



An
Bord
Pleanála

Inspector's Report

ABP-312520-22

Development	Construction of a house, garage with effluent treatment system and new entrance from public road with all associated site works.
Location	Moarhaun, Kilnamona, Co Clare.
Planning Authority	Clare County Council
Planning Authority Reg. Ref.	21957
Applicant(s)	Cillian Clancy & Sadhbh Cotter
Type of Application	Permission
Planning Authority Decision	Grant Permission
Type of Appeal	Third Party
Appellant(s)	1. Noel Gavin 2. Anthony Travers
Date of Site Inspection	24 th March 2022
Inspector	Liam Bowe

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1.0 Site Location and Description

1.1. The appeal site with a stated area of 0.302 ha. is located in a rural area approximately 3.2km to the north west of Ennis and 1km to the north west of the N85 national road. The site fronts on to a narrow local road which carries local traffic only. The site is a low-lying greenfield site that comprises the northern part of a small agricultural field. The northern and western boundaries of the site comprise of stone walls with some blackthorn / whitethorn and a number of ash trees. The ash trees appear to be affected by dieback. There is also a mature ash tree within this small field, but this appears to be affected by dieback also. There is a recorded monument CL033-018 "Earthwork" located to the south east of the site. The southern part of the field appears to have been excluded from the site edged red to provide some separation from this monument. The general area is characterised by some sporadic houses, agricultural land and associated buildings.

2.0 Proposed Development

2.1. The proposed development comprises the construction of a house, domestic garage, effluent treatment system, new entrance from the public road and associated site development works at Moarhaun, Kilnamona, County Clare.

2.2. The proposed dwelling is two-storey in design with a ridge height of 8.525m, with render finish and slates on the roof. The proposed dwelling and domestic garage will have areas of 255.98m² and 42.55m², respectively. The existing western and northern site / field boundaries are to be retained. Planting is indicated, although not specified, on the southern site boundary. The southern field boundaries are to be retained, which would effectively form the site boundaries.

3.0 Planning Authority Decision

3.1. Request for Further Information

Prior to its notification of decision, the Planning Authority issued a further information request on 3rd November 2021 requiring details in relation to wastewater disposal, and land registry details. The first party submitted a revised site layout plan

demonstrating wastewater disposal and a letter confirming the transfer of land (Folio CE26381).

3.2. **Decision**

By order dated 14th December 2021 Clare County Council issued a notification of decision to Grant Permission for the proposed development subject to 11 no. standard conditions. The Conditions include inter alia the following:

- Condition No.2: 7 years occupancy condition.

3.3. **Planning Authority Reports**

3.3.1. **Planning Reports**

The initial report of the Planning Officer outlines the relevant planning policy for new single houses in the countryside (CDP3.11), notes the planning history and submissions received. The report raises concerns regarding the disposal of wastewater and land ownership and further information was recommended.

Appropriate Assessment Screening was carried out and concluded that there was no likely potential for significant effects to any Natura 2000 site.

A second report, subsequent to the submission of a response to further information, recommends a grant of permission consistent with the notification of decision which issued.

3.3.2. **Other Technical Reports**

Environment – The Environmental report dated 2nd November 2021 sought details of an area of shrub to be retained and details on an area of ponding on the appeal site.

3.4. **Prescribed Bodies**

None.

3.5. **Third Party Observations**

Submissions on the proposal were received from Anthony Travers and Noel Gavin. The submissions reflect the principal issues raised in this appeal and highlight a recent An Bord Pleanála decision on an application by the same applicant, raise concerns about the suitability of the site, increased traffic, protected species, possible flooding and land ownership.

4.0 **Planning History**

4.1. **Appeal site:**

There is no planning history on the appeal site referenced in the report of the Planning Officer.

4.2. **Relevant appeal:**

PL 03.308829 (P.A. Ref. No.: 20/429): Permission refused for a house and garage for Cillian Clancy on a site located approximately 300m to the north of the appeal site because the proposed development was considered to contravene the overarching provisions of the Sustainable Rural Housing Guidelines and the National Planning Framework.

5.0 **Policy Context**

5.1. **National Planning Framework – Project Ireland 2040 (DoHP&LG 2018)**

5.1.1. The NPF in relation to rural housing includes objective 19 which states –

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; and

- In rural areas elsewhere, facilitate the provision of single housing in the countryside based on 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. Sustainable Rural Housing Development Guidelines 2005

- 5.2.1. The Sustainable Rural Housing Guidelines require planning authorities to differentiate between rural housing demand arising from rural housing need and housing demand arising from proximity to cities and towns. Additionally, development plans should distinguish rural areas under strong urban influence, stronger rural areas, structurally weak rural areas and areas with clustered settlement patterns. The guidelines state that development management policy should be tailored to manage housing demand appropriately within these areas.

5.3. Clare County Development Plan 2017-2023

- 5.3.1. The site is located in a rural area that is designated as experiencing “Strong Urban Pressure” and it is therefore within the “**Areas of Special Control**” as per the Development Plan (Strong Urban Pressure; Map 3B: Areas of Special Control refers).
- 5.3.1. Section 3.2.5 of the Plan deals with Single Housing in the Countryside, and within Areas of Special Control. As such, Development Plan **Objective CDP3.11** – New Single Houses in the Countryside within the ‘Areas of Special Control’ is relevant and states as follows:

It is an objective of the Development Plan:

- a) In the parts of the countryside within the ‘Areas of Special Control’ i.e.:
- Areas under Strong Urban Pressure (See chapter 17);
 - Heritage Landscapes (See Chapter 13);
 - Sites accessed from Scenic Routes (See Chapter 13 and Appendix 5).

To permit a new single house for the permanent occupation of an applicant who falls within one of the Categories A or B or C below and meets the necessary criteria.

- b) To ensure compliance with all relevant legislation as outlined in Objective CDP2.1 and have regard to the County Clare House Design Guide, in particular with respect to siting and boundary treatment.

Category A – Local Rural Person (which includes 3 criteria)

Category B – Persons working full time or part-time in rural areas.

Category C – Exceptional Health and / or family circumstances.

- 5.3.2. Other relevant objectives and sections of the plan include:

Chapter 15.4 Archaeological Heritage

Objective CDP15.8 states that it is an objective of Clare County Council:

- a) To safeguard sites, features and objects of archaeological interest generally;
- b) To secure the preservation (i.e. preservation in situ or in exceptional cases preservation by record) of all archaeological monuments included in the Record of Monuments and Places as established under Section 12 of the National Monuments (Amendment) Act, 1994, and of sites, features and objects of archaeological and historical interest generally (in securing such preservation, the Council will have regard to the advice and recommendations of the Department of the Arts, Heritage, Regional, Rural and Gaeltacht Affairs);
- c) To permit development only where the Planning Authority is satisfied that the proposals will not interfere with:
- items of archaeological or historical importance;
 - the areas in the vicinity of archaeological sites; and
 - the appreciation or the study of such items.

Objectives CDP15.9 and **CDP15.10** are further objectives in relation to the protection and preservation of archaeological sites and Zones of Archaeological Influence.

Appendix 1 – Development Management Guidelines where the following is relevant:

A1.3.1 – Rural Residential

- Development which deals with matters relating to siting and design, road frontage, plot size and wastewater treatment systems.

5.4. **Natural Heritage Designations**

The site is not located within a designated Natura 2000 site. It is noted that the Toonagh Estate SAC is located approximately 2.1km to the north east of the site.

5.5. **EIA Screening**

Having regard to the nature and scale of the proposed development and the separation from sensitive environmental receptors, I am satisfied that no likely significant impacts on the environment arise from the proposed development and that the carrying out of an EIA is not required in this case.

6.0 **The Appeal**

6.1. **Grounds of Appeal**

The following is a summary of the main issues raised in the third party appeals received:

6.1.1. Noel Gavin:

- Contends that the First Party has no demonstrable social or economic reason to live in the area.
- Contends that the First Party's granduncle has family already available to him locally to assist with farming and care.
- Contends that the sightline to the left when exiting the proposed entrance is hampered and will create a traffic hazard.
- Contends that the site experiences flooding.
- Highlights inconsistencies on the application form in relation to the ownership of the site.

- States that it is not clear how Clare County Council's planning officer highlighted a 'divergence' between the Inspector's recommendation and the Board's decision on the previous appeal (PL 03.308829 refers) and contends that it is not clearly set out how their interpretation of the Sustainable Rural Housing Guidelines and National Planning Framework differed from An Bord Pleanála.

6.1.2. Anthony Travers:

- Highlights the recent appeal case (PL 03.308829) where a house for the same applicant was refused permission and contends that the applicant's / First Party's circumstances have not changed.
- Contends that the First Party does not have a legitimate economic and social housing need in the townland of Moorhaun and highlights the voluntary nature of the First Party's involvement in his granduncle's farm.
- Highlights both of the First Party's places of work as being in Milltown Malbay and Limerick.
- Contends that Clare County Council's reasoning for granting permission was based on the fact that the applicant was the owner of the site, which is incorrect.
- Contends that the appeal site was not considered appropriate for development by the First Party's planning consultant under the previous application / appeal for reasons of traffic safety, flooding and proximity to a national monument.
- Highlights Section 3.2.5 of the Clare County Development Plan where it is outlined that one favoured relative may be given consideration for rural housing and contends that this has already been availed of by the landowner.
- Concerned about the impact that the proposed development will have on local nature and references the Lesser Horseshoe Bat.
- Highlights irregularities on the planning application form regarding land ownership, future development on the lands, current place of residence, occupation, and current place of work.

- Concerned about the visual impact that the proposed development would have on the landscape.
- Highlights an alternative site on the family landholding if / when the applicant had an economic or social need to live in the area.
- Contends that, by granting permission for the proposed development, Clare County Council have disregarded and disrespected the expertise of An Bord Pleanála in relation to the applicant's economic need to reside at this location.

6.2. Applicant Response

6.2.1. The main issues raised in the First Party response to the grounds of appeal can be summarised as follows:

- Queries the bona fides of both appellants.
- Contends that the First Party (Cillian Clancy) qualifies under Categories A, B and C of policy criteria outlined in CDP3 of the Development Plan.
- Contends that where Sadhbh Cotter works is irrelevant and that, as she lives with Cillian and his parents in Moarhaun, she meets the standards for rural housing need in the Development Plan.
- States that the site lies outside the OPW flood risk zone and is not prone to flooding.
- Contends that Cillian Clancy is the owner of the farm.
- Contends that previous appeal decision is not relevant as a result of the changed circumstances with Cillian being the landowner and Sadhbh being a co-applicant.
- States that the overruling of the Inspector's Report by the Board on planning ref. no.20/429 was exercised without accountability and without stated reason.

The First Party submitted a separate letter from the Ennis office of the agriculture and food development authority, Teagasc, outlining the details of Cillian Clancy's Agricultural Fetic Level 6 qualification, his application for a herd number and the commencement of the process of his set up with the Department of Agriculture.

6.3. **Planning Authority Response**

The Planning Authority has responded to the grounds of the appeal and confirms that the difference in principle between this application and the previous application by the same applicant on a site to the north is that he is now the 'stated' owner of the site. On this basis, the Planning Authority was satisfied that the proposed development complied with the Sustainable Rural Housing Guidelines. The Planning Authority further outlined the acceptability of the proposed development in terms of wastewater treatment, ecological impact, visual impact and site selection.

7.0 **Assessment**

I consider that the main issues in the assessment of this appeal are as follows:

- Rural Housing Policy
- Traffic safety
- Flooding
- Biodiversity
- Archaeology
- Other Issues
- Appropriate Assessment

7.1. **Rural Housing Policy**

- 7.1.1. I refer to Section 5.3 Development Plan Policy above where Objective CDP3.11 is set out in full. The First Party contends that they comply with the Development Plan policy for rural housing need under Category A – Local Rural Person, Category B – Persons Working Full Time or Part Time in Rural Areas and Category C – Exceptional Health and / or Family Circumstances. Under the previous appeal (PL 03.308829 refers), the Board's decision was unambiguous in relation to the applicant's (Cillian Clancy) lack of a rural housing need as defined under the Sustainable Rural Housing Guidelines and National Planning Framework. Under this current application / appeal, the applicants contend that as Cillian Clancy is now the landowner and farmer of the land and, consequently, the application / appeal

complies with the Development Plan policy for rural housing need and the policies within the Sustainable Rural Housing Guidelines and the National Planning Framework. Similarly, the applicants contend that Sadhbh Cotter complies with this policy as she lives with Cillian and his parents and is wife to Cillian with beneficial interests in the family lands.

- 7.1.2. The site is located in an area identified in the Clare County Development Plan 2017-2023 as an 'Area of Special Control' and an 'Area Under Strong Urban Influence' as identified in the Sustainable Rural Housing Guidelines. In these areas population levels are generally stable within a well-developed town and village structure and in the wider rural areas around them. This stability is supported by a traditionally strong agricultural economic base and the level of individual housing development activity in these areas tends to be relatively low and confined to certain areas.¹
- 7.1.3. The Sustainable Rural Housing Guidelines for Planning Authorities (2005) state that development driven by urban areas should take place within the built-up areas, and that a distinction should be drawn between development that is needed to sustain rural communities and that which tends to take place in the environs of towns, which should more appropriately take place within urban areas.
- 7.1.4. The policies set out in the Sustainable Rural Housing Guidelines have been reinforced in the more recently published National Planning Framework (2018). In areas under strong urban influence, it is the policy to facilitate the provision of single housing in the countryside based on the core consideration of demonstrable economic and social need to live in a rural area, having regard to the viability of small towns and rural settings. Thus, it continues to be necessary to demonstrate a functional economic or social requirement for housing need in these areas.
- 7.1.5. In this regard, information on the file indicates that the First Parties work as a psychiatric nurse (Cillian Clancy) with HSE in Milltown Malbay and a Social Care Worker (Sadhbh Cotter) in Limerick City, respectively. It is also stated that Cillian Clancy is a farmer and farms the land (stated as 40 acres) that the subject site forms part of at Moarhaun. A letter of support from Teagasc has been submitted in response to the appeal outlining details of Cillian's farming qualification / training, his

¹ P.16, Sustainable Rural Housing – Guidelines for Planning Authorities (DoEHLG 2005)

application for a herd number and the commencement of the process of his set up with the Department of Agriculture.

7.1.6. In order to substantiate the First Party's contention that he is farming the land, two letters from the First Party's solicitor are on the file – one in response to the RFI to the planning authority on 19th November 2021 and the other submitted in response to the appeal – confirming that the transfer of land is under way. The First Party has confirmed that Folio No. CE26381 is the relevant parcel of land however, no map of the landholding was submitted with the planning application to Clare County Council or to the Board in response to the appeal. I note that one of the third parties submitted land registry details for this folio number with their appeal, which included a folio map that indicates that this folio number refers to a holding of 9.02 hectares. I consider that the extent of the landholding is not clearly demonstrated such as to comprise a viable farm holding. Furthermore, the transfer of land remains 'under way' and no evidence of completion of this process has been submitted with the application / appeal and, similarly, the process of acquiring a herd number is also not complete.

7.1.7. Therefore, on the basis of the information available, I am not satisfied that the information provided forms a clear basis for compliance with rural housing policy set out in the development plan or forms a basis for a need to live at this rural location. On the basis of the above, I do not consider that the applicants meet the requirements of the Clare County Development Plan relating to rural housing in an area designated as 'Area of Special Control' such as the appeal site. Given the location of the appeal site in an area also designated as an 'Area Under Strong Urban Influence' and the circumstances of the applicants, I also consider that the proposed development would be contrary to the National Planning Framework and the Sustainable Rural Housing guidelines.

7.2. **Traffic safety**

7.2.1. One of the appellants contends that the sightline to the left when exiting the proposed entrance is hampered and will create a traffic hazard. I note that the Site Layout Plan submitted with the application / appeal highlights the availability of 90m

sightlines in both directions from a point 2.4m back from the roadside the proposed entrance, although I do not consider these to be accurately demonstrated.

- 7.2.2. Notwithstanding this, on the day of my site inspection, I noted that the appeal site abuts a straight section of the local road and sightlines are readily achievable subject to some minor amendments to the roadside boundary. Having regard to the limited number of additional vehicular movements arising from a single dwelling and the nature of the proposed site access, I consider that the proposed development would not result in a traffic hazard.

7.3. **Flooding**

- 7.3.1. The appellants contend that the site experiences flooding and that on the previous planning appeal on the site to the north east, the applicant's planning consultant advised that the site under this current appeal was not suitable due to possible flooding issues. In this regard, the First Party states that the site lies outside the OPW flood risk zone and is not prone to flooding.
- 7.3.2. I have reviewed the OPW Flood Maps² and I am satisfied that the appeal site is located outside of the areas designated for possible flooding. I do note the comments from the site assessor and observations from the appellants and, based on these, I consider some local ponding may occur on the site and on the public road during heavy rainfall events. However, I am satisfied that the proposed house or associated wastewater treatment system on the appeal site would not be likely to be affected by flooding or cause displacement of water that would affect other properties.

7.4. **Biodiversity**

- 7.4.1. One of the appellants raises concerns about the impact that the proposed development will have on local nature and references the possible presence of the Lesser Horseshoe Bat in this area and possible impacts on this protected species in the guise of a satellite roost or otherwise.

² <https://www.floodinfo.ie/map/floodmaps/>

- 7.4.2. The Toonagh Estate SAC (Site Code: 002247) is located approximately 2.1km to the north east of the appeal site. The qualifying interest of this Natura 2000 site is the presence of the Lesser Horseshoe Bat. A map is provided with the NPWS Conservation Objectives Report showing the 2.5km foraging range serving the SAC. I have examined this map and I am satisfied that the appeal site is removed from these foraging grounds.
- 7.4.3. There is no direct impact to the Toonagh Estate SAC or loss of habitat. Taken together with the nature, size and scale of the proposed scheme (as amended) I do not consider that the proposed development would have any likely significant effects on this European site or otherwise have significant effects on biodiversity.

7.5. **Archaeology**

- 7.5.1. I note the reference in Clare County Council's planning officer's report identifying the national monument (CL033 - 018 – *Earthwork*) in proximity to the site and stating that no proposed development works encroach on the zone of influence for this recorded monument. As this formed part of the assessment of the planning application by the planning authority, I do not consider this to be a new issue.
- 7.5.2. Accordingly, I have examined the National Monuments Service (NMS) maps for records of monuments and places of archaeological interest. This clearly identifies the aforementioned recorded monument in proximity to the appeal site. Furthermore, I consider that the statutorily protected archaeological zone of influence extends into the appeal site and into an area of the appeal site where development works are proposed. This archaeological zone of influence is clearly presented on the NMS's digitised map and, more particularly, the archaeological zone of influence on the original maps of the records of monuments and places³ extends over almost the entire appeal site (I have attached a copy of both maps to this planning report).
- 7.5.3. Clare County Council's policy in this regard is outlined in Section 5.3 above and objectives for the protection and preservation of the archaeological heritage of the county are clearly enunciated under Objectives CDP15.8, CDP15.9 and CDP15.10. Consequently, in the absence of an archaeological impact assessment with the application / appeal, I consider that it cannot be concluded that the proposed

³ www.archaeology.ie , NM/RMP Map 23

development would not have an adverse impact on the archaeological heritage of the area and the proposed development would be contrary to these objectives.

7.6. Other Issues

7.6.1. Visual Impact

7.6.2. As stated earlier in this report, the proposed development comprises the construction of a two-storey house with a ridge height of 8.525m, with render finish and slates on the roof. The existing western and northern site / field boundaries are to be retained. The southern field boundaries are also to be retained.

7.6.3. On the day of my site inspection, I observed a mix of house types and designs in the wider rural area around the appeal site. I consider that the proposed house design, which is traditional in form and design, would not form an incongruous feature on this rural landscape and, with the retention of the field boundaries, should sit comfortably on the appeal site. I, therefore, am satisfied that the proposed house would not have any significant adverse visual impact on this rural landscape.

7.6.4. Ground water

Objective CDP8.27 in the Clare County Development Plan states that it an objective 'to permit the development of single dwelling houses only where it is demonstrated to the satisfaction of the Planning Authority that the proposed wastewater treatment system is in accordance with the 'EPA Code of Practice Wastewater Treatment and Disposal Systems Serving Single Houses (2009)'.

Under the Code of Practice, the trial hole should be excavated to a depth of at least 1.2m below the invert of the lowest percolation trench (or 2m for GWPRs of R2² or higher)⁴. The new Code requires a trial hole depth of at least 2.1m or to bedrock (or 3m for GWPRs of R2² or higher). I note the results within the Site Characterisation Report stating the groundwater protection response to be R2⁴ and the trial hole dug to a depth of 2.5m with no water table present.

The First Party proposes to treat the wastewater by means of a secondary treatment system in the form of a mechanical aeration system and discharge to a polishing

⁴ The new Code applies to site assessments and installations carried out after 7th June 2021 (see preface to the Code).

filter. I also note the reports of the Assistant Scientist, Clare County Council and the conformity of the proposals under the 2021 Code of Practice.

On the day of my site inspection, I noted that the ground conditions were good and, in my opinion, consistent with those described within the Site Characterisation Form. I conclude, based on the material submitted with the application, that the appeal site is suitable for the safe disposal of domestic effluent and with the installation of a proprietary wastewater treatment system, that the proposed development would not create a serious risk of ground water pollution.

7.6.5. Development Contributions

I refer to the Clare County Council Development Contribution Scheme 2017-2023. It is recommended that, should the Board be minded to grant permission, a suitably worded condition be attached requiring the payment of a Section 48 Development Contribution in accordance with the Planning and Development Act 2000.

7.6.6. Land ownership

The appellant contends that the applicant does not have legal interest in the appeal site, however clear information is presented that the First Party has sufficient legal interest for the purposes of the planning application and decision. In any case, this is a matter to be resolved between the relevant parties, the applicant and the local authority in this instance, having regard to the provisions of S.34(13) of the 2000 Planning and Development Act.

7.7. **Appropriate Assessment**

- 7.7.1. Having regard to the nature and scale of the development proposed and the absence of any direct or indirect pathway between the appeal site and any European site and the separation distances to the nearest European site (Toonagh Estate SAC is located approximately 2.1km to the north east of the 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

I recommend that permission be refused for the reasons stated below.

9.0 Reasons and Considerations

1. Having regard to:

- The location of the site within a rural area identified as being an area under strong urban influence in accordance with the Sustainable Rural Housing Guidelines for Planning Authorities published by the Department of the Environment, Heritage and Local Government 2005 and an 'Area of Special Control' under the Clare County Development Plan 2017-2023,
- National Policy Objective 19 of the National Planning Framework (February 2018) which seeks to 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, having regard to the viability of smaller towns and rural settlements,
- The provisions of the Clare County Development Plan 2017-2023 and specifically Objective CDP3.11, which facilitates the provision of rural housing for local rural people building in their local rural area, and
- The applicants' places of employment in Milltown Malbay and Limerick City, and the absence of documentary evidence on the file outlining the applicants' need to live in this rural area,

the Board could not be satisfied on the basis of the information on the file that the applicants come within the scope of either economic or social housing need criteria as set out in the overarching National Guidelines or the definition of a local rural person in accordance with the relevant criteria of the development plan.

The proposed development, in the absence of any identified locally based need for a house at this location, would result in a haphazard and unsustainable form of development in an unserved area, would contribute to the encroachment of

random rural development in the area and would militate against the preservation of the rural environment and the efficient provision of public services and infrastructure and undermine the settlement strategy set out in the development plan. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.

2. It is policy of the planning authority outlined in the Clare County Development Plan 2017-2023 under policy Objectives CDP15.8, CDP 15.9 and CDP15.10 to protect and preserve all archaeological monuments included in the Record of Monuments and Places as established under Section 12 of the National Monuments (Amendment) Act, 1994, and of sites, features and objects of archaeological and historical interest generally. It is considered that the proposed development by reason of its proximity to a historic monument which stands registered, or which is situated in an archaeological area so registered and in advance of an archaeological assessment has the potential to injure or interfere with a historic monument, would be premature and would, therefore, be contrary to the proper planning and sustainable development of the area.

Liam Bowe
Planning Inspector

25th April 2022