



An
Bord
Pleanála

Inspector's Report

ABP-318648-23

Development	Construction of glamping facilities and all associated site works
Location	Doonbeg, County Clare
Planning Authority	Clare County Council
Planning Authority Reg. Ref.	23/496
Applicant(s)	Advanced Space Providers Ireland International Ltd.
Type of Application	Planning Permission
Planning Authority Decision	Refusal to Grant
Type of Appeal	First Party
Appellant(s)	Advanced Space Providers Ireland International Ltd.
Observer(s)	None
Date of Site Inspection	9 th October 2024
Inspector	Gary Farrelly

1.0 Site Location and Description

- 1.1. The subject site has a stated area of 0.12 hectares and is located within the village of Doonbeg, County Clare. The topography of the site slopes gently upwards from the south to the north part of the site and comprises of a number of mature trees on the northern and western sides of the site. The site is bounded by agricultural lands to the north, residential properties to the west and east and a boundary wall to the south, beyond which is the public footpath and road. An existing single storey property on the site also fronts Main Street.
- 1.2. The site is located on the northern side of Main Street, which is the national road N-67, and is located opposite a T-junction between the N-67 and L-2030.
- 1.3. Doonbeg Castle, which is a recorded monument (ref. CL047-019----) within the Record of Monuments and Places (RMP), is located approximately 50 metres from the eastern boundary of the site. A section of the eastern part of the site is located within a designated zone of archaeological potential associated with Doonbeg Castle.
- 1.4. The Doonbeg River is located approximately 60 metres east of the site and this flows northwards into Doonbeg Bay, which is designated as the Mid-Clare Coast Special Protection Area (SPA) (Site Code 004182) and the Carrowmore Dunes Special Area of Conservation (SAC) (Site Code 002250).

2.0 Proposed Development

- 2.1. Permission is sought to develop a glamping facility of 4 no. pods, the creation of a new access off Main Street and the provision of onsite parking. Each pod will have a floor area of 25sqm and their heights will be 2.77 metres. The external finishes of the structures are not specified. Car parking will be located to the front of the site in the southwest corner.
- 2.2. Permission is also sought to change the use of an existing building onsite from what is described as a cafeteria building, to an administration, greeting and meeting facility confined to the patrons of the proposed glamping site. An existing septic tank which serves the existing building onsite will be decommissioned and it is proposed to connect to the public sewer.

- 2.3. Surface water is proposed to be treated via an onsite soakaway and directed to the back of the site, as shown on the submitted site services layout plan. It is also proposed to connect to the public water mains.
- 2.4. A revised site layout plan, with no scale or dimensions illustrated, is submitted as part of the appeal documentation, proposing the relocation of the 4 no. structures to the eastern side of the site. A brochure entitled 'Wild Atlantic Rooms' is also submitted as part of the appeal documentation.

3.0 Planning Authority Decision

3.1. Decision

The planning authority (PA) issued a notification to refuse to grant permission for the proposed development, by Order dated 9th November 2023, for the following reasons:

1. *The objectives for Doonbeg as set out in the Clare County Development Plan 2023-2029 seek to provide for the sustainable growth of the village in a manner which reflects the distinctive character of the area in terms of scale, design and location. Having regard to the prominent and central location of the site within the village of Doonbeg, the views available towards the site from the south, the limited onsite screening and the design and layout of the proposed development, the Planning Authority considers that the proposed development is not in keeping with the existing built vernacular of Doonbeg village, would constitute a visually incongruous feature within the village, would be an undesirable departure from the existing settlement pattern of the area, and would seriously injure the visual amenities and character of the village. The proposed development would therefore be contrary to the objectives for Doonbeg and the proper planning and sustainable development of the area.*
2. *With regard to the protection of the amenities of the area, having regard to the nature of the proposed development and the proximity of the site to existing dwellings, on the basis of the available information the Planning Authority considers that that the proposed development would have adverse impacts on adjacent amenities by reason of noise and general disturbance, and therefore*

would not be in accordance with the proper planning and sustainable development of the area.

3. *The proposal site is located to the immediate north of the junction of the N67 national secondary road and the LP2030 local primary road. Having regard to the restricted visibility from the proposed access onto the national road due to parked vehicles to the east and west of the site, the nature and composition of the traffic that would be associated with the proposed development at operational stage, the deficiencies within the application with regard to street lighting, signage, pedestrian provision, traffic calming measures, integration works with the existing footpath and parking areas, and the non-demonstration of adequate onsite turning movements, the Planning Authority considers that the proposed development would endanger public safety by reason of a traffic hazard, would have adverse impacts on traffic safety and free flow on the adjacent public road junction, would not adequately facilitate safe and convenient movement of vehicles and pedestrians within the site, and therefore would not be in accordance with the proper planning and sustainable development of the area.*
4. *Objective CDP16.10 "Zones of Archaeological Potential" of the Clare County Development Plan 2023-2029 seeks to protect the Zones of Archaeological Potential as identified in the Record of Monuments and Places. The proposal site is partially within the zone of archaeological potential associated with Doonbeg Castle which is a recorded monument (Reference: CL047-019 Castle-Towerhouse) and works are proposed within this zone. On the basis of the available information, and in the absence of evidence to the contrary, the Planning Authority considers that the proposed development may have adverse impacts on existing sub-surface archaeological remains, would be contrary of objective CDP16.10 and would therefore be contrary to the proper planning and sustainable development of the area.*

3.2. Planning Authority Reports

Planning Reports

There is 1 no. area planner (AP) report which assessed the development in terms of, inter alia, archaeological and architectural heritage, visual amenities, wastewater and traffic issues. EIA was excluded at preliminary examination and a screening determination was not required. AA screening concluded that there was no likelihood for significant effects on any European Site. The AP report noted the planning status of the onsite café as unclear. Refusal of permission was recommended and this was endorsed by the Senior Executive Planner and Senior Planner.

Other Technical Reports

- Transportation and Road Design Office (report dated 29/09/23) – This report outlined that a road safety audit was required for any increase in traffic to the national road. The sightlines and sight stopping distances appeared to comply with DMURS. The car and bicycle parking did not meet the criteria of the CDP. A vehicle track analysis for a fire tender was also required.
- West Clare Municipal District (report dated 6/11/23) – This report noted that the applicant did not consult with the MD prior to making the application and recommended that in the absence of a traffic impact assessment and a road audit that the application should be refused on traffic and road safety grounds.

3.3. Prescribed Bodies

Transport Infrastructure Ireland (TII)

This report outlined no observations.

Department of Housing, Local Government and Heritage (Development Applications Unit)

This DAU report requested an archaeological impact assessment as further information and reminded the PA of its obligations regarding the conservation objectives of the European sites.

3.4. Third Party Observations

None

4.0 Relevant Planning History

None on subject site according to the PA's planning register and documentation on file.

5.0 Policy Context

5.1. Clare County Development Plan 2023-2029

Volume 3d West Clare Municipal District - Doonbeg

General Objectives

- To make provision for the sustainable growth of the village which will support existing services and encourage further expansion of the service base, whilst retaining its distinctive character.
- To ensure future development reflects the distinctive character of the area in terms of scale, design and layout.

Tourism

It is an objective:

- To support the development of a diverse tourism product which offers the potential to expand the tourism season to provide year-round employment and economic activity.

The subject site is zoned 'Mixed Use' under the Doonbeg settlement map.

Volume 1 Written Statement

Chapter 19 Land Use and Zoning

The use of land for 'mixed use' developments shall include the use of land for a range of uses, making provision, where appropriate, for primary and secondary uses e.g. commercial/retail development as the primary use with residential development as a secondary use. Secondary uses will be considered by the local authority having regard to the particular character of the given area. On lands that have been zoned 'mixed-use' in or near town or village centres, a diverse range of day and evening uses is encouraged and an over-concentration of any one use will not normally be permitted.

Short term tourist accommodation and glamping is considered 'open to consideration (OtC)' within the 'mixed use' zoning under Appendix 2 of Volume 1. An OtC use is a proposed use that will be open to consideration, but subject to particular considerations for example, compatibility with adjoining uses, scale or whether or not the proposal is prejudicial to the amenities of an area or the residential amenities of an adjoining property.

Objective CDP9.5 Visitor Accommodation

a) To promote, encourage and facilitate the provision of new visitor accommodation and the expansion/upgrade of existing hotels, guesthouses, B&Bs and other tourist accommodation at appropriate locations throughout the County, particularly in areas with existing services.

c) To support the development of new camping and glamping facilities and facilities for campervans/motor homes/touring caravans both within settlements and in rural locations at a variety of locations across the County. Sites in rural locations should be located in close proximity to, and have good connectivity to, existing tourism assets.

Objective CDP15.1 Biodiversity

d) To ensure that features of importance to local biodiversity are retained as part of developments and projects being undertaken in the County;

Objective CDP16.10 Zones of Archaeological Potential

To protect the Zones of Archaeological Potential located within both urban and rural areas as identified in the Record of Monuments and Places.

5.2. Regional Policy

Regional Spatial and Economic Strategy for the Southern Region

Regional Policy Objective (RPO) 53: Tourism

a. Enhance provision of tourism and leisure amenity to cater for increased population in the Region including recreation, entertainment, cultural, catering, accommodation, transport and water infrastructure inter alia;

5.3. National Guidance

- Framework and Principles for the Protection of the Archaeological Heritage (Department of Arts, Heritage, Gaeltacht and the Islands 1999)

5.4. Natural Heritage Designations

The subject site is not located within any designated site. The nearest sites are the Mid-Clare Coast Special Protection Area (SPA) (Site Code 004182) and the Carrowmore Dunes Special Area of Conservation (SAC) (Site Code 002250) which are located approximately 600 metres north of the subject site. The Tullaher Lough and Bog SAC (Site Code 002343) is located approximately 2km southwest of the subject site. This is also designated as a proposed Natural Heritage Area (pNHA).

The White Strand/Carrowmore Marsch pNHA is also located approximately 2km northeast of the subject site.

5.5. Environmental Impact Assessment (EIA) Screening

Having regard to the nature, size and location of the proposed development and to the criteria set out in Schedule 7 of the Planning and Development Regulations 2001, as amended, there is no real likelihood of significant effects on the environment arising from the proposed development. The need for environment impact assessment can, therefore, be excluded at preliminary examination and a screening determination is not required. I refer the Board to Appendix 1 regarding this preliminary examination.

6.0 The Appeal

6.1. Grounds of Appeal

A first party appeal was lodged to the Board on 6th December 2023. The grounds of appeal are summarised as follows:

- The pod system design is far better than substandard refurbished existing buildings and will use an existing café unit to create a more sustainable overall use for the new pods and existing service building.
- The scale and external finishes of the pods are simple and well detailed and are in keeping with other less well detailed modular structures in the immediate area.
- The units will exist within the active core of the town where visitors can take full advantage of the town and its infrastructure.

- The second reason for refusal appears meaningless and therefore no comment is provided.
- The character of the town is presently a hybrid of poor quality structures intermingled with poor quality mobile home schemes. The high specification modular system with an existing services structure will allow for a need to be fully established and for the town to take on new visitors and not in overcrowded caravan parks.
- A brochure of the units is enclosed and it is suggested that trees can be positioned along the boundary wall for screening purposes. A revised layout is provided repositioning the units.

6.2. Planning Authority Response

The PA noted the content of the first party appeal and respectfully requested the Board to uphold its decision to refuse planning permission for the four refusal reasons of its Order.

7.0 Assessment

7.1. Having examined the application details and all other documentation on file, including all of the submissions received in relation to the appeal, the reports of the planning authority and having inspected the site, and having regard to relevant local, regional and national policies and guidance, I consider that the substantive issues in this appeal to be considered are as follows:

- Principle of the Development
- Visual Amenity
- Residential Amenity
- Traffic Safety
- Archaeological Heritage

Principle of the Development

7.2. The site is located within the 'town centre' designation within the settlement boundary of Doonbeg on lands zoned 'Mixed Use' under the Clare County Development Plan 2023-2029 (CDP). The Board should note that short term tourist accommodation and glamping are considered 'open to consideration' under the CDP, subject to compatibility with adjoining uses, scale and whether or not the proposal is prejudicial to the amenities of an area or the residential amenities of adjoining properties.

7.3. Furthermore, I note that objective CDP9.5(a) and (c) of the CDP supports the development of glamping facilities within settlements and in areas with existing services. Additionally, RPO 53 of the Regional Spatial and Economic Strategy for the Southern Region (RSES) supports the provision of such accommodation in the region. Having regard to the zoning of the site and to the above objectives, I consider that the proposed development is acceptable in principle, subject to my assessment below.

Visual Amenity

7.4. The PA's primary reason for refusal is in relation to the impact of the development on the visual amenity and existing built vernacular character of Doonbeg village. It considered that the development was not in keeping with the settlement pattern of the area due to the design and layout of the scheme, to the prominent location of the site with available views from the south and to the absence of sufficient screening.

- 7.5. Within the grounds of appeal, the applicant stated that the structures are of high quality and are a better alternative than “*substandard refurbished existing buildings*”. The applicant also stated that the character of the town is a “*hybrid of poor quality structures intermingled with poor quality mobile home schemes*”.
- 7.6. Having inspected the site and village, the Board should note that I disagree with the applicant’s analysis of the town’s character. I observed the immediate area of the village around the subject site to comprise of well-maintained high quality vernacular buildings contributing to an attractive urban edge. The mobile homes referenced by the applicant are located approximately 150 metres west of the subject site and are located to the rear of a public house and graveyard and I noted that they were out of view from the Main Street. I also note that these mobile homes are located on ‘tourism’ zoned lands on the periphery of the settlement boundary.
- 7.7. I consider that the subject site represents a prominent and highly visible site within the village centre which is magnified due to its location at the junction of the N-67 and L-2030 which is directly opposite the site. Having regard to this, it is my view that the design and layout of the development should be cognisant of this prominent and visible location. Whilst I note that the PA had concerns that the development was not in keeping with the pattern of development of the area, it is my view that such glamping pods by their very nature would not normally accord with a settlement pattern of building frontage along the Main Street. However, regard must be had to the serviced nature of the site and its location within the settlement which is supported by objective CDP9.5(a) and (c) of the CDP.
- 7.8. Notwithstanding this, I am not satisfied that the applicant has provided sufficient mitigation such as a comprehensive landscaping proposal along the front boundary of the site to screen the development. I consider the applicant’s statement within the grounds of appeal in that “*trees can be positioned along the boundary wall for screening purposes*” is not an adequate response for a development of this nature and prominent location.
- 7.9. Furthermore, I note that the subject site benefits from established trees and hedgerow along the north and west boundaries, however, the application does not acknowledge this vegetation and the proposals do not confirm whether such vegetation is proposed

to be retained or removed. The Board should note that objective CDP15.1(d) of the CDP seeks to retain such features of local biodiversity importance.

- 7.10. Additionally, having reviewed the submitted drawings and 'wild Atlantic rooms' brochure, I note that the external finishes or colours of the structures are not specified or no photographs or examples of the subject structures are shown. Having regard to the absence of this information, to the high quality vernacular buildings in proximity and to the attractive main thoroughfare of the Main Street, I am not satisfied that it has been satisfactorily demonstrated that the proposed development would not be seriously detrimental to the built vernacular character of the immediate area.
- 7.11. Whilst I acknowledge and appreciate the role of tourism to the area of West Clare, and to the subject site representing a vacant and underutilised site within the village centre which is zoned 'mixed use' within the CDP, based on the information submitted, I am not satisfied that the proposed development would not negatively impact the visual amenities and character of Doonbeg village. Therefore, it is my recommendation to the Board that the PA's first reason for refusal is upheld.

Residential amenity

- 7.12. The PA's second reason for refusal relates to concerns regarding the impact of the development on residential amenity in the area in terms of noise and general disturbance. I note that the applicant has chosen not to respond to this reason for refusal.
- 7.13. I note that the subject site is surrounded by residential properties to the east and west of the site. However, having regard to the location of the site within the village centre, to the separation distance to neighbouring properties, the Board should note that I have no significant concerns regarding the impact of the development on residential amenity in terms of noise or general disturbance. Furthermore, I note that no third-party submissions were received as part of the application process.
- 7.14. Notwithstanding this, if the Board are minded to grant permission I consider that the PA's concerns could be addressed by condition which prohibits the playing of music and/or other events involving amplification equipment onsite, and that noise as measured at the boundaries of the site does not exceed 55dB(A) between the hours of 08:00 to 18:00 Monday to Friday and 45dB(A) at any other times.

Traffic Safety

- 7.15. The PA's third reason for refusal relates to traffic safety concerns due to restricted visibility as a result of parked cars and deficiencies in the application in relation to street lighting, signage, pedestrian provision, traffic calming measures and non-demonstration of turning movements. Again, I note that the applicant has chosen not to address this reason for refusal.
- 7.16. I note that the proposed development seeks to break open an existing boundary wall for a length of 5 metres to form a new access onto the national road where there are a number of existing obstacles such as road signage serving the vehicle users at the junction opposite the entrance, a lighting column and a number of on street car parking spaces directly in front of the proposed entrance. I note that the submitted drawings do not acknowledge these obstacles and/or where they would be relocated to or whether adequate sightlines are achievable. I also note that the applicant had no prior engagement with the Area Engineer or the Road Design section of the PA prior to submission of the application.
- 7.17. Therefore, having regard to the internal reports of the Road Design Section and Area Engineer of the PA and to the absence of information in relation to the reconfiguration of the street/junction, I consider that the applicant has not satisfactorily demonstrated that the proposed development would not result in an adverse impact in terms of traffic safety.

Archaeological Heritage

- 7.18. The PA's final reason for refusal is in relation to concerns that the works would have an adverse impact on sub-surface archaeological remains due to the works being located within the zone of archaeological potential associated with Doonbeg Castle (Ref. CL047-019----). It considered the development was contrary to objective CDP16.10 in this regard.
- 7.19. I note that the PA's archaeological conclusion was primarily based on the submission from the DAU which requested an archaeological impact assessment (AIA) as further information. I note that this included for test excavations and a visual impact assessment.

- 7.20. I acknowledge that it would have been difficult for the applicant to undertake an AIA and submit this as part of the appeal documentation due to the timelines involved in obtaining a licence and undertaking the work. However, I note that the applicant has not provided a response to this reason for refusal within its grounds of appeal.
- 7.21. Whilst I note that the proposals relate to modular units and by their nature would have a light footprint, the extent of the works are unclear from the submitted drawings. Therefore, having regard to my other recommended reasons for refusal, I also recommend that permission is refused on this basis due to the location of the site within the zone of archaeological potential and absence of a comprehensive archaeological assessment as required by the DAU.

Other Issues

Modified Development Proposal

- 7.22. The Board should note that the applicant has submitted a revised site layout as part of the appeal documentation which proposes to site all 4 no. units along the eastern boundary of the site. The scale of the drawing or the distances to the eastern boundary are not specified and therefore I consider the drawing deficient and not in compliance with Article 23 of the Planning and Development Regulations 2001, as amended, in this regard. I note that there were no third-party submissions received on the original layout before the PA and it is my view that the revised site layout plan would represent a material modification to what was before the PA and the public.
- 7.23. Notwithstanding the above, I do not consider that the revised layout would adequately address my concerns outlined above regarding the impact of the development on the vernacular heritage of the village or with regards to the absence of detailed design in relation to the reconfiguration of the junction.

8.0 Appropriate Assessment (AA) Screening

- 8.1. I have considered the project in light of the requirements of Section 177U of the Planning and Development Act 2000, as amended. The subject site is located approximately 600 metres south of the Mid-Clare Coast SPA (Site Code 004182) and the Carrowmore Dunes SAC (Site Code 002250).

- 8.2. The qualifying interests of SPA 004182 are the following: Cormorant (*Phalacrocorax carbo*) [A017], Barnacle Goose (*Branta leucopsis*) [A045], Ringed Plover (*Charadrius hiaticula*) [A137], Sanderling (*Calidris alba*) [A144], Purple Sandpiper (*Calidris maritima*) [A148], Dunlin (*Calidris alpina*) [A149], Turnstone (*Arenaria interpres*) [A169] and Wetland and Waterbirds [A999]. The qualifying interests of SAC 002250 are the following: Reefs [1170], Embryonic shifting dunes [2110], Shifting dunes along the shoreline with *Ammophila arenaria* (white dunes) [2120], Fixed coastal dunes with herbaceous vegetation (grey dunes) [2130] and *Vertigo angustior* (Narrow-mouthed Whorl Snail) [1014].
- 8.3. Having considered the nature, scale and location of the proposed development, I am satisfied that it can be eliminated from further assessment because there is no conceivable risk to any European site. The reason for this conclusion is as follows:
- Having inspected the site and having reviewed the Environmental Protection Agency's AA Mapping Tool, I note that there are no direct hydrological connections between the subject site and any European site.
 - To the modular nature of the proposed units.
 - To the connection of the development to the public wastewater network and to the available capacity within the Doonbeg wastewater treatment plant as outlined within its 2023 annual environmental report (AER).
 - To the treatment of stormwater via an onsite soakpit and via the back of the site. Having inspected the site I noted a ditch to the rear of the site which I consider likely connects to the Doonbeg river to the east of the site due to the topography of adjoining lands. However, having regard to the nature and scale of the development and to the level of dilution available within the Doonbeg river, I consider that no significant effects are likely.
 - Having regard to the separation distance from the European sites regarding any other potential ecological pathways and intervening lands.
 - Having regard to the built-up nature of the surrounding area, to the location of agricultural lands to the north of the site and distance to SPA 001482, I consider that no ex-situ effects are likely.

- Having regard to the PA's screening determination which considered that that there was no potential for significant effects on the European sites.

8.4. I consider that the proposed development would not be likely to have a significant effect individually, or in-combination with other plans and projects, on a European site and appropriate assessment is therefore not required.

9.0 Recommendation

I recommend to the Board that permission is **Refused** for the following reasons and considerations.

10.0 Reasons and Considerations

1. Having regard to the prominent location of the site within the village centre of Doonbeg, to the distinctive character of the immediate area which comprises of high quality vernacular buildings and an attractive main thoroughfare, to the design and layout of the proposed development, to the absence of any detail in relation to the proposed external finishes and materials, or in relation to the treatment of existing or proposed landscaping measures onsite, it is considered that the proposed development would be seriously detrimental to the vernacular character of the village and visual amenities of the area and would therefore contravene the general objectives for Doonbeg set out under Volume 3c of the Clare County Development Plan 2023-2029, specifically which seeks to ensure future development reflects the distinctive character of the area in terms of scale, design and layout. It is, therefore, considered that the proposed development would be contrary to the proper planning and sustainable development of the area.
2. Having regard to the location of the proposed access to the development off the national road N-67 directly opposite the junction with the local road L-2030 and to the absence of detailed design within the application with regards to the intended reconfiguration of the junction, the Board cannot be satisfied that the

proposed development would not endanger public safety by reason of a traffic hazard or obstruction of road users.

3. Having regard to the location of the site within a zone of archaeological potential associated with Doonbeg Castle (Record of Monuments and Places Ref. CL047-019----) it is considered that the archaeological significance of the site is such that any development of the site in advance of a comprehensive archaeological assessment, carried out to the requirements of the appropriate authorities, would be premature and would contravene objective CDP16.10 (Zones of Archaeological Potential) of the Clare County Development Plan 2023-2029 in this regard. It is, therefore, considered that the proposed development would be contrary to the proper planning and sustainable development of the area.

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.

Gary Farrelly
Planning Inspector

29th October 2024

Appendix 1

(a) Form 1: EIA Pre-Screening

An Bord Pleanála Case Reference	ABP-318648-23			
Proposed Development Summary	Glamping facility with onsite parking, change of use of building from café to administration building, decommissioning of existing septic tank and connection to public wastewater mains			
Development Address	Doonbeg Village, County Clare			
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	X	
		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) and does it equal or exceed any relevant quantity, area or limit where specified for that class?				
Yes			EIA Mandatory EIAR required	
No	X		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				No EIAR or Preliminary Examination required
Yes	X	Class 10(b)(iv) Urban development which would involve an area greater than 2 hectares in the case of a business district, 10 hectares	The subject site is located within an urban area that measures 0.12 hectares, and therefore	Proceed to Q.4

		<p>in the case of other parts of a built-up area and 20 hectares elsewhere.</p> <p>Class 12(d) Permanent camp sites and caravan sites where the number of pitches would be greater than 100.</p>	<p>well below the relevant threshold.</p> <p>A total of 4 no. glamping units are proposed.</p>	
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4. Has Schedule 7A information been submitted?		
No	X	Preliminary Examination required
Yes		Screening Determination required

(b) Form 2 - EIA Preliminary Examination

The Board carries out a preliminary examination [Ref. Art. 109(2)(a), Planning and Development Regulations 2001 (as amended)] of, at least, the nature, size or location of the proposed development having regard to the criteria set out in Schedule 7 of the Regulations.		
	Examination	Yes/No/ Uncertain
<p>Nature of the Development</p> <p>Is the nature of the proposed development exceptional in the context of the existing environment?</p> <p>Will the development result in the production of any significant waste, emissions or pollutants?</p>	<p>The development is located within an existing urban area on zoned 'mixed use' lands which will connect to the existing foul water mains. The nature of the development is not exceptional in the context of the existing village.</p> <p>A development of this scale and nature would consist of typical construction related activities and works.</p>	No
<p>Size of the Development</p> <p>Is the size of the proposed development exceptional in the context of the existing environment?</p> <p>Are there significant cumulative considerations</p>	<p>The development site measures 0.12 hectares. The size of the development is not exceptional in the context of the existing environment.</p> <p>Having reviewed the Department of Housing, Local Government and Heritage's National Planning Application database and EIA Portal and the Clare County Council's planning register, I note that there are no other plans or</p>	No

having regard to other existing and/or permitted projects?	projects for potential significant cumulative effects on the environment.	
<p>Location of the Development</p> <p>Is the proposed development located on, in, adjoining or does it have the potential to significantly impact on an ecologically sensitive site or location?</p> <p>Does the proposed development have the potential to significantly affect other significant environmental sensitivities in the area?</p>	<p>The subject site is not located within any designated ecological site.</p> <p>The nearest designated sites are the Mid-Clare Coast Special Protection Area (SPA) (Site Code 004182) and the Carrowmore Dunes Special Area of Conservation (SAC) (Site Code 002250) which are located approximately 600 metres north of the subject site. The Tullaher Lough and Bog SAC (Site Code 002343) is located approximately 2km southwest of the subject site. This is also designated as a proposed Natural Heritage Area (pNHA). The White Strand/Carrowmore Marsch pNHA is also located approximately 2km northeast of the subject site.</p> <p>My Appropriate Assessment screening above concludes that the proposed development would not likely have a significant effect on any European Site. I also consider that the proposed development would not have any impact on any national designations.</p> <p>The site is located within a zone of archaeological potential associated with Doonbeg Castle (RMP ref. CL047-019----) and whilst I have concerns regarding the potential impact in the absence of a comprehensive archaeological assessment as required by the DAU, these concerns are related to localised impacts and not considered significant in terms of the EIA Directive.</p> <p>The subject site is located outside Flood Zones A and B for fluvial/coastal flooding.</p>	No
Conclusion		
<p>There is no real likelihood of significant effects on the environment.</p> <p>EIA not required.</p>	<p>There is significant and realistic doubt regarding the likelihood of significant effects on the environment.</p> <p>Schedule 7A Information required to enable a Screening Determination to be carried out.</p>	<p>There is a real likelihood of significant effects on the environment.</p> <p>EIAR required.</p>