



An
Bord
Pleanála

F

Inspector's Report PL11.247143.

Development

1 No 500kW wind turbine with a hub height of 65 metres and an overall tip height of 93.5m, an electrical switch room and control facility, an access track, associated infrastructure including a crane hardstanding area, underground cabling and all ancillary site works.

Location

Knocklead, Timahoe, Co Laois.

Planning Authority

Laois County Council.

Planning Authority Reg. Ref.

15/401.

Applicant(s)

Andy Dunne.

Type of Application

Permission.

Planning Authority Decision

Refuse Permission

Type of Appeal

First Party v Refusal

Appellant(s)

Andy Dunne.

Observer(s)

None

Date of Site Inspection

7th November 2016 & 12th December
2016

Inspector

Bríd Maxwell

1.0 Site Location and Description

1.1. The appeal site has a stated area of 0.99 hectares and is located within the townland of Knocklead approximately 3km northwest of The Swan village and 5km south east of Timahoe in Co Laois. The site is located within an area of commercial forestry, part of a block of land of approximately 54.4 hectares planted circa 1994. The forest is in conventional management, has been thinned a number of times and has the benefit of well established forest road infrastructure. Access is via a local tertiary road approximately 150m from its junction with the Regional Road R426. The area is upland and rural with the dominant land uses being agriculture and forestry also with scattered rural dwellings. There is a derelict dwelling and associated outbuildings located circa 280m to the northwest of the site. The closest inhabited dwellings are circa 680 metres south of the turbine and 720m west of then turbine.

1.2. There are a number of Natura 2000 and other designated sites in the vicinity including:

- The River Barrow and River Nore - Clogh River 4.27km hydrological distance from the site. Owenbeg River 3.5km distant.
- Ballyprior Grassland SAC 7.6km to the north east.
- Lisbigney Bog SAC 12km to the southwest.
- Slieve Bloom Mountains SPA – 23km to the northwest.
- Timahoe Esker pNHA located circa 6km to the north east of the site.

2.0 Proposed Development

2.1. The application involves permission for a single wind turbine with a maximum hub height of sixty five metres, and rotor diameter of not more than 57m, an electrical switch room, an access track, associated infrastructure and all ancillary site works. The generator will have a maximum rated output of 500kw. Electricity generated will be connected to the grid by way of an underground cable to the existing 20kV overhead line which passes through the forest approximately 200m south of the appeal site.

- 2.2. Access is proposed by way of the existing forestry roadway with a new section of road (approximately 60m long) to be constructed from the end of the existing forest road to the turbine location. A single storey substation building 10m x 5m x 5m is proposed.
- 2.3. The land area required for the proposed development including the new access road is approximately 0.04 hectares Construction period is estimated to be 2 months in duration with a prediction of 50 HGV movements during the construction phase.

3.0 **Planning Authority Decision**

3.1. **Decision**

Ultimately and following an initial request for additional information detailed below, the Planning Authority decided to refuse permission for the following reasons:

1. Having regard to

- (a) The subject site's location within an area designated as an 'Area Open for Consideration' in Section 5 of Appendix 5: Wind Strategy 2011-17 of the Laois County Plan 2011-17;
- (b) Specific Area Policy WES 6 of Appendix 5L Wind Strategy 2011-17 of the Laois County Development Plan 2011-17 which states that 'Wind energy applications in these areas will be evaluated on a case by case basis subject to viable wind speeds, environmental resources and constraints and cumulative impacts' and
- (c) The absence of at least one years measured wind data from the subject site as required by 'Guidelines on Wind Farm Development Constraints in County Laois' contained within Appendix 5: Wind Strategy 2011-17 of the Laois County Development Plan 2011-17;

It is considered that the applicant has not submitted sufficient detail to demonstrate that the location of the proposed development is a suitable location for a wind turbine and that the proposed development would contravene the following policies of the Laois County Development Plan 2011-17;

- (i) ET9/P01 to facilitate energy infrastructure provision, including the development of renewable energy sources at suitable locations, so

as to provide for the further physical and economic development of County Laois; and

- (ii) ET9/P10 to encourage the development of wind energy, in accordance with Government Policy and having regard to the Landscape Characterisation Assessment of the County and the wind Energy Strategy for the County.

The proposed development would accordingly contravene the stated policies and the provisions of the County Development Plan and would therefore be contrary to the proper planning and sustainable development of the area.

2. Having regard to the:

- (a) Omission of a number of view shed reference points taken from a number of dwellings both existing and under construction within close proximity to the proposed development from the Visual Impact Assessment carried out as part of this application;
- (b) Absence of photomontages showing the appearance of the proposed turbine in the event that the surrounding forest area is felled or cleared into the future;
- (c) The absence of photomontages showing both rotor perpendicular and rotor facing view at the chosen Viewshed Reference points,
The Planning Authority is not satisfied that the proposed development will not seriously injure the amenities of residential properties and detract from the visual amenities of the area, and would therefore be contrary to the proper planning and sustainable development of the area.

3.2. Planning Authority Reports

- 3.2.1. Executive Scientist, Waste Enforcement Environment report notes location in an SAC area¹. Additional information required including an EIS /EIA. Insufficient

¹ As noted at section 1.2 above the site is not itself within an SAC. There are a number of SACs nearby the closest being the River Barrow and River Nore SAC 5.4km downstream, hydrological distance from the site.

information has been provided regarding the construction and demolition work to be carried out on site. Waste management details.

- 3.2.2 Roads report. If permission is to be granted the applicant to carry out a pavement structural evaluation comprising a falling weight deflectometer survey to 200m of the L38582 and distance of 600 mm along the R426. Details to inform design for strengthening of the junction. Remedial works to the bridges on the haulage route. Post construction inspection and provision for construction stage traffic management plan.
- 3.2.3 Executive Scientist, Waste Enforcement Environment report asserts that information is insufficient. EIS is required and additional details regarding waste management.
- 3.2.4 Initial planning report notes grant of permission PL11.242626 for 18 turbines east of Ballyroan Village southwest of Timahoe which was not taken into account in the application. NIS is inadequate on the basis of insufficient baseline data and inadequate cumulative assessment. Details of grid connection, felling impact, residual impact of proposed mitigation, impact of decommissioning phase, worst case scenario in the event of mitigation measures failing. Application fails to demonstrate economic viability. Further details required regarding source of materials, confirmation of whether blasting is proposed, noise monitoring of construction phase, haulage route, waste management. Applicant should also be invited to address issues raised in third party submissions.
- 3.2.5 Following the issue of a request for additional information seeking the items outlined in the planner's and other technical reports the final Planner's final report asserts that the viability of the site for wind farm development has not been demonstrated. Visual impact assessment is not comprehensive with particular reference to nearby dwellings. Refusal was recommended.

3.3 Prescribed Bodies

- 3.3.1 Inland Fisheries Ireland submission indicates no objection in principle. Notes reference within documentation to the design of foundation being based on future investigation of specific geo-technical criteria and reference to a requirement for wind monitoring mast on site. Development may be premature pending determination of wind power capabilities at the site.

3.3.2 Correspondence to the developer from the Department of Arts Heritage and the Gaealtacht² refers that the role of the Department as a prescribed body which is to provide observations and submissions to a planning authority on the implications of a proposed development for nature conservation. The role of the Planning Authority is to complete the required AA and EIA and to ensure the required standard of decision making is applied. In this role the Department may provide observations on the level of survey work undertaken if it is of the view that it may not be sufficient to indicate the full scope of the implications of the proposed development for nature conservation. However, the Department does not exhaustively review all documentation provided on every application referred to it by a competent authority or by an applicant, nor does it express approval of applicant's proposed methodologies and related aspects on their sufficiency for the AA or EIA processes, as the Department views this to be outside the scope of its role. It is for the applicant and their experts firstly to consider the methodologies, survey effort etc. that is required to understand and assess the implications for nature conservation that are particular to their own application and the sensitivities of nearby ecological receptors including, but not only European Sites. It is the competent authority that must ensure when concluding an AA and EIA that its decision meets the authority's obligations having regard for the law and the jurisprudence of the National and European courts. The information forwarded is adequate and conforms to what constitutes AA screening and NIS. The NPWS of the Department notes the overall finding of the NIS and has no further comment to make. As regards the likelihood of potential impacts on Natura 2000 sites and other ecological features and any specific mitigation measures the Department would prefer to be implemented the applicant is advised that any mitigation measure identified as necessary for the project to avoid adverse effects on the integrity of European sites are fully described and demonstrated to be effective in reducing those effects to non-significant levels have clear timelines and methods for their implementation and are assessed in the applicant's analysis to ensure that all mitigation across the project is coherent, consistent and will not give rise to effects on a European site in themselves. The applicant is advised to have regard to jurisprudence from the ECJ in this regard as

² I note that this correspondence responds to specific questions posed to the Department by the first party as directed within the further information request of the Local Authority.

well as current guidance from the department and the European commission in relation to Article 6(3) assessments and methodologies.

3.4 Third Party Observations

3.4.1 Multiple submissions from numerous local residents who object strongly to the development on a number of grounds which I have summarised as follows:

- Non-compliance with EIA Directive, European Landscape Convention, Aarhus convention, Development is not sustainable development.
- Proposal requires EIA and AA.
- Absence of non-technical summary represents an infringement of third party rights.
- Industrial scale of proposed turbine is inappropriate and a gateway to further development.
- Piecemeal haphazard development.
- Development premature pending strategic assessment in relation to proposed industrial windfarm developments.
- Proposal is not sustainable on economic social or environmental grounds.
- Wildlife survey inaccurate.
- Grid Connection details inadequate.
- Negative impact on local community arising from visual amenity impact, noise, impact on animal welfare, negative impact on tourism & film industry and health risk.
- Photomontage views are misleading and biased.
- Precautionary principle should apply.
- Misleading and biased information regarding property devaluation from USA and UK irrelevant to Irish Context.
- Cumulative assessment inadequate.

3.4.2 Submission from Sean Fleming TD supports local objectors to the development.

4.0 Planning History

4.1 There is no planning history on the appeal site however there are a number of recent and concurrent applications which are relevant in the consideration of the appeal case including:

- **PL11.242626 13/268** The Board granted permission attaching conditions for 18 wind turbines, internal access roads, 1 meteorological mast, substation compound, 6 parking spaces, widening of 2 entrances for temporary construction access on site east of Ballyroan Village/Southwest of Timahoe Village, Co. Laois. This followed a first party appeal of Laois County Council's decision to refuse permission. Referred to as Cullough project, this site is located 4.35km to the north-west of the site at its closest point.
- **14/139** Permission granted for two wind turbines tip height 156m at Graigueadrisly, Co. Laois. (Extension to the existing Bruckana wind farm in Co Tipperary and Co Kilkenny)
- **16/260** Concurrent application for permission for 11 turbines each with a maximum hub height up to 136.5m at Knockardugar, Boleybawn, Garrintaggart, Ironmills (Kilrush) and Graiguenahown, Co. Laois. Further information requested 21/7/2016.
- **16/93** Application for one turbine hub height 60m at Gorteenahilla, Cullahill. Co Laois. Further information requested on 7th September 2016.
- **11VA0015.** Laois Kilkenny Grid Reinforcement Project. An Eirgrid venture required to address forecast constraints on the existing transmission network in the Midlands region, South-East Region and County Kildare. The requirement for the project is twofold, namely to ensure security of supply and to improve quality of supply. It involves new electricity substations at Coolnabacca 2.6km north of Timahoe Village in Co Laois and at Moatpark 1.3km northwest of Ballyragget Co Kilkenny the addition of a new bay in the existing Kilkenny substation, upgrading of overhead power lines and construction of a new connection from the existing Moneypoint to Dunstown 400kV line and new connection to Coolnabacka substation from the existing Athy to Portlaoise 110kV line, new 110kV overhead line between Ballyragget and Coolnabacka.

5.0 Policy Context

5.1 Development Plan

5.1.1 The Laois County Development Plan 2011-2017 refers. The site is in an area designated as “open for consideration” in Appendix 5 “Wind Strategy” of the Laois County Development Plan 2011-2017 and is also designated as a Hill and Upland Area in Appendix 6 Landscape Character Assessment.

5.1.2 Section 9.4 of the County Development Plan deals with Renewable Energy. It is set out that “wind energy is regarded as the biggest potential contributor to the expansion of the renewable energy sector in the County”. The wind energy strategy strongly advocates a formal Plan led approach to wind energy development in the County, as recommended in national guidelines. In addition, it identifies those areas within the County (predominantly upland and worked-out peatland) that are eminently suitable for this form of energy production. Section 9.5 deals with electricity and Table 18 notes the power stations located in Laois. It is noted that the Plan makes reference to the proposed Eirgrid reinforcement project in the Laois-Kilkenny region by creating a new circuit between the 2 counties.

5.1.3 The Plan objectives for the County in relation to energy include:

- ET 9/P01 Facilitate energy infrastructure provision, including the development of renewable energy sources at suitable locations, so as to provide for the further physical and economic development of County Laois.
- ET 9/P02 To raise awareness within communities of the need to reverse fossil fuel dependency, to mitigate the effects of peak oil and economic contraction, and drastically reduce carbon emissions, to mitigate the effects of climate change.
- ET 9/P04 Encourage the production of energy from renewable sources, including in particular from wind, waste material, solar, hydro and biomass energy, subject to normal proper planning considerations, including in particular the potential impact on areas of environmental or landscape sensitivity.

- ET 9/ P10 Encourage the development of wind energy, in accordance with Government policy and having regard to the Landscape Characterisation Assessment of the County and the Wind Energy Strategy for the County.
- ET 9 /P11 Ensure that the assessment of wind energy development proposals will have regard to the impacts on public rights of way and walking routes.
- ET 9 / P18 Protect areas of recognised landscape importance and significant landscape views from construction of large scale visually intrusive energy transmission infrastructure. In such circumstances, it is an objective to seek alternative routing or transmission methods.

5.1.4 Within Appendix 5 Landscape Strategy, Section 7 sets out Guidelines on Wind Farm Development Constraints in County Laois it is outlined as follows:

“An adequate wind resource is the primary constraint in developing a wind farm. As mentioned above some indication of the likely wind speeds can be extracted from the Irish Wind Atlas. However, at least one year’s measured data is required before a project can be developed. This will entail erecting a 40m or 50m wind monitoring mast within the site and recording data for a minimum of 12 months. Planning permission, usually for 2 years is required for this mast.

5.1.5 Section 12.5.1 deals with the Water Framework Directive. Reference is made to the Nore Freshwater Pearl Mussel which is found in the River Nore in Laois. The species is unique to the River Nore and is not found anywhere else in the world. It has been critically endangered for some time. The quality of its habitat is falling (evidence of heavy siltation, macrophyte and filamentous green algal growth) and its population demographic profile is weak (insufficient number of juveniles present to provide sustainable replacement of current adults). A sub-management plan for the Nore freshwater pearl mussel is being prepared, which indicates the sensitivity of the species and includes environmental objectives.

- Policy ENV 12 / P07 Ensure that developments that may adversely affect water quality will not proceed unless mitigatory measures are employed, such as settlement ponds, interceptors etc.

It is the policy of the Council NH 13/P25 to protect the Nore Pearl Mussel through the measures set out in the Freshwater Pearl Mussel Nore sub-Basin Management Plan (2009).

5.2 Natural Heritage Designations

There are a number of Natura 2000 sites in proximity to the appeal site including:

- The River Barrow and River Nore - Clogh River 4.27km hydrological distance from the site. Owenbeg River 3.5km distant. Fushoge River 11.km
- Ballyprior Grassland SAC 7.6km to the north east.
- Lisbigney Bog SAC 12km to the southwest.
- Slieve Bloom Mountains SPA – 23km to the northwest.
- Timahoe Esker pNHA located circa 6km to the north east of the site.

6 The Appeal

6.0 Grounds of Appeal

6.0.1 The grounds of appeal assert that the reasons for refusal are not sustainable having regard to relevant policies, development guidelines and standards, planning precedent and demonstrable facts.

- The designation of the area as 'Open for Consideration' to wind energy development creates a positive disposition towards wind energy development in the area. In the designation process the planning authority had regard to the indicative wind resource of the area and the landscape sensitivity of the area.
- The proposed development complies with international EU, National, Regional and Local Development Policy.

- The development is consistent and compliant with all relevant national and local development criteria and guidelines.
- Previous decisions made by Laois County Council within the timeframe of the current county development plan did not require site specific wind data as a prerequisite to a grant of planning permission.
- The visual impact of the development does not compromise the residential amenity of the area.
- As regards allegation of insufficient evidence of project viability, it should be noted that data contained in the SEAI Wind Atlas are based on site specific hourly wind speed data captured by met eireann for the year 2006. The average wind speed for that year at 50m above ground level was 8.1m per sec. Expert advice indicates satisfaction that the wind resource at this location is sufficient to develop a viable project.
- The applicant has prepared a detailed financial model in respect of the development using a prudent approach. Using an average windspeed of 65m hub height of 7.5m per sec, significantly less than the 8.1m per sec windspeed at 50m hub height found in the wind atlas data, within the model confirms the economic viability of the proposal. Should site specific wind data be required for financial due diligence, it is noted that the erection of an 80m mast on site for a duration of 15 months is exempted under the 2008 Planning and Development Regulations (SI 235 of 2008).
- In relation to allegation of insufficient evidence that the project will not be visually injurious, the Entrust Visual Impact report sets out a detailed methodology in relation to visual assessment. Viewpoint selection was based on greatest amount of visibility or impact on the largest number of users at the most sensitive locations.
- Notably the request for additional information did not seek additional views nor did it request photomontage in the event of felling / clearfelling nor photomontage when rotor blades facing perpendicular to viewpoint.
- As regards the dwelling under construction (15/459) for which the application lodged subsequent to application now on appeal this is sufficiently close to viewpoint 6 to enable an assessment of visual impact.

- Proposal meets all the criteria detailed in the National Planning Guidelines and the County Development Plan in respect of wind energy development. It is small scale sited in an area zoned favourably for such development and set back more than 700m from the nearest occupied house.
- All development standards as recommended in the National Guidelines and in the Laois County Development Plan 2011-2017 including those in relation to shadow flicker, noise, set-back for public buildings and private houses are readily met.

6.1 Planning Authority Response

6.1.1 The Planning Authority did not respond to the appeal.

6.2 Observations

6.2.1 Observations are submitted by Mr Eamonn McGrath supported by local residents, Tom and Irene Doone, Alan and Sinead Bennett, Marie McGrath, Patrick Fennell and Eileen Grace, Larry Doone, Kim and John Byrne. First party assertions regarding meetings with local residents are disputed, though door to door calls with some local residents are acknowledged. Object strongly to the development as outlined in submissions to the Local Authority. Proposal will seriously injure the amenities of property in the vicinity and detract from the visual and other amenities of the area.

6.2.2 Brian Ramsbottom, Tullamoy, on behalf of the local residents group representing 82 families concurs with submission by Environmental Action Alliance. Proposal requires an EIS. Applicant fails to address cumulative impact. Precautionary principle should apply. Significant evidence demonstrates the negative impact of windfarms on property values. Lack of verifiable wind data. Photomontage not independent. There are two commonly known peregrine falcon nesting sites in close proximity and hen harrier is also known in this area. Baseline data does not contain a completed walkover flora and fauna, raptor / bird and bat survey on from Spring/Summer and one from Autumn / Winter of the site. Cannot claim that there is nothing of

significance. Note high court ruling in respect of zero silt deposit tolerance in streams and on waterways in relation to the protection of Nore Freshwater Pearl Mussel.³ On basis of the potential for future related development the application should be deemed to be piecemeal. County Laois is already playing its role in the National Renewable Energy Plan producing circa 80mw of wind energy to the grid. Further concentration of wind turbines in this area will have a negative impact on the community.

6.2.3 Submission by Environmental Action Alliance Ireland EAAI asserts that Environmental Impact Assessment and EIS is required. Appellant has not complied with Article 6 of the Habitats Directive 92/43/EEC, the European Landscape Convention, the Aarhus Convention and the proposed development is contrary to proper planning and sustainable development. The Council failed to carry out EIA screening and EAAI is now requesting the Board in accordance with Article 4(2) to carry out an examination using the criteria set out in Annex III to determine whether the proposed project shall be made subject to an assessment in accordance with Article 5 to 10 of the EIA Directive 2011892/EU. As EIA screening was wrongfully omitted this would automatically lead to an annulment of the decision. The further information Ecological Report (118 pages) clearly established that the proposed project will have likely significant effects on the environment based on:

- The location of the nearest Natura 2000 site is the River Barrow and River Nore Special Area of Conservation SAC 2.4km downstream.
- The Moyadd stream is 150m from the turbine flows sought to the Clogh River which is designated as part of the SAC approximately 5.4km downstream.
- Timahoe Esker proposed NHA is located 5.6km to the north.
- Typical winter and breeding bird assemblages and species of conservation concern.
- NIS screening assessment concluded that there was a slight risk of affecting some of the freshwater habitats and species of the river Barrow and River Nore SAC.

³ Ref High Court Ruling POW/EIAA Judgement 01/05/15 ref 2014 487.

- Note Board decisions 245717 and Cork County Council 15/00730 and PL17PA0038 Refusal Meath non-compliance with European landscape convention.
- Proposal cannot be considered sustainable development because it fails to meet economic environmental and social objectives.
- Failure to provide a non-technical summary within the NIS and of the significant further information in violation of the fundamental rights of the public under the Aarhus Convention.

6.2.4 Councillor Pdraig Fleming MCC observation indicates objection to the application on basis of absence of EIS and failure of Council to carry out EIA. Application is premature and will have significant adverse impact on the area.

7.0 ASSESSMENT

7.1 Having examined the file, considered the prevailing local and national policies and having inspected the site and assessed the proposal and all submissions, I consider the key issues to be considered in the Board's assessment of the proposed development can be addressed under the following headings:

- Policy Compliance – Principle of Development
- Landscape and visual impact
- Impacts on the residential and other amenities of the area including archaeology and roads.
- Ecological Impact
- Appropriate Assessment.
- Environmental Impact Assessment

7.2 Policy Compliance. – Principle of Development.

7.2.1 The proposed development is in accordance with national and EU policies which seek to promote the reduction of greenhouse gases and the advancement of renewable energy resources. The Planning Guidelines emphasise the importance of wind energy as a renewable energy resource and in general there is a presumption in favour of wind farm development in suitable circumstances. In relation to the Laois County Development Plan 2011-2017 as varied, it is the policy of the Council: “ET9 / P10 “to encourage the development of wind energy in accordance with Government Policy and having regard to the landscape Characterisation Strategy of the County and the Wind Energy Strategy.

7.2.2 The Wind Energy Strategy designates the site as part of an “Area Open for Consideration” for wind energy. The strategy outlines that applications in these areas will be treated on their merits with the onus on the applicant to demonstrate why the development should be granted permission. This category is used for areas that exhibit economically viable wind speeds, are sparsely populated, have some capacity to absorb wind development but which are sensitive enough to require a detailed site-by-site appraisal before any assumptions are made as to the suitability of the area for development.” Policy WES Six: Areas open for consideration states that wind energy applications in these areas will be evaluated on a case by case basis subject to viable wind speeds, environmental resources and constraints and cumulative impacts.

7.2.3 As regards the issue of viability of the site in terms of evidence of site specific wind speeds, I note the guidelines on wind farm development constraints in County as set out at Section 7 of the Wind Strategy 2011-2017 Laois County Development Plan 2011-2017. I note that the first party within the grounds of appeal refers to the SEAI Wind Atlas which is based on specific hourly wind data captured by Met Eireann for the year 2006. The first party also notes measured wind speeds at nearby locations and outlines that expert advice indicates satisfaction that the wind resource at this location is sufficient to develop a viable project. Whilst the landscape strategy within the development plan refers to a requirement for at least one year’s measured data before a project can be developed, it is not stated as a pre requisite to a grant of

planning permission. On the basis of the documentation provided on the appeal file, I consider that a refusal of permission based on lack of site specific wind data is not warranted.

7.2.4 The Third party submissions assert that a piecemeal approach to wind energy development in this part of Tipperary is contrary to the spirit of the EU Habitats and EIA Directives particularly in regard to the obligations to address cumulative impact and provide for thorough and comprehensive analysis of environmental impact. Whilst I would accept third party frustrations I note that it is reasonable that an individual application can be considered on its merit based on detailed site investigation and comprehensive information in respect of the site context. I note the significant relevance of cumulative consideration having regard to the unique characteristics of wind energy development proposals.

7.2.5 On the basis of the foregoing, I conclude that the development is in keeping with the principle policy provisions of the development plan and as such is a development that subject to compliance with other relevant environmental and policy considerations and detailed matters is acceptable in principle at this location. In overall terms the principle of location of windfarm development in the area is reasonable subject to the appropriateness of the proposal to the particular site and the nature and scale of the development. Having reviewed the relevant policies pertaining to the site and the area I consider that the planning policy context, having regard to EU, National and Local Policy considerations does not preclude the principle of development of a windfarm on the appeal site.

7.3 Landscape and Visual Impact

7.3.1 On the issue of landscape and visual impact. I would comment that the quality of the photomontage representations submitted with the initial application are extremely poor both in terms of their scale, colour and clarity. However, in response to the request for additional information a revised photomontage document was submitted

with 12 viewpoints representative of nearby residential properties, open views to the site and views from prominent locations in the vicinity.

7.3.2 Having regard to the limited scale of the development, and to the established character of the site, a landscape characterised by active commercial forestry management and to the topography of the area, I consider that the proposed turbine, notwithstanding its 90m tip height will not be unduly congruous on the landscape. As demonstrated in the photomontage selection document, submitted in response to the request for additional information, views to the site tend to be intermittent by virtue of the undulating nature of the topography and the intervening vegetation. I consider that the visual impact of the development is limited and the existing visual character of the area will be unchanged. On the matter of cumulative visual impacts, I conclude on the basis of the limited nature (single turbine) of the proposed development and distance from existing and permitted and proposed windfarms in the vicinity, the cumulative visual and landscape impact of the development does not give rise to concern.

7.3.3 As regards visual impact from dwellings in the vicinity I consider that the submitted viewshed reference points are adequate to enable assessment of the visual impact arising. On the issues referred to within the Council's reasons for refusal regarding absence of photomontage showing proposed turbine in the context of a clearfelled forest and rotor perpendicular and rotor facing views, I consider that such views to be of limited benefit and in terms of procedural matters I would tend to concur the first party that in the event that such views were required they should clearly have been specifically requested as part of the Council's request for additional information.

7.4 Impacts on the Residential and Other Amenities of the Area Including archaeology and impact on roads.

7.4.1 The application documentation notes that there are a number of dwellings (approximately 9) within 1km of the proposed turbine. A further dwelling pursuant to

permission 15/549 (which entered the planning system subsequent to the application for the windfarm) is currently under construction (and is acknowledged in the response to the request for additional information). I note that the closest dwelling to the appeal site which is located 280m to the north/north west of the proposed turbine was omitted from noise and shadow flicker assessments on the basis that it is a derelict dwelling and therefore not classified as an occupied dwelling under the Wind Energy Development Guidelines (2006). The application details that the nearest occupied dwelling is 682m to the south of the proposed turbine.

7.4.2 I note that the recommendations within the targeted review⁴ recommend a minimum 500m setback between any commercial scale wind turbine and the nearest point of the curtilage of any property in the vicinity in order to provide for amenity considerations eg. visual obtrusion. Notably an exception may be provided to the minimum setback where the owner of the relevant property is content for the proximity of turbines to be less than the minimum setback. Written confirmation to demonstrate agreement to the reduced setback is recommended in such cases. I refer to plates 11 and 12, (contained in the appendices to this report) which comprise photographic record obtained on the date of my site visit depicting the character of the dwelling which is 280m to the north / northwest of the proposed turbine location. Whilst this dwelling is evidently currently unoccupied and its access somewhat overgrown, it appears to be reasonably intact and in my view should not be discounted from the assessment in terms of amenity impacts in terms of visual impact, shadow flicker and noise. On this basis I consider that further review of potential impacts on this dwelling is required to inform an assessment of the effects of the proposed development on amenity.

7.4.3 I note in relation to shadow flicker that the current guidelines affirm that at distances of 10 rotor diameters from a turbine the potential for significant impact is low. In the case of the proposed development 10 rotor diameters equates to 570metres. The first party asserts that a modelling of study of shadow flicker effects on the 9

⁴ Proposed Revisions to Wind Energy Development Guidelines 2006, Targeted Review in relation to noise, proximity, and Shadow Flicker, December 11th 2013. Department of Environment Community and Local Government.

receptors located within 1km of the proposed turbine using the WindPro v3.1 software finds the maximum shadow hours / year likely to be experienced at property G which could experience up to 11:35 hours per year in a worst case scenario. The maximum shadow hours / day likely to be experienced is at property B which could experience up to 20 minutes per day in a worst case scenario. Both results are significantly below the guideline limit levels of 30 hours per year or 30 minutes per day. I note that the proposed revisions to wind energy development guidelines targeted review⁵, recommend that there be no shadow flicker at any dwelling within 10 rotor diameters of a wind turbine and further recommend that a detailed shadow flicker study for the purpose of modelling the impact of potential shadow flicker should accompany all applications for wind energy developments. I note that the aforementioned dwelling 280m north / northwest of the proposed turbine which was excluded from the detailed analysis clearly exceeds the 30 hours per year limit as per Figure 2 shadow flicker map.

7.4.4 As regards noise impact, it is asserted that modelling using the WindPRO software identified that noise levels generated by the development will comply with current guideline limits. The first party highlights the highest predicted noise level of 24.9dB(A) recorded at property A well below the 35-40dB(A) range allowed. I note that the noise contour map suggests that the closest dwelling is within the 35-40dB(A) range, however insufficient detail is provided to enable thorough analysis of the noise impact on this uninhabited dwelling.

7.4.5 On the issue of wind take the layout readily achieves the minimum two rotor blade distance from the landholding boundary as required by the current guidelines.

7.4.6 As regards archaeological Impacts, no significant implications in terms of archaeological aspects are predicted. SMR Maps for Co. Laois indicate that there are no known archaeological features within the site however within the general

⁵ Proposed Revisions to Wind Energy Development Guidelines 2006, Targeted Review in relation to noise, proximity, and Shadow Flicker, December 11th 2013. Department of Environment Community and Local Government.

locality, in particular the area to the southwest of the site there is a significant archaeological heritage although none within 1 km.

- 7.4.7 On the issue of traffic and roads impact, I note that the construction works for the proposed development are predicted to take two months approximately (a significant proportion of this being the concrete curing period of 28 days.) It is estimated that there will be 50 HGV Movements onto the site during the construction phase. Transportation route details were provided in the response to the Council's request for additional information and envisage seaport delivery to Rosslare. Some analysis of vertical and horizontal constraints for local road access is provided. It is noted that the transport of all turbine components will require abnormal load permits along the route. As regards road condition the R426 is in good condition with no weight restrictions and no strengthening required. It is asserted that the main impact of the transportation associated with the project will be the disruption caused to other road users during transportation of the turbine components. To mitigate this impact it is proposed that the transportation will be carried out at off peak times with escort vehicles front and rear. Prior to the transportation of the turbine components, a traffic management plan will be agreed with Laois County Council and the Gardaí.
- 7.4.8 As regards impact on property value, I note that the first party refers to accounts of no long term impact in terms of evidence from the UK and USA. I note third party comments which question the applicability of such evidence to the unique character of the Irish context. In any event, I consider that the question of property devaluation is an amalgamation of cumulative consideration of amenity impacts and is a factor in terms of good planning and sustainable development. In light of the proximity of the proposed turbine to the unoccupied dwelling located c280m to the north / northwest of the proposed turbine location, I consider that it has not been clearly demonstrated that the proposed development would not have a significant impact on the amenity of this dwelling and provides no detailed measures to mitigate such impact. On this basis I consider that it has not been demonstrated that the development is acceptable in terms of impacts on the amenities of the area relating to noise, shadow flicker and visual impact.

7.5 Ecological Impact

7.5.1 Flora and Fauna assessments were informed by two site visits 20th January 2016 and 4th May 2016 and desk study. The scope of bird assessment was based on two walkover bird / raptor surveys with a total of 15 hours of winter vantage surveys on the 18th and 25th February and 22 March while six hours of breeding season vantage point surveys were carried out on 15th April and 17th May 2016.

7.5.2 The turbine site is described as a clearing of rank overgrown wet grassland encroached with scrub and surrounded by a 20-year-old conifer (Sitka spruce) plantation. The main habitat of conifer plantation as an artificial habitat of recent creation is of limited biodiversity interest. There are remnant hedgerows of ash, blackthorn, and hawthorn paralleled by drains also bounding the clearing leading downhill towards the Moyad stream. The stream is described within the documentation as small and mostly densely shaded with no recording of plant species of conservation interest.

7.5.3 As regards water impact it is outlined within application documents that the land is drained by small feeder streams which join together west of the Swan for form the Moyadd stream which joins the Clogh stream to the south of The Swan. The Clogh Stream flows into the Dinin River a tributary of the River Nore. The Clogh River is designated as part of the River Barrow and River Nore SAC circa 5.4km downstream of the site. The nearest watercourse to the proposed development is approximately 30m to the north of the proposed turbine location. There are no new surface water drainage features proposed and it is proposed that all surface water flows will be silt trapped prior to entering existing drains. Good practice mitigation measures are proposed to mitigate potential risk of pollution during construction period. Best practice measures are proposed to safeguard water quality from potential effects of siltation or pollution by fuels or concrete that may arise from turbine or grid connection construction, decommissioning or forestry clearance. It is asserted that this will eliminate risk of impact on conservation interests such as Atlantic salmon, lamprey and otter. Notably the proposed turbine is not within a freshwater pearl mussel catchment.

7.5.4 As regards bird species, typical winter and breeding bird assemblages for mature conifer plantation were noted to be present. Twenty-one hours of VP surveys

resulted in observations of Hen Harrier, sparrowhawk, buzzard and kestrel, Roding woodcock was recorded during breeding bird surveys. Bat species recorded in the area included common pipistrelle, soprano pipistrelle, leisler's bat and brown long eared bat. A minor bat roost was located 2.8km from the proposed wind turbine location. The roost was likely a night roost occasionally used by a small number of bats and was not a maternity roost. Badger and Hedgehog signs were noted near the proposed turbine location but neither desk nor field surveys noted other rare threatened or protected plant or animal species in or near the site. As regards bird species of conservation concern that are sensitive to impacts from windfarm development recorded during the surveys are hen harrier sparrowhawk kestrel, lapwing and woodcock. Breeding lapwing are outside the potential zone that might be affected by displacement effects. Hen harrier are likely to use the area in winter and it is not clear how regularly the area is used. The 500m buffer around the turbine site contains only a relatively small area of potential hen harrier foraging habitat. It is outlined that as hen harriers range widely in winter and there do not appear to be any hen harrier roosts in the immediate vicinity of the proposed turbine site it seems unlikely that any displacement impacts due to the turbine will significantly reduce the availability of suitable foraging habitat for hen harriers in the area. On this basis displacement effects predicted not to be significant. As regards displacement effects to kestrel and sparrowhawk unlikely to be significant due to local populations of these species and due to the extent suitable habitat within the wider area. Woodcock and meadow pipit avoidance impact is not considered to be significant. As regards potential collision risk for kestrel and sparrow hawk is not predicted to be significant. Hen harrier are not likely to enter the collision risk zone and woodcock activity in the collision risk zone is likely to be low.

- 7.5.5 As regards bat species common pipistrelle and soprano pipistrelle were the most active bat species in the vicinity. The derelict farmhouse 280m to the north northwest of the site is likely to be used as an occasional night roost by a small number of bats, though not a maternity roost. Construction phase impacts on bats these are predicted to be short term and minor. As regards operational impacts the risk potential to Leisler's Bat is considered to be long term significant negative at the local scale. Mitigation measures include implementation of a bat buffer zone in line with Natural England 2014 Natural England Technical Information Note TIN 051 Bats

and Onshore Wind Turbines, Interim Guidance. The implementation of a bat buffer zone will result in the loss of 1.13ha of conifer plantation, all the remnant hedgerow in the immediate vicinity of the site (166.7m) and approximately 800m² of scrub. To compensate this loss, it is proposed that replacement planting of 0.5 to 1ha of native broadleaf trees for long term retention be carried out. To enhance biodiversity, the treeless buffer zone including any areas rehabilitated after wind turbine construction will be reseeded with semi natural grassland conservation grade seed mix. The buffer zone will be managed as a species rich damp meadow cut annually late in season with cutting removed from the site. Artificial lighting at the site will be avoided to ensure that bat species at risk are not attracted to feed near the lights. Pre and Post construction monitoring of bats is proposed including deployment of a passive bat detector at the turbine location for at least two weeks in the height of the bat active season (June-September) before the turbine comes into operation. Post construction monitoring at the same location and same time of year for two tests to compare bat activity results. In the event of high levels of activity mitigation including blade feathering and increase in cut in of wind speeds could be considered.

- 7.5.6 As regards interaction of impacts and cumulative effects, a wide range of potential impacts are examined. No significant adverse impact has emerged and all impacts anticipated are small, localised and will be managed and mitigated. Neither when the interaction of impacts is considered do combination effects appear. When the impact of concurrent projects including the Cullenagh Project and the Laois Kilkenny Grid Reinforcement Scheme are considered in conjunction with the proposed wind turbine no significant cumulative impact is determined. On the basis of the information submitted, and the ecological surveys and consultations, I consider that the proposed development, subject to the detailed mitigation measures as set out is acceptable in terms of its impact on ecology.

7.6 Screening for Appropriate Assessment

- 7.6.1 The obligation to undertake appropriate assessment derives from Article 6(3) and 6(4) of the Habitats Directive. Essentially it involves a case by case examination for a Natura 2000 site and its conservation objectives. Appropriate Assessment involves

consideration of whether the plan or project alone or in combination with other projects or plans will adversely affect the integrity of a European site in view of the site's conservation objectives and includes consideration of any mitigation measures to avoid reduce or offset negative effects. This determination must be carried out before a decision is made or consent given for the proposed plan or project. Consent can only be given after having determined that the proposed development would not adversely affect the integrity of a European Site in view of its conservation objectives.

7.6.2 The revised Natura Impact Statement, dated 10th May 2016 provided in response to the Council's request for additional information was prepared by Blackthorn Ecology. The report examines the likely effects of the proposed wind energy development both alone and in combination with other projects (PL11.242626 Cullenagh Windfarm and 11.VA0015 Laois Kilkenny Reinforcement Project) on the conservation objectives of Natura 2000 sites within the zone of likely influence 15km of the proposed windfarm and considers whether any possible impacts on the conservation objectives of any Natura 2000 sites can be characterised as significant. The revised NIS takes account of the core windfarm site and the grid connection route.

7.6.3 In terms of step 1 of **Stage 1 Screening**, the European Sites which could potentially be affected using the Source-Pathway-Receptor model are identified as follows:

Site Name	Site Code	Distance from windfarm site
River Barrow & River Nore SAC Clogh River Owenbeg River Fushoge River	Site Code 002162	5.27km hydrological distance 3.5km southwest 11.4km
Ballyprior Grassland SAC	Site Code 002165	7.6km to northeast
Lisbigney Bog SAC	Site Code 000869	12.km to southwest

Slieve Bloom Mountains SPA	Site Code 004160	23.5km northwest.
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7.6.4 Step 2: Identify the Conservation Objectives for these sites.

7.6.4.1 The Qualifying Interests for the River Barrow and River Nore SAC are as follows:

- [1130] Estuaries
- [1140] Tidal Mudflats and Sandflats
- [1170] Reefs
- [1310] Salicornia Mud
- [1330] Atlantic Salt Meadows
- [1410] Mediterranean Salt Meadows
- [3260] Floating River Vegetation
- [4030] Dry Heath
- [6430] Hydrophilous Tall Herb Communities
- [7220] Petrifying Springs*
- [91A0] Old Oak Woodlands
- [91E0] Alluvial Forests*
- [1016] Desmoulin's Whorl Snail (*Vertigo moulinsiana*)
- [1029] Freshwater Pearl Mussel (*Margaritifera margaritifera*)
- [1092] White-clawed Crayfish (*Austropotamobius pallipes*)
- [1095] Sea Lamprey (*Petromyzon marinus*)
- [1096] Brook Lamprey (*Lampetra planeri*)
- [1099] River Lamprey (*Lampetra fluviatilis*)
- [1103] Twaite Shad (*Alosa fallax*)
- [1106] Atlantic Salmon (*Salmo salar*)
- [1355] Otter (*Lutra lutra*)
- [1421] Killarney Fern (*Trichomanes speciosum*)
- [1990] Nore Freshwater Pearl Mussel (*Margaritifera durrovensis*)

Detailed Conservation objectives have been published for this site. 19th July 2011.

7.6.4.2 The qualifying interest for Ballyprior Grassland SAC Site Code 002256 is [6210] Orchid-rich Calcareous Grassland*.

7.6.4.3 The qualifying interest for Lisbigney Bog SAC Site Code 000869 is [7210] *Cladium Fens** and [1016] Desmoulin's Whorl Snail (*Vertigo moulinsiana*).

7.6.4.4 There is no ecological connectivity between Ballyprior Grassland SAC or Lisbigney Bog SAC and the proposed development site. In the case the Ballyprior grassland SAC the qualifying interest is terrestrial habitat which cannot be affected by a distant wind turbine. Lisbigney Bog is situated in a different groundwater catchment (Durrow aquifer) to the appeal site (Ballingarry aquifer) and there is no hydrological connection.

7.6.4.4 In the case of the Slieve Bloom Mountains SPA (004160) the site is a Special Protection Area (SPA) under the E.U. Birds Directive, of special conservation interest for breeding Hen Harrier. Guidance defines the core range of breeding hen harrier as 2km and the maximum foraging range as 10km. On the basis of the distance involved, the proposed turbine site is considered to be beyond the maximum foraging range of the Slieve Bloom Mountains SPA breeding hen Harrier population therefore there is no potential connectivity between the site and the Slieve Bloom SPA breeding hen harrier population.

7.6.5 Step 3. Identify the potential a) likely and b) Significant effects (direct or indirect) of the project along on the European sites solely within the context of the sites conservation objectives

7.6.5.1 The potential impacts with reference to the Natura 2000 sites' conservation objectives at various stages of the process include: Emissions to surface and ground water, run off, silt laden run off, hydrocarbon and other pollutants fuels / Construction materials to watercourses, loss of habitat or habitat degradation for fauna. Displacement, avoidance, barrier effect on commuting fauna. Collision.

7.6.5.2 In terms of significance I note only one Natura 2000 site for which there is a possibility for significant effect, this being the River Barrow and River Nore SAC. There is no potential for significant effects on the other natura 2000 sites due to lack of ecological connectivity and distance involved.

7.6.6 Step 4. Identify the potential a) likely and b) Significant effects (direct or indirect) of the project in combination with other plans or projects on the European sites solely within the contexts of the sites conservation objectives

7.6.6.1 The Cullenagh Wind Farm 11.424626 is located within a different sub catchment to the proposed development. All elements of the Laois Kilkenny Reinforcement project are within different sub-catchments to the proposed turbine, On this basis and having regard to the detailed mitigation measures set out to eliminate risk, I would concur with the findings of the submitted NIS that there is no potential for additional impacts on any of the European Sites for which pathways for impact were identified resulting from the cumulative effects of developments in the area.

7.6.7 Step 5. Evaluate Potential Effects identified above using the source pathway receptor model.

7.6.7.1 No direct impacts on European sites are predicted. Indirect impacts however cannot be excluded. The identified pathways for potential impact on the River Barrow and Riever Nore SAC are associated with the potential for surface water pollution via the surface water network as potential impacts on the European Site cannot be excluded, However the development has been designed to ensure that the identified pathways have been blocked through the design of robust drainage design and surface water treatment and good construction site management.

7.6.8 Step 6 Determine whether or not likely significant effects, either individually or in combination with other plans or projects on the European Sites can be reasonably ruled out on the basis of objective scientific information.

7.6.8.1 On the basis of the foregoing identified pathways for potential impacts exist in respect of the River Barrow and River Nore SAC having regard to the hydrological connection from the site.

I note that the following sites were screened out.

Ballyprior Grassland SAC Orchid-rich Calcareous Grassland*.

Lisbigney Bog SAC Site Code 000869 is [7210] *Cladium* Fens* and [1016] Desmoulin's Whorl Snail (*Vertigo moulinsiana*).

There is no ecological connectivity between these sites and the proposed development site. In the case the Ballyprior grassland SAC the qualifying interest is terrestrial habitat which cannot be affected by a distant wind turbine. Lisbigney Bog is situated in a different groundwater catchment (Durrow aquifer) to the appeal site (Ballingarry aquifer) and there is no hydrological connection.

In the case of the Slieve Bloom Mountains SPA (004160) the site is a Special Protection Area (SPA) under the E.U. Birds Directive, of special conservation interest for breeding Hen Harrier. Guidance defines the core range of breeding hen harrier as 2km and the maximum foraging range as 10km. On the basis of the distance the proposed turbine site is beyond the maximum foraging range of the Slieve Bloom Mountains SPA breeding hen Harrier population therefore there is no potential connectivity between the site and the Slieve Bloom SPA breeding hen harrier population.

7.7 Appropriate Assessment.

7.7.1 The stage 2 NIS considers activities and potential impacts on the qualifying interests of the River Barrow and River Nore SAC.

7.7.2 The screening assessment identifies potential pathways for impact through potential emissions to surface water on the River Barrow and River Nore SAC. (Ref Table 15)

7.7.3 Step 2 considers mitigation measures proposed which include water quality mitigation and best practice measures

7.7.4 Step 3 is an examination and evaluation of the potential effects of the project on the conservation objectives of the site taking account of mitigation. In relation to the **River Barrow and River Nore SAC [Site Code 002162]** the qualifying interest for which pathways for potential effects were identified within the NIS include atlantic salmon, brook lamprey, floating river vegetation, otter and river lamprey and white clawed crayfish. On the basis of detailed mitigation measures for protection of water quality in the proposed drainage design and site management programme in addition to the nature of the qualifying interest and

the hydraulic distance impacts on downstream aquatic habitats and distance estuaring and coastal habitats are unlikely. On the basis of this conclusion it is considered that the project would not affect the integrity of the European Site either individually or in combination with other plans or projects.

7.7.5 Having considered the submitted report, I am satisfied that the methodology used in the NIS report is clearly explained and information sources set out. I consider that the level of information provided allows the Board as the competent authority to assess the impact of the proposed development on the integrity of the adjacent Natura 2000 sites. Having regard to the mitigation measures proposed I consider that the conclusion that the proposed development will not adversely impact on the **River Barrow and River Nore SAC** is reasonably supported.

7.7.6 On the basis of the details provided and having regard to the small scale of the project I accept the assertion of the first party that it has been demonstrated that the cumulative impact of the development will not have adverse effect on the **River Barrow and River Nore SAC or any Natura site** in the light of the sites conservation objectives and that subject to the mitigation measures as proposed the proposed project will not adversely affect the integrity and conservation status of the River Barrow and River Nore SAC or any Natura 2000 sites.

7.8 Environmental Impact Assessment

7.8.1 On the matter of the Environmental Impact Assessment, I note that that the proposed development is sub threshold in terms of the prescribed development for the purposes of Part 10. Environmental Impact Assessment is required for “Installations for the harnessing of wind power for energy production (wind farms) with more than 5 turbines or having a total output greater than 5 megawatts”, as set out in Part 2, Schedule 5 - Development for the purposes of Part 10 (Environmental Impact Assessment) Planning and Development Regulations 2001.

7.8.2 On the issue of the criteria for determining whether the development would or would not be likely to have significant effects on the environment, I note the characteristics of the proposed development, (involving a single turbine with limited use of natural resources and waste and limited potential for pollution and nuisance) the location of the proposed development (within a highly modified landscape of coniferous forestry with good infrastructural connectivity and not an area designated as requiring special protection, distant from centres of population) and the characteristics of potential impacts (which are limited in extent magnitude and complexity have a limited duration and frequency). I consider that anticipated impacts are small, localised and are not significant. On this basis I consider that an Environmental Impact Assessment of the development is not required and the application documentation including the planning report and ecological impact assessment provides a sufficient level of information and detail to enable consideration of environmental impacts arising as result of the proposed development.

8.0 Conclusion and Recommendation

8.1 Having considered the file, the planning history and all submissions and having visited the site, I consider that the principle of development of a wind turbine on the appeal site is acceptable in principle in the context of the national and local policy context pertaining. I consider that based on analysis of the appeal site location the landscape has significant capacity to absorb development of this nature and I note the limited nature and scale of the proposal. However, I am not satisfied that the application provides a sufficient level of detail to enable a thorough assessment of the environmental impacts arising from the proposed development in particular in relation to the dwellinghouse circa 280m to the north northwest of the site and to provide for appropriate mitigation measures accordingly. The Board may seek further information to address these deficiencies. On the basis of the deficiencies in the appeal documentation I recommend refusal for the following reason:

Reasons and Considerations

1. Having regard to the nature of the receiving environment and proximity to a number of dwellings in the immediate vicinity including a dwelling located circa 280m to the north northwest of the proposed turbine location it is considered that the level of information provided within the application is insufficient to enable a thorough assessment of the environmental impacts arising from the proposed development with particular reference to noise, shadow flicker and visual intrusion, and to provide for appropriate mitigation measures accordingly. The proposed wind energy development would, therefore, be contrary to the provisions of the Wind Energy Guidelines for Planning Authorities issued by the Department of Environment, Heritage and Local Government in June, 2006 and would be contrary to the proper planning and sustainable development of the area

Brid Maxwell

Planning Inspector

4th January 2017