



An  
Bord  
Pleanála

## Addendum Inspector's Report ABP 301379-18

Following a meeting of the Board held on the 16<sup>th</sup> of October 2018 an addendum Inspector's report was required to address the matters of housing need and public health.

### (1) Housing Need

- With regard to compliance with rural housing policy the proposal should be in accordance with the provisions of the Sustainable Rural Housing Guidelines and the provisions of the Wexford County Development Plan 2013 – 2019, as it relates to settlement in rural areas. The appeal site is located in an area identified as an Area Under Strong Urban Influence on Map No.1 – Indicative Outline of NSS Rural Area Types in the Sustainable Rural Housing Guidelines. These areas are typically close to larger urban centres which are under pressure for housing in the countryside and have road networks which are heavily trafficked. The guidelines suggest that certain classes of persons e.g. those occupied full time or part-time in agriculture, forestry, those who are an intrinsic part of the rural community, sons/daughters of farmers and returning emigrants, may be considered for housing in the countryside.
- Chapter 4 of the Wexford County Development Plan 2013 – 2019 sets out policy in relation to rural housing. The site at Templescoby, Enniscorthy, Co. Wexford is located within an area designated as being a “Strong Urban Influence” in Map 6 attached to the development plan. Objective RH01 refers

to 'Areas under Strong Urban Influence' and states that it is an objective of the Council to facilitate the development of individual houses in the open countryside in 'Areas under Strong Urban Influence' in accordance with the criteria laid down in Table No. 12 subject to compliance with normal planning and environmental criteria and the development management standards laid down in Chapter 18.

- For the purposes of assessing what classes of persons should be facilitated in rural areas "local rural people" are considered to be those who fulfil the criteria set out in Table 12 of the plan. These are persons who were born or who have lived in an area for 5 years, persons who have lived there in the past or are returning emigrants, those who were born in a rural area but are now within a settlement or zoned land, persons who have links by virtue of being a long term rural landowner or the son or daughter or successor of such a person. The local rural area has a radius of 7km from where the person has lived or is living. It is advised in the plan that people who have a 'housing need' are considered to be people who have never owned a rural house.
- The applicants are Mr Norman and Mrs Jnana Cashe. The site is owned by Mr Eddie Cashe the father of Mr Norman Cashe. It is stated in the application form that the applicants do not own a home and that they qualify as first time buyers. The letter submitted with the application from Ennis Martin Architecture, Design and Planning Consultants on behalf of the applicants states that they are currently living in a rented house in Blackstoops, Enniscorthy. The letter states that previously Mr Norman Cashe lived with his parents, including for over 15 years at Templecoby. Mr Cashe is a self-employed plasterer and he is works within Co. Wexford.
- On the basis of the information provided on file, the applicant Norman Cashe has demonstrated that he has a housing need for the specific area, that he is

the son of the landowner and I conclude therefore that the applicants have demonstrated that they falls into a category provided for in objective RH01 and table 12 of the Wexford Co. Development Plan 2013-2019. Therefore, I conclude that the applicants meet the qualification criteria to build a rural dwelling at this location in accordance with the provisions of the Development Plan and the provisions contained in the Rural Housing Guidelines.

## (2) Public Health

- It is proposed to install a Biocrete secondary wastewater treatment system and polishing filter. It is proposed to locate the treatment plant circa 40m to the south-east of the dwelling and the percolation is located on the layout plan 45m to the south-east of the dwelling. It is proposed to locate a well 30m to the north of the dwelling. Table 6.1 of the EPA Manual – Treatment Systems for Single Houses sets out the minimum separation distances, the minimum distance from a watercourse or stream to a percolation area is stated as 10m and the minimum distance from a road to the percolation area is stated as 4m. There is a stream located 140m to the south of the site. Bedrock was encountered up to a depth of 1.7m below ground level during the site testing.
- The site suitability assessment indicates that a T value of 1.14 was recorded on site. Table 6.3 of the EPA Manual – Treatment Systems for Single Houses sets out the interpretation of percolation test results. A T value which is less than 3 means that retention time in the subsoil is too fast to provide for satisfactory treatment. It is stated in the manual that P-test should be undertaken to determine whether the site is suitable for secondary treatment system with polishing filter with  $3 \leq P \leq 75$ , at ground surface or overground.

- P tests were also carried out and a P value of 9.75 was recorded. It is proposed to construct a raised polishing filter from imported permeable soil with an area of 81sq m. It is proposed to discharge the treated effluent to ground water. It is proposed to construct a raised polishing filter from imported sand. The proposed sand polishing filter has a thickness of 900mm between the 300mm gravel base, gravel layer above and the topsoil. Overall the proposed mounded polishing filter has a height of circa 1.9m. It is proposed to discharge the treated effluent to ground water.
- A Hydrogeological Assessment prepared by Integrated Engineering Consulting was submitted with the application. The purpose of the report was to assess the risk to water quality in the area including nearby wells. The site is located within an area classified by GSI as a regionally important aquifer with extreme vulnerability. The groundwater protection response is R2<sup>2</sup>. As per the EPA manual, in a R2<sup>2</sup> protection zone, on site effluent treatment would be acceptable subject to normal good practice and ensuring that there is a minimum thickness of 2m unsaturated soil/subsoil with P/T values from 3 to 75 (in addition to the polishing filter which would be a minimum depth of 0.9m) beneath the invert of the polishing filter.
- The proposed treatment system is a secondary system and a sand polishing filter. The groundwater flow direction was established in the Hydrogeological Assessment. The 100 day time of travel calculation of groundwater was established and the zone of contribution calculation indicated that the zone of contribution for neighbouring wells lies outside the percolation area. While it is stated that there are neighbouring wells with 100 day travel time distance of the proposed percolation area, there are no wells directly downgradient and therefore the risk posed by the proposed percolation area on neighbouring wells is negligible. It is concluded in the report that if a mounded sand polishing filter is used for the wastewater

discharge system in addition to a secondary treatment system that it should be suitable for the site given the results of the T and P tests.

- The report of the Senior Executive Scientist dated the 22<sup>nd</sup> of January 2018 states that permission was previously refused for a dwelling on the site under PA Reg. Ref. 20170219, based on the extreme rapid percolation rate and bedrock recorded at 1.7m below ground level and the potential risk posed by the proposed development to private wells in the vicinity. In order to address the previous refusal the applicants employed IE Consulting to carry out a hydrogeological assessment. It was concluded in the hydrogeological assessment that the risk posed by the proposed percolation area on neighbouring private wells down gradient is negligible. The Senior Executive Scientist recommended that permission be granted subject to conditions, including that a certificate confirming the correct installation of the percolation area/polishing filter be submitted to the Council for written agreement.
- Having regard to the information submitted including the site characterisation report, Hydrogeological Assessment, report of the Senior Executive Scientist and the proposal to install a secondary treatment system with mounded sand polishing filter, I consider that site is suitable for the proposed on site secondary effluent treatment system subject to the system being constructed and maintained in accordance with the details submitted.
- In conclusion, having assessed the issues of housing need and public health, I would recommend that as per my previous recommendation that permission be granted for the proposed development.

(Note: The matters of housing need and public health are new issues not raised in the third party appeal. Accordingly, the Board may wish to circulate notices to the parties for further comment.)

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Siobhan Carroll  
Planning Inspector

18<sup>th</sup> of October 2018