



An  
Bord  
Pleanála

## Inspector's Report

### ABP-319936-24

#### Development

Construction of 6 glamping pods with effluent treatment system to comply with current EPA requirements and all associated site works.

#### Location

Stroller's Place, Ballyedmonduff Road, Dublin 18

#### Planning Authority

Dun Laoghaire Rathdown County Council

#### Planning Authority Reg. Ref.

D24A/0205

#### Applicant(s)

Patrick and Lisa Davis

#### Type of Application

Permission.

#### Planning Authority Decision

Refuse

#### Type of Appeal

First Party

#### Appellant(s)

Patrick and Lisa Davis.

#### Observer(s)

None

#### Date of Site Inspection

29<sup>th</sup> of April 2025

#### Inspector

Caryn Coogan

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## 1.0 Site Location and Description

- 1.1. Ballyedmonduff Road is located south of Stepside village and north of Glencullen village the foothills of the Wicklow Mountains, in a scenic area which is elevated with panoramic views over the county and Dublin Bay.
- 1.2. The subject site, 0.336ha, is located to the rear of a dwelling house and farmyard within a grove of mature trees. The site is accessed from a laneway which runs south alongside the farmyard. The laneway is a right of way and is a narrow boreen.
- 1.3. The site consists of mature evergreen and native trees. It rises from east to west. The rear of the site (western portion) is level, grassed used to store machinery and an old caravan.
- 1.4. There is a bus stop along Ballyedmonduff road fronting the site.

## 2.0 Proposed Development

- 2.1. The proposed development consists of the following:
  - Proposed 6No. glamping pods
  - Access via right of way
  - Provision of carpark and access roadway
  - Effluent treatment system to comply with current EPA requirements
  - Connection to watermains.

## 3.0 Planning Authority Decision

### 3.1. Decision

Dun Laoghaire Rathdown Co. Co. REFUSED the proposed development for one reason:

*The proposal is for 6No. glamping pods at the subject site would materially contravene the stated zoning objectives and the existing policies and local objectives for the area zoned 'G' which seeks 'To protect and improve high amenity areas'. The subject site is located outside the zoning boundary of the Specific Local*

*Objective (SLO) 151 and is therefore @not Permitted' as per Section 13.1.5 of the County Development Plan. The proposal could also help set a negative precedent for such development in the locality and similar areas in the greater Dun Laoghaire Rathdown County Council area and would therefore not be in accordance with the proper planning and sustainable development of the area.*

### **3.2. Planning Authority Reports**

#### **3.2.1. Planning Reports**

- Caravan / camping is open for consideration under the G zoning but only in accordance with Specific Local Objective (SLO) 151 on Maps 12 and 13.
- The proposed development is not permitted as per section 13.1.5 of the County Development Plan.
- The development would not create undue negative impacts in terms of energy use/ performance
- The subject site is located on Land Use Zoning Map 9 and is located circa 760metres from the boundary edge of Specific Local Objective (SLO) 151 zone on Maps 12 and 13. A grant of permission would materially contravene policies and objectives for the local area including SLO 151.
- A visual impact assessment should be requested even though the proposal is considered to be of low visual impact.
- Further information required from the Parks Department, EHO and Drainage Department.
- Refusal recommended based on a material contravention.

#### **3.2.2. Other Technical Reports**

- Transportation Planning had no objections to the proposed development subject to conditions been attached that there should be cycle parking, no dirt or debris on the road, and construction activities must not conflict with road users.
- Drainage Planning recommended additional further information regarding the EPA wastewater treatment, density of wastewater treatment systems in the

area, location of trial hole and percolation test hole, grease traps, any laundry facilities to be provided, details of the pump, and the polishing filter.

- Parks Department requested further information:
  - (i) An Arborist Report is required.
  - (ii) The proposal would benefit from additional native tree planting, landscape report required.
  - (iii) Tree survey

### 3.3. Prescribed Bodies

There were prescribed bodies notified of the proposed development.

### 3.4. Third Party Observations

There was one submission to the planning application that supported the proposed development and considered the development would make a positive contribution to the area.

## 4.0 Planning History

There is no relevant planning history.

## 5.0 Policy Context

### 5.1. Development Plan

5.1.1 The ***Dun Laoghaire Rathdown County Development Plan 2022-2028*** is the current

According to the Core Strategy the subject site and the general area is defined as Rural.

#### 5.1.2 12.3.13 Rural – Temporary Accommodation

12.3.13.1 Holiday Caravan and Camping Sites

The Planning Authority recognises the tourist benefits of properly developed sites for holiday home type caravans, smaller trailer caravans, glamping pods and tents. These sites will generally be permitted in rural areas zoned 'B' where the topography would permit their siting without injury to amenity or public health. In rural areas zoned 'GB' holiday caravan sites are not 'permitted in principle' but may be 'open for consideration' depending on circumstances. The Planning Authority regards holiday caravan sites as sites for temporary (leisure/tourist) dwellings. Glamping pods should however be of a similar size and scale to a tent/caravan. The layout and servicing of such sites will be required to conform to the standards set out in the Fáilte Ireland – 'Registration and Renewal of Registration Regulations for Caravan and Camping Parks' (2009).

### 5.1.3 Relevant Policies/ Objectives in the current Development Plan

#### **6.4.2.16 Policy Objective E17: Tourism and Recreation**

*It is a Policy Objective to co-operate with the appropriate agencies in promoting sustainable tourism and securing the development of tourist and recreation orientated facilities in the County. Furthermore, the Council will promote the implementation of the Dún Laoghaire-Rathdown Tourism Strategy & Marketing Plan 2017–2022 and any subsequent update thereof.*

#### **6.4.2.18 Policy Objective E19: Rural Development**

*It is a Policy Objective to facilitate the development of acceptable rural enterprises and to minimise pollution from agricultural and industrial sources by means of development management and water pollution legislation.<sup>7</sup>*

### 5.1.4 **Table 13.1.5 ZONING OBJECTIVE 'G'**

*'To protect and improve high amenity areas'.*

Permitted In Principle: Open Space.

Open For Consideration: Allotments, Agricultural Buildings, Boarding Kennels, Caravan/Camping park holiday , Carpark , Cemetery, Craft Centre/Craft Shop , Childcare Service, Community Facility, Concrete/Asphalt (etc.) Plant in or adjacent to a Quarry, Cultural Use, Doctor/Dentist , Education, Garden Centre/Plant Nursery, Guest House , Home Based Economic Activities , Hotel/Motel , Industry- Extractive,

Place of Public Worship, Public Services, Residential , Restaurant , Rural Industry-Cottage, Rural Industry-Food, Shop-Neighbourhood, Sports Facility, Tea Room/ Café , Travellers Accommodation, Veterinary Surgery .

a: Only in accordance with Specific Local Objective 151 on Maps 12 and 13.

b: Only as an ancillary component of and directly connected to the primary use.

c: In existing premises.

d: In accordance with Council Policy for Development in Rural Areas.

#### **5.1.5 Specific Local Objective 151 on Maps 12 and 13**

To provide for a number of holiday caravan/camping facilities within a 1km radius of the cross roads at Glencullen subject to the following: ensuring that there is not an over proliferation of such facilities, ensuring any proposals do not undermine the overall zoning objective, ensuring proposals do not have a negative impact on the source protection area or sensitive watercourses as identified in the Glencullen Local Area Plan and/or in section 10.2.2.5 of this Plan and ensuring that the development (including any resultant increases in visitor numbers and/or behaviour) does not affect the integrity of the Knocksink Wood Special Area of Conservation. Each facility shall be limited to a total of 10 pitches (combination of pods, glamping, tents, camper vans) and any glamping pods shall be commensurate in size and scale to a tent/camper van so as to avoid any negative visual impact on the landscape.

#### **5.2. Natural Heritage Designations**

Proposed Natural Heritage Areas: Ballybetagh Bog (001202)

Proposed Natural Heritage Areas: Dingle Glen (001207)

Wicklow Mnts SAC (002122) west of the site

#### **5.3. EIA Screening**

The proposed development has been subject to preliminary examination for environmental impact assessment (refer to Form 1 and Form 2 in Appendices of this

report). Having regard to the characteristics and location of the proposed development and the types and characteristics of potential impacts, it is considered that there is no real likelihood of significant effects on the environment. The proposed development, therefore, does not trigger a requirement for environmental impact assessment screening and an EIAR is not required.

## **6.0 The Appeal**

### **6.1. Grounds of Appeal**

#### **6.1.1 Introduction**

- The applicants run a small sheep farm. They seek to diversify by providing 6No. glamping pod in a sheltered area which was previously used for the storage of farm vehicles and equipment. The area is close to the farmhouse and farm buildings would share an existing access.
- Permission was refused on the basis the proposal would materially contravene the zoning and associated policies of the County development Plan, in particular Specific Local Objective SLO 151.
- The proposed development meets all the specific planning requirements set out in SLO 151 and infringes only on an arbitrary requirement to restrict this Class of development to within 1km radius of Glencullen Crossroads.
- The restriction is not supported on any reasonable planning grounds and is in fact counter-productive in terms of achieving the stated aim of providing non-standard visitor accommodation.

#### **6.1.2 A Rural Project with Minimal Impact**

- The site includes mature trees and most of the site has been previously levelled and consolidated for parking/ storage of farm vehicles.
- The layout is informal and the disposition of the units is irregular to reduce the overall visual impact and to provide privacy between units.
- Units 1 to 4 are proposed to be located between trees without damaging them. There is scope to vary the layout within the red line. The adjoining



sheltered area could be provided on the northern side of the red line site and within the blue line of the main farm holding.

- The units are fully compliant with current energy conservation standards.

#### **6.1.3 *Technical Reports***

- The Inspectors is asked to consider the Pre-planning notes whereby the applicant was advised to consider the zoning issues only and there was no emphasis placed on other planning or technical issues.
- The applicant was not given an opportunity to respond to the technical issues by way of a further information request.
- Some of the issues raised in the technical reports are more urban related and appear to be based on a desk study as opposed to a site visit.

#### **6.1.4 *Specific Local Objective SLO 151***

- The 1km circle round Glencullen crossroads is a very restrictive imposition.
- The proposal meets with all specific, measurable and objective requirements of SLO 151.
- No reasons have been give in the CEO's report regarding the 1km restriction. There is no rationale for the 1km restriction.
- The 1km circle restriction is illogical, arbitrary and anti-competitive, and it does not represent best planning practices. The designation does not take into account national, regional and local tourism development projects.
- If the interactive map on the website relating to the CDP is intensified, many additional monuments appear. These monuments and their respective areas have increased restrictions and would have to be assessed by the appropriate authority before allowing development within the 1km circle.
- The Glencullen LAP is suppose to be under review. This Lap highlights the constraints associated with the R. Glencullen catchment area, which does not exist with the applicant's site.

#### **6.1.5 *National and Regional Agricultural Diversification and Tourism Plans***

- National agricultural plans encourage and support the diversification of farm income, through initiatives such as the provision of visitor accommodation, including non-standard accommodation and participation in interpreting farming practices (and farm work).
- National Tourism Plans encourage and set standards for non-standard accommodation and encouraging year round tourism.
- It is Failte Ireland's plan to create a promote a brand for the Dublin Mountains similar to Ireland's Ancient East.
- The Dublin Leader programme provides generous grants for non-standard accommodation.

#### **6.1.6 Local Plans**

- The Dun Laoghaire Rathdown Tourism Plan refers to shortfalls in visitor accommodation particularly in the scenic areas.

#### **6.1.7 An Bord Pleanála**

- They have examined some of the Board's decisions in scenic areas and consider the proposed development meets with requirements regarding weather, exposure and shelter, visual exposure, design, safe access, suitable drainage and availability of public transport.

#### **6.1.8 Planning Authority Response**

- The grounds of the appeal do not raise any new issues.

#### **6.1.9 Queries Raised in Planner's Report**

- There has been no time to organise an Arborists' Report or a Visual Impact Analysis, therefore the Board is requested to make a statutory request or the imposition of conditions.
- *Visual Impact Analysis* : The site has been carefully chosen to be within trees and not be visible from the public domain or the mountains.
- *Transportation Report*: Cycle parking can be provided for each unit by way of a timber post located beside each individual unit. The issue of mud can be

addressed by way of condition. The site entrance is via the farm and there is ample space to store construction materials and machinery.

- *Drainage Planning:* A condition can address the EPA compliance. The trail pit location is illustrated on the aerial photo submitted with the planning application. Grease traps can be provided by condition. Commercial laundry is to be provided off site. A duty pump could be installed in the tank. This is a backup pump. Cross section drawing Ref 1325/03/P1 is attached. The percolation area is increased by 20%. A maintenance agreement can be addressed by way of condition.
- They have no access to neighbouring properties to determine the location of their septic tanks, wells, etc All minimum distances are achieved under the current proposal.
- *Parks and Landscape :* The site is not an exposed site. Additional planting can be provided the proposal is rural and does not propose urban features such as lighting or curbs. The overall aim is to create a sense of visitor pods that have been dropped into the unchanged landscape in rural locations.
- The impact of the proposed pods on the trees will be minimal. The construction method for the pods is galvanized metal screw piles in order to minimize damage to the existing root structure.

## 6.2 Planning Authority Response

The planning authority had nothing further to add on appeal.

## 7.0 Assessment

7.1. I have considered the planning application, the appeal file and inspected the subject site. I will consider this appeal under the following headings:

- Material Contravention of the Development Plan
- Principle of the development/ location
- Impact on Residential Amenity/ Visual Impact/ Road Network
- Wastewater treatment

- Other issues

## 7.2 **Material Contravention of the Development Plan**

7.2.1 The planning authority refused the proposed development for one reason which stated the 6No. glamping pods on the site would materially contravene the stated objectives and existing policies and local objectives for the area zoned G. The subject site is located outside of the zoning boundary of Specific Local Objective (SLO) 151 and is therefore not permitted as per section 13.1.5 of the County Development Plan.

7.2.2 In accordance Section 37.2.(b) of the Planning and Development Act 2000, as amended, the Board is restricted to overturning the refusal on the basis of four criteria. In terms of the criteria, the proposal is not of strategic national importance, it is not the subject of Ministerial Guidelines and there has been no precedent created since the adoption of the development plan.

7.2.3 Therefore, I intend examining the proposed development in the context of  
*(ii) there are conflicting objectives in the development plan or the objectives are not clearly stated, insofar as the proposed development is concerned.*

7.2.4 According to the Maps of the Dun Laoghaire Rathdown County Development Plan 2022-28, the subject site is located in a large area zoned **G – To protect and improve high amenity areas.** Chapter 13 of the development plan explains the land zoning objectives in more detail. Caravan/ Camping park holiday is 'Open for Consideration' under the G zoning only in accordance with Specific Local Objective 151 on Maps 12 and 13.

7.2.5 I refer to the mapping associated with subject site and Glencullen. Further south along Ballyedmonduff Road is Glencullen village. The mapping illustrates the Boundary of the Glencullen Local Area Plan. The mapping also includes a large circle around the village, which does not follow any road, settlement or landscape features. It would appear to be a circle drawn on a 1km radius from a centre point in Glencullen. The objective associated with the designated circle is Specific Local Objective 151, which reads as follows:

*To provide for a number of holiday caravan/camping facilities within a 1km radius of the cross roads at Glencullen subject to the following: ensuring that there is not an over*

*proliferation of such facilities, ensuring any proposals do not undermine the overall zoning objective, ensuring proposals do not have a negative impact on the source protection area or sensitive watercourses as identified in the Glencullen Local Area Plan and/or in section 10.2.2.5 of this Plan and ensuring that the development (including any resultant increases in visitor numbers and/or behaviour) does not affect the integrity of the Knocksink Wood Special Area of Conservation. Each facility shall be limited to a total of 10 pitches (combination of pods, glamping, tents, camper vans) and any glamping pods shall be commensurate in size and scale to a tent/camper van so as to avoid any negative visual impact on the landscape.*

There is a vast area zoned G To Protect and Improve High Amenity Area. The Specific Local Objective 151 relates only to a total of 10 pitches (combination of pods, glamping, tents, camper vans) and any glamping pods shall be commensurate in size and scale to a tent/camper van so as to avoid any negative visual impact on the landscape. Then when one examines the area within the SLO 151 circle, it is apparent due to limited length of road, which are the 4 No. roads projecting from Glencullen Cross, and 2 No. cul de sac lanes, and the fact there is a high density of linear development along both sides of the 4 No. roads, the lack of availability for an access and the suitability of a site for such tourist related developments, is in my opinion, severely and unreasonably restricted by this objective. Furthermore, despite the extensive area zoned G, glamping, camping and tents can only be considered within the 1Km circle of the entire area. It is completely unreasonable objective given the potential of the area for such facilities.

7.2.6 Glamping is a portmanteau of 'glamorous' and 'camping'. A variety of glamping accommodations include cabins, pods, treehouses and tents. There is an sense of escapism and adventure associated with glamping. The fact the designation within the Dun Laoghaire Rathdown County Development Plan restricts glamping to within a kilometre of Glencullen village, would suggest to me, the glamping concept is misunderstood or mis-interpreted by this objective.

7.2.7 Upon examining the subject site, it is worth nothing it has a number of unique features which lend itself to a small glamping site. It is located on an elevated site, within a sheep farm amidst a grove of mature trees. The site is accessed from a rugged boreen off Ballyedmonduff Road. As discussed later, the development will not detract from the high visual qualities of the area or negatively impact on the

landscape. The patrons will have the benefit of experiencing this scenic area. From my brief desk investigation, the Glencullen area is devoid of tourist accommodation, with the closest suitable accommodation on par with the scenic qualities of Glencullen is Enniskerry, 4km from the site. Section 8.6 of the CDP recognises the need to promote, protect and enhance recreational use of the Dublin Mountains area. I also refer to this section of the CDP:

**6.4.2.16 Policy Objective E17: Tourism and Recreation**

*It is a Policy Objective to co-operate with the appropriate agencies in promoting sustainable tourism and securing the development of tourist and recreation orientated facilities in the County. Furthermore, the Council will promote the implementation of the Dún Laoghaire-Rathdown Tourism Strategy & Marketing Plan 2017–2022 and any subsequent update thereof.*

**6.4.2.18 Policy Objective E19: Rural Development**

*It is a Policy Objective to facilitate the development of acceptable rural enterprises and to minimise pollution from agricultural and industrial sources by means of development management and water pollution legislation.<sup>7</sup>*

7.2.8 It is my opinion, the site-specific objective SLO 151, conflicts with a number of core policies and objectives in the county development in particular the provision of tourism and recreational facilities directed at the vast potential of the Dublin Mountains area, and rural enterprise objectives directed at limited non-urban and rural areas of Dun Laoghaire Rathdown. The SLO 151 is unrealistic because it restricts all glamping within the extensive G zoned lands to a 1km radius around Glencullen village, which is highly unlikely to be achievable. The proposal complies with the core policies and objectives of the development plan. I consider SLO 151 conflicts with objectives E17 and E19 of the county development plan. The Board can overturn the planning authority's decision to refuse in this instance.

**7.3 Principle of the Development/ Location**

7.3.1 The applicant owns a small sheep farm at their residence in Glencullen. A submission from the local Farm Advisory Service indicates an adviser has been attending the property for over twenty-five years. The proposed development is agri-tourism, and will supplement the farm income, and the wider community.

7.3.2 There are 6No. glamping pods, rectangular in shape inside and on the edge of a small tree grove located within the farm to the rear of the family home. It is accessed by a Right of Way which adjoins the dwelling and the farmyard.

7.3.5 Given the tourism and rural enterprise policies of the development plan, I consider the principle of the development to be acceptable. I note a letter from the Tourism Officer on the planning file which positively embraced the proposed and indicated the glamping pods were a much-needed addition to the tourism infrastructure in the area and supported the planning application. The provision of tourism accommodation in this scenic area where there are a host of activities available in the general area, will benefit the locality economically.

#### **7.4 Impact on Residential Amenity/ Visual Impact/ Road Network**

7.4.1 The proposed 6No. glamping pods have a ground floor area of 15sq.m. which is small in size and include one bedroom each, accommodating 2 No. persons per pod. They are 3.3metres in height. Each pod has a parking space. The site is accessed from an existing Right of way that provides access to the applicant's farmyard and lands west of the site. The site is located within a designated Area of High Amenity, within a tree grove. The area and the subject site are in an elevated location with views across Dublin Bay to the east.

7.4.2 The 6No. pods are laid out in a cluster formation throughout the tree grove. There is an existing roadway going through the site that is to be retained. This roadway currently serves a grassed flat area along the western site boundary where there is machinery stored. The drawings and submission documents submitted with the application are poor in detail and scant on information. The Site Identification Map (Sheet 1) outlines two parcels of land in blue with the subject site outlined in red. The blue outline most likely denotes the landholding and site context. The site layout outlines the adjoining residential development to the east. The pods are positioned sufficiently far away to prevent any loss of privacy associated with the existing dwelling (Photo plate No. 17). In addition, the orientation of the pods is not directed at any dwelling house, therefore no direct overlooking will occur from the pods.

7.4.3 Having regard to the location and access to the glamping pod site from the public road, I consider it is appropriate that the subject site is in close proximity to the farm yard and main dwelling. The proposed development will integrate into the farm

seamlessly, and will become an integral element of the farm. There is a bus stop fronting the site that will bring patrons to more urban areas without using their cars. I do consider the overall development to be car dependent due to its remote rural location.

7.4.4 In terms of visual impact I accept that the said tourist accommodation is very modest in scale and that its visual impact when viewed from the road would be limited.

Although this is a High Amenity Area, I do not consider a Visual Impact Assessment will assist in the assessment of the case because there is very limited scope to view the site from the public road or surrounding area. The units will be discreetly hidden from public view and superimposed into the tree grove area.

7.4.5 Access to the site is via a Right-of-way that currently serves the applicants landholding farmyard and provides access to their dwelling house. The sightlines are acceptable in both directions. The access lane is a narrow boreen, however the length to the site is short. In the event cars meet, there is a setdown area in front of the dwelling that will enable cars to wait rather than reversing onto the public road. (see photo plate 2). The Transportation Office in the planning authority had no objections to the proposed development and recommended a grant of permission subject to cycle stands been provided, and no construction dirt or surface water arising from the proposed development should discharge onto the public road.

## **7.5 Wastewater Treatment**

7.5.1 The planning application was accompanied by a Percolation Test Report. The report indicated the proposal will be served by the public watermain. The groundwater quality in the area is considered to be poor. There are numerous houses down gradient of the proposed development on individual sewage treatment systems. Based on the visual assessment a test area was chosen to maximise separation distances from existing treatment systems. The receiving environment is considered to be sensitive, therefore a high-end system is to be specified. Gravity flow to the chosen system from all six glamping pods with a pumped discharge to a filter system located at the highest gradient of the site.

7.5.2 The proposed treatment system is to cater for a population load of 12No. persons followed by a sump chamber with pumped discharge into a partially raised and tiered soil polishing filter. The Drainage Services Report on the planning file in its report



dated 16<sup>th</sup> of May 2024 stated further information was required. Full compliance with the EPA Waste Treatment Manual for Waste Treatment Systems is required, and to indicate where the trial hole and percolation test was carried out. I note the test holes were indicated on the submission documents of the report. A cross section of the wastewater treatment system and soil polishing filter was submitted on appeal. The other outstanding issues can be addressed by way of condition:

- Location, number and type of grease traps
- Details of the pump to pump the effluent to the polishing filter.
- Details of maintenance of the system

7.5.3 I am satisfied the outstanding issues relating to the sewage treatment system can be dealt with by condition. The relevant Drainage Report had no objection in principle to the system that was designed based on details test results.

## **7.6 Other Issues**

7.6.1 The Parks and Landscape Service wrote a details report on the 1<sup>st</sup> of April 2024. One of the main issues was the application documentation did not include an Arborist Report to assess the impact the proposal will have on the existing tree stock. The pods will be paced on the site using galvanized metal screws to minimise the impact on the existing root structure.

7.6.2 The subject site consists of a small grove of mature trees, photo plates 11,12,19. The trees provide shelter and a pleasing backdrop to the applicants farmyard. I consider the proposed development makes positive use of this otherwise idle plot on the farmyard. The small area will be used to provide agri-tourism without the removal of the trees. The majority of the trees in the grove are evergreen spruce trees, and are not of significant amenity value to the area. A landscaping scheme should also be provided in accordance with the requirements of the Landscape and Parks Department report. The application submission documents lack detail in this regard. The applicants stated on appeal, they did not have sufficient time to have an Arborist Report prepared and would have welcomed a request for further information from the planning authority or the Board in this regard. The trees will have to be assessed for their viability prior to the installation of the pods, and I consider this can be conditioned as part of the permission.

## 8.0 AA Screening

### 8.1. Stage 1 Screening

The planning report refers to an Appropriate Assessment Screening carried out by the planning authority. However, I examined the appeal file and the online planning documentation, and I could find no evidence of a screening report.

8.2 The subject site is not within, adjoin or is in close proximity to a European site. The proposed development comprises the provision of 6 glamping pods and and installation of new packaged wastewater treatment system with a polishing filter.

There is no surface water runoff from the site and collected rainwater is discharged to soak pits on site. Wastewater shall be discharged to the new packaged waste water treatment system and eventually discharged to ground at the rear of the site.

8.3 A summary of European Sites that occur within a possible zone of influence of the proposed development is presented in Table 8.1.

**Table 8.1 : Summary Table of European Sites with a Possible Zone of Influence of the proposed development**

<b>European Site (code)</b>	<b>List of Qualifying Interest</b>	<b>Distance from proposed development</b>	<b>Connections (source, pathway receptor</b>	<b>Considered further in screening Y/N</b>
Wicklow Mtns SAC (002122)	Oligotrophic waters containing very few minerals of sandy plains (Littorelletalia uniflorae) [3110]  Natural dystrophic lakes and ponds [3160]  Northern Atlantic wet heaths with Erica tetralix [4010]	4km west of site	The site is completely outside of the SAC. It is considerable downslope of the European site. Surface water shall be managed on site and wastewater shall be managed through onsite wastewater	N

	<p>European dry heaths [4030]</p> <p>Alpine and Boreal heaths [4060]</p> <p>Calaminarian grasslands of the Violetalia calaminariae [6130]</p> <p>Species-rich Nardus grasslands, on siliceous substrates in mountain areas (and submountain areas, in Continental Europe) [6230]</p> <p>Blanket bogs (* if active bog) [7130]</p> <p>Siliceous scree of the montane to snow levels (Androsacetalia alpinae and Galeopsietalia ladani) [8110]</p> <p>Calcareous rocky slopes with chasmophytic vegetation [8210]</p> <p>Siliceous rocky slopes with</p>		<p>treatment system before been discharged to groundwater. Groundwater is assumed to travel in easterly direction There will be no direct effects as the project footprint is located entirely</p>	
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	<p>chasmophytic vegetation [8220]</p> <p>Old sessile oak woods with Ilex and Blechnum in the British Isles [91A0]</p> <p>Lutra lutra (Otter) [1355]</p>			
Knocksink Wood SAC (00725)	<p>Petrifying springs with tufa formation (Cratoneurion) [7220]</p> <p>Old sessile oak woods with Ilex and Blechnum in the British Isles [91A0]</p> <p>Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae) [91E0]</p>	3km south of site	<p>The site is completely outside of the SAC. It is considerable upslope of the European site. Surface water shall be managed on site and wastewater shall be managed through onsite wastewater treatment system before been discharged to groundwater. Groundwater is assumed to travel in easterly direction There will be no direct effects as the project footprint is located entirely</p>	

8.4 Having considered the nature, scale, and location of the project, I am satisfied that it can be eliminated from further assessment because there is no conceivable risk to any European Site.

The reason for this conclusion is as follows:

- scale and nature of the development
- Location-distance from nearest European site and lack of connections

I conclude that on the basis of objective information, that the proposed development would not have a likely significant effect on any European Site either alone or in combination with other plans or projects. Likely significant effects are excluded and therefore Appropriate Assessment (stage 2) (under Section 177V of the Planning and Development Act 2000) is not required.

## 9.0 Recommendation

I recommend the planning authority's decision to refuse be overturned and the permission be granted for the following reasons and considerations.

## 10.0 Reasons and Considerations

Having regard to:

- Policy Objective E17 in the current Dun Laoghaire Rathdown County Development plan to promote sustainable tourism and securing the development of tourist and recreation orientated facilities in the county;
- Policy Objective E19 in the current Dun Laoghaire Rathdown County Development plan to facilitate the development of acceptable rural enterprises
- The site location within and adjoining a farmyard;
- The design and layout of the units with a grove of trees on the farmstead

It is considered that the proposed development of six glamping pods located within an area zoned as high amenity in the current Dun Laoghaire Rathdown County Development Plan would not impact adversely on the natural heritage or amenities of the area and, subject to the following conditions, would not impact on the public

health or traffic safety of the area. The proposed development would accordingly be in accordance with the proper planning and sustainable development of the area.

## 11.0 Conditions

1. The development shall be carried out and completed in accordance with the plans and particulars lodged with the application as amended by the further plans and particulars submitted on the 27<sup>th</sup> of March 2024, except as may otherwise be required in order to comply with the following conditions. Where such conditions require details to be agreed with the planning authority, the developer shall agree such details in writing with the planning authority prior to commencement of development and the development shall be carried out and completed in accordance with the agreed particulars.

**Reason:** In the interest of clarity.

2. In the event all of the proposed structures become un-used for a period in excess of one year they shall be removed from the site and the site shall be reinstated to agricultural use.

**Reason:** In the interest of clarity, having regard to the temporary nature of the proposed structures.

3. The proposed development shall be used for short term residential use only and no unit shall be let for a period in excess of one month.

**Reason:** In the interest of clarity, having regard to the nature of the proposed development and its unsuitability for long term residential use

### 4. Arboricultural Survey

a) Prior to the commencement of the development the applicant shall submit a comprehensive Arboricultural Survey, comprising a detailed written document along with three drawings/plans.

b) The three plans/drawings required are as follows:

1. Tree Constraints/Survey Plan (impartial plan showing what categories all the trees on site are with the RPA (root protection areas) and their accurate locations and crown shapes on site). All trees are to be tagged and plotted on the site by the Arborist/Arboriculturist.

2. Arboricultural Impacts Assessment Plan (showing the existing trees on site as per the Tree Constraints Plan with the proposed development overlaid on top and with the trees labelled/coded either 'Trees to be retained' or 'Trees to be removed to facilitate development'. Proposed site services are also to be indicated on this drawing.

3. Tree Protection Plan, showing the proposed line of protective tree fencing, with details of the proposed fencing and locations of materials storage and site compounds etc.

All shall be in accordance with, BS 5837: 2012 Trees in relation to design, demolition and construction – Recommendations and at a scale of ideally 1:200, or 1:250 (or maximum 1:500).

c) The written document (Tree Survey document) shall lay out in tables all standard information on the trees surveyed along with any other relevant information as per BS 5837: 2012.

d) An Arboricultural Method Statement section of the written document shall comprise clear and practically achievable measures to be used during the construction period, for the protection and management of all trees and hedges that are to be retained, as shown in the Tree Protection Plan. These recommendations shall show how relevant (and new) techniques such as no-dig works, cellular confinement etc. may allow trees of any category (with an emphasis on categories B and A) to be retained which would otherwise be damaged by the proposed development or be felled to facilitate same, such as at vehicular entrances or

carparking areas. These techniques may reduce or remove any potential damage to the existing tree.

e) The written report and drawings shall be prepared by a qualified Arboriculturist/Arborist. The Arboriculturist's name and arboricultural qualifications must be provided.

f) Date the tree survey was carried out

**Reason:** In the interest of visual amenity.

5. Prior to commencement of development, the developer shall enter into water connection agreements with Uisce Eireann.

**Reason:** In the interest of public health.

6. Prior to the commencement of the development the applicant shall submit to and agree in writing with the planning authority the following details in relation to the proposed sewage treatment plant:

- (a) Full compliance with the requirements of the EPA Waste Treatment Manual for Waste Treatment Systems for Small Communities, Business, Leisure Centres and Hotels 1999, particularly in relation to the seasonal nature of the proposed development.
- (b) The number, location, type (including technical data sheet) and capacity of the proposed grease traps
- (c) Details of the pump(s) proposed to use to pump effluent to the soil polishing filter. If a single pump is proposed, the applicant shall provide details of their plan in the event of pump failure
- (d) Proposals for the maintenance of the wastewater treatment system and grease traps maintenance including frequency of inspection and de-sludging/removal of the FOG by a fully licensed waste disposal haulier.

**Reason:** In the interest of public health.



7. The disposal of surface water, shall comply with the requirements of the planning authority for such works and services.

**Reason:** In the interest of clarity and orderly development.

8. Prior to the commencement of the development the applicant shall submit to the planning authority for approval a Landscape Design Rationale together with comprehensive, detailed Landscape Design and Maintenance Proposals, all prepared by a qualified Landscape Architect, for the written approval of the Parks and Landscape Services.

The proposals shall include: -

1. A Preliminary Landscape Masterplan - with cross-sections (where applicable) - showing all external spaces, including play spaces, and proposed lighting, boundaries, along with any small structures and other hard and soft landscape elements.
2. Outline details of Soft Landscape Design to include a detailed Planting Plan and Planting Schedule –
3. Outline plans and details of Hard Landscape Design for boundary treatments, surfacing, seating, edges, surfaces, and showing civil engineering elements (e.g. retaining structures, existing and proposed underground utilities, services, drainage and ancillary infrastructure as it relates to landscape).

**Reason:** In the interests of visual amenity and to protect the scenic qualities of the area.

9. Details of on-site refuse storage facilities, and arrangements for off-site disposal, for both the construction phase and the operational phase shall be submitted for the written agreement of the planning authority, prior to the commencement of development.

**Reason:** In the interest of clarity and public health.

10. Site development and building works shall be carried out only between the hours of 0800 to 1900 Mondays to Fridays inclusive, between 0800 to 1400 hours on Saturdays and not at all on Sundays and public holidays. Deviation from these times will only be allowed in exceptional circumstances where prior written approval has been received from the planning authority.

**Reason:** In order to safeguard the amenities of property in the vicinity.

11. All public service cables for the development, including electrical and telecommunications cables, shall be located underground throughout the site.

**Reason:** In the interest of visual amenity

12. The developer shall pay to the planning authority a financial contribution in respect of public infrastructure and facilities benefiting development in the area of the planning authority that is provided or intended to be provided by or on behalf of the authority in accordance with the terms of the Development Contribution Scheme made under section 48 of the Planning and Development Act 2000, as amended. The contribution shall be paid prior to commencement of development or in such phased payments as the planning authority may facilitate and shall be subject to any applicable indexation provisions of the Scheme at the time of payment. Details of the application of the terms of the Scheme shall be agreed between the planning authority and the developer or, in default of such agreement, the matter shall be referred to An Bord Pleanála to determine the proper application of the terms of the Scheme.

**Reason:** It is a requirement of the Planning and Development Act 2000, as amended, that a condition requiring a contribution in accordance with the Development Contribution Scheme made under section 48 of the Act be applied to the 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.

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Caryn Coogan  
Planning Inspector

16<sup>th</sup> of May 2025

### Form 1 - EIA Pre-Screening

<b>Case Reference</b>	319936
<b>Proposed Development Summary</b>	6No. glamping pods
<b>Development Address</b>	Stroller's Place, Ballyedmonduff Road, Dublin 18
	<b>In all cases check box /or leave blank</b>
<b>1. Does the proposed development come within the definition of a 'project' for the purposes of EIA?</b>  (For the purposes of the Directive, "Project" means: - The execution of construction works or of other installations or schemes,  - Other interventions in the natural surroundings and landscape including those involving the extraction of mineral resources)	<input checked="" type="checkbox"/> Yes, it is a 'Project'. Proceed to Q2.
	<input type="checkbox"/> No, No further action required.
<b>2. Is the proposed development of a CLASS specified in Part 1, Schedule 5 of the Planning and Development Regulations 2001 (as amended)?</b>	
<input type="checkbox"/> Yes, it is a Class specified in Part 1.  <b>EIA is mandatory. No Screening required. EIAR to be requested. Discuss with ADP.</b>	Schedule 5 Part 2 Class 10 (b) (i) Construction of more than 500 dwelling units
<input type="checkbox"/> No, it is not a Class specified in Part 1. Proceed to Q3	
<b>3. Is the proposed development of a CLASS specified in Part 2, Schedule 5, Planning and Development Regulations 2001 (as amended) OR a prescribed type of proposed road development under Article 8 of Roads Regulations 1994, AND does it meet/exceed the thresholds?</b>	
<input checked="" type="checkbox"/> No, the development is not of a Class Specified in Part 2, Schedule 5 or a prescribed type of proposed road	

<p>development under Article 8 of the Roads Regulations, 1994.</p> <p><b>No Screening required.</b></p>	
<p><input type="checkbox"/> Yes, the proposed development is of a Class and meets/exceeds the threshold.</p> <p><b>EIA is Mandatory. No Screening Required</b></p>	<p><b>State the Class and state the relevant threshold</b></p>
<p><input type="checkbox"/> Yes, the proposed development is of a Class but is sub-threshold.</p> <p><b>Preliminary examination required. (Form 2)</b></p> <p><b>OR</b></p> <p><b>If Schedule 7A information submitted proceed to Q4. (Form 3 Required)</b></p>	<p><b>State the Class and state the relevant threshold</b></p>

4. Has Schedule 7A information been submitted AND is the development a Class of Development for the purposes of the EIA Directive (as identified in Q3)?	
<p>No <input checked="" type="checkbox"/></p>	<p><b>Pre-screening determination conclusion remains as above (Q1 to Q3)</b></p>

## Form 2 - EIA Preliminary Examination

<b>Case Reference</b>	ABP 319936-24
<b>Proposed Development Summary</b>	6 Glamping Pods
<b>Development Address</b>	Stroller's Place, Ballyedmonduff Road, Dublin 18
<b>This preliminary examination should be read with, and in the light of, the rest of the Inspector's Report attached herewith.</b>	
<b>Characteristics of proposed development</b>  (In particular, the size, design, cumulation with existing/ proposed development, nature of demolition works, use of natural resources, production of waste, pollution and nuisance, risk of accidents/disasters and to human health).	The proposed development is on a 0.33ha site. The development is 6No. glamping pods within a sheep farm to the rear of the farmhouse and farm yard within a grove of mature trees on the landholding. The site is on a steep gradient and the development does not require demolition works, does not require the use of substantial natural resources, or give rise to significant risk of pollution or nuisance. The development, by virtue of its temporary nature, does not pose a risk of major accident and/or disaster, or is vulnerable to climate change, or the amenities of the area.
<b>Location of development</b>  (The environmental sensitivity of geographical areas likely to be affected by the development in particular existing and approved land use, abundance/capacity of natural resources, absorption capacity of natural environment e.g. wetland, coastal zones, nature reserves, European sites, densely populated areas, landscapes, sites of historic, cultural or archaeological significance).	The site is located on the eastern foothills of the Wicklow mountains close to Glencullen village in an area with a high concentration of urban generated housing.  The development will be low impact and low profile within a small tree grove in an area that has high scenic qualities.  The landscape is protected under the policies of the county development plan.  The site is not in close proximity to European sites or Natural Heritage Areas.
<b>Types and characteristics of potential impacts</b>  (Likely significant effects on environmental parameters, magnitude and spatial extent, nature of impact, transboundary, intensity and complexity,	Having regard to the nature of the proposed development, its location removed from sensitive habitats/features, likely limited magnitude and spatial extent of effects, and absence of in combination effects, there is no potential for significant effects on the environmental factors listed in section 171A of the Act..

duration, cumulative effects and opportunities for mitigation).	
<b>Conclusion</b>	
<b>Likelihood of Significant Effects</b>	<b>Conclusion in respect of EIA</b>
There is no real likelihood of significant effects on the environment.	<p><b>EIA is not required.</b></p> <p><b>Include the following paragraph under EIA Screening (a separate heading) in the Inspectors report.</b></p> <p>The proposed development has been subject to preliminary examination for environmental impact assessment (refer to Form 1 and Form 2 in Appendices of this report). Having regard to the characteristics and location of the proposed development and the types and characteristics of potential impacts, it is considered that there is no real likelihood of significant effects on the environment. The proposed development, therefore, does not trigger a requirement for environmental impact assessment screening and an EIAR is not required.</p>

**Inspector:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**DP/ADP:** \_\_\_\_\_ **Date:** \_\_\_\_\_

(only where Schedule 7A information or EIAR required)