



An  
Coimisiún  
Pleanála

## Inspector's Report

**PL-500964-SO-26**

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<b>Development</b>	The construction of storage unit and associated site works.
<b>Location</b>	Carrowbunnaun, Strandhill, County Sligo.
<b>Planning Authority</b>	Sligo County Council
<b>Planning Authority Reg. Ref.</b>	2660001
<b>Applicant</b>	David Kiely
<b>Type of Application</b>	Permission.
<b>Planning Authority Decision</b>	Permission with conditions.
<b>Type of Appeal</b>	Third Party
<b>Appellant</b>	Adrian Kenny

**Observers**

None

**Date of Site Inspection**

24<sup>th</sup> April 2026.

**Inspector**

Derek Daly

## 1.0 Site Location and Description

- 1.1. The site is located in the townland of Carrowbunnaun, and is located within Strandhill Golf Club in County Sligo. The appeal site is adjacent to the greenkeeper's workshop and hardstand/compound and between two fairways on the golf course. The site is relatively screened and cut into landscape and not readily visible and does not break the skyline.
- 1.2. The proposed site which is to north of the existing working is proposed to be constructed on a hard standing area.
- 1.3. The site to which the development relates has a stated area of 0.008 hectares.

## 2.0 Proposed Development

- 2.1. The proposed development as received by the planning authority on the 5<sup>th</sup> December 2025 was for;
  - The construction of a storage unit with an approximate floor area of 50m<sup>2</sup> which is located adjacent to an existing greenkeepers workshop, together with all ancillary works.
  - The shed is a framed structure 10105mm by 5150mm externally with a pitch roof and an external cladding with an overall height to the pitch of 3736mm.

A cover letter submitted with the application indicated that the Health and Safety Authority raised one issue of concern related to available space and designated walkways within the existing Greenkeeper's Shed. While work has taken place to rationalise arrangements of plant, materials, seeds and fertilizers within the shed, there is still not enough space to accommodate all plant safely or to allow for its safe removal from the building for use and safer return after use. Accordingly, a new small shed of 50m<sup>2</sup> is proposed which will be located on an existing concrete slab located immediately adjacent to (and to the north of) the existing shed. The new shed will be used for some of the larger items of machinery and plant associated with golf course maintenance. With the exception of an electrical supply, the building will not be connected to any services. Surface water will percolate into the adjacent

ground. The building will be accessed directly from the edge of the 18th fairway, with no additional hard standing proposed.

### **3.0 Planning Authority Decision**

#### **3.1. Decision**

The decision of the Planning Authority was to grant planning permission subject to two conditions one of which was a contribution condition.

#### **3.2. Planning Authority Reports**

The planning report dated the 10<sup>th</sup> February 2026 refers to the planning history, development plan provisions, submissions received and an assessment of the development.

In relation to the principle of development, it was considered that the shed is associated with the Golf Course, and a Golf Course is normally permitted within an open space zoning in accordance with section 10.5.4 of the CDP, Land-use Zoning Matrix and there was no objection in principle to the proposed development. It was considered that the proposed development can be accommodated on site without having an adverse impact on the visual amenities of the area, there are no residential amenity implications or in relation to traffic safety.

Permission was recommended.

#### **3.3. Other submissions**

3.4. The report of the Area Engineer dated 30<sup>th</sup> January 2026 recommended permission.

3.5. A third party submission / observation was submitted on the 9<sup>th</sup> February 2026 which contended that the application is fundamentally flawed, procedurally invalid, and lacks the necessary scientific certainty required to protect the adjacent Cummeen Strand/Drumcliff Bay SAC, considers that the proposal represents a clear instance of "project-splitting" which has the effect of circumventing a full Appropriate Assessment (AA.) and technical inadequacies and material omissions in the AA Screening Report.

## 4.0 Planning History

### 4.1. P.A. Ref. No. PL22/160.

Permission granted for modifications to course, internal road and carparking, including grassing over existing carpark to front of clubhouse, construction of new practice area and bunker, modifications to 10th and 12th greens and 11th tee, realignment of private road and creation of replacement parking spaces to the side and rear of the clubhouse, together with all ancillary works.

### 4.2. P.A. Ref. No.PL05/865.

### 4.3. Permission granted for the demolition of damaged buildings and construction of 2 storey extension to the clubhouse, comprising lounge, professional shop, toilet and ancillary accommodation together with associated car park, site works and services.

## 5.0 Policy and Context

### 5.1. Development Plan

The statutory development plan is the Sligo County Development Plan and the Strandhill Village Plan 2024 – 2030. The Settlement Strategy designates Strandhill a Satellite Village of Sligo Regional Growth Centre (RGC).

Chapter 10. Refers to Urban development principles and section 10.5.3 to Land-use zoning objectives. Among the zonings are Zoning OS – open space (public, private, natural, semi-natural, sports fields, green corridors) The objectives of the OS zoning include;

a. Ensure adequate provision and maintenance of public open space, to be developed and used for parks and playgrounds. Green areas associated with housing development become public open spaces only after they are taken in charge by the Local Authority.

c. Require the protection and enhancement of natural/semi-natural green areas such as wetlands, forests, water-edge habitats, riparian zones and ensure that any development that may be permitted in such areas does not damage its surroundings.

d. Support the development of playing fields, tennis courts, golf courses, bowling

greens etc at appropriate locations. These facilities can be provided either by the County Council or by other organisations such as sports clubs and associations.

A Golf Course is normally permitted within an OS zoning in accordance with section 10.5.4 of the CDP, Land-use Zoning Matrix.

5.2. Volume 2 Chapter 19 of the plan refers to the Strandhill Village Plan. The plan also provides for a zoning map and objectives map. The appeal site is located within an area zoned OS – open space and recreational amenities. There is no specific objective indicated in relation to the appeal site on the objectives map.

5.3. Chapter 24. Refers to Natural heritage and in relation to designated sites for nature conservation policies include;

P-DSNC-1 Protect and maintain the conservation status of all natural heritage sites designated or proposed for designation in accordance with European and national legislation and agreements. These include Special Areas of Conservation (SAC), Special Protection Areas (SPA), Natural Heritage Areas (NHA), proposed Natural Heritage Areas (pNHA), Ramsar Sites, Statutory Nature Reserves, as identified by the Minister for Culture, Heritage and the Gaeltacht, and any other sites that may be proposed for designation during the lifetime of this Plan. In addition, the Council will identify, maintain and develop non-designated areas of high nature conservation value which serve as linkages or ‘stepping stones’ between protected sites in accordance with Article 10 of the Habitats Directive.

P-DSNC-2 Promote the maintenance and, as appropriate, achievement of ‘favourable conservation status’ of habitats and species in association with the National Parks and Wildlife Service (NPWS).

P-DSNC-3 Carry out an appropriate level of assessment for all development plans, land-use plans and projects that the Council authorizes or proposes to undertake or adopt, to determine the potential for these plans or projects to impact on designated sites, proposed designated sites or associated ecological corridors and linkages in accordance with the Habitats Directive. All appropriate assessments shall be in compliance with the provisions of Part XAB of the Planning and Development Act 2000 (as amended).

P-DSNC-4 Ensure that all development proposals are subject to the process of Screening for Appropriate Assessment and subsequent stages of Appropriate Assessment, as relevant, carried out to the satisfaction of the Planning Authority, in consultation with National Parks and Wildlife Service, as appropriate.

Stated objectives are;

O-DSNC-1 Identify any areas of high nature conservation value which are of major importance for wild fauna and flora in accordance with Article 10 of the Habitats Directive, and which have not been previously identified.

O-DSNC-2 Undertake appropriate surveys and collect data to provide an evidence-base to assist the Council in meeting its obligations under Article 6 of the Habitats Directives (92/43/EEC) as transposed into Irish Law, subject to available resources.

#### 5.4. **Natural Heritage Designations**

The subject site of the proposed development is in close proximity to a number of Natura 2000 sites.

Ballysadare Bay SAC site code 000622 is a Special Area of Conservation (SAC) selected for the following habitats and/or species listed on Annex I / II of the E.U. Habitats Directive which include Estuaries; Tidal Mudflats and Sandflats; Embryonic Shifting Dunes, Marram Dunes (White Dunes); Fixed Dunes (Grey Dunes); Humid Dune Slacks; Narrow-mouthed Whorl Snail (*Vertigo angustior*) and Common (Harbour) Seal (*Phoca vitulina*). Ballysadare Bay contains extensive intertidal sand and mudflats, approximately 1,500 ha in extent overall. There is a large sand dune system at Strandhill which has been relatively undisturbed by grazers. The dune system is highly dynamic and the largest proportion of the dune system is made up of fixed dunes, a priority habitat listed on Annex I of the E.U. Habitats Directive. The rarity of intact dune systems is recognised in the listing of fixed dunes as a priority habitat on Annex I of the E.U. Habitats Directive.

Part of the golf course is located within the SAC however the area in which the storage unit is proposed is not within the SAC.

The Ballysadare Bay SAC overlaps with Ballysadare Bay SPA (004129) and the following habitats and/or species listed on Annex I / II of the E.U. Habitats Directive which include light-bellied Brent Goose (*Branta bernicla hrota*); grey Plover (*Pluvialis*

squatarola); dunlin (*Calidris alpina*); bar-tailed godwit (*Limosa lapponica*); redshank (*Tringa totanus*) and wetland and waterbirds. Ballysadare Bay SPA is of high ornithological importance. The presence of Bar-tailed Godwit, Golden Plover and Whooper Swan is of particular note as these species are listed on Annex I of the E.U. Birds Directive. The site forms an important component of the larger Sligo Bay complex.

The Ballysadare Bay SAC also adjoins Unshin River SAC (001898) a river system which runs from Lough Arrow north to Ballysadare Bay with qualifying habitats associated with the river.

Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC 000627 is located to the north of Ballysadare Bay SAC incorporating Sligo Harbour and Drumcliffe Bay and also largely incorporates areas of Cummeen Strand SPA 004035 and Drumcliff Bay SPA 004013.

In relation to pNHAs, the most proximate are pNHA Ballysadare Bay site code 000622; pNHA Cummeen Strand/Drumcliff Bay (Sligo Bay) 000627 and pNHA: 001670 Knocknarea Mountain And Glen.

The site to which the development which is the subject of this appeal is not within a Natura site. Part of the golf course in close proximity to the coastline is within the Ballysadare Bay SAC the Ballysadare Bay SPA and Ballysadare Bay pNHA.

## **6.0 EIA Screening**

- 6.1. The proposed development is not a class to which Schedule 5 of the Planning and Development Regulations, 2001, as amended, applies and therefore, the requirement for submission of an EIAR and carrying out of an EIA may be set aside. Refer to Appendix 1 - Form 1

## **7.0 The Appeal**

### **7.1. Grounds of Appeal**

The appellant grounds of appeal in summary refers to;

- The current development cannot be viewed in isolation and reference is made to a series of incremental works as part of a publicly advertised course redevelopment and constitutes impermissible project splitting.
- This occurs by breaking into smaller phases bypasses the mandatory threshold for EIA and the phases are functionally interdependent and should be assessed as one single project under the EIA Directive.
- Reference is made to other works carried out as part of a single long term masterplan for the golf course.
- Reference is made to the impact on Ballysadare Bay SAC and that the development is contiguous to this site and cumulative impacts must be assessed.
- Reference is made to unauthorised development and unauthorised excavation of dunes and that permission cannot be granted where the environmental assessment was bypassed via unauthorised development.
- The scale of works relating to the sand dunes far exceeds maintenance and constitutes development and a material change of use of the sand dune system into engineered sports surfaces.
- Reference is made to coastal protection works and that fairways on the course are dependent on these works.
- The precautionary principle in relation to the Ballysadare Bay SAC should apply referencing project splitting and cumulative impact.
- The Planning Authority AA Screening is flawed in not taking into account the total land area affected by the golf club since 2015.
- Reference is made to change of use and the golf course extending into natural habitat and also to the definition of works and material change of use.
- Reference is made to court judgements in relation to interconnected projects, project splitting and the necessity of assessing cumulative masterplans.
- Dune excavation is not maintenance.

- In the event of permission being granted conditions in relation to the requirement of 10 year masterplan, remedial NIS for all works carried out since 2015, a requirement for ecological monitoring, a condition on the cessation of use on the 4<sup>th</sup> and 5<sup>th</sup> holes until cumulative environmental mitigation measures are completed and a condition for a bond in relation to reinstatement and also for a section 47 agreement in relation to an area specified.
- The submission includes 23 appendices which include photographs, reference to the club history and developments carried out including remodelling of holes and bunkers on the course including interaction with the SAC, EPA mapping, details relating to planning enforcement history submission made by the applicant in relation to the draft Sligo CDP and a copy of the Local Biodiversity Action Plan for Strandhill.

## 7.2. Planning Authority Response

The planning authority dated the 7<sup>th</sup> April 2026 in a response in relation to the appeal submission in summary indicate;

- The proposed development is minor in nature involving the construction of a storage unit (50 sq. metres. Approx.), adjacent to existing greenkeepers workshop, together with all ancillary works.
- The proposed development does not include any sanitary facilities and will be used solely for storage purposes.
- The subject application included a screening report prepared by JKW Environment. The report identified that the subject site is not located within any Natura 2000 sites and concludes that, "The works area is entirely hard-surfaced and intensively managed and does not support, nor is it adjacent to, suitable habitat for Annex I habitats or Annex II species, including narrow mouthed whorl snail. The site does not function as supporting habitat for mobile qualifying species associated with nearby European sites, and the nature, scale and location of the proposed development are such that disturbance effects can be objectively excluded. A Stage 2 Appropriate Assessment is therefore not required, and the competent authority is provided

with sufficient information to make a determination in compliance with Article 6(3) of the Habitats Directive”.

- The Planning Authority concurs with conclusion of the screening report and considers that the proposed development would not have a significant effect individually, or in-combination with other plans and projects, on the Natura 2000 network.
- Unauthorised Development & Warning Letters. A Warning Letter 06.11.25 Sligo County Council - Enforcement Complaint 763306277 - was issued in November 2025 regarding unauthorized excavation of the dunes (Greens 4 & 5), and the applicant has previously admitted to works within the SAC in 2023 at this course location.
- The recent works carried out on the golf course were located outside of the Natura 2000 network and were deemed to constitute exempted development in accordance with Class 34, Schedule 2, Part 1, Exempted Development General of the Planning & Development Regulations 2001(as amended).

### 7.3. **First Party response**

The applicant in a response to the grounds of appeal dated the 8<sup>th</sup> April 2026 in summary refers to;

- The shed which will be a prefabricated steel shed of 50 m<sup>2</sup> will be delivered on site and assembled with no requirement for the creation or upgrading of access routes.
- The shed will be erected on an existing concrete hardstand located adjacent to existing sheds with no excavations, foundations piling or sub surface works and all construction vehicles will utilise existing tracks, hardstand and the immediately adjacent managed green area of the golf course.
- No alteration to site levels, drainage or surrounding land uses and will be within an established developed footprint on lands used as a yard for many years.
- The visual impact will be minimal.

- The Sligo CDP supports the development of sports facilities at appropriate locations.
- The application is supported by an AA Screening and a Sligo County Council assessment.
- The purpose of the shed is to accommodate machinery and is of necessity for the health and safety of staff working on the golf course.
- The grounds of appeal appear vexatious and largely irrelevant to the proposal as submitted.

#### 7.4. **Third Party response to responses to the grounds of appeal.**

The first party in a response dated the 5<sup>th</sup> May 2026 to the planning authority response in summary refers to;

- The submission initially refers to the matters of conflict of interest procedures in relation to assignment of an inspector and Commission members in the consideration of the appeal and the Code of Conduct in relation to this matter and that they will be observed in the determination of the appeal.
- The response submission also indicates that the appeal is not vexatious and the grounds are not irrelevant.
- The submission includes a number of documents as appendices which address issues of concern.
- Appendix 1 relates to the issue of project splitting referring to legal framework and matters, the chronological record of fragmented applications, AA Screening deficiencies and the loss of exempted development status.

In this context reference is made to an ongoing development programme without adequate planning oversight or planning permission, environment assessment or public participation. Maintenance does not encompass the creation of new facilities and the construction of new holes and relocation and expansion of compounds are not maintenance.

The strategy of applying for permission for minor ancillary elements while carrying out substantive development as purported maintenance is in itself evidence of project splitting.

Reference is made to court decisions on the matter.

Reference is made to the masterplan for the golf course and the current works are part of the masterplan. Reference is made in the master plan to upgrading the greenkeepers compound. It is not a standalone project and part of broader programme and project splitting.

The new storage cannot be considered independent and separate from the existing compound which has never had the benefit of a planning permission or environmental scrutiny and an assessment requires an overall assessment of the compound and the drawings do not reflect the overall context of the compound and existing structure. The substandard nature of the existing structure is raised and potential environmental concerns potentially arising and the applicant should not be permitted to extend a substandard building and the entire compound should be upgraded.

Reference is made to ongoing discussions between the applicant and the planning authority and the absence of this information being readily available.

The Commission should require an independent ecological survey to assess the current condition of SAC lands within the applicant's ownership.

There is a contention of an ongoing regulatory failure on the applicant's lands and reference is made to a chronological account of actions, planning applications and enforcement procedures in the context of proximity to the SAC and works that are not maintenance works.

The greenkeeper compound is not a standalone project and the proposed extension is necessitated by works and requirements of the overall masterplan.

Cumulative impact must be assessed.

The AA Screening does not assess source pathway receptor from the site to the SAC or addressed in-combination.

The conditions of the Planning Authority decision are inadequate with no reference to management of drainage.

Reference is made to the issue of exempted development and this is raised in the context of extending an existing compound.

The Commission is requested to refuse the development to ensure that the development is considered as part of integrated programme and conditions are also referred to for inclusion

- Appendix 2 refers to the submission of the applicant to the Draft Sligo CDP in particular highlight section 6 of the submission which refers to current issues and constraints affecting the golf club and which refers to the need to relocate and upgrade the greenkeepers shed.
- Appendix 3 refers to the issue of the golf club's activity and its impact on the Ballysadare Bay SAC.
- Appendix 4 refers to issues relating to planning enforcement relating to the greenkeeper compound and refers to AIE requests on a range of matters.
- Appendix 5 is a resubmission of the original appendix V relating to the Sligo Biodiversity Plan 2025-2030 and which has reference to European Sites and their qualifying interests.
- Appendix 6 is a resubmission of the original appendix W relating to the archaeology and natural heritage records including monuments in the proximity.
- Appendix 7 relates to material from the applicant's website and refers to a retroactive assertion that works in the masterplan require planning permission and this is relevant in the context of project splitting.
- Appendix 8 is the NPWS Conservation Survey of Ballysadare Bay SAC October 2013 and is relevant to assessing the condition of the designated habitat prior to the commencement of the golf club's development programme in 2015/2016.
- Appendix 9 is an expanded resubmission of the original appendix S relating to the AA Screening Plan prepared for P.A. Ref. No. PL22160 and refers to the presence of protected species during construction activity on the golf course and is relevant to the adequacy of AA Screening for the current proposal and to the in-combination assessment.

- Appendix 10 refers to documentation submitted as part of P.A. Ref. No. PL22/422 for the installation of “Dryloos” (toilet facilities).
- Appendix 11 refers to a document “Sand Dunes. They protect us! Let’s protect them dated April 2012 and refers to a section on the section sand dunes at Strandhill eroded by storms.
- Appendix12 refers to winter works at Strandhill bearing the date April 2026.
- Particular concern is raised in relation to what constitutes exempted development particularly in the context of extensive excavation.

7.5. Two further separate submissions received on the 5<sup>th</sup> May 2026 which refer to winter works on the golf course which was alluded to in the previous response.

## 8.0 **Assessment**

8.1. The main issues in this appeal relate to the stated reasons for which relate to the principle of the development in the context of the provisions of the current County Development Plan and matters raised in the grounds of appeal. Design and visual impact given the zoning also requires to be considered. Appropriate Assessment also requires to be considered. I am satisfied that no other substantive issues arise.

8.2. Before addressing these matters, it is noted that the grounds of appeal raise in the response submission of the 5<sup>th</sup> May 2026 matters of conflict of interest procedures in relation to assignment of an inspector and Commission members in the consideration of the appeal and the Code of Conduct in relation to this matter and that they will be observed in the determination of the appeal.

In relation to the latter at the end of this report, I state that this report represents my professional planning assessment and I wish to state by way of clarification addressing the grounds of appeal I do not have a conflict of interest in relation to any party associated with this planning application and appeal.

### 8.3. **The principle of the development**

The development as submitted is for the construction of a storage unit with an approximate floor area of 50m<sup>2</sup> which is located adjacent to an existing greenkeepers workshop, together with all ancillary works. The site forms part of an

existing compound within which there is a building used by greenkeepers for storage of materials and machinery in the maintenance of the golf course. The compound is located as a standalone facility within the golf course.

The golf club and the specific area relating to the proposed development is located within the OS zoning OS – open space and recreational amenities, as outlined in zoning map of the Strandhill Village Plan which is part of the current statutory Sligo County Development Plan 2024-2030. The Strandhill Village Plan also provides for a zoning map and objectives map. There is no specific objective indicated in relation to the appeal site on the objectives map and provisions of section 10.5.4 of the CDP Land-use Zoning Matrix provide for a golf course as normally permitted within an OS zoning.

The provision of a storage area/shed for machinery and materials associated with ongoing maintenance of a golf course would I consider in principle comply with the zoning of the site. Notwithstanding the principle of the development other matters would require consideration including siting and design, visual impact and other impacts including environmental matters.

#### **8.4. Grounds of appeal**

8.5. It is noted that the grounds of appeal raise a number of issues including exempted development, unauthorised development issues relating to enforcement.

8.6. In relation to matters relating to enforcement these are matters in relation to which An Coimisiún Pleanála does not have a statutory role. In relation to exempted development there are legal provisions and procedures set out in Section 5 of the Planning and Development Act 2000 as amended in relation to a declaration and referral on development and exempted development. In relation to unauthorised development these are matters to be considered in relation to enforcement and where there are questions in relation to this Section 5 may be the appropriate procedure to address the matter.

8.7. Specifically, in relation to the current proposal the applicant has made a valid planning application and therefore it is not cited as exempted development. Specific to the application as applied for, the development which is the subject of this appeal has not been or was not at the time of my site inspection constructed.

8.8. Questions may arise and this is raised by the appellant as to whether the hardstanding on which it is proposed to be constructed and the compound within which it is located is authorised or unauthorised. Planning and Development Regulations 2001 Article 9(1)(viii) Restrictions on exemption it is noted does refer to restrictions on exemption which *consist of or comprise the extension, alteration, repair or renewal of an unauthorised structure or a structure the use of which is an unauthorised use.*

Schedule 2 Part 1 Exempted Development – General Class 33 Development for amenity or recreational purposes provides for development consisting of the laying out and use of land but (c) specifically excludes golf. Class 34, however, provides for exemption relating to *works incidental to the maintenance and management of any golf course or pitch and putt course, including alterations to the layout thereof, excluding any extension to the area of a golf course.*

8.9. In relation to this appeal the development as applied for is for the construction of a storage unit with an approximate floor area of 50m<sup>2</sup> which is located adjacent to an existing greenkeepers workshop, together with all ancillary work which defines the scope of the application and appeal before the Commission and I would note that the status of other developments are not under consideration. Enforcement in respect thereof remains a matter for the Planning Authority.

8.10. The grounds of appeal also raise the issue of the overall development and its redevelopment as part of an overall masterplan and that the works in question are unauthorised and also potentially impact on designated European sites. Many of the issues relate to impact on the dune system and arise from modifications to the course layout and holes in immediate proximity to the sand dunes. Many of these issues do not relate to the area of the course in which the current application is located and would be a matter for enforcement.

8.11. Specific reference is made to the issue of project splitting and in the grounds of appeal it is indicated that reference is made in the overall masterplan to the greenkeeper compound and its upgrading as part of the overall masterplan and that incremental development is occurring which would individually be sub threshold development and in effect evades a cumulative assessment.

Specifically, the development is for a 50m<sup>2</sup> storage shed within an existing hardstand compound with no emissions arising. Schedule 5 Parts 1 and 2 of the Planning and Development Regulations 2001 as amended outline Development for the purposes of Part 10 Article 93 in relation to EIAR and the proposed development is not a prescribed development which should be subject to an EIAR.

The grounds of appeal largely refer to works of altering the golf course in particular in the immediate vicinity of the sand dunes which are removed from the location of the development which is the subject of the current appeal. In relation to project splitting although the works referred to and the development under appeal are within the golf course, I do not consider that the current proposal can be considered to represent a significant element of a larger project or represent fragmentation of a larger related project of golf course redevelopment to circumvent environmental assessment. I will consider this matter further under Appropriate Assessment.

**8.12. Design and visual impact.**

8.13. The existing greenkeeper shed and hardstand development is located within a compound which is screened and integrated into its immediate surroundings and not readily visible from a wider area.

The proposed shed is a framed structure 10105mm by 5150mm externally with a pitch roof and an external cladding with an overall height to the pitch of 3736mm which will be located on an existing concrete slab located immediately adjacent to (and to the north of) the existing shed. It is indicated that the shed will be used for some of the larger items of machinery and plant associated with golf course maintenance and with the exception of an electrical supply, the building will not be connected to any services. Surface water will percolate into the adjacent ground. The building will be accessed directly from the edge of the 18th fairway, with no additional hard standing proposed.

8.14. I do not consider that the proposed development given its scale and height will give rise an adverse visual impact. In relation to impact in relation to surface/storm water drainage it is noted that the third party refers to a stream / drain adjacent to the site, which flow to the SAC but there is no visual evidence of a drain in the vicinity of the area to which the development under appeal relates or any waterbodies or surface watercourses on or adjoining the existing compound. No alteration to the existing

drainage is proposed and any surface water arising will continue to discharge and percolate into the groundwater adjacent to the development. I do however consider that consideration by way of a condition to provision of an oil interceptor to prevent any discharge of oil and other chemicals should be included in a grant of permission.

## 9.0 AA Screening

- 9.1. The development comprises in effect a relatively minor development as outlined in section 2 in the Inspectors report.
- 9.2. As already referred to section 5.4 of this report the subject site of the proposed development is in close proximity to a number of Natura 2000 sites the Ballysadare Bay SAC site code 000622, the Ballysadare Bay SPA (004129) which overlaps with the SAC and the Unshin River SAC (001898) a river system which runs from Lough Arrow north to Ballysadare Bay and which adjoins the Ballysadare Bay SAC the Ballysadare Bay SPA.
- 9.3. In terms of potential impacts and effects the most proximate is the Ballysadare Bay SAC site code 000622 and the Ballysadare Bay SPA site code 004129. I refer to Appendix 1 of this report.
- 9.4. 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 the proposed development individually or in combination with other plans or projects would not be likely to give rise to significant effects on Ballysadare SAC or Ballysadare SPA or other in view of the conservation objectives of these sites and is therefore excluded from further consideration. Appropriate Assessment is not required.

This determination is based on:

- The small scale and nature of the proposed works.
- The location of the site outside European sites and the separation distance therefrom, and the and lack of connections.
- Taking into account the screening report and determination of the planning authority.

## 10.0 Water Framework

10.1. The subject site is not located immediate to a waterbody The development comprises construction works on an existing hardstand as referred to in section 2 of this report.

10.2. I have assessed the proposed development and have considered the objectives as set out in Article 4 of the Water Framework Directive which seek to protect and, where necessary, restore surface and ground water waterbodies in order to reach good status (meaning both good chemical and good ecological status), and to prevent deterioration. Having considered the nature, scale and location of the project, I am satisfied that it can be eliminated from further assessment because there is no conceivable risk to any surface and/or groundwater water bodies either qualitatively or quantitatively. The reason for this conclusion is as follows:

- Nature of works regarding the nature and scale of the development.
- The context of the surrounding area.
- Location and distance from nearest Water bodies and lack of hydrological connections.

### Conclusion

I conclude that on the basis of objective information, that the proposed development will not result in a risk of deterioration on any water body (rivers, lakes, groundwaters, transitional and coastal) either qualitatively or quantitatively or on a temporary or permanent basis or otherwise jeopardise any water body in reaching its WFD objectives and consequently can be excluded from further assessment.

## 11.0 Recommendation

11.1. I recommend that permission be granted.

## 12.0 Reasons and Considerations

12.1. Having regard to the nature of the development, the existing established use on the lands; the design, nature and scale of the proposed development and the pattern and character of development in the vicinity; the planning history of the site and to the provisions of the Sligo County Development Plan 2024-2030, it is considered

that, subject to compliance with the conditions set out below, the proposed development would not have a significant adverse effect and would not detract from the visual character of the area. The development would, therefore, be in accordance with the proper planning and sustainable development of the area.

### 13.0 Conditions

1.	<p>The development shall be carried out in accordance with the drawings and particulars as received by the Planning Authority on the 6<sup>th</sup> day of January 2026 except as may otherwise be required in order to comply with the following conditions. Where such conditions require points of detail to be agreed with the Planning Authority, these matters shall be the subject of written agreement and shall be implemented in accordance with the agreed particulars.</p> <p><b>Reason:</b> In the interest of clarity</p>
2.	<p>The development shall be amended to provide for a drainage system which shall include surface water collection and disposal and shall provide for the installation of an oil interceptor details of which shall be submitted to the planning authority prior to the commencement works and which shall be installed and maintained in accordance with the detailed requirements of the planning authority.</p> <p><b>Reason:</b> In the interests of orderly development and to ensure a proper standard of development.</p>
3.	<p>The developer shall pay to the planning authority a financial contribution in respect of public infrastructure and facilities benefiting development in the area of the planning authority that is provided or intended to be provided by or on behalf of the authority in accordance with the terms of the Development Contribution Scheme made under section 48 of the Planning and Development Act 2000, as amended. The contribution shall be paid prior to commencement of development or in such phased payments as the planning authority may facilitate and shall be subject to any applicable indexation provisions of the Scheme at the time of payment. Details of the</p>

application of the terms of the Scheme shall be agreed between the planning authority and the developer or, in default of such agreement, the matter shall be referred to An Bord Pleanála to determine the proper application of the terms of the Scheme.

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

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

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Derek Daly  
Planning Inspector

26<sup>th</sup> May 2026

### Form 1 - EIA Pre-Screening

<b>Case Reference</b>	PL 500864-SO-26
<b>Proposed Development Summary</b>	The construction of storage unit and associated site works.
<b>Development Address</b>	Carrowbunnaun, Strandhill, County. Sligo.
<b>1. Does the proposed development come within the definition of a 'project' for the purposes of EIA?</b>	<input type="checkbox"/> <b>X YES</b> , it is a 'Project'. Proceed to Q2.
<b>2. Is the proposed development of a CLASS specified in <u>Part 1</u>, Schedule 5 of the Planning and Development Regulations 2001 (as amended)?</b>	
<input type="checkbox"/> , it is a Class specified in <b>Part 1</b> .	<b>No</b>
<input checked="" type="checkbox"/> <b>X No</b> ,	
<b>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?</b>	
<b>x No</b> , 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. <b>No Screening required.</b>	
<b>No</b> , the proposed development is of a Class and meets/exceeds the threshold.	
<b>No</b> , the proposed development is of a Class but is sub-threshold.  <b>Preliminary examination required. (Form 2)</b>  Yes	

**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)
Yes <input checked="" type="checkbox"/>	Pre-screening determination conclusion remains as above (Q1 to Q3)

Inspector: Derek Daly      Date: 15<sup>th</sup> May 2026

Appendix

<p align="center"><b>Screening for Appropriate Assessment</b></p> <p align="center"><b>Test for likely significant effects</b></p>	
<b>Step 1: Description of the project and local site characteristics</b>	
<b>Brief description of project</b>	<p>The construction of storage unit and associated site works.</p> <p>Carrowbunnaun, Strandhill, County. Sligo.</p>
<b>Brief description of development site characteristics and potential impact mechanisms</b>	<p>The site to which the development relates has a stated area of 0.008 hectares.</p> <p>The site is located in the townland of Carrowbunnaun, and is located within Strandhill Golf Club in County Sligo. The appeal site is adjacent to the greenkeeper’s workshop and hardstand/compound and between two fairways on the golf course.</p> <p>The site is described in the AA Screening Report as highly modified and supports a limited range of habitats. The existing concrete hardstand and associated built elements are classified as Buildings and Artificial Surfaces (BL3). Surrounding areas comprise intensively managed Amenity Grassland (GA2) in the form of a golf course green, which is subject to regular mowing and maintenance and is of low ecological value.</p> <p>The construction of a storage unit with an approximate floor area of 50m<sup>2</sup> which is located adjacent to an existing greenkeepers workshop, together with all ancillary works.</p>

	<p>The shed is a framed structure 10105mm by 5150mm externally with a pitch roof and an external cladding with an overall height to the pitch of 3736mm.</p> <p>The development is described as comprising the delivery and on-site assembly of a prefabricated steel shed.</p> <p>All component parts will be delivered to the site via the existing golf club access tracks, with no requirement for the creation or upgrading of access routes. The shed will be erected on an existing concrete hardstand which is located adjacent to existing sheds within the golf course green area.</p> <p>No excavations, ground reduction, foundations, piling or other sub-surface works are required as part of the development. All construction machinery, materials and personnel will utilise the existing access tracks, the existing hardstand and the immediately adjacent managed green area of the golf course.</p> <p>There will be no alteration to existing site levels, drainage patterns or surrounding land uses, and the works will be confined entirely to the established developed footprint associated with the existing golf club infrastructure.</p> <p>Ballysadare Bay SAC site code 000622 and Ballysadare Bay SPA (004129) lie to the west and south of the site.</p> <p>Part of the golf course is located within the SAC however the area in which the storage unit is proposed is not within the SAC.</p>
<b>Screening report</b>	Yes
<b>Natura Impact Statement</b>	No
<b>Relevant submissions</b>	No prescribed body submissions. Grounds of appeal raise AA concerns.

<b>Step 2. Identification of relevant European sites using the Source-pathway-receptor model</b>				
<b>European Site (code)</b>	<b>Qualifying interests<sup>1</sup> Link to conservation objectives (NPWS, date)</b>	<b>Distance from proposed development (km)</b>	<b>Ecological connections<sup>2</sup></b>	<b>Consider further in screening<sup>3</sup> Y/N</b>
Ballysadare Bay SAC site code 000622	[1130] Estuaries [1140] Tidal Mudflats and Sandflats [2110] Embryonic Shifting Dunes [2120] Marram Dunes (White Dunes) [2130] Fixed Dunes (Grey Dunes)* [2190] Humid Dune Slacks [1014] Narrow-mouthed Whorl Snail (Vertigo angustior) [1365] Common (Harbour) Seal (Phoca vitulina)	250m	No direct hydrological or other ecological pathway	<b>Yes</b> due to proximity
The conservation objectives are: To maintain the favourable conservation condition:		Estuaries Tidal Mudflats and Sandflats Embryonic Shifting Dunes Narrow-mouthed Whorl Snail (Vertigo angustior) Common (Harbour) Seal (Phoca vitulina)		

To restore the favourable conservation condition:	Marram Dunes (White Dunes) Fixed Dunes (Grey Dunes)* Humid Dune Slacks
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Ballysadare Bay SPA (004129)	Light-bellied Brent Goose (Branta bernicla hrota) [A046] Grey Plover (Pluvialis squatarola) [A141] Dunlin (Calidris alpina) [A149] Bar-tailed Godwit (Limosa lapponica) [A157] Redshank (Tringa totanus) [A162] Wetland and Waterbirds [A999]	375m	No direct hydrological or other ecological pathway	<b>Yes</b> due to proximity
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Other sites are identified in the Screening Report within the wider area, however, having regard to the separation distances and absence of pathways thereto, these are excluded from further consideration, including:

- Ballintemple and Ballygilgan SPA
- Sligo/Leitrim Uplands SPA
- Ardboline Island and Horse Island SPA
- Drumcliff Bay SPA
- Aughris Head SPA
- Cummeen Strand SPA
- Ben Bulbin, Gleniff and Glenade Complex SAC
- Ox Mountains Bogs SAC
- Unshin River SAC
- Streedagh Point Dunes SAC

- Knockalongy and
- Knockachree Cliffs SAC
- Union Wood SAC
- Lough Gill SAC
- Cummeen
- Strand/Drumcliff Bay (Sligo Bay) SAC

The Conservation objective is to maintain the favourable conservation condition of species and habitats.

**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
<p><b>Site 1: Ballysadare Bay SAC (000622)</b></p> <p>[1130] Estuaries</p> <p>[1140] Tidal Mudflats and Sandflats</p> <p>[2110] Embryonic Shifting Dunes</p> <p>[2120] Marram Dunes (White Dunes)</p> <p>[2130] Fixed Dunes (Grey Dunes)*</p> <p>[2190] Humid Dune Slacks</p> <p>[1014] Narrow-mouthed Whorl Snail (Vertigo angustior)</p>	<p>The proposed development will take place on an existing concrete hardstand within a managed golf course setting. The installation of a small prefabricated steel shed will not involve excavation, ground disturbance, changes to drainage, abstraction, discharge, or any interaction with underlying soils or groundwater.</p> <p>There are no surface water features within or adjoining the site. The groundwater body does not, in itself, indicate a hydrogeological pathway capable of transmitting effects to the SAC.</p> <p>In the absence of any subsurface works or changes to groundwater levels or quality, no credible hydrological or hydrogeological</p>	<p>No potential for likely significant effects on this European site identified, when considered in the absence of any mitigation.</p> <p>No further assessment is required</p>

<p>[1365] Common (Harbour) Seal (<i>Phoca vitulina</i>)</p>	<p>pathway exists.</p> <p>Surveys indicate that the site does not support, and is not adjacent to, habitats suitable for narrow-mouthed whorl snail, and no suitable damp calcareous grassland, fen or marsh habitats occur within or adjacent to the works area.</p> <p>The proposed development will not result in habitat loss, disturbance, or changes to ecological conditions relevant to the qualifying interests of the SAC. No disturbance to Harbour seal will occur due to separation distances.</p>	
	<p><b>Likelihood of significant effects from proposed development (alone): No</b></p>	
	<p><b>If No, is there likelihood of significant effects occurring in combination with other plans or projects?</b></p> <p>While in-combination effects are raised in the grounds of appeal, having regard to the conclusions above, it is not considered that the effects of the development might become significant when examined in combination with the effects of other proposals.</p>	
	<p><b>Possibility of significant effects (alone) in view of the conservation objectives of the site*</b></p>	
	<p><b>Impacts No</b></p>	<p><b>Effects No</b></p>
<p><b>Site 2: Ballysadare Bay SPA</b></p> <p>(004129) Light-bellied Brent Goose (<i>Branta bernicla hrota</i>) [A046]</p>	<p>There will be no direct effects on this European Site as the proposed development is located entirely outside of, and approximately 375m north of, the SPA boundary.</p> <p>There will be no direct loss of any SPA-designated habitat or supporting</p>	<p>No potential for likely significant effects on this European site was identified, when considered in the absence of any mitigation, No further assessment is</p>

<p>Grey Plover (<i>Pluvialis squatarola</i>) [A141]</p> <p>Dunlin (<i>Calidris alpina</i>) [A149]</p> <p>Bar-tailed Godwit (<i>Limosa lapponica</i>) [A157]</p> <p>Redshank (<i>Tringa totanus</i>) [A162]</p> <p>Wetland and Waterbirds [A999]</p>	<p>wetland habitat for Special Conservation Interest (SCI) bird species.</p> <p>The site does not support any habitats suitable for QI's, or other waterbird species for which the SPA is designated.</p> <p>A disturbance assessment was undertaken and indicative non-breeding-season disturbance distances for relevant species are identified</p> <p>Given separation from the SPA and the lack of suitable habitat on site, no potential for disturbance or displacement of SCI bird species due to noise, lighting, or activity during construction or operation has been identified.</p>	<p>required.</p>
	<p><b>Likelihood of significant effects from proposed development (alone): No</b></p>	
	<p><b>If No, is there likelihood of significant effects occurring in combination with other plans or projects?</b></p> <p>While in-combination effects are raised in the grounds of appeal, having regard to the conclusions above, it is not considered that the effects of the development might become significant when examined in combination with the effects of other proposals.</p>	
<p><b>Step 4 Conclude if the proposed development could result in likely significant effects on a European site</b></p>		

I conclude that the proposed development (alone) would not result in likely significant effects on Ballysadare SAC or Ballysadare SPA. The proposed development would have no likely significant effect in combination with other plans and projects on any European site(s). No further assessment is required for the project].

No mitigation measures are required to come to these conclusions.

## **Screening Determination**

### **Finding of no likely significant effects**

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 the proposed development individually or in combination with other plans or projects would not be likely to give rise to significant effects on Ballysadare SAC or Ballysadare SPA or other in view of the conservation objectives of these sites and is therefore excluded from further consideration. Appropriate Assessment is not required.

This determination is based on:

- The small scale and nature of the proposed works.
- The location of the site outside European sites and the separation distance therefrom, and the and lack of connections.
- Taking into account the screening report and determination of the planning authority.

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Derek Daly  
Planning Inspector

26<sup>th</sup> May 2026