



An
Bord
Pleanála

Inspector's Report PL06F.248195.

Development

Demolition of house known as 'Ouvane' and construction of 3 no. houses, two new vehicular accesses onto Greenfield Road and two new pedestrian accesses onto the beach.

Location

Ouvane, Greenfield Road, Sutton, Dublin 13.

Planning Authority

Fingal County Council.

Planning Authority Reg. Ref.

F16A/0478.

Applicant(s)

Clondev Properties Ltd.

Type of Application

Permission.

Planning Authority Decision

Grant.

Type of Appeal

Third Party.

Appellant(s)

Margaret & Norbert Bannon and Colette & Peter Gillett.

Observer(s)

Hillwatch.

Inspector

Karen Kenny.

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1.0 Site Location and Description

- 1.1.1. The site is located on Greenfield Road, opposite St. Fintan's Church and the junction of Greenfield Road and Church Road. The site is rectangular in shape with a stated area of 0.1193 hectares. It is situated at the end of the built up area along the southern side of Greenfield Road, and is bounded to the west by a residential property, to the east by a public open space and to the south by Sutton Strand. The area is characterised by residential development of varying design. Dwellings immediately to the west are detached dwellings of contemporary design.

2.0 Proposed Development

- 2.1.1. The proposed development consists of the demolition of an existing detached dwelling and the construction of 3 no. detached dwellings as follows:
- One three storey, 5 bedroom detached dwelling.
 - One two storey, 4 bedroom detached dwelling.
 - One two storey, 3 bedroom detached dwelling.
- 2.1.2. The proposed development would include the relocation of an existing vehicular access to Greenfield Road and the creation of 2 no. additional vehicular accesses and the relocation of an existing pedestrian access to Sutton Strand and to create 2 no. additional pedestrian accesses. It is also proposed to divert a public surface water sewer within the site, to facilitate the proposed development.
- 2.1.3. The application is accompanied by a Natura Impact Statement and a Civil and Structural Engineer's Report.

3.0 Planning Authority Decision

3.1. Decision

Decision to Grant Permission, subject to 17 no. conditions. Condition no. 4 requires the erection of a hoarding adjoining Sutton Strand for the duration of site works. Conditions 15, 16 and 17 relate to the payment of financial contributions and security for the satisfactory completion of the development.

3.2. Planning Authority Reports

3.2.1. Planning Reports

The Planning Officers Report reflects the decision to grant permission. Further Information was sought seeking a Natura Impact Statement (NIS), revisions to House Type A (reduced 1st floor height) and revised boundary details to the northern and eastern site boundaries.

3.2.2. Other Technical Reports

Transport Section: No objection.

Water Services Section: No objection.

Parks Planning Section: No objection (following response to F.I.).

Heritage Officer: No objection (following response to F.I.).

3.3. Prescribed Bodies

Irish Water: No objection.

3.4. Third Party Observations

5 no. submissions were received. Issues that are additional to those raised in the grounds of appeal set out below are as follows:

- Site is subject to flood risk and risk of inundation from the sea.

4.0 Planning History

FS97/16/057: Certificate of exemption under Part V of the Planning and Development Act 2000 (as amended) granted for the current development.

- F16A/0517: Permission granted to extend the adjoining site to west 'Waters Edge' onto lands that are currently within the curtilage of the subject site.
- F14A/0103: Permission granted for the construction of a replacement dwelling on a site to the west of the application site.
- F13A/0124: Permission granted for the construction of a replacement dwelling on a site to the west of the application site.
- F05A/0676: Permission granted for the construction of a replacement dwelling on the adjoining site to the west of the application site.
- F97A/1130: Outline permission refused for a two storey dwelling on a site at Sutton Strand, Greenfield Road, Sutton.

5.0 Policy Context

5.1. Development Plan

The Fingal County Development Plan 2017-2023 is the relevant statutory plan. The decision dated 1st March 2017 was made under the previous Fingal County Development Plan 2011-2017. A number of Development Plan objectives are relevant:

- The appeal site is zoned RS “provide for residential development and protect and improve residential amenity”. Adjoining lands to the east and south are zoned HA “protect and enhance high amenity areas”.
- Section 11.4 relates to transitional zoning areas and states that it is necessary to avoid developments that would be detrimental to the amenities of the more environmentally sensitive zone. Objective Z04 is to have regard to development in adjoining zones, in particular more environmentally sensitive zones, in assessing development proposal for lands in the vicinity of zoning boundaries.
- Objective PM44 encourages the development of underutilised sites in existing residential areas subject to the protection of amenities, privacy and character,

while objective PM45 promotes contemporary and innovative design in such areas.

- Objective NH15 is to strictly protect areas designated or proposed to be designated as Natura 2000 sites.
- Objectives NH59 and NH60 seek to control development in coastal areas, protect the special character of the coast, accommodate new development within existing developed areas and ensure that development is designed and landscaped to the highest standards.
- Objective DMS175 prohibits development within areas liable to coastal flooding other than in accordance with The Planning System and Flood Risk Management – Guidelines for Planning Authorities, DEHLG and OPW 2009, while Objective SW07 requires a site-specific Flood Risk Assessment for lands with an identified flood risk. There is an identified risk of coastal flooding associated with the appeal site (OPW CFRAMS – Sutton and Howth North Tidal Flood Extents – Final July 2016 refers).
- Objective NH40 seeks to protect views and prospects that contribute to the character of the landscape, particularly those identified in the Development Plan. There are no specific protected views related to the appeal site or to the immediate area in the County Development Plan.
- The appeal site is located in the Sutton Cross & Environs ACA. Objective CH32 seeks to avoid the removal of structures that positive contribute to the character of an ACA. Objective DMS157 seeks to ensure that any new development positively enhances the character of the area and is appropriate in terms of the proposed design, including: scale, mass, height, proportions, density, layout, materials, plot ratio, and building lines. Objective DMS158 requires all planning applications in ACA's to have regard to the information in Table 12.11.

5.2. Natural Heritage Designations

The site is partially located within the designated area of two Natura 2000 sites:

- North Dublin Bay Special Area of Conservation (site code: 0206); and

- North Bull Island Special Protection Area (site code: 4006).

6.0 The Appeal

6.1. Grounds of Appeal

There is one third party appeal. The principal grounds of appeal are summarised as follows:

- Scale of development is excessive for this limited sized site located in a sensitive maritime area.
- Proposal is inappropriate in terms of the preservation of seascape and visual amenity and is out of character with the mainly low density housing along both sides of Greenfield Road.
- The site is prominently located at the end of the built up area, with the shoreline immediately to the rear and a public open space and paved walkway to the immediate south east. The appeal submission refers to the visibility of the site from Greenfield Road, the public beach, open space to east, Church Road and Strand Road. There is also reference to views to and from the site.
- Greenfield Road consists of detached dwellings of single and two storey design on large plots, giving a relatively low density character which sits readily in a maritime location.
- The site is at the end of the built up area and should be treated as a transition area stepping down in scale and density to the amenity lands to the side and rear.
- Adjoining house 'Waters Edge' is dissimilar to the housing and density pattern in the area (cramped in layout and appearance) and is not an appropriate precedent.
- The terrace type form and excessive scale of proposal on a modest and restricted site will produce a development that will not integrate into this sensitive visual context.

- No objection to replacement housing, reduced to a maximum of 2 no. dwellings and to the use of house types B & C only. Housing should be spaced out to provide for better assimilation.
- Excessive height of house type A is unwarranted and inappropriate. If permitted it should be 2 storey only.
- The site directly abuts two Natura 2000 sites – The North Bull Island SAC and the North Bull Island SPA and high amenity zoned lands. Statutory designations highlight the sensitivity of this edge / marginal site and the need to plan and design for more effective integration. The appeal refers to Development Plan objective Z04 in relation to transitional zonings.
- The provision of 2 new vehicular entrances on the heavily trafficked regional route directly opposite a substandard junction and the entrance to the local church and secondary school is undesirable and should be reduced in number.
- The shallow depth and public exposure of the rear gardens will render them of little amenity value.

6.2. Applicant Response

- Existing property consists of an elongated dwelling that takes up the majority of the site.
- Existing house has a footprint of 264sq.metres, while the combined footprint of the proposed houses is only 267sq.metres.
- No designated or preserved views from Church Road, in front of or to the rear of the site under the County Development Plan.
- Development will not inhibit the existing views from Church Road. Breaks between the dwellings will create new views of Dublin Bay from Church Road.
- The development will not encroach upon the designated Natura 2000 sites and Appropriate Assessment Report confirms that the proposed development will not have a significant effect on the SPA or SAC.

- There are a range of housing types and forms along Greenfield Road, which has been determined by the individual size and shape of the plots.
- Precedent and suitability of this area of Sutton and Greenfield Road has already been successfully established through the development of backland gardens and also the redevelopment of existing sites.
- Proposed development relatively low density considering the sites location within a built-up area.
- Marginal difference between the height of House A and the adjacent structure 'Water's Edge' (0.345m) compared to the separation between proposed Houses A, B and C will ensure that the minor difference in height will not be noticed at street level. The height of House A, has been carefully designed to provide balance and symmetry with the neighbouring Water's Edge, which is three storeys high on its eastern side. The proposed development then steps down to 2 storey for House B and House C, which helps create a natural flow to the design of the overall site as it adjoins the open space to the east. The stepping of House A adds a vertical design to the scheme. The omission of the third floor would take away from the architectural merit of the proposal and weaken the quality of the scheme.
- The existing dwelling has a similar set back to the rear and front boundaries while it directly adjoins the western boundary. Separation of between 2.5 metres and 3 meters is proposed between dwellings, whereas the existing house is in the form of a single wide and continuous block.
- Private open space is greater in size than that required by the Fingal County Development Plan.
- The proposed development will not encroach on preserved views from the east of the site and along Strand Road looking towards the sea.
- Proposed development seeks to maintain the residential use and nature of the subject site, ensuring that it is an appropriate land use adjacent to the more environmentally sensitive HA zoning, in accordance with Objective Z04 of the Development Plan.

- In relation to traffic concerns, parking has been designed to provide sufficient space for vehicles to drive in and turn. Greenfield Road is a suburban road with a restricted speed limit and has not been designated as a road to be protected from new vehicular entrances. The net increase of 2 no. entrances is a very minimal increase in traffic movements on the local road network.

6.3. Planning Authority Response

It is considered that the issues raised in the appeal are the same as those raised and assessed within the Chief Executive's Order. Consequently, no further comment is warranted by the Planning Authority. In the event that the Planning Authority's decision is upheld, the Planning Authority requests that Conditions No. 15, 16 and 17 are included in the determination.

6.4. Observations

1 no. observation has been received. No new issues were raised.

6.5. Further Responses

None.

7.0 Assessment

I consider that the main issues in this case are as follows:

- Principle of Development
- Visual Impact and Impact on Character of the Area
- Impact on Architectural Conservation Area
- Impact on Residential Amenity
- Flood Risk
- Other Issues
- Appropriate Assessment

7.1. Principle of Development

- 7.1.1. The application site is zoned RS “To provide for residential development and protect and improve residential amenity”. I am satisfied that the proposed residential development is acceptable in principle within the zoning category.

7.2. Visual Impact and Impact on Character of the Area

- 7.2.1. The existing structure to be demolished has a stated floor area of 361 sq. metres and a ridge height of 9.72 Above Ordnance Datum (AOD) at the highest point. The proposed dwellings are of contemporary architectural design, with flat roofs, cladding and extensive glazing on the rear elevation. House Type A is partially three storey and has a stated ridge level of 12.465 metres AOD at its highest point. House Types B and C are two storey and have a stated ridge level of 10.00 metres AOD at the highest points.
- 7.2.2. The appeal site is an established residential property situated between Greenfield Road and Sutton Strand and is at the end of the built up area on the seaward side of Greenfield Road. While the area is characterised by residential development of varying scales, dwellings immediately to west are two storey detached dwellings of contemporary design. The adjacent dwelling immediately to the west incorporates a 3 storey element. There is an established precedent in the immediate vicinity of replacing existing houses with contemporary dwellings. In this instance, it is proposed to demolish an existing dwelling (stated floor area of 361 sq. metres) and to replace it with 3 no. dwellings (stated floor area of 582 sq. metres). While this is considered to represent an intensification of development on site, the existing dwelling is elongated with a substantial footprint and it is considered that the proposed development would not significantly alter the overall footprint of development on site. While the height and overall extent of development would increase the proposed development is broken up into three separate blocks with gaps of 11.35 metres, 2.5metres and 3.0 metres between structures. The proposed dwellings are also smaller in footprint and scale when compared to dwellings on adjoining sites.
- 7.2.3. The appeal site is a marginal site between the beach and road that is visible from the surrounding coastal landscape, from Sutton Strand to rear and for a significant

distance along the coast roads to east and west. There is an established precedent of development abutting the coast to this point, and given the urban context, views along the coast incorporate built form. The appeal site is zoned for residential purposes and marks the end of the built up area with adjoining lands to east and south zoned high amenity. Having regard to the urban context, the established residential use on site and the scale of development proposed, I consider that the proposed development would not unduly alter views and prospects along the coast or be visually obtrusive.

7.2.4. The grounds of appeal express concern regarding the height of House Type A. I consider the third storey element of House A to be of modest scale (7m x 7m) and that the step down to 2 storey for House Types B and C creates a natural flow to the design of the overall scheme as it relates to the adjoining dwelling to west and the open space to east. It is considered that the third floor element provides a vertical emphasis and an element of variety and that its omission would weaken the overall design quality of the scheme.

7.2.5. I am satisfied that the proposed development on balance, represents an efficient use of zoned and serviced land and is in keeping with Development Plan policy in relation to urban infill and the protection of the coast. The development by reason of its design is in keeping with the character of development in the immediate vicinity. I am also satisfied that the overall scale and massing of the development is appropriate at this urban location and that it would not be unduly overbearing when viewed from the surrounding area. It is considered that the development would present a strong built edge to Greenfield Road and to the High Amenity zoned lands to east and south.

7.3. **Impact on Architectural Conservation Area (ACA)**

The appeal site is part of the Sutton Cross and Environs ACA. This ACA was introduced in the Fingal County Development Plan 2017-2023. The existing (c. 1970's) dwelling is not considered to be of any special architectural or historic merit or to contribute to the character of the area. I am satisfied that the proposal to demolish the existing dwelling would not conflict with Development Plan policy to avoid the removal of structures that positively contribute to the character of an

Architectural Conservation Area and that the proposed development would enhance the character of the area.

7.4. Impact on Residential Amenity

- 7.4.1. The proposed development is set off the adjacent dwelling to west by c. 11.35 meters. I am satisfied that, while there may be potential for overlooking of the property to west from the 2nd floor terrace of Dwelling A, this issue can be addressed through increased screening on that side. It is considered that the proposed dwellings will not give rise to overshadowing and that the development would not impact unduly on the amenities of dwellings in the vicinity.

7.5. Flood Risk

- 7.5.1. OPW CFRAMS Mapping July 2016 (Sutton and Howth North Tidal Flooding Extents) identifies that the appeal is subject to flood risk. The site adjoins Flood Zone A to the south and is within Flood Zone B. Mapping shows a historic flood event in the area (Ref. 0941c00005) dated February 2002.
- 7.5.2. The Planning System and Flood Risk Management – Guidelines for Planning Authorities, DEHLG and OPW (2009) require a systematic approach to flood risk management at each stage in the planning process. Table 3.1 of the guidelines indicate that residential development is a highly vulnerable development class and Table 3.2 indicates that such development can only be considered in Flood Zone A (high probability) or B (moderate probability), where it meets the criteria of the Development Management Justification Test detailed in Chapter 5 of the guidelines.
- 7.5.3. The Engineering Report submitted with the application acknowledges that the development is vulnerable to coastal flooding and proposes to raise the finished floor level of the development for flood resilience. There is no further detail in relation to flood risk assessment on the file.
- 7.5.4. Having regard to identified risk of flooding in the area and the highly vulnerable class of development proposed, I am not satisfied that the proposed development has been subject to an appropriate level of flood risk assessment, and that the assessment undertaken complies with the requirements of the Flood Risk Management Guidelines for assessment in such cases. In the absence of adequate information relating to the risk of flooding, analysis of such risk, and appropriate mitigating measures to address any risk, it is considered that the proposed

development would be contrary to the proper planning and sustainable development of the area.

7.6. Other Issues

- 7.6.1. I am satisfied that the development standards of the Fingal County Development Plan 2017-2023 with regard to separation between dwellings and open space standards are met and exceeded.
- 7.6.2. The appellants consider the provision of 2 new vehicular entrances on the regional route opposite a junction and the entrance to the local church and secondary school to be undesirable and request that the number of entrances be reduced. Having regard to the nature and scale of the development and the sites location within an urban area I consider that the additional traffic movements that are likely to be generated by the development would not be significant, create an unacceptable traffic hazard or unacceptable inconvenience to other road users.
- 7.6.3. The development will drain to the existing public drainage networks in the area.

8.0 Appropriate Assessment

8.1. Stage 1 Screening

- 8.1.1. This section of the report considers the likely significant effects of the proposal on European sites. The assessment is based on the submitted Natura Impact Statement (NIS).
- 8.1.2. The appeal site is partially within the designated areas of 2 no. European sites namely North Dublin Bay Special Area of Conservation (site code: 0206) and North Bull Island Special Protection Area (site code: 4006). The NIS considers the Natura 2000 areas below to be within the zone of influence of the development as pathways exist:
 - North Dublin Bay Special Area of Conservation (site code: 0206).
 - North Bull Island Special Protection Area (site code: 4006).
 - South Dublin and River Tolka Estuary SPA (site code: 4024).
 - South Dublin Bay SAC (site code: 0210).

- Howth Head SAC (site code: 0202)
- Baldoyle Bay SAC (site code: 0199)
- Baldoyle Bay SPA (site code 4016)
- Poulaphouca Reservoir SPA (site code: 4063)

8.1.3. The NIS states that these are the only Natura 2000 areas within the zone of influence of the development as pathways do not exist to other areas.

8.1.4. I have had regard to the Planning Authorities NIS Stage 1 screening assessment which determined that because of the nature and location of the proposed development it cannot be excluded that the proposed development, individually or in combination with other plans or projects, will not have a significant effect on a European site or sites.

8.1.5. I concur with the determination of the need to carry out a Stage 2 Appropriate Assessment in relation to 2 no. sites, namely the North Dublin Bay Special Area of Conservation and North Bull Island Special Protection Area. The appeal site is partially within the designated area of the North Dublin Bay SAC and North Bull Island SPA. There is therefore direct source – pathway – receptor linkages between the proposed development and these sites.

8.1.6. While I note the reference in the NIS to other designated sites that fall within the zone of influence, namely South Dublin and River Tolka Estuary SPA, South Dublin Bay SAC, Howth Head SAC, Baldoyle Bay SAC, Baldoyle Bay SPA and Poulaphouca Reservoir SPA, I am satisfied having regard to the nature and scale of the development and its proximity to these sites that no Appropriate Assessment issues arise and it is not considered that the proposed development would be likely to have a significant effect individually or in combination with other plans or projects on these European sites.

8.2. **Screening Conclusion**

It is reasonable to conclude that on the basis of the information on the file, which I consider to be adequate in order to issue a screening determination that that proposed development, individually or in combination with other plans or projects would not be likely to have a significant effect on European Site No. 4024 (South

Dublin and River Tolka Estuary SPA), No. 0210 (South Dublin Bay SAC), No. 0202 (Howth Head SAC), No. 0199 (Baldoyle Bay SAC), No. 4016 (Baldoyle Bay SPA) and No. 4063 (Poulaphouca Reservoir SPA), or any other European Site (save North Dublin Bay SAC and North Bull Island SPA), in view of the site's conservation objectives, and that a Stage 2 Appropriate Assessment (and submission of a NIS) is not therefore required. It is considered necessary to carry out a Stage 2 Appropriate Assessment in relation to Site No. 0206 (North Dublin Bay Special Area of Conservation) and No. 4006 (North Bull Island Special Protection Area) as likely significant effects cannot be screened out.

9.0 Appropriate Assessment - Stage 2

9.1.1. The relevant European sites are the North Dublin Bay SAC and North Bull Island SPA.

9.1.2. North Bull Island SPA (004006)

The qualifying interests for the North Bull Island SPA are as follows: Light-bellied Brent Goose (*Branta bernicla hrota*) [A046], Shelduck (*Tadorna tadorna*) [A048], Teal (*Anas crecca*) [A052], Pintail (*Anas acuta*) [A054], Shoveler (*Anas clypeata*) [A056], Oystercatcher (*Haematopus ostralegus*) [A130], Golden Plover (*Pluvialis apricaria*) [A140], Grey Plover (*Pluvialis squatarola*) [A141], Knot (*Calidris canutus*) [A143], Sanderling (*Calidris alba*) [A144], Dunlin (*Calidris alpina*) [A149], Black-tailed Godwit (*Limosa limosa*) [A156], Bar-tailed, Godwit (*Limosa lapponica*) [A157], Curlew (*Numenius arquata*) [A160], Redshank (*Tringa totanus*) [A162], Turnstone (*Arenaria interpres*) [A169], Black-headed Gull (*Chroicocephalus ridibundus*) [A179] and Wetland and Waterbirds [A999].

The conservation objectives for each qualifying interest are set out in the Conservation Objectives Series - North Bull Island SPA, NPWS, 9th March 2015. The objectives seek to maintain the favourable conservation condition of each qualifying interest, with favourable conservation condition defined in the report by a list attributes and targets.

9.1.3. **North Dublin Bay SAC (000206)**

The qualifying interests for the North Dublin Bay SAC are as follows: Mudflats and Sand Sandflats not covered by seawater at low tide [1140], Annual Vegetation of Drift Lines [1210], Salicornia and other annuals colonising mud and sand [1310], Atlantic Salt Meadows (*Glauco-Puccinellietalia maritimae*) [1330], Petalwort (*Petalophyllum ralfsii*) [1395], Mediterranean Salt Meadows (*Juncetalia maritime*) [1410], Embryonic Shifting Dunes [2110], Marram Dunes along the shoreline with *Ammophila arenaria* (White Dunes) [2120], Fixed Coastal Dunes with Herbaceous Vegetation (Grey Dunes), [2130], and Humid Dune Slacks [2190].

The conservation objectives for each priority habitat are set out in the Conservation Objectives Series - Conservation Objectives Series – North Dublin Bay SAC, NPWS, 6th November 2013. The objectives seek to maintain or restore the favourable conservation condition of each habitat, with favourable conservation condition defined by a list attributes and targets.

9.1.4. **Potential Effects**

The proposed development is partially within the designated areas of North Dublin Bay SAC and the North Bull Wall SPA and as such there is potential for impacts upon the Natura 2000 sites.

9.1.5. The NIS confirms that habitats within the site are entirely composed of buildings and artificial surfaces. The site adjoins the sandy shore of Sutton Beach and there is a narrow margin of coarse vegetation above the high tide line. This consists mostly of Lyme-grass with Sea Mayweed and Cleavers.

9.1.6. The NIS notes that Sutton Strand is an important roosting / feeding area for wintering wading birds and that a number of bird species were observed from the property boundary during the NIS survey, including Oystercatcher (*Haematopus Ostralegus*), Black-headed Gull (*Chriococephalus Ridibundus*), Turnstone (*Arenaria Interpres*), Curlew (*Numenius Arquata*), Hooded Crow (*Corvus Corone*), Rock Pipit (*Anthus Petrosus*), Redshank (*Tringa Totanus*), and Bar-tailed Godwit (*Limosa Lapponica*).

- 9.1.7. I note that it is proposed that inert construction and demolition waste will be removed by a licenced contractor and that drainage from the development will utilise existing connections to the public drainage networks.
- 9.1.8. I am satisfied that there will be no loss of habitat within the SAC/SPA and that there will be no appreciable change to run off properties from the site.
- 9.1.9. I consider that one significant effect is likely to arise, either alone or in combination with other plans or projects that may result in significant adverse effects to the North Bull Island SPA. This is in relation to disturbance effects arising from the construction phase of the project. The NIS recommends that a temporary hoarding is erected within the site boundary to the rear of the site adjoining Sutton Strand prior to the commencement of construction, that the hoarding be maintained in place for the duration of site works and that all access to the site is from Greenfield Road with no access from Sutton Strand during construction. The NIS states that this construction methodology has been employed for other projects in the area and that it comes with a high degree of confidence. I am satisfied that the proposed site management arrangements would mitigate any impacts on the SPA.

9.2. **Appropriate Assessment Conclusion**

On the basis of the information provided with the application and appeal, including the Natura Impact Statement, and in light of the assessment carried out above, I am satisfied that the proposed development individually, or in combination with other plans or projects, would not adversely affect the integrity of European Site No. 004006 and European Site No. 000206, in view of the site's Conservation Objectives.

10.0 **Recommendation**

Having regard to the foregoing I recommend that the decision of the Planning Authority be overturned in this instance and that permission be refused for the proposed development for the reason and consideration set out below.

11.0 Reasons and Considerations

The proposed development is in an area which is deemed to be at risk of flooding, by reference to OPW Flood Mapping and the Development Plan for the area. Having regard to the provisions of the Flood Risk Management Guidelines for Planning Authorities (2009), the Board is not satisfied, in the absence of adequate information relating to the risk of flooding, analysis of such risk, and appropriate mitigating measures to address any risk that the proposed development would not give rise to an increased risk of flooding of the site or of property in the vicinity. To grant permission for the development would therefore be contrary to the proper planning and sustainable development of the area.

Karen Kenny

Inspectorate

19 June 2017