



An
Bord
Pleanála

Inspector's Report ABP.315088-22

Development	Construction of glamping site with 15 glamping pods, office, car parking, LPG gas tanks and enclosures, refuse enclosures and all ancillary services.
Location	Killarney Racecourse, Ross Road, Bunrower, Killarney
Planning Authority	Kerry County Council
Planning Authority Reg. Ref.	22/68
Applicant(s)	Killarney Glamping
Type of Application	Planning permission
Planning Authority Decision	Grant permission s.t. conditions
Type of Appeal	Third party
Appellant(s)	Anthony McManus & Alison Cooper Castlefalls Residents Association Muireann O'Shea & Tom Quille Patricia Mangan Martin & Kate Mulvihill
Observer(s)	Fergus Houlihan

Ross Castle Grove Management
Company

Ross Golf Club

Date of Site Inspection

4th August 2023

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Appendix 1 – Form 1: EIA Pre-Screening

1.0 Site Location and Description

- 1.1.** Killarney Racecourse is located on Ross Road in Killarney Town, approx.1.2km to the southwest of the Town Centre. Ross Road branches off Flesk Road/Muckcross Road and provides access to several small housing estates, the racecourse and the National Park, including Ross Castle and the associated demesne. The Racecourse grounds (stated to be c.90acres) includes several other uses within it including a Driving Test Centre, a Golf Club comprising a 9-hole golf course with an associated bar and restaurant, and a number of other activities and events such as yoga classes, music classes, exhibitions and conferences. The racecourse circuit is oval shaped, and it encircles the golf course, which is located on the lands within the racecourse grounds. The site of the proposed glamping is located on part of the existing golf course, at its northern end, within the racecourse circuit.
- 1.2.** Access to the Racecourse is from Ross Road at the northern tip of the grounds. Ross Road lies to the west of the racecourse grounds, and a stone wall and hedging defines the boundary. There is a vehicular access to the grounds for maintenance purposes. There are two housing estates on the western side of the road, 'Ross Castle Grove' and 'Ross Avenue'. To the east of the racecourse grounds, there is a housing estate, 'Castle Falls', which is accessed by means of a short cul-de-sac, which branches off Ross Road. There are two further housing estates, 'The Priory' and 'Cahernane Meadows' located further to the south and east of Castle Falls.
- 1.3.** There are a number of buildings in the north-eastern section of the racecourse site. These include the Driving Test Centre, viewing stands, a bar/venue facility, a function room, stables and yards, changing facilities for jockeys, offices and meeting rooms. There is also an entertainment venue which is enclosed within the base of one of the viewing stands, which has been used for other entertainment purposes such as a theatre and for the show "Celtic Steps". Parking is provided on site for cars and buses, which are mainly located at the northern end near the entrance and in the vicinity of the function rooms and stands. There is an internal access road leading from the bus/car park near the main entrance to the maintenance entrance off Ross Road.

2.0 Proposed Development

- 2.1.** Permission is sought to provide a glamping site comprising 15 glamping pods at the northern end of the golf course, within the racecourse circuit. Access to the glamping site is proposed from the existing entrance off Ross Road and through the existing internal service road. It is also proposed to provide car parking, an office, refuse storage and an LPG tank with enclosure. A lighting scheme was submitted with FI. The proposal involves alterations to the golf course, which will remain, by means of redesigning the northern section of the golf course. This will involve relocating two holes, which it is stated, will be carried out as part of the golf course maintenance and management works.
- 2.2.** Three parking areas are proposed on the perimeter of the glamping site, with 5 spaces, 7 spaces and 10 spaces, respectively. These car parks are located to the north-west, the south-west and the north-east, respectively. They will be accessed via the racetrack service road which bounds the perimeter of the site to the west, north and east. A perimeter fence will bound the inside of the service road and parking areas. Gravel paths will be introduced linking the glamping pods and the proposed parking areas will have a gravel surface. 'Activity Areas' (i.e., green open space recreational areas) are proposed at the northern end and alongside the racetrack to the east.
- 2.3.** The glamping pods will be installed onto foundations comprising small strip footings (750mm x 300mm) running just below ground levels with block piers/walls (300-600mm high) to support the glamping pods. Refuse stores will be provided to the rear of the parking areas and an LPG Tank enclosure is proposed adjacent to Car Park 01 (north-west). Water supply and wastewater connections will be made to the existing system serving the racecourse site. Surface water will be collected and discharged to ground via soakaways.
- 2.4.** The application was accompanied by a Landscaping Plan and an Appropriate Assessment Screening Report. It is proposed to plant Hornbeam trees throughout the site and to retain existing shrubs and trees where possible.

3.0 Planning Authority Decision

3.1. Decision

The planning authority decided to **grant** permission subject to 13 conditions, the majority of which were of a standard nature. The following conditions are of note:

- Cond. 2 Development contribution of €12,550 (in accordance with the GDSCS).
- Cond. 3 Design/external finishes in accordance with revised drawings (22/9/22) and the precise colour to be agreed with P.A. prior to the glamping pods being put in place.
- Cond. 5 Glamping pods to be used for short-term holiday letting purposes only.
- Cond. 12 Landscaping (28/01/22) to be implemented with trees of a native Irish species and a minimum height of 1.5 metres and certificate of compliance to be submitted within one year of opening.
- Cond. 13 The proposed development shall be managed and supervised by an individual located on site on a 24-hour basis during periods of occupation of one or more of the glamping pods. A detailed management plan outlining these measures shall be submitted for written agreement of the P.A. within 4 weeks of the date of the decision.

Reason: to regulate and control the use of the development.

3.2. Planning Authority Reports

Planning Reports

- 3.2.1. It was noted that the site is zoned “G4 Active Open Space” in the Killarney Town Development Plan 2009-2015 (as extended), and that Camping/glamping is a use that is ‘Open to consideration’. As such, it was considered that the proposal would be acceptable in principle.
- 3.2.2. The matters raised by third parties were summarised, including submissions from the third-party appellants and observers. In addition, submissions from **An Taisce**, **Killarney Horse and Carriage Tours** and the **Irish Deer Society** were referenced

in the report. The issues raised by the Irish Deer Society and An Taisce related to what was considered to be an inadequate level of detail provided regarding the ecological impact of the proposed development, with particular regard to bats and deer species. The Killarney Horse and Carriage Tours submission related to the impact on views along Ross Road across the renowned racecourse towards Mangerton Mountain.

3.2.3. The issues raised by **third parties** were more varied and included the following themes –

- Contrary to zoning
- Impact on scenic amenity and tourism
- Noise and disturbance to residents
- Light pollution
- Impact on traffic safety and parking particularly on race meeting days
- Impact on recreational amenity of Ross Road area and on amenities such as the golf course, horse racing, walking activities etc.

3.2.4. The internal reports from technical officers such as the Biodiversity Officer, the County Archaeologist and the Engineering Dept. were also summarised. It was noted that both the S.E.E. and the Biodiversity Officer had sought further information.

3.2.5. Further information was requested (23/03/22) requiring cross sections through the site, 3D graphics to illustrate visual impact, details of the proposed external finishes and colour scheme, a public lighting scheme, information regarding the likely impact on existing amenities such as the golf course and walking activities, accessibility issues and active travel (in particular cycling facilities).

3.3. Other Technical Reports

3.3.1. Biodiversity Officer – an Appropriate Assessment Screening was carried out (23/03/22). It was noted that the habitats on the site were of low ecological value and that the nearest sensitive ecological receptor was the River Laune, which flows along the eastern boundary of the racecourse complex, but at a physical remove from the proposed glamping site. The application is not within any European sites and the

nearest designated European sites are Killarney National Park SAC (150m), Killarney National Park SPA (250m) and Castlemaine Harbour SAC (7km downstream). Direct impacts were screened out and indirect impacts were assessed and largely screened out. However, some uncertainty remained regarding the potential for indirect impact on Lesser Horseshoe Bats in respect of any lighting that might be associated with the glamping use, notwithstanding the unsuitability of the site for bats in terms of commuting or roosting. FI was recommended in this regard.

3.3.2. Area Engineer – raised issues of accessibility and cycling facilities. FI was requested in respect of universal access provisions and promotion of active travel in respect of cycling facilities.

3.3.3. County Archaeologist – There are no recorded monuments listed in the Record of Monuments and Places in proximity to the proposed development site which has previously been disturbed. No mitigation is required.

3.4. Prescribed Bodies

3.4.1. Uisce Eireann responded to the application with ‘no objection’ subject to conditions as follows:

1. Where an applicant proposes to connect to a public water/wastewater network operated by Irish Water, the applicant must sign a connection agreement with Irish Water prior to the commencement of the development and adhere to the standards and conditions set out in that agreement.
2. In the interests of public health and environmental sustainability, Irish Water Infrastructure capacity requirements and proposed connections to the water and wastewater infrastructure will be subject to the constraints of the Irish Water Capital Investment Programme.
3. All development shall be carried out in compliance with Irish Water Standards and codes of practice.
4. It is recommended that the developer construct a header manhole along with a vent stack at a high point of the pumped foul sewer. The remainder of the main will then flow by gravity to connect with the existing foul sewer network serving the golf course and racecourse.

3.4.2. As noted above, **An Taisce** also made a submission regarding the need for further information on lighting proposals in terms of the potential impacts on bats and other species.

3.5. Response to Further Information

In response to the FI Request (23/03/22), Further Information was submitted by the applicant on 22nd September 2022. It responded to the items as follows:

1. **Visual impact** – 3D graphics/photomontages were submitted. It is stated that the existing wall (along Ross Road) prevents any external visual impact. Site sections submitted show that a Jarvey pony and trap is barely visible over the wall and that the proposal will not be visible to pedestrians. Details of the finishes provided.
2. **Servicing** – the pods will be served by the existing sewer line.
3. **Lighting** – A lighting scheme is submitted showing a low-level lighting using bollard lights and a wall mounted light for each unit, with the light cowled downwards.
4. **Impact on golf course** – letter from Killarney Racecourse included stating minimal impact on racecourse, golf course and walking activities. Note ‘Activity Areas’ are open areas for guests staying in the facility and will be grassed with no fixed furniture. The golf course will remain with only minor alterations to two holes. Walkers will still have access to same areas as at present.
5. **Accessibility and cycling issues** – units closest to parking areas will have graded access and cycle parking facilities will be provided. It is submitted that the site is ideal for non-motorised transport due to the proximity to the town centre and to public transport, both within walking distance.
6. **Impact on residential and overall amenities** – the facility will have a manned reception area and security provisions along with strict Quiet Time policy.

3.6. P.A. response to FI submitted 22/09/22

- 3.6.1.** The Area Planner was satisfied with the FI submitted in respect of the visual impact and considered that the proposed development would not have an unduly negative impact on views enjoyed by those using Ross Road. Given the proximity to the viewing stand and other buildings, which form a backdrop, it was considered that the glamping pods would not seriously affect visual amenities. It was further considered that the siting of the glamping pods away from the residential properties in the area, and across a busy road, there was unlikely to be any undue negative effect on residential amenities. The responses regarding accessibility and cycling were noted and considered satisfactory.
- 3.6.2.** The Biodiversity Officer (17/10/22) was satisfied with the FI submitted and had no objection. AA was screened out. The Area Planner agreed.
- 3.6.3.** A grant of permission subject to conditions was recommended.

4.0 Planning History

ABP.307396-20 – planning permission granted by board (PA Ref. 20/94) for change of use of Jim Culloty bar and event area from bar/dining use to a theatre use for the duration of the performance of Irish traditional music, song and dance show nightly at the venue.

ABP.304968-19 – planning permission refused by board (PA Ref. 18/841) for retention of an existing entertainment venue and change of use from racecourse ancillary structure to entertainment facility.

ABP.300787-18 – The Board determined that the change of use of a bar and dining room at a racecourse to use as a theatre during the summer months was development and was not exempted development.

08/4987 – Permission granted in 2009 for development on site including stable block.

04/4212 – permission was granted in 2004 to extend the existing clubhouse on both ground and first floors, make changes to front elevation of stands, demolish and build new toilet block.

03/4016 – permission refused for helipad on site.

01/3800 – permission granted in 2002 for demolition of existing tote betting shop and construction of new tote shop and new viewing stand.

92/2312 – permission granted in 1992 for lounge extension at existing stand.

1884 – permission granted for alterations and extensions to existing buildings including new concourse area in 1989. This included reference to use of the structure as bar and dining room facilities.

914 – permission granted for a Lounge Bar and Grandstand Alterations in 1979

5.0 Policy Context

5.1. Kerry County Development Plan 2022-2028

5.1.1. Introduction: - At the time that the application was made, (23/01/22), the statutory development plan was the Kerry County Development Plan 2015 and the Killarney Town Development Plan 2009-2015 (as extended and varied). These Plans have since been superseded by the Kerry County Development Plan 2022, which has incorporated the Killarney Town Development Plan (Volume 2). The Main Written Statement is in Volume 1 of the Kerry CDP and Volume 4 contains the Zoning Maps and Volume 6 contains the Zoning Objectives and Development Management Standards.

5.1.2. The site (including the racecourse and the golf course) is zoned **G4 Active Open Space** the objective for which is 'Intended solely for the provision of recreational uses'. The description of the Zoning Objective is as follows:

“Provide recreational and amenity resources for the community including sporting and leisure facilities”.

Caravan, Camping and Glamping developments are '**Open for Consideration**' in this zone.

5.1.3. Chapter 10 – Tourism and Outdoor Recreation – this chapter emphasises the importance of the tourism industry to the county and the need to 'drive Kerry's position as a premier international tourism destination, with a focus on developing green and sustainable tourism'.

Section 10.3.5 Visitor Accommodation - It is stated that the Council recognises that the provision of varied accommodation types is essential to enable growth in the tourism sector and notes that traditionally, tourism growth has followed accommodation growth.

10.3.5.1 Camping/Glamping, Campervans and Caravans – it is recognised that the provision of suitable sites for these forms of accommodation is an important element in the range of tourism accommodation offers.

KCDP 10-31 - Support the development of appropriately scaled camping/glamping, campervan and caravan type accommodation located within/or adjacent to existing settlements, established tourism assets or adjacent to a main farmyard complex on suitable sites and at an appropriate scale subject to normal planning considerations.

5.1.4. Kerry CDP (2022) Volume 6 – *Development Management Standards* includes the following relevant sections -

1.12 Tourism Related Developments – Developments that may be open to consideration outside settlement centres include indoor and outdoor recreational facilities, golf courses, swimming, angling, sailing/boating, pier/marina development, equestrian and pony trekking routes, adventure/interpretive centres, tourist related leisure facilities including walking and cycling.

1.12.2 Caravan, Glamping and Camping developments – the provision of camping/glamping and tourist caravan parks to facilitate the expanding tourist industry is encouraged by the Planning Authority.

Proposals will also be assessed with regard to the following matters:

- Parks will be permitted within settlement boundaries only.
- Parks will not generally be permitted in proximity to the coastline, outside of lands specifically zoned for such development.
- Location of the development relative to existing services including retail and social facilities.
- Availability of services to cater for the development.
- Impact on existing residential amenities, traffic, waste disposal and general disturbance will be considered.

- Impact on the environment including the integrity of Natura 2000 network.

Applications shall also address the following:

- A high standard integrated design and layout linking pitches to well-located communal areas and onsite facilities and amenities.
- A detailed hard and soft landscaping plan for the overall site.
- Mitigation plans for noise and litter; and
- Details of wastewater disposal for the site

5.1.5. Killarney Town – Volume Two Kerry CDP 2022

In the introduction (2.1) it is stated that Killarney occupies a very significant place in Irish Tourism. It is further stated that the town balances protection of an exceptional natural environment, ecology and heritage with inherent strengths in tourism, culture, amenity and other dynamic activities. The vision (2.1.3) is to create an attractive location to live, work and visit and to develop the town as a ‘world class tourist destination’, governed by the Principles of Universal Access.

2.8 Tourism – Killarney is a tourist accommodation and service centre of excellence providing cultural experiences, transport links, heritage features and a wide range of essential services to a large number of visitors who are drawn to the area by its spectacular natural environment.

KA 61 - Strengthen Killarney’s identity and sense of place to facilitate the enhancement of Killarney as a tourism destination while maintaining its key role as an economic driver in the area and preserving a balance between economic success and protection of the local environment.

KA 63 - Strengthen and promote a sustainable relationship and connectivity of Killarney Town as integral to the Killarney National Park.

2.10 Recreation, Amenity and Open space – provision of public open space and recreational facilities is deemed to be an integral part of the required infrastructure of the town.

KA69 - Protect existing leisure facilities, including sports clubs, grounds, built leisure facilities and areas of public and private open space from redevelopment to other

uses unless an alternative open space or leisure facilities can be provided to serve the same area.

5.2. Natural Heritage Designations

- 5.2.1.** The Killarney National Park, McGillicuddy Reeks and Caragh River Catchment SAC (000365) lies approx. 150m to the west and a similar distance to the southeast (River Flesk), and the Killarney National Park SPA (004038) is located approx. 200m to the west of the site.

6.0 The Appeal

6.1. Grounds of Appeal

- 6.1.1.** Five third-party appeals were submitted by local residents/residents' groups. The main points raised may be summarised as follows:
- **Principle of development and nature of use**
 - The site is zoned G4 Active Use open space, and the proposed glamping use is contrary to the zoning objective and would create a precedent which would erode the buffer zone between the built-up area and the National Park.
 - The nature of the use with fixed modular units on concrete pads with permanent services provided is more akin to chalets and is therefore one that is more aptly described as a service type industry use, and more suited to CS zone.
 - The area is currently used by locals on a consistent basis for recreational activity such as walking. The proposed use bears no relationship to the current active open space recreational use.
 - The proposal contravenes Objective KA69 to protect existing sports grounds.
 - There is recent precedent for refusal of a similar development in Fossa, Killarney (P.A. Ref. 21/263) on the grounds of impact on residential amenity and property values.
 - **Noise and disturbance, safety and security**

- Ross Road is a quiet cul-de-sac, especially at night. The proposed development is likely to result in noise and disturbance from late night partying, socialising and eating/drinking outdoors, hen/stag parties etc. due to the close proximity of the development to the houses on Ross Road.
 - The disturbance from unruly behaviour, security cameras, noise and additional traffic on the road would adversely affect residential amenity and would result in the depreciation of property values.
 - There is no confidence that the proposed 24-hour security required by condition 13 of the P.A. decision would adequately deal with such issues and if implemented, would be likely to reduce the economic viability of the development. This in turn would result in pressure to increase the number of pods within the development.
 - The proposed development would give rise to light pollution which would affect residential amenity.
 - Stray golf balls would surely endanger occupants of the glamping pods.
- **Traffic and parking**
 - The racecourse does not have adequate parking capacity to accommodate people attending race meetings which results in overspill parking onto Ross Road. This has resulted in residential estates being blocked and cars parking on the cycle lane on Ross Road. The proposed development would exacerbate this situation and create a traffic hazard. It would also be contrary to the Council's ambitions to create safe cycle routes.
 - As recently as July 2022, cars associated with the racecourse have been parked on the area assigned as Activity Area 2 (photos provided). This temporary parking area (which accommodates 150-250 cars) will be displaced by the proposed development, which will exacerbate the overspill parking on Ross Road.
 - A further temporary car park associated with the racecourse is a field which is located further to the south along Ross Road. However, this land has recently been the subject of several planning permissions for housing developments, some of which have already been implemented.

- **Visual and scenic amenity**

- Ross Road is a beautiful tree-lined road with scenic views leading to the National Park, Killarney Lakes and Ross Castle. The proposed development would have a detrimental effect on the visual and scenic amenities of the area. The racecourse is world renowned for being scenically attractive and the glamping pods would interfere with views from Ross Road towards Mangerton Mountain.
- The P.A. sought cross sections to be submitted as Further Information. However, it is disputed that these cross sections accurately depict the visual impact from Ross Road. It is claimed that the P.A. should have insisted that height poles be erected on site.
- It is claimed that the cross sections are based on views from the footpath at an eye level of 1.2-1.5m. However, this is considered to be unrealistic as the average height of a person is greater than 1.5m. In addition, tourists travelling on a Jarvey pony and trap will be at a higher eye-level and furthermore, tend to stand up to take photos.

- **Ecology**

- The site of the proposed development is within 200m of the National Park SAC and the proposed glamping site would have an adverse impact on the nature conservation value of the National Park. There is no evidence that the applicants have engaged with the NPWS.
- The light that would be emitted during construction and operation of the use would interfere with the flight paths of Lesser Horseshoe (LHS) Bats, which are a Protected Species and are a Qualifying Interest of the nearby Killarney National Park SAC.
- There are a number of LHS bat roosts in the vicinity of the site which would be affected by the proposed development by reason of noise and disturbance and light pollution.

6.2. Planning Authority Response to grounds of appeal

6.2.1. The P.A. responded to the grounds of appeal on the 23rd November 2022 as follows:

The planning authority considers that the issues raised in the third-party appeals have been addressed in the Planner's Reports on the further information request and the final assessment.

Some of the appeals reference the Draft Ministerial Direction on the County Development Plan 2022-2028. Notice has been given that on the 12th of August 2022, Kerry County Council received notification from the Minister for Housing, Local Government and Heritage of his intention to issue a Direction pursuant to Section 31 of the Planning and Development Act 2000 (as amended). The Draft Ministerial Direction related to the adoption of the Kerry County Development Plan 2022-2028. This Draft Ministerial Direction is now placed on public display for a period of two weeks, whereby submissions can be made to the planning authority with regard to the Draft Direction.....It should be noted that the draft direction only relates to the Renewable Energy Chapter of the County Development Plan.

6.3. Observations on the grounds of appeal

- 6.3.1.** Three submissions from observers have been received by the Board, two of which were from further residents/residents' groups, and one was from an agent acting on behalf of the Ross Golf Club.
- 6.3.2.** The main points raised by the **residents/residents' groups** were largely similar to those raised in the third-party grounds of appeal as summarised above. Some additional points/expansion of issues made are as follows:
- **Principle of use** – Contrary to 'G1-G5' zoning - Kerry CDP (pg. 51, vol. 6), which emphasises the importance of protecting the integrity of biodiversity and to recognise the importance of wildlife corridors. The proposed use is also incompatible with the use of the lands as a golf course.
 - **Precedent** – Several recent planning decisions in Kerry which resulted in the refusal of permission for developments involving glamping were cited, which related to residential amenity grounds, as well as one SHD application refused by the board on the grounds of unacceptable impact on LHS bat species.

- **Ecological impact** – The Killarney National Park is in close proximity and there are many species present such as deer, otters, foxes, badgers and voles which forage on the edge of the park. They will be severely affected by the proposed development.
- **Impact on LHS Bat species** – There are confirmed roosts for the LHS bat species at Killarney House and Knockreer, which are located approx. 1km and 1.36 km respectively from the site. These bats are known to move from roost to roost. Irrespective of the nature of the proposed lighting, the presence of lights and noise/disturbance at night will have a detrimental effect on commuting and foraging routes. Notwithstanding the views of the P.A. Biodiversity Officer, that the site represents open grassland with little or no continuous vegetation (and therefore unsuitable habitat), it is pointed out that there is a 500m line of 200-year-old trees, which are over 30m in height, which are frequented by LHS bats.

6.3.3. The Observation from **Ross Golf Club** (5/12/22) also reiterates many of the points raised in the grounds of appeal and observations summarised above, but some additional points were also raised regarding the impact on the golf course. It was pointed out that the Golf Club, as a lessee of the racecourse, had refrained from making a submission previously to the P.A. and had only recently become aware of the FI response by Killarney Racecourse (dated 26/08/22), which had implied that there was no objection from the Golf Club. However, opposition had been raised to the proposed development. Some of the main points raised are as follows:

- **Impact on Existing golf course** – the proposed development would result in the loss of two holes for up to two years due to re-design and reinstatement of two holes. This would result in the permanent loss of the practice area and would negatively impact the members as it would become a ‘non-qualifying’ course for the duration of the works. This could potentially affect participation in competitions, handicaps and ultimately club membership. The proximity of the glamping pods to the golf course also raises health and safety issues. The proposal will therefore impact on the short-term operations and long-term viability of the golf course. This is contrary to Objective T-10 of the CDP to support Kerry as a world class destination for sports and recreation related tourism and the overall objective to support sustainable tourism.

- **Incompatibility with racecourse** – The racecourse tends to attract much interest with live broadcasts on mainstream and premium channels. The race meetings are significant events that require considerable attention to health and safety matters. The proposed development would contribute to a greater risk in terms of health and safety as access to the glamping site would require crossing the racecourse, the buffer zone and the perimeter road. Activity Areas 1 and 2 are located close to the racetrack and it is unclear what the intended use of these areas will be. Any inappropriate uses could ‘spook’ the horses resulting in injury. The proposed development would interfere with the operation of the racecourse and potentially have serious implications for the course and the sport.
- **Impact on residential amenity** – no information is given regarding the precise use of the activity areas which could result in serious noise and disturbance to local residents.
- **Impact on visual amenities** – Lough Leane, the National Park and Ross Castle etc. are located with landscapes with a High sensitivity rating. The glamping pods will detract from views over the racecourse of the scenic landscapes and the FI response did not take account of coach tours and jarveys, both of which would be at an elevated eye level.

6.4. First party response to Grounds of appeal and observations

- 6.4.1.** A submission was received on the **15th December 2022** from the first party appellant’s agent, Patrick Murphy Engineering Consultant which included a response from Southern Scientific on biodiversity and the issues regarding bat species.
- 6.4.2.** The response is generally in the form of a rebuttal of the grounds of appeal. It is emphasised that the applicants are established operators of glamping sites elsewhere which are of a very high quality and have been managed to date with no issues arising regarding impact on surrounding properties.
- 6.4.3.** The submission from **Southern Scientific** may be summarised as follows:
- Biodiversity** – the site has been highly modified (existing racecourse and golf course) and comprises poor grassland species of low ecological value. It is unlikely, therefore, that there would be any adverse impact on the biodiversity of the site.

Lesser Horseshoe Bat – information provided regarding the species with cross referencing to published scientific data and research. Of note, the LHS bat species is unable to crawl and must therefore fly in/out of roosts, they are committed to their roosts and navigate between roosts and foraging sites by means of treelines, stone walls and hedgerows, being reluctant to fly out in the open. The development site is located 1km from the nearest roost but does not contain any suitable foraging habitat for LHS bats and does not contain any cover which the species requires when commuting from roosts to foraging areas. It is noted that LHS bats are very sensitive to light and will avoid brightly lit areas. It is acknowledged that the proposed development will result in additional lighting but given that it is located close to existing residential and commercial development with external light sources and street lighting, the area is one that LHS bats are likely to avoid.

7.0 Assessment

7.1.1. It is considered that the main issues arising from the appeal are as follows:-

- Principle of development/nature and extent of use including precedent
- Residential amenity – noise and light pollution, safety, security
- Visual and scenic impact
- Traffic and parking Impact
- Ecology
- Environmental Impact Assessment
- Appropriate Assessment

7.2. Principle of development/ Nature and extent of use

7.2.1. The Racecourse site is zoned 'Active Open Space', the objective for which is to provide recreational and amenity resources for the community including sporting and leisure facilities. Uses that are 'Open to Consideration' include Caravan, Camping and Glamping Developments. Thus, the proposed use is considered to be acceptable in principle provided that it is generally in accordance with the other

relevant policies and objectives of the Development Plan, including those specifically relating to open space provisions.

Development Plan policies

- 7.2.2. Objective KA69** seeks to *protect existing leisure facilities, including sports clubs, grounds, built leisure facilities and areas of public and private open space from redevelopment to other uses unless an alternative open space or leisure facilities can be provided to serve the same area.* The third-party objectors believe that the proposal contravenes this objective. The applicant has pointed out, however, that the section of land to which the proposed development relates is not currently used for active leisure activities, apart from a small section of the golf course. Given that the northern section of the golf course is to be redesigned, it is considered that this use will not be displaced. Although the Ross Golf Club members have submitted an observation which raises concerns about the impact of the changes on the operation of the golf club, it is considered that the transitional arrangements are an internal matter between the golf club and the racecourse operators.
- 7.2.3.** Some third parties believe that the proposed glamping use would interfere with the operation of the racecourse in terms of either being a distraction to horses on the circuit during a race and/or displacing the use of Activity Area 2 for temporary car parking during race events. Some submissions also raise concerns that the proposed use would interfere with walking activities on lands which have traditionally been available to the general public for this purpose.
- 7.2.4.** In terms of the issue of potential distraction for horses, it is considered that this is a matter for the racecourse owners/operators, and it is noted that the application was accompanied by a letter of support from them. The applicant has stated that there will be no interference with walking activities as the site is not part of the area frequented by walkers. I would agree that the site is currently open grassland in the middle of the racecourse circuit and is not likely to be a valued resource for walkers particularly given the abundance of forest and lakeside walks in the vicinity. The potential displacement of parking will be addressed in the Traffic and Parking section of this report below. It is considered, therefore, that the proposed development would not displace an existing leisure facility and is likely to co-exist satisfactorily with the

current leisure activities on the adjoining sections of the racecourse and golf course grounds.

- 7.2.5.** Some of the third-party objectors believe that the proposed development, due to its physical nature and provision of concrete pads and underground services, gives the use a more permanent character which they consider to be more akin to chalet accommodation than camping/glamping. Although the structures are more permanent than other forms of camping, it is considered that this would be similar to many caravan parks where concrete pads, underground services etc are provided on site. It is also considered that the proposal as submitted would provide more certainty regarding the layout and appearance of the development.
- 7.2.6.** The policies and objectives of the Kerry County Development Plan 2022, (as summarised at 5.1 above), emphasise the importance of the tourism industry to Kerry, and to Killarney in particular, which is described as ‘a world class tourist destination’ (2.1.3). Policy objectives KA61 and KA63 seek to strengthen and promote the town’s role as a key tourism destination and preserving the balance between economic success and protection of the local environment. There is an acknowledged need to cater for a variety of forms of tourist accommodation in order to enable the growth of the tourism sector. This includes the provision of glamping/camping sites, which are directed to locations within or adjacent to existing settlements.
- 7.2.7.** Section 1.12.2 (Volume 6) encourages the provision of caravan, camping and glamping parks in appropriate locations and sets out the matters that will be taken into account. These include locations close to existing facilities (retail, social etc.), availability of services, impact on the natural environment and impacts on residential amenities, traffic, waste disposal etc. The location of the site within walking distance of the town centre and in close proximity to the natural amenities offered within the national park make the site a suitable one in this regard. The availability of services is also in its favour. The proposed development is therefore considered to be acceptable in principle provided that there would be no significantly adverse impacts on residential amenity, visual amenity, traffic on the local road network or on ecology. The issues of impact on residential amenities, traffic and the natural environment will be considered in the following sections of this report.

Precedent

7.2.8. The third parties have made reference to four planning decisions in Kerry which they consider have established a precedent for the refusal of permission in terms of the current application/appeal. I will address each of the planning decisions in turn as follows:

PA Reg. Ref 21/623 – Camping, Caravan and Glamping development near Fossa - Refused. The proposed development was for a total of 85 pitches (35 tent pitches, 21 caravan pitches, 13 glamping units and 16 mobile home sites) as well as 2 no. amenity blocks (incorporating kitchen, dining, games room, outdoor eating area, sanitary accommodation, showers, laundry etc.), 85 no. recreational vehicle stands, 16 public car parking spaces, site entrance, WWTP and polishing filter etc.

The location of the site was in the open countryside north of the N72 and remote from any settlements. It was also sited adjacent to several one-off houses. The proposal was refused by the P.A. on four grounds including contravention of Obj. T-70 and section 13.11 of the 2014 CDP relating to the provision of tourism accommodation which is directed to locations within settlements. Other reasons related to the scale and location of such a large camping site and proximity to houses, which would be injurious to residential amenity and property values, inadequate proposal for treatment of effluent and impact on archaeology.

PA Reg. Ref. 22/289 – Glamping site outside Caherciveen – Refused. The proposed development involved the provision of 6 glamping pods, an access road, car parking and refuse store in a rural area accessed off the N70 to the NE of Caherciveen. It was refused on 3 grounds including remoteness from settlement and hence contravention of CDP policies (13.11), access onto a National Road, traffic hazard and inadequate treatment of effluent.

PA Reg. Ref. 21/528 – Glamping site outside Ballyheigue- Refused. The proposal related to 4 glamping pods, connection to public WWTP, parking access etc. The site was stated to be in a sensitive coastal area almost 2km outside Ballyheigue village. The grounds for refusal related to the sensitive coastal environmental location, interference with the character of the landscape, and non-compliance with policy 13.11 as it was a site which was outside a settlement, remote from retail/social facilities and not within a farm complex. The Area Planner report

also referred to that fact that the remote location of the site would mean that the development would be car dependent and that it would set an undesirable precedent.

ABP.312987 – SHD 228 residential units Port Road, Killarney – Refused.

Reason for refusal related to Appropriate Assessment issues and proximity to Killarney National Park SAC, wherein Lesser Horseshoe Bats are a qualifying interest.

- 7.2.9.** The first three cases referenced above related to rural sites which were remote from/outside settlements and therefore car-dependent sites which would not be in compliance with the policy objectives of either the current CDP or the previous CDP. In addition, the only one which was refused on the grounds of impact on residential amenity related to a significantly larger development which was directly adjacent to residential dwellings. The Killarney Glamping proposal differs markedly from these proposals as the site is located within the development boundary and the built-up area of Killarney town and is zoned Active Open Space, where the proposed use is 'open for consideration'. It is also within walking distance of the services and facilities on offer in the town centre and is relatively remote from the established residential areas in the vicinity of the site.
- 7.2.10.** The Board decision regarding AA Screening of the SAC was based on the absence of sufficient scientific evidence to clearly eliminate the likelihood that the artificial lighting associated with this large-scale residential development would not have a significant adverse impact the LHS bat species, where there was a known roost site nearby and where the bats were known to commute along the Port Road. The Appropriate Assessment issue is site specific and relates to a specific development proposal. The need for Appropriate Assessment of the current case will be addressed later in this report.
- 7.2.11.** In conclusion, it is considered that the previous decisions by the planning authority and the Board referenced by third parties are not of any significant relevance to the assessment of the appeal currently before the Board for the reasons outlined above.

7.3. Residential Amenity - noise and disturbance, light pollution, safety/security

- 7.3.1.** Concerns raised by third parties included the potential for noise and disturbance, particularly at night, from outdoor entertaining, parties associated with stag and hen

nights etc., which could give rise to unruly and anti-social behaviour. This issue was raised by the P.A. and the applicant's response was to state that there would be on-site management of the use and an enforced Quiet Time policy. The P.A. decision included a condition (No. 13) requiring the provision of such security/management on a 24-hour basis and the submission of a detailed management plan prior to commencement of the use. The third parties were not satisfied with the efficacy of this condition and considered that its implementation would bring the financial viability of the development into question.

7.3.2. The racecourse site is located within the settlement boundary for Killarney. Ross Road is a cul-de-sac road, which is mainly used to access the National Park and Ross Castle, but there has also been some residential development in recent years, which has contributed to additional traffic along the route. The racecourse is a significant tourist attraction for the town and would be an important feature in the local economy. The racecourse grounds are expansive (90 acres) and incorporate a variety of uses, including a golf course with a clubhouse/function room, a driving test centre, and it hosts various community facilities/events such as training for rowing clubs, yoga classes etc. as well as the Celtic Steps Irish Music theatre and various entertainment facilities associated with the racecourse.

7.3.3. The local environment is, therefore, mixed in nature and land use. It is an urban site within walking distance of the town centre, with a growing residential element, yet it is characterised by expansive wide-open spaces with treelines and hedgerows. Within this potentially tranquil setting, however, there is an established variety of leisure and entertainment uses within the complex, many of which would include evening events. Although the existing background noise environment has not been detailed, the range of uses with daytime, evening and weekend hours of operation are likely to contribute to a varied noise environment. In this context, it is considered unlikely that noise from the proposed glamping site would give rise to any significant levels of noise nuisance. It should further be noted that the housing estates on Ross Road are located a considerable distance from the proposed glamping site and are separated by a stone wall and mature tree line which bound this busy road. The housing developments on the eastern side of the racecourse are also separated from the site by a variety of buildings and a carpark, as well as robust boundary treatment.

- 7.3.4.** Notwithstanding the potential for a relatively high background noise environment associated with events at the racecourse and the mitigating factors of the separation distances from residential properties and screening effects of intervening landscaping and buildings, I would, however, accept that there is still some potential for noise and disturbance arising from potential unruly behaviour from the occupants of the glamping site. However, I would agree with the planning authority that a condition requiring the provision of 24-hour supervision and management would address this matter. It is likely to be in the interests of the operators of the glamping site to ensure that the site is well supervised and managed at all times, as otherwise, reputational damage could affect the profitability of the business and potentially the lease arrangements. In this regard, the first party submission (15/12/22) in response to the appeal emphasised that the operators have an established track record for managing similar sites without any complaints. Should the Board be minded to grant permission, therefore, it is considered that a condition similar to condition 13 of the P.A. decision should be attached to any such permission.
- 7.3.5.** The issue of precedent arising from the refusal of a development including glamping pods on the grounds of impact on residential amenities and property values was addressed in the preceding section of this report.
- 7.3.6.** The observers also raised the issue of light pollution. It is noted that the applicants provided a lighting plan for the proposed development as Further Information on 22/09/22. This indicates that the proposed development would be lit by means of low-level bollard lights and a wall mounted light for each of the units, with the light cowed downwards. It is considered that the proposed low-level lighting combined with the distance from any residential properties is unlikely to result in any significant injury to residential amenity.

7.4. Impact on visual and scenic amenity

- 7.4.1.** The concerns raised by third parties relate to interference with views of the racecourse, which would be obtained both from within the racecourse grounds and from Ross Road, which has scenic views of the mountains in the background. In addition, the visual impact on the overall area was raised as well as the visibility of the glamping site from Ross Road to tourists travelling by bus or by Jarvey.

- 7.4.2.** Having inspected that site, I was struck by how expansive the grassland area is within and immediately adjoining the site, whereby the proposed glamping site visually merges relatively seamlessly with the racecourse circuit and the golf course, all of which are covered in grass. The proposed glamping site would occupy a very small part of this expansive area and would be centrally located at the northern end of the racecourse circuit but separated from the land uses adjoining the racecourse by the circuit itself. Thus, the site is a considerable distance from either Ross Road or the parking area/viewing stands of the racecourse and is also well removed from any residential development surrounding the grounds.
- 7.4.3.** I can confirm that the proposed development would not be visible from the formal entrance to the grounds, the bus/car park at the entrance or from Ross Road in the vicinity of the entrance to the grounds. I walked along Ross Road and observed Jarvey vehicles (pony and trap) and also walked along the internal road which runs parallel to the northern part of Ross Road. I can confirm that the only section of this road where views of the proposed development would be clearly visible is through/over the maintenance gate on Ross Road. There is a substantial natural stone wall on either side of this gate which stretches for some distance in either direction. There is also a significant amount of mature planting adjoining the wall. These elements provide significant visual screening along Ross Road. I noted the top/roof of a pony and trap from the internal road as it travelled past the site. Although the proposed glamping pods would be visible to some extent from Ross Road, particularly if elevated above the c.2m high wall, such views would be passing views or glimpses and would not alter the character of the landscape.
- 7.4.4.** The proposed development includes mitigation in the form of muted colour schemes and extensive landscaping with semi-mature trees to be planted, which would further screen the proposed development from passers-by. It is considered, therefore, that the visual impact of the proposed development on the surrounding area would be minimal and that the impact on the visual and scenic amenity associated with the racecourse would not be so significant as to justify refusal of the proposed development and would be adequately mitigated by the proposed landscaping and colour scheme.

7.5. Traffic and parking impact

- 7.5.1.** The objections raised relate to the adequacy of the racecourse grounds to accommodate parking for patrons/visitors on race-days, and concerns associated with displacement of space that has hitherto been used for car parking for race meetings, rather than any concerns regarding the adequacy of parking provision for the proposed glamping use. The space in question corresponds with Activity Area 2 in the submitted plans for the proposed development. Issues relating to the availability of another off-site field which has been used by racecourse operators in the past were also mentioned in the submissions. The concerns centre around the overspill effect of inadequate on-site parking facilities with associated problems for residents and traffic safety. Some submissions included photographs of car parking in this area during a recent race meeting.
- 7.5.2.** The first party submissions, however, indicate that the area in question (corresponding with Activity Area 2 in the proposed plans) is not deemed necessary for parking associated with the racecourse. There is clearly some dispute between the parties regarding the issue of car parking associated with the race meetings, of which there are approx. 12 day-long meetings per annum. The area of land proposed for the glamping use is open grassland which is contained within the racing circuit. It would not, therefore, be suitable for car parking on a regular basis as both the ground surface and the access to it would be inappropriate. Thus, the temporary use of these lands for car parking during a race meeting is one that seems to be ad hoc in nature and the proposed development would not be likely to displace an essential part of the racecourse or interfere with the operation of this leisure activity.
- 7.5.3.** It is noted that the racecourse grounds are quite substantial, being c.90 acres or 36 hectares. It is considered that the operation of the racecourse is a matter for the racecourse owners/operators who have a duty and responsibility to ensure that illegal parking on the surrounding roads does not occur during race meetings. The local authority has parking enforcement powers to address this matter should problems arise on the local road network in the future. It is considered that the small-scale nature of the proposed glamping use (15 pods) is unlikely to contribute to traffic and/or parking issues on the road network adjoining the site.

7.6. Ecology

- 7.6.1.** The third parties have raised concerns regarding the potential impact on ecology and biodiversity, particularly in respect of the effects on Lesser Horseshoe Bats, which are a Qualifying Interest of the nearby Killarney National Park SAC. The Board should note that this issue is also addressed in the Appropriate Assessment section of the report below. I would also refer the Board to the response from the first party (15/12/22) which specifically addresses the issues raised in the third-party appeals and observations.
- 7.6.2.** The site of the proposed development is not within any European designated sites but is located approx. 150m from the Killarney National Park MacGillicuddy Reeks and Caragh River Catchment SAC and c.250m from the Killarney National Park SPA. The intervening lands include the racetrack, an internal road, Ross Road and housing developments on the opposite side of Ross Road.
- 7.6.3.** The site of the proposed development is of low ecological value comprising open amenity grassland within a racecourse complex and associated built grounds on the outskirts of Killarney town. The nearest ecological receptor is the River Flesk (a tributary of the River Laune), which flows alongside the eastern boundary of the racecourse grounds. However, the proposed glamping site is physically removed from the river and is contained within the racecourse track and bounded by an internal road network, and as such is a highly modified environment. Thus, the likelihood of any significant impact on biodiversity within the site and/or the racecourse complex is quite remote.
- 7.6.4.** Concerns have been raised that the proposed development could adversely affect the LHS bat species which frequents the National Park. There is concern that by reason of noise and disturbance, it would affect roost sites and/or foraging habitats and commuting corridors. In addition, there is concern that the lighting associated with the proposed glamping use would have an adverse impact on bat activity. It is noted from the NPWS Site Synopsis that the LHS bat species is associated with woodland habitats and linear features, of which there are none within or adjoining the site of the proposed development, and that they are reluctant to fly in the open.
- 7.6.5.** No evidence has been presented of any roosting sites within the site or the racecourse grounds, and the P.A. Ecologist Report noted that there are no structures

or features within the racecourse grounds which would represent suitable roost sites. Third party objectors noted the presence of known roosts at 'Killarney House' and 'Knockreer House', but these sites are located at least 1km away, within the woodland demesne, and are not proximate to the racecourse site. Reference was also made to a 500m line of trees adjacent to the site, but this line of trees is on the opposite (western) side of Ross Road and is separated from the adjoining woodland to the west by established housing estates.

7.6.6. The P.A. Ecologist has stated, following an inspection of the site, that the site is not one which would be suited to bat activity as it is an open amenity grassland site with little or no tall continuous vegetative growth. It was further stated that as bats tend not to fly through open landscapes, and the proposed development does not result in the loss of any trees, woodlands or linear features, the proposed development is unlikely to have any significant direct effects on the species. The proposed lighting plan was, however, queried in terms of potential indirect impacts, but the Further Information submitted on the 22/09/22 clarified this matter.

7.6.7. It was concluded that the site is unsuitable for commuting/foraging bats and is within an active racecourse complex, adjacent to Ross Road and to residential areas, where public lighting is already present. It was considered that the proposed low-level lighting would not give rise to any significant effects on bat activity in the area. Having reviewed the material on the file and inspected the site, I would agree with this assessment.

7.7. Environmental Impact Assessment

7.7.1. Class 12(d) of Schedule 5 Part 2 of the Planning and Development Regulations 2001 (as amended) provides that mandatory EIA is required where a permanent camp site or caravan site would be developed where the number of pitches would be greater than 100. The proposal is for the development of a site for glamping which would involve the provision of permanent pitches for 15 glamping pods. Accordingly, it does not attract the need for mandatory Environmental Impact Assessment.

7.7.2. (See completed Form 2 on file). The site is located within the built-up area of an existing town and is not located within any European site or other sites of conservation interest. The site is situated within a racecourse complex which

includes a golf course and several other uses within the grounds. The surrounding area is primarily in use as residential, recreational and active open space uses with some commercial elements. Having regard to the nature, size and location of the proposed development and to the criteria set out in Schedule 7 of the Regulations, I have concluded at preliminary examination stage, that there is no real likelihood of significant effects on the environment arising from the proposed development. Environmental Impact Assessment is, therefore, not required.

7.8. Appropriate Assessment

7.8.1. Compliance with Article 6(3) of the Habitats Directive

The requirements of Article 6(3), as related to screening the need for appropriate assessment of a project under part XAB, Section 177U of the Planning and Development Act 2000 (as amended), are considered fully in this section.

Background to the application

- 7.8.2.** The site is accompanied by an Appropriate Assessment Stage 1: Screening Report, which was completed by Southern Scientific Ltd. It is considered that the Stage 1 AA Screening Report was prepared in line with current best practice guidance and provides a description of the proposed development and identifies European sites within a possible zone of influence of the development.
- 7.8.3.** It contains a description of the proposed development, the project site and the surrounding area. It outlines the methodology used for assessing potential impacts on the habitats and species within the European Sites that have the potential to be affected by the proposed development. It predicts the potential impacts for the sites having regard to their conservation objectives, it assesses in-combination effects with other plans and projects, and it identifies any residual effects on the European sites and their conservation objectives.
- 7.8.4.** The site is not located within any designated European site. It was noted that the development site is bounded to the north, east and west by a road and a racetrack and to the south by the golf course. Further to the west, it was noted that there is an existing stone wall which runs in a north-south direction for approx. 500m, and to the east and beyond the racetrack, there are a number of buildings which are associated with the racecourse. It was noted that the River Flesk flows alongside the racecourse

but that there are no direct surface water drains from the development site to the watercourse. It was further noted that the River Flesk remains 'Unassigned' adjacent to the proposed development site, but that upstream at Flesk Bridge, the water quality is 'Good' and downstream, where it flows into Lough Leane, the water quality is also 'Good'.

- 7.8.5.** The submitted Screening Report identified three European sites within a 15km radius of the site. It is stated that the closest European site is the Killarney National Park, MacGillicuddy Reeks and Caragh River Catchment SAC (Site code 000365), which is located to the north, west, and to the south and includes the River Flesk which bounds part of the eastern boundary of the racecourse grounds. The site is also within 250m of the Killarney National Park SPA (Site code 004038) which is also located to the north, west and south. The site is located within 7km of the Castlemaine Harbour SAC (site code 000343), which is downstream of the site. It was noted that the River Flesk flows into Lough Leane which in turn flows into the Rover Laune, which provides for a potential hydrological pathway to the SAC.
- 7.8.6.** Killarney National Park, MacGillicuddy Reeks and Caragh River Catchment SAC (Site code 000365) is designated for a wide range of habitats and species which are set out in the Site Synopsis (attached). The species include Marsh Fritillary, Lesser Horseshoe Bat and Otter. The overall aim of the Habitats Directive is to maintain or restore the favourable conservation status of habitats and species of community interest. Killarney National Park SPA (Site code 004038) is designated for a number of species including Greenland White-fronted Goose, Merlin, Peregrine, Ring Ouzel and Red Grouse (Site Synopsis and Conservation Objectives attached). The objective is to maintain or restore the favourable conservation condition of the bird species listed as Special Conservation Interests for this SPA.
- 7.8.7.** The submitted Screening Statement had identified potential risks to water quality arising from construction activities. A potential source-pathway-receptor linkage was identified to the European sites, as the glamping site, which was described as being almost flat with a gentle slope to the south in the direction of Lough Leane, provided a potential hydrological link. It was pointed out, however, that no works are proposed to occur within a designated site and there are no watercourses or drains within the development site. Furthermore, no works are proposed in the vicinity of the River Flesk, there is no surface water connection to the River Flesk and the development

site is bordered by a road and a horse racing track. The slope of the racetrack is such that water would have to travel uphill to leave the site. The River Flesk is also bounded by a low berm and vegetation. Thus, it was established that there was no direct hydrological link to either of the European sites.

- 7.8.8.** It was noted that indirect impacts during construction works from increased noise and activity and on Qualifying Interests downstream of the site could potentially arise from contaminated surface water runoff. Such impacts could arise from earth moving activities, use of equipment leading to potential hydrocarbon contamination and the risk of spillages/accidents. However, given the distance to the watercourse, the nature of the intervening lands, the small scale of development and the specific nature and design of the work to be undertaken, these works were considered unlikely to result in any significant risk. In addition, works will be carried out in accordance with the CIRIA Guidelines. Once the site becomes operational, all foul and wastewater from the site will be piped to the existing WWTU within the Racecourse grounds. It was concluded that significant effects on the European sites identified can be ruled out on the basis of distance and the lack of a hydrological connection.
- 7.8.9.** The submitted Screening Report also examined any potential impacts on the nearby European Sites in respect of the loss/alteration of habitats, habitat or species fragmentation disturbance or displacement of species and any in combination or cumulative impacts. However, no potential significant direct or indirect impacts were identified. This was due to the nature of the habitats on site, (open amenity grassland in use as a golf course and horse racing circuit), the nature and use of the lands within and in the vicinity of the site, (with a mixture of agricultural, woodland, residential and commercial uses), and the separation distance and lack of hydrological or other ecological connection from the European designated sites.
- 7.8.10.** The applicant's AA Screening Report concluded that

“The Killarney National Park and MacGillycuddy Reeks and Caragh River Catchment SAC, The Killarney National Park SPA and the Castlemaine Harbour SPA were considered to be the only Natura 2000 sites potentially impacted by the development. None of the threats, pressures or activities listed on the Natura 2000 Standard Data forms for the SACs and SPA will occur either inside or

outside of this site as a result of the proposed development. Due to the location, scale, duration and nature of development, it has been objectively concluded that significant impacts to the integrity of these Natura 2000 sites are unlikely to occur as a result of the proposed development.”

7.8.11. The following reasons were given for the above conclusions -

- The proposed development is small in scale, the excavation requirement is limited, the works are not complex in nature and the development site will be contained and controlled.
- The proposed site is not located within any Natura 2000 site.
- Significant water quality effects on Natura 2000 sites arising as a result on the proposal are not likely.
- No direct loss or alteration of habitats in Natura 2000 sites will occur.
- Significant cumulative/in-combination effects through interaction between the proposal and other plans, projects and activities are not likely.

7.8.12. Having reviewed the documents and submissions I am satisfied that the information allows for a complete examination and identification of any potential significant effects of the development alone, or in combination with other plans and projects on European sites.

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7.8.13. The project is not directly connected with or necessary to the management of a European Site and, therefore, it needs to be determined if the development is likely to have significant effects on a European site(s). The proposed development is examined in relation to any possible interaction with European sites designated Special Conservation Areas (SAC) and Special Protection Areas (SPA) to assess whether it may give rise to significant effects on any European Site in view of the conservation objectives of those sites.

Description of Site and Surroundings

7.8.14. The applicant provides a description of the site and its relationship to nearby designated European sites at section 1.2.3 of the Appropriate Assessment Screening Report. The Planning Authority’s Ecologist also provided a description of

the site in her report following a site visit on the 25th February 2022. I have also described the site at section 1.0 of my report above following a site inspection on the 4th August 2023. In summary, the site and surroundings may be described as follows:

- The site is located within the development boundary of Killarney Town and is on the edge of the built-up footprint. It is accessed from Ross Road, which is a main road leading south from the town centre towards Ross Castle and Lough Leane and serves residential, agricultural, recreational and commercial premises. Ross Road forms a significant portion of the western boundary of the Racecourse grounds, which is defined by a high stone wall.
- The proposed glamping site is located within the racecourse grounds at the northern end. It is enclosed to the west, north and east by the racecourse track and an internal circuitous road. It is bounded to the south by an existing golf course. Part of the development site currently forms part of the active golf course, and the remainder is open grassland.
- The habitats within the site comprise open amenity grassland within a racecourse complex and associated built grounds. The nearest ecological receptor is the River Flesk which flows alongside the eastern boundary of the racecourse complex.
- There are no trees of any significance within the boundary of the site of the proposed development or adjoining the development site. There is a stone wall along a c.500m stretch of the boundary of the racecourse grounds with Ross Road. There is a row of tall mature trees on the opposite side of Ross Road, which is parallel to the stone wall boundary of the racecourse site.

Brief Description of the Development

7.8.15. The applicant provides a description of the project at section 3.1 of the Appropriate Assessment Screening Report and further information received on 22nd September 2022. Additional information regarding habitats on the site and on the potential impacts on Lesser Horseshoe Bats is provided in the first party response to the grounds of appeal (15/12/22), which includes a letter from Southern Scientific.

7.8.16. In summary, the proposed development comprises:

- In order to facilitate the proposed development, the golf course will be redesigned where it overlaps the development site involving the relocation of any greens, holes and tee boxes affected. These works will be carried out as part of the golf course maintenance works.
- The installation of 15 no. prefabricated glamping pods on the site. The glamping pods will be installed onto foundations, which will consist of small strip footings (750mm x 300mm) running just below the top of the ground with block piers/walls 300mm-600mm high to support the glamping pods.
- Access will be gained from the existing entrance on Ross Road together with existing internal road network. Gravel parking areas will be provided as well as gravel footpaths linking the pods to the parking areas. Three parking areas are proposed comprising 5 spaces (NW), 7 spaces (SW) and 10 spaces (NE).
- A perimeter fence will be installed around the glamping site. Refuse stores will be provided to the rear of the parking areas and an LPG tank enclosure will be provided adjacent to carpark 01.
- Water to the site will be supplied via the existing water supply system on site.
- Wastewater from the glamping pods will be connected to the existing wastewater treatment system servicing the Racecourse site.
- Surface water collected from proposed development site will be discharged to ground via soakaways.
- The lighting plan for the development involves the use of low-level bollard lighting throughout for a minimum impact and a wall mounted light for each unit with the light cowled downwards.
- Two 'Activity Areas' are proposed, one at the northern end of the site and one to the east. The proposed 'Activity Areas' are intended as open areas for guests staying at the facility. They will be grassed areas with no fixed furniture.
- It is proposed to retain as many trees and shrubs as possible and to plant hornbeam trees throughout the site.

7.8.17. Taking account of the characteristics of the proposed development in terms of its location and the nature and scale of the works, the following issues are considered

for examination in terms of implications for likely significant effects on European sites:

- Construction related – potential for uncontrolled surface water contaminated with silt and/or construction related pollution.
- Habitat loss/reduction and/or fragmentation.
- Habitat disturbance and/or disturbance of qualifying interests during both construction and operational phases.

Submissions and observations

7.8.18. An Taisce (28/02/22) – evaluation is needed on the ecological impact of the proposal including night lighting and subsequent impact on bats and other species.

7.8.19. Irish Deer Society, Roundwood Co. Wicklow (01/03/22) – objection made on grounds of lack of ecological and biological surveys on and around the development, lack of support and consultation with other groups and residents and disruption and disturbance to deer species and their habitats particularly during the breeding season.

7.8.20. Public submissions included nineteen submissions to the planning authority as well as five third-party appeals and three observations on the grounds of appeal. The issues raised in relation to ecology and impact on the nearby National Park, habitats and protected species may be summarised as follows:

- The site is within 200m of the National Park. The noise and disturbance from activities associated with the development would have an adverse impact on the biodiversity of the area and on the Qualifying Interests of the SAC. These include species such as Deer, Otter, Foxes, Badgers, Voles and the Lesser Horseshoe Bat, which forage at the edge of the park.
- There are known roost sites for Lesser Horseshoe Bats at ‘Knockreer House’ and ‘Killarney House’ which are located approx. 1km and 1.36km from the development. LHS bats are known to commute between roosts and foraging areas and will be impacted by the noise and disturbance and by light pollution from the proposed development, during both construction and operational phases. There is a 500m long stretch of stone wall alongside the racecourse

grounds and a continuous line of 200-year-old trees which are likely to be used as commuting and foraging routes for these bats.

- The introduction of lighting associated with the proposed glamping use will have an adverse impact on commuting and foraging routes of the LHS bats.

European Sites

7.8.21. In determining the Zone of Influence, I have had regard to the nature and scale of the project, the distance from the development site to the European Sites, and any potential pathways which may exist from the development site to a European site. The site of the proposed development is not located within or immediately adjacent to a European Site. The closest European sites are the Killarney National Park, McGillicuddy Reeks and Caragh Catchment SAC (000365), approx. 200m distant, the Killarney National Park SPA (004038), approx. 300m distant, and the Castlemaine Harbour SAC (000343), approx. 7km distant.

7.8.22. A summary of the European Sites that occur within a possible zone of influence of 15km is presented in the table below. Where a possible connection between the development and a European Site has been identified, these sites are examined in more detail.

7.8.23. TABLE 7.1 Potential Impacts on European sites

European Site	Distance from proposed development	List of Qualifying Interests/Special Conservation Interest	Connections (source, pathway, receptor)	Considered further in screening Y/N
Killarney National Park, MacGillicuddy Reeks and Caragh River Catchment SAC (000356)	200m to north, west and south	Oligotrophic waters containing very few minerals of sandy plains (Littorelletalia uniflorae) [3110]	No	N
		Oligotrophic to mesotrophic standing waters with vegetation of the Littorelletea uniflorae and/or Isoeto-Nanojuncetea [3130]	No	N
		Watercourses of plain to montane levels with Ranunculion fluitantis and Callitricho-batrachion vegetation [3260]	No	N

		Northern Atlantic wet heaths with <i>Erica tetralix</i> [4010]	No	N
		European dry heaths [4030]	No	N
		Alpine and Boreal heaths [4060]	No	N
		<i>Juniperus communis</i> formations on heaths or calcareous grassland [5130]	No	N
		Calamarian grasslands of the <i>Violetalia calaminariae</i> [6130]	No	N
		<i>Molinia</i> meadows on calcareous, peaty or clayey-silt-laden soils (<i>Molinion caeruleae</i> [6410])	No	N
		Blanket bogs (*if active) [7130]	No	N
		Depression on peat substrates of the	No	N

		Rhynchosporion [7150]		
		Old sessile oak woods with Ilex and Bechnum in the British Isles [91A0]	No	N
		Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno- Padion, Alnion incanae, Salicion albae) [91E0]	No	N
		Taxus baccata woods of the British Isles [91J0]	No	N
		Geomalacus Maculosus (Kerry Slug) [1024]	No	N
		Margaritifera margaritifera (Freshwater Pearl Mussel) [1029]	No	N
		Euphydryas aurinia (Marsh Fritillary) [1065]	No	N

		Petromyzon marinus (Sea lamprey) [1095]	No	N
		Lampetra planeri (Brook lamprey) [1096]	No	N
		Lampetra fluviatilis (River lamprey) [1099]	No	N
		Salmo salar (Salmon) [1106]	No	N
		Rhinolophus hipposideros (Lesser Horseshoe Bat) [1303]	No	N
		Lutra lutra (Otter) [1355]	No	N
		Trichomanes speciosum (Killarney fern) [1421]	No	N
		Najas flexilis (Slender Naiad) [1833]	No	N
		Alosa fallax killarnensis (Killarney Shad) [5046]	No	N

Killarney National Park SPA (004038)	300m to west and south	Merlin (Falco columbarius) [A098]	No	N
		Greenland white-fronted goose (Anser albifrons flavirostris) [A395]	No	N
Castlemaine Harbour SPA (000343)	7km to south	Estuaries [1130]	No	N
		Mudflats and sandflats not covered by seawater at low tide [1140]	No	N
		Annual vegetation of drift lines [1210]	No	N
		Perennial vegetation of stony banks [1220]	No	N
		Vegetated seacliffs of the Atlantic and Baltic coasts [1230]	No	N
		Salicornia and other annuals colonising mud and sand [1310]	No	N

		Atlantic salt meadows (Glauco-Puccinellietalia maritimae) [1330]	No	N
		Mediterranean salt meadows (Juncetalia maritimi) [1410]	No	N
		Embryonic shifting dunes [2110]	No	N
		Shifting dunes along the shoreline with <i>Ammophila arenaria</i> (white dunes) [2120]	No	N
		Fixed coastal dunes with herbaceous vegetation (grey dunes) [2130]	No	N
		Dunes with <i>Salix repens</i> ssp. <i>Argentea</i> (<i>Salicion arenariae</i>) [2170]	No	N
		Humid dune slacks [2190]	No	N

		Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (Alno-Padion, Alnion incanae, Salicion albae) [91E0]	No	N
		<i>Petromyzon marinus</i> (Sea Lamprey) [1095]	No	N
		<i>Lampetra fluviatilis</i> (River Lamprey) [1099]	No	N
		<i>Salmo salar</i> (Salmon) [1106]	No	N
		<i>Lutra lutra</i> [1355]	No	N
		<i>Petalophyllum ralfsii</i> (Petalworth)	No	N

7.8.24. I do not consider that any other European sites fall within the zone of influence of the project, based on a combination of factors including the intervening distances, the lack of suitable habitat for qualifying interests, and the lack of a hydrological or other connection to the development site.

Identification of likely effects

Killarney National Park SPA

7.8.25. This site is designated for Merlin and Greenland white-fronted goose. There are no suitable sites for foraging or roosting within or in the vicinity of the development site. There are no potential hydrological or ecological pathways to the SPA.

7.8.26. I consider that there is no possibility of significant effects on Killarney National Park SPA (004038), having regard to the conservation objectives relating to the qualifying interests of these sites, due to distances between these sites and the site of the proposed development, the intervening land uses and the absence of any hydrological or other linkage between the development and this European site. I therefore concur with the applicant and am screening out this designated site at Stage 1.

Castlemaine Harbour SAC

7.8.27. This site is designated for the protection of a range of protected coastal, intertidal and estuarine habitats, Alluvial forests and Petalworth (bryophyte). It also includes long stretches of river and stream providing habitats for Salmon, Lamprey and Otter. The site also supports internationally important wildfowl populations, rare plant species and the Natterjack Toad. The development site is located 7km upstream from this SAC and a potential hydrological link exists via the River Flesk, Lough Leane and the River Laune to the SAC. Potential impacts arise during construction from runoff of sediment, nutrients and hydrocarbons. However, the hydrological connectivity is tenuous and weak having regard to the lack of any surface water links from the development site to the River Flesk, the distances involved and the dilution capacity of Lough Leane. There are no other ecological pathways to the SAC.

7.8.28. I consider that there is no possibility of significant effects on Castlemaine Harbour SAC (000343), having regard to the conservation objectives relating to the qualifying interests of these sites, due to distances between these sites and the site of the proposed development, the intervening land uses, the weak nature of the hydrological linkage and the absence of any or other linkage between the development and this European site. I therefore concur with the applicant and am screening out this designated site at Stage 1.

Killarney National Park McGillicuddy Reeks and Caragh River Catchment SAC

- 7.8.29.** This site has been designated for the protection of a wide range of habitats and species which are protected under the Habitats and Birds Directives. The site of the proposed development is located outside of the European site and there are no habitats of any significant ecological value within the site. There is no direct hydrological link, or any other ecological link, between the development site and the SAC. Thus, there would be no direct impacts on any habitats or species for which the site has been designated.
- 7.8.30.** Indirect impacts could arise to water quality through surface water runoff during construction. However, it is unlikely that this would result in any significant impacts to water quality as there are no drainage links to the river and due to the distance from the watercourse, as well as the nature and scale of the proposed development. It is noted that the applicant has stated that the proposed works would be carried out in accordance with best practice guidance, namely, CIRIA Guidelines – Control of Water Pollution from Construction Sites – Guide to Good Practice (2001) and Inland Fisheries Ireland – Guidelines on Protection of Fisheries during Construction Works in and adjacent to Waters (2016).
- 7.8.31.** There will be no direct loss or alteration of any habitats as the site is not within a European site. As stated above, significant water quality effects to the SAC can be excluded, which means that no significant effects to aquatic habitats listed as QIs are likely. No terrestrial QI habitats occur within the site and where such habitats occur in the vicinity, there are no ecological pathways connecting the site to these habitats. Thus, significant loss or alteration to the habitats for which the SAC is designated can be ruled out.
- 7.8.32.** The site is unsuitable for a number of the species for which the SAC has been designated, including Marsh Fritillary, Kerry Slug and Killarney Fern, as these species require very specific habitats. Otters may be present, particularly close to the river. Construction works may cause disturbance to this species, but otters are known to adapt to increased noise and activity levels by moving away. As the construction phase is likely to be of a short duration, and the site is well removed from the river, it is unlikely to cause any long-term impact on feeding or breeding behaviour for this species. It is unlikely that the operational phase would cause any

significant disturbance to otters, as the glamping site is contained within a fenced area away from the river and is to be managed and supervised at night.

7.8.33. The site is not suitable for Lesser Horseshoe Bat as there are no suitable buildings/structures on site and the site has an open landscape character, as befits a racecourse track. There are no roost sites within the site and the closest one is 1km away and is located deep within the Demesne woodland. As noted previously, LHS bats tend to avoid open landscapes and navigate between roost and foraging sites by means of linear features. There are no vegetative linear features, treelines, hedgerows or stone walls within or immediately adjoining the site. The closest features of this type are along Ross Road which is 35-45 metres away and separated from the site by a racetrack and road, which is characterised by a flat open landscape. Thus, there are no suitable sites for roosting or foraging within the development site and the character of the site (and immediately adjoining lands) is such that LHS bats would avoid flying through this space.

7.8.34. Notwithstanding the low likelihood of bats frequenting the site and surroundings, there is potential for disturbance to LHS bats as this species are impacted by lighting and the proposed development will involve the introduction of lighting into a relatively dark environment. However, the applicants have pointed out that the environment is not currently very dark as the adjoining Ross Road has street lighting, there are residential developments along Ross Road which are lit by public lighting and there are activities and events which take place within the racecourse grounds which are also lit by external lighting. The proposed development includes a scheme of low-level bollard lighting and wall mounted lights adjacent to each unit, which will be cowled and directed downwards. This will ensure that any bats in the vicinity will not be disturbed by lighting associated with the development.

7.8.35. In conclusion, it is considered that it is unlikely that any significant effects on the QIs of the designated sites will occur as a result of the proposed development in terms of disturbance or displacement of species or the loss, alteration or fragmentation of habitats.

In combination effects

7.8.36. The Screening Report addressed in combination effects (3.5.5). This included a review of planning applications in the area and of various plans. It was noted that

there were no policies or plans for the area and no planning applications that would interact with the proposed project in any significant way.

- 7.8.37.** Having reviewed the P.A.'s Planning Enquiry system, I would agree that the recent planning permissions in the vicinity relate primarily to single dwelling houses or small residential schemes. It is considered, therefore that in-combination effects have been adequately considered by the applicant. I am satisfied that the proposed development in combination with other permitted developments and plans in the area, which in themselves have been screened for AA, would not be likely to have a significant effect on any European site.
- 7.8.38.** In-combination effects have been considered by the applicant. I am satisfied that the proposed development in combination with other permitted developments and plans in the area, which in themselves have been screened for AA, would not be likely to have a significant effect on any European Site.

Mitigation Measures

- 7.8.39.** No measures designed or intended to avoid or reduce any harmful effects of the project on a European Site have been relied upon in this screening exercise.

Screening Determination

- 7.8.40.** The proposed development was considered in light of the requirements of Section 177U of the Planning and Development Act 2000 as amended. Having carried out Screening for Appropriate Assessment of the project, it has been concluded that the proposed development individually or in combination with other plans or projects would not be likely to have a significant effect on European Site No. 000365 Killarney National Park, MacGillicuddy Reeks and Caragh River Catchment SAC, European site No. 004038 or European Site No. 000343 Castlemaine Harbour SAC, or any other European Site, in view of the sites' Conservation Objectives. Appropriate Assessment is therefore not required.
- 7.8.41.** This determination is based on the following:

The small scale and nature of the development proposed, the distance of the proposed development from the European Sites, the lack of any suitable habitat for Qualifying Interests within the site and the demonstrated absence of ecological connections to a European Site.

8.0 Recommendation

- 8.1. It is recommended that planning permission be **granted** for the reasons and considerations set out below.

9.0 Reasons and Considerations

Having regard to the zoning of the site as 'Active Open Space' wherein glamping developments are open to consideration, to the location of the site within the built-up area of the town, in close proximity to the facilities and amenities available within the town centre, to the policy objectives of the current Kerry County Development Plan 2022 which seek to provide a variety of tourist accommodation and to direct glamping developments to urban locations, it is considered that the proposed development would be in accordance with these policy objectives, would not seriously injure the visual amenities of the area or the amenities of properties in the vicinity by reason of noise and general disturbance or depreciate the value of properties in the area, and would be acceptable in terms of traffic safety and convenience. The proposed development would, therefore, be in accordance with the proper planning and sustainable development of the area.

10.0 Conditions

1. The development shall be carried out and completed in accordance with the plans and particulars lodged with the application, as amended by the further plans and particular submitted on the 22nd day of September 2022 and by the further plans and particulars received by An Bord Pleanála on the 15th day of December 2022, except as may otherwise be required in order to comply with the following conditions. Where such conditions require details to be agreed with the planning authority, the developer shall agree such details in writing with the planning authority prior to commencement of development and the development shall be carried out and completed in accordance with the agreed particulars.

Reason: In the interest of clarity.

2. The use of the proposed glamping pods shall be restricted to use as short-term tourist accommodation only (as specified in the lodged documentation) and shall not be used as permanent residential accommodation.

Reason: In the interest of traffic safety and residential amenity.

3. The development shall be managed and supervised in accordance with a management scheme which shall be submitted to, and agreed in writing with the planning authority, prior to the occupation of the glamping pod units. This scheme shall provide adequate measures relating to

- (a) 24-hour supervision of the glamping site during periods of occupation
- (b) maintenance of the development including landscaping, roads, paths, parking areas, lighting, waste storage facilities and sanitary services
- (c) details of management responsibilities and maintenance schedules.

Reason: In the interests of the visual and residential amenities of the area.

4. The Activity Areas shown on the lodged plans shall be reserved for such use and shall be kept free of any development. These areas shall not be incorporated into any individual glamping pod unit.

Reason: In the interests of the amenity of the area.

5. (a) The Finished Floor Levels of the proposed glamping pod units shall be in accordance with the details submitted to the planning authority on the 22nd day of September 2022.
- (b) Details of the materials, colours and textures of all the external finishes to the proposed development shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.

Reason: In the interest of visual amenity.

6. The landscaping scheme shown on Drawing No. P200714-008-A as submitted to the planning authority on the 28th day of January 2022, as amended by plans and particulars submitted on the 22nd day of September 2022 shall be carried out within the first planting season following substantial completion of the external construction works.

The trees shall be of an Irish native species and shall be a minimum of 1.5 metres in height.

All planting shall be adequately protected from damage until established. Any plants which die, are removed or become seriously damaged or diseased, within a period of five years from the completion of the development shall be replaced within the next planting season with others of a similar size and species, unless otherwise agreed in writing with the planning authority.

Reason: In the interest of visual and residential amenity.

7. A signage and way finding scheme shall be submitted to and agreed in writing to the planning authority prior to occupation of the glamping pods.

Reason: In the interests of legibility of the scheme.

8. The construction of the development shall be managed in accordance with a Construction Management Plan, which shall be submitted to, and agreed in writing with, the planning authority prior to the commencement of development. This plan shall provide details of intended construction practice for the development, including hours of working, noise management measures and off-site disposal of construction/demolition waste.

Reason: In the interests of public safety and residential amenity.

9. Water supply and drainage arrangements, including the disposal of surface water, shall comply with the requirements of the planning authority for such works and services. Details of drainage arrangements including SUDs measures shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.

Reason: In the interest of public health.

10. Prior to the commencement of development, the developer shall enter into a water and wastewater connection agreement with Uisce Eireann.

Reason: In the interest of public health.

11. The developer shall pay to the planning authority a financial contribution in respect of public infrastructure and facilities benefiting development in the area of the planning authority that is provided or intended to be provided by or on behalf of the authority in accordance with the terms of the Development Contribution Scheme made under section 48 of the Planning and Development Act 2000, as amended. The contribution shall be paid prior to commencement of development or in such phased payments as the planning authority may facilitate and shall be subject to any applicable indexation provisions of the Scheme at the time of payment. Details of the application of the terms of the Scheme shall be agreed between the planning authority and the developer or, in default of such agreement, the matter shall be referred to An Bord Pleanála to determine the proper application of the terms of the Scheme.

Reason: It is a requirement of the Planning and Development Act 2000, as amended, that a condition requiring a contribution in accordance with the Development Contribution Scheme made under section 48 of the Act be applied to the permission.

I confirm that this report represents my professional planning assessment, judgement and opinion on the matter assigned to me and that no person has influenced or sought to influence, directly or indirectly, the exercise of my professional judgement in an improper or inappropriate way.

Mary Kennelly
Senior Planning Inspector

11th December 2023

Appendix 1 - Form 1
EIA Pre-Screening
[EIAR not submitted]

An Bord Pleanála Case Reference	ABP.315088-22		
Proposed Development Summary	Construction of glamping site comprising 15 glamping units, office, car parking, LPG tanks and enclosures, refuse enclosures and all ancillary site works.		
Development Address	Killarney Racecourse, Ross Road, Bunrower, Killarney, Co. Kerry		
1. Does the proposed development come within the definition of a 'project' for the purposes of EIA? (that is involving construction works, demolition, or interventions in the natural surroundings)		Yes	Yes
		No	No further action required
2. Is the proposed development of a class specified in Part 1 or Part 2, Schedule 5, Planning and Development Regulations 2001 (as amended) or does it equal or exceed any relevant quantity, area or limit where specified for that class?			
Yes			EIA Mandatory EIAR required
No	√	No	Proceed to Q.3
3. Is the proposed development of a class specified in Part 2, Schedule 5, Planning and Development Regulations 2001 (as amended) but does not equal or exceed a relevant quantity, area or other limit specified [sub-threshold development]?			

		Threshold	Comment (if relevant)	Conclusion
No		N/A		No EIAR or Preliminary Examination required
Yes	√	Class 12(d)/Threshold 100 pitches	Campsite threshold 100 pitches – proposed development 15 pitches	Proceed to Q.4

4. Has Schedule 7A information been submitted?		
No	√	Preliminary Examination required
Yes		Screening Determination required

Inspector: _____

Date: _____