



An
Bord
Pleanála

Inspector's Report

ABP-307814-20

Development	The construction of an agricultural dry storage shed.
Location	Culleenduff, Strandhill, County Sligo.
Planning Authority	Sligo County Council
Planning Authority Reg. Ref.	20149
Applicant(s)	Francie Kivlehen
Type of Application	Permission
Planning Authority Decision	Refuse permission
Type of Appeal	First Party V. Refusal
Appellant	Francie Kivlehen
Observer	None
Date of Site Inspection	28 th October 2020
Inspector	Máire Daly

1.0 Site Location and Description

- 1.1. The appeal site with a stated area of 0.1 ha is located in the townland of Culleenduff approximately 1.3km south of Strandhill Village and approximately 6km west of Sligo Town. The site is comprised of agricultural grassland and is in an elevated position just below the visible rocky outcrops of Knocknarea South and Grange West. The Knocknarea Mountain forms a dramatic backdrop to the appeal site.
- 1.2. The site is bounded by the R292 Regional Road to the southwest, off which a narrow access road is proposed which is to travel up the hill eastwards to the proposed location of the dry shed. The location of the dry shed which has a stated floor area of 114sq m, is proposed in the upper north-eastern corner of an agricultural field. The larger field is bound by deciduous hedgerow and intermittent trees along the northern and eastern boundaries.
- 1.3. An existing two storey dwelling is located to the front (south) of the main site area, at a lower level on the slope and another dwelling is located approximately 30m to the east of the site along the same contour line. There is an existing entrance onto the R292, with a mature hedgerow/treeline and partial fencing on top to the west and east of the entrance. The existing entrance is used for agricultural purposes and provides access to several fields on the northern side of the R292. Ground levels on the site rise steeply from the adjoining public road (FFL15.85) so that the proposed location of the dry shed (FFL 44.3m) is approximately 30 metres above the road access point to the site.

2.0 Proposed Development

- 2.1. The proposed development is to comprise:
 - An agricultural dry storage shed of 114sq m in area and 5.2m in height; and
 - A 3.6m wide hardcore access road circa. 200m in length.

3.0 Planning Authority Decision

3.1. Decision

Permission was refused for the following reasons:

1. The proposed shed is located on a Visually Vulnerable Landscape along a Scenic Route according to the Landscape Characterisation Map for the County, as per Sligo County Development Plan 2017-2023.

The development is not in accordance with the design and siting criteria for new development in rural areas as set out in Section 13.4.2 and conflicts with Landscape Policies P-LCAP-1/P-LCAP-2 of the County Development Plan 2017-2023 and accordingly would be contrary to the proper planning and sustainable development of the area.

2. Having regard to the absence of adequate proposals for the achievement of adequate sight lines for the development, it is considered that the traffic movements generated by the proposed development would interfere with the safety and free flow of traffic at this location and would endanger public safety by reason of traffic hazard.

3.2. Planning Authority Reports

3.2.1. Planning Reports

The recommendation to refuse permission in the Area Planner's Report reflects the decision of the Planning Authority.

- The area planner expressed serious concerns in relation to the location of the proposed development on the slopes of Knocknarea Mountain and the visual implications of same. Due to the sensitive location which is along a scenic route within a visually vulnerable area, it was considered that the potential for further development on these slopes is limited if not non-existent.
- The potential cumulative impact of development on the slopes of Knocknarea as well as the precedence created for similar such development at the location is of particular concern to the area planner.

- The visual implications of the 3.2m wide, 200m long access road is also a concern as is the visual implications of changing an existing agricultural entrance into a formal access entrance and the necessary works to create sufficient visibility along the R292.
- The proposed use of the storage shed was not stated as part of the application and no justification of the need of the shed at this location at the highest part of the field was given.
- Concerns were raised by the area engineer about the availability of sightlines in a north westerly direction towards the village of Strandhill. The area planner also has concerns that the works required to achieve the necessary sightlines (removal of mature and attractive hedgerow and dry stone wall) would have a significant negative impact on the visual amenities and rural character of the scenic route.
- The shed is proposed circa. 31m to the west of an existing house and as it is not possible to say what the shed is to be used for, it is therefore not possible to definitively say that there will be no impact on residential amenity.

3.2.2. Other Technical Reports

- Area engineers report dated 15/06/2020 requested further information as follows:
 - Revised drawing to show that sufficient sight lines can be achieved in the Strandhill direction.
 - A revised drawing showing the treatment of stormwater from the proposed access road including the capture of same at the interface with the public road.
- Environment Section report dated 08/06/2020 which stated no objection in principle subject to conditions.

3.3. Prescribed Bodies

None received.

3.4. **Third Party Observations**

None received.

4.0 **Planning History**

No planning history on site.

5.0 **Policy Context**

5.1. **Development Plan**

The operative Development Plan is the Sligo County Development Plan 2017-2023.

5.1.1. **Section 7.4.4 Heritage landscapes**

The proposed development is located within an area designated under the Landscape Characterisation Map (Section 7.4 Landscape Character) as a '*Visually Vulnerable Areas*' with the area to its immediate north designated as a '*Sensitive Rural Landscapes*'. The development is to be accessed off the R292 Regional Road which is designated as a '*Scenic Route*' under the current Plan.

The following policies contained in the Sligo County Development Plan 2017-2023 seek to protect such areas and routes listed above from inappropriate development and list specific criteria which needs to be demonstrated by development proposed in these areas.

- **Policy P-LCAP-1** Protect the physical landscape, visual and scenic character of County Sligo and seek to preserve the County's landscape character.
- **Policy P-LCAP-2** Discourage any developments that would be detrimental to the unique visual character of designated Visually Vulnerable Areas.
- **Policy P-LCAP-3** Preserve the scenic views listed in Appendix F and the distinctive visual character of designated Scenic Routes. In all cases, strict location, siting and design criteria shall apply, as set out in Section 13.4 Residential development in rural areas (development management standards).

- **Policy P-LCAP-4** Strictly control new development in designated Sensitive Rural Landscapes.
- **Policy P-LCAP-5** Protect the historic and archaeological landscapes of the County.

5.1.2. **Section 7.2.7 The Cuil Irra Peninsula – Carrowmore, Knocknarea and Carns Hill**

The proposed site is located in the above area, on the foot of Knocknarea and the following policy is relevant in this case:

- **Policy P-AH-3** Require the preservation of the context, amenity, visual integrity and connection of archaeological monuments to their setting.

5.1.3. **Section 13.9.1 Agricultural developments**

- Need to consider - Protection of residential amenity, Safe access and adequate sightlines, assessment of visual impact
- location and siting criteria similar to those outlined in Section 13.4 Residential development in rural areas.

5.1.4. **Section 13.4.2 Site selection**

The Planning Authority will have regard to the following when considering such a planning application in a rural area:

- A. The Landscape Characterisation Map;
- B. Site location - avoid elevated or exposed locations such as hill slopes;
- C. Vehicular Access - Access from public roads should be managed safely and should require only minimal removal of existing roadside boundaries.

5.2. **Natural Heritage Designations**

- The nearest Natura sites are the Ballysadare Bay SAC (Site code 000622) and SPA (Site code 004129) which are located approx. 100m west of the appeal site.
- The Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC (site code 000627) and Cummeen Strand SPA (Site code 004035) are located approx. 2.7km north of the site.

- The Knocknarea Mountain and Glen proposed Natural Heritage Area (Site code 001670) is located to the immediate northeast of the site.

6.0 The Appeal

6.1. Grounds of Appeal

6.1.1. The grounds of appeal, as raised by the first party appellant can be summarised as follows:

- The applicant argues that the proposed structure will not be visible from the R292 regional road or the L3503 local road due to the existing intermediary trees and hedging on site, shown on DRG.201#3. The applicant has submitted four photographs also in support of their appeal, these show the site as viewed from the public road.
- The existing agricultural entrance feeds multiple plots and can only be reconfigured as per drawings submitted. A residential style alignment of sight lines therefore is not possible due to the vast destruction of trees to the west of the property entrance and private property to the east.
- The purpose of the agricultural shed is to store winter feed on site and therefore to reduce the number of trips to the site, as daily trips would not then be required to feed livestock.
- The inclusion of a hardcore road as part of the proposal was to cancel any possible discharge of debris onto the R292 roadway. The hardcore would restrict the formation of tractor tyres ravines which would otherwise occur in the topsoil and result in channels which would carry water to the public road below. In addition, with a hard surface road less debris from tyres would also be likely to fall on the public road.
- The applicant also highlights that no objections or observations were lodged by any of the neighbouring properties or any other bodies.

6.2. Planning Authority Response

- 6.2.1. A response from the planning authority was received on 04/09/20. This requested that the Planner's Report dated 09/07/20 should be referred to and that the Planning Authority had no further comments to make on the appeal.

6.3. Observations

- None.

7.0 Assessment

- 7.1. I consider the main issues in determining this appeal are as follows:

- Landscape and Visual Impact
- Access and Traffic Safety
- Appropriate Assessment

7.2. Landscape and Visual Impact

Visual Impact

- 7.2.1. I note the Area Planner's comments regarding the limited capacity of this extremely sensitive landscape to absorb any further development. The proposed shed with a ridge height of 5.2m is to be located in an agricultural field, in an elevated position (Finished Floor Level (FFL.) 44.3m) to the south of Knocknarea. The applicant argues that the proposed dry shed will be located within an area that is visually sheltered by intermediary trees and hedging on site. Section 13.9.1 of the Development Plan states that structures not forming part of a farm complex should be integrated into the landscape by means of appropriate siting, external colouring and screening. On site inspection I noted that there was an established treeline and hedgerow along the field boundaries to the site's west and north, including an existing stone wall boundary, however the remainder of the larger agricultural field to the front of the proposed site is exposed and slopes steeply to the south. The next screening belt present is comprised of low hedgerow and intermittent trees, approximately 65m from the front of the proposed shed. This existing screening belt is at a FFL. of 30m, which is at a level approx. 15m lower than the FFL of the

proposed shed. Therefore, it is my opinion that the existing screening on site does not adequately shelter the proposed development.

Landscape Sensitivity

- 7.2.2. In addition to the lack of screening on site, the proposed development is also located within an area which is extremely sensitive to new development as outlined in the Sligo County Development Plan. The appeal site is located within a '*Visually Vulnerable Area*', such areas are located within the environs of archaeological and historical sites, in this case the heritage landscape of Knocknarea, and have extremely low capacity to absorb new development. The Regional Road, R292, runs in an east west direction to the south of the site. This roadway is designated as a '*Scenic Route*' under the current Development Plan. The R292 affords unique scenic views of Knocknarea and in the vicinity of the site is bound on the northern side by an old stone wall boundary and established hedgerow/treeline which adds to the character of the route. Section 13.4.2 of the Development Plan sets out the location and siting criteria for locating a house in the landscape, Policy P-LCAP-3 states that the same criteria apply to the location of agricultural developments. This section states that the location of new agricultural developments in designated *Visually Vulnerable Areas*, in sensitive landscapes or along scenic routes will generally be discouraged. As part of the development the applicant proposes to construct a 200m hardcore roadway linking the site to the R292. In my opinion the scarring effect that would result from the constriction of this route at 3.2m in width, up the length of the existing agricultural field, in this scenic area would be considered visually significant and at odds with the protective policy outlined in the Development Plan.
- 7.2.3. Policy P-LCAP-2 of the development plan seeks to discourage any developments that would be detrimental to the unique visual character of designated '*Visually Vulnerable Areas*' and Policy P-LCAP-3 seeks to preserve the distinctive visual character of designated '*Scenic Routes*'. The proposed development by virtue of its elevated position would result in negative impacts on both the *Scenic Route* and the *Visually Vulnerable Area*. While I acknowledge that the proposed shed may only be visible in glimpses from the R292 and the nearby L3503 (Glen Road), the impact that this development would have cumulatively with other development along this contour level of Knocknarae would be considered significant.

7.2.4. In addition to the impact on the '*Visually Vulnerable Area*', the site is also located immediately adjacent to the boundary of a designated '*Sensitive Rural Landscape*'. These areas are defined as the most sensitive within the County, are highly visible and have intrinsic scenic qualities with a very low capacity to absorb new development. Strict control over new development in these areas is afforded under Policy P-LCAP-4 of the Development Plan. In addition to the impact on the '*Visually Vulnerable Area*', it is considered that the siting of the proposal within such close proximity to this more sensitive, highly valued landscape, would also detract from the scenic value of this designated area and therefore be contrary to the strong protective policies presented in the Development Plan.

7.3. **Access and Traffic Safety**

- 7.3.1. The applicant proposes to use the existing agricultural entrance along the northern side of the R292 to access the site. The existing entrance is historic and provides access to multiple agricultural plots. The applicant states that the provision of an agricultural shed for storage of feed on site will reduce the number of visits required to the site and use of the entrance. While the applicant's comments are noted, the development proposed includes an additional access road and an additional farm building on site and frequency of use of the entrance to this site cannot be controlled by the Board. Therefore, those requirements listed under Section 13.9.1 of the Development Plan *Agricultural development* in relation to safe access and appropriate sightlines to agricultural developments still need to be complied with.
- 7.3.2. Following a site visit, it was noted that the existing visibility from the entrance in both directions is extremely poor and this is exacerbated by the narrow alignment of the R292 at this point also. The applicant states that a 'residential style alignment' of sightlines is not possible as this would require the removal of a vast amount of mature trees to the west of the site entrance and works to private property outside of the applicant's ownership to the east. To achieve the required sightlines removal of a large proportion of the existing hedgerow would be required and although this may satisfy sightline requirements it would lead to significant visual impacts on both the designated *Scenic Route* and the *Visually Vulnerable Area*. In summary as the required sightlines have not been provided at the proposed site entrance, provision of safe access to and egress from the site cannot be achieved and therefore it is

considered the proposed development would endanger public safety by reason of traffic hazard.

7.4. Appropriate Assessment

- 7.4.1. Having regard to the nature and scale of the proposed dry shed and separation distance to the nearest 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 permission is refused for the reasons and considerations set out below.

9.0 Reasons and Considerations

1. The site of the proposed development is located within a 'Visually Vulnerable Area' as set out in the current Sligo County Development Plan 2017-2023, where emphasis is placed on the importance of designing with the landscape and of the siting of development to minimise visual intrusion. Having regard to the topography of the site, the elevated positioning of the proposal and the scarring effect of the extensive access road, it is considered that the proposed development would form a discordant and obtrusive feature on the landscape at this location, would seriously injure the visual amenities of the area, would fail to be adequately absorbed and integrated into the landscape, and would set an undesirable precedent for other such prominently located development in the vicinity of Knocknarea. The proposed development would, therefore not be in accordance with the siting criteria for new development in Visually Vulnerable Areas as set out in Section 13.4.2 and policies P-LCAP-1 and P-LCAP-2 of the Sligo County Development Plan 2017-2023 and would therefore be contrary to the proper planning and sustainable development of the area.

2. It is considered that the proposed development would endanger public safety by reason of traffic hazard due to the lack of provision of adequate sightlines in both directions at the entrance to the site onto the R292 Regional Road.

Máire Daly
Planning Inspector

12th October 2020