



An  
Coimisiún  
Pleanála

## Inspector's Addendum Report

**ACP-323154-25**

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### Development

Retention of the amended site boundaries as granted under planning permission Ref P.04/1624. Retention of an amended domestic wastewater treatment system installed to that approved under planning permission Ref. P.04/1624. Retention of the as built flat roof dining room extension on the north-west elevation of the dwelling.

### Location

Corglancey, Dromahair, Co. Leitrim

### Planning Authority

Leitrim County Council

### Planning Authority Reg. Ref.

2560109

### Applicant(s)

Greg & Deirdre Kelly

### Type of Application

Retention Permission

### Planning Authority Decision

Grant

<b>Type of Appeal</b>	Third Party
<b>Appellant</b>	Bronagh Crehan
<b>Observer(s)</b>	None
<b>Date of Site Inspection</b>	8 October 2025
<b>Inspector</b>	Paul Christy

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**Appendix B** – Form 1: Water Framework Directive Screening

## 1.0 Introduction

1.1. The submissions on file and my Inspector's report of 13<sup>th</sup> November, 2025 were considered at a meeting of the Commission held on 27<sup>th</sup> November, 2025. My report included a recommendation to refuse the proposed wastewater treatment system inclusive of percolation area installed to that approved under planning permission Ref. P.04/1624 for two reasons:

1. That the safe disposal of domestic effluent following treatment could not be guaranteed having regard to:
  - a. deficiencies in the Site Characterisation Report of 2004 when compared to the requirements of the 2021 Code of Practice; and
  - b.) changes in circumstance between the time that the 2004 Site Characterisation Report was prepared and the present day.
2. Having regard to the conclusion as set out in reason No. 1, I was not satisfied that the proposed development would not result in a risk of deterioration of groundwater quality

1.2. At the aforementioned meeting of the Commission, the Commission decided to defer consideration of this case and to issue a Section 132 Notice to the Applicants requiring them to submit the following details relating to the change in the location of the proposed wastewater treatment system since the previous planning permission was granted (Ref. P04/1624):

- An updated Site Characterisation Form and Report to take account of the following:
  - ~ Design of the dwelling (number of bedrooms) and the current/proposed location, site boundaries and design of the wastewater treatment system;
  - ~ EPA Code of Practice Domestic Waste Water Treatment Systems, population equivalent 10 or less (2021);
  - ~ trial hole data applicable to the proposed location of the treatment systems;

~ up to date waterbody status – groundwater (category and vulnerability) and surface water proximity and status.

- 1.3. The Section 132 Notice issued to the Applicant on 4<sup>th</sup> December, 2025 with a deadline of 12<sup>th</sup> January, 2026 for the submission of a reply. The Applicant’s Agent submitted a reply on 12<sup>th</sup> January, 2026.

## 2.0 Assessment

- 2.1. The Agent’s submission of 12<sup>th</sup> January, 2026 included an updated Site Characterisation Form and Report. The Section 132 Notice issued by the Commission stipulated that the updated Form and Report were to take account of four items. I consider each of these in the table below.

Section 132 Notice Item	Assessment
Design of the dwelling (number of bedrooms) and the current/proposed location, site boundaries and design of the wastewater treatment system	<p>The correct no. of bedrooms (five) is stated.</p> <p>The location of the wastewater treatment system is identified consistently on both the Site Layout Plan submitted with the planning application, and the layout plan submitted with the Site Characterisation Form in response to the Section 132 Notice. The identified location is as per that noted at my site inspection.</p> <p>The wastewater treatment system as constructed (ie. a wastewater treatment system, coco filter with distribution pipes onto a distribution gravel layer on 105m<sup>2</sup>) is generally as per that recommended in the Site Characterisation Form and Report.</p>
~ EPA Code of Practice Domestic Waste Water Treatment Systems, population equivalent 10 or less (2021);	The Form and Report follows the template as set out in the Code of Practice.
~ Trial hole data applicable to the proposed location of the treatment systems;	The layout plan submitted with the Site Characterisation Form identifies a trial hole location in close proximity to the location of the distribution pipes. This methodology ie.

	conducting trial holes close to, but not at, the intended percolation/distribution pipe area is as recommended in the Code of Practice (Section 5.4.2 refers).
~ Up-to-date waterbody status – groundwater (category and vulnerability) and surface water proximity and status.	<p>Groundwater: The relevant groundwater (ie. the Killarga South groundwater body) is not identified on the Form (at Section 2.0) or in the covering commentary.</p> <p>Surface Water: The response to 'Watercourse/Streams at Section 3.0 advises that they are denoted on the attached layout. However, there is no such notation on the attached layout. A subsequent response does note Drainage ditches on the boundaries of the site.</p>

- 2.2. Aside from the absence of information in relation to groundwater and surface waters, the submitted Form is largely complete in accordance with the requirements of the EPA Code of Practice. The conclusions in relation to the system selected are generally in line with recommended solution at Tables 6.3 and 6.4 of the Code of Practice having regard to the findings of the trial hole and percolation tests.
- 2.3. Specifically in relation to the Killarga groundwater, I note from the catchments.ie website that the water's 'Overall Status' is 'Good' and, in terms of risk, is categorised at being 'Not at risk'. Having regard to the details contained in the remainder of the Site Characterisation Form and to the recommendations contained therein for the tertiary treatment system as now constructed on-site, and to the scale of the proposed development relative to the scale of the groundwater (53.85km<sup>2</sup> in area), I am satisfied that there is minimal risk to the groundwater and Regional aquifer.
- 2.4. With regards to risks to surface waters, I note that it is proposed to discharge treated waters to ground waters. Having regard to this proposed arrangement and to the distance of the existing system on-site to the nearest ditch to the west of the site ie. c.15m, I am satisfied that there is minimal risk to the ditch and downstream watercourses.

### **3.0 Water Framework Directive Screening**

3.1. In my previous report, having considered the nature, scale and location of the project, I concluded as follows:

- In relation to the Killanummery River\_010 river system I was satisfied that it could be eliminated from further assessment because there was no conceivable risk either qualitatively or quantitatively. I reached this conclusion on the basis that the only potential risk to this River system was from the proposed effluent treatment plant and percolation area. However, this system was designed to discharge treated effluent to ground waters beneath the system and not to surface waters. Furthermore, the proposed system was some 18m-19m away from the nearest stream. This was significantly in excess of the required minimum distance of 10m as set out in the EPA Code of Practice.
- In relation to the Killarga South IE\_WE\_G\_0056 groundwater body and 'Regionally important Aquifer – karstified, I set out in detail why the Site Characterisation Report submitted with the 2004 application could not now be relied upon as evidence to support the proposed treatment system and percolation area. As the proposed system included discharge to ground waters, and as the evidence to support the suitability of this system could not be relied upon, potential risk to this body, either qualitatively or quantitatively or on a temporary or permanent basis, could not be eliminated.

3.2. In Section 2 above, I set out why I am now satisfied that there is minimal risk to the groundwater and Regional aquifer and, therefore, that my previous concerns have been adequately addressed.

### **4.0 AA Screening**

4.1. In my previous report, having considered the nature, scale and location of the project, I was satisfied that the proposed development could be eliminated from further assessment because there was no conceivable risk to any European Site.

The reasons for this conclusion were as follows:

- the nature of the works: extended site boundaries; amended domestic wastewater treatment system; and a minor extension to the side of a dwelling;
- the distance of the site from the nearest European site and the remote chance of any connections between the two, notwithstanding that the Killanumurrey River to the west of the site does flow towards the SAC.

4.2. The submitted revised information does not change my previous position and I again conclude that on the basis of objective information, 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.

## **5.0 Recommendation**

5.1. I recommend that retention permission for the development be granted, subject to conditions for the reasons and considerations as set out below.

## **6.0 Reasons and Considerations**

Having regard to the provisions of the Leitrim County Development Plan 2023-2029, and to the nature and scale of the proposed development, it is considered that, subject to compliance with the conditions set out below, the proposed amended site boundaries and consequent extended site curtilage, and the as-built flat roof dining room are sympathetic to the rural setting of the subject site and otherwise give rise to no concerns in terms of potential impacts for the environment, public health, traffic safety or the amenities of adjacent properties.

Having regard to the Site Characterisation Report submitted to the Commission on 12<sup>th</sup> January, 2026, it is further considered that the provisions within the 'Code of Practice – Domestic Waste Water Treatment Systems , Population Equivalent 10 or Less (Environmental Protection Agency, 2021) have been complied with, and that

expert and verifiable evidence including a positive site suitability assessment by an appropriately trained and qualified assessor has been provided. The requirements of the Sustainable Rural Housing Guidelines (Section 4.5); and the Leitrim County Development Plan 2023-2029 (Section 13.17: 'Infrastructure, Flooding and Environmental Management', Chapter 13: 'Development Management Standards'), therefore, have also been met.

### Conditions

1. The development shall be carried out in accordance with the plans and particulars lodged with the application.

Reason: In the interests of clarity.

2. a. The effluent treatment and disposal system shall be maintained in accordance with the details submitted to the Commission on 12<sup>th</sup> January, 2026, and in accordance with the requirements of the document entitled 'Code of Practice – Wastewater Treatment and Disposal Systems Serving Single Houses (p.e. ≤ 10)', Environmental Protection Agency, 2021.

Arrangements in relation to the ongoing maintenance of the system shall be submitted to, and agreed in writing with, the local planning authority prior to the first occupation of the dwelling.

- b. Within three months of the first occupation of the dwelling, the developer shall submit a report from a suitably qualified person with professional indemnity insurance certifying that the effluent treatment system has been commissioned in accordance with the approved details and is working in a satisfactory manner in accordance with the standards set out in the EPA document.

Reason: In the interests of public health.

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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Paul Christy  
Planning Inspector

2<sup>nd</sup> February 2026

## Appendix A: Form 1 EIA Pre-Screening

<b>Case Reference</b>	323154-25
<b>Proposed Development Summary</b>	Retention of the amended site boundaries. Retention of an amended domestic wastewater treatment system. Retention of the as built flat roof dining room extension on the north-west elevation of the dwelling.
<b>Development Address</b>	Corglancey, Dromahair, Co. Leitrim
<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 <u>Part 1</u>, 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>	<b>State the Class here</b>
<input checked="" type="checkbox"/> No, it is not a Class specified in Part 1. Proceed to Q3	

<p><b>3. Is the proposed development of a CLASS specified in <u>Part 2, Schedule 5, Planning and Development Regulations 2001 (as amended)</u> OR a prescribed type of proposed road development under Article 8 of Roads Regulations 1994, AND does it meet/exceed the thresholds?</b></p>	
<p>X No, the development is not of a Class Specified in Part 2, Schedule 5 or a prescribed type of proposed road 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>
<p><b>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)?</b></p>	
<p>No X</p>	<p><b>Pre-screening determination conclusion remains as above (Q1 to Q3)</b></p>

Inspector: Paul Christy Date: 2<sup>nd</sup> February 2026

## Appendix B: Form 1 Water Framework Directive Scoping

Table 2 WFD: Scoping			
Step 1: Nature of the Project, the Site and Locality			
<b>An Comm. Pleanála ref. no.</b>	323154-25	<b>Townland, address</b>	Corglancey, Dromahair, Co. Leitrim
<b>Description of project</b>		Retention of the extended site boundaries; retention of an amended domestic wastewater treatment system; and retention of a minor extension to the side of the dwelling	
<b>Brief site description, relevant to WFD Screening,</b>		<p>The subject site is in a remote rural area. The site and lands in the immediate vicinity are flat. The soil and subsoil are both categorised as 'peat' on the catchments.ie website.</p> <p>A minor stream (not identified on catchments.ie) flows along the north-western boundary of the site towards the public road. This minor stream then continues northwards alongside the public road.</p> <p>The Killanummery River_010 river system is a significant feature in the wider locality and is comprised of several sections. The nearest sections to the subject site are located to the south-west and north-east. The section to the south-west is at generally the same levels as the subject site and is located c.125m to the west of the site front boundary, and c.175m to the west of the proposed treatment plant and percolation area. There are two minor public roads between the site and this section of the river network generally running in a north-south direction. The section to the north-east is located c.400m away from the proposed treatment plant and percolation area and at a higher level. The latest monitoring status available for the river (SW 2019-2024) is 'moderate' and the WFD risk status is 'Not at risk'. No 'Pressures and Activities' are identified.</p> <p>The site lies within the area of the Killarga South IE_WE_G_0056 groundwater body. This groundwater covers a 53.85km<sup>2</sup>-wide area. The groundwater status at the site is 'Good' and no 'Pressures and Activities' are identified.</p> <p>The site also lies within an area identified as 'Regionally important Aquifer – karstified (refer Water, Land &amp; Soil Tab/Hydrogeology/GSI Bedrock Aquifer) on the EPA's catchments.ie website .</p>	

	There is no identified flood risk at this site.					
<b>Proposed surface water details</b>	Discharge to soakaway (nb. the soakaway, whilst identified on the submitted site layout, is not referenced in the development description submitted as part of the application).					
<b>Proposed water supply source &amp; available capacity</b>	Public mains supply.					
<b>Proposed wastewater treatment system &amp; available capacity, other issues</b>	Proposed wastewater treatment system and percolation area.					
<b>Others?</b>						
<b>Step 2: Identification of relevant water bodies and Step 3: S-P-R connection</b>						
<b>Identified water body</b>	<b>Distance to (m)</b>	<b>Water body name(s) (code)</b>	<b>WFD Status</b>	<b>Risk of not achieving WFD Objective e.g.at risk, review, not at risk</b>	<b>Identified pressures on that water body</b>	<b>Pathway linkage to water feature (e.g. surface run-off, drainage, groundwater)</b>
<b>River</b>	125m from roadside site boundary; 175m from treatment plant and percolation area.	Killanummery River_010	Moderate	Not at risk	None	Although neither mapped on catchments.ie, nor discernible from my site inspection, it is possible that the north-western boundary stream/minor roadside stream to the north-west of the site may flow towards the Killanummery River.
<b>Ground water/ Regionally important Aquifer – karstified</b>	n/a	Killarga South IE_WE_G_0056		Not at risk	None	Discharge of effluent waters to groundwater.
<b>Step 4: Detailed description of any component of the development or activity that may cause a risk of not achieving the WFD Objectives having regard to the S-P-R linkage.</b>						
<b>CONSTRUCTION PHASE</b>						

No.	Component	Water body receptor (EPA Code)	Pathway (existing and new)	Potential for impact/ what is the possible impact	Screen. Stage Mitigation Measure*	Residual Risk (yes/no) Detail	Determination ** to proceed to Stage 2. Is there a risk to the water environment? (if 'screened' in or 'uncertain' proceed to Stage 2.
1.	Treatment plant and perc. area	Killarga South IE_WE_G_0056 (Ground water)	Leakage to ground water	Minor (having regard to Site Characterisation Report submitted to the Commission on 12 <sup>th</sup> January, 2026).	n/a	No	No
2.	Treatment plant and perc. area	Killanum mery River_010	(Potential) discharge to stream along n/w boundary of site, and on to River	Low (having regard to 18m-20m distance from proposed wwtp and percolation area to stream on n/w boundary). Standard construction management measures would also be likely to mitigate such potential impacts.	n/a	No	No
3.	Extended site boundary/ side extension	Killarga South IE_WE_G_0056 (Ground water)	Leakage to ground Water (side extension only)	Low (having regard to area of Ground water). Discharge of siltation.	n/a	No	No
4.	Extended site boundary/ side extension	Killanum mery River_010	(Potential) discharge to stream along n/w boundary	Low (having regard to 23m distance of proposed extension to	n/a	No	No

			of site, and on to River	stream on n/w boundary. Standard construction management measures would also be likely to mitigate such potential impacts			
<b>OPERATIONAL PHASE</b>							
1.	Treatment plant and perc. area	Killarga South IE_WE_G_0056 (Ground water)	Discharge of effluent waters to ground water.	Minor (having regard to Site Characterisation Report submitted to the Commission on 12 <sup>th</sup> January, 2026).	n/a	No	n/a
<b>DECOMMISSIONING PHASE</b>							
1.	Treatment plant and perc. area	Killarga South IE_WE_G_0056	Discharge of effluent waters to groundwater.	Minor (having regard to Site Characterisation Report submitted to the Commission on 12 <sup>th</sup> January, 2026).	n/a	No	n/a

**Inspector: Paul Christy    Date: 2<sup>nd</sup> February 2025**