



An
Coimisiún
Pleanála

Inspector's Report PL-501177-WW-26

Development	Extension to existing pilgrim's coffee and prayer room with wastewater treatment plan and all associated site works.
Location	Lake Road, Camaderry, Glendalough
Planning Authority	Wicklow County Council
Planning Authority Reg. Ref.	2660095
Applicant(s)	Gods Cottage Charitable Trust
Type of Application	Permission
Planning Authority Decision	Refuse Permission
Type of Appeal	First Party Planning Appeal
Appellant(s)	Gods Cottage Charitable Trust
Observer(s)	None
Date of Site Inspection	27/06/26
Inspector	Donal Farrelly

Contents

1.0 Site Location and Description	3
2.0 Proposed Development	3
3.0 Planning Authority Decision	4
3.1. Decision	4
3.2. Planning Authority Reports	5
3.3. Prescribed Bodies	6
3.4. Third Party Observations	7
4.0 Planning History	7
5.0 Policy Context	10
6.0 EIA Screening	15
7.0 The Appeal	15
7.1. Grounds of Appeal	15
7.2. Applicant Response	17
7.3. Planning Authority Response	17
7.4. Observations	17
8.0 Assessment	17
9.0 AA Screening	26
10.0 Water Framework Directive	27
11.0 Recommendation	28
12.0 Reasons and Considerations	28
Appendix 1: Form 1 EIA Pre-Screening	30
Appendix 2: Form 2 - EIA Preliminary Examination	33

1.0 Site Location and Description

- 1.1. The appeal site which is currently used for religious activities is located off the R757 in Camaderry, Glendalough, Co. Wicklow. The site is located within an Area of Outstanding Natural Beauty (AONB), in close proximity to National Monuments, and the Wicklow County Development Plan 2022-2028 (CDP) identifies protected prospects no. 23 and 24 in the vicinity of the site.
- 1.2. The Glendalough Hotel is located c77m to the east of the appeal site boundary, and the Glendalough Round Tower is located c57m to the south of the appeal site boundary. The Glendasan River is located adjacent to the north of the site, which connects into the Glenealo River which flows through the Wicklow Mountains SAC.
- 1.3. The entrance to the site is located in the southeast of the site adjacent to the existing cottage, known as God's Cottage and Bible Chapel. A laneway connects from the site entrance to the pilgrim's coffee dock and prayer room building in the northwest corner of the site. A neighbouring shed located outside the redline boundary is adjacent to the existing pilgrim's coffee dock and prayer room.
- 1.4. The site is located within flood zone C as per the flood risk assessment (FRA). There is one emergency access route to the site by the R757 and bridge which is located within flood zones A and B as per the CDP.

2.0 Proposed Development

- 2.1. The proposed development comprises a 126.06m² single storey extension to the existing 80.98m² pilgrim's coffee dock and prayer room located in the northwest corner of the appeal site. The proposed extension will provide 2 no. pilgrim accommodation units and a store to support the existing religious activities on site.
- 2.2. The wastewater treatment plant is currently located behind the existing stone boundary wall in the sawmill compound in the northwest corner of the appeal site adjacent to the pilgrim's coffee dock and prayer room. This tank will be relocated c8m to the east to remain behind the stone boundary wall. The polishing filter is located between the existing cottage at the site entrance and the proposed pilgrim accommodation building. It is not proposed to move the polishing filter.

3.0 Planning Authority Decision

3.1. Decision

Permission was refused by Decision Order dated 31/03/2026 for the following reasons.

1. Having regard to:

- a) The location of the site within the 'tourist attractions zone' of the Laragh-Glendalough Land Use and Tourism Plan where it is an objective to generally not permit the development of new tourist related developments, except in limited circumstances;
- b) The design and nature of the proposed development which comprises of tourist accommodation, bathroom facilities and kitchenettes in a newly constructed building with parking facilities which fails to adopt a conservation led approach;
- c) The location of the development in a landscape area defined as an Area of Outstanding Natural Beauty within a listed prospect at the gateway/key point location into Glendalough;
- d) The location of the development within close proximity to The Monastic City of Glendalough and its associated National Monuments;
- e) The cumulative scale and size of the proposed and existing development on site which would result in visual clutter and detract from the remaining architectural heritage of the old sawmill on site;
- f) The reliance of the proposal on an artificial mound to screen the proposed development which may be generally misinterpreted within this archaeological sensitive landscape.

It is considered that the proposed development would detract from the visual amenities of the area and the setting of the Monastic Settlement of Glendalough and would therefore be contrary to Objective LG4 and LG34 of the Laragh-Glendalough Land Use and Tourism Plan 2022-2028 and CPO 8.2 and 8.10 of the 2022-2028 County Development Plan, all of which seek to protect the integrity, setting and visual amenity of the Monastic City of Glendalough and its associated National Monuments and protect, conserve and manage the built heritage of Wicklow and to

encourage sensitive and sustainable development to ensure its preservation for future generations. The proposed development would set a precedent for similar type development in this area and would therefore be contrary to proper Planning and development of the area.

2. Having regard to:

a) The failure of the SFRA to demonstrate that emergency access to the site will not be impeded via the only main access road to the site via the R757 and associated bridge in a flood event.

b) The nature of the proposed development which will likely be used by more vulnerable members of society who may have mobility issues or be impaired in some other manner which would impact on their ability to cope with or escape quickly in a flood event;

c) The lack of justification for the clear need of such a facility at this location noting its wider context in such close proximity to the Monastic City of Glendalough, and the objectives in the Laragh-Glendalough Land Use and Tourism Plan to promote Laragh Village as the main tourism hub for visitors to Glendalough;

It is considered that insufficient information has been submitted in the SFRA to fully demonstrate to the satisfaction of the Planning Authority that the proposed development is fully consistent with the "The Planning System and Flood Risk Management, Guidelines for Local Authorities". The development would set an undesirable future precedent for similar types of development on in this area and on the floodplains, would be prejudicial to public health, and would be contrary to the proper planning and sustainable development of the area.

3.2. Planning Authority Reports

3.2.1. Planning Reports

Report of Planner dated 25/03/2026 recommends a refusal of permission. This refusal was based on the following. Insufficient information in the Flood Risk Assessment (FRA), lack of justification for the need for the facility, design and nature of the development in the 'tourist attractions zone', location of the facility in an Area

of Outstanding Natural Beauty (AONB) and close to National Monuments, and impact on the architectural heritage and landscape.

3.2.2. Other Technical Reports

- Chief Fire Officer. No objection subject to conditions regarding a fire safety certificate and disability access certificate.
- Environmental Department. No objection subject to conditions regarding surface water, and the WWTS to be in accordance with the EPA Code of Practice 2021.
- Transportation Engineer. No observations received.
- Heritage Officer. The report outlines similar issues as those received by the Department of Housing, Local Government & Heritage. The proposed development is in proximity to National Monument (No. 134). Any works proposed at this location will require written Ministerial Consent. A revised architectural survey and architectural heritage impact assessment, visual impact assessment, and archaeological impact assessment and mitigation strategy are requested by way of further information.

3.3. Prescribed Bodies

- Uisce Eireann. No report received.
- Department of Culture, Communications and Sport. No report received.
- The Heritage Council. No report received.
- Inland Fisheries Ireland. No report received.
- Failte Ireland. No report received.
- Department of Housing, Local Government & Heritage. Requests the following further information. A revised Archaeological Impact Assessment. This report to include revised Architectural Heritage Impact Assessments and a detailed Architectural/Industrial Heritage Survey. A mitigation strategy regarding archaeological remains also to be included. A revised visual impact assessment is also required.

- An Taisce. No report received.

3.4. Third Party Observations

None

4.0 Planning History

Planning reference no. 2460066. new 146.18 m² single storey extension to the existing single storey 80.98 m² pilgrim's coffee dock and prayer room and all associated site works. The proposed extension will provide pilgrim guest accommodation and a store and the site works will include a small earth mound which will finish approximately 1.5m above existing ground level. Permission refused on 28/03/24 for the following reasons.

1. (a) Having regard to: The location of the site within the 'tourist attractions zone' of the Laragh- Glendalough Land Use and Tourism Plan where it is an objective to generally not permit the development of new tourist related developments, except in limited circumstances;

(b) The design and nature of the proposed development which comprises of tourist accommodation, bathroom facilities and kitchenettes in a newly constructed building with parking facilities which fails to adopt a conservation led approach;

(c) The location of the development in a landscape area defined as an Area of Outstanding Natural Beauty within a listed prospect at the gateway/key point location into Glendalough;

(d) The location of the development within close proximity to The Monastic City of Glendalough and its associated National Monuments;

(e) The cumulative scale and size of the proposed and existing development on site which would result in visual clutter and detract from the remaining architectural heritage of the old sawmill on site;

(f) The reliance of the proposal on an artificial mound to screen the proposed development which may be generally misinterpreted within this archaeological sensitive landscape;

It is considered that the proposed development would detract from the visual amenities of the area and the setting of the Monastic Settlement of Glendalough and would therefore be contrary to Objective LG4 and LG34 of the Laragh-Glendalough Land Use and Tourism Plan 2022-2028 and CPO 8.2 and 8.10 of the 2022-2028 County Development Plan, all of which seek to protect the integrity, setting and visual amenity of the Monastic City of Glendalough and its associated National Monuments and protect, conserve and manage the built heritage of Wicklow and to encourage sensitive and sustainable development to ensure its preservation for future generations. The proposed development would set a precedent for similar type development in this area and would therefore be contrary to proper Planning and development of the area.

2. (a) Having regard to: The failure of the SFRA to demonstrate that emergency access to the site will not be impeded via the only main access road to the site via the R757 and associated bridge in a flood event.

(b) The failure of the SFRA to consider the presence of the ESB owned Turlough Hill 292 MW pumped storage plant and associated water storage circa 5 km upstream from the proposed development at a much higher ground level which could result in a high velocity and sudden surge in water levels downstream in the event of a sudden release of water from this pumping station into the Glendassan River;

(c) The nature of the proposed development which will likely be used by more vulnerable members of society who may have mobility issues or be impaired in some other manner which would impact on their ability to cope with or escape quickly in a flood event;

(d) The lack of justification for the clear need of such a facility at this location noting its wider context in such close proximity to the Monastic City of Glendalough, and the objectives in the Laragh-Glendalough Land Use and Tourism Plan to promote Laragh Village as the main tourism hub for visitors to Glendalough;

It is considered that insufficient information has been submitted in the SFRA to fully demonstrate to the satisfaction of the Planning Authority that the proposed development is fully consistent with the "The Planning System and Flood Risk Management, Guidelines for Local Authorities". The development would set an undesirable future precedent for similar types of development on in this area and on

the floodplains, would be prejudicial to public health, and would be contrary to the proper planning and sustainable development of the area.

Planning reference no. 23211. for 112.5m² single storey building comprising pilgrim guest accommodation together with a separate 13.6m² store, a ground mounted 27m² solar pv array, two car parking spaces and all associated site works. Permission refused on 27/04/2023 regarding the following. Impact on visual amenities of the area, no Archaeological Impact Assessment was submitted, lack of flood risk assessment and location of development in Flood Zone A, lack of details on the installation of the waste water treatment system.

Planning reference no. 1981. modifications to Planning Permission (Register Reference 17/1514) previously granted for the renovation and change of use of a fire damaged stone saw mill building to a centre for the Patron's of God's Cottage. The proposed modifications are 1. revisions to the internal layout 2. an additional clerestorey window to the north west gable and roof light to the north east roof slope 3. demolition of the existing fire damaged rendered stone walls and their replacement with an insulated cavity wall in concrete blockwork with finish to match original render. Permission granted on 13/03/19

Planning reference no. ABP PL27.249236/17759. renovation of an existing stone saw mill annexe building, damaged by fire. The renovations will include the refurbishment of all existing enclosing stone walls, the provision of replacement roof, the provision of new south east facing wall, and other internal alterations. The application includes for a change of use (repurpose) of the former saw mill annex building into two studio guest apartments. The application is made concurrently with planning ref 17/597. Appeal refused 15/02/18 due to insufficient information regarding an overall site plan to determine the development strategy for the lands.

Planning reference no. 171514. renovation & change of use of a fire damaged stone cottage saw mill building to a Centre for the Patrons of God's Cottage. The renovations will include the refurbishment of all existing enclosing stone walls, the provision of new roof, the provision of 3 no new window opes in the existing north east facing wall, the provision of an effluent treatment system and surface water soakaway and other internal alterations. The application also includes the provision

of 1 no disabled parking within the existing courtyard. Permission granted on 30/05/18

Planning reference no. 1573. to 1. construct a single storey extension to existing Community Prayer Centre to include, a communal lounge/meeting/reading room with kitchenette, toilets, store and fire escape route, 2. relocate existing waste water treatment system and polishing filter; 3. provide two standard and two disable private car-parking spaces adjacent to the cottage, 4. upgrade of existing access roadway to former sawmill yard 5. provide one motorcoach parking space adjacent to former sawmill yard, 6. allow the use of the former sawmill yard for overflow private parking and 7. all associated site and landscaping works. Permission refused on 16/03/15 regarding the following. Lack of details on the WWTS, lack of details on the driveway and parking areas, visual impact and location in an Area of Outstanding Natural Beauty (AONB).

Planning reference no. 141894. extension to existing Community Prayer Centre to include, a communal lounge/meeting/reading room with kitchenette, toilets and store, relocation of existing package waste water treatment system and polishing filter and all associated site works. Permission refused on 27/11/14 regarding the following. Visual impact and location within a AONB, lack of details on the WWTS, impact of car parking area and driveway.

Planning reference no. 102989. change of use of existing cottage to community prayer centre and to extend existing building area for ancillary accommodation, comprising of office/ meeting room/ repository and residential accommodation and all associated site works. Permission granted on 14/07/11

5.0 Policy Context

5.1 Development Plan

- 5.1.1. The Wicklow County Development Plan 2022-2028 (CDP) is the relevant Development Plan for the appeal site. The site is located within the boundary of the Laragh-Glendalough Land Use & Tourism Plan 2022-2028. In my opinion the most relevant policies and objectives of the CDP are summarised below.

5.1.2. The site is zoned 'The Tourist Attractions Area- Glendalough' with the objective 'To enhance the visitor experience at Monastic City and Wicklow Mountains National Park, whilst also ensuring that the integrity of the heritage of the area is maintained and improved.'

5.1.3. Chapter 8 Built Heritage

CPO 8.1 To secure the preservation of all archaeological monuments included in the Record of Monuments and Places as established under Section 12 of the National Monuments (Amendment) Act, 1994, and of sites, features and objects of archaeological interest generally. In the development management process, there will be a presumption of favour of preservation in-situ or, as a minimum, preservation by record

CPO 8.2 No development in the vicinity of a feature included in the Record of Monuments & Places (RMP) or any other site of archaeological interest will be permitted which seriously detracts from the setting of the feature or which is seriously injurious to its cultural or educational value.

CPO 8.3 Any development that may, due to its size, location or nature, have implications for archaeological heritage (including both sites and areas of archaeological potential / significance as identified in Schedules 08.01 & 08.02 and Maps 8.01 & 8.02 of this plan) shall be subject to an archaeological assessment.

CPO 8.4 To require archaeological assessment for all developments with the potential to impact on the archaeological heritage of riverine, intertidal or sub tidal environments.

CPO 8.7 To support the inscription of Glendalough to Ireland's tentative UNESCO World Heritage Site list and promote a conservation led approach to facilitating visitor access and enjoyment of this internationally significant landscape.

CPO 8.10 To protect, conserve and manage the built heritage of Wicklow and to encourage sensitive and sustainable development to ensure its preservation for future generations.

CPO 8.12 To have regard to 'Architectural Heritage Protection: Guidelines for Planning Authorities' (Department of Arts, Heritage and the Gaeltacht, 2011) in the assessment of proposals affecting architectural heritage.

CPO 8.25 To protect and facilitate the conservation of structures, sites and objects which are part of the County's distinct local historical and cultural heritage, whether or not such structures, sites and objects are included on the RPS.

Schedule 8.01 ID10-Glendalough (Monastic Settlement)

Schedule 8.02 ID12-Glendalough (cathedral, Round Tower, Churches, Priory, Stone Crosses, Ringfort, hut site & cave (St. Kevins)

5.1.4. Chapter 11 Tourism and Recreation

CPO 11.10 To facilitate the development of a variety of quality accommodation types, at various locations, throughout the County.

5.1.5. Chapter 14 Flood Risk Management

CPO 14.06 To implement the 'Guidelines on the Planning System and Flood Risk Management' (DoEHLG/OPW, 2009).

CPO 14.09 Applications for new developments or significant alterations/extension to existing developments in an area at risk of flooding shall comply with the following

Chapter 17 Natural Heritage and Biodiversity

CPO 17.4 To contribute, as appropriate, towards the protection of designated ecological sites

CPO 17.5 Projects giving rise to adverse effects on the integrity of European sites

CPO 17.6 Ensure that development proposals, contribute as appropriate towards the protection and where possible enhancement of the ecological coherence of the European Site network

CPO 17.36 Any application for permission in the AONB which may have the potential to significantly adversely impact the landscape area shall be accompanied by a Landscape / Visual Impact Assessment,

CPO 17.38 To protect listed views and prospects from development that would either obstruct the view / prospect from the identified vantage point or form an obtrusive or incongruous feature in that view / prospect

Map No 17.09A and 17.09B identify Glendalough being located within The Mountain Uplands Area of Outstanding Natural Beauty (AONB)

Map No 17.11 identifies protected prospects no. 23 and 24 in the vicinity of the site.

5.1.6. Laragh-Glendalough Land Use & Tourism Plan 2022-2028

LG2 Promote the development of the Glendalough tourist experience in a more sustainable manner that involves managing the movement and experience of visitors in a way so that the integrity of the rich natural and archaeological heritage of Glendalough is protected to the highest degree, while opportunities for yielding economic benefit from the attractions are maximized.

LG3 Increase the length and quality of the stay of visitors to the area through promoting the development of new and improved tourist infrastructure (including for example tourist information, tourist accommodation, tourist shops ('tourist retail'), cafes, restaurants, public houses, tourist attractions and public infrastructure), facilities and attractions.

LG4 Within the 'Tourist Attractions Area', the planning authority will generally not permit the development of new tourist related developments, except in the following cases: (a) where a development involves the redevelopment or reuse of an existing building, (b) where a development involves an extension to an existing tourist related development, or (c) where a development is a strictly necessary addition that improves the visitor experience or that contributes to the better management of traffic and infrastructure in this area. The development of new tourist related developments will only be permitted where it is demonstrated that the integrity of the heritage sites and prospects are not diminished.

LG5 Particularly promote tourist developments that are associated with the following tourism products or themes: (i) monastic, archaeological and historical heritage, (ii) outdoor recreational activities, (iii) **retreats and spirituality**, (iv) mining heritage, (v) the Military Road, (vi) traditional skills and crafts, and (vii) natural heritage and education.

LG18 Where existing development is located within Flood Zones A or B, new development shall be limited to minor development only; any proposals for new development should be accompanied by an appropriately detailed FRA, undertaken in accordance with Section 4 of the SFRA and the relevant policies and objectives in the County Development Plan.

LG19 Facilitate developments that contribute to the achievement of a UNESCO World Heritage site status for Glendalough, which forms part of the Early Medieval Monastic Sites series, in consultation with the Department of Arts, Heritage and the Gaeltacht.

LG21 No development will be permitted that adversely affects the integrity of a European Sites. All development proposals shall comply with the following objectives

LG22 Any development that may, due to its size, location or nature, have implications for the 'Glendalough-Monastic Settlement' area of archaeological potential and significance and the 'Glendalough' major site of archaeological importance shall be subject to an archaeological assessment. No development in the vicinity of a feature included in the Record of Monuments and Places (RMP) will be permitted where it seriously detracts from the setting of the feature or which is seriously injurious to its cultural or educational value.

The Tourist Attractions Area – 'Glendalough'

LG33 All lands located within this area are considered to be within the 'rural area', and all planning applications shall be assessed on the basis of the objectives of the CDP that pertain to the 'rural area'.

LG34 To generally improve the visual amenity of the area through the following: (a) to promote the gradual decluttering of this area, (b) promote the screening of visually unattractive developments, (c) introduction of landscaping at certain locations using appropriate species of native provenance, for example in car park areas.

5.2 National/Regional Plans/Policies

National Planning Framework (First Revision)

National Policy Objective 89

Protect, conserve and enhance the rich qualities of natural, cultural and built heritage of Ireland in a manner appropriate to their cultural and environmental significance.

National Policy Objective 90

Enhance, integrate and protect the special physical, environmental, economic and cultural value of built heritage assets, including streetscapes, vernacular dwellings

and other historic buildings and monuments, through appropriate and sensitive investment and conservation.

5.4 Natural Heritage Designations

- The Wicklow Mountains SAC (002122) is located 200m south of the appeal site.
- The Wicklow Mountains SPA (004040) is located 500m west and north of the appeal site.

6.0 EIA Screening

The proposed development has been subject to preliminary examination for environmental impact assessment (refer to Form 1 and Form 2 in Appendices of this report). Having regard to the characteristics and location of the proposed development and the types and characteristics of potential impacts, it is considered that there is no real likelihood of significant effects on the environment. The proposed development, therefore, does not trigger a requirement for environmental impact assessment screening and an EIAR is not required.

7.0 The Appeal

7.1. Grounds of Appeal

The first party appeal was received from a consultant acting on behalf of the appellant and includes a copy of the PA's report, and letter from the appellant. The submission is summarised as follows.

Principle of development

- Permission was granted for a prayer room with ancillary uses under Planning Ref no. 102989.
- The decision under PL27.249236 opposed development as there was insufficient information regarding a development strategy for the overall site. The proposal under PL27.249236 was acceptable in principle.
- Other planning applications show acceptance of the religious activity on site in terms of principle of development.

- Provision of accommodation for pilgrims would be acceptable in principle. The PA assessment does not oppose the principle of development.
- The land is located within the settlement of Glendalough.
- The proposed development will be short stay accommodation linked to the adjacent religious development and would not provide general tourist facilities. The existing property accommodates two detached buildings comprising a café, religious bookstore and oratory. These uses were endorsed under previous planning permissions.
- The proposed pilgrim accommodation will be ancillary to the existing buildings and uses on site.
- S11.1.4 and Objective LG5 of the CDP are relevant. The site is located within the 'Tourist Attractions Area-Glendalough'.
- Refusal reason overlooks previous planning decisions and seeks to revive previous objections which were dismissed by ABP under PL27.249236.

Flood Risk

- The second reason for refusal outlined that insufficient information was submitted in the SFRA to demonstrate the development is fully consistent with 'The Planning System and Flood Risk Management, Guidelines for Local Authorities'. The appellant outlines that the flood risk concerns regarding emergency access and access for vulnerable members of society are not relevant and that there are existing buildings on site which would be impacted more regarding flood risk. ABP already decided that the site is not constrained by flooding under **Planning reference no. ABP PL27.249236**
- The refusal is at variance with the PA environmental report. The chief fire officer raises no objection.
- Patrons will be able to reschedule visits in the event of storms, and the site is not in a floodplain.

Use and proposal

- A letter which was included from the appellant confirms that the proposal is for pilgrim development. They outline the requirements for pilgrim

accommodation and that this proposal is unique to Glendalough. The development is small scale. They previously turned the Caretakers Cottage into a prayer room and are seeking the same number of accommodation places as were once part of the cottage.

- The building to be replaced was burned down in a previous arson attack. They are proposing a single storey replacement structure considering the previous refusal for a two storey building.
- The shed to be replaced was a centre of human industry and not a cattle shed.
- The Department of Heritage recommended that a grade 1 architect be employed, and the appellant has done this.
- The proposal includes repairs to the sawmill yard wall, and an interior walkway.
- The proposal represents a decluttering of the original yard.
- The PA previously objected to a mound which was not included in the recent plans.

7.2. Applicant Response

None

7.3. Planning Authority Response

None

7.4. Observations

None

8.0 Assessment

- 8.1. Having examined the planning application details and all other documentation on file, including the submission received in relation to the appeal, the report 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
- Architectural heritage and visual impact
- Archaeology
- Flooding
- Wastewater treatment system

8.2. Principle of development

- 8.3. The appeal site is located within a high amenity area and within an Area of Outstanding Natural Beauty. Protected prospects no. 23 and 24 are located within the vicinity of the site, and the site is located in close proximity to National Monuments no. 134 and the Monastic City of Glendalough. The existing coffee dock and prayer room building located in the northwest corner of the appeal site within the sawmill compound was previously destroyed in a fire and was rebuilt. An adjacent building which was also destroyed in the fire was not rebuilt, with this building located in the same general area as the proposed extension.
- 8.4. The proposed development comprises a 126.06m² single storey extension to the existing 80.98m² pilgrim's coffee dock and prayer room building. The proposed extension will provide pilgrim accommodation in 2 no. units and a store. The accommodation units are each one bedroom with an ensuite, a kitchenette, and living/dining area.
- 8.5. I note the current reason for refusal regarding the location of the site within The Tourist Attractions Area – 'Glendalough' of the CDP; provision of new tourist accommodation; location within an AONB and visual impact on protected prospects; size and scale of the development and impact on the architectural heritage of the sawmill; and location in close proximity to National Monuments and the Monastic City of Glendalough. I also note that the proposed development was subject to a number of previous refusals.
- 8.6. Having undertaken a site visit I am satisfied that the existing site is utilised for religious activities. I have considered the planning history associated with the site,

and the history of the sawmill compound. Having also reviewed the documentation and appeal submission I consider that the proposed development to comprise 2 no. dwelling units for pilgrim accommodation to be used by people attending the existing on site religious facilities would be a complementary use to the established religious activities of the site.

- 8.7. Objective CPO 11.10 of the CDP seeks to facilitate the development of a range of accommodation types within the County. LG5 of the Laragh-Glendalough Land Use & Tourism Plan 2022-2028 (Tourism Plan) promotes tourist developments that are associated with retreats and spirituality. LG2 and LG3 of the Tourism Plan are supportive of tourism through the provision of appropriate tourist infrastructure and facilities.
- 8.8. The reason for refusal regarding LG4 outlines that new tourist related developments are only permitted in limited circumstances within the Tourist Attractions Area. I consider LG4 (b) and (c) to be applicable to the appeal site in that the proposed development constitutes an extension of the existing tourist facilities on site and will enhance the visitors experience. The extension of activities includes a new accommodation use which I consider supports the religious and retreat activities of the site. I therefore do not agree with the PA in that the proposed development would be contrary to Objective LG4.
- 8.9. Having regard to Objective CPO 11.10 of the CDP, LG4 of the Laragh-Glendalough Land Use & Tourism Plan 2022-2028 which permits new tourist related developments that involve an extension to an existing tourist related development and improves the visitor experience, and LG5 of the Laragh-Glendalough Land Use & Tourism Plan 2022-2028 which promotes tourist developments that are associated with retreats and spirituality.
- 8.10. I am therefore satisfied that the principle of development is acceptable and conforms with the CDP. However, the design and form of the development is subject to other planning considerations further detailed below.
- 8.11. Architectural heritage and visual impact

There are a number of important heritage constraints associated with development on the appeal site. There are no protected structures located on site. The appeal site is located within an AONB and Map No 17.11 of the CDP identifies protected

prospects no. 23 and 24 in the vicinity of the site. There are also a number of National Monuments located circa 150m-200m south of the sawmill compound. These include the following.

- WI023-008002- : National Monument in state ownership No. 134 and includes the following. Cathedral, Round Tower, Churches, Priory (Augustinian), Crosses, ringfort, hut site & cave (St. Kevin's).

The following ancient structures are also located in close proximity of the site.

- WI023-004001 and WI023-004- Bullaun stones. Both are located to the east and adjacent to the sawmill compound.
- WI023-006004, WI023-006003, WI023-006001- Bullaun stones. Located adjacent to the appeal site southeast of the sawmill compound.

8.12. The existing coffee dock and prayer room building within the sawmill compound was previously destroyed in a fire and was rebuilt. An adjacent building which was also destroyed in the fire was not rebuilt, with elements of this building proposed to be repaired as part of the development. Wall repairs are also proposed to the southwest corner of the sawmill compound.

8.13. I note the Heritage Impact Assessment (HIA) completed by a grade 1 conservation architect which was submitted to the PA. This includes the history of the sawmill compound and overall site. The report outlines that the existing structures including the old walls of the sawmill enclosure are identified as being of low significance but that the overall site makes a significant contribution to the architectural heritage of the region.

8.14. The report outlines that the proposed architectural design has taken into account the heritage issues of the HIA, and that the design will fit in with the existing architectural form. The report concludes that the proposed development will not impact on the significance of the appeal site or surrounding area.

8.15. I have considered the proposed design and acknowledge that the applicant has completed a HIA and Visual Impact Assessment (VIA). I note the responses from both the PA Heritage Officer (HO) and the Department, with the details of the responses being generally the same in that the information provided is not sufficient. The responses from the Heritage Officer and the Department request further

information regarding a survey of site heritage, and appropriate mitigation measures to conserve the remaining historic elements. Further details are required regarding screening, design details of the proposed extension to be demonstrated to be of a high standard, and a revised visual impact assessment is required to incorporate a wider range of viewpoints. The Commission should note however that the PA did not request further information and instead refused the application. No revised design was submitted to reflect the reports received from the HO and Department.

- 8.16. I acknowledge that the PA refused the application and did not request further information, and no revised design was submitted. However, I consider that the building design would also need to be informed and justified by the content included within the responses received by the Department and the Heritage Officer. This includes a revised architectural survey and architectural heritage impact assessment to provide more details on the existing heritage aspects of the site, and visual impact assessment to include views across the monastic precinct.
- 8.17. The main floor area of the proposed extension is 14.75m long with a front projecting 3m porch and 4.56m rear projection store room. This extension will project 5.8m forward of the existing coffee dock and prayer room building. The majority of the extension will be flat roofed with a pitched roof element proposed to the front section of the extension.
- 8.18. I consider the scale of the extension to be excessive in terms of size, and the large projecting element to the front dominates the existing building on site. I therefore consider this design not to be appropriate considering it is located within an AONB and would not be in accordance with CPO 17.38. I also do not consider this extension design to be representative of the previous sawmill building on site, or reflective of the historical activities of the site. I consider that the proposed development does not conform with LG34 of the Tourism Plan regarding de cluttering of the area and will impact on the heritage of the site and AONB in its current form.
- 8.19. I note the use of slates on the pitched roof element of the extension and copper seam cladding on the front entrance lobby. However, I do not consider the extensive use of an external render to be appropriate to reflect the heritage aspects of this site or the previous sawmill building which was destroyed in the fire. Having regard to the

above I consider that the development in its current form does not comply with CPO 8.10 which seeks to protect built heritage, and CPO 8.25 which seeks the conservation of sites of historical heritage.

- 8.20. I am of the opinion that viewpoints in the VIA are not extensive enough and sufficient and consider that additional viewpoints are also required across the national monument site to the appeal site. The VIA images are unclear regarding the location of the structure on site and I consider that a revised VIA should show more clearly the location of the structure on site from additional viewpoints to fully understand the visual impact on the site and surrounding area. I therefore consider the development in its current form not to be in accordance with CPO 8.2 and CPO 17.38 regarding understanding fully the impact of the proposed development on the national monument, AONB, and protected prospects of the area.
- 8.21. I am therefore not satisfied regarding the current design proposal. I am of the opinion that the proposed extension to the existing coffee dock and prayer room building is excessive and does not constitute a design that is appropriate for this sensitive historical and heritage area and is not representative of the former sawmill activities of this site.
- 8.22. I therefore recommend to the Commission that the proposed development should be refused due to its uncharacteristic design in close proximity to a national monument, within an AONB and in close proximity to protected prospects. The proposed development would be contrary to CPO 8.10, CPO 8.2, CPO 8.25, and CPO 17.38 of the CDP regarding impact on the national monument, AONB, and historical heritage of the area. The development would also be contrary to LG34 of the Tourism Plan regarding de cluttering of the area and will impact on the heritage of the site and AONB in its current form due to its scale and design.
- 8.23. Artificial Mound
- 8.24. I note refusal reason 1(f) regarding the artificial mound. This mound is not referenced in the current application including the section drawing no. 1221/33 and therefore I do not consider it relevant.
- 8.25. The appellant outlines that the reason for refusal regarding the artificial mound is not applicable for the current application. I note that this was a proposed mitigation measure outlined in the visual impact assessment submitted under planning

reference number 24/60066 and comprised of using soil to create an artificial mound for the purpose of creating a visual screening of the development.

8.26. I therefore recommend to the Commission that the refusal reason regarding the proposed artificial mound is not applicable.

8.27. Archaeology

8.28. Archaeology was not raised in the grounds of appeal but I have assessed this section due to the sensitive nature of the site located adjacent to a number of ancient monuments and the potential for archaeological remains. I note the findings of the Archaeological Impact Assessment (AIA) submitted to the PA. The report outlines that the design is a significant improvement from that refused under 24/60066, and design changes reflect the recommendations of the Department of Housing, Local Government and Heritage (Department). This latest design includes a reduction in the development footprint and retention of more historic elements on site.

8.29. The AIA considers that potential archaeological impacts are deemed to be moderate and localised. I note that the site has been subject to previous development and that there are no archaeological remains identified on site. I am satisfied that appropriate mitigation measures including archaeological monitoring of works are deemed appropriate with a planning condition in the event of a grant of permission.

8.30. Flooding

8.31. The flood zone map in the Laragh-Glendalough Land Use and Tourism Plan 2022-2028 which forms part of the CDP identifies the majority of the northwest and southeast sections of the site as being located within Flood Zones A and B. The National Indicative Flood Mapping shows part of the northwest section of the site at risk of flooding but it is unclear the full extent of this flooding area due to the resolution of the map.

8.32. The site specific flood risk assessment (SSFRA) submitted by the applicant to the PA references the CDP flood risk map, but identifies the development area of the appeal site as being located within Flood Zone C with ground levels 460mm above the maximum flood level in the Glendassan River as it passes this location.

8.33. I note the reason for refusal regarding flooding and the details submitted by the appellant in their appeal submission. The reason for refusal was regarding

emergency access to the site and impact on vulnerable people, and lack of justification for a facility at this location.

- 8.34. I have considered the site specific flood risk assessment submitted to the PA and which accompanied the application and note that the planners report outlined that the same site specific flood risk assessment was submitted under planning reference 24/60066, and that the appellant did not address the previous reason for refusal.
- 8.35. As per Table 3.1 of The Planning System and Flood Risk Management Guidelines 2009 'Land and buildings used for holiday or short-let caravans and camping, subject to specific warning and evacuation plans' are classified as 'Less vulnerable development'. The proposed development comprises short term tourist accommodation to support the existing retreat and religious activities of the site.
- 8.36. As per Table 3.2 of the 2009 Guidelines less vulnerable development is appropriate for Flood Zone B, with a justification test required for Flood Zone A. If a justification test is required then it must have regard to Box 5.1 of the 2009 Guidelines. S5.28 of the 2009 Guidelines outlines that minor development including extensions to existing commercial enterprises are unlikely to raise significant flooding issues unless they introduce a significant number of people into the flood risk area, and the justification test does not apply. Having regard to Flood Zone A and s5.28 I do not consider 2 no. accommodation units to represent a significant number of people being introduced into the area.
- 8.37. I note that the site specific FRA also includes a justification test which satisfies Part 1 and 2, but outlines that this is not required as the development site is located in Flood Zone C.
- 8.38. The site specific FRA outlines that finished floor level would be 135.35mOD. The report also outlines that emergency vehicles will be able to access the site during a 0.1 Annual Exceedance Probability (AEP) flood event.
- 8.39. The PA note the findings of the FRA but outline that the report does not consider the R757 and bridge regarding access to the site which are located in Flood Zone A. The PA in their reason for refusal outlines that there is only one emergency access to the site which would be impeded in the event of flooding, and that flooding would impact on vulnerable people including those with mobility issues.

- 8.40. The appellant submitted details to the PA which outlines that weather protocols are in place for the facility considering the potential for road flooding in the Glendalough area. This outlines that the facilities are closed during red alerts, orange alerts for rain or snow, and that yellow alerts for rain requires a case by case assessment of the situation. As identified in the SSFRA any potential flooding would be around the access bridge which is located southwest of the site entrance.
- 8.41. I acknowledge that the access to the site on the public road is located in Flood Zone A. However, I consider the short term pilgrim accommodation to represent less vulnerable development which is an extension of an existing commercial type use. Having regard to the finished floor levels of the proposed building which achieve the appropriate freeboard requirements, and weather protocols in place with respect to managing health and safety, I consider that the development is acceptable in terms of flood risk and complies with s5.28 of the 2009 Flood Risk Management Guidelines.

ESB Letter

- 8.42. I note the appellant submitted a letter from the ESB to the PA. This is in response to one of the previous reasons for refusal under planning reference 24/60066 regarding the potential sudden discharge of water from the ESB storage plant at Turlough Hill.
- 8.43. **Wastewater treatment system**
- 8.44. The appellant seeks to move the approved wastewater treatment tank but maintain the approved polishing filter in situ. The Commission should note that was not raised in the grounds of appeal but forms part of the submission to the PA.
- 8.45. The appellant proposes to move the wastewater treatment tank c8m to the east and maintain its position behind the stone wall within the sawmill compound. A car parking space is shown on the site layout plan in place of the current position of the wastewater treatment tank. I note that the polishing filter approved under 17/1514 will remain in situ.
- 8.46. I note the EHO outlined within their response under 24/60066 that the wastewater treatment system was approved under planning reference no.171514 and had no adverse comment to make regarding the WWTS. The site characterisation form associated with 17/1514 is based on trial hole data from 2017. This report had

regard to the 2009 EPA Code of Practice Wastewater Treatment and Disposal System serving single houses.

- 8.47. The report of the EHO under the current submission to the PA 26/60095 noted that the repositioning of the wastewater treatment tank would need to be carried out in accordance with the EPA Code of Practice 2021. The EHO notes that the installed tank is sized to cater for the existing prayer area and 2x1 no. bed apartments. They also note that condition 9 of 17/1514 was deemed in compliance, which is regarding the 2009 EPA Code of Practice. I note that the Planners report had no additional comments regarding the relocation of the wastewater treatment tank.
- 8.48. Notwithstanding the above the appellant seeks to relocate the wastewater treatment tank, which is approved under the 2009 EPA Code of Practice. However, in order to relocate the tank the appellant would need to demonstrate that the tank will be installed in accordance with the 2021 EPA Code of Practice, which is also noted by the PA. I am satisfied that a suitable planning condition can address this in the event of a grant of permission.

9.0 AA Screening

- 9.1. I have considered the project in light of the requirements of S177U of the Planning and Development Act 2000 as amended. The subject site is located at Lake Road, Camaderry, Glendalough, Co. Wicklow approximately 200m north of the Wicklow Mountains SAC (002122), and 500m east and south of the Wicklow Mountains SPA (004040).

The permission is for a 126.06m² single storey extension to the existing 80.98m² pilgrim's coffee dock and prayer room located in the northwest corner of the appeal site. The proposed extension will provide pilgrim accommodation and a store. The wastewater treatment tank will be relocated c8m to the east within the sawmill compound. The proposed development will connect to the existing WWTS on site. A surface water soakaway will be provided.

Having considered the nature, scale and location of the project, I satisfied that it can be eliminated from further assessment because it could not have an effect on a European Site.

The reason for this conclusion is as follows:

- The PA have carried out an appropriate assessment screening and concluded that the development would be unlikely to give rise to any significant adverse impacts on the qualifying interests or conservation objectives of any natura site.
- The minor works and scale of the development.
- The site is located adjacent to the Glendasan River which flows into the Wicklow Mountains SAC via the Glenealo River located to the south. Having regard to the WWTS and onsite soakpit I am satisfied that there are no hydrological connections to the European site. In the event of a grant of permission a suitable planning condition would ensure that appropriate construction measures are in place regarding protection of the European site.

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.

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. 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, together with relevant guidance published by the Environmental Protection Agency (Ireland), including applicable codes of practice for the protection of water quality. 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.

Foul connection will be to the existing wastewater treatment system, and on site surface water will be to a soakpit.

The development will not adversely affect the achievement of established environmental objectives, including the maintenance or attainment of Good Ecological Status/Potential and Good Chemical 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 to the Commission that retention permission be refused for the reasons and considerations set out below.

12.0 Reasons and Considerations

1. Having regard to:

a) The design and nature of the proposed development which comprises of tourist accommodation, bathroom facilities and kitchenettes in a newly constructed building with parking facilities which fails to adopt a conservation led approach;

b) The location of the development in a landscape area defined as an Area of Outstanding Natural Beauty within a listed prospect at the gateway/key point location into Glendalough;

c) The location of the development within close proximity to The Monastic City of Glendalough and its associated National Monuments;

d) The cumulative scale and size of the proposed and existing development on site which would result in visual clutter and detract from the remaining architectural heritage of the old sawmill on site;

It is considered that the proposed development would detract from the visual amenities of the area and the setting of the Monastic Settlement of Glendalough and would therefore be contrary to Objective LG34 of the Laragh-Glendalough Land Use and Tourism Plan 2022-2028 and CPO 8.2 and 8.10 of the 2022-2028 County Development Plan, all of which seek to protect the integrity, setting and visual amenity of the Monastic City of Glendalough and its associated National Monuments and protect, conserve and manage the built heritage of Wicklow and to encourage sensitive and sustainable development to ensure its preservation for future

generations. The proposed development would set a precedent for similar type development in this area and would therefore be contrary to proper Planning and 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.

Donal Farrelly
Planning Inspector

23/07/26

Appendix 1: Form 1 EIA Pre-Screening

Case Reference	PL-501177-WW-26
Proposed Development Summary	The proposed development comprises a 126.06m² single storey extension to the existing 80.98m² pilgrim's coffee dock and prayer room located in the northwest corner of the appeal site. The proposed extension will provide pilgrim accommodation and a store. The wastewater treatment tank will be relocated c8m to the east to remain behind the stone boundary wall in the northwest corner of the site. It is not proposed to move the polishing filter.
Development Address	Lake Road, Camaderry, Glendalough
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?	☒ Yes, it is a 'Project'. Proceed to Q.2.
	☐ 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)?	
☐ 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
☒ 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?	
☐ 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.	
☐ Yes, the proposed development is of a Class and meets/exceeds the threshold. EIA is Mandatory. No Screening Required	
☒ Yes, the proposed development is of a Class but is sub-threshold.	Class 10 (b) Construction of more than 500 dwelling units. The proposal is for 2 no. dwelling units for pilgrim accommodation.

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

Inspector: _____ **Date:** _____

Appendix 2: Form 2 - EIA Preliminary Examination

Case Reference	PL-501177-WW-26
Proposed Development Summary	The proposed development comprises a 126.06m² single storey extension to the existing 80.98m² pilgrim's coffee dock and prayer room located in the northwest corner of the appeal site. The proposed extension will provide pilgrim accommodation and a store. The wastewater treatment tank will be relocated c8m to the east to remain behind the stone boundary wall in the northwest corner of the site. It is not proposed to move the polishing filter.
Development Address	Lake Road, Camaderry, Glendalough
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).	The development has a modest footprint, comes forward as a standalone project, does not require demolition works, does not require the use of substantial natural resources, or give rise to significant risk of pollution or nuisance. The development, by virtue of its type, does not pose a risk of major accident and/or disaster, or is vulnerable to climate change. It presents no risks to human health.

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 environment e.g. wetland, coastal zones, nature reserves, European sites, densely populated areas, landscapes, sites of historic, cultural or archaeological significance).	The development is situated on tourism zoned land within an established religious facility. The development is within an AONB, and adjacent to landscapes of identified significance in the County Development Plan.
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).	Having regard to the modest nature of the proposed development, its location with respect to sensitive habitats/features, likely limited magnitude and spatial extent of effects, and absence of in combination effects, there is no potential for significant effects on the environmental factors listed in section 171A of the Act.

Conclusion	
Likelihood of Significant Effects	Conclusion in respect of EIA
There is no real likelihood of significant effects on the environment.	EIA is not required. The proposed development has been subject to preliminary examination for environmental impact assessment (refer to Form 1 and Form 2 in Appendices of this report). Having regard to the characteristics and location of the proposed development and the types and characteristics of potential impacts, it is considered that there is no real likelihood of significant effects on the environment. The proposed development, therefore, does not trigger a requirement for environmental impact assessment screening and an EIAR is not required.

Inspector: _____ Date: _____

DP/ADP: _____ Date: _____

(only where Schedule 7A information or EIAR required)