



## Inspector's Report

**PL-500611-WD-26**

<b>Development</b>	Remove existing thatch roof and replace with clay tile roof.
<b>Location</b>	4 St James Wood , Stradbally , Co. Waterford
<b>Planning Authority</b>	Waterford City and County Council
<b>Planning Authority Reg. Ref.</b>	2560775
<b>Applicant(s)</b>	Jacqueline & Gary Shepherd
<b>Type of Application</b>	Permission
<b>Planning Authority Decision</b>	Refuse Permission
<b>Type of Appeal</b>	First Party Normal Planning Appeal
<b>Appellant(s)</b>	Jacqueline & Gary Shepherd
<b>Observer(s)</b>	None
<b>Date of Site Inspection</b>	7 <sup>th</sup> April 2026
<b>Inspector</b>	Suzanne Kehely

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## 1.0 Site Location and Description

- 1.1. The site relates to one of 14 detached houses in a U-shaped style cul -de sac development to the west of Stradbally village – a picturesque village with its character being dominated by a village green surrounded by traditional terraced buildings in addition to distinctive thatched roof houses of architectural heritage value.
- 1.2. The subject dwelling is part of a development which commenced construction about 20 years ago. The houses are fairly unified in that that have similar form, facades and most notably all have thatched roofs. The houses are large and roof profiles vary to the rear with the some having extended slate clad asymmetrical slopes. The principal façade elevations feature simple symmetry, rendered finish and natural materials including timber doors and windows and varying use of clay and slate in the porch roofs.

## 2.0 Proposed Development

- 2.1. Permission is sought for the removal of the thatch roof and replacement with a clay tile. The supporting documents include:
  - Product specifications of the proposed tile which states its pitch range, 35-90 in addition to a full range of specifications and dimensions. It is a Redland produced tile Rosemary Clay Classic.
  - A letter from Sean Lyons BSC. Arch states that the need is based on:
    - No Irish insurance company will provide insurance for a house with a thatch roof.
    - A German insurance company quote is described as an unsustainable amount at €4000 and rising whereas a non-thatch roof would be in the order of €500-600.
    - There are few skilled thatchers to maintain the roof and there is also a decline in the availability of straw due to farming trends and practices
    - The thatch roof has a life of 20-50 years whereas a clay tile roof has a life of 50-100 years

- Resale of property is restricted due to mortgage restriction on thatched roof properties and the market being effectively confined to cash buyers.
- As the roof is now 20 years and in need of maintenance and repair, it is an opportune time to change the roof.
- The house is not within the Stradbally Conservation Area, and the house is not a Protected Structure accordingly there are no grants available.
- The drawings illustrate the existing and proposed roof materials and photographs are also included illustrating the proposed finish on the roof over the curved hooded dormers. The ridge detail in the drawing 1/20 scale shows how clay tiles in place of the bulkier thatch will reduce the profile and notably the ridge height will be reduced from 8.2m to 7.77m.
- The dormer of the roof is to the rear has a 23-degree pitch.

### **3.0 Planning Authority Decision**

#### **3.1. Decision**

- 3.1.1. By Order dated 17<sup>th</sup> December 2025 the Planning Authority issued notification of its decision to refuse permission for the following reason:

Having regard to the character and location of the subject property which forms part of a development of similar style thatched roof dwellings, the proposal to remove the existing thatch roof would adversely impact the special character and setting of the overall estate and establish a most undesirable precedent for similar piecemeal development, adversely impacting the visual amenity of the area and run counter to Policy Objective BH07 of the Waterford City and County Council Development Plan 2022-2028 which seeks to promote the character and unique identity of rural villages. The proposed development would therefore be contrary to the proper planning and sustainable development of the area

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

- 3.2.1. Planning Reports

The planning report notes the reasons for the proposed roof materials in the context of the observations and planning history of the development and overall impact on visual amenity. It is stated that: 'The removal of the thatch for one property would undoubtedly have adverse impacts on the special character and setting of the estate and would establish a most undesirable precedent for further such piecemeal development. While I would not be opposed to the notion of a clay roof as proposed, it should, in my opinion, be on the basis of a collective proposal for all properties in the estate.'

### 3.2.2. Other Technical Reports

None

### 3.3. Prescribed Bodies

No responses

### 3.4. Third Party Observations

Two letters of objection

- Residents in the development object on the basis that it is one of 14 houses all of which are thatched and attractive in their uniformity. This uniformity should be maintained so as to enhance the overall appearance of the development in accordance with the original design (00/68)
- The proposal is described as architectural vandalism on a neo-Cotswolds style that contributes to amenities of Stradbally - an award-winning tidy town
- Permission would set undesirable precedent resulting in a patchwork approach to roof types and, colours and finishes and destroy the overall look of a special and unique development
- However, roof thatched roof property owners have invested in maintaining such and efforts should not be undermined. While it is acknowledged that there are difficulties with insurance and grants, The Thatch Owners Groups continues to lobby and requests the council to support in lobbying for such.

## 4.0 Planning History

- 4.1. PA ref 03954 refers to permission 11/9/2003 for the development of 14 houses with variations from the original permission (00/68) at St James Wood.

## 5.0 Policy Context

### 5.1. Waterford City and County Development Plan 2022-2028

#### Stradbally

The site is part of the rural village of Stradbally where it is an objective to protect and promote the character of the Rural Village and promote a vibrant community appropriate to available physical and community infrastructure.

#### Built Heritage

- Chapter 11 sets out policy and objective for Built Heritage. There are 20 Architectural Conservation Area and one of these include the village core of Stradbally. Volume 4 (Maps) of the CDP delineates the ACA. The site is outside this area.
- Policy Objective BH07 Promoting our Architectural Heritage: It is the policy of the Council to identify and implement measures for promoting the character of eh historic cores of the city, towns and villages their unique identity and their architectural, archaeological, historical and cultural, social interest and diversity.

#### House extension

Section 4.9 of the Appendices in Volume 2 - Development Management Standards

- The design and layout of extensions to houses should have regard to the amenities of adjoining properties particularly as regards sunlight, daylight and privacy. The character, scale and form of the existing building and site should be respected.

#### Archaeology

- Zones of Notification - Sites and Monuments Record (SMR) including Record of Monuments and Places (RMP):The site is within the Zone of Notification for RMP R131537 (WCCC dataset)

## 5.2. **Natural Heritage Designations**

The closest European Site is Mid-Waterford Coast SPA (004193) at c.640m to the south)

Stradbally Woods NHA (001707 is c.370m to the south.

## 6.0 **EIA Screening**

6.1. The proposed development consisting of alterations of roof materials to a domestic property is not of a class of development to which the provisions for Environmental Impact Assessment apply. See Preliminary Assessment in Form 1 in Appendices.

## 7.0 **The Appeal**

### 7.1. **Grounds of Appeal**

The architect for the applicant has submitted detailed grounds of appeal. This is supported by a statement from the applicants and also a letter of support from a Local TD. The main points can be summarised as

- Prohibitive Insurance costs - €4000 as compared to €500-600 due to thatched roof.
- Concerns about maintenance due to scarce skilled roofers and scarcity of suitable straw and decline in reeds
- Benefits of a clay or slate roof in terms of durability up to 100 years as compared to a m 20-35 range for thatch.
- Above factors restrict sale potential with mortgage restrictions on thatch
- The house is outside the Architectural Conservation Area
- The retention of thatched roofs is not critical to the success of the scheme
- The wider area is characterised by a mix of roofing materials such as slate in the village core and concrete tiles in newer developments.
- The use of a clay tile is good substitute as it has a rustic nature and ties in with the porch detail and harmonises with the chimney and chimney pots which features brick and terracotta.

- The planning report and decision is refuted:
  - With respect to the stated special character of the estate, it is pointed out that there is already a mix of roofing - nos.9-14 include roof slate to the rear and are visually prominent from the adjacent public road
  - With respect to setting, the estate is off the main road and not part of the village spine being 200 from the centre and on a cul-de-sac route to local farms.
  - In view of the forgoing, it is not in conflict with BH07 s
  - In respect to material nature of change and conflict with existing character and the need for substantiated evidence to justify the replacement, it is stated that the pre-planning feedback was accepted in good faith by the applicants and on the understanding that in a case clearly setting out reasons (as stated in the pre-app meeting) that positive consideration would be given.
- The proposal is a simple sensitive change of roof finish in a discrete village edge location outside the ACA and in this way cannot be seen as being contrary to BH07.

## 7.2. Planning Authority Response

- The planning authority is satisfied that the application was fully and properly assess and it is considered the appeal raises no new information.

## 7.3. Observations

None

## 8.0 Assessment

### 8.1. Issues

- 8.1.1. This case relates solely to replacement of a modern traditionally style thatched roof with a clay roof-tile finish. Having examined the application details and all other documentation on file, the reports of the planning authority, and having inspected the

site, and having regard to relevant policy, I consider that the substantive issue in this appeal relates to visual amenity and orderly development. The built heritage policy context which informs the reason for refusal is also an issue and relates to the principle of development.

## **8.2. Built Heritage Policy**

8.2.1. The development plan policy basis for refusal is stated to be BH07 which I note is contained in section 11.4 'Retaining Character/Uniqueness' of Chapter 11 of the Development Plan. This aim of this objective is 'Promoting our Architectural Heritage' and it states: 'It is the policy of the Council to identify and implement measures for promoting the character of the historic cores of the city, towns and villages their unique identity and their architectural, archaeological, historical and cultural, social interest and diversity.' In this case the subject structure is of modern construction and is not a Protected Structure. It is, along with the entire estate of 14 houses, outside the Architectural Conservation Area for Stradbally Village as delineated in Volume 4 (Maps) of the Development Plan. There are very restricted views from the village core or public realm of the subject site or estate of which it forms a part. Accordingly, I consider it unreasonable to apply criteria intended for historic properties of heritage value to modern dwellings outside the ACA and village core.

## **8.3. Visual Impact and orderly development**

- 8.3.1. The basis for the objection by the planning authority and 2 of the residents in the same development, is primarily that the proposal is seeking to considerably alter the roof of only one dwelling in a fairly ordered estate of 14 houses, all of which feature thatched roofs.
- 8.3.2. As this is not an historic property, I consider the principle of replacing the thatch finish with a more durable but high-quality material is reasonable subject to not being unduly incongruous.
- 8.3.3. The alteration relates only to materials with some associated profiling change due to the less bulky tile. I accept that the use of a warm orange hued clay tile will

potentially stand out primarily in colour from the more mellow, dark and greying thatch. There will also be some alteration to the roof profile, but it will be smaller due to the slimmer profiling in the overall roof mass and height and therefore will not contribute to any obtrusiveness by reason of bulk.

- 8.3.4. With respect to the tile type, the applicant is I note proposing a high quality natural clay material that is also traditional and frequently used as a replacement for similar styled and pitched roofs with curved features and what I would describe as an organic profile rather than the more rigidly angular profile associated with a slate tiled roof as is much in evidence in the village. The use of a curved clay tile will therefore retain the rustic character of the roof. It is not entirely incongruous as I note that the porch is clad with the same clay tiles to the front and rear porches. This feature of mixed materials, I note is used intermittently in the estate. I note that slate is used in other houses as a detail and also as part of the rear roof slope in a row of houses on the opposite side of the green. Accordingly, I would not describe the curved row of house to be highly ordered in design. As the small estate matures and roofs are renewed given the life span of thatch ranging from 20-35 years and likely consequent colour variance, I consider the house spacing and other design variances, together with mature planting, can accommodate a degree of variance and bespoke design in these detached houses. I have considered the use of slate in terms of its harmonious colour and use in other roof sections in the estate, but this is an entirely different material and profile with different structural and weathering implications in terms of weight bearing, roof pitch and profiling. I do not think it appropriate or reasonable to revise the design to include slate by condition in the absence of consultation.
- 8.3.5. On balance, I consider the proposed replacement clay roof tile finish for the nature of the roof design will, in overall terms, retain a rustic and organic character and will not be unduly incongruous with the adjacent maturing development, subject to matching with the muted tones of the porch tiles. Agreement of shade of tile can be addressed by condition. Accordingly, I do not consider the proposed development would unduly detract from the visual amenities or orderly development of the area. Accordingly, I do not consider there is a reasonable basis to refuse permission.

## 9.0 AA Screening

9.1. I have considered the proposed development in light of the requirements S177U of the Planning and Development Act 2000 as amended. The subject site is not located within or adjacent to any European Site. The closest European Site is Mid-Waterford Coast SPA (004193) at 640m to the south. The proposed development relates to alterations to an existing structure and is located within a residential housing area. Having considered the nature, scale and location of the proposed development, I am satisfied that it can be eliminated from further assessment because it could not have any appreciable effect on a European Site. The reason for this conclusion is as follows:

- the nature and scale of the development proposed.
- its location in a serviced urban area.
- its distance from European Sites and urban nature of intervening habitats and the absence of ecological pathways to any European Site.

I consider that the proposed development would not be likely to have a significant effect individually, or in-combination with other plans and projects, on a European Site and appropriate assessment is therefore not required.

## 10.0 Water Framework Directive

10.1. An assessment of the proposed development has been undertaken with regard to the objectives set out in Article 4 of the EU Water Framework Directive. Having considered the nature, scale, and location of the proposed development, it is concluded that the proposal will not result in any risk of deterioration in the status of any water body, including surface waters (rivers and lakes), groundwater, transitional waters, or coastal waters. This applies to both qualitative and quantitative status, and in respect of temporary and permanent effects.

10.2. In addition, the proposed development will not adversely affect the achievement of established environmental objectives, including the protection, maintenance, and improvement of water body status, as required under the Directive. Accordingly, the proposed development is considered to be compliant with the requirements of Article 4.

## 11.0 Recommendation

11.1. I recommend that permission be granted for the proposed development based on the following reasons and considerations.

## 12.0 Reasons and Considerations

Having regard to the RV village zoning objective, to protect and promote the character of the rural Village, the pattern of development in the area and the nature of the proposed development, it is considered that, subject to compliance with the conditions set out below, the proposed development to replace a modern thatched roof with a more durable clay tile which would retain the rustic character, would not seriously injure the visual amenities or character of the area or the residential amenities of property in the vicinity, and would, therefore, be in accordance with the proper planning and sustainable development of the area.

## 13.0 Conditions

1. The development shall be carried out and completed in accordance with the plans and particulars lodged with the application, except as may otherwise be required in order to comply with the following conditions. Where such conditions require details to be agreed with the planning authority, the developer shall agree such details in writing with the planning authority prior to commencement of development and the development shall be carried out and completed in accordance with the agreed particulars.

Reason: In the interest of clarity.

2. The roof tiles shall harmonise with those in the porch in the existing dwelling in respect of colour and texture. A sample tile shall be submitted for the prior written agreement of the planning authority.

Reason: In the interest of visual amenity.

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.

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Suzanne Kehely  
Senior Planning Inspector

23<sup>rd</sup> April 2026

### Appendix 1: Form 1 EIA Pre-Screening

<b>Case Reference</b>	
<b>Proposed Development Summary</b>	Change of roof material in demotic dwelling
<b>Development Address</b>	<b>4 St. James Wood, Stradbally Co. Waterford</b>
<b>IN ALL CASES CHECK BOX / OR LEAVE BLANK</b>	
<b>1. Does the proposed development come within the definition of a 'Project' for the purposes of EIA?</b>	<input checked="" type="checkbox"/> Yes, it is a 'Project'. Proceed to Q.2.
	<input type="checkbox"/> No, No further action required.
(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)	
<b>2. Is the proposed development of a CLASS specified in Part 1, Schedule 5 of the Planning and Development Regulations 2001 (as amended)?</b>	
<input type="checkbox"/> Yes, it is a Class specified in Part 1.  <b>EIA is mandatory. No Screening required. EIAR to be requested. Discuss with ADP.</b>	<b>State the Class here</b>
<input checked="" type="checkbox"/> No, it is not a Class specified in Part 1. Proceed to Q3	
<b>3. Is the proposed development of a CLASS specified in Part 2, Schedule 5, Planning and Development Regulations 2001 (as amended) OR a prescribed type of proposed road development under Article 8 of Roads Regulations 1994, AND does it meet/exceed the thresholds?</b>	

<input 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. <b>No Screening required.</b>	
<input type="checkbox"/> Yes, the proposed development is of a Class and meets/exceeds the threshold. <b>EIA is Mandatory. No Screening Required</b>	<b>State the Class and state the relevant threshold</b>
<input type="checkbox"/> Yes, the proposed development is of a Class but is sub-threshold.  <b>Preliminary examination required. (Form 2) OR If Schedule 7A information submitted proceed to Q4. (Form 3 Required)</b>	<b>State the Class and state the relevant threshold</b>
<b>4. Has Schedule 7A information been submitted AND is the development a Class of Development for the purposes of the EIA Directive (as identified in Q3)?</b>	
Yes <input type="checkbox"/>	
No <input checked="" type="checkbox"/>	<b>Pre-screening determination conclusion remains as above (Q1 to Q3)</b>

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

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