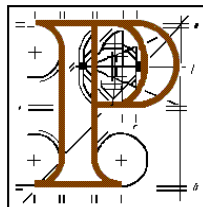


An Bord Pleanála



Inspector's Report

Referral Question: Whether the provision of laundry services as a minor part of the established range of integrated services offered on site is or is not exempted development.

Site Address: James O'Keeffe Memorial Centre, Newmarket, Co. Cork

Referral to Planning Authority

Planning Authority: Cork County Council

PA Reg. Ref.: D/295/15

Referrer: IRD Duhallow

Owner/Occupier: IRD Duhallow

Case type: Referral on Exempted Development under Section 5(1) of the PDA2000 (as amended)

PA Decision: Is development and is exempted development.

Referral to Board

Referrer: IRD Duhallow

Case type: Referral on Exempted Development under Section 5(3) of the PDA2000 (as amended)

Observers: None

Date of Site Inspection: 22nd July 2016

Inspector: G. Ryan

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1.0 SITE

- 1.1 The subject site consists of a period building and attendant outbuildings and grounds at the edge of Newmarket, a small town in North County Cork. There are two access routes to the site, from the north and west, which effectively form a through route.
- 1.2 The 6", 25", and Cassini 6" mapping for the area shows this property as 'Newmarket House' then 'Newmarket Court', and then 'St. Joseph's Convent'. It is clear that this was formerly the 'big house' for the town. The National Inventory of Architectural Heritage¹ dates the house to 1720-1730, and rates it as being of regional significance.
- 1.3 The main house, original outbuildings, and ancillary buildings of more recent construction, all appear to be occupied by IRD Duhallow, a rural development agency, and is in operation as the James O'Keeffe Memorial Centre. There are a notably wide range of activities on site including adult education, furniture repair, administration, meals on wheels/restaurant, gardening, the subject laundry, and so on. A number of subsidiary or related entities appear to be housed within the complex, and while the relationship between these entities is not clear from my site inspection, it is evident that all could reasonably be considered as falling within the broad remit of community development and education.
- 1.4 In part of the basement of the main house, there is a room that is in use as a laundry, with washing machines and driers of a commercial/industrial standard (at least four of each), as well as more domestic scale ironing boards and irons. Ducting from the laundry exits the building via a window to the yard outside, with one duct entering plant (possibly a condenser unit), and a second duct terminating at a point around the corner, a distance of about 10m. This duct is positioned between basement and ground floor level, tacked to the outer elevation. There is a 'reception' area within one of the other basement rooms.
- 1.5 A larger (and older) vertical duct is located a short distance away and extends up the building to above eaves level. I would imagine that this is part of the heating system. The area within which the subject plant is located is in a sunken yard to the south of the main building, and there are no views into this area from outside the yard. In contrast, the north and east elevations of the building enjoy views across the attendant grounds and surrounding countryside. The expression of the various elevations reflect these different roles, both as originally intended, and as reflected in the building's current incarnation.

¹ <http://www.buildingsofireland.ie/niah/search.jsp?type=record&county=CO®no=20819009>

2.0 REFERRAL QUESTION

2.1 REFERRAL TO THE BOARD

2.1.1 A report by McCutcheon Halley Walsh planning consultants on behalf of the referrer makes the following point of note.

2.1.2 Overview

2.1.3 The upgrading of the extractor system could be considered to be exempt under Section 4(1)(h) and Section 57(1) of the 2000 Planning and Development Act (as amended) as it did not have a material impact on the character of the protected structure.

2.1.4 The laundry service is an ancillary use of the permitted use of the premises as a training centre which provides community services.

2.1.5 The report also asserts that the planning authority's decision was contrary to previous advice, and that the planning authority did not take due cognisance of precedent cases.

2.1.6 Works to protected structure

2.1.7 The conservation officer's email of 15/03/2016 is based on photographs of works to the building. However, close-up photographs do not form an adequate basis for assessing the wider impact on the character of the protected structure.

2.1.8 There has not been a perceptible and irreversible loss of building fabric. The ducting has been routed through a window pane and is lightly pinned to the external wall. There has been no loss of building fabric, and any interventions are entirely reversible.

2.1.9 The semi-basement area where the extraction system is visible does not contribute to the special interest of the house. Historically, this area has always been a service area associated with the main house. Appendix 4 of the submission includes photographs to this effect.

2.1.10 Ancillary nature of laundry use

2.1.11 One of the tests of materiality is whether the laundry use is a minor or ancillary part of the permitted use of the premises as a training centre. Most of the people working in the laundry are on an occupational training programme.

2.1.12 Appendix 2 to the appeal consists of a briefing note on the relationship between the IRD Training Programme and the laundry [and catering] services. There is information on the Tús community employment schemes that are run in the centre.

- 2.1.13 There is no reference to any material change of use in the wording of the declaration. The planning authority appear to rely on the assumption that the laundry use is a standalone use.
- 2.1.14 The planning officer's report makes reference to impacts on the Blackwater River SAC and on traffic [with regard to restrictions on exemption in the legislation]. The referrer refutes these claims.
- 2.1.15 Appendix 3 consists of a list of precedent cases [see Section 6.4 below] considered relevant by the referrer, along with a summary of the issues raised.

2.2 AS PUT TO THE PLANNING AUTHORITY IN THE FIRST INSTANCE

- 2.2.1 The submission to the planning authority under PA Ref. D/295/15 was also made by McCutcheon Halley Walsh on behalf of IRD Duhallow, and covers much the same ground as the submission to the board summarised above. Other points of note can be summarised as follows.
- 2.2.2 IRD Duhallow was established in 1989 and combines the efforts and resources of State Bodies, Local Authorities, Local Communities, and individual entrepreneurs for the benefit of a local catchment which includes northwest Cork and southeast Kerry. Most of the funding has come from EU LEADER programmes, from national government through the Area Development Programme, and from FÁS. The range of activities delivered will vary over time depending on economic, social, and political priorities, the emerging needs of the communities within the catchment, and the type of services for which funding becomes available.
- 2.2.3 On the question of the 'commercialisation' of the laundry, it is not surprising that agencies such as IRD Duhallow might seek to recoup some element of the cost of delivering a service where possible. There is also the consideration that some clients who avail of a voluntary service are willing, and may actually prefer, to make a contribution. The Retail Planning Guidelines (2012) state that the planning system should not be used to inhibit competition, preserve existing commercial interests, or prevent innovation.
- 2.2.4 The submission raised the legal case of Cork Institute of Technology –v- An Bord Pleanála [2013], which related to development contributions, whereby the judge found that revenue raising activities can exist alongside educational or not-for-profit activities without undermining the main task of the institute, namely education and research.

3.0 SUMMARY OF REPORTS TO THE PLANNING AUTHORITY

3.1 PLANNING OFFICER'S FIRST REPORT

3.1.1 'Essential Character'

3.1.2 The planning officer addresses the 'essential character' question set out in the McMahon case [see Section 9.0 below].

3.1.3 He notes an advertisement on site that outlines the Community Laundry's target groups. He also notes the definition of 'shop' in the 2001 Planning Regulations.

3.1.4 The planning officer concludes that a voluntary laundry service would not appear to form part of any permitted development at this location, and is outside the scope of the parent permission. As such it is 'de exempted' Under Article 9 of the 2001 Planning Regulations by virtue of being inconsistent with a use specified in a permission.

3.1.5 It is not clear whether the laundry forms part of a training scheme. Further information should be sought in this regard.

3.1.6 The planning officer concludes that the raising of revenue from some of the services provided would necessarily involve a material change of use from a planning perspective.

3.1.7 Impact on environment

3.1.8 The planning officer address the 'impact on environment' question set out in the Lackagh Rock Case [see Section 9.0 below].

3.1.9 Traffic produced would be a small proportion of overall traffic

3.1.10 The site is within a screening zone for an SAC, and Article 9(1)(viiB) of the regulations is noted. No screening report has been submitted. It is not clear what additional effects the service would have on the environment.

3.1.11 Recommendation

3.1.12 The report notes that the planning officer is awaiting comments from the Conservation Office

3.1.13 The planning officer recommends requesting further information on 4 points (see Section 4.0 below).

3.2 CONSERVATION OFFICER'S REPORT

3.2.1 Post-dating the planning officer's first report, an email on file refers to a previous email (September 2014) which stated that the laundry

would not be an issue from a protected structure perspective if there are no changes/alterations to the building fabric.

- 3.2.2 On the basis of pictures provided of the very extensive pipework and extractor systems that have been adhered to and broken through the rear elevation of the building, the applicants did in fact alter the fabric of the building. These works to materially alter the character of the structure and would therefore not be considered exempted development under Section 57. These works are clearly not a simple changeover or upgrading of washing machines, but a far more substantial building project.

3.3 PLANNING OFFICER'S SECOND REPORT

- 3.3.1 This report post-dates the receipt of the further information discussed at Section 4.0 below.

3.3.2 Works

- 3.3.3 Having regard to the conservation officer's report, it is considered that the works do materially affect the external appearance of the structure so as to render the appearance inconsistent with the character of the structure. As such, the works and development would not be considered exempted development.

3.3.4 Use

- 3.3.5 On the issue of use, it remains unclear as to how the laundry functionally ties in to the existing and permitted facility on site. There is no scope under the act to seek further clarification on the matter. On the basis of the available information it is considered that the operation of the existing laundry service is development and is not exempted development.

4.0 FURTHER INFORMATION

- 4.1.1 On foot of the planning officer's recommendation, the planning authority requested further information on 4 points which can be summarised as follows, along with the response from the applicant

PA Request	Referrer's response
1. Outline if PA Ref. 82/3341 was fully implemented	In the opinion of the referrer's agent, the permission was implemented to the extent required under Section 40(1) of the Planning and Development Act.

<p>2. Outline if and how the laundry facility and service functionally ties in to the existing and permitted facility on site.</p>	<p>The laundry is one of a number of social inclusion programmes including home insulation, hot meals, and a range of support groups, training, and information. It was set up in response to request from two of the IRD working groups. The basement area has always been used as the working area of Newmarket House.</p>
<p>3. Outline the business plan and projected revenue streams for the laundry service.</p>	<p>The submission gives a broad overview to this effect.</p>
<p>4. Outline operating days and hours for the laundry.</p>	<p>9.00am to 5.30pm Monday to Friday, and occasionally at weekends if demand arises.</p>

Table 1

5.0 PLANNING AUTHORITY DECISION

Having Regard to the works and development carried out at this location, and Section 4(1)(h) of the Planning and Development Regulations 2001, as amended, relevant case law and the existing and permitted development onsite, the Planning Authority considers that the works and development carried out at this location are development and are not exempted development.

Having regard to Sections 3 and 4 of the Planning and Development Act 2000, as amended, Articles 9 and 10 of the Planning and Development Regulations 2001, as amended, relevant case law, and existing and permitted development onsite, the Planning Authority, on the basis of the information submitted to date, is not satisfied that the existing use and operation of the laundry facility and service onsite, is development and is exempted development, accordingly the Planning Authority considers that the existing use and operation of the laundry facility and service onsite is development and is not exempted development.

6.0 HISTORY

6.1 PARENT PERMISSION AND PREVIOUS PERMISSIONS ON SITE

PA Ref. 3341/82 Permission granted to refurbish the former St. Joseph's Convent for use as an agricultural training centre. This case is available in a pouch on the appeal file.

PA Ref. 2505/93 Permission granted for caravan and camping facilities [this scheme did not appear to have been extant at the time of my site inspection].

PA Ref. 11/6373 Permission granted for renovations and reconstruction of existing out buildings consisting of two separate rooms to be use solely for the storage of lawnmowers, garden tools, and surplus furniture.

PA Ref. 13/04860 Permission granted for a cooking facility.

6.2 ENFORCEMENT CASE

EF/15/042 Alleged unauthorised operation of a laundry business.

EF/15/159 Alleged unauthorised operation of a restaurant.

Warning letters were issued to the referrer by Cork County Council on 3rd March and 5th August 2015.

6.3 OTHER REFERRAL CASES ON THIS SITE

PL04.RL3475 Whether the provision of catering services by IRD Duhallow, is or is not development, or is or is not exempted development. This referral was deemed invalid

PL04.RL3498 Whether the provision of catering services by IRD Duhallow, is or is not development, or is or is not exempted development. This referral is currently before the board for consideration.

6.4 SIMILAR REFERRAL CASES

The following cases are cited by the referrer in Appendix 3 of their submission to the board, and cover both 'works' and 'use' scenarios. In all instances there was a 'favourable' outcome for the owner /occupier.

Case ref.	Location	Premises	Works/ use in question	ABP decision Dev't?	ABP decision Exempt?
RL2402	Cathedral St. Cork	Chinese Takeaway	Extract system	yes	yes
RL2558	Swift's Alley, D8	Drop-in centre	C.O.U. pub to community services.	no	n/a
RL2659	Ranelagh, D6	Period residence	Exterior and Interior Alterations	yes	yes
RL3155	Salthill, Galway	Amusements	Food to customers	no	n/a
			Extractor vent	yes	yes

Table 2

7.0 POLICY

7.1 CORK COUNTY COUNCIL DEVELOPMENT PLAN 2014

The subject building is a protected structure under the County Development Plan – Reference No. RPS 162.

The policies of the county plan are otherwise not relevant to the circumstances and applicable legislation in this case.

8.0 LEGISLATION

8.1.1 The following excerpts from planning legislation are relevant to his referral.

8.2 2000 PLANNING AND DEVELOPMENT ACT (AS AMENDED)

S.2(1) *“works” includes any act or operation of construction, excavation, demolition, extension, alteration, repair or renewal...*

S.3(1) *In the Act “development” means, except where the context otherwise requires, the carrying out of any works on, in, over or under land or the making of any material change in the use of any structures or other land.*

S.4(1) *The following shall be exempted development for the purposes of the Act*

(h) *development consisting of the carrying out of works for the maintenance, improvement or other alteration of any structure, being works which affect only the interior of the structure or which do not materially affect the external appearance of the structure so as to render the appearance inconsistent with the character of the structure or of neighbouring structures;*

S.4(2)(a) *The Minister may by regulations provide for any class of development to be exempted development for the purposes of this Act...*

S.4 (4) *Notwithstanding paragraphs (a), (i), (ia) and (l) of subsection (1) and any regulations under subsection (2), development shall not be exempted development if an environmental impact assessment or*

an appropriate assessment of the development is required.

- S.57(1) *Notwithstanding section 4(1)(a), (h), (i), F135[(ia)] (j), (k), or (l) and any regulations made under section 4(2), the carrying out of works to a protected structure, or a proposed protected structure, shall be exempted development only if those works would not materially affect the character of—*
- (a) *the structure, or*
 - (b) *any element of the structure which contributes to its special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest.*

8.3 2001 PLANNING AND DEVELOPMENT REGULATIONS (AS AMENDED)

A.5(1) *In this Part—*

...

‘shop’ means a structure used for any or all of the following purposes, where the sale, display or service is principally to visiting members of the public –

...

(h) as a launderette or dry cleaners,

- A.10(1) *Development which consists of a change of use within any of the classes of use specified in Part 4 of Schedule 2, shall be exempted development for the purposes of the Act provided that the development, if carried out would not*
- (a) *involve the carrying out of any works other than those that are exempted development*
 - (b) *contravene a condition attached to a permission under the Act*
 - (c) *be inconsistent with any use specified or included in such a permission or*
 - (d) *be a development where the existing use is an unauthorised use save where such change of use consists of the resumption of a use which is not authorised and has not been abandoned*
- A.10(2)(a) *A use which is ordinarily incidental to any use specified in Part 4 of Schedule 2 is not excluded from that use as an incident thereto merely by reason of its being specified in that part of the said schedule as a separate use.*

The following use classes from Schedule 2 Part 4 (Article 10 above refers) are of relevance:

CLASS 1

Use as a shop.

CLASS 2

Use for the provision of—

- (a) financial services,*
- (b) professional services (other than health or medical services),*
- (c) any other services (including use as a betting office), where the services are provided principally to visiting members of the public.*

CLASS 9

Use—

- (a) for the provision of residential accommodation and care to people in need of care (but not the use of a house for that purpose),*
- (b) as a hospital or nursing home,*
- (c) as a residential school, residential college or residential training centre.*

CLASS 10

Use as—

- (a) an art gallery (but not for the sale or hire of works of art),*
- (b) a museum,*
- (c) a public library or public reading room,*
- (d) a public hall,*
- (e) an exhibition hall,*
- (f) a social centre, community centre or non-residential club, but not as a dance hall or concert hall.*

9.0 CASE LAW

In the case of **Galway County Council v. Lackagh Rock** Justice Barron held

that it was not sufficient for the council to establish an intensification of use had taken place. It had to prove that the intensification of activity amounted to a change of use which was material i.e. had given rise to fresh planning considerations.

To test whether or not the use are materially different it seems to me that what should be looked at are the matters which the planning authority would take into account in the event of a planning application being made either for the use on the appointed day or for the present use. If they are materially different, then the nature of use must be equally materially different.

In the case of **McMahon v. Dublin Corporation**, Justice Barron investigated the question of whether the “essential character” of the use had changed, and the court concluded that a house that is occupied by the same family for several years has a different “essential character” to a house that is rented out to rugby fans for an international weekend.

10.0 OBSERVERS AND RESPONSES

10.1.1 No valid 3rd party observations to the referral were received by the board.

10.1.2 The planning authority did not respond to the issues raised in the referral to the board.

11.0 ASSESSMENT

Having inspected the site and reviewed the file documents, I consider that the issues raised by this appeal can be assessed under the following broad headings:

- Whether the extract/ducting works are development
- Whether the extract/ducting works are exempted development
- Whether the change of use from agricultural training centre to laundry is development
- Restrictions on exemption due to AA requirements

11.1 WHETHER THE EXTRACT/DUCTING WORKS ARE DEVELOPMENT

11.1.1 S.3(1) of the act defines “*development*” as “... *the carrying out of any **works** on, in, over or under land or the making of any material change in the use of any structures or other land.*” And defines “*works*” as including “*any act or operation of construction, excavation, demolition, extension, **alteration, repair or renewal...***” (my emphasis)

11.1.2 The external plant and ducting are clearly, by this definition ‘works’, being an act of alteration, repair, or renewal, and are therefore ‘development’, in my opinion.

11.2 WHETHER THE EXTRACT/DUCTING WORKS ARE EXEMPTED DEVELOPMENT

11.2.1 Works, by default, require permission unless an exemption otherwise applies. In my opinion, the relevant exemption to consider is Section 4(1)(h) of the act, in conjunction with the protected structure – specifically Section 57(1) of the act, both of which extend an exemption to certain acts of ‘maintenance, improvement, or alteration’, which I consider reflects the subject proposal exactly. Both

sections are replicated in full in Section 8.2 above, but in the interests of clarity, the relevant ‘caveats’ are as follows.

- 4(1)(h) – the works would not materially affect the external appearance of the structure so as to render the appearance inconsistent with the character of the structure or of neighbouring structures.
- 57(1) - [in addition to the S4(1)(h) considerations] – the works would not materially affect any element of the structure which contributes to its special interest.

11.2.2 The facts of the case are that the ducting leaves the building via the upper pane of what would appear to be an original window opening of the protected structure. The plant is located in front and to one side of this window, with additional ducting affixed to a length of wall, at approximately head height, for around 10m or so. And the entirety of these works are in a sunken semi-basement area to the rear of the house that has the appearance of having always been a ‘service area’, a role that it fulfils to this day.

11.2.3 In my opinion, the protected structure derives its special interest from its architectural features, its siting and attendant grounds, its northern and eastern elevations, its internal fixtures and fittings, and a range of other period items and features within the building and its grounds. In my opinion, the integrity and expression of the basement level southern elevation does not contribute to the special interest of this protected structure, and the addition of plant and ducting in this location does not affect the building’s character to an extent that would trigger the caveats to the exemptions listed above.

11.2.4 I note that the Conservation Officer’s report/email, on which the planning officer appears to rely heavily, is based solely on photographs rather than a site visit. The CO’s characterisation of the works as having “*broken through the rear elevation of the building*” is in my opinion factually incorrect, or at the very least an overstating of the situation.

11.2.5 As such, in my opinion, the installation of plant and ducting to serve the laundry can reasonably avail of the exemptions under S4(1)(h) and S57(1).

11.3 WHETHER THE CHANGE OF USE FROM AGRICULTURAL TRAINING CENTRE TO LAUNDRY IS DEVELOPMENT

11.3.1 Section 3 of the act defines ‘development’ as including the “*making of any material change in the use of any structures or other land*”. In my opinion, the subject scenario does amount to a change of use, but the question arises as to whether it is material for planning purposes. Case law has presented some guidance on this matter (See Section 9.0 above)

11.3.2 'Essential Character' – McMahon

11.3.3 As pointed out by the referrer, and evident from my own site inspection, there is a very wide range and diversity of uses evident on site. In my opinion, in the context of training programmes, community gardens, meals on wheels, programme administration, furniture repair, and so on, a laundry service is by no means incongruous in terms of character. It is also notably small in a quantitative sense, given the floorspace in use.

11.3.4 The planning officer appears to put significant weight on the question of whether the activity is entirely charitable or whether it has a commercial aspect to it. As acknowledged by the judge in the case of Cork Institute of Technology –v- An Bord Pleanála, it is usual these days for educational, community, or voluntary bodies to incorporate some amount of commercial revenue within a diverse revenue stream. I do not consider this to be a critical determinant of the question at hand. On the basis of the information available, there is a diversity of 'input streams' to the laundry, from collection to 'drop in' customers, and a range of users, from the charitable to the commercial. In my opinion, this is consistent with both the ethos of the organisation and also, crucially, the character of the use on site.

11.3.5 'New planning issues / Environmental Impacts – Lackagh Rock

11.3.6 Similar considerations apply to the 'Lackagh Rock' test. In my opinion, the range of planning issues and potential environmental impacts arising from the activities on site without the laundry are, to all intents and purposes, identical.

11.3.7 Exemptions for change of use under the planning regulations

11.3.8 Were the change of use to be considered 'material' for planning purposes, the question would then arise as to whether exemptions would apply on foot of the 2001 Planning Regulations. However, in my opinion, this scenario does not apply, and due to the primacy of the principle legislation, there is no requirement to consider further the exemptions set out in Section 8.3 above. Any finding of fact in relation to the tests in the regulations are irrelevant. The legislation is however presented in Section 8.3 above, should the board disagree with my recommendation on the question of materiality of the change of use.

11.4 RESTRICTIONS ON EXEMPTION DUE TO AA REQUIREMENTS

11.4.1 One final restriction on exemption to consider is posed by Section 4(4) of the act (See Section 8.0 above). As per my screening exercise at Section 12.0 below, I consider that AA is not required, and that this restriction on exemption is not triggered.

12.0 SCREENING FOR APPROPRIATE ASSESSMENT

12.1.1 The nearest Natura 2000 site is the Blackwater River SAC, around 1km to the southeast. Given the minor nature of the proposed development, relating solely to a laundry use and extract plant, I do not consider that the proposed development would be likely to have any significant effects on the integrity of a European site having regard to its conservation objectives.

13.0 CONCLUSION AND RECOMMENDATION

13.1.1 I consider that the plant to the rear of the building is development, but is exempted development by virtue of coming under the terms of Section 4(1)(h) and Section 57(1) of the Act.

13.1.2 I do not consider that the change of use from the permitted use of Agricultural Training Centre to the use of part of the basement as a laundry is material for planning purposes. Therefore, it does not in my opinion constitute development.

13.1.3 I recommend an order as per the following.

DRAFT ORDER

WHEREAS questions have arisen as to whether:

- (i) the installation/upgrading of extractor plant and ducting to the rear of the building, and
- (ii) the change of use of part of the basement of the training centre to laundry use,

at James O'Keeffe Memorial Centre, Newmarket, Co. Cork is or is not development: and is or is not exempted development;

AND WHEREAS the said questions were referred to An Bord Pleanála by IRD Duhallow on the 26th day of April, 2016:

AND WHEREAS An Bord Pleanála, in considering this referral, had regard particularly to -

- (a) sections 2(1), 3(1), 4(1), 4(2), and 57(1) of the Planning and Development Act, 2000, as amended,

- (b) the submissions on file, and
- (c) relevant case law;

AND WHEREAS An Bord Pleanála has concluded that -

- (a) the extractor plant and ducting would not materially affect the external appearance of the structure so as to render the appearance inconsistent with the character of the structure or of neighbouring structures,
- (b) the extractor plant and ducting would not materially affect the character of the structure, or any element of the structure which contributes to its special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest, and
- (c) the change of use from agricultural training centre to laundry is a change of use, but not a material change of use for planning purposes;

NOW THEREFORE An Bord Pleanála, in exercise of the powers conferred on it by section 5 (3)(a) of the 2000 Act, hereby decides that the installation/upgrading of extractor plant and ducting to the rear of the building is development and is exempted development, and that the change of use from agricultural training centre to laundry is not development.

G. Ryan
Planning Inspector
28th September 2016