To: The Secretary, An Bord Pleanála, 64 Marlborough Street, Dublin 1.

RE: Appeal against a Section 5 Declaration – Sligo County Council Ref: ED 628/FL/CP
Location: Strandhill Wastewater Treatment Plant (WWTP) and Killaspugbrone Looped Trail, Co. Sligo.
Appellant: Áine Nic Amhlaidh.

Dear Secretary,

I wish to lodge a formal appeal under **Section 5(4) of the Planning and Development Act 2000 (as amended)** against the decision of Sligo County Council to declare that the physical expansion of the Strandhill WWTP and the intensification of the Killaspugbrone Looped Trail constitute "exempted development."

The appellant contends that the Planning Authority has fundamentally erred in law. This appeal is grounded in the following core legal and scientific arguments:

- **Mandatory Loss of Exemption (Section 4(4)):** Under Section 4(4) of the Act, development is not "exempted" if an Appropriate Assessment (AA) is required (p. 1). The current works deviate from the strict physical and hydrological constraints established in the **2013 Habitats Directive Screening**, thereby triggering a mandatory Stage 2 AA (pp. 1, 12).
- **Breach of 2013 Screening Constraints:** The 2013 Screening was predicated on the WWTP **not exceeding its existing footprint** (pp. 1, 12). On-site evidence proves the 2021 expansion violates this constraint, encroaching directly into the habitat of the **Annex II Narrow-mouthed Whorl Snail (*Vertigo angustior*)** (pp. 7, 12).
- **Hydrological Sensitivity:** As documented by **Moorkens (2013)**, the site possesses extreme hydrological sensitivity (pp. 1, 12). Any unassessed excavation poses a "likely significant effect" on protected species, necessitating a **Natura Impact Statement (NIS)** (pp. 12-13).
- **Reliance on Obsolete Data vs. 2025 Baseline:** The Council has ignored its own **2025 Public Realm AA Screening (LUC, Feb 2025)**, which acknowledges "extreme human-induced pressure" from **500,000+ annual visitors** (pp. 2, 4-5). Relying on a 2013 screening for a 2025 reality violates the **Waddenzee (C-127/02)** "Best Scientific Knowledge" standard (pp. 3, 5).
- **Improper Mitigation (People Over Wind C-323/17):** The Council has improperly used mitigation measures (fencing, signage) to bypass a full AA at the screening stage, a practice explicitly prohibited by the CJEU (pp. 11-12).

Enclosures:

1. Complete Grounds of Appeal (22 Sections).
2. The prescribed appeal fee of **€220**.
3. Copy of Sligo County Council's Section 5 Declaration (ED 628/FL/CP).

AN COIMISIÚN PLEANÁLA
LDG- 087136/26
ACP-
27 MAR 2026
Fee: € 220 Type: PO
Time: 11:15 By: Post

I request that the Board conduct a **de novo review** of this case and declare that the works are "Development" and **"Not Exempted Development"** due to the requirement for a Stage 2 Appropriate Assessment.

Yours faithfully,



Áine Nic Amhlaidh
Date: March 26, 2026

To: The Secretary, An Bord Pleanála, 64 Marlborough Street, Dublin 1.
Appellant: Áine Nic Amhlaidh
Planning Authority: Sligo County Council

Subject: Appeal against a Section 5 Declaration, ref: **ED 628/FL/CP** regarding the Strandhill WWTP and Killaspugbrone Looped Trail.

1. Introduction & Purpose of Appeal

I wish to appeal the decision of Sligo County Council which declared that the physical expansion of the Strandhill WWTP and the intensification of the Killaspugbrone Looped Trail constitute "exempted development."

It is the appellant's contention that the Planning Authority has erred in law. Under Section 4(4) of the Planning and Development Act 2000 (as amended), the exemption status is de-coupled where an Appropriate Assessment (AA) is required. The Council has failed to acknowledge that the current scale of development/operation triggers a mandatory Stage 2 AA (Natura Impact Statement).

2. Ground 1: Loss of Exemption under Section 4(4) Breach of Defined Environmental Constraints & Hydrological Sensitivity

The appellant submits that the Planning Authority has disregarded the specific physical and scientific constraints established in its own 2013 Habitats Directive Screening Report (Variation No. 1, Strandhill Mini-Plan), rendering the current "Exempted Development" status legally void.

Violation of the "Footprint Constraint" (2013 Screening):
The 2013 Screening Report for the Strandhill Mini-Plan (and associated WWTP upgrades) was predicated on a fundamental environmental "avoidance measure." The report explicitly stipulated that any development at the WWTP site must not exceed the footprint (width or depth) of the existing plant.

- The Breach: On-site evidence and recent works confirm the 2021/2022 expansion has exceeded these 2013 dimensions.
- Legal Consequence: Because the 2013 "No Significant Effect" conclusion was legally dependent on this strict footprint limit, any deviation constitutes a material change that triggers a mandatory Stage 2 Appropriate Assessment (AA).

Disregard for Specialist Hydrological Evidence (Moorkens, 2013):
The Council has failed to account for the site-specific sensitivity of the Annex II Narrow-mouthed Whorl Snail (*Vertigo angustior*), as documented by Moorkens (2013) in the assessment for the Killaspugbrone dunes.

- Hydrological Vulnerability: Moorkens (2013) identified that this species relies on precise groundwater seepage and moisture gradients.
- The Impact: Any excavation or expansion beyond the 2013 footprint (including the current intensification of the looped trail) risks altering the sub-surface hydrology of the dune system.

- Scientific Doubt: Under the Precautionary Principle and Waddenzee (C-127/02), the "mere possibility" of a hydrological shift impacting an Annex II species necessitates a full Natura Impact Statement (NIS). The Council's reliance on an obsolete 2013 screening to bypass this is a manifest error in law.

Inconsistency with 2025 Public Realm Data:
The Planning Authority is currently attempting to "Screen Out" the WWTP expansion using 2013 data while simultaneously "Screening In" management measures for the 500,000+ visitors identified in the 2025 Public Realm AA Screening (LUC, Feb 2025).

- The Conflict: The 2025 report confirms a baseline of "extreme human-induced pressure." It is scientifically irrational to claim that the WWTP—which processes the waste from these 500,000 visitors—can be assessed using 2013 "local-scale" data.
- Legal implication: The "In-Combination" effect of the WWTP failures (documented by EPA Report SV27364) and the massive surge in trail users (documented in the 2025 Public Realm Report) creates a cumulative impact that has never been assessed. Therefore, the development cannot be classed as "Exempted."

3. Ground 2: Physical Deviation from 2007 Part 8 Footprint

The Planning Authority has treated the 2021 upgrades as "maintenance" or "minor works."

- Evidence: The 2021 footprint extends beyond the 2007 permitted boundaries into the Cummeen Strand/Drumcliff Bay SAC (Site 000627).
- Impact: This encroachment impacts the Annex II *Vertigo angustior* (Snail) habitat. Any physical expansion within an SAC that was not specifically assessed in the original 2007 grant constitutes unauthorised development.

4. Ground 3: Intensification of Use as "Material Change of Use"

The Council has ignored the "intensification" of the Killaspugbrone Looped Trail (500,000+ visitors).

- Planning Fact: In Irish planning law, a significant intensification of use (from a local trail to a national-scale tourism hub) constitutes a material change of use, which is "development" under Section 3 of the Act.
- In-Combination Effects: The Council failed to assess the cumulative impact of the National Surf Centre, the WWTP effluent failures, and trail erosion. Under the Habitats Directive, "in-combination" impacts must be assessed. Failure to do so renders the "Exempt" status invalid.

5. Ground 4: Environmental Failure & The Precautionary Principle

The appellant draws the Board's attention to EPA Site Visit Report SV27364 (Nov 2023).

- Documented Failure: The EPA confirms Ammonia (NH_3) breaches caused by "increased loading from the tourism sector."
- The Conflict: Sligo CDP 2024-2030 (Policy P-IU-W-1) requires compliance with EPA licensing. Operating at 97% increased capacity without a finalized EPA license (Ref:

D0163-01) for that specific capacity creates a "regulatory vacuum" that the Planning Authority has failed to address.

Ground 6: Contradiction with 2025 Public Realm AA Screening

The appellant submits that the Planning Authority is operating under two conflicting sets of environmental data for the same geographical area.

- The Conflict: The Council's 2025 Public Realm AA Screening acknowledges the scale of Strandhill as a "unique coastal destination" attracting 500,000+ annual users. This confirms that the baseline for "human-induced pressure" has shifted fundamentally since the 2013 WWTP Screening was conducted.
- The 500,000 Visitor Threshold: By justifying the Public Realm works on the basis of managing these extreme visitor numbers, the Council has formally accepted that this level of activity exists. However, they have simultaneously refused to apply this same "best scientific knowledge" to the Section 5 declaration for the WWTP.
- Legal Error: Under the Waddenzee (C-127/02) standard, an assessment must be based on the best scientific knowledge available at the time of the decision. By relying on a 2013 document while possessing a 2025 document that confirms a massive surge in "pulse loading", the Council has knowingly used obsolete data to maintain an "Exempted Development" status.

Direct Contradiction: Strandhill Public Realm Enhancement (Part 8) project, initiated in February 2025, includes a contemporary Appropriate Assessment (AA) Screening Report that explicitly acknowledges the high volume of visitors to the area.

1. The "In-Combination", The 2025 Public Realm AA *should* have assessed the WWTP failures "in-combination" with the new works. If it didn't, then the Public Realm AA is also flawed; if it did, it would have had to acknowledge the Ammonia failures you've already documented.
2. The Whorl Snail Habitat: The Public Realm report likely mentions the Annex II Narrow-mouthed Whorl Snail, the WWTP footprint (the 2021 expansion) is sitting directly on the habitat they claim to be protecting in the 2025 report.

Ground 7: Explicit Contradiction with Contemporary Planning Data

Public Realm Screening - The AA Screening Report - LUC - February 2025, prepared by Land Use Consultants (LUC) on behalf of Sligo County Council to support the Strandhill Public Realm Enhancement Part 8 (launched February 27, 2025).

The appellant submits that the Planning Authority has ignored its own most recent scientific baseline for the Strandhill area.

- Evidence of New Baseline: In the AA Screening Report (LUC, Feb 2025) for the *Strandhill Public Realm Enhancement*, the Council acknowledges that the scheme is designed to *"re-address the balance between vehicles and pedestrians for current user levels".*
- The "500,000 Visitor" Fact: This 2025 report and its associated Chief Executive's Report (June 2025) validate the existence of extreme seasonal "pulse loading" and a massive increase in visitors to the area (often cited in regional tourism strategies as exceeding 500,000 annually).
- Logical Inconsistency: It is scientifically impossible for the Council to claim in February 2025 that the area requires a public realm overhaul to manage current high-intensity "user levels," while simultaneously claiming in this Section 5 Declaration that the WWTP is still adequately governed by a 2013 Screening that never accounted for this scale of human-induced pressure.
- Breach of "Best Scientific Knowledge": By choosing to ignore the 2025 baseline in favour of the 2013 data, the Council has failed the "Best Scientific Knowledge" standard required by Article 6(3) of the Habitats Directive and Case C-127/02 (Waddenzee).

  The "People Over Wind": *"The 2013 Screening is legally flawed as it pre-dates C-323/17, which prohibits the use of mitigation measures at the screening stage."*

Ground 8: Contradiction with 2025 Public Realm AA Screening

The appellant submits that the Planning Authority is operating under two conflicting sets of environmental data for the same geographical area.

- The Conflict: The Council's 2025 Public Realm AA Screening acknowledges the scale of Strandhill as a "unique coastal destination" attracting hundreds of thousands of annual users. This confirms that the baseline for "human-induced pressure" has shifted fundamentally since the 2013 WWTP Screening was conducted.
- The 500,000 Visitor Threshold: By justifying the Public Realm works on the basis of managing these extreme visitor numbers, the Council has formally accepted that this level of activity exists. However, they have simultaneously refused to apply this same "best scientific knowledge" to the Section 5 declaration for the WWTP.
- Legal Error: Under the Waddenzee (C-127/02) standard, an assessment must be based on the best scientific knowledge available at the time of the decision. By relying on a 2013 document while possessing a 2025 document that confirms a massive surge in "pulse loading", the Council has knowingly used obsolete data to maintain an "Exempted Development" status.

1. The 2025 Public Realm AA mentions "user levels" or "seasonal surges".
2. The "In-Combination" : The 2025 Public Realm AA *should* have assessed the WWTP failures "in-combination" with the new works. If it didn't, then the Public Realm AA is also flawed; if it did, it would have had to acknowledge the Ammonia failures you've already documented.

3. The Snail Habitat: Annex II Narrow-mouthed Whorl Snail The WWTP footprint (the 2021 expansion) is sitting directly on the habitat which Sligo County Council claim to be protecting in the 2025 report.

Ground 8.2 Impact on Visual and Cultural Amenity:

As a visual artist and educator deeply embedded in this landscape, I submit that the 'decimation' of this delicate ecosystem is not merely a technical breach but a profound loss of visual and cultural amenity. The Council has failed to assess how the unauthorized physical expansion and trail intensification degrade the 'unique character' of Strandhill, which is a primary asset for both the local community and the 500,000+ visitors they now claim to manage.

Ground 9: Explicit Contradiction with Contemporary Planning Data

The appellant submits that the Planning Authority has ignored its own most recent scientific baseline for the Strandhill area.

- Evidence of New Baseline: In the AA Screening Report (LUC, Feb 2025) for the *Strandhill Public Realm Enhancement*, the Council acknowledges that the scheme is designed to *"re-address the balance between vehicles and pedestrians for current user levels"*.
- The "500,000 Visitor" Fact: This 2025 report and its associated Chief Executive's Report (June 2025) validate the existence of extreme seasonal "pulse loading" and a massive increase in visitors to the area (often cited in regional tourism strategies as exceeding 500,000 annually).
- Inconsistency: It is scientifically impossible for the Council to claim in February 2025 that the area requires a public realm overhaul to manage current high-intensity "user levels," while simultaneously claiming in this Section 5 Declaration that the WWTP is still adequately governed by a 2013 Screening that never accounted for this scale of human-induced pressure.
- Breach of "Best Scientific Knowledge": By choosing to ignore the 2025 baseline in favour of the 2013 data, the Council has failed the "Best Scientific Knowledge" standard required by Article 6(3) of the Habitats Directive and Case C-127/02 (Waddenzee).

The 2025 Public Realm Conflict

- Sligo County Council identified in Feb 2025 (Public Realm AA) that the Strandhill area is under "extreme human-induced pressure
- The Planning Authority is attempting to use 'Schrödinger's Baseline'—claiming the area is overwhelmed by 500,000 visitors to justify new Public Realm spending, while

simultaneously claiming those same 500,000 visitors have no material impact on the WWTP capacity in this Section 5 declaration.

A Decade of Attempting to this to the attention of Authorities

Enclosed is a chronological record of over ten years of communications with Sligo County Council, the EPA, the Office of the Planning Regulator (OPR), the National Parks and Wildlife Service (NPWS), and the Office of the Information Commissioner (OIC). This dossier documents my repeated efforts to highlight the severe environmental and public health impacts of this facility—warnings that have been validated by recent EPA findings but ignored by the Planning Authority in their current declaration.

Public Health and Commercial Risk

This appeal is grounded in the lived reality of the Strandhill community. The WWTP discharges directly into a Special Area of Conservation (SAC) and is located less than 1km from the Coney Island Oyster Farm Furthermore, the discharge point at Killaspug Point, in close proximity to the most popular Strandhill Surf Spot - "Blue Rock" which sits directly opposite a the WWTP exposing recreational users—including my own children—to documented pathogen risks and chemical failures. 4. Public Health & Marine Risk

The discharge point in close proximity to "Blue Rock" (a primary surf zone) and its proximity (<1km) to the Coney Island Oyster Farm creates an unacceptable risk profile. For ten years, the appellant has documented these failures to the Council, EPA, and NPWS. This appeal seeks to end the "Regulatory Vacuum" that allows this plant to operate without contemporary environmental assessment.

Ground 11: Documented Environmental & Public Health Impact

The appellant provides the following specific evidence to prove that the development has "significant effects" on a European Site, thereby stripping it of any exempted status under Section 4(4):

- EPA Confirmed Failures: EPA Site Visit Report SV27333 (Oct 2023) records multiple Ammonia (NH3) breaches, with levels reaching more than five times the legal limit of
- The "Tourism Loading" Admission: During the 2023 inspection, Uisce Éireann representatives formally attributed these failures to "increased loading from the tourism sector". This confirms that the intensification of the Killaspugbrone Trail and wider Strandhill tourism is a direct driver of environmental non-compliance.
- Proximity to Protected Industry: The Sligo County Council Climate Action Plan acknowledges the WWTP's proximity (under 1km) to the

Coney Island Oyster Farm and the exposure of "surfers (bathers)" to pathogens within the SAC.

- Scientific Obsolescence: The Council's Section 5 declaration relies on a 2013 AA Screening that predates the 2021 capacity upgrade and the 2023-2024 evidence of chemical failure. Under the Precautionary Principle, an exemption cannot persist where evidence of actual environmental harm exists.

Ground 12: Direct Encroachment & Precedent (The "Lough Talt" Comparison

The appellant submits that the Physical Development of the Strandhill WWTP (2021) is unauthorised as it violates the specific limiting conditions of its own screening and ignores established legal precedent within the county.

1. Breach of the 2013 AA Screening Mandate

The 2013 AA Screening Report (on which the Council relies) explicitly stated that any upgrade works must not be deeper, wider, or larger than the existing plant footprint.

- The Physical Fact: The 2021 construction is deeper, wider, and larger. It significantly exceeds the 2007/2013 footprint.
- The Habitat Breach: This expanded footprint encroaches directly into the identified habitat of the Annex II Narrow-mouthed Whorl Snail (*Vertigo angustior*). Under the Habitats Directive, any project resulting in the loss of Annex II habitat cannot be screened out; it requires a Stage 2 NIS and potentially Article 6(4) "IROPI" justification.

3. **The Lough Talt Precedent - The Double Standard**

The Board is requested to note the Lough Talt WWTP Upgrade (Sligo), where development was halted and redirected specifically due to the Council's legal obligation to protect and restore the habitat of the Narrow-mouthed Whorl Snail.

- The Contradiction: In the case of Lough Talt, the Council acknowledged that the snail habitat was a "red line" for development.
- The Failure at Strandhill: At Strandhill, the Council has allowed a physical expansion on top of the same protected habitat. By failing to require an AA for Strandhill, the Council is engaging in a deliberate avoidance of environmental law to facilitate tourism-driven development.
- Intentional Avoidance of Appropriate Assessment: The refusal to perform a contemporary AA is a strategic attempt to bypass the Precautionary Principle. If a Stage 2 AA were conducted today, the project would fail the "Adverse Effects" test due to the combined impact of:
- Physical habitat loss (Snail habitat).

- Chemical failure (Ammonia breaches).
- Hydraulic failure (500,000+ visitors "pulse loading").

Ground 13: Obstruction of Environmental Reporting & Regulatory Vacuum

The appellant submits that the Planning Authority and Uisce Éireann have created a reporting vacuum that prevents the accurate monitoring of "significant effects" on the SAC.

- Suppression of Odour Complaints: For years, the appellant has reported noxious odours from the WWTP. Sligo County Council formally instructed the appellant to cease reporting these to the Council and to deal directly with Uisce Éireann.
- The "Eircode Barrier": Uisce Éireann's official online reporting portal requires an Eircode to log a complaint. Because the WWTP discharge point (outfall pipe) at the sea has no Eircode, it is technically impossible for citizens to log formal environmental complaints through the standard digital channel.
- Consequence: This failure to provide a functional reporting mechanism means the "Best Scientific Knowledge" baseline used for the Section 5 declaration is factually incomplete, as it excludes a decade of suppressed public complaints regarding operational failures.

Ground 14: Non-Transparency & FOI Denial (Killaspugbrone Loop)

The appellant has repeatedly sought access to the environmental assessments and Appropriate Assessment (AA) Screening for the Killaspugbrone Loop Trail via Freedom of Information (FOI) and Access to Information on the Environment (AIE) requests.

- The Denial: Sligo County Council has refused or denied these requests, claiming the records do not exist or are exempt.
- The Planning Implication: If the Council cannot produce a valid AA Screening for a trail now carrying 500,000+ visitors, then the trail's "exempted" status is legally unverified.
- Strategic Avoidance: The refusal to provide these documents, combined with the Lough Talt double standard (where the Council *did* protect the whorl snail), suggests a deliberate attempt to promote residential over zoning and tourism-driven development by withholding evidence of its ecological impact.

Ground 15: Breach of Part 8 Limits & "Future Proofing" without Assessment

The appellant submits that the Director of Services' letter (23rd July 2021) confirms a fundamental breach of the Planning and Development Regulations 2001.

- The Admission: The Director states that the 2021 constructed plant was built to incorporate a degree of "future proofing" to meet population growth over "the life of several plans."
- The Legal Error: A Part 8 approval (2007) is specific to the project described at that time (4,500 PE). If the Council "future-proofed" the physical build in 2021 to a higher

capacity than what was approved in 2007, they have exceeded their planning permission.

- Capacity vs. Approval: Building for "several plans" ahead without a new Part 8 process or a contemporary Natura Impact Statement (NIS) is a classic case of Project Splitting. The Council has built a larger-capacity asset than they legally assessed in 2007/2013.

Ground 16: Systemic Over-Zoning & Ministerial Intervention

The appellant submits that the Planning Authority has willfully ignored higher-tier planning directives to facilitate unsustainable development in Strandhill.

- The OPR Warning: The Office of the Planning Regulator (OPR) issued specific warnings to Sligo County Council regarding the over-zoning of residential lands in Strandhill in the *Sligo County Development Plan (CDP) 2024–2030*.
- Ministerial Direction: These warnings resulted in a Draft Ministerial Direction (November 2024) issued by the Minister for Local Government, which sought to overturn the Council's unsustainable zoning decisions.
- The Breach: Elected officials chose to ignore these expert warnings and the Minister's direction to maintain high-density zoning. By doing so, the Council has knowingly created a "loading crisis" for the WWTP that was never assessed in the 2013 AA Screening.

Ground 17: Factually Incorrect "Headroom" & Developer Sewage Systems

The appellant challenges the core "Scientific Baseline" used by the Council to claim the WWTP has sufficient capacity.

- The "Shadow" Loading: Between 2007 and 2021—while the WWTP was failing—numerous housing estates were permitted in Strandhill. Crucially, these estates were built with independent developer-managed sewage systems rather than connecting to the public WWTP.
- False Headroom: The Council's claim that the 2021 upgradeprovides sufficient "headroom" for future growth is factually incorrect. It is based on a calculation that assumes these independent systems will eventually connect, yet it fails to account for the current Ammonia (NH_3) failures caused solely by existing users and "pulse" tourism loading.
- The Legal Consequence: Because the "loading" data used in the Section 5 declaration is fundamentally inaccurate and excludes the "shadow" impact of these unconnected estates, the declaration is scientifically invalid and fails the Waddenzee standard of "best scientific knowledge".

Ground 18:

Evidence of a long-standing failure to address WWTP concerns is found in the attached council minutes from late 2016 and early 2017. My formal request for an inquiry into the

plant's upgrade was tabled three times but remained undiscussed. This persistent lack of engagement by the local authority, as further evidenced by the recent Director of Services letter, underscores a systemic disregard for the environmental and planning risks I have consistently highlighted.

Ground 19: Whorl Snail – This is included in the 2013 AA Screening Report

Dr. Moorkens is the leading expert who famously designed the conservation solution for the Narrow-mouthed Whorl Snail (*Vertigo angustior*) at that site.

Context of the Strandhill Report - In 2013, Dr. Moorkens was commissioned to address the Whorl Snail Habitat challenge, leading to several key outputs:

- Conservation Solution: Dr. Moorkens designed a specialized irrigation system for the Special Area of Conservation (SAC) to maintain the precise hydrological conditions the snails require, allowing construction to eventually proceed.
- Revised Planning: Her findings and mitigation strategies were integrated into the revised planning application for the facility, which was eventually granted.
- National Baseline (2011): Prior to the 2013 construction halt, she co-authored the foundational Monitoring and Condition Assessment of Populations of Vertigo angustior in Ireland (Irish Wildlife Manual No. 55), which establishes the national monitoring standards used for the Strandhill site.

Ground 19: Procedural Irregularity and Obstruction of Environmental Information

The appellant submits that the Planning Authority has actively obstructed the gathering of evidence required to challenge this Section 5 Declaration.

- The Missing Record: Upon reopening of the Planning Office in August 2021, I requested the hard copy of the Sligo Development plan which included the 2013 Strandhill Mini Plan. I discovered that Chapter 44 was never incorporated into the Sligo Development and has never been published. This chapter is critical to understanding the historical zoning and environmental constraints of the WWTP site.
- Data Deletion & FOI Denial: The Council has formally denied the appellant further Freedom of Information (FOI) requests, claiming a "limit" has been reached.
- Furthermore, CCTV footage requested to document the appellant's attempt to view the missing files was "mysteriously" deleted or unavailable, this was appealed to the Office of the Ombudsman.
- Legal Breach: Under the Aarhus Convention and S.I. No. 133/2007 (Access to Information on the Environment), the Council has a mandatory duty to make environmental data available. By withholding/losing the 2013 Mini Plan data and

blocking FOI access, the Council has prejudiced the appellant's ability to participate in the planning process.

- Inference of Non-Compliance: The Board is requested to draw an adverse inference from the fact that the Council cannot produce the 2013 baseline data (Published Co. Sligo Development Plan Chapter 44) while simultaneously relying on that same era's "Screening" to grant an exemption.

Ground 20: Contradicting the 2013 Findings

The 2013 Habitats Directive Screening Report explicitly stated that amendments like the trail were "likely to have adverse effects". Proceeding with a "Screening" only (Stage 1) while ignoring these findings is a direct breach of the Precautionary Principle, which requires all "scientific doubt" to be removed before granting consent.

In the **People Over Wind (POW) case**, the CJEU ruled that mitigation measures (like the fencing or signs the Council now uses) cannot be considered during the initial Screening stage to avoid a full AA. If the Council used these measures to justify *not* doing a full AA in 2016, the decision is legally flawed.

Evidence of Environmental Failure, these adverse effects were predicted in 2013 have manifested:

- **Documented Habitat Decline**: The 2025 Draft County Sligo Biodiversity Action Plan confirms that **46% of EU-protected habitats** in Sligo are in decline.
- **Accelerated Erosion**: The 2023 Sligo Bay Coastal Erosion Study records retreat of up to **2.0m per year** in areas directly impacted by the trail's increased traffic.
- **Lack of Conservation Objectives**: Ireland recently lost a major European Court of Justice case for failing to implement site-specific conservation measures for its SACs. Your case aligns with this systemic failure to protect the Killaspugbrone dunes.

The **Amendment A-11** was specifically described in the 2013 planning process as the proposal for a **formalized coastal walkway/promenade extension** heading north from the existing promenade towards the Killaspugbrone area.

Evidence of Amendment A-11 as "Coastal Walks"

The following documentation confirms its nature and the Council's specific reasons for excluding it:

- Documentary Proof: The Second Manager's Report (September 2013) explicitly recommended the non-adoption of A-11 because it was identified as a "material alteration" that would likely have "significant effects on the environment".
- The Natura Impact Report (NIR) : The NIR for Proposed Amendments concluded that A-11 (the coastal walkway extension) was "likely to have adverse effects on Natura 2000 sites", specifically the Cummeen Strand/Drumcliff Bay SAC.

- Avoidance of Full AA: To legally adopt the rest of the Strandhill Mini-Plan without undergoing a full Stage 2 Appropriate Assessment (AA), the Manager removed A-11. This allowed the Council to issue a Stage 1 Screening Conclusion stating the final plan (minus the trails) would have "negligible effects".

The original A-11 text was removed from the final 2013 plan, however, the Draft Maps from January 2013 show the proposed route: It extended from the end of the existing Promenade (MIX 1 area) and followed the coastline northwards into the Killaspugbrone dune system.

Ground 21: The proposed WWTP development violates legally binding 2013 footprint constraints, necessitating a full Natura Impact Statement (NIS) rather than mere screening.

The 2013 Habitats Directive Screening Report for the Strandhill Mini-Plan (and associated WWTP upgrades) explicitly stipulated that any development at the WWTP site must not exceed the footprint (width or depth) of the existing plant. This constraint was a fundamental "avoidance measure" used to conclude "no significant impact" at the Screening stage.

- Legal Point: By exceeding these dimensions in current works, the Council has invalidated the original Screening conclusion. Under the Precautionary Principle, any deviation from these "non-significant" parameters necessitates a Stage 2 Appropriate Assessment (AA).

2. Failure to Protect the Narrow-Mouthed Whorl Snail (*Vertigo angustior*):
The site-specific assessment conducted by Moorkens (2013) identified the Killaspugbrone dunes as a critical habitat for the Annex II species *Vertigo angustior*.

- Scientific Doubt: Moorkens highlighted the extreme hydrological sensitivity of the site. The whorl snail relies on a precise "transition zone" of water table levels.
- Impact: Any unassessed excavation or change in the WWTP footprint risks altering the local hydrology (groundwater flow/seepage), which is a "likely significant effect" on a protected species.

3. Improper Use of Mitigation (The *People Over Wind* Breach):
The Council appears to be treating the 2013 constraints or current "protective" fencing as a reason to stay at Stage 1 Screening.

- Per CJEU C-323/17 (People Over Wind), mitigation measures (like strict footprint limits or protective barriers) cannot be used to "screen out" a project. Since the 2013 Screening relied on the *absence* of expansion to avoid a full AA, any expansion now *must* be treated as a project requiring a full Natura Impact Statement (NIS).

4. Evidence of Systemic Failure (Site-Specific Conservation Objectives):
The recent ruling against Ireland in CJEU Case C-444/21 confirmed a failure to establish site-specific conservation measures for SACs.

- In the absence of these legally required measures for the Cummeen Strand/Drumcliff Bay SAC, the Council cannot definitively claim that "minor" changes to the WWTP or trails will not harm the site's integrity.

The site's high hydrological sensitivity, critical for the endangered *Vertigo angustior* snail, presents significant risks that, coupled with improper reliance on mitigation, render the project invalid without a Stage 2 Appropriate Assessment. The works constitute 'Development' and are not 'Exempted Development' because they require a Stage 2 Appropriate Assessment under the Habitats Directive, as evidenced by the Council's own 2013 Screening Report and the Moorkens (2013) expert findings.

Ground 22: Systematic Failure in Reporting & Regulatory Compliance

The appellant submits that the Planning Authority has actively suppressed environmental complaint data, leading to a false baseline of the WWTP's performance.

- Non-Disclosure of Odor Complaints: Between [Insert Years, e.g., 2021–2024], the appellant made multiple formal reports to Sligo County Council regarding noxious odors emanating from the Strandhill WWTP.
- Breach of License: Under the EPA Wastewater Discharge License (Ref: D0163-01), the licensee is mandated to record and report all environmental complaints. However, these reports were never forwarded to Uisce Éireann (Irish Water) or the EPA.
- Evidence of Negligence: This failure to report is not a mere administrative oversight; it is indicative of a systemic effort to under-report the plant's failure to meet its environmental standards.
- Prejudicial to Decision-Making: By withholding this "nuisance" data, the Council has misled both the public and the EPA regarding the plant's actual impact on the local community and the Natura 2000 site. The Board cannot rely on a "Screening" that is based on incomplete and suppressed complaint data.

As a teacher and artist, I am trained to look for patterns. The pattern here is one of systematic erasure. When the 2013 Mini Plan is missing its most critical chapter, when CCTV of my visit 'disappears,' and when a citizen is 'capped' on FOI requests for environmental data, it suggests the Planning Authority is not protecting the environment, but protecting a narrative that cannot withstand independent scrutiny.

The Board is requested to conduct a *de novo* review and declare that these works are **not** exempt. The "decimation" of this unique coastal ecosystem cannot continue under the guise of obsolete 2013 screenings.

Mandatory Moratorium on Further Development

The appellant formally requests that An Bord Pleanála impose an immediate moratorium on all new connections to the Strandhill WWTP.

- The Breach of Capacity: The EPA Site Visit Report (SV27364) confirms the plant is failing at current loading levels. To allow further residential or tourism units to

connect to a demonstrably failing system would be a direct violation of Sligo CDP 2024-2030 (Policy P-IU-W-1) and the Precautionary Principle.

- Vested Interest & Overzoning: The Planning Authority has a documented conflict of interest; they are simultaneously the "Developer" of high-budget tourism projects (National Surf Centre/Public Realm) and the "Regulator" of the WWTP. This has led to "overzoning" without the required infrastructure.
- The Legal Mandate: Under the Waddenzee (C-127/02) ruling, where "reasonable scientific doubt" exists as to the absence of adverse effects on a European site, the project cannot proceed. There is no "doubt" here—there is documented failure.
- Conclusion: Until such time as a Stage 2 NIS is completed and a finalized EPA license (Ref: D0163-01) is granted for the actual (not 2013) population equivalent, any further development in Strandhill is unauthorised and environmentally reckless.

Environmental Destruction & Public Safety Risk (The Trail)

The appellant requests an immediate stay on all works of the Killaspugbrone Looped Trail pending a full Health & Safety and Environmental Impact Assessment.

- Destruction of Annex I Habitat: Sligo County Council has drained ancient saltmarshes and imported tonnes of loose stone to facilitate this trail. Draining saltmarsh is a direct violation of the Habitats Directive as these areas provide essential coastal protection and biodiversity. This constitutes a "material change" to a protected landscape that requires a mandatory Stage 2 NIS.
- Public Safety Failure (Tidal Inundation): The trail is regularly submerged by up to 2 feet of water during high, neap, and spring tides without adequate warning systems. Promoting a "national-scale" trail (500,000+ users) that becomes a risk during predictable tidal events is a gross failure of the Council's duty of care.
- The "Loose Stone" Hazard: The use of loose stone fill in a tidal zone is scientifically unsound; these materials wash into the SAC during inundation, causing further siltation and damage to the delicate marine ecosystem.
- Demand for Remediation: The appellant demands that the Board orders the restoration of the saltmarsh and a permanent stay on trail "upgrades" until a transparent Flood Risk Assessment (FRA) is conducted.

Signed: _____ Date: 26/3/26

Appendix I: Statement of Personal & Material Interest

As a primary school teacher in a DEIS Band 1 disadvantaged school, a visual artist, and a poet and a Nature Based Psychotherapist, I have a deep professional and personal connection to this landscape. My work and daily life are centered on the unique character of this area, which I have observed closely for years.

It is heart-wrenching to witness what I consider the deliberate decimation of this delicate ecosystem. From an aesthetic and environmental perspective, the current level of visitors is over the dunes and saltmarshes is unsustainable, the WWTP odour is constantly unbearably noxious. Moreover, the huge over zoning for residential high density development threatens this incredible unique world heritage site of significant natural beauty and ecological sensitivity that cannot be replaced once lost.

1. **Direct Impact: The "Blue Rock" Surfing Area**

   As a resident of Strandhill and a regular user of the coastal amenities, my family and I are directly impacted by the operational failures of the Strandhill WWTP.

- The "Blue Rock" Site: My children and I surf at 'Blue Rock' and the Strandhill Seafront which both of which are situated in close proximity to the WWTP outfall, 'Blue Rock' is located directly opposite the WWTP, less than 100 m from the plant and less than 50 m from the outfall.
- Documented Risk: The EPA Site Visit Report SV27364 (Nov 2023) confirms Ammonia (NH_3) failures during peak summer months. These chemical failures, combined with "pulse loading" from 500,000+ visitors, mean my children are being exposed to effluent that Uisce Éireann has formally admitted is non-compliant with its license.
- Failure of Notification: Despite over a decade of my correspondence with Sligo County Council and the EPA, there is no real-time notification system to warn surfers when the plant is failing its Emission Limit Values (ELVs). This is a fundamental failure of the Precautionary Principle.

2. **Impact on the Shellfish & Marine Economy**

   The WWTP discharge point is less than 1km from the Coney Island Oyster Farm.

- As a member of this community, I have a material interest in the protection of our local marine economy.
- The Sligo CDP 2024–2030 (Policy P-IU-W-1) mandates the protection of "Designated Shellfish Waters." The Council's decision to declare the plant "exempt" while it is actively failing to protect these waters is a direct contravention of their own development plan.

3. **Impact on the SAC Dune System and the Saltmarshes**

   I have witnessed first-hand the "decimation of the dune systems and the saltmarshes caused by unmanaged visitor intensification on the Killaspugbrone Looped Trail.

- The Council's 2025 Public Realm AA Screening finally admits to 500,000+ visitors, yet this Section 5 declaration ignores the physical erosion and habitat loss occurring daily within the SAC (Site 000627).
- The failure to provide physical mitigation or a contemporary Natura Impact Statement (NIS) for this intensification is an affront to the "Best Scientific Knowledge" standard.

Conclusion

I am not merely a "concerned citizen"; I am a parent whose children swim in these waters, a resident who uses these trails, and an advocate who has spent ten years of my life researching and documenting this catastrophic decimation of this delicate ecosystem to provide the State with the evidence it needs to fix this. To declare this "Exempted Development" is to ignore a decade of documented environmental degradation and public health risk.

Please see declaration request on exempted dev. concluding this submission →

To: Planning Department, Sligo County Council, City Hall, Quay Street, Sligo.
Date: 15/02/2026
Subject: Formal Request for Declaration under Section 5 of the Planning and Development Act 2000 (as amended).
Reference Site: Strandhill Wastewater Treatment Plant (WWTP) and Killaspugbrone Looped Trail, Strandhill, Co. Sligo (within Cummeen Strand/Drumcliff Bay SAC - Site Code: 000627).

Pursuant to Section 5 of the Planning and Development Act 2000, I hereby request a formal declaration as to whether the following activities constitute "development" and/or "exempted development" within the meaning of the Act:

- The **physical expansion** and operation of the Strandhill Waste Water Treatment Plant

(Grid Ref: E160611 N336834) beyond its 2007 permitted footprint.

- The **intensification of use** of the Killaspugbrone Looped Trail, currently exceeding 500,000 annual visitors, without contemporary Appropriate Assessment (AA) or physical mitigation.

CONTRAVENTION OF SLIGO CDP 2024–2030

The Sligo County Development Plan 2024–2030 sets out clear mandates for environmental protection that are currently being circumvented:

- **Policy P-BD-2:** Requires the protection and enhancement of habitats identified under the EU Habitats Directive (92/43/EEC). The failure to protect the **Annex II Narrow-mouthed Whorl Snail** from WWTP encroachment directly breaches this policy.
- **Policy P-BD-3:** Mandates that the ecological impact of all development be assessed by qualified professionals taking full account of the **Precautionary Principle**. The reliance on a 2013 Stage 1 AA Screening for a 2021 build is scientifically obsolete and fails the "Best Scientific Knowledge" standard (Case C-127/02, Waddenzee).
- **Policy P-NCODS-4:** Requires an Ecological Impact Assessment (EcIA) for any development likely to have a significant impact on natural habitats. The "pulse" loading from seasonal caravan park residents and major events (e.g., Warriors Run) constitutes such a significant unassessed impact.

3. CORE GROUNDS FOR THE REQUEST

- **Loss of Exemption due to Habitats Directive (Section 4(4)):** Under Irish law, any development that requires an Appropriate Assessment (AA) cannot be considered "exempted development." The EU's Trail Gazer's Project clearly documented habitat degradation at this SAC, proving that an AA is mandatory.
- **Project Splitting & Cumulative Impact:** The Council has failed to conduct a cumulative "in-combination" assessment of the WWTP's failing effluent (EPA License D0163-01) alongside high-intensity tourism (National Surf Centre and Trail). This violates **Article 6(3) of the Habitats Directive**.

- **Water Quality & Commercial Risk:** Discharging untreated or failing effluent within 500m of a **Designated Shellfish Water** and a National Surf Centre violates the Urban Waste Water Directive (91/271/EEC) and Sligo CDP Water Infrastructure Policies.

> The Waste Water Treatment plant's inability to protect the SAC is documented in **EPA Site Visit Report SV27364 (Nov 2023)**, which records Ammonia (NH3) failures during peak tourism months. Uisce Éireann has formally admitted that these failures are caused by 'increased loading from the tourism sector.' This confirms that the 2013 AA Screening is invalid, as it failed to account for the real-world 'pulse' loading and the resulting chemical degradation of the SAC.

Under the Sligo County Development Plan 2024-2030 (Chapter 10: Infrastructure), the Council is bound by **Policy P-IU-W-1**, which mandates compliance with EPA licensing to protect receiving waters.

4. Evidence of Unauthorised Operation & Regulatory Vacuum

- **Licensing Failure:** The Strandhill WWTP is currently operating under **EPA License D0163-01**, which remains in a state of "Review" or "Unauthorised" status for the 2021 capacity upgrades. Operating a plant with increased hydraulic loading (97% population surge) without a finalised, contemporary license is a breach of the **Urban Waste Water Treatment Regulations**.
- **Emission Limit Values (ELV) Breaches:** EPA monitoring records confirm consistent failures in **Ammonia (NH3)** limits. Under **Section 4(4) of the Planning Act**, any development that degrades a European site cannot be "exempt." These chemical failures constitute direct degradation of the **Cummeen Strand/Drumcliff Bay SAC**.
- **The "Legal Vacuum" Argument:** Since the 2007 Part 8 approval is 17 years old and the 2013 AA Screening is scientifically obsolete (pre-dating *People Over Wind C-323/17*), there is no valid legal "shield" for the current operations.

1. Physical Breach: Development Outside Permitted Footprint

The Strandhill Wastewater Treatment Plant (WWTP), as constructed/upgraded in 2021, deviates physically from the footprint authorised under the **2007 Part 8 Planning Approval.**

- **Fact:** The current structure encroaches directly onto the **Cummeen Strand/Drumcliff Bay SAC (Site 000627)**, specifically impacting the habitat of the **Annex II Narrow-mouthed Whorl Snail** (*Vertigo angustior*).
- **Legal Consequence:** Any deviation from a Part 8 approval requires a new planning process. Under **Article 6(3)** of the Habitats Directive, any expansion within an SAC boundary requires a **Stage 2 Appropriate Assessment (Natura Impact Statement)**. A 17-year-old Part 8 does not provide legal cover for a footprint expansion in 2021.

2. The "Scientific Vacuum": Reliance on Obsolete 2013 Screening

The Competent Authority relies on a **Stage 1 AA Screening dated 2013** to justify the 2021 operational capacity.

- **The "Waddenzee" Breach:** The CJEU (Case C-127/02) requires assessments to be based on the "best scientific knowledge in the field." A 2013 screening predates the **97% population surge** in Strandhill and the documented **500,000+ annual visitors** to the Killaspugbrone Trail.
- **The "People Over Wind" (C-323/17) Breach:** The 2013 Screening illegally "screened out" the project by relying on mitigation (treatment efficacy). Current EU law mandates that if mitigation is required, a full Stage 2 AA is compulsory. By failing to perform this, the Council has bypassed the Sligo CDP 2024-2030 Policy P-BD-3.

3. Unauthorised Regulatory Status (EPA License D0163-01)

The plant is currently operating in a regulatory vacuum.

- **Current Status:** The EPA Licensing Portal (Ref: D0163-01) confirms the license for the upgraded capacity is **not finalised/under review**.
- **Environmental Degradation:** The plant is consistently failing **Ammonia (NH3)** emission limits. Under **Section 4(4) of the Planning and Development Act 2000**, the "exempted development" status is **stripped** if the development is likely to have significant effects on a European Site. Ongoing chemical failures within 500m of a **Designated Shellfish Water** and the **National Surf Centre** constitute such effects.

4. Cumulative Impact ("Project Splitting")

The Council has failed to assess the "in-combination" effects of:

1. **The WWTP expansion** (outside the 2007 footprint).
2. **The TrailGazers Pilot Project** (which identifies "significant negative impacts" on dunes).
3. **The National Surf Centre** (introducing high-intensity human exposure to failing effluent). This failure to assess cumulative impact is a direct contravention of **Directive 92/43/EEC** and **Chapter 10 of the Sligo CDP 2024-2030**.

Does the expansion of the WWTP footprint into the SAC, operated under an unfinalised EPA license and based on an obsolete 2013 AA Screening together with the Killaspugbrone Looped Trail constitute development that is not exempt under Section 4(4) of the Planning and Development Act 2000?

Yours faithfully,

Aine Nic Amhlaidh,

Larass, Strandhill, Sligo

Killaspugbrone

Coastal Trail

www.sligowalks.ie

Killaspugbrone

Ascent: **30m**
Length: **6.8km**
Waymarking: **Purple Arrows**
Grade: **Moderate**
OSI Map: **25**
Services: **Strandhill**
Terrain: **Beach/Forest Trail/Road**
Duration: **1.5 hours**
Minimum gear: **Sturdy walking boots, raingear**

Please Note that the property traversed on this route is private and access is available by kind permission of the landowners. Note that sections of this walk are adjacent to Sligo Airport and its important to stay on the designated paths. The airport runway, apron and lands are private property and should not be accessed by walkers. 24 hour emergency access is required - stay off the runway, it can save lives. Beware of airplanes in flight, and stay clear of the runway flight path when airplanes are in motion.

Sligo
Sets your spirit free

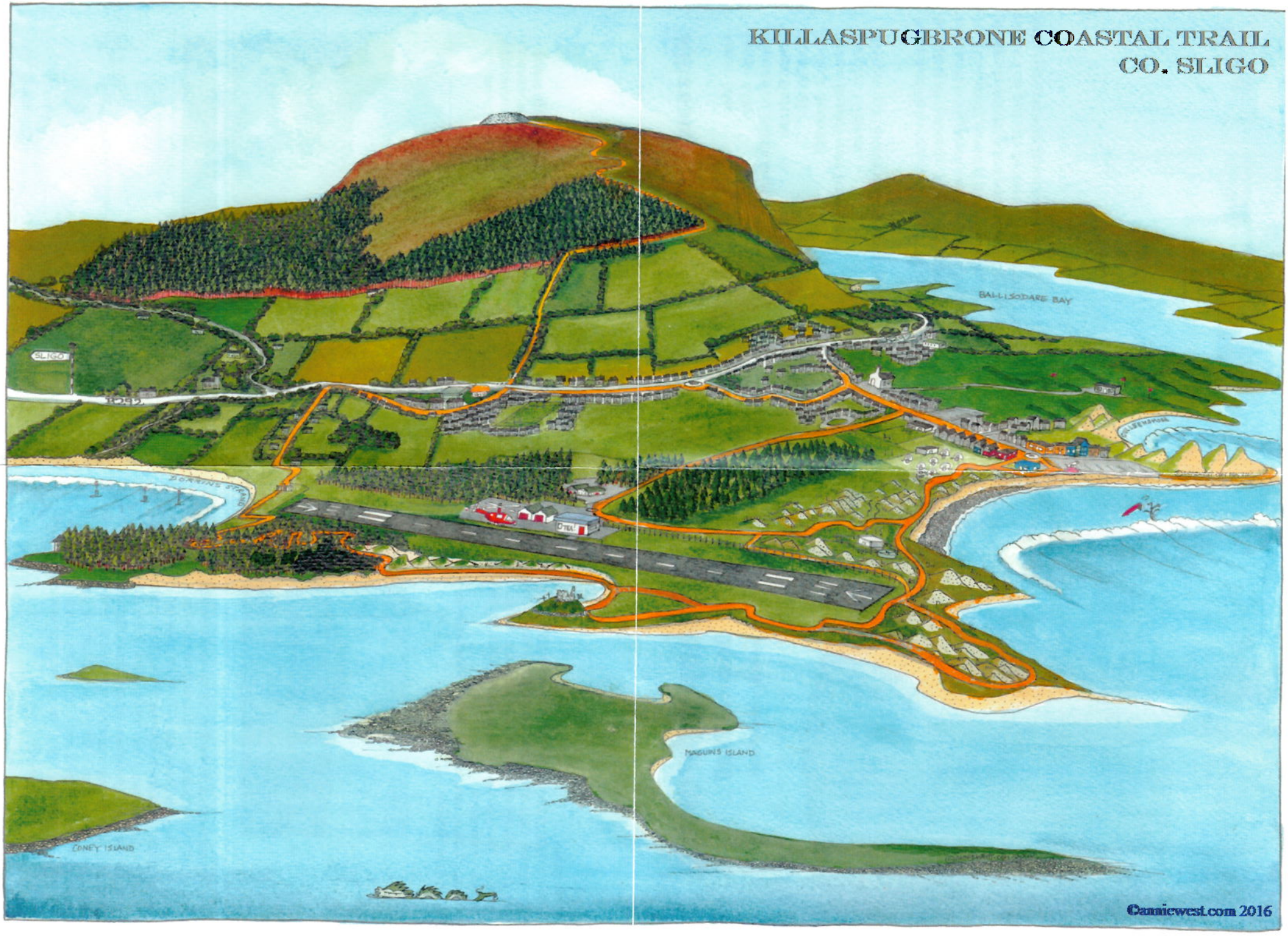
Sligo County Council
Comhairle Chontae Shligigh

SLIGO
CARAVAN & CAMPING

Description
This is a stunning coastal walk through the North of the dune system in the busy seaside village of Strandhill. The trail brings walkers through a variety of coastal habitats including sand dunes, salt marsh and pine woodland. It passes by Killaspugbrone Church, an early Christian site with historic and legendary associations.
The route features some magnificent views of Benbulben and Knocknarea and out over Sligo Bay.

The Route
From the promenade at the sea-front, the trail leads the walker in a loop along the shore line, past the airport run-way, over to Killaspugbrone and back to the village via Dorrins Strand. There are longer and shorter options along the route – including the 'Via headland' route which takes the walker along the exposed Killaspug point, which is 6.8km in total or the shorter option along the end of the run-way (6.2km in total). Sturdy footwear is recommended for the route around Killaspug Point as some of the trail is over un-even terrain. There is also the option to turn right just before the kissing gate (on the Strandhill side) to return along a shorter option via the airport road (marked airport loop). The trail includes a short ascent of 30m and is suitable for family groups.

Did you know?
Killaspugbrone church was founded by Saint Patrick in the fifth century. According to local folklore, when Saint Patrick visited the site he tripped on rough ground and lost his tooth. The gold relic is now preserved in the National Museum of Ireland. The present ruins dates to the period between 1150 and 1220.


KILLASPUGBRONE COASTAL TRAIL
CO. SLIGO
BALLISODARE BAY
SLIGO
DOONIS STRAND
O'TEA'
MAGUIN'S ISLAND
CONEY ISLAND
©anniewest.com 2016

Knocknarea

Mountain Trail

www.sligowalks.ie

Description: Knocknarea dominates the skyline of west Sligo and is well known for its huge flat topped cairn which is believed to be the resting place of the legendary Queen Maeve of Connacht. The tomb has been classified as a Neolithic passage tomb and is estimated to be the largest in Ireland outside of the Boyne Valley measuring some 55 meters across and 10 meters in height. A large number of hut sites have also been found. This is a very rewarding climb with spectacular views in all directions, including the Ox Mountains, Lough Gill, and Slieve League in Donegal and on a clear day Croagh Patrick in the west.

The Route: The walk begins at the base of the mountain in the car park. Follow the path from the car park up the hill. The walk gets steeper from the kissing gate and continues up to the cairn, returning by the same route. The terrain is quite steep and rugged as you move closer to the summit. Care is advised when descending from the mountain as it may be slippery underfoot , particularly following wet weather.

Did you know? Queen Maeve of Connacht was the daughter of a former High King of Ireland, King Eochaid. Maeve was a jealous woman: according to legend as a young girl she killed her own sister over a row concerning a man. We are told that Maeve was married many times. In fact some historians believe that Maeve was not a real person at all but a goddess of sovereignty and that in order for a man to become king he had to symbolically marry Maeve the goddess.

Knocknarea

Ascent: **329m**
Length: **2.5km**
Time: **1 Hour**
Grade: **Strenuous!**
Minimum Gear: **Sturdy walking/trekking shoes, phone and fluids**
OSI Map: **Series 25**
Services: **Strandhill**
Terrain: **Mountain trail**
Waymarking: **Red arrows**

Please note: The property traversed by this route is private and access is available by the kind permission of the landowners. **Dogs are not permitted on this walk** due to the presence of grazing sheep and lambs.

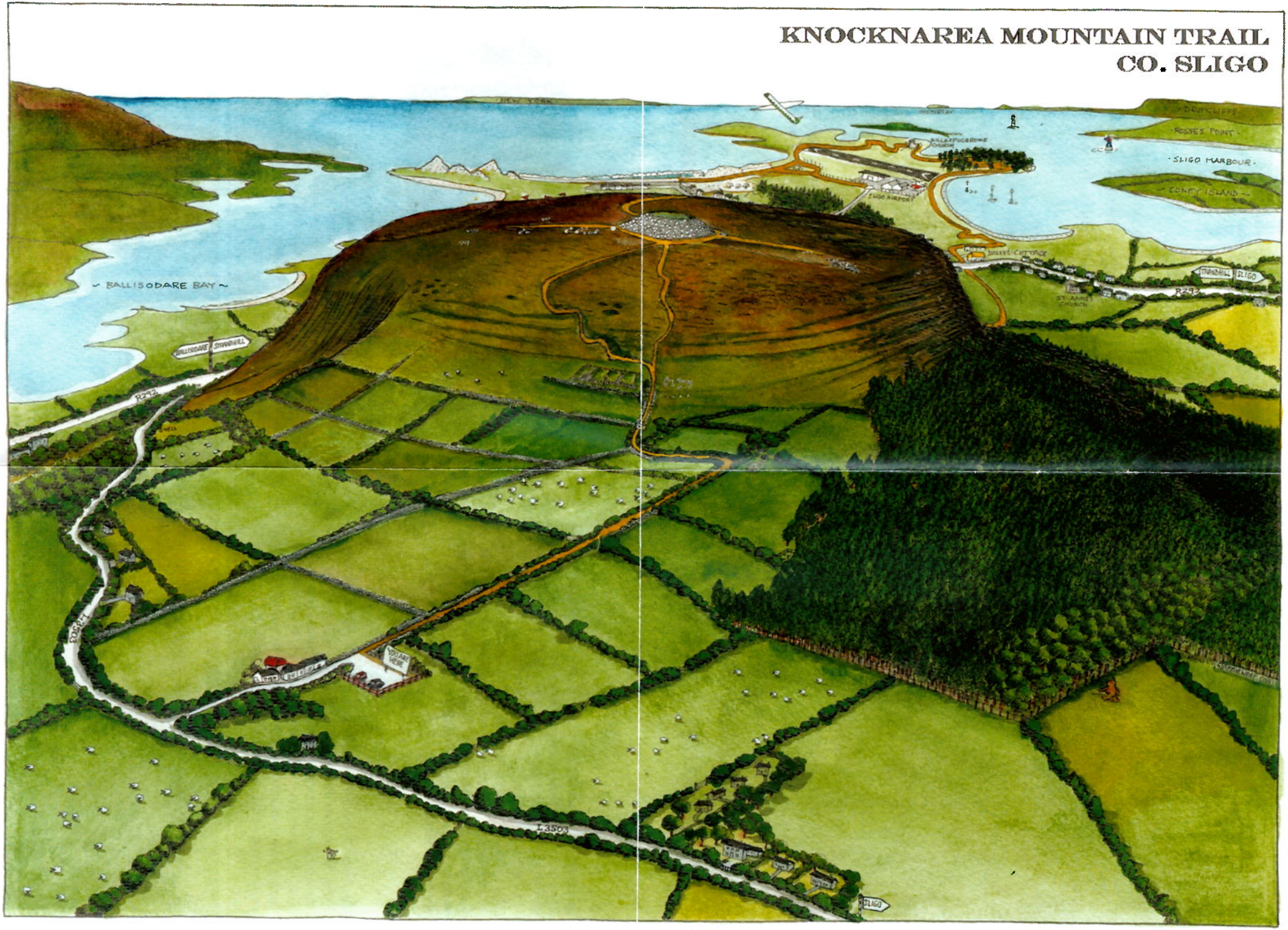
The summit and its surrounds once constituted a sacred burial place to people in this area and should be treated with dignity and respect. **Please do not climb the cairn.**

Sligo
Sets your spirit free

Sligo County Council
Comhairle Chontae Shligigh

SLIGO
CARAVAN & CAMPING

KNOCKNAREA MOUNTAIN TRAIL
CO. SLIGO



Queen Maeve

Mountain Trail

www.sligowalks.ie

Description

Description: Knocknarea dominates the skyline of west Sligo and is well known for its huge flat topped cairn which is believed to be the resting place of the legendary Queen Maeve of Connacht. The tomb has been classified as a Neolithic passage tomb and is estimated to be the largest in Ireland outside of the Boyne Valley measuring some 55 metres across and 10 metres in height. A large number of hut sites have also been found. This is a very rewarding climb with spectacular views in all directions, including the Ox Mountains, Lough Gill, and Slieve League in Donegal and on a clear day Croagh Patrick in the west.

The Route: The walk begins at the base of the mountain in the car park at Sligo Rugby Club. Follow the path from the car park up the hill. The walk gets quite steep, includes timber steps and continues up to the cairn. Continue past the cairn, down the path to Knocknarea Carpark and then on around back to start at Strandhill. **Care is advised when descending from the mountain as it may be slippy under foot, particularly following wet weather.**

Did you know? Queen Maeve of Connacht was the daughter of a former High King of Ireland. King Eochaid. Maeve was a jealous woman; according to legend as a young girl she killed her own sister over a row concerning a man. We are told that Maeve was married many times. In fact some historians believe that Maeve was not a real person at all but a goddess of sovereignty and that in order for a man to become king he had to symbolically marry Maeve the goddess.

Queen Maeve Trail

Ascent: **329m**
Length: **7km**
Time: **3 Hours**
Grade: **Strenuous!**
Minimum Gear: **Sturdy walking/trekking shoes, phone and fluids**
OSI Map: **Series 25**
Services: **Strandhill**
Terrain: **All weather hard surface and timber steps**
Waymarking: **Red arrows**

Please note: The property traversed by this route is private and access is available by the kind permission of the landowners. **Dogs are <u>not</u> permitted on this walk** due to the presence of grazing sheep and lambs.

The summit and its surrounds once constituted a sacred burial place to people in this area and should be treated with dignity and respect.

Please do not climb the cairn.

Sligo
Sets your spirit free

Sligo County Council
Comhairle Chontae Shligigh

SLIGO
CARAVAN & CAMPING

WEST SLIGO
THE GLEN
CLIFFONEY
CARROWMORE
KNOCKNAGUR
SIBERIA
RANGE EAST
RATHCARRICK
SLIGO
STRANDHILL
R.292
TO SLIGO
TO KILLAVOGEE
UPPER STRANDHILL
SLIGO RUGBY CLUB
GOLF CLUB
DUNEMORE POINT
ainniewest.com

Sligo Walks

Directions to the Trailhead

This trail is located in the seaside village of Strandhill located 9km west of Sligo town on the R292. The route starts from the promenade at the sea-front (beside the cannon). Park at the nearby main public car park and walk down to the promenade from there. Alternatively, take the S2 bus across from Sligo Bus Station, which also drops you at the main car park. For timetables click here.

The Trail Map:- OSI Map Series 25

This is a stunning coastal walk through the dune system in the busy seaside village of Strandhill. The trail brings walkers through a variety of coastal habitats including sand dunes, salt marsh and pine woodland. It passes by Killaspugbrone Church, an early Christian site with historic and legendary associations. The route features some magnificent views of Benbulben and Knocknarea and out over Sligo Bay.

Killaspugbrone Coastal Walk



Walk Category: Coastal Walk
Walk Grade: Moderate
Walking Terrain: Beach, Forest Trail
Waymarking: Purple Arrows
Trailhead: Strandhill Village
Dogs: Allowed on lead

Length: 6.8km
Ascent: 30m
Time: 2hrs
Suggested Gear: Trainers
Longitude: 54.269680
Latitude: -8.610065


KILLASPUGBRONE COASTAL TRAIL
CO. SLIGO

The Route

From the promenade at the sea-front, turn right along a path which leads through Strandhill Caravan & Camping Park. Keeping towards the shoreline, sandy trails lead through a kissing gate and the end of the runway at Strandhill Airport. From here the trail veers right towards Killaspugbrone Church and on to a beautiful crescent shaped beach. At the end of the beach a red and white marker stands, indicating where the walker should turn right, through some woodland and on to the estuary at Dorrins Strand. The stone path leads to a road, which makes its way uphill and into the village. From here, keep right and you return to the seafront.

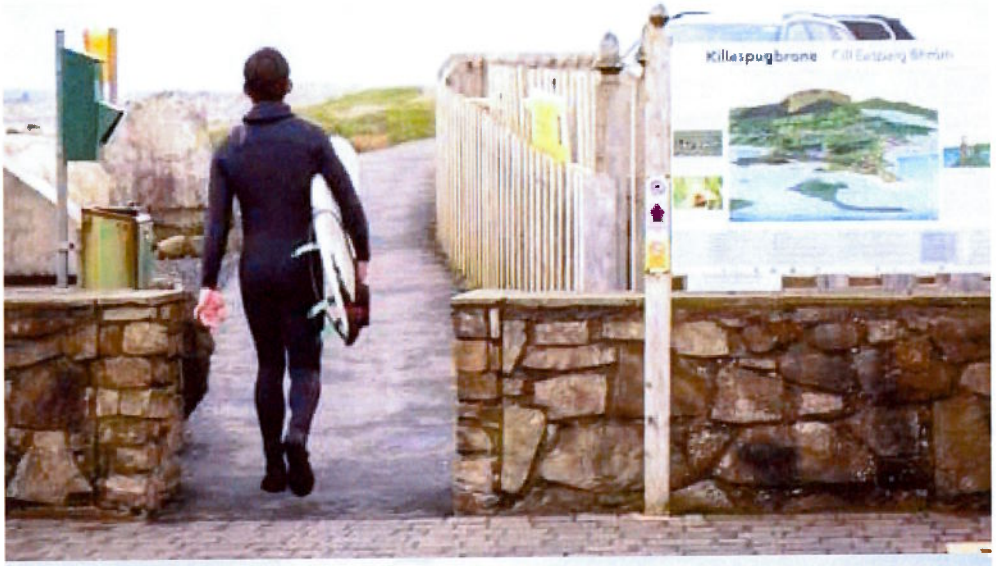
Did You Know?

Killaspugbrone church was founded by Bishop Bronus, a follower of Saint Patrick in the fifth century. According to local folklore, when Saint Patrick visited the site he tripped on rough ground and lost his tooth. The gold relic is now preserved in the National Museum of Ireland (although the ancient relic has long been lost). The present ruins date to the period between 1150 and 1220.

Trail Grade – Moderate

These trails may have some climbs and may have an uneven surface where the going is rough underfoot with some obstacles such as protruding roots, rocks, etc. The routes are appropriate for people with a moderate level of fitness and some walking experience. Specific outdoor walking footwear and clothing is recommended.


KILLASPUGBRONE COASTAL WALK
Sligo
Killaspugbrone Church
Nun's Beach
Dorrins Strand
Waymarked Trail
Dolly's Cottage
P
P
Cannon
Queen Maeve's Cairn Knocknarea


Killespugbrone



COMHAIRLE CONTA
ÁRAS CONTAE COIS A

+353 71 911 1111
+353 71 914 1119
info@sligococo.ie
www.sligococo.ie

ED 628
Killaspugbrone
& WWTP

12/03/2026

File Ref: ED 628/FL/CP

Aine Nic Amhlaidh
Larass
Strandhill
Co. Sligo

Re: Application for exemption in accordance with Section 5 of the Planning and Development Act 2000 (as amended) in respect of: 1. The physical expansion and operation of the Strandhill Wastewater Treatment Plant beyond its 2007 permitted footprint. 2. The intensification of use of the Killaspugbrone Looped Trail, currently exceeding 500,000 annual visitors, without contemporary Appropriate Assessment (AA) or physical mitigation at Killaspugbrone, Strandhill, Co. Sligo.

I enclose herewith a declaration in accordance with Section 5 of the Planning and Development Act, 2000 (as amended) in respect of the following:

Name & Address of Applicant: Aine Nic Amhlaidh, Larass, Strandhill, Co. Sligo.

Declaration Requested for:
1. The physical expansion and operation of the Strandhill Wastewater Treatment Plant beyond its 2007 permitted footprint.
2. The intensification of use of the Killaspugbrone Looped Trail, currently exceeding 500,000 annual visitors, without contemporary Appropriate Assessment (AA) or physical mitigation.

Declaration Provided for:
1. The physical expansion and operation of the Strandhill Wastewater Treatment Plant beyond its 2007 permitted footprint.

Non-Development:
2. The intensification of use of the Killaspugbrone Looped Trail, currently exceeding 500,000 annual visitors, without contemporary Appropriate Assessment (AA) or physical mitigation.

Location: Killaspugbrone, Strandhill, Co. Sligo.

File Reference: ED 628

Application Received: 16/02/2026

Sligo.

Where a Declaration is issued under this Section, any persons may, on payment to An Coimisiún Pleanála of such fee as may be prescribed, refer a declaration for review to the Coimisiún within four weeks of the date of issuing of the declaration by Sligo County Council.

Signed on behalf of Sligo County Council

pp. _____

Aisling Smyth
Administrative Officer
PLANNING SECTION

Sligo.

From: Emer Concannon
To: Planning Emails
Subject: RE: ED628 - Aine Nic Amhlaidh - Decision Due 16 March, 2026 (For DOS Review and Signature)
Date: Wednesday 11 March 2026 21:53:27
Attachments: image024.png
image025.png
image026.png
image027.png
image030.png
image033.png
image034.png
image040.png
image041.png
image042.png
image043.png

D628 - Aine Nic Amhlaidh signed on 11/03/2026.

Regards,

Emer

Emer Concannon

Director of Services / *Stiúrthóir Seirbhísí Gníomhach*
Placemaking & Ballymote-Tubbercurry Municipal District / *Comhfhorbairt Áite & Ceantar Bardasach Bhaile an Mhóta - Thobar an Choire*

Sligo County Council / *Comhairle Contae Shligigh*
City Hall, Quay Street, Sligo F91 PP44 / *Halla na Cathrach, Sráid na Cé, Sligeach F91 PP44*

071 9114411
econcan@sligococo.ie
sligococo.ie | sligo.ie

Sligo County Council
Comhairle Chontae Shligigh
Sligo.

From: Planning Emails <planning@sligococo.ie>
Sent: Wednesday 11 March 2026 15:18
To: Emer Concannon <econcannon@sligococo.ie>
Cc: Planning Emails <planning@sligococo.ie>
Subject: FW: ED628 - Aine Nic Amhlaidh - Decision Due 16 March, 2026 (For DOS Review and Signature)

Hi Emer,

Further to above Exempted Development Application, the decision is due 16th March, 2026. Please see the following file link for your review:

P:\Exempted Development\2026\07. ED628 Aine NicAmhlaidh (DECISION DUE 16

MAR '26)

Item requiring your signature is No 09 '*CE Order for DOS Signature*'.

When completed, please advise by reply email to planning@sligococo.ie.

Many Thanks
Aisling

Aisling Smyth
Oifigeach Riaracháin
Administrative Officer
Rannóg Pleanála
Planning Section

Comhairle Chontae Shligigh, Halla na Cathrach, Sráid na Cé, Sligeach. F91 PP44
Sligo County Council, City Hall, Quay Street, Sligo, F91 PP44

+353-71-9114440
asmyth@sligococo.ie
sligococo.ie | sligo.ie

Sligo County Council
Comhairle Chontae Shligigh
Sligo.

From: Planning Emails <planning@sligococo.ie>
Sent: Wednesday 11 March 2026 13:29
To: Planning Emails <planning@sligococo.ie>
Subject: FW: ED628 - FINAL REPORT SIGNED

CE Order updated and saved in folder for signature:-

P:\Exempted Development\2026\07. ED628 Aine NicAmhlaidh (DECISION DUE 16 MAR '26)

Kind regards,

Caroline Pease
Planning Department
Sligo County Council
City Hall, Quay Street, Sligo, F91 PP44.

+353-71-911 4456
cpease@sligococo.ie
sligococo.ie | sligo.ie

From: Ian Bailey <IBailey@sligococo.ie>
Sent: Wednesday 11 March 2026 09:02
To: Planning Emails <planning@sligococo.ie>; Barry Ward <bward@sligococo.ie>
Cc: Caroline Pease <cpease@sligococo.ie>
Subject: RE: ED628 - FINAL REPORT SIGNED

Also a couple of minor changes

Ian Bailey
Pleanálaí Feidhmeannach Sinsearach
Senior Executive Planner

From: Planning Emails <planning@sligococo.ie>
Sent: Tuesday 10 March 2026 12:02
To: Ian Bailey <IBailey@sligococo.ie>; Barry Ward <bward@sligococo.ie>
Cc: Caroline Pease <cpease@sligococo.ie>
Subject: FW: ED628 - FINAL REPORT SIGNED

Ian/Barry,

Please see the CE Order Declaration under Part V for your review before sending to Emer for signature,

Any changes can you let us know,

Thanks
Fidelma

From: Caroline Pease <cpease@sligococo.ie>
Sent: Monday 9 March 2026 15:28
To: Planning Emails <planning@sligococo.ie>
Subject: RE: ED628 - FINAL REPORT SIGNED

Hi Fidelma,

Ian offered for he and Barry to review these documents as they are not standard responses:-

Docs drafted:-

09. Draft CE Order
10. Draft Letter

P:\Exempted Development\2026\07. ED628 Aine NicAmhlaidh (DECISION DUE 16 MAR '26)

Kind regards,

Caroline Pease
Planning Department
Sligo County Council
City Hall, Quay Street, Sligo, F91 PP44.

+353-71-911 4456
cpease@sligococo.ie
sligococo.ie | sligo.ie

From: Ian Bailey <IBailey@sligococo.ie>
Sent: Monday 9 March 2026 09:20
To: Planning Emails <planning@sligococo.ie>
Subject: ED628 - FINAL REPORT SIGNED

The PLANNERS REPORT has been signed and saved:

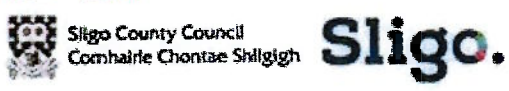
P:\Exempted Development\2026\07. ED628 Aine NicAmhlaidh (DECISION DUE 16 MAR '26)

Regards

Ian Bailey
Pleanálaí Feidhmeannach Sinsearach
Senior Executive Planner

Comhairle Chontae Shligigh
Halla na Cathrach, Sráid na Cé, Sligeach F91 PP44
Sligo County Council
City Hall, Quay Street, Sligo. F91 PP44

+353-71-9114491
ibailey@sligococo.ie
sligococo.ie | sligo.ie



COMHAIRLE CONTAE SHLIGIGH
ÁRAS CONTAE COIS ABHAINN SLIGEACH

SLIGO COUNTY COUNCIL
COUNTY HALL RIVERSIDE SLIGO

+353 71 911 1111
+353 71 914 1119

info@sligococo.ie
www.sligococo.ie

17/02/2026

Wastewater
SAC

Ref: ED 628/FL/CP

Registered Post
Aine Nic Amhlaidh
Larass
Strandhill
Co. Sligo

Re: Application under Section 5 of the Planning and Development Act 2000 (as amended)

To Whom It Concerns,

The Planning Authority wish to acknowledge receipt of your application for Exempted Development, under Section 5 of the Planning and Development Act 2000 (as amended) which was received on 16/02/2026.

Yours sincerely,

pp. C. Pease

Aisling Smyth
Administrative Officer
Planning Section

Sligo.

SLIGO COUNTY COUNCIL
COUNTY HALL,

MERCHANT ID:			*****5023
TERMINAL ID:			*******2308
DATE:	16/02/2026	TIME:	15:39
BATCH:	000697-001	INVOICE:	003480
RRN:	110009322024	AUTH NO.:	ZDFXQU
MC Debit			**SALE**
************4541			*

SALE AMOUNT **€80.00**

CUSTOMER NOT PRESENT

I agree to pay the above final amount
According to the card/merchants issuer
agreement

CUSTOMER COPY

0045725

SLIGEACH
17.02.26

Éire
POSTAS 1000 IOCTHA
FP210141

SÍNIÚ / SIGNATURE REQUIRED

RegisteredPost

Síniú Riach. / Sig Req.
RL 5432 6502 6IE
DELIVERED
ATTEMPTED DELIVERY
SEACHADTA
Síniú Riach. / Sig Req.
RL 5432 6502 6IE
RL 5432 6502 6IE
Scanadh / Scan
Síniú / Signature
GLACADH AN CHUSTAIMÉARA
CUSTOMER ACCEPTANCE
TAGAIRT CUSTAIMÉARA
CUSTOMER REFERENCE
an post

Appendix: Evidence & Reference Checklist

- [ ] **Application Fee:** A cheque or postal order for **€220** made payable to *An Bord Pleanála*.
- [✓] **Local Authority Decision:** A copy of the **Section 5 Declaration** letter issued to you by Sligo County Council.
- [✓] **Exhibit A: Evidence of Historical Negligence (Minutes):** Enclosed Council Minutes from **November 2016, December 2016, and January 2017**. These prove the WWTP concerns were tabled three times and ignored by the Planning Authority.
- [ ] **Exhibit B: Environmental Failure (EPA Report): EPA Site Visit Report SV27364 (Nov 2023).** This provides the "best scientific knowledge" that the plant is failing due to "increased loading from the tourism sector."
- [✓] **Exhibit C: The Data Contradiction (2025 Public Realm):** Reference to the **AA Screening Report – LUC – February 2025** (Strandhill Public Realm Enhancement). This confirms the Council's internal acknowledgment of **500,000+ annual visitors**, contradicting their 2013 WWTP baseline.
- [✓] **Exhibit D: Procedural Obstruction (FOI Denial):** The formal letter from Sligo Co Co stating you have **exceeded your limit for FOI requests** and the record of the "deleted" CCTV/missing **Chapter 4.5 of the 2013 Mini Plan**.
- [ ] **Exhibit E: Tidal Hazard & Habitat Damage:** [If you have them] Photos of the **Killaspugbrone Trail submerged** and the **loose stone fill** placed on the drained saltmarshes.

Rebuttal of Director of Services Letter dated 23rd July 2021

The Director of Services' letter (attached) confirms the Planning Authority's flawed approach. It attempts to shield the project using 10,000 PE EIA thresholds while ignoring mandatory AA requirements for the SAC. Furthermore, the claim of 'future-proofing' is scientifically debunked by the 2023 EPA failure reports. The Council's admission that they ignored the Mini-Plan population targets further proves that this development is not 'plan-led' but is being managed through a series of ad-hoc, unassessed expansions.

1. The "Future-Proofing" Paradox

The Director claims the plant was "future-proofed" to meet growth over the "life of several plans."

- **The Contradiction:** If the plant was built for "future" growth in 2007/2013, why does the **2023 EPA Report (SV27364)** confirm it is already failing due to "increased loading"?
- **The Argument:** "Future-proofing" is a hollow claim if the actual, current loading (the 500,000 visitors mentioned in the 2025 Public Realm report) has already overwhelmed the system. Their "future" has arrived, and the infrastructure has failed.

2. The 10,000 PE Threshold

The letter states an **Environmental Impact Assessment (EIA)** was not needed because the plant is below the 10,000 Population Equivalent (PE) threshold.

- **The Anomaly:** While 10,000 PE is the threshold for a mandatory EIA, it is **NOT** the threshold for an **Appropriate Assessment (AA)**.
- **The Argument:** Under the **Habitats Directive**, a project of any size (even 1 PE) requires a Stage 2 NIS if it has a likely significant effect on an SAC. The Director is using EIA thresholds to distract from the fact that they failed to do a valid, post-People Over Wind AA for the SAC-protected snail habitat.

3. The 2007 vs. 2021 Footprint Discrepancy

The letter relies entirely on a **2007 Part 8** approval for a 4,500 PE plant.

- **The Anomaly:** You have evidence that the **2021 upgrades** extended the physical footprint beyond the 2007 boundaries into the SAC.

- **The Argument:** A 2007 approval for "X" does not give the Council a "blank check" to build "X+Y" in 2021. Any expansion outside the 2007 red-line boundary is **unauthorised development** and cannot be "exempted" by referring back to a 14-year-old document.

4. Ignoring the "Current Mini-Plan"

The Director explicitly states that capacity "would not be based on the population targets set out in the current mini-plan."

- **The Anomaly:** This is a stunning admission. Planning must be "plan-led." If the Council is ignoring its own Mini-Plan targets for the WWTP, they are operating in a **regulatory vacuum**.
- **The Argument:** By their own admission, the Council has decoupled the WWTP capacity from the statutory planning framework. This proves the "lack of transparency cited regarding the missing **Chapter 45** of the Strandhill Mini Plan from the Co. Sligo Development Plan, 2011-2017.

COMHAIRLE CHONTAE SHLIGIGH
HALLA NA CATHRACH SLIGEACH

SLIGO COUNTY COUNCIL
CITY HALL SLIGO

+353 71 911 1111
+353 71 911 4499

info@sligococo.ie
www.sligococo.ie

WWTP.

Dorothy Clarke
Director of Services

23rd July 2021

Dear Ms McKirdy

I acknowledge receipt of your complaint in relation to the development of the Strandhill Wastewater Treatment Plant. In particular, you question why a Part 8 set out under Article 80(1) of the Planning and Development Regulations was not undertaken.

A Part 8 was undertaken by Sligo County Council in 2007 in respect of the proposed development of a new wastewater treatment plant of 4,500 PE to serve the village of Strandhill. The public consultation process on this Part 8 was carried out between 6th June and 25th July 2007. An Environmental Impact Assessment was not carried out for this proposed development. Please note that the Seventh Schedule to the Planning and Development Act sets out the thresholds for infrastructural development which require the undertaking of Environmental Impact Assessment. The schedule indicates that a wastewater treatment plant with a capacity greater than a population equivalent of 10,000 requires an Environmental Impact Assessment. Accordingly, the proposed upgrade to the existing treatment plant at Strandilll was significantly below the mandatory threshold i.e. an EIA was not required.

With regard to the capacity of the constructed plant, this would not be based on the population targets set out in the current mini-plan but would have incorporated a degree of 'future proofing' to ensure that the plant is sized to meet the population growth of Strandhill over the life of several plans.

Kind Regards,

Dorothy Clarke
Director of Services
Planning, Community & Economic Development, Arts & Culture

No provision made for implementation of Draft Plan

Gmail

Ann McKirdy <ainenicamhlaidh@gmail.com>

Letter from Dorothy Clarke re development of the Strandhill Wastewater Treatment Plant

8 messages

Karen Reynolds <kreynolds@sligococo.ie> Fri, Jul 23, 2021 at 2:35 PM
To: "ainenicamhlaidh@gmail.com" <ainenicamhlaidh@gmail.com>

Dear Ms McKirdy,

Please find attached letter from Dorothy Clarke, Director of Services in relation to the development of the Strandhill Wastewater Treatment Plant.

Kind Regards,

Karen Reynolds

(On behalf of Dorothy Clarke)

Comhairle Contae Shligigh

City Hall | Quay Street | Sligo

Tel: +353 71 911 4410

Email: kreynolds@sligococo.ie

Sligo County Council
Comhairle Chontae Shligigh

Sligo.

Letter to Ms McKirdy 23.07.21.pdf
527K

Ann McKirdy <ainenicamhlaidh@gmail.com> Sat, Jul 24, 2021 at 7:40 AM
To: Karen Reynolds <kreynolds@sligococo.ie>, Dorothy Clarke <dclarke@sligococo.ie>, Tom Kilfeather <tkilfeather@sligococo.ie>

Dear Ms. Clarke,
I refer to your correspondence (attached) in response to the formal complaint I submitted to Mr. Kilfeather and do not agree with your assessment that an Environmental Impact Assessment is not required for this development in the Special Area of Conservation in Strandhill which is protected under EU law.

"A Part 8 was undertaken by Sligo Co. Co in **2007** in respect of the proposed development of a new wastewater treatment plant of 4,500 PE to serve the village of Strandhill." (D. Clarke, 23/7/21)

This Part 8 which you refer to from 2007, was undertaken 14 years ago, and is not valid given the fact that Planning Permission is time limited, which, as Director of Planning for Sligo Co. Co., I am sure you are aware.

Secondly, I am perplexed how a proposal to upgrade the former facility to a capacity of 4,500 PE was sanctioned when the population in Strandhill per the census 2006 was 1,413 persons. This would suggest a forecasted increase of 318% which given the geographic and infrastructural constraints owing to the special amenity status of Strandhill and the development limits imposed by the protection status of the Special Areas of Conservation and Heritage Sites, exceeds any reasonable population target increase - EVER.

This also conflicts with the National Planning Framework which limits development to key support towns. The most recent submission to the Draft Amendment to the Sligo Development Plan 2017-2023 by the Office of the Planning Regulator reiterated the fact that Strandhill is ***not*** a Key Support Town, thus, this development is not in keeping with the National Planning Framework policies.

Your justification for not carrying out an EIA due to the capacity of the wastewater treatment plant falling below the threshold of 10,000 is completely erroneous. EU Law mandates that all development in or adjacent to an SAC undertakes an Environmental Impact Assessment.

Moreover, your letter states;

> 'The Seventh Schedule to the Planning and Development Act sets out the thresholds for infrastructural development which require the undertaking of an EIA. The schedule indicates that a wastewater treatment plant with a capacity greater than a population equivalent of 10,000 requires an EIA. Accordingly, *the proposed* upgrade to the existing treatment plant at Strandhill was significantly below the mandatory threshold i.e. an EIA was not required.

Your letter refers to the original proposed upgrade to facilitate the development of a new wastewater treatment plant with a PE of 4,500 in 2007. These are two distinct and separate proposals.

Sligo Co. Co. has a legal obligation under EU Law to comply with the protection status of the Special Areas of Conservation and undertake an Environmental Impact Assessment for every development proposal in or adjacent to the SAC.

My formal complaint has not been addressed, please explain why an Environmental Impact Assessment was not carried out for this Wastewater Treatment Plant upgrade in the Special Area of Conservation, Killaspugbrone and why a Part 8 was not undertaken for this development contracted in November 2017 and commenced in February 2018.

Yours sincerely,
Ann McKirdy

[Quoted text hidden]

Ann McKirdy <ainenicamhlaidh@gmail.com> Fri, Nov 12, 2021 at 9:30 PM
To: sinead maguire <sineadmaguire@yahoo.com>

FYI
[Quoted text hidden]

Letter to Ms McKirdy 23.07.21.pdf
527K

Ann McKirdy <ainenicamhlaidh@gmail.com> Sun, Nov 28, 2021 at 12:27 AM
To: AnneMarie.OConnor@opr.ie

Response from Ms. D. Clarke re. upgrade to Sewage Treatment Plant

---------- Forwarded message ---------
From: **Karen Reynolds** <kreynolds@sligococo.ie>
Date: Fri, Jul 23, 2021 at 2:35 PM
[Quoted text hidden]

[Quoted text hidden]

Letter to Ms McKirdy 23.07.21.pdf
527K

Ann McKirdy <ainenicamhlaidh@gmail.com> Sat, Jan 8, 2022 at 11:34 PM
To: "Info@opr.ie" <info@opr.ie>

21-253-11-OPR
[Quoted text hidden]

Ann McKirdy <ainenicamhlaidh@gmail.com> Tue, Oct 4, 2022 at 9:19 PM
To: heritage@antaisce.org

Dear Ian,
This is a separate issue but a shocking indictment of how Sligo Co. Co. has tried to cover their negligence in compliance with EU Law for Special Areas of Conservation and Waste Management.
Please advise,
Thank you,
Kindest regards,
Ann McKirdy

---------- Forwarded message ---------
From: **Ann McKirdy** <ainenicamhlaidh@gmail.com>
Date: Sat, Jul 24, 2021 at 7:40 AM
Subject: Re: Letter from Dorothy Clarke re development of the Strandhill Wastewater Treatment Plant
To: Karen Reynolds <kreynolds@sligococo.ie>, Dorothy Clarke <dclarke@sligococo.ie>, Tom Kilfeather <tkilfeather@sligococo.ie>

[Quoted text hidden]

Ann McKirdy <ainenicamhlaidh@gmail.com> Sun, Mar 12, 2023 at 8:26 PM
To: Ann McKirdy <ainenicamhlaidh@gmail.com>

[Quoted text hidden]

Ann McKirdy <ainenicamhlaidh@gmail.com> Wed, Jan 24, 2024 at 8:56 PM
To: Ann McKirdy <ainenicamhlaidh@gmail.com>

[Quoted text hidden]

Letter to Ms McKirdy 23.07.21.pdf
527K

2950 P.E. Misce

WWTP Contradiction Dec 2016 2950pe

Exhibit A

Gmail

...016

...mckirdy@gmail.com>

Fwd: Upgrading of sewage plant ... motion for Sligo County Council Meeting - 7...

2 messages

Sinead Maguire <sineadmaguire@yahoo.com>
To: Ann McKirdy <annmckirdy@gmail.com>

...ec 6, 2016 at 12:31 PM

Hi Ann

I have attached below the reply eventually received from Irish water regarding my queries about the adequacy of the proposed upgrade of the treatment plant which I thought might interest you.

Thank you for forwarding the letter regarding funding for footpaths in Strandhill. I had hoped it would be more money and think that the council will probably be in a position to say they have spent that amount but I will follow it up.

Kind regards

Sinéad Maguire

2950PE 2016!

Sent from my iPhone

Begin forwarded message:

From: Jo Anne McGonigle <jmcgonigle@sligococo.ie>
Date: 6 December 2016 at 12:25:02 GMT
To: Sligo County Council Members <members@sligococo.ie>
Subject: FW: Upgrading of sewage plant at Strandhill, Co. Sligo (Notice of motion for Sligo County Council Meeting - 7th November, 2016)

Dear Councillor,

Further to continued follow up by Mr. T. Kilfeather, Director of Services, please see reply received from Irish Water this morning.

Kind regards,

Contradiction

Jo-Anne

From: localrepsupport [mailto:localrepsupport@water.ie]
Sent: 06 December 2016 11:08
To: Jo Anne McGonigle
Cc: meetings
Subject: RE: Upgrading of sewage plant at Strandhill, Co. Sligo (Notice of motion for Sligo County Council Meeting - 7th November, 2016)

Dear Ms McGonigle,

Thank you for your email on behalf of the Members of Sligo County Council, regarding the upgrade of the sewage plant at Strandhill.

Please accept our apologies for the delay in resolving this query and for any inconvenience this may have caused.

Capacity at the Strandhill Wastewater Treatment Plant is being upgraded from 1,500p.e. to 3,700.

The upgraded plant will also be designed to meet a higher level of treatment that will improve its current environmental impact on the receiving water. The current load to the treatment plant is estimated at 2,950p.e. The upgraded plant will therefore ensure that approximately 25% capacity is provided to allow for growth in Strandhill over its design life.

This figure includes for the busy tourist nature of the town and also a headroom allowance to ensure treated effluent quality is maintained at times of peak loading.

We trust you will find this information helpful, if you have any further queries please do not hesitate to contact us again.

Yours sincerely,

Louise Hegarty

Local Representative Support Desk

T:1890 178 178 | Minicom: 1890 378 378

E: localrepsupport@water.ie

W: www.water.ie

Please help our environment by not printing this email This message is intended only for the use of the person(s) ("the intended recipient(s)") to whom it is addressed. It may contain information which is privileged and confidential within the meaning of applicable law. If you are not the intended recipient, please contact the sender as soon as possible. The views expressed in this communication may not necessarily be the views held by Sligo County Council. Any attachments have been checked by a virus scanner and appear to be clean. Please ensure that you also scan all messages as Sligo County Council does not accept any liability for contamination or damage to your systems.

SÉANADH: Is d'úsáid an duine/na ndaoine chuig a bhfuil sí seolta agus sin amháin atá an teachtaireacht seo. D'fhéadfadh go bhfuil faisnéis faoi phribhléid nó faoi rún de réir bhrí an dlí is infheidhme inti. Mura tusa an seolaí a bhí beartaithe, bí ar an eolas go bhfuair tú an ríomhphost seo in earráide agus go bhfuil cosc iomlán ar an ríomhphost seo, nó aon chuid de, a úsáid, a scaipeadh, a chur ar aghaidh nó a chóipeáil. Má fuair tú an ríomhphost seo de bharr earráide, téigh i dteagmháil leis an seoltóir chomh luath agus is féidir, le do thoil. Ní gá gurb ionann dearcaí na ríomhphosta seo agus dearcaí Chomhairle Chondae Sligeach. Tá aon iatáin seiceáilte ag scanóir víris agus dealraíonn sé go bhfuil siad glan. Bí cinnte go ndéanfaidh tusa scanáil ar gach teachtaireacht chomh maith, le do thoil, mar ní ghlacann an Chomhairle dliteanas ar bith i leith éilliú ná dámáiste do do chuid córas.

Ann McKirdy <annmckirdy@gmail.com> Thu, Dec 8, 2016 at 8:35 AM
To: Sinead Maguire <sineadmaguire@yahoo.com>

Hi Sinead,

Sinead Maguire

Gmail

Ann McKirdy <annmckirdy@gmail.com>

Fwd: Upgrading of sewage plant at Strandhill, Co. Sligo (Notice of motion for Sligo County Council Meeting - 7th November, 2016)

P.E. 2950 capacity

2 messages

Sinead Maguire <sineadmaguire@yahoo.com> Tue, Dec 6, 2016 at 12:31 PM
To: Ann McKirdy <annmckirdy@gmail.com>

Hi Ann

I have attached below the reply eventually received from Irish water regarding my queries about the adequacy of the proposed upgrade of the treatment plant which I thought might interest you.

Thank you for forwarding the letter regarding funding for footpaths in Strandhill. I had hoped it would be more money and think that the council will probably be in a position to say they have spent that amount but I will follow it up.

Kind regards

Sinéad Maguire

WWTP 2016 upgrade notice of Motion

Sent from my iPhone

Begin forwarded message:

Sligo

From: Jo Anne McGonigle <jmcgonigle@sligococo.ie>
Date: 6 December 2016 at 12:25:02 GMT
To: Sligo County Council Members <members@sligococo.ie>
Subject: FW: Upgrading of sewage plant at Strandhill, Co. Sligo County Council Meeting - 7th November, 2016)

Dear Councillor,

Further to continued follow up by Mr. T. Kilfeather, Director of Services, please see reply received from Irish Water this morning.

Kind regards,

Jo-Anne

Irish Water

From: localrepsupport [mailto:localrepsupport@water.ie]
Sent: 06 December 2016 11:08
To: Jo Anne McGonigle
Cc: meetings
Subject: RE: Upgrading of sewage plant at Strandhill, Co. Sligo (Notice of motion for Sligo County Council Meeting - 7th November, 2016)

6/12/16

Dear Ms McGonigle,

Thank you for your email on behalf of the Members of Sligo County Council, regarding the upgrade of the sewage plant at Strandhill.

Please accept our apologies for the delay in resolving this query and for any inconvenience this may have caused.

2950 PE

Capacity at the Strandhill Wastewater Treatment Plant is being upgraded from 1,500p.e. to 3,700.

3/2016

The upgraded plant will also be designed to meet a higher level of treatment that will improve its current environmental impact on the receiving water. The current load to the treatment plant is estimated at 2,950p.e. The upgraded plant will therefore ensure that approximately 25% capacity is provided to allow for growth in Strandhill over its design life.

This figure includes for the busy tourist nature of the town and also a headroom allowance to ensure treated effluent quality is maintained at times of peak loading.

We trust you will find this information helpful, if you have any further queries please do not hesitate to contact us again.

Yours sincerely,

2950 PE
WWTP

Louise Hegarty

Local Representative Support Desk

T:1890 178 178 | Minicom: 1890 378 378

E: localrepsupport@water.ie

W: www.water.ie

Please help our environment by not printing this email This message is intended only for the use of the person(s) ("the intended recipient(s)") to whom it is addressed. It may contain information which is privileged and confidential within the meaning of applicable law. If you are not the intended recipient, please contact the sender as soon as possible. The views expressed in this communication may not necessarily be the views held by Sligo County Council. Any attachments have been checked by a virus scanner and appear to be clean. Please ensure that you also scan all messages as Sligo County Council does not accept any liability for contamination or damage to your systems.
_____ SÉANADH: Is d'úsáid an duine/na ndaoine chuig a bhfuil sí seolta agus sin amháin atá an teachtaireacht seo. D'fhéadfadh go bhfuil faisnéis faoi phribhléid nó faoi rún de réir bhrí an dlí is infheidhme inti. Mura tusa an seolaí a bhí beartaithe, bí ar an eolas go bhfuair tú an ríomhphost seo in earráide agus go bhfuil cosc iomlán ar an ríomhphost seo, nó aon chuid de, a úsáid, a scaipeadh, a chur ar aghaidh nó a chóipeáil. Má fuair tú an ríomhphost seo de bharr earráide, téigh i dteagmháil leis an seoltóir chomh luath agus is féidir, le do thoil. Ní gá gurb ionann dearcaí na ríomhphosta seo agus dearcaí Chomhairle Chondae Sligeach. Tá aon iatáin seiceáilte ag scanóir víris agus dealraíonn sé go bhfuil siad glan. Bí cinnte go ndéanfaidh tusa scanáil ar gach teachtaireacht chomh maith, le do thoil, mar ní ghlacann an Chomhairle dliteanas ar bith i leith éilliú ná dámáiste do do chuid córas.

Ann McKirdy <annmckirdy@gmail.com> Thu, Dec 8, 2016 at 8:35 AM
To: Sinead Maguire <sineadmaguire@yahoo.com>

Hi Sinead,

I'm sorry, I haven't had chance to reply, will try to sit down at w'end. Ann

[Quoted text hidden]

WWTP Contradiction EPA 2024

Contradicts Sinead Maguire 2016 numbers

or submission to the Director, David Flynn by the WEBS Programmer

Date: 9 September 2024

MEMO

Office of Environmental Sustainability

To: David Flynn, Director, OES	**Date:** 9 September 2024
From: Christine Murphy, Inspector, Water, Energy & Business Support Programme	
Subject: Examination and Review of Waste Water Discharge Licence	
Approved for Director by: Darragh Page, Programme Manager, WEBS Programme	

Recommendation: That the Agency approves the issue of an examination report and initiate a review for the Strandhill Waste Water Discharge Licence (WWDL) D0107-01.

Introduction

On foot of a third-party query and discussions with the Office of Environmental Enforcement (OEE), the Water Regulation and Dumping at Sea team became aware of an increase in the Strandhill waste water treatment plant capacity to 3,700 population equivalent (p.e.) from 2,600p.e. since the grant of the licence on 09/10/2013. The current collected load is reported in the 2023 AER at 2458 p.e. In accordance with Regulation 14(1) of the European Union (Waste Water Discharge) Regulations 2007 to 2020, I have examined and recommend a review by the Agency of the Strandhill WWDL D0107-01.

Examination report and proposed licence review:

Licence Examination

Strandhill WWDL has been examined and deemed necessary to review, having regard to the grounds for review (Regulation 14(6)(a)). There has been a material change in the design capacity of the Strandhill waste water treatment plant from 2,600 p.e. to 3,700 p.e. since the grant of the licence due to an upgraded waste water treatment plant in 2021.

The material change in the design capacity was not considered by the existing WWDL. Regulation 5(1A)(ii) requires the licensee to make a review WWDL application to the Agency where any change or extension of development already authorised would result in the waste water treatment works servicing an agglomeration with a population equivalent higher than the population equivalent authorised by the existing WWDL.

While it is noted that urban wastewater discharges are not identified as a significant pressure on the receiving waterbody, there has been a material change in the Water Framework Directive (WFD) status of Sligo Bay which has deteriorated from high to moderate since the grant of the licence. This deterioration in water quality of the receiving waterbody was not considered by the existing WWDL.

Regulation 14(1)(a) requires the Agency to examine a licence within 6 years of its authorisation and to review where certain grounds are met. Regulation 14(6) lists the grounds for which a review is required. Strandhill WWDL requires a review under Regulation 14(6)(a) as there has been a material change in the extent of the discharge to which the licence relates.

A review of the licence by the Agency will ensure compliance with the European Union (Waste Water Discharge) Regulations 2007 to 2020. It will also provide the opportunity for the public to participate in the decision-making process.

The Regulation 14(1) examination (recommendation to review and reasons for same) is set out in the attached examination report and summarised in Appendix 1. It is proposed to issue the examination report to the EPA website upon approval.

Review by the Agency

It is proposed to notify Uisce Éireann of the Agency's intention to conduct a review of the licence in accordance with Regulation 14(5) of the WWD Regulations. It is proposed that the notice will require Uisce Éireann to furnish, by a specified date, a completed WWDA application form using the Review Authorisation functionality on EDEN.

It is proposed to notify the water services authority in whose functional area the discharges occur of the Agency's intention to conduct a review of the licence in accordance with Regulation 14(5) of the WWD Regulations. The notice will state that submissions in relation to the review of a licence may be made to the Agency.

It is proposed that the Agency will publish a notice of its intention to review the licence on its website in accordance with Regulation 14(3) of the WWD regulations. The notice will state that submissions in relation to the review of a licence may be made to the Agency.

Recommendation

I recommend that the Agency issues the Regulation 14(1) examination report for the Strandhill WWDL listed in Appendix 1 and approves the initiation of the review for this licence in accordance with Regulation 14(5) of the European Union (Waste Water Discharge) Regulations 2007 to 2020.

Christine Murphy,
Inspector,
WEBS Programme

Appendix 1

WWDL Reg No.	Agglomeration Name	County	Reason for Categorising for Review
D0107-01	Strandhill	Sligo	1. There has been a material change in the extent of the discharge to which the licence relates due to an increase in treatment capacity since the grant of the licence; and 2. The licence was granted over 3 years ago.

County Council Minutes January 2017

Minutes 2017

Minutes of January Ordinary Meeting of Sligo County Council held on Monday, 9th January, 2017 at 11.00 a.m. in The Council Chamber, County Hall, Riverside, Sligo

COUNCILLORS PRESENT:

- Councillor Baker,
- Councillor Bree,
- Councillor Casserly,
- Councillor Gormley,
- Councillor Healy,
- Councillor Henry,
- Councillor Keaney,
- Councillor Lundy,
- Councillor Maguire,
- Councillor MacManus,
- Councillor MacSharry,
- Councillor Mulvey,
- Councillor O'Boyle,
- Councillor O'Grady,
- Councillor Taylor.

WWTP Sinead - Maguire Jan 2017 withdrew request to D. Clarke to explain increased load From Wild Atlantic Way

OFFICIALS IN ATTENDANCE:

- Mr. Ciarán Hayes, Chief Executive
- Mr. Tom Kilfeather, Director of Services
- Ms. Dorothy Clarke, Director of Services
- Ms. Marie Whelan, Head of Finance
- Mr. John Reilly, Head of Enterprise
- Mr. John Clancy, Head of I.S.
- Mr. Bartley Gavin, A/Director of Services
- Mr. Frank Moylan, Senior Planner
- Mr. Donal Tinney, County Librarian

- Ms. Margaret McConnell, S.E.O.
- Mr. Kevin Colreavy, Meetings Administrator
- Mr. Keith Lyons, Clerical Officer
- Ms. Jo-Anne McGonigle, Assistant Staff Officer

APOLOGIES:

Apologies were received from Councillor Clarke, Councillor Kilgannon and Councillor Queenan.

CATHAOIRLEACH:

Cathaoirleach, Councillor H. Keaney, presided.

The Cathaoirleach welcomed those present and wished them a Happy New Year.

SUSPENSION OF STANDING ORDERS – ADJOURNMENT AS A MARK OF RESPECT TO THE LATE LIAM KILGANNON:

At the suggestion of the Cathaoirleach, and with the unanimous agreement of the Members, the meeting was adjourned for a short period as a mark of respect to the late Liam Kilgannon. The Funeral of Mr. Kilgannon, an employee of Sligo County Council, was taking place at that time.

1. MINUTES OF SPC 3 (PLANNING, COMMUNITY AND ECONOMIC DEVELOPMENT, ARTS AND CULTURE) HELD ON 13TH SEPTEMBER 2016:

Proposed by Councillor S. Maguire
Seconded by Councillor H. Keaney

AND AGREED

"To confirm Minutes of SPC 3 Meeting (Planning, Community and Economic Development, Arts and Culture) held on 13th September, 2016".

2. MINUTES OF LOCAL TRAVELLER ACCOMMODATION CONSULTATIVE COMMITTEE – 7TH SEPTEMBER, 2016:

Proposed by Councillor S. Maguire
Seconded by Councillor G. O'Boyle

AND AGREED

"To confirm Minutes of Meeting of the Local Traveller Accommodation Consultative Committee (LTACC) held on 7th September, 2016."

"That Sligo County Council call on the Government (FG & The Independent Alliance) to appoint a Minister to deal exclusively with the ramifications of Brexit on Ireland".

An amendment to the motion on the Agenda was

Proposed by Councillor S. MacManus
Seconded by Councillor T. Healy

"That motion No. 15 on the agenda be amended to include the works 'supported by Fianna Fáil' be added after (FG & The Independent Alliance"

Following a discussion on this matter , the amendment was withdrawn and it was

Proposed by Councillor T. MacSharry
Seconded by Councillor R. O'Grady

AND AGREED

"That Sligo County Council call on the Government to appoint a Minister to deal exclusively with the ramifications of Brexit on Ireland".

16. STRANDHILL WASTE WATER TREATMENT PLANT

AND

MONITORING FIGURES FOR WILD ATLANTIC WAY:

Councillor S. Maguire indicated that she had received the information sought and, therefore, was withdrawing the deferred motion from the Agenda.

"Regarding the upgrading of the sewage plant at Strandhill, can Sligo County Council clarify from Irish Water whether the increased loading, resulting from the classification of Strandhill as a point of interest along the Wild Atlantic Way has been included in the capacity design calculations for the new waste water treatment plant. Can the up to date monitoring figures for those using the WAW also be provided to the Council."

17. SUPPORT FOR SLIGO BUSINESS IMPROVEMENT DISTRICT:

Proposed by Councillor S. MacManus
Seconded by Councillor T. Healy

AND AGREED

"To ask for a report on the resources, either human, financial or otherwise, given to date by Sligo Co Council in support of Sligo Business Improvement District (BIDS) and the projected annual support for this scheme."

The Head of Enterprise responded with a detailed report outlining the situation.

In noting that a sum of €395,000 had been anticipated as the income from the BID levies, Councillor MacManus requested and it was agreed that a short report would be prepared for the February Meeting outlining the income accrued from these levies.

18. APPLICATION UNDER WIFI4EU INITIATIVE:

Proposed by Councillor K. Henry
Seconded by Councillor J. Lundy

AND AGREED

"That Sligo County Council apply for the WIFI4EU initiative which promotes free Wi-Fi connectivity for citizens and visitors in public spaces such as parks, squares, public buildings, libraries, health centres, etc."

In confirming that the situation with this initiative is as had been outlined by Councillor Henry, the Head of Finance indicated that an application will be submitted when they are invited later in the year.

19. ENNISCRONE LIBRARY SERVICES:

With the agreement of the Members, this motion as submitted by Councillor J. Queenan was deferred to the February Ordinary Meeting Agenda

"Ask County Librarian to confirm that the Enniscrone library services will be maintained after August 17 when the present staff retire."

20. NORTHWEST REGIONAL DRUG AND ALCOHOL TASK FORCE PRESENTATION RE. ALCOHOL ABUSE:

With the agreement of the Members, this motion as submitted by Councillor M. Clarke was deferred to the February Ordinary Meeting Agenda

"Following a Presentation by Sean O'Connor - Northwest Regional Drug and Alcohol Task Force (NWRDATF) Co-ordinator, made to the Meeting of County Sligo Joint Policing Committee on 16th December 2016, in An Chroí South Sligo Enterprise Centre, Tubbercurry. I call on Sligo County Council to discuss the issue of alcohol abuse, lobby the Government, to have all alcohol addictive drug product removed from Shops and supermarkets, to train and provide qualifications for people to safely retail alcohol and to revitalise the traditional Irish Pub industry."

21. PEDESTRIAN CROSSING NEAR PLAYGROUND AT DOORLY PARK:

Proposed by Councillor M. Casserly
Seconded by Councillor R. O'Grady

MINUTES OF THE NOVEMBER ORDINARY MEETING OF SLIGO COUNTY COUNCIL HELD ON MONDAY, 7th NOVEMBER, 2016 AT 11.00 A.M. IN THE COUNCIL CHAMBER, COUNTY HALL, RIVERSIDE, SLIGO

Sinead Maguire

Upgrade WWTP November 2016.

Sligo Co. Co. Minutes Nov 2016

COUNCILLORS PRESENT:

- Councillor Baker,
- Councillor Bree,
- Councillor Clarke,
- Councillor Gormley,
- Councillor Henry,
- Councillor Kilgannon,
- Councillor Lundy,
- Councillor Maguire,
- Councillor MacManus,
- Councillor MacSharry,
- Councillor Mulvey,
- Councillor O'Boyle,
- Councillor O'Grady,
- Councillor Queenan,
- Councillor Taylor.

OFFICIALS IN ATTENDANCE:

- Mr. Ciarán Hayes, Chief Executive
- Mr. Tom Kilfeather, Director of Services
- Ms. Dorothy Clarke, Director of Services
- Mr. Bartley Gavin A/Director of Services
- Ms. Patricia Guckian, A/Head of Finance
- Mr. Donal Tinney, County Librarian
- Mr. Conall Calleary, Veterinary Inspector
- Mr. Tom Brennan, Senior Engineer
- Mr. Fineen O'Driscoll, A/Senior Engineer
- Mr. Seán Martin, A/Senior Architect
- Mr. Joe Murphy, Senior Executive Officer
- Mr. John O'Hara, Assistant Architect
- Ms. Pamela Andison, Administrative Officer
- Mr. Kevin Colreavy, Meetings Administrator
- Mr. Keith Lyons, Clerical Officer
- Ms. Jo-Anne McGonigle, Assistant Staff Officer

LEAS-CATHAOIRLEACH:

- Leas-Cathaoirleach, Councillor Tom MacSharry, presided.

APOLOGIES:

- Apologies were received from Councillor Casserly, Councillor Healy and Councillor Keaney.

"To request Sligo County Council to make an application for funding for an extension to the Pontoon at Mullaghmore and also for the Pontoon at Hughes Bridge in Sligo. The funding application to be applied for through The Northern and Western regional Assembly so that funding can be sourced through the Capital Investment Plan."

The Meeting was advised by Mr. Kilfeather as follows:

Additional Pontoon at Timber Jetty (near Hughes Bridge, Sligo Harbour)

Sligo County Council have previously applied for funding from the Department of Marine for design, planning and licensing for additional pontoons at this location (estimated cost c€29,000 for these items only).

Department funding in recent years has been restricted to physical works only and Sligo County Council has not been successful. Sligo County Council will investigate alternative funding options for these works subject to resources available to carry out design work.

Mullaghmore Harbour.

As Councillors are aware, there are significant issues with siltation at Mullaghmore Harbour. It has always been a tidal harbour and will always be so. This siltation has implications for the pontoons. In addition, Sligo County Council incurs significant expense maintaining the existing pontoon (this year it will amount to about c€17,000 - more than half the entire Pier and Harbours maintenance budget for the county).

The harbour at Mullaghmore, whilst appearing protected, is vulnerable to winter storms and substantial monies have been spent over the past twenty years repairing the Stephenson pier (in particular). The pontoon, ramp and piles have all been damaged.

Sligo County Council do not consider it prudent to add additional pontoons.

45. REQUEST FOR PEDESTRIAN EXIT FROM CAR PARK ON ADELAID STREET TO THE MID BLOCK ROUTE:

Proposed by Councillor S. Kilgannon
Seconded by Councillor T. MacSharry

AND AGREED

"To request Sligo County Council Roads department to construct a pedestrian Exit from the Car Park on Adelaide Street on to the Mid Block route . This pedestrian exit will open up the car park for use by the travelling public using the Train or Bus to travel out of Sligo."

The Members were advised by Mr. T. Kilfeather that given its proximity to the City Centre the Adelaide Street car park operates primarily as an overflow car park for Wine Street. It is primarily used for short term parking and the current parking rates applying therein reflect this trend. As such, Adelaide Street car park is unlikely to used by those wishing to avail of longer term parking. Nevertheless, it is considered that a pedestrian exit from the car park onto the Inner Relief Road could be of benefit to the public during off-peak times; for example serving as an overflow car park for patrons of The Showgrounds. Accordingly, it is proposed to refer the matter to the Planning Department for their consideration and observations also.

46. UPGRADING OF SEWAGE PLANT AT STRANDHILL & MONITORING FIGURES FOR THOSE USING THE WILD ATLANTIC WAY:

Proposed by Councillor S. Maguire
Seconded by Councillor D. Mulvey

AND AGREED

"Regarding the upgrading of the sewage plant at Strandhill, can Sligo County Council clarify from Irish Water whether the increased loading, resulting from the classification of Strandhill as a point of interest along the Wild Atlantic Way has been included in the capacity design calculations for the new waste water treatment plant. Can the up to date monitoring figures for those using the Wild Atlantic Way also be provided to the Council."

Mr. Kilfeather advised the Members that this query had been referred to Irish Water when it had been submitted. To date, no reply had been received. However, the Director of Services has continued to seek the reply to this and other motions. In relation to this matter, Mr. Kilfeather said significant negotiations had taken place regarding the new Plant in Strandhill. The capacity had been reduced to 2,400 but had been settled at 3,700 population equivalent capacity. If an upgrade is required to this Plant, it has been designed in such a way that an additional unit can be slotted in.

Councillor Maguire then requested the details regarding the measurement indicators under the Wild Atlantic Way which are used to inform Irish Water and other Bodies. This had been the root of the motion. If it is found that it has had a negative environmental impact and not mitigating against it and, if removed, it would have a significant impact on our economy.

Mr. Kilfeather confirmed that these details would be under Ms. Clarke's Directorate, and if it is something the Council are to do, it will have to be done.

It was agreed that the details requested would be provided by Ms. Clarke to the Members at their December Meeting.

It was then agreed to defer this motion to the Agenda of the Ordinary December Meeting.

47. PUBLIC LIGHTING ALONG R292 AT SCARDEN:

Proposed by Councillor S. Maguire
Seconded by Councillor S. MacManus

AND AGREED

"That Sligo County Council will review the public lighting along the R292 at Scarden adjacent to the Centre of Excellence."

The Director of Services, Mr. T. Kilfeather, advised the Members that given the large volume of turning movements arising at this location since the inception of the G.A.A. Centre of Excellence, it is considered that public lighting improvements are warranted here. This matter has been referred to the Council Public Lighting Designers for their consideration.

48. PROVISION OF A COLUMBARIUM IN SLIGO:

Proposed by Councillor S. Maguire
Seconded by Councillor D. Mulvey

AND AGREED

"Sligo County Council will provide a columbarium or an alternative for those wishing to have their loved ones cremated ashes interred in our cemeteries."

Mr. Kilfeather reported that *with the existing Sligo Cemetery fast reaching capacity, it is proposed that a new cemetery extension will be constructed on Council owned lands adjacent to the cemetery. Draft plans have been prepared for this c.1.3hectare site. In recognition of the changing attitudes to different types of burials and in ensuring the most efficient use of cemetery land for present and future generations, it is proposed that the new cemetery will accommodate a range of burial types. The new cemetery therefore will make provision for in excess of 1500 traditional grave spaces. It will also include facilities for cremated remains, most likely in the form of a columbarium wall.*

Part 8 Licence Application WWTP Approved Sept 2007

hoped the scheme would go to construction early next year and would be operational in approximately 12 months. Mr H. Kearns County Manager stated that there was a huge cost inherent in all these projects and that it was hoped that development levies would finance most of the capital costs. He also stated that there would be progressive increases in operational costs which could only result in increased charges.

After a discussion the following resolution was agreed;

Proposed by Councillor A. Higgins
Seconded by Councillor S. MacManus

AND AGREED

"That this Council calls for a meeting with the Minister fro Environment and Local Heritage to discuss the future financing and running costs of water treatment plants in this county".

11) PART 8 OF THE LOCAL GOVERNMENT (PLANNING AND DEVELOPMENT) REGULATIONS, 2001 (AS AMENDED), THE PROPOSED IMPROVEMENT WORKS TO THE SEWERAGE SCHEME AT CLOONTYPROCKLIS TOWNLAND, GRANGE, CO. SLGIO;

Proposed by Councillor P. Barry
Seconded by Councillor M. Gormley

AND AGREED

"To approve in accordance with Part 8 of the Local Government (Planning and Development) Regulations, 2001 (as amended), the proposed improvement works to the sewerage scheme at Cloontyprocklis Townland, Grange, Co. Sligo".

12) PART OF THE LOCAL GOVERNMENT (PLANNING AND DEVELOPMENT) REGULATIONS, 2001 (AS AMENDED), THE PROPOSED IMPROVEMENT WORKS TO THE ABOVE SEWERAGE WORKS AT KILLASPUGBRONE, STRANDHILL, CO. SLIGO;

Proposed by Councillor T. McLoughlin
Seconded by Councillor D. Bree

AND AGREED

"To approve in accordance with Part 8 of the Local Government (Planning and Development) Regulations, 2001 (as amended), the proposed improvement works to the above sewerage works at Killaspugbrone, Strandhill, Co. Sligo".

In reply to a query from Cllr D. Bree, Mr S. Concannon DOS stated that the scheme would cater for the area as it develops for the next 20 years. Mr K. Larkin S.E. informed the meeting that the problems being experienced in the Strandhill area were being caused by builders rubble blocking the mains.

exhibit B

Latest EPA Findings: Strandhill WWTP (Ref: D0107-01)

The most recent EPA site inspection (Ref: **SV27333**) and subsequent monitoring data confirm that the plant is failing to meet its legal limits for **Ammonia** due to overloading.

- **Significant Ammonia Breaches:**
  - The maximum allowable limit for Ammonia at Strandhill is **0.85 mg/l**.
  - In **June 2023**, Ammonia levels hit **4.51 mg/l**—more than **5 times** the legal limit.
  - Further breaches were recorded in **December 2024** and **January 2025**, with the EPA noting "poor quality effluent" and "elevated levels of both BOD and ammonia".
- **The Cause of Failure:**
  - Uisce Éireann representatives admitted to the EPA that these failures are directly linked to **"increased loading from the tourism sector"**.
  - This proves the plant is at its limit, confirming that any further development or "intensification" of the trail is environmentally reckless.
- **Water Quality Decline:**
  - Recent ambient monitoring results (August 2025) confirm **a deterioration in water quality** (BOD & Ortho-P concentrations) downstream of the effluent discharge point.

The EPA's own data (SV27333) confirms that Ammonia levels have reached over 5 times the legal limit (4.51 mg/l vs 0.85 mg/l). The Council's claim of 'future-proofing' is a scientific falsehood, as the EPA has explicitly attributed these failures to the 'increased loading from the tourism sector' that the Council continues to promote.

D0107-01).

Table: Documented Ammonia Breaches (Strandhill WWTP)

Date of Breach	Parameter	Recorded Level	Legal Limit (ELV)	Impact Severity
Dec 2024	Ammonia (as N)	**Exceeded**	0.85 mg/l	**Non-Compliant**
Jan 2025	Ammonia (as N)	**Elevated**	0.85 mg/l	**Poor Effluent Quality**
Jan 2025	BOD (cBOD)	**Elevated**	25 mg/l	**Organic Overload**
2023–2025	Ammonia (as N)	**Frequent**	0.85 mg/l	**Seasonal Variations**

Gmail

Ann McKirdy <ainenicamhlaidh@gmail.com>

Fwd: Repeated request for attention 3rd notification

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

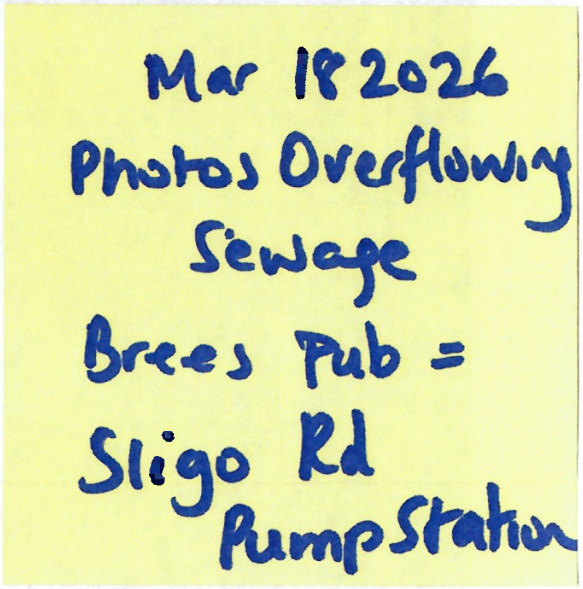
Wed, Mar 18, 2026 at 11:41 PM

Sent from my iPhone

Begin forwarded message:

From: Ann McKirdy <annmckirdy@me.com>
Date: 24 February 2022 at 14:28:47 GMT
To: Sligo Litter Warden <enviro@sligococo.ie>
Subject: Repeated request for attention 3rd notification

Photo of overflowing sewage at Brees Pub pump station Bridge Rd, Strandhill





Sent from my iPhone

29 Sept
Smell
WWTP

Gma

Ann McKirdy <ainenicamhlaidh@gmail.com>

Fwd: Flies at ...dhill making passage intolerable

3 messages

Ann McKirdy <annmckirdy@icloud.com>
To: Sligo Litter Warden <enviro@sligococo.ie>
Cc: qcsofficer@epa.ie, Ann McKirdy <ainenicamhlaidh@gmail.com>

Fri, Sep 29, 2023 at 6:01 PM

An addendum to my complaint, the smell of Sewage at the end of the runway is noxious and overwhelming.

There is no eircode to attach this to a formal complaint.

This waste water treatment plant on the SAC was upgraded without an environment impact assessment contrary to EU guidelines and EU Policy under the Habitats Directive.

Please investigate the safety of this waste water plant which is creating a hostile environment for humans to walk and surf in.

Sincerely,
Ann McKirdy
PS this area in question is part of the official Killaspugbrone Looped trail and this impacts all users , visitors and locals as well as the protected species in this SAC.

Sent from my iPhone

Begin forwarded message:

From: Ann McKirdy <annmckirdy@icloud.com>
Date: 29 September 2023 at 17:40:07 GMT+1
To: Sligo Litter Warden <enviro@sligococo.ie>
Subject: Flies at Sewage treatment plant Strandhill making passage intolerable

WWTP
swarming
flies

To whom it may concern,
I'm writing to alert you in late September to the problem of a thick swarm of black flies.
This is very very unusual at this time of year, in May the may fly is here but these flies are a huge ecological concern giving the location on the SAC by the waste water treatment plant.
Please alert the EPA and other relevant agencies and revert.
I look forward to your despondent.
Sincerely,
Ann McKirdy

Sent from my iPhone

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

Wed, Mar 18, 2026 at 11:36 PM

[Quoted text hidden]

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

Wed, Mar 18, 2026 at 11:39 PM

Sent from my iPhone

Begin forwarded message:

Gmail

Feb 2022

Ann McKirdy <ainenicamhlaidh@gmail.com>

Fwd: Water at bus stop Dorrins Strand - always not just on storm

1 message

Ann McKirdy <annmckirdy@icloud.com> Wed, Mar 18, 2026 at 11:38 PM
To: Ann McKirdy <ainenicamhlaidh@gmail.com>

Sent from my iPhone

Begin forwarded message:

From: Ann McKirdy <annmckirdy@me.com>
Date: 18 February 2022 at 12:37:09 GMT
To: Sligo Litter Warden <enviro@sligococo.ie>
Subject: Water at bus stop Dorrins Strand - always not just on storm

18/2/2022

Sent from my iPhone

IMG_9710.MOV
13075K

Photo of Storm Drain by Brees Pub & Bus Stop

Sept 2022

Gmail

Ann McKirdy <ainenicamhlaidh@gmail.com>

Fwd: Leitrim GAA Training on the sand dunes in Strandhill

Dunes

1 message

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

Wed, Mar 18, 2026 at 11:37 PM

Sent from my iPhone

Begin forwarded message:

From: Ann McKirdy <annmckirdy@icloud.com>
Date: 18 September 2022 at 16:20:44 GMT+1
To: Sligo Litter Warden <enviro@sligococo.ie>
Subject: Leitrim GAA Training on the sand dunes in Strandhill

GAA Training in Dunes

To who it may concern,
This is a serious problem, team training up the dunes. It's the Sligo Co Co responsibility to address this on behalf of the Strandhill Community.
These dunes are in the SAC.
This is an ongoing problem particularly since the dunes were featured on Irelands Fittest Family.
I was formally requesting that Sligo Co Co prohibit this immediately.
The airborne sand is a serious problem in Strandhill during windy weather as the marram grass is which stabilises the sand is damaged and killed by tramping.
This is urgent.
Please advise,
Sincerely,
Ann McKirdy

18/Sept 2022
GAA Training
Dunes



Sent from my iPhone

Gmail

Ann McKirdy <ainenicamhlaidh@gmail.com>

Fwd: Area of noxious smell from waste water Strandhill

1 message

29/9/23

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

Wed, Mar 18, 2026 at 11:36 PM

WWTP Smell

Photo attached

Sent from my iPhone

Begin forwarded message:

From: Ann McKirdy <annmckirdy@icloud.com>
Date: 29 September 2023 at 18:02:39 GMT+1
To: qcsofficer@epa.ie, Sligo Litter Warden <enviro@sligococo.ie>
Subject: **Area of noxious smell from waste water Strandhill**

23 Sept 23
WWTP Smell
with Photo



Sent from my iPhone

Gmail

Ann McKirdy <ainenicamhlaidh@gmail.com>

Fwd: Area of noxious smell from waste water Strandhill

1 message

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

Wed, Mar 18, 2026 at 11:35 PM

EPA
Oct 2023

Sent from my iPhone

Begin forwarded message:

From: Liam O'Suilleabhain <L.O'Suilleabhain@epa.ie>
Date: 23 October 2023 at 09:17:40 GMT+1
To: Ann McKirdy <annmckirdy@icloud.com>
Subject: RE: Area of noxious smell from waste water Strandhill

Area Identified
For EPA
Oct 2023
WWTP
Odour

Dear Ann

It appears that you may not have received my email sent on 17/10/2023 (see attached).

In any case my telephone number is 094 904 8446

Regards

Liam Ó Súilleabháin

Inspector

Urban Waste Water Team

Office of Environmental Enforcement, Castlebar

Cigire

Foireann Forfheidhmithe Fuiolluisce

An Oifig um Fhorfheidhmiú Comhshaoil, Caisleán an Bharragh

094-904-8446

l.osuilleabhain@epa.ie

www.epa.ie

www.epa.ie

<image003.png>

<image004.png>

<image005.png>

<image006.png>

From: Ann McKirdy <annmckirdy@icloud.com>
Sent: Friday 29 September 2023 18:03
To: QCS Officer <Q@epa.ie>; Sligo County Council (Environment Section) <enviro@sligococo.ie>
Subject: Area of noxious smell from waste water Strandhill

<image001.jpg>

Sent from my iPhone

---------- Forwarded message ----------
From: "Liam O'Suilleabhain" <L.O'Suilleabhain@epa.ie>
To: Ann McKirdy <annmckirdy@icloud.com>
Cc:
Bcc:
Date: Tue, 17 Oct 2023 07:52:32 +0000
Subject: RE: Area of noxious smell from waste water Strandhill

Dear Ann

My phone number is 094 904 8446. I've highlighted it in yellow below.

Regards

Liam Ó Súilleabháin

Inspector

Urban Waste Water Team

Office of Environmental Enforcement, Castlebar

Cigire

Foireann Fortheidhmithe Fuíolluisce

An Oifig um Fhorfheidhmiú Comhshaoil, Caisleán an Bharragh

094-904-8446

l.osuilleabhain@epa.ie

www.epa.ie

From: Ann McKirdy <annmckirdy@icloud.com>
Sent: Monday 16 October 2023 14:56
To: Liam O'Suilleabhain <L.O'Suilleabhain@epa.ie>
Subject: Re: Area of noxious smell from waste water Strandhill

Dear Liam,

Please let me know how to contact you, there is no phone number on your message.

Thank you,

Ann

Sent from my iPhone

On 13 Oct 2023, at 10:17, Liam O'Suilleabhain <L.O'Suilleabhain@epa.ie> wrote:

Dear Ann

Please contact me to discuss the below matter

Regards

Liam Ó Súilleabháin

Inspector

Urban Waste Water Team

Office of Environmental Enforcement, Castlebar

Ghaire

Foireann Fhorfheidhmithe Fuíolluisce

An Oifig um Fhorfheidhmiú Comhshaoil, Caisleán an Bhatraigh

094-904-8446

l.osuilleabhain@epa.ie

www.epa.ie

<image002.png>

<image003.png>

<image004.png>

<image005.png>

<image006.png>

From: Ann McKirdy <annmckirdy@icloud.com>
Sent: Friday 29 September 2023 18:03
To: QCS Officer <Q@epa.ie>; Sligo County Council (Environment Section) <enviro@sligococo.ie>
Subject: Area of noxious smell from waste water Strandhill

<image001.jpg>

Sent from my iPhone

6 attachments

image001.png
9K

image002.png
1K

image003.png
1K

image004.png
1K

image005.png
2K

mime-attachment.eml
57K

Gmail

Ann McKirdy <ainenicamhlaidh@gmail.com>

Fwd: Area of noxious smell from waste water Strandhill

1 message

Ann McKirdy <annmckirdy@icloud.com> Wed, Mar 18, 20:
To: Ann McKirdy <ainenicamhlaidh@gmail.com>

Sent from my iPhone

Begin forwarded message:

From: Ann McKirdy <annmckirdy@icloud.com>
Date: 20 November 2023 at 16:36:17 GMT
To: Liam O'Suilleabhain <L.O'Suilleabhain@epa.ie>
Subject: Re: Area of noxious smell from waste water Strandhill

Dear Liam,
I phoned today and left a voice message. I have huge concerns regarding the SAC, with regards to the National Looped trail which was put on the fragile dunes systems (immedi after receiving €300,000 in 2013 from the EPA for Dune management in spite of the fact their reports highlight the anthropogenic impact on these systems) and the saltwater marshes. Moreover no Part 8 or environmental impact assessment (I have confirmed written proof from Irish Water) was not done for the increase to capacity and the massive development of the water water treatment plant which is on the SAC.

There are strict EU Regulatuons, these take precise ce over development objectives.

Strandhill is home to extensive Neolithic monuments and presently is being reviewed for UNESCO world heritage status for the cairn systems in this area.

I look forward to hearing from you.

Many thanks,
Sincerely,
Ann McKirdy
Sent from my iPhone

On 12 Nov 2023, at 17:02, Ann McKirdy <annmckirdy@icloud.com> wrote:

Dear Liam,
I'm sorry for my delay due to unforeseen circumstances . I will get in touch with you shortly.

I'm very very concerned about the waste water treatment plant in Strandhill. My kids are surfers and we live locally.
I recently requested the License details for the discarding of waste materials and it would appear that Strandhill has not received a new license to correspond with increased output. The Sligo Co council has not carried out an environmental impact assessment on this plant in spite of the fact it is on an SAC. activity .

I will send photos of the Waste Trucks Collection from Septic Tanks.

On reading the EPA REPORT, there is 'No sludge and other input for the treatment plant .'
Yet, this truck dumps at least once daily as I see it on my walk.

That is a massive increase in sewage load
Sent from my iPhone

This site new treatment plant has failed to meet EPA's standards since it's opening.

Please advise,
Many thanks,
Ann

On 23 Oct 2023, at 09:17, Liam O'Suilleabhain <L.O'Suilleabhain@epa.ie> wrote:

Dear Ann

It appears that you may not have received my email sent on 17/10/2023 (see attached).

In any case my telephone number is 094 904 8446

Regards

Liam Ó Súilleabháin

Inspector

Urban Waste Water Team

Office of Environmental Enforcement, Castlebar

Cigire

Foireann Forfheidhmithe Fuiolluisce

An Oifig um Fhorfheidhmiú Comhshaoil, Caisleán an Bharragh

<image001.png>

094-904-8446

l.osuilleabhain@epa.ie

www.epa.ie

<image002.png>
<image003.png>
<image004.png>
<image005.png>

From: Ann McKirdy <annmckirdy@icloud.com>
Sent: Saturday 21 October 2023 01:04
To: Liam O'Suilleabhain <L.O'Suilleabhain@epa.ie>
Subject: Re: Area of noxious smell from waste water Strandhill

Please email your contact information.

Thank you,

Ann

Sent from my iPhone

On 16 Oct 2023, at 14:56, Ann McKirdy <annmckirdy@icloud.com> wrote:

Dear Liam,

Please let me know how to contact you, there is no phone number on your message.

Thank you,

Ann

Sent from my iPhone

On 13 Oct 2023, at 10:17, Liam O'Suilleabhain <L.O'Suilleabhain@epa.ie> wrote:

Dear Ann

Please contact me to discuss the below matter

Regards

Liam Ó Súilleabháin

Inspector

Urban Waste Water Team

Office of Environmental Enforcement, Castlebar

Cigire

Foireann Forfheidhmithe Fuíolluisce

An Oifig um Fhorfheidhmiú Comhshaoil, Caisleán an Bharraigh

<image002.png>

094-904-8446

l.osuilleabhain@epa.ie

www.epa.ie

<image003.png>
<image004.png>
<image005.png>
<image006.png>

From: Ann McKirdy <annmckirdy@icloud.com>
Sent: Friday 29 September 2023 18:03
To: QCS Officer <Q@epa.ie>; Sligo County Council (Environment Section) <enviro@sligococo.ie>
Subject: Area of noxious smell from waste water Strandhill

<image001.jpg>

Sent from my iPhone
<mime-attachment>

Gmail

Ann McKirdy <ainenicamhlaidh@gmail.com>

Fwd: Noxious smell report again Strandhill runway by sea

WWTP Smell

1 message

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

Wed, Mar 18, 2026 at 11:33 PM

Sent from my iPhone

Begin forwarded message:

2/June/24

From: Ann McKirdy <annmckirdy@icloud.com>
Date: 2 June 2024 at 18:41:48 GMT+1
To: Sligo Litter Warden <enviro@sligococo.ie>
Subject: Noxious smell report again Strandhill runway by sea

Noxious Odour
2/6/24



Sent from my iPhone

Gmail

Ann McKirdy <ainenicamhlaidh@gmail.com>

Fwd: Raw sewage FORMAL COMPLAINT - Bank Holiday weekend - Strandhill

1 message

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

Raw Sewage
4/June/24

Sent from my iPhone

Begin forwarded message:

From: Clinton Morrow <clmorrow@water.ie>
Date: 4 June 2024 at 10:46:55 GMT+1
To: Ann McKirdy <annmckirdy@icloud.com>
Cc: enviro <enviro@sligococo.ie>, dorothyclarke@sligococo.ie, James Melvin <jmelvin@water.ie>, Kevin Love <klove@water.ie>, Dessie Daly <ddaly@water.ie>
Subject: RE: Raw sewage FORMAL COMPLAINT - Bank Holiday weekend - Strandhill

Ann

Thank you for highlighting the below issue, we were aware of the issue on Saturday afternoon and we engaged our contractor to resolve the problem in the sewer network.

The cause of the problem was a build up of FOG (Fats Oils & Grease) in the foul network, substances which should not enter the sewer network.

FOG usually comes from kitchens of Food Service Establishments (FSEs) where food is prepared, cooked or served. Blockages from FOG can result in raw sewage overflowin causing an environmental and public health hazard.

In future if you can all customer issues are to be directed to UE Call Centre 1800278278, this way they can be identified and resolved faster

Regards

Clinton Morrow
Operations Technical Lead

Wastewater Technical Operations

Uisce Éireann
The Old Gaol,

St Annes Place,

Riverside,

Sligo.

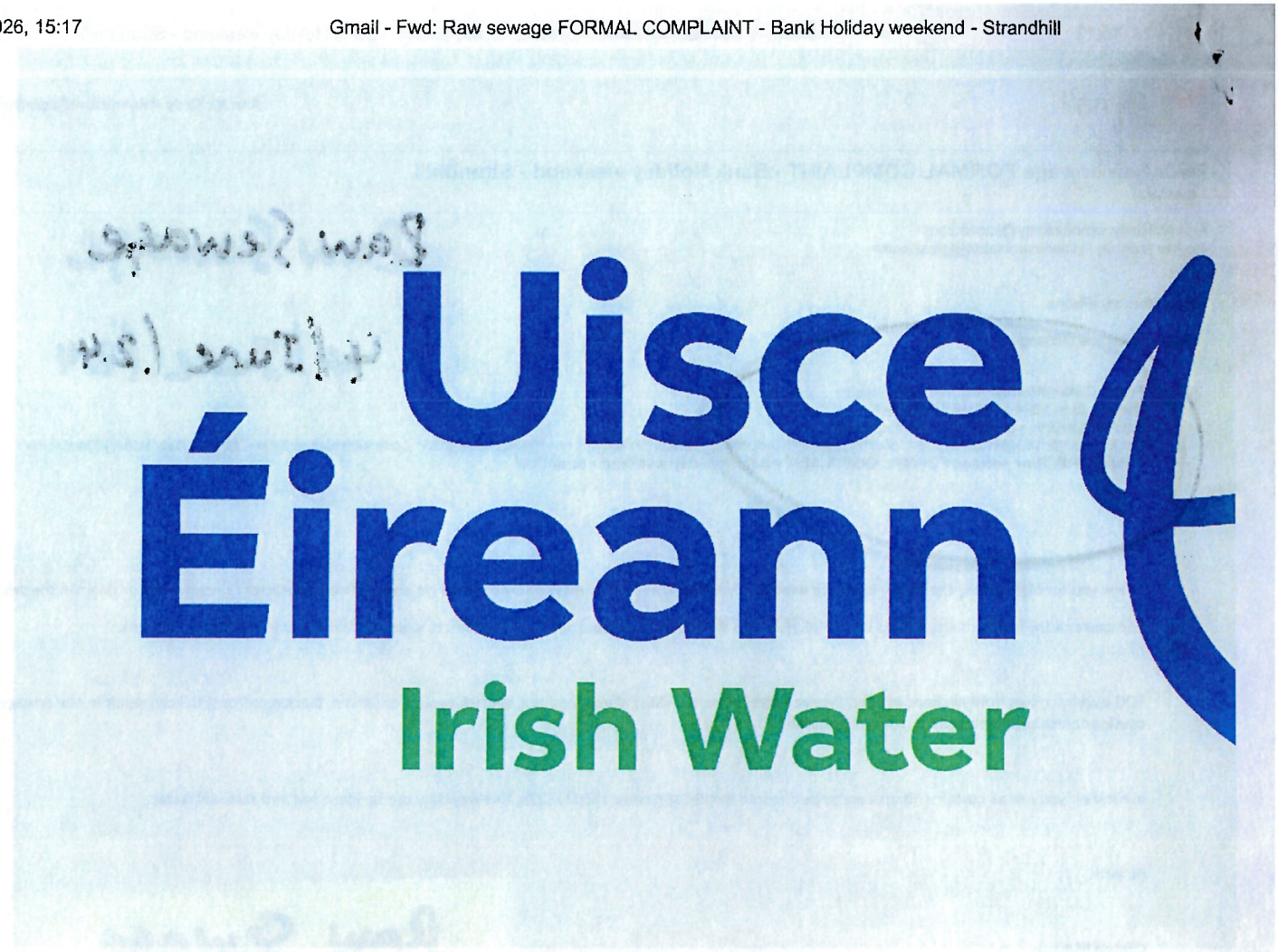
F91 VW35

M +353 87 6540941
clmorrow@water.ie

www.water.ie

Facebook | Twitter | LinkedIn

Raw Sewage
4/June/24



From: Pauline Langan <plangan@sligococo.ie>
Sent: Tuesday, June 4, 2024 9:26 AM
To: waterservices <waterservices@sligococo.ie>; James Melvin <jmelvin@water.ie>; Clinton Morrow <clmorrow@water.ie>; Dessie Daly <ddaly@water.ie>; John Mor
Subject: FW: Raw sewage FORMAL COMPLAINT - Bank Holiday weekend - Strandhill

CAUTION: The email originated from outside of your organisation. Do not click links or open attachments unless you recognise the sender and are sure that the content is safe. If you sus
Service Desk.

FYI

Pauline Langan

Water Services, Sligo County Council, St. Anne's Place, Sligo F91 VW35

+353-71-9111374
plangan@sligococo.ie
sligococo.ie | sligo.ie

SLIGO COUNTY COUNCIL

Sligo.

From: enviro <enviro@sligococo.ie>
Sent: Tuesday, June 4, 2024 9:23 AM
To: Enda Killoran <ekilloran@sligococo.ie>; Water Admin <wateradmin@sligococo.ie>
Subject: FW: Raw sewage FORMAL COMPLAINT - Bank Holiday weekend - Strandhill

From: Ann McKirdy <annmckirdy@icloud.com>
Sent: Saturday, June 1, 2024 5:19 PM
To: enviro <enviro@sligococo.ie>; dorothyclarke@sligococo.ie
Subject: Raw sewage FORMAL COMPLAINT - Bank Holiday weekend - Strandhill

Dear Dorothy Clarke and Environment Officer

I am making a formal complaint about raw sewage flowing into the street in the village of Strandhill.
I am reporting this again following numerous videos sent from outside/near Brees Pub by the old bridge.

The spilling of raw sewage onto the road in Strandhill Village is indicative of a major problem with the waste waster treatment system. Saturday 1st June is a

This June Bank Holiday Weekend vulnerable children and visitors are at risk of serious illness.

Please respond formally.
Sincerely,
Ann McKirdy

Raw Sewage
June 1st 2024



Sent from my iPhone

Is don duine amháin nó don eintiteas amháin ainmnithe ar an seoladh an fhaisnéis agus d'fhéadfadh ábhar faoi rún, faoi phribhléid nó ábhar atá íogair ó thaobh na tráchtála de a eititis; nach dóibh siúd an fhaisnéis- aon athbhreithniú a dhéanamh, aon atarchur a dhéanamh nó aon athdháileadh a dhéanamh, nó aon úsáid eile a bhaint as an bhfaisnéis, nó d'fhéadfaí an dlí a shárú dá ndéanfaí sin. Séanann Uisce Éireann dliteanas as aon ghníomh agus as aon iarmhairt bunaithe ar úsáid neamhúdaraithe na faisnéise seo. Séanann faisnéise sa chumarsáid seo agus séanann Uisce Éireann dliteanas maidir le haon mhoill a bhaineann leis an bhfaisnéis a fháil. Má tá an ríomh-phost seo faighte agat trí dhearm ábhar ó gach aon ríomhaire. D'fhéadfadh ríomhphost a bheith so-ghabhálach i leith truaillithe, idircheaptha agus i leith leasuithe neamhúdaraithe. Séanann Uisce Éireann aon fhr seo nó as aon dochar do chórais na bhfaighteoirí déanta ag an teachtaireacht seo nó ag a ceangaltáin tar éis a sheolta. Tabhair faoi deara go bhféadfadh monatóireacht a bheith Éireann d'fhonn ár ngnó a chosaint agus chun a chinntiú go bhfuiltear ag teacht le beartais agus le caighdeáin Uisce Éireann. Is cuideachta gníomhaíochta ainmnithe é Uisce Éir n-Achtanna um Sheirbhísí Uisce 2007-2022, a bhfuil a bpríomh-ionad gnó ag Teach Colvill, 24-26 Sráid na Talbóide, BÁC 1.

Go raibh maith agat as d'aird a thabhairt.

The information transmitted is intended only for the person or entity to which it is addressed and may contain confidential, commercially sensitive and/or privileged material. Any r action in reliance upon, this information by persons or entities other than the intended recipient is prohibited and may be unlawful. Uisce Éireann accepts no liability for actions or Éireann is neither liable for the proper and complete transmission of the information contained in this communication nor for any delay in its receipt. If you received this in error, pl Mail may be susceptible to data corruption, interception and unauthorised amendment. Uisce Éireann accepts no responsibility for changes to or interception of this e-mail after it by this message or its attachments. Please also note that messages to or from Uisce Éireann may be monitored to ensure compliance with Uisce Eireann's policies and standard company limited by shares, established pursuant to the Water Services Acts 2007-2022, having its principal place of business at Colvill House, 24-26 Talbot Street, Dublin 1.

Thank you for your attention.

Gmail

Smell

Ann McKirdy <ainenicamhlaidh@gmail.com>

Reporting constant noxious smell of sewage at end of runway Strandhill /sea side

2 messages

Ann McKirdy <annmckirdy@icloud.com>
To: Sligo Litter Warden <enviro@sligococo.ie>

WWTP

Fri, Jun 14, 2024 at 8:56 PM

14 June 2024

Sent from my iPhone

2 attachments



IMG_5020.jpg
599K



IMG_5019.jpg
1000K

June 14 2024
Noxious Odour

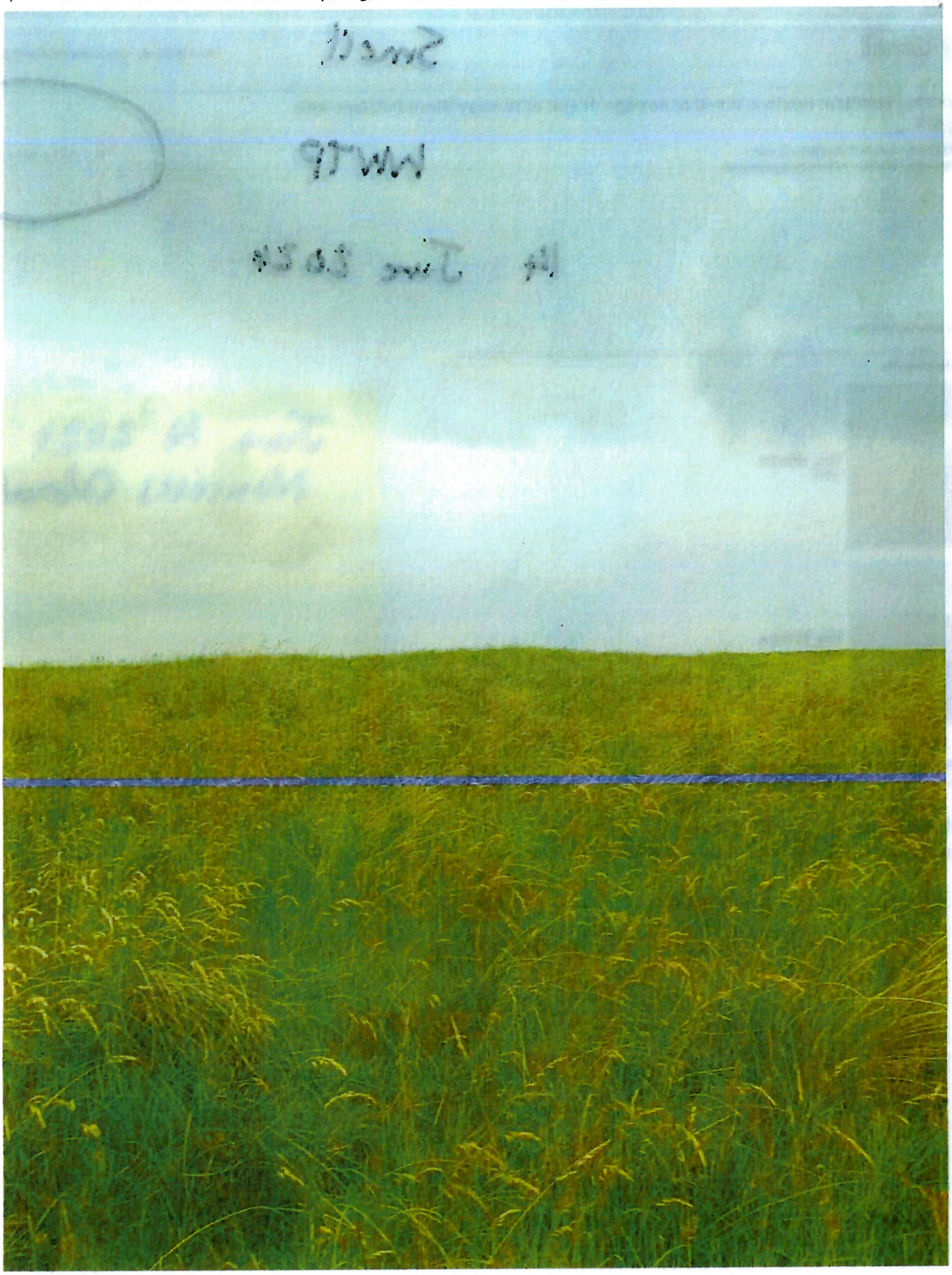
Ann McKirdy <annmckirdy@icloud.com>
To: Ann McKirdy <ainenicamhlaidh@gmail.com>

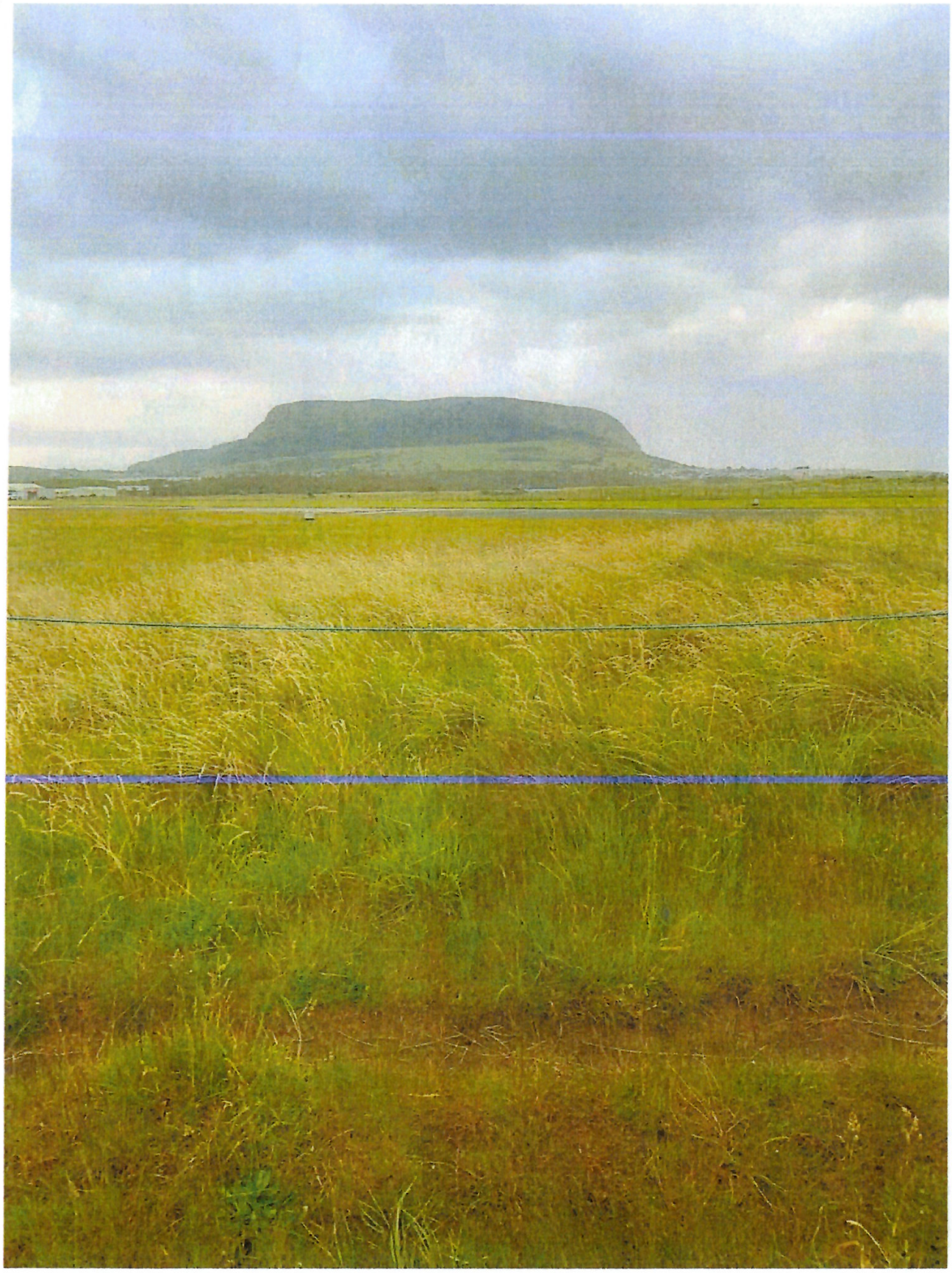
PM

Sent from my iPhone

Begin forwarded message:

From: Ann McKirdy <annmckirdy@icloud.com>
Date: 14 June 2024 at 20:56:43 GMT+1
To: Sligo Litter Warden <enviro@sligococo.ie>
Subject: **Reporting constant noxious smell of sewage at end of runway Strandhill /sea side**





Sent from my iPhone

Gmail

Ann McKirdy <ainenicamhlaidh@gmail.com>

Fierce smell of sewage at end of runway and between church and runway. Is there a drain in that area? It is putrid. Please investigate

2 messages

Ann McKirdy <annmckirdy@icloud.com>
To: Sligo Litter Warden <enviro@sligococo.ie>

Sun, Jun 16, 2024 at 9:27 PM

June 16th 2024

Sent from my iPhone

3 attachments



IMG_5097.jpg
378K



IMG_5096.jpg
674K



IMG_5095.jpg
1000K

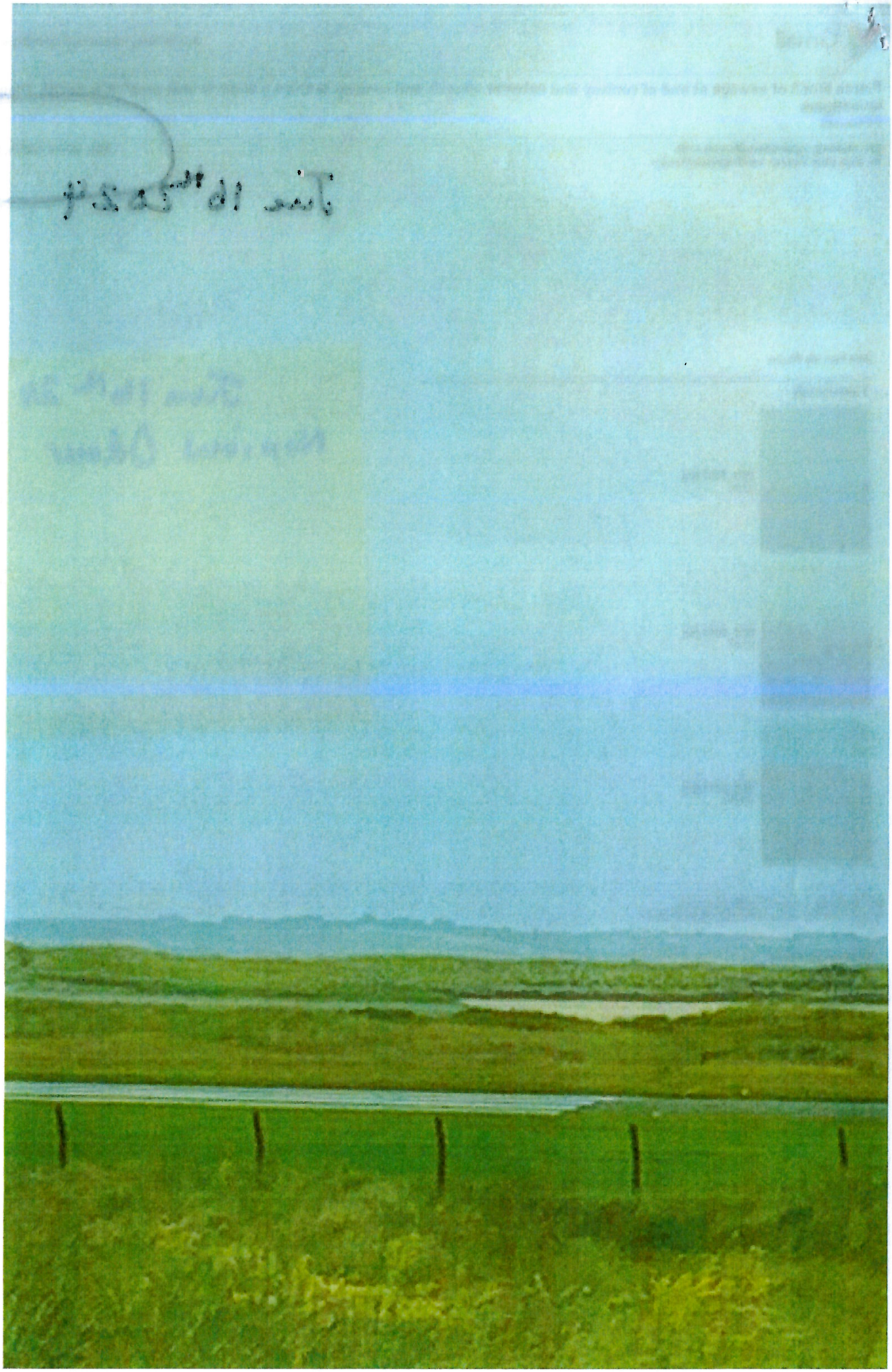
June 16th 24
Noxious Odour

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

Sent from my iPhone

Begin forwarded message:

From: Ann McKirdy <annmckirdy@icloud.com>
Date: 16 June 2024 at 21:27:32 GMT+1
To: Sligo Litter Warden <enviro@sligococo.ie>
Subject: Fierce smell of sewage at end of runway and between church and runway. Is there a drain in that area? It is putrid. Please investigate









Sent from my iPhone

Gmail

Ann McKirdy <ainenicamhlaidh@gmail.com>

Second location of noxious sewage smell at end of runway extending to turnstile gate - please investigate and advise

2 messages

Ann McKirdy <annmckirdy@icloud.com>
To: Sligo Litter Warden <enviro@sligococo.ie>

Mon, Jun 17, 2024 at 7:24 PM

June 17th 2024

Sent from my iPhone



IMG_5124.jpg
784K

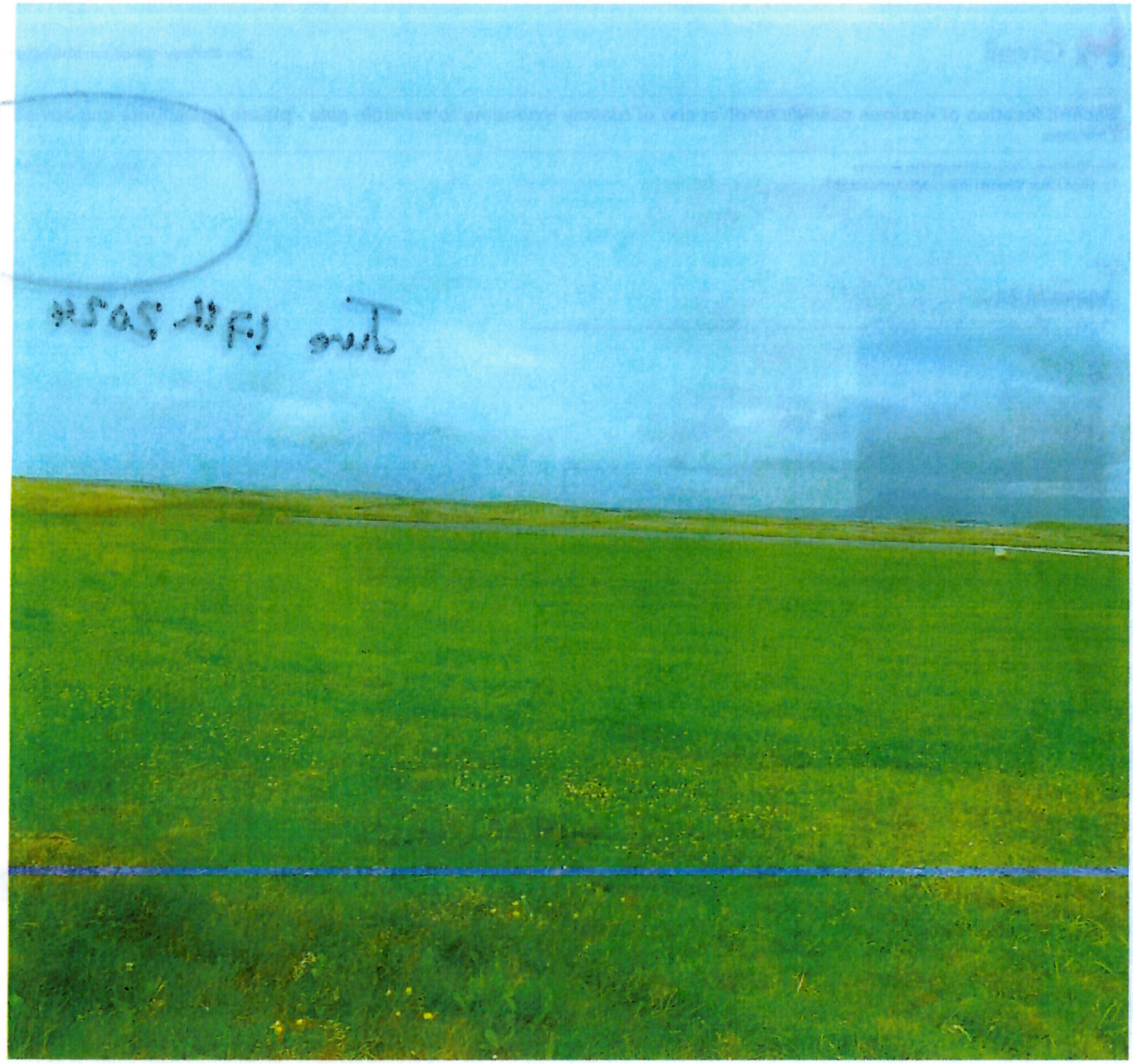
Ann McKirdy <annmckirdy@icloud.com>
To: Ann McKirdy <ainenicamhlaidh@gmail.com>

Sent from my iPhone

Begin forwarded message:

From: Ann McKirdy <annmckirdy@icloud.com>
Date: 17 June 2024 at 19:24:55 GMT+1
To: Sligo Litter Warden <enviro@sligococo.ie>
Subject: Second location of noxious sewage smell at end of runway extending to turnstile gate - please investigate and advise

June 17 '24



Sent from my iPhone

Gmail

WWTP Smell

Ann McKirdy <ainenicamhlaidh@gmail.com>

Noxious sewage smell Strandhill please investigate

2 messages

Ann McKirdy <annmckirdy@icloud.com>
To: Sligo Litter Warden <enviro@sligococo.ie>

Thu, Jun 20, 2024 at 7:15 PM

Sent from my iPhone

June 20th 2024



IMG_5216.jpg
1009K

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

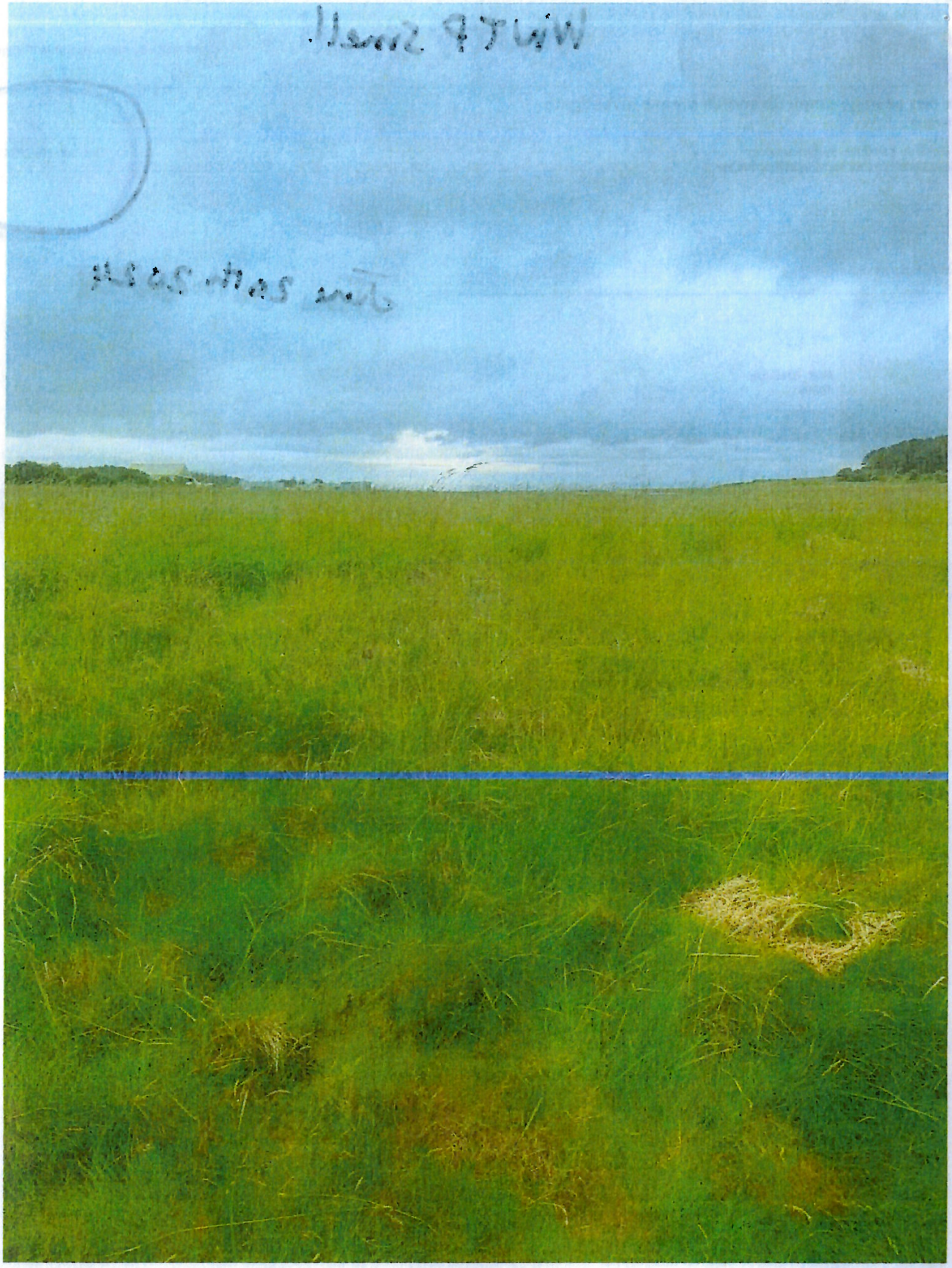
Wed, Mar 18, 2026 at 11:31 PM

Sent from my iPhone

Begin forwarded message:

From: Ann McKirdy <annmckirdy@icloud.com>
Date: 20 June 2024 at 19:15:36 GMT+1
To: Sligo Litter Warden <enviro@sligococo.ie>
Subject: Noxious sewage smell Strandhill please investigate

WWTP
Noxious Odour
20/June/24



Sent from my iPhone

Gmail

WWTP Smell

Ann McKirdy <ainenicamhlaidh@gmail.com>

Photo from compass waste sewage noxious smell

June 22nd 2024

2 messages

Ann McKirdy <annmckirdy@icloud.com>
To: Sligo Litter Warden <enviro@sligococo.ie>

Sat, Jun 22, 2024 at 12:27 PM

To whom it may concern,
The shocking fact that the sewage smell continues to pollute the air in Strandhill is not being acknowledged or investigated by Sligo Co Co.
I expect the rezoning for residential development and the reclassification of Strandhill as Satellite Town for development it would be hoover the Sligo Co Co to ignore the fact that the new WWTP is at capacity and the sewage treatment network systems are not working efficiently.
This is part of my formal complaint.
Please investigate fully and advise.
Yours faithfully,
Ann McKirdy

Sent from my iPhone

3 attachments



IMG_5253.jpg
1136K



IMG_5254.jpg
1011K



IMG_5255.PNG
163K

Noxious Odour
June 22nd
Report with
Photos

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

Wed, Mar 18, 2026 at 11:31 PM

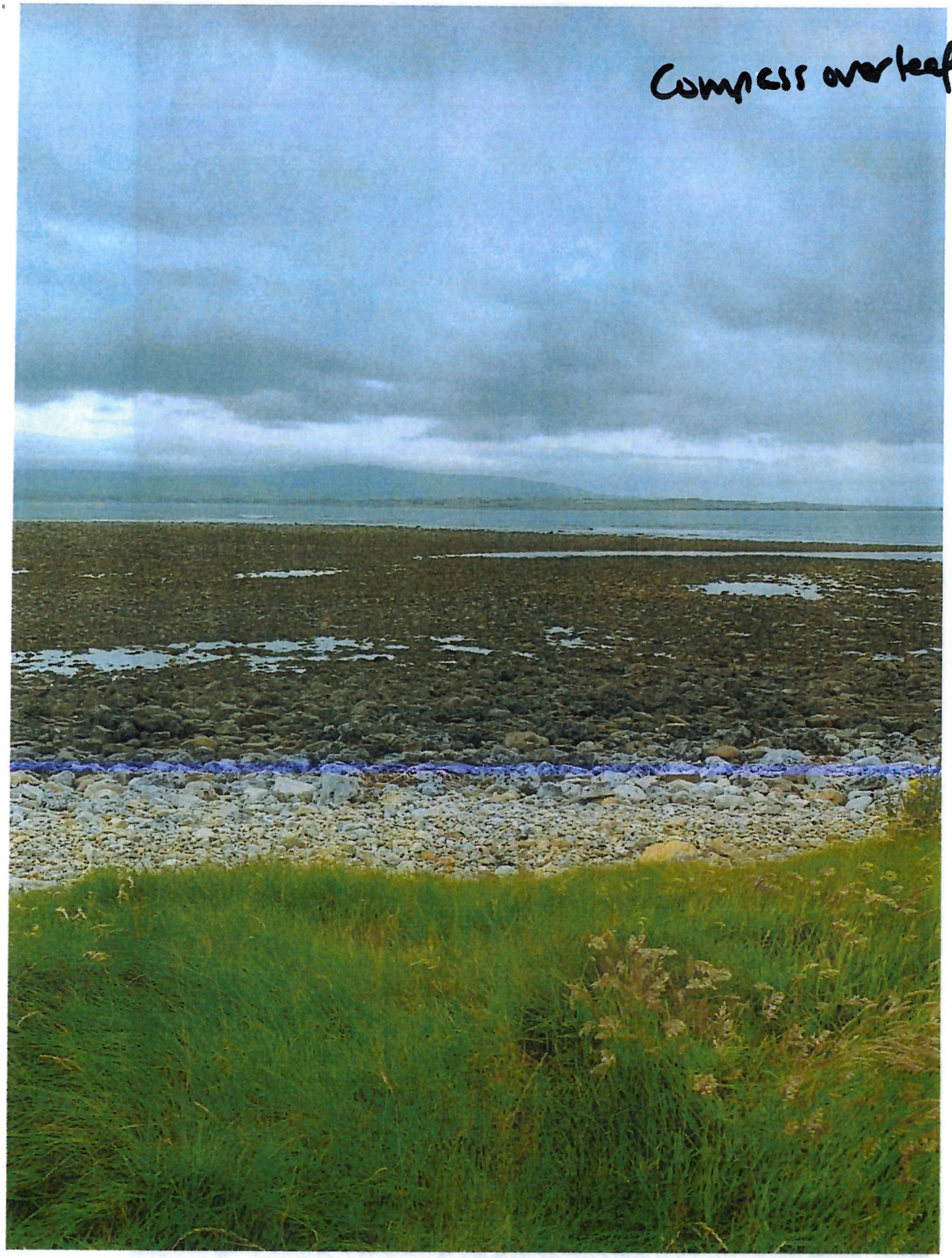
Sent from my iPhone

Begin forwarded message:

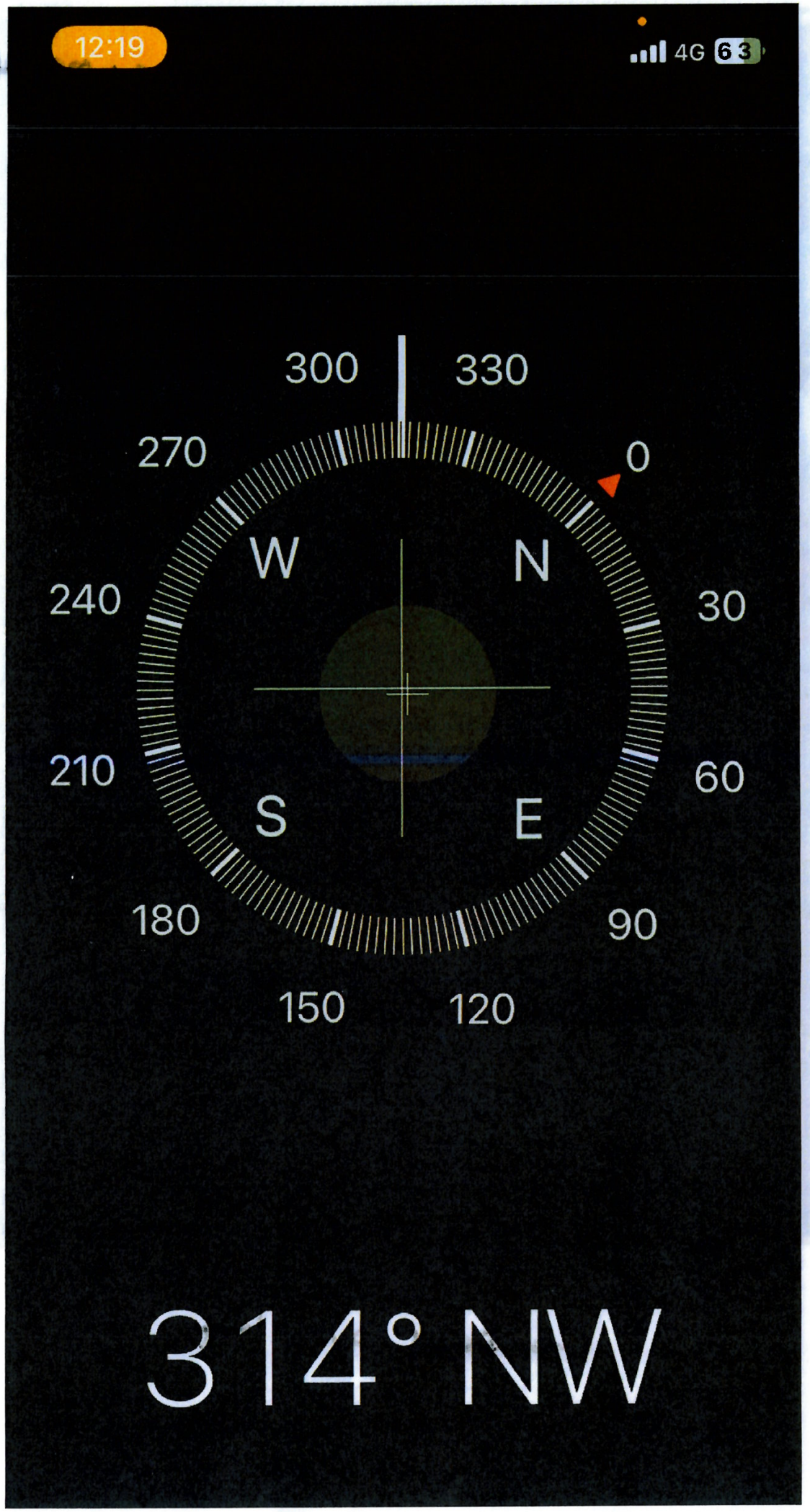
From: Ann McKirdy <annmckirdy@icloud.com>
Date: 22 June 2024 at 12:27:13 GMT+1
To: Sligo Litter Warden <enviro@sligococo.ie>
Subject: Photo from compass waste sewage noxious smell

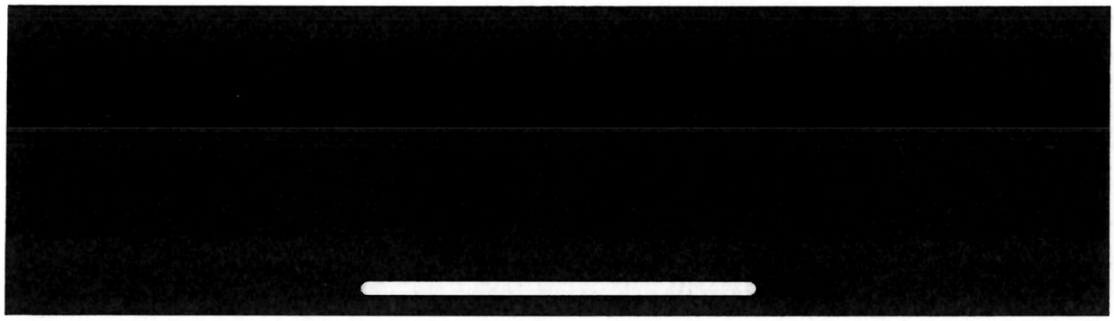
To whom it may concern,
[Quoted text hidden]


Nearest WWTW
noxious smell



Compass overleaf →


12:19
4G
300
330
270
0
W
N
240
30
210
60
S
E
180
90
150
120
314° NW



Sent from my iPhone

WWTP Smell

Gmail

Ann McKirdy <ainenicamhlaidh@gmail.com>

30/12/2019

Putrid smell from sewer treatment plant in Killaspugbrone

3 messages

Ann McKirdy <ainenicamhlaidh@gmail.com> Mon, Dec 30, 2019 at 5:14 PM
To: enviro@sligococo.ie

To whom it may concern,
I am writing to report an intoxicatingly putrid smell from the sewage treatment plant presently in Killaspugbrone.
It is A Special Area if conservation. This level of toxic odour is unacceptable particularly after the major works undertaken to upgrade the facility.
Please advise what measures are being put in place to combat this.
Yours faithfully,
Ann McKirdy

enviro <enviro@sligococo.ie> Tue, Dec 31, 2019 at 2:43 PM
Reply-To: enviro <enviro@sligococo.ie>
To: Ann McKirdy <ainenicamhlaidh@gmail.com>

Dear Ms McKirdy

Thank you for your email. I have spoken to Water Services regarding your enquiry and received the following response. I hope that this is of help.

If you have further queries, please contact Mr John Morris at jmorris@sligococo.ie

"SCC can advise that the old overloaded treatment plant at Strandhill is still in operation, that upgrade works at the facility are approaching completion with the new plant programmed to come on stream in Q1 of 2020."

Kind Regards

30 Dec 2019
Noxious Odour
NWTP

Karen Elliott

Environment Section

Sligo County Council | County Hall | Riverside | Sligo.

Direct Tel: +353 71 911 1454 | Email: Kelliott@sligococo.ie | Web: www.slig

[Quoted text hidden]

Ann McKirdy <ainenicamhlaidh@gmail.com> Wed, Mar 18, 2026 at 11:24 PM
To: Ann McKirdy <ainenicamhlaidh@gmail.com>

[Quoted text hidden]

Gmail

EPA

Ann McKirdy <annmckirdy@gmail.com>

Lee Kelly

1 message

Ann McKirdy <annmckirdy@gmail.com> Mon, Dec 11, 2023 at 10:42 PM
To: sea@epa.ie

WWT P

Dear Mr. Kelly,
I am writing with regards to the upcoming Draft Amendment to the County Sligo Development Plan. I note the EPA has made a submission.

I am requesting herewith for the EPA to make an additional submission regarding the Waste Water Treatment Plant in Strandhill which is located on an SAC and is connected via pipe work to dump into the sea in front of the WWTP which is also an SAC.

The concerns I have are several:
Firstly, No Appropriate Assessment was carried out for this extensive development despite the obvious hazards to human health and the fact that it is located in an area protected under the EU Habitatat Directives with Annex 1 Protected Species.

Furthermore it is build on the Protected Marram Dunes Systems which have a population of Whorl Snail which is endangered

Surfers

It dumps into the area known to local surfers as 'Blackrock', less than 50 metres from the WWTP. This along with the water at the sea front is one of the most popular destinations in Ireland for surfers and has seen the development of the National Surfing Centre a Four Million Euros, Failte Ireland investment.

Shellfish

This WWTP is less than 1 km from Coney Island Shell Fish Farm which provides hundreds of tonnes of Oysters to the Irish and French Markets.

This Waste Water Treatment Plant is adjacent to the historic Killaspugbrone Church where St. Patrick reputedly lost a tooth and the gold shrine from this site is held in the National Museum of Ireland.

Dunes

This WWTP is located on shifting Dunes which are extremely vulnerable due to the high volume of foot traffic generated from the National Looped Trail - which was also developed without an Appropriate Assessment on the SAC, including the development of a semi hard surface and drainage of the Salt Water Marshes SAC at Killaspugbrone, Dorrins Strand. Hundreds of thousands of walkers descend on these walks. I will attach a copy of the FOI I requested from Sligo Co. Co. with details/headcount of visitors to each walk.

These walkers use the facilities in Strandhill and add to the load on the WWTP.

Market

Furthermore, the Sunday Indoor Market at the Airport - which was not approved for a change of function under Planning Law - sees thousands of visitors every week. Again, these people use the facilities adding to the load on the WWTP.

This area is home to dune nesting birds, the impact of anthropologic and canine tramping on this land has been detrimental. Not only is dog faeces a huge contaminant, the dogs destroy the nests and chase the sky lark.

The EU Habitat Directives are in place to ensure that these unique habitats are protected under legislation.

Presently, the Sligo Co. Co. Draft amendment proposes to increase housing and house density significantly.

I trust you will make a submission given that this 'Competent Authority' has flagrantly flouted their mandated duty under EU Law to ensure that no negative impacts of development to SAC

I am adding information regarding the unique landscape, history and biodiversity taken from Sligo County Council's Mini Plan -Variation Report 7/10/23. THE UNIQUE GEOGRAPHY, HISTORY, VULNERABILITY AND BIODIVERSITY - does not change - this is fact. The Sligo County Council have through their dereliction of duty in undertaking Appropriate Assessments mandated under EU Law decimated this landscape and biodiversity.

I believe that the EPA has a duty to respond to this serious breach of duty.
I look forward to your response.
Yours faithfully,
Ann McKirdy

EPA 2023
Request for
Assessment &
Input
WWTP
Looped Trail

A93

According to the Strandhill Mini Plan - Variation 1 - 7/10/2013

The Strandhill area has a particularly rich archaeological heritage. The Coolera peninsula was one of the major cultural and ritual centres of Neolithic Ireland (Circa 4500-2500BC) and Knocknarea played an important role asa ritual focal point. Today, this is evidenced by a large concentration of passage tombs, an enclosure and a jhut site complex on the mountain.
The peninsula retained its importance during later prehistory and early medieval times. The Giant's Grave Court tomb on the road to the Airport and the kitchen middens in the townlands of Culleenmore and Culleenduff are also indicators of substantial activity from the Neolithic period onwards.
One of Strandhill's archaeological gems is the ecclesiastical sitte at Killaspugbrone, which includes a ruined medieval church and a graveyard used by the local community in modern times.

Natural Heritage
Uniquely positioned at the coast, 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 diversity of 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)

Ballisodare Baoy SAC Site Code 000622
Cummeen Strand/Drumcliffe Bay SAC 00627
Cummeen Strand Site Code 004035
Ballysadare Bay SPA site code 004129

Gmail

Ann McKirdy <ainenicamhlaidh@gmail.com>

Formal Complaint about Sligo Co. Co. Rezoning -

4 messages

Ann McKirdy <ainenicamhlaidh@gmail.com> Wed, Jun 19, 2024 at 10:44 PM
To: "Info@opr.ie" <info@opr.ie>

Dear Office of Planning regulator,
I am hugely concerned about new rezoning submitted by Novot Holdings for Sligo Town in Maugheraboy, Carraroe, Cairns Hill and Strandhill.
It is very questionable the timing of these proposals. This Holding Company Directorship is not available.
It beggars belief that they can purchase agricultural land and then lobby Sligo Co. Co. to Rezone outside the scrutiny of the Planning Regulator.

Novot holdings are building 74 houses on Cairns Hill, pl 2297 this site has not been rezoned, nor do they have a signed Uisce Eireann agreement which is a pre-requisite for commencement as defined by An Bord \Pleanala and Sligo Co. Co. Planner's Report.
It would appear that this company is colluding with Sligo Co. Co. Paul Maguire is a lobbyist and his declarations are available online. The fact that he has lobbied all of the County Councillors and the Senior Management including Dorothy Clarke and the County Manager Martin Lydon and the Minister of Housing Darragh O'Brien.

The lands in Strandhill are under Omincrest, however, they are the same company in a different name.
Altitude Development which has a live planning application for 99 houses and a creche is also a company under this umbrella group. **2460191**
The OPR noted in their submission to Sligo Co. Co. in Dec 2023 that the maximum housing permitted in the life of the plan would be 70. Sligo Co. Co. has now changed Strandhill to a SATELLITE village, it is no longer a 'village with a special tourism function.' According to their Development Plan - What about the hundreds of thousands of visitors that come to the sea and the new tourists using the trails and walks

MKO is the environment assessment company is also the company that made the submissions on behalf of these entities for rezoning. This is a conflict of interest.

Planning application Planning Ref: 2360226 by Carnavron - is underway on the floodplain, 7 m from the SAC in proximity to the Ramsar site, no appropriate assessment was done. No agreement with Irish Water has been signed, yet it is well underway with some houses almost complete.

I am staggered by this blatant abuse of the planning system. One would have to question these rezoning submissions which appear to be based on insider knowledge propelled by lobbyist to leverage the re-zoning of land in Sligo by unfair engagement with the Public Servants of Sligo Co. Co. and the local elected representatives.

I am seeking a response.
Yours faithfully,
Aine Nic Amhlaidh

5 attachments

- **231123- Maguire_Sligo Draft Development Plan Submission - F3_Re**
  9612K
- **Submission on Draft SDP Cairns Road - F- 2023.12.22 (1).pdf**
  2359K
- **Submission on Draft SDP 2024-2030 (Strandhill Golf Course neighb**
  2368K
- **PAZ 58 Omnicrest Ltd Development Plan Submission _ Strandhill.p**
  711K
- **Carnavron Sligo Development Plan Submission.pdf**
  1054K

June 2024
Rezoning by Lobbying
Strandhill
opposed by OPR & Minister
superceded by Councillors

Ann McKirdy <ainenicamhlaidh@gmail.com> Wed, Jun 19, 2024 at 10:45 PM

To: manager.dau@npws.gov.ie

Dear \Manager,
[Quoted text hidden]

5 attachments

231123- Maguire_Sligo Draft Development Plan Submission - F3_Redacted (1).pdf
9612K

Submission on Draft SDP Cairns Road - F- 2023.12.22 (1).pdf
2359K

Submission on Draft SDP 2024-2030 (Strandhill Golf Course neighbour strandhill.pdf
2368K

PAZ 58 Omnicrest Ltd Development Plan Submission _ Strandhill.pdf
711K

Carnavron Sligo Development Plan Submission.pdf
1054K

Housing Manager DAU <Manager.DAU@npws.gov.ie> Thu, Jun 20, 2024 at 1:43 PM
To: Ann McKirdy <ainenicamhlaidh@gmail.com>

Dear Ms. McKirdy,

I acknowledge receipt of your email below and attachments. The Development Applications Unit (DAU) co-ordinates heritage related referrals to the Minister in their role as a Statutory Consultee for heritage under the planning legislation. Your email regarding the rezoning of lands in Sligo falls outside the remit of DAU and so I have forwarded your email to the Planning section for their attention.

Kind regards,

Joanne

Joanne Lyons

Higher Executive Officer

___

Aonad na nIarratas ar Fhorbairt

Development Applications Unit

Oifigí an Rialtais

Government Offices

Bóthar an Bhaile Nua, Loch Garman, Contae Loch Garman, Y35 AP90

Newtown Road, Wexford, County Wexford, Y35 AP90

___

From: Ann McKirdy <ainenicamhlaidh@gmail.com>
Sent: Wednesday 19 June 2024 22:46
To: Housing Manager DAU <Manager.DAU@npws.gov.ie>
Subject: Fwd: Formal Complaint about Sligo Co. Co. Rezoning -

CAUTION: This eMail originated from outside your organisation and the BTS Managed Desktop service. Do not click on any links or open any attachments unless you recognise the sender or are expecting the email and know that the content is safe. If you are in any doubt, please contact the OGCIO IT Service Desk.

[Quoted text hidden]

Ann McKirdy <ainenicamhlaidh@gmail.com> Fri, Mar 20, 2026 at 7:54 AM
To: Ann McKirdy <ainenicamhlaidh@gmail.com>

[Quoted text hidden]

5 attachments

231123- Maguire_Sligo Draft Development Plan Submission - F3_Redacted (1).pdf
9612K

Submission on Draft SDP Cairns Road - F- 2023.12.22 (1).pdf
2359K

Submission on Draft SDP 2024-2030 (Strandhill Golf Course neighbour strandhill.pdf
2368K

PAZ 58 Omnicrest Ltd Development Plan Submission _ Strandhill.pdf
711K

Carnavron Sligo Development Plan Submission.pdf
1054K

2016

Gmail

Heritage Council

Ann McKirdy <annmckirdy@gmail.com>

Queen Maeve's Cairn, Knocknarea, Sligo

4 messages

Ann McKirdy <annmckirdy@gmail.com> Thu, May 12, 2016 at 1:37 PM
To: idoyle@heritagecouncil.ie

Dear Ian,
I am writing to you to express my grave concern for the recent damage being done to this National Heritage Site since the opening of the National Looped Trail. The Cairn is being damaged by people walking up it and taking stones from it.

It is a very significant cairn on par with Brú Na Boinne.

This requires urgent attention before it is destroyed. The looped trail opened up last year which has seen a huge increase in visitors.

Yours sincerely,

Ann McKirdy

Ian Doyle <idoyle@heritagecouncil.ie> Thu, May 19, 2016 at 3:08 PM
To: "annmckirdy@gmail.com" <annmckirdy@gmail.com>

Dear Ann

Thank you for your email. I contacted Siobhain Ryan, the Sligo County Council Heritage Officer, and we spoke about this issue. She is well aware of these ongoing issues and is currently seeking ways to manage it.

We will try assist the Council in addressing this.

Kind regards,

Ian Doyle

Head of Conservation Services and Archaeology Officer

The Heritage Council of Ireland

Aras na hOidhreachta

Church Lane

Kilkenny

Ireland R95 X264

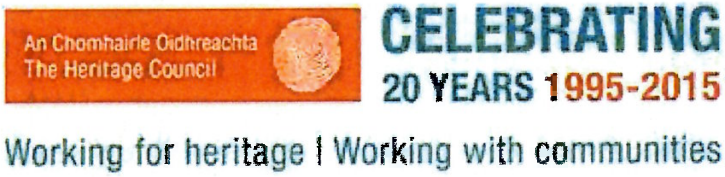
idoyle@heritagecouncil.ie

The Heritage Council

Church Lane, Kilkenny, Co. Kilkenny, Ireland

Tel:+353(0)56 777 0777 |

www.heritagecouncil.ie | www.heritageportal.eu | www.heritageweek.ie



[Quoted text hidden]

Ann McKirdy <annmckirdy@gmail.com> Fri, May 20, 2016 at 4:20 AM
To: Ian Doyle <idoyle@heritagecouncil.ie>

Dear Ian,
Thank you for your reply. It is consoling to know our local heritage officer is aware of this issue given this Neolithic monument dates back to 3400 BC.

Locals speculate that up to 1500 walkers ascend the mountain from the newly opened access on the lower Strandhill side of Knocknarea daily. Their contention is that more damage has been done to the cairn since the opening of this walk than in the previous 5000 years. I am familiar with the walk and believe that the preservation of this cairn merits an urgent archeological conservation assessment.

I assume a heritage conservation assessments was conducted prior to opening this walk, where might I find this assessment?

Many thanks,
Kind regards,

Ann

On 19 May 2016, at 15:08, Ian Doyle <idoyle@heritagecouncil.ie> wrote:

> Dear Ann
>
> Thank you for your email. I contacted Siobhain Ryan, the Sligo County Council Heritage Officer, and we spoke about this issue. She is well aware of these ongoing issues and is currently seeking ways to manage it.
>
> We will try assist the Council in addressing this.
>
> Kind regards,
>
> Ian Doyle
>
> Head of Conservation Services and Archaeology Officer
>
> The Heritage Council of Ireland

Aras na hOidhreachta

Church Lane

Kilkenny

Ireland R95 X264

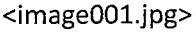
idoyle@heritagecouncil.ie

The Heritage Council

Church Lane, Kilkenny, Co. Kilkenny, Ireland

Tel:+353(0)56 777 0777 |

www.heritagecouncil.ie | www.heritageportal.eu | www.heritageweek.ie



[Quoted text hidden]

Ann McKirdy <annmckirdy@gmail.com> Sat, Jan 8, 2022 at 2:07 PM
To: Aine Nic Amhlaidh <Ainenicamhlaidh@gmail.com>

---------- Forwarded message ---------
From: **Ann McKirdy** <annmckirdy@gmail.com>
Date: Thu, May 12, 2016 at 1:37 PM
Subject: Queen Maeve's Cairn, Knocknarea, Sligo
To: <idoyle@heritagecouncil.ie>
[Quoted text hidden]

Gmail

Ann McKirdy <ainenicamhlaidh@gmail.com>

ATT: Simon Dolon - Sligo Planning - concerns - Upcoming Vote Rezoning Strandhill

4 messages

Ann McKirdy <ainenicamhlaidh@gmail.com>
To: manager.dau@ahg.gov.ie

Fri, May 17, 2024 at 11:05 PM

All County Council Elected officials

---------- Forwarded message ---------
From: **Ann McKirdy** <ainenicamhlaidh@gmail.com>
Date: Wed, 17 Apr 2024 at 23:44
Subject: Upcoming Vote Rezoning Strandhill
To: <TomMacSharry@sligococo.ie>, <dbree@eircom.net>, <ArthurGibbons@sligococo.ie>, <SineadMaguire@sligococo.ie>, <GinoOBoyle@sligococo.ie>, <RosaleenOGrady@sligococo.ie>

Dear Elected Representatives,
I am writing to you with regards to the proposed rezoning of a site for residential development by Scoil Asicus, Strandhill National School, in the village of Strandhill.

- The rezoning of this site will land lock the school.
- It is already at capacity an increase of housing will have to be accommodated in the school which cannot under it's existing footprint and facilities accommodate.
- Currently the children have to alternate play on the pitch as there are inadequate facilities to accommodate the existing enrolled students.
- The road into the school has been a huge concern, it is also the access road for the golf course, the entrance is safe for one vehicle not two way traffic. There is no turning or parking available at the school.
- Children with disabilities have equal rights, these children are being particularly discriminated against, there are no footpaths to connect the school to the residential communities in the village.
- This site rezoning was objected to, it should be designated for sports and recreation as the community does not have a community center.
- The community center that we as a local community fundraised for was sold to Voya. We were promised that we would have be given a community center in the Nation Surf Center, this is NOT the case.
- There is a rumour that there is a proposal to rezone land opposite the Centra Shop in Strandhill - This is adjacent to the County Biodiversity Site at Larass.
- The Appropriate assessment for 51 Homes under Section 179 A beside the school is not correct. This development will require an Environmental Impact Assessment which will stall the process of approval given the FACT that this land is High Ground Water Vulnerable - thus WASTE WATER cannot be disposed of safely without and EIA. The AA states that this site has a status of low ground water vulnerability. This is fact, it can be checked online.
- The AA WWTP assessment for capacity is purposefully misleading giving the Census for residents in Strandhill in 2016 instead of the current census 2022.
- Furthermore the existing waste water treatment plant's Appropriate Assessment was completed in 2007 - this was with a completely different population equivalent.
- moreover, the AA stated that the closest bathing water was Rosses Point - it is in fact 50 meters in front of the WWTP - Blue Rock a popular surfing location.
- The new WWPT was mandated to remain within the footprint of the existing site as the protected whorl snail had been located around the perimeter - the new WWTP is 4-6 times the original footprint
- The bathing waters in Strandhill at the slipway and at Dorrins Strand are evidence that Sligo Co. Co. is aware ot its duty to assess bathing water.

May 2024

All Council officials

Concern

WWTP

Impact of tourism

- Furthermore, the 3 million Euro investment by Failte Ireland and the Sligo Co. Co supports bathing in this water.
- I have been very concerned by the safety of the water at Blue Rock where my children surf, the sewage, maggots and smell from the WWTP prompted my research.
- Under my request for freedom of information in 2021, I discovered that 101,000 visitors used the new looped trails in Strandhill - based on the counters installed in Strandhill prompted by the recorded success by EU Trailblazers.
- The Standhill Market attracts 1500 visitors weekly, thus 60,000 annually
- The Surf Centre attracts 40,000 visitors expected to rise to 50,000 in 2033 per Heather Humphries
- The Caravan Park adds seasonal residents - not included in the Appropriate Assessment of 1,000-1500 residents
- These are just the recorded visitors not including the visitors to the beach. Though visitors are not permanent residents, their presence creates additional strain on the Waste Water Treatment Plant.
- So my question to you as our elected representatives, on top of this extra quarter of a million recorded visitors, is it ok to add more sewage waste into a system that is at capacity without an Environmental Impact Assessment?
- The community center that was supposed to be built in Strandhill was rejected because of the Whorl Snail.
- The extension to the Airport Runway was successfully opposed because of the Whorl Snail.
- The WWTP was built based on the false premise that the Whorl Snail was not present.
- The Appropriate Assessment of this proposed residential development 179 a included a walk over to assess the presence of the Whorl Snail - This is inadequate - as these snails are ground dwelling and not visible on a walk over.

In many respects whether this rezoning is approved for development or not the Elected Representatives of Sligo County Council and Sligo County Council Managers will be held responsible for their disregard for the community and the environment.

I am also attaching my submission to the Draft Development Plan which I received confirmation of receipt for but was excluded from the submissions.

Looped Trail

Reference FOi 127/21

Monthly figures: Queen Maeve Trail	**Knocknarea Trail**	**Airport**	**Strandhill Carrowbunnaun**	**Total**
April 2843 May 2911 June 3696 July 4059 Aug 5138 Sept 2500 Oct 1388	April 2238 May 2442 June 3967 July 4343 Aug 5594 Sept 2086 Oct 1133	April 5195 May 4666 June 4533 July 6312 Aug 4700 Sept 2465 Oct 1344	April 7807 May 8449 June 11909 July 14411 Aug 16272 Sept 8813 Oct 4272	April 18,083 May 18,668 June 24,105 July 53,380 Aug 31,704 Sept 15,864 Oct 8,137
			Total Visitors Apr-Oct 2021 Using trails only	**100,697**

3 attachments

Appendix B Strandhill WWTP & Caravan Park PS AA Screening(1.0) (2).pdf
16812K

Ann McKirdy Draft Climate Action Submission.docx
29K

ground water vulnerability.pdf
1274K

Ann McKirdy <ainenicamhlaidh@gmail.com> Thu, Oct 10, 2024 at 5:58 PM
To: "Info@opr.ie" <info@opr.ie>

24-105-5-OPR
M
[Quoted text hidden]

3 attachments

Appendix B Strandhill WWTP & Caravan Park PS AA Screening(1.0) (2).pdf
16812K

Ann McKirdy Draft Climate Action Submission.docx
29K

ground water vulnerability.pdf
1274K

Ann McKirdy <ainenicamhlaidh@gmail.com> Wed, Mar 18, 2026 at 11:44 PM
To: Ann McKirdy <ainenicamhlaidh@gmail.com>

[Quoted text hidden]

3 attachments

Appendix B Strandhill WWTP & Caravan Park PS AA Screening(1.0) (2).pdf
16812K

Ann McKirdy Draft Climate Action Submission.docx
29K

ground water vulnerability.pdf
1274K

Ann McKirdy <ainenicamhlaidh@gmail.com> Fri, Mar 20, 2026 at 7:39 AM
To: Ann McKirdy <ainenicamhlaidh@gmail.com>

[Quoted text hidden]

Incident 19/10/2022

Gmail

Ann McKirdy <ainenicamhlaidh@gmail.com>

Sea swimming prohibition Dorrins Strand

5 messages

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

Wed, Oct 19, 2022 at 8:08 AM

Prohibition Sea Swimming Sewage in Sea

Sent from my iPhone

4 attachments



IMG_7793.jpg
1210K



IMG_7801.jpg
653K



IMG_7811.jpg
1347K

Incident 2022 Dorrins Strand



IMG_7825.jpg
1180K

Ann McKirdy <ainenicamhlaidh@gmail.com>
To: info@epa.ie

Wed, Oct 19, 2022 at 9:00 AM

To whom it may concern,

I am writing to make a FORMAL ENVIRONMENTAL COMPLAINT ABOUT SLIGO COUNTY COUNCIL. Sligo Co. Co. did not comply with Mandatory European Planning Legislation and did not undertake an Environmental Assessment prior to upgrading the sewage treatment plant under a €16 Funding Scheme. The Killaspugbrone WWTP is located in a European Designated Special Area of Conservation. Neither did Sligo Co. Co. engage with the public in the Part 8 Process which is also mandatory under Planning Act 2000.

I have reported a foul odor from this facility on numerous occasions.

The below Sample Testing undertaken on behalf of Sligo Co. Co and the Prohibition Notices highlight the problem which is a direct result of untreated sewage flowing into the sea at Strandhill/Killaspugbrone and east to Dorrins Strand.

I would like a full investigation into this breach in Planning Legislation and full accountability. This is the location of the Irish Center of Excellence for Surfing. It is also a sea swimming area in Dorrins Strand.

I expect the EPA has been notified by Sligo Co. Co. of this serious ongoing water contamination.

Please send me the FULL REPORT on the investigation into the source of contamination and the redress.

I look forward to hearing from you.
Yours faithfully,
Ann McKirdy
---------- Forwarded message ---------
From: **Ann McKirdy** <annmckirdy@icloud.com>
Date: Wed, Oct 19, 2022 at 8:08 AM
Subject: Sea swimming prohibition Dorrins Strand
To: Ann McKirdy <ainenicamhlaidh@gmail.com>

Sent from my iPhone

---

4 attachments



IMG_7793.jpg
1210K



IMG_7801.jpg
653K



IMG_7811.jpg
1347K



IMG_7825.jpg
1180K

Wexford Receptionist <REC_WEX@epa.ie>
To: Ann McKirdy <ainenicamhlaidh@gmail.com> Wed, Oct 19, 2022 at 9:31 AM

A Chara,

Your correspondence on 19/10/2022 has been forwarded for attention. Tá do chomhfhreagras ón 19/10/2022 seolta ar aghaidh le haghaidh aird.

Le gach dea-ghuí,

Grace Marshall

Duty Receptionist I Organisational Services Team

Office of Communications and Corporate Services, Wexford

Fáilteoir ar Dualgas I Foireann Seirbhísí Eagraíochtúla

An Oifig Cumarsáide agus Seirbhísí Corparáideacha,Loch Garman

053-9160600 (Direct dial)

info@epa.ie

www.epa.ie

[Quoted text hidden]

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

Sun, Mar 15, 2026 at 2:50 PM

[Quoted text hidden]

4 attachments



IMG_7793.jpg
1210K



IMG_7801.jpg
653K



IMG_7811.jpg
1347K



IMG_7825.jpg
1180K

Ann McKirdy <ainenicamhlaidh@gmail.com>
To: Ann McKirdy <ainenicamhlaidh@gmail.com> Fri, Mar 20, 2026 at 7:40 AM

[Quoted text hidden]

---

4 attachments



IMG_7793.jpg
1210K



IMG_7801.jpg
653K



IMG_7811.jpg
1347K



IMG_7825.jpg
1180K

January 2022

From: Ann McKirdy <ainenicamhlaidh@gmail.com>
Sent: Monday 3 January 2022 02:26
To: Tim Roderick (Housing) <Tim.Roderick@housing.gov.ie>
Subject: Fwd: SERIOUS CONCERN - URGENT- following the Formal Complaint SAC - Dunes Strandhill and proposal for further paths over the SAC

CAUTION: This eMail originated from outside your organisation and the BTS Managed Desktop service. Do not click on any links or open any attachments unless you recognise the sender or are expecting the email and know that the content is safe. If you are in any doubt, please contact the OGCIO IT Service Desk at help.it@per.gov.ie

[Quoted text hidden]

refuse FOI

Ann McKirdy <ainenicamhlaidh@gmail.com> Tue, Jan 4, 2022 at 11:17 PM
To: "Tim Roderick (Housing)" <Tim.Roderick@housing.gov.ie>, minister.ryan@decc.gov.ie
Cc: "Donal McWeeney (Housing)" <Donal.McWeeney@housing.gov.ie>

Thank you Tim.
I will follow up as you suggest, however, I am very upset that the Sligo Co. Co. has refused all my recent FOI requests, their reason for refusal was that I had requested too many items this year. The only communication I have succeeded in getting a response to is through FOI, everything else I send goes into the ether, completely ignored.

I recently reported a number of environmental enforcement issues including the draining of Knocknarea mountain on the Rathcarrick side before Christmas 2021, pneumatic drills on a large digger like machine and at least 200 meters of drain piping approximately 30 cm in diameter and 20 feet long. (This is the mountain where the UNESCO world heritage submission is being evaluated. I expect the outcome will be the usual, 'not an enforcement issue.'

Sincerely,
Ann McKirdy
[Quoted text hidden]

Drained Knocknarea mountain pNH

Built New Carport Exempted Dev. per Enforcement

4 attachments



IMG_8639.JPG
1430K



IMG_8633.JPG
1240K

Jan 2022
looped Trail
Drainage of
Knocknarea
for new carpark
Exempted per Sligo Co Co



IMG_8635.JPG
1130K

IMG_8637.MOV
8429K

Ann McKirdy <ainenicamhlaidh@gmail.com>
To: "Info@opr.ie" <info@opr.ie>

Sat, Jan 8, 2022 at 11:29 PM

21-253-11-OPR
[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: "Info@opr.ie" <info@opr.ie>

Tue, Jan 11, 2022 at 11:28 PM

21-253-11-OPR

This is the reply I received some time ago following my formal complaint stating that the consultation with the NPWS noting that an AA was not required, yet this contradicts the Appropriate Assessment carried out in 2013 advising a stage two AA for any proposal over the SAC.

This is not accurate or true.
I have attached photos of the most recent news report on the decimation of the Dunes.
Sincerely,
Ann McKirdy

attached is the facebook for the Strandhill village, the community is outraged, photos, videos and commentary link below.
https://www.facebook.com/groups/241460746585403/?hoisted_section_header_type=recently_seen&multi_permalinks=1018262102238593

---------- Forwarded message ---------
From: **Ann McKirdy** <ainenicamhlaidh@gmail.com>
Date: Thu, Jul 15, 2021 at 5:57 PM
[Quoted text hidden]
[Quoted text hidden]

Ann McKirdy <ainenicamhlaidh@gmail.com> Sun, Mar 15, 2026 at 2:49 PM
To: Ann McKirdy <ainenicamhlaidh@gmail.com>

[Quoted text hidden]

Ann McKirdy <ainenicamhlaidh@gmail.com> Fri, Mar 20, 2026 at 7:46 AM
To: Ann McKirdy <ainenicamhlaidh@gmail.com>

---------- Forwarded message ---------
From: **Ann McKirdy** <ainenicamhlaidh@gmail.com>
[Quoted text hidden]
[Quoted text hidden]

Gmail

OPR

Strandhill Market

Ann McKirdy <ainenicamhlaidh@gmail.com>

May 2024

Controversial Material Contravention of Development Plan Sligo

2 messages

Ann McKirdy <ainenicamhlaidh@gmail.com>
To: "Info@opr.ie" <info@opr.ie>

Fri, May 17, 2024 at 2:43 PM

To whom it may concern,
I am adding another concern to the items I have requested the OPR to investigate.
The Strandhill Airport is located on the SAC.
In 2015 the Strandhill People's Market began using one of the Hangars. This market is very successful, however, no change of use planning application has been submitted. This Market has benefitted from grant funding through a number of schemes.
The concern I have now is another building has been approved in close proximity/within to the boundary of the SAC in December 2023 which is a material contravention of the Development Plan.

I am so upset on two levels, there is a pattern of controversial planning applications in Sligo being pushed through around so close to Christmas that concerned citizens are not aware given they are otherwise occupied during this busy holiday period.
Secondly, this is not adhering to the Planning Regulations 2000 or the management obligations of a competent authority under the EU Habitats Directives.

I am attaching the DAU's submsssions to the Sligo Co. Co on the Draft Development Plan.
I am also attaching the photos of the site and the approval.
I am attaching the screening for AA which cannot be accepted given that Whorl Snail assessment can only be completed between April and September

I have to reiterate my huge concern for the way planning applications are processed in Sligo.
I am one individual concerned for my environment, concerned for the preservation of heritage and cultural identity and concerned that we as custodians preserve beauty and biodiversity for the future generations.
I am also a teacher of children from disadvantaged communities and an advocate for the vulnerable in our society.

The governance of Planning in Sligo has to be managed, these infractions are indicative of a planning system that is not fit for purpose and not adhering to Planning Regulations.

I really appreciate that this submission will entail a lot of research, however, I feel strongly that there has to be oversight and Sligo Co. Co. is not behaving as a competent authority with regards to their obligations to National and European Planning Policies.
Many thanks
Sincerely
Ann McKirdy

9 attachments

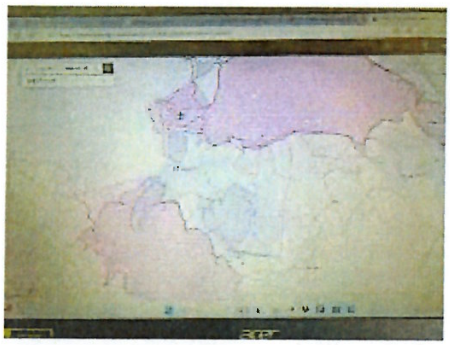


IMG_3923 (1).jpg
807K

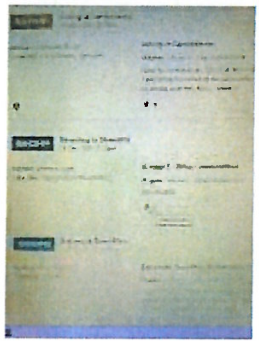
Strandhill Market
May 2024
OPR



IMG_3925 (1).jpg
799K



IMG_3924 (1).jpg
1064K



IMG_3926.jpg
1252K

Strandhill Airport AA Screening inadequate assesssment of lacunae.pdf
1403K

SCDP Reps on Local Plan Sligo Airport 18 12 2023 Final Letter (1).pdf
2489K

Strandhill Airport Rezoning permission granted Strandhill Peoples Market occupies one hangar no change of use planning application or approval.pdf
2489K

DAU Rezoning Tonahubble Sligo Draft Dev Plan 2024 submission.pdf
380K

DAU submission on Draft Dev Plan Sligo for ecological assessment 2024.pdf
644K

Ann McKirdy <ainenicamhlaidh@gmail.com> Fri, Mar 20, 2026 at 7:53 AM
To: Ann McKirdy <ainenicamhlaidh@gmail.com>

[Quoted text hidden]

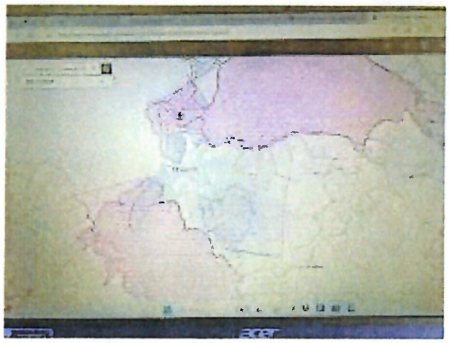
9 attachments



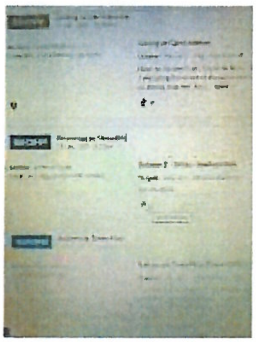
IMG_3923 (1).jpg
807K



IMG_3925 (1).jpg
799K



IMG_3924 (1).jpg
1064K



IMG_3926.jpg
1252K

Strandhill Airport AA Screening inadequate assesssment of lacunae.pdf
1403K

SCDP Reps on Local Plan Sligo Airport 18 12 2023 Final Letter (1).pdf
2489K

Strandhill Airport Rezoning permission granted Strandhill Peoples Market occupies one hangar no change of use planning application or approval.pdf
2489K

DAU Rezoning Tonahubble Sligo Draft Dev Plan 2024 submission.pdf
380K

DAU submission on Draft Dev Plan Sligo for ecological assessment 2024.pdf
644K

Gmail

Camping Tents in Dunes

Ann McKirdy <ainenicamhlaidh@gmail.com>

Partying in Shelly Valley

2 messages

June 2021

Ann McKirdy <ainenicamhlaidh@gmail.com> Wed, Jun 30, 2021 at 11:51 AM
To: sinead maguire <sineadmaguire@yahoo.com>

Dear Sinead,
I want to bring to your attention the fact that kids are being dropped off nightly fir parties in the dunes after 10.30 pm.
I sent photos but not sure you received them.
It seems it's a camp site not too with overnight camping every night.

Please follow up to ensure this is stopped.

Many thanks,
Ann



1E7D6540-7C13-4874-B6A4-62B9D13BA5C1.jpeg
1038K

Tents on Dunes
Shelley Valley
June 2021

Ann McKirdy <ainenicamhlaidh@gmail.com> Fri, Mar 20, 2026 at 8:09 AM
To: Ann McKirdy <ainenicamhlaidh@gmail.com>

[Quoted text hidden]



1E7D6540-7C13-4874-B6A4-62B9D13BA5C1.jpeg
1038K

Gmail

June 2021

Ann McKirdy <ainenicamhlaidh@gmail.com>

Water Safety - Dorrins Strand and Dune Management

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

Sun, Jun 27, 2021 at 3:04 PM

Dune Safety

Hi Sinead,
I hope you are well. I'm writing again about water safety and dune management.

I phoned the Gardai today to alert them to the fact that there is major partying on in the dunes by Shelly Valley after 11 pm these past few nights.
Young people are arriving by taxi to the sea front with suite cases, backpacks and surf boards. They are lighting fires and sliding down the dune face.
The garda said I need to report it when I see it and will not be involved otherwise.

The reason I am writing today is we had an emergency today at Dorrins Strand. A swimmer became Hypothermic after coming out of the water.
Unfortunately there is no vehicular access, she was too weak to walk and we could do nothing to help her.
Thankfully the Airport emergency services came to her assistance. I could not even park my car by the gate as the area by the gate has a huge rock to prevent parking. Moveable bollards are required in place of this for emergencies.

I am strongly opposed to any further paths for pedestrian access, the safety assessments have not been completed, nor has any environmental assessment of the proposed or existing paths over the SAC been undertaken.
This is legislated by EU Law.

Has the Sligo Airport been consulted about the proposal? I believe that pedestrian traffic close to the airport is not safe.

I would like this to be re-tabled at the next Biodiversity meeting.

I trust you understand where I am coming from, safety is a priority. Furthermore, we are seeing the shockingly rapid degradation of the delicate dune system in this special area of conservation.
Kind regards,
Ann McKirdy

No HA Safety Assessment

Dorrins Strand - See Swimmer 100m from WWTP 2021

FOI EPA

No environment assessment WWTP.

Freedom of Information (FOI) Schedule of Records

Summary of Decision Making

FOI Request Ref: FOI-0047-2023

Record No.	Brief description of Record	Decision	Basis for refusal – Section under FOI Act	Reason for Decision
1.	Environment Impact Assessment	Refused	Section 15(1)(a)	Record does not exist
2.	Licence	Refused	Section 15(1)(d)	Records is publicly available
3.	Annual Environmental Report 2022	Refused	Section 15(1)(d)	Records is publicly available

Nov 23 EPA No Environment Assessment Prior to WWTP Development

Office of Environmental Enforcement

Headquarters, PO Box 3000
Johnstown Castle Estate
Co. Wexford, Ireland

Ceanncheathrú, Bosca Poist 3000
Eastát Chaisleán Bhaile Sheáin
Contae Loch Garman, Éire

T: +353 53 916 0600
F: +353 53 916 0699
E: info@epa.ie
W: www.epa.ie

LoCall: 0818 335 599

Ms. Ann McKirdy
Via email: ainenicamhlaidh@gmail.com

09th November 2023

Re: FOI-0047-2023 Decision letter

Dear Ms. McKirdy,

I refer to your request dated 21st October 2023 and received on 23rd October 2023, made under the Freedom of Information Act 2014 (FOI Act), for records held by the Environmental Protection Agency (EPA).

P64
FOI Reply attached
Record does NOT exist

Your request sought:

"I am writing to you with regards to the Strandhill Wastewater Treatment Plant.

I am requesting a copy of the Environment Impact Assessment for the recent upgrade which increased capacity to 3700 PE

I am requesting a copy of the current EPA's WasteWater Discharge Licence for Strandhill WasteWater Treatment Plant.

I am requesting the latest Annual Wastewater Environmental Report relating to Strandhill."

I wish to advise that I, Breege Rooney have made a final decision to refuse your request on 9th November 2023.

SUMMARY OF DECISION
The purpose of this letter is to explain that decision as follows.

1. A schedule listing all the records refused.
2. Fees and
3. Rights of Appeal.

Your request asked for 3 records, and I will address each part separately as follows:

'I am requesting a copy of the Environment Impact Assessment for the recent upgrade which increased capacity to 3700 PE'

The licensee has not submitted an application for increased capacity or an Environmental Impact Assessment in relation to same and so the EPA does not have this record. I must therefore refuse this part of your request under **Section 15(1)(a)** of the Freedom of Information Act 2014 (as amended).

15 (1) A head to whom an FOI request is made may refuse to grant the request where-

> *(a) the record concerned does not exist or cannot be found after all reasonable steps to ascertain its whereabouts have been taken.*

In its search for the record, the EPA has tried to use all practical, possible means for locating the records which you have sought and has taken the steps outlined below to find them:

1. Discussions with individual members of staff who may have dealt with such records.
2. Circulation of an e-mail to all relevant EPA staff, which set out the records you sought and asking staff to check if they had any records or information relating to your request.

The other two parts of your request were:
'I am requesting a copy of the current EPA's WasteWater Discharge Licence for Strandhill WasteWater Treatment Plant.

I am requesting the latest Annual Wastewater Environmental Report relating to Strandhill."

You can find a copy of the waste water discharge licence and any amendments to the licence on the EPA's website in the Leap area (Licence & Enforcement Access Portal) of the site here https://leap.epa.ie/licence-profile/D0107 . After entering the site choose Licence Versions tab, Licensing Documents, View EPA documents and then Final Decision.

The latest Annual Environmental Report(AER) submitted to the EPA is for 2022 and this is available again on the Leap area of the EPA website here https://leap.epa.ie/licence-profile/D0107 under latest compliance records reference LR077805.

As the above 2 records i.e., the licence and the AER are available publicly I am refusing theses parts of your request under **Section 15(1)(d)** of the Freedom of Information Act 2014 (as amended).

15 (1) A head to whom an FOI request is made may refuse to grant the request where-

> *(d) the information is already in the public domain.*

1. Schedule of records

Please find at the end of this letter a schedule of records listing all the records the EPA has and is refusing as they either do not exist or are available publicly.

2. Fees

Section 27 of the FOI Act, provides for the charging of fees in relation to costs associated with search, retrieval and copying of records. Fees aree charged in accordance with the details on the EPA's website. Please note that the fee is waived in this case as the cost is less than €100.

3. Rights of Appeal

If you are unhappy with this decision, you may appeal it. In the event that you wish to make such an appeal, you can do so by writing to the Freedom of Information Officer, Environmental Protection Agency, PO Box 3000, Johnstown Castle Estate, County Wexford or by e-mail to foi@epa.ie.

You should make your appeal within 4 weeks (20 working days) from the date of this notification, where a day is defined as a working day excluding, the weekend and public holidays. However, the making of a late appeal may be permitted in appropriate circumstances. The appeal will involve a complete reconsideration of the matter by a more senior member of the staff of this body.

Your correspondence should include a fee of €30 for processing the appeal. Payment should be made by way of bank draft, money order, postal order or personal cheque made payable to Environmental Protection Agency. If you wish to make payment by electronic means please contact Ana Bolger, FOI Officer on 053 9160675.

Publication

All non-personal FOI requests will be recorded on an FOI disclosure log which will be published on the Agency's website in due course.

Yours sincerely,

Breege Rooney

Breege Rooney,
FOI Decision Maker,
Office of Environmental Enforcement.

Gmail

Ann McKirdy <ainenicamhlaidh@gmail.com>

ATT: Simon Dolon - Sligo Planning - concerns - Upcoming Vote Rezoning Strandhill

4 messages

Ann McKirdy <ainenicamhlaidh@gmail.com>
To: manager.dau@ahg.gov.ie

Fri, May 17, 2024 at 11:05 PM

All County Council Elected officials

---------- Forwarded message ---------
From: **Ann McKirdy** <ainenicamhlaidh@gmail.com>
Date: Wed, 17 Apr 2024 at 23:44
Subject: Upcoming Vote Rezoning Strandhill
To: <TomMacSharry@sligococo.ie>, <dbree@eircom.net>, <ArthurGibbons@sligococo.ie>, <SineadMaguire@sligococo.ie>, <GinoOBoyle@sligococo.ie>, <RosaleenOGrady@sligococo.ie>

Dear Elected Representatives,
I am writing to you with regards to the proposed rezoning of a site for residential development by Scoil Asicus, Strandhill National School, in the village of Strandhill.

- The rezoning of this site will land lock the school.
- It is already at capacity an increase of housing will have to be accommodated in the school which cannot under it's existing footprint and facilities accommodate.
- Currently the children have to alternate play on the pitch as there are inadequate facilities to accommodate the existing enrolled students.
- The road into the school has been a huge concern, it is also the access road for the golf course, the entrance is safe for one vehicle not two way traffic. There is no turning or parking available at the school.
- Children with disabilities have equal rights, these children are being particularly discriminated against, there are no footpaths to connect the school to the residential communities in the village.
- This site rezoning was objected to, it should be designated for sports and recreation as the community does not have a community center.
- The community center that we as a local community fundraised for was sold to Voya. We were promised that we would have be given a community center in the Nation Surf Center, this is NOT the case.
- There is a rumour that there is a proposal to rezone land opposite the Centra Shop in Strandhill - This is adjacent to the County Biodiversity Site at Larass.
- The Appropriate assessment for 51 Homes under Section 179 A beside the school is not correct. This development will require an Environmental Impact Assessment which will stall the process of approval given the FACT that this land is High Ground Water Vulnerable - thus WASTE WATER cannot be disposed of safely without and EIA. The AA states that this site has a status of low ground water vulnerability. This is fact, it can be checked online.
- The AA WWTP assessment for capacity is purposefully misleading giving the Census for residents in Strandhill in 2016 instead of the current census 2022.
- Furthermore the existing waste water treatment plant's Appropriate Assessment was completed in 2007 - this was with a completely different population equivalent.
- moreover, the AA stated that the closest bathing water was Rosses Point - it is in fact 50 meters in front of the WWTP - Blue Rock a popular surfing location.
- The new WWPT was mandated to remain within the footprint of the existing site as the protected whorl snail had been located around the perimeter - the new WWTP is 4-6 times the original footprint
- The bathing waters in Strandhill at the slipway and at Dorrins Strand are evidence that Sligo Co. Co. is aware ot its duty to assess bathing water.

May 2024

All Council officials

Concern

WWTP

Impact of tourism

- Furthermore, the 3 million Euro investment by Failte Ireland and the Sligo Co. Co supports bathing in this water.
- I have been very concerned by the safety of the water at Blue Rock where my children surf, the sewage, maggots and smell from the WWTP prompted my research.
- Under my request for freedom of information in 2021, I discovered that 101,000 visitors used the new looped trails in Strandhill - based on the counters installed in Strandhill prompted by the recorded success by EU Trailblazers.
- The Standhill Market attracts 1500 visitors weekly, thus 60,000 annually
- The Surf Centre attracts 40,000 visitors expected to rise to 50,000 in 2033 per Heather Humphries
- The Caravan Park adds seasonal residents - not included in the Appropriate Assessment of 1,000-1500 residents
- These are just the recorded visitors not including the visitors to the beach. Though visitors are not permanent residents, their presence creates additional strain on the Waste Water Treatment Plant.
- So my question to you as our elected representatives, on top of this extra quarter of a million recorded visitors, is it ok to add more sewage waste into a system that is at capacity without an Environmental Impact Assessment?
- The community center that was supposed to be built in Strandhill was rejected because of the Whorl Snail.
- The extension to the Airport Runway was successfully opposed because of the Whorl Snail.
- The WWTP was built based on the false premise that the Whorl Snail was not present.
- The Appropriate Assessment of this proposed residential development 179 a included a walk over to assess the presence of the Whorl Snail - This is inadequate - as these snails are ground dwelling and not visible on a walk over.

In many respects whether this rezoning is approved for development or not the Elected Representatives of Sligo County Council and Sligo County Council Managers will be held responsible for their disregard for the community and the environment.

I am also attaching my submission to the Draft Development Plan which I received confirmation of receipt for but was excluded from the submissions.

Looped Trail

Reference FOi 127/21

Monthly figures: Queen Maeve Trail	**Knocknarea Trail**	**Airport**	**Strandhill Carrowbunnaun**	**Total**
April 2843 May 2911 June 3696 July 4059 Aug 5138 Sept 2500 Oct 1388	April 2238 May 2442 June 3967 July 4343 Aug 5594 Sept 2086 Oct 1133	April 5195 May 4666 June 4533 July 6312 Aug 4700 Sept 2465 Oct 1344	April 7807 May 8449 June 11909 July 14411 Aug 16272 Sept 8813 Oct 4272	April 18,083 May 18,668 June 24,105 July 53,380 Aug 31,704 Sept 15,864 Oct 8,137
			Total Visitors Apr-Oct 2021 Using trails only	**100,697**

3 attachments

Appendix B Strandhill WWTP & Caravan Park PS AA Screening(1.0) (2).pdf
16812K

Ann McKirdy Draft Climate Action Submission.docx
29K

ground water vulnerability.pdf
1274K

Ann McKirdy <ainenicamhlaidh@gmail.com> Thu, Oct 10, 2024 at 5:58 PM
To: "Info@opr.ie" <info@opr.ie>

24-105-5-OPR
M
[Quoted text hidden]

3 attachments

Appendix B Strandhill WWTP & Caravan Park PS AA Screening(1.0) (2).pdf
16812K

Ann McKirdy Draft Climate Action Submission.docx
29K

ground water vulnerability.pdf
1274K

Ann McKirdy <ainenicamhlaidh@gmail.com> Wed, Mar 18, 2026 at 11:44 PM
To: Ann McKirdy <ainenicamhlaidh@gmail.com>

[Quoted text hidden]

3 attachments

Appendix B Strandhill WWTP & Caravan Park PS AA Screening(1.0) (2).pdf
16812K

Ann McKirdy Draft Climate Action Submission.docx
29K

ground water vulnerability.pdf
1274K

Ann McKirdy <ainenicamhlaidh@gmail.com> Fri, Mar 20, 2026 at 7:39 AM
To: Ann McKirdy <ainenicamhlaidh@gmail.com>

[Quoted text hidden]

Incident 19/10/2022

Gmail

Ann McKirdy <ainenicamhlaidh@gmail.com>

Sea swimming prohibition Dorrins Strand

5 messages

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

Wed, Oct 19, 2022 at 8:08 AM

Prohibition Sea Swimming Sewage in Sea

Sent from my iPhone

4 attachments



IMG_7793.jpg
1210K



IMG_7801.jpg
653K



IMG_7811.jpg
1347K

Incident 2022 Dorrins Strand



IMG_7825.jpg
1180K

Ann McKirdy <ainenicamhlaidh@gmail.com>
To: info@epa.ie

Wed, Oct 19, 2022 at 9:00 AM

To whom it may concern,

I am writing to make a FORMAL ENVIRONMENTAL COMPLAINT ABOUT SLIGO COUNTY COUNCIL. Sligo Co. Co. did not comply with Mandatory European Planning Legislation and did not undertake an Environmental Assessment prior to upgrading the sewage treatment plant under a €16 Funding Scheme. The Killaspugbrone WWTP is located in a European Designated Special Area of Conservation. Neither did Sligo Co. Co. engage with the public in the Part 8 Process which is also mandatory under Planning Act 2000.

I have reported a foul odor from this facility on numerous occasions.

The below Sample Testing undertaken on behalf of Sligo Co. Co and the Prohibition Notices highlight the problem which is a direct result of untreated sewage flowing into the sea at Strandhill/Killaspugbrone and east to Dorrins Strand.

I would like a full investigation into this breach in Planning Legislation and full accountability. This is the location of the Irish Center of Excellence for Surfing. It is also a sea swimming area in Dorrins Strand.

I expect the EPA has been notified by Sligo Co. Co. of this serious ongoing water contamination.

Please send me the FULL REPORT on the investigation into the source of contamination and the redress.

I look forward to hearing from you.
Yours faithfully,
Ann McKirdy
---------- Forwarded message ---------
From: **Ann McKirdy** <annmckirdy@icloud.com>
Date: Wed, Oct 19, 2022 at 8:08 AM
Subject: Sea swimming prohibition Dorrins Strand
To: Ann McKirdy <ainenicamhlaidh@gmail.com>

Sent from my iPhone

---

4 attachments



IMG_7793.jpg
1210K



IMG_7801.jpg
653K



IMG_7811.jpg
1347K



IMG_7825.jpg
1180K

Wexford Receptionist <REC_WEX@epa.ie>
To: Ann McKirdy <ainenicamhlaidh@gmail.com> Wed, Oct 19, 2022 at 9:31 AM

A Chara,

Your correspondence on 19/10/2022 has been forwarded for attention. Tá do chomhfhreagras ón 19/10/2022 seolta ar aghaidh le haghaidh aird.

Le gach dea-ghuí,

Grace Marshall

Duty Receptionist I Organisational Services Team

Office of Communications and Corporate Services, Wexford

Fáilteoir ar Dualgas I Foireann Seirbhísí Eagraíochtúla

An Oifig Cumarsáide agus Seirbhísí Corparáideacha,Loch Garman

053-9160600 (Direct dial)

info@epa.ie

www.epa.ie

[Quoted text hidden]

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

Sun, Mar 15, 2026 at 2:50 PM

[Quoted text hidden]

4 attachments



IMG_7793.jpg
1210K



IMG_7801.jpg
653K



IMG_7811.jpg
1347K



IMG_7825.jpg
1180K

Ann McKirdy <ainenicamhlaidh@gmail.com>
To: Ann McKirdy <ainenicamhlaidh@gmail.com> Fri, Mar 20, 2026 at 7:40 AM

[Quoted text hidden]

---

4 attachments



IMG_7793.jpg
1210K



IMG_7801.jpg
653K



IMG_7811.jpg
1347K



IMG_7825.jpg
1180K

January 2022

From: Ann McKirdy <ainenicamhlaidh@gmail.com>
Sent: Monday 3 January 2022 02:26
To: Tim Roderick (Housing) <Tim.Roderick@housing.gov.ie>
Subject: Fwd: SERIOUS CONCERN - URGENT- following the Formal Complaint SAC - Dunes Strandhill and proposal for further paths over the SAC

CAUTION: This eMail originated from outside your organisation and the BTS Managed Desktop service. Do not click on any links or open any attachments unless you recognise the sender or are expecting the email and know that the content is safe. If you are in any doubt, please contact the OGCIO IT Service Desk at help.it@per.gov.ie

[Quoted text hidden]

refuse FOI

Ann McKirdy <ainenicamhlaidh@gmail.com> Tue, Jan 4, 2022 at 11:17 PM
To: "Tim Roderick (Housing)" <Tim.Roderick@housing.gov.ie>, minister.ryan@decc.gov.ie
Cc: "Donal McWeeney (Housing)" <Donal.McWeeney@housing.gov.ie>

Thank you Tim.
I will follow up as you suggest, however, I am very upset that the Sligo Co. Co. has refused all my recent FOI requests, their reason for refusal was that I had requested too many items this year. The only communication I have succeeded in getting a response to is through FOI, everything else I send goes into the ether, completely ignored.

I recently reported a number of environmental enforcement issues including the draining of Knocknarea mountain on the Rathcarrick side before Christmas 2021, pneumatic drills on a large digger like machine and at least 200 meters of drain piping approximately 30 cm in diameter and 20 feet long. (This is the mountain where the UNESCO world heritage submission is being evaluated. I expect the outcome will be the usual, 'not an enforcement issue.'

Sincerely,
Ann McKirdy
[Quoted text hidden]

Drained Knocknarea mountain pNH

Built New Carport Exempted Dev. per Enforcement

4 attachments



IMG_8639.JPG
1430K



IMG_8633.JPG
1240K

Jan 2022
looped Trail
Drainage of
Knocknarea
for new carpark
Exempted per Sligo Co Co



IMG_8635.JPG
1130K

IMG_8637.MOV
8429K

Ann McKirdy <ainenicamhlaidh@gmail.com>
To: "Info@opr.ie" <info@opr.ie>

Sat, Jan 8, 2022 at 11:29 PM

21-253-11-OPR
[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: "Info@opr.ie" <info@opr.ie>

Tue, Jan 11, 2022 at 11:28 PM

21-253-11-OPR

This is the reply I received some time ago following my formal complaint stating that the consultation with the NPWS noting that an AA was not required, yet this contradicts the Appropriate Assessment carried out in 2013 advising a stage two AA for any proposal over the SAC.

This is not accurate or true.
I have attached photos of the most recent news report on the decimation of the Dunes.
Sincerely,
Ann McKirdy

attached is the facebook for the Strandhill village, the community is outraged, photos, videos and commentary link below.
https://www.facebook.com/groups/241460746585403/?hoisted_section_header_type=recently_seen&multi_permalinks=1018262102238593

---------- Forwarded message ---------
From: **Ann McKirdy** <ainenicamhlaidh@gmail.com>
Date: Thu, Jul 15, 2021 at 5:57 PM
[Quoted text hidden]
[Quoted text hidden]

Ann McKirdy <ainenicamhlaidh@gmail.com> Sun, Mar 15, 2026 at 2:49 PM
To: Ann McKirdy <ainenicamhlaidh@gmail.com>

[Quoted text hidden]

Ann McKirdy <ainenicamhlaidh@gmail.com> Fri, Mar 20, 2026 at 7:46 AM
To: Ann McKirdy <ainenicamhlaidh@gmail.com>

---------- Forwarded message ---------
From: **Ann McKirdy** <ainenicamhlaidh@gmail.com>
[Quoted text hidden]
[Quoted text hidden]

Gmail

OPR

Strandhill Market

Ann McKirdy <ainenicamhlaidh@gmail.com>

May 2024

Controversial Material Contravention of Development Plan Sligo

2 messages

Ann McKirdy <ainenicamhlaidh@gmail.com>
To: "Info@opr.ie" <info@opr.ie>

Fri, May 17, 2024 at 2:43 PM

To whom it may concern,
I am adding another concern to the items I have requested the OPR to investigate.
The Strandhill Airport is located on the SAC.
In 2015 the Strandhill People's Market began using one of the Hangars. This market is very successful, however, no change of use planning application has been submitted. This Market has benefitted from grant funding through a number of schemes.
The concern I have now is another building has been approved in close proximity/within to the boundary of the SAC in December 2023 which is a material contravention of the Development Plan.

I am so upset on two levels, there is a pattern of controversial planning applications in Sligo being pushed through around so close to Christmas that concerned citizens are not aware given they are otherwise occupied during this busy holiday period.
Secondly, this is not adhering to the Planning Regulations 2000 or the management obligations of a competent authority under the EU Habitats Directives.

I am attaching the DAU's submsssions to the Sligo Co. Co on the Draft Development Plan.
I am also attaching the photos of the site and the approval.
I am attaching the screening for AA which cannot be accepted given that Whorl Snail assessment can only be completed between April and September

I have to reiterate my huge concern for the way planning applications are processed in Sligo.
I am one individual concerned for my environment, concerned for the preservation of heritage and cultural identity and concerned that we as custodians preserve beauty and biodiversity for the future generations.
I am also a teacher of children from disadvantaged communities and an advocate for the vulnerable in our society.

The governance of Planning in Sligo has to be managed, these infractions are indicative of a planning system that is not fit for purpose and not adhering to Planning Regulations.

I really appreciate that this submission will entail a lot of research, however, I feel strongly that there has to be oversight and Sligo Co. Co. is not behaving as a competent authority with regards to their obligations to National and European Planning Policies.
Many thanks
Sincerely
Ann McKirdy

9 attachments

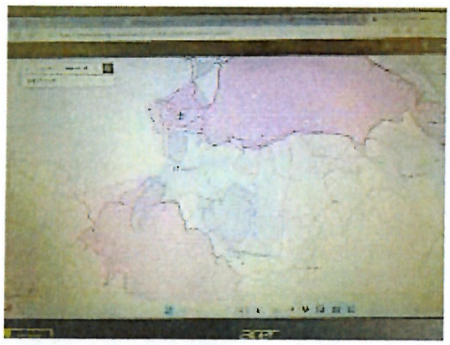


IMG_3923 (1).jpg
807K

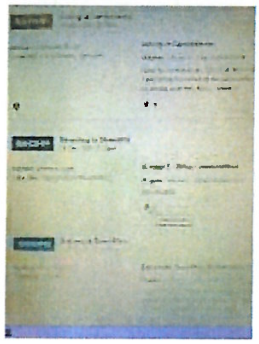
Strandhill Market
May 2024
OPR



IMG_3925 (1).jpg
799K



IMG_3924 (1).jpg
1064K



IMG_3926.jpg
1252K

Strandhill Airport AA Screening inadequate assesssment of lacunae.pdf
1403K

SCDP Reps on Local Plan Sligo Airport 18 12 2023 Final Letter (1).pdf
2489K

Strandhill Airport Rezoning permission granted Strandhill Peoples Market occupies one hangar no change of use planning application or approval.pdf
2489K

DAU Rezoning Tonahubble Sligo Draft Dev Plan 2024 submission.pdf
380K

DAU submission on Draft Dev Plan Sligo for ecological assessment 2024.pdf
644K

Ann McKirdy <ainenicamhlaidh@gmail.com> Fri, Mar 20, 2026 at 7:53 AM
To: Ann McKirdy <ainenicamhlaidh@gmail.com>

[Quoted text hidden]

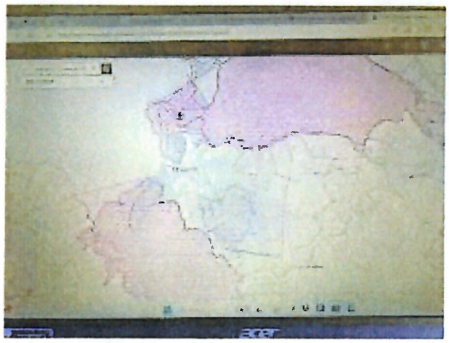
9 attachments



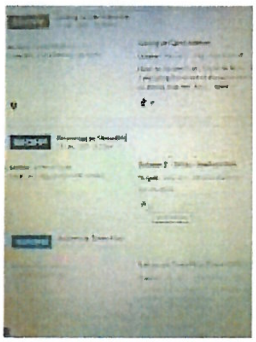
IMG_3923 (1).jpg
807K



IMG_3925 (1).jpg
799K



IMG_3924 (1).jpg
1064K



IMG_3926.jpg
1252K

Strandhill Airport AA Screening inadequate assesssment of lacunae.pdf
1403K

SCDP Reps on Local Plan Sligo Airport 18 12 2023 Final Letter (1).pdf
2489K

Strandhill Airport Rezoning permission granted Strandhill Peoples Market occupies one hangar no change of use planning application or approval.pdf
2489K

DAU Rezoning Tonahubble Sligo Draft Dev Plan 2024 submission.pdf
380K

DAU submission on Draft Dev Plan Sligo for ecological assessment 2024.pdf
644K

Gmail

Camping Tents in Dunes

Ann McKirdy <ainenicamhlaidh@gmail.com>

Partying in Shelly Valley

2 messages

June 2021

Ann McKirdy <ainenicamhlaidh@gmail.com> Wed, Jun 30, 2021 at 11:51 AM
To: sinead maguire <sineadmaguire@yahoo.com>

Dear Sinead,
I want to bring to your attention the fact that kids are being dropped off nightly fir parties in the dunes after 10.30 pm.
I sent photos but not sure you received them.
It seems it's a camp site not too with overnight camping every night.

Please follow up to ensure this is stopped.

Many thanks,
Ann



1E7D6540-7C13-4874-B6A4-62B9D13BA5C1.jpeg
1038K

Tents on Dunes
Shelley Valley
June 2021

Ann McKirdy <ainenicamhlaidh@gmail.com> Fri, Mar 20, 2026 at 8:09 AM
To: Ann McKirdy <ainenicamhlaidh@gmail.com>

[Quoted text hidden]



1E7D6540-7C13-4874-B6A4-62B9D13BA5C1.jpeg
1038K

Gmail

June 2021

Ann McKirdy <ainenicamhlaidh@gmail.com>

Water Safety - Dorrins Strand and Dune Management

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

Sun, Jun 27, 2021 at 3:04 PM

Dune Safety

Hi Sinead,
I hope you are well. I'm writing again about water safety and dune management.

I phoned the Gardai today to alert them to the fact that there is major partying on in the dunes by Shelly Valley after 11 pm these past few nights.
Young people are arriving by taxi to the sea front with suite cases, backpacks and surf boards. They are lighting fires and sliding down the dune face.
The garda said I need to report it when I see it and will not be involved otherwise.

The reason I am writing today is we had an emergency today at Dorrins Strand. A swimmer became Hypothermic after coming out of the water.
Unfortunately there is no vehicular access, she was too weak to walk and we could do nothing to help her.
Thankfully the Airport emergency services came to her assistance. I could not even park my car by the gate as the area by the gate has a huge rock to prevent parking. Moveable bollards are required in place of this for emergencies.

I am strongly opposed to any further paths for pedestrian access, the safety assessments have not been completed, nor has any environmental assessment of the proposed or existing paths over the SAC been undertaken.
This is legislated by EU Law.

Has the Sligo Airport been consulted about the proposal? I believe that pedestrian traffic close to the airport is not safe.

I would like this to be re-tabled at the next Biodiversity meeting.

I trust you understand where I am coming from, safety is a priority. Furthermore, we are seeing the shockingly rapid degradation of the delicate dune system in this special area of conservation.
Kind regards,
Ann McKirdy

No HA Safety Assessment

Dorrins Strand - See Swimmer 100m from WWTP 2021

FOI EPA

No environment assessment WWTP.

Freedom of Information (FOI) Schedule of Records

Summary of Decision Making

FOI Request Ref: FOI-0047-2023

Record No.	Brief description of Record	Decision	Basis for refusal – Section under FOI Act	Reason for Decision
1.	Environment Impact Assessment	Refused	Section 15(1)(a)	Record does not exist
2.	Licence	Refused	Section 15(1)(d)	Records is publicly available
3.	Annual Environmental Report 2022	Refused	Section 15(1)(d)	Records is publicly available

Nov 23 EPA No Environment Assessment Prior to WWTP Development

Office of Environmental Enforcement

Headquarters, PO Box 3000
Johnstown Castle Estate
Co. Wexford, Ireland

Ceanncheathrú, Bosca Poist 3000
Eastát Chaisleán Bhaile Sheáin
Contae Loch Garman, Éire

T: +353 53 916 0600
F: +353 53 916 0699
E: info@epa.ie
W: www.epa.ie

LoCall: 0818 335 599

Ms. Ann McKirdy
Via email: ainenicamhlaidh@gmail.com

09th November 2023

Re: FOI-0047-2023 Decision letter

Dear Ms. McKirdy,

I refer to your request dated 21st October 2023 and received on 23rd October 2023, made under the Freedom of Information Act 2014 (FOI Act), for records held by the Environmental Protection Agency (EPA).

P64
FOI Reply attached
Record does NOT exist

Your request sought:

"I am writing to you with regards to the Strandhill Wastewater Treatment Plant.

I am requesting a copy of the Environment Impact Assessment for the recent upgrade which increased capacity to 3700 PE

I am requesting a copy of the current EPA's WasteWater Discharge Licence for Strandhill WasteWater Treatment Plant.

I am requesting the latest Annual Wastewater Environmental Report relating to Strandhill."

I wish to advise that I, Breege Rooney have made a final decision to refuse your request on 9th November 2023.

SUMMARY OF DECISION
The purpose of this letter is to explain that decision as follows.

1. A schedule listing all the records refused.
2. Fees and
3. Rights of Appeal.

Your request asked for 3 records, and I will address each part separately as follows:

'I am requesting a copy of the Environment Impact Assessment for the recent upgrade which increased capacity to 3700 PE'

The licensee has not submitted an application for increased capacity or an Environmental Impact Assessment in relation to same and so the EPA does not have this record. I must therefore refuse this part of your request under **Section 15(1)(a)** of the Freedom of Information Act 2014 (as amended).

15 (1) A head to whom an FOI request is made may refuse to grant the request where-

> *(a) the record concerned does not exist or cannot be found after all reasonable steps to ascertain its whereabouts have been taken.*

In its search for the record, the EPA has tried to use all practical, possible means for locating the records which you have sought and has taken the steps outlined below to find them:

1. Discussions with individual members of staff who may have dealt with such records.
2. Circulation of an e-mail to all relevant EPA staff, which set out the records you sought and asking staff to check if they had any records or information relating to your request.

The other two parts of your request were:
'I am requesting a copy of the current EPA's WasteWater Discharge Licence for Strandhill WasteWater Treatment Plant.

I am requesting the latest Annual Wastewater Environmental Report relating to Strandhill."

You can find a copy of the waste water discharge licence and any amendments to the licence on the EPA's website in the Leap area (Licence & Enforcement Access Portal) of the site here https://leap.epa.ie/licence-profile/D0107 . After entering the site choose Licence Versions tab, Licensing Documents, View EPA documents and then Final Decision.

The latest Annual Environmental Report(AER) submitted to the EPA is for 2022 and this is available again on the Leap area of the EPA website here https://leap.epa.ie/licence-profile/D0107 under latest compliance records reference LR077805.

As the above 2 records i.e., the licence and the AER are available publicly I am refusing theses parts of your request under **Section 15(1)(d)** of the Freedom of Information Act 2014 (as amended).

15 (1) A head to whom an FOI request is made may refuse to grant the request where-

> *(d) the information is already in the public domain.*

1. Schedule of records

Please find at the end of this letter a schedule of records listing all the records the EPA has and is refusing as they either do not exist or are available publicly.

2. Fees

Section 27 of the FOI Act, provides for the charging of fees in relation to costs associated with search, retrieval and copying of records. Fees aree charged in accordance with the details on the EPA's website. Please note that the fee is waived in this case as the cost is less than €100.

3. Rights of Appeal

If you are unhappy with this decision, you may appeal it. In the event that you wish to make such an appeal, you can do so by writing to the Freedom of Information Officer, Environmental Protection Agency, PO Box 3000, Johnstown Castle Estate, County Wexford or by e-mail to foi@epa.ie.

You should make your appeal within 4 weeks (20 working days) from the date of this notification, where a day is defined as a working day excluding, the weekend and public holidays. However, the making of a late appeal may be permitted in appropriate circumstances. The appeal will involve a complete reconsideration of the matter by a more senior member of the staff of this body.

Your correspondence should include a fee of €30 for processing the appeal. Payment should be made by way of bank draft, money order, postal order or personal cheque made payable to Environmental Protection Agency. If you wish to make payment by electronic means please contact Ana Bolger, FOI Officer on 053 9160675.

Publication

All non-personal FOI requests will be recorded on an FOI disclosure log which will be published on the Agency's website in due course.

Yours sincerely,

Breege Rooney

Breege Rooney,
FOI Decision Maker,
Office of Environmental Enforcement.

Gmail

Ann McKirdy <ainenicamhlaidh@gmail.com>

SERIOUS CONCERN - URGENT- following the Formal Complaint SAC - Dunes Strandhill and proposal for further paths over the SAC

10 messages

Ann McKirdy <ainenicamhlaidh@gmail.com>
To: natureconservation@housing.gov.ie

Thu, Jul 15, 2021 at 5:57 PM

Killaspugbrone

To whom it may concern,
I am notifying the National Parks and Wildlife of another proposed path in Killaspugbrone, Strandhill. This proposal is to run a path over the SAC by the National Heritage sure to bring people to the Killaspugbrone beach and Dorrins Strand.
This is an SAC. The impact of the paths which have been installed already have caused extensive irreversible damage over these special areas of biodiversity and conservation. The dunes have been decimated by tramping. I have reported adults coming down the dunes on toboggans, up to 20 texts inside the dunes system where revellers come to party. Moreover, the Sligo Co Co gave permission to the film makers of Ireland's Fittest Family to film the challenge of timed running up the dune face in Shelly Valley, Strandhill. This was broadcast several times on National TV. I have intercepted several football teams , squads of young men, from Sligo Leitrim and Roscommon and alerted them to the SAC status of the dunes and the prohibition for tramping.
It's a disgrace that the Sligo Co Co has not done a proper appropriate assessment. They have advised that in the screening process in conjunction with the NPWS this was not seen to have an impact on the SAC due to the limited scope of potential damage to the SAC. This is outrageous.

The Sligo Tourism has campaigned heavily and promoted this area for tourism, the paths are overrun.

This is not a minor scale, this is decimation on a grand scale.

To whom shall I address my concern? Is this within the remit of the NPWS ? An investigation needs to be undertaken urgently. This is an environmental catastrophe.

Please advise,
Sincerely,
Ann McKirdy

Sent Sligo Co. Co. Formal Complaint July 2021

---------- Forwarded message ----------
From: **Siobhan Gillen** <sgillen@sligococo.ie>
Date: Thursday, July 15, 2021
Subject: Formal Complaint SAC - Dunes Strandhill and proposal for further paths over the SAC
To: Ann McKirdy <ainenicamhlaidh@gmail.com>

15th July 2021

By e-mail:

ainenicamhlaidh@gmail.com

Email attached. Sligo Co. Co. Refused all of my future FOI requests

See pg 10/12

RE: Complaint to Chief Executive on 9th July 2021

Dear Ms McKirdy,

I acknowledge receipt of your complaint in relation to the development of the Killaspugbrone Looped Walking Trail. In particular, you question the lack of an Appropriate Assessment being carried out prior to undertaking this project.

Under the Habitats Directive, an appropriate assessment is required if a project has the potential to have a significant effect on the Natura 2000 network of designated sites. As part of the preparation of the Killaspugbrone Looped Trail in 2014, the proposed works were screened by Sligo County Council to determine whether or not they would have significant effects on either the Cummeen Strand / Drumcliff Bay SAC or the Cummeen Strand SPA. This screening process was carried out in consultation with the National Parks and Wildlife Service of the Department of Arts, Heritage and the Gaeltacht and concluded that:

'Having regard to the limited scale of the proposed development and the fact that it will not impact on the qualifying interests of the Cummeen Strand / Drumcliff Bay SAC and the Cummeen Strand SPA, it can be objectively concluded that there are not likely to be significant effects on the Natura 2000 sites arising from the proposed development.'

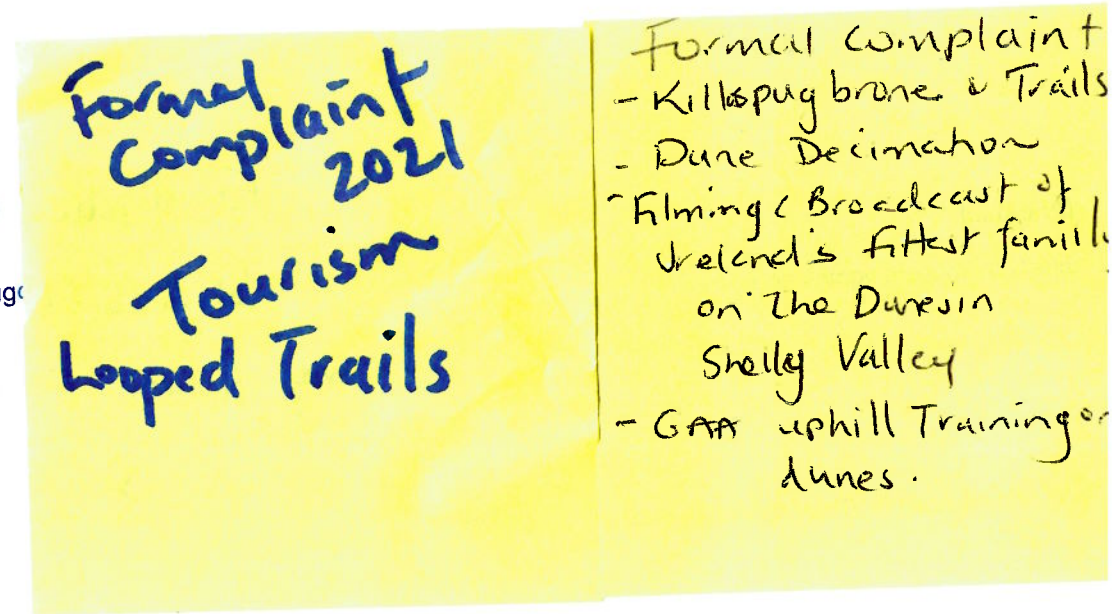
On the basis of the above determination, a full appropriate assessment was not required to be undertaken in respect of the proposed Looped Trail project.

With regard to your wider concerns about the effects of human activities on our sensitive coastal dunes, it is acknowledged that unmanaged trampling by beach visitors places significant pressure on these vulnerable ecosystems. The use of managed trails like the Killaspugprone Looped Walking Trail combined with appropriate signage (both wayfinding and educational) are well accepted measures to reduce the negative impacts associated with the high volume of recreational usage that these areas are going to attract.

We will continue to work closely with the National Parks and Wildlife Service in the design and ecological assessments of all future walking trails and, where planned in areas within or in close proximity to Natura 2000 sites, that we ensure that they are consistent with the conservation objectives for these designated sites.

Yours sincerely,

Siobhán Gillen
Administrative Officer
Planning Section
Sligo County Council,
City Hall, Quay Street, Sligo
+353-71-9114440
+353-872905263
sgillen@sligococo.ie
sligococo.ie | sligo.ie



Sligo County Council
Comhairle Chontae Shligigh
Sligo.

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,

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 further 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

---

natureconservation <natureconservation@housing.gov.ie>
To: Ann McKirdy <ainenicamhlaidh@gmail.com> Fri, Jul 16, 2021 at 8:47 AM

Hi Ann,

Thank you for your email. I have forwarded it to the District Conservation Officer for that area.

Regards,

Michael.

Michael O'Donnell

Designations Unit

Seirbhís Páirceanna Náisiúnta & Fiadhúlra

National Parks & Wildlife Service

An Roinn Tithíochta, Rialtas Áitiúil agus Oidhreachta

Department of Housing, Local Government and Heritage

90 Sráid an Rí Thuaidh, Baile Átha Cliath 7, D07 N7CV.

90 King Street North, Dublin 7, D07 N7CV

www.gov.ie

[Quoted text hidden]

****
Is faoi rún agus chun úsáide an té nó an aonán atá luaite leis, a sheoltar an ríomhphost seo agus aon comhad atá nasctha leis. Má bhfuair tú an ríomhphost seo trí earráid, déan teagmháil le bhainisteoir an chórais.

Deimhnítear leis an bhfo-nóta seo freisin go bhfuil an teachtaireacht ríomhphoist seo scuabtha le bogearraí frithvíorais chun víorais ríomhaire a aimsiú.

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please notify the system manager.

This footnote also confirms that this email message has been swept by anti-virus software for the presence of computer viruses.
****

Tim Roderick <Tim.Roderick@housing.gov.ie> Fri, Jul 16, 2021 at 10:05 AM
To: "ainenicamhlaidh@gmail.com" <ainenicamhlaidh@gmail.com>
Cc: Miriam Crowley <Miriam.Crowley@housing.gov.ie>

Good morning Anne

Thank you for your e mail.

I note the reply to your initial complaint from Sligo County Council.

With regard to future plans for this area, Sligo County Council are generally, a regulatory body for such developments and a competent authority under the European Communities (Birds and Natural Habitats) Regulations 2011. This means that the provisions of that Directive should be fully implemented including the requirement for screening for Appropriate Assessment. The National Parks and Wildlife Service (NPWS) of the Department of Housing, Local Government and Heritage is available to provide advice in such cases but the ultimate responsibility lies with the Council.

I advise that you contact the local Conservation Ranger for this area, Miriam Crowley on 085 853 5823 to discuss your concerns and clarify what future plans you refer to.

Kind regards, Tim Roderick

Tim Roderick

District Conservation Officer

National Parks and Wildlife Service

Department of Housing, Local Government and Heritage

Ballinafad

Co. Sligo

F52 K752

Tel: 076 100 2512

Mob: 087 6184827

www.npws.ie

From: natureconservation
Sent: Friday 16 July 2021 08:47
To: Tim Roderick <Tim.Roderick@housing.gov.ie>
Subject: FW: SERIOUS CONCERN - URGENT- following the Formal Complaint SAC - Dunes Strandhill and proposal for further paths over the SAC

Hi Tim,

Please see below for your attention and direct reply.

Regards,

Michael.

Michael O'Donnell

Designations Unit

Seirbhís Páirceanna Náisiúnta & Fiadhúlra

National Parks & Wildlife Service

An Roinn Tithíochta, Rialtas Áitiúil agus Oidhreachta

Department of Housing, Local Government and Heritage

90 Sráid an Rí Thuaidh, Baile Átha Cliath 7, D07 N7CV.

90 King Street North, Dublin 7, D07 N7CV

---

www.gov.ie

From: Ann McKirdy [mailto:ainenicamhlaidh@gmail.com]
Sent: Thursday 15 July 2021 17:57
To: natureconservation <natureconservation@housing.gov.ie>

[Quoted text hidden]

[Quoted text hidden]

****
Is faoi rún agus chun úsáide an té nó an aonán atá luaite leis, a sheoltar an ríomhphost seo agus aon comhad atá nasctha leis. Má bhfuair tú an ríomhphost seo trí earráid, déan teagmháil le bhainisteoir an chórais.

[Quoted text hidden]

Fri, Jul 16, 2021 at 7:57 PM

Ann McKirdy <ainenicamhlaidh@gmail.com>
To: Tim Roderick <Tim.Roderick@housing.gov.ie>
Cc: Miriam Crowley <Miriam.Crowley@housing.gov.ie>

Dear Tim,
Thank you very much for your prompt reply. I am very concerned by the lack of concern shown by the Sligo Co. Co for the Special Areas of Conservation and the National Heritage Sites at this location.
Recently an extension of 3 meters was approved by the Sligo Co. Co. Signal Communications felled approximately 100 trees at the site without a felling permit, yet, Sligo Co. Co. response was that no trees were felled on site. They identified the 'site' as the slab where the antennae mast is installed. This is exactly 80 meters from a standing stone neolithic monument in Killaspugbrone.
In 2013 the Sligo Co. Co. did an appropriate assessment in that same area to assess the viability of a community centre, the report said the felling of trees would have an injurious affect on the SAC.
No appropriate assessment was undertaken. I tried unsuccessfully to petition every government agency I could to get an appropriate assessment of this site. They were granted planning permission. Incredibly a condition of planning is that the new mast must have a light at the very top (this is a hugely visually vulnerable area) AND THE CABLE FOR THE ELECTRICITY MUST RUN UNDERGROUND. This is at the site of a neolithic monument. (You can look at this grant for planning in Sligo Co. Co. website, Signal Communications, Killaspugbrone, Sligo) This is a disgrace, this is an archaeological site.

The Killaspugbrone Looped trail current in high usage is completely underwater during high and neap tides. The stone wall to the left of the path which stood for centuries has completely been demolished by walkers walking on the wall to avoid the flooded path (approx 3-4 feet of sea water on this path)

The Sligo Co. Co. is claiming that they did not need an appropriate assessment. This path, the one that floods is ON a SALTMARSH. It is designated as a SAC.

I will send you the FOI's I have received. The Sligo Co. Co mandate for Strandhill would appear to be tourism at all costs.
This is against their legislative mandate to appropriately assess these sites for potential damage.

This is a very serious concern, I will forward the Senior Planner, Frank Moylan's reply to my concern.
Yours sincerely,
Ann McKirdy
[Quoted text hidden]

---

4 attachments

FOI 20_21 Ann McKirdy.docx
2494K

FOI 59_21 Ann McKirdy.docx
2493K

58_21 Ann McKirdy.docx
2493K

FOI 57_21 Ann McKirdy.docx
2493K

Mon, Jan 3, 2022 at 2:25 AM

To: "Tim.Roderick@housing.gov.ie" <Tim.Roderick@housing.gov.ie>

Freedom of Information request - to NPWS

Dear Tim
I am writing under FOI to request a copy of the:

submission by Sligo Co. Co. to NPWS for the proposed trail development is passing through and adjacent to any of the designated SAC's and NHA areas in the development of the Lub Naisiunta Killaspugbrone, Queen Maeve's Cairn and Knocknarea.

I understand the NPWS must be consulted and permission to proceed with the development must be sought. According to
A Guide to Planning and Developing Recreational Trails in Ireland From The National Trails Office , depending on the nature of the proposed trail and the designation of the area concerned, the NPWS may: a. authorise the development of a trail with no conditions, b. authorise the development of a trail with specific conditions or c. prohibit the development of the trail.

I would also like to see your (NPWS) feedback and authorisation of the above mentioned trails and the appropriate assessments for each including the area over the saltwater marsh in Dorrins Strand which floods on high tide.

Many thanks,
[Quoted text hidden]

Tim Roderick (Housing) <Tim.Roderick@housing.gov.ie> Tue, Jan 4, 2022 at 10:45 AM
To: Ann McKirdy <ainenicamhlaidh@gmail.com>
Cc: "Donal McWeeney (Housing)" <Donal.McWeeney@housing.gov.ie>

Good morning Anne

I do not have any of the information you refer to. For clarification, with regard to works potentially affecting Special Areas of Conservation and Special Protection Areas (the natura 2000 network), Sligo County Council are a competent authority as identified in the European Communities (Birds and Natural Habitats) Regulations 2011 and must ensure that any work they carry out, implements the provisions of those Regulations. The National Parks and Wildlife Service does not consent or approve the work of another competent authority.

I would advise that you contact Sligo County Council to establish what procedures they followed in carrying out these works and what formal consultation took place with other bodies.

Subsequent to that, if you wish to make a request to NPWS for information on this matter, please revert to me and I will advise you of the procedure.

Regards, Tim

Tim Roderick

District Conservation Officer

National Parks and Wildlife Service

Department of Housing, Local Government and Heritage

Mobile: 087 618 4827

From: Ann McKirdy <ainenicamhlaidh@gmail.com>
Sent: Monday 3 January 2022 02:26
To: Tim Roderick (Housing) <Tim.Roderick@housing.gov.ie>
Subject: Fwd: SERIOUS CONCERN - URGENT- following the Formal Complaint SAC - Dunes Strandhill and proposal for further paths over the SAC

CAUTION: This eMail originated from outside your organisation and the BTS Managed Desktop service. Do not click on any links or open any attachments unless you recognise the sender or are expecting the email and know that the content is safe. If you are in any doubt, please contact the OGCIO IT Service Desk at help.it@per.gov.ie

[Quoted text hidden]

Ann McKirdy <ainenicamhlaidh@gmail.com> Tue, Jan 4, 2022 at 11:17 PM
To: "Tim Roderick (Housing)" <Tim.Roderick@housing.gov.ie>, minister.ryan@decc.gov.ie
Cc: "Donal McWeeney (Housing)" <Donal.McWeeney@housing.gov.ie>

Thank you Tim.
I will follow up as you suggest, however, I am very upset that the Sligo Co. Co. has refused all my recent FOI requests, their reason for refusal was that I had requested too many items this year. The only communication I have succeeded in getting a response to is through FOI, everything else I send goes into the ether, completely ignored.

I recently reported a number of environmental enforcement issues including the draining of Knocknarea mountain on the Rathcarrick side before Christmas 2021, pneumatic drills on a large digger like machine and at least 200 meters of drain piping approximately 30 cm in diameter and 20 feet long. (This is the mountain where the UNESCO world heritage submission is being evaluated. I expect the outcome will be the usual, 'not an enforcement issue.'

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> Sat, Jan 8, 2022 at 11:29 PM
To: "Info@opr.ie" <info@opr.ie>

21-253-11-OPR
[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> Tue, Jan 11, 2022 at 11:28 PM
To: "Info@opr.ie" <info@opr.ie>

21-253-11-OPR

This is the reply I received some time ago following my formal complaint stating that the consultation with the NPWS noting that an AA was not required, yet this contradicts the Appropriate Assessment carried out in 2013 advising a stage two AA for any proposal over the SAC.

This is not accurate or true.
I have attached photos of the most recent news report on the decimation of the Dunes.
Sincerely,
Ann McKirdy

attached is the facebook for the Strandhill village, the community is outraged, photos, videos and commentary link below.
https://www.facebook.com/groups/241460746585403/?hoisted_section_header_type=recently_seen&multi_permalinks=1018262102238593

---------- Forwarded message ---------
From: **Ann McKirdy** <ainenicamhlaidh@gmail.com>
Date: Thu, Jul 15, 2021 at 5:57 PM
[Quoted text hidden]
[Quoted text hidden]

Ann McKirdy <ainenicamhlaidh@gmail.com> Sun, Mar 15, 2026 at 2:49 PM
To: Ann McKirdy <ainenicamhlaidh@gmail.com>

[Quoted text hidden]

Gmail

Ann McKirdy <ainenicamhlaidh@gmail.com>

RE: WWTP for Strandhill Info Initial Assessment

Licensing Staff <licensing@epa.ie>
To: "ainenicamhlaidh@gmail.com" <ainenicamhlaidh@gmail.com>
Cc: FoI Officer <foi@epa.ie>

Mon, May 12, 2025 at 12:55 PM

Good afternoon Ms McKirdy,

Please find attached the response to your query (that was allocated to be handled outside of the FOI process), thank you for your cooperation.

Kind regards

Peak 2458 pe
2023
remain
1242 pe

Demetra O'Farrell

OES AIE FOI Research Officer

Office of Environmental Sustainability, Wexford

An Oifig um Inbhuanaitheacht Comhshaoil, Loch Garman

epa
Environmental Protection Agency

053 9160600 (Reception)

oesaiefoi@epa.ie

www.epa.ie

2025.05.01_WWET Response_Final.pdf
322K

Reporting Cond' 6.1 of licen

12/05/2025

BY EMAIL: ainenicamhlaidh@gmail.com

Peak 2023 = 2458 pe.

remaining capacity 1242 pe.

RE: WWTP for Strandhill D0107-01.

Dear Ms McKirdy, Pg 4/6 - In 2013 the PE of WWTP 1887 pe and estimated would grow to 1700 pe by 2017

Further to your query received on 31 March 2025, the following sets out the answers in this regard:

1. *How is the calculation for PE for the Waste Water Treatment plant in Strandhill, Sligo calculated?*

   The Glossary of Terms of Wastewater Discharge Licence (WWDL)) Register Number D0107-01 describes population equivalent as:

   A measurement of organic biodegradable load and a population equivalent of 1 (1 p.e.) means the organic biodegradable load having a five-day biochemical oxygen demand (BOD5) of 60g of oxygen per day; the load being calculated on the basis of the maximum average weekly load entering the waste water works during the year, excluding unusual situations such as those due to heavy rain.

   WWDL Register No. D0107-01 can be found at the following link: WWDL Register No. D0107-01

2. *What is the current PE rate?*

   The 2023 Annual Environmental Report (AER) for WWDL Reg. No. D0107-01 states that the Wastewater Treatment Plant (WWTP) was constructed to service 3,700 p.e., that the collected load in the peak week in 2023 was 2,458 p.e. and that the remaining p.e. capacity at the plant is 1,242 p.e.

   The AER for 2024 will be submitted by Uisce Éireann to the EPA and this will be made available on Leap Online at the following link: Licence Profile | LEAP Online

3. *Why has the EPA sanctioned an unlicensed contractor, Wimsey to service this plant?*

   The EPA has not sanctioned any contractors to service the WWTP. The operation and maintenance of the WWTP is the responsibility of the licensee, Uisce Éireann.

   The EPA confirmed to you on the 31/07/2024 that Uisce Éireann had provided the following information on the 26/07/2024:

   "Sludge management at the wastewater treatment plant. Strandhill WwTP is a DBO (Design, Build, Operate) plant, which is operated on behalf of Uisce Éireann by Coffey Water. Coffey Water in turn has a commercial agreement in place with a contractor engaged for the purposes of sludge movements out of the Strandhill Plant. All sludge generated at the Strandhill WWTP is transported to the Sligo Sludge Hub Centre for treatment."

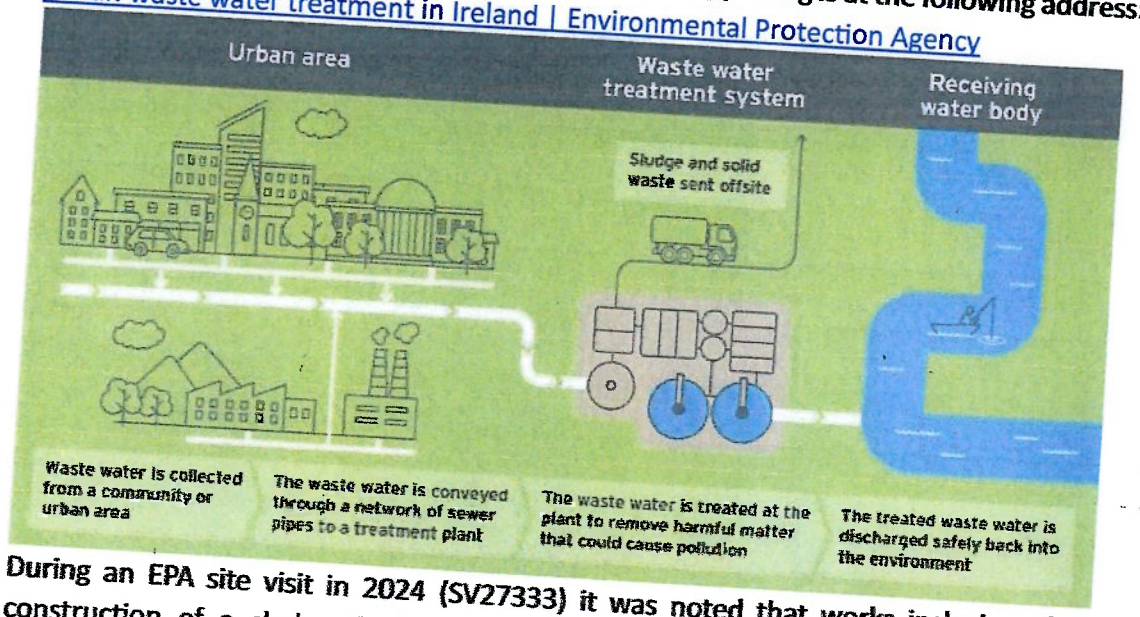
   Please contact Uisce Éireann with regard to any data sought regarding contractors that may operate at the works.

4. *Is the EPA aware that there are two truckloads of sludge/waste removed weekly?*

12/05/2025

BY EMAIL: ainenicamhlaidh@gmail.com

Uisce Éireann report on the sludge accepted at any plant as part of their AER. Uisce Éireann can remove sludge as part of the operation process to ensure excess sludge is removed from the treatment system. Please note the "Sludge and solid waste sent off-site" in the diagram below. Link to the diagram and supporting is at the following address: Urban waste water treatment in Ireland | Environmental Protection Agency



During an EPA site visit in 2024 (SV27333) it was noted that works inclusive of the construction of a sludge thickening facility were completed (Site Visit Report No. SV27333).

5. *Is this normal standard operating procedure for the efficient disposal of waste?*

Sludge removal is part of the operation of a WWTP. Please refer to the above flow chart. If sludge was not removed from a WWTP the system would contain excess sludge and the treatment process would be compromised. The volume and frequency of sludge removal varies at each plant as it is dependent on the inputs into the treatment system and the type of WWTP.

6. *What is the risk to human life of the high levels of Ammonia in the waste disposed to sea?*

Schedule A of the WWDL (WWDL Register No. D0107-01) states that the discharge from the WWTP shall be below the Ammonia Emission Limit Value (ELV) of 0.85mg/l (as N).

- The 2023 AER states that out of 13 wastewater discharge samples were tested in 2023 and 2/13 samples failed the ELV for Ammonia. The annual mean of Ammonia of the 13 samples tested was reported as 0.410mg/l (as N).
- The 2023 AER states that two ambient Strandhill coastal samples taken in July and November 2023 resulted in Ammonia levels of 0.44mg/l and 0.51mg/l respectively.
- The European Communities Environmental Objectives (Surface Waters) Regulations 2009, as amended, does not provide a limit on the nutrient conditions relating to Total Ammonia (mg N/l) for coastal or transitional waters.

12/05/2025

BY EMAIL: ainenicamhlaidh@gmail.com

Condition 6.1 of licence Reporting

7. *Trace metals and chemicals, what are the pollutants which are dangerous to human health that are currently being monitored at this WWTP and in the waters around this plant?*

Condition 4.19 Priority Substances and Schedule B: Ambient Monitoring of the WWDL (WWDL Register No. D0107-01) describes the parameters that are required to be tested in the receiving waterbody, Sligo Bay.

required to take samples

8. *Who is the contractor monitoring this?*

Uisce Éireann are required to take samples in accordance with the licence and report on the results of these samples as part of the AER they submit annually. Where any exceedances of the ELV occur Uisce Éireann submit incidents to the EPA. Both AERs and Incidents are available online using the Leap Online portal: Licence Profile | LEAP Online

9. *At what point will the public be informed of the dangerous levels of toxins?*

All monitoring data required by the WWDL is reported to the EPA as part of the AER submitted annually by Uisce Éireann. All AERs submitted by Uisce Éireann are available to the public online using the LEAP Online portal.

Report incidents

Where an incident has occurred due to the breach of an ELV, Uisce Éireann are required to follow Condition 6.1 of their licence and report this incident to the EPA. These incidents are also available to the public via the Leap Online portal. Condition 6.1 requires Uisce Éireann to report incidents to other state bodies are also required to be notified inclusive of the Department of Agriculture, Food and the Marine, the Martine Institute, the Sea Fisheries Protection Authority, the Food Safety Authority of Ireland and an Bord Iascaigh Mhara.

10. *How is the results recorded, reported and monitored?*

As described above, results are reported via Uisce Éireann's submission of AERs which are available on LEAP Online and via incident reports where exceedances have occurred, also available on LEAP Online.

11. *How is the designation of SAC around the WWTP and the receiving sea water at Killaspugbrone impact the assessment of PE?*
12. *There was no Whorl Snail Assessment done on the SAC site in spite of the fact that this was clearly outlined, please explain how this was sanctioned without an Environmental Assessment?*

Response to Queries 11 and 12:

receiving waters

The p.e. relates to the of organic biodegradable load being collected and routed to the WWTP for treatment. The ELVs set out in Schedule A of the WWDL take into consideration the p.e. and the nature of the load during the application assessment process. The ELVs are put in place to project the receiving waters and any associated sensitive areas. Compliance with EU Directives is discussed as part of the Inspector's Report that accompanied the recommended licence. Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC,

Shellfish & Bathing Exceeded.

inclusive of the narrow-mouthed Whorl Snail, and Cummeen Strand SPA formed part of this assessment.

13. How is the tourism influence, daily visitors and overnight visitors factored in?
14. How is the most popular surfing site, 'Bluerock' 100 m from the new WWTP factored in?
15. How are the Shellfish Waters, for the Coney Island Shellfish farm 200m from the facility factored in?
16. Surfer visitors at the National Surf Centre particularly those from the four surf schools in Strandhill getting lessons at the seafront and directly in front of the WWTP (less than 100m) factored in?
17. The hugely popular Killaspugbrone Looped trail is bringing in excess of 500,000 visitors per year to Strandhill across the sensitive SAC and Salt-marshes, how are these visitor numbers factored or considered?
18. The Sligo Strandhill Golf club visitors, how are these visitors factored in? I'm excess of 70,000 visitors per year?
19. The very popular Strandhill Sunday Market at the Airport in Strandhill brings in excess of 200,000 visitors to the village each year, how are these visitors considered?
20. The Strandhill Caravan park caters for in excess of 100 caravans and approximately 50 tents, how are these seasonal visitors factored into the WWTP treatment capacity?
21. The Warriors Run Brings 50,000 +visitors to Strandhill in August each year, how is this catered for?
22. The hotels, B&B, Air B&B, hostels (these hostels are permanently housing Ukrainian refugee families).
23. Sports, The Sligo Rugby Club and the soccer at Strand Celtic bring thousands of athletes and visitors to Strandhill, how are these catered for?
24. The new twice hourly bus service from Sligo to Strandhill brings thousands of day trip visitors, how are these factored into the WWTP capacity?
25. Sligo Airport rescue facility brings approximately a hundred visitors; employees, students and visitors daily to the village.
26. Pubs and Restaurants; how do the many visitors to these establishments get factored into the WWTP capacity?
27. Church goers, there are two churches in the village, both are full to capacity for Sunday service, how are these visitors catered for?
28. The school, St Patrick's NS, has an enrolment of over 230+ students and 30 staff, how is this factored in?

Contradiction

GROW? ?

<u>Response to Queries 13 – 27:</u>

The population equivalent of the Strandhill agglomeration was considered as part of the WWDL application process prior to the granting of a licence. In 2013, the population equivalent of the agglomeration was estimated as 1,887p.e. and it was estimated this would grow to 1,700p.e. by 2017. This is described in the Inspector's Report relating to the application for a wastewater discharge licence for the Strandhill agglomeration (Inspector's Report).

2013 = 1887 pe

12/05/2025

BY EMAIL: ainenicamhlaidh@gmail.com

Uisce Éireann report on the remaining p.e. capacity of the works annually and the 2023 AER for WWDL Reg. No. D0107-01 states that the WWTP was constructed to service 3,700 p.e., that the collected load in the peak week in 2023 was 2,458 p.e. and that the remaining p.e. capacity at the plant is 1,242 p.e. The data provided by Uisce Eireann confirms that the plant has remaining p.e. capacity.

Condition 1.7 of the licence requires Uisce Éireann to monitor the remaining treatment capacity at the WWTP and where the capacity will be exceeded with the ensuing three-year period, Uisce Éireann shall seek a licence review from the EPA.

29. *The new plant exceeds the footprint mandated, what approval has this received given the existing habitat of Whorl Snail as clearly stated in the Engineers Report?*
30. *How has this plant been permitted to proceed when the part 8 was undertaken in 2008 and all of the residential and visitor data was outdated and irrelevant by that time?*
31. *The new Development Plan proper sea that there is capacity for in excess of 1200 PE, please advise how is the capacity possible?*

Response to Queries 29 and 31:

The WWDL authorises the discharge of wastewater from the wastewater works servicing the Strandhill agglomeration. You should contact the Planning Authority with regard to any concerns you may have the Sligo County Development Plan 2024 – 2030 and regarding Uisce Éireann's adherence to the conditions of any permission granted for the development of the wastewater works (Making a Complaint).

32. *The noxious odour at Killaspugbrone point where the pipe dumps to sea has been reported by myself on numerous occasions, has this been investigated?*
33. *What is the outcome of the investigation?*

Response to Queries 32 and 33:

The EPA provided responses to Complaint Ref. No. COM019342 on the 31/07/2024 and 20/08/2024 inclusive of a response from Uisce Éireann. Uisce Éireann did not detect odour issues at the plant or the network.

The WWDL requires that a grab sample from the primary discharge monitoring location is taken daily and a sample from Sligo Bay is taken weekly to provide for a visual inspection and part of this inspection includes an examination of odour. Should it be the case that odour is a concern Uisce Éireann should be contacted in the first instance. It may be the case that Uisce Éireann can report on the results of these examinations and whether odour has been noted on the network or plant at the time of the complaint.

If the response from Uisce Éireann is not to your satisfaction and the issue of odour remains the EPA should be contacted (inclusive of the Reference Number of the Uisce Éireann compliant, if possible).

34. *Can the EPA safeguard the health of the recreational users of the sea in Strandhill and the consumers of the oysters farmed here?*

12/05/2025

BY EMAIL: ainenicamhlaidh@gmail.com

Uisce Éireann are required to notify the Sea-Fisheries Protection Authority (SFPA) of any incident that could impact Sligo Bay Shellfish Area. The SFPA have classified the beds in this shellfish area as Class B (Shellfish Classified Areas | Sea Fisheries Protection Authority). The SFPA is the competent authority for the regulation of the seafood sector including aquaculture and oversees the implementation and compliance with food safety legislation. The SFPA also carries out a monthly shellfish sampling programme in all active shellfish production areas with the results determining the classification of each area for the sale or consumption of shellfish (Shellfish Safety | Sea Fisheries Safety Authority).

Details on bathing water quality are on Beaches.ie

35. *What concern does the EPA have for the proposal to increase residential settlement by 1200 for this WWTP?*

As highlighted in the response to queries numbers 13-27 above, Uisce Éireann have reported that the remaining p.e. capacity at the plant is 1,242 p.e.
Condition 1.7 of the licence requires Uisce Éireann to monitor the remaining treatment capacity at the WWTP and where the capacity will be exceeded with the ensuing three-year period, Uisce Éireann shall seek a licence review from the EPA.

I trust this is to your satisfaction.

Yours sincerely

Kathleen Byrne

Water, Energy and Business Support Programme
Office of Environmental Sustainability, Wexford
Foireann Tacaíochta Gnó & Measúnaithe Comhshaoil
An Clár Tacaíochta maidir le hUisce, Fuinneamh agus Gnó
An Oifig um Inbhuanaitheacht Comhshaoil, Loch Garman

Environmental Protection Agency

053 9160600 (Reception)

www.epa.ie

12/05/2025

BY EMAIL: ainenicamhlaidh@gmail.com

Waste Water Calculations →

Uisce Éireann
Irish Water

Our Ref: FOIR1745

Date: 16 May 2024

Ann McKirdy

ainenicamhlaidh@gmail.com

! No incidents! shocking lies

Uisce Éireann
Teach Colvill
24-26 Sráid Thalbóid
Baile Átha Cliath 1
D01 NP86
Éire

Uisce Éireann
Colvill House
24-26 Talbot Street
Dublin 1
D01 NP86
Ireland

T: +353 1 89 25000
F: +353 1 89 25001
www.water.ie

Dear Ms. McKirdy,

I refer to the request which you made under the Freedom of Information Act 2014 (the "**FOI Act**") for records held by Uisce Éireann.

The records you requested are:

- "*The Tankered Wastewater Agreement and Sludge Management Agreement with Irish Water and Wimsey Plant Hire (License No NWCPO-16-11816-01 for disposal of waste and removal of sludge in Strandhill WwTP, i.e. volume and frequency.*
- *Any information on the assessment for the population equivalent (PE) value for the new Wastewater Treatment Plant in Strandhill.*
- *Any EPA/Uisce Éireann notifications to Sligo Co. Council of sewage pollution or concern for performance from the Wastewater Treatment Plant in Strandhill.*
- *The Environmental Assessment report on Whorl Snails completed by Dr. Don Cotton, CREDCO on the SAC WWTW, Wastewater Treatment Works.*
- ➢ This is referred to on page 6 of the June 2007 Report from Nicholas O'Dwyer Ltd which is contained within the 2013 Appropriate Assessment Report for the Tubbercurry, Grange, Strandhill Wastewater Treatment plants".

I made a final decision to grant your request on 16 May 2024. If you have any queries regarding this correspondence you can contact me by email at foi@water.ie

I will address each part of your request below:

- *The Tankered Wastewater Agreement and Sludge Management Agreement with Irish Water and Wimsey Plant Hire (License No NWCPO-16-11816-01 for disposal of waste and removal of sludge in Strandhill WwTP, i.e. volume and frequency.*

Stiúrthóirí / Directors: Tony Keohane (Cathaoirleach / Chairman), Niall Gleeson (POF / CEO), Christopher Banks, Gerard Britchfield, Liz Joyce, Michael Nolan, Patricia King, Eileen Maher, Cathy Mannion, Michael Walsh.
Oifig Chláraithe / Registered Office: Teach Colvill, 24-26 Sráid Thalbóid, Baile Átha Cliath 1, D01 NP86 / Colvill House, 24-26 Talbot Street, Dublin, Ireland D01NP86
Is cuideachta ghníomhaíochta ainmnithe atá faoi theorainn scaireanna é Uisce Éireann / Uisce Éireann is a designated activity company, limited by shares.
Clárúithe in Éirinn Uimh.: 530363 / **Registered in Ireland No.:** 530363.

Uisce Eireann
No Report Sewage
Pollution
Incidents
NOT TELLÉ
14/10/22 Dorrans
Strand

The FOI decision-maker processing this part of your request has advised that Strandhill Wastewater Treatment Plant (WwTP) is a DBO (Design, Build, Operate) plant, which is operated on behalf of Uisce Éireann by Coffey Water (Coffey Water in turn has a commercial agreement in place with Wimsey Plant Hire). In your query you specifically request details of volume and frequency, and the decision-maker has returned the table below containing the relevant information of total sludge movement and quantities from Strandhill WwTP (Wimsey Plant Hire is the only subcontractor engaged for the purposes of sludge movements out of the Strandhill Plant). I have been advised that the DBO operations commenced in 2019 and the data includes data from 2019 to end of March 2024.

Year	No Moves	Volume (as Dry T)	Volume (as wet T)
2019	191	14,792	1,649,980
2020	183	34,760	1,946,260
2021	129	35,422	2,208,220
2022	113	33,296	1,943,940
2023	84	21,081	1,522,720
2024 (Jan-Mar)	24	8,804	430,380
Total 2019- 2024)	**724**	**148,155**	**9,701,500**

- *Any information on the assessment for the population equivalent (PE) value for the new Wastewater Treatment Plant in Strandhill.*

The population assessment for the design of the upgrade to Strandhill Wastewater Treatment Plant (WwTP) was undertaken in 2016. The table below provides a breakdown of the current load at the time and the 10-year design capacity for the upgraded plant.

Item	Description	Load (PE)
Current (2016) Load (PE)		
Domestic	Current domestic p.e. calculated using 2014 geodirectory data – houses within drainage boundary, 2.7 PE per house	2,109
	34 house development under construction (pl. ref. 06/1317)	92
Commercial	Allowance for Non Domestic contribution; generally a figure of 16% of domestic is applied as per the Urban Wastewater Study. 30% allowed for to reflect busy tourist season. There are no industrial discharges in Strandhill	660
Institutional	Primary School in village; ~250 pupils/staff at 0.3PE per pupil/staff. Note that this figure is conservative as pupils / staff may be living in the agglomeration and included in the above domestic figures	80
Total Current (2016) Load (PE)		**2,941**
Future (10 year) Load (PE)		
10 year growth	Strandhill had a 2011 CSO pop of 1,596. ESRI growth rates for Co. Sligo (10 year horizon): - 0.02%pa for villages/towns > 1,500 pop - 0.225%pa for villages/towns < 1,500 pop. Conservative approach taken of 0.5%pa to reflect potential for increased housing demand (5.3% over 10 years)	156
Headroom	15% headroom allowance (Sligo is a gateway town under the NSS - Strandhill is <10km to Sligo centre and is both a commuter and tourism hub)	464
Total Future (10 year) Load (PE)		**3,561**
Rounded		**3,700**

Note that the current connected load is calculated as 2,401PE; this is reported in the Wastewater Capacity Register for 2022.

- *Any EPA/Uisce Éireann notifications to Sligo Co. Council of sewage pollution or concern for performance from the Wastewater Treatment Plant in Strandhill.*

I have been advised by the decision-maker processing this part of your request that there have been no reported sewage pollution incidents relating to the performance of the Strandhill WwTP during the period 2015 to date. In accordance with the Wastewater Discharge Licence (WWDL) attached are 11 No. incident reports notified to the Environmental Protection Agency (EPA) regarding exceedances of the discharges, vis a vis the Emission Limit Values (ELV) set in the WWDL, none of which were assessed as impacting on the receiving waters.

A licence review application is required to remove the Ammonia and Total Oxidised Nitrogen ELV's and replace with a DIN limit which is more appropriate and in line with applicable legislation for the discharge. A marine model is required to confirm the appropriate DIN limit; this model is currently underway and will take a number of years to complete. On completion a licence review application will be submitted to the EPA.

- *The Environmental Assessment report on Whorl Snails completed by Dr. Don Cotton, CREDCO on the SAC WWTW, Wastewater Treatment Works.*
- ➢ This is referred to on page 6 of the June 2007 Report from Nicholas O'Dwyer Ltd which is contained within the 2013 Appropriate Assessment Report for the Tubbercurry, Grange, Strandhill Wastewater Treatment plants".

I have been advised by the decision-maker processing this part of your request that the record requested pre-dates the establishment of Uisce Éireann. I have discussed this part of your request with the FOI Officer in Sligo Co. Council, which may hold the requested record in this instance.

RIGHT OF APPEAL
You may appeal this decision. In the event that you decide to make such an appeal, you can do so by writing to the Freedom of Information Unit, Uisce Éireann, Colvill House, 24-26 Talbot St., Dublin 1 enclosing the appropriate fee of €30. Payment should be made by way of bank draft, money order, postal order or cheque made payable to Uisce Éireann (FOI). You should make your appeal within 4 weeks from the date of this notification however the making of a late appeal may be permitted in exceptional circumstances. The appeal will involve a complete reconsideration of the matter by a more senior member of the staff of Uisce Éireann.

Yours sincerely,

Noel Shannon
Freedom of Information Officer

Uisce Éireann

14 October 2022

Sewage in Sea
do not swim
notice

Dorrins Strand
Strandhill




14th Oct 2022
DOONEENS STRAND
SLIGO COUNTY COUNCIL
sligo.ie
WARNING
Water Quality Poor
ACTIONS TAKEN/PROPOSED:


WARNING
DO NOT ENTER

AIE June 24
Uisce Éireann

Our Ref: AIER189

Date: 12 June 2024

Ann McKirdy

ainenicmhlaidh@gmail.com

Uisce Éireann
Teach Colvill
24-26 Sráid Thalbóid
Baile Átha Cliath 1
D01 NP86
Éire

Uisce Éireann
Colvill House
24-26 Talbot Street
Dublin 1
D01 NP86
Ireland

T: +353 1 89 25000
F: +353 1 89 25001
www.water.ie

Dear Ms. McKirdy,

I refer to your request dated 10 May 2024 and received by Uisce Éireann on 10 May 2024 under EU Directive 2003/4/EC (the **"Directive"**) (as transposed by the European Communities (Access to Information on the Environment) Regulations 2007–2018 (the **"Regulations"**) for the following information relating to the new upgraded Wastewater Treatment Plant (WwTP) in Strandhill Sligo.

- *Average daily volume of waste in cubic litres processed by the Strandhill WwTP per Month.*
- *The technical report carried out by Irish Water which determined the capacity for the Strandhill WwTP and the parameters taken into account for the measurement of the PE for this plant?*
- *Did Irish Water take into account the fluctuating volume of tourists visiting Strandhill Village? If so, what estimation was used? How many visitors per month during the peak holiday season?*
- *Did Irish Water take into consideration the seasonal increase in residents based on the number of people resident seasonally in the caravan park?*
- *What about factors such as the Warriors Run? The Air Show? The Vintage Car Show? The Strandhill People's Market? Were these visitor numbers factored in and if so, I am requesting the release of these visitor numbers used in forecasting the PE?*
- *Information on the Storm Water Storage System. Did Irish Water upgrade the Storm Water system?*
- *Also, did Irish Water Decommission the old storm water system?*
- *What happens to the overflow tank (which was not decommissioned and is presently filled with green water within the site of the WwTP) when it rains? Where does the over flow of this water go?*
- *How is this water released?*
- *Is it treated before release or simply released into the sea via a drain.*
- *How many litres of Waste Water that the new treatment plant receives from the Pumping Station in the Caravan Park.*
- *Information on how this water is treated.*
- *Information to confirm whether there is an outflow or a junction box close to the end of the Airport Runway at Killaspugbrone.*

Following consideration of the provisions of the AIE Regulations, Uisce Éireann has reached a decision to grant your request on 12 June 2024.

I have been advised that there is some repetition between this AIE request and the FOI request (Ref: FOIR1745) which Uisce Éireann responded to on 16 May 2024. As part of this response, I propose to provide information that has not previously been provided to you.
I will address each part of your request below:

- *Average daily volume of waste in cubic litres processed by the Strandhill WwTP per Month.*

The decision-maker processing your AIE request has returned most up-to-date inflow data as held by Uisce Éireann from 2023:

Month	Average Inflow (m3/d)
Jan	1,238
Feb	722
Mar	556
Apr	630
May	538
Jun	417
Jul	591
Aug	508
Sep	508
Oct	641
Nov	1,143
Dec	1,038
Annual Average	**710**

- *The technical report carried out by Irish Water which determined the capacity for the Strandhill WwTP and the parameters taken into account for the measurement of the PE for this plant?*

I have been advised that details of the assessment completed to determine the capacity of the recently upgraded wastewater treatment plant at Strandhill were provided in response your FOI request (Ref: FOIR1745) dated 16 May 2024.

- *Did Irish Water take into account the fluctuating volume of tourists visiting Strandhill Village? If so, what estimation was used? How many visitors per month during the peak holiday season?*

I have been advised that this information was provided in response to FOIR1745 as issued on 16 May 2024.

- *Did Irish Water take into consideration the seasonal increase in residents based on the number of people resident seasonally in the caravan park?*

I have been advised that this information was provided in response to FOIR1745 as issued on 16 May 2024.

- *What about factors such as the Warriors Run? The Air Show? The Vintage Car Show? The Strandhill People's Market? Were these visitor numbers factored in and if so, I am requesting the release of these visitor numbers used in forecasting the PE?*

I have been advised that this information was provided in response to FOIR1745 as issued on 16 May 2024.

- *Information on the Storm Water Storage System. Did Irish Water upgrade the Storm Water system?*

I have been advised that the only element associated with surface water collection or storm stage constructed was a Stormwater storage tank installed on site with a volume of 489m3. The purpose of this is to reduce the number and duration of storm water overflows from the treatment plant.

There were no foul or combined sewers upgraded or installed as part of the Strandhill WwTP Upgrade Project.

Where there are separate surface water collection systems these fall under the responsibility of the Sligo County Council Roads Section (Sligo Co. Council is the competent authority with responsibility for the stormwater network).

- *Also, did Irish Water Decommission the old storm water system?*

The decision-maker has advised that there were no foul or combined sewers decommissioned as part of the Strandhill WwTP Upgrade Project.

Where there are separate surface water collection systems these fall under the responsibility of the Sligo County Council Roads Section.

- *What happens to the overflow tank (which was not decommissioned and is presently filled with green water within the site of the WwTP) when it rains? Where does the over flow of this water go?*

The decision-maker has advised that as part of the WwTP upgrade the original aeration and settlement tanks were cleaned out and are now isolated from the newly upgraded treatment process. As such these tanks fill with rainwater. The tanks are isolated from the discharge so there is no overflow in place. The contents are pumped to the live treatment process for treatment and discharge periodically when conditions allow.

I have been advised further that these tanks may be brought back into operation in time should additional treatment capacity be required.

- *How is this water released?*

Refer to the response above.

- *Is it treated before release or simply released into the sea via a drain.*

Refer to the response above.

- *How many litres of wastewater that the new treatment plant receives from the Pumping Station in the Caravan Park.*

In relation to the Caravan Park Pumping Station (PS), I have been advised that this PS serves both the Caravan Park and a number of properties on the promenade and Main Street. I have been advised further that Uisce Éireann does not hold have a dataset for flow from this PS.

- *Information on how this water is treated.*

The decision-maker has advised that wastewater from the Caravan Park Pumping Station is pumped to the collection network, where it flows to the Strandhill Wastewater Treatment Plant (WwTP) for treatment.

- *Information to confirm whether there is an outflow or a junction box close to the end of the Airport Runway at Killaspugbrone.*

MUCH 

The decision-maker has advised that treated effluent is discharged from the Strandhill WwTP to the sea at a location some 300m from the shore line.

CLOSER

Review

Under Article 11 of the Regulations, you have a right to seek an internal review of our decision. An internal review must be requested within one month of receipt of our decision. There is no charge for requesting an internal review. If you would like to seek an internal review, you can do so by sending an email to foi@water.ie

Yours sincerely,

inspected on low tide

Noel Shannon
AIE Officer

Uisce Éireann

Gmail

Ann McKirdy <ainenicamhlaidh@gmail.com>

RE: WWTP for Strandhill Info Initial Assessment

OESAIEFOI <OESAIEFOI@epa.ie> Fri, May 16, 2025 at 9:06 AM
To: Ann McKirdy <ainenicamhlaidh@gmail.com>, Licensing Staff <licensing@epa.ie>
Cc: OESAIEFOI <OESAIEFOI@epa.ie>

Dear Ms McKirdy

With regard to your further query raised below, I hope the following clarifies this matter for you:

"The correspondence that issued contained a reference to the Inspectors Report (IR) associated with the 2013 licence application. The pe is discussed in the IR and for fullness the relevant extract is attached here:

The village of Strandhill is located on the northern coast of County Sligo, approximately 8 km west of Sligo town. The town has historically benefitted from its coastal position in terms of tourism revenue and in recent times has attracted a lot of additional tourism with the rise in popularity of surfing and other watersports. Due to its proximity to Sligo town and its designation as a Key Satellite Village in the Sligo County Development Plan 2005 - 2011, the village of Strandhill has grown in population in recent years, with an existing population equivalent of 1,887 p.e. at the time the application was submitted. In the draft Sligo County Development Plan 2011 - 2017, Strandhill is designated as a Principal Gateway Satellite with a recommended population level of 1,700 persons by 2017.

WWTP Conflicting Capacity

Kind regards

Kathleen Byrne

Business Support & Environmental Assessment Team

Water, Energy and Business Support Programme

Office of Environmental Sustainability, Wexford

Foireann Tacaíochta Gnó & Measúnaithe Comhshaoil

An Clár Tacaíochta maidir le hUisce, Fuinneamh agus Gnó

An Oifig um Inbhuanaitheacht Comhshaoil, Loch Garman

Environmental Protection Agency

053 9160600 (Reception)

www.epa.ie

WWTP Conflicting Capacity



[Quoted text hidden]

Gmail

Ann McKirdy <ainenicamhlaidh@gmail.com>

Overflowing Sewage at WWTP Reported attached

23-153-12
1 message

OPR Info <info@opr.ie>
To: Ann McKirdy <ainenicamhlaidh@gmail.com>

Mon, May 26, 2025 at 12:02 PM

23-153-12-OPR

Dear Ms McKirdy,

The Office of the Planning Regulator (OPR) acknowledges receipt of your correspondence dated 25th May 2025.

Your correspondence is under consideration and a reply will issue in due course.

Kindest regards,

Sarah

Sarah Leonard

Reviews and Examinations

Oifig an Rialaitheora Pleanála

Office of the Planning Regulator

Teach na Páirce, 191-193A An Cuarbhóthar Thuaidh, Baile Átha Cliath 7, D07 EWV4

Park House, Grangegorman, 191-193A North Circular Road, Dublin 7, D07 EWV4

T +353 (0)1 854 6700

www.opr.ie

WWTP May 25
Formal Complaints EPA
Overflowing Sewage May 25

From: Ann McKirdy <ainenicamhlaidh@gmail.com>
Sent: Sunday 25 May 2025 17:12
To: OESAIEFOI <OESAIEFOI@epa.ie>; Bathing Water <bathingwater@sligococo.ie>; Planning Emails <planning@sligococo.ie>; Development Planning Unit Sligo County Council <dpu@sligococo.ie>; planning@irishwater.ie; OPR Info <info@opr.ie>; FOI <FOI@water.ie>; info@water.ie
Cc: Licensing Staff <licensing@epa.ie>
Subject: Formal complaint - environment - WWTP- Wastewater plant spillage overflow Stramdhill

May 25th 2025

CAUTION: This eMail originated from outside your organisation and the BTS Managed Desktop service. Do not click on any links or open any attachments unless you recognise the sender or are expecting the email and know that the content is safe. If you are in any doubt, please contact the OGCIO IT Service Desk.

To whom it may concern,

This is an official report to alert you to the fact that the Waste water plant in Strandhill Sligo is overflowing and there is a ferociously suffocating smell in the Strandhill area. Currently there is a hazmat response team at the plant, Wimsey contractor is present also (25/5/2025).

This is another loud alarm bell raising serious concerns for significant deficits at this plant to treat the current load. This spillage poses a risk to human health and the environment. I have been reporting my concerns and documenting this for years.

The projected head room at this plant is seriously overstated. The WWTP is at capacity. This is a major incident. There is human excrement and waste spillage all over the road and the area.

I look forward to the formal response from the EPA, Uisce Eireann, the OPR and Sligo County Council, all of whom are addressed herein.

Yours sincerely,

Ann McKirdy

14 October 2022

Sewage in Sea
do not swim
notice

Dorrins Strand
Strandhill




14th Oct 2022
DOONEENS STRAND
SLIGO COUNTY COUNCIL
sligo.ie
WARNING
Water Quality Poor
ACTIONS TAKEN/PROPOSED:


WARNING
DO NOT ENTER

AIE June 24
Uisce Éireann

Our Ref: AIER189

Date: 12 June 2024

Ann McKirdy

ainenicmhlaidh@gmail.com

Uisce Éireann
Teach Colvill
24-26 Sráid Thalbóid
Baile Átha Cliath 1
D01 NP86
Éire

Uisce Éireann
Colvill House
24-26 Talbot Street
Dublin 1
D01 NP86
Ireland

T: +353 1 89 25000
F: +353 1 89 25001
www.water.ie

Dear Ms. McKirdy,

I refer to your request dated 10 May 2024 and received by Uisce Éireann on 10 May 2024 under EU Directive 2003/4/EC (the **"Directive"**) (as transposed by the European Communities (Access to Information on the Environment) Regulations 2007–2018 (the **"Regulations"**) for the following information relating to the new upgraded Wastewater Treatment Plant (WwTP) in Strandhill Sligo.

- *Average daily volume of waste in cubic litres processed by the Strandhill WwTP per Month.*
- *The technical report carried out by Irish Water which determined the capacity for the Strandhill WwTP and the parameters taken into account for the measurement of the PE for this plant?*
- *Did Irish Water take into account the fluctuating volume of tourists visiting Strandhill Village? If so, what estimation was used? How many visitors per month during the peak holiday season?*
- *Did Irish Water take into consideration the seasonal increase in residents based on the number of people resident seasonally in the caravan park?*
- *What about factors such as the Warriors Run? The Air Show? The Vintage Car Show? The Strandhill People's Market? Were these visitor numbers factored in and if so, I am requesting the release of these visitor numbers used in forecasting the PE?*
- *Information on the Storm Water Storage System. Did Irish Water upgrade the Storm Water system?*
- *Also, did Irish Water Decommission the old storm water system?*
- *What happens to the overflow tank (which was not decommissioned and is presently filled with green water within the site of the WwTP) when it rains? Where does the over flow of this water go?*
- *How is this water released?*
- *Is it treated before release or simply released into the sea via a drain.*
- *How many litres of Waste Water that the new treatment plant receives from the Pumping Station in the Caravan Park.*
- *Information on how this water is treated.*
- *Information to confirm whether there is an outflow or a junction box close to the end of the Airport Runway at Killaspugbrone.*

Following consideration of the provisions of the AIE Regulations, Uisce Éireann has reached a decision to grant your request on 12 June 2024.

I have been advised that there is some repetition between this AIE request and the FOI request (Ref: FOIR1745) which Uisce Éireann responded to on 16 May 2024. As part of this response, I propose to provide information that has not previously been provided to you.
I will address each part of your request below:

- *Average daily volume of waste in cubic litres processed by the Strandhill WwTP per Month.*

The decision-maker processing your AIE request has returned most up-to-date inflow data as held by Uisce Éireann from 2023:

Month	Average Inflow (m3/d)
Jan	1,238
Feb	722
Mar	556
Apr	630
May	538
Jun	417
Jul	591
Aug	508
Sep	508
Oct	641
Nov	1,143
Dec	1,038
Annual Average	**710**

- *The technical report carried out by Irish Water which determined the capacity for the Strandhill WwTP and the parameters taken into account for the measurement of the PE for this plant?*

I have been advised that details of the assessment completed to determine the capacity of the recently upgraded wastewater treatment plant at Strandhill were provided in response your FOI request (Ref: FOIR1745) dated 16 May 2024.

- *Did Irish Water take into account the fluctuating volume of tourists visiting Strandhill Village? If so, what estimation was used? How many visitors per month during the peak holiday season?*

I have been advised that this information was provided in response to FOIR1745 as issued on 16 May 2024.

- *Did Irish Water take into consideration the seasonal increase in residents based on the number of people resident seasonally in the caravan park?*

I have been advised that this information was provided in response to FOIR1745 as issued on 16 May 2024.

- *What about factors such as the Warriors Run? The Air Show? The Vintage Car Show? The Strandhill People's Market? Were these visitor numbers factored in and if so, I am requesting the release of these visitor numbers used in forecasting the PE?*

I have been advised that this information was provided in response to FOIR1745 as issued on 16 May 2024.

- *Information on the Storm Water Storage System. Did Irish Water upgrade the Storm Water system?*

I have been advised that the only element associated with surface water collection or storm stage constructed was a Stormwater storage tank installed on site with a volume of 489m3. The purpose of this is to reduce the number and duration of storm water overflows from the treatment plant.

There were no foul or combined sewers upgraded or installed as part of the Strandhill WwTP Upgrade Project.

Where there are separate surface water collection systems these fall under the responsibility of the Sligo County Council Roads Section (Sligo Co. Council is the competent authority with responsibility for the stormwater network).

- *Also, did Irish Water Decommission the old storm water system?*

The decision-maker has advised that there were no foul or combined sewers decommissioned as part of the Strandhill WwTP Upgrade Project.

Where there are separate surface water collection systems these fall under the responsibility of the Sligo County Council Roads Section.

- *What happens to the overflow tank (which was not decommissioned and is presently filled with green water within the site of the WwTP) when it rains? Where does the over flow of this water go?*

The decision-maker has advised that as part of the WwTP upgrade the original aeration and settlement tanks were cleaned out and are now isolated from the newly upgraded treatment process. As such these tanks fill with rainwater. The tanks are isolated from the discharge so there is no overflow in place. The contents are pumped to the live treatment process for treatment and discharge periodically when conditions allow.

I have been advised further that these tanks may be brought back into operation in time should additional treatment capacity be required.

- *How is this water released?*

Refer to the response above.

- *Is it treated before release or simply released into the sea via a drain.*

Refer to the response above.

- *How many litres of wastewater that the new treatment plant receives from the Pumping Station in the Caravan Park.*

In relation to the Caravan Park Pumping Station (PS), I have been advised that this PS serves both the Caravan Park and a number of properties on the promenade and Main Street. I have been advised further that Uisce Éireann does not hold have a dataset for flow from this PS.

- *Information on how this water is treated.*

The decision-maker has advised that wastewater from the Caravan Park Pumping Station is pumped to the collection network, where it flows to the Strandhill Wastewater Treatment Plant (WwTP) for treatment.

- *Information to confirm whether there is an outflow or a junction box close to the end of the Airport Runway at Killaspugbrone.*

MUCH 

The decision-maker has advised that treated effluent is discharged from the Strandhill WwTP to the sea at a location some 300m from the shore line.

CLOSER

Review

Under Article 11 of the Regulations, you have a right to seek an internal review of our decision. An internal review must be requested within one month of receipt of our decision. There is no charge for requesting an internal review. If you would like to seek an internal review, you can do so by sending an email to foi@water.ie

Yours sincerely,

inspected on low tide

Noel Shannon
AIE Officer

Uisce Éireann

Gmail

Ann McKirdy <ainenicamhlaidh@gmail.com>

RE: WWTP for Strandhill Info Initial Assessment

OESAIEFOI <OESAIEFOI@epa.ie> Fri, May 16, 2025 at 9:06 AM
To: Ann McKirdy <ainenicamhlaidh@gmail.com>, Licensing Staff <licensing@epa.ie>
Cc: OESAIEFOI <OESAIEFOI@epa.ie>

Dear Ms McKirdy

With regard to your further query raised below, I hope the following clarifies this matter for you:

"The correspondence that issued contained a reference to the Inspectors Report (IR) associated with the 2013 licence application. The pe is discussed in the IR and for fullness the relevant extract is attached here:

The village of Strandhill is located on the northern coast of County Sligo, approximately 8 km west of Sligo town. The town has historically benefitted from its coastal position in terms of tourism revenue and in recent times has attracted a lot of additional tourism with the rise in popularity of surfing and other watersports. Due to its proximity to Sligo town and its designation as a Key Satellite Village in the Sligo County Development Plan 2005 - 2011, the village of Strandhill has grown in population in recent years, with an existing population equivalent of 1,887 p.e. at the time the application was submitted. In the draft Sligo County Development Plan 2011 - 2017, Strandhill is designated as a Principal Gateway Satellite with a recommended population level of 1,700 persons by 2017.

WWTP Conflicting Capacity

Kind regards

Kathleen Byrne

Business Support & Environmental Assessment Team

Water, Energy and Business Support Programme

Office of Environmental Sustainability, Wexford

Foireann Tacaíochta Gnó & Measúnaithe Comhshaoil

An Clár Tacaíochta maidir le hUisce, Fuinneamh agus Gnó

An Oifig um Inbhuanaitheacht Comhshaoil, Loch Garman

Environmental Protection Agency

053 9160600 (Reception)

www.epa.ie

WWTP Conflicting Capacity



[Quoted text hidden]

Gmail

Ann McKirdy <ainenicamhlaidh@gmail.com>

Overflowing Sewage at WWTP Reported attached

23-153-12
1 message

OPR Info <info@opr.ie>
To: Ann McKirdy <ainenicamhlaidh@gmail.com>

Mon, May 26, 2025 at 12:02 PM

23-153-12-OPR

Dear Ms McKirdy,

The Office of the Planning Regulator (OPR) acknowledges receipt of your correspondence dated 25th May 2025.

Your correspondence is under consideration and a reply will issue in due course.

Kindest regards,

Sarah

Sarah Leonard

Reviews and Examinations

Oifig an Rialaitheora Pleanála

Office of the Planning Regulator

Teach na Páirce, 191-193A An Cuarbhóthar Thuaidh, Baile Átha Cliath 7, D07 EWV4

Park House, Grangegorman, 191-193A North Circular Road, Dublin 7, D07 EWV4

T +353 (0)1 854 6700

www.opr.ie

WWTP May 25
Formal Complaints EPA
Overflowing Sewage May 25

From: Ann McKirdy <ainenicamhlaidh@gmail.com>
Sent: Sunday 25 May 2025 17:12
To: OESAIEFOI <OESAIEFOI@epa.ie>; Bathing Water <bathingwater@sligococo.ie>; Planning Emails <planning@sligococo.ie>; Development Planning Unit Sligo County Council <dpu@sligococo.ie>; planning@irishwater.ie; OPR Info <info@opr.ie>; FOI <FOI@water.ie>; info@water.ie
Cc: Licensing Staff <licensing@epa.ie>
Subject: Formal complaint - environment - WWTP- Wastewater plant spillage overflow Stramdhill

May 25th 2025

CAUTION: This eMail originated from outside your organisation and the BTS Managed Desktop service. Do not click on any links or open any attachments unless you recognise the sender or are expecting the email and know that the content is safe. If you are in any doubt, please contact the OGCIO IT Service Desk.

To whom it may concern,

This is an official report to alert you to the fact that the Waste water plant in Strandhill Sligo is overflowing and there is a ferociously suffocating smell in the Strandhill area. Currently there is a hazmat response team at the plant, Wimsey contractor is present also (25/5/2025).

This is another loud alarm bell raising serious concerns for significant deficits at this plant to treat the current load. This spillage poses a risk to human health and the environment. I have been reporting my concerns and documenting this for years.

The projected head room at this plant is seriously overstated. The WWTP is at capacity. This is a major incident. There is human excrement and waste spillage all over the road and the area.

I look forward to the formal response from the EPA, Uisce Eireann, the OPR and Sligo County Council, all of whom are addressed herein.

Yours sincerely,

Ann McKirdy

12/05/2025

BY EMAIL: ainenicamhlaidh@gmail.com

Duplicate 23/5/26 EPA's formal Reply

RE: WWTP for Strandhill D0107-01.

Dear Ms McKirdy

Further to your query received on 31 March 2025, the following sets out the answers in this regard:

1. *How is the calculation for PE for the Waste Water Treatment plant in Strandhill, Sligo calculated?*
   The Glossary of Terms of Wastewater Discharge Licence (WWDL)) Register Number D0107-01 describes population equivalent as:
   A measurement of organic biodegradable load and a population equivalent of 1 (1 p.e.) means the organic biodegradable load having a five-day biochemical oxygen demand (BOD5) of 60g of oxygen per day; the load being calculated on the basis of the maximum average weekly load entering the waste water works during the year, excluding unusual situations such as those due to heavy rain.
   WWDL Register No. D0107-01 can be found at the following link: WWDL Register No. D0107-01

Contradiction

2. *What is the current PE rate?*
   The 2023 Annual Environmental Report (AER) for WWDL Reg. No. D0107-01 states that the Wastewater Treatment Plant (WWTP) was constructed to service 3,700 p.e., that the collected load in the peak week in 2023 was 2,458 p.e. and that the remaining p.e. capacity at the plant is 1,242 p.e.
   The AER for 2024 will be submitted by Uisce Éireann to the EPA and this will be made available on Leap Online at the following link: Licence Profile | LEAP Online

3. *Why has the EPA sanctioned an unlicensed contractor, Wimsey to service this plant?*
   The EPA has not sanctioned any contractors to service the WWTP. The operation and maintenance of the WWTP is the responsibility of the licensee, Uisce Éireann.
   The EPA confirmed to you on the 31/07/2024 that Uisce Éireann had provided the following information on the 26/07/2024:
   "Sludge management at the wastewater treatment plant. Strandhill WwTP is a DBO (Design, Build, Operate) plant, which is operated on behalf of Uisce Éireann by Coffey Water. Coffey Water in turn has a commercial agreement in place with a contractor engaged for the purposes of sludge movements out of the Strandhill Plant. All sludge generated at the Strandhill WWTP is transported to the Sligo Sludge Hub Centre for treatment."
   Please contact Uisce Éireann with regard to any data sought regarding contractors that may operate at the works.

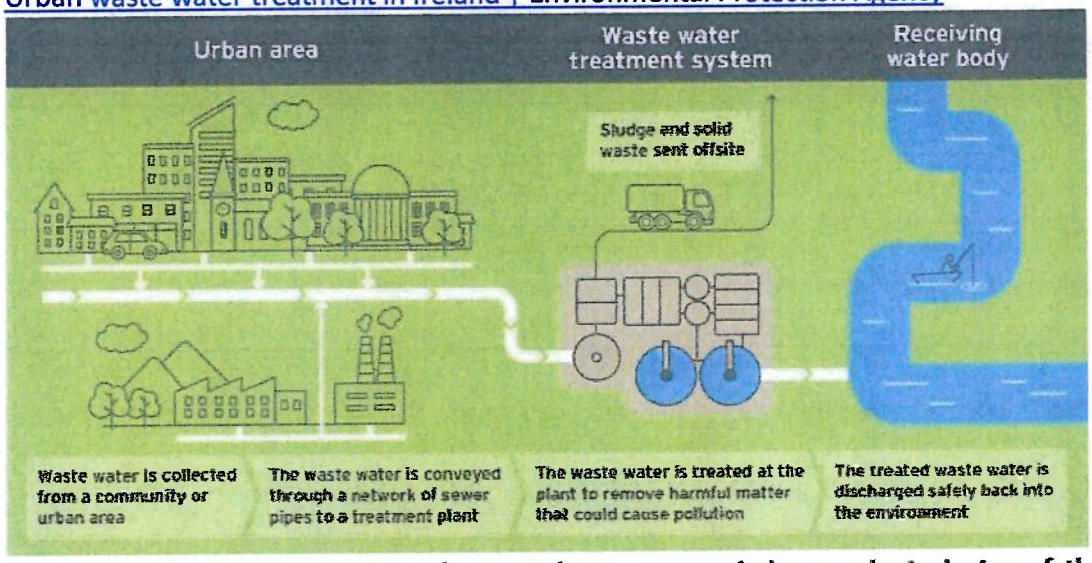
4. *Is the EPA aware that there are two truckloads of sludge/waste removed weekly?*

Formal Complaint
EPA

12/05/2025

BY EMAIL: ainenicamhlaidh@gmail.com

Uisce Éireann report on the sludge accepted at any plant as part of their AER.
Uisce Éireann can remove sludge as part of the operation process to ensure excess sludge is removed from the treatment system. Please note the "Sludge and solid waste sent off-site" in the diagram below. Link to the diagram and supporting is at the following address: Urban waste water treatment in Ireland | Environmental Protection Agency



During an EPA site visit in 2024 (SV27333) it was noted that works inclusive of the construction of a sludge thickening facility were completed (Site Visit Report No. SV27333).

5. *Is this normal standard operating procedure for the efficient disposal of waste?*
Sludge removal is part of the operation of a WWTP. Please refer to the above flow chart. If sludge was not removed from a WWTP the system would contain excess sludge and the treatment process would be compromised. The volume and frequency of sludge removal varies at each plant as it is dependent on the inputs into the treatment system and the type of WWTP.

6. *What is the risk to human life of the high levels of Ammonia in the waste disposed to sea?*
Schedule A of the WWDL (WWDL Register No. D0107-01) states that the discharge from the WWTP shall be below the Ammonia Emission Limit Value (ELV) of 0.85mg/l (as N).
   - The 2023 AER states that out of 13 wastewater discharge samples were tested in 2023 and 2/13 samples failed the ELV for Ammonia. The annual mean of Ammonia of the 13 samples tested was reported as 0.410mg/l (as N).
   - The 2023 AER states that two ambient Strandhill coastal samples taken in July and November 2023 resulted in Ammonia levels of 0.44mg/l and 0.51mg/l respectively.
   - The European Communities Environmental Objectives (Surface Waters) Regulations 2009, as amended, does not provide a limit on the nutrient conditions relating to Total Ammonia (mg N/l) for coastal or transitional waters.

Fail

12/05/2025

BY EMAIL: ainenicamhlaidh@gmail.com

7. *Trace metals and chemicals, what are the pollutants which are dangerous to human health that are currently being monitored at this WWTP and in the waters around this plant?*

Condition 4.19 Priority Substances and Schedule B: Ambient Monitoring of the WWDL (WWDL Register No. D0107-01) describes the parameters that are required to be tested in the receiving waterbody, Sligo Bay.

8. *Who is the contractor monitoring this?*

Uisce Éireann are required to take samples in accordance with the licence and report on the results of these samples as part of the AER they submit annually. Where any exceedances of the ELV occur Uisce Éireann submit incidents to the EPA. Both AERs and Incidents are available online using the Leap Online portal: Licence Profile | LEAP Online

9. *At what point will the public be informed of the dangerous levels of toxins?*

All monitoring data required by the WWDL is reported to the EPA as part of the AER submitted annually by Uisce Éireann. All AERs submitted by Uisce Éireann are available to the public online using the LEAP Online portal.

Where an incident has occurred due to the breach of an ELV, Uisce Éireann are required to follow Condition 6.1 of their licence and report this incident to the EPA. These incidents are also available to the public via the Leap Online portal. Condition 6.1 requires Uisce Éireann to report incidents to other state bodies are also required to be notified inclusive of the Department of Agriculture, Food and the Marine, the Martine Institute, the Sea Fisheries Protection Authority, the Food Safety Authority of Ireland and an Bord Iascaigh Mhara.

10. *How is the results recorded, reported and monitored?*

As described above, results are reported via Uisce Éireann's submission of AERs which are available on LEAP Online and via incident reports where exceedances have occurred, also available on LEAP Online.

11. *How is the designation of SAC around the WWTP and the receiving sea water at Killaspugbrone impact the assessment of PE?*
12. *There was no Whorl Snail Assessment done on the SAC site in spite of the fact that this was clearly outlined, please explain how this was sanctioned without an Environmental Assessment?*

Response to Queries 11 and 12:

The p.e. relates to the of organic biodegradable load being collected and routed to the WWTP for treatment. The ELVs set out in Schedule A of the WWDL take into consideration the p.e. and the nature of the load during the application assessment process. The ELVs are put in place to project the receiving waters and any associated sensitive areas. Compliance with EU Directives is discussed as part of the Inspector's Report that accompanied the recommended licence. Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC,

inclusive of the narrow-mouthed Whorl Snail, and Cummeen Strand SPA formed part of this assessment.

13. *How is the tourism influence, daily visitors and overnight visitors factored in?*
14. *How is the most popular surfing site, 'Bluerock' 100 m from the new WWTP factored in?*
15. *How are the Shellfish Waters, for the Coney Island Shellfish farm 200m from the facility factored in?*
16. *Surfer visitors at the National Surf Centre particularly those from the four surf schools in Strandhill getting lessons at the seafront and directly in front of the WWTP (less than 100m) factored in?*
17. *The hugely popular Killaspugbrone Looped trail is bringing in excess of 500,000 visitors per year to Strandhill across the sensitive SAC and Salt-marshes, how are these visitor numbers factored or considered?*
18. *The Sligo Strandhill Golf club visitors, how are these visitors factored in? I'm excess of 70,000 visitors per year?*
19. *The very popular Strandhill Sunday Market at the Airport in Strandhill brings in excess of 200,000 visitors to the village each year, how are these visitors considered?*
20. *The Strandhill Caravan park caters for in excess of 100 caravans and approximately 50 tents, how are these seasonal visitors factored into the WWTP treatment capacity?*
21. *The Warriors Run Brings 50,000 +visitors to Strandhill in August each year, how is this catered for?*
22. *The hotels, B&B, Air B&B, hostels (these hostels are permanently housing Ukrainian refugee families).*
23. *Sports, The Sligo Rugby Club and the soccer at Strand Celtic bring thousands of athletes and visitors to Strandhill, how are these catered for?*
24. *The new twice hourly bus service from Sligo to Strandhill brings thousands of day trip visitors, how are these factored into the WWTP capacity?*
25. *Sligo Airport rescue facility brings approximately a hundred visitors; employees, students and visitors daily to the village.*
26. *Pubs and Restaurants; how do the many visitors to these establishments get factored into the WWTP capacity?*
27. *Church goers, there are two churches in the village, both are full to capacity for Sunday service, how are these visitors catered for?*
28. *The school, St Patrick's NS, has an enrolment of over 230+ students and 30 staff, how is this factored in?*

Response to Queries 13 – 27:

The population equivalent of the Strandhill agglomeration was considered as part of the WWDL application process prior to the granting of a licence. In 2013, the population equivalent of the agglomeration was estimated as 1,887p.e. and it was estimated this would grow to 1,700p.e. by 2017. This is described in the Inspector's Report relating to the application for a wastewater discharge licence for the Strandhill agglomeration (Inspector's Report).

12/05/2025

BY EMAIL: ainenicamhlaidh@gmail.com

Uisce Éireann report on the remaining p.e. capacity of the works annually and the 2023 AER for WWDL Reg. No. D0107-01 states that the WWTP was constructed to service 3,700 p.e., that the collected load in the peak week in 2023 was 2,458 p.e. and that the remaining p.e. capacity at the plant is 1,242 p.e. The data provided by Uisce Eireann confirms that the plant has remaining p.e. capacity.
Condition 1.7 of the licence requires Uisce Éireann to monitor the remaining treatment capacity at the WWTP and where the capacity will be exceeded with the ensuing three-year period, Uisce Éireann shall seek a licence review from the EPA.

29. *The new plant exceeds the footprint mandated, what approval has this received given the existing habitat of Whorl Snail as clearly stated in the Engineers Report?*
30. *How has this plant been permitted to proceed when the part 8 was undertaken in 2008 and all of the residential and visitor data was outdated and irrelevant by that time?*
31. *The new Development Plan proper sea that there is capacity for in excess of 1200 PE, please advise how is the capacity possible?*

Response to Queries 29 and 31:
The WWDL authorises the discharge of wastewater from the wastewater works servicing the Strandhill agglomeration. You should contact the Planning Authority with regard to any concerns you may have the Sligo County Development Plan 2024 – 2030 and regarding Uisce Éireann's adherence to the conditions of any permission granted for the development of the wastewater works (Making a Complaint).

32. *The noxious odour at Killaspugbrone point where the pipe dumps to sea has been reported by myself on numerous occasions, has this been investigated?*
33. *What is the outcome of the investigation?*

Response to Queries 32 and 33:
The EPA provided responses to Complaint Ref. No. COM019342 on the 31/07/2024 and 20/08/2024 inclusive of a response from Uisce Éireann. Uisce Éireann did not detect odour issues at the plant or the network.
The WWDL requires that a grab sample from the primary discharge monitoring location is taken daily and a sample from Sligo Bay is taken weekly to provide for a visual inspection and part of this inspection includes an examination of odour. Should it be the case that odour is a concern Uisce Éireann should be contacted in the first instance. It may be the case that Uisce Éireann can report on the results of these examinations and whether odour has been noted on the network or plant at the time of the complaint.
If the response from Uisce Éireann is not to your satisfaction and the issue of odour remains the EPA should be contacted (inclusive of the Reference Number of the Uisce Éireann compliant, if possible).

34. *Can the EPA safeguard the health of the recreational users of the sea in Strandhill and the consumers of the oysters farmed here?*

12/05/2025

BY EMAIL: ainenicamhlaidh@gmail.com

Uisce Éireann are required to notify the Sea-Fisheries Protection Authority (SFPA) of any incident that could impact Sligo Bay Shellfish Area. The SFPA have classified the beds in this shellfish area as Class B (Shellfish Classified Areas | Sea Fisheries Protection Authority). The SFPA is the competent authority for the regulation of the seafood sector including aquaculture and oversees the implementation and compliance with food safety legislation. The SFPA also carries out a monthly shellfish sampling programme in all active shellfish production areas with the results determining the classification of each area for the sale or consumption of shellfish (Shellfish Safety | Sea Fisheries Safety Authority).

Details on bathing water quality are on Beaches.ie

35. *What concern does the EPA have for the proposal to increase residential settlement by 1200 for this WWTP?*

As highlighted in the response to queries numbers 13-27 above, Uisce Éireann have reported that the remaining p.e. capacity at the plant is 1,242 p.e.
Condition 1.7 of the licence requires Uisce Éireann to monitor the remaining treatment capacity at the WWTP and where the capacity will be exceeded with the ensuing three-year period, Uisce Éireann shall seek a licence review from the EPA.

I trust this is to your satisfaction.

Yours sincerely

Kathleen Byrne

Water, Energy and Business Support Programme
Office of Environmental Sustainability, Wexford
Foireann Tacaíochta Gnó & Measúnaithe Comhshaoil
An Clár Tacaíochta maidir le hUisce, Fuinneamh agus Gnó
An Oifig um Inbhuanaitheacht Comhshaoil, Loch Garman

Environmental Protection Agency
An Ghníomhaireacht um Chaomhnú Comhshaoil

053 9160600 (Reception)

www.epa.ie

12/05/2025

BY EMAIL: ainenicamhlaidh@gmail.com

Gmail

Ann McKirdy <ainenicamhlaidh@gmail.com>

RE: 23-153-12 - OPR further correspondence reply

1 message

Thu, Jan 25, 2024 at 2:51 PM

OPR Info <info@opr.ie>
To: Ann McKirdy <ainenicamhlaidh@gmail.com>

23-153-12-OPR

Dear Ms McKirdy,

Thank you for your recent further correspondence to the Office of the Planning Regulator (OPR), dated 25th January 2024.

The Environmental Protection Agency (EPA) will investigate certain types of complaints concerning environmental problems. Further information on can be found on their website. https://www.epa.ie/

Kind regards,

Liam

Liam Byrne

Executive Officer

Reviews and Examinations

Oifig an Rialaitheora Pleanála

Office of the Planning Regulator

An Ceathrú hUrlár, Teach na Páirce, 191-193A An Cuarbhóthar Thuaidh, Baile Átha Cliath 7, D07 EWV4

Fourth Floor, Park House, Grangegorman, 191-193A North Circular Road, Dublin 7, D07 EWV4

T +353 1 01 854 6700

www.opr.ie



From: Ann McKirdy <ainenicamhlaidh@gmail.com>
Sent: Thursday 25 January 2024 12:39
To: OPR Info <info@opr.ie>
Subject: Re: 23-153-12 - OPR case reply

CAUTION: This eMail originated from outside your organisation and the BTS Managed Desktop service. Do not click on any links or open any attachments unless you recognise the sender or are expecting the email and know that the content is safe. If you are in any doubt, please contact the OGCIO IT Service Desk.

Good morning Liam,

Thank you for your reply, I understand the OPR's position.

To whom should this be addressed? Which statutory authority outside of the County Council oversees such matters?

Please advise,

Many thanks,

Kind regards,

Ann

On Thu, Jan 25, 2024 at 12:30 PM OPR Info <info@opr.ie> wrote:

> **23-153-12-OPR**
>
> Dear Ms McKirdy,
>
> Please see attached correspondence from the Office of the Planning Regulator, dated 25th January 2024.
>
> Kind regards,
>
> Liam
>
> ———
>
> **Liam Byrne**
>
> Executive Officer
>
> Reviews and Examinations
>
> ———
>
> **Oifig an Rialaitheora Pleanála**
>
> Office of the Planning Regulator
>
> **An Ceathrú hUrlár, Teach na Páirce, 191-193A An Cuarbhóthar Thuaidh, Baile Átha Cliath 7, D07 EWV4**

Fourth Floor, Park House, Grangegorman, 191-193A North Circular Road, Dublin 7, D07 EWV4

T +353 1 01 854 6700

www.opr.ie

From: Ann McKirdy <ainenicamhlaidh@gmail.com>
Sent: Wednesday 24 January 2024 22:31
To: OPR Info <info@opr.ie>
Subject: 23-153-12-OPR- Attached is the Appropriate Assessment for the WWTP in Strandhill

CAUTION: This eMail originated from outside your organisation and the BTS Managed Desktop service. Do not click on any links or open any attachments unless you recognise the sender or are expecting the email and know that the content is safe. If you are in any doubt, please contact the OGCIO IT Service Desk.

Dear Liam

I am attaching the Appropriate Assessment for Strandhill WWTP

I am appalled by the anomalies.

Pg 6 of Nicholas O'Swyer report June 2007 - In relation to environmental issues, the current www site is located in an SAC. The impact of plant expansion has already been assessed in an Environmental Assessment by Dr. Don Cotton, CREDCO, and as a result the new WWTW will be entirely within the existing WWTW boundary.

Pg 5 Alle buildings on the treatment works site will be restricted to a maximum height of 6.0 meters above the existing background level as shown in DRawing no 20391 PL SL 01

THIS DID NOT HAPPEN

THE NEW WWTP IS APPROX 6 TIMES THE FOOTPRINT OF THE OLD WWTP - ITS ALMOST THREE STOREY HIGH WITH HIGH VOLTAGE ELECTRICITY PYLONS

pg 4 - June 2007

The exact size and position of the units and the eact process will be decided by the Contractor at the design stage, however, the Contractor will be obliged to stay within the site boundary and its height restrictions and comply with the requirement of PART 8 PLANNING.

Only ONE site assessment was conducted for the Appropriate Assessment on the 12th of August 2013 by Dr. Evelyn Moorkens

pg 28 of Nicholas O'Dwyer report - All works will be undertaken within the existing site boundaries. NO protected habitats are located within the boundary of the existing wwtp.

pg 18 The Strandhill WWTW has been identified in the Action Plan as a 'pressure risk' in the Gravogue Water MAnagement unit. This pressure relates to the wrisk to water quality relating to insufficient WWTP cap;acity and insufficient assimilative capacity for BOD.

The maps attached are shocking - this is THE NATIONAL SURFING CENTRE OF EXCELLENCE - The only one in Ireland, constructed at a cost of more than €4 Million - supported by Failte Ireland. This sewage dumps directly into BLUE ROCK - one of the top destinations for surfers in Ireland . This bathing water quality has been monitored in Dorrins Strand and Strandhill by Sligo. Co. Co. This area has a very popular surf destination for more than 40 years. It is 50 m from the WWTP. And always has been.

The mapping of the Whorl Snail by Dr. Moorkens shows that the new WWTP has been constructed on the identified Annex 11 site per her report in 2013.

pg 29 - Nicholas Dwyer report -

It will be a condition of the contract Documents that the design of the new system shall be **no bigger or deeper than the existing plant.**

The design, construction and operation of the new systems will be done in full knowledge of the sensitive SAC that surrounds the site and all aspects of the project will be carried out to ensure the protection of the structure and function of the surrounding habitats and species.

P-NH 4 Consulta with the relevant prescribed bodies and appropriate agencies wien undertaking approving or authorising development s which are likely to affect designated natural heritage sites or those proposed to be designated.

The Dept of Housing Local Government and Heritage which oversees Marine environment, shellfish waters, marine protected areas, foreshore consenting, water safety, nature conservation - European Sites - biodiversity, landscape, national monuments - was not CONSULTED.

O-NH - 6 Support and cooperate with statutory authorities and others in support of measures taken to manage designated nature conservation sites in order to achieve their conservation objectives and where available specific registered shall be made to conservation management plans and their conservation objectives.

O-NH- 2 Assess in accordance with the relevant legislation all proposed developments which are likely to have a significant effect (directly or through indirect or cumulative impact) on designated natural heritage sites, sites proposed for designation and protected species

NOT done!

O-NH - 3 - When considering an y plan or project the planning authority must comply fully with Article 6 of the EU habitats Directive (as transposed into Irish Law by the EU Habitats Directive

not done

Aquafact - Hydrodynamic Dispersion Modelling - Nichoas O Dwyer June 2013 -

Please see report - Dr E. A Moorkens - polygons pg 2, map p 3 0 showing clearly - there are protected annex 1 1 VErtigo Angustior present in the area that HAS NOW been developed.

This development is illegal and Sligo Co, Co. has wilfully misled the planning authorities.

I look forward to your response.
I will be taking my complaint to the European Union if this is not addressed within the parameters of the EU Waste Water Planning Framework and Article 6.

Yours sincerely,

Ann McKirdy

Part 8 Standhill
2025

Find text or tools

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

For inspection purposes only.
Consent of copyright owner required for any other use.

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	

NB

AA

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.

MANDATED

Yours sincerely

Environmental Licensing Programme

Office of Climate, Licensing & Resource Use

Tel: 053-9160600

AA Mandated
under F.I.



AA MEMBER

Gmail

Ann McKirdy <annmckirdy@gmail.com>

Draft Sligo County Development Plan 2017-2023

6 messages

Declan Bree <dbree@eircom.net> Tue, Sep 20, 2016 at 7:11 PM
To: Declan Bree <dbree@eircom.net>
Cc: Pat Fallon <impactsligo@gmail.com>, Corey Whyte <whytecorey@gmail.com>, Tim <timmulcahy3@gmail.com>, Joe McGowan <joemcgowan@sligoheritage.com>, annmckirdy@gmail.com, David O'Hara | SUP For All <david@supforall.ie>, Fiónа Gallagher <fionagallaghersligo@gmail.com>, Frevin West <frevin_west@eircom.net>, Fiónа Gallagher <fiona.gallagher@iolfree.ie>, Gerry McCanny <Gerry@mccannysolicitors.com>, gregoryjdaly@yahoo.ie, rogertgarland@gmail.com

The Draft Sligo County Development Plan 2017-2023 and associated documents are now available to view or download on the Council's website at www.sligococo.ie/cdp from **21 September 2016.**

The Draft CDP package consists of the following documents:

A – Draft CDP 2017-2023 – Volume 1 (Main Written Statement)

B – Draft CDP 2017-2023 – Volume 2 (Mini-Plans)

Note: Volume 2 comprises a General Policies chapter (Chapter 1) and 32 Mini-Plans grouped by Municipal District, for your convenience.

C – Landscape Characterisation Map with proposed changes to Scenic Routes

D – Housing Strategy supporting the Draft CDP 2017-2023

E – County Retail Strategy supporting the Draft CDP 2017-2023

F – Proposed Changes to the Record of Protected Structures

G – Strategic Flood Risk Assessment of the Draft CDP 2017-2023

I – Non-Technical summary (Strategic Environmental Assessment)

The following associated documents will be available shortly

H – Environmental Report (Strategic Environmental Assessment)

J – Appropriate Assessment Screening Report (Habitats Directive)

The Draft CDP 2017-2023 will be placed on public display for a period of 10 weeks from **21 September to 30 November 2016.** During this period, written submissions or observations will be invited from the public

---

Ann McKirdy <annmckirdy@gmail.com> Wed, Oct 19, 2016 at 6:03 PM
To: Declan Bree <dbree@eircom.net>

Dear Declan,
Thank you for forwarding to Sligo County Development Plan 2017-2023.
I believe there are a number of issues regarding development in Strandhill that need to be addressed.

The Ballysadare Bay 00622 threats to site includes ; Recreational/ Amenity use, Erosion (natural and anthropogenic) Tourism Related development , Introduction of invasive species and illegal dumping.



2016
Killaspugbrona

 Killaspugbrone

The looped trail from Carrowbunnan through Killaspugbrone and around to Dorrins strand should never have been approved based on the Requirements for Special Areas of Conservation. I have read the Council prepared Assessment for this site, it is not an accurate assessment as it is based on the false premise that there was an existing looped trail in use over this site. I have documentary evidence and local knowledge shared with me by the older residents of Strandhill.

Specifically in the new 2017-2023 development the stated plan is to maintain existing trails and further establish looped trails. The current trail, the Killaspugbrone loop contravenes the Habitat Directive for this SAC.

According to the Council's plan, OCP 3, p 123 Monitor existing dune management schemes on an ongoing basis and carry out appropriate repairs, improvements and extensions subject to availability of resources and compliance with Habitat Directive. Where appropriate continue to employ soft engineering techniques, ie. Dune stabilisation and planting.

There has been some fencing of the dunes to prevent walkers tramping the dunes, however, to date there has been no replanting, unless there is replanting of Marram Grass, this effort to stabilise the dunes is futile.

OCP - Identify, prioritise and implement Coastal protection works within the coastal zone where considered necessary subject to the availability of resources and compliance to habitat directive.

OCP 4 Beach bye laws, protection of the Dunes.

The residential development of 34 new homes on Top Road contravenes the Councils directive that no new dwellings will be permitted until the new sewage treatment plant is operational.

'Strandhill's Archaeological Gem,' so described in the previous Mini Plan 'the ecclesiastical site at Killaspugbrone is of immense heritage value.' I am surprised that this gem is not listed as one of the Protected Structures in Strandhill, The Post Box is, Rathcarrick House is, yet this incredibly important historical structure and site is not.

There is also the issue of Infrastructure, specifically the proposed new road linking Airport Road, R277 with R292, this plan was rejected based on an environmental impact in the former plan 2013-2017.

I appreciate you sending me the document, it is a very lengthy document, I have focused on Strandhill and trust you will follow up on the above mentioned objections with the County Council.

Many thanks,
Yours sincerely,

Ann McKirdy
[Quoted text hidden]

Declan Bree <dbree@eircom.net> Wed, Oct 19, 2016 at 6:23 PM
To: Ann McKirdy <annmckirdy@gmail.com>

Dear Ann

Many thanks for your email.

You don't appear to be making any specific recommendations with regard to amending the Draft Plan.

The draft Development Plan is out for public consultation so as to allow members of the public to make suggestions/recommendations in regard to amending the Draft.

If you believe a section needs to be amended by way of adding or deleting text, or indeed by including new paragraphs, you have the right to make a submission, which must by law be considered by the Council.

I would recommend that you be specific in terms of the suggested amendments.

You might also please copy me with any amendments you are recommending.

With kind regards.

I remain, yours sincerely

COUNCILLOR DECLAN BREE

ps The ecclesiastical site Killaspugbrone is a National Monument and is therefore protected by the State. In this context local authorities do not include national monuments in their lists of protected structures.

[Quoted text hidden]
[Quoted text hidden]

Ann McKirdy <annmckirdy@gmail.com> Wed, Oct 19, 2016 at 7:44 PM
To: Declan Bree <dbree@eircom.net>

Dear Declan,
Many thanks for your prompt email reply, I will do as you suggest and copy you.
Kind regards,
Ann
[Quoted text hidden]

Ann McKirdy <annmckirdy@gmail.com> Sat, Jan 8, 2022 at 2:22 PM
To: Aine Nic Amhlaidh <Ainenicamhlaidh@gmail.com>

[Quoted text hidden]

Ann McKirdy <annmckirdy@gmail.com> Tue, Feb 8, 2022 at 5:14 PM
To: Gerry McCanny <Gerry@mccannysolicitors.com>

Dear Mr McCanny,
I am writing to ask you if there is any possibility you might have downloaded the 2017-2023 Draft Amendment **B – Draft CDP 2017-2023 – Volume 2 (Mini-Plans)**

I am specifically looking for the Draft Proposal for that year and the Maps for Strandhill.

Looped Trails 2016

---------- Forwarded message ---------
From: **Ann McKirdy** <annmckirdy@gmail.com>
Date: Wed, May 11, 2016 at 3:04 PM
Subject: Killaspugbrone, Strandhill, Sligo National looped walk
To: jboydell@sportireland.ir

>
> Cc: June Boydell, National Trails and Walks
>
>
> Dear Michael,
>
>
>
> I am writing to follow up on my query yesterday regarding the Environmental
> Impact Report I had requested to see regarding the development of the
> National Looped Walk in the Special Conservation Area of Killaspugbrone. I
> had requested to view this report as I have seen an alarming degradation of
> this Special Conservation Area due to the increase in walkers since the new
> National Looped Walk has opened. I was very surprised and disappointed to
> learn that no Environmental Impact Report had been undertaken in spite of
> the fact that this area is designated under EU law as a Special Area of
> Conservation.
>
>
>
> According to the County Sligo Development Plan 2011-2017 Natura Impact
> Report 2013 there are specific requirements and obligations on the County
> Council to ensure that no development will take place in these SAC's
> without appropriate assessment.(National Parks and Wildlife Service
> Ballysadare Bay SAC; http://www.npws.ie/protected-sites/sac/000622)
>
>
>
> You had mentioned during our conversation that the County Council did not
> do anything except signpost an existing pathway. The Killaspugbrone
> Preservation Project contradicts this, its report states 'In 2005/2006
> consultations were held with the Sligo County Council to establish which
> paths should be used. Grant aid and Project funds financed the erection of
> finger-posts on the paths and this greatly helped the protection of the
> dunes.' Local resident, Deirdre Foley, who is in her 80's and has lived
> here all her life and whose family is buried in Killaspugbrone says access
> to the church was always by the shore.
>
>
>
> Sligo County Council's mandate is to protect this area, your own report has
> highlighted the necessity for a raised board walk if this area was to be
> further developed for tourism. To re state the importance of this SAC and
> quote from the Council's own report, 'The Department recognises that this
>
> ----- Message truncated -----
>

Michael Carty <mcarty@sligococo.ie> Fri, May 13, 2016 at 2:45 PM
To: Ann McKirdy <annmckirdy@gmail.com>, "dkennedy@sligoleader.com" <dkennedy@sligoleader.com>, "Cllr. Sinead Maguire" <sineadmaguire@yahoo.com>, Cllr Declan Bree <dbree@eircom.net>, "cgonley@sligoleader.com" <cgonley@sligoleader.com>, "jboydell@sportireland.ie" <jboydell@sportireland.ie>
Cc: Deirdre Kennedy <dkennedy@sligoleader.com>

Dear Ms. McKirdy,

looped Trails
2016

Thank you for your mail.

May 2016 Michael Carty Sligo Co.Co

I wish to apologise, clarify and correct any confusion which may have arisen during our telephone conversation. An Appropriate Assessment (AA) screening report was carried out ,as required under the Habitat's Directive was for the Killaspugbrone Loop walk. It is available in hardcopy at the Sligo County Council offices, City Hall for review upon request.

I welcome your concept idea of a raised boardwalk, and will investigate potential funding opportunities in this regard.

Yours,

Michael Carty

Michael Carty

Senior Executive Engineer

Sligo County Council

City Hall

Quay St.

Sligo

mcarty@sligococo.ie

tel. (w) 0719114403

Sligo

Sets your spirit free

2016

Sligo Leader

Deirdre Kennedy

From: Ann McKirdy [mailto:annmckirdy@gmail.com]
Sent: 12 May 2016 13:21
To: dkennedy@sligoleader.com; Cllr. Sinead Maguire; Cllr Declan Bree; cgonley@sligoleader.com; jboydell@sportireland.ie; Michael Carty
Subject: Fwd: Killaspugbrone, Strandhill, Sligo National looped walk

cc: Chris Gonley

cc: Sinead Maguire

cc: Declan Bree

cc: Michael Carty

cc: June Boydell

Dear Deirdre,

You may recall that I spoke with you some weeks ago regarding my concern for the extensive damage being done to the Special Area of Conservation (SAC) by walkers on the Killaspugbrone loop. I am forwarding the emails I have sent to Michael Carty, Sligo County Council and June Boydell, Irish Trails regarding my concerns for the Special Area of Conservation in Strandhill, since this has been included in the Lúb Náisiúnta.

No AA

I was very surprised to learn that there was no environmental impact report undertaken prior to opening this National Loop on a European Union designated SAC protected site. This area has a special designation under EU law, the Sligo County Council (on behalf of the Irish Government) have an obligation to protect this area.

I apologise for omitting to send this to you yesterday. I will forward all emails pertaining to this that I have sent to Michael Carty and June Boydell.

I am not opposed to tourism, I believe it is a wonderful boost to the local economy, and to Sligo in general. The area I am concerned about is of national importance as a heritage site (Killaspugbrone Church dates back to the 5th Century) and a Special Area of Conservation.

Maaram Grass

It is important to note the history of unstable sand and the damage unstable sand caused in the past. Maaram grass was planted in the 19th Century to stabilise shifting sands blowing over the original settlement. At that time the thatch cottages were inundated by sand causing the roofs to cave in. The inhabitants were forced to move to the slopes of Knocknarea.

Marram grass can stabilise up to 40 meters of sand, it was planted for this purpose in Strandhill over 100 years ago. It has also been used extensively in the Netherlands to reclaim land from the sea. It is essential that we maintain this grass to stabilise our protected dune systems. The grasses are also home to the dune nesting birds, specifically the sky lark and the tern which are on the EU Amber List for protected species.

We are custodians of this beautiful place, it is our responsibility to ensure this Special Area of Conservation is protected. There should be a raised board walk to keep walkers from destroying this delicate ecosystem.

I look forward to your response.

Sincerely,

Ann McKirdy

2016 looped Trail

Gmail

Ann McKirdy <annmckirdy@gmail.com>

Killaspugbrone, Strandhill, Sligo National looped walk

8 messages

Ann McKirdy <annmckirdy@gmail.com> Wed, May 11, 2016 at 3:04 PM
To: jboydell@sportireland.ir

2016 looped Trails

> Cc: June Boydell, National Trails and Walks
>
>
> Dear Michael,
>
>
>
> I am writing to follow up on my query yesterday regarding the Environmental
> Impact Report I had requested to see regarding the development of the
> National Looped Walk in the Special Conservation Area of Killaspugbrone. I
> had requested to view this report as I have seen an alarming degradation of
> this Special Conservation Area due to the increase in walkers since the new
> National Looped Walk has opened. I was very surprised and disappointed to
> learn that no Environmental Impact Report had been undertaken in spite of
> the fact that this area is designated under EU law as a Special Area of
> Conservation.
>
>
>
> According to the County Sligo Development Plan 2011-2017 Natura Impact
> Report 2013 there are specific requirements and obligations on the County
> Council to ensure that no development will take place in these SAC's
> without appropriate assessment.(National Parks and Wildlife Service
> Ballysadare Bay SAC; http://www.npws.ie/protected-sites/sac/000622)
>
>
>
> You had mentioned during our conversation that the County Council did not
> do anything except signpost an existing pathway. The Killaspugbrone
> Preservation Project contradicts this, its report states 'In 2005/2006
> consultations were held with the Sligo County Council to establish which
> paths should be used. Grant aid and Project funds financed the erection of
> finger-posts on the paths and this greatly helped the protection of the
> dunes.' Local resident, Deirdre Foley, who is in her 80's and has lived
> here all her life and whose family is buried in Killaspugbrone says access
> to the church was always by the shore.
>
>
>
> Sligo County Council's mandate is to protect this area, your own report has
> highlighted the necessity for a raised board walk if this area was to be
> further developed for tourism. To re state the importance of this SAC and
> quote from the Council's own report, 'The Department recognises that this
>
> ----- Message truncated -----
>

Mail Delivery Subsystem <mailer-daemon@googlemail.com> Wed, May 11, 2016 at 3:04 PM
To: annmckirdy@gmail.com

Delivery to the following recipient failed permanently:

jboydell@sportireland.ir

Technical details of permanent failure:
DNS Error: 220493353 DNS type 'mx' lookup of sportireland.ir responded with code NXDOMAIN
Domain name not found: sportireland.ir

----- Original message -----

DKIM-Signature: v=1; a=rsa-sha256; c=relaxed/relaxed;
d=gmail.com; s=20120113;
h=content-transfer-encoding:from:mime-version:subject:message-id:date
:to;
bh=wlfEdNIXsdynt53iOZLh/56PqPezfbwbR+LcYN9X9o0=;
b=wM1Vd2+Pf0c/d/dlVo+mAXOoQfWH8BZ+1xzpki5U5xavTTJw2HKTXvRLrAf1qsIFwg
vzyJTk+3i++Owb2yENHDmRj/2zeei9w6bpbPCLpDWF28RHh9Wpwn3amHdvJe43FVfUjj
MPnSYwT8g44oD7Qh0qnwhNHUESMimGTHI1SoV4OqF7LwsgIHEGMQ0jzgj7HotmbF4nle
ur+EXgt+vQkBW+34g473JiI2wGZ58xb1OXb3tcULfYvHzZCSxm2pTX+dk/aTszenGnNg
FK2WqikD1EJJp9SXscmJtHcoMVFXdrWHECf1wq7XdR8/hiPNICIuUOGZc/dAsZ0orL/4
MAKQ==
X-Google-DKIM-Signature: v=1; a=rsa-sha256; c=relaxed/relaxed;
d=1e100.net; s=20130820;
h=x-gm-message-state:content-transfer-encoding:from:mime-version
:subject:message-id:date:to;
bh=wlfEdNIXsdynt53iOZLh/56PqPezfbwbR+LcYN9X9o0=;
b=SX59pCRSb9hZZ62w2xm2kegR2iqTzMKlEvs/xcBFm8P7sovAcf5wn/869wUsp6eqAL
36CuHrrfcRaV+mSUyVWg25Bn/lRmuN4mEbHrshVPdSMuTcktfiLQ3qxd+leHlOgrJgAO
vd/P7tQbtpN0YSyLhSw69QUvXVDuOW+LjbG6RSAtPibpWi6v0zxOz1vtbf1TdVlNQ50B
JS2U3R/C9Q4SZU+UReACnGnKm2pCFZB8aqlfDXZcRO0/VGl26umEU58ho4ymSdZRGhHd
oNA+y03Lje5okSxNtV7QNpTv6mDtZ1mrUIHplYHm5xVZYFqPi0+u7iruGYcutx3veBes
oKRw==
X-Gm-Message-State: AOPr4FX/TD/NMZtHjxJii2iEDlVws83QrldvwaQZafoXlYdaL0n+htAlWGWy4S6iL0QE4g==
X-Received: by 10.194.14.130 with SMTP id p2mr4236050wjc.173.1462975457324;
Wed, 11 May 2016 07:04:17 -0700 (PDT)
Return-Path: <annmckirdy@gmail.com>
Received: from [10.72.65.169] ([213.233.150.28])
by smtp.gmail.com with ESMTPSA id a207sm8746435wma.8.2016.05.11.07.04.16
for <jboydell@sportireland.ir>
(version=TLSv1/SSLv3 cipher=OTHER);
Wed, 11 May 2016 07:04:16 -0700 (PDT)
Content-Transfer-Encoding: quoted-printable
Content-Type: text/plain;
charset=utf-8
From: Ann McKirdy <annmckirdy@gmail.com>
Mime-Version: 1.0 (1.0)
Subject: Killaspugbrone, Strandhill, Sligo National looped walk
Message-Id: <E1CB38AF-21A1-43D2-8B10-1EB53AC5DB3B@gmail.com>
Date: Wed, 11 May 2016 15:04:15 +0100
To: jboydell@sportireland.ir
X-Mailer: iPhone Mail (13E238)

>
> Cc: June Boydell, National Trails and Walks
>
>
> Dear Michael,
>
>
>
> I am writing to follow up on my query yesterday regarding the Environmental
> Impact Report I had requested to see regarding the development of the
> National Looped Walk in the Special Conservation Area of Killaspugbrone. I
> had requested to view this report as I have seen an alarming degradation of
> this Special Conservation Area due to the increase in walkers since the new
> National Looped Walk has opened. I was very surprised and disappointed to
> learn that no Environmental Impact Report had been undertaken in spite of
> the fact that this area is designated under EU law as a Special Area of
> Conservation.
>

> According to the County Sligo Development Plan 2011-2017 Natura Impact
> Report 2013 there are specific requirements and obligations on the County
> Council to ensure that no development will take place in these SAC's
> without appropriate assessment.(National Parks and Wildlife Service
> Ballysadare Bay SAC; http://www.npws.ie/protected-sites/sac/000622)
>
>
>
> You had mentioned during our conversation that the County Council did not
> do anything except signpost an existing pathway. The Killaspugbrone
> Preservation Project contradicts this, its report states 'In 2005/2006
> consultations were held with the Sligo County Council to establish which
> paths should be used. Grant aid and Project funds financed the erection of
> finger-posts on the paths and this greatly helped the protection of the
> dunes.' Local resident, Deirdre Foley, who is in her 80's and has lived
> here all her life and whose family is buried in Killaspugbrone says access
> to the church was always by the shore.
>
>
>
> Sligo County Council's mandate is to protect this area, your own report has
> highlighted the necessity for a raised board walk if this area was to be
> further developed for tourism. To re state the importance of this SAC and

----- Message truncated -----

Ann McKirdy <annmckirdy@gmail.com> Thu, May 12, 2016 at 1:21 PM
To: dkennedy@sligoleader.com, sineadmaguire@yahoo.com, dbree@eircom.net, cgonley@sligoleader.com, jboydell@sportireland.ie, mcarty@sligococo.ie

cc: Chris Gonley
cc: Sinead Maguire
cc: Declan Bree
cc: Michael Carty
cc: June Boydell

Dear Deirdre,

You may recall that I spoke with you some weeks ago regarding my concern for the extensive damage being done to the Special Area of Conservation (SAC) by walkers on the Killaspugbrone loop. I am forwarding the emails I have sent to Michael Carty, Sligo County Council and June Boydell, Irish Trails regarding my concerns for the Special Area of Conservation in Strandhill, since this has been included in the Lúb Náisiúnta.

I was very surprised to learn that there was no environmental impact report undertaken prior to opening this National Loop on a European Union designated SAC protected site. This area has a special designation under EU law, the Sligo County Council (on behalf of the Irish Government) have an obligation to protect this area.

I apologise for omitting to send this to you yesterday. I will forward all emails pertaining to this that I have sent to Michael Carty and June Boydell.

I am not opposed to tourism, I believe it is a wonderful boost to the local economy, and to Sligo in general. The area I am concerned about is of national importance as a heritage site (Killaspugbrone Church dates back to the 5th Century) and a Special Area of Conservation.

It is important to note the history of unstable sand and the damage unstable sand caused in the past. Maaram grass was planted in the 19th Century to stabilise shifting sands blowing over the original settlement. At that time the thatch cottages were inundated by sand causing the roofs to cave in. The inhabitants were forced to move to the slopes of Knocknarea.

Marram grass can stabilise up to 40 meters of sand, it was planted for this purpose in Strandhill over 100 years ago. It has also been used extensively in the Netherlands to reclaim land from the sea. It is essential that we maintain this grass to stabilise our protected dune systems. The grasses are also home to the dune nesting birds, specifically the sky lark and the tern which are on the EU Amber List for protected species.

We are custodians of this beautiful place, it is our responsibility to ensure this Special Area of Conservation is protected. There should be a raised board walk to keep walkers from destroying this delicate ecosystem.

I look forward to your response.
Sincerely,
Ann McKirdy

---------- Forwarded message ----------
From: **Ann McKirdy** <annmckirdy@gmail.com>
Date: Wed, May 11, 2016 at 3:04 PM
Subject: Killaspugbrone, Strandhill, Sligo National looped walk
To: jboydell@sportireland.ir

>
> Cc: June Boydell, National Trails and Walks
>
>
> Dear Michael,
>
>
>
> I am writing to follow up on my query yesterday regarding the Environmental
> Impact Report I had requested to see regarding the development of the
> National Looped Walk in the Special Conservation Area of Killaspugbrone. I
> had requested to view this report as I have seen an alarming degradation of
> this Special Conservation Area due to the increase in walkers since the new
> National Looped Walk has opened. I was very surprised and disappointed to
> learn that no Environmental Impact Report had been undertaken in spite of
> the fact that this area is designated under EU law as a Special Area of
> Conservation.
>
>
>
> According to the County Sligo Development Plan 2011-2017 Natura Impact
> Report 2013 there are specific requirements and obligations on the County
> Council to ensure that no development will take place in these SAC's
> without appropriate assessment.(National Parks and Wildlife Service
> Ballysadare Bay SAC; http://www.npws.ie/protected-sites/sac/000622)
>
>
>
> You had mentioned during our conversation that the County Council did not
> do anything except signpost an existing pathway. The Killaspugbrone
> Preservation Project contradicts this, its report states 'In 2005/2006
> consultations were held with the Sligo County Council to establish which
> paths should be used. Grant aid and Project funds financed the erection of
> finger-posts on the paths and this greatly helped the protection of the
> dunes.' Local resident, Deirdre Foley, who is in her 80's and has lived
> here all her life and whose family is buried in Killaspugbrone says access
> to the church was always by the shore.
>
>
>
> Sligo County Council's mandate is to protect this area, your own report has
> highlighted the necessity for a raised board walk if this area was to be
> further developed for tourism. To re state the importance of this SAC and
> quote from the Council's own report, 'The Department recognises that this
>
> ----- Message truncated -----
>

Ann McKirdy <annmckirdy@gmail.com> Thu, May 12, 2016 at 1:22 PM
To: jboydell@sportireland.ie

Michael Carty Sligo Co.Co

Gmail

Ann McKirdy <annmckirdy@gmail.com>

2016

Killaspugbrone, Strandhill, Sligo Lúb Náisiúnta, National Looped Walk

5 messages

Ann McKirdy <annmckirdy@gmail.com> Wed, May 11, 2016 at 1:07 PM
To: mcarty@sligococo.ie
Cc: jboydell@sportsireland.ie

Cc: June Boydell, National Trails and Walks

Dear Michael,

I am writing to follow up on my query yesterday regarding the Environmental Impact Report I had requested to see regarding the development of the National Looped Walk in the Special Conservation Area of Killaspugbrone. I had requested to view this report as I have seen an alarming degradation of this Special Conservation Area due to the increase in walkers since the new National Looped Walk has opened. I was very surprised and disappointed to learn that no Environmental Impact Report had been undertaken in spite of the fact that this area is designated under EU law as a Special Area of Conservation.

According to the County Sligo Development Plan 2011-2017 Natura Impact Report 2013 there are specific requirements and obligations on the County Council to ensure that no development will take place in these SAC's without appropriate assessment.(National Parks and Wildlife Service Ballysadare Bay SAC; http://www.npws.ie/protected-sites/sac/000622)

You had mentioned during our conversation that the County Council did not do anything except signpost an existing pathway. The Killaspugbrone Preservation Project contradicts this, its report states 'In 2005/2006 consultations were held with the Sligo County Council to establish which paths should be used. Grant aid and Project funds financed the erection of finger-posts on the paths and this greatly helped the protection of the dunes.' Local resident, Deirdre Foley, who is in her 80's and has lived here all her life and whose family is buried in Killaspugbrone says access to the church was always by the shore.

Sligo County Council's mandate is to protect this area, your own report has highlighted the necessity for a raised board walk if this area was to be further developed for tourism. To re state the importance of this SAC and quote from the Council's own report, 'The Department recognises that this area is entirely within the Special Area of Conservation… Fixed Dunes with Herbaceous Vegetation (Grey Dunes), which is listed as priority habitat in the EU Habitats Directive. It should also be noted, that the present degraded/modified habitat supports the species Narrow-mouthed Whorl Snail (Vertigo angustior), which is a species listed in Annex II of the EU Habitats Directive and is a qualifying feature for the Cummeen Strand/Drumcliff Bay Special Area of Conservation Site No. SAC 000627. This area also supports the protected flora species Round-leaved Wintergreen subsp. maritima (Pyrola rotundifolia maritima), which is a species listed in the Flora Protection Order, 1999 (SI No. 94 of 1999)."

I have included the recommendations from this report below. I feel it is incumbent upon the Council to ensure the biodiversity of this area is preserved and the delicate eco system is restored. Attached is a photo of the Nobbies Boardwalk in Phillip Island, Victoria, Australia, I believe a similar raised boardwalk system is required to preserve this SAC, otherwise the area will need to be closed off for rehabilitation

May 2016
Killaspugbrone

Yours sincerely,

Ann McKirdy

County Sligo Development Plan 2011-2017 Natura Impact Report 2013:

A 3 In Section 44.2 Coastal protection

'modify objective A as follows:

Prepare an integrated coastal management plan for Strandhill in consultation with relevant agencies and interested parties. This plan should address, inter alia, the existing and potential recreational uses of the area. The coastal management plan will ensure the protection of Natura 2000 sites through the Appropriate Assessment process.

A 4 In Section 44.2 Coastal protection

'modify objective D as follows:

Maintain and review dune management to include, where necessary, appropriate fencing, boardwalks and public information boards,in consultation with the National Parks and Wildlife Service of the DAHG.

A 12 - Section 44.7 Tourism development,

modify objective A as follows:

Promote the development of tourism related-infrastructure and facilities within the village in order to increase visitor numbers and to create more local employment, subject to Appropriate Assessment under the Habitats Directive.

The County Sligo Draft Biodiversity Plan

The County Sligo Draft Biodiversity Plan, Biodiversity systems (ecosystems) provide a variety of

buffering against flooding, maintenance of soil fertility, breakdown of wastes (including toxic waste), recycling of nutrients and filtering of water.

These 'free' functions are known as 'ecosystem services' or 'ecological services' and their value to us cannot be underestimated.

The value of natural wetlands, for example in reducing downstream flooding, purifying water and helping the recharge of underground aquifers, can be viewed in financial terms since these functions would all have to dealt with if the wetland was removed. Studies on this issue have shown that, for example, if a wetland is removed or drained, while it may result in short term financial gain for a private individual, *it usually results in a larger long-term financial loss for the wider community. It therefore makes financial, as well as ecological sense, not to lose these important areas in the first place.*

.

www.sligococo.ie/media/CouncilDownloads/Heritage/Draft%20Sligo%20Biodiversity%20Action%20Plan.pdf

---

Mail Delivery Subsystem <mailer-daemon@googlemail.com> Wed, May 11, 2016 at 1:08 PM
To: annmckirdy@gmail.com

Delivery to the following recipient failed permanently:

jboydell@sportsireland.ie

Technical details of permanent failure:
Google tried to deliver your message, but it was rejected by the server for the recipient domain sportsireland.ie by mail.sportsireland.ie. [80.93.29.17].

The error that the other server returned was:
550 No such person at this address"

----- Original message -----

DKIM-Signature: v=1; a=rsa-sha256; c=relaxed/relaxed;
d=gmail.com; s=20120113;
h=mime-version:date:message-id:subject:from:to:cc;
bh=mj1MzoYxjgjwMjrtLREwu6JmRVuzxOaEto0D1wmGPW4=;
b=HwecUbMCD/bKly9lk6gJePdS5bKyZCFrkTQ/wbckB45GljG/SywhocGo4ievCzbVYG
st+TsN84syxG5uyEyLwRoQPzaIjADU1ym6GrXqLYF10XQLkirewAEDn18aFcWUXprfcm
sbGqBOIuyoAAjS2jwR74+oQyDDJ8EgD281WuGyo4o5NScGY9yARK+Tqs6ZuHJx6JU3S4
RSRx6DYhGZPb9xIkxC5/RNVKu7d4i8yL9W5bWhwh4ivB/FywejjnO/jfig90WRqyExym
Fn354eutX2K6p+wNhcs9rPPlwlsIkChNXX6A7dC8Bh731sTHkOWpI7cx53YWjYvmuDZo
JysQ==
X-Google-DKIM-Signature: v=1; a=rsa-sha256; c=relaxed/relaxed;
d=1e100.net; s=20130820;
h=x-gm-message-state:mime-version:date:message-id:subject:from:to:cc;
bh=mj1MzoYxjgjwMjrtLREwu6JmRVuzxOaEto0D1wmGPW4=;
b=UfSRQVQWMY82JvhsdNIGVtxSYoyftmxIvxhYwJn8mZMbW3aEQ0qPCw5bjYbW+ZDw54
Kr1w5LD/+hEwzIx1IBO1ISS4DWvOzLuxVfdAAds7WtwgdZ8A6uyrMPUx6VwCIkFdGXQA
cpj/emSlzNrmkUuNHk24g0h5XC2tXKQ/B3sEHgctAsObNiS3kLL1UfVBK8JhQn2Ub8d4
KG1yKSMKJFze/TGo3Y2+wa1eyBtQna+ASaPlwdlnDOxGU1VFcSepdPUY74y+3q0fhKhO
wtC9s7WOl4eM4H9JyLOD88BwJSZhkMNRLEspvrprjn88stylc56N/EPnT/ntZYK2sEho
WpUQ==

b519LnTVdDmTYdH/4WCbQWMcAg==
MIME-Version: 1.0
X-Received: by 10.13.243.5 with SMTP id c5mr1561186ywf.40.1462968438973; Wed,
11 May 2016 05:07:18 -0700 (PDT)
Received: by 10.37.215.199 with HTTP; Wed, 11 May 2016 05:07:18 -0700 (PDT)
Date: Wed, 11 May 2016 13:07:18 +0100
Message-ID: <CAEY17v9iUcnTX=FUuLPMWcmSbYvNFKzNA_zdX93Yo1Gp3t8POg@mail.gmail.com>
Subject: =?UTF-8?Q?Killaspugbrone=2C_Strandhill=2C_Sligo_L=C3=BAb_N=C3=A1isi=C3=BAnta=2C_?=
=?UTF-8?Q?National_Looped_Walk?=
From: Ann McKirdy <annmckirdy@gmail.com>
To: mcarty@sligococo.ie
Cc: jboydell@sportsireland.ie
Content-Type: multipart/alternative; boundary=94eb2c0350781f6baf05328fe295
[Quoted text hidden]
----- Message truncated -----

Ann McKirdy <annmckirdy@gmail.com> Wed, May 11, 2016 at 5:06 PM
To: jboydell@sportireland.ie

Dear June,
I am forwarding the email that failed earlier due. I have also sent some photos of the trail highlighting some of the detrimental damage to the delicate ecosystem.
I will follow with photos of the signage for the area which were erected by the council.
Kind regards,
Ann
[Quoted text hidden]

Ann McKirdy <annmckirdy@gmail.com> Thu, May 12, 2016 at 1:28 PM
To: Sligo Walks <dkennedy@sligoleader.com>, cgonley@sligoleader.com, sineadmaguire@yahoo.com, dbree@eircom.net

---------- Forwarded message ----------
From: **Ann McKirdy** <annmckirdy@gmail.com>
Date: Wed, May 11, 2016 at 1:07 PM
Subject: Killaspugbrone, Strandhill, Sligo Lúb Náisiúnta, National Looped Walk
To: mcarty@sligococo.ie
Cc: jboydell@sportsireland.ie

[Quoted text hidden]

Ann McKirdy <annmckirdy@gmail.com> Tue, Jul 6, 2021 at 7:48 AM
To: Aine Nic Amhlaidh <Ainenicamhlaidh@gmail.com>

lub naisiunta
---------- Forwarded message ---------
From: **Ann McKirdy** <annmckirdy@gmail.com>
Date: Wed, May 11, 2016 at 1:07 PM
Subject: Killaspugbrone, Strandhill, Sligo Lúb Náisiúnta, National Looped Walk
To: <mcarty@sligococo.ie>
Cc: <jboydell@sportsireland.ie>

[Quoted text hidden]

Gmail

Ann McKirdy <ainenicamhlaidh@gmail.com>

FW: Killaspugbrone Special Area of Conservation - delivered by hand on 20.07.20 - resending 29.7.20

2 messages

Stephen Ward <sward@sligococo.ie> Fri, Aug 7, 2020 at 9:55 AM
To: Ann McKirdy <ainenicamhlaidh@gmail.com>

Dear Ann,

I refer to you recent correspondence in relation to the Killaspugbrone trail.

Prior to the carrying out of the works, this project was screened for the requirement for Appropriate Assessment. However, having regard to the nature and scale of the works, it was deemed that Appropriate Assessment was not required in this case.

Regards,

Stephen Ward
Senior Executive Planner

Sligo County Council

Planning Section, City Hall, Quay Street, Sligo, F91 PP44

+353-71-9114491
sward@sligococo.ie
sligococo.ie | sligo.ie

Sligo County Council
Comhairle Chontae Shligigh
Sligo.

From: Ann McKirdy [mailto:ainenicamhlaidh@gmail.com]
Sent: Wednesday 29 July 2020 23:18
To: Suzanne Siberry; Enforcement
Subject: Killaspugbrone Special Area of Conservation - delivered by hand on 20.07.20 - resending 29.7.20

Dear Suzanne and the officers of environment enforcement,

I am forwarding herewith the letter I submitted by hand delivery on the 20.7.2020 to the Senior Planners regarding the Killaspugbrone Looped Trail. I have not received a response. I would appreciate if you could follow up on my behalf.

Yours sincerely,

Ann McKirdy

Ann McKirdy <ainenicamhlaidh@gmail.com> Tue, Mar 24, 2026 at 4:00 AM
To: Ann McKirdy <ainenicamhlaidh@gmail.com>

[Quoted text hidden]

Killaspugbrone

Larass,

Strandhill,

Sligo

Date: 20/07/20

Att: Leonora McConville – Executive Planner and Stephen Ward – Senior Executive Planner

Re: Killaspugbrone Looped Trail, Lúb Naisiúnta

Dear Ms McConville and Mr Ward,

I am writing to you with regards to the Killaspugbrone Looped Trail and the proposed development of future trails in the Strandhill/Coolera area specifically the development of looped trails in or near special areas of conservation.

I have grave concerns for the damage that has been done to this sensitive site since the opening of a National Looped Trail on this Special Area of Conservation. I alerted the County Council in May 2016 of my concerns before this trail was opened upon seeing the sign for a Lúb Naisiúnta.

I have requested on numerous occasions to view the Appropriate Assessment, initially I was informed it was available to view in hard copy at the Planning Office. Subsequently I was told that this Appropriate Assessment screening had not taken place due to the fact that there was always a looped trail on this site. I have done extensive research, this is categorically not true. Even if it were true, an existing path would not constitute permission to deviate from the legal requirement to complete a Natura Impact Statement and an Appropriate Assessment on this site.

I have been sending photos on almost a weekly basis to the environment office to document the destruction of this SAC.

This issue needs urgent attention. This trail constitutes 'unauthorised development' and planning enforcement action is now required by the planning authority either locally or through An Bórd Pleanala.

I have enclosed some historic pertinent email communications to the Sligo County Council and the Appropriate Assessment guidance for planning authorities, 2009.

Yours sincerely,

_____

Ann McKirdy

Gmail

Ann McKirdy <ainenicamhlaidh@gmail.com>

looped trail letter resent 29 7 20

1 message

Ann McKirdy <ainenicamhlaidh@gmail.com> Tue, Mar 24, 2026 at 4:24 AM
To: Ann McKirdy <ainenicamhlaidh@gmail.com>

looped trail letter resent 29 7 20.docx
14K

Larass,

Strandhill,

Sligo

Date: 20/07/20

Att: Leonora McConville – Executive Planner and Stephen Ward – Senior Executive Planner

Re: Killaspugbrone Looped Trail, Lúb Naisiúnta

Dear Ms McConville and Mr Ward,

I am writing to you with regards to the Killaspugbrone Looped Trail and the proposed development of future trails in the Strandhill/Coolera area specifically the development of looped trails in or near special areas of conservation.

I have grave concerns for the damage that has been done to this sensitive site since the opening of a National Looped Trail on this Special Area of Conservation. I alerted the County Council in May 2016 of my concerns before this trail was opened upon seeing the sign for a Lúb Naisiúnta.

I have requested on numerous occasions to view the Appropriate Assessment, initially I was informed it was available to view in hard copy at the Planning Office. Subsequently I was told that this Appropriate Assessment screening had not taken place due to the fact that there was always a looped trail on this site. I have done extensive research, this is categorically not true. Even if it were true, an existing path would not constitute permission to deviate from the legal requirement to complete a Natura Impact Statement and an Appropriate Assessment on this site.

I have been sending photos on almost a weekly basis to the environment office to document the destruction of this SAC.

This issue needs urgent attention. This trail constitutes 'unauthorised development' and planning enforcement action is now required by the planning authority either locally or through An Bórd Pleanala.

I have enclosed some historic pertinent email communications to the Sligo County Council and the Appropriate Assessment guidance for planning authorities, 2009.

Yours sincerely,

_____

Ann McKirdy

Killaspug brone

Gmail

Ann McKirdy <ainenicamhlaidh@gmail.com>

Killaspugbrone Special Area of Conservation - delivered by hand on 20.07.20 - resending 29.7.20

4 messages

Ann McKirdy <ainenicamhlaidh@gmail.com> Wed, Jul 29, 2020 at 11:18 PM
To: Suzanne Siberry <ssiberry@sligococo.ie>, enforcement@sligococo.ie

Dear Suzanne and the officers of environment enforcement,
I am forwarding herewith the letter I submitted by hand delivery on the 20.7.2020 to the Senior Planners regarding the Killaspugbrone Looped Trail. I have not received a response. I would appreciate if you could follow up on my behalf.
Yours sincerely,
Ann McKirdy

2 attachments

Killaspugbrone Planning .docx
20K

looped trail letter resent 29 7 20.docx
14K

Ann McKirdy <ainenicamhlaidh@gmail.com> Tue, Jan 11, 2022 at 10:41 AM
To: "Info@opr.ie" <info@opr.ie>

21-253-11-OPR

[Quoted text hidden]

2 attachments

Killaspugbrone Planning .docx
20K

looped trail letter resent 29 7 20.docx
14K

Ann McKirdy <ainenicamhlaidh@gmail.com> Tue, Mar 24, 2026 at 4:25 AM
To: Ann McKirdy <ainenicamhlaidh@gmail.com>

---------- Forwarded message ---------
From: **Ann McKirdy** <ainenicamhlaidh@gmail.com>
Date: Wed, 29 Jul 2020 at 23:18
Subject: Killaspugbrone Special Area of Conservation - delivered by hand on 20.07.20 - resending 29.7.20
To: Suzanne Siberry <ssiberry@sligococo.ie>, <enforcement@sligococo.ie>

[Quoted text hidden]

2 attachments

Killaspugbrone Planning .docx
20K

looped trail letter resent 29 7 20.docx
14K

Ann McKirdy <ainenicamhlaidh@gmail.com> Tue, Mar 24, 2026 at 4:26 AM
To: Ann McKirdy <ainenicamhlaidh@gmail.com>

---------- Forwarded message ---------
From: **Ann McKirdy** <ainenicamhlaidh@gmail.com>
Date: Wed, 29 Jul 2020 at 23:18
Subject: Killaspugbrone Special Area of Conservation - delivered by hand on 20.07.20 - resending 29.7.20
To: Suzanne Siberry <ssiberry@sligococo.ie>, <enforcement@sligococo.ie>

[Quoted text hidden]

2 attachments

Killaspugbrone Planning .docx
20K

looped trail letter resent 29 7 20.docx
14K

Natura 2000 permits for new plans and projects

Regarding new developments in and around Natura 2000 sites, Article 6 of the Habitats Directive establishes a permitting procedure for any plans or projects that are likely to have a significant effect on one or more sites either individually or in combination with other plans and projects.

Potentially damaging projects must undergo an appropriate assessment to determine the precise nature and extent of the potential impacts on the species and habitats of EU importance present. It is then up to the competent national authorities to decide whether or not to approve the plan or project. This can only be done after they have ascertained that it will not adversely affect the integrity of that site. The onus is on proving the absence of effects rather than their presence.

Under the **Appropriate Assessment of Plans and Projects in Ireland**, Guidance for Planning Authorities -guidelines 2009.

The Birds and Habitats Directive set out various procedures and obligations in relation to nature conservation management in Member States in general and of the Natura 2000 sites and their habitats and species in particular.

A key protection mechanism, [...] is the requirement to consider the possible nature conservation implications of any plan or project on the Natura 2000 site network before any decision is made to allow that plan or project to proceed. Not only is every new plan or project captured by this requirement but each plan or project, when being considered for approval at any stage, must take into consideration the possible effects it may have in combination with other plans and projects when going through the process known as appropriate assessment.

The obligation to undertake appropriate assessment derives from Article 6(3) and 6(4) of the Habitats directive and both involve a number of steps and tests that need to be applied in sequential order. Article 6(3) is concerned with the strict protection of sites, while Article 6(4) is the procedure for allowing derogation from this strict protection in certain restricted circumstances.

The test to establish whether in relation to a particular plan or project appropriate assessment is required. This is termed AA screening. Its purpose is to determine, on the basis of a preliminary assessment and objective criteria, whether a plan or project alone and in combination with other plans or projects, could have significant effects on a Nature 2000 site in view of the site's conservation objectives. The need to apply the precautionary principle in making any key decisions in relation to the tests of AA has been confirmed by European Court of Justice case law. Therefore, where significant effects are likely, uncertain or unknown at screening stage, AA will be required.

AA is focused and detailed impact assessment of the implications of the plan or project alone and in combination with other plans and projects, on the integrity of a Natura 2000 site in view of its conservation objectives.

Date and information on the project and on the site and an analysis of potential effects on the site must be obtained and presented in a Natura Impact Statement.

Ecological experts will be required to undertake the surveys, research and analysis with input from other experts as necessary to prepare the Natura Impact Statement. It is the responsibility of the proponent of the plan or project to have the NIS Prepared for submission to the competent authority.

If it can be concluded on the basis of AA that there will be no adverse effects on the integrity of a Natura 2000 site, the plan or project can proceed to authorisation , where the normal planning or other requirements will apply in reaching a decision to approve or refuse.

The duty to undertake AA, having considered the NIS, and to ensure that the stringent evaluation and decision making procedure is applied correctly lies with the competent authority.

2.3 Likely to have significant effect thereon.

Any plan or project that is not directly connected with or necessary to the management of a site must be subject to AA of its implications for the Natura 200 site in view of the site's conservation objectives 'if it cannot be excluded, on the basis of objective information, it will have a significant effect on that site, either individually or in combination with other plans or projects.' (EC 2006.

The precautionary principle, derived from the EU Treaty and developed in the case law of the ECJ, is one of the foundations of the high level of protection pursued by EU community policy on the environment and underpins the Habitats Directive. Where doubt exists about the risk of significant effect, an AA must be carried out. In assessing the risk of such effects, the significance must be established in the light of, among other things, the characteristics and specific environmental conditions of the site concerned, and the likely effects of the plan or project.

If a plan or project is likely to undermine any of the site's conservation objectives (i.e. objectives that relate to the Birds of Habitats Directives) it must be considered likely to have a significant effect on that site (ED 2006).

Appropriate Assessment.

The requirements for AA derive directly from Article 6(3). AA is an impact assessment process that fits within the decision -making framework and tests of Articles 6(3) and 6(4) and, for the purposes of this guidance, it comprises two main elements. Firstly a Natura Impact Statement (NIS) – a statement of the likely and possible impacts of the plan or project on the Natura 2000 site must be prepared. This comprises a comprehensive ecological impact assessment of a plan or project, it examines the direct and indirect impacts that the plan or project might have on tis own or in combination with other plans and projects, on one or more Natura 2000 sites in view of the sites' conservation objectives.

Secondly, the competent authority carries out the AA, based on the NIS and any other information it may consider necessary.

The AA process encompasses all of the processes covered by Article 6(3) of the Habitats Directive i.e. the screening process, the NIS, the AA by the competent authority an the record of decisions made by the competent authority and the record of decisions made by the competent authority at each stage of the process, up to the point at which article 6(4) may come into play following a determination that a plan or project may adversely affect the integrity of a Natura 2000 site.

2.6 Competent National Authorities

The competent authorities in Ireland are the national, regional or local authorities that are charged with or responsible for consenting, authorising, adoption or deciding to proceed with a plan or project.

It is the competent authority's responsibility to obtain the information to enable it to screen a plan or project for AA and if required obtain from the proponent of the plan or project the NIS. If the project is being proposed by a competent authority itself, the competent authority will be responsible for the production of the NIS.

The competent authority is then responsible for carrying out AA and for maintaining a compete audit trail of the AA process.

Gmail

Ann McKirdy <ainenicamhlaidh@gmail.com>

Unprecedented

1 message

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

Tue, Mar 24, 2026 at 4:05 AM


NOTICE
Due to the popularity of this loop walk, some remedial works will be ongoing for some time. Please follow the new path lines and observe the directional signage.
It is important to stay clear of the Runway strip at all times. Thank you for your co-operation.

Aine

●●●●○ vodafone IE 00:07 1%
eventbrite.ie

Killaspugbrone Looped Walk Launch

by Sligo Tourism Development Association

Thursday, 9 April 2015 at 14:30
Sligo Airport
Airport Rd, Strandhill
Strandhill, Sligo IE

Ticket sales have ended.

Event Details

Launch of this stunning family-friendly coastal walk through the North of the dune system in the busy seaside village of Strandhill. The trail brings walkers through a variety of coastal habitats including sand dunes, salt marsh and pine woodland. It passes by Killaspugbrone Church, an early Christian site with historic and legendary associations. The route features some magnificent views of Benbulben and Knocknarea and out over Sligo Bay.
From the promenade at the sea-front, the trail leads the walker in a loop along the shore line, past the airport run-way, over to Killaspugbrone and back to the village via Dorrins Strand. There are longer and shorter options along the route – including the 'Via headland' route which takes the walker along the exposed Killaspug point, which is 6.8km in total or

the shorter option along the end of the run-way (6.2km in total)

This project was undertaken by Sligo Tourism Development Association with funding from Sligo

04:05 4G 87

Strandhill - Killaspugbrone

12 May 2016 18:52



Gmail

Ann McKirdy <annmckirdy@gmail.com>

Looped trail Strandhill

4 messages

Flooded Killaspugbrone looped Trail Councillor Declan Breen's response

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

Sat, Apr 29, 2017 at 12:40 AM

6 attachments



IMG_0697.JPG
540K



IMG_0698.JPG
560K

Flooded
Killaspugbrone
Loop Trail
Carrigallen Leitrim Ireland

Flooded
Killaspugbrone
2017



IMG_0708.JPG
503K



IMG_0709.JPG
452K



IMG_0713.JPG
614K



IMG_0714.JPG
642K

Ann McKirdy <annmckirdy@gmail.com> Sat, Apr 29, 2017 at 12:54 AM
To: Declan Bree <dbree@eircom.net>

Dear Declan,
I hope all is well. I want to bring to your attention the problem I and other users of the Killaspugbrone Looped Trail encountered this evening. Upon exiting the woods near The Lodge on the trail by the airstrip the Dorrins Strand path was completely impassible. It was flooded by high tide for as far as the eye could see. I have attached photos of both access points to this path.
We were left with no option but to climb the 10 ft vertical 'private' gate as the entire length of the area was fenced by a tall 10-11 ft fence with a 1ft overhang and barbed wire on top.
The gate we climbed is as far as I am aware a former disputed 'right of way'.
I believe this is a big problem for users of this trail which at certain times with high tides is dangerously and unpredictably impassible. It was almost dusk when we came upon this, it would have been too dark to return to Strandhill on an unlit and uneven pathway.
I have an additional photo I will send separately.
I would appreciate it if you could let me know if this is something you can bring to the council's attention on behalf of the community.
Many thanks,
kind regards,
Ann McKirdy

On Sat, Apr 29, 2017 at 12:40 AM, Ann McKirdy <annmckirdy@me.com> wrote:

Declan Bree <dbree@eircom.net>
To: Ann McKirdy <annmckirdy@gmail.com>

Sat, Apr 29, 2017 at 7:02 PM

Dear Ann

Thank you for your email.

I would assume that the Council is aware that high tides affect the area in question occasionally.

I suppose that the price one pays when a walkway is provided adjacent to the shore.

Kind regards

DECLAN

D. Bree
Sligo Elected Councillor
Shocking !

The Price one pays !

[Quoted text hidden]
[Quoted text hidden]

Ann McKirdy <annmckirdy@gmail.com> Sat, Jan 8, 2022 at 2:16 PM
To: Aine Nic Amhlaidh <Ainenicamhlaidh@gmail.com>

[Quoted text hidden]

Sligo County Council

Strandhill Public Realm Enhancement Appropriate Assessment Screening

Final report
February 2025

LUC

Luc Appropriate Assessment

Exhibit C

Excellent

Info on Guiding Principles of EU Law.

(1) legal error in screening the WWTP. This AA Luc screening fails to account for the incombination effects by excluding the WWTP & the Killaspugbrone looped Trail

(2) Breach of Precautionary Principle under EU Law Case C-258/11 if doubt exists

(3) Failure of Assessment Contradicts OPR Practice Note PN01 and NPWS Guidance 2009 - failing to identify Zone of Influence for Public Realm

Sligo County Council

Strandhill Public Realm Enhancement
Appropriate Assessment Screening

Version	Status	Prepared	Checked	Approved	Date
1.	Draft for comment – outstanding design / delivery matters highlighted	EM, LB, SS	DG, SS	LT	02.06.2022
2.	Draft 02 for comment	EM, SS	DG	LT	21.06.2022
3.	Issue – integrating final consultation and client/design team comments	EM	SS	LT	04.02.2023
4.	For Planning	CC	LT	LT	24.04.2024
5.	For planning	cc	LT	LT	07.02.2025

Bristol
Cardiff
Edinburgh
Glasgow
London
Manchester

landuse.co.uk

Land Use Consultants Ltd
Registered in England
Registered number 2549296
Registered office:
250 Waterloo Road
London SE1 8RD

100% recycled paper

Landscape Design
Strategic Planning & Assessment
Development Planning
Urban Design & Masterplanning
Environmental Impact Assessment
Landscape Planning & Assessment
Landscape Management
Ecology
Historic Environment
GIS & Visualisation

FS566056
EMS566057
OHS627041

Landscape Institute Registered Practice

Contents

Chapter 1
Introduction 1

Aims 1
Project Overview 2
Habitats Directive Assessment: An Overview 2
Part 8 Planning Applications: An Overview 2
Structure of Report 2

Chapter 2
Legislative Context 3

Legislation 3
Guidance Documents 6

Chapter 3
Assessment Methodology 8

Purpose 8
Consultation 8
The Four Stages of Habitats Directive Assessment: An Overview 9
Screening Assessment Method 10
Screening Conclusion Statement 13

Chapter 4
Project Description and Site Context 14

Project Objectives 14
Direct Connection with, or Necessary to, Conservation Management of European Site 14
Project Locations and Site Context 15
Proposed Development Works 15

Chapter 5
Identification of Relevant European Sites 17

Chapter 6
Assessment of Likely Significant Effects 19

Direct and Indirect Impacts of Public Realm Enhancements at Strandhill 19
Consideration of Climate Change 20
Potential Effects on European Sites 21

Chapter 7
Screening Conclusions 32

Screening Conclusion Statement 32

Appendix A
Development Design Drawings A-1

Appendix B
Identification of Relevant European Sites B-2

Chapter 1
Introduction

Aims

1.1 LUC has been appointed by Sligo County Council to provide an Appropriate Assessment (AA) Screening report in support of the Part 8 application public realm enhancement at Strandhill.

1.2 The scheme will re-address the balance between vehicles and pedestrians for current user levels and to improve the character, views and heritage of the coastal village. The project is currently going through preliminary RIBA Stage 3 design, which incorporates the design layout and surface finishing. The Planning Section aim to commence a Part 8 consultation process later in 2025. Further refinement of design will follow, subsequent to the planning process.

1.3 Under the European Communities (Birds and Natural Habitats) Regulations 2011 (as amended) and the Planning and Development Act (as amended), it is a requirement that before planning consent can be granted, each project submitted must undergo assessment of its implications on any European site. This process is referred to as Habitats Directive Assessment. The full assessment process includes four stages, of which Appropriate Assessment (AA) Screening is the first.

1.4 This Screening report is based on current design information.

1.5 The aims of this report are to:

- Assess the potential for the public realm enhancement works to incur likely significant adverse effect/s on the qualifying interests[1] of Special Areas of Conservation (SAC)[2] and Special Protection Areas (SPA)[3] within the zone of influence, either alone or in-combination;
- Collate all Screening information for the competent authority to determine whether full Assessment will be required to test whether the works proposed will adversely affect the integrity of European Sites either alone or in-combination;

[1] 'Qualifying Interests' relate to the habitats and/or (non-bird) species for which an SAC or SPA is selected. Specifically, 'Special Conservation Interests' relate to bird species for which an SPA is selected. For the purposes of this report, the term 'qualifying interest' is used collectively to all.

[2] Including candidate SAC (cSAC)

[3] Including proposed SPA (pSPA)

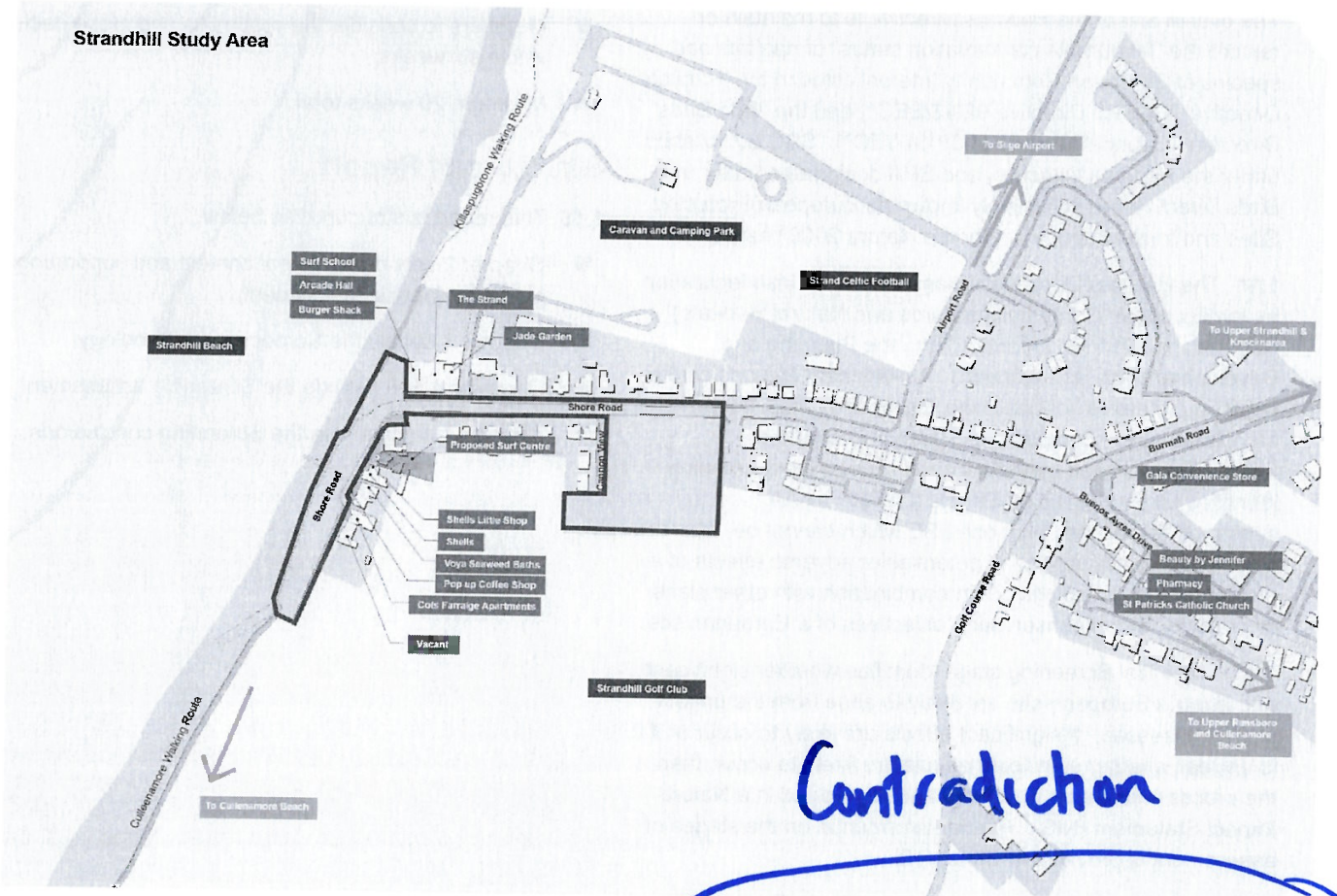
- Inform evolving project designs in accordance with the mitigation hierarchy.

1.6 This report has been prepared by Ellie Mayhead, BSc (Hons) and Lucy Beagley BA (Hons) MSc. Reviews were completed by Sofie Swindlehurst BSc (Hons) MSc MCIEEM CEnv and David Green BSc (Hons) MCIEEM in accordance with the internal Quality Assurance procedures of LUC.

Project Overview

1.7 Strandhill village lies within Sligo Bay. The 1.75ha project area is located at OSiGR: G 60357 35875. It sits on the shore front promenade of Sligo Bay extends along Shore Road, from the existing shore front parking to the council car park (see Figure 1.1). The project area comprises existing hardstanding (highway, pavement and car parking). No vegetated habitats currently occur within the red line boundary.

Figure 1.1: Strandhill public realm enhancements site location plan



Contradiction

1.8 Proposed public realm enhancement seek to:

- Maintain patterns of pedestrian movement without conflict with motor vehicles;
- Enhance legibility, connectivity and movement through consistent use of materials, signage and wayfinding;
- Create a series of connected high quality public realm spaces that cater for different users including families and people of all ages; and
- Create a public realm that responds to the challenges of climate change including provision of Sustainable Drainage Systems (SuDS) and vegetation to improve air quality and temperature regulation.

1.9 Sligo Bay supports three estuaries that are designated as the following European Sites:

Manager's Report

- Ballysadare Bay SAC and SPA to the south of the project area (130m at the closest point);
- Cummeen Strand SPA and Cummeen Strand/ Drumcliff Bay SAC to the north (320m at the closest point); and
- Drumcliffe Bay SPA in the north of Sligo Bay (5.7km north of the project area).

Habitats Directive Assessment: An Overview

1.10 The European Habitats Directive provides legal protection for habitats and species of European importance. The overall aim of the Habitats Directive is to maintain or restore the "favourable conservation status" of habitats and species of European Community Interest listed in the 'Habitats Directive' (Council Directive 92/43/EEC[4]) and the 'Wild Birds Directive '(Council Directive 2009/147/EC[5]). SAC established under the Habitats Directive, and SPA designated under the Birds Directive are collectively known as European Protected Sites and form a framework for the Natura 2000[6] network.

1.11 The Habitats Directive is transposed into Irish legislation by the European Communities (Birds and Natural Habitats) Regulations 2011 (as amended) and the Planning and Development Act (as amended). Assessment focuses on the qualifying interests[7] of qualifying (European) sites. It is completed by the competent authority[8], informed by information provided by the applicant. The initial Screening identifies Likely Significant Effects (LSE). Full AA subsequently focuses on those LSE which cannot be screened out, assessing the potential for adverse effects of a plan or project, in isolation or in-combination with other plans or projects, on the conservation objectives of a European site.

1.12 The initial Screening stage identifies whether significant effects on a European site are likely to arise from the project or plan assessed. If significant effects are likely to occur or if it is unclear whether significant effects are likely to occur, then the process moves on to full AA, and is reported in a Natura Impact Statement (NIS). Further information on the stages of assessment is provided in Chapter 3.

1.13 AA is an iterative design process with application of the mitigation hierarchy to avoid impacts at source. If impacts are not avoided by alterations in design or construction process, then mitigation must be applied.

Part 8 Planning Applications: An Overview

1.14 The Part 8 process includes several stages as follows:

- Public consultation – minimum six weeks (four weeks public display plus two weeks for submissions to be accepted);
- Chief Executive report to be submitted to the Members of Sligo County Council within eight weeks (unless modifications/variations are to be made);
- Members to consider the proposals and make decision – within six weeks;
- Minimum 20 weeks total.

Structure of Report

1.15 This report is structured as below.

- Chapter 2 sets out the legal context and supporting guidance for this assessment;
- Chapter 3 details the Screening methodology;
- Chapters 4 to 6 provide the Screening assessment.
- Chapter 7 summarises the Screening conclusions.

[4] Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora, available: https://ec.europa.eu/environment/nature/legislation/habitatsdirective/index_en.htm

[5] Council Directive 2009/147/EC on the Conservation of Wild Birds, available: https://ec.europa.eu/environment/nature/legislation/birdsdirective/index_en.htm

[6] Pan-European network of all sites designated under the Habitats and Birds Directives, to which the requirements for appropriate assessment under Article 6(3) of the Habitats Directive apply.

[7] The designation features of SACs are referred to as **Qualifying Interests (and the designation features of SPAs are referred to as Special Conservation Interests** which comprise bird species as well as wetland bird habitats. The term **'qualifying interests' will however** be used throughout this report for simplicity to encompass both.

[8] The 'competent authorities' are those charged with or responsible for consenting, authorising, adopting or deciding to proceed with a plan or project; typically considered to be the planning authorities and An Bord Pleanála (Irish Planning Appeals Board).

Chapter 2
Legislative Context

2.1 This Screening report is based on best scientific knowledge and has utilised ecological expertise. It follows the approach outlined in current legislation and case law, guidance documents and Departmental Circulars as set out below.

Legislation

European Legislation

2.2 The 'Habitats Directive'[9] (Directive 92/43/EEC) is the principal legislative instrument for the protection and conservation of biodiversity within the European Union and lists certain habitats and species that must be protected within wildlife conservation areas. The 'Birds Directive'[10] (Directive 2009/147/EC) provides for a network of sites within the European Union which protect birds at their breeding, feeding, roosting and wintering areas. The Habitats Directive and the Birds Directive form the cornerstone of Europe's nature conservation policy.

2.3 The requirement for AA is set out in Articles 6(3) and 6(4) of the Habitats Directive (92/43/EEC) which states:

"…Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives. In the 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…"

National Legislation and Case Law

2.4 The Habitats Directive and the Birds Directive are transposed into Irish legislation by the European Communities (Birds and Natural Habitats) Regulations 2011[11], and Part

[9] Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora. Available at: https://ec.europa.eu/environment/nature/legislation/habitatsdirective/index_en.htm

[10] Council Directive 2009/147/EC on the Conservation of Wild Birds. Available at: https://ec.europa.eu/environment/nature/legislation/birdsdirective/index_en.htm

[11] S.I. No. 477 of 2011 – European Communities (Birds and Natural Habitats) Regulations 2011

XAB of the Planning and Development Act 2000, as amended[12].

2.5 This AA Screening Report has been prepared with regard to relevant rulings by the Court of Justice of the European Union (CJEU), the High Court, and the Supreme Court, including but not limited to the following rulings. The rulings have been grouped into relevant topics.

Interpretation of 'Likely Significant Effect' (LSE)

- *European Court of Justice 7th September 2004 by Advocate General Kokott; Case C-127/02 Waddenzee -v- Secretary of State for Agriculture, Nature Conservation and Fisheries* – The CJEU ruled on the interpretation of Article 6(3) of the Habitats Directive:
  - An effect should be considered 'likely', if it cannot be excluded, on the basis of objective information, that it will have a significant effect on a European site.
  - An effect should be considered 'significant', if it undermines the conservation objectives of a European site.
  - Where a plan or project has an effect on a site but is not likely to undermine its conservation objectives, it cannot be considered likely to have a significant effect on a European site.

Interpretation of Direct, Indirect and In-combination Effects

- *European Court of Justice Opinion 22nd November 2012 by Advocate General Sharpston; Case C-258/11 Peter Sweetman and Others-v- An Bord Pleanála* – The CJEU ruled that in determining whether a project or plan has an adverse effect on the integrity of a site (to which Article 6(3) of the Habitats Directive applies), an effect which is permanent or long lasting must be regarded as an adverse effect.
- *European Court of Justice 7th November 2018; Case C 461/17; Holohan & Others v. An Bord Pleanála* – The CJEU ruled that:
  - All the habitats and species for which a European site is protected must be catalogued.
  - An AA must identify and examine the implications of the proposed project for species present on the European site, including species for which the site has been listed and those for which it has not, provided those implications are liable to affect the conservation objectives of the site.
  - An AA must identify and examine the implications of the proposed project for species and habitats outside the boundaries of the European site, provided those implications are liable to affect the conservation objectives of the site.
- *High Court Ruling 2nd December 2020 by Mr. Justice Denis McDonald; Neutral Citation [2020] IEHC 622; High Court Record No. 2020 238 JR; Highlands Residents Association and Protect East Meath Limited -v- An Bord Pleanála, Ireland and The Minister For Culture Heritage and The Gaeltacht, Ireland and The Attorney General* – The High Court ruled that An Bord Pleanála (the competent authority) erred in law in screening out (in the course of the Stage 1 screening exercise carried out by the competent authority) the possibility of significant effects on four European sites in relation to potential risk arising from the mobilisation of silt and pollutants from the development site in this particular Strategic Housing Development application, where the relevant application documentation (Environmental Impact Assessment Report, AA, Construction Environmental Management Plan) referenced protection of the River Boyne within the context that the proposed development site has a relatively close hydrological connection to the four relevant European sites.

Application of the Precautionary Principle

- *European Court of Justice Judgement 11th April 2013 by the Third Chamber; Case C-258/11 Peter Sweetman and Others -v- An Bord Pleanála* - The CJEU ruled that Article 6(3) of the Habitats Directive must be interpreted as meaning that a project not directly linked to it is not immediately necessary for the management of a site to prejudice the integrity of that site if it is likely to prevent the preservation of the constituent characteristics of the site concerned in relation to the presence of a natural priority habitat whose purpose is to maintain gave the reason for registering that site in the list of sites of Community importance within the meaning of that directive. Therefore, the precautionary principle must be applied throughout.

Application of Mitigation / 'Best Practice Measures'

- *European Court of Justice Judgement 12th April 2018 by the Seventh Chamber; Case C 323/17; People Over Wind & Sweetman -v- Coillte Teoranta* - The CJEU ruled that measures intended to avoid or reduce the harmful effects of a proposed project on a European site may no longer be taken into account by competent authorities at

[12] Planning and Development Act 2000, as amended

the Stage 1 screening stage when judging whether a proposed plan or project is likely to have a significant effect on the integrity of a European designated site.

- *European Court of Justice 19th April 2018; Case C 164/17; Grace & Sweetman -v- An Bord Pleanála* – The CJEU ruled there is a "*distinction to be drawn between protective measures forming part of a project and intended [to] avoid or reduce any direct adverse effects that may be caused by the project in order to ensure that the project does not adversely affect the integrity of the area, which are covered by Article 6(3), and measures which, in accordance with Article 6(4), are aimed at compensating for the negative effects of the project on a protected area and cannot be taken into account in the assessment of the implications of the project*". The CJEU held that it is only when it is sufficiently certain that a measure will make an effective contribution to avoiding harm, guaranteeing beyond all reasonable doubt that the project will not adversely affect the integrity of the area, that such a measure may be taken into consideration when the appropriate assessment is carried out under Article 6(3). Article 6 of the Habitats Directive must be interpreted as meaning:

  "Where it is intended to carry out a project on a site designated for the protection and conservation of certain species, of which the area suitable for providing for the needs of a protected species fluctuates over time, and the temporary or permanent effect of that project will be that some parts of the site will no longer be able to provide a suitable habitat for the species in question, the fact that the project includes measures to ensure that the part of the site that is likely to provide a suitable habitat will not be reduced and may actually be enhanced may not be taken into account for the purpose of the appropriate assessment under Article 6(3)."

- *High Court Ruling 2nd February 2019 by Mr. Justice Barniville; Neutral Citation [2019] IEHC 84; High Court Record No. 2017 883 JR; Kelly -v- An Bord Pleanála & Anor*- The High Court ruled that Sustainable Drainage Systems (SuDS) are not mitigation measures which a competent authority is precluded from considering at the Stage 1 Screening stage.

- *High Court Ruling 21st June 2019 by Mr. Justice Simons; Neutral Citation [2019] IEHC 450; High Court Record No. 2019 20 JR; Heather Hill Management Company clg & anor -v- An Bord Pleanála & Anor* – The High Court ruled that a competent authority is not entitled to rely on 'best practice measures' for the purposes of a Stage 1 screening determination where the legal test is whether measures are intended to avoid and/or reduce a potential harmful effect on a European site.

- *High Court Ruling 31st January 2020 by Mr. Justice Denis McDonald; Neutral Citation [2020] IEHC 39; High Court Record No. 2019 33 JR; Peter Sweetman -v- An Bord Pleanála , Ireland and The Attorney General* – The High Court ruled that the competent authority was not entitled to take the measures described in the Construction Environmental Management Plan (CEMP) to protect the Blackwater River SAC into account in carrying out the Screening exercise in this particular solar farm development case.

Appropriate Assessment

- *High Court Ruling 25th July 2014 by Ms. Justice Finlay Geoghegan; Neutral Citation [2014] IEHC 400; High Court Record No. 2013 802 JR; Kelly -v- An Bord Pleanála* – The Hight Court ruled that for Assessment to be lawfully conducted it:
  - Must identify, in the light of the best scientific knowledge in the field, all aspects of the plan or project which can, by itself or in-combination with other plans or projects, affect a European site in the light of its conservation objectives. This requires both examination and analysis.
  - Must contain complete, precise and definitive findings and conclusions and may not have lacunae or gaps. The requirement for precise and definitive findings and conclusions appears to require analysis, evaluation and decisions. Further, the reference to findings and conclusions in a scientific context requires both findings following analysis and conclusions following an evaluation each in the light of the best scientific knowledge in the field.
  - May only include a determination that the proposed development will not adversely affect the integrity of any relevant European site where upon the basis of complete, precise and definitive findings and conclusions made the Board decides that no reasonable scientific doubt remains as to the absence of the identified potential effects.

- *High Court Ruling 25th February 2016 by Mr. Justice Barton; Neutral Citation [2016] IEHC 134; High Court Record No. 2013 450 JR; Balz & Heubach -v- An Bord Pleanála* – The High Court ruled that an assessment made under Article 6(3) of the Habitats Directive cannot be regarded as appropriate if it contains gaps and lacks complete, definitive and precise findings, and conclusions capable of removing all reasonable scientific doubt as to the effects of the plan or project on a European site.

- *Supreme Court Ruling 17th July 2018 by Mr Justice Clarke; Neutral Citation [2018]; Supreme Court Record No. 2014/488 JR; Connelly -v- An Bord Pleanála* – The Supreme Court ruled with the decision of the High Court that An Bord Pleanála (ABP)had breached its obligations regarding the recording of the Screening stage, the AA itself and the EIA in its decision to g rant planning permission for the wind farm. The AA was found to be invalid due to the failure of ABP to ma ke complete, precise and specific scientific findings which justified its conclusion . The Supreme Court found that thedecision by ABPnor the materials referred to in ABP's decision could be *"shown to contain the sort of complete, precise and definitive findings which wou ld underpin a conclusion that no reasonable scientific doubt remained as to the absence of any identified potential detrimental effects on a protected site having regard to its conservation objectives"*.
- *European Court of Justice 7th November 2018; Case C 461/17; Holohan & Others v. An Bord Pleanála* – The CJEU ruled that:
  - where the competent authority rejects the findings in a scientific expert opinion recommending that additional information be obtained, Assessment must include an explicit and detailed statement of reasons capable of dispelling all reasonable scientific doubt concerning the effects of the wo rk envisaged on the site concerned.

Developer's Responsibilities

- *European Court of Justice 7th November 2018; Case C 461/17; Holohan & Others v. An Bord Pleanála* – The CJEU ruled that:
  - the competent authority may grant consent for a plan or project that leaves the developer free to determine certain parameters relating to the construction phase, such as the location of the construction compound and haul routes, if the competent authority is certain (i.e., no reasonable scientific doubt) that the development consent granted establishes conditions that are strict enough to guarantee that those parameters will not adversely affect the integrity of the site.
  - Article 5(1) and (3) of, and Annex IV to, Directive 2011/92/EU of the European Parliament and of the Council of 13 December 2011 on the assessment of the effects of certain public and private projects on the environment, must be interpreted as meaning that the developer is obliged to supply informatio n that expressly addresses the significant effects of its project on all species identified in the statement that is supplied pursuant to those provisions.
  - Article 5(3)(d) of Directive 2011/92/EU must be interpreted as meaning that the developer mu st supply information in relation to the environme ntal impact of both the chosen option and of all the main alternatives studied by the developer, together with the reasons for his choice, taking into account a t least the environmental effects, even if such an alternative was rejected at an early stage.

G uidance Documents

2.6 This Screening Report has been prepared with regard to the following European and national guidance documents. The list is ordered by publication date.

European

- Assessment of plans and projects in relation to Natura 2000 sites - Methodological guidance on of Article 6(3) and (4) of the Habitats Directive 92/43/EEC[13]
- Guidance document on the strict protection of animal species of Community interest under the Habitats Directive[14]
- Managin gNatura 2000 sites: The provisions of Article 6 of the' Habitats' Directi ve92/43 /EEC[15]
- Commission guidance on streamlining environmental assessments conducted under Article 2(3) of the Environmental Impact Assessment Directive (Directive 2011/92/EU, as amended by Directive 2014/52/EU)[16]

[13] European Commission (2021) Assessment of plans and projects in relation to Natura 2000 sites - Methodological guidance on of Article 6(3) and (4) of the Habitats Directive 92/43/EEC (pdf) Available at: https://ec.europa.eu/environment/nature/natura2000/management/pdf/methodological-guidance_2021-10/EN.pdf

[14] European Commission (2021) Guidance document on the strict protection of animal species of Community interest under the Habitats Directive (online) Available at: https://op.europa.eu/en/publication-detail/-/publication/a17dbc76-2b51-11ec-bd8e-01aa75ed71a1/language-en/format-PDF/source-search

[15] European Commission (2018) Managing Natura 2000 sites: The provisions of Article 6 of the 'Habitats' Directive 92/43/EEC (online) Available at: https://op.europa.eu/en/publication-detail/-/publication/11e4ee91-2a8a-11e9-8d04-01aa75ed71a1

[16] European Commission (2016) Commission guidance document on streamlining environmental assessments conducted under Article 2(3) of the Environmental Impact Assessment Directive (Directive 2011/92/EU, as amended by Directive 2014/52/EU) (online) Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv%3AOJ.C_.2016.273.01.0001.01.ENG&toc=OJ%3AC%3A2016%3A273%3ATOC

- Guidance document on Article 6(4) of the 'Habitats Directive' 92/43/EEC. Clarification of the Concepts of: Alternative Solutions, Imperative Reasons of Overriding Public Interest, Compensatory Measures, Overall Coherence, Opinion of the Commission[17]
- Communication from the Commission on the precautionary principle[18]

National

- OPR Practice Note PN01: Appropriate Assessment Screening for Development Management[19]
- Guidance on the strict protection of certain animal and plant species under the Habitats Directive in Ireland[20]
- Appropriate Assessment of Plans and Projects in Ireland - Guidance for Planning Authorities[21]
- Circular NPW 1/10 & PSSP 2/10. Appropriate Assessment under Article 6 of the Habitats Directive: Guidance for Planning Authorities[22].
- Circular SEA 1/08 & NPWS 1/08. Appropriate Assessment of Land Use Plans[23].
- Circular PD 2/07 & NPWS 1/07. Compliance conditions in respect of developments requiring (1) Environmental Impact Assessment (EIA); or (2) having potential impacts on Natura 2000 sites[24].

[17] European Commission (2007) Guidance document on Article 6(4) of the 'Habitats Directive' 92/43/EEC. Clarification of the Concepts of: Alternative Solutions, Imperative Reasons of Overriding Public Interest, Compensatory Measures, Overall Coherence, Opinion of the Commission (pdf) Available at: https://ec.europa.eu/environment/nature/natura2000/management/docs/art6/guidance_art6_4_en.pdf

[18] European Commission (2000) Communication from the Commission on the precautionary principle (online) Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A52000DC0001

[19] Office of the Planning Regulator (2021) Appropriate Assessment Screening for Development Management OPR Practice Note PN01 (pdf) Available at: https://www.opr.ie/wp-content/uploads/2021/03/9729-Office-of-the-Planning-Regulator-Appropriate-Assessment-Screening-booklet-15.pdf

[20] Department of Housing, Local Government and Heritage (2021) Guidance on the strict protection of certain animal and plant species under the Habitats Directive in Ireland (pdf) Available at: https://www.npws.ie/sites/default/files/files/strict-protection-of-certain-animal-and-plant-species.pdf

[21] Department of Environment, Heritage and Local Government (2009, revised 2010) Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities (pdf) Available at: https://www.npws.ie/sites/default/files/publications/pdf/NPWS_2009_AA_Guidance.pdf

[22] Department of Environment, Heritage and Local Government (2010) Circular NPW 1/10 & PSSP 2/10. Appropriate Assessment under Article 6 of the Habitats Directive: Guidance for Planning Authorities (pdf) Available at: https://www.npws.ie/sites/default/files/general/Circular%20NPW1-10%20%26%20PSSP2-10%20Final.pdf

[23] Department of Environment, Heritage and Local Government (2008) Circular SEA 1/08 & NPWS 1/08 Appropriate Assessment of Land Use Plans (pdf) Available at: https://www.npws.ie/sites/default/files/general/circular-sea-01-08.pdf

[24] [24] Department of Environment, Heritage and Local Government (2007) Circular PD 2/07 & NPWS 1/07. Compliance conditions in respect of developments requiring (1) Environmental Impact Assessment (EIA); or (2) having potential impacts on Natura 2000 sites. (pdf) Available at: https://www.npws.ie/sites/default/files/general/circular-pd-02-07.pdf

Chapter 3
Assessment Methodology

Purpose

3.1 The function of this Screening assessment is to determine the potential of the public realm enhancements at Strandhill to result in LSEs that could undermine the conservation objectives of European sites either alone or in-combination with other plans or projects. It has been undertaken to comply with the requirements of the Habitats Directive Article 6(3).

3.2 The following NPWS Generic Conservation Objectives have been considered in the Screening:

- For SACs, to maintain or restore the favourable conservation condition of the Annex I habitat(s) and/or the Annex II species for which the SAC has been selected; and
- For SPAs, to maintain or restore the favourable conservation condition of the bird species listed as Special Conservation Interests for this SPA. Where available, Site-Specific Conservation Objectives (SSCOs) designed to define Favourable Conservation Status (FCS) for a particular habitat[25] or species[26] at that site have been considered.

Consultation

Pre-application

3.3 To inform this Screening report, consultation with the Council Heritage Officer and Executive Planner was opened in January 2022 to agree the outline scope of the Screening and any key concerns or design considerations at this early stage. Determination of whether a Construction Environment Management Plan (CEMP) would be required as additional mitigation to avoid LSE was highlighted as fundamental to the outcome of the Screening and whether, accordingly, full Assessment would be required. As the promenade at Strandhill overtops during storm conditions, the requirement to

[25] FCS of a habitat is achieved when: its natural range, and area it covers within that range, are stable or increasing; the specific structure and functions which 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.

[26] FCS of a species is achieved when: population dynamics data on the species concerned indicate that it is maintaining itself on a long-term basis as a viable component of its natural habitats; the natural range of the species is neither being reduced nor is 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

consider climate change within the proposed design was also highlighted.

3.4 Additional consultation with the Executive Planner and engineer responsible for drainage and design at the shore front promenade provided further detail on any interface with / the existing wall that separates the shore front promenade from the natural coastline, and regarding drainage (including risk of pollution, silt-laden run off and seawater overtopping). Whilst the modes of transport – from vehicular to active (pedestrian and cycling) forms a key driver to the project, the forecasted number of users (local and visitors) was confirmed to be 'no net change'.

3.5 Consultation with NPWS Northern Region (Department of Housing, Local Government and Heritage) was opened in April 2022 to introduce the project to the Western Division Ecologists. Discussion on 05 July[27] was held to (i) present the development in context of existing infrastructure (ii) agree the Zone of Influence (ZoI) distances used in the assessment, and (iii) outline the principal conclusions. The following key points were also raised:

- General recommendation to 'future proof' the scheme against the implications of a changing climate, notably the opportunity to maximise SuDS and porous surfaces within the scheme was strongly encouraged by NPWS.
- Whilst it was recognised that the proposed works are not predicted to increase recreational use, historic pressure on the SAC and SPA through use of informal paths was highlighted as a concern.
- Importance for sensitive lighting design, with particular attention to avoid light spill and glare from high intensity LED sources. Recommendation for design to utilise the amber light spectrum and light levels capped in accordance with current best practice.
- Considering broader benefit to biodiversity, use of a locally appropriate species-rich planting was recommended, informed by relevant local Biodiversity Action Plan actions[28]. Examples include:
  - Native boundary hedgerows to include a range of species that offer roosting and foraging opportunities for the urban bird assemblage;
  - Tree planting of locally-appropriate species such as hawthorn, elder and willows.

The Four Stages of Habitats Directive Assessment: An Overview

3.6 Assessment is a four-stage process with tests at each stage, as summarised in Table 3.1. An important aspect of the process is that the outcome at each successive stage determines whether a further stage in the process is required.

3.7 This report delivers the Stage 1 Screening.

Table 3.1: The four stage Habitats Directive Assessment process

Stage	Process	Output
Stage 1: Screening	Identifies whether the proposed project is directly connected to, or necessary for, the management of a European site(s). Identifies whether the project may have significant impact/s upon European site/s. either alone or in-combination with other plans or projects.	The output from this stage is a determination of not significant, significant, potentially significant, or uncertain effects. The latter three determinations will cause the project to be brought forward to Stage 2.
Stage 2: Appropriate Assessment	Assesses impact/s of the proposed development on the integrity of a European site(s), either alone or in-combination. Integrity is assessed with respect to: (i) site conservation objectives; and (ii) site structure, function and overall integrity, and considers the role of mitigation.	The output from this stage is an Natura Impact Statement (NIS). This document must include sufficient information for the competent authority to carry out the appropriate assessment. If the assessment is negative, i.e. adverse effects on the integrity of a site cannot be excluded despite incorporation of measures to avoid or reduce the

[27] Telephone discussion with Miriam Crowley 05.07.22.

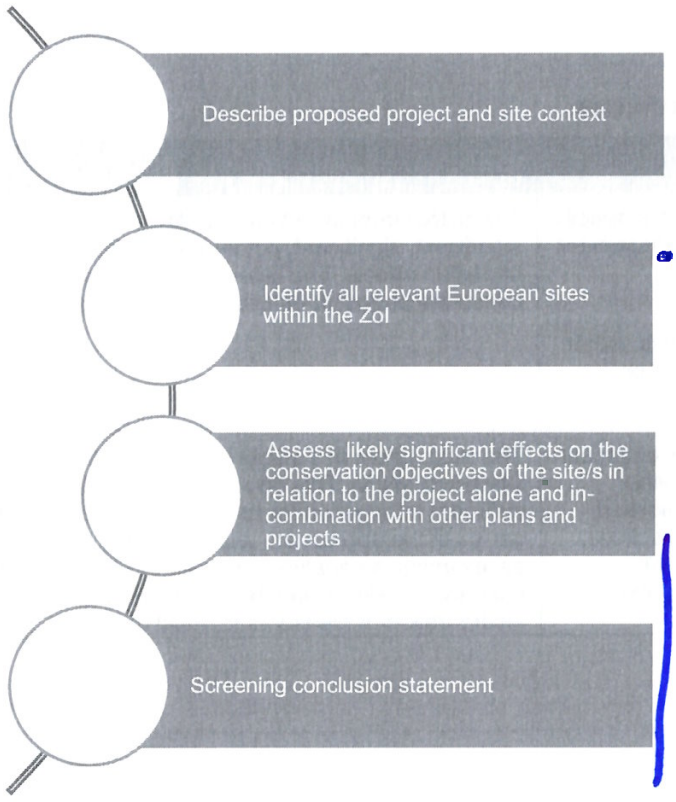
[28] Further to this, guidance may be sourced from the Further guidance may be found in the All-Ireland Pollinator Plan, available: https://pollinators.ie/

Stage	Process	Output
		adverse effects, then the process must consider alternatives (Stage 3).
Stage 3: Assessment of Alternatives	Assesses alternative ways of achieving the objectives of the project that avoid adverse impacts on the integrity of a European site. May be carried out concurrently with Stage 2 in order to find the most appropriate solution.	If no alternatives exist or all alternatives would result in negative impacts to site integrity, then the process either moves to Stage 4 or the project is abandoned. Also reported in the NIS.
Stage 4: Assessment where Adverse Impacts Remain	Undertaken when it has been determined that a project will have adverse effects on the integrity of a European site, but where no alternatives exist. Identifies compensatory measures where, in the context of Imperative Reasons of Overriding Public Interest (IROPI), it is deemed that the project or plan should proceed.	This stage should be avoided if at all possible. The test of IROPI and the requirements for compensation are extremely onerous. Also reported in the NIS.

Screening Assessment Method

3.8 Figure 3.1 illustrates the four steps of Screening. The method for each is described under the subsequent subheadings, and the results in Chapters 4 to 7 respectively.

Figure 3.1: The four steps of Screening



Project Description and Site Context

3.9 To inform a robust assessment of the potential impacts as a result of the proposed project, construction and operation are described (see Chapter 4). The spatial scope of the assessment and any temporal phases relevant to the European Sites are also identified.

3.10 Maps are provided of the project in relation to European Sites within the Zone of Influence (ZoI) to provide context of landscape and ecological character of the area.

S patal Scope: Identificati onof Relevant European Sites

3.11 When assessing impact, qualifying interests of conservation interest are only considered relevant where a credible or tangible source-pathway-receptor link exists between the proposed development and qualifying species or habitats. In order for an impact to occur, there must be a risk initiated by having a 'source' (e.g. construction works), a 'receptor' (e.g. a protected species, associated aquatic or riparian habitats), and an impact pathway between the source and the receptor (e.g. a watercourse which connects the proposed development site to the site designated for the protection of a species).

3.12 If there is no pathway or the qualifying interests of the European site are not vulnerable (either directly or indirectly) to any impact predicted from the proposed development then a site has not been screened in.

3.13 European sites are taken to include:

- Special Areas of Conservation (SAC) and candidate SAC designated under the Habitats Directive for

particular habitat types (Annex I) and species (Annex II); and

- Special Protection Areas (SPA) and proposed SPA designated under Article 4(1) of the Birds Directive for rare and vulnerable birds listed in Annex I, or Article 4(2) for regularly occurring migratory species not listed in Annex I;
- Ramsar sites identified as internationally important wetland habitat under the 1971 Ramsar Convention[29] are also considered in the assessment despite being at the wider international level.

Zone of Influence

3.14 The Zone of Influence (ZoI) for a project is the area over which qualifying interests may be subject to significant effects as a result of the proposed project and associated activities. The ZoI is likely to extend beyond the project site where there are ecological or hydrological links beyond the site boundaries which may result in an impact upon qualifying interests, in line with the Source-Pathway-Receptor model. The ZoI will vary for different ecological features depending on their sensitivity to an environmental change[30]. Note that distances are measured as 'direct lines' on digital mapping; in reality as a result of topography, distances may be greater, for example taking into account slope or cliff height.

3.15 Adopting the precautionary principle, an initial 15km ZoI was applied to identify a 'long list' of sites for consideration within the Screening (see Table 5.1 and Figure B-1 (Appendix B)). The 15km distance relates to specific qualifying species that rely on habitats that are outside of, but functionally linked to, the designation (referred to functionally linked land). Examples include golden plover and pink-footed goose which can rely on foraging habitats up to this distance. None of the European sites within the initial 15km ZoI include such bird species as a qualifying interest.

3.16 A 2km ZoI was therefore applied to the Screening[31] [32] to consider potential impacts on mobile species, including all other birds (Figure B-1).

3.17 A 500m ZoI was also applied for hydrological pathways (Figure B-1). There are no freshwater pathways landward of the project location so this 500m ZoI was applied to the seaward side to a distance of 500m reflecting potential pollution impacts that may result from construction and/ or operation.

3.18 A 200m ZoI was applied for potential species disturbance impacts resulting from noise, light or human activity as a result of construction activities (Figure B-1). This distance reflects the nature and small scale of the works which all occur within existing areas of developed or intensively managed land used frequently by the public.

3.19 Spatial mapping of European sites was downloaded from NPWS. Qualifying interests and conservation objectives of the sites concerned were determined from the NPWS designated site website[33]

Assessment of Likely Significant Effects

3.20 A risk-based approach involving the application of the precautionary principle was adopted in the assessment of LSE, such that a conclusion of 'no significant effect' has only been reached where it is considered very unlikely, based on current knowledge and the information available, that a proposal would not have a significant effect on the integrity of a European Site. The screening assessment identifies assumptions that have been applied to enable specific impacts on European sites to either be screened in or out.

Qualifying Interests and Conservation Objectives Potentially Affected

3.21 Knowledge of the proposed construction and operation was used to determine which qualifying interests/conservation objectives could be affected by the proposed development. Consideration has been given to the potential for the development proposed to result in significant effects associated with:

- Physical loss of/damage to habitat (including functionally linked land);
- Non-physical disturbance (noise, vibration and light);
- Changes to hydrology (water quality and quantity);
- Air pollution (including those resulting from changes in vehicular traffic, dust);
- Recreational pressure; and
- Climate change.

[29] Ramsar Convention on Wetlands of International Importance especially as Waterfowl Habitat 1971
[30] CIEEM (2018) Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine version 1.1. Chartered Institute of Ecology and Environmental Management, Winchester.
[31] Wilson, S., Levett-Therivel Sustainability Consultants, Treweek Environmental Consultants & Land Use Consultants (2006). Appropriate Assessment of Plans.
[31] National Parks & Wildlife Service. Designated site data
[32] Department of the Environment Heritage and Local Government (DEHLG) (2010). Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities, Second Edition
[33]

3.22 As Strandhill has experienced significant coastal erosion and flooding, consideration of predicted climate change impacts on the proposed design are also addressed using best available evidence. A comprehensive desk study was completed including the 2013 Irish Coastal Protection Strategy Study[34] and Coastal Erosion Study[35] to identify the principal vulnerabilities of the qualifying interests concerned which may relate to the potential impacts listed above, either directly or indirectly.

In-Combination Effects

3.23 In-combination assessment considers potential impacts of the project that may not be significant but, in-combination with other plans or projects, may collectively become so (see Chapter 6 impacts of 'No LSE'). It focuses on the qualifying interests that may be affected during construction, operation and/or decommissioning.

3.24 In-combination assessment is completed as part of th e Screening if none of the potential impacts identified have LS E. However, where LSE are concluded, in-combination assessment is conducted as part of the Natura Impact Statement.

3.25 In-combination assessment is not completed if no potential impact (of any scale) is identified.

3.26 An initial list of Plans and projects for consideration in - combination were identified by the LUC team (see Table 3 .2) The list includes adopted and finalised draft plans where t hese are formally published or submitted for consultation or adoption.

3.27 Projects that may affect the same European sites at which potential impact is identified as a result of this Screening assessment (Chapter 6) were assessed in-combination, taking into account the nature and scale of potential impacts on qualifying features.

Table 3.1: Plans and Projects to be considered in-combination

Plan / Project Name	Description
Project Ireland 2040[36]	Project Ireland 2040 is the government's long-term overarching strategy to make Ireland a better country for all and to build a more resilient and sustainable future. The strategy ensures the alignment of investment plans with the stated National Strategic Objectives for 2040 in a considered, cohesive and defined manner. Project Ireland 2040 comprises of the National Development Plan and the National Planning Framework. The Public Realm Enhancement at Strandhill funded by the Rural Regeneration and Development Fund will contribute towards this Strategy through developing plans for pedestrian friendly village centres through re-designed public realm areas, walkways and addressing dereliction.
National Planning Framework[37]	A planning framework to guide development and investment over the coming years. It does not provide every detail for every part of the country; rather it empowers each region to lead in the planning and development of their communities, containing a set of national objectives and key principles from which more detailed and refined plans will follow.
National Development Plan[38]	Sets out the Government's over-arching investment strategy and budget for the period 2021-2030. The NDP is to work in parallel with the National Planning Framework to ensure that the investment strategy supports spatial planning.

[34] OPW. 2013. Irish Coastal Protection Strategy. https://www.gov.ie/en/publication/eed0fb-irish-coastal-protection-strategy-study-icpss/#:~:text=The%20Irish%20Coastal%20Protection%20Strategy%20Study%20%28ICPSS%29%20is,risks%20associated%20with%20coastal%20flooding%20and%20coastal%20erosion.

[35] RPS (2012) Coastal Erosion Study Strandhill Beach for Sligo County Council

[36] Government of Ireland (2020) Project Ireland 2040 Northern and Western Regio: 2020 update [online] Available at: https://www.gov.ie/en/collection/3baee-project-ireland-2040-regionalreports/#2020

[37] Government of Ireland (2020)'The National Planning Framework:. Available at: https://npf.ie/project-ireland-2040-national-planning-framework/#:~:text=The%20National%20Planning%20Framework%20About%20The%20Department%20of,social%2C%20economic%20and%20cultural%20development%20of%20our%20country.

[38] Government of Ireland (2021) National Development Plan. Available at: https://www.gov.ie/en/publication/774e2-national-development-plan-2021-2030/

Plan / Project Name	Description
Rural Regeneration and Development Fund (RRDF)[39]	The Rural Regeneration and Development Fund was established to deliver on the National Strategic Objective in the National Development Plan of Strengthened Rural Economies and Communities. The Fund provides investment to support suitable projects in towns and villages with a population of less than 10,000, and outlying areas, which will deliver on the this objective and achieve sustainable economic and social development in these areas. This Fund is the principle funder of this project.
Regional Spatial and Economic Strategy for the Northern and Western Regional Assembly[40]	Policies and projects with potential impacts: ■ RPO 3.7.51 - Cycleways and walking routes – expansion throughout the urban area and outwards to the satellite villages of Ballysadare, Strandhill and Rosses Point, linking into established and planned recreational trails such as Union Wood, Knocknarea etc. ■ RPO 3.7.56 - Tourist attraction – support the development of a major attraction in Sligo Town, as well as further expansion in the tourism functions of villages Strandhill and Rosses Point.
Rosses Point Public Realm Enhancement Project	Public realm enhancement to introduce safe and connected pedestrian and cycle access, rationalised car parking and traffic calming, landscape planting and street furniture. No predicted impacts on the qualifying interests were identified in the AA Screening (LUC, 2023) for the Rosses Point project, at any scale. As such, there are no impacts to consider in combination.

Screening Conclusion Statement

3.28 To support the decision-making of the competent authority, a clear statement of the conclusion reached, and the basis upon which it was reached is provided in Chapter 7. Where significant effects cannot be excluded – either alone or in-combination – full appropriate assessment would be required to inform determination of the planning decision.

[39] RRDF (2022) https://www.gov.ie/en/policy-information/c77144-rural-regeneration-and-development-fund/#:~:text=The%20Rural%20Regeneration%20and%20Development%20Fund%20%28RRDF%29%20is,population%20of%20less%20than%2010%2C000%2C%20and%20outlying%20areas.

[40] Northern & Western Regional Assembly (undated) Regional Spatial and Economic Strategy for the Northern and Western Regional Assembly [pdf]. Available at: https://www.nwra.ie/wpcontent/ uploads/2020/01/adpoted-rses.pdf

Chapter 4
Project Description and Site Context

Project Objectives

4.1 The aim of the public realm enhancements at Strandhill is to "*strengthen Strandhill's position as a unique coastal destination enjoyed by the existing user capacity from the local and wider community. The proposed works seek to re-address the balance between vehicles and pedestrians, creating a safer environment for social interaction and engagement within the unique landscape*" [41].

4.2 Key objectives for the project, as defined by the Planning Section and LUC design team are to:

- Ensure pedestrian safety;
- Strengthen pedestrian connectivity;
- Rationalise parking and traffic movements;
- Reduce traffic speeds;
- Enhance the character, views and heritage; and
- Increase the amount of civic space.

Direct Connection with, or Necessary to, Conservation Management of European Site

4.3 The proposed works at Strandhill are not in direct connection with, nor are they currently considered necessary to, the conservation management of any nearby European sites.

4.4 The proposed project lies entirely within existing areas of hard standing. No Activities Requiring Consent (ARCs) (i.e. specific activities which have the potential to damage a European site[42]) apply to the proposed works.

[41] LUC (2022) Draft Part 8 Report, January.

[42] A list of 38 ARCs has been established, including 'construction or alteration of tracks, paths, roads, bridges, culverts or access routes' and 'works on, or alterations to, the banks, bed or flow of a drain, watercourse or waterbody'. ARCs are not prohibited activities but before being carried out, require consent from the Minister for Housing, Local Government and Heritage or by another relevant public authority to which the consent function for that activity falls. It is an offence to carry out an ARC without prior consent. This requirement ensures that the Minister (or relevant competent authority) carries out the necessary environmental assessment to determine if the activity can take place and if any conditions should be attached to any consent given. https://www.npws.ie/farmers-and-landowners/activities-requiring-consent

Project Locations and Site Context

4.5 Located in the village of Strandhill, Carrowbunnaun, Knockaree (OSiGR: G 60357 35875), the project sits on the shorefront of Sligo Bay, between two coastal and estuarine areas of designation:

- the estuary of Ballysadare Bay SAC and SPA lies 200m to the south of the proposed project;
- Cummeen Strand/ Drumcliff Bay SAC and Cummeen Strand SPA lies 330m north.

4.6 The project area comprises existing hardstanding (public highway, pavement and car parking); no natural habitats currently occur within the red line boundary. The project will increase the area of vegetated habitats in the form of biodiverse planting, including trees and ornamental shrubs integrated to the public realm at the car park and along the promenade.

4.7 Strandhill beach lies immediately west of the project area (existing shore front promenade), with coastal and estuarine habitats beyond. The existing shore front promenade is separated from the natural coastline by the boundary wall which will remain; the proposed enhancements avoid contact with the existing rock armour.

4.8 Strandhill Golf Course lies to the south, and village residential and commercial properties to the east and north. Outside of the village built environment and road infrastructure, the land use is dominated by rural land uses.

4.9 Drawings describing the nature and extent of the proposed development which will be put on display as part of this Part 8 public consultation process are provided in Appendix A of this report.

Proposed Development Works

Construction

4.10 The date of commencement and duration for construction are yet to be confirmed. For the purposes of assessment, it is assumed that the works will avoid the peak periods in the year when storm surges and overtopping are likely to occur.

4.11 Temporary construction access, storage areas and working widths will all fall within the red line boundary, which lies behind the existing shore front promenade wall. Works will be permitted only where noise and other disturbance are managed within the limits required to avoid nuisance to immediately adjacent residential properties. It is assumed that the successful contractor appointed by the council will be required to adhere to current best practice measures regarding the safe use of chemicals on site, provision of emergency response procedures, dust suppression, silt prevention, etc.

4.12 Proposed enhancements are described below for each of the three project areas – the shore front promenade, Shore Road, and the council car park. Throughout, SuDS measures are embedded within the project design and, as such, are not assessed as 'additional mitigation'. These measures will take into account coastal processes and predicted climate change to ensure the design is fit for purpose in the long term.

4.13 Car parking spaces are being reallocated to the main Council car park from the Promenade. The main Council Car Park will be reconfigured to facilitate this increase in spaces. When compared to pre-covid times, this scheme will provide 44 more car parking spaces to Strandhill. 42 car parking spaces will remain in place on the Shore Front. These will be made up of 10 designated disabled spaces and a mix of age-friendly spaces, unrestricted spaces and short-stay spaces. The exact composition of these spaces will be determined at detailed design stage. The main council car park will have 306 car parking spaces plus 17 disabled spaces and 6 motorbike spaces. Rationalised turning circles, a pedestrian-priority civic space incorporating historic features, and biodiverse planting are proposed including rain gardens along the promenade which will capture and filter surface water run-off.

4.14 The proposed works do not include any changes to the boundary wall which separates the existing promenade from the natural coastline. The works avoid contact with the existing rock armour.

4.15 The focus along Shore Road is the enhancement of the walking route from the main council car park to the sea front. Measures to achieve this include narrowing the entrance point to Shore Road to 3m and providing clear signage of vehicular parking availability. Wider pedestrian footways and quality street furniture along footways are also proposed; all within the existing hard standing. As the enhancement works are surface level, existing site drainage remains i.e. roadway drainage with silt / pollution traps to current highways standards.

4.16 Lighting columns will be installed along Shore Road (detailed design yet to be confirmed). Overhead wires will be removed.

4.17 The works include an enhanced bus stop / shelter at the main car park.

Operation

4.18 Transitioning from vehicular access will improve connectivity for active transport modes – pedestrian and cycle – through the town. No significant net change in the number of users of the site is predicted by the client team.

4.19 Consideration of climate change effects during the operational phase are addressed in Chapter 6.

Decommissioning

4.20 The proposed works will be maintained to support public access and use in perpetuity. Decommissioning is not therefore assessed.

Chapter 5
Identification of Relevant European Sites

5.1 Relevant European Sites were identified using the Source-Pathway-Receptor model, and information on the qualifying interests and conservation objectives. This information was used to conduct a high level assessment with consideration of the nature, extent and programme of work in order to screen out European sites.

5.2 Table 5.1 lists designated SACs and SPA screened into the assessment, including their proximity to the works location. Figure B-1 shows European Sites within each ZoI. There are no Ramsar sites within the ZoI assessed.

Table 5.1: European Sites identified within each ZoI assessed

European site	Direction and distance from each project site	Site Screened into assessment			
		Initial 15km ZoI	2km ZoI	500m ZoI (hydrological connectivity)	200m ZoI (construction related species disturbance)
Ballysadare Bay SPA	SPA located 130m south	Yes	Yes	Yes	Yes
Ballysadare Bay SAC	SAC located 260m south	Yes	Yes	Yes	-
Cummeen Strand/ Drumcliff Bay SAC	SAC located 320m north	Yes	Yes	Yes	-
Cummeen Strand SPA	SPA located 1.4km north	Yes	Yes	-	-
Drumcliff Bay SPA	SPA located 5.7km north	Yes	-	-	-
Ballintemple and Ballygilgan SPA	SPA located 7.5km north-west	Yes	-	-	-
Lough Gill SAC	SAC located 8.6km east	Yes	-	-	-
Ardboline Island and Horse Island SPA	SPA located 8.8km north-west	Yes	-	-	-
Unshin River SAC	SAC located 8.6km north-west	Yes	-	-	-

European site	Direction and distance from each project site	Site Screened into assessment			
		Initial 15km ZoI	2km ZoI	500m ZoI (hydrological connectivity)	200m ZoI (construction related species disturbance)
Aughris Head SPA	SPA located 10.1km west	Yes	-	-	-
Knockalongy and Knockaree Cliffs SAC	SAC located 10.1km north-east	Yes	-	-	-
Union Wood SAC	SAC located 10.2km north-west	Yes	-	-	-
Ben Bulben, Glenriff and Glenade Complex SAC	SAC located 11.8km north-east	Yes	-	-	-
Sligo/ Leitrim Uplands SPA	SAC located 11.8km north-east	Yes	-	-	-
Ox Mountains Bogs SAC	SAC located 12.9km north-east	Yes	-	-	-
Streedagh Point Dunes SAC	SAC located 13.9km north	Yes	-	-	-

Summary

5.3 Sixteen European sites were identified within the initial 15km ZoI, of which only four occur within the 2km ZoI and therefore considered further. Three sites occur within the 500m ZoI assessed for hydrological impacts (Ballysadare Bay SAC and SPA, and Cummeen Strand/ Drumcliff Bay SAC). A single European site (Ballysadare Bay SAC) lies within the 200m ZoI for construction related disturbance.

Chapter 6
Assessment of Likely Significant Effects

6.1 The maintenance of habitats and species within individual European sites at favourable conservation condition contributes to the overall maintenance of favourable conservation status of those habitats and species at a national and international level. It is therefore necessary to identify any potential impacts of the proposed development on the conservation status of European sites.

6.2 In this section potential impacts associated with the proposed development will be identified before an assessment is made, as to whether these theoretical impacts are likely to cause significant impacts on the European sites listed in Table 5.1 above, in view of those sites' conservation objectives.

6.3 Identification of a theoretical risk does not constitute a prediction either that it will occur, or that it will cause or create an adverse impact. However, identification of the risk does mean that there is a possibility of ecological or environmental damage occurring, with the level and significance of the impact depending upon the nature and exposure to the risk and the characteristics of the receptor.

Direct and Indirect Impacts of Public Realm Enhancements at Strandhill

6.4 There is no land take from any of European Sites as a result of the proposed works at Strandhill. Potential impacts are identified in Table 6.1.

Table 6.1: Potential ecological impacts associated with the project

Description of elements of the project likely to give rise to potential ecological impact	Likely changes to arise as a result
Temporary disturbance during construction ■ Movement of construction vehicles and staff, use of construction equipment within the project area (behind and separate to the existing shore front promenade wall) may incur localised noise and visual disturbance. ■ As works will be permitted only within the limits required to avoid causing nuisance to residential properties adjacent to the project area, no marked disturbance on species in the immediate vicinity is predicted.	Risk of potential impact during the working day on species where these occur on the beach in proximity to the work site (within 200m). This theoretical risk is assessed further in Table 6.2.
Construction related pollution ■ Consideration of this risk principally relates to temporary construction works at the shore front promenade (rather than also Shore Road or the council car park) which overtops with seawater during inclement weather conditions and where the distance from potential receptors lie within 500m. As construction is	No predicted impact

Description of elements of the project likely to give rise to potential ecological impact	Likely changes to arise as a result
assumed to avoid the peak periods in the year when storm surges and overtopping are likely to occur, the likelihood of such impact is negligible. ■ Risk of accidental pollution (such as release of fuels or oils to the aquatic environment) or accidental surface run-off laden with sediment/s (such as cementitious material/concrete wastewater resulting from laying substrates to create new road surfaces) would be avoided through compliance with standard best practice construction, to which all council contractors are expected to adhere.	
Operational pollution ■ No change in the quality or quantity of surface water run-off is predicted over and above existing levels. ■ Reduction in motorised vehicle parking may translate to a small-scale beneficial impact on surface water run-off, although the degree of change is not measurable. Existing levels are not identified to pose constraint to the qualifying interests of conservation objectives of any European site within the ZoI. ■ LED lighting columns will be installed along Shore Road, targeted on the public realm areas to avoid light spill or reflection that may affect local nocturnal or crepuscular wildlife.	No predicted impact
Local recreational activity during operation ■ The reduction in vehicular activity through the project area is predicted to be met with an increase in pedestrian and cycle activity. This will incur a shift in the nature and extent of noise and human disturbance from those currently experienced, although no net change in the overall level of use is predicted.	No predicted impact

Consideration of Climate Change

6.5 The 2013 Irish Coastal Protection Strategy Study identified Marley's Point to Strandhill as one of three potentially significant areas of coastal erosion in Sligo[43]. Existing rock revetments, coastal paths, sand dunes and the Strandhill Golf Course (fairway at hole 7) have all been recorded as being at risk[44].

6.6 Analysis of the wave climate inshore shows that the wave heights approaching the beach at Strandhill are sensitive to tidal levels with the larger waves approaching at times when the water levels are high[45]. Within Sligo there is a significant risk associated with increasing sea levels as a result of climate change, which will result in significant new areas of flooding from those predicted to be affected in current risk scenarios[46].

6.7 Climate change is predicted to increase sea levels and wave heights and increase the occurrence of extreme winds and extreme storms in Sligo[47]. Consultation with the council teams acknowledge wave overtopping in Strandhill. Although flood risk from wave overtopping was not identified as a significant source of flood risk for Sligo in the Catchment-based Flood Risk Assessment and Management Study, the report does acknowledge there is a significant risk associated with increasing sea levels as a result of climate change which will result in significant new areas of flooding from those predicted to be affected in the current risk scenario[48]. Climate-related threats to qualifying interests particularly

[43] OPW. 2013. Irish Coastal Protection Strategy. https://www.gov.ie/en/publication/eed0fb-irish-coastal-protection-strategy-study-icpss/#:~:text=The%20Irish%20Coastal%20Protection%20Strategy%20Study%20%28ICPSS%29%20is,risks%20associated%20with%20coastal%20flooding%20and%20coastal%20erosion .
[44] RPS. 2012 Strandhill Coastal Erosion Study Economic Appraisal.
[45] RPS. 2012. Strandhill Beach Coastal Erosion Report
[46] Western CFRAM Unit of Management 35 Final Preliminary Options Report: Volume 1 - Overarching Report
[47] Sligo County Council. 2019. Sligo Climate Adaptation Strategy.
[48] JBA Consulting. 2016. Western CFRAUnit of Management 31Final Preliminary Options Report: Volume 1 - Overarching Report

related to loss of sand dunes, especially fixed dunes which usually occur where the wind speed is reduced and the vegetation is removed from the influence of tidal inundation and salt spray. Warmer and more acidic oceans may disrupt coastal and marine ecosystems causing algal blooms or saline intrusion on freshwater habitats/estuaries may occur. This may reduce the quality of foraging habitat for wading and wintering birds. Drier and warmer weather will also likely see an increased in beach tourism and marine activities which would exacerbate existing known recreational pressure.

6.8 Flooding or related impacts such as siltation or urban run-off are not referenced as threats in the conservation objectives or supporting documents for Cummeen Strand/ Drumcliff Bay SAC[49], Ballysadare Bay SAC[50] or Lough Gill SAC[51].

6.9 The proposed works will not increase hard standing or alter current drainage regimes. No changes to permeability and thus increase in the presence of standing water or sewerage is expected as a direct consequence of the project. New areas of soft landscape along the shorefront are likely to aid the drainage of the site.

6.10 Increase in visitor capacity is not expected as a result of the public realm enhancements, therefore no further recreational pressure is expected as a direct consequence of the proposed works in warmer and longer climate scenarios.

Potential Effects on European Sites

6.11 To confirm whether there is risk of any LSE as a result of the proposed development, this section considers the European sites identified in Chapter 5.1 within the 2km, 500m and 200m ZoI, assessing each qualifying interest in turn against the impacts identified in Table 6.1.

[49] NPWS (2013) Ballysadare Bay SAC (site code 622) Conservation objectives supporting document -coastal habitat. Weblink: https://www.npws.ie/sites/default/files/publications/pdf/Ballysadare%20Bay%20SAC%20(000622)%20Conservation%20objectives%20supporting%20document%20-%20coastal%20habitats%20[Version%201].pdf

[50] McCorry, M. & Ryle, T. (2009) Saltmarsh Monitoring Project 2007-2009. Weblink: https://www.npws.ie/sites/default/files/publications/pdf/McCorry_&_Ryle_2009_Saltmarsh_survey_V4.pdf

[51] NPWS (2021) Conservation Objectives Series Lough Gill SAC. Weblink: https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO001976.pdf

Table 6.2: Assessment of Likely Significant Effect

European Site	Code	Qualifying Interest	Potential functional or physical connectivity between qualifying interests and location of proposed works	Justification	Potential source-pathway-receptor identification	Likely Significant Effect/s
Cummeen Strand/ Drumcliff Bay (Sligo Bay) SAC	1130	Estuaries	Yes	The Strandhill project area is located 250m south-west of the SAC. However, there are no designated habitats of qualifying interest within the site boundary as confirmed by coastal and marine habitat mapping (NPWS 2013a [52], NPWS 2013b [53]). No loss of habitat or changes to the distribution or quality of intertidal and coastal community complexes will result from the proposed project. The principal vulnerabilities of tidal estuaries are pollution from nutrient enrichment or input of contaminants, invasive non-native species and physical modifications of the watercourse or its flood capacity[54]. The proposed project incurs no increase in risk associated with these vulnerabilities. There is no anticipated increase in recreational pressure on the designation associated with the project.	N/A	No Effect

[52] NPWS (2013a) Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC (site code 627) Conservation objectives supporting document -coastal habitats. Pg. 16
[53] NPWS (2013b) Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC (site code: 627) Conservation objectives supporting document - Marine habitats and species. Pg. 19-21
[54] European Commission Freshwater Habitat Group (2016) C2.4 Tidal river, upstream from the estuary. Weblink: https://projects.eionet.europa.eu/european-red-list-habitats/library/terrestrial-habitats/c.-freshwater/c2.4-tidal-river-upstream-estuary-1

European Site	Code	Qualifying Interest	Potential functional or physical connectivity between qualifying interests and location of proposed works	Justification	Potential source-pathway-receptor identification	Likely Significant Effect/s
	1140	Mudflats and sandflats not covered by seawater at low tide	Yes	The Strandhill project area is located 250m south-west of the SAC. However, there are no designated habitats of qualifying interest within the site boundary, nor within 250m of the site boundary, as confirmed by coastal and marine habitat mapping (NPWS 2013a [55], NPWS 2013b [56]). No loss of habitat or changes to the distribution or quality of intertidal and coastal community complexes will result from the proposed project. In Ireland, the overall status of the habitat is inadequate and deteriorating due to decline in habitat area and partly by pollution from agricultural, forestry and wastewater sources, as well as impacts associated with marine aquaculture, particularly the Pacific oyster[57]. The proposed project incurs no increase in risk associated with these vulnerabilities. There is no anticipated increase in recreational pressure on the designation associated with the project.	N/A	No Effect

[55] NPWS (2013a) Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC (site code 627) Conservation objectives supporting document -coastal habitats. Pg. 16
[56] NPWS (2013b) Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC (site code: 627) Conservation objectives supporting document - Marine habitats and species. Pg. 19-21
[57] NPWS (2019) Article 17 Volume 1: The Status of EU Protected Habitats and Species in Ireland 2019. Weblink: https://www.npws.ie/sites/default/files/publications/pdf/NPWS_2019_Vol1_Summary_Article17.pdf

European Site	Code	Qualifying Interest	Potential functional or physical connectivity between qualifying interests and location of proposed works	Justification	Potential source-pathway-receptor identification	Likely Significant Effect/s
	2110	Embryonic shifting dunes	No	Presence of these dune habitats are not found within, or directly connected to, the project area. The proposed project will not result in change to the structure and function of vegetation communities. No catchment-level changes to sedimentation or frequency of tidal inundation will result from the proposed works. There is no anticipated increase in recreational pressure on the designation associated with the project.	N/A	No Effect
	2120	Shifting dunes along the shoreline with *Ammophila arenaria* (white dunes)	No			
	2130	Fixed coastal dunes with herbaceous vegetation (grey dunes)	No			
	5130	Juniperus communis formations on heaths or calcareous grasslands	No	Presence of these terrestrial habitats are not found within, or connected to, the project area. The proposed project will not result in change to the structure and function of vegetation communities. There is no anticipated increase in recreational pressure on the designation associated with the project.	N/A	No Effect
	6210	Semi-natural dry grasslands and scrubland facies on calcareous substrates	No			

European Site	Code	Qualifying Interest	Potential functional or physical connectivity between qualifying interests and location of proposed works	Justification	Potential source-pathway-receptor identification	Likely Significant Effect/s
		(Festuco-Brometalia) (* important orchid sites)				
	7220	Petrifying springs with tufa formation (Cratoneurion)	No	Presence of this habitat is not found within, or connected to, the project area. The proposed project will not result in change to the structure and function of vegetation communities. No catchment-level changes to sedimentation or frequency of tidal inundation will result from the proposed works. There is no anticipated increase in recreational pressure on the designation associated with the project.	N/A	No Effect
	1014	Narrow-mouthed Whorl Snail *Vertigo angustior*	No	Narrow-mouthed whorl snail is restricted to the sand dune habitat at Killaspugbrone, over 500m to the north of Strandhill. No potential construction or operational, direct or indirect impacts are predicted on this species or its habitats, as a result of the proposed public realm enhancement interventions.	N/A	No Effect

European Site	Code	Qualifying Interest	Potential functional or physical connectivity between qualifying interests and location of proposed works	Justification	Potential source-pathway-receptor identification	Likely Significant Effect/s
	1095	Sea Lamprey *Petromyzon marinus*	Yes	Sea lamprey migrate along the estuary, whjch is located over 1.5km north of the project boundary. No potential construction or operational, direct or indirect impacts are predicted on this species or its habitats, as a result of the proposed public realm enhancement interventions.	N/A	No Effect
	1099	River Lamprey *Lampetra fluviatilis*	No	River lamprey is restricted to the upper sections of the SAC river, upstream of Strandhill and as such is not connected to the project area.	N/A	No Effect
	1365	Harbour Seal *Phoca vitulina*	Yes	Harbour seal breeding and haul-out sites are located over 6km north of the project area. No potential construction or operational, direct or indirect impacts are predicted on this species or its habitats, as a result of the proposed public realm enhancement interventions.	N/A	No Effect
Cummeen Strand SPA	A046	Light-bellied Brent Goose *Branta bernicla hrota*	No	The principal supporting habitat of the qualifying species are intertidal mud and sand flats. This habitat is not located within the project area, nor within 250m of the site boundary, as confirmed by coastal and marine habitat mapping (NPWS 2013a, NPWS 2013b). The subsite of the SPA nearest to the project area (Killaspug Pt - Dorrins Strand West)	N/A	No Effect
	A130	Oystercatcher *Haematopus ostralegus*	No			

European Site	Code	Qualifying Interest	Potential functional or physical connectivity between qualifying interests and location of proposed works	Justification	Potential source-pathway-receptor identification	Likely Significant Effect/s
	A162	Redshank *Tringa totanus*	No	is used for roosting and foraging but these are located over 2km from the project area [58]. The project area lies landward of the boundary wall separating the existing promenade from the natural coast. Construction will be manged to ensure potential disturbance impacts will, as a minimum, not incur nuisance to local residential properties and as such, are not predicted to adversely impact the qualifying species populations or the qualifying assemblage. The principal cause of disturbance to birds in the subsite of the SPA nearest the project area was by aircraft, which will not be influenced by the proposed scheme. There is no anticipated increase in recreational pressure on the designation associated with the project.		
	A999	Wetland and Waterbirds	No			
Ballysadare Bay SAC	1130	Estuaries	Yes	There are no designated estuarine habitats of qualifying interest within the site boundary[59]. No loss of habitat or changes to the distribution or quality of intertidal and coastal community complexes will result from the proposed project. The principal vulnerabilities of tidal estuaries are pollution from nutrient enrichment or input of	N/A	No Effect

[58] NPWS (2013) Cummeen Strand Special Protection Area. (Site Code 4035) Conservation Objectives Supporting Document Version 1. Pg 53-55
[59] NPWS (2013c) Conservation Site Objectives SAC Ballysadare Bay SAC 000622. Pg. 20-21

European Site	Code	Qualifying Interest	Potential functional or physical connectivity between qualifying interests and location of proposed works	Justification	Potential source-pathway-receptor identification	Likely Significant Effect/s
				contaminants, invasive non-native species and physical modifications of the watercourse or its flood capacity[60]. The proposed project incurs no increase in risk associated with these vulnerabilities.		
	1140	Mudflats and sandflats not covered by seawater at low tide	Yes	There are no designated habitats of qualifying interest within the site boundary, nor within 250m of the site boundary[61]. No loss of habitat or changes to the distribution or quality of intertidal and coastal community complexes will result from the proposed project. In Ireland, the overall status of the habitat is inadequate and deteriorating due to decline in habitat area and partly by pollution from agricultural, forestry and wastewater sources, as well as impacts associated with marine aquaculture, particularly the Pacific oyster[62]. The proposed project incurs no increase in risk associated with these vulnerabilities. There is no anticipated increase in recreational pressure on the designation associated with the project.	N/A	No Effect

[60] European Commission Freshwater Habitat Group (2016) C2.4 Tidal river, upstream from the estuary. Weblink: https://projects.eionet.europa.eu/european-red-list-habitats/library/terrestrial-habitats/c.-freshwater/c2.4-tidal-river-upstream-estuary-1

[61] NPWS (2013c) Conservation Site Objectives SAC Ballysadare Bay SAC 000622. Pg. 20

[62] NPWS (2019) Article 17 Volume 1: The Status of EU Protected Habitats and Species in Ireland 2019. Weblink: https://www.npws.ie/sites/default/files/publications/pdf/NPWS_2019_Vol1_Summary_...cle17.pdf

European Site	Code	Qualifying Interest	Potential functional or physical connectivity between qualifying interests and location of proposed works	Justification	Potential source-pathway-receptor identification	Likely Significant Effect/s
	2110	Embryonic shifting dunes	No	These dune habitats are not present within, or directly connected to, the project location. The proposed project will not result in change to the structure and function of vegetation communities. No catchment-level changes to sedimentation or frequency of tidal inundation will result from the proposed works. There is no anticipated increase in recreational pressure on the designation associated with the project.	N/A	No Effect
	2120	Shifting dunes along the shoreline with *Ammophila arenaria* (white dunes)	No			
	2130	Fixed coastal dunes with herbaceous vegetation (grey dunes)	No			
	2190	Humid dune slacks	No			
	1365	Harbour Seal *Phoca vitulina*	Yes	Harbour seal breeding and haul-out sites are located over 2km south-west of the project area[63]. No potential construction or operational, direct or indirect impacts are predicted on this species or its habitats, as a result of the proposed public realm enhancement interventions.	N/A	No Effect

[63] NPWS (2013c) Conservation Site Objectives SAC Ballysadare Bay SAC 000622. Pg. 24

European Site	Code	Qualifying Interest	Potential functional or physical connectivity between qualifying interests and location of proposed works	Justification	Potential source-pathway-receptor identification	Likely Significant Effect/s
				There is no anticipated increase in recreational pressure on the designation associated with the project, such that may impact breeding sites or haul out sites.		
	1014	Narrow-mouthed *Whorl Snail Vertigo angustior*	No	Narrow-mouthed whorl snail has restricted distribution within sand dune habitat at Strandhill, over 200m from the project area. No potential construction or operational, direct or indirect impacts are predicted on this species or its habitats, as a result of the proposed public realm enhancement interventions.	N/A	No Effect
Ballysadare Bay SPA	A046	Light-bellied Brent Goose *Branta bernicla hrota*	Yes	The SPA is located 200m from the Strandhill project area. The principal supporting habitat of the qualifying species are intertidal mud and sand flats. This habitat is not located within the project area, nor within 200m of the site boundary[64]. No roosting sites were found in the subsite of the SPA nearest the project area (area 0C452 - Strandhill)[65].	N/A	No Effect
	A141	Grey Plover *Pluvialis squatarola*	Yes			
	A149	Dunlin *Calidris alpina*	Yes			

[64] NPWS (2013c) Conservation Site Objectives SAC Ballysadare Bay SAC 000622. Pg. 20-21
[65] NPWS (2013d) Ballysadare Bay Special Protection Area (Site Code 4129).Conservation Objectives Supporting Document Version 1 Pg 58

European Site	Code	Qualifying Interest	Potential functional or physical connectivity between qualifying interests and location of proposed works	Justification	Potential source-pathway-receptor identification	Likely Significant Effect/s
	A157	Bar-tailed Godwit *Limosa lapponica*	Yes	There is no anticipated increase in recreational pressure on the designation associated with the project.		
	A162	Redshank *Tringa totanus*	Yes			
	A999	Wetland and Waterbirds	Yes			

Chapter 7
Screening Conclusions

Screening Conclusion Statement

7.1 This Screening has been undertaken in accordance with best practice guidance. Potential impacts associated with the proposed project are summarised in Table 7.1.

7.2 Individually or in-combination with other plans or projects, the proposed development would not be likely to have a significant effect on any Natura 2000 site. An Appropriate Assessment is therefore not required.

Table 7.1: Screening Conclusion

European Site	Qualifying interest	Significant Effects	Potential Impact Pathway(s)
Ballysadare Bay SPA	Light-bellied Brent Goose	No Effect	N/A
	Grey Plover	No Effect	N/A
	Dunlin	No Effect	N/A
	Bar-tailed Godwit	No Effect	N/A
	Redshank	No Effect	N/A
	Wetland and Waterbirds	No Effect	N/A
Ballysadare Bay SAC	Estuaries	No Effect	N/A
	Mudflats and sandflats not covered by seawater at low tide	No Effect	N/A
	Embryonic shifting dunes	No Effect	N/A
	Shifting dunes along the shoreline with *Ammophila arenaria* (white dunes)	No Effect	N/A
	Fixed coastal dunes with herbaceous vegetation (grey dunes)	No Effect	N/A
	Humid dune slacks	No Effect	N/A
	Harbour Seal	No Effect	N/A

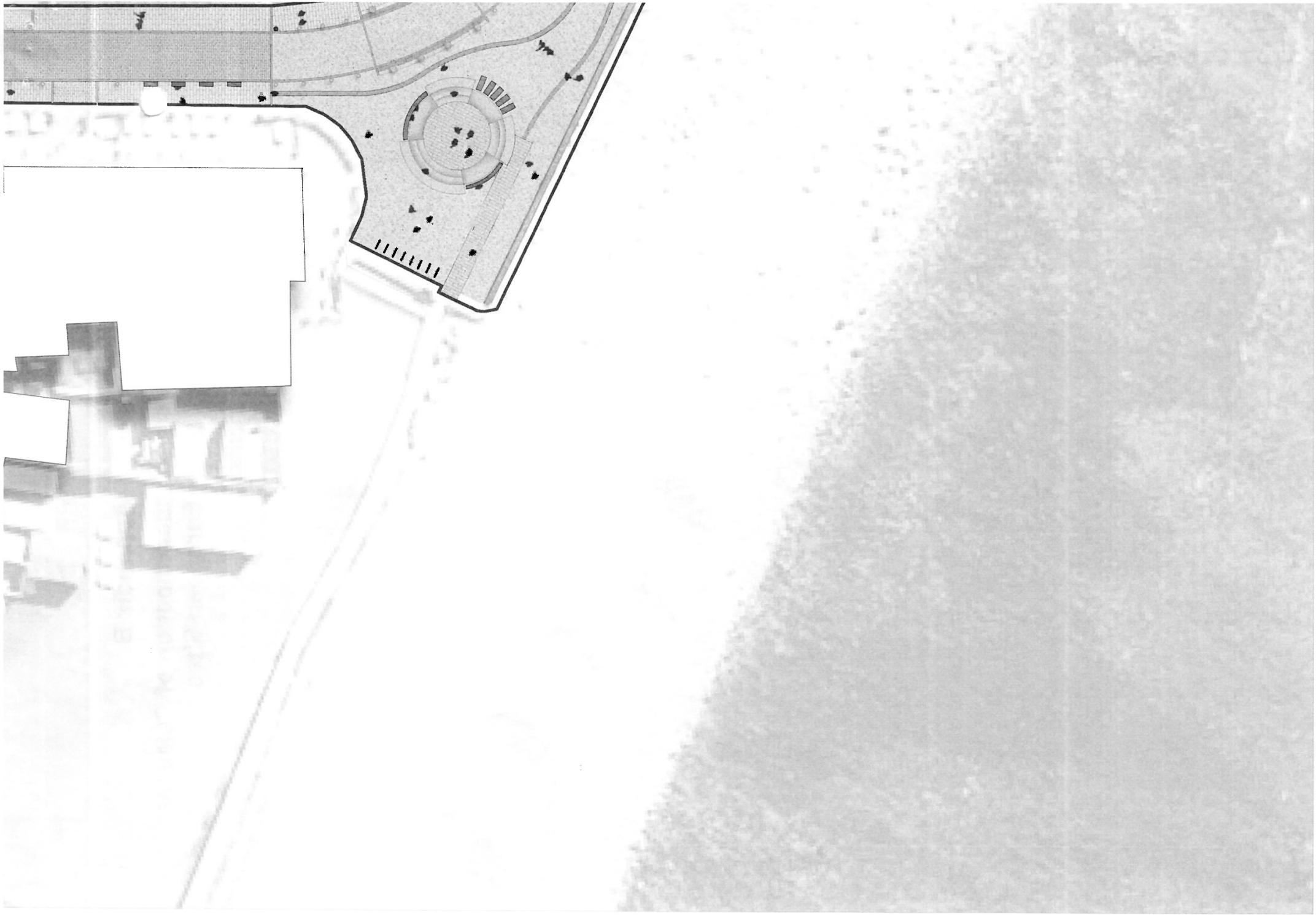
European Site	Qualifying interest	Significant Effects	Potential Impact Pathway(s)
	Narrow-mouthed Whorl Snail	No Effect	N/A
Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC	Estuaries	No Effect	N/A
	Mudflats and sandflats not covered by seawater at low tide	No Effect	N/A
	Embryonic shifting dunes	No Effect	N/A
	Shifting dunes along the shoreline with Ammophila arenaria (white dunes)	No Effect	N/A
	Fixed coastal dunes with herbaceous vegetation (grey dunes)	No Effect	N/A
	Juniperus communis formations on heaths or calcareous grasslands	No Effect	N/A
	Semi-natural dry grasslands and scrubland facies on calcareous substrates (*Festuco-Brometalia*) (*important orchid sites)	No Effect	N/A
	Petrifying springs with tufa formation (*Cratoneurion*)	No Effect	N/A
	Narrow-mouthed Whorl Snail *Vertigo angustior*	No Effect	N/A
	Sea Lamprey	No Effect	N/A
	River Lamprey	No Effect	N/A
	Harbour Seal	No Effect	N/A
Cummeen Strand SPA	Light-bellied Brent	No Effect	N/A
	Oystercatcher	No Effect	N/A
	Redshank	No Effect	N/A
	Wetland and Waterbirds	No Effect	N/A

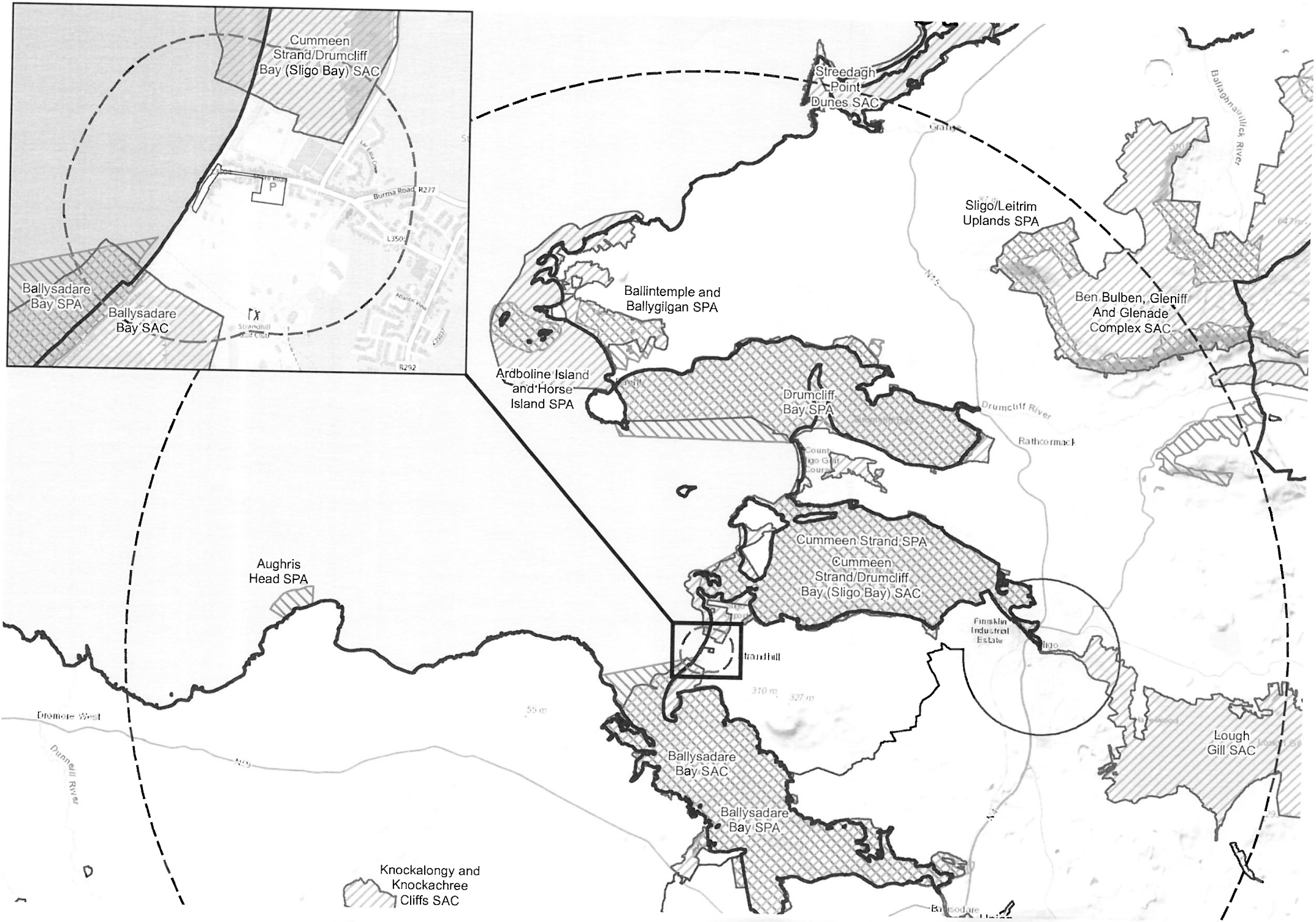
Appendix A

Development Design Drawings

Appendix B

Identification of Relevant European Sites




Cummeen
Strand/Drumcliff
Bay (Sligo Bay) SAC
Ballysadare
Bay SPA
Ballysadare
Bay SAC
Burma Road R277
L3502
R292
Streedagh
Point
Dunes SAC
Sligo/Leitrim
Uplands SPA
Ben Bulben, Gleniff
And Glenade
Complex SAC
Ballintemple and
Ballygilgan SPA
Ardboline Island
and Horse
Island SPA
Drumcliff
Bay SPA
Drumcliff River
Rathcormack
Cummeen Strand SPA
Cummeen
Strand/Drumcliff
Bay (Sligo Bay) SAC
Aughris
Head SPA
Finisklin
Industrial
Estate
Sligo
Strandhill
Dromore West
Dunneill River
Ballysadare
Bay SAC
Ballysadare
Bay SPA
Lough
Gill SAC
Knockalongy and
Knockachree
Cliffs SAC

Procedural Obstruction

Exhibit D

Corporate Services Section *Tel: (071) 91 11111* *Fax: (071) 91141119*
Email: foi@sligococo.ie

ALL FOI's REFUSED

20th January, 2022

VIA EMAIL
ainenicamhlaidh@gmail.com

Dear Ms McKirdy

I refer to the appeal which you made under the Freedom of Information Acts 2014 in response to our correspondence of 22nd December 2021

I am a more senior member of staff than the original decision maker in this case. I have decided today, 14th January 2022, to affirm the original decision made in relation to your request. This review of your request is an entirely new and separate decision.

From my investigations I have established that we received 55 Freedom of Information requests from you 2021, including 8 requests received over the weekend of 18th December.

The volume of requests submitted has impacted significantly on the work programme of the sections concerned and represents a pattern of manifestly unreasonable requests as provided for in the Freedom of Information Act 2014.

Having regard to the foregoing, I have decided to affirm the decision made by the original decision maker in relation to your request, and enclose for your information a copy of the relevant sections of the Act which this decision relies on.

You may make an 'application for review' of this decision to the Information Commissioner no later than 6 months from the date of this notification. There is a fee of €50 Payment should be made by way of bank draft, money order, postal order or personal cheque: crossed and made payable to the 'Office of the Information Commissioner'.

Alternatively you can make payment on-line which can be located at: https://www.oic.gov.ie/en/Apply-for-Review/Fees-Payable/ .

Should you wish to make such an 'application for review' in writing, please use the details below:

Office of the Information Commissioner,

6 Earlsfort Terrace,

Dublin, 2.

DO2 W773

Alternatively you may appeal using the Office of the Information Commissioner on-line application form which can be located at:

https://www.oic.gov.ie/en/apply-for-review/apply-for-review-online/

If an appeal is made by you and accepted, the Information Commissioner will fully investigate and consider the matter and issue a fresh decision.

Yours sincerely,

Jo... Moran
Senior Executive Officer

COMHAIRLE CHONTAE SHLIGIGH
SLIGO COUNTY COUNCIL
E info@sligococo.ie
W www.sligococo.ie

sligo.ie

Exhibit D

Gmail

Ann McKirdy <ainenicamhlaidh@gmail.com>

Withholding Dune / Erosion Report

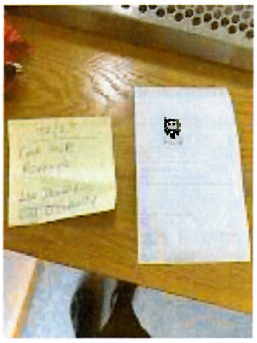
Ray O'Grady FOI 32/23

4 messages

Ann McKirdy <annmckirdy@icloud.com> Tue, Aug 22, 2023 at 10:06 AM
To: Ann McKirdy <ainenicamhlaidh@gmail.com>

2 years

Sent from my iPhone



IMG_5774.jpg
527K

Ann McKirdy <ainenicamhlaidh@gmail.com> Tue, Aug 22, 2023 at 10:14 AM
To: Ray O'Grady <rogrady@sligococo.ie>

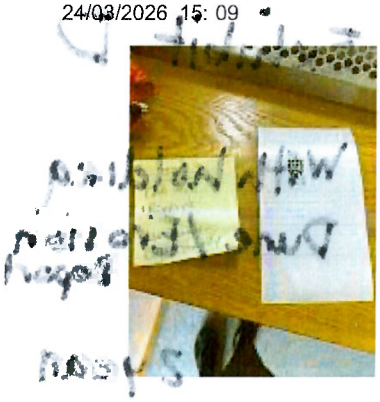
Dear Mr O'Grady,
I'm writing to request the fulfilment of my FOI. I paid the requisite fee on July 28th.
I have spoken to the Freedom of Information head office and they have advised that under the terms of Environmental FOI local authorities are obliged to respond within the time frame.
I look forward to receiving this.

I am alarmed that it is over eight months since Sligo Co Co received the report which took two years of research to publish on the dune system in Easkey and Strandhill and that it has still not been released.

Many thanks,
Sincerely,
Ann McKirdy

Attached photo of Sligo Co Co reception

---------- Forwarded message ----------
From: **Ann McKirdy** <annmckirdy@icloud.com>
Date: Tuesday, August 22, 2023
Subject: Ray O'Grady FOI 32/23
To: Ann McKirdy <ainenicamhlaidh@gmail.com>



IMG_5774.jpg
527K

Ray O'Grady <rogrady@sligococo.ie> Tue, Aug 22, 2023 at 12:55 PM
To: Ann McKirdy <ainenicamhlaidh@gmail.com>
Cc: Freedom of Information Sligo County Council <FOI@sligococo.ie>, Lisa Dennison <lmcgonigle@sligococo.ie>

Dear Ann,

Further to our conversation today and my conferral with The FOI Central Policy Unit in the Department of Public Expenditure and Reform please be advised that the payment of €10 submitted on the 28th of July in relation to FOI 32/23 does not comply with the requirements of the FOI Act, as search and retrieval fees are not subject to reduction as a medical card holder.

Should you wish to proceed with FOI 32/23 please pay the appropriate fees as outlined in correspondence dated 12th June 2023 and attached for ease of reference.

Regards,

Ray

Ray O'Grady,
A/Senior Executive Planner,
Local Enterprise Office,
Sligo County Council,
City Hall,
Quay Street,
Sligo.
F91PP44

+353-71-9114404
rogrady@sligococo.ie
sligococo.ie | sligo.ie

Sligo County Council
Comhairle Chontae Shligigh

Sligo.

[Quoted text hidden]

---

2 attachments

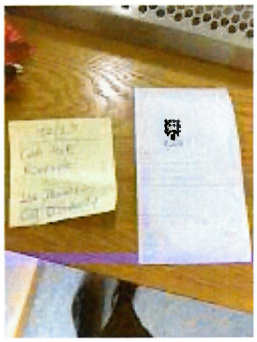
Section 27 Freedom of Information Act 2014.docx
17K

Notification of fees that are within the range for payment and require a deposit - Ann McKirdy - FOI 32-23.docx
2493K

Ann McKirdy <ainenicamhlaidh@gmail.com> Tue, Mar 24, 2026 at 3:53 AM
To: Ann McKirdy <ainenicamhlaidh@gmail.com>

---------- Forwarded message ---------
From: **Ann McKirdy** <annmckirdy@icloud.com>
Date: Tue, 22 Aug 2023 at 10:06
Subject: Ray O'Grady FOI 32/23
To: Ann McKirdy <ainenicamhlaidh@gmail.com>

Sent from my iPhone



IMG_5774.jpg
527K

Exhibit D

Gmail

Ann McKirdy <ainenicamhlaidh@gmail.com>

CCTV

Fwd: C -20-10-343 - data deleted

1 message

Ann McKir ainenicamhlaidh@gmail.com>
To: Ann Mc <ainenicamhlaidh@gmail.com>

---------- Forwarded message ---------
From: **Ann McKirdy** <ainenicamhlaidh@gmail.com>
Date: Fri, 11 Dec 2020 at 06:30
Subject: RE: C -20-10-343
To: DPC Info <info@dataprotection.ie>

Dear Mr. Doherty,

I am writing to request that you follow up. I am very very upset that I have been denied access to this CCTV. This is a time sensitive issue which the Sligo Co. Dat
do not add up. I have been thwarted by Sligo Co. Co in every possible manner as I have tried to access information regarding the controversial rezoning and subseq
and historically and ecologically sensitive area. It is in the corridor of an SAC in a Zone of Archaeological Potential, in a visually vulnerable area of National Histori
has gone in blocking my entire view of Sligo Bay, Benbulben and Coney Island.
The purpose of my visit to the Planning Office on August 10th was to see the Development Plan, the original variation when this site was purportedly rezoned. (This
access to it. I asked for the CCTV to prove my request was denied
it had fottage of the Planning Officer, Stephen Ward interrogating me as to why I should want to see an 'old plan'.
That evidence of my visit and the refusal by the Sligo Co Co to honour their legislative commitments to keep these records indefinitely has now disappeared.
I trust you will follow up on my behalf.

Sincerely,

Ann McKirdy

ATTACHED BELOW ARE THE ITEMS REQUESTED

new FOI

---------- Forwarded message ---------

From: **Ann McKirdy** <ainenicamhlaidh@gmail.com>

Date: Tue, Dec 8, 2020 at 7:39 AM

Subject: FOI - New Request

To: Sharon Malone <smalone@sligococo.ie>, <foi@sligococo.ie>

Dear Sharon,

Please submit a new FOI.

1-I would like to see CUBE Security's work order from August 24th when they were onsite.

2 -I would like to know who the engineer was and why Brenda Kilgallon Data Protection Officer was not present while data surveillence was being accessed.

3- I would like to know who was present for this secure data retrieval.

4- I would like to know to whom this USB card was given?

5. I would like to know why when it was discovered that the USB key was blank that the Data Protection Officer did not follow up immediately.

Thank you,

Sincerely,

Ann McKirdy

MY FOLLOW UP EMAIL _ received a telephone call in response to my FOI request

Hangouts CCTv Data Request SAR1520 / FOI 57/2

Meet New meeting
Join a meeting

Brenda Kilgannon <bkilgannon@sligococo.ie>

Ann McKirdy <ainenicamhlaidh@gmail.com>

City Hall Superintendent <CityHallSuperintendent@sligococo.ie>

Ann McKirdy <ainenicamhlaidh@gmail.com>

Brenda Kilgannon

Inbox

to me, Sharon

RE: Subject Access Request (SAR1520) for CCTV footage for Ann McKirdy

Dear Ms. McKirdy,

I am writing regarding your subject access request for the copy of CCTV footage of you from August 10th, 2020.

Firstly, let me apologise for the delays with regard to my promised response to provide you the chronological details surrounding your request. I wanted to have a full picture

Please find an account of the full details below;

- August 17th, 2020 – The City Hall Superintendent, Davis McLoughlin, received your request for a copy of your CCTV footage by email.
- August 21st, 2020 – David McLaughlin passed the request along to myself (DPO) and sent a confirmation email to you.
- August 21st, 2020 – I asked David to have the security company download the requested footage and we would review it for any needed redaction.
- August 24th, 2020 – Cube securities were asked to retrieve the footage from August 10th. They were onsite and downloaded the footage to a USB key.
- September 7th, 2020 – Due to Annual Leave in the interim, David and myself planned to review the footage for any necessary redaction on this date. David lo
- A request was made to Cube to fix the issue. The security company once again came onsite to try to download and were unable to make a copy of the recor
- September 30th, 2020 – I spoke to the director of Cube and insisted they try to restore the USB as the recording was now past 30 days and could no longer b
- October 9th, 2020 – Cube sent a qualified technician to look at the system and try to retrieve the footage. Both David and I were in attendance. On this date n system fully. Please find attached the work docket from Cube which describes the system issues.
- 21st October, 2020 – David wrote to Cube once again requesting corrective action for the system.
- 23rd October, 2020 - Cube came onsite and made corrective updates to the systems software.
- 11th November, 2020 –David confirmed to me that the system was updated and now operating effectively. Please note the following extract from his correspc "Corrective action was completed on 23/10/20.
  Unknown to us, up until then we did not have a retrieval capacity due to a technical fault with the software. This was only realised when the first request to retrieve f date she requested could not be retrieved due to the fault."

I hope this detail explains the situation. Unfortunately, due to these circumstances, we could not fulfil your data request.

to Tom, Brenda

Dear Brenda,

I am very disappointed by how my request has been handled. It is now November 24th, my request was submitted on August 17th. I wrote to you immediately following our received an email from Sharon Malone to advise me that you would follow up with me. I never gave my phone number to you. I recall how surprised you were when we spo displayed. This was replaced promptly following our conversation.

I am shocked that sensitive GDPR data protection is dealt with by the building superintendent and not the designated data protection officer.

I would like to see CUBE's work order from August 24th when they were onsite. I would like to know who the engineer was and why you were not present as Data Protectior I find it incredible actually that a USB was 'recorded' but returned blank.

This is a huge breach of data protection, moreover, it is unacceptable that David McLoughlin is communicating electronically to update staff on technical details using my na

The dates and details you describe do not match David McLoughlin's account per email below.

I am copying Mr. Tom Kilfeather on this email because it is completely unacceptable that there is a CCTV camera over the public desk, directly above and pointed at the des

The reason I requested this CCTV is that I was denied access to view the original Strandhill Mini Plan, 2011-2013, Variation 1, October 2013. I was interrogated by Barry W Development Plans. This is in breach of the Planning Act 2000.

Sincerely,
Ann McKirdy

to dpofficer, me

Ann,

We have contacted our CCTV Service Provider to retrieve the requested footage. Once this is provided to us we will then need to have all images of persons and/ or materi reliant on other parties timeframes. Therefore, I am not in a position to advise when this will be issued but we will endeavour to have it furnished to you at the earliest conve

Thank you for your patience and understanding while this request is processed.

to City

Thank you, there was no other member of the public in the office at the time. The staff were behind the glass screened counter.
Sincerely,
Ann McKirdy

5 Attachments

11 attachments

image026.png
2K

Sligo County Council Comhairle Chontae Shligigh Sligo. **image027.jpg**
6K

~WRD000.jpg
1K

image024.png
1K

image020.png
1K

image021.jpg
1K

image025.png
1K

image022.jpg
1K

image023.png
1K



icon.png
2K

image019.jpg
1K

COMHAIRLE CHONTAE SHLIGIGH SLIGO COUNTY COUNCIL
E info@sligococo.ie
W www.sligococo.ie
Corporate Services Section *Tel: (071) 91 11111 Fax: (071) 91141119 Email: foi@sligococo.ie*

Our Ref. FOI 20/21

20th April 2021

By e-mail

ainenicamhlaidh@gmail.com

Dear Ms McKirdy,

I refer to your request received under the Freedom of Information Act, 2014 for records held by Sligo County Council.

In this regard, I wish to advise that I am unable to grant this request under Section 15(1)(a) of the FOI Act which states than an FOI request may be refused if:

'the record concerned does not exist or cannot be found after all reasonable steps to ascertain its whereabouts have been taken'

In regards to the first part of your request which states;
Extract

'I'm writing to request all details of the Environmental Assessment (1. when it was carried out, 2. by whom and 3.when was it approved by the County Manager and 4. County Councillors) which approves the creation of the Killaspugbrone Looped trail over the Strandhill Marram Grass Dunes'

Response
No EIA (Environmental Impact Assessment) was prepared for the existing Killaspugbrone Looped trail in the 'Strandhill Special Area of Conservation'. There are no records or documents of the nature requested.

In regards to the second part of your request which states;
Extract

'In addition, I would all the specifics for the Environmental Assessment (1. when it was/will be carried carried out, 2. by whom and 3.when it was/ will be approved by the County Manager and 4. County Councillors) which was undertaken for the proposed new paths over the dunes in Strandhill and any future proposals to link the village to the car park with paths over the dunes.

Response
Sligo County Council are unaware of any EIA documentation available in this regard

COMHAIRLE CHONTAE SHLIGIGH SLIGO COUNTY COUNCIL
E info@sligococo.ie
W www.sligococo.ie

In the event that you are not happy with this decision you can make an appeal in relation to this matter by writing to the Freedom of Information Unit, Sligo County Council, County Hall, Riverside, Sligo, F91 Y763 or by e-mail to foi@sligococo.ie You should make your appeal within 4 weeks (20 working days) from the date of this notification, where a day is defined as a working day excluding, the weekend and public holidays, however, the making of a late appeal may be permitted in appropriate circumstances. In relation to an appeal regarding this decision there is a fee payable in the amount of €30. The appeal will involve a complete reconsideration of the matter by a more senior member of the staff of this body.

In the event that you need to make such an 'application for review' you can do so by writing to:
The Office of the Information Commissioner
18 Lower Leeson Street, Dublin 2, DO2 HE97

Should you write to the Information Commissioner making an appeal, please either refer to this letter or enclose a copy. Alternatively you may appeal using the Office of the Information Commissioner on-line application form which can be located at:
https://www.oic.gov.ie/en/apply-for-review/apply-for-review-online/

If an appeal is made by you and accepted, the Information Commissioner will fully investigate and consider the matter and issue a fresh decision.

Yours sincerely,

Brenda Kilgannon

FOI Officer

Gmail **Ann McKirdy <ainenicamhlaidh@gmail.com>**

Att: Damian Cahill- FOI 20_21 Response

2 messages

Ann McKirdy <ainenicamhlaidh@gmail.com> Fri, Apr 23, 2021 at 9:27 AM
To: OIC Applications Shared Mailbox <applications@oic.ie>

Dear Damian,
I am writing to request guidance. My FOI has been refused. Like I have responded to Sligo Co Co, I know this document exists. It has been buried as it categorically states development of walking trails on the SAC would be detrimental to the biodiversity.
Yet, those trails are now part of a Lub Naisunta, the dunes on the seaward side of all of these trails have collapsed into the sea. This is a fragile ecosystem, and has always been.
Sligo has now revived funding from OPW to research defences for dune erosion management. Yet, their own Environment Impact Assessment was ignored. This is not correct.
Please advise how to proceed with my FOI. I've requested an Internal Review on this Foi which has been refused.
Sincerely,
Ann McKirdy

---------- Forwarded message ----------
From: **Ann McKirdy** <ainenicamhlaidh@gmail.com>
Date: Wednesday, April 21, 2021
Subject: FOI 20_21 Response
To: Brenda Kilgannon <bkilgannon@sligococo.ie>

Dear Brenda,
I would like to request an INTERNAL REVIEW of my request. I have read the Environmental Impact Assessment and have noted the negative impact the proposed development of a looped trail would have on the Special Area of Conservation. I am requesting this information and all of the items specified in my FOI request.
It is a legal mandate to do an Environmental Impact Assessment for all developments in Special Areas of Conservation.
Please escalate my request.
Many thanks,
Sincerely,
Ann McKirdy

On Tue, Apr 20, 2021 at 4:39 PM Brenda Kilgannon <bkilgannon@sligococo.ie> wrote:

> Dear Ms. McKirdy,
>
> Please find attached Sligo County Council's response to your recent FOI request.
>
> Kind Regards,
>
> *Brenda Kilgannon*
>
> *Data Protection & FOI Officer*
>
> *Sligo County Council*
>
> *County Hall,*
>
> *Riverside,*
>
> *Sligo*

PH: 071 911 1301

Email: dpofficer@sligococo.ie / foi@sligococo.ie

Ann McKirdy <ainenicamhlaidh@gmail.com> Tue, Mar 24, 2026 at 8:05 AM
To: Ann McKirdy <ainenicamhlaidh@gmail.com>

[Quoted text hidden]

Killaspugbrone

COMHAIRLE CHONTAE SHLIGIGH SLIGO COUNTY COUNCIL

E info@sligococo.ie
W www.sligococo.ie

Corporate Services Section *Tel: (071) 91 11111* *Fax: (071) 91141119* *Email: foi@sligococo.ie*

Our Ref: FOI 20/21

24th March, 2021

VIA EMAIL
ainenicamhlaidh@gmail.com

Dear Ms McKirdy,

I refer to your request received on 22nd March, 2021, which you made under the Freedom of Information Act, 2014 for records held by Sligo County Council.

Your request sought information, specifically:

All details of the Environmental Assessment (1. when it was carried out, 2. by whom and 3.when was it approved by the County Manager and 4. County Councillors) which approves the creation of the Killaspugbrone Looped trail over the Strandhill Marram Grass Dunes. In addition, I would all the specifics for the Environmental Assessment (1. when it was/will be carried carried out, 2. by whom and 3.when it was/ will be approved by the County Manager and 4. County Councillors) which was undertaken for the proposed new paths over the dunes in Strandhill and any future proposals to link the village to the car park with paths over the dunes.

A final decision on your request would normally be sent to you within 4 weeks, where a week is defined as 5 working days excluding the weekend and public holidays. This means that you can expect a decision letter to issue not later than **21st April, 2021.**

There are some limited situations under the FOI Act which could mean that the period for a final decision may be longer than this 4 week period. If this occurs in the case of your request, you will be advised promptly in writing setting out the reason and the new decision date.

COMHAIRLE CHONTA ESHLIGIGH SLIGO COUNTY COUNCIL

E info@sligococo.ie
W www.sligococo.ie

Should our final decision not reach you on time, please feel free to contact the decision maker named above to discuss any problems that may have arisen. If you have not heard from us once the allotted time has expired, you are automatically entitled to appeal for a review of the matter. This review proceeds on the legal basis that the initial request is considered to be refused once the specified time for responding to it has expired. The review is a full and new examination of the matter carried out by a more senior member of staff.

In the event that you need to request such a review, you can do so by writing to FOI Unit, Sligo County Council, County Hall, Riverside, Sligo or alternatively by sending an e-mail to foi@sligococo.ie.

You should state that you are seeking this review because an initial decision was not sent to you within the time allowed for a response. In that event, you would normally have 4 weeks (after the initial decision should have been sent to you) in which to make the appeal and is subject to a fee of €30. The Council must complete the review within 3 weeks. Consideration will be given to late applications in appropriate circumstances.

You are then entitled to seek a further independent review of the decision if you are not satisfied with the decision on the review of this case, or if you have not heard from us once the allotted time has expired.

You are entitled to appeal the matter by writing to the Information Commissioner at the following address: Office of the Information Commissioner, 18 Lower Leeson Street, Dublin 2; Tel 01 6395689; Fax: 01 6395674, email: info@oic.gov.ie .

Yours sincerely,

Pp *S Malone*
FOI Officer

Gmail Ann McKirdy <ainenicamhlaidh@gmail.com>

CCTv Data Request SAR1520 / FOI 57/20

5 messages

Brenda Kil[illegible]on <bkilgannon@sligococo.ie> Tue, Nov 24, 2020 at 2:27 PM
To: Ann Mck[illegible] <ainenicamhlaidh@gmail.com>
Cc: Sharon Malone <smalone@sligococo.ie>

RE: Subject Access Request (SAR1520) for CCTV footage for Ann McKirdy

Dear Ms. McKirdy,

I am writing regarding your subject access request for the copy of CCTV footage of you from August 10th, 2020.

Firstly, let me apologise for the delays with regard to my promised response to provide you the chronological details surrounding your request. I wanted to have a full picture and was awaiting final confirmation from the security company.

Please find an account of the full details below;

- August 17th, 2020 – The City Hall Superintendent, Davis McLoughlin, received your request for a copy of your CCTV footage by email.
- August 21st, 2020 – David McLaughlin passed the request along to myself (DPO) and sent a confirmation email to you.
- August 21st, 2020 – I asked David to have the security company download the requested footage and we would review it for any needed redaction.
- August 24th, 2020 – Cube securities were asked to retrieve the footage from August 10th. They were onsite and downloaded the footage to a USB key.
- September 7th, 2020 – Due to Annual Leave in the interim, David and myself planned to review the footage for any necessary redaction on this date. David looked at the USB at some point prior to this meeting and found that the USB was blank.
- A request was made to Cube to fix the issue. The security company once again came onsite to try to download and were unable to make a copy of the recorded data.
- September 30th, 2020 – I spoke to the director of Cube and insisted they try to restore the USB as the recording was now past 30 days and could no longer be downloaded. I called you and explained our situation.
- October 9th, 2020 – Cube sent a qualified technician to look at the system and try to retrieve the footage. Both David and I were in attendance. On this date nothing could be downloaded from any time period. There was a technical error with the system and they needed to come back and update the system fully. Please find attached the work docket from Cube which describes the system issues.
- 21st October, 2020 – David wrote to Cube once again requesting corrective action for the system.
- 23rd October, 2020 - Cube came onsite and made corrective updates to the systems software.
- 11th November, 2020 –David confirmed to me that the system was updated and now operating effectively. Please note the following extract from his correspondence:

"Corrective action was completed on 23/10/20.

Unknown to us, up until then we did not have a retrieval capacity due to a technical fault with the software. This was only realised when the first request to retrieve footage was received, by Ann McKirdy, and was therefore highlighted and corrected as a result. This took some time to complete. Unfortunately the date she requested could not be retrieved due to the fault."

I hope this detail explains the situation. Unfortunately, due to these circumstances, we could not fulfil your data request.

Please let me know if you have any further questions.

Brenda Kilgannon

Data Protection Officer

Sligo County Council

County Hall,

Riverside,

Sligo

PH: 071 911 1301

Email: dpofficer@sligococo.ie

City Hall Sligo - 09_10_20 - 301059.pdf
201K

Ann McKirdy <ainenicamhlaidh@gmail.com>
To: Brenda Kilgannon <bkilgannon@sligococo.ie>
Cc: Tom Kilfeather <tkilfeather@sligococo.ie>

Dear Brenda,

I am very disappointed by how my request has been handled. It is now November 24th, my request was submitted on August 17th. I wrote to you immediately following our conversation data. I was not emailed, instead, I received an email from Sharon Malone to advise me that you would follow up with me. I never gave my phone number to you. I recall how surprised instead, the mobile telephone for the building superintendent was displayed. This was replaced promptly following our conversation.

I am shocked that sensitive GDPR data protection is dealt with by the building superintendent and not the designated data protection officer.

I would like to see CUBE's work order from August 24th when they were onsite. I would like to know who the engineer was and why you were not present as Data Protection Officer. I wo I find it incredible actually that a USB was 'recorded' but returned blank.

This is a huge breach of data protection, moreover, it is unacceptable that David McLoughlin is communicating electronically to update staff on technical details using me as a refe

The dates and details you describe do not match David McLoughlin's account per email below.

I am copying Mr. Tom Kilfeather on this email because it is completely unacceptable that there is a CCTV camera over the public desk, directly above and pointed at the desk in the Plan public to view files.

The reason I requested this CCTV is that I was denied access to view the original Strandhill Mini Plan, 2011-2013, Variation 1, October 2013. I was interrogated by Barry Ward as to why Planning Office do not keep outdated Development Plans. This is in breach of the Planning Act 2000.

Sincerely,
Ann McKirdy

City Hall Superintendent <CityHallSuperintendent@sligococo.ie>
to dpofficer, me

Ann,

We have contacted our CCTV Service Provider to retrieve the requested footage. Once this is provided to us we will then need to have all images of persons and/ or materials unre us we are reliant on other parties timeframes. Therefore, I am not in a position to advise when this will be issued but we will endeavour to have it furnished to you at the earliest c

Thank you for your patience and understanding while this request is processed.

Ann McKirdy <ainenicamhlaidh@gmail.com>
to City

Thank you, there was no other member of the public in the office at the time. The staff were behind the glass screened counter.
Sincerely,
Ann McKirdy

[Quoted text hidden]

5 attachments

image025.png
1K

image024.png
1K

image023.png
1K

image026.png
2K

Sligo County Council Comhairle Chontae Shligigh Sligo. **image027.jpg**
6K

Brenda Kilgannon <bkilgannon@sligococo.ie>
To: Ann McKirdy <ainenicamhlaidh@gmail.com>
Cc: Tom Kilfeather <tkilfeather@sligococo.ie>

Dear Ms. McKirdy,

Please see my response to the points made in your email below;

- Data Subjects have the right of access to their data. The normal process is that I receive all requests as the DPO and these are distributed to the relevant department for actio there is any issue.
- David did not electronically update staff regarding your subject access request. He responded directly to me, as DPO, as to whether the technical issues with the CCTV system
- The camera which is facing the desk in the planning office is there for security purposes only.

Once again, I apologise that there were technical difficulties with the equipment and there was no way for us to fulfill this request.

If you are not satisfied with the outcome of the response you received from Sligo County Council in relation to your request, then you are entitled to make a complaint to the Data

The Office of the Data Protection Commissioner's website is www.dataprotection.ie or you can contact their Office at:

Lo Call Number: 1890 252 231

E-mail: info@dataprotection.ie

Postal Address: Office of the Data Protection Commissioner
Canal House
Station Road
Portarlington,
Co. Laois. R32 AP23.

Kind Regards,

[Quoted text hidden]
[Quoted text hidden]

City Hall Superintendent <CityHallSuperintendent@sligococo.ie>

to dpofficer, me

Ann,

We have contacted our CCTV Service Provider to retrieve the requested footage. Once this is provided to us we will then need to have all images of persons and/ or materials unre timeframes. Therefore, I am not in a position to advise when this will be issued but we will endeavour to have it furnished to you at the earliest convenience.

Thank you for your patience and understanding while this request is processed.

Ann McKirdy <ainenicamhlaidh@gmail.com>

to City

[Quoted text hidden]

[Quoted text hidden]

Ann McKirdy <ainenicamhlaidh@gmail.com> Tue, Dec 10, 2024 at 11:42 PM
To: Eoin Brady <eoin.brady@fplogue.com>

Sligo co co deleted my data after my request for a copy of my CCTV.

This is the record that I had requested first visit to office, first day open to public. My inquiry about the rezoned land in my cul de sac which never was officially rezoned.

Monahan heir to Doyle Hotel group got the land rezoned because he wanted to build on it, no record exists that it was legally rezoned.

In 2013 one site rezoned, this was requested for rezoning but not rezoned.
[Quoted text hidden]

City Hall Sligo - 09_10_20 - 301059.pdf
201K

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

Tue, Mar 24, 2026 at 3:57 AM

[Quoted text hidden]

City Hall Sligo - 09_10_20 - 301059.pdf
201K

Gmail Proposal 1 opposed Ann McKirdy <ainenicamhlaidh@gmail.com>

SERIOUS CONCERN - URGENT- following the Formal Complaint SAC - Dunes Strandhill and proposal for further paths over the SAC

11 messages

Ann McKirdy <ainenicamhlaidh@gmail.com>
To: natureconservation@housing.gov.ie

Thu, Jul 15, 2021 at 5:57 PM

To whom it may concern,
I am notifying the National Parks and Wildlife of another proposed path in Killaspugbrone, Strandhill. This proposal is to run a path over the SAC by the National Heritage sure to bring people to the Killaspugbrone beach and Dorrins Strand.
This is an SAC. The impact of the paths which have been installed already have caused extensive irreversible damage over these special areas of biodiversity and conservation. The dunes have been decimated by tramping. I have reported adults coming down the dunes on toboggans, up to 20 texts inside the dunes system where revellers come to party. Moreover, the Sligo Co Co gave permission to the film makers of Ireland's Fittest Family to film the challenge of timed running up the dune face in Shelly Valley, Strandhill. This was broadcast several times on National TV. I have intercepted several football teams , squads of young men, from Sligo Leitrim and Roscommon and alerted them to the SAC status of the dunes and the prohibition for tramping.
It's a disgrace that the Sligo Co Co has not done a proper appropriate assessment. They have advised that in the screening process in conjunction with the NPWS this was not seen to have an impact on the SAC due to the limited scope of potential damage to the SAC. This is outrageous.

The Sligo Tourism has campaigned heavily and promoted this area for tourism, the paths are overrun.

This is not a minor scale, this is decimation on a grand scale.

To whom shall I address my concern? Is this within the remit of the NPWS ? An investigation needs to be undertaken urgently. This is an environmental catastrophe.

Please advise,
Sincerely,
Ann McKirdy

---------- Forwarded message ----------
From: **Siobhan Gillen** <sgillen@sligococo.ie>
Date: Thursday, July 15, 2021
Subject: Formal Complaint SAC - Dunes Strandhill and proposal for further paths over the SAC
To: Ann McKirdy <ainenicamhlaidh@gmail.com>

15th July 2021

By e-mail:

ainenicamhlaidh@gmail.com

RE: Complaint to Chief Executive on 9th July 2021

Dear Ms McKirdy,

I acknowledge receipt of your complaint in relation to the development of the Killaspugbrone Looped Walking Trail. In particular, you question the lack of an Appropriate Assessment being carried out prior to undertaking this project.

Under the Habitats Directive, an appropriate assessment is required if a project has the potential to have a significant effect on the Natura 2000 network of designated sites. As part of the preparation of the Killaspugbrone Looped Trail in 2014, the proposed works were screened by Sligo County Council to determine whether or not they would have significant effects on either the Cummeen Strand / Drumcliff Bay SAC or the Cummeen Strand SPA. This screening process was carried out in consultation with the National Parks and Wildlife Service of the Department of Arts, Heritage and the Gaeltacht and concluded that:

'Having regard to the limited scale of the proposed development and the fact that it will not impact on the qualifying interests of the Cummeen Strand / Drumcliff Bay SAC and the Cummeen Strand SPA, it can be objectively concluded that there are not likely to be significant effects on the Natura 2000 sites arising from the proposed development.'

On the basis of the above determination, a full appropriate assessment was not required to be undertaken in respect of the proposed Looped Trail project.

With regard to your wider concerns about the effects of human activities on our sensitive coastal dunes, it is acknowledged that unmanaged trampling by beach visitors places significant pressure on these vulnerable ecosystems. The use of managed trails like the Killaspugprone Looped Walking Trail combined with appropriate signage (both wayfinding and educational) are well accepted measures to reduce the negative impacts associated with the high volume of recreational usage that these areas are going to attract.

We will continue to work closely with the National Parks and Wildlife Service in the design and ecological assessments of all future walking trails and, where planned in areas within or in close proximity to Natura 2000 sites, that we ensure that they are consistent with the conservation objectives for these designated sites.

Yours sincerely,

Siobhán Gillen
Administrative Officer

Planning Section

Sligo County Council,

City Hall, Quay Street, Sligo, F91 PP44

+353-71-9114440

+353-872905263
sgillen@sligococo.ie
sligococo.ie | sligo.ie

My Submission was excluded

Excluded

2023 Dev. Plan Submission

Sligo County Council Draft Local Authority Climate Action Plan 2024-2029

Inbox
Search for all messages with label Inbox
Remove label Inbox from this conversation

A

Ann McKirdy <ainenicamhlaidh@gmail.com>

Waste Water Treatment

Dec 18, 2023, 10:21 PM

to climate

I object to the Sligo Co Climate Action Plan objectives itemised below given the fact that the WWTP in Strandhill has not been assessed for impact on the Environment.

There is a statutory requirement for the Co. Sligo Climate Action Plan to be screened to ascertain whether it has any significant impact on any natura 2000 site. Strandhill Waste Water Treatment Plant was built without having adhered to the EU Habitats Directive for Appropriate Assessment. The Part 8 - Planning - for the 2021 Development was undertaken 14 years prior, in 2007. There are huge anomalies. An environmental impact assessment cannot be undertaken retrospectively. The WWTP is located on an SAC, dumps into an SAC where surfers (bathers) are exposed to dangerous pathogens, moreover, this WWTP is located less than 1km from the Coney Island Oyster Farm.

Strategic Environmental Objectives

Climate Change : Promote development resilient to the effects of climate change - **The Draft Development Plan rezoning of lands in Strandhill for high density development bordering the dunes systems is not aligned with this objective.**

Population and Human Health - Safeguard the Sligo's citizens from environment related rpressures and risks to health and well being including air, water and noise pollution, climate change and flooding - **The proposal to develop land for high density housing in Strandhill is not aligned with this strategy. The Waste Water Treatment Plant on the SAC dumping into the SAC did not adhere to the regulations governing development on the SAC under the EU Habitats Directive - No Appropriate Assessment was undertaken. This area is a very popular surf destination and a protected Special Area of Conservation, moreover, there is an Oyster farm within 1km from this WWTP.**

Submission 2023
Excluded

Safeguard the county's citizens from environment related pressures and risks to health and well being - **again - The proposal to increase the residential population and the load on the WWTP contradicts this objective.**

Biodiversity Flora and fauna - To preserve protect, maintain and where appropriate enhance the terrestrial aquatic and soil biodiversity, particularly EU Designated sites and protected species - The New Draft Development Plan 2024 will negatively impact on this strategic objective.

Ensure no adverse effects on the integrity of any European site with regard to its qualifying interests associated conservation status, structure and function. - **Sligo Co. Co. amendment to the designation of Strandhill as a Satellite Village for Development in the Draft Amendment will have a detrimental impact on the status of the SAC's and SPA's as well as on the UNESCO bid world heritage site, Knocknarea.**

To protect maintain and conserve the County's natural capital - **The proposal to develop on R292 which is designated visually vulnerable will have a detrimental impact on the County's Natural capital.**

Water

Avoid inappropriate zoning and development in areas at risk of flooding and areas that are vulnerable to current and future erosion, including coastal areas - Again - the proposal to rezone for high density housing by St. Patrick's Church and Scoil Asicus Naofa school will have a hugely negative impact on the dunes system. The houses in the housing estate behind the proposed rezone have had huge problems with sinking due to being built on unstable sand.

AIR

To avoid, prevent or reduce harmful effects on human health and the environment as a whole resulting from emissions to air from all sectors. The WWTP in Strandhill is emitting a noxious smell - this becomes even more exacerbated following a dry spell of weather.

Theme 5 - Environment - and Biodiversity
30 - 'Develop a Biodiversity Action Plan for Co Sligo which addresses all of the relevant climate related issues and includes appropriate actions which supports green and blue infrastructure.

33 Continue to monitor coastal erosion along Sligo Shoreline and maintain existing sea defences considering application of nature based solutions and in live with conservation management objectives of European Sites.

The mission statement for Sligo County Council Climate Action is:

Sligo Co. Co. will become a leader in Climate action, by working with communities and businesses to assist them in finding the best ways for them to reduce their GHG emissions, with a focus on the opportunities in the transport and heating related areas as well as on protecting and enhancing biodiversity.
Goal 3 pg 69 LECP

In a submission to the Sligo Development Plan 2017-2023 by the **Office of the Planning Regulator** the regulator reiterated the **fact that Strandhill is *not* a Key Support Town**. This was changed in the new Co. Sligo Development Plan 2024 outside of the correct Development Planning Process. It was proposed by the David Minton, Manager of the WRA and adopted without public consultation in the Planning Process.

> Chief Executive's Report on submissions and observations received in relation to the Draft Variation No. 1 of Sligo County Development Plan 2017-2023 21 September 2020 - Issue no. 14 (NWRA recommendation on DA-20) "The proposed amendments are generally considered appropriate but would benefit from amending the term 'Key Support Town' to 'Support Towns' or an alternative term – to avoid confusion with the 'Key Towns' of the RSES as referred to above under No.17. Furthermore, it would be appropriate to include the villages of Ballysadare, Strandhill and Rosses Point under the heading of the Sligo RGC"

Sligo Co. Co. has a legal obligation under EU Law to comply with the protection status of the Special Areas of Conservation and undertake an Environmental Impact Assessment for every development proposal in or adjacent to the SAC.

22
Ballysadare Bay SAC
Humid dune slacks [2190], Harbour seal (Phoca vitulina) [1365], Estuaries [1130], Mudflats and sandflats not covered by seawater at
low tide [1140], Narrow mouthed Whorl Snail (Vertigo angustior) [1014], Fixed coastal dunes with herbaceous vegetation grey dunes [2130],
Embryonic shifting dunes [2110], Shifting dunes along the shoreline with Ammophila arenaria white dunes [2120]

627
Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC
Shifting dunes along the shoreline with Ammophilaarenaria
white dunes [2120], Estuaries [1130], Embryonic shifting dunes [2110], Narrow mouthed whorl snail (Vertigo angustior) [1014], Seminatural dry grasslands and scrubland facies on calcareous substrates (Festuco Brometalia) * important
orchid sites [6210], River lamprey (Lampetra fluviatilis) [1099], Fixed coastal dunes with herbaceous vegetation grey dunes [2130], Mudflats and sandflats not covered by seawater at low tide [1140], Harbour seal (Phoca vitulina) [1365], Juniperus communis formations on heaths or calcareous grasslands [5130], Sea lamprey
(Petromyzon marinus) [1095], Petrifying springs with tufa formation (Cratoneurion) [722

SPAs within County Sligo and within a
15km Buffer Zone of the County
4129 Ballysadare Bay SPA Wetland and Waterbirds [A999], Bartailed Godwit (Limosa lapponica) [A157], Light bellied Brent Goose (Branta bernicla hrota) [A674], Grey Plover (Pluvialis squatarola) [A141], Dunlin (Calidris alpina) [A149], Redshank (Tringa totanus) [A162]
4035
Cummeen Strand SPA
Redshank (Tringa totanus)[A162], Wetland and Waterbirds [A999], Oystercatcher (Haematopus ostralegus) [A130], Light bellied Brent Goose (Branta bernicla hrota) [A674]
4013
Drumcliff Bay SPA
Wetland and Waterbirds [A999], Sanderling (Calidris alba) [A144], Bartailed Godwit (Limosa lapponica) [A157]

EPA'S Report 429 identified the climate change risks to Ireland's coastal communities highlighting the importance of building national resilience across socio-ecological and economic systems.

Sligo Co. Co. agreed to implement the recommendations of this report in the Draft Development Plan 2024 which identifies coastal erosion and tourism as two primary pressures along with flooding. These pressures are evident in Strandhill, particularly since 2016 saw the opening of the National Looped Trail across the Dunes and the Salt Marshes which has caused major damage to the dunes systems and biodiversity.

Yours faithfully,

Aine Nic Amhlaidh

Larass, Strandhill, Sligo

A

Ann McKirdy <ainenicamhlaidh@gmail.com> Dec 19, 2023, 3:35 PM

to climate

To whom it may concern,
Please confirm receipt.
Thank you,
Ann mcKirdy

P

Pete Murtagh <pmurtagh@sligococo.ie>

Dec 19, 2023, 4:07 PM

to me

Dear Ms. Nic Amhlaidh,

We acknowledge receipt of your submission in relation to the Sligo County Council Draft Local Authority Climate Action Plan 2024-2029.

Regards,

Pete Murtagh
Energy Efficiency & Climate Action Officer
Environment Section
Sligo County Council
County Hall
Riverside
Sligo

"Don't waste anything"

+353-0719111254
+353-087 1306858
pmurtagh@sligococo.ie
sligococo.ie | sligo.ie

From: Ann McKirdy <ainenicamhlaidh@gmail.com>
Sent: Tuesday, December 19, 2023 3:35 PM
To: Climate <Climate@sligococo.ie>
Subject: Re: Sligo County Council Draft Local Authority Climate Action Plan 2024-2029

Some people who received this message don't often get email from ainenicamhlaidh@gmail.com. Learn why this is important

A

Ann McKirdy <ainenicamhlaidh@gmail.com>

Dec 19, 2023, 6:22 PM

to Pete

Thank you, will you upload or do I need to upload ?
Thanks! Ann McKirdy

A

Ann McKirdy

3:33 PM (0 minutes ago)

to climate

To whom it may concern,
I'm writing to follow up on the Draft Climate Action Plan.
My submission which has been confirmed is not online nor has it been reported on.
Please send me the feedback from the Manager's Assessment of my submission.
Many thanks,
Sincerely,
Ann McKirdy

A

Reply Forward
Add reaction

Again My submission Excluded

Gmail

Ann McKirdy <annmckirdy@gmail.com>

marecasserly1@gmail.com ,dbree@eircom.net, paultaylorsligo@gmail.com, keithhenrysligo@gmail.com

9 messages

Ann McKirdy <annmckirdy@gmail.com> Wed, Nov 30, 2016 at 1:27 PM
To: hubertkeaney@hotmail.com, Rosaleen O Grady <ogradyrosaleen@eircom.net>, Gino O Boyle <ginopbp@outlook.com>, Tom MacSharry <tommacsharry@hotmail.com>, Sinead Maguire <sineadmaguire@yahoo.com>, Sean Mcmanus <seanmacmanus@eircom.net>, skilgannonsligo@gmail.com, thealyt@gmail.com, queenanjoseph@eircom.net, dfmulvey@gmail.com, cllrjerrylundy@eircom.net, gormleymargaret@eircom.net, cllrmbaker@gmail.com, Michael Clarke <cllrmichaelclarke@eircom.net>

Dear Mr Keaney, Cathaoirleach and members of the Sligo County Council,

I am writing to you with regards to your request from the public to make submissions on the Sligo County Development Plan 2017-2023.

First and foremost, I would like to take this opportunity to express my thanks to Councillors, Sinead Maguire, Declan Bree, Sean MacManus, Marie Casserley and Tom MacSharry for your tireless work on behalf of the Strandhill/Coolera communities.

Accuracy of Draft Plan based on inaccurate residential numbers

I believe there are a number of issues regarding development in Strandhill that need to be addressed. First and foremost, I note that the new Census for this area will not be finalised until mid 2017. I believe that the resident population of Strandhill has increased significantly since the last census and the community is on par with larger towns of 2,000 and above. Thus, the draft plan for this area does not match the requirements for this community as the number of residents is under represented given that the plan is based on the previous census.

Community Center

I note there is mention in the Draft Plan of the need for a Community Center in Strandhill, however, there is no concrete plan to proceed with this. Given the increase in population and the development of this area and growing popularity due to the Wild Atlantic Way Promotion. The sustainability of the *community* depends on the development of this community, we desperately need a Community Center to nurture the community spirit and provide a space for young and old to come together. The Strandhill Community has seen the development of the Killaspugbrone looped trail, the Knocknarea Mountain path and the Development Plan 2017-2023 clearly outlines the intention to develop tourism further. These tourism initiatives boost tourism, however, the environmental impact has been detrimental and the impact on the community is unwelcome; increased traffic and noise, increased pollution, congestion etc. The inclusion of a Community Centre is an initiative that would serve young and old, residents and visitors. I believe it would develop the community spirit which would promote well-being and tolerance. I believe that a portion of the funding that has been allocated to Sligo Leader needs to be ear marked for the development of a Community Center in Strandhill.

Pedestrian Safety

Submission 2016
Excluded =

The Killaspugbrone Looped trail and the Knocknarea hill walk have resulted in a huge increase in the number of walkers and pedestrians on our roads, however, the village has not seen any investment in improved infrastructure for the community. There is a large population of school going children living in Dorrins Strand who walk to and from Scoil Asicus Naofa, every day. There has been no improvement in footpaths or infrastructure in spite of the increase in usage and the huge increase in traffic. This is unconscionable.

My question is, who benefits from tourism? I believe the Community should, not just businesses. It is my belief that children, vulnerable children aged 4-12 who walk to school (in semi darkness in the winter) should be prioritised over plans to develop paths for tourists. The Community needs footpaths, more pedestrian crossings (particularly at the roundabout) and improved street lighting. I acknowledge Sinead Maguire's work to promote road safety in Strandhill.

Looped Trail

Killaspugbrone Looped Trail and sustainable development

I would like to bring to your attention that there was no public consultation on the development of the Knocknarea Mountain walk or the Killaspugbrone looped trail. The latter of which is in the Ballysadare Bay Special Area of Conservation, this Killaspugbrone looped trail directs walkers across delicate dunes with a fragile ecosystem. The Sligo County Council has been tasked with the preservation of this delicate eco system and is in breach of its duty. It should never have opened a National Looped Trail across these dunes.

I have read and carefully studied the Sligo County Council's Assessment for this site, it is not an accurate assessment and is based on the *false premise* that there was an existing looped trail in use over this site. I have documentary evidence and local knowledge that contradicts this. This path cannot be sustained. The County Council own signage is admission that the level of traffic over these dunes is unprecedented.

The Council has access to the European Special Area of Conservation reports, however, the survey that was completed to assess this site was inadequate and completely flawed. Per the European Special Area of Conservation recognition of this site, '*00622, threats to the site includes ; Recreational/ Amenity use, Erosion (natural and anthropogenic) Tourism Related development , Introduction of invasive species and illegal dumping.*' These dunes have been decimated by the opening of the Killaspugbrone Looped trail.

The Sligo County Council's 2017-2023 plan is to maintain existing trails and further establish looped trails. No further trails can be approved without adequate research into the environmental impact on the special areas of conservation and consultation with the community. The current trail, the Killaspugbrone loop is in severe contravention of the Habitat Directive for this SAC and if it is to remain open will need to have a raised path installed to contain walkers. This path is unmonitored and is frequently used by horseback riders.

Dune Management

There has been some fencing of the dunes to the left of the promenade in Strandhill to prevent walkers tramping the dunes, however, to date there has been no replanting. The plan must include a schedule of replanting of Marram Grass to stabilise the dunes. According to the Council's plan,

> *OCP 3, p 123 Monitor existing dune management schemes on an ongoing basis and carry out appropriate repairs, improvements and extensions subject to availability of resources and compliance with Habitat Directive. Where appropriate continue to employ soft engineering techniques, ie. Dune stabilisation and planting.*
> *OCP - Identify, prioritise and implement Coastal protection works within the coastal zone where considered necessary subject to the availability of resources and compliance to habitat directive.*

Effective monitoring is not happening.

Sewage

Residential Property Development

The residential development of 34 new homes on Top Road contravenes the Councils directive that no new dwellings will be permitted until the new sewage treatment plant is operational. There are housing developments that were approved before the down turn in the economy. Though planning permission was approved, it has now become apparent that the Sewage Treatment Facility cannot cope with any additional waste treatment. I have read that works to improve this facility are to begin in the new year, however, given the delays and the nationwide problems with upgrading sewage treatment plants and the fact that the plant has already exceeded capacity and the noxious odour from the sewage treatment plant can be smelled from as far away as the Burma road, it is in contravention of the County Council's own directive not to approve any further residential developments until the sewage treatment facility is fully operational. I note there is planning permission for a further development in Carrowbunnaun to be decided in January 2017.

Infrastructure

There is also the issue of Infrastructure, specifically the proposed new road linking Airport Road, R277 with R292, this plan was rejected based on an environmental impact in the former plan 2013-2017. This cannot be put back on the agenda without a full external environmental impact review. I do not believe the underlying environmental concerns have changed, thus, it cannot be reinstated without consultation with the previous professionals who vetoed this.

I would like to take this opportunity to thank you as representatives of the community for all your hard work as County Councillors and look forward to your feedback on the above suggestions.

Yours sincerely,

Ann McKiray

https://ssl.gstatic.com/ui/v1/icons/mail/images/cleardot.gif

Sinead Maguire <sineadmaguire@yahoo.com>
To: Ann McKirdy <annmckirdy@gmail.com>

Thu, Dec 1, 2016 at 11:20 AM

Hi Anne

Thank you for your email and kind remarks.

I would welcome an opportunity to meet with you to discuss the issues raised and wonder if there is a time convenient for you?

Kind regards

Sinéad Maguire

Sent from my iPhone
[Quoted text hidden]

Ann McKirdy <annmckirdy@gmail.com>
To: Sinead Maguire <sineadmaguire@yahoo.com>
Thu, Dec 1, 2016 at 12:36 PM

Good morning Sinead,
Thank you for getting back to me. I can meet you tomorrow morning 9.45-10 am if that suits?
Otherwise next week.
Please let me know if that suits.
Thank you,
Ann
[Quoted text hidden]

Sinead Maguire <sineadmaguire@yahoo.com>
To: Ann McKirdy <annmckirdy@gmail.com>
Thu, Dec 1, 2016 at 2:04 PM

Hi Anne

That's perfect, where would you like to meet?

Sinéad

Sent from my iPhone
[Quoted text hidden]

Ann McKirdy <annmckirdy@gmail.com>
To: Sinead Maguire <sineadmaguire@yahoo.com>
Thu, Dec 1, 2016 at 2:42 PM

Hi Sinead,
How does Shells Cafe sound? I'm not sure if it will be too busy, acoustics can be a challenge there when it's busy.
I'm flexible, I can meet in town if that suits you better.
Thanks
Ann
[Quoted text hidden]

Sinead Maguire <sineadmaguire@yahoo.com>
To: Ann McKirdy <annmckirdy@gmail.com>
Thu, Dec 1, 2016 at 4:03 PM

No that's great Ann let's go with that.

Sent from my iPhone
[Quoted text hidden]

Ann McKirdy <annmckirdy@gmail.com>
To: Aine Nic Amhlaidh <Ainenicamhlaidh@gmail.com>
Tue, Jul 6, 2021 at 7:39 AM

Draft amendment 2017-2023
[Quoted text hidden]

Ann McKirdy <annmckirdy@gmail.com>
Tue, Jul 6, 2021 at 7:41 AM

To: Aine Nic Amhlaidh <Ainenicamhlaidh@gmail.com>

objection 2017-2023

---------- Forwarded message ---------
Fro **Ann McKirdy** <annmckirdy@gmail.com>
Date: Wed, Nov 30, 2016 at 1:27 PM
Subject: mariecasserly1@gmail.com ,dbree@eircom.net, paultaylorsligo@gmail.com, keithhenrysligo@gmail.com
To: <hubertkeaney@hotmail.com>, **Rosaleen O Grady** <ogradyrosaleen@eircom.net>, **Gino O Boyle** <ginopbp@outlook.com>, **Tom MacSharry** <tommacsharry@hotmail.com>, **Sinead Maguire** <sineadmaguire@yahoo.com>, **Sean Mcmanus** <seanmacmanus@eircom.net>, <skilgannonsligo@gmail.com>, <thealyt@gmail.com>, <queenanjoseph@eircom.net>, <dfmulvey@gmail.com>, <cllrjerrylundy@eircom.net>, <gormleymargaret@eircom.net>, <cllrmbaker@gmail.com>, **Michael Clarke** <cllrmichaelclarke@eircom.net>

[Quoted text hidden]

Ann McKirdy <annmckirdy@gmail.com> Sat, Jan 8, 2022 at 2:02 PM
To: Aine Nic Amhlaidh <Ainenicamhlaidh@gmail.com>

---------- Forwarded message ---------
From: **Ann McKirdy** <annmckirdy@gmail.com>
Date: Wed, Nov 30, 2016 at 1:27 PM
Subject: mariecasserly1@gmail.com ,dbree@eircom.net, paultaylorsligo@gmail.com, keithhenrysligo@gmail.com
To: <hubertkeaney@hotmail.com>, **Rosaleen O Grady** <ogradyrosaleen@eircom.net>, **Gino O Boyle** <ginopbp@outlook.com>, **Tom MacSharry** <tommacsharry@hotmail.com>, **Sinead Maguire** <sineadmaguire@yahoo.com>, **Sean Mcmanus** <seanmacmanus@eircom.net>, <skilgannonsligo@gmail.com>, <thealyt@gmail.com>, <queenanjoseph@eircom.net>, <dfmulvey@gmail.com>, <cllrjerrylundy@eircom.net>, <gormleymargaret@eircom.net>, <cllrmbaker@gmail.com>, **Michael Clarke** <cllrmichaelclarke@eircom.net>

[Quoted text hidden]

Dune Removal
ENF 3060

Gmail

Ann McKirdy <ainenicamhlaidh@gmail.com>

FW: ENF 3060- Removal of Dunes in Carrowbunnaun and clearing sensitive land

Enforcement <enforcement@sligococo.ie>
To: Ann McKirdy <ainenicamhlaidh@gmail.com>

Tue, Apr 8, 2025 at 6:29 PM

If your email relates to a complaint regarding an unauthorised development, we advise you to submit your complaint online as per the following link which will enable the Enforcement Section to deal with the complaint more efficiently.

https://www.sligococo.ie/planning/Enforcement/EnforcementofPlanningControl/MakingaComplaint/

The matter will be investigated, and a response will issue in due course.

****

Má bhaineann do ríomhphost le gearán maidir le forbairt neamhúdaraithe, molaimid duit do ghearán a chur isteach ar líne de réir an naisc seo a leanas, a chuirfidh ar chumas na Rannóige Forfheidhmithe déileáil leis an ngearán, ar bhealach níos éifeachtaí.

https://www.sligococo.ie/planning/Enforcement/EnforcementofPlanningControl/MakingaComplaint/

Déanfar an cheist a fhiosrú, agus eiseofar freagra in am tráth.

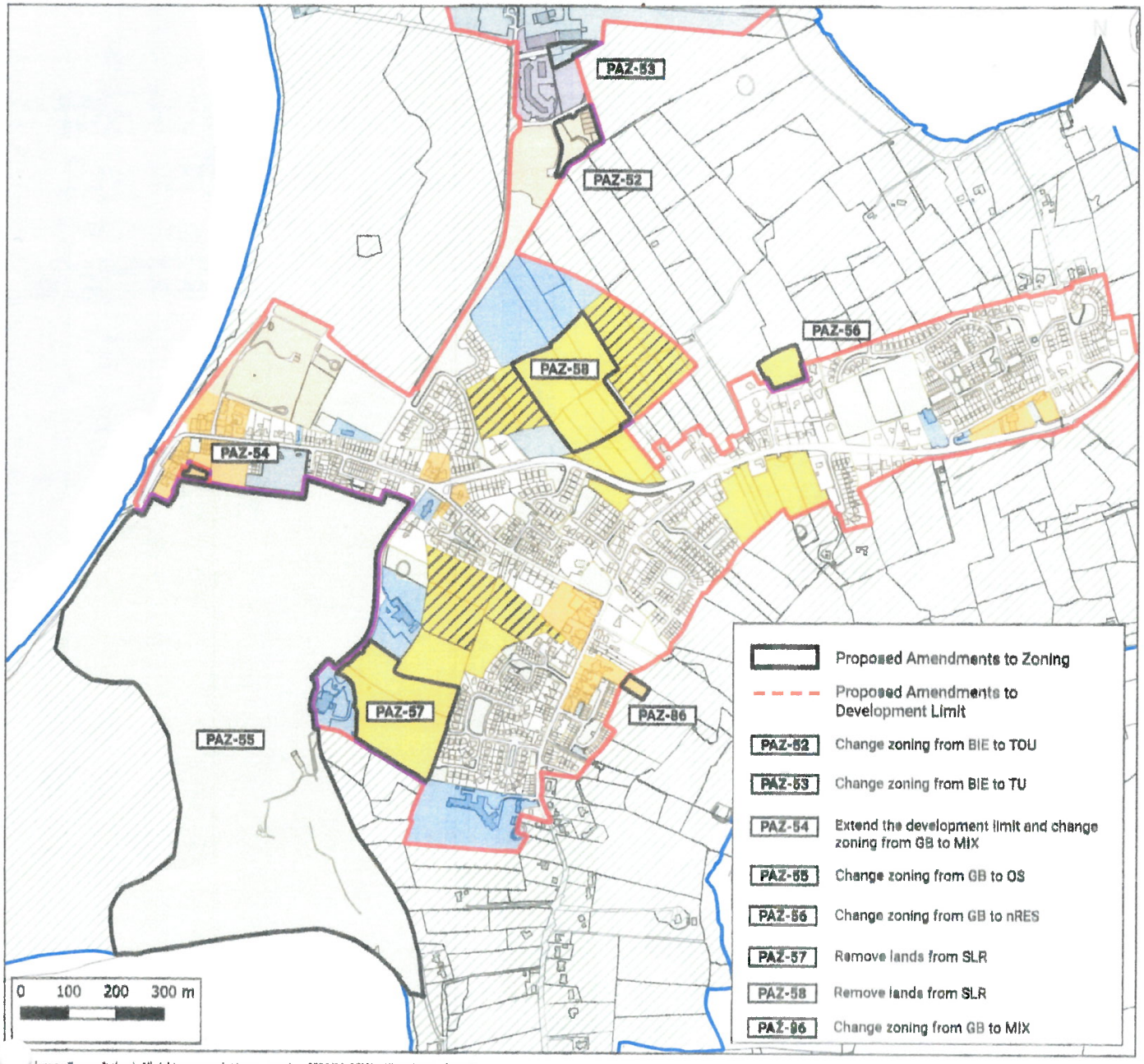
From: Ann McKirdy <ainenicamhlaidh@gmail.com>
Sent: Tuesday, April 8, 2025 5:28:33 PM
To: Enforcement <enforcement@sligococo.ie>
Subject: Re: FW: ENF 3060- Removal of Dunes in Carrowbunnaun and clearing sensitive land

[Quoted text hidden]

Planning Application Approved

Dune Removal
Strandhill
Application was
Approved
Feb 26
I appealed to ABP

Current Zoning



Strandhill

Proposed Amendments to Zoning

- Plan Limit
- Development Limit
- MIX - mixed uses
- eRES - existing residential areas
- nRES - new residential uses
- CF - community facilities
- BIE - business, industry, enterprise
- OS - open space and recreational amenities
- TU - transport and utilities infrastructure
- TOU - tourism
- SLR - Strategic Land Reserve
- GB - Green Belt

07.06.2024

rdnance Survey Ireland. All rights reserved. Licence number 2020/30 CCMA/ Sligo County Council

Controversial Rezoning

Sligo County Council
Comhairle Chontae Shligigh

Unique Reference Number: SLG-C61-76
Status: Submitted
Submission:
Strandhill public realm oppose Part 8 proposal

Author: Ain

Consultation:
Strandhill Public Realm Enhancement

Date Created: 11.04.2025 - 06:20
Date Submitted: 11.04.2025 - 06:56

Observations:

Object to Part 8 Proposal

Chapter: Public Notice

• I am writing to you with regards to this proposed PART 8 Development in Stranhdill. I believe this development necessitates An Environmental Impact Assessment given that it is within 100 m of the High Tide mark which requires that it is notified to the Department of the Marine.

• It is within 100 m of the SAC

• It is within 100 m of a National Heritage Monument – The Shelly Valley

• Recent Archaeological Assessment near the St. Patrick's National school in proximity to this development revealed a midden, which is an important archaeological find showing early settlement in this area.

• This site – Marram Grass Dunes - for the car park and the proximity to the Shelley Valley Middens, requires a full environmental and archaeological assessment

• This entire area has special orchid species and is also potentially protected habitat for whorl snail.

• This area is highly sensitive to coastal erosion.

• Strandhill has been inundated with visitors and tourists since the opening of the Lub Naisiunta Trails which cross the special areas of conservation including sensitive h tats and saltmarshes. The volume of tourist is close to half of one million. This is completely unprecedented and unsustainable.

• This also is an issue for the Waste Water Treatment as the plant is newly built however severe noxious odors and has been using unlicensed waste treatment provider to clear the excess waste two times weekly since it opened in 2021.

The Vulnerable in our community

this proposal ignores the needs of the most vulnerable in our community, the young, the elderly and disabled.

children are at risk of hypothermia given their physiology, this is highly documented and scientifically very well researched. Children's risk of hypothermia is significantly greater than that of adults given their body composition. They need to be able to get to their parents car quickly.

Adult monitoring children surfing - given our inclement wet weather and the fact that it is cold, windy and rainy most days, for families with more than only child, it is impossible to monitor the surfing children and the non surfing children without shore front access to see the sea.

National Foreshore Policy:

it is the law that access to the foreshore cannot be denied to the community. This proposal denies access . It is dishonest and disrespectful to claim that blue sticker parking will suffice. Anyone with an elderly family member can attest to the fact that the criteria for eligible for this permit is so restrictive. Furthermore, the waiting period etc excludes those temporarily disabled.
this is shameful discrimination.

Sligo County Development Plan: Strandhill is not currently listed as having a special tourism function. The removal of this designation has facilitated the council increasing the housing d sity for residential purposes. The wastewater treatment plant and the environment cannot cope with the influx of tourists.

It would appear that Sligo Co Co has a mandate to turn Strandhilll into a Tourism Industry without regard for the infrastructure or the needs of the local community, children, families, the elderly, the disabled, those who are most vulnerable.

misleading Waste Water Capacity

The current interim Development plan proposes that there is headroom capacity for the increase by 2500 PE (People Equivalent in residential terms) however, where is the waste disposal for all of the visitors calculated ?

Surely recreational waters for the surfing community must be considered for health and safety reasons? Strandhill is the location of the only National Surf Centre in the country, it is located within 300m of the waste water treatment plant. How safe is it for surfers to be in those waters? The level of Ammonia being disposed to sea has exceeded the National limit since the opening of this plant, furthermore these waters are classified as 'shellfish waters' given the fact that they support the hugely successful Oyster Shell Fish Farm also within 500 m of the water water treatment plant.

Strandhill is first and foremost a residential community. The residents have voiced their concern. Our concerns are being ignored.

European Mandate : Sligo Co Co is required under EU Habitat Protection and Birds Directive to fully environmentally assess all Development Proposals, this in hides assessing for development impact on protected species and assessing the impact on humans. The shocking devastation of the. salmon population, decimated last summer in Ballisodare bay is an indicator that the sewage and waste being disposed is a risk to human life.

Antisocial behaviour and public Safety: it is unsafe to have public areas cut off from a flow of traffic, this has been a universal concern and has been very well researched and documented is cornerstone of public realm development. This proposal will invite antisocial behaviour. There is no Garda presence in Strandhill, it has been self regulating and managed with the local community.

I trust that you will agree with the above and refuse this proposal.

Main opinion:

Strongly object to Public Realm proposal

Main requests:

Refuse this proposal

Main reasons:

Vulnerable in our community, health and safety and environmental concerns

---

Documents Attached: No
Boundaries Captured on Map: No

FOI 126/21 Visitors Killarpugbarone

FOI 126/21 Report

Reference FOi 127/21 see extract email below

Dear Sharon , Siobhan and FOI officer,

1. Please issue an FOI for the statistics of all People counters on a per month basis since date of installation in Strandhill, Coolera Peninsula and Knocknarea mountain walk access points.

2. I would also like the minutes of the County Council meeting to approve these counters- and who proposed them.

3. I request the purpose of gathering these statistics.

4 I request the funding source for these units, cost per each and funding source per each.

Sincerely,

Ann McKirdy

Report: response provided based on above;

1. Data records, as follows.

Units of monthly figures are for each time the sensor or detection beam of the counter was broken only.

Monthly figures:

Queen Maeve Trail

April 2843

May 2911

June 3696

July 4059

A 138

Sept 2500

Oct 1388

Knocknarea Trail

April 2238

May 2442

June 3967

July 4343

Aug 5594

Sept 2086

Oct 1133

Airport

April 5195

May 4666

June 4533

July 6312

Aug 4700

Sept 2465

Oct 1344

Strandhill Carrowbunnaun

April 7807

May 8449

June 11909

July 14411

Aug 16272

Sept 8813

Oct 4272

2. No records.
3. To seek to establish user numbers.
4. Sligo County Council: €2585.25/counter

Trail Gazers Meeting takes place at Sligo Airport

Posted on November 3, 2021

As part of the Trail Gazers Project which looks to develop walking trails sustainably, a group of stakeholders, business owners and members of community groups met at Sligo Airport in Strandhill yesterday, Tuesday November 2nd. The aim was to inform those in attendance of plans to develop and protect the walks and to invite input from the public.

The meeting began with a description by the Trail Gazers team of current and recent works on the Queen Maeve Trail on Knocknarea and on the coastal walk at Killaspugbrone. Those in attendance were invited to provide feedback to this presentation, and to put forward ideas and proposals for the development of these walks in a sustainable and manageable way.



Steering Group at Trail Gazers meeting at Strandhill Airport – photo SligoWalks.ie

As we have seen in recent times, with people staycationing in Ireland due to the pandemic and also because of climate change concerns, there has been a significant increase in walking numbers on these trails. Digital counters have been installed at four locations along the routes and these statistics, presented to the meeting by Sorcha Sheehy of Sligo County Council, identify trends relating to the

busiest periods for walking at the locations, and which access points are the most utilised.



Michael Carty of Trail Gazers

It was found that while both walks are very popular with locals and visitors alike, there are challenges ahead in particular in relation to the Killaspugbrone walk. The walk is located in a Special Area of Conservation, and the terrain has also been subject to coastal erosion. In addition, most walkers access the walk at the access point beside the cannon in Strandhill, which suggests that other access paths to the walk could be created to accommodate walkers and to ease congestion during the Summer.

Several other other suggestions and recommendations were put forward by those in attendance, and Michael Carty of Sligo County Council thanked the public for their input.

"We need to manage these walks, develop them in a way that will encourage people to walk to improve physical and mental health. But we also need to do so in a sustainable way which respects the landscape, creates awareness of our heritage and maintains environmental awareness. We also want to include the community in forward planning, and this includes businesses who want to better engage with the increasing numbers of people who walk on Knocknarea or at Killaspugbrone, but we all need to cooperate in a constructive and balanced way. I thank all of those who attended today and provided insight during the discussions."

The Trailgazers workshop was led by Michael Carty and Sorcha Sheehy of Sligo County Council, by Micheál Ó Domhnaill of Omedia and facilitated by the staff of Sligo Airport.



Trail Gazers organizing team Michael Carty, Sorcha Sheehy and Micheál Ó Domhnaill – photo SligoWalks.ie

Trail Gazers is an initiative which involves 10 different European partners and which aims to revitalise, regenerate and re-imagine rural communities by developing a 'shared vision' for the future sustainable development of the trail site, its natural and cultural assets and surrounding towns, villages and countryside. For more visit www.trailgazers.eu.

Photos Killaspugbrone
Lub Naisiunta

https://www.facebook.com/search/top/?q=neil%20byrne

Photos posted by Neil Byrne from Mammy Johnston's Icecream Parlour in Strandhill today on facebook (10/1/2021)

These were the Dunes a few years ago, looking from Strandhill towards Killaspugbrone – My guess is these photos were taken approximately two years after the opening of the trail in April 2016 as fencing was only installed following numerous petitions and photos by email I submitted to Sligo Co. Co. I understand others too were seeking protection for the dunes following the evidence of significant coastal erosion.





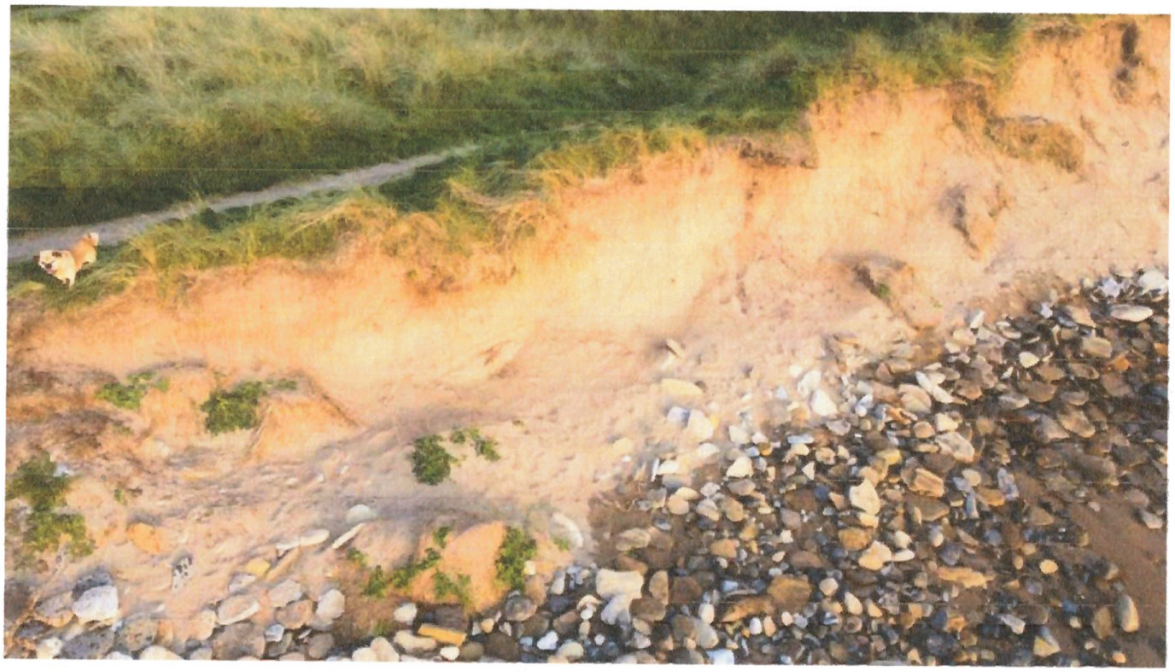
Today – Photo above – What the same area looks like January, 10th 2022. Please also note the intrusion of the two large electricity posts, this is the site of the new Waste Water Treatment plant for which the Sligo Co. Co received millions of Euro's to upgrade, NO EIA or AA or Part VIII was done.

Apparently, the EU legislation does not apply to Sligo and environs.









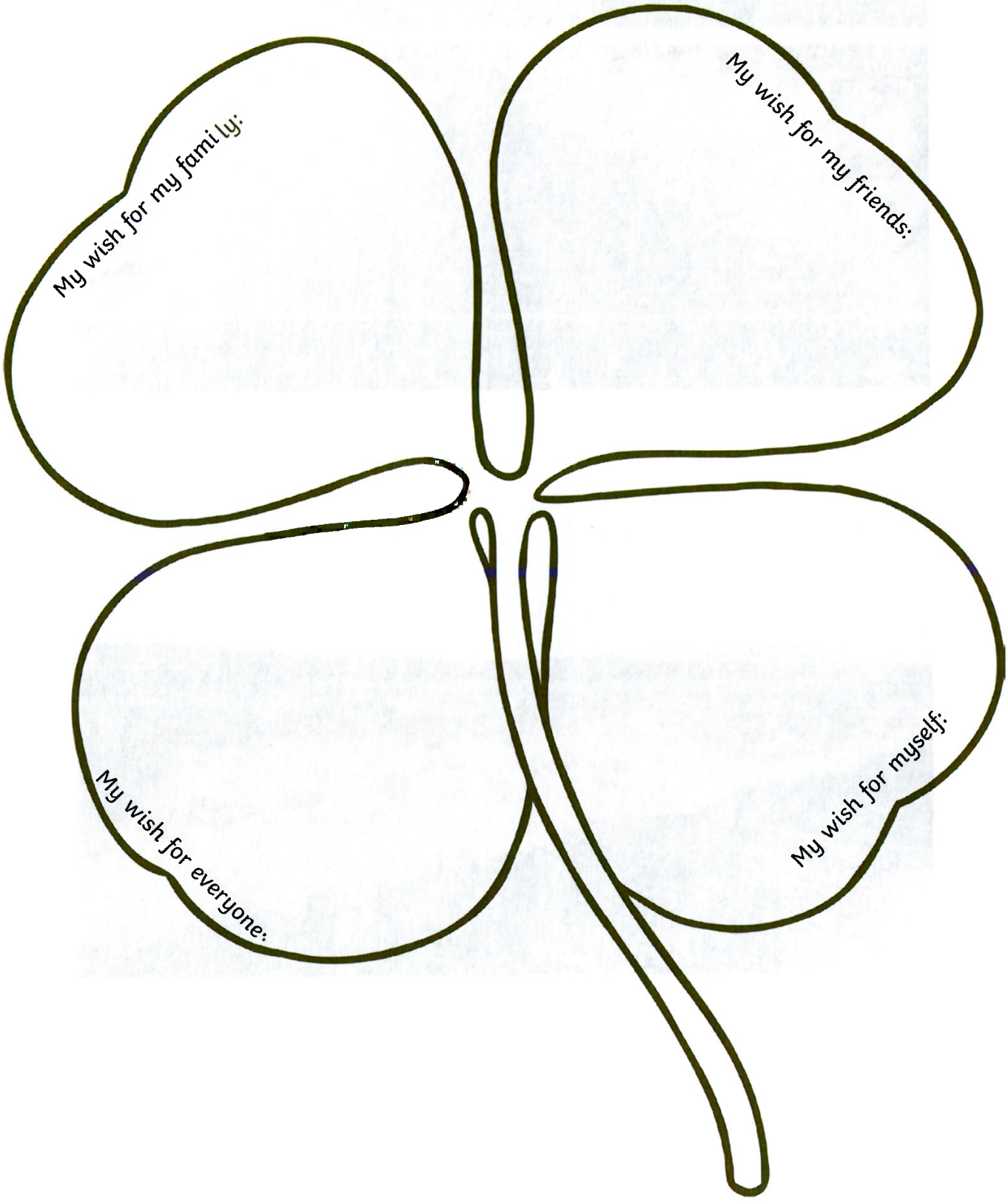








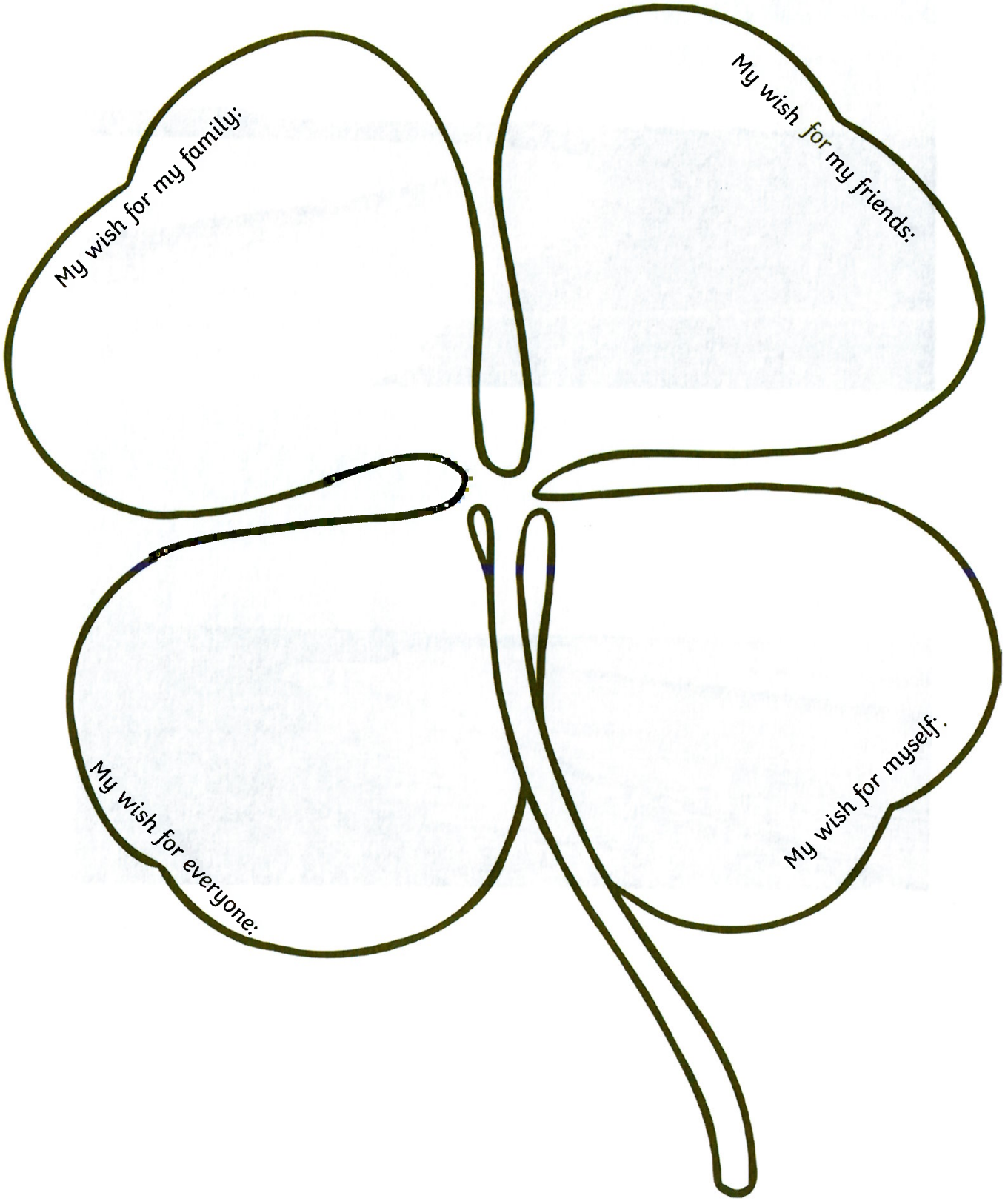
Wishing on a Lucky Clover







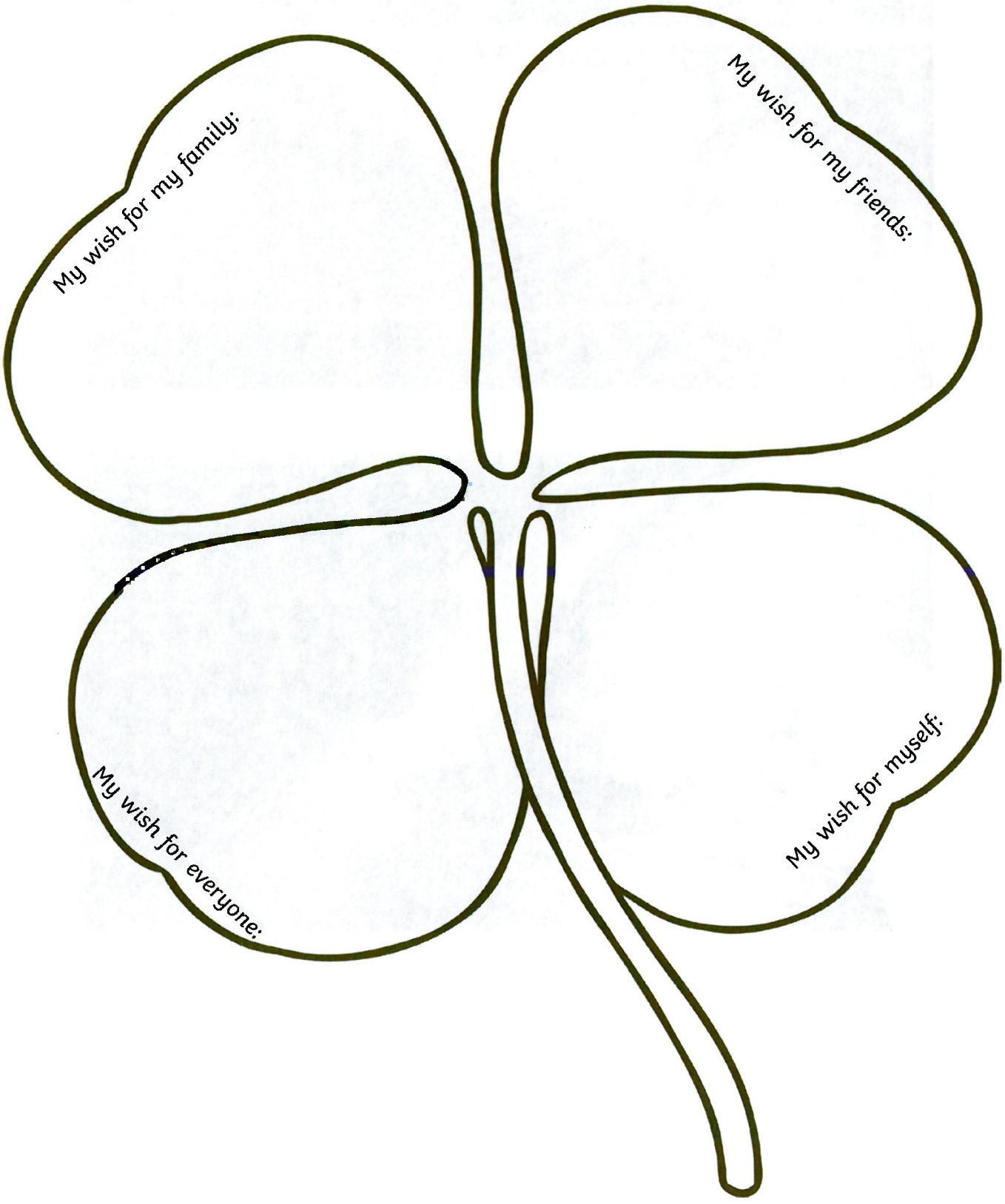
Wishing on a Lucky Clover





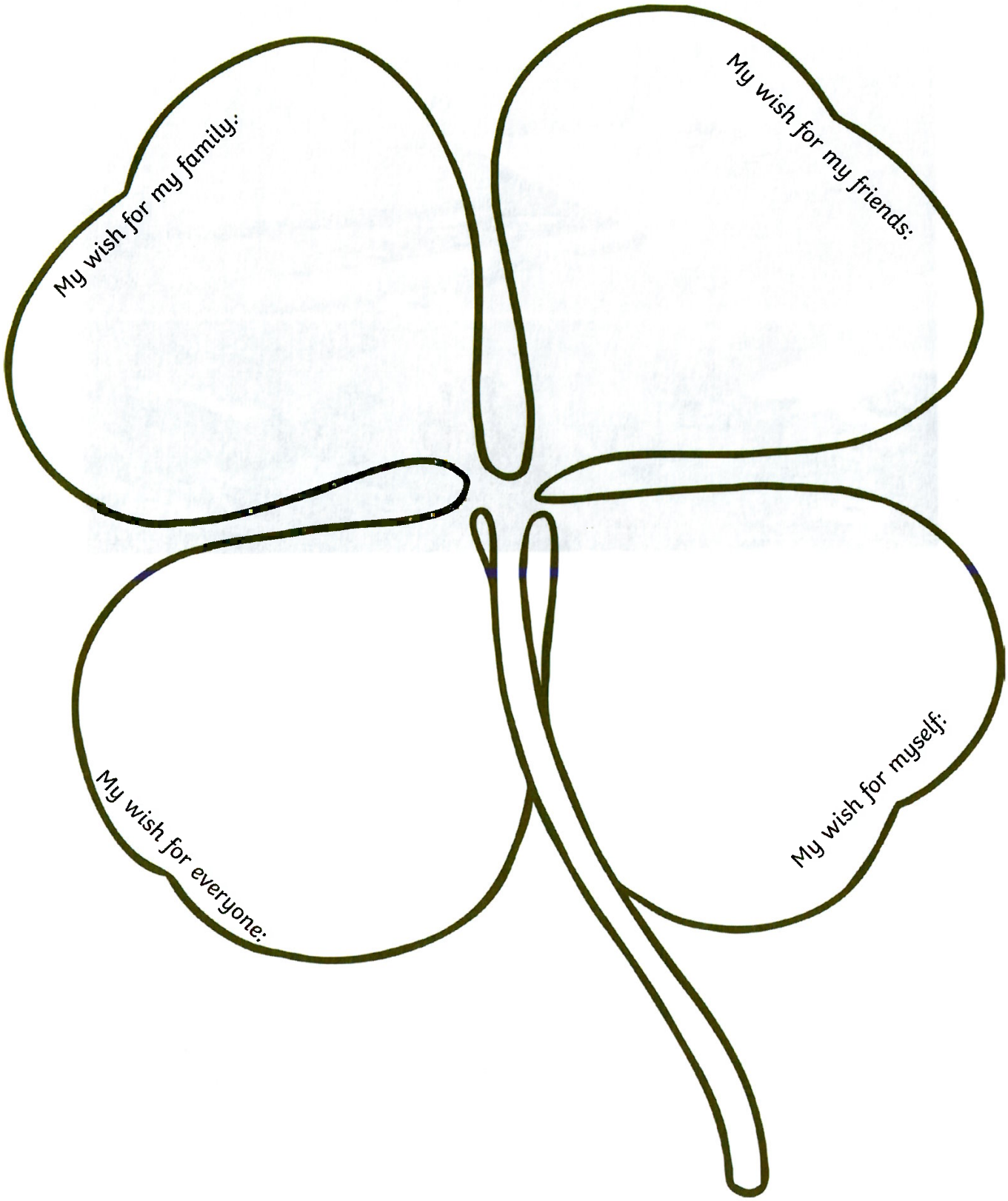


Wishing on a Lucky Clover





Wishing on a Lucky Clover





https://www.facebook.com/search/top/?q=neil%20byrne – posted today 10/1/2022 FACEBOOK

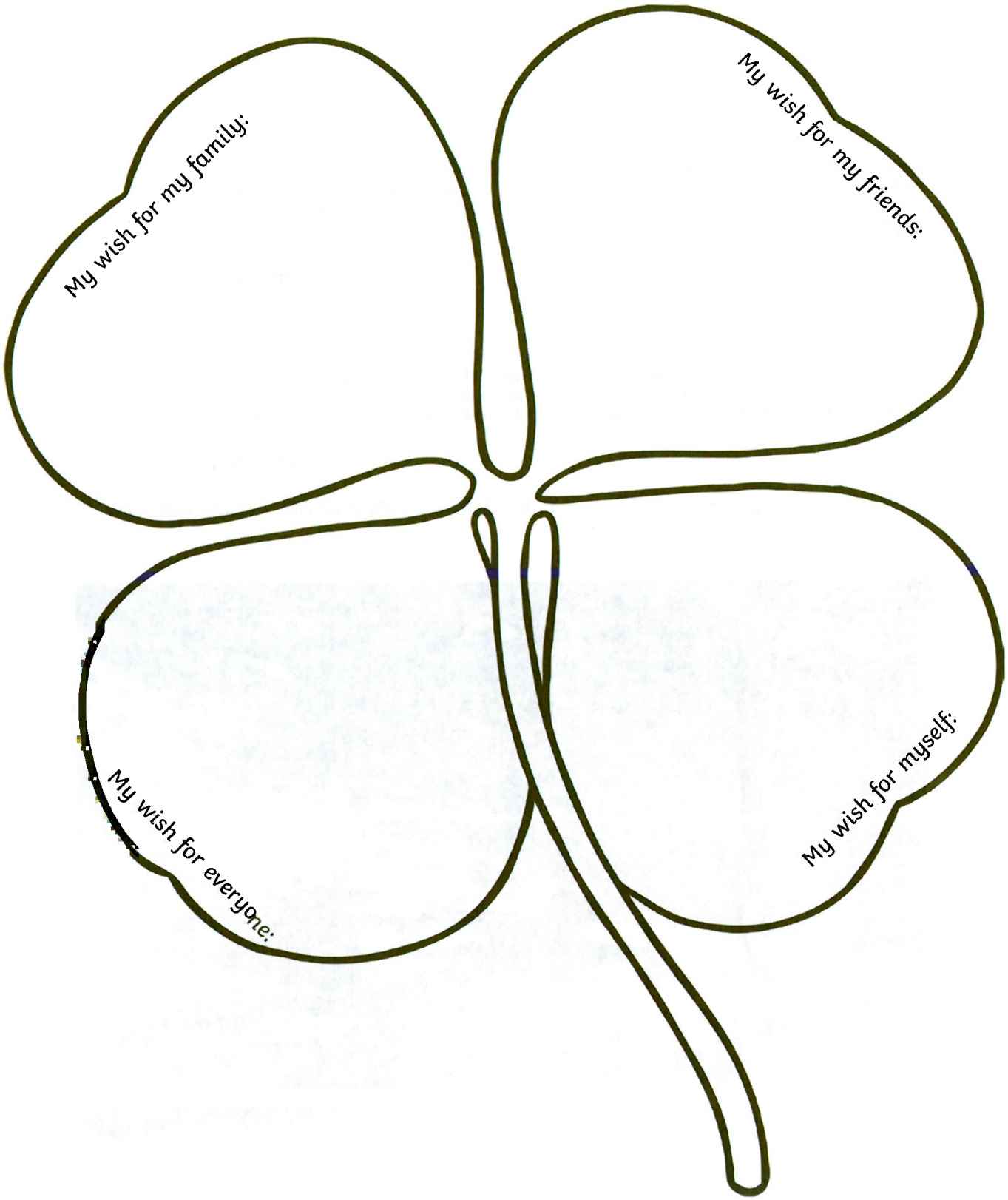
○ **Neil Carew**

When are the council going to realise that Rock Armour is the only answer to this erosion. It's a proven fact around the world!!! Yet reports upon reports and surveys will be done costing a fortune and in the end they will put in the rocks but only whe…

Tom Macsharry

As you know Neil, I put in a motion calling for Rock Armour at your request and others a few years back!! I was told last year to wait for a survey and I said that if urgent action was not taken then or immediately there will not be a coast line to survey??? I think there was a great job done at Rosses Point with rock armour! Which hopefully will protect and save that stretch of coastline! ☝

Wishing on a Lucky Clover



TM "tom macsharr... 15/01/2021

Motion for the Febraury Ordinary meeting

"That Sligo County Council assess the damage done to the fencing and walkways at the Dunnes on Strandhill beach as a result of Coastal erosion"

Neil Byrne

Tom Macsharry yes Tom you are correct the problem is getting everybody to agree

Tom Macsharry can you please research rock armour. This is not going to solve the problem. It just pushes the problem further along. Really outdated method at this stage.

Neil Carew

Tom Macsharry Hi Tom, can I ask what is the up to date position on these surveys and what the timescale is? Time is rapidly running out here. Action needs to be taken immediately

Jonathan Mark Carter

Neil Byrne Caravan park must be endangered at this stage. Council did a huge job in Rosses Point last year with rocks. Why are we being ignored in Strandhill?

Gary Devins

Jonathan the council didn't do it, the golf club members raised over €700,000 themselves and employed contractors to do it. The council only did structural safety works to the walkway

Neil Byrne

Gary Devins The golf course in Rosses point is private land, The land that we are talking about in Strandhill is public land belonging to Sligo county council

Jonathan Mark Carter

Gary Devins . The Golf Club paid one contractor to install rocks on their sea frontage. Another 40/50 metres was done on behalf of the council by a different contractor.

Jonathan Mark Carter

In the short term something really does need to be done.

Neil Byrne

Well said , we are losing about 2 m a year off the Sand dunes

Corinne Rushe

The problem is when rock armour is put in place you have people giving out about how its affecting the beauty of the landscape and how its unsightly etc! It's badly needed or there will be nothing to look at!

Neil Byrne

Corinne Rushe you've hit the nail on the head

An Na

Corinne Rushe unfortunately rock armour can make erosion worse further down the coastline. It diverts the wave energy down the shoreline and increases erosion in those areas. This process is clearly visible in strandhill either side of existing rock ar...

Ingrid Lally

I wonder is the rock available locally? Would the quarry nearby be suitable? Costs could be kept minimal if everything kept local and council supply labour and machines, which they may already have in the depot.

Noel Joseph

Soon there won't be a caravan park!

Stan O'Grady



Stan O'Grady



Tom Macsharry

Whorl Snail Monitoring 2025 1/2

Citation: Brophy, J.T., Daly, O.H., Hamilton, J.J., O'Neill, F.H. & Martin, J.R. (2025). Monitoring of three Annex II species of *Vertigo* snail on Irish sites (2022-2024). Irish Wildlife Manuals, No. 159. National Parks and Wildlife Service, Department of Housing, Local Government and Heritage, Ireland.

Keywords: *Vertigo angustior*, *Vertigo geyeri*, *Vertigo moulinsiana*, Mollusca, molluscs, Ireland, Article 17, wetlands, monitoring, site assessment, distribution

National Parks and Wildlife Service (NPWS) commissions a range of reports from external contractors to provide scientific evidence and advice to assist it in its duties. The Irish Wildlife Manuals series serves as a record of work carried out or commissioned by NPWS, and is one means by which it disseminates scientific information. Others include scientific publications in peer reviewed journals. The views and recommendations presented in this report are not necessarily those of NPWS and should, therefore, not be attributed to NPWS.

Front cover, from left to right and top to bottom:

A deep water fly trap anemone *Phellactis* sp., Yvonne Leahy; **Common Newt** *Lissotriton vulgaris*, Brian Nelson; **Limestone pavement**, Bricklieve Mountains, Co. Sligo, Andy Bleasdale; **Garden Tiger** *Arctia caja*, Brian Nelson; **Violet Crystalwort** *Riccia huebeneriana*, Robert Thompson; **Coastal heath**, Howth Head, Co. Dublin, Maurice Eakin; **Meadow Saffron** *Colchicum autumnale*, Lorcan Scott

Bottom photograph: **Desmoulin's Whorl Snail** *Vertigo moulinsiana*, Charleville Lake, Co. Offaly, John Brophy

Vertigo Angustior

Monitoring of three Annex II species of *Vertigo* snail on Irish sites (2022-2024)

John T. Brophy, Orla H. Daly, Jessica J. Hamilton, Fionnuala H. O'Neill & James R. Martin

Botanical, Environmental & Conservation Consultants Ltd., 65 Holywell, Dundrum, Dublin 14

The NPWS Project Officer for this report was: Dr. Brian Nelson; brian.nelson@npws.gov.ie

This IWM was edited by: Dr. Chris Peppiatt, Sue Wilson & Domhnall Finch

ISSN 1393 – 6670

© An tSeirbhís Páirceanna Náisiúnta agus Fiadhúlra 2025

National Parks and Wildlife Service 2025

An Roinn Tithíochta, Rialtais Áitiúil agus Oidhreachta, 90 Sráid an Rí Thuaidh, Baile Átha Cliath 7, D07 N7CV

Department of Housing, Local Government and Heritage, 90 North King Street, Dublin 7, D07 N7CV

Pg 19 - highlights impact of WWTPs

Killaspugbrone Trail Anthropogenic impact

Mr. and Mrs. Thomas Monaghan

request the pleasure of your company

at the Inauguration of

Ave Maria College

on the Feast of the Immaculate Conception

Eight o'clock in the morning

Contents

Executive Summary i
Acknowledgements ii
1 Introduction 1
2 Methodology 1
2.1 Site selection 1
2.2 Survey methodology 5
3 Results 6
3.1 Overview of results 6
3.2 Vertigo angustior results 6
3.2.1 *Vertigo angustior* overview 6
3.2.2 *Vertigo angustior* population 7
3.2.3 *Vertigo angustior* habitat 9
3.2.4 *Vertigo angustior* pressures and threats 13
3.2.5 *Vertigo angustior* site conservation assessments 17
3.3 Vertigo geyeri results 20
3.3.1 *Vertigo geyeri* overview 20
3.3.2 *Vertigo geyeri* population 20
3.3.3 *Vertigo geyeri* habitat 23
3.3.4 *Vertigo geyeri* pressures and threats 27
3.3.5 *Vertigo geyeri* site conservation assessments 30
3.4 Vertigo moulinsiana results 32
3.4.1 *Vertigo moulinsiana* overview 32
3.4.2 *Vertigo moulinsiana* population 32
3.4.3 *Vertigo moulinsiana* habitat 34
3.4.4 *Vertigo moulinsiana* pressures and threats 38
3.4.5 *Vertigo moulinsiana* site conservation assessments 43
4 Discussion 46
4.1 Vertigo angustior 46
4.2 Vertigo geyeri 48
4.3 Vertigo moulinsiana 50
5 Conclusion 52
6 Bibliography & Relevant Literature 53

Executive Summary

All three *Vertigo* species listed in Annex II of the EU Habitats Directive (92/43/EEC) and present in Ireland were surveyed over a three-year period (2022-2024). These surveys were carried out in order to gather the information needed to prepare National Conservation Assessments for the three species for submission to the European Commission, as required every six years. The three species are the Narrow-mouthed Whorl Snail (*Vertigo angustior*), Geyer's Whorl Snail (*Vertigo geyeri*) and Desmoulin's Whorl Snail (*Vertigo moulinsiana*). The 2022-2024 surveys fell within the 2019-2024 Article 17 monitoring period. This is the third round of monitoring that has been carried out for these species, with the previously completed monitoring having been for the periods 2007-2012 and 2013-2018.

During this most recent monitoring period, 60 monitoring sites within the Republic of Ireland were surveyed for the target species. These comprised 20 sites for *V. angustior*, 19 for *V. geyeri* and 21 for *V. moulinsiana*. With the exception of three new *V. moulinsiana* sites, all the survey sites had been surveyed during at least one of the previous monitoring periods.

The survey revealed that the number of sites positive for *V. angustior* has declined by six since the previous round of monitoring, while *V. geyeri* was recorded from seven fewer sites and *V. moulinsiana* was recorded from one additional site (excluding the three new sites).

Of the 20 *V. angustior* sites visited, the overall conservation assessment status has declined at seven since the previous round of monitoring. For *V. geyeri*, a decline was noted for six sites and an improvement noted for one. In the case of *V. moulinsiana*, there was a decline at four sites and an improvement at one.

A range of pressures were recorded at the sites that are considered to be affecting their conservation status. The treatment of threats and pressures in this site-based report is more detailed than that in the Article 17 National Conservation Assessments for the three whorl snail species, which concentrate, by necessity, on the overall national situation for each species and deal with the threats and pressures that are significant at a national level. The main pressures include grazing intensity, hydrological changes resulting in drying out or fluctuating water levels (possibly due to climate change, or to other local factors) and drainage. While grazing can have positive effects depending on the species (*V. geyeri* in particularly benefits from a moderate level of grazing, particularly by sheep), drying out of habitat has negative effects for all three species.

While positive pressures were noted for several sites, these were generally incidental benefits from existing land-uses (*e.g.* agricultural grazing). Occasional conservation measures directed at improving the habitat at *Vertigo* sites were aimed at the general habitat rather than specific measures for the relevant *Vertigo* species. Such measures included the installation of chestnut fencing at sand dune sites, farm plans managing grazing levels, native invasive species control and conservation grazing. A notable example of conservation measures achieving positive effects for a *Vertigo* site is VgCAM08 Sheskinmore, which has seen improvements to the site for *V. geyeri* leading to its overall conservation status becoming Favourable (green) from Unfavourable-Inadequate (amber) after the 2013-2018 round of monitoring. At this site, conservation grazing has been undertaken and the water levels of Sheskinmore Lough controlled using a sluice at the outflow.

The continued decline in overall conservation status of the *Vertigo* species' sites is of considerable concern and active intervention will be required to address the decline and return the species to Favourable Conservation Status. While measures to reverse climate change are beyond the scope of any actions that can be initiated at a site level, the resilience of the sites may still be improved by other measures, such as applying an appropriate level of grazing or blocking drains. While the European Union Nature Restoration Law focuses on habitats, the required management and restoration of habitats including fixed dunes, alkaline fens and reed

and tall herb swamps in Ireland will have to take the needs of the three Annex II *Vertigo* species into account.

Acknowledgements

The authors would like to thank all the people who made the completion of this project possible, including NPWS District Conservation Officers and Conservation Rangers for proving information on the various survey sites and accompanying us on fieldwork; the landowners for providing access to the sites, Maria Long for information on several new *V. moulinsiana* sites; Adam Mantell, Anne Mullen, Chris O'Neill and Lorcán Scott for detailed information on the *V. angustior* site at Derrynane; Paolo Viscardi, Amy Geraghty and Aidan O'Hanlon for the information on DNA sample preservation; and finally, the NPWS project manager, Brian Nelson for support throughout the project.

1 Introduction

Of the four species of *Vertigo* listed in Annex II of the EU Habitats Directive (92/43/EEC), three are found in Ireland. These are the Narrow-mouthed Whorl Snail (*Vertigo angustior* Jeffreys, 1830), Geyer's Whorl Snail (*V. geyeri* Lindholm, 1925) and Desmoulin's Whorl Snail (*V. moulinsiana* (Dupuy, 1849)). Due to their presence in Annex II, Ireland is required to designate Special Areas of Conservation (SACs) for the conservation of these species. To date, 13 SACs have been designated for *V. angustior*, 13 for *V. geyeri* and eight for *V. moulinsiana*, with some SACs supporting two or more of the species. Furthermore, under Article 17 of the Habitats Directive, every six years Ireland is required to report on the implementation of the Directive, including the results of surveillance monitoring carried out for the relevant habitats and species.

Since the Habitats Directive came into force, Ireland has produced three Article 17 reports covering the periods, pre-2007 (NPWS, 2008), 2007-2012 (NPWS, 2013) and 2013-2018 (NPWS, 2019). Across these three reporting periods, the overall conservation status of *V. angustior* has been Unfavourable-Inadequate (with the trend qualifier of 'deteriorating' added for 2013 and 2019) (NPWS, 2008; 2013; 2019). For *V. geyeri*, the overall conservation status has dropped from Unfavourable-Inadequate in 2007 and 2013, to Unfavourable-Bad (deteriorating) in 2019 (NPWS, 2008; 2013; 2019). *Vertigo moulinsiana* saw a change from Unfavourable-Bad in 2007 to Unfavourable-Inadequate (deteriorating) in 2013 with this apparent improvement due to previously unknown populations being recorded, despite the deteriorating trend (NPWS, 2008; 2013). For 2019, the overall conservation status for *V. moulinsiana* remained Unfavourable-Inadequate (deteriorating) (NPWS, 2019).

The current survey was undertaken in order to collect up-to-date information on the populations of the three Annex II *Vertigo* species across Ireland. This information was used in preparing the National Conservation Assessments (NCAs) for the three Annex II *Vertigo* species, as required under Article 17.

2 Methodology

2.1 Site selection

Moorkens & Killeen (2011) surveyed a total of 21 sites for *V. angustior*, 22 for *V. geyeri* and 20 for *V. moulinsiana* in the monitoring period 2007-2012, with some sites supporting more than one of the target species. In the monitoring period 2013-2018, Long & Brophy (2019) carried out repeat surveys for 54 of the 63 sites surveyed by Moorkens & Killeen (2011), with three new sites added for *V. moulinsiana*, two for *V. geyeri* and one for *V. angustior*, which were discovered since the 2007-2012 surveys. Several sites were omitted due to the complete loss of the species and its suitable habitat at those sites, with other sites omitted as they were part of separate monitoring projects.

In the current project, 60 sites (in 52 locations) were selected for survey. The selection of sites was based on the historical list of sites for the target species, adding three new *V. moulinsiana* sites that were discovered since 2017. Again, several sites were omitted due to the complete loss of the species and its suitable habitat at those sites, or because they are part of separate monitoring projects.

The 20 sites surveyed for *V. angustior* in the current monitoring period are presented in Table 1, the 19 *V. geyeri* sites in Table 2, and the 21 *V. moulinsiana* sites in Table 3. All site locations are illustrated in Figure 1.

Table 1 List of *Vertigo angustior* sites surveyed as part of the current monitoring project. * = Sites where two of the species have been previously recorded. ** = Sites where all three species have been previously recorded

Site code	Site name	County
VaCAM01	Beal Point	Kerry
VaCAM02	Derrynane	Kerry
VaCAM03	Dooaghtry	Mayo
VaCAM04	Glencolmcille	Donegal
VaCAM05	Kilshannig	Kerry
VaCAM06	Kinlackagh Bay	Donegal
VaCAM07	Maharees	Kerry
VaCAM08	Dog's Bay	Galway
VaCAM10	Killanley Glebe	Sligo
VaCAM11	Lahinch	Clare
VaCAM12	Malin Dunes	Donegal
VaCAM13	Pollardstown Fen**	Kildare
VaCAM14	Streedagh Point Dunes	Sligo
VaCAM15	Bartraw	Mayo
VaCAM16	Inishmore Island	Galway
VaCAM17	Curragh Chase*	Limerick
VaCAM19	Louisa Bridge*	Kildare
VaCAM20	Ballysadare Bay	Sligo
VaCAM21	Strandhill Airport	Sligo
VaCAM22	Waterstown Lough**	Westmeath

Table 2 List of *Vertigo geyeri* sites surveyed as part of the current monitoring project. * = Sites where two of the species have been previously recorded. ** = Sites where all three species have been previously recorded

Site code	Site name	County
VgCAM01	Meenaphull	Leitrim
VgCAM02	Tievebaun	Leitrim
VgCAM03	Brackloon	Mayo
VgCAM04	Clonaslee Eskers	Laois
VgCAM05	Dooaghtry	Mayo
VgCAM06	Drimmon Lough	Roscommon
VgCAM08	Sheskinmore Lough	Donegal
VgCAM09	Annaghmore Lough	Roscommon
VgCAM10	Ballyness Bay	Donegal
VgCAM13	Easkey Valley	Sligo
VgCAM14	Polagull Bay	Donegal
VgCAM15	Silver River	Laois
VgCAM16	Fermoyle	Mayo
VgCAM18	Fin Lough (Offaly)*	Offaly
VgCAM20	Lisduff Fen*	Offaly
VgCAM21	Ox Mountains	Sligo
VgCAM22	Pollardstown Fen**	Kildare
VgCAM23	Waterstown Lough**	Westmeath
VgCAM24	Duleek Commons	Meath

Table 3 List of *Vertigo moulinsiana* sites surveyed as part of the current monitoring project. Sites not included in any previous monitoring surveys are underlined. * = Sites where two of the species have been previously recorded. ** = Sites where all three species have been previously recorded

Site code	Site name	County
VmCAM01	Borris	Carlow
VmCAM02	Fin Lough (Offaly)*	Offaly
VmCAM03	Lough Owel	Westmeath
VmCAM04	Mountmellick	Laois
VmCAM05	Louisa Bridge*	Kildare
VmCAM06	Ballybeg Lough	Clare
VmCAM08	Cappankelly	Westmeath
VmCAM09	Waterstown Lough**	Westmeath
VmCAM10	Ballynafagh Lake	Kildare
VmCAM11	Charleville Lake	Offaly
VmCAM12	Curragh Chase*	Limerick
VmCAM14	Kildallan Bridge	Westmeath
VmCAM16	Lisduff Fen*	Offaly
VmCAM17	The Murrough	Wicklow
VmCAM18	Poliardstown Fen**	Kildare
VmCAM19	Portumna	Galway
VmCAM21	Royal Canal, Longford Bridge	Longford
VmCAM23	Castletown	Waterford
VmCAM24	Gollierstown	Dublin
VmCAM25	Louisa Bridge (South)	Kildare
VmCAM26	Loughmerans	Kilkenny

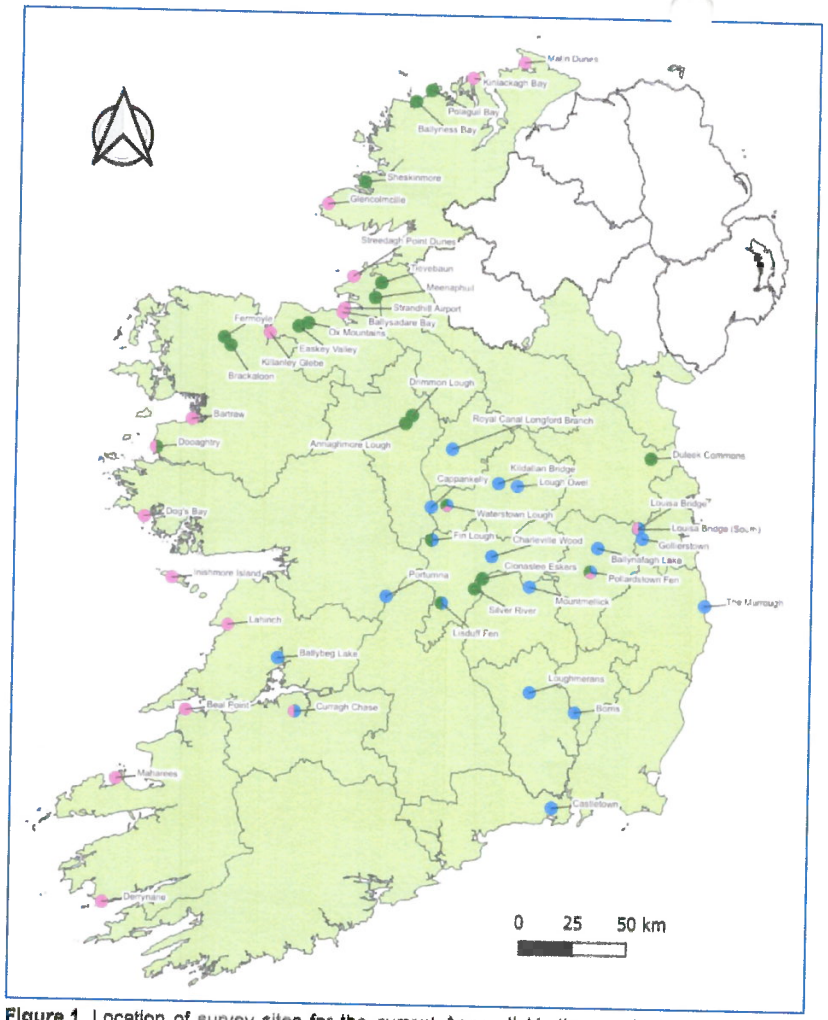


Figure 1 Location of survey sites for the current Annex II *Vertigo* monitoring survey. Pink indicates *Vertigo angustior* sites, green indicates *Vertigo geyeri* sites and blue indicates *Vertigo moulinsiana* sites. Note that some sites support more than one species.

2.2 Survey methodology

The survey methodologies for all three species followed those of Long & Brophy (2019) and, in the interest of brevity, will not be fully detailed here; however, deviations from that methodology will be set out.

1. During the current survey, full vegetation species lists and covers were not recorded from sample locations in Turboveg as it was by Long & Brophy (2019). Instead, a list of plant species present at each sample location was recorded in QGIS.
2. Data were recorded on ruggedized tablet running Android with QField, compared to the Trimble Nomad handheld computer running Windows Mobile with ArcPad used by Long & Brophy (2019).

For *Vertigo moulinsiana*, in order to maintain consistency, the vegetation classes established previously were used for existing sites, while those recommended in Section 4.4.9 of Long & Brophy (2019) were used for sites monitored for the first time during the current survey.

3 Results

3.1 Overview of results

The field surveys for the three *Vertigo* species were carried out over the summer and autumn of 2021-2024. The core field team comprised John Brophy and Orla Daly, with assistance from Jessica Hamilton and Jim Martin. The target species were recorded from 41 of the 60 sites surveyed. By species, this breaks down as 11 of 20 sites for *V. angustior*, 9 of 19 sites for *V. geyeri* and 21 of 21 sites for *V. moulinsiana*. A summary paragraph for each of the sites surveyed is presented in Appendix I.

At some sites, the broadly positive result masks a decline in the population and/or habitat at these sites. To understand the details of any given site, it is necessary to refer to the relevant species section within this report and the site reports presented in Appendices II-IV.

3.2 Vertigo angustior results

3.2.1 Vertigo angustior overview

Twenty sites were surveyed for *Vertigo angustior* across the field seasons 2022-2024. All 20 sites were previously surveyed by Long & Brophy (2019), with VaCAM22 Waterstown Lough added after Moorkens & Killeen (2011) discovered the species along with *V. geyeri* during 2007-2012 monitoring of *V. moulinsiana* at the site. *Vertigo angustior* was recorded from 11 of the 20 sites surveyed (Table 4).

Table 4 List of *Vertigo angustior* sites surveyed during the 2019-2024 monitoring period, and whether the site was positive or negative for the species in this round of monitoring and the previous two rounds

Site code	Site name	2007-12	2013-18	2019-24
VaCAM01	Beal Point	Positive	Positive	Positive
VaCAM02	Derrynane	Positive	Positive	Positive
VaCAM03	Dooaghtry	Positive	Positive	Positive
VaCAM04	Glencolmcille	Negative	Negative	Negative
VaCAM05	Kilshannig	Positive	Positive	Positive
VaCAM06	Kinlackagh Bay	Positive	Positive	Negative
VaCAM07	Maharees	Positive	Positive	Positive
VaCAM08	Dog's Bay	Positive	Positive	Positive
VaCAM10	Killanley Glebe	Positive	Positive	Negative
VaCAM11	Lahinch	Positive	Positive	Negative
VaCAM12	Malin Dunes	Positive	Positive	Positive
VaCAM13	Pollardstown Fen	Positive	Positive	Negative
VaCAM14	Streedagh Point Dunes	Positive	Positive	Positive
VaCAM15	Bartraw	Positive	Positive	Positive
VaCAM16	Inishmore Island	Positive	Positive	Negative
VaCAM17	Curragh Chase	Positive	Negative	Negative
VaCAM19	Louisa Bridge	Negative	Negative	Negative
VaCAM20	Ballysadare Bay	Positive	Positive	Positive
VaCAM21	Strandhill Airport	Positive	Positive	Positive
VaCAM22	Waterstown Lough	N/A	Positive	Negative

The number of positive sites has declined by six since the 2013-2018 monitoring survey and these include both coastal and inland sites.

All of the sites fall within SACs, with the exception of VaCAM11 Lahinch, which has only a very small overlap with an SAC, and VaCAM22 Waterstown Lough, which is entirely outside the SAC network.

3.2.2 Vertigo angustior population

While the results presented in Section 3.2.1 show a significant (35%) decline in the number of positive sites for *V. angustior* as compared to the 2013-2018 monitoring period, this does not fully describe the situation with regard to the *V. angustior* populations at the survey sites. Even at sites that were positive for the species, many of them have shown a decline in the number or percentage of positive samples as compared to previous monitoring periods. These declines are detailed in the individual site reports (Appendix II).

A broad comparison of the percentage of positive samples at the surveyed *V. angustior* sites across the three monitoring periods is presented in Table 5. This illustrates the general downward trajectory in the percentage of positive samples that has been occurring for *V. angustior* since 2013-18, with 14 sites showing a decrease in the percentage of positive samples, one site showing an increase, and five sites being stable/unchanged (though three of these stable sites had 0% positive samples in 2013-18).

Table 5 A comparison of the percentage (%) of positive samples locations at *V. angustior* sites surveyed across the 2007-12, 2013-18 and 2019-24 monitoring periods

Site ID	Site name	2007-12 (% positive)	2013-18 (% positive)	2019-24 (% positive)
VaCAM01	Beal Point	35	35	35
VaCAM02	Derrynane	46	36	18
VaCAM03	Dooaghtry	100	56	11
VaCAM04	Glencolmcille	0	0	0
VaCAM05	Kilshannig	63	21	7
VaCAM06	Kinlackagh Bay	77	44	0
VaCAM07	Maharees	15	17	6
VaCAM08	Dog's Bay	14	14	14
VaCAM10	Killanley Glebe	43	80	0
VaCAM11	Lahinch	61	7	0
VaCAM12	Malin Dunes	32	75	31
VaCAM13	Pollardstown Fen	67	13	0
VaCAM14	Streedagh Point Dunes	71	93	59
VaCAM15	Bartraw	76	82	92
VaCAM16	Inishmore Island	83	27	0
VaCAM17	Curragh Chase	56	0	0
VaCAM19	Louisa Bridge	0	0	0
VaCAM20	Ballysadare Bridge	100	92	50
VaCAM21	Strandhill Airport	60	21	7
VaCAM22	Waterstown Lough	NA	25	0

The Population status for each site was assessed based mainly on the criteria of Moorkens & Killeen (2011), with occasional additions or amendments by Long & Brophy (2019). Due to the nature of the assessment criteria (detailed in the individual site reports), in some cases the number or percentage of positive samples may remain unchanged, but a criterion may now fail due to the distribution of the positive samples within the site. The reason for any change in Population status at a site level is presented in Table 6.

Table 6 A comparison of the Population status at *V. angustior* sites surveyed across the 2013-18 and 2019-24 monitoring periods, including the reason for any change

Site ID	Site name	2013-18	2019-24	Reason for change
VaCAM01	Beal Point	Amber	Red	Drop in status due to the loss of two positive samples from transect
VaCAM02	Derrynane	Amber	Red	Drop in status due to a drop in number of positive samples across the site
VaCAM03	Dooaghtry	Green	Red	Drop in status due to a drop in number of positive samples along transect and across the site
VaCAM04	Glencolmcille	Red	Red	No change
VaCAM05	Kilshannig	Red	Red	No change
VaCAM06	Kinlackagh Bay	Amber	Red	Drop in status due to the number of positive samples across the site dropping to zero
VaCAM07	Maharees	Red	Red	No change
VaCAM08	Dog's Bay	Green	Red	Drop in status due to no positive samples within the grassy hollow with freshwater upwelling
VaCAM10	Killanley Glebe	Green	Red	Drop in status due to the number of positive samples across the site dropping to zero
VaCAM11	Lahinch	Red	Red	No change
VaCAM12	Malin Dunes	Green	Red	Drop in status due to a drop in number of positive samples along transect and across the site
VaCAM13	Pollardstown Fen	Red	Red	No change
VaCAM14	Streedagh Point Dunes	Green	Amber	Drop in status due to a drop in number of positive samples along transect
VaCAM15	Bartraw	Green	Green	No change
VaCAM16	Inishmore Island	Amber	Red	Drop in status due to the number of positive samples across the site dropping to zero
VaCAM17	Curragh Chase	Red	Red	No change
VaCAM19	Louisa Bridge	Red	Red	No change
VaCAM20	Ballysadare Bridge	Green	Red	Drop in status due to a drop in number of positive samples along transect and across the site
VaCAM21	Strandhill Airport	Red	Red	No change
VaCAM22	Waterstown Lough	Green	Red	Drop in status due to the number of positive samples across the site dropping to zero

3.2.3 *Vertigo angustior* habitat

A total of 992.08 ha of *V. angustior* habitat was included in the current survey of 20 sites, with 851.20 ha having some suitability for supporting the snail (Suboptimal-Unsuitable or better) and 140.89 ha considered Unsuitable (Table 7).

Table 7 A breakdown of *Vertigo angustior* habitat suitability class, in hectares (ha) and percent (%), surveyed during the 2019-2024 monitoring period

Habitat suitability class	Area (ha)	Area (%)
Optimal	78.10	7.9
Optimal-Suboptimal	181.99	18.3
Suboptimal	219.17	22.1
Suboptimal-Unsuitable	371.95	37.5
Unsuitable	140.89	14.2
TOTAL	992.08	

The total area surveyed dropped from 1045.66 ha in 2013-2018 to 992.08 ha in the current survey due to the removal of VaCAM09 Fanore from the survey schedule for the 2019-2024 monitoring period, dropping the total number of sites surveyed from 21 to 20.

The comparison of habitat suitability areas between the current and previous monitoring periods (2013-2018 and 2019-2024) is slightly complicated by the fact that the list of sites surveyed differs between monitoring periods. For this reason, the comparison is based on the figures relating to the surveyed sites that both monitoring periods have in common (Table 8).

Table 8 A comparison *Vertigo angustior* habitat suitability area in hectares (ha) between the 2013-2018 and 2019-2024 monitoring periods. Both ecological and interpreted changes are included. Excludes VaCAM09, which was not surveyed in 2019-2024

Habitat suitability class	2013-2018	2019-2024	Difference (ha)	Difference (%)
Optimal	69.22	78.10	+8.88	+12.8
Optimal-Suboptimal	149.17	181.99	32.82	+22.0
Suboptimal	278.44	219.17	-59.28	-21.3
Suboptimal-Unsuitable	347.40	371.95	+24.55	+7.1
Unsuitable	147.86	140.89	-6.97	-4.7
TOTAL	992.08	992.08		

The total area surveyed at the 20 sites visited during the two monitoring periods remains unchanged. There has been an increase in the area of Optimal (+12.8%), Optimal-Suboptimal (+22.0%) and Suboptimal-Unsuitable (+7.1%) habitat between the monitoring periods, while a decrease in the area of Suboptimal (-21.3%) and Unsuitable (-4.7%) habitat was recorded.

The Habitat status for each site was assessed based mainly on the criteria of Moorkens & Killeen (2011), with occasional additions or amendments by Long & Brophy (2019). Due to the nature of the assessment criteria (detailed in the individual site reports), in some cases the area of suitable habitat may change, but a criterion may still pass or fail as the change in the area of suitable habitat is not sufficient to change the result. The reason for any change in Habitat status at a site level is presented in Table 9.

Table 9 A comparison of the Habitat status at *Vertigo angustior* sites surveyed across the 2013-18 and 2019-24 monitoring periods, including the reason for any change

Site ID	Site name	2013-18	2019-24	Reason for change
VaCAM01	Beal Point	Amber	Amber	No change
VaCAM02	Derrynane	Amber	Red	Drop in status due to a drop in suitable habitat along transect and across the site
VaCAM03	Doogahtry	Green	Amber	Drop in status due to a drop in suitable wetness and thatch along transect
VaCAM04	Glencolmcille	Amber	Green	Improvement in status to an increase in the suitable habitat along the transect
VaCAM05	Kilshannig	Red	Red	No change
VaCAM06	Kinlackagh Bay	Red	Red	No change
VaCAM07	Maharees	Red	Red	No change
VaCAM08	Dog's Bay	Red	Red	No change
VaCAM10	Killenley Glebe	Green	Green	No change
VaCAM11	Lahinch	Green	Amber	Drop in status due to a drop in the suitable habitat along the transect
VaCAM12	Malin Dunes	Red	Red	No change
VaCAM13	Pollardstown Fen	Red	Red	No change
VaCAM14	Streedagh Point Dunes	Amber	Amber	No change
VaCAM15	Bartraw	Green	Green	No change
VaCAM16	Inishmore Island	Amber	Red	Drop in status due to a drop in the suitable habitat and wetness along the transect
VaCAM17	Curragh Chase	Red	Red	No change
VaCAM19	Louisa Bridge	Red	Red	No change
VaCAM20	Ballysadare Bridge	Green	Red	Drop in status due to a drop in the suitable habitat and wetness along the transect
VaCAM21	Strandhill Airport	Red	Red	No change
VaCAM22	Waterstown Lough	Green	Red	Drop in status due to a drop in the suitable habitat across the site

The reasons for the changes to the habitat suitability class are divided into those that are ecological in nature (*e.g.* drying out, grazing level altering the vegetation structure) and interpretation (*e.g.* view that previous assessment was inaccurate, but no actual ecological change is thought to have occurred). The positive and negative changes that have affected the area covered by the five habitat suitability classes are set out in Table 10 and Table 11, respectively.

Table 10 A breakdown of the positive *Vertigo angustior* habitat suitability changes recorded in 2019-2024 with reason for change. *O = Optimal, O-SO = Optimal-Suboptimal, SO = Suboptimal, SO-U = Suboptimal-Unsuitable, U = Unsuitable. **Eco = Ecological, Int = Interpreted

Site ID	Site name	2013-2018*	2019-2024*	Area (ha)	Change**
VaCAM04	Glencolmcille	U	SO-U	8.43	Eco - Habitat is slight more suitable, particularly in the northwest
VaCAM06	Kinlackagh Bay	S-US	SO	0.83	Eco - Enough suitable habitat present to justify increase
VaCAM06	Kinlackagh Bay	S-US	SO	16.62	Eco - Low level of grazing has allowed more suitable habitat to develop
VaCAM07	Maharees	SO	O-SO	31.39	Eco - Reduction in grazing pressure
VaCAM14	Streedagh Point Dunes	SO	O-SO	9.37	Eco - Sward more open, with less dense, sodden thatch
VaCAM15	Bartraw	O-SO	O	3.68	Int - More suitable habitat present than previously considered

Table 11 A breakdown of the negative *Vertigo angustior* habitat suitability changes recorded in 2019-2024 with reason for change. *O = Optimal, O-SO = Optimal-Suboptimal, SO = Suboptimal, SO-U = Suboptimal-Unsuitable, U = Unsuitable. **Eco = Ecological, Int = Interpreted

Site ID	Site name	2013-2018*	2019-2024*	Area (ha)	Change
VaCAM01	Beal Point	SO	SO-U	6.36	Eco - Heavy overgrazing has resulted in no *Festuca rubra* thatch, with forbs dominating
VaCAM02	Derrynane	SO	SO-U	7.68	Eco - Overgrazed by rabbits and disturbed by burrows
VaCAM16	Inishmore Island	SO	SO-U	16.51	Eco - Sward grazed short and very dry
VaCAM16	Inishmore Island	SO	SO-U	1.3	Eco - Bryophyte layer is replacing *F. rubra* thatch
VaCAM16	Inishmore Island	SO-U	U	1.46	Int - Disturbance from historical sand quarrying and habitat too dry
VaCAM17	Curragh Chase	SO	SO-U	3.19	Eco - Most of the fen is too wet for snail, with rank grasses and rushes causing loss of bryophyte layer
VaCAM22	Waterstown Lough	O-SO	SO	2.64	Eco - Limited bryophyte layer and lack of light *F. rubra* litter, likely due to grazing

Whorl Snail Monitoring 2/2

3.2.4 *Vertigo angustior* pressures and threats

Pressures are considered to be factors which have acted within a reporting period, while threats are factors expected to be acting in the future. It is possible for the same impact to be both a pressure and a threat if it is having an impact now and this impact is likely to continue. The pressures and threats relevant to the *V. angustior* population at the survey sites were recorded following the pressures list 2019-2024 reporting period for Articles 12 and 17. A total of 17 pressures or threats were recorded across the 20 *V. angustior* sites (Table 12) and all sites had at least one negative pressure recorded.

The most frequently recorded pressure was PM07 *Natural processes without direct or indirect influence from human activities or climate change*. This is a broad category that was recorded from 70% of surveyed sites, with this negative pressure generally referring to marine erosion along the seaward edge of sand dune systems, and occasionally scrub encroachment.

PA07 *Intensive grazing or overgrazing by livestock* was recorded at 65% of the surveyed sites, and related to cattle, sheep and, occasionally, horses. The negative effect of grazing included the removal of a well-developed *Festuca rubra* thatch, and a reduction in the formation of *Ammophila arenaria* tussocks. On two occasions, this pressure was considered to be having a positive effect and one occasion a neutral effect.

PF05 *Sports, tourism and leisure activities* was recorded from 45% of the surveyed sites, with this negative pressure most commonly relating to trampling caused by walkers, but also golf courses and caravan parks.

PI02 Other invasive alien species (other than species of Union concern) was recorded from 40% of sites and related to a range of invasive alien species, the most significant of which was *Hippophae rhamnoides*. Less important examples included *Polygonum wallichii*, *Acer pseudoplatanus*, *Phormium tenax*, *Pinus contorta*, *Petasites pyrenaicus*, and *Montbretia*.

PI03 *Problematic native species* was recorded from 35% of the sites and included rabbits (*Oryctolagus cuniculus*) through burrowing and tight grazing of the sward, reducing or removing the *Festuca rubra* thatch, and sometimes the *Ammophila arenaria* from places.

PJ03 *Changes in precipitation regimes due to climate change* was noted for 30% of sites in the form of drying out of *Festuca rubra* thatch.

The broad category PA25 *Agriculture activities not referred to above* was recorded from 25% of sites and refers to tractor or other vehicle tracks.

PA05 Abandonment of management/use of grasslands and other agricultural and agroforestry systems (*e.g.* cessation of grazing, mowing or traditional farming) was record for 10% of sites and was due to vegetation becoming rank and more unsuitable for supporting the snail.

Killaspugbrone Looped Trail

Table 12 List of the pressures and threats recorded at the *Vertigo angustior* sites surveyed during the 2019-2024 monitoring period in decreasing order of frequency of occurrence

Pressure/ threat code	Pressure/threat name	Positive	Negative	Neutral	Total
PM07	Natural processes without direct or indirect influence from human activities or climate change	-	14	-	14
PA07	Intensive grazing or overgrazing by livestock	2	10	1	13
PF05	Sports, tourism and leisure activities	-	9	-	9
PI02	Other invasive alien species (other than species of Union concern)	-	8	-	8
PI03	Problematic native species	1	5	1	7
PJ03	Changes in precipitation regimes due to climate change	-	6	-	6
PA25	Agriculture activities not referred to above	-	5	-	5
PA05	Abandonment of management/use of grasslands and other agricultural and agroforestry systems (e.g. cessation of grazing, mowing or traditional farming)	-	2	-	2
PA01	Conversion into agricultural land (excluding drainage and burning)	-	1	-	1
PA08	Extensive grazing or undergrazing by livestock	-	1	-	1
PA13	Application of natural or synthetic fertilisers on agricultural land	-	1	-	1
PB01	Conversion to forest from other land uses, or afforestation (excluding drainage)	-	1	-	1
PF01	Conversion from other land uses to built-up areas	-	0	1	1
PF03	Creation or development of sports, tourism and leisure infrastructure	-	0	1	1
PF06	Deposition and treatment of waste/rubbish from built-up areas	-	1	-	1
PH08	Other human intrusions and disturbance not mentioned above	-	1	-	1
PJ07	Cyclones, storms, or tornados due to climate change	-	1	-	1

The remaining nine pressures and threats recorded were only noted for one site (5% of the sites surveyed). Of the agricultural pressures, PA01 *Conversion into agricultural land (excluding drainage and burning)* related to potato cultivation on fixed dunes, PA08 *Extensive grazing or undergrazing by livestock* was noted where rank agricultural grasses had been allowed to develop on fixed dune habitat, and PA13 *Application of natural or synthetic fertilisers on agricultural land* occurred on improved grassland above the *V. angustior* site. PB01 *Conversion to forest from other land uses, or afforestation (excluding drainage)* occurred where *Salix* spp. and *Alnus glutinosa* was planted and continues to grow. PF01 *Conversion from other land uses to built-up areas* refers to one-off housing built above the site, PF03 *Creation or development of sports, tourism and leisure infrastructure* related to a golf course, while PF06 *Deposition and treatment of waste/rubbish from built-up areas* was for the dumping of artificial grass and grass cuttings on a golf course. The pressure PH08 *Other human intrusions and disturbance not mentioned above* was for the dumping of round hay bales on

dunes, while PJ07 *Cyclones, storms, or tornados due to climate change* rel to the greatly increased erosion of the front the dune system.

3.2.4.1 Negative pressures/threats

In terms of the intensity of the negative effect of the recorded pressures and threats, and the area affected, PJ03 *Changes in precipitation regimes due to climate change* was considered to be having the most widespread effect, with a High intensity recorded over 482.30 ha across five sites (Table 13). This was followed by PA07 *Intensive grazing or overgrazing by livestock* (22.68 ha) and PM07 *Natural processes without direct or indirect influence from human activities or climate change* (19.50 ha). The remaining High intensity negative effects were PI02 *Other invasive alien species (other than species of Union concern)* (13.51 ha), PI03 *Problematic native species* (9.9 ha), PJ07 *Cyclones, storms, or tornados due to climate change* (3.97 ha), PA13 *Application of natural or synthetic fertilisers on agricultural land* (3.19 ha), PA05 *Abandonment of management/use of grasslands and other agricultural and agroforestry systems (e.g. cessation of grazing, mowing or traditional farming)* (1.40 ha), PB01 *Conversion to forest from other land uses, or afforestation (excluding drainage)* (0.20 ha), PH08 *Other human intrusions and disturbance not mentioned above* (0.13 ha), PF06 *Deposition and treatment of waste/rubbish from built-up areas* (0.11 ha) and PA01 *Conversion into agricultural land (excluding drainage and burning)* (0.08 ha).

Of the Medium intensity negative pressures, PA07 *Intensive grazing or overgrazing by livestock* was the most extensive at 409.22 ha across four sites. This was followed by PF05 *Sports, tourism and leisure activities* (150.24 ha), PJ03 *Changes in precipitation regimes due to climate change* (129.45 ha) and PA05 *Abandonment of management/use of grasslands and other agricultural and agroforestry systems (e.g. cessation of grazing, mowing or traditional farming)* (52.92 ha) and PM07 *Natural processes without direct or indirect influence from human activities or climate change* (28.95 ha). The remaining Medium intensity negative effects were PA08 *Extensive grazing or undergrazing by livestock* (18.17 ha), PI03 *Problematic native species* (12.28 ha), PA25 *Agriculture activities not referred to above* (1.42 ha) and PI02 *Other invasive alien species (other than species of Union concern)* (0.11 ha).

The remaining negative pressures were of Low intensity, with the most extensive being PI03 *Problematic native species* (79.69 ha), followed by PA07 *Intensive grazing or overgrazing by livestock* (41.91 ha) and PF05 *Sports, tourism and leisure activities* (21.51 ha). The remaining Low intensity negative effects were PM07 *Natural processes without direct or indirect influence from human activities or climate change* (2.34 ha), PI02 *Other invasive alien species (other than species of Union concern)* (0.10 ha) and PA25 *Agriculture activities not referred to above* (0.04 ha).

Table 13 Pressures and threats recorded as having a negative influence at *Vertigo angustior* sites during the 2019-2024 monitoring survey, ranked in order of Intensity (High to Low) and Area affected (High to Low)

Pressure/ threat code	Pressure/threat name	Intensity	Area affected (ha)	No. of sites
PJ03	Changes in precipitation regimes due to climate change	High	482.30	5
PA07	Intensive grazing or overgrazing by livestock	High	22.68	4
PM07	Natural processes without direct or indirect influence from human activities or climate change	High	19.50	8
PI02	Other invasive alien species (other than species of Union concern)	High	13.51	5
PI03	Problematic native species	High	9.90	2
PJ07	Cyclones, storms, or tornados due to climate change	High	3.97	1
PA13	Application of natural or synthetic fertilisers on agricultural land	High	3.19	1
PA05	Abandonment of management/use of grasslands and other agricultural and agroforestry systems (*e.g.* cessation of grazing, mowing or traditional farming)	High	1.40	1
PB01	Conversion to forest from other land uses, or afforestation (excluding drainage)	High	0.20	1
PH08	Other human intrusions and disturbance not mentioned above	High	0.13	1
PF06	Deposition and treatment of waste/rubbish from built-up areas	High	0.11	1
PA01	Conversion into agricultural land (excluding drainage and burning)	High	0.08	1
PA07	Intensive grazing or overgrazing by livestock	Medium	409.22	4
PF05	Sports, tourism and leisure activities	Medium	150.24	6
PJ03	Changes in precipitation regimes due to climate change	Medium	129.45	1
PA05	Abandonment of management/use of grasslands and other agricultural and agroforestry systems (*e.g.* cessation of grazing, mowing or traditional farming)	Medium	52.92	1
PM07	Natural processes without direct or indirect influence from human activities or climate change	Medium	28.95	3
PA08	Extensive grazing or undergrazing by livestock	Medium	18.17	1
PI03	Problematic native species	Medium	12.28	1
PA25	Agriculture activities not referred to above	Medium	1.42	3
PI02	Other invasive alien species (other than species of Union concern)	Medium	0.11	1
PI03	Problematic native species	Low	79.69	2
PA07	Intensive grazing or overgrazing by livestock	Low	41.91	2
PF05	Sports, tourism and leisure activities	Low	21.51	3
PM07	Natural processes without direct or indirect influence from human activities or climate change	Low	2.34	3
PI02	Other invasive alien species (other than species of Union concern)	Low	0.10	2
PA25	Agriculture activities not referred to above	Low	0.04	2

3.2.4.2 Positive pressures/threats

Two positive pressures were identified during the current survey (Table 14). Neither was identified as a conservation measure, but rather as a pressure that was operating at a level that was having an overall positive effect. PA07 *Intensive grazing or overgrazing by livestock* affected 132.64 ha of *V. angustior* habitat at one site and related to cattle grazing at a level that was maintaining an open *Ammophila arenaria* and *Festuca rubra* dominated sward. PI03 *Problematic native species* refers to a low level of grazing by rabbits, where it helps keep the fixed dune sward open, but has not reached a level that negatively impacts on the *F. rubra* thatch.

Table 14 Pressures and threats recorded as having a positive influence at *Vertigo angustior* sites during the 2019-2024 monitoring survey, ranked in order of Intensity (High to Low) and Area affected (High to Low)

Pressure/ threat code	Pressure/threat name	Intensity	Area affected (ha)	No. of sites
PA07	Intensive grazing or overgrazing by livestock	Low	132.64	2
PI03	Problematic native species	Low	23.72	1

3.2.4.3 Neutral pressures/threats

Four neutral pressures and threats were identified during the current survey (Table 15). The most extensive pressure was PF03 *Creation or development of sports, tourism and leisure infrastructure* (22.17 ha), which referred to a long-established golf course with suitable habitat in the rough. PI03 *Problematic native species* affected 8.9 ha of the *V. angustior* habitat, while PF01 *Conversion from other land uses to built-up areas* (0.79 ha) and PA07 *Intensive grazing or overgrazing by livestock* (0.78 ha).

Table 15 Pressures and threats recorded as having a neutral influence at *Vertigo angustior* sites during the 2019-2024 monitoring survey, ranked in order of Intensity (High to Low) and Area affected (High to Low)

Pressure/ threat code	Pressure/threat name	Intensity	Area affected (ha)	No. of sites
PF03	Creation or development of sports, tourism and leisure infrastructure	Low	22.17	1
PI03	Problematic native species	Low	8.90	1
PF01	Conversion from other land uses to built-up areas	Low	0.79	1
PA07	Intensive grazing or overgrazing by livestock	Low	0.78	1

3.2.5 *Vertigo angustior* site conservation assessments

Individual site conservation assessments were carried out for *Vertigo angustior* sites surveyed during the current monitoring project. The assessment of Population and Habitat for each site was based on criteria set by Moorkens & Killeen (2011) and Long & Brophy (2019), with Future Prospects based on the future trends of Population and Habitat considering the pressures and threats relevant to the site and the effect of any conservation measures that have been implement or will be implemented in the future (DG Environment, 2023). The Overall Conservation Assessment is based on the lowest score achieved across the three elements. Table 16 presents the site conservation assessments for the 20 *V. angustior* sites assessed

during the current monitoring period, with the 2007-2012 and 2013-2018 results included for comparison.

There has been a clear decline in the conservation status of the *V. angustior* sites across the three monitoring periods. In 2007-2012, there were 11 Green sites, four Amber and four Red, which dropped to four Green sites (including VaCAM22 Waterstown Lough, which was assessed for the first time), five Amber sites and 11 Red sites in 2013-2018. In the current round of monitoring, there was one Green site, one Amber site and 18 Red sites. Only one site, VaCAM15 Bartraw, has remained consistently Green across the three monitoring periods.

Full details of the criteria used in carrying out the Population and Habitat assessments are presented in the *V. angustior* site reports in Appendix II.

Table 16 Site conservation assessments for *Vertigo angustior* across the last three monitoring periods for the sites surveyed during the current monitoring period. Pop = Population, Hab = Habitat, FP = Future Prospects

Site ID	Site name	2007-2012				2013-2018				2019-2024			
		Pop	Hab	FP	Overall	Pop	Hab	FP	Overall	Pop	Hab	FP	Overall
VaCAM01	Beal Point	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Red	Amber	Red	Red
VaCAM02	Derrynane	Green	Green	Green	Green	Amber	Amber	Amber	Amber	Red	Red	Amber	Red
VaCAM03	Doogahtry	Green	Green	Green	Green	Green	Green	Amber	Amber	Red	Amber	Red	Red
VaCAM04	Glencolmcille	Red	Amber	Amber	Red	Red	Amber	Red	Red	Red	Green	Red	Red
VaCAM05	Kilshannig	Green	Green	Green	Green	Red	Red	Amber	Red	Red	Red	Red	Red
VaCAM06	Kinlackagh Bay	Amber	Red	Amber	Red	Amber	Red	Amber	Red	Red	Red	Red	Red
VaCAM07	Maharees	Red	Red	Amber	Red	Red	Red	Amber	Red	Red	Red	Red	Red
VaCAM08	Dog's Bay	Green	Green	Green	Green	Green	Red	Amber	Red	Red	Red	Amber	Red
VaCAM10	Kilfenley Glebe	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Amber	Red
VaCAM11	Lahinch	Green	Green	Green	Green	Red	Green	Amber	Red	Red	Amber	Red	Red
VaCAM12	Malin Dunes	Green	Green	Green	Green	Green	Red	Green	Red	Red	Red	Red	Red
VaCAM13	Pollardstown Fen	Green	Green	Amber	Amber	Red	Red	Red	Red	Red	Red	Red	Red
VaCAM14	Streedagh Point Dunes	Green	Green	Green	Green	Green	Amber	Green	Amber	Amber	Amber	Amber	Amber
VaCAM15	Bartraw	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
VaCAM16	Inishmore Island	Green	Green	Green	Green	Amber	Amber	Amber	Amber	Red	Red	Red	Red
VaCAM17	Curragh Chase	Green	Amber	Amber	Amber	Red	Red	Red	Red	Red	Red	Red	Red
VaCAM19	Louisa Bridge	Red	Amber	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red
VaCAM20	Ballysadare Bay	Green	Green	Green	Green	Green	Green	Green	Green	Red	Red	Red	Red
VaCAM21	Strandhill Airport	Green	Amber	Amber	Amber	Red	Red	Amber	Red	Red	Red	Red	Red
VaCAM22	Waterstown Lough	NA	NA	NA	NA	Green	Green	Green	Green	Red	Red	Red	Red

3.3 *Vertigo geyeri* results

3.3.1 *Vertigo geyeri* overview

Nineteen sites were surveyed for *Vertigo geyeri* across the field seasons 2022-2024. All 19 sites were previously surveyed by Long & Brophy (2019), with VgCAM23 Waterstown Lough added since Moorkens & Killeen (2011) discovered the species along with *V. angustior* during 2007-2012 monitoring of *V. moulinsiana* at the site, and VgCAM24 Duleek Commons also added since 2007-2012. *Vertigo geyeri* was recorded at nine of the 19 sites surveyed (Table 17).

Table 17 List of *Vertigo geyeri* sites surveyed during the 2019-2024 monitoring period, and whether the site was positive or negative for the species in this round of monitoring and the previous two rounds

Site code	Site name	2007-12	2013-18	2019-24
VgCAM01	Meenaphuil	Positive	Positive	Positive
VgCAM02	Tievebaun	Positive	Positive	Positive
VgCAM03	Brackloon	Positive	Positive	Negative
VgCAM04	Clonaslee Eskers	Negative	Negative	Negative
VgCAM05	Dooaghtry	Positive	Positive	Positive
VgCAM06	Drimmon Lough	Positive	Positive	Negative
VgCAM08	Sheskinmore Lough	Positive	Positive	Positive
VgCAM09	Annaghmore Lough	Positive	Negative	Negative
VgCAM10	Ballyness Bay	Positive	Positive	Negative
VgCAM13	Easkey Valley	Positive	Positive	Negative
VgCAM14	Polagull Bay	Positive	Positive	Positive
VgCAM15	Silver River	Positive	Positive	Negative
VgCAM16	Fermoyle	Positive	Positive	Positive
VgCAM18	Fin Lough (Offaly)	Positive	Positive	Positive
VgCAM20	Lisduff Fen	Positive	Negative	Negative
VgCAM21	Ox Mountains	Positive	Positive	Positive
VgCAM22	Pollardstown Fen	Positive	Positive	Negative
VgCAM23	Waterstown Lough	N/A	Positive	Positive
VgCAM24	Duleek Commons	N/A	Positive	Negative

3.3.2 *Vertigo geyeri* population

While the results presented in Section 3.3.1 show a significant (44%) decline in the number of positive sites for *V. geyeri* as compared to the 2013-2018 monitoring period, this does not fully describe the situation with regard to the *V. geyeri* populations at the survey sites. Even at sites that were positive for the species, many of them have shown a decline in the number or percentage of positive samples as compared to previous monitoring periods. These declines are detailed in the individual site reports (Appendix III).

A broad comparison of the percentage of positive samples at the surveyed *V. geyeri* sites across the three monitoring periods is presented in Table 18. This illustrates the general downward trajectory in the percentage of positive samples that has been occurring for *V. geyeri* since 2013-18, with 13 sites showing a decrease in the percentage of positive samples, six

sites remain stable/unchanged (though three of these stable sites had 0% positive samples in 2013-18) and none of the sites are increasing.

Table 18 A comparison of the percentage (%) of positive samples locations at *V. geyeri* sites surveyed across the 2007-12, 2013-18 and 2019-24 monitoring periods

Site ID	Site name	2007-12 (% positive)	2013-18 (% positive)	2019-24 (% positive)
VgCAM01	Meenaphuil	100	100	100
VgCAM02	Tievebaun	91	100	100
VgCAM03	Brackloon	50	50	0
VgCAM04	Clonaslee Eskers	0	0	0
VgCAM05	Dooaghtry	46	57	29
VgCAM06	Drimmon Lough	83	40	0
VgCAM08	Sheskinmore	100	88	75
VgCAM09	Annaghmore Lough	44	0	0
VgCAM10	Ballyness Bay	50	25	0
VgCAM13	Easkey Valley	50	20	0
VgCAM14	Polagull Bay	64	50	50
VgCAM15	Silver River	75	50	0
VgCAM16	Fermoyle	44	50	33
VgCAM18	Fin Lough (Offaly)	100	50	14
VgCAM20	Lisduff Fen	63	0	0
VgCAM21	Ox Mountains	6	5	3
VgCAM22	Pollardstown Fen	70	10	0
VgCAM23	Waterstown Lough	NA	43	14
VgCAM24	Duleek Commons	NA	25	0

The Population status for each site was assessed based mainly on the criteria of Moorkens & Killeen (2011), with occasional additions or amendments by Long & Brophy (2019). Due to the nature of the assessment criteria (detailed in the individual site reports), in some cases the number or percentage of positive samples may remain unchanged, but a criterion may now fail due to the distribution of the positive samples within the site. The reason for any change in Population status at a site level is presented in Table 19.

Table 19 A comparison of the Population status at *V. geyeri* sites surveyed across the 2013-18 and 2019-24 monitoring periods, including the reason for any change

Site ID	Site name	2013-18	2019-24	Reason for change
VgCAM01	Meenaphull	Green	Green	No change
VgCAM02	Tlevebaun	Green	Green	No change
VgCAM03	Brackloon	Red	Red	No change
VgCAM04	Clonaslee Eskers	Red	Red	No change
VgCAM05	Dooaghtry	Amber	Amber	No change
VgCAM06	Drimmon Lough	Red	Red	No change
VgCAM08	Sheskinmore	Green	Green	No change
VgCAM09	Annaghmore Lough	Red	Red	No change
VgCAM10	Ballyness Bay	Red	Red	No change
VgCAM13	Easkey Valley	Red	Red	No change
VgCAM14	Polagull Bay	Amber	Amber	No change
VgCAM15	Silver River	Green	Red	Drop in status due to the number of positive samples across the site dropping to zero
VgCAM16	Fermoyle	Green	Amber	Drop in status due to the number of positive samples within Polygon B dropping to zero
VgCAM18	Fin Lough (Offaly)	Green	Red	Drop in status due to a drop in the number of positive samples on transect and across the site
VgCAM20	Lisduff Fen	Red	Red	No change
VgCAM21	Ox Mountains	Amber	Amber	No change
VgCAM22	Pollardstown Fen	Red	Red	No change
VgCAM23	Waterstown Lough	Green	Amber	Drop in status due to a drop in the number of positive samples across the site, away from the transect, to zero
VgCAM24	Duleek Commons	Green	Red	Drop in status due to the number of positive samples across the site dropping to zero

3.3.3 *Vertigo geyeri* habitat

A total of 204.85 ha of *V. geyeri* habitat was included in the current survey of 19 sites, with 168.34 ha having some suitability for supporting the snail (Suboptimal-Unsuitable or better) and 36.51 ha considered Unsuitable (Table 20).

Table 20 A breakdown of *Vertigo geyeri* habitat suitability class, in hectares (ha) and percent (%), surveyed during the 2019-2024 monitoring period.

Habitat suitability class	Area (ha)	Area (%)
Optimal	5.18	2.5
Optimal-Suboptimal	74.33	36.3
Suboptimal	33.26	16.2
Suboptimal-Unsuitable	55.57	27.1
Unsuitable	36.51	17.8
TOTAL	204.85	

The total area surveyed has dropped from 206.63 ha in 2013-2018 to 204.85 ha in the current survey, because Polygon C of VgCAM22 Pollardstown Fen was not accessed during the current survey.

The comparison of habitat suitability areas between the current and previous monitoring periods (2013-2018 and 2019-2024) is slightly complicated by the fact that one polygon at VgCAM22 Pollardstown Fen was surveyed in 2019-2024, but not 2013-2018. For this reason, the comparison is based on the figures relating to the surveyed sites and polygons that both monitoring periods have in common (Table 21).

Table 21 A comparison *Vertigo geyeri* habitat suitability area in hectares (ha) between the 2013-2018 and 2019-2024 monitoring periods. Both ecological and interpreted changes are included.

Habitat suitability class	2013-2018	2019-2024	Difference (ha)	Difference (%)
Optimal	9.24	5.18	-4.06	-43.9
Optimal-Suboptimal	62.68	74.33	+11.65	+18.6
Suboptimal	48.15	33.26	-14.89	-30.9
Suboptimal-Unsuitable	38.02	55.09	+17.07	+44.9
Unsuitable	46.28	36.51	-9.77	-21.1
TOTAL	204.37	204.37		

The total area surveyed at the sites during the two monitoring periods remains unchanged, with the exception of one 0.48 ha polygon at VgCAM22 Pollardstown Fen that was surveyed in 2019-2024, but not accessed in 2013-2018. There has been an increase in the area of Optimal-Suboptimal (+18.6%) and Suboptimal-Unsuitable (+44.9%) habitat between the monitoring periods, while a decrease was recorded in the area of Optimal (-43.9%), Suboptimal (-30.9%) and Unsuitable (-21.1%) habitat.

The Habitat status for each site was assessed based mainly on the criteria of Moorkens & Killeen (2011), with occasional additions or amendments by Long & Brophy (2019). Due to the nature of the assessment criteria (detailed in the individual site reports), in some cases the area of suitable habitat may change, but a criterion may still pass or fail as the change in the area of suitable habitat is not sufficient to change the result. The reason for any change in Habitat status at a site level is presented in Table 22.

Monitoring and Condition Assessment of Populations of Vertigo geyeri, Vertigo angustior and Ve rtigo moulinsiana in Ireland

Moorkens, E.A. & Killeen, I.J. Citation: Moorkens, E.A. & Killeen, I.J. (2011)

Monitoring and Condition Assessment of Populations of Vertigo geyeri, Vertigo angustior and Ve rtigo moulinsiana in Ireland.

Irish Wildlife Manuals, No. 55.

National Parks and Wildlife Service, Department of Arts, Heritage and Gaeltacht, Dublin, Ireland

I want to highlight is according to the *'Monitoring and Condition Assessment of Populations of Vertigo Geyeri, Vertigo angustior and Vertigo Moulinsiana in Ireland' Irish Wildlife Manual No 55 - Dept of Arts Heritage and the Gaeltacht.*

Strandhill Airport is where the WWTP is located.

Table 21: Recommended survey schedule 2011-2013 - pg 76
2011 2012 2013
Ballysadare VaCAM20
Strandhill Airport VaCAM21

pg 21 - Survey Methodology

Time of Survey

Survey should take place between **April and October** inclusive in conditions that are not excessively wet, in order to minimise habitat disturbance through trampling. During this period snails are active and some breeding should have occured.

- This means that the Sligo Co. Co.'s AA Screening for the Vertigo Angustior cannot be accepted as it can't be assessed before this time frame - the 'Walk Over' that was done in the Screening is insufficient to screen for Whorl Snail.
-
- This also means that Sligo Co. Co. has intentionally broken their obligation to screen for Whorl Snails having not done a screening for the Looped Trails.
-

- Also, a dense recorded habitat around the perimeter of the Waste Water Treatment Plant - which means that the WWTP did not do the EIA which - means that the legal permission for this build has not been established and cannot be approved retrospectively



Dr Don Cotton

Distinguished Recorder 2012

Dr Don Cotton - National Biodiversity Data Centre (accessed 15/03/2026)

Having spent several years working and studying in the UK Don came to Ireland in 1976 to work as a post-doc in UCD in the field of soil invertebrate ecology. Declan Doogue was a great inspiration and contact around this time and through him Don became involved in the Irish Biogeographical Society and the Dublin Naturalists Field Club. His involvement with the Irish Biogeographical Society was seminal in focussing naturalists like Don to record flora and fauna.

Don's recording career began with woodlice, earthworms and other invertebrates such as Odonata and Orthoptera. He carried out a methodical study of the Odonata of Dublin and Wicklow (1978-1980) and reviewed all Irish Orthoptera records. Records during this period were written on "Cope-Chat punched cards" and in field note books.

In early 1977 Don was acquainted with John Lovatt and became involved in Irish Wildbird Conservancy and in wetland bird counts for Lough Derravaragh, Co Westmeath. He founded a young ornithologists movement and was invited on to the Council of IWC 1979-1981.

In 1981 he moved to Sligo to lecture in Ecology and Geology at the Regional Technical College and played a key role in developing an Hons Degree Course in Environmental Science & Technology. At this point his recording focus changed to specialising in all aspects of the natural history of Sligo and Leitrim. During his first 5 years in Sligo he was involved in special surveys of Odonata, Lepidoptera, Orthoptera and Ornithology and established an IWC Sligo Branch doing wetland bird surveys and flora and invertebrate studies. Some of the main recording initiatives he was involved in over the next number of years were:

Winter Atlas of birds for Sligo and Leitrim 1981-1984; Winter Wetlands Survey 1984-1987 for Sligo and Leitrim; Chough Survey; Whooper swan survey and Barnacle goose survey. From 1990 to1992 he carried out a special survey of Harvestmen with Martin Cawley

In 1995 Don established a computer database for his species records which was one of the first PC based amateur databases to be established in Ireland. He extended the computerisation of his records in 2000 with a references and habitats database for Sligo and Leitrim.

Don was founder member of the Irish Whale & Dolphin Group and its first Chairman in 1990. He was the Botanical Society of British Isles (BSBI) County Recorder for Leitrim (1997-2012) and

nominally for Sligo (1997-2001) during the years of the 'New Atlas of the British and Irish Flora'. He is the current BSBI County Recorder for Sligo.

)n served on the Board and the Editorial Committee of the Irish Naturalists' Journal and also served 3 years as Chairman of INJ. He currently serves on the following committees: Praeger Committee (RIA); Sligo Heritage Forum (Sligo Co.Co.); Wildlife Committee (Heritage Council).

Sligo Champion/ Irish Independent

Don to receive national honour for wildlife work

Tue 20 Nov 2012 at 10:25

FOR 30 years he has documented Sligo's wildlife habitats.

Former Environmental Science lecturer at IT Sligo, Don Cotton, is now to be honoured for his work.

Don, pictured, will receive the National ' Distinguished Recorder' award at the Royal Irish Academy on Thursday.

He is being presented with the award for a total of 35 years biological recording, 30 of which were in Sligo and Leitrim.

Don said: "Sometimes the people living in Sligo take their environment for granted because they see it every day. However, tourists appreciate the landscapes and many visitors recognise the flowers and wild animals and wonder why we aren't doing more to protect what we have.

"We are in danger of losing this biological diversity through lack of knowledge and understanding and that is why I have spent over 30 years of my life scientifically recording the habitats and living creatures around us in the hope that special places for wildlife can be conserved for future generations."

Narrow-mouthed intruder could bring sports facilities to a crawl

MICHAEL MORAN

Sligo Champion, Irish Independent, Wed 15 Jul 2009 at 16:17

Vertigo Angustior is holding up plans for the development of sport and recreational facilities at Strandhill. However, it's not a case of a conscientious objector â?" rather a protected species of snail!

The narrow-mouthed whorl snail-included in an EC Habitats Directive-has been discovered on part of lands zoned for recreational development as part of the Strandhill Local Area Plan.

Officials of Sligo County Council are negotiating the redesign of this part of the project in a bid to move it forward.

Director of Services Rita McNulty told Councillors that while a site had initially been identified and plans drawn up for a playing pitch, community building and a playground, surveys conducted by the National Parks and Wildlife service on behalf of the Council had found that it went through the path of the protected species of snail.

She later informed councillors that the council had met with the relevant department and were attempting to redesign the scheme so that there would be no problems from an environmental point of view. These discussions were ongoing with no outcome as of yet, Ms. McNulty added.

In proposing a three year extension to the Strandhill Plan, as recommended in a report from County Manager, Mr. Hubert Kearns, Councillor Jim McGarry referred to the rare snail.

"One concern I have is that the current plan has not achieved its potential in terms of community facilities.

"A major stumbling block in the development of these sporting amenities was the discovery of the protected species, Vertigo Angustior, or narrow mouthed whorl snail, on the lands the County Council had zoned for recreational development," he said.

He added that Ms. McNulty, was doing great work to pinpoint what parts of this land was actually available for development.

"If it turns out that there is not enough land available to us for development of recreational and sporting facilities, then I would be urging us as a council to look at different sites for development," Clr. McGarry maintained.

Environment

A decade after a tiny snail halted work on a Co Sligo water treatment plant, Uisce Éireann to bring it back

Whorl snail population will be revived in its original home near Lake Talt



Uisce Éireann (formerly Irish Water) has become the Vertigo Geyeri snail unlikely saviour

Mark Hilliard

Mon Aug 21 2023 - 06:00•4 MIN READ

Almost a decade after a tiny, unseen snail halted urgent public health works on a water treatment plant in the west of Ireland, Uisce Éireann is about to bring it back.

It could be described as snail's pace conservation but Vertigo geyeri, more commonly the whorl snail, is likely to return to its natural habitat near Lough Talt in Co Sligo, two decades after it was last spotted.

Uisce Éireann (formerly Irish Water) has become its unlikely saviour. The state-owned company struck an unprecedented planning arrangement allowing its treatment plant to be upgraded in exchange for safeguarding the habitat and slowly reintroducing the species.

All going well, the whorl snail should be back in its natural habitat by early 2028 – 21 years after it was last sighted and 13 years after an initial planning application to upgrade the Lough Talt treatment plant was first rejected.

In 2015, the Environmental Protection Agency placed the Lough Talt plant on its remedial action list because it was not sufficiently protecting against cryptosporidium or carcinogenic trihalomethanes, both having the potential to cause serious risks to public health.

Three years later, the entire Tubbercurry area serviced by the plant, amounting to some 13,000 people, was placed on a boil water notice following the detection of cryptosporidium on routine testing.

"It was an extraordinarily bad public health situation because the cryptosporidium situation was going to be on repeat until the treatment plant was updated," explained Olwyn James, senior planning manager at Uisce Éireann, who has been involved in continuing efforts to balance the needs of thousands of water customers against the need to preserve the habitat of the whorl snail.

Cryptosporidium is a tiny parasite found in human and animal waste which, if ingested, can cause fever, stomach upset and diarrhoea. In severe cases, it can cause dehydration and death.

It is not an uncommon threat. According to a 2021 study at the Technological University of Dublin, infections have been recorded in 58 per cent of electoral areas and in all 26 counties.



Uisce Eireann's water treatment plant at Lough Talt, Co Sligo, is the natural habitat of the whorl snail

"When it's a public health issue like that, that is an instant priority for an organisation like Irish Water," explained Ms James.

Aware of the urgency, the utility applied for planning permission to Sligo County Council in 2015 to upgrade the Lough Talt facility but because it could not sufficiently demonstrate the works would not impact the whorl snail habitat, a European special area of conservation (SAC) at the adjoining Lough Hoe Bog, this was rejected, as was an appeal to An Bord Pleanála in 2017.

Separate analysis conducted by Uisce Éireann found the treatment plant would, in fact, cause drought conditions at the bog. For 95 days of the year, it would have to reduce water extraction by half in order to not pose a threat.

"Any fluctuation in the sogginess means the snail will die," Ms James said. "The snail has been missing in action since 2007 but the conservation objective was to restore the habitat to make it a constant level of contentedness for the snail [so that] should the snail return, it would thrive."

Hope eventually emerged in the form of an "imperative reasons of overriding public interest" clause that can assist a planning application with the promise of compensation measures. Given the urgent health concerns, and the fact an alternative public water source lay 30 to 40 kilometres away, this offered a potential solution but could only be decided by Sligo County Council.

"If we could bring the snail back, that would compensate for the snail being lost in the past. And then, we had to figure out a way to do that because it hasn't been done before," said Ms James.

Restoration of Whorl snail habitat

1972: Construction of the Lough Talt water treatment plant to supply Tubbercurry, Co Sligo and surrounding communities.

2007: Last known sighting of the whorl snail (vertigo geyeri).

2014: Establishment of Irish Water (now Uisce Eireann).

2015: Lough Talt placed on the Environmental Protection Agency's remedial action list due to concerns over cryptosporidium.

2015: Planning application to upgrade treatment facilities rejected by Sligo County Council due to European Special Area of Conservation (SAC) status, regarding whorl snail habitat.

2017: An Bord Pleanala rejects Uisce Eireann appeal.

2018: Renewed application sent to Sligo with hopes of exemption and habitat restoration.

2020: Completion of new treatment plant.

2026: Anticipated placement of "test" snail species, closely related to whorl snail.

2028: Anticipated reintroduction of whorl snail.

All going well, the whorl snail should be back in its natural habitat by early 2028. Illustration: Paul Scott

.th the help of mollusc expert Dr Evelyn Moorkens, a solution was designed that would see irrigation of the SAC area maintain suitable conditions, even with normal water extraction activity.

A revised planning application was granted. In 2020, Uisce Éireann began operating its upgraded treatment facility some five years after it first began attempting to address the problem.

Next year, a "test" snail closely related to Vertigo geyeri that is slightly more robust will be placed on site and monitored to see how it copes in the irrigated environment. Should that prove successful, as anticipated, the whorl snail population will be revived in its original home. Lough Talt is also to be replaced by another public water source.

A happy ending for the snail but possibly not the end of the story. With a shortage of the mollusc experts required to navigate similar conservation challenges, Uisce Éireann has now entered into a funding programme with Trinity College Dublin to produce more.

[Almost 500,000 people being served by 'at risk' water supplies, EPA warnsOpens in new window]

"There are other snails and other projects and it's likely that this is going to happen [again]."

- Join The Irish Times on WhatsApp and stay up to date
- Sign up for push alerts to get the best breaking news, analysis and comment delivered directly to your phone
- Listen to In The News podcast daily for a deep dive on the stories that matter



Mark Hilliard

Mark Hilliard is a reporter with The Irish Times

Opens in new window

While a specific 2013 construction report by

Dr. Evelyn Moorkens for the Strandhill Wastewater Treatment Plant (WWTP) is not publicly lexed as a standalone document, Dr. Moorkens is the leading expert who famously designed the conservation solution for the **Narrow-mouthed Whorl Snail** (*Vertigo angustior*) at that site.

Context of the Strandhill Report

In 2013, construction on the Strandhill WWTP was halted due to the discovery of *Vertigo angustior*. Dr. Moorkens was commissioned to address this challenge, leading to several key outputs:

- **Conservation Solution:** Dr. Moorkens designed a specialized **irrigation system** for the Special Area of Conservation (SAC) to maintain the precise hydrological conditions the snails require, allowing construction to eventually proceed.
- **Revised Planning:** Her findings and mitigation strategies were integrated into the revised planning application for the facility, which was eventually granted.
- **National Baseline (2011):** Prior to the 2013 construction halt, she co-authored the foundational Monitoring and Condition Assessment of Populations of Vertigo angustior in Ireland (Irish Wildlife Manual No. 55), which establishes the national monitoring standards used for the Strandhill site.

How to Access the 2013 Site-Specific Report

Since site-specific ecological reports for infrastructure projects are often held in planning or license files, you can find the specific 2013 documentation through:

1. **Sligo County Council Planning Office:** Search their Planning Online portal using the original WWTP application references.
2. **Environmental Protection Agency (EPA):** The EPA License Search for the Strandhill WWTP (License Reg: D0107-01) contains technical summaries and Natura Impact Statements (NIS) that frequently include Dr. Moorkens' expert appendices.
3. **Uisce Éireann (formerly Irish Water):** As the current operator of the facility, their project archive for the "Strandhill Wastewater Treatment Plant Upgrade" includes the environmental assessments conducted after the 2013 work stoppage.

The specific ecological reports for public infrastructure are summarized in planning documents, the full 2013 report by Dr. Evelyn Moorkens may not be "publicly available" as a standalone PDF for several common reasons:

- **Rare Species Protection:** Under the Access to Information on the Environment (AIE) Regulations, public bodies can limit access to information that could harm the environment, such as the exact **GPS locations of rare species** like

Vertigo angustior

.

- **Embedded in Larger Files:** These reports are often submitted as **appendices** to a larger Natura Impact Statement (NIS) or Environmental Impact Assessment Report

(EIAR). You may need to search for the parent document rather than the specific report title.

- **Administrative Transition:** In 2013, local authorities like Sligo County Council managed these projects before responsibility transferred to Uisce Éireann (formerly Irish Water) in 2014. Some older digital records may not have been fully migrated to newer public-facing portals.
- **Copyright & Intellectual Property:** Technical reports commissioned for specific planning applications are the property of the applicant or the consultant. While they are part of the public planning file, they aren't always distributed freely online like

- Uisce Eireann.
- Dept of Housing Heritage & Local Gov

Excerpts

Project Splitting Part 8.

Water concerns Uisce Eireann

- Aine Nic Amhlaoibh

Chief Executive's Report to the Members of Sligo County Council

as required by Section 179 (3), Part XI of the Planning and Development Act 2000 (as amended) in relation to the proposal to carry out public realm enhancement works at Strandhill village, County Sligo.



Part 8 2025 Strandhill Shore Rd

Ordinary meeting of Sligo County Council
7 July 2025 – Agenda Item no.X

An Roinn Forbartha Tuaithe agus Pobail
Department of Rural and Community Development
An Chláir um Athghiniúint agus Forbairt Tuaithe
Rural Regeneration and Development Fund
2040

Excerpts

Project Updates

Contents

1. Chief Executives report.....1

Appendices

A. Site Location Map and Site Layout Plan

B. List of individuals or organisations who made submissions or observations with respect to the proposed development.

C. Detailed summaries of each submission received from individuals and organisations along with the response of the Chief Executive

D. Memo from the Planning Section

E. Screening determinations

1.0 Introduction

This report is the Chief Executive's Report on the proposed Local Authority development at Strandhill involving the public realm enhancement of Shore Road and the Shore Front in the coastal village of Strandhill. Section 179(3) of the Planning & Development Act 2000 (as amended) requires that the Chief Executive submits a report to the members of the Council on the proposed development for their consideration.

The report should describe the nature and extent of the proposed development (including an appropriate plan of the development and appropriate map of the relevant area) and should also:

a) *evaluate whether or not the proposed development would be consistent with the proper planning and sustainable development of the area to which the development relates, having regard to the provisions of the development plan and giving the reasons and the considerations for the evaluation,*

b) *include the screening determination on why an environmental impact assessment is not required*

c) *list the persons or bodies who made submissions or observations with respect to the proposed development,*

d) *summarise the issues, with respect to the proper planning and sustainable development of the area in which the proposed development would be situated, raised in any such submissions or observations, and give the response of the chief executive,*

e) *recommend whether or not the proposed development should be proceeded with as proposed, or as varied or modified as recommended in the report, or should not be proceeded with, as the case may be.*

Following the consideration of the Chief Executive's report, the proposed development may be carried out as recommended in the report, unless the local authority, by resolution, decides to vary or modify the development, otherwise than as recommended in the CE report, or decides not to proceed with the development.

1.1 Project vision and aims

The Shore Front in Strandhill is a special place, boasting spectacular views of the wide Atlantic and offering visitors a unique proximity and exposure to the sound and sight of crashing waves. Over the past three decades, Strandhill has seen a surge in popularity, with thriving local businesses, a booming surf scene, and a growing demand for outdoor leisure and recreation.

But as the village has thrived, so too has the pressure on its public spaces—especially on the Shore Front. Sligo County Council has tried to facilitate the ever-increasing demand for space by increasing car parking and widening footpaths. However, it is clear, on a hot summer's day, there will never be enough parking spaces in Strandhill.

In the spirit of the national priorities of compact growth, active travel, town centre first and climate resilience as well as the increased focus on high quality public realm, Sligo County Council identified the Shore Front in Strandhill as a public area that needed a 're-imagining', a place where people come first.

The Shore Front has become a large car park dominated by both moving and stationary vehicles and the pedestrian-only space is limited. It can be a congested and confusing place on busy days especially for parents with small children and those with mobility issues who just want to walk the 'Promenade'. The sea-side footpath from kerb to wall may be 3m wide, but in reality those who walk might only have 1.5m when overhanging vehicles, street furniture and sitting people are taken into account. The public footpaths along the Shore Road are also restricted in width for pedestrians who often have to walk on the carriageway to make space for others.

Landscape architects were tasked with transforming the car park into a genuine Promenade while still retaining adequate spaces for those who really need them. Retaining the tradition of older people sitting in their cars, taking in the view, was an important aspect of the scheme as was increasing the safety and comfort levels of pedestrians while they are enjoying all that Strandhill has to offer. Visitors and locals should be able to surf, walk, dine, play, people-watch and socialise in comfort.

In order to realise this vision, people must be encouraged to use active travel or public transport to reach the Shore Front. Those who choose to drive and are able bodied should park in the Upper Car Park leaving the Shore Front spaces for drivers who really need them. This will require a behavioural change, but it is a change in the interests of the common good, a change that preserves the charm of the village and aligns with national goals for sustainable living. This will ensure that the village remains a 'go-to' place to live and visit for future generations.

Key goals:

- **Make walking safer and easier:** Reduce vehicle speeds and improve pedestrian links between Shore Road and the Promenade.
- **Create more space for people:** Expand and upgrade the pedestrian-only space along the Shore Front for use by locals, visitors, families, and older people.
- **Improve navigation and aesthetics:** Use high-quality materials, coordinated street furniture, and clear signage to enhance the flow of people and appearance.
- **Support local tourism:** Boost the village's appeal and capacity as a tourist destination.
- **Build climate resilience:** Incorporate Sustainable Drainage Systems (SuDS) and biodiverse coastal planting to respond to environmental challenges.

1.2 Source of Funding – Rural Regeneration and Development Fund (RRDF)

The project so far has been funded by the Rural Regeneration Development Fund. This is a fund administered by the Department of Rural and Community Development which supports projects that have the potential to revitalise rural towns and villages in line with the Town Centre First Policy. Projects should be focus on sustainable regeneration that will drive greater economic activity and footfall. Funded schemes should provide the necessary facilities and infrastructure in settlements, which will assist in attracting people to live, work and invest in rural areas.

This Part 8 process represents the culmination of the Preliminary Design Phase of the project. If the Part 8 is approved by the Members, Sligo County Council will apply for funding once again to the Department to carry out the detailed design for the project and ultimately to construct the scheme. During this stage there will be further consultation with the general public and with the key stakeholders and residents of Strandhill.

2.0 Public Consultation

Notice of the proposed development at Strandhill was advertised in the Sligo Weekender, on Thursday 27 February 2025 and plans of the proposed development were placed on public display for a four week period until the 27 March 2025 and were available to view online on the Sligo County Council consultation portal (www.consultsligococo.ie). A total of five site notices were erected on site. Submissions or observations could be made with respect to the development on or before 4pm 11 April 2025, either in writing or via the consultation portal. In total, submissions were accepted for a 6 week period. Notice was also given to prescribed bodes in accordance with Article 81 of Part 8 of the Planning and Development Regulations 2001 (as amended).

3.0 The nature and extent of the proposed development

The proposed works include the following:

Council (upper) Car Park

1. Reconfiguration, resurfacing and relining of the existing car park to create an additional 53 car parking spaces (323 spaces in total - including 17 accessible spaces) and 6 motor bike spaces.
2. Provision of new bus stop with enhanced seating and shelter for customers
3. Planting of ornamental shrubs and trees suitable for a coastal environment to soften the appearance of the car park from Shore Road
4. Provision of new road signage

Shore Road

1. The narrowing of Shore Road just beyond the Council car park to 3m for a defined section and the provision of a 'courtesy crossing' in order to encourage drivers to use the Council car park rather than continue down Shore Road to the Promenade. These measures mark the beginning of the traffic calmed and pedestrian priority zone
2. Reduction in the carriageway width of Shore Road to 5m and construction of wider footpaths for an enhanced, safer pedestrian experience
3. Repaving of the footpaths and carriageway in high quality materials suitable for the coastal location
4. Installation of new street furniture (benches and seating bollards to control 'ad hoc' vehicular parking), new wayfinding signage and high quality lighting columns

The Promenade (Shore Front)

1. Widening of the existing footpaths and reduction in width of the carriageway to create a high quality civic space and to slow down traffic
2. Introduction of maritime planting to function as rain gardens
3. Resurfacing of the promenade and roadway in high quality in-situ concrete paving to tie into the local materials and ensure durability from winter storms.
4. Provision of 42 no. car parking spaces on the Shore Front comprising 10 no. accessible spaces and 32 no. standard spaces, some of which may be short-term spaces and some of which may be age-friendly spaces)
5. Resurfacing and widening of the eastern footpath outside local businesses and the National Surf Centre and provision of 2 new loading bays serving these local businesses
6. Creation of a granite seating plinth at the northern end of the promenade, allowing for formal and informal seating
7. Relocation of the Cannon further up the Promenade, 57m to the south west to enhance its setting and to create a focal point on the new enhanced Promenade

The proposed works do not include any changes to the boundary wall which separates the existing promenade from the natural coastline. The works also avoid contact with the existing rock armour.

Appendix A provides a site location map and site layout plan of the project area. See the link below to plans and particulars of the scheme as available on the County Sligo Consultation Portal https://consult.sligococo.ie/en/consultation/strandhill-public-realm-enhancement

4.0 Referrals

4.1 Prescribed bodies

In accordance with the requirements of the Planning & Development Regulations 2001 (as amended) Part 8, Article 82(3), copies of the advertised documents were issued to the following prescribed bodies:

- Development Application Unit of the Department of Housing Local Government and Heritage - National Parks and Wildlife Services and National Monuments Services
- Uisce Éireann
- Failte Ireland
- An Taisce

Responses were received from the DAU and from Uisce Éireann. Please refer to Section 5 of this report for summaries of same and the Chief Executive's response.

4.2 Internal referrals

Copies of the advertised documents were also issued to the following sections within Sligo County Council:

- Planning / Roads and Infrastructure / Environment / Parks / Fire Authority / Town Regeneration Officer / Heritage / Biodiversity

A total of 3 responses were received from internal sections within Sligo County Council as follows:

Section	Comment
Environment Section	It is important to ensure that all construction waste associated with the development is disposed of in accordance with the requirements of national waste legislation.
Planning Section	The proposed development would be consistent with the policies and objectives of the CDP and with the proper planning and sustainable development of the area.
Area Office (Roads and Infrastructure)	No objections subject to the delivery of a Stage 2 Road Safety Audit. The Area Office looks forward to being involved in the detailed design should the Part 8 be approved and RRDF funding granted.

The report from the Environment Section contains standard comments in relation to waste disposal and the preparation of a construction and demolition waste management plan which will be prepared at the detailed design phase of the project.

6.0 Summary of issues raised in this public consultation

A total of 99 submissions were received and uploaded to the Sligo County Council online consultation platform.

Two submissions were received from prescribed bodies – DAU of the Department of Housing Local Government and Heritage (DHLGH) and Uisce Éireann .

Four submissions were received from public bodies/community organisations including the Age Friendly Alliance, Ireland Cycling Campaign, Sligo Cycling Campaign and the Strandhill Community Development Association.

Two submissions were received after the closing date as advertised on the public notices and the consultation portal. These are not considered in this report nor are they uploaded on the consultation portal.

Please refer to Appendix B for a full list of individuals and organisations who made submissions or observations in accordance with Planning & Development Act 2000 (as amended) Section 179 (3)(iii).

The content of the 99 submissions received can be categorised as follows:

No. of submissions which express support for the scheme including those which support the scheme and make suggestions for improvement (27)	49
No. of submissions which express concerns or object to the scheme	38
No. of submissions which neither express support or opposition to the scheme but raise other issues relating to Strandhill or to private property in Strandhill	6
No. of submissions which object to the scheme on the grounds of the relocation of the Cannon only	3
Submissions which mention public toilets only	1
Prescribed bodies	2
TOTAL	**99**

This section will summarise the submissions in terms of the key issues raised. The four issues raised most often were as follows:

(1) the reduction of car parking on the Shore Front
(2) the relocation of the Cannon
(3) the lack of public toilets in Strandhill
(4) coastal erosion

The Chief Executive's response to these four issues will be provided in this section.

Please see Appendix C for a summary of each submission and the response to same from the Chief Executive.

6.1 Reduction in car parking spaces

The majority of the submissions objecting or expressing concerns about the scheme cite the reduction of car parking spaces at the Shore Front as their main issue. Many of these objections are based on the perceived impacts for older adults and individuals with mobility impairments. Other submissions argue that the reduction in car parking spaces on the Shore Front will be bad for the village, change the atmosphere of the Shore Front and/or negatively affect local businesses.

Under the proposed scheme, 42 spaces will be retained on the Shore Front. The nearby Upper Car Park, which currently offers in excess of 250 car parking spaces is regularly used by visitors throughout the year, including during winter months. It is anticipated that these visitors will continue to do so.

A recent survey conducted over a sunny May weekend (10 and 11 May 2025) revealed that 18% of Shore Front spaces were occupied by the same vehicle for the entirety of Saturday. The percentage of long-term parking (over 4 hours) increased in the afternoon to 25% of existing car parking spaces. These findings highlight a significant issue with long term parking at the Shore Front. Addressing this behaviour would increase availability for those with legitimate access needs.

The proposed scheme is designed to encourage able bodied people to use the main Council Car Park and leave the Shore Front spaces for those who really need them. It is acknowledged that this will require a behavioural change amongst able bodied visitors and locals, who should use the Main Council car park rather than drive down to the Shore Front to look for a space. As evidenced by the recent survey referred to above, behavioural change will also be required on the part of people, possibly local workers, who park all day on the Shore Front. It is also hoped that visitors can be encouraged to use public transport and locals to cycle or walk to the Promenade.

6.2 The relocation of the Cannon

The relocation of the Cannon was raised in 28 submissions. Many submissions describe the importance of the Cannon to the people of Strandhill. All but two of these submissions (26 no. in total) object to or query its relocation.

The importance of the Cannon to the identity of Strandhill is acknowledged. The Cannon is proposed to be relocated circa 60m to the south. It is currently located c.6m from the existing bandstand structure and it was a considered decision to relocate the Cannon in order to emphasise its significance and improve pedestrian flow in the area. The idea is to enhance both its setting and the overall attractiveness of the Promenade by providing items of interest along the Shore Front.

It is not considered that this will change the character of Strandhill nor will it change the character of the Cannon itself. The Cultural Heritage Impact Assessment Report also concludes that moving the Cannon will have no impact on the character of the structure.

However, it is considered that the retention of the Cannon in its current location will not materially affect the proposed scheme with regard to realising its overall aspirations.

6.3 Public toilet provision in Strandhill

There were 27 submissions received calling for the provision of public toilets in Strandhill, with many suggesting that they should be provided in or on the grounds of the National Surf Centre.

The issue of public toilets in Strandhill is important and must be addressed by Sligo County Council. However, this scheme is a public realm enhancement project and the provision of public toilet facilities is not considered within the remit of the original application submitted to the RRDF for funding.

6.4 Coastal erosion in Strandhill

The issue of coastal erosion and in particular coastal erosion protection measures is a pertinent issue and was raised in 18 of the submissions received.

A 'Coastal erosion and flood risk management study' was prepared in 2024 for Strandhill. The report details the ongoing coastal erosion process and proposes two options for a coastal protection scheme. Following this plan, an application was lodged for €800,000 in funding to carry out initial protection measures was made to the Office of Public Works. In late March 2025, Sligo County Council received almost €30,000 to fund further studies on coastal erosion in Strandhill. This funding, sanctioned by the Office of Public Works, will support enhanced analysis and data collection to inform and strengthen the case for a major coastal erosion protection scheme and flood mitigation works in the area.

While it is acknowledged that coastal protection measures are critical for Strandhill, it does not follow that no other enhancements of Strandhill should progress. Enhancement of the public realm of Shore Road and Shore Front and coastal protection measures are not mutually exclusive and can occur in tandem or independently of each other from different funding sources. Coastal protection measures would not be funded by the RRDF.

6.5 Positive suggestions to be considered further at detailed design stage

Many submissions made suggestions as to how the scheme could be improved to better meet the needs of the local and wider community. Many of these suggestions are considered worthy of further consideration during the detailed design phase of the project. The following is a list of the suggestions that the Chief Executive confirms will be considered at the detailed design phase of the project:

1. The provision of electronic signage at the Upper Car Park indicating availability of spaces at the Shore Front
2. The use of the loading bays as short-term car parking spaces outside agreed loading times
3. The use of angled car parking spaces in lieu of perpendicular spaces and the inclusion of age-friendly parking spaces on the Shore Front
4. Provision of disabled parking spaces on the business side of the Promenade
5. Removal of the height barrier at the upper car park
6. Parking spaces accommodating campervans and mini-buses in the upper car park
7. Motor bike parking located near the main entrance
8. Provision of a disabled parking bay in lieu of one of the proposed loading bays
9. Consider the option of widening the southern footpath only on Shore Road
10. Give priority to cars entering and exiting the Upper Car Park over the lower half of Shore Road
11. Provision of moveable picnic benches, sheltered seating, solar powered public lighting, outdoor gym equipment, public art
12. Use of warm white LED bulbs in the public lighting
13. Replace the existing wall capping to better integrate the new design with the existing wall
14. Consider the type of bollards used on Shore Road in the context of annual events such as the Warriors Run
15. Preparation of a detailed Construction Management Plan including measures to minimise disruption to existing businesses and maintain access to the shoreline for walkers / surfers during the construction phase

7.0 Planning and policy context

The Council's attention is drawn to the Planning Report in **Appendix D** – attached, which has been endorsed by the Senior Executive Planner for Sligo County Council.

7.1 Consistency with the Zoning / Planning Context:

Sligo County Council seeks to ensure that the County's towns and villages are developed in a manner which retains and enhances their identity and character and creates pleasant and attractive places (Chapter 10 County Sligo Development Plan 2024-2030).

The scheme directly aligns with **Policy 19.3.4 Mixed Use zones - Shore Road and Promenade** and **Policy P-PR-1** as set out in the Strandhill Village Plan.

Having regard to the above, the nature of the development and the zoning and policies in the CDP, it is considered that the proposed development is consistent with the zoning objectives for the area.

7.2 The development would not adversely impact on the heritage value of the area:

Archaeology: The proposal has been the subject of an Archaeological Impact Assessment carried out by an archaeologist licensed by the Department of Housing, Local Government and Heritage. The report concludes that while the proposal is unlikely to impinge on the recorded archaeological sites and monuments, archaeological monitoring of ground works should be undertaken during the construction phase of the development. The DHLGH have concurred with this conclusion.

Built heritage: In the interests of urban design and enhancing the Promenade, it is proposed to relocate the Cannon to a point 57m to the west along the Promenade. The Cannon is a protected structure in the current Record of Protected Structure for County Sligo (RPS no. 102).

It is considered that relocating the Cannon 57m west along the Promenade does not constitute a change to the setting or character of this protected structure and this opinion is reflected in the Cultural Heritage Impact Assessment Report prepared by Moore Archaeological and Environmental Services LTD.

The DHLGH have not commented on the proposed relocation of the Cannon.

The issue of compliance with the Habitats Directive and impacts on Natura 2000 sites is addressed in **Section 8** of this Report.

7.3 The development will not adversely impact upon visual amenity:

The coastline defining the village is classified as a visually vulnerable area in the CDP. The CDP seeks to protect the physical landscape, visual and scenic character of County Sligo and seeks to preserve the County's landscape character (**P-LCP-1**). **P-LCP-2** seeks to discourage any developments that would be detrimental to the unique visual character of designated Visually Vulnerable Areas.

The proposed development proposes a reconfiguration of the Shore Road and the Shore Front in order to make more space for pedestrians. The proposal involves repaving of roads and footpaths and more landscaping and street furniture, in particular seating. It is anticipated that the proposal will significantly improve the visual amenity of the area.

There are no concerns regarding the visual impact of the proposed development.

7.4 The development would be consistent with traffic, transport and mobility policies:

Section 19.3.5 of the Strandhill village plan for Strandhill (as contained in the CDP 2024-2030) sets out the Council's objectives relating to transport, circulation and parking for Strandhill.

Section 19.3.5 D: *Support the implementation of traffic-related schemes within the village, including:*

- realignment and upgrading of road junctions and footpaths.

- provision of new footpaths and cycle lanes;

- traffic calming measures and road drainage;

- road signage from the Knocknarea walk/Sligo Rugby Club on the R-292 to the junction with Buenos Aires Drive;

- road signage from the R-277/R-292 roundabout extending to the Promenade and to the Airport Road.

Section 19.3.5 E: *Reconfigure the Council Car Park on Shore Road and increase the number of car parking spaces available to facilitate the proposed public realm enhancement works at the Promenade.*

The proposed development is consistent with these objectives.

Having regard to the above it is considered that the proposed development would be in accordance with the traffic, transport and mobility policies of the Development Plan.

The Roads Section have been closely involved in the development of this scheme. The scheme will provide much needed traffic calming, traffic management and will ultimately improve the environment for pedestrians, vulnerable road users and for all visitors to Strandhill.

7.5 The development would not adversely impact on residential amenity

The proposed upgrading to the public realm of Shore Road (which contains several residential dwellings) is expected to have a positive impact on residential amenity by improving the setting of people's homes and generally having a beneficial impact on the prosperity of the village.

Unavoidably, there will be some inconvenience caused during the construction phase of the development though this will be short lived and appropriately managed to limit impact.

Having regard to the above, it is not considered that the proposed development will have any long term adverse impacts on residential amenity.

8.0 Environmental Assessments

8.1 Requirements of the Habitats Directive:

A Stage 1 Screening Appropriate Assessment was completed by LUC – the consultants overseeing this project. The AA Screening Report was included in the documents that went on public display as part of the application.

A screening report provides the information required by Sligo County Council to determine the potential significant effect of the proposal on the neighbouring Natura 2000 sites, potential impact on the integrity of the site and facilitates a decision by the Council in compliance with Article 6 of the EU Habitats Directive and regulation 42 of the 2011 Habitats Regulations.

The Appropriate Assessment Screening Report in assessing the potential impact of the development on its own or in combination with other developments has determined that the proposed development will not have an impact on any Natura 2000 sites and has therefore determined that a Stage 2 Appropriate Assessment is NOT required in the case of this development.

Sligo County Council has had regard to this Screening Report and has determined that the proposed development is not likely to have potential impacts, whether direct, indirect or cumulative/in-combination, which could give rise to adverse effects on the qualifying interests or the conservation objectives of Natura 2000 sites, and that the integrity of these sites will not be affected (See Appendix E for details of the AA determination).

8.2 Requirements of the Environmental Impact Assessment (EIA) Directive:

Sligo County Council has concluded, pursuant to Art.120 of the 2001 Regulations as amended, that an Environmental Impact Assessment is not required for this proposed development.

See Appendix E of this report for the SCC Screening Report and SCC Determination on the need for an Environmental Impact Assessment Report (EIAR) for the proposed public realm enhancement project at Strandhill, County Sligo.

9.0 Chief Executive's recommendation to the members of Sligo County Council

In the words of one respondent to this public consultation, *'this project presents a valuable chance to rethink how we use one of the most beautiful and unique public spaces in Ireland'*.

The vision for the scheme at the outset was to strengthen Strandhill's position as a special coastal destination enjoyed by all members of the local and wider community. The aim was to create a safe, welcoming and attractive environment where a broad range of activities—such as surfing, walking, sitting, playing, people-watching, and dining—could be enjoyed by all. Central to this vision is the prioritisation of people within the public realm, ensuring they feel relaxed, comfortable, and connected to the space and the stunning sea and landscape.

The scheme has been shaped through multiple phases of public consultation and represents a carefully considered compromise that incorporates the views and preferences expressed in hundreds of submissions. Many of the suggestions received in this public consultation have been noted for further exploration should the project advance to the detailed design stage.

The proposed development will preserve what makes Strandhill special while making sure it can be enjoyed safely and sustainably for generations to come. In addition to its local significance, the project aligns with national policy objectives including active travel, climate resilience, compact growth, and the Town Centre First approach.

In accordance with Section 179(3)(b)(v) of the Planning and Development Act 2000 (as amended), and having had regard to:

- the plans and particulars of the scheme;
- the submissions received from the public and prescribed bodies;
- the reports received from internal sections of Sligo County Council;
- the provisions of the Sligo County Development Plan 2024-2030;
- having determined that a Natura 2000 Appropriate Assessment is not required under the European 92/43/EEC (Habitats Directive);
- having determined that Environmental Impact Assessment is not required under the EIA Directive; and
- the proper planning and sustainable development of the area.

It is hereby recommended that the proposed development should proceed as proposed in accordance with the drawings and particulars contained in the Part 8 application which went on public display on 27 February 2025.

NOTE: The members are advised that following the consideration of the Chief Executive's report, the proposed development may be carried out as recommended in the report, unless the local authority, by resolution, decides to vary or modify the development, otherwise than as recommended in the CE report, or decides not to proceed with the development.

Appendix A

Site Location Map and

Site Layout Plan





Appendix B

List of the individuals or organisations who made submissions or observations with respect to the proposed development.

List of individuals and organisations that made submissions or observations on the Part 8 Public Realm Enhancement Scheme for Strandhill, Co.Sligo.

A total of 99 submissions from the general public and prescribed bodies were received from the following individuals and organisations:

No.	Date received	Name	Submitted by (if relevant):
1	01/03/25	Sarah Keating	
2	01/03/25	Kevin Doyle	
3	03/03/25	Gary Byrne	
4	01/03/25	Therese Kelly	
5	01/03/25	Eamonn Leamy	
6	04/03/25	Denise Burns	
7	05/03/25	Paul Barr	
8	05/03/25	Fergal Chambers	
9	05/03/25	Kim Nicholson	
10	06/03/25	Amber O'Doherty	
11	06/03/25	D Cureton	
12	06/03/25	Sinead Mc Goldrick	
13	06/03/25	Dearbhla Gowen	
14	07/03/25	Jane Chambers	
15	07/03/25	Ronan Keane	
16	07/03/25	Gavin Gray	
17	07/03/25	Geraldine Mousa	
18	07/03/25	Eamon Scoby O Grady	
19	08/03/25	Suzanne Togher	
20	08/03/25	Jacqui Carty	
21	08/03/25	Keith Coogan	
22	08/03/25	Paul Reilly	
23	08/03/25	Maura McMorland	
24	10/03/25	John Foy	
25	11/03/25	Jaki Ronan	
26	07/03/25	Lee Hancox	

No.	Date received	Name	Submitted by (if relevant):
27	09/03/25	Sally Siggins	
28	11/03/25	Noel Kennedy	
29	10/03/25	James Glynn	
30	13/03/25	Mary Kilfeather	
31	13/03/25	Vivienne Ryan	
32	13/03/25	Neil and John Byrne	AOK Design Studio
33	14/03/25	Paragon Byrnes LTD	AOK Design Studio
34	14/03/25	Swell Ocean Waves LTD	AOK Design Studio
35	16/03/25	Adrian Kenny	
36	20/03/25	Ciara O'Connell	
37	20/03/25	Carol Farry	
38	20/03/25	Neil Walton	
39	18/03/25	Tony and Mary Moran	
40	17/03/25	Noreen Noonan	
41	21/03/25	AOK Design Studio	Adrian Kenny
42	24/03/25	Shane Neary	
43	22/03/25	Jeanette Carty	
44	27/03/25	Annabel Gilmartin	
45	28/03/25	Emma Barry	
46	28/03/25	CCMD Developments LTD	Robert Kerans Consulting
47	29/03/25	Jan Steiner	
48	29/03/25	Cara Osbourne	
49	31/03/25	Strandhill Community Development Association	David Mc Coy
50	31/03/25	T. Dermody	
51	22/03/25	Ann Kenny	
52	31/03/25	Elisabeth Doran	
53	27/03/25	Department of Housing, Local Government and Heritage	Simon Dolan, Development Applications Unit.
54	1/04/25	The Building Block	
55	1/04/25	Peter Osbourne	
56	2/04/25	Akash Rastogi	
57	2/04/25	Finola Doran	

No.	Date received	Name	Submitted by (if relevant):
58	3/04/25	Peter Tiernan	
59	4/04/25	Dan Walsh	
60	5/04/25	Olive Henry	
61	7/04/25	John Flanagan	
62	7/04/25	Tony Osbourne	
63	2/04/25	Ronan Gilroy	
64	2/04/25	Ann-Marie Hall	
65	08/04/2025	Ruth Hegarty	
66	09/04/2025	Stephen Taylor	
67	09/04/2025	Kieran Mc Grath	
68	09/04/2025	Age Friendly Ireland	Meath County Council
69	11/04/2025	Gemma Woods	
70	10/04/2025	Ronan Marren	
71	11/04/2025	James O'Reilly	
72	11/04/2025	Eilish Mannion	
73	11/04/2025	Tanja Studer	
74	11/04/2025	Charlie Elliot	
75	11/04/2025	Pamela Kivlehan	
76	11/04/2025	Aine Nic Amhlaidh	
77	11/04/2025	David Mead	
78	11/04/2025	Micki Murray	Public Relations Officer of The Warriors Run Committee
79	11/04/2025	Wayne Farry	
80	11/04/2025	Phil Osbourne	
81	11/04/2025	Trevor Farry	
82	11/04/2025	Sligo Cycling Campaign	
83	11/04/2025	Irish Cycling Campaign	Colm Ryder
84	11/04/2025	Noel Raftery	
85	11/04/2025	Johnston Byrne	Lisa Mc Sharry
86	11/04/2025	Joan Swift	
87	11/04/2025	Una l'Estrange	
88	11/04/2025	Helen Dolan	
89	11/04/2025	Strandhill Golf Club	Anthony Skeffington

No.	Date received	Name	Submitted by (if relevant):
90	11/04/2025	Mike Clancy	
91	11/04/2025	Emily Gaine	
92	10/04/2025	Mary Flatley	
93	10/04/2025	Jack O'Doherty	
94	10/04/2025	Kevin Connell	
95	10/04/2025	Ryan Farry	
96	11/04/2025	Patsy Prior	
97	11/04/2025	Enda Eames	
98	11/04/2025	Laura, John, Breda Gaynor	Laura Gaynor
99	01/04/2025	Uisce Eireann	Emmett Hegarty

Submission 99 – Uisce Éireann
Summary of issues
Uisce Éireann note that there are existing sewer and water pipes in the development area that may potentially be impacted by the development and these have not been acknowledged in application documents. Uisce Éireann advise that they cannot permit build over of its assets and the separation distances as per their standard Codes and Practices must be achieved. The report also advises SCC that development proposals should not impact public drinking water sources.
Chief Executive's Response
Uisce Éireann's comments are noted. The proposed development is essentially a public realm enhancement scheme (re-paving and re-configuring of existing hard surfaced areas) designed to prioritise pedestrians over the private car. The majority of the site area is already covered in hard surfacing. A topographical survey of the site was carried out in February 2022 indicating the location of all services underneath the surface. The scheme will not impact any public drinking water sources. Further consultation will take place with Uisce Éireann during the detailed design phase of the project.

5.0 Summaries of issues raised by prescribed bodies and the Chief Executive's Response

Two submissions were received from prescribed bodies – DAU of the Department of Housing Local Government and Heritage (DHLGH) and Uisce Éireann .

DoHPLG

Submission 53 – Department of Housing, Planning and Local Government
Sum maryof issues
Issue 1 – NatureConservation
TheDHLGH recommends the following: 1. The preparation of an Ecological Impact Assessment for the proposed development. 2. The submission of a sensitive Lighting Plan to ensure minimisation of light pollution. 3. The use of porous car park surfaces and hard standings where possible, using loose local substrate or a permeable paving system such as *grasscrete* car parking areas. All car park s and green areas should have sufficient planting of native species to provide ecological be nefit, shade and help to offset the effects of climate change and as a nature- based solution to air and water pollution, while providing food plants for wildlife. 4. The submission of a landscape plan outlining native planting, SUDS and rain garden desig n[xii] and flood risk management.
Issue 2 - Archaeology
The Department concurs with the recommendation as outlined in Section 3 [of the Plannin g report] and recommends that licenced archaeological monitoring be carried out during th ecourse of groundworks.
Chief Executive's Response
The comments from the DHLGH are noted and agreed. All these issues will be ad dressed appropriately at the detailed design phase of the project.

Submission no. 76 – Aine Nic Amhlaidh

Summary of issues

The submission argues that the proposed public realm enhancement works requires an Environmental Impact Assessment for several reasons as detailed in the submission: Proximity to an SAC/ proximity to a National Heritage Monument/ proximity to Marram Grass Dunes/ the presence of a special orchid species and the whorl snail in the area/ sensitivity to coastal erosion.

The submission argues that Sligo County Council is required under EU Habitats and Birds Directive to fully environmentally assess all Development Proposals, this includes assessing for development impact on protected species and assessing the impact on humans.

Other points raised in the submission include:

1. The unprecedented and unsustainable volume of visitors to Strandhill.
2. The Waste Water Treatment Plant in Strandhill:
   a) The WWTP has been using unlicensed waste treatment provider to clear the excess waste two times weekly since it opened in 2021.
   b) The stated Waste Water Capacity as per the County Development plan is misleading.
   c) The submission questions the safety of the water for surfers noting that the '*level of Ammonia being disposed to sea has exceeded the National limit since the opening of this plant*'.
   d) These waters are classified as 'shellfish waters' given the fact that they support the hugely successful Oyster Shell Fish Farm also within 500 m of the waste water treatment plant.
   e) *'The shocking devastation of the salmon population, decimated last summer in Ballisodare bay is an indicator that the sewage and waste being disposed is a risk to human life'*.
3. The proposal ignores the needs of the most vulnerable in our community, the young, the elderly and disabled. The proposal also ignores the views of the residential community in Strandhill.
4. Children need to be able to get to their parent's car quickly. It has been proven that they are at risk of hypothermia given their physiology.
5. It is impossible to monitor surfing children and non-surfing children without shore front access to see the sea.
6. Access to the foreshore cannot be denied to the community according to the law. This proposal denies access and it is '*dishonest and disrespectful to claim that blue sticker parking will suffice*'.
7. Strandhill is not currently listed as having a special tourism function in the current Sligo County Development Plan. '*The removal of this designation has facilitated the council increasing the housing density for residential purposes. The wastewater treatment plant and the environment cannot cope with the influx of tourists*'.
8. *'It would appear that Sligo County Council has a mandate to turn Strandhill into a Tourism Industry without regard for the infrastructure or the needs of the local community, children, families, the elderly, the disabled, those who are most vulnerable*'.
9. This proposal will encourage anti-social behaviour by having '*public areas cut off from a flow of traffic*'.

Aine Nic Amhlaidh recommends that this proposal be refused.

9. To avoid loss of valuable parking spaces, a dedicated and clearly marked area for the beach warden's hut should be incorporated into the plan.
10. The number of public bins currently in place is insufficient during high-traffic periods.
11. The proposal must also consider local businesses to ensure they are not adversely impacted by the changes.

Chief Executive's Response:

The comments from **Pamela Kivlehan** are noted and addressed below:

1. The possibility of converting one of the proposed loading bays into an accessible space will be explored at detailed design stage.
2. The issue of electronic parking signage will be considered further at detailed design stage. The location of the car parking at the **northern end of the Promenade** was initially considered however it was felt that the wider pedestrian spaces should be located in front of the businesses in order to maintain a sense of vitality and vibrancy. Locating a large pedestrian area in the southern end of the Promenade runs the risk of the space being unused for much of the year.
3. The issue of the enforcement of parking spaces is an issue for a potential future management plan for Strandhill.
4. 10 disability spaces are proposed out of a total of 42 spaces. This represents a 24% allocation of spaces designated as disabled parking spaces. The existing car park has 8 accessible spaces representing just 8% of overall parking spaces.

   The Sligo County Development Plan 2024-2030 requires that car parking be provided for the disabled and mobility-impaired in accordance with the document *Building for Everyone 1 – External Environment and approach*, published by the National Disability Authority in 2012. This document recommends a provision of 6% of the total capacity of a car park serving shops, leisure facilities and other building to which the public has access.
5. The current proposal represents a compromise between opposing views expressed during previous consultations on the project. If the 42 spaces are left for people who really need them, then it is considered sufficient to cater for those with mobility impairments who would find the walk too difficult. Increasing the amount of spaces on the Shore Front would significantly reduce the beneficial impacts of the scheme.
6. The issue of campervans overnighting on the Shore Front could be an issue for any potential future Management Plan for Strandhill and is not an issue for this scheme.
7. The provision of a multi storey car park is not considered to be an answer to car parking in Strandhill. There will never be enough spaces. The solution to car parking 'shortages' in Strandhill must involve public transport or active travel measures.
8. Please see **Section 6.3** of this report for the Chief Executive's response to the issue of public toilets.
9. The issue of a beach warden's hut could be examined at detailed design stage.
10. The issue of public bins will be examined further at detailed design stage.
11. The proposal has considered local businesses to ensure they are not adversely impacted by the changes. Parking spaces have been increased in response to their feedback. Two new loading bays have been proposed to assist with deliveries. Public realm enhancements around the world have been shown to have positive impacts on local economies. It is considered that this scheme will have a beneficial impact on all the local businesses at the Shore front and along Shore Road.

Chief Executive's Response:

The comments from **Aine Nic Amhlaidh** are noted and addressed below:

A screening for Environmental Impact Assessment was undertaken with respect to this development. Sligo County Council determined that there is no real likelihood of significant effects on the environment arising from the proposed development and that an Environmental Impact Assessment (EIA) is not required.

1. The proposed scheme will not in itself have any influence on the number of visitors to Strandhill. Its purpose is to improve safety and comfort levels for both visitors and residents of Strandhill.
2. The issue of the Waste Water Treatment Plant in Strandhill is not directly relevant to this project.
3. The current proposal has had careful regard to all the views expressed during several rounds of public consultations on this project. The project as currently proposed presents a reasonable compromise between opposing views and strives to meet the needs of all visitors to and residents of Strandhill.
4. 42 spaces are proposed at the seafront. These spaces should be used by those who need them most. The walk from the Council car park to the Shore Front takes between 2 and 4 minutes depending on where one is parked.
5. As will be apparent from the drawings of the proposed enhancements, access to the foreshore is not being prevented.
6. See above.
7. As per Chapter 19 of the current Sligo County Development Plan, Strandhill is a village designated as having 'special coastal tourism functions'.
8. The aim of the project is to put people first so as to enhance the experience for everyone on Shore Road and on the Shore Front.
9. As will be apparent from the drawings, there are no areas which are '*cut off from a flow of traffic*'. The plans merely provide for wider footpaths throughout the area enabling comfortable two-way pedestrian traffic, comfortable seating and play opportunities for both old and young.

Submission no. 77 – David Mead

Summary of issues

David Mead supports the general idea of the improvement and makes the following suggestions:

1. Given that it is accessible when businesses might be closed, public toilets (preferably with hours like 10am to 8 or 9 pm) should be provided.
2. The provision of sheltered seating with wind break (similar to ones by Cannon which do needs refurbishment) would be welcomed.
3. The iconic Cannon should be kept in-situ *'rather than banishing it to the end. It is a great meeting point'*.
4. A better bus service with a sheltered bus stop is needed. The time between bus services from Sligo Town to Strandhill is too long.

Chief Executive's Response:

The comments from **David Mead** are noted and addressed below:

1. Please refer to **Section 6.3** of this Report for the Chief Executive's response to the issue of public toilets.
2. This idea is noted and has been mentioned in several submissions. This is an issue which will be considered at the detailed design phase of the project.
3. Please refer to **Section 6.2** of this Report for the Chief Executive's response to the issue of the relocation of the Cannon.
4. The frequency of bus services is a matter entirely for the NTA/Bus Eireann and not Sligo County Council.

Sligo County Council
Comhairle Chontae Shligigh

Sligo.

Chief Executive's Report

recommending a Variation of the Sligo County Development Plan 2024-2030

on foot of the Section 28 Guidelines for Planning Authorities titled "*NPF Implementation – Housing Growth Requirements*" (2025), which replace the "*Housing Supply Target Methodology*" (2020)

Sligo County Council
Development
Planning Unit

25 November 2025

Contents

Executive Summary 1

1. Background to the Proposed Variation 3

1.1 Purpose of the Section 28 Housing Growth Requirements Guidelines 3

1.2 Implementation of the new housing targets 3

1.3 Housing capacity of lands zoned in the adopted Sligo CDP 2024-2030 4

1.4 Effects of the Draft Ministerial Direction 4

1.5 Implications for the CDP 5

2. Options considered by the Council 7

2.1 Option 1 – Await Final Direction 7

2.2. Option 2 – Release lands from the Strategic Land Reserve 8

2.3 Option 3 – Amend the Strategic Land Reserve policies 8

2.4 Recommended option 11

3. Next steps towards a Development Plan variation 13

3.1 Recommended contents of the Proposed Variation 13

3.2 Procedure in Accordance with the Planning Act 2000 14

3.3 Estimated timeframe for making the Variation 16

Appendix A – Sites zoned SLR: Infrastructure Assessment and Settlement Capacity Audit scores

Appendix B – Proposed Variation

Executive Summary

On 29 July 2025, the Minister of State for Local Government and Planning, John Cummins, sent a letter to the Chief Executive of Sligo County Council in relation to the Section 28 Guidelines entitled ***"National Planning Framework (NPF) Implementation – Housing Growth Requirements"***, which had been issued one day earlier, on 29 July 2025.

The Minister of State indicated that *"there is now an urgent need for development plans to be updated to reflect the requirements of the recently approved Revised NPF in respect of housing"* and requested that *"planning authorities use all available means to incorporate new housing growth requirements within development plans as quickly as possible"*, prioritising the updating of county development plans to reflect the requirements of the Guidelines.

The purpose of this Chief Executive's Report, as recommended by the Housing Growth Requirements (HGR) Guidelines, is to outline to the Elected Members how it is proposed to secure the objectives of these recent Section 28 Guidelines and of the Revised NPF. The Report contains:

- an outline of the HGR Guidelines and their implications for the current Sligo County Development Plan 2024-2030 (CDP);
- a high-level assessment of the CDP in terms of its compliance with the HGR Guidelines (Core Strategy, Settlement Strategy, Zoning Objectives);
- a quantitative assessment of the adequacy of existing zoned lands to cater for the housing growth requirements;
- a brief description of the available options for implementing the objectives of the HGR Guidelines;
- the Chief Executive's recommendation regarding the preferred manner of addressing the requirements of the Guidelines;
- the recommended contents of a Proposed Variation;
- the estimated timeframe for completing a Development Plan variation.

In essence, it is recommended that Sligo County Council vary its development plan in the following manner:

I. replace the contents of CDP **Section 3.1.3 Consistency with national housing supply targets** with appropriate wording to reflect the replacement of the Housing Supply Target allocation (2020) with the new Housing Growth Requirements target (2025), as per the S. 28 HGR Guidelines.

II. delete **Table 5.2 Adjusted total housing demand in Co. Sligo during the Development Plan period** from CDP Chapter 5 Settlement Strategy (Vol. 1 of the CDP), because it has become redundant as a consequence of the 2025 HGR Guidelines replacing the S. 28 Housing Supply Target Methodology Guidelines (2020).

III. amend the **Strategic Land Reserve Policies** included in **CDP Volume 2, Chapter 10 Urban development principles** to unlock ~~additional housing within the County~~.

IV. **rezone two sites** in accordance with the Planning Authority's determinations on submissions RZLT 25-01 and RZLT 25-02 received in 2025 following public consultation on the Residential Zoned Land Tax (RZLT) draft map.

Copies of this report are to be provided to the Minister for Housing, Local Government and Heritage, and to the Office of the Planning Regulator.

1. Background to the Proposed Variation

1.1. Purpose of the Section 28 "Housing Growth Requirements" Guidelines

The **Housing Growth Requirements (HGR) Guidelines** set out the housing demand scenario to 2040 for each local authority by translating the requirements of the National Planning Framework Revision (2025) into estimated average annual figures.

The new Guidelines replace the *Housing Supply Target Methodology Guidelines* (2020), which previously provided detailed instructions for each local authority's calculations of their respective housing demand.

The HGR Guidelines specify the new annual housing growth requirements in the following manner:

Local Authority	Existing annual 2020 housing requirement (Housing Supply Target)	Adopted Development Plan – annual housing requirement (Housing Supply Target)	**New annual housing growth requirement to 2034**	New annual housing growth requirement to 2040
Sligo	468	672	**672**	585

1.2 Implementation of the new housing targets

The Guidelines contain three "Policy and Objective" statements, requiring the following:

- that the housing growth requirements for each planning authority (set out in Appendix 1 of the Guidelines) are reflected in the relevant City or County Development Plan (*Policy and Objective 1*);
- that 'additional provision' of up to 50% over and above the housing growth requirement for each local authority is reflected within the relevant City or County Development Plan (*Policy and Objective 2*);
- that planning authorities should use all available means to ensure that the objectives of these Guidelines are incorporated within development plans as quickly as possible through the variation of the current adopted development plan (*Policy and Objective 3*).

Each planning authority is required to assess its current development plan, to determine whether the lands zoned for residential use in the plan can accommodate the specified housing targets plus up to 50% additional provision. If this is not the case, the plan needs to be varied.

The assessment should involve the review of:

A. **the Core Strategy** – which sets out the total (county) and settlement-specific population and housing allocations;

B. **the Settlement Strategy** – which indicates where growth should be supported;

C. **the zoning objectives** – e.g. the amount of land zoned for residential and mixed uses (including residential) as well as the location of such lands (which determines the acceptable average residential density), to identify the lands' development potential;

D. **the application of "additional provision"** of up to 50% over and above the housing growth requirement.

*The Guidelines imply that **up to 50% more land should be zoned** in addition to the minimum area necessary to accommodate the housing targets. **'Additional provision'** recognises the fact that, for a*

*variety of reasons, a relatively significant proportion of zoned lands are not activated over the period of a development plan. This application of the "additional provision" requirement involves the identification of **additional** lands suitable for residential zoning.*

The above assessment should determine whether the Development Plan is able to accommodate the required 150% of the housing targets. If this is not the case, the Plan will have to be varied, regardless of the stage in its life.

1.3 Housing capacity of lands zoned in the adopted Sligo CDP 2024-2030

The Core Strategy Table (Section 3.3) in Chapter 3 (Core Strategy Statement), Volume 1 of the CDP (Interim Version, published on 11 November 2024), indicates a total County housing allocation of 4,029 units by 2030, which is equivalent to **671.5 units (672 rounded up)** for each of the six years of the Plan's life.

> **The total CDP annual housing allocation (housing supply target calculated as per the Housing Supply Target Methodology Guidelines) is the same as the "new annual growth requirement to 2034" – 672 units.**

In the adopted Plan, Sligo County Council zoned **205 ha** for residential uses, i.e. **89.7 hectares in addition to the minimum 115.3 hectares** necessary to deliver the housing allocation. In area terms (hectares), the additional zoning represents an "additional provision" of **77.8%,** which is more than the "up to 50%" specified by the Guidelines.

The resulting housing capacity of all lands with housing potential (100% of lands zoned residential and 50% of lands zoned for mixed uses) was calculated at **6,025 units**, equivalent to **1,004 units for each of the 6 years** of the Plan's duration, which is equivalent to **149.4%** of the "new annual growth requirement to 2034".

> **The housing capacity of lands zoned for residential and mixed uses in the adopted CDP ensures an "additional provision" of 49.4% above the new housing growth requirement.**

1.4 Effects of the Draft Ministerial Direction

The County Development Plan 2024-2030 was made by the Members of Sligo County Council on 30 September 2024 with 40 amendments which were contrary to the recommendations of the Office of the Planning Regulator.

The Regulator, after being notified by the Council, informed the Minister that "*the County Development Plan has not been made in a manner consistent with recommendations of the Office*" and recommended the exercise of the Minister's functions "*under the relevant provisions of section 31 of the Act taking such steps as to rectify the matter*".

On 8 November 2024, Alan Dillon, the Minister of State for Local Government and Planning, gave notice of his intention to issue a direction to Sligo County Council to take certain measures regarding the Sligo County Development Plan 2024-2030, consequent to a recommendation made by the Office of the Planning Regulator on 27 October 2024.

The Draft Direction requested Sligo County Council to delete one zoning objective, reverse 21 amendments to zoning and omit one amendment from the text of the adopted County Development Plan.

The Draft Ministerial Direction affects **55.03** hectares of land (11 sites) zoned for residential uses in the following settlements:

- Sligo Town - 5 sites, 43.68 ha in total
- Enniscrone – 3 sites, 2.86 ha in total
- Ballysadare – 2 sites, 4.47 ha in total
- Strandhill – 1 site, 4.02 ha

As a consequence of the Draft Direction, the adopted zoning of the affected sites has not come into effect. In accordance with Section 31(6)(b) of the Planning and Development Act 2000 (as amended), the effective zoning of the sites subject to the Draft Direction is the same as in the previous Development Plan (Sligo CDP 20 2023/24).

This means that some RES and MIX sites revert to their previous SLR designation, others revert to GB (green belt) zoning, and one piece of land reverts to TOU (tourism) zoning, resulting in the following changes:

- **Before** the Draft Direction, the lands zoned in the CDP included 205 ha RES + MIX and 181 ha SLR;
- **After** the Draft Direction, the effective zoning in the CDP includes 150 ha RES + MIX and 218 ha SLR.

At the time of drafting this Report (November 2025), the Minister had not yet issued a Final Direction.

Should the Final Direction require the dezoning of all the affected sites, there would remain an **additional provision of 34.67 ha** of land suitable for housing (89.7 ha excess zoning minus 55.03 ha dezoned lands), representing **30% more than the area required** to deliver the new (equal to existing) annual housing requirement to the end of the Plan's life.

The 34.67 ha would cater for circa 1,213 housing units (considering an average density of 35 units/ha), thus falling short of the 2,016 additional provision which would represent 50% above the target of 4,032 units.

1.5 Implications for the CDP

It is evident that, as a consequence of the Draft Direction, the CDP is not currently able to ensure an additional provision of up to 50% more land zoned, or to cater for 150% of the new housing targets, as required by the HGR Guidelines.

An assessment of the CDP in terms of its compliance with the HGR Guidelines indicates the need for a variation. Below is a summary of this assessment.

1.5.A Core Strategy

The Core Strategy Table (Table 3.2 in Section 3.3 of the CDP) indicates that the adopted Plan set a County housing target/allocation of 4,029 units for the period 2024-2030 (671.5 units per year) and zoned 205 ha for residential use (77.8% excess zoning), with a total capacity of 6,025 units (49.5% above the housing target).

In light of the new housing target of 4,032 units and "additional provision" of zoned land providing capacity for up to 6,048 units, the Core Strategy Table included in the adopted Plan does not require modifications, other than replacing the wording "HST allocation" (Housing Supply Target allocation) with "HGR target" (Housing Growth Requirements target).

Given the ongoing uncertainty regarding the effects of the Final Direction on the total amount of land zoned for residential development, it is not considered opportune to modify the Core Strategy Table by means of a variation. **The Core Strategy Table shall be updated upon completion of the variation procedure and receipt of the Final Ministerial Direction, to reflect accurately the quantum and distribution of housing land throughout the County.**

However, the Core Strategy Statement (Chapter 3) should be amended – through the variation procedure - by replacing the Housing Supply Target allocation with the new Housing Growth Requirements target, to ensure full formal compliance with the S. 28 HGR Guidelines. The relevant part is **Section 3.1.3 Consistency with national housing supply targets. All other figures and statements related to Section 3.1.3 shall be updated as part of the final version of the CDP (after the receipt of the Final Ministerial Direction).**

1.5.B Settlement Strategy

The established settlement structure of County Sligo has remained largely unchanged since the 1990s. The settlement hierarchy, based on the towns' and villages' current roles and functions, does not require any modifications in light ofthe new housing targets.

However, as the method previously recommended for calculating housing demand was effectively abolished when the S. 28 Housing Growth Requirement Guidelines replaced the 2020 Housing Supply Target Methodology Guidelines, **Table 5.2 Adjusted total housing demand in Co. Sligo during the Development Plan period has become redundant and should be deleted from Chapter 5 Settlement Strategy.**

Any figures or statements relating to Table 5.2 shall be updated as part of the final version of the CDP (after the receipt of the Final Ministeria lDirection).

1.5 C Zoning obje ctives

The HGR Guidelines require a review of the amount of land zoned for residential and mixed uses (including residential) as well as the location of such lands (which determines the acceptable average residential density), to identify the lands' development pote ntial.

The Sligo CDP 2024-2030 is just over one year old, so **a full review of the amount and location of residential zoned land is not warranted.** The zoned lands' development potential is explicitly stated in each individual town and village plan, in Volume 2 of the CDP, Chapters 11 to 22 (12 settlement plans in total).

As already mentioned above, the adopted Co re Strategy Table demonstrates that the adopted zoning objectives ensure the provision of sufficient land to meet 149.5% of the new ho using target.

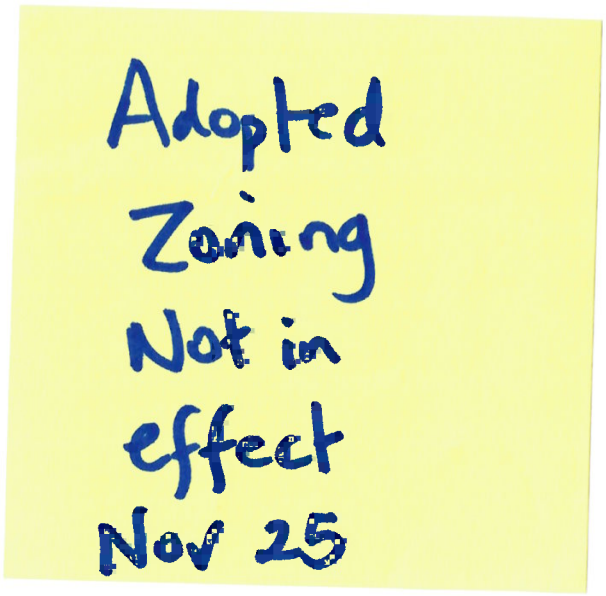
1.5.D Application of "additional provision"

Sligo County Council has long acknowledged the fact that the majority of sites zoned for housing are not being developed during the life of the development plan .The "land hoarding" phenomenon is particularly damaging to the growth of Sligo Town and to its proper functioning as a Regional Growth Centre.

The Guidelines indicate that in the situation where lands are not activated – for any reason – it will be necessary to identify other suitable lands, where the probability of development is hig her.

It is considered opportune to identify up to 50% additional lands suitable for residential use – up to 50 hectares – to ensure compliance with the "additional provision" required by the Guidelines.

To this end, several options have been examined, and a recommendation is included in the next section of this Report.



2 Options considered by the Council

In order to support the Elected Members in deciding on how to comply with the Minister's request (as per the letter dated 30 July 2025), three options were identified and presented to the Members during a workshop on 13 October 2025. The options are summarised below.

Option 1	Option 2 (A and B)	Option 3
Await the issuing of a Final Ministerial Direction before deciding on whether (or not) to carry out a variation of the development plan	Identify sites (up to 50 ha of land) for release (by variation) from the Strategic Land Reserve: (2A) in Sligo Town only OR (2B) in Sligo Town and in the Support Towns of Ballymote, Enniscrone, Tobercurry	Amend (by variation) the Development Plan's policies relating to the Strategic Land Reserve, to facilitate housing development where it can be demonstrated that lands are adequately serviced

2.1 Option 1 – Await Final Direction

Given that the adopted zoning (residential and mixed uses including residential) of circa 55 ha of land has been made ineffective by the Draft Direction, there is no certainty regarding the final amount of land zoned for housing in the CDP.

This option involves holding off until the issuing of a Final Ministerial Direction would provide the necessary basis for assessing the housing potential of lands zoned for residential and mixed uses. Should this potential be lower than the requirements of the HGR Guidelines, (i.e. including an additional provision of up to 50%), a Development Plan variation would be necessary.

If a variation is demonstrably necessary, the next step would be to choose between Option 2 and Option 3.

Pros and cons

Positive consequences (potential) – holding off until the Minister makes a decision regarding the contents of the Direction may, in fact, hasten/trigger the issuing of the Final Direction. This would provide the evidence basis for decision-making regarding the opportunity and scope of a Development Plan variation.

Negative consequences – an excessive waiting period would obviously delay the implementation of the policies and objectives of the Housing Growth Requirements Guidelines. This would not be appropriate, given the urgency expressed in the Minister's letter (dated 30 July 2025) – *"there is now an urgent need for development plans to be updated to reflect the requirements of the recently approved Revised NPF in respect of housing"*.

2.2 Option 2 – Release lands from the Strategic Land Reserve

This option involves the examination of lands included in the Strategic Land Reserve. The purpose is to identify those sites which would be the most appropriate – in terms of infrastructure and location – for residential/mixed use. The sites would then be zoned accordingly through a Development Plan variation procedure.

The selection of sites – up to 50 hectares in total (refer to page 12 for calculations) – would be carried out based on the Infrastructure Assessment and Settlement Capacity Audits already published as part of the adopted CDP (with minor updates or corrections, where applicable).

Two sub-options have been considered:

2A focus on Sligo Town, selecting up to 50 hectares from SLR sites

2B select sites up to 50 hectares from SLR sites in Sligo Town and in the Support Towns (Ballymote, Enniscrone, Tobercurry)

Pros and cons

Positive consequences – this option (both sub-options) is consistent with the 'additionality' of *"up to 50% over and above the housing growth requirement for each local authority"* specified in the Policy and Objective 2 of the HGR Guidelines. It also involves the selection of the most suitable sites, based on clear criteria.

Negative consequences – reopening the debate on residential zoning has the potential to generate requests for considering other sites across the County, not necessarily suitable for housing or notpreviously assessed in terms of infrastructure availability. Choosing this option would also lead to a longer time for preparing documents for consultation on the proposed variation.

2.3 Option 3 – Amend the SLR policies to open land for development

In the adopted Plan, the Strategic Land Reserve policies restrict development with only two exceptions: shortage of housing land (due to faster-than-expected house-building or demonstrable constraints to development) and identification of sites for social and affordable housing as part of the Council's Housing Delivery Action Plan (HDAP).

The amendment of the SLR policies would reduce their number and would retain the current restriction while reformulating one of the two exceptions as shown on the next page

Pros and cons

Positive consequences – in principle, this option removes any potential bias or error in deciding which additional lands should prioritised for residential development, as it theoretically opens for development the entire Strategic Land Reserve of the County, which amounts to circa 218 ha.

Where developers can demonstrate (at pre-application consultation stage) that essential infrastructure – such as water supply, wastewater drainage and transport – is already in place or under construction, **any site included in the SLR will be considered suitable – in principle – for residential development.**

Negative consequences (potential) – there are six Compact Growth policies in Chapter 10 of the CDP, the first one relating to sequential development. Residential proposals on SLR sites which are/have become serviced may not be able to demonstrate 100% compliance with all six policies. Planning decisions in favour of residential development may result in the construction of new housing in locations that are not adjoining existing built-up areas – particularly in Sligo Town – at least until infill development takes place. However, given the growing housing deficit, some temporary gaps in the urban fabric might have to be accepted.

Existing SLR policies in Chapter 10 (Urban development principles) of the adopted CDP:

Strategic Land Reserve policies

It is the policy of Sligo County Council to:

P-SLR-1 Restrict development on lands included in the Strategic Land Reserve, which are shown on the Zoning Maps pertaining to the towns and villages plans contained in this CDP.

P-SLR-2 Release lands from the Strategic Land Reserve only in the following exceptional circumstances:

A. The Planning Authority considers that the development of zoned lands is progressing faster than expected and a shortage of residential land may arise during the lifetime of the CDP, as a result of zoned land not coming forward for development due to demonstrable constraints.

B. The lands have been identified for the provision of social and affordable housing as part of the Local Authority Housing Delivery Action Plan.

P-SLR-3 Any land release from the SLR shall be supported by factual evidence demonstrating that the lands proposed to be released are/have become fully serviced and can deliver residential development within the lifetime of the Plan, thus facilitating progress towards the housing targets for the respective settlement.

P-SLR-4 The land release shall be done using the development plan variation procedure.

Proposed amendments to SLR policies:

Strategic Land Reserve policies

It is the policy of Sligo County Council to:

P-SLR-1 Restrict development on lands included in the Strategic Land Reserve, which are shown on the Zoning Maps pertaining to the towns and villages plans contained in this CDP.

P-SLR-2 Exceptions to the above policy will only be considered in the following circumstances:

A. The lands have been identified for the provision of social and affordable housing as part of the Local Authority Housing Delivery Action Plan.

B. There is factual evidence that such lands are/have become fully serviced in terms of water supply, wastewater and transport infrastructure.

Any proposal for residential or mixed-use development (including residential) on such lands must have regard to the **Compact Growth policies** set out in **Section 10.4, Chapter 10** (this chapter) of the Development Plan.

The proposal must also demonstrate capability to deliver residential development within the lifetime of the Plan, thus facilitating progress towards the housing targets for the respective settlement.

The Compact Growth policies (which would remain unchanged in Chapter 10), mentioned in the amended policy P-SLR-2 ,are as follows:

Compact growth policies

It is the policy of Sligo County Council to:

P-CG-1 Ensure that the expansion of towns or villages takes place in accordance with the principle of sequential development, from the settlement core outwards, on infill sites, backland sites and designated Settlement Consolidation Sites.

P-CG-2 In town and village centres, promote high-q uality i nfll and backland development that consolidates and regenerates the existing urban core of the settlement and provides a diverse range of uses.

P-CG-3 Require that backland development is based on masterplans to be prepared in consultation with the Planning Authority. Piecemeal development of backlands within town and villages will be discouraged.

P-CG-4 Seek to create a strong urban edge for every town and village by preventing ribbon development onthe approaches to built- up areas and by restricting unnecessary development within the green belts around the settlement.

P-CG-5 Require new developme nt on or in the vicinity of a settlement's development limit to address the views from the approach roads and present an attractive frontage to these roads.

P-CG-6 Ensure that large areas of gre enfieldzoned land in towns and villages are developed on the basis of masterplans, to be prepared by or in consultation with the Planning Authority, in order to ensure appropriate integration of land-use and transport. Such masterplans shall be subject to public consultation and, where considered appropriate based on the extent of land involved, incorporated into the relevant statutory plan (development plan or local area plan).

2.4 Recommendation: vary the CDP as per Option 3

In light of the elected Members' feedback received during and after the workshop of 13 October 2025, **it is considered that Option 3 should be selected.**

The positive features of Option 3 largely outweigh any potential negative consequences. This Option offers equal opportunities – in principle – to all landowners or developers who have invested into servicing their respective SLR sites. Such sites will be "self-selecting" for residential development, provided that well-prepared planning applications can demonstrate compliance with all the relevant policies and objectives of the County Development Plan.

Theoretically, Option 3 opens circa 218 ha (39 sites in eight settlements, of which 19 sites are in Sligo Town) of SLR lands for residential development. This area is in addition to the 150 ha already zoned in the adopted CDP and not affected by the Draft Ministerial Direction (affected sites reverting to previous SLR zoning are included in the 218 ha).

The 368 ha (218 ha + 150 ha) have a housing capacity of 11,087 units: 4,304 units from RES + MIX zoned lands and 6,783 from SLR lands.

The total area of 368 ha might seem excessive, given that only 172 ha would be necessary for the construction of 6,048 units (new housing target of 4,032 plus 50% additional provision), at an average density of 35 units/ha. But it is highly unlikely that all the RES, MIX and SLR lands would be developed during the remaining life of the CDP (by 2030).

Nevertheless, Option 3 would offer landowners and developers a strong incentive to invest in the infrastructure required to support new housing development. If completed before 2030, such infrastructure will provide a solid basis for full residential and mixed-use zoning in the next Development Plan (which will have a 10-year lifespan).

It is recommended that Sligo County Council vary its Development Plan by amending the Strategic Land Reserve Policies included in Volume 2, Chapter 10 Urban development principles.

The Core Strategy Table (Table 3.2 in Chapter 3 Core Strategy Statement) should be updated and finalised only after the issuing of the Final Ministerial Direction and the completion of the CDP variation procedure.

Summary of potenti al housing capacity of zoned lands

New S. 28 Housing Growth Targets (HGR) allocation for County Sligo (over the life of the CDP 2024- 203

672 units per year x 6 years = 4,032 units

150% of 4,032 units = 6,048 units (additional provision of 50% included)

Housing capacity of lands zoned RES, MIX and SLR:

between 11,087 units and 11,568 units

Housing potential of lands zoned in the adopted CDP (before the Draft Direction)

RES and MIX zoning (only lands with housing potential)	Potential housing yield of RES and MIX zoned lands (dwellings)	Potential housing yield of RES and MIX zoned lands PLUS houses across villages and rural areas	Strategic Land Reserve (SLR) (only lands with housi ng potential)	Potential housing yield of the SLR (dwellings)	TOTAL potential housing yield of RES, MIX and SLR lands (dwellings)
205 ha	6,025 units (149.4 % of HGR Guidelines allocation)	6,025 + 580* = 6,605 (163.81% of HGR Guidelines allocation)	181.01 ha	5,543 units	11,568 units (285.4 % of HGR Guidelines allocation)

* It is assumed that circa 580 units will be built in small villages and rural areas over the life of the CDP 2024-2030

Shortfall before the Draft Direction: 6048 units minus **6025 units = 23 units**

(equivalent to 0.65 hectares considering an average resid ential density of 35 units/ha)

Housing potential of zoned lands based on their effective zoning (after the Draft Direction)

["effective zoning" is detailed in Section 1.4 of this Report]

RES and MIX zoning (only lands with housing potential)	Potential housing yield of RES and MIX zoned lands (dwellings)	Potential housingyield of RES and MIX zoned lands PLUS houses across villages and rural areas	Strategic Land Reserve (SLR) (only lands with housing potential)	Potential housing yield of the SLR (dwellings)	TOTAL potential housing yield of RES, MIX and SLR lands (dwellings)
150 ha	4,304 units (106.7 % of HGR Guidelines allocation)	4,304 + 580* = 4,884 (121.13% of HGR Guidelines allocation)	218.18 ha	6,783 units	11,087 units (273.46 % of HGR Guidelines allocation)

* It is assumed that circa 580 units will be built in small villages and rural areas over the life of the CDP 2024-2030

Shortfall after the Draft Direction: 6,048 units minus **4,304 units = 1,744 units**

(equival ent to circa 50 hectares considering an average residential density of 35 units/ha)

3. Next steps towards a Development Plan variation

3.1 Recommended contents of the Proposed Variation

I. In Volume 1, Chapter 3 of the CDP (Core Strategy Statement), **Section 3.1.3 Consistency with national housing supply targets** should be replaced by appropriate wording to reflect the replacement of the Housing Supply Target allocation (2020) with the new Housing Growth Requirements target (2025), as per the S. 28 HGR Guidelines.

II. **Table 5.2 Adjusted total housing demand in Co. Sligo during the Development Plan period** should be deleted from Chapter 5 Settlement Strategy (Vol. 1 of the CDP), because it has become redundant as a consequence of the 2025 HGR Guidelines replacing the S. 28 Housing Supply Target Methodology Guidelines (2020).

III. In line with the recommendation contained in Section 2.4 of this Report, the Development Plan should be varied by amending the **Strategic Land Reserve Policies** included in **CDP Volume 2, Chapter 10 Urban development principles.**

IV. The Proposed Variation should also include the **rezoning of two sites** in accordance with the Planning Authority's determinations on submissions RZLT 25-01 and RZLT 25-02 received in 2025 following public consultation on the Residential Zoned Land Tax (RZLT) draft map[1].

Please refer to Appendix B of this Report, which contains all the four parts of the Proposed Variation in the form that would be published for consultation.

[1] *The Finance Act 2024 introduced provisions for landowners to submit rezoning requests to remove their land from the liability to tax, to allow for the continued economic use of the land. Sligo County Council issued positive determinations on two requests for rezoning from residential use to a use that would reflect the ongoing agricultural use of the lands.*

3.2 Variation procedure in accordance with the PDA 2000

Step One – Confirmation the by the Elected Members

Following consideration of this Chief Executive's Report by the Elected Members at their Ordinary Meeting on 1 December 2025, it is expected that they will confirm their agreement for the contents of the Proposed Variation. After this confirmation, theDevelopment Planni rg Unit will finalise the documentation for a Draft Variation and commence the procedures set out in Section 13 of the Planning and Development Act 2000 (as amended) (PDA).

Step Two - Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA)

Article 13(k)(1) of the Planning and Development Regulations 2001 (as amended) requires the Planning Authority to ascertain that the Proposed Variation will not have significant effects on the environment.

Section 13(13) of the PDA specifies that *"an appropriate assessment of a draft variation of a development plan shall be carried out in accordance with Part XAB"*.

It will be necessary to carry out both Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) screening of the Proposed Variation.

As the CDP has already been subject of full SEA and AA before itsadoption, the proposed changes to SLR policies and the dezoning of two sites would notbe expected to have significant additional effects on the environment.

For the purpose of SEA, where it is NOT determined that the Proposed Variation would be likely to have significant environmental effects, the Planning Authority must notify the prescribed environmental authorities, inviting submissions during a specified period of minimum 4 weeks.

The Planning Authority will then make a determination and publish a copy of its decision ,including the reasons for not requiring a full environmental assessment.

Step Three – Draft Variation: statutory notifications

In accordance with Section 13(2)(a) of the PDA, where the Planning Authority proposes to make a variation of its existing development plan, it must give notice to the Minister for DHLGH, the Minister for Tourism, Culture, Arts, Gaeltacht, Sport and Media the Office of the Planning Regulator, An Coimisiún Pleanála, the Northern and Western Regional Assembly, the planning authorities of adjoining counties, the prescribed autho rités (listed in the Planning Regulations) and the Local Community Development Committee. The same notice must be published in one or more local newspapers.

The notice wil lalso indicate that the Planning Authority's decision on the requirement for environmental assessments (SEA and AA) is available for inspection by the public in hard copy and on the Council's website, together with the Draft Variation.

Any person or organisation will be able to make a submission during a specified period of minimum 4 weeks. S ubmissions will be published on the Council's Consultation Portal within 10 working days of receipt.

Step Four - Chief Executive's Report

Following public consultation, the Chief Executive must prepare a report summarising the issues raised in submissions and give a response to those issues. The Minister or the Office of the Planning Regulator may make recommendations, which must be addressed in the first instance.

Within 8 weeks of the date of the public notice, the Chief Executive's report must be submitted to the Elected Members for consideration during a Council meeting.

Step Five – Consideration by Elected Members

After receiving the Chief Executive's Report, the Elected Members will have six weeks to consider the following:

- the Draft Variation;
- any potential for significant effects on the environment (as per the determination at Step Two);
- the Chief Executive's recommendation on the manner of addressing issues raised in submissions.

At this stage, the Elected Members may pass a resolution to:

- make the variation, with or without further (minor) modifications OR
- refuse to make the variation.

The process ends if the Members decide to make the variation, which becomes effective immediately.

If the Members decide, by resolution, to make material modifications (i.e. propose amendments) to the Draft Variation, these proposed amendments must go on public display for a period of at least four weeks, but only after they are assessed for potential environmental impacts.

Step Six – Proposed Amendments to the Draft Variation

The Proposed Amendments and any accompanying environmental reports must be placed on public display for a period of four weeks (minimum).

The Planning Authority will issue a public notice, inviting the public and prescribed bodies to participate in the final round of consultation. All submissions received during the third public consultation phase will be summarised in a second Chief Executive's Report.

Step Seven – Elected Members make the Variation

After considering the Proposed Amendments and the Chief Executive's recommendations on the issues raised during the second phase of consultation, the Members will finally adopt/make the Variation of the Development Plan, which will become operational from the day it is made.

3.3 Estimated timeframe for making the Variation

After the Elected Members consider this Chief Executive's Report and decide on the contents of the Draft Variation, Sligo County Council must adhere to the statutory process set out in Section 13 of the Planning and Development Act 2000 (as amended) and the procedure outlined in Article 13(K) of the Planning and Development Regulations 2001 (as amended).

The estimated timeframe for the Development Plan Variation process is provided below, assuming that the Elected Members make their decision during the ordinary Council meeting on 1st December 2025. Stages that directly involve the Elected Members are indicated in green type.

Development Plan Variation process and estimated timeframe

1. *Members confirm the contents of the Draft Variation, after consideration of the Chief Executive's Report on the application of S.28 HGR Guidelines – 1 December 2025*
2. *Preparation of Draft Variation and associated environmental reports (SEA and AA screening) for consultation with prescribed environmental authorities – by 19 December 2025*
3. *Environmental authorities are given 4 weeks to respond to consultation – from 19 December to 30 January (9 days over the Christmas period are disregarded, as specified in the Planning and Development Act 2000, as amended)*
4. *Based on the above consultation, the Planning Authority makes the SEA and AA Determinations for publication alongside the Draft Variation – by 6 February 2026*
5. *Give notice of publication of the Draft Variation to the public and the prescribed bodies – during the week of 9-13 February 2026*
6. *Draft Variation on public display for 4 weeks – 13 February to 13 March 2026*
7. *Chief Executive's Report on submissions submitted to Members – by 10 April 2026*
8. Members may wish to modify the Draft Variation or **accept the Manager's recommendations and make the Variation without further modifications – on 11 May 2026** (ordinary Council meeting). **In this case, the Variation comes into effect on the same day.**
9. If the proposed modifications are a material alteration of the Draft Variation, publish notice within two weeks of Members' decision, i.e. by 22 May 2026, specifying the additional time required for carrying out SEA and AA of the proposed material alteration
10. Put the proposed amendments on public display and invite submissions (minimum four weeks) – possibly from 12 June to 10 July 2026
11. Chief Executive's Report on submissions and observations submitted to Members by 7 August 2026
12. Members make the Plan with or without the proposed amendments on 7 September 2026
13. The Variation comes into effect on the day it is made, i.e. 7 September 2026

SLIGO COUNTY COUNCIL

RESOLUTION

Item on Agenda: 16

Meeting date: 1st December, 2025

PROPOSED BY: Cllr. J. Queenan

SECONDED BY: Cllr. F. Nealon

AND RESOLVED:

Having considered the **Chief Executive's Report** prepared on foot of the Section 28 Guidelines for Planning Authorities entitled 'NPF Implementation: Housing Growth Requirements', it is hereby agreed to commence the process of making a **Variation** to the Sligo County Development Plan 2024 – 2030 in accordance with the recommendation contained in the Chief Executive's Report.

At the meeting of the Council held this 1st day of December 2025

the above Resolution was AGREED / CARRIED / LOST

SIGNATURE OF CATHAOIRLEACH:

Huge Concern for Habitat

Alerting Authorities in 2016

Killaspugbrone looped trail - attached

Gmail

Ann McKirdy <annmckirdy@gmail.com>

Very Important : Transcript of Special Area of Conservation, Killaspugbrone, Co[illegible]ty Council

3 messages

Ann McKirdy <annmckirdy@gmail.com> Wed, May 11, 2016 at 6:11 PM
To: mcarty@sligococo.ie, jboydell@sportireland.ie

Sligo County Council signpost transcript Killaspugbrone.docx
42K

Ann McKirdy <annmckirdy@gmail.com> Thu, May 12, 2016 at 1:28 PM
To: cgonley@sligoleader.com, Sligo Walks <dkennedy@sligoleader.com>, sineadmaguire@yahoo.com, dbree@eircom.net

Please find attached a very important transcript of the sign erected by the Sligo County Council at the Killaspugbrone Special Area of Conservation site, Killaspugbrone, Strandhill.

--------- Forwarded message ---------
From: **Ann McKirdy** <annmckirdy@gmail.com>
Date: Wed, May 11, 2016 at 6:11 PM
Subject: Very Important : Transcript of Special Area of Conservation, Killaspugbrone, County Council
To: mcarty@sligococo.ie, jboydell@sportireland.ie

Sligo County Council signpost transcript Killaspugbrone.docx
42K

Ann McKirdy <annmckirdy@gmail.com> Sat, Jan 8, 2022 at 2:11 PM
To: Aine Nic Amhlaidh <Ainenicamhlaidh@gmail.com>

[Quoted text hidden]

Sligo County Council signpost transcript Killaspugbrone.docx
42K

Raised Concern Immediately May 2016 upon seeing sign 'Lub Naisiúnta'

Sligo County Council, Public Information Sign

The sand dunes in the vicinity of this sign are a very special place for our natural heritage. Accordingly the area is included in the Cummeen Srand/Drumcliff Bay Special Area of Conservation (SAC) as designated under the EU Habitats Directive. Member states are required by law to protect the habitats and species found here so that future generations may also enjoy this aspect of our wildlife heritage.

A particularly interesting area is to be found just outside of the fence of the Sewage Treatment plant and we request that you avoid walking in this area unless you are specifically going to view the flora.

There are over 90 species of wild plant recorded from his small area of sand dunes. Some of the grass-like plants are vitally important in binding the sand and stabilising the dunes such as:

Red fescue
Marram Grass
Sand sedge

Others are specialists of lime rich habitats such as dunes that contain shell sand:

Kidney vetch
Bird's foot trefoil
Lady's bedstraw
Wild thyme

And some less common flowers found here:

Autumn gentian
Field gentian
Yellow wort
Hairy rock-cress
Common broomrape

Of great beauty and often with a degree of rarity are the orchids and this area has quite a selection of species including

Pyramidal orchid
March heleborine
Broad leaved marsh orchid
Bee orchid

The hollows between the sand hills are often damp where the water table comes near to the ground surface and here we can find

Meadow thistle
Adder's tongue (an unusual fern)

There are also several animals of sand dune habitat found here that are uncommon or rare. These include moths, butterflies a bumblebee (Bombus magnus) and a variety of different snails including the very rare Vertigo angustior. This tiny snail is common here, but in Europe it is a great rarity and is specifically protected under the EU Habitats Directive. Birds

of the area include the meadow pipit, skylark and stonechat. From dusk onwards there is a chance of seeing a badger in these dunes and long-eared owl is known from the vicinity.

Please help protect this site by taking pleasure from what you see and becoming informed about your heritage. Enjoy looking at the wildflowers but refrain from picking them. If you are just passing through the area, keep to the paths to avoid trampling the flowers.

Do not light fires in the dunes.

This sign was erected by Sligo County Council with advice from :
Dr. Don Cotton, Senior Lecturer, IT, Sligo
Tom Roderick, Conservation Ranger, National Parks and Wildlife Service
Siobhan Ryan, Heritage Officer, Sligo County Council.
****

I have also included a link below to the *'Action Plan for Dune and Machair Birds in Ireland, 2011-2020.'* This is a very significant document as it outlines the responsibility to protect threatened species. The Killaspugbrone SAC habitat is home to the following DUNE NESTING BIRDS; tern, the stonechat, the skylark, the common gull. It is imperative that we protect the dunes from accidental destruction by walkers.

www.birdwatchireland.ie/LinkClick.aspx?fileticket=Ep01XTcsaqk%3D&tabid=946



'The stone chat is a small little bird often seen perched on a post You will often see it flicking its wings and tail and calling with short 'chipping' notes and sounds like a few small stones shaken together in your fist. That is why it is called a stonechat because of the sound it makes. In summer the male is brightly coloured with its orange breast, black head and white front. The female, young and winter male are rather dull-coloured versions of the summer colours.

It can be seen in rough ground and scrubland and along the coast. Its favourite place to build a nest is in a gorse bush. Gorse looks and smells lovely springtime. It used to be more widespread but because of the large number of farmers and sprays, it had to leave farmland.'

'The Skylark builds its nest on the ground within tall vegetation to hide from predators. They can be seen, or more often heard, singing above these habitats.'

.

Action Plan for Dune and Machair Birds in Ireland, 2011-2020
re: Legislation to Protect Endangered Species;

"Irish and European legislation also provides for the protection of sites of special conservation interest for particular species and habitats. Site designation is amongst the strongest forms of protection for threatened species. The European Birds and Habitats Directives are particularly relevant as they provide the means to designate important international areas of conservation concern for priority bird species, through Special Protection Areas (SPAs) and biodiversity and habitats, through Special Areas of Conservation (SACs)[…]The requirement to protect habitats for bird outside of designated sites through national policy and local government policy and decision-making is also a requirement of the Habitats and Birds Directives.

Quote from: 1.2 Why Ireland's birds need action now, **'Action Plan for Dune and Machair Birds in Ireland, 2011-2020.'**

A review of Ireland's birds was conducted by Lynas et al.3in 2007; it found that many of our birds have undergone huge population and range declines, 90% or more for some species. Sadly, one species (the Corn Bunting) has become extinct in this country since the previous assessment of the conservation status of birds in Ireland in 1999. There are currently more species on the Red and Amber Birds of Conservation Concern in Ireland (BoCCI) list than ever before. Ireland also has responsibilities for a number of bird species of European and global importance that are experiencing international declines (see

Table 2 for more information on the conservation status of the species in this group). ****THE SLYLARK IN KILLASPUGBRONE SAC IS LISTED IN TABLE 2, Amber Bird Conservation.***

The Birds Directive (2009/147/EC) and Habitats Directive (92/43/EEC) provide the framework for the protection of Europe's wildlife and are transposed through regulations, most recently the European Communities (Birds and Natural Habitats) Regulations 2011. These regulations are mainly implemented in Ireland through the Wildlife Act 1976 and Wildlife (amendment) Act 2000.

Fulfilling our obligations under these Directives is vital to protect biodiversity, ecosystems and the services they provide us.'

We have a collective responsibility to ensure that this delicate Special Area of Conservation is protected.

I will close with a poem by Seamus O'Sullivan, written in Sligo, 'The Starling Lake,'. It is an evocative reminder of our responsibility to future generations that they may experience the sights and sounds we as custodians have preserved for their enjoyment.

My sorrow that I am not by the little dún

By the lake of the starlings at Rosses under the hill,

And the larks there, singing over the fields of dew,
Or evening there and the sedges still.
For plain I see now the length of the yellow sand,
And Lissadell far off and its leafy ways,
And the holy mountain whose mighty heart
Gathers into it all the coloured days.
My sorrow that I am not by the little dún
Bu the lake of the starlings at evening when all is still,
And still in whispering sedges the herons stand.
'Tis there I would nestle at rest till the quivering moon
Uprose in the golden quiet over the hill.

I look forward to hearing from you.

Yours sincerely,

Ann McKirdy

June Boydell

Declan Bre

2016 Concern Looped Trail

Gmail

Killaspugbrone, Strandhill, Sligo National looped

8 me ages

Ann McKirdy <annmckirdy@gmail.com>
To: jboydell@sportireland.ir

>
> Cc: June Boydell, National Trails and Walks
>
>
> Dear Michael,
>
>
>
> I am writing to follow up on my query yesterday regarding the Environmental
> Impact Report I had requested to see regarding the development of the
> National Looped Walk in the Special Conservation Area of Killaspugbrone. I
> had requested to view this report as I have seen an alarming degradation of
> this Special Conservation Area due to the increase in walkers since the new
> National Looped Walk has opened. I was very surprised and disappointed to
> learn that no Environmental Impact Report had been undertaken in spite of
> the fact that this area is designated under EU law as a Special Area of
> Conservation.
>
>
>
> According to the County Sligo Development Plan 2011-2017 Natura Impact
> Report 2013 there are specific requirements and obligations on the County
> Council to ensure that no development will take place in these SAC's
> without appropriate assessment.(National Parks and Wildlife Service
> Ballysadare Bay SAC; http://www.npws.ie/protected-sites/sac/000622)
>
>
>
> You had mentioned during our conversation that the County Council did not
> do anything except signpost an existing pathway. The Killaspugbrone
> Preservation Project contradicts this, its report states 'In 2005/2006
> consultations were held with the Sligo County Council to establish which
> paths should be used. Grant aid and Project funds financed the erection of
> finger-posts on the paths and this greatly helped the protection of the
> dunes.' Local resident, Deirdre Foley, who is in her 80's and has lived
> here all her life and whose family is buried in Killaspugbrone says access
> to the church was always by the shore.
>
>
>
> Sligo County Council's mandate is to protect this area, your own report has
> highlighted the necessity for a raised board walk if this area was to be
> further developed for tourism. To re state the importance of this SAC and
> quote from the Council's own report, 'The Department recognises that this
>
> ---- Message truncated ----
>

Mail Delivery Subsystem <mailer-daemon@googlemail.com> Wed, May 11, 2016 at 3:04 PM
To: annmckirdy@gmail.com

Delivery to the following recipient failed permanently:

jboydell@sportireland.ir

Technical details of permanent failure:
DNS Error: 220493353 DNS type 'mx' lookup of sportireland.ir responded with code NXDOMAIN
Domain name not found: sportireland.ir

---- Original message ----

DK Signature: v=1; a=rsa-sha256; c=relaxed/relaxed;
d=gmail.com; s=20120113;
h=content-transfer-encoding:from:mime-version:subject:message-id:date
:to;
bh=wlfEdNIXsdynt53iOZLh/56PqPezfbwbR+LcYN9X9o0=;
b=wM1Vd2+Pf0c/d/dlVo+mAXOoQfWH8BZ+1xzpki5U5xavTTJw2HKTXvRLrAf1qslFwg
vzyJTk+3i++Owb2yENHDmRj/2zeei9w6bpbPCLpDWF28RHh9Wpwn3amHdvJe43FVfUjj
MPnSYwT8g44oD7Qh0qnwhNHUESMimGTHl1SoV4OqF7LwsglHEGMQ0jzgj7HotmbF4nle
ur+EXgt+vQkBW+34g473Jil2wGZ58xb1OXb3tcULfYvHzZCSxm2pTX+dk/aTszenGnNg
FK2WqikD1EJJp9SXscmJtHcoMVFXdrWHECf1wq7XdR8/hiPNICluUOGZc/dAsZ0orL/4
MAKQ==
X-Google-DKIM-Signature: v=1; a=rsa-sha256; c=relaxed/relaxed;
d=1e100.net; s=20130820;
h=x-gm-message-state:content-transfer-encoding:from:mime-version
:subject:message-id:date:to;
bh=wlfEdNIXsdynt53iOZLh/56PqPezfbwbR+LcYN9X9o0=;
b=SX59pCRSb9hZZ62w2xm2kegR2iqTzMKIEvs/xcBFm8P7sovAcf5wn/869wUsp6eqAL
36CuHrrfcRaV+mSUyVWg25Bn/lRmuN4mEbHrshVPdSMuTcktfiLQ3qxd+leHlOgrJgAO
vd/P7tQbtpN0YSyLhSw69QUvXVDuOW+LjbG6RSAtPibpWi6v0zxOz1vtbf1TdVlNQ50B
JS2U3R/C9Q4SZU+UReACnGnKm2pCFZB8aqlfDXZcRO0/VGl26umEU58ho4ymSdZRGhHd
oNA+y03Lje5okSxNtV7QNpTv6mDtZ1mrUlHplYHm5xVZYFqPi0+u7iruGYcutx3veBes
oKRw==
X-Gm-Message-State: AOPr4FX/TD/NMZtHjxJii2iEDlVws83QrldvwaQZafoXlYdaL0n+htAlWGWy4S6iL0QE4g==
X-Received: by 10.194.14.130 with SMTP id p2mr4236050wjc.173.1462975457324;
Wed, 11 May 2016 07:04:17 -0700 (PDT)
Return-Path: <annmckirdy@gmail.com>
Received: from [10.72.65.169] ([213.233.150.28])
by smtp.gmail.com with ESMTPSA id a207sm8746435wma.8.2016.05.11.07.04.16
for <jboydell@sportireland.ir>
(version=TLSv1/SSLv3 cipher=OTHER);
Wed, 11 May 2016 07:04:16 -0700 (PDT)
Content-Transfer-Encoding: quoted-printable
Content-Type: text/plain;
charset=utf-8
From: Ann McKirdy <annmckirdy@gmail.com>
Mime-Version: 1.0 (1.0)
Subject: Killaspugbrone, Strandhill, Sligo National looped walk
Message-Id: <E1CB38AF-21A1-43D2-8B10-1EB53AC5DB3B@gmail.com>
Date: Wed, 11 May 2016 15:04:15 +0100
To: jboydell@sportireland.ir
X-Mailer: iPhone Mail (13E238)
[Quoted text hidden]
----- Message truncated -----

Ann McKirdy <annmckirdy@gmail.com> Thu, May 12, 2016 at 1:21 PM
To: dkennedy@sligoleader.com, sineadmaguire@yahoo.com, dbree@eircom.net, cgonley@sligoleader.com, jboydell@sportireland.ie, mcarty@sligococo.ie

cc: Chris Gonley
cc: Sinead Maguire
cc: Declan Bree
cc: Michael Carty
cc: June Boydell

Dear Deirdre,

You may recall that I spoke with you some weeks ago regarding my concern for the extensive damage being done to the Special Area of Conservation (SAC) by walkers on the Killaspugbrone loop. I am forwarding the emails I have sent to Michael Carty, Sligo County Council and June Boydell, Irish Trails regarding my concerns for the Special Area of Conservation in Strandhill, since this has been included in the Lúb Náisiúnta.

I was very surprised to learn that there was no environmental impact report undertaken prior to opening this National Loop on a European Union designated SAC protected site. This area has a special designation under EU law, the Sligo County Council (on behalf of the Irish Government) have an obligation to protect this area.

I apologise for omitting to send this to you yesterday. I will forward all emails pertaining to this that I have sent to Michael Carty and June Boydell.

I a. .ıot opposed to tourism, I believe it is a wonderful boost to the local economy, and to Sligo in general. The area I am concerned about is of national importance as a heritage site (Killaspugbrone Church dates back to the 5th Century) and a Special Area of Conservation.

It is important to note the history of unstable sand and the damage unstable sand caused in the past. Maaram grass was planted in the 19th Century to stabilise shifting sands blowing over the original settlement. At that time the thatch cottages were inundated by sand causing the roofs to cave in. The inhabitants were forced to move to the slopes of Knocknarea.

Marram grass can stabilise up to 40 meters of sand, it was planted for this purpose in Strandhill over 100 years ago. It has also been used extensively in the Netherlands to reclaim land from the sea. It is essential that we maintain this grass to stabilise our protected dune systems. The grasses are also home to the dune nesting birds, specifically the sky lark and the tern which are on the EU Amber List for protected species.

We are custodians of this beautiful place, it is our responsibility to ensure this Special Area of Conservation is protected. There should be a raised board walk to keep walkers from destroying this delicate ecosystem.

I look forward to your response.
Sincerely,
Ann McKirdy

-------- Forwarded message --------
From: **Ann McKirdy** <annmckirdy@gmail.com>
Date: Wed, May 11, 2016 at 3:04 PM
Subject: Killaspugbrone, Strandhill, Sligo National looped walk
[Quoted text hidden]

Ann McKirdy <annmckirdy@gmail.com> Thu, May 12, 2016 at 1:22 PM
To: jboydell@sportireland.ie

-------- Forwarded message --------
From: **Ann McKirdy** <annmckirdy@gmail.com>
Date: Wed, May 11, 2016 at 3:04 PM
Subject: Killaspugbrone, Strandhill, Sligo National looped walk
To: jboydell@sportireland.ir

>
[Quoted text hidden]

Michael Carty <mcarty@sligococo.ie> Fri, May 13, 2016 at 2:45 PM
To: Ann McKirdy <annmckirdy@gmail.com>, "dkennedy@sligoleader.com" <dkennedy@sligoleader.com>, "Cllr. Sinead Maguire" <sineadmaguire@yahoo.com>, Cllr Declan Bree <dbree@eircom.net>, "cgonley@sligoleader.com" <cgonley@sligoleader.com>, "jboydell@sportireland.ie" <jboydell@sportireland.ie>
Cc: Deirdre Kennedy <dkennedy@sligoleader.com>

Dear Ms. McKirdy,

Thank you for your mail.

I wish to apologise, clarify and correct any confusion which may have arisen during our telephone conversation. An Appropriate Assessment (AA) screening report was carried out ,as required under the Habitat's Directive was for the Killaspugbrone Loop walk. It is available in hardcopy at the Sligo County Council offices, City Hall for review upon request.

I welcome your concept idea of a raised boardwalk, and will investigate potential funding opportunities in this regard.

Yours,

Michael Carty

Michael Carty

Senior Executive Engineer

Sligo County Council

City Hall

Quay St.

Sligo

mcarty@sligococo.ie

tel. (w) 0719114403

Sligo

Sets your spirit free

[Quoted text hidden]

Please help our environment by not printing this email This message is intended only for the use of the person(s) ("the intended recipient(s)") to whom it is addressed. It may contain information which is privileged and confidential within the meaning of applicable law. If you are not the intended recipient, please contact the sender as soon as possible. The views expressed in this communication may not necessarily be the views held by Sligo County Council. Any attachments have been checked by a virus scanner and appear to be clean. Please ensure that you also scan all messages as Sligo County Council does not accept any liability for contamination or damage to your systems.

SÉANADH: Is d'úsáid an duine/na ndaoine chuig a bhfuil sí seolta agus sin amháin atá an teachtaireacht seo. D'fhéadfadh go bhfuil faisnéis faoi phribhléid nó faoi rún de réir bhrí an dlí is infheidhme inti. Mura tusa an seolaí a bhí beartaithe, bí ar an eolas go bhfuair tú an ríomhphost seo in earráide agus go bhfuil cosc iomlán ar an ríomhphost seo, nó aon chuid de, a úsáid, a scaipeadh, a chur ar aghaidh nó a chóipeáil. Má fuair tú an ríomhphost seo de bharr earráide, téigh i dteagmháil leis an seoltóir chomh luath agus is féidir, le do thoil. Ní gá gurb ionann dearcaí na ríomhphosta seo agus dearcaí Chomhairle Chondae Sligeach. Tá aon iatáin seiceáilte ag scanóir víris agus dealraíonn sé go bhfuil siad glan. Bí cinnte go ndéanfaidh tusa scanáil ar gach

teachtaireacht chomh maith, le do thoil, mar ní ghlacann an Chomhairle dliteanas ar bith i leith éilliú ná dámáiste do do chuid córas.

Ann McKirdy <annmckirdy@gmail.com> Mon, May 8, 2017 at 7:45 PM
To: Declan Bree <dbree@eircom.net>

De Declan,
Thank you for taking my call. I am forwarding the reply I received from Michael Carty last year regarding the possibility of a raised board-walk for the fragile areas of the Killaspugbrone Looped Trail.

The justification I received from the County Council for not carrying out an in depth environmental impact assessments on this Special Area of Conservation was that the County Council simply signposted an existing Looped trail. I know this to be erroneous, there is no record of this and locals will confirm this.

The County Council's mandate is to protect this SAC and this failure to assess the impact of increased usage is causing a rapid erosion of the dune system. The tramping on Marram Grass kills the grass and the delicate web of roots which binds sand.

I understand from our conversation that the only way to address this issue is through judicial review. However, I believe we are all partners in environmental conservation and would hope that the County Council would actively seek funding for a raised boardwalk through the sensitive dune areas of this Looped trail and honour their conservation mandate.

I believe not only would this preserve this delicate and unique ecosystem, it would facilitate improved access for mobility impaired users and consequently increase visitors to the area and improve Strandhill's profile as a tourist destination.

I'd like to thank you for your dedication to the Strandhill Community and especially thank you for your work on the Maratime Center.
Kind regards,
Ann
[Quoted text hidden]

Ann McKirdy <annmckirdy@gmail.com> Sat, Jan 8, 2022 at 2:00 PM
To: Aine Nic Amhlaidh <Ainenicamhlaidh@gmail.com>

[Quoted text hidden]

Ann McKirdy <annmckirdy@gmail.com> Sat, Jan 8, 2022 at 2:24 PM
To: Aine Nic Amhlaidh <Ainenicamhlaidh@gmail.com>

---------- Forwarded message ---------
From: **Ann McKirdy** <annmckirdy@gmail.com>
Date: Wed, May 11, 2016 at 3:04 PM
Subject: Killaspugbrone, Strandhill, Sligo National looped walk
To: <jboydell@sportireland.ir>

>
[Quoted text hidden]

SCREENING
FOR
APPROPRIATE ASSESSMENT REPORT

FOR THE

SLIGO LOCAL ECONOMIC AND COMMUNITY PLAN 2023-2030
IN ACCORDANCE WITH THE REQUIREMENTS OF
ARTICLE 6(3) OF THE EU HABITATS DIRECTIVE

0.15 hectares net gain

1 acre in Strandhill

1 hectare = 2.47 acres

2024-30

for: **Sligo County Council**

County Hall
Riverside
Sligo
County Sligo

Sligo Co. Co.
AA Screening
2023-2030

by: **CAAS Ltd.**

1st Floor
24-26 Ormond Quay Upper
Dublin 7

Folio
28151F

MARCH 2023

Conclusion pg 40
A stage 2 is not required

Table of Contents

ɛction 1 Introduction **1**
1.1 Background 1
1.2 Legislative Context 1
1.3 Approach 1
Section 2 Description of the Plan **3**
Section 3 Screening for Appropriate Assessment **5**
3.1 Introduction to Screening 5
3.2 Identification of Relevant European Sites 5
3.3 Assessment Criteria and Screening 9
3.4 Other Plans and Programmes 42
Section 4 AA Screening Conclusion **43**

Appendix I Background information on European Sites

Section 1 Introduction

1.1 Background

This Appropriate Assessment (AA) Screening Report (also known as *Stage One* AA) has been prepared to assess whether or not a Natura Impact Statement (NIS) (also known as *Stage Two* AA) is required for the Sligo Local Economic and Community Plan 2023-2030 to be adopted ("the Plan"). AA is a procedure carried out in accordance with the requirements of Article 6(3) of Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (as amended) (hereafter referred to as the "Habitats Directive").

1.2 Legislative Context

The Habitats Directive provides legal protection for habitats and species of European importance. The overall aim of the Habitats Directive is to maintain or restore the "favourable conservation status" of habitats and species of European Community Interest. These habitats and species are listed in the Habitats and Birds Directives (Council Directive 2009/147/EC on the conservation of wild birds) with Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) designated to afford protection to the most vulnerable of them. These two designations are collectively known as European sites and Natura 2000.

AA is required by the Habitats Directive, as transposed into Irish legislation by the European Communities (Birds and Natural Habitats) Regulations 2011 (as amended) and the Planning and Development Act (as amended). AA is an assessment of the potential for adverse or negative effects of a plan or project, in combination with other plans or projects, on the conservation objectives of a European site. These sites consist of SACs and SPAs and provide for the protection and long-term survival of Europe's most valuable and threatened species and habitats.

1.3 Approach

The AA process is based on best scientific knowledge and has utilised ecological and hydrological expertise. In addition, a detailed online review of published scientific literature and 'grey' literature was conducted. This included a detailed review of the National Parks and Wildlife (NPWS) website including mapping and available reports for relevant sites and in particular sensitive qualifying interests/special conservation interests described and their conservation objectives.

The ecological desktop study completed for the AA screening of the Plan comprised the following elements:

- Identification of European sites within 15km[1] of the County boundary with identification of potential pathways links for specific sites (if relevant) greater than 15km from the County boundary;
- Review of the NPWS site synopsis and conservation objectives for European sites with identification of potential pathways from the County; and
- Examination of available information on protected species.

There are four main stages in the AA process as follow:

Stage One: Screening
The process that identifies the likely impacts upon a European site of a project or plan, either alone or in combination with other projects or plans and considers whether these impacts are likely to be significant.

[1] Beyond 15km landscape scale ecological interactions are likely to minimise potential effects unless significant hydrological pathways are present.

Stage Two: Appropriate Assessment
The consideration of the impact on the integrity of the European site of the project or plan, either alone or in combination with other projects or plans, with respect to the site's structure and function and its conservation objectives. Additionally, where there are adverse impacts, an assessment of the potential mitigation of those impacts. If adequate mitigation is proposed to ensure no significant adverse impacts on European sites, then the process may end at this stage. However, if the likelihood of significant impacts remains, then the process must proceed to Stage Three.

Stage Three: Assessment of Alternative Solutions
The process that examines alternative ways of achieving the objectives of the project or plan that avoids adverse impacts on the integrity of the European site.

Stage Four: Assessment where no alternative solutions exist and where adverse impacts remain
An assessment of compensatory measures where, in the light of an assessment of imperative reasons of overriding public interest (IROPI), it is deemed that the project or plan should proceed.

The Habitats Directive promotes a hierarchy of avoidance, mitigation and compensatory measures. This approach aims to avoid any impacts on European sites by identifying possible impacts early in the plan-making process and avoiding such impacts. Second, the approach involves the application of mitigation measures, if necessary, during the AA process to the point where no adverse impacts on the site(s) remain. If potential impacts on European sites remain, the approach requires the consideration of alternative solutions. If no alternative solutions are identified and the plan/project is required for imperative reasons of overriding public interest, then compensation measures are required for any remaining adverse effect(s).

The assessment of potential effects on European sites is conducted following a standard source-pathway-receptor[2] model, where, in order for an effect to be established all three elements of this mechanism must be in place. The absence or removal of one of the elements of the model is sufficient to conclude that a potential effect is not of any relevance or significance.

In the interest of this report, receptors are the ecological features that are known to be utilised by the qualifying interests or special conservation interests of a European site. A source is any identifiable element of the Plan that is known to interact with ecological processes. The pathways are any connections or links between the source and the receptor. This report provides information on whether direct, indirect and cumulative adverse effects could arise from the Plan.

The AA Screening exercise has been prepared taking into account legislation including the aforementioned legislation and guidance including the following:

- AA of Plans and Projects in Ireland. Guidance for Planning Authorities, Department of the Environment, Heritage and Local Government, 2009;
- "Commission Notice: Managing Natura 2000 sites - The provisions of Article 6 of the 'Habitats' Directive 92/43/EEC", European Commission 2018;
- "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", European Commission Environment DG, 2002; and
- "Managing Natura 2000 sites: The Provisions of Article 6 of the Habitats Directive 92/43/EEC", European Commission, 2000.
- Practice Note PN01: Appropriate Assessment Screening for Development Management, Office of the Planning Regulator, 2021.

[2] Source(s) – e.g. pollutant run-off from proposed works; Pathway(s) – e.g. groundwater connecting to nearby qualifying wetland habitats; and Receptor(s) – qualifying aquatic habitats and species of European Sites.

Section 2 Description of the Plan

The Sligo 2030 One Voice, One Vision Strategic Framework (the Sligo 2030 Plan), is Sligo's new Local Economic and Community Plan (LECP). The Plan fulfils the requirements of the Local Economic and Community Plan as set out in the Local Government Reform Act 2014. In combination with the existing planning framework, the Plan will guide the sustainable economic and community development of the County to 2030; however, it is not binding on Sligo County Council when undertaking its functions with respect to whether or not to grant development consent for a project. The development of LECPs is a requirement for all Local Authorities to assist in guiding the development of their respective counties.

The LECP includes goals and objectives related to economic elements such as actions to promote job creation and support existing businesses, and community elements including actions to support inclusion, access to services and addressing disadvantage amongst other areas.

The Plan's overall vision is as follows:

> "The Vision is for a smart, sustainable, and socially inclusive Sligo; one that cherishes its vibrant communities, protects and celebrates its unique environment and rich culture, and is a champion of innovative growth and development."

While Sligo County Council will oversee its overall implementation, the Sligo 2030 Plan will be a shared Plan with vital roles to be played by the private sector, education providers and the wider community to ensure its success. This will include the private sector's contribution to job creation and innovation; education and training providers' role in developing a skilled talent base; the community's participation in developing an inclusive and sustainable county, and the various state and semi-state bodies that will contribute to the overall wellbeing of Sligo through the provision of adequate services and supports for the community and business.

Sligo 2030 One Voice One Vision has been prepared by Sligo County Council in conjunction with the Sligo Strategic Policy Committee (SPC) for Planning, Community & Economic Development, Arts & Culture, the Local Community Development Committee (LCDC), and Sligo Economic Forum (SEF), and has included extensive and thorough consultation with the wider community, private sector, education providers, government agencies and other key stakeholders. The Regional Assembly (NWRA) has been Consulted to ensure consistency and alignment with the Regional Spatial and Economic Strategy and the Municipal Districts have been consulted for input and consistency in relation to the economic and community elements of the plan and with the existing County Development Plan.

As detailed in the introductory section of the Plan:

> "Implementing the Sligo 2030 Plan will involve Sligo County Council helping to facilitate, promote, support and coordinate stakeholders in their activities in a way that is consistent with existing and emerging plans setting out public policy for sustainable development, including that relating to the economy, communities, infrastructure, land use tourism and environmental protection and environmental management.
>
> This Plan is situated alongside this hierarchy of statutory documents that has been subject to environmental assessment/screening for environmental assessment, as appropriate, and forms the decision-making and consent-granting framework. The Plan does not provide consent, establish a framework for granting consent or contribute towards a framework for granting consent; the Plan is not binding on Sligo County Council when undertaking its functions with respect to whether or not to grant development consent for a project.
>
> The Plan fully aligns with the provisions of the existing National Planning Framework, Ireland 2040, National Climate Action Plan 2023, Housing For All 2021, the Regional Spatial and Economic Strategy 2020-2032 and the current County Development Plan, all of which have been subject to legislative requirements relating to public consultation and environmental assessment/screening for environmental assessment. As such, the Plan is wholly subject to the requirements of the provisions set out in these documents (and any subsequent revisions to these documents), including provisions relating to sustainable development, environmental

protection and environmental management that have been integrated into these documents, including through SEA and AA processes, and does not introduce any alterations or additions to those provisions.

In order to be realised, projects included in the Plan (in a similar way to other projects fr or any other sectors) will have to comply, as relevant, with various legislation, policies, plans and programmes (including requirements for lower-tier Appropriate Assessment, Environmental Impact Assessment and other licensing requirements as appropriate) that form the statutory decision-making and consent-granting framework, of which the Plan is not part and does not contribute towards".

Section 3 Screening for Appropriate Assessment

3.1 Introduction to Screening

This stage of the process identifies any potential significant affects to European sites from a project or plan, either alone or in combination with other projects or plans.

An important element of the AA process is the identification of the "'conservation objectives", "Qualifying Interests" (QIs) and/ or "Special Conservation Interests" (SCIs) of European Sites requiring assessment.

QIs are the habitat features and species listed in Annexes I and II of the Habitats Directive for which each European Site has been designated and afforded protection.

SCIs are wetland habitats and bird species listed within Annexes I and II of the Birds Directive. It is also vital that the threats to the ecological / environmental conditions that are required to support QIs and SCIs are considered as part of the assessment.

The following NPWS Generic Conservation Objectives have been considered in the screening:

- For SACs, to maintain or restore the favourable conservation condition of the Annex I habitat(s) and/or the Annex II species for which the SAC has been selected; and
- For SPAs, to maintain or restore the favourable conservation condition of the bird species listed as Special Conservation Interests for this SPA.

Where available, Site-Specific Conservation Objectives (SSCOs) designed to define favourable conservation status for a particular habitat[3] or species[4] at that site have been considered.

3.2 Identification of Relevant European Sites

The Department of the Environment (2009) Guidance on AA recommends a 15 km buffer zone to be considered. A review of the characteristics of the Plan has identified that, in the absence of significant hydrological links, the characteristics of the Plan will not impose effects beyond the 15 km buffer. Beyond this distance potential effects are diminished due to landscape scale ecological interactions. All European sites within a 15km radius of the Plan area were examined to assess potential connectivity corridors on a landscape scale and assess potential interactions between the Plan and the conservation objectives of each of the sites.

Details of European sites that occur within 15 km of the County are listed on Table 3.1. European Sites and the EPA Rivers and Catchments are also mapped on Figure 3.1. Details of European Sites that occur outside the 15 km buffer zone of the County, but which are downstream are also provided in Table 3.1, and mapped on Figure 3.2. Information on QIs, SCIs and site-specific vulnerabilities and sensitivities (see Appendix I) and background information (such as that within Ireland's Article 17 and Article 12 Reports to the European Commission, site synopses and Natura 2000 standard data forms) has been considered.

[3] Favourable conservation status of a habitat is achieved when: its natural range, and area it covers within that range, are stable or increasing; the specific structure and functions which 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.

[4] The favourable conservation status of a species is achieved when: population dynamics data on the species concerned indicate that it is maintaining itself on a long-term basis as a viable component of its natural habitats; the natural range of the species is neither being reduced nor is 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.

Conservation objectives that have been considered by the assessment are included in the following National Parks and Wildlife Service (NPWS) documents:

NPWS (2015) Conservation Objectives for St. John's Point SAC [IE0000191] Version 1.
NPWS (2022) Conservation Objectives for River Shannon Callows SAC [IE0000216] Version 1.
NPWS (2021) Conservation Objectives for Lough Melvin SAC [IE0000428] Version 1.
NPWS (2016) Conservation Objectives for Lough Ree SAC [IE0000440] Version 1.
NPWS (2012) Conservation Objectives for Killala Bay/Moy Estuary SAC [IE0000458] Version 1.
NPWS (2020) Conservation Objectives for Doocastle Turlough SAC [IE0000492] Version 1.
NPWS (2016) Conservation Objectives for Flughany Bog SAC [IE0000497] Version 1.
NPWS (2016) Conservation Objectives for Lackan Saltmarsh and Kilcummin Head SAC [IE0000516] Version 1.
NPWS (2016) Conservation Objectives for Cuilcagh - Anierin Uplands SAC [IE0000584] Version 1.
NPWS (2015) Conservation Objectives for Bellanagare Bog SAC [IE0000592] Version 1.
NPWS (2016) Conservation Objectives for Callow Bog SAC [IE0000595] Version 1.
NPWS (2015) Conservation Objectives for Derrinea Bog SAC [IE0000604] Version 1.
NPWS (2016) Conservation Objectives for Cloonshanville Bog SAC [IE0000614] Version 1.
NPWS (2013) Conservation Objectives for Ballysadare Bay SAC [IE0000622] Version 1.
NPWS (2021) Conservation Objectives for Ben Bulben, Gleniff and Glenade Complex SAC [IE0000623] Version 1.
NPWS (2015) Conservation Objectives for Bunduff Lough and Machair/Trawalua/Mullaghmore SAC [IE0000625] Version 1.
NPWS (2013) Conservation Objectives for Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC [IE0000627] Version 1.
NPWS (2017) Conservation Objectives for Lough Hoe Bog SAC [IE0000633] Version 1.
NPWS (2019) Conservation Objectives for Lough Nabrickkeagh Bog SAC [IE0000634] Version 1.
NPWS (2021) Conservation Objectives for Templehouse and Cloonacleigha Loughs SAC [IE0000636] Version 1.
NPWS (2021) Conservation Objectives for Turloughmore (Sligo) SAC [IE0000637] Version 1.
NPWS (2021) Conservation Objectives for Union Wood SAC [IE0000638] Version 1.
NPWS (2016) Conservation Objectives for Arroo Mountain SAC [IE0001403] Version 1.
NPWS (2017) Conservation Objectives for Urlaur Lakes SAC [IE0001571] Version 1.
NPWS (2021) Conservation Objectives for Bricklieve Mountains & Keishcorran SAC [IE0001656] Version 1.
NPWS (2020) Conservation Objectives for Knockalongy and Knockachree Cliffs SAC [IE0001669] Version 1.
NPWS (2021) Conservation Objectives for Lough Arrow SAC [IE0001673] Version 1.
NPWS (2015) Conservation Objectives for Streedagh Point Dunes SAC [IE0001680] Version 1.
NPWS (2016) Conservation Objectives for Lough Forbes Complex SAC [IE0001818] Version 1.
NPWS (2021) Conservation Objectives for Unshin River SAC [IE0001898] Version 1.
NPWS (2019) Conservation Objectives for Cloonakillina Lough SAC [IE0001899] Version 1.
NPWS (2021) Conservation Objectives for Glenade Lough SAC [IE0001919] Version 1.
NPWS (2021) Conservation Objectives for Lough Gill SAC [IE0001976] Version 1.
NPWS (2016) Conservation Objectives for Ox Mountains Bogs SAC [IE0002006] Version 1.
NPWS (2016) Conservation Objectives for Boleybrack Mountain SAC [IE0002032] Version 1.
NPWS (2012) Conservation Objectives for Lower River Shannon SAC [IE0002165] Version 1.
NPWS (2019) Conservation Objectives for Lough Derg, North-East Shore SAC [IE0002241] Version 1.
NPWS (2016) Conservation Objectives for River Moy SAC [IE0002298] Version 1.
NPWS (2021) Conservation Objectives for Dunmuckrum Turloughs SAC [IE0002303] Version 1.
NPWS (2016) Conservation Objectives for Drumalough Bog SAC [IE0002338] Version 1.
NPWS (2015) Conservation Objectives for Tullaghanrock Bog SAC [IE0002354] Version 1.
NPWS (2013) Conservation Objectives for Drumcliff Bay SPA [IE0004013] Version 1.
NPWS (2013) Conservation Objectives for Cummeen Strand SPA [IE0004035] Version 1.
NPWS (2013) Conservation Objectives for Killala Bay/Moy Estuary SPA [IE0004036] Version 1.
NPWS (2022) Generic Conservation Objectives for Lough Gara SPA [IE0004048] Version 9.
NPWS (2022) Generic Conservation Objectives for Lough Arrow SPA [IE0004050] Version 9.
NPWS (2022) Generic Conservation Objectives for Lough Derg (Shannon) SPA [IE0004058] Version 9.
NPWS (2022) Generic Conservation Objectives for Lough Ree SPA [IE0004064] Version 9.
NPWS (2022) Generic Conservation Objectives for Inishmurray SPA [IE0004068] Version 9.
NPWS (2012) Conservation Objectives for River Shannon and River Fergus Estuaries SPA [IE0004077] Version 1.
NPWS (2022) Generic Conservation Objectives for River Little Brosna Callows SPA [IE0004086] Version 9.
NPWS (2022) Generic Conservation Objectives for Middle Shannon Callows SPA [IE0004096] Version 9.
NPWS (2022) Generic Conservation Objectives for Ballykenny-Fisherstown Bog SPA [IE0004101] Version 9.
NPWS (2022) Generic Conservation Objectives for Bellanagare Bog SPA [IE0004105] Version 9.
NPWS (2022) Generic Conservation Objectives for Inishduff SPA [IE0004115] Version 9.
NPWS (2013) Conservation Objectives for Ballysadare Bay SPA [IE0004129] Version 1.
NPWS (2022) Generic Conservation Objectives for Aughris Head SPA [IE0004133] Version 9.
NPWS (2022) Generic Conservation Objectives for Ardboline Island and Horse Island SPA [IE0004135] Version 9.
NPWS (2012) Conservation Objectives for Donegal Bay SPA [IE0004151] Version 1.
NPWS (2022) Generic Conservation Objectives for Sligo/Leitrim Uplands SPA [IE0004187] Version 9.
NPWS (2022) Generic Conservation Objectives for Lough Conn and Lough Cullin SPA [IE0004228] Version 9.
NPWS (2022) Generic Conservation Objectives for Ballintemple and Ballygilgan SPA [IE0004234] Version 9.

The assessment considers available conservation objectives. Since conservation objectives focus on maintaining the favourable conservation condition of the QIs/SCIs of each site, the screening process concentrated on assessing the potential effects of the Plan against the QIs/SCIs of each site. The conservation objectives for each site were consulted throughout the assessment process.

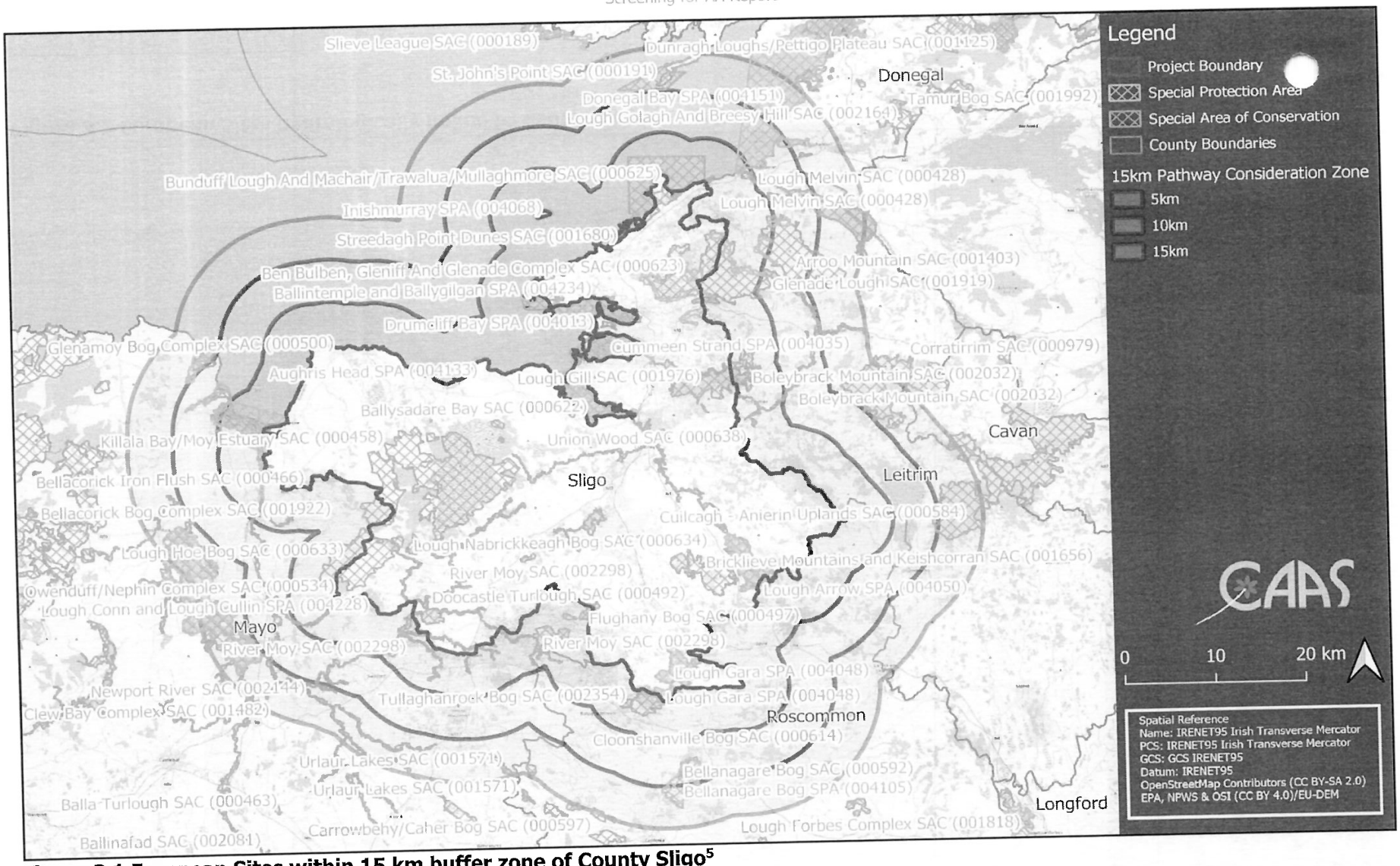


Figure 3.1 European Sites within 15 km buffer zone of County Sligo[5]

[5] Source: NPWS (datasets downloaded January 2023)

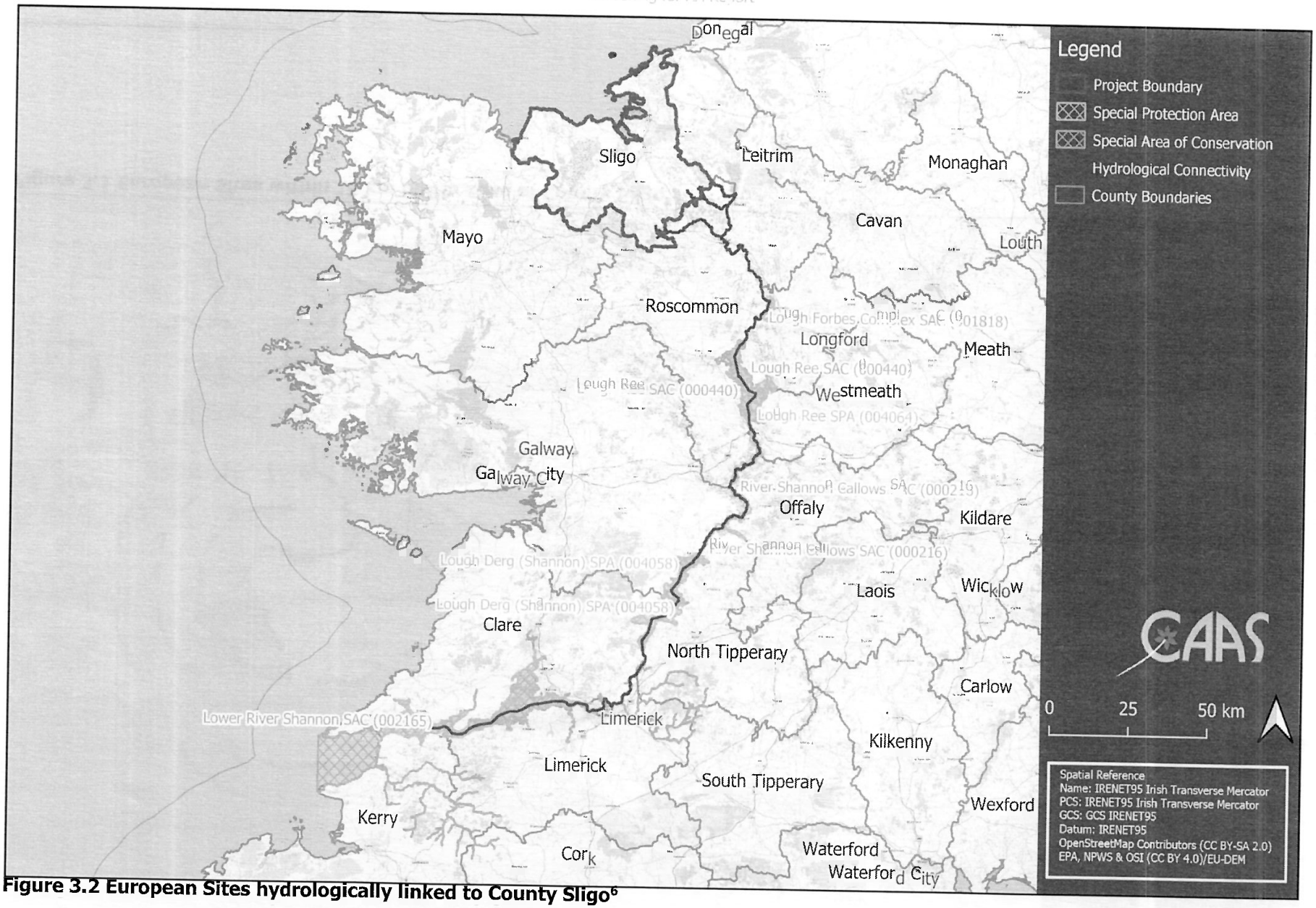


Figure 3.2 European Sites hydrologically linked to County Sligo[6]

[6] Source: NPWS (datasets downloaded January 2023)

3.3 Assessment Criteria and Screening

3.3.1 Is the Plan Necessary to the Management of European Sites?

The overarching objective of the Plan is not the nature conservation management of the sites, but to guide the sustainable economic and community development of the County to 2030[7]. Therefore, the Plan is not considered to be directly connected with or necessary to the management of European sites.

3.3.2 Elements of the Plan with Potential to Give Rise to Effects

Implementing the Sligo 2030 Plan will involve Sligo County Council helping to facilitate, promote, support and coordinate stakeholders in their activities in a way that is consistent with existing and emerging plans setting out public policy for sustainable development, including that relating to the economy, communities, infrastructure, land use tourism and environmental protection and environmental management.

The Plan is situated alongside this hierarchy of statutory documents that has been subject to environmental assessment/screening for environmental assessment, as appropriate, and forms the decision-making and consent-granting framework. The Plan does not provide consent, establish a framework for granting consent or contribute towards a framework for granting consent; the Plan is not binding on Sligo County Council when undertaking its functions with respect to whether or not to grant development consent for a project.

The Plan fully aligns with the provisions of the existing National Planning Framework, Ireland 2040, National Climate Action Plan 2023, Housing For All 2021, the Regional Spatial and Economic Strategy 2020-2032 and the current County Development Plan, all of which have been subject to legislative requirements relating to public consultation and environmental assessment/screening for environmental assessment. As such, the Plan is wholly subject to the requirements of the provisions set out in these documents (and any subsequent revisions to these documents), including provisions relating to sustainable development, environmental protection and environmental management that have been integrated into these documents, including through SEA and AA processes, and does not introduce any alterations or additions to those provisions. Furthermore, Sligo County Council has confirmed that the provisions of the Plan have already been provided for under existing plans/strategies/etc. that have already been subject to SEA/AA and/or Screening for SEA/AA.

In order to be realised, projects included in the Plan (in a similar way to other projects from any other sectors) will have to comply, as relevant, with various legislation, policies, plans and programmes (including requirements for lower-tier Appropriate Assessment, Environmental Impact Assessment and other licensing requirements as appropriate) that form the statutory decision-making and consent-granting framework, of which the Plan is not part and does not contribute towards.

Therefore, the Plan does not introduce any additional sources for effects that were not already considered by the existing planning framework and associated AA processes.

3.3.3 Screening of Sites and Types of Potential Effects

Table 3.1 examines whether there is potential for effects on European sites considering information provided above, including Appendix I. Sites are screened out based on one or a combination of the following criteria:

- Where it can be shown that there are no significant pathways such as hydrological links between the Plan and the site to be screened;
- Where the site is located at such a distance from that area to which the Plan relates those effects are not foreseen; and
- Where it is that known threats or vulnerabilities at a site cannot be linked to potential impacts that may arise from the Plan.

As outlined in 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"* outlines the types of effects that may affect European Sites.

[7] Note that the Plan is not binding on Sligo County Council when undertaking its functions with respect to whether or not to grant development consent for a project.

These include effects from the following activities:

- Land take
- Resource Requirements (Drinking Water Abstraction Etc.)
- Emissions (Disposal to Land, Water or Air)
- Excavation Requirements
- Transportation Requirements
- Duration of Construction, Operation, Decommissioning

In addition, the guidance document outlines the following likely changes that may occur at a designated site, which may result in effects on the integrity and function of that site:

- Loss/reduction of habitat area;
- Habitat or species fragmentation;
- Disturbance to key species;
- Reduction in species density;
- Changes in key indicators of conservation value (water quality etc.); and
- Climate change.

Assessment of potential impacts on European Sites is conducted utilising a standard source-pathway model.

Each of these potential changes are considered below and in Table 3.1 with reference to the QIs/SCIs of all of the European sites identified

Oifig an Rialaitheora Pleanála
Office of the Planning Regulator

OPR Ref: DP-029-22

22nd December 2023

Sligo County Council,

County Hall,

Riverside,

Sligo,

F91 Y763.

Re: Draft Sligo County Development Plan 2024-2030

A chara,

Thank you for your authority's work in preparing the Draft Sligo County Development Plan 2024-2030 (the draft Plan).

The Office of the Planning Regulator (the Office) wishes to acknowledge the considerable work your authority has undertaken in the preparation of the draft Plan against the backdrop of an evolving national and regional planning policy and regulatory context.

As your authority is aware, a key function of the Office is the assessment of statutory plans to ensure consistency with legislative and policy requirements relating to planning.

The Office has evaluated and assessed the draft Plan under the provisions of sections 31AM(1) and 31AM(2) of the *Planning and Development Act 2000*, as amended (the Act), and this submission has been prepared accordingly.

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

4ú hUrlár, Teach na Páirce, 191-193A An Cuarbhóthar Thuaidh, Baile Átha Cliath 7, D07 EWV4.
4th Floor, Park House, 191-193A North Circular Road, Dublin 7, D07 EWV4.
T +353 (0)1 854 6700| E info@opr.ie | W www.opr.ie

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 considers that the draft Plan generally sets out a well balanced approach for the future development of the county, with appropriate focus on the continued growth and development of Sligo Town as a Regional Growth Centre, and in a manner that promotes compact growth and regeneration.

The inclusion of a specific chapter which outlines how the draft Plan addresses the Regional Policy Objectives related to the Regional Growth Centre Strategic Plan in the Regional Spatial and Economic Strategy for the Northern and Western Region (RSES) also provides a strong framework to support the critical role of the town in the wider county and region.

The Office also strongly commends the planning authority's efforts to support regeneration which is evident from the approach in the draft Plan and the implementation of major regeneration projects including Cranmore Regeneration and public realm interventions such as O'Connell Street and Queen Maeve Square. The Office encourages the planning authority to further explore land activation measures with assistance from the Urban Regeneration and Development Fund along with other funding streams which will be critical for the enhancement Sligo Town's attractiveness and prioritisation of urban-led development.

The Office commends the planning authority for preparing a Local Transport Plan (LTP) which includes specific actions and measures to support the integration of land use and transport planning and active travel, including policy commitments to enhance the county's accessibility through sustainable transport measures, which in

turn respond to the need to reduce emissions from transport in respect of climate action.

The Office has identified a relatively small number of areas which require further consideration in order to more fully align the development framework for the county with current national and regional policies.

In this regard, the Office considers that there may be scope to direct additional population growth to Sligo Town to better reflect the population targets in the RSES and the need to develop a centre of scale.

The planning authority will also be aware of the need to address matters within the scope of section 10(2)(n) of the Act in relation to climate change. In this regard, the Office welcomes the inclusion of a dedicated chapter on climate action in the draft Plan. The Office notes that objective O-REN-1 commits to preparing a renewable energy strategy consistent with the *Sligo County Council Draft Climate Action Plan 2024-2029*. While this is welcomed, the Office considers that the strategy should be prepared within one year of the publication of the Methodology for Local Authority Renewable Energy Strategies and should include a review of the landscape character map. in the draft Plan. Further, it is considered there is scope for the draft Plan to include additional policy support and direction for renewable energy generation in appropriate locations.

The Office has also identified a number of issues relating to flood risk management which will need to be addressed prior to the adoption of the Plan.

Other matters raised by way of observations generally relate to minor matters that can be clarified or addressed through the plan process.

It is within this context the submission below sets out five (5) recommendations and seven (7) observations under the following 9 themes:

Key theme	**Recommendation**	**Observation**
Core strategy and settlement strategy	Recommendation 1 Recommendation 2	Observation 1

Housing strategy and relevant policies	Recommendation 3	Observation 2
Economic development and employment	-	Observation 3
Sustainable transport and accessibility	-	Observation 4 Observation 5
Climate action and renewable energy	Recommendation 4	-
Flood risk management	Recommendation 5	-
Environment, heritage and amenities	-	Observation 6
Implementation and monitoring	-	Observation 7

1. Sligo Regional Growth Centre

The development of the Sligo Regional Growth Centre as a driver of growth in the region is a central objective the RSES and of the Sligo Regional Growth Centre Strategic Plan (SRGCSP).

In this regard, the Office welcomes the level of detail provided in Chapter 4 in response to the challenges and opportunities identified for the SRGCSP area. In particular, the draft Plan identifies strategic areas that have significant growth potential and where critical support infrastructure exists or is planned, including the Docklands, the Cranmore Regeneration Project, the Centre Block (Wine Street Car Park), the Courthouse Block and the Quay Quarter. The regeneration of these sites will be a catalyst for economic and residential regeneration for the north-west region.

The inclusion of a zoning map and objectives for Sligo Town is strongly welcomed and will provide a strong policy framework for the preparation of a future local area plan.

The Office is satisfied that the draft Plan provides a high level of consistency with the SRGCSP in the RSES.

2. Core strategy and settlement strategy

2.1 Housing and population targets

The Office considers that the total county population projections for the plan-period, as set out in Table 3.2 of the draft Plan, are broadly consistent with the population prescribed for the county in the RSES and the *Implementation Roadmap for the National Planning Framework* (2018).

The Office is generally satisfied that the housing supply target (HST) contained in Table 5.2 of the draft Plan is in compliance with the *Housing Supply Target Methodology for Development Planning, Guidelines for Planning Authorities* (2020). Notwithstanding, the Office considers that the HST figure for the plan-period should be reviewed as our assessment indicates that the figure may need to be adjusted upwards.

While there may be a need to revise the housing supply target, the Office notes from Table 3.2 that there is sufficient zoned residential lands to accommodate any minor adjustment, and that the rezoning of additional land would not be required. Furthermore, any additional HST increase should be directed to Sligo Town in the first instance having regard to RPO 3.7.37 and the transitional population target figure in Table 3 of the RSES.

The core strategy allocates 2,512 housing units or approximately 65% of the HST allocation to Sligo Town which is considered appropriate having regard to its designation as a Regional Growth Centre and to RPOs 3.1 and 3.7.38. While the draft Plan zones sufficient land to accommodate 2,952 units, the Office considers the overall zoning approach for residential development in Sligo Town to be acceptable.

In relation to population growth targets in the core strategy, it has a 2030 population target of 23,800 for Sligo Town, which is an increase of 3,192 persons. Table 3 of the RSES has a transitional population target of 26,000 people by 2031 and a population uplift of 8,000 people by 2040.

Since the core strategy's population target to 2030 would not reach the transitional population target for 2031 in Table 3 of the RSES, the Office considers that, there is

scope for the draft Plan to show more ambition in relation to population growth in Sligo Town, having regard to RPOs 3.7.37 and 3.7.38, and the further alignment with NPO 2b, NPO 2c and NPO 5.

The outcome of these changes would be to give greater effect to the draft Plan's stated core strategy guiding principles for compact growth and rejuvenation of the Sligo Regional Growth Centre, acting as an economic driver for the region, and also further improve alignment and consistency with regional policy objectives contained in the SRGCSP.

Recommendation 1 – Population and housing targets

Having regard to the:

- *Housing Supply Target Methodology for Development Planning, Guidelines for Planning Authorities* (2020);
- the population growth targets for Sligo Town under RPO 3.7.37 and RPO 3.7.38; and
- the transitional population target for Sligo Town in 2031 contained in Table 3 of the RSES,

the planning authority is required to review the housing supply target figures in Table 5.2 of the draft Plan in consultation with the Office and the Department of Housing, Local Government and Heritage.

The planning authority is advised that should the adjusted housing supply target figure increase, any additional surplus should be allocated to Sligo Town to provide for a greater level of population ambition to 2031 consistent with the Regional Spatial and Economic Strategy.

2.2 Settlement Hierarchy and distribution of growth

The proposed settlement hierarchy, including the identification of Sligo Town as the Regional Growth Centre, is consistent with the settlement typology approach set out

in section 4.5.1 of the *Development Plans, Guidelines for Planning Authorities* (2022) (the Development Plans Guidelines).

The Office acknowledges that the Regional Growth Centre designation is a key part of the *National Planning Framework* (NPF) strategy to build up stronger regions. with centres of scale that are more accessible and competitive, including at an international level.

The Office accepts the designation of Ballymote, Enniscrone and Tobercurry as Support Towns and second tier settlements in the settlement hierarchy. The Office agrees with the approach outlined in section 3.2.1 of the core strategy to provide *'...for consolidation, regeneration and a quantum of growth proportional to their current population and infrastructural capacity.'* Moreover, the Office welcomes policy objective SP-S-2 which is consistent with NPO 18a and RPO 3.4 and will ensure that these settlements will serve this part of the north-west as an accessible centre of employment and services which can be a driver for investment and growth of regional scale and influence. The Office notes that collectively, the core strategy allocates 11.4% of the overall HST allocation to the three second tier settlements, which is considered appropriate in respect of their infrastructural capacity.

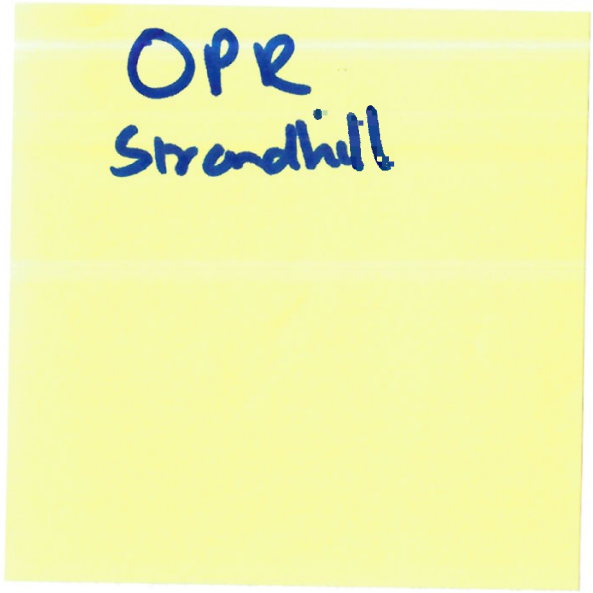
The third tier is occupied by the Satellite Villages of Ballysadare, Collooney, Coolaney, Grange and Strandhill. The Office agrees with the approach outlined in the core strategy, which is to *'carefully manage development, prioritising the provision of adequate service infrastructure, recreational and community facilities.'* In this regard, the Office acknowledges that the core strategy allocation for this tier is 370 units, which amounts to an average allocation of 74 units per village and is considered appropriate in light of the recent significant population increases and limited services.

The fourth tier contains the villages with special coastal tourism functions (a role shared with Enniscrone and Strandhill), and the core strategy supports the provision of adequate infrastructure for sustainable tourism development in these villages. In this regard, the core strategy allocates 70 units to this tier which amounts to an average allocation of 23 per village and is considered appropriate.

Tier.

23 per village

74 units per village


OPR
Strandhill

The fifth tier contains 19 villages sustaining rural communities and are supported through the core strategy to cater for limited local needs in terms of residential development. The sixth tier contains the unserviced villages and dispersed settlement in rural areas. The combined core strategy allocation for Tiers 5 and 6 is 495 units or 12.7% of the total and is considered appropriate.

From the evaluation undertaken by the Office, it is evident that the distribution of population growth across the settlement hierarchy generally reflects the policies and objectives of the NPF and RSES on compact growth and reversal of rural decline in villages, as set out in NPOs 3, 6, 7, 9, 16, 18a and RPOs 3.1, 3.2. 3.4 and 3.13.

2.3 Residential development – compact growth and sequential approach

Compact growth and the sequential approach to development are fundamental NPF policy objectives, highlighting the need to identify infill and brownfield opportunities to intensify housing and employment development within the existing built-up footprint of settlements. The approach for Sligo includes the potential to achieve more homes and jobs in the urban core of Sligo Town, and its support towns (Tier 2 settlements), through high quality and higher density mixed use development and continued support of existing services and infrastructure, thus facilitating people to live and work within reasonable distances.

The Office welcomes the inclusion in the draft Plan, of appropriate average residential densities for each town and village having regard to the NPF. the *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas: Cities, Towns & Villages* (2009) and subsequent *Circular Letter NRUP 02/2021*.

Moreover, the Office commends the planning authority's approach in section 3.3.2 of the core strategy setting out how the draft Plan proposes to address any excess of zoned lands for residential development consistent with the Development Plans Guidelines. In this regard, the planning authority has retained the most suitable (highest scoring) sites identified in the infrastructural assessment for future residential and mixed use development and designated such lands as settlement

southern extent of the rural areas under urban influence as presented on the core strategy map, the Office advises the planning authority to monitor rural housing activity in the area extending along the recently upgraded N4 national road scheme to Castlebaldwin.

4.2 Social and Affordable Housing

It is noted that strategic housing policy SP-HOU-2 includes a 20% requirement for social housing with no specific percentage requirement for affordable housing. The wording differs from the policy recommended in section 8.2 of the Housing Strategy which states:

> *Reserve 20% of eligible sites which are subject to new residential development (or a mix of uses including residential) for the development of social / affordable housing units, in accordance with the Housing Strategy and the requirements of Part V of the Planning and Development Act 2000 (as amended).*

The planning authority is advised to review the above to ensure there is no inconsistency.

5. Economic development and employment

5.1 Employment zoned land

A significant number of the county's jobs are concentrated in Sligo Town and Environs which has become the county's centre for industry and enterprise, with a particular strength in the area of chemicals and pharmaceuticals.

The draft Plan correctly acknowledges that in order for Sligo Town to meet its population growth targets, further job creation and economic development will be required to support its role as a regional economic driver in the north-west. In this regard, the zoning map for Sligo and Environs provides strategic employment land at Oakfield and Ballytivnan the latter of which is accessible from the recently constructed Western Distributor Road.

consolidation sites. In accordance with the Development Plans Guidelines, less centrally-located lands with a live planning permission for residential development were designated as additional provision sites, which is welcomed.

The Office welcomes section 11.2.1 which, as recommended in the Development Plans Guidelines, lists the sites which have been selected to contribute to compact growth in Sligo Town and environs, together with their potential housing and population yields. This includes Settlement Consolidation Sites (SCS) and Additional Provision Sites (AP).

The Office welcomes that all SCS, infill and AP sites are located largely within the 2016 Census boundary for Sligo Town, and that over 50% of the potential housing yield can be delivered within the settlement's built up footprint, which exceeds the 40% requirement of RPO 3.7.39.

Further to the above, the Office also notes that there are two sites with a combined area of 81.5 hectares which have the potential for significant residential development to be built over a timescale greater than a single six-year development plan-period, and having regard to their strategic location and development potential. These lands are appropriately designated as Long-Term Strategic and Sustainable Development Sites consistent with the recommendations of section 4.4.4 of the Development Plans Guidelines.

The planning authority's overall approach to zoning and designation of lands for settlement consolidation, infill/ brownfield, and compact growth is considered acceptable and consistent with section 1.3.5 of the Development Plans Guidelines.

The Office welcomes the approach in the Support Towns of Ballymote, Enniscrone and Tobercurry which includes the identification of sites which would contribute to compact growth. The Office notes that all SCS sites and the AP sites are located largely within the 2016 Census boundaries for the three settlements and there is potential to accommodate in excess of the 30% requirement for future housing within the built up footprint consistent with RPO 3.2(c).

The Office notes that the draft zoning map for Grange zones a significant site as Strategic Land Reserve on the western approach to the village. The site is zoned Green Belt in the Sligo County Development Plan 2017-2023 and the infrastructure assessment indicates that the lands are not fully serviced. The lands would not promote compact growth or consolidation and are not required to meet the settlement's housing allocation. The Office considers that the Green Belt zoning should be retained for the forthcoming plan period.

Recommendation 2 - Zoning of land for Strategic Land Reserve in Grange

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;
- NPO 3c and RPO 3.2, compact growth;
- NPO 72a-c and associated NPF Appendix 3, tiered approach to zoning;
- the infrastructural assessment in Appendix A of the Draft Sligo County Development Plan 2023-2029; and
- the *Development Plans, Guidelines for Planning Authorities* (2022) in respect of the policy and objective for the sequential approach to zoning,

the planning authority is required to omit the Strategic Land Reserve zoning from the site on the L3203 on the western approach to the village and retain the Green Belt zoning.

2.4 Residential land use zoning – infrastructural assessment

It is an objective of the NPF that planning authorities implement a tiered approach to zoning (NPO 72a-c). The detailed requirements of this approach are set out under Appendix 3 of the NPF and are further elaborated upon under section 4.5.2 of the Development Plans Guidelines and supported by a policy objective. NPO 72a-c provides that where the zoning of land for development cannot be serviced within the lifetime of the plan, the lands should not be zoned for development.

The Office acknowledges that the planning authority carried out an infrastructural assessment of existing undeveloped zoned lands in towns and villages which have a land use zoning plan. The assessment helpfully considered the availability of service infrastructure and transport infrastructure that would allow the development of lands immediately or during the plan-period.

The Office notes that the outcome of the infrastructural assessment and settlement capacity audits confirmed that there is an excess of fully serviced, undeveloped, zoned land in Sligo Town and county. In the interests of achieving compact growth, the planning authority has retained the most suitable sites for future residential and mixed use development and designated same as SCS and in Sligo Town only which is welcomed.

The Office's assessment of the zoning maps for Sligo Town, Ballymote and Enniscrone notes some discrepancies regarding the maps in the infrastructural assessment as follows:

- lands zoned BIE at Ballytivnan and Finisklin, and zoned RW at Carrowroe in Sligo Town have not been categorised in section A.2 of the infrastructural assessment. These lands are all inside the development limit for Sligo Town and are only partly developed with remaining pockets of greenfield sites.
- there appears to be a discrepancy between the zoning map for Ballymote and the infrastructure assessment. Site IA7 has a SLR-2 compact growth designation and is shown inside the development limit in the infrastructure

assessment, however the site is zoned Green Belt and is located outside the development limit on the zoning map.

- the infrastructure assessment categorises the land south of the proposed new road corridor in Enniscrone as Tier 1, however the other larger site zoned Tourism and undeveloped is not categorised in the infrastructure assessment.

Observation 1 – Infrastructure assessment maps

Having regard to the co-ordination of land use zoning, infrastructure and services, and in particular to:

- NPO 72a, NPO 72b and NPO 72c, tiered approach to zoning; and
- the *Development Plans, Guidelines for Planning Authorities* (2022), policy and objective for settlement capacity audits and associated infrastructural capacity assessment,

the planning authority is requested to:

(i) review section A.2 of the infrastructural assessment to ensure that lands zoned for employment / retail uses in Sligo Town are categorised in terms of their serviceability; and

(ii) review the zoning maps and maps included in the infrastructural assessment to ensure they are consistent with each other in respect of sites identified for development.

3. Housing strategy and relevant policies

3.1 Traveller accommodation

The Office welcomes the overall approach to Traveller accommodation in the draft Plan which includes two policies and one objective specifically relating to accommodation for Travellers and identifies specific locations on Map 2 – Sligo Town Draft Objectives Map. The Office considers that the requirements of section 10(2)(i) of the Act have therefore been adequately met.

3.2 Community and social infrastructure

The Office welcomes the community and social Infrastructure section of the draft Plan which has a key role to play in the creation of a healthy and inclusive community. The Office notes that the development of effective social and community infrastructure is supported through the zoning and strategic objectives included in the town and village plans. Furthermore, the Office understands that a flexible and supportive approach will be adopted towards proposals for community facilities on suitable sites within other zoning categories (e.g. Residential / Mixed Uses / Industry / Enterprise). The Office welcomes the intention to direct any such proposal to be locations within the development limits of settlements, which will support active travel and sustainable settlements.

That being said, the Office notes that the Community Facilities zoning permits a wide range of uses including, among others, schools, data centres, hotels, offices, light industry, and residential (apartment and residential – houses). The Office notes that the objective of the Community Facilities zoning is to *'Protect existing facilities or retain existing uses and provide for the establishment of new/additional community and institutional uses, such as schools, community centres, health centres etc.'*

In this regard, the Office considers that the range of uses normally permitted or open for consideration on the Community Facilities zoning should be curtailed especially regarding residential / commercial / employment uses to better reflect the intent of the zoning objective.

Recommendation 3 – Community Facilities: Land Use Zoning Approach

Having regard to the:

- the objective of the Community Facilities zoning;
- the range of uses normally permitted and open for consideration within the Community Facilities zoning as provided for in the Land Use Zoning Matrix in Chapter 10;
- National Strategic Outcome 10 - Access to Quality Childcare, Education and Health Services; and
- section 6.2.1 of the *Development Plans, Guidelines for Planning Authorities* (2002) for zoning in the development plan,

the planning authority is required to review the range of uses normally permitted and open for consideration within the Community Facilities zoning and amend the land use zoning matrix to not normally permit uses which are incompatible with the primary objective of the zone such as residential and commercial / employment development.

Alternatively, the planning authority could provide an appropriate policy framework for the consideration of development proposals through the development management system.

As stated above, the core strategy provides a clear strategy for the growth of Sligo Town consistent with population and housing targets identified for the settlement in the RSES. In light of this, the Office considers it prudent to consult with the Department of Education regarding the potential need for additional schools to support the Plan's ambition for substantial residential growth across Sligo Town.

Observation 2 – School provision in Sligo Town
Having regard to: • section 10(2)(j) of the *Planning and Development Act 2000*, as amended; • National Strategic Outcome 10 - Access to Quality Childcare, Education and Health Services; • sections 2.5.1 and 6.2.6 of the *Development Plans, Guidelines for Planning Authorities* (2022); and • the housing allocation for Sligo Town in the core strategy and its population and housing targets for the settlement in the RSES; the planning authority is requested to review the need for school provision in Sligo Town in consultation with the Department of Education.

4. Housing and regeneration

4.1 Rural housing policy

The draft Plan recognises the long tradition of people living in rural areas in a highly dispersed rural pattern and the significant number of people who commute to Sligo Town for employment purposes.

The Office notes that section 5.5.1 of the draft Plan (Settlement Strategy) outlines the types of rural areas and policy provisions in respect of each. In this regard, the core strategy map makes a distinction between rural areas located within the hinterland of Sligo Town (rural areas under urban influence) and elsewhere (remote rural areas).

The Office welcomes the inclusion of a Green Belt zoning outside the identified development limit for settlements. Such an approach provides a clear focus for the consolidation of growth and a distinction from the open countryside while also reducing pressure for ribbon development on the periphery of settlements.

The rural areas under urban influence include the settlements such as Collooney, Strandhill, Ballygawley and Coolaney (among others). While the Office accepts the

Beyond Sligo Town and Environs, the Office notes that the towns of Tobercurry, Collooney and Grange, have developed a variety of smaller enterprises staffed by a local workforce including Strandhill which has a purpose built enterprise centre within relatively close proximity to the airport. The Office welcomes the policies outlined in Chapter 28 which relate to business, industry and enterprise, particularly policy P-BIE-1 to support the consolidation of existing business / enterprise parks through their extension and/or the provision of new enterprise centres in Ballymote, Enniscrone and Tobercurry in addition to Strandhill. The Office further welcomes policy P-BIE-3 which seeks to support the repurposing of vacant buildings in town centres for office-based enterprises.

5.2 Retail

The Office welcomes the retail development standards as well as the general principles in relation to assessing retail proposals and the sequential approach to retail development as set out in sections 33.5.2 and 33.5.3. Chapter 8 of the draft Plan sets out Sligo's Retail Strategy.

In relation to the Retail Hierarchy, County Sligo is considered 'mono-nodal' in terms of its retail offering largely concentrated in Sligo Town, which is placed on the Regional (second) tier. Beyond Sligo Town itself, the towns of Tobercurry, Ballymote and Enniscrone have some significance in respect of their retail provision given their location and role as support towns within the Settlement Hierarchy. The Office welcomes the indication as set out in the draft Plan which provides a comprehensive retail strategy.

On a minor point, there appears to be a discrepancy in the Land Use Zoning map regarding the appropriate zoning objective for Sligo Retail Park. In this regard, the planning authority should review and confirm what the proposed land use zoning objective is for these lands and accurately display this on zoning map for Sligo Town.

Observation 3 – Retail
The planning authority is requested to revise the Sligo Town Draft Land Use Zoning Map – Map 1 to ensure that the zoning objective for the Sligo Retail Park is accurately displayed on Map 1.

6. Sustainable transport and accessibility

The Office is satisfied that the draft Plan contains sufficient policy support for integrated land use and transport planning, active travel and measures to support reducing emissions related to transport. The Office supports the policies and objectives to protect the strategic transport function of the national road network and to implement the road projects identified as strategically important in the RSES, including the Eastern Garavogue Bridge and Approach Roads Scheme. The planning authority should ensure that these strategic routes are clearly identified on all zoning maps in the draft Plan for transparency.

Given the largely rural nature of the county and its extensive national road network, the Office considers that there is merit in providing a cross reference to policy P-NR-1, which seeks to protect the traffic carrying capacity of national roads, in section 26.4 (Housing in Rural Areas) and Chapter 28 (Economic Development). This would provide clarification and early assistance to applicants in the preparation of planning applications where there may be implications for the strategic national road network in the area.

The Office notes the Land Use Zoning map for Collooney shows a road corridor for the N17 road scheme, however, Chapter 13 – Collooney Village Plan does not include an associated strategic policy or objective regarding same. The Office advises the planning authority to include an appropriate policy / objective in Chapter 13 to reference the N17 Knock to Collooney Scheme and to safeguard the scheme pending its delivery.

Observation 4 – National Roads

Having regard to:

- National Strategic Outcome 2 – Enhanced Regional Accessibility;
- Chapter 2 – Development Planning and Roads of the *Spatial Planning and National Roads Guidelines for Planning Authorities* (2012); and
- Policy P-NR-1 of the Draft Sligo County Development Plan 2024 – 2030, which seeks to protect the traffic carrying capacity of national roads;

the planning authority is requested to:

(i) provide a cross reference to policy P-NR-1 in section 26.4 (Housing in Rural Areas) and Chapter 28 (Economic Development) of the draft Plan; and

(ii) include an appropriate policy / objective in Chapter 13 to reference the N17 Knock to Collooney Scheme and to safeguard the scheme pending its delivery.

The Office welcomes the preparation of an LTP in tandem with the preparation of the draft Plan. The Office supports the actions and measures set out in the LTP which reflect the planning authority's preferred transport infrastructure improvements and proposals over the plan period and Strategic Objective SO-TRA-5 which integrates these principles into the draft Plan.

It is considered however, that some positive aspects of the LTP, particularly the modal share aspirations in Figure 4-4 and performance indicators and target aspirations[1] (page 101) should be translated into policies / objectives in the draft Plan.

Further, the planning authority should consider translating further specific measures / proposals from the LTP into the draft Plan to give them statutory weight and clarity on the settlement zoning maps.

[1] Shift 10% of private car trips to alternative modes by 2027 increasing to 20% by 2030

Observation 5 – Integration of Local Transport Strategy

Having regard to:

- section 10(2)(n) of the *Planning and Development Act 2000*, as amended, concerning sustainable settlement and transport strategies;
- RPO 6.27 and 6.28; and
- National Strategic Outcome 5 on sustainable mobility, and NPO 27, NPO 54 and NPO 64,

the planning authority is requested to:

(i) include policies / objectives in the draft Plan to translate the modal share aspirations in Figure 4-4 and performance indicators and target aspirations (page 101) from the Local Transport Plan (LTP);

(ii) review the LTP and consider translating further specific measures / proposals from the LTP into the draft Plan to give them statutory weight and clarity on the settlement zoning maps; and

(iii) provide an effective monitoring regime for the implementation of the planning authority's sustainable transport strategy and the modal share targets in particular.

7. Climate action and renewable energy

7.1 Climate action

The Office supports the Climate Action Framework set out in Chapter 2 of the draft Plan, which outlines the planning authority's commitment and obligations to address climate change in accordance with the *Climate Action Plan 2023* (Climate Action Plan).

The Office acknowledges the planning authority's commitment to prepare a Local Authority Climate Action Plan which is underway and the requirement for the draft Plan to align with the Local Authority Climate Action Plan. The Office welcomes Policy SP-CA-2 in this regard.

The Office also welcomes Table 2.1 Envisaged Climate Action effects of the Development Plan, which outlines the climate adaption and mitigation effects of the draft Plan provisions.

The embedding of climate action and the integration of climate mitigation and adaption measures through development management polices (Policy SP-CA-3) is also supported and welcomed by the Office.

7.2 Renewable energy

The preparation of the draft Plan provides an opportunity for the planning authority to demonstrate leadership on climate action and set out local roadmaps to deliver on national emissions reduction targets.

In this regard, the draft Plan should play a significant role in reducing the county's carbon footprint, through the creation of less energy and travel-intensive patterns of development, facilitation of energy generation from low carbon sources, and the adaptation of communities to the effects of climate change.

The planning authority will be aware that the Climate Action Plan Guidelines recently launched by the Minister for the Environment, Climate and Communications require planning authorities to exercise a strong link between spatial planning and positive climate action to ensure that land-use planning and development integrates considerations of adaptation and mitigation. In this respect, the Office welcomes the preparation of the Draft Local Authority Climate Action Plan 2024-2029 and the intent to prepare a renewable energy strategy.

While the Office welcomes the inclusion of a specific chapter on climate action and policies supporting renewable energy such as P-EN-2, the Office considers that additional policy and direction to promote a broad spectrum of renewable development is required, including in the core strategy and greater clarity in the development management standards (Chapter 33). The planning authority is advised that the Leitrim County Development Plan 2023-2029 provides a good example of a positive approach to climate action and renewable energy development.

The Office notes the identification of key issues and implications including the growing need to develop large renewable energy projects in Chapter 1 of the draft Plan. A Renewable Energy Strategy has not, however, been prepared as part of the draft Plan.

The planning authority will be aware of the forthcoming Methodology for Local Authority Renewable Energy Strategies which is due to be published in 2024. In this regard, the Office acknowledges the commitment to developing a renewable energy strategy for County Sligo during the lifetime of the draft Plan (Objective O-REN-1).

However, having regard to the urgent need to meet national targets for renewable energy under the Climate Action Plan, the Office considers that a firmer commitment to prepare the Strategy is required.

Furthermore, the Office notes that the landscape character map, which will inform the renewable energy strategy dates from 1996, and will also need to be reviewed as part of that process.

Recommendation 4 - Renewable Energy Strategy

Having regard to the national requirement for a sustainable renewable energy supply and the transition to a low carbon and climate resilient society, and in particular:

- section 10(2)(n) of the *Planning and Development Act 2000,* as amended;
- the importance attributed to climate action by Government policy, as evidenced by, inter alia, the recent *Climate Action and Low Carbon Development (Amendment) Act 2021*, the *Climate Action Plan 2023;*
- NPO 54 to integrate climate action into the planning system in support of national targets for climate policy mitigation and adaptation objectives, as well as targets for greenhouse gas emissions reductions;
- NPO 55 to promote renewable energy use and generation at appropriate locations;

- RPO 4.17 to position the region to avail of the emerging global market in renewable energy;
- the forthcoming Methodology for Local Authority Renewable Energy Strategies;
- the *Development Plans, Guidelines for Planning Authorities (2022);* and
- the *Wind Energy Development Guidelines (2006),*

the planning authority is required to:

(i) amend objective O-REN-1 in Chapter 31 of the draft Plan to commit to the preparation of a renewable energy strategy for the county and to a variation of the County Development Plan to incorporate its recommendations into the adopted Plan within one year of the publication of the Methodology for Local Authority Renewable Energy Strategies;

(ii) the landscape character map in the draft Plan which dates from 1996 should be reviewed in tandem with the preparation of the renewable energy strategy;

(iii) include additional policies / objectives in the draft Plan which support a broad spectrum of renewable energy developments; and

(iv) provide additional policy direction for renewable energy development in the draft Plan including the development management standards in Chapter 31 consistent with the policies and guidelines referenced above.

8. Flood risk management

The Office welcomes the preparation of a Strategic Flood Risk Assessment (SFRA) to accompany the draft Plan and the supportive policies and objectives to mitigate flood risk, including P-FRM-2 and P-FRM-5.

The Office also acknowledges and supports the identification of flood risk zones as a key informant to the land use zoning in the draft Plan. However, while site specific

maps have been illustrated in the SFRA to show which lands are at risk of flooding, these have not been overlaid on the land use zoning maps. It is difficult therefore to fully understand the implications of flood risk across the draft Plan area, and the planning authority is advised to overlay the future scenario mapping on the land use zoning maps in order to provide clarity on areas at risk from climate change.

In addition, there appears to be some errors in the transposing of the flood risk datasets into the Flood Zones such as small omissions of areas and the use of the incorrect probability extents. For example, the full extent of the flood risk area affecting the Business, Industry and Enterprise (BIE) lands at Ballytivnan does not appear to be shown. The planning authority should review and compare the flood mapping and the probability extents for all areas, in consultation with Office of Public Works (OPW) including specific sites at Ballinacarrow, Ballincar, Ballygawley, Ballymote, Ballysadare, Castlebaldwin, Cliffony, Geevagh, Gorteen, Grange, Rathcormac, Sligo Town, and Strandhill.

Recommendation 5 - Flood Risk Management

Having regard to flood risk management, and in particular,

- NPO 57 requiring implementation of *The Planning System and Flood Risk Management Guidelines for Planning Authorities* (2009) and integration of sustainable water management solutions; and
- RPO 3.10, flood risk management and integration of sustainable water management solutions,

the planning authority is required to:

i. overlay the flood zones maps and future scenario maps with the land use zoning maps in the draft Plan; and

ii. review and amend the flood zone maps to ensure the correct datasets and probability extents have been illustrated. In instances where the flood extents encroach into incompatible land use zonings, a Justification Test should be prepared in accordance with the Flood Guidelines. Where lands

Flood Risk
Strandhill

WATER.

fail to meet the criteria of the Justification Test, the planning authority must rezone lands for water compatible or appropriate uses only. Particular attention is required for the specific sites identified by the OPW including lands at Ballinacarrow, Ballincar, Ballygawley, Ballymote, Ballysadare, Castlebaldwin, Cliffony, Geevagh, Gorteen, Grange, Rathcormac, Sligo Town, and Strandhill.

The planning authority is advised to liaise with the OPW to address this recommendation.

9. Environment, heritage and amenities

The Office welcomes the inclusion a number of policies and objectives in the draft Plan for the protection and conservation of the county's built heritage including archaeological sites, architectural conservation areas and protected structures as set out in Chapter 24.

The Office welcomes the inclusion of Appendices B–H which include buildings of note, designated scenic routes, designated nature conservation areas, biodiversity sites, geological heritage sites, national monuments and public rights of way. In particular, the Office commends the planning authority for the inclusion of Appendix H as well as the associated mapping which clearly illustrates the public rights of way.

That being said, following a review of Appendix B Buildings of Note, there appears to be a discrepancy in the numbering for sites identified within the settlement of Ballysadare whereby BoN No. 7 appears to have been omitted from the schedule. It is therefore unclear if this is administrative error or if there is an additional building of note that has been left out of the associated schedule. In this regard, the planning authority should review the Buildings of Note schedule and ensure that all sites have been included and appropriately numbered in Appendix B.

Rezoning
WATER
Strandhill

Observation 6 – Built Heritage

Having regard to

- section 10(2)(f) of the *Planning and Development Act 2000*, as amended, concerning protection of natural and built heritage; and
- National Strategic Outcome 7 - Enhanced Amenities & Heritage,

the planning authority is requested to review Appendix B to ensure that an accurate schedule of all Buildings of Note is included in the draft Plan and nothing has been omitted in error.

10. Environmental Assessments

The Office notes the preparation of the Strategic Environmental Assessment (SEA) and Natura Impact Report (NIR), attached to the draft Plan, in accordance with statutory requirements.

In relation to Appropriate Assessment, the Office notes the conclusion of the NIR, which states

> *Having incorporated mitigation measures into the Draft Plan, it has been demonstrated that the Draft Plan is not foreseen to give rise to any significant adverse effects to designated European sites, alone or in combination with other plans or projects.*

With regard to the SEA, the structure of the report prepared is consistent with the guidance set out in the *Strategic Environmental Assessment, Guidelines for Regional Assemblies and Planning Authorities* (2022).

11. Implementation and monitoring

The Office notes that no provision has been made for monitoring the implementation of the draft Plan. The inclusion of a clear monitoring strategy of key plan objectives

will enable the planning authority to be more effective in implementing the draft Plan, including considering the obligations under section 15 of the Act.

The Office advises that implementation and monitoring would be best to focus on the anticipated or proposed key outcomes of the draft Plan, as determined by the planning authority, such the core strategy e.g. housing delivery and population growth in Sligo Town.

In this regard, section 10.3 of the Development Plans Guidelines sets out guidance on the best practice for meaningful monitoring of plan-implementation through core strategy monitoring and plan objective monitoring. The Office considers the approach taken in the Limerick Development Plan 2022-2028 to be good practice.

Observation 7 – Implementation and monitoring
Having regard to section 10.3 of the *Development Plans, Guidelines for Planning Authorities* (2022), the Office advises the planning authority to include a monitoring strategy for implementation of the draft Plan.

Summary

The Office requests that your authority addresses the recommendations and observations 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.

In accordance with section 12(5)(aa), where the planning authority decides not to comply with any of the Office's recommendations made in the draft Plan and report, they shall inform the Office, by notice in writing containing the reasons for the decision.

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 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.

Is mise le meas,



Anne Marie O'Connor

Deputy Regulator and Director of Plans Evaluations

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

Flood Risk management

Ministerial Direction Strandhill

8 November 2024

For the Attention of: Mr. Martin Lydon, Chief Executive

Sligo County Council,
County Hall,
Riverside,
Sligo
F91 Y763

Section 31 of the Planning and Development Act 2000
Notice of Intention to issue a Direction to Sligo County Council
regarding the Sligo County Development Plan 2024-2030

Dear Martin,

Consequent to a recommendation made to me as Minister by the Office of the Planning Regulator (the Office) on 27 October 2024 in connection with the Sligo County Development Plan 2024–2030, as adopted by the elected members of Sligo County Council on 30 September 2024, and pursuant to section 31 of the Planning and Development Act 2000 (as amended) (the Act), I write to give notice of my intention to issue a direction to Sligo County Council to take certain measures specified in this notice.

Opinion

On consideration of the recommendation made to me by the Office, I have formed the opinion that:

(i) Sligo County Council, in making the development plan, has failed to implement recommendations made to it, as planning authority, by the Office under section 31AM of the Act;

(ii) The Plan, as made, fails to set out an overall strategy for the proper planning and sustainable development of the area;

(iii) The Plan is inconsistent with national and regional policy objectives specified in the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy for the Northern and Western Region (RSES);

(iv) The Plan, as made, is not in compliance with the requirements of the Act.

Oifig an tAire Stáit atá freagrach as an Rialtas Áitiúil agus Pleanáil
Minister of State for Local Government and Planning

Teach an Chustaim, Baile Átha Cliath, D01 W6X0
Custom House, Dublin, D01 W6X0
T +353 1 888 2405 | ministerofstate@housing.gov.ie
www.gov.ie/housing

A draft of the Direction accompanies this notice and I request that you publish notice of this draft Direction, no later than two weeks after receipt of this notice. The reasons for the Direction are set out in the Statement of Reasons incorporated in the attached draft Direction and further detail is provided in the Summary of Issues as set out below.

Amended April 2024

Process to Date

The draft Sligo County Development Plan 2024–2030 (the draft Plan) was on public display from 13 October to 22 December 2023. The Office of the Planning Regulator made a submission to the draft Plan on 22 December 2023, containing five (5) recommendations which addressed a broad range of issues.

The elected members, having considered the draft Plan and the Chief Executive's Report on submissions received (March 2024), resolved to amend the draft Sligo County Development Plan 2024–2030 on 22 April 2024.

The material alterations to the draft Plan were on public display from 7 June 2024 to 5 July 2024. The Office made a submission on 5 July 2024 containing eight (8) recommendations. The Office's recommendations at the Material Alterations stage included:

- MA Recommendation 1, 2, 3 and 4 – Zoning of land for residential use
- MA Recommendation 5 – Zoning of land for non-residential use
- MA Recommendation 6 – Access to national roads
- MA Recommendation 7 – Greenways and recreational infrastructure
- MA Recommendation 8 – Flood Risk Management

The elected members of Sligo County Council resolved to make the Sligo County Development Plan 2024–2030 at a council meeting on 30 September 2024. Subsequently, the planning authority issued a notice letter under section 31AM(6) of the Act to the Office advising of the making of the Development Plan and specifying the recommendations of the Office that were not complied with.

Having reviewed the Chief Executive's reports on the draft Plan and material alterations to the draft Plan, the notice of the making of the Development Plan and the reasons in the notice letter, the Office has concluded that, with the exception of the items below, the recommendations of the Office have been responded to and have been addressed to the satisfaction of the Office, or are otherwise considered satisfactory within the legislative and policy context. The outstanding matters, therefore, relate to the following:

- Residential zoning objectives and material amendments
  (Recommendation 2, MA Recommendations 1, 2, 3 and 4)

- Material amendments to zone land for employment generating uses, tourism uses, and community facilities
  (MA recommendation 5)

- Access to National roads
  (MA Recommendation 6)

- Flood risk management
  (MA Recommendation 8)

Summary of Issues

OPR Recommendation 2 and MA Recommendations 1, 2, 3 4 and 8

Having regard to the core strategy of the draft Plan; national and regional policy objectives for compact growth; tiered approach to zoning and flood risk management; the provisions of the Development Plans Guidelines for Planning Authorities (2022); The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009); and section 10(2)(n) of the Act, the planning authority was required to make the Plan without certain specified amendments to residential land use zonings.

Notwithstanding the above, the elected members decided to make a significant number of the amendments referred to in the Office's submission, contrary to your recommendations as Chief Executive.

Having carefully considered the elected members' reasons, as set out in the section 31AM(6) notice submitted, the Office accepted the rationale provided by the elected members for their decisions in a number of cases. However, with respect to lands identified in sections 2(a)(i) and 2(b)(i) to (xiii) and 2(b)(xv) to (xviii) of the enclosed draft Direction, the Office has concluded that the zonings are inconsistent with objectives of national and regional planning policy, and fail to have regard to Ministerial planning guidelines under section 28 of the Act. Please see the statement of reasons incorporated in the draft Direction for specific details in this regard.

OPR MA Recommendation 5

Having regard to the provision of employment locations that can support compact and sustainable development; national and regional policy objectives for compact growth, tiered approach to zoning, flood risk management; the provisions of the Development Plans Guidelines for Planning Authorities (2022); The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009); the Spatial Planning and National Roads Guidelines (2012); and section 10(2)(n) of the Act, the planning authority was required to make the Plan without certain specified amendments to non-residential land use zonings in Enniscrone, Ballysadare and Easky.

Notwithstanding the above, the elected members decided to make a number of the amendments referred to in the Office's submission, contrary to your recommendations as Chief Executive.

Having carefully considered the elected members' reasons, as set out in the section 31AM(6) notice submitted, the Office has concluded that the amendments are inconsistent with objectives of national and regional planning policy, and fail to have regard to Ministerial planning guidelines under section 28 of the Act in respect to lands identified in sections 2(b)(xiv), (xix) – (xxi) of the enclosed draft Direction. Please see the statement of reasons incorporated in the draft Direction for specific details in this regard.

OPR Recommendation 6

Having regard to to national and regional policy objectives; the provisions of the Spatial Planning and National Roads Guidelines for Planning Authorities (2012), Sligo County Council was requested to make the Plan without MA PA-180 which proposed to insert additional text into the County Development Plan at section 33.9.1 Access onto National Roads, which provides for direct vehicular access onto national primary roads in certain circumstances.

It is noted that you as Chief Executive recommended to modify the text of PA 180 and to make the County Development Plan with the modified text. The elected members agreed with your recommendation and made the County Development Plan with the modified text.

It is also noted that Transport Infrastructure Ireland (TII) also separately requested the removal of this provision in its submissions to the planning authority, and that TII considers that the text included by PA 180 conflicts directly with the provisions of the section 28 Spatial Planning and National Road Guidelines, and strongly recommended that PA-180 is not adopted in the interests of adherence to the provisions of Government policy concerning

access to national roads and in the interests of road user safety on the high speed highly trafficked national road network.

Notwithstanding the above, the elected members proceeded to make the plan inclusive of the provision in question. National and regional policy objectives clearly indicate the importance of maintaining the strategic capacity and safety of the national roads network.

Please refer to the specific provisions referenced in the statement of reasons incorporated in the draft Direction for further details.

Decision

On review of the recommendation issued by the Office, corresponding documents and analysis, I, as Minister, am of the opinion to issue a draft Direction in relation to:

- Recommendation (2) a. (i),
- Recommendation (2) b. (i) to (xii),
- Recommendation (2) b. (xiv) to (xxi),
- Recommendation (2) c.

and in that regard, I refer you to the Statement of Reasons set out in the enclosed draft Direction.

I have decided not to issue a draft Direction in relation to Recommendation (2) b. (xiii) *(which relates to Material Alteration PAZ 60 in Easky*), which if accepted, would alter the 'New Residential (nRES)' zoning objective that applies to an area of land located in Easky, contrary to the decision of the elected members of Sligo County Council.

My reason for not issuing a draft Direction in respect of the Office's recommendations relating to PAZ 60 is set out below:

i. The subject lands are Tier 1 serviced lands and were zoned for residential use in the Sligo County Development Plan 2017-2023.

Accordingly, the zoning of these lands for new residential uses is reasonable in the circumstances.

In light of my decision you will note that there are consequent changes to the numbering of section 2) of the draft Direction as issued, which now reads (2) b. (i) to (xx).

Noting the aforementioned, I, as Minister, consider that the plan as made:

- is not in compliance with the provisions of the Act including:
  - Section 10(1), which requires the development plan to set out an overall strategy for the proper planning and sustainable development of the area.
  - Section 10(1A) which requires that the development objectives in the development plan are consistent with national and regional development objectives.
  - Section 10(2)(n) of the Act concerning the promotion of sustainable settlement and transport strategies and the obligations under the Climate Action Plan and the Low Carbon Development Act 2015.
  - Section 27(1), which requires the planning authority to ensure that when making a development plan, that the plan is consistent with any regional spatial and economic strategy in force for its area.
  - Section 28, as the statement under section 28(1A)(b) that is appended to the development plan fails to include information which demonstrates that the planning authority has formed the opinion that it is not possible to implement the policies and objectives of the Minister contained in the Development Plans Guidelines (2022), the Spatial Planning and National Roads Guidelines (2012) and the Flood Risk Management Guidelines (2009); because of the nature and characteristics of the area, in addition to the reasons for the forming of that opinion contrary to section 28(1B)(b).

- is inconsistent with objectives of the National Planning Framework, in particular NPO 3c (Compact Growth), NPO 18a (Proportionate Growth), NPO 57 (Flood Risk Management), NPO 60 (Natural and Cultural Heritage), NPO 72a (tiered approach to zoned land), NPO 72b (cost of servicing lands), NPOc (Unserviced lands), NPO 74 (delivery of National Strategic Outcomes), and is also inconsistent with the National Strategic Outcome 1 (Compact Growth) and NSO 2 (enhanced regional accessibility, including the maintenance of the strategic capacity and safety of the national road network).

- is inconsistent with objectives of the Regional Spatial and Economic Strategy for the Northern and Western Region specifically RPO 3.2 (Compact Growth), RPO

3.7.39 (compact growth within Sligo's existing built up urban area), RPO 3.10 (Flood Risk Management), RPO 5.14 (cultural and built heritage), and RPO 6.5 (Strategic Capacity and Safety of National Roads).

- fails to have regard to Ministerial Guidelines issued under Section 28 of the Act (refer to pages 63 and 63 of the OPR s.31AM(8) notice letter), specifically:
    - Development Plans, Guidelines for Planning Authorities (2022);
    - Spatial Planning and National Roads, Guidelines for Planning Authorities (2012);
    - The Planning System and Flood Risk Management, Guidelines for Planning Authorities (2009)

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

Having regard to the matters set out above, the Development Plan fails to set out an overall strategy for the proper planning and sustainable development of the area and is not in compliance with the requirements of the Act.

Measures to be taken – Draft Direction

Accordingly, having considered the recommendation of the Office, I am issuing a draft Direction pursuant to section 31 of the Planning and Development Act 2000 (as amended), to direct Sligo County Council with regard to the Sligo County Development Plan 2024-2030.

In accordance with section 31AN(1) of the Act, having considered and taken account of the proposed draft direction submitted by the Office and the correction notice, the draft Direction as issued incorporates minor editorial amendments which are not material in nature and do not alter the substance of the Office's recommended draft direction (Point I of the Statement of Reasons incorrectly lists Ballintogher and Cliffony and this has now been amended accordingly).

The draft Direction sets out the following steps for the Planning Authority to take:

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.

Please note that in accordance with section 31(4)(c) and Section 31(6) of the Act, those parts of the Sligo County Development Plan 2024–2030 referred to in this notice shall be taken not to have come into effect, been made or amended.

Next Steps – Procedural requirements

I wish to draw your attention to the public consultation obligations under section 31 of the Planning and Development Act 2000 (as amended), and the initial requirement as Chief Executive, under section 31(7) to publish notice of the draft Direction no later than 2 weeks after receipt of this notice, stating that the draft Direction may be inspected as specified in the notice, for a period of not more than 2 weeks.

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.
Park House, 191-193A North Circular Road, Dublin 7, D07 EWV4.
T +353 (0)1 854 6700 | E info@opr.ie | W www.opr.ie

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

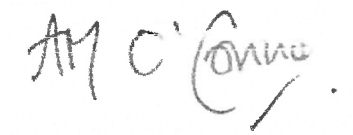
The Office requests that your authority addresses the recommendations outlined above. As you are aware, the report of the chief executive of your authority prepared for the elected members under section 12 of the Act must summarise these recommendations and the manner in which they will be addressed.

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.

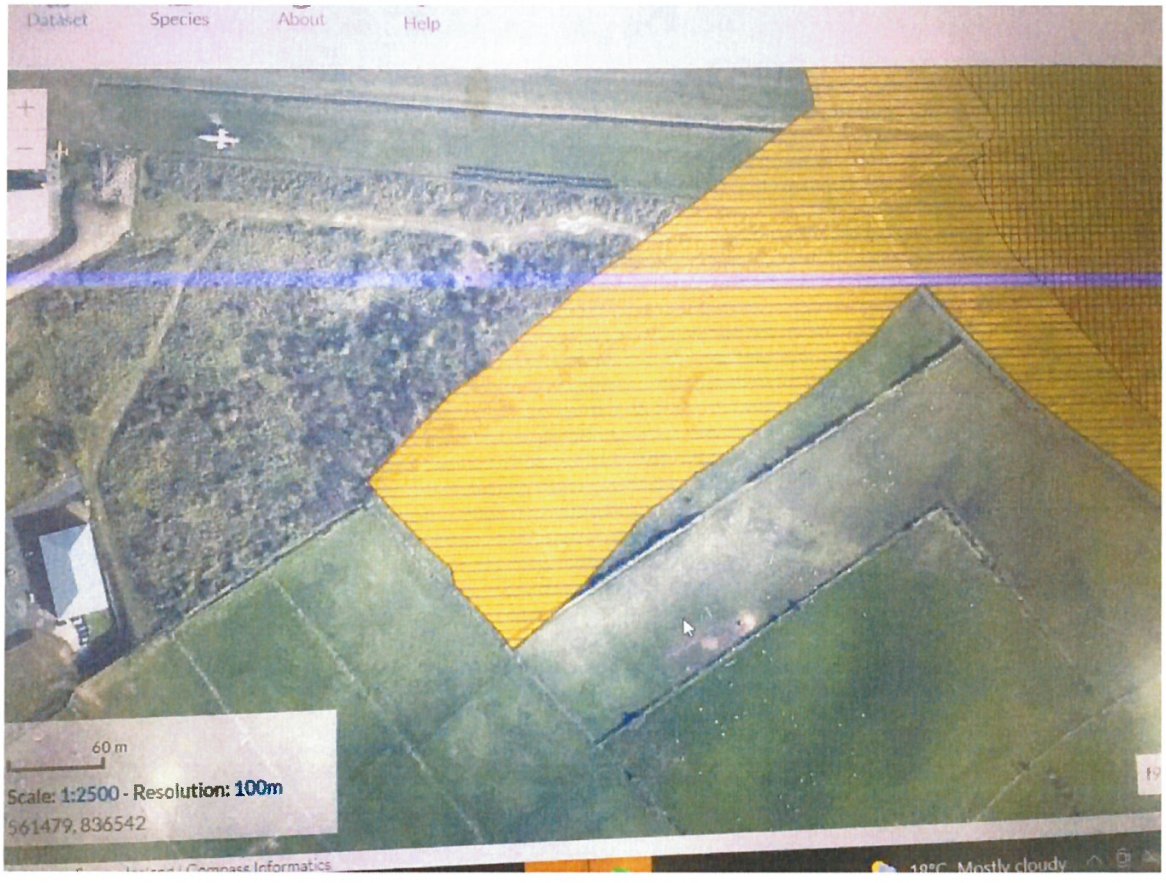
Other Annex I coastal habitats (Salicornia flats, ASM, MSM, vegetated shingle, annual vegetation of driftlines, dunes with Salix repens, humid dune slacks) were also recorded site by the Coastal Monitoring Project (CMP) (Ryle et al., 2009), Saltmarsh Monitoring Project (SMP) (McCorry & Ryle 2009) and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

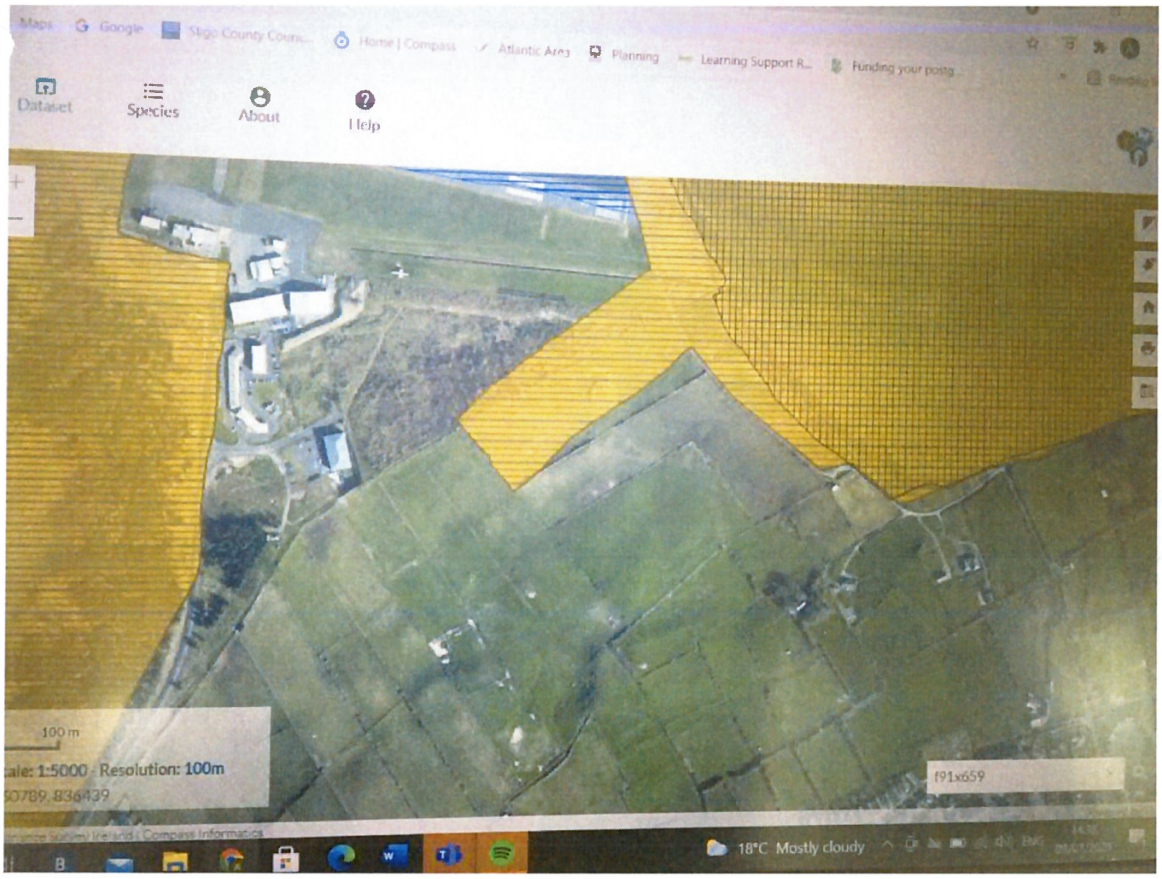
The targets set for the sand dune habitats are based primarily on the results of the Coastal Monitoring Project (CMP) (Ryle et al., 2009) .The CMP surveyed the following four sub-sites within Cumeeen Strand/Drumcliff Bay (Sligo Bay) SAC (Ryle et al., 2009): 1. Strandhill 2. Coney Island 3. Rosses Point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



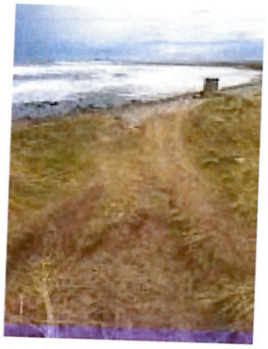
IMG_4910.JPG
1249K



IMG_4911.JPG
1430K



IMG_4912.JPG
1330K



IMG_4913.JPG
1502K



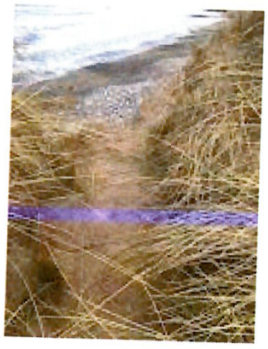
IMG_4914.JPG
1475K

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
1208K



IMG_4930.JPG
906K



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
1430K



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
1430K



IMG_8633.JPG
1240K



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

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



IMG_8639.JPG
1430K



IMG_8633.JPG
1240K



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

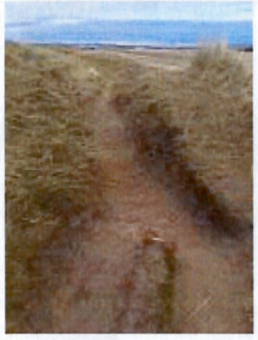


IMG_4922.JPG
1615K

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.

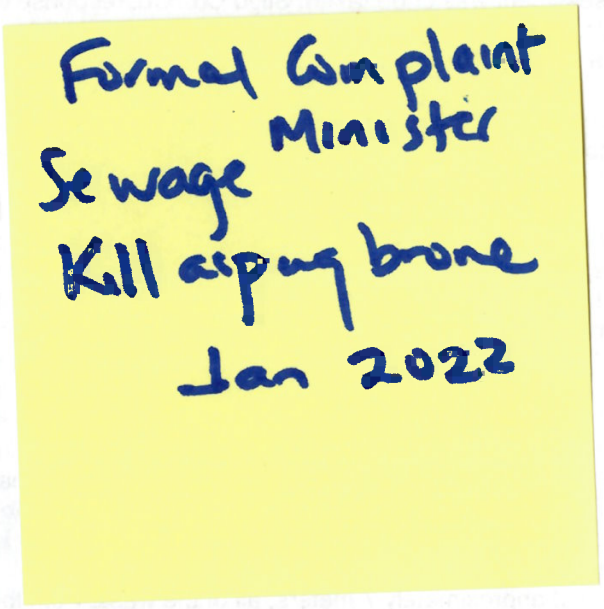
Sewage Treatment

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

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.

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.

Consent of copyright owner required for any other use. For inspection purposes only.

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	

For inspection purposes only.
Consent of copyright owner required for any other use.

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

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 intentionally 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.

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

---

4 attachments



IMG_8639.JPG
1430K



IMG_8633.JPG
1240K



IMG_8635.JPG
1130K

IMG_8637.MOV
8429K

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



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
1430K



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
1430K



IMG_8633.JPG
1240K



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

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



IMG_8639.JPG
1430K



IMG_8633.JPG
1240K



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 research 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.

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>

[Quoted text hidden]

4 attachments



IMG_8639.JPG
1430K



IMG_8633.JPG
1240K

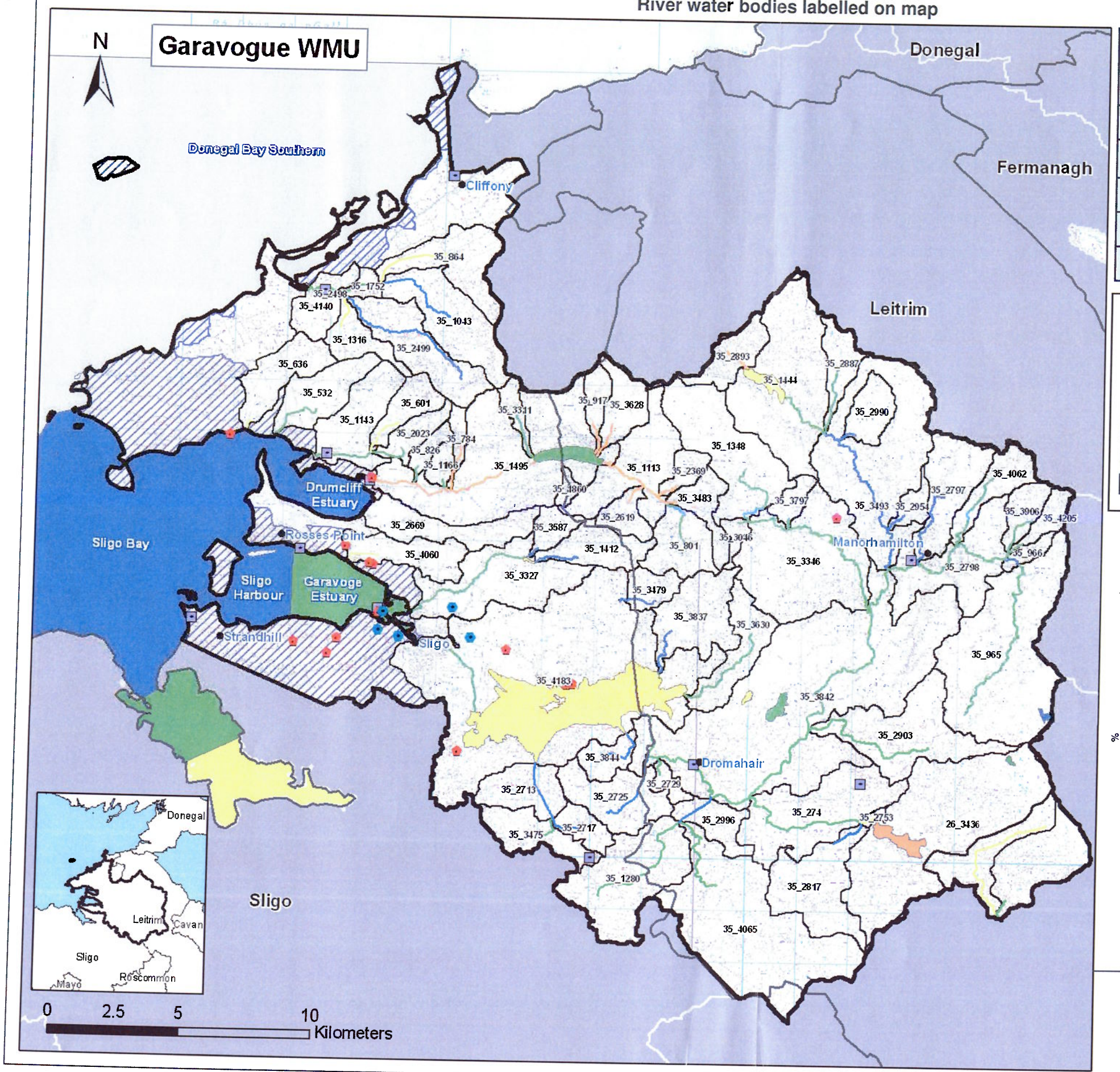


IMG_8635.JPG
1130K

IMG_8637.MOV
8429K

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

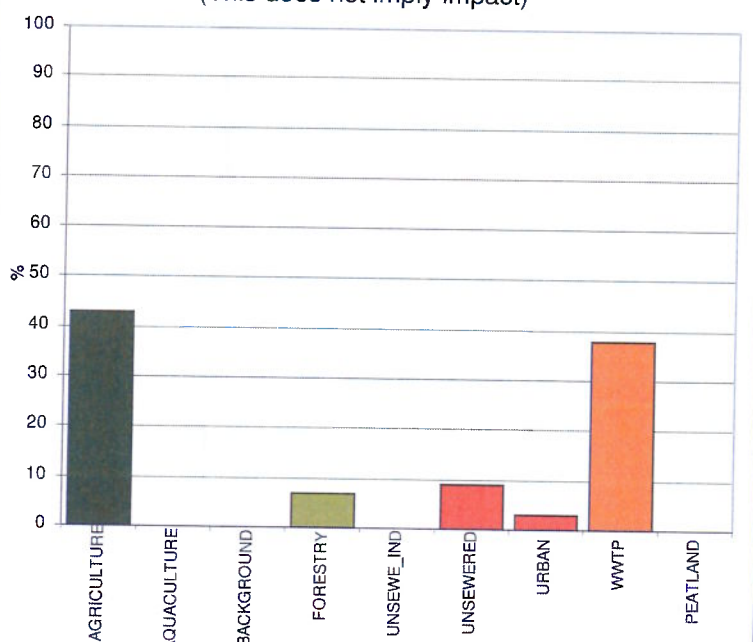
Legend

- 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)

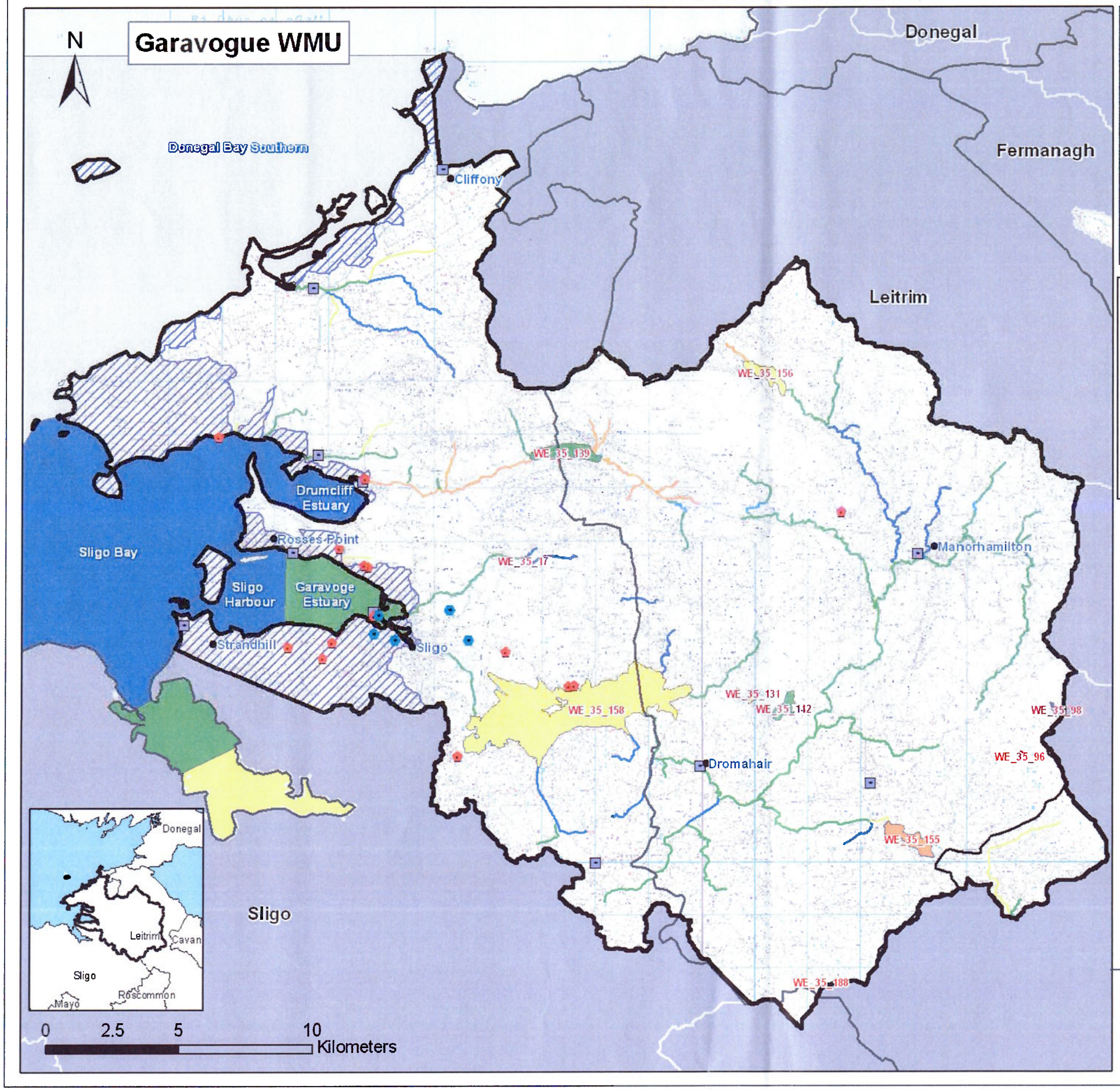


© Ordnance Survey Ireland. All rights reserved. Licence number 2010/15CCMA/Galway County Council.

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
Main Counties	Leitrim/Sligo
Number of river water bodies	66
Number of lake water bodies	10

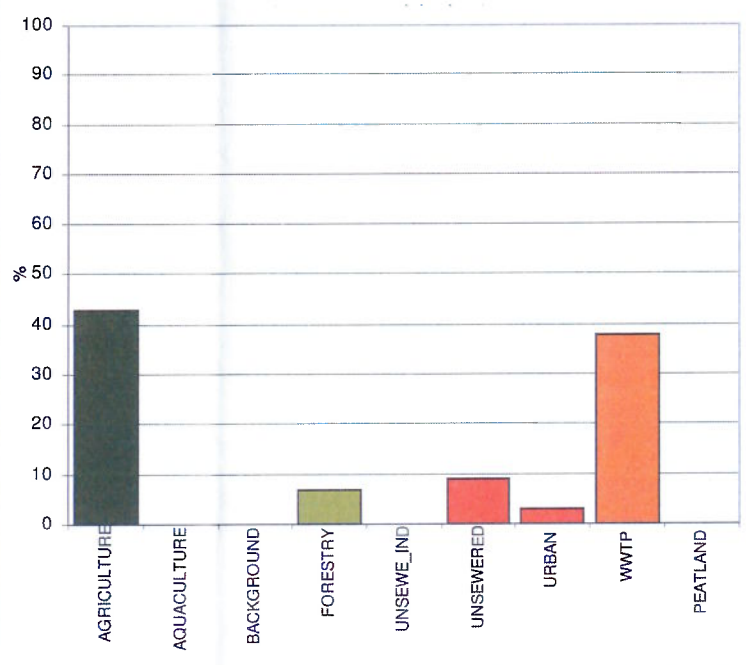
Legend

- 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)



© Ordnance Survey Ireland. All rights reserved. Licence number 2010/15CCMA/Galway County Council.

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.

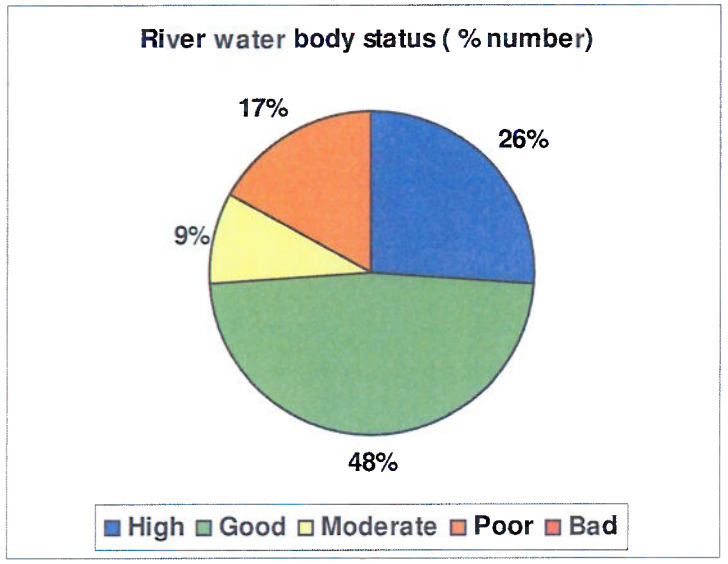
Garavogue Water Management Unit Action Plan

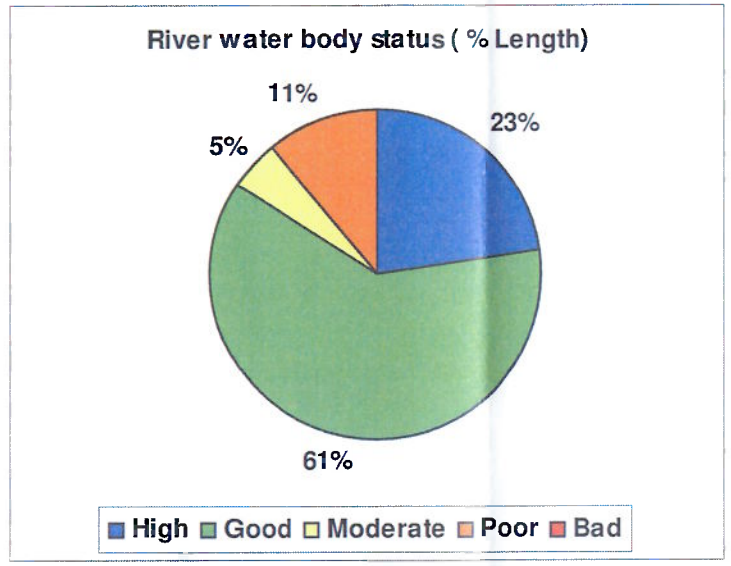
PRESSURES / RISKS	
Quarries, Mines & Landfills	5 quarries within WMU: 2 water bodies at risk from quarries within WMU: IE_WE_35_2499 and IE_WE_35_3842. 3 quarries in Leitrim: Quarry at Lurganboy – limestone extraction, readymix cement and block making, WE_35_3346. Kerrigans Quarry – limestone rock, readymix 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

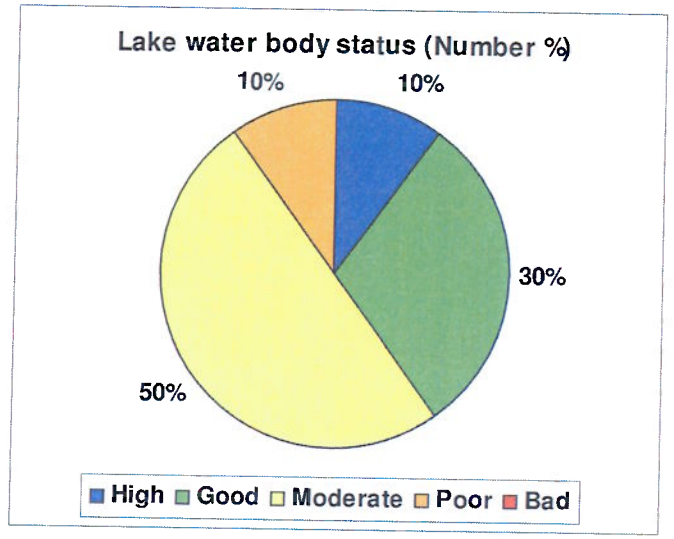
IE_WE_Garravogue																	
			Biological Elements				Supporting Elements					Protected Areas					
Member State Code	Monitored Y (Extrapolated N)	Donor Waterbody	Macroinvertebrates (Q)	FreshWater Pearl Mussel	Fish	Phytobenthos (Diatoms)	Morphology	Specific Polutants	Physio-chemical	Ecological Status	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

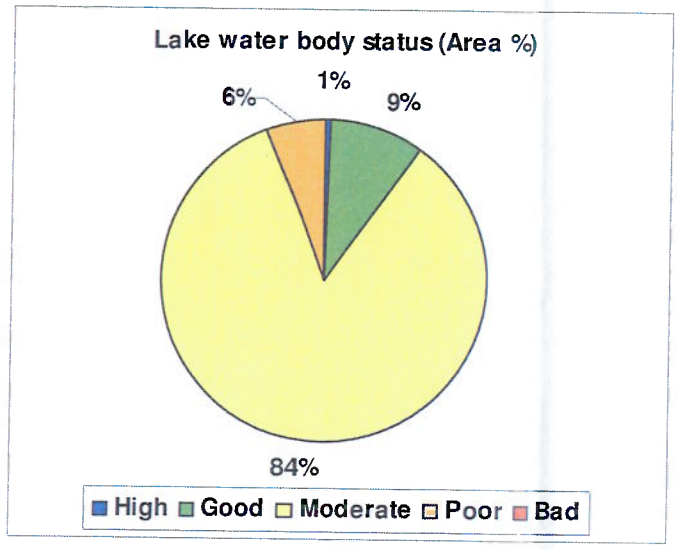
Garavogue Water Management Unit Action Plan

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

Contents

1. **Introduction**
   - 1.1. Background and Legislative Context
   - 1.2. Stages of the Appropriate Assessment
   - 1.3. Terminology

2. **Methodology**
   - 2.1. Approach
   - 2.2. Data Sources
   - 2.3. Consultation

3. **Stage 1 – Screening for Appropriate Assessment**
   - 3.1. Description of the Plan
   - 3.2. Screening of Amendments
   - 3.3. Sites Screened
   - 3.4. Screening Conclusion

4. **Finding of No Significant Effects Report Matrix**

5. **Relevant Documents and References**

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.

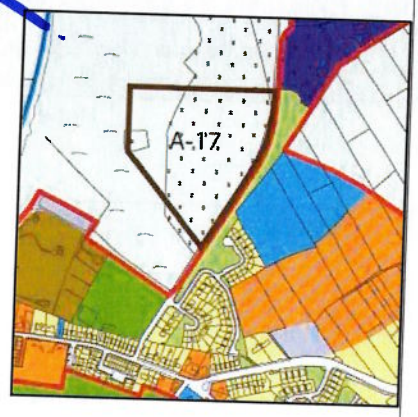
Two proposed amendments, A-11 and A-17, were not adopted by Sligo County Council as part of the CDP Variation No.1.Strandhill Mini-Plan. Rejected amendments are set out in Table 3 below. Consideration of the potential for these final changes to give rise to impacts on any Natura 2000 site is assessed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

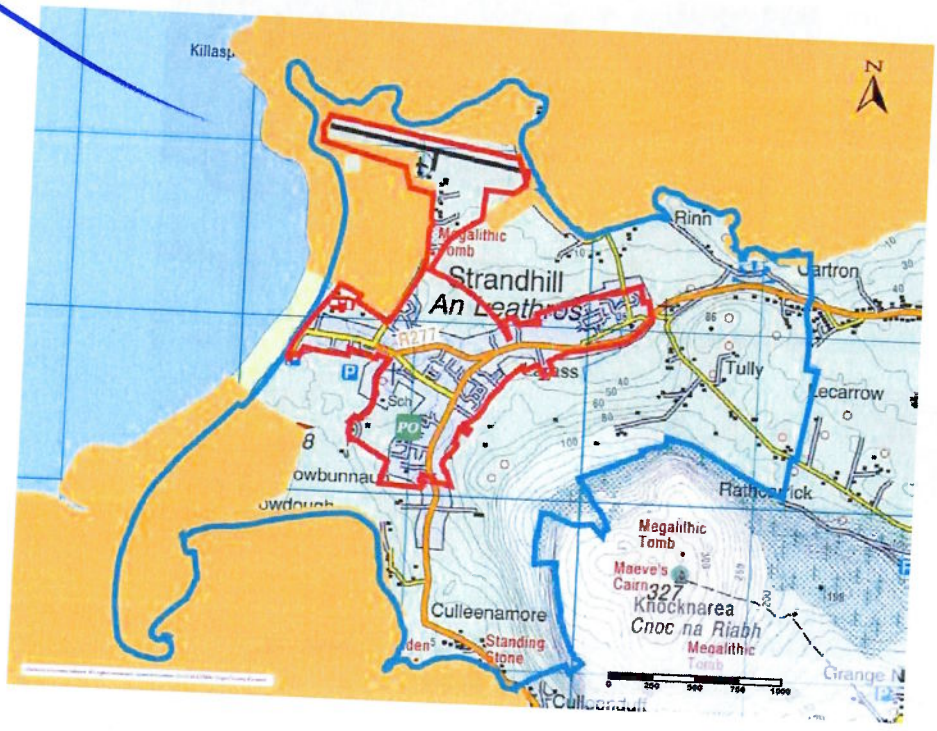


Fig. 2 Special Areas of Conservation immediately adjoining or within the Plan boundary.

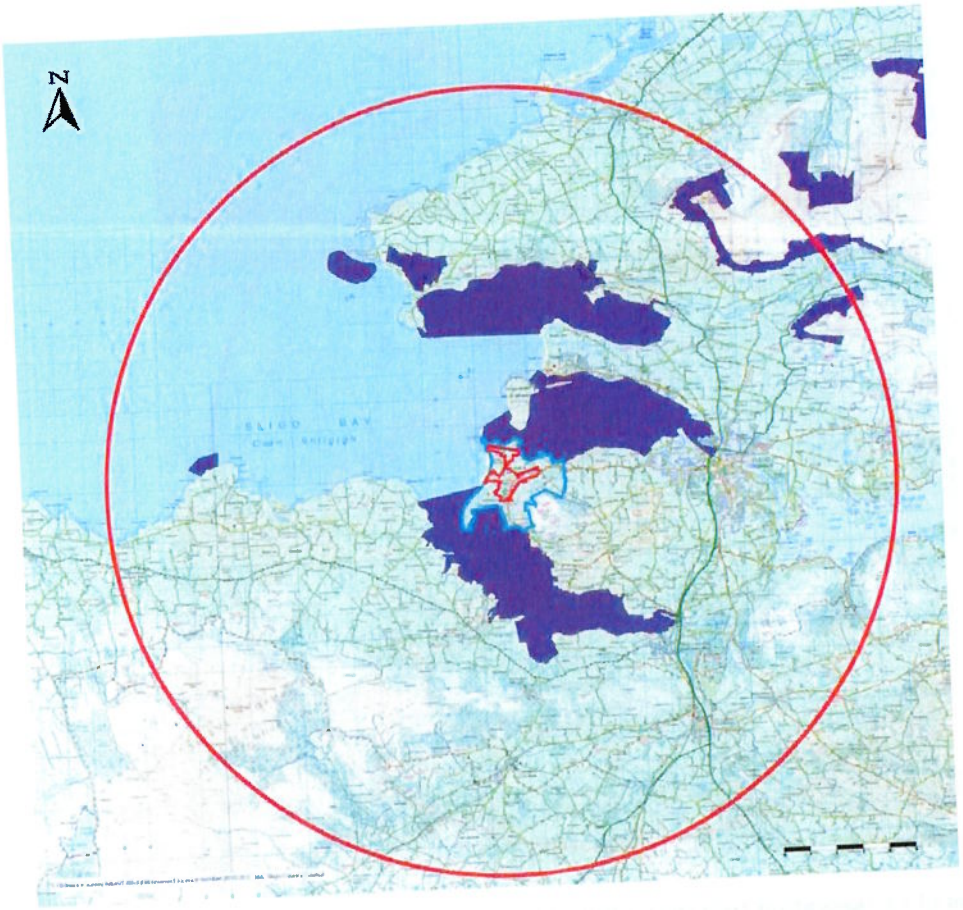


Fig. 3 Special Protection Areas (purple) within 15km (red circle) of Strandhill.



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

	E i-iii. Objectives re design and development standards for promenade site (MIX 1).	No impacts identified.	n/a
	F. Objective re urban design along Buenos Aires Drive (MIX 2 and MIX 3)	No impacts identified.	n/a
	G i-iii. Objectives re elements to be incorporated into development proposals for MIX 2 (existing Council car park).	No impacts identified.	n/a
	H. Objective re urban design for existing property at MIX 3.	No impacts identified.	n/a
	I i-ii. Objectives re urban design for development proposals at site MIX 4.	No impacts identified.	n/a
44.5 Transport, circulation and parking	A. Objective re land reservation for a New Airport Road.	Potential negative impact on Natura 2000 sites. Construction of New Airport Road has potential for negative impact on Natura 2000 sites due to site preparation, road construction, future management and use/introduction of invasive species. Future road development should be undertaken in consultation with NPWS, DAHG and should be subject to appropriate assessment at project level.	Cummeen Strand/Drumcliff Bay cSAC
	B. Objective to reserve land for the creation of New Burma Road.	No impacts identified.	
	C. Objective to extend Promenade in a northerly direction to link with existing airport road as indicated on the Objectives Map, while incorporating coastal protection measures.	Potential negative impact on Natura 2000 sites arising from promenade development and associated coastal protection measures. Initiatives which increase human use and access to the coastal zone have the potential to give rise to impacts on habitats and cause disturbance to birds and other	Cummeen Strand/Drumcliff Bay cSAC Ballysadare Bay cSAC

		species generally. At present there is erosion of the dune systems at Strandhill. The proposed transport hub at TRANS 2 will add further to existing recreational pressure on habitats and species. Construction of a promenade and link road have potential for negative impact on Natura 2000 sites due to construction, future management and use/introduction of invasive species and by increasing recreational pressure within Natura 2000 sites. Future promenade and link road development should be undertaken in consultation with NPWS, DAHG and should be subject to appropriate assessment at project level.	
	D. Objective re provision of footpaths and public lighting throughout the village.	No impacts identified.	n/a
	E. Objective to upgrade Golf Club Road.	No impacts identified.	n/a
	F. Objective requiring all new developments to provide for special mobility needs.	No impacts identified.	n/a
	G. Objective to improve traffic flow on existing promenade.	No impacts identified.	n/a
	H. Objective to reserve land along Burma Road for a Public Transport Node (TRANS 1).	No impacts identified.	n/a
	I. Objective re road junction improvements.	No impacts identified.	n/a
44.6 Community Facilities	A. Objective to support improvement and further development of existing sports facilities adjoining the Airport Road.	No impacts identified.	n/a

	B. Objectives requiring any proposed development of community facilities at the Greenfield site at CF1 to provide a range of facilities.	Potential negative impact on Natura 2000 sites. Construction of Community Facilities at CF1 has potential for negative impact on Natura 2000 sites due to site preparation, construction, future use and management and use/introduction of invasive species. Future development should be undertaken in consultation with NPWS, DAHG and should be subject to appropriate assessment at project level.	Cummeen Strand/Drumcliff Bay cSAC Cummeen Strand SPA
	C. Objective to require flood risk assessment for any proposed development at CF1.	No impacts identified.	n/a
44.7 Tourism Development	A. Objective to promote tourism related-infrastructure to increase visitor numbers and local employment.	Potential negative impact on Natura 2000 sites. Initiatives which increase human use and access to the coastal zone have the potential to give rise to impacts on habitats and cause disturbance to birds and other species generally. Future tourism related infrastructure development should be undertaken in consultation with NPWS, DAHG and should be subject to appropriate assessment at project level.	Cummeen Strand/Drumcliff Bay cSAC Ballysadare Bay cSAC Cummeen Strand SPA Ballysadare Bay SPA
	B. Objective to Provide a public parking and picnic area to the north of the caravan park in conjunction with the new road (TRANS 2).	Potential negative impact on Natura 2000 sites. Initiatives which increase human use and access to the coastal zone have the potential to give rise to impacts on habitats and cause disturbance to birds and other	Cummeen Strand/Drumcliff Bay cSAC Ballysadare Bay cSAC

		species generally. At present there is erosion of the dune systems at Strandhill from recreational use. The proposed transport hub at TRANS 2 will add further to existing recreational pressure on protected habitats and species. Future transport hub development should be undertaken in consultation with NPWS, DAHG and should be subject to appropriate assessment at project level. Obj 44.2 A (Coastal Management Plan) and Obj 44.7 C (Development of a Trail Network) will have positive impacts on Natura 2000 sites in protecting the existing soft coast environment and providing a dedicated trail network for sustainable recreational use of Natura 2000 sites.	
	C. Objective to maintain existing trails and and establish further looped recreational trails (1)-(3). Refer to objectives map.	Potential negative and positive impact on Natura 2000 sites. Initiatives which increase human use and access to the coastal zone have the potential to give rise to impacts on habitats and cause disturbance to birds and other species generally. At present there is erosion of the dune systems at Strandhill from recreational use. The proposed recreational trail network will add further to existing recreational pressure on protected habitats and species. Obj 44.2 A (Coastal Management Plan) and Obj 44.7 C (Development of a Trail Network) will have positive impacts on Natura 2000 sites in protecting the existing soft coast	

		environment and providing a dedicated trail network for sustainable recreational use of Natura 2000 sites.	
44.8 Business and enterprise	A. Objective to support the continued operation of Sligo Airport.	No impacts identified.	n/a
	B i-ii. Objective relating to the protection of existing flight paths.	No impacts identified.	n/a
44.9 Buffer zone	A. Objective to encourage landowners to manage land sustainably in buffer area which will remain principally in low-intensity agricultural use.	Potential negative impact on Natura 2000 sites.	
	B. Objective to require all new and replacement agricultural structures to be designed sensitively.	Potential negative and positive impact on Natura 2000 sites. Future agricultural development adjacent to Natura 2000 sites should be undertaken in consultation with NPWS, DAHG and should be subject to appropriate assessment at project level. Appropriate siting and design of structures will have positive impact on Natura 2000 sites.	Cummeen Strand/Drumcliff Bay cSAC Ballysadare Bay cSAC Cummeen Strand SPA Ballysadare Bay SPA
44.10 Wastewater treatment	A. Upgrade of waste water treatment plant (WWTP) to cater for c. 3000 (Population Equivalent).	Potential positive impact on Natura 2000 sites. The Strandhill WWTP is located on undesignated lands within the Cumeen Strand/Drumcliff Bay cSAC. The existing plant has a design PE (population equivalent) of 1,500 and is operating at capacity. The existing treatment process comprises primary treatment (screening) and secondary treatment (activated sludge, oxidisation ditch and final settlement). At present waste water and surface water are	Cummeen Strand/Drumcliff Bay cSAC Cummeen Strand SPA Ballysadare Bay SPA

		combined in the drainage network and coupled with limited capacity this has led to the WWTP not operating optimally on occasions. Strandhill WWTP is included in the Water Services Investment Programme 2010-2013. Significant work has taken place to improve the efficiency of the plant pending the proposed upgrade. An application for a wastewater discharge license is currently being considered by the EPA. Deterioration of water quality could affect habitats (mudflats) upon which species for which the adjoining SPAs are designated are dependent. However, increasing nutrient inputs may also have beneficial impacts by increasing invertebrate availability for birds. Taking this into account and given the distance of the discharge point to the nearest mudflat areas of the SPAs, it is considered that the proposed WWTP upgrade will have a positive impact on winter feeding/roosting sites for birds and water quality generally. The provision of an upgrade for the Strandhill WWTP is currently being planned for delivery. Future WWTP upgrade should be undertaken in consultation with NPWS, DAHG and should be subject to appropriate assessment at project level.	

4.4 Zonings

The Draft Strandhill Mini-Plan, Map 1, provides the proposed Zoning Map for the Plan area. The purpose of zoning is to indicate the land use objectives for all the lands within the Plan area. Zoning aspires to promote the orderly development of the Plan area by eliminating potential conflicts between incompatible land uses, and to establish an efficient basis for investment in public infrastructure and facilities. It should be noted that the portions of Natura 2000 Sites located below the high tide mark are not zoned on the zoning map because these lie outside the remit of the Plan which ends at the high water mark. This includes the majority of the areas of Cummeen Strand SPA and Ballysadare Bay SPA.

4.4.1 Zoning

Most of the zoned land within Natura 2000 Sites and most of the land immediately adjacent to them is zoned as 'Buffer zone'. The County Development Plan 2011-1017 Volume 2 Mini-Plans Chapter 13 Mini Plan General Policies provides the following in respect of buffer zones (S. 13.8) in addition to a detailed Mini Plans Zoning Matrix.

'A. Establish a buffer zone around settlements, between the plan limit and the development limit, with a view to:

- *consolidating and containing settlements within a single development limit;*
- *safeguarding land for the future expansion of settlements and for the provision of infrastructure;*
- *preserving views;*
- *protecting the integrity of archaeological sites and monuments in the area surrounding the village;*
- *protecting and enhancing designated nature conservation sites (pNHAs, SACs, SPAs etc);*
- *excluding from development those lands which are at risk from flooding.*

***B.** Reserve the buffer zone principally for agricultural use.*

***C.** Ensure that the siting and construction of new roads and buildings in the buffer zone minimize their visual and environmental impact.*

***E.** Within the Buffer Zone, proposals for one-off rural housing shall only be accommodated in cases of proven need of immediate family members of locally-resident families who wish to build on their own land and have no suitable option on their holdings outside the buffer zone.*

***F.** In relation to housing, give preference to the sensitive renovation or replacement of existing vacant or derelict structures.'*

Whilst there is potential for some forms of development to result in negative impacts on the conservation objectives of Natura 2000 sites should they be permitted, it is considered that the Council's commitments to Appropriate Assessment that are presented in the Draft Plan, including the amendments proposed in this Report, will be sufficient to prevent inappropriate development from occurring within the boundaries of the Natura 2000 sites.

4.4.2 Other Zonings

Small areas of land immediately adjacent to Natura 2000 site boundaries (and therefore in locations where the risk of indirect impacts on the Sites is relatively high) are zoned in a number of ways. It is considered that the Council's commitments to Appropriate Assessment that are presented in the Draft Plan, including the amendments proposed in this Report, will be sufficient to prevent inappropriate development in these areas.

4.5 Mitigation Measures

This section presents details of proposals for mitigation to the objectives of the Draft Strandhill Mini-Plan (January 2013). This mitigation, in the context of a land use plan such as the Strandhill Mini-Plan should be viewed as mitigation to ensure that the no negative impacts arise on Natura 2000 sites as a result of implementation of the Plan. It is not intended to remove the requirement (under the provisions of the Habitats Directive) for a detailed consideration of specific proposals at the project level; i.e. 'project level' AA.

Objective Emphasising the need for Appropriate Assessment Screening:

The draft Mini-Plan provides for a general commitment for appropriate assessment screening as follows:

Objective 44.1 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).'

Project-Specific and Location-Specific Objectives that Require Caveats:

In undertaking the assessment of likely significant effects of the Mini-Plan objectives on the conservation objectives of Natura 2000 sites within the impact zone there were a number of cases where the plan objectives have the potential for negative impact on Natura 2000 sites. In most cases these objectives are specific to either a particular project or a particular location and it is considered very likely that some level of conflict will arise between the objective and the need to protect the Natura 2000 sites. Accordingly in these specific cases it is considered appropriate that caveats should be amended to those objectives to ensure no negative impacts on Natura 2000 sites arise from the implementation of the Mini-Plan.

The following amendments to objectives are therefore recommended.

Section 44.1 Landscape, natural heritage, open space

Obj. G *'Provide for a number of incidental public open spaces, notably:*

i. the Sligo entrance to the village, between the new and old R292, where a floral or shrub display might be developed, possibly in conjunction with a piece of public art (location marked OS1 on Objectives Map);

ii. a strip of land to the east of the Airport Road, which would lend itself to a tree and shrub belt for amenity and shelter purposes (location marked OS2 on Objectives Map).'

iii. *Require any development on the site of Seaview House on Upper Buenos Ayres Drive to retain and landscape a substantial element of open space at the eastern end of the existing garden (location marked OS3 on Objectives Map).*

Should be amended to:

'Provide for a number of incidental public open spaces whilst ensuring the protection of designated sites through screening for Appropriate Assessment, notably:

i. *the Sligo entrance to the village, between the new and old R292, where a floral or shrub display might be developed, possibly in conjunction with a piece of public art (location marked OS1 on Objectives Map);*

ii. *a strip of land to the east of the Airport Road, which would lend itself to a tree and shrub belt for amenity and shelter purposes (location marked OS2 on Objectives Map).'*

iii. *Require any development on the site of Seaview House on Upper Buenos Ayres Drive to retain and landscape a substantial element of open space at the eastern end of the existing garden (location marked OS3 on Objectives Map).*

Section 44.2 Coastal Protection

Obj. A *'Prepare an integrated coastal management plan for Strandhill in consultation with relevant agencies and interested parties. This plan should address, inter alia, the existing and potential recreational uses of the area.'*

Should be amended to:

'Prepare an integrated coastal management plan for Strandhill in consultation with relevant agencies and interested parties. This plan should address, inter alia, the existing and potential recreational uses of the area. The coastal management plan will ensure the protection of Natura 2000 sites through the Appropriate Assessment process.'

Obj. D 'Maintain and review dune management, to include, where necessary, appropriate fencing, boardwalks and public information boards.'

Should be amended to:

'Maintain and review dune management, to include, where necessary, appropriate fencing, boardwalks and public information boards while taking full account of the need to protect the natural and cultural heritage of the coast and the need to avoid significant adverse impacts on Natura 2000 Sites and on species protected by law.'

Section 44.4 Mixed Use Zones

Obj. D. 'Encourage the redevelopment of the Promenade 'Corner' on the sea front (MIX 1, Objectives Map) currently comprising shops, dwellings and a public open space, subject to any necessary coastal protection measures.'

Should be amended to:

'Encourage the redevelopment of the Promenade 'Corner' on the sea front (MIX 1, Objectives Map) currently comprising shops, dwellings and a public open space, subject to any necessary coastal protection measures whilst ensuring the protection of designated sites through screening for Appropriate Assessment at project level.'

Section 44.5 Transport, circulation and parking

Obj. A. *'Reserve land for a New Airport Road linking the R292 to the existing Airport Road (R277).'*

Should be amended to:

'Reserve land for a New Airport Road linking the R292 to the existing Airport Road (R277) whilst ensuring the protection of designated sites through screening for Appropriate Assessment at project level.'

Obj. C *' Extend the Promenade in a northerly direction and link up with the existing Airport Road as indicated on the Objectives Map, to include for the upgrading of the existing lane from the caravan park to the Airport Road. All necessary coastal protection measures should be incorporated into such a project. This extension should be developed in a similar fashion to the existing Promenade whilst also preserving as much as possible of the seafront area as a public amenity.'*

Should be amended to:

' Extend the Promenade in a northerly direction and link up with the existing Airport Road as indicated on the Objectives Map, to include for the upgrading of the existing lane from the caravan park to the Airport Road whilst taking full account of the need to protect the natural and cultural heritage of the coast and the need to avoid significant adverse impacts on Natura 2000 Sites and on species protected by law. All necessary coastal protection measures should be incorporated into such a project. This extension should be developed in a similar fashion to the existing Promenade whilst also preserving as much as possible of the seafront area as a public amenity.'

Section 44.6 Community Facilities

Obj. B *'Require any development proposed on the greenfield site CF1 (refer to the Objectives Map) to provide a range of facilities such as a citizens' advice point, social services, tourist information, skate park and indoor sports. A youth centre and childcare facilities may be provided within the same building or in a separate structure.'*

Should be amended to:

'Require any development proposed on the greenfield site CF1 (refer to the Objectives Map) to ensure the protection of designated sites through screening for Appropriate Assessment at project level. Any proposed development shall provide a range of facilities such as a citizens' advice point, social services, tourist information, skate park and indoor sports. A youth centre and childcare facilities may be provided within the same building or in a separate structure.'

Section 44.7 Tourism Development

Obj. A. *'Promote the development of tourism related-infrastructure and facilities within the village in order to increase visitor numbers and to create more local employment.'*

Should be amended to:

'Promote the development of tourism related-infrastructure and facilities within the village in order to increase visitor numbers and to create more local employment, subject to Appropriate Assessment under the Habitats Directive'

Obj. B. *'Provide a public parking and picnic area to the north of the caravan park, in conjunction with the new road (See Section 44.5). This area will be located adjacent to the existing caravan park entrance, from where two-way traffic movements will operate (location marked TRANS 2 on the Objectives Map). In addition, adequate provision will be made for alternative circulation arrangements within the caravan park.'*

Should be amended to:

'Provide a public parking and picnic area to the north of the caravan park, in conjunction with the new road (See Section 44.5), subject to Appropriate Assesment under the Habitats Directive and the implementation of a Coastal Management Plan (Obj. 44.2 A) and a Management Plan for the Council lands at Killaspugbrone (Obj. 44.1 B.). This area will be located adjacent to the existing caravan park entrance, from where two-way traffic movements will operate (location marked TRANS 2 on the Objectives Map). In addition, adequate provision will be made for alternative circulation arrangements within the caravan park.'

Section 44.9 Buffer Zone

Obj. B 'Require all new and replacement agricultural structures to be designed in such manner that they do not interfere with the character of the landscape.'

Should be amended to:

'Require all new and replacement agricultural structures to be designed in such manner that they do not interfere with the character of the landscape, whilst ensuring the protection of designated sites through screening for Appropriate Assessment at project level'.

Section 44.10 Wastewater Treatment

Obj. A. 'Upgrade the wastewater treatment plant at Killaspugbrone to cater for a population equivalent (PE) of circa 3,000.'

Should be amended to:

'Upgrade the wastewater treatment plant at Killaspugbrone to cater for a population equivalent (PE) of circa 3,000, whilst ensuring the protection of designated sites through undertaking Appropriate Assessment at project level.'

5. CONCLUSION

This Natura Impact Report presents the findings of a Stage 2 Appropriate Assessment undertaken on the Draft Strandhill Mini-Plan.

The Appropriate Assessment Screening (Stage 1) identified that there was potential for likely significant effect arising from the adoption and implementation of the draft Mini-Plan. Accordingly, Stage 2 Appropriate Assessment (this Natura Impact Report) was undertaken to identify potential likely significant effects on Natura 2000 sites arising from the implementation of the Draft Mini-Plan.

Where it was identified that some elements of the Draft Mini-Plan had potential to result in adverse effects on the integrity of a Natura 2000 site, mitigation measures in the form of amendments to the Mini-Plan have been proposed in this report. The mitigation measures seek to prevent inappropriate development that could result in significant negative impacts on the conservation objectives of Natura 2000 sites from occurring within the boundaries of the Natura 2000 sites, or adjacent to such sites.

Together with the Council's commitments to the Habitats Directive and Appropriate Assessment that are presented in the Sligo County Development Plan 2011-2017 and this Draft Mini-Plan it is concluded that these measures will be sufficient to ensure that there will be no adverse effect on the integrity of Natura 2000 sites arising from the implementation of the Draft Mini-Plan.

Prepared by

Siobhán Ryan
Heritage Officer
Sligo County Council

6. References

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 B

Natura Impact Report for the Proposed Amendments to the Draft Strandhill Mini-Plan/Variation of Sligo County Development Plan 2011-2017

Prepared by the Heritage Office of Sligo County Council

1 August 2013

Contents

6. **Introduction**
   - 6.1. Background and Legislative Context
   - 6.2. Stages of the Appropriate Assessment
   - 6.3. Terminology

7. **Methodology**
   - 7.1. Approach
   - 7.2. Data Sources
   - 7.3. Consultation

8. **Stage 1 – Screening for Appropriate Assessment**
   - 8.1. Description of the Proposed Amendments to the draft Plan
   - 8.2. Features of the Proposed Amendments that could impact on Natura 2000 Sites
   - 8.3. Brief Description and identification of the Natura 2000 Sites to be screened
   - 8.4. Conservation Objectives
   - 8.5. Documented Threats to the Special Areas of Conservation
   - 8.6. Documented Threats to Special Protection Areas
   - 8.7. Likely Changes to Natura 2000 Sites
   - 8.8. Screening of Proposed Amendments
   - 8.9. Screening Conclusions

9. **Stage 2 – Natura Impact Report**
   - 9.1. Overview
   - 9.2. Likely Significant Effects of the Proposed Amendments on the Conservation Objectives of the Natura 2000 Site
   - 9.3. Consultation with Environmental Authorities
   - 9.4. Conclusion

10. **References**

1. 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, and proposed amendments to these, on certain sites that are designated for the protection of nature (Natura 2000 sites[3]), 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 or its amendments 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 draft Plan, any proposed amendments and the final Plan as adopted.

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 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*

[3] 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.

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 of the proposed amendments to the Draft 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 of the proposed amendments to the Draft Strandhill Mini-Plan 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.

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.

4.2 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 draft Mini-Plan proposed amendments 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 progresses 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 Natura Impact 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 proposed amendments 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 Appropriate Assessment Screening Statement or Natura Impact Report.

3 STAGE 1 – SCREENING FOR APPROPRIATE ASSESSMENT

3.1 Description of the Proposed Amendments to the Draft Strandhill Variation/Mini Plan

The proposed amendments to the Draft Strandhill Variation/Mini Plan are outlined in Tables 4 and 5 of this document.

3.2 Features of the Proposed Amendments that could impact on Natura 2000 Sites

Impacts arising from the implementation of objectives of the draft plan which could 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 proposed amendments were reviewed as part of the screening process. 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).

3.3 Brief Description and Identification of the Natura 2000 sites to be screened

Four Natura 2000 sites were identified during the screening of the Draft Mini-Plan that could potentially be impacted by the draft Plan. These were:

- Ballysadare Bay Special Area of Conservation (Site Code 000622)
- Cummeen Strand/Drumcliff Bay Special Area of Conservation (Site Code 000627)
- Cummeen Strand Special Protection Area (Site Code 004035)
- Ballysadare Bay Special Protection Area (Site Code 004129)

Screening of the proposed amendments also focuses on these sites. Screening is based on a desktop review of information relating to these sites and to the habitats and species that they support. Figures 1 and 2 below provide the locations of the SACs and SPAs immediately adjoining or within the Plan boundary, respectively. These sites along with their qualifying interests are listed in Table 1 (SACs) and Table 2 (SPAs) below.



Fig. 1 **Special Areas of Conservation immediately adjoining or within the Plan boundary.**



Fig.2 **Special Protection Areas immediately adjoining or within the Plan boundary.**

Table 1 List of Natura 2000 sites (Special Areas of Conservation) immediately adjacent to Strandhill

Site Code	Site Name	Qualifying Feature		Documented Potential Threats*
		Annex I Habitat	Annex II Species	
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
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

Note 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 2 List of Natura 2000 sites (Special Protection Areas) immediately adjacent to Strandhill

Site Code	Site Name	Qualifying Feature Annex I Species	Documented Potential Threats*
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
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

3.4 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.'

3.5 Documented Threats to the Special Areas of Conservation

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 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.

3.6 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 2 presents a summary of the generalised threats to the SPAs relevant to the Strandhill Mini-Plan.

3.7 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. **Table 3** below presents a summary of the findings of this exercise. **Tables 4 and 5** below provide the screening matrix for the proposed amendments to the Plan with an Appropriate Assessment Screening Response provided in each case. 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 Potential Impacts of Proposed Amendments on Natura 2000 Sites

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.)
Ballysadare Bay SAC	None	None	None	None	None
Cummeen Strand/Drumcliff Bay SAC	Potential Impacts	Potential Impacts	Potential Impacts	Potential Impacts	Potential Impacts
Cummeen Strand SPA	None	None	None	None	None
Ballysadare Bay SPA	None	None	None	None	None

3.8 Screening of Proposed Amendments

Amendments have been proposed to the text of the Draft Variation/Mini-Plan (narrative and several objectives) and also to the Zoning Map. The proposed amendments to the text of the Mini-Plan are shown in blue type like this for text proposed to be inserted. There is no proposal to delete text. The amendments to the Zoning Map are indicated by a **black outline** and are accompanied by the number of the corresponding amendment.

Table 4 identifies the environmental consequences of the Managers Recommendations to the Draft Variation/Mini-Plan which were put before the Elected Members at a meeting on the 13 May 2013.

Table 5 identifies the environmental consequences of the Elected Members proposed amendments to the Draft Variation/Mini-Plan which was put before the Elected Members at a meeting on the 13 May 2013.

Table 4 **PROPOSED AMENDMENTS - MANAGERS RECOMMENDATIONS – APPROPRIATE ASSESSMENT SCREENING**

Ref.	Proposed Amendments - Managers Recommendations	Potential for impact on Natura 2000 Sites
A-1	Under the heading **Population and housing** (p. 1 of the Draft Mini-Plan), include the following paragraph: *The Core Strategy of the CDP allocated to Strandhill 14.4 ha of greenfield land, which included (in 2012-2013) 4.03 ha of land with existing planning permission for residential development, comprising some 204 potential residential units. This equates to 10.37 ha which have been zoned for residential development in this Mini-Plan. Mixed-use lands are also included in the allocation based on an average of 65% residential development in the mix of uses.*	None
A-2	In **Section 44.1 Landscape, natural heritage, open space,** modify **objective G** as follows: *Provide for a number of incidental public open spaces whilst ensuring the protection of designated sites through screening for Appropriate Assessment, notably: ...*	None
A-3	In **Section 44.2 Coastal protection,** modify **objective A** as follows: *Prepare an integrated coastal management plan for Strandhill in consultation with relevant agencies and interested parties. This plan should address, inter alia, the existing and potential recreational uses of the area. The coastal management plan will ensure the protection of Natura 2000 sites through the Appropriate Assessment process.*	None

Ref.	Proposed Amendments - Managers Recommendations	Potential for impact on Natura 2000 Sites
A-4	In **Section 44.2 Coastal protection,** modify **objective D** as follows: *Maintain and review dune management to include, where necessary, appropriate fencing, boardwalks and public information boards, in consultation with the National Parks and Wildlife Service of the DAHG.*	None
A-5	In **Section 44.4 Mixed-use zones**, modify **objective B** as follows: *Discourage piecemeal, haphazard development and ensure the assembly and consolidated development of lands within the mixed-use zones on the basis of integrated design proposals/masterplans with appropriate pedestrian/cycle/vehicular links. Prospective developers shall have regard to the DECLG's Guidelines for Planning Authorities – Sustainable Development in Urban Areas (Cities, Towns and Villages) and to the DoT/DECLG Design Manual for Urban roads and Streets (2013).*	None
A-6	In **Section 44.4 Mixed-use zones,** modify **objective D** as follows: *Encourage the redevelopment of the Promenade 'Corner' on the sea front (MIX 1, Objectives Map) currently comprising shops, dwellings and a public open space, subject to any necessary coastal protection measures whilst ensuring the protection of designated sites through screening for Appropriate Assessment at project level.*	None

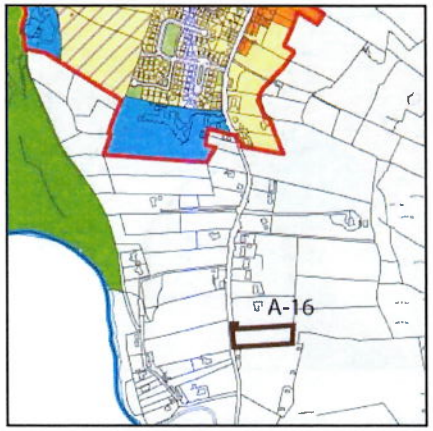
Ref.	Proposed Amendments - Managers Recommendations	Potential for impact on Natura 2000 Sites
A-8	In **Section 44.5 Transport, circulation and parking,** modify **objective A** as follows: *Reserve land for a New Airport Road linking the R292 to the existing Airport Road (R277) whilst ensuring the protection of designated sites through screening for Appropriate Assessment at project level.*	None
A-9	In **Section 44.5 Transport, circulation and parking,** modify **objective C** as follows: *Extend the Promenade in a northerly direction and link up with the existing Airport Road as indicated on the Objectives Map, to include for the upgrading of the existing lane from the caravan park to the Airport Road whilst taking full account of the need to protect the natural and cultural heritage of the coast and the need to avoid significant adverse impacts on Natura 2000 Sites and on species protected by law. All necessary coastal protection measures should be incorporated into such a project. This extension should be developed in a similar fashion to the existing Promenade whilst also preserving as much as possible of the seafront area as a public amenity.*	None
A-10	In **Section 44.6 Community facilities,** modify **objective B** as follows: *Require any development proposed on the greenfield site CF1 (refer to the Objectives Map) to ensure the protection of designated sites through screening for Appropriate Assessment at project level. Any proposed development should provide a range of facilities such as a citizens' advice point, social services, tourist information, skate park and indoor sports. A youth centre and childcare facilities may be provided within the same building or in a separate structure.*	None

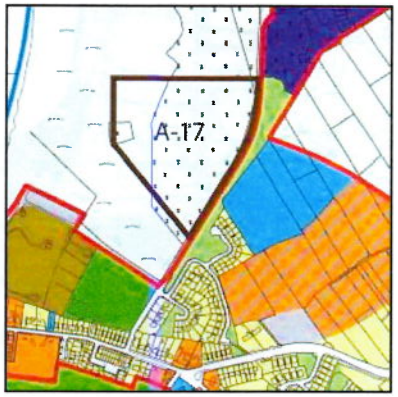
Ref.	Proposed Amendments - Managers Recommendations	Potential for impact on Natura 2000 Sites
A-12	In **Section 44.7 Tourism development,** modify **objective A** as follows: *Promote the development of tourism related-infrastructure and facilities within the village in order to increase visitor numbers and to create more local employment, subject to Appropriate Assessment under the Habitats Directive.*	None
A-13	In **Section 44.7 Tourism development,** modify **objective B** as follows: *Provide a public parking and picnic area to the north of the caravan park, in conjunction with the new road (See Section 44.5), subject to Appropriate Assessment under the Habitats Directive and the implementation of a Coastal Management Plan (Obj. 44.2 A) and a Management Plan for the Council lands at Killaspugbrone (Obj. 44.1 B.). This area will be located adjacent to the existing caravan park entrance, from where two-way traffic movements will operate (location marked TRANS 2 on the Objectives Map). In addition, adequate provision will be made for alternative circulation arrangements within the caravan park.*	None
A-14	In **Section 44.9 Buffer zone,** modify **objective B** as follows: *Require all new and replacement agricultural structures to be designed in such manner that they do not interfere with the character of the landscape, whilst ensuring the protection of designated sites through screening for Appropriate Assessment at project level.*	None

Ref.	Proposed Amendments - Managers Recommendations	Potential for impact on Natura 2000 Sites
A-15	In **Section 44.10 Wastewater treatment,** modify **objective A** as follows: *Upgrade the wastewater treatment plant at Killaspugbrone to cater for a population equivalent (PE) of circa 3,000, whilst ensuring the protection of designated sites through undertaking Appropriate Assessment at project level.'*	None

Table 5 **PROPOSED AMENDMENTS – ELECTED MEMBERS – APPROPRIATE ASSESSMENT SCREENING**

Ref.	Proposed Amendments - Elected Members	Potential for impact on Natura 2000 Sites
A-7	In **Section 44.4 Mixed-use zones**, modify objective G as follows: *Require that any development proposal on village centre site MIX 2 (Council car park) incorporates the following:* *i. a pedestrian civic square, capable of being used for events and local markets;* *ii. pedestrian and possibly vehicular linkages to the Promenade to the west, behind existing development;* *iii. the location of any car parking behind the building line.* *In recognition of the scale, and strategic location of the Council car park, the only mixed use development permitted on this site will be the enhancement of the present car parking facility, a community centre and the provision of other recreational facilities.* *Terraced buildings up to three storeys shall be permitted, subject to appropriate 'feathering', to integrate with adjoining developments, from the council car park to the existing promenade & in the existing promenade area. The community centre courtyard shall be designed to a high standard in a manner capable of enhancing the streetscape and complementing the existing village. However, any developments within the car park itself shall be restricted to two storeys.*	None

Ref.	Proposed 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.*	**Potential Impact – Negative** Significant negative impacts would be expected to result from the proposed amendment arising from direct and indirect impacts on habitats (Annex I) and species (Annex II) listed in the Habitats Directive. Including: • Habitat loss and fragmentation. • Decrease in water quantity/quality, changes in local hydrology. • Increased pollution/erosion. • Disturbance to species or habitats (e.g. increased noise, illumination, human activity). • direct or indirect damage to the populations of species for which the Natura 2000 site is designated.
A-16	Change the zoning of the **site marked A-16** on the Proposed Amendments Map from 'buffer zone' to 'residential uses' and indicate on the Zoning Map that only one house is to be accommodated on the site. 	None

Ref.	Proposed 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] 	**Potential Impact - Negative** Significant negative impacts would be expected to result from the proposed amendment arising from direct and indirect impacts on habitats (Annex I) and species (Annex II) listed in the Habitats Directive. • Habitat loss and fragmentation. • Decrease in water quantity/quality, changes in local hydrology. • Increased pollution/erosion. • Disturbance to species or habitats (e.g. increased noise, illumination, human activity). • Direct or indirect damage to the populations of species for which the Natura 2000 site is designated.
A-18	Change the zoning of the **site marked A-18** on the Proposed Amendments Map from 'buffer zone' to 'residential uses'. 	None

3.9 SCREENING CONCLUSION

The likely impacts that will arise from the proposed amendments to 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, 4** and **5**. 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, one SAC (Cummeen Strand/Drumcliff Bay cSAC) was brought forward for Stage 2 Appropriate Assessment (**Table 6**).

Table 6 Summary of Sites Requiring Stage 2 Appropriate Assessment

Site Name	Site Code	Requirement for Stage 2 Appropriate Assessment
Ballysadare Bay cSAC	000622	Not Required
Cummeen Strand/Drumcliff Bay cSAC	000627	Required
Cummeen Strand SPA	004035	Not Required
Ballysadare Bay SPA	004129	Not Required

4. STAGE 2 –NATURA IMPACT REPORT

4.1 Overview

This section of the Natura Impact Report (NIR) records the Stage 2 Appropriate Assessment carried out on proposed amendments A-11 and A-17 to the Draft Strandhill Mini- Plan, as proposed by the Elected Members at a Council meeting in May 2013 (Table 7). One Natura 2000 site (Cummeen Strand and Drumcliff Bay cSAC) was brought forward for Stage 2 – Appropriate Assessment. Each of the above proposed amendments to the Draft Plan were reviewed with respect to the identified Natura 2000 site and an assessment was made of the effects of the proposed amendments on the integrity of the Natura 2000 site. Table 8 provides details of the Natura 2000 site and its qualifying interests.

Table 7 **Proposed Amendments to the Draft Strandhill Mini-Plan**

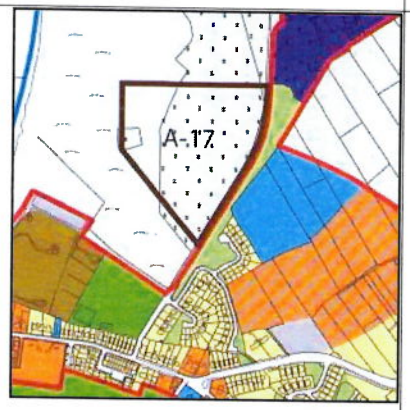
Ref.	Proposed Amendments - Elected Members	Potential for impact on Natura 2000 Sites
A-11	In **Section 44.6 Community facilities**, insert an additional **objective D** as follows: ***D. Land west of Airport Road, including pine plantation*** *Sligo County Council owns most of the land and the pine plantation 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.*	**Potential Impact – Negative** Significant negative impacts would be expected to result from the proposed amendment arising from direct and indirect impacts on habitats (Annex I) and species (Annex II) listed in the Habitats Directive. • Habitat loss and fragmentation. • Decrease in water quantity/quality, changes in local hydrology. • Increased pollution/erosion. • Disturbance to species or habitats (e.g. increased noise, illumination, human activity). • Direct or indirect damage to the populations of species for which the Natura 2000 site is designated.
A-17	Change the zoning of the **site marked YY** on the Proposed Amendments Map from 'buffer zone' to 'community, sports and recreation or caravan park with minimal tree removal"  [Note: the zoning category would be CF-community facilities, as per the Zoning Matrix included in the CDP]	**Potential Impact - Negative** Significant negative impacts would be expected to result from the proposed amendment arising from direct and indirect impacts on habitats (Annex I) and species (Annex II) listed in the Habitats Directive. • Habitat loss and fragmentation. • Decrease in water quantity/quality, changes in local hydrology. • Increased pollution/erosion. • Disturbance to species or habitats (e.g. increased noise, illumination, human activity). • Direct or indirect damage to the populations of species for which the Natura 2000 site is designated.

Table 8 **Natura 2000 Site(s) within Impact Zone and Qualifying Interests**

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

Note 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).

4.2 Likely Significant Effects of the Plan on the Conservation Objectives of the Natura 2000 site

Significant negative impacts would be expected to result from the proposed amendment arising from direct and indirect impacts on habitats (Annex I) and species (Annex II) listed in the Habitats Directive. Such impacts would include the following:

- Habitat loss and fragmentation.
- Decrease in water quantity/quality, changes in local hydrology.
- Increased pollution/erosion.
- Disturbance to species or habitats (e.g. increased noise, illumination, human activity).
- Direct or indirect damage to the populations of species for which the Natura 2000 site is designated.

The Conservation Objectives for the Cummeen Strand/Drumcliff Bay cSAC are as follows:

Objective: To maintain or restore the favourable conservation condition of the Annex I habitat(s) and/or the Annex II species for which the SAC has been selected:

- [1014] *Vertigo angustior*
- [1095] *Petromyzon marinus*
- [1099] *Lampetra fluviatilis*
- [1130] Estuaries
- [1140] Mudflats and sandflats not covered by seawater at low tide
- [1365] *Phoca vitulina*
- [2110] Embryonic shifting dunes
- [2120] Shifting dunes along the shoreline with *Ammophila arenaria* ("white dunes")
- [2130] * Fixed coastal dunes with herbaceous vegetation ("grey dunes")
- [5130] *Juniperus communis* formations on heaths or calcareous grasslands
- [7220] * Petrifying springs with tufa formation (*Cratoneurion*)

The proposed amendments will affect key habitats and species, which are qualifying interests of the Natura 2000 site, in the following way:

Fixed Coastal Dunes **Annex I Priority Habitat**

- Habitat loss and fragmentation.
- Decrease in water quantity/quality, changes in local hydrology.
- Increased pollution/erosion.
- Disturbance to habitats (e.g. increased noise, illumination, human activity).

Narrow-Mouthed Whorl Snail (*Vertigo angustior*) **Annex II Species**

- Habitat loss and fragmentation.
- Decrease in water quantity/quality, changes in local hydrology.
- Increased pollution/erosion.
- Disturbance to species (e.g. increased noise, illumination, human activity).
- Direct or indirect damage to the populations of species for which the Natura 2000 site is designated.

The integrity of the Natura 2000 (determined by structure and function and conservation objectives) is likely to be affected by the proposed amendments through loss of habitat and fragmentation, changes in hydrology, a decrease in water quantity and quality, and increased pollution and disturbance.

The permanent loss of priority Annex I habitat and likely changes to the hydrology of the Natura 2000 site from development arising from the proposed amendments to the Strandhill Mini-Plan are significant effects on the conservation objectives and integrity of the Natura 2000 site. Accordingly, mitigation measures are not considered in this report as no mitigation measures would address the adverse effect of the proposed amendments on the conservation objectives and integrity of the site.

4.3 Consultation with Environmental Authorities

Having regard to the criteria set out in Schedule 2A of the SEA Regulations 2004 and Part XAB of the Planning and Development Act (2010) on 28 May 2013 the Planning Authority determined that both strategic environmental assessment and appropriate assessment are required in respect of the aforementioned proposed amendments of the Draft Variation/Mini-Plan, Pursuant to S. 13(6)(a) of the Planning and Development Act 2000 (as amended).

The proposed amendments were screened for potential environmental effects.

A **Natura Impact Report of the Proposed Amendments to the Draft Plan** was prepared and circulated to the following environmental authorities on 28 June 2013:

- The Environmental Protection Agency (EPA)
- The Department of Communications, Energy and Natural Resources (DCENR)
- The Department of Environment, Community and Local Government (DECLG) and Department of Arts, Heritage and the Gaeltacht (DAHG)
- The Department of Agriculture, Fisheries and Food (DAFF)
- The local authorities adjoining the area under the jurisdiction of Sligo County Council

The **Natura Impact Report** concluded that:

> The proposed interconnected amendments A-11 and A-17 have the potential for significant effects on the integrity of the Cummeen Strand/Drumcliff Bay SAC (site code 000627).
>
> The adoption of the proposed amendments A-11 and A-17 would conflict with the *Habitats Directive Assessment (Appropriate Assessment)* and the related *European and national designated natural heritage sites objectives* included in the same section of the Sligo County Development Plan 2011-2017.

4.3.1 Response of the EPA

The EPA responded on **15 July** with the following specific comments:

A. It is noted that the SEA Screening report identifies that Proposed Amendment A-11 and A-17 in particular, as having have potential for likely significant negative effects to Cummeen Strand/Drumcliffe Bay SAC. **Clarification should be given as to whether an**

option not to proceed with A-11 and A-17 has been considered taking into account the Habitats Directive '*Precautionary Principle*'.

B. In addition, you are referred in *Circular Letter SEA 1/08 & NPWS 1/08*, to the following:

"In any case where, following screening, *it is found that the draft plan or amendment may have an impact on the conservation objectives of a Natura 2000 site or that such an impact cannot be ruled out, adopting a precautionary approach-*

- *an appropriate assessment of the plan must be carried out and*
- *in any case where a strategic environmental assessment (SEA) would not otherwise be required, it must also be carried out"*

C. It should be ensured that consultation is carried out with the NPWS on the scope of the Appropriate Assessment.

D. Clarification should also be given whether *Proposed Amendment A-16* is in keeping with the principles of sustainable development and seeking to avoid/discourage ribbon development. The Plan should seek to ensure that the Core Strategy approach, as advocated by the Regional Planning Guidelines, is incorporated as appropriate.

Planning Authority's comments:

A. It is noted that the decision as to whether to proceed with A-11 and A-17 is a reserved function of the elected members of Sligo County Council. The Executive of the Council can only make a recommendation in this respect. The Natura Impact Report and SEA Screening Report with its present Addendum on the Proposed Amendments have been prepared not only because the legislation so requires, but with the purpose of helping the elected members make an informed decision before adopting the Variation/Mini-Plan with or without amendments.

B. The reference is noted. An appropriate assessment has been carried out and its outcome is presented in the updated Natura Impact Report that accompanies the Proposed Amendments on public display.

A Strategic Environmental Assessment has already been carried out for the County Development Plan. The present Draft Variation, as prepared by the Planning Section of Sligo County Council, was accompanied by a SEA Screening Report, which found that the CDP, as varied, would not have any significant impacts on the environment.

The Proposed Amendments to the Draft Variation have, indeed potential for significant effects on the environment, i.e. on the Cummeen Strand/Drumcliff Bay SAC (site code 000627). The adoption of the proposed amendments A-11 and A-17 would conflict with the **Section 7.1.2 Habitats Directive Assessment (Appropriate Assessment)** and the related **European and national designated natural heritage sites objectives** included in the same section of the Sligo County Development Plan 2011-2017.

However, the potential impact of the "community, sports and recreation" zoning on the site subject to the proposed amendments A-11 and A-17 could, theoretically, be prevented through the rigorous application of relevant County Development Plan provisions contained in **Section 7.1.2 Habitats Directive Assessment (Appropriate Assessment)** (p. 89-90 of the CDP) and the related **European and national designated natural heritage sites objectives** included in the same section.

Therefore, it is considered that the preparation of an Environmental Report in relation to the Proposed Amendments is not warranted at this stage, as the CDP already includes policies designed to prevent such negative impact on the environment.

C. Consultation with the NPWS of the DAHG has taken place.

D. The assessment of A-16 under Section 2.2 of this report indicates the following:

> Strandhill Mini-Plan is designed to implement the CDP's general policies and objectives, including landscape protection objectives and the policy discouraging ribbon development and urban sprawl. For these reasons, the subject site and surrounding area have been designated as buffer zone.
>
> The adoption of the proposed amendment A-16 would conflict with the above-mentioned provisions of the CDP and may result in a negative visual impact on the scenic landscape at the foot of the Knocknarea Mountain. However, the proposed amendment is unlikely to have any significant effects on the environment and, if adopted, would not change the conclusion of the initial SEA Screening.

It is considered that no further clarification is necessary.

4.3.2 Response of Leitrim County Council

Leitrim County Council replied on 16 July as follows:

> This Authority is happy to rely on your offices to ensure that the proposed Variation would, if adopted, comply with the proper planning and sustainable development of the area and in particular with the requirements of the Habitats Directive and Strategic Environmental Requirements.
>
> It is noted by reference to the SEA and Habitat Reports that **certain amendments would, if adopted, give rise to significant environmental impacts and would conflict with the requirements of the Habitats Directive.**
>
> **Were such a conflict remain unresolved, this Authority would have serious reservations about the adoption of any such amendments. As you are aware, any decision to proceed with an amendment that would compromise the integrity of the qualifying interests of a Natura 2000 site would raise serious legal issues and may expose the Council to significant costs.**

Planning Authority's comments:

The response of Leitrim County Council is noted and agreed.

4.3.3 Response of the DCENR

The Geological Survey of Ireland, part of the DCENR, replied on **18 July** with an acknowledgement of the County Council's notification of 28 June. The GSI provided information and links to datasets relating to geological heritage sites. The GSI indicated that any complementary data collected by Sligo County Council regarding karst areas should be forwarded to the Department for inclusion in the national datasets.

The GSI did not make any specific reference to the Proposed Amendments of the Draft CDP Variation/Strandhill Mini-Plan.

Planning Authority's comments:

The response of the DCENR/GSI is noted. No geological field data has been collected as part of the environmental or appropriate assessment of the Draft Variation or its proposed amendments.

4.3.4 Response of the DAHG

The DAHG replied on **23 July** as follows:

A. In relation to the Addendum to the SEA Screening Report, the conclusion states that *'the proposed interconnected amendments A-11 and A-17 have the potential for significant effects on the environment, i.e. on the Cummeen Strand/Drumcliff Bay SAC (site code 000627)'*. In light of this conclusion, proceeding to full SEA for the proposed Amendments may be required. Please consult with the Environmental Protection Agency (EPA) for clarification on this issue.

B. In relation to the Natura Impact Report, the Department notes the Elected Members proposed amendments A-11 and A-17 to the Draft Strandhill Mini-Plan. The Department has had previous discussions regarding the development of a sports community facility within the Special Area of Conservation at this location. Most of the habitat at this location has been modified (conifer plantation) and does not correspond to Annexed habitat (Annex I of the EU Habitats Directive, Council Directive 92/43/EEC on the Conservation of natural habitats and of wild fauna and flora). However, the Department recognises that this area is entirely within the Special Area of Conservation. The present habitat has the potential to be fully restored into dune habitat, i.e. Fixed Dunes with Herbaceous Vegetation (Grey Dunes), which is listed as priority habitat in the EU Habitats Directive. It should also be noted, that the present degraded/modified habitat supports the species Narrow-mouthed Whorl Snail (*Vertigo angustior*), which is a species listed in Annex II of the EU Habitats Directive and is a qualifying feature for the Cummeen Strand/Drumcliff Bay Special Area of Conservation Site No. SAC 000627. This area also supports the protected flora species Round-leaved Wintergreen subsp. *maritima* (*Pyrola rotundifolia maritima*), which is a species listed in the Flora Protection Order, 1999 (SI No. 94 of 1999). **The Department notes the conclusion of the Natura Impact Report, i.e. the proposed amendments may result in adverse impacts on the integrity of the Cummeen Strand/Drumcliff Bay Special Area of Conservation Site No. SAC 000627, a Natura 2000 site. The Department supports the approach of Sligo County Council in relation to this assessment and believes that this conclusion is in line with the conservation objectives of the Cummeen Strand/Drumcliff Bay Special Area of Conservation Site No. SAC 000627.**

Planning Authority's comments:

A. Noted. Consultation with the EPA has taken place.

B. The detailed response and the Department's support of Sligo County Council's approach are noted and agreed.

4.4 Conclusion

This Natura Impact Report presents the findings of a Stage 2 Appropriate Assessment undertaken on the proposed amendments to the Draft Strandhill Mini-Plan.

The Appropriate Assessment Screening (Stage 1) identified that there was potential for likely significant effects arising from the adoption and implementation of the proposed amendments (A-11 and A-17) to the Draft Mini-Plan. Accordingly, Stage 2 Appropriate Assessment (this Natura Impact Report) was undertaken to identify potential likely significant effects on Natura 2000 sites arising from the proposed amendments to the Draft Mini-Plan.

Consultation with the environmental authorities and particularly the Department of Arts, Heritage and the Gaeltacht and the Environmental Protection Agency highlight the potential for adverse impact on the Cummeen Strand/Drumcliff Bay Natura 2000 site arising from proposed amendments A-11 and A-17.

The adoption of the proposed amendments A-11 and A-17 would conflict with Section 7.1.2 *Habitats Directive Assessment (Appropriate Assessment)* and the related *European and National Designated Natural Heritage Sites Objectives* included in the same section of the Sligo County Development Plan 2011-1017.

Furthermore, the adoption of the Draft CDP Variation/Mini-Plan with the amendments A-11 and A-17 would contravene Section 177. V(c) of the Planning and Development Act 2000 (as amended), which specifies that planning authorities shall make a land use plan only after having determined that the said plan would not adversely affect the integrity of a European site.

Accordingly, on the basis of the Precautionary Principle, it can be objectively concluded that adverse impacts of the proposed amendments on the integrity of the Cummeen Strand/Drumcliff Bay Natura 2000 site remain and that the proposed amendments A-11 and A-17 should not be adopted as part of the CDP Variation/Strandhill Mini-Plan.

5. References

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 Data Form and 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.

New MAP

Under FOI AIE

AIER 367

Our Ref: AIER367

Date: 12 March 2026

Áine Nic Amhlaidh
Larass.
Strandhill.
Sligo.

ainenicamhlaidh@gmail.com

Uisce Éireann
Teach Colvill
24-26 Sráid Thalbóid
Baile Átha Cliath 1
D01 NP86
Éire

Uisce Éireann
Colvill House
24-26 Talbot Street
Dublin 1
D01 NP86
Ireland

T: +353 1 89 25000
F: +353 1 89 25001
www.water.ie

Dear Ms. Nic Amhlaidh,

I refer to your request dated 16 February 2026 and received by Uisce Éireann on 16 February 2026 under EU Directive 2003/4/EC (the "Directive") (as transposed by the European Communities (Access to Information on the Environment) Regulations 2007–2018 (the "Regulations") for the following information *relating to Strandhill Wastewater Treatment Plant (upgraded 2021):*

- *As-Built Documentation: The final "as-built" design drawings, site layout, and exact footprint of the completed facility.*
- *Appropriate Assessment (AA): The full Natura Impact Statement (NIS) and AA determination assessing the project's impact on the integrity of the Cummeen Strand/Drumcliff Bay SAC.*
- *Environmental Impact Assessment (EIA): The EIA Screening Report and any subsequent Environmental Impact Assessment Report (EIAR) produced for this build.*
- *Planning Compliance: Records confirming compliance with all environmental conditions attached to the Part 8 planning permission.*
- *Mitigation Measures: Documents detailing the specific mitigation measures implemented during construction to protect the SAC habitats and species.*

Following consideration of the provisions of the AIE Regulations, Uisce Éireann has reached a decision to grant your request on 12 March 2026.

I will address each part of your request below:

- *As-Built Documentation: The final "as-built" design drawings, site layout, and exact footprint of the completed facility.*

I attach the 3 x As-Built drawings from the WwTP Upgrade completed in February 2020. The upgraded works were all completed within the footprint of the original WwTP in accordance with the planning permission.

- *Appropriate Assessment (AA): The full Natura Impact Statement (NIS) and AA determination assessing the project's impact on the integrity of the Cummeen Strand/Drumcliff Bay SAC.*

I attach the AA Screening Report completed on behalf of Sligo County Council in September 2013.

- *Environmental Impact Assessment (EIA): The EIA Screening Report and any subsequent Environmental Impact Assessment Report (EIAR) produced for this build.*

Stiúrthóirí / Directors: Jerry Grant (Cathaoirleach / Chairperson), Niall Gleeson (POF / CEO), Douglas Millican, Michael Nolan, Patricia King, Eileen Maher, Cathy Mannion, Michael Walsh, Rena O'Sullivan and Orlagh Nevin.

Oifig Chláraithe / Registered Office: Teach Colvill, 24-26 Sráid Thalbóid, Baile Átha Cliath 1, D01 NP86 / Colvill House, 24-26 Talbot Street, Dublin, Ireland D01NP86
Is cuideachta ghníomhaíochta ainmnithe atá faoi theorainn scaireanna é Uisce Éireann / Uisce Éireann is a designated activity company, limited by shares.
Cláraithe in Éirinn Uimh.: 530363 / Registered in Ireland No.: 530363.

UE / LH / HO / 0725

Planning permission was granted via Part 8 Planning permission from Sligo County Council Sept 2007. Sligo County Council would have considered EIA requirements as part of the Part 8 planning process. The project did not trigger the requirement for EIAR and therefore proceeded via the Part 8 process. The permitted works were subsequently implemented by UÉ. The Part 8 planning documentation is included in Appendix 1 of the attached document.

- *Planning Compliance: Records confirming compliance with all environmental conditions attached to the Part 8 planning permission.*

The decision-maker has confirmed that the project was completed in accordance with all details included within the Part 8 submission. UÉ does not hold any Planning Compliance records in respect of the above.

- *Mitigation Measures: Documents detailing the specific mitigation measures implemented during construction to protect the SAC habitats and species.*

The decision-maker has advised that the project screened out for AA and an NIS was not required. The project was delivered in accordance with the details included in the Part 8 submission including best practice construction methods.

Review
Under Article 11 of the Regulations, you have a right to seek an internal review of our decision. An internal review must be requested within one month of receipt of our decision. There is no charge for requesting an internal review. If you would like to seek an internal review, you can do so by sending an email to foi@water.ie

Yours sincerely,

Noel Shannon
Freedom of Information Officer

Uisce Éireann

(on behalf of Decision-Maker)

MAP AS BUILT WWTP

AIE

CAUTION: The email originated from outside of your organisation. Do not click links or open attachments unless you recognise the sender and are sure that the content is safe. If you suspect any suspicious activity, please raise an IT Incident ticket to the IT Service Desk.

AIE Request Template

To: FOI Officer, Uisce Éireann (foi@water.ie)
Date: 16-1-26
Subject: Urgent AIE Request: Strandhill WWTP As-Built Records and SAC Environmental Compliance

Dear FOI Officer,

Under the **European Communities (Access to Information on the Environment) Regulations 2007 to 2018**, I am requesting access to the following environmental information regarding the

Strandhill Wastewater Treatment Plant

(upgraded 2021):

1. **As-Built Documentation: The final "as-built" design drawings, site layout, and exact footprint of the completed facility.**
2. **Appropriate Assessment (AA): The full Natura Impact Statement (NIS)and AA determination assessing the project's impact on the integrity of the** Cummeen Strand/Drumcliff Bay SAC**.**
3. **Environmental Impact Assessment (EIA): The EIA Screening Report and any subsequent Environmental Impact Assessment Report (EIAR) produced for this build.**
4. **Planning Compliance: Records confirming compliance with all environmental conditions attached to the Part 8 planning permission.**
5. **Mitigation Measures: Documents detailing the specific mitigation measures implemented during construction to protect the SAC habitats and species.**

Format: Please provide these records in electronic format to this email address.
Urgency: Given the potential for ongoing environmental deterioration within a protected European Site, I request that this be processed as a matter of priority.

Yours faithfully,
Áine Nic Amhlaidh

Larass, Strandhill, Sligo

Tel 087[illegible]32251

MAPS →

Gmail

Ann McKirdy <ainenicamhlaidh@gmail.com>

AIER367 - Response from UÉ

1 message

FOI <FOI@water.ie>
To: Ann McKirdy <ainenicamhlaidh@gmail.com>

Thu, Mar 12, 2026 at 5:40 PM

Hi Aine,

I refer to your email below and attach response letter and records in relation to your AIE request to UÉ (Ref: AIER367).

Regards,

Noel Shannon
AIE Officer

Uisce Éireann
Teach Colvill, 24–26 Sráid Thalbóid, Baile Átha Cliath 1, D01 NP86, Éire
Uisce Éireann
Colvill House, 24–26 Talbot Street, Dublin 1, D01 NP86, Ireland

M +353 87 6244336
noel.shannon@water.ie

www.water.ie

Facebook | Twitter | LinkedIn

From: A McKirdy <ainenicamhlaidh@gmail.com>
Sent: Monday 16 February 2026 05:02
To: FOI <FOI@water.ie>
Subject: AIE REQUEST Urgent AIE Request: Strandhill WWTP As-Built Records and SAC Environmental Compliance

Is don duine amháin nó don eintiteas amháin ainmnithe ar an seoladh an fhaisnéis agus d'fhéadfadh ábhar faoi rún, faoi phribhléid nó ábhar atá íogair ó thaobh na trachtála de a bheith mar chuid den fhaisnéis. Tá toirmeasc ar aon daoine nó aon eititis; nach dóibh siúd an fhaisnéis- aon athbhreithniú a dhéanamh, aon atarchur a dhéanamh nó aon athdháileadh a dhéanamh, nó aon úsáid eile a bhaint as an bhfaisnéis, nó aon ghníomh a bhraithfeadh ar an bhfaisnéis seo a dhéanamh agus d'fhéadfaí an dlí a shárú dá ndéanfaí sin. Séanann Uisce Éireann dliteanas as aon ghníomh agus as aon larmhairt bunaithe ar úsáid neamhúdaraithe na faisnéise seo. Séanann Uisce Éireann dliteanas maidir le seachadadh iomlán agus ceart na faisnéise sa chumarsáid seo agus séanann Uisce Éireann dliteanas maidir le haon mhoill a bhaineann leis an bhfaisnéis a fháil. Má tá an ríomh-phost seo faighte agat trí dhearmad, déan teagmháil leis an seoltóir más é do thoil é agus scrios an t-ábhar ó gach aon ríomhaire. D'fhéadfadh ríomhphost a bheith so-ghabhálach i leith truaillithe, idircheaptha agus i leith leasuithe neamhúdaraithe. Séanann Uisce Éireann aon fhreagracht as athruithe nó as idircheapadh a rinneadh ar an ríomhphost seo nó as aon dochar do chórais na bhfaighteoirí déanta ag an teachtaireacht seo nó ag a ceangaltáin tar éis a sheolta. Tabhair faoi deara go bhféadfadh monatóireacht a bheith á dhéanamh ar theachtaireachtaí chuig Uisce Éireann agus ó Uisce Éireann d'fhonn ár ngnó a chosaint agus chun a chinntiú go bhfuiltear ag teacht le beartais agus le caighdeáin Uisce Éireann. Is cuideachta gníomhaíochta ainmnithe é Uisce Éireann atá faoi theorainn scaireanna, a bunaíodh de bhun fhorálacha na n-Achtanna um Sheirbhísí Uisce 2007-2022, a bhfuil a bpríomh-ionad gnó ag Teach Colvill, 24-26 Sráid na Talbóide, BÁC 1.

Go raibh maith agat as d'aird a thabhairt.

The information transmitted is intended only for the person or entity to which it is addressed and may contain confidential, commercially sensitive and/or privileged material. Any review, retransmission, dissemination or other use of, or taking of any action in reliance upon, this information by persons or entities other than the intended recipient is prohibited and may be unlawful. Uisce Éireann accepts no liability for actions or effects based on the prohibited usage of this information. Uisce Éireann is neither liable for the proper and complete transmission of the information contained in this communication nor for any delay in its receipt. If you received this in error, please contact the sender and delete the material from any computer. E-Mail may be susceptible to data corruption, interception and unauthorised amendment. Uisce Éireann accepts no responsibility for changes to or interception of this e-mail after it was sent or for any damage to the recipients systems or data caused by this message or its attachments. Please also note that messages to or from Uisce Éireann may be monitored to ensure compliance with Uisce Eireann's policies and standards and to protect our business. Uisce Éireann is a designated activity company limited by shares, established pursuant to the Water Services Acts 2007-2022, having its principal place of business at Colvill House, 24-26 Talbot Street, Dublin 1.

Thank you for your attention.

5 attachments

AIER367_Response letter.pdf
245K

J767-CNL-03-XX-DR-M-4001.pdf
925K

J767-CNL-03-XX-DR-M-2001.pdf
490K

J767-CNL-03-XX-DR-M-2002.pdf
497K

Strandhill WWTP & Caravan Park PS AA Screening.pdf
16[illegible]K

Our Ref: AIER367

Date: 12 March 2026

Uisce Éireann
Teach Colvill
24-26 Sráid Thalbóid
Baile Átha Cliath 1
D01 NP86
Éire

Uisce Éireann
Colvill House
24-26 Talbot Street
Dublin 1
D01 NP86
Ireland

T: +353 1 89 25000
F: +353 1 89 25001
www.water.ie

Áine Nic Amhlaidh
Larass.
Strandhill.
Sligo.

ainenicamhlaidh@gmail.com

Dear Ms. Nic Amhlaidh,

I refer to your request dated 16 February 2026 and received by Uisce Éireann on 16 February 2026 under EU Directive 2003/4/EC (the "Directive") (as transposed by the European Communities (Access to Information on the Environment) Regulations 2007–2018 (the "Regulations") for the following information *relating to Strandhill Wastewater Treatment Plant (upgraded 2021):*

- *As-Built Documentation: The final "as-built" design drawings, site layout, and exact footprint of the completed facility.*
- *Appropriate Assessment (AA): The full Natura Impact Statement (NIS) and AA determination assessing the project's impact on the integrity of the Cummeen Strand/Drumcliff Bay SAC.*
- *Environmental Impact Assessment (EIA): The EIA Screening Report and any subsequent Environmental Impact Assessment Report (EIAR) produced for this build.*
- *Planning Compliance: Records confirming compliance with all environmental conditions attached to the Part 8 planning permission.*
- *Mitigation Measures: Documents detailing the specific mitigation measures implemented during construction to protect the SAC habitats and species.*

Following consideration of the provisions of the AIE Regulations, Uisce Éireann has reached a decision to grant your request on 12 March 2026.

I will address each part of your request below:

- *As-Built Documentation: The final "as-built" design drawings, site layout, and exact footprint of the completed facility.*

I attach the 3 x As-Built drawings from the WwTP Upgrade completed in February 2020. The upgraded works were all completed within the footprint of the original WwTP in accordance with the planning permission.

- *Appropriate Assessment (AA): The full Natura Impact Statement (NIS) and AA determination assessing the project's impact on the integrity of the Cummeen Strand/Drumcliff Bay SAC.*

I attach the AA Screening Report completed on behalf of Sligo County Council in September 2013.

- *Environmental Impact Assessment (EIA): The EIA Screening Report and any subsequent Environmental Impact Assessment Report (EIAR) produced for this build.*

Stiúrthóiri / Directors: Jerry Grant (Cathaoirleach / Chairperson), Niall Gleeson (POF / CEO), Douglas Millican, Michael Nolan, Patricia King, Eileen Maher, Cathy Mannion, Michael Walsh, Rena O'Sullivan and Orlagh Nevin.

Oifig Chláraithe / Registered Office: Teach Colvill, 24-26 Sráid Thalbóid, Baile Átha Cliath 1, D01 NP86 / Colvill House, 24-26 Talbot Street, Dublin, Ireland D01NP86
Is cuideachta ghníomhaíochta ainmnithe atá faoi theorainn scaireanna é Uisce Éireann / Uisce Éireann is a designated activity company, limited by shares.
Cláraithe in Éirinn Uimh.: 530363 / Registered in Ireland No.: 530363.

UE / LH / HO / 0725

.anning permission was granted via Part 8 Planning permission from Sligo County Council in Sept 2007. Sligo County Council would have considered EIA requirements as part of the Part 8 planning process. The project did not trigger the requirement for EIAR and therefore proceeded via the Part 8 process. The permitted works were subsequently implemented by UÉ. The Part 8 planning documentation is included in Appendix 1 of the attached document.

- *Planning Compliance: Records confirming compliance with all environmental conditions attached to the Part 8 planning permission.*

The decision-maker has confirmed that the project was completed in accordance with all details included within the Part 8 submission. UÉ does not hold any Planning Compliance records in respect of the above.

- *Mitigation Measures: Documents detailing the specific mitigation measures implemented during construction to protect the SAC habitats and species.*

The decision-maker has advised that the project screened out for AA and an NIS was not required. The project was delivered in accordance with the details included in the Part 8 submission including best practice construction methods.

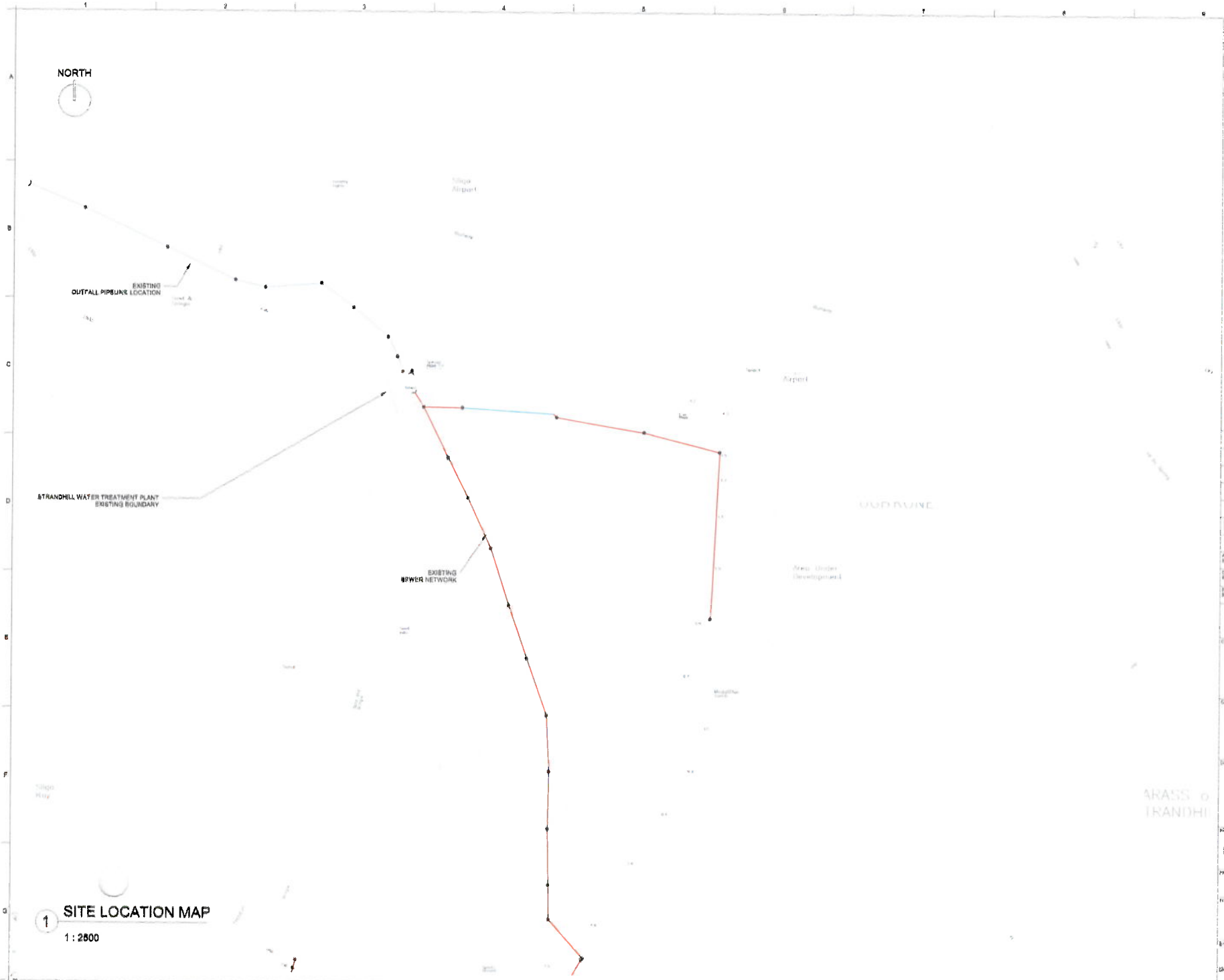
Review
Under Article 11 of the Regulations, you have a right to seek an internal review of our decision. An internal review must be requested within one month of receipt of our decision. There is no charge for requesting an internal review. If you would like to seek an internal review, you can do so by sending an email to foi@water.ie

Yours sincerely,

Noel Shannon
Freedom of Information Officer

Uisce Éireann

(on behalf of Decision-Maker)



1 SITE LOCATION MAP

1 : 2500

NOTES:
1. ALL DIMENSIONS ARE IN MILLIMETRES (mm) UNLESS NOTED OTHERWISE
2. ALL LEVELS ARE IN METRES AND RELATE TO THE ORDNANCE SURVEY DATUM MALIN HEAD (OD) UNLESS NOTED OTHERWISE.
3. ENSURE THIS DRAWING IS THE RELEVANT REVISION AND READ IN CONJUNCTION WITH ALL RELEVANT DOCUMENTS.
4. TO BE VIEWED ON A1 PAPER SIZE

REV	DESCRIPTION	DATE	BY	CHKD
C01	AS CONSTRUCTED	17/06/20	DC	BM

APPROVED BY	Darragh Hobbs Process & MEICA Lead	SIGNED	DATE 17/06/20
CHECKED BY	Barry Mugan Project Engineer	SIGNED	DATE 17/06/20
DRAWN BY	Declan Corcoran CAD Technician	SIGNED	DATE 17/06/20

CONFIDENTIALITY NOTE

CLIENT
Irish Water,
Colvill House,
24-26 Talbot Street,
Dublin 1.

CLIENT'S REPRESENTATIVE
Nicholas O'Dwyer,
Unit 46 Nutgrove Office Park,
Nutgrove Avenue,
Dublin

CONSTRUCTOR
Athenry,
Co. Galway

PROJECT
TUBBERCURRY, GRANGE, STRANDHILL AND BALLINAFAD WWTP BUNDLE DBO CONTRACT

PROJECT NO.
J767

TITLE
STRANDHILL SITE LOCATION MAP

STATUS
CR - AS CONSTRUCTED

DRAWING NO.	REVISION
J767-CNL-03-XX-DR-M-2001	C01



2 DUCTING LAYOUT

1 : 150

NOTES:
1. ALL DIMENSIONS ARE IN MILLIMETRES (mm) UNLESS NOTED OTHERWISE.
2. ALL LEVELS ARE IN METRES AND RELATE TO THE ORDNANCE SURVEY DATUM MALIN HEAD (OD) UNLESS NOTED OTHERWISE.
3. ENSURE THIS DRAWING IS THE RELEVANT REVISION AND READ IN CONJUNCTION WITH ALL RELEVANT DOCUMENTS.
4. TO BE VIEWED ON A1 PAPER SIZE.

NEW 160mm PVC ELECTRICAL — P

NEW 160mm PVC SIGNAL DUCTING — S

DUCTING CHAMBERS

REV.	DESCRIPTION	DATE	BY	CHECK
C01	AS CONSTRUCTED	17/09/20	DC	SM

APPROVED BY:	Darragh Hosie, Process & MEICA Lead	Signature	DATE: 17/09/20
CHECKED BY:	Barry Magan, Project Engineer	Signature	DATE: 17/09/20
DRAWN BY:	Declan Condon, CAD Technician	Signature	DATE: 17/09/20

CONFIDENTIALITY NOTE

DESIGNS, PROCESSES, PROCEDURES AND ASSOCIATED INFORMATION SET OUT HEREIN AND CONTAINED IN ANY SUBSEQUENT REVISIONS, AMENDMENTS, DRAWINGS AND SCHEDULES IS STRICTLY CONFIDENTIAL AND THE PROPERTY OF COFFEY GROUP. WRITTEN CONSENT MUST BE GRANTED BY COFFEY GROUP PRIOR TO DISTRIBUTION TO PARTIES OTHER THAN THE ADDRESSEE.

CLIENT: Irish Water, Colvill House, 24-26 Talbot Street, Dublin 1.

CLIENT'S REPRESENTATIVE: Nicholas O'Dwyer, Unit 48 Ridgeview Office Park, Ridgeview Avenue, Dublin

CONTRACTOR: Coffey Northumbrian Limited, Living water, Athenry, Co. Galway

PROJECT: TUBBERCURRY, GRANGE, STRANDHILL AND BALLINAFAD WWTP BUNDLE DBO CONTRACT

PROJECT NO: J767

TITLE: STRANDHILL DUCTING SITE LAYOUT

STATUS: CR - AS CONSTRUCTED

DRAWING NO: J767-CNL-03-XX-DR-M-4001

REVISION: C01



1 SITE LAYOUT

1 : 200

NOTES:
1. ALL DIMENSIONS ARE IN MILLIMETRES (mm) UNLESS NOTED OTHERWISE.
2. ALL LEVELS ARE IN METRES AND RELATE TO THE ORDNANCE SURVEY DATUM MALIN HEAD (m) UNLESS NOTED OTHERWISE.
3. ENSURE THIS DRAWING IS THE RELEVANT REVISION AND READ IN CONJUNCTION WITH ALL RELEVANT DOCUMENTS.
4. TO BE VIEWED ON A1 PAPER SIZE.

REV	DESCRIPTION	DATE	BY	CHECK
C01	AS CONSTRUCTED	17/06/20	DC	BM

APPROVED BY	Darragh Hobbs Process & MEICA Lead	SIGNED	DATE 17/06/20
CHECKED BY	Barry Mugan Project Engineer	SIGNED	DATE 17/06/20
DRAWN BY	Declan Conlon CAD Technician	SIGNED	DATE 17/06/20

CONFIDENTIALITY NOTE

DESIGN, PROCESSES, PROCEDURES AND ASSOCIATED INFORMATION SET OUT HEREIN AND CONTAINED IN ANY SUBSEQUENT REVISIONS, AMENDMENTS, DRAWINGS AND SCHEDULES IS STRICTLY CONFIDENTIAL AND THE PROPERTY OF COFFEY GROUP. WRITTEN PERMISSION MUST BE GRANTED BY COFFEY GROUP PRIOR TO DISTRIBUTION TO PARTIES OTHER THAN THE ADDRESSEE.

CLIENT
Irish Water,
Colvill House,
24-26 Talbot Street,
Dublin 1.

CLIENT'S REPRESENTATIVE
Nicholas O'Dwyer,
Unit 4B Nutgrove Office Park,
Nutgrove Avenue,
Dublin.

CONTRACTOR
Coffey Northumbrian Limited
Athenry
Co. Galway

PROJECT
TUBBERCURRY, GRANGE, STRANDHILL AND BALLINAFAD WWTP BUNDLE DBO CONTRACT

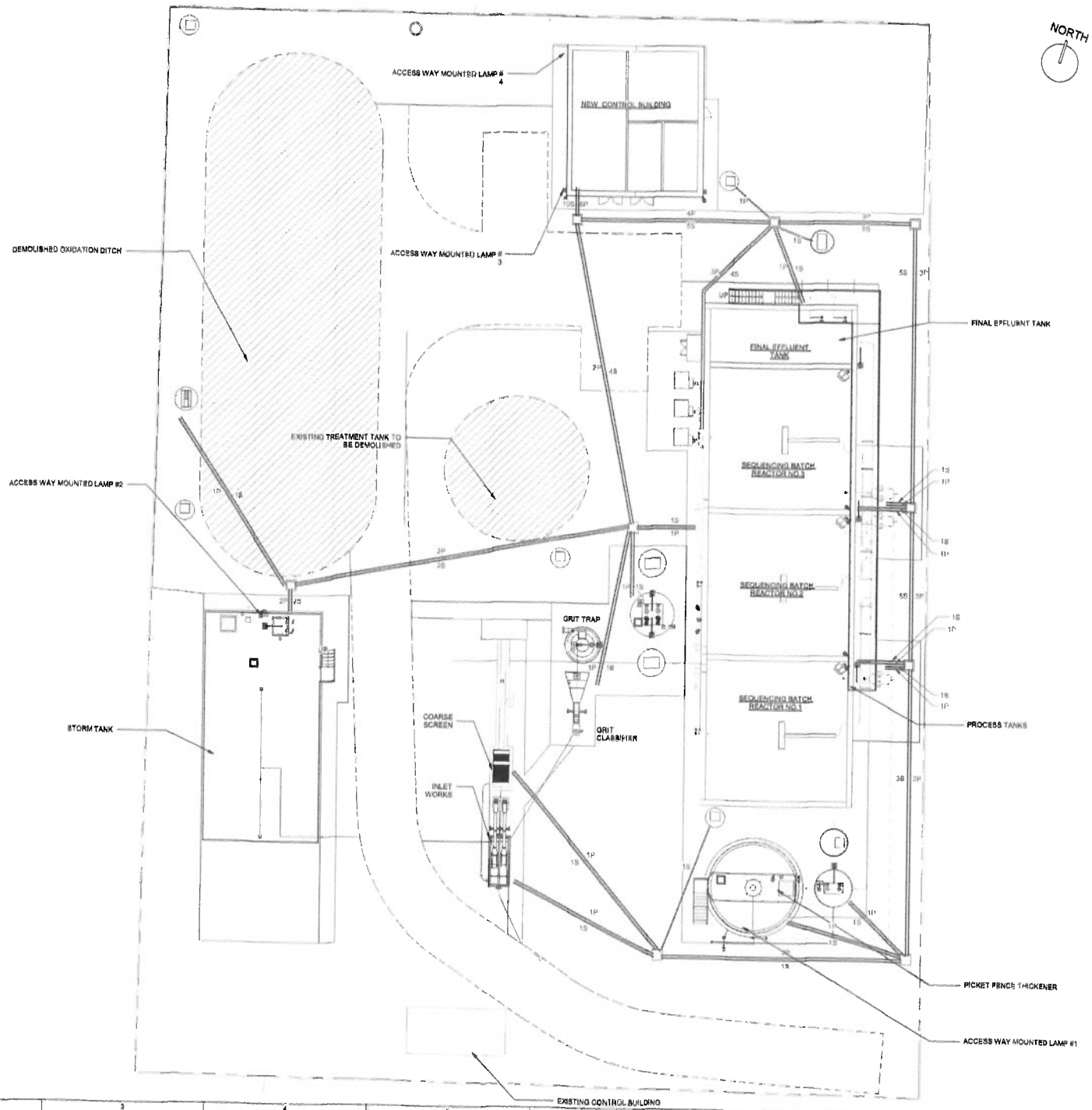
PROJECT NO.
J787

TITLE
STRANDHILL SITE LAYOUT PLAN OLD WORKS

STATUS
CR - AS CONSTRUCTED

DRAWING NO.
J787-CNL-03-XX-DR-M-2002

REVISION
C01



2 DUCTING LAYOUT

1 : 150

NOTES
1. ALL DIMENSIONS ARE IN MILLIMETRES (mm) UNLESS NOTED OTHERWISE.
2. ALL LEVELS ARE IN METRES AND RELATE TO THE ORDNANCE SURVEY DATUM MALIN HEAD (m) UNLESS NOTED OTHERWISE.
3. ENSURE THIS DRAWING IS THE RELEVANT REVISION AND READ IN CONJUNCTION WITH ALL RELEVANT DOCUMENTS.
4. TO BE VIEWED ON A1 PAPER SIZE.

NEW 150mm PVC ELECTRICAL — P

NEW 150mm PVC SIGNAL DUCTING — S

DUCTING CHAMBERS

REV	DESCRIPTION	DATE	BY	CHECK
C01	AS CONSTRUCTED	17/09/20	DC	RM

APPROVED BY	Darragh Hobbs, Process & MEICA Lead	BOARD	DATE 17/09/20
CHECKED BY	Barry Mugan, Project Engineer	BOARD	DATE 17/09/20
DRAWN BY	Declan Corden, CAD Technician	BOARD	DATE 17/09/20

CONFIDENTIALITY NOTE

DESIGNS, PROCESSES, PROCEDURES AND ASSOCIATED INFORMATION SET OUT HEREIN AND CONTAINED IN ANY SUBSEQUENT REVISIONS, APPENDICES, DRAWINGS AND SCHEDULES IS STRICTLY CONFIDENTIAL AND THE PROPERTY OF COFFEY GROUP WHETHER REGISTERED OR COMMONLY COFFEY GROUP. PRIOR TO DISTRIBUTION TO PARTIES OTHER THAN THE ADDRESSEE.

CLIENT
Irish Water,
Colvill House,
24-26 Talbot Street,
Dublin 1.

CLIENT'S REPRESENTATIVE
Nicholas O'Dwyer,
Unit 4B Nutgrove Office Park,
Nutgrove Avenue,
Dublin.

CONTRACTOR
Coffey Northumbrian Limited
Albany,
Co. Galway

PROJECT
TUBBERCURRY, GRANGE, STRANDHILL AND BALLINAFAD WWTP BUNDLE DBO CONTRACT

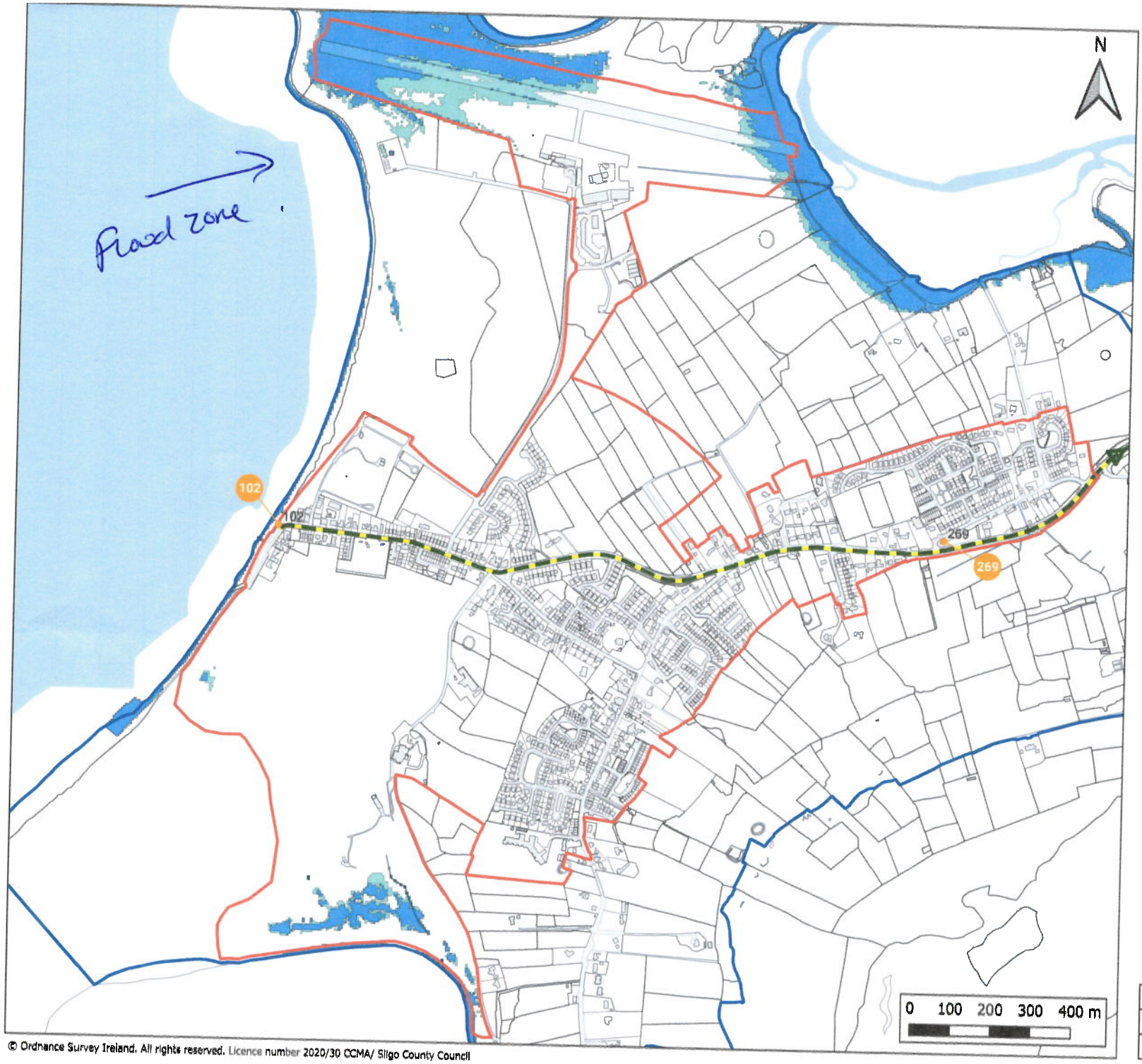
PROJECT NO.
J767

TITLE
STRANDHILL DUCTING SITE LAYOUT

STATUS
CR - AS CONSTRUCTED

DRAWING NO.
J767-CNL-03-XX-DR-M-4001

REVISION
C01



Strandhill
Objectives Map

Flood zone

- Plan Limit
- Development Limit
- protected structures
- LTP cycle route
- Flood Zone A
- Flood Zone B

2024 - 2030

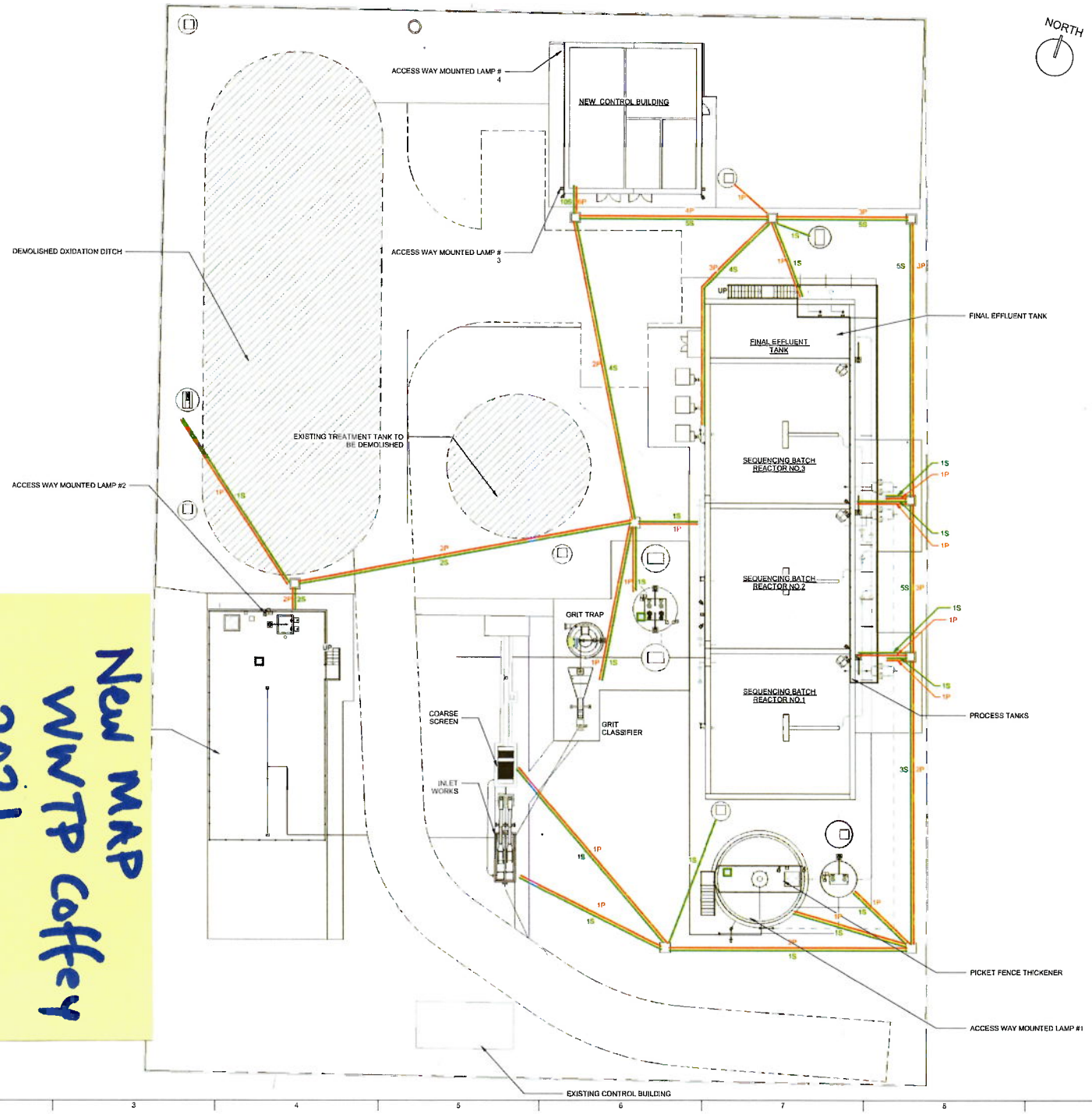
The WWTP is in a flood zone

RPS No.	Structure Name
102	Cannon
269	House (Dolly's Cottage)

11 November 2024

© Ordnance Survey Ireland. All rights reserved. Licence number 2020/30 CCMA/ Sligo County Council

AIE NEW



New MAP WWTP Coffey 2021

2 DUCTING LAYOUT

1 : 150

NOTES
1. ALL DIMENSIONS ARE IN MILLIMETRES (mm) UNLESS NOTED OTHERWISE.
2. ALL LEVELS ARE IN METRES AND RELATE TO THE ORDNANCE SURVEY DATUM MALIN HEAD (mj) UNLESS NOTED OTHERWISE
3. ENSURE THIS DRAWING IS THE RELEVANT REVISION AND READ IN CONJUNCTION WITH ALL RELEVANT DOCUMENTS.
4. TO BE VIEWED ON A1 PAPER SI[illegible]

NEW 150mm PVC ELECTRICAL — P
NEW 150mm PVC SIGNAL DUCTING — S
DUCTING CHAMBERS

REV.	DESCRIPTION	DATE	BY	CHECK
C01	AS CONSTRUCTED	17/06/20	DC	BM

APPROVED BY:	Darragh Hobbs, Process & MEICA Lead	SIGNED:	DATE: 17/06/20
CHECKED BY:	Barry Mugan, Project Engineer	SIGNED:	DATE: 17/06/20
DRAWN BY:	Declan Condon, CAD Technician	SIGNED:	DATE: 17/06/20

CONFIDENTIALITY NOTE
DESIGNS, PROCESSES, PROCEDURES AND ASSOCIATED INFORMATION SET OUT HEREIN AND CONTAINED IN ANY SUBSEQUENT REVISIONS, APPENDICES DRAWINGS AND SCHEDULES IS STRICTLY CONFIDENTIAL AND THE PROPERTY OF COFFEY GROUP. NO REPRODUCTION MUST BE GRANTED BY COFFEY GROUP PRIOR TO DISTRIBUTION TO PARTIES OTHER THAN THE ADDRESSEE

CLIENT
Irish Water,
Colvill House,
24-26 Talbot Street,
Dublin 1.

CLIENT'S REPRESENTATIVE
Nicholas O'Dwyer,
Unit 4E Nutgrove Office Park,
Nutgrove Avenue,
Dublin.

CONTRACTOR
Coffey Northumbrian Limited
Athenry,
Co. Galway

PROJECT
TUBBERCURRY, GRANGE, STRANDHILL AND BALLINAFAD WWTP BUNDLE DBO CONTRACT

PROJECT NO.
J767

TITLE
STRANDHILL DUCTING SITE LAYOUT

STATUS
CR - AS CONSTRUCTED

DRAWING NO.
J767-CNL-03-XX-DR-M-4001

REVISION
C01

2007
WWTP
Licence
&
Part 8
Application

2007

WWTP Strandhill 1/4

Licence

Incl. MAPS

- June 2003 - Licence

ATTACHMENT No: B. 9
POPULATION EQUIVALENT OF AGGLOMERATION

Strandhill Population Projections

The current and future population equivalents for the town have been estimated.

PROJECTED POPULATION FOR STRANDHILL

Population Equivalent	2006	2026
Domestic	1,736	2,630
Commercial	151	229
Total	1,887	2,859

B.9 (ii) Pending Development

An examination of planning permissions has indicated a potential PE of 544 as indicated overleaf.

For inspection purposes only.
Consent of copyright owner required for any other use.

Pg 13/61

Discharge Point

exact location

reported on numerous occasions as

smelling noxiously untreated/raw of sewage

Condition 6

- See Condition 6 molluscan product

Cond 7.

- Comply with Heritage

Cond 13.

- Breach revokation

Planning Reference	Permission Type	Date Search	Number of Dwellings	Commerical Floor Area	Town	Decision Date		Domestic	Commercial	Total
2004										
04/31	2 Houses		Demolish existing house and replace		Strandhill	grant				
04/53	retention				Strandhill	grant		6		6
04/70	Retention				Strandhill	grant				0
04/167	Residental		6 apartments	y	Strandhill	grant		18		18
04/333					Strandhill	grant				0
04/341				y	Strandhill	grant				0
04/422				y	Strandhill	grant				0
04/485				y	Strandhill	grant				0
04/714	Pharmacy & apartment		Demolition of existing D/H & outhouses	y	Strandhill	grant				0
04/755	Retention		Extension to Public house		Strandhill	grant				0
04/1060	retention		House		Strandhill	grant				0
04/1119	Residental		7 Houses		Strandhill	grant		21		21
04/1466	Commercial/Residential	28 apts, 4 retail	Demolt amuse arcade, New 4 retail units, 2 restura		Strandhill	grant		84	???	84
2006										
06/166	Revise elevs to unit				Strandhill	Grant				0
06/252	Demolition of ex D/H		New Apartments		Strandhill	grant		18		18

Map Page 44

Pg 59 - 4500pe advanced stage procurement

Page 1-61 - Sligo Road Pumping Station
West End Pumping Station
upgrade

EPA Export 26-07-2013:01:52:04

05/317	ext to d/h		6 No.		Strandhill	Grant				0
05/348	17 Houses, 4 Apts				Strandhill	Grant		93		93
05/380	Extend ex House				Strandhill	Grant				0
05/387	Fire Station	287 sqm			Strandhill	Grant				0
05/431	Alters to elevations				Strandhill	Grant			2	2
05/600	Retain extns Demolish chimney & bay window				Strandhill	Grant				0
05/775	Extend ex house				Strandhill	Grant				0
05/865	Extend Club House		Demolish damaged building part		Strandhill	Grant				0
05/1047	2 Houses		Demolish ex house		Strandhill	Grant		6		6
05/1130	3 nr. rooflights to front ex house				Strandhill	Grant				0
05/47	commerical		office dev	y	Strandhill	Grant and Commenced				0
05/160	Change hse design (04/31)			y	Strandhill	Grant and Commenced				0
05/296	121 D/H, 3 Aparts, Creche	200 sqm creche		y	Strandhill	Grant and Commenced		372	1	373
05/985	Extend & alter ex house			y	Strandhill	Grant and Commenced				0
06/1193	12 No. Dwellinghouses			y	Strandhill	Grant and Commenced		36		36
2006										

For planning purposes only. Consent of copyright owner required for any other use.

LPA Export 26-07-2013 01:52:04

06/119	F		9	0	Strandhill	Grant				0
06/138	F		0	0	Strandhill	Grant				0
06/183	F		0	0	Strandhill	Grant				0
06/319	F		0	0	Strandhill	Grant				0
06/327	F		0	0	Strandhill	Grant				0
06/329	F		0	0	Strandhill	Grant				0
06/345	R		0	0	Strandhill	Grant				0
06/528	F		20		Strandhill	Grant		60		60
06/563	F		18		Strandhill	Grant		84		84
06/826	F				Strandhill	Grant				0
06/842	F		0	0	Strandhill	Grant				0
06/1062	R				Strandhill	Grant				0
06/1161	F		0	0	Strandhill	Grant				0
06/1164	F		0	0	Strandhill	Grant				0
06/1220	F		0	0	Strandhill	Grant				0
06/1223	F		2	0	Strandhill	Grant				0
06/1291	R		2	0	Strandhill	Grant		6		6
06/1316	F	61 units aparthotel	0	0	Strandhill	Grant		6		6
06/1317	F	Childcare	34		Strandhill	Grant			183	183
2007								102		102
07/1275	F	Guesthouse	1200	Strandhill	FI					
07/22	F		0	Strandhill	FIMA			36	6	42
07/06	F		0	Strandhill	Grant					0
07/38	F	Restuarant	87.3	Strandhill	Grant					0
07/392	F		0	Strandhill	Grant				1	1

For planning purposes only. Consent of copyright owner required for any other use.

LPA Export 26-07-2013 01:52:04

07/39	F			0	Strandhill	Grant		6		6
07/438	F		Change of use to creche	206	Strandhill	Grant			1	1
07/625	R & F			0	Strandhill	Grant				0
07/850	F			0	Strandhill	Grant		6		6
07/876	F			0	Strandhill	Grant				0
07/893	R			0	Strandhill	Grant				0
07/877	F		2 retail units	229	Strandhill	Grant		33	2	35
07/1084	F			0	Strandhill	Grant				0
07/1150	F			0	Strandhill	Grant				0
07/1171	F			0	Strandhill	Grant				0
07/1244	F			0	Strandhill	Grant				0
07/1266	R			0	Strandhill	Grant				0
07/1290	F			0	Strandhill	Grant		6		6

Strandhill

File No.	Status		Decision	ABP Decision	Received Date	Development Address	Description			
86	APPLICATION FINALISED		CONDITIONAL		07/01/2008 Monday	2 The Dunes Strandhill Co. Sligo	construction of extension to side and rear of existing building and associated works			
8155	APPLICATION FINALISED		CONDITIONAL		04/03/2008 Tuesday	Old Airport Road Larass	demolition of existing			

For inspection purposes only. Consent of copyright owner required for any other use.

EPA Export 28-07-2013:01:52:04

							Strandhill	dwelling house, existing garage and the construction of a new replacement dwelling with proposed new sewage treatment system, percolation area and all associated site works	3	3
8411	NEW APPLICATION				02/05/2008 Tuesday	Larass Strandhill Co. Sligo	erection of 2 no. dwelling houses with connections to local authority mains and associated site works	6		6
8327	WITHDRAWN				02/05/2008 Friday	Cerrowbunnaun Strandhill Co. Sligo	(a)demolition of vacant dwelling house and associated shed and (b)construction of 8 no. 4-bedroom two storey semi-detached houses on a	24		24

For inspection purposes only. Consent of copyright owner required for any other use.

EPA Export 28-07-2013:01:52:04

							0.42 hectare site with relocated entrance and all associated site works			
8410	NEW APPLICATION				30/05/2006 Friday	Buenos Ayres Rise (Carrowburnaun) Strandhill Co. Sligo	change and alteration of existing garage to living accommodation, extension of bedroom over existing garage to form a two-storey structure to the same ridgeline as existing dwelling, alteration and extension of dwelling to the rear, construction of a stone facade on front elevation, construction of a new roof over existing flat porch, new slated roof and all associated services	3		3

For inspection purposes only. Consent of copyright owner required for any other use.

EPA Export 26-07-2013:01:52:04

							(Original PL77/6630)			
8172	APPLICATION FINALISED		CONDITIONAL		12/03/2008 Wednesday	Kilaspugbrone Strandhill Co. Sligo	retention of existing cottage and associated site works as constructed in revised location including revised site boundaries			
8256	APPLICATION FINALISED		CONDITIONAL		11/04/2008 Friday	16 Kilnrone Drive Strandhill Sligo	construction of (1) an extension to the rear elevation of dwelling house, (2) retention of conversion of the attic space, into a habitable space in the existing dwelling house (3) to close up the existing porch on the front elevation, plus ancillary site works	3		

For inspection purposes only. Consent of copyright owner required for any other use.

EPA Export 26-07-2013:01:52:04

							Sum:	384	193	644

For inspection purposes only.
Consent of copyright owner required for any other use.

EPA Export 26-07-2013:01:52:04

ATTACHMENT No: B.10
CAPITAL INVESTMENT PROGRAMME

For inspection purposes only.
Consent of copyright owner required for any other use.

EPA Export 26-07-2013:01:52:04

Sligo

Water Services Investment Programme 2007 - 2009

	W/S	Est. Cost.
Schemes at Construction		
Sligo & Environs Water Supply Scheme Stage 2 (G)	W	14,700,000
Sligo Wastewater Treatment Plant (DBO Contract)(G)	S	24,000,000
		38,700,000
Schemes to start 2007		
Enniscrone Sewerage Scheme	S	3,100,000
		3,100,000
Schemes to start 2008		
Ballygawley, Mullaghmore, Ballinacarrow* & Cliffoney* Grouped Sewerage Scheme	S	6,500,000
Mullaghmore Water Supply Scheme Stage 2	W	1,430,000
Sligo Sewerage Scheme (Network Improvement)(G)	S	5,300,000
		13,230,000
Schemes to start 2009		
Carrowroe Sewerage Scheme	S	2,300,000
Lough Talt Water Supply Scheme	W	1,870,000
Rosses Point/ Cregg/ Ballincar Sewerage Scheme	S	4,500,000
		8,670,000
Serviced Land Initiative		
Grange, Strandhill & Tubbercurry Grouped Sewerage Improvement Scheme	S	4,250,000
Teesan/Lisnalurg Sewerage Scheme	S	1,420,000
Ballinacarrow Sewerage Scheme*	S	-
Cliffoney Sewerage Scheme*	S	-
*Previously listed with grouped scheme above		**5,670,000**
Schemes to Advance through Planning		
Ballymote Sewerage Scheme (Upgrade)	S	5,000,000
Collooney Sewerage Scheme (Upgrade)	S	5,000,000
North Sligo Regional Water Supply Scheme Phase 2	W	3,570,000
Sligo & Environs Water Supply Scheme Phase 3 (G)	W	4,080,000
		17,650,000
Water Conservation Allocation		**2,652,000**
Asset Management Study		**60,000**
Programme Total		**89,732,000**

(G) Refers to Gateway as designated in the National Spatial Strategy

Consent of copyright owner required for any other use. For inspection purposes only.

EPA Export 26-07-2013:01:52:04

ATTACHMENT No: B.11 - NOT APPLICABLE
SIGNIFICANT CORRESPONDANCE

For inspection purposes only. Consent of copyright owner required for any other use.

EPA Export 26-07-2013:01:52:04

ATTACHMENT No: B.12
FORESHORE ACT LICENCE

An Roinn Cumarsáide
Mara agus Acmhainní Nádúrtha
Baile Átha Cliath 2

Department of Communications,
Marine and Natural Resources
Dublin 2

30 June 2003

Our Ref: MS51/14/145
(Please quote on all correspondence)

Mr Bartley Gavin
Sanitary Services
Sligo County Council
Market Yard
Sligo

SEWAGE TREATMENT WORKS AT STRANDHILL, CO. SLIGO

Dear Bartley

I refer to previous correspondence regarding the above and am pleased to inform you that the Minister of State has approved a Foreshore Licence for the above Scheme. A copy of the Site Specific Conditions, as approved, is attached.

I have asked the Office of the Chief State Solicitor to draw up the Licence and that Office will correspond directly with Solicitors for Sligo County Council.

Thank you for your assistance in the matter.

Yours sincerely

Marie Flynn

Marie Flynn
Coastal Zone Management Division
Tel No. 01 6782135
e-mail: marie.flynn@dcmnr.gov.ie

For inspection purposes only.
Consent of copyright owner required for any other use.

EPA Export 26-07-2013:01:52:04

Leeson Lane, Dublin 2
Lána Chill Mochargán
Baile Átha Cliath 2

Telephone: +353 1 678 2000
LoCall 1890 44 99 00
Fax: +353 1 678 2449

email: contact@dcmnr.gov.ie
GTN: 1-1-1

G:\WP\COUNTY\SLIGO\145.doc

EPA Export 26-07-2013:01:52:04

RETENTION OF SEWAGE OUTFALL PIPE AT STRANDHILL CO SLIGO - SPECIFIC CONDITIONS

1. (a) The Licensee shall use that part of the foreshore, the subject matter of this Licence, for the purpose of using and maintaining the aforementioned outfall pipe, as described in 1:10560 Drawing Number 01 of 03 dated 08 May 2001 with attached extract from OS map and sectional drawing, and for no other purpose whatsoever.

   (b) The Licensee may also use the adjacent foreshore but only to the extent necessary for the purpose of using and maintaining the said outfall pipe and shall restore the said foreshore to its proper condition immediately after such use.

2. The Licensee shall, at all times during the continuance of this Licence, keep the said outfall pipe in a good and proper state of repair and condition to the satisfaction of the Licensor and ensure that it will not be injurious to navigation, fisheries, the adjacent lands or the public interest.

3. The Licensee shall provide a level of secondary treatment to a standard which shall ensure a concentration of effluent discharge that shall not exceed 25:35 (BOD:SS)

4. The Licensee shall : -

   - ensure that the secondary treatment works connecting to the outfall pipeline the subject of this Licence are designed to accommodate and treat to the required secondary standard an inflow of 3 D.W.F. (Dry Weather Flow) where 1 D.W.F. is defined as being for a p.e. of 4500;
   - submit details of treatment plant provisions designed to meet this capacity requirement and obtain prior approval from the Department of Communications, Marine and Natural Resources for same before construction;
   - ensure that there is sufficient storage capacity in the System to contain all sewage for treatment prior to discharge via the aforementioned outfall pipe.

5. The Licensee shall ensure that the design of the secondary treatment works connecting to the outfall pipeline the subject of this Licence facilitates the future fitting of Ultra Violet (U.V.) treatment facilities or equivalent treatment system, in the event that the Licensor so requires. The installation and operation of any such system shall be in accordance with such standards as may be specified by the Licensor from time to time.

6. Should a statutory viral classification system be laid down for molluscan production areas in the vicinity of the discharge point, this Licence may be revised and amended as necessary to take this into account.

Molluscan Production

7. The Licensee shall comply with any conditions that the **Heritage and Planning Division** of the Department of the Environment, Heritage and Local Government may lawfully impose.

8. The Licensee shall inform the British Admiralty Hydrographic Office of the nature and location of the outfall pipe.

9. The Licensee shall ensure that the outfall pipe is adequately marked for navigation and shall apply to the Commissioners of Irish Lights for sanction of new navigational aids/buoyage and/or alteration of existing navigational aids/buoyage.

10. The Licensee shall indemnify and keep indemnified the State and the Minister for Communications, Marine and Natural Resources, their officers, agents and employees against all actions, loss, claims, damages, costs, expenses and demands arising in any manner whatsoever in connection with the construction, maintenance or use of the said structure or in the exercise of the permission hereby granted.

11. The Licensor shall be at liberty at any time to terminate this Licence by giving to the Licensee three months previous notice in writing, ending on any day and upon determination of such notice, the licence and permission hereby granted shall be deemed to be revoked and withdrawn without liability for the payment of any compensation by the Licensor to the Licensee.

12. The Licensee shall if so required by the Licensor within twelve months after receipt of such notice or on determination of this Licence from any other cause at its own expense, remove the said structures and restore the foreshore in question to the satisfaction of the Licensor and if the Licensee refuses or fails to do so, the Licensor may cause the said works to be removed and the foreshore in question restored and shall be entitled to be paid by and to recover from the Licensee, as a civil debt due to the State, all costs and expenses incurred by him in connection with such removal and restoration.

13. In the event of the breach, non-performance or non-observance by the Licensee of any of the conditions herein contained, the Licensor may forthwith terminate this Licence without prior notice to the Licensee.

14. The Licensor reserves the right to review and amend the terms of this Licence based on the results of any monitoring programme or other relevant information that becomes available.

15. Any notice to be given by the Licensor may be transmitted through the Post Office addressed to the Licensee at its last known address.

Consent of copyright owner required for any other use. For inspection purposes only.
EPA Export 26-07-2013:01:52:04

ATTACHMENT No: C.1
OPERATIONAL INFORMATION REQUIREMENTS

For inspection purposes only.
Consent of copyright owner required for any other use.

EPA Export 26-07-2013:01:52:04

ATTACHMENT No: C1
OPERATIONAL INFORMATION REQUIREMENTS

C.1.1 Storm Water Overflows

Not Applicable

C.1.2 Pumping Stations

As part of the contract the pumping stations in Strandhill are to be upgraded to include the following:

- High level alarm
- Pump malfunction alarm
- Upgrade of all mechanical and electrical facilities to ensure compliance with the latest Electrical and Health and Safety standards.
- Lockable manhole covers for all manholes within the boundary of the pump station site
- Passive odour control
- Flow measurement on rising main (with instantaneous and totalised flow readings sent to SCADA system)
- Washpoint (Hose and Reel)
- Storm storage tank at the West End Pumping Station

For inspection purposes only.
Consent of copyright owner required for any other use.

The outlying pumping stations shall be provided with standby generators with automatic starting in case of power failure. The pumping stations shall also have dial-out alarm systems to ensure a callout in case of pump failure and/or high level in the pump sumps or storm tanks.

Sligo Road Pumping Station

- Minimum pumping capability of 5 l/ s
- Storm overflow screens
- Storm overflow alarm
- Storm overflow volumetic and time measurement

EPA Export 26-07-2013:01:52:05

The Airport Pumping Station

- Minimum pumping capability of 1 l/ s

West End Pumping Station

- Minimum pumping capability of 5 l/ s

For inspection purposes only.
Consent of copyright owner required for any other use.

EPA Export 26-07-2013:01:52:05

Further Details of Plant and Process

1 Strandhill Wastewater Treatment Works Overview

1.1 Introduction

The process at the upgraded Strandhill Wastewater Treatment Works will be conventional activated sludge treatment. The plant is designed to treat loads up to 3 DWF. The description below is in regard to the upgraded treatment works.

1.2 Overview of the wastewater line of Strandhill WWT

The upgraded Strandhill Wastewater treatment process will incorporate the following components:

- Inlet Works Flow Measurement
- Inlet Screening
- Screenings conditioning and compacting
- Grit removal system
- Grit classifier and washing equipment
- Forward Feed/Storm Pumping Station
- Storm water tank
- 2 No. Aeration Tanks comprising fine bubble diffused aeration systems
- Sludge Recirculation pumps with flow measurement and control
- 2 No. secondary clarifiers
- Treated Effluent pumping flow measurement
- Sludge Thickening and dewatering facilities

The plant has a design capacity of 4500pe and a design effluent quality of 25 mg/l BOD and 35 mg/l suspended solids.

For inspection purposes only.
Consent of copyright owner required for any other use.

EPA Export 26-07-2013:01:52:05

Table 1 - Summary of the Wastewater Treatment Plant Parameters

Wastewater Treatment Plant Parameter	Value
Population equivalent	4500
BOD (kg/d)	337.5
Dry weather flow (m^3/day)	1011
Peak Flow to Full Treatment (m^3/day)	3041
Storm water storage capacity (m^3)	253

For inspection purposes only.
Consent of copyright owner required for any other use.

EPA Export 26-07-2013:01:52:05

1.3 Inlet Works (A)

The inlet works will consist of the following:

- Inlet Flow Measurement and Sampling
- Automatic screen and a by-pass manual screen
- Vortex pista design grit removal system
- Grit Classifier
- Combined Foul/Storm Pumping Station

1.4 Aeration Basins (B)

Two aeration basins will be used for biological treatment. Each aeration basin will be fitted with a bottom installed diffuser matrix.

1.5 Clarifiers (C)

Two circular clarifiers with half bridge scrapers will be used to separate the activated sludge from the clarified effluent.
For each tank, sludge will be drawn from the bottom of the tank, with Return Activated Sludge being pumped back to the head of the aeration chamber and excess sludge pumped to the Picket Fence Thickener.

For inspection purposes only.
Consent of copyright owner required for any other use.

1.6 Picket Fence Thickener Tank (D)

Excess sludge will be wasted from the system to a Picket Fence Thickener Tank, which will thicken the sludge to a dry solids content of 3-5%.

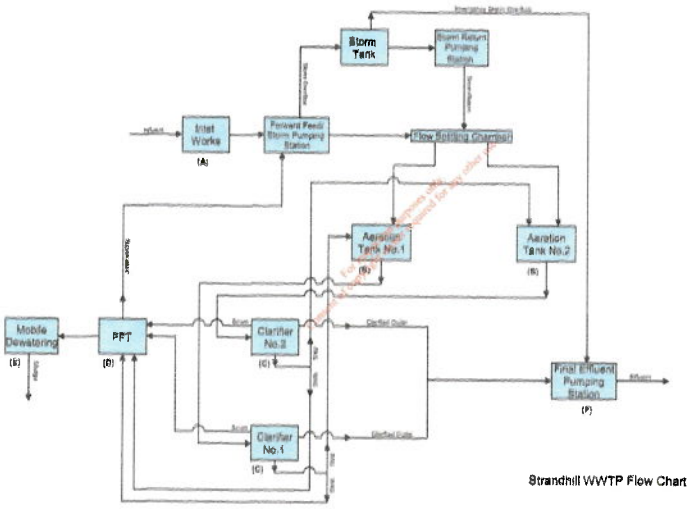
1.7 Sludge Dewatering (E)

A temporary mobile centrifuge will be used to to comply with the 18 % dry solids required under the terms of the contract.

1.8 Final Effluent Pumping and Sampling (F)

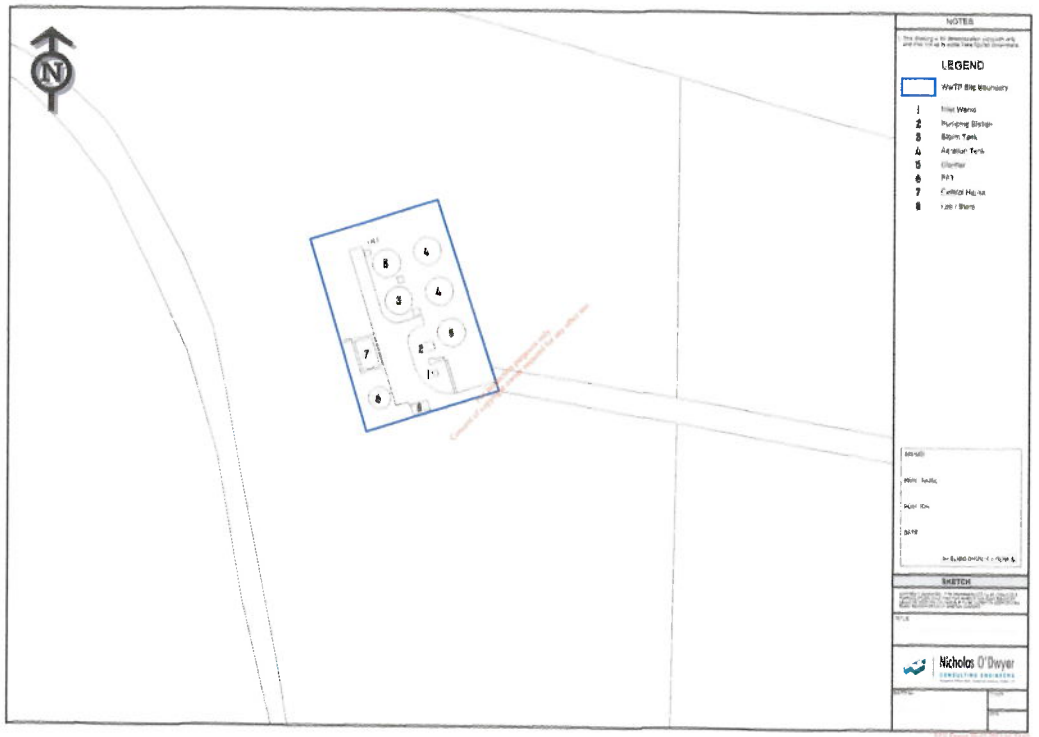
A final effluent pumping station will be installed at the outlet from the works to allow pumping of the effluent in the case of high tides.

EPA Export 26-07-2013:01:52:05



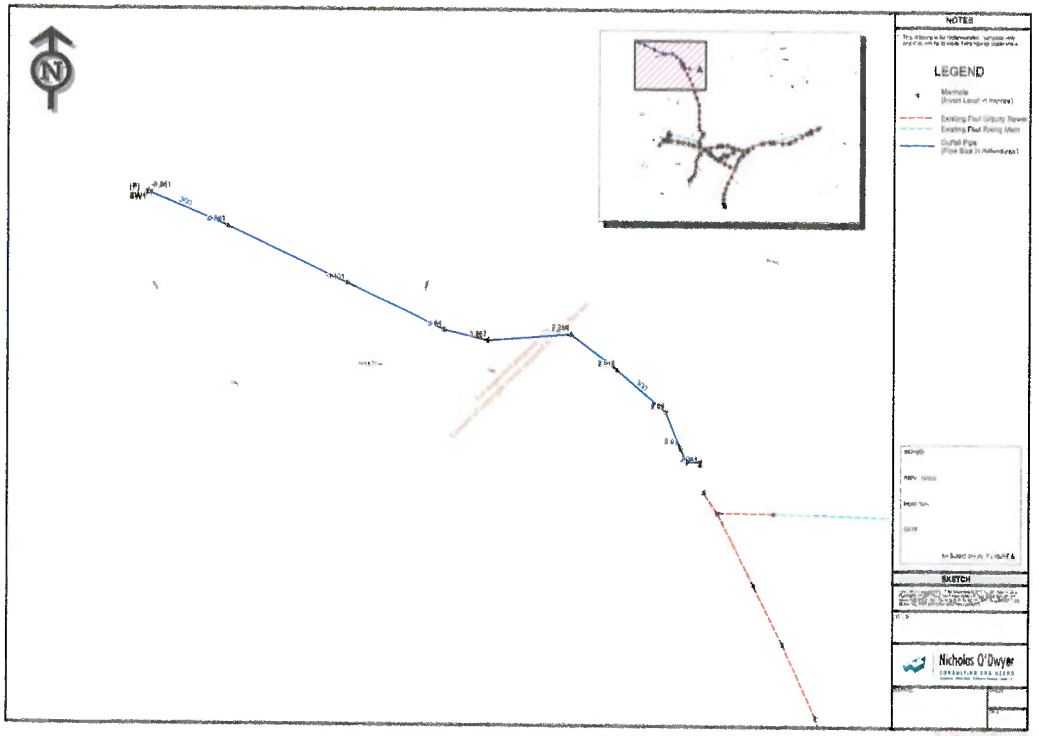
Strandhill WWTP Flow Chart

EPA Export 26-07-2013:01:52:05



ATTACHMENT No: C.2
OUTFALL DESIGN AND CONSTRUCTION

For inspection purposes only.
Consent of copyright owner required for any other use.



LPA Export 26-07-2013 01:52:05

ATTACHMENT D1
DETAILS OF INFLUENT

For inspection purposes only.
Consent of copyright owner required for any other use.

EPA Export 26-07-2013:01:52:05

Flow & Load Report

Strandhill

Wastewater Treatment Plant, Co. Sligo

June 2008

For inspection purposes only.
Consent of copyright owner required for any other use.

Bridge House, Lackagh, Drumfin, Sligo - Number 234324 TEL: 1850 266 266
info@treatchem.com Int: +353 71 9127256 Fax: 0865 2611632 V.A.T. Reg. No.:
IE8234324D Managing Director Paul O'Dwyer Nutrisolv Ireland Ltd. trading as
ENSEN

EPA Export 26-07-2013:01:52:05

Site ID:
200508SHL/06/08

Client:
Nicholas O'Dwyer Consulting Engineers
Nutgrove House
Nutgrove Avenue
Dublin 14

Job number	200508SHL
Quotation number	NQ200508
Date of commencement	25 June 2008
Nutrisolv project manager	Mr. S. Reid
Number of monitoring locations	2

For inspection purposes only. Consent of copyright owner required for any other use.

Sampling locations:

Site 1: Influent, Flow Monitoring & Sampling Strandhill Wastewater Treatment Plant
Site 2: Effluent, Flow Monitoring & Sampling Strandhill Wastewater Treatment Plant

EPA Export 26-07-2013:01:52:05

Introduction

The Strandhill 2 day flow and load survey was conducted as part of the County Sligo Monitoring Survey for Waste Water Discharge License Applications.

All monitoring locations were agreed with the engineer prior to commencement of the programme. The Strandhill monitoring programme was part of Set 1 of 3 as determined by the tender documentation.

A pre-monitoring site investigation was conducted prior to installation at Strandhill and it was agreed that flow monitoring and sampling would be conducted on both the influent and effluent lines to the treatment plant. A raingauge was installed for the duration of the monitoring programme.

For inspection purposes only. Consent of copyright owner required for any other use.

EPA Export 26-07-2013:01:52:05

1.0 Monitoring Programme - location & objectives:

1. Take flow proportional samples from the influent and effluent lines to the Strandhill WWTP.
2. Monitor flow at the influent and effluent lines to Strandhill WWTP.
3. Have all samples tested for the listed parameters.
4. Record relevant site notes on observations made during the course of the monitoring period.

Flows were recorded using an Isco 750 Area Velocity flow modules and probes. Data was recorded at 2 minute intervals and hourly and daily summaries were compiled. Samples were taken using Isco 6712 programmable samplers. Were appropriate, the sampler was connected to the flow meter and operated on a flow proportional basis.

Recorded daily flows and analytical data are given in this report. Reference should be made to the attached files '200508, County Sligo DL, Set 1, Flow Data, 06/08.xls' and '200508, County Sligo DL, Set 1, Analytical Data, 06/08.xls'.

Note: Reference should be made to all site notes in section 3.

For inspection purposes only. Consent of copyright owner required for any other use.

EPA Export 26-07-2013:01:52:05

Plate 1: Strandhill WWTP Influent Sampling Location



Plate 2: Strandhill WWTP Effluent Sampling & Flow Monitoring Location



For inspection purposes only. Consent of copyright owner required for any other use.

Bridge House, Lackagh, Drumfin, Sligo - Number 234324 TEL: 1850 266 266
info@treatchem.com Int: +353 71 9127256 Fax: 0865 2611632 V.A.T. Reg. No.:
IE8234324D Managing Director Paul O'Dwyer Nutrisolv Ireland Ltd. trading as
ENSEN

EPA Export 26-07-2013:01:52:05

2.0 Results

2.1 Strandhill WWTP Influent Data

2.1.1 Daily Flow and Analytical Data

Table 1: Daily Flow & Load Values for Strandhill WWTP Influent Stream

Date	Cert No.	Daily Flow (m3)	COD Load (kg)	BOD Load (kg)
23-24.06.08	14507	263.36	161.44	69.00
24-25.06.08	14518	354.38	258.34	83.63

Table 2: Daily Analytical Results for Strandhill WWTP Influent Stream

Parameter	Units	Result	Result
pH	units	7.2	7.2
Temperature	oC	9.5	9.5
Ammonia	mg/l as NH3	20.1	22.2
Total-P	mg/l as P	8.82	9.03
Ortho-P	mg/l as PO4	5.07	3.49
Conductivity	µs/cm	952	423.5
Nitrate	mg/l as N	2.2	1.8
Nitrite	mg/l as N	0.005	0.035
Total Nitrogen	mg/l as N	82.22	4.875
Sulphate	mg/l as SO4	72.54	52.3
T.S.S	mg/l	267	375
Hardness	mg/l	N/R	N/R
Phenols	mg/l	0.02	0.05
Antrazine	µg/l	<1	<1
Simazine	µg/l	<1	<1
Dichloromethane	µg/l	<1	<1
Toluene	µg/l	<1	<1
Xylene	µg/l	<1	<1
Tributyltin	µg/l	<0.02	<0.02
Arsenic	mg/l	0.009	0.002
Chromium	mg/l	0.004	0.003

For inspection purposes only.
Consent of copyright owner required for any other use.

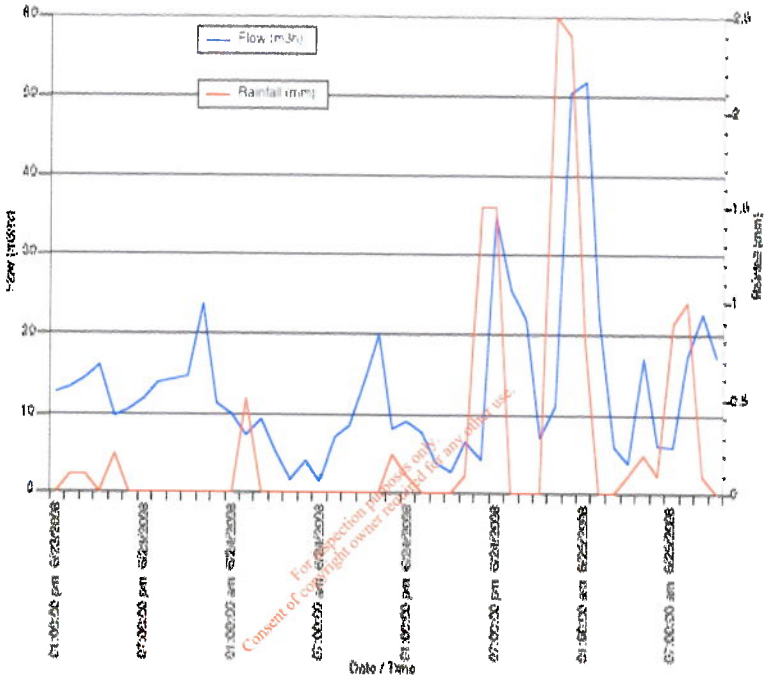
EPA Export 26-07-2013:01:52:05

Copper	mg/l	0.14	0.089
Cyanide	mg/l	<0.05	<0.05
Fluoride	mg/l	0.8	0.68
Lead	mg/l	0.036	0.009
Zinc	mg/l	0.46	0.245
Nickel	mg/l	0.005	0.005
Boron	mg/l	0.03	<0.01
Cadnium	mg/l	0.0041	0.0019
Mercury	mg/l	<0.0001	<0.0001
Selenium	mg/l	0.001	<0.001
Barium	mg/l	0.19	0.07
BOD5	mg/l	262	236
COD	mg/l	613	729

For inspection purposes only.
Consent of copyright owner required for any other use.

EPA Export 26-07-2013:01:52:05

Graph 1: Strandhill Influent Hrly Flow v Rainfall, 23-25 June 2008



For inspection purposes only.
Consent of copyright owner required for any other use.

EPA Export 26-07-2013:01:52:05

2.2 Strandhill WWTP Effluent Data

2.2.1 Daily Flow and Analytical Data

Table 3: Daily Flow & Load Values for Strandhill WWTP Effluent Stream

Date	Cert No.	Daily Flow (m3)	COD Load (kg)	BOD Load (kg)
23-24.06.08	14508	297.92	49.16	24.13
24-25.06.08	14519	391.38	53.23	16.44

Table 4: Daily Analytical Results for Ballisodare WWTP Effluent Stream

Parameter	Units	Result	Result
pH	units	7.1	7.2
Temperature	oC	10.5	10
Ammonia	mg/l as NH3	6.85	4.4
Total-P	mg/l as P	5.22	4.5
Ortho-P	mg/l as PO4	3.2	2.7
Conductivity	µs/cm	864	N/R
Nitrate	mg/l as N	5.7	7.4
Nitrite	mg/l as N	1.04	0.425
Total Nitrogen	mg/l as N	29.3	14.11
Sulphate	mg/l as SO4	71.55	53.79
T.S.S	mg/l	98	78
Hardness	mg/l	N/R	N/R
Phenols	mg/l	<0.01	<0.01
Antrazine	µg/l	<1	<1
Simazine	µg/l	<1	<1
Dichloromethane	µg/l	<1	<1
Toluene	µg/l	<1	<1
Xylene	µg/l	<1	<1
Tributyltin	µg/l	<0.02	<0.02
Arsenic	mg/l	0.005	0.002
Chromium	mg/l	0.003	0.002
Copper	mg/l	0.055	0.05
Cyanide	mg/l	<0.05	<0.05

Consent of copyright owner required for any other use.
For inspection purposes only.

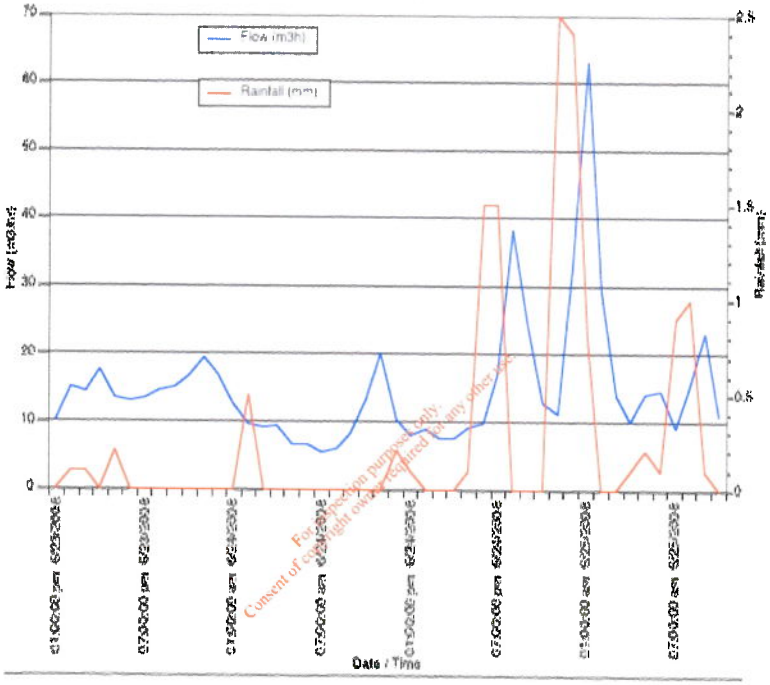
EPA Export 26-07-2013:01:52:05

Fluoride	mg/l	0.71	0.84
Lead	mg/l	0.008	0.002
Zinc	mg/l	0.115	0.077
Nickel	mg/l	0.003	0.003
Boron	mg/l	0.03	<0.01
Cadnium	mg/l	0.001	0.0005
Mercury	mg/l	<0.0001	<0.0001
Selenium	mg/l	0.001	<0.001
Barium	mg/l	0.03	0.02
BOD5	mg/l	81	42
COD	mg/l	165	136

For inspection purposes only.
Consent of copyright owner required for any other use.

EPA Export 26-07-2013:01:52:05

Graph 2: Strandhill Effluent Hrly Flow v Rainfall, 23-25 June 2008



For inspection purposes only.
Consent of copyright owner required for any other use.

EPA Export 26-07-2013:01:52:05

General Materials and Methods

Flow meters: Nutrisolv F&L surveys are conducted using a variety of equipment for measuring flow.

- Area velocity probes.
- Flow inserts with bubbleometer depth measurement.
- Pump station monitors.
- Ultrasonic level detectors

In each case the parameter measured is logged as raw data and converted to flow using an appropriate mathematical algorithm.

Samplers used are peristaltic pump based 24 bottle and singfe bottle samplers. Samplers will take flow or time paced samples. A very wide range of sample types can be accommodated.

Other monitors:
A range of parameters can also be logged - pH, Turbidity, rainfall, Dissolved Oxygen.

Additional parameters by request.

For inspection purposes only. Consent of copyright owner required for any other use.

EPA Export 26-07-2013:01:52:05

3. Site Notes

A pre-survey site investigation was conducted on 11 June 2008. The site was checked for suitability, representation and safety for both personnel and equipment.

After consideration of the proposed monitoring sites and the possible limitations, it was agreed with Sinead Hanrahan to proceed with flow monitoring and sampling on both the influent and effluent lines to the plant.

Installation and decommissioning notes are given below. Further site notes are given only when deviations occured from the normal operation of the monitoring programme.

Installation: 23 June 2008

Influent: Sampler and flowmeter (AV probe) installed and programmed to take flow proportional samples over a 24hr period. Flow meter callibrated prior to installation.
Instant flow: 12.511 m3/hr

Effluent: AV probe flow monitor was calibrated and installed. Sampler was programmed to take flow proportional samples over a 24hr period.
Instant flow: 10.733 m3/hr.

Decommission: 25 June 2008

Re-calibration of the flow meter gave a 0% calibration deviation on the both the influent and effluent flow meters.

All samples and volumes were taken correctly.

For inspection purposes only. Consent of copyright owner required for any other use.

EPA Export 26-07-2013:01:52:05

ATTACHMENT D2
DETAILS OF DISCHARGE POINTS

For inspection purposes only.
Consent of copyright owner required for any other use.

EPA Export 26-07-2013 01:52:05

Strandhill - WWDL Attachment D.2

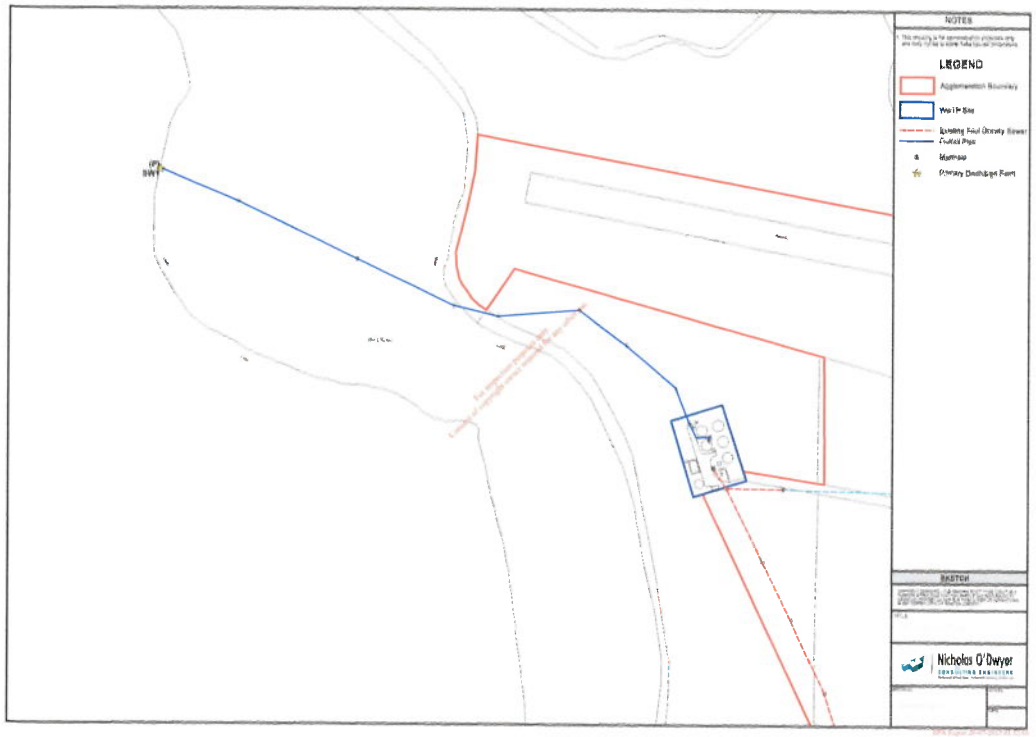
PT_CD	PT_TYPE	LA_NAME	RWB_TYPE	RWB_NAME	DESIGNATION	EASTING	NORTHING	VERIFIED
SW1	Primary	Sligo County Council	Coastal	Sligo Bay	n/a	160057	337116	Y

For inspection purposes only.
Consent of copyright owner required for any other use.

Sligo County Council Page 41 of 61

EPA Export 26-07-2013 01:52:05

ATTACHMENT E2
PROGRAMMES FOR ENVIRONMENTAL MONITORING, SAMPLING METHODS, ANALYTICAL AND QUALITY CONTROL PROCEDURES



For inspection purposes only.
Consent of copyright owner required for any other use.

LPA Export 26-07-2013 01:52:05

ATTACHMENT E3
DETAILS OF MONITORING AND SAMPLING POINTS

STRANDHILL URBAN WASTEWATER TREATMENT PLANT

Monitoring and Sampling Points

Sample Frequency: *Monthly Composite on final effluent discharge

Final Effluent Sampling Point: Final effluent sampling chamber
Co-ordinates: 160617, 336814

Receiving Water: Coastal Discharge

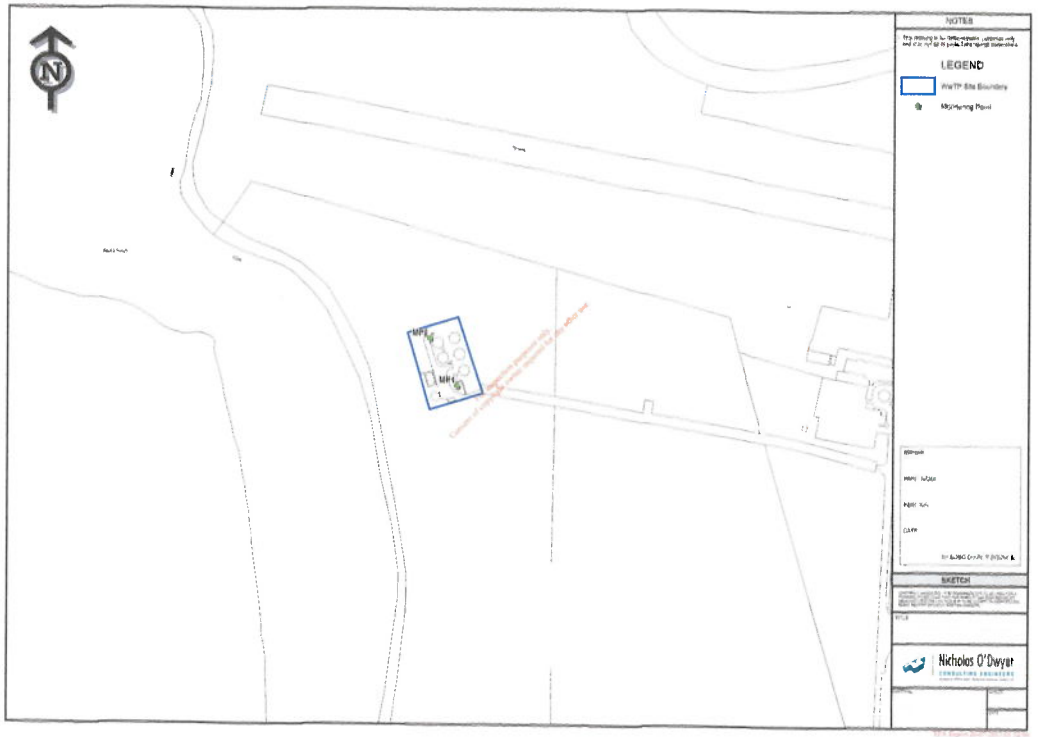
Parameters Analysed

Parameter	Method	Analytical and Quality Control Procedures
Biochemical Oxygen Demand	DO Electrode	In house QC procedures are in place for all parameters tested, these include calibration of equipment used, and the use of independent check standards / QC Charts for each parameter analysed. The lab also participates in the EPA inter-calibration programme. Annual service contracts are in place for the calibration and maintenance of all equipment used in the lab.
Chemical Oxygen Demand	HACH	
Suspended Solids	Gravimetric	
pH	WTW pH meter/electrode	
Conductivity	WTW Conductivity meter/electrode	
Ortho-phosphate	Konelab Autoanalyser	

*Flow Proportional composite samplers need to be installed on the final effluent discharge point, until this happens, only grab samples can be taken.

For inspection purposes only.
Consent of copyright owner required for any other use.
For inspection purposes only.
Consent of copyright owner required for any other use.
EPA Export 26-07-2013:01:52:05
EPA Export 26-07-2013:01:52:06

PT_CD	PT_TYPE	MON_TYPE	EASTING	NORTHING	VERIFIED
MP2	Primary	M	160596	336859	Y
MP1	Primary	M	160624	336811	Y



For inspection purposes only.
Consent of copyright owner required for any other use.

EPA Export 26-07-2013:01:52:06

ATTACHMENT E4
SAMPLING DATA

Name	Station	Sample Date	BOD mg/l	COD mg/l	Conductivity @ 20°C	Nitrates(N) mg/l	Nitrites (N) mg/l	Ortho-phosphate mg/l	pH	SS mg/l	TON mg/l
Strandhill	Outlet	04/05/2007	149	373	1205	0.02	0.01	NT	7.75	108	0.03
Strandhill	Outlet	15/08/2007	116	336	1110	NT	NT	1.986	7.21	150	NT
Strandhill	Outlet	20/09/2007	88.4	360	1007	<0.001	0.009	0.647	7.52	134	0.01
Strandhill	Outlet	25/10/2007	44	169	762	43.998	0.282	5.221	6.51	44	44.28
Strandhill	Outlet	04/03/2008	106	188	799	0	0.05	1.326	7.26	70	0.03
AVERAGE			100.34	285.00	976.80	14.67	0.09	2.27	7.25	100.80	11.09

For inspection purposes only.
Consent of copyright owner required for any other use.

EPA Export 26-07-2013:01:52:06

Strandhill – WWDL

Attachment E.4

For inspection purposes only.
Consent of copyright owner required for any other use.

EPA Export 26-07-2013:01:52:06

ATTACHMENT F1
IMPACT ON RECEIVING WATERS

For inspection purposes only.
Consent of copyright owner required for any other use.

EPA Export 26-07-2013:01:52:06

ATTACHMENT No: F. 1
ASSESSMENT OF IMPACT ON RECEIVING WATER

F.1. Assessment of Impact on Receiving Surface or Ground Water

- Give summary details and an assessment of the impacts of any existing or proposed emissions on the environment, including environmental media other than those into which the emissions are to be made.

Strandhill WwTP is located within Cumeen Strand/Drumcliff Bay (Sligo Bay) SAC and within the Sligo and Drumcliff Bay NHA. Strandhill WwTP discharges to the sea at Kilnaspug point, which is located outside the SAC and NHA. The upgrade to the plant will ensure that effluent is treated to a high quality ensuring the integrity of the SAC and NHA is maintained.

- Tables F.1(I)(a) & (b) should be completed for the primary discharge point. Surface water monitoring locations upstream and downstream of the discharge point shall be screened for those substances listed in Tables F.1(I)(a) & (b). Monitoring of surface water shall be carried out at not less than two points, one upstream from the discharge location and one downstream.

These tables are completed in the Annex to the Application.

- For discharges from secondary discharge points Tables F.1(II)(a) & (b) should be completed. Furthermore, provide summary details and an assessment of the impacts of any existing or proposed emissions on the surface water or ground (aquifers, soils, sub-soils and rock environment), including any impact on environmental media other than those into which the emissions are to be made.

Not Applicable

- Provide details of the extent and type of ground emissions at the works. For larger discharges to groundwaters, e.g., from Integrated Constructed Wetlands, large scale percolation areas, etc., a comprehensive report must be completed which should include, inter alia, topography, meteorological data, water quality, geology, hydrology, and hydrogeology. The latter must in particular present the aquifer classification and vulnerability. The Geological Survey of Ireland Groundwater Protection Scheme Dept of the Environment and Local Government, Geological Survey of Ireland, EPA (1999) methodology should be used for any such classification. This report should also identify all surface water bodies and water wells that may be at risk as a result of the ground discharge.

Not Applicable

EPA Export 26-07-2013:01:52:06

- Describe the existing environment in terms of water quality with particular reference to environmental quality standards or other legislative standards. Submit a copy of the most recent water quality management plan or catchment management plan in place for the receiving water body. Give details of any designation under any Council Directive or Regulations that apply in relation to the receiving water.

Strandhill WwTP is located within Cumeen Strand/Drumcliff Bay (Sligo Bay) SAC and within the Sligo and Drumcliff Bay NHA. Strandhill WwTP discharges to the sea at Kilnaspug point, which is located outside the SAC and NHA. The upgrade to the plant will ensure that effluent is treated to a high quality ensuring the integrity of the SAC and NHA is maintained.

- Provide a statement as to whether or not emissions of main polluting substances (as defined in the *Dangerous Substances Regulations S.I. No. 12 of 2001*) to water are likely to impair the environment.

Monitoring for dangerous substances in the final effluent was carried out on two occasions. An average of both results was taken and is tabulated in Table D1.

Concentrations of Table 1 parameters, Pesticides and Solvents in the final effluent are lower than the prescribed maxima for tidal waters for all parameters.

Concentrations of Table 2 parameters, Metals and Other Substances in the final effluent, are lower than the prescribed maxima for tidal waters in all cases except for Copper and Zinc as can be seen from the Table below.

In relation to the concentration of Copper in the final effluent, this is only very slightly above the level allowed in tidal waters under Irish Legislation. In relation to Zinc, the level in the final effluent is approximately twice the level allowed in tidal waters.

As the Strandhill WwTP discharges to the open sea, dilution and flushing will ensure that these emissions will not impair the environment.

	Dangerous Substances Regulations Value NB for TIDAL WATERS	Measured Effluent Concentration	Comment	Calculated Effluent Load	Calculated Effluent Load
Parameter	mg/l	mg/l		mg/d	kg/d
Copper	0.005	0.053	POTENTIALLY HIGH	33.708	0.034
Arsenic	0.02	0.004	OK	2.544	0.003
Chromium	0.015	0.003	OK	1.908	0.002
Cyanide	0.01	<0.05			
Flouride	1.5	0.775	OK	492.900	0.493
Lead	0.005	0.005		3.180	0.003
Nickel	0.025	0.003	OK	1.908	0.002
Zinc	0.04	0.096	POTENTIALLY HIGH	61.056	0.061

- In circumstances where water abstraction points exist downstream of any discharge describe measures to be undertaken to ensure that discharges from the waste water works will not have a significant effect on faecal coliform, salmonella and protozoan pathogen numbers, e.g., Cryptosporidium and Giardia, in the receiving water environment.

Not Applicable

- Indicate whether or not emissions from the agglomeration or any plant, methods, processes, operating procedures or other factors which affect such emissions are likely to have a significant effect on –

  (a) a site (until the adoption, in respect of the site, of a decision by the European Commission under Article 21 of Council Directive 92/43/EEC for the purposes of the third paragraph of Article 4(2) of that Directive) —

  (i) notified for the purposes of Regulation 4 of the Natural Habitats Regulations, subject to any amendments made to it by virtue of Regulation 5 of those Regulations,

  (ii) details of which have been transmitted to the Commission in accordance with Regulation 5(4) of the Natural Habitats Regulations, or

  (iii) added by virtue of Regulation 6 of the Natural Habitats Regulations to the list transmitted to the Commission in accordance with Regulation 5(4) of those Regulations,

  (b) a site adopted by the European Commission as a site of Community importance for the purposes of Article 4(2) of Council Directive 92/43/EEC[1] in accordance with the procedures laid down in Article 21 of that Directive,

  (c) a special area of conservation within the meaning of the Natural Habitats Regulations, or

Consent of copyright owner required for any other use. For inspection purposes only. For any other use please contact the copyright owner.

EPA Export 26-07-2013:01:52:06

(d) an area classified pursuant to Article 4(1) or 4(2) of Council Directive 79/409/EEC[2];

[1]Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora (OJ No. L 206, 22.07.1992)

[2]Council Directive 79/409/EEC of 2 April 1979 on the conservation of wild birds (OJ No. L 103, 25.4.1979)

Strandhill WwTP is located within Cumeen Strand/Drumcliff Bay (Sligo Bay) SAC and within the Sligo and Drumcliff Bay NHA. Strandhill WwTP discharges to the sea at Kilnaspug point, which is located outside the SAC and NHA. The upgrade to the plant will ensure that effluent is treated to a high quality ensuring the integrity of the SAC and NHA is maintained.

- Describe, where appropriate, measures for minimising pollution over long distances or in the territory of other states.

Not Applicable.

- This section should also contain full details of any modelling of discharges from the agglomeration. Full details of the assessment and any other relevant information on the receiving environment should be submitted as **Attachment F.1.**

Modelling of the discharges from the agglomeration has not been carried out.

For inspection purposes only. Consent of copyright owner required for any other use.

EPA Export 26-07-2013:01:52:06

3/4

ATTACHMENT F2 – NOT APPLICABLE
LOCATION OF DRINKING WATER ABSTRACTION POINTS

For inspection purposes only. Consent of copyright owner required for any other use.

EPA Export 26-07-2013:01:52:06

ATTACHMENT G1
COMPLIANCE WITH COUNCIL DIRECTIVES

For inspection purposes only.
Consent of copyright owner required for any other use.

EPA Export 26-07-2013:01:52:06

ATTACHMENT No: G. 1

COMPLICANCE WITH COUNCIL DIRECTIVES

Sligo County Council are currently at an advanced stage in the procurement process to upgrade the plant to 4,500 PE. This upgrade will result in effluent treated to a higher quality and less incidence of storm water overflows due to increased capacity for storm water holding at the plant. The treatment works is to be designed to accommodate and treat an inflow of 3 D.W.F, where 1 D.W.F is defined as being for 4,500 PE.

The upgrade should ensure that no significant pollution from the waste water works is caused.

Dangerous Substances Directive 2006/11/EC

This Directive concerns pollution caused by certain dangerous substances discharged into the aquatic environment of the EU.

Monitoring for dangerous substances in the final effluent was carried out on two occasions. An average of both results was taken and is tabulated in Table D1.

Concentrations of Table 1 parameters, Pesticides and Solvents in the final effluent are lower than the prescribed maxima for tidal waters for all parameters.

Concentrations of Table 2 parameters, Metals and Other Substances in the final effluent, are lower than the prescribed maxima for tidal waters in all cases except for Copper and Zinc as can be seen from the Table below.

In relation to the concentration of Copper in the final effluent, this is only very slightly above the level allowed in tidal waters under Irish Legislation. In relation to Zinc, the level in the final effluent is approximately twice the level allowed in tidal waters.

As the Strandhill WwTP discharges to the open sea, dilution and flushing will ensure that these emissions will not impair the environment.

For inspection purposes only.
Consent of copyright owner required for any other use.

EPA Export 26-07-2013:01:52:06

	Dangerous Substances Regulations Value NB for TIDAL WATERS	Measured Effluent Concentration	Comment	Calculated Effluent Load	Calculated Effluent Load
Parameter	mg/l	mg/l		mg/d	kg/d
Copper	0.005	0.053	POTENTIALLY HIGH	33.708	0.034
Arsenic	0.02	0.004	OK	2.544	0.003
Chromium	0.015	0.003	OK	1.908	0.002
Cyanide	0.01	<0.05			
Flouride	1.5	0.775	OK	492.900	0.493
Lead	0.005	0.005		3.180	0.003
Nickel	0.025	0.003	OK	1.908	0.002
Zinc	0.04	0.096	POTENTIALLY HIGH	61.056	0.061

The Water Framework Directive 2000/60/EC

The WFD sets a framework for comprehensive management of water resources in the European Union, within a common approach and with common objectives, principles and basic measures. It addresses inland surface waters, estuarine and coastal waters and groundwater. The fundamental objective of the Water Framework Directive aims at maintaining "high status" of waters where it exists, preventing any deterioration in the existing status of waters and achieving at least "good status" in relation to all waters by 2015. Member States will have to ensure that a co-ordinated approach is adopted for the achievement of the objectives of the WFD and for the implementation of programmes of measures for this purpose. The improvements made to the treatment works as part of the upgrade works will enable the objectives of this Directive to be met.

Currently a River Basin Management project for the Western Region is being prepared. This is currently at draft stage. The Western Region includes major lakes such as Loughs Arrow, Carrowmore, Conn, Corrib and Mask, river systems such as the Bonet, Clare, Robe, Moy and Owenmore and the related estuaries, and groundwaters and coastal waters out to a distance of one nautical mile or more. This plan is at draft stage at present.

For inspection purposes only. Consent of copyright owner required for any other use. Reproduction of copyright material for another use.

EPA Export 26-07-2013:01:52:06

The Birds Directive 79/409/EEC

This Directive and amending acts, aim at providing long term protection and conservation of all bird species naturally living in the wild within the European territory of the Member States. These member states must conserve, maintain or restore the biotopes and habitats of birds by creating protection zones such as SPAs. Strandhill WwTP does not discharge to an SPA.

The Groundwater Directives 80/68/EEC & 2006/118/EC

Not Applicable

The Drinking Water Directives 80/778/EEC

Not Applicable

The Urban Waste Water Treatment Directive 91/271/EEC

The upgrade works to Strandhill WwTP will ensure compliance with this Directive. The effluent standards to be adopted are as below:

Parameter	Concentration (mg/l)
BOD_5	25
Total Suspended Solids	35
COD	125
Total Ammonia	20

The Habitats Directive 92/43/EEC

The main aim of the EC Habitats Directive is to promote the maintenance of biodiversity by requiring Member States to take measures to maintain or restore natural habitats and wild species at a favourable conservation status, introducing robust protection for those habitats and species of European importance. Protection zones for annexed species such as SACs were designated as part of this Directive.

Strandhill WwTP is located within Cumeen Strand/Drumcliff Bay (Sligo Bay) SAC and within the Sligo and Drumcliff Bay NHA. Strandhill WwTP discharges to the

EPA Export 26-07-2013:01:52:06

sea at Kilnaspug point, which is located outside the SAC and NHA. The upgrade to the plant will ensure that effluent is treated to a high quality ensuring the integrity of the SAC and NHA is maintained.

The Environmental Liabilities Directive 2004/35/EC

Regard to the EPA Guidance on Environmental Liability Risk Assessment, Residuals Management Plans and Financial Provision was made during completion of this application. The upgrade works will serve to enhance compliance with this Directive.

The Bathing Water Directive 76/160/EEC

This Directive concerns the quality of bathing water meaning all running or still fresh waters and sea water in which members of the public bathe. Adherence to the effluent standards will ensure that this Directive is not contravened.

Shellfish Waters Directive (79/923/EEC)

The aim of the EC Shellfish Waters Directive is to protect or improve shellfish waters in order to support shellfish life and growth, therefore contributing to the high quality of shellfish products directly edible by man. It sets physical, chemical and microbiological water quality requirements that designated shellfish waters must either comply with ('mandatory' standards) or endeavour to meet ('guideline' standards). Adherence to the effluent standards will ensure that this Directive is not contravened.

There are a number of designated Shellfish Waters surrounding Ireland. Waters in proximity to Strandhill are not designated as such.

EPA Export 26-07-2013:01:52:06

ATTACHMENT G2 – NOT APPLICABLE
COMPLIANCE WITH WATER QUALITY STANDARDS FOR PHOSPHORUS REGULATIONS

For inspection purposes only.
Consent of copyright owner required for any other use.

EPA Export 26-07-2013:01:52:06

ATTACHMENT G3
IMPACT MITIGATION

Advanced stage procurement 4500 PE

Sligo County Council are currently at an advanced stage in the procurement process to upgrade the plant to 4,500 PE. This upgrade will result in effluent treated to a higher quality and less incidence of storm water overflows due to increased capacity for storm water holding at the plant. The treatment works is to be designed to accommodate and treat an inflow of 3 D.W.F, where 1 D.W.F is defined as being for 4,500 PE.

The Strandhill local area plan 2003 reports that the planned expansion of the scheme is a serviced land initiative scheme, where a local contribution of 60% is required. A copy of the Sligo Water Services Investment Programme 2007-2009 is included in Attachment B10.

For inspection purposes only.
Consent of copyright owner required for any other use.

EPA Export 26-07-2013:01:52:06

EPA Export 26-07-2013:01:52:06

ATTACHMENT G4 – NOT APPLICABLE
STORM WATER OVERFLOW

For inspection purposes only.
Consent of copyright owner required for any other use.

EPA Export 26-07-2013:01:52:06

ATTACHMENT No: A.1
NON TECHNICAL SUMMARY

For inspection purposes only.
Consent of copyright owner required for any other use.

EPA Export 26-07-2013:01:52:02

ATTACHMENT No: A.1
NON TECHNICAL SUMMARY

1.0 The waste water works and the activities carried out

Strandhill is a small seaside resort, located on the foothills of Knocknarea Mountain, approximately 8km west of Sligo City. Strandhill is rapidly developing as a dormitory settlement for Sligo and has been designated as a Key Satellite Village. The present population equivalent of the town is approximately 1,887 p.e.

The town is served by approximately 7,000m of foul sewers which drain to the WwTP located adjacent to the airport. Three pumping stations in Strandhill, namely; Sligo Road PS, West End PS and the Airport PS, serving individual subcatchments, discharge to the foul sewer in Strandhill. The town is also served by a storm sewer network.

For inspection purposes only.
Consent of copyright owner required for any other use.

The town is currently served by a 1,500 PE extended aeration wastewater treatment plant which was constructed in 1992. The plant has been maintained and operated since this date by Sligo County Council. The existing wastewater treatment plant consists of an inlet chamber with coarse screen, a measuring flume, a storm overflow chamber, an oxidation ditch, a clarifier, a sludge return sump, sludge drying beds and a control building. The plant discharges to the sea at Killaspug via an outfall pipe.

Sligo County Council are currently at an advanced stage in the procurement process to upgrade the plant to a capacity of 337.5kg/d BOD. Inlet Works, 2 no. Aeration Tanks, Clarifiers, Sludge Holding Tank, Storm Water Holding Tank and Associated Pipework and Fittings and Site Works are to be included as part of the DBO Contract.

The basic design parameters for the new wastewater treatment plant are summarised as follows:

EPA Export 26-07-2013:01:52:02

Parameter	Load
Population	4,500
Dry Weather flow (l/sec)	11.7
Peak flow to plant	95
Peak Flow to Treatment (l/sec)	35.2
Outfall Capacity [1] (l/sec)	55
Storm Tank Capacity (m^3)	253
Average $B.O.D._5$ (kg/day)	337.5

To allow for seasonal variation in load, the design BOD level is taken at 75g/person.day for Strandhill.

The upgrade will result in effluent treated to a higher quality and less incidence of storm water overflows due to increased capacity for storm water holding at the plant. The treatment works is to be designed to accommodate and treat an inflow of 3 D.W.F, where 1 D.W.F is defined as being for 4,500 PE.

A temporary package plant with a design capacity of 1,200 PE is also currently on site at Strandhill WwTP, giving a current combined treatment capacity of 2,700PE. This is not under the control of Sligo County Council and is a temporary installation, it will not be given further consideration in this application.

2.0 The sources of emissions from the waste water works

Primary Discharge

The primary discharge from the works is to the sea, and is located Killaspug Point. Discharge is through a 300mm outfall.

The effluent standards for the WwTP are:

Parameter	Concentration (mg/l)
BOD_5	25
Total Suspended Solids	35
COD	125
Total Ammonia	20

EPA Export 26-07-2013:01:52:03

The foreshore license for Strandhill, issued on the 30th of June 2003, includes the following conditions:

The effluent must conform to 25mg/l BOD and 35mg/l Suspended Solids.

The treatment works must be designed to have an effluent ammonia concentration of no more than 20mg/l.

Storm Water Overflow

The upgrade will ensure that storm water holding is provided for at the plant, minimising the risk of storm water overflows.

Flows of up to 35.2 l/s (3DWF) shall be transferred to the wastewater treatment plant from the sewer network for full treatment.

Flows in excess of the plant peak design flow to full treatment shall overflow to the stormwater tank which has a capacity of $253m^3$. Overflows from the storm tanks shall ensure that no solid greater than 6 mm in size in any direction shall be discharged to the receiving waters. The overflows shall be fitted with non-return valves to ensure there is no return of water during high water conditions.

Emergency Overflow

There is one possibility for emergency overflow in the town at Sligo Road pumping station. Discharge is to an unnamed land drain. At present, overflows from this pump station occur very rarely in the case of pump failure. Under the DBO contract, a generator will be provided at the pumping stations, to facilitate continuous operation in the event of a power failure as well as a dial out alarm system.

EPA Export 26-07-2013:01:52:03

3.0 The nature and quantities of emissions from the waste water works (into the receiving aqueous environment as well as identification of significant effects of the emissions on the environment)

The treatment works is to be designed to accommodate and treat an inflow of 3 D.W.F, where 1 D.W.F is defined as being for 4,500 PE (11.7l/s).

A flow and load survey carried out on the existing plant in June 2008 gives the following results. The flow and load survey report is included in Appendix D.1.

Influent				
Date	Cert No.	Daily Flow (m^3)	COD Load (kg)	BOD Load (kg)
23-24.06.08	14507	263.36	161.44	69.00
24-25.06.08	14518	354.38	258.34	83.63
Effluent				
Date	Cert No.	Daily Flow (m^3)	COD Load (kg)	BOD Load (kg)
23-24.06.08	14508	297.92	49.16	24.13
24-25.06.08	14519	391.38	53.23	16.44

Grab sampling of the final effluent is carried out every two months by Sligo County Council. An average of the results taken by Sligo County Council between April 2007 and April 2008 is shown below:

pH	7.25
Electrical Conductivity(@25oC)	976.6
Suspended Solids (mg/l)	100.8
Biochemical Oxygen Demand (mg/l)	100.34
Chemical Oxygen Demand (mg/l)	285
Nitrite (as N) (mg/l)	0.09
Nitrate (as N) (mg/l)	14.67
Orthophosphate (as P) (mg/l)	2.27

EPA Export 26-07-2013:01:52:03

The Design Parameters for new plant are:

Dry Weather Flow	11.5l/s
Peak flow to treatment	35.2l/s
Outfall capacity	55l/s
Storm Tank Capacity	253m^3
Average BOD	337.5kg/d
Total Phosphorous	8.1kg/d
Total Nitrogen	49.5kg/d

4.0 Identification of significant effects of the emissions on the environment

Strandhill WwTP is located within Cumeen Strand/Drumcliff Bay (Sligo Bay) SAC and within the Sligo and Drumcliff Bay NHA. Strandhill WwTP discharges to the sea at Kilnaspug point, which is located outside the SAC and NHA. The upgrade to the plant will ensure that effluent is treated to a high quality ensuring the integrity of the SAC and NHA is maintained.

5.0 The proposed technology and other techniques for preventing or reducing emissions/pollution from the waste water works

The plant is to be upgraded to have a new design capacity of 4,500 PE. Part 8 planning was granted in September 2007 and provides for Inlet Works, 2 no. Aeration Tanks, Clarifier, Sludge Holding Tank, Associated Pipework and Fittings and Site Works. This upgrade will result in effluent treated to a higher quality and less incidence of storm water overflows due to increased capacity for storm water holding at the plant. The treatment works is to be designed to accommodate and treat an inflow of 3 D.W.F, where 1 D.W.F is defined as being for 4,500 PE.

The WwTP at Strandhill is to be procured and bundled under a DBO Contract with an Operations and Maintenance period of 20 years. Tenders have been completed and the contract is underway.

EPA Export 26-07-2013:01:52:03

As part of the contract the pumping stations are also to be upgraded to include the following:

- High level alarm
- Pump malfunction alarm
- Upgrade of all mechanical and electrical facilities to ensure compliance with the latest Electrical and Health and Safety standards.
- Lockable manhole covers for all manholes within the boundary of the pump station site
- Passive odour control
- Flow measurement on rising main (with instantaneous and totalised flow readings sent to SCADA system)
- Washpoint (Hose and Reel)
- Storm storage tank at the West End Pumping Station

The outlying pumping stations shall be provided with standby generators with automatic starting in case of power failure. The pumping stations shall also have dial-out alarm systems to ensure a callout in case of pump failure and/or high level in the pump sumps or storm tanks.

1) Sligo Road Pumping Station
   - Minimum pumping capability of 5 l/ s
   - Storm overflow screens
   - Storm overflow alarm
   - Storm overflow volumetic and time measurement

2) The Airport Pumping Station
   - Minimum pumping capability of 1 l/ s

3) West End Pumping Station
   - Minimum pumping capability of 5 l/ s

For inspection purposes only. Consent of copyright owner required for any other

EPA Export 26-07-2013:01:52:03

7.0 Other

The WwTP is currently manned on a part time basis, with the operator carrying out daily tasks as required. The operator also has responsibility for the pumping stations.

Under DBO contract, the DBO contractor will be responsible for the WwTP and the pump stations.

The proposed upgraded WWTP is to be located on the site of the existing plant, to the west of the town, and will continue to discharge treated effluent via a 300mm outfall to the sea.

For inspection purposes only. Consent of copyright owner required for any other use.

EPA Export 26-07-2013:01:52:03

6.0 Measures planned to monitor emissions into the environment

Currently, a grab sample of the final effluent is taken for analysis on a two monthly basis by Sligo County Council.

As part of the proposed upgrade works of the existing treatment plant, the following on-line continuous monitoring equipment shall be provided and the measurements recorded: (In the case of flow monitoring, the total flows shall also be recorded)

(i) Flow measurement for influent, flow to full treatment, sludge return storm overflow, storm return and final effluent

(ii) Dissolved oxygen and suspended solids measurement shall be provided for each biological treatment unit.

(iii) Continuous electronic level measurement in all pump sumps, the stormwater tank and in the sludge holding tanks.

In addition, fixed refrigerated automatic flow proportional composite samplers shall be provided for the influent and effluent.

All data collected shall be provided to the Employer via a SCADA system. All data shall be updated on a regular and timely basis within 24 hours of analysis.

For inspection purposes only. Consent of copyright owner required for any other use.

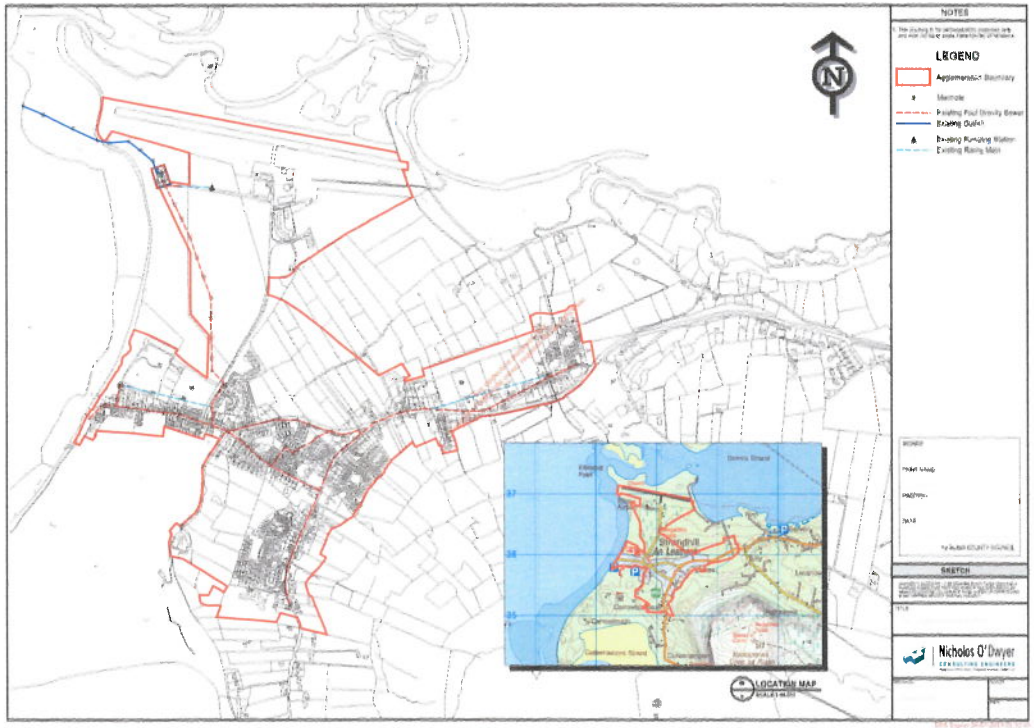
EPA Export 26-07-2013:01:52:03

ATTACHMENT No: B.1
BOUNDARY OF AGGLOMERATION

For inspection purposes only. Consent of copyright owner required for any other use.

EPA Export 26-07-2013:01:52:03

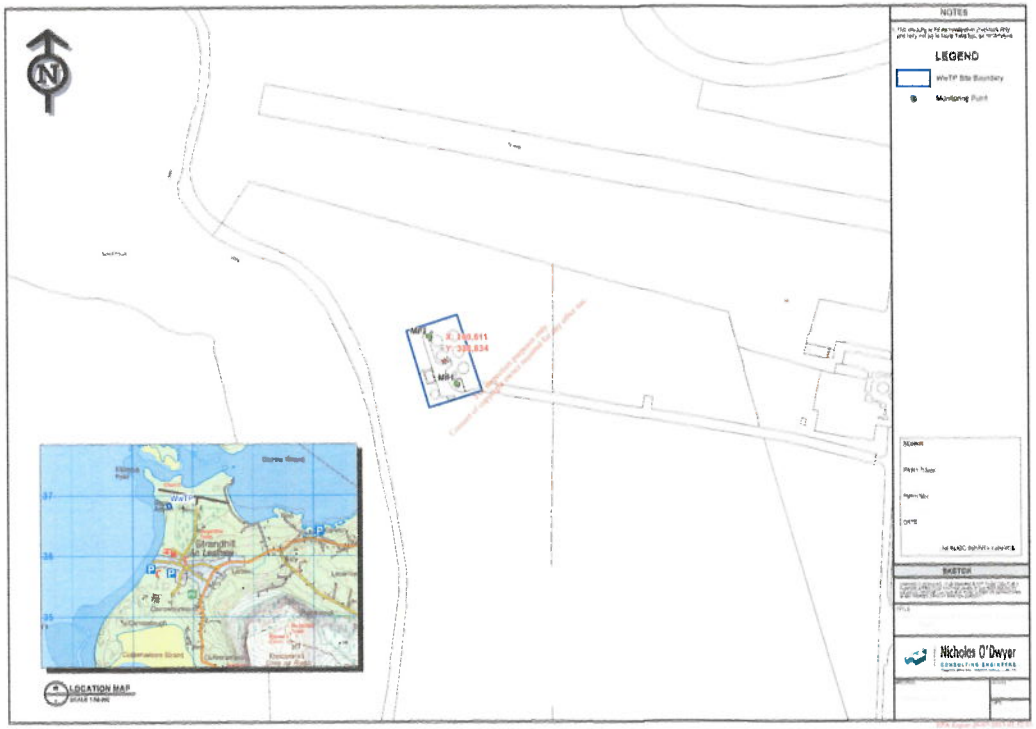
ATTACHMENT No: B.2
LOCATION OF WwTP



For inspection purposes only.
Consent of copyright owner required for any other use.

EPA Export 26-07-2013:01:52:03

ATTACHMENT No: B.3
LOCATION OF PRIMARY DISCHARGE POINT

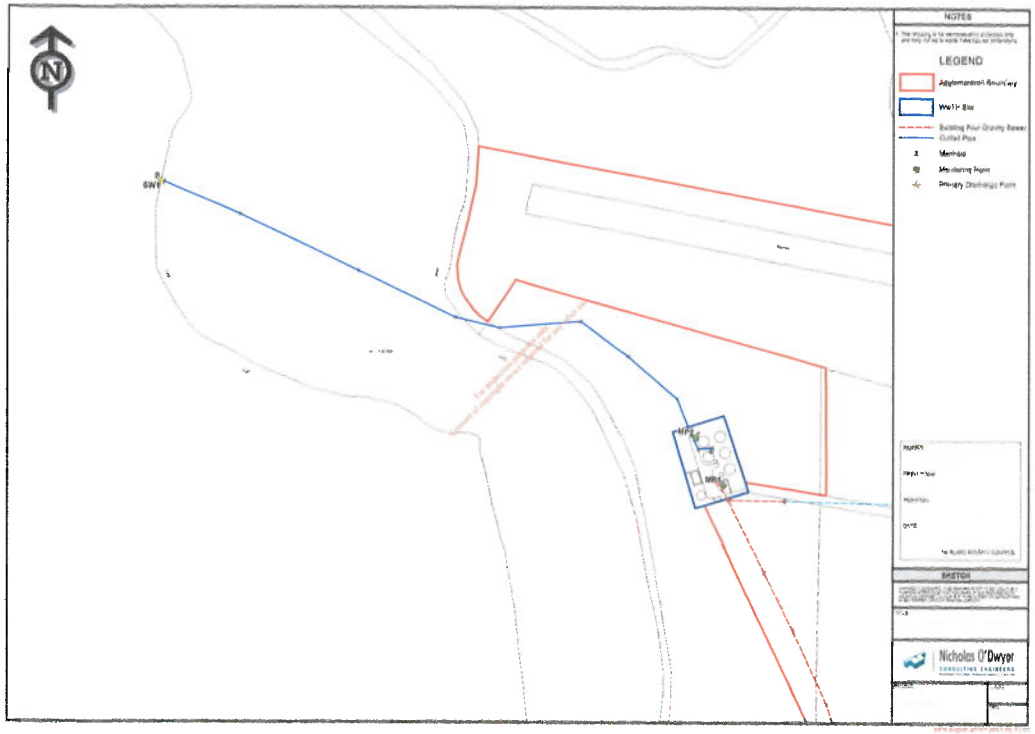


For inspection purposes only.
Consent of copyright owner required for any other use.

EPA Export 26-07-2013:01:52:03

Smell reported

ATTACHMENT No: B.4 – NOT APPLICABLE
LOCATION OF SECONDARY DISCHARGE POINT



For inspection purposes only.
Consent of copyright owner required for any other use.

EPA Export 26-07-2013:01:52:03

ATTACHMENT No: B.5 – NOT APPLICABLE
LOCATION OF STORM WATER OVERFLOWS

For inspection purposes only.
Consent of copyright owner required for any other use.

EPA Export 26-07-2013:01:52:03

ATTACHMENT No: B.6
PLANNING PERMISSION

For inspection purposes only.
Consent of copyright owner required for any other use.

EPA Export 26-07-2013:01:52:03

12

SLIGO COUNTY COUNCIL

RESOLUTION

Time received: _____

PROPOSED BY: Councillor P. Mc Loughlin

SECONDED BY: Councillor D. Bree

AND RESOLVED:

Strandhill Sewerage Scheme.

To approve in accordance with Part 8 of the Local Government (Planning and Development) Regulations, 2001 (as amended), the proposed improvement works to the above sewerage works at Killaspugbrone, Strandhill, Co. Sligo.

At this meeting of the Council held this 3rd day of September 2007 the above Resolution was AGREED ~~CARRIED~~ ~~LOST~~

SIGNATURE OF CATHAOIRLEACH: Seamus Kilgannon.

For inspection purposes only. Consent of copyright owner required for any other use.

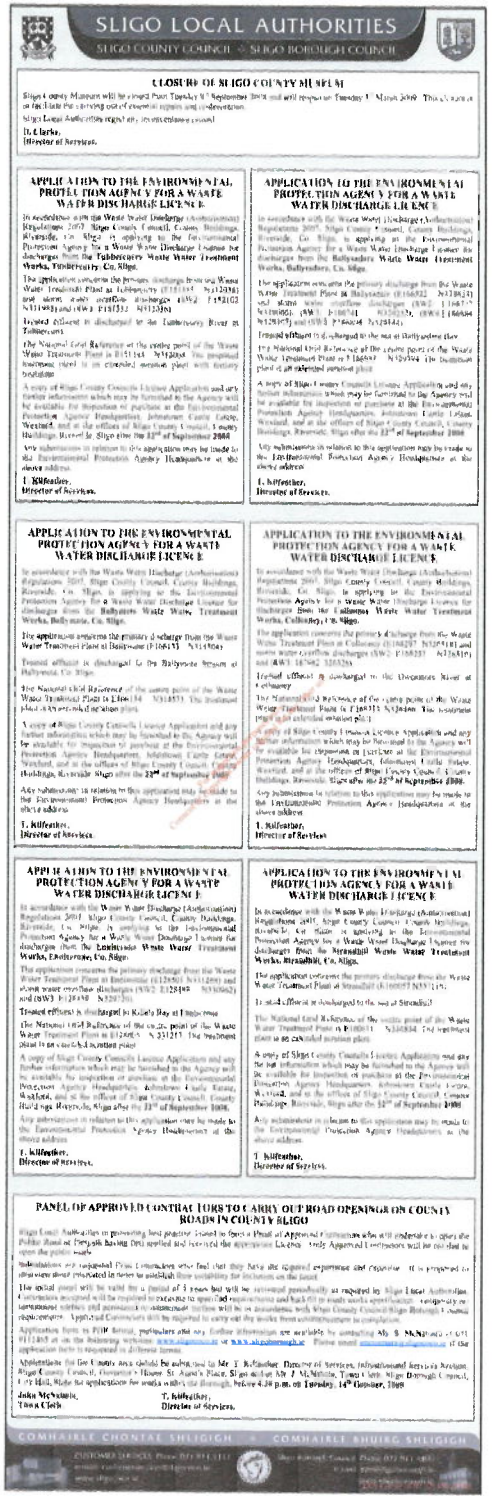
ATTACHMENT No: B.7 - NOT APPLICABLE
DISCHARGES LOCATED WITHIN SFADCo AREA

For inspection purposes only. Consent of copyright owner required for any other use.

EPA Export 26-07-2013:01:52:03

EPA Export 26-07-2013:01:52:03

ATTACHMENT No: B.8
NOTICE OF APPLICATION



SLIGO LOCAL AUTHORITIES

SLIGO COUNTY COUNCIL ~ SLIGO BOROUGH COUNCIL

CLOSURE OF SLIGO COUNTY MUSEUM

Sligo County Museum will be closed from Tuesday 1st September 2009 and will reopen on Tuesday 1st March 2010. This is done to facilitate the carrying out of essential repairs and redecoration.

Sligo Local Authorities regret any inconvenience caused.

D. Clarke,
Director of Services.

APPLICATION TO THE ENVIRONMENTAL PROTECTION AGENCY FOR A WASTE WATER DISCHARGE LICENCE

In accordance with the Waste Water Discharge (Authorisation) Regulations 2007, Sligo County Council, County Buildings, Riverside, Co. Sligo, is applying to the Environmental Protection Agency for a Waste Water Discharge Licence for discharges from the Tubbercurry Waste Water Treatment Works, Tubbercurry, Co. Sligo.

The application concerns the primary discharge from the Waste Water Treatment Plant at Tubbercurry (E168187 N312016) and storm water overflow discharges (SW1 E168202 N311993) and (SW2 E168232 N312036).

Treated effluent is discharged to the Tubbercurry River at Tubbercurry.

The National Grid Reference of the centre point of the Waste Water Treatment Plant is E168164 N312054. The proposed treatment plant is an extended aeration plant with tertiary treatment.

A copy of Sligo County Councils Licence Application and any further information which may be furnished to the Agency will be available for inspection or purchase at the Environmental Protection Agency Headquarters, Johnstown Castle Estate, Wexford, and at the offices of Sligo County Council, County Buildings, Riverside, Sligo after the 22nd of September 2009.

Any submissions in relation to this application may be made to the Environmental Protection Agency Headquarters at the above address.

T. Kilfeather,
Director of Services.

APPLICATION TO THE ENVIRONMENTAL PROTECTION AGENCY FOR A WASTE WATER DISCHARGE LICENCE

In accordance with the Waste Water Discharge (Authorisation) Regulations 2007, Sligo County Council, County Buildings, Riverside, Co. Sligo, is applying to the Environmental Protection Agency for a Waste Water Discharge Licence for discharges from the Ballysadare Waste Water Treatment Works, Ballysadare, Co. Sligo.

The application concerns the primary discharge from the Waste Water Treatment Plant in Ballysadare (E166822 N318624) and storm water overflow discharges (SW2 E166777 N318665), (SW3 E166741 N318625), (SW4 E166644 N318697) and (SW5 E166604 N318744).

Treated effluent is discharged to the sea at Ballysadare Bay.

The National Grid Reference of the centre point of the Waste Water Treatment Plant is E166697 N318594 The treatment plant is an extended aeration plant.

A copy of Sligo County Councils Licence Application and any further information which may be furnished to the Agency will be available for inspection or purchase at the Environmental Protection Agency Headquarters, Johnstown Castle Estate, Wexford, and at the offices of Sligo County Council, County Buildings, Riverside, Sligo after the 22nd of September 2009.

Any submissions in relation to this application may be made to the Environmental Protection Agency Headquarters at the above address.

T. Kilfeather,
Director of Services.

APPLICATION TO THE ENVIRONMENTAL PROTECTION AGENCY FOR A WASTE WATER DISCHARGE LICENCE

In accordance with the Waste Water Discharge (Authorisation) Regulations 2007, Sligo County Council, County Buildings, Riverside, Co. Sligo, is applying to the Environmental Protection Agency for a Waste Water Discharge Licence for discharges from the Ballymote Waste Water Treatment Works, Ballymote, Co. Sligo.

The application concerns the primary discharge from the Waste Water Treatment Plant at Ballymote (E168173 N314804).

Treated effluent is discharged to the Ballymote Stream at Ballymote, Co. Sligo.

The National Grid Reference of the centre point of the Waste Water Treatment Plant is E168134 N314853. The treatment plant is an extended aeration plant.

A copy of Sligo County Councils Licence Application and any further information which may be furnished to the Agency will be available for inspection or purchase at the Environmental Protection Agency Headquarters, Johnstown Castle Estate, Wexford, and at the offices of Sligo County Council, County Buildings, Riverside Sligo after the 22nd of September 2009.

Any submissions in relation to this application may be made to the Environmental Protection Agency Headquarters at the above address.

T. Kilfeather,
Director of Services.

APPLICATION TO THE ENVIRONMENTAL PROTECTION AGENCY FOR A WASTE WATER DISCHARGE LICENCE

In accordance with the Waste Water Discharge (Authorisation) Regulations 2007, Sligo County Council, County Buildings, Riverside, Co. Sligo, is applying to the Environmental Protection Agency for a Waste Water Discharge Licence for discharges from the Collooney Waste Water Treatment Works, Collooney, Co. Sligo.

The application concerns the primary discharge from the Waste Water Treatment Plant at Collooney (E168297 N329181) and storm water overflow discharges (SW2 E168237 N329181) and (SW3 E168502 N329326).

Treated effluent is discharged to the Drumcliffe River at Collooney.

The National Grid Reference of the centre point of the Waste Water Treatment Plant is E168313 N329260. The treatment plant is an extended aeration plant.

A copy of Sligo County Councils Licence Application and any further information which may be furnished to the Agency will be available for inspection or purchase at the Environmental Protection Agency Headquarters, Johnstown Castle Estate, Wexford, and at the offices of Sligo County Council, County Buildings, Riverside, Sligo after the 22nd of September 2009.

Any submissions in relation to this application may be made to the Environmental Protection Agency Headquarters at the above address.

T. Kilfeather,
Director of Services.

APPLICATION TO THE ENVIRONMENTAL PROTECTION AGENCY FOR A WASTE WATER DISCHARGE LICENCE

In accordance with the Waste Water Discharge (Authorisation) Regulations 2007, Sligo County Council, County Buildings, Riverside, Co. Sligo, is applying to the Environmental Protection Agency for a Waste Water Discharge Licence for discharges from the Enniscrone Waste Water Treatment Works, Enniscrone, Co. Sligo.

The application concerns the primary discharge from the Waste Water Treatment Plant at Enniscrone (E128501 N351299) and storm water overflow discharges (SW2 E128495 N351063) and (SW3 E128498 N329720).

Treated effluent is discharged to Killala Bay at Enniscrone.

The National Grid Reference of the centre point of the Waste Water Treatment Plant is E128495 N 331217. The treatment plant is an extended aeration plant.

A copy of Sligo County Councils Licence Application and any further information which may be furnished to the Agency will be available for inspection or purchase at the Environmental Protection Agency Headquarters, Johnstown Castle Estate, Wexford, and at the offices of Sligo County Council, County Buildings, Riverside, Sligo after the 22nd of September 2009.

Any submissions in relation to this application may be made to the Environmental Protection Agency Headquarters at the above address.

T. Kilfeather,
Director of Services.

APPLICATION TO THE ENVIRONMENTAL PROTECTION AGENCY FOR A WASTE WATER DISCHARGE LICENCE

In accordance with the Waste Water Discharge (Authorisation) Regulations 2007, Sligo County Council, County Buildings, Riverside, Co. Sligo, is applying to the Environmental Protection Agency for a Waste Water Discharge Licence for discharges from the Strandhill Waste Water Treatment Works, Strandhill, Co. Sligo.

The application concerns the primary discharge from the Waste Water Treatment Plant at Strandhill (E160057 N331219).

Treated effluent is discharged to the sea at Strandhill.

The National Grid Reference of the centre point of the Waste Water Treatment Plant is E160011 N330834. The treatment plant is an extended aeration plant.

A copy of Sligo County Councils Licence Application and any further information which may be furnished to the Agency will be available for inspection or purchase at the Environmental Protection Agency Headquarters, Johnstown Castle Estate, Wexford, and at the offices of Sligo County Council, County Buildings, Riverside, Sligo after the 22nd of September 2009.

Any submissions in relation to this application may be made to the Environmental Protection Agency Headquarters at the above address.

T. Kilfeather,
Director of Services.

PANEL OF APPROVED CONTRACTORS TO CARRY OUT ROAD OPENINGS ON COUNTY ROADS IN COUNTY SLIGO

Sligo Local Authorities are promoting best practice issued to form a Panel of Approved Contractors who will undertake to carry out Public Road or Footpath Opening Duty specified and reinstate the appropriate Licence. Only Approved Contractors will be entitled to open the public roads.

Individuals and Corporate Firms Contractors who feel that they have the required experience and expertise. It is proposed to advertise about restricted in order to establish their suitability for inclusion on the panel.

The initial panel will be valid for a period of 3 years but will be reviewed periodically as required by Sligo Local Authorities. Contractors accepted will be required to execute to specified requirements and back fill to roads specifications, carry out temporary surfaces and permanent re-instatement before will be in accordance with Sligo County Council/Sligo Borough Council requirements. Approved Contractors will be required to carry out the works from advertisement to completion.

Application forms in PDF format, particulars and any further information are available by contacting Ms. B. McNamara on 071 9111855 or on the following websites www.sligococo.ie or www.sligoborough.ie. Please email bmcnamara@sligococo.ie if the application form is requested in different format.

Applications for the County Area should be submitted to Mr. T. Kilfeather, Director of Services, Infrastructural Services Section, Sligo County Council, Temperance House, St. Angela's Place, Sligo and for Mr. J. McMullin, Town Clerk, Sligo Borough Council, City Hall, Wine Street, Sligo for works within the Borough, before 4.30 p.m. on Tuesday, 14th October, 2009.

John McMullin,
Town Clerk

T. Kilfeather,
Director of Services.

COMHAIRLE CHONTAE SHLIGIGH ~ COMHAIRLE BHUIRG SHLIGIGH

For inspection purposes only.
Consent of copyright owner required for any other use.

EPA Export 26-07-2013:01:52:04

SLIGO COUNTY COUNCIL

SITE NOTICE

"APPLICATION TO THE ENVIRONMENTAL PROTECTION AGENCY FOR A WASTE WATER DISCHARGE LICENCE"

In accordance with the Waste Water Discharge (Authorisation) Regulations 2007, Sligo County Council, County Buildings, Riverside, Co. Sligo, is applying to the Environmental Protection Agency for a Waste Water Discharge Licence for discharges from the **Strandhill Waste Water Treatment Works, Strandhill, Co. Sligo.**

The application concerns the primary discharge from the Waste Water Treatment Plant at Strandhill (E160057 N337116).

Treated effluent is discharged to the sea at Strandhill.

The National Grid Reference of the centre point of the Waste Water Treatment Plant is E160611 N336834. The treatment plant is an extended aeration plant.

A copy of Sligo County Councils Licence Application and any further information which may be furnished to the Agency will be available for inspection or purchase at the Environmental Protection Agency Headquarters, Johnstown Castle Estate, Wexford, and at the offices of Sligo County Council, County Buildings, Riverside, Sligo after the 22nd of September 2008.

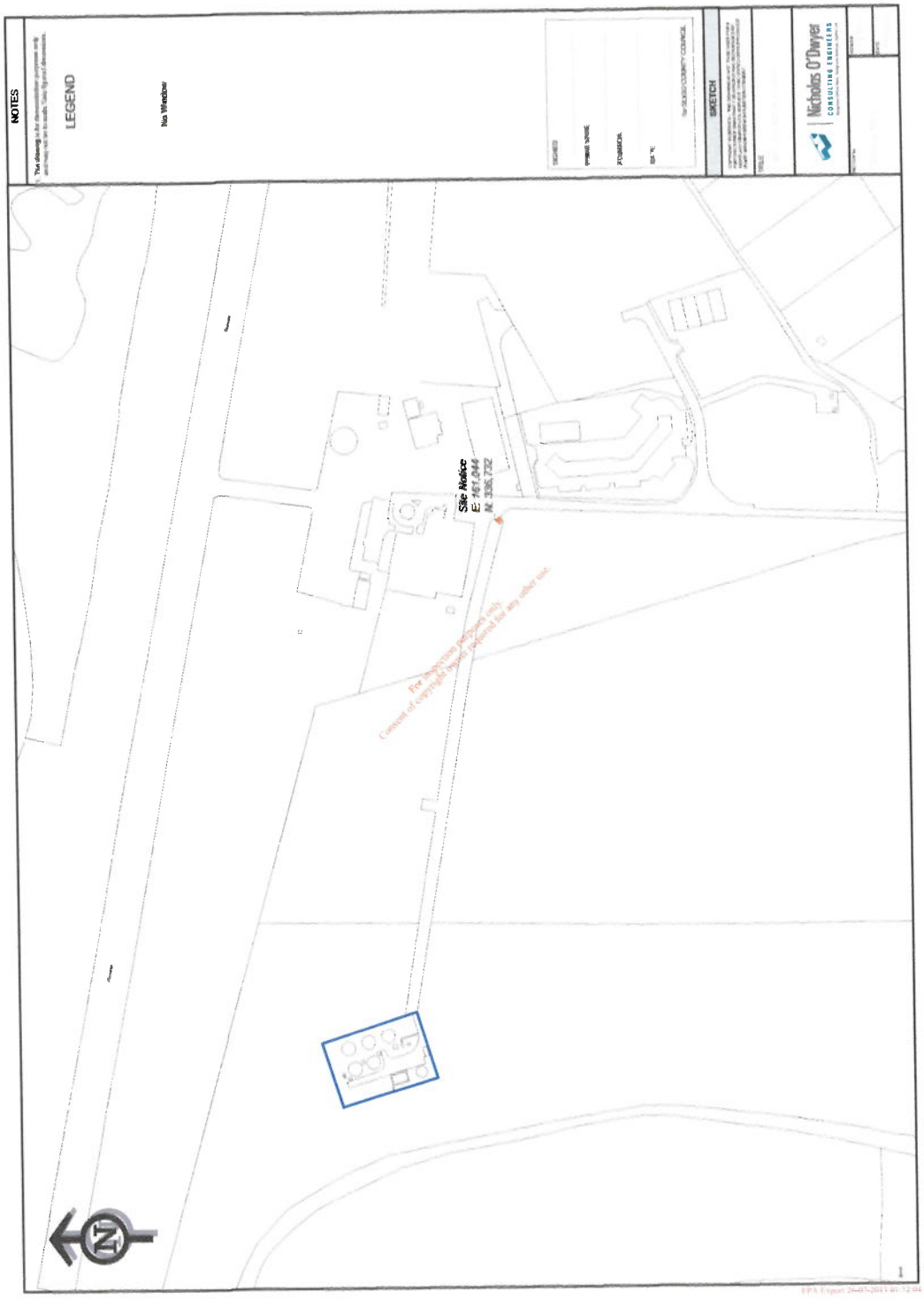
Any submissions in relation to this application may be made to the Environmental Protection Agency Headquarters at the above address.

Signed

Mr. T. Kilfeather,
Director of Infrastructural Services

Consent of copyright owner required for any other use.
For inspection purposes only.

EPA Export 26-07-2013:01:52:04



EPA Export 26-07-2013:01:52:04

Employer Alert:From 1 Ja
Who needs a WWD Li cenc
SHA Snapshots
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.

Consent of copyright owner required for any other use. For inspection purposes only.

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 capacty 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

Part 8 WWTP

2007 -

Closest Baltic Water is Rosses Pt.

In fact - "Blue Rock" is the preferred surf spot in Strandhill directly across from the WWTP beside the outfall - less than 100 m

WWTP
2013
Appropriate
Assessment

1/10

June 2007 Ref Dr. Don Cotton Appendix VII Dr Evelyn Moorkens

Sligo County Council
Comhairle Chontae Shligigh

STRANDHILL WASTEWATER TREATMENT PLANT AND STRANDHILL CARAVAN PARK PUMPING STATION UPGRADE

APPROPRIATE ASSESSMENT - STAGE 1 SCREENING



September 2013

Nicholas O'Dwyer
CONSULTING ENGINEERS

SLIGO COUNTY COUNCIL

STRANDHILL WASTEWATER TREATMENT PLANT AND STRANDHILL CARAVAN PARK PUMPING STATION UPGRADE

APPROPRIATE ASSESSMENT – STAGE 1 SCREENING

Nicholas O' Dwyer Ltd.,
Consulting Engineers,
Nutgrove Office Park,
Nutgrove Avenue,
Dublin 14.

September 2013

PROJECT NO. 20391					
Revision	**Reason for Revision**	**Prepared by**	**Reviewed by**	**Approved by**	**Issue Date**
-	First Issue	S. Keane/ S. Harris	F. Lane	N. Delaney	21/05/13
A	Incorporating Client Comments	S. Harris	F. Lane	N. Delaney	28/06/13
B	Incorporating Client Comments	S. Harris	F. Lane	N. Delaney	16/07/13
C	Incorporating Client Comments	S. Harris	F. Lane	N. Delaney	29/07/13
D	Final Draft for Client Review	C.Sheehan	F. Lane	N. Delaney	02/09/13
E	Final	C. Sheehan	F. Lane	N. Delaney	11/09/13

CONTENTS

1. INTRODUCTION 1

1.1 Appropriate Assessment (AA) 1

1.2 This Stage 1 Screening Report 2

2. APPROPRIATE ASSESSMENT SCREENING MATRIX 3

2.1 Description of Existing Scheme 3

2.1.1 Existing Infrastructure 3

2.2 Proposed Wastewater Treatment Works Upgrade 4

2.2.1 Proposed Pumping Station Upgrade and Maintenance Works 5

2.3 Proposed Effluent Standards 5

2.4 Distance from Designated Sites 6

2.5 Description of Sites Potentially Affected 9

2.5.1 Cummeen Strand/Drumcliff Bay SAC (Site Code: 000627) 9

2.5.2 Ballysadare Bay SAC (Site Code: 000622) 10

2.5.3 Cummeen Strand SPA (Site Code: 004035) 10

2.5.4 Ballysadare Bay SPA (Site Code: 004129) 11

2.6 Conservation Objectives of Designated Sites 12

2.7 Elements of the Project with Potential to give rise to Impacts on Natura 2000 Sites. 16

2.7.1 Construction 16

2.7.2 Operation 16

2.7.3 In Combination Impacts 17

2.8 Likely direct, indirect or secondary impacts of the project (either alone or in combination with other plans or projects) on the Natura 2000 site 27

2.8.1 Potential Impacts Arising from Construction 27

2.8.2 Potential Impacts Arising from Operation 30

2.8.3 Potential In Combination Impacts 31

2.9 Likely Changes to the Site as a result of the Project/Plan 32

2.10 Likely Impacts on the Natura 2000 site as a whole 34

3. CONCLUSION 34

4. FINDING OF NO SIGNIFICANT EFFECT (FONSE) REPORT 35

APPENDICES

Appendix I: Part 8 Planning for Strandhill WWTP

Appendix II: Drawings

Appendix III: Provisional Screening Exercise

Appendix IV: Correspondence

Appendix V: Site Synopses & Natura 2000 Standard Data Forms

Appendix VI: Water Management Unit Action Plan

Appendix VII: Survey and Assessment of Proposed Waste Water Treatment Works Upgrade at Strandhill County Sligo on *Vertigo angustior*

Appendix VIII: Hydrodynamic Model

1. INTRODUCTION

In accordance with the Habitats Directive 92/33/EEC (2000) any plan or project that has the potential to have a significant effect on a Natura 2000 site *i.e.* a Special Area of Conservation (SAC) or Special Protection Area (SPA) must be screened in order to determine whether an Appropriate Assessment is required. Nicholas O'Dwyer Ltd., on behalf of Sligo County Council, have prepared an Appropriate Assessment Screening Report to assess, in view of best scientific knowledge, if the proposed new sewage infrastructure required for the Strandhill Wastewater Treatment Works, including the Strandhill Caravan Park Pumping Station upgrade, will individually or in combination with other plans or projects, be likely to have a significant effect on any Natura 2000 site.

The proposed Strandhill Wastewater Treatment Works (WwTW) upgrade is part of the Tubbercurry, Grange and Strandhill Wastewater Treatment Works Design Build Operate (DBO) Scheme. This Scheme comprises the provision, operation and maintenance of upgraded wastewater treatment facilities and pumping stations for the towns of Tubbercurry, Grange and Strandhill.

Part 8 planning for the WwTP upgrade was obtained in September 2007 (see **Appendix I**). Planning for the Strandhill Caravan Park Pumping Station upgrade is currently being sought through the Part 8 planning process.

1.1 Appropriate Assessment (AA)

An Appropriate Assessment is an assessment of the potential adverse or negative effects of a plan or project, in combination with other plans or projects, on a European site. An Appropriate Assessment must be carried out before any decision is made to allow the plan or project to proceed. The obligation to undertake Appropriate Assessment derives from both Article 6(3) and 6(4) of the Habitats Directive. The European Union has provided guidance as to how to produce a Habitats Directive Assessment and identifies four main stages in the process as follows:

Stage One: Screening

The process identifies the likely impacts upon a Natura 2000 site of a project or plan, either alone or in combination with other projects or plans, and considers whether these impacts are likely to be significant.

Stage Two: Appropriate Assessment

The consideration of the impact on the integrity of the Natura 2000 site of the project or plan, either alone or in combination with other projects or plans, with respect to the site's structure and function and its conservation objectives. Additionally, where there are

deemed to be adverse impacts, an assessment of the potential mitigation of those impacts is considered.

Stage Three: Assessment of Alternative Solutions

This stage of the process examines alternative ways of achieving the objectives of the project or plan that avoid adverse impacts on the integrity of the Natura 2000 site(s).

Stage Four: Assessment where no Alternative Solutions Exist and where Adverse Impacts Remain

An assessment of compensatory measures, where in the light of an assessment of imperative reasons of overriding public interest, it is deemed that the project or plan should proceed.

The Habitats Directive promotes a hierarchy of avoidance, mitigation and compensatory measures. First, the project should aim to avoid any negative impacts on European sites by identifying possible impacts early in the planning stage, and designing the project in order to avoid such impacts. Second, mitigation measures should be applied, if necessary, during the Appropriate Assessment process to the point where no adverse impacts on the site(s) remain. If the project 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 project 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 effects.

1.2 This Stage 1 Screening Report

This document brings together all of the information necessary to make determination as to whether there is likely to be significant impacts arising from the proposed works on any Natura 2000 sites and represents the first stage of the Appropriate Assessment process, **Stage 1 Screening.**

This Stage 1 Screening Report has been prepared in accordance with the guidelines of the European Commission; Managing Natura 2000 Sites: the provisions of Article 6 of the Habitats Directive 92/43/EEC (2000), Assessment of the plans and projects significantly affecting Natura 2000 sites (2000) and the National Parks and Wildlife Service Guidance for Planning Authorities[1].

[1] Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities.

2. APPROPRIATE ASSESSMENT SCREENING MATRIX

2.1 Description of Existing Scheme

Strandhill is a coastal village situated approximately 8 km west of Sligo town. The village is served by approximately 7,000m of foul sewers which drain into the WwTW located adjacent to the airport. There are three pumping stations (PS) in Strandhill *i.e.* the Sligo Road (Bridge) PS, Caravan Park (West End) PS and the Airport PS, serving individual sub-catchments, which discharge to the foul sewer network in Strandhill. The town is also served by a storm sewer network (see **Drawing No. 20391-AA-03** of **Appendix II**).

The town is currently served by a 1,500 PE extended aeration WwTW which was constructed in 1992. The current plant is overloaded and not providing full secondary treatment of the influent wastewater. The plant discharges to the sea at Killaspug via an outfall pipe. The primary discharge (pSW1) from the existing WwTW is located outside but near to the Cummeen Strand/Drumcliff Bay SAC/SPA boundary (see **Figure 2.1** and **Figure 2.2**).

It is an objective in the Sligo County Development Plan 2011-2017 to:

SO-W-2 *Carry out measures to address deficiencies in existing water and wastewater infrastructure, so as to ensure compliance with regulatory requirements and the objectives of the Water Framework Directive.*

The proposed upgrade is required to ensure that the requirements of the Surface Water Regulations S.I. No. 272 of 2009 and the Urban Wastewater Treatment Regulations S.I. No. 254 of 2001 are met and to ultimately ensure compliance with the requirements and the objectives of the Water Framework Directive.

2.1.1 Existing Infrastructure

Details of the existing WwTW infrastructure are briefly outlined below:

Inlet Chamber with Manual Coarse Screen

Removes large objects, typically non-biodegradable materials.

Storm Overflow Chamber

Limits the flow of effluents to the sewer and WwTW and controls the polluting load during a possible storm event.

Oxidation Ditch

Modified activated sludge process which removes biodegradable substances and renders the wastewater more environmentally friendly.

Clarifier

Settles out particles and removes impurities form the wastewater after the oxidation ditch treatment.

Sludge Drying Beds and Sludge Return Sump

The drying beds allow for sludge drying. Liquids drained from the beds are returned to the WwTW for further treatment.

2.2 Proposed Wastewater Treatment Works Upgrade

The objective of this Scheme is to provide improved wastewater infrastructure in the town. This will improve the water quality of the local environment and provide safe and efficient treatment of wastewater generated in the town. The new facility at Strandhill will be procured under a design/build/operate (DBO) method of procurement. This form of procurement will allow the Contractor to propose any design which will treat the wastewater to the required performance standards. The works shall be designed to treat wastewater from Strandhill to a PE equivalent of 3,000.

The proposed works are shown in **Drawing No. 20391-AA-01** of **Appendix II** and consists of the following:

- Administration building
- Preliminary Treatment Units (consisting of screening and grit removal facilities)
- Secondary Treatment Units (for the removal of BOD and Suspended Solids)
- UV Treatment
- Storm Water Holding Tank (to store excess flows for treatment)
- Sludge Holding Tank (to store waste products from the treatment process)

The exact size and position of the units, and the exact process will be decided by the Contractor at the design stage, however, the Contractor will be obliged to stay within the site boundary and its height restrictions and comply with the requirements of Part 8 Planning.

In order to supply an equal amount of porous sand and subsoil to that which is present within the WWTP site, it will be a condition of Contract that all excavated material will be stockpiled within the compound, with care being taken to keep the sand and soil components separate, clean and covered during the period of construction.

When the new works area is operational, the old unused infrastructure will be carefully removed, and the stockpiled sand and soil carefully placed in the cleared area, with the same soil and sand horizon profile as that which was removed for the construction.

Due to the sensitivity of the surrounding environs it will be a condition of Contract that no additional external fill should be allowed on site.

Any design of the new WwTP will be no bigger in size or deeper than the existing plant and the Contractor will ensure the design, construction and operation of the new system is done in full knowledge of the sensitivity of the surrounding SAC.

2.2.1 Proposed Pumping Station Upgrade and Maintenance Works

As part of the Scheme, the Bridge and Airport Pumping Stations will require maintenance works within their site boundaries (*e.g.* pump replacement, electrical system upgrade). Due to the nature of these works no impacts are predicted on Natura 2000 sites.

The Caravan Park (West End) PS, located along the coast west of Strandhill village, along with general maintenance works, will require the addition of a new storm tank with a capacity of 20 m^3 to provide storage for peak flows, a Control Kiosk and a mechanical upgrade (see **Drawing No. 20391-AA-04** of **Appendix II**).

The Caravan Park (West End) PS upgrade works is located outside of any SAC or SPA but is located less than 1.5 Km from Cummeen Strand/Drumcliff Bay SAC, Ballysadare Bay SPA/SAC and Cummeen Strand SPA. The details of the above Natura 2000 sites are discussed in Section 2.4 of this report. The location of the Caravan Park (West End) PS and the Bridge PS and Airport PS can be seen in **Drawing No: 20391-AA-103** of **Appendix II**.

2.3 Proposed Effluent Standards

The existing Strandhill WwTW discharges to an outflow just below the low water mark at the northern end of Strandhill beach. When considering a coastal water body, the European Communities Environmental Objectives (Surface Waters) Regulations 2009 (S.I No. 272 of 2009) set the Environmental Quality Standard values for Dissolved Oxygen (DO) and Dissolved Inorganic Nitrogen (DIN). The waters off Strandhill are designated as '*high status*' and will therefore require a DIN (mg/l) of 34.5psu/ ≤ 0.17 mg/N/l. The median salinity measured in Sligo Bay is 34.1 PSU. The standard for DO is 35psu/95th percentile > 80% saturation as the lower limit and 35psu/95th percentile < 120% saturation as the upper limit. Waters to the North of the outfall at Strandhill in Sligo Bay have been designated as shellfish waters, therefore the requirements of the Shellfish Regulations 2006 and as detailed in the Shellfish Waters Directive (S.I. No. 55 of 2009) will also have to be taken into consideration when setting effluent standards for the Strandhill WwTP. The current effluent standards as set out in the Strandhill WwTP upgrade contract documents are presented in **Table 2.1** below.

Table 2.1 – Strandhill Effluent Standards

Parameter	Proposed Effluent Standards (mg/l)
Biological Oxygen Demand (BOD)	25
Total Suspended Solids (TSS)	35
Chemical Oxygen Demand	125
Total Ammonia	20

2.4 Distance from Designated Sites

A provisional screening exercise of Natura 2000 sites within a 20 km radius of the works was carried out and is attached in **Appendix III**. The assessment indicated that there are 8 SAC's and 7 SPA's within 20 km of the proposed sewerage treatment infrastructure.

All Natura 2000 sites were '*screened out*' except for the Cummeen Strand/Drumcliff Bay SAC (Site Code: 000627), Cummeen Strand SPA (Site Code: 004035), Ballysadare Bay SAC (Site Code: 000622) and Ballysadare SPA (Site Code: 004129).

The plant discharges to the Strandhill beach which is at a point bordering the boundary of the Cummeen Strand/Drumcliff Bay SAC, as shown in **Figure 2.1** and **Figure 2.2** overleaf. It is proposed to re-use the existing outfall for the upgraded WWTP.

The proposed WWTP is currently located partially within the Cummeen Strand/Drumcliff Bay SAC. It would appear however that there is a discrepancy with the Cummeen Strand/Drumcliff Bay SAC mapping as shown in **Figure 2.3**. This mapping discrepancy has been confirmed and clarified by the NPWS and a new map of the revised boundary is attached in **Appendix IV**. The area not mapped within the SAC as shown in **Figure 2.3** is part of the Cummeen Strand/Drumcliff Bay SAC. The exclusion area to the west of the map, as shown in **Appendix IV**, is the Strandhill WwTW.

In a recent correspondence from the NPWS in June 2013 regarding the above mapping discrepancy, the NPWS stated that "*for the purposes of carrying out assessments on potential impacts of plans and projects on the cSAC, I wish to confirm that it is acceptable to use the attached revised boundary*" (see **Appendix IV**). Therefore, this revised boundary has been used for the purposes of this assessment *i.e.* no works relating to Strandhill Wastewater Treatment Works upgrade, including the Strandhill Caravan Park Pumping Station upgrade, will be taking place within a Natura 2000 site.

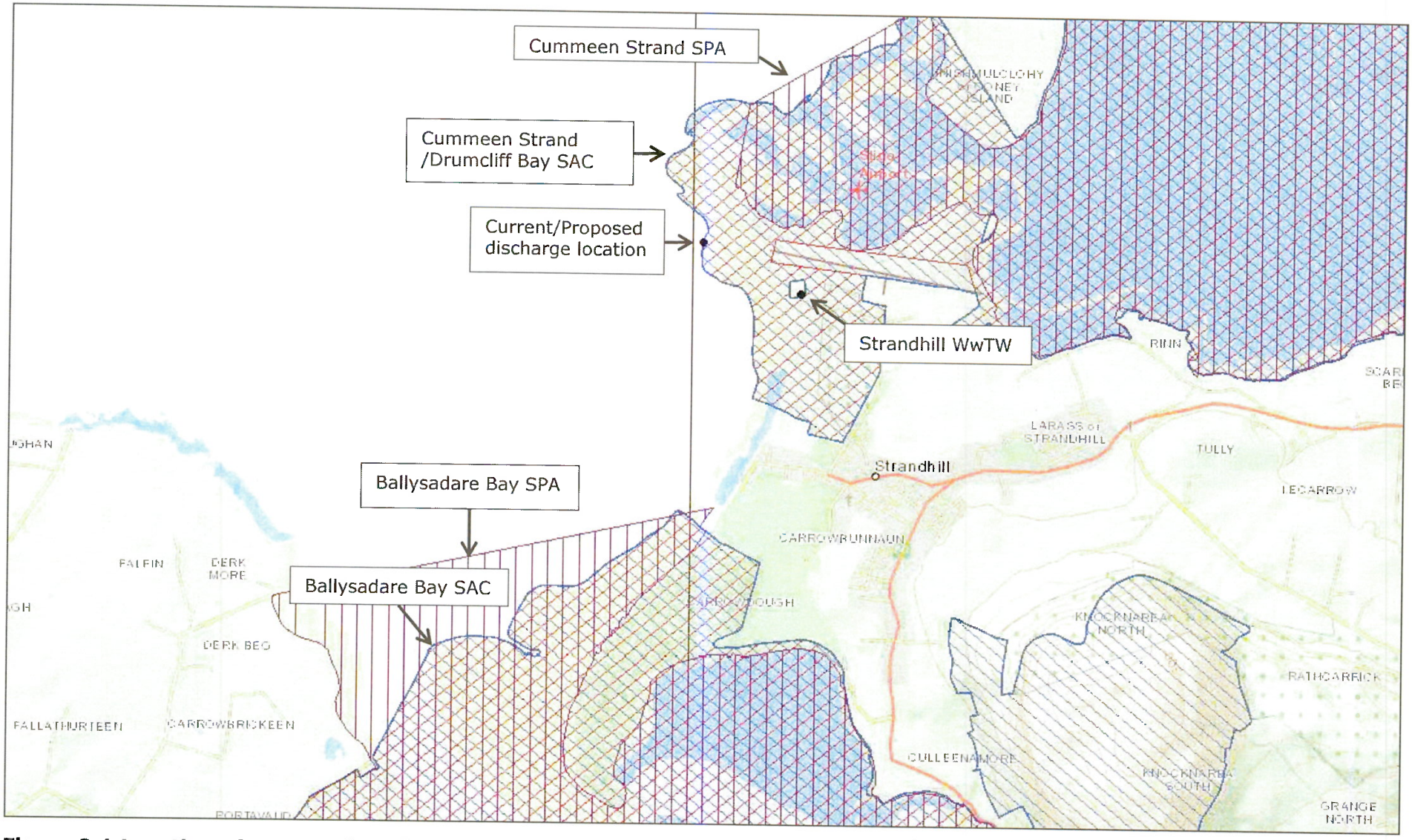


Figure 2.1 Location of proposed works WwTW upgrade at Strandhill, Sligo

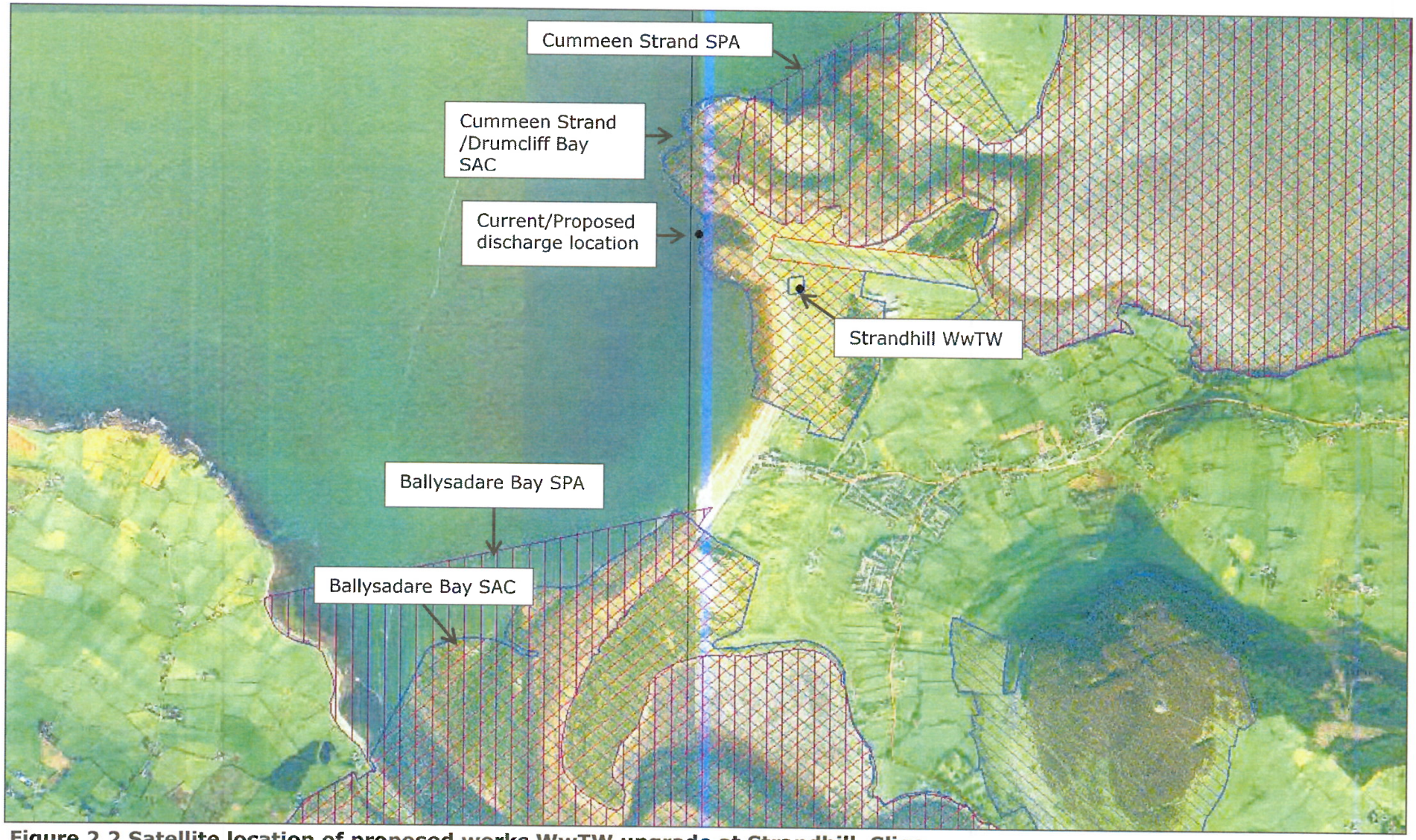


Figure 2.2 Satellite location of proposed works WwTW upgrade at Strandhill, Sligo

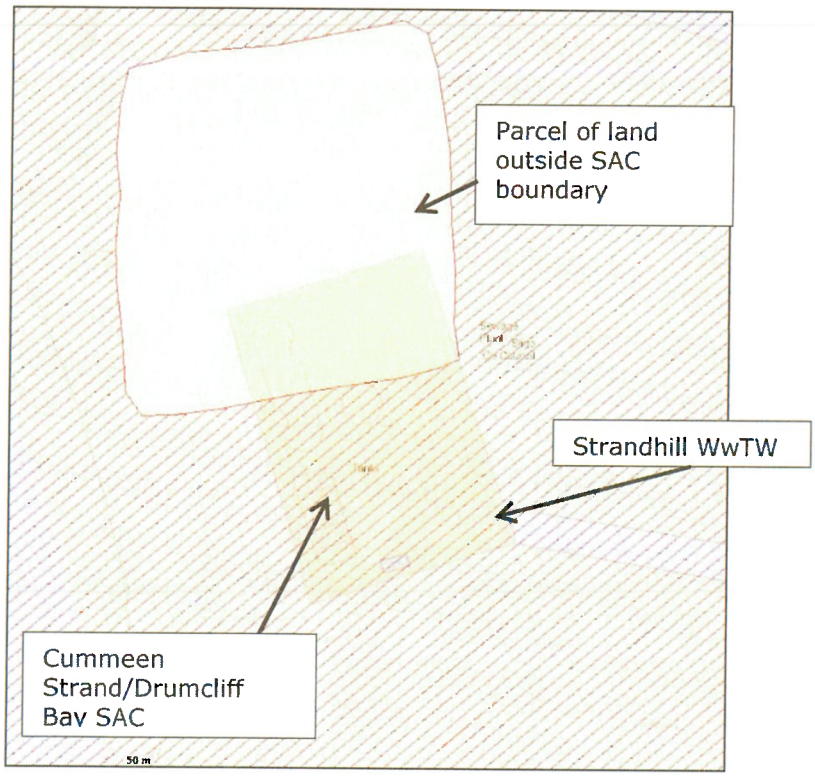


Fig 2.3 Cummeen Strand/Drumcliff Bay SAC mapping discrepancy showing WwTW within SAC boundary

2.5 Description of Sites Potentially Affected

2.5.1 Cummeen Strand/Drumcliff Bay SAC (Site Code: 000627)

Cummeen Strand/Drumcliff Bay SAC is a large coastal site which extends from Cullamore in the North-West to Killaspug in the South-West, and from Sligo town in the South-East to Drumcliff village in the North-East. Cummeen Strand/Drumcliff Bay has been designated as a candidate Special Area of Conservation (SAC) under the EU Habitats Directive. Cummeen Strand/Drumcliff Bay (Sligo Bay) is an important site of high conservation significance, which includes a wide variety of habitat types, including several listed in Annex I of the EU Habitats Directive, several species listed on Annex II of this directive, large and important populations of waterfowl and seabirds, and several rare plant species. The conservation interested of the Cummeen Strand/Drumcliff Bay SAC are presented below.

- Narrow mouthed whorl snail *(Vertigo angustior)*[1014]
- Sea lamprey (*Petromyzon marinus*) [1095]
- River lamprey (*Lampetra fluviatilis*)[1099]
- Estuaries [1130]
- Mudflats and sandflats not covered by seawater at low tide [1140]
- Common seal (*Phoca vitulina*) [1365]

- Embryonic shifting dunes [2110]
- Shifting dunes along the shoreline with *Ammophila arenaria* (white dunes) [2120]
- Fixed coastal dunes with herbaceous vegetation (grey dunes) [2130]
- *Juniperus communis* formations on heaths or calcareous grasslands [5130]
- Petrifying springs with tufa formation (*Cratoneurion*) [7220]

The NPWS site synopsis and Natura 2000 Standard Data Form for the Cummeen Strand/Drumcliff Bay SAC are included in **Appendix V.**

2.5.2 Ballysadare Bay SAC (Site Code: 000622)

Ballysadare Bay SAC extends approximately 10 km west of the town of Ballysadare, County Sligo and is the most southerly of three inlets of the larger Sligo Bay. Ballysadare Bay is of ecological value for its range of good quality coastal habitats. Actively developing dune systems are rare on the west coast and the sand dune system at Strandhill is of particular interest as a large and intact example of a habitat type which is under general threat from development. The rarity of intact dune systems is recognised in the listing of "*Fixed Dunes*" as priority habitat on Annex I of the EU Habitats Directive. The presence of two Annex II species within the site adds further importance. Furthermore, the bay supports nationally important numbers of waterfowl. The conservation interests of the Ballysadare Bay SAC are presented below.

- Narrow mouthed whorl snail *(Vertigo angustior)* [1014]
- Estuaries [1130]
- Mudflats and sandflats not covered by seawater at low tide [1140]
- Common seal *(Phoca vitulina)* [1365]
- 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]

The NPWS site synopsis and Natura 2000 Standard Data Form for the Ballysadare Bay SAC are included in **Appendix V.**

2.5.3 Cummeen Strand SPA (Site Code: 004035)

Cummeen Strand is of ornithological importance as it supports important concentrations and Nationally Important populations of a further two species, Oystercatcher and Redshank. Other species which occurred in significant numbers included Shelduck, Wigeon, Teal, Mallard, Red-breasted Merganser, Golden Plover, Lapwing, Knot, Sanderling, Dunlin, Bar-tailed Godwit, Curlew, Greenshank and Turnstone. Whooper Swans also occur, though they are not regular visitors. The presence of Golden Plover,

Bar-tailed Godwit and Whooper Swan is of particular note as these species are listed on Annex I of the EU Birds Directive.

This site is of high ornithological importance, with one species having a population of International Importance (*i.e.* Light-bellied Brent Goose) and two having populations of National Importance (*i.e.* Oystercatcher and Redshank). In addition, there are three species that are listed on Annex I of the Birds Directive (i.e. Golden Plover, Bar-tailed Godwit and Whooper Swan).

The site is also important as a component of the much larger Sligo Bay complex. The conservation interests of the Cummeen strand SPA are presented below.

- Light-bellied Brent Goose (*Branta bernicla hrota*) [A046] [wintering]
- Oystercatcher (*Haematopus ostralegus*) [A130] [wintering]
- Redshank (*Tringa totanus*) [A162] [wintering]
- Wetlands [A999]

The NPWS site synopsis and Natura 2000 Standard Data Form for the Cummeen Strand SPA are included in **Appendix V**.

2.5.4 Ballysadare Bay SPA (Site Code: 004129)

Ballysadare Bay SPA is of high ornithological importance; it supports a Light-bellied Brent Goose population of international importance as well as nationally important populations of five other species of wintering waterfowl. The presence of Bar-tailed Godwit, Golden Plover and Whooper Swan is of particular note as these species are listed on Annex I of the E.U. Birds Directive. The site also forms an important component of the larger Sligo Bay complex. The conservation interests of the Ballysadare Bay SPA are presented below.

- Light-bellied Brent Goose (*Branta bernicla hrota*) [A046] [wintering]
- Grey Plover (*Pluvialis squatarola*) [A141] [wintering]
- Dunlin (*Calidris alpina*) [A149] [wintering]
- Bar-tailed Godwit (*Limosa lapponica*) [A157] [wintering]
- Redshank (*Tringa totanus*) [A162] [wintering]
- Wetlands [A999]

The NPWS site synopsis and Natura 2000 Standard Data Form for the Ballysadare Bay SPA are included in **Appendix V**.

2.6 Conservation Objectives of Designated Sites

According to the EU Habitats Directive, favourable conservation status of a habitat is achieved when:

- Its natural range, and area it covers within that range, are stable or increasing, and
- The specific structure and functions which 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.

According to the EU Habitats Directive, favourable conservation status of a species is achieved when:

- Population dynamics data on the species concerned indicate that it is maintaining itself on a long-term basis as a viable component of its natural habitats, and
- The natural range of the species is neither being reduced nor is 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.

A site's conservation objectives are a statement of the overall nature conservation requirements for a site, expressed in terms of the favourable condition required for the qualifying features.

No site specific conservation objectives have been set for the Cummeen Strand/Drumcliff Bay SAC, Cummeen Strand SPA, Ballysadare Bay SAC and Ballysadare SPA. Therefore, the generic conservation objectives as outlined below apply to these sites.

Objective 1: *To maintain or restore the favourable conservation condition of the Bird species listed as Special Conservation Interests.*

Objective 2: *To maintain or restore the favourable conservation condition of the Annex I habitat(s) and/or the Annex II species for which the SAC has been selected.*

Objective 3: *To establish effective liaison and co-operation with landowners, legal users and relevant authorities.*

Threats identified to the above Natura 2000 sites are presented overleaf in **Table 2.2**.

Table 2.2 Threats to Natura 2000 Site Integrity

Site Name (Site Code)	Annex I habitat	Annex II Species	Conservation Objectives	Threats to site integrity
Cummeen Strand /Drumcliff Bay SAC (000627)	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] *Juniperus communis* formations on heaths or calcareous grasslands [5130] Petrifying springs with tufa formation (*Cratoneurion*) [7220]	*Vertigo angustior* [1014] *Petromyzonmarinus* [1095] *Lampetra fluviatilis* [1099] *Phoca vitulina* [1365]	To maintain Annex I habitats and Annex II species for which the SAC has been selected at favourable conservation status. To maintain the extent of species richness and biodiversity of the entire site; and To establish effective liaison and co-operation with landowners, legal users and relevant authorities.	• Agricultural • Agricultural abandonment • Aquaculture • Bracken and scrub encroachment • Burning • Decrease in water quality/ Increased pollution • Development of marinas and ports • Direct and indirect impacts to the habitats of the bird species of conservation interests (loss of habitat) • Direct loss of habitat to development • Disturbance to marine mammals • Drainage/Changes in local hydrology including water abstraction • Dumping at sea • Erosion (natural and anthropogenic) • Illegal Dumping • improvements/Reclamation • Inappropriate land management • Introduction of alien invasive species • Overgrazing/under grazing • Quarrying/removal of sand • Recreational/amenity use • Tourism related development • Water quality/pollution

Site Name (Site Code)	Annex I habitat	Annex II Species	Conservation Objectives	Threats to site integrity
Ballysadare Bay SAC (004129)	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]	*Vertigo angustior* [1014] *Phoca vitulina* [1365]	To maintain Annex I habitats and Annex II species for which the SAC has been selected at favourable conservation status. To maintain the extent of species richness and biodiversity of the entire site; and To establish effective liaison and co-operation with landowners, legal users and relevant authorities.	• Direct and indirect impacts to the habitats of the bird species of conservation interests (loss of habitat) • Direct loss of habitat to development • Disturbance including/from recreation/amenity use • Illegal Dumping • Inappropriate land management • Introduction of alien invasive species • Water quality/pollution
Site Name (Site Code)	**Annex I habitat**	**Annex II Species**	**Conservation Objectives**	**Threats to site integrity**
Ballysadare Bay SPA (004013)	Wetlands [A999]	*Calidris alba* [A144] *Limosa lapponica* [A157]	To maintain the bird species of special conservation interest for which the SPA has been listed, at favourable conservation status.	• 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 • Introduction of alien invasive species • Illegal Dumping • Disturbance including/from recreational/amenity use • Inappropriate land management

Site Name (Site Code)	Annex I habitat	Annex II Species	Conservation Objectives	Threats to site integrity
Cummeen Strand SPA (004035)	Wetlands [A999]	*Branta bernicla hrota* [A046] *Haematopus ostralegus* [A130] *Tringa totanus*) [A162]	To maintain the bird species of special conservation interest for which the SPA has been listed, at favourable conservation status.	• 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 • Introduction of alien invasive species • Illegal Dumping • Persecution (Poisoning) • Disturbance including/from recreational/amenity use • Inappropriate land management
Site Name (Site Code)	**Annex I habitat**	**Annex II Species**	**Conservation Objectives**	**Threats to site integrity**
Ballysadare SPA (004129)	Wetlands [A999]	*Branta bernicla hrota* [A046] *Pluvialis squatarola* [A141] *Calidris alpina* [A149] *Limosa lapponica* [A157] *Tringa totanus* [A162]	To maintain the bird species of special conservation interest for which the SPA has been listed, at favourable conservation status.	• 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 • Introduction of alien invasive species • Illegal Dumping • Disturbance including/from recreational/amenity use • Inappropriate land management

APPENDIX I: PART 8 PLANNING FOR STANDHILL WWTP UPGRADE

Sligo County Council

Comhairle Chontae Shligigh

TUBBERCURRY, GRANGE AND STRANDHILL WASTEWATER TREATMENT PLANTS

STRANDHILL WASTEWATER TREATMENT PLANT

PART VIII – PUBLIC CONSULTATION PROCESS

Dr Don Gilton

June 2007

Nicholas O'Dwyer
CONSULTING ENGINEERS

SLIGO COUNTY COUNCIL

TUBBERCURRY, GRANGE AND STRANDHILL WASTEWATER TREATMENT PLANTS

STRANDHILL WASTEWATER TREATMENT PLANT

PART VIII – PUBLIC CONSULTATION PROCESS

OUTLINE DESCRIPTION OF SCHEME

Nicholas O'Dwyer Ltd.,
Consulting Engineers,
Nutgrove Office Park,
Nutgrove Avenue,
Dublin 14.

June 2007

PROJECT NO. 20391		Prepared by		Approved by		Issued by	
		Initials	Date	Initials	Date	Initials	Date
Revision	Reason for Revision	MM	05/06/07	MD	05/06/07	JP	05/06/07
A							
B							
C							
D							

CONTENTS

1. INTRODUCTION 1

2. EXISTING SYSTEM 2

2.1 Sewerage Network 2

2.2 Wastewater Treatment Works 2

3. OUTLINE DESCRIPTION OF THE WORKS 4

4. IMPACT OF THE SCHEME 5

5. DRAWINGS 7

1. INTRODUCTION

Strandhill is a small seaside resort, located on the foothills of Knocknarea Mountain, approximately 8km west of Sligo City. Strandhill is rapidly developing as a dormitory settlement for Sligo and has been designated as a Key Satellite Village. Sligo Regional Airport is located to the north of the village. The village is currently served by a 1,500 PE extended aeration treatment plant, which discharges to the sea via an outfall pipe. The plant is to be upgraded to have a new design capacity of 4,500 PE. Strandhill WWTP is located within Cumeen Strand/Drumcliff Bay (Sligo Bay) Special Area of Conservation (SAC).

The proposed Strandhill Wastewater Treatment Plant is part of the Tubbercurry, Grange and Strandhill Wastewater Treatment Plants Design, Build and Operate (DBO) Scheme. This Scheme comprises the provision, operation and maintenance of upgraded wastewater treatment facilities and pumping stations for the towns of Tubbercurry, Grange and Strandhill.

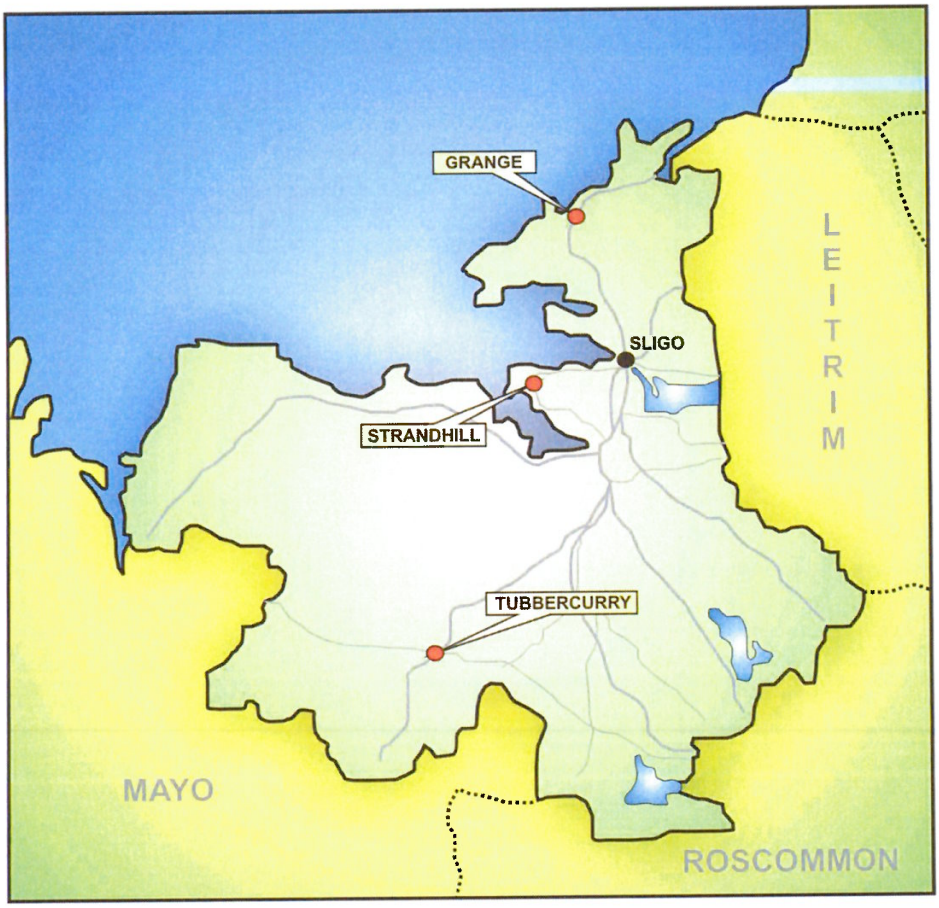


Figure 1. Map of Sligo County

2. EXISTING SYSTEM

2.1 Sewerage Network

At present, there is approximately 7,000m of foul sewerage pipeline servicing Strandhill. The majority of the network consists of separate surface water and foul sewers. Modifications of the sewerage network do not form part of this application.

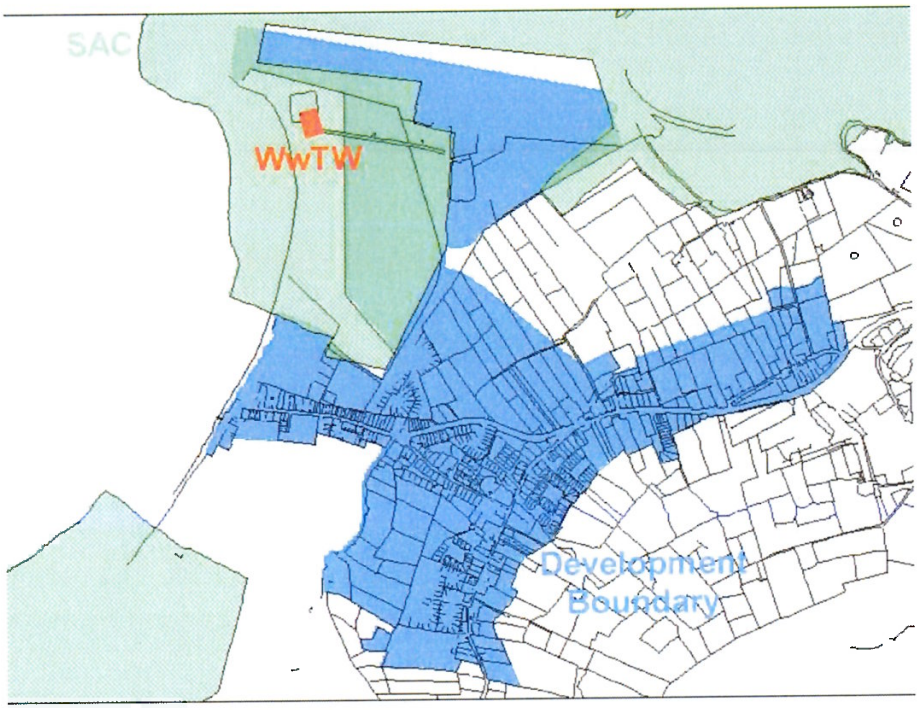


Figure 2 - Site Location

2.2 Wastewater Treatment Works

The existing treatment plant is located in a Special Area of Conservation (Site Code 000627) and is just outside the north western edge of the development boundary for Strandhill, as illustrated in Figure 2. A more detailed site location is shown on Drawing No 20391-PC-SL-03. The existing WwTW consists of manual coarse inlet screening, a biological treatment tank, a secondary settlement tank and sludge drying beds, and is shown on Drawing No 20391-PC-SL-02. A description of the treatment provided by these elements is given below:

Manual Coarse Screen

Removes large objects, typically non-biodegradable materials.

Biological Treatment Tank

This removes dissolved substances and renders the wastewater more environmentally friendly.

Secondary Settlement Tank

This separates the solids from the wastewater after the biological treatment stage.

Sludge Drying Beds

This provides removal of water from the settled sludge arising from the treatment process. After drying, the solids are removed and disposed of in accordance with the Sludge Management Plan for Sligo.

Dr Don Cotton

3. OUTLINE DESCRIPTION OF THE WORKS

The objective of the scheme is to provide improved wastewater infrastructure in the town. This will improve the water quality of the local environment and provide safe and efficient treatment of wastewater generated at the town.

The new facility at Strandhill will be procured under a design/build/operate method of procurement. This form of procurement allows the Contractor to propose any design which will treat the wastewater to the required performance specification standards. The works shall be designed to treat wastewater from Strandhill to a p.e equivalent of 4,500. An indicative layout is shown on Drawing No 20391-PC-SL-01.

The proposed works shall consist of the construction of the following:

- Administration Building
- Preliminary Treatments Units (consisting of screening and grit removal facilities)
- Secondary Treatments Units (for the removal of BOD and Suspended Solids)
- Stormwater Holding Tank (to store excess flows for treatment)
- Sludge Holding Tanks (to store waste products from the treatment processes)

The exact size and position of the units, and the exact process will be decided by the Contractor at the design stage, however, the Contractor will be obliged to stay within the site boundary and its height restrictions and comply with the requirements of Part VIII Planning. Once the new works are operational, unused parts of the existing plant will be demolished and removed from site for disposal.

An Ecological Assessment of various site extensions was carried out by Dr. Don Cotton, CREDCO, and the recommendations of this Assessment have been incorporated into this proposal.

The Contract Documents for the scheme will include height restrictions, odour and noise emission restrictions, and will oblige the Contractor to provide screening in the form of indigenous planting.

4. IMPACT OF THE SCHEME

The design population of the proposed treatment facility is 4,500 p.e.

Wastewater from Strandhill will be treated at the Strandhill Wastewater Treatment Works to the required secondary effluent standards prior to discharge to the sea. The proposed effluent standards at the Strandhill Wastewater Treatment Works are as follows:

- 25 mg/l BOD
- 35 mg/l Suspended Solids
- 20 mg/l Ammonia.

Baseline noise and odour studies are being undertaken at the proposed site to determine background noise and odour emissions. The proposed plant will be required to keep noise and odour emissions to within an acceptable range of the existing background levels. This will ensure that no public nuisance is caused by the works. The specified noise and odour limits will be included in the contract documents for the scheme, and will be monitored by both the Contractor and Sligo County Council on an ongoing basis over the contract period.

A desktop archaeological study is being undertaken to identify any potential archaeological issues. As part of this process, consultation with the Development Applications Unit of the Department of the Environment, Heritage and Local Government will be undertaken. The requirements of the DEHLG Development Applications Unit will be incorporated into the contract documents for the scheme. These requirements may include monitoring of the construction by a qualified Archaeologist.

At the treatment facility, landscaping will be carried out with suitable planting ensuring that the works merge harmoniously with the surrounding area.

All buildings on the treatment works site will be restricted to a maximum height of 6.0 metres above the existing ground level as shown on Drawing No. 20391-PC-SL-01. All tanks and other process structures shall be buried or partially buried so that no more than 6.0 metres projects above the existing ground level. The hardstanding on the site will have a bitumen macadam surface and be kerbed to form roadways and turning areas.

Sludge shall be transported by road in liquid form from the facility for dewatering at the Sligo Sludge Hub once this is operational as per the Sludge Management Plan for County Sligo.

In relation to environmental issues, the current WwTW site is located in an SAC. The impact of plant expansion has already been assed in an Environmental Assessment by Dr. Don Cotton, CREDCO, and as a result the new WwTW will be entirely within the existing WwTW boundary. All construction traffic will use the existing road access, and all plant and materials will be contained within the existing WwTW boundary to minimise environmental impacts.

5. DRAWINGS

It should be noted that the Treatment Facility layout shown on the Drawing is indicative only. This is due to the proposed Design Build Operate procurement method. However, the particular requirements outlined in Section 4 will be maintained.

Drawing No.	Description
20391-PC-SL-01	Proposed Indicative Site Layout Plan & Section
20391-PC-SL-02	Existing Site Layout Plan & Section
20391-PC-SL-03	Wastewater Treatment Works Site Location Plan

2.7 Elements of the Project with Potential to give rise to Impacts on Natura 2000 Sites.

The individual elements of the project with potential to give rise to impacts (either alone or in combination with other plans or projects) on Natura 2000 sites include the following:

2.7.1 Construction

Elements of the WwTW upgrade, including the West End (Caravan Park) PS upgrade works, which may give rise to impacts on Natura 2000 sites during the construction stage include the following:

- Discharges of sediment and substances toxic to the aquatic environment (*i.e.* fuels *etc.*) during construction works.
- Destruction of dune habitat protected by the Cummeen Strand/Drumcliff Bay SAC and Ballysadare Bay SAC during construction works.
- Disturbance of wintering birds protected by the Cummeen Strand and Ballysadare Bay SPA by noise generated during construction works.
- Destruction of dune habitat used by *Vertigo angustior* [Whorl Snail] which has recently been recorded at Killaspugbrone.
- Change in drainage of site and hydrogeological regime/flows which would impact *Vertigo angustior*.
- Killing/Injury of *Vertigo angustior* during construction works.

The Bridge and Airport Pumping Stations will require maintenance works within their site boundaries (*e.g.* pump replacement, electrical system upgrade). No construction impacts are predicted on Natura 2000 sites from this maintenance work due to the nature of the works.

2.7.2 Operation

Elements of the WwTW construction and upgrade which may give rise to impacts on the Natura 2000 sites are discharges of treated wastewater. The discharge will consist primarily of treated effluent from the WwTW but can also include screened overflow volumes in the times of storm events. The primary discharge from the WwTW will be to the sea at Killaspug via the current outfall pipe.

A possible indirect cumulative impact of the proposed Scheme would be that by controlling the man-made organic input (*i.e.* untreated and poorly treated sewage) into the receiving water environment, the nutrients available for macro-faunal production would decline, possibly reducing the biomass of organisms present. This could result in a depressed food

supply for bird species compared with the existing situation. However, a similar response to cleaner conditions would be an increase in the numbers of macro-faunal species present and this would be an important positive impact for biodiversity. A reason for this increase in diversity is that algal mats would be less frequent and associated anoxic conditions would be deeper than is currently the case. This would influence the macro-invertebrate population by allowing animals to penetrate deeper into sediments - increasing the available habitats three dimensionally. This would also allow for greater biomass and diversity and would be expected to offset any loss of biomass as a result of reduced nutrient inputs.

2.7.3 In Combination Impacts

Appropriate Assessment must consider "*In Combination Impacts*" with other plans or projects, including those being progressed by other competent authorities as defined by the Habitats Regulations and with the prevailing background conditions. The possible "*In Combination Impacts*" identified are outlined below.

Western River Basin Management Plan

In order to provide background information on the "*In Combination Impacts*", the **Western River Basin Management Plan** was examined. Eight River Basin Districts were established in Ireland arising out of the legal requirements of the Water Framework Directive (WFD). River Basin Management Plans are published for all River Basin Districts in Ireland in accordance with the requirements of the Water Framework Directive (WFD). Killaspug point (Sligo Bay) (WwTW Outfall point) forms part of the Western River Basin District.

One of the main requirements of the Water Framework Directive (WFD) is that **by 2015 all water bodies achieve "good" status**. Killaspug Point (Sligo Bay) is classified as being of "*High Status*". Although based on the WFD Risk Assessment the Bay is classified as **1a – At risk of not achieving "*Good Status*"** as a result of WwTW loading, among other factors.

One of the main functions of the River Basis District is the formulation of River Basin Plans. The Western River Basin Plan has been used as a source to aid in determining an overall picture of water quality in the area. The Western River Basin District Plan is further divided into a number of local areas for which individual plans have been drafted. The Garavogue Water Management Unit Action Plan is the most relevant plan to the current project and is attached in **Appendix VI.**

The proposed development is deemed required to ensure that the requirements of the Surface Water Regulations S.I. No. 272 of 2009 and the Urban Wastewater Treatment Regulations S.I. No. 254 of 2001 are met. The resultant improved quality of effluent will lead to a positive in combination effect with the Western River Basin District Plan and will contribute positively to the overall aim of the Western River Basin District Plan *i.e.* to achieve the water quality objectives of the Water Framework Directive in order to halt and reverse the decline in water quality.

Garavogue Water Management Unit Action Plan

A variety of Pressures and Risks are identified in the Garavogue Water Management Unit Action Plan which is included in **Appendix VI.** A list of point sources with potential to impact on the Garavogue and Drumcliff estuaries identified within the Garavogue Water Management Unit Action plan are presented below.

Wastewater Treatment Works within WMU – 11:

- 3 in Leitrim: Dromahaire WWTP (stated as at construction in WSIP 07-09), Manorhamilton WTTP, Killargue WWTP
- 8 in Sligo: Ballintogher WWTP, Cliffoney WWTP, Grange WWTP, Rosses Point WWTP, Strandhill WWTP, Drumcliff 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)

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.

Pressure Risk

The Strandhill WwTW has been identified in the Action Plan as a "*Pressure/Risk*" in the Garavogue Water Management Unit. This pressure relates to the risk to water quality relating to insufficient WwTP capacity and insufficient assimilative capacity for BOD.

However, it is noted in this plan that water quality data available would suggest that the plant is not having a significant impact on water quality.

The upgrade of the Strandhill WwTW will lead to a positive in combination impact with the Garavogue Water Management Unit Action Plan through the improvement of the wastewater infrastructure and effluent quality. The proposed Scheme will remove the Strandhill WwTW as a point source pressure/risk in this Waste Management Unit.

Strandhill Beach Erosion Protection

In October 2012, Sligo County Council sought the approval of An Bord Pleanála under Section 177AE(3) of the Planning and Development Act 20001 for the repair /adjustment / construction of approximately 100m linear metres of coastal protection works to preserve the existing coastal path south of Strandhill Beach car park from further erosion and to restore access from the coastal path (protected by a rock revetment and stone beach) down to beach level and access to the southern beach, Shelly Valley and the Dune peninsula. A Natura Impact Statement (NIS) was been prepared in September 2012 in respect of the proposed development, which took into account the in combination effects with proposed works at the Strandhill WwTW. Planning for the above works was granted in March 2013 and works are anticipated to commence in Autumn 2013.

The proposed development is in accordance with the Sligo County Development Plan and Strandhill Local Area Plan and with the proper planning and sustainable development of the area. It was concluded by An Board Pleanála that the erosion protection project in combination with other projects and plans will have minimal effect on Natura 2000 sites and is actually likely to protect the dune habitat by enhancing accretion to the area landward of the terminal structure and thereby reducing wave energy from attacking dunes.

Strandhill Waste Water Treatment Works is located to the northern end of the beach. A reinforced storm beach incorporating a coastal path was constructed on the upper beach fronting the Waste Water Treatment Works in 2011 to provide protection from storm wave erosion and overtopping /inundation during storm events.

Northern End of Beach.

The in-combination effects of the revetment at Strandhill WWTP was taken into consideration with the proposed beach erosion protection project in the above aforementioned NIS to ascertain whether the two projects have the potential to result in cumulative effects on the Natura 2000 site.

It was determined, that with the implementation of appropriate mitigation measures, the proposed project to undertake repairs to the rock beach revetment and to construct a fixed stone ramp to replace the storm-damaged mobile stone "*transition zone*" which was previously in place at the site, in combination with other project and plans, will not have a significant impact on the integrity of the four Natura 2000 sites which occupy parts of Strandhill Beach.

Site Boundary

In terms of in combination effects with the proposed WwTW upgrade, no impacts are predicted. All works relating to this WwTW upgrade will be taking place within the current site boundaries and will not be encroaching on the coastal protection works and designated dune habitats.

Sligo County Development Plan 2011-2017

An Appropriate Assessment Stage 1 Screening Report of the Sligo County Development Plan 2011-2017 concluded that the Plan has been formulated to ensure that uses, developments and effects arising from permissions based upon the Plan (either individually or in combination with other plans or projects) shall not give rise to significant effects on the integrity of any Natura 2000 sites.

The main objectives of Sligo County Development Plan relating to the Natura 2000 network are presented below. Adherence to these objectives should ensure no future in combination impacts.

O-NH-1 *Protect and maintain favourable conservation status and the conservation value of all natural heritage sites designated or proposed for designation in accordance with European and national legislation and in other relevant international conventions, agreements and processes. This includes sites designated or proposed as Special Areas of Conservation (SACs), Special Protection Areas (SPAs), Natural Heritage Areas (NHAs), Ramsar sites and Statutory Nature Reserves.*

O-NH-1a *Promote the maintenance and as appropriate achievement of favourable conservation status of protected habitats and species in association with NPWS.*

O-NH-2 *Assess, in accordance with the relevant legislation, all proposed developments which are likely to have a significant effect (directly or through indirect or cumulative impact) on designated natural heritage sites, sites proposed for designation and protected species.*

O-NH-3 *When considering any plan or project, the planning authority must comply fully with Article 6 of the EU Habitats Directive (as transposed into Irish Law by the EU Habitats*

Regulations 1997 and subsequent amendments) and assess whether the plan or project is likely to have a significant impact upon the integrity, conservation objectives and qualifying interests of any Natura 2000 site.

O-NH-4 *Consult with the relevant prescribed bodies and appropriate agencies when considering undertaking, approving or authorising developments which are likely to affect designated natural heritage sites or those proposed to be designated.*

O-NH-5 *Establish and maintain an up-to-date planning register of all previously adopted and proposed plans/programmes and all granted and proposed developments which are likely to have a significant effect (directly or through indirect or cumulative impact) on European Sites within or adjoining the county, to allow for the appropriate assessment of potential 'ex situ' and 'cumulative/in combination' effects of proposed plans, programmes and projects on such sites.*

O-NH-5a *An appropriate assessment screening determination shall be made for all land use plans, related variations and projects in consultation with the National Parks and Wildlife Service with the Department of the Environment, Heritage and Local Government.'*

O-NH-6 *Support and co-operate with statutory authorities and others in support of measures taken to manage designated nature conservation sites in order to achieve their conservation objectives and where available specific regard shall be made to Conservation Management Plans and their conservation objectives/management practices where they exist.*

O-NH-7 *Promote development for recreational and educational purposes that would not conflict with maintaining favourable conservation status and the meeting of the conservation objectives for designated sites.*

It is an objective of the County Development Plan to construct a new wastewater treatment plant at Strandhill (*i.e.* **O-WW-1** *Complete the construction of the new wastewater treatment plants at Tobercurry, Grange, Strandhill and Ballinafad*). Therefore the proposed upgrade of the Strandhill WwTW will lead a positive in combination effect with this Development Plan, in terms of ensuring the implementation of Objective **O-WW-1** above.

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

The Strandhill Local Area Plan was adopted in 2003. It remained in force for six years, after which its life was extended by three years, to 2012. In accordance with the Planning and Development Act 2000 this Local Area Plan must now be amended or revoked. It is

the intention of the Sligo County Council to revoke the Local Area Plan and replace it with a Mini Plan, which will be incorporated in the County Development Plan as a variation (*i.e.* Variation No. 1). This will ensure that the plan for Strandhill is consistent with the policies and objectives of the CDP 2011, in particular the provisions of the Core Strategy in terms of population and housing land and the requirements of the Habitats Directive.

A Stage 2 Appropriate Assessment was undertaken on the Draft Strandhill Mini-Plan. The Appropriate Assessment Screening (Stage 1) identified that there was potential for likely significant effect arising from the adoption and implementation of the draft Mini-Plan. Accordingly, Stage 2 Appropriate Assessment and the preparation of a Natura Impact Report) was undertaken to identify potential likely significant effects on Natura 2000 sites arising from the implementation of the draft Mini-Plan.

The main objectives of the draft Mini Plan are as follows:

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. '

Where it was identified that some elements of the draft Mini-Plan had potential to result in adverse effects on the integrity of a Natura 2000 site, mitigation measures in the form of amendments to the draft Mini-Plan were proposed in the Natura Impact Report. The mitigation measures seek to prevent inappropriate development that could result in significant negative impacts on the conservation objectives of Natura 2000 sites from occurring within the boundaries of the Natura 2000 sites, or adjacent to such sites.

The Natura Impact Report recommended the following amendments (bold italic text) to the draft Plan:

Section 44.1 Landscape, natural heritage, open space

Obj. G *'Provide for a number of incidental public open spaces, notably: i. the Sligo entrance to the village, between the new and old R292, where a floral or shrub display might be developed, possibly in conjunction with a piece of public art (location marked OS1 on Objectives Map);* 32 *ii. a strip of land to the east of the Airport Road, which would lend itself to a tree and shrub belt for amenity and shelter purposes (location marked OS2*

on Objectives Map).' iii. Require any development on the site of Seaview House on Upper Buenos Ayres Drive to retain and landscape a substantial element of open space at the eastern end of the existing garden (location marked OS3 on Objectives Map).

Should be amended to:

'Provide for a number of incidental public open spaces ***whilst ensuring the protection of designated sites through screening for Appropriate Assessment****, notably: i. the Sligo entrance to the village, between the new and old R292, where a floral or shrub display might be developed, possibly in conjunction with a piece of public art (location marked OS1 on Objectives Map); ii. a strip of land to the east of the Airport Road, which would lend itself to a tree and shrub belt for amenity and shelter purposes (location marked OS2 on Objectives Map).' iii. Require any development on the site of Seaview House on Upper Buenos Ayres Drive to retain and landscape a substantial element of open space at the eastern end of the existing garden (location marked OS3 on Objectives Map).*

Section 44.2 Coastal Protection

Obj. A *'Prepare an integrated coastal management plan for Strandhill in consultation with relevant agencies and interested parties. This plan should address, inter alia, the existing and potential recreational uses of the area.'*

AA process not done

Should be amended to:

'Prepare an integrated coastal management plan for Strandhill in consultation with relevant agencies and interested parties. This plan should address, inter alia, the existing and potential recreational uses of the area. ***The coastal management plan will ensure the protection of Natura 2000 sites through the Appropriate Assessment process****.'*

Obj. D *'Maintain and review dune management, to include, where necessary, appropriate fencing, boardwalks and public information boards.'*

Should be amended to:

Maintain and review dune management to include, where necessary, appropriate fencing, boardwalks and public information boards, ***in consultation with the National Parks and Wildlife Service of the DAHG****.'*

Section 44.4 Mixed Use Zones

Obj. D. *'Encourage the redevelopment of the Promenade 'Corner' on the sea front (MIX 1, Objectives Map) currently comprising shops, dwellings and a public open space, subject to any necessary coastal protection measures.'*

Should be amended to:

'Encourage the redevelopment of the Promenade 'Corner' on the sea front (MIX 1, Objectives Map) currently comprising shops, dwellings and a public open space, subject to any necessary coastal protection measures ***whilst ensuring the protection of designated sites through screening for Appropriate Assessment at project level.'***

Section 44.5 Transport, circulation and parking

Obj. A. *'Reserve land for a New Airport Road linking the R292 to the existing Airport Road (R277).'*

Should be amended to:

'Reserve land for a New Airport Road linking the R292 to the existing Airport Road (R277) ***whilst ensuring the protection of designated sites through screening for Appropriate Assessment at project level.'***

Obj. C *'Extend the Promenade in a northerly direction and link up with the existing Airport Road as indicated on the Objectives Map, to include for the upgrading of the existing lane from the caravan park to the Airport Road. All necessary coastal protection measures should be incorporated into such a project. This extension should be developed in a similar fashion to the existing Promenade whilst also preserving as much as possible of the seafront area as a public amenity.'*

Should be amended to:

'Extend the Promenade in a northerly direction and link up with the existing Airport Road as indicated on the Objectives Map, to include for the upgrading of the existing lane from the caravan park to the Airport Road ***whilst taking full account of the need to protect the natural and cultural heritage of the coast and the need to avoid significant adverse impacts on Natura 2000 Sites and on species protected by law.*** *All necessary coastal protection measures should be incorporated into such a project. This extension should be developed in a similar fashion to the existing Promenade whilst also preserving as much as possible of the seafront area as a public amenity.'*

Section 44.6 Community Facilities

Obj. B *'Require any development proposed on the greenfield site CF1 (refer to the Objectives Map) to provide a range of facilities such as a citizens' advice point, social services, tourist information, skate park and indoor sports. A youth centre and childcare facilities may be provided within the same building or in a separate structure.'*

Should be amended to:

'Require any development proposed on the Greenfield site CF1 (refer to the Objectives Map) ***to ensure the protection of designated sites through screening for Appropriate Assessment at project level. Any proposed development shall provide*** *a range of facilities such as a citizens' advice point, social services, tourist information, skate park and indoor sports. A youth centre and childcare facilities may be provided within the same building or in a separate structure.'*

Section 44.7 Tourism Development

Obj. A. *'Promote the development of tourism related-infrastructure and facilities within the village in order to increase visitor numbers and to create more local employment.'*

Should be amended to:

'Promote the development of tourism related-infrastructure and facilities within the village in order to increase visitor numbers and to create more local employment, ***subject to Appropriate Assessment under the Habitats Directive'.***

Subject to AA

Obj. B. *'Provide a public parking and picnic area to the north of the caravan park, in conjunction with the new road (See Section 44.5). This area will be located adjacent to the existing caravan park entrance, from where two-way traffic movements will operate (location marked TRANS 2 on the Objectives Map). In addition, adequate provision will be made for alternative circulation arrangements within the caravan park.'*

Should be amended to:

'Provide a public parking and picnic area to the north of the caravan park, in conjunction with the new road (See Section 44.5), ***subject to Appropriate Assesment under the Habitats Directive and the implementation of a Coastal Management Plan (Obj. 44.2 A) and a Management Plan for the Council lands at Killaspugbrone (Obj. 44.1 B.).*** *This area will be located adjacent to the existing caravan park entrance, from where two-way traffic movements will operate (location marked TRANS 2 on the Objectives Map). In addition, adequate provision will be made for alternative circulation arrangements within the caravan park.'*

Appropriate Assessment not done

Section 44.9 Buffer Zone

Obj. B *'Require all new and replacement agricultural structures to be designed in such manner that they do not interfere with the character of the landscape.'*

Should be amended to:

'Require all new and replacement agricultural structures to be designed in such manner that they do not interfere with the character of the landscape, ***whilst ensuring the protection of designated sites through screening for Appropriate Assessment at project level'.***

Section 44.10 Wastewater Treatment

Obj. A. *'Upgrade the wastewater treatment plant at Killaspugbrone to cater for a population equivalent (PE) of circa 3,000.'*

Should be amended to:

'Upgrade the wastewater treatment plant at Killaspugbrone to cater for a population equivalent (PE) of circa 3,000, ***whilst ensuring the protection of designated sites through undertaking Appropriate Assessment at project level.'***

Together with the Council's commitments to the Habitats Directive and Appropriate Assessment that are presented in the Sligo County Development Plan 2011-2017 and the Strandhill draft Mini-Plan, it is concluded that there will be no adverse cumulative effects on the integrity of Natura 2000 sites arising from the implementation of the draft Mini-Plan in combination with the proposed WwTW upgrade.

The upgrade of the works at Strandhill will lead a positive in combination effect with the draft Strandhill Mini, in terms of ensuring the implementation of Objective A of Section 44.10 Wastewater Treatment of the draft Min-Plan.

Ballysadare Bay Mini Plan and Cummeen Strand/Drumcliff Mini-Plan

Section 13.1 (Landscape, natural heritage, open space) policies of the Sligo County Development outline the General Policies relating to the mini-plans:

13.1 F. *When considering any proposed development within the mini-plan areas, the planning authority must comply fully with Article 6 of the EU Habitats Directive (as transposed to Irish Law by the EU Habitats Regulations 1997 and subsequent amendments) and assess whether the proposed development is likely to have a significant impact upon the integrity, conservation objectives and qualifying interests of the Natura 2000 site, notwithstanding any particular mini-plan objective that may apply to the relevant lands.*

The main objective of the **Ballysadare Bay Mini-Plan** is aimed at the protection of Natura 2000 sites is **20.1 A.** *Maintain and enhance the conservation value of the Ballysadare Bay cSAC/SPA*, and **20.1 I.** *Retain, protect and integrate significant vegetation into new development – particularly mature trees or groups of trees, hedgerows and vegetation of importance to wildlife.*

The main objective of the **Cummeen Strand/Drumcliff Mini-Plan** is **32.1 A.** *Encourage the protection and enhancement of the conservation value of Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC/pNHA.*

The construction and operation of the proposed upgraded WwTW and associated Pumping Stations will lead to a positive interaction with the above objectives in terms of ensuring the discharge effluent from the works will be compliant with all relevant regulations and legislation, thereby ensuring that that the water dependent qualifying feature/interests of the Cummeen Strand SPA, Cummeen Strand/Drumcliff Bay SAC and the Ballysadare Bay SAC/SPA are protected.

2.8 Likely direct, indirect or secondary impacts of the project (either alone or in combination with other plans or projects) on the Natura 2000 site

The individual elements of the project with potential to give rise to impacts (either alone or in combinations with other plans or projects) on Natura 2000 sites are outlined in the sub section below.

2.8.1 Potential Impacts Arising from Construction

Due to the nature of maintenance works required at the Airport and Bridge Pumping Stations, no potential impacts, arising from these works, on Natura 2000 sites are anticipated.

The elements of the upgrade construction works associated with the WwTW and Caravan Park (West End) PS which may give rise to impacts on nearby SAC's and SPA's include:-

- ***Impacts on Water Quality arising from Poorly Managed Construction Processes***

While there is potential for construction activities to have an impact on water quality within the Natura 2000 sites, a number of standard construction practices will be put in place to ensure risks from surface water run-off are minimised in accordance with the Water Pollution Act 1977 and all other relevant legislation.

- ***Impacts on Habitats associated with Construction Activities***

There is potential that construction works could impact on priority habitats such as:

- Fixed coastal dunes with herbaceous vegetation ("*grey dunes*") [2130]

Impacts on this habitat however will not be significant as:

- It is proposed that all works be undertaken within the existing site boundaries. No protected habitats are located within the boundary of the existing WwTW and PS sites.
- Construction vehicles will be strictly prohibited from entering the dune habitat which borders the WwTW and PS sites.
- The only access to the WwTW and PS sites will be through the existing site access roads.
- All spoil is to be stored in temporary storage areas away from the sensitive habitat features.

Dr Evelyn Moorkens

- ***Impacts on Vertigo angustior associated with Construction Activities***

A molluscan survey was undertaken by Dr. Evelyn Moorkens on 12th August 2013 in the areas both inside and outside the fence surrounding Strandhill Sewage Treatment Works and Strandhill Caravan Park Pumping Station. The sewage treatment works area is an exclusion from within the Cummeen Strand / Drumcliff Bay SAC (00627) (revised drawing), and the Strandhill caravan park area is to the south of the same SAC, and to the north of the Ballysadare Bay SAC (00622) which are both designated for the Annex II snail species *Vertigo angustior* as well as a variety of Annex I habitats. The aim of the survey was to look for the presence or absence of *Vertigo angustior* in the immediate area around and in front of the current fenced works area and the pumping station area, and to consider the results with respect to the potential impact of the upgrade works proposed in these works areas. The full survey report is contained in **Appendix VII** of this report.

Deleted

An assessment of the potential impact of the proposed works at the two sites were assessed in terms of 1) the direct impact on the areas where the works are proposed, and 2) the indirect impacts on habitats occurring outside the footprint of the proposed works.

1) Assessment of the direct impact on the areas where the works are proposed

As no habitat was found for *Vertigo angustior* at either inside the Strandhill WWTP compound, or within the footprint of the West End (Caravan Park) pumping station, no direct impacts on *V. angustior* are possible from the proposed works.

2) Assessment of the indirect impacts on habitats occurring outside the footprint of the proposed works.

Potential negative impacts from works on areas of habitat nearby could be caused by:

a) Drainage of an area nearby, resulting in a loss of water through overland or subsurface flow to the habitat outside the works.
b) Disturbance of topography or subsurface flow of an area nearby, causing a change of direction or quantity of subsurface water to the habitat outside the works
c) Any in-combination or cumulative effect that could lead to disturbance of the hydrogeology of the habitat outside the works.

At the West End (Caravan Park) Pumping Station area, the surrounding habitat is fragmented and marginal, and the area within the zone of hydrogeological influence of the proposed works is outside any designated area. The potential adverse indirect effects from the proposed works to the Pumping Station influence are considered to be negligible.

The area surrounding the Strandhill WwTP site is, by contrast, of very high conservation value being surrounded by the Cummeen Strand / Drumcliff Bay SAC (Site Code: 00627). The hydrogeology regime of the fixed dune and dune slack areas of the cSAC are maintained through surface and sub-surface flow through the porous sands and soils laid down over the Carboniferous limestone bedrock of the area. The area of the Strandhill WwTP site is relatively flat and therefore the sands and soils are considered to be evenly distributed across the area, thus are likely to supply an even quantity of subsurface water to the surrounding area from the part of the site that is not currently built on.

The current operational area of the site is to be decommissioned after the proposed upgraded treatment plant is complete. In order to supply an equal amount of porous sand and subsoil to that which is present within the compound, all excavated material will be stockpiled within the compound, with care being taken to keep the sand and soil components separate, clean and covered during the period of construction. When the new works area is operational, the old machinery and tanks will be carefully removed, and the stockpiled sand and soil will be carefully placed in the cleared area, with the same soil and sand horizon profile as that which was removed for the construction. As modern treatment plants are generally smaller and more efficient than older plants, the full quantity of excavated matter should be available for use. It will be a conditions in the Contract Documents that no additional external fill will be allowed in this area.

It will also be a condition of the Contract Documents that the design of the new system shall be no bigger or deeper than the existing plant. The design, construction and operation of the new systems will be done in full knowledge of the sensitive cSAC that surrounds the site and all aspects of the project will be carried out to ensure the protection of the structure and function of the surrounding habitats and species.

Based on the above it can be concluded that the hydrogeological system will have no net loss in the long term and that the temporary disturbance to the hydrogeological regime during construction will be minimal. The operational phase compound will be equal to the old one in terms of drainage and hydrogeological support, and thus will not contribute any in-combination or cumulative effects. Therefore, the long term effect on the *Vertigo angustior* population of the proposed works can be considered to be negligible.

- ***Disturbance of Birds during Construction Activities***

Construction works in general have the potential to impact on SPAs' by disturbances such as the noise of machinery and increased human activity. Cummeen Strand SPA and Ballysadare Bay SPA are of high ornithological importance for wintering waterbirds.

The species most likely to be affected are wintering populations of Grey Plover, Dunlin, Bar-tailed Godwit, Redshank and Greenshank. Although the main area roosting/feeding for these species is within Ballysadare Bay, small numbers may roost within the sand dunes or upper beach in southern Strandhill or may feed on the lower beach at the water's edge. Noise from construction machinery and a temporary increase in human activity may cause disturbances and a resultant temporary redistribution of feeding or roosting birds. However there is already significant amounts of human activity within the dunes and along the beach and birds may be already reduced in their distribution or else will be reasonably accustomed to the presence of people and activity. The SPA's are of sufficient area whereby any affected birds may temporarily relocate to nearby areas which will be unaffected by the proposed upgrade works. Any disturbance will be temporary and the SPA qualifying species will have the potential to return to the area once human activity and noise level decreases.

2.8.2 Potential Impacts Arising from Operation

- ***Impacts on Water Quality arising from the Operation of Scheme***

Reflect legislative

The final treated effluent from the WwTW will be subject to strict quality standards that reflect the legislative status of the discharge and are also environmentally protective with the specific requirements of Sligo Bay. This will ensure that there are no significant adverse effects on the water quality in the Bay and hence protect the aquatic ecological receptors present. This is the principal protective measures employed in relation to operational discharges from WwTWs. In accordance with the requirements of the Waste Water Discharge (Authorisation) Regulations, 2007 (S.I. No. 684 of 2007), all discharges to the aquatic environment from sewerage systems owned, managed and operated by water service authorities will require a waste water discharge licence or certificate of authorisation from the EPA. An EPA Waste Water Discharge Licence is therefore required

for the proposed Scheme. Adherence to the limits as set out in the EPA discharge licence will ensure compliance with all relevant regulatory requirements and protection of water quality within Sligo Bay.

Once the proposed Scheme has been successfully commissioned, the improvement in treated effluent entering the bay will result in an improvement in water quality within the Bay. Bacterial loads to the bay will decrease as will suspended solids, nutrients and the Biological Oxygen Demand (BOD). This will have the effect of improving the existing water quality in terms of nutrient status, oxygen levels and bacterial loading. Such improvements will also benefit the local shellfisheries. Effects arising from the discharge of effluent from the current outfall location, along with alternative locations, were modelled by Aquafact in June 2013 (see **Appendix VIII** for full Hydrodynamic Dispersion Modelling Report). The current outfall location with disinfection was deemed the recommended outfall option. The report reveals that the effects on water quality will be negligible. The mixing and dispersion rate of effluent within the Bay was found to be sufficiently rapid to ensure that there will not be any deleterious effect on water quality within the Bay. The level of dissolved Inorganic Nitrogen required by the Surface Water Regulations for "*High Status*" of 0.19 mg N/l will be achieved within the mixing zone in the immediate area of the outfall and is therefore acceptable.

When specifying the storm water requirements for the proposed WwTW, best practice will be applied. The proposed plant will include a storm water storage tank sized to store storm water for 2 hours flow from between 3 to 6 DWF from an agglomeration with a PE of 3,000. The plant will be designated to treat wastewater flows up to 3DWF (*i.e.* 3 times the dry weather flow). Flows above the 3DWF shall overflow to the storm tank. In an overflow event, the storm water flow will be subject to preliminary treatment. The flow will also be extremely diluted and primary treatment, *i.e.* settlement, will have occurred. The likelihood of an overflow from the new plant is lower than the likelihood at the current arrangement and therefore the new plant improves the excising situation. Dial-out alarms will also ensure that system failures are addressed within a short period of time thus minimizing the possibility of an accidental release of partially untreated wastewater. The scale and frequency of such an event would also be extremely limited. Continuous monitoring of final effluent will also alert operators to any non-routine occurrences. The proposed plant will ensure increased capacity and storage, and will ensure wastewater is treated to a higher quality than is currently achieved.

2.8.3 Potential In Combination Impacts

In order to address the cumulative impacts of the proposed Scheme, a review of Sligo County Council's planning search online mapping application was carried out to determine

other proposed developments/projects in the Strandhill area. There is one development proposed in the vicinity of the site as listed below:

- Development of a two-storey extension to the existing coastguard (CHC Ireland Ltd.) hangar 4, retention permission is also sought for the continued use as car parking of the existing fenced car park area at Sligo Airport

No negative in combination impacts with the above proposed development during the operation and construction of the proposed WwTW upgrade are predicted once the above development complies with their specific planning conditions. Refer to **Section 2.7.3** for potential in combination impacts with plans and projects pertinent to Strandhill and its surrounding environs.

It is also worth noting that in line with **Policy P-DCA-4** of the County Development Plan (*i.e. Any development proposal in coastal areas will be subject to the requirements of the Habitats Directive, including the assessment of potential cumulative, in-combination effects in association with other, plans, programmes, projects and works.*), any future projects or plans in Strandhill and its coastal environs will require Appropriate Assessment screening and therefore future in combination impacts are not anticipated.

2.9 Likely changes to the site as a result of the project/plan

The likely changes to Natura 2000 sites as a result of the project are presented below in **Tables 2.5, 2.6, 2.7** and **2.8**.

Table 2.5 Summary of changes to Cummeen Strand/Drumcliff Bay SAC as a result of the project

Impact Type	No Significant Changes Anticipated
Disturbance	No disturbance to habitats.
Water Quality	No adverse impacts.
Fragmentation	No fragmentation of habitats.
Species density/ abundance	No adverse impacts, no changes in species abundance/density.
Water resources	No adverse change.

Table 2.6 Summary of changes to the Ballysadare Bay SAC as a result of the project

Impact Type	No Significant Changes Anticipated
Disturbance	No disturbance to habitats.
Water Quality	No adverse impacts
Fragmentation	No fragmentation of habitats
Species density/ abundance	No adverse impact, no changes in species abundance/density
Water resources	No adverse change

Table 2.7 Summary of changes to the Cummeen Strand SPA as a result of the project

Impact Type	No Significant Changes Anticipated
Disturbance	Potential disturbance impacts to small numbers of overwintering bird species that frequent this site as a result of increased human activity and increased noise close to the designated site. Disturbance could result in the temporary redistribution of designated site feature species. However, any disturbance to species is not considered significant.
Water Quality	No adverse impacts
Fragmentation	No fragmentation of habitats
Species density/ abundance	No adverse impact, no changes in species abundance/density
Water resources	No adverse change

Table 2.8 Summary of changes to the Ballysadare Bay SPA as a result of the project

Impact Type	No Significant Changes Anticipated
Disturbance	Potential disturbance impacts to small numbers of overwintering bird species that frequent this site as a result of increased human activity and increased noise close to the designated site. Disturbance could result in the temporary redistribution of designated site feature species. However, any disturbance to species is not considered significant.
Water Quality	No adverse impacts
Fragmentation	No fragmentation of habitats
Species density/ abundance	No adverse impact, no changes in species abundance/density
Water resources	No adverse change

2.10 Likely Impacts on the Natura 2000 site as a whole

The integrity of a site is the coherence of its ecological structure and function, across its whole area, which enables it to sustain the habitat, complex of habitats and/or the levels of populations of the species for which it was classified.

The potential impacts of the proposed works (either alone or in combination with other plans and projects) on Natura 2000 sites are listed below.

- *Interference with the key relationships that define the structure of the site:*

The structure of the Natura 2000 sites will not be impacted by the construction upgrade works and operation of the WwTW and associated Pumping Stations.

- *Interference with key relationships that define the function of the site:*

The function of the Natura 2000 sites will not be impacted by the construction upgrade works and operation of the WwTW and associated Pumping Stations.

3. CONCLUSION

No significant impacts on Natura 2000 sites are predicted from the proposed upgrade of the Strandhill WwTW and West End (Caravan Park) Pumping Station or maintenance works required at the Bridge and Airport Pumping Stations (alone or in combination with other projects or plans).

In identifying the potential issues which could affect the integrity of Natura 2000 sites a range of factors were taken into account, including possible effects manifesting themselves in the short, medium and long-term and in combination effects. In addition, the precautionary principle was adhered to in the carrying out of this assessment.

On the basis of the findings of this Screening for Appropriate Assessment of Natura 2000 sites, it is concluded that the proposed Strandhill WwTW upgrade will not have a significant effect on the Natura 2000 network and a Stage 2 Appropriate Assessment is not required.

4. FINDING OF NO SIGNIFICANT EFFECT (FONSE) REPORT

A Finding of No Significant Effect (FONSE) Report is the output document from the Stage 1 Appropriate Assessment Screening process where the project is not considered to be likely to have significant adverse effects on Natura 2000 sites. **Table 4.1** below presents the FONSE Report for the Strandhill WwTW upgrade.

Table 4.1 Finding of No Significant Effect (FONSE)

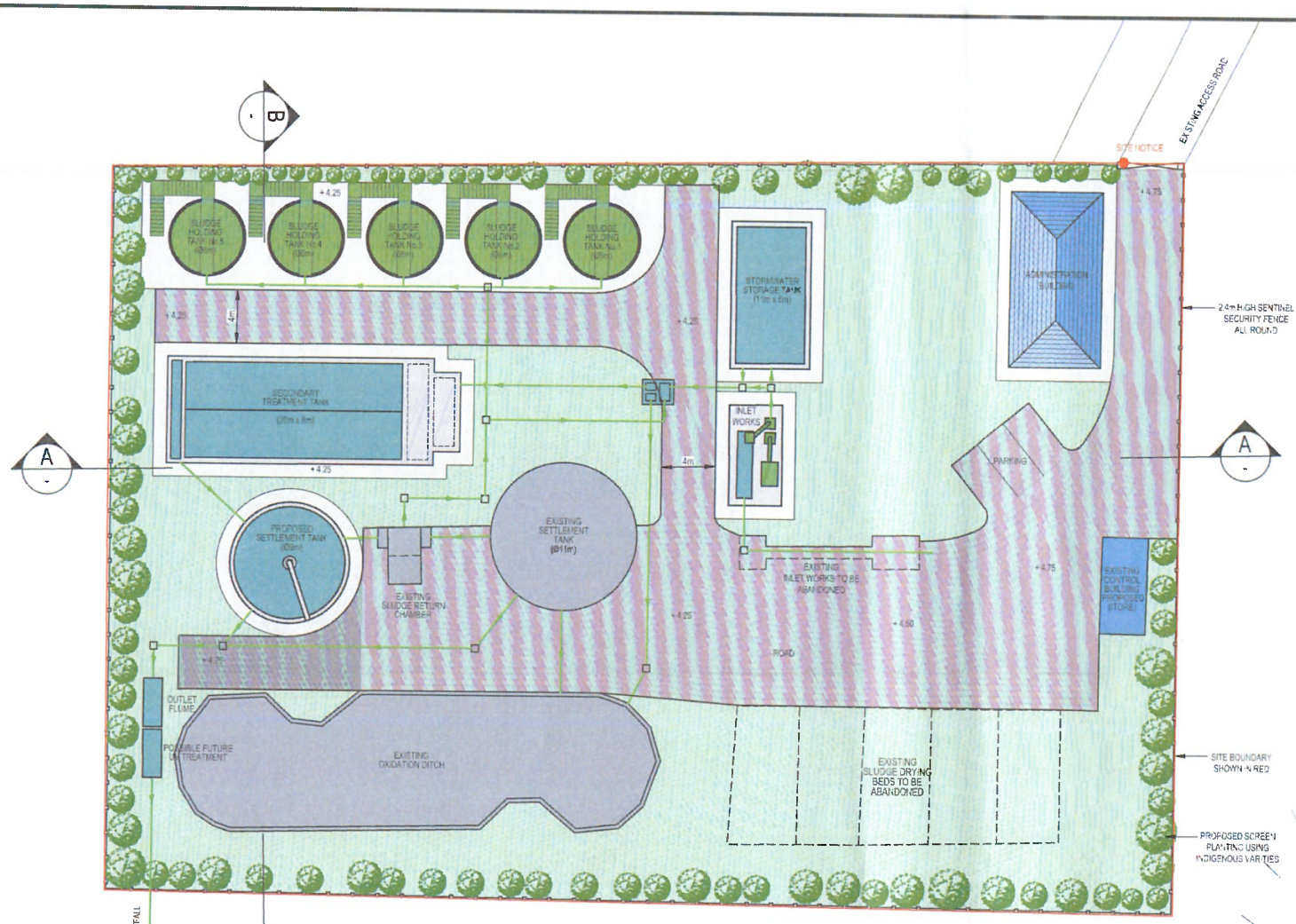
Project Description	
Name of project or plan	Strandhill WwTW Upgrade
Name and location of Natura 2000 site	Special Area of Conservation: • Cummeen Strand/Drumcliff Bay SAC • Ballysadare Bay SAC • Cummeen Strand SPA • Ballysadare Bay SPA
Description of the project or plan	The proposed scope of the works involved under the Proposed Scheme is summarised below and detailed further in Sections 2.2 and 2.3 of this report. The works shall be designed to treat wastewater from Strandhill to a PE equivalent of 3,000 and will consist of the following elements: • Administration building • Preliminary Treatment Units • Secondary Treatment Units • UV treatment • Storm Water Holding Tank • Sludge Holding Tank The proposed discharge will be through the existing outflow just below the low water mark at the northern end of Strandhill beach. As part of the Scheme, maintenance works will take place at the Bridge and Airport Pumping Stations within their site boundaries (*e.g.* pump replacement, electrical system upgrade). Due to the nature of these works no impacts are predicted on Natura 2000 sites. However, with regard to the West End (Caravan Park) PS, along with general maintenance works, this station will require the addition of a new storm tank with a capacity of 20 m^3 to provide storage for peak flows, a Control Kiosk and the mechanical upgrade of the pumping station.
Is the project or plan directly connected with or necessary to the management of the site (provide details)?	No

Assessment of Significance	
Describe how the project or plan (alone or in combination) is likely to affect the Natura 2000 Site.	The proposed works are not located within a SAC or SPA but are within the potential impact zone of the Cummeen Strand/Drumcliff Bay SAC, Ballysadare Bay SAC Cummeen Strand SPA and Ballysadare Bay SPA. The following are the key issues which are considered to be of importance in maintaining the integrity of the above sites and which could be affected by this project: • Protection of water quality • Maintain hydrogeological regime • Avoid disturbance of wintering birds protected by SPA • Ensure protection of terrestrial habitat/species protected by SAC.
Explain why these effects are not considered significant.	No significant impacts (either alone or in combination) are likely to effect the Natura 2000 sites as: • Existing habitat within the WwTP compound are already disturbed and irrecoverable. • Measures in design will be taken to maintain hydro/water quantity regime on site. • No soil import to site and biosecurity protocols adopted. • Implementation of best construction practices for protection of water quality during construction activities will ensure no significant impact on the SACs/SPAs. • Construction works will be limited to within the current boundaries of the WwTW and PS sites. • The effluent discharged from the WwTW will be of high standard, in line with the Urban Waste Water Treatment Regulations 2001 and the Surface Water Regulations 2009 and consider the Shellfish Waters Regulations 2006 (amended 2009). It is anticipated that the water quality of the Killaspug outflow point will improve as a result of the upgrade. • The plant will be designed to a very high specification ensuring that any maintenance/operation issues and emergency events are dealt with appropriately. Therefore, no significant impacts are predicted on species or habitats for which the Natura 2000 sites are designated.
List of agencies consulted	This Screening Report will be sent to the prescribed bodies (NPWS) as part of the consultation process.
Response to consultation	To be completed at end of the consultation process.

Overall Recommendations & Conclusions	
Overall recommendation and conclusion	Having regard to the location, nature and scale of the proposed project, it is considered that there is no potential for significant effects either from the proposed project on its own or in combination with other plans and projects, and therefore a Natura Impact Statement is not required in this instance.
Explain how the overall conclusion that there are no significant effects on the Natura 2000 site was arrived at	The overall conclusion that no significant effects on Natura 2000 sites are likely was determined following a methodological assessment carried out having regard to the guidance documents outlined in the following section of this FONSE report (Data collected to carry out the assessment). In identifying the potential issues which could affect the integrity of the Natura sites a range of factors were taken into account, including the possibility of effects manifesting themselves in the short, medium and long-term and in combination effects. In addition the precautionary principle was adhered to in the carrying out of this assessment.

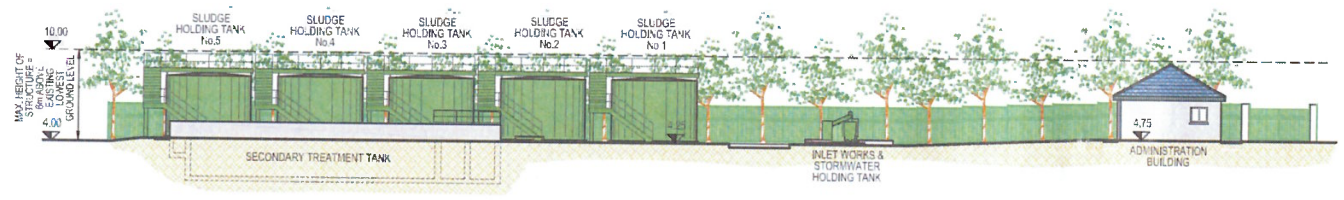
Data collected to carry out the Assessment			
Who carried out the assessment	**Sources of data**	**Level of assessment completed**	**Where can the full results of the assessment be accessed and viewed**
Serena Keane BMSc, Mres, Ecologist/Environmental Scientist Nicholas O Dwyer Ltd. Suvi Harris BSc, PhD, Ecologist/Environmental Scientist Nicholas O'Dwyer Ltd. Cróna Sheehan BSC, PhD, MCIEEM Environmental Scientist Nicholas O'Dwyer Ltd.	DEHLG (2009) Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities. European Commissions: Managing Natura 2000 Sites. The provisions of Article 6, of the 'Habitats' Directive 92/43/EEC European Commission: 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 Guidance document on Article 6(4) of 'Habitats Directive' 92/43/EEC The Status of EU Protected Habitats and Species in Ireland 2008, NPWS Sligo County Development Plan 2011-2015 Ballysadare Bay and Cummeen Strand/Drumcliff Mini-Plan Sligo County Council – Strandhill WwTW: Coastal Protection Scheme July 2009 Technical Feasibility Report Strandhill Beach Erosion Protection: Natura Impact Statement (to inform Appropriate Assessment) 20th September 2012	Desk Top and Site Visit by Evelyn Moorkens.	This report.

4/10

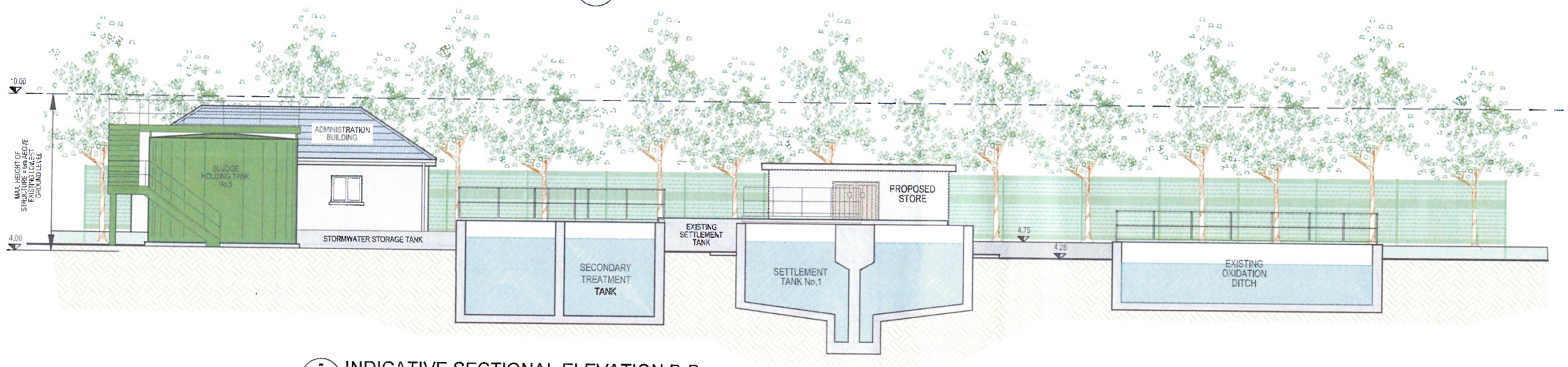


INDICATIVE SITE LAYOUT PLAN
1:250

INCLUDES ORDNANCE SURVEY IRELAND DATA REPRODUCED UNDER O.S.I. LICENCE NUMBER 2003/27/CCMA/SLIGO LOCAL AUTHORITIES. UNAUTHORISED REPRODUCTION INFRINGES ORDNANCE SURVEY IRELAND AND THE GOVERNMENT OF IRELAND COPYRIGHT.



INDICATIVE SECTIONAL ELEVATION A-A
1:250



INDICATIVE SECTIONAL ELEVATION B-B
1:100

NOTES

LEGEND

- EXISTING FENCELINE
- EXISTING TREATMENT UNITS / STRUCTURES
- PROPOSED TREATMENT UNITS / STRUCTURES
- PROPOSED ACCESS ROAD
- PROPOSED GRASSED AREA
- PROPOSED PROCESS PIPEWORK

0m 5m 10m
SCALE 1 : 250

5000mm 0 5000mm
SCALE 1 : 100

REV	DATE	DESCRIPTION	D	C	A
A	01.06.07	CLIENT'S COMMENTS INCORPORATED	D.S.	M.D.	M.D.

PLANNING

COPYRIGHT RESERVED - THIS DRAWING IS NOT TO BE USED FOR A PURPOSE OTHER THAN THAT FOR WHICH IT HAS BEEN ISSUED BY NICHOLAS O'DWYER LTD. NOR IS IT TO BE COPIED OR REPRODUCED IN ANY MANNER WITHOUT WRITTEN CONSENT

Nicholas O'Dwyer
CONSULTING ENGINEERS
Hartgrove Office Park, Hartgrove Avenue, Dublin 14
Tel: 01-296 9000 Fax: 01-296 9001 E-mail: nodwyer@nicholasodwyer.com

CLIENT
Sligo County Council
County Hall,
Riversdale,
Sligo.
Tel.: (071) 9156666 Fax: (071) 9141119

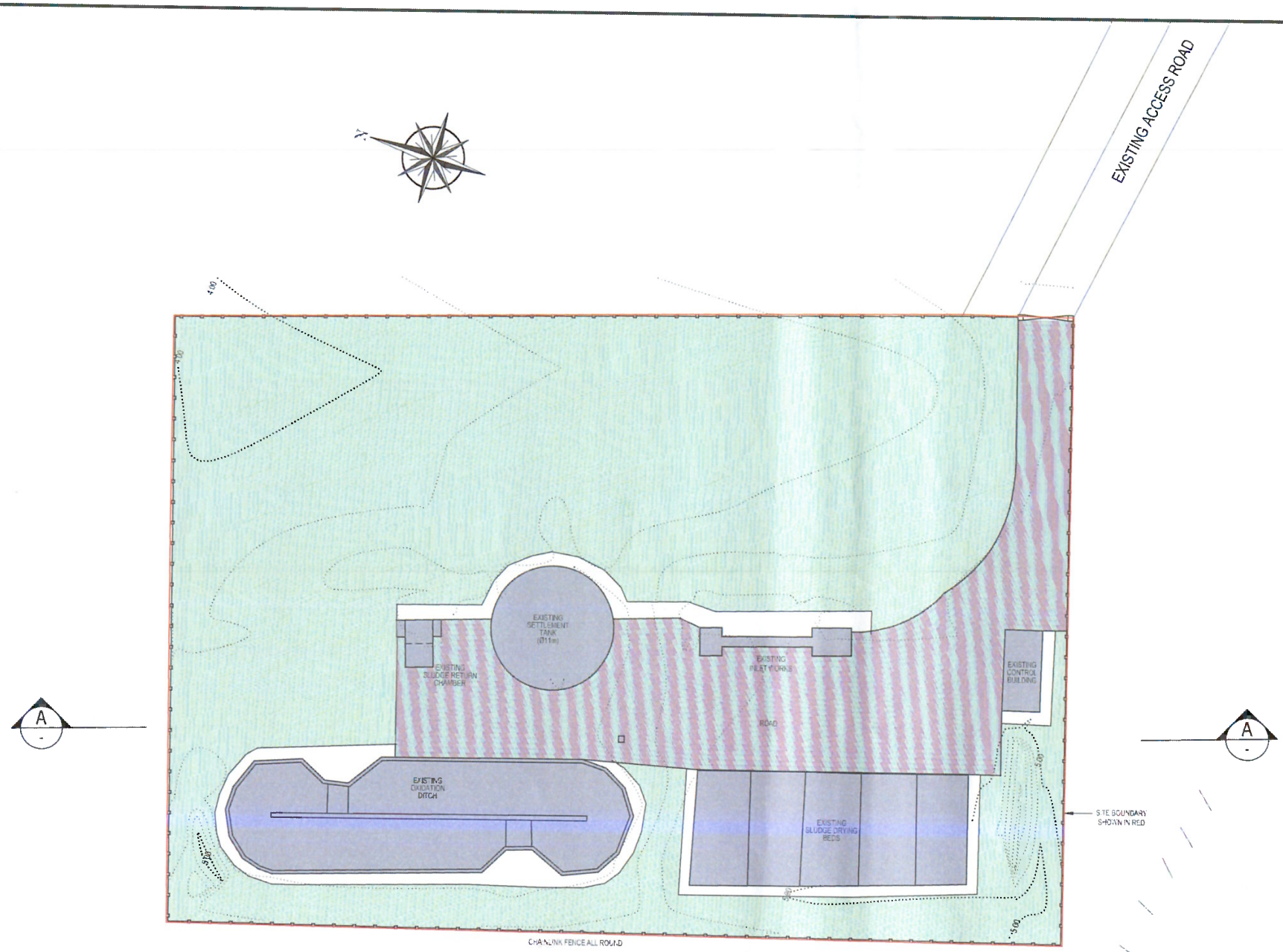
PROJECT
TUBBERCURRY,
GRANGE AND STRANDHILL
WASTEWATER TREATMENT PLANTS

TITLE
STRANDHILL
PROPOSED INDICATIVE
SITE LAYOUT PLAN & SECTION

SCALES	DRAWN	CHECKED	APPROVED
1:100 1:250 1:500	S.McGUINNESS	M. MADDEN	M. DAVITT
	DATE 08-05-07	DATE 08-05-07	DATE 08-05-07

DRAWING No. 20391-PC-SL-01

REV A



EXISTING SITE LAYOUT PLAN
1:250



SECTIONAL ELEVATION A-A
1:250

SCALE 1 : 250

INCLUDES ORDNANCE SURVEY IRELAND DATA REPRODUCED UNDER O.S.I. LICENCE NUMBER 2003/07/CCMA/SLIGO LOCAL AUTHORITIES. UNAUTHORISED REPRODUCTION INFRINGES ORDNANCE SURVEY IRELAND AND THE GOVERNMENT OF IRELAND COPYRIGHT.

NOTES

LEGEND

- EXISTING FENCELINE
- EXISTING TREATMENT UNITS / STRUCTURES
- PROPOSED TREATMENT UNITS / STRUCTURES
- PROPOSED ACCESS ROAD
- PROPOSED GRASSED AREA
- PROPOSED PROCESS PIPEWORK

REV	DATE	DESCRIPTION
		D
		C
		A

PLANNING

COPYRIGHT RESERVED - THIS DRAWING IS NOT TO BE USED FOR A PURPOSE OTHER THAN THAT FOR WHICH IT HAS BEEN ISSUED BY NICHOLAS O'DWYER LTD. NOR IS IT TO BE COPIED OR REPRODUCED IN ANY MANNER WITHOUT WRITTEN CONSENT

Nicholas O'Dwyer
CONSULTING ENGINEERS
Nutgrove Office Park, Nutgrove Avenue, Dublin 14
Tel: 01-296 9000 Fax: 01-296 9081 E-mail: nodwyer@nicholasodwyer.com

CLIENT
Sligo County Council
County Hall,
Riverside,
Sligo.
Tel: (071) 9156666 Fax: (071) 9141119

PROJECT
TUBBERCURRY,
GRANGE AND STRANDHILL
WASTEWATER TREATMENT PLANTS

TITLE
STRANDHILL
EXISTING
SITE LAYOUT PLAN & SECTION

SCALES	DRAWN	CHECKED	APPROVED
1:100 1:200 1:500	S.McGUINNESS	M. MADDEN	M. DAVITT
	DATE 08-05-07	DATE 08-05-07	DATE 08-05-07

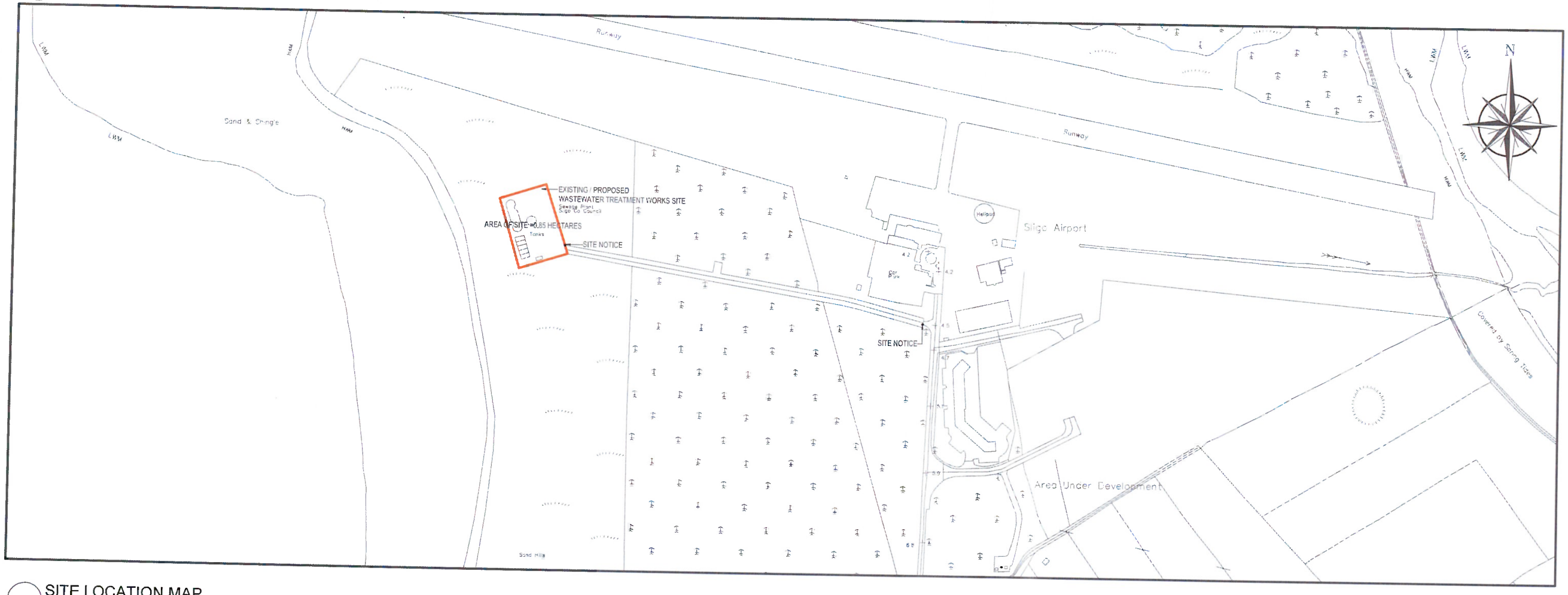
DRAWING No
20391-PC-SL-02

REV



SITE LOCATION PLAN

SCALE 1:1000



SITE LOCATION MAP

SCALE 1:2500

SCALE 1 : 2500

SCALE 1 : 1000

INCLUDES ORDNANCE SURVEY IRELAND DATA REPRODUCED UNDER O.S.I. LICENCE NUMBER 2003/07/CCMA/SLIGO LOCAL AUTHORITIES. UNAUTHORISED REPRODUCTION INFRINGES ORDNANCE SURVEY IRELAND AND THE GOVERNMENT OF IRELAND COPYRIGHT.

O.S.I. SHEET REFERENCE : 0951-C & 1010A

NOTES

LEGEND

EXISITNG / PROPOSED WwTW SITE

REV	DATE	DESCRIPTION	D	C	A

PLANNING

COPYRIGHT RESERVED - THIS DRAWING IS NOT TO BE USED FOR A PURPOSE OTHER THAN THAT FOR WHICH IT HAS BEEN ISSUED BY NICHOLAS O'DWYER LTD. NOR IS IT TO BE COPIED OR REPRODUCED IN ANY MANNER WITHOUT WRITTEN CONSENT.

Nicholas O'Dwyer
CONSULTING ENGINEERS
Nutgrove Office Park, Nutgrove Avenue, Dublin 14
Tel. 01-295 9090 Fax. 01-295 9091 E-mail nodwyer@nicholasodwyer.com

CLIENT

Sligo County Council
County Hall,
Riverside,
Sligo.
Tel : (071) 9156666 Fax : (071) 9141119

PROJECT

TUBBERCURRY, GRANGE & STRANDHILL WASTEWATER TREATMENT PLANTS

TITLE

STRANDHILL
WASTEWATER TREATMENT WORKS
SITE LOCATION PLAN

SCALES	DRAWN	CHECKED	APPROVED
1 : 2500 1 : 1000	J.Rousseau	M.Madden	M.Davitt
	DATE 05.06.07	DATE 05.06.07	DATE 05.06.07

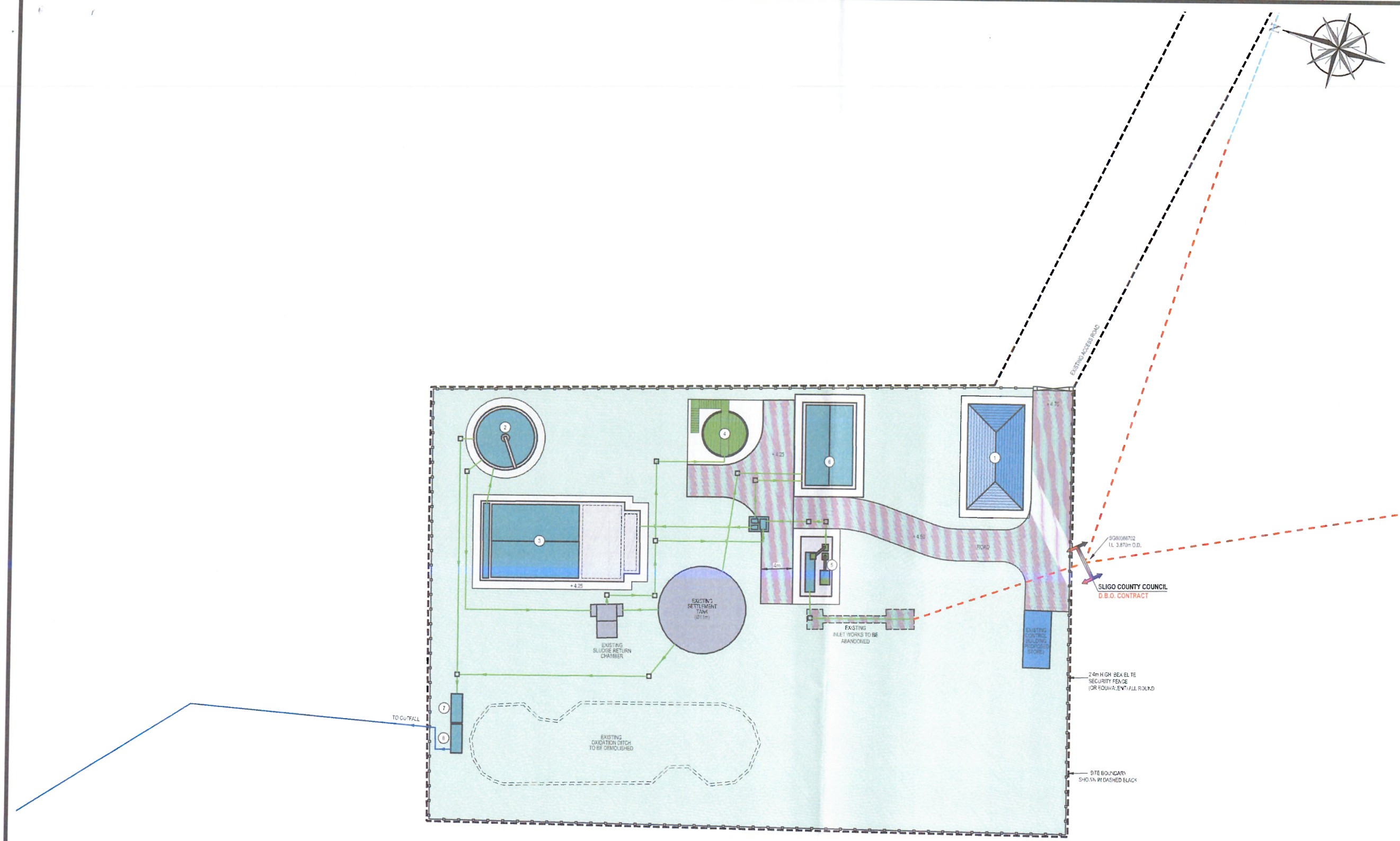
DRAWING No

20391-PC-SL-03

REV

APPENDIX II: DRAWINGS

5110



NOTES

LEGEND

- SITE BOUNDARY
- EXISTING FENCELINE
- EXISTING GRAVITY SEWER
- EXISTING RISING MAIN
- EXISTING TREATMENT UNITS / STRUCTURES
- PROPOSED TREATMENT UNITS / STRUCTURES
- PROPOSED ACCESS ROAD
- PROPOSED GRASSED AREA
- PROPOSED PROCESS PIPEWORK
- PIPELINE INTERFACE BETWEEN D.B.O. CONTRACTOR & SLIGO COUNTY COUNCIL — D.B.O. / S.C.C.

PROPOSED UNITS / STRUCTURES KEY

ADMINISTRATION / CONTROL BUILDING	1
SETTLEMENT TANK (Ø8m)	2
SECONDARY TREATMENT TANK (16m X 10m)	3
SLUDGE HOLDING TANK (Ø6m)	4
INLET WORKS	5
STORM STORAGE TANK (16m x 6m x 5m)	6
OUTLET FLUME	7
POSSIBLE FUTURE U.V. TREATMENT	8

25m 0 25m

SCALE 1 : 500

INCLUDES ORDNANCE SURVEY IRELAND DATA REPRODUCED UNDER O.S.I. LICENCE NUMBER 2003/07CCMA/SLIGO LOCAL AUTHORITIES. UNAUTHORISED REPRODUCTION INFRINGES ORDNANCE SURVEY IRELAND AND THE GOVERNMENT OF IRELAND COPYRIGHT.

REV	DATE	DESCRIPTION	D	C	A

PRELIMINARY

COPYRIGHT RESERVED - THIS DRAWING IS NOT TO BE USED FOR A PURPOSE OTHER THAN THAT FOR WHICH IT HAS BEEN ISSUED BY NICHOLAS O'DWYER LTD. NOR IS IT TO BE COPIED OR REPRODUCED IN ANY MANNER WITHOUT WRITTEN CONSENT

Nicholas O'Dwyer
CONSULTING ENGINEERS
Hedgrove Office Park, Hedgrove Avenue, Dublin 14
Tel 01-295 9700 Fax 01-295 9301 E-mail o.dwyer@nodwyer.com

CLIENT

Sligo County Council
Comhairle Chontae Shligigh
County Hall,
Riverside, Co Sligo
Tel (071) 9156666 Fax (071) 9141119

PROJECT

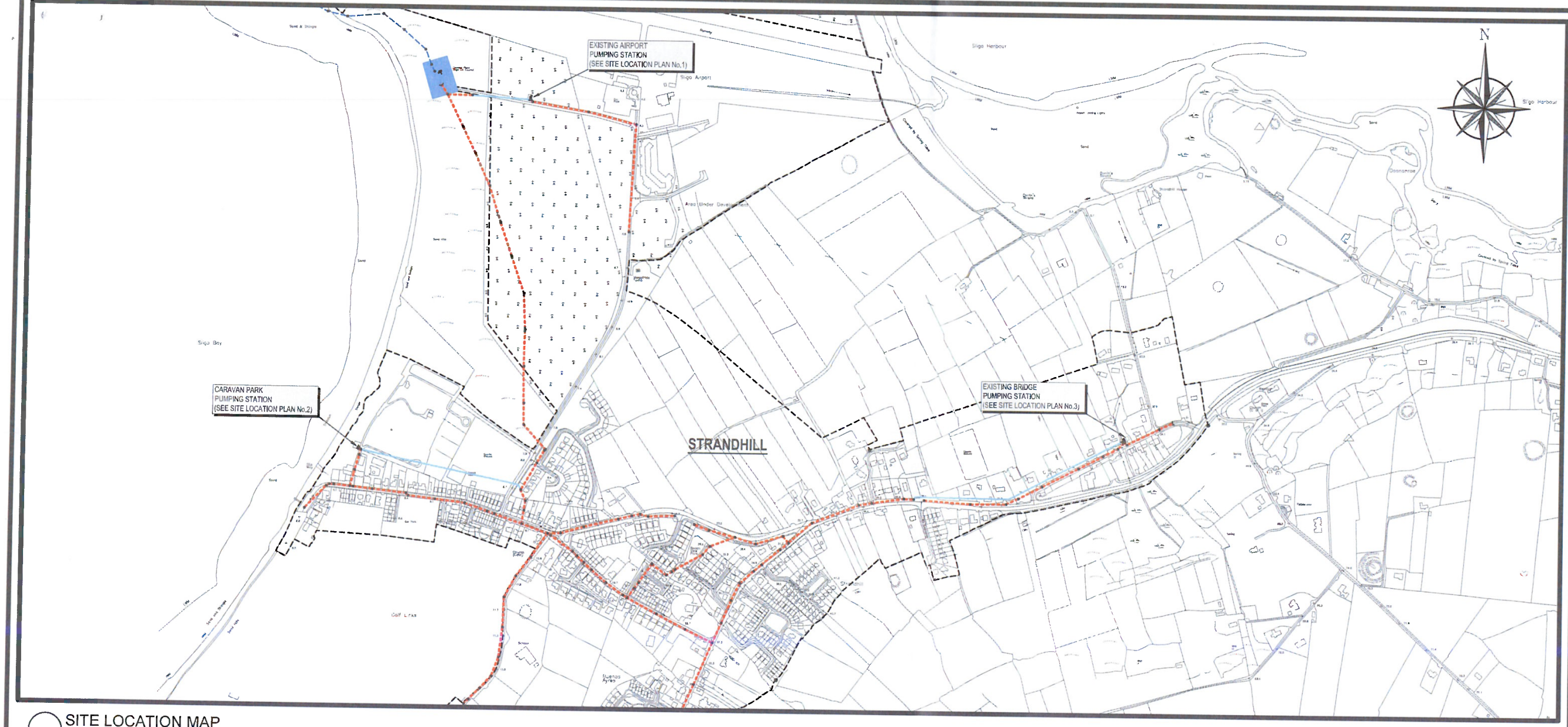
TUBBERCURRY, GRANGE & STRANDHILL DBO BUNDLE

TITLE

STRANDHILL WASTEWATER TREATMENT WORKS INDICATIVE SITE LAYOUT PLAN

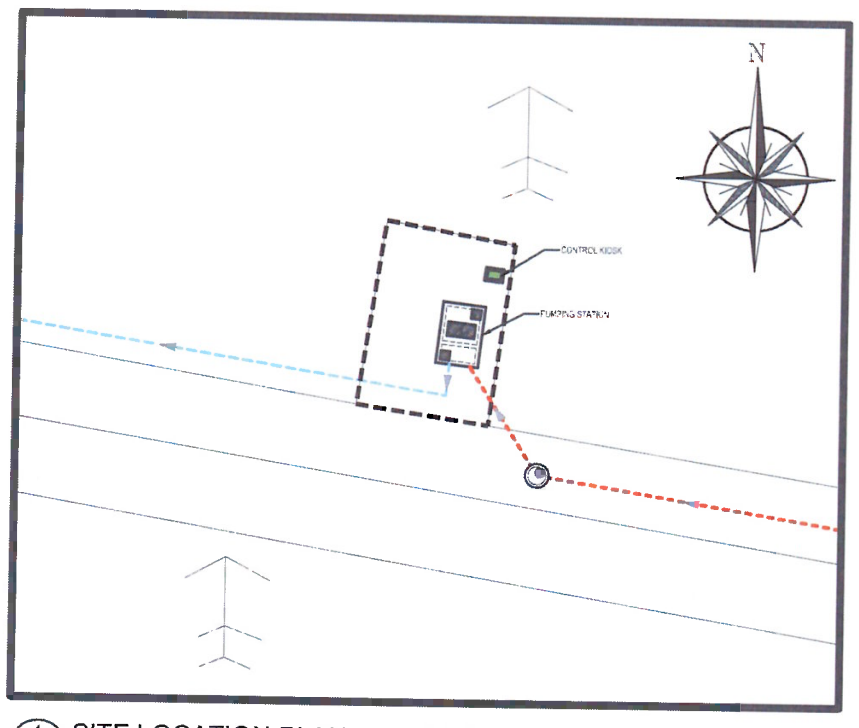
SCALES	DRAWN	CHECKED	APPROVED
1:500 @ A3	D.Rimdzius	F.Lane	N.Delaney
	DATE 02-09-13	DATE 02-09-13	DATE 02-09-13

DRAWING No 20391-AA-01 REV -



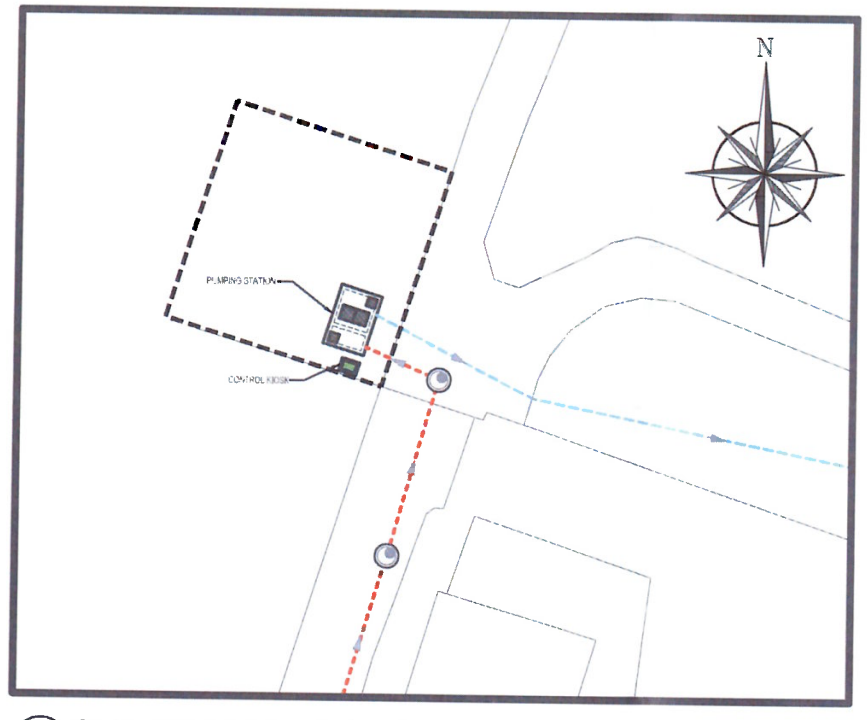
SITE LOCATION MAP

SCALE 1:10,000



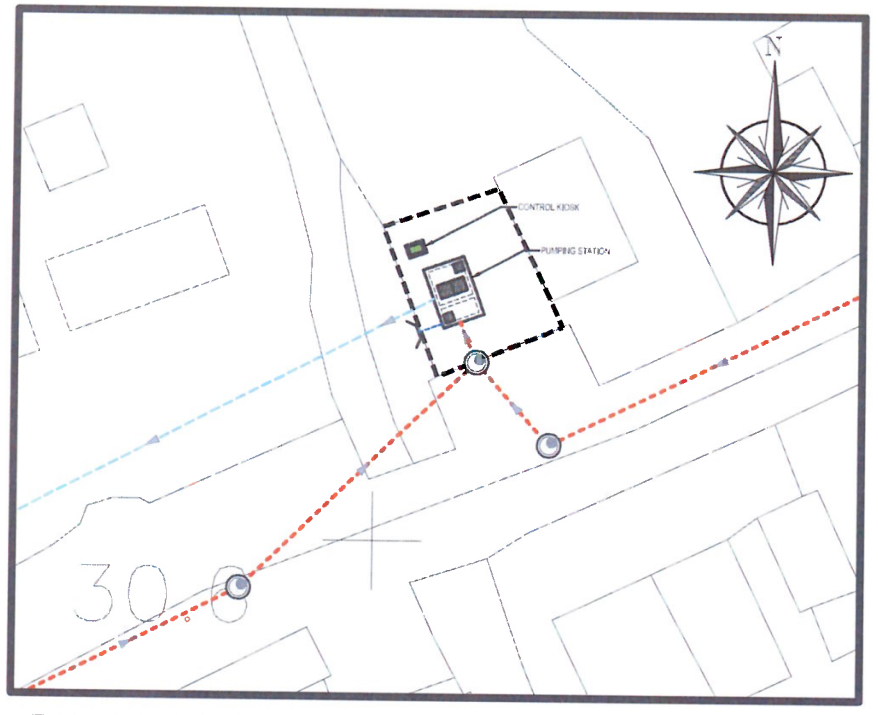
1 SITE LOCATION PLAN - AIRPORT P.S.

SCALE 1:500



2 SITE LOCATION PLAN - CARAVAN PARK P.S.

SCALE 1:500



3 SITE LOCATION PLAN - BRIDGE P.S.

SCALE 1:500

NOTES

LEGEND

- EXISTING TREATMENT WORKS SITE
- EXISTING FOUL SEWER
- EXISTING (FOUL) RISING MAIN
- EXISTING PUMP STATION
- EXISTING (FOUL) RISING MAIN
- EXISTING SITE BOUNDARY
- OVERFLOW

REV.	DATE	DESCRIPTION	D	C	A

PRELIMINARY

COPYRIGHT RESERVED - THIS DRAWING IS NOT TO BE USED FOR A PURPOSE OTHER THAN THAT FOR WHICH IT HAS BEEN ISSUED BY NICHOLAS O'DWYER LTD. NOR IS IT TO BE COPIED OR REPRODUCED IN ANY MANNER WITHOUT WRITTEN CONSENT

Nicholas O'Dwyer
CONSULTING ENGINEERS
Hartnett House, Office Park, Nutgrove Avenue, Dublin 14
Tel 01-296 9000 Fax 01-296 9001 E-mail dublin@nodwyer.com

CLIENT

Sligo County Council
Comhairle Chontae Shligigh
County Hall,
Riverside, Co Sligo
Tel (071) 9156666 Fax (071) 9141119

PROJECT

TUBBERCURRY,
GRANGE & STRANDHILL
DBO BUNDLE

TITLE

STRANDHILL
PUMPING STATION SITES
LOCATION PLAN

SCALES	DRAWN	CHECKED	APPROVED
1:500 @ A3 1:10,000 @A3	D.Smithers	C.Sheehan	N.Delaney
	DATE 20.08.13	DATE 20.08.13	DATE 20.08.13

DRAWING No 20391-AA-03

REV -

APPENDIX III: PROVISIONAL SCREENING EXERCISE

Table III.1 Special Areas of Conservation within 20 km of the Proposed Works

Site Name & Code	Annex I species	Annex II Habitat	Threats to Site Integrity	Distance	Potential Impact	Justification
Ben Bulben, Gleniff and Glenade Complex (000623)	Geyer's whorl snail (Vertigo geyeri) Otter (*Lutra lutra*)	[3260]Water courses of plain to montane levels with the *Ranunculion fluitantis* and *Callitricho-Batrachion* vegetation [4030]European dry heaths [4060]Alpine and Boreal heaths [5130]*Juniperus communis* formations on heaths or calcareous grasslands [7220]Petrifying springs with tufa formation (Cratoneurion) [8120] Calcareous and calcshist screes of the montane to alpine levels (*Thlaspietea rotundifolii)* [8210]Calcareous rocky slopes with chasmophytic vegetation	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; Burning.	11.17 km	No impact	There is no route for the proposed works to impact on this SAC
Cummeen Strand/Drumcliff Bay (000627)	Narrow-mouthed whorl snail (*Vertigo angustior*) Common Seal (*Phoca vitulina*)	[1130] Estuaries [1140] Mudflats and sandflats not covered by seawater at low tide [2110] Embryonic shifting dunes [2120] Shifting dunes along the shoreline with Ammophila arenaria (white dunes) [2130] Fixed coastal dunes with herbaceous vegetation (grey dunes) [7220] Petrifying springs with tufa formation (Cratoneurion) [5130] *Juniperus communis*	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;	0 metres	Potential for impact	Given the proximity of the proposed works to the SAC and in line with the precautionary principle further assessment is required.

Site Name & Code	Annex I Species	Annex II Habitat	Threats to Site Integrity	Distance	Potential Impact	Justification
		formations on heaths or calcareous grasslands	Introduction of alien invasive species; Illegal Dumping; Burning; Quarrying/removal of sand; Aquaculture.			
Lough Gill (001976)	Sea Lamprey (*Petromyzon marinus*) River Lamprey (*Lampetra fluviatilis*) Brook Lamprey (*Lampetra planeri*) White -clawed Crayfish (*Austropotamobius pallipes*) Atlantic Salmon (*Salmo salar*) European Otter (*Lutra lutra*)	[3150] Natural eutrophic lakes with Magnopotamion or Hydrocharitiontype vegetation [91e0] Alluvial forests with *Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae*) [91a0] Old sessile oak woods with Ilex and Blechnum in British Isles	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(WwTW); Recreation/amenity use; Developments – marinas; Introduction of alien invasive species; Illegal Dumping; Crayfish Fishing.	8.61 km	No impact	There is no route for the proposed works to impact on this SAC.
Ballysadare Bay (000622)	Narrow-mouthed whorl snail (*Vertigo angustior)* Common Seal (*Phoca vitulina)*	[1130] Estuaries [1140] Mudflats and sandflats not covered by seawater at low tide [2110] Embryonic shifting dunes [2120] Shifting dunes along the shoreline with *Ammophila arenaria* (white dunes) [2130] Fixed coastal dunes with herbaceous vegetation (grey dunes) [2190] Humid dune slacks	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;	1.4 km	Potential for impact	Given the proximity of the proposed works to the SAC and in line with the precautionary principle further assessment is required.

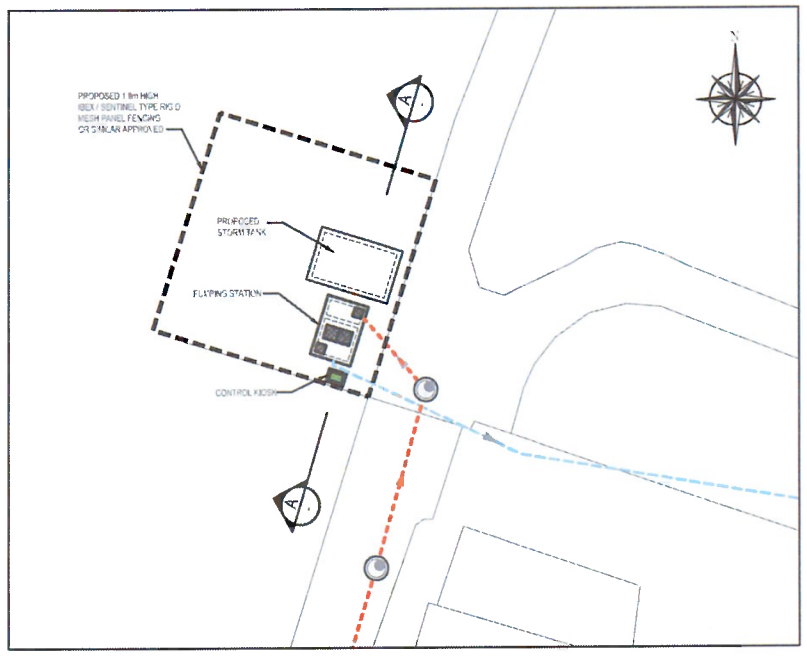
Site Name & Code	Annex I Species	Annex II Habitat	Threats to Site Integrity	Distance	Potential Impact	Justification
			Introduction of alien invasive species; Illegal Dumping; Burning; Quarrying/removal of sand; Aquaculture.			
Knockalongy and Knockachree Cliffs (001669)	Killarney fern (*Trichomanes speciosum*)	[3110] Oligotrophic waters containing very few minerals of sandy plains (*Littorelletalia uniflorae*) [4010]Northern Atlantic wet heaths with *Erica tetralix* [7130]Blanket bog (*active only) [8210]Calcareous rocky slopes with chasmophytic vegetation [8220]Siliceous rocky slopes with chasmophytic vegetation	Pollution and acidification of the watercourses and lakes; 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.	11.44 km	No impact	There is no route for the proposed works to impact on this SAC
Unshin River (001898)	Atlantic Salmon (*Salmo salar)* European Otter (*Lutra lutra)*	[3260] Water courses of plain to montane levels with the Ranunculion fluitantis and *Callitricho-Batrachion* vegetation [91E0] Alluvial forests with *Alnus glutinosa and Fraxinus excelsior* (*Alno-Padion, Alnion incanae, Salicion albae*)	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(WwTW); Recreation/amenity use; Developments –marinas; Introduction of alien invasive species;	9.48 km	No impact	There is no route for the proposed works to impact on this SAC

Site Name & Code	Annex I Species	Annex II Habitat	Threats to Site Integrity	Distance	Potential Impact	Justification
			Illegal Dumping.			
Union Wood (000638)		[91A0] Old sessile oak woods with Ilex and Blechnum in British Isles	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.	11.08 km	No impact	There is no route for the proposed works to impact on this SAC
Ox Mountains Bogs (002006)	Geyer's Whorl Snail *(Vertigo geyeri)*	[7130] Blanket bog (*active only) [4010] Northern Atlantic wet heaths with *Erica tetralix* [3160] Natural dystrophic lakes and ponds [3110] Oligotrophic waters containing very few minerals of sandy plains (*Littorelletalia uniflorae)* [7150] Depressions on peat substrates of the Rhynchosporion	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.	14.17 km	No impact	There is no route for the proposed works to impact on this SAC

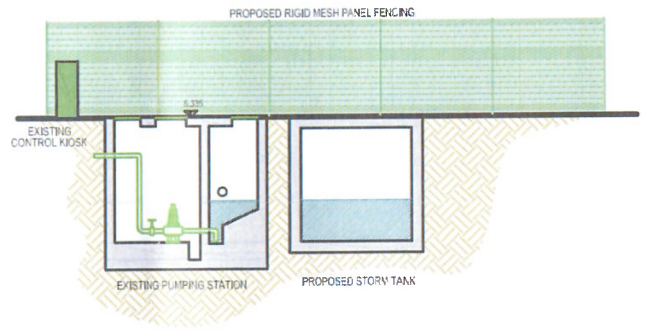
Table III.2 Special Protection Areas within 20 km of the Proposed Works

Site Name & Code	Conservation Interests	Threats to Site Integrity	Distance	Potential Impact	Justification
Sligo/Leitrim Uplands (004187)	Peregrine (*Falco peregrinus*) Chough (*Pyrrhocorax pyrrhocorax)*	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.	11.13 km	No impact	There is no route for the proposed works to impact on this SPA.
Ballintemple and Ballygilgan (004234)	Barnacle Goose (*Branta leucopsis)*	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.	6.73 km	No impact	There is no route for the proposed works to impact on this SPA.
Ardboline Island and Horse Island (004135)	Cormorant (*Phalacrocorax carbo)* Barnacle Goose (*Branta leucopsis)* Additional Special Conservation Interests: Corncrake (*Crex crex*)	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.	8.02 km	No impact	Due to the distance of the scheme from the site and the high dilution capacity of Donegal Bay will be no significant impact on this site.
Drumcliff Bay (004013)	Barnacle Goose (*Branta leucopsis)* Sanderling (*Calidris alba*) Additional Special Conservation Interests: Wetland & Water birds	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.	4.9km	No impact	Due to the distance of the scheme from the site and the high dilution capacity of Sligo Bay there will be no significant impact on this site.
Cummeen Strand (004035)	Light-bellied Brent Goose (*Branta bernicla hrota)* Additional Special Conservation Interests:	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;	~300m	Potential for impact	Given the proximity of the proposed works to the SAC and in line with the precautionary principle

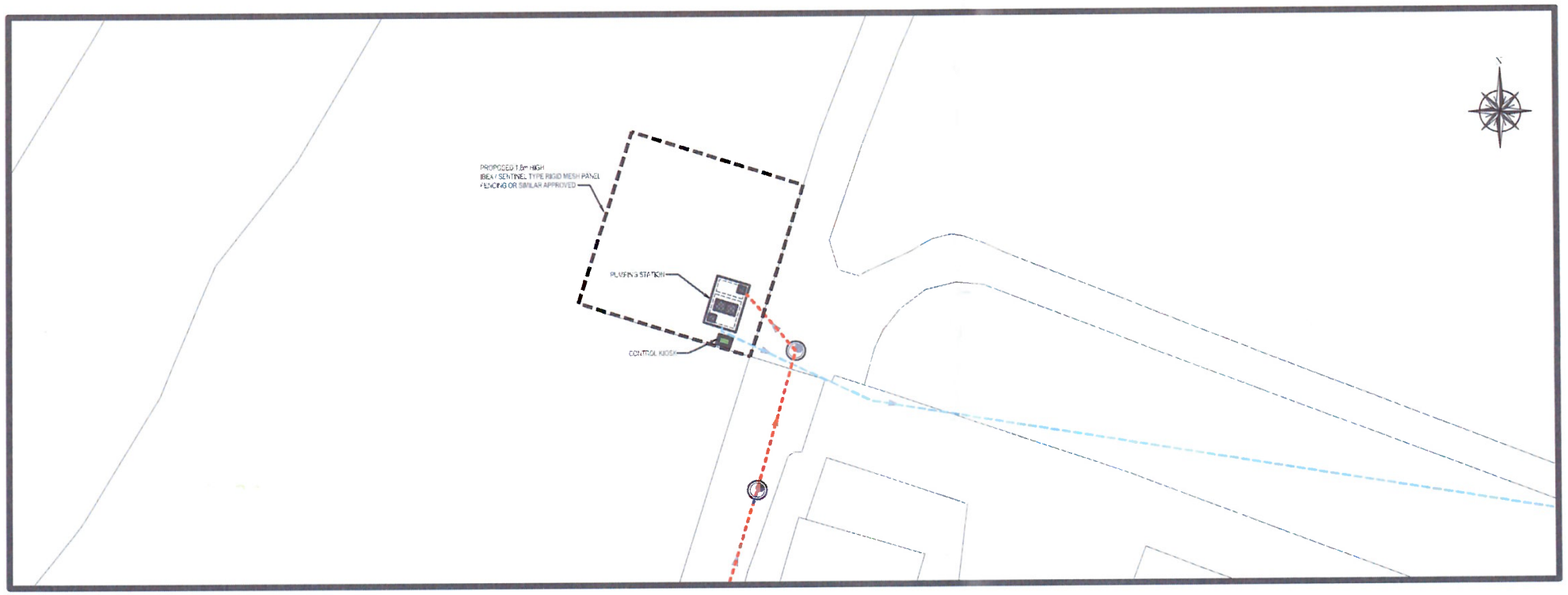
Site Name & Code	Conservation Interests	Threats to Site Integrity	Distance	Potential Impact	Justification
	Oystercatcher (*Haematopus ostralegus*) Redshank (*Tringa totanus*) Wetland & Water birds	Disturbance including recreation/amenity use; Introduction of alien invasive species; Illegal Dumping; Disturbance from Recreational/amenity use; Inappropriate land management.			further assessment is required.
Aughris Head (004133)	Kittiwake (*Rissa tridactyla*)	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.	10.42 km	No impact	There is no route for the proposed works to impact on this SPA.
Ballysadare Bay (004129)	Light-bellied Brent Goose (*Branta bernicla hrota*) Bar-tailed Godwit (*Limosa lapponica*) Additional Special Conservation Interests: Grey Plover (*Pluvialis squatarola*) Dunlin (*Calidris alpina*) Redshank (*Tringa totanus*) Wetland & Water birds	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.	1.4 km	Potential for impact	Given the proximity of the proposed works to the SAC and in line with the precautionary principle further assessment is required.



- PROPOSED INDICATIVE SITE LAYOUT PLAN
SCALE 1:500



A - PROPOSED INDICATIVE SITE LAYOUT PLAN SECTION
SCALE 1:200



- EXISTING SITE LAYOUT PLAN
SCALE 1:500

NOTES

LEGEND

EXISTING FOUL SEWER

EXISTING (FOUL) RISING MAIN

EXISTING (FOUL) RISING MAIN

EXISTING SITE BOUNDARY

REV	DATE	DESCRIPTION
D		
C		
A		

PRELIMINARY

COPYRIGHT RESERVED - THIS DRAWING IS NOT TO BE USED FOR A PURPOSE OTHER THAN THAT FOR WHICH IT HAS BEEN ISSUED BY NICHOLAS O'DWYER LTD. NOR IS IT TO BE COPIED OR REPRODUCED IN ANY MANNER WITHOUT WRITTEN CONSENT

Nicholas O'Dwyer
CONSULTING ENGINEERS
Nutgrove Office Park, Nutgrove Avenue, Dublin 14
Tel: 01-296 9000 Fax: 01-296 9001 E-mail: nodwyer@nicholasodwyer.com

CLIENT

Sligo County Council
Comhairle Chontae Shligigh
County Hall,
Riverside, Co. Sligo
Tel: (071) 9156666 Fax: (071) 9141119

PROJECT

TUBBERCURRY,
GRANGE & STRANDHILL
DBO BUNDLE

TITLE

STRANDHILL
EXISTING & PROPOSED CARAVAN
PARK SITE LAYOUT PLAN

SCALES	DRAWN	CHECKED	APPROVED
1:200 @ A3 1:500 @A3	D.Smithers	C.Sheehan	N.Delaney
	DATE 20.08.13	DATE 20.08.13	DATE 20.08.13

DRAWING No. 20391-AA-04

REV -

SAC Corrections Map Viewer

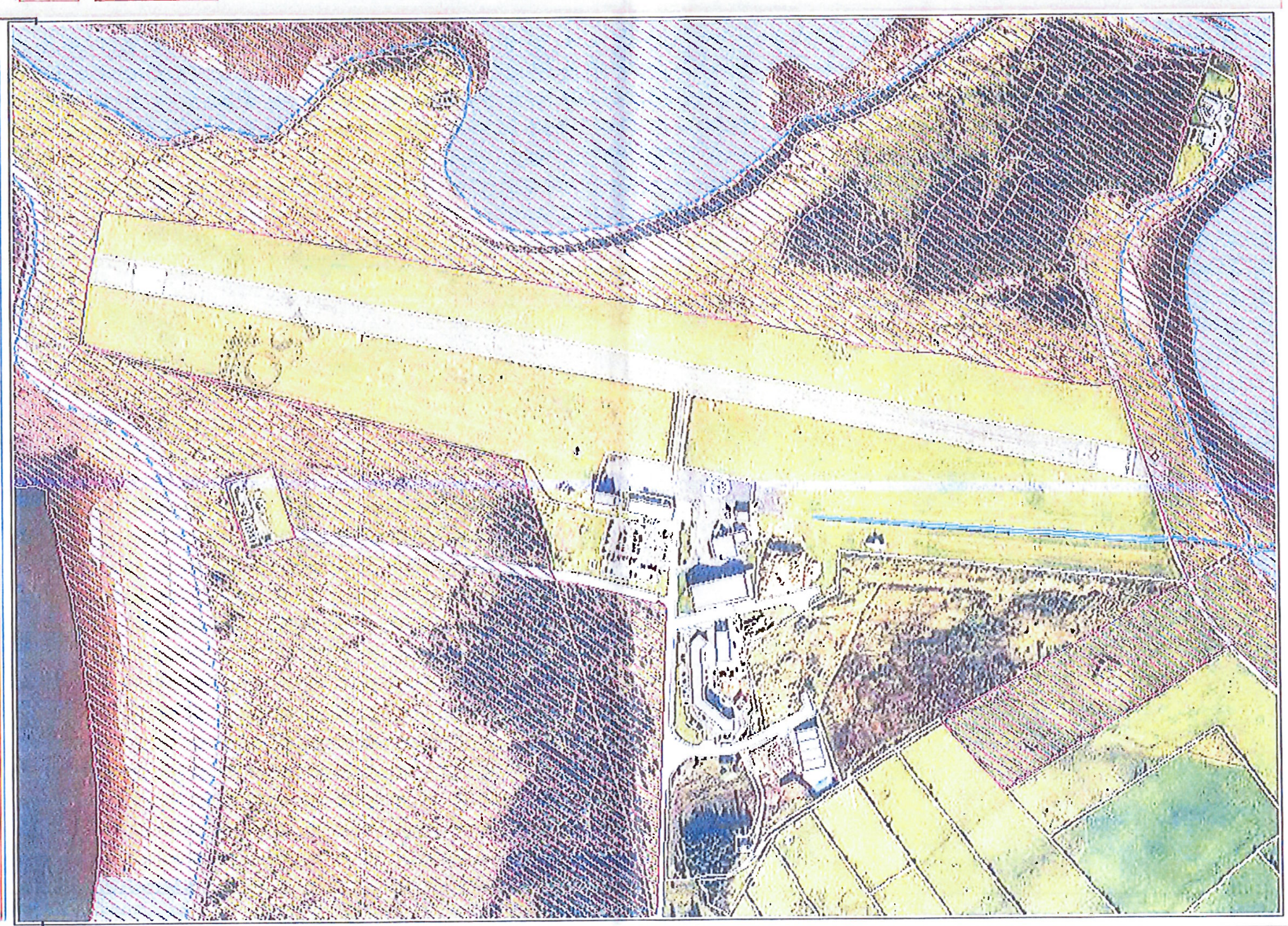
Logged in as nlockhart Logout

000627 | Search | Toggle Dual Maps | Anomaly Identify | Measure

IG Map Contents

ITM Map Contents

- PAI/SACCorrectio
  - MarkUp Points
    - Done
    - Done
    - Done
    - Done
    - Done
    - Done
    - Done but Please Ch
    - Need More Info
    - Not Done
    - Not yet Checked by
    - Not yet Checked by
    - Not yet Checked by
    - Not yet Checked by
    - Checked by Ecols -
    - Checked by Ecols -
    - Checked by Ecols -
    - Checked by Ecols -
    - Checked by Ecols -
    - Checked by Ecols -
    - Checked by Ecols -



APPENDIX IV: CORRESPONDENCE

An Roinn
Ealaíon, Oidhreachta agus Gaeltachta
Department of
Arts, Heritage and the Gaeltacht

Mr. Frank Moylan,
Acting Senior Planner
Planning Office,
Sligo County Council,
County Hall,
Riverside,
Sligo.

20th June 2013

Re: Mapping issues relating to Cummeen Strand/Drumcliff Bay candidate Special Area of Conservation (cSAC) (Site Code: 000627)

Dear Mr. Moylan,

I refer to recent communications between Sligo County Council and Regional Management of the National Parks and Wildlife Service regarding the boundary of Cummeen Strand/Drumcliff Bay candidate Special Area of Conservation (cSAC) in the vicinity of Sligo Airport.

I wish to confirm that the boundary of the site has been reviewed internally as part of a project to transfer the boundary of all cSAC sites to a 1:5000 mapping base and address any relevant digitising errors. I have attached a map of the revised boundary of Cummeen Strand/Drumcliff Bay cSAC in the vicinity of Sligo Airport.

It should be noted that the revised boundary has not been publicised and it is not intended to publicise the revised boundaries resulting from this project until such time as the cSAC sites are assigned statutory instruments.

However, for the purpose of carrying out assessments on potential impacts of plans or projects on the cSAC I wish to confirm that it is acceptable to use the attached revised boundary.

I trust this clarified the issues relating to the boundary.

Yours sincerely,

Francis Donohoe

Francis Donohoe
Assistant Principal
National Parks & Wildlife Service

CC: Siobhán Ryan, Heritage Officer, Sligo County Council,
Declan Cawley, Acting Senior Executive Engineer, Water Services, Sligo County Council,

APPENDIX V: SITE SYNOPSES & NATURA 2000 STANDARD DATA FORMS

SITE SYNOPSIS

SITE NAME: CUMMEEN STRAND/DRUMCLIFF BAY (SLIGO BAY)

SITE CODE: 000627

This large coastal site extends from Cullamore in the north-west to Killaspug in the south-west, and from Sligo town in the south-east to Drumcliff village in the north-east. It encompasses two large, shallow bays (Drumcliff Bay and Sligo Harbour), Ardboline and Horse Islands, sand dunes and sand hills at Rosses Point, Killaspug, Yellow Strand and Coney Island, grassland at Ballintemple and Ballygilgan (Lissadell) and a variety of other habitats (woodland, salt marsh, sandy beaches, boulder beaches, shingle, fen, freshwater marshes, rocky sea cliffs, lakes). The site is largely underlain by Carboniferous limestone, but acidic rocks are also found on the Rosses Point peninsula. At Serpent Rock in the north-western section of the site the most complete section of the north-western Carboniferous strata is exposed. Here are found an excellent series of fossilised corals which, in some strata, stand out from the rock matrix.

The dominant habitats on the site are estuaries and intertidal sand and mud flats. Sligo Harbour receives the waters of the Garavogue River, which flows from Lough Gill, while Drumcliff Bay receives the Drumcliff River which flows from Glencar Lough. At low tide extensive areas of intertidal flats are exposed in both of these sheltered estuarine bays. The intertidal flats support a diverse macrofauna, with invertebrate species such as lugworm (*Arenicola marina*), cockles (*Cerastoderma edule*), sand mason (*Lanice conchilega*), Baltic tellin (*Macoma balthica*), spire shell (*Hydrobia ulvae*) and mussels (*Mytilus edulis*) being frequent. Of particular note is the presence of eelgrass (*Zostera noltii* and *Z. angustifolia*) beds in both bays. Both estuaries and intertidal flats are of conservation significance and are listed on Annex I of the EU Habitats Directive. Areas of salt marsh fringe both bays in places.

Sand dunes, sand hills and dune grassland are found at Rosses Point, Killaspug, Yellow Strand and Coney Island. The dominant species of the dune grassland behind Yellow Strand are Sand Sedge (*Carex arenaria*) and Meadow-grass (*Poa pratensis*), with associated species including Lady's Bedstraw (*Galium verum*), Mouse-ear Hawkweed (*Hieracium pilosella*), Common Milkwort (*Polygala vulgaris*), Common Dog-violet (*Viola riviniana*), Mountain Everlasting (*Antennaria dioica*), Common Spotted-orchid (*Dactylorhiza fuchsii*), Early Marsh-orchid (*D. incarnata*), Frog Orchid (*Coeloglossum viride*) and Autumn Lady's-tresses (*Spiranthes spiralis*). Embryonic dunes, with characteristic species, including Sand Couch (*Elymus farctus*), occur at the southern end of the sand spit at Rosses Point. Sand dune habitats are rare and threatened in Europe and three types found on the site, embryonic dunes, Marram (*Ammophila arenaria*) dunes and fixed dunes, are listed on Annex I of the E.U. Habitats Directive, the last-named with priority status.

Wetlands on the site include Doonweelin Lake, a freshwater lake on the Rosses Point peninsula, which supports interesting vegetation communities that reflect the

SITE SYNOPSIS

SITE NAME: CUMMEEN STRAND SPA

SITE CODE : 004035

Cummeen Strand is a large shallow bay stretching from Sligo town westwards to Coney Island. It is one of three estuarine bays within Sligo Bay, with Drumcliff Bay to the north and Ballysadare Bay to the south. The Garavogue River flows into the bay and forms a permanent channel.

At low tide, extensive sand and mud flats are exposed. These support a diverse macro-invertebrate fauna which provide the main food supply for the wintering waterfowl. Invertebrate species such as lugworm (*Arenicola marina*), ragworm (*Hediste diversicolor*), cockles (*Cerastoderma edule*), sand mason (*Lanice conchilega*), Baltic tellin (*Macoma balthica*), spire shell (*Hydrobia ulvae*) and mussels (*Mytilus edulis*) are frequent. Of particular note is the presence of eelgrass (*Zostera noltii* and *Z. angustifolia*) beds, which provide a valuable food stock for herbivorous wildfowl. The estuarine and intertidal flat habitats are of conservation significance and are listed on Annex I of the EU Habitats Directive. Areas of salt marsh fringe the bay in places and provide roosting sites for birds during the high tide periods. There are sand dunes at Killaspug Point and Coney Island, with a shingle spit at Standalone Point near Sligo town.

Cummeen Strand is of ornithological importance as it supports important concentrations of wintering waterfowl. The site supports an Internationally Important flock of Brent Geese (peak of 232 individuals in the winter of 1999/00, with the mean of peak monthly counts in the period 1996/99 (except 1998) being 228, peaking at 309) and Nationally Important populations of a further two species – Oystercatcher 891 and Redshank 501 (all figures are average peaks for the period). Other species which occurred in significant numbers included Shelduck 80, Wigeon 178, Teal 70, Mallard 170, Red-breasted Merganser 17, Golden Plover 567, Lapwing 734, Knot 18, Sanderling 18, Dunlin 601, Bar-tailed Godwit 57, Curlew 546, Greenshank 18 and Turnstone 80. Whooper Swans also occurred (9), though they are not regular visitors. The presence of Golden Plover, Bar-tailed Godwit and Whooper Swan is of particular note as these species are listed on Annex I of the EU Birds Directive.

This site is of high ornithological importance, with one species having a population of International Importance and two having populations of National Importance. In addition, there are three species that are listed on Annex I of the Birds Directive. The site is also important as a component of the much larger Sligo Bay complex.

28.02.2002

SITE SYNOPSIS

SITE NAME : BALLYSADARE BAY

SITE CODE : 000622

Ballysadare Bay extends for about 10km westwards from the town of Ballysadare, County Sligo and is the most southerly of three inlets of the larger Sligo Bay. The estuarine channel of the Ballysadare River winds its way through the Bay, finally reaching the open sea near the spit at Strandhill Dunes. 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. Knocknarea Mountain overlooks the site.

The bay contains extensive intertidal sand and mudflats, approximately 1,500ha in extent. The mud provides an abundance of food for wildfowl, in the form of colonising plants such as Eel Grass (*Zostera marina*) and Tasselweed (*Ruppia maritima*), as well as numerous species of invertebrates on which both wildfowl and waders feed. Well-developed saltmarshes occur at several locations around the bay. Typical species of these areas are Sea Rush (*Juncus maritimus*), Saltmarsh Rush (*Juncus gerardi*), Creeping Bent (*Agrostis stolonifera*) and Parsley Water-dropwort (*Oenanthe lachenalii*). In hollows and ditches, Sea Arrow Grass (*Triglochin maritima*), Sea Club Rush (*Scirpus maritimus*), Sea Milkwort (*Glaux maritima*), Thrift (*Armeria maritima*), Sea Plantain (*Plantago maritima*), Sea Aster (*Aster tripolium*) and Red Fescue (*Festuca rubra*) occur. Particularly interesting species found on the saltmarshes are Flowering Rush (*Butomus umbellatus*), Slender Spike-rush (*Eleocharis uniglumis*) and Hard Grass (*Parapholis strigosa*).

There is a large sand dune system at Strandhill which has been relatively undisturbed by grazers. The dune system is highly dynamic, with the tip of the peninsula actively growing and displaying a good, though limited, example of embryonic shifting dunes. The characteristic species found in this habitat type include Couch Grass (*Elymus farctus*), Spear-leaved Orache (*Atriplex prostratus*) and Sea Rocket (*Cakile maritima*). Shifting marram dunes are fairly extensive in area, occurring along the entire seaward side of the spit and are especially active towards the tip. While Marram (*Ammophila arenaria*) is the dominant species, Colt's Foot (*Tussilago farfara*), Red Goosefoot (*Chenopodium rubrum*) and Cat's-ear (*Hypochoeris radicata*) can also be found. The seaward dunes reach considerable heights (up to 20m). They are very steep on the seaward edge, but to the east of this there is an undulating expanse of dune hills. The largest proportion of the dune system is made up of fixed dunes, a priority habitat listed on Annex I of the EU Habitats Directive. In from the marram dunes, there is a low-growing, closed sward which is particularly species rich, with Field Wood-rush (*Luzula campestris*), Kidney Vetch (*Anthyllis vulneraria*), Bee Orchid (*Ophrys apifera*), Oxeye Daisy (*Leucanthemum vulgare*), Common Centuary (*Centaurium erythraea*), Thyme (*Thymus praecox*), Harebell (*Campanula rotundifolia*), Burnet Rose (*Rosa pimpinellifolia*), Carline Thistle (*Carlina vulgaris*) and Fairy Flax (*Linum catharticum*). The fixed dune areas are also rich in brophytes and lichens. Moss

species include *Tortula ruraliformis, Homalothecium lutescens, Ditrichum flexicaule and Hypnum cupressiforme,* while lichens (*Peltigera* spp. and *Cladonia* spp.) are also present. Some humid dune slacks occur amongst the fixed dunes. Characteristic species include Creeping Willow (*Salix repens*), Carnation Sedge (*Carex panicea*), Marsh Helleborine (*Epipactis palustris*) and Jointed Rush (*Juncus articulatus*).

A range of habitats fringe the Bay, adding diversity. Some of these areas have particular features of interest, e.g. the old oyster farm at Tanrego is important for waterfowl, while the uncommon plant species, Ivy Broom (*Orobanche hederae*), occurs in scrubland adjacent to the bay.

Ballysadare Bay is important for a range of waterfowl species in autumn and winter and is part of the larger Sligo Bay complex. Brent Geese occur in internationally important numbers while a further seven species have populations of national importance. These are as follows, with numbers referring to the average peaks over winters 1994/95 - 1997/98: Brent Goose (259), Red-breasted Merganser (48), Oystercatcher (796), Grey Plover (231), Dunlin (1129), Bar-tailed Godwit (431), Redshank (481) and Greenshank (24). The presence of Bar-tailed Godwit and also smaller numbers of Golden Plover (66) is of particular note as these species are listed on Annex I of the EU Birds Directive.

Two animals listed on Annex II of the EU Habitats Directive occur within the site: the Bay supports a colony of Common Seals, with up to 170 adults recorded here at one time; and the rare snail, *Vertigo angustior*, occurs in dune slacks or hollows at Strandhill.

The Bay is little used for fishing or boating, but marsh shooting is common in the upper reaches of the Bay. Aquaculture is little developed in this bay compared to nearby Sligo and Drumcliff Bays. Dune systems are sensitive to developments which alter their structure. Grazing is also a critical factor: the correct level of grazing maintains an open, species-rich sward, but the presence of too many grazers causes damage to the vegetation and may exacerbate dune erosion. Agricultural improvement, and particularly the application of fertilisers, threatens dune vegetation, leading to the eventual loss of species diversity.

Ballysadare Bay is of ecological value for its range of good quality coastal habitats. Actively developing dune systems are rare on the west coast and the sand dune system at Strandhill is of particular interest as a large and intact example of a habitat type which is under general threat from development. The rarity of intact dune systems is recognised in the listing of "Fixed Dunes" as priority habitat on Annex I of the EU Habitats Directive. The saltmarshes at Ballysadare Bay are relatively good examples for the west coast and that at Abbeytown is unusual as it is forming on quarry waste. The presence of two Annex II species within the site adds further importance. Furthermore, the bay supports nationally important numbers of waterfowl.

15.10.2001

SITE SYNOPSIS

SITE NAME: BALLYSADARE BAY SPA

SITE CODE: 004129

Ballysadare Bay extends for about 10km westwards from the town of Ballysadare, County Sligo and is the most southerly of three inlets of the larger Sligo Bay complex. The estuarine channel of the Ballysadare River winds its way through the bay, finally reaching the open sea near the spit at Strandhill Dunes. 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 bay contains extensive intertidal sand and mudflats. The flats support good populations of macro-invertebrates which are important food items for wintering waterfowl. Common species include the polychaete worms *Hediste diversicolor, Arenicola marina, Lanice conchilega* and *Nepthys hombergii*, and the bivalves *Cerastoderma edule, Macoma balthica* and *Scrobicularia plana*. Also present on the intertidal flats are the vascular plants Eelgrass (*Zostera marina*) and Beaked Tasselweed (*Ruppia maritima*), which provide food for herbivorous wildfowl.

Well-developed salt marshes, which provide roosting sites for birds at high tide, occur at several locations around the bay. Typical species of these areas are Sea Rush (*Juncus maritimus*), Saltmarsh Rush (*J. gerardi*), Sea Arrowgrass (*Triglochin maritima*), Sea Milkwort (*Glaux maritima*) and Red Fescue (*Festuca rubra*). There is a large sand dune system at Strandhill. The dune system is highly dynamic, with the tip of the peninsula actively growing and displaying a good, though limited, example of embryonic shifting dunes. The sandy beaches around the peninsula are used by roosting birds.

The site is a Special Protection Area (SPA) under the E.U. Birds Directive, of special conservation interest for the following species: Light-bellied Brent Goose, Grey Plover, Dunlin, Bar-tailed Godwit and Redshank. The E.U. Birds Directive pays particular attention to wetlands and, as these form part of this SPA, the site and its associated waterbirds are of special conservation interest for Wetlands & Waterbirds.

Ballysadare Bay is important for a range of waterfowl species in autumn and winter. Counts over four winters in the period 1995/96 to 1999/00 showed that the population of Light-bellied Brent Goose (188) meets the qualifying level for international importance. The populations of five other species are of national importance, i.e. Grey Plover (70), Dunlin (1,420), Bar-tailed Godwit (251), Redshank (435) and Greenshank (22) - figures are the average peaks. A range of other species occur in regionally important concentrations - these include Cormorant (43), Shelduck (55), Wigeon (617), Teal (179), Mallard (304), Red-breasted Merganser (26), Oystercatcher (516), Ringed Plover (96), Golden Plover (301), Lapwing (467), Curlew (508) and Turnstone (40). It also supports populations of Goldeneye (17), Black-headed Gull (261) and Common Gull (174). A small flock of Whooper Swan (15) occurs.

A colony of Common Seals, a species listed on Annex II of the E.U. Habitats Directive occur within the site, with up to 170 adults recorded here at one time.

The bay is little used for fishing or boating, but marsh shooting is common in its upper reaches. Aquaculture is little developed here compared to nearby Sligo Harbour and Drumcliff Bay. The wintering bird populations are monitored annually as part of I-WeBS.

Ballysadare Bay SPA is of high ornithological importance; it supports a Light-bellied Brent Goose population of international importance as well as nationally important populations of five other species of wintering waterfowl. The presence of Bar-tailed Godwit, Golden Plover and Whooper Swan is of particular note as these species are listed on Annex I of the E.U. Birds Directive. The site forms an important component of the larger Sligo Bay complex.

2.10.2007

9110

NATURA 2000

STANDARD DATA FORM

FOR SPECIAL PROTECTION AREAS (SPA)

FOR SITES ELIGIBLE FOR IDENTIFICATION AS SITES OF COMMUNITY IMPORTANCE (SCI)

AND

FOR SPECIAL AREAS OF CONSERVATION (SAC)

1. SITE IDENTIFICATION

1.1. TYPE	*1.2. SITE CODE*	*1.3. COMPILATION DATE*	*1.4. UPDATE*
F	IE0000627	199912	

1.5. RELATION WITH OTHER NATURA 2000 SITES:

NATURA 2000 SITE CODES

IE0001994
IE0002251

1.6. RESPONDENT(S):

National Parks & Wildlife Service of the Department of the Environment, Heritage and Local Government. 7 Ely Place, Dublin 2, Ireland.

1.7. SITE NAME:

Cummeen Strand/Drumcliff Bay (Sligo Bay)

1.8. SITE INDICATION AND DESIGNATION/CLASSIFICATION DATES:

DATE SITE PROPOSED AS ELIGIBLE AS SCI:	*DATE CONFIRMED AS SCI:*
199912	
DATE SITE CLASSIFIED AS SPA:	*DATE SITE DESIGNATED AS SAC:*

2. SITE LOCATION

2.1. SITE CENTRE LOCATION

LONGITUDE	LATITUDE
W 8 31 48	54 19 21

W/E (Greenwich)

2.2. AREA (HA):

4919.12

2.3. SITE LENGTH (KM):

2.4. ALTITUDE (M):

MINIMUM	MAXIMUM	MEAN
0	33	5

2.5. ADMINISTRATIVE REGION:

NUTS CODE	REGION NAME	% COVER
IE011	Border	20
Marine area not covered by a NUTS-region		8

2.6. BIOGEOGRAPHIC REGION:

Alpine	Atlantic	Boreal	Continental	Macaronesian	Mediterranean
☐	☑	☐	☐	☐	☐

3. ECOLOGICAL INFORMATION

3.1. HABITAT types present on the site and assessment for them:

ANNEX I HABITAT TYPES:

CODE	%COVER	REPRESENTATIVITY	RELATIVE SURFACE	CONSERVATION STATUS	GLOBAL ASSESSMENT
1140	46	A	A	B	A
1130	14	A	B	B	A
5130	1	C	C	C	C
7220	1	B	C	B	B
2110	1	B	C	B	B
2130	1	C	C	C	C
2120	1	C	C	C	C

3.2. SPECIES

covered by Article 4 of Directive 79/409/EEC

and

listed in Annex II of Directive 92/43/EEC

and

site assessment for them

3.2.a. BIRDS listed on Annex I of Council directive 79/409/EEC

CODE	NAME	POPULATION				SITE ASSESSMENT			
		Resident	Migratory			Population	Conservation	Isolation	
			Breed	Winter	Stage				
A045	Branta leucopsis			2000 i		A	A	C	
A140	Pluvialis apricaria			419 i		C	B	C	
A157	Limosa lapponica			327 i		C	A	C	
A346	Pyrrhocorax pyrrhocorax	1 p				C	B	C	

3.2.b. Regularly occuring Migratory Birds not listed on Annex I of Council directive 79/409/EEC

CODE	NAME	POPULATION				SITE ASSESSMENT			
		Resident	Migratory			Population	Conservation	Isolation	
			Breed	Winter	Stage				
A009	Fulmarus glacialis		30+ p			C	C	C	
A017	Phalacrocorax carbo		261 p			B	A	C	
A046	Branta bernicla			395 i		C	A	C	
A048	Tadorna tadorna			120 i		C	A	C	
A050	Anas penelope			750 i		C	A	C	
A052	Anas crecca			250 i		C	B	C	
A053	Anas platyrhynchos			200 i		C	B	C	
A070	Mergus merganser			48 i		C	A	C	
A130	Haematopus ostralegus			906 i		C	A	C	
A137	Charadrius hiaticula			118 i		C	A	C	
A141	Pluvialis squatarola			77 i		C	A	C	
A142	Vanellus vanellus			1238 i		C	B	C	
A149	Calidris alpina			1405 i		C	A	C	
A160	Numenius arquata			750 i		C	B	C	
A162	Tringa totanus			562 i		B	A	C	
A164	Tringa nebularia			18 i		B	A	C	

3.2.c. MAMMALS listed on Annex II of Council directive 92/43/EEC

CODE	NAME	POPULATION				SITE ASSESSMENT			
		Resident	Migratory			Population	Conservation	Isolation	
			Breed	Winter	Stage				

			Breed	Winter	Stage			
1365	Phoca vitulina	86+ i				B	A	C

3.2.d. AMPHIBIANS and REPTILES listed on Annex II of Council directive 92/43/EEC

3.2.e. FISHES listed on Annex II of Council directive 92/43/EEC

3.2.f. INVERTEBRATES listed on Annex II of Council directive 92/43/EEC

CODE	NAME	POPULATION				SITE ASSESSMENT		
		Resident	Migratory			Population	Conservation	Isolation
			Breed	Winter	Stage			
1014	Vertigo angustior	p				B	B	A

3.2.g. PLANTS listed on Annex II of Council directive 92/43/EEC

3.3. Other Important Species of Flora and Fauna

GROUP							SCIENTIFIC NAME	POPULATION	MOTIVATION			
B	M	A	R	F	I	P						
						P	Draba incana	p	A			
						P	Orobanche hedera	p	A			
B							Cepphus grylle	10 i			C	
B							Somateria mollissma	2 p			C	
		A					Rana temporaria	p	A			
		A					Rana temporaria	p			C	
	M						Lepus timidus hibernicus	p	A			
	M						Lepus timidus hibernicus	p		B		
	M						Lepus timidus hibernicus	p			C	
	M						Meles meles	p	A			
	M						Meles meles	p			C	

(B = Birds, M = Mammals, A = Amphibians, R = Reptiles, F = Fish, I = Invertebrates, P = Plants)

4. SITE DESCRIPTION

4.1. GENERAL SITE CHARACTER:

Habitat classes	% cover
Marine areas, Sea inlets	20
Tidal rivers, Estuaries, Mud flats, Sand flats, Lagoons (including saltwork basins)	60
Salt marshes, Salt pastures, Salt steppes	1
Coastal sand dunes, Sand beaches, Machair	3
Shingle, Sea cliffs, Islets	4
Inland water bodies (Standing water, Running water)	1
Bogs, Marshes, Water fringed vegetation, Fens	1
Heath, Scrub, Maquis and Garrigue, Phygrana	1
Dry grassland, Steppes	2
Humid grassland, Mesophile grassland	1
Improved grassland	3
Broad-leaved deciduous woodland	1
Artificial forest monoculture (e.g. Plantations of poplar or Exotic trees)	1
Other land (including Towns, Villages, Roads, Waste places, Mines, Industrial sites)	1
Total habitat cover	**100 %**

Other site characteristics

This large coastal site is made up largely of two estuarine bays, Sligo Harbour and Drumcliff Bay. These are the estuaries of the Garavoge and Drumcliff rivers respectively. The estuaries are well sheltered and have extensive intertidal sand and mud flats. Coney Island provides the main shelter for Sligo Harbour, while a sandy/grassy spit protrudes from the Rosses peninsula and provides shelter for inner Drumcliff Bay. The site continues to the north-west of Drumcliff Bay to include the shallow marine waters of Brown's Bay. A series of small islands, notably Ardbolin, occur here. Other coastal habitats are represented, including sand dunes, salt marshes, sandy and boulder beaches, and bedrock shoreline. In addition, there is a scattering of dry grassland, wet grassland, swamp vegetation and broad-leaved woodland. Improved grassland is included for the benefit of wintering geese. The site is largely underlain by Carboniferous limestone, but acidic rocks are also found at Rosses Point. An excellent series of fossilised corals occur at Serpent Rock in the north west of the site. The town of Sligo, a substantial urban centre with a regional port, is located along the eastern boundary of the Sligo Harbour section of the site. Agriculture is the dominant landuse in the surrounding catchments.

4.2. QUALITY AND IMPORTANCE:

The estuarine and intertidal sand and mud flat habitats at this site are extensive in area, generally of good quality and show a good diversity of species and biotopes. Zostera spp. occur. These habitats are considered typical for the north-west region. The fixed dunes and shifting Ammophila dunes are small in area and only of moderate quality, though embryonic dunes are well represented. The site has a good example of petrifying springs with tufa formations, with several species of bryophyte typical of the Cratoneurion. The springs occur along seepage zones in clay sea cliffs. The site supports an area of Juniper scrub. The site has a nationally important colony of Phoca vitulina. Site is important for occurrence of the Annex II mollusc Vertigo angustior. A good diversity of waterfowl winter at site, notably internationally important populations of Branta leucopsis and Branta bernicla hrota. Site has regular

populations of Pluvialis apricaria and Limosa lapponica, both Annex I Bird Directive species, and eight other species winter in nationally important numbers. Phalacrocorax carbo has a nationally important breeding colony and small numbers of other breeding seabirds occur.

4.3. VULNERABILITY

The main activities affecting the estuarine and intertidal sand and mud flat habitats are pollution and aquaculture. Sewage, largely untreated, currently enters the site from Sligo town. A new treatment works is to be built which will significantly lessen this problem. Shellfish farming occurs at both Sligo Harbour and Drumcliff Bay on a large scale. While such activities cause localised disturbance to sediments and to wintering birds, all aquaculture applications are now assessed by Duchas to minimise impacts. Owing to growth of Sligo town, reclamation of estuarine habitat is a threat. The sand dune systems are subject to natural erosion which is exacerbated by intense recreational pressures. A significant area of dune has already been developed as a golf course.

4.4. SITE DESIGNATION:

4.5. OWNERSHIP

State : Department of the Marine

State : Department of Arts, Heritage, Gaeltacht and the Islands

Local Authority : Sligo County Council

Semi-state : Coillte

Private : multiple

4.6. DOCUMENTATION

Bowman, J.J., Clabby, K.J., Lucey, J., Mc Garrigle, M.L. and Toner, P.H. (1996). Water Quality in Ireland 1991-1994. Environmental Protection Agency, Wexford.

Cawley, M. (1996). Notes on some non-marine mollusca from Co Sligo and Co Leitrim, including a new site for Vertigo geyeri Lindholm. Irish Naturalists' Journal 25: 183-185.

Colhoun, K. (1998). I-WeBS Report 1996-97. 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 the Environment, Proceedings of the Royal Irish Academy 98B: 87-104.

Curtis, T.G.F. (1991a). A site inventory of the sandy coasts of Ireland. In Quigley, M.B. (ed.) A Guide to the Sand Dunes of Ireland. E.U.C.C. Dublin.

Curtis, T.G.F. (1991b). The flora and vegetation of sand dunes in Ireland. In Quigley, M.B. (ed.) A Guide to the Sand Dunes of Ireland. E.U.C.C., Dublin.

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.

Goodwillie, R. (1972). A Preliminary Report on Areas of Scientific Interest in County Sligo. An Foras Forbartha, Dublin.

Jennings O'Donovan & Partners (1998). Sligo Main Drainage Waste Water Treatment Works. Environmental Impact Statement, Main Report Volumes 1 and 2. Report prepared for Sligo Corporation.

Lockley, R.M. (1966). The distribution of grey and common seals on the coasts of Ireland. Irish Naturalists' Journal 15: 136-143.

Lloyd, C. (1982). Inventory of Seabird Breeding Colonies in Republic of Ireland, Unpublished report, Forestry and Wildlife Service, Dublin.

Merne, O.J. (1989). Important bird areas in the Republic of Ireland. In: Grimmett, R.F.A. and Jones, T.A. (eds) Important Bird Areas in Europe. ICBP Technical Publication No. 9., Cambridge.

Moorkens, E.A. (1997). An Inventory of Mollusca in Potential SAC Sites, with Special Reference to Vertigo angustior, V. moulinsiana and V. geyeri. Unpublished report, National Parks & Wildlife Service, Dublin.

Praeger, R.L. (1934). The Botanist in Ireland. Hodges, Figgis & Co, Dublin.

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

Summers, C.F., Warner, P.J., Nairn R.G.W., Curry, M.G. and Flynn, J. (1980). An assessment of the status of the common seal (Phoca vitulina vitulina) in Ireland. Biological Conservation 17: 115-123.

Warner, P. (1983). An assessment of the breeding populations of common seal (Phoca vitulina vitulina L.) in the Republic of Ireland during 1979. Irish Naturalists' Journal 21: 24-26.

Warner, P. (1984). Report on the Census of Common Seals (Phoca vitulina vitulina) in the Republic of Ireland during 1984. Unpublished document to the Forest & Wildlife Service, Dublin.

Cronin, M., Duck, C., Ó Cadhla, O., Nairn, R., Strong, D. and O'Keeffe, C. (2004). Harbour seal population assessment in the Republic of Ireland: August 2003. Irish Wildlife Manuals No. 11. National Parks & Wildlife Service, Department of Environment, Heritage and Local Government., 7 Ely Place, Dublin 2, Ireland. 34 pp.

Cronin, M., Duck, C., Ó Cadhla, O., Nairn, R., Strong, D. and O'Keeffe, C. (2007). An assessment of harbour seal population size and distribution in the Republic of Ireland during the 2003 moult season. J. Zool. Lond. 273 Issue 2: 131-139.

Harrington, R. (1990). 1989 survey of breeding herds of common seal Phoca vitulina with reference to previous surveys. Report to the National Parks & Wildlife Service. 10pp.

Lyons, D.O. (2004). Summary of National Parks & Wildlife Service surveys for common (harbour) seals (Phoca vitulina) and grey seals (Halichoerus grypus), 1978 to 2003. Irish Wildlife Manuals No. 13. National Parks & Wildlife Service, Department of Environment, Heritage and Local Government, 7 Ely Place, Dublin 2, Ireland. 67pp.

Roderick, T. (2009). Seal counts from Drumcliff Bay. Unpublished National Parks & Wildlife Service data, June 2007 - May 2008

5. SITE PROTECTION STATUS AND RELATION WITH CORINE BIOTOPES

5.1. DESIGNATION TYPES at National and Regional level:

CODE	% COVER
IE01	1
IE05	24

5.2. RELATION OF THE DESCRIBED SITE WITH OTHER SITES:

designated at National or Regional level:

TYPE CODE	SITE NAME	OVERLAP TYPE	% COVER
IE01	Ballygilgan, Lissadell, Nature Reserve	+	1
IE05	Drumcliff Bay (part) Wildfowl Sanctuary	*	24

designated at International level:

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

CORINE SITE CODE	OVERLAP TYPE	% COVER
800000466		
800000473		
800000476		

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
120	**A** B C	2	+ 0 -
120	A **B** C	1	+ 0 -
140	A **B** C	3	+ **0** -
140	A **B** C	3	+ 0 -
160	A **B** C	1	+ 0 -
200	**A** B C	10	+ 0 -
211	A **B** C	10	+ 0 -
220	A **B** C	30	+ **0** -
230	A B **C**	30	+ 0 -
301	A **B** C	1	+ 0 -
420	**A** B C	60	+ 0 -
505	A B **C**	1	+ 0 -
622	**A** B C	5	+ 0 -
870	A **B** C	2	+ 0 -
900	A **B** C	10	+ 0 -

IMPACTS AND ACTIVITIES AROUND the site

CODE	INTENSITY	INFLUENCE
120	A **B** C	+ 0 -
400	**A** B C	+ 0 -
410	**A** B C	+ 0 -
601	A **B** C	+ 0 -

6.2. SITE MANAGEMENT AND PLANS

BODY RESPONSIBLE FOR THE SITE MANAGEMENT

National Parks and Wildlife is responsible for managing the Ballygilgan Nature Reserve, and for maintaining the Drumcliff Bay Wildfowl Sanctuary as a No-shooting Area.

SITE MANAGEMENT AND PLANS

A management plan for the entire site is in preparation.

Ballygilgan Nature Reserve is managed for the benefit of Branta leucopsis and other waterfowl species. A hide and interpretative panels exist. The goose population is monitored by Duchas staff.

The Drumcliff Wildfowl Sanctuary is patrolled by Duchas staff so as to prevent shooting.

7. MAPS OF THE SITE

- Physical map

- Aerial photograph(s) included:

NUMBER	AREA	SUBJECT	DATE
0207041	Sligo Harbour - Drumcliff Bay	Overview of Site	199506
0207045	Sligo Harbour - Drumcliff Bay	Overview of Site - Outer Party	199506

8. SLIDES

NATURA 2000

STANDARD DATA FORM

FOR SPECIAL PROTECTION AREAS (SPA)

FOR SITES ELIGIBLE FOR IDENTIFICATION AS SITES OF COMMUNITY IMPORTANCE (SCI)

AND

FOR SPECIAL AREAS OF CONSERVATION (SAC)

1. SITE IDENTIFICATION

1.1. TYPE	*1.2. SITE CODE*	*1.3. COMPILATION DATE*	*1.4. UPDATE*
J	IE0004035	200311	

1.5. RELATION WITH OTHER NATURA 2000 SITES:

NATURA 2000 SITE CODES

IE0000627

1.6. RESPONDENT(S):

National Parks & Wildlife Service of the Department of the Environment, Heritage and Local Government. 7 Ely Place, Dublin 2, Ireland.

1.7. SITE NAME:

Cummeen Strand SPA

1.8. SITE INDICATION AND DESIGNATION/CLASSIFICATION DATES:

DATE SITE PROPOSED AS ELIGIBLE AS SCI:	*DATE CONFIRMED AS SCI:*

DATE SITE CLASSIFIED AS SPA:	*DATE SITE DESIGNATED AS SAC:*
199502	

2. SITE LOCATION

2.1. SITE CENTRE LOCATION

LONGITUDE	LATITUDE
W 8 32 0	54 17 30

W/E (Greenwich)

2.2. AREA (HA):

1732.43

2.3. SITE LENGTH (KM):

2.4. ALTITUDE (M):

MINIMUM	MAXIMUM	MEAN
-5	5	-2

2.5. ADMINISTRATIVE REGION:

NUTS CODE	REGION NAME	% COVER
IE011	Border	1
Marine area not covered by a NUTS-region		9

2.6. BIOGEOGRAPHIC REGION:

Alpine	Atlantic	Boreal	Continental	Macaronesian	Mediterranean
☐	☑	☐	☐	☐	☐

3. ECOLOGICAL INFORMATION

3.1. HABITAT types present on the site and assessment for them:

ANNEX I HABITAT TYPES:

CODE	%COVER	REPRESENTATIVITY	RELATIVE SURFACE	CONSERVATION STATUS	GLOBAL ASSESSMENT

3.2. SPECIES

covered by Article 4 of Directive 79/409/EEC

and

listed in Annex II of Directive 92/43/EEC

and

site assessment for them

3.2.a. BIRDS listed on Annex I of Council directive 79/409/EEC

CODE	NAME	POPULATION			SITE ASSESSMENT		
		Resident	Migratory		Population	Conservation	Isolation
			Breed	Winter Stage			
A140	Pluvialis apricaria			567 i	C	B	C
A157	Limosa lapponica			57 i	C	B	C

3.2.b. Regularly occuring Migratory Birds not listed on Annex I of Council directive 79/409/EEC

CODE	NAME	POPULATION			SITE ASSESSMENT		
		Resident	Migratory		Population	Conservation	Isolation
			Breed	Winter Stage			
A046	Branta bernicla			232 i	C	A	C
A048	Tadorna tadorna			80 i	C	A	C
A050	Anas penelope			178 i	C	B	C
A052	Anas crecca			70 i	C	B	C
A053	Anas platyrhynchos			170 i	C	B	C
A069	Mergus serrator			17 i	C	B	C
A130	Haematopus ostralegus			891 i	C	A	C
A137	Charadrius hiaticula			32 i	C	B	C
A142	Vanellus vanellus			734 i	C	B	C
A143	Calidris canutus			104 i	C	B	C
A144	Calidris alba			18 i	C	B	C
A149	Calidris alpina			601 i	C	B	C
A160	Numenius arquata			546 i	C	A	C
A162	Tringa totanus			501 i	C	A	C
A164	Tringa nebularia			18 i	C	A	C
A169	Arenaria interpres			80 i	C	B	C
A179	Larus ridibundus			353 i	C	B	C
A182	Larus canus			43 i	C	B	C

3.2.c. MAMMALS listed on Annex II of Council directive 92/43/EEC

3.2.d. AMPHIBIANS and REPTILES listed on Annex II of Council directive 92/43/EEC

3.2.e. FISHES listed on Annex II of Council directive 92/43/EEC

3.2.f. INVERTEBRATES listed on Annex II of Council directive 92/43/EEC

3.2.g. PLANTS listed on Annex II of Council directive 92/43/EEC

3.3. Other Important Species of Flora and Fauna

GROUP B M A R F I P	SCIENTIFIC NAME	POPULATION	MOTIVATION
B	Ardea cinerea	13 i	D

(B = Birds, M = Mammals, A = Amphibians, R = Reptiles, F = Fish, I = Invertebrates, P = Plants)

4. SITE DESCRIPTION

4.1. GENERAL SITE CHARACTER:

Habitat classes	% cover
Tidal rivers, Estuaries, Mud flats, Sand flats, Lagoons (including saltwork basins)	95
Salt marshes, Salt pastures, Salt steppes	2
Shingle, Sea cliffs, Islets	2
Other land (including Towns, Villages, Roads, Waste places, Mines, Industrial sites)	1
Total habitat cover	**100 %**

Other site characteristics

Cummeen Strand SPA comprises the greater part of Sligo Harbour, the middle one of the three 'arms' forming Sligo Bay. The site extends for up to 7 km from east to west and has an average width of c.2.5 km. The site is the estuary of the Garavoge River, a short slow-flowing river which flows from Lough Gill. The harbour is very enclosed, with the mouth of the harbour being sheltered by two islands (Coney Island and Oyster Island). A large proportion of the estuary is intertidal (> 80%). Sediments are predominantly sands or coarser materials, though muddy sands or muds also occur. Zostera beds are present. The intertidal sand and mud flats are fringed by salt marshes in places but mostly stony shoreline. Sligo Harbour is a regional port for the town of Sligo.

4.2. QUALITY AND IMPORTANCE:

Cummeen Strand is of importance for the diversity of wintering waterfowl and is an integral part of the larger unit of Sligo Bay. The site has an internationally important population of Branta bernicla hrota and supports nationally important numbers of Haematopus ostralegus and Tringa totanus. Both Pluvialis apricaria and Limosa lapponica utilise the site though in relatively low numbers. The intertidal flats, which have well-developed macro-invertebrate communities and Zostera beds, provide good feeding grounds for the wintering birds. Birds roost on the salt marshes and upper shoreline though on high tides some may leave the site to roost elsewhere.

4.3. VULNERABILITY

There are no significant imminent threats to the wintering bird populations. Shellfish farming occurs in Sligo Harbour on a large scale and could cause localised disturbance to sediments and to the wintering birds. Sewage, largely untreated, currently enters the site from Sligo town, though this may not necessarily have adverse effects on the birds. A new treatment works is to be built which will significantly improve water quality.

4.4. SITE DESIGNATION:

4.5. OWNERSHIP

State : Department of Communications, Marine and Natural Resources

Private

4.6. DOCUMENTATION

Colhoun, F. (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.

Goodwillie, R. (1972). A Preliminary Report on Areas of Scientific Interest in County Sligo. An Foras Forbartha, 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.

Jennings O'Donovan and Partners (1998). Sligo Main Drainage Waste Water Treatment Works. Environmental Impact Statement, Main Report Volumes 1 and 2. Report prepared for Sligo Corporation.

McGarrigle M.L., Bowman J.J., Clabby K.J., Lucey J., Cunningham P., MacCarthaigh M., Keegan M., Cantrell B., Lehane M., Clenaghan C. and Toner P.F. (2002). Water Quality in Ireland 1998-2000. Environmental Protection Agency, Wexford.

Merne, O.J. (1989). Important bird areas in the Republic of Ireland. In: Grimmett, R.F.A. and Jones, T.A. (eds). Important Bird Areas in Europe. ICBP Technical Publication No. 9. Cambridge.

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
800000473		

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	10	+ 0 -
220	A B **C**	20	+ **0** -
410	**A** B C	1	+ 0 -
520	**A** B C	10	+ **0** -
700	A **B** C	100	+ 0 -
802	**A** B C	1	+ 0 -

IMPACTS AND ACTIVITIES AROUND the site

CODE	INTENSITY	INFLUENCE
120	A **B** C	+ 0 -
400	**A** B C	+ 0 -
410	**A** B C	+ 0 -
502	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 this site is being prepared.

7. MAPS OF THE SITE

- Physical map

- Aerial photograph(s) included:

8. SLIDES

NATURA 2000

STANDARD DATA FORM

FOR SPECIAL PROTECTION AREAS (SPA)

FOR SITES ELIGIBLE FOR IDENTIFICATION AS SITES OF COMMUNITY IMPORTANCE (SCI)

AND

FOR SPECIAL AREAS OF CONSERVATION (SAC)

1. SITE IDENTIFICATION

1.1. TYPE	*1.2. SITE CODE*	*1.3. COMPILATION DATE*	*1.4. UPDATE*
J	IE0004129	200404	

1.5. RELATION WITH OTHER NATURA 2000 SITES:

NATURA 2000 SITE CODES

IE0000622

1.6. RESPONDENT(S):

National Parks & Wildlife Service of the Department of the Environment, Heritage and Local Government. 7 Ely Place, Dublin 2, Ireland

1.7. SITE NAME:

Ballysadare Bay SPA

1.8. SITE INDICATION AND DESIGNATION/CLASSIFICATION DATES:

DATE SITE PROPOSED AS ELIGIBLE AS SCI: *DATE CONFIRMED AS SCI:*

DATE SITE CLASSIFIED AS SPA: *DATE SITE DESIGNATED AS SAC:*

2. SITE LOCATION

2.1. SITE CENTRE LOCATION

LONGITUDE	LATITUDE
W 8 35 0	54 14 0

W/E (Greenwich)

2.2. AREA (HA):

2146.13

2.3. SITE LENGTH (KM):

2.4. ALTITUDE (M):

MINIMUM	MAXIMUM	MEAN
-5	39	-1

2.5. ADMINISTRATIVE REGION:

NUTS CODE	REGION NAME	% COVER
IE011	Border	10
Marine area not covered by a NUTS-region		9

2.6. BIOGEOGRAPHIC REGION:

Alpine	Atlantic	Boreal	Continental	Macaronesian	Mediterranean
☐	☑	☐	☐	☐	☐

3. ECOLOGICAL INFORMATION

3.1. HABITAT types present on the site and assessment for them:

ANNEX I HABITAT TYPES:

CODE	%COVER	REPRESENTATIVITY	RELATIVE SURFACE	CONSERVATION STATUS	GLOBAL ASSESSMENT

3.2. SPECIES

covered by Article 4 of Directive 79/409/EEC

and

listed in Annex II of Directive 92/43/EEC

and

site assessment for them

3.2.a. BIRDS listed on Annex I of Council directive 79/409/EEC

CODE	NAME	POPULATION			SITE ASSESSMENT		
		Resident	Migratory		Population	Conservation	Isolation
			Breed	Winter Stage			
A157	Limosa lapponica			251 i	C	A	C
A140	Pluvialis apricaria			301 i	C	B	C
A038	Cygnus cygnus			15 i	C	C	C

3.2.b. Regularly occuring Migratory Birds not listed on Annex I of Council directive 79/409/EEC

CODE	NAME	POPULATION			SITE ASSESSMENT		
		Resident	Migratory		Population	Conservation	Isolation
			Breed	Winter Stage			
A046	Branta bernicla			188 i	C	B	C
A048	Tadorna tadorna			55 i	C	B	C
A050	Anas penelope			617 i	C	B	C
A052	Anas crecca			179 i	C	B	C
A053	Anas platyrhynchos			304 i	C	B	C
A067	Bucephala clangula			17 i	C	C	C
A069	Mergus serrator			26 i	C	B	C
A130	Haematopus ostralegus			516 i	C	B	C
A137	Charadrius hiaticula			96 i	C	B	C
A141	Pluvialis squatarola			67 i	C	B	C
A142	Vanellus vanellus			467 i	C	B	C
A149	Calidris alpina			1420 i	C	A	C
A160	Numenius arquata			508 i	C	B	C
A162	Tringa totanus			435 i	C	A	C
A164	Tringa nebularia			22 i	C	B	C
A169	Arenaria interpres			40 i	C	B	C
A179	Larus ridibundus			261 i	C	B	C
A182	Larus canus			174 i	C	B	C
A017	Phalacrocorax carbo			43 i	C	B	C

3.2.c. MAMMALS listed on Annex II of Council directive 92/43/EEC

3.2.d. AMPHIBIANS and REPTILES listed on Annex II of Council directive 92/43/EEC

3.2.e. FISHES listed on Annex II of Council directive 92/43/EEC

3.2.f. INVERTEBRATES listed on Annex II of Council directive 92/43/EEC

3.2.g. PLANTS listed on Annex II of Council directive 92/43/EEC

3.3. Other Important Species of Flora and Fauna

GROUP	SCIENTIFIC NAME	POPULATION	MOTIVATION
B M A R F I P			
B	Ardea cinerea	16 i	C

(B = Birds, M = Mammals, A = Amphibians, R = Reptiles, F = Fish, I = Invertebrates, P = Plants)

1/2

AQUAFACT

WWTP
- MAPS underpinning My submission
- Whorl Snail

Hydrodynamic Dispers
Strandhill Sewerag

Produced by

AQUAFACT International Services Ltd

On behalf of

Nicholas O'Dwyer Ltd.

June 2013

AQUAFACT INTERNATIONAL SERVICES ltd
12 KILKERRIN park
TUAM rd
GALWAY city
www.aquafact.ie

info@aquafact.ie

tel +353 (0) 91 756812
fax +353 (0) 91 756888

Table of Contents

1. Introduction 1

2. Hydrodynamic and Dispersion Model Description 2

2.1. TELEMAC Hydraulic Software System 2
2.2. Data Sources 3
2.3. Model Domain 3

3. Hydrodynamics 6

4. Water Quality Dispersion Simulations 13

4.1. Water Quality Standards 13
4.2. Total Coliform Simulations 14
4.3. DIN Simulations 24

5. Conclusion 33

List of Figures

Figure 1.1: Outfall option locations off Killaspug Point, Strandhill 2
Figure 2.1: Model domain Study Area 4
Figure 2.2: Extent and resolution of Finite element Mesh developed for Strandhill Dispersion Model 5
Figure 2.3: Tide elevation boundary used to drive model 5
Figure 2.4: Model bathymetry for Strandhill dispersion model extracted from Admiralty Charts 6
Figure 3.1: Location of ADCP meter used to measure tide velocities 7
Figure 3.2: Velocity rose for near-surface velocities over monitoring period 8
Figure 3.3: Velocity rose for mid-depth velocities over monitoring period 9
Figure 3.4: Velocity rose for near-bottom velocities over monitoring period 10
Figure 3.5: Comparison of measured and computed velocity magnitudes at ADCP location 11
Figure 3.6: Typical mid-flood velocities within the study area 12
Figure 3.7: Typical mid-ebb velocities within the study area 12
Figure 4.1: Reference sites for model output 14
Figure 4.2: Maximum total coliform concentrations for outfall option 1 and treated effluent of 1.0E+07 No./100ml 17
Figure 4.3: Tidal averaged total coliform concentrations for outfall option 1 and treated effluent of 1.0E+07 No./100ml. 18
Figure 4.4: Maximum total coliform concentrations for outfall option 1 and treated effluent of 1.0E+04 No./100ml (with disinfection) 19

Figure 4.5: Tidal averaged total coliform concentrations for outfall option 1 and treated effluent of 1.0E+04 No./100ml (with disinfection) 20
Figure 4.6: Total coliform concentrations for outfall option 2 and treated effluent of 1.0E+07 No./100ml 21
Figure 4.7: Tidal averaged total coliform concentrations for outfall option 2 and treated effluent of 1.0E+07 No./100ml 22
Figure 4.8: Maximum total coliform concentrations for outfall option 3 and treated effluent of 1.0E+08 No./100ml 23
Figure 4.9: Tidal averaged total coliform concentrations for outfall option 3 and treated effluent of 1.0E+08 No./100ml 24
Figure 4.10: Maximum DIN concentrations for outfall option 1 and treated effluent of 8.5 mg/l DIN as N 26
Figure 4.11: Tidal averaged DIN concentrations for outfall option 1 and treated effluent of 8.5 mg/l DIN as N 27
Figure 4.12: Maximum DIN concentrations for outfall option 1 and treated effluent of 40mg/l DIN as N 28
Figure 4.13: Tidal averaged DIN concentrations for outfall option 1 and treated effluent of 40mg /l DIN as N 29
Figure 4.14: Maximum DIN concentrations for outfall option 2 and treated effluent of 40mg/l DIN as N 30
Figure 4.15: Tidal averaged DIN concentrations for outfall option 2 and treated effluent of 40mg/l DIN as N 31
Figure 4.16: Maximum DIN concentrations for outfall option 3 and treated effluent of 50mg/l DIN as N 32
Figure 4.17: Tidal averaged DIN concentrations for outfall option 3 and treated effluent of 50mg/l DIN as N 33

List of Tables

Table 1.1: Dispersion treatment standards for the three outfall options. 1
Table 4.1: Extract From Surface Water Regulations 2009 pertaining to limits for Dissolved Inorganic Nitrogen and total coliforms. 13
Table 4.2: Predicted total coliform concentrations for outfall option 1 – secondary treatment with final effluent total coliform concentration of 1.0E+07 15
Table 4.3: Total coliform concentrations for outfall option 1 with disinfection with final effluent total coliform concentration of 1.0E+04 15
Table 4.4: Predicted total coliform concentrations for outfall option 2 – secondary treatment with final effluent total coliform concentration of 1.0E+07 16
Table 4.5: Predicted total coliform concentrations for Outfall Option 3 –with final effluent total coliform concentration of 1.0E+08 16
Table 4.6: Predicted DIN concentrations at reference sites for outfall option 1 (Site A) with final DIN effluent concentration of 8.5mg/l 25
Table 4.7: Predicted DIN concentrations at reference sites for outfall option 1 (Site A) with final DIN effluent concentration of 40.0mg/l 25
Table 4.8: Predicted DIN concentrations at reference sites for outfall option 2 (Site B) with final DIN effluent concentration of 40.0mg/l 25
Table 4.9: Predicted DIN concentrations at reference sites for outfall option 3 (Site C) with final DIN effluent concentration of 50.0mg/l 26

1. Introduction

AQUAFACT International Services Ltd. was commissioned by Nicholas O'Dwyer Ltd. to undertake hydrodynamic dispersion modelling of a proposed marine sewage outfall for the Strandhill Sewerage Scheme. The objective of the study was to evaluate the most suitable outfall location and treatment option that complies with the surface water regulations for the Coastal Waters.

For purposes of this study, the TELEMAC hydrodynamic and dispersion modelling software was used to develop a two-dimensional depth averaged hydrodynamic, dispersion and water quality model of the Ballysadare Bay, Sligo Harbour and Drumcliff Bay area and their approaches.

Three outfall locations for the Strandhill marine outfall were considered (refer to Figure 1.1), namely:

Option 1 Locate at existing outfall (Site A) just below the low water mark

Option 2 Extend outfall 600m offshore (Site B)

Option 3 Extend outfall 1500m offshore (Site C)

Different treatment standards for respective outfall locations were considered and can be seen in Table 1.1

Table 1.1: Dispersion treatment standards for the three outfall options.

Effluent Concentrations	Outfall Option 1	Outfall Option 2	Outfall Option 3
BOD (mg/l)	25	25	187
Suspended Solids (mg/l)	35	35	183
DIN (mg/l)	(A) 8.5 (B) 40.0	40.0	50.0
Total coliform MPN/100ml Secondary Treatment Disinfection	(A) 1.0E+07 (B) 1.0E+04	1.0E+07	1.0E+08

The Wastewater Treatment Plant daily dry weather flow (DWF) is 7.8l/s and peak flow capacity of the outfall is designed to accommodate 6DWF (47l/s).

The critical water quality parameters for outfall site selection were identified as Total Coliform and DIN (Dissolved Inorganic Nitrogen) concentrations.

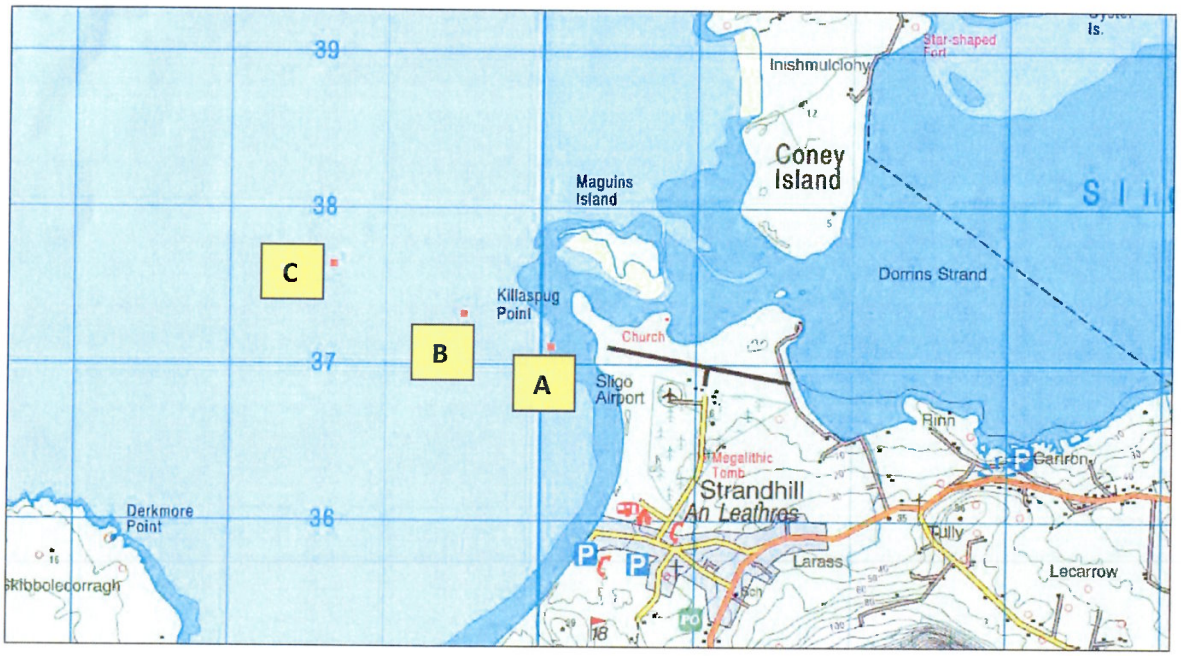


Figure 1.1: Outfall option locations off Killaspug Point, Strandhill

2. Hydrodynamic and Dispersion Model Description

2.1. TELEMAC Hydraulic Software System

The TELEMAC system is the software of choice for modelling the complicated hydrodynamics of the coastal water and tidal flats near Strandhill, particularly given the very high computation refinement required to model the narrow low water channels entrances to Sligo Harbour, Ballysadare Bay and Drumcliff Bay. TELEMAC is a software system designed to study environmental processes in free surface transient flows. It is therefore applicable to seas and coastal domains, estuaries, rivers and lakes. Its main fields of application are in hydrodynamics, water quality, sedimentology and water waves.

TELEMAC is an integrated, user friendly software system for free surface waters. TELEMAC was originally developed by Laboratoire National d'Hydraulique of the French Electricity Board (EDF-LNHE), Paris. It is now under the directorship of a consortium of organisations including EDF-LNHE, HR Wallingford, SOGREAH, BAW and CETMEF. It is regarded as one of the leading software packages internationally for free surface water hydraulic applications.

The TELEMAC system is a powerful integrated modelling tool for use in the field of free-surface flows. Having been used in the context of very many studies throughout the world (many thousand to date), it has become

one of the major standards in its field. The various simulation modules use high-capacity algorithms based on the finite-element method. Space is discretised in the form of an unstructured grid of triangular elements, which means that it can be refined particularly in areas of special interest. This avoids the need for systematic use of embedded models, as is the case with the finite-difference method. Telemac-2D is a two-dimensional computational code describing the horizontal velocities, water depth and free surface over space and time. In addition it solves the transport of several tracers which can be grouped into two categories, active and passive, with salinity and temperature being the active tracers which alter density and thus the hydrodynamics.

2.2. *Data Sources*

Bathymetric

The bathymetry defining the sea bed and mudflats is presented in Figure 2.4 below. The sources of data used to define the existing bathymetry is from relevant admiralty charts in the vicinity of the proposed outfall route, which was checked and found to be reasonably representative.

Hydrometric Data

- ADCP survey 27th March 2013 to 12th April 2013
- Ungauged catchments analysis for watercourses
- Tide elevation measurements 27th March 2013 to 12th April 2013

2.3. *Model Domain*

The model domain area is presented in Figure 2.1 which covers the Ballysadare Bay to the south, Sligo Harbour and Drumcliff Bay to the north and their coastal approaches. The model domain represents a tidal waterbody of some 87km^2 in area with extensive dry areas and highly variable bathymetry and channel widths.



Figure 2.1: Model domain Study Area

The TELEMAC software being finite element based allows for a variable density triangular meshing which allows high refinement in the areas of interest and narrow channel sections and coarser meshing away from such areas and in the wider estuary areas. Figure 2.2 presents the model domain and the meshing used.

The hydrodynamic and dispersion simulations were driven by a tide elevation boundary condition specified along the western model opensea boundary, refer to Figure 2.3 below. Mean freshwater inflow was also specified for the Garvoge, Drumcliff and Ballysadare rivers.

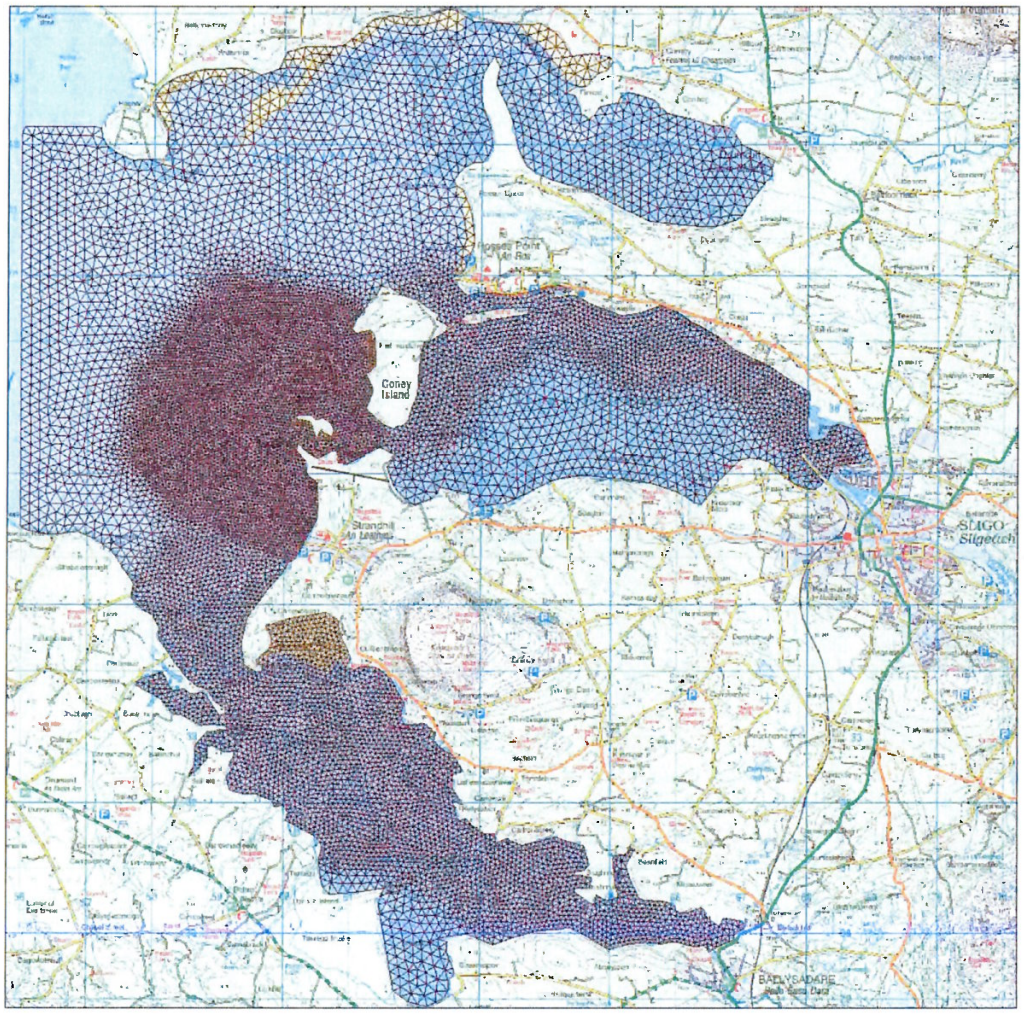


Figure 2.2: Extent and resolution of Finite element Mesh developed for Strandhill Dispersion Model

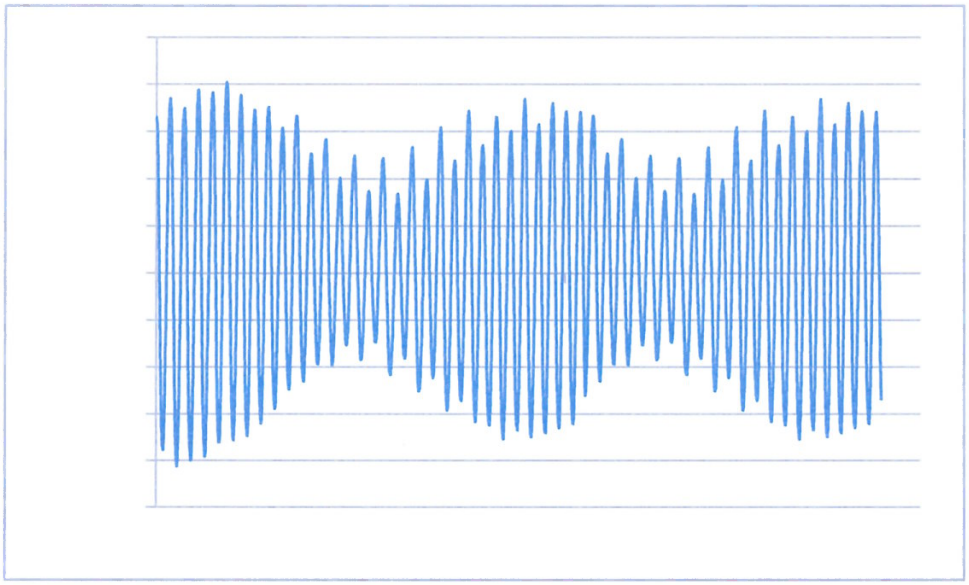


Figure 2.3: Tide elevation boundary used to drive model

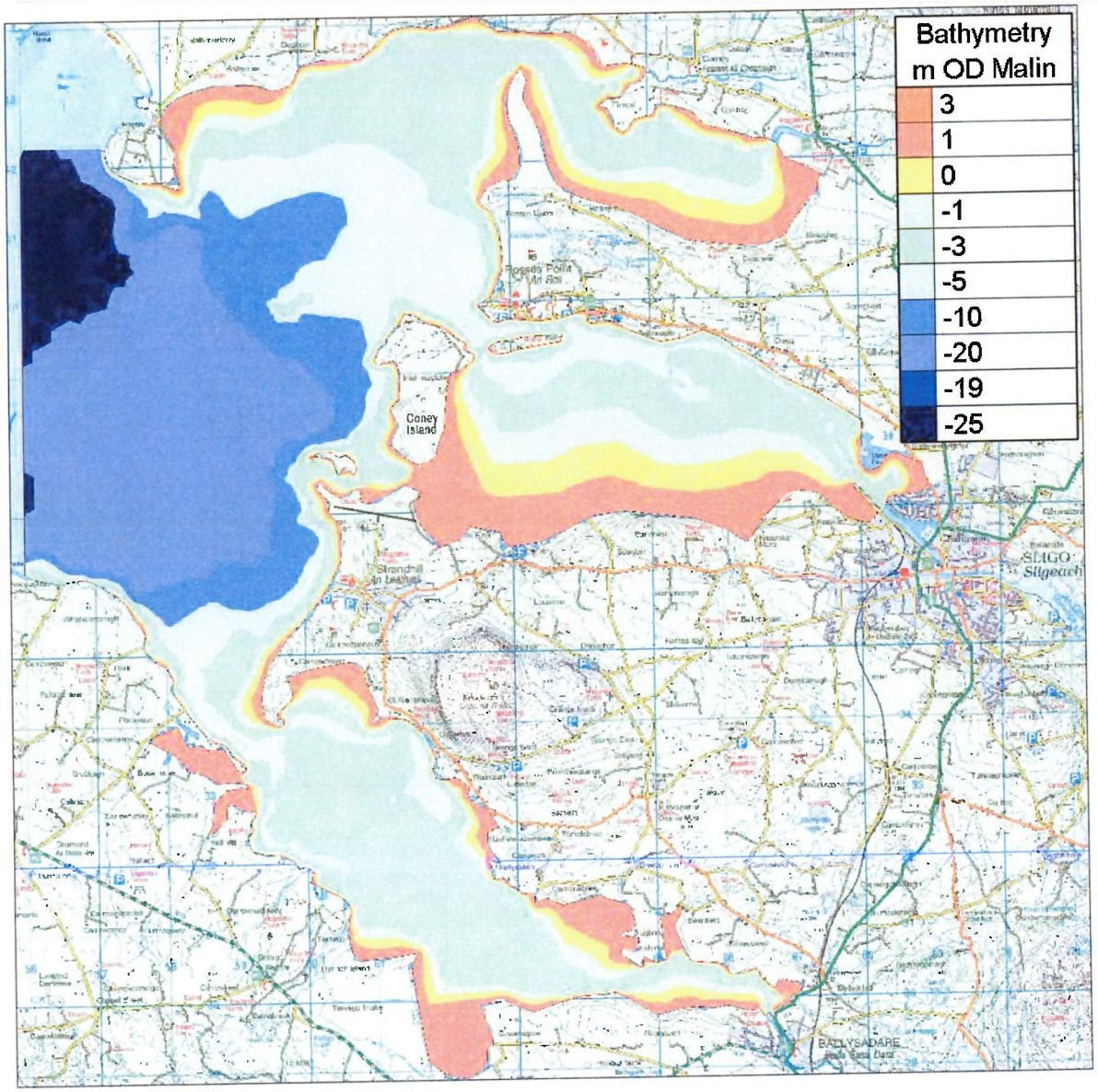


Figure 2.4: Model bathymetry for Strandhill dispersion model extracted from Admiralty Charts

3. Hydrodynamics

An ADCP current meter was deployed 1200m off (west of) Killaspug Point at grid location (159026E, 337424N, refer to Figure 3.1) for 16 days from the 27th March to the 12th April 2013 to provide information on spring neap tidal range and velocity magnitude through the water column. The deployment location was located midway between outfall option 2 and option 3 sites, refer to Figure 3.1. Velocity roses from this data are presented for the near surface layer, mid-depth layer and near bottom layer in Figures 3.2 to 3.4.



Figure 3.1: Location of ADCP meter used to measure tide velocities

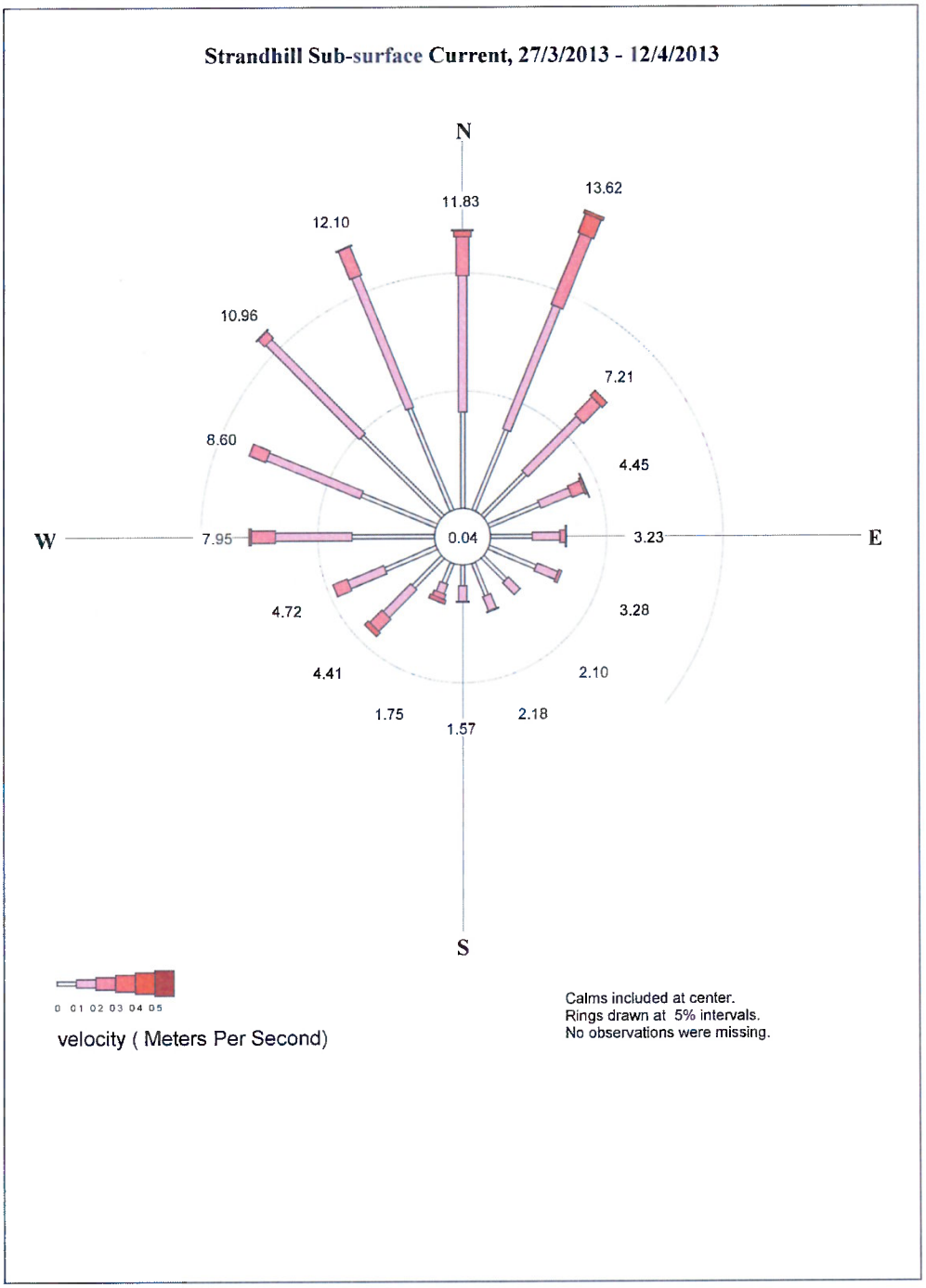


Figure 3.2: Velocity rose for near-surface velocities over monitoring period

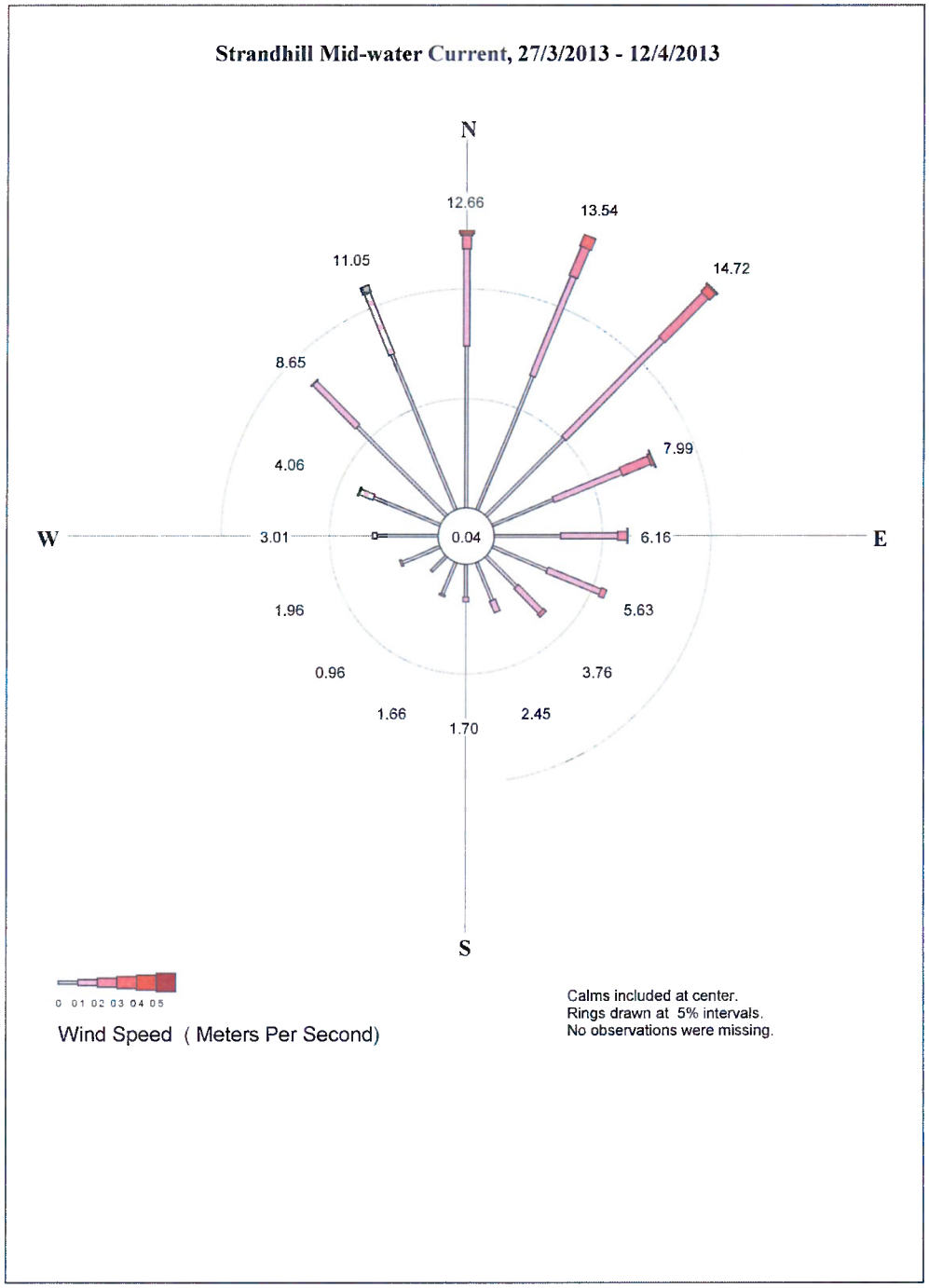


Figure 3.3: Velocity rose for mid-depth velocities over monitoring period

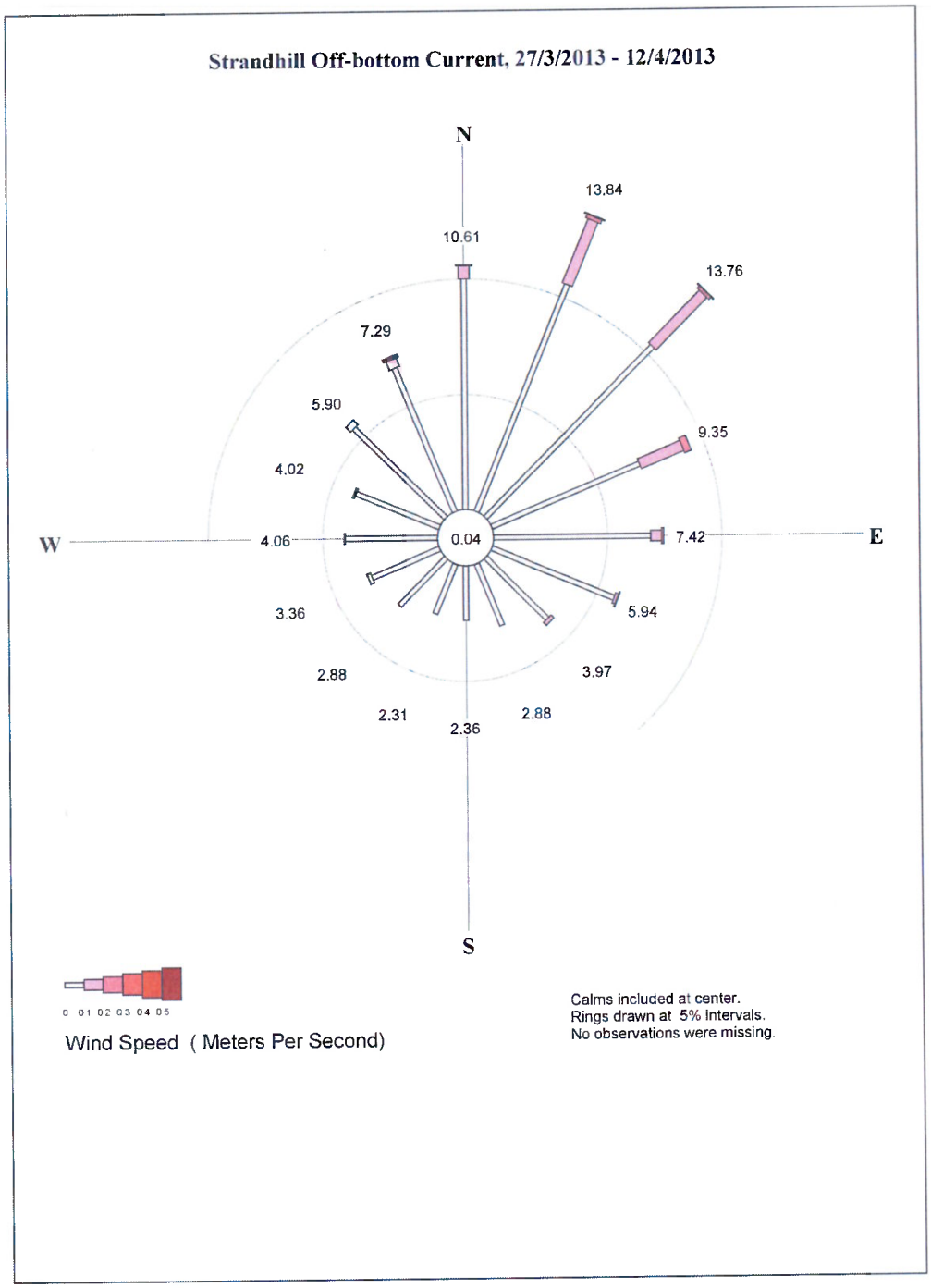


Figure 3.4: Velocity rose for near-bottom velocities over monitoring period

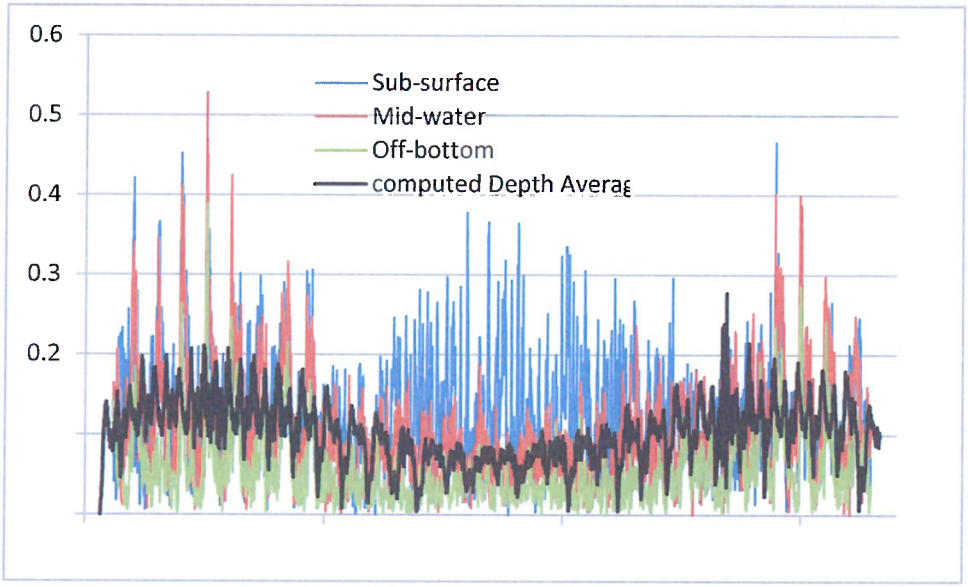


Figure 3.5: Comparison of measured and computed velocity magnitudes at ADCP location

The model predictions of velocity at the ADCP measurement site (Figure 3.5) shows reasonably good agreement with the measured data.

The hydrodynamic simulations show relatively slack velocities in the vicinity of the proposed outfall locations off Strandhill over spring and neap tides. Strong currents exist in the vicinity of the mouths to Ballysadare Bay, Sligo Harbour and Drumcliff Bay, refer to Figures 3.6 and 3.7. The sea bed bathymetry gives a depth below malin head datum of 2.5m for outfall option 1, 11m for outfall option 2 and 13m for outfall option 3.

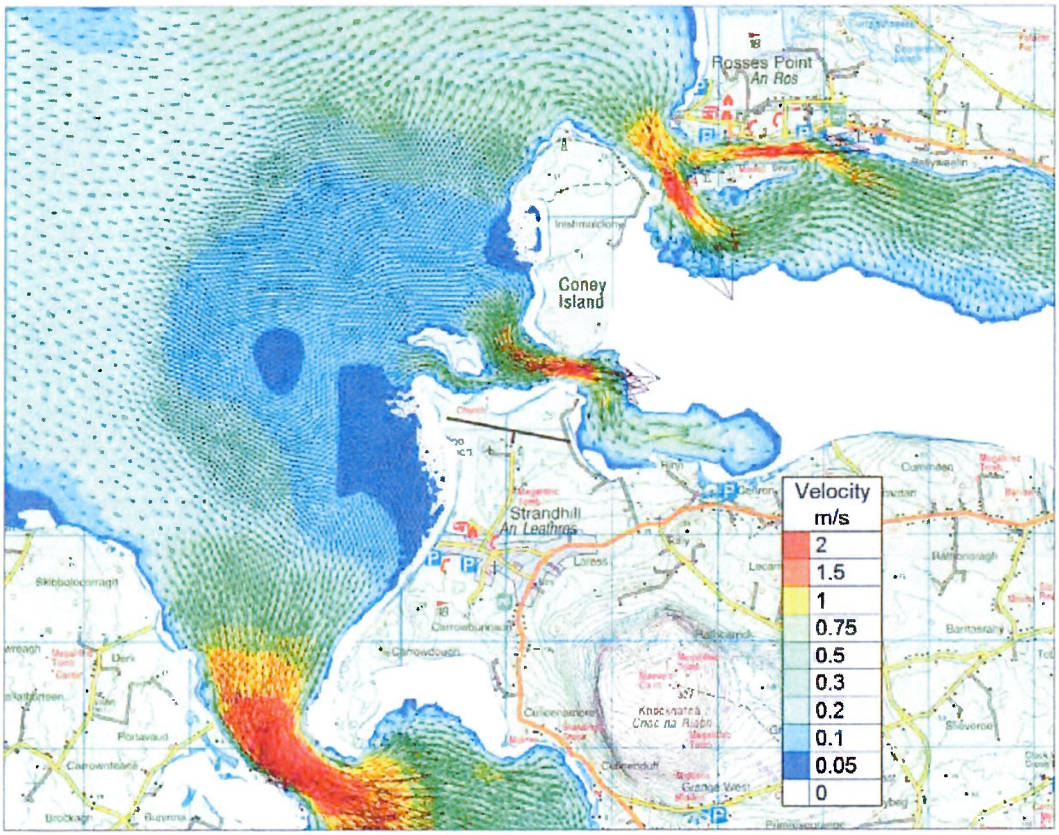


Figure 3.6: Typical mid-flood velocities within the study area

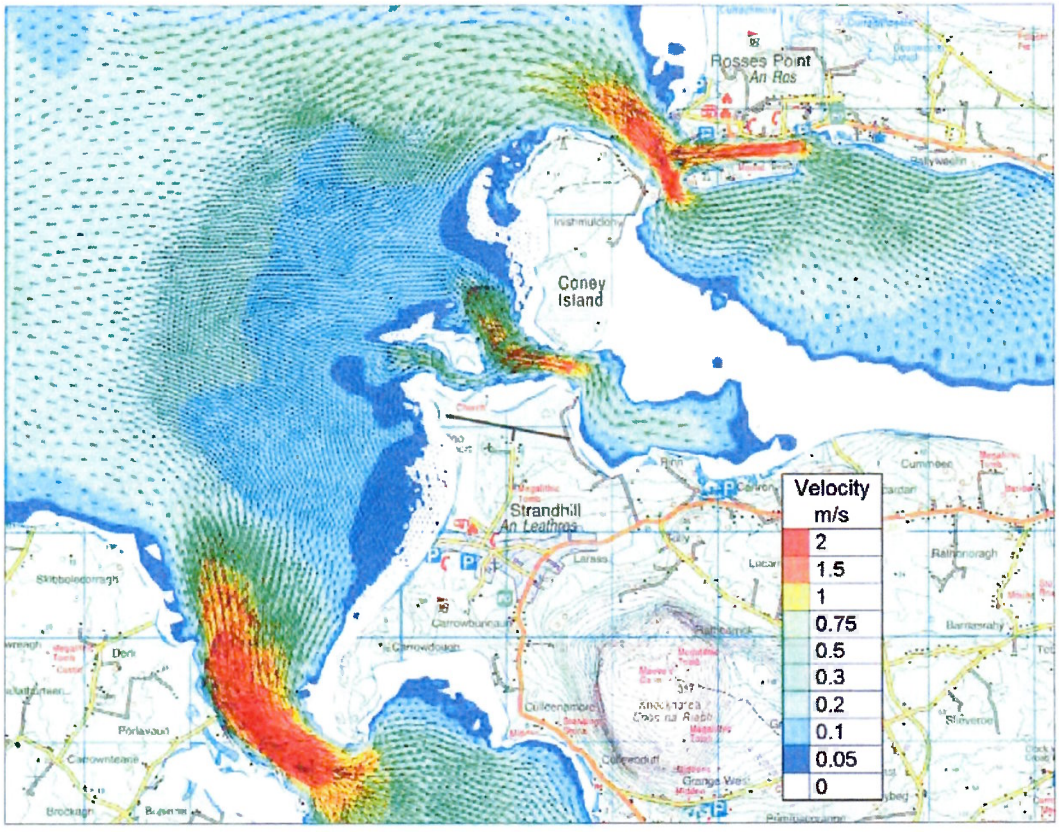


Figure 3.7: Typical mid-ebb velocities within the study area

4. Water Quality Dispersion Simulations

4.1. Water Quality Standards

WFD classification systems and environmental quality standards (EQS) were developed for the purpose of assessing the ecological status of surface waters in Ireland using these suites of quality elements. These standards were brought into force under the European Communities Environmental Objectives (Surface Waters) Regulations 2009 that came into operation on the 30th July 2009. These regulations apply to all surface waters and are made to give effect to the measures needed to achieve the environmental objectives established for bodies of surface water by Directive 2000/60/EC of the European Parliament and of the Council including the environmental quality standards established by Directive 2008/105/EC and to give further effect to the requirements of Directive 2006/11/EC.

Table 4.1: Extract From Surface Water Regulations 2009 pertaining to limits for Dissolved Inorganic Nitrogen and total coliforms.

	Surface Water Regulations 2009 Coastal
Dissolved Inorganic Nitrogen (mg N/l)	Good Status (34.5 psu) ≤0.25 High Status (34.5 psu) ≤0.17

	EC Directive concerning the quality of bathing waters 76/160/EEC		National Limit Values (SI No.155 of 1992)
Parameter	**Guide**	**Mandatory**	
***Total Coliforms* (cfu/100ml)**	≤500*	≤10,000**	≤5000*, ≤10,000**
***Faecal Coliforms* (cfu/100ml)**	≤100*	≤2,000**	≤1,000*, ≤2,000**

* ≥80% of samples ** ≥90% of samples

Twelve reference sites within the study area were selected plus the outfall location where time series of parameter concentration were output for detailed analysis, refer to Figure 4.1. The simulations were performed for a full lunar cycle which insured that equilibrium conditions were attained to assess the spring-neap variation and the long term build-up of DIN and total coliforms.

A conservative die off rate T_{90} of 36hours was specified for the total coliform simulation which allows for low night time die-off of 60hours and day light die-off T_{90} of 12hours. In the simulations DIN was treated as a fully conservative water quality parameter (i.e. no decay).

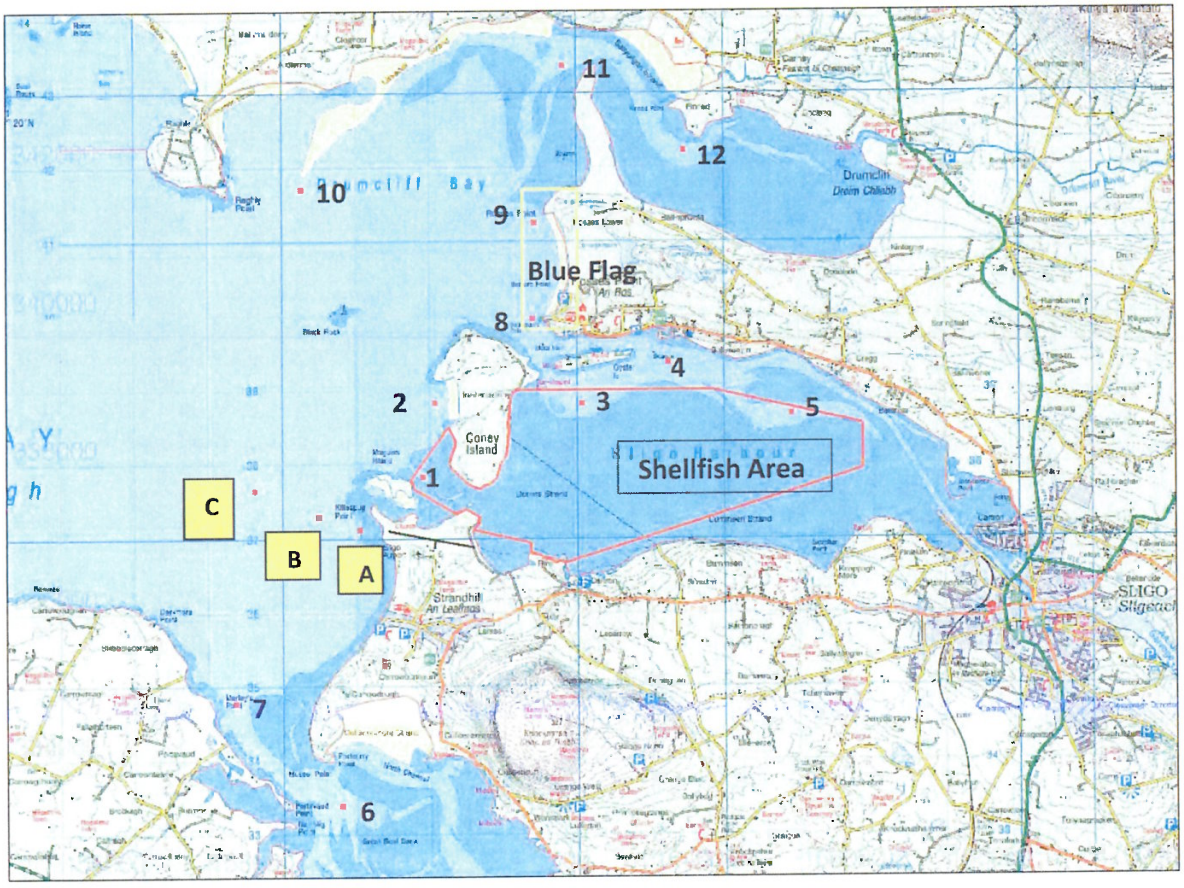


Figure 4.1: Reference sites for model output

4.2. *Total Coliform Simulations*

Four simulation runs over a lunar month was carried out modelling total coliform, two simulation runs for outfall option 1 involving secondary treatment with and without disinfection, secondary treatment at outfall option 2 and primary treatment at outfall option 3. The location of the designated shellfish area within Sligo Beach and the Blue Flag beach area at Rosses Point, (refer to Figure 4.1) are the primary target areas to be considered by this assessment. The model was run for a lunar cycle and the final 2 week period which includes full spring-neap cycle was assessed in terms of mean and maximum coliform concentrations. The simulations were carried out independent of ambient background concentrations. Tables 4.2 to 4.5 present summary statistics of predicted coliform concentrations over the spring-neap cycle for the 4 simulations and Figures 4.2 to 4. 9present maximum and mean coliform concentration contour plots within the study area for

the four model runs.

These clearly show that outfall option 1 with disinfection has minimal impact on the receiving waters and will protect the designated shellfish areas and the Blue flag beach from discernible impact. The option of extending the outfall offshore and reducing the level of treatment is shown not to sufficiently protect the inshore bathing and shellfish areas and such outfall options would still require disinfection.

Table 4.2: Predicted total coliform concentrations for outfall option 1 – secondary treatment with final effluent total coliform concentration of 1.0E+07

Sites	A	1	2	3	4	5	6
Average	17,191.6	143.44	49.11	12.37	6.74	2.408	0.157
Median	11,715.4	130.50	48.69	8.54	4.42	0.765	0.101
Maximum	52,101.2	396.36	76.46	42.90	23.74	13.560	0.988
Minimum	3,331.7	32.11	29.15	0.59	0.18	0.016	0.003
Sites	**7**	**8**	**9**	**10**	**11**	**12**	
Average	0.085	5.877	3.492	1.601	1.053	0.791	
Median	0.028	4.821	3.349	1.523	0.785	0.429	
Maximum	22.380	22.380	7.968	4.333	2.942	2.942	
Minimum	0.000	1.031	1.299	0.274	0.053	0.020	

Table 4.3: Total coliform concentrations for outfall option 1 with disinfection with final effluent total coliform concentration of 1.0E+04

Sites	A	1	2	3	4	5	6
Average	17.195	0.143	0.049	0.012	0.007	0.002	0.000
Median	11.723	0.130	0.049	0.009	0.004	0.001	0.000
Maximum	52.101	0.396	0.076	0.043	0.024	0.014	0.001
Minimum	3.332	0.032	0.029	0.001	0.000	0.000	0.000
Sites	**7**	**8**	**9**	**10**	**11**	**12**	
Average	0.000	0.006	0.003	0.002	0.001	0.001	
Median	0.000	0.005	0.003	0.002	0.001	0.000	
Maximum	0.022	0.022	0.008	0.004	0.003	0.003	
Minimum	0.000	0.001	0.001	0.000	0.000	0.000	

Table 4.4: Predicted total coliform concentrations for outfall option 2 – secondary treatment with final effluent total coliform concentration of 1.0E+07

Sites	B	1	2	3	4	5	6
Average	3019.8	86.53	43.66	11.27	6.47	2.42	0.01
Median	2801.8	69.80	41.83	7.97	4.174	0.77	0.01
Maximum	6992.4	301.98	83.52	37.03	22.29	13.26	0.06
Minimum	1177.2	17.71	22.71	0.48	0.15	0.01	0.00
Sites	**7**	**8**	**9**	**10**	**11**	**12**	
Average	0.01	6.36	4.55	1.95	1.22	0.90	
Median	0.01	4.95	4.89	1.80	0.86	0.48	
Maximum	20.01	20.01	9.02	5.47	3.77	3.57	
Minimum	0.00	0.93	1.16	0.31	0.05	0.02	

Table 4.5: Predicted total coliform concentrations for Outfall Option 3 –with final effluent total coliform concentration of 1.0E+08

Sites	C	1	2	3	4	5	6
Average	17590.9	24.93	31.62	16.759	12.45	4.65	5.12
Median	16335.6	21.28	26.37	8.498	6.36	1.36	3.32
Maximum	52557.4	118.24	100.02	88.406	52.69	33.71	33.71
Minimum	7150.7	1.60	3.42	0.376	0.19	0.021	0.14
Sites	**7**	**8**	**9**	**10**	**11**	**12**	
Average	3.80	19.19	24.63	10.66	5.00	3.27	
Median	2.95	13.02	20.36	10.36	3.06	1.66	
Maximum	83.07	83.07	80.00	31.68	20.46	15.27	
Minimum	0.38	1.00	1.92	0.86	0.09	0.04	

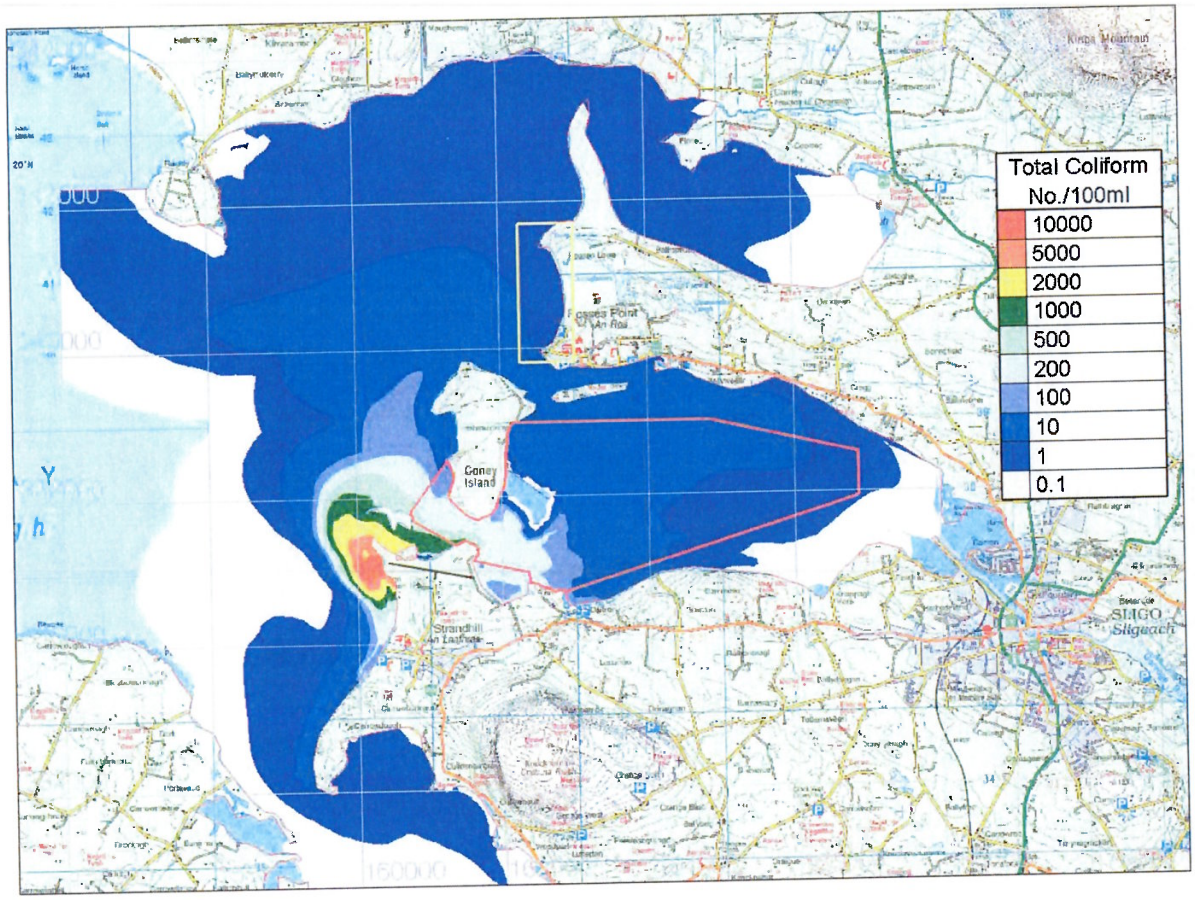


Figure 4.2: Maximum total coliform concentrations for outfall option 1 and treated effluent of 1.0E+07 No./100ml

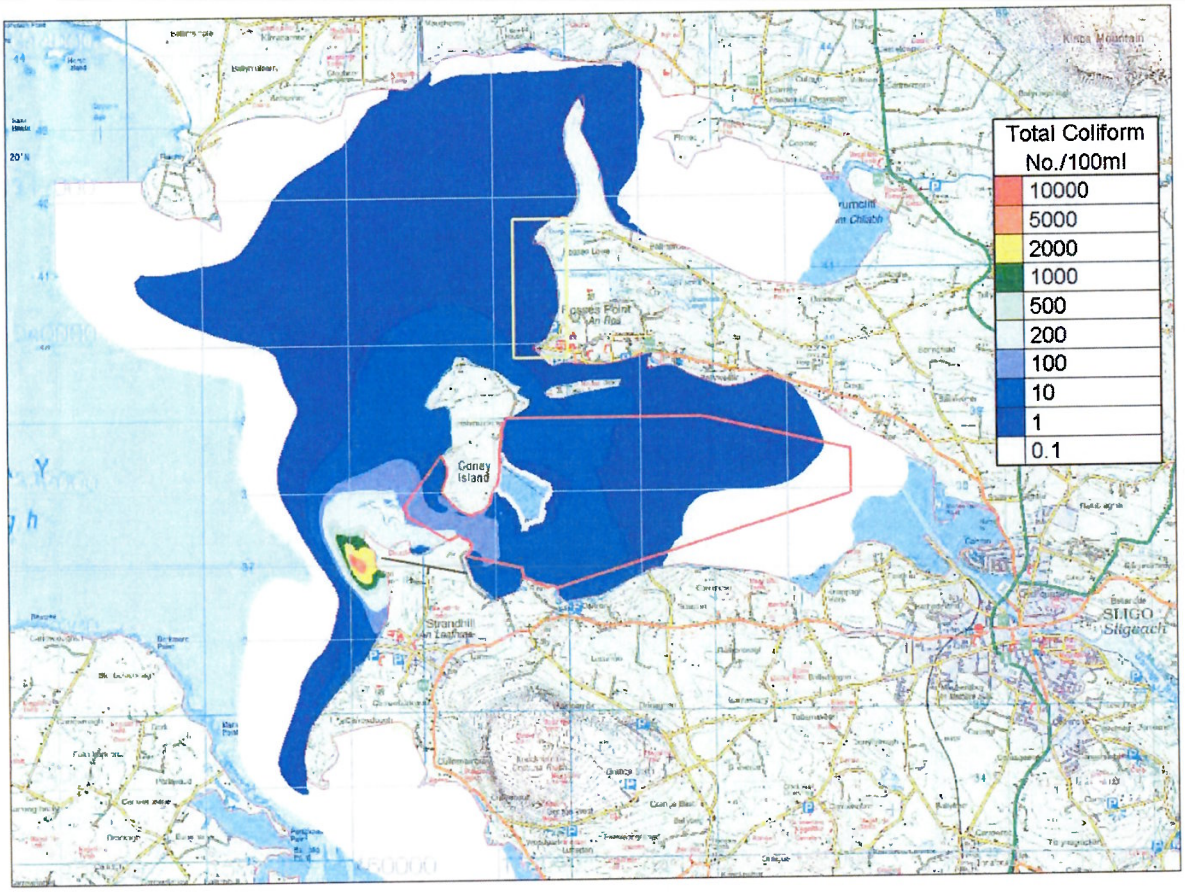


Figure 4.3: Tidal averaged total coliform concentrations for outfall option 1 and treated effluent of 1.0E+07 No./100ml.

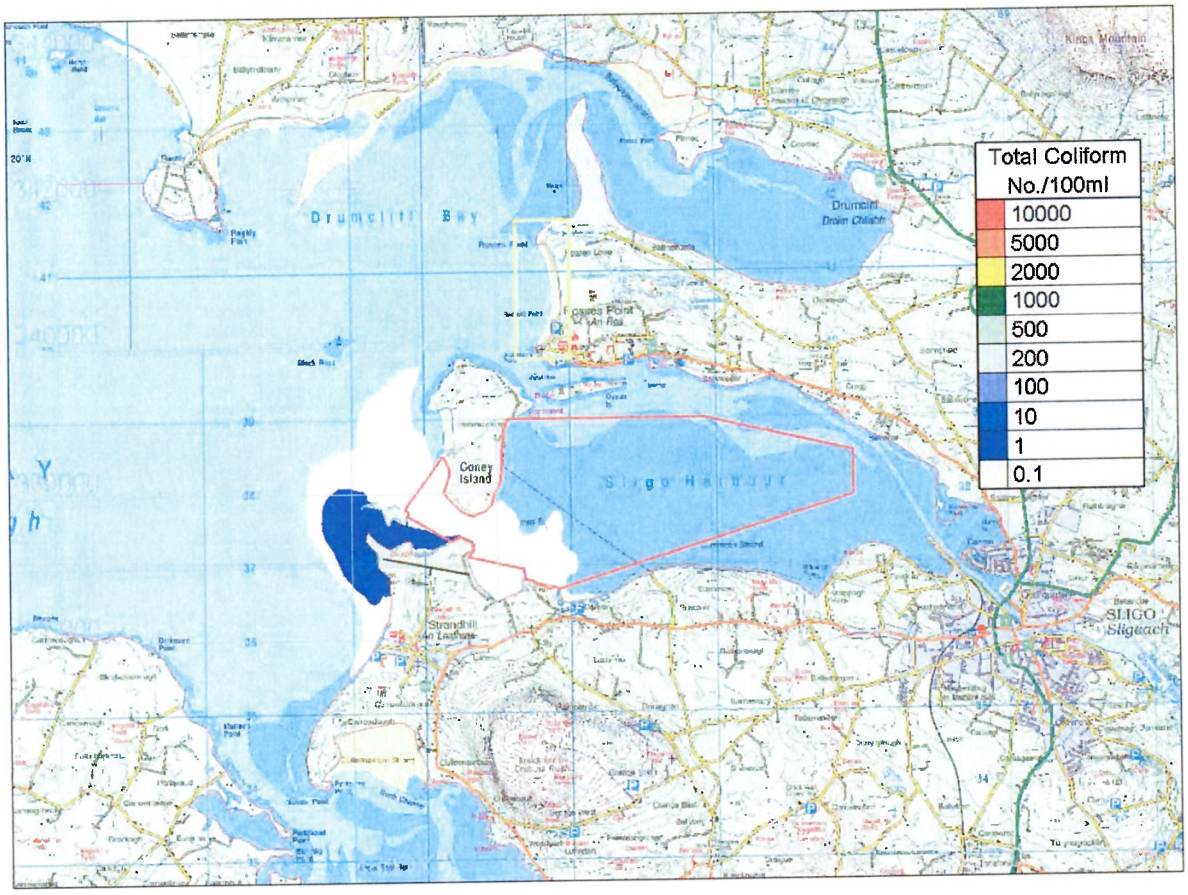


Figure 4.4: Maximum total coliform concentrations for outfall option 1 and treated effluent of 1.0E+04 No./100ml (with disinfection)

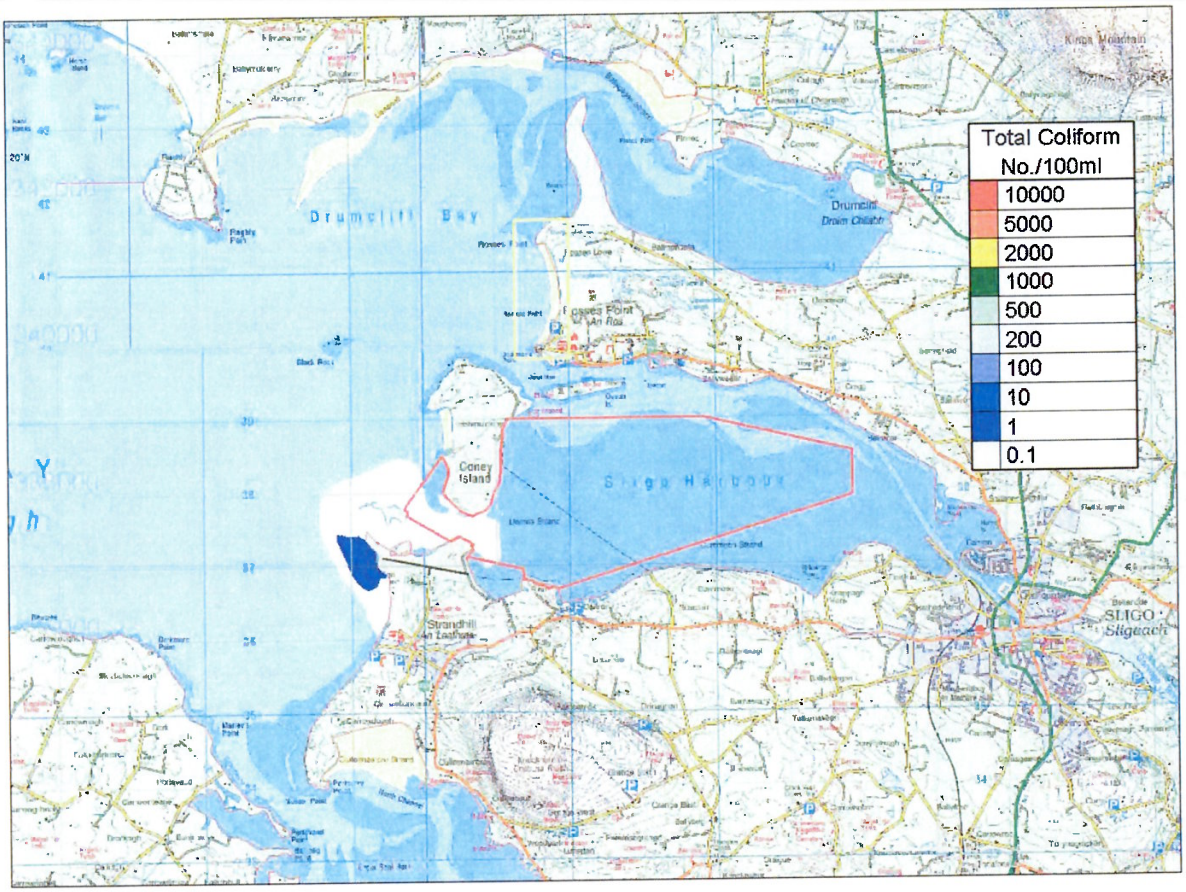


Figure 4.5: Tidal averaged total coliform concentrations for outfall option 1 and treated effluent of 1.0E+04 No./100ml (with disinfection)

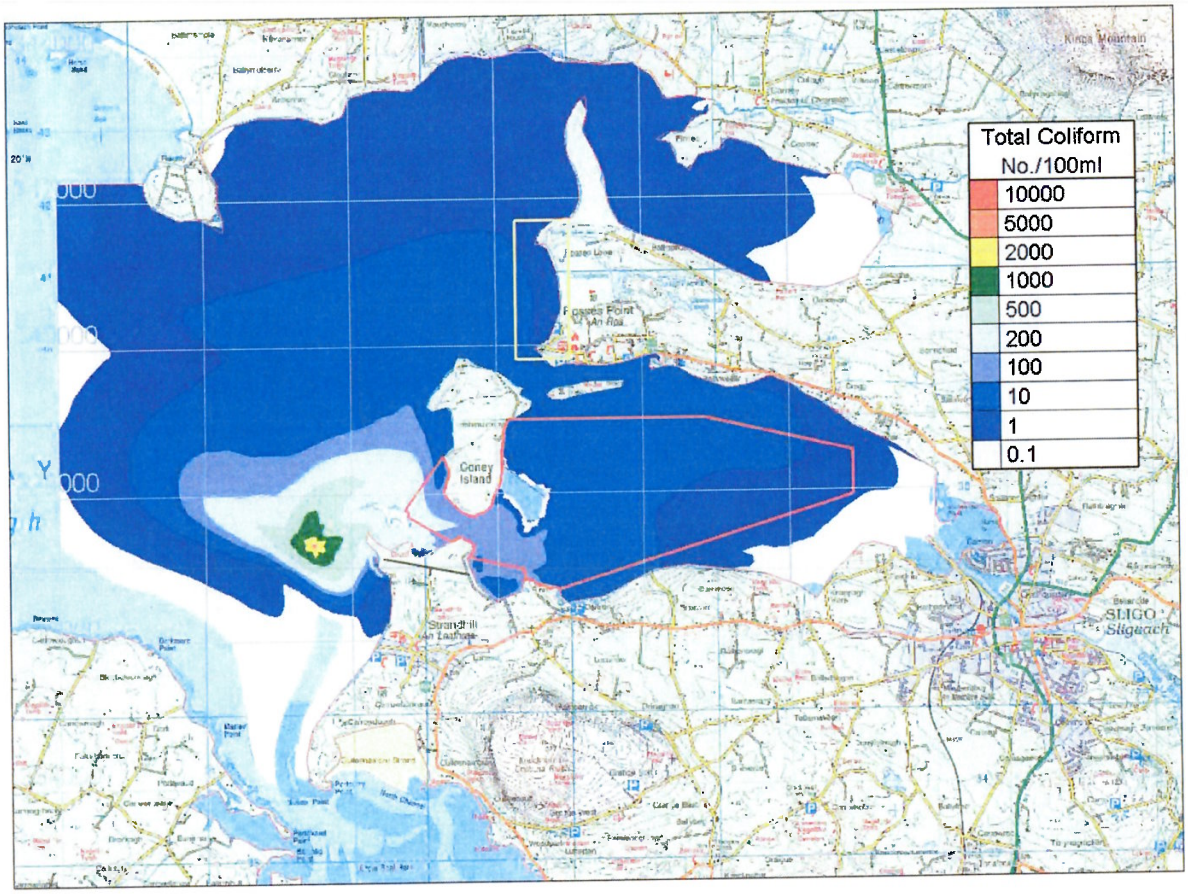


Figure 4.6: Total coliform concentrations for outfall option 2 and treated effluent of 1.0E+07 No./100ml

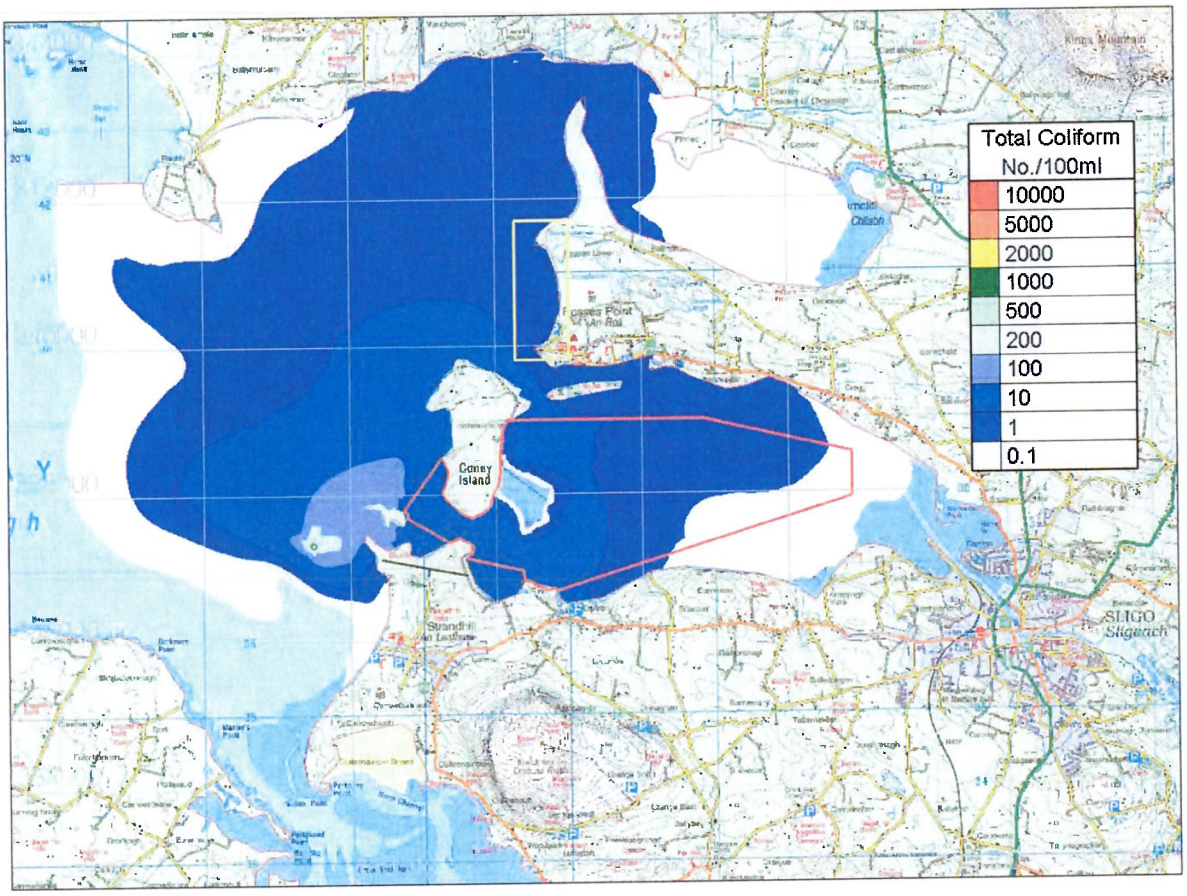


Figure 4.7: Tidal averaged total coliform concentrations for outfall option 2 and treated effluent of 1.0E+07 No./100ml

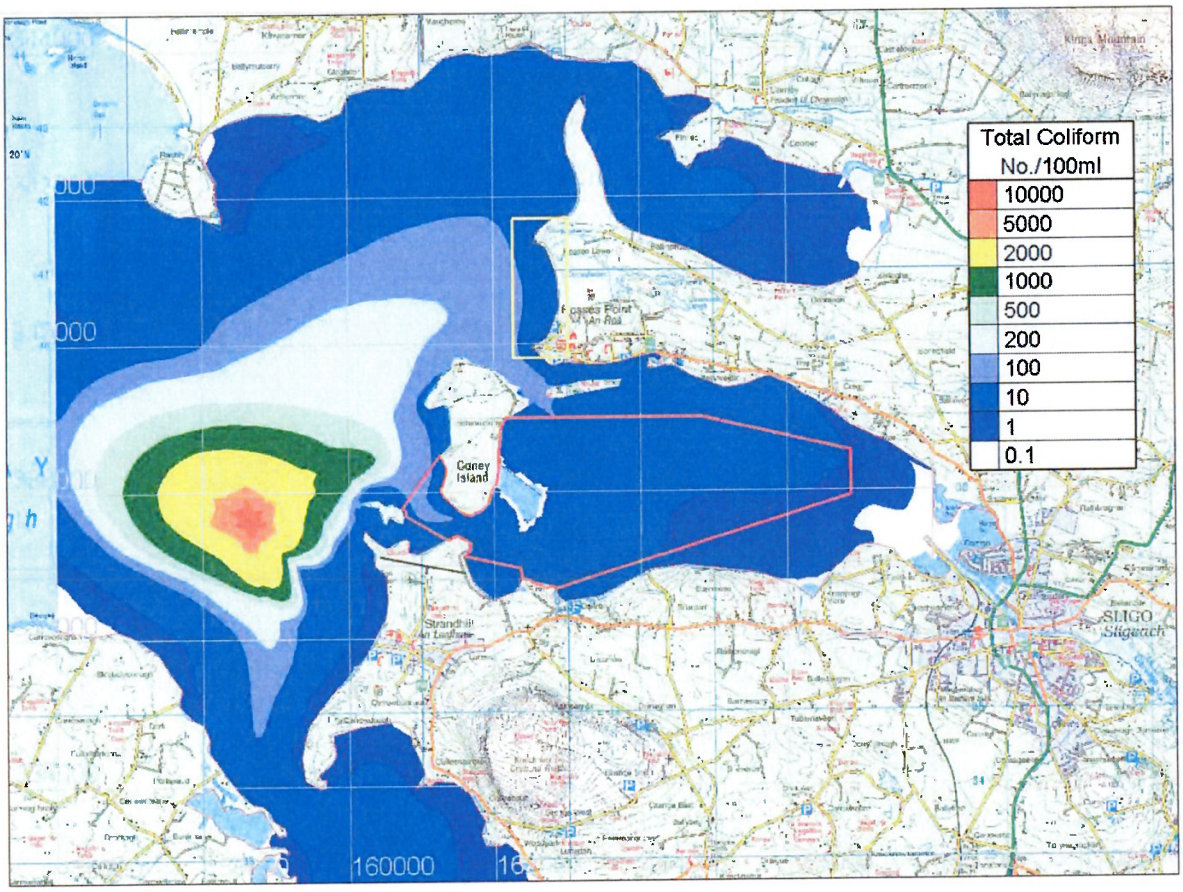


Figure 4.8: Maximum total coliform concentrations for outfall option 3 and treated effluent of 1.0E+08 No./100ml

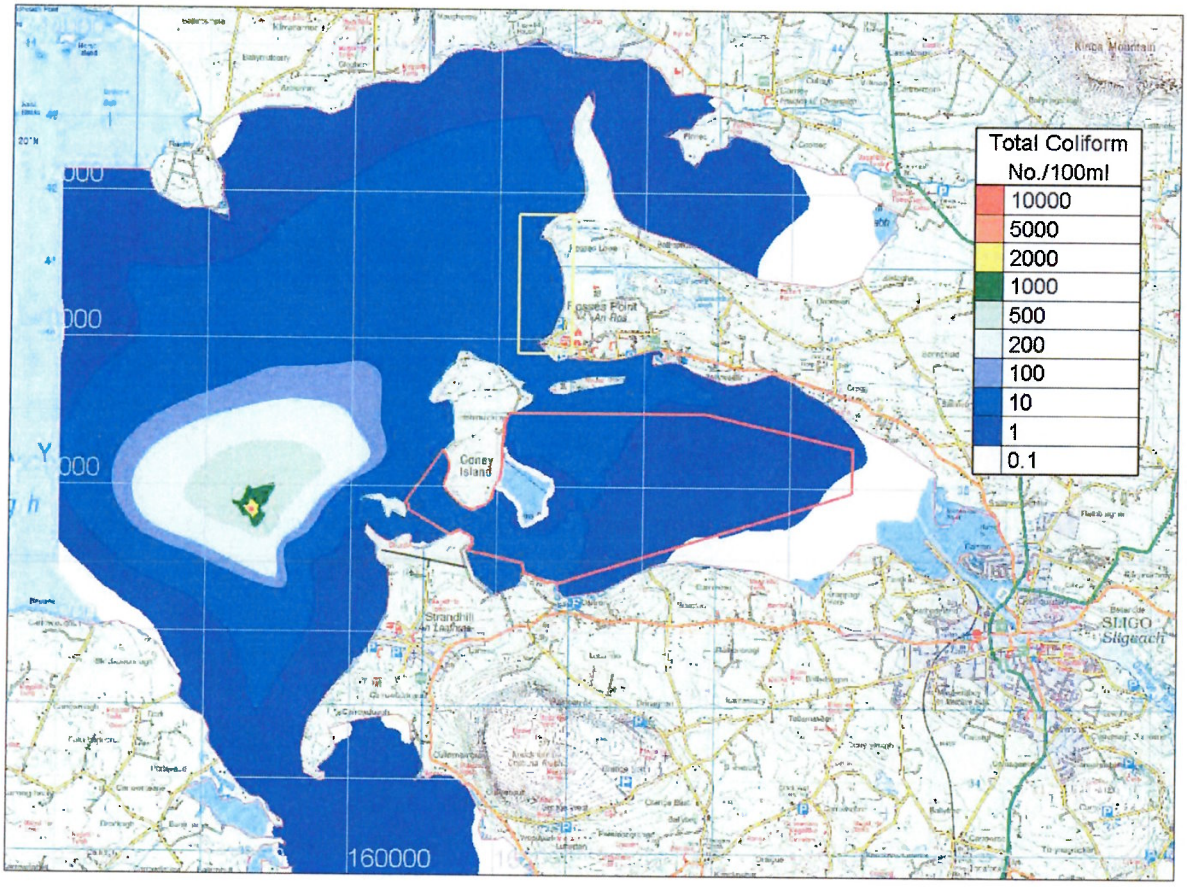


Figure 4.9: Tidal averaged total coliform concentrations for outfall option 3 and treated effluent of 1.0E+08 No./100ml

4.3. DIN Simulations

Four simulation runs for Dissolved Inorganic Nitrogen (DIN) were carried out for the three outfall option sites and varying levels of treatment (8.5 mgN/l outfall option 1, 40mgN/l outfall option 1 and 2 and 50 mgN/l outfall option 3).

The simulations were run for a lunar month which provided sufficient time for equilibrium concentrations to build up within the inner bay areas. The simulations were carried out independent of ambient background concentrations. Tables 4.6 to 4.9 present summary statistics of predicted DIN concentrations over the spring-neap cycle and Figures 4.10 to 4.17 present maximum and mean DIN concentration contour plots within the study area for the four model runs.

The model results clearly show that DIN concentrations for all four options will not affect the EQS status of the receiving water body with concentrations extremely low even in the vicinity of the outfalls themselves. Only trace levels of DIN are predicted within the inner bay areas of Ballysadare, Sligo Harbour and Drumcliff.

APPENDIX VII: DR. EVELYN MOORKENS REPORT ON IMPACT OF PROPOSED UPGRADE WORKS ON *Vertigo angustior*

SURVEY AND ASSESSMENT OF PROPOSED WASTE WATER TREATMENT WORKS UPGRADE AT STRANDHILL, COUNTY SLIGO ON *VERTIGO ANGUSTIOR*

August 2013

Evelyn A. Moorkens

Contact Address:

53, Charleville Square,
Rathfarnham,
Dublin 14, Ireland.

Tel: 353 1 4948500 Mob: 353 86 8211385

e-mail: emoorkens@eircom.net

1.0 Introduction

A molluscan survey was undertaken in the area both inside and outside the fence surrounding Strandhill Sewage Treatment Works and Strandhill Caravan Park Pumping Station. The sewage treatment works area is an exclusion from within the Cummeen Strand / Drumcliff Bay SAC (00627) (revised drawing), and the Strandhill caravan park area is to the south of the same SAC, and to the north of the Ballysadare Bay SAC (00622) which are both designated for the Annex II snail species *Vertigo angustior* as well as a variety of Annex I habitats.

The aim of the survey is to look for the presence or absence of the snail in the immediate area around and in front of the current fenced works area and the pumping station area, and to consider the results with respect to the potential impact of the upgrade works proposed in these works areas.

The survey was carried out on 12th August 2013.

2.0 Methodology

The area within and around the Strandhill WWTP works compound was walked and visually assessed for quality of fixed and semi-fixed dune habitat with respect to its value for *Vertigo angustior*. The assessment was made with comparison to a baseline survey undertaken in 2009 for the coastal protection project undertaken in the area (Moorkens, 2009). The presence of *V. angustior* was checked by banging living vegetation and litter onto a white tray, removing the vegetation and looking at the residue remaining in the tray under a 10X and 20X magnifying lens and noting the presence or absence of the species. The potential habitat around the pumping station area was checked in the same manner.

3.0 Results

3.1 Strandhill WWTP works surroundings

Figure 1 shows 8 polygon areas of habitat importance, which were determined for the 2009 survey (Moorkens, 2009). Polygons 3, 5 and 6 were found to be of the highest quality optimum habitat for *Vertigo angustior* in 2009, and they remain so in 2013 as found in the present survey. The 8th polygon is a dune slack habitat where *V. angustior* was not found, but has a very high botanical quality. The survey found that polygon 7 is recovering following its use as a track during the coastal protection project (Photo1), with *V. angustior* present where habitat was least disturbed. Polygon 4 is of lower value for the snail, although it is present in places. The vegetation is somewhat rank and disturbed which lowers its value compared with the other polygons. Polygon 5 adjacent to it is of high value for the snail (Photo 2).

In all, 23 samples out of 27 were positive for *V. angustior*.



Figure 1. Area showing areas of *V. angustior* habitat present



Photo 1 Polygon 7 recovering habitat



Photo 2. Polygon 5 looking back to Polygon 4

3.2 Strandhill WWTP works area

Within the Strandhill WWTP fenced area there is a grassed area of approximately 70m long and 22m wide, within which the new waste water treatment system is planned and needs to be commissioned in advance of the existing area being decommissioned.

This grassed area has been managed by mowing and does not constitute habitat for *V. angustior*, and no specimens of the species were found there (Photos 3 and 4).



Photo 3 Grass in Strandhill WWTP compound



Photo 4 Grass in Strandhill WWTP compound

3.3 Strandhill caravan park pumping station area

This area consisted of the current pumping station works, and was bounded to the west by a short strip of semi-fixed dune and beach (Photo 5), to the south by a built and disturbed environment (Photo 6) and to the east and north by disturbed and mown grass for caravans interspersed by more natural dune mounds (Photos 7 and 8). *Vertigo angustior* was not found in the 8 samples assessed in the field, and potential habitat was sparse.



Photo 5 Pumping station area looking west



Photo 6 Built environment to the south



Photo 7 Disturbed environment to the north



Photo 8 Disturbed environment to the east

4.0 Discussion

The rare narrow-mouthed whorl snail *Vertigo angustior* grows to less than 2mm in height. Sites where the species is widespread, especially those where a variety of suitable habitats and wetness conditions occur within the one general site, such as at the Cummeen Strand / Drumcliff Bay SAC (00627) and at the Ballysadare Bay SAC (00622) are of high international importance. The snail remains threatened internationally and in Ireland (Moorkens, 2006; Byrne *et al.*, 2009). Both SAC populations were assessed for status as part of a national monitoring scheme in 2010 and were found to be in favourable condition (Moorkens & Killeen, 2011).

The area between the fenced sewage treatment works and the sea remains of the highest quality optimum habitat for *Vertigo angustior*, within a wider SAC that is of high international importance for this species.

Strandhill sewage treatment works require upgrade. Strandhill is currently served by a 1,500 PE extended aeration WWTW which was constructed in 1992. The current plant is overloaded and not providing full secondary treatment of the influent wastewater. The plant discharges to the sea at Killaspug via an outfall pipe. The primary discharge from the existing WWTW is located outside but near to the Cummeen Strand/Drumcliff Bay SAC/SPA boundary. It is an objective in the Sligo County Development Plan 2011-2017 to carry out measures to address deficiencies in the existing water and wastewater infrastructure, so as to ensure compliance with regulatory requirements and the objectives of the Water Framework Directive.

The improvements will require a new facility at Strandhill, to be procured under a design/build/operate (DBO) procedure. This form of procurement will allow the Contractor to propose any design which will treat the wastewater to the required performance standards. The works shall be designed to treat wastewater from Strandhill to a PE equivalent of 3,000.

The exact size and position of the units, and the exact process is to be decided by the contractor at the design stage. The contractor will be obliged to stay within the site boundary and its height restrictions and comply with the requirements of Part 8 Planning. Once the new works are operational, unused parts of the existing plant are to be demolished and removed from the site for disposal.

As part of the scheme, the pumping stations will require maintenance works within their site boundaries (e.g. pump replacement, electrical system upgrade). The West End (Caravan Park) pumping station, located along the coast west of Strandhill village, will require general maintenance works and the addition of a new storm tank with a capacity of 20 m^3 to provide storage for peak flows, a control kiosk and the mechanical upgrade of the current pumping station.

An assessment of the potential impact of the proposed works at the two sites can be divided into two aspects, 1) the direct impact on the areas where the works are proposed, and 2) the indirect impacts on habitats occurring outside the footprint of the proposed works.

1) Assessment of the direct impact on the areas where the works are proposed

As no habitat was found for *Vertigo angustior* at either inside the Strandhill WWTP compound, or within the footprint of the West End (Caravan Park) pumping station, no direct impacts on *V. angustior* are possible from the proposed works.

2) Assessment of the indirect impacts on habitats occurring outside the footprint of the proposed works.

Potential negative impacts from works on areas of habitat nearby could be caused by:

a) Drainage of an area nearby, resulting in a loss of water through overland or subsurface flow to the habitat outside the works.
b) Disturbance of topography or subsurface flow of an area nearby, causing a change of direction or quantity of subsurface water to the habitat outside the works.
c) Any in-combination or cumulative effect that could lead to disturbance of the hydrogeology of the habitat outside the works.

At the West End (Caravan Park) pumping station area, the surrounding habitat is fragmented and marginal, and the area within the zone of hydrogeological influence of the proposed works is outside any designated area. The potential adverse indirect effects from the proposed works to the pumping station influence are considered to be negligible.

The area surrounding the Strandhill WWTP compound is, by contrast, of very high conservation value and within the Cummeen Strand / Drumcliff Bay SAC (00627). The hydrogeology regime of the fixed dune and dune slack areas of the cSAC are maintained through surface and sub-surface flow through the porous sands and soils laid down over the Carboniferous limestone bedrock of the area. The area of the Strandhill WWTP compound is relatively flat and therefore the sands and soils are considered to be evenly distributed across the area, thus are likely to supply an even quantity of subsurface water to the surrounding area from the part of the site that is not currently built on.

The current operational area of the site is to be decommissioned after the proposed upgraded treatment plant is complete. In order to supply an equal amount of porous sand and subsoil to that which is present within the compound, all excavated material should be stockpiled within the compound, with care being taken to keep the sand and soil components separate, clean and covered during the period of construction. When the new works area is operational, the old machinery and tanks should be carefully removed, and the stockpiled sand and soil carefully placed in the cleared area, with the same soil and sand horizon profile as that which was removed for the construction. As modern treatment plant is generally smaller and more efficient than older plant, the full quantity of excavated matter should be available for use. No additional external fill should be allowed in this area.

It should be a condition of the contract to ensure that any design of the new system should be no bigger or deeper than the existing plant. The design, construction and operation of the new systems should be done in full knowledge of the sensitive cSAC that the compound sits within, and all aspects of the project need to document how they will be carried out with the protection of the structure and function of the surrounding habitats and species.

Where the above are conditions attached to the contract, it can be concluded that the hydrogeological system will have no net loss in the long term, that the temporary disturbance to the hydrogeological regime during construction will be minimal. The operational phase compound will be equal to the old one in terms of drainage and hydrogeological support, and thus will not contribute any in-combination or cumulative effects. Therefore the long term effect on the Vertigo angustior population of the proposed works can be considered to be negligible.

5.0 References

Byrne, A., Moorkens, E.A., Anderson, R., Killeen, I.J. & Regan, E.C. (2009) *Ireland Red List No. 2 – Non-Marine Molluscs.* National Parks and Wildlife Service, Department of the Environment, Heritage and Local Government, Dublin, Ireland.

Moorkens, E. A. (2006). Irish non-marine molluscs – an evaluation of species threat status. *Bull. Ir. biogeog. Soc.* 30, 348-371.

Moorkens, E. A. (2009). *A non-marine molluscan survey of dune habitat in the vicinity of Strandhill sewage treatment works, County Sligo.* Report for Sligo County Council.

Moorkens, E.A. & Killeen, I.J. (2011) Monitoring and Condition Assessment of Populations of *Vertigo geyeri*, *Vertigo angustior* and *Vertigo moulinsiana* in Ireland. *Irish Wildlife Manuals*, No. 55. National Parks and Wildlife Service, Department of Arts, Heritage and Gaeltacht, Dublin, Ireland.

APPENDIX VIII: HYDRODYNAMIC MODEL

Table 4.6: Predicted DIN concentrations at reference sites for outfall option 1 (Site A) with final DIN effluent concentration of 8.5mg/l

Sites	A	1	2	3	4	5	6
Average	1.769E-02	6.431E-04	4.544E-04	2.978E-04	2.687E-04	2.481E-04	8.904E-06
Median	1.286E-02	6.418E-04	4.271E-04	2.856E-04	2.561E-04	2.377E-04	8.484E-06
Maximum	5.073E-02	1.108E-03	7.658E-04	5.037E-04	4.013E-04	3.776E-04	2.012E-05
Minimum	3.181E-03	2.340E-04	2.675E-04	1.744E-04	1.998E-04	1.519E-04	3.481E-06
Sites	7	8	9	10	11	12	
Average	5.575E-06	2.492E-04	2.073E-04	1.736E-04	2.199E-04	2.201E-04	
Median	5.502E-06	2.451E-04	2.107E-04	1.715E-04	2.145E-04	2.129E-04	
Maximum	4.112E-04	4.112E-04	3.441E-04	2.803E-04	2.822E-04	2.822E-04	
Minimum	3.854E-08	1.133E-04	8.962E-05	9.475E-05	1.779E-04	1.842E-04	

Table 4.7: Predicted DIN concentrations at reference sites for outfall option 1 (Site A) with final DIN effluent concentration of 40.0mg/l

Sites	A	1	2	3	4	5	6
Average	8.32E-02	3.03E-03	2.14E-03	1.40E-03	1.26E-03	1.17E-03	4.19E-05
Median	6.05E-02	3.02E-03	2.01E-03	1.34E-03	1.21E-03	1.12E-03	3.99E-05
Maximum	2.39E-01	5.21E-03	3.60E-03	2.37E-03	1.89E-03	1.78E-03	9.47E-05
Minimum	1.50E-02	1.10E-03	1.26E-03	8.21E-04	9.40E-04	7.15E-04	1.64E-05
Sites	7	8	9	10	11	12	
Average	2.62E-05	1.17E-03	9.76E-04	8.17E-04	1.03E-03	1.04E-03	
Median	2.59E-05	1.15E-03	9.92E-04	8.07E-04	1.01E-03	1.00E-03	
Maximum	1.94E-03	1.94E-03	1.62E-03	1.32E-03	1.33E-03	1.33E-03	
Minimum	1.81E-07	5.33E-04	4.22E-04	4.46E-04	8.37E-04	8.67E-04	

Table 4.8: Predicted DIN concentrations at reference sites for outfall option 2 (Site B) with final DIN effluent concentration of 40.0mg/l

Sites	B	1	2	3	4	5	6
Average	1.253E-02	1.421E-03	1.345E-03	1.020E-03	9.539E-04	8.972E-04	2.581E-06
Median	1.161E-02	1.263E-03	1.194E-03	9.534E-04	9.068E-04	8.328E-04	2.255E-06
Maximum	2.952E-02	2.732E-03	2.419E-03	1.864E-03	1.600E-03	1.484E-03	5.761E-06
Minimum	4.846E-03	5.911E-04	6.918E-04	6.466E-04	6.703E-04	5.411E-04	1.155E-06
Sites	7	8	9	10	11	12	
Average	1.971E-06	9.182E-04	8.086E-04	6.943E-04	8.412E-04	8.430E-04	
Median	1.977E-06	8.765E-04	7.611E-04	6.522E-04	8.239E-04	8.177E-04	
Maximum	1.604E-03	1.604E-03	1.363E-03	1.112E-03	1.126E-03	1.126E-03	
Minimum	2.349E-07	5.553E-04	4.944E-04	4.187E-04	6.667E-04	6.965E-04	

Table 4.9: Predicted DIN concentrations at reference sites for outfall option 3 (Site C) with final DIN effluent concentration of 50.0mg/l

Sites	C	1	2	3	4	5	6
Average	9.233E-03	1.874E-04	2.313E-04	3.974E-04	4.261E-04	4.088E-04	6.311E-05
Median	8.580E-03	1.798E-04	2.288E-04	3.920E-04	4.123E-04	3.974E-04	5.814E-05
Maximum	2.708E-02	3.146E-04	6.480E-04	6.480E-04	6.400E-04	5.263E-04	1.469E-04
Minimum	3.882E-03	1.132E-04	1.632E-04	2.944E-04	3.465E-04	2.398E-04	2.730E-05
Sites	7	8	9	10	11	12	
Average	4.889E-05	4.661E-04	5.231E-04	5.005E-04	4.898E-04	4.815E-04	
Median	4.840E-05	4.475E-04	4.906E-04	4.854E-04	4.765E-04	4.704E-04	
Maximum	8.780E-04	9.078E-04	9.078E-04	6.712E-04	6.304E-04	5.950E-04	
Minimum	5.463E-06	3.451E-04	3.813E-04	3.860E-04	4.174E-04	3.682E-04	

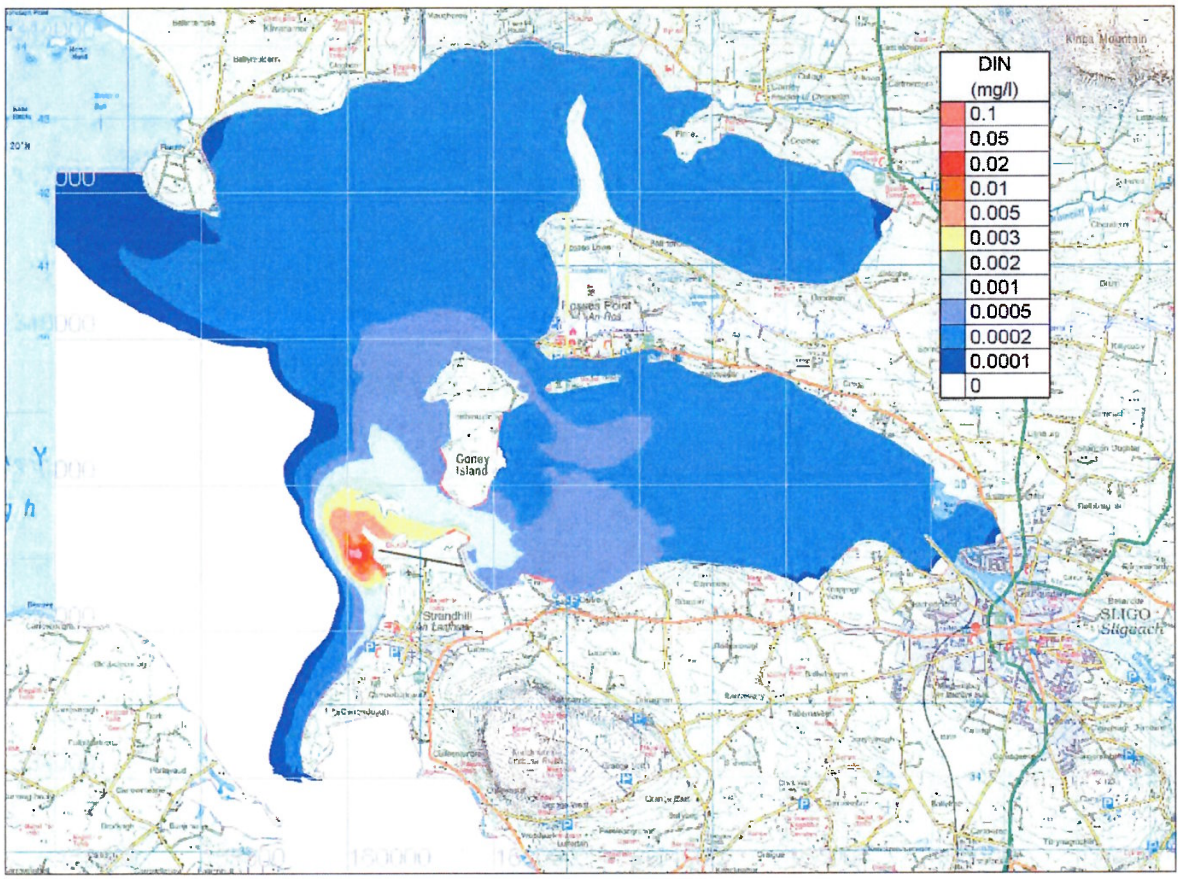


Figure 4.10: Maximum DIN concentrations for outfall option 1 and treated effluent of 8.5 mg/l DIN as N

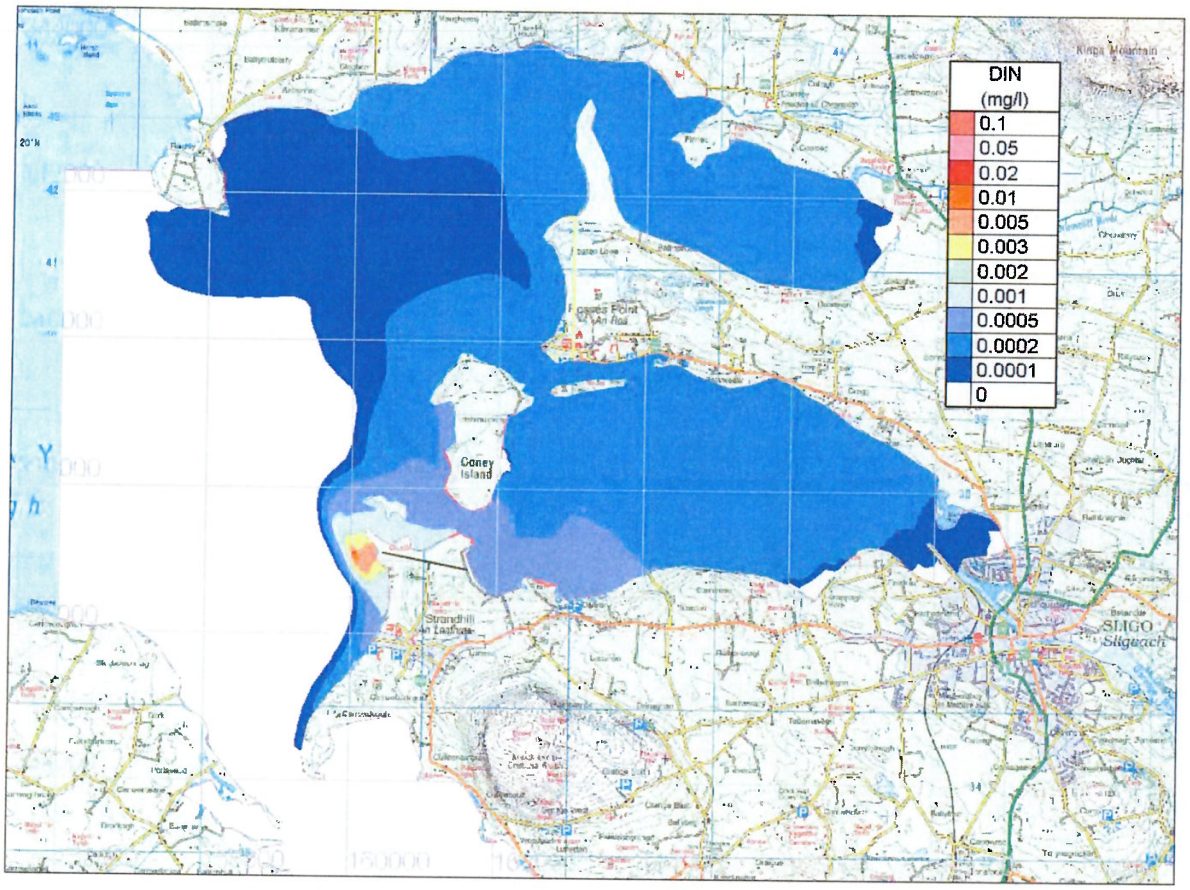


Figure 4.11: Tidal averaged DIN concentrations for outfall option 1 and treated effluent of 8.5 mg/l DIN as N

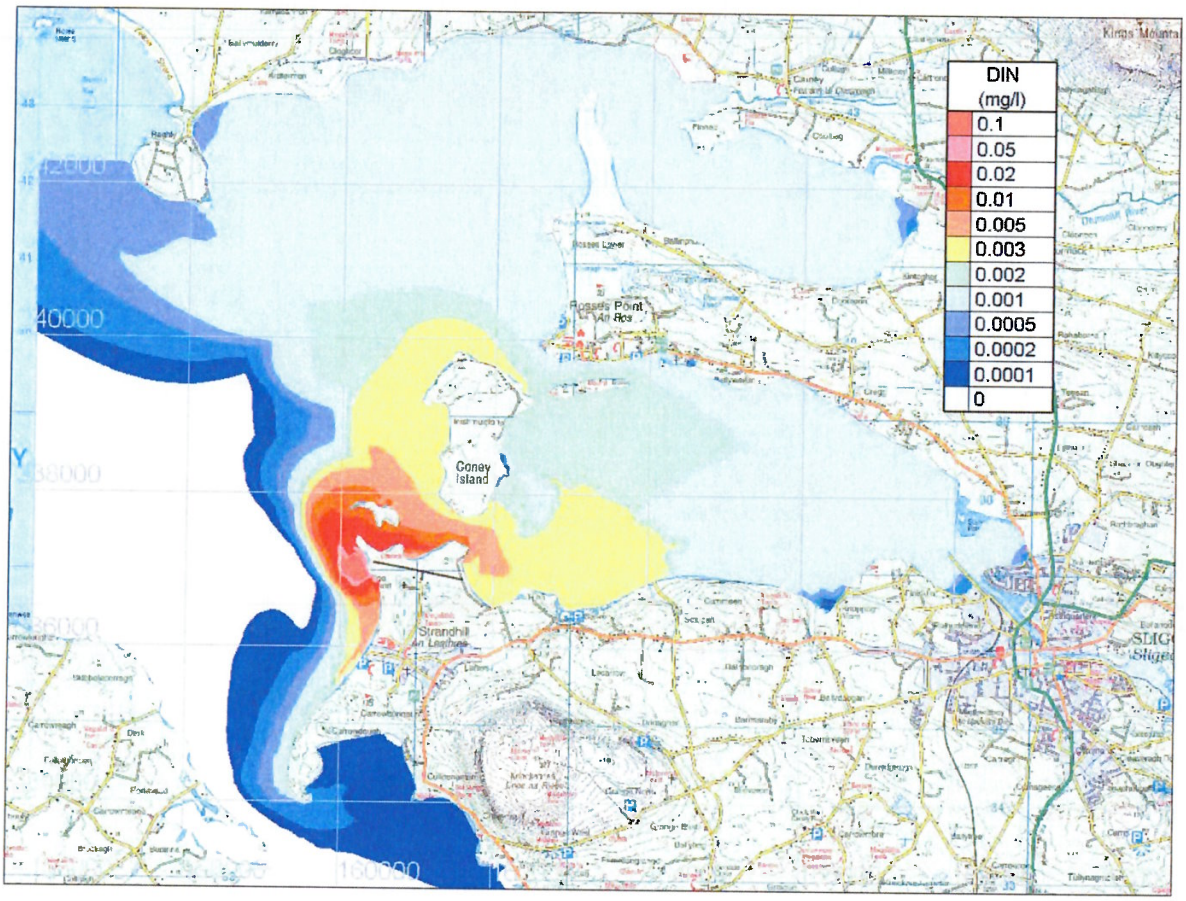


Figure 4.12: Maximum DIN concentrations for outfall option 1 and treated effluent of 40mg/l DIN as N

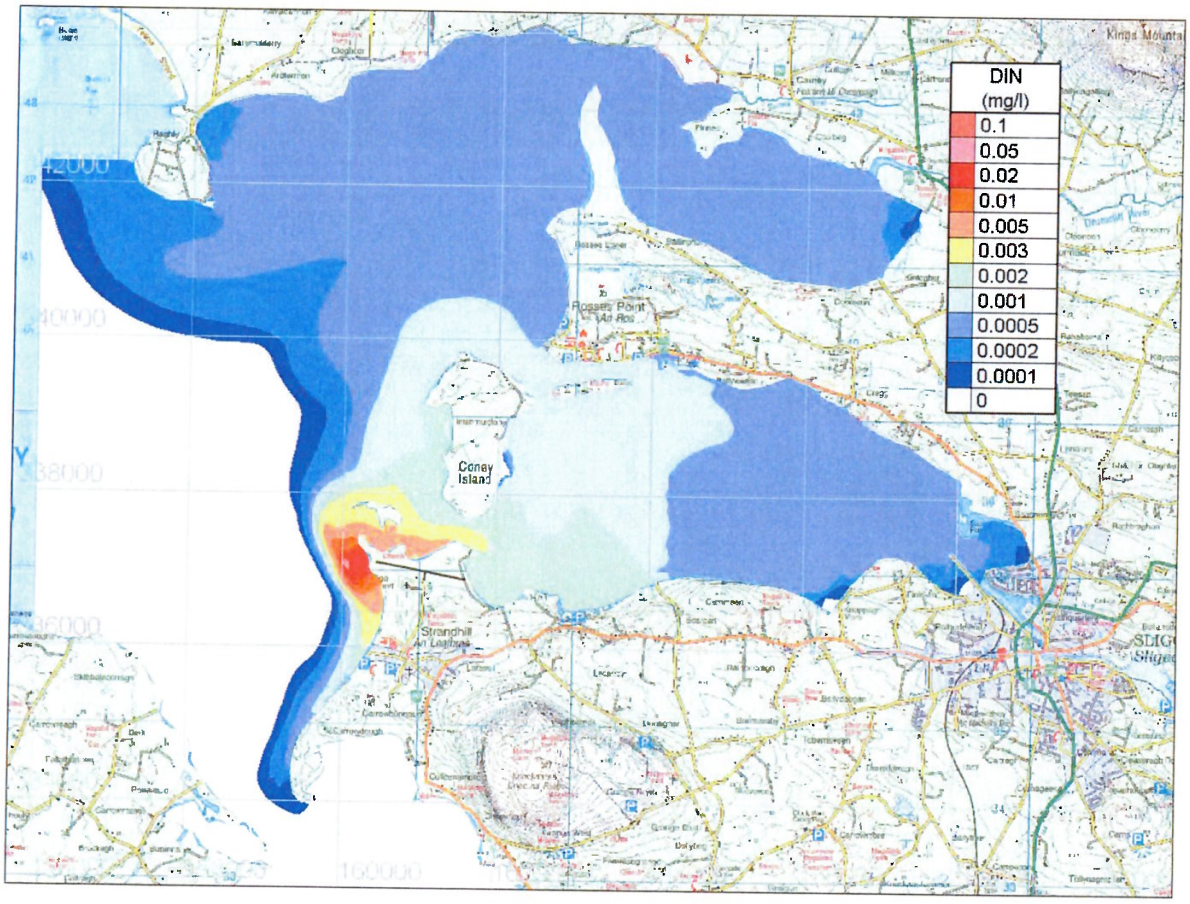


Figure 4.13: Tidal averaged DIN concentrations for outfall option 1 and treated effluent of 40mg /l DIN as N

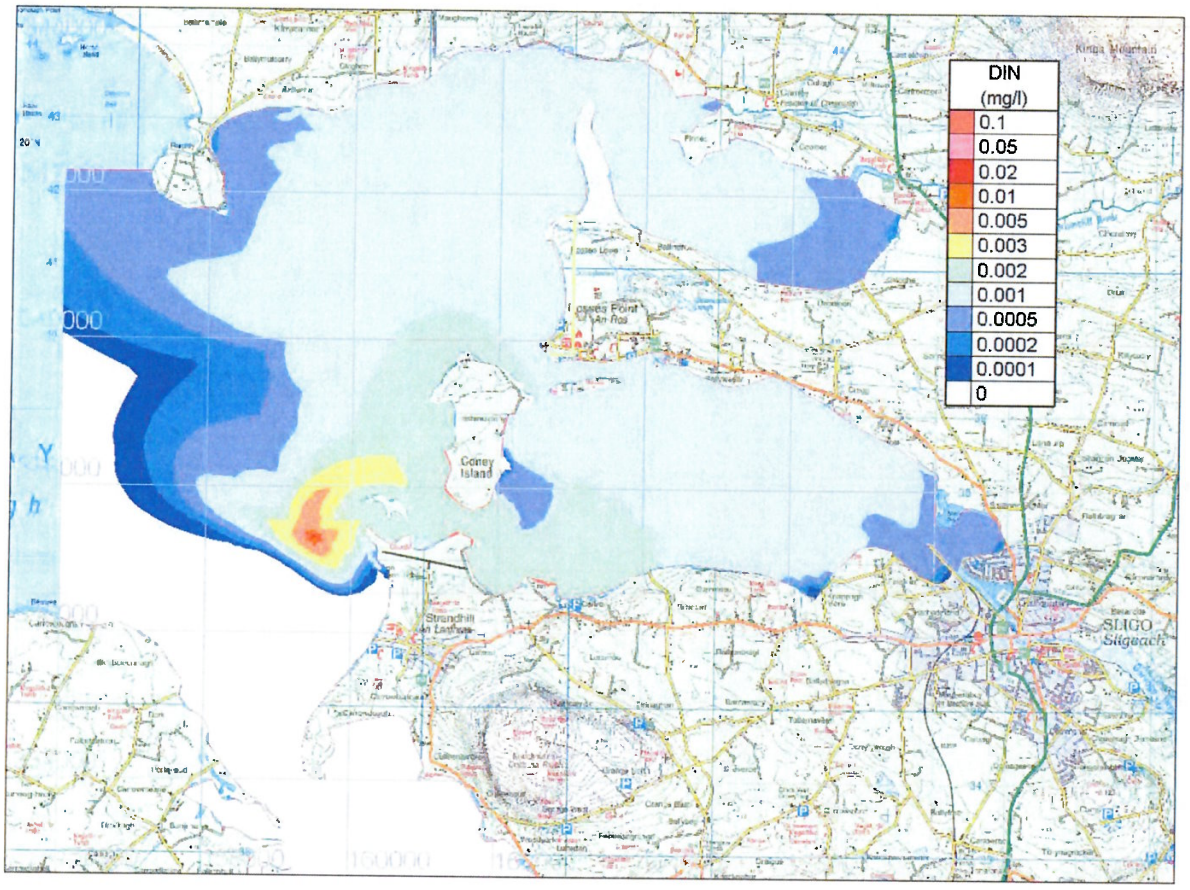


Figure 4.14: Maximum DIN concentrations for outfall option 2 and treated effluent of 40mg/l DIN as N

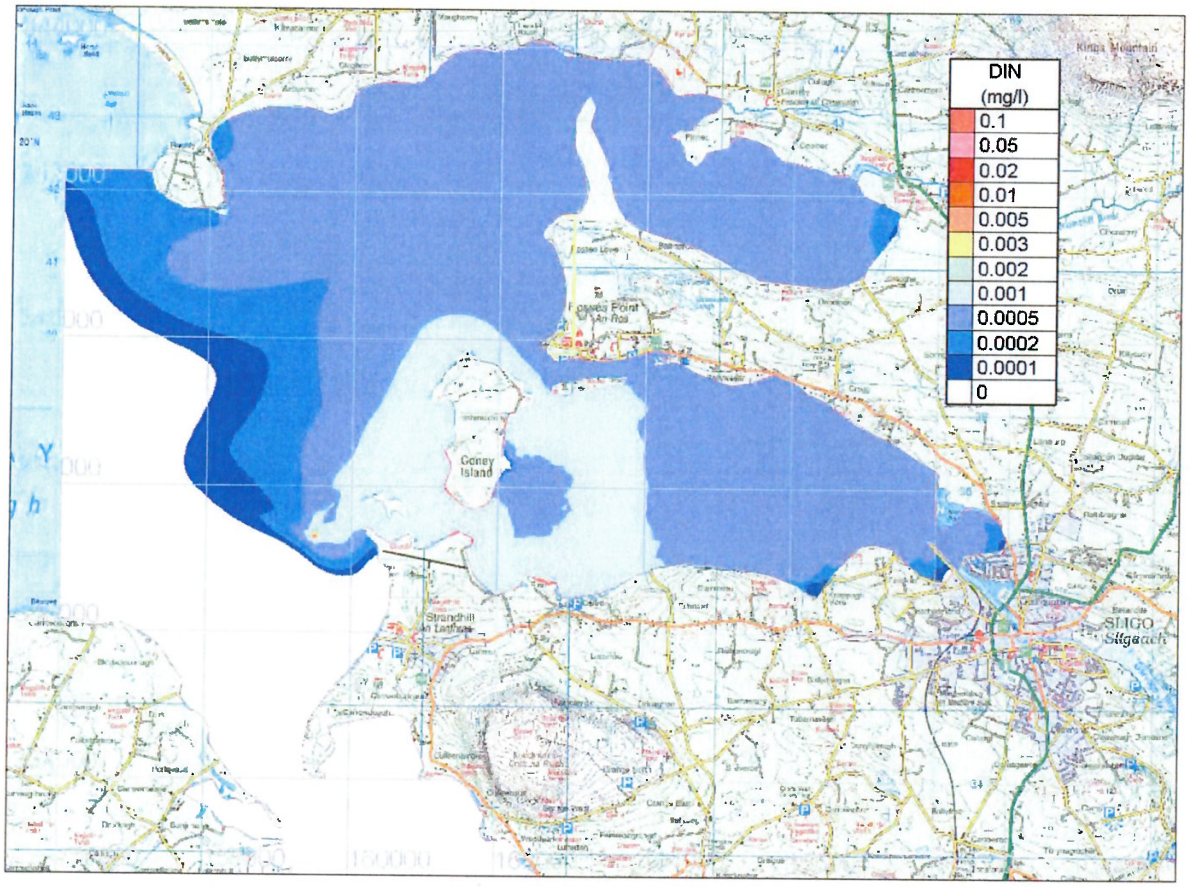


Figure 4.15: Tidal averaged DIN concentrations for outfall option 2 and treated effluent of 40mg/l DIN as N

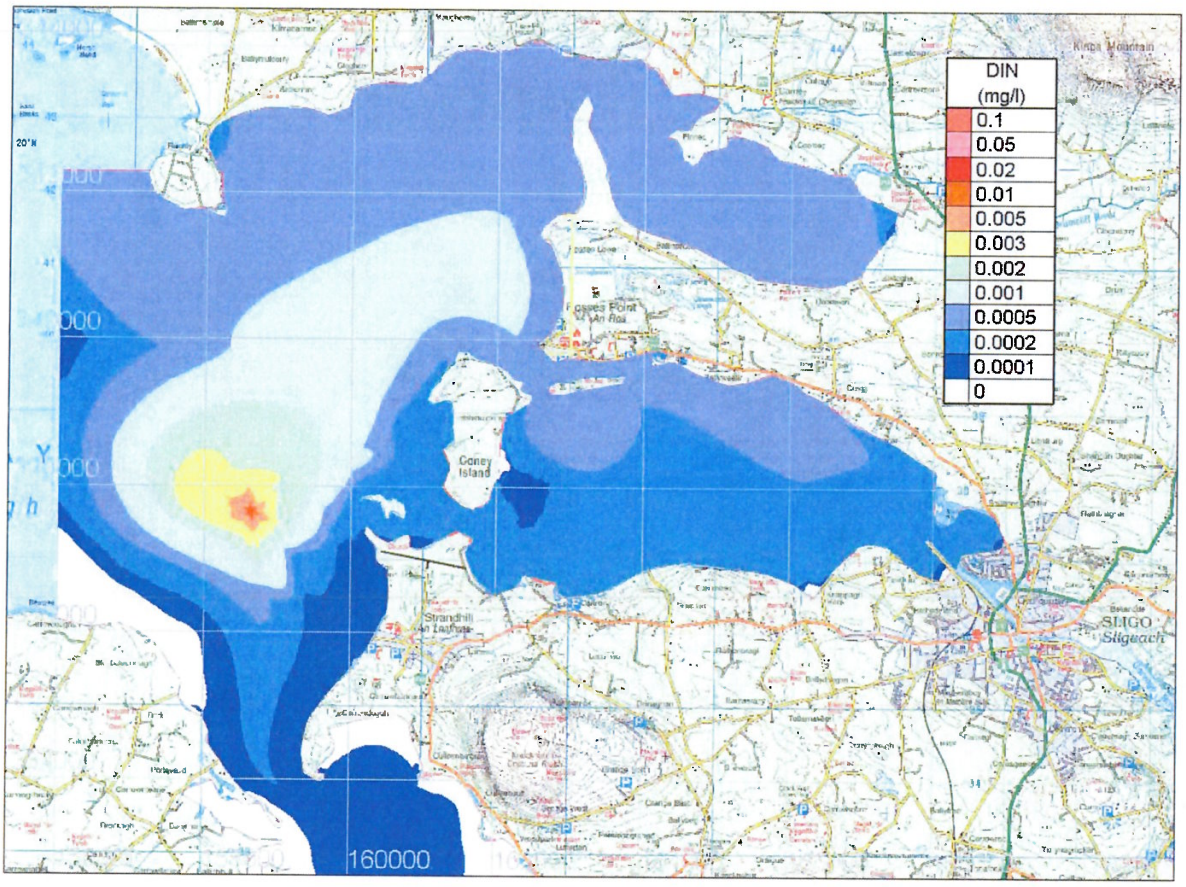


Figure 4.16: Maximum DIN concentrations for outfall option 3 and treated effluent of 50mg/l DIN as N

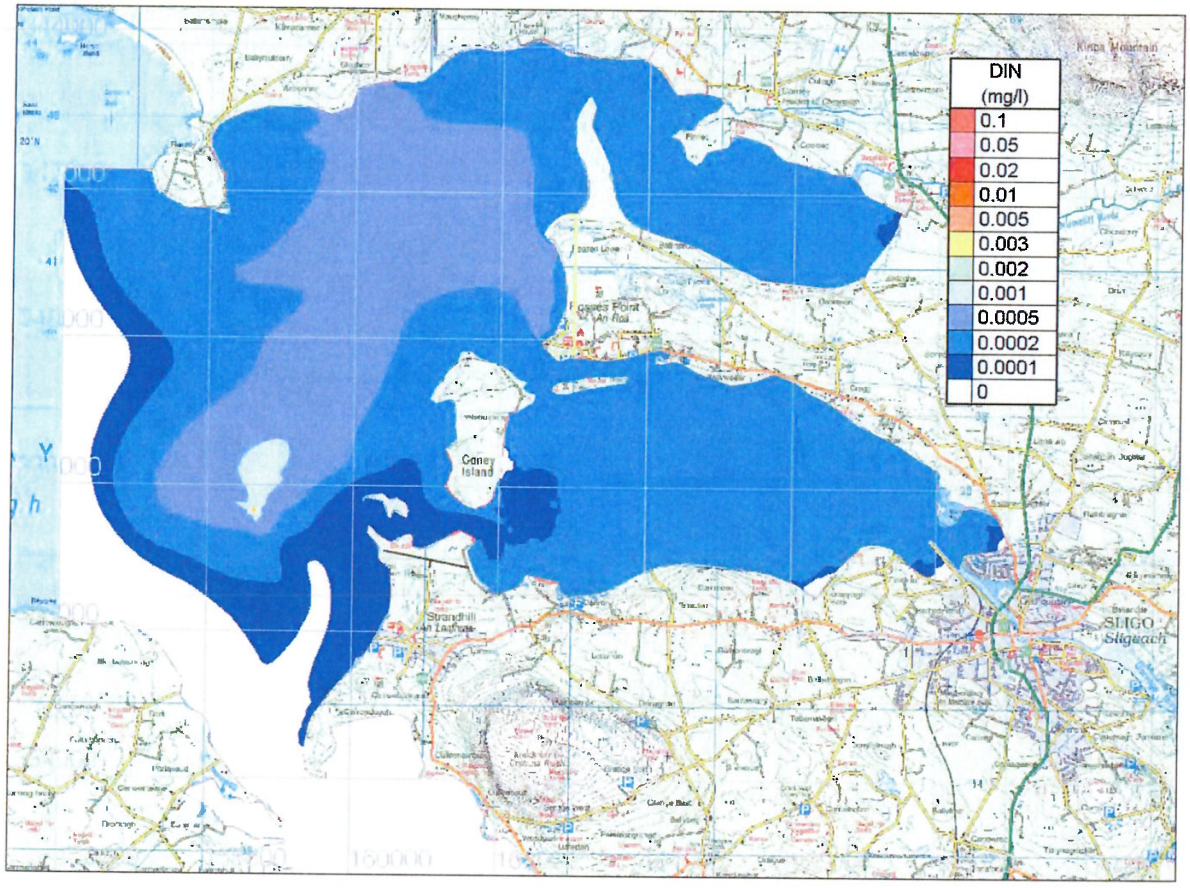


Figure 4.17: Tidal averaged DIN concentrations for outfall option 3 and treated effluent of 50mg/l DIN as N

5. Conclusion

The hydrodynamic dispersion simulations for the three outfall sites show that in respect to DIN the impact is minimal and easily falls well within the surface water regulations for "Good" status waters relating to DIN. The simulations show that even for the shallower nearshore outfall option 1, specific nitrogen removal will not be required with a normal secondary treated effluent standard of 40 DIN suitable. The impact to Ballysadare Bay, Sligo Harbour and Drumcliff Bay is shown to be negligible and will not affect the status of these bays in respect to DIN concentration and nutrient enrichment.

The total coliform simulations show high concentrations in the immediate vicinity of the outfalls for secondary treated effluent. However, such concentrations are shown to dramatically reduce with distance from the outfall. Secondary treated effluent from any of the outfall options will result in a moderate impact to the shellfish waters of Sligo Harbour and minor impact to the Blue flag bathing area at Rosses Point. Given the sensitivity of these waters as shellfish and Blue Flag bathing waters such a water quality impact by potential bacterial contamination is not considered tolerable. The treatment option of UV disinfection with a

Log4 reduction at outfall option 1 is shown to achieve the desired standard of imperceptible impact within the shellfish and bathing areas.

The recommendation is for a secondary treated effluent discharging at outfall option 1 with disinfection to significantly reduce bacteriological levels. Specific nitrogen removal in the treatment process will not be required. Other water quality parameters such as BOD and suspended solids will result in a negligible increase in ambient concentrations in the receiving waters.

Summerstrand / Druncliffe Bay SAC Conservation Objectives August 2013

placed in the northern section failed and none of the seven in the southern part of Strandhill failed.

Table 133C Conservation status of Annex I sand dune habitats at Strandhill

Habitat[1]	EU Conservation Status Assessment			Overall EU conservation status assessment	Proposed Irish conservation status system[2]
	Favourable	Unfavourable - Inadequate	Unfavourable - Bad		
Fixed Dunes (H2130)		Extent, Structure & Functions, Future prospects		Unfavourable-inadequate	**Unfavourable-declining**
Dunes with *Salix repens* (H2190)	Structure& Functions	Extent, Future prospects		Unfavourable-inadequate	**Unfavourable-declining**
Dune Slack (H2170)		Extent, Structure & Functions, Future prospects		Unfavourable-inadequate*	**Unfavourable-declining**
Mobile Dunes (H2120)		Extent, Structure & Functions, Future prospects		Unfavourable-inadequate	**Unfavourable-declining**
Embryonic Dunes (H2110)	Extent, Structure & Functions, Future prospects			Favourable	**Favourable-maintained**
Perennial vegetation of stony banks (H1220)	Extent, Structure & Functions	Future prospects		Unfavourable-inadequate	**Unfavourable-unchanged**
Annual vegetation of strandlines (H1210)	Extent, Structure & Functions, Future prospects			Favourable	**Favourable-maintained**

[1]EU Codes as per Interpretation Manual
[2]Ratings are Favourable (Enhanced, Maintained, Recovered, Declining), Unfavourable (Recovering, Unchanged, Declining) and Destroyed (Partially destroyed, Completely destroyed and Unknown)
*This rating is based on best scientific judgement see text

Table 133D Pass/Fail results of moni torings topsfor Annex I sand dune habitats at Strandhill

	Monitoring stops		
Habitat	**Pass**	**Fail**	**Conservation status**
Fixed Dunes (H2130)	12	2	**Unfavourable-inadequate**
Dunes with *Salix repens* (H2190)	4	0	**Favourable**
Dune Slack (H2170)	0	1	**Unfavourable-inadequate**
Mobile Dunes (H2120)	5	1	**Unfavourable-inadequate**
Embryonic Dunes (H2110)	4	0	**Favourable**
Perennial vegetation of stonybanks (H1220)	3	0	**Favourable**
Annual vegetation of strandlines (H1210)	3	0	**Favourable**

The two monitoring stops that did not pass, failed to reach the target for the attributes of typical species, sward height and flowering and fruiting. This is mainly on account of undergrazing.

The Conservation Plan for cSAC Cumeen Drumcliff (the northern part of Strandhill) contains a strategy for the management of the coniferous plantation located on the fixed dunes. It states:

Following harvesting (which will be outside of the time frame of this conservation plan), the dune area should not be re-planted.

This strategy, if implemented will facilitate the restoration of this habitat. This Conservation Plan also states that the dunes will remain without active management unless monitoring indicates that a grazing regime is required. The results of the monitoring program as part of this project would indicate that a sustainable grazing regime should be implemented. The control of human induced erosion in the southern part of Strandhill is addressed in the Conservation Plan for the cSAC Ballysadare Bay. It states that if erosion becomes a problem, action will be taken entailing the use of boardwalks and limiting human access to the dunes. The issue of undergrazing in the south is not addressed in the Conservation Plan for cSAC Ballysadare Bay. Until the issues of undergrazing (in both the north and south of Strandhill) and human induced erosion are actively managed, the future prospects are considered *unfavourable-inadequate* (Table 133C).

Human Induced Erosion *

Northern part of Strandhill is wrong

None of the fixed dune areas of the cSAC 627 Cumeen Drumcliff (the northern part of Strandhill) are considered particularly good examples of this habitat type in NATURA 2000. The fixed dunes are given a rating of *average or reduced* conservation status. The fixed dunes in the southern part of the site (cSAC of Ballysadare Bay) are given a rating of *good* conservation status in NATURA 2000. Currently, the overall EU conservation status of the entire fixed dune habitat is *unfavourable – inadequate* (Table 133C). This is mainly due to undergrazing and human induced erosion.

Under the Irish scheme, the conservation status for fixed dune at this site is *unfavourable – declining*.

Dunes with *Salix repens* (2170)

The extent of the dunes with *Salix repens* is rated as *unfavourable–inadequate* (Table 133C). This is based on best scientific judgement as there is no previous information available on this habitat at Strandhill. It is largely confined to the north of the site. This habitat occurs in a mosaic with fixed dunes and dune plantation. It is likely that the presence of the plantation has affected the extent of this habitat.

The structure and functions parameter is rated as *favourable*. Four monitoring stops were placed in the dunes with *Salix repens* and all of these passed (Table 133D). However, it is important to note that these are trial monitoring stops for this habitat. Further studies are required for the development of targets for this habitat (See main report). The main threat to the structure and functions of this habitat is from undergrazing, but otherwise this habitat appears to be functioning well with a high diversity of species present.

The future prospects for this habitat are considered *unfavourable-inadequate.* Dunes with *Salix repens* are not described or designated in the Conservation Plan (MPSU, 2000) for Strandhill. At present, there are no conservation management strategies for this habitat. The most urgent action needed is the introduction of grazing at a sustainable level for this habitat. This part of the site is also under on-going threats from development.

The conservation status of this habitat was not assessed in the NATURA 2000 survey. The current overall EU conservation status of dunes with *Salix repens* at Strandhill is *unfavourable-inadequate* (Table 133C). It should be noted that further study of this habitat in Ireland is required in order to assess it fully.

The Irish conservation status is rated as *unfavourable-declining*.

Dune Slack (H2190)

The extent is rated as *unfavourable-inadequate* as there is an apparent decline in the number of dune slacks since the ASI survey. This may be due to the presence of the plantation, which may be impacting on the local hydrology. The remaining dune slack is heavily trampled and suffering erosion in places. An estimated loss of dune slack area of 1ha is given based on the ASI survey. It is unclear if dune slack habitat was present in the plantation area before its development.

One monitoring stop was placed in dune slack and failed due to the lack of typical species and excessive bare ground cover (Table 133D). However, given the low number of pioneer slacks encountered during this survey and the lack of information on monitoring of this type of slack, the targets for each attribute are not fully developed. Therefore, the structure and functions parameter is rated as *unfavourable-inadequate* in preference to *unfavourable–bad*.

The future prospects for this site are considered *unfavourable-inadequate* on the basis that there are no strategies outlined in the Conservation Plan (2000) for this habitat. Currently, the viability of this habitat is threatened by the presence of the golf course, which may be impacting on the local hydrology. Also, the plans to expand the golf course include the development of this habitat as part of the new golf course. If the golf course extends into this area it will result in the total loss of this habitat at Strandhill.

The conservation status of this habitat was described as *average or reduced* in the NATURA form. The current overall EU conservation status of dune slack at Strandhill is *unfavourable-inadequate* (Table 133C).

Under the Irish scheme, the conservation status for fixed dune at this site is *unfavourable – declining*.

Mobile Dunes (H2120)

The mobile habitat at Strandhill appears highly susceptible to natural erosion and it is almost absent from the northern section of the site where the fixed dunes are fronted by a steep eroding ridge. The NATURA 2000 form noted that there were good areas of mobile dunes running the length of the spit in the south of Strandhill. The total area of this habitat appears to have declined since the NATURA survey. Natural erosion is compounded by human disturbance in the southern part of the site, mainly due to trampling. Therefore, extent is considered *unfavourable-inadequate.*

Six monitoring stops were placed in the mobile dunes and one of these failed (Table 133D). The stop that failed contained a large amount of unhealthy *Ammophila arenaria* (Marram grass). Therefore, the structure and functions parameter is given a conservation status rating of *unfavourable-inadequate.* The area of mobile habitat at the tip of the spit is in good condition and is freshly accreting.

The mobile dunes are affected by natural and human induced erosion. The plans to control human induced erosion are discussed in the Conservation Plan (cSAC Ballysadare Bay) in relation to the protection of the fixed dunes and these plans could also include the other sand dune habitats. However, there is currently no active management in place. Until the issue of human induced erosion is actively managed at the site, the future prospects are considered *unfavourable-inadequate.*

The mobile dunes are rated as *good* in the overall conservation status assessment in the NATURA 2000 form. The mobile dunes are currently regarded as *unfavourable-inadequate* under the overall EU conservation status and *unfavourable-declining* under the Irish conservation status system (Table 133C). This unfavourable rating is due to some loss of extent caused by negative impacts from human pressures.

Embryonic Dunes (H2110)

The extent of the embryonic habitat is rated as *favourable* (Table 133C). This is based on best scientific judgement. The embryonic dunes occur along the seaward edge of the spit and at the tip and are absent along the eroding northern part of Strandhill.

There appears to be no current impact on the extent. This is one of the few developed embryonic habitats found along the west coast.

The structure and functions parameter is rated as *favourable*. Four monitoring stops were placed in the embryonic habitat and all of these passed. Where embryonic habitat occurs, it is dominated by healthy typical embryonic species *Elytrigia juncea* (Sand couch) with no negative indicator species present. Overall this habitat appears to be functioning well.

The future prospects of the embryonic habitat are considered *favourable*, as despite the potential threat from recreational pressures at this site these do not appear to impact this habitat. This may be related to the location of the embryonic dunes further south of the main informal access point at Shelly Valley.

The conservation status is rated as *good* in the NATURA 2000 notes. The present overall EU conservation status for embryonic dunes is considered *favourable*.

The overall Irish conservation status is *favourable-maintained* (133C).

Perennial vegetation of stony banks (H1220)

Shingle beaches were noted previously at Strandhill in the Conservation Plans for the site, most notably at Culleenamore Strand. There is no apparent decline in the extent of this habitat and therefore it is rated as *favourable*. Given the lack of detailed information on this habitat at Strandhill, the assessment is based on best scientific judgement.

Three monitoring stops were placed in this habitat and these passed. Based on an overall visual assessment of this habitat and presence/absence of typical species, the conservation status of the structure and functions is rated as *favourable*.

Future prospects are considered *unfavourable-inadequate*. This is attributed to recreational activities, mainly trampling from walkers and horseriding along the edge of the inner bay at Culleenamore. This impact is very difficult to quantify. However the succulent nature of many shingle plant species makes them very susceptible to

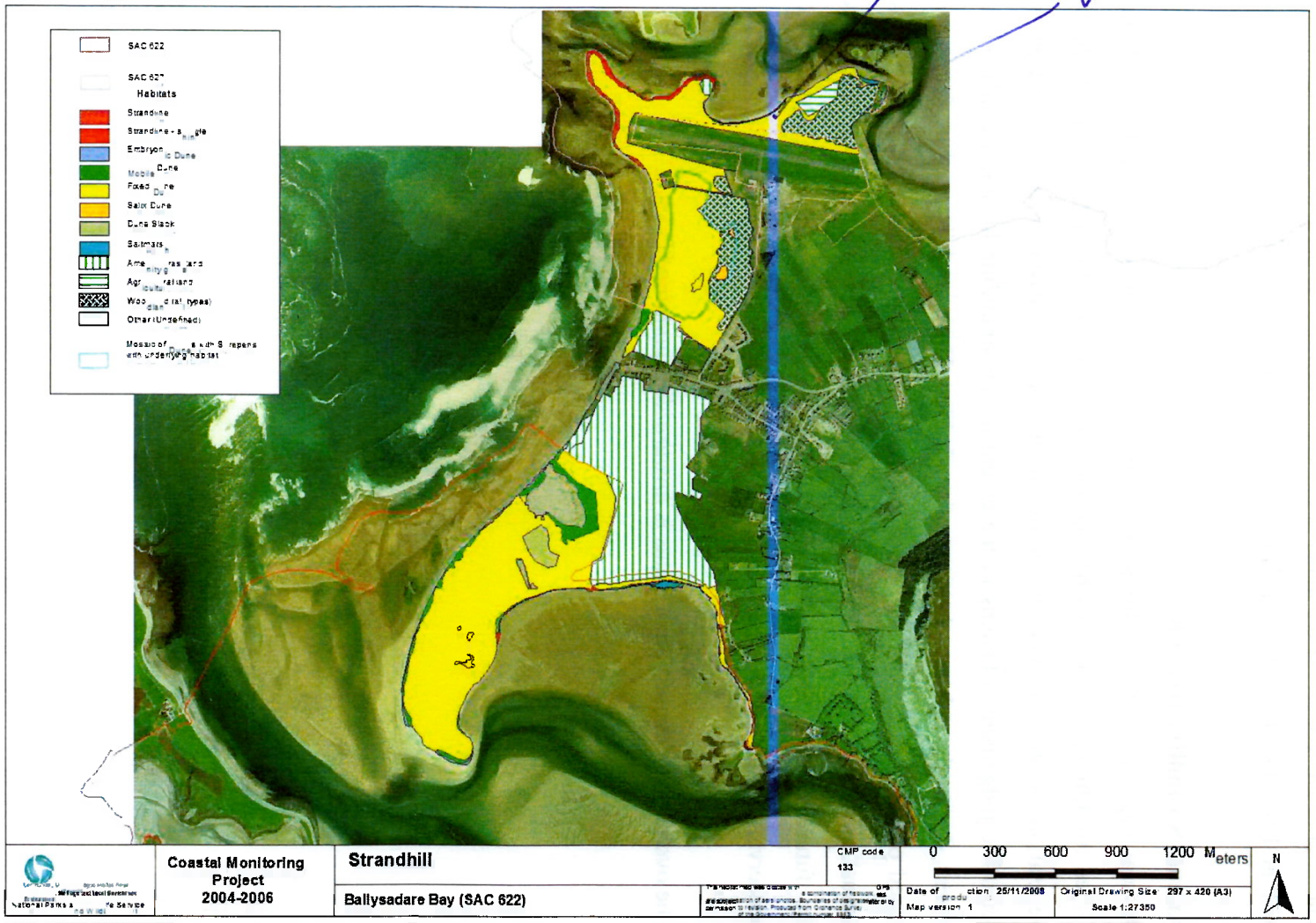
trampling. Trampling also compacts the cobble habitat restricting the germination of some seeds. If the plans to control human induced erosion are implemented perhaps the management of pedestrian traffic along the beach could also take into consideration the impacts on the shingle vegetation. Until this is addressed future prospects of this habitat are rated as *unfavourable-inadequate.*

The overall EU conservation status is currently regarded as *unfavourable-inadequate* and the Irish conservation status is *unfavourable-unchanged* (Table 133C).

Annual Strandline (H1210)

Annual vegetation of strandlines is confined to a narrow strip at Killaspug Point. Given the limited area of this habitat and the overlap of this habitat with Perennial vegetation of stony banks, the conservation status assessment is partly based on scientific judgement. Changes in the extent of the strandline habitat are difficult to assess, due to the ephemeral nature of the habitat. However it is rated as *favourable* based on the presence of tidal litter and strandline habitat that supports the typical annual species. The three monitoring stops passed and there is no apparent threat to the future of this habitat. Therefore, all three parameters and the overall EU conservation status of this habitat is rated as *favourable* (Table 133C).

The overall Irish conservation status is *favourable-maintained* (133C).


Fixed Dunes
woodland.
SAC 622
SAC 627
Habitats
Strandline
Embryonic Dune
Mobile Dune
Fixed Dune
Salix Dune
Dune Slack
Saltmarsh
Amenity grassland
Agricultural land
Woodland (all types)
Other (Undefined)
Mosaic of Semi-natural habitats with underlying habitat
Coastal Monitoring Project 2004-2006
Strandhill
Ballysadare Bay (SAC 622)
CMP code 133
0 300 600 900 1200 Meters
Date of production 25/11/2008
Map version 1
Original Drawing Size 297 x 420 (A3)
Scale 1:2750
N

Appendix III – Coney Island site report and habitat map from the Coastal Monitoring Project (Ryle *et al.*, 2009)

SITE DETAILS

CMP06 site name: **Coney Island** CMP06 site code: **134** CMP Map No.: **131**

County: **Sligo** Discovery map: **25** Grid Reference: **G 612 390**

6 inch Map No.: **Sl 7 & 8 & 13 & 14**

Aerial photographs (2000 series): **O 0951 A, B, C & D**

NPWS Site Name: **Cummeen Strand / Drumcliff Bay (Sligo Bay)**

NPWS designation: pNHA: **627** cSAC: **627** SPA: **4035**

Ranger Area**: Sligo**

MPSU Plan**: Draft II Consultation**

Report Author: **Anne Murray**

SITE DESCRIPTION

Coney Island sand dune system is part of a large coastal cSAC site that extends from Cullamore in the northwest to Killaspug in the southwest, Sligo town in the southeast and Drumcliff village in the northeast. The site is designated for the EU Annex I sand dune habitats – Fixed dunes, Mobile dunes and Embryonic dunes. Other habitats for which the site is designated are; Large shallow inlets and bays, Mudflats and sandflats not covered by seawater at low tide and Estuaries.

Six sand dune systems occur within the cSAC. For the purpose of this project the cSAC is divided into four main sites listed in the inventory of the sandy coasts of Ireland (Curtis, 1991). These are Strandhill (site 133), Coney Island (site 134), Rosses Point (site 135) and Yellow Strand (site 136). Two very small sand systems noted in the Consevation Plan (MPSU, 2000) are at Lisadell Strand and on Maguin's Island, these were not listed for this project.

Table 134A Areas of EU Annex I habitats mapped at Coney Island

EU Code	EU Habitat	Area (ha)
H1210	Annual vegetation of driftlines	0.021
H2110	Embryonic shifting dunes	0.672
H2120	Shifting dunes along the shoreline with *Ammophila arenaria*	0.455
H2130	Fixed coastal dunes with herbaceous vegetation	37.262*
H2190	Humid Dune Slacks	0.239
	Total sand dune	**38.649**

*21ha of fixed dune lies outside the cSAC

Coney Island is situated in Sligo Bay and lies at the mouth of Sligo Harbour alongside Oyster Island. The sand dunes of Coney Island cover the south and west of the island. They comprise tall fixed dune ridges along the southern edge which slope gently landward to lowlying dunes grading into wet agricultural fields. The eastern edge of the dunes is bordered by a narrow strip of saltmarsh. The more exposed western edge of the dunes are eroding, resulting in a steep sandy cliff which is fronted by a cobble beach (unvegetated).

EU Annex I sand dune habitats recorded during this survey at Coney Island are Fixed dunes (priority habitat), Dune slack, Mobile dunes, Embryonic dunes and Annual vegetation of driftlines. The total sand dune area is 38.649ha (Table 134A).

Fixed Dunes (H2130)

Fixed dunes are the main sand dune habitat (97% of the total area) at Coney Island covering 37.262ha (Table 134A). Approximately 21ha of the fixed dune area is fenced and lies outside of the cSAC north of the boundary, which is delineated on the ground by an old stone wall. The fixed dune is grazed by cattle, sheep and rabbits. The local rabbit population appears very high and rabbit burrows dominate the dune system. The dunes are overgrazed in the main with agricultural weeds abundant throughout.

The typical fixed dunes species recorded at Coney Island include *Carex arenaria* (Sand sedge), *Cerastium fontanum* (Common mouse-ear), *Euphrasia officinalis* agg (Eyebright), *Festuca rubra* (Red fescue), *Galium verum* (Lady's bedstraw), *Geranium molle* (Dove's-foot crane's-bill), *Hypochaeris radicata* (Cat's ear), *Linum catharticum* (Fairy flax), *Luzula campestris* (Field wood-rush), *Lotus corniculatus* (Common bird's-foot-trefoil), *Plantago lanceolata* (Ribwort plantain), *Poa pratensis* (Smooth meadow-grass), *Prunella vulgaris* (Selfheal), *Taraxacum* agg. (Dandelion), *Thymus polytrichus* (Wild thyme), *Trifolium repens* (White clover), *Veronica chamaedrys* (Germander speedwell) and the mosses - *Tortula ruraliformis*, *Rhytidiadelphus squarrosus* and *Rhytidiadelphus triquetrus*.

Other species present in the fixed dune include: *Agrostis stolonifera* (Creeping bent), *Ammophila arenaria* (Marram grass), *Bellis perennis* (Daisy), *Myosotis arvensis*

(Field forget-me-not), *Ranunculus bulbosus* (Bulbous buttercup) and *Rumex acetosella* (Sheep's sorrel).

The negative indicator species *Senecio jacobaea* (Common ragwort) and *Cirsium vulgare* (Spear thistle) are abundant throughout the fixed dunes.

Dune Slacks (H2190)

Three small areas of wet dune slack occur in the northern part of the fixed dunes comprising a total area of 0.239ha. These are heavily grazed and the negative indicator species *Cirsium vulgare* (Spear thistle) is common.

The typical dune slack species present are *Hydrocotyle vulgaris* (Marsh pennywort) *Galium palustre* (Marsh bedstraw), *Potentilla anserina* (Silverweed), *Prunella vulgaris* (Selfheal) and the moss - *Calliergonella cuspidata*.

Other species present include, *Agrostis stolonifera* (Creeping bent), *Anagallis tenella* (Bog pimpernel), *Carex flacca* (Glaucous sedge), *Cerastium fontanum* (Common mouse-ear), *Lotus corniculatus* (Common bird's-foot-trefoil), *Ranunculus repens* (Creeping buttercup) and *Trifolium repens* (White clover).

Mobile Dunes (H2120)

A narrow band of mobile dunes front the southwestern edge of the fixed dunes at Coney Island and comprise a total area of 0.455ha. These have formed from sand recycled from the eroding fixed dunes.

The mobile dunes are dominated by the typical species *Ammophila arenaria* (Marram grass) as well as some fixed dunes species including *Festuca rubra* (Red fescue), *Lotus corniculatus* (Common bird's-foot-trefoil) and *Taraxacum* agg. (Dandelion).

The negative indicator species *Senecio jacobaea* (Common ragwort) and *Cirsium vulgare* (Spear thistle) occur occasionally in the mobile habitat.

Embryonic Dunes (H2110)

Patches of embryonic dune occur along the south and western edge of the fixed dune habitat and the total area of 0.672ha. This is probably an overestimation as the habitat is significantly discontinuous along the frontline. The typical species *Elytrigia juncea* (Sand couch) dominates with no other species present.

Annual Strandline (H1210)

A very small area of annual strandline edges the southeast corner of the dunes and covers 0.021ha. The typical species present include *Atriplex* spp. (Orache spp.), *Cakile maritima* (Sea rocket) and *Honckenya peploides* (Sea sandwort). There are no negative indicator species present.

IMPACTS

The main activities impacting the sand dune system on Coney Island are listed in Table 134A. Grazing (code 140) is the main land-use activity on the dunes. Some parts of the fixed dune (mainly outside of the cSAC) are fenced into fields (code 150) and intensively managed. These fields contained a poor diversity of typical fixed dune species. Overgrazing by sheep, cattle and rabbits (code 142,143 and 146 respectively) has damaged the dunes and exacerbated natural erosion.

Table 134B Intensity and impact of various activities on sand dune habitats at Coney Island

EU Habitat Code[1]	Activity Code[2]	Intensity[3]	Impact[4]	Area affected/ha	Location of Activity[5]
H2130	103	C	-1	15	Inside
H2130	140	A	+2	21	Inside/Outside
H2130	142	A	-1	15	Inside/Outside
H2190	142	B	-1	0.2	Inside/Outside
H2130	143	A	-1	15	Inside/Outside
H2130	146	A	-1	15	Inside/Outside
H2130	150	A	-1	15	Inside
H2130	720	A	-1	15	Inside
H2130	900	B	0	Unknown	Inside
H2120	900	B	0	Unknown	Inside
H2130	954	A	-1	15	Inside

[1] EU Codes as per Interpretation Manual. Code 21BB is an additional code used to signify the entire dune habitat.
[2] Description of activity codes are found in Appendix 3
[3] Intensity of the influence of an activity is rated as: A= high, B = medium, C = low influence and D = unknown.
[4] Impact is rated as: -2 = irreparable negative influence, -1 = repairable negative influence, 0 = neutral, +1 = natural positive influence and +2 = strongly managed positive influence
[5] Location of activity: Inside = activities recorded within and directly impacting the cSAC. Outside = activities recorded outside but adjacent to sand dune habitat that are impacting the cSAC

The predominance of agricultural weeds (code 954) in the sand dunes has reduced the diversity of typical species. Rabbit burrows have undermined the structure of the dunes and induced erosion.

Natural erosion (code 900) is impacting the more exposed western edge of the sand dune system.

CONSERVATION STATUS

The conservation status of a site is assessed on the condition of the site and on baseline information. The main source of baseline information for this site is the ASI survey and the NATURA 2000 survey.

The method of assessment of conservation status differed in the NATURA 2000 survey and the various sand dune systems within the cSAC are assessed together, whereas each system is treated individually in this survey. Therefore, only broad comparisons between the conservation status of the two surveys was possible. The conservation status of the Annex I sand dune habitats on Coney Island are given in Table 134C.

Fixed Dunes (H2130)

The extent of fixed dunes at Coney Island is *unfavourable-inadequate*. Part of the fixed dune area lies outside of the cSAC and has not been mapped in previous surveys. The decline in area is due to erosion induced by overgrazing and rabbit burrowing which has resulted in large areas of bare sand across the fixed dunes.

Table 134C Conservation status of Annex I sand dune habitats at Coney Island

Habitat[1]	EU Conservation Status Assessment			Overall EU conservation status assessment	Proposed Irish conservation status system[2]
	Favourable	Unfavourable - Inadequate	Unfavourable - Bad		
Fixed Dunes (H2130)		Extent	Structure & Functions/ Future prospects	**Unfavourable-bad**	**Unfavourable-declining**
Dune Slack (H2190)	Extent/ Structure & Functions	Future prospects		**Unfavourable-inadequate**	**Unfavourable-declining**
Mobile Dunes (H2120)	Extent/ Structure & Functions	Future prospects		**Unfavourable-inadequate**	**Unfavourable-declining**

[1]EU Codes as per Interpretation Manual
[2] Ratings are Favourable (Enhanced, Maintained, Recovered, Declining), Unfavourable (Recovering, Unchanged, Declining) and Destroyed (Partially destroyed, Completely destroyed and Unknown)

Table 134D Pass/Fail results of mo nitoring stopsfor Annex I sand dune habitats at ConeyIsland

	Monitoring stops		
Habitat	**Pass**	**Fail**	**Conservation stat us**
Fixed Dunes (H2130)	4	2	Unfavourable-bad
Dune Slack (H2190)	1	0	Favourable
Mobile Dunes (H2120)	2	0	Favourable

Six monitoring stops were placed in the fixed dunes (Table 134D). Two of the monitoring stops were placed in the fixed dune outside of the cSAC and four within the cSAC. Two of the monitoring stops within the cSAC failed due to the high cover of bare ground and negative indicator species (agricultural weeds). The structure of the fixed dunes is undermined due to the high number of rabbit burrows in the habitat. Therefore, the structure and functions is rated *unfavourable-bad.*

The future prospects are *unfavourable-bad.* The habitat is largely destroyed by rabbit burrows and the impacts of overgrazing. The problem of overgrazing is recognised in the conservation plan and is described as 'slightly above ideal'. Monitoring is recommended in order to ensure a suitable grazing regime for the dunes. However the threats of overgrazing and rabbit burrowing are on-going. A reduction of the rabbit population is urgently required to alleviate the pressures on this habitat.

The conservation status of fixed dunes in the NATURA 2000 survey is rated as *average or reduced conservation.* None of the fixed dune areas of the cSAC including those at Coney Island are considered to be particularly good examples of this habitat. Currently, the overall EU conservation status of this habitat is *unfavourable-bad* (Table 134C) and this is attributable to the on-going threats of overgrazing and rabbit burrowing.

The Irish conservation status is rated as *unfavourable-declining.*

Dune Slacks (H2190)

The extent of dune slack on Coney Island is rated as *favourable* as there is no indication that the area has declined in recent times. This is based on best scientific judgement as this area of dune slack is not indicated on any of the previous maps available for this site and it is not mentioned in the MPSU conservation plan.

The structure and functions parameter is rated as *favourable*. One monitoring stop was placed in the dune slack area and this passed (Table 134D). Although the dune slacks are not overgrazed, poaching by sheep is evident and agricultural weeds have invaded some of the slack areas. This is taken into consideration in the future prospects of the habitat.

The future prospects for the dune slack are considered *unfavourable-inadequate.* Although it is not apparent in the monitoring stop, an overview of the entire habitat indicates that the current agricultural management is inappropriate for the dune slack. This threatens the viability of this habitat.

Currently, the overall EU conservation status of dune slack is *unfavourable-inadequate* (Table 134C), as the slack area is currently under pressure from agricultural activities..

The Irish conservation status is rated as *unfavourable-declining.*

Mobile Dunes (H2120)

The extent of mobile dunes at Coney Island is rated as *favourable* (Table 134C). Even though the mobile dunes are limited in extent, they appear intact. There are few visitors due to inaccessibility of the island and so the main impact on the mobile dunes is natural erosion which is not considered unfavourable.

Two monitoring stops were placed in the mobile dunes and these passed (Table 134D). Therefore, the structure and functions is rated as *favourable.*

The future prospects of the mobile dunes are considered *unfavourable-inadequate.* The activities currently impacting the rest of the dune system are likely to have repercussions for the future of the mobile dunes especially the intensity of rabbit burrowing.

The conservation status of fixed dunes in the NATURA 2000 survey is rated as *average or reduced conservation.* Currently, the overall EU conservation status of this habitat is *unfavourable-inadequate*(Table 134C).

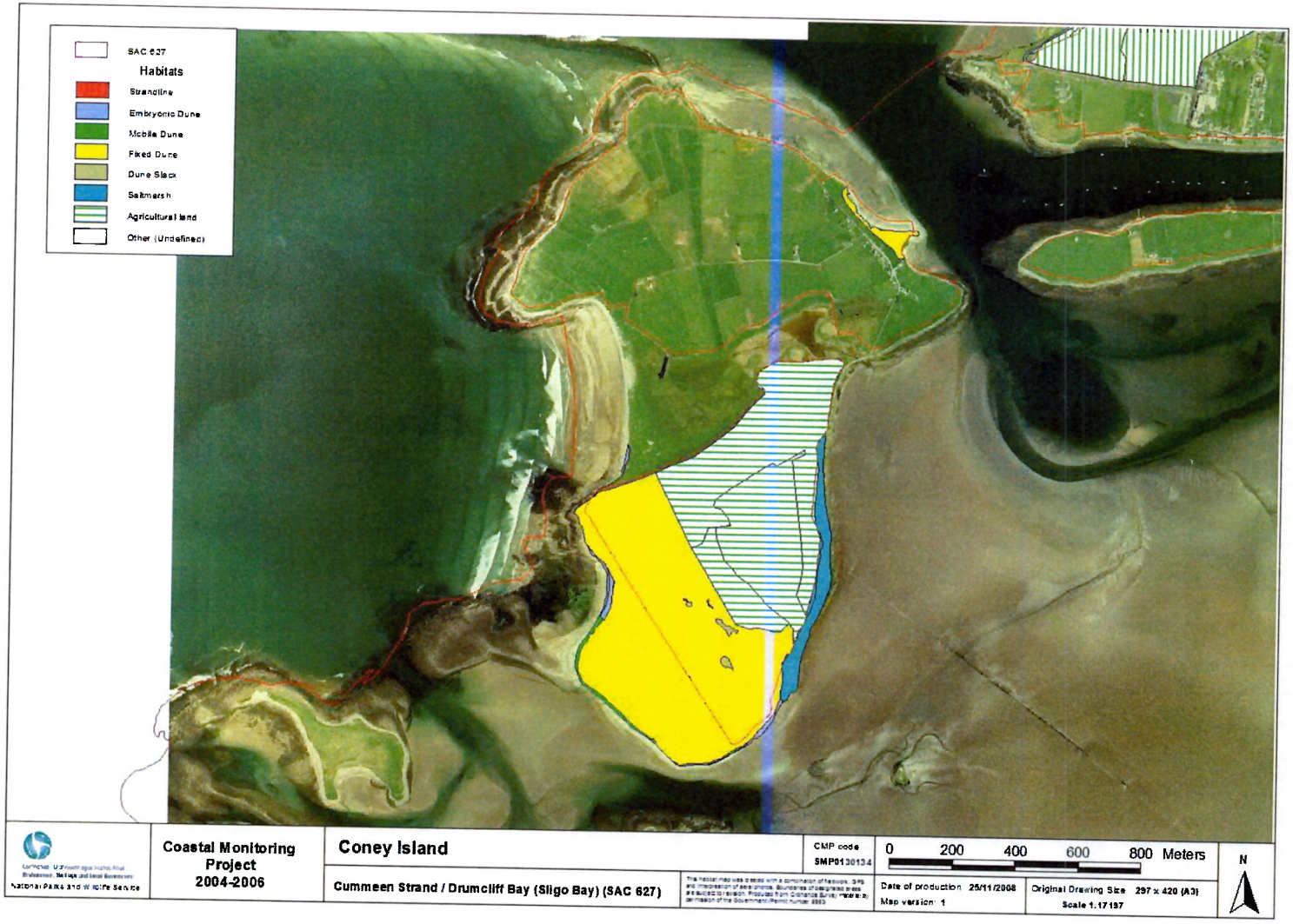
The Irish conservation status is rated as *unfavourable-declining*.

Embryonic Dunes (H2110)

The area of embryonic dunes is small and a conservation assessment is not required.

Annual Strandline (H1210)

The area of annual strandline is small and a conservation assessment is not required.


SAC 627
Habitats
Strandline
Embryonic Dune
Mobile Dune
Fixed Dune
Dune Slack
Saltmarsh
Agricultural land
Other (Undefined)
Coastal Monitoring Project 2004-2006
Coney Island
Cummeen Strand / Drumcliff Bay (Sligo Bay) (SAC 627)
CMP code SMP0130134
0 200 400 600 800 Meters
Date of production 25/11/2008
Map version: 1
Original Drawing Size 297 x 420 (A3)
Scale 1:17197
N

Appendix IV – Rosses Point site report and habitat map from the Coastal Monitoring Project (Ryle *et al.*, 2009)

SITE DETAILS
CMP06 site name: **Rosses Point** CMP06 site code: **135** CMP Map No.: **132**
County: **Sligo** Discovery map: **16** Grid Reference: **G 626 405**
6 inch Map No.: **Sl 8**
Aerial photographs (2000 series):**O 0847B;O 0848C;O 0895B,D;O 0896A,C; O 0951B**
NPWS Site Name: **Cummeen Strand / Drumcliff Bay (Sligo Bay)**
NPWS designation: pNHA: **627** cSAC: **627**
Blue Flag Beach: **Rosses Point**
Ranger Area: **Sligo**
MPSU Plan: **Draft II 2000**
Report Author: **Anne Murray**

SITE DESCRIPTION

Rosses Point sand dune system is part of a large coastal cSAC site that extends from Cullamore in the northwest to Killaspug in the southwest, Sligo town in the southeast and Drumcliff village in the northeast. The site is designated for the EU Annex I sand dune habitats – Fixed dunes and Embryonic dunes. Other habitats for which the site is designated are; Large shallow inlets and bays, Mudflats and sandflats not covered by seawater at low tide and Estuaries.

Six sand dune systems occur within the cSAC. For the purpose of this project the cSAC is divided into four main sites listed in the inventory of the sandy coasts of Ireland (Curtis, 1991). These are Strandhill (site 133), Coney Island (site 134), Rosses Point (site 135) and Yellow Strand (site 136). Two very small sand systems noted in the Consevation Plan (MPSU, 2000) are at Lisadell Strand and on Maguin's Island, these were not listed for this project.

Table 135A Areas of EU Annex I habitats mappedat Rosses Point

EU Code	EU Habitat	Area (ha)
H2130	Fixed coastal dunes with herbaceous vegetation	22.181
H2120	Mobile dunes	0.174
H2110	Embryonic shifting dunes	32.274*
	Total Sand dune	**54.629***

* This is an overestimation of the embryonic habitat and therefore of the total sand dune habitat (see text).

Rosses Point peninsula is located just north of Sligo Harbour. Most of the sand dune system has been modified by the presence of a golf course and is excluded from the site. The sand dune habitat within the cSAC comprises a narrow band of fixed dune that fringes the golf course and an area of embryonic dunes that extends the length of a sand spit on the northern edge of Rosses Point peninsula. This spit partially encloses Drumcliff Bay. Sandhills were noted on the early 1900s Ordnance Survey maps, along the north of the spit. These have since disappeared and have been replaced by hummocks of *Elytigia juncea* (Sand couch). An area of Meditteranean saltmarsh occurs in close association with the embryonic and fixed dunes along the southeastern edge of the spit.

The spit is noted as an important roosting area for waders including *Charadrius hiaticula* (Ringed Plover), *Calidris alba* (Sanderling) and *Calidris alpina* (Dunlin) and is partially included in Drumcliff Bay SPA 4013 and wildfowl sanctuary.

Marsh fritillary (*Eurodryas aurinia*), a butterfly species listed in Annex II of the E.U. Habitats Directive, has been recorded at Rosses Point.

EU Annex I sand dune habitats recorded during this survey at Rosses Point are Fixed dunes (priority habitat), Mobile dunes and Embryonic dunes. The total sand dune area is 55ha (Table 135A).

Fixed Dunes (H2130)

The priority habitat fixed dune comprises 22ha of the total sand dune habitat at Rosses Point (Table 135A). The golf course area is mapped as 93ha, however the boundary is not defined on the ground and a small area (approximately 1.5ha) to the south appears to lie within the cSAC boundary as indicated on the digital map **(CMP Map No. XX).** The area of fixed dune on the western edge of the golf course is undergoing natural erosion and this is compounded by recreational activities. Coastal protection in the form of rock armour, planting of *Phormium tenax* (New Zealand Flax), the installation of sand trapping fences and planting of *Elytrigia juncea* (Sand couch) have been carried out along this eroding edge. The success of these measures has been limited as the dunes are continuing to erode southwards towards Bomore Point. The area of fixed dune on the northern edge of the golf course is bound by an accreting sand spit and remains intact. However, there is no grazing and the fixed dunes are

rank, dominated by grasses *Arrhenatherum elatius* (False oat-grass) and *Festuca rubra* (Red fescue), with a thick carpet of moss underfoot.

The species diversity is low in the fixed dunes at Rosses Point. The typical species include: *Arrhenatherum elatius* (False oat-grass), *Anthyllis vulneraria* (Kidney vetch), *Daucus carota (*Wild carrot*), Festuca rubra* (Red fescue), *Galium verum* (Lady's bedstraw), *Hypochaeris radicata* (Cat's ear), *Lotus corniculatus* (Bird's foot trefoil), *Plantago lanceolata* (Ribwort plantain), *Taraxacum* agg. (Dandelion), *Trifolium repens* (White clover) and *Trifolium pratense* (Red clover) as well as the moss - *Rhytidiadelphus squarrosus.* Other species present are *Anacamptis pyramidalis* (Pyramidal orchid) and *Leucanthemum vulgare* (Oxeye daisy). Isolated *Acer pseudoplatanus* (Sycamore) trees are present on the northern part of the fixed dunes.

A limestone escarpment runs out to the coast (at Bomore Point) from fixed dunes at the southern part of the golf course (at the main access area to the dunes). This area is used as a viewing point for visitors with benches provided. As a result the area is heavily trampled and contains large amounts of bare sand and exposed rock. The lifeguard hut is also located here. This area is covered with a very thin layer of blowing sands that is colonised by species of dry grassland and heath including: *Aira praecox* (Early hair-grass), *Anthyllis vulneraria* (Kidney vetch), *Arrhenatherum elatius* (False oat-grass), *Bellis perennis* (Daisy), *Briza media* (Quaking-grass), *Carex arenaria* (Sand sedge), *Dactylis glomerata* (Cock's foot), *Danthonia decumbens* (Heath-grass), *Euphrasia officinalis* agg. (Eyebright), *Galium verum* (Lady's bedstraw), *Juniperus communis* (Common juniper), *Lotus corniculatus* (Bird's foot trefoil), *Salix cinerea* subsp. *cinerea* (Grey willow) and *Thymus polytrichus* (Wild thyme). This area is indicated on the digital map as a Juniper information point (See Main Report).

Mobile Dunes (H2120)

The total mobile dune comprises a very small area of 0.174 ha (Table 135A). The mobile dunes are confined to the beach between Bomore Point and Deadman's Point where it fronts the car park. The front slope of the mobile dunes is naturally eroding and heavily impacted by disturbance from recreational activities.

There are some small hummocks of *Ammophila arenaria* (Marram grass) on the spit at the northern section of the site at Rosses Point but these have not developed into a typical mobile zone.

The typical species *Ammophila arenaria* (Marram grass) dominates with other species present, including *Elytrigia juncea* (Sand couch) and *Eryngium maritimum* (Sea-Holly).

The negative indicator species *Cirsium arvense* (Creeping thistle) occurs in the mobile dunes but is not common.

Embryonic Dunes (H2110)

The mapped area of embryonic dunes at this site is 32ha. An area of 27ha of embryonic habitat is mapped on the spit at the northern part of the site. The tip of the spit is covered by freshly accreting sand and hummocks of the typical species - *Elytrigia juncea* (Sand couch). The western edge of the spit also comprises embryonic habitat. The neck of the spit is disturbed by natural forces of winter storms on the seaward edge, as a result *Ammophila arenaria* (Marram grass) dominated hummocks and fragmented patches of fixed dune species occur in mosaic with embryonic habitat. Saltmarsh occurs along the east and south of the spit and channels containing saltmarsh species traverse the lower part of the embryonic habitat. Overall the embryonic habitat is in good condition.

There is also a man-made ridge of sand, with the species - *Elytrigia juncea* (Sand Couch) forming an embryonic habitat on the western side of the golf course towards the headland of Rosses Point.

There are no negative indicator species in the embryonic dunes.

IMPACTS

The site has been impacted heavily by natural erosion and human activity. The impacts are listed in Table 135B. Rosses Point has well developed recreational infrastructure (code 530), with a large car park, public toilets and a lifeguard station behind the beach. There is also a scenic walking path with benches at Bomore Point

and Deadman's Point. Deadman's Point is stop no. 2 on "Yeat's Country Tour", a self guided driving tour published by Bord Failte.

There is easy access to the site and the recreational facilities of a Blue Flag beach along with the adjacent golf course (code 601) and caravan park (608), make it very popular. Impacts associated with recreational activities such as golfing (601), walking (code 622), picnicing, horse riding (code 622) and swimming are contributing to the overuse of the dune system in certain areas. This is evident at the access point near Bomore Point where trampling (code 720) and damage to vegetation is concentrated.

A car park and a shed (code 440), which holds equipment for the county council are also located on the fixed dunes at Bomore Point. These should be excluded from the cSAC, along with other sheds and buildings that have remained within the cSAC e.g. Sligo Yacht Club storehouse and clubhouse.

Table 135B Intensity and impact of various activities on sand dune habitats at Rosses Point

EU Habitat Code[1]	Activity Code[2]	Intensity[3]	Impact[4]	Area affected/ha	Location of Activity[5]
H2130	149	A	-1	20	Inside
H2130	421	C	-1	0.1	Inside
H2130	530	B	-1	4	Outside
H2130	601	A	-2	93	Outside
H2130	601	A	-1	1.5	Inside
H2130	608	B	-2	Unknown	Outside
H2130	622	C	-1	2	Inside
H2110	622	B	-1	Unknown	Inside
H2110	720	B	-1	Unknown	Inside
H2130	790	C	-1	0.4	Inside
H2130	871	B	-1	2	Inside
H2110	871	A	-1	2	Inside
H2130	600	C	-2	0.1	Inside
H2130	900	B	0	2	Inside
H2110	900	B	0	6	Inside

[1]EU Codes as per Interpretation Manual. Code 21BB is an additional code used to signify the entire dune habitat.
[2] Description of activity codes are found in Appendix 3
[3] Intensity of the influence of an activity is rated as: A= high, B = medium, C = low influence and D = unknown.
[4] Impact is rated as: -2 = irreparable negative influence, -1 = repairable negative influence, 0 = neutral, +1 = natural positive influence and +2 = strongly managed positive influence
[5] Location of activity: Inside = activities recorded within and directly impacting the cSAC. Outside = activities recorded outside but adjacent to sand dune habitat that are impacting the cSAC.

The fixed dune is also impacted by undergrazing (code 149) due to the absence of grazers at this site. This has resulted in a poor quality fixed dune habitat dominated by rank grasses and poor species diversity. The introduction of a grazing regime for this

site would require consideration of the recreational activities of the site and the limited area of fixed dune. It may be best suited to one or two horses or ponies.

Littering and burning from beach parties is evident in the fixed dunes, this has been classed under the category 'other pollution or human activities' (code 790).

Natural erosion (code 900) is impacting both the embryonic and fixed dunes along the western side of the golf course and this is compounded by trampling (code 720) by visitors and also by horse riding (code 622). Protection works have been installed including hard coastal protection measures (code 871)) along the northwestern edge of the golf course.

CONSERVATION STATUS

The conservation status of a site is assessed on the condition of the site and on baseline information. The main source of baseline information for this site is the ASI survey, Golf survey (Gaynor and Browne) and NATURA 2000 survey.

The method of assessment of conservation status differed in the NATURA 2000 survey and the current survey, so direct comparisons between the conservation status of the two surveys were not possible.

Fixed Dunes (H2130)

The extent of fixed dunes is rated as *unfavourable-inadequate* (Table 135C). This is based on scientific judgement as there is no previous information on the extent of this habitat at Rosses Point. There is an estimation of 5ha for the entire cSAC (NATURA 2000). A large part of the fixed dune area is now excluded from the site as it is occupied by a golf course, however an area of fixed dune contained within the cSAC at the southern part of this site appears to have been modified by the golf course. The fixed dune next to Bomore Point is affected by trampling from visitors and the physical presence of a car park. Therefore, loss of extent of the fixed dune is due to both natural erosion and recreational activities.

Table 135C Conservation status of Annex I sand dune habitats at Rosses Point

Habitat[1]	EU Conservation Status Assessment			Overall EU conservation status assessment	Proposed Irish conservation status system[2]
	Favourable	Unfavourable - Inadequate	Unfavourable - Bad		
Fixed Dunes (H2130)		Extent, Structure & functions, Future prospects		Unfavourable-inadequate	Unfavourable-declining
Mobile dunes (H2120)			Extent, Structure & functions, Future prospects	Unfavourable-bad	Partially destroyed
Embryonic Dunes (H2110)	Structure & functions	Extent, Future prospects		Unfavourable-inadequate	Unfavourable unchanged

[1] EU Codes as per Interpretation Manual
[2] Ratings are Favourable (Enhanced, Maintained, Recovered, Declining), Unfavourable (Recovering, Unchanged, Declining) and Destroyed (Partially destroyed, Completely destroyed and Unknown)

The structure and functions parameter is rated as *unfavourable-inadequate*. This is based on best scientific judgement. Although the four monitoring stops placed in the fixed dunes passed (Table 135D), overall the functioning of the fixed dune is poor due impacts associated with the presence of the golf course. Other recreational activities are restricted to the remaining fixed dune outside of the golf course, thus concentrating recreational impacts on the fixed dune within the cSAC and reducing the possibility of grazing at the site. One attribute that failed at three of the stops is the sward height indicating the lack of grazers at the site. There are some tracks through the fixed dunes but these are currently having a minor impact on the habitat and are probably contributing to the diversity of species albeit poor.

The future prospects for this habitat are considered *unfavourable-inadequate.* The main threat to the future of the habitat is the natural retreat of the coastline on the western edge of the golf course and the management of protection works by the golf course and county council in relation to natural erosion. Rosses Point has a well developed recreational infrastructure resulting in high amenity use of the beach and dunes that is likely to continue to impact negatively on the dunes.

The conservation status of the fixed dune was described as *average or reduced* in the NATURA 2000 survey. The current overall EU conservation status of fixed dunes at Rosses Point is *unfavourable-inadequate* (Table 135C). This reflects the impact of undergrazing and the high amenity use of this site resulting in loss of extent and reduction in the quality of this habitat.

The overall Irish conservation status is *unfavourable-declining.*

Table 135D Pass/Fail results of monitoring stops for Annex I sand dune habitats at Rosses Point

	Monitoring stops		
Habitat	**Pass**	**Fail**	**Conservation status**
Fixed Dunes (H2130)	4	0	**Unfavourable-inadequate***

*This conservation status is based upon best scientific judgement (see text)

Mobile Dunes (H2120)

Given the limited area of this habitat the conservation status assessment is based on best scientific judgement. The parameters and overall EU conservation status of this habitat is rated as *unfavourable-bad*, as the area is very disturbed by recreational activities. The area is heavily trampled, as it is located at the main access to the site just below the car park and caravan park. Some dumping of rubble is also evident along the top ridge of the mobile dune.

The overall Irish conservation status is *partially-destroyed.*

Embryonic Dunes (H2110)

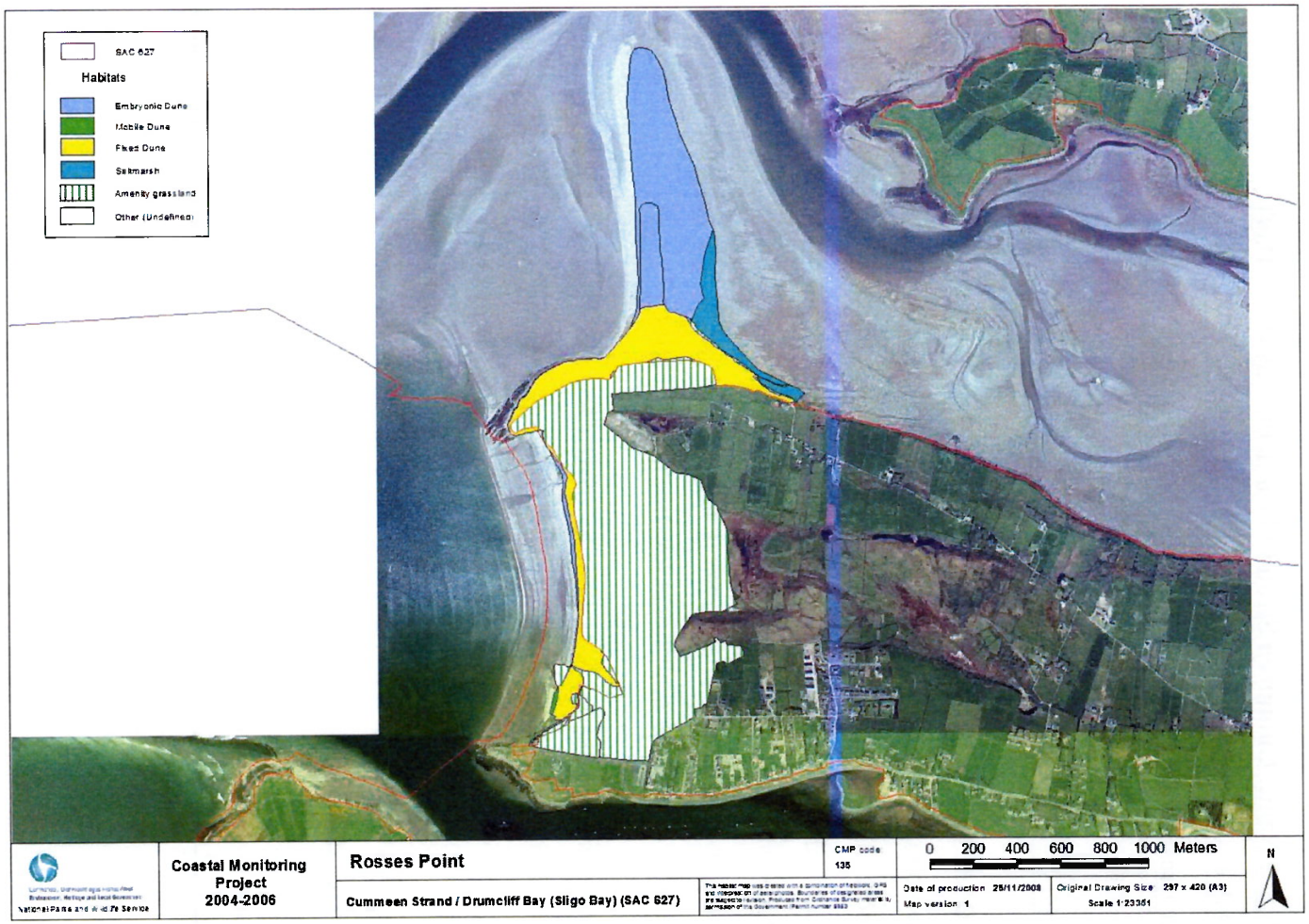
The extent of the embryonic habitat is rated as *unfavourable-inadequate.* This is based on best scientific judgement. An estimated area of less than 1ha is given in the NATURA 2000 survey. Natural erosion is occurring along the western edge of Rosses Point and this appears to be compounded by recreational activity mainly horse riding and the use of motorised vehicles in the northern part of the site (Table 135C).

The structure and functions parameter is rated as *favourable.* No monitoring stops were placed in the embryonic habitat, due to equipment failure on the day of survey. Where embryonic habitat occurs it is dominated by healthy typical embryonic species with no negative indicator species present.

The future prospects of the embryonic habitat are considered *unfavourable-inadequate*, as there is no active management prescribed in the conservation plan for this part of the cSAC. The impact of horse riding and motorised vehicles on this site (especially on the spit) should be examined and addressed. It is not possible to assess the extent or intensity of these impacts based on one site visit given the ephemeral nature. Therefore, the extent is given as 'unknown in Table 135B.

The conservation status is rated as *good* in the NATURA 2000 notes. The present overall EU conservation status for embryonic dunes is considered *unfavourable-inadequate*. This is attributable to the impacts of human activity at the site

The overall Irish conservation status is *unfavourable-unchanged.*


SAC 627
Habitats
Embryonic Dune
Mobile Dune
Fixed Dune
Saltmarsh
Amenity grassland
Other (Undefined)
Coastal Monitoring Project 2004-2006
Rosses Point
Cummeen Strand / Drumcliff Bay (Sligo Bay) (SAC 627)
CMP code 135
0 200 400 600 800 1000 Meters
Date of production 28/11/2008
Map version 1
Original Drawing Size 297 x 420 (A3)
Scale 1:23361
N

Appendix V – Yellow Strand report and habitat map from the Coastal Monitoring Project (Ryle *et al.*, 2009)

SITE DETAILS

CMP06 site name: **Yellow Strand** CMP06 site code: **136** CMP Map No.: **133**

County: **Sligo** Discovery map: **16** Grid Reference: **G 576 437**

6 inch Map No.: **Sl 7**

Aerial photographs (2000 series): **O 0846 A & C; O 0847 D; O 0848 C; O 0894 A; O 0895 B**

NPWS Site Name: **Cummeen Strand / Drumcliff Bay (Sligo Bay)**

NPWS designation: pNHA: **627** cSAC: **627**

Ranger Area**: Sligo**

MPSU Plan**: Draft II Consultation**

Report Author: **Anne Murray**

SITE DESCRIPTION

Yellow Strand sand dune system is part of a large coastal cSAC site that extends from Cullamore in the northwest to Killaspug in the southwest, Sligo town in the southeast and Drumcliff village in the northeast. The cSAC is designated for the EU Annex I sand dune habitats – Fixed dunes, Mobile dunes and Embryonic dunes. Other habitats for which the site is designated are; Large shallow inlets and bays, Mudflats and sandflats not covered by seawater at low tide and Estuaries.

Six sand dune systems occur within the cSAC. For the purpose of this project the cSAC is divided into four main sites listed in the inventory of the sandy coasts of Ireland (Curtis, 1991). These are Strandhill (site 133), Coney Island (site 134), Rosses Point (site 135) and Yellow Strand (site 136). Two very small sand systems noted in the Consevation Plan (MPSU, 2000) are at Lisadell Strand and on Maguin's Island, these were not listed for this project.

Table 136A Areas of EU Annex I habitats mapped at Yellow Strand

EU Code	EU Habitat	Area (ha)
H2110	Embryonic shifting dunes	0.837
H2120	Shifting dunes along the shoreline with *Ammophila arenaria*	0.491
H2130	Fixed coastal dunes with herbaceous vegetation	22.084
	Total sand dune	**23.412**

Yellow Strand dunes are located in townland of Ballintemple in the northwestern part of the cSAC. The sand dunes stretch from the old pier at Knocklane southeast to a small headland at Lackaneena. A road delineates the landward edge of the site. The higher (50-100m) peaty ground slopes from the road seaward to wet grassland and a sandy lowlying plain fronted by a narrow strip of dune ridges. The foredunes in the west have been breached by severe winter storms in the past and sand has blown inland some distance. The breach is now colonised by *Ammophila arenaria* (Marram grass). The sandy plain in the southeastern part of the site has been described as machair by Goodwillie (1972) and again by Eakin (1995). Similar to the rest of the site, the machair has been striped and altered by agricultural improvement. Interesting plant species noted by Eakin (1995) include *Spiranthes spiralis* (Autumn lady's tresses) and *Blackstonia perfoliata* (Yellow-wort), which occur at the very north of their range in Ireland.

The fields at Ballintemple are used by the Annex I bird species - Barnacle goose (*Branta leucopsis*) which occurs in internationally important numbers in the adjacent SPA of Drumcliff Bay. Ballintemple fields are locally known to have been the first fields in which the geese arrived each year and the last fields to be left.

Machair (H21A0)

Machair was noted at Yellow Strand in the ASI survey (Eakin 1995). It was described as dry calcareous grassland comprising of flat areas of rank vegetation interspersed with raised sandy hummocks of short grazed turf. The machair was agriculturally improved in places and supplementary feeding was also evident.

The short sward consisted of species including *Antennaria dioica* (Mountain everlasting), *Euphrasia officinalis* agg (Eyebright), *Linum catharticum* (Fairy flax), *Pilosella officinarum* (Mouse-ear-hawkweed) and *Thymus polytrichus* (Wild thyme). In the wetter machair areas other species included *Hydrocotyle vulgaris* (Marsh pennywort), *Mentha aquatica* (Water mint) and *Ranunculus flammula* (Lesser spearwort). Plant species of note also present in the machair were *Spiranthes spiralis* (Autumn lady's tresses) and *Blackstonia perfoliata* (Yellow-wort) as discussed above.

On the day of the site visit (during this survey) access was denied to the fields beyond the fenceline of the fixed dunes. Heavy rains hampered a visual assessment (from the fenceline) of the area denoted as machair on the ASI map. The machair fields appeared improved for the most part with grazing and supplementary feeding evident. The total area of machair is approximately 30-50ha (based on the ASI map). The habitat would require closer examination in order to establish the current condition of the habitat and to assign a conservation status to the habitat. It is mentioned in the conservation plan under the heading 'sand dunes (other than fixed dune)'. However, the cSAC is not designated for this habitat and therefore there is no conservation assessment of this habitat in the NATURA 2000 form.

Fixed Dunes (H2130)

A narrow strip of fixed dunes fronted by a steep cliff face edges Yellow Strand and comprises an area of 22.084ha. The foot of the eroding face is colonised by both *Ammophila arenaria* (Marram grass) and *Elytrigia juncea* (Sand couch). The frontline consists of an upper cobble beach and a lower sandy beach. The fixed dunes have been breached in the past due to winter storms and the breach is now revegetating. The fixed dunes are fenced and are grazed by cattle. Agricultural weeds dominate the vegetation which is relatively species poor.

The typical fixed dunes species recorded at Yellow Strand include *Agrostis capillaris* (Common bent), *Carex arenaria* (Sand sedge), *Cerastium fontanum* (Common mouse-ear), *Festuca rubra* (Red fescue), *Galium verum* (Lady's bedstraw), *Hypochaeris radicata* (Cat's ear), *Linum catharticum* (Fairy flax), *Luzula campestris* (Field wood-rush), *Lotus corniculatus* (Common bird's-foot-trefoil), *Plantago lanceolata* (Ribwort plantain), *Taraxacum* agg. (Dandelion), *Trifolium repens* (White clover), *Veronica chamaedrys* (Germander speedwell) and the moss -*Rhytidiadelphus triquetrus*.

Other species present in the fixed dune include: *Ammophila arenaria* (Marram grass), *Bellis perennis* (Daisy), *Carex nigra* (Common sedge), *Dactylis glomerata* (Cocksfoot), *Holcus lanatus* (Yorkshire fog) and *Ranunculus repens* (Creeping buttercup).

The negative indicator species *Cirsium arvense* (Creeping thistle), *Lolium perenne* (Perennial rye-grass) and *Senecio jacobaea* (Common ragwort) are abundant throughout the fixed dunes..

Mobile Dunes (H2120)

A small area of 0.491ha of mobile dunes has formed in the breach in the western part of the dunes and extends into the fixed dune area. The area is dominated by the typical species *Ammophila arenaria* (Marram grass) and is fronted by embryonic dunes.

Embryonic Dunes (H1220)

The embryonic dunes form a thin band edging the front eroding face of fixed dunes, widening to fill the breach at the western end of the strand. The total area of this habitat is 0.837ha and it is formed from recycled sand of the eroding fixed dunes.

The typical species Elytrigia juncea (Sand couch) dominates with *Ammophila arenaria* (Marram grass), *Festuca rubra* (Red fescue) and *Honckenya peploides* (Sea sandwort) also present.

The negative indicator species *Cirsium arvense* (Creeping thistle) occurs in the embryonic habitat but is rare.

IMPACTS

The main activities impacting the sand habitats at Yellow Strand are given in Table 136B. The dominant farming activity is grazing and most of the site is fenced into fields that run perpendicular to the coastline (code 150). The intensive agricultural management of the fields has led to overgrazing in places, mainly by cattle (code 143). Rabbit grazing (code 146) and burrowing is also evident. Agricultural improvement (code 103) and stock feeding (code 171) has resulted in a high cover of agricultural grasses and weeds. There is also an animal house and shelter (code 430) located on the fixed dunes. Natural erosion (code 900) is exacerbated by poaching and trampling of the dunes by livestock as well as rabbit burrowing.

Table 136B Intensity and impact of various activities on sand dune habitats at Yellow Strand

EU Habitat Code[1]	Activity Code[2]	Intens ity[3]	Impac t[4]	Area affected/ha	Location of Acti vity[5]
H2130	103	A	-1	15	Inside
H2130	143	A	-1	15	Inside
H2130	146	A	-1	15	Inside
H2130	150	A	-1	20	Inside
H2130	171	C	-1	1	Inside
H2130	430	B	-2	0.5	Inside
H2130	900	A	0	Unknown	Inside
H2120	900	A	0	Unknown	Inside
H2110	900	A	0	U nknown	Inside

[1] EU Codes as per Interpretation Manual. Code 21BB is an additional code used to s ignify the entire dune habitat.
[2] Description of activity codes are found in Appendix 3
[3] Intensity of the influence of an activity is rated as: A= high, B = medium, C = low influence and D = unknown.
[4] Impact is rated as: -2 = irreparable negative influence, -1 = repairable negative influence, 0 = neutral, +1 = natural positive influence and +2 = strongly managed positive influence
[5] Location of activity: Inside = activities recorded within and directly impacting the cSAC. Outside = activities recorded outside but adjacent to sand dune habitat that are impacting the cSAC.

CONSERVATION STATUS

The conservation status of a site is assessed on the condition of the site and on baseline information. The main source of baseline information for this site is the ASI survey, the NATURA 2000 survey and the most recent MPSU plan.

The method of assessment of conservation status differed in the NATURA 2000 survey as the various sand dune systems within the cSAC are assessed together, whereas each system is treated individually in this survey. Therefore, only broad comparisons between the conservation status of the two surveys were possible. The conservation status of the Annex I sand dune habitats on Yellow Strand are given in Table 136C.

Table 136C Conservation status of Annex I sand dune habitats at Yellow Strand

Habitat[1]	E U Conservation Status Assessment			Overall EU conservation status assessment	Proposed Irish conservation status system[2]
	Favourable	Unfavourable-Inadequate	Unfavourable - Bad		
Fixed Dunes (H21 30)		Extent	Structure & Functions/ Future prospects	Unfavourable-bad	**Partially destroyed**
Embryonic Dunes (H2110)	Extent/ Structure & Functions/ Future prospects			Favourable	**Favourable-maintained**

[1] EU Codes as per Interpretation Manual
[2] Ratings are Favourable (Enhanced, Maintained, Recovered, Declining), Unfavourable (Recovering, Unchanged, Declining) and Destroyed (Partially destroyed, Completely destroyed and Unknown)
*This assessment is based on best scientific judgement (see text)

Table 136D Pass/Fail results of monitoring stops for Annex I sand dune habitats at Yellow Strand

	Monitoring stops		
Habitat	**Pass**	**Fail**	**Conservation status**
Fixed Dunes (H2130)	1	3	Unfavourable-bad
Embryonic Dunes (H2110)	4	0	Favourable-

Fixed Dunes (H2130)

The extent of fixed dunes at Yellow Strand is *unfavourable-inadequate* (Table 136C). The decline in area is due to erosion induced by overgrazing, trampling and rabbit burrowing which has resulted in numerous areas of bare sand across the fixed dunes. The presence of animal housing has also reduced the extent of the dunes.

Four monitoring stops were placed in the fixed dunes and three of these failed. The monitoring stops failed to reach the targets for a number of different attributes including typical species, the cover of bare ground, sward height and negative indicator species (agricultural weeds). Therefore, the structure and functions is rated *unfavourable-bad* (136D).

The future prospects are *unfavourable-bad*. The habitat has been modified by agricultural improvement and the impacts of overgrazing. The management of the Yellow Strand dunes by grazing is one of the objectives stated in the conservation plan. However, it would appear that a suitable grazing regime and stocking density has yet to be established. Agricultural improvement of the dunes is another on-going threat at this site.

The conservation status of fixed dunes in the NATURA 2000 survey is rated as *average or reduced conservation*. None of the fixed dune areas of the cSAC including those at Yellow Strand are considered to be particularly good examples of this habitat. Currently, the overall EU conservation status of this habitat is *unfavourable-bad* (Table 136C) and this is attributable to the on-going threats of overgrazing and agricultural improvement.

The Irish conservation status is rated as *partially destroyed*.

Mobile Dunes (H2120)

Given the small area of mobile dune sat Yellow Strand, a conservation assessment is not required.

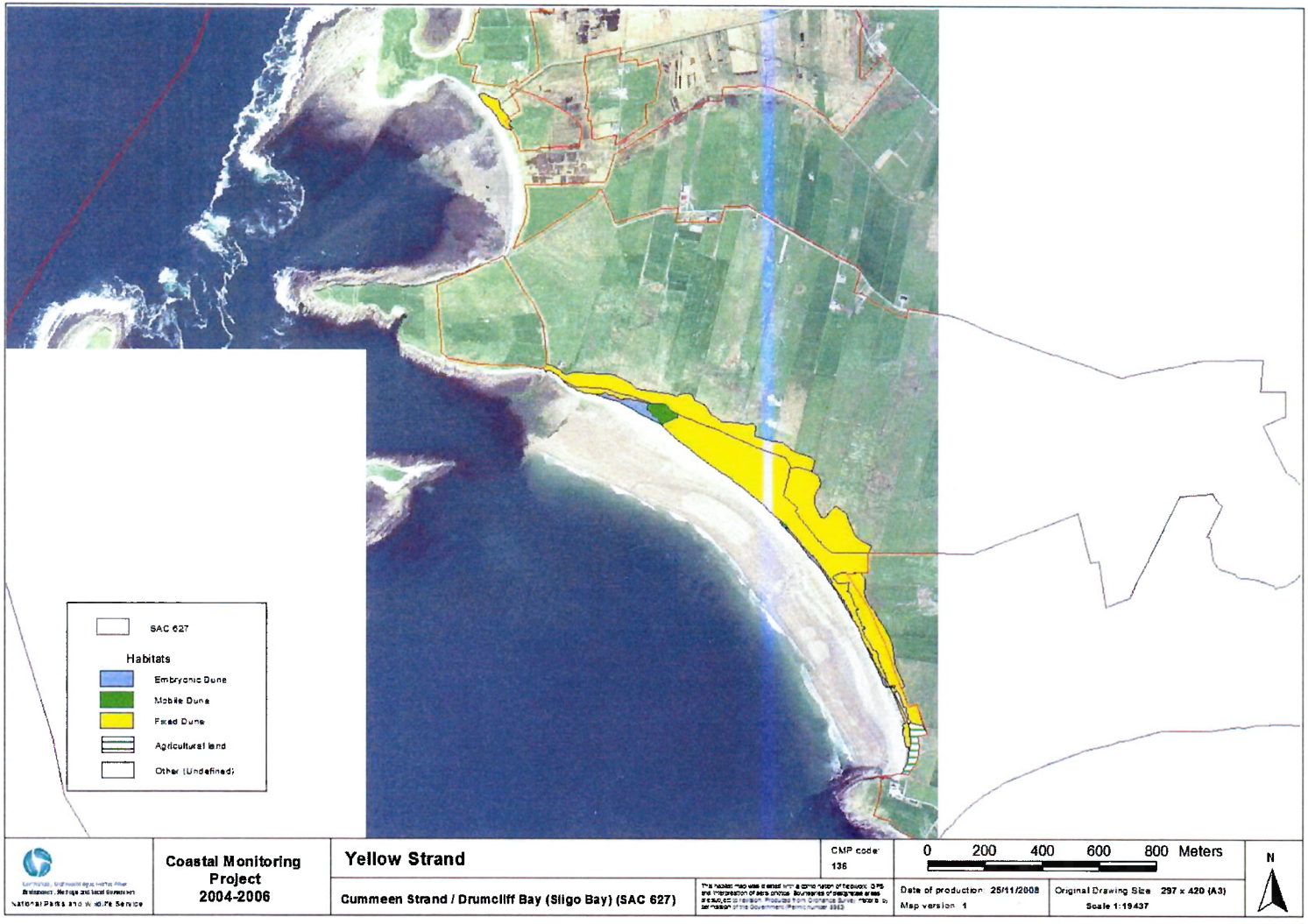
Embryonic Dunes (H2110)

The extent of the embryonic dunes is rated as *favourable*. There is a narrow band of embryonic fronting the eroding fixed dunes. Given the more exposed nature of the west coast to Atlantic Ocean, the embryonic habitat on the west/northwest coast of Ireland differs from the wider more accreting embryonic zones of the east coast. The embryonic dunes tend to occur as a narrow band on the slopes of actively eroding sand dune or machair habitat. These are undergoing natural erosion at Yellow Strand, a process that is not considered unfavourable in relation to extent of habitat. Most of the sand available for foredune development is coming from the eroding fixed dunes.

Structure and functions is rated as *favourable*. Four monitoring stops were placed in the embryonic dunes and all of these passed.

The future prospects of the embryonic dunes are considered *favourable*. There appear to be few threats to this habitat as it is fenced off from the agricultural activities of the rest of the site. Recreational use of the beach and dunes is low given the remoteness of the beach and the strong currents of the sea here.

Embryonic dunes are not mentioned in the NATURA 2000 form. The current overall EU conservation assessment is rated as *favourable* and the Irish conservation status is rated as *favourable- maintained*.


SAC 627
Habitats
Embryonic Dune
Mobile Dune
Fixed Dune
Agricultural land
Other (Undefined)
Coastal Monitoring Project 2004-2006
Yellow Strand
Gunmeen Strand / Drumcliff Bay (Sligo Bay) (SAC 627)
CMP code: 136
0 200 400 600 800 Meters
N
Date of production: 25/11/2008
Map version: 1
Original Drawing Size: 297 x 420 (A3)
Scale 1:19437