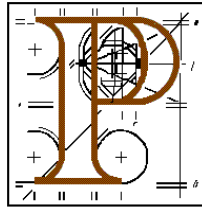


An Bord Pleanála



Inspector's Report

PL.07.243894.

DEVELOPMENT:- Demolish a two storey building and replace with a children's play area at Lidl Foodstore, Crowe Street, Gort, County Galway.

PLANNING APPLICATION

Planning Authority: Galway County Council

Planning Authority Reg. No: 14/406.

Applicant: Lidl Ireland GmbH.

Application Type: Permission.

Planning Authority Decision: Refusal of permission.

APPEAL

Appellant: Lidl Ireland GmbH

Type of Appeal: First Party.

Observers: John and Mary Counihan and others.

DATE OF SITE INSPECTION: 20th November 2014

Inspector: **Derek Daly**

1.0 SITE LOCATION AND DESCRIPTION.

- 1.1 The appeal site is located in the northwestern area of the town of Gort in County Galway at the junction of Crowe Street (N66) which defines the western boundary and Kinnincha Road which defines the site's northwestern boundary.

The appeal relates to a two storied building which adjoins the inner edge of the footpath immediately adjoining the Crowe Street frontage. The appeal site is part of an overall site on which there is a Lidl discount foodstore and associate parking. The Lidl store is located in the eastern area of the site and is set back from the road frontages. The overall Lidl site provides for car parking located to the north and west of the store and part of the parking area adjoins the appeal site. The vehicular access to the Lidl site is off Kinnincha Road. Kinnincha Road has a footpath on the southern side adjoining the Lidl site and no footpath on the northern side of this road.

Crowe Street/N66 is the main northern approach road to the town centre from the Galway Limerick M18 motorway/N18 National Primary Route. There is a public footpath on both sides of Crowe Street and double yellow lines are located at the junction of Crowe Street and Kinnincha Road along the eastern side of the Crowe Street.

2.0 PROPOSED DEVELOPMENT.

The proposed development as submitted to the planning authority on the 11th of April 2014 provided for the following,

- The demolition a two storey detached building 328m² in area and its replacement with a children's play area with a floor area of 291m².
- The play area is enclosed at the rear by a low wall 0.6m in height with a 1.1m high railing on top of the wall. There is provision for a railing type gate to access the play area.
- A planning cover letter was submitted indicating that the proposal includes further ancillary works with greater pedestrian accessibility and reduced vulnerability, which it is indicated are responses to issues arising in a previous proposal which was refused planning permission.
- Reference was also made to the inability to achieve any market interest in the existing building on the site.
- The inclusion of a low wall and topped by a railing is to add visibility and passive surveillance of the play area.
- Associated site works.

An architectural heritage appraisal report was as part of the application which assessed the contribution of the building to the architectural heritage of the area and the streetscape. The report concludes the building has no architectural merit and recommends the use of a 1400mm stone wall may be the appropriate means of defining the street line.

Further information was submitted on the 28th of July 2014. The details submitted included,

- A traffic report examining traffic in the area in particular at the existing junction between the N66 and Crowe Street.
- An assessment of the junction capacity.
- Observations on trip generation likely to arise from the proposed playground using a playground in Headford, County Galway as a comparison.
- The proposed development, the report concludes, would have a negligible impact on traffic generation in the area and could generate less traffic than the existing building on the site.
- The traffic movements are unlikely to occur in the manner considered by the planning authority in relation to dropping off children at the road junction.
- The only entrance to the playground is from within the parking area away from vehicular conflicting zones.
- In relation to boundary treatment a revised proposal was submitted to enhance the robustness of the boundary. The boundary is amended to provide for a wall 1080mm in height finished in local topped by stone a 720mm railing.

3.0 PLANNING HISTORY.

Planning history relating to the appeal site.

P.A. Ref. No. 13/385

Planning permission refused for a similar proposal on the appeal site.

ABP Ref. No. PL.07.238209/P.A. Ref. No. 10/1570.

Permission granted for an extension of 133.31m² to an existing licenced discount foodstore and relocation of existing car parking and ancillary site works subject to six conditions.

ABP Ref. No. PL.07.215925/P.A. Ref. No. 05/2911.

Permission granted for a licenced discount foodstore and also for the demolition of a storage building and alterations to a building to provide two retail units and two apartments overhead, 150 car parking spaces and ancillary site works subject to ten conditions

4.0 PLANNING AUTHORITY REPORTS.

The architectural conservation officer in a report indicates concerns in relation to transparent nature of the proposal in the context of the streetscape and the need for an alternative boundary treatment.

The roads and transportation unit report recommends refusal arising from extra conflict zones in the context of pedestrian and vehicular movements.

The planning report dated the 4th of June 2014 refers to LAP provisions; to the location within a possible flood plain but that there is a building currently on the site and also to objections received. Refusal was recommended for two reasons on traffic safety grounds and also the impact on the ACA and the streetscape.

The roads report and transportation unit report having considered the further information recommended refusal.

The architectural conservation officer dated the 27th of August 2014 indicates no objection to the revised boundary treatment.

The planning report dated the 27th of August 2014 recommended refusal.

5.0 PLANNING AUTHORITY'S DECISION.

The Planning Authority decided to refuse planning permission for the development. One reason for refusal was stated. The refusal refers to the additional traffic turning movements generated by the proposed development onto the heavily trafficked N66 adjacent to a busy junction where sightlines, footpaths, turning area and road widths are restricted. Reference is made to the users of the development as of a vulnerable nature.

6.0 APPEAL SUBMISSION.

6.1 FIRST PARTY APPEAL.

The appellant in the grounds of appeal states,

- The appellant rejects the Planning Authority's reason for refusal.
- The development is compliant with adopted available and applicable planning policy.
- The additional traffic generated will be minimal and will have a negligible impact on the N66/Crowe Street junction.
- This junction was the subject of a junction capacity assessment.
- The section of the N66 subject of this application has been relieved of a significant proportion of traffic and carries 53% of traffic that would have been expected in 2010 prior to the opening of the Ennis to Gort section of the M18.
- The N66 is not, therefore, a heavily trafficked route.
- Sightlines are in excess of the requirements set out in section 4.4.5 of DMURS with 65m x 2.4m visibility splays available which apply for a 60kph zone.
- The site is within a 50kph speed limit where sightline of 49 metres would be required to be provided.
- It is acknowledged that there is no footpath on the northern side of the access road however this is existing situation for all visitors to Lidl and

the adjoining residential area and the junction appears to function safely.

- Alternative design solutions were presented in relation to the junction and the absence of a footpath including the provision of a pedestrian crossing on the N66.
- A turning area is not and should not be provided at this junction and it is not considered that the development will generate drop off trips.
- Road widths are will within the range presented in DMURS.

7.0 OBSERVERS.

7.1 An observer submission from John and Mary Counihan and others dated the 12th of October 2014 indicates,

- The building is on a flood plain and there is a concern that any development may activate flooding in the area.
- There is a grave concern for safety as the site fronts onto the main entrance to the town and is at the junction for Lidl.
- Reference is made to the site being an attraction at night time for loitering.
- The streetscape is greatly compromised by the development.
- There is a new playground on the Ennis Road and the town does not warrant a second play area.
- Issues of impact on the ACA arising from the demolition of the existing building were considered and assessed and the demolition would not be detrimental to the ACA.
- There has been no market interest in the existing buildings on the site.
- The playground will provide a much needed and active use for the site.
- A suitable boundary treatment is proposed.
- In relation to flooding the proposed development will not be detrimental to flood risk.

8.0 POLICY.

8.1 County and Local Policy.

The current Development Plan is the Gort Local Area Plan 2013-2019.

The site is located within C1 Town Centre/Commercial. The site is also within an Architectural Conservation Area (ACA). In this regard the town has a medieval town core, which is the area along Crowe Street, Bridge Street, Georges Street and a number of occasional lanes perpendicular to the main street all of which converge on Market Square the main civic focus of the town and the ACA includes this core area.

There is also another zoning in the LAP, Zone CF, which relates specifically to Community Facilities.

In relation to the strategic vision for the town (section 2.1) this is informed by a number of guiding principles which include protecting and enhancing the heritage and character of Gort including the natural assets, environment, built heritage, public realm, local character and amenity, for the benefit of current and future generations.

Sections 3.7 and 3.8 refer to the townscape and the Architectural Conservation Area and the overall importance of the approach roads into the town and the special character of the historic core. In this context the indicates that “the designation of the historic town centre core as an ACA and the associated management of both individual buildings and the public realm in the area will significantly enhance the quality of the local environment within Gort”.

The following objectives and policies are of relevance.

Objective LU1 Town Centre/Commercial C1 which promotes the development of the Town Centre as an intensive, high quality, well-landscaped, human-scaled and accessible environment with an appropriate mix of uses, including residential, commercial, service, tourism, enterprise, public and community uses as appropriate, that provide a range of retail services, facilities and amenities to the local community and visitors to the town.

Objective LU6 which promotes the development of open spaces and recreational activities in accordance with best practice and on suitable lands with adequate access to the local community and retain existing open space and recreational facilities unless it can be demonstrated to the satisfaction of Galway County Council that these uses are no longer required by the community. The objective also seeks to ensure that any flood risk areas within the OS zone are appropriately managed to avoid, reduce and/or mitigate, as appropriate, the risk and potential impact of flooding.

Policy CF2 supports the provision of an adequate level and equitable distribution of community facilities and amenities in the Plan Area that:

- Meets the needs of the local community as they arise and resources permit.
- Are located in appropriate, accessible locations to serve the residential population in the Plan Area.
- Are clustered or linked together wherever facilities and amenities are complementary and it is practicable to do so, to allow for shared and multi-purpose use of facilities.

Objective TI 14 which supports the treatment of the route network within the built areas of the town as urban streets that prioritise the needs of pedestrians, that facilitate cyclists wherever possible and that support public and private transport movements, stopping and parking, as appropriate. In this regard, the principles, approaches, and standards set out in the *Design Manual for Urban Roads and Streets* 2013. New developments will be required to facilitate the extension of the urban street network and/or the

provision of improved connectivity and permeability, particularly for pedestrians and cyclists, where appropriate.

Policy BH1 in relation to Built Heritage supports the conservation of architectural and archaeological heritage, including the Protected Structures, Architectural Conservation Area and Recorded Monuments and Places and other important features of architectural or archaeological heritage within the Plan Area.

Objective BH3 relating to the Architectural Conservation Area where is an objective to protect conserve and enhance the essential character of the Architectural Conservation Area (ACA) through the appropriate management and control of the design, location and layout of new development, alterations or extensions to existing structures and/or modifications to the character or setting of the Architectural Conservation Area.

Objective BH5 where it is an objective to prohibit development proposals, either in whole or in part, for the demolition of protected structures or structures within an Architectural Conservation Area, save in exceptional circumstances.

Objective UD1 relating to High Quality, Context Sensitive Design where it is an objective to ensure that new developments are responsive to their site context and in keeping with the character, amenity, heritage, environment and landscape of the area.

Objective UD5 relating to Street-Oriented Development and Responsive Frontages, where it is an objective to promote street-oriented development along the urban street network within the built areas of the town and along the approach routes to the town. This will include improved facilities for pedestrians, cyclists and public transport as appropriate and the promotion of high quality building or landscaping edges to these routes. Buildings and spaces it is indicated should be designed to provide a human scale along street frontages with the use of appropriate building heights and responsive ground floor treatments. Intensive, fine-grained developments will generally be encouraged to provide a diversity of building forms and public spaces.

Flood risk issues are identified as an important consideration in the preparation of the Local Area Plan. A large area within the LAP boundary is identified as within a flood zone and the site is within indicative flood zone A on maps 3A and 3B which is an area with high probability of flooding.

Objective LU10 relates to Flood Risk Areas and Land Use Zones and where it is an objective to ensure that any proposed development that may be compatible with the land use zoning objectives/matrix but which includes a use that is not appropriate to the flood zone and/or that may be vulnerable to flooding is subject to flood risk assessment, in accordance with *The Planning System and Flood Risk Management Guidelines for Planning Authorities 2009* and the relevant policies and objectives of the Plan.

8.2 National Policy and Guidance.

Ready Steady Play! A National Play Policy March 2004 Department of Children and Youth Affairs.

This publication outlines a policy for all aspects of play including children's playgrounds. The plan identifies a deficit in the provision of playgrounds throughout the country but there is no clear definitive guidance on preferred location other than references to neighbourhoods and quantum of population to be served by playgrounds. Examples of best practice would tend to refer to public amenity areas as the preferred location.

Flood Risk Management Guidelines for Planning Authorities 2009.

The guidelines require the planning system at national, regional and local levels to,

- Avoid development in areas at risk of flooding, particularly floodplains, unless there are proven wider sustainability grounds that justify appropriate development and where the flood risk can be reduced or managed to an acceptable level without increasing flood risk elsewhere;
- Adopt a sequential approach to flood risk management when assessing the location for new development based on avoidance, reduction and mitigation of flood risk;
- Incorporate flood risk assessment into the process of making decisions on planning applications and planning appeals;
- Avoid inappropriate development in areas at risk of flooding;
- Avoid new developments increasing flood risk elsewhere, including that which may arise from surface water run-off.

It is also indicated in section 1.8 that "in achieving the aims and objectives of the Guidelines, the key principles that should be adopted by regional and local authorities, developers and their agents should be to,

- Avoid the risk, where possible,
- Substitute less vulnerable uses, where avoidance is not possible, and
- Mitigate and manage the risk, where avoidance and substitution are not possible".

This position is reiterated in chapter 3 outlining Principles and Key Mechanisms and illustrated in figure 3.1 outlining the sequential approach principles in flood risk management. Chapter 5 on Flooding and Development Management in assessing applications for development requires the application of the sequential approach in aiming to avoid development in areas at risk of flooding and that planning applications will, where appropriate, need to be accompanied by a detailed flood risk assessment to be considered by planning authorities in determining applications.

9.0 ASSESSMENT.

9.1 The proposed development as submitted to the planning authority on the 11th of April 2014 provided for the following,

- The demolition a two storey detached building 328m² in area and its replacement with a children's play area with a floor area of 291m².
- The play area is enclosed at the rear by a low wall 0.6m in height with a 1.1m high railing on top pf the wall. There is provision for a railing type gate to access the play area.
- The inclusion of a low wall and topped by a railing is to add visibility and passive surveillance of the play area.
- Further information was submitted on the 28th of July 2014. The details submitted included,
- A traffic report examining traffic in the area and an assessment of the junction capacity.
- In relation to boundary treatment a revised proposal was submitted to enhance the robustness of the boundary. The boundary is amended to provide for a wall 1080mm in height finished in local topped by stone a 720mm railing.

The primary issues in relation to this appeal relate to policy / and considerations specific to the site.

9.2 DEVELOPMENT PLAN POLICY.

Zoning.

The site is within the C1 Town Centre/Commercial zoning. In the land use zoning matrix there is no specific reference to a children's play area. In the matrix within the category public, community and institutional uses, childcare facilities (crèche/nursery) and community facility are indicated as permitted uses. It is also indicated in the LAP that "where a use is proposed that is not listed in the matrix, development proposals will be assessed on their individual merits in accordance with the general guidance provided by the matrix and having regard to the nature of existing and proposed uses, to the general policies and zoning objective/s for the area in the Local Area Plan and to the principles of proper planning and sustainable development".

In principle, therefore, there is nothing necessarily to preclude permitting the proposed use/development in the C1 zoning and there are related community type uses which are permitted in this zoning.

The rationale for the proposed development as indicated by the applicant in submissions arises from an inability to establish an active use of the building which was retained and refurbished under the original planning permission granted to Lidl on the site and in order to retain an active use on the site the applicant considered that an active play area for children would promote an active use of town centre lands.

In relation to the issue of whether the site is an appropriate location for a playground, the site is at the edge of the town centre with a mix of uses including commercial uses and to the north and northwest of the site and of the town residential development predominates. It is not therefore within a strong residential area.

In this regard I would note the provisions of policy of the LAP which although supporting the provision of an adequate level and equitable distribution of community facilities and amenities in the Plan Area does refer to location in appropriate, accessible locations to serve the residential population in the Plan Area and also that be clustered or linked together wherever facilities and amenities are complementary and it is practicable.

There is no clear guidance nationally or locally in relation to location of playgrounds and therefore every site can be considered on its merits. Playgrounds are, however, generally associated with amenity open spaces. In this context the current proposed location as a standalone playground in and adjoining the car park of a licenced discount foodstore, in close proximity to a major road would not in many respects be, I consider, an appropriate location. In this context the proposal should demonstrate a more defined circumstance to warrant its location on the appeal site.

Built Heritage.

The site is also within an Architectural Conservation Area (ACA) which encompasses the central area of the town and the approach roads leading into the centre. The northern extent of the ACA extends to the junction of Crowe Street and Kinnincha Road. The historic centre and approach roads are considered in the LAP of importance in the overall context of the enhancement of the town in the context of urban design and the protection of the built heritage.

A proposal to demolish a building within an ACA and on the main approach to the town centre from the north must therefore be considered as to whether it is appropriate to do so and if the building is demolished is the ACA and streetscape/approach road thereby detracted from and diminished especially where the alternative design presented does not form or have a significant solid edge as an integral component of the new proposal and the street.

In this regard an architectural heritage appraisal report was as part of the application which assessed the contribution of the building to the architectural heritage of the area and the streetscape. The report concluded the building has no architectural merit and recommended that the use of a 1400mm stone wall may be the appropriate means of defining the street line. The proposal as initially submitted provided for a low wall 0.6m in height with a 1.1m high railing on top of the wall. This was amended by a revised proposal intended to enhance the robustness of the boundary and the boundary was amended to provide for a wall 1080mm in height finished in local topped by stone a 720mm railing.

The need for a solid wall as originally considered was not pursued given the nature of the proposed development as visibility into the site was considered more appropriate in the context of the proposed use. This is I consider a valid consideration.

I would however have concerns in relation to the demolition of the building on the site and the absence of a solid mass along the street frontage. Objective BH3 relating to the Architectural Conservation Area states as an objective to protect conserve and enhance the essential character of the Architectural Conservation Area through the appropriate management and control of the design, location and layout of new development. Objective BH5 is also of relevance in indicating that it is an objective to prohibit development proposals, either in whole or in part, for the demolition of protected structures or structures within an Architectural Conservation Area, save in exceptional circumstances.

Having considered the rationale as set out for the removal of the building on the site and also in the context that the proposed use, I consider, is not necessarily the most appropriate and optimum location for the proposed use, exceptional circumstances are not established to warrant consideration of the removal of the building in this particular case. The loss of the building is significant in the context of the streetscape and the setting on a major approach road to the town. I would accept that the building may not have individual architectural merit but it forms part of a group of buildings that forms part of a streetscape on the approach to the historic centre of the town. It is also noted that the refurbishment of the building on the site was carried out in a previous permission given its location within the ACA and the overall approach as set out in the LAP of wishing to retain the character and setting of the ACA.

The design response presented will not therefore I consider enhance retaining the character and setting of the ACA.

9.3 CONSIIDERATIONS SPECIFIC TO THE SITE.

Design and Layout.

Aside from the overall issue of heritage and urban design, the development provides for a children's playground with various items of play associated with grounds enclosed within a perimeter and secured area with a low wall overlain with a railing. There is provision for a gate along the northern boundary as indicated in elevation C on the submitted drawings and provision for access to the playground in accordance with Part M. I would have no objection to the layout as presented for the actual playground.

Traffic and pedestrian safety.

The planning authority refused planning permission for the development with reference to the issue of traffic hazard. The planning authority's reason for refusal in particular refers to the additional traffic turning movements generated by the proposed development onto the heavily trafficked N66 adjacent to a busy junction where sightlines, footpaths, turning area and road widths are restricted. Reference is made to the users of the development as of a vulnerable nature.

The concern relates to what the planning authority perceive as likely vehicular movement and behaviour arising from the development where, although there is parking provided to serve the development and there are pedestrian links from the parking area to the playground, vehicles will drop off pedestrians and children on the N66/Crowe Street and also at the junction rather than entering the car park given the shorter distance. Resulting from this there will be perceived extra conflict zones in relation to pedestrian and vehicular movements and additional concerns arise from some of these pedestrian movements involving children.

In the grounds of appeal the first party appellant contends that the additional traffic generated will be minimal and will have a negligible impact on the N66/Crowe Street junction and in this regard the junction was the subject of a junction capacity and safety assessment. It was indicated that arising from the opening of the M18 this section of the N66 has been relieved of a significant proportion of traffic and carries 53% of traffic that would have been expected in 2010 prior to the opening of the Ennis to Gort section of the M18. It is also indicated by the appellant that sightlines are in excess of the requirements set out in DMURS.

It is acknowledged that there is no footpath on the northern side of the access road, however, this is existing situation for all visitors to Lidl and the adjoining residential area. The junction appears to function safely and alternative design solutions were presented in relation to the junction and the absence of a footpath including the provision of a pedestrian crossing point on the N66. The appellant also indicated that a turning area is not and should not be provided at this junction and it is not considered that the development will generate drop off trips.

In considering this issue patrons availing of the playground travelling in a vehicle ideally will enter the Lidl car park, park in proximity to the playground and walk into the playground and this will eliminate any conflicting movements between pedestrians and vehicles. The planning authority concern rests on the basis that not all patrons availing of the playground travelling in a vehicle will enter the Lidl car park and a proportion of the vehicles will instead park on Crowe Street and the junction. This will give rise to a risk of unnecessary and dangerous turning on and in proximity to the junction and will in turn give rise to conflicting and potentially hazardous traffic and pedestrian movements.

I would accept the view of the applicant that with the construction of the M18 there has been a reduction of traffic on Crowe Street with the elimination of

through traffic but Crowe Street remains an important road in the overall network serving as the main approach road into the town from the north and also accommodating traffic coming off the motorway and entering the town.

Currently in relation to the N66 and the junction with Kinnincha Road there are double yellow lines along the eastern side of Crowe Street and also along a section of Kinnincha Road west of the junction and vehicles should not be stopping/parking at the kerb on or in proximity to the junction where the road is lined. Sightline visibility in both directions from Kinnincha Road onto Crowe Street is I consider satisfactory. Other than the absence of a footpath on the northern side of Kinnincha Road the road network in the area is served by public footpaths.

Pedestrians can approach the appeal site along both sides of Crowe Street from the north and south on public footpaths. There is, however, an absence of priority crossing points on the road network on a north south axis and east west axis and many pedestrians coming to the site from a wider area have to cross a busy road and junction.

I do however consider that a traffic management scheme can be put in place to address current deficiencies in relation to pedestrian priority. It is an objective in the plan, TI 14, to support the treatment of the route network within the built areas of the town as urban streets that prioritise the needs of pedestrians. The management scheme can address the provision of a footpath on the north side of Kinnincha Road at the junction; the provision of pedestrian crossing points on Kinnincha Road and on Crowe Street. The use of barriers at the junction can provide for pedestrian priority in a safe environment, regulate vehicular stopping at the junction and also remove any perceived advantage of a drop off on the N66 and at the junction rather than entering the car park.

A condition requiring the provision of such a scheme could be included in a grant of planning permission and a requirement that the applicant contribute to the implementation of such a scheme would be reasonable. Such a condition would I consider address the matters raised in the stated reason for refusal by the planning authority.

Flooding.

The site is located within an area designated as Flood Zone A in the LAP. The LAP has largely followed the guidance in relation to plan preparation outlined in the *Flood Risk Management Guidelines for Planning Authorities 2009*. The designation Flood Zone A follows the guidance as set out in identifying different areas and levels of risk associated with flooding.

As a consequence of this designation the site forms part of an area with a high risk of flooding and where new development is considered inappropriate. There is however recognition in the guidelines that avoidance of development is not always possible on a high risk site and that development may already

exist/occur on the site. In this regard the use of a sequential approach to flood risk management is outlined with assessment based on avoidance, reduction and mitigation of flood risk.

There is also an aim to substitute less vulnerable uses, where avoidance is not possible, and mitigate and manage the risk, where avoidance and substitution are not possible. In relation to the current proposal the current proposal is currently an area which is developed and has been for a long period of time. The proposed development offers an opportunity to reduce risk and not to increase risk as it will remove uses which could be considered a more vulnerable risk and will not add to flooding. The proposal complies with the measures outlined in the guidance and the development as proposed will not increase the extent and risk of flooding.

10.0 CONCLUSION AND RECOMMENDATION.

Having regard to the assessment above, I would therefore recommend that permission be refused.

11.0 REASONS AND CONSIDERATIONS.

Having regard to provisions as stated in the Gort Local Area Plan 2013-2019, to the location of the development within an Architectural Conservation Area which encompasses the central area of the town and the approach roads leading into the centre; to the policies and objectives stated in support of enhancing the Architectural Conservation Area and of the town in the context of urban design and the protection of the built heritage, it is considered that the demolition of the proposed building and the absence of a replacement and appropriate solid edge and mass would have an adverse impact on the existing streetscape and Architectural Conservation Area. It is also considered that the demolition of structures within an Architectural Conservation Area, save in exceptional circumstances has not been established and demonstrated. The proposed development would therefore be contrary to the proper planning and sustainable development of the area.

Derek Daly

3rd December 2014

Inspectorate.