



An  
Bord  
Pleanála

## Inspector's Report ABP-307703-20

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<b>Development</b>	Retention of converted farm store/ barn for on-farm self-accommodation under Objective T15 of the Wicklow County Development Plan.
<b>Location</b>	Ballyross, Glencree, Co. Wicklow
<b>Planning Authority</b>	Wicklow County Council
<b>Planning Authority Reg. Ref.</b>	20/322
<b>Applicant(s)</b>	Daken & Norah Engmann
<b>Type of Application</b>	Permission
<b>Planning Authority Decision</b>	Refuse Permission
<b>Type of Appeal</b>	First Party
<b>Date of Site Inspection</b>	14 <sup>th</sup> October 2020
<b>Inspector</b>	Paul O'Brien

## 1.0 Site Location and Description

- 1.1. The subject site with a stated area of 22 hectares, comprises an area of land located to the north of a local road (L1013-27) in Ballyross, Glencree, Co. Wicklow. The site is in a relatively remote part of Co. Wicklow with Enniskerry located approximately 5.3 km to the north east. This is a mountainous part of Co. Wicklow and the site is significantly lower than the level of the road and the site continues to fall northwards towards the Glencree River. Access to the site is via a driveway that falls rapidly on a south east to north west axis.
- 1.2. There are a number of structures on site including a large single-storey farmhouse, a single-storey residential unit (the subject of this appeal), a large shed to the north west described as a sheep shed and a shed structure to the north of the subject unit which is described as a farm store, a pitched roof structure finished in a mix of corrugated metal panels and Perspex sheeting. In addition to these units, there are open sided/ covered structures, a number of tanks for unknown purposes, shipping type container, a number of animal pens/ fenced areas and quantities of building materials on site. Other than the subject unit, it was unclear from the site visit if the other structures on site were fully complete. The farmhouse for example was missing a number of downpipes and there was evidence of construction activity here. A significant number of vehicles were observed on the day of the site visit including cars, 4X4s, a tractor, a tipper truck and a mini tractor unit.
- 1.3. The section of site between the subject unit and farm store is finished in a concrete slab paving. The access driveway is finished in loose gravel with concrete edging with the sides finished with large boulders. The subject unit has a stated floor area of 146 sq m and from the site visit it was apparent that this was a separate residential unit.

## 2.0 Proposed Development

- 2.1. The development consists of:
  - The retention of a converted farm store/ barn for use as a farm self-catering accommodation unit, in accordance with Objective T15 of the Wicklow County Development Plan. The stated floor area of this structure is 146 sq m.

- Associated effluent treatment system.

## **3.0 Planning Authority Decision**

### **3.1. Decision**

The Planning Authority decided to refuse permission subject to a single reason, which in summary referred to:

The location of the site in a remote rural area, away from services necessary to support a tourist accommodation development in a sustainable manner, located in an area of outstanding natural beauty, where the local road network is of a poor quality, the existing site entrance is substandard in terms of gradient/ sightline distance, the treatment system does not comply with Condition 6 of PRR15/873 and the relatively recent construction of this structure between 2015 and 2016; the proposed development would be contrary to the objectives of the Wicklow County Development Plan in relation to the promotion/ development of tourism and recreation, would adversely impact on the fragile rural landscape, would endanger public safety by reason of traffic hazard and would be prejudicial to public health. The development and the precedent it would set would be contrary to the proper planning and development of the area.

### **3.2. Planning Authority Reports**

#### **3.2.1. Planning Reports**

The Planning report reflects the decision to refuse permission. The Planning Authority Case Officer noted the history of applications on this site and detailed the requirements of the county development plan in relation to tourism/ recreation. Insufficient information was provided to demonstrate that there are tourism/ recreation facilities on/ or within the immediate vicinity of the site. It is accepted that the applicants operate a working farm but no evidence of any tourist related activity currently in operation has been provided in support of the application. The development would be better located in an established settlement. Having regard to the character of the area, it is noted that no visual impact assessment has been provided, the development negatively impacts on the visual amenity of the area and

there are road safety issues. It cannot be demonstrated that the wastewater treatment system would not be prejudicial to public health.

### 3.2.2. Other Technical Reports

**Executive Scientist – Pollution Control:** Further information requested in relation to the capacity of the treatment system, what the loading will be on the system and details on the history of treatment systems on site.

**Bray Engineer Planning Report:** Refers to the poor quality of the public road and the sharp incline of the driveway with an acute angle at the entrance. No objection however, subject to condition that the driveway be raised and suitably sealed.

**Senior Engineer Roads:** Works are required to achieve necessary sightlines and gradient.

**Environmental Health Officer:** Report from EHO requesting further information in relation to the wastewater treatment system.

**Fire Officer:** Need for a Fire Safety Certificate and a Disability Access Certificate.

### 3.3. Objections/ Observations

A single letter of objection was received from A Sammon.

The main issues in summary include:

- In order to comply with Objective T15, there is a requirement to demonstrate that there is a farmhouse in place, with which the proposed development can be associated. At the time of submission of this observation, the house on site which is given as the farmhouse was subject to an appeal for its retention – ABP Ref. 307291-20 refers.
- This structure was relatively recently constructed and is a new build unit, not a converted storehouse. Wicklow County Council were advised of this in 2017.

## 4.0 Planning History

**P.A. Ref. 20/155/ ABP Ref. PL27.307291** refers to an October 2020 decision to grant permission for the retention of a replacement farm dwelling with permission for proposed effluent treatment system and all associated site works.

Condition 3 (b) states:

Within three months of the first occupation of the dwelling, the developer shall submit a report from a suitably qualified person with professional indemnity insurance certifying that the proprietary effluent treatment system has been installed and commissioned in accordance with the approved details and is working in a satisfactory manner in accordance with the standards set out in the EPA document.

Condition 4 states:

The site shall be landscaped, using only indigenous deciduous trees and hedging species, in accordance with details which shall be submitted to, and agreed in writing with, the planning authority within six months of the date of this Order. Any plants which die, are removed or become seriously damaged or diseased, within a period of two years from the completion of the development, shall be replaced within the next planting season with others of similar size and species, unless otherwise agreed in writing with the planning authority.

**P.A. Ref. 15/873** refers to a December 2015 decision to grant permission for modifications and extensions to existing dwelling, approved under P.A. Ref. 14/1693.

**P.A. Ref. 14/1693** refers to a November 2014 decision to grant permission for construction of alterations and extension (290 sq m) to existing dwelling (101 sq m), demolition of existing outside and new wastewater treatment system.

## 5.0 Policy and Context

### 5.1. Development Plan

- 5.1.1. Under the **Wicklow County Development Plan 2016 – 2022**, the site is within a Level 10 – Rural Area.
- 5.1.2. Within Chapter 2 – Vision and Core Strategy, an assessment of the rural areas found that there is no evidence of significant population decline in any part of the County and pressure for rural housing around the fringes of major towns is evident.
- 5.1.3. Chapter 7 refers to Tourism and Recreation and the following are relevant to this development:

T1 To promote, encourage and facilitate the development of the tourism and recreation sectors in a sustainable manner.

T2 To ensure that all tourism and recreation developments are designed to the highest quality and standards.

T3 To generally require tourism and recreation related developments to locate within existing towns and villages, except where the nature of the activity proposed renders this unfeasible or undesirable. Within existing towns and villages, the Planning Authority will promote and facilitate the development of tourist related uses at appropriate sites. In all cases, the applicant must submit a robust assessment setting out the sustainability of any proposal with respect to economic, environmental and social sustainability, as defined herein.

T4 To only permit the development of a tourism or recreational facility in a rural area in cases where the product or activity is dependent on its location in a rural situation and where it can be demonstrated that the proposed development does not adversely affect the character, environmental quality and amenity of the rural area or the vitality of any settlement and the provision of infrastructure therein. The natural resource / tourist product / tourist attraction that is essential to the activity shall be located at the site or in close proximity to the site, of the proposed development. The need to locate in a particular area must be balanced against the environmental impact of the development and benefits to the local community.

T6 To ensure that tourism and recreation related developments are appropriately located in the County. Subject to the following exceptions, all tourist and recreation related developments are 'open for consideration'<sup>1</sup> in all landscape areas:

- The following tourist uses will not be permitted within the Area of Outstanding Natural Beauty

(both the Mountain Uplands Area and the Coastal Area): Static caravans and mobile homes <sup>2</sup>;

- Holiday homes will not be permitted in any landscape category other than urban zones except where they comply with objectives T13, T14 and T15

<sup>1</sup> Uses that are 'open for consideration' are uses that will only be permitted in cases where the Planning Authority is satisfied that the use would not conflict with the general objectives for that landscape area and permitted or existing uses, as well as being consistent with the proper planning and sustainable development of the area and the strategies / objectives of this plan.

<sup>2</sup> This refers to the development of any **new** static caravan and mobile home parks; expansion of existing facilities will be considered subject the suitability of the site, a modest scale and high quality design.

T7 To favourably consider proposals for tourism and recreation related development, which involve the reinstatement, conservation and/or replacement of existing disused buildings and to adopt a positive interpretation to plan policies to encourage such developments. This shall be subject to all other objectives being complied with, and subject to the proper planning and sustainable development of the area. In all areas, preference will be given to the conversion and adaptation of existing buildings rather than the provision of new development on greenfield sites.

T10 To facilitate the development of a variety of quality accommodation types, at various locations, throughout the County.

T13 To require new holiday home / self-catering developments to locate within either established settlements or at established tourism / recreation facilities, other than those developments involving the renovation / conversion of existing buildings.

T14 To require the developers / owners of new holiday homes / self catering developments to enter strict legal agreement (under Section 47 of the Planning & Development Act) with the Planning Authority specifying that:

- the units may only be used for tourism purposes and shall not be allowed to be used as a permanent residences;
- in the case of small-scale developments<sup>6</sup>, the entire development, including all buildings, land and any on-site tourist facility, shall be held in single ownership and shall not be subdivided.

All units shall be available for short term letting only of a maximum duration of 4 weeks; and

- in the case of larger scale developments <sup>7</sup>
- all lands, including any on-site tourist facility shall be held under the management of a single Estate Company (including all lands included in the site boundary and land which adjoins, abuts or is adjacent to the land to be developed and which is under the control of the applicant or the person who owns the land which is the subject of the application) and
- in the event that any unit is sold or leased, the owner/lessee shall enter a legal agreement with the Estate Company stipulating that the purchaser, lessee and any successors in title be, and remain, members of the Estate Company, and stipulating that the unit may only be used by the owner/lessee for holiday use for a maximum of 3 months in any year and shall at all other times be used/leased/marketed by the Estate Company for short term (maximum 4 weeks) tourism use.

T15 Holiday home / self-catering developments on a farm holding shall be provided by farmhouse extension or by the utilisation of other existing dwellings / structures on the property. Only where it has been demonstrated that these are not viable options, will permission be considered for new build development. Any new build development shall be in close proximity to the existing farmhouse.

- 5.1.4. The Wicklow Landscape Category Map – Appendix 5 – indicates that the site is located within a Mountain and Lakeshore – Area of Outstanding Natural Beauty.



The site is located within an area with a High Sensitivity. The site is located within the Wicklow Mountain's area and the following is noted:

'The North Eastern Valley/Glencree

This area is situated along the northern extremities of the County and is based around the drainage pattern of the Glencree and Dargle Rivers and the surrounding road network. This area is very scenic, with attractive views and number of tourist attractions such as Powerscourt House and Demesne, Charleville Demesne and Glencree Drive. This landscape provides for extensive forested areas made up of both coniferous and deciduous woodlands'.

- Section 5.3.1 General Development Considerations (GDC) requires a Visual Impact Assessment (VIA) for such areas.

5.1.5. 'Appendix 2 – Design Guidelines for New Homes in Rural Wicklow' is noted and provides extensive guidance on the location, layout and design of houses in rural locations.

5.1.6. Objective WI7 of Chapter 9 – Infrastructure, is noted and states:

*Permission will be considered for private wastewater treatment plants for single rural houses where:*

- *the specific ground conditions have been shown to be suitable for the construction of a treatment plant and any associated percolation area;*
- *the system will not give rise to unacceptable adverse impacts on ground waters / aquifers and the type of treatment proposed has been drawn up in accordance with the appropriate groundwater protection response set out in the Wicklow Groundwater Protection Scheme (2003);*
- *the proposed method of treatment and disposal complies with Wicklow County Council's Policy for Wastewater Treatment & Disposal Systems for Single Houses (PE ≤ 10) and the Environmental Protection Agency "Waste Water Treatment Manuals"; and*
- *in all cases the protection of ground and surface water quality shall remain the overriding priority and proposals must definitively demonstrate that the*

*proposed development will not have an adverse impact on water quality standards and requirements set out in EU and national legislation and guidance documents.*

5.1.7. Chapter 10 refers to Heritage and the following Landscape Objective is relevant:

‘NH50 Any application for permission in the AONB which may have the potential to significantly adversely impact the landscape area shall be accompanied by a Landscape / Visual Impact Assessment, which shall include, inter alia, an evaluation of visibility and prominence of the proposed development in its immediate environs and in the wider landscape, a series of photos or photomontages of the site / development from clearly identified vantage points, an evaluation of impacts on any listed views / prospects and an assessment of vegetation / land cover type in the area (with particular regard to commercial forestry plantations which may be felled thus altering character / visibility). The Assessment shall demonstrate that landscape impacts have been anticipated and avoided to a level consistent with the sensitivity of the landscape and the nature of the designation’.

Schedule 10.15 refers to ‘Prospects of Special Amenity Value or Special Interest’ and include the L1011, L1015 & L5014 Glenree referring to ‘Prospect of mountain area around Glenree Drive, Prince William Seat, Glenree River and Sugarloaf Mountain’.

## 5.2. National Guidance

5.2.1. ***The Sustainable Rural Housing – Guidelines for Planning Authorities*** (April 2005) is relevant to this proposal as they set out the need for rural housing in appropriate/ sustainable locations.

5.2.2. **National Planning Framework – Project Ireland 2040** recognises the importance of rural Ireland.

## 5.3. Natural Heritage Designations

The subject site is not located within any Natural Heritage designated lands.

The Wicklow Mountains SPA (Site Code 004040) is located circa 0.5 km to the south of the site and the Wicklow Mountains SAC (Site Code 002122) is located circa 1 km to the south.

## **6.0 The Appeal**

### **6.1. Grounds of Appeal**

The applicant has appealed the decision of Wicklow County Council to refuse permission for this development.

The following issues are raised in summary in the appeal:

- The farm has been operating since the 1790s and was purchased in 2013 by the applicants. A significant amount of work has been undertaken to restore the farm. Dexter cattle, a rare breed and sheep form part of the farm. Members of the public visit the farm and social media is used to inform the public as to what is happening on site.
- On-farm accommodation is proposed to enable visitors to stay on the farm and to be educated as to how a farm operates.
- The planning history of the site is provided.
- A farm store was replaced with a newer structure and which in turn became the unit subject to this appeal. As a store it would be exempt under the Planning and Development Regulations 2001 as amended under Class 9 – Exempted Development – Rural.
- The farm store was converted to habitable use as the applicants had a need for residential accommodation on their farm, whilst waiting for planning permission/ the construction of their permanent home on site.
- A query referred to the Planning Authority was considered as pre-planning consultation by the Planning Authority. The applicants consider that the Planning Authority developed an opinion on this development before it was formally lodged.

- The proposed unit will allow for accommodation for one family at a time; there is no proposal for a farm shop or to operate the farm as an 'open farm' with relatively unrestricted access on a fee per visitor basis.
- The Planning Authority have incorrectly interpreted Objectives T13 and T15 of the Wicklow County Development Plan.
- It is not feasible to extend the existing house any further, for use as tourist accommodation.
- The Planning Authority decision is considered in detail; farms are not located in urban areas, the building is located within a cluster of structures, the area is not pristine located within a cleared area amongst Sitka Spruce trees, the traffic issues can be resolved and details of the treatment system have been forwarded to the Planning Authority, included with this appeal. The issue of the date of construction as referred to in the Planning Authority Case Officer's report seems irrelevant.
- In conclusion the appellants reiterate their belief that the Planning Authority had made a decision on this application before it was submitted. They have disregarded protections under Articles 40.1 and 40.3 of the Irish Constitution – Fundamental rights of the person.

A significant amount of supporting documentation, reports and photographs have been included with the appeal.

## 6.2. **Planning Authority Comment**

None.

## 7.0 **Assessment**

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

- Principle of the Development/ Unauthorised Development
- Design and Impact on the Character of the Area
- Infrastructure Considerations
- Other Issues

- Appropriate Assessment Screening

## 7.2. Principle of the Development/ Unauthorised Development

- 7.2.1. I have had full regard to the planning history of this site and the documentation submitted in support of the application. There is no question, that the subject unit was built without permission, the applicants/ appellants have outlined the history and the reasons for the construction of this unit without receiving planning permission. Consideration of retention applications should be on the basis that they are a proposed development, however there is a benefit in such applications in that the visual/ general impact is clearly apparent.
- 7.2.2. I do not intend going into significant detail in relation to unauthorised development and the issue of enforcement, which is a matter for the Planning Authority, but I will make some very general comments at this point. Since buying this site in October 2013, the applicants/ appellants have had a history of lodging planning applications and have also constructed units contrary to planning permission. The subject unit was originally built as a farm store, was used for lambing during that season and subsequently was converted into habitable use. Such structures cannot be used for habitable purposes under Class 9 of Exempted Development – Rural, of the Planning and Development Regulations 2001 as amended.
- 7.2.3. The subject structure does not have the benefit of planning permission for habitable use including for tourism use. The Wicklow County Development Plan 2016 – 2022 seeks to locate tourism accommodation in established urban areas – Objective T3 states ‘To generally require tourism and recreation related developments to locate within existing towns and villages, except where the nature of the activity proposed renders this unfeasible or undesirable’. I accept that the site is remote from existing urban areas, however I am not satisfied that the ‘nature of the activity proposed renders this unfeasible or undesirable’. No business/ tourism plan has been provided which would clearly outline the nature of the activity. I accept that there is a working farm here, but I would expect a lot more detail as to how the tourism aspect is derived from the existing activities on site. The provision of accommodation is not sufficient, the subject development would be more akin to providing a holiday home in such an area.

- 7.2.4. In relation to Objective T13 which seeks 'To require new holiday home / self-catering developments to locate within either established settlements or at established tourism / recreation facilities, other than those developments involving the renovation / conversion of existing buildings'. There is no evidence of there being an established tourism offering here, so that can be dismissed as justification for this development.
- 7.2.5. The renovation/ conversion of existing buildings is open for consideration, but I would caution the meaning of this. From the site visit, it appeared that the structure on site was a new build residential unit. Whilst it may have had some use for agricultural purposes, this was clearly only for a temporary period of time. From the submitted appeal statement, it appears that work was underway on this structure in late 2015, a roof was provided in February 2016, it was used for lambing in March 2016 and the family moved into the unit in June 2016. The unit was provided with electricity, water and was insulated after the family moved in. Going back to the dates provided by the appellants, construction was clearly still underway in February 2016 and they moved in, in June of that year. This is a very short period of time and I would consider that this was always a residential unit that was temporarily used for farming purposes. The development does not comply with Objective T13.
- 7.2.6. I do not consider that the appellants have adequately demonstrated compliance with Objective T15 either. It is stated that it is not possible to use the family home for tourism purposes and that it was decided to convert this farm building. I accept why the family home is not used, but I do not accept the reasoning for this structure, which as I have already reported, was not a farm building.
- 7.2.7. I therefore consider that insufficient information and justification has been provided for the retention of this unit for tourism purposes as the development does not demonstrate compliance with the requirements of the Wicklow County Development Plan 2016 – 2022.

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

- 7.3.1. The site is located in an Area of Outstanding Natural Beauty (AONB) and whilst the development is clustered with other buildings, I would have concern that the development has eroded part of the character of this area. I accept that the appellants have invested much time/ money into the upgrading of this farm but that

does not justify the erosion of this area. The appellants comment on the fact that the area is not 'pristine' as stated in the Planning Authority Case Officer's report and reason for refusal. The fact is that the site is located within an AONB and where prospects are to be protected and the construction of unnecessary additional units would erode the character of the area.

- 7.3.2. From the site visit, it was apparent that the site was somewhat cluttered, with two residential units and a number of sheds/ stores, of different sizes. Whilst landscaping of the site has not commenced, I would caution if such works would sufficiently improve the site and the impact on the area.
- 7.3.3. The unit itself, is set into the hillside with no rear amenity area and it would not be possible to provide for such if it were to be operated as a separate dwelling house, which I accept it is not being applied for. The unit at 146 sq m floor area is not a small structure.
- 7.3.4. Overall, I would have concern that the development has eroded the character of the area through providing for an additional unit adjacent to a residential unit and for which no justifiable need has been provided. No attempt has been made to demonstrate compliance with Objective NH50 as no visual impact assessment has been undertaken/ submitted.

#### **7.4. Infrastructure Considerations**

- 7.4.1. Part of the reason for refusal issued by the Planning Authority referred to the development being prejudicial to public health. Additional details have been provided in support of the appeal including a letter from Ian Heffernan & Associates (Engineers) certifying the correct installation of the treatment system. I will accept the submitted details and rely on the engineer's certification in this regard.
- 7.4.2. Concern about traffic safety was also listed in the reason for refusal, primarily due to the deficient public road and site access arrangements. The road network in the area consists primarily of local roads and which may just be about sufficient for the needs of local people accessing their lands/property and homes. These roads would have a long history and are defined by the topography of the area. I note the reports of the Area Engineer (Bray) and the Roads Department. The Area Engineer has commented on the quality of the local road network. I would have concern about the introduction of additional traffic on these roads that a tourism related activity would

generate. Such development would in time require the upgrading of the local road network to ensure that public safety can be protected.

- 7.4.3. The access to the site was also raised as an issue by the Area Engineer and the Roads Department. Whilst the existing arrangements are acceptable for the applicants, additional traffic generated by tourism would require a different standard of access as the car drivers would not be as familiar with the local road network, the incline to and from the site and the sightlines at the entrance to the site. The improvement of the driveway surface would require additional surface water drainage provision and any alterations to the entrance may impact on the character of the area, again eroding the rural character to an unacceptable level.
- 7.4.4. In conclusion of this issue, I would agree with the Planning Authority that the road network is deficient for any increase in traffic volumes especially for road users who may not be aware of the condition of the local road network. A similar concern arises in relation to the site access/ driveway arrangements, whilst these may be acceptable for the family who are regular users of this access/ driveway, visitors may not have the same level of awareness, increasing the potential for traffic safety issues.

## **7.5. Other Issues**

- 7.5.1. The appellants refer to 'The Council having disregarded protections under articles 40.1 and 40.3 of the Irish Constitution' – these articles refer to protection/ fundamental rights of the person. It is not the function of the Board to address issues relating to Enforcement, however, the fact remains, that the appellants constructed units without permission, lived in the subject unit which had no permission for such use and subsequently sought the retention of unauthorised structures. From the site visit and available information, their home is complete and suitable for habitable use. Due to the passage of time etc. the appellants have been able to live on site since 2016 and can now occupy their permanent home. Whilst proceedings may have been on-going, I do not accept that their rights were infringed. The Planning system is relatively clear in terms of what is required to obtain planning permission. I note that they have engaged the services of a number of engineers



and architects over time, so they would have been made aware of how the process progresses in stages.

## **7.6. Appropriate Assessment Screening**

- 7.6.1. Having regard to the nature and scale of the proposed development and the location of the site 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 following reasons and considerations as set out below.

## **9.0 Reasons and Considerations**

- 9.1. The site is located in an area which is designated in the current Wicklow County Development Plan 2016 - 2022 as an 'Area of Outstanding Natural Beauty' and which is given a high sensitivity rating. It is a policy of the planning authority to control development in order to maintain the scenic values, recreational utility and existing character of the area. This designation and policy are considered reasonable. No Visual Impact Assessment has been provided as required under Objective NH50. The development would detract to an undue degree from the rural character and scenic amenities of the area. It is considered, therefore, that the retention of this development would contravene this policy and be contrary to the proper planning and sustainable development of the area.
- 9.2. The unit proposed for retention is intended to be for tourism use associated with the existing active farm. The applicants have failed to demonstrate compliance with the Wicklow County Development 2016 – 2022 in terms of meeting the requirements of Objectives T3, T13 and T15. The site is located in a remote rural location, the unit cannot be clearly classified as a former agricultural building as the period of agricultural use was for a very short period of perhaps only two months and insufficient evidence has been provided to demonstrate that there is a tourism use

currently in use on this site. It is considered, therefore, that the retention of this development would contravene these objectives and be contrary to the proper planning and sustainable development of the area.

- 9.3. The intensification of use of this site from farm/ residential unit to include a tourism offering, with insufficient detail supplied in terms of visitor numbers etc. would result in increased car traffic as no public transport is available in the immediate area and no public footpaths are available. The existing site entrance is deficient in terms of sightlines and the driveway access is steeply inclined with a poor top surface. The site is located on a minor road which is seriously substandard in terms of width and alignment. The traffic generated by the proposed development would endanger public safety by reason of traffic hazard and obstruction of road users.

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Paul O'Brien  
Planning Inspector

26<sup>th</sup> November 2020