



Development	Retention of change of use to hotel accommodation, construction of a cabin and all associated site works
Location	Dublin Airport Manor, Knocksedan, Brackenstown, Swords, Co. Dublin, K67 FR68
Planning Authority	Fingal County Council
Planning Authority Reg. Ref.	F25A/1087E
Applicant(s)	Brimwood Unlimited Company
Type of Application	Retention
Planning Authority Decision	Refuse Retention
Type of Appeal	First Party Normal Planning Appeal
Appellant	Brimwood Unlimited Company
Observer	None
Date of Site Inspection	1 st May 2026
Inspector	Peter Nelson

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Appendix 1: Form 1 EIA Pre-Screening

Appendix 2: WFD

1.0 Site Location and Description

- 1.1. The site is located in the townland of Knocksedan, Swords. It lies on the western side of the R108 and is accessed through a gated entrance from a shared access road. The site, which has a stated area of 0.340ha, includes a two-storey guesthouse, outbuildings, and a chalet to the rear. There is a separate vehicle entrance to the rear and a parking area to the front. Within the site's historic boundary wall, on the northern and eastern boundaries, are large, mature trees that were originally part of Knocksedan House, which is included on Fingal County's register of protected structures. (RPS 369).
- 1.2. To the east of the site are industrial activities with large hardstanding areas. To the south of the access road are warehouse units. To the west of the site, on the opposite side of the R108, is Knockeadan Demise, a residential development.

2.0 Proposed Development

- 2.1. The development consists of the retention planning permission required for:
 - a. the change of use of 2 no. existing single-storey outhouses to hotel accommodation (comprising 4 no. en-suite guest bedrooms) and a utility/plant/store room;
 - b. construction of a single-storey cabin to provide 1 no. en-suite guest bedroom. In total, there are 5 no. additional guest bedrooms;

Planning permission required for:

1. the installation of a new wastewater treatment system to serve the property;
and
2. all associated works, inclusive of drainage, landscaping and boundary treatments necessary to facilitate the development.

3.0 Planning Authority Decision

3.1. Decision

Fingal County Council refused permission for the proposed development and for the development to be retained on the 30th January 2026 for the following three reasons:

1. The proposal, by reason of its detached and ad hoc nature along with intensification proposed, in addition to the nature of the use, would contravene materially Objective EEO58 of the Fingal Development Plan 2023-2029, which supports extensions to existing dwellings for the purpose of Bed and Breakfast or Guest House Accommodation within areas which have zoning objectives GB, provided the size, design, surface water management and foul drainage arrangements for the proposed development does not erode the rural quality and character of the surrounding area and it is considered the proposal would therefore be contrary to the proper planning and sustainable development of the area.
2. The applicant is proposing to connect their proposed foul drainage to a new private WWT system. Having regard to the scale of the existing development and the increased loading the proposal would give rise to a significant pollution risk. The proposed development is therefore considered unacceptable and if permitted would be prejudicial to public health.
3. Insufficient information is submitted to demonstrate appropriate safe connectivity for pedestrians at this location and in absence of such information, the proposed development would lead to a conflict between pedestrian and road user and therefore would be contrary to the proper planning and sustainable development of the area.

3.2. Planning Authority Reports

3.2.1. Planning Reports

The main points of the planner's report dated 20th January 2026 can be summarised as follows:

- The previous refusal (P.A. Ref: F25A/0728E) for a similar development on the site was noted.

- Guest House use is permitted in principle on 'GB' zoned lands where the use is ancillary to the use of the dwelling as a main residence.
- The applicant's planning report states that the residential element remains in the main guest house, which is not part of the application.
- The applicant states that the guest house is being used temporarily to accommodate protected persons.
- The use of the buildings as a guest house remains questionable, as online records would indicate accommodation bookings to be permanently closed.
- The site is in a rural area, and guest house accommodation should be ancillary to the main dwelling.
- The proposal is contrary to the zoning objective for the site and Objective EEO58.
- The units subject to change of use are considered to be piecemeal and visually obtrusive to the adjacent Knockedan House and curtilage, a protected structure.
- Pedestrian connectivity for existing occupants is considered to be substandard, and a proposal is required to provide a connection to the existing footpaths on the eastern side of the R108.
- The sightlines for the entrance are considered acceptable.
- It is recommended that the piers and walls should be reduced to a height of not more than 0.9 m located within the visibility splay.
- The applicant proposes to construct a private wastewater treatment system due to infrastructure constraints at the site.
- Given the scale of the proposed development and the associated pollution risk, this would be unacceptable; therefore, permission should be refused.
- The submitted surface water drainage layout is considered acceptable.
- The application does not overcome the reasons for refusal relating to P.A. Ref. F25A/0728E.

- Issues remaining relate to design/layout, compliance with zoning objectives and development plan policies relating to guest houses, in addition to wastewater disposal.
- The proposed cannot be considered to accord with Objective EEO58 of the Fingal Development Plan 2023-2029.
- It is recommended that permission be refused.

3.2.2. Other Technical Reports

Transportation Report, 12th January 2026, recommends Further Information relating to the provision of pedestrian connectivity to the footpath on the eastern side of the R108, legal consent for works if required, and the height of the entrance wall to ensure adequate sightlines.

Water Services Report, 23rd December 2025, recommends refusal due to unacceptable details regarding the proposed wastewater scheme and recommends that the development connect to the Uisce Eireann network.

Conservation Report, 8th December 2025, has no objection to the change of use of the existing buildings. Comments also refer to drainage, impact of boundary wall and landscaping.

3.3. Prescribed Bodies

None

3.4. Third Party Observations

No third-party observations were received by the Planning Authority during the statutory time period.

4.0 Planning History

P.A. Ref: F25A/0728E

Permission refused on 30 September 2025 for the retention of the change of use of 2 no. existing single-storey outhouses to hotel accommodation (comprising 4 no. en-suite guest bedrooms) and a utility/plant/storeroom.

Permission refused for the construction of a single-storey cabin to provide 1 no. en-suite guest bedroom. In total there are 5 no. additional guest bedrooms; and all associated works, inclusive of drainage, landscaping and boundary treatments necessary to facilitate the development.

Reasons for refusal:

1. The proposed development would endanger public safety by reason of serious traffic hazard as the required sightlines have not been demonstrated for either entrances off the access road or for the existing vehicular entrance onto the R108. The applicant has not demonstrated appropriate safe connectivity for pedestrians at this location and given that the subject structures are located on an existing car park, the development gives rise to ad hoc parking and vehicular movements in close proximity to vulnerable pedestrians and a substandard layout difficult to access for emergency services. It is therefore considered that the proposal would intensify the use of the site and would be considered a traffic hazard and therefore would be contrary to the proper planning and sustainable development of the area.
2. As a consequence of insufficient information submitted on both the existing and proposed wastewater treatment it cannot be concluded that the development, would not cause serious water pollution, and for that reason would be prejudicial to public health. The absence of evidence that the proposal would not result in a significant impact on the conservation objectives of European sites, precludes the planning authority from permitting the proposal. The development would, therefore, be contrary to the proper planning and sustainable development of the area.
3. It is considered that the proposal, by reason of its detached and ad hoc nature along with intensification proposed, in addition with the lack of information submitted, would contravene materially to Objective EE058 of the Fingal Development Plan 2023-2029, which supports extensions to existing dwellings for the purpose of Bed and Breakfast or Guest House Accommodation within

areas which have zoning objectives GB, provided the size, design, surface water management and foul drainage arrangements for the proposed development does not erode the rural quality and character of the surrounding area and it is considered the proposal would therefore be contrary to the proper planning and sustainable development of the area.

P.A. Ref: FS/060/24

Section 5 Referral

The change of use of guesthouse to provide accommodation for persons seeking international protection was considered **development** and **not exempted** development.

APC Ref: PL.06F.102471

Permission granted on 12 September 1997 for a 12 Bedroom Guest House at Old Walled Garden Site adjacent to Knocksedan House, Swords

5.0 Policy Context

5.1. Development Plan

The Fingal Development Plan 2023 – 2029 is the operational plan for the area. It was made on 22nd February 2023 and came into effect on 5th April 2023.

Two variations to the plan were adopted on 30th March 2026.

The subject site is in an area designated with Zoning Objective 'GB' Greenbelt, which seeks to 'Protect and provide for a Greenbelt'.

Vision:

'Create a rural/urban Greenbelt zone that permanently demarcates the boundary (i) between the rural and urban areas, or (ii) between urban and urban areas. The role of the Greenbelt is to check unrestricted sprawl of urban areas, to prevent coalescence of settlements, to prevent countryside encroachment and to protect the setting of towns and/or villages. The Greenbelt is attractive and multifunctional, serves the needs of both the urban and rural communities, and strengthens the links between urban and rural areas in a sustainable manner. The Greenbelt will provide

opportunities for countryside access and for recreation, retain attractive landscapes, improve derelict land within and around towns, secure lands with a nature conservation interest, and retain land in agricultural use. The zoning objective will have the consequence of achieving the regeneration of undeveloped town areas by ensuring that urban development is directed towards these areas.'

Relevant Policies

Objective EEO45 Tourism and Economic Growth

Promote and facilitate tourism as one of the key economic pillars of the County's economy and a major generator of employment and to support the provision of necessary significant increase in facilities such as hotels, aparthotels, tourist hostels, cafes and restaurants, visitor attractions, including those for children.

Objective EEP22 Tourism Infrastructure

Support development of tourism infrastructure, visitor attractions and supporting facilities at appropriate locations in the County in a manner that does not have an adverse impact on the receiving areas and the receiving environment.

Policy SPQHP26 – Emergency Accommodation

Facilitate and support State agencies in the provision of specific emergency or other forms of housing need within Fingal as such demand arises.

Policy SPQHP27 – Accommodation for Refugees and Asylum Seekers

The Council will implement government policy in relation to the provision of accommodation for refugees and asylum seekers within Fingal

Objective EEO58 Bed and Breakfast or Guest House Accommodation

Support proposed extensions to existing dwellings, within areas which have zoning objectives, RU, GB, HA, RV, or RC, which provide for bed and breakfast or guest house accommodation where the size, design, surface water management and foul drainage arrangements for the proposed development does not erode the rural quality and character of the surrounding area.

Policy HCAP12 Interventions to Protected Structures

Ensure that direct or indirect interventions to Protected Structures or adjoining development affecting them are guided by architectural conservation principles so that they are sympathetic, sensitive and appropriate to the special interest, appearance, character, and setting of the Protected Structure and are sensitively scaled and designed.

Objective ZO3 Non-Conforming Uses

Generally, permit reasonable intensification of extensions to and improvement of premises accommodating non-conforming uses, subject to normal planning criteria.

Objective ZO4 Ancillary Uses

Ensure that developments ancillary to the parent use of a site are considered on their merits.

5.2. Natural Heritage Designations

Malahide Estuary Special Area of Conservation is c.4.3 km from the appeal site.

Malahide Estuary Special Protection Area is c.4.3 km from the appeal site.

Malahide Estuary Proposed Natural Heritage Area is c.4.3 km from the appeal site.

6.0 EIA Screening

- 6.1. 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 the report.

7.0 The Appeal

7.1. Grounds of Appeal

The main points of the first party appeal can be summarised as follows:

- The proposed development is representative of a high-quality and appropriate scaled expansion of an existing guest house development in Swords.

- The proposed development does not constitute intensification of the site and involves the primary reuse of existing structures.
- The proposed development does not extend into open countryside or erode the existing rural character of the area.
- The modest expansion aligns with the principal intent of the Greenbelt zoning objective without compromising it.
- The wastewater treatment system has been proposed in accordance with EPA guidance and best practice engineering.
- The proposed development will not contribute to a water pollution risk and will have no impact on public health.
- The proposed development is unlikely to produce substantial extra traffic.
- Adequate sightlines are achieved to ensure traffic and pedestrian safety.
- Further engineering details confirm that safe pedestrian access can be provided on site.
- The proposed development aligns with the proper planning and development of the area.

The appeal also includes alternative proposals for the Commission's consideration.

- A direct connection to the public foul sewer network in lieu of onsite treatment and discharge, including the decommissioning of the existing private wastewater treatment system, provision of an on-site pumping station and rising main.
- A revised proposal for a new signal-controlled Puffin crossing in the R108.

7.2. Planning Authority Response

The main points of the Planning Authority's response to the grounds of appeal can be summarised as follows:

- Following the refusal of the previous application, a further review was conducted.

- The applicant has not addressed the previous reasons for refusals.
- Based on the information provided, it appears that the development is not providing hotel/guesthouse accommodation to visiting members of the public and would therefore not accord with Objective EEO58.
- The development would be contrary to the ‘GB’ Green Belt zoning and would set an undesirable precedent for similar development to occur.

7.3. **Observations**

None

8.0 **Assessment**

8.1. Having examined the application details and all other documentation on file, including all of the submissions received in relation to the appeal, the reports of the local authority, and having inspected the site, and having regard to the relevant local/regional/national policies and guidance, I consider that the substantive issues in this appeal to be considered are as follows:

- Principle of Development
- Visual Amenity
- Wastewater Treatment Plant
- Access

8.2. **Principle of Development**

8.2.1. The site is situated within an area that is zoned GB-Green Belt with the objective ‘to protect and provide for a Greenbelt’.

8.2.2. Guest Houses are permitted in principle in this zoning where the use is ancillary to the use of the dwelling as a main residence. Objective EE058 of the FDP is to support proposed extensions to existing dwellings, within areas which have zoning objectives, RU, GB, HA, RV, or RC, which provide for bed and breakfast or guest house accommodation where the size, design, surface water management and foul drainage arrangements for the proposed development does not erode the rural quality and character of the surrounding area.

- 8.2.3. The Planning Report dated 20th January 2026 states that the use of the building remains unclear, as online accommodation bookings appear permanently closed. It also states that guesthouse accommodation should be ancillary to the main dwelling, and this does not seem to be the case here.
- 8.2.4. The applicant's planning report, included with the application, states that the residential element of the guesthouse remains and is depicted in the submitted drawings.
- 8.2.5. The applicant's report also states that the guesthouse is being used temporarily to accommodate protected persons. The applicant notes that this use is exempted development under Class 14(h) of the Planning and Development Regulations 2001-2025 and states that the property will reopen for public bookings once the exemption ends.
- 8.2.6. I note that a Section 5 referral was submitted to the Planning Authority, asking where the use of this guesthouse to provide accommodation for permission-seeking international protection constitutes exempted development. The PA concluded that the change of use of the guesthouse to provide accommodation for persons seeking international protection was considered development and is not exempted development. During my site inspection, it was apparent that the buildings were not currently being used as a guesthouse.
- 8.2.7. The proposed application is for the change of use of two outbuildings to hotel accommodation and the retention of a single-storey cabin for use as a guest bedroom. I will assess the development to be retained and proposed as described in the public notices. Any potential enforcement issues relating to the property's use are the responsibility of the Planning Authority.
- 8.2.8. I consider the guesthouse as an established use on this site, and the additional rooms in the outhouses and chalet constitute an intensification of that use. I note that Objective EE05 of the FDP supports the extension of existing dwellings for Guest House use. I consider that, in principle, the change of use of the outbuildings for hotel accommodation and the provision of a chalet for hotel use is acceptable, subject to an assessment of the visual amenity, impact on the rural quality of the area and the proposed wastewater treatment plant.

8.3. Visual Amenity

- 8.3.1. The first reason for refusal states that by reason of its detached and ad hoc nature along with intensification proposed, in addition to the nature of the use, would contravene materially Objective EEO58 of the Fingal Development Plan 2023-2029. This objective supports extensions to existing dwellings for the purpose of Bed and Breakfast or Guest House Accommodation within areas which have zoning objectives GB, provided that the size, design, surface water management and foul drainage arrangements for the proposed development does not erode the rural quality and character of the surrounding area.
- 8.3.2. In response to this reason for refusal, the applicant stated that the proposed development does not materially contravene Objective EE058 as it does not erode the rural quality and character of the area but rather represents a continuation of a long-established and previously accepted use at this location. The proposed outbuildings and the chalet to be retained are within the guesthouse's existing site.
- 8.3.3. In the Planner's report, it is stated that concerns still exist regarding the impact of the setting of the Protected Structure and its curtilage. The Planner considers that the outbuildings are haphazard, would detract from the main established building, and are visually obtrusive on the site and to the surrounding area, in particular to the adjacent Knocksedan House and its curtilage.
- 8.3.4. I note the report from the Conservation Officer dated the 8th December 2025 notes that the site once served as the gardens to Knocksedan House and that the historic redbrick wall on the northern, eastern and part of the southern boundary of the site is original to Knocksedan House. It is also noted that the buildings have no architectural quality, and that the development relies on planting to the north, outside the ownership boundary, to mitigate the visual impact on the adjoining protected structure. The Conservation Office has no objection to the change of use of the existing buildings. They state that it is important to retain any mature trees on the eastern side and that intensification of use does not require their removal for sightlines. The Conservation Office recommends that a landscape plan be provided to provide screening along the northern and northwestern boundaries of the site, to protect the setting of the adjoining protected structure.

8.3.5. I consider that, given the immediate nature of this site, where there are industrial uses with hardstand areas directly to the east and the south, the development to be retained does not erode the rural quality and character of the area and is an extension of an established use. I also consider that the development to be retained does not represent encroachment into the countryside. I do, however, consider, as suggested by the Conservation Officer, that providing a landscape plan for the site, including additional screen planting, would improve the setting of the structures and enhance the setting of this development and the adjoining protected structure. If the Commission is minded to grant permission, I recommend that a condition be attached requiring the agreement and implementation of a landscaping scheme.

8.4. Wastewater Treatment

- 8.4.1. The applicant proposes to connect the foul drainage from the existing development and the development to be retained to a new private wastewater system. The second reason for refusal states that, having regard to the scale of the existing development and the increased loading the proposal would give rise to, it would pose a significant pollution risk and be prejudicial to public health.
- 8.4.2. Objective EE058 of the FDP requires that for extensions to guesthouse use in Green Belt zoned lands, the foul drainage (amongst other elements) does not erode the rural quality and character of the surrounding area. Therefore, an assessment of the impact of the proposed wastewater treatment on the surrounding area is necessary to ensure compliance with Objective EE058.
- 8.4.3. The applicant submitted a site suitability Assessment Report carried out by Stingray Environmental Engineering with the application. It is stated that the total population equivalent for the development is 85 PE.
- 8.4.4. There is an existing Kingspan Biodisk RBC WWTS, which is stated to be not fit for purpose. At the existing Percolation Area, effluent ponding occurs at the surface, and the system is not fit for purpose; therefore, it is proposed to be decommissioned.
- 8.4.5. The applicant is proposing to install a PE 100 wastewater treatment plant to accommodate the population equivalent of 85. This will place a daily hydraulic loading of 12.75m³ (85X150l). This triggers the 5m³ per day threshold requiring a

discharge licence under Section 4 of the Local Government (Water Pollution) Act, 1977 as amended. The applicant states that the proposed Kingspan RBC 85-100PE WWTS model is designed in accordance with the EPA 1999 Wastewater Treatment Manual, Treatment Systems for Small Communities, Businesses, Leisure Centres and Hotels.

- 8.4.6. The project, as described, would fall within the grouping of small housing development, hotels and leisure facilities generating between 5 and 20m³ per day. The risk of the impact varies from moderate to high depending on specific criteria. The site is located within an area of high vulnerability, with a high volume and nutrient load, which are triggers for a higher level of assessment (tier 3). This level would require a significant level of investigation and detail in a hydrogeological assessment. This assessment would include details on infiltration capacity, microbiological and chemical input, minimum separation distances, groundwater flow directions inferred from topography and from site monitoring and measurement, subsoil type textures thickness and permeability, aquifer type and hydraulic properties, background GW quality, identification of relevant receptors and associated water quality standards, ZOC of downgradient abstraction points, quantification of interactions between surface and ground waters in addition to conceptual site model detailing cross sections and where appropriate numerical modelling.
- 8.4.7. In the report of the Water Services Department of the P.A. dated the 23rd December 2025, it is stated that the use of the EPA Code of Practice for Domestic Wastewater Treatment Systems (PE not greater than 10)(2021) is neither applicable, appropriate, nor adequate for assessing the technical merits of this proposal. The report states that, given the scale of the proposed development and the associated pollution risk, the proposal is considered large and unjustifiable.
- 8.4.8. In the grounds of appeal, the applicant states that the site is currently connected to a wastewater system located on third-party lands to the northwest and given the difficulty of accessing these lands, an on-site wastewater treatment system is proposed. It is claimed that the submitted reports and associated drawings demonstrate that the wastewater generated by the proposed development can be

managed without negative impacts on the surrounding environment or causing serious water pollution.

- 8.4.9. As stated, the site is located within an area of high vulnerability, a high volume and nutrient load. While I acknowledge the contents of the submitted site characteristic report, the application lacks sufficient detail to adequately assess the proposed WWTP and its impact on public health.
- 8.4.10. The Water Service Department recommends that permission be refused and that the applicant engage with Uisce Éireann to obtain a connection to the UE network. It states that whilst a gravity network is most preferred, a suitable pumping station arrangement may also be considered.
- 8.4.11. I note that the Uisce Eireann Wastewater Treatment Capacity Register of April 2026, Swords WWTP, indicates that spare capacity is available.
- 8.4.12. The ad hoc nature of the site's drainage is recognised by the applicant. Notwithstanding the applicant's assumption that the proposed WWTS will not pose a risk to public health, as part of the appeal submission, the applicant now proposes to provide a direct connection to the public foul sewer network in lieu of on-site treatment and discharge. This will include the decommissioning of the existing WWTS, the provision of an on-site pumping station and rising main to the nearest public manhole within Knocksedan Demesne, and the progression of the connection through the Uisce Eireann processes. It is stated that a Pre-Connection Enquiry has been submitted.
- 8.4.13. Having regard in principle, the connection to the public network is welcomed. However, no confirmation of Feasibility from Uisce Eireann has been submitted. Therefore, there is uncertainty if this connection is achievable. This connection would also require works to be undertaken outside the red line of the site included in the application. I consider that the alternative proposed would differ materially from the proposed development and from the development to be retained as described in the public notices, and therefore, I do not consider it appropriate to have regard to the alternative proposal.
- 8.4.14. Based on the information submitted in connection with the planning application and the appeal, I consider that it has not been demonstrated that effluent from the development proposed to be retained can be satisfactorily treated and disposed of on

site, despite the proposed use of a secondary wastewater treatment system. The development to be retained and the proposed development would be prejudicial to public health and would, therefore, be contrary to Objective EE058.

8.5. Access

- 8.5.1. The third reason for refusal states that insufficient information has been submitted to demonstrate appropriate safe connectivity for pedestrians at this location, and in the absence of such information, the proposed development would lead to a conflict between pedestrians and road users.
- 8.5.2. The report from the Transportation Planning Section dated the 12th January 2026 states that while there is a delineated walkway at grade with the access road providing pedestrian connection from the site to the R108, it is substandard, and it is difficult to cross the R108 at the junction in order to reach the footpath on the eastern side of the R108 and to reach the bus stop in Knocksedan Demesne.
- 8.5.3. A Road Safety Audit (RSA) has been submitted as part of the appeal. The RSA highlights the problem of crossing the R108, as it could lead to slips and falls on the verge and the high kerb on the Knocksedan Demesne side, and to mixing with vehicular traffic, including heavy goods vehicles (HGVs), on the access road. At the time of the site inspection, a number of HGV vehicles were entering the access road in closed succession on their way to the industrial site to the east of the subject site. I consider the existing pedestrian connectivity to be restricted and unsatisfactory.
- 8.5.4. The RSA recommends that a suitable crossing be provided on the R108 for pedestrians from the existing footpath along the eastern verge, along with a dedicated route to the pedestrian part of the main access gates or by a new pedestrian-only access off the R108 into the garden area of the development site.
- 8.5.5. In the grounds of appeal, the applicant states that in response to the Council's concerns regarding pedestrian connectivity and safety, a revised proposal for a new signal-controlled Puffin crossing on the R108, high-friction surfacing on both approaches, removal of the grass verge to provide a safe landing area, and a new dedicated pedestrian entrance directly from the site onto the R108. Minimal details of the proposed dedicated pedestrian crossing have been provided. I note that in

their response to the appeal, the Planning Authority does not make direct reference to this alternative proposal. They do, however, request that the Commission uphold the planning authority's decision to refuse.

- 8.5.6. Given the lack of information supplied with the appeal relating to the provision of a pedestrian crossing on the regional road, I consider that while, welcome in principle, the provision of a pedestrian crossing in the proposed location would be better served by the submission of a new planning application. This, in turn, will allow for third-party participation.
- 8.5.7. Notwithstanding the submission of an alternative for pedestrian connectivity as part of the appeal, I consider that there is insufficient information to demonstrate that safe connectivity is available for additional pedestrians at this location. Given the existing substandard pedestrian facilities on this heavily trafficked laneway, which is used by HGVs, I consider that the increased use of the Guesthouse will lead to increased conflict between pedestrians and road users and therefore endanger pedestrian safety.

9.0 AA Screening

- 9.1. I have considered the retention of change of use to hotel accommodation and the construction of a cabin in light of the requirements of S177U of the Planning and Development Act 2000 as amended.
- 9.2. The subject site is located on the edge of the urban area of Swords, c.4.3 km from the Malahide Estuary Special Area of Conservation and Malahide Estuary Special Protection Area.
- 9.3. Permission is sought to retain the change of use of outbuildings for guest house use, and the retention of the construction of a chalet for guesthouse use, and for permission for a new wastewater treatment plant.
- 9.4. No nature conservation concerns were raised in the planning appeal.
- 9.5. Having considered the nature, scale and location of the project, I am satisfied that it can be eliminated from further assessment because it could not have any effect on a European Site.

9.6. The reason for this conclusion is as follows:

- Nature of works e.g. small scale and nature of the development
- Location-distance from nearest European site and lack of connections

9.7. I conclude, on the basis of objective information, 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.

9.8. Likely significant effects are excluded and therefore Appropriate Assessment (under Section 177V of the Planning and Development Act 2000) is not required.

10.0 Water Framework Directive

10.1.1. The proposed development and development to be retained has been subject to a screening and assessment for Water Framework Directive Assessment (refer to Appendix 2 of this report).

10.1.2. The subject site is located within the rural townland of Knocksedan, Brackenstown, Swords. The River (WARD_040. IE_EA_08W010610) is situated circa 225m to the north. The Swords (IE_EA_G_011) groundwater body underlies the site.

10.1.3. The proposed development includes a new wastewater treatment system for the existing guesthouse with a PE 85.

10.1.4. I have assessed the proposed development which includes the provision of a new wastewater treatment system and have considered the objectives as set out in Article 4 of the Water Framework Directive which seek to protect and, where necessary, restore surface & 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 project, I am uncertain that it can be eliminated from further assessment because it cannot be demonstrated that the site is suitable for the scale of treatment of wastewater. Please refer to section 8.4 of this report.

10.1.5. The reason for this conclusion is as follows:

- The lack of information demonstrating the suitability of the site for the treatment of wastewater that will arise from the proposed development.

10.1.6. Conclusion I conclude that on the basis of a lack of objective information, it is uncertain that the proposed development will not result in a risk of deterioration on any water body (rivers, lakes, groundwaters, transitional and coastal) either qualitatively or quantitatively or on a temporary or permanent basis or otherwise jeopardize any water body in reaching its WFD objectives and consequently cannot be excluded from further assessment.

11.0 Recommendation

11.1. I recommend that permission be refused for the following reasons:

12.0 Reasons and Considerations

1. The Commission is not satisfied, based on the information submitted in connection with the planning application and the appeal, that effluent from the existing development and development proposed to be retained can be satisfactorily treated and disposed of onsite and would not result in a risk of deterioration of any waterbody or be prejudicial to public health. The development proposed to be retained would, therefore, be contrary to Objective EE058 of the Fingal Development Plan 2023-2029 and would, therefore, be contrary to the proper planning and sustainable development of the area.
2. Insufficient information has been provided to demonstrate appropriate safe connectivity for additional pedestrians at this location. In the absence of such information, the proposed development would lead to a conflict between pedestrians and road users, resulting in safety concerns for pedestrians, and 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.

Peter Nelson
Planning Inspector

22 May 2026

Appendix 1: Form 1 EIA Pre-Screening

Case Reference	PL 500798 DF 26
Proposed Development Summary	<p>The development consists of the retention planning permission required for: (a) the change of use of 2 no. existing single-storey outhouses to hotel accommodation (comprising 4 no. en-suite guest bedrooms) and a utility/plant/store room; (b) construction of a single-storey cabin to provide 1 no. en-suite guest bedroom. In total, there are 5 no. additional guest bedrooms;</p> <p>Planning permission required for: (a) the installation of a new wastewater treatment system to serve the property; and (b) all associated works, inclusive of drainage, landscaping and boundary treatments necessary to facilitate the development.</p>
Development Address	Dublin Airport Manor, Knocksedan, Brackenstown, Swords, Co. Dublin.
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?	<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)	
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. Discuss with ADP.	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.	
<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.	

<p>Preliminary examination required. (Form 2)</p> <p>OR</p> <p>If Schedule 7A information submitted proceed to Q4. (Form 3 Required)</p>	
<p>4. Has Schedule 7A information been submitted AND is the development a Class of Development for the purposes of the EIA Directive (as identified in Q3)?</p>	
<p>Yes <input type="checkbox"/></p>	
<p>No <input checked="" type="checkbox"/></p>	<p>Pre-screening determination conclusion remains as above (Q1 to Q3)</p>

Inspector: _____

Date: _____

WFD IMPACT ASSESSMENT SCOPING TABLE

Step 1: Nature of the Project, the Site and Locality

An Coimisiún Pleanála ref. no.	PL-500798-DF-26	Townland, address	Knocksedan, Bracenstown Swords
Description of project		Retention for the change of use of outbuildings to hotel accommodation and for a chalet for hotel accommodation. Permission for installation of a new wastewater treatment system.	
Brief site description, relevant to WFD Screening,		The site is at the edge of the Swords urban area. It is immediately surrounded by industrial uses and a residential protected structure. The site is 225m south of the Ward River and contains an established guesthouse with car parking areas.	
Proposed surface water details		The existing surface water is disposed to a soakpit.	
Proposed water supply source & available capacity		Public	
Proposed wastewater treatment system & available capacity, other issues		An 85PE secondary wastewater treatment plant, designed in accordance with S.R.66-2015 and IS EN12566-3:2005, will be installed on the proposed site. The installation of Kingspan RBC 85-100PE WWTS model is proposed.	
Others?			

Step 2: Identification of relevant water bodies and Step 3: S-P-R connection

Identified water body	Water body name(s) (code)	WFD Status	Risk of not achieving WFD Objective e.g.at risk, review, not at risk	Identified pressures on that water body	Pathway linkage to water feature (e.g. surface run-off, drainage, groundwater) (Consider all phases)	Mitigation Measures proposed	Is mitigation sufficient? Will there be any residual impacts?
Ward River	WARD_040 IE_EA_08W010610	Moderate	At Risk	Hydro morphological. Urban run-off	None Due to the limited nature of the new development and the distance to the river.	None	None Due to the limited nature of the new development
Swords Ground Waterbody	IE_EA_G_011		Not at Risk	None identified	Groundwater	Proposed secondary wastewater treatment plant	Unknown, as insufficient information was supplied to assess possible residual impacts