



An
Bord
Pleanála

Inspector's Report ABP-309970-21

Development	Erection of two semi - detached houses.
Location	Gallwey's Hill, Tramore, Co. Waterford.
Planning Authority	Waterford City and County Council
Planning Authority Reg. Ref.	2145
Applicant(s)	Richard and Caroline Godsil and Jane Fuller
Type of Application	Permission
Planning Authority Decision	Refuse permission
Type of Appeal	First Party
Appellant(s)	Richard and Caroline Godsil and Jane Fuller
Observer(s)	<ol style="list-style-type: none">1. Fergal and Jai Bonner2. Marc O Cathasaigh3. Donnacha and Deirdre O Maidin4. Dr. Michael O' Meara and others5. Mary Walsh

6. Cllr. Joe Conway
7. Aine Swift
8. John McDonald
9. Marie and Patrick Walsh
10. Paul Flynn and Samantha Richardson
11. Fionnuala Kennedy
12. Alan Brennan
13. Bridget Mahon
14. Laura Swift

Date of Site Inspection

12th May 2022

Inspector

Emer Doyle

1.0 Site Location and Description

- 1.1. The subject site is located within the settlement boundary of Tramore, Co. Waterford. The site is situated overlooking and directly on the cliff above Tramore Beach at Gallwey's Hill. Access to the beach is in close proximity from steps at Ladies Slip.
- 1.2. Gallwey's Hill is one of the main routes through the town and is a steep hill with double yellow lines on both sides and a footpath on the sea side of the road only. Development in the vicinity consists of a wide variety of residential properties ranging from single storey properties to apartment blocks on the opposite side of the road.
- 1.3. The view from the site is spectacular and I understand that it is a popular location for viewing the St. Patrick's Day parade and fireworks displays.
- 1.4. The site is overgrown at present and site topography rises towards the northeast and ranges from 19.5 to 30m OD. The roadside boundary consists of a low random rubble stone wall.

2.0 Proposed Development

- 2.1. The proposed development consists of the development of 2 No. semi-detached dwellings as follows:
 - House A: 4 bedrooms, House B: 2 bedrooms
 - The development provides for a lower ground floor, a ground floor and a first floor with shared car parking for 4 No. cars, a shared vehicular access, and a shared plant room. Pedestrian access is proposed for House A only.
 - External materials include dark grey/ black brick with similar pointing, bronzed aluminum windows and doors and a sedum roof finish.
 - The development is proposed to be connected to the public water supply and drainage networks.

3.0 Planning Authority Decision

3.1. Decision

3.1.1. Permission refused for 2 No. reasons as follows:

1. Traffic movements arising from the proposed development would endanger public safety by reason of traffic hazard due to the inadequate visibility available at the location of the proposed entrance, the poor vertical and horizontal alignment of the public road as evidenced in particular by the blind bend and forked junction proximate to the site. It is also considered that the additional traffic movements arising from the proposed development would conflict with pedestrian movements on the public footpath thereby creating further traffic hazard.
2. The Waterford County Development Plan 2011-2017, as varied and extended, and Tramore Local Area Plan (as extended and varied) recognize the necessity that future management and development of coastal areas is carried out in a manner that protects coastal functions and values including natural coastal defences, habitat value and landscape character. On the basis of the information submitted with the application, and given the significant excavations required to accommodate the proposed floor plate the Planning Authority is not satisfied that the proposed development would not compromise the structural stability of the cliff face. Furthermore having regard to the Waterford Climate Change Adaptation Plan 2019 and the information submitted with the planning application, the Planning Authority is not satisfied that the proposed development would not result in further coastal erosion and/or impacts of climate change. The proposed development would therefore be contrary to the policy provisions of the Waterford County Development Plan 2011-2017, as varied and extended, and the proper planning and sustainable development of the area.

3.2. Planning Authority Reports

3.2.1. Planning Reports

- The planner's report expressed concern regarding the scale and visual impact of the proposed development when viewed from Gallwey's Hill and other significant views held from the scenic route including the Back Strand and Brownstown Head. Concern was also expressed regarding the view from Tramore Beach. In addition, concerns were raised in relation to traffic safety and coastal zone erosion.

3.2.2. Other Technical Reports

Roads Department: Not in favour of the proposed development in particular the location of the entrance and steep incline on Gallwey's Hill.

Sightlines restricted onto public road, development deemed to give rise to traffic hazard.

Potential for conflict between pedestrians/ parked cars on public road.

Concerns from a coastal protection perspective given proximity to cliff edge- intrusive construction works could compromise site.

Heritage Officer: Development can be screened out for AA. Main issues relate to Coastal Zone, Management and impact on cliffs to include coastal erosion- Planning Authority need to be satisfied that the proposed development will not be at risk. Also impacts on views and seascapes.

3.3. Prescribed Bodies

3.3.1. No reports.

3.4. Third Party Observations

3.4.1. A total of 106 valid observations were submitted to the Planning Authority. The main issues raised are similar to the issues raised in the observations submitted to the Board.

4.0 Planning History

PA Reg. Ref. 2021/1

Certificate of Exemption under Part V of the Planning and Development Act granted.

5.0 Policy Context

5.1. Development Plan

5.1.1. Tramore Local Area Plan 2014-2020

The site is predominantly zoned as Town Centre: To provide for an integrated mix of residential, commercial, community, and social uses within the town or village centre.

An area of the site close to the cliff edge is zoned as Open Space: To preserve and enhance Open Space Areas and Amenity Areas for passive and active recreational uses, including the preservation of grass verges, hedgerows and tree stands.

Policy CZM 3 To protect the scenic value of the Coastal Zone in Tramore including landward and seaward views and continuous views along the coastline and manage development so it will not materially detract from the visual amenity of the coast.

Policy CC 1: To incorporate climate change adaptation planning in accordance with DoECLG guidelines in the future management and sustainable development of the Tramore Coastal zone.

Waterford County Council Development Plan 2011-2017

Section 8.15 deals with Coastal Zone Management

Objective CP 4: To protect the scenic value of the Coastal Zone from Cheekpoint to Youghal including landward and seaward views and continuous views along the coastline and manage development so it will not materially detract from the visual amenity of the coast.

Section 8.1 – Scenic Routes

Appendix A9: Scenic Landscape Evaluation based on the capacity of the environment to absorb new development ranging from degraded to vulnerable.

Scenic routes indicates public roads from which views and prospects of areas of natural beauty and interest can be enjoyed. There is an onus on developers/ applicants for planning permission to demonstrate that any proposed development

shall not negatively impact on the character of a scenic route and that there shall be no obstruction or degradation of views towards visually vulnerable features or sensitive areas.

Policy 6.6(b) Scenic Routes

Scenic Route No. 14 From Ballyvoyle Head east on the R675 to the junction with the R677. Continuing South along the R675 to Bunmahon, east via Kilmurrin and Annestown and Northeast to Fennor. East onto Tramore and north to Waterford city.

Climate Change Adaptation Strategy 2019-2024

The local authority adaptation strategy takes on the role as the primary instrument at a local level to:

- Ensure a proper comprehension of the key risks and vulnerabilities of climate change.
- Bring forward the implementation of climate resilient actions in a planned and proactive manner.
- Ensure that climate change adaptation considerations are mainstreamed in all plans and policies and integrated into all operations and functions of the LA.

5.2. Natural Heritage Designations

- 5.2.1. The site is not located within any European site. The closest such European sites to the subject site are Tramore Back Strand SPA and Tramore Dunes and Backstrand SPA which are located c. 1.3km to the east.

5.3. EIA Screening

- 5.3.1. 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 and a screening determination is not required.

6.0 The Appeal

6.1. Grounds of Appeal

6.1.1. The grounds of appeal can be summarised as follows:

- Appendix B includes a revised drawings showing sightlines to the nearside of the road to the west.
- It is considered that the proposed development will not endanger pedestrian or traffic safety.
- However, if the Board disagree with this an alternative revised entrance location is proposed in Appendix D.
- The application was accompanied by engineering reports by Frank Fox and Associates. It was not considered that the structural stability of the cliff was a design issue due to their understanding of the soil geology following onsite trial pit investigations.
- To ensure the Council's concerns are fully addressed, the appeal response is accompanied by a report in relation to geophysical investigations carried out on the site by Apex Geophysics.
- Based on geophysical data the interpreted dolerite bedrock in the southwest of the site has good potential for a founding layer at depths ranging from 3 to 8m bgl, and the shale/ very stiff boulder clay in the northeast also has potential at depths ranging from 7.5 to 9m bgl.
- Susceptibility to erosion from the seaward side of the site is not within the scope of the report.
- The dig required to facilitate the houses is in a relatively small area and extends to a maximum depth of 3m.
- The Erosion Map for Tramore including in The Irish Coastal Protection Strategy Study is attached to Appendix G. This identifies areas of potential

erosion and the application site is not identified as an area which is at risk of erosion.

- A subsequent appendix was produced which sets out flood mapping for the Mid Range Future Scenario. This shows no flood risk on site and the high water mark below the site boundary (Figure 18).
- The rock armour and fencing were installed in c. 1998 to provide protection to the cliff face. There have been several extreme weather events since then which had no impact on the cliff face due to the distance from the sea and the protection in place.
- The proposed development will not increase the impacts of climate change.

6.2. **Planning Authority Response**

- No response.

6.3. **Observations**

6.3.1. A total of 14 No. observations were submitted to the Board. The observations submitted can be summarised as follows:

- Concern regarding climate change
- Concern regarding visual impact
- Concern regarding coastal erosion and climate change
- Concern regarding traffic safety
- Concern regarding impact on tourism

6.4. **Further Responses**

6.4.1. None.

7.0 Assessment

7.1. Having regard to the above, and having inspected the site and reviewed all documents on file, the following is my assessment of this case. Issues to be considered in the assessment of this case are as follows:

- Visual Impact
- Traffic Safety
- Impact on Climate Change and Coastal Erosion
- Appropriate Assessment

7.2. Visual Impact

7.2.1. I refer the Board to Figures 2 and 3 of the appeal response together with the numerous photographs of the view made on submissions on this application both at application stage and appeal stage. It has been pointed out by a number of objections that the photomontages submitted by the applicant show the view in shadow and are not representative of the quality of the view. Whilst I accept that the applicant's photomontages do not show the view at its best, there is more than adequate photographic information on file for the Board to adequately consider this issue.

7.2.2. This is an extremely sensitive site on one of the main approach roads to the town of Tramore. It sits on top of a cliff overlooking Tramore Beach. I have read the objections submitted to the Board together with the objections submitted to the Planning Authority and it is clear that the view from this location is of extremely high importance and significance to the town of Tramore. The view of Tramore beach from this location has been used in postcard, film material, TV programmes etc, and is a popular viewing spot for the St. Patrick's Day Parade, and fireworks displays. An objection submitted to the Planning Authority from Waterford Camino Tours states that their 'tours include a walk by this site and this development would take away the iconic view across the Bay from Gallwey's Hill for locals and visitors alike'. Another objection submitted to the Planning Authority from Dr. Ted O' Keefe points out that 'this is a prominent location with world famous panoramic views across the full

sweep of the bay and that it is the only green natural space in Tramore with such a view'. Many of the objections have referred to the fact that the panoramic view from this location has appeared in commercial postcards (John Hinde 1969) including calanders right up to the present time.

7.2.3. On the day of the site inspection, the area surrounding the site was busy with people walking past the site both on the Gallwey's hill side and on the beach side. Our lady's slip is a very popular sea swimming spot and there were numerous people swimming in the sea and a number of people were using the steps close to the site as their changing spot.

7.2.4. It is a policy objective under CZM 3 of the Tramore Local Area plan to protect the coastal zone in Tramore including landward and seaward views. Whilst the design is of high quality, I have concerns regarding the impact of same at this location as the site is extremely sensitive from both the beach side and the Gallwey's hill side. I refer the Board to the photomontages submitted with the application. In my opinion, the proposed development would impact negatively on the important views from Gallwey's hill and have a significant adverse effect on the character and appearance of the area as viewed from the R675 designated scenic route (No. 14 Development Plan Appendix A9). In addition to the scale and form of the development, the length of the building is 17.9m and in my opinion would constitute a visually incongruous element when viewed from the beach side. Whilst I accept that attempts have been made to design the dwellings sensitively from the front, the site is particularly exposed from Tramore Beach and the impact of both the excavation required and the length and scale of the rear elevation would negatively impact on the area in my view. I also have concerns in relation to the dark grey/ black finish as it is not native to the area and unsuitable for this coastal location in my view. It is my opinion that the proposed development would have an overall adverse impact on the streetscape and on the visual quality of Gallwey Hill and would be contrary to Policy CZM 3 of the Tramore Local Area Plan, Policy ENV5 of the Waterford Development Plan and more particularly to Objective CP4 which seeks to protect the scenic value of the coast and to '...manage development so that it will not materially detract from the visual amenity of the coast.'

7.3. Traffic Safety

- 7.3.1. I note that the main issues regarding traffic safety were raised in the first reason for refusal. It was considered that there was inadequate visibility at the location of the proposed entrance, poor vertical and horizontal alignment of the public road as evidenced by the blind bend and forked junction proximate to the site. It was considered in the reason for refusal that the additional traffic movements arising from the proposed development would conflict with pedestrian movements on the public footpath thereby creating further traffic hazard.
- 7.3.2. The planner's report noted that 49m sightlines illustrated on the submitted roadmap were taken from the road edge rather than the near road edge as required by the County Development Plan standards. The concerns expressed by the District Engineer regarding visibility and ramped access (and the steepness of same) were noted together with the potential conflict with both pedestrian and traffic movements including confusion between turning movements into the site and parked cars on the road. Concern was also expressed in relation to the proximity to the forked junction and the fact that sightlines to the west are restricted by a bend.
- 7.3.3. The response to the appeal has submitted a revised drawing showing sightlines to the nearside of the road to the west (Appendix B and Figure 9). It is stated that the proposed development complies with The Design Manual for Urban Roads and Streets. It is stated that the council's assertion that access from the car park road to the road is a steep ascent is incorrect as there is little difference in the levels at this location. It is stated that there are several other examples on Gallwey's Hill of the type proposed and the number of movements generated by two dwellings will be low. In the event that the Board is minded to disagree with the access proposed, details of an alternative access have been provided in Appendix D.
- 7.3.4. The site is located in the 50kph speed limit zone in a highly accessible location in close proximity to the centre of Tramore. The site is zoned as Town Centre and is served by two bus routes. There are double yellow lines on both sides of the road and a number of road markings advising motorists to slow down. I understand that the double yellow lines are relatively new as photographs on file show cars parking on the opposite side of the road and many of the objections refer to the danger this is causing. There is a footpath on one side of the road only adjacent to the site. There

are a number of factors which increase traffic hazard at this location including a very steep hill, width and alignment of the road, pedestrian footpath on one side of the road only and proximity to a forked junction. I also have concerns that cars would need to either drive in and reverse out or vice versa having regard to the design of the car parking area.

7.3.5. I accept the response from the applicant that adequate sightlines can be provided at this location in accordance with The Design Manual for Urban Roads. I also accept that the levels at the access gate are not dangerous so as to cause an additional traffic hazard at this location. Figure 10 of Appendix C shows the level of the proposed car park is 23.677mOD. This then drops to 23.544mOD on the road which is a level difference of 0.67m and is considered to be satisfactory. The revised access submitted would be a safer option in my view having regard to the increased distance from the forked junction should the Board be minded to grant permission for the proposed development.

7.3.6. However, as evidenced on my site inspection in early May, this road is very popular with pedestrians, cyclists and vehicles. Many additional tourists unfamiliar with the road would be driving on the road during the busy tourist season which would add to my concerns regarding traffic safety. Pedestrian facilities are poor in the vicinity with just one narrow footpath adjacent to the site. The road itself is located on a steep hill with double yellow lines on both sides. These factors, taken together with the proximity to the forked junction would give rise to a traffic hazard in my view. As such, I would consider that the proposed entrance serving two dwellings and the additional traffic movements generated by the proposed development would lead to conflict between road users and as such would result in a traffic hazard.

7.4. Impact on Climate Change and Coastal Erosion

7.4.1. Reason for Refusal No. 2 as attached by the Planning Authority notes that significant excavations are required to accommodate the proposed floor plate and considered that on the basis of information submitted, the Planning Authority were not satisfied that the proposed development would not compromise the structural stability of this area of cliff face. It was also considered that having regard to Waterford Climate Change Adaptation Plan 2019 and the information submitted with the application, the

Planning Authority were not satisfied that the proposed development would result in further coastal erosion and/or impacts of climate change.

- 7.4.2. It is clear from the drawings submitted that significant excavations would be required to construct the proposed dwellings. The dwellings measure c. 17.9m in length and a lower ground floor is proposed to accommodate 2 No. bedrooms for House A and the shared utility/ plant room.
- 7.4.3. The appeal response includes a report on the Geophysical Survey at this site. Investigations were carried out on the site in April 2021 consisting of 2D Electricity Resistivity Tomography and Seismic Refraction profiling. Two layers were identified: an upper layer of generally firm material which ranges from 2.5 to 6.5m in thickness. The seismic data showed a competent layer at a depth ranging from 3m below ground level in the southwest to 9m below ground level in the northeast. The soils have been interpreted from the ERT data as gravelly silty clay at the southwestern end of the site changing to sandy gravelly clay in the northeast of the site. It was concluded that the interpreted dolerite bedrock in the southwest of the site has good potential for a founding layer at depths ranging from 3 to 8m bgl, and the shale/ very stiff boulder clay in the northeast also has potential at depths ranging from 7.5 to 9m bgl.
- 7.4.4. In terms of the concerns raised regarding coastal erosion and climate change, the appeal response refers to the Irish Coastal Protection Strategy Study (ICPSS) Phase 3- South Coast. The ICPSS study provides a predictive Erosion Map for Tramore for the year 2050. This site is not identified as an area which is at risk of erosion. A review of the CFRAMS Mapping for the area indicates that the proposed development is located within a low flood risk zone. Section 5.2.2.1.4 notes that the rock armour and fencing at this location were installed in c. 1998 to provide protection to the cliff face. As noted in the Climate Change Adaptation Strategy, there have been several extreme weather events since then. It is pointed out these weather events did not impact on the cliff face due to the distance from the sea to the cliff face and the protection in place.
- 7.4.5. The response considered that the application proposes two modern sustainable dwellings within a sustainable urban location. The dwellings, by virtue of their location, will encourage more sustainable trips and therefore reduce the occupants'

car usage. The dwellings will be constructed of modern materials and to the high standards required. Various measures will be incorporated into the dwellings to ensure they are as sustainable as possible. It is concluded in the appeal response that rather than contributing to climate change, the dwellings will be highly sustainable.

- 7.4.6. I accept that the sites are in a location zoned as town centre and close to the town of Tramore and that modern building methods will be used to ensure the dwellings are as sustainable as possible. Nonetheless, there is evidence of coastal erosion at this location already when viewed from the seaward side. I refer the Board to the photographs submitted with the observation from Michael O' Meara and others which show the effects of coastal erosion over the years. The observation states that the photos clearly show the evidence of coastal erosion on this area over the years and clearly evidence that the bare earth exposed at the cliff face is a clear indication of continuing erosion and collapse. There are numerous objections on the file from local people expressing the same concerns.
- 7.4.7. In terms of the integrity of the cliff, I note that consultants ByrneLooby, a civil engineering firm have been employed by Fergal and Jai Bonner to assess their concerns. The main issues raised are that no information has been given in terms of how the excavations will be completed and/or how such excavations will be controlled to ensure no negative impact on the overall cliff stability. Concern is also expressed that whilst a raft slab foundation is suggested by the engineers for the project, the geophysical report attached to the appeal outlines its assumption that piled foundations are to be utilised. The geophysical report also outlines that further investigations should be carried out to verify and validate the ground conditions and the report caveats that the susceptibility of the site to seaward erosion is not included in their assessment.
- 7.4.8. I share the concerns expressed in the observations and concur with the reason for refusal by the Planning Authority in terms of insufficient information in relation to the impact of erosion. It is not known how much excavation is required for the proposed development and how this will impact on erosion and the integrity of the cliff face at this location. No details have been submitted in relation to methods of construction at this vulnerable location. Climate change is unpredictable and contrary to the appeal response, there are already impacts from extreme weather events on the cliff face

and the existing rock armour and palisade fence at this location visible from Tramore Beach. I am not satisfied that proposed development would not result in further coastal erosion and/or impacts of climate change. The proposed development would, therefore be contrary to the policy provisions of the Tramore Local The Waterford County Development Plan 2011-2017 (as extended and varied) and Tramore Local Area Plan 2014-2020 (as extended and varied) and contrary to the proper planning and development of the area.

7.5. Screening for Appropriate Assessment

- 7.5.1. The application is accompanied by an Appropriate Assessment Screening Report dated October 2020.

Project Description and Site Characteristics

- 7.5.2. The application proposes the erection of two semi-detached dwellings on a site of 0.1631 hectares. The dwellings are proposed over 3 No. floors. The site is located at a scenic location overlooking Tramore Lower Strand. It is proposed to connect the dwellings to mains water and drainage. There are no watercourses on the site.

- 7.5.3. The following Natura Sites are located in the vicinity.

Tramore Back Strand SPA Site Code 4027 c. 1.3km to the east.

Tramore Dunes and Backstrand Site Code 0671 c. 1.3km to the east.

Mid-Waterford Coast SPA Site Code 4193 c. 2.1km to the west.

River Barrow and River Nore SAC Site Code 2162 c. 12km to north east.

Hook Head SAC Site Code 0764 c. 14.6km to the south east.

Lower River Suir SAC Site Code 2137 c. 11.1km to the north.

- 7.5.4. Detailed Conservation Objectives are available on the NPWS website for the above sites. The overall aim of the conservation objectives for each of the sites is to maintain or restore the conservation status of the said habitats and species.

Assessment of likely effects

7.5.5. The site is not located within any of the European sites and is not directly adjacent to such sites. Therefore, no direct impacts would arise from the proposed development. In view of the separation distances, nature of the qualifying interests, lack of hydrological connection and the conservation objectives of the following sites:

- River Barrow and Nore SAC (Site Code 2137)
- Hook Head SAC (Site Code 0764)
- Lower River Suir SAC (Site Code 2137)
- Mid- Waterford Coast SPA (Site Code 4192)

There is no potential for these designated sites to be indirectly affected by the proposed development.

7.5.6. The screening report identifies that it is only the nearest two that could be vulnerable in any way – Tramore Back Strand SPA and Tramore Dunes and Backstrand SPA

7.5.7. The screening report identifies the qualifying interests of both these sites and the conservation objectives. Tramore Dunes and Back Strand is a site of major ecological importance for the range of good quality coastal habitats which occur including fixed sand dunes, which are listed as a priority habitat on Annex 1 of the EU Habitats Directive. The site has a remarkably rich flora, featuring a number of rare and protected species, and the intertidal area is important for wintering wildlife. Tramore Back Strand SPA is of high ornithological importance for wintering waterfowl. Tramore Back Strand is also a Ramsar Convention site.

7.5.8. The screening report assesses potential impacts arising from the development in the construction phase for Tramore Back Strand SPA (Site Code 4027) and Tramore Dunes and Backstrand SPA (Site Code 0671). There is no watercourse on site but material could be dislodged onto the beach below during construction where it would have a theoretical link with the Dunes and Backstrand through the sea, although there would be considerable dilution of any sediment or chemical material. The likelihood of spillage of concrete or chemicals on site during construction that would penetrate the Back Strand in sufficient quantities to have any effect on wildlife is so

remote that it can be said that there are no likely impacts of the project on the Natura 2000 sites.

- 7.5.9. In terms of cumulative effects, I have had regard to the provisions of the current Waterford County Council Development Plan and to the planning authority's planning application database. I am not aware of any large planned or permitted developments in the vicinity.

AA Screening Conclusion

- 7.5.10. The site is fully serviced within an urban area and best construction management methods would constitute an integral component of construction works. It is reasonable to conclude that on the basis of information on the file, which I consider adequate in order to issue a screening determination, that the proposed development, individually and in combination with other plans or projects would not be likely to have a significant effect on any European Site and in particular Tramore Back Strand SPA (Site Code 4027) and Tramore Dunes and Backstrand (Site Code 0671) or any other European Site in view of the site's Conservation Objectives and a Stage 2 Appropriate Assessment (and submission of a NIS) is not therefore required.
- 7.5.11. In reaching this conclusion, I took no account of mitigation measures intended to avoid or reduce the potentially harmful effects of the project on any European site.

8.0 Recommendation

- 8.1. I recommend that planning permission be refused for the following reasons

9.0 Reasons and Considerations

1. Having regard to the scale, context, form, finishes and length of the proposed dwelling together with the extent of excavations proposed, it is considered that the proposed development would seriously injure the visual amenities at this visually sensitive site on one of the main approach roads to Tramore, overlooking Tramore Bay and in a visually vulnerable coastal location. As such, it is considered that the proposed development would be contrary to Policy ENV5 and Objective CP4 of the Waterford County Development Plan 2011-2017(as extended and varied) and Objective CZM3 of the Tramore

Local Area Plan 2014-2020 (as extended and varied) with regard to landscape and coastal protection, would seriously injure the visual amenities of the area and would therefore be contrary to the proper planning and sustainable development of the area.

2. The proposed development includes the creation of a new access for four car parking spaces. Having regard to the location of the site on a steep hill, the availability of a public footpath on one side of the road only on a popular walking route to Tramore, the poor vertical and horizontal alignment of the public road as evidenced by double yellow lines on both sides of the road and the proximity to a forked junction, it is considered that the proposed development would endanger public safety because of the additional traffic turning movements the development would generate and would lead to conflict between road users, that is, vehicular traffic, pedestrians and cyclists. The traffic movements generated by the proposed development would endanger public safety by reason of traffic hazard.

3. The Waterford County Development Plan 2011-2017 (as extended and varied) and Tramore Local Area Plan 2014-2020 (as extended and varied) recognize the necessity that future management and development of coastal areas is carried out in a manner that projects coastal functions and values including natural coastal defences, habitat value/ seascape character. On the basis of information submitted with the application and having regard to the significant excavations required to construct the proposed development, it is considered that the proposed development would be excessively close to the cliff face and the excavations proposed would compromise the structural stability of this area of cliff face. Furthermore having regard to the Waterford Climate Change Adaptation Strategy 2019-2024 and the information submitted with the planning application, the Board is not satisfied that the proposed development would not result in further coastal erosion and/or impacts of climate change. The proposed development would, therefore be contrary to the policy provisions of the Tramore Local Area Plan and the

Waterford County Development Plan and would be contrary to the proper planning and sustainable development of the area.

Emer Doyle
Planning Inspector

23rd May 2022