



An
Bord
Pleanála

Inspector's Report ABP-304644-19

Development	Demolition of an existing two-storey house and to construct a two/ three storey apartment block consisting of 20 units, within the Foxrock Architectural Conservation Area.
Location	Carrigmore, Golf Lane, Torquay Road, Foxrock, Dublin 18.
Planning Authority	Dun Laoghaire Rathdown County Council
Planning Authority Reg. Ref.	D19A/0190
Applicant(s)	Victoria Homes Ltd.
Type of Application	Permission
Planning Authority Decision	Refuse Permission.
Type of Appeal	First Party
Appellant(s)	Victoria Homes Ltd.
Observer(s)	Michael Monaghan, Colin Barrett, Stephen & Sarah Daly, Eamon O'Shea & Brendan Phelan, Eugene & Lynette O'Sullivan, John & Ellen

Heeney, Alan & Carol Jones, Foxrock
Area Community & Enterprise Ltd.,
John Kennedy.

Date of Site Inspection

27th August 2019

Inspector

Paul O'Brien

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1.0 Site Location and Description

- 1.1. Carrigmore is a two-storey, detached house on the eastern corner of the junction of Torquay Road and Golf Lane, Foxrock, Co. Dublin, with a stated site area of 0.37 hectares. Access to the site is from Golf Lane and there is extensive roadside frontage along both Torquay Road and Golf Lane. Golf Lane provides access to Foxrock Golf Club. There is extensive tree and vegetation cover on site which screens the existing house from public view. The site boundaries consist of maintained mature hedgerows. The site is generally flat with no significant differences in level throughout.
- 1.2. The surrounding area is characterised by large detached houses on generous sized sites, with extensive landscaping screening them from public view. The site is located within the Foxrock Architectural Conservation Area (ACA).
- 1.3. Carrigmore is located to the north east of the site and is in part, within 5 m of this boundary. The front elevation of the house faces south west. The house appears to be in good condition and is habitable with a stated floor area of 134.6 sq m.
- 1.4. Public transport in the form of low frequency bus routes is available approximately 650 m to the north on Leopardstown Road, served by an hourly bus service. Westminster Road to the south which is approximately 530 m away is only served by one bus a day. The Stillorgan Road Quality Bus Corridor is circa 1.4 km from the site and the Luas is 1.6 km away, the nearest stop being at Central Park.

2.0 Proposed Development

- 2.1. The proposed development consists of the demolition of the existing house, 'Carrigmore' and for the construction of 20 apartment units in a single block. The proposed apartment block to be a mix of two and three storeys with basement car parking provided. The following unit types to be provided:
 - 4 no. 1 bed units
 - 8 no. 2 bed units
 - 8 no. 3 bed units

A total of 28 car parking spaces to be provided in the form of 23 within the basement and 5 at surface level. 68 no. bicycle parking spaces to be provided with 60 in the basement and 8 at surface level. The development to include all necessary site works, landscaping and bin storage. Access will continue to be from Golf Lane but will be revised to allow for separate vehicular and pedestrian access.

3.0 Planning Authority Decision

3.1. Decision

The Planning Authority decided to refuse permission for one reason as follows:

1. Having regard to the proposal for a basement level storage tank on site to discharge to the existing foul sewerage network during off peak periods the applicant has proposed pumping off-peak to the already deficient sewer. It is considered that in this regard the proposed development would be prejudicial to Public Health and would be premature until the deficiency in the system is addressed. The proposed development would therefore be contrary to the proper planning and development of the area.

NOTE: The applicant should note that are a number of issues discussed within the report that would need to be addressed should a further application be submitted.

3.2. Planning Authority Reports

3.2.1. Planning Reports

The Planning report reflects the decision to refuse permission for the proposed development, though concern is expressed with regards to a number of issues and not just the single reason for refusal. At a minimum, further information was required regarding the bulk/ scale of the development, impact on residential amenity, surface water drainage, transportation issues, tree removal and impact on the Architectural Conservation Area. The Case Officer considered that these matters would not warrant refusal. However, the concerns of Irish Water as expressed in their report regarding the provision of a basement level water tank to serve this development

were considered serious enough on their own for the Planning Authority to decide to refuse permission.

3.2.2. Other Technical Reports

Drainage Planning – Municipal Services Department: Further information requested regarding flooding in the area – need for a Site Specific Flood Risk Assessment, full details of surface water drainage proposals including revised pumping details, concern regarding foul drainage, full details of proposed green roof, status of ditch along Torquay Road boundary to be clarified and details on 100 year flood event.

Executive Conservation Officer: The demolition of the house is acceptable, and the height of the apartment block is also acceptable. Concern is expressed about the perceived bulk, mass and scale of the development which is out of character with the existing Foxrock Architectural Conservation Area (ACA). The proposal would result in over-development of this site and revisions should be proposed by way of a further information request. The Conservation Officer notes that *'The Foxrock ACA is coming under considerable development pressure which threatens its distinctive built and landscape character'*.

Parks and Landscape Services Section: Refusal recommended as the development would result in the loss of a significant number of trees, some of which may be outside of the red line boundary of the site.

Transportation Planning: Further information is requested in regards to a number of items including: Request a detailed Quality Audit, a detailed Transport Impact Statement, the reduction in car parking through a shortfall of four spaces is not acceptable in this location, details of bicycle and motorcycle parking, details of the basement car parking, provision of electric vehicle charging points, additional pedestrian access onto Torquay Road, details of vehicle access arrangement and manoeuvring, details of street lighting and a construction management plan to include traffic management.

3.3. Prescribed Bodies

Irish Water: Refusal recommended due to capacity constraints in the area and the use of pumping in the off-peak does not overcome this issue.

Department of Culture, Heritage and the Gaeltacht: Recommend that any clearance of trees and scrub only take place from the 1st of March to the 31st of August in any year so as to ensure the protection of nesting birds.

3.4. Objections

A significant number of objections were received with the Planning Authority case officer reporting a total of 51 submissions received. In summary the main issues related to:

- The development would be out of character with the area in terms of type of residential unit, height, bulk and design.
- The development would break the building line along Golf Lane.
- The development would have a negative impact on the Foxrock Architectural Conservation Area.
- Loss of trees and subsequent impact on natural heritage.
- Increased traffic congestion in the area.
- The area is already prone to flooding and the development will not improve this situation.
- Contravenes the Dun Laoghaire Rathdown County Development Plan 2016 – 2022 and National guidance.
- Type of housing will not encourage affordable housing into the area.
- Impact on the existing residential amenity and their value in the area.

4.0 Planning History

P.A. Ref. D17A/0160, ABP Ref. PL06D.248513 refers to a 2018 decision to refuse permission for the demolition of a house and for the construction of 8 no. three storey semi-detached houses at ‘Carrimore’, the site of this subject appeal. The An Bord Pleanála reason for refusal stated:

‘The proposed development by reason of its design, form, and layout, which includes the removal of a significant number of trees and development in close proximity to Torquay Road, would have a disproportionate and visually obtrusive impact on the character of the Foxrock Architectural Conservation Area and the setting of the adjacent Protected Structure to the south-east. The proposal would be contrary to Objective AR12 of the Dún Laoghaire-Rathdown County Development Plan 2016-2022 and would seriously injure the visual amenities of the area. The proposed development, would, therefore, be contrary to the proper planning and sustainable development of the area’.

5.0 Policy and Context

5.1. Development Plan

- 5.1.1. Under the Dun Laoghaire Rathdown County Development Plan 2016 – 2022, the site is zoned A ‘To protect and/or improve residential amenity’. Residential development is listed within the ‘Permitted in Principle’ category of this zoning objective’.
- 5.1.2. The site is located within the Foxrock Architectural Conservation Area’. The ‘Foxrock Architectural Conservation Area Character Appraisal’ sets out the character of the ACA and relevant planning requirements.

The following policies of the Dun Laoghaire Rathdown County Development Plan 2016 – 2022 are relevant:

AR12: Architectural Conservation Areas includes the following:

- i. Protect the character and special interest of an area which has been designated as an Architectural Conservation Area (ACA).*
- ii. Ensure that all development proposals within an ACA be appropriate to the character of the area having regard to the Character Appraisals for each area.*
- iii. Seek a high quality, sensitive design for any new development(s) that are complimentary and/or sympathetic to their context and scale, whilst simultaneously encouraging contemporary design.*

iv. Ensure street furniture is kept to a minimum, is of good design and any redundant street furniture removed.

v. Seek the retention of all features that contribute to the character of an ACA including boundary walls, railings, soft landscaping, traditional paving and street furniture.

AR13: Demolition within an ACA

It is Council policy to prohibit the demolition of a structure(s) that positively contributes to the character of the ACA.

Any such proposals will be required to demonstrate that the existing building is incapable of viable repair and reuse and should be accompanied by an Architectural Heritage Assessment, photographic survey and condition report.

- 5.1.3. To the south/ adjacent to the subject site is a protected structure – ‘Mandeville’ and is described as a ‘House’.
- 5.1.4. There is an objective indicated on the lands to the north ‘To protect and preserve Trees and Woodlands’.
- 5.1.5. The Flood Zone Maps – Map 6 indicate a Hotspot at the junction of Torquay Road and Golf Lane.
- 5.1.6. Chapter 2 – ‘Sustainable Communities Strategy’ of the Dun Laoghaire-Rathdown County Development Plan 2016 – 2022, includes section 2.1 ‘Residential Development’. The Introduction (2.1.1) refers specifically to how future population growth will be accommodated, with one model – ‘*Through the continuing promotion of additional infill accommodation in existing town and district centres at public transport nodes, brownfield sites and established residential areas*’.
- 5.1.7. Under 2.1.3.3 ‘Policy RES3: Residential Density*’ it is stated that ‘*In some circumstances higher residential density development may be constrained by Architectural Conservation Areas (ACA) and Candidate Architectural Conservation Areas (cACA) designations, Protected Structures and other heritage designations.*

To enhance and protect ACA's, cACA's, Heritage Sites, Records of Monuments and Places, Protected Structures and their settings new residential development will be required to minimise any adverse effect in terms of height, scale, massing and proximity'.

5.1.8. Under 2.1.3.4 'Policy RES4: Existing Housing Stock and Densification*' it is policy to:

- *Encourage densification of the existing suburbs in order to help retain population levels – by 'infill' housing. Infill housing in existing suburbs should respect or complement the established dwelling type in terms of materials used, roof type, etc.*
- *Actively promote and facilitate:*
 - *conversion of existing housing stock to accommodate a larger number of households - principally by subdivision of larger-than-average family houses - in well serviced urban areas.*
 - *development of mews buildings and other infill accommodation which is in harmony with existing buildings.*

5.1.9. Chapter 8 of the Dun Laoghaire-Rathdown County Development Plan 2016 – 2022 refers to 'Principles of Development' and the following are relevant to the subject development:

8.2 'Development Management' – with particular reference to section 8.2.3 'Residential Development' and 8.2.3.4 'Additional Accommodation in Existing Built up Areas'.

5.2. **National Guidance**

- 'Project Ireland 2040 - National Planning Framework' includes Chapter, No. 6, entitled 'People Homes and Communities' and which includes 12 objectives, the following are considered relevant to this proposed development:
 - National Policy Objective 27 seeks to ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments and integrating physical activity facilities for all ages.

- National Policy Objective 33 seeks to prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.
 - National Policy Objective 35 seeks to increase densities in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.
- *Design Manual for Urban Roads and Streets (DMURS)*.
 - *Sustainable Urban Residential Development Guidelines (DoEHLG, 2009)* and its companion, the *Urban Design Manual - A Best Practice Guide (DoEHLG, 2009)*.
 - *Quality Housing for Sustainable Communities (DoEHLG, 2007)*.
 - *Sustainable Urban Housing: Design Standards for New Apartments - Guidelines for Planning Authorities (DoHPLG, 2018)*

5.3. Natural Heritage Designations

None.

6.0 The Appeal

6.1. Grounds of Appeal

6.1.1. The applicants have appealed the decision of the Planning Authority and have engaged the services of McGill Planning to prepare the appeal. The following comment is made:

- The single reason for refusal was for pumping to an already deficient foul drainage network which would be prejudicial to public health and be premature pending the upgrade of the public system. The applicant states that they have contacted Irish Water and that the issue can be resolved. The applicant has suggested that the Board contact Irish Water under Section 131 of the Planning and Development Act 2000, as amended to make a formal observation on this issue.

- 6.1.2. The applicant notes that the Dun Laoghaire Rathdown case officer has referred to other issues that would have to be resolved before a grant of permission could be considered.
- Concern expressed about impact on the building line. The applicant notes this, however, the building line along Torquay Road is not clearly defined. The proposed development will not negatively impact on the character of the area.
 - The case officer considered that the separation distances between habitable rooms within the development, were unacceptable. The applicant has responded that the design and in particular the angle of the southern leg of the building away from the northern leg, ensures that adequate separation distance is provided. Terraces have similarly been designed to ensure that adequate privacy and residential amenity is provided. Separation distances of between 11.5 m and 16 m are proposed.
 - The applicant has noted that the Water Services and Transport Departments have raised matters as potential further information requests. However, the applicant considers that these matters are not material considerations and would not restrict the granting of permission for this small residential development.

6.2. **Planning Authority Response**

- 6.2.1. The Planning Authority response consists of a detailed report from Drainage Planning – Municipal Services Department. The response from the applicant is noted, however, concern has been expressed about the flooding hotspot in the area and the lack of detail as to how this can be addressed. A Site-Specific Flood Risk Assessment (SSFRA) would be required in this regard. The Drainage Planning section have therefore recommended that permission be refused due to potential flooding issues.
- 6.2.2. Other issues raised include comment on the proposed upgrade of the foul drainage network, no time lines or commitment to undertake the works have been given, therefore the development is premature.

6.2.3. Municipal Services of Dun Laoghaire Rathdown County Council would be opposed to communally owned/ managed foul drainage storage tanks and pumping systems.

6.2.4. A number of conditions have been suggested in the event that the Board grant permission.

6.3. **Observations**

6.3.1. Observations have been received from a number of those who originally objected to this development. The main planning issues include:

- Single reason for refusal is not adequate.
- The development would have a negative impact on the Foxrock Architectural Conservation Area (ACA).
- Inadequate regard was had to the Development Plan and the relevant sections that deal with the ACA.
- Do not agree with the Dun Laoghaire Rathdown County Council's Conservation Officer's suggestion to reduce the mass and bulk of the building by providing two separate buildings on site.
- Concern expressed about the lack of details regarding traffic in the area.
- Residents on adjoining sites may suffer a loss of privacy and residential amenity. Increased overlooking due to the height of the new development.
- The development will break a building line.
- Request for a 2 m high wall along the boundary of the site.
- Concern about flooding and the use of pumps.
- Impact on an adjoining protected structure.
- Contravention of National Guidelines.
- No evidence has been provided that the issue of the storage tank and pumping, has been addressed to the satisfaction of Irish Water.
- Impact on existing mature trees including those which may be outside of the red line boundary of the site.

- Mixed opinion on the demolition of this house though references to Policy AR13 of the Dun Laoghaire Rathdown County Development Plan 2016 – 2022 have been made and which prohibits the demolition of existing houses within the ACA.

6.4. Further Responses

6.4.1. Applicants

The applicant has submitted a response to the received observations and no new issues have been raised. A Flood Risk Assessment has been prepared by JBA Consulting and is included with this response. In summary the majority of the site is located within Flood Zone C, with only a section of the south-western corner and southern boundary within Flood Zone A. Proposed mitigation measures include engineering measures to control stormwater, a recommended freeboard of 150 mm to be provided, a revised access to the site such that surface water is directed away from the road and towards the green spaces within the development site, and the provision of a blue-green roof.

The applicant has made contact with Irish Water who have confirmed with the applicant that a connection to the network is feasible.

6.4.2. Planning Authority

The Planning Authority have reported that the submitted details do not raise any new matters.

6.4.3. Irish Water

Irish Water have reported (Report dated 26th July 2019) that a connection to the water network is feasible without upgrade, however there 'are significant wastewater constraints in the foul sewer in which this development proposes to connect'.

Modelling/ planning is underway to determine deficiencies and required upgrades with a Drainage Area Plan (DAP) available in Q4, 2019. Irish Water have also reported that they do not have any plans for upgrade works to the network in this area.

7.0 **Assessment**

7.1. The main issues that arise for assessment in relation to this appeal can be addressed under the following headings:

- Principle of Development
- Design and Impact on the Character of the Area
- Impact on Residential Amenity
- Infrastructure and Drainage
- Appropriate Assessment Screening
- Other Matters

7.2. **Principle of Development**

7.2.1. The proposed development consists of the demolition of an existing two-storey semi-detached house and the construction of a part two and part three storey apartment block consisting of 20 residential units. The site is zoned 'A' – Residential, in the Dun Laoghaire Rathdown County Development Plan 2016 – 2022 and notwithstanding the location within an Architectural Conservation Area (ACA), residential development of the nature proposed is acceptable in principle.

7.3. **Design and Impact on the Character of the Area**

7.3.1. The existing house on the site is an attractive two-storey unit. However, there is no restriction on its demolition/ removal. I note that the Dun Laoghaire Rathdown Executive Conservation Officer has reported no objection to the demolition of the house. The applicants have engaged the services of 'Anello Architects' to prepare a Conservation Report and this concludes that the existing house on site is of no particular merit worthy of preservation. I would concur with these comments.

7.3.2. The proposed new building is to be a mix of two and three storey with a maximum height of 10.65 m; the existing house has a stated height of 7.273 m. The design of

this apartment block is acceptable though the quality of finish will rely on the materials to be used and which are not clearly stated in the submitted documentation. In the event that permission was to be granted, final details can be agreed by way of condition. A mix of brick and selected fibre cement panel are indicated on the submitted elevational drawings, though these details are not sufficiently detailed.

7.3.3. 'Arborist Associates' have been engaged by the applicants to prepare an Arboricultural Assessment and also a tree removal/ retention plan, tree protection plan and tree constraints plan. A significant number of trees are proposed for removal within the centre of the site and also a number to the east/ west and south of the proposed building. A total of 42 of the identified 78 trees and some hedgerow are proposed for removal. No Category A trees were identified in the submitted assessment. A landscaping plan prepared by Mitchell + Associates is included with this application and provides for some replacement tree planting.

7.3.4. The project architects have prepared a Design Statement in support of this development. The Dun Laoghaire Rathdown County Development Plan 2016 – 2022 under Policy UD2: Design Statements, requires such statements for larger developments including residential in excess of 30 units. The submitted design statement sets out the rationale for the layout and type of development having regard to the context of the site.

7.3.5. The proposed development would result in the loss of trees and the demolition of an existing established house; however, I consider that the replacement of this house with 20 apartments in the form of a three storey block is visually acceptable and will not negatively impact on the Foxrock Architectural Conservation Area (ACA). The proposed apartment block will be circa 18 m from the boundary to the north west/ Golf Lane and circa 8 m from the boundary to the west/ Torquay Road. The relatively low height of the block at 10.65 m, the design of the block and the proposed landscaping; all ensure that its visual impact will be acceptable.

7.3.6. Comment has been made in a number of the letters of observation about the breaking of existing building lines by this development. I would have to disagree with

these comments in that I consider that the building line on this section of Torquay Road between Golf Lane and The Birches to the south, is relatively weak in comparison to the building line north of Golf Lane and that to the south of The Birches which are strong and appear to be well established. The set-back nature of Carrigmore actually weakens the perceived building line along this section of Torquay Road. There is no established building line along Golf Lane that is worthy of protection. The position of the proposed apartment block on this site is considered to be acceptable.

7.4. Impact on Residential Amenity

- 7.4.1. The proposed development does not give rise to excessive overlooking of adjoining properties leading to a loss of privacy as more than adequate separation distances are provided. The south east (labelled east on Drawing No. 1815-BLD-0512) elevation is provided with limited windows and which are fitted with metal screens to prevent overlooking. The relevant rooms are dual aspect ensuring adequate sources of natural light to these areas. The window serving Bedroom 3 for apartments no. A1-03, A1-06 and A1-09, will provide for very limited natural light to this room and the applicant may have over compensated in an attempt to prevent overlooking. Overshadowing leading to a loss of daylight of neighbouring properties is not foreseen. The design has been carefully considered in this regard and the set back of the southern corner at second floor level, ensures that sunlight to neighbouring properties is maintained. The extensive tree cover at present would impact on the potential daylight and sunlight penetration to adjoining sites.
- 7.4.2. Room sizes, storage and private amenity space provision, all demonstrate compliance with the *Sustainable Urban Housing: Design Standards for New Apartments - Guidelines for Planning Authorities* (March 2018). Two lift cores are provided serving 6 and 7 units respectively at upper levels and which also allow access from the basement car park to the ground floor. A sufficient number of units, at 80% are dual aspect. Adequate public and communal open space can be provided on site.

7.4.3. The separation distance between windows on the south west elevation of the north west block and the north east facing windows on the north west block is less than the standard 22 m normally required; separation is as short as 12 m in part. The angles of these blocks are sufficient to prevent overlooking and other measures such as screening/ the use of deflected angled windows can further ensure that adequate separation is provided; such measures can be addressed by way of condition.

7.5. Infrastructure and Drainage

7.5.1. The Dun Laoghaire Rathdown Transportation Section have sought further information in regard to a number of aspects of this development. Car parking provision for the development has been proposed at 28 spaces when the County Development Plan requires 32 spaces. The *Sustainable Urban Housing: Design Standards for New Apartments - Guidelines for Planning Authorities* (March 2018) require a reduction in the car parking standard where *'In suburban/ urban locations served by public transport or close to town centres or employment areas and particularly for housing schemes with more than 45 dwellings per hectare net..'* The subject site provides for a density of 54 units per hectare. As noted under the Section 'Site Description and Location' of this report, the site is not well served by public transport and is located within an area with few public transport links and those that exist are at a low frequency. The Luas Green Line and Stillorgan Road QBC are not within easy walking distance of the site for all members of the public.

7.5.2. However, I consider that the current issue of car parking shortfall can be addressed. As proposed every unit will have access to at least one parking space. I also consider it to be possible to provide for adequate bicycle/ motorcycle parking facilities on this site. I would agree that direct pedestrian access should be provided to Torquay Road. A safe and suitably sized vehicular access to the site should be easy to provide. The list of further information sought by the Dun Laoghaire Rathdown Transportation Section is extensive, however, these matters can be addressed by condition in the event that permission is granted.

7.5.3. Irish Water have confirmed that a public water supply to the site is feasible without upgrade to the existing system. Drainage remains the major issue of concern

though. The Dun Laoghaire Rathdown Drainage Planning section have expressed concern about flooding in the area with reference to a 'hotspot' on the junction of Torquay Road and Golf Lane. Poor ground conditions result in insufficient infiltration with ponding occurring. The Drainage Planning Section requested further information in this regard and that a Site-Specific Flood Risk Assessment be prepared. As part of the appeal, and as noted already in this report, the applicants have engaged the services of JBA Consulting to prepare a Flood Risk Assessment. In conclusion this has found that there is risk from pluvial flooding and suitable mitigation measures have been proposed. These measures appear to be sufficient to address the issues of concern and ensure that the development does not give rise to increased flood risk to adjoining sites.

- 7.5.4. The issue of foul drainage has not been adequately addressed. The Dun Laoghaire Rathdown Case Officer identified this matter as the reason for refusal and as such this is the key issue that the applicants must address. Irish Water have, in summary, reported (26th of July 2019) that there are significant network constraints in the foul drainage network, a Drainage Area Plan (DAP) including hydraulic modelling is in progress and which will identify system deficiencies and also will identify what upgrades are required. This DAP will be available in Q4 of 2019 and Irish Water do 'not have any plans to commence upgrade works to its network in this area'. Whilst a connection to the system is feasible, this is subject to the completion of necessary upgrades.

In the absence of certainty regarding the upgrade of the foul drainage network in the area, the proposed development is premature. To permit the development to progress would be prejudicial to public health. The use of a storage tank and pumping in the off-peak, is not a suitable method of foul drainage for a residential development. Permission, therefore, should be refused on this basis.

7.6. **Appropriate Assessment Screening**

- 7.6.1. The applicant has engaged the services of NM Ecology to prepare a Screening for Appropriate Assessment. In summary, the development will not give rise to direct or

indirect impacts to any Natura 2000 sites and Appropriate Assessment is not required.

- 7.6.2. Having regard to the nature and scale of the proposed development and the location of the site in a serviced urban area and the separation distance to the nearest European site, no Appropriate Assessment issues arise, and it is not considered that the development would be likely to give rise to a significant effect individually or in combination with other plans or projects on an European site.

8.0 Recommendation

- 8.1. I recommend that planning permission be refused for the reason and considerations as set out below.

9.0 Reason and Considerations

1. The proposed development would be premature pending the upgrade of the existing Irish Water foul drainage network, which is currently deficient and for which there is no defined timeframe for the commencement of the necessary improvement works. The connection of the proposed development to the current foul drainage system would therefore be prejudicial to public health and would be contrary to the proper planning and sustainable development of the area.

Paul O'Brien
Planning Inspector

9th September 2019