports/recreation facilities.

### **Recommendation**

No change to the proposed variation.

### **Submissions no. 6, 9, 12**

4 March 2013

Neil Byrne, David McCoy, Neil Walton

Identical submissions have been received from the persons listed above. The main points are addressed below.

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

It is requested that the zoning of the lands to the west of the Airport Road (pine plantation) be retained.

#### **Opinion**

Refer to the Manager's response to Submissions 5, 8, 11.

#### **Recommendation**

No change to the proposed variation.

#### **Issue no. 2**

It is requested that the Council car park (lands zoned for mixed uses) be kept as a car park.

#### **Opinion**

The Council car park was zoned for mixed-use zoning in the Strandhill LAP 2003-2012, in recognition of its size and location in the village core. The area was considered suitable for terraced buildings of varying height, with commercial development on the ground floor (apartments on the upper floors) arranged around a courtyard and providing adequate parking to the rear. The existing parking function was intended to be relocated to the rear of street-fronting developments, between the current car park and the Promenade. This solution would have brought the parking area closer to the Promenade, while allowing for a more efficient use of publicly-owned lands.

The above considerations continue to apply. Therefore, the mixed-use zoning has been retained for the Council car park and adjoining area. The Mini-Plan also includes two specific objectives – 44.4.F-G – which are relevant to the existing car park.

However, the implementation of the above objectives depends on the provision of equivalent alternative car parking within the overall lands zoned for mixed uses at this location. In consequence,

the objective might not be realised during the lifetime of the mini-plan/CDP and the current use as a car park will continue on the site.

**Recommendation**

No change to the proposed variation.

**Issue no. 3**

The signatories feel that the beach front is vital for Strandhill and should be given high priority in terms of parking, traffic flow and access to walking trails.

**Opinion**

Like Strandhill LAP 2003, the Draft Mini-Plan recognises the importance of the Promenade and seeks to facilitate access for pedestrians and vehicles, car parking and the free flow of traffic. Please refer to objectives **44.4.C-D-E, 44.5.C, 44.7.A-B-C**.

**Recommendation**

No change to the proposed variation.

**Submission no. 7**

4 March 2013

Peigin Doyle

**Issue no. 1**

The submission supports the proposed zoning, particularly the changes from residential to buffer zone at Carrowdough. It emphasises the need to retain views of Knocknarea from the village core, from Carrowdough and from the regional road R-292.

**Opinion**

Noted. The views of Knocknarea from the village core cannot be protected, because the area is zoned for development. However, the views are protected along the scenic route R-292 outside the development limit.

**Recommendation**

No change to the proposed variation.

**Issue no. 2**

Peigin Doyle makes a number of suggestions as follows:

- a. The Zone of Archaeological Protection on Knocknarea should include the archaeological monuments on the northern slopes. A walking map should be prepared and the monuments should be signposted.
- b. The public right of way at Culleenamore Beach, which was fenced off, should be reopened.
- c. A flood management plan should be prepared for Carrowdough, where the roads and lower lands suffer from pluvial flooding from the slopes of Knocknarea.
- d. The Enterprise Park should be screened with indigenous trees, to soften its visual impact.

- e. No damage to the streetscape of the old village of Carnadough should be allowed, either by permitting development or by widening the existing road. Traffic ramps, speed limits and street lighting should be provided.
- f. There should be a “proactive policy” to preserve and renew existing vernacular buildings which are not protected structures.
- g. New development should retain original townland names.
- h. Heritage features such as stone walls, stiles, field gate pillars and stone-walled wells should be protected from further damage.

### **Opinion**

- a. It is outside the remit of the planning authority to extend the boundaries of a Zone of Archaeological Potential (ZAP). The maps which show the location and boundaries of ZAPs are statutory documents to which the Council must adhere.

However, the Council would have no objection to the extension of the Zone of Archaeological Protection onto the northern slopes of Knocknarea, subject to relevant investigations and subsequent designation by the appropriate authority.

In relation to the provision of a walking map for the area, there are a range of walking routes currently under consideration in the Cuil Irra peninsula, inclusive of the northern slopes of Knocknarea. Upon the completion of this work, mapping will be produced.

Regarding the provision of signage to archaeological monuments, this would only be appropriate in cases where access to same has been agreed with the relevant landowners or where a public right of way exists. Currently no such situation exists in relation to archaeological monuments on the northern slopes of Knocknarea.

- b. In 2005, Sligo County Council purchased a strip of land at Carrowdough, Strandhill. The purpose of the acquisition was to secure public access to the shoreline at Culleenamore Beach. The purchase agreement incorporated a condition requiring the Council to erect a fence to separate the land purchased from that retained by the vendor. Work commenced on the erection of the fence in September 2006. Following representations from members of the public and from elected members, work was suspended to allow for consultation to occur between interested parties. It was argued that the fence being erected would obstruct an alleged public right of way which traversed the retained portion of land. A facilitator was appointed to engage in dialogue between the parties. However, a resolution could not be reached and the legal advice obtained by the Council stated that no prima facie case had been demonstrated that a public right of way has been established at this location. In November 2007, work on the installation of the fence was completed. The Strandhill Mini-Plan cannot address this issue.
- c. The issue of pluvial flooding at Carrowdough and its management are operational matters which will be addressed by the Area Engineer subject to resources being available.
- d. The Enterprise Park developments should be landscaped in accordance with the conditions attached to the respective planning permission. The enforcement of conditions is an operational matter, not one for the Strandhill Mini-Plan.
- e. The old village at Carnadough is located in the designated buffer zone, where no further development may be permitted, with very few exceptions as indicated in **Chapter 13 General mini-plan policies** (Vol. 2 of the CDP). The provision of traffic calming and public lighting is, as stated above, an operational matter directly linked to the amount of funding available to the Area Engineer for local works, which cannot be established through a mini-plan objective.

- f. The Draft Mini-Plan has taken a step forward towards the preservation of vernacular structures by designating a number of “buildings of note”, identified on the Objectives Map, and by including an objective – **44.3.B** – to require their restoration, renovation or incorporation in new developments in a sensitive manner that would contribute to the preservation of the streetscape character.
- g. The CDP already includes a provision to require that the names of new residential developments and roads reflect local place names, particularly townlands or names linked to the landscape, culture, history associated with the area (see Section 12.3.14 on p. 180 of Volume 1 of the CDP).
- h. Section **7.3.2 Protection of non-habitable structures** (p. 105 of the CDP) refers specifically to historic gardens, stone walls, street furniture etc, which make a significant contribution to architectural heritage and are an integral part of the landscape. Policy **P-BH-14** in the same section requires the protection of important non-habitable structures, in cases where these are not already included in the Record of Protected Structures.

### **Recommendation**

No change to the proposed variation.

### **Issue no. 3**

It is requested that the zoning of the land west of Airport Road (pine plantation) be retained

### **Opinion**

Please refer to the Manager’s opinion and recommendation in relation to Submissions 5, 8, 11.

### **Recommendation**

No change to the proposed variation.

### **Issue no. 4**

It is suggested that an implementation schedule be attached to the mini-plan, in order to indicate the time horizon for completion of specific objectives, such as the provision of a footpath at the Top Road.

### **Opinion**

As already indicated above, the provision of specific pieces of infrastructure is dependent of funding allocated by the Government. The Strandhill Mini-Plan cannot make funding commitments or establish timeframes for the provision of such infrastructure, in the absence of certainty regarding funding.

### **Recommendation**

No change to the proposed variation.

### **Issue no. 5**

It is also suggested that “period features” within the village be surveyed with community input and be placed on a “protection schedule”.

### **Opinion**

The Planning Section is not currently resourced to engage in non-statutory work (i.e. work not specifically required by legislation). However, should the local community undertake a survey of



period features in the area, the Planning and Heritage officers would be available to contribute to this project, which could result in additional heritage protection objectives in the Strandhill Mini-Plan at the next review of the CDP (due to commence in 2015).

**Recommendation**

No change to the proposed variation.

**Submission no. 10**

4 March 2013

Michael McEnroe

**Issue no. 1**

It is requested that the zoning of the lands to the west of the Airport Road (pine plantation) be retained.

**Opinion**

Refer to the Manager's response to Submissions 5, 8, 11.

**Recommendation**

No change to the proposed variation.

**Issue no. 2**

It is requested that the Council car park (lands zoned for mixed uses) be kept as a car park.

**Opinion**

Refer to the Manager's response to Submissions 6, 9, 12.

**Recommendation**

No change to the proposed variation.

**Submissions no. 13**

5 March 2013

Caroline Brady, Director

on behalf of the Border Regional Authority (BRA)

**Issue no. 1**

The Border Regional Authority welcomes the publication of Strandhill Mini-Plan and the approach of Sligo County Council to incorporate mini-plans into the Sligo County Development Plan. The approach is considered a more efficient way of delivering a sustainable planning framework for County Sligo.

**Opinion**

Noted.

**Recommendation**

No change to the proposed variation.

**Issue no. 2**

The BRA considers that the reports accompanying the proposed variation, prepared in conformity with the Habitats, Floods and SEA Directives, adequately address environmental considerations.

**Opinion**

Noted.

**Recommendation**

No change to the proposed variation.

**Issue no. 3**

The Authority welcomes Section C of the Explanatory Note, but considers that there is a discrepancy in it, namely: there are 14.4 ha required to be zoned in Strandhill up to 2017 and there are 14.4 ha in the Strategic land reserve. “Given that the population forecast up to 2017 for Strandhill is only 471 persons, it is considered that existing vacancies and planning permissions, if realised, can accommodate most, if not all of its future population growth.”

**Opinion**

It is a simple coincidence that the lands placed in the Strategic Land Reserve amount to the same figure of 14.4 ha as the area of greenfield land suitable for multi-unit housing development in Strandhill, as allocated by the Core Strategy of the CDP.

It is accepted that existing vacancies and permitted units, if realised, could accommodate most or all future population growth in Strandhill up to 2017. However, it is not clear whether there is a demand for the existing vacant units (both apartments and houses, many of which serve the tourist market) or whether extant planning permissions will be implemented. It is considered that the CDP allocation of 14.4 ha of greenfield residential land will provide sufficient choice of location for prospective developers once the moratorium on multi-unit housing schemes is suspended.

**Recommendation**

No change to the proposed variation.

**Issue no. 4**

The Regional Authority recommends the inclusion of relevant text or a table in the Mini-Plan “summarising the amount of land required for the plan period, the amount in strategic land reserve and cross reference with the relevant planning policy of the Sligo CDP. For the purposes of clarity, residential uses should be categorised into existing and proposed residential uses so that it is clear as to which fields the c14 ha are zoned for residential uses during the plan period”.

**Opinion**

A table as suggested already exists in the Explanatory Note, although it does not include a breakdown of the land zoned for residential uses into existing residential and greenfield land.

It is proposed to insert a paragraph in the introductory narrative of the Mini-Plan, under the heading Population and Housing, which would explain the zoning.

The Zoning Map makes it clear which greenfield lands are zoned for residential uses during the plan period, since the existing built-up area is represented through the layout of housing estates.

## Recommendation

Under the heading **Population and housing** (p. 1 of the Draft Mini-Plan), include the following paragraph:

*The Core Strategy of the CDP allocated to Strandhill 14.4 ha of greenfield land, which included (in 2012-2013) 4.03 ha of land with existing planning permission for residential development, comprising some 204 potential residential units. This equates to 10.37 ha which have been zoned for residential development in this Mini-Plan. Mixed-use lands are also included in the allocation based on an average of 65% residential development in the mix of uses.*

The introduction of the above explanatory paragraph would not be a material amendment of the proposed variation.

## Issue no. 5

Given the sensitive location of the village, the BRA recommends “that the objectives of the mini-plan include reference to the DECLG Guidelines for Planning Authorities – Sustainable Development in Urban Areas (Cities, Towns and Villages)”.

## Opinion

It is agreed to include a reference to the DECLG guidelines as suggested by the Regional Authority and also include a reference to the DoT/DECLG Design Manual for Urban roads and Streets (2013).

## Recommendation

In **Section 44.4 Mixed-use zones**, modify **objective 44.4.B** as follows (addition in blue):

*Discourage piecemeal, haphazard development and ensure the assembly and consolidated development of lands within the mixed-use zones on the basis of integrated design proposals/masterplans with appropriate pedestrian/cycle/vehicular links. Prospective developers shall have regard to the DECLG’s Guidelines for Planning Authorities – Sustainable Development in Urban Areas (Cities, Towns and Villages) and to the DoT/DECLG Design Manual for Urban roads and Streets (2013).*

The introduction of the above wording would not be a material alteration (amendment) of the proposed variation.

## Submissions no. 14

5 March 2013

Patrick and Niall Carty

## Issue no. 1

P. and N. Carty request that a site at Carrowbunnaun (marked 14 on the Submissions Map) retain its residential zoning in the Mini-Plan for Strandhill.

The submission is accompanied by a planning report prepared by Rhatigan and Company Architects in March 2011 and a Residential Assessment Report prepared by Colm McLoughlin in February 2012 (in support of the planning application PL 11/61 – refused on appeal).

The planning report states that, while large land banks cannot be developed in the short to medium term, due to financial constraints, P. and N. Carty actively seek to develop the lands, as they consider that there is a low level of housing available in the Strandhill area (refers to 2011).

The Residential Assessment report indicates that Strandhill has extremely low levels of residential vacancy and a high demand for housing, particularly three- and four-bedroom semi-detached and detached units.

**Opinion**

In order to comply with the requirements of the Core Strategy, which allocated 14.4 ha of greenfield residential land to Strandhill for the period up to 2017, it was necessary to change the zoning designation of various fields within the plan area, starting with the more peripheral lands.

While it is acknowledged that the site subject to this submission has good potential for the future expansion of Strandhill's residential stock, it has been included in the Strategic Land Reserve for the lifetime of the current CDP, as there are other lands in Strandhill, located close to the village core and with better access to the existing road infrastructure.

It must be noted that residential vacancy in Strandhill is estimated to be around 120 units (both houses and apartments – as surveyed by the Planning Section in 2012), which is not considered particularly low.

**Recommendation**

No change to the proposed variation.

**Submission no. 15**

5 March 2013

Michael Connolly

**Issue no. 1**

Michael Connolly, the owner and operator of a surf school in Strandhill, supports the retention of mixed-use zoning for the area between the Council car park and the seafront/Promenade.

**Opinion**

Noted.

**Recommendation**

No change to the proposed variation.

**Submission no. 16**

5 March 2013

Noel O'Connor

on behalf of the Department of Agriculture, Food and the Marine

**Issue no. 1**

The Department of Agriculture, Food and the Marine has no comments or observations in relation to the Draft Strandhill Mini-Plan.

**Opinion**

Noted.

**Recommendation**

No change to the proposed variation.

**Submission no. 17**

5 March 2013

Michael Keane and Mick McEnroe  
on behalf of Strandhill Community Development Association

**Issue no. 1**

M. Keane supports the local community's request to retain the zoning of the lands to the west of the Airport Road (pine plantation).

**Opinion**

Noted. Please refer to the Manager's response to Submissions 5, 8, 11.

**Recommendation**

No change to the proposed variation.

**Issue no. 2**

It is requested that the Council car park (lands zoned for mixed uses) be kept as a car park and that it be identified as a "transport facility – 'car park' with recreational facility only".

**Opinion**

Refer to the Manager's response to Submissions 6, 9, 12.

**Recommendation**

No change to the proposed variation.

**Submission no. 18**

5 March 2013

Seamus F. Maye

**Issue no. 1**

S. Maye requests that a submission dated 6 January 2003 and 30 April 2003 be "included as part of the Council's public consultation in relation to Chapter 44 of the County Sligo Development Plan 2011-2017".

**Opinion**

The 2003 consultation was conducted in relation to the preparation of a Local Area Plan for Strandhill. The submissions of 2003 were addressed at the time in the relevant Manager's Reports.

The recent consultation related to a different proposal – a Mini-Plan that will be incorporated into the County Development Plan 2017-2017. It is considered that the 2003 submissions are not relevant for the Draft Strandhill mini-Plan, as they do not address the proposals that have been on public display.

**Recommendation**

No change to the proposed variation.

## **Issue no. 2**

The submission states that a long-term plan is needed in relation to tackling coastal erosion and that a promenade extension along the full length of the beach is worthy of consideration as it “would provide long-term certainty/security for the beach, golf club, surfing, walking and of the dunes”.

### **Opinion**

Section **10.2.2 Coastal protection** (p. 151-153 of the CDP) contains policies and objectives relevant to the issue of coastal erosion raised in this submission.

Objective **O-CP-2** indicates the Council’s intention to identify, prioritise and implement coastal protection works within the coastal zone that are considered necessary, subject to availability of resources.

It is not considered necessary to insert an additional objective in the Strandhill Mini-Plan that would only reiterate the requirements of **O-CP-2**.

In relation to the Promenade extension, it is considered that objective **44.5.C** is adequate and sufficient. Any further extension of the Promenade to the north or south would require substantial coastal defence works and might damage the sensitive natural environment. It is considered that the walking routes identified on **Map 3 Transport Objectives** already ensure access to the beach and the dunes.

### **Recommendation**

No change to the proposed variation.

## **Issue no. 3**

S. Maye considers that “abandoning” the “original site” chosen locally for a community centre would create financial difficulties for the community, as the alternative site is privately owned.

### **Opinion**

Please refer to the Manager’s response to Submissions 5, 8, 11. Land ownership and the cost of land acquisition are not planning matters that can be addressed in the Strandhill Mini-Plan.

### **Recommendation**

No change to the proposed variation.

## **Submission no. L-1**

8 March 2013

Patricia O’Leary  
on behalf of the Development Applications Unit,  
Department of Arts, Heritage and the Gaeltacht

This **late submission** relates to archaeology. It is considered that Chapter 7 of the CDP ensures adequate and sufficient protection to archaeological heritage



# Draft Strandhill Mini-Plan Submissions Map

5, 6, 7, 8, 9, 10, 11, 12 & 17

6, 9, 10, 12, 15 & 17

14

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