



An
Coimisiún
Pleanála

Inspector's Report ABP-322425-25

Development	6 glamping pods, conversion of barn into reception, common room, kitchen/dinning. Renovate existing building to shower room, games room. On-site effluent treatment systems and all associated site works.
Location	Dadreen, Killadoon, Louisburgh, Co. Mayo.
Planning Authority	Mayo County Council.
Planning Authority Reg. Ref.	24295.
Applicant(s)	Danielle Gallagher.
Type of Application	Permission.
Planning Authority Decision	Grant Permission.
Type of Appeal	Third Party.
Appellant(s)	John Brennan.
Observer(s)	None.
Date of Site Inspection	19 th June 2025.

Inspector

C. Daly.

1.0 Proposed Development

1.1. The proposed development, in summary, consists of the following:

- Construct 6 no. glamping pods.
- Conversion of barn into reception, common room, kitchen/dinning.
- Renovate and extend existing stone building to include accommodation, shower room, games room and storage.
- Car/bike parking and landscaping.
- Construct a dry bedded agricultural/machinery shed.
- On-site effluent treatment systems.

2.0 Site Location and Description

- 2.1. The subject site, of area 1.272ha., consists of two no. farm sheds clustered together around part of a farmyard area close to the site access with the public road and the remaining area of land consists of largely undulating open grassland with some mature trees along the western boundary and part of the northern boundary. The site is adjacent to the other part of the farm yard where there are three no. sheds. The main part of the site slopes downhill to the south and west. Part of the subject site is located on the other side of the public road to the west.
- 2.2. The site is located within Mweelrea/Sheeffry/Erriff Complex Proposed Natural Heritage Area and a short distance from Mweelrea/Sheeffry/Erriff Complex Special Area of Conservation to the west. There is a dormer dwelling adjacent to the site entrance. There is a watercourse running through part of the south-east area of the site.
- 2.3. The site is within a rural area c.0.9km from Silver Strand beach. The site is adjacent to an upland area to the east which leads up to Mweelrea Mountain and to Benn Lugmore. There are a number of beaches located along the coast in the vicinity to the west and north-west accessible from the local roads in the vicinity and the site is a short distance from the Wild Atlantic Way. The village of Louisburgh is c.12.5km to the north.

3.0 Planning Authority Decision

3.1. Decision

Mayo County Council initially decided to request further information in relation to a Site Location Map showing the nearest commercial enterprise of community facility, details in relation to the Site Suitability Report, section drawings in relation to invert levels for the wastewater treatment system and a site layout plan to demonstrate that minimum separation distances can be achieved within the site.

Following receipt of F.I. the P.A. decided to grant permission subject to 8 no. conditions. Notable conditions include:

- Condition no. 2 requires the glamping pods to be available for short terms up to 4 weeks only as a tourist type use.
- Condition no. 3 requires the effluent disposal to be in accordance with the EPA Code for small communities, business leisure centres and hotels.
- Condition no. 8 required all existing trees/hedgerows to be retained on site and additional screen planting of native deciduous trees and shrubs to be planted along all site boundaries including behind the new front boundary wall.

3.2. Planning Authority Reports

3.2.1. Planning Reports

The initial Planner's Report considered the proposal to be low impact tourist type accommodation in accordance with tourism recreation policy and policy for camping and glamping facilities. However, it recommended requesting further information in relation to showing where the nearest appropriate commercial enterprise or community facility is located and an updated Site Suitability Report. The report also notes that the Stage 1 assessment could not conclude that the proposal would not impinge on the SAC without detail on the design of the wastewater treatment system.

The second Planner's Report notes that a tourist related enterprise in close proximity has been identified and that the effluent disposal issues are adequately addressed. However, I note a second report from the Environment Section was not received. It

considered the proposal aligns with low impact tourist policy and policy for camping and glamping. It recommended that permission be granted subject to 8 no. conditions.

3.2.2. Other Technical Reports

- Area Engineer Westport: No objection.
- Environment (Water, air and noise): Recommended requesting further information in relation to the Site Suitability Report to include details of how population equivalent was calculated, full description of the type of treatment system proposed, amend reference to Cross Beach and Cross Lough (Killadoon) SAC; longitudinal sections to include invert levels for the system and a site layout plan to demonstrate separation distances can be achieved on the site with proximity to water courses shown. No second report was received.
- Archaeologist: No report received.
- Water Services: No report received.

3.3. Prescribed Bodies

- An Taisce: No report received.
- Uisce Eireann: No report received.
- DAU (Natural Heritage): No report received.
- DAU (Archaeology): No report received.
- The Heritage Council: No report received.

3.4. Third Party Observations

Two no. third party observation was received which can be summarised as follows:

- Concerns regarding impact on the character of the area.
- Concerns regarding environmental impact from increased traffic, waste disposal, light and noise pollution.
- The ground is solid rock which is unsuitable for wastewater treatment.
- The “Lost Valley” route has already put a strain on the local road network.

- There is no public mains water supply available in the area.
- Over tourism is a problem with the Wild Atlantic Way and careful management is required.
- The glamping facility is unlikely to benefit the local community and may displace existing businesses.
- The plans show car parking for 15 cars currently in a field which is across the public road which would be out of place and harmful to coastal views
- Concerns regarding absence of facilities in the area.
- Concerns regarding car dependency.
- A precedent will be set for additional pods with the dynamic changed to a large commercial venture.
- There is no supporting infrastructure.
- Concerns regarding condition of the public road and access.
- Policy is for the consolidation of tourism development in towns and villages.

4.0 Planning History

Subject Site

None located.

Sites in the Vicinity

23165: Permission granted by the P.A. at adjacent site for alterations to existing dwelling house to provide an independent living unit/granny flat

5.0 Policy Context

5.1. Mayo County Development Plan 2022-2028 (the CDP)

The subject site is not zoned. The site is located within Landscape Policy Area 3. Under this policy area, commercial development is stated to have a “*medium potential to create adverse impacts on the existing landscape character. Such developments are likely to be clearly discernible and distinctive, however with careful*

siting and good design, the significance and extent of impacts can be minimised to an acceptable level”.

Volume 1

Chapter 5 – Tourism and Recreation

TRO 16 Tourism Accommodation Objectives

To ensure that tourism related accommodation such as holiday homes, hotels, caravan/camping parks, glamping etc. are primarily located within existing settlements where there is existing infrastructure provision to service the development and where they can contribute to maintenance of essential rural services.

Certain forms of low-impact tourist accommodation such as Camping and Glamping/Pod sites may also be considered outside of existing settlements where it is:

- Proposed to incorporate the reuse an existing structure as an integral part of the development.*
- Adjacent to, and capable of availing of, an existing appropriate commercial enterprise or community facility or located on an existing farm*

In all cases the facility shall be of an appropriate scale for the location and shall have a high standard of design, layout, landscape, including Sections 6.2 and 6.3 of the Development Management Standards (Volume 2), and environmental protection so as not to impact negatively on the visual and residential amenity of the area or have significant adverse effects on the environment, including the integrity of the Natura 2000 network.

TRO 2 *To enable, facilitate and encourage the growth and sustainability of the tourism sector, through supporting the provision of tourism enterprise developments in rural areas including open farms, subject to the provision of adequate infrastructure and compliance with normal planning considerations.*

TRP 7 *To encourage the clustering of tourism products and services within identified hubs, to facilitate the sharing of infrastructure and services where possible, to increase linkages within and reduce leakage from the local economy.*

Chapter 10 – Natural Environment

NEP 1 *To support the protection, conservation and enhancement of the natural heritage and biodiversity of County Mayo, including the protection of the integrity of European sites, that form part of the Natura 2000 network, the protection of Natural Heritage Areas, proposed Natural Heritage Areas Ramsar Sites, Nature Reserves and Wild Fowl Sanctuaries (and other designated sites including any future designations).*

NEO 4 *To protect and enhance biodiversity and ecological connectivity in County Mayo, including woodlands, trees, hedgerows, semi-natural grasslands, rivers, streams, natural springs, wetlands, stonewalls, geological and geo-morphological systems, other landscape features and associated wildlife, where these form part of the ecological network.*

NEP 14 – *To protect, enhance and contribute to the physical, visual and scenic character of County Mayo and to preserve its unique landscape character.*

NEO 25 *To consider applications for development, along Mayo's Scenic routes, that can demonstrate a clear need to locate in the area concerned, whilst ensuring that it:*

- *Does not impinge in any significant way on the character, integrity and distinctiveness of the area.*
- *Meets high standards in siting and design.*
- *Contributes to and enhances local landscape character.*
- *Satisfies all other criteria, with regard to, inter alia, servicing, public safety and environmental considerations...*

NEO 26 *To consider applications for development, within Mayo's Coastal Areas and Lakeshores and within areas along scenic routes with designated scenic views, that can demonstrate a long-standing social link to the area concerned, whilst ensuring that it:*

- *Does not impinge in any significant way on the character, integrity and distinctiveness of the area.*
- *Cannot be considered at an alternative location.*
- *Meets high standards in siting and design.*
- *Contributes to and enhances local landscape character.*
- *Satisfies all other criteria, with regard to, inter alia, servicing, public safety and environmental considerations.*

NEO 27 *To ensure all development proposals are consistent with the Landscape Appraisal of County Mayo and the associated Landscape Sensitivity Matrix and future editions thereof.*

NEP 15 *To protect the character, visual, recreational, ecological and amenity value of the coast and provisions for public access, while recognising the needs of coastal communities to live, work and interact with the coast.*

Volume 2

Section 2.10 Effluent Treatment Systems

In un-serviced rural areas where a proposed dwelling cannot connect to the public wastewater treatment plant, a site suitability assessment will be required. The assessment must be carried out in accordance with the EPA Code of Practice Wastewater Treatment and Disposal Systems Serving Single Houses and take into account the cumulative effects of existing and proposed developments in the Area.

Section 6.3 Camping, Glamping/Pods Facilities

Certain forms of low-impact tourist accommodation such as Camping and Glamping/Pod sites may also be considered outside of existing settlements where it is:

- *proposed to incorporate the reuse an existing structure as an integral part of the development.*

- *adjacent to, and capable of availing of, an existing appropriate commercial enterprise or community facility.*
- *located on an existing farm.*

In all cases the facility shall be of an appropriate scale for the location and shall have a high standard of design, layout, landscape and environmental protection so as not to impact negatively on the visual and residential amenity of the area or have significant adverse effects on the environment, including the integrity of the Natura 2000 network.

5.2. National Policy

- EPA Code of Practice 2021: “Domestic Waste Water Treatment Systems (Population Equivalent ≤ 10)”. (The EPA Code).
- Wastewater Treatment Manuals – Treatment Systems for Small Communities, Business, Leisure Centres and Hotels (1999). (The EPA Hotels Code).

5.3. Natural Heritage Designations

In relation to designated sites, the subject site is located:

- Within part of the Mweelrea/Sheeffry/Effiff Complex Proposed Natural Heritage Area (PNHA) (site code 001932).
- c.0.16km north of Mweelrea/Sheeffry/Effiff Complex Special Area of Conservation (SAC) (site code 001932).
- c.1.2km north-east of West Connacht Coast SAC (site code 002998).
- c.2.4km north-east of Inishdegil Islands PNHA (site code 001511).
- c.4.2km east of Frehill Island PNHA (site code 001504).

6.0 The Appeal

6.1. Grounds of Appeal

The grounds of the third-party appeal by John Brennan can be summarised as follows:

- The proposal is an isolated stand-alone development in a remote rural area far removed from established services and essential services. The nearest village offers only a single shop and two pubs.

- The development is car borne in nature without public transport available.
- The area is of high scenic amenity and to allow development will have a significant negative impact on the visual amenity of the area.
- A precedent will be set for additional pods into the future and the dynamic will be changed to a large commercial venture like a caravan park.
- The site is within proximity to protected sites.
- The proposal contravenes Development Plan policies relating to rural development, landscape protection and sustainable tourism.
- The proposal would fail to integrate and is haphazard development.
- The site is unzoned agricultural land.
- The public road is not in good condition and not capable of accommodating additional traffic and there is already a strain on the local narrow road from the Wild Atlantic Way and 'the Lost Valley' route.
- Key Tourism Pillar 5.4.3 suggests accommodation for festivals and events including by glamping but there are no festivals near or relevant.
- The plans include bathrooms remote from the glamping pods.
- The scale of development is excessive and the combined massing will have a significant adverse visual impact on the scenic character of the area.
- There is very limited potential for screening given the prevailing gale force winds.
- The car park will detract significantly from the visual amenity of the area and the location of the car park was not addressed by the P.A..
- Over-tourism is a feature of the area and tourism should be managed sustainably.
- There is no supporting infrastructure given the remote location.
- The car park location across the road implies road safety issues.
- Concerns in relation to noise and light pollution and traffic generation that will negatively impact on residential and rural amenity.

- The site borders Machair and Natura 2000 sites with rigorous assessment required to allow any proposed development.
- A stream borders the southern boundary and there are concerns in relation to the on-site wastewater treatment system and impacts on water quality and the site is predominantly solid rock.
- Potential impacts on biodiversity have not been addressed.
- Concerns in relation to inappropriate location of the development are supported by the Inspector's Report per ABP-318430-23.
- Issues raised in relation to the farming type pursued by the applicant and in relation to the ability to recoup such a large investment.
- Photos submitted of the adjacent pathway, site from the path and the road in the vicinity and of higher ground to east.

6.2. Applicant Response

The response of the applicant, Danielle Gallagher, can be summarised as follows:

- The glamping pods are to support the family farm.
- This enterprise will be successful and create local job opportunities.
- The objections are personal in nature.
- The nearest village has two shops, two pubs, three cafes and two evening dining facilities along with a newly relocated butchers, post office, hardware and agri-store, a library, a garda station, 4 schools, a hairdresser, an outdoor recreation store and a chemist providing ample services for tourists.
- There is a pub and restaurant 7.2km away which is open all year round.
- The car borne nature of the development is consistent with the nature of development in rural Ireland.
- The scenic nature of the area means the development will be a success with the area having experienced increased footfall in recent years.
- An extensive ecological report was submitted given the location adjacent to an SAC and a further revised ecological report was submitted.

- The proposal complies with Development Plan policies.
- Two existing structures will be upgraded and maintained and the site is 1km away from 'The Lost Valley'.
- The unzoned land allows for flexibility in how it can be used.
- The public road is well maintained by the county council.
- There are 3 local festivals in the area and holiday rentals are available and are at full capacity.
- There are washing and bathroom facilities in all the pods and there is provision for a 30 pe wastewater treatment facility.
- The pods are small on a site area of 1.96 acres and would not be excessive in scale or massing with no adverse visual impact.
- Some trees fell during Storm Eowyn and none of the wooded trees fell.
- Concerns regarding over-tourism are void as the Wild Atlantic Way was introduced to boost tourism with the local community reliant on this.
- The on-site car park referred to relates to the car park for the pod guests and the other car park is an overflow space and cars already park on the grass verges and block the road.
- There would be no significant noise or light levels.
- The two ecological assessments show no potential threats were found.
- Damage to the Machair area is from camping and social activities at the beach and from no toilet facilities.
- Enterprises in the area include Horse Back West (horse riding) 3.7km away and The Misunderstood Heron 7km away. The Big Style enterprise is a water sports company operating in the area.
- The applicant is an organic farmer for the last 3 years with Certificate of Registration attached.
- Grants are available for this enterprise.

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 local authority, and having inspected the site, and having regard to the relevant local/regional/national policies and guidance, I consider that the substantive issues in this appeal to be considered are as follows:

- Principle of Development
- Visual Impact
- Ecology
- Access and Parking
- Public Health
- Drainage

7.2. Principle of Development

7.2.1. I note the location within an unzoned remote rural and agricultural area of County Mayo. I note Section 6.3 of the CDP in relation to Glamping pods where it states, *Certain forms of low-impact tourist accommodation such as Camping and Glamping/Pod sites may also be considered outside of existing settlements where it is:*

- *proposed to incorporate the reuse an existing structure as an integral part of the development.*
- *adjacent to, and capable of availing of, an existing appropriate commercial enterprise or community facility.*
- *located on an existing farm.*

In all cases the facility shall be of an appropriate scale for the location and shall have a high standard of design, layout, landscape and environmental protection so as not to impact negatively on the visual and residential amenity of the area or have significant adverse effects on the environment, including the integrity of the Natura 2000 network.

- 7.2.2. The proposed development would re-use and incorporate two existing farm buildings/sheds into the reception area and for uses including common room, kitchen/dinning and shower room and games room. This being located on an existing farm would in my view represent a sustainable re-use of these structures given the location of the tourist accommodation within a scenic area close to the beach.
- 7.2.3. I note the submitted Amenities Plan which details the location of Surf Mayo, The Lost Valley, the Horseback West Riding School and Stables, Summer SUP and Kayak School and Big Style Water Sports along the route to the site from Louisburgh and the commercial facilities in Louisburgh including shops, restaurants, hotel and pub. I also note the amenity offered by the nearby beach and coastal area including for fishing and other leisure activities. I consider that a sufficient number of these facilities would be within reasonably close proximity (c.7km) to the subject site while Louisburgh would be a greater distance from the site with its additional facilities. On this basis, I consider that the users of the proposed development would be capable of availing of an existing appropriate commercial enterprise or community facility such as the riding school. I also note the applicant's appeal response refers to a number of festivals in the wider area which create some demand for tourist accommodation.
- 7.2.4. I have also noted further below in my assessment that the proposed development would not negatively impact on the visual amenity of the area. I note the Inspector's Report referred to by the appellant in relation to the inappropriate location for this development and the purported absence of retail and social facilities. However I do not consider that the circumstances are similar in this case with support facilities available in the vicinity of the site for tourists. I therefore do not consider that a precedent arises meriting refusal of permission in relation to the location of the development. On this basis I consider the proposed development to be consistent with Section 6.3 of the Development Plan for glamping pods such that I consider the principle of development to be acceptable at this location subject to the below assessment. I have addressed the concerns raised in relation to car dependency in section 7.5 below. Based on my below assessment where I have noted significant environmental impacts cannot be ruled out, I note this would be contrary to Policy Objective TRO16 for tourism accommodation.

7.3. Visual Impact

- 7.3.1. I note the appellant has noted issues related to the scale and massing which he considers to be excessive and that the combined massing will have a significant adverse visual impact on the scenic character of the area. He also notes that the potential for screening by the use of tree planting is limited given the prevailing gale force winds. I note the CDP seeks good siting and design noting the site location within Landscape Policy Area 3. Having visited the site and surrounds, I note the undulating nature of the site and surrounds and I note the scenic landscape in the vicinity and views of the coast available from the site.
- 7.3.2. In relation to the machinery shed for the proposed development, I note that this would be located adjacent to the existing farm yard and would be located among existing trees such that there would be a negligible visual impact from it in the rural agricultural setting. In relation to the extension to the existing stone shed type building, I note that the design form and elevation treatments would be consistent with the existing traditional agricultural design including the new window and entrance openings. The location adjacent to the existing would appropriately limit any increased visual impact on the site.
- 7.3.3. In relation to the conversion of the farm shed building to a reception, I note that while this building is of significant scale on the site, I observed its visibility to be very limited outside the site due to the undulating topography and the trees to the west and north-east. The design, in my view, would significantly enhance the appearance of the structure on the site by upgrading a rundown agricultural building and given the large blank concrete façade in part and, together with the glamping pods in corrugated metal, I consider that these structures would visually integrate with the agricultural building forms on the site while not being excessively scaled and I note the very limited visual impact that would arise outside the site where views, at most, would be intermittent and mostly from a distance, except from some parts of the track adjacent to the south.
- 7.3.4. I do not agree with the appellant that there is very limited potential for screening given the prevailing gale force winds. In this regard, I note the mature trees located on the subject site at its western end, the proposed additional planting within the site including to the west and south of the reception building and intermittently around the

glamping pods area and along part of the eastern boundary, and also the woodland located to the east of the proposed overflow car park.

- 7.3.5. In relation to the visual impact of the overflow car park, I consider that this can be adequately screened and integrated on to the separate part of the site given its modest scale should the Board decide to grant permission for this element.
- 7.3.6. Overall, noting the proposed site layout including the new building and access routes, I consider that the proposed development would integrate with the agricultural buildings on the site and would not be visually obtrusive in the landscape given the limited visibility that would arise from outside the site, mostly from a significant distance from the site. I note the proposal would also re-use two of the existing agricultural structures on the site.
- 7.3.7. I consider that the visual impact would be consistent with CDP policy and objectives in this regard including NEP 14, NEO 25, NEO 26, NEO 29 and NEP 15 given that it would not impinge on the natural landscape in any significant way excepting ecological and related impacts which will be dealt with separately below.

7.4. Ecology

- 7.4.1. I note the concerns of the appellant in relation to ecological issues including biodiversity loss, impact on the stream which runs through part of the site, noise and light pollution, over-tourism and traffic generation that he considers will negatively impact on the rural area. I note the site is located within the Mweelrea/Sheeffry/Erriff Complex PNHA (site code 001932). I note the submitted Appropriate Assessment of Protected Sites Screening Report prepared by Sitecheck in January 2025 where no significant environmental impacts on this protected site were identified. I will deal with impacts on European sites and issues in relation to the water framework directive separately below. I note the P.A. raised no significant issues in relation to the PNHA site and the appellant has not raised a specific ecological issue outside of water quality impact.
- 7.4.2. While noting the location within the Mweelrea/Sheeffry/Erriff Complex PNHA, other than my below concerns in relation to water quality in Section 7.6, I have no other ecological grounds of concern in relation to the impact of the development on the PNHA such as in relation to impacts on the biodiversity of the site. Given the failure to demonstrate that wastewater can be disposed of on the site in accordance with

the EPA Code, I consider that it cannot be ruled out that there would be no significant adverse impact on the integrity of the Mweelrea/Sheeffry/Erriff Complex PNHA and this is contrary to policy NEP 1 of the Development Plan and is unacceptable.

7.5. Access and Parking

- 7.5.1. I note the appellant has raised concerns in relation to access. The subject site is in two parts separated by the public road. I note the road network in the vicinity of the site and between the site and Louisburgh is characterised by what are effectively single lane roads for a significant distance south of a point around the Church of the Holy Family, Killeen. There are many points along this section of road to pull in for other vehicles to pass and I note the undulating nature of the roads also. For a tourist type development such as that proposed, for glamping, where the winter season would be avoided, and where the number of glamping pods would not result in a significant increase in traffic on the road network in the tourist season, I am satisfied that the local road network would be adequate for this type of development.
- 7.5.2. The appellant notes that the proposed development would be heavily reliant on transport by private car. Noting the nature of the development and its location in a remote rural area, I consider this reasonable and I note that no unsustainable commuting patterns would arise given the modest nature of the development and that it would be predominantly be accessed by tourists.
- 7.5.3. The main vehicular entrance would be via the existing farmyard entrance. I note the road undulates and curves in the vicinity of this entrance and that the public road is one lane wide. Noting the limited forward visibility for motorists, I consider its condition in the vicinity of the entrance to be such that practical vehicular speed on this stretch of road would be no greater than 30kph for safety and practicality reasons and this is what I observed from other motorists on my site visit. I note the Area Engineer had no objections. On this basis, I am satisfied that the sightlines of 30m in both directions at the existing entrance would be adequate to cater for the proposed development.
- 7.5.4. I note that a one-way internal road is proposed leading down to the western end of the site where it meets the public road. A new vehicular exit is proposed at this point where sightlines would be adequate (70m in both directions) and vehicular speeds

are severely limited due to the condition and width of the road in the vicinity as outlined above. I note some limited tree removal would be required at this point and I consider this would be reasonable and proportional with no undue loss of trees proposed. Accordingly, I am satisfied that the proposed vehicular access would be adequate in terms of traffic safety.

7.5.5. In relation to car parking, I note that 7 no. spaces would be provided to the west of the barn reception and that there would be set down space for two cars to the front of the reception. On the basis of 6 glamping pods and the barn accommodation, with one space to be provided per accommodation unit, or one space per pod and a 7th space for the barn conversion, I consider that this would be adequate to cater for the tourist visitors and this would be consistent with Table 7 (Car Parking Standards) of Volume 2 of the CDP.

7.5.6. I note that an overflow car park is proposed on part of the site across the public road to the west. This includes provision for 15 no. spaces. On the basis of the CDP parking standards, this would be significantly in excess of the standard. Given that adequate parking would be provided for on the main part of the site, I consider that there is no basis for this overflow / additional parking area. Should permission be granted, I recommend that the separate car parking area be omitted by condition.

7.6. Public Health

7.6.1. I note the appeal raises issues in relation to inadequate wastewater treatment including that the site is above rock. The F.I. letter from Jennings Surveying notes the population equivalent is 15 with the percolation sizes to be amended. I consider it appropriate to have regard to the EPA Code of Practice Domestic Wastewater Treatment (Population Equivalent ≤ 10), 2021 despite the fact that it relates mainly to domestic treatment plants. This is because it sets out a relevant means for site assessment and selection, installation and maintenance of appropriate wastewater treatment systems and is the most recent EPA publication. I note it sets out methodology for trial hole and percolation tests and it provides examples for site characterisation forms and is therefore applicable to the subject proposal as well as the Wastewater Treatment Manuals – Treatment Systems for Small Communities, Business, Leisure Centres and Hotels (1999) which is applicable given the P.E. equivalent of 15 and the type of development.

- 7.6.2. The Site Characterisation Form submitted at F.I. stage notes the site is located above a regionally important aquifer with a vulnerability rating of “extreme”. A groundwater protection response of R(2)(1) is identified. On this basis, per the EPA Code for Domestic WWTS Table 6.2, per the documentation submitted, I note based on the submitted form, the site is suitable for the proposed tertiary treatment system and soil polishing filter noting the 1.6m trial hole depth (at which bedrock was encountered).
- 7.6.3. The report notes sandy silt with cobbles unsaturated (red brown in colour) to a depth of 0.6m and from 0.9m and below before water it notes varied unsaturated gravel with sand and angular cobbles (blue grey). The report found the subsurface percolation (T) value of 17 and the surface percolation (P) value of 15. However, I note the sloping area of the site where the WWTP and polishing filter is proposed and in this context, also noting what appeared on visual inspection to be poorly draining water ground conditions, it may be the case that significant ground works to raise ground levels is required for the WWTP. I note the failure to demonstrate how the WWTP would sit on the site through the provision of adequate plan and section drawings showing the position and area of the soil polishing filter and invert level. I also note the EPA Code notes that site conditions can be considered in the assessment of the site.
- 7.6.4. The submitted report notes no group water schemes located within 1km. Silver Strand beach is noted to be 1km away and it notes a “stream to boundary to west” which I note flows to the beach area. No wells or springs are noted on the site and the vegetation is noted to consist of grass and rushes. The report noted some pockets holding water over the farm. In relation to required separation distances, per Table 6.3 of the EPA Code, while it would appear there are no issues with separation distances, this is based on a lack of full detail in relation to the percolation area and how it would sit on the site. I note the original ‘Proposed Site Layout Plan’ shows a change in levels of c.1.5m over the indicative area in which it would be located. However, the proposed system is for a commercial development where the PE (population equivalent) would be 15.
- 7.6.5. The submitted report notes that for 6 no. 3 person pods with 50 litre per person per day per the EPA Manual for Small Communities, Business, Leisure and Hotels, and that the converted wool barn is calculated for 4 people with 150 litre per person per

day and it states that “*the BOD loadings require a total population as 15*”. Based on these figures this gives a total loading of 1,500 litres. I note this basis of calculation is consistent with Table 3 from the EPA Hotels Code. Per Table 4 of this code a 28m separation distance is required from existing development and while it appears this may be possible, there is a lack of definition on the drawings in relation to the percolation area and no specific demonstration of adequate separation distances.

- 7.6.6. I note the Council’s Environment Section first report noted blue grey soils encountered to be indicative of saturated soils. It also noted water in the trial hole including a photo of same and noted the water table was recorded at 0.6m below ground level. This would correspond with a high water level on the site. I note the invert level of the trench/bed gravel or drip tubing is noted at -700.00 and a surface area of 56.25sqm is proposed for PE capacity of 15. The hydraulic loading rate is noted to be 26.7. Per Table 6, the hydraulic loading rate is noted between 40-60. However, no section drawings have been submitted in this regard to demonstrate this and I note the percolation area is generally defined on the site but not specifically drawn on the site layout plan. I note that such percolation areas are required to be detailed in relation to separation distances to demonstrate their appropriateness for the area and I note a failure to demonstrate this to sufficient detail in the submitted documentation with an absence of detail in relation to site levels.
- 7.6.7. I note per Table 7 of the EPA Hotels Code notes a media depth of 1.8m to 2.4m for low rate percolating filters and from 1.2m to 1.8m for high rate filters. However per the submitted Site Characterisation Form, the depth of unsaturated soil and/or subsoil beneath the invert of gravel is noted to be 0.9m. Based on its approximate position, I note that it would be c.30m from the boundary with the adjacent dwelling house and c.13m from the adjacent watercourse. However, I note it has not been demonstrated how this position on the site can be achieved including by reference to site levels. I also note that while the second Planner’s Report refers to the receipt of a second report from the Council’s Environment section, that there is none on file despite our request for the full planning file.
- 7.6.8. While I was unable to observe the trial hole on the site, I note the undulating slopes on the site and the mix of grass and rushes and the observations of the Council’s Environment section in relation to water observed in the trial hole and significant

issues requested to be addressed by way of F.I.. Overall, as noted above the EPA Code of Practice for Domestic Wastewater Systems is of relevance. I consider that, based on the information on the file, that the ground conditions observed are indicative of a high water level on the site with poorly draining water having been observed. I noted the failure to demonstrate how the WWTP would sit on the site through the provision of adequate plan and section drawings showing the position and area of the soil polishing filter and invert level. I consider that I cannot therefore rely on the indicative position of the percolation area in relation to whether adequate separation distances can be achieved.

- 7.6.9. On this basis, I am not satisfied that the applicant has demonstrated adequate ground conditions for compliance with the EPA Code of Practice as required and as a result I consider that it has not been demonstrated that a threat to public health would arise should permission be granted in this circumstance. I note that the issue of inadequate wastewater treatment was raised in the appeal and that the applicant had an opportunity to respond to this part of the appeal and I do not consider this to be a new issue. Accordingly, I note that the proposed development would be prejudicial to public health and thus contrary to Section 2.10 of Volume 2 of the CDP and I recommend that permission be refused in relation to this issue.

7.7. Drainage and Water

- 7.7.1. In relation to drainage matters, I note that a soakpit is included. I have reviewed the OPW flood maps and I note the site is not subject to flooding. Noting the topography of the site and the proposed layout, I consider that, should permission be granted, a standard SUDS drainage condition should be required to ensure drainage is catered for on site.
- 7.7.2. In relation to water supply, it is proposed to access the private well available on site. I note the submitted Quality and Quantity Analysis report prepared by Complete Laboratory Solutions which concluded that the condition of the water supply to be of “good condition” on 29/01/2024. On this basis I am satisfied that no public health concerns arise and should permission be granted I recommend a standard condition in relation to water supply.

7.8. Other Matters

- 7.8.1. In relation to precedent, I note the appellant is concerned that a precedent will be set for additional pods into the future and the dynamic will be changed to a large commercial venture like a caravan park. I note that I have considered the proposed development on its merits and I do not consider that a grant of permission would automatically require further grants of permission for expansion on the site to cater for tourist accommodation given that each application would be assessed on its merits and that compliance with the Development Plan is required in all instances. I therefore do not consider the development to be akin to a large commercial venture like a caravan park. Rather it is modest in size and seeks to have a low impact on adjacent ground via the use of low impact glamping pods.
- 7.8.2. In relation to construction impacts, should permission be granted I recommend that a Construction Waste Environmental Plan be required to be submitted for agreement with the P.A. in accordance with best practice. This is of particular importance given the issues noted above and below in relation to wastewater treatment and in relation to potential impacts on water quality and on sensitive designated sites in the vicinity.
- 7.8.3. In relation to applicable environmental impacts, these have been assessed above and below and I note the Development Plan makes no reference to Machair sites and that there is no planning or environmental policy on same.
- 7.8.4. Given the modest scale of development and the above assessment, I do not consider that over-tourism is a significant issue for the area.

8.0 EIA Screening

- 8.1. The proposed development has been subject to preliminary examination for environmental impact assessment (refer to Form 1 and Form 2 in Appendices of this report). Having regard to the characteristics and location of the proposed development and the types and characteristics of potential impacts, it is considered that there is no real likelihood of significant effects on the environment. The proposed development, therefore, does not trigger a requirement for environmental impact assessment screening and an EIAR is not required.

9.0 Appropriate Assessment (AA) Screening

- 9.1. I have considered the proposed development in light of the requirements of S177U of the Planning and Development Act 2000 as amended. See Appendix 3 AA Screening Determination. The subject site is located c.0.16km north of Mweelrea/Sheeffry/Effiff Complex Special Area of Conservation (SAC) (site code 001932) and c.1.2km north-east of West Connacht Coast SAC (site code 002998).
- 9.2. The proposed development comprises 6 glamping pods, new machinery shed, barn conversion and extension and shed conversion including provision of accommodation unit, reception, common room, kitchen/dining facilities, shower room and games room, and new internal access road and car park, new private wastewater treatment system and water from private well.
- 9.3. Having considered the nature, scale and location of the project, I conclude, on the basis of objective information, and noting the precautionary principle, that it is not possible to exclude that the proposed development alone will give rise to significant effects on Mweelrea/Sheeffry/Effiff Complex Special Area of Conservation (SAC) (site code 001932) and on West Connacht Coast SAC (site code 002998) European Sites in view of the conservation objectives for these sites. Appropriate Assessment is required.
- 9.4. The reason for this conclusion is as follows:
- The failure to demonstrate that the wastewater treatment system is in compliance with EPA standards for the treatment and safe disposal of foul water and the consequent threat to groundwater and surface water in the vicinity.
 - The failure of the submitted AA Screening Report to note and consider the potential hydrological pathway through the site to the European sites.
 - The direct link to the European sites via the watercourse through the site.
- 9.5. Noting the above conclusion this would be contrary to policy NEP 1 to protect Natura 2000 sites and I recommend that permission be refused in relation to this issue.

10.0 Water Framework Directive

- 10.1. I note designated waterbodies must be improved to at least good ecological status per the requirements of the Water Framework Directive. I have carried out a screening assessment in Appendix 4 in relation to impacts related to the requirements of the Water Framework Directive. Noting that the applicant has failed to demonstrate that the proposed on site wastewater treatment system and soil polishing filter complies with the EPA Code, I have concluded that it cannot be ruled out that the proposed development will not pose a risk to surface and ground water bodies.
- 10.2. Given the proximity of the adjacent stream, the proposed development may prevent the future attainment of a 'Good' water status and may result in the deterioration of existing water quality of the Lackakeely surface waterbody and the Clifden Castlebar ground waterbody which would not be consistent with the Water Framework Directive. Accordingly, I recommend that permission be refused in relation to this issue.

11.0 Recommendation

I recommend that permission be refused.

12.0 Reasons and Considerations

1. Having regard to the observed ground conditions on the site where poorly draining water has been observed indicative of a high water level and the absence of required section drawings demonstrating that the percolation area can be sited in the indicative position shown to achieve necessary separation distances, the Commission is not satisfied that the wastewater from the proposed development can be disposed of in accordance with provisions of the EPA Code of Practice 2021: "Domestic Waste Water Treatment Systems (Population Equivalent ≤ 10)" as required by Section 2.10 of Volume 2 of the Mayo County Development Plan 2022-2028. Noting this and the adjacent hydrological connection and the proximity to the Mweelrea/Sheeffry/Effiff Complex Special Area of Conservation (SAC)

(site code 001932), Mweelrea/Sheeffry/Effiff Complex Proposed Natural Heritage Area (PNHA) (site code 001932) and the West Connacht Coast SAC (site code 002998), it cannot be concluded that there would be no significant adverse impact on the integrity of these protected Natura 2000 sites and designated site and this is contrary to policy NEP 1 of the Development Plan. There has been failure to demonstrate that there would be no adverse impact on ground or surface waters such that the proposed development may prevent the future attainment of a 'Good' water status and may result in the deterioration of existing water quality of the Lackakeely waterbody which would not be consistent with the Water Framework Directive. The proposed development if permitted would therefore be prejudicial to public health and the uncertainty that arises in relation to impacts on water quality and to European and designated sites precludes the Board from granting permission for the proposed development.

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.

Ciarán Daly

Planning Inspector

23rd July 2025

Appendix 1

Form 1 - EIA Pre-Screening

Case Reference	ABP-322425-25
Proposed Development Summary	6 glamping pods, new machinery shed, conversion of barn into reception, common room, kitchen/dinning. Renovate existing building to shower room, games room. On-site effluent treatment systems and all associated site works.
Development Address	Dadreen, Killadoon, Louisburgh, Co. Mayo.
	In all cases check box /or leave blank
1. Does the proposed development come within the definition of a 'project' for the purposes of EIA? (For the purposes of the Directive, "Project" means: - The execution of construction works or of other installations or schemes, - Other interventions in the natural surroundings and landscape including those involving the extraction of mineral resources)	<input checked="" type="checkbox"/> Yes, it is a 'Project'. Proceed to Q2. <input type="checkbox"/> No, No further action required.
2. Is the proposed development of a CLASS specified in Part 1, Schedule 5 of the Planning and Development Regulations 2001 (as amended)?	
<input type="checkbox"/> Yes, it is a Class specified in Part 1. EIA is mandatory. No Screening required. EIAR to be requested. Discuss with ADP.	
<input checked="" type="checkbox"/> No, it is not a Class specified in Part 1. Proceed to Q3	
3. Is the proposed development of a CLASS specified in Part 2, Schedule 5, Planning and Development Regulations 2001 (as amended) OR a prescribed type of proposed road development under Article 8 of Roads Regulations 1994, AND does it meet/exceed the thresholds?	

<input type="checkbox"/> No, the development is not of a Class Specified in Part 2, Schedule 5 or a prescribed type of proposed road development under Article 8 of the Roads Regulations, 1994. No Screening required.	
<input type="checkbox"/> Yes, the proposed development is of a Class and meets/exceeds the threshold. EIA is Mandatory. No Screening Required	State the Class and state the relevant threshold
<input checked="" type="checkbox"/> Yes, the proposed development is of a Class but is sub-threshold. Preliminary examination required. (Form 2) OR If Schedule 7A information submitted proceed to Q4. (Form 3 Required)	State the Class and state the relevant threshold Part 2, Class 12(c) and (d). Threshold: Holiday villages which would consist of more than 100 holiday homes outside built-up areas; hotel complexes outside built-up areas which would have an area of 20 hectares or more or an accommodation capacity exceeding 300 bedrooms. and/or Permanent camp sites and caravan sites where the number of pitches would be greater than 100.
4. Has Schedule 7A information been submitted AND is the development a Class of Development for the purposes of the EIA Directive (as identified in Q3)?	
Yes <input type="checkbox"/>	Screening Determination required (Complete Form 3)
No <input checked="" type="checkbox"/>	Pre-screening determination conclusion remains as above (Q1 to Q3)

Inspector: _____ Date: _____

Appendix 2

Form 2 - EIA Preliminary Examination

Case Reference	ABP-322425-25
Proposed Development Summary	6 glamping pods, new machinery shed, conversion of barn into reception, common room, kitchen/dinning. Renovate existing building to shower room, games room. On-site effluent treatment systems and all associated site works.
Development Address	Dadreen, Killadoon, Louisburgh, Co. Mayo.
This preliminary examination should be read with, and in the light of, the rest of the Inspector's Report attached herewith.	
Characteristics of proposed development (In particular, the size, design, cumulation with existing/ proposed development, nature of demolition works, use of natural resources, production of waste, pollution and nuisance, risk of accidents/disasters and to human health).	Briefly comment on the key characteristics of the development, having regard to the criteria listed. 6 no. new glamping pods, new machinery shed, barn conversion and extension and shed conversion, including provision of accommodation unit, reception, common room, kitchen/dining facilities, shower room and games room, and new internal access road and car park, new private wastewater treatment system and water from private well. Site Area 1.272ha Total floor area 656sqm and modest scale of proposed buildings noted.
Location of development (The environmental sensitivity of geographical areas likely to be affected by the development in particular existing and approved land use, abundance/capacity of natural resources, absorption capacity of natural environment e.g. wetland, coastal zones, nature reserves, European sites, densely populated areas, landscapes, sites of historic, cultural or archaeological significance).	Briefly comment on the location of the development, having regard to the criteria listed The site is located partially within the Mweelrea/Sheeffry/Erriff Complex PNHA (site code 001932). A watercourse runs through the site which leads to European sites. No significant loss of hedgerow / trees is proposed in the context of the EIA threshold.

Types and characteristics of potential impacts (Likely significant effects on environmental parameters, magnitude and spatial extent, nature of impact, transboundary, intensity and complexity, duration, cumulative effects and opportunities for mitigation).	Having regard to the characteristics of the development and the sensitivity of its location, consider the potential for SIGNIFICANT effects, not just effects. Nature of the development with no significant pollution at construction or operational stages, wastewater treatment not demonstrated to be EPA Code compliant and its proximity to sensitive receptors, but modest scale relative to EIA threshold, such that no likely significant effects on the environment arise.
Conclusion	
Likelihood of Significant Effects	Conclusion in respect of EIA
There is no real likelihood of significant effects on the environment.	EIA is not required.

Inspector: _____ **Date:** _____

DP/ADP: _____ **Date:** _____

(only where Schedule 7A information or EIAR required)

Appendix 3

Appropriate Assessment Screening

Screening for Appropriate Assessment Test for likely significant effects	
Step 1: Description of the project and local site characteristics	
Brief description of project	6 glamping pods, new machinery shed, conversion of barn into reception, common room, kitchen/dinning. Renovate existing building to shower room, games room. On-site effluent treatment systems and all associated site works.
Brief description of development site characteristics and potential impact mechanisms	<p>Site Area 1.272ha Total floor area 656sqm.</p> <p>An on-site wastewater treatment system is proposed and it has not been demonstrated that it accords with EPA Code such that untreated wastewater may escape to groundwater.</p> <p>There is a stream running through the site which flows to the Mweelrea/Sheeffry/Effiff Complex SAC and which leads to the West Connacht Coast SAC further out to sea.</p>
Screening report	Y – ‘Appropriate Assessment of Protected Sites Screening Report’ prepared by Sitecheck Environmental Scientist Siobhán Sheil.
Natura Impact Statement	N
Relevant submissions	Issues raised in relation to potential adverse impact of the on-site wastewater treatment system.
<p>The submitted AA Screening Report assumes that wastewater will be adequately controlled by the on-site system which is part of the design of the proposed development. However, the adequacy of this system has not been demonstrated to accord with the EPA Code of Practice. The submitted report notes that there are no watercourses directly associated with the proposed development site which is not correct as there is a stream flowing through the site which leads to the Mweelrea/Sheeffry/Effiff Complex SAC.</p>	

Step 2. Identification of relevant European sites using the Source-pathway-receptor model

European Site (code)	Qualifying interests ¹ Link to conservation objectives (NPWS, date)	Distance from proposed development (km)	Ecological connections ²	Consider further in screening ³ Y/N
Mweelrea/Sheeffry/Effiff Complex Special Area of Conservation (SAC) (site code 001932)	Conservation Objectives dated 23 rd October 2017	c.0.16km	Direct connection via watercourse on and adjacent to site at lower levels.	Y
West Connacht Coast SAC (site code 002998).	Conservation Objectives dated 17 th January 2025	c.1.2km	Direct connection via watercourse on and adjacent to site at lower levels.	Y

¹ Summary description / **cross reference to NPWS website** is acceptable at this stage in the report

² Based on source-pathway-receptor: Direct/ indirect/ tentative/ none, via surface water/ ground water/ air/ use of habitats by mobile species

³if no connections: N

Step 3. Describe the likely effects of the project (if any, alone or in combination) on European Sites

AA Screening matrix

Site name Qualifying interests	Possibility of significant effects (alone) in view of the conservation objectives of the site*	
	Impacts	Effects
Site 1: Mweelrea/Sheeffry/Effiff Complex Special Area of Conservation (SAC) (site code 001932) <u>Qualifying Interests</u> Coastal lagoons [1150]	Direct: Negative impacts (temporary) on surface water/water quality due to construction related emissions including increased sedimentation and construction related pollution. Potential impacts via groundwater pollution and onward to surface water from the	Potential negative affect on conservation objectives related to water quality.

<p>Annual vegetation of drift lines [1210]</p> <p>Atlantic salt meadows (Glauco-Puccinellietalia maritima) [1330]</p> <p>Mediterranean salt meadows (Juncetalia maritimi) [1410]</p> <p>Embryonic shifting dunes [2110]</p> <p>Shifting dunes along the shoreline with <i>Ammophila arenaria</i> (white dunes) [2120]</p> <p>Fixed coastal dunes with herbaceous vegetation (grey dunes) [2130]</p> <p>Atlantic decalcified fixed dunes (<i>Calluno-Ulicetea</i>) [2150]</p> <p>Dunes with <i>Salix repens</i> ssp. <i>argentea</i> (<i>Salicion arenariae</i>) [2170]</p> <p>Humid dune slacks [2190]</p> <p>Machairs (* in Ireland) [21A0]</p> <p>Oligotrophic waters containing very few minerals of sandy plains (<i>Littorelletalia uniflorae</i>) [3110]</p> <p>Oligotrophic to mesotrophic standing waters with vegetation of the <i>Littorelletea uniflorae</i> and/or <i>Isoeto-Nanojuncetea</i> [3130]</p> <p>Natural dystrophic lakes and ponds [3160]</p> <p>Water courses of plain to montane levels with the <i>Ranunculion fluitantis</i> and</p>	<p>on-site wastewater treatment system due to close proximity of stream which flows to this SAC.</p> <p>Indirect: N/A</p>	
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<p>Callitricho-Batrachion vegetation [3260]</p> <p>Northern Atlantic wet heaths with <i>Erica tetralix</i> [4010]</p> <p>European dry heaths [4030]</p> <p>Alpine and Boreal heaths [4060]</p> <p><i>Juniperus communis</i> formations on heaths or calcareous grasslands [5130]</p> <p>Hydrophilous tall herb fringe communities of plains and of the montane to alpine levels [6430]</p> <p>Blanket bogs (* if active bog) [7130]</p> <p>Transition mires and quaking bogs [7140]</p> <p>Depressions on peat substrates of the Rhynchosporion [7150]</p> <p>Petrifying springs with tufa formation (Cratoneurion) [7220]</p> <p>Alkaline fens [7230]</p> <p>Siliceous scree of the montane to snow levels (<i>Androsacetalia alpinae</i> and <i>Galeopsietalia ladani</i>) [8110]</p> <p>Calcareous rocky slopes with chasmophytic vegetation [8210]</p> <p>Siliceous rocky slopes with chasmophytic vegetation [8220]</p>		
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<p>Vertigo geyeri (Geyer's Whorl Snail) [1013]</p> <p>Vertigo angustior (Narrow-mouthed Whorl Snail) [1014]</p> <p>Margaritifera margaritifera (Freshwater Pearl Mussel) [1029]</p> <p>Salmo salar (Salmon) [1106]</p> <p>Lutra lutra (Otter) [1355]</p> <p>Petalophyllum ralfsii (Petalwort) [1395]</p> <p>Najas flexilis (Slender Naiad) [1833]</p>		
	Likelihood of significant effects from proposed development (alone): Yes	
	If No, is there likelihood of significant effects occurring in combination with other plans or projects?	
	Impacts	Effects
<p>Site 2: West Connacht Coast SAC (site code 002998).</p> <p><u>Qualifying Interests</u></p> <p>Tursiops truncatus (Common Bottlenose Dolphin) [1349]</p> <p>Phocoena phocoena (Harbour Porpoise) [1351]</p>	<p>Direct:</p> <p>Negative impacts (temporary) on surface water/water quality due to construction related emissions including increased sedimentation and construction related pollution.</p> <p>Potential impacts via groundwater pollution and onward to surface water from the on-site wastewater treatment system due to close proximity of stream which flows to this SAC.</p> <p>Indirect:</p> <p>N/A.</p>	<p>Potential negative affect on conservation objectives related to water quality.</p>
	Likelihood of significant effects from proposed development (alone): Yes	

	If No, is there likelihood of significant effects occurring in combination with other plans or projects?
<p>* Where a restore objective applies it is necessary to consider whether the project might compromise the objective of restoration or make restoration more difficult.</p>	
<p>Step 4 Conclude if the proposed development could result in likely significant effects on a European site</p>	
<p>It is not possible to exclude the possibility that proposed development alone would result significant effects on Mweelrea/Sheeffry/Effiff Complex Special Area of Conservation (SAC) (site code 001932) and on West Connacht Coast SAC (site code 002998). An appropriate assessment is required on the basis of the possible effects of the project 'alone'. Further assessment in-combination with other plans and projects is not required at screening stage.</p>	

Screening Determination

Significant effects cannot be excluded

In accordance with Section 177U of the Planning and Development Act 2000 (as amended) and on the basis of the information considered in this AA screening, I conclude that it is not possible to exclude that the proposed development alone will give rise to significant effects on Mweelrea/Sheeffry/Effiff Complex Special Area of Conservation (SAC) (site code 001932) and on West Connacht Coast SAC (site code 002998) European Sites in view of the conservation objectives for these sites. Appropriate Assessment is required.

This determination is based on:

- The failure to demonstrate that the wastewater treatment system is in compliance with EPA standards for the treatment and safe disposal of foul water and the consequent threat to groundwater and surface water in the vicinity.
- The failure of the submitted AA Screening Report to note and consider the potential hydrological pathway through the site to the European sites.
- The direct link to the European sites via the watercourse through the site.

Appendix 4

Water Framework Directive Screening and Assessment

WFD IMPACT ASSESSMENT STAGE 1: SCREENING			
<p>Step 1: The proposed development is for tourism accommodation including 6 glamping pods, new machinery shed, and converted barns for services and accommodation purposes and on site wastewater treatment system.</p> <p>Site Area 1.272ha</p> <p>Total floor area 656sqm.</p> <p>An on-site wastewater treatment system is proposed and it has not been demonstrated that it accords with EPA Code such that untreated wastewater may escape to groundwater.</p> <p>There is a stream running through part of the site and adjacent to it, the Lackakeely_010 waterbody and the subject site is located within the catchment of this waterbody.</p>			
An Bord Pleanála ref. no.	ABP-322425-25	Townland, address	Dadreen, Killadoon, Louisburgh, Co. Mayo.
Description of project		The proposed development consists of 6 glamping pods, new machinery shed, conversion of barn into reception, common room, kitchen/dinning. Renovate	

	existing building to shower room, games room. On-site effluent treatment systems and all associated site works.
Brief site description, relevant to WFD Screening,	<p>The site is undulating and slopes uphill from west to east with the Clifden Castlebar groundwater body underneath the site and the Lackakeely_010 waterbody passing through and close to the higher part of the site and the stream then runs adjacent/south of the site and downhill of it before it continues flowing to the south-west. The site is surrounded by undulating grassland and by a dwelling to the north-west.</p> <p>Three of the glamping pods would be located in relatively close proximity to the waterbody.</p> <p>The water supply for the development is stated to be from a well but this is not marked on the submitted maps.</p> <p>The Site Characterisation Report noted that bedrock was encountered at 1.6m depth. The proposed wastewater treatment system is to be located at a level on the site lower than the buildings and glamping pods although there is limited detail on this with no section drawings submitted to show the invert level and noting that this area of the site is on slope.</p>

Proposed surface water details			Soakpit proposed on main site and permeable paving on separate overflow car park site.			
Proposed water supply source & available capacity			Well but location not shown on Proposed Site Layout Plan.			
Proposed wastewater treatment system & available capacity, other issues			The applicant has failed to demonstrate that the wastewater treatment system and soil polishing filter would comply with the EPA Code.			
Others?						
Step 2: Identification of relevant water bodies and Step 3: S-P-R connection						
Identified water body	Distance to (m)	Water body name(s) (code)	WFD Status	Risk of not achieving WFD Objective e.g.at risk, review, not at risk	Identified pressures on that water body	Pathway linkage to water feature (e.g. surface run-off, drainage, groundwater)

River Waterbody	0m, passes through part of the site.	Lackakeely_0 10 (Code IE_WE_32L1 20720)	High	Under review.	No pressures.	Surface run-off and groundwater. Hydrologically connected to watercourse.
Groundwater Waterbody	Underlying site	Clifden Castlebar (IE_WE_G_0 017)	Good	Not at risk.	No pressures.	Surface run-off to groundwater.

Step 4: Detailed description of any component of the development or activity that may cause a risk of not achieving the WFD Objectives having regard to the S-P-R linkage.

CONSTRUCTION PHASE							
No.	Component	Waterbody receptor (EPA Code)	Pathway (existing and new)	Potential for impact/ what is the possible impact	Screening Stage Mitigation Measure*	Residual Risk (yes/no) Detail	Determination** to proceed to Stage 2. Is there a risk to the water environment? (if 'screened' in or 'uncertain' proceed to Stage 2.
1.	Surface	Lackakeely_010 (Code IE_WE_32 L120720)	Via land sloping towards watercourse on site and where adjacent to site.	Siltation, pH (Concrete), hydrocarbon spillages	Standard construction practice CEMP	No	Screened out
2.	Ground	Clifden Castlebar (IE_WE_G_0017)	Pathway exists	Spillages.	As above	No	Screened out

OPERATIONAL PHASE							
3.	Surface	Lackakeely _010 (Code IE_WE_32 L120720)	Via land sloping towards watercourse on site and where adjacent to site.	Transmission from inadequately wastewater (not demonstrated to EPA Code) via groundwater to adjacent watercourse	Soakpit for surface water run- off. Inadequat e measures in relation to WWTP which could lead to transmissi on to adjacent watercour se.	No	Screened in
4.	Ground	Clifden Castlebar	Pathway exists	Spillages and on-site	None	Yes	Screened in

		(IE_WE_G_0017)		wastewater treatment system not demonstrated to be in compliance with EPA Code			
DECOMMISSIONING PHASE							
5.	NA						
STAGE 2: ASSESSMENT							
Details of Mitigation Required to Comply with WFD Objectives							
Groundwater							
Development/Activity e.g. abstraction, outfall, etc.	<u>Objective 1: Groundwater</u> Prevent or limit the input of pollutants		<u>Objective 2 : Groundwater</u> Protect, enhance and restore all		<u>Objective 3:Groundwater</u> Reverse any significant and sustained upward trend in the concentration of		Does this component comply with WFD Objectives

	into groundwater and to prevent the deterioration of the status of all bodies of groundwater	bodies of groundwater, ensure a balance between abstraction and recharge, with the aim of achieving good status*	any pollutant resulting from the impact of human activity	1, 2, 3 & 4? (if answer is no, a development cannot proceed without a derogation under art. 4.7)
	Describe mitigation required to meet objective 1:	Describe mitigation required to meet objective 2:	Describe mitigation required to meet objective 3:	
Development Activity 3: Operation phase, surface water	Required to demonstrate WWTP and soil polishing filter to comply with EPA Code as potential transmission via	Required to demonstrate WWTP and soil polishing filter to comply with EPA Code.	WWTP to EPA Code.	No - applicant has failed to demonstrate compliance.

	groundwater to adjacent watercourse			
Development Activity 4: Operation phase, groundwater	Required to demonstrate WWTP and soil polishing filter to comply with EPA Code	Required to demonstrate WWTP and soil polishing filter to comply with EPA Code.	WWTP to EPA Code.	No - applicant has failed to demonstrate compliance.

Noting that the applicant has failed to demonstrate that the proposed on-site wastewater treatment system and soil polishing filter complies with the EPA Code, I have concluded that it cannot be ruled out that the proposed development will not pose a risk to ground water or surface water bodies in the vicinity.

Given the proximity of the adjacent stream, the proposed development may prevent the future attainment of a 'Good' water status and may result in the deterioration of existing water quality of the Clifden Castlebar groundwater body and the Lackakeely surface waterbody which would not be consistent with the Water Framework Directive.