The notice must also state that written submissions or observations in respect of the draft Direction may be made to the planning authority during the consultation period.

Also in line with statutory requirements, a Chief Executive's report is to be prepared on the public consultation period under section 31(8), and must be furnished to the Office, the elected members and the Minister, no later than 4 weeks after the public consultation process is completed, for further consideration.

In accordance with section 31(9) of the Act, the report of the Chief Executive must:

(a) summarise the views of any person who made submissions or observations to the planning authority;
(b) summarise the views of and recommendations (if any) made by the elected members of the planning authority;
(c) summarise the views of and recommendations (if any) made by the regional assembly, and
(d) make recommendations in relation to the best manner in which to give effect to the draft Direction.

In addition, the elected members of the planning authority may make a submission to the Office of the Planning Regulator at any time up to the conclusion of the 2-week public consultation period referred to above and must also send any such submissions to me, as Minister.

The Office will then consider the Chief Executive's report together with any submissions made and will make a further recommendation to me, as Minister, regarding whether the Direction is to be issued with or without minor amendments, or not issued.

Where the Office is of the opinion that a material amendment to the draft Direction is required, or further investigation is necessary, or it is necessary for another reason, then the Office may appoint an inspector no later than 3 weeks after receipt of the Chief Executive's report, prior to making a final recommendation to me.

Should you have any queries in relation to complying with the foregoing process now underway, please contact ForwardPlanning@housing.gov.ie.

73

Yours sincerely,

Alan Dillion TD
Minister of State for Local Government and Planning

Copied to:

- Cathaoirleach, Sligo County Council, Sligo County Council, County Hall, Riverside, Sligo, F91 Y763
- Director, Northern and Western Regional Assembly, The Square, Ballaghaderreen, Co. Roscommon, F45 W674.
- Office of the Planning Regulator, Fourth Floor (West Wing) Park House, Grangegorman, 191-193A North Circular Road, Dublin 7, D07 EWV4.

DRAFT DIRECTION IN THE MATTER OF SECTION 31

OF THE PLANNING AND DEVELOPMENT ACT 2000 (as amended)

Sligo County Development Plan 2024 - 2030

"Development Plan" means the Sligo County Development Plan 2024 - 2030

"Planning Authority" means Sligo County Council.

"RSES" means the Regional Spatial and Economic Strategy for the Northern and Western Region

"NPF" means the National Planning Framework

The Minister of State at the Department of Housing, Local Government and Heritage in exercise of the powers conferred on him by section 31 of the Planning and Development Act 2000 (No.30 of 2000) ("the Act") and the Housing, Local Government and Heritage (Delegation of Ministerial Functions) Order 2024 (S.I. No. 234 of 2024), and consequent to a recommendation made to him by the Office of the Planning Regulator, hereby directs as follows:

(1) This Direction may be cited as the Planning and Development (Sligo County Development Plan 2024 – 2030) Direction 2024.

(2) The Planning Authority is hereby directed to take the following steps with regard to the County Development Plan:

a. Delete the following zoning objectives from the adopted County Development Plan:

(i) the lands on the L3203 on the western approach to Grange, i.e. the subject land reverts to not zoned from Strategic Land Reserve;

b. Delete the following material alterations from the adopted County Development Plan such that the subject lands revert to as indicated in the draft County Development Plan:

(i) PAZ 9, i.e. the subject land reverts to Strategic Land Reserve (SLR) from New Residential (nRES);

(ii) PAZ 11, i.e. the subject land reverts to Green Belt from New Residential (nRES) and Open Space (OS) and the Development Limit reverts to the draft Plan;

(iii) PAZ 12, i.e. the subject land reverts to Green Belt (GB) from New Residential (nRES);

(iv) PAZ 13, i.e. the subject land reverts to Strategic Land Reserve (SLR) from New Residential (nRES);

(v) PAZ 14, i.e. the subject land reverts to Green Belt (GB) from New Residential (nRES);

(vi) PAZ 15, i.e. the subject land reverts to Green Belt (GB) from New Residential (nRES) and Strategic Land Reserve (SLR);

(vii) PAZ 31, i.e. the subject lands revert to Open Space (OS) from New Residential (nRES)

(viii) PAZ 32, i.e. the subject lands revert to Green Belt (GB) from New Residential (nRES)

(ix) PAZ 33, i.e. the subject lands revert to Green Belt from New Residential (nRES)

(x) PAZ 42, i.e. the subject lands revert to Green Belt (GB) from New Residential (nRES)

(xi) PAZ 45, i.e. the subject lands revert to Green Belt (GB) from New Residential (nRES)

(xii) PAZ 57, i.e. the subject lands revert to Strategic Land Reserve (SLR) from New Residential (nRES)

(xiii) PAZ 62, i.e. the subject lands revert to Green Belt from Tourism (TOU)

(xiv) PAZ 63, i.e. the subject lands revert to Green Belt (GB) from Rural Village (RV)

(xv) PAZ 76, i.e. the subject lands revert to Green Belt (GB) from Rural

Village (RV)

(xvi) PAZ 79, i.e. the subject lands revert to Green Belt (GB) from Rural Village (RV), and the Development Limit reverts to the draft Plan

(xvii) PAZ 80, i.e. the subject lands revert to Green Belt (GB) from Rural Village (RV), and the Development Limit reverts to the draft Plan

(xviii) PAZ 34, i.e. the subject lands revert to Green Belt (GB) from Tourism (TOU) and Open Space (OS)

(xix) PAZ 41, i.e. the subject lands revert to Green Belt (GB) from Business/Industry/ Enterprise (BIE)

(xx) PAZ 44, i.e. the subject lands revert to Green Belt (GB) from Business/Industry/ Enterprise (BIE)

c. Delete the following text at section 33.9.1:

Where direct vehicular access onto national primary roads cannot be avoided (such as situations arising from national road realignment schemes), a Departure from TII Publications Standards DN-GEO-03060 with justification shall be required, as provided for in Section 5.5. Direct Accesses of DN-GEO-03060. In all cases, the number of accesses on to the national road should be minimised, either by consolidating them into a single access point, or connecting them to existing side roads. The sight distances required for access onto national primary and secondary roads are set out in Table 33.8. The sight distances are measured from the access point to the near-side edge of the carriageway in accordance with the TII Publications Standards DN-GEO-03031 and DN-GEO-03060.

and apply all necessary consequential updates to the text of the plan consistent with the foregoing.

STATEMENT OF REASONS

I. The County Development Plan as made includes material alterations to the draft County Development Plan for zoning objectives in peripheral and/or non-sequential, and/or unserviced locations, and/or outside the relevant CSO settlement boundaries, and/or do not conserve and enhance the natural and cultural heritage of County Sligo, providing additional residential land in excess of what is required under the growth targets of the core strategy for Sligo Town, Grange, Enniscrone, Ballysadare, Strandhill, Curry and Gorteen.

The zoning objectives and material alterations would individually and cumulatively encourage a pattern of development in particular locations which is inconsistent with the core strategy of the County Development Plan, NPO 3c, NPO 18a, NPO 60, NPO 72a-c of the National Planning Framework (NPF), RPO 3.2(b), RPO 3.7.39, RPO 5.14 of the RSES, and section 10(2)(n) of the Act concerning the promotion of sustainable settlement and transport strategies and the obligations under the Climate Action and the Low Carbon Development Act 2015, as amended (the Climate Act), and fails to have regard to the policy and objective for settlement capacity audits and the policy and objective for sequential zoning under the Development Plans, Guidelines for Planning Authorities (2022) (the Development Plans Guidelines).

II. The County Development Plan as made also includes material alterations to the draft Plan, which zone additional land for Tourism in the area of Enniscrone and Easky, and for Business/Industry/Enterprise in the area of Ballysadare which can accommodate a range of high intensity employment uses. These zoning objectives are located in peripheral and unserviced locations, outside the relevant CSO settlement boundaries and would encourage a pattern of development that is inconsistent with NPO 18a and NPO 74 to align the NPF and the NDP through the delivery of National Strategic Outcomes including NSO 1 compact growth and NSO 2 Enhanced Regional Accessibility, NPO 72a-c tiered approach to zoning, RPO 6.5 of the RSES to protect the strategic transport function of national roads, and section 10(2)(n) of the Act concerning the promotion of sustainable settlement and transport strategies and the

obligations under the Climate Act, and fails to have regard to the policy and objective for sequential zoning under the Development Plans Guidelines a section 2.5 of National Roads Guidelines for Planning Authorities (2012) (National Roads Guidelines).

III. The County Development Plan as made includes material alterations to zone land for vulnerable and highly vulnerable uses in Sligo Town, Easky, Ballinafad, Curry and Gorteen which lands are partially located within flood zone A and/or B, inconsistent with NPO 57 to avoid inappropriate development in all areas at risk of flooding in accordance with the Flood Risk Management Guidelines for Planning Authorities (2009), and RPO 3.10 to implement the recommendations of the Flood Guidelines.

IV. The County Development Plan as made includes a material amendment to introduce text into section 33.9.1 of the Plan which provides for direct vehicular access onto national primary roads in certain circumstances inconsistent with NPO 74 to align the National Planning Framework and the National Development Plan through the delivery of National Strategic Outcomes including NSO 2 Enhanced Regional Accessibility, and RPO 6.5 to give effect to NSO 2 and to maintain the strategic capacity and safety of the national road network, and fails to have regard to sections 2.5 and 2.6 of the Spatial Planning and National Roads Guidelines to maintain the capacity, efficiency and safety of national roads, avoiding the creation of any additional access point from new development or the generation of increased traffic from existing accesses to national roads to which speed limits greater than 60 km/h apply.

V. Further, the statement under Section 28(1A)(b) attached to the Development Plan as made fails to include information that demonstrates that the planning authority has formed the opinion that it is not possible to implement the policies and objectives contained in the Development Plans Guidelines for Planning Authorities (2022), and/or in the Spatial Planning and National Roads Guidelines and/or in The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) because of the nature and characteristics of the area or part of the area and to give reasons for the forming

of that opinion and to explain why it is not possible to implement the policies and objectives of the Minister, contrary to Section 28(1B)(b);

VI. The Development Plan has not been made in a manner consistent with, and has failed to implement, the recommendations of the Office of the Planning Regulator made under section 31AM of the Act.

VII. The Minister is of the opinion that the Development Plan as made is not consistent with the objectives of the RSES, contrary to section 10(1A) and section 27(1) of the Act.

VIII. The Minister is of the opinion that the Development Plan as made is not consistent with National Policy Objectives 3c, 18a, 57, 60, 72a – c and 74 of the National Planning Framework.

IX. The Minister is of the opinion that the Development Plan as made fails to set out an overall strategy for the proper planning and sustainable development of the area.

X. The Development Plan is not in compliance with the requirements of the Act.

GIVEN under my hand,

Minister for Housing, Local Government and Heritage

day of Month, year.

Oifig an Rialaitheora Pleanála
Office of the Planning Regulator

OPR Ref: MA-029-22

5th July 2024

Planning Section,
Sligo County Council,
City Hall,
Quay Street,
Sligo,
F91 Y763.

Re: Material Alterations to Draft Sligo County Development Plan 2024-2030

A chara,

Thank you for your authority's work in preparing the Material Alterations to the draft Sligo County Development Plan 2024-2030 (material alterations to the draft Plan).

As your authority will be aware, one of the key functions of the Office of the Planning Regulator (the Office) includes strategic evaluation and assessment of statutory plans to ensure consistency with legislative and policy requirements relating to planning. The Office has evaluated and assessed the material alterations to the draft Plan under the provisions of sections 31AM (1) and (2) of the *Planning and Development Act, 2000*, as amended, (the Act) and within the context of the Office's earlier recommendations and observations.

As outlined in the submission of the Office to the draft Plan, the Office considered the draft Plan to be generally consistent with policies in the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES) for the North and Western Regional Assembly area, and recommended changes to enhance its alignment with national and regional policies in the aforementioned, and for consistency with the *Housing Supply Target Methodology for Development Planning, Guidelines* (2020), the *Development Plans, Guidelines for Planning Authorities*

Teach na Páirce, 191-193A An Cuarbhóthar Thuaidh, Baile Átha Cliath 7, D07 EWV4.
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additional growth to Sligo town as the Regional Growth Centre and one of the main drivers of growth for the region.

The Office notes the omission of the Strategic Land Reserve from the western approach to Grange Village, in accordance with Recommendation 2, and the proposed restriction of uses within the Community Facilities land use zone as required by Recommendation 3.

In this regard, the material alterations to the draft Plan include very extensive proposed material amendments to the land use zoning objectives across the county. While the Office accepts and, indeed, welcomes many of these amendments as reasonable, if not positive, the Office has identified a significant number which are evidently inconsistent with the national and/or regional policy framework.

These zoning amendments are located in peripheral and often unserviced locations inconsistent with the compact and sustainable growth of the county, and in circumstances in which the draft Plan otherwise includes enough zoned land that is better located to accommodate the housing growth in the core strategy and the identified requirement for employment land. The planning authority's own Infrastructure Assessment, Settlement Capacity Audit, Strategic Environmental Assessment, and Strategic Flood Risk Assessment also identifies serious problems with many of these zoning amendments.

These zonings are subject of the majority of the MA Recommendations set out below.

In respect of the requirements of Recommendation 4 of the Office's submission to the draft Plan, concerning renewable energy. the Office considers the amended policy provisions to be sufficient, if not optimum. The planning authority should consider a minor amendment to PA-185, which amends section 33.11.1 Wind Energy Development, to omit the reference to the Draft Revised Wind Energy Guidelines 2019 as they have no statutory basis.

The Office welcomes the response of the planning authority to Recommendation 5 of the Office's submission to the draft Plan, flood risk management, which appropriately

(2022), the *Wind Energy Development Guidelines* (2006), and *The Planning System and Flood Risk Management Guidelines* (2009).

The planning authority is advised that section 12(10) of the Act provides the members of the planning authority with scope to make a further modification to a material alteration subject to the limitations set out in subsection 10(c) parts (i) and (ii).

Recommendations issued by the Office relate to clear breaches of the relevant legislative provisions, of the national or regional policy framework and/or of the policy of Government, as set out in the Ministerial guidelines under section 28. As such, the planning authority is required to implement or address recommendation(s) made by the Office in order to ensure consistency with the relevant policy and legislative provisions.

Observations take the form of a request for further information, justification on a particular matter, or clarification regarding particular provisions of a plan on issues that are required to ensure alignment with policy and legislative provisions. The planning authority is requested by the Office to action an observation.

A submission also can include advice on matters that the Office considers would contribute positively to the proper planning and sustainable development of the area. The planning authority is requested by the Office to give full consideration to the advice contained in a submission.

Overview

The Office acknowledges the significant work undertaken by Sligo County Council in preparing the material alterations to the draft Plan and in responding positively to the many issues raised by the Office through the recommendations and observations made in the Office's submission to the draft Plan.

In particular, the Office acknowledges the positive response of the planning authority to Recommendation 1 through the inclusion of revised housing targets in the core strategy to more closely align with the *Housing Supply Target Methodology Guidelines for Planning Authorities* (2021) and welcomes the allocation of the

addresses the concerns of the Office. However, several material amendments to land use zoning objectives entail the zoning of undeveloped lands within flood risk zone A/B, which lands have not passed the plan making justification test. This matter is addressed in an MA Recommendation 1, below.

Finally, the Office commends the planning authority for the clear and systematic formatting of the extensive material alterations to the draft Plan and, in particular, in providing a direct reference linkage to the Chief Executive's Report on submissions to the draft Plan. This enabled the Office to better understand the reasons of the planning authority in pursuing the subject amendments.

It is within this context the submission below sets out eight (8) recommendations under the following five themes:

Key theme	MA Recommendation	MA Observation
Zoning for residential use	MA Recommendation 1 MA Recommendation 2 MA Recommendation 3 MA Recommendation 4	-
Zoning for non-residential use	MA Recommendation 5	-
Access to national roads	MA Recommendation 6	-
Greenways and recreational infrastructure	MA Recommendation 7	-
Flood Risk Management	MA Recommendation 8	-

1. Zoning for residential use

1.1 Sligo Town – Regional Growth Centre

The Office welcomes the proposed amendments to the core strategy in response to Recommendation 1 of its submission to the draft Plan, which increase the housing target for the county and allocated this increase to Sligo as the Regional Growth Centre and one of the key drivers of growth in the northwest.

The Office notes that a large number of proposed additions to the new residential (nRES) zoning objectives for Sligo town are proposed as material amendments, notwithstanding that the chief executive determined that sufficient land was zoned in the draft Plan to accommodate the increased housing target. While many of these zoning amendments are well located in terms of proximity to services and facilities and infrastructure, the Office has identified a significant number of zoning amendments that are inconsistent with the national and regional policy framework to ensure that Sligo grows in a compact and sustainable manner, and are not required to ensure a sufficient supply of zoned land consistent with the core strategy of the draft Plan.

In respect of proposed material amendments to the zoning objectives for Sligo town, the Office notes that PAZ-9 and PAZ-13 which propose to remove new residential (nRES) land from the Strategic Land Reserve (SLR), PAZ-14 which proposes to zone land as nRES, and PAZ-15 which proposes to rezone land as nRES and include it in the SLR, are situated entirely outside the CSO Settlement Boundary. PAZ-11, which proposes to remove nRES land from the SLR, is almost entirely situated outside the said boundary, as is the majority of PAZ-12, which proposes new nRES land.

The subject material amendments are therefore inconsistent with NPO 3c. RPO 3.2(b) and RPO 3.7.39 compact growth. These peripheral and remote sites. which leapfrog extensive lands zoned nRES, land zoned SLR and Greenbelt lands in the draft Plan, do not have regard to the policy and objective to follow the sequential approach in zoning of land under section 6.2.3 of the *Development Plans, Guidelines for Planning Authorities* (2022) (the Development Plans Guidelines).

Furthermore, the peripheral locations of these lands mean that they do not facilitate the provision of housing in areas that facilitate active and sustainable modes of travel and do not, therefore, accord with mandatory objectives for sustainable settlement and transport strategies which promote measures to reduce greenhouse gas (GHG) emissions under section10(2)(n) of the Act, and will undermine the achievement of

mandatory targets for GHG emissions reduction under the *Climate Action and Low Carbon Development Act 2015*, as amended (the Climate Act).

The Infrastructural Assessment carried out by the planning authority has determined that the sites subject to PAZ-12. PAZ-14 and PAZ-15 are not serviced or serviceable. PAZ-11 has not been subject to an infrastructural assessment, but Uisce Éireann (UÉ) has confirmed that it is not currently serviced and that connection to water services would require a significant network extension. The proposed amendments are therefore inconsistent with NPO 72.

Further, while the planning authority determined that PAZ-9 and PAZ-13 are Tier 1 serviced land in terms of physical infrastructure, it also determined through a detailed Settlement Capacity Audit (SCA) that these lands ranked poorly relative to other zoned lands in terms of sequential development and accessibility. In failing to implement the findings of the SCA in respect of these sites the planning authority has not had regard to the policy and objective under section 6.2.1 of the Development Plans Guidelines.

Further, in the absence of a suitable evidence-base which demonstrates that the development of PAZ-14 would not compromise the capacity and efficiency of the adjacent the N4 / Western Distributor Road / Carragh Rd interchange, this material amendment does not have regard to section 2.7 of the *Spatial Planning and National Roads Guidelines for Planning Authorities* (2012) (National Roads Guidelines). PAZ-14 is therefore inconsistent with RPO 3.7.54 to strengthen connectivity to Dublin (N4) and with RPO 6.5 to maintain the strategic capacity and safety of the national road network in line with the NSO 2 of the NPF.

In addition, the Department of Housing, Local Government and Heritage has raised concern with respect to PAZ-11 and PAZ-12 which are situated in the Cairns Hill / Tonaphubble area, of an archaeological landscape containing Neolithic tombs, cairns and ringforts. These amendments may therefore be inconsistent with NPO 60 and RPO 5.14 to conserve built heritage.

The Office notes that the SEA Environmental Report identified PAZ-9, PAZ-11, PAZ-12, PAZ-13, PAZ-14 and PAZ-15 as having the potential to 'Probable Conflict with status of SEOs - unlikely to be fully mitigated'.

The Office also notes that the lands proposed to be zoned for residential use under PAZ 15 are located in an area at risk of flooding. This matter is separately addressed below under flood risk management.

MA Recommendation 1 - Zoning for residential use around Sligo Town

Having regard to the provision of new homes at locations that can support compact and sustainable development and the co-ordination of land use zoning, infrastructure and services, and in particular to:

- section 10(2)(n) of the *Planning and Development Act 2000*, as amended, concerning the promotion of sustainable settlement and transport strategies and associated mandatory targets for greenhouse gas emissions reduction targets under the *Climate Action and Low Carbon Development Act 2015*, as amended;
- the core strategy of the draft Sligo County Development Plan 2024-2030 (the draft Plan);
- NPO 3c, RPO 3.2(b) and RPO 3.7.39 compact growth;
- NPO 72a-c and associated NPF Appendix 3, tiered approach to zoning;
- the infrastructural assessment and settlement capacity audit in Appendix A of the draft Plan;
- the *Development Plans, Guidelines for Planning Authorities* (2022) in respect of the policy and objective under section 6.2.1 for zoning to be informed by the settlement capacity audit, and the policy and objective under section 6.2.3 to implement a sequential approach to zoning;
- NSO 2 and NPO 74 of the NPF, RPO 6.5 and RPO 3.7.54 of the RSES and the *Spatial Planning and National Roads Guidelines for Planning*

Authorities (2012) in respect of the zoning of land at national road interchanges or junctions;

- NPO 60 and RPO 5.14 to conserve built heritage; and
- the Strategic Environmental Assessment Addendum and the Strategic Flood Risk Assessment,

the planning authority is required to make the Plan without the following material amendments around Sligo town:

(i) PAZ-9,

(ii) PAZ-11,

(iii) PAZ-12,

(iv) PAZ-13,

(v) PAZ-14, and

(vi) PAZ-15.

1.2 Support towns

Extensive material amendments are also proposed to include additional nRES zonings, to remove nRES zonings from the SLR, and to include unjustified eRES zonings in Ballymote (seven), Enniscrone (ten) and Tobercurry (four). The Office has accepted the majority of proposed material amendments for the support towns.

Together with the lands zoned in the draft Plan, these zonings objectives and amendments provide sufficient zoned land to implement the core strategy in respect of the support towns in a compact and sustainable manner.

PAZ-20 (new nRES) and PAZ-23 (new nRES for inclusion in SLR) for Ballymote, PAZ-32, PAZ-33 and PAZ-35 (new nRES) for Enniscrone, and PAZ-37 (new eRES) for Tobercurry, are all situated outside, or almost entirely outside, the CSO Settlement Boundary[1] for the respective towns and are inconsistent with NPO 3c and

[1] As per endnote 17 of the National Planning Framework (Appendix 4, References).

RPO 3.3.

These sites, in addition to PAZ-21 (removes nRES from SLR) Ballymote and PAZ-31 Enniscrone (new nRES) are located in peripheral and/or remote locations, which leapfrog peripherally located land zoned nRES, SLR, and Greenbelt in the draft Plan, do not have regard to the policy and objective to follow the sequential approach in zoning of land under section 6.2.3 of the Development Plans Guidelines.

The planning authority's SCA also determined that the site subject of PAZ-21 scored comparatively lower than other sites in terms of sequential development and accessibility and determined. These sites do not therefore accord with mandatory objectives for sustainable settlement and transport strategies, as described above.

PAZ-20, PAZ-23, PAZ-31, PAZ-32, PAZ-33 and PAZ-37, in addition to PAZ-18 (new nRES), PAZ-20 (nRES) Ballymote and PAZ-39 (nRES) Tobbercurry were not subject to infrastructural assessment, and PAZ-35 was determined by the planning authority to be neither T1 nor T2 lands. The proposed material amendments are therefore inconsistent with NPO 72 and have not had regard to the policy and objective under section 6.2.1 of the the Development Plans Guidelines that zoning is informed by a settlement capacity audit.

The Office notes that the SEA Environmental Report identified PAZ-20, PAZ 21 PAZ-23, PAZ-31, PAZ-32, PAZ-33 and PAZ-35 and as having the potential to '*probably conflict with the status of Strategic Environmental Objectives (SEO's) – unlikely to be fully mitigated*'.

The Office also notes that the lands proposed to be zoned for residential use under PAZ 23 are located in an area at risk of flooding. This matter is separately addressed below under flood risk management.

MA Recommendation 2 - Zoning for residential use around Support Towns
Having regard to the provision of new homes at locations that can support compact and sustainable development and the co-ordination of land use zoning, infrastructure and services, and in particular to:

- section 10(2)(n) of the *Planning and Development Act 2000*, as amended, concerning the promotion of sustainable settlement and transport strategies and associated mandatory targets for greenhouse gas emissions reduction targets under the Climate Action and Low Carbon Development Act, 2015;
- the core strategy of the Draft Sligo County Development Plan 2024-2030 (the draft Plan) and NPO 18a to support the proportionate growth of rural towns;
- NPO 3c, RPO 3.2(b) and RPO 3.7.39 compact growth;
- NPO 72a-c and associated NPF Appendix 3, tiered approach to zoning;
- the infrastructural assessment and settlement capacity audit in Appendix A of the draft Plan;
- the *Development Plans, Guidelines for Planning Authorities* (2022) in respect of the policy and objective under section 6.2.1 for zoning to be informed by the settlement capacity audit, and the policy and objective under section 6.2.3 to implement a sequential approach to zoning; and
- the Strategic Environmental Assessment Addendum,

the planning authority is required to make the Plan without the following material amendments to the Support Towns:

(i) Ballymote - PAZ-18, PAZ-20, PAZ 21 and PAZ-23

(ii) Enniscrone - PAZ-31, PAZ-32, PAZ-33 and PAZ-35

(iii) Tobercurry - PAZ-37 and PAZ-39.

1.3 Satellite Villages and Villages with Special Tourism Functions

Extensive material amendments are also proposed to include additional new residential (nRES) zonings, including to the settlements of Ballysadare, Strandhill and Easky. The Office accepts the proposed material amendments to many of the Satellite Villages as reasonable.

Together with the lands zoned in the draft Plan, these zonings objectives and amendments provide sufficient zoned land to implement the core strategy in respect of Ballysadare, Strandhill and Easky in a compact and sustainable manner.

Ballysadare

PAZ-45 (nRES) is situated outside the CSO Settlement Boundary for the Balysadare inconsistent with NPO 3c and RPO 3.3. This site location is peripheral and does not have regard to the policy and objective for the sequential approach to zoning under section 6.2.3 of the Development Plans Guidelines and does not accord with mandatory objectives for sustainable settlement and transport strategies, as described above.

PAZ-42, PAZ-43, PAZ-45 were not subject to infrastructural assessment. UÉ states that PAZ-45 would require a significant network extension to connect to wastewater services. The proposed amendments are therefore inconsistent with NPO 72 and have not had regard to the policy and objective under section 6.2.1 of the Development Plans Guidelines that zoning is informed by a settlement capacity audit.

However, the Office also notes PAZ-46 which proposes to include an nRES zoning within the SLR. In contrast to the other material amendments, this site is consistent with compact growth and the tiered approach to zoning and has regard to the policy and objective of the Development Plans Guidelines for sequential zoning and for settlement capacity audit.

Strandhill

PAZ-56, PAZ-57 and most of PAZ-58 (nRES) are situated outside the CSO Settlement Boundary for Strandhill and are inconsistent with NPO 3c and RPO 3.3. This sites are in peripheral locations and do not have regard to the policy and objective for the sequential approach to zoning under section 6.2.3 of the Development Plans Guidelines and do not accord with the mandatory objectives for sustainable settlement and transport strategies, as described above.


Strandhill

PAZ-56 was not subject to infrastructural assessment, and UÉ states that it would require significant network extension to connect to wastewater services. Although PAZ-57 and PAZ-58 were found to be T1 land in an infrastructural assessment, the planning authority's SCA determined that these lands should be SLR due to their lower accessibility ranking. The proposed amendments are therefore inconsistent with NPO 72 and have not had regard to the policy and objective under section 6.2.1 of the Development Plans Guidelines that zoning is informed by a settlement capacity audit.

Easky

The Office has significant concerns that the scale of the additional nRES zoning provided by PAZ-60, at almost 4ha, is disproportionate, and excessive in view of the core strategy target for this small village. In contrast PAZ-61 would omit an existing nRES site of 0.31ha.

PAZ-60 is situated outside the CSO Settlement Boundary for the settlement and is inconsistent with NPO 3c and RPO 3.3. This site is in peripheral location and does not have regard to the policy and objective for the sequential approach to zoning under section 6.2.3 of the Development Plans Guidelines and do not accord with mandatory objectives for sustainable settlement and transport strategies, as described above.

PAZ-60 was found in the infrastructural assessment to be neither T1 nor T2 land. The proposed amendment is therefore inconsistent with NPO 72 and has not had regard to the policy and objective under section 6.2.1 of the Development Plans Guidelines that zoning is informed by a settlement capacity audit.

In contrast, PAZ-61 is located adjacent the core of the town, is brownfield in character and is therefore consistent with national and regional policy objectives for compact growth and regeneration, and has regard to sequential zoning. The site was determined as appropriate through an infrastructural assessment and SCA, and had regard to the policy and objective under section 6.2.1 of the Development Plans Guidelines.


Strandhill

In respect of the three subject settlements, the Office notes that the SEA Environmental Report identified PAZ-42, PAZ-43, PAZ-44, PAZ-45, PAZ-46, PAZ-56, PAZ-57, PAZ-58 and PAZ-60 as having the potential to *'Probable Conflict with status of SEOs - unlikely to be fully mitigated'.*

MA Recommendation 3 - Zoning for residential use around SatelliteVillages and Villages with Special Tourism Functions

Having regard to the provision of new homes at locations that can support compact and sustainable development and the co-ordination of land use zoning, infrastructure and services, and in particular to:

- section 10(2)(n) of the *Planning and Development Act 2000*, as amended, concerning the promotion of sustainable settlement and transport strategies and associated mandatory targets for greenhouse gas emissions reduction targets under the *Climate Action and Low Carbon Development Act 2015*, as amended;
- the core strategy of the draft Sligo County Development Plan 2024-2030 (the draft Plan);
- NPO 3c and RPO 3.3 compact growth;
- NPO 72a-c and associated NPF Appendix 3, tiered approach to zoning;
- the infrastructural assessment and settlement capacity audit in Appendix A of the draft Plan;
- the *Development Plans, Guidelines for Planning Authorities* (2022) in respect of the policy and objective under section 6.2.1 for zoning to be informed by the settlement capacity audit, and the policy and objective under section 6.2.3 to implement a sequential approach to zoning; and
- the Strategic Environmental Assessment Addendum,


Strandhill

the planning authority is required to make the Plan without the following material amendments to:

(i) Satellite villages

a) Ballysadare – PAZ-42, PAZ-43, PAZ-45 and PAZ-46

b) Strandhill – PAZ-56, PAZ-57 and PAZ-58

(ii) Villages with special tourism functions

a) Easky – PAZ-60 and PAZ-61.

1.4 Other Villages

Extensive material amendments are also proposed to include additional Rural Village (RV) zonings, including in the settlements of Ballintogher, Castlebaldwin, Cliffony, Curry and Gorteen.

PAZ-64 Ballintogher, PAZ-73 Cliffony are situated outside the CSO Settlement Boundary. Although the CSO Settlement Boundary has not been defined for Castlebalwin or Curry, PAZ-68 Castlebawn and PAZ-76 Curry are situated in peripheral locations outside the Development Limit defined in the draft Plan. The four sites are therefore considered inconsistent with NPO 3c and RPO 3.3.

While PAZ-79 and PAZ-80 Gorteen are within the CSO Settlement Boundary, these sites, in addition to PAZ-64, PAZ-73, PAZ68 and PAZ-76 do not have regard to the policy and objective for the sequential approach to zoning under section 6.2.3 of the Development Plans Guidelines and do not accord with the mandatory objectives for sustainable settlement and transport strategies, as described above.

PAZ-64, PAZ-68, PAZ-73, PAZ-76 and PAZ-79 also were not subject to infrastructural assessment. PAZ-80 was subject of an infrastructural assessment and found to be neither T1 nor T2 lands. The proposed amendments are therefore inconsistent with NPO 72 and have not had regard to the policy and objective under


OPR Strandhill

authority as neither T1 nor T2 lands and would require a 730m network extension to connect to the wastewater system according to UÉ, and therefore the subject zoning is inconsistent with NPO 72 and does not have regard to the policy and objective for zoning to be informed by the settlement capacity assessment under section 6.2.1 of the Development Plans Guidelines.

PAZ-41 and PAZ-44 propose to zone over 5ha Green Belt lands for Business / Industry / Enterprise (BIE) outside Ballysadare. PAZ-46 proposes to place 4.11ha of BIE in Ballysadare into the Strategic Land Reserve (SLR). Unlike the lands subject of PAZ-46, the sites of PAZ-41 and PAZ-44 are located outside the CSO Settlement Boundary and will not support the achievement of NSO compact growth and are non-sequential zonings that do not have regard to the sequential test for enterprise and employment land under the Development Plans Guidelines (Appendix A). The two sites are also situated outside the defined Development Limit and access onto the public road within the 80kph speed limit. Unlike the lands subject of PAZ-46, the sites of PAZ-41 and PAZ-44 have been determined by the planning authority as neither T1 nor T2 lands and, according to UÉ, access to wastewater may necessitate a 900m network extension. The subject amendments are therefore inconsistent with NPO 72 and do not have regard to the policy and objective for zoning to be informed by the settlement capacity assessment under section 6.2.1 of the Development Plans Guidelines

PAZ-59 proposes to change 1.15ha of GB land to BIE, and PAZ-62 proposes to change 1.2ha of GB land to TOU around Easky.

The lands subject of PAZ-59 are consistent with compact growth and the sequential approach, being adjacent the village core, and have been determined by the planning authority as T1 lands. These lands are therefore well located to provide for employment uses in a sustainable, compact, and well-planned way.

Conversely, the lands subject of PAZ-62 are remote from the CSO boundary and the defined Development Limit for Easky and will not support the achievement of NSO compact growth and are non-sequential zonings that do not have regard to the sequential approach under the Development Plans Guidelines. The said lands have

Guidelines for Planning Authorities (2024) in respect of the policy and objective under table 3.7 that development is tailored to the scale, form and character of the settlement and the capacity of services and infrastructure;

- NPO 3c, RPO 3.2(b) and RPO 3.7.39 compact growth;
- NPO 72a-c and associated NPF Appendix 3, tiered approach to zoning;
- the infrastructural assessment and settlement capacity audit in Appendix A of the Draft Sligo County Development Plan 2023-2029;
- the *Development Plans, Guidelines for Planning Authorities* (2022) in respect of the policy and objective under section 6.2.1 for zoning to be informed by the settlement capacity audit, and the policy and objective under section 6.2.3 to implement a sequential approach to zoning; and
- the Strategic Environmental Assessment Addendum and the Strategic Flood Risk Assessment,

the planning authority is required to make the Plan without the following material amendments:

(i) Ballintogher - PAZ-64

(ii) Castlebaldwin – PAZ-68

(iii) Cliffony – PAZ-73

(iv) Curry- PAZ-76

(v) Gorteen – PAZ-79 and PAZ-80.

2. Zoning for non-residential uses

The Office welcomes the inclusion, under PA-27, of an additional text to section 7.3 Spatial Planning for Economic Development, which explains the simple, evidence-based approach applied by the planning authority to determine that 25.2ha of Business / Industry / Enterprise (BIE) zoned land is needed for the entire county to

accommodate 60% of projected employment demand over the plan period. It is apparent that 40% of future employment would be accommodated on other zoned lands, including town centre uses (TC1). mixed uses (MIX), tourism (TOU) and community facilities (CF), among others.

The text clarifies that as the draft Plan zones 290ha for BIE, most of which are located strategically within the Regional Growth Centre, the draft Plan is capable of supporting far in excess of the projected employment growth. Notwithstanding, the material alterations to the draft Plan include a number of proposed amendments to the zoning of BIE lands and other non-residential lands with potential to accommodate employment uses.

PAZ-10 proposes to zone an additional c.2ha as BIE, in the unzoned area outside Sligo town. This remote site is c.1.2km outside the CSO Settlement Boundary and would be inconsistent with RPO 3.7.39 compact growth for employment, would not support the achievement of the NSO compact growth, does not apply the sequential approach to zoning and therefore does not have regard to the sequential test for enterprise and employment land under the Development Plans Guidelines (Appendix A).

Furthermore, the peripheral location of this site means that it cannot facilitate access by active and sustainable modes of travel and does not therefore accord with mandatory objectives for sustainable settlement and transport strategies which promote measures to reduce GHG emissions under section10(2)(n) of the Act, and will undermine the achievement of mandatory targets for GHG emissions reduction under the Climate Act, as supported by the *Climate Action Plan 2024* and by the goals of the *National Sustainable Mobility Policy* (2022).

PAZ-34, which proposes to change the zoning of 3.6ha land, located outside the 2016 settlement boundary and the Development Limit for Enniscrone, from Greenbelt (GB) to Tourism (TOU), would not support the achievement of the NSO compact growth. This site does not represent sequential zoning and does not have regard to sequential test for enterprise and employment land under the Development Plans Guidelines (Appendix A). These lands have been determined by the planning

authority as neither T1 nor T2 lands and would require a 730m network extension to connect to the wastewater system according to UÉ, and therefore the subject zoning is inconsistent with NPO 72 and does not have regard to the policy and objective for zoning to be informed by the settlement capacity assessment under section 6.2.1 of the Development Plans Guidelines.

PAZ-41 and PAZ-44 propose to zone over 5ha Green Belt lands for Business / Industry / Enterprise (BIE) outside Ballysadare. PAZ-46 proposes to place 4.11ha of BIE in Ballysadare into the Strategic Land Reserve (SLR). Unlike the lands subject of PAZ-46, the sites of PAZ-41 and PAZ-44 are located outside the CSO Settlement Boundary and will not support the achievement of NSO compact growth and are non-sequential zonings that do not have regard to the sequential test for enterprise and employment land under the Development Plans Guidelines (Appendix A). The two sites are also situated outside the defined Development Limit and access onto the public road within the 80kph speed limit. Unlike the lands subject of PAZ-46, the sites of PAZ-41 and PAZ-44 have been determined by the planning authority as neither T1 nor T2 lands and, according to UÉ, access to wastewater may necessitate a 900m network extension. The subject amendments are therefore inconsistent with NPO 72 and do not have regard to the policy and objective for zoning to be informed by the settlement capacity assessment under section 6.2.1 of the Development Plans Guidelines

PAZ-59 proposes to change 1.15ha of GB land to BIE, and PAZ-62 proposes to change 1.2ha of GB land to TOU around Easky.

The lands subject of PAZ-59 are consistent with compact growth and the sequential approach, being adjacent the village core, and have been determined by the planning authority as T1 lands. These lands are therefore well located to provide for employment uses in a sustainable, compact, and well-planned way.

Conversely, the lands subject of PAZ-62 are remote from the CSO boundary and the defined Development Limit for Easky and will not support the achievement of NSO compact growth and are non-sequential zonings that do not have regard to the sequential approach under the Development Plans Guidelines. The said lands have

not been subject of an infrastructural assessment or settlement capacity audit and, according to UÉ, would require a 500m network extension to connect to the WWTP. The subject amendment is therefore inconsistent with NPO 72 and does not have regard to the policy and objective for zoning to be informed by the settlement capacity assessment under section 6.2.1 of the Development Plans Guidelines.

There is, therefore, no evident planning reason for replacing the lands the subject of PAZ 59 with PAZ 62.

MA PAZ-81 proposes to change the zoning of 1.3ha of GB to Community Facilities (CF) around Monasteraden. The CSO Settlement Boundary has not been defined, but the lands are outside the defined Development Limit and mostly outside the village plan limit. The proposed amendment would therefore not support the NSO compact growth and would not have regard to the sequential approach under the Development Plans Guidelines. The site has not been subject of an infrastructure assessment or SCA and UÉ states that it would require pipe upsizing for connection. The amendment is inconsistent with NPO 72 and does not have regard to the policy and objective under s.6.2.1 of the Development Plans Guidelines.

The SEA ER identifies PAZ-10, PAZ-34, PAZ-41, PAZ-44, PAZ-46, PAZ-62 and PAZ-81 as having the potential for *'Probable Conflict with status of SEOs - unlikely to be fully mitigated'* (See Table 8.7 of SEA ER).

The Office also notes that the lands proposed to be zoned under PAZ-34 Enniscrone and PAZ-62 Easky are located in an area at risk of flooding. This matter is separately addressed below under flood risk management.

MA Recommendation 5 – Non-residential zonings

Having regard to the provision of employment at locations that can support compact and sustainable development and the co-ordination of land use zoning, infrastructure and services, and in particular to:

- section 10(2)(n) of the *Planning and Development Act 2000*, as amended, concerning the promotion of sustainable settlement and transport strategies

and associated mandatory targets for greenhouse gas emissions reduction targets under the Climate Action and Low Carbon Development Act, 2015;

- RPO 3.7.39 compact growth for employment for Sligo Regional Growth Centre
- NPO 74 and the National Sustainable Outcome and Regional Growth Ambition for compact growth;
- NPO 72a-c and associated NPF Appendix 3, tiered approach to zoning;
- the infrastructural assessment and settlement capacity audit in Appendix A of the Draft Sligo County Development Plan 2023-2029;
- the *Development Plans, Guidelines for Planning Authorities* (2022) in respect of the policy and objective under section 6.2.1 for zoning to be informed by the settlement capacity audit, and the provisions for the sequential approach to zoning; and
- the Strategic Environmental Assessment Addendum and the Strategic Flood Risk Assessment.

the planning authority is required to make the Plan without the following material amendments to:

(i) Sligo town – PAZ-10

(ii) Enniscrone – PAZ-34

(iii) Ballysadare – PAZ-41, PAZ-44 and PAZ-46

(iv) Easky – PAZ-59 and PAZ-62

(v) Monasteraden – PAZ-81.

3. Access to national roads

Proposed amendment PA-180 proposes to include text into the Plan which states:

> *Where direct vehicular access onto national primary roads cannot be avoided, a Departure from TII Publications Standards DN-GEO-03060 with justification shall be required.*

This provision is not, however, consistent with national and regional policy to maintain the strategic capacity and safety of the national roads network, particularly inter-urban roads between Sligo and other cities and regional growth centres as part of enhanced regional accessibility in accordance with NSO 2 of the NPF, RPO 6.5 of the RSES, and the section 28 ministerial guidelines for National Roads Guidelines.

A key message of the National Roads Guidelines is that:

> *Development plans must include policies which seek to maintain and protect the safety, capacity and efficiency of national roads and associated junctions, avoiding the creation of new accesses and the intensification of existing accesses to national roads where a speed limit greater than 50 kmh applies.*

Section 2.5 of these guidelines outlines that the policy of the planning authority will be to avoid the creation of any additional access point from new development or the generation of increased traffic from existing accesses to national roads to which speed limits greater than 60 kmh apply.

PA-180 is not consistent with this policy framework to avoid direct vehicular access onto national primary roads.

Furthermore, the proposed amendment does not fall under the exceptional circumstances to these provisions under with section 2.6 of the National Roads Guidelines.

MA Recommendation 6 - Access to National Roads

Having regard to the need to maintain the capacity and safety of the strategic road network and, in particular:

- NPO 74 to align the NPF with the NDP through the delivery of the national strategic outcomes;
- NSO 2 and RPO 6.5, concerning maintaining the strategic capacity and safety of the national roads network; and
- sections 2.5 and 2.6 of the *Spatial Planning and National Roads Guidelines for Planning Authorities* (2012), in respect of the require policy approach for access to national roads,

the planning authority is required to make the Plan without MA PA-180.

4. Greenways and recreational infrastructure

The NPF includes NPO 22 to facilitate the development of greenways and blueways, and NPO 60 to conserve and enhance natural heritage.

The Office notes that two material amendments are proposed in respect of the routing of greenways, PA-105 and PA-106.

MA PA-106 introduces policy P-OR-23 which states:

> *Ensure that the routing/location, siting and design of proposed outdoor recreational infrastructure (greenways, walking and cycling paths/trails, parks and other open spaces) does not have a significant adverse impact on biodiversity.*

This policy provides a clear and appropriate basis to protect biodiversity and allow individual proposals to be assessed against through the development management process in a manner which is consistent with both NPO 22 (greenways) and NPO 60 (natural heritage).

MA PA-105 however induces text at section 27.7.4 stating that '*greenways should not be routed through areas of high nature value*', which has the potential to conflict with that policy resulting in a lack of clarity and transparency. Furthermore, '*areas of high nature value*' do not appear to be defined or otherwise referenced in the draft Plan.

The Office is of the view therefore, that PA-105 is inconsistent with NPO 22 to facilitate greenways, and NPO 60 the protection of natural heritage in a manner appropriate to its significance.

MA Recommendation 7 - Greenways
Having regard to NPO 22 to facilitate greenways, and NPO 60 to conserve and enhance natural heritage in a manner appropriate to its significance, the planning authority is required to make the plan without material amendment PA-105.

5. Flood risk management

In general, the Office welcomes the response of the planning authority to its recommendation on flood risk management issues, however the material alterations to the draft Plan include a significant number of amendments relating to the zoning of land for uses vulnerable to flooding, which sites have not passed the plan making justification test. These include: PAZ-15 Sligo town; PAZ-18, PAZ-19 and PAZ-23 Ballymote; PAZ-23 Enniscrone; PAZ-62 Easky; PAZ-63 Ballinafad; PAZ-76 Curry; PAZ-79 and PAZ-80 Gorteen; several of which are addressed under other recommendations. above.

It is noted that the decision of the planning authority to include the zoning of these lands is that '*the land use zoning objective reflects the existing use of the site*'. However, this is not appropriate where the lands concerned are undeveloped lands.

Any undeveloped lands in Flood Zone A should be zoned for water compatible development, and in Flood Zone B for less vulnerable usage, unless all criteria of the Plan Making Justification Test can be satisfied. The subject amendments are

therefore inconsistent with NPO 57 and RPO 3.1, and have not had regard to the Flood Guidelines.

MA Recommendation 8 - Flood risk management

Having regard to the need to manage flood risk and, in particular:

- NPO 57 and RPO 3.10 to ensure flood risk management avoids inappropriate development at risk of flooding;
- the provisions of *The Planning System and Flood Risk Management for Planning Authorities* (2009), including the plan making justification test; and
- the Strategic Flood Risk Assessment,

the planning authority is required to make the Plan without:

(i) Sligo town - PAZ-15;

(ii) Ballymote - PAZ-18, PAZ-19 and PAZ-23;

(iii) Enniscrone - PAZ-23;

(iv) Easky - PAZ-62;

(v) Ballinafad - PAZ-63;

(vi) Curry - PAZ-76; and

(vii) Gorteen - PAZ-79 and PAZ-80.

Summary

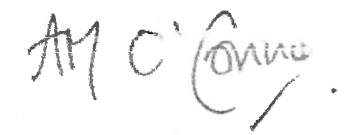
The Office requests that your authority addresses the recommendations outlined above. As you are aware, the report of the chief executive of your authority prepared for the elected members under section 12 of the Act must summarise these recommendations and the manner in which they will be addressed.

At the end of the process, your authority is required to notify this Office **within five working days** of the decision of the planning authority in relation to the material

alterations to the draft Plan. Where your authority decides not to comply with the recommendations of the Office, or otherwise makes the Plan in such a manner as to be inconsistent with the recommendations of the Office, the chief executive must inform the Office accordingly and state the reasons for the decision of the planning authority.

Please feel free to contact the staff of the Office in the context of your authority's responses to the above, which we would be happy to facilitate. Contact can be initiated through plans@opr.ie.

Yours sincerely,



Anne Marie O'Connor
Deputy Regulator and Director of Plans Evaluations

Gmail

Ann McKirdy <ainenicamhlaidh@gmail.com>

Information for Members on the requirement for an Appropriate Assessment for the Proposed Path across the SAC

3 messages

Ann McKirdy <ainenicamhlaidh@gmail.com> Fri, Jul 9, 2021 at 11:38 PM
To: helen.mccauley@outlook.com

Hi Helen,
I hope you are well. I spoke with Sinead Maguire today and I voiced my concern for the impact the proposed path would have on the dunes. This development would require an appropriate assessment. Sinead asked me to send the information to you and asked you to kindly distribute to the group so we can discuss at the next meeting. Many thanks!

I have your lovely flowers on my kitchen window! Just fab!
Kind regards,
Ann

Biodiversity Group Strandhill SAC Information .docx
1022K

Helen McCauley <helen.mccauley@outlook.com> Sat, Jul 10, 2021 at 8:15 AM
To: Ann McKirdy <ainenicamhlaidh@gmail.com>

Thank you Ann will send that out today.

Delighted you are enjoying the flowers.

Best regards

Helen

Get Outlook for iOS

From: Ann McKirdy <ainenicamhlaidh@gmail.com>
Sent: Friday, July 9, 2021 11:38:26 PM
To: helen.mccauley@outlook.com <helen.mccauley@outlook.com>
Subject: Information for Members on the requirement for an Appropriate Assessment for the Proposed Path across the SAC

[Quoted text hidden]

Ann McKirdy <ainenicamhlaidh@gmail.com> Fri, Mar 20, 2026 at 8:07 AM
To: Ann McKirdy <ainenicamhlaidh@gmail.com>

---------- Forwarded message ---------
From: **Ann McKirdy** <ainenicamhlaidh@gmail.com>
Date: Fri, 9 Jul 2021 at 23:38
Subject: Information for Members on the requirement for an Appropriate Assessment for the Proposed Path across the SAC
To: <helen.mccauley@outlook.com>
[Quoted text hidden]

Biodiversity Group Strandhill SAC Information .docx
1022K

Additional 2021
Path Planned
& Funding Secured
I sought the AA's
which thwarted
these going ahead

My Research for Biodiversity Group
New Proposed Path through Woods

This research is to inform the members of the Biodiversity Group regarding the legal requirement of an appropriate assessment for the proposed new path across the SAC by the Airport to facilitate vehicular parking and pedestrian access to Killaspugbrone Beach and the looped trail.

The Strandhill Dunes are classed as a Annex I of the EU Habitats Directive (92/43/EEC). I have attached the specifics on Planning Law and the Conservation Objectives for the SAC. Development on this SAC requires an Appropriate Assessment.

I have also attached a map which denotes the SAC, SPA and National Heritage area affected, the colours are superimposed on the site to highlight the SAC.

Cases where no Appropriate Assessment issues arise:

Per the **Office of the Planning Regulator, Practice Note PN01**: Appropriate Assessment Screening for Development: where the nature, scale, timing, duration and location of a development is entirely unconnected to a European site. These instances will generally be *very small developments, for example, signage or house extensions in serviced urban areas and small developments in urban areas/rural areas with no connections to ecological receptors linked to European sites*. Nonetheless, this consideration still involves the planner providing a reasoned determination in the planner's report to show that the matter has been considered.

The project should only be considered to have no appropriate assessment issues if it is obvious that the entire project, through all of its stages, could not possibly have any effect on any European site, and that no measures intended to avoid or reduce potentially harmful effects on a European site are included.

Strandhill sand dune system is contained within two SACs: Cummeen Strand/Drumcliff Bay SAC (627) and Ballysadare Bay SAC (622).

Mr. Bassett for Bradbeath Comp.
Mon. Proposed Path. Thursday 1st week

In Ireland, there are nine sand dune habitats (including annual vegetation of drift lines) listed under **Annex I of the EU Habitats Directive (92/43/EEC)** (* denotes a priority habitat): Annual vegetation of drift lines (1210) Embryonic shifting dunes (2110) Shifting dunes along the shoreline with Ammophila arenaria (2120) Fixed coastal dunes with herbaceous vegetation (grey dunes) (2130) *

The EU Annex I sand dune habitats recorded at Strandhill include, Fixed dunes, Dune slack, Dunes with Salix repens, Mobile dunes, Embryonic dunes, Perennial vegetation of stony banks and Annual vegetation of driftlines.

The dunes at Strandhill in particular are important as they support a population of the Annex II species Vertigo angustior. A species listed on the Flora (Protection) Order 1999 - round leaved wintergreen (Pyrola rotundifolia) has also been recently recorded from the site (K. Gaynor, pers. comm.).

1 Overall objectives The overall objective for 'Embryonic shifting dunes' in Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC is to **'maintain the favourable conservation condition'.**

2 The overall objective for 'Shifting dunes along the shoreline with Ammophila arenaria' in Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC is to **'restore the favourable conservation condition'.**

3 The overall objective for 'Fixed coastal dunes with herbaceous vegetation' in Cummeen Strand/ Drumcliff Bay (Sligo Bay) SAC is to **'restore the favourable conservation condition'**. These objectives are based on an assessment of the recorded condition of each habitat under a range of attributes and targets. The assessment is divided into three main headings (a) Area (b) Range and (c) Structure and Functions.

At the Strandhill sub-site the extent of mobile dunes is considered unfavourable-inadequate owing to the impacts of natural erosion which is **compounded in places by human disturbance mainly from trampling.** Mobile dunes are almost absent from the northern section of the site where fixed dunes are fronted by a steep eroding ridge (Ryle et al., 2009).

APPROPRIATE ASSESSMENT

Appropriate assessment comes from the Habitats Directive (92/43/EEC), which seeks to safeguard the long-term survival of Europe's most valuable and threatened species and habitats.

The geographical areas of particular importance to these species and habitats have been selected as Special Areas of Conservation (SAC) and Special Protection Areas (SPA) which are collectively referred to (in Ireland) as European sites.

Together, these sites comprise the pan-European Natura 2000 network of protected areas.

One of the measures which protects these areas is the requirement that **every project** must undergo an assessment of its implications for any European site **before consent for the project is given.**

Consent for the project can only be given after determining that it will not adversely affect the integrity of the site(s) concerned in view of the conservation objectives of that site.

In order to determine if an appropriate assessment is required, a screening process must be carried out for all applications for planning permission. The Habitats Directive (92/43/EEC) and the associated Birds Directive (2009/147/EC) are transposed into Irish legislation by Part XAB of the 2000 Act and the Birds and Natural Habitats Regulations 2011.

The legislative provisions for appropriate assessment screening for planning applications are set out in Section 177U of the 2000 Act.

Is the project likely to have a significant effect, either individually or in combination with other plans or projects, on European site(s) in view of the site's conservation objectives?

DECISION AND REASON RECORDED

The screening determination must be based on scientific information relevant to the likely effects on the conservation objectives of the relevant European sites. The information should be up-to-date and based on the best available techniques and methods to estimate the presence and extent of effects.

This is because if there is any scientific uncertainty as to the absence of significant effects, the project must be screened in for appropriate assessment.

Direct and Indirect Effects 5 Holohan v ABP (Kilkenny Road case) CJEU C-461/17.

The effects of a project may include direct or indirect effects on a European Site. Indirect effects can occur where further development is associated with a proposed development and it is this secondary element that is a risk factor to a site.

There may be indirect impacts to European sites via impacts to non -interest habitats within a site or such habitats outside a site, or via impacts to species for which a site has been designated beyond the site where this might affect the conservation objectives of the site. This is particularly relevant in relation to SPAs where areas outside the European site are often important for bird species.

Likely to have a Significant Effect The triggers for appropriate assessment are based on a 'likelihood' (read as 'possibility') of a potential significant effect occurring and not on certainty. This test is based on the precautionary principle.

Mitigation measures intended to avoid or reduce impacts to European sites are commonly referred to as 'mitigation measures'. Any measure or feature of the development that is wholly or partially included in order to avoid or reduce impacts to European sites **cannot** be considered for the purposes of screening out the need for appropriate assessment.

The precautionary principle means that where the most reliable information available leaves obvious doubt as to the absence of significant effects, the project cannot be screened out and an appropriate assessment must be carried out.

Significant Effect Significant effects relate to the conservation objectives for the European site. If a project is likely to undermine any of the site's conservation objectives, it must be considered likely to have a significant effect on that site. This will depend on factors such as the type, extent, duration, intensity, timing, probability, and in-combination effects of the potential impact, as well as the vulnerability of the habitats and species concerned.

Source-Pathway-Receptor Consideration of likely significant effects should be based on the S-P-R risk assessment principle. If there is no ecological pathway or functional link between the proposed development and the European site, there is no potential for impact and the project can be screened out. Ecological pathways can be physical, for example, water or air in the case or airborne pollutants (e.g. ammonia from intensive agricultural installations). Functional pathways occur, for example, where the application site is used as foraging for a Qualifying Interest of a SAC or SPA. Section 3.0 includes further details on this concept.

Zone of Influence The zone of influence of a proposed development is the geographical area over which it could affect the receiving environment in a way that could have significant effects on the Qualifying Interests of a European site.

FURTHER INFORMATION ON THE CONSERVATION OBJECTIVES FOR STRANDHILL DUNES PER THE NPWS REPORT 2013

Achieving Favourable Conservation Status (FCS) is the overall objective to be reached for all Annex I habitat types and Annex II species of European Community interest listed in the Habitats Directive 92/43/EEC (Commission of the European Communities, 2007). It is defined in positive terms, such that a habitat type or species must be prospering and have good prospects of continuing to do so. *Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC is a large coastal site, extending from Cullamore in the north-west to Killaspug in the south-west, and from Sligo town in the southeast to Drumcliff village in the north-east.* It includes two

large shallow bays, Drumcliff Bay and Sligo Harbour. The site is largely underlain by carboniferous limestone, but acidic rocks are also found on the Rosses Point peninsula. This large site supports an impressive range of habitats, including woodland, saltmarsh, sandy beaches, boulder beaches, shingle, fen, freshwater marshes, rocky sea cliffs and lakes. *The site also supports important populations of waterfowl and seabirds and overlaps with two separate Special Protection Areas: Drumcliff Bay SPA 4013 and Cummeen Strand SPA 4035).*

It also supports a number of rare species, including Annex II snail species Vertigo angustrior and the nationally protected round-leaved wintergreen (Pyrola rotundifolia). Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC (site code: 627) is designated for a range of coastal habitats, particularly sand dunes.

The following three coastal habitats are included in the qualifying interests for the site (* denotes a priority habitat): ***Embryonic shifting dunes (2110) Shifting dunes along the shoreline with Ammophila arenaria (white dunes) (2120) Fixed coastal dunes with herbaceous vegetation (grey dunes) (2130)**** These three habitats are all associated with sand dune systems and are found in close association with each other.

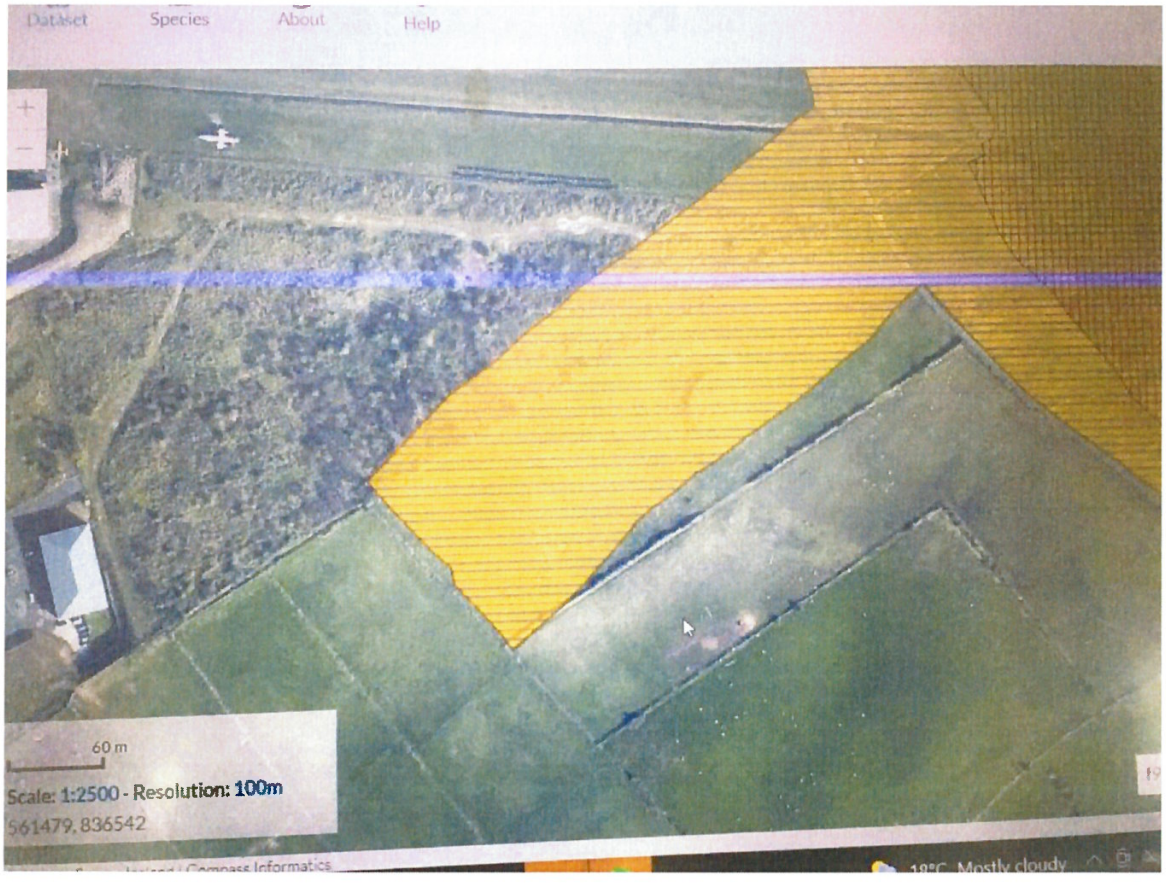
Other Annex I coastal habitats (Salicornia flats, ASM, MSM, vegetated shingle, annual vegetation of driftlines, dunes with Salix repens, humid dune slacks) were also recorded site by the Coastal Monitoring Project (CMP) (Ryle et al., 2009), Saltmarsh Monitoring Project (SMP) (McCorry & Ryle 2009) and the National Shingle Beach Survey (NSBS) (Moore & Wilson, 1999), but these are not listed as qualifying interest for the site.

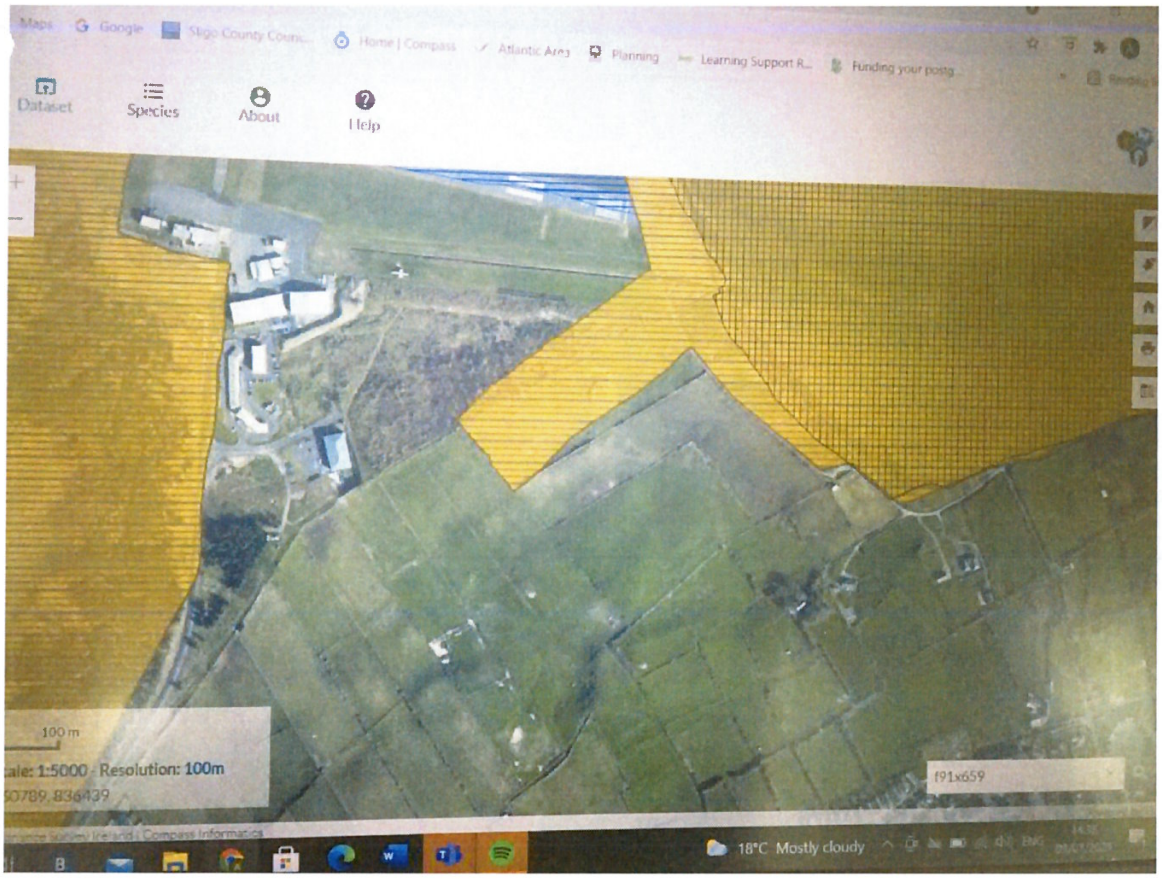
The targets set for the sand dune habitats are based primarily on the results of the Coastal Monitoring Project (CMP) (Ryle et al., 2009) .The CMP surveyed the following four sub-sites within Cumeeen Strand/Drumcliff Bay (Sligo Bay) SAC (Ryle et al., 2009): 1. Strandhill 2. Coney Island 3. Rosses Point 4. Yellow Strand

The distribution of sand dune habitats within Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC is presented in Appendix I. As part of the Coastal Monitoring Project (CMP) detailed individual reports and habitat maps were produced for each sub-site and these are included in a set of Appendices to this document (Appendices II to V). Strandhill sand dune system is contained within two SACs: Cummeen Strand/Drumcliff Bay SAC (627) and Ballysadare Bay SAC (622). This document deals with the northern section of Strandhill dune system, which

is contained within Cummeen Strand/Drumcliff Bay SAC. This northern part of Strandhill also contains an airport, a sewage treatment plant and a low density plantation on fixed dunes. ***The EU Annex I sand dune habitats recorded at Strandhill by the CMP include, Fixed dunes, Dune slack, Dunes with Salix repens, Mobile dunes, Embryonic dunes, Perennial vegetation of stony banks and Annual vegetation of driftlines.***

The dunes at Strandhill in particular are important as they support a population of the Annex II species Vertigo angustior. A species listed on the Flora (Protection) Order 1999 - roundleaved wintergreen (Pyrola rotundifolia) has also been recently recorded from the site (K. Gaynor, pers. comm.).




Maps
Google
Sligo County Counc...
Home | Compass
Atlantic Area
Planning
Learning Support R...
Funding your postg...
Dataset
Species
About
Help
100 m
ale: 1:5000 - Resolution: 100m
f91x659
18°C Mostly cloudy

Gmail

Ann McKirdy <ainenicamhlaidh@gmail.com>

Dune destruction every minute of the summer

2 messages

Sledding on Dunes

Ann McKirdy <ainenicamhlaidh@gmail.com>
To: sinead maguire <sineadmaguire@yahoo.com>

Sun, Jun 27, 2021 at 9:19 PM



1D3E21A4-412B-432C-A446-B7E8F434EE8E.jpeg
1514K

Ann McKirdy <ainenicamhlaidh@gmail.com>
To: Ann McKirdy <ainenicamhlaidh@gmail.com>

Fri, Mar 20, 2026 at 8:06 AM

---------- Forwarded message ---------
From: **Ann McKirdy** <ainenicamhlaidh@gmail.com>
Date: Sun, 27 Jun 2021 at 21:19
Subject: Dune destruction every minute of the summer
To: sinead maguire <sineadmaguire@yahoo.com>



1D3E21A4-412B-432C-A446-B7E8F434EE8E.jpeg
1514K

Sent to Councillor Maguire 2021 Sledding on Dunes

My question is with regards to the signage and the location of safety lilfebuoys, what distance from the foreshore were they erected? This historical evidence is a clear indicator of severe dune erosion since the establishment of the looped trail over the Special Area of Conservation.

Please advise,
Yours faithfully,
Ann McKirdy

On Thu, Mar 5, 2020 at 10:00 PM Ann McKirdy <annmckirdy@me.com> wrote:

Sent from my iPhone

Ann McKirdy <ainenicamhlaidh@gmail.com> Thu, Mar 5, 2020 at 10:11 PM
To: enviro@sligococo.ie

To whom it may concern,
I am forwarding the following photos as evidence of the massive erosion and damage the walking path, 'looped trail' has done to the Special Area of Conservation in Strandhill. You can see from the photos that huge tranches of the dunes have collapsed. They have not yet been removed by the sea but the scale of devastation caused to these fragile dune systems is extensive and irreparable and undeniable.

I would like to hear what the Council's plan for stabilisation of the dunes and the preservation of this Special Area of Conservation going forward.

This is urgent, I am requesting an urgent response.
Yours faithfully,
Ann McKirdy
[Quoted text hidden]

Ann McKirdy <ainenicamhlaidh@gmail.com> Fri, Mar 20, 2026 at 8:07 AM
To: Ann McKirdy <ainenicamhlaidh@gmail.com>

---------- Forwarded message ---------
From: **Ann McKirdy** <annmckirdy@me.com>
Date: Thu, 5 Mar 2020 at 22:00
Subject: Dune erosion Strandhill
To: <ainenicamhlaidh@gmail.com>

Sent from my iPhone

5 attachments



IMG_4900.JPG
1141K



IMG_4901.JPG
1392K



IMG_4902.JPG
1092K



IMG_4903.JPG
1016K



IMG_4904.JPG
1082K

Gmail

Ann McKirdy <ainenicamhlaidh@gmail.com>

Dune Erosion Strandhill

7 messages

Dune Erosion

Ann McKirdy <annmckirdy@me.com>
To: ainenicamhlaidh@gmail.com

Thu, Mar 5, 2020 at 9:59 PM

Sent from my iPhone

5 attachments



IMG_4900.JPG
1141K



IMG_4901.JPG
1392K



IMG_4902.JPG
1092K



IMG_4903.JPG
1016K



IMG_4904.JPG
1082K

Ann McKirdy <annmckirdy@me.com>
To: ainenicamhlaidh@gmail.com

Thu, Mar 5, 2020 at 10:00 PM

Sent from my iPhone

12 attachments



IMG_4903.JPG
1016K



IMG_4904.JPG
1082K



IMG_4905.JPG
1362K



IMG_4906.JPG
1035K



IMG_4907.JPG
1339K



IMG_4908.JPG
1633K



IMG_4909.JPG
1351K



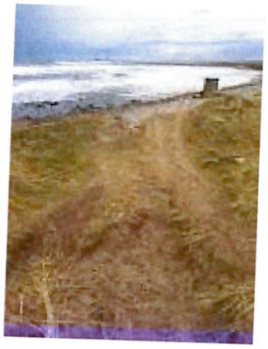
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1249K



IMG_4911.JPG
1430K



IMG_4912.JPG
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IMG_4913.JPG
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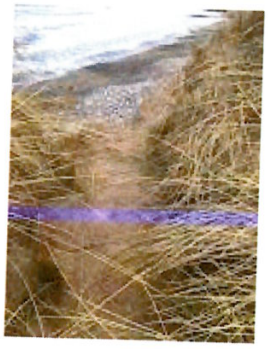
IMG_4914.JPG
1475K

Ann McKirdy <annmckirdy@me.com>
To: ainenicamhlaidh@gmail.com

Thu, Mar 5, 2020 at 10:01 PM

Sent from my iPhone

10 attachments



IMG_4925.JPG
1734K



IMG_4926.JPG
1554K



IMG_4927.JPG
1064K



IMG_4928.JPG
1156K



IMG_4929.JPG
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IMG_4930.JPG
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IMG_4931.JPG
1071K



IMG_4932.JPG
1064K



IMG_4933.JPG
1013K



IMG_4934.JPG
955K

Ann McKirdy <annmckirdy@me.com>
To: ainenicamhlaidh@gmail.com

Thu, Mar 5, 2020 at 10:00 PM

Sent from my iPhone

10 attachments



IMG_4915.JPG
1375K



IMG_4916.JPG
1616K



IMG_4917.JPG
1725K



IMG_4918.JPG
1400K



IMG_4919.JPG
1260K

I am writing to submit a formal complaint to the Sligo Co. Co. with regards to the lack of an Appropriate Assessment for the development of a Lub Naisiúnta over the Strandhill sand dune system is contained within two SACs: Cummeen Strand/Drumcliff Bay SAC (627) and Ballysadare Bay SAC (622) protected under Annex I of the EU Habitats Directive (92/43/EEC) and the continued pursuit of development fu[illegible]r paths over these protected Special Areas of Conservation. A new path has been proposed across the SAC by the Airport to facilitate vehicular parking and pedestrian access to Killaspugbrone Beach.

I alerted the Sligo Co. Co., The Environment Department of the Sligo Co. Co., Bord Failte, and Leader at the time the proposal for a national looped trail first came to my attention prior to the launch. Records of my communications are on file at Sligo Co. Co. My concern for the protection of this dune system has not only been ignored, the campaign to promote the looped trail over the SAC has intensified. National marketing campaigns on T.V., internet, radio in print have shown promoted this area through the depiction of captivating images of this delicate eco system.

I request that you address :

1. Why an appropriate assessment mandated under EU law was not carried out prior to launching this looped trail. The Habitats Directive (92/43/EEC) and the associated Birds Directive (2009/147/EC) are transposed into Irish legislation by Part XAB of the 2000 Act and the Birds and Natural Habitats Regulations 2011.2 The legislative provisions for appropriate assessment screening for planning applications are set out

2. Why the Sligo Co. Co has proceeded with further plans to launch further trails when the looped trail has had such a devastating impact on the dune system.

3 Why when public pressure increased to protect the dunes a sign was erected by Sligo Co. Co. to point people towards Shelly Valley, an exceptionally important biodiverse site with a steep dune face that has been decimated with large groups of athletes using the dune face for training. Not only athletes and walkers going up but people on toboggans coming down. (I also sent photographs of this to the Sligo Co. Co. to request intervention) This was further exacerbated by the wide promotion on RTE of Shelly Valley when used for a timed family challenge on *Ireland's Fittest Family.*

4. I would like to know why the objectives outlined below in the NPWS Conservation Document August 2013 (extracts below) have been completely ignored. Clearly, these unique fragile dune systems were identified as being extremely vulnerable to human tramping.

5 I would like an explanation as to why the recommendations in the The Draft Amendment to the Strandhill Development Plan adopted in October 2013 have been flagrantly ignored. The NPWS Dune Report, August 2013 publication was concurrent with the timing of the Draft Amendment to the Strandhill Development Plan. This would suggest that the precautionary principle has been ignored. (Likely to have a Significant Effect The triggers for appropriate assessment are based on a 'likelihood' (read as 'possibility') of a potential significant effect occurring and not on certainty. This test is based on the precautionary principle.)

Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC (site code 627) Conservation objectives supporting document -coastal habitats NPWS

The distribution of sand dune habitats within Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC is presented in Appendix I. As part of the Coastal Monitoring Project (CMP) detailed individual reports and habitat maps were produced for each sub-site and these are included in a set of Appendices to this document (Appendices II to V).

Strandhill sand dune system is contained within two SACs: Cummeen Strand/Drumcliff Bay SAC (627) and Ballysadare Bay SAC (622).

This complaint deals with the northern section of Strandhill dune system, which is contained within Cummeen Strand/Drumcliff Bay SAC. This northern part of Strandhill also contains an airport, a sewage treatment plant and a low density plantation on fixed dunes.

In Ireland, there are nine sand dune habitats (including annual vegetation of drift lines) listed under **Annex I of the EU Habitats Directive (92/43/EEC)** (* denotes a priority habitat): Annual vegetation of drift lines (1210) Embryonic shifting dunes (2110) Shifting dunes along the shoreline with Ammophila arenaria (2120) Fixed coastal dunes with herbaceous vegetation (grey dunes) (2130) *

The EU Annex I sand dune habitats recorded at Strandhill by the CMP include, **Fixed dunes, Dune slack, Dunes with Salix repens, Mobile dunes, Embryonic dunes, Perennial vegetation of stony banks and Annual vegetation of driftlines.**

The dunes at Strandhill in particular are important as they support a population of the Annex II species Vertigo angustior. A species listed on the Flora (Protection) Order 1999 - round leaved wintergreen (Pyrola rotundifolia) has also been recently recorded from the site (K. Gaynor, pers. comm.).

1 Overall objectives The overall objective for 'Embryonic shifting dunes' in Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC is to **'maintain the favourable conservation condition'.**

2 The overall objective for 'Shifting dunes along the shoreline with Ammophila arenaria' in Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC is to **'restore the favourable conservation condition'.**

3 The overall objective for 'Fixed coastal dunes with herbaceous vegetation' in Cummeen Strand/ Drumcliff Bay (Sligo Bay) SAC is to **'restore the favourable conservation condition'**. These

objectives are based on an assessment of the recorded condition of each habitat under a range of attributes and targets. The assessment is divided into three main headings (a) Area (b) Range and (c) Structure and Functions.

At the Strandhill sub-site the extent of mobile dunes is considered unfavourable-inadequate owing to the impacts of natural erosion which is **compounded in places by human disturbance mainly from trampling.** Mobile dunes are almost absent from the northern section of the site where fixed dunes are fronted by a steep eroding ridge (Ryle et al., 2009).

I look forward to your reply.

Yours sincerely,

Ann McKirdy

This is disgraceful and it continues. The only effective means of communication I have had with Sligo Co. Co. has been through FOI, which they have now issued a blanket refusal as I have requested too many in the past 12 months according to them.

This is a formal complaint to the Minister of Environment.
I look forward to your response.
Yours faithfully,
Ann McKirdy

I look forward to your response.
Sincerely,
Ann McKirdy

---

4 attachments



IMG_8639.JPG
1430K



IMG_8633.JPG
1240K



IMG_8635.JPG
1130K

IMG_8637.MOV
8429K

Ann McKirdy <ainenicamhlaidh@gmail.com>
To: minister.ryan@decc.gov.ie
Wed, Jan 5, 2022 at 12:34 AM

Dear Minister Ryan,
I would like to add further details to my formal complaint. The Strandhill Development Mini Plan. 2011-2017. Variation 1, October 2013 - was to have been added as Chapter 44 to the Sligo Co. Development Plan. This was never done. When I went into the Sligo Co. Co. Planning Office on August 10th 2021, the first day the Planning Office opened following Covid Lockdown to request to see the hard copy, I was told this was online. When I insisted that I see the hard copy, original document, I was refused. I spoke with the Senior Planner also who approved the PL 19218 monstrosity in my cul de sac. He asked why I did not object when the Planning Notice was erected, PL 18365, was the original grant for permission. This planning application was approved without a sign ever being erected onsite. This is confirmed by the Architect/Owner, John Monahan's new Planning Application which states it is a resubmission

of the original plan (which it is not, the new plan added a basement and increased the height - noted as a 'reduction' from 9.05m to 9.5 m by the Planners, it also increased the mass of the house.)

I am adding this to my complaint as my request for the CCTV of my visit to the Planning Office that day was deleted. I brought this to the attention of the Data Protection Commission. They are still investigating, however, the signage in the Planning Office for CCTV and Data Protection listed the building supervisor as the contact for CCTV request instead of the Data Officer. I have photographic evidence of the original and the amended notice.

It is illegal not to retain a hard copy of the Planning Documents, however, it explains why the rezoning of land is not recorded historically. The rezoning officially was uploaded to PRAI in September 2017, 4 years after it was supposedly rezoned. Planning Law requires rezoning to be effective immediately.

Moreover, there is no record of a residential land sale in Larass, Strandhill to correspond to the purchase of this site. It was sold and bought as agricultural.

Zoning of land is a function of the Elected Representatives, it is an executive function. This is a shocking derogation from the law. It is planning fraud.
I look forward to your reply.
Sincerely,
Ann McKirdy
[Quoted text hidden]

4 attachments



IMG_8639.JPG
1430K



IMG_8633.JPG
1240K



IMG_8635.JPG
1130K

IMG_8637.MOV
8429K

Ann McKirdy <ainenicamhlaidh@gmail.com>
To: minister.ryan@decc.gov.ie

Wed, Jan 12, 2022 at 10:25 PM

Dear Minister Ryan,
I am requesting confirmation of receipt of my formal complaint.

Many thanks,
[Quoted text hidden]

4 attachments



IMG_8639.JPG
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IMG_8633.JPG
1240K



IMG_8635.JPG
1130K

IMG_8637.MOV
8429K

Ann McKirdy <ainenicamhlaidh@gmail.com> Thu, Jan 13, 2022 at 1:38 PM
To: minister.ryan@decc.gov.ie

Our Ref: CCAE-MO-00113-2022
Dear Mr. Ryan,
I am amending my complaint, my reference to the Whorl Snail is incorrectly noted as Annex I, it is Annex II and vulnerable to the effects of negative changes in wetness conditions. The site A17 beside the site these trees were felled on was the subject of an Appropriate Assessment in 2013. The findings were conclusive, the felling of trees would have a negative impact on the Whorl Snail.
I am attaching information on the Whorl Snail and the Appropriate Assessment from 2013 and the SEA from the same period.
SIncerely,
Ann McKirdy

Whorl snails

There are eight species of the tiny whorl snails in Ireland, and three are protected under Annex II of the Habitats Directive, *Vertigo geyeri*, *V. angustior* and *V. moulinsiana*.

These species are all dependant on stable and specific ground water conditions, and as they only live for just over a year, they are vulnerable to the effects of negative changes in wetness conditions and have been lost from many sites both in Ireland and across the EU.

The Republic of Ireland has 14 SACs for *Vertigo geyeri*, 12 for *V. angustior*, and 7 for *V. moulinsiana*, a few of which overlap, and with one SAC hosting all three species.

NPWS funded a monitoring programme to assess the condition of the populations of the three *Vertigo* species within their SACs, and at a range of representative sites outside SACs throughout their range in the country. This research was carried out between 2008 and 2010. The results were published as Irish Wildlife Manual 55 [3,355B].

The monitoring assessed the amount and the quality of habitat present for each of the species at the sites being studied, and surveys also sampled repeated transects in more detail to identify more subtle changes in the micro-habitats of these very small species.

The results of the survey work will be maintained in a database that will allow useful comparison during repeat visits, aid the conservation of the sites by providing management recommendations, and assess the condition of the sites for six year EU reporting.

[Quoted text hidden]

6 attachments



IMG_8639.JPG
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IMG_8633.JPG
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IMG_8635.JPG
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IMG_8637.MOV
8429K

AA Habitats Directive Screening Report Siobhan Ryan 25th October 2013.pdf
1098K

Strandhill Mini-Plan - SEA Addendum I to Screening Report (Proposed Amendments) - 28 June 2013 (1).pdf
181K

Ann McKirdy <ainenicamhlaidh@gmail.com> Tue, Feb 8, 2022 at 11:45 AM
To: darragh.obrien@oireachtas.ie

Dear Minister O'Brien,

I am not sure which department the responsibility for oversight of Planning and Development in National Heritage Areas and SAC's. However, I have reported this and have not heard back. This entire area has been developed as a car park. This is NEW. There was a small access road that had car parking space, however, there is now a whole new Car Park which necessitates an Appropriate Assessment given that it is located on Knocknarea Mountain on the side where the major neolithic discoveries have been made. This is close to the site of the UNESCO world heritage application.

It is not right that Sligo Co. Co. do not adhere to Planning Legislation mandated under EU law to protect SAC's and NHA's.
Please advise,
[Quoted text hidden]

6 attachments



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IMG_8633.JPG
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IMG_8635.JPG
1130K

IMG_8637.MOV
8429K

AA Habitats Directive Screening Report Siobhan Ryan 25th October 2013.pdf
1098K

Strandhill Mini-Plan - SEA Addendum I to Screening Report (Proposed Amendments) - 28 June 2013 (1).pdf
181K

Darragh O'Brien <Darragh.OBrien@oireachtas.ie> Tue, Feb 8, 2022 at 12:28 PM
To: Ann McKirdy <ainenicamhlaidh@gmail.com>

Dear Ann,

Thank you for your email.

As matters relating to planning come under the remit of the Minister of State for Planning, Peter Burke T.D., your email has been redirected to his office for attention and reply to you.

If you would like to follow up directly, Minister Burke's Office can be contacted at ministerofstate@housing.gov.ie .

Kind Regards,

David Oliver

EO to Darragh O'Brien T.D.

Minister for Housing, Local Government and Heritage

Constituency Office

[Quoted text hidden]

Beartas ríomhphoist an Oireachtais agus séanadh. oireachtas.ie/ga/email-policy/
Oireachtas email policy and disclaimer. oireachtas.ie/en/email-policy/

Ann McKirdy <ainenicamhlaidh@gmail.com> Wed, Mar 23, 2022 at 8:03 PM
To: minister.ryan@decc.gov.ie

Dear Minister Ryan,
I have not heard back from you with regards to my complaint.
Please respond as soon as possible.
Many thanks,
Sincerely,
Ann McKirdy
[Quoted text hidden]

Minister Ryan <Minister.Ryan@decc.gov.ie> Thu, Mar 24, 2022 at 9:27 AM
To: Ann McKirdy <ainenicamhlaidh@gmail.com>

Dear Ann

I would like to acknowledge receipt of your email below.

Your case was transferred to the Department of Housing as the Department of Housing oversee planning regulation and legislation.

If you email minister@housing.gov.ie they will be able to give you an update there.

Kind Regards

Dean Maher

Ministers Office

From: Ann McKirdy <ainenicamhlaidh@gmail.com>
Sent: Wednesday 23 March 2022 20:03
To: Minister Ryan <Minister.Ryan@decc.gov.ie>
Subject: Re: Complaint about Sligo Co. Co. non adherence to EU law requiring appropriate assessments

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Minister Ryan,

I have not heard back from you with regards to my complaint.

Please respond as soon as possible.

Many thanks,

Sincerely,

Ann McKirdy

On Thu, Jan 13, 2022 at 1:38 PM Ann McKirdy <ainenicamhlaidh@gmail.com> wrote:

> Our Ref: CCAE-MO-00113-2022
>
> Dear Mr. Ryan,
>
> I am amending my complaint, my reference to the Whorl Snail is incorrectly noted as Annex I, it is Annex II and vulnerable to the effects of negative changes in wetness conditions. The site A17 beside the site these trees were felled on was the subject of an Appropriate Assessment in 2013. The findings were conclusive, the felling of trees would have a negative impact on the Whorl Snail.
>
> I am attaching information on the Whorl Snail and the Appropriate Assessment from 2013 and the SEA from the same period.
>
> SIncerely,
>
> Ann McKirdy

Whorl snails

There are eight species of the tiny whorl snails in Ireland, and three are protected under Annex II of the Habitats Directive, *Vertigo geyeri*, *V. angustior* and *V. moulinsiana*.

These species are all dependant on stable and specific ground water conditions, and as they only live for just over a year, they are vulnerable to the effects of negative changes in wetness conditions and have been lost from many sites both in Ireland and across the EU.

The Republic of Ireland has 14 SACs for *Vertigo geyeri*, 12 for *V. angustior*, and 7 for *V. moulinsiana*, a few of which overlap, and with one SAC hosting all three species.

NPWS funded a monitoring programme to assess the condition of the populations of the three *Vertigo* species within their SACs, and at a range of representative sites outside SACs throughout their range in the country. This search was carried out between 2008 and 2010. The results were published as Irish Wildlife Manual 55

[3,355B].

[Quoted text hidden]
[Quoted text hidden]

Disclaimer:

This electronic message contains information (and may contain files), which may be privileged or confidential. The information is intended to be for the sole use of the individual(s) or entity named above. If you are not the intended recipient be aware that any disclosure, copying, distribution or use of the contents of this information and or files is prohibited. If you have received this electronic message in error, please notify the sender immediately. This is also to certify that this mail has been scanned for viruses.

Tá eolas sa teachtaireacht leictreonach seo (agus b'fhéidir sa chomhaid ceangailte leis) a d'fhéadfadh bheith príobháideach nó faoi rún. Is le h-aghaidh an duine/na ndaoine nó le h-aghaidh an aonáin atá ainmnithe thuas agus le haghaidh an duine/na ndaoine sin amháin atá an t-eolas. Murab ionann tusa agus an té a bhfuil an teachtaireacht ceaptha dó bíodh a fhios agat nach gceadaítear nochtadh, cóipeáil, scaipeadh nó úsáid an eolais agus/nó an chomhaid seo. Más trí earráid a fuair tú an teachtaireacht leictreonach seo cuir, más é do thoil é, an té ar sheol an teachtaireacht ar an eolas láithreach. Deimhnítear leis seo freisin nár aims odh víreas sa phost seo tar éis a scanadh.

Reported Dune Erosion - 2020.



IMG_4920.JPG
1221K



IMG_4921.JPG
1578K

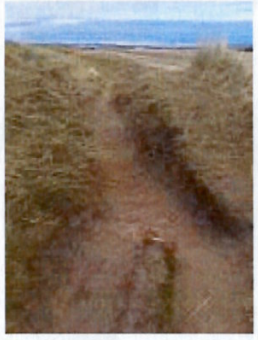


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1615K

Consistent 2020 Reporting. Dune Erosion due to huge Increase in Visitors on Dunes



IMG_4923.JPG
1502K



IMG_4924.JPG
1432K

Ann McKirdy <ainenicamhlaidh@gmail.com> Thu, Mar 5, 2020 at 10:05 PM
To: enviro@sligococo.ie

To whom it may concern,
I am forwarding photos I took this evening. As you can see from the photos the entire dune system outside the fence has collapsed. This is the trail that walkers had access to.

Complaint to Minister Ryan

Gmail

Ann McKirdy <ainenicamhlaidh@gmail.com>

Complaint about Sligo Co. Co. non adherence to EU law requiring appropriate assessments

8 messages

Ann McKirdy <ainenicamhlaidh@gmail.com> Tue, Jan 4, 2022 at 11:50 PM
To: minister.ryan@decc.gov.ie

Dear Minister Ryan,
I am writing to address a formal complaint to the Minister of the Environment and to report that Sligo Co. Co. has been intentonally flouting their obligation to undertake appropriate assessments under EU Habitats Directive for developments in and near NHA's, SAC's and Zones of Archeological Potential.

I have been trying to bring these infractions to the attention of higher authorities, however, the Sligo Co. Co. has continued to thwart my efforts, most recently refusing to issue FOIs.

Cignal Communications

My complaint for environmental enforcement was ignored when Cignal Communications felled all trees during Covid Lockdown in 2021, without a felling license. This site is in a Zone of Archaeolgical Potential and 80 meters from a standing Neolithic Site. They felled approximately 100 trees on the property where they have been approved a mast extension (This is on the designated visually vulnerable road to Sligo Airport). Moreover, it is only 80 meters from the SAC which has an **EU Designated priority 1 habitat species, the Whorl Snail, Vertigo Agusitor.** No appropriate assessment or environmental assessment was undertaken. Sligo Co.. Co. response to my complaint was ; 'No trees were felled onsite' Their designation of the site is the concrete plinth the antennae is erected upon. I sentthem photos of all the trees that were cleared and felled. It is a disgrace and makes a mockery of the law.

I reported several other environmental catastrophes, they have disregarded almost all misquoting legislation as authorisation and permission to continue. Incredibly, they are immune to the requirements of legislation as they are the Competent Authority.

PL19218

I also reported that a house was being built in a buffer zone and the development surpassed the red line for the development limit. The planning application is PL 19218 and all the subsequent planning applications which they kept withdrawing and resubmitting as I brought issues of non compliance to the attention of the Sligo Co. Co. Incredibly, zoning was changed and the former CEO se ntme documents that were changed to prove the zoning was effective since 2013. Incredibly the house Mr. Hayes changed public record to reflect a zoning refusal, as only one house was permitted in 2013, has been built. Furthermore this site commencement notice uses an address of a residence occupied for the past 10 years. This house is three story over basement 10.5 meters high, in a visually vulnerable and high groundwater vulnerable area. The PrePlanning record notes from the local engineer recommend that this is not reported to Irish Water - in spite of the fact that it is the only house approved in 10 years in Strandhill for a septic tank. No environment assessment was carried out on this house. This house protrudes into the landscape and is overlooking an entire neighborhood, furthermore it is back to front and soars into the landscape obliterating the views protected in the Development Plan of Benbulben and Ballysadare Bay.
This house is excavated to a depth of approximately 7 meters, all of the waste from the site was dumped in the adjacent fields, this caused a major environmental imbalance and a lake opened up in the field below the percolation area. Fill and Soil were imported (again reported to Sligo Co. Co enforcement) and the fields were drained, however, according the the Sligo Co. Co. raising the level of agricultural land in the corridor to an SAC and the drainage of this land does not require planning permission. Thus, no enforcement was taken.

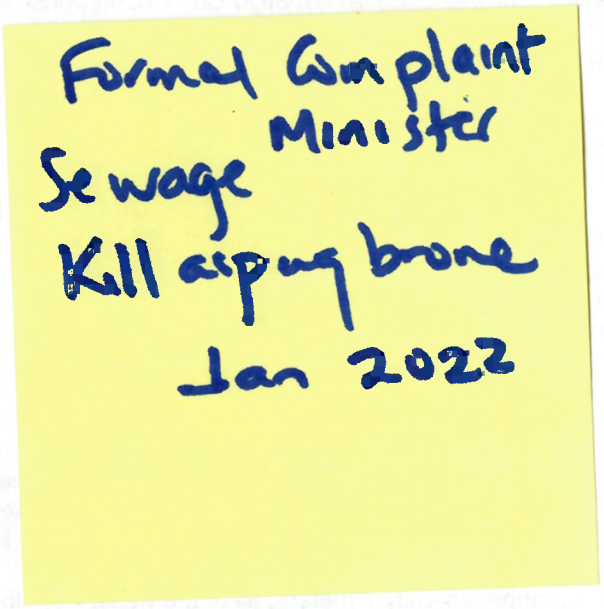
Sewage Treatment

The Sewage Treatment Plant on the SAC in Strandhill recently has been upgraded, no Environmental Impact Assessment or Appropriate Assessment was undertaken, neither was a Part 8 Public Consultation process executed as required by law.

Killaspugbrone Loop Trail

The Looped Trail over the EU Designated SAC Dunes system and Priority 1 Habitats were developed and way markers installed without any protection for the SAC - again without any AA, EIA or Public Consultation Part 8.

My recent FOI to request details of the number of visitors over the SAC at Killaspugbrone revealed that in one month alone, June 2021 16,000 visitors accessed the trail via the WAW sign, moreover there are many other access points, through the Caravan Park, via the Airport, via Dorrins Strand, footfall in excess of 10,000 additional visitors, so one month, 26,000 visitors on the SAC with no protection in place for the Marram Grass Dunes system protected under EU Law. Furthermore the path traverses a saltwater marsh area, also protected in Ballysadare Bay SAC and the site for the protection of the Brent Geese - this path is completely submerged under approximately 2-4 feet of water at high tide - the National Heritage Stone wall is a crumble of rocks now where people have tried to walk on higher ground to pass.


Formal Complaint
Minister
Sewage
Killarney bronc
Jan 2022

Formal Complaint

Gmail

Ann McKirdy <ainenicamh laidh@gmail.com>

Formal Complaint SAC - Dunes Strandhill and proposal for further paths over the SAC

1 message

Dunes

Tom Kilfeather <tkilfeather@sligococo.ie>
To: "ainenicamhlaidh@gmail.com" <ainenicamhlaidh@gmail.com>

Fri, Jul 9, 2021 at 1:28 PM

Dear Ms McKirdy,

I have referred your e-mail to thePlanning Directorate for direct response.

Tom Kilfeather
Acting Chief Executive.

Sligo County Council, Riverside, Sligo, F91 Y763

+353-71-9111450-Office Phone No

+353-87-2626849- Mobile No
tkilfeather@sligococo.ie
sligococo.ie | sligo.ie

Sligo County Council
Comhairle Chontae Shligigh

Sligo.

Dunes 2021
Formal Complaint

From: Ann McKirdy <ainenicamhlaidh@gmail.com>
Sent: Friday 9 July 2021 01:29
To: Tom Kilfeather <tkilfeather@sligococo.ie>
Subject: Formal Complaint SAC - Dunes Strandhill and proposal for further paths over the SAC

Date: 9/7/2021

Dear Mr. Kilfeather,

Blue Rock

Surfing

EPA email 2023

Eve O'Sullivan

Subject: URGENT - Strandhill Waste Water Treatment Plant
Attachments: IMG_9525.jpg; IMG_9518.jpg

From: Ann McKirdy <ainenicamhlaidh@gmail.com>
Sent: Wednesday 29 November 2023 20:38
To: Ann Marie Donlon <a.donlon@epa.ie>; Wexford Receptionist <REC_WEX@epa.ie>
Subject: URGENT - Strandhill Waste Water Treatment Plant

Dear Ann Marie,
I am writing to you regarding the Strandhill Waste Water Treatment Plant upgrade which was completed in 2021 to include an increase in capacity to a PE 3700 from 1500.

This development is on the Special Area of Conservation in Strandhill and is dumping into the SAC.

I have requested the Environmental Impact Assessment which is mandated under EU Habitat's Directive and was advised that none was undertaken.

I have not seen the Appropriate Assessment, however, I have grave concerns about the reliability of this given the fact that the pre-screening states that the closest bathing water is 4km away in Rosses Point.

As you will know, Strandhill has recently opened the National Surfing Center of Excellence.

'Blue Rock' the most popular surfing area in Strandhill outside of the sea front in the Village of Strandhill is located directly opposite the Waste Water Treatment Plant (less than 100 m away) The surfers are exposed to the same risk as bathers. They swim in the sea when they are not on the waves. There have been numerous cases of illness reported by surfers including my children from upset stomachs to ear infections to skin infections. They are swimming in sewage.

I am extremely concerned and question the transparency and adherence to EU Law regulating the discharge of waste from waste water treatment plants. This plant is on the SAC and dumps into the SAC.Below are the additional developments that were part of that Waste Water Treatment Plant Upgrade.

- Increased capacity of the existing wastewater treatment plant from 1,500 population equivalent (PE) to 3,700 PE.
- New inlet works, storm water holding tank, secondary biological treatment, settlement tanks, control building and a sludge thickening facility.
- Upgraded the existing Caravan Park Pumping Station.

I am attaching the letter from the Sligo County Council in July 2013 advising the EPA that an Appropriate Assessment was necessary, however, this license was granted prior to this AA being submitted.
Moreover this is less than 500 m from a Shell Fish Farm. https://coneyislandshellfish.ie/

I am very concerned, Sligo Co Co given that the new Draft County Sligo Development Plan is currently open for public consultation, Sligo County Council is planning to approve further extensive high density housing development in Strandhill Village. This Waste Water Treatment Plant is at capacity and the EPA's report has shown a 'fail' result in many categories.

WWTP
Proximity
to Bathers

I am requesting herewith a copy of this Appropriate Assessment for this Waste Water Treatment Plant on the Strandhill SAC dumping into Cumeen Strand SAC undertaken in 2013.

I look forward to your response.

Yours sincerely,
Ann McKirdy

Eve O'Sullivan

From: Licensing Staff <licensing@epa.ie>
Sent: Monday 4 December 2023 10:32
To: ainenicamhlaidh@gmail.com
Subject: URGENT - Strandhill Waste Water Treatment Plant D0107-01
Attachments: IMG_9525.jpg; IMG_9518.jpg

Dear Ms Kirby

Thank you for your e-mail dated 29 November 2023. We understand from the content that your concerns relate to the quality of bathing waters and Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC.

The Agency granted a licence for the waste water discharges from the agglomeration of Strandhill on the 09/10/2013. This licence is now held by Uisce Éireann. The considerations made by the Agency in making their decision are documented in the inspector's report which is available to view on the 'view EPA documents' tab of the licence search pages on www.epa.ie. The licence is also available to view. At the time of licensing, the Agency concluded, following screening for appropriate assessment under the Habitats Directive and Birds Directive, that an Appropriate Assessment was not required. With respect to bathing waters, Strandhill was and is not a designated bathing water under the Bathing Water Regulations.

Sligo County Council is responsible for managing and monitoring identified bathing waters in Co. Sligo and I recommend that you contact them about your concerns. Please note that bathing water quality at Strandhill is not monitored by Sligo County Council. For information on the monitoring of bathing waters, I refer you to www.beaches.ie.

If you have any complaints regarding the waste water discharges from the waste water works serving this agglomeration, please submit them to Uisce Éireann and the EPA. The following link will guide you in that respect : https://www.epa.ie/who-we-are/contact-us/environmental-queries-and-complaints/

We trust that the foregoing is to your satisfaction.

Kind regards
Environmental Licensing Programme
Office of Environmental Sustainability, Wexford
An Clár um Cheadúnú Comhshaoil
An Oifig um Inbhuanaitheacht Comhshaoil, Loch Garman

epa Environmental Protection Agency

053-9160600
licensing@epa.ie
www.epa.ie

EPA Licencing

From: Ann McKirdy <ainenicamhlaidh@gmail.com>
Sent: Wednesday 29 November 2023 20:38
To: Ann Marie Donlon <a.donlon@epa.ie>; Wexford Receptionist <REC_WEX@epa.ie>
Subject: URGENT - Strandhill Waste Water Treatment Plant

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I am very concerned, Sligo Co Co given that the new Draft County Sligo Development Plan is currently open for public consultation, Sligo County Council is planning to approve further extensive high density housing development in Strandhill Village. This Waste Water Treatment Plant is at capacity and the EPA's report has shown a 'fail' result in many categories.

I am requesting herewith a copy of this Appropriate Assessment for this Waste Water Treatment Plant on the Strandhill SAC dumping into Cumeen Strand SAC undertaken in 2013.

I look forward to your response.

Yours sincerely,
Ann McKirdy

New

Employer Alert: From 1 Ja | Who needs a WWD Licen | SHASnapshots

Closest Bathing Water! 100m from WWTP Blue Rock Surfing

14 / 119 | 100%

designated shellfish waters. It is recommended that number of faecal coliform should be less than 300 per 100ml in the shellfish water.

In order to establish the required level of treatment and the recommended outfall length, an outfall dispersion model would be required.

3.1.4 Bathing Water Quality

The closest designated bathing waters to Strandhill are Rosses Point, approximately 4km to the north and Dunmoran beach, approximately 8km to the southwest. The beach at Rosses Point is designated as a Blue Flag Beach. The beach at Strandhill not designated as a bathing water. Due to the distance to the Rosses Point beach, it is unlikely that the discharge from Strandhill will have a significant impact. It is considered that if the treatment and dilution are sufficient to not negatively impact the designated shellfish wasters, the impact on the bathing waters at Rosses Point will be negligible.

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3.2 Waste Assimilative Capacity Calculations

The Waste Assimilative capacity was calculated in accordance with the guidance published by the Water Services Training Group. Full details of the methodology for calculating the waste assimilative capacity and effluent standards, and the results for each of the wastewater treatment plants are included in Appendix B.

3.2.1 Tubbercurry WWTW Effluent Discharge Standards

The existing wastewater treatment plant in Tubbercurry discharges to the Tubbercurry River. This stream has a very low 95 percentile flowrate and thus a very low waste assimilative capacity. Two alternative discharge locations have been identified in the River Moy. A waste assimilative capacity calculation has been calculated for each of these three discharge locations. Up to date background water quality was provided by Sligo County Council from January 2011 to January 2012.

2°C Partly cloudy

New National Surf Centre Strandhill less than 200m from WWTP.

Closest Bathing Water! 100m from WWTP
Blue Back Surfing

New National Surf Centre Shoreham
less than 200m from WWTP.

New

Licence
NOT Factual
Incorrect
Rossall is 4K
but Bathing is in
sea opposite WWTP

Find text or tools

REGULATION 20(1) - FURTHER INFORMATION, PARTICULARS AND EVIDENCE

Question	Can you confirm if an Environmental Impact Assessment is required for the proposed development works at the WWTP.
Associated Documents	
Response	Dear EPA, Further to correspondence dated 27th June 2013 which queries the requirement or otherwise for an Environmental Impact Assessment (EIA) for the proposed upgrade of Strandhill sewerage scheme. This matter was considered by our Consultants and it was recommended that an Appropriate Assessment in accordance with the Habitats Directive, is the appropriate mechanism to assess the potential environmental effects of this proposed scheme upgrade. This assessment process is ongoing at present in consultation with the National Parks and Wildlife Service and the Planning Authority. Regards, Noel
Associated Documents	

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Please submit the above information by 04/07/2013.

Please direct any queries that you may have in relation to the above to the Inspector Simon Hussey or to OCLR Admin Team D.

Yours sincerely

Environmental Licensing Programme

Office of Climate, Licensing & Resource Use

Tel: 053-9160600

See Introduction

Replacement 2600 PE Plant

DISCLAIMER PAGE

This licence D0107-01 was amended on 2nd December 2021 under Regulation 33 of the European Union (Waste Water Discharge) Regulations 2007 to 2020. The details of **Amendment A** must be read in conjunction with this licence. The amendment document is entitled **"Technical Amendment A"**

Current licence

Environmental Protection Agency
An Ghníomhaireacht um Chaomhnú Comhshaoil

Headquarters
P.O. Box 3000
Johnstown Castle Estate
County Wexford
Ireland

Contradiction P.E Current licence

Headquarters
P.O. Box 3000
Johnstown Castle Estate
County Wexford
Ireland

Waste Water Discharge Licence

Licence Register Number:	D0107-01
Licensee:	Sligo County Council
Agglomeration:	Strandhill

HEADQUARTERS Environmental Protection Agency
JOHNSTOWN CASTLE ESTATE
COUNTY WEXFORD, IRELAND
PHONE: +353-53-9160600
FAX: +353-53-9160699

WASTE WATER DISCHARGE (AUTHORISATION) REGULATIONS 2007, AS AMENDED

WASTE WATER DISCHARGE LICENCE

Decision of Agency, under Regulation 30(1) of the Waste Water Discharge (Authorisation) Regulations 2007, as amended.

Reference Number: **D0107-01**

The Agency in exercise of the powers conferred on it by the Waste Water Discharge (Authorisation) Regulations 2007, as amended, for the reasons hereinafter set out, hereby grants this waste water discharge licence in respect of the agglomeration as specified in Part 1 Schedule of Discharges Licensed of the attached licence subject to Conditions, as set out in the schedules attached hereto.

The licence authorises the discharge of waste water from the waste water works which services the agglomeration described below subject to conditions.

A copy of the Decision is attached.

Authorised Discharges, in accordance with Regulation 5(2) of the Waste Water Discharge (Authorisation) Regulations 2007, as amended.

Discharges from agglomerations with a population equivalent of 2,001 to 10,000

GIVEN under the Seal of the Agency this 09 day of October 2013

PRESENT when the seal of the Agency was affixed hereto:

Dr Karen Creed

~~Director~~/Authorised Person

INTRODUCTION

This introduction is not part of the licence and does not purport to be a legal interpretation of the licence.

This application relates to the Strandhill agglomeration. The sewer network serving the waste water treatment plant is a predominantly separate system and is partly gravity fed and partly pumped. The WWTP was constructed in 1992 and is designed to treat a population equivalent of 1,500. The loading (comprising of both domestic and non-domestic waste water sources) is estimated at 1887 p.e.

The treatment plant provides secondary treatment. Influent to the plant is collected at the inlet works where it is passed through coarse and fine screens and a grit removal system. From the inlet chamber the influent is fed forward to an oxidation ditch fitted with two surface aerators. Following treatment in the oxidation ditch the effluent is fed to a final clarifier before overflowing to the long sea outfall via a sampling manhole. At the sampling manhole the final effluent stream is mixed with any overflowing influent from the inlet chamber.There is one primary discharge point from the agglomeration which discharges to Sligo Bay. There are no secondary discharge points on the sewer network and only one emergency overflow, located at the Sligo Road pumping station. There is one storm water overflow located at the inlet works and this combines with the final effluent prior to discharge at SW001.

The proposals for upgrade works to the plant were finalised in late 2012. The existing plant at Strandhill is to be replaced with a new 2,600 p.e. plant providing secondary treatment in the form of an activated sludge process incorporating an anoxic tank/zone for additional nitrogen removal.

The licence sets out in detail the conditions under which Sligo County Council will control and manage the waste water discharges from the agglomeration covered by this licence.

The legislation governing this licence relates specifically to, and is restricted to, the regulation and control of waste water discharges from the agglomeration. Therefore any odour or noise issue that may be associated with the waste water works including the treatment plant cannot be addressed by this licence.

4. SITE DESCRIPTION

4.1. GENERAL SITE CHARACTER:

Habitat classes	% cover
Salt marshes, Salt pastures, Salt steppes	1
Coastal sand dunes, Sand beaches, Machair	3
Shingle, Sea cliffs, Islets	1
Dry grassland, Steppes	1
Humid grassland, Mesophile grassland	1
Tidal rivers, Estuaries, Mud flats, Sand flats, Lagoons (including saltwork basins)	93
Total habitat cover	100 %

Other site characteristics

Ballysadare Bay extends for about 10 km westwards from the town of Ballysadare and is the most southerly of three inlets comprising the larger Sligo Bay complex. The bay has an average width of c. 2 km. The estuarine channel of the Ballysadare River winds its way through the bay, finally reaching the open sea near the sand spit at Culleenamore. The bay is underlain by sedimentary rocks of limestones, sandstones and shales, which are exposed as low cliffs and small sections of bedrock shore at several locations. The site contains extensive intertidal sand and mudflats, which support good populations of macro-invertebrates. Zostera spp. and Ruppia maritima are present. Well-developed salt marshes occur at several locations around the bay. The site includes part of the Strandhill dune system and some areas of wet and dry grassland.

4.2. QUALITY AND IMPORTANCE:

Ballysadare Bay is an important component of the larger Sligo Bay complex. It supports nationally important populations of four species: Calidris alpina, Limosa limosa, Tringa totanus and Tringa nebularia. It also has a good diversity of other waterfowl species, including Branta bernicla hrota, Cygnus cygnus, Mergus serrator, Pluvialis apricaria and Charadrius hiaticula. The estuarine habitat is of good quality and the site provides both feeding and roost sites for the birds.

4.3. VULNERABILITY

There are no imminent threats to the wintering bird populations. Aquaculture occurs at low intensity and any increase in this activity could cause disturbance to the birds. Localised infilling of the shoreline is a threat.

4.4. SITE DESIGNATION:

4.5. OWNERSHIP

State: Department of Communications, Marine and Natural Resources

Private: multiple

4.6. DOCUMENTATION

Colhoun, K. (2001). I-WeBS Report 1998-99. BirdWatch Ireland, Dublin.

Curtis, T.G.F. and Sheehy Skeffington, M.J. (1998). The salt marshes of Ireland: an inventory and account of their geographical variation. Biology and Environment, Proceedings of the Royal Irish Academy 98B: 87-104.

Falvey, J.P., Costello, M.J. and Dempsey, S. (1997). Survey of Intertidal Biotopes in Estuaries in Ireland. Unpublished report to the National Parks and Wildlife Service, Dublin.

Hunt, J., Derwin, J., Coveney, J. and Newton, S. (2000). Republic of Ireland. Pp. 365-416 in Heath, M.F. and Evans, M.I. (eds). Important Bird Areas in Europe: Priority Sites for Conservation 1: Northern Europe. Cambridge, UK: BirdLife International (BirdLife Conservation Series No. 8).

Irish Wetland Birds Survey (I-WeBS) Database, 1994/95-2000/01. BirdWatch Ireland, Dublin.

Sheppard, R. (1993). Ireland's Wetland Wealth. IWC, Dublin.

5. SITE PROTECTION STATUS AND RELATION WITH CORINE BIOTOPES

5.1. DESIGNATION TYPES at National and Regional level:

5.2. RELATION OF THE DESCRIBED SITE WITH OTHER SITES:

designated at National or Regional level:

designated at International level:

5.3. RELATION OF THE DESCRIBED SITE WITH CORINE BIOTOPE SITES:

CORINE SITE CODE	OVERLAP TYPE	% COVER
80000897		

6. IMPACTS AND ACTIVITIES IN AND AROUND THE SITE

6.1. GENERAL IMPACTS AND ACTIVITIES AND PROPORTION OF THE SURFACE OF THE SITE AFFECTED

IMPACTS AND ACTIVITIES WITHIN the site

CODE	INTENSITY	% OF SITE	INFLUENCE
200	A B **C**	5	+ **0** -
230	A **B** C	30	+ **0** -

IMPACTS AND ACTIVITIES AROUND the site

CODE	INTENSITY	INFLUENCE
120	A **B** C	+ **0** -
401	A **B** C	+ **0** -

6.2. SITE MANAGEMENT AND PLANS

BODY RESPONSIBLE FOR THE SITE MANAGEMENT

SITE MANAGEMENT AND PLANS

A Conservation Plan for the management of the site is in preparation.

7. MAPS OF THE SITE

- Physical map

- Aerial photograph(s) included:

8. SLIDES

Gmail

Ann McKirdy <ainenicamhlaidh@gmail.com>

RE: Joe Corcoran

9 messages

July 2021

sxl@iol.ie <sxl@iol.ie>
To: Ann McKirdy <ainenicamhlaidh@gmail.com>

Fri, Jul 9, 2021 at 3:27 PM

I was asked who owns the land a couple of year ago but nothing since. Is there a proposal ?

Joe

From: Ann McKirdy <ainenicamhlaidh@gmail.com>
Sent: Friday 9 July 2021 15:17
To: sxl@iol.ie
Subject: Att: Joe Corcoran

Dear Joe,

It's Ann McKirdy from Strandhill. I just wanted to ask if you had been and the Airport has been advised of the proposed new pathway by the side of the airport through the forest for accessing Killaspugbrone?

I am really concerned for the impact this increase in traffic will have on the safety of the airport.

Please advise,

Many thanks,

Kind regards,

Ann McKirdy

Ann McKirdy <ainenicamhlaidh@gmail.com>
To: "sxl@iol.ie" <sxl@iol.ie>

New Path

Fri, Jul 9, 2021 at 4:52 PM

Hi Joe,
Yes, it's almost done and dusted. I heard about it at the Strandhill biodiversity meeting about six weeks ago (my first ever with them). I didn't object at the time because I didn't know enough and wasn't prepared. I then emailed to voice my concern for increased traffic on that road given the junction to the main road is very blind, also concerned about increase of tourists around SAC and impact for airport.
Long story short, I was told it was voted on and I was a minority.
I asked to have this re-tabled.

I am opposed to it.
Kind regards,
Ann
[Quoted text hidden]

sxl@iol.ie <sxl@iol.ie>
To: Ann McKirdy <ainenicamhlaidh@gmail.com>

Fri, Jul 9, 2021 at 5:03 PM

Thank you Ann,

July 2021

New Path through SAC funding approved

I have fired a request for info from David Mc Coy as I assume that's who is chairing,

[Quoted text hidden]

Ann Mc..irdy <ainenicamhlaidh@gmail.com> Fri, Jul 9, 2021 at 5:14 PM
To: "sxl@iol.ie" <sxl@iol.ie>

Hi Joe,
Sinéad Maguire was chair, below is her email. I'm only involved in the biodiversity group.

Best wishes,
Ann

PS I am putting in an objection to Sligo Co Co

sineadmaguire@yahoo.com
[Quoted text hidden]

---

sxl@iol.ie <sxl@iol.ie> Fri, Jul 9, 2021 at 7:14 PM
To: Ann McKirdy <ainenicamhlaidh@gmail.com>

Many thanks

[Quoted text hidden]

Ann McKirdy <ainenicamhlaidh@gmail.com> Tue, Jul 13, 2021 at 9:40 AM
To: "sxl@iol.ie" <sxl@iol.ie>

Good morning Joe,
I hope you are well. I'm attaching the summary of the report Sinead Maguire asked me to compile.
I don't know when the next Biodiversity Meeting will be but she proposed it be tabled again after my insistence of the illegality of a new path without an appropriate assessment.

I feel quite intimidated by my minority position opposing development which I feel is not appropriate. Thank you for your support.
Anyway.... it's attached for your perusal.
Kind regards,
Ann
[Quoted text hidden]

Biodiversity Group Strandhill SAC Information .docx
1022K

---

sxl@iol.ie <sxl@iol.ie> Tue, Jul 13, 2021 at 10:07 AM
To: Ann McKirdy <ainenicamhlaidh@gmail.com>

Many thanks for the information Ann,

Best regards

[Quoted text hidden]

Ann McKirdy <ainenicamhlaidh@gmail.com> Tue, Dec 12, 2023 at 11:30 PM
Draft To: "sxl@iol.ie" <sxl@iol.ie>

[Quoted text hidden]

Ann McKirdy <ainenicamhlaidh@gmail.com> Fri, Mar 20, 2026 at 8:13 AM

To: Ann McKirdy <ainenicamhlaidh@gmail.com>

[Quoted text hidden]

Gmail

Complaint to Minister

Ann McKirdy <ainenicamhlaidh@gmail.com>

Complaint about Sligo Co. Co. non adherence to EU law requiring appropriate assessments

9 messages

Ann McKirdy <ainenicamhlaidh@gmail.com> Tue, Jan 4, 2022 at 11:50 PM
To: minister.ryan@decc.gov.ie

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I have been trying to bring these infractions to the attention of higher authorities, however, the Sligo Co. Co. has continued to thwart my efforts, most recently refusing to issue FOIs.

Mast

My complaint for environmental enforcement was ignored when Cignal Communications felled all trees during Covid Lockdown in 2021, without a felling license. This site is in a Zone of Archaeolgical Potential and 80 meters from a standing Neolithic Site. They felled approximately 100 trees on the property where they have been approved a mast extension (This is on the designated visually vulnerable road to Sligo Airport). Moreover, it is only 80 meters from the SAC which has an **EU Designated priority 1 habitat species, the Whorl Snail, Vertigo Agusitor.** No appropriate assessment or environmental assessment was undertaken. Sligo Co.. Co. response to my complaint was ; 'No trees were felled onsite' Their designation of the site is the concrete plinth the antennae is erected upon. I sent them photos of all the trees that were cleared and felled. It is a disgrace and makes a mockery of the law.

I reported several other environmental catastrophes, they have disregarded almost all misquoting legislation as authorisation and permission to continue. Incredibly, they are immune to the requirements of legislation as they are the Competent Authority.

I also reported that a house was being built in a buffer zone and the development surpassed the red line for the development limit. The planning application is PL 19218 and all the subsequent planning applications which they kept withdrawing and resubmitting as I brought issues of non compliance to the attention of the Sligo Co. Co. Incredibly, zoning was changed and the former CEO sent me documents that were changed to prove the zoning was effective since 2013. Incredibly the house Mr. Hayes changed public record to reflect a zoning refusal, as only one house was permitted in 2013, has been built. Furthermore this site commencement notice uses an address of a residence occupied for the past 10 years. This house is three story over basement 10.5 meters high, in a visually vulnerable and high groundwater vulnerable area. The Pre Planning record notes from the local engineer recommend that this is not reported to Irish Water - in spite of the fact that it is the only house approved in 10 years in Strandhill for a septic tank. No environment assessment was carried out on this house. This house protrudes into the landscape and is overlooking an entire neighborhood, furthermore it is back to front and soars into the landscape obliterating the views protected in the Development Plan of Benbulben and Ballysadare Bay.
This house is excavated to a depth of approximately 7 meters, all of the waste from the site was dumped in the adjacent fields, this caused a major environmental imbalance and a lake opened up in the field below the percolation area. Fill and Soil were imported (again reported to Sligo Co. Co enforcement) and the fields were drained, however, according the the Sligo Co. Co. raising the level of agricultural land in the corridor to an SAC and the drainage of this land does not require planning permission. Thus, no enforcement was taken.

Sewage

The Sewage Treatment Plant on the SAC in Strandhill recently has been upgraded, no Environmental Impact Assessment or Appropriate Assessment was undertaken, neither was a Part 8 Public Consultation process executed as required by law.

Looped Trail

The Looped Trail over the EU Designated SAC Dunes system and Priority 1 Habitats were developed and way markers installed without any protection for the SAC - again without any AA, EIA or Public Consultation Part 8.

Killaspugbrone

My recent FOI to request details of the number of visitors over the SAC at Killaspugbrone revealed that in one month alone, June 2021 16,000 visitors accessed the trail via the WAW sign, moreover there are many other access points, through the Caravan Park, via the Airport, via Dorrins Strand, footfall in excess of 10,000 additional visitors, so one month, 26,000 visitors on the SAC with no protection in place for the Marram Grass Dunes system protected under EU Law. Furthermore the path traverses a saltwater marsh area, also protected in Ballysadare Bay SAC and the site for the protection of the Brent Geese - this path is completely submerged under approximately 2-4 feet of water at high tide - the National Heritage Stone wall is a crumble of rocks now where people have tried to walk on higher ground to pass.

Jan 22
Complaint to
Minister

This is disgraceful and it continues. The only effective means of communication I have had with Sligo Co. Co. has been through FOI, which they have now issued a blanket refusal as I have requested too many in the past 12 months according to them.

This is a formal complaint to the Minister of Environment.
I look forward to your response.
Yours faithfully,
Ann McKirdy

I look forward to your response.
Sincerely,
Ann McKirdy

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4 attachments



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Ann McKirdy <ainenicamhlaidh@gmail.com> Wed, Jan 5, 2022 at 12:34 AM
To: minister.ryan@decc.gov.ie

Dear Minister Ryan,
I would like to add further details to my formal complaint. The Strandhill Development Mini Plan, 2011-2017. Variation 1, October 2013 - was to have been added as Chapter 44 to the Sligo Co. Development Plan. This was never done. When I went into the Sligo Co. Co. Planning Office on August 10th 2021, the first day the Planning Office opened following Covid Lockdown to request to see the hard copy, I was told this was online. When I insisted that I see the hard copy, original document, I was refused. I spoke with the Senior Planner also who approved the PL 19218 monstrosity in my cul de sac. He asked why I did not object when the Planning Notice was erected, PL 18365, was the original grant for permission. This planning application was approved without a sign ever being erected onsite. This is confirmed by the Architect/Owner, John Monahan's new Planning Application which states it is a resubmission

of the original plan (which it is not, the new plan added a basement and increased the height - noted as a 'reduction' from 9.05m to 9.5 m by the Planners, it also increased the mass of the house.)

I am adding this to my complaint as my request for the CCTV of my visit to the Planning Office that day was deleted. I brought this to the attention of the Data Protection Commission. They are still investigating, however, the signage in the Planning Office for CCTV and Data Protection listed the building supervisor as the contact for CCTV request instead of the Data Officer. I have photographic evidence of the original and the amended notice.

It is illegal not to retain a hard copy of the Planning Documents, however, it explains why the rezoning of land is not recorded historically. The rezoning officially was uploaded to PRAI in September 2017, 4 years after it was supposedly rezoned. Planning Law requires rezoning to be effective immediately.

Moreover, there is no record of a residential land sale in Larass, Strandhill to correspond to the purchase of this site. It was sold and bought as agricultural.

Zoning of land is a function of the Elected Representatives, it is an executive function. This is a shocking derogation from the law. It is planning fraud.
I look forward to your reply,
Sincerely,
Ann McKirdy
[Quoted text hidden]

4 attachments



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Ann McKirdy <ainenicamhlaidh@gmail.com>
To: minister.ryan@decc.gov.ie

Wed, Jan 12, 2022 at 10:25 PM

Dear Minister Ryan,
I am requesting confirmation of receipt of my formal complaint.

Many thanks,
[Quoted text hidden]

4 attachments



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Ann McKirdy <ainenicamhlaidh@gmail.com> Thu, Jan 13, 2022 at 1:38 PM
To: minister.ryan@decc.gov.ie

Our Ref: CCAE-MO-00113-2022
Dear Mr. Ryan,
I am amending my complaint, my reference to the Whorl Snail is incorrectly noted as Annex I, it is Annex II and vulnerable to the effects of negative changes in wetness conditions. The site A17 beside the site these trees were felled on was the subject of an Appropriate Assessment in 2013. The findings were conclusive, the felling of trees would have a negative impact on the Whorl Snail.
I am attaching information on the Whorl Snail and the Appropriate Assessment from 2013 and the SEA from the same period.
SIncerely,
Ann McKirdy

Whorl snails

There are eight species of the tiny whorl snails in Ireland, and three are protected under Annex II of the Habitats Directive, *Vertigo geyeri*, *V. angustior* and *V. moulinsiana*.

These species are all dependant on stable and specific ground water conditions, and as they only live for just over a year, they are vulnerable to the effects of negative changes in wetness conditions and have been lost from many sites both in Ireland and across the EU.

The Republic of Ireland has 14 SACs for *Vertigo geyeri*, 12 for *V. angustior*, and 7 for *V. moulinsiana*, a few of which overlap, and with one SAC hosting all three species.

NPWS funded a monitoring programme to assess the condition of the populations of the three *Vertigo* species within their SACs, and at a range of representative sites outside SACs throughout their range in the country. This research was carried out between 2008 and 2010. The results were published as Irish Wildlife Manual 55 [3,355B].

The monitoring assessed the amount and the quality of habitat present for each of the species at the sites being studied, and surveys also sampled repeated transects in more detail to identify more subtle changes in the micro-habitats of these very small species.

The results of the survey work will be maintained in a database that will allow useful comparison during repeat visits, aid the conservation of the sites by providing management recommendations, and assess the condition of the sites for six year EU reporting.

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6 attachments



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AA Habitats Directive Screening Report Siobhan Ryan 25th October 2013.pdf
1098K

Strandhill Mini-Plan - SEA Addendum I to Screening Report (Proposed Amendments) - 28 June 2013 (1).pdf
181K

Ann McKirdy <ainenicamhlaidh@gmail.com> Tue, Feb 8, 2022 at 11:45 AM
To: darragh.obrien@oireachtas.ie

Dear Minister O'Brien,
I am not sure which department the responsibility for oversight of Planning and Development in National Heritage Areas and SAC's. However, I have reported this and have not heard back. This entire area has been developed as a car park. This is NEW. There was a small access road that had car parking space, however, there is now a whole new Car Park which necessitates an Appropriate Assessment given that it is located on Knocknarea Mountain on the side where the major neolithic discoveries have been made. This is close to the site of the UNESCO world heritage application.

It is not right that Sligo Co. Co. do not adhere to Planning Legislation mandated under EU law to protect SAC's and NHA's.
Please advise,
[Quoted text hidden]

6 attachments



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181K

Darragh O'Brien <Darragh.OBrien@oireachtas.ie> Tue, Feb 8, 2022 at 12:28 PM
To: Ann McKirdy <ainenicamhlaidh@gmail.com>

Dear Ann,

Thank you for your email.

As matters relating to planning come under the remit of the Minister of State for Planning, Peter Burke T.D., your email has been redirected to his office for attention and reply to you.

If you would like to follow up directly, Minister Burke's Office can be contacted at ministerofstate@housing.gov.ie .

Kind Regards,

David Oliver

EO to Darragh O'Brien T.D.

Minister for Housing, Local Government and Heritage

Constituency Office

[Quoted text hidden]

Beartas ríomhphoist an Oireachtais agus séanadh. oireachtas.ie/ga/email-policy/
Oireachtas email policy and disclaimer. oireachtas.ie/en/email-policy/

Ann McKirdy <ainenicamhlaidh@gmail.com> Wed, Mar 23, 2022 at 8:03 PM
To: minister.ryan@decc.gov.ie

Dear Minister Ryan,
I have not heard back from you with regards to my complaint.
Please respond as soon as possible.
Many thanks,
Sincerely,
Ann McKirdy
[Quoted text hidden]

Minister Ryan <Minister.Ryan@decc.gov.ie> Thu, Mar 24, 2022 at 9:27 AM
To: Ann McKirdy <ainenicamhlaidh@gmail.com>

Dear Ann

I would like to acknowledge receipt of your email below.

Your case was transferred to the Department of Housing as the Department of Housing oversee planning regulation and legislation.

If you email minister@housing.gov.ie they will be able to give you an update there.

Kind Regards

Dean Maher

Ministers Office

From: Ann McKirdy <ainenicamhlaidh@gmail.com>
Sent: Wednesday 23 March 2022 20:03
To: Minister Ryan <Minister.Ryan@decc.gov.ie>
Subject: Re: Complaint about Sligo Co. Co. non adherence to EU law requiring appropriate assessments

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Minister Ryan,

I have not heard back from you with regards to my complaint.

Please respond as soon as possible.

Many thanks,

Sincerely,

Ann McKirdy

On Thu, Jan 13, 2022 at 1:38 PM Ann McKirdy <ainenicamhlaidh@gmail.com> wrote:

Our Ref: CCAE-MO-00113-2022

Dear Mr. Ryan,

I am amending my complaint, my reference to the Whorl Snail is incorrectly noted as Annex I, it is Annex II and vulnerable to the effects of negative changes in wetness conditions. The site A17 beside the site these trees were felled on was the subject of an Appropriate Assessment in 2013. The findings were conclusive, the felling of trees would have a negative impact on the Whorl Snail.

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These species are all dependant on stable and specific ground water conditions, and as they only live for just over a year, they are vulnerable to the effects of negative changes in wetness conditions and have been lost from many sites both in Ireland and across the EU.

The Republic of Ireland has 14 SACs for *Vertigo geyeri*, 12 for *V. angustior*, and 7 for *V. moulinsiana*, a few of which overlap, and with one SAC hosting all three species.

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[3,355B].

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Tá eolas sa teachtaireacht leictreonach seo (agus b'fhéidir sa chomhaid ceangailte leis) a d'fhéadfadh bheith príobháideach nó faoi rún. Is le h-aghaidh an duine/na ndaoine nó le h-aghaidh an aonáin atá ainmnithe thuas agus le haghaidh an duine/na ndaoine sin amháin atá an t-eolas. Murab ionann tusa agus an té a bhfuil an teachtaireacht ceaptha dó bíodh a fhios agat nach gceadaítear nochtadh, cóipeáil, scaipeadh nó úsáid an eolais agus/nó an chomhaid seo. Más trí earráid a fuair tú an teachtaireacht leictreonach seo cuir, más é do thoil é, an té ar sheol an teachtaireacht ar an eolas láithreach. Deimhnítear leis seo freisin nár aims odh víreas sa phost seo tar éis a scanadh.

Ann McKirdy <ainenicamhlaidh@gmail.com> Fri, Mar 20, 2026 at 9:40 AM
To: Ann McKirdy <ainenicamhlaidh@gmail.com>

---------- Forwarded message ---------
From: **Ann McKirdy** <ainenicamhlaidh@gmail.com>
Date: Tue, Jan 4, 2022 at 11:50 PM
Subject: Complaint about Sligo Co. Co. non adherence to EU law requiring appropriate assessments
To: <minister.ryan@decc.gov.ie>

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4 attachments



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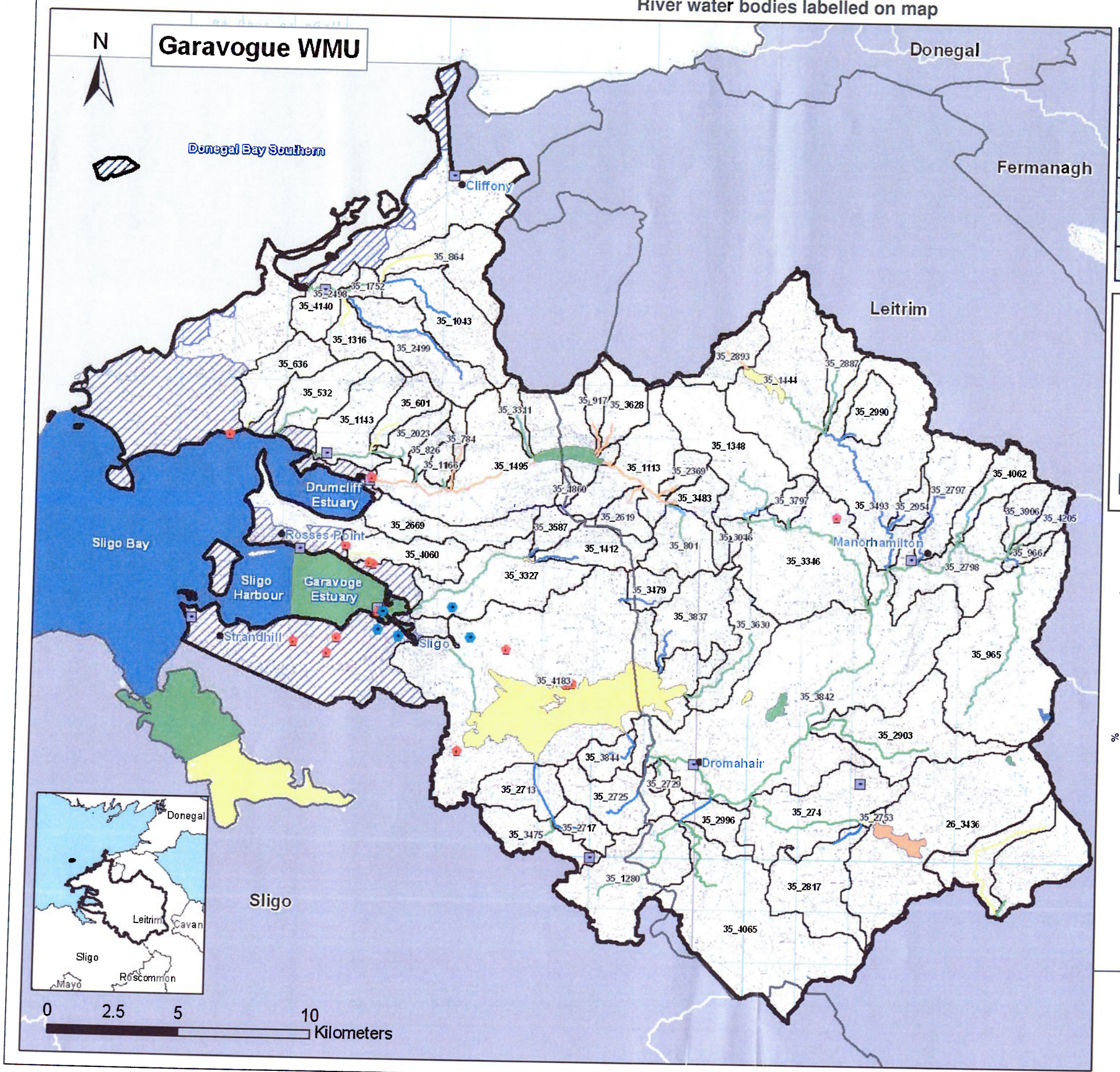


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Garavogue Water Management Unit Action Plan

River water bodies labelled on map



Garavogue Water Management Unit	western river basin district
Area	636 km²
River Basin District	Western RBD
Main Counties	Leitrim/Sligo
Number of river water bodies	66
Number of lake water bodies	10

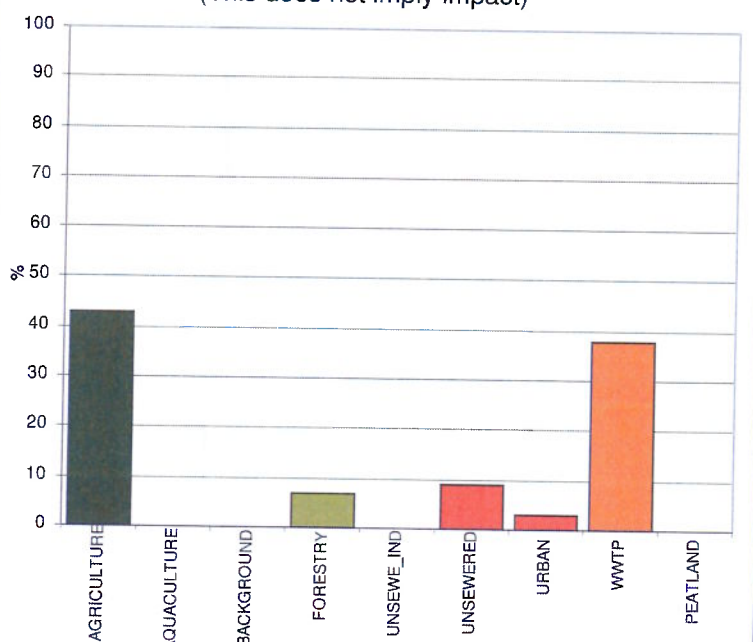
Legend

- Waste Water Treatment Plants
- EPA Licensed Facility (IPPC)
- Local Authority Licensed Discharge
- Coastal Interbasins
- County/City Boundary
- Water Management Units
- WMU Boundary

Status

- High
- Good
- Moderate
- Poor
- Bad
- Unassigned

Sectoral Total Phosphorus Source
(This does not imply impact)

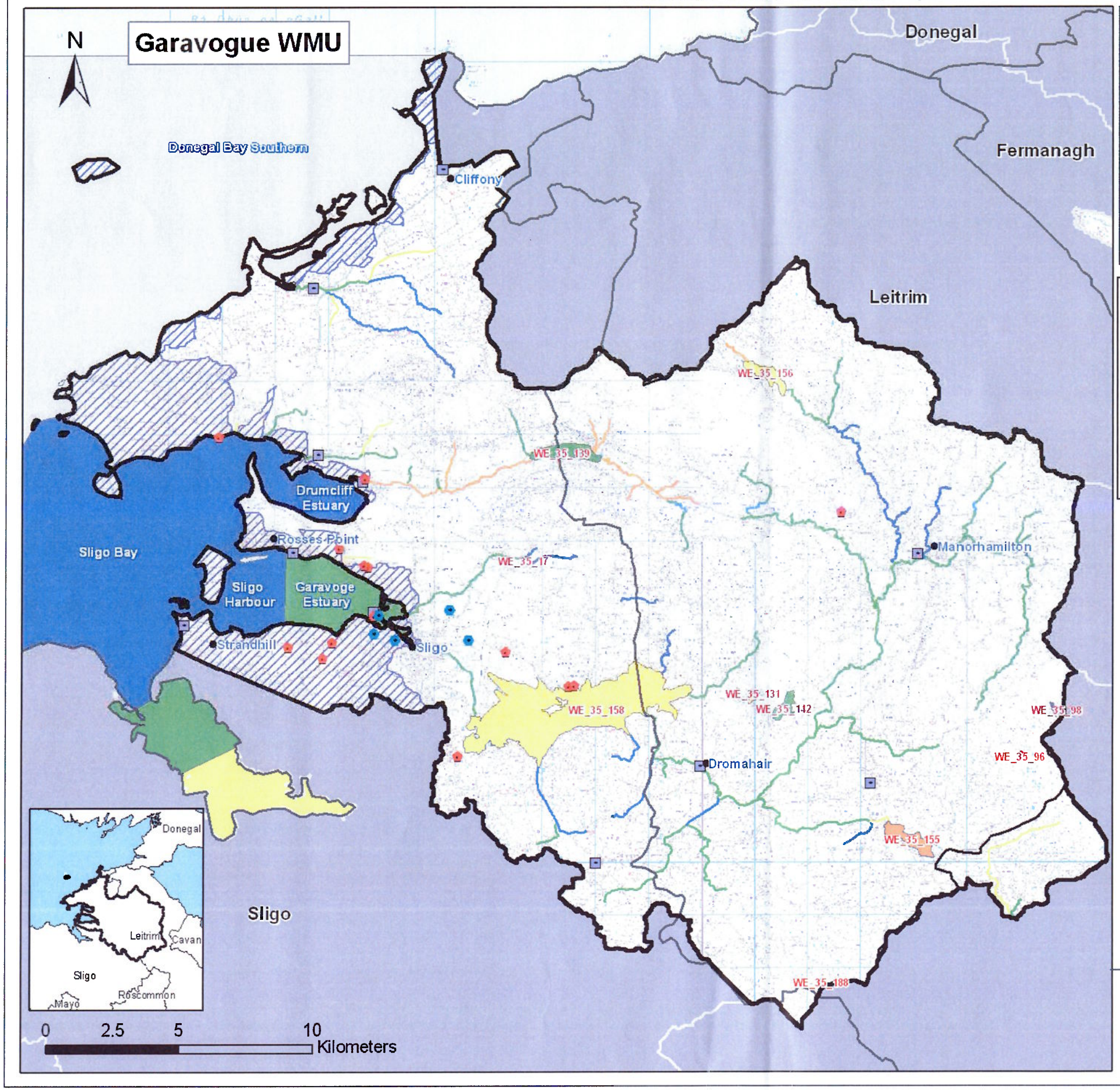


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March 2010

Garavogue Water Management Unit Action Plan

Lake water bodies labelled on map



Garavogue Water Management Unit	western river basin district
Area	636 km²
River Basin District	Western RBD
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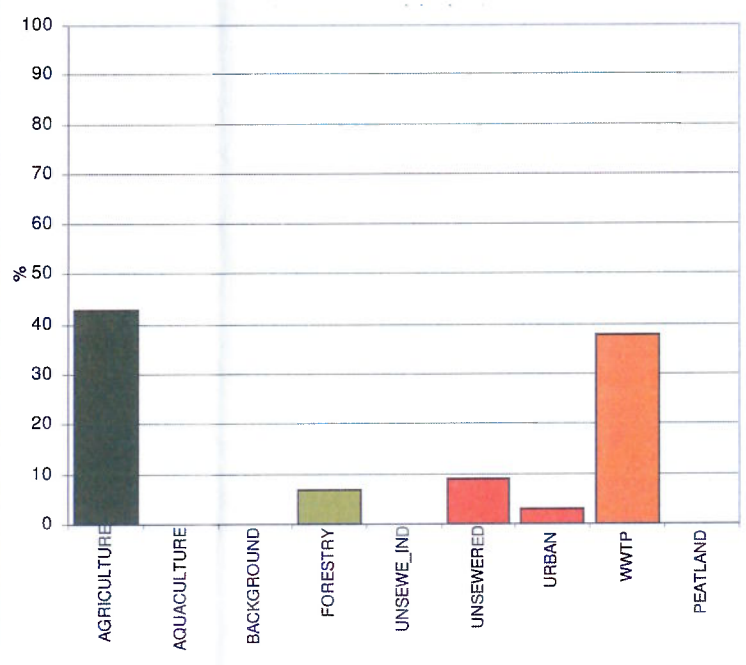
Legend

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Sectoral Total Phosphorus Source
(This does not imply impact)



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March 2010

Garavogue Water Management Unit Action Plan

PROTECTED AREAS

SACs -8: Ben Bulben Glenifff and Glenade Complex, Bunduff Lough and Machair/Trawalua/Mullaghmore, Cumeen Strand/Drumcliff Bay (Sligo Bay), Arroo Mountain, Streedagh Point Dunes, Glenade Lough, Lough Gill and Boleybrack Mountain.
SPAs – 5: Inishmurray SPA, Sligo/Leitrim Uplands SPA, Drumcliff Bay SPA, Ardboline Island and Horse Island SPA, Cummeen Strand SPA
NHA – 2: Crockauns/Keelogyboy Bogs NHA, Dough/Thur Mountains NHA
pNHAs – 13: Bunduff Lough And Machair/Trawalua/Mullaghmore, Inishmurray, Streedagh Point Dunes, Ben Bulben, Gleniff And Glenade Complex, Cummeen Strand/Drumcliff Bay (Sligo Bay), Colgagh Lough, Lough Gill, Knocknarea Mountain And Glen, Arroo Mountain, Glenade Lough, Bonet River O'Donnell'S Rock Wood, Boleybrack Mountain
Surface water Drinking waters – 6: Lough Gill (Cairns Hill and Foxes Den), Gortnaleck river, Lyle stream,Kilsellagh reservoir, Kellogyboy stream (Kellogyboy Private GWS), North Leitrim Regional WSS(L Gill at Greenaun)
Nutrient Sensitive Surface Water (UWWT Directive) – none
Bathing Water – 1:Rosses Point.
Shellfish Waters – 2: Sligo Bay and Drumcliff Bay have recently been designated as Shellfish Waters under national regulations.

STATUS/IMPACTS

Overall status	Of the 66 rivers in this WMU 70% are at High or Good status, just under 30% are at Moderate to Poor status. Out of the 10 lakes assessed within the WMU one is at High status, 3 at Good status , 5 at Moderate status and one at Poor status.
Status elements	For rivers that are monitored within the WMU the Q Score (macroinvertebrates) dictates status. Where rivers are monitored for physico-chemical parameters they all pass the standards. Overall lake status is dictated by monitored macrophyte, nutrient and fish status combined with expert opinion in some cases. 3 of the lake status assignations within the WMU has been determined by extrapolation.
Status of the main rivers within the WMU	The main rivers in the Garavogue WMU are the Bonet river system, the Grange river system and the Drumcliff river system. The most recent EPA status classifications for these rivers indicates that 23% of all river channel length is of High status and 61% is classed as Good. The remainder are classed at Moderate, (5%) or Poor (11%). **BONET** – The Bonet river system has many tributaries including the Shanvaus, Cashel and Killanummery rivers. The Killanummery river is located in the south of the Garavogue WMU, the head waters of which are at Good status, leading to High status before it enters the main Bonet channel. The Cashel Stream, which also joins the main channel is at Good status, and the head water of this stream is at High status. A tributary of the Cashel, the Tillinwillin stream is at Moderate status. This stream flows from Behavel Lough, which is classed at Poor status (due to biological assessment). In the head waters of the main Bonet channel, the river flowing into Glenade Lough is at Poor status (extrapolation from similar monitored catchments)). Glenade Lough itself is classed as Moderate. The next stretch of the river Bonet and its tributaries are classed as High, until it reaches the confluence of the Owenmore (Manorhamiltion) and from there, to where the Bonet enter Lough Gill, the main channel and tributaries are mostly Good status. This includes the Shanvaus tributary, with some High status tributaries entering the channel also. Lackagh Lough and Carrigeencor Lough are classed at Good status and Anarry Lough is at Moderate status. Lough Gill is classed at Moderate status. All small tributaries entering Lough Gill are at either Good or High status. **GARAVOGUE** – The Garavogue river which flows from Lough Gill is classed at Good status. It enters the sea at Sligo Harbour. **DRUMCLIFF** – Only four sections of the Drumcliff system are at Good status – the main Drumcliff river channel and tributaries are classed at Poor. This is due to poor biological assessment and also from extrapolated land use. The head water of the Diffreen river is classed as Good. Also classed as good is a tributary flowing into Glencar Lough, which itself is also at Good status. **GRANGE** – The head waters of the Grange river are classed as High status. A tributary classed as Moderate status inflows at Derry Bridge, and subsequently the river is classed at Good status until it enters the sea at Inishnagor. **DOONOWNEY** – Doonowney river is classed at Moderate status and enters the sea at Drumcliff Bay **CARNEY** – Most of the Carney river channel is classed at Good status, with one tributary classed at Moderate status. The Carney river enters the sea at Drumcliff Bay. **WILLSBOROUGH STREAM** – The head waters of Willsborough river are classed at High status, including the Kilsellagh tributary. The main channel of the stream is classed at Good status.

PRESSURES/RISKS

Nutrient sources	Over 58% of Total Phosphorus is diffuse innature with agriculture accounting for over 40% of the TP. 38% of the TP load is from Waste water treatment plants principally from Sligo Town.
Point pressures	**WWTP** within WMU – 11: 3 in Leitrim: Dromahaire WWTP (stated as at construction in WSIP 07-09), Manorhamilton WTTP, Killargue WWTP and 8 in Sligo: Ballintogher WWTP, Cliffoney WWTP, Grange WWTP, Rosses Point WWTP, Strandhill WWTP, Drumcliffe WWTP, Carney WWTP and Sligo WWTP **Section 4** Licensed Facilities – 14: , 1 in Leitrim (Quarry). 13 in Sligo – (Dairy, college, 2 residential centres, shellfish farm, domestic house, hotel, restaurant, ELV facility (Deepwater quay), quarry, 2 housing estates, car showroom & garage, fuel depot) A visitor centre has been recently provided by Leitrim County Council at Glencar Lake with an on site wastewater treatment system End of Life (ELV) facility at Deepwater Quay **IPPC** Licensed facilities - 5: 5 in Sligo (3 to sewer and a facility that produces bitumen and a facility that treats wood). Leitrim has no IPPC in Garavogue WMU. **WTPs** – 8: Kilsellagh, Lough Gill (Carins and Foxes Den), Benbulben GWS, Castletown GWS Drum East GWS, Kellogyboy GWS and North Sligo Regional supply. **Quarries:** There is a quarry discharging to the catchment of Lough Gill.
Wastewater Treatment Plants (WWTP) and Industrial Discharges	**Ballintogher WWTP –** To be upgrade under small schemes -2011 currently in planning stages, to be upgraded to 350 p.e. **Carney WWTP** – implement pollution reduction programme for shellfish waters. **Drumcliff WWTP –** Sufficient capacity exists at present. **Dromahaire WWTP** - risks to water quality relating to insufficient future WWTP Capacity of current plant. A new treatment plant is currently under construction at Dromahaire as part of the Leitrim Towns and Villages Sewerage Scheme Bundle 1 DBO. This new plant will be commissioned in April 2010. **Manorhamilton WWTP** – ensure capacity of plant is not exceeded. The proposed upgrading of Manorhamilton WWTP is included in Leitrim Towns and Villages Sewerage Scheme Bundle 2, which is at Preliminary Report stage. The essential upgrading of this WWTP to meet effluent discharge standards has been included in our submission to the DoEHLG for funding under the Water Services Investment Programme 2010 – 2012. **Killarga WWTP -** A new treatment plant is currently under construction at Killarga as part of the Leitrim Towns and Villages Sewerage Scheme Bundle 1 DBO. This new plant will be commissioned in April 2010 **Cliffoney WWTP** - risk to water quality relating to insufficient WWTP capacity. Requires investigation prior to capital works. **Grange WWTP** - risk to water quality relating to insufficient WWTP capacity and insufficient assimilative capacity for BOD. Plant requires capital works. **Rosses Point WWTP** - Requires investigation prior to capital works, implement pollution reduction programme for shellfish waters. **Sligo WWTP** – Spare capacity at WWTP. This plant will be O&M by AWI for 20yrs. Implement pollution reduction programme for shellfish waters, requires investigation of CSO's. **Strandhill WWTP** - risk to water quality relating to insufficient WWTP capacity. Plant requires capital works, implement pollution reduction programme for shellfish waters. **Section 4** - Cregg House, the Radisson & a housing estate discharge to a watercourse in Cregg - there is a risk to water quality relating to insufficient assimilative capacity for BOD and nutrients. There is a possible risk from a quarry discharging to a stream in Aghamore. Section 4 - Quarry at Lurganboy – limestone extraction, cement and block making. No other risks from section 4s.

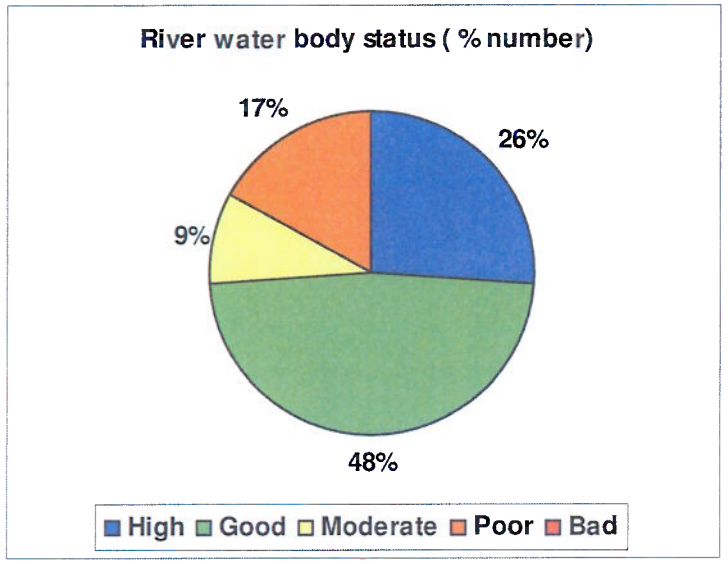
Garavogue Water Management Unit Action Plan

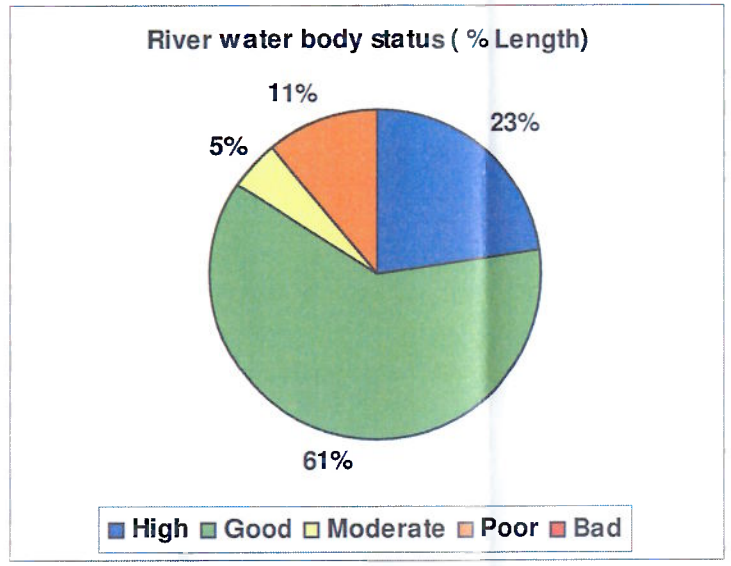
PRESSURES / RISKS	
Quarries, Mines & Landfills	5 quarries within WMU: 2 water bodies at risk from quarries within WMU: IE_WE_35_2499 and IE_WE_35_3842. 3 quarries in Leitrim: Quarry at Lurganboy – limestone extraction, readymix cement and block making, WE_35_3346. Kerrigans Quarry – limestone rock, readymix cement and block making, Tates Quarry, Moneenshinnagh 2 quarries in Sligo: Aghamore & Lugnagall. Historic landfill at Finisklin (in proximity to Sligo Port) in which has been closed since the early 1990's. There is no leachate collection facility in place. Historic Landfill at Manorhamilton No mines within WMU
Agriculture	7 water bodies have been determined to be at risk from agriculture within WMU: IE_WE_35_2669, IE_WE_35_1166, IE_WE_35_1143, IE_WE_35_532, IE_WE_35_2729, IE_WE_35_2023, IE_WE_35_4060.
On-site systems	There are 6,436 OSWTS within the WMU Boundary, 4,462 OSWTS lie within 66 river water bodies. Within the river water bodies 912 OSWTS constitute a potential risk to waters because of where they are sited and constitute a risk to 11 water bodies. The remainder of OSWTS lie in the coastal area between the RWBs and the seashore and may pose a risk to estuarine and coastal water quality and protected areas. At risk RWB's: WE_35_1752, WE_35_4140, WE_35_2669, WE_35_2798, WE_35_2954, WE_35_2023, WE_35_3327, WE_35_3475, WE_35_601, WE_35_2797, WE_35_2996
Forestry	No rivers at risk from Forestry, although the Killanummery river is extensively forested (WE_35_4065) and may pose a risk for the future during any clear felling operations.
Dangerous substances	1 waterbody that may be at risk from sheep dipping activities within the WMU: IE_WE_35_3311. (Sligo) Further investigation into use of old sheep dip tanks would be advisable in the upland areas. Sligo: There is a possible risk from the wood treatment facility (IPPC), the ELV site, the old landfill site and an old IPPC licenced site.
Morphology	7 water bodies have been determined to be at risk from morphology within this WMU: IE_WE_35_3842, IE_WE_35_274, IE_WE_35_2753, IE_WE_35_3587, IE_WE_35_3327, IE_WE_35_1412, IE_WE_35_2996 Possible risk to the Garravogue River from Morphology.
Abstractions	7 water bodies have been determined to be at risk from abstraction within WMU: IE_WE_35_1752, IE_WE_35_4140, IE_WE_35_1043, IE_WE_35_2498, IE_WE_35_2499, IE_WE_35_3327, IE_WE_35_4183 Drinking water supply sources have ceased at L Anarry, Largy, Brackery More, Brackery Beg and Leckaun. Drinking water sources still in operation in the catchment are: North Leitrim Regional WSS(L Gill at Greenaun), Fivemilebourne PWS (mountain spring), Kinlough/Tullaghan PWS (Erriff Spring).
Other	There are no HMWB or AWB within the WMU.

SELECTED ACTION PROGRAMME *NB All relevant basic measures and general supplementary measures/surveys apply*	
Point Sources	WWTP licensing and upgrades will be applied where identified in the needs assessment. Grange WWTP has been prioritised for capital works upgrades as this scheme is necessary to ensure compliance with the Water Framework Directive. Cliffoney and Strandhill WWTP have also been prioritised as they have either inadequate WWTP capacity or insufficient assimilative capacity for BOD, however the water quality data available would suggest that they are not having a significant impact on water quality. Cliffoney, Grange, Strandhill and Rosses Point were included in the WSIP for 2007-2009 and have all been prioritised under the 2009 needs assessment for inclusion on the WSIP 2010-2012. Investigation of sewage and trade discharges and licence review where appropriate will also be carried out. T The following Point source supplementary measures have been suggested for certain river water bodies within the WMU for municipal and industrial pressures: Development control, verification of risk, decision making tools, and relocation of outfall.
Diffuse Sources	Particular measures will be required to address diffuse pollution pressures from agriculture such as the Good Agricultural Practices Regulations investigations and enforcement. Supplementary measures apply within WMU for septic tanks (OSWWTS) including compliance with the new binding EPA Code of Practice for Wastewater Treatment Systems and Disposal Systems. In relation to existing unsewered properties, improvements are required regarding the operational performance, maintenance and monitoring arrangements of septic tanks and other on-site waste water treatment systems serving such properties. In response, the Minister for Environment, Heritage and Local Government intends to bring forward and consult on proposals for legislation during 2010. It is intended that this legislation will be in place by quarter 3 of 2010. The proposed legislation will provide standards for the performance, operation and maintenance of septic tanks and similar on-site wastewater treatment systems. It will also provide for the monitoring and inspection of the performance of such treatment systems and will set out the responsibilities of households served by those systems, including requirements to carry out remedial actions where necessary
Other	Supplementary measures that apply for morphology include: channel investigation, so that any impact on status caused by past drainage schemes in the WMU can be determined and addressed. Compliance with the Bathing Water Directive will also be required. Protection of drinking waters and future abstraction licensing control will also be important basic measures required to ensure good water quality. Further investigation of quarry risk within the WMU is needed before measures can be identified.
OBJECTIVES	
Good status 2015	All water bodies within the WMU must achieve Good status by 2015 unless a specific alternative objective is set out below.
Alternative Objectives	**Extensions Agriculture (Phosphorous Karst Groundwater) (2021)** IE_WE_35_636, IE_WE_35_864, IE_WE_35_1316, IE_WE_35_4060, IE_WE_35_1495, IE_WE_35_784, IE_WE_35_2669

Garavogue Water Management Unit Action Plan

Status of river water bodies within the WMU





			Biological Elements				Supporting Elements					Protected Areas					
Member State Code	Monitored Y (Extrapolated N)	Donor Waterbody	Macroinvertebrates (Q)	FreshWater Pearl Mussel	Fish	Phytobenthos (Diatoms)	Morphology	Specific Polutants	Physio-chemical	Ecological Status	Chemical Status	Special Area of Conservation	Special Protection Area	Nutrient Sensitive Waters	Drinking Water	Objective	Date objective to be achieved
WE_35_1043	N	WE_35_2499								H		Y	Y		Y	HES	2009
WE_35_1113	Y									P		Y				GES	2015
WE_35_1143	N	WE_35_1662								G		Y	Y			GES	2009
WE_35_1166	N	WE_35_2013								G		Y	Y			GES	2009
WE_35_1280	N	WE_35_4065								G						GES	2009
WE_35_1316	N	WE_35_636								M		Y	Y			GES	2021
WE_35_1348	N	WE_35_1444								G		Y				GES	2009
WE_35_1412	Y		H							H						HES	2009
WE_35_1444	Y		G						G	G		Y	Y			GES	2009
WE_35_1495	Y		P						H	P		Y	Y			GES	2021
WE_35_1752	N	WE_35_4140								G						GES	2009
WE_35_1860	N	WE_35_1113								P			Y			GES	2015
WE_35_2023	N	WE_35_1662								G		Y	Y			GES	2009
WE_35_2369	N	WE_35_1113								P						GES	2015
WE_35_2498	N	WE_35_4140								G						GES	2009
WE_35_2499	Y		H						H	H		Y	Y		Y	HES	2009
WE_35_2619	N	WE_35_1113								P						GES	2015

Garavogue Water Management Unit Action Plan

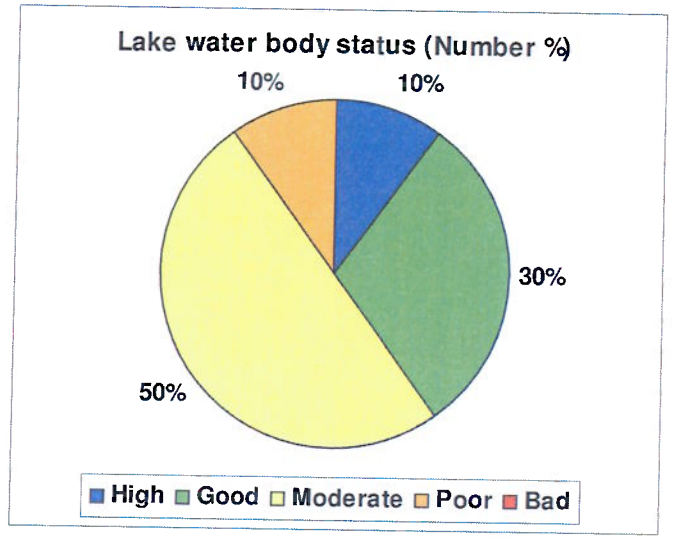
IE_WE_Garravogue																	
			Biological Elements				Supporting Elements					Protected Areas					
Member State Code	Monitored Y (Extrapolated N)	Donor Waterbody	Macroinvertebrates (Q)	FreshWater Pearl Mussel	Fish	Phytobenthos (Diatoms)	Morphology	Specific Polutants	Physio-chemical	Ecological Status	Chemical Status	Special Area of Conservation	Special Protection Area	Nutrient Sensitive Waters	Drinking Water	Objective	Date objective to be achieved
WE_35_2669	N	WE_35_938								P		Y	Y			GES	2021
WE_35_2713	N	WE_35_2996								H		Y				HES	2009
WE_35_2717	N	WE_35_2996								H						HES	2009
WE_35_2725	N	WE_35_2996								H						HES	2009
WE_35_2729	N	WE_35_2013								G						GES	2009
WE_35_274	Y		G							G						GES	2009
WE_35_2753	Y		M							M						GES	2015
WE_35_2797	Y		H							H						HES	2009
WE_35_2798	Y		G							G		Y				GES	2009
WE_35_2817	Y		H							H						HES	2009
WE_35_2887	N	WE_35_1444								G		Y				GES	2009
WE_35_2893	N	WE_35_1113								P		Y	Y			GES	2015
WE_35_2903	N	WE_35_3842								G		Y				GES	2009
WE_35_2954	N	WE_34_3552								H						HES	2009
WE_35_2990	N	WE_35_3493								H		Y				HES	2009
WE_35_2996	Y		H							H		Y				HES	2009
WE_35_3046	N	WE_35_3346								G						GES	2009
WE_35_3311	N	WE_35_2013								G		Y	Y			GES	2009
WE_35_3327	Y		G						H	G			Y			GES	2009
WE_35_3346	Y		G							G		Y				GES	2009
WE_35_3475	N	WE_35_4065								G						GES	2009
WE_35_3479	N	WE_35_1412								H					Y	HES	2009
WE_35_3483	N	WE_35_1113								P						GES	2015
WE_35_3493	Y		H							H		Y				HES	2009
WE_35_3587	N	WE_35_1412								H			Y			HES	2009
WE_35_3628	N	WE_35_1113								P		Y				GES	2015
WE_35_3630	N	WE_35_274								G		Y				GES	2009
WE_35_3797	N	WE_35_1444								G						GES	2009
WE_35_3837	N	WE_35_1412								H		Y				HES	2009
WE_35_3842	Y		G						H	G		Y				GES	2009

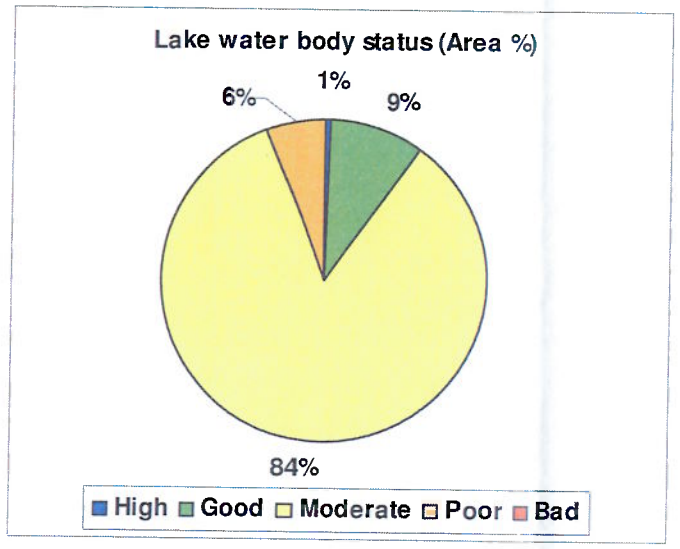
Garavogue Water Management Unit Action Plan

IE_WE_Garravogue																	
			Biological Elements				Supporting Elements					Protected Areas					
Member State Code	Monitored Y (Extrapolated N)	Donor Waterbody	Macroinvertebrates (Q)	FreshWater Pearl Mussel	Fish	Phytobenthos (Diatoms)	Morphology	Specific Polutants	Physio-chemical	Ecological Status	Chemical Status	Special Area of Conservation	Special Protection Area	Nutrient Sensitive Waters	Drinking Water	Objective	Date objective to be achieved
WE_35_3844	N	WE_34_3552								H		Y				HES	2009
WE_35_3906	N	WE_35_1444								G					Y	GES	2009
WE_35_4060	N	WE_35_207								M			Y			GES	2021
WE_35_4062	N	WE_35_1444								G						GES	2009
WE_35_4065	Y		G							G		Y				GES	2009
WE_35_4140	Y		G						G	G						GES	2009
WE_35_4183	Y		H				G		G	G		Y			Y	GES	2009
WE_35_4205	N	WE_35_1444								G						GES	2009
WE_35_532	N	WE_35_1662								G			Y			GES	2009
WE_35_601	N	WE_35_636								M		Y	Y			GES	2015
WE_35_636	Y		M						H	M			Y			GES	2021
WE_35_784	N	WE_35_1495								P		Y	Y			GES	2021
WE_35_801	N	WE_35_1444								G						GES	2009
WE_35_826	N	WE_35_3327								G		Y	Y			GES	2009
WE_35_864	N	WE_35_636								M		Y				GES	2021
WE_35_917	N	WE_35_1113								P		Y				GES	2015
WE_35_965	N	WE_35_3842								G		Y			Y	GES	2009
WE_35_966	Y		H							H						HES	2009

Garavogue Water Management Unit Action Plan

Status of lake water bodies within WMU





IE_WE_Garravogue																		
			Biological Elements			Supporting Elements					Protected Areas							
Member State Code	Name	Monitored Y (Extrapolated N)	Macrophytes	Chlorophyll	Fish	Morphology	Nutrient Enrichment	Physico Chemical	Ecological Status	Chemical Status	Special Area of Conservation	Special Protection Area	Nutrient Sensitive Waters	Bathing Water	Drinking Water	Objective	Date objective to be achieved
WE_35_131	Anarry (Lough)	Y	G	H			M	M	M							GES	2015
WE_35_139	Glencar Lough	Y	H	H			G	G	G		Y					GES	2009
WE_35_142	Carrigeencor Lough	Y	G			G			G							GES	2009
WE_35_155	Belhavel Lough	Y	P	M			M	M	P							GES	2021
WE_35_156	Glenade Lough	Y	G	H			G	G	M		Y					GES	2015
WE_35_158	Gill (Lough)	Y	M	H	M		G	G	M		Y					GES	2015
WE_35_17	Kilsellagh	Y	M	H			G	G	M						Y	GES	2015
WE_35_188	Nacroagh (Lough)	N							M						Y	GES	2015
WE_35_96	Lackagh Lough	N							G		Y				Y	GES	2009
WE_35_98	Kip (Lough)	N							H		Y					HES	2009

Habitats Directive Screening Report for the Strandhill Mini-Plan – Variation No. 1 of the Sligo County Development Plan 2011-2017

Prepared by
Siobhán Ryan
Heritage Officer
Sligo County Council

25 October 2013

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1 Introduction

1.1 Background and Legislative Context

Sligo County Council has prepared a variation of the Sligo County Development Plan 2011-2017 (CDP) by incorporating a mini-plan for the village of Strandhill (replacing the Strandhill Local Area Plan 2003-2012) as Chapter 44 in Volume 2 Mini-Plans of the CDP. The mini-plan stes out the planning strategy for Strandhill. The variation was adopted by Sligo County Council on 7 October 2013.

An important aspect of the Development Plan is how the Plan may impact on European Sites designated for nature conservation, i.e. Special Areas of Conservation (SAC) and Special Protection Areas (SPA). Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora, better known as "The Habitats Directive", provides legal protection for habitats and species of European importance. Articles 3 to 9 provide the legislative means to protect habitats and species of Community interest through the establishment and conservation of an EU-wide network of sites known as Natura 2000. These are SACs and SPA's designated under the Habitats Directive and Birds Directive (Conservation of Wild Birds Directive (79/409/ECC)).

In accordance with the requirements set out under section 177 of the Planning and Development (Amendment) Act 2010 and in the EU Habitats Directive (43/92/EEC) and EU Birds Directive (79/409/EEC), the impacts of the policies and objectives of all statutory land use plans, on certain sites that are designated for the protection of nature (Natura 2000 sites[1]), must be assessed as an integral part of the process of drafting of the plan. This is to determine whether or not the implementation of the proposed plan and its policies could have negative consequences for the habitats or plant and animal species for which these sites are designated. This assessment process is called an Appropriate Assessment (AA) and must be carried out on all stages of the plan making process including the final Plan as adopted.

Natura Impact Reports were completed for the draft Strandhill mini-plan (Appendix A) and for the draft Strandhill mini-plan proposed amendments (Appendix B). The results of those assessments were referred to the statutory authorities and were also made available during each of the relevant public consultation periods.

This report provides an assessment of the final mini-plan which was adopted by Sligo County Council at its meeting on the 10 October 2013 and concludes with an Appropriate Assessment Screening Conclusion Statement. It should be read in conjunction with the final Strandhill mini-plan as adopted by Sligo County Council on 10 October 2013.

Articles 6(3) and 6(4) of the Habitats Directive set out the decision-making tests for plans and projects likely to affect Natura 2000 sites. Article 6(3) establishes the requirement for Appropriate Assessment (AA):

> Article 6(3): *"Any plan or project not directly connected with or necessary to the management of the [Natura 2000] site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subjected to an appropriate assessment of its*

[1] Natura 2000 sites include Special Areas of Conservation designated under the Habitats Directive and Special Protection Areas designated under the Birds Directive. Special Areas of Conservation are sites that are protected because they support particular habitats and/or plant and animal species that have been identified to be threatened at EU community level. Special Protection Areas are sites that are protected for the conservation of species of birds that are in danger of extinction, or are rare or vulnerable. Special Protection Areas may also be sites that are particularly important for migratory birds. Such sites include internationally important wetlands.

implications for the site in view of the site's conservation objectives. In light of the conclusions of the assessment of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public."

Article 6(4): *"If, in spite of a negative assessment of the implications for the site and in the absence of alternative solutions, a plan or project must nevertheless be carried out for imperative reasons of overriding public interest, including those of a social or economic nature, Member States shall take all compensatory measures necessary to ensure that the overall coherence of the Natura 2000 is protected. It shall inform the Commission of the compensatory measures adopted. Where the site concerned hosts a priority natural habitat type and/or a priority species the only considerations which may be raised are those relating to human health or public safety, to the beneficial consequences of primary importance for the environment or, further to an opinion from the Commission, to other imperative reasons of overriding public interest."*

This document provides a record of the Appropriate Assessment process for the Strandhill Mini-Plan Variation no. 1 of the Sligo County Development Plan 2011-2017, as adopted by Sligo County Council on 7 October 2013.

1.2 Stages of the Appropriate Assessment

This document has been prepared in accordance with the European Commission Environment DG document *"Assessment of plans and projects significantly affecting Natura 2000 sites: Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC"*, referred to as the "EC Article 6 Guidance Document". The guidance document provides a non-mandatory methodology for carrying out assessments required under Article 6(3) and (4) of the Habitats Directive, and is viewed as an interpretation of the EU Commission's document *"Managing Natura 2000 sites: The Provisions of Article 6 of the Habitats Directive 92/43/EEC", referred to as "MN2000"*. In addition, *"Appropriate Assessment Guidance for Planning Authorities"* was published by the Department of the Environment, Heritage and Local Government in December 2009 (DEHLG, 2009) and amended in March 2010. Cognisance has been taken of this document in carrying out this assessment. In complying with the obligations under Article 6(3) and with reference to the guidance documents mentioned above, this AA has been broadly structured as follows:

1) Stage 1 – Screening for Appropriate Assessment

- Description of the plan;
- Identification of relevant Natura 2000 sites potentially affected;
- Identification and description of individual and cumulative impacts likely to result from implementation of the Plan;
- Assessment of the significance of the impacts identified above on site integrity. Exclusion of sites where it can be objectively concluded that there will be no significant effects.

2) Stage 2 –Appropriate Assessment

- Description of the Natura 2000 sites that will be considered further in the AA;
- Description of significant impacts on the conservation features of these sites likely to occur from the Plan;
- Mitigation Measures; and

- Conclusions.

3) Stage 3 – Assessment of Alternative Solutions

4) Stage 4 – Assessment where no alternative solutions exist and where adverse impacts remain (Imperative Reasons of Overriding Public Interest and Compensation Measures)

The Habitats Directive promotes a hierarchy of avoidance, mitigation and compensatory measures. In the first instance, the Plan should aim to avoid any negative impacts on European sites by identifying possible impacts early in the plan-making, and writing the plan in order to avoid such impacts. Following that, mitigation measures should be applied, if necessary, during the AA process to the point where no adverse impacts on the site(s) remain. If the Plan is still likely to result in adverse effects, and no further practicable mitigation is possible, then it is rejected. If no alternative solutions are identified and the Plan is required for imperative reasons of overriding public interest (IROPI test) under Article 6(4) of the Habitats Directive, then compensation measures are required for any remaining adverse effect.

1.3 Terminology

A number of different terms have been used in the recent past to describe the process and outputs associated with Article 6(3) of the Habitats Directive. These include Appropriate Assessment (AA), Habitats Directive Assessment (HDA), Habitats Directive Assessment Report, Natura Impact Statement (NIS), Natura Impact Report (NIR).

In an effort to provide consistency and transparency in the planning process and to come into line with the terminology used in the most recent DEHLG guidance, it has been decided to use just two terms throughout this document.

For the purposes of this report the following terms have been adopted:

- **Appropriate Assessment (AA)** has been used to refer to the process and includes the various stages outlined in Section 1.2 above.
- **Natura Impact Report (NIR)** has been used to refer to the output from the AA process and includes the information necessary for the competent authority to carry out an appropriate assessment of the implications of the Plan.

It should also be noted that the Sligo County Development Plan 2011-2017 also uses the term Habitats Directive Assessment (HDA) in addition to the term Appropriate Assessment to describe the process and outputs associated with Article 6(3) of the Habitats Directive. These terms are used interchangeably throughout the Sligo County Development Plan 2011-2017.

2 METHODOLOGY

2.1 Approach

Appropriate Assessment of the adopted mini-plan was undertaken and the findings of the assessment are presented in this Habitats Directive Screening Report. The approach taken in making the assessment follows *European Communities, Assessment of plans and projects significantly affecting Natura 2000 sites, Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC, 2002*, and on *Local Government and Appropriate Assessment of Plans and Projects in Ireland, Guidance for Planning Authorities, 2009*.

2.2 Data Sources

The appropriate assessment of potential impacts on the integrity of Natura 2000 sites in this Habitats Directive Screening Report is based on a desktop review of information relating to these sites and to the habitats and species that they support. References and data used are cited in the back of this report.

2.3 Consultation

This report will be published and placed on public display with the adopted Mini-Plan.

STAGE 1 – SCREENING FOR APPROPRIATE ASSESSMENT

3.1 Description of the Plan

A total of 18 Proposed Amendments to the Draft Strandhill Mini-Plan / Variation No. 1 of the Sligo County Development Plan 2011-2017 were subject to public consultation for four weeks between the 1st and the 28th August 2013.

The Proposed Amendments were assessed (Appropriate Assessment) for potential environmental effects after the Planning Authority had determined the need for such an assessment, in accordance with the requirements of Section 13(6)(aa) of the Planning and Development Act 2000 (as amended).

The outcome of the AA assessment was presented in the *Natura Impact Report for the Proposed Amendments to the Draft Variation / Strandhill Mini-Plan.*

The conclusion of the assessment was that **the Draft Variation/Mini-Plan, if adopted with the proposed amendments A-11 and A-17, was likely to have adverse effects on Natura 2000 sites.**

The Natura Impact Report relating to the Proposed Amendments accompanied the Proposed Amendments on public display.

Of the three submissions received during the public consultation period, the one received from the EPA agreed with the conclusion of the Natura Impact Report on the proposed amendments, which recommended that the proposed amendments A-11 and A-17 should not be included as part of the CDP Variation / Strandhill Mini-Plan.

The Second Manager's Report on submissions relating to the Proposed Amendments re-emphasised the conclusion of the Natura Impact Report and reiterated the recommendations with regard to the proposed amendments A-11 and A-17.

On 7 October 2013, the elected members of Sligo County Council considered the following documents:

- the *Draft Strandhill Mini-Plan / Variation No. 1 of the Sligo County Development Plan 2011-2017*
- *the Natura Impact Report for the Draft Strandhill Mini-Plan / Variation No. 1 of the Sligo County Development Plan 2011-2017*
- the *Proposed Amendments of the Draft CDP Variation No. 1 / Strandhill Mini-Plan*
- the *Addendum I to the SEA Screening Report - Environmental Consequences of the Proposed Amendments to the Draft Variation / Strandhill Mini-Plan*
- the *Natura Impact Report for the Proposed Amendments to the Draft Variation / Strandhill Mini-Plan*
- the *Second Manager's Report on Submissions and Observations Received in Relation to the Proposed Amendments to the Draft Variation / Strandhill Mini-Plan.*

The elected members of Sligo County Council decided to adopt the CDP Variation No. 1 / Strandhill Mini-Plan **without the proposed amendments A-11 and A-17.**

3.2 Screening of Amendments

Of the 18 proposed amendments considered by Sligo County Council in October 2013, 16 of the amendments were adopted without modifications. The Natura Impact Report for the Proposed

Amendments to the Draft Strandhill Mini-Plan/Variation of Sligo County Development Plan 2011-2017 concluded that for the 16 amendments adopted, there was no potential for effects on Natura 2000 sites.

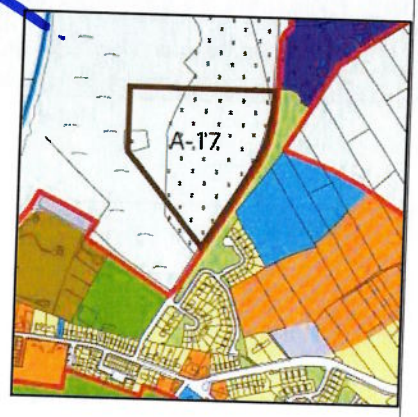
Two proposed amendments, A-11 and A-17, were not adopted by Sligo County Council as part of the CDP Variation No.1.Strandhill Mini-Plan. Rejected amendments are set out in Table 3 below. Consideration of the potential for these final changes to give rise to impacts on any Natura 2000 site is assessed below.

3.3 Sites Screened

All Natura 2000 sites within the impact zone of the mini-plan were screened to determine whether rejected amendments A-11 and A-17 had the potential to give rise to impacts on the sites (see Tables 1 and 2). No additional sites were identified to be screened in relation to the rejected amendments. Table 3 below lists the amendments rejected by Sligo County Council at its meeting on the 10 October 2013 when the mini-plan was adopted. Preliminary consideration of the potential for the rejected amendments to give rise to impacts on Natura 2000 sites is set out in column three of Table 3.

Table 1: **Possible Impacts on SACs**

Site Name	Reduction in Habitat Area	Disturbance to Key Species	Habitats or Species Fragmentation	Reduction in Species Density	Changes in Key Indicators of Conservation Value (Water Quality etc.)
Streedagh Point Dunes	None	None	None	None	None
Ben Bulben, Gleniff and Glende Complex	None	None	None	None	None
Lough Gill	None	None	None	None	None
Union Wood	None	None	None	None	None
Unshin River	None	None	None	None	None
Temple House and Cloonacleigha Loughs	None	None	None	None	None
River Moy	None	None	None	None	None
Ox Mountain Bogs	None	None	None	None	None
Knockalongy and Knockachree Cliffs	None	None	None	None	None
Ballysadare Bay	None	None	None	None	None
Cummeen Strand/Drumcliff Bay	None	None	None	None	None

Ref.	Rejected Amendments - Elected Members	Potential for impact on Natura 2000 Sites
A-17 (linked to A-11)	~~Change the zoning of the site marked A-17 on the Proposed Amendments Map from 'buffer zone' to 'community, sports and recreation'~~  ~~[Note: the zoning category would be CF- community facilities, as per the Zoning Matrix included in the CDP]~~	None

3.4 **Screening Outcome**

On the basis of the above, it is concluded that there is no potential for the rejection of the amendments A-11 and A-17 to give rise to impacts on any Natura 2000 sites.

Rejected Amendment Proximity WWTP Whorl Snail

Table 2: **Possible Impacts on SPAs**

Site Name	Reduction in Habitat Area	Disturbance to Key Species	Habitats or Species Fragmentation	Reduction in Species Density	Changes in Key Indicators of Conservation Value (Water Quality etc.)
Ardboline Island and Horse Island	None	None	None	None	None
Ballintemple and Ballygilgan	None	None	None	None	None
Drumcliff Bay	None	None	None	None	None
Sligo/Leitrim Uplands	None	None	None	None	None
Cummeen Strand	None	None	None	None	None
Ballysadare Bay	None	None	None	None	None
Aughris Head	None	None	None	None	None

Table 3 Rejected Amendments agreed by Sligo County Council (7 Oct 2013) and preliminary screening

Ref.	Rejected Amendments - Elected Members	Potential for impact on Natura 2000 Sites
A-11 **(linked to A-17)**	In **Section 44.6 Community facilities**, insert an additional **objective D** as follows: ~~***D. Land west of Airport Road, including pine plantation***~~ ~~*Sligo County Council owns most of the land and the pine plantation to the west of the Airport Road. Within the Southern portion of the afforested area (16.5 acres / 6.7 ha) it is an objective to accommodate sports and recreation, including any ancillary developments such as dressing rooms etc.*~~ ~~*Therefore the County Council owned lands to the west of the Airport Road are zoned for 'Community, Sport & Recreation' to meet this objective and public access will be retained & enabled to continue.*~~	**None**

Finding of No Significant Effects Report Matrix

Screening Conclusion Statement for CDP Variation No. 1/Strandhill Mini-Plan

CDP Variation No. 1/Strandhill Mini-Plan FONSE Report Matrix	
Name and Location of Natura 2000 sites subject to screening for appropriate assessment	Cummeen Strand/Drumcliff Bay (Site Code 000627)
Description of the plan	Sligo County Council has prepared a variation the Sligo County Development Plan 2011-2017 (CDP) by incorporating a mini-plan for the village of Strandhill (replacing the Strandhill Local Area Plan 2003-2012) as Chapter 44 in Volume 2 Mini-Plans of the CDP. The mini-plan sets out the planning strategy for Strandhill. The plan was adopted by Sligo County Council on 7 October 2013.
Is the plan directly connected with or necessary to the management of the Natura 2000 sites identified above	No
Are there other projects or plans that together with the amendments being assessed could affect the site (provide details)	There is continuous pressure to increase development around Strandhill. This is promoted through a range of plans including the Sligo County Development Plan 2011-2017. Many of these plans could give rise to projects which result in increased pressure on water quality, pressure to infill and to reclaim parts of the shoreline; to increase recreational marine activity, as well as recreational activity along the shoreline. Any such projects could contribute to habitat loss and give rise to significant disturbance to habitats and species when considered cumulatively.
Assessment of Significant Effects	
Describe how the plan (alone or in combination is likely to affect Natura 2000 sites)	There are two Natura 2000 sites located within the boundary of the Strandhill mini-plan, and there are no policies/objectives contained in the plan which will give rise to direct loss of habitat within any designated site. A number of potentially negative impacts were identified during the

	screening of the draft plan and its associated amendments. These are set out below: A Natura Impact Report of the draft plan identified a series of objectives which required amendments to ensure that any potential for effects on Natura 2000 sites would be appropriately mitigated. (See Natura Impact Report of the draft plan in Appendix A of this document) A Natura Impact Report undertaken of the proposed amendments to the draft plan identified potential negative impacts on Natura 2000 sites arising from proposed amendments A-11 and A-17. (see Natura Impact Report of the draft plan in Appendix B of this document).
Explain why these effects are not considered significant	The plan as adopted by Sligo County Council in October 2013 incorporates all proposed mitigation measures identified in the Natura Impact Report undertaken on the draft plan. The plan as adopted by Sligo County Council in October 2013 excluded amendments A-11 and A-17, which were identified in the Natura Impact Report as potentially having a significant negative effect on a Natura 2000 site within the plan area.
List of agencies consulted	The draft Strandhill Mini-Plan and proposed amendments to same, as well as the Appropriate Assessment Natura Impact Reports for both documents were referred to all of the statutory consultees including the EPA, the Minister for Arts, Heritage, Gaeltacht and the Islands, and An Taisce during two public consultation phases.
Response to consultation	The EPA responded to notifications at all stages of consultation, making specific comments and suggestions, which were taken into account in the preparation of SEA and AA reports as well as in the drafting of Manager's recommendations to elected members. The DAHG and Leitrim County Council aslo made contributions supporting the position of the Planning Authority with regard to those proposed amendments which would have had potential for singificant environmental effects, if adopted.
Data Collected To Carry Out The Assessment	
Who carried out the assessment	Siobhán Ryan, Heritage Officer, Sligo County Council.
Sources of data	National Parks and Wildlife Service Site Synopses and other data relating to Natura 2000 sites.

el of assessment completed	Screening
Where can the full results of the assessment be accessed and viewed	This report, the Natura Impact Report for the draft Strandhill Mini-Plan (February 2013), and the Natura Impact Report for the proposed Amendments to the Strandhill Mini- Plan (August 2013).
Date Assessment Completed	25 October 2013

5.0 Relevant Documents and References

Draft Strandhill Mini-Plan / Variation No. 1 of the Sligo County Development Plan 2011-2017

Natura Impact Report for the Draft Strandhill Mini-Plan / Variation No. 1 of the Sligo County Development Plan 2011-2017 [February 2013]

Proposed Amendments of the Draft CDP Variation No. 1 / Strandhill Mini-Plan

Natura Impact Report for the Proposed Amendments to the Draft Strandhill Mini-Plan / Variation No. 1 of the Sligo County Development Plan 2011-2017 [August 2013]

Second Manager's Report on Submissions and Observations Received in Relation to the Proposed Amendments to the Draft Variation / Strandhill Mini-Plan.

Environment, Heritage and Local Government, National Parks and Wildlife Service. 2008. The Status of EU Protected Habitats and Species in Ireland.

Environment, Heritage and Local Government, National Parks and Wildlife Service. Various Years. Natura 2000 Site Synopses.

Environment, Heritage and Local Government. 2009. Appropriate Assessment of Plans and Projects in Ireland. Guidance for Planning Authorities.

European Communities. 2000. Managing Natura 2000 sites. The provisions of Article 6 of the Habitats Directive 92/43/EEC. Luxemburg.

European Communities. 2002. Assessment of plans and projects significantly affecting Natura 2000 sites. Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC. Luxemburg.

Appendix A

Natura Impact Report for the Proposed variation No. 1 (Strandhill Mini-Plan) of the Sligo County Development Plan 2011-2017

Prepared by the Heritage Office of Sligo County Council

5 February 2013

INTRODUCTION

1.1 Background and Legislative Context

Sligo County Council intends to vary the Sligo County Development Plan 2011-2017 (CDP) by incorporating a mini-plan for the village of Strandhill (replacing the Strandhill Local Area Plan 2003-2012) as Chapter 44 in Volume 2 Mini-Plans of the CDP.

An important aspect of the Development Plan is how the Plan may impact on European Sites designated for nature conservation, i.e. Special Areas of Conservation (SAC) and Special Protection Areas (SPA). Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora, better known as "The Habitats Directive", provides legal protection for habitats and species of European importance. Articles 3 to 9 provide the legislative means to protect habitats and species of Community interest through the establishment and conservation of an EU-wide network of sites known as Natura 2000. These are SACs and SPA's designated under the Habitats Directive and Birds Directive (Conservation of Wild Birds Directive (79/409/ECC)).

In accordance with the requirements of the EU Habitats Directive (43/92/EEC) and EU Birds Directive (79/409/EEC), the impacts of the policies and objectives of all statutory land use plans on certain sites that are designated for the protection of nature (Natura 2000 sites[2]), must be assessed as an integral part of the process of drafting of the plan. This is to determine whether or not the implementation of plan policies could have negative consequences for the habitats or plant and animal species for which these sites are designated. This assessment process is called an Appropriate Assessment (AA) and must be carried out on all stages of the plan making process.

Articles 6(3) and 6(4) of the Habitats Directive set out the decision-making tests for plans and projects likely to affect Natura 2000 sites (Annex 1.1). Article 6(3) establishes the requirement for Appropriate Assessment (AA):

> Article 6(3): *"Any plan or project not directly connected with or necessary to the management of the [Natura 2000] site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subjected to an appropriate assessment of its implications for the site in view of the site's conservation objectives. In light of the conclusions of the assessment of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public."*
>
> Article 6(4): *"If, in spite of a negative assessment of the implications for the site and in the absence of alternative solutions, a plan or project must nevertheless be carried out for imperative reasons of overriding public interest, including those of a social or economic nature, Member States shall take all compensatory measures necessary to ensure that the overall coherence of the Natura 2000 is protected. It shall inform the Commission of the compensatory measures adopted. Where the site concerned hosts a priority natural habitat type and/or a priority species the only considerations which may be raised are those relating*

[2] Natura 2000 sites include Special Areas of Conservation designated under the Habitats Directive and Special Protection Areas designated under the Birds Directive. Special Areas of Conservation are sites that are protected because they support particular habitats and/or plant and animal species that have been identified to be threatened at EU community level. Special Protection Areas are sites that are protected for the conservation of species of birds that are in danger of extinction, or are rare or vulnerable. Special Protection Areas may also be sites that are particularly important for migratory birds. Such sites include internationally important wetlands.

to human health or public safety, to the beneficial consequences of primary importance for the environment or, further to an opinion from the Commission, to other imperative reasons of overriding public interest."

This document provides a record of the Appropriate Assessment process for the proposed variation No. 1 Strandhill Mini-Plan of the Sligo County Development Plan 2011-2017.

Sligo County Development Plan 2011-2017

Sligo County Development Plan came into force on 13 June 2011. It will remain operational for a period of maximum six years. The Plan sets out the Council's policies and objectives for the proper planning and sustainable development of the County of Sligo.

The undertaking of Appropriate Assessment (AA) is mandatory in the case of development plans. The AA of the CDP 2011-2017 was undertaken by environmental consultants CAAS on behalf of Sligo County Council. The resultant Appropriate Assessment Screening Report was published alongside the CDP 2011-2017.

The Appropriate Assessment informed the policies and objectives of the Plan and also suggested appropriate mitigation measures, which were incorporated in to the relevant chapters of the Plan upon its adoption in 2011.

This Natura Impact Report should be read in conjunction with the CDP 2011-2017 and the associated Appropriate Assessment Screening Report.

Sligo CDP and its associated Appropriate Assessment Screening Report are available at www.sligococo.ie/cdp.

1.2 Stages of the Appropriate Assessment

This document has been prepared in accordance with the European Commission Environment DG document *"Assessment of plans and projects significantly affecting Natura 2000 sites: Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC"*, referred to as the "EC Article 6 Guidance Document". The guidance document provides a non-mandatory methodology for carrying out assessments required under Article 6(3) and (4) of the Habitats Directive, and is viewed as an interpretation of the EU Commission's document *"Managing Natura 2000 sites: The Provisions of Article 6 of the Habitats Directive 92/43/EEC", referred to as "MN2000"*. In addition, *"Appropriate Assessment Guidance for Planning Authorities"* was published by the Department of the Environment, Heritage and Local Government in December 2009 (DEHLG, 2009) and amended in March 2010. Cognisance has been taken of this document in carrying out this assessment. In complying with the obligations under Article 6(3) and with reference to the guidance documents mentioned above, this AA has been broadly structured as follows:

1) Stage 1 – Screening for Appropriate Assessment

- Description of the plan;
- Identification of relevant Natura 2000 sites potentially affected;
- Identification and description of individual and cumulative impacts likely to result from implementation of the Plan;

- Assessment of the significance of the impacts identified above on site integrity. Exclusion of sites where it can be objectively concluded that there will be no significant effects.

2) Stage 2 –Appropriate Assessment

- Description of the Natura 2000 sites that will be considered further in the AA;
- Description of significant impacts on the conservation features of these sites likely to occur from the Plan;
- Mitigation Measures; and
- Conclusions.

The Habitats Directive promotes a hierarchy of avoidance, mitigation and compensatory measures. In the first instance, the Plan should aim to avoid any negative impacts on European sites by identifying possible impacts early in the plan-making, and writing the plan in order to avoid such impacts. Following that, mitigation measures should be applied, if necessary, during the AA process to the point where no adverse impacts on the site(s) remain. If the Plan is still likely to result in adverse effects, and no further practicable mitigation is possible, then it is rejected. If no alternative solutions are identified and the Plan is required for imperative reasons of overriding public interest (IROPI test) under Article 6(4) of the Habitats Directive, then compensation measures are required for any remaining adverse effect.

4.1 Terminology

A number of different terms have been used in the recent past to describe the process and outputs associated with Article 6(3) of the Habitats Directive. These include Appropriate Assessment (AA), Habitats Directive Assessment (HDA), Habitats Directive Assessment Report, Natura Impact Statement (NIS), Natura Impact Report (NIR).

In an effort to provide consistency and transparency in the planning process and to come into line with the terminology used in the most recent DEHLG guidance, it has been decided to use just two terms throughout this document.

For the purposes of this report the following terms have been adopted:

- **Appropriate Assessment (AA)** has been used to refer to the process and includes the various stages outlined in Section 1.2 above.

- **Natura Impact Report (NIR)** has been used to refer to the output from the AA process and includes the information necessary for the competent authority to carry out an appropriate assessment of the implications of the Plan.

It should also be noted that the Sligo County Development Plan 2011-2017 also uses the term Habitats Directive Assessment (HDA) in addition to the term Appropriate Assessment to describe the process and outputs associated with Article 6(3) of the Habitats Directive. These terms are used interchangeably throughout the Sligo County Development Plan 2011-2017.

2.1 Approach

Appropriate Assessment of the draft Mini-Plan was undertaken and the findings of the assessment are presented in this Natura Impact Report. The approach taken in the making of this assessment follows *European Communities, Assessment of plans and projects significantly affecting Natura 2000 sites, Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC, 2002*, and on *Local Government and Appropriate Assessment of Plans and Projects in Ireland, Guidance for Planning Authorities, 2009*. As the Mini-Plan is progressed through the plan making process the appropriate assessment process will continue in tandem and will inform the decision making process in terms of any likely significant impacts arising from the Mini-Plan on Natura 2000 sites.

2.2 Data Sources

The appropriate assessment of potential impacts on the integrity of Natura 2000 sites in this report is based on a desktop review of information relating to these sites and to the habitats and species that they support. References and data used are cited in the back of this report.

2.3 Consultation

This report will be placed on public display with the draft Mini-Plan and will be referred to Government Departments and other statutory consultees for consideration during the consultation process. Submissions on same will be taken into consideration in the drafting of the final plan and accompanying Natura Impact Report.

STAGE 1 – SCREENING FOR APPROPRIATE ASSESSMENT

3.1 Description of the Plan

3.1.1 Main Goal – Consolidation

The Draft Strandhill Mini-Plan promotes sustainable development at a local level through the balanced allocation of land to various uses and through objectives aimed at protecting the natural and built heritage.

The Mini-Plan seeks the consolidation and sustainable development of the area to cater for the needs of the settlement's population, its seasonal visitors and the inhabitants of the surrounding area.

In addition to the existing general policies in Chapters 3 to 12 of the CDP, and the Mini-Plan policies contained in Chapter 13, the Strandhill Mini-Plan contains detailed objectives applicable to specific areas in the village.

The Mini-Plan provides an overview of Strandhill under the following headings:

- Village profile
- Population and housing
- Community facilities
- Commercial and enterprise development
- Infrastructure
- Archaeological heritage
- Natural heritage
- Coastal erosion

3.1.2 Mini-Plan Objectives

The Mini-Plan then provides a suite of objectives in relation to the following themes:

- Landscape, natural heritage and open space
- Coastal protection
- Built heritage, streetscape and building design
- Mixed-use zones
- Transport, circulation and parking
- Community facilities
- Tourism development
- Business and enterprise
- Buffer zone
- Wastewater treatment

Note: All the policies and objectives contained in Chapters 3 to 12 of the CDP are applicable to all settlements in County Sligo. Policies in Chapter 13 are applicable to all mini-plans. These policies and objectives have already been assessed for effects on Natura 2000 Sites through the Appropriate Assessment (AA) process in preparing the CDP 2011-2017.

3.2 Features of the Plan that Could Impact on Natura 2000 Sites

The key aspects of the Plan which could give rise to direct / indirect impacts to Natura 2000 sites will principally be related to zonings, the mini-plan objectives, infrastructural provision and upgrades, coastal protection works, as well as recreational infrastructure and activities.

The main threats to Natura 2000 sites in general arise from the density of population present in the Strandhill area in close proximity to the sites. Human pressure on the sites can be manifested in a number of ways either directly in the form of land take, trampling and disturbance by people themselves; or indirectly, for example, in the form of water quality deterioration resulting from sewage effluent and storm water discharges. The relative importance of these potential impacts will vary from site to site depending on the particular circumstances of the site and of the human pressure in the vicinity.

Related to the mini-plan for Strandhill is the need for adequate recreational facilities and given the strong coastal features in Strandhill this can include provision of recreational infrastructure, promenades etc. If located in or adjacent to a protected site, such developments can have likely significant impacts on Natura 2000 sites. Similarly, provision of footpaths and cycleways within and close to Natura 2000 sites can have predicted and unforeseen negative impacts.

The provision of infrastructure is also a key consideration including wastewater treatment, drainage systems, waste management facilities and coastal protection works. The Natura 2000 sites within the Strandhill Mini-Plan area are all coastal, and may be directly impacted by land take for infrastructural development or through pollution of these sensitive sites; therefore, it is essential that zonings take account of the direct and indirect impacts on Natura 2000 sites particularly where inadequate or insufficient wastewater treatment or drainage may be involved.

3.3 Brief Description of the Natura 2000 Sites

This section of the screening process describes the Natura 2000 sites within a 15km radius of the Mini-Plan area. A 15km buffer zone was chosen as a precautionary measure, to ensure that all potentially affected Natura 2000 sites are included in the screening process (**Figures 1 - 4**). **Table 3.1** (candidate Special Areas of Conservation) and **Table 3.2** (Special Protection Areas) list the Natura 2000 sites that are within 15km of the plan area. The qualifying features for each site have been obtained from the 'SAC Datasheets' available through the NPWS website:

http://www.npws.ie/en/ProtectedSites/SpecialAreasofConservationSACs/.

The standard abbreviated name of each Annex I habitat type is given in **Table 3.1**. The full name of the habitat type and details of its characteristics, distribution in Ireland and its conservation status in Ireland can be found at:

http://www.npws.ie/en/PublicationsLiterature/HabitatsDirectivereport07/Habitats/.

Each qualifying feature also has a standard EU code and these are presented in brackets in **Table 3.1** (e.g. 'Vegetated sea cliffs (1230)' means: 'habitat type 1230 Vegetated sea cliffs of the Atlantic and Baltic Coasts'. Common names and species code are given for Annex II species, e.g. 'Narrowmouthed whorl snail (1014)'.

WWTP



WWTP

Fig. 1 Special Areas of Conservation (orange) within 15km (red circle) of Strandhill.

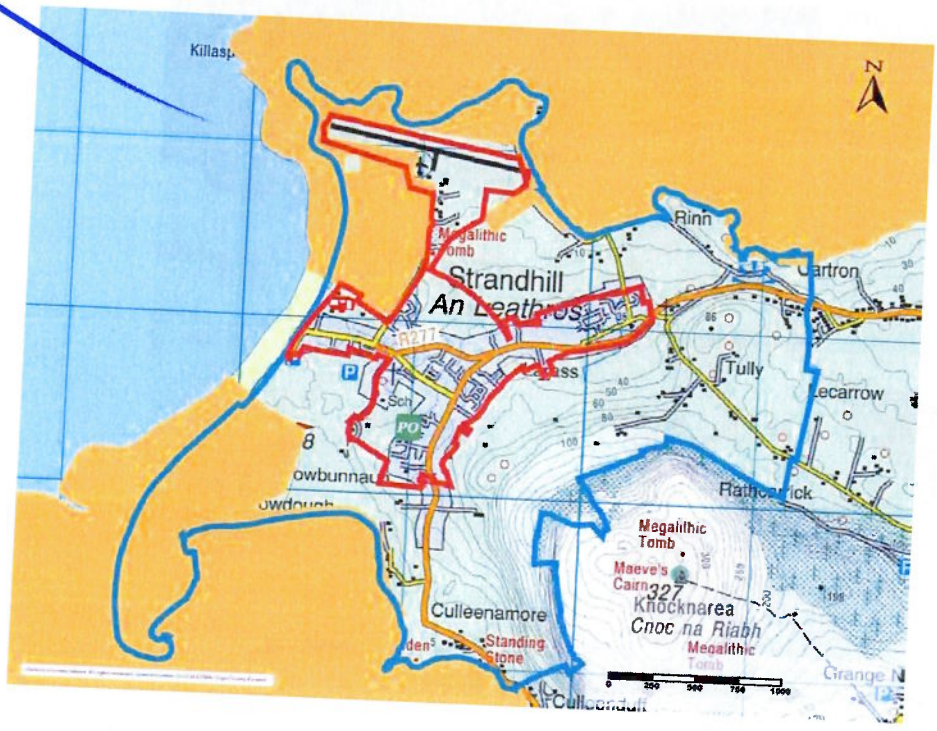


Fig. 2 Special Areas of Conservation immediately adjoining or within the Plan boundary.

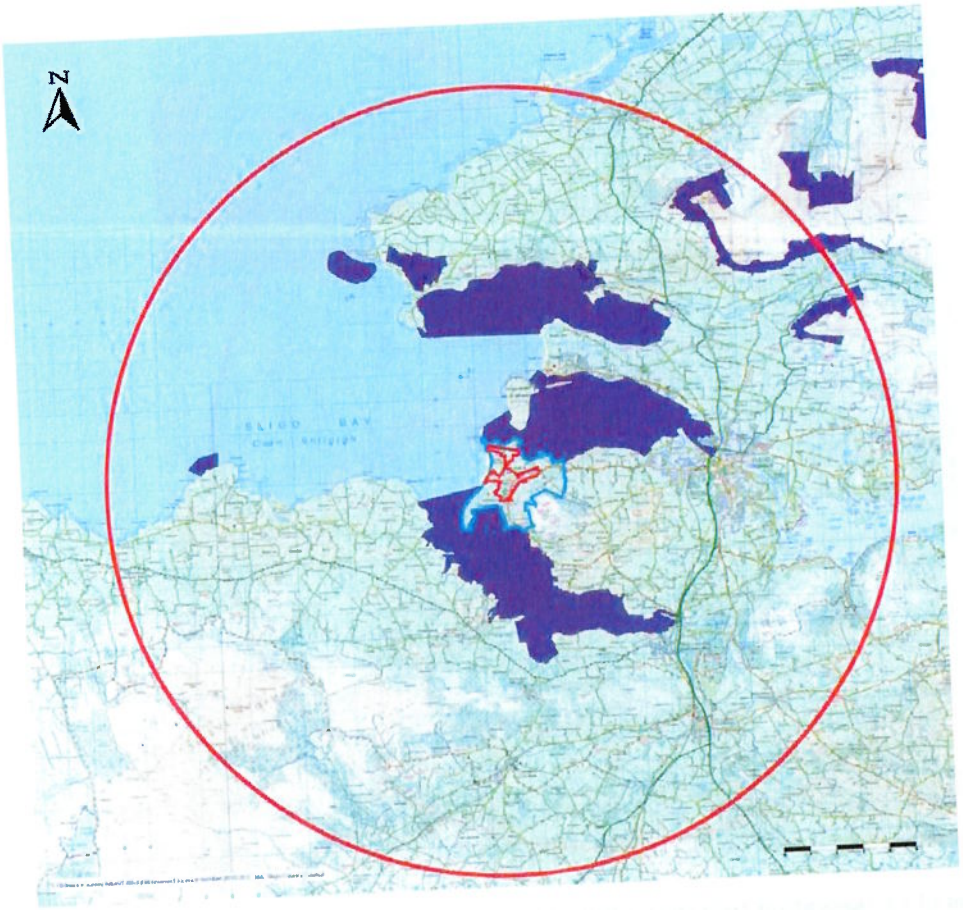


Fig. 3 Special Protection Areas (purple) within 15km (red circle) of Strandhill.



Fig.4 Special Protection Areas immediately adjoining or within the Plan boundary.

3.3.1 Priority Habitats and Species

A number of species and habitats are given 'Priority' status in the Habitats Directive by the EU because they are considered to be particularly vulnerable and are mainly, or exclusively, found within the European Union.

There are no 'Priority Species' currently known from Ireland.

Priority Habitats are present in Ireland and are present within the Natura 2000 Sites adjoining Strandhill. These are prefixed with an asterisk (for example, '*Fixed Dunes (2130)') in **Table 3.1** and in subsequent tables in this report. The importance of Priority Habitat is emphasised at several places in the Directive (Articles 4 and 5 and Annex III), not only in terms of the selection of sites, but also in the measures required for site protection (Article 6).

Table 3.1 cSAC's within 15km of the Strandhill Mini-Plan Area including known threats.

Site Code	Site Name	Qualifying Feature		Documented Potential Threats*
		Annex I Habitat	Annex II Species	
000623	Ben Bulben, Gleniff and Glenade Complex	European dry heaths(4030), Alpine and Boreal heaths(4060), Calcareous rocky slopes with chasmophytic vegetation (8210), Calcareous and calcshist screes of the montane to alpine levels (Thlaspietea rotundifolii) (8120), Juniperus communis formations on heaths or calcareous grasslands(5130), * Petrifying springs with tufa formation (Cratoneurion) (7220), Water courses of plain to montane levels with the Ranunculion fluitantis and Callitricho-Batrachion vegetation(3260).	Lutra Lutra (European Otter) (1355), Vertigo geyeri (Geyer's Whorl Snail) (1013).	Changes in local hydrology including drainage, Direct loss of habitat to development, Arterial drainage/water abstraction/lowering of the regional water table, Introduction of alien invasive species, Peat Extraction, Overgrazing, Forestry, Burning, Agricultural reclamation, Illegal Dumping, Burning.

SPA's MAP

Site Code	Site Name	Qualifying Feature		Documented Potential Threats*
		Annex I Habitat	Annex II Species	
001680	Streedagh Point Dunes	* Fixed coastal dunes with herbaceous vegetation (grey dunes) (2130), Shifting dunes along the shoreline with Ammophila arenaria (white dunes) (2120), Atlantic salt meadows (Glauco-Puccinellietalia maritimae) (1330), Mediterranean salt meadows (Juncetalia maritimi) (1410), Perennial vegetation of stony banks (1220), Mudflats and sandflats not covered by seawater at low tide (1140),	Vertigo angustior (Narrow-mouthed Whorl Snail) (1014).	Agricultural improvements/Reclamation Drainage/Changes in local hydrology including water abstraction, Erosion (natural and anthropogenic), Agricultural abandonment, Overgrazing/undergrazing, Bracken and scrub encroachment, Tourism related development, Decrease in water quality/increased pollution, Direct loss of habitat to development, Tourism related development, Introduction of alien invasive species, Illegal Dumping, Burning, Quarrying/removal of sand, Aquaculture.
001976	Lough Gill	Natural euthrophic lakes with Magnopotamion or Hydrocharition-type vegetation (3150), *Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae) (91E0), Old sessile oak woods with Ilex and Blechnum in British Isles (91A0),	Petromyzon marinus (Sea Lamprey) (1095), Lampetra planeri (Brook Lamprey) (1096), Lampetra fluviatillis (River Lamprey) (1099), Salmo salar (Atlantic Salmon) (1106), Lutra lutra (European Otter) (1355), Autropotamobius pallipes (Freshwater White-clawed Crayfish) (1092).	Decrease in water quality/Increased pollution, Changes in water flow rates Arterial drainage/water abstraction/lowering of the regional water table, Siltation, Loss of fringe vegetation, Changes in seasonal water levels/fluctuations, Direct loss of habitat to development, Loading from effluents(WWTP), Recreation/amenity use Developments – marinas, Introduction of alien invasive species, Illegal Dumping, Crayfish Fishing.
000638	Union Wood	Old sessile oak woods with Ilex and Blechnum in British Isles (91A0).		Direct loss of habitat to development, Amenity/recreational use, Invasive species, Lack of/inappropriate woodland management, Overgrazing (deer), Introduction of alien invasive species, Illegal Dumping, Felling/Removal of Trees.

Site Code	Site Name	Qualifying Feature		Documented Potential Threats*
		Annex I Habitat	Annex II Species	
001898	Unshin River	Water courses of plain to montane levels with the Ranunculion fluitantis and Callitricho-Batrachion vegetation (3260), *Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae) (91E0).	Salmo salar (Atlantic Salmon) (1106), Lutra lutra (European Otter) (1355).	Decrease in water quality/Increased pollution, Changes in water flow rates, Arterial drainage/water abstraction/lowering of the regional water table, Siltation, Loss of fringe vegetation, Changes in seasonal water levels/fluctuations, Direct loss of habitat to development, Loading from effluents(WWTP), Recreation/amenity use, Developments – marinas, Introduction of alien invasive species, Illegal Dumping.
000636	Temple House and Cloonacleigha Loughs	Hard oligo-mesotrophic waters with benthic vegetation of Chara spp., (3140), Water courses of plain to montane levels with the Ranunculion fluitantis and Callitricho-Batrachion vegetation (3260), Degraded raised bogs still capable of natural regeneration (7120), Molinia meadows on calcareous, peaty or clavey-silt-laden soils (Molinion caeruleae) (6410), *Alluvial forests with Alnus glutinosa and Fraxinus excelsior (91E0).		Decrease in water quality/Increased pollution, Changes in water flow rates, Arterial drainage/water abstraction/lowering of the regional water table, Siltation, Loss of fringe vegetation, Changes in seasonal water levels/fluctuations, Direct loss of habitat to development, Loading from effluents(WWTP), Recreation/amenity use, Developments – marinas, Introduction of alien invasive species, Illegal Dumping.
002298	River Moy	*Active raised bogs (7110), Degraded raised bogs still capable of natural regeneration (7120), Depressions on peat substrates of the Rhynchosporion (7150), Old sessile oak woods with Ilex and Blechnum in British Isles (91A0), *Alluvial forests with Alnus glutinosa and Fraxinus excelsior (91E0).	Salmo salar (Atlantic Salmon) (1106), Petromyzon marinus (Sea Lamprey) (1095), Lampetra planeri (Brook Lamprey) (1096), Lutra lutra (European Otter) (1355), Austropotamobius pallipes (Freshwater White-clawed Crayfish) (1092).	Decrease in water quality/Increased pollution, Changes in water flow rates Arterial drainage/water abstraction/lowering of the regional water table, Siltation, Loss of fringe vegetation, Changes in seasonal water levels/fluctuations, Direct loss of habitat to development, Loading from effluents(WWTP), Recreation/amenity use, Developments – marinas, Introduction of alien invasive species, Illegal Dumping, Felling/Removal of Trees, Crayfish Fishing.

Site Code	Site Name	Qualifying Feature		Documented Potential Threats*
		Annex I Habitat	Annex II Species	
002006	Ox Mountain Bogs	Blanket bog (*active only) (7130), Northern Atlantic wet heaths with Erica tetralix (4010), Natural dystrophic lakes and ponds (3160), Oligotrophic waters containing very few minerals of sandy plains (Littorelletalia uniflorae) (3110), Depressions on peat substrates of the Rhynchosporion (7150).	Vertigo geyeri (Geyer's Whorl Snail) (1013).	Changes in local hydrology including drainage, Peat Extraction, Overgrazing, Forestry, Burning, Direct loss of habitat to development Arterial drainage/water abstraction/lowering of the regional water table, Agricultural reclamation, Introduction of alien invasive species Illegal Dumping, Increased pollution/reduction in water quality.
001669	Knockalongy and Knockachree Cliffs	Calcareous rocky slopes with chasmophytic vegetation (8210), Siliceous rocky slopes with chasmophytic vegetation (8220), Northern Atlantic wet heaths with Erica tetralix (4010), Blanket bog (*active only) (7130), Oligotrophic waters containing very few minerals of sandy plains (Littorelletalia uniflorae) (3110),	Trichomanes speciosum (Killarney Fern) (1421).	Changes in local hydrology including drainage, Peat Extraction, Overgrazing, Forestry, Burning, Direct loss of habitat to development, Arterial drainage/water abstraction/lowering of the regional water table, Agricultural reclamation, Introduction of alien invasive species, Illegal Dumping, Increased pollution/reduction in water quality, Quarrying/removal of sand.
000622	Ballysadare Bay	Estuaries (1130), Mudflats and sandflats not covered by seawater at low tide (1140), Embryonic shifting dunes (2110), Shifting dunes along the shoreline with Ammophila arenaria (white dunes) (2120), *Fixed coastal dunes with herbaceous vegetation (grey dunes) (2130), Humid dune slacks (2190),	Phoca Vitulina (Common Seal) (1365), Vertigo angustior (Narrow-mouthed Whorl Snail) (1014).	Decrease in water quality/Increased pollution Development of marinas and ports Disturbance to marine mammals Dumping at sea Direct loss of habitat to development Recreational/amenity use Agricultural improvements/Reclamation Drainage/Changes in local hydrology including water abstraction Erosion (natural and anthropogenic) Agricultural abandonment Overgrazing/undergrazing Bracken and scrub encroachment Tourism related development Introduction of alien invasive species Illegal Dumping Burning Quarrying/removal of sand Aquaculture

Site Code	Site Name	Qualifying Feature		Documented Potential Threats*
		Annex I Habitat	Annex II Species	
000627	Cummeen Strand/Drumcliff Bay	Estuaries (1130), Mudflats and sandflats not covered by seawater at low tide (1140), Embryonic shifting dunes (2110), Shifting dunes along the shoreline with Ammophila arenaria (white dunes) (2120), *Fixed coastal dunes with herbaceous vegetation (grey dunes) (2130), *Petrifying springs with tufa formation (Cratoneurion) (7220), Juniperus communis formations on heaths or calcareous grasslands (5130).	Phoca vitulina (Common Seal) (1365), Vertigo angustior (Narrow-mouthed Whorl Snail) (1014).	Decrease in water quality/Increased pollution Development of marinas and ports Disturbance to marine mammals Dumping at sea Direct loss of habitat to development Recreational/amenity use Agricultural improvements/Reclamation Drainage/Changes in local hydrology including water abstraction Erosion (natural and anthropogenic) Agricultural abandonment Overgrazing/undergrazing Bracken and scrub encroachment Tourism related development Introduction of alien invasive species Illegal Dumping Burning Quarrying/removal of sand Aquaculture

Table 3.2 SPA's within 15km of the Strandhill Mini Plan Area including known threats.

Site Code	Site Name	Qualifying Feature Annex I Species	Documented Potential Threats*
004135	Ardboline Island and Horse Island	Site is selected for: Cormorant, Barnacle Goose. Additional Special Conservation Interests: Corncrake	Direct and indirect impacts to the habitats of the bird species of conservation interests (loss of habitat) Direct loss of habitat to development Water quality/pollution Disturbance including recreation/amenity use Introduction of alien invasive species Illegal Dumping Disturbance from Recreational/amenity use Inappropriate land management
004234	Ballintemple and Ballygilgan	Site is selected for: Barnacle Goose.	Direct and indirect impacts to the habitats of the bird species of conservation interests (loss of habitat) Direct loss of habitat to development Water quality/pollution Disturbance including recreation/amenity use Introduction of alien invasive species Illegal Dumping Disturbance from Recreational/amenity use Inappropriate land management
004013	Drumcliff Bay	Site is selected for: Barnacle Goose, Sanderling, Additional Special Conservation Interests: Wetland & Waterbirds	Direct and indirect impacts to the habitats of the bird species of conservation interests (loss of habitat) Diect loss of habitat to development Water quality/pollution Disturbance including recreation/amenity use Introduction of alien invasive species Illegal Dumping Disturbance from Recreational/amenity use Inappropriate land management
004187	Sligo/Leitrim Uplands	Site is selected for: Peregrine, Chough.	Direct and indirect impacts to the habitats of the bird species of conservation interests (loss of habitat) Diect loss of habitat to development Water quality/pollution Disturbance including recreation/amenity use Introduction of alien invasive species Illegal Dumping Disturbance from Recreational/amenity use Inappropriate land management
004035	Cummeen Strand	Site is selected for: Light-bellied Brent Goose . Additional Special Conservation Interests: Oystercatcher,Redshank, Wetland & Waterbirds	Direct and indirect impacts to the habitats of the bird species of conservation interests (loss of habitat) Direct loss of habitat to development Water quality/pollution Disturbance including recreation/amenity use Introduction of alien invasive species Illegal Dumping Persecution (Poisoning) Disturbance from Recreational/amenity use Inappropriate land management

Site Code	Site Name	Qualifying Feature Annex I Species	Documented Potential Threats*
004129	Ballysadare Bay	Site is selected for: Light-bellied Brent Goose and Bar-tailed Godwit. Additional Special Conservation Interests: Grey Plover, Dunlin, Redshank, Wetland & Waterbirds.	Direct and indirect impacts to the habitats of the bird species of conservation interests (loss of habitat) Diect loss of habitat to development Water quality/pollution Disturbance including recreation/amenity use Introduction of alien invasive species Illegal Dumping Disturbance from Recreational/amenity use Inappropriate land management
004133	Aughris Head	Site is selected for: Kittiwake.	Direct and indirect impacts to the habitats of the bird species of conservation interests (loss of habitat) Diect loss of habitat to development Water quality/pollution Disturbance including recreation/amenity use Introduction of alien invasive species Illegal Dumping Disturbance from Recreational/amenity use Inappropriate land management

3.3.2 Conservation Objectives

A Natura 2000 site's Conservation Objectives are defined by DAHG and are, "intended to ensure that the relevant Annex I habitats and Annex II species present on a site are maintained in a favourable condition" (DEHLG, 2010). The DEHLG guidelines state that, "The Conservation Objectives derive from the qualifying interests, the Natura 2000 standard data form, and the management plan for the site, with summary information also available in the site synopsis." Whilst the Natura 2000 standard data forms and site synopses do present details of the qualifying features of Natura 2000 sites, and list the generic threats to those features, they do not define the Conservation Objectives of the site.

For the purposes of this assessment, information on the Conservation Objectives for the sites has been gained from consultation with NPWS relating to the Border Regional Planning Guidelines and NPWS generic Conservation Objectives for Natura 2000 Sites where no Management Plan is yet available.

Generic Conservation Objectives for SPAs are as follows:

- To maintain the bird species of special conservation interest for which the SPA has been listed, at favourable conservation status.

For cSACs, generic Conservation Objectives are as follows:

- To maintain Annex I habitats and Annex II species for which the cSAC has been selected at favourable conservation status;
- To maintain the extent species richness and biodiversity of the entire site; and
- To establish effective liaison and co-operation with landowners, legal users and relevant authorities.

The favourable conservation status of a species can be described as being achieved when:

> population data on the species concerned indicate that it is maintaining itself, and the natural range of the species is neither being reduced or likely to be reduced for the foreseeable future, and there is, and will probably continue to be, a sufficiently large habitat to maintain its populations on a long-term basis.

Favourable conservation status of a habitat can be described as being achieved when:

> its natural range, and area it covers within that range, is stable or increasing, and the ecological factors that are necessary for its long-term maintenance exist and are likely to continue to exist for the foreseeable future, and the conservation status of its typical species is favourable as defined below.

3.3.3 Documented Threats to the cSACs and to their Qualifying Features

Documented threats to Habitats Directive Annex I habitats and Annex II species in Ireland are presented in the 'Backing documents' and 'Form' for each habitat and species which are available at: http://www.npws.ie/en/PublicationsLiterature/HabitatsDirectivereport07/. Not all of these threats will apply to all cSACs in which these habitats and species are present; however gathering information on the documented perceived threats to the qualifying features of the sites (and therefore to the Conservation Objectives of the sites and the integrity of the sites) is an important prerequisite for assessing what are the 'likely significant effects' on the sites resulting from the Plan. No such information is available for Birds Directive Annex I bird species, and hence this method of inferring Conservation Objectives cannot be applied to SPAs.

Table 3.1 presents details of those threats, identified by NPWS, which it is considered likely will apply to the SAC's that are included in this assessment.

It is important to realise that many of these threats do not necessarily represent activities that occur within the boundary of the Natura 2000 site. This applies in particular to aquatic and marine features and systems which can be affected by impact sources that occur a large distance from the site.

3.3.4 Documented Threats to Special Protection Areas

Similar threats will apply to many of the SPAs that often correspond geographically to the cSACs. Generally speaking, the threats to the Annex I habitats and Annex II species of the cSAC will also apply to the Annex I bird species and bird populations in general that are the qualifying features of the SPAs. However, the birds that constitute the qualifying features of the SPAs are subject to a number of additional threats that do not generally apply to the qualifying features of the cSAC such as hunting pressure (both legal and illegal); and disturbance from noise and visual cues such as movement of pedestrians and vehicles.

Table 3.2 presents a summary of the generalised threats to the SPAs relevant to the Strandhill Mini-Plan.

3.3.5 Likely Changes to the Sites

The possible impacts that might arise from the Mini-Plan have been examined in the context of a number of factors that could potentially affect the integrity of the Natura 2000 sites. **Tables 3.3** and **3.4** present a summary of the findings of this exercise. Those sites for which potential effects and impacts have been identified have been taken forward to Stage 2 Appropriate Assessment. Those for which no potential impacts are anticipated as a result of implementation of the Plan do not require Stage 2 Appropriate Assessment and are 'screened-out' at this stage of the assessment.

Table 3.3: Possible Impacts on cSACs

Site Name	Reduction in Habitat Area	Disturbance to Key Species	Habitats or Species Fragmentation	Reduction in Species Density	Changes in Key Indicators of Conservation Value (Water Quality etc.)
Streedagh Point Dunes	None	None	None	None	None
Ben Bulben, Gleniff and Glende Complex	None	None	None	None	None
Lough Gill	None	None	None	None	None
Union Wood	None	None	None	None	None
Unshin River	None	None	None	None	None
Temple House and Cloonacleigha Loughs	None	None	None	None	None
River Moy	None	None	None	None	None
Ox Mountain Bogs	None	None	None	None	None
Knockalongy and Knockachree Cliffs	None	None	None	None	None
Ballysadare Bay	Potential Impacts	Potential Impacts	Potential Impacts	Potential Impacts	Potential Impacts
Cummeen Strand/Drumcliff Bay	Potential Impacts	Potential Impacts	Potential Impacts	Potential Impacts	Potential Impacts

Table 3.4: Possible Impacts on SPAs

Site Name	Reduction in Habitat Area	Disturbance to Key Species	Habitats or Species Fragmentation	Reduction in Species Density	Changes in Key Indicators of Conservation Value (Water Quality etc.)
Ardboline Island and Horse Island	None	None	None	None	None
Ballintemple and Ballygilgan	None	None	None	None	None
Drumcliff Bay	None	None	None	None	None
Sligo/Leitrim Uplands	None	None	None	None	None
Cummeen Strand	Potential Impacts	Potential Impacts	Potential Impacts	Potential Impacts	Potential Impacts
Ballysadare Bay	Potential Impacts	Potential Impacts	Potential Impacts	Potential Impacts	Potential Impacts
Aughris Head	None	None	None	None	None

3.4 SCREENING CONCLUSIONS

The likely impacts that will arise from the Strandhill Mini-Plan have been examined in the context of the key environmental factors that could potentially affect the integrity of the Natura 2000 network, e.g. disturbance, habitat loss, etc. and the results of the Screening Assessment, as presented in **Tables 3.3** and **3.4**. These tables indicate "None" for sites where no negative impact is anticipated on the Conservation Objectives or on the overall integrity of the site and "Potential Impact" for those sites where it is certain, likely or uncertain at this stage that impacts on the site may arise as a result of implementation of the Plan. Following the screening stage of the process, two SACs and two SPAs were brought forward for Stage 2 Appropriate Assessment (**Table 3.5**).

Table 3.5 Summary of Sites Requiring Stage 2 Appropriate Assessment

Site Name	Site Code	Requirement for Stage 2 Appropriate Assessment
Ballysadare Bay cSAC	000622	Required
Cummeen Strand/Drumcliff Bay cSAC	000627	Required
Cummeen Strand SPA	004035	Required
Ballysadare Bay SPA	004129	Required

4. STAGE 2 – DRAFT NATURA IMPACT REPORT

4.1 Overview

This section of the NIR records the assessment carried out on the Draft Strandhill Mini- Plan, as published and put on public display in January 2013. Four Natura 2000 sites were brought forward for Stage 2 – Appropriate Assessment. Each individual objective in the Draft Plan was reviewed with respect to each identified Natura 2000 site and a determination was made as to whether there was potential for any aspect of the objective, either alone or in combination with other related objectives, to impact on the integrity of the Natura 2000 site. Where a potential negative impact was identified, mitigation measures were proposed to reduce or eliminate the impact. In line with best practice, a hierarchy of mitigation, beginning with avoidance has been followed. Where avoidance is not possible, caveats have been added or changes to the wording of the objective have been identified which will mitigate the impact at this strategic level. None of the mitigation proposed removes the legal obligation to carry out Appropriate Assessment at the project level where required by the provisions of the Habitats Directive or by the implementing legislation in Ireland.

4.1.1 The Likely Effects of the Plan on Natura 2000 Sites

The AA (and associated SEA) has assessed both the Written Statement and the associated Maps for the draft Strandhill Mini-Plan. **Table 4.1** outlines the elements of the Draft Plan likely to result in negative impacts on Natura 2000 sites within Strandhill. All of the Natura 2000 sites that are included in the Stage 2 assessment are coastal and as the settlement is consolidated, there will be continuing demands made on the coastline, its habitats and surface waters. It is important that the coastal zone is managed and developed in a way that protects Natura 2000 Sites.

Population and economic growth over the past number of years has put pressure on habitats and species within Strandhill due to urbanisation, commercial development, housing and building in general, tourism and recreation and infrastructure provision. This has put strain on Strandhill's protected sites through increased pressure from discharges e.g. from wastewater treatment, and increased recreational disturbance from residential expansion and intensification of existing developments.

A number of objectives in the Mini-Plan propose the development of a network of walking trails that either cross or run along the boundaries of Natura 2000 sites. Whilst it is acknowledged that such facilities are beneficial to people's enjoyment of the countryside and can be valuable in developing a public appreciation of Strandhill's wildlife and biodiversity, it should also be recognised that pedestrians and other recreational users can cause a significant degree of disturbance to habitats, wildlife and particularly to birds including those for which SPAs have been designated.

Other potential impacts associated with the Mini-Plan include:

- Run off of pollutants during construction and operational phases of development;
- Loss, fragmentation and disturbance to habitats due to continued development and development intensification;
- Inadequate wastewater treatment resulting in pollution of surface waters.
- Upgrade of road infrastructure, water and waste water facilities and associated networks.
- Coastal protection works.
- Provision of recreational infrastructure such as promenade, car parks and picnic areas.
- Development of a recreational trail network.

4.2 Commitments to the Protection of NATURA 2000 sites in the Draft Mini-Plan

Chapter 44. Strandhill Mini-Plan sets out the following in relation to natural heritage;

'Strandhill is surrounded by some of Sligo's most valuable natural heritage sites. These sites are protected by European and national legislation, as they support a large number of diverse natural and semi-natural habitats and a wide range of flora and fauna.

The following areas are protected under the EU Habitats Directive (92.43/EEC) and EU Birds Directive (79/409/EEC):

- *Ballysadare Bay SAC (site code 00062)*
- *Cummeen Strand/Drumcliff Bay SAC (site code 000627)*
- *Cummeen Strand SPA (site code 004035)*
- *Ballysadare Bay SPA (site code 004129).*

Designated sites do not represent the full extent of Strandhill's natural heritage. The wider countryside also makes a valuable contribution to the overall coherence of the ecological network.'

The followings objectives in relation to Natura 2000 sites are provided in the draft Mini-Plan:

'44.1 Landscape, natural Heritage, open space.

A. Maintain and enhance the conservation value of the Natura 2000 sites surrounding the village. Ensure that Appropriate Assessment Screening is carried out for any plan or project within the Mini-Plan area with potential to impact on Ballysadare Bay SAC (site code 000622), Cummeen Strand/Drumcliff Bay SAC (site code 000627), Cummeen Strand SPA (site code 004035) and Ballysadare Bay SPA (site code 004129).

B. Prepare, in consultation with the DoECLG, a management plan for the Council-owned lands at Killaspugbrone, in compliance with the provisions of the Habitats Directive. '

4.2.1 Determination of the Adequacy of the Draft Plan's Commitment to the Protection of Natura 2000 Sites

It is considered that the Draft Plan is thorough and accurate with regard to the requirement for Appropriate Assessment Screening of projects that will or may be progressed as a result of adoption and implementation of the Draft Plan (Obj. 44.1 A).

It is considered that a number of objectives in the Draft Mini-Plan should make specific reference to the requirement for Appropriate Assessment screening. These are objectives which it is considered would pose a particular threat to the integrity of Natura 2000 sites were they to be implemented in the absence of Appropriate Assessment screening. In some cases this is due to the characteristics of the proposals outlined in the objective; in other cases it is due to the location(s) to which the objective refers, or it may be a combination of these factors.

Section 4.5 of this NIR details recommended amendments to specific objectives of the Draft Mini-Plan in this regard. Each section of the Draft Mini-Plan is discussed in sequence.

4.3 LIKELY SIGNIFICANT EFFECTS OF THE PLAN ON THE CONSERVATION OBJECTIVES OF NATURA 2000 SITES

In some cases specific objectives of the plan present specific threats to the conservation objectives of particular Natura 2000 sites. Impacts arising from the implementation of objectives of the draft plan which are likely to cause significant impacts on the integrity and conservation objectives of Natura 2000 sites include activities which give rise to:

- direct impacts on habitats listed on Annex I of the Habitats Directive and for which the site is designated;
- reduction in the area of any habitats within the site;
- direct or indirect damage to the physical quality of the environment (e.g. water quality) in the Natura 2000 site.
- serious or ongoing disturbance to species or habitats for which the Natura 2000 site is selected (e.g. increased noise, illumination, human activity);
- direct or indirect damage to the size, characteristics or reproductive ability of populations of species for which the Natura 2000 site is designated;
- activities which interfere with mitigation measures put in place for other plans or projects.

All of the draft plan objectives were reviewed to identify likely significant effect of the Mini-Plan on the conservation objectives of Natura 2000 sites. Consideration was given to direct and indirect impacts which may arise from activities which could be encouraged by objectives contained in the draft plan. Such activities could include new residential, commercial, infrastructural, recreational or other development which may give rise to direct impacts on habitats or species (loss of habitat, disturbance to species); as well as activities which could have indirect impacts (e.g. activities which could affect water quality or hydrology which could in turn affect the status/health of populations of water dependant habitats or species). Table 4.1 presents details of the specific objectives of the Mini-Plan that are considered potentially to have significant negative impacts on particular Natura 2000 sites. Section 4.5 presents the amendments to these objectives that are considered necessary to remove these specific threats.

Draft Mini-Plan Objectives	Plan Objectives Which Might Give Rise to Impacts on Natura 2000 sites	Potential for impact on Natura 2000 sites	Natura 2000 site(s) which could be affected
44.1 Landscape, natural heritage, open space.	A. Provision for Appropriate Assessment screening of plans and projects.	Positive impact on Natura 2000 sites.	n/a
	B. Provides for preparation of management plan for council owned lands.	Positive impact on Natura 2000 sites.	n/a
	C. Provides for Ecological Impact Assessment in respect of County Biodiversity Site.	Positive impact on biodiversity generally.	n/a
	D. Protection of existing views when assessing development proposals.	No impacts identified.	n/a
	E. Protection of national monuments.	No impacts identified.	n/a
	F i-v. Preservation of views.	No impacts identified.	n/a
	G i-ii. Provision of incidental public open spaces (OS1, OS2, OS3 on objectives map).	No impacts identified re OS1 & OS3.OS2 has potential for negative impact on Natura 2000 sites due to proximity to Natura 2000 site and specifically arising from site preparation, construction, future management and use/introduction of invasive species.	Cummeen Strand/Drumcliff Bay SAC
	H. Provides for retention of open space at Seaview House.	No impacts identified.	n/a
44.2 Coastal protection	A. Provides for preparation of an integrated coastal management plan for Strandhill.	Potential positive and negative impacts on Natura 2000 sites. Most of the soft coast environment at Strandhill is designated as Natura 2000 sites. Preparation of an integrated coastal management plan should be undertaken in consultation with NPWS, DAHG and should be subject to appropriate assessment.	Cummeen Strand/Drumcliff Bay cSAC Ballysadare Bay cSAC

	B. Objective to maintain an 80m natural buffer along the shoreline.	Positive impact on Natura 2000 sites.	n/a
	C. Retention of a natural storm berm and dune buffer zone to west of caravan park.	Positive impact on Natura 2000 sites.	n/a
	D. Objective to maintain and review dune management.	Potential positive and negative impacts on Natura 2000 sites. Most of the soft coast environment at Strandhill is designated as Natura 2000 sites. Preparation of an integrated coastal management plan should be undertaken in consultation with NPWS, DAHG and should be subject to appropriate assessment.	Cummeen Strand/Drumcliff Bay cSAC Ballysadare Bay cSAC
44.3 Built heritage and streetscape	A. Objective re design of new development along the Top Road.	No impacts identified.	n/a
	B. Objective to retain buildings of note in new development.	No impacts identified.	n/a
	C. Protection and conservation of Protected Structures within the Plan area.	No impacts identified.	n/a
44.4 Mixed-use zones	A-B. Objectives relating to urban design and development standards.	No impacts identified.	n/a
	C. Objective relating to upgrade of existing properties fronting onto promenade (MIX 1).	No impacts identified.	n/a
	D. Objective to encourage redevelopment of the Promenade 'Corner' subject to any necessary coastal protection measures (MIX 1).	Potential negative impact on Natura 2000 sites arising from associated coastal protection measures. Most of the soft coast environment at Strandhill is designated as Natura 2000 sites. Redevelopment and coastal protection measures should be undertaken in consultation with NPWS, DAHG and should be subject to appropriate assessment.	Cummeen Strand/Drumcliff Bay cSAC Ballysadare Bay cSAC