



An
Bord
Pleanála

Inspector's Report ABP-303507-19

Development	Construction of 17 houses on existing foundations of previously approved planning reference 04/1384.
Location	Granard, Co. Longford.
Planning Authority	Longford County Council
Planning Authority Reg. Ref.	1820
Applicant(s)	Bernard Farrell.
Type of Application	Permission.
Planning Authority Decision	Grant.
Type of Appeal	Third Party
Appellant(s)	Pauraic Matthews.
Observer(s)	None.
Date of Site Inspection	12 th April 2019.
Inspector	Karen Kenny

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1.0 Site Location and Description

- 1.1. The appeal site is in Granard, Co. Longford. The site, with a stated area of 0.327 hectares, forms part of a larger backland site to the rear (north) of Granard Main Street. The site faces the rear gardens of properties on Main Street and the foundations from a previously approved residential and retail development (PA Ref. 04/1384) are in situ on the site. There is an unfinished public car park and shopping centre to the immediate north (04/1368). A mixed-use housing and retail scheme was commenced on lands to the west but was not progressed beyond initial site works (PA Ref. 04/1329). There is a completed retail and residential development on lands to the south west (PA Ref. 04/1164).
- 1.2. The development would be accessed (via the unfinished development) from Market Street to the south west and from an existing link road to the north east.

2.0 Proposed Development

- 2.1. Permission is sought for the construction of 17 no. terraced and semi-detached houses on the foundations of a previously approved retail and residential development. The development, as amended at further information stage, comprises the following:
 - 8 no. 2 bed houses (single and two storey), 6 no. 3 bed houses (two storey) and 3 no. 4 bed houses (two storey).
 - 14 no. car parking spaces in a communal parking court to the rear of the dwellings and 10 no. on street car parking spaces to the front of the dwellings.
 - Completion of roads / footpaths and other ancillary works.

3.0 Planning Authority Decision

3.1. Decision

Grant permission subject to conditions. The following conditions are of note:

Condition no. 5: Revised road design details to be submitted for agreement. Details include storm water drainage details and road design details.

Condition no. 6: Applicant to sign a connection agreement with Irish Water prior to commencement of development. Foul drainage and watermain details to be revised. The foul sewer to be increased in size and gradients to be reviewed and agreed with Irish Water. Applicant to liaise with consultant for the adjacent proposed development to the west of site, so that common foul sewer can be installed for both developments. The watermain to be increased in size. Drawings of these updates to be submitted for agreement.

3.2. Planning Authority Reports

3.2.1. Planning Reports

- Following an initial assessment further information was sought in relation to the design and condition of roads, footpaths and car parking areas, the condition and design of underground services and utilities, the management of invasive alien species (Japanese Knotweed), land ownership and the design of the scheme.
- The Planner's Report following receipt of further information concludes that having regard to the residential / commercial zoning that it is considered that the proposed development is acceptable.

3.2.2. Other Technical Reports

Road Design: Information required in relation to the finished level of Road 1, design of junction with "connection road", capacity of proposed stormwater drain to cater for wider development, location of stormwater attenuation under a public road and its capacity to cater for wider development.

Fire Department: No stated objection.

3.3. Prescribed Bodies

Irish Water: No objection, subject to conditions

3.4. Third Party Observations

A total of 4 no. observations were received. The issues raised are summarised as follows:

- Land ownership and legal interest.
- Development description.
- Works outside of application site.
- Adequacy of drawings (inc. levels shown).
- Architectural, Zoning and Streetscape Issues.
- Traffic.
- Drainage.
- Landscaping.
- Environmental matters and energy sustainability.
- Building control.

4.0 Planning History

4.1.1. The following planning history pertains to the appeal site:

PA Ref. 04/1384: Permission granted for 23 townhouses, 3 no. retail units and 5 no. apartments.

4.1.2. There is a complex planning history and fragmented landownership in the area to the rear of Main Street. The planning history is summarised as follows:

Lands to the West of the Site:

PA Ref. 18/25: Permission refused for 17 no. dwellings on lands to the west of the appeal site. The reasons for refusal related to (1) prematurity pending the completion of services, footpaths, lighting or a coordinated approach for completion

of same, (2 and 3) substandard layout, design and connections and (4) failure to mitigate invasive species on site. Permission had previously been granted on this site under PA Ref. 04/1329 for a mixed-use retail, office and residential development, under PA Ref. 07/935 for 16 no. dwellings and under PA Ref. 08/518 for 17 no. dwellings (inc. Old Person Dwellings).

PA Ref. 16/88: Permission granted for 10 no. Old Person Dwellings on site to the rear of the former Ulster Bank building and to the immediate west of the site of PA Ref. 18/25.

PA Ref. 05/282: Permission granted for roads on lands to the immediate west of the appeal site.

Lands to the North:

PA Ref. 04/1332: Permission granted for 4 no. industrial units on lands to the north of the appeal site. This development is completed and is accessed from the roadway that runs to the east of the appeal site.

PA Ref. 04/1368: Permission granted for commercial development comprising a shopping centre, 5 no. retail outlets with office space over and 170 no. car parking spaces (in addition to a public car park of 164 spaces being constructed by Longford County Council) on lands to the north of the appeal site. The structure of the retail / commercial building and car park is in place.

Lands to the South of the Site

PA Ref. 04/1164: Permission granted for 2 no. retail units, 4 no. duplex units and 10 apartments on lands to the rear of the Greville Arms Hotel. This development is completed.

Lands to the East of the Site (adj. to Eircom Exchange)

PA Ref. 04/923: Permission granted for demolition of 8 no. derelict houses and the construction of 22 no. houses on a site to the north of the appeal site.

PA Ref. 04/925: Permission granted for 4 no. houses on a site to the north of the appeal site adjacent to the development approved under PA Ref. 04/923.

No works have been undertaken on foot of these permissions.

5.0 Policy and Context

5.1. Development Plan

The Longford Development Plan 2015-2021 is the relevant statutory plan. The following provisions of the Development Plan are considered to be relevant:

- The site is zoned commercial / residential with an objective “to primarily provide for commercial / retail development with a possible element of residential development”.
- The zoning text states that “*development carried out under this zoning should have regard to the dual use of the zoning, and, in particular, shall have regard to the retail policy for the County. Developers should be cognisant of the high-profile locations of this zoning and design, siting and materials should be chosen accordingly...*”.

- Section 3.2 of the Development Plan sets out requirements for residential development within settlements. The following extracts are considered to be relevant:

Objective HOU DS 3

(b) Developments should reflect existing development patterns in terms of density, scale, layout, design and material finishes. Where appropriate, village/ town houses shall be required to be built up to the footpath in order to maintain existing or establish new building lines in the interest of the settlement structure and character.

(d) New residential developments in towns and villages will generally be required to provide open space at a minimum rate of 15% of the total site area.

(e) Individual sites will generally be required to provide minimum back garden lengths of 11 metres.....

Objective HOU DS 5 Design Standards

(c) Design solutions should be employed to minimise overlooking / overshadowing and to preserve and enhance the residential amenity of the entire development.

(f) Private open space to the rear of dwellings shall be provided at a minimum of 11 metres in length, extending for at least the width of the dwelling unit. In the case of detached and semi-detached dwellings, this space should be accessible by pedestrians other than through the house. This private open space requirement may, in exceptional circumstances, be reduced in town and village centres and areas of higher residential densities where a satisfactory public open space/recreational, congregational area is provided.

Objective HOU DS 6: Layout and Density

(a) Road layout in housing areas shall be designed in accordance with “Recommendations for Site Development Works for Housing Areas” (DoELG, 1998) or any subsequent update, and parking shall be provided in accordance with development plan standards.

(b) Generally, density should reflect the existing and traditional character of the settlement. In line with the “Sustainable Residential Development in Urban Areas: Guidelines for Planning Authorities” (DoEHLG, 2008) or any subsequent update, higher densities shall be permitted in urban and town centres, particularly in areas with close proximity to rail lines and other modes of public transport. In all other cases, the density of developments will be assessed on a site by site basis....

(c) Layouts should reflect the existing town or village character. In the case of proposed developments that have a street frontage, the developer may be required to build houses in accordance with the existing building line in order to retain the built fabric of the settlement and reinforce its physical structure. Similarly, where the structure of the settlement requires it, courtyard type developments may be appropriate....

(d) In the design of proposed developments, consideration shall be given to the provision of access to adjacent lands and the overall traffic layout of the area.

Objective HOU DS 7: Public Open Space

(a) The developer will normally be required to reserve 15% public open space in association with new developments (this requirement may be relaxed in conjunction with areas of higher density as outlined above) and/or may be required to contribute (either financially or with land) towards the assembly of a larger public park for the benefit of the settlement as a whole.

(b) In exceptional cases in smaller developments (eight houses or less), hard or soft landscaped play lots of a minimum size of 0.1 ha may be provided in lieu of public open space.

(h) The above requirements may be relaxed in certain instances, for example in developments consisting of Sheltered Housing or OPDs.

Section 5.1 Transportation

- Objective PKG 7: Cycle Parking will normally be required in development schemes and the Council shall promote and encourage the provision of cycle spaces in public car-parks and appropriate locations in towns and villages throughout the County. Where appropriate, cycle spaces shall be provided in prominent and secure locations convenient to building entrances.
- Objective PKG 10: Parking provision shall normally be provided in accordance with the standards outlined in the table entitled 'Parking Standards'.
- Table 5.3 Car Parking Standards. Houses have a stated requirement of 2 spaces per dwelling, while apartments have a stated requirement of 1.25-2 spaces per unit.
- Objective PKG 12: It is the policy of the council to support the Government's Electric Transport Programme by facilitating the roll-out of charging infrastructure for electric vehicles.
- Chapter 6 Objective CHAR 1: It is the policy of the Council that areas of vacant, derelict and under-used land within existing built-up areas (Brownfield sites) should be brought into productive use, as an alternative to the use of Greenfield sites which inevitably involves some loss of natural resources.

5.2. Natural Heritage Designations

None.

5.3. Other Heritage Designations

The site is within an area of archaeological potential around Recorded Monument LF010-055 (Historic Town).

5.4. EIA Screening

- 5.4.1. Having regard to the nature and scale of the proposed development of housing on zoned and serviced land and nature of the receiving environment, there is no real likelihood of significant effects on the environment arising from the proposed development. The need for environmental impact assessment can, therefore, be excluded at preliminary examination and a screening determination is not required.

6.0 The Appeal

6.1. Grounds of Appeal

A third-party appeal has been received. The grounds of appeal can be summarised as follows:

- Application incomplete; does not comply with proper planning and design standards (ref. to streetscape and private open space provision); does not address issues raised in request for further information; and does not account for future or adjacent developments or roads.
- Planning conditions require significant changes to the scheme to be agreed post decision.
- Land ownership and legal interest not demonstrated, and wayleaves not shown. The development uses roads, paths, carpark, walls, utilities and services surrounding the proposed development site and proposes to install services and drainage infrastructure under these roads, which are outside of the applicant's ownership. No consent from the installer of these services.
- The development is not compatible with the commercial / residential zoning objective which states that development should have regard to the dual use of the zoning.
- The proposed development is a small part of the overall development. The applicant was requested to carry out an overall Masterplan for roads / services. This has not been provided.
 - Road design issues raised in the request for further information were not addressed. This is highlighted in the Roads Department Report.

- The proposed road alignment does not tie-in vertically or horizontally with existing or future road links in the area.
- The public road link is a major infrastructure project for the town of Granard. The proposed roads do not comply / match the masterplan for the area agreed under PA Ref. 04/1384. The proposed design is not coordinated with adjacent landowners and does not comply with the Councils or TII standards and specifications.
- The Traffic Impact Assessment and Road Safety Audit fail to take account of other developments in the area. The overall masterplan incorporates a total of 70 new dwellings, a 42,000 square foot commercial premises, 4 no. existing industrial units and public and private car parking of c. 139 no. private and 145 no. public spaces and a new public link road.
- Services are designed to cater for the proposed development only and do not take account of future developments.
- Development is premature.
- The applicant has not committed to financing infrastructure surrounding the development.
- The applicant has not removed the invasive species from the site. A visual inspection shows patches of Japanese Knotweed on areas of the site.
- Requirements of previous permission not included within the notification to grant permission including Archaeological Impact Assessment, scheme for maintenance of common areas, gates, cycle path and footpath, car parking contributions, or a special contribution.
- Procedural matters raised in relation to access to information, development description, Part V information, consideration of departmental reports and submissions made.

6.2. Applicant Response

A response has been received on behalf of the applicant from ARC Architectural Consultants Limited. The response can be summarised as follows:

- The application was validated, and a response was made to the request for further information to the satisfaction of the by the Planning Authority.
- In terms of development description, the regulations do not require demolition of the extent proposed to be included in the project description. The number and type of units proposed are described.
- Legal proof of ownership was submitted at RFI stage and letters of consent were submitted from two owners of lands within the red line boundary (inc. Longford Co.Co).
- The proposals for complying with Part V are clear. All units are proposed to be used as social housing and as such, no requirement for Part V arises.
- No information has been withheld from the file.
- The site is zoned “commercial / residential” with the aim to provide for a mix of commercial and residential development in the town centre. The majority of the area zoned “commercial / residential” is centred on the Main Street which is ‘primarily’ in commercial or retail use. The site is a backland site and is close to an area zoned industrial and to the east of an established residential area. The applicant has an interest in a number of sites adjoining the application site and has prepared a Masterplan for the wider landholding to include elements of commercial and residential development. The approach to this site is considered to be consistent with the zoning objective and is accepted by the Planning Authority. The Development Plan strongly supports residential development within Granard, a Key Service Town and Tier 2 in the Settlement Hierarchy. The NPF seeks to direct new residential development to lands within “existing urban footprints” and to strengthen and diversify rural towns to be a focus for local housing and employment growth.
- In terms of streetscape, much of the lands in proximity to the site have a similar character with two storey terraces. The subject proposal comprises a suitable design response to this intermediate zone between town and three storey commercial buildings to the south, established two storey housing development to the east, the permitted one and two storey developments to the west and commercial development to the north. The NPF refers to

residential development is rural towns responding to the character, scale and density of the town.

- The appeal refers to a small section of road near the application site, which was constructed after the subject application was made. The applicant seeks permission for a road, as agreed with the local authority and approved by the Planning Authority. It is intended that neighbouring developments would tie into this road. The applicant is willing to accept a condition requiring any amendments to the road layout or requiring any outstanding details to be agreed with the Roads Department.
- If the Board consider the location of the stormwater attenuation tank inappropriate the applicant would be willing to accept a condition requiring that the tank be located to the rear of the houses.
- The Traffic Impact Assessment sets out assumptions for traffic growth in Granard (Section 4.2).
- Car parking a rate of 1.4 spaces per dwelling is proposed. This is consistent with national policy set out in the NPF (NPO 13) which states that “In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well-designed high-quality outcomes in order to achieve tartarated growth”. It is not appropriate or consistent with national policy to require 2 no. car parking spaces for each dwelling given the sites location within a Key Service Town.
- An attached letter confirms that Invasive Alien Species disposal was carried out on the site in September 2018. While evidence of Japanese Knotweed was identified on a grass verge within the red line boundary, this area is subject to a continuing eradication programme.

6.3. **Planning Authority Response**

None.

6.4. **Observations**

None.

7.0 Assessment

7.1. I have read the appeal file, all associated reports and plans and visited the appeal site and the surrounding area. I consider that the key issues for consideration in the appeal are as follows:

- Background and Planning History
- Principle of Development
- Design and Layout
- Residential Standards
- Other Issues

7.2. Background and Planning History

7.2.1. The appeal site is part of a larger backland area zoned “commercial / residential” to the rear of Granard Main Street. There is a fragmented landownership and complex planning history in this area. In order to allow for a comprehensive assessment of the proposed development, it is considered necessary firstly to set out details of the planning history pertaining to the area.

7.2.2. Permission was granted on the appeal site in 2005 (PA Ref. 04/1384) for 23 townhouses, 3 no. retail units and 5 no. apartments. The foundations of this development have been constructed along with some civil works and the site was in an unfinished state at time of inspection.

7.2.3. Permission was granted in 2005, on lands to the immediate north of the appeal site (PA Ref. 04/1368) for a commercial development comprising a shopping centre, 5 no. retail outlets, office units and 170 no. car parking spaces in addition to a public car park of 164 spaces being constructed by Longford County Council. The shell of the shopping centre is in place and the adjacent public car park has been constructed, however, the final surfacing is not in place. Drawing FL 17-194-07 submitted at further information stage, indicates that the shopping centre site is part of a wider landholding that includes the appeal site. The ownership of the public car park is not detailed.

- 7.2.4. Permission was granted in 2005 (PA Ref. 04/923 and PA. Ref. 04/925) on lands to the east of the site for a total of 26 no. dwellings. No works would appear to have been undertaken on foot of these permissions. Drawing FL 17-194-07 submitted at further information stage, indicates that part of this site forms part of a wider landholding that includes the appeal site.
- 7.2.5. On lands to the immediate west, permission was granted in 2005 (PA Ref. 04/1329) for a mixed-use retail, office and residential development. Permission was later granted in 2007 and 2008 (PA Ref. 07/935 and PA Ref. 08/518) for residential schemes on this site. Some foundations and civil works were undertaken, and the site was in an unfinished state at time of site inspection. In 2018, permission was sought (PA Ref. 18/25) for 17 no. dwellings on this site. The planning authority refused permission due (inter alia) to prematurity pending the completion of services, footpaths and lighting in the area or a coordinated approach for completion of same. In 2017 permission was granted (PA Ref. 16/88) for 10 no. Old Person Dwellings on an adjoining site to the rear of the former Ulster Bank building.
- 7.2.6. Permission was granted in 2005 (PA Ref. 04/1164) for a retail and residential development (2 no. retail and 14 no. apartment / duplex units) on lands to the rear of the Greville Arms Hotel on Main Street. This development is largely completed and appeared to be partially occupied at time of inspection.
- 7.2.7. The outline of a road network is in place. The road to the east is completed and open to the public. The roads to the south, west and north of the site are constructed, however, final surfacing, footpaths and public lighting are not in place. The unfinished roads and verges within the appeal site are in the ownership and control of Longford County Council (Drawing No. PL 17-149-08 refers).
- 7.2.8. The appeal site forms part of strategic backland site within the urban area of Granard. I would note that there is no overarching framework plan, or development objectives in the Development Plan, for this area.

7.3. Principle of Development

- 7.3.1. The Longford County Development Plan 2015-2021 is the relevant statutory plan. The site is zoned “commercial / residential” with an aim “to primarily provide for commercial / retail development with a possible element of residential development”.

The Development Plan states that development should have regard to the dual use of the zoning (Appendix 1B Granard Zoning Policy).

- 7.3.2. The subject site is a backland site to the rear of Granard Main Street. Residential development is permissible under the land use zoning objective. In terms of the dual zoning, I am satisfied that there is a good mix of land uses on lands zoned “commercial / residential” and that the proposed development would not contravene or undermine the zoning objective. On the basis of the foregoing, I am satisfied that the proposed development is acceptable in principle.

7.4. **Design and Layout**

- 7.4.1. The Sustainable Residential Development in Urban Areas, Guidelines for Planning Authorities (DECLG 2009) state that the scale of new residential schemes in small towns and villages¹ should be in proportion to the pattern and grain of existing development. I consider the proposed development by reason of its scale, design and character to be in keeping with the character of the area and appropriate to the transitional location between the Main Street and established housing.
- 7.4.2. The grounds of appeal raise concerns in relation to the architectural treatment of the blocks and in particular the proposed streetscape. The design includes direct frontage onto the street, stepped ‘A’ line roofs and simple elevations that include a mixture of render and brick finishes. I consider that the overall design provides a suitable architectural response.

7.5. **Residential Standards**

- 7.5.1. The size and configuration of the appeal site presents challenges in terms of meeting Development Plan standards as discussed below. In the case of urban sites, such as this, the National Planning Framework (NPO13) recommends that planning and related standards are based on performance criteria that seek to achieve well-designed high-quality outcomes (as opposed to the rigid application of standards). This is reflected in the Sustainable Residential Development in Urban Areas Guidelines (Section 6.10).

¹ Population of less than 5,000.

- 7.5.2. I consider that development standards should be considered in the first instance, and where standards are not met consideration needs to be given to the overall quality of the development. I would note that the grounds of appeal raise specific concerns in relation to car parking and open space provision.

Car Parking

- 7.5.3. A total of total of 24 no. car parking spaces are proposed at a rate of 1.4 spaces per house. This is substantially below the Development Plan standard of 2 spaces per dwelling. The appeal response states that it is not appropriate or consistent with national policy to require 2 no. car parking spaces per dwelling given the sites location within a Key Service Town. While reduced provision could be considered, I would note that there is no public car parking in this area and that access to public transport services, employment and higher order services and facilities is limited. The piecemeal approach to the redevelopment of the backland area is relevant in my view. While there is a partly completed 'public car park' on lands to the immediate north of the site, the ownership and intended future use of this area is not clear. Furthermore, the car parking demand of the overall area is not clear. In the absence of greater clarity and certainty in relation to the wider area, I consider the level of 'on-site' car parking provision to be inadequate.

Private and Public Open Space

- 7.5.4. In terms of private open space provision, Objective HOU DS 5 of the Development Plan states that rear gardens of "*a minimum of 11metres in length, extending for at least the width of the dwelling unit*" are required. There is no stated minimum area. The objective states that provision may be reduced in exceptional circumstances, in town and village centres where satisfactory public open space or recreational space is provided. In terms of public open space, Objective HOU DS 7 of the Development Plan states that open space will generally be required at a minimum rate of 15% of the total site area and that this standard may be relaxed in areas of higher density.
- 7.5.5. Private open space is provided to the rear and side of each dwelling. The level of provision is summarised in the Floor Area Schedule on Drawing No. FI 17-194-01. The garden areas vary in size from 101 square metres to 35 square metres. While the gardens of dwellings no. 7 to no. 13 are generally acceptable, dwellings no. 1 to no. 6 have patio style gardens of between 52sq.metres and 35 square metres in

area. In the case of dwellings no.1-3 the gardens are accessed through a bedroom. The depth of these private gardens is significantly below the Development Plan standard. Furthermore, the proposed development does not include any public or communal open space to compensate for the reduced provision. While reduced provision can be considered in town centres, I am of the view that reduced provision cannot be justified in this instance due to the lack of any alternative amenity space within the site and in the wider area.

Room Standards

- 7.5.6. I am satisfied that the internal space standards set out in the Development Plan are generally met.

Conclusion:

- 7.5.7. In the absence of adequate open space provision and car parking provision within the site and / or certainty in relation to provision within the wider area, I consider that the proposed development would represent a substandard form of residential development. I recommend that permission be refused on this basis.

7.6. **Other Issues**

Road Design and Traffic

- 7.6.1. The grounds of appeal argue that the submitted Traffic Impact Assessment fails to consider development proposed in the wider area. The scale of development proposed is modest and falls below the threshold that would automatically trigger the need for a Transport Impact Assessment based on the guidance set out in Table 2.1 of the Traffic and Transport Assessment Guidelines published by the NRA in 2014. I would also note that future year traffic growth is considered in Section 4.2 of the submitted TIA. Having regard to the position of the site on zoned lands within an urban area I am satisfied that the proposed development would not substantially affect the existing traffic situation in the area or undermine the operational capacity of road junctions in the vicinity of the site.
- 7.6.2. The roadways surrounding the development are incomplete. The site incorporates the unfinished roadways and it is proposed to complete these roads, to provide footpaths and public lighting and to connect to the wider street network. I am satisfied that the overall design of the road connections is acceptable and that it is

reasonable that the outstanding details in relation to levels and final design details are agreed with the Planning Authority prior to the commencement of development.

Drainage

- 7.6.3. I am satisfied that the drainage proposals detailed on the submitted engineering plans and particulars (attenuation tank and foul, surface water and water supply networks) are adequate to serve the proposed development. I would note that the proposed surface water and foul services are not adequate (both in terms of capacity and gradient) to serve the wider backland area. This suggests a piecemeal approach to the development of the wider landholding and the wider backland area.

Ownership

- 7.6.4. The grounds of appeal argue that development is proposed on lands that fall outside of the applicant's ownership and that the applicant has not demonstrated sufficient legal interest to make the application or undertake the works. The appeal also refers to the failure to detail wayleaves within the site or to consult with the original provider of the infrastructure. The applicant has submitted letters of consent from the owners of the site that consent to the making of the application. Details of wayleaves are also shown. I am satisfied that the applicant has demonstrated sufficient legal interest to make the application and that the proposed development does not encroach onto lands that fall outside of these consents. Furthermore, I would note that under Section 34 of the Act a person shall not be entitled solely by reason of a permission to carry out development and that a grant of permission does not of itself, allow development to proceed.

Archaeology

- 7.6.5. The site is within an area of archaeological potential around Recorded Monument LF010-055 (Historic Town). The previous grant of permission under PA Ref. 04/1384 required archaeological testing prior to the commencement of development. Extensive ground works has occurred in this area in the intervening period and I am satisfied that the monitoring of future ground works by a qualified archaeologist, would be sufficient to ensure the protection of any archaeological material that may exist. In the event that the Board is minded to grant permission, I recommend a condition to this effect.

Invasive Alien Species

- 7.6.6. Japanese Knotweed an Invasive Alien Species has been identified within the site. The appellant argues that this issue has not been adequately addressed. The appeal response states that while evidence of Japanese Knotweed was identified on a grass verge within the red line boundary, this area is subject to a continuing eradication programme and a letter is included from Knotweed Ireland Services that confirming that Invasive Alien Species disposal was carried out on the site in September 2018 and that subject to the completion of the programme there is not a dispersal risk. I am satisfied that works are ongoing to address the issue of Invasive Alien Species within the site. In the event that the Board is minded to grant permission a condition can be included to ensure that no works occur pending the completion of the eradication programme.

Part V

- 7.6.7. A letter submitted with the appeal from the Director of Housing of Longford County Council states that the overall development will be used for the purpose of Social Housing. I am therefore satisfied that issue of compliance with Part V of the Planning and Development Act are adequately addressed in the appeal response.

Procedural Matters

- 7.6.8. The appellant argues that the development description is inadequate. However, I am satisfied that the notices submitted with the applicant and at further information stage are sufficient to describe the nature and extent of works for which consent is sought and to alert third parties to the development. The purpose of the public notice has, therefore, been served in accordance with the requirements of the Planning and Development Regulations.
- 7.6.9. I consider that other procedural matters raised in the appeal in relation to access to information and the consideration of submissions and reports fall outside of the Boards considerations and are a matter for the Planning Authority.

7.7. Appropriate Assessment

- 7.7.1. Having regard to the nature and scale of development proposed and to the nature of the receiving environment, in particular its location in a serviced urban area, it is

reasonable to conclude that on the basis of the information on the file, which I consider adequate in order to issue a screening determination, that no appropriate assessment issues arise and it is not considered that the proposed development would be likely to have a significant effect individually or in combination with other plans or projects on a European site.

8.0 Recommendation

- 8.1.1. I recommend that planning permission be refused for the reasons and considerations set out below.

9.0 Reasons and Considerations

1. The site is part of a larger development area to the rear of Granard Main Street that is zoned “commercial and residential” in the Longford County Development Plan 2015-2021. The proposed development, by reason of its inadequate open space and car parking provision within the site or in the immediate vicinity, would conflict with the provisions of the Longford County Development Plan 2015-2021 in relation to open space provision and car parking and with the standards recommended in the "Sustainable Residential Development in Urban Areas: Guidelines for Planning Authorities 2009" published by the Department of the Environment, Heritage and Local Government. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.

Karen Kenny

Senior Planning Inspector

30 April 2019