



An  
Coimisiún  
Pleanála

## Inspector's Report ACP-323240-25

<b>Development</b>	Construction of 5 glamping pods with all associated site works
<b>Location</b>	A site of 0.36 hectares at Dysert, Ardmore, Co. Waterford
<b>Planning Authority</b>	Waterford City and County Council
<b>Planning Authority Reg. Ref.</b>	2560318
<b>Applicant(s)</b>	David and Laura Mulcahy
<b>Type of Application</b>	Permission
<b>Planning Authority Decision</b>	Refuse Permission
<b>Type of Appeal</b>	First Party
<b>Appellant(s)</b>	David and Laura Mulcahy
<b>Observer(s)</b>	John King Patrick Cockburn Andrew Cockburn Janet Montefiore Richard Lincoln Katie Lincoln Gabrielle Humphreys

**Date of Site Inspection**

26<sup>th</sup> September 2025

**Inspector**

Matthew McRedmond

## Contents

1.0 Site Location and Description .....	4
2.0 Proposed Development .....	4
3.0 Planning Authority Decision .....	4
3.1. Decision .....	4
3.2. Planning Authority Reports .....	5
3.3. Prescribed Bodies .....	7
3.4. Third Party Observations .....	7
4.0 Planning History .....	8
5.0 Policy Context .....	9
5.1. Waterford City and County Development Plan 2022-2024 .....	9
5.2. Natural Heritage Designations .....	9
5.3. EIA Screening .....	10
6.0 The Appeal .....	10
6.1. Grounds of Appeal .....	10
6.2. Planning Authority Response .....	13
6.3. Observations .....	13
7.0 Assessment .....	14
8.0 AA Screening .....	21
9.0 Water framework Directive .....	22
10.0 Recommendation .....	22
11.0 Reasons and Considerations .....	22
Appendix 1 – Form 1: EIA Pre-Screening & Preliminary Examination	
Appendix 2 – Form 2: Appropriate Assessment	
Appendix 3 – Water Framework Assessment	

## 1.0 Site Location and Description

- 1.1. The subject site is located at Dysart, Ardmore, Co. Waterford. The site is located on agricultural land to the southeast of Ardmore Village, within Ardmore Head and adjacent to the Ardmore Cliff Walk to the east. The site is accessed via local road L2101, is 0.36ha in area and is generally rectangular in shape. Detached residential dwellings are located to the north along the access road and agricultural land is located to the south.

## 2.0 Proposed Development

- 2.1. The proposed development consists of 5no. glamping pods, a caretaker storage unit, 5no. car parking spaces and all associated site works.

## 3.0 Planning Authority Decision

### 3.1. Decision

- 3.1.1. On the 7<sup>th</sup> July 2025, Waterford City and County Council refused permission for the proposed development for the following 3no. reasons:

1. *The site location is removed from a designated settlement as per the settlement hierarchy contained in the Waterford City & County Development Plan 2022-2028. Tourism Policy Objectives 'ECON 24' and 'ECON 25' of the Waterford City & County Development Plan 2022-2028 relate to proposals for tourist accommodation including glamping and camping sites and seek to direct such accommodation to designated settlements and stipulates that a development shall comply with one of a number of stated criteria. Having regard to the site location it is the opinion of the Planning Authority that the proposed development would be contrary to Policy Objective ECON 24 and ECON 25 of the Waterford City & County Development Plan 2022-2028. The proposed development, at this location, would result in a haphazard, piecemeal and unsustainable form of development in a scenic rural area and would contribute to the encroachment of random rural development in the area and would undermine the settlement strategy and tourism policy*

*objectives as set out in the Waterford City & County Development Plan 2022-2028. The proposed development would, therefore, set an undesirable precedent for similar type development and be contrary to the proper planning and sustainable development of the area.*

- 2. Given that the site is situated within a 'Most Sensitive' Scenic Classification in the Landscape and Seascape Character Assessment as per the Waterford City & County Development Plan 2022-2028 and the site is elevated and exposed on a prominent coastal position, the Planning Authority considers the proposed development would set an undesirable precedent that would be detrimental to the high scenic quality of the area and would be contrary to Policy Objectives L 02 and C & M 05 of the Waterford City & County Development Plan 2022-2028 regarding the protection of the landscape character and scenic values of visually vulnerable landscapes. The proposed development would, therefore, set an undesirable precedent for similar type development and be contrary to the proper planning and sustainable development of the area.*
- 3. Given that the site is bounded by agricultural lands and coastline and is situated at the end of a cul-de-sac serving a rural residential community, removed from the village, the Planning Authority considers that the proposed development would conflict with and materially and negatively affect the residential and rural amenities and character of the area and would set an undesirable precedent for further such development. The proposed development would, therefore, set an undesirable precedent for similar type development and be contrary to the proper planning and sustainable development of the area.*

## **3.2. Planning Authority Reports**

### **3.2.1. Planning Reports**

The Local Authority Planner had regard to the material submitted with the application, the locational context of the site, national and local planning policy, the referral responses received, and submissions made on the application. Their assessment included the following:

- The Development proposed includes charred timber wall finish and sedum roofs that would assist in assimilating the pods into the landscape and mitigating visual impacts.
- The eastern boundary includes a steep drop to the cliff walk, which also serves to screen views of the site and proposed development. The eastern site elevation drawing does present a cumulative visual impact, however.
- Sightlines are not illustrated to the nearside road edge. Sufficient legal interest in the private access road has not been provided by the applicant. This issue in relation to rights of way would require resolution for the application to proceed.
- The principle of development on agricultural zoned land is not supported and would represent a haphazard and piecemeal form of development outside the Ardmore Settlement Boundary, existing tourist facilities in more central locations and Objective ADD013 that identifies other locations for tourism development in Ardmore.
- Adequate justification for the proposed location has not been provided, and the proposal would disrupt the scenic and quiet characteristics of this landscape setting. The open nature of the northern boundary could also lead to residential amenity impacts on properties to the north.
- Concern that the proposal would impact the rural amenity and character of the area, would set an undesirable precedent, and would have a negative visual impact on this 'Most Sensitive' Scenic classification, contrary to Policy Objectives L 02 and C&M 05 of the CDP.
- Further concern that the proposed development is inconsistent with the relevant Tourism Policy Objective ECON 25. Proposal is not located within or adjacent to an existing settlement, that it hasn't demonstrated the provision of safe pedestrian links to the settlement, that it doesn't provide existing services to tourists. Visual impacts and land use zoning are not appropriate. The car based nature of the proposal is not supported at this rural location and would have an unacceptable impact on rural lands.

- Connections to water and wastewater appear to be feasible. Details in relation to connections to the public main via a private sewer, and consent to do so, as raised in submissions, should be confirmed in writing by the applicant.
- Refusal of permission is recommended for the reasons outlined.

#### 3.2.2. Other Technical Reports

- Heritage – Proposed development will not give rise to significant impacts on Ardmore Head SAC. Concur with findings of submitted AA Screening Report. Noted that site is in ‘most sensitive’ landscape with limited ability to absorb new development. Policies Econ 25 – location of camping sites, and L02 – protecting the landscape and seascape are noted. Recommended refusal of permission.

### 3.3. Prescribed Bodies

- #### 3.3.1. No submissions on file from prescribed bodies.

### 3.4. Third Party Observations

- #### 3.4.1. A number of submissions were made in relation to this application. The main issues raised can be summarised as follows:

- Commercial proposal is outside the boundaries of Ardmore village, which is contrary to the Development Plan zoning and objectives (including ADD013 that indicates a location in Ardmore for such proposals).
- Development of proposed glamping pods will undermine the attractiveness and scenic quality of the cliff walk and Ardmore Head SAC. Noted the site is in a ‘most sensitive’ location at a headland and would set an undesirable precedent for further development, undermining the tourism attraction of Ardmore. Environmental impacts on wildlife, nesting and migrating birds etc. should be considered.
- Red listed Kittiwake birds likely to be impacted by the proposal by bringing more light, noise and disturbance to the area. Findings of appropriate assessment and ecological impact assessment are challenged in this regard

as the leisure and recreation use is listed as a potential impact for vegetated sea cliffs.

- Proposal will draw visitors away from the village and no guarantee would boost local economy.
- The access road is not suitable, would detract from residential amenity and lead to road traffic safety concerns. No consent to use private road. Increased footfall will lead to a strain on infrastructure and services, with no footpaths on proposed access roads.
- Tourist accommodation should not come at the expense of local housing, which was refused previously at the subject site.
- Sufficient tourist accommodation already in Ardmore.
- No public sewer or water access to the site. No consent to provide access to private sewer.
- No on-site security to control noise and impacts of visitors, anti-social behaviour, including risk of fire.
- Proposed landscaping will not mitigate the visual impacts of the proposal.
- The residential property to the north is not separated by a field as submitted by the applicant. The proposal will have a direct impact on this property and residential amenity of other properties to the north.
- No overriding public benefit to the proposal put forward.

## 4.0 Planning History

- 4.1.1. **WCCC Ref. 22/69:** Planning permission refused for a single dwelling at the subject site. The proposal was refused as the site was zoned greenbelt and the location adjoining the Ardmore Head SAC, leading to an undesirable pattern of development that would seriously detract from the rural amenity and visual attractiveness of the area.



## 5.0 Policy Context

### 5.1. Waterford City and County Development Plan 2022-2024

#### Zoning

- 5.1.1. The subject site is located outside of the Ardmore settlement boundary so is therefore considered to be zoned 'Agriculture – To provide for the development of agriculture and to protect and improve rural amenity'.

#### Relevant Policies and Objectives

- 5.1.2. **Econ 24** – Supports the development of tourism accommodation types at appropriate locations within the county. Generally, to be located within towns and villages unless justified to the satisfaction of the Planning Authority.
- 5.1.3. **Econ 25** – Relates to camping and campervan sites, with a requirement that no adverse impacts on environmental and landscape quality/amenity arise.
- 5.1.4. **Objective L02** – Protect the landscape and natural assets of the County by ensuring that proposed developments do not detrimentally impact on the character, integrity, distinctiveness or scenic value of their area and ensuring that such proposals are not unduly visually obtrusive in the landscape, in particular, in or adjacent to the uplands, along river corridors, coastal or other distinctive landscape character units.
- 5.1.5. **Objective C&M 05** – Scenic Coastal Areas - To protect the scenic value of Waterford's Coastal Zone including landward and seaward views and continuous views along the coastline and manage development so it will not materially detract from the visual amenity of the coast.
- 5.1.6. **Objective ADDO13** – Objective to support tourism including pods on lands to southwest of Bayside Cottage (northeast of Ardmore village core).

### 5.2. Natural Heritage Designations

- 5.2.1. The following designated sites are within 15km of the appeal site:
- Adjoining Ardmore Head SAC,
  - 3.5Km southwest of Helvick Head to Ballyquin SPA,

- 7Km southeast of Blackwater Estuary SPA,
- 7Km south east of Blackwater River SAC,
- 12km northeast of Ballymacoda (Clonpriest and Pilmore) SAC,
- 11Km north east of Ballymocoda Bay SPA

### **5.3. EIA Screening**

- 5.3.1. 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**

A First-Party Appeal has been submitted against the decision made by Waterford City and County Council to refuse permission for the proposed development.

The grounds of appeal can be summarised as follows:

- Objective ECON 25 as referenced in the reason for refusal No. 1 does not apply to the subject proposal as it is not a proposal for a camping or campervan site. Nevertheless, compliance with ECON 24 and 25 are submitted in the appeal as follows:
- The proposal offers an alternative tourist accommodation type, within cycling distance of Ardmore and would assist in the promotion of Waterford as a Tourism location that is also linked to St. Declan's Way adjacent to the site.

- The biodiversity zone will further promote the connection to nature for visitors to the site. Dwell times will increase and access to the recreational and leisure facilities of Ardmore will improve economic potential.
- 1no. of the 5no. pods has been designed in accordance with universal design principles.
- The submitted Ecological Impact Assessment concluded the proposal will have no significant negative impacts on protected habitats or species, nor will it have any impact on Natura 2000 sites.
- Broaden the availability of accommodation types at a unique location to enhance the reputation of Waterford.
- Appeal submits a number of examples of glamping permitted close to existing residential in County Waterford including Raven's Cottage Glamping, Harney's Cross (ref. 17/901), Comeragh Pods (ref. 21/119) and Glendalough Glamping (Wicklow CC Ref. 15/1291). It is noted Glendalough Glamping was permitted outside of the settlement boundary in an area of outstanding natural beauty. A similar logic for the approval of the subject proposal could be applied.
- The proposed pods have been architecturally designed to assimilate into the landscape and offer a high-quality standard of finishes.
- In relation to reason for refusal no. 2, although it is accepted the site is located within the 'Most sensitive' zone as defined in the Landscape Character Assessment of the County Development Plan, proposals such as the subject application should not be blanketly prohibited. High quality design and level of impact should be considered.
- 'Flag Assessment' showing a photographic survey with flags representing the locations and heights of the proposed pods was undertaken and submitted in the appeal to illustrate the subject proposal will not be visible from the majority of viewpoints in the surrounding area.
- The submitted east elevation does not provide an accurate representation of how the pods will look in reality. They will be screened by the convex contours of the landscape, will be staggered to break up the view of each, and will be

set against a backdrop of existing residential to the north. Due to the fall off in levels from the cliff top, it is submitted the proposal would not be visible from the sea.

- The proposal does not contravene objectives C&M 05 and L02 as it does not undermine landward views, seaward views or continuous views along the coastline. The proposal does not interfere with any 'scenic routes' or 'protected views' and therefore does not contravene objective L02.
- The 'open coast' sea area is noted as a distance of up to 5km that is 'less sensitive to change' and is indirectly related to the subject site. While this policy partially conflicts with other provisions of the development plan, the subject proposal is of such a modest scale, with high quality design and materials, and at a location where development already exists, that it will not have an impact.
- In relation to reason for refusal no. 3, various uses can co-exist and can complement each other. A variety of uses other than 'rural residential' exist in the area including tourist accommodation, recreation uses and sports amenities, and is thereby more robust to new and expanded uses and developments.
- While the proposal is in a quiet and peaceful area, the future visitors would be more likely to respect and uphold this character.
- Separation distances to properties to the north is at least 50m, which exceeds minimum standards of 16m. The proposal is designed to look away from properties to the north and towards the views to the east. A condition requiring a boundary treatment plan to the north would be acceptable to the applicant.
- The site is located close to Ardmore, within walking and cycling distance and guests will be encouraged to use these modes of travel.
- Concerns in relation to overflow parking on the road are unfounded as parking is provided within the site and will be used by couples or younger families. This will reduce the demand for parking. Limit of 1 space per pod will be managed/enforced by the operators also.

- The proposal will not impact physical and visual character. Previous examples of permitted glamping pods show positive impacts and the precedent has been set with undesirable impacts not occurring.
- Proposal will not diminish the character of the area in terms of physical and landscape perspectives or uses and activity. The proposal has been carefully designed to integrate into the landscape, and the appeal seeks a grant of permission from An Coimisiún Pleanála,

## **6.2. Planning Authority Response**

6.2.1. None on file.

## **6.3. Observations**

6.3.1. There were a number of observations received in relation to the first party appeal. The main points can be summarised as follows:

- The site is located directly adjacent to an SAC and could potentially impact vulnerable species.
- Increased traffic, noise, light and parking outside the site will have a negative impact on this sensitive area.
- The proposal would detrimentally impact the Ardmore Cliff Walk, St. Declan's Way and important views. This would reduce the number of visitors to the area.
- The development of Ardmore's cliff top will lead to even more development at this location, which will negatively impact on the Ardmore tourism product. The sale of lands adjoining the subject site could lead to further development and degradation of the cliff top.
- Servicing of the Dysart area is an issue including storm water, sewers, broadband etc. and other development in the area has led to a decrease in water flow to St. Declan's Well.

- Services are required to the subject site, which have not been consented to along a private boreen/roadway. Other roads in the area are narrow with little capacity for further development traffic.
- Proposed glamping pods are welcome and necessary in Ardmore, but not at the identified location.

## **7.0 Assessment**

7.1. Having examined the application details and all other documentation on file, including the grounds of appeal, the reports of the local authority, and having inspected the site, and having regard to the relevant local/regional/national policies and guidance, I consider that the substantive issues in this appeal to be considered can be assessed under the following headings:

- Principle of Development
- Visual and Landscape Impact
- Site Access and Services – New Issue
- Residential Amenity

### **7.2. Principle of Development**

7.2.1. The proposal seeks planning consent for the development of what is described as glamping accommodation, comprising a total of 5 no. detached glamping pods, a caretaker storage unit, alterations and improvements to the access, 5no. parking spaces hard and soft landscaping including a biodiversity zone and all associated site works. Reason for Refusal No. 1 is related to Objectives ECON 24 and ECON 25 and it is noted the appeal site is located outside the settlement boundary of Ardmore. As per Objective ECON 24 of the current CDP, all tourist accommodation types will be supported at appropriate locations. The policy notes that proposals should generally be located within towns and villages (unless otherwise justified to the satisfaction of the Planning Authority).

7.2.2. The First-Party appeal sets out that objective ECON 25 does not apply to the subject site as the proposal is not for a camping or campervan site. I would consider the

proposed glamping pods to be a form of camping accommodation as the name is derived from the word 'camping', is intrinsically tied to the enjoyment of the outdoors, and therefore consider objective ECON 25 to apply to the proposal. This objective further requires location of such proposals at appropriate locations within or adjoining an existing settlement, with safe pedestrian connections. This appropriate location policy is particularly noted in relation to high potential tourism attractors that include the coastline and walking/tourism trails. Based on the provisions of ECON 24 and ECON25 I am not satisfied that the proposed development can be considered at this subject location, regardless of a carefully considered design response and the incorporation of appropriate landscaping treatments. Although glamping pods are semi-permanent structures, it is my view that there is insufficient policy support for the location as proposed.

7.2.3. I note that the policy of the current CDP generally requires tourism and recreation related developments to locate within or adjacent to existing towns and villages (Objective ECON 24 and ECON 25). Although the appeal has submitted that a diversity of uses is possible at rural locations, the observations to the appeal have raised significant concerns with respect to the principle of development at this location, within a rural area of high landscape value and at a removed location from the established settlement. Within their assessment of the planning application, the Planning Authority refer to the rural location of the proposal, outside the Ardmore Settlement Boundary and also refer to specific development objective (ADD013), which identifies a location for tourism accommodation to the northeast of the settlement. The proposed development was therefore considered unacceptable for not being located at an appropriate location within or adjacent to an existing settlement, that it hasn't demonstrated the provision of safe pedestrian links to the settlement, that it doesn't provide existing services to tourists, and that the site location does not have the capacity to facilitate the proposal, either from a visual, land-use compatibility or access perspective.

7.2.4. While Objective ECON 25 of the CDP does allow consideration of proposals at appropriate locations *'Camping sites to service a high potential tourism attractor such as the Waterford Greenway, coastline, rivers, Comeragh Mountains, walking and tourism trails, outdoor recreational amenities or Blueways, should be located at existing settlements or at established centres which provide existing services to*

*tourists, subject to the capacity of the site and the location to facilitate the proposal*'. Although Ardmore clearly has a strong outdoor recreational product in both the Cliff Walk/St. Declan's Way and the surrounding coastal attractions, and I observed the walking trails to be heavily in use when inspecting the appeal site and surrounding area, careful consideration of new development within this context is required. It is evident that Ardmore Head is currently a significant attraction for the area, and I am not satisfied that the principle of a development of this nature is aligned with local policy, is appropriate at this location and would not detract from the rural setting in which it would sit. In addition to this, the suitability of proposals of this nature should ensure that the character, environmental quality and amenity of the rural area is not adversely affected, and I will discuss these matters in further detail in the following sections.

- 7.2.5. Whilst I acknowledge concerns raised in observations to the appeal with respect to future proposals for the expansion of the proposed operations and the precedent a development of this nature would establish, I note that each proposal is considered on its own particular merits and any future plans for the development's expansion does not form part of this assessment and would be the subject of a separate application.
- 7.2.6. While the first party appeal includes a number of precedent examples of successful glamping developments elsewhere, I note these were under previous development plan policies and, in one case, in a separate jurisdiction. While I note the positive principles of the examples put forward, I do not consider it to be appropriate to use these examples to justify the location of the subject proposal in this instance.
- 7.2.7. In conclusion, based on the provisions of ECON 24 and ECON 25, the proposal is inconsistent with the provisions of the Waterford City and County Development Plan as it is not located at an identified appropriate location within or adjoining a settlement.

### **7.3. Visual and Landscape Impact**

- 7.3.1. The appeal site is located within the 'Most Sensitive' Area of landscape as set out in the Landscape and Seascape Character Assessment, at Appendix 8 in the CDP. Although I have noted under the Principle of Development that the subject proposal is not suitable under the agriculture land use zoning, the landscape and visual



impact have been raised in the appeal. The observers to the appeal have raised significant concerns with respect to the potential visual impact of the proposed development which they consider to be at odds with the tourism offering of Ardmore and will detract from the very amenity that the proposal is seeking to support. The 'Most Sensitive' landscape type is defined in the Landscape Character Assessment as having: *'Very distinctive features with a very low capacity to absorb new development without significant alterations of existing character over an extended area'*.

7.3.2. The applicant/first party appeal includes a 'flag assessment' to represent a visual impact appraisal of the proposal as time constraints did not allow for a full set of photomontages to be prepared. While I note the merits of highlighting the overall height of the proposal from various viewpoints, the erection of flags on site do not provide a full representation of how the proposal would look within this high value/'most sensitive' landscape. Views of the representative flags are provided from within the site, from lands to the south that are at a similar level to the subject site, and from the cliff walk/St. Declan's Way, that is at a lower level than the subject site and surrounding lands. I note in this instance, the proposal is relatively modest in scale, comprising a caretaker hut (height of c. 3.2m), 5 no. detached glamping pods (height of c. 3.2m) and associated car parking spaces. I am satisfied that views of the proposal from the cliff walk and the sea beyond, which is also at a level of approximately 50-55m lower, would be screened by the topography of the land contours at this location. Furthermore, I accept that any views from the sea towards Ardmore Head would be minimal in scale due to the distance from shore that would be necessary to bring the proposal into view. The high-quality materials, design including charred timber and sedum roof, and the existing built context to the north would all mitigate the impact of any views of the proposal. Additional screen planting and details of the biodiversity zone would also aid in mitigating visual impacts and assist with integrating the site into the landscape.

7.3.3. I note the provisions of Objective C&M 05 and L 02 and consider the subject proposal does not impinge on any substantial views to and from the sea or of the Ardmore Head Landscape feature. Furthermore, I do not consider that the proposal would detract from the visual amenity of the coast, owing to the sensitive design and materials put forward.

- 7.3.4. Having inspected the appeal site and surrounding area, I note that the site is considerably screened by the level differences between the site and the Cliff Walk. However, it is evident that the appeal site will be visible from the local road to the west and which is already the subject of development for detached dwellings. This area is not identified as being of any particular view sensitivity or a 'protected view' with the closest of these views being view 28 – the 'view from Ardmore Round Tower over Ardmore Bay', which is located to the northwest of the site with the view directed north-east. Although the glamping pods will largely be masked from view by the existing topography, the development will be visible from the area surrounding the watchtower to the south. Notwithstanding this, I am satisfied that the scale, design and form of the proposed glamping pods and the associated works on site will not unduly detract from the rural character of the site and surrounding area and will assimilate with the character of the site's immediate surrounds, where I note specifically that there is already built form in the context of detached dwellings to the north.
- 7.3.5. I note that an Ecological Impact Assessment has been prepared for the site which includes recommendations for habitat enhancements including planting native hedgerows and trees and improvement of heath grasslands. A Landscape Plan is referenced but this was not provided in the submitted documents. Some landscaping features are referenced on the submitted site layout plans. A sod and stone boundary wall with wooden post and wire fence is referenced to the northern boundary with existing fence lines to the south. Overall, I am satisfied that a development of this nature and scale can be successfully absorbed at this location and will not unduly detract from the rural character of the site, the lane and the surrounding area. Confirmation of landscaping and boundary treatments can be requested by way of condition if the Commission are minded to grant permission. In this regard, the proposal is considered to be acceptable having regard to the visual amenity of the site and surrounds. I am therefore satisfied that the visual impact of the proposal is not significant and could be integrated into the landscape at this location but do not consider this to overcome the recommended reason for refusal in relation to the principle of this development at a location outside the settlement and with regard to objectives ECON 24 and ECON 25 as outlined above.

#### **7.4. Site Access and Servicing – New Issue**

- 7.4.1. I note the Planning Authority have raised some cursory concerns in relation to the ownership of the laneway proposed to access the site stating that this is a private road and clarity on this issue would be required if the application was to proceed further. Clarification in relation to the ownership of the sewer that the proposed development will connect to, is also required as it would be routed underneath this private road.
- 7.4.2. The observers to the appeal further support this claim and submit that access to services for the subject proposal is dependent on consent to use this road, and which consent has not been provided and is unlikely to be provided given the opposition locally to the proposal.
- 7.4.3. The observers to the appeal have highlighted significant concerns with respect to the adequacy of the existing road which serves the site given its restricted width and condition. It is contended that the lane can only accommodate a single vehicle at a time, nor does it allow for the passing of vehicles and is therefore inadequate in width to accommodate tourism traffic generated by the proposed use.
- 7.4.4. Having inspected the appeal site and surrounds, I observed that the relatively short c.150m length of laneway currently serves 5 no. existing residential properties and the existing farmland to the south, with a poor-quality surface. Whilst I acknowledge that the lane is somewhat restricted in terms of its width, the Planning Authority also noted the sightlines provided by the applicant are to the centre of the road and should be to the nearside of the road. This detail was not sought or provided given the other reasons for refusal from the Planning Authority.
- 7.4.5. Observations on the application noted the private status of the access road to the subject site, with one submission providing a folio map showing the road marked in yellow that represents a 'right of way' in such circumstances. The submission notes that consent has not been provided to use the private road to service the site via water or wastewater. While I accept the right of way could allow access to the subject site, the matter of extension to sewer works will require road opening and construction works that would require consent. The First-Party appeal does not provide specific details in relation to the status or otherwise of the private road, instead focusing on the proximity of the site to Ardmore and that guests will be

encouraged to walk and cycle once they arrive at the site. Having regard to the absence of any detailed information in relation to the status of this private road and that the First-Party appeal does not address this matter, I consider this to be a fundamental area of concern in relation to access and servicing of the subject site.

7.4.6. Confirmation of consent to use the private road to access the proposed tourist accommodation site and details of how connections to the sewer and how this will be facilitated should be provided by the applicant before a decision can be made in relation to the subject proposal.

7.4.7. This is a new issue, and the Commission may wish to seek the views of the parties. However, having regard to the other substantive reasons for refusal set out under the Principle of Development, it may not be considered necessary to pursue the matter.

## **7.5. Residential Amenity**

7.5.1. Although the appeal site is located within a rural area, there are a number of established residences to the north of the appeal site. Concerns have been highlighted by the observers to the appeal with respect to the impact of the proposed development on the residential amenity of their properties, particularly with respect to noise impacts and potential anti-social behaviour associated with a development of this nature.

7.5.2. The First Party Appeal submits that the proposal is founded on the scenic and quiet character of the area, and this will not be compromised by the subject proposal.

7.5.3. Whilst I acknowledge the concerns of the observers to the appeal, I note that the appeal site is located in close proximity to established walking routes and is targeted to guests seeking a quiet rural retreat who would intend to utilise this resource, which I consider to be reasonable given its removed location from the nearest urban settlement. I am also conscious of the limited scale of the proposed development, the separation distances of 50m to the nearest dwelling to the north, the landscaping and boundary treatments proposed, and which can be further embellished by way of condition, and the relatively isolated location. Whilst a 24-hour, on-site presence may be necessary for developments of a certain scale, I am satisfied that on-site management of a facility such as the proposal can be adequately managed to minimise impacts on neighbouring properties. In addition, the concerns raised with

respect to the forest fires is not a relevant planning consideration in the context of the subject proposal. For the reasons outlined in the foregoing, I am therefore satisfied that the proposed development would not unduly diminish the residential amenity of properties within the vicinity of the appeal site, however for other reasons already set out, I consider the proposed location to be inappropriate, and permission should be refused on this basis.

## **8.0 AA Screening**

- 8.1.1. I have considered the proposed development of 5no. glamping pods and associated site works in light of the requirements S177U of the Planning and Development Act 2000 as amended (refer to Appendix 2). The closest Natura 2000 sites are Ardmore Head SAC (Site Code: 002123) located adjacent to the east of the site and Helvick Head to Ballyquin SPA (Site Code: 004192) located 3.5km northeast of the site.
- 8.1.2. The proposed development comprises the construction of 5no. glamping pods and all associated site works. The appeal submits that in accordance with the submitted Appropriate Assessment screening report, there will be no impact arising from the subject proposal in relation to Natura 2000 sites.

### **Screening Determination: Finding of no likely significant effects**

- 8.1.3. In accordance with Section 177U of the Planning and Development Act 2000 (as amended) and on the basis of the information considered in this AA screening, I conclude that the proposed development individually or in combination with other plans or projects would not be likely to give rise to significant effects on any European Site(s) in view of the conservation objectives of these sites and is therefore excluded from further consideration. Appropriate Assessment is not required. This determination is based on:
- The nature and scale of the works
  - Location-distance from nearest European site and lack of direct connections between the application site and the SAC/SPA
  - Taking into account screening determination by the PA.
- 8.1.4. Please refer to the attached appendices for detailed Stage 1 Appropriate Assessment.

## **9.0 Water framework Directive**

- 9.1. I conclude that on the basis of objective information, that the proposed development will not result in a risk of deterioration on any water body (rivers, lakes, groundwaters, transitional and coastal) either qualitatively or quantitatively or on a temporary or permanent basis or otherwise jeopardise any water body in reaching its WFD objectives based on the mitigation measures, drainage arrangements and management of surface water as set out in the proposed development. Please see WFD Assessment attached at Appendix 3 of this report.

## **10.0 Recommendation**

I recommend that permission is refused for the following reasons and considerations

## **11.0 Reasons and Considerations**

1. Having regard to the documentation submitted with the application and appeal, the Commission is not satisfied that there is suitable justification for the proposed development at a location outside the established settlement boundary of Ardmore. The proposed development is therefore considered to be contrary to policy objectives ECON 24 and ECON 25 of the Waterford City and County Development Plan 2022-2028 which seeks to encourage new glamping sites to locate within existing settlements. Further to this, there is no footpath linkage between the site and Ardmore and it is considered that pedestrian movements along a low-capacity private road would present a road hazard given the lack of pedestrian infrastructure. The proposed development would contribute to the encroachment of random rural development in the area, would militate against the preservation of the rural environment and would set an undesirable precedent for other similar inappropriate development in the vicinity. For this reason, the proposed development would be contrary to the proper planning and sustainable development of the area.
2. Having regard to the proposed infrastructure services for the subject site, and to the absence of detailed design within the application with regards to the provision of connections to the existing public sewer to the north, through

private land that does not form part of the application site, the commission cannot be satisfied that the proposed development can be adequately served with water and wastewater infrastructure and is therefore contrary to 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.

---

Matthew McRedmond  
Senior Planning Inspector

21<sup>st</sup> October 2025

### Form 1 - EIA Pre-Screening

<b>Case Reference</b>	ACP-323240-25
<b>Proposed Development Summary</b>	Construction of 5no. glamping pods, storage building, and all associated site works.
<b>Development Address</b>	Dysart, Ardmore, Co. Waterford
	<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>	State the Class here
<input checked="" 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 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><input checked="" 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 <del>Schedule 7A</del> information <del>submitted</del> proceed to Q4. (Form 3 Required)</b></p>	<p>Part 2, Class 12(c) and (d).</p> <p>Threshold: Holiday villages which would consist of more than 100 holiday homes outside built-up areas; hotel complexes outside built-up areas which would have an area of 20 hectares or more or an accommodation capacity exceeding 300 bedrooms.</p> <p>and/or</p> <p>Permanent camp sites and caravan sites where the number of pitches would be greater than 100.</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)?	
Yes <input type="checkbox"/>	
No <input checked="" type="checkbox"/>	<b>Pre-screening determination conclusion remains as above (Q1 to Q3)</b>

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

## Form 2 - EIA Preliminary Examination

<b>Case Reference</b>	ACP-323240-25
<b>Proposed Development Summary</b>	Construction of 5no. glamping pods, storage building, and all associated site works.
<b>Development Address</b>	Dysart, Ardmore, Co. Waterford
<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).	<ul style="list-style-type: none"> <li>- Proposed tourism use is compatible with other uses in area,</li> <li>- Modest size and intensity of development</li> <li>- No significant use of natural resources or production of waste</li> <li>- No significant risk of pollution or nuisance</li> <li>- No significant risk of accidents / disasters to human health</li> </ul>
<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).	<ul style="list-style-type: none"> <li>- Located within un zoned land on unserved land</li> <li>- Local ecology only on site</li> <li>- Built Heritage is adequately protected</li> <li>- No water features at the site</li> <li>- No designated sites at the site</li> </ul>
<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, duration, cumulative effects and opportunities for mitigation).	<p><b>Having regard to the following:</b></p> <ul style="list-style-type: none"> <li>- Nature and scale of the development,</li> <li>- Lack of significant environmental sensitivities on the site,</li> <li>- Absence of significant in combination effects,</li> </ul> <p><b>there is no potential for significant effects on the environmental factors listed in section 171A of the Act.</b></p>
<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.	EIA is not required.
--	----------------------

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

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

(only where Schedule 7A information or EIAR required)

## Appendix 2: AA Screening

<b>Screening for Appropriate Assessment Test for likely significant effects</b>	
<b>Step 1: Description of the project and local site characteristics</b>	
<b>Brief description of project</b>	The proposal is for 5no. glamping pods and all associated site works (refer to section 2 of Inspectors report for detailed description)
<b>Brief description of development site characteristics and potential impact mechanisms</b>	The site has an area of 0.36 hectares, is located on an elevated site approx. 750m southeast of Ardmore village centre and is adjacent to the Ardmore cliff Walk to the east. There is an existing residential estate known as The Heritage located to the northwest and a number of individual detached dwellings in the vicinity. The site contains a mix of bare ground, grass areas and boundary fencing. The closest European sites are Ardmore Head SAC (Site Code: 002123) located immediately to the east of the site and Helvick Head to Ballyquin SPA (Site Code: 004192) located 3.4km from the site. Surface water is proposed to be discharged to an attenuation tank and connection to public main sewer on New Line Road. Foul water will be directed to the public mains. There are no drainage channels or watercourse within the site. The closest watercourse is located approx. 1km to the northwest at Duffcarrick River and the Celtic sea is located approximately 100m to the east.
<b>Screening report</b>	Y
<b>Natura Impact Statement</b>	N
<b>Relevant submissions</b>	Various submissions refer to the potential impacts of the proposal on European sites due to construction and disturbance during operation.
The AA Screening Report considers European sites within a 15km radius and identifies 6 sites for consideration for AA Screening, in addition to the sites listed below the sites considered are Blackwater River (Cork/ Waterford) SAC (Site Code: 002170) located 7km northwest from the appeal site, Blackwater Estuary SPA (Site Code: 004028) located 7km west from the appeal site, Ballymacoda (Clonpriest and Pilmore) SAC 12km northeast of the appeal site, and Ballymacoda Bay SPA 11km north east of the appeal site. I consider that there is no ecological justification for consideration of the sites beyond those listed below, and I have only included those sites with any possible ecological connection or pathway in this screening determination.	
<b>Step 2. Identification of relevant European sites using the Source-pathway-receptor model</b>	

European Site (code)	Qualifying interests <sup>1</sup> Link to conservation objectives (NPWS, date)	Distance from proposed development (km)	Ecological connections <sup>2</sup>	Consider further in screening <sup>3</sup> Y/N
Ardmore Head SAC (Site Code: 002123)	Vegetated sea cliffs of the Atlantic and Baltic coasts; European dry heaths.	Adjoining the site to the east	No spatial overlap, therefore no direct connection with this SAC. No hydrological or ecological connection via air or land. The site does not support the habitats relevant to this SAC.	N

Link to Conservation Objectives: <https://www.npws.ie/protected-sites/sac/002123>

Helvick Head to Ballyquin SPA (Site Code: 004192)	Cormorant (Phalacrocorax carbo) Peregrine (Falco peregrinus) Herring Gull (Larus argentatus) Kittiwake (Rissa tridactyla) Chough (Pyrrhocorax pyrrhocorax)	3.6km	No spatial overlap, therefore no direct connection with this SAC. No hydrological or ecological connection via air or land. The appeal site is not of interest for mobile species relevant to this SAC.	N
---	--	-------	---	---

Link to Conservation Objectives: <https://www.npws.ie/protected-sites/spa/004192>

<sup>1</sup> Summary description / **cross reference to NPWS website** is acceptable at this stage in the report

<sup>2</sup> Based on source-pathway-receptor: Direct/ indirect/ tentative/ none, via surface water/ ground water/ air/ use of habitats by mobile species

<sup>3</sup>if no connections: N

### Step 3. Describe the likely effects of the project (if any, alone or in combination) on European Sites

No potential for likely significant effects on European sites during the construction or operational phase has been identified due to the small scale of the proposed development.

### Step 4 Conclude if the proposed development could result in likely significant effects on a European site

I conclude that the proposed development (alone) would not result in likely significant effects on Ardmore Head SAC (Site Code: 002123) and Helvick Head to Ballyquin SPA (Site Code: 004192). The proposed development would have no likely significant effect in combination with other plans and projects on any European site(s). Due to distance and lack of meaningful ecological connections there will be no changes in ecological functions due to any construction related emissions or disturbance. There will be no direct or ex-situ effects from disturbance on mobile species during construction or operation of the proposed development. No mitigation measures beyond normal standard construction mitigation and drainage works are required to come to these conclusions. No further assessment is required for the project.

## **Screening Determination**

### **Finding of no likely significant effects**

Having carried out Screening for Appropriate Assessment of the project in accordance with Section 177U of the Planning and Development Act 2000 (as amended), I conclude that that the project individually or in combination with other plans or projects would not be likely to give rise to significant effects on European Sites within the surrounding area namely, Ardmore Head SAC or any other European site, in view of the sites Conservation Objectives, and Appropriate Assessment (and submission of a NIS) is not therefore required.

This determination is based on:

- The relatively minor scale of the development and lack of impact mechanisms that could significantly affect a European Site
- Distance from and weak indirect connections to the European sites
- No ex-situ impacts

### Appendix 3: Water Framework Directive Assessment

WFD IMPACT ASSESSMENT STAGE 1: SCREENING			
Step 1: Nature of the Project, the Site and Locality			
An Bord Pleanála ref. no.	ABP-323240-25	Townland, address	Dysart, Ardmore, Co. Waterford
Description of project		5-storey, 220-bed tourist accommodation facility with ground floor café, and all associated site works.	
Brief site description, relevant to WFD Screening,		<p>Site is located at the southeast of Ardmore Village in the townland of Dysart. The site is slopes eastward towards the cliff walk and sea with a sharp drop off at the eastern boundary. The site is not connected to any identifiable watercourses. Excess storm water will connect to the existing network. A water quality monitoring station is located approx. 750m northwest of the site at Ardmore Pier.</p> <p>The closest watercourse is located approx. 1km to the northwest at Duffcarrick River and the Celtic sea is located approximately 100m to the east.</p>	
Proposed surface water details		Connection to existing storm sewer beneath public road at New Line Road.	
Proposed water supply source & available capacity		Connect to existing supply. Uisce Eireann confirmed capacity available without upgrades.	
Proposed wastewater treatment system & available capacity, other issues		Uisce Eireann Wastewater connection available without upgrades.	

Step 2: Identification of relevant water bodies and Step 3: S-P-R connection						
Identified water body	Distance to (m)	Water body name(s) (code)	WFD Status	Risk of not achieving WFD Objective e.g.at risk, review, not at risk	Identified pressures on that water body	Pathway linkage to water feature (e.g. surface run-off, drainage, groundwater)
River Waterbody	1km northwest	DUFFCARRICK_010 IE_SE_17D090400	Moderate	Under Review	None	No.
Groundwater Waterbody	Underlying site	Helvick Head IE_SE_G_073	Good	Not at Risk	None	No. Well drained soil and rock conditions below surface.
Coastal Waterbody	100m east	Eastern Celtic Sea SE_050_0000	High	Not at risk	None	Not hydrologically connected
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.						
CONSTRUCTION PHASE						



No.	Component	Waterbody receptor (EPA Code)	Pathway (existing and new)	Potential for impact/ what is the possible impact	Screening 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.	River	DUFFCARRIC K_010	None.	None	None	No, due to separation distance and location.	Screened out
2.	Ground	Helvick Head IE_SE_G_073	Yes pathway exists via moderate drainage characteristics, drainage through soil.	Spillages	Standard construction management measures	No.	Screened out.
OPERATIONAL PHASE							
1.	River	DUFFCARRIC K_010	None.	None	None	No, due to separation distance and location. No connection.	Screened out
2.	Ground	Helvick Head IE_SE_G_073	Yes pathway exists via moderate drainage characteristics, drainage through soil.	Spillages	Connection to existing storm sewer network/SuD s	No	Screened out

3.	Transitional	Eastern Celtic Sea SE_050_0000	None	None	As above	No	Screened out
DECOMMISSIONING PHASE							
5.	N/A						