



An
Bord
Pleanála

Inspector's Report ABP-300988-18

Development	Construction of 21 unit housing development consisting of 7 No. two storey detached houses, 14 No. two storey semi-detached houses.
Location	Barrymore Townland, Kiltoom, Athlone, Co. Roscommon.
Planning Authority	Roscommon County Council
Planning Authority Reg. Ref.	17/480
Applicant(s)	Aidan Kelly
Type of Application	Permission
Planning Authority Decision	Refuse Permission
Type of Appeal	First Party
Appellant(s)	Aidan Kelly
Observer(s)	None
Date of Site Inspection	4 th May 2018
Inspector	Una O'Neill

Contents

1.0 Site Location and Description	3
2.0 Proposed Development	3
3.0 Planning Authority Decision	4
3.1. Decision	4
3.2. Planning Authority Reports	5
3.3. Prescribed Bodies	5
3.4. Third Party Observations	6
4.0 Planning History.....	6
5.0 Policy Context.....	6
6.0 Natural Heritage Designations	9
7.0 The Appeal	9
7.1. Grounds of Appeal	9
7.2. Planning Authority Response	11
7.3. Observations	11
7.4. Further Responses.....	11
8.0 Assessment	11
9.0 Recommendation.....	20
10.0 Reasons and Considerations	21

1.0 Site Location and Description

- 1.1. The subject site is located approx. 7km northwest of Athlone, in the area of Barrymore, in south County Roscommon, near the western shore of Lough Ree. The area is characterised by a predominance of single dwellings along local roads, with no obvious nucleus. Lough Ree is located approx. 500m to the east and the Hodson Bay Hotel, located on the shore of Lough Ree, is situated circa 3km to the north-east of the site. The Dublin to Castlebar rail line is west of the site, with a signalised level crossing on the L-2021, 180m to the west of the site.
- 1.2. The site, which has a stated area of 2.41ha, is accessed off a local road/ L-2021, via an access off the N61. The site has a road frontage of approx. 120m onto the L-2021. The site comprises of open fields with undulating topography, with mature trees/hedgerows along the southern, western and eastern boundaries. The northern boundary is largely undefined within the existing field. The entrance to the site comprises an agricultural gate and a gravelled access route part of the way into the site. There appears to be the foundations of a previous building on the site and evidence of spoil on the land. An open agricultural shed is positioned to the southwest of the site, in proximity to the boundary with neighbouring single storey dwellings to the southwest, which are accessed off the L-2021. The remainder of the western boundary comprises the rear gardens of a row of detached bungalows within a cul-de-sac off the L-2021, that cul-de-sac comprising approx. 17 dwellings. The southeast of the site is bound by an existing bungalow with block wall and the remainder of the eastern boundary is to agricultural fields.

2.0 Proposed Development

- 2.1. The proposed development comprises the following:
- Construction of 21 two storey dwelling units.
 - 7 of the units are 5 bed and detached.
 - 14 of the units are semi-detached, 12 of which are 4 bed and 2 of which are 3 bed.

- Public open space.
- Demolition of an agricultural shed.
- Connection to public services.

3.0 Planning Authority Decision

3.1. Decision

Permission REFUSED for the following reasons:

R1: The proposed development by reason of its height and general design theme which fails to take due cognisance of existing ground levels would not integrate with and would be significantly out of context with adjoining development and established character of this area and would, if permitted be contrary to policy 4.6 of the Hodson Bay/Barrymore Area Plan which seeks 'ensure that housing proposals accord with statutory guidance document, 'Sustainable Residential Development in Urban Areas' and that 'housing layouts confirm to prevailing and appropriate densities established in the vicinity'. The proposed development would therefore be contrary to the proper planning and sustainable development of the area.

R2: Having regard to the form, layout and design of established residential development in the area, it is considered that the proposed development would be visually incongruous and out of character with the existing pattern of development. It would represent substandard, non-integrated and haphazard layout which would be an inappropriate form of development, would set an undesirable precedent for other similar inappropriate development and which would be contrary to the proper planning and sustainable development of the area.

R3: Having regard to the location of the application site in proximity to the Lough Ree Special Area of Conservation (site code:000440) and the Lough Ree Special Protection Area (site code: 004064) which comprise part of the Natura 2000 network of sites and on the basis of inadequate information submitted with the application and in particular the absence of a Natura

Impact Statement, the Planning Authority is not satisfied that the proposed development individually, or in combination with other plans or projects would not be likely to have a significant effect on the Natura 2000 network. The proposed plans would, therefore, be contrary to the 'Appropriate Assessment of Plans and Projects in Ireland, Guidance for Planning Authorities, 2009' and the proper planning and sustainable development of the area.

3.2. Planning Authority Reports

3.2.1. Planning Reports

The Planning Officer's report generally reflects the decision of the Planning Authority. The following is of note:

- Density of 9 dwellings per hectare considered to be consistent with the site context, which is a semi-rural setting.
- Semi-detached units/dwelling type incongruous/inconsistent with the established pattern of development in the area, where dwellings are provided on larger sites.
- There is a disparity in design terms between the detached units and semi-detached units to the rear.
- No regard has been had to the level differentials across the site.
- Lack of information submitted in relation to appropriate assessment given proximity of Lough Ree. There is a potential for indirect impacts through construction noise, silt run-off, infiltration of groundwaters etc.

3.2.2. Other Technical Reports

Housing Section: No objection.

Environment Section: No objection in principle. Because of the contours on the site a cut and fill operation will be required. A C&D plan is required. The plan shall include an examination of the site for alien species, in particular Japanese Knotweed.

Lighting scheme required.

3.3. Prescribed Bodies

None.

3.4. **Third Party Observations**

One third party observation was received and concerns raised included inappropriateness of the density which is considered too high; inappropriateness of dwelling types and scale; traffic impact; no NIS submitted; area utilised by migrating birds, there are badgers setts under the ground in this area and other wildlife species are present; there are no services in the area; and excessive traffic will result with this development.

4.0 **Planning History**

PL20.240181 – The southern part of this site is the same of that subject of this appeal and also included the lands north of the current appeal site (zoned 'Residential Reserve' in the current Hodson Bay/Barrymore Area Plan).

Permission was REFUSED for 50 dwellings for the following reasons:

R1: The Board considered that the proposed layout, involving five individual access points onto a local road in addition to the main access for the development would be likely to endanger public safety and convenience by reason of traffic hazard and would not be in the interests of the proper planning and sustainable development of the area.

R2: The Board considered that the layout of the proposal did not adequately cater for the provision of the proposed link road indicated on the Hodson Bay/Barrymore Area Plan 2008-2014 and shown passing through the site, and considered that the proposed layout, with houses directly accessing onto the main internal road shown on the design, would prejudice any future proposed link road for the area. The Board therefore concluded, in the absence of a layout plan indicating how the proposed link road could be incorporated to give access to other lands in the vicinity, that the proposed development would not be in the interests of orderly development.

5.0 **Policy Context**

5.1. **National Policy**

- Guidelines for Planning Authorities on Sustainable Residential Development in Urban Area (2009). Urban Design Manual, A Best Practice (DOEHLG, 2009).
- Urban Design Manual-A Best Practice Guide and the Design Manual for Urban Roads and Streets (2013) DMURS.

5.2. Roscommon County Development Plan 2014-2020

Chapter 5: Hodson Bay is identified as a tier 3 settlement

Chapter 9: Development Management Guidelines and Standards.

Section 9.5: Guidance in respect of residential design in the countryside...

- Development proposals in the countryside must be integrated into their rural setting and must satisfy high standards of location, siting and design considering design issues such as scale, massing, orientation, choice of materials and landscaping.
- The design of a proposal should reflect its setting, including the topography, the scale, height, and character of existing buildings in the vicinity...
- In terms of landscaping, trees and shrubs appropriate to the Irish landscape should be used. A detailed species specific landscaping scheme shall be submitted with each planning application. This shall place strong emphasis on native species of trees and shrubs. If deemed necessary, the Planning Authority shall impose a financial bond to ensure that specific planting schemes are satisfactorily implemented.

Section 9.5.2: Roadside Boundaries

Section 9.6.1: Zoned lands in tiered settlements centres (Tiers 1-3).

Key issues include:

- Appropriate Brownfield and Greenfield densities and maximum utilisation of zoned and serviced lands on transport corridors.
- Design of attractive places to live for a range of habitational requirements...

- Increasing utility of sustainable transport types such as walking, cycling and public transport.

Section 9.6.7: Open space areas should be overlooked by the maximum possible number of units within the layout.

5.3. Hodson Bay/Barrymore Area Plan 2014-2020

- The Hodson Bay / Barrymore Area Plan is defined in the Settlement Hierarchy as a Tier 3 settlement within the Core Strategy for the RCDP 2014-2020.
- The Area Plan designates 2.3ha as 'New Residential' to be developed at an indicated density of 15 units/ha, given its edge of town location and the figures are as per the core strategy.
- An area of 2.42 ha has been identified as 'Residential Reserve', which can be development when all lands zoned 'New Residential' have been developed.
- Indicative Link Road is proposed through the new residential area connecting into other areas of the Area Plan.
- **Policy 4.6:** Ensure that housing proposals accord with the Statutory Guidance document, Sustainable Residential Development in Urban Areas, (DEHLG, May 2007) and the Urban Design Manual: A best practice guide (December 2008) as well as the Development Management Guidelines and Standards, which form part of the RCDP 2014-2020, except in the case of lands zoned for Transitional Agriculture. Housing layouts shall conform to prevailing and appropriate densities established in the vicinity.
- **Objective 5.3:** It shall be an objective of this Area Plan, and subject to prevailing economic conditions and impetus to provide a neighbourhood centre along the Link road within the Hodson Bay / Barrymore Area.
- **Policy 5.3:** Ensure the provision of a comprehensive traffic system which is compatible with the pattern of land use in the area and with through traffic.
- **Objective 5.1:** Provide adequate pedestrian paths and cycle tracks along all main routes in the area to ensure safety and convenient access.

- **Objective 5.7:** Ensure that development lands are not “cut-off” by reserving access points from public/private roads to these lands within the Area Plan area and thus allow their development potential to be realised.
- **Objective 9.3:** Ensure that fully equipped playgrounds to appropriate standards are provided within all new housing developments in excess of 20 units. In addition, a hierarchy of useable open spaces and the provision of recreational facilities appropriate to the size of the estate, or taken in combination with a number of estates, are provided e.g. seating areas, landscaped open spaces, basketball courts, skatepark areas, public parks and playing pitches.
- **Objective 9.4:** Ensure that adequate internal open spaces and landscaping are provided within developments, including the following:
 1. Retain existing mature and semi-mature trees and hedgerows on undeveloped land, where practicable and incorporate into the layout and design of developments. If retention is not possible replacement proposals will be required.
 2. Provide landscaped open spaces and parking areas within developments to provide visual relief from the built development, spaces for relaxation for staff, adequate lighting into buildings and space for parking.

6.0 Natural Heritage Designations

Lough Ree SAC (site code 000440) and Lough Ree SPA (site code 004064) is located approx. 450km to the east of the subject site at its closest point.

7.0 The Appeal

7.1. Grounds of Appeal

The applicant has appealed the decision of Roscommon County Council to refuse permission. The grounds of appeal are summarised as follows:

- The proposed development is in line with national and local policy. NPF identifies Athlone as a key regional centre. Barrymore is the nearest settlement to Athlone which has undeveloped serviced land.
- Proposed development is in accordance with Area Plan
- The dwellings will be linked by gravity sewers to the existing public network. There are no drop manholes in the design.
- 9 units per hectare density compares to an existing density in this area of 4-5 units. The overall masterplan for the site combined with the potential second phase to the north would provide a density in the region of 13 units per hectare.
- An area of the site comprises frozen lands that cannot be developed by way of an agreement on the original sale of the lands, as per drawing no 17.131A-101, appendix B. This together with the link road reduces the overall density.
- Design provides for housing mix and is considered a sustainable design solution.
- The houses were designed by an architect and comply with all standards. The maximum road gradient is 1:75 which is a gentle slope and within this the design follows the natural contours of the site.
- It would be unsustainable to follow the existing pattern of development in the area, which is at a very low density.
- The separation distances are in all instances well in excess of the minimum required. The play area identified has a secondary role as a buffer with existing dwellings.
- There is a long history of AA on these lands. Three AAs have been carried out by the local authority within the current development plan, area plan and for infrastructure projects including the Barrymore sewage treatment plan and for a housing proposal (PL20.240181). ABP in assessing a previous housing scheme found the development would not have an adverse effect on the integrity of any natura sites. The main impacts were deemed to be construction impacts.

7.2. **Planning Authority Response**

None.

7.3. **Observations**

None.

7.4. **Further Responses**

None.

8.0 **Assessment**

8.1. The proposed development of 21 houses is within the Barrymore area of Athlone, which is a rural area acting as a detached suburb north of Athlone. The area is characterised by a significant number of rural dwellings on large sites, primarily bungalow in form, with the land to the west of the appeal site comprising a cul-de-sac of 17 dwellings set out in a linear cul-de-sac layout. The Hodson Bay/Barrymore Area Plan applies to the area.

8.2. The appeal site is located within an area zoned New Residential within the Area Plan and adjoins an area zoned Residential Reserve. These are the only landbanks zoned for new residential development in the Area Plan with the remaining area comprising existing residential and other lands retained as 'transitional agricultural'. The area, including the proposed site, is serviced by public water and wastewater systems.

8.3. The primary issues for assessment include;

- Density
- Layout and Design
- Appropriate Assessment

Density

8.4. The proposed development is for 21 residential units on a site area of 2.41ha, which equates to a density of 9 dwellings per hectare.

- 8.5. The applicant states the area indicated for open space (approx. 2130sqm in area) cannot be developed for housing further to a condition of the contract of sale. This together with the link road reduces the overall density. 9 units per hectare compares to an existing density in this area of 4-5 units. The applicant states the overall masterplan for the site combined with the potential second phase to the north would provide a density in the region of 13 units per hectare. The Planning Authority has no issue with the density proposed.
- 8.6. The document Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas advises that in limited circumstances where pressure for development of single homes in rural areas is high, proposals for lower densities of development may be considered acceptable at locations on serviced land which offer an alternative to urban generated housing. The Hodson Bay/Barrymore Area plan identifies a density of 15 units per hectare is suitable for the area, subject to housing layouts conforming to the prevailing and appropriate densities established in the vicinity (policy 4.6).
- 8.7. While no masterplan has been submitted by the applicant, I note that a phase 2 of development is indicated for the site to the north on drawing 17.113-007 on lands which the applicant owns. While the density on the subject site is low, it is higher than the surrounding context and a case can be made for lower density given that this area is under pressure from urban generated demand for rural houses.
- 8.8. Overall, I consider the proposed density acceptable in the context of the restrictions on the site, the applicant's ownership and plans for the entire land block, and having regard to the Hodson Bay/Barrymore Area Plan 2014-2020, the rural character of this area, and the document Sustainable Residential Development in Urban Areas.

Layout and Design

- 8.9. The proposed development's integration with the surrounding area in terms of its layout and design is of importance given the character of this area and the undulating nature of the land. In this regard the development, in terms of the layout, topography and design of the dwellings are considered further hereunder.

Layout

- 8.10. The proposed development has one access from the local road/L-2021 adjoining the southern boundary. This access road is to become a 'Link Road' for local

connectivity, as identified in the Area Plan for the area. The Link Road traverses the site south to north and the Area Plan indicatively shows this road connecting into the existing road network further north, beyond the adjoining lands. There are two links indicated along the northern boundary of this site, which connect into the undeveloped lands to the north and will allow for future connectivity. I note on the indicative layout for the lands to the north (as shown on drawing 17.113-007), that no connection of the Link Road is provided for into the existing road network. This is an issue for a next phase of development / future application. I note the Planning Authority is satisfied that the Link Road can be delivered in an incremental fashion with this application delivering the first section.

- 8.11. Within the plan lands, there is one access off the eastern side of the Link Road serving a cul-de-sac comprising plots 1-14. To the western side of the Link Road are plots 15-21. To the rear of plots 15-20 is a rectangular plot of public open space/playground, which is accessed from the western side of the Link Road close to the entrance.
- 8.12. The applicant considers the proposed development is in line with national and local policy and it would be unsustainable to create a pattern of development in line with the existing area, which comprises detached dwellings on larger sites.
- 8.13. I have serious concerns in relation to the road/street layout, orientation of the dwellings on site relative to the street network, and the location of the public open space. No dwellings front onto the proposed Link Road, with blank side elevations of the dwellings and 1.8m boundary block walls onto the street. While footpaths have been provided on both sides of the street, there is lack of natural surveillance and passive supervision, resulting in issues of safety and security. The public open space is not directly accessible by any of the proposed dwellings and is also not overlooked, giving rise to safety issues, potential for anti-social behaviour and a poor quality open space. The design and layout of the dwellings relative to the street network and open space is contrary to national guidance contained within the document Sustainable Residential Development in Urban Areas and also section 9.6.7 of the Roscommon County Development plan which requires the maximum number of dwellings possible to overlook a communal open space.

8.14. While the appeal site is zoned for residential development and is serviced and capable of supporting housing, I consider the overall layout and dominance of road design over urban design, will result in a poor environment with a poor sense of place and lack of safety and security, contrary to national guidance as set out in the document Sustainable Residential Development in Urban Areas and contrary to the proper planning and sustainable development of the area.

Topography

8.15. The levels across the site are undulating, with the land rising up from the local road which is at an indicated level of 41mOD, to a high point of 46/47mOD midway across the site. There is a small area which rises steeply in the centre of the site with the level indicated at 50mOD and an ESB pole is positioned on top of this small section. There is evidence of cut in this area and some spoil deposited on the site. There are natural steep dips and rises in the land northwest of the midway ridge.

8.16. The applicant considers that the maximum road gradient of the Link Road, which is 1:75, is a gentle slope and within this the design of the dwellings follows the natural contours of the site.

8.17. I note the Link Road has a level of 41mOD at the access point, which rises to 41.6m midway within the site and rises to 42m at the northwestern boundary. The natural ground level is 47mOD at one point. When compared against the existing contour map and cross sections through the site, the Link Road appears to go through the highest part of the site, with significant cut required to reduce its level to between 41-42m. While the resulting road level may be considered a gentle slope, the level of intervention with the existing topography is of serious concern.

8.18. The finished floor level of the detached dwelling at the most western side of the site is indicated to be 43.3m, where the natural level at this point is 48m. A retaining wall is indicated around the northwest corner of the site, to the side of dwellings on plots 20 and 21. Section D-D on drawing 17.113-037 indicates the retaining wall is 2.4m high at the southern boundary with plot 21, which in my view is significant. No cross section has been submitted to indicate the height of the dwellings relative to the neighbouring dwellings at this boundary. Section 3-3 (drg no 17.113-011) shows a significant amount of cut proposed through the western side of the site, where plots 15-20/21 are located and section 2-2 drg no 17.113-010 shows the levels on the

eastern section of the site. No views of the site from the surrounding area have been submitted in order to have a clear understanding of the visual impact of the proposal when viewed from neighbouring roads/surrounding areas.

- 8.19. It is stated in the Roscommon County Development Plan that ‘the Council strongly urges development applicants to endeavour to derive a design that takes into consideration the specific characteristics of their site. For example the sites elevation, prominence, gradient and topographical features should be considered. The proposed design should complement the site rather than confront it’. While the applicant states that the design follows the natural contours of the site, I am not satisfied that the extent of excavated material proposed is justified and that the design has been informed by the existing natural topography. It would appear that to mitigate the visual impact of two storey dwellings, the natural topography has been significantly altered as a design solution, rather than a design approach which avoids the high points of the site at site layout stage and incorporates bungalow/dormer designs for those parts of the site which are elevated.

Design of the Link Road and other internal streets – New Issue

- 8.20. The Hodson Bay/Barrymore Area Plan identifies an indicative route for the Link Road to serve the wider area. The first section of the Link Road proposed as part of this application has a carriageway width of 5.5m and on either side has a verge of 3m width and a footpath of 2m width. The Link Road can be defined as a ‘local street’ in accordance with the Design Manual for Urban Roads and Streets. The width of the carriageway is in accordance with the recommendations as set out in that document. Two links into the adjoining land to the north are proposed and one cul-de-sac is also proposed, however these local streets serving the scheme are of the same scale as the proposed Link Road and from a legibility perspective, it is unclear from the design of the two link roads north which one is intended to function as the Link Road. I consider the scale of the two northern street links and the cul-de-sac street within the scheme results in a car dominant environment, is wasteful of land which is a finite resource, and would result in a poor urban environment for pedestrians, contrary to the Design Manual for Urban Roads and Streets.
- 8.21. There is a significant area of communal parking proposed to the front of the semi-detached dwellings on the east side of the proposed development. It is unclear why

this additional parking is required. The addition of a separate hard surfaced car parking area would in my view detract from the amenity of the area, result in unnecessary introduction of an excessive level of hardstanding area with resultant impacts on overall biodiversity and surface water run-off. There is adequate space within the site to cater for parking within the front garden areas of each of the dwellings and this area would be more appropriately used as an amenity space/landscaped area.

Design of the Dwellings

- 8.22. The applicant considers the introduction of semi-detached units offers a mix of dwelling types which is appropriate and more sustainable than detached units. The architect designed houses provide for a housing mix and is considered a sustainable design solution.
- 8.23. It is in accordance with national guidance and the Roscommon County Development Plan that a housing mix and variety in form is provided to cater for a mix of housing needs. This relates to the number of bedrooms per unit as well as the form, ie detached, semi-detached, two storey, dormer or bungalow. Of the 21 houses proposed, all are two storey in form and 8-9m high. 5 are detached and 16 are semi-detached, with the semi-detached form being uncommon in this area. There are 5 x 5 bed, 12 x 4 bed and 2 x 3 bed. While a mix of form is welcome, the design solution adopted should take into account the site characteristics and relationship with the adjoining lands and this is considered further hereunder.
- 8.24. The semi-detached units, type D, proposed are two-storey two-bay, with a pitched roof form and overall height of 9m. A variation of this design is proposed on plots 5 and 6, with a varied roof form. Type B is a detached version of type D with similar roof form and height. The overall height of the dwellings at 9m is high in the context of the surrounding area and the alternative design of the dwellings on plots 5 and 6, in particular the roof form, is incongruous with the design of the other semi-detached dwellings on the neighbouring plots 7-14. I have no objection in principle to the location of some semi-detached units within the scheme, in the interests of providing a mix of dwelling sizes, however dwellings should be designed to take account of local topography and they should be designed to sit within the existing landscape, as well as have due consideration of the existing context. It is my view that the

significant alteration of the levels across the site to accommodate a two storey design is an inappropriate design solution to an undulating landscape and contrary to sustainable design. As I observed within the area, there is a predominance of bungalow/dormer forms and where two storey dwellings exist they are generally on lower levels/at less visible locations. Furthermore the design proposed overall is very suburban in character. In my view the proposed design fails to take account of the existing topography and the development would be an incongruous insertion in the local landscape.

- 8.25. House types A and C, which face onto the local road/L-2021, are positioned approx. 28m-47m from the local road and are at a low point of the site. I note that a turning head is proposed within the significant green area to the front of the site bounding the local road, resulting in a poor breaking up of this green space. I am of the view that the proposed dwellings, which are at a low point of the site, while larger in scale than the existing dwellings along this road, could be acceptable at this location given their localised visibility, however integration with the surrounding area would require the creation of a strong landscaped edge to the site comprising the replacement of the existing roadside hedgerow, in addition to the planting of a significant number of native trees on the green space to the front of plots 1-4, which would contribute to the local character and support the local habitat. However, the lack of a detailed landscaping scheme and the suburban approach to the boundary treatment would result in overall an incongruous development within the local landscape.

Landscaping – New Issue

- 8.26. The applicant has submitted a landscape plan with the application. This plan shows the boundary treatment including some retained hedgerows/trees, public open space area and private gardens. A limited number of new trees are indicated on the layout. The applicant has not submitted an ecological survey or information in relation to the existing habitat and trees/hedgerows on site, or details of a proposed planting scheme. I note in particular one significant native tree along the southern boundary is proposed for removal and integration within this low density layout does not appear to have been considered.
- 8.27. Throughout the scheme 1.8m high block walls are proposed, particularly evident along large sections of the Link Road. Front boundaries of 1.2m high walls are

proposed to each dwelling. The boundary treatments to the dwellings do not reflect the rural character of the area with no planting proposed. I note that within other housing developments in the area, which comprise predominantly bungalow dwellings, an open front boundary plan exists and where front boundaries are in place they are planted or of open timber fence construction with planting, which softens the impact on the surrounding landscape and is supportive of the natural environment and local ecology. The heavily landscaped nature of the wider area is distinctly lacking within this development area and is contrary to objective 9.4 of the Area Plan. While the subject lands are capable of delivering housing to serve the local community, the proposed layout and design of this residential development would in my view be an incongruous insertion in the local landscape.

- 8.28. The roadside edge of the development to the south is very suburban in character, with proposed entrance pillars 3.89m high and a railing proposed in place of a hedgerow. The proposed entrance gives the appearance of entering into a private estate, whereas it is intended in accordance with the Area Plan that the road proposed will link through to existing roads in the future. Furthermore the Roscommon County Development Plan 2014-2020 states ornate precast concrete wall and pillar cappings should be avoided along with metal railings, and replacement of hedgerows should be sought for aesthetic and ecological reasons. The proposal in my view fails to integrate with the rural character of the area along this boundary.

Other Matters

Traffic and Sightlines

- 8.29. No traffic impact assessment or report from the roads section of the planning authority has been submitted with the application. I note under the previous application involving this site, PL20.240181, there were no concerns in relation to carrying capacity of the road network, with the reason for refusal relating to the six individual access points proposed onto the local road in that layout. This application proposes one access onto the L-2021. The removal of an existing hedgerow allows for 90m sightlines in each direction from the proposed entrance to the scheme.
- 8.30. Having considered the context of the Hodson Bay/Barrymore Area Plan, which envisaged this scale of development for the area and having examined the local road

context, I am of the view that the proposed development will not impact significantly on the local road network in terms of traffic generation and will not result in a traffic hazard.

Appropriate Assessment

- 8.1. The applicant did not submit an appropriate assessment screening document with the application and considers that the issue of Appropriate Assessment was previously addressed on the site under previous plans for the lands and previous applications. The Planning Authority considers there to be potential for indirect impacts through construction noise, accidental pollution from silt run-off, infiltration of ground waters etc and the Planning Authority is not satisfied based on inadequate information on the file that the proposed development would not be likely to have a significant effect on the Natura 2000 network.
- 8.2. The proposed development is not located within or adjacent to a Natura 2000 site and would not have a direct effect on any designated site. However, given the proximity of the site to Lough Ree SAC (000440) and SPA (004064), which lies approx. 450km east of the site, the possibility of indirect effects on those sites requires investigation. While the applicant considers Appropriate Assessment is not required, the Board as the competent authority is required to undertake a Stage 1 Screening given the proximity of the site to Lough Ree SAC and SPA. I note there are other Natura 2000 sites within a 15km radius of the site, however in the absence of direct source-pathway-receptor links and given the distances involved, I do not consider the proposed development will have a direct or indirect effect on other SACs/SPAs in the area. I consider further hereunder Lough Ree SPA and SAC.
- 8.3. The objective for Lough Ree SAC is to maintain or restore the favourable conservation status of habitats and species of community interest. The features of interest of Lough Ree SAC are: natural eutrophic lakes with Magnopotamion or Hydrocharition - type vegetation; semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (*important orchid sites); degraded raised bogs still capable of natural regeneration; alkaline fens; limestone pavements; old sessile oak woods with Ilex and Blechnum in the British Isles; bog woodland; and the species Otter.

- 8.4. The objective for Lough Ree SPA is to maintain or restore the favourable conservation condition of the bird species listed as Special Conservation Interests for this SPA. The features of interest of Lough Ree SPA are: Little Grebe, Whooper Swan, Wigeon, Teal, Mallard, Shoveler, Tufted Duck, Common Scoter, Goldeneye, Coot, Golden Plover, Lapwing, Common Tern, and the habit which supports them Wetland and Waterbirds.
- 8.5. The proposed development will be connected to the public water and waste water system and so could not significantly affect water quality in the SAC and SPA. Surface water is being addressed via the provision of a number of soakpits across the site. A risk of contamination could arise during the construction phase, with potential impacts arising from soil disturbance and run-off from soil and machinery entering the groundwater; during the operation phase, run-off from the site could also enter the groundwater. Standard construction management practices would be sufficient to avoid an indirect effect on water quality during construction and the applicant proposes a surface water drainage system utilising soakpits. Silt and hydro-carbon traps in the surface water drainage network from the outset of the construction and operational phase could be utilised as best practice and such measures are considered to be an intrinsic part of the work to be carried out. The operations phase of the development would not therefore be likely to have a significant effect on the SAC and given the distance from the site, I do not consider the proposed development would cause disturbance to the species to which the conservation interests of the SPA refer.
- 8.6. It is reasonable to conclude that on the basis of the information on the file, which I consider to be adequate in order to issue a screening determination that the proposed development, individually or in combination with other plans or projects would not be likely to have a significant effect on European Site No. 004064 (Lough Ree SPA), European Site No. 000440 (Lough Ree SAC) or any other European Site, in view of the site's conservation objectives, and that a Stage 2 Appropriate Assessment (and submission of a NIS) is not therefore required.

9.0 Recommendation

- 9.1. It is recommended that permission be refused for the reasons and considerations set out hereunder.

10.0 Reasons and Considerations

1. Having regard to the proposed alterations of the existing topography; the site layout which results in a lack of natural surveillance/passive supervision of the street network and public open space; in addition to the suburban character of the house designs; it is considered that the proposed development would constitute an unattractive and inappropriate housing scheme, which would not accord with the prevailing character of the area or contribute positively to the public realm, contrary to the 'Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas', 2009, and which would also conflict with the policies of the Roscommon County Development Plan 2014-2020, particularly sections 9.5, 9.5.3 and 9.6.7. The proposed development would therefore seriously injure the amenities of the area and of property in the vicinity, and would be contrary to the proper planning and sustainable development of the area.
2. The proposed development by reason of its road layout, scale and design, would provide for a road and estate layout that would militate against an attractive pedestrian environment and would generally fail to comply with the overall design approach and requirements, as set out in the 'Design Manual for Urban Roads and Streets' (DMURS), 2013. The proposed development would, therefore, constitute a substandard form of residential development that would seriously injure the amenities of the area and would be contrary to the proper planning and sustainable development of the area.

Una O'Neill
Senior Planning Inspector

5th June 2018