



An
Bord
Pleanála

Inspector's Report ABP-315079-22

Development	Demolition of derelict house and outbuilding, removal of existing sub-structure house and construction of 4 detached two-storey houses with effluent treatment systems and all associated site works.
Location	Wilsons Creek Housing Development, Rossylongan, Donegal Town, Co. Donegal
Planning Authority	Donegal County Council
Planning Authority Reg. Ref.	2251455
Applicant(s)	Felix Gillespie
Type of Application	Permission.
Planning Authority Decision	To grant.
Type of Appeal	Third Party
Appellant(s)	Wilsons Creek Residents Association
Observer(s)	None.
Date of Site Inspection	11 th April 2023.
Inspector	Deirdre MacGabhann

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1.0 Site Location and Description

- 1.1. The 0.402ha appeal site is situated c.2km to the south west of Donegal Town in the townland of Rossylongan, County Donegal. It lies in a residential area to the south of the N56.
- 1.2. The appeal site comprises lands immediately south of Wilson's Creek, a small residential estate of two storey dwellings that surround a central open space. The site falls gently towards the south. It contains an existing derelict house, associated outbuilding and the sub-structure for a dwelling house. Soil/hardcore is in mounds within and alongside part of the southern and eastern boundaries of the site. A drainage ditch runs along the southern boundary of the site. It connects to a pipe which discharges to a ditch at the southeaster corner of the site and this ditch drains towards Donegal Bay. At the time of site inspection, there was a smell of foul water in the area of the site and it appeared that foul water was ponding in a small area on the site and to the south of it (photographs 6 and 7).
- 1.3. Access to the site is from the county road via a gated entrance. It is separated from the Wilson's Creek development by a footpath and a mix of timber and metal fencing (photographs 2 and 4).

2.0 Proposed Development

- 2.1. The proposed development comprises:
 - The demolition of the existing derelict house and associated outbuilding.
 - The removal of the existing sub-structure of a dwelling house approved under previous permissions, PA ref. 13/51104 and PA ref. 14/50934.
 - The construction of 4 no. detached dwellings with effluent treatment systems. Houses are arranged to face the internal access road, with individual access from the estate road (floor area of dwellings is 155.28sqm, FF is 14m).
 - Associated site works.
- 2.2. The planning application includes a Site Suitability Assessment Report for an On-site Wastewater Treatment System.

3.0 Planning Authority Decision

3.1. Decision

3.1.1. On the 20th October 2022, the PA decided to grant permission for the development subject to 16 no. conditions. Most of these are standard. Site specific conditions include:

- C2 – Dwellings to be used as permanent homes.
- C3 – Omission of first floor window in north eastern elevation of House No. 4.
- C15 – Sets out requirements in respect of wastewater treatment system for each of the 4 dwellings.

3.2. Planning Authority Reports

3.2.1. Planning Reports

- Planning (6th October 2022) – Refers to the location of the development, internal and external reports (none received but previous Area Roads Engineer report referred to - see below), third party submission, planning history of the site and policy context. It assesses the merits of the development under a number of headings. Under principle, it refers to the long and complex planning history of the site, its location and zoning and concludes that the development is consistent with a scheme of 4 no. dwellings that was agreed as appropriate on the site (under PA ref. 21/51685, withdrawn) subject to compliance with all other relevant development management criteria, guidelines and technical standards. The design and siting of the dwellings are considered to be acceptable subject to omission of first floor bedroom windows on the eastern elevation of house no. 4 (potential for overlooking). No impacts on residential amenity are considered to arise and arrangements for vehicular access are acceptable. The report refers to the results of the T-test (64.37 min/25mm) and considers that the soils on site are suitable for the treatment of effluent. It is also considered, in the context of the planning history of the site and attempts to address wastewater treatment for the existing dwellings, that the proposed means of disposal

within individual systems is the only currently available means to permit future development on the zoned lands. Arrangements for surface water drainage (connect to existing system) and water supply (new connection to public mains) are deemed acceptable. The report refers to the AA Screening report, below, and its conclusion that AA is not required. A development charge is calculated. EIA is considered not to be required due to the limited scale of the development and location of the site. The report recommends granting permission.

- Screening for AA Report (6th October 2022) – Having regard to the brownfield nature of the site, within an urban area, the fact that the development would not result in any direct loss or fragmentation of habitat from European sites, the report considers that the development would not have a significant effect on Donegal Bay (Murvagh) SAC or on Donegal Bay SPA. The need for AA is therefore screened out.
- Exemption Certificate in respect of Part V.

3.2.2. Other Technical Reports

- None submitted but Planning Report refers to Area Roads Engineer Report submitted on the previous application. It recommends FI in respect of the (a) location of the existing storm sewer, the size of the sewer and its capacity to take additional discharge and the location of the outfall of the sewer, and (b) location of existing public lighting and proposals for public lighting.

3.3. Prescribed Bodies

- No submissions.

3.4. Third Party Observations

3.4.1. On file is one observation made by Wilsons Creek Residents Association. It sets out concerns in respect of:

- Excessive number of units, overdevelopment, out of scale and character with existing properties, visual impact on overall estate.
- Inappropriate inclusion of open space area in red line boundary.

- Inappropriate to install a new sewerage treatment system when the current one could be overhauled to accommodate 3 further units.
- Issues with performance of existing wastewater treatment system. System cannot be certified. No percolation area can be identified and foul effluent may be leaking to adjoining lands. A new system should be provided and an enforcement notice served in respect of the existing system.
- Dangerous location of water mains and electricity laid close to each other. Donegal CC previously decided not to take the development into charge until this was resolved.

4.0 Planning History

4.1. The planning history of the site is set out in the Planning Report. Of note it refers to:

- Under PA ref. 00/152 – Permission for the demolition of the single storey farm house on the site and construction of 14 no. two storey detached dwellings (extended in duration under PA ref. 05/652) (Wilson's Creek development). the application site included the appeal site. Eleven of the 14 no. dwellings appear to have been constructed.
- PA ref. 06/21131 – Permission granted for alterations to the development previously granted under PA ref. 00/152, to include four detached properties, with three no. situated on the appeal site. Change of house type subsequently granted under PA ref. 07/20392 in respect of these four properties.
- PA ref. 12/20103 – Permission refused for six no. semi-detached dwellings on the appeal site.
- PA ref. 13/51104 - Permission granted for completion of estate road and services and for the construction of one detached house on the eastern side of the appeal site. Alterations to dwelling granted permission under PA ref. 14/50934.
- PA ref. 21/51685 – Application withdrawn for the demolition of existing derelict dwelling and associated outbuilding, removal of existing sub structure

and erection of 5 no. detached dwellings on the appeal site, with connection to existing foul wastewater treatment system and storm drainage system approved under PA ref. 00/152.

5.0 Policy Context

5.1. National

- National Planning Framework 2018. Under National Policy Objective 11 the NPF sets out a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.

5.2. Donegal County Development Plan 2018 – 2024 (as varied).

5.2.1. The appeal site falls within the administrative area of Donegal County Development Plan 2018-2024 (as varied) and within the area covered by the Seven Strategic Towns (Donegal Town) Local Area Plan 2018-2024 (as varied). The following policies apply:

- In Chapter 2 of the Plan, Core Strategy, Donegal Town is designated as a Layer 2A Strategic Town. Policy objective CS-O-5 supports the growth of these towns. Policy objectives in respect of urban housing direct development in line with settlements strategy set out in the Core Strategy, with development delivered in a sequential manner (UB-O-1 and UB-O-2, CDP).
- Policies UB-P-6 encourages and supports proposals for new residential development that will result in the regeneration of areas of vacancy or dereliction, subject to all other relevant policies of the plan, environmental safeguards. Policy UB-P-7 (CDP) requires residential development to comply with relevant Government guidelines.
- Policies UB-P-11 and 12 require residential development to provide a mix of house types and sizes and to provide a design concept that ensures reasonable levels of residential amenity.

- The appeal site falls within an area of High Scenic Amenity and policy NH-P-7 of the CDP applies. It facilitates development that integrates within and reflects the character and amenity designation of the landscape.
- NH-P-1 affords protection to sites of natural heritage interest including national and European sites.
- The appeal site is situated on land zoned 'Established Development' in the LAP. The zoning objective is to conserve and enhance the quality and character of the area, protect residential amenity and allow development appropriate to sustainable growth of the settlement. Within such areas proposals for development will be considered where they can be integrated effectively with the surrounding area (Policy GEN-EH-6, LAP).

5.3. Natural Heritage Designations

5.3.1. The appeal site lies c.155m (PA report refers to 206m) to the north west of Murvagh Bay which is subject to the following designations:

- Donegal Bay (Murvagh), proposed Natural Heritage Area and Special Area of Conservation (shared site code 000133), and
- Donegal Bay Special Protection Area (site code 004151).

5.4. EIA Screening

5.4.1. Having regard to the nature and scale of the proposed development it is considered that the issues arising from the proximity to European Sites can be adequately dealt with under the Habitats Directive¹ (Appropriate Assessment) as there is no likelihood of other significant effects on the environment. The need for environmental impact assessment can, therefore, be excluded at preliminary examination and a screening determination is not required.

¹ Boundary of the SAC and pNHA overlap in the area of the site and, with shared site code, conservation interests are common to both designations.

6.0 The Appeal

6.1. Grounds of Appeal

6.1.1. The third party appeal is made by Wilsons Creek Residents Association. Grounds are:

- The development is in breach of conditions attached to a series of planning decisions issued for the site previously which required the provision of communal services including wastewater treatment. No evidence of consultation with residents association. Previous permissions and conditions are not outside the remit of the application, as it relies on the principle of development established previously.
- Site suitability assessment does not demonstrate compliance with the objectives of the development plan. Single site suitability assessment submitted for house no. 1, no indication of where trial holes were located, site assessment carried out in drought conditions despite proximity to Natura 2000 sites.
- Applicant does not demonstrate how the development will not adversely affect the adjacent SAC and SPA. No screening report submitted, drainage ditch running immediately downhill from the south east of the site feeds directly to SAC and SPA (aerial photograph attached).
- A number of procedural irregularities had a material effect on the outcome of the planning process. No record of communication between applicant and PA on the issue of waste water treatment, residents association open to finding solutions to wastewater treatment under PA 21/51685 (see attachments to appeal), inadequate assessment of likely effects on European sites (including being referred out to statutory bodies, AA carried out by PA not a suitably qualified person, reference to old data and absence of acknowledgement of hydrological link). No request for FI on capacity of surface water system as per Engineer's report.
- Applicant does not demonstrate why there should be a change in the permitted density allowing 4 no. houses instead of 3 no. on the site.

- Design is out of character with existing (existing houses have hipped roof, proposed have a gable ended roof).
- On-going issues with wastewater treatment system for the existing development for >10 years. Distressing and public health issue, with raw sewage leaking onto adjoining land (see letter from landowner attached to appeal). PA have duty to enforce compliance with previously granted permissions. Residents are eager to have site development, consistent with proper planning and development principles.

6.2. Applicant Response

6.2.1. The applicant makes the following response to the appeal:

- Breaches of conditions attached to previous decisions. Applicant bought the site in November 2020 and is not an assign of the original developer or responsible for the maintenance of the existing WWTS. Under PA ref. 22/51455 connection was proposed to the existing WWTS and he was prepared to upgrade it. PA required residents to enter into a 5 year maintenance contract. This could not be agreed and applicant withdrew the planning application.
- Site Suitability assessment. Site suitability assessment was submitted for each site.
- Impact on SAC/SPA. Surface water drainage would connect to the existing system on site. Drain referred to by appellant is overgrown (see photographs). PA carried out screening exercise. Appellant attaches an observation that was submitted under PA ref. 21/51685 and not the permission being appealed.
- Procedural irregularities. There were communications between the applicant and the PA, but no formal pre-planning meeting. Road Engineer Report was made under PA ref. 21/51685. Applicant engaged with the residents in a meaningful way. Agreement could not be reached, hence single WWTS proposed for each dwelling.
- Density. Under PA ref. 21/51685 a density of 4 no. dwellings was agreed, subject to compliance with technical standards.

- Design. House design differs from existing. Design is contemporary. House no. 4 has a hipped roof to integrate with existing. House no. 1 has similar hipped roof and acts a bookend to development. Development finish is high quality.

6.3. Planning Authority Response

6.3.1. The PA make the following response to the appeal (2nd December 2022):

- Breaches of conditions attached to previous decisions. Notes that previous permissions included the subject site but that no development has taken place. A recent application failed to establish a management company for the entire site. PA had no reason to dispute applicant's assertion that this was unsuccessful. The site and red line boundary were dealt with as an application site and assessed in line with policies of the CDP.
- Site suitability assessment. Is considered adequate with regard to testing of soil conditions and photographic record of test holes. The alternative of connecting to the existing malfunctioning system or installation of a communal system are not sustainable or viable options.
- Impact on SAC/SPA. Surface water from system will not discharge to any stream. PA Screening Report concluded that the development would not impact on European sites. EPA Hydrological mapping does not indicate any hydrological link between site and Donegal Bay.
- Procedural irregularities. It is usual and accepted practice that there is discussion between the two parties on most planning applications. Board could request a screening statement. Surface water comments were made by Engineer in respect of previous application and discussed between parties.
- Density. Increase considered appropriate and a sustainable use of vacant land.
- Design. Design of dwellings differ from existing but are contemporary, respond to climate adaption and are consistent with policies of the CDP (UB-P-11 and -12).

6.4. Observations

- None.

6.5. Further Responses

6.5.1. The appeal was circulated to The Heritage Council, Development Applications Unit and An Taisce on the 21st December 2022. No response were received.

7.0 Assessment

7.1. Having regard to the policy context for the development and the submission on file, I consider that the key issues for this appeal are:

- Planning history.
- Treatment of wastewater and surface water.
- Impact on European sites (addressed under Appropriate Assessment).
- Density and design.

7.1.1. In addition, the appellant refers to the following procedural matters which I address briefly below:

- Communication – It is not unusual, or irregular, for there to be informal communication between a potential applicant and the PA. Any application is subject to statutory public notices and requires to be addressed on its merits.
- Approach of residents – It is evident in the appeal that the resident's association is open to finding solutions to wastewater treatment under PA 21/51685. However, this is a matter which lies outside of the scope of this appeal as it relates to a permitted development and outside of the redline boundary of the appeal site.

7.2. Planning History

7.2.1. From the information on file it is evident that the appeal site originally formed part of a larger residential development granted under PA ref. 00/152. Further, it is evident that the development, as originally proposed, remains unfinished in respect of the subject site and that there are issues in respect of the treatment of wastewater from

the developed estate. Notwithstanding the foregoing, the applicant is not obliged to implement the initial permission (as amended) and is entitled to bring forward alternative proposals for the subject site, for consideration in the context of current planning policies. Issues in respect of the existing wastewater treatment plant are a matter for the planning authority.

7.3. Treatment of wastewater and surface water.

7.3.1. The applicant proposes treating foul water arising on the appeal site by individual wastewater treatment systems. On file is a single site assessment. It is stated that four assessments were carried out and submitted to the PA but not uploaded to the planning portal. The Planning Report and PA response to the appeal refer to a single report. If the Board are minded to grant permission for the development, these additional reports should be sought from the PA. Notwithstanding this:

- It is stated in the Site Characterisation Form that the appeal site lies above a Locally Important aquifer, with high vulnerability and within a Groundwater Protection Scheme. Groundwater protection response is R1, location of wastewater treatment system is acceptable subject to normal good practice. This is consistent with Table E1, Response Matrix for DWWTs set out in the EPA Code of Practice, Domestic Waste Water Treatment Systems (2021).
- The On-Site Assessment (section 3.0) of the Site Characterisation Form describes the ground conditions on site, with the site predominantly firm underfoot and consisting of mainly coarse vegetation and hardcore fill. It refers the imperative requirement to remove surface water from the site beyond any percolation facility. It acknowledges the restrictive nature of the site but states that minimum separating distances, as per the EPAs Code of Practice, can be achieved.
- Table 6.2 of the EPAs Code of Practice sets out minimum separation distances for DWWTs. These include that the location of the DWWT (periphery of tank/plant and infiltration/treatment area) is stated to be 10m from any open drain or drainage ditch and the location of any tank/plant >7m from any on-site or neighbouring dwelling house.

- From my inspection of the site, there is a drainage ditch that runs along its southern boundary. This is referred to in section 3.0 of the Site Characterisation Form. However, the Site Layout drawing clearly shows the proposed percolation area within 5m of this drainage ditch. Effluent treatment plants would also appear to be <7m from house nos. 1-3. Proposed separation distances appear therefore to be sub-standard for all proposed units.
- The Site Characterisation Form recognises the trial hole and percolation tests were carried out in a dry period. T test result (deep soil percolation) was 64.37min/25 mm and P test (shallow soil percolation) result was 56.00 min/25mm. As per the EPAs Code of Practice, the soils on site, are stated to be suitable for a packaged wastewater treatment system and polishing filter (see section 4.0 of Characterisation Form and Table 6.4 of CoP). The trial holes indicate a band of clay soils. These are referred to in the Site Assessment and it is stated that any such material should be removed under the polishing filter (section 3.2 of Assessment).

7.3.2. Whilst the site assessment indicates that the soils on site are suitable for accommodating discharge from a packaged wastewater treatment system and polishing filter, I am concerned that:

- a. There is no information on file regarding where the site assessment was carried out,
- b. As stated, there is no information on file regarding the assessment of the ground conditions at each proposed DWWTS,
- c. As stated, minimum separation distances do not appear to be achieved, and
- d. As stated at the time of site inspection there was a smell of foul water in the area of the site and it would appear that foul water was ponding on site, immediately south of the access road and along part of the southern boundary.

7.3.3. Having regard to the foregoing, I would be concerned that the applicant has not adequately demonstrated how foul water will be treated on site to meet the requirements of the EPA's Code of Practice. Further, it is evident that inadequacies

of the wastewater treatment system for Wilson's Creek Housing Development may be impacting on the subject site and that this issue has not been addressed by the applicant, with the potential for foul water to drain towards/onto or even through the appeal site. I am not satisfied therefore that the applicant has not adequately demonstrated that the site can accommodate the proposed DWWT systems of therefore to be drained.

- 7.3.4. The applicant proposes connecting the appeal site to the existing surface water management system. Under PA ref. PA ref. 21/51685, which was withdrawn, it is stated in the Planning Report (for the subject development) that the Area Engineer recommended FI on the location of the existing storm sewer, the size of the sewer and its capacity to take additional discharge. This matter has not been raised in respect of the proposed development, but given that the proposed development relies on the existing infrastructure for surface water drainage, this request is not unreasonable. Further, any issues with the treatment of surface water also have capacity to influence the drainage characteristics of the appeal site and therefore the operation of any proposed wastewater treatment system(s). I consider that the matter should, therefore, be addressed in advance of any permission.

7.4. Density and Design

- 7.4.1. The appeal site is situated within the settlement boundary of Donegal Town a Layer 2A Strategic Town, to which urban housing development is directed. The site itself is a derelict site and is zoned 'Established Development' with policies supporting the regeneration of derelict sites and development in Established Development areas which conserve and enhance the quality and character of the area and protect residential amenity.
- 7.4.2. The proposed residential development is consistent with existing land uses and the Wilsons Creek housing development in particular. The development would result in the regeneration of a derelict site and improve the visual amenity of the area.
- 7.4.3. Previous planning permissions have limited residential development on the appeal site to three properties. The proposed development provides four units and whilst these are situated on much smaller sites than the existing development, I do not consider the increase in number of units to be inappropriate or detract from the

amenity of existing (or proposed) properties. In coming to this conclusion I am mindful of the distance of the proposed dwellings from existing and their orientation which does not give rise to significant overlooking or overshadowing (subject to omission of bedroom windows in the northern elevation of house no. 4, as per condition no. 3 of the PAs grant of permission).

- 7.4.4. Design of the proposed dwellings is contemporary and high quality. Further, whilst design, including roof profiles, is not consistent with that of existing dwellings it is not inappropriate or likely to detract from the amenity of the area.

8.0 Appropriate Assessment – Screening

- 8.1. The requirements of Article 6(3) as related to screening the need for appropriate assessment of a project under part XAB, section 177U of the Planning and Development Act 2000 (as amended) are considered fully in this section.
- 8.2. A screening report for Appropriate Assessment was not submitted with this application/ appeal case. Therefore, this screening assessment has been carried *de-novo*.
- 8.3. Test of Likely Significant Effects. The project is not directly connected with or necessary to the management of a European Site and therefore it needs to be determined if the development is likely to have significant effects on a European site(s).
- 8.4. Description of the Project. The proposed development comprises the construction of four dwellings, with connection to the existing surface water management system. Foul water will be directed to four individual DWWTS. The appeal site lies c.150m west and uphill of Donegal Bay (Murvagh) SAC and Donegal Bay SPA. The surface watercourse that runs along the southern boundary of the site connects, via an underground pipe at the southeastern corner of the site, to a drainage ditch which discharges towards Donegal Bay. The applicant states that this drain is overgrown. Whilst photographs of the site indicate vegetation in/alongside the drain, it is evident from inspection that the water from the southern and northern boundary of the site is directed to this ditch, via an underground pipe from the south east corner of the appeal site to this ditch, with evidence of waterflow in the ditch. There is potential therefore for contaminated effluent from the appeal site, for example arising during

construction (increased sediment load) or operation (wastewater discharges to ground) to make its way over or underground to the SAC/SPA, with the potential for adverse effects on water quality and water quality dependent habitats and species. Given the location of the site in an existing urban area, the potential for disturbance effects is not likely.

8.5. Submissions and observations. The appellants argue that the applicant does not demonstrate how the development will not adversely affect the adjacent SAC and SPA. It states that no screening report submitted and that a drainage ditch running immediately downhill from the south east of the site feeds directly to SAC and SPA.

8.6. European sites. Conservation interests Donegal Bay (Murvagh) SAC and Donegal Bay SPA are:

European site (code)	Qualifying Interests
Donegal Bay (Murvagh) SAC (000133)	Mudflats and sandflats not covered by seawater at low tide [1140] Fixed coastal dunes with herbaceous vegetation (grey dunes) [2130] Dunes with <i>Salix repens</i> ssp. <i>argentea</i> (<i>Salicion arenariae</i>) [2170] Humid dune slacks [2190] <i>Phoca vitulina</i> (Harbour Seal) [1365]
Donegal Bay SPA (004151)	Great Northern Diver (<i>Gavia immer</i>) [A003] Light-bellied Brent Goose (<i>Branta bernicla hrota</i>) [A046] Common Scoter (<i>Melanitta nigra</i>) [A065] Sanderling (<i>Calidris alba</i>) [A144] Wetland and Waterbirds [A999]

8.7. In the absence of mitigation measures, it is possible that construction work could give rise to increased sediment load on the drainage ditch that runs along the south of the site. This drainage ditch appears to discharge towards or to the designated SAC/SPA. Over the 150m between the site and Donegal Bay sediment is likely to be diluted and to settle out. However, there is a risk of effects that cannot be excluded by way of preliminary examination or in the absence of mitigation.

8.8. In the planning assessment of this report I have concluded that the applicant's arrangements for the disposal of foul and surface water are inadequate to demonstrate that the site can be drained, with the potential for deleterious effects on ground and surface water. Whilst the site is removed from Donegal Bay and again dilution, settlement and dissipation effects are likely to apply, in the absence of further information there is a risk of deleterious effects to water quality and a risk of downstream effects on water quality in the European sites.

8.9. Screening Determination

8.9.1. On the basis of the information provided with the application and appeal and in the absence of further information in respect of the arrangements for the arrangements for the disposal of surface and foul water and in the absence of a Natura Impact Statement (which refers to mitigation measures during construction), the Board cannot be satisfied that the proposed development individually, or in combination with other plans or projects would not be likely to have a significant effect on European site Nos. 000133 and 004151, or any other European site, in view of the site's Conservation Objectives. In such circumstances the Board is precluded from granting permission.

9.0 Recommendation

9.1. I recommend that permission for the development be refused.

10.0 Reasons and Considerations

1. Having regard to the confined nature of the site, the proposed location of domestic wastewater treatment systems and absence of information on the arrangements for drainage of surface water and foul water in the wider area, the Board is not satisfied that the arrangements for the disposal of effluent are satisfactory or that the applicant has demonstrated that the site can be adequately drained. The proposed development would therefore be prejudicial to public health.

2. On the basis of the information provided with the application and appeal and in the absence of further information in respect of the arrangements for the arrangements for the disposal of surface and foul water and of a Natura Impact Statement (which refers to mitigation measures during construction), the Board cannot be satisfied that the proposed development individually, or in combination with other plans or projects would not be likely to have a significant effect on European site Nos. 000133 and 004151, or any other European site, in view of the site's Conservation Objectives. In such circumstances the Board is precluded from granting permission.

I confirm that this report represents my professional planning assessment, judgement and opinion on the matter assigned to me and that no person has influenced or sought to influence, directly or indirectly, the exercise of my professional judgement in an improper or inappropriate way.

Deirdre MacGabhann
Planning Inspector

27th April 2023