Dáire Littleton Caden

From: LAPS
Sent: Déardaoin 8 Deireadh Fómhair 2026 16:35
To: Dáire Littleton Caden; Appeals2
Subject: FW: Your Ref: ACP-324446-26 Our Ref: SID-KY-2024-32
Attachments: ACP-324446-26.pdf

From: Housing Manager DAU <Manager.DAU@npws.gov.ie>
Sent: Thursday, October 8, 2026 4:02 PM
To: LAPS <laps@pleanala.ie>
Subject: Your Ref: ACP-324446-26 Our Ref: SID-KY-2024-32

> **Caution:** This is an **External Email** and may have malicious content. Please take care when clicking links or opening attachments. When in doubt, contact the ICT Helpdesk.

A Chara,

Attached please find the nature conservation observations/recommendations of the Department in relation to the aforementioned Substitute Consent Application.

Can you please confirm receipt of same?

Kind Regards,
Sinéad

—
Sinéad O' Brien
Executive Officer
—
Aonad na nIarratas ar Fhorbairt
Development Applications Unit
Oifigí an Rialtais
Government Offices
Bóthar an Bhaile Nua, Loch Garman, Contae Loch Garman Y35 AP90
Newtown Road, Wexford, County Wexford Y35 AP90
—

An Roinn Tithíochta,
Rialtais Áitiúil agus Oidhreachta
Department of Housing,
Local Government and Heritage

Your Ref: ACP-324446-26
Our Ref: SID-KY-2024-32
(Please quote in all related correspondence)

8 October 2026

The Secretary
An Bord Pleanála
64 Marlborough Street
Dublin 1
D01 V902

Via email to laps@pleanala.ie

Re: Notification under the Planning and Development Act, 2000, as amended.

Re: Substitute Consent Application for use of land as short stay camping site, demolition of toilet and shower block, alteration of existing toilet and shower facilities, Trenching works and associated site works at Inch Beach Campsite, in the townlands of Ardroe and Inch, Inch beach, Annascaul, County Kerry

A Chara

I refer to correspondence received in connection with the above.

Outlined below are nature conservation observations/recommendations of the Department.

Dingle Peninsula SPA: loss of chough feeding habitat
Most of the southern field and recent campervan pitches (see Figure 1.3 (p. 6) of the Planning Report) are within the Dingle Peninsula Special Protection Area (SPA) (Site Code:004153) (see Figure 1 in the below Appendix), which was designated[1], amongst the habitats of other bird species, for chough habitat. The number of recorded pairs of choughs in this SPA has declined by over 40% between 2003 and 2021[2].

The Goldcrest Environmental Services Report[3] did not record any use of the subject site by chough over a one-year survey period (2025-2026). The Screening for remedial Appropriate Assessment report (p. 35) concluded that significant effects on chough were unlikely:
"Given the Site's historical use, the sward height likely exceeded the ideal height due to insufficient low-intensity agricultural management during the Construction and Operational Phases."

[1] Classified under S.I. No. 480 of 2012
[2] Colhoun, K., *et al.* (2024) The status and distribution of chough in Ireland: Results of the national survey 2021. *Irish Wildlife Manuals* No. 151: 1-53.
[3] Appendix C to the remedial Natura Impact Statement

Also, the remedial Natura Impact Statement (rNIS, p. 35) refers to the closest nesting site as being c.7.4 km distant at Annascaul Lough.

The Department disagrees with the conclusion of no significant effects, as the reasoning is based on a lack of current grassland management and use, rather than (a) the original pre-development status, and (b) the future restoration potential of the site (the Conservation Objective[4] is to restore favourable conservation status of this species). The 'historical use' seems to refer to the period after 2018, when the development began.

It can be seen from Figures 1.2-1.4 in the Planning Report that the four fields within the Dingle Peninsula SPA to the east of the subject site have been under conventional agricultural management with a dense sward due to fertilizer application, in 2017, 2019 and 2023. However, the 1996 O.S. aerial photograph, available on the GeoHive site, indicates that the fields, and the SPA field in the subject site, were more open pasture in 1995. As open pasture, they were more likely to have been used by choughs for feeding, and this is probably why they were included within the SPA boundary despite the fields being isolated at the edge of the European site.

Also, it is possible that the rock armour placed on the cliffs north-west of Inch strand (in the first decade of this century) led to the abandonment of a chough nest site, resulting in there being less use of these fields compared to when the nearby nest site was extant. If this was the case, then, especially given the >40% apparent decline in numbers on the SPA, the option of future habitat restoration at this end of the SPA cannot be ruled out. For instance, chough nest-boxes or artificial ledges have been used in Wales to augment sites lacking in natural cavities[5]. In addition, the adjacent Inch spit, now part of Páirc Náisiúnta na Mara Ciarraí and part of the Castlemaine Harbour SPA, also has a Conservation Objective to maintain the favourable conservation status of chough[6].

At the time of initial proposal for designation, the part of the field nearest the road is unlikely to have been used due to disturbance from people walking the road (disturbance tolerances by chough of walking tourists was cited as up to 35m by Owen (1989)[7]), so the initial hardstanding in this area is unlikely to have had an impact, even if it was pasture. Nevertheless, irreversible loss of grassland habitat, albeit at the very edge of the SPA, should be minimized. Consequently, it is recommended that the remedial NIS fully assesses the

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[4] NPWS (2025) Conservation Objectives: Dingle Peninsula SPA 004153. Version 1. htt ps.//www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO004153.pdf

[5] Cross, T. and Stratford, A. (2008) Conservation Methods: Chough nest boxes. *BTO News*, May – June 2008: 16-17

[6] NPWS (2011) Conservation Objectives: Castlemaine Harbour SAC 000343 & SPA 004029. Version 2.0. https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO004029.pdf

[7] Owen, D.A.L. (1989) Vigilance by foraging choughs in relation to tourist disturbance. Pp. 57-62. In: Bignal, E. and Curtis, D.J. (eds.) *Choughs and land-use in Europe*. Scottish Chough Study Group, Tarbert, Argyll, Scotland.

effects of the existing and proposed development on the integrity of chough habitat within the Dingle Peninsula SPA.

You are requested to send any further communications to this Department's Development Applications Unit (DAU) at manager.dau@npws.gov.ie, or to the following address:

The Manager
Development Applications Unit (DAU)
Government Offices
Newtown Road
Wexford
Y35 AP90

Is mise, le meas

Sinéad O' Brien
Development Applications Unit
Administration

Appendix

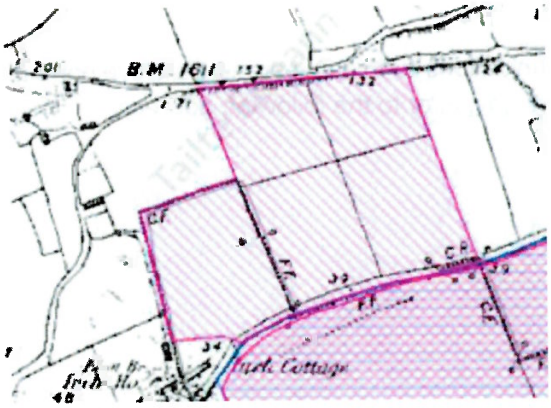


Figure 1. Upper five fields are within the Dingle Peninsula SPA; the area south of the road is within the Castlemaine Harbour SAC and SPA. *Source*: www.npws.ie (accessed 05.10.26).

Our Case Number: ACP-324446-26

An Coimisiún Pleanála

Department of Housing, Local Government and Herit
The Manager
Development Applications Unit
Government Offices
Newtown Road
Co. Wexford
Y35 AP90

Date: 03 November 2026

Re: Use of land as short stay camping site, demolition of toilet and shower block, alteration of existing toilet and shower facilities, Trenching works and associated site works. A remedial Natura Impact Statement (rNIS) accompanies this application.
Inch Beach Campsite, in the townlands of Ardroe and Inch, Inch beach, Annascaul, Co. Kerry

Dear Sir / Madam,

An Coimisiún Pleanála has received your submission in relation to the above-mentioned application.

If you have any queries in the meantime, please contact the undersigned officer of the Commission at appeals@pleanala.ie.

Yours faithfully,

Suzanne Cleary
Administrative Assistant
Direct Line:

SC20

Teil **Tel** (01) 858 8100
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