



An
Bord
Pleanála

Inspector's Report

ABP-317716-23

Development	Construction of 6 no. single storey "farmhouse" apartment units, caretaker lodge, and associated site works
Location	Ballymackean, Old Head, Kinsale, Co. Cork
Planning Authority	Cork County Council
Planning Authority Reg. Ref.	225778
Applicant(s)	Ashbourne Holdings Limited
Type of Application	Permission
Planning Authority Decision	Grant
Type of Appeal	Third Party
Appellant(s)	Manjana Strey and Holger Diepes Maurice Fitzgerald Alan Fitzgerald Brian Downing
Observer(s)	Marie Brennan Mark Mulligan

Niamh Buckley

Date of Site Inspection

March 27th, 2024

May 29th, 2024

Inspector

Lorraine Dockery

1.0 Site Location and Description

- 1.1. The site, which has a stated area of 6.73 hectares, is located within the townland of Ballymackean on the Old Head of Kinsale, approximately 13km south of Kinsale, Co. Cork. The site currently contains a single storey dwelling and a number of associated, unused buildings (two of which are stated to be heritage dwellings), all set back a significant distance from the local road and partially screened by planting. The property appears vacant at the present time.
- 1.2. The site is located within a scenic, rural area, and a number of individual residential properties are noted in the surrounding area. The Old Head Golf Links and its associated facilities are located approximately 2km to the south-west of the application site.

2.0 Proposed Development

- 2.1. The proposed development comprises the demolition of existing structures on site and permission for the construction of six residential holiday units (4 dwellings; 2 apartments), a caretaker's lodge; upgrade and widening of existing entrance; 16 car parking spaces, together with all ancillary site development works to include a pumphouse, wastewater treatment system and associated polishing filter and underground water tanks.
- 2.2. The stated floor area of the proposed holiday lets units are all in excess of 200m² while the proposed caretaker's cottage has a stated floor area of approximately 80m². These units will be of 5* standard, full serviced residences, each accommodating four no. guest suites. The stated purpose of the proposed development is to better reflect the 5-star golf experience provided at Old Head of Kinsale Golf Course and will underpin their position as Ireland's leading golf links.

3.0 Planning Authority Decision

3.1. Decision

Permission GRANTED, subject to 30 no. conditions

Further Information was requested by the planning authority in relation to (i) ecology (ii) built heritage and (iii) site layout.

Condition 2 restricts the use of the development for short-term letting directly associated with the golf and related activities at the Old Head of Kinsale Golf Links while Condition No. 3 restricts the occupation of the Caretaker's Lodge to the place of residence of the caretaker employed to manage the overall complex and/or members of their immediate family only (no short-term letting). Condition No.4 relates to the developer entering into legal agreement with regards to same.

3.2. Planning Authority Reports

3.2.1. Planning Reports

- Case Planner- Reflects decision of planning authority; recommends grant of permission

3.2.2. Other Technical Reports

Environment Section- No objection, subject to conditions (12/09/2022)

Environment Section- Conditions recommended (07/07/2023)

Area Engineer Section- Recommends permission (19/09/2022)

Archaeologist Section- Conditions recommended in the event of permission being granted (06/07/2023)

Public Lighting- No objection, subject to conditions (22/08/2022)(20/06/2023)

Ecology Section- No objection, subject to conditions (06/07/2023)

3.3. Prescribed Bodies

Inland Fisheries Ireland: No objections

3.4. Third Party Observations

The planning authority received a number of observations which raised issues similar to those contained in the third-party appeals.

4.0 Planning History

No recent relevant history on this site.

The following is noted:

19/05572- Permission GRANTED for a clubhouse extension to provide a refit of the existing 15 suites and provide an additional 5 suites and associated site works.

5.0 Policy Context

5.1. National Planning Policy

Section 28 Ministerial Guidelines

The following list of section 28 Ministerial Guidelines are considered to be of relevance to the proposed development. Specific policies and objectives are referenced within the assessment where appropriate.

- Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities
- Urban Development and Building Heights, Guidelines for Planning Authorities
- Design Manual for Urban Roads and Streets
- The Planning System and Flood Risk Management (including the associated Technical Appendices)
- Architectural Heritage Protection, Guidelines for Planning Authorities
- Appropriate Assessment Guidelines for Planning Authorities
- Climate Action Plan

Other policy documents of note:

- National Planning Framework
- Regional Spatial & Economic Strategy for the Southern Region
- EPA Wastewater Treatment Manuals Treatment Systems for Small Communities, Business, Leisure Centre and Hotels
- EIA Guidance for Consent Authorities regarding Sub-Threshold Development

Local Planning Policy

Development Plan

The Cork County Development Plan 2022-2028 applies.

Site located within a High Value Landscape Area

Figure 8 demonstrates that site is located within a 'Rural Area under Strong Urban Influence'

The local road to the west is designated as a Scenic Route (S66) while Route S67 on the western side of the headland (approximately 450m from the application site).

Section 10.15 Tourism Developments and Facilities

Objective TO 10-10: Tourism Facilities

- a) Encourage tourism related facilities, including accommodation and other developments within existing settlements subject to normal site suitability considerations where they can best support compact growth and the regeneration of settlements, the provision of services and the general economic vitality of the settlement.
- b) Carefully consider tourism - related developments outside settlements at an appropriate scale and balance having regard to the pertaining environmental conditions and sensitivities, scenic amenity, availability of services and the cumulative impact of such developments on the environment.
- c) Support sustainable environmentally sensitive small-scale tourism enterprises including Agri-tourism enterprises and other initiatives that are developed in conjunction with established rural activities such as, fishing, walking, cycling, mountain biking, surfing, equestrian sports and other activities where these are compatible with environmental legislation. A limited amount of tourist accommodation could be included in association with such enterprises subject generally to the renovation of existing structures or redundant agricultural farm buildings as well as limited new buildings on an appropriate scale (new structures will have regard to the policies of Chapter 5 Rural).

- d) Encourage and facilitate the delivery of suitably scaled tourism related retail developments and initiatives in settlements and established tourist attractions where these are compatible with environmental legislation.
- e) Support the leisure fishing industry and continue to support golf tourism as positive growth sectors in the sustainable economic development of the County while also maintaining the integrity of the landscape and environment of the county as a valuable asset into the future.
- f) Encourage the provision of small scale agri tourism accommodation and the reuse of disused/derelict farm buildings, in line with the provisions of objectives RP 5-28 Small Scale Agri Tourism Accommodation and RP5-31 New uses for disused or derelict farm buildings.

Objective RP 5-26: Demand for Holiday and Second Home Development

Recognise that sensitive scenic areas such as coasts, lakeside areas and uplands are limited in their capacity to carry significant levels of development and that such capacity as exists needs to be carefully managed to prioritise the needs of rural communities rather than for holiday and second home development.

Objective RP 5-27: Holiday Home Accommodation

Encourage appropriately scaled holiday home development to locate within existing settlements, where there is appropriate infrastructure provision, where they can contribute to the maintenance of essential rural services and help act as a revitalising force in counteracting population decline.

Objective RP 5-30: Redevelopment or replacement of an Uninhabitable or Ruinous dwelling

Objective RP 5- 31: New uses for disused or derelict farm buildings.

Encourage the sensitive refurbishment and conversion of suitable disused or derelict traditional farm buildings, built using traditional methods and materials, and other

suitable historic buildings such as mills and churches, for residential purposes, community, or commercial uses (including social enterprise) where appropriate, subject to normal planning considerations, while ensuring that the re-use is compatible with environmental and heritage protection.

Objectives HE 16-6: Industrial and Post Medieval Archaeology Protect and preserve industrial and post-medieval archaeology and long-term management of heritage features ...

Objectives HE 16-19: Vernacular Heritage

C) There will generally be a presumption in favour of the retention of vernacular buildings and encouragement of the retention and re-use of vernacular buildings subject to normal planning considerations, while ensuring that the re-use is compatible with environmental and heritage protection.

5.2. Natural Heritage Designation

The nearest designated site- Old Head of Kinsale SPA (Site Code 004021) is located approximately 0.8km from the subject site. The Old Head of Kinsale pNHA is located approximately 0.2km from the subject site.

5.3. EIA Screening

Class (10)(b) of Schedule 5 Part 2 of the Planning and Development Regulations 2001 (as amended) provides that mandatory EIA is required for the following classes of development:

- Construction of more than 500 dwelling units,
- Urban development which would involve an area greater than 2 ha in the case of a business district, 10 ha in the case of other parts of a built-up area and 20 ha elsewhere. (In this paragraph, “business district” means a district within a city or town in which the predominant land use is retail or commercial use.)

The proposed development is for 6 no. holiday homes plus one caretaker’s lodge on a site c. 6.73 ha. The proposed development is considered to be sub-threshold in

terms of EIA having regard to Schedule 5, Part 2, 10(b) (i) and (iv) of the Planning and Development Regulations 2001 (as amended). Accordingly, it does not attract the need for a mandatory EIA. Furthermore, as this proposal would fall below the relevant threshold, I conclude that, based on its nature, size, and location, there is no real likelihood of significant effects upon the environment and so the preparation of an EIAR is not required.

5.5 Appropriate Assessment Screening

5.6 All designated sites within 15km radius of the development site have been screened out due to distance and lack of hydrological connections. The nearest designated site, the Old Head of Kinsale SPA (Side Code 4021), is located approximately 700m from the subject site. This SPA is designated for Kittiwake and Guillemot. In terms of disturbance, as the proposed development site is sufficiently distant from the SPA and within an area with high agricultural activity and human activity (golfing), significant disturbance related impacts are unlikely to occur at either construction or operational phases. As both SCIs nest along cliffs and forage at sea, no impacts to suitable ex-situ habitat will occur. No direct impacts will occur, as the development site is outside the boundary of the designated site.

5.7 Having regard to the nature and scale of the proposed development, the location of the site, the physical separation distances to designated European Sites, and the absence of an ecological and/or a hydrological connection, the potential of likely significant effects on European Sites arising from the proposed development, alone or in combination effects, can be reasonably excluded.

6.0 The Appeal

6.1. Grounds of Appeal

Four third-party appeal submissions were received, which each raised similar issues and which may be broadly summarised as follows:

- Policy Concerns- not in keeping with CDP whereby tourism related developments are ideally located within existing settlements; distance from

golf links leads it to being a separate development; demolition of existing structures contrary to Development Plan policy

- Drainage concerns: no access to Uisce Eireann infrastructure; 24 bathrooms with a water consumption rate of 12,000 litres/day; no public water supply in vicinity- huge impacts on water table for neighbouring residents, farmyards, livestock; water availability concerns; improvements to water supply for area needed before any such development takes place; inadequate assessment undertaken; assessment undertaken during wettest and coldest May in recent history; proposal contrary to Objective WS4-1; lack of analysis on impacts of proposal on existing, nearby wells; concentration of ongoing excessive water usage at a single location in this area is unprecedented; impacts on neighbouring wells during summer drought
- Residential Amenity: impacts on neighbouring properties; light pollution; noise impacts; devaluation of property; impacts on privacy; impacts on views; height and location of pumphouse
- Visual Amenity: Located in High Value Landscape; vulnerable to such development; out of character with existing area; inappropriate form of development; not within existing settlement of golf course; height, density and scale (712m² being replaced with development of 1570m²); block sea views; visual impacts of car park; overdevelopment of this unique landscape; description of development namely calling apartment block a 'barn'; visibility of proposal from neighbouring properties.
- Archaeological Concerns: demolition of remains of Post Medieval Vernacular houses
- Traffic Concerns: inadequate road infrastructure; local road unsuitable for additional traffic; traffic already very busy when golf club open and with tourists along Wild Atlantic Way; increased traffic; speeds higher than 50 kph; quantum of car parking/buggy spaces
- Other Matters: proximity to NHA; impacts on designated sites; impacts on bats; better to generate housing for locals; contrary to sustainable development of the area; clarity of information provided; lack of information

provided; lack of consultation with local residents including with regards to pre-application consultations; setting of precedent; boundary concerns; validation matters

6.2. Applicant Response

A response was received on behalf of the applicant, which may be broadly summarised as follows:

- Refutes grounds of appeal, all items raised were comprehensively assessed by the planning authority
- Sets out purpose and history of proposed development- seeks to provide additional high quality accommodation stock in order to respond to market need and enhance the economic benefits of the established golf links to the Kinsale area
- Proposal considered to be in compliance with Development Plan policy, cites Chapter 10 and Policy TO 10-10 of Plan which seeks to support golf tourism... and also acknowledges the need to spread appropriate tourism growth and ...related enterprises beyond established resorts and larger towns to rural areas
- Strong policy support to facilitate and maximise the development of the tourism sector within the county and to develop, enhance and protect new and existing tourism assets
- Proposal is in proximity to a tourist attraction, there is a defined need, benefits to local community can be balanced with the potential environmental impacts of the development
- Proposal designed to emulate the scale, massing and profile of existing farmyard cluster of buildings; integrates with surrounding landscape and topography; acknowledges that proposal will be visible from public road/neighbouring properties, but proposal does not significantly impact on viewpoints from these- refers to CGIs prepared as part of application; impacts on sea views would not be any greater than currently exists

- In terms of water supply levels, pump test identified that the groundwater supply capacity of the proposed development borehole is such that they will only need to abstract less than 50% of the sustainable yield of the well to provide the required water supply. The development's proposal to provide 7-day storage via 2 no. 20m³ tanks in addition to rainfall harvesting mitigates any potential risk to existing supplies
- Proposal does not significantly impact on residential amenities
- Does not generate additional traffic movements- will cater for club members and golf visitors during the golfing season. Only certain number of players can use golf course at any one time, so no additional increase in traffic. Guests will still need to reserve their tee time. Reduction in traffic to/from Kinsale where main tourist accommodation is available.
- Existing structures not Protected Structures, no known archaeological monuments in the yard or in immediate vicinity. Proposed preservation by record of the heritage dwellings and reuse of stone is considered acceptable given current state of building
- Does not significantly impact on any ecological species and the environment, subject to appropriate mitigation measures
- Architectural Design Response submitted, which sets the design rationale for the proposal, history of development on the site, form and materiality- notes that a barrel-vaulted barn of similar size and height previously stood on this site. CGIs included
- Technical Response Note also included- highlights that the new supply well was pumped for 72 hours at nearly three times the required supply volume and 5 on-site boundary monitoring boreholes and 9 local residential and/or farm supply wells were monitored with the instillation of automated water level data loggers before, during and after the pump test; carried out with best industry practice. Addresses points made in appeals submissions in relation to water supply. Notes that the groundwater supply capacity of the proposed development's borehole is such that they will only need to abstract less than 50% of the sustainable yield of the well. No impacts on the groundwater

supplies of local residences were identified by the hydrogeological assessment. Notes conditions attached by PA in relation to monitoring

- Updated Planting Schedule also submitted

6.3. Planning Authority Response

- Lighting Reality Design Report to be submitted prior to commencement of development
- Proposal compatible with CDP which seeks to support golf tourism (Policy Objective TO10-10) which allows careful consideration of tourist-related developments outside settlements while also maintaining the integrity of the landscape and environment
- Full assessment undertaken for impacts on designated sites, in particular Old Head of Kinsale SPA
- Architecture sympathetic to the context and fits into visual sensitivities of this 'high' landscape value; proposed barn will not harm residential amenities of nearest occupiers
- Water supply and potential for impacts was explored in detail with appropriate retention measures accepted by Council's Engineers
- Site specific conditions are critical, designed to achieve a high standard of development and ensure other parts of CDP with regards to Settlement Strategy and approach to Rural Housing are not undermined

6.4. Observations

Three observations were received with the matters raised similar to those contained within the appeal submissions and outlined above. In the interests of brevity, I will not reiterate but will refer the Board to same. I shall expand on matters raised within the main body of my report. Additional matters raised are as follows:

- Little or no consideration given to alternatives to providing accommodation within their existing portfolio of property including vacant townhouse within Kinsale town

- Use of proposed development on long-term lease or on timeshare; Business Plan states 12-month usage
- Not within existing settlement as per Objective TO 9-10; sufficient accommodation within area
- Being built for commercial use and not for those who live locally- Rural Area under Strong Urban Influence and CDP sets out strict planning considerations where the development of new homes to outsiders is restricted; proposal is not for a place of permanent residence
- Concerns for helicopters landing on site; possible future plans for helipad close to site

6.5. Further Responses

A further response was received from Maurice Fitzgerald, which expands upon points made in original submission; no new planning matters raised.

7.0 Assessment

- 7.1. The proposed development comprises permission for the demolition of an existing farmhouse dwelling and associated farm buildings on site (two of which are stated to be heritage dwellings) and construction of 4 no. single storey dwellings each with covered deck area and external fire pit; a two-storey 'barn' structure accommodating two apartments with associated covered deck area; a single storey caretaker's dwelling; upgrade and widening of existing entrance; 16 car parking spaces; 4 buggy spaces; new wastewater treatment system and polishing filter and all ancillary site development works. The 6 no. proposed units are for short-term holiday accommodation while the caretaker's lodge will provide accommodation for the caretaker who will provide 24-hour service to guests.
- 7.2. The proposed development is associated with the Old Head of Kinsale Golf Links, which is stated in the documentation to be one of the leading golf courses in the world and receives approximately 20,000 visitors annually (with 50% originating from the USA). The stated goal of the proposed development is to expand and modernise the Old Head Golf Links' guest accommodation offering, in order to maintain

competitiveness with other top-ranked golf courses in Ireland and internationally. It is stated that space is very limited on the Old Head itself and so the subject site was acquired in 2018 for the purpose of developing this proposed accommodation. The site is located approximately 2km north of the golf links clubhouse and is described in the documentation as a lush green coastal clifftop site similar to the golf links themselves.

- 7.3. I note that there is continual reference to Reg. Ref. 19/05571 in the submitted documentation including details of how this current application has been altered when compared to that previous application. I highlight to the Board that no decision was made on that file- it was deemed withdrawn by the planning authority. Therefore, any proposals/alterations from same are considered irrelevant to this current appeal.
- 7.4. Having examined the application details and all other documentation on file, including the reports of the planning authority and prescribed bodies, all appeal documentation received, observations and further responses; together with having twice inspected the site, I consider that the main issues in this appeal are as follows:
- Principle of proposed development/policy context
 - Residential and Visual amenity
 - Built Heritage/Archaeology
 - Drainage Matters
 - Other Matters

Principle of proposed development/policy context

- 7.4 This was one of the matters of concern raised in the third-party submissions received, namely that the proposal is not in keeping with County Development Plan whereby tourism related developments are ideally located within existing settlements; the distance from the golf links leads it to being a separate development; its use on long-term lease or on timeshare as submitted Business Plan states 12-month usage; that there is adequate accommodation within the area and that alternative sites within Kinsale were insufficiently explored. The matter was also

raised that the demolition of the existing structures on site leads it to being contrary to Development Plan policy but I shall deal with that matter below in the relevant section (Built Heritage/Archaeology). The first party refutes this ground of appeal and notes that there is strong policy support to facilitate and maximise the development of the tourism sector within the county and to develop, enhance and protect new and existing tourism assets. They further state that this proposal seeks to provide additional high quality accommodation stock in order to respond to market need and enhance the economic benefits of the established golf links to the Kinsale area. They consider the proposal to be in compliance with Development Plan policy, citing Chapter 10 and Policy TO 10-10 of Plan which seeks to support golf tourism... and also acknowledges the need to spread appropriate tourism growth and ...related enterprises beyond established resorts and larger towns to rural areas. The planning authority are satisfied that the proposed development is in compliance with Development Plan policy which seeks to support golf tourism (Policy Objective TO10-10) which allows careful consideration of tourist-related developments outside settlements while also maintaining the integrity of the landscape and environment.

- 7.5 I highlight Chapter 10 'Tourism' of the operative County Development Plan to the Board and acknowledge that there is a strong policy basis to support tourism contained therein. The Plan recognises that the sustainable development and promotion of a successful well managed tourism industry is critical to the economy of County Cork and furthermore that tourism has a critical role to play in the development of the Irish economy. It further states that with good planning and management, tourism can be a positive force, bringing benefits to tourist destinations and indigenous communities in the region. It seeks to encourage longer visitor stays and extend the tourist season to a year-round offering. It does recognise however that if the development of the sector is not planned carefully, it will result in environmental degradation and will impinge upon the quality of life of local communities. In terms of the NPF, I note that it acknowledges the need to develop the Rural Economy and support sustainable tourism in these regions (NPO 23).
- 7.6 I note Objective TO 10-10(a) which seeks to 'Encourage tourism related facilities, including accommodation and other developments within existing settlements subject to normal site suitability considerations where they can best support compact

growth and the regeneration of settlements, the provision of services and the general economic vitality of the settlement'. I acknowledge the wording of this objective which seeks to 'encourage' tourism related facilities... within existing settlements rather than stating that they 'shall' be within existing settlements. This allows for a degree of flexibility. This Objective further states that the planning authority will carefully consider tourism - related developments outside settlements at an appropriate scale and balance having regard to the pertaining environmental conditions and sensitivities, scenic amenity, availability of services and the cumulative impact of such developments on the environment (Objective TO 10-10(b)).

- 7.7 I highlight that the proposed development is located within a rural area, outside of any existing settlement. I consider this to be a sensitive area- the scenic beauty of this headland cannot be over-emphasised. It is designated as a High Value Landscape Area within the operative County Development Plan, with an Overall Landscape Value of 'Very High'. There are scenic views in all directions. The local road (L3233) to the west is designated as a Scenic Route (S66) while Scenic Route (S67) is located on the western side of the headland (approximately 450m from the application site). Development in the general vicinity is limited to single dwellings and associated farm buildings. I would consider this area to have relatively limited capacity to accommodate individual houses in significant numbers (section 5.9.3 of CDP). In terms of scale of the proposed development, I note that in total 7 no. residential units are proposed (6 no. holiday lets and 1 no. caretaker's unit). This scale of development is much greater than what currently exists in the area. One of the third-party submissions received states that the proposal would be better suited within the built-up area of Kinsale and that other alternative locations were not adequately examined. I would not disagree with the assertion that this scale of development may be better suited to within a built-up area. The applicants give a justification for the proposed development and I highlight the submitted Tourism and Economic Benefit Statement to the Board. The Statement highlights that the proposal will deliver significant benefits to Kinsale and the surrounding region. The Clubhouse at the golf course currently offers 15 guest suites, including the larger Presidential Suite (and a further 5 suites permitted under Reg. Ref. 19/05572). It is stated that this capacity is insufficient to meet existing and future potential demands.

Responding to this demand, the expansion of accommodation offerings is envisaged by the applicants to comprise of three main developments, of which this current proposal forms one element. It is also envisaged by the applicant that five additional rooms would be offered at the Clubhouse (bringing total to 20 suites), together with the building of a townhouse in Kinsale town centre, that would incorporate up to 40 suites, plus rooftop bar/restaurant. These latter two elements do not form part of this current planning application/appeal.

- 7.8 I have had regard to all of the information before me in relation to this matter, including having twice visited the site and its environs. I acknowledge the operative County Development Plan contains many policies and objectives to support rural tourism and also acknowledges the need to spread appropriate tourism growth and tourism related enterprises beyond the established resorts and larger towns to rural areas. I also acknowledge that some tourist facilities are required to locate in rural areas in proximity to the tourist attraction they are serving where there is a clearly defined need. This subject development is within 2km of its tourist attraction. Notwithstanding this, I consider the landscape in which the proposed development is to be located to be particularly sensitive and I question whether this is the most appropriate location for such a development, given these sensitivities. Objective TO 10-10(a) seeks to encourage tourism related facilities, including accommodation and other developments within existing settlements subject to normal site suitability considerations where they can best support compact growth and the regeneration of settlements, the provision of services and the general economic vitality of the settlement' and I consider that this current proposal, given its overall scale within such a sensitive landscape, would be better placed within an existing settlement. I acknowledge the case put forward by the applicants in relation to the need for such a development at this location. However, it is noted that the golf course currently has 15 newly refurbished suites within its grounds (and a further 5 suites permitted), so therefore it is not as if they have no accommodation offering within the vicinity. I consider that given the limited scale of development within the area, the provision of 20 suites is itself quite sizeable. The proposed development is not within the grounds of the golf course, with the reasons given that there was no suitable site available. Given that this current proposal is located approximately 2km from the clubhouse, guests staying in these proposed units would need to travel along the

local road network to/from the course. Given that they would be travelling in any event, travelling from Kinsale or another established settlement would not be so great an issue than if they were staying within the grounds of the course itself. In addition, the submitted Tourism and Economic Statement states that the most important source of economic gain will be expenditure by guests who stay at the accommodation. Given the limited opportunities for such expenditure within the rural area in which these proposed units are to be located, it is anticipated that much of this expenditure will be in nearby towns like Kinsale. Therefore, guests will be travelling to these existing settlements in any event.

7.9 I note that the lands are located within a 'Rural Area under Strong Urban Influence' in the operative County Development Plan but are not located within a 'Tourism and Rural Diversification Area', which are rural, coastal areas of the County that have evidenced considerable pressure for rural housing, in particular higher demand for holiday and second home development. I also note Objective RP 5-26 which recognises that sensitive scenic areas such as coasts are limited in their capacity to carry significant levels of development and that such capacity as exists needs to be carefully managed to prioritise the needs of rural communities rather than for holiday and second home development. This has been raised as a matter by third parties. I am of the opinion that this is an area of limited capacity and the provision of seven dwellings for a holiday development (in addition to the existing 15 within the applicants ownership, and a further 5 suites permitted under Reg. Ref. 19/05572) significantly eats into this capacity. I would question that given the existing scale of residential development offered by the golf club in the vicinity, if the needs of the rural community are being prioritised if this proposal were permitted, given that this is a rural area designated as being under 'Strong Urban Influence' in the operative County Development Plan.

7.10 In addition, I highlight that these are all residential units of substantial size, with each dwelling (apart from the Caretaker's lodge) being in excess of 240m² while the proposed 'barn' structure containing two apartments has a stated floor area of 452m². Furthermore, Objective RP 5-27 seeks to encourage appropriately scaled holiday home development to locate within existing settlements, where there is appropriate infrastructure provision, where they can contribute to the maintenance of

essential rural services and help act as a revitalising force in counteracting population decline. I consider that the provision of such accommodation within an established settlement such as Kinsale would be a superior option- it would negate any impacts on this sensitive landscape, there is more appropriate infrastructure provision within an established settlement and such a development could act as a revitalising force, in particular if a vacant/underutilised building was brought back into use. Given that the applicant already has plans to provide an accommodation offering in Kinsale for up to 40 units, the provision of such facilities within this established settlement is obviously suitable for their needs.

- 7.11 The applicants state in their documentation that the proposed units may be used for long-term lease or on timeshare basis. This is due to the golf course normally being closed from November until March, so the accommodation would be available to others during the remaining months of the year. Private events could also be hosted at the clubhouse, who could be accommodated at the proposed development. The planning authority raised serious concerns in this regard and state that site specific conditions are critical to ensure other parts of CDP with regards to Settlement Strategy and approach to Rural Housing are not undermined. I would agree with the opinion of the planning authority in this regard and I highlight Conditions 2, 3 and 4 of the grant of permission which issued from the planning authority in this regard. Any deviation from short-term holiday accommodation would conflict with Development Plan policy. This is especially pertinent given that the application site is located within the Bandon-Kinsale Local Electoral Area, which was designated as a Rent Pressure Zone in July 2020. If the Board is disposed towards a grant of permission, I recommend that similarly worded conditions be attached to any such grant.
- 7.12 If the proposal included the retention of the existing farmhouse and some associated outbuildings, I consider that there could be some limited argument for the proposal, but given that full demolition of all existing structures is proposed, I consider that the proposed development is not acceptable at this sensitive location; would reduce the existing limited capacity to prioritise the needs of this rural community and is inconsistent with the proper planning and sustainable development of the area. While Objective TO 10-10(e) seeks to support golf tourism as a positive growth sector in the sustainable economic development of the County, it also acknowledges

that this needs to be achieved while also maintaining the integrity of the landscape and environment of the county as a valuable asset into the future. I am not convinced that this is being achieved in this current instance and I consider that the provision of such accommodation within an established settlement like Kinsale would be a more appropriate option, which would support golf tourism whilst maintaining this integrity.

- 7.13 I have no doubt that the proposal would provide a quality offering for any future guests. I also agree that there are very limited options within the Old Head to accommodate a grouping on self-catering basis. However, given the sensitivities of the area, this may not necessarily be a negative. I consider that the granting of permission for the proposal in this sensitive location removed from the tourist facility it is seeking to accommodate (2km distant), would set an undesirable precedent for further similar developments in such sensitive, rural locations. Given that there are 15 existing accommodation suites within the Clubhouse (and a further 5 suites permitted under Reg. Ref. 19/05572), I consider that there is not an insignificant quantum of accommodation offering presently available at this location. The current proposal is removed from the golf course lands and I consider that more appropriate locations exist for such a development, namely within an established settlement. Having regard to all of the above, I am therefore not satisfied in this regard.

Residential and Visual Amenity

- 7.14 In terms of impacts on residential amenity, I highlight that the third-party submissions raised concerns in this regard. Concerns raised include issues of impacts on neighbouring properties; light pollution; noise impacts; devaluation of property; impacts on privacy; impacts on views; height and location of pumphouse. The applicants refute these claims and state that the proposal does not significantly impact on residential amenities and the planning authority have not raised concerns in this regard.
- 7.15 I am cognisant of the relationship of the proposed development to neighbouring properties. I am satisfied with the heights proposed and consider that they would integrate well with existing development in the immediate locality. Given the

proposed design rationale submitted, together with the separation distances involved, I am of the opinion that the proposed development would not unduly overbear, overlook or overshadow adjoining properties, and would not seriously injure the amenities of property in the vicinity of the site. I am satisfied that impacts on privacy would not be so great as to warrant a refusal of permission. I have no information before me to believe that the proposal would lead to devaluation of property in the vicinity. Given the proposed residential use, I do not anticipate noise levels to be excessive. This is particularly so, given the separation distances involved. I am generally satisfied in this regard.

- 7.16 In terms of impacts on visual amenity, I note that this was a matter of concern raised by third parties. Matters raised include that the site is located in High Value Landscape which is vulnerable to such development; that the proposal is out of character with the existing area; is considered to be overdevelopment and an inappropriate form of development in this unique landscape. In addition, the height, density and scale is of concern; the proposal would block sea views; visual impacts of car park and visibility of proposal from neighbouring properties. The applicants refute these concerns stating that the proposal emulates the scale, massing and profile of the existing buildings on site and respects the character of the original cluster through carefully considered use of form and materiality. They further state that every effort has been made to produce a development that does not visually impact on its setting. The planning authority have not raised concerns in this regard.
- 7.17 The local road to the west is designated as a Scenic Route (S66) while Scenic Route (S67) is located on the western side of the headland (approximately 450m from the application site). The site is located within a High Value Landscape with an Overall Landscape Value of 'Very High'. It is stated in the operative County Development Plan that such HVL are considered to be the most valuable landscapes and that considerable care will be needed to successfully locate large scale developments without them becoming unduly obtrusive (section 14.8.9). This is a coastal and agricultural landscape. In terms of Scenic Route S66, the views being protected are along the R604 regional Road and Local Road between Barrel Cross Roads and the Old Head of Kinsale, views of Bullen's Bay, Holeopen Bay and the sea. I consider the proposal to have greater potential to impact on this view than on Scenic Route

S67 as this route is located on the local road (L3233) that immediately abounds the subject site. I note Objective GI 14-13 which seeks to protect the character of those views and prospects obtainable from scenic routes and in particular stretches of scenic routes that have very special views and prospects identified in this Plan. Furthermore, Objective GI 14-12: seeks to preserve the character of all important views and prospects, particularly sea views, river or lake views, views of unspoilt mountains, upland or coastal landscapes, views of historical or cultural significance (including buildings and townscapes) and views of natural beauty as recognized in the Draft Landscape Strategy.

- 7.18 I am of the opinion that the proposal has potential to impact most on distant views, in particular as one travels downhill from the south towards the site. I agree with the opinion of the planning authority that the design approach has been well considered with the layout generally reflected the footprint of the existing structures on site. A quality design solution has been put forward. The existing farmhouse and out-buildings read as one agricultural complex as one travels along the local road. They are most visible as you travel downhill approaching from the south. This proposed development would also read as one complex as one travels along the local road, again being most visible as one travels north. While the layout and positioning on site reflects that existing, the proposed development, given its greater scale, will read as a relatively large residential development on the landscape. It will clearly read as not being agricultural in nature. Its scale is much larger than that currently existing on site- existing structures are stated to have a GFA of 717.06m² while that proposed is stated as being 1570.49m². The proposed floor area is over double that currently existing. Notwithstanding that there is stated to have previously been a barn structure on site, prior to being destroyed by fire, and also notwithstanding the barrel roof which seeks to mimic the traditional barn structure, I note that that at 8.35m in height and an overall length of approximately 29.4m, it will be clearly visible on the landscape at this location. Some of the third-party submissions contend that to call the two-storey barrel structure a 'barn' is inaccurate, that it is better described as an apartment building. It contains two no. apartments, with a total stated floor area in excess of 500m². While the design of this barrel structure seeks to mimic traditional farm structures in the landscape, I have concerns that it will be overly visible and overbearing on the landscape.

7.19 While I fully acknowledge the policies and objectives within the operative County Development Plan to support rural tourism and the need to spread appropriate tourism related enterprises to rural areas, I would consider that not all rural areas are equal in terms of their sensitivities and I have concerns regarding the impacts that a development such as that proposed would have on the visual amenity of the landscape. I have set out the sensitivities of the area including it being a High Value Landscape of 'Very High' value with designated Scenic Views. While this proposed development may be considered appropriate in other rural locations, I consider that it is not appropriate at this location in terms of impacts of the visual amenity and character of the area. I also fully acknowledge that the proposal presents a quality design proposal in terms of design rationale, architectural form and materiality. Notwithstanding this, given the overall scale of the development proposed on this Very High value landscape, where there are designated scenic views, I consider that the proposed development would be unduly visible at this location, would represent an incongruous element in the landscape and would set an undesirable precedent for other similar developments at such locations.

Built Heritage/Archaeology

7.20 I highlight to the Board that this was raised as a matter of concern in many of the third-party submissions received, primarily concerns regarding the demolition of the remains of Post Medieval Vernacular houses and compliance with Development Plan policy in this regard. The applicants refute the grounds of appeal and highlight that the existing structures on site are not Protected Structures and that there are no known archaeological monuments in the yard or in immediate vicinity. They further contend that the proposed preservation by record of the heritage dwellings and reuse of stone is considered acceptable given current state of building. The planning authority dealt with the matter of demolition of the existing structures on site as part of their Further Information request and an Archaeological Assessment and Structural Engineering Appraisal were submitted as part of the applicant's response. The Structural Assessment was undertaken of the two heritage dwellings (referred to as H1 and H2 in the submitted reports) and this concluded that the remaining original stonework for both houses are currently in a poor structural state and that their retention and integration into the proposed development would be challenging, in

particular, the practicalities of constructing modern compliant habitable building structures. In addition, to construct new dwellings adjacent to the old walls would undermine these walls and would require new concrete underpinning. Due to their current condition, there would be significant risk of damage and/or collapse of the old walls during such works. It is therefore proposed to integrate as far as possible the remnants of the footprints of the two heritage dwellings into the proposed development and incorporate sections of the original wall line into proposed Dwelling No. 1 with preservation by record. It is therefore my understanding that both heritage houses are being demolished with the wall of one dwelling being reinstated as part of the gable wall of proposed House No. 1. The remainder shall be preservation by record.

- 7.21 The planning authority state that in relation to the proposed heritage farmhouses, that they have been very heavily modified and while their retention would have been a planning/heritage gain, they are not critical to the overall scheme. They further state that it has to be accepted and embraced that the overall scheme offers high quality architecture based on interpretation and understanding of the traditional farmstead. I do not dispute that the overall scheme offers high-quality architecture based on the layout of a traditional farmstead. I note the PA Archaeologist's Report raises concerns in this regard and highlights that it is proposed to remove the original heritage features that inspired the current design. The Archaeologist's Report acknowledges that while these dwellings are somewhat compromised by modern interventions, they still retain much of their historic character and form and that while not designated as architectural monuments, they provide information on how ordinary people lived in the past. It is their opinion that the buildings on site represent an important sequencing of historic dwelling and are worthy of restoration.
- 7.22 From the documentation attached to the file, I note that House 1 is stated to appear in the 1821-43 OS map and would have been the original farm dwelling cottage. It is a random rubble and mud stone structure. The walls were modified in the 1960s and there is no evidence of the original cottage roof. The old walls are stated to be in poor structural repair. House No. 2 is a two-storey, three bay house structure constructed sometime in the mid to late 19th century. The walls are formed with horizontally laid shale with mud bonding and are intact, but with significant cracks to

sections of the walls. The house is currently roofed in a metal corrugated sheeting with concrete barges. Internally there is very little surviving from the period of use as a domestic dwelling because it was modified in the 1960s as a cow stall.

- 7.23 I note that these buildings have no heritage designations, they are not Protected Structures nor are they listed on the Site and Monuments Record. I highlight to the Board that there is discussion in the first party response to the appeal with regards the definition of 'post-medieval heritage buildings' and that given their age, whether they can be referred to as such. This argument is noted. Irrespective of whether these structures are technically 'post-medieval heritage buildings' or otherwise, they are vernacular architecture, their design and materiality reflecting a period in time. I consider that it was a missed opportunity not to preserve them in situ and to provide heritage authenticity within the contemporarily designed complex. This is also the opinion of the planning authority Archaeologist.
- 7.24 I would agree with the opinion of the planning authority Archaeologist and consider that while it may not have been feasible to convert them to residential use, they could be considered as storage buildings or for some other use (possibly as a museum room outlining the history of the site and the wider area). I consider the proposal put forward for preservation by record and reinstating one wall into proposed House No. 1 to be a poor attempt at protecting and enhancing the established character of the site. These buildings make a valuable contribution to the historical, social and cultural heritage of the area (albeit not Protected) and their replacement with a new- built development that seeks to mimic this character and setting while at the same time demolishing that existing, is contradictory and not appropriate in my opinion. I also note that the proposal includes the demolition of the existing 1950s cottage on site, which was built to replace the old farmhouse. There are essentially three phases of development on the site. While these 1950s cottages are commonplace in the Irish country-side and are of no particular architectural merit, I am of the opinion that in themselves they represent a vernacular style of architecture of that period. They too contribute to the heritage of the site and to the local character of the area. There is little commentary in the documentation to provide justification for its demolition. The complex currently has an established character and form that adds to the local character and provides a sense of place, visible on the landscape as one travels downhill from the south. That is being

removed and while the design proposal seeks to mimic the setting, layout and form, it begs the question why the existing buildings are being demolished in the first instance. While I fully accept that the heritage dwellings are in a poor state of repair and their conversion to habitable use is not realistically an option, they could be better integrated into the proposed scheme and used for storage purposes or as a history piece outlining the history of the site and its surrounds, amongst other uses.

- 7.25 There is strong policy support within the operative County Development Plan to protect and retain vernacular buildings and recognise the contribution they make to the character of the landscape in which they are situated. I note that Objective HE 16-19 seeks to protect, maintain and enhance the established character, forms, features and setting of vernacular buildings, farmyards and settlements and the contribution they make to our architectural, archaeological, historical, social and cultural heritage and to local character and sense of place. This is not being achieved in this instance. In addition, Objectives HE 16-19 (C) states that there will generally be a presumption in favour of the retention of vernacular buildings and encouragement of the retention and re-use of vernacular buildings subject to normal planning considerations, while ensuring that the re-use is compatible with environmental and heritage protection. Furthermore, Objective RP 5- 31 seeks to encourage the sensitive refurbishment and conversion of suitable disused or derelict traditional farm buildings, built using traditional methods and materials, and other suitable historic buildings such as mills and churches, for residential purposes, community, or commercial uses (including social enterprise) where appropriate, subject to normal planning considerations, while ensuring that the re-use is compatible with environmental and heritage protection. I am of the opinion that the proposal is not in compliance with these Objectives of the operative County Development Plan.

Drainage Matters

- 7.26 One of the primary issues raised in the third-party submissions received relates to drainage matters, in particular water supply concerns. These concerns relate to there being no access to Uisce Eireann infrastructure; scale of proposed development with 24 bathrooms with a water consumption rate of 12,000 litres/day and subsequent water availability concerns including impacts on neighbouring wells during summer drought. They contend that the concentration of ongoing excessive

water usage at a single location in this area is unprecedented. The third-parties contend that improvements to water supply in the area are needed before any such development takes place and that the proposal is contrary to Objective WS4-1 of the operative County Development Plan. Finally, they raise concerns regarding the undertaking of inadequate assessment and timing of same (during wettest and coldest May in recent history). The first party refute these grounds of appeal and include with their response a Technical Response Note. In terms of the matter raised by third parties in relation to inadequate assessment, I note that two pump tests were undertaken, each over a two-day period in July 2020 and May 2021. Third parties raise concerns that testing was undertaken in an unusually wet May, which could skew results. The planning authority state that while average rainfall during May was wetter than long-term average, the preceding two months were both drier than long-term average, with the beginning of May being dry. I am satisfied with this response. The first party state that the new supply well was pumped for 72 hours at nearly three times the required supply volume. In addition, 5 on-site boundary monitoring boreholes and 8 local residential and/or farm supply wells were monitored with the installation of automated water level data loggers in neighbouring wells before, during and after the pump test, in line with best industry practice. I am satisfied in this regard. The first party state that in terms of water supply levels, the pump test identified that the groundwater supply capacity of the proposed development borehole is such that they will only need to abstract less than 50% of the sustainable yield of the well to provide the required water supply. In addition, they state that the development's proposal to provide 7-day storage via 2 no. 20m³ tanks in addition to rainfall harvesting mitigates any potential risk to existing supplies. No impacts on the groundwater supplies of local residences were identified by the hydrogeological assessment. In addition, the first party notes conditions attached by the planning authority in relation to monitoring. I refer the Board to Conditions 12-14 inclusive in relation to drainage matters.

- 7.27 The planning authority have not raised concerns in this regard. They state that water levels in neighbouring wells show no evidence of hydraulic connectivity to the production well. They further contend that the proposal to provide 7-day storage via 2 no. 20m³ tanks in addition to rainfall harvesting mitigates the risk to existing supplies.

7.28 An Engineering Report was submitted with the application documentation, which includes a Groundwater Assessment. I have no evidence before me to contradict the information contained within the application documentation. The water requirement for the development is stated as being 8,000 litres (8m³) per day or 5.5L/min, which is to be provided by a new borehole. During the testing undertaken, no drawdown effect was observed in any of the local domestic wells. The sustainable yield of the new well is estimated to be about 12L-15L/min, which is over twice the proposed maximum pumping rate (5.5L/min) required for the proposed development. I acknowledge the concerns of third parties in this regard. However, I have had regard to all of the information before me, including the technical reports of the planning authority and those submitted by the first party and I am satisfied that the proposed development is acceptable in this regard. No effect on any local well was identified during the high volume pump test scenario and therefore no effect should occur for the lower operating volume required by the site. The Groundwater Assessment notes that some of the local domestic wells are shallow and are potentially at risk of low water volumes during drought periods, regardless of any new wells being drilled in the area. The proposed production well will not change the existing vulnerability of the water supply available from these wells. This is considered reasonable. Having regard to all of the above, I am satisfied in this regard.

7.29 I highlight to the Board that an on-site wastewater treatment plant and polishing filter is proposed to deal with foul effluent disposal. It is proposed that all foul from the proposed development will be collected via underground drainage networks and conveyed by gravity to the wastewater treatment plant, to be located to the east of the development. The treated effluent will then be pumped from the WwTP to the polishing filter and discharged to gravel bed. The WwTP will be operated under discharge licence from Cork CoCo. Testing of the treated effluent will be undertaken a number of times per year and minimum twice yearly plant maintenance and desludging will also be undertaken. I highlight to the Board that there is no Uisce Eireann infrastructure in the vicinity. This is a significant quantum of development to be operating under an on-site WwTP, which includes for 25 bedrooms, each with their own en-suite. While I acknowledge that the plant will be appropriately sized, I do have some concerns in this regard, given the sensitive location of the site. The

planning authority have not raised concerns in this regard. As this is considered to be a new issue, and I have other substantive reasons for refusal, I am not recommending refusal in this regard.

Other Matters

- 7.30 Given that the occupants of the proposed units would already be travelling this roadway to the golf course, in any event, from wherever their accommodation is located, I am not unduly concerned in relation to traffic matters. Any increase in traffic would not be so great as to warrant a refusal of permission. I have no information before me to believe the proposal would result in obstruction of road users or the creation of a traffic hazard.
- 7.31 In terms of concerns raised in relation to impacts on bats, I note that the EcIA, submitted as part of the Further Information response to the planning authority, states that the landscape is considered to be of low suitability for foraging and commuting bats. The existing dwelling on site (1950s bungalow) was not accessible for inspection by the Ecologist but it is stated in the report that the building supports a number of gaps under roof tiles, around window frames and in fascia boards by which bats may enter. There are also roosting opportunities for bats behind the fascia boards. The other buildings on site are considered to be of moderate to high suitability for roosting bats. Two emergence surveys were undertaken in May 2023, during which two Common Pipistrelle bats and seven Natterer's bats were recorded emerging from the old farmhouse. A single brown long-eared bat was also recorded, while Leisler's bat was recorded commuting overhead during the course of the surveys. The site is considered to be of County Importance for Natterer's Bat. If permission is granted for the proposed development, this matter needs to be dealt with by means of condition and derogation licence obtained from the NPWS. Pre-construction surveys of all buildings should also be required.
- 7.32 Lack of clarity in the information submitted by the first party has been raised in some of the third-party submissions. I am satisfied that there is adequate information on file for me to undertake a comprehensive assessment of the proposed development.
- 7.33 Possible future planning applications on the overall lands are outside the remit of this planning appeal.

- 7.34 While consultation with local residents could be beneficial to all parties, there is no legal obligation on the developer to undertake any such consultations.

Conclusion

- 7.35 Having regard to the above, I am not satisfied with the proposal before me for the matters outlined above. The proposal is therefore considered not to be in accordance with the proper planning and sustainable development of the area.

8.0 Recommendation

- 8.1. I recommend that the decision of the planning authority be OVERTURNED and that permission be REFUSED, for the following reasons.

9.0 Reasons and Considerations

1. Objective HE 16-19 of the Cork County Development Plan 2022-2028 seeks to protect, maintain and enhance the established character, forms, features and setting of vernacular buildings, farmyards and settlements and the contribution they make to our architectural, archaeological, historical, social and cultural heritage and to local character and sense of place. Furthermore, Objectives HE 16-19 (C) states that there will generally be a presumption in favour of the retention of vernacular buildings and encouragement of the retention and re-use of vernacular buildings subject to normal planning considerations, while ensuring that the re-use is compatible with environmental and heritage protection. The proposed development, which includes for the demolition of all existing farmyard structures on site is considered to contravene these Development Plan objectives and the proposal would have a negative impact on the historical and cultural heritage of the site, its local character and sense of place. In addition, the proposal, if permitted, would set an undesirable precedent for other similar type developments. The proposal is therefore considered not to be in accordance with the proper planning and sustainable development of the area.
2. The subject site is located in a High Value Landscape, considered to be of 'Very High' value within the operative Cork County Development Plan 2022. There are

designated Scenic Views (S66) along the local road in front of the site. The proposed development, by virtue of its location within this sensitive landscape, its overall scale and its visibility, in particular as one travels downhill along the local road from the south, would be visually obtrusive; would form a dominant feature on the landscape and would have a negative impact on the visual amenity and character of the area.

Furthermore, Objective TO 10-10(a) of the Cork County Development Plan 2022-2028 seeks to encourage tourism related facilities, including accommodation and other developments within existing settlements subject to normal site suitability considerations where they can best support compact growth and the regeneration of settlements, the provision of services and the general economic vitality of the settlement. Given the overall scale, extent and nature of the proposal in this sensitive, rural landscape of high value with limited capacity for such development, the proposal is considered to contravene this objective of the operative County Development Plan and it is considered would be more appropriately located within an existing built-up settlement.

The proposed development, if permitted, would set an undesirable precedent for other similar such development in sensitive, rural locations and is therefore considered to be inconsistent with the proper planning and sustainable development of the area.

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.

Lorraine Dockery
Senior Planning Inspector

31st May 2024

Appendix 1 - Form 1

EIA Pre-Screening

[EIAR not submitted]

An Bord Pleanála Case Reference	ABP-317716-23			
Proposed Development Summary	Construction of 6 no. single storey “farmhouse” apartment units, caretaker lodge, and associated site works			
Development Address	Ballymackean, Old Head, Kinsale, Co. Cork			
1. Does the proposed development come within the definition of a ‘project’ for the purposes of EIA? <small>(that is involving construction works, demolition, or interventions in the natural surroundings)</small>		Yes	x	
		No	No further action required	
2. Is the proposed development of a class specified in Part 1 or Part 2, Schedule 5, Planning and Development Regulations 2001 (as amended) and does it equal or exceed any relevant quantity, area or limit where specified for that class?				
Yes		Class.....	EIA Mandatory EIAR required	
No	x		Proceed to Q.3	
3. Is the proposed development of a class specified in Part 2, Schedule 5, Planning and Development Regulations 2001 (as amended) but does not equal or exceed a relevant quantity, area or other limit specified [sub-threshold development]?				
		Threshold	Comment (if relevant)	Conclusion
No	x	N/A		No EIAR or Preliminary Examination required
Yes		Class/Threshold.....		Proceed to Q.4

4. Has Schedule 7A information been submitted?

No	x	Preliminary Examination required
Yes		Screening Determination required

Inspector: Lorraine Dockery Date: 31st May 2024