



An
Coimisiún
Pleanála

Inspector's Report PL-500209-LH-25

Development	Amendments to current planning approval ref no. 18753 to include change of use of house 1-3 from residential to short term letting and all associated site works. Protected Structures LHS-015-010 & LHS-015-011.
Location	Widows Houses, Castlebellingham, Co. Louth.
Planning Authority	Louth County Council
Planning Authority Reg. Ref.	2560385
Applicant(s)	Mark Meehan & Martin McCourt
Type of Application	Permission
Planning Authority Decision	Grant Permission + Conditions
Type of Appeal	Third Party Normal Planning Appeal
Appellant(s)	Belinda Sansom
Observer(s)	Department of Housing, Local Government and Heritage

Date of Site Inspection

9th January 2026

Inspector

Aisling MacNamara

1.0 Site Location and Description

- 1.1. The proposed development relates to an existing historic structure (protected structure) which contains a group of 4 no. dormer type houses known as 'Widows' Houses', located within the town centre of the settlement of Castelbellingham in County Louth. The structure was constructed in 1826 to house the widows of employees of Bellingham Estate.
- 1.2. The site is located a number of meters from Main Street R132 and is accessed via a section of paved access road (which was the original road to Castle Bellingham Estate) which serves the 'widows' houses', three similarly styled detached former 'worker houses', St. Mary's Church and graveyard and Bellingham Estate hotel (gated access). The rear boundary of the site abuts St. Mary's Church and graveyard. The current main access avenue to Bellingham Castle is to the south of this.
- 1.3. The protected structure is a storey and a half stone structure with double pitched roof, dormer windows and number of projecting bays. There is a single storey brick porch extension to the western gable. There is garden to the front and both sides and there is a yard to rear. The front boundary is treated in 2m stone wall and railing /hedge in parts. The property is accessed by existing double gateway to the eastern side garden and by three pedestrian access points.
- 1.4. The property is currently vacant and in unkempt condition.

2.0 Proposed Development

- 2.1. Permission is sought for amendments to Planning Ref no.18/753 to include the following:
 - change of use of house numbers 1-3 from residential to a short term letting unit,
 - change of use of the approved extension and house no.4 from residential to commercial,
 - reconfiguring of carparking layout,
 - replacement of existing staircases at house no.s 2 and 3,

- amendments to floor plan and the design of the approved extension,
- construction of a new WC block,
- proposed landscaping works, signage, refuse store and all associated works.

The works relates to protected structure listing no. LHS-015-010 & LHS-015-011.

The area of the site is 0.050ha.

The floor space of the existing building is 118sqm (to be retained).

The floor space of the proposed works is 74sqm.

3.0 Planning Authority Decision

3.1. Decision

By order dated 8th October 2025, permission was granted for the development subject to 7 conditions.

Condition 2(a) states that proposed works shall be carried out as per the impact assessment and mitigation measures set out in the Heritage Impact Assessment Report dated June 2025 and the Architectural Heritage Protection Guidelines for Planning Authorities.

Condition 2(b) states that 2 car parking spaces shall be provided in the eastern garden as previously permitted under ref no. 18/753. The existing trees shall be retained with the use of a permeable surface on the driveway / parking area. The front garden areas shall be retained as green space with appropriate railings and pedestrian access.

Condition 2(c) states that the hours of operation of the commercial space in the approved extension and house no. 4 shall be 09.00 am to 21.00 pm Monday to Sunday unless otherwise agreed in writing with the planning authority.

Condition 2(d) states that no signage other than that hereby approved shall be erected on site without a grant of planning permission.

Condition 3 requires the developer to engage an accredited Conservation Architect to supervise and certify that the works are executed in accordance with Department requirements and best conservation practice.

Condition 4 requires that the driveway and parking areas have permeable gravel / paved surface and that measures are taken to prevent damage to public road during works.

Condition 6 relates to the carrying out of proposed landscaping and states that all existing boundary and garden walls, piers and other features shall be protected during construction and retained thereafter.

Condition 7 requires works be monitored by an archaeologist and outlines measures should archaeology be found during works.

3.2. Planning Authority Report

3.2.1. Planning Reports

- The first planners report of 05/08/2025 sets out an assessment and recommendation to request Further Information. The planning authority was satisfied that the principle of development is acceptable, short term letting is acceptable and in compliance with Government guidelines, proposed works generally have acceptable impact on the integrity of the protected structure with the exception of carparking and signage proposals.
- Further Information was requested by the planning authority on 08/08/2025 in relation to 4 items as follows:
 - (1) Concern over proposed car parking in front garden and impact on the protected structure, requests applicant to submit revised plans showing parking in eastern garden as per permitted 18/753 with front garden retained as green space with railings and pedestrian access. Signage, due to scale and height is likely to have negative impact on visual amenities and setting and applicant requested to submit revised plans.
 - (2) Provide clarification regarding the precise nature of the proposed commercial use of dwelling no. 4 and rear extension having regard to the protection of residential amenity in the vicinity.
 - (3) Submit proposals showing compliance with policy IU19 of CDP in relation to sustainable drainage systems.

- (4) Submit revised public notices in the event that the FI submission is 'significant'.
- The response to the FI request was received on 23/09/2025 as follows:
 - (1) Two options submitted – (i) revised site layout drawing submitted showing 2 no. car parking spaces within the existing east facing garden, one space to front of western porch, existing site access gateway increased in width to 3.1m to accommodate turning of cars, and (ii) reverting to the original proposed. Concerns raised that the FI revisions requested by the planning authority will detrimentally impact on the character and setting of the protected structure (removal of eastern outdoor open space addressing Main Street, removal of trees, requirement for looped path in order to address level changes between parking area and ground floor of extension). Suggest that the original proposal with parking on the western part of the front elevation has a lesser impact on the protected structure. Drawing submitted showing signage. It is relocated further west closer to the existing building, sign board reduced in area, timber natural material.
 - (2) A letter from building owner is submitted detailing the proposed uses. The letter states that the building is to accommodate a broad range of local and community uses including gallery, museum, meetings, classes, Sunday school, church events, community market including coffee dock in conjunction with uses. The development is for adaptive re use of the building which has been vandalised and subject to anti social behaviour. The uses will not be detrimental to residential amenity.
 - (3) It is not possible to drain surface water on site – as per the existing permission. A copy of engineers letter submitted under PRR18/753 is submitted. This letter indicates that there is insufficient space on site to provide soakaway in accordance with standards (no soakaway within 5m of building or roadway). Roof water is to be piped to the existing surface water network in the road and new driveway is to have permeable material.
 - (4) New public notices not required.

- The second planners report of 07/10/2025 concludes that the response is acceptable and recommends permission be granted subject to conditions. The planner remains of the opinion that parking in the eastern garden is more appropriate than original proposal for parking to front of building and that trees in eastern garden can be retained with use of gravel or cobble-lock parking.

3.2.2. Other Technical Reports

Placemaking & Physical Development/ Major Capital Projects & Infrastructure Section:

- The report of the Executive Engineer dated 15/07/2025 includes a recommendation to seek Further Information in relation to surface water collection and disposal.
- The report of the Executive Engineer dated 13/10/2025 indicates no objection subject to conditions relating to visibility sightlines at site entrance to public road, surface water discharge, management of services, road opening licence, protection of road at construction stage.

3.3. Prescribed Bodies

Department of Housing, Local Government and Heritage dated 30/07/2025: The development is located within the Zone of Notification associated with Recorded Monuments LH015-008001 Church and LH015-008002 Graveyard. Given the extent and location of the proposed development it could impact on subsurface archaeological remains. Recommended condition set out for monitoring of ground works and necessary mitigating action for any material found.

3.4. Third Party Observations

Two third party submissions were received from residents of Castlebellingham. The issues raised are as follows:

- The roadway to the front of Widows Cottages is privately owned. Access rights to this private road are for limited residential use. The use of this right of way to a commercial unit would be outside of the scope of the right of way.

The owner of the roadway does not consent for it to be used for any commercial purpose.

- The type of commercial use proposed has not been specified, concern regarding impact on character of area.
- Any proposed commercial use would lead to intensification of traffic. Parking is not provided for the commercial unit – parking and disruption concerns.

4.0 Planning History

- PA25/168 – grant - extension of duration of permission 24/155 which consists of permission for development under 18/753. Expiry date 31st December 2027.
- PA24/155 – grant - extension of duration of 18753 - Planning permission for extensions and modifications to existing 4 dwelling houses to provide 2 dwelling houses. Protected structure LHS-015-010 and LHS-015-011/ NIAH 13826012. Works to include all ancillary and associated site works. This site is located within the Castlebellingham Architectural Conservation Area. Expiry date 31st December 2025.
- PA18/753 – grant – permission for extensions and modifications to existing 4 dwelling houses to provide 2 dwelling houses. Protected structure LHS-015-010 and LHS-015-011/ NIAH 13826012. Works to include all ancillary and associated site works. This site is located within the Castlebellingham Architectural Conservation area.
- The appeal submission states that a Section 57 Declaration was issued by the planning authority on 28th April 2024 for conservation works.

5.0 Policy Context

5.1. Development Plan

The Louth County Development Plan (CDP) 2021-2027 applies to the proposed development. The following provisions are of relevance:

- The site is located within the settlement boundary of Castlebellingham/ Kilsaran, which is identified as a Level 3 Self-Sustaining Town in the county's settlement hierarchy. These towns are described as self sustaining towns with high levels of population growth and weak employment base which are reliant on other areas of employment and / or services and which require targeted 'catch up' investment to become more self-sustaining. Table 2.15 Core Strategy Table indicates that Castlebellingham/ Kilsaran is allocated housing growth of 65 units between 2021-2027.
- The site is located on land zoned 'B1 – Town or Village Centre' where the objective is *"To support the development, improvement and expansion of town or village centre activities"*. The following guidance is set out: *The purpose of this zoning is to protect and enhance the character and vibrancy of existing town and village centres and to provide for and strengthen retailing, residential, commercial, cultural, entertainment and other appropriate uses. It will promote the consolidation of development on town and village centre lands, allowing for a broad range of compatible and complementary uses, which will be encouraged to locate in this area in order to create an attractive environment to reside, shop, work, visit and in which to invest. The appropriate reuse, adaptation and regeneration of buildings, backlands, vacant, derelict and underutilised lands for uses suitable to the location will be encouraged. Such uses may include residential development. The full use of upper floors in retail and commercial premises in the town centre for residential use is considered permissible. Primacy of the Retail Core area will be retained and prioritised for any new retail development to enhance its vitality and viability. Retail proposals shall have regard to relevant policies and objectives in the Retail Strategy (Appendix 4, Volume 3) and Chapter 5 of this Plan and the Retail Planning Guidelines 2012. Town centre development proposals will be required to be of a high architectural quality, which contributes to a distinct sense of place and public realm, promotes sustainable modes of travel and be appropriate to its location. New commercial and retail uses will be accommodated in village centres. The size and scale of any such development shall be reflective of the role and function of the village in the settlement hierarchy.*

- The site is located in the Castlebellingham Architectural Conservation Area.
- The site contains Record of Protected Structures (RPS)

LHS015-010 The Widows Houses Terraced Cottage 1 – House

Description: Pair of semi-detached multiple-bay single-storey with half dormer attic former estate worker's houses, built 1826/7, now in use as private houses. Porch extension to west gable built 1864, dormers to north elevation, half dormers to south.

Appraisal: Two of a group of similar houses, possibly designed by William Vitruvius Morrison and known as the Widow's Houses, this group was built to accommodate the widows of Castlebellingham estate employees. The finely executed detailing in this exquisite pair remains largely intact.

LHS015-011 The Widows Houses Terraced Cottage 2 – Cottage

Description: One of a pair of semi-detached multiple-bay single-storey with half-dormer attic former estate worker's houses, built 1826/7, now in use as private houses. religious Della Robbia-revival plaque - square-headed door opening surmounted by flush limestone pediment with triangular overlight and carved inscription "John III.16, John XIV. 6, Acts IV.12", painted timber vertically-sheeted door, limestone threshold. Approached by cobbled path, adjacent to church to south.

Appraisal: Two of a group of similar houses, possibly designed by William Vitruvius Morrison and known as the Widow's Houses, this group was built to accommodate the widows of Castlebellingham estate employees. The finely executed detailing in this exquisite pair remains largely intact.

- There are a number of other protected structures in the vicinity of the site – 006 (Widows Houses, House 3), 007 (Widows Houses, House 4), 008 (Widows Houses, House 5), 017 (Kilsaran Parash Church), 009 (Bellingham Castle Gate House), 033 (Aloine Crucifix), 032 (House on Main Street)
- The site is in proximity to recorded monuments located at the adjoining St. Mary's Church (LH015-008001 Church and LH015-008002 Graveyard)

Chapter 6 Tourism

6.5.2 Self-Catering Accommodation

Self-catering accommodation is defined as ‘purpose built self-contained residential units, which provide accommodation on a short term basis for visitors to the area’.

TOU 27 To facilitate the provision of self-catering accommodation in locations within existing towns and villages, of a scale that the settlement can sustain.

6.5.5 Short Term Lettings

Under the Residential Tenancies (Amendment) Act 2019 and the Planning and Development Act 2000 (Exempted Development) No.2 Regulations 2019 reforms have been introduced to the short term letting sector. These reforms are aimed at addressing the impact on the private rental market by the use of residential homes for shortterm tourism type letting in areas of high housing demand. These provisions only apply to areas designated as ‘Rent Pressure Zones’ under the Residential Tenancies Act (as amended). At the time of writing all of County Louth, with exception of the Clogher electoral area was designated a Rent Pressure Zone. The Short Term Letting Regulations will only apply as long as there are designated Rent Pressure Zones, which, at the time of writing is until December 2021. There is provision to extend these designations further if rental supply issues still remain in 2021

Under the new arrangements applicable in rent pressure zones:

- Short term letting is defined as the letting of a house or apartment or part of a house or apartment, for any period not exceeding 14 days;*
- Homesharing continues to be permissible on an unrestricted basis;*
- Homesharers are allowed to sub-let their entire principle private residence for a cumulative period of 90 days where they are temporarily absent from their home;*
and
- Where the 90 day threshold is exceeded, change of use permission will be required. Homesharers in rent pressure zones who wish to avail of these exemptions are required to register with the Council.*

Any property that is not a principle private residence that is to be used for short-term letting will require a change of use application. These applications will be assessed on a case by case basis and will take account of issues such as; the demand for private housing in the area, the suitability of the property for short term letting, the car parking, access and service arrangements, and the impact of the development on surrounding residential amenities and the local environment.

Chapter 7 Movement

MOV 15 To encourage a modal shift from use of the private car towards more sustainable modes of transport including walking, cycling, and public transport.

Chapter 9 Built Heritage and Culture

BHC 20 To ensure that any development, modification, alteration, or extension affecting a protected structure and / or its setting is sensitively sited and designed, is compatible with the special character and is appropriate in terms of the proposed scale, mass, density, layout, and materials of the protected structure.

BHC 21 The form and structural integrity of the protected structure and its setting shall be retained and the relationship between the protected structure, its curtilage and any complex of adjoining buildings, designed landscape features, designed views or vistas from or to the structure shall be protected.

BHC 22 To prohibit inappropriate development within the curtilage and/or attendant grounds of a protected structure. Any proposed development within the curtilage and/or attendant grounds must demonstrate that it is part of an overall strategy for the future conservation of the entire complex including the structures, demesne and/or attendant grounds.

BHC 24 To require the retention of original features such as windows, doors, renders, roof coverings, and other significant features which contribute to the character of protected structures and encourage the reinstatement of appropriately detailed features which have been lost, to restore the character of protected structures as part of development proposals.

BHC 25 To promote best conservation practice and the use of skilled specialist practitioners in the conservation of and for any works to protected structures.

BHC 26 To encourage the retention, sympathetic reuse and rehabilitation of protected structures and their settings where appropriate and where the proposal is compatible with their character and significance. In certain cases, development management guidelines may be relaxed in order to secure the conservation of the protected structure and architectural features of special interest.

BHC 31 To require that all development proposals within or affecting an Architectural Conservation Area preserve or enhance the character and appearance of that area, protect architectural features of special interest and ensure that the design respects the character of the historic architecture in terms of height, scale, layout, and materials. All development proposals shall have regard to the Architectural Conservation Area objectives in Appendix 11, Volume 3 and objectives contained in applicable Character Appraisals where available.

BHC 1 To protect and enhance archaeological sites and monuments, underwater archaeology, and archaeological objects listed in the Record of Monuments and Places (RMP), and/or the Register of Historic Monuments and seek their preservation (i.e. presumption in favour of preservation in situ or in exceptional cases, at a minimum, preservation by record) through the planning process and having regard to the advice and recommendations of the National Monuments Service of the Department of Housing, Local Government and Heritage and the principles as set out in the 'Framework and Principles for the Protection of the Archaeological Heritage' (Department of Arts, Heritage, Gaeltacht and the Islands 1999).

Chapter 13 Development Management Guidelines

13.16.12 Car Parking Standards.

Area 3 applies to self sustainable towns, small towns and villages

A reduction in the car parking requirement may be acceptable where the Planning Authority is satisfied that:

- There is sufficient parking available in the vicinity of the development to cater for any shortfall;*
- The nature of the development is such that existing parking spaces in the vicinity could facilitate the dual use of parking spaces, particularly if the development*

operated at off-peak times. Supporting documentation will be required demonstrating how the dual use will work;

- The public transport links available would reduce the demand for car parking;*
- The central location of the development is such that the customers/residents/users of the development would be likely to walk or cycle; and*
- There was no off street car parking provided with the existing/previous use of the property and the redevelopment of the property would not result in a significant increase in the car parking requirement.*

A Transport Mobility Management Plan supporting any reduction in car parking shall be included with any application where the quantum of parking is significantly below that set out in the Car Parking Standards (Table 13.11). Parking demand calculations shall be provided detailing the demand throughout the day from a database of similar types of development in similar circumstances.

Appendix 11 Louth Architectural Conservation Areas

Castlebellingham ACA

13.3 Character

The deep river valley generates a strong focal point in the landscape drawing the countryside into the town. The urban form of Castlebellingham ACA is much as it was in the eighteenth and nineteenth century with the main road providing a series of pleasant views and interesting spaces – at the Gateway, the green, and terminating at the northern junction. The Castle, Church and estate cottages form a picturesque grouping near the river. The main street is made up of a combination of residential and commercial buildings linked in terraces, with an occasional detached house, all generally two storeys in height, with only one, three storey house on the Annagassan Road. The roofs are pitched and gabled. Of particular notes are the Widows' Cottages with their highly decorative chimneystacks, barge boards, and windows.

13.5 Objectives

- 1. To preserve the special character of the town and its setting through positive management of changes to the built environment, in particular, by requiring that the height, scale, design and materials of any proposed development within the town*

and in the surrounding area should complement its character and not diminish its distinctiveness of place.

2. To protect the landscape setting of the village and the views inwards.

3. To preserve the historic street pattern and character of the village, by the retention of buildings and materials as described above, and the retention of existing boundary features, walls.

4. To require the preservation and reinstatement of traditional details and materials on existing buildings and in the streetscape where improvements or maintenance works are being carried out.

5. To use appropriate materials, street furniture and lighting in any public development of the area.

Castlebellingham / Kilsaran Statement (Volume 2)

2.11.1 Settlement and Housing

Policy Objective CAS 1 To consolidate and strengthen the commercial and residential town centre of Castlebellingham/Kilsaran and encourage development, which will contribute to its character, preserve and enhance the quality of its attractive built and natural environment, while catering for the needs of all sections of the local community.

CAS 2 To support the role of Castlebellingham/Kilsaran as a local service and employment destination by facilitating development which will contribute to its economy and complements and enhances the town's attractive natural and built heritage.

CAS 4 To support and encourage residential development on under-utilised and/or vacant lands including 'infill' and 'brownfield' sites, subject to a high standard of design and layout being achieved.

2.11.4 Movement

CAS 14 To promote and facilitate the development and enhancement of footpaths, pedestrian crossings and traffic calming measures which increase pedestrian priority and improve road safety.

2.11.5 Natural and Built Heritage

CAS 19 To protect and enhance the unique characteristics and setting of Castlebellingham/ Kilsaran including its archaeological features, ACA and built and natural heritage elements.

5.2. Other policies

- Architectural Heritage Protection Guidelines for Planning Authorities, 2011
- Circular on Short-Term Letting and the Planning System SPI01/2026, Department of Housing, Local Government and Heritage, 23rd January 2026

In accordance with current planning legislation, i.e. the Planning and Development Act 2000 and associated Planning and Development Regulations 2001, short-term letting is defined as letting all or part of a property, where the property owner or 'host', may or may not be present, for periods of up to 2 weeks at a time. It is also defined as a material change of use that may, in certain circumstances, require planning permission.

In assessing any such planning applications, planning authorities must make a planning decision on the merits of the particular application, having regard to any relevant policies set out in the local authority development plan for the area in question. In conjunction with, or absent development plan policies, the assessment of a planning application for short-term letting may also consider relevant planning matters to determine suitability, which may include:-

- *access, traffic, parking, drainage, waste management, design, privacy, noise, disturbance, open space and amenities;*
- *the nature of the site/location and any relevant statutory designations;*
- *evidence of the level of housing demand in the area and in particular, the nature of the rental market.*

It is intended that in areas outside cities and larger towns, local authorities will be encouraged to develop local policies to balance the needs of housing supply and tourism through their county development plan. In such locations, there will be a greater degree of flexibility to grant planning permission for short-term letting proposals that are considered suitable in planning terms.

5.3. Natural Heritage Designations

There are no sites designated for natural heritage within or in proximity to the site. The closest natural heritage site is Dundalk Bay SAC and pNHA located c 1.6km from the site.

5.4. EIA Screening

The proposed development is not a class for the purposes of EIA as per the classes of development set out in Schedule 5 of the Planning and Development Regulations 2001, as amended (or Part V of the 1994 Roads Regulations). No mandatory requirement for EIA therefore arises and there is also no requirement for a screening determination. Refer to Form 1 in Appendix 1 of report.

6.0 The Appeal

6.1. Grounds of Appeal

A third party submission has been received from the owners of the adjoining property 'Tudor Cottage'. The grounds of appeal are summarised as follows:

- The roadway that the Widows Houses are on is a privately owned road which runs from the entrance to the church graveyard past Tudor Cottage, the Widows Houses and the Church – access rights to this private road are for limited residential use only and for private access only to properties. These access rights belong to the Tudor Cottage property. The use of this right of way for a commercial unit would be outside of the scope of the right of way. As owner of this roadway, permission is not given for the roadway to be used for any commercial purpose and will not be allowing additional access for either vehicular or pedestrian traffic that this commercial business may bring.
- A commercial use for this property will lead to intensification of traffic in the immediate area.
- The current application does not include any provision for parking to support a commercial use for house 4 – this issue has not been addressed in the grant of permission. Increase in traffic will lead to unauthorised parking of the

private road which is already an issue due to the lack of parking in the village. Residents regularly find access blocked by unauthorised parking on this roadway and around the Crucifix Area.

- Illegal parking on road can restrict visibility at junction with public road, leading to road safety concerns. Matter has been raised with Council however as this is private roadway they have not acted.
- Traffic congestion and parking on footpath, roadway etc with current local businesses is causing constant disruption to traffic and residents in the area. This will exacerbate in the absence of a parking and traffic management strategy.
- Intend to erect gates across the roadway and will not be allowing access for any commercial activity. For area not enclosed by gates, intend to employ a private operator to enforce clamping. Closing of access will force parking issue back into the village, onto footpaths on a dangerous bend on the N1 and the private avenue for Bellingham Castle. Pedestrian access will be for residents only once gates are erected so this commercial development will need an alternative plan for the commercial access to the Widows Houses.
- The appeal letter is signed by other residents of the private roadway indicating agreement with the details in the letter.
- A copy of correspondence from Louth County Council Road Safety Officer is submitted indicating that the Council have no jurisdiction over cars parked at this location as it is a private road.
- Photographs submitted in support of the appeal.
- A copy of the original objection is submitted with the appeal.

6.2. Applicant Response

The applicant has responded to the third party appeal. This response is summarised as follows:

- The appeal is invalid. The correspondence from ACP dated 7th November 2025 did not contain a copy of the planning authority's acknowledgement of

the applicants initial objection on PA2560385. As is required under section 127 of the Planning and Development Act 2000 as amended, an appeal must be accompanied by the planning authority's acknowledgement.

- 18/753 is now currently under construction (extensions and modifications 4 houses redeveloped to 2 houses).
- A description of the project background is set out including details of site location and description, planning history and a description of the current application.
- Conservation works were undertaken from 2023, in part funded by Historic Structures Fund including restoration of brick chimneys, repair of roof, reinstatement of fascia details. The easternmost unit is vacant since 2014 and westernmost unit is vacant since 2016.
- Details are set out of the Architectural Heritage Impact Assessments carried out under 18/753 and 25/603835 (the subject application). The HIA submitted with the application compares works under the two applications and shows that the current proposal involves reduced interventions with retention of more of the internal fabric and restores it to its former state to a greater extent than that of 18/753. Interventions will allow for adaptation of the structure – two staircases to be removed which are too steep for safe access, decayed condition.
- Details of the internal reports of the planning authority are described including the planning officers report, the further information stage and external reports. This is followed by details of the applicant's response to the grounds of appeal:
 - Legal issues - There are a number of elements of the appeal that are civil matters and fall outside of the remit of planning. These include the claims of the appellant regarding legal ownership of the road and the consequent closure of the roadway for public access and claims regarding an alleged right of way. The appellant does not provide any evidence to support these assertions. The applicant has full entitlement to carry out the development as proposed. The planning authority was satisfied with the applicant's legal right.

Note Section 34(13) of the Planning and Development Act 2000 (as amended).

- Car parking – Three parking spaces provided – not designated for any element. Not accurate to say there is no parking for commercial use. The applicants would not object to condition requiring car parking spaces reserved for short term letting. The commercial space is 88.6sqm, applying Table 13.16.12 the proposed community uses would require a maximum of 4 parking spaces. CDP policies BHC26 and BHC34 allow for reduced parking for historic structures. There are further reductions that can be applied. Other parking available in village, on street parking and car parking to north within easy distance. There is bus stop 5 mins walk away with hourly bus services to Dundalk, Drogheda and surrounding area. Uses are likely to attract locals walking and cycling. The previous use of Widows Houses did not have car parking spaces. This is a central village location. The level of parking is adequate. Shortfall is minimal and can be absorbed in area. St. Mary's church is still in active use – therefore long established pattern of community uses in this area. Have invested considerably in restoration of building. Applying stringent parking standards could cause houses to become difficult to develop.
- Development complies with Louth CDP 2021-2027. Complies with provisions and objectives in the development plan in relation to:
 - Land use zoning – restoration and reuse of buildings, uses acceptable, positively contributes to heritage and character, accessible to sustainable transport.
 - Tourism – tourist destinations in the surrounding area, need to provide tourist and visitor accommodation to facilitate tourism growth.
 - Self catering accommodation and short term letting - The structure is suitable for short term letting. The site is in a rent pressure zone. Note constrained size and limited functionality of existing units for long term rental to families. Structure is historically linked to Bellingham Castle and Estate, now a hotel. Letter of support provided from Bellingham Castle indicating that there is a need for tourist accommodation in the village and the proposal

would positively contribute to the hotel operations. The use of three small historic structures for short term letting would not be detrimental to private housing. There have been a number of permissions granted for private housing in Castlbellingham. The demand for private housing in Castlbellingham is being provided for through these residential developments (list provided of permitted private housing development in area showing permission for 198 units). Development is of a scale that the settlement can sustain, provided with car parking and access. No negative impact on nearby residential amenity. No negative impact on environment (EIAR not required, no adverse impact on European site).

- Built heritage and culture – designs are sensitive and compatible with the protected structure, 2 new structural elements proposed – extension and WC block. The use of the extension is to change to commercial use. The external walls were approved as painted plaster but now proposed to be brick to reflect the houses. The roof is to be upgraded from flat roof membrane to zinc, 3 pitched roof lanterns are proposed for the roof which do not interfere with existing windows in the roofs, WC block is discrete simple form. The uses are compatible with the structure, the form and integrity of the Widows Houses is retained and restored, a number of original features are retained, a number of architecture features that had been lost are reinstated, Heritage Impact Assessments have been carried out, conservation practice will be followed.

- Architectural conservation areas – The proposed development preserves and enhances the appearance of the ACA by restoring the protected structures of Widows Houses and bringing them back to use. The works are sympathetic to the ACA.

- Castlbellingham/Kilsaran Statement – The development complies with the vision for Castlbellingham. It provides a means to encourage tourism whilst restoring historic building of notable value to the character of the area. The change of use of one of the units from residential to commercial would contribute positively to the viability of Castlbellingham's town centre.

- Development complies with regional and national policy. RSES and NPF acknowledge benefits of restoring and reusing historic structures and for sufficient tourist accommodation.
- Castlebellingham has rich built heritage, but the core of the town has been subject to sustained vacancy. Many protected structures are falling into disrepair due to lack of use. The aim for historic cores such as that in Castlebellingham is to encourage activity and vibrancy and return them to their status as attractive places to spend.
- The applicants have sought to bring the Widows House out of disuse and dilapidation, and they have invested strongly in this vision.
- Letters of support are submitted from:
 - Bellingham Castle - There is strong need for short term letting and a pre wedding bridal preparation space in proximity to the Castle, the facilities are essential for the operation and development of their wedding and hospitality services, would contribute to the securing the future use of Bellingham Castle as commercial entity.
 - Kilsaran Parish Select Vestry - As Trustee of the property by deed of appointment of St Mary's Church, Castlebellingham, can confirm that Sunday school was operated from Widows Houses prior to sale in 2016. Confirms the church parishioners have had uninterrupted access with and without vehicles for 60 plus years along said roadway which includes use for parking.

6.3. Planning Authority Response

The planning authority reviewed the third party submission and has no further comment to make in relation to the appeal.

6.4. Observations

Department of Housing, Local Government and Heritage –

- Change of use – no objection to the proposed change of use. Should alterations be required to facilitate introduction of utilities for example

mechanical extraction systems or similar these will be subject to a new planning application.

- WC Block – no objection to the proposed wc block.
- Changes to permitted extension – Minor amendments are proposed to floor plan and design of extension. These changes to floor plan have no impact on architectural heritage. The scale of the proposed development is unchanged. The Department has no objection to the proposed design amendments which have resulted in reducing the need for alterations to the existing fabric of the protected structure.
- Removal of staircases – The current application is proposing the replacement of existing staircases at houses no.s 2 and 3. Under the previous granted permission changes to and removal of staircases were permitted. The application is not overall increasing the impact on the protected structure. The Department has no objection.
- Reconfiguring car parking – The application is proposing two car parking spaces to the front of the existing protected structures. The Department concurs with the planning authority's recommendation to omit these spaces and revert to the originally permitted arrangement. It is recommended that in the event of a grant of permission this element is upheld.
- The proposed alterations, subject to conditions will not negatively impact to the character of the protected structure.
- Conservation works to date are of high standard.
- Should the Commission uphold the planning authority's grant of permission, the Department recommends the reinstatement of conditions no. 2(a-b), the revision of no. 3 and the inclusion of the following conditions:
 - To engage the services of a conservation architect to submit details of works for the written agreement of the planning authority including inspection of site and certification of works in accordance with Architectural Heritage Protection Guidelines 2011.
 - Submit sample of brick in extension and wc block and bonding pattern.

- Submit details for signage to the commercial unit
- In respect of commercial unit, notwithstanding the provisions of the Planning and Development Regulations 2001, no advertisement signs including any signs installed to be visible through windows, advertisement structures, banners, canopies, flags or other projecting elements shall be displayed or erected on the retail unit or within the curtilage of the site unless authorised by further grant of permission.

7.0 **Assessment**

7.1. Having examined the application details and all other documentation on file, including all submissions received in relation to the appeal and inspected the site and having regard to relevant local policies and guidance, I consider that the main issues in this appeal are as follows:

- principle of development
- impact on architectural heritage
- traffic and parking considerations
- other issues

7.2. **Principle of development**

7.2.1. The proposed development relates to the site of a historic building and protected structure containing four small stone built houses, known as 'widow's houses'. Under PA18/753, permission was granted for extension and modifications to these houses and for the conversion of the structure into two houses. The duration of this permission was extended under PA24/155 and PA25/168 until December 2027.

7.2.2. The proposed development is for an amendment to the development permitted under PA18/753 comprising change of use and associated works, so that 'widows house' units 1, 2 and 3 are used for short term letting and 'widows house' unit 4 in conjunction with permitted rear extension is used for commercial use.

7.2.3. The site is located within the settlement of Castlebellingham on lands zoned 'B1 Town or Village Centre' in the Louth County Development Plan (CDP) 2021-2027 where the objective is to support the development, improvement and expansion of

town centre activities. The purpose of the zoning is to protect and enhance the character and vibrancy of existing centres and to provide for and strengthen uses including commercial, residential, cultural and other appropriate uses and allows for a broad range of compatible uses to create an attractive environment to reside, shop, work, visit and invest.

7.2.4. The applicant has set out a list of potential commercial uses envisaged, which include for the use of brides preparing for wedding, Sunday school in association with the adjoining church, gallery for artists, museum, community / church meetings, classes workshops, small scale Sunday market. I am satisfied that the proposed commercial / community uses are acceptable uses in this town centre zoned location.

7.2.5. Three short term letting units are proposed. Residential use is an acceptable use in this town centre zoned location. Objective TOU 27 of the CDP is to facilitate self catering accommodation in existing towns and villages of an acceptable scale. Section 6.5.5 Short Term Lettings of the CDP sets out the objective of the planning authority in relation to short term lettings. The planning authority have assessed the proposed short term letting use and are satisfied that the proposal is acceptable and is in accordance with section 6.5.5. The constrained nature of the development and its unsuitability for long term private housing needs means that the change of use would not result in the loss of long term residential stock. The development is located near tourist attractions and there is demand for tourist accommodation in the area. The site is close to town centre amenities and bus routes. The use is compatible with the protection of existing residential amenity. It is proposed to provide on site parking, waste facilities and amenity space. The proposed refurbishment and revitalisation of a protected structure is welcomed. This is a small scale development proposal that would not undermine the settlement function or the zoning objective.

7.2.6. I note the recently issued Government Circular SPI01/2026 on short term letting which is to be considered in any planning application. The Circular states that in areas outside cities and large towns there will be greater degree of flexibility to grant permission for short term letting that are considered suitable on planning grounds. I am satisfied that the proposed short term letting use is suitable in planning terms.

- 7.2.7. The zoning objective states that the purpose of the zoning is to enhance the character and vibrancy of the centre and to encourage the reuse, adaptation and regeneration of under utilised sites. The structure has been vacant for a number of years and is falling into disrepair. In recent years, conservation and restoration works have been undertaken on site including the repair of the roof and facia and restoration of chimneys. The proposal to reuse the building including the carrying out of works to adapt its use and regenerate the site is in accordance with the objective guidance.
- 7.2.8. In conclusion, I am satisfied that the proposed development comprising works to amend the development permitted under PA18/753 so that the building is used for a residential short term letting unit and a commercial unit is acceptable in principle and is in accordance with the zoning objective, section 6.5.5 in relation to short term letting and objective TOU27 in relation to the provision of self catering accommodation, of the development plan.

7.3. Impact on architectural heritage

- 7.3.1. The appeal submission does not raise issues relating to architectural heritage. However, I consider that this is a substantive issue that requires consideration in the assessment of the proposal put forward for consideration.
- 7.3.2. The building is a protected structure (LHS015-010 and LHS015-011). There are a number of protected structures in close proximity to the site. The site is also within the Castlebellingham Architectural Conservation Area (ACA).
- 7.3.3. The development plan includes objectives for the protection of protected structures including BHC 20 to promote appropriate works, BHC 21 to protect integrity and BHC 24 for the retention of original features.
- 7.3.4. The proposal involves the following works - alteration to the floor plans comprising changes in works to internal walls, staircases and openings, changes to the design of the approved extension, provision of a new WC block, changes to the refuse store location and changes to the car parking and landscaping/ boundary proposals. An Architectural Heritage Impact Assessment (by Emmet Holland Grade 3 conservation architect) is submitted which concludes that the works would ensure the continued use of the building and would result in an overall lessening of the overall impact on the architectural character of the building. The submitted Assessment refers also to

the previous Architectural Heritage Impact Assessment prepared (by Paraic McDevitt Architects Grade 2 conservation architect) which was submitted as part of PA18/753.

- 7.3.5. The Department of Housing, Local Government and Heritage has submitted an observation on the appeal in relation to the impact of the proposed development on the protected structure. The submission is supportive of the proposal and the position adopted by the planning authority subject to conditions.
- 7.3.6. Having considered the documentation submitted in this application and to the documentation available on the Council's website under PA18/753, I consider that the following design changes require particular consideration:
- 7.3.7. Works to staircases
- 7.3.8. In the existing building, each of the four houses are served by their own internal staircase. From a review of the architectural heritage impact assessment reports in the current application and PA18/753, the stairs in houses 2 and 3 are original whereas the other two stairs are more recent and of poorer architectural details. Under permitted PA18/753, the staircase in unit 1 is to be removed and replaced, the staircase in unit 2 is to be sealed over, the staircase in unit 3 is to be retained and the staircase in unit 4 is to be removed. Under PA18/753, the staircases in units 2 and 3 were retained following the report of the Council's Architectural Conservation Officer, who raised concerns that the original proposal to remove these staircases which are original features relating to the original shared entrance lobby to these units, would adversely affect the character of the protected structure. In the current application, the development description states that the proposal is "*replacement of existing staircases at houses no.s 2 & 3*". From a review of the drawings and details, the proposal involves the removal of the staircases in units 2 and 3 and replacement with a newly constructed and relocated staircase including removal of the internal dividing wall between these units. The stairs in units 3 and 4 are to be retained.
- 7.3.9. The proposed removal of the original staircases and separating wall between house no.2 and 3 at ground and first floor would result in the removal of a significant feature of special interest and would result in a fundamental alteration to the original four house plan layout. These features contribute positively to the character of the building and the works will adversely impact on the special interest of the structure.

- 7.3.10. The Architectural Assessment report submitted with the subject application sets out a justification for the removal of the staircases and wall. It states the existing staircases are extremely steep and winding and are an unusable hazard and retaining these will render the first floors of houses 2 and 3 inaccessible, the constrained size of the houses limits their functionality and potential for adaptation and that due to decay it is likely that most of the staircases would need to be replaced.
- 7.3.11. The Architectural Heritage Protection Guidelines for planning authorities sets out guidelines for considering works to protected structures. The Guidelines state that the removal of original features such as staircases and alterations to an original plan form should only be undertaken in exceptional circumstances. The Guidelines also advocate principles of keeping a building in use, repairing rather than replacing and ensuring reversibility of alterations.
- 7.3.12. I note that the submission of the Department of Housing, Local Government and Heritage on the appeal indicates no objection to the removal of existing staircases on the basis that staircases were permitted to be removed under the current application and because there is no overall increase in the impact to the protected structure. In this regard, I am of the view that the removal of the original staircases (which were to be retained) is a substantial alteration in the proposal being put forward.
- 7.3.13. Whilst the works could perhaps be justified, as essential works to allow for the conservation of the whole structure, I am mindful that the CDP includes a specific objective BHC24 which explicitly requires the retention of original features which contribute to the character of a protected structure and states the following: *To require the retention of original features such as windows, doors, renders, roof coverings, and other significant features which contribute to the character of protected structures and encourage the reinstatement of appropriately detailed features which have been lost, to restore the character of protected structures as part of development proposals.*
- 7.3.14. Having regard to this objective, to the Guidelines and to the nature of the proposed use for short stay visitor accommodation which I consider is compatible with the retention of the staircases, I consider that the staircases in units 2 and 3 should be

retained and repaired. This matter can be addressed by condition requiring their refurbishment and retention.

7.3.15. Car parking and landscaping

7.3.16. Under PA18/753 permission was granted for two on site parking spaces and driveway within the eastern garden of the site and a single on site parking space to the front of the western end of the building.

7.3.17. In the current application, the drawings submitted initially with the application altered this layout showing three on site car parking spaces to the front of houses 2,3 and 4 and a single on site parking space at the eastern side of the building with arch path link to external rear terrace. Concerns were raised by the planning authority in relation to the design and potential adverse impact of the front parking on the character of the protected structure.

7.3.18. At further information stage, revised drawings were submitted showing the car parking layout reverting back to a similar layout of PA18/753. The applicants conservation architect raised concerns that the car parking in the eastern garden adversely impacts on the amenity space and raises concerns regarding the potential impact of the path link on existing trees. The planning authority considered that the works would not impact on the trees and granted permission subject to condition 2(b) which states that two parking spaces are to be provided in the eastern garden, permeable surface shall be used and that the front garden areas shall be retained as green space, railings and pedestrian access. I note the submission from the Department of Housing, Local Government and Housing which is in support of the planning authority's recommendation to omit the spaces to the front of the protected structure and is also supportive of conditions 2(a) and (b).

7.3.19. I note that the Architectural Heritage Protection Guidelines states that gardens associated with and in the curtilage or protected structures can be an integral part of the building and careful consideration should be given to proposals to ensure that they do not adversely affect the character of the protected structure.

7.3.20. I consider that the eastern garden area contributes positively to the character and setting of the protected structure. Whilst the permitted development allows for two parking spaces within the garden, the applicant's originally submitted drawings did put forward a proposal to retain the garden with arch path to rear terrace. I consider

that this garden area should be retained and that the original proposal for this area showing one parking space, arch path and eastern garden is more suitable. Along the front boundary, it is desirable to retain the existing front gardens, reinstate the historic front boundary and pedestrian entrances. These measures would safeguard the existing setting of the protected structure. This matter can be addressed by condition.

7.3.21. This revision will result in the reduction in carparking on the site to one. This has relevance to traffic considerations raised in the appeal.

7.3.22. Other works

7.3.23. I consider that the design changes including works to the building, the changes to the extension including change in finishes from plaster to red brick and insertion of roof lanterns, provision of WC block and change to refuse store location are acceptable and would not significantly undermine the integrity of the protected structure.

7.3.24. Conclusion

7.3.25. In conclusion, I consider that the proposal, subject to conditions relating to the staircases in units 2 and 3 and the car parking layout, are in accordance with objectives BHC20, BHC21 and BHC24 in the CDP and would not result in an adverse impact on the character or setting of the protected structure.

7.3.26. The Department of Housing, Local Government and Heritage have recommended conditions as part of their submission on the appeal. Recommended conditions are set out below in relation to engagement of a conservation architect, supervision, samples of materials and signage.

7.4. Traffic and parking considerations

7.4.1. The appellants raise the concern that the proposed development will result in an intensification of traffic that will increase traffic congestion and parking and will compromise traffic safety and result in obstruction of road users.

7.4.2. The site is accessed via a private access road which serves the development site, other dwellings, the avenue to Bellingham Estate and the church and graveyard. At the junction of the private road with the public road, there is a small stone memorial. The private road is paved for shared use of pedestrians and vehicles. There is no

designated parking on the road however there is space for unregulated parking. On day of site visit I observed a small number of vehicles parked on the paved private access road in unregulated manner. I also observed a small number of vehicles traversing the road, all travelling at a low speed. The site is within easy walk of the facilities and services in the town centre.

7.4.3. The Louth County Development Plan sets out objectives and standards in relation to parking. Section 13.16.12 sets out parking standards. For the purposes of parking, the site is in Area 3 (applies to self sustaining towns) and Table 13.11 indicates 'residential dwelling' requires 2 spaces (maximum) per unit. There is no standard for 'commercial' use however noting the anticipated uses put forward by the applicant, 'commercial leisure' is 1 per 30sqm public space, 'church, theatre, cinema, auditorium' is 1 space per 20 seats, 'schools' is 1 per classroom. Based on these standards, I consider that the development generates a demand for at most 4 spaces (1 for the short term let unit and 3 for the 89sqm commercial space). The original proposal shows 4 on site spaces. The permitted development allows for two on site spaces. In the above assessment I have indicated that I consider that in the interests of protecting the protected structure, that parking be limited to one on site space. The standards state that a reduction in car parking may be acceptable when certain criteria are satisfied. This is considered as follows:

7.4.4. *(i) There is sufficient parking available in the vicinity to cater for shortfall*

The site is within the town centre. Across the town centre, I observed parking of cars within designated spaces, parking on the street and also parking across the road and footpaths. On day of site visit, I had no difficulty in parking within a designated space on the street within easy walk of the site. I am satisfied that there is parking available in the vicinity.

7.4.5. *(ii) The nature of the development is such that existing parking spaces in the vicinity could facilitate the dual use of parking spaces, particularly if the development operated at off-peak times. Supporting documentation will be required demonstrating how the dual use will work;*

I am satisfied that existing parking on the roads in the vicinity provides for dual usage of the public parking spaces throughout the day.

7.4.6. *(iii) The public transport links available would reduce the demand for car parking*

The site is located c 200m from the bus stops in the town centre, serving buses to Drogheda, Dublin, Monasterboice and Dundalk, with frequent service throughout the day.

7.4.7. *(iv) The central location of the development is such that the customers/residents/users of the development would be likely to walk or cycle*

This is a central location that facilitates walking and cycling to surrounding areas. It is proposed to provide cycle parking facilities for six spaces on the site.

7.4.8. *(v) There was no off street car parking provided with the existing/previous use of the property and the redevelopment of the property would not result in a significant increase in the car parking requirement.*

The historic use of the site for widows houses did not have on site parking. The pre existing development is served by parking below the CDP standards. I do not consider that the proposal would result in a significant increase in parking requirement.

7.4.9. The CDP requires a Transport Mobility Management Plan to support reduced parking where the quantum is significantly below table 13.11 standards. This is a small scale redevelopment of an existing site and I do not consider that the quantum of parking is significantly below CDP standards.

7.4.10. Having regard to the above, I am satisfied that the site is suitable for reduced parking, as the criteria of section 13.16.11 are satisfied. I further note that objective BHC 26 states that development management guidelines may be relaxed in order to secure the conservation of protected structures. The removal of car parking is justified in the interest of protecting the setting of the protected structure. I am satisfied that the provision of one car parking space via the existing double gate, to serve the proposed development, is acceptable.

7.4.11. I am satisfied that there is space on the roads in the vicinity of the site to facilitate loading associated with the commercial development without interfering with existing traffic movements on the road.

7.4.12. Concerns are raised regarding the capacity of the existing access and roads to accommodate the traffic movements associated with the development. The report of the Council's Executive Engineer (Major Capital Projects & Infrastructure) dated

13/10/2025 indicates no objection to the proposed development. Having regard to the pre existing residential uses on the site, the small scale of the development and the design of the existing road and junction to Main Street which facilitates traffic 'calming' and which is provided with satisfactory sightlines, I am satisfied that the roads and junction at the public road have capacity to accommodate the additional traffic movements associated with the development and that the development would not result in traffic hazard or obstruction of road users.

7.4.13. Issues raised by the appellants regarding the management of traffic and parking within the town or illegal parking is outside of the scope of the application.

7.5. **Other issues**

7.5.1. Legal matters

7.5.2. The appellants have indicated that the road serving the development is privately owned and that the owners of the road do not agree for the use of the road for commercial uses. In this regard, I note that the development relates to a pre existing development with residential uses. The owners of the existing development can access their site via the existing access road. There is no change in this existing arrangement.

7.5.3. Any further legal dispute is considered a civil matter and outside the scope of the planning appeal. I note also the provisions of section 34(13) of the Planning and Development Act 2000, as amended which states: "*A person shall not be entitled solely by reason of a permission under this section to carry out any development.*"

7.5.4. Procedural matters

7.5.5. The appeal submission states that the appeal is not valid and the appeal is not accompanied by the planning authority's acknowledgement of the appellant's initial objection as per section 127 of the Planning and Development Act 2000, as amended.

7.5.6. Section 127(1)(e) states that an appeal shall "*in the case of an appeal under section 37 by a person who made submissions or observations in accordance with the permission regulations, be accompanied by the acknowledgement by the planning authority of receipt of the submissions or observations*"

- 7.5.7. The appeal includes a copy of a letter from the planning authority dated 10th October 2025 to the appellant notifying of the planning authority's decision. The letter refers to the submission received from the appellant in relation to the planning application.
- 7.5.8. From a review of the file, I am satisfied that the appellant submitted a third party observation on the application to the planning authority during the public consultation period. The Council's Acknowledgement of Submission is attached on file.
- 7.5.9. I am satisfied that the appeal satisfies the provision for making an appeal under section 127(1) of the Planning and Development Act 2000 as amended.

8.0 Appropriate Assessment Screening

- 8.1. I have considered the proposed development in light of the requirements of S177U of the Planning and Development Act 2000 (as amended). The closest Natura 2000 sites are the Dundalk Bay SPA and Dundalk Bay SAC c 1.6km from the site and Stabannan-Braganstown SPA c 3.2km from the site.
- 8.2. In accordance with Section 177U of the Planning and Development Act 2000 (as amended) 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 in view of the conservation objectives of those sites and Appropriate Assessment is therefore not required. This determination is based on:
- the small domestic scale and nature of the proposed development,
 - the lack of any significant ecological or hydrological pathways between the development and any European site,
 - the distance from any European site.
- 8.3. I conclude that on the basis of objective information, the proposed development would not have a likely significant effect on any Natura 2000 site either alone or in combination with other plans or projects. Likely significant effects are excluded and therefore Appropriate Assessment (under section 177V of the Planning and Development Act 2000 as amended) is not required.

9.0 Water Framework Directive Screening

- 9.1. I have considered the proposed development in light of the requirements of the Water Framework Directive. A screening assessment for WFD is attached as an appendix to this report.
- 9.2. The site is located within the Newry, Fane, Glyde and Dee WFD catchment and the Glyde_SC_030 sub catchment.
- 9.3. The site is located c 146m from the Glyde river and overlays the Louth groundwater body. The Glyde river is of 'moderate' WFD status and is 'at risk'. The Louth groundwater body has 'good' WFD status and is 'not at risk'.
- 9.4. I have assessed the proposed development and have considered the objectives as set out in Article 4 of the Water Framework Directive which seeks to protect and where necessary, restore surface and ground water waterbodies in order to reach good status (meaning both good chemical and good ecological status), and to prevent deterioration. Having considered the nature, scale and location of the proposed development, I am satisfied that it can be eliminated from further assessment because there is no conceivable risk to any water bodies either qualitatively or quantitatively.
- 9.5. The reason for this conclusion is as follows:
- the nature of the proposed development which relates to change of use and extension of an existing building,
 - the low risk of potential significant impacts arising from the proposed changes of use with proposed drainage measures including use of best construction practice methods, disposal of foul effluent to the public waste water treatment plant (which has capacity) and the proposal to dispose of storm water via the existing arrangement which is to the public network.
- 9.6. 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 either qualitatively or quantitatively or on a temporary or permanent basis or otherwise jeopardise any water body in reaching its WFD objectives and consequently can be excluded from further assessment.

10.0 Recommendation

10.1. I recommend that permission for the proposed development be granted subject to conditions.

11.0 Reasons and Considerations

11.1. Having regard to

- (a) The nature, scale and design of the proposed development and the pattern of existing development in the area,
- (b) The B1 Town Centre zoning of the site under the Louth County Development Plan 2021-2027 and the objectives of this plan,
- (c) The Architectural Heritage Protection Guidelines for planning authorities

It is considered that, subject to compliance with the conditions set out below, the proposed development would not seriously injure the residential or visual amenities or the natural environment of the area or of property in the vicinity, would not be prejudicial to public health or traffic safety and would not adversely affect built heritage or the character and setting of the protected structure on site. The proposed development would, therefore be in accordance with the proper planning and sustainable development of the area.

12.0 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 received by the planning authority on 23 rd September 2025, 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.
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	<p>Reason: In the interest of clarity</p>
2	<p>Apart from any departures specifically authorised by this permission, the development shall comply with the conditions of the parent permission Register Reference 18/753 unless the conditions set out hereunder specify otherwise. This permission shall expire on the same date as the parent permission.</p> <p>Reason: In the interest of clarity and to ensure that the overall development is carried out in accordance with the previous permission(s).</p>
3	<p>The proposed development shall be amended as follows:</p> <p>(a) The existing staircases to house no. 2 and 3 shall be retained, repaired and refurbished. The removal of the unaffected section of internal dividing wall between these units is permitted. The room layout shall be revised to accommodate the retention of the staircases.</p> <p>(b) The development site shall be provided with one on site car parking space only. This shall be perpendicular to the existing double gateway located at the eastern end of the front boundary.</p> <p>(c) The layout for the car parking space and its entrance, amenity green space, gothic arch path, bin store and bicycle area at the eastern side of the building shall be as shown in 'Proposed Plans' drawing no. 2304-PP04 submitted to the planning authority on 19th June 2025. The location of the existing pedestrian access points and boundary to the front of the building shall be retained as shown in the 'Existing Ground Floor Plan' drawing no. 2304-PP03 submitted to the planning authority on 19th June 2025.</p> <p>Revised drawings showing compliance with these requirements shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.</p>

	<p>Reason: In the interests of visual amenity and to protect built heritage.</p>
4	<p>The short-term letting unit shall be restricted to visitor stays for no more than 14 days at a time.</p> <p>Reason: To ensure that the proposed development is used for short-term letting, in the interests of orderly development and clarity.</p>
5	<p>Prior to the commencement of development on the Protected Structure the applicant/developer shall submit for the written agreement of the planning authority confirmation that:</p> <p>(a) the development will be monitored by a suitably qualified architect with conservation expertise and accreditation and</p> <p>(b) competent site supervision, project management and crafts personnel will be engaged, suitably qualified and experienced in conservation works.</p> <p>Reason: In the interest of the protection of architectural heritage (in accordance with the provisions of the Architectural Heritage Protection Guidelines for Planning Authorities).</p>
6	<p>Prior to the commencement of development, the applicant/developer shall submit, for the written agreement of the planning authority, a detailed method statement covering all works proposed to be carried out, including:</p> <p>(a) a full specification, including details of materials, methods and boundary treatments and signage, to ensure the development is carried out in accordance with current Conservation Guidelines issued by the Department of Arts, Heritage & the Gaeltacht,</p> <p>(b) methodology for the recording and/or retention of concealed features or fabric exposed during the works,</p>

	<p>. (c) details of features to be temporarily removed/relocated during construction works and their final re-instatement,</p> <p>. (d) protection of special features during the construction works,</p> <p>. (e) materials/features of architectural interest to be salvaged,</p> <p>.</p> <p>. Details to be accompanied by drawings of an appropriate scale of not less than [1:50] in respective of any specific element/ detail.</p> <p>. Reason: In the interest of the protection of architectural heritage in accordance with the provisions of the Architectural Heritage Protection Guidelines for Planning Authorities.</p> <p>.</p>
7	<p>. The developer shall engage a suitably qualified (licensed eligible) archaeologist to monitor (licensed under the National Monuments Acts) all site clearance works, topsoil stripping, groundworks, associated with the development as appropriate, following consultation with the National Monument Service (NMS).</p> <p>. Prior to the commencement of such works the archaeologist shall consult with and forward to the NMS a method statement for written agreement.</p> <p>. The use of appropriate tools and/or machinery to ensure the preservation and recording of any surviving archaeological remains shall be necessary.</p> <p>. Should archaeological remains be identified during the course of archaeological monitoring, all works shall cease in the area of archaeological interest pending a decision of the planning authority, in consultation with the National Monuments Service, regarding appropriate mitigation [preservation in-situ/excavation].</p> <p>. The developer shall facilitate the archaeologist in recording any remains identified. Any further archaeological mitigation requirements specified by</p>

	<p>the planning authority, following consultation with the National Monuments Service, shall be complied with by the developer.</p> <p>Following the completion of all archaeological work on site and any necessary post-excavation specialist analysis, the planning authority and the National Monuments Service shall be furnished with a final archaeological report describing the results of the monitoring and any subsequent required archaeological investigative work/excavation required. All resulting and associated archaeological costs shall be borne by the developer.</p> <p>Reason: To ensure the continued preservation [either in situ or by record] of places, caves, sites, features or other objects of archaeological interest.</p>
8	<p>A comprehensive boundary treatment and landscaping scheme shall be submitted to and agreed in writing with the planning authority, prior to commencement of development. The scheme shall be prepared by person with expertise in the conservation of architectural heritage. This scheme shall include the following:-</p> <ul style="list-style-type: none"> (a) details of all proposed hard surface and/or permeable surface finishes (b) proposed locations of trees and other landscape planting in the development, including details of proposed species and settings; (c) details of proposed boundary treatments at the perimeter of the site, including heights, materials and finishes. <p>The boundary treatment and landscaping shall be carried out in accordance with the agreed scheme.</p> <p>Reason: In the interest of visual amenity and the protection of architectural heritage.</p>

9	<p>Drainage arrangements, including the attenuation and disposal of surface water, shall comply with the requirements of the planning authority for such works and services.</p> <p>Reason: In the interest of public health and surface water management.</p>
10	<p>Site development and building works shall be carried out only between the hours of 0700 to 1900 Mondays to Fridays, inclusive, between 0800 to 1400 on Saturdays and not at all on Sundays or public holidays. Deviation from these times shall only be allowed in exceptional circumstances where prior written agreement has been received from the planning authority.</p> <p>Reason: To safeguard the amenity of property in the vicinity.</p>
11	<p>In respect of the proposed commercial unit, notwithstanding the provisions of the Planning and Development Regulations 2001, or any statutory provision amending or replacing them, no advertisement signs including any signs installed to be visible through windows, advertisement structures, banners, canopies, flags or other projecting elements shall be displayed or erected on the retail unit, or within the curtilage of the site, unless authorised by a further grant of permission.</p> <p>Reason: In the interest of visual amenity and the protection of architectural heritage.</p>

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.

Aisling MacNamara
Planning Inspector

9th February 2026

Appendix 1: Form 1 - EIA Pre-Screening

Case Reference	500209
Proposed Development Summary	Amendments to current planning approval ref no. 18753 to include change of use of house 1-3 from residential to short term letting and all associated site works. Protected Structures LHS-015-010 & LHS-015-011.
Development Address	Widows Houses, Castlebellingham, Co. Louth.
In all cases check box /or leave blank	
1. Does the proposed development come within the definition of a 'project' for the purposes of EIA? (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.
2. Is the proposed development of a CLASS specified in Part 1, Schedule 5 of the Planning and Development Regulations 2001 (as amended)?	
<input type="checkbox"/> Yes, it is a Class specified in Part 1. EIA is mandatory. No Screening required. EIAR to be requested.	State the Class here
<input checked="" type="checkbox"/> No, it is not a Class specified in Part 1. Proceed to Q3	
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?	
<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 development under Article 8 of the Roads Regulations, 1994. No Screening required.	No screening required.
<input type="checkbox"/> Yes, the proposed development is of a Class and meets/exceeds the threshold. EIA is Mandatory. No Screening Required	

<input type="checkbox"/> Yes, the proposed development is of a Class but is sub-threshold. Preliminary examination required. (Form 2) OR If Schedule 7A information submitted proceed to Q4. (Form 3 Required)	

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"/>	Screening Determination required (Complete Form 3)
No <input checked="" type="checkbox"/>	Pre-screening determination conclusion remains as above (Q1 to Q3)

Inspector: _____ Date: _____

Appendix 2: Water Framework Directive Screening

WFD IMPACT ASSESSMENT STAGE 1: SCREENING							
Step 1: Nature of the Project, the Site and Locality							
An Bord Pleanála ref. no.	500209	Townland, address	Widows Houses, Castlebellingham, Co. Louth.				
Description of project	Amendments to current planning approval ref no. 18753 to include change of use of house 1-3 from residential to short term letting and all associated site works. Protected Structures LHS-015-010 & LHS-015-011.						
Brief site description, relevant to WFD Screening,	Existing developed site with historic building (4 residential units). Located within built up urban area. No surface water features on site.						
Proposed surface water details	Public sewer / drain						
Proposed water supply source & available capacity	Existing – public mains						
Proposed wastewater treatment system & available capacity, other issues	Existing – public sewer						
Step 2: Identification of relevant water bodies and Step 3: S-P-R connection							
Identified water body	Water body name(s) (code)	Distance to (m)	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	GLYDE_070	146m	Moderate 2019-2024	At risk	Agriculture River urban run off	Foul drainage Storm water drainage	
Groundwater	Louth	underground	Good 2019-2024	Not at risk	-	Construction	
Step 3: 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)	Determination** to proceed to Stage 2. Is there a risk to

						Detail	the water environment? (if 'screened' in or 'uncertain' proceed to Stage 2.
	Drainage to ground	Louth	underground	Pollution	Standard best construction	No	Screened out
OPERATIONAL PHASE							
	Foul drainage	GLYDE_070	Via Castlebelling ham Wastewater treatment plant	pollution	This development is for change of use of existing structure There is no significant change in loading. There is capacity in the WWTP (source: Wastewater Treatment Capacity Register www.water.ie)	No	Screened out
	Storm water drainage	GLYDE_070	Via urban storm water network	pollution	The proposal relates to an existing developed site. There is no significant change in surface water disposal measures.	No	Screened out
DECOMMISSIONING PHASE							
	N/A						