



An
Coimisiún
Pleanála

Inspector's Report PL-500510-WD-25

Development	Demolition of existing structures and construction of three dwellings.
Location	Rocky Road, Ardmore, Co. Waterford
Planning Authority	Waterford City and County Council
Planning Authority Reg. Ref.	25/60048
Applicant(s)	Shane Houlihan
Type of Application	Permission
Planning Authority Decision	Refuse Permission
Type of Appeal	First Party Normal Planning Appeal
Appellant(s)	Shane Houlihan
Observer(s)	Richard Lincoln
Date of Site Inspection	28 th May 2026
Inspector	Phillippa Joyce

Contents

1.0 Site Location and Description	3
2.0 Proposed Development	3
3.0 Planning Authority Decision	4
4.0 Planning History.....	6
5.0 Policy Context.....	7
6.0 The Appeal	12
7.0 Environmental Impact Assessment.....	16
8.0 Planning Assessment	16
9.0 Appropriate Assessment.....	24
10.0 Water Status Impact Assessment.....	25
11.0 Recommendation	26
12.0 Reason and Considerations	26
Appendix 1: Environmental Impact Assessment – Pre-Screening	28
Appendix 2: Environmental Impact Assessment – Preliminary Examination	29

1.0 Site Location and Description

- 1.1. The appeal site is located on Rocky Road, at the junction with Cliff Road, in the east of Ardmore village. The site is rectangular in configuration and indicated as measuring c.0.035ha.
- 1.2. The site accommodates three structures; a single storey dwelling, a storage unit, and a public toilet block. The dwelling and storage unit front onto Rocky Road, while the public toilets address both Rocky Road and Cliff Road. The site occupies a prominent corner location in the village, being adjacent to the coastline and the historic urban core (Main Street is c.94m to the northwest).
- 1.3. The eastern section of Rocky Road, within which the site is located, accommodates a terrace row of vernacular structures. These include, predominantly, single storey and two storey dwellings, with one three storey dwelling at the western end of the road close to the junction with Coffey Lane. The topography of the road is notable, with ground levels rising steeply in a westerly direction from the site/ coastline towards the junction.

2.0 Proposed Development

- 2.1. The proposed development comprises the following elements:
 - Demolition of an existing dwelling, a storage unit and a public toilet block (combined gross floorspace of c.149sqm).
 - Construction of three terrace dwellings including two 2 storey, 3-bed terrace houses and one 3 storey 3-bed house (combined gross floorspace of c.439sqm), with connection to public services and all associated site works.
- 2.2. During the assessment of the application, Further Information (FI) was requested by the planning authority (see Section 3.0 below for details). In response to the request, revisions were made to the proposed development, including a reduction in principal height (c.0.8m), design changes to the elevations and external finishes (omission of brick).

- 2.3. In the interests of clarity for the Commission, the development as proposed at the FI response stage and assessed by the planning authority is subject of the assessment of this appeal.

3.0 Planning Authority Decision

3.1. Summary of the Decision

- 3.1.1. The application was lodged with the planning authority on 29th January 2025. On 25th March 2025, the planning authority requested FI, which the applicant responded to on 18th September 2025 (requiring publication of notices). On 24th November 2025, the planning authority issued a Notification of Decision to Refuse Permission for the proposed development, citing one reason.

3.2. Planning Authority Reports

3.2.1. Planner's Reports

Initial Assessment

The planner's report includes an assessment of the proposed development focusing on:

- building height (excessive),
- external finishes (at odds with character of village),
- visual and architectural heritage sensitivities of the site (prominent coastal location, within the Architectural Conservation Area (ACA)).

The initial assessment concludes with a recommendation that FI be requested from the applicant seeking:

- Revisions to the design, height and scale of the proposed development.
- Submission an Architectural Heritage Impact Assessment (AHIA), to include an assessment of the proposed external finishes.
- Design of fenestration in habitable rooms to prevent undue overlooking.
- Revisions to site layout to achieve the required footpath width, public lighting, and junction sightlines.

Further Information Assessment

On assessment of the FI response, the planning authority found the responses relating to design and architectural heritage to be unsatisfactory:

- Inadequate revisions made to the height, elevational treatment, and external finishes of the proposed development.
- Continues to be at odds with the setting and character of the village, adverse visual impact on the ACA.
- AHIA does not represent best practice, visual impact in the ACA not adequately assessed, appropriateness of proposed external finishes/materials not adequately assessed.

The requirements for EIA and AA are screened out.

Recommendation

The planning authority concludes that the proposed development has the potential to negatively impact on the historic streetscape, historic core and character of the village, and would be contrary to policy objectives in the development plan.

Permission is refused for one reason, as follows:

- 1. It is the policy of the Council as expressed in Objective BH05 of the Waterford City and County Development Plan 2022-2028 to preserve the special character of places, areas, groups of structures setting out Architectural Conservation Areas (ACA) and to protect Architectural Conservation Areas from any works which would visually or physically detract from the special character of the area. The proposed development, by reason of its excessive height when viewed from Cliff Road, its design, bulk and massing, would constitute a visually discordant feature at a prominent location that would be detrimental to the historic character and setting of Ardmore village, which is a stated objective of the Council to preserve.*

The proposed development would set an undesirable precedent for similar types of development in the area, would contravene the policy and objectives of the Waterford City and County Council Development Plan 2022-2028 and would therefore be contrary to the proper planning and sustainable development of the area.

3.2.2. Other Technical Reports

Conservation Officer: Initial report recommends permission be refused. FI report recommends permission be refused.

Environment Section: No objection subject to condition.

District Engineer: Initial report refers to requirements for sightlines, road signage, footpath, public lighting, stormwater connections. FI report no objection subject to condition.

3.3. Prescribed Bodies

- 3.3.1. No submissions from prescribed bodies were received by the planning authority during the assessment of the planning application.

3.4. Third Party Observations

- 3.4.1. The planning authority indicates one third-party observation was received during the assessment of the application, and summarises the key issues raised (objection to the scale and design of the proposal, would welcome a sensitively designed proposal which would respect the character of Rocky Road, Cliff Road, the fishermen's cottages and the ACA).

4.0 Planning History

Appeal Site

PA Ref. 20/129 (not implemented)

Extension of duration permission granted in June 2020 to P. and M. Whyte in relation to PA Ref. 14/600268.

PA Ref. 14/600268 (not implemented)

Permission granted in April 2015 to P. and M. Whyte for the replacement of an existing single storey dwelling with 2 no. two storey 3 bed residential units.

5.0 Policy Context

5.1. Local Context

Waterford City and County Development Plan 2022-2028

- 5.1.1. Waterford City and County Development Plan 2022-2028 (CDP) is the applicable development plan for the assessment of the appeal case. The CDP comprises several volumes including Volume 1: Written Statement, Volume 2: Development Management Standards, Volume 3: Appendices, and Volume 4: Maps.
- 5.1.2. Relevant policies, objectives, and designations to the proposal include the following:

- Chapter 11: Heritage (Volume 1)

- Objective BH 05: Architectural Conservation Areas

It is the policy of the Council to:

- *Achieve the preservation of the special character of places, areas, groups of structures setting out Architectural Conservation Areas (ACA).*
- *Protect the special heritage values, unique characteristics and distinctive features, such as shopfronts within the ACA from inappropriate development which would detract from the special character of the ACA.*
- *Prohibit the demolition of historic structures that positively contributes to the distinctive character of the ACA.*
- *Encourage the undergrounding of overhead services and the removal of redundant wiring/ cables within an ACA and to assess all further cable installations against its likely impact on the character of the ACA as the cumulative impact of wiring can have a negative impact on the character of ACAs.*
- *Provide guidelines on appropriate development to retain its distinctive character; and protect elements of the streetscape such as rubble stone boundary walls, planting schemes and street furniture such as paving, post boxes, historic bollards, basement grills, street signage/plaques, etc. which make a positive contribution to the built heritage.*

- *Retain or sensitively reintegrate any surviving items of historic street furniture and finishes such as granite kerbing and paving that contribute to the character of an ACA.*
- Objective BH 06: Architectural Heritage Impact Assessment

It is the policy of the Council when considering development which may ... have an impact on an ACA, that the proposal be accompanied by an Architectural Heritage Impact assessment (AHIA) detailing the potential impact of the development on the architectural heritage. The report should be compiled in accordance with the details set out in Appendix B of the Architectural Heritage Protection Guidelines for Planning Authorities, Department of the Environment.
- Policy in Section 11.6: Design

The design of any proposed new development in a historic core should respect the existing character of its setting and blend in harmoniously sited and designed sympathetically so as not to detract from the setting. New developments should consider the existing building heights, vertical and horizontal lines, window size and fenestration in the vicinity, building materials and elevations of the existing structures. In some cases, high quality contemporary design can be acceptable.
- Objective BH 11: Maintaining and Enhancing Special Character

It is the policy of the Council to protect ... historic structures within ACA, from any works which would visually or physically detract from the special character of the ... streetscape or landscape setting of the ACA.
- Objective BH 12: Settings and Vistas

It is the policy of the Council to ensure the protection of the settings and vistas of ... historic buildings within and adjacent to ACAs from any works which would result in the loss or damage to their special character.
- Objective BH 13: Vacant and Derelict Sites

It is the policy of the Council to encourage the sensitive redevelopment of vacant or derelict sites within the ACA and historic cores of the city, towns

and villages whilst promoting a high standard design which respects urban plots, roof lines vistas and streetscape.

- Section 10: Architectural Conservation Areas (Volume 2, applicable extracts from Table 10.1)
 - Demolitions: Where buildings have a negative impact on the character of an ACA, demolition of existing and replacement with buildings of more appropriate design may be desirable...
 - Replacement Dwellings: Where replacement buildings are deemed acceptable in ... villages, new buildings should consider existing plot size, where possible, in order to retain the existing grain, character and setting of the streetscape.
 - New Buildings: All new buildings should contribute to the visual enhancement of the area while respecting its physical character.
 - Pastiche or replication of historic design is not always appropriate, and high quality contemporary architectural design is acceptable in some cases.
 - The elevation treatment of the new development should be well proportioned and built having respect to its context.
 - Buildings should follow the eaves heights, roof pitches and building lines which predominate in the streetscape and should employ windows of matching proportions and alignment. Materials should be of good visual quality and durability.
- Section 11.0: Zoning and Land Use (Volume 2)
 - The site is zoned as RV 'Rural Village' which seeks to *'Protect and promote the character of the Rural Village and promote a vibrant community appropriate to available physical and community infrastructure'* (Table 11.1).
 - Residential scheme is a permitted in principle use class on RV zoned lands (Table 11.2).

- Appendix 8: Landscape and Seascape Character Assessment (Volume 3, also Volume 4, Natural Heritage Map)

- Section 4.1(a) Most Sensitive Areas and Section 4.1(b) Areas Designated as Most Sensitive

The site is designated as a 'Most Sensitive Area' landscape type due to its coastline location (as per Map A8.3). Policy for development within which states: *'..To be considered for permission, development in or in the environs of these areas must be shown not to impinge in any significant way upon its character, integrity or uniformity when viewed from the surroundings. Particular attention should be given to the preservation of the character and distinctiveness of these areas as viewed from scenic routes and the environs of archaeological and historic sites'.*

- Appendix 10: Architectural Conservation Areas (Volume 3, applicable extracts from Ardmore ACA)

- Special Character – *The historic core of the village of Ardmore has a very distinctive character enhanced by its coastal setting... Along the Main Street are modest single and two storeys rendered terraced houses that date mainly from the early 19th century... The undulating roof lines and modest vernacular detailing contribute to the character of the village... It is considered that the ACA of Ardmore is of historic, social, cultural, archaeological and architectural merit.*
- Development Management Standards – *Walls: The majority of historic buildings within the ACA have a rendered finish. Roofs: The stepped roofscape of Ardmore is part of its special character. Historic roofs were mainly pitched slate roofs... Height: The predominant height of existing buildings shall be respected, and any proposals should harmonise with the existing streetscape in particular on Main Street, Rocky Road, Cliff Road, New Line...*

5.2. National Context

- 5.2.1. National policy context includes that set by the applicable section 28 Ministerial planning guidelines (my abbreviation in brackets):

- Architectural Heritage Protection Guidelines for Planning Authorities, 2011
(Architectural Heritage Guidelines)
 - Paragraph 3.10.1: Proposals for New Development within an ACA – *When it is proposed to erect a new building in an ACA, the design of the structure will be of paramount importance. Generally, it is preferable to minimise the visual impact of the proposed structure on its setting. The greater the degree of uniformity in the setting, the greater the presumption in favour of a harmonious design. ... Where there is an existing mixture of styles, a high standard of contemporary design that respects the character of the area should be encouraged. The scale of new structures should be appropriate to the general scale of the area and not its biggest buildings. The palette of materials and typical details for façades...should generally reinforce the area's character.*
 - Paragraph 3.10.2: Proposals for Demolition within an ACA – *Where it is proposed to demolish a structure that contributes to the character of an ACA...the onus should be on the applicant to make the case for demolition. The planning authority should consider the effect ... on the character of the area... When it is proposed to demolish an undistinguished building in an ACA, the proposed replacement should not ... adversely affect the character of the area.*
 - Appendix B: Architectural Heritage Impact Assessments – *Elements of the Assessment: Written Account, Core Data, Short Description of the Structure, Analysis of the Existing Structure, Drawings, Maps, Photographs, Anticipating Concealed Features, Impact Assessment, Recommendations and Conclusions.*

5.3. Natural Heritage Designations

- 5.3.1. The appeal site is not located in or immediately adjacent to a European site, a Natural Heritage Area (NHA) or a proposed NHA (pNHA).
- 5.3.2. The European site designations in proximity to the appeal site include (as measured at closest proximity between boundaries):

- Helvick Head to Ballyquin SPA (site code: 004192) is c.3.45km to the northeast.
- Blackwater Estuary SPA (site code: 004028) and Blackwater River (Cork/Waterford) SAC (site code: 002170) are c.6.25km to the west.

5.3.3. The pNHA designations in proximity to the appeal site include those associated with certain SAC designations:

- Ballyeelinan Wood pNHA (site code: 001692) is c.3.42km to the northeast.
- Blackwater River And Estuary pNHA (site code: 000072) is c.6.24km to the west.

6.0 The Appeal

6.1. Grounds of Appeal

6.1.1. This is a first-party appeal against the decision of the planning authority to refuse permission for the proposed development. The appeal grounds include the following:

Consistency with Objective BH05

- Submits final design satisfies all of requirements of objective and of national planning guidance – respect the area, contribute to its character and distinctiveness, contemporary design.

Height is Modest and Fully Contextual

- Proposed demolition of three existing derelict and deteriorated structures and their replacement with a terrace of three high-quality residential dwellings.
- Proposal has been carefully designed to respond to the prominent corner location, the sloping topography, and the established architectural character of the ACA.
- Scheme is articulated as three distinct building forms, each clearly expressed and stepped in height and massing to follow the natural fall of the road.

- Two dwellings have two-storey pitched-roof forms, reflecting the prevailing scale, roof profile, and rhythm of development along Rocky Road, and providing continuity with the established streetscape.
- Third dwelling is a modestly scaled three-storey element, its apparent height is carefully moderated by its position within the terrain and by the articulation of its facades.
- Corner building is intentionally treated as a civic marker, responding to the change in street direction and reinforcing the spatial definition of the junction.
- Architecturally, the proposal is contemporary but context responsive.
- Changes in plane, depth, and material used to reduce bulk, articulation ensures that the development sits comfortably within its setting.

Massing is Articulated, Stepped and Not Bulky

- Massing carefully composed to avoid any sense of bulk or visual dominance within the ACA.
- Scheme is articulated as three clearly legible building forms, each expressed as an individual dwelling rather than as part of a single monolithic structure.
- Buildings are stepped in plan and section to follow the natural fall of the site.
- Narrow-bay proportions have been employed throughout, ensuring that the development does not appear overbearing or visually intrusive.

Material Palette is Restrained and ACA-Appropriate

- Proposed material palette has been deliberately limited and carefully selected to ensure compatibility with the character of the ACA.
- Local natural stone, nap render plaster and natural slate roofing are already prevalent within the village.
- Use of standing-seam zinc is proposed in limited and recessive locations, functioning as a contemporary accent rather than a dominant element.
- Restrained palette contributes to the legibility of the individual building forms, breaking down mass, ensuring durability and suitability for the exposed coastal environment.

- Proposal includes for the use of high-quality contemporary materials, contextually appropriate and sensitively applied.

Balanced Solid-to-Void Ratio

- Final design carefully balances solid wall elements and glazed openings, ensuring the development does not present as visually lightweight or overly transparent.
- Glazing is controlled in scale and proportion, with a strong emphasis on vertical window proportions, reflecting traditional architectural rhythms.
- Recessed balconies and privacy screening elements further reduce visual prominence and prevent any perception of excessive openness.
- Proposal's contemporary architectural expression is entirely appropriate within the ACA.
- Proposal does not rely on pastiche or imitation, and responds to its context through scale, massing, roofline modulation.
- Proposal is a sensitive and appropriate contemporary intervention, respects the special character of the ACA, reflects the evolving architectural character, allows for architectural evolution.

Visual Impact from Cliff Road

- Visual impact has been assessed from key public viewpoints (Dwg No.: H-08), particularly Cliff Road and the promenade, which form an important approach to Ardmore village.
- Photomontages indicate a cohesive, well-articulated development that responds positively to the sloping topography and coastal setting.
- Massing is deliberately broken and articulated, no single element appears visually dominant from oblique or longer-distance views, restrained palette of materials allows the development to integrate comfortably with the existing built fabric and sea wall.
- Comer element, located at the lowest point of the site, reads as a contextual marker rather than an intrusive feature.

- Proposal represents a clear visual improvement, replaces a neglected site with a carefully scaled development, enhances the approach to Ardmore, contributes positively to the character of the ACA.

Architectural Heritage Impact Assessment

- States the AHIA was AHIA was prepared in accordance with Section 6.9 of the Architectural Heritage Protection Guidelines for Planning Authorities.
- Proposal assessed in the context of the Ardmore ACA, nearby protected structures, and the wider historic setting of the village.
- The AHIA finds the existing structures do not contribute positively to Ardmore's architectural or historic character and their demolition has a neutral to positive impact on the streetscape and the ACA.
- Proposal is not anticipated to have any negative impact on .nearby protected structures, the ACA, or the wider heritage setting of Ardmore village.

Stepped Building Pattern and Roofline Transition around Site

- Rocky Road has a clearly established and legible pattern of stepped building heights, Main Street streetscape transitions in a graduated manner from single-storey cottages to a two-storey structure adjacent to the junction.
- Progression of scale and roof height is a defining characteristic of the ACA and contributes significantly to the rhythm, enclosure and coherence of the street.
- Proposal extends and reinforces this established pattern at the lower end of Rocky Road.
- Two-storey dwellings continue the prevailing scale, roof profile and domestic rhythm of the street, and the modest three storey corner unit is positioned at the lowest point of the site.

6.2. Planning Authority Response

6.2.1. No response has been received from the planning authority on the appeal.

6.3. Observations

6.3.1. An observation has been made on the appeal case by R. Lincoln with an address indicated on Cliff Road, Ardmore. The key issues raised include the following:

- Prominent position of the site.
- Proposal has a negative economic and social benefit to the area.
- Architectural merit of the existing structures within the site.
- Detracts from nearby protected structures and archaeological heritage.
- Gentrification of Ardmore village, exacerbated by the proposed development.
- Demands on car parking availability.
- Requirement for pedestrian footpath, public lighting, and a construction plan.

7.0 Environmental Impact Assessment

7.1. The proposal is of a class of development identified in Part 2 of Schedule 5 of the Planning and Development Regulations 2001, as amended (2001 Regulations) for the purposes of Environmental Impact Assessment (EIA). Accordingly, I have undertaken a pre-screening exercise and preliminary examination of the proposed development (see Appendix 1 and Appendix 2 respectively of this report below).

7.2. By taking into account the nature and scale of the proposed development, the location of the site, the existing pattern of development in the vicinity, the information and reports submitted as part of the application and appeal, and the criteria set out in Schedule 7 of the 2001 Regulations, I have concluded that there is no real likelihood of significant effects on the environment arising from the proposed development, and that the need for an EIA and the submission of an EIAR is not required.

8.0 Planning Assessment

8.1. Having reviewed the appeal, examined the documentation on the case file, inspected the site, and had regard to the relevant policy context and planning guidance, I consider that the main issues in the appeal to be as follows:

- Principle of Development
- Design and Layout

- Architectural Heritage
- Other Matters

I propose to address each item in turn below.

8.2. Principle of Development

- 8.2.1. The proposed development comprises the demolition of three structures at the site and the construction of a terrace of three dwellings. The site is zoned as 'Rural Village', 'residential scheme' is a permissible use class therein and, subject to normal planning considerations, the proposal is acceptable in principle.

8.3. Design and Layout

- 8.3.1. Presently, the subject site accommodates three single storey structures, referred to in the application documents as a dwelling, storage unit and public toilet block, and described as vacant, derelict, deteriorating, and of no architectural heritage value.
- 8.3.2. Following review of the case details and my site inspection, I note the dwelling fronting onto Rocky Road is a single storey, three-bay vernacular cottage, which appears in moderate to good structural condition. The third-party observation on the appeal describes the adjacent building to the east as the old fire station and the building at the junction with Cliff Road as public toilets within the old coast guard boat house. The latter building features distinctive stonewalls (including quality-cut quoin stones) which frame the southeastern corner of the site (also commented on by the observer and planning authority's Conservation Officer).
- 8.3.3. The topography of Rocky Road is notable as the ground levels decrease from the west to the east. The decreasing ground levels are reflected in the streetscape whereby the structures within the site, albeit all single storey, decrease in relative height towards the eastern boundary/ street frontage onto Cliff Road.
- 8.3.4. The proposed development seeks the demolition of the existing buildings and their replacement with three dwellings (2-3 storeys in height) in a terrace row. Two 2 storey dwellings address Rocky Road and the 3 storey dwelling fronts onto Cliff Road. The principal dimensions of the terrace row include a width of c.25.3m along Rocky Road, a depth of c.13.6m along Cliff Road, and a height of c.9.5m at the corner (3 storey dwelling).

Design

- 8.3.5. With regard to design, the proposal features a modern architectural approach. The two 2 storey dwellings fronting onto Rocky Road are asymmetrical in design, with recessed front doors, recessed first floor level balconies with louvres and glass balustrades, a range of window and door opens of varying styles and proportions, and a mix of external finishes (stone, plaster, zinc cladding). The 3 storey dwelling occupies the site's southeastern corner, features a recessed ground floor entrance area, recessed first and second floor balconies with glass balustrades, and several window and door opens similarly in a variety of styles and proportions.

Layout

- 8.3.6. With regard to layout, at ground floor level, the dwellings' buildings footprints extend to the respective road edges with small patio areas to the rear (north) of the site. There are no on-site car parking spaces proposed. Access from the rear of the dwellings (via the patio areas) to Cliff Road is indicated via a laneway extending within the northern boundary of the site. The proposed development comprises near-complete site coverage.

Height and Massing

- 8.3.7. With regard to building height, the proposal maintains (on Rocky Road) or exceeds (on Cliff Road) the heights of the existing adjacent two storey structures. The proposed roof profile features a degree of stepping down along Rocky Road (2 storey dwellings) before increasing in height at the junction with Cliff Road (3 storey dwelling) to match that of the higher two storey dwelling. Due to the scheme's near-complete site coverage, its design as a terrace row, with building heights rising from 2 to 3 storeys, the massing of the proposed development is notable within the relative confines of the corner site.

Appraisal

- 8.3.8. In the CDP, the site is located within a 'Most Sensitive Area' landscape designation associated with its coastline location. Applicable CDP policy for the appeal (CDP Section 4.1(a), Appendix 8, Volume 3) requires that new development should not impinge in any significant way upon the landscape's character, integrity or uniformity when viewed from the surroundings, particularly from scenic routes.

- 8.3.9. I have reviewed the application plans and particulars, in particular the CGI and photomontage images of the proposal (Dwg No.s H-08 and H-09 submitted at FI response stage). Dwg No. H-08 indicates six views of the proposal from close proximity, and Dwg NO. H-09 indicates two views of the proposal travelling along Cliff Road (northwest) and Main Street (southeast), a scenic route along the coastline in the village.
- 8.3.10. While I note the case put forward by the applicant in the appeal grounds relating to the architectural design of the scheme being contemporary but context responsive, ensuring a cohesive, well-articulated development that responds positively to the sloping topography and coastal setting, I do not concur.
- 8.3.11. I consider the architectural language employed in the scheme to be inconsistent with and inappropriate for the rural village context. There is a range of projecting and recessed features on all elevations; entrance doors at ground floor, balconies at first and second floor levels, portions of wall plates (angled projection on north elevation). The elevations do not feature flush or solid wall plates, as is characteristic of the historic village streetscape.
- 8.3.12. There are a relatively high number, range and mix of windows and balcony door opes in the south and east elevations, with proportions that vary across floor levels and between dwellings which I consider to be overly fussy and cause a jarring effect in the design. The nature and extent of glazing is dominant; creating void-to-solid proportions which are not balanced. Similarly, this is a design approach that is not evident in the village streetscapes. Regarding the proposed external materials, I agree with the applicant that stone, render and slate are appropriate. I would question the appropriateness of the use of zinc cladding as it does not feature in the village streetscapes, and its use as edging in the design of the elevations results in its appearance not being subtle but instead emphasises a change in materials.
- 8.3.13. While I acknowledge the applicant's case for a contemporary design approach, for the reasons outlined above, the design of the scheme is too dissimilar to that of the prevailing pattern of development in the area, which is characterised by simple, streamlined, vernacular building forms, and exerts a jarring effect on the existing buildings in close proximity to the site on Rocky Road and Cliff Road.

- 8.3.14. Further, I consider the proposed height and massing of the scheme to be excessive for the rural village context. This relates primarily to the height of the three-storey corner building and the massing of the full terrace row along the southern elevation. While I note the applicant's position that the proposed height is modest and the appearance of bulk avoided, I find the proposal does not achieve the undulating rhythm of the existing roofscapes on Rocky Road and Cliff Road, that the roof profile is marginally stepped on Rocky Road before rising again to dominate the corner junction, and that the massing is not sufficiently broken up to achieve the avoidance of bulk as claimed in the appeal grounds.
- 8.3.15. I consider that the inappropriate design approach, and the excessive height, scale and massing of the proposed development are particularly evident in Views 2, 3, 4 of Dwg No. H-08. Apparent from View 1: Proposed and, to a marginally lesser extent, in View 2: Proposed of Dwg No. H-09 is the manner in which the proposal is an excessively dominant feature in the coastline landscape, exerting an adverse visual impact particularly travelling northwards along the scenic route into the rural village.

Conclusion

- 8.3.16. In conclusion, due to the design and layout of the proposed development and the prominent nature of the appeal site, I consider that the proposal would impinge on and detract from the coastline setting, a 'Most Sensitive Area' landscape designation, and would be injurious to the character and visual amenity of Ardmore village. The proposal would therefore be contrary to applicable CDP policy in Section 4.1(a) (Appendix 8, Volume 3) and to the Rural Village zoning objective for the site which seeks to '*Protect and promote the character of the Rural Village...*'.

8.4. Architectural Heritage

- 8.4.1. Appendix 10 (Volume 3) of the CDP outlines the specific special character features of the Ardmore ACA, and the required development management standards. In respect of character, reference is made to the village's historic core, coastal setting, modest single and two storeys rendered terraced houses, undulating roof lines and modest vernacular detailing. In respect of development management, reference is made to historic walls of rendered finish, stepped roofscapes of pitched slate roofs, respecting the predominant height of existing buildings, and that any proposals

should harmonise with the existing streetscape, with specific mention made to Rocky Road and Cliff Road.

- 8.4.2. The planning authority's refusal reason refers to CDP Objective BH 05. The Conservation Officer's report cites several other heritage related CDP objectives. In similarity with the latter, I consider there are several CDP objectives which are of relevance to the proposed development and the assessment of this appeal. As relevant, I consider each in the following assessment.

Compliance with Local Policy

- 8.4.3. In addition to the specific details relating to Ardmore ACA in CDP Appendix 10 (Volume 3), as outlined above, I identify CDP Objectives BH 05 (certain sub-items), BH 11, BH 12, and BH 13, and policy stated in 11.6 and Section 10 (Volume 2) as applicable to the proposal. For the Commission's clarity, there is a degree of overlap between the objectives and policies.
- 8.4.4. Relevant sub-items from Objective BH 05 seek to protect the unique characteristics and distinctive features within the ACA from inappropriate development, which would detract from the special character of the ACA, and to prohibit the demolition of historic structures that positively contributes to the distinctive character of the ACA.
- 8.4.5. For Ardmore ACA, the distinctive characteristics and features include the village's historic core and coastal setting. As outlined in the previous subsection relating to design and layout, the proposed development is considered to be an inappropriate architectural design response for the sensitive location and excessive in height, scale and massing.
- 8.4.6. For the same reasons, I consider that the proposed development detracts from the special character of the ACA as it dominates the site, injures the village's historic core and coastal setting, is a visually overbearing feature in the Rocky Road and Cliff Road streetscapes, and is not consistent with the prevailing pattern of development in the ACA which is characterised by modest single and two storeys rendered vernacular structures with undulating roof lines.
- 8.4.7. The applicable provisions of Objectives BH 11 and BH 12 are similar as these relate to protecting the special character of the ACA from any works which would, respectively, detract visually or physically from, or result in any loss or damage to

same. Objective BH 13 encourages the sensitive redevelopment of vacant or derelict sites within the ACA with schemes that respect urban plots, roof lines vistas and streetscapes. Policy in Section 11.6 requires new development in a historic core to blend in harmoniously, sited and designed sympathetically so as not to detract from the setting, while Section 10 (Volume 2) stipulates standards for demolitions, replacement dwellings, and new buildings; of note includes that the latter should contribute to the visual enhancement of the area while respecting the physical character of the ACA. As discussed previously, in my opinion, the proposed development fails to protect the special character of the ACA, would visually and physically detract from the ACA, does not constitute a sensitive redevelopment of the site, would not blend harmoniously into the setting of the ACA, nor contribute to the visual enhancement of the ACA.

- 8.4.8. In the interest of clarity for the Commission, the veracity of the applicant's AHIA features in the Conservation Officer's report. The AHIA was requested to be completed in accordance with Appendix B of the Architectural Heritage Guidelines (required contents cited in section 5.0 of this report above). I have reviewed the AHIA and would concur with the Conservation Officer. In particular, I find that the that the AHIA lacks any meaningful analysis of the buildings on site to be demolished, which I consider have architectural heritage value. I consider that the AHIA lacks sufficient information to allow an informed decision to be made on the potential impact on the ACA of their demolition and consequently their replacement.

Compliance with National Policy

- 8.4.9. In respect of national policy, I identify Paragraphs 3.10.1 and 3.10.2 of the Architectural Heritage Guidelines as applicable to the appeal, which relate to proposals for new development and demolitions within an ACA respectively (cited in section 5.0 of this report above).
- 8.4.10. For new development in an ACA, I identify three points as being applicable to the proposal and its assessment in this appeal. Firstly, the visual impact of a proposal on its setting is required to be minimised. As discussed above, conversely, I find the visual impact of the proposal on the ACA to be notable and negative. The guidelines inform that the greater the degree of uniformity in the setting, the greater the presumption in favour of a harmonious design. I consider that the existing

streetscapes are uniform in their built environments (scale, heights, elevational treatments, doors and windows openings, external finishes), featuring several simple, restrained, modest vernacular buildings. Accordingly, an appropriate design response for the site would be a consistent and complementary scheme, and not overly dominant or jarring in the ACA, as I consider the proposal to be. Lastly, the guidelines direct that the scale of new structures should be appropriate to the general scale of the area and not its biggest buildings. In the appeal grounds, the applicant relies on the presence of a three-storey dwelling at the western end of Rocky Road and cites other recent developments in the village as examples of buildings which the proposal emulates. I do not concur with the applicant, instead finding (as per the guidelines) that the appropriate height, scale and massing for the scheme is that of the general area (single and two storeys, with modest site coverages and massing).

- 8.4.11. For demolitions in an ACA, I also identify three points of relevance to the proposal and its assessment. The guidelines state the onus is on the applicant to make the case for demolition. As discussed previously, I consider there to be architectural heritage value in the single storey vernacular dwelling and the stonewalls of the old coast guard boat house which houses the toilet block. The applicant describes the structures on site as derelict and deteriorated but fails to substantiate the claims with any evidence of same and, as noted in the Conservation Officer report, the AHIA is lacking in any detailed analysis of the existing structures and the impact of their demolition on the ACA. In my opinion, the applicant has failed to justify the appropriateness and necessity of their demolition (there may be a case for the partial retention of the buildings or reuse of materials in a redevelopment scheme). This lack of information prevents a fully informed consideration of the effect of their demolition on the character of the ACA. Lastly, the guidelines direct that the replacement of an undistinguished building in an ACA (such as the storage unit/ old fire station) should not adversely affect the character of the ACA. For the reasons outlined previously, in my opinion, the proposed development fails to achieve this requirement.

Conclusion

- 8.4.12. In conclusion, I concur with the positions of the planning authority, Conservation Officer, and third-party observer, finding that the proposed development, by reason

of its overall design, height, scale, and massing, would adversely affect the integrity and detract from the special character of the Ardmore Architectural Conservation Area. The proposed development is contrary to CDP Objectives BH 05, BH 11, BH 12, BH 13, and CDP policy in Section 11.6, Section 10 (Volume 2), and Appendix 10 (Volume 3). Further, I consider the proposed development to be contrary to the applicable provisions in Paragraphs 3.10.1 and 3.10.2 of the Architectural Heritage Guidelines.

8.5. Other Matters

- 8.5.1. In respect to other matters in the appeal case, I note that references to archaeological heritage feature in the case documentation. The site does not include any recorded archaeological monuments; the most proximate monument is St. Declan's Holy Stone/ Ritual Site (RPS Ref. WA040-010) located c.61m to the southeast. Were the Commission considering granting permission, a condition relating to archaeological heritage would be recommended.
- 8.5.2. In respect of environmental assessments, I note that the site displays no ecological sensitivities. The site is opposite the coastline (separated by the public road, footpath, retaining wall), the closest watercourse is the Duffcarrick_10 (EPA reference) located c.210m to the northwest of the site (partially culverted along its route/ discharge point). The scheme proposes to connect into the public wastewater and surface water drainage systems. As such, there are no direct meaningful hydrological connections between the proposed development and surface water and groundwater bodies or nature designations. Accordingly, no issues arise in respect of appropriate assessment (AA) or water status impact assessment (WSIA) and the requirements for same have been reasonably screened out. I note the planning authority also screened out the need for same.
- 8.5.3. I have reviewed the Uisce Eireann capacity registers and, correct as of the date of this report, capacity is available in both the water supply and wastewater networks for Ardmore. There is no evidence of flood risk to the proposal, and the site is not located in either Flood Zone A or Zone B as per the development plan maps.

9.0 Appropriate Assessment

9.1. Stage 1 – Screening Determination for Appropriate Assessment

9.1.1. In accordance with section 177U(4) of the Planning and Development Act 2000, as amended (2000 Act), and on the basis of objective information, I conclude that the proposed development would not have a likely significant effect on any European site either alone or in combination with other plans or projects. It is therefore determined that Appropriate Assessment (Stage 2) under section 177V of the 2000 Act is not required.

9.1.2. This conclusion is based on:

- Nature, scale and location of the proposed development.
- Objective information presented in the case file and from verified sources.
- Qualifying interests and conservation objectives of the European sites.
- Absence of any meaningful pathways to any European site.
- Distances from European sites.
- Standard pollution controls and project design features that would be employed regardless of proximity to a European site and the effectiveness of same.

9.1.3. No measures intended to avoid or reduce harmful effects on European sites were taken into account in reaching this conclusion.

10.0 Water Status Impact Assessment

10.1. Screening Determination for Water Impact Status Assessment

10.1.1. I have assessed the proposed development and have considered the objectives as set out in Article 4 of the Water Framework Directive (WFD) which seek to protect and, where necessary, restore surface water and ground waterbodies in order to reach good status (meaning both good chemical and good ecological status), and to prevent deterioration.

10.1.2. I conclude that the proposed development will not result in a risk of deterioration on any waterbody (rivers, lakes, groundwaters, transitional and coastal) either qualitatively or quantitatively, or on a temporary or permanent basis, or otherwise jeopardise any waterbody in reaching its WFD objectives and consequently can be excluded from further assessment.

10.1.3. This conclusion is based on:

- Nature, scale and location of the proposed development.
- Objective information presented in the case file and from verified sources.
- Nature of the closest surface watercourse and proximity to other surface watercourses.
- Lack of any meaningful hydrological connections to any waterbody.
- Use of best practice construction practices during construction phase.

11.0 Recommendation

Following from the above assessment, I recommend that permission be REFUSED for the proposed development for the reason and considerations set out below.

12.0 Reason and Considerations

1. Having regard to the designation of the site as a 'Most Sensitive Area' landscape type, to the location of the site at a visually prominent junction along a scenic route into and through Ardmore village, to the inclusion of the site within the Ardmore Architectural Conservation Area, and to the prevailing pattern of development in the vicinity of the site, it is considered that the proposed development, by reason of its overall design, height, scale, and massing, would be an inappropriate form of development in a rural village context, would seriously injure the rural village character and visual amenities of Ardmore, and would adversely affect the integrity and detract from the special character of the Ardmore Architectural Conservation Area. As such, the proposed development would be contrary to the applicable 'Rural Village' zoning objective of the Waterford City and County Development Plan 2022-2028, which seeks to '*Protect and promote the character of the Rural Village and promote a vibrant community appropriate to available physical and community infrastructure*', to policy in Section 4.1(a) (Appendix 8, Volume 3), to Objectives BH 05, BH 11, BH 12, and BH 13, to policy in Section 11.6, Section 10 (Volume 2), and Appendix 10 (Volume 3). The proposed development would also be contrary to policy in Paragraphs 3.10.1 and 3.10.2

of the Architectural Heritage Protection Guidelines for Planning Authorities, 2011. The proposed development would, therefore, be 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 me, directly or indirectly, following my professional assessment and recommendation set out in my report, in an improper or inappropriate way.

Phillippa Joyce

Senior Planning Inspector

11th August 2026

Appendix 1: Environmental Impact Assessment – Pre-Screening

1. Does the proposed development come within the definition of a 'project' for the purposes of EIA? (that is involving construction works, demolition, or interventions in the natural surroundings)		Yes	✓
		No	
2. Is the proposed development of a CLASS specified in Part 1 or Part 2, Schedule 5, Planning and Development Regulations 2001 (as amended)?			
Yes	✓	Class 10(b) Infrastructure Projects	Proceed to Q3
No			
3. Does the proposed development equal or exceed any relevant THRESHOLD set out in the relevant Class?			
Yes			
No	✓	Class 10(b)(i) and (iv)	Proceed to Q4
4. Is the proposed development below the relevant threshold for the Class of development [sub-threshold development]?			
Yes	✓	Relevant thresholds arising from Classes: - Class 10(b)(i): more than 500 dwelling units. - Class 10(b)(iv): urban development in an area greater than 10ha.	Preliminary Examination required
5. Has Schedule 7A information been submitted?			
No	✓	Pre-screening determination conclusion remains as above (Q1 to Q4)	
Yes			

Inspector: _____

Date: _____

Appendix 2: Environmental Impact Assessment – Preliminary Examination

The Board carried out a preliminary examination [ref. Art. 109(2)(a), Planning and Development regulations 2001, as amended] of at least the nature, size or location of the proposed development, having regard to the criteria set out in Schedule 7 of the Regulations. This preliminary examination should be read with, and in the light of, the rest of the Inspector's Report attached herewith.

Characteristics of proposed development

(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).

Project comprises the demolition of three structures and their replacement with three dwelling units on an infill brownfield site within the historic core of Ardmore village. The project includes connections to the public networks for water supply, wastewater and surface water drainage.

Project differs (but not significantly such that would result in the requirement for an EIA) in terms of character (modern architectural approach) and of scale (2-3 storeys) from the surrounding area (i.e., majority of buildings are 1-2 storeys vernacular buildings).

Physical changes would be caused to the appearance of the site during the construction and operation (occupation) works. No significant use of natural resources is anticipated. No capacity restrictions are identified for water services infrastructure.

Construction phase activities would result in the use of potentially harmful materials, and cause noise and dust emissions. These would likely be typical of similar construction sites. Conventional waste produced from construction and operational activities would be managed.

Project would not cause likely significant effects on human health (such that would result in the requirement for an EIA) through water contamination, air pollution, the design of the scheme, or scale of residential activity.

Location of development

(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

Project is not located in, on, or adjoining any European site, any designated or proposed Natural Heritage Area, or any other listed area of ecological interest or protection. Site has no evidence of protected habitats, plants, or fauna species.

Due to the scale and nature of the project, the proposed wastewater and surface water drainage connections to the public networks, and the separation distances to open watercourses, there are no meaningful direct hydrological connections between the site, any surface, groundwater or

environment e.g. wetland, coastal zones, nature reserves, European sites, densely populated areas, landscapes, sites of historic, cultural or archaeological significance).	coastal body, and/ or any protected nature designation. The site is not located within a flood zone. The site does not contain any recorded archaeological monuments or protected structures. The site is located within the architectural conservation area (ACA) of Ardmore, and within a 'Most Sensitive' scenic classification for landscape assessment purposes. Notwithstanding the findings of negative impacts caused to the character of the ACA, and on the visual amenities of the area, it is considered that the likelihood of significant effects, such that would result in the requirement for an EIA for the project, can be reasonably excluded.	
Types and characteristics of potential impacts (Likely significant effects on environmental parameters, magnitude and spatial extent, nature of impact, transboundary, intensity and complexity, duration, cumulative effects and opportunities for mitigation).	Amelioration of environmental impacts have been incorporated into the project's design. Mitigation measures would include those required by conditions attached to a grant of permission in relation to construction and operation phases. There are no likely significant effects identified or anticipated in terms of cumulative and/ or transboundary effects.	
Conclusion		
Likelihood of Significant Effects	Conclusion in respect of EIA	Yes or No
There is no real likelihood of significant effects on the environment.	EIA is not required.	Yes
There is significant and realistic doubt regarding the likelihood of significant effects on the environment.	Schedule 7A Information required to enable a Screening Determination to be carried out.	No
There is a real likelihood of significant effects on the environment.	EIAR required.	No

Inspector: _____ Date: _____