



An
Coimisiún
Pleanála

Inspector's Report

PL-501367-CE-26

Development	External render to the front (south-west) and rear (north-east) facades of the existing two storey dwelling.
Location	4 Riverview Terrace, New Road, Ennistymon, County Clare.
Planning Authority	Clare County Council
Planning Authority Reg. Ref.	2660130
Applicants	Brian and Kathleen Gorman.
Type of Application	Permission.
Planning Authority Decision	Refusal of permission.
Type of Appeal	First Party
Appellants	Brian and Kathleen Gorman

Observers

None

Date of Site Inspection

23rd July 2026.

Inspector

Derek Daly

1.0 Site Location and Description

- 1.1. The site is located in the town of Ennistymon in the west of County Clare in a terrace of two storied dwellings Riverview Terrace which is a traditional terrace of similar vernacular dwellings located on Station Road and N85 on the southern approach to the central area of the town. There are similar properties on either side of the subject site. The external finish of the front elevation is render and is painted. The front elevation adjoins the inner edge of the public footpath. The property has a rear garden area and there is a high retaining wall along the rear boundary.
- 1.2. The site has a stated area of 0.009 hectares.

2.0 Proposed Development

- 2.1. The proposed development as received by the planning authority on the 5th March 2026 was for an external render with a depth of 100mm to the front (south-west) and rear (north-east) facades of the existing two storey dwelling.
- 2.2. The floor area of the dwelling is stated as 74.00 m². No additional floor space is proposed. No alterations are proposed to the front and rear elevations other the external render.

3.0 Planning Authority Decision

3.1. Decision

- 3.1.1. The decision of the Planning Authority was to refuse planning permission and one reason was stated which refers to;
- 3.1.2. The subject site is located within the Architectural Conservation Area (ACA) of Ennistymon, where it is an objective of the Development Plan as set out under CDP 16.5 to ensure that new developments within or adjacent to an ACA respect the established character context of the area and contribute positively to the ACA in terms of design, scale, setting and material finishes. The proposed external cladding, notwithstanding its stated purpose of improving energy efficiency, would represent an unsuitable intervention within the streetscape at this location, which would

negatively alter the external appearance, proportions and architectural detailing of the structure itself and which would undermine the established character and visual coherence of the streetscape. The proposal would therefore adversely affect the character of the architectural conservation area and would be contrary to the proper planning and development of the area.

3.2. Planning Authority Reports

3.2.1. Planning Reports

The planning report dated the 27th April 2026 refers to the planning history, development plan provisions and an assessment of the development.

3.2.2. The assessment focused on the principle of development and built heritage; flood risk and archaeology.

3.2.3. The report refers to the purpose of this is to provide external insulation; refers to the subject site is located within the Ennistymon Architectural Conservation Area and forms part of a terrace which is an important example of historic urban development and the architectural quality of the terrace means that it warrants safeguarding. The report refers to the document Improving Energy Efficiency in Traditional Buildings: Guidance for Specifiers and Installers which outlines appropriate methods for improving energy efficiency in traditional buildings in accordance with conservation best practice, the applicant has not demonstrated compliance with this guidance nor clearly outlined why alternative insulation measures have not been considered, particularly given the terraced nature of the building. The proposed development includes an external render with a depth of over 100 mm to the existing terraced dwelling. This would create a 'step' in the streetscape and there are concerns regarding the potential impact of external insulation on the external appearance of the dwelling and the overall coherence of the terrace. The subject dwelling forms a pair with the adjoining no. 3, with a clear consistency in proportions and scale between the two buildings. This consistency would be lost with the addition of external insulation. The existing gutter, which is contiguous with the adjoining dwelling, would also likely require removal. It is difficult to see how this could be successfully addressed without adverse impact on the built heritage character of the terrace.

3.2.4. The report then concluded that while the proposed development is acceptable in principle, the use of external insulation on the subject dwelling would result in an adverse impact on the character and architectural coherence of the terrace within the Ennistymon Architectural Conservation Area. The proposal would therefore fail to adequately protect the built heritage value of the terrace and is not considered an appropriate form of development in this sensitive historic context. Refusal of permission was recommended.

3.3. Other submissions

The West Clare MD offered no observations or comments.

No other submissions were received.

4.0 Planning History

4.1.1. On site: No history.

4.1.2. Relevant Nearby:

P.A. Ref. No. P12/185. An application to retain and complete internal alterations and alterations to elevations and to retain and complete construction of an extension to the rear at No. 3 Riverview Terrace was granted planning permission subject to 4 conditions.

4.1.3. UD24-056 Unauthorised development complaint relating to the subject of this application.

5.0 Policy and Context

5.1. Development Plan

5.1.1. The statutory development plan is the Clare County Development Plan 2023–2029.

5.1.2. The subject site is zoned as ‘existing residential’ with the objective to conserve and enhance the quality and character of the areas, to protect residential amenities and to allow for small scale infill development which is appropriate to the character and pattern of development in the immediate area and for uses that enhance existing residential communities.

5.1.3. The site is located within the Ennistymon Architectural Conservation Area and CDP 16.5 Architectural Conservation Areas (ACAs) indicates that it is an objective of Clare County Council:

- a) To ensure that new developments within or adjacent to an ACA respect the established character context of the area and contribute positively to the ACA in terms of design, scale, setting and material finishes;
- b) To protect from demolition or removal and non-sympathetic alterations, existing buildings, structures, groups of structures, sites, landscapes and features such as street furniture and paving, which are considered to be intrinsic elements of the special character of the ACA;
- c) To ensure that all new signage, lighting, advertising and utilities to buildings within an ACA are designed, constructed and located in a manner that does not detract from and is complementary to the character of the ACA; and
- d) To ensure that external colour schemes in ACAs enhance the character and amenities of the area and reflect traditional colour schemes.

5.1.4. Section 2.9.2 of the CDP refers to Energy Efficiency and Conservation Energy and that the Council will support and encourage the implementation of programmes to enhance energy efficiency and conservation including the Sustainable Energy Authority of Ireland (SEAI) 'Better Energy Homes Programme' and the 'Better Energy Communities Programme'.

5.2. National Guidance

5.2.1. Improving Energy Efficiency in Traditional Buildings Guidance for Specifiers and Installers Department of Housing, Local Government and Heritage 2023.

The guidance refers to Ireland has set ambitious targets to reach to reduce greenhouse-gas emissions and meet international commitments on climate change mitigation. Improving energy efficiency in the traditional building stock is key to meeting these commitments and while the emphasis on the energy retrofit of buildings is important, the integrity of our traditional buildings needs to be respected when changes are being made so that the works undertaken do not damage the character and special interest of a historic building.

Section 3.4.5 refers to solid walls and sections 3.4.5.1 to Internal Wall Insulation (IWI) and 3.4.5.2 to External Wall Insulation (EWI) noting loss of habitable living space in relation to IWI and that IWI is usually the preferred option for buildings with exposed brick, ashlar stone and/or interesting external detailing or for buildings where only the façade is protected. In relation to EWI, the guidance notes that for a traditional building that does not have a significant exterior that is to be protected, the application of EWI may be possible and that EWI may change the external appearance of a building and where it would render the structure inconsistent with the neighbouring building. In the case of terraced or semi-detached buildings, careful consideration needs to be given to the risk of thermal bridging at party walls and how this can be mitigated. In addition, external detailing at these junctions needs to be very carefully considered from an aesthetic point of view.

5.3. Natural Heritage Designations

- 5.3.1. The subject site is not located within a site designated as a Natura 2000 site or NHA/pNHA.

6.0 EIA Screening

- 6.1. The proposed development is not a Class to which Schedule 5 of the Planning and Development Regulations, 2001, as amended, applies and therefore, the requirement for submission of an EIAR and carrying out of an EIA may be set aside. I refer in this regard to Form 1 - EIA Pre-Screening attached to this report.

7.0 The Appeal

7.1. Grounds of Appeal

The appellants grounds of appeal in summary refers to;

- There is reference to the current statutory provisions of the development noting the site is located within the Ennistymon ACA at its periphery but the proposal is neutral and will not impact on the ACA and the provisions relating to the ACA do not specifically mention Riverview Terrace.

- No unique or specific features of Riverview Terrace are identified and its contribution to the ACA is that it is a curved terrace to the south of the town centre.
- The addition of the external render will be uniform across the façade and the step in the façade will be almost indiscernible given the limited depth and there are multiple steps in this curved terrace and a number down pipes which are referred to in photographs submitted with the grounds.
- The reason for the external insulation is the small internal area of the property.
- Reference is made to section 2.9.2 of the CDP in relation to energy efficiency and the development complies with the provisions stated.
- Reference is made to objective 16.5 of the CDP and will comply with the objective will not materially change the external appearance of the external façade, the post installation will for all intents and purposes be identical to the existing appearance and the existing colour can be matched if required.

7.2. Planning Authority Response

- 7.2.1. The planning authority in a response dated the 29th May 2006 refers the appeal site and its paired composition with no 3 and while the guidance in relation to energy efficiency promote sensitive upgrading the appellant has not demonstrated why less visually intrusive measures have not pursued and fails to protect the built heritage value of the structure and is considered inappropriate in this sensitive historic context.

7.3. Other Submissions.

- 7.3.1. The appeal was referred to statutory bodies by An Coimisiún Pleanála under Section 131 of the Planning and Development Act 2000 as amended and no responses were received.

8.0 Assessment

- 8.1. The main issues in this appeal relate to the principle of the development and issues as stated in the grounds of appeal. Appropriate Assessment also requires to be considered. I am satisfied that no other substantive issues arise.
- 8.2. In relation to the principle the proposal to provide for improving the energy efficiency of the dwelling is in principle acceptable. The primary issue arising is on relation to nature of the development as proposed which is for the application of an external render with a depth of 100mm to the front (south-west) and rear (north-east) facades of the existing two storey dwelling.
- 8.3. It is noted that the dwelling forms part of a terrace which is located in an ACA which is harmonious and relatively uniform in appearance and is also a visually important terrace on the approach to the town.
- 8.4. The grounds contend that the site is located within the Ennistymon ACA at its periphery that the proposal is neutral and will not impact on the ACA and the provisions relating to the ACA. As stated, the terrace occupies an important location on the entry to the town and is I consider visually important in this regard.
- 8.5. It is contended that these is no unique or specific features of Riverview Terrace are identified and the addition of the external render will be uniform across the façade and the step in the façade will be almost indiscernible given the limited depth and there are multiple steps in this curved terrace and a number down pipes. In relation to the grounds as raised the curved nature of the terrace is noted but the terrace is formed by groups of properties with uniform elevations which are flush with each other and the only feature which features externally is the down pipes which are an accepted feature on the external elevation of buildings.
- 8.6. In relation to the whether the step would be indiscernible I do not consider this would be the case and it would represent a significant visual alteration in the uniform composition of the terrace of which the appeal site forms part.
- 8.7. While noting the CDP in section 2.9.2 promotes energy efficiency and as such the development complies with the provisions stated and that the limited internal floor area requires a design solution incorporating External Wall Insulation (EWI) rather than Internal Wall Insulation (IWI) it is considered that the dwelling's location as part

of a terrace of similar properties in an ACA requires, to be taken into account. National Guidance as stated in Improving Energy Efficiency in Traditional Buildings Guidance for Specifiers and Installers Department of Housing, Local Government and Heritage 2023 does acknowledge notes that while the emphasis on the energy retrofit of buildings is important but the integrity of our traditional buildings needs to be respected when changes are being made so that the works undertaken do not damage the character and special interest of a historic building. Although IWI it is accepted can result in a loss of habitable living space IWI is usually the preferred option for buildings with interesting external detailing of buildings. In relation to EWI, the guidance notes that for a traditional building that does not have a significant exterior that is to be protected, the application of EWI may be possible.

- 8.8. In this particular instance I consider that the EWI does and would in a material way change the external appearance of a building which would render the structure inconsistent with the neighbouring building and buildings from an aesthetic point of view.

9.0 AA Screening

- 9.1. I have considered the proposal for the application of an external render to the front (south-west) and rear (north-east) facades of the existing two storey dwelling
- 9.2. The development comprises in effect a relatively minor development as outlined in section 2 in the Inspectors report. Having regard to the location, nature and scale of the proposed development confined within an established residential property, and the absence of connectivity to European sites it is concluded that no Appropriate Assessment issues arise as the proposed development would not be likely to have a significant effect individually or in combination with other plans or projects on these European sites.

10.0 Water Framework

- 10.1. The subject site is not located immediate to a waterbody The development comprises minor construction works as referred to in section 2 of this report. No water deterioration concerns were raised in the planning appeal.

10.2. I have assessed the proposed development 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 and ground water waterbodies in order to reach good status (meaning both good chemical and good ecological status), and to prevent deterioration. Having considered the nature, scale and location of the project, I am satisfied that it can be eliminated from further assessment because there is no conceivable risk to any surface and/or groundwater water bodies either qualitatively or quantitatively. The reason for this conclusion is as follows:

- Nature of works regarding the nature and scale of the development.
- The context of the surrounding area.
- Location and distance from nearest Water bodies and lack of hydrological connections.

Conclusion

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

11.0 Recommendation

11.1. I recommend that permission be refused.

12.0 Reasons and Considerations

12.1. Having regard to the design and nature of the proposed development and the pattern and character of development in the vicinity; its location within the Architectural Conservation Area (ACA) of Ennistymon, where it is an objective of the Development Plan as set out under CDP 16.5 to ensure that new developments within or adjacent to an ACA respect the established character context of the area and contribute positively to the ACA in terms of design, scale, setting and material finishes the provisions of which are considered to be reasonable. The proposed external cladding, therefore, notwithstanding its stated purpose of improving energy

efficiency, would represent an unsuitable and inappropriate intervention within the streetscape at this location, which would negatively alter the external appearance, proportions and architectural detailing of the structure itself which would undermine the established character and visual coherence of the streetscape and the visual harmony of the terrace of properties in which it is located. The proposal would therefore adversely affect the character of the architectural conservation area and would be contrary to the 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

Derek Daly
Planning Inspector

6th August 2026

Form 1 - EIA Pre-Screening

Case Reference	PL 501367-CE-26
Proposed Development Summary	The application of an external render to the front (south-west) and rear (north-east) facades of the existing two storey dwelling.
Development Address	4 Riverview Terrace, New Road Ennistymon, County Clare.
1. Does the proposed development come within the definition of a 'project' for the purposes of EIA?	☐ X No , it is a 'Project'. Proceed to Q2.
2. Is the proposed development of a CLASS specified in <u>Part 1</u>, Schedule 5 of the Planning and Development Regulations 2001 (as amended)?	
☐ , it is a Class specified in Part 1 .	No
☐ X No ,	
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?	
x No , the development is not of a Class Specified in Part 2, Schedule 5 or a prescribed type of proposed road development under Article 8 of the Roads Regulations, 1994. No Screening required.	
No , the proposed development is of a Class and meets/exceeds the threshold.	
No , the proposed development is of a Class but is sub-threshold. Preliminary examination required. (Form 2)	

No	
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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 ☐	Screening Determination required (Complete Form 3)
Yes X ☒	Pre-screening determination conclusion remains as above (Q1 to Q3)

Inspector: Derek Daly Date: 6th August 2026