# Second Chief Executive's Report

on submissions and observations received in relation to the

# **Proposed Amendments**

to the Draft Enniscrone Local Area Plan 2014-2020

1 September 2014

Sligo County Council Development PlanningUnit

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#### 1. Introduction

Sligo County Council commenced the review of Enniscrone LAP 2004-2013 in January 2014, with a period of pre-draft consultation, after which 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.

On 27 June 2014, the First Chief Executive's Report was submitted to those members of Sligo County Council who are also members of the Ballymote-Tobercurry Municipal District.

At their meeting of 10 July 2014, the members of the Ballymote-Tobercurry Municipal District considered the Draft LAP and the First Chief Executive's Report and resolved to propose an amendment to the Draft Plan.

## 2. Proposed amendment to the Draft LAP

The members resolved to propose an amendment which had implications on zoning and on transport objectives (refer to Section 2 of this document). This proposed amendment was separated into several amendments: an amendment to the Zoning Map, an amendment to the Transport Objectives Map and corresponding amendments to the text (narrative and objectives) of the Draft LAP.

# 3. Strategic environmental assessment of the proposed amendments

The Draft LAP was accompanied by a Strategic Environmental Assessment (SEA) Screening Report, which described the characteristics and assessed the expected effects of implementing the LAP, based on the criteria set out in Schedule 2A of the SEA Regulations 2004.

The conclusion of the Screening Report was that the proposed LAP would not have significant effects on the environment and, accordingly, a full SEA (involving the preparation of an Environmental Report) was not required.

Following the resolution to amend the Draft Enniscrone LAP 2014-2020, the potential for significant environmental effects of the proposed amendments was assessed in the **Addendum to the SEA**Screening Report relating to the Draft LAP.

The conclusion of the assessment was as follows:

It is the opinion of the Planning Authority that the proposed amendments to the Draft Enniscrone LAP 2014-2020, if adopted, would not change the conclusion of the initial SEA Screening Report or that of the Habitats Directive Assessment Screening Statement.

#### Consultation with prescribed environmental authorities

On 28 July 2014, the Addendum was referred to the prescribed environmental authorities, of which only the Environmental Protection Agency (EPA) responded as summarised below.

It is noted that the surface water quality of the Bellawaddy River, adjacent to the site of proposed amendment A-1, was classified as being of moderate status (Q 3-4) by the EPA in 2013. In addition, the Geological Survey of Ireland has identified high groundwater vulnerability in the area. The intention to provide a minimum of 100 soft landscaped car parking spaces is noted. It should, however, be ensured that the water quality of the area is protected in the implementation of the proposed amendments.

#### Future Amendments to the Draft Plan

It is a matter for Sligo County Council to determine whether or not any future proposed amendments / variations would be likely to have significant effects on the environment. This assessment should take account of the SEA Regulations Schedule 2A Criteria (S.I. No. 436 of 2004).

#### Infrastructure Planning

In proposing the Plan, and any related amendments variations etc. of the Plan, and 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.

# 4. Public consultation on the proposed amendments

The proposed amendments were placed on public display for four weeks, from 16 July to 13 August 2014. Ten submissions were received during this period and one was received on 19 August (see table below).

# List of persons and organisations that made submissions in relation to the proposed amendments to the Draft Enniscrone LAP 2014-2020

Ref. no.	Date received	Name or agency	On behalf of (where applicable)	Address
1	05/08/2014	Cian O'Mahony, Scientific Officer	Environmental Protection Agency (EPA)	SEA Section, Office of Environmental Assessment, Regional Inspectorate, Inniscarra, Co. Cork
2	11/08/2014	Derek Trenaman, Ceardan Ltd	David McGowan	e-mail
3	12/08/2014	Patricia Calleary, Planning Specialist	John Casey, Asset Strategy and Sustainability Manager, Irish Water	e-mail
4	13/08/2014	Richard Coleman		Muckduff, Enniscrone, Co. Sligo
5	13/08/2014	Mary Comey		e-mail
6	13/08/2014	Carmel Hannan		e-mail
7	13/08/2014	Vera Hannon		Muckduff, Enniscrone, Co. Sligo
8	13/08/2014	Seamus and Alice Higgins		Bartragh, Enniscrone, Co. Sligo
9	13/08/2014	Frances Dunne, Corporate Support Unit, DCENR	John Conneely, Director, Inland Fisheries Ireland	e-mail
10	13/08/2014	Padraig Melvin		Muckduff, Enniscrone, Co. Sligo
L-1 (late)	19/08/2014	Michael Murphy, Development Applications Unit DAHG		e-mail

# 5. Adoption of the local area plan

The Manager has responded to each submission individually and made appropriate recommendations.

At their meeting of 15 September 2014, which will be the final stage in the LAP adoption process, the members of the Ballymote-Tobercurry Municipal District must consider the Draft LAP, the Proposed Amendments, the SEA Screening Report and its Addendum together with the Second Manager's Report (this report).

The Members may decide to adopt the LAP with all, some or none of the Proposed Amendments. **However, no new material alterations can be made at adoption stage**.

The Planning and Development Act 2000 (as amended) provides the following in **Section 19 Application and content of a local area plan**:

- (2) A local area plan shall be consistent with the objectives of the development plan, its core strategy, and any regional planning guidelines that apply to the area of the plan and shall consist of a written statement and a plan or plans which may include:
  - (a) objectives for the zoning of land for the use solely or primarily of particular areas for particular purposes, or
  - (b) such other objectives in such detail as may be determined by the planning authority for the proper planning and sustainable development of the area to which it applies, including the objective of development of land on a phased basis and detail on community facilities and amenities and on standards for the design of developments and structures.
- (2B) Where any objective of a local area plan is no longer consistent with the objectives of a development plan for the area, the planning authority shall as soon as may be (and in any event not later than one year following the making of the development plan) amend the local area plan so that its objectives are consistent with the objectives of the development plan.

Please also note the following paragraph extracted from **Section 20 Consultation and adoption of local area plans**, introduced into 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.

# 6. Response to submissions on proposed amendments

**Submission no. 1** 5 August 2014

Cian O'Mahony, Scientific Officer, SEA Section on behalf of the Environmental Protection Agency (EPA)

The submission received from the Environmental Protection Agency (EPA) relates both to the proposed amendments to the Draft Enniscrone Local Area Plan 2014-2020 (LAP) and to the Addendum to the SEA Screening Report prepared in conjunction with the Draft LAP.

#### Issue no. 1

The EPA notes the Planning Authority's position with regard to the need for Strategic Environmental Assessment (SEA) of the proposed amendments to the Draft Enniscrone LAP.

#### **Opinion**

Following the resolution to amend the Draft Enniscrone LAP 2014-2020, the potential for significant environmental effects of the proposed amendments was assessed in the **Addendum to the SEA**Screening Report relating to the Draft LAP.

The conclusion of the assessment was as follows:

It is the opinion of the Planning Authority that the proposed amendments to the Draft Enniscrone LAP 2014-2020, if adopted, would not change the conclusion of the initial SEA Screening Report or that of the Habitats Directive Assessment Screening Statement.

Following the adoption of the LAP, with or without any or all of the proposed amendments, the Addendum to the SEA Screening Report will be updated to reflect the contents of the final version of the LAP.

#### Recommendation

No action required.

#### Issue no. 2

The Agency indicates that "the surface water quality of the Bellawaddy River, adjacent to the site of Proposed Amendment A-1, was classified as being of Moderate status (Q 3-4) by the EPA in 2013. In addition, the Geological Survey of Ireland has identified high groundwater vulnerability in the area. The intention to provide a minimum of 100 soft landscaped car parking spaces is noted. It should, however, be ensured that the water quality of the area is protected in the implementation of the Proposed Amendments".

#### **Opinion**

Water quality in the Enniscrone LAP area is protected through the CDP relevant policies and also through the **water quality policies** included in the Draft LAP (Section **10.1 Water quality** – p. 88-89 of the Draft LAP).

#### Recommendation

No action required.

#### Issue no. 3

The EPA states that "it is a matter for Sligo County Council to determine whether or not any future proposed Amendments/Variations would be likely to have significant effects on the environment. This assessment should take account of the SEA Regulations Schedule 2A Criteria (S.I. No. 436 of 2004).

#### **Opinion**

Noted.

#### Recommendation

No action required.

#### Issue no. 4

The Agency recommends that "in proposing the Plan, and any related amendments, variations etc. of the Plan, and 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**

The Draft Enniscrone LAP includes appropriate policies and objectives for the provision of physical and social infrastructure to serve the needs of the current and future population of the Plan area, in accordance with the Core Strategy and general policies of the County Development Plan.

Under the Planning and Development Act 2000 (as amended), the Planning Authority has a statutory obligation to secure the implementation of development plan objectives. However, the implementation of objectives may be constrained by factors such as the economic climate, political support, allocated local authority funding and the capital investment programmes of other organisations (such as Irish Water).

Although no funding of infrastructure can be guaranteed in advance, it is the intention of Sligo County Council to exercise all legal powers to ensure that the relevant objectives are implemented.

#### Recommendation

No action required.

Submission no. 2 11 August 2014

Derek Trenaman, Registered Architect, Ceardan Ltd on behalf of David McGowan

#### Issue no. 1

The submission welcomes the proposed amendment A-1 (change of zoning from 'transport node and car parking' to 'tourism-related uses').

#### **Opinion**

The proposed amendment A-1 reads as follows:

#### A-1

Change the zoning of the **site marked A-1** (the grey area outlined in black on the map below, excluding the green circle which represents a zone of archaeological potential) from 'transport node and car parking' to 'tourism-related uses' (brown colour, similar to the area immediately to the south).



The Core Strategy contained in the County Development Plan designates Enniscrone as a Key Support Town with a special tourism function. "Glamping" is a niche type of tourism, which has not been developed in County Sligo so far.

It is considered that the proposed use for the site subject to amendment A-1 is appropriate to the location and is complementary to the existing caravan park. The details regarding the exact location of the car parking area in relation to the access road and the existing houses can be decided at planning application stage.

From an environmental perspective, the impact of the proposed "tourism-related uses" would be less significant than the impact of the initial "transport node and car parking" zoning objective, as the tourism-related use, as described by the landowners who made the submission leading to this proposed amendment, would consist of a caravan/camping/"glamping" area.

This area is intended to be mostly soft-landscaped, as opposed to the hard surface required for a car parking area. It is considered that the impact of a soft-landscaped area on the receiving environment would be lower than that of a hard-landscaped area.

The proposed change of zoning does not extend into the area at risk of flooding, which adjoins the Bellawaddy River, and does not affect the zone of archaeological potential surrounding the monument SL016-085.

This amendment, if adopted, would not change the conclusion of the initial SEA Screening.

The Habitats Directive Assessment Screening Statement predicted "no impacts" in relation to the tourism objective "caravan park" (objective TOO-4). Extending this zoning objective as required by the proposed amendment A-1 would not affect the nearby Natura 2000 areas. Therefore the proposed amendment A-1, if adopted, would not change the conclusion of the initial Habitats Directive Assessment Screening.

#### Recommendation

There is no objection to the proposed amendment A-1.

#### Issue no. 4

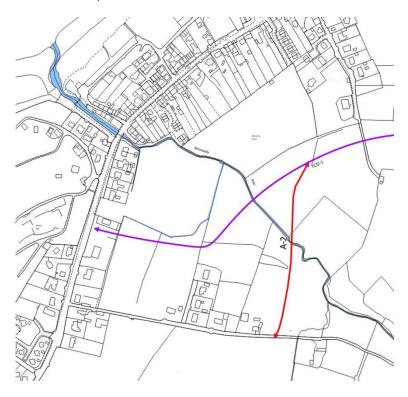
The submission welcomes the proposed amendment A-2 (modification of the link road required by objective TCO-1 by routing its southern extremity to connect with the local road L-26027-0 instead of the regional road R-297).

#### **Opinion**

The proposed amendment A-2 reads as follows:

#### **A-2**

On **Map 10 Transport and circulation objectives**, modify the link road required by objective TCO-1 by routing its southern extremity to connect with the local road L-26027-0 instead of the regional road R-297, as shown in **RED** on the map extract below.



It is considered that the route proposed under the amendment A-2 would require the upgrading of the local road, involving additional land take and resulting in a longer stretch of road overall from start to finish, thus leading to higher costs associated with the project. In order to increase the likelihood of the link road being constructed, it is necessary to minimise costs from an early stage. Hence, it is imperative that the shortest, most direct route is found, through undeveloped sites where possible.

Therefore, it is preferable to retain the route originally proposed in the Draft LAP.

#### Recommendation

The proposed amendment A-2 should not be adopted.

Submission no. 3 12 August 2014

Patricia Calleary, Planning Specialist on behalf of John Casey, Asset Strategy and Sustainability Manager, Irish Water

#### Issue no. 1

Irish Water (IW) highlights the "significant water capacity issues during peak demand in the summer period in Enniscrone", resulting from "constraints in yield of the source". IW indicates that future improvement of the water supply to the area is likely to require "a bulk transfer from another supply zone".

IW recommends that the proposal for additional tourist-related uses should be considered "in the context of the current lack of a secure long-term water supply".

#### Issue no. 2

In relation to wastewater treatment, IW indicates that "there is a significant summer/winter p.e. variation loading and the [Enniscrone wastewater treatment] plant can become overloaded in peak tourism summer events, e.g. festivals, and for short periods of very good weather".

IW recommends that that the proposal for additional tourist-related uses should be considered "in the context of the current lack of the current capacity issues at the treatment plant on occasions during the summer season".

#### Issue no. 3

IW notes that Enniscrone is not listed in Irish Water's current (three-year) Capital Investment Plan for investment in either water or wastewater infrastructure.

#### Issue no. 4

IW states that it will "work with Sligo County Council in the implementation of the Enniscrone Local Area Plan when finalised, to ensure that investment in water services infrastructure underpins proper planning and sustainable development of the area".

#### **Opinion**

In the Spatial Development Framework included in the County Development Plan 2005-2011, Enniscrone was designated a Key Support Town with a special tourism function. This designation was confirmed in the Core Strategy included in the County Development Plan 2011-2017.

As required by the Planning and Development Act 2000 (as amended), the two successive CDPs mentioned above have been consistent with the provisions of the National Spatial Strategy and those of the Border Regional Planning Guidelines.

Enniscrone's designation as a Key Support Town for the last decade (2005-2014) has played a substantial role in securing investment in water and wastewater infrastructure, in line with the Council's goal of increasing Enniscrone's capacity to attract and retain permanent residents, as well as tourists, in accordance with the town's special function.

It is noted that the Section 33(5) of the Water Services (No. 2) Act 2013 requires Irish Water to prepare a *water services strategic plan* (WSSP) which should be consistent ("as far as practicable") with the National Spatial Strategy, regional planning guidelines and have regard to proper planning and sustainable development.

Furthermore, the Issues Paper published by Irish Water to facilitate public consultation on its first WSSP indicates that the WSSP must have regard to "proper planning and sustainable development at a county and local level". The Issues Paper also states that "Irish Water considers that supporting balanced social and economic growth is a key objective that needs to be addressed in the making of the plan [i.e. WSSP]."

Having regard to the above, it is considered that Irish Water should ensure that any necessary infrastructure upgrades are planned and provided in advance of development taking place, in order to support current and future population and economic growth in Enniscrone, in accordance with the Core Strategy of the County Development Plan 2011-2017, and the policies and objectives contained in the CDP and the Enniscrone Local Area Plan 2014-2020.

While Enniscrone is not listed in Irish Water's current (three-year) Capital Investment Plan for investment in either water or wastewater infrastructure, it is considered that Irish Water should make appropriate provisions for future investment in Enniscrone, since the company is fully aware of the existing deficiencies. The lack of such investment would clearly undermine the proper planning and sustainable development of the town.

#### Recommendation

No change to the Draft LAP or the proposed amendments on foot of this submission.

#### Submission no. 4

13 August 2014

Richard Coleman

#### Issue no. 1

The submission objects to the proposed amendment A-2 (modification of the link road required by objective TCO-1 by routing its southern extremity to connect with the local road L-26027-0 instead of the regional road R-297).

R. Coleman is concerned that the route proposed under the amendment A-2 would require additional land at the junction with the R-297 (either his land or that of his neighbour). He states that the modified route would require the upgrading of the existing road and would therefore be more expensive to construct.

Sightlines are already restricted at the junction of the R-297 and the L-26027-0. Increased traffic at this junction could result in a traffic hazard and endanger public safety.

R. Coleman contends that a new road to the side and rear of his property would have a negative impact on the value of the property and on the quality of life currently enjoyed by his family.

#### **Opinion**

The concerns expressed in the submission are acknowledged.

It is considered that the route proposed under Amendment A-2 would indeed require the upgrading of the local road, involving additional land take and resulting in a longer stretch of road overall from start to finish, thus leading to higher costs associated with the project.

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

Therefore, it is preferable to retain the route originally proposed in the Draft LAP.

#### Recommendation

The proposed amendment A-2 should not be adopted.

#### Issue no. 2

The submission opposes the change of zoning proposed under the amendment A-1. It is stated that there is a caravan/camping park in Enniscrone and that the proposed extension of the area zoned for tourism-related uses is not required.

R. Coleman is concerned that "the only site suitable to meet the car parking requirements" is proposed to be re-zoned without considering an alternative site for car parking. It is contended that a glamping site with an integrated 100-space-car park is not realistic and will not be developed.

#### **Opinion**

The Core Strategy contained in the County Development Plan designates Enniscrone as a Key Support Town with a special tourism function. "Glamping" is a niche type of tourism, which has not been developed in County Sligo so far.

It is considered that the proposed use for the site subject to amendment A-1 is appropriate to the location and is complementary to the existing caravan park.

An alternative site for the car parking facility is not required, due to the objective to provide 100 publicly-accessible car parking spaces on the site.

The integration of glamping and car parking is feasible, as the parking area is intended to be soft-landscaped and used mostly as an overflow car park on peak summer days.

The impact of a soft-landscaped area on the receiving environment would be lower than that of a hard-landscaped car parking area. Therefore, from an environmental perspective, the proposed zoning change would be positive.

The details regarding the exact location of the car parking area in relation to the access road and the existing houses will be decided at planning application stage.

#### Recommendation

There is no objection to the proposed amendment A-1.

#### Submission no. 5

13 August 2014

Mary Comey

#### Issue no. 1

The submission objects to the proposed amendment A-2 (modification of the link road required by objective TCO-1 by routing its southern extremity to connect with the local road L-26027-0 instead of the regional road R-297).

M. Comey is concerned that the road will severely impinge upon and devalue property along the L-26027-0, will cause noise pollution and will result in a traffic hazard to resident families.

The submission states that it is highly unlikely that the development will occur in the short to medium term and therefore it is premature to plan for this road and restrict other development opportunities along the local road.

#### **Opinion**

The concerns expressed in the submission are acknowledged. Please refer to the Chief Executive's response to Issue no. 1 of Submission no. 4.

#### Recommendation

The proposed amendment A-2 should not be adopted.

### Submission no. 6

13 August 2014

Carmel Hannan

#### Issue no. 1

The submission objects to the proposed amendment A-2 (modification of the link road required by objective TCO-1 by routing its southern extremity to connect with the local road L-26027-0 instead of the regional road R-297).

C. Hannan is concerned that the road will severely impinge upon and devalue the property along the L-26027-0, will cause noise pollution and a traffic hazard to resident families as well as negatively impacting upon one of the few wild valleys left in the area.

#### **Opinion**

The concerns expressed in the submission are acknowledged. Please refer to the Chief Executive's response to Issue no. 1 of Submission no. 4.

#### Recommendation

The proposed amendment A-2 should not be adopted.

#### Submission no. 7

13 August 2014

Vera Hannan

#### Issue no. 1

The submission objects to the proposed amendment A-2 (modification of the link road required by objective TCO-1 by routing its southern extremity to connect with the local road L-26027-0 instead of the regional road R-297).

V. Hannan is concerned about the implications of the road proposal on her family in terms of traffic safety, possible land take required for the road, the restrictive effects of a preservation corridor, decreased quality of life and increased noise and pollution levels. The submission also expresses concerns regarding the negative effect the road may have on the value of her property and the removal of hedgerows in the area.

#### **Opinion**

The concerns expressed in the submission are acknowledged. Please refer to the Chief Executive's response to Issue no. 1 of Submission no. 4.

#### Recommendation

The proposed amendment A-2 should not be adopted.

### Submission no. 8

13 August 2014

Seamus and Alice Higgins

#### Issue no. 1

The submission objects to the proposed amendment A-2 (modification of the link road required by objective TCO-1 by routing its southern extremity to connect with the local road L-26027-0 instead of the regional road R-297).

S. and A. Higgins consider that the "intensification of the junction" of the L-26027-0 and the R-297 would exacerbate the traffic problems already experienced at this location. The difficulties caused to pedestrians by increasing traffic flow onto the R-297, in an area lacking a footpath, are also highlighted.

#### **Opinion**

The concerns expressed in the submission are acknowledged. Please refer to the Chief Executive's response to Issue no. 1 of Submission no. 4.

#### Recommendation

The proposed amendment A-2 should not be adopted.

#### Issue no. 2

It is stated that there is no need for a by-pass of Enniscrone, as the town experiences traffic congestion only at peak summer periods. Congestion is caused by the lack of car parking facilities in the town and addressing the car parking issue would be more important than a by-pass.

#### Opinion

The road for which objective TCO-1 reserves a corridor is not meant to serve as a bypass of Enniscrone.

Section **8.2.2.** New roads (p. 73 of the Draft LAP) indicates that "in order for the town to develop in a consolidated manner, a network of auxiliary roads is required to open up the backlands for development".

The purpose of objective TCO-1 is not to relieve traffic congestion, but to ensure that the future growth of Enniscrone will take place in a planned, orderly manner, as opposed to piecemeal development.

#### Recommendation

The proposed amendment A-2 should not be adopted.

#### Issue no. 3

The submission states that there is a caravan/camping park in Enniscrone. An additional facility will detract from the existing park and is not required.

#### **Opinion**

The Core Strategy contained in the County Development Plan designates Enniscrone as a Key Support Town with a special tourism function. "Glamping" is a niche type of tourism, which has not been developed in County Sligo so far.

It is considered that the proposed use for the site subject to amendment A-1 is appropriate to the location and is complementary to the existing caravan park.

#### Recommendation

There is no objection to the proposed amendment A-1.

Submission no. 9 13 August 2014

Frances Dunne, Corporate Support Unit, DCENR on behalf of John Conneely, Director, Inland Fisheries Ireland (IFI)

#### Issue no. 1

Inland Fisheries Ireland (IFI) requests that "a clear span bridge" is used for the proposed/amended road crossing (objective TCO-1) of the Bellawaddy River, which provides a high-quality habitat for brown trout and sea trout. The agency states that "IFI must be consulted in relation to all riparian and in-stream works with method statements being provided for approval one month prior to works commencing on site".

#### **Opinion**

The objective TCO-1 seeks to reserve a corridor for future roads, including a link road to the south of the R-297, which would cross the Bellawaddy River. The modification of the route of this link, as proposed under the amendment A-2, also crosses the Bellawaddy River but at a different point, located to the south-east of the originally proposed route. The design details of the future road bridge over the Bellawaddy River are outside the scope of the LAP. However, the IFI is a statutory body and any significant works requiring planning permission or a Part 8 will be referred to the IFI.

#### Recommendation

No action required.

#### Issue no. 2

IFI indicates that "all surface waters from the car park proposed in objective TCO-9 and the proposed new road must pass through oil interceptors and silt collection sumps before being discharged" and that "all discharges to surface waters must be via attenuation ponds".

#### **Opinion**

Noted. Please refer to the Chief Executive's opinion on Issue no. 1 of this submission.

#### Recommendation

No action required.

#### Issue no. 3

IFI recommends the establishment of a buffer zone of a minimum 5-m width to protect the aquatic habitat along the stream flowing through the site marked A-1.

#### **Opinion**

In Section **7.1 Natural heritage** (p. 53-62 of the Draft LAP), the natural heritage policy **NHP-7** already makes provision for the protection of water quality in rivers and streams by restricting development in Core Riparian Zones (CRPs), which "should be generally 10-m-wide on each side of rivers". This policy is considered sufficient for the protection of the aquatic habitat along the stream that crosses the lands subject to the proposed amendment A-1.

#### Recommendation

No change to the Draft LAP or the proposed amendments on foot of this submission.

Padraig Melvin

#### Issue no. 1

The submission objects to the proposed amendment A-2 (modification of the link road required by objective TCO-1 by routing its southern extremity to connect with the local road L-26027-0 instead of the regional road R-297).

The submission also states that the county road is not capable of dealing with additional traffic without significant road improvements. Substantial infill works would be required to accommodate the proposed road on account of the contours of the land through which the road would be traversing.

#### **Opinion**

The concerns expressed in the submission are acknowledged. Please refer to the Chief Executive's response to Issue no. 1 of Submission no. 4.

#### Recommendation

The proposed amendment A-2 should not be adopted.

### 7. Chief Executive's overall recommendation

The Chief Executive acknowledges the objections of local residents to the proposal to re-route the road reservation subject to objective TCO-1(A) and considers that the road reservation should not be modified. The Chief Executive has no objection to the change of zoning and the modification of objective TCO-9 proposed under amendments A-1, A-4 and A-6.

It is recommended that the members of the Ballymote-Tobercurry Municipal District adopt the Draft Enniscrone Local Area Plan 2014-2020 with the material changes proposed under amendments A-1, A-4 and A-6.

The proposed amendments A-2, A-3 and A-5 (relating to road reservation re-routing) should NOT be adopted.