

# Inspector's Report ABP-307794-20

**Development** Construction of a two storey house,

domestic garage, wastewater treatment system, vehicular entrance

and all associated site works

**Location** Ballybrittan, Rhode, Co. Offaly

Planning Authority Offaly County Council

Planning Authority Reg. Ref. 20/106

**Applicants** Therese Hickey & Darren Molloy

Type of Application Permission

Planning Authority Decision Grant Permission

Type of Appeal Third Party v Grant of Permission

**Appellant** Mrs. Rosemarie Manning

Observer(s) None

Date of Site Inspection 08.10.2020

**Inspector** Anthony Kelly

# 1.0 Site Location and Description

- 1.1. The site is on a local road approx. 4km south east of Rhode and approx. 4km west of Edenderry in north east Co. Offaly.
- 1.2. The site is an agricultural field. There is a hedgerow along the roadside boundary to the front/east. There is a hedgerow to the front section of the northern/side boundary, but this side boundary mainly comprises a post and wire fence and there is also a post and wire fence along the rear/west boundary. There is a slight increase in ground levels toward the rear. There are a number of one-off houses in the area. There is an agricultural shed and farmyard at the adjoining property to the north west. There is a bend in the local road to the north of the site while the road is relatively straight to the south.
- 1.3. The site has an area of 0.43 hectares.

# 2.0 **Proposed Development**

- 2.1. Permission is sought for a two storey house, garage, wastewater treatment system and vehicular entrance.
- 2.2. The proposed house is to be externally finished in render, stone, zinc and slate with a natural slate roof. It has a floor area of 231sqm and a maximum height of 8.037 metres.

# 3.0 Planning Authority Decision

## 3.1. **Decision**

Permission was granted subject to 13 no. conditions including a seven year occupancy condition, external finishes, surface water disposal, the removal of the roadside boundary to achieve sightlines, wastewater treatment, Irish Water connection, landscaping and development contributions.

## 3.2. Planning Authority Reports

3.2.1. The Planning Report forms the basis of the planning authority decision. The report considers that, having regard to the rural nature of the site, the intended use of the development, the County Development Plan, the Sustainable Rural Housing Guidelines, the third party submission, referral reports on file and the pattern of existing development in the area, subject to conditions, the proposed development would not seriously injure the amenities of the area or property in the vicinity and will be in accordance with the proper planning and sustainable development of the area.

## 3.2.2. Other Technical Reports

**Edenderry Area Office** – Recommends conditions to be applied should permission be granted.

**Environment & Water Services** – No objection subject to conditions.

#### 3.3. Prescribed Bodies

**Irish Water** – No objection. Observations made.

## 3.4. Third Party Observations

3.4.1. One submission was received from Rosemarie Manning. The issues raised are generally similar to those referenced in the grounds of appeal.

# 4.0 Planning History

4.1.1. There has been one previous valid planning application on site for different applicants.

This is:

P.A. Reg. Ref. 14/75 / ABP Reg. Ref. PL 19.243891 – Permission was refused in 2015 on foot of a third party appeal of the decision by the planning authority to grant permission for a one and half storey house, garage and wastewater treatment unit for the following reason:

It is considered that by reason of the design and scale of the proposed house, including fenestration and chimney treatment, the proposed house would be

visually obtrusive and together with the proposed garage, driveway and boundary revisions would detract from this open rural area where nearby housing is generally single storey. The proposed development would, therefore, seriously injure the amenities of property in the vicinity and be contrary to the proper planning and sustainable development of the area.

# 5.0 Policy Context

## 5.1. Project Ireland 2040 National Planning Framework (NPF)

5.1.1. National Policy Objective (NPO) 19 states it is an objective to ensure, in providing for the development of rural housing, that a distinction is made between areas under urban influence, i.e. within the commuter catchment of cities and large towns and centres of employment, and elsewhere. In rural areas under urban influence, facilitate the provision of single housing in the countryside based on the core consideration of demonstrable economic or social need to live in a rural area and siting and design criteria for rural housing in statutory guidelines and plans, having regard to the viability of smaller towns and rural settlements.

## 5.2. Eastern & Midlands Regional Spatial & Economic Strategy 2019-2031 (RSES)

- 5.2.1. Section 4.2 (Settlement Strategy) Support the sustainable growth of rural areas by promoting the revitalisation of rural towns and villages, including ready to go regeneration projects coupled with investment where required in local employment and services and targeted rural housing policies, to be determined by local authorities.
- 5.2.2. Section 4.8 (Rural Places: Towns, Villages and the Countryside) states, inter alia in relation to housing, that support for housing and population growth within rural towns and villages will help to act as a viable alternative to rural one-off housing, contributing to the principle of compact growth.
- 5.2.3. Regional Policy Objectives (RPOs) for Rural Areas include RPO 4.77 and RPO 4.78 which, generally, support local authority development plans prioritising the regeneration of rural towns, villages and rural settlements. Policy RPO 4.80 reiterates NPO 19 where it states that, in Rural Areas Under Strong Urban Influence and

Stronger Rural Areas, local authorities shall manage urban generated growth by ensuring that in these areas the provision of single houses in the open countryside is based on the core consideration of demonstrable economic or social need to live in a rural area, having regard to the viability of smaller towns and rural settlements.

## 5.3. Sustainable Rural Housing Guidelines for Planning Authorities (2005)

5.3.1. These guidelines are relevant to the planning application. Circular Letter SP 5/08 was issued after the publication of the guidelines.

## 5.4. Offaly County Development Plan 2014-2020

- 5.4.1. Section 1.15.6 (Approach to Future Population Growth Housing in the Open Countryside) states the settlement strategy recognises the tradition of rural living and the requirements of people connected with the rural area and/or with an identified need to reside in the open countryside. Housing policy in the open countryside is informed by the Sustainable Rural Housing Guidelines (2005) which provides that planning authorities distinguish between areas under strong urban influence, stronger rural areas and structurally weaker areas. The rural housing policy is specifically aimed at restricting what the guidelines refer to as 'urban generated housing' whilst prescribing that 'rural generated housing' which will be facilitated by way of policy. On Map 1.3 (Rural Area Types in County Offaly) the site is located in an area of 'strong urban influence'. On Map 1.4 (Rural Housing Policy Map) the site is in a 'pressure area'.
- 5.4.2. The rural housing policy is set out under Policy SSP-18. Within areas of the open countryside identified as a pressure area a positive presumption will be given towards a new single house for the permanent occupation of an applicant who falls within one of three separate categories set out. These categories are local rural persons, persons working fulltime or part time in rural areas or exceptional health circumstances.
- 5.4.3. Section 8.7 (Development Management Standards Single Houses in the Countryside) is also relevant.

## 5.5. Draft Offaly County Development Plan 2021-2027

5.5.1. Figure 2.1 (Rural Area Types) identifies the site as being in a 'Rural Area Under Strong Urban Influence'. The site is in the 'Core' Region which includes Electoral Divisions

- where at least 15% of the workforce are working in the Dublin Metropolitan Area. The Core Region has an aim to, inter alia, provide for increased employment and improved local economies, services and functions to allow towns to become more self-sustaining.
- 5.5.2. Section 2.4.7 (Rural) states rural population will continue to be supported through the villages and Sráids and through a sustainable approach to maintaining the rural population and economy, balanced against responsible environmental protection. Support for housing and repopulation, as necessary, taking place within towns and villages will help to act as a viable alternative to one-off housing and will contribute to the principle of compact growth. This section notes that, in accordance with the RSES, it will be necessary to demonstrate a functional economic or social requirement for housing need in Rural Areas Under Strong Urban Influence.
- 5.5.3. Policy SSP-21 outlines the circumstances where it is Council policy to consider a dwelling for the permanent occupation of an applicant in a Rural Area Under Strong Urban Influence

# 5.6. Natural Heritage Designations

5.6.1. The closest Natura 2000 site is The Long Derries, Edenderry SAC approx. 8.7km to the south east. The closest heritage area is Grand Canal pNHA approx. 400 metres to the south.

# 5.7. EIA Screening

5.7.1. Having regard to the nature and scale of the proposed development and the 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 stage, and a screening determination is not required.

# 6.0 The Appeal

## 6.1. **Grounds of Appeal**

- 6.1.1. The grounds of appeal are submitted by Mrs. Rosemarie Manning, Ballybrittan, Co. Offaly. The main points made can be summarised as follows:
  - The proposed house would be the fifth in the 500 metres stretch on the side of the road. That the development constitutes ribbon development, was disregarded in the planning authority Planning Report because it was not cited in the Board's decision for ABP Reg. Ref. PL 19.243891. However, it was referenced in the Inspector's Report. The development would lead to a proliferation of houses in a rural area under development pressure and identified as under Strong Urban Influence in the Rural Housing Guidelines and would be contrary to the Guidelines. If permitted, the development would exacerbate the concentration of one-off houses in this rural area under Strong Urban Influence.
  - The planning authority Planning Report addresses matters regarding finishing materials of the proposed house and not the scale. The Board decision under ABP Reg. Ref. PL 19.243891 stated that the design and scale of the house would be visually obtrusive and would detract from this open rural area where nearby housing is generally single storey. The proposed elevation height is similar to the earlier proposal. The proposed two storey house has a suburban character and footprint. The proposed house would be out of character with the established, primarily single storey in scale, rural house type and would represent a visually inappropriate feature in the rural landscape. The garage is at a distance from the house. It is a guideline to locate garages to provide sheltered external spaces, as with traditional rural houses, rather than in isolation.
  - The planning authority decision is inconsistent. The Area Engineer indicates no objection; however, it is evident there are inadequate sightlines. Condition No. 6 requires significant amendments to the scheme to render it safe involving the removal of the entire front boundary and setting the new boundary back by four metres. This will have a very significant impact on the rural amenity of the

narrow country road. This practice has had a detrimental impact on rural amenity in many counties. The proposal as submitted would result in a traffic hazard and it requires the removal of the roadside boundary to address it. There is no evidence an alternative site has been considered as required by the Rural Housing Guidelines to avoid the necessity for roadside boundary removal.

## 6.2. Applicants' Response

## 6.2.1. The main points made can be summarised as follows:

- In relation to the previous application on site, opinions expressed in Board decisions are given in the context of that specific application and not for the current proposal. Reasons for refused applications are generators for developing and honing a successful proposal.
- The development does not constitute ribbon development as defined in the Rural Housing Guidelines or proliferation of houses in a rural setting.
- The applicant meets the criteria in Policy SSP-18 of the County Development Plan 2014-2020 i.e. the rural housing policy.
- There are adequate sightlines exiting the proposed development. The width of
  the existing road is consistent with the rural road network. Traffic generated by
  one, two-car house has no impact on the traffic system. The Area Engineer
  stated he had no objection.
- No objection was raised in relation to wastewater, surface water or water.
- The site layout, location, scale and form, material finishes, boundary treatment, landscaping and energy efficiency demonstrates high standard and complies with Policy SSP-17 which encourages and promotes quality and appropriate design standards.
- A condition was attached in relation to boundary planting to protect the character of the rural area.
- The development has no potential for significant effects on any European site.
- The grounds of appeal exaggerate concerns without merit made in relation to an old application. The issues have been addressed. All applications in the area

are assessed against Policy SSP-18 so there are no dire implications for the proliferation of houses in the immediate area.

- If the local residents, elected officials and the Local Authority that are directly or indirectly affected, are in support, the Board is asked on what grounds is the appeal? The appellant has no technical, legal, moral or social grounds and the case should be thrown out. A number of submitted documents state the appellant does appear to be normally resident in the area and is unknown in the local community.
- The applicants' response to the grounds of appeal also includes a letter from the applicants outlining the background to the application, signatures from 64 no. local residents supporting the application, a letter of support from a retired principal of Scoil Phádraig, Ballybryan, Rhode (1.6km north west of the site), a letter of support from the current principal of the school which sets out the threat of closure from a dwindling school population as a result of new families not being granted permission for houses in the community and letters of support from two local County Councillors.

# 6.3. Planning Authority Response

6.3.1. The planning authority respectfully requests the Board upholds the decision.

#### 6.4. Observations

6.4.1. None.

## 6.5. Further Responses

6.5.1. None.

## 7.0 Assessment

Having examined the application details and all other documentation on file, including all of the submissions received in relation to the appeal, and inspected the site, and having regard to relevant local/regional/national policies and guidance, I consider that the main issues in this appeal are as follows:

- Compliance with the Rural Housing Policy New Issue
- Site Location
- House Design and Site Layout
- Traffic/Vehicular Entrance
- Wastewater Treatment
- Appropriate Assessment

# 7.1. Compliance with the Rural Housing Policy – New Issue

- 7.1.1. A core issue with every application for a one-off house is an applicant's compliance with the rural housing policy. The planning authority considered that the applicant Therese Hickey (who is referred to as 'the applicant' in this subsection) complies with the policy as no documentation was submitted relating to Darren Molloy. The planning authority's rural housing policy is set out under Policy SSP-18 of the County Development Plan 2014-2020.
- 7.1.2. The section of the planning authority's Planning Report which considers the applicant's compliance with the rural housing policy is brief. The report considered the applicant meets Category 1 (Local Rural Persons) i.e. a person who was born within the local rural area or who is living or has lived in the local rural area (defined as the area generally within an 8km radius of where the applicant was born or is living) for a minimum of five years and who does not nor has ever owned a house in a rural area. The supporting documentation with the application includes a letter of support from the local parish priest, a letter from a secondary school in Rochfortbridge where the applicant attended school and now teaches, and a map showing the location of the family home approx. 5.5km to the west where it is stated the applicant currently lives, and residences of other family members.
- 7.1.3. While the applicant may satisfy the rural housing policy as set out in the County Development Plan 2014-2020, I do not consider that current national or regional policy in relation to rural housing has been met. The NPF and the RSES require that, in rural

areas under urban influence or rural areas under strong urban influence, single housing in the countryside shall be provided based on the core consideration of demonstrable economic or social need to live in a rural area. The proposed site is located in one of these areas as evidenced by its location in an area of 'strong urban influence' (Map 1.3 – Rural Area Types in County Offaly) and in a 'pressure area' (Map 1.4 – Rural Housing Policy Map) of the County Development Plan 2104-2022. The applicant has not demonstrated any economic or social need to live in this rural area. The applicant is a secondary school teacher in Rochfortbridge. The only detail in relation to demonstrating a need to live in the rural area is that the applicant grew up and lives in a rural area.

7.1.4. Having regard to the foregoing, I consider that no demonstrable economic or social need to live in the rural area has been set out. To permit the development would therefore contravene national and regional policy in relation to rural housing and would have a detrimental impact on the viability of smaller towns, villages and rural settlements and I consider permission should be refused on this basis. As the planning authority considered the applicant complied with the rural housing policy and as it was not raised in the grounds of appeal, I consider that this is a new issue. I would draw the Board's attention to this fact and, as such, the Board may wish to seek the views of the parties.

### 7.2. Site Location

- 7.2.1. The grounds of appeal consider the proposed development would comprise ribbon development, would lead to a proliferation of houses in a rural area under development pressure and would exacerbate the concentration of one off houses in the area.
- 7.2.2. There are a number of one off houses in the vicinity of the site, including five houses in a row on the opposite side of the road from the site and houses both north and south on the same side of the road. The Inspector's Report for PL 19.243891 states that ribbon development is clearly evident on the opposite side of the road and the proposed house would contribute to piecemeal development in an area of open countryside. In his recommendation to refuse permission, the Inspector stated that the development would constitute random haphazard development within an area

- identified as a 'Pressure Area'. However, this was excluded from the reason for refusal.
- 7.2.3. Policy SSP-17 of the County Development Plan 2014-2020 states, inter alia, that it is Council policy to ensure that normal siting considerations are complied with including the capacity of the area to absorb further development such as the extent of existing ribbon development in the area, the degree of existing haphazard or piecemeal development in the area and the degree of development on a single original landholding. While ribbon development is not defined in the County Development Plan 2014-2020 in terms of a specific number of buildings over a specific distance it states that a restrictive approach will be taken towards rural housing that contributes to or exacerbates ribbon development. Ribbon development exists on the opposite side of the road and, while it does not exist to the same concentrated degree on the same side of the road as the site, there are a number of houses within relatively close proximity to both north and south. A house at this location, which I consider unrelated to an appropriate rural housing need, would further contribute to the erosion of the rural character of the area, amplify and exacerbate the extent of existing one-off housing in this rural area and contribute to the creation of 'infill' sites. The extent of development on the original landholding is unclear. Item 5 of the planning authority's Supplementary Application Form No. 1 (Rural Housing in Open Countryside) requires submission of a site location map outlining the extent of the landholding from which the site belongs. No such map appears to have been submitted.
- 7.2.4. Having regard to the location of the site in an area under strong urban influence and development pressure, the extent of existing development in the vicinity of the site and the absence of an appropriate need for a one-off house at this location I consider the development would comprise piecemeal, haphazard development in an unserviced rural area already subject of ribbon development and would further contribute to a proliferation of houses in the rural area. I recommend permission be refused on this basis.

# 7.3. House Design and Site Layout

7.3.1. The grounds of appeal consider that the proposed house would be out of character with the established rural house type in the vicinity and would represent a visually

- inappropriate feature in the rural landscape because of the house's suburban character and footprint.
- 7.3.2. Permission was refused under P.A. Reg. Ref. 14/75 / ABP Reg. Ref. PL 19.243891 because of the house type. That house had a floor area of 270sqm and a height of 8 metres. The site area was larger than that of the current application, at 0.68 hectares. The current house has a floor area of 231sqm and a similar height. The previous application had a building line of 48 metres whereas the current proposed building line is 26 metres. The proposed house has a different design to that previously refused. The previous house had a front elevation width of 19.62 metres with several different roof profiles and gable features to the front elevation, a bay window and a single storey area to the side. Fenestration and chimney treatment were specifically referenced in the reason for refusal. The proposed house type has a narrower front elevation at 13.3 metres wide, but a deeper footprint. The house has a contemporary design, and the front elevation has windows with vertical emphasis, no angled profiles and it is a less complex elevation. While the existing houses in the vicinity are single storey in scale, I do not consider that this should necessarily dictate than any new intervention in the landscape must also be single storey in scale. The site is relatively large, and I do not consider that the proposed 1 ½ storey house would have an undue adverse impact on the receiving environment in terms of the house design. However, opaque windows should be provided to the wardrobe and en-suite rooms at first floor level to the north side elevation and the second bedroom window at first floor level on the south side elevation should be omitted given the separation distances of seven and nine metres, respectively, to the side boundaries. The proposed zinc dormer windows could also be conditioned to be finished in render to reduce the number of different external finishes proposed. Notwithstanding, I consider the proposed house design to be acceptable.
- 7.3.3. The proposed site layout takes advantage of established side and rear field boundaries. The vehicular access is at the corner of the site and the house has a building line of 26 metres. The submitted site layout plan indicates existing site boundary hedging to the rear which does not exist. A condition relating to site boundary landscaping could be included in any grant of permission. The proposed garage is approx. 50 metres from the proposed house. There appears to be no rationale for this separation. The garage should be repositioned closer to the house as set out in

- Section 3 (Design Garages) of the planning authority's 'Designing houses creating homes' document.
- 7.3.4. In conclusion, and notwithstanding the content of Section 7.2 (Site Location) of the assessment, I consider that proposed house type and site layout are acceptable in principle subject to minor alterations.

### 7.4. Traffic/Vehicular Entrance

- 7.4.1. The grounds of appeal make reference to traffic hazard, inadequate sightlines and the removal of the existing roadside boundary which would have a significant impact on the rural amenity.
- 7.4.2. The site is on a straight section of local road with a bend in the road approx. 100 metres north of the proposed site entrance. Given the relatively limited impact on the local road of a single house and its location on a straight stretch of the road, I do not consider the development would have any undue impact on traffic movements or traffic hazard.
- 7.4.3. There is an existing hedgerow along the roadside boundary which the site layout plan indicated would be removed and a set-back post and rail fence constructed. A 90 metres sightline to each side of the proposed vehicular entrance is outlined. Condition 6 of the planning authority decision sets out in detail the works to be carried out to the roadside boundary including the removal of the entire roadside boundary and provision of a 4 metres wide parking strip immediately adjoining the edge of the road. It is unclear if existing roadside hedgerow outside the site boundary also has to be removed to achieve sightlines. A letter of consent from an adjoining landowner giving permission to 'amend' roadside hedging was submitted with the application. The area under the control of this landowner has not been set out.
- 7.4.4. Both the County Development Plan 2014-2020 and the Sustainable Rural Housing Guidelines (2005) are consistent in terms of promoting the retention and preservation of hedgerows. The Plan contains a number of natural heritage and landscape policies in this regard. Section 8.7.4 (Single Houses in the Countryside Roadside Boundaries) states that the Council will normally require that hedgerows be retained as far as possible in rural areas. The Guidelines state that the removal of existing roadside boundaries, except to the extent that this is needed for a new entrance,

- should be avoided where at all possible except where required for traffic safety purposes.
- 7.4.5. The full extent of existing hedgerow that it is necessary to remove in order to achieve 90 metre sightlines has not been set out. The planning authority condition requires the entire boundary to be removed and it is possible that additional area of hedgerow outside the site boundary may also need to be removed. No appropriately detailed site layout has been submitted indicating that this extent of removal is not required in order to achieve the required sightlines. I consider that the extent of mature roadside boundary hedgerow to be removed, as proposed, to safely accommodate the proposed development, would be contrary to the relevant policies and provisions of both the County Development Plan 2014-2020 and the Sustainable Rural Housing Guidelines (2005) and the rural amenity of the area and I consider that this would be a significant contributory factor to the erosion of rural character as set out under Section 7.2 (Site Location).

#### 7.5. Wastewater Treatment

- 7.5.1. It is proposed to install a wastewater treatment system and polishing filter to service the proposed house.
- 7.5.2. The site is in an area with a locally important aquifer of moderate vulnerability. Groundwater was encountered at a depth of 0.8 metres (mottling, the watertable was at a depth of 1.1 metres) in the 1.4 metres deep trial hole. The soil was clay. Table B.2 (Response Matrix for On-Site Treatment Systems) of the EPA Code of Practice Wastewater Treatment and Disposal Systems Serving Single Houses identifies an R1 response category i.e. acceptable subject to normal good practice.
- 7.5.3. The T-test result was 28.03. A P-test was also carried out giving a result of 23.89. I consider the results to be consistent with the ground conditions observed on site. Though the trial hole and percolation test holes had been filled in the site comprises a grassed agricultural field with no indication of, for example, rushes or water ponding. Table 6.3 (Interpretation of Percolation Test Results) of the Code of Practice states that, based on the T-test result, the site is suitable for the development of a septic tank system or a secondary treatment system discharging to groundwater. Based on the P-test result, the site is suitable for a secondary treatment system with polishing filter.

- 7.5.4. The proposed site, at 0.43 hectares, is relatively large and all separation distances set out in Table 6.1 (Minimum Separation Distances in Metres) are achieved. There is adequate space on site to accommodate the proposed sand polishing filter.
- 7.5.5. I consider that the site can accommodate the proposed wastewater treatment system.

  I note that the planning authority Environment & Water Services Section had no issue with this element of the proposed development, and it was not cited as a concern in the previous application on site.

# 7.6. Appropriate Assessment

7.6.1. Having regard to the nature and scale of the development proposed and to the nature of the receiving environment, remote from and with no hydrological pathway to any European site, 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. I recommend that the planning application be refused for the following reasons and considerations.

## 9.0 Reasons and Considerations

1. Having regard to the location of the site within an area of 'strong urban influence' (Map 1.3 – Rural Area Types in County Offaly) and in a 'pressure area' (Map 1.4 – Rural Housing Policy Map) of the Offaly County Development Plan 2014-2020, Regional Policy Objective RPO 4.80 of the Eastern and Midland Regional Spatial and Economic Strategy 2019-2031, National Policy Objective 19 of the National Planning Framework and the Sustainable Rural Housing Guidelines for Planning Authorities issued by the Department of the Environment, Heritage and Local Government in April, 2005, it is considered that the applicants do not come within the scope of the housing need criteria as

set out for a house at this location. It is considered that the applicants have not sufficiently demonstrated an economic or social need to live in a rural area, having regard to the viability of smaller towns and rural settlements and, therefore, the proposed development does not comply with Regional Policy Objective 4.80 and National Policy Objective 19. In the absence of any identified locally-based need for the house, the development would contravene regional and national housing policy and objectives and would, therefore, be contrary to the proper planning and sustainable development of the area.

2. The proposed development would contribute to urban generated residential sprawl in this area, would contribute to existing ribbon development along this section of roadway, would contribute to the encroachment of random development in this rural area, would militate against the preservation of the rural environment and would lead to an inefficient and uneconomic demand for the provision of services in this rural area. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.

Anthony Kelly
Planning Inspector
18.11.2020