An Bord Pleanála



Inspector's Report

PL 06F.246009

DEVELOPMENT: Permission is sought for change of use of

existing single storey building from Postal Sorting Office to Muslim Prayer, Cultural and Community centre, minor changes to internal layout and external elevations, partial demolition of existing storage shed and all associated site

works.

LOCATION: The Old 'An Post' Sorting Office, The Green,

Swords, Co. Dublin.

PLANNING APPLICATION

Planning Authority: Fingal County Council.

Planning Authority Reg. No: F15A/0474

Applicant: Tariq Salahuddin

Application Type: Permission

Planning Authority Decision: Grant

APPEAL

Appellant: Paul Mc Donald

Type of Appeal: Third Party

Observers: None

DATE OF SITE INSPECTION: 25 February 2016

INSPECTOR: Patricia Calleary

1.0 SITE AND DEVELOPMENT DETAILS

Site Location and Description

- 1.1 The appeal site, with a stated area of 0.11 Ha, is located in a built up predominately residential area, in Swords in north County Dublin. It contains a vacant commercial unit, the change of use which is the subject matter of this appeal. Access to the site is located c.60m along a 150m long laneway, known locally as 'The Green'. The laneway is c.3.8m wide, is unlit and without any footpaths. It is accessed from Rathbeale Road at a point where a 50kph speed limit applies. Rathbeale road forms part of a regional route (R125) and serves a shopping centre and a Lidl retail unit both located c.400m north east of the junction with the laneway. The site lies c.1.4 km west of the M1 motorway and c.3 km north of Dublin Airport.
- 1.2 The site is surrounded by a mix of detached and semi-detached houses in an urban setting. A commercial business, Fingal Glass centre, operates on a similar size site located immediately west of the appeal site. There are 4 houses located further West and a small group of single storey apartments located North, i.e. directly opposite this commercial glass building.
- 1.3 The appeal site is bounded by a black palisade fence to its front (northern) boundary, facing the laneway. The fencing is in a poor state of repair. The primary building located on site has a pitched sheeted roof and exposed blockwork finish. There is some hard surface available for parking laid out to the front of the building. There is also a single storey shed on site. The property has the impression of being vacant for some time and the external site areas are worn and somewhat overgrown.

Description of Proposed Development

- 1.4 Permission is sought to for a change of use from **Postal sorting office** to a **Muslim prayer**, **cultural and community centre**. Internal changes involve the conversion of a former sorting room to a prayer room with separate mens and ladies rooms adjacent. New sanitary arrangements and an administration area / office are proposed, all within the building footprint. There are minor elevational changes proposed, including the relocation of external doors and fitting of replacement hardwood doors and aluminium frames windows and new metal canopy above the prayer room entrance.
- 1.5 The proposal also includes the partial demolition of the external shed on site and placing 2 car spaces in its place. The remaining shed area will be used for storage and secure cycle storage. The development proposes 9 car parking spaces in total.
- 1.6 A letter from the applicant's agent indicates that the centre will be utilised to provide services for the local Muslim community. Daily and weekly prayer services are proposed to be provided as are Islam classes for children, lectures, special celebrations, cultural programmes and community activities

(Ramadam, Iftar, Eid, Aqiqah). The centre will also provide a library of cultural and religious books and information services.

1.7 The application states that the Muslim population in Swords is c.300 and that c.5-10 people currently meet for daily prayers for a 10-15 minute time period. On a Friday, prayers are said in congregation and that c.30-40 people come together for prayers for a 30-40 min time period. On 2 other days per year, Muslims gather to pray in congregation for Eid prayers that these are comparable to Friday prayers. It is stated that Muslims are encouraged to walk to prayer as part of their religious ethos.

2.0 PLANNING AUTHORITY DECISION

2.1 The Planning Authority issued a decision to **GRANT** Planning Permission for the development on 7 December 2015. Condition 2 states the permission if for a **temporary period of 2 years**. The reason for the temporary permission is stated as being to permit the Planning Authority to re-assess the situation after 2 years. The planning decision is subject to 14 conditions. I have summarised relevant conditions as follows:

Condition 2: 2 year approval period (reason detailed above)

Condition 3: Detailed Archaeological Assessment required to be submitted to DAHLG

Condition 4: Revised Entrance Drawing incorporating pedestrian entrance to be submitted to PA

Condition 5: Details of days of operation and opening hours

Condition 6: Limits use solely to prayer, cultural and community centre

Condition 7: No calling to prayer or amplified sound

Condition 14: Section 48(2)(c) Special Contribution of €2000 in respect of road markings and signage

3.0 PLANNING APPLICATION

3.1 The application was submitted to the planning authority on 15 October 2015.

3.2 Planning Officers Report

The planning officer's report can be summarised as follows:

- Sets out the nature of the development.
- Site is zoned Residential 'RS' Place of worship open for consideration
- A number of third party submissions were received; lists areas of concern to include overdevelopment, traffic hazard, inadequate parking, Health & Safety concerns and negative impact on community. States that these submissions have been taken into consideration in the assessment of the application.
- Considers the development in the context of the former use as a sorting office by An Post.

- It is appropriate to permit a change of use and suggests a temporary permission may be appropriate to allow time to monitor the impact of the development over this period.
- Car parking provision is acceptable.
- The development would constitute de-intensification of use.

The Planning officer recommends a **grant** of permission for 2 years having regard to the historical use of the site and the limited scale and nature of development proposed.

3.3 Inter-Departmental Reports

Transportation

Development acceptable subject to conditions regarding signage and road markings and recommends the attachment of a special contribution.

Recommends a 2 year **temporary grant of permission** to allow for further assessment of traffic impacts (if any) which may arise.

Planning and Strategic Infrastructure Department

No Objection (Surface Water).

Environmental Health Officer

Recommends adherence to the 'Guidelines of the Air Pollution and Noise Control Unit' regarding construction and demolition sites' while work is in progress - In the interest of public health and environment.

3.4 Prescribed Bodies

Irish Water
No Objection

Health & Safety Authority

No response

3.5 Third Party Submissions

There are a significant number of third party submissions on file. Many are submitted from residents in the area. The primary issues of concern raised include the following:

Traffic & Parking

- Laneway incapable of accommodating increase in traffic volume.
- Poor vehicular access with restricted visibility at junction of lane with Rathbeale road.
- Located close to a busy junction on a major regional route.
- Will result in increased traffic congestion on Rathbeale Road.
- Inadequate parking provision.

Residential Amenity

- Over development, intensification of use.
- Private status of laneway.
- Devaluation of properties.
- Disturbance to existing residents.
- Out of character with area.
- Noise pollution.

Health & Safety

- Restricted access for emergency vehicles.
- Laneway is unlit and very narrow.

Contrary to Development Plan

• Non-compliance with Development Plan land use zoning objectives.

Other:

A submission was also received from Fingal Glass Company which raised additional concerns:

- Compromise movement of commercial vehicles associated with the development.
- Emergency vehicles would not be able to access premises should any car [associated with the development] park in the lane.
- Cars cannot turn vehicles in the lane

4.0 PLANNING HISTORY

4.1 There is no record of any planning history associated with this appeal site recorded on Fingal's online Planning Register. Permission was granted for 12 new 2 storey houses on a nearby site at 31 Rathbeale road under Reg Ref. F14/0502 in June 2015.

5.0 POLICY CONTEXT

Local Planning Policy

- 5.1 The appeal site is governed by the policies and objectives contained within the *Fingal Development Plan, 2011-2017.* Under Section 7.6 (Community Infrastructure), The Fingal County Development Plan supports the expansion of services including places of workshops.
- 5.2 Within the plan, the site has a zoning objective 'RS' which seeks to 'provide for residential development and protect and improve residential amenity'. The stated vision is to 'Ensure that any new development in existing areas would have a minimal impact on and enhance existing residential amenity'. A place of worship/prayer centre is a category of use which is neither 'permitted' nor 'not permitted' under the 'RS' zoning.

- 5.3 Lands to the north-east on the opposite side of Rathbeale Road are zoned General Employment 'GE', 'provide opportunities for general enterprise and employment'. These lands contain a large pharmaceutical company.
- 5.4 The area within which the site is located is an area of archaeological potential.
- 5.5 Table T03b sets out a requirement of 1 parking space per 5 seats in a place of worship and Table T01 requires a minimum of I bicycle space per 20 persons.
- 5.6 The following objectives are relevant.

Community Infrastructure

Objective C102:

'Ensure that proposals do not have a detrimental effect on local amenity by way of traffic, parking, noise or loss of privacy of adjacent residents'.

Place of Worship

Objective C132:

'Facilitate the development of additional places of worship through the designation and/or zoning of lands for such community requirements and examine locating places of worship within shared community facilities.

Objective Cl33:

Require that new or enlarged places of worship be located in places where they do not create unacceptable traffic congestion or car parking difficulties nor cause a nuisance to existing residents or businesses.

5.7 In terms of road safety, the following are relevant.

Road Safety

In the design and/or improvement of roads and in the assessment of planning applications for new development, the safety of road users, including pedestrians, cyclists and motorists will be a primary consideration.

Objective TO63

Promote road safety measures in conjunction with the relevant stakeholders and avoid the creation of traffic hazards.

6.0 GROUNDS OF APPEAL

6.1 Third Party Appeal

A third party appeal was submitted on behalf of Paul McDonald of Fingal Glass Centre Ltd. by O'Neill Town Planning. The appellant operates this glass business immediately west of the appeal site. The grounds of the appeal may be summarised as follows.

Traffic

- Laneway very narrow and cars cannot pass. If there is a vehicle parked along the lane it would block passing traffic. Lane is single lane carriageway and has no footpaths.
- At a width of 3.7m, it is marginally above the requirements set out under Technical Guidance Document (Part B) which provides guidance regarding compliance with the Second Schedule to the Building Regulations.
- Appellant requires clear access along lane to operate 2 commercial vehicles.
- Fears emergency services would not be able to access his premises
- Small community on the lane could not absorb the busy activity without creating a traffic hazard.
- Exit leading from laneway to Rathbeale road is substandard, causing a traffic hazard; Visibility is c.10m to the East and 20m to the west is all that is available, well below the required 70-80m in both directions.
- Right hand turning very difficult since Lidl opened and additional traffic would add to the traffic hazard and may cause accidents.
- Width of lane which is less than 4m is less than the requirements set out in 'Design Manual for Urban Roads and Streets' where a requirement of 5-5.5m width is required.
- Considers that the figures for cars and car parking are understated in the application. States the appellants recently observed 70 persons from the Muslim community in Swords arrived to a venue in Applewood for Friday prayers and states that they arrived in 46 cars.

Car parking

• Considers the development requires 23 car parking spaces and that there is a shortfall of 16 car spaces in the proposed development.

Residential Amenity

- Welfare of residents and children would be put at risk as currently laneway used for recreational use.
- Development would result in intensification and therefore contrary to stated development plan vision to ensure new development would have a minimal impact on residential amenity.

Development Plan Provision

 Considers the development is contrary to the stated vision for 'RS' zoning.

- Considers the location for such a development would be more appropriate in an area zoned 'Cl' Community Infrastructure.
- Previous use was non-conforming. Nothing in the Fingal County Development Plan which encourages the continuation of such nonconforming uses.

Other

There are 3 letters from individual residents attached to the appeal also supporting the appeal and requesting the Board to overturn the planning decision. These letters raise many of the points detailed in the main appeal. Other additional points include the following:

- Potential for the numbers using the building to rise
- Individual access to rear of houses onto lane could be blocked
- Concerns regarding noise from the use of the building
- Concerns re cyclists and pedestrians when vehicles are reversing
- Proximate to a major T junction could cause traffic conflicts

The appellant states that in a recent planning application for a Prayer, Cultural and Community centre at Clongriffen, it was stated that the complex would cater for 3000 people during festivals and up to 550 for Friday prayers.

6.2 First Party Response to Grounds of Appeal

A response to the first party appeal was submitted by WCA Architects. The contents of the response are summarised under:

- Previous use was a 24 hour operation where 50 people were employed in postal sorting and delivery of a customer service.
- Re-use of the vacant building would successfully accommodate the functional needs of the local Muslim community.
- Would accord with the provisions of the Fingal County Development Plan and proper planning and sustainable development.
- Traffic generated by the development would not jeopardise road safety to an unacceptable degree.

6.3 Planning Authority Response to Grounds of Appeal

A response to the first party appeal was submitted by Fingal County Council. The contents of their response are summarised under:

• The PA clarifies that a place of worship is neither 'permitted' nor 'not permitted' under the 'RS' zoning and therefore must be considered in relation to its contribution to the policies and objectives of the development plan. The PA state their satisfaction that the proposal is in line with the land use zoning for the site.

- Satisfied in the context of the previous use as a sorting office that based on the information submitted, the current proposal represents a de-intensification of use.
- Considers the car parking provision on the site is satisfactory. Regard is had to the proximity the town and the availability of pubic transport and access by foot.
- Temporary planning permission was considered appropriate so as to provide an opportunity to monitor the development over a 2 year period.
- Requests the Board to attach condition 14 (special contribution of €2000 for road marking and signage)

6.4 **Observers**

None

7.0 ASSESSMENT

- 7.1 I have examined the documents on file, inspected the site and environs and considered relevant planning policy. The following assessment covers the points made in the appeal submission and also encapsulates my *de novo* consideration of the application. I consider that the key planning issues in the assessment of the merits of this appeal case are as follows:
 - 1. Traffic and Road Access
 - 2. Car Parking and drop off
 - 3. Principle of the Development and Residential Amenity
 - 4. Other Matters

I will deal with these issues as set out under the respective headings. Issue No.3 (Principle of Development) is related to residential amenity, which in turn is related to traffic and parking issues. Accordingly, I consider these 2 issues first. What is important to note at the outset, is that the appeal site is not a greenfield site, but one which is occupied by a vacant commercial building which was formerly used as a sorting office by An Post. It is against this context that I have assessed the current change of use proposal.

7.2 Traffic and Road Access

The issues of road safety and traffic hazard constitute what I consider to be the main planning considerations which arise in this appeal and I consider this issue first in my assessment. The appellants raise strong concern regarding the potential impact of traffic resulting from the proposed change of use. The applicants consider that road safety would not be an issue having regard to the former use whereby it is stated that 50 employees worked on a 24 hour basis.

It is clear from my site inspection that the available sight lines at the junction of the laneway with Rathbeale road are very restricted by existing boundaries and hedges. I noted a limited sight line of c.12m to the south east and 20m to the North West is achievable, well below the 70m minimum required for its speed limit of 50kph. Rathbeale road was well trafficked on the day of my inspection and traffic was moving at speeds akin to the permitted speed limit of 50km/hr.

I note the view expressed by the Transportation department which considered the existing sightlines are restricted and recognises that the existing boundaries are outside of the control of the applicant.

The laneway junction with Rathbeale road is located 20m south east of a busy junction between Rathbeale Road and Watery Lane. This junction is controlled by traffic lights. There is also a controlled pedestrian crossing between the lane access and this junction. I have serious concerns regarding the conflict which would be generated between cars exiting from a narrow concealed laneway and vehicular traffic travelling along a busy regional road proximate to a busy junction and pedestrian crossing. Turning right from the laneway is dangerous. It requires the knowledge and assistance of other road users to cross over the road at a point where oncoming cars will have travelled through a junction controlled by traffic lights.

A vehicle exiting from the laneway would have to have moved forward onto the line of the footpath to gain a clear view of oncoming traffic. I would also therefore have concerns regarding the conflict which would arise between pedestrians using the footpath and vehicles exiting from the lane onto the footpath line in order to move forward onto Rathbeale road. It would give rise to a traffic hazard and an obstruction to pedestrians.

The laneway itself is a historical laneway which has facilitated some infill development. It is narrow, unlit and has no footpaths or space to provide segregation for pedestrians. I accept it is a short length (c.60m) from the footpath on Rathbeale road to the entrance to the appeal site but along this stretch, 2 cars would not be able to pass and the lane would be shared by cars/vans, cyclists and pedestrians without any segregation for vulnerable road users, most notably, pedestrians.

I am very mindful of the previous stated use of the building and of the need to assess this application in that context rather than as a new development. Therefore I must consider whether of not the use will generate a traffic hazard which is greater or less than that of the previous use.

The applicants state the levels of use will be low, i.e. daily prayers (5-10 people for 10-15 minutes), weekly prayers Friday (30-40 people for 30-40 minutes) and occasional gatherings (numbers not stated). The applicants also state that the number of Muslims in the Swords area as being 300. However, the population statistics compiled by the CSO indicate that there are 500 Muslims in Swords based on the latest (2011) census figures. Also, it is important to note that there has been a sharp rise (51%) in the Muslim population in Ireland in the time period of 2016-2011.

In my opinion, it is relevant to consider the occupancy capacity for the building for the previous and proposed uses. A sorting office has an occupancy load factor of 7 and the proposed use as a Muslim Prayer, Cultural and Community centre would have an occupancy load factor of between 0.3-1.0¹. The spaces occupied by the main prayer room and adjoining mens and ladies rooms have a stated floor space of c.225 sq.m. Based on a conservative occupancy load factor of 1.0, this area has the capacity to accommodate c.225 people² in a seating or kneeling arrangement. The same 225 sg.m floor space would have potential to occupy 32 people³ when it was previously used as a sorting office for An Post. Therefore, I consider that the proposed use would constitute intensification of use because it is capable of accommodating a larger number of people.

I consider it is relevant to take a long term view of the capacity of the building the assessment of the application. Based on the occupancy figures arrived at above, the building clearly has potential to accommodate a greater number of people in its stated proposed use or in a related use which could be accommodated under the same planning permission. It corresponds that it also has potential to generate an increase in traffic based on potential occupancy capacity.

There is no question in my mind but the intended use is one which has potential to give rise to greater trip generation and increased traffic volumes at the location into the future and this is a relevant consideration in the context of proper planning and sustainable development.

I am mindful of road safety for all users as being of primary consideration when assessing planning applications for new development. This is underpinned in the Fingal County Development plan as referenced in Section 5.6 of my report above. I consider that the proposed use would be contrary to the policy set out on Road Safety, in not seeking to avoid the creation of a greater traffic hazard. It would also be contrary to Objective TO63 in that it would not promote road safety. I note the Planning Authority's intention to attach a special contribution of €2000 to a grant of planning permission for signage and road markings. I do not consider that this solution would, in itself, be sufficient, given the physical constraints at the access and where fixed physical boundaries lie outside of the control of the applicant. I further note that the transportation department had concerns regarding the impacts which the development would have on traffic and recommended a temporary 2 year permission to give time to re-assess the impacts. However, I am of the opinion that this is not a preferred solution as it would put expense on the applicant in improving the building with no certainty as to its continued use beyond the 2 year period.

¹ Table 1.1 of Technical Guidance Document: B (2006) published by DEHLG provides occupancy factors including the following: (Open Plan office: 7; Standing area in assembly and recreation = 0.3 m² and dining room/ meeting room 1.0 m² per person). There is no occupancy load factor for a place of worship/prayer room and the guidance suggests that the closest value should be selected.

² 225m² (floor area) / by 1.0 occupancy factor = 225 persons for current use.

³ 225m² (floor area) / by 7.0 occupancy factor = 32 persons for previous sorting office use.

In conclusion, I consider that the change of use, if permitted would endanger public safety by reason of a traffic hazard. Accordingly, I consider that it would therefore be contrary to the principles of proper planning and facilitating the sustainable development of the area and should therefore be refused.

7.3 Car Parking Provision and drop-off

Car parking standards are set out in Table T03b of the Fingal County Development Plan. 'Church and other places of worship' require a maximum of 1 space per 5 seats. Based on 40 people attending Friday prayers and less attending daily prayers, the Planning Authority considered that there was sufficient car parking available on site.

However, as stated in Section 7.2 above and taking a long term view of the proposed change of use to a Prayer, Cultural and Community centre, the building clearly has potential to accommodate a greater number of people in a growing Muslim community or indeed a related use which could be accommodated under the same planning permission.

I note the applicant has stated that the Muslim community in Swords consists of 300. My research provides evidence that the Muslim population is 500, based on latest available data from the CSO 2011 census. This figure is likely to have increased since 2011 and into the future based on national trends. I consider that the evidence from the CSO figures together with potential for growth of use into the future suggest a greater number of car spaces would be required.

I agree with the appellants that 'the Green' and Rathbeale Roads are unsuitable for any overspill of car parking. I note that this issue can be somewhat mitigated against by provision of additional road markings and signage so as to not permit or encourage any such unauthorised car parking. The issue of dropping off would be more difficult to control and could lead to congestion along a narrow lane where 2 cars would have difficulty in turning and where there is no footpath to protect the safety of pedestrians. I note that the information on file indicates that the site is located close to public transport and that that there is a strong ethos to walk to prayer and I have taken those factors into account in my assessment.

I consider, nonetheless, that the proposal has insufficient parking and the issue of dropping off of patrons could lead to traffic congestion on the lane and in the vicinity of Rathbeale road at certain times of use. The lack of sufficient car parking and drop off facilities would have potential to create serious traffic congestion and conflicts with pedestrian users sharing the lane where there are no footpaths or lighting. Accordingly, I consider that the application should be refused on this issue also.

7.4 Principle of the Development and residential amenity

The site, which contains a vacant premises, is located within an area zoned 'RS' where such zoning objective seeks 'to provide for residential development and protect and improve residential amenity'. A place of worship/prayer centre does not specifically fall within this zoning category and

as such must be assessed on its contribution to the policies and objectives of the development plan. The vision statement, which seeks to ensure that any new development in existing areas should have a minimal impact on and enhance residential amenity, should also be considered.

The applicant asserts that the sorting office worked on a 24 hour basis with 50 employees and many deliveries were transported in and out of the building. In that context, the employment and associated traffic movements were spread out over the day and night and accordingly low trip generation would result at any one time. The proposed use has the potential to generate significant additional traffic at certain 'peak' times at Friday prayers and cultural events, having regard to the nature of the use where patrons would gather at the same time. The impact of cars arriving and dropping off patrons where there is insufficient drop-off, turning and parking facilities is one which has potential to give rise to a reduced residential amenity for the existing residential community currently using the laneway at a location where there are no footpaths or public lighting.

I conclude that the change of use from a postal sorting office (commercial) to a Muslim Prayer, Cultural and Community centre would **not** 'provide for residential development and protect and improve residential amenity'. Accordingly, given the potential negative impact it would have on the existing residential amenity, the proposed use should not be permitted.

7.5 **Other Matters**

Appropriate Assessment

The site is located c.1.5 km south west of the nearest Natura 2000 site, the Malahide Estuary SAC (Site Code 000205) / Broadmeadow/Swords Estuary SPA (Site Code 004025). Having regard to the nature and scale of the proposed development which seeks permission for a change of use to an existing building and to the nature of the receiving environment away from Natura 2000 sites or any pathways between the site and Natura 2000 sites, I am of the opinion that no appropriate assessment issues arise. It is not considered that the proposed development would be likely to have a significant effect, either individually or in combination with other plans or projects on a European site.

Alternative

I considered the attachment of a condition to limit the number of patrons who will use the facility as a way to mitigate against the planning issues of traffic hazard, lack of parking and drop off facilities and the resultant impact on residential amenity and road safety. Having considered this option, I am of the opinion that limiting the numbers would be unsustainable in the context of the building being under utilised as a result. It would also be undesirable as it could negatively serve to exclude some patrons from using the facility.

Furthermore, it would be difficult if not impossible to enforce. I did not therefore pursue this option.

8.0 CONCLUSIONS AND RECOMMENDATION

I have read the submissions on the file, visited the site, had due regard to the development plan and all other matters arising. I recommend that the proposed development be **refused** permission for the reasons and considerations set out hereunder.

REASONS AND CONSIDERATIONS

- 1. Having regard to the restricted visibility for vehicles exiting from the adjoining narrow laneway (known as 'The Green') onto the public road (Rathbeale Road) adjacent to a controlled junction and pedestrian crossing, it is considered that the additional traffic movements likely to be generated by the proposed development would have potential to endanger public safety by reason of a traffic hazard adjacent to a controlled junction, which in turn would lead to conflicts between vehicular traffic, pedestrian and cyclists. The proposal would contravene Road Safety **Objective T063** of the current Fingal County development plan, which seeks to ensure that road safety measures are promoted and that the creation of traffic hazards are avoided. Accordingly, the proposed development would be contrary to the proper planning and sustainable development of the area.
- 2. Car parking, turning and drop-off provisions are considered inadequate within a constrained area, to meet the future demand which would likely be generated by the proposed use, which in turn would have potential to create serious traffic congestion and conflicts with pedestrian users and neighbouring property owners sharing the adjoining laneway (The Green) where there are no footpaths or public lighting. The proposed development would have potential to reduce existing residential amenity and would therefore be contrary residential zoning **Objective** 'RS' of the current Fingal County development plan which seeks to provide for residential development and protect and improve residential amenity. The proposed development would therefore be contrary to the proper planning and sustainable development of the area.

Patricia Calleary Senior Planning Inspector 05 March 2016

APPENDIX: Site Location, Context Maps and Photographs