

Bord Pleanála

Inspector's Report PL06S.249244.

Development	House with combined vehicular access off public road with existing house, wastewater treatment system and associated works. Crockaunadreenagh, Rathcoole, Co. Dublin.
Planning Authority	South Dublin County Council.
Planning Authority Reg. Ref.	SD17A/0204.
Applicant(s)	Fiona Brady.
Type of Application	Permission.
Planning Authority Decision	Refuse permission.
Type of Appeal	First Party.
Appellant(s)	Fiona Brady.
Observer(s)	None.
Date of Site Inspection	12 th December 2017.
Inspector	Ciara Kellett.

1.0 Site Location and Description

- 1.1. The appeal site is located in a rural area of Rathcoole, Co. Dublin known as Crockaunadreenagh. It is c.2.3km south of Rathcoole village and the M7. Large tracts of woodland are located to the east and south, Lugg and Slievethoul. Slade Valley Golf Club is located to the south of the site and Saggart Pitch and Putt Club is located to the north. The area is rural in nature and there are a number of one-off dwellings in the locality.
- 1.2. The site itself is stated as being 0.389 Hectares, roughly triangular in shape and it is on the northern side of a local road which provides access to the N81 road to the south-east. The road is very narrow with many bends as it rises towards the proposed location.
- 1.3. The site currently comprises an existing bungalow owned by the applicant's parents which is located on the western side of the site. The eastern side of the site comprises a disused overgrown tennis court with fencing bounding it. The site is served by a splayed entrance that is located centrally along the site. The site slopes from a high point of 267m AOD at the entrance down to 265.2m at the tennis court to 258m along the northern boundary. There is substantial well mature trees and hedgerows around the site. Either side of the site there are single storey dwellings. The site is elevated and provides long distance views towards south-west Dublin.
- 1.4. Appendix A includes maps and photos.

2.0 Proposed Development

- 2.1. The proposed development is for a single storey dwelling to be built on the eastern side of the site on the disused tennis court area. The site will be divided into two to serve the new dwelling and existing house. The new house comprises two 'wings' with a total area of 145.9sq.m connected by a central entrance porch. The western wing contains the living areas and the eastern wing contains three bedrooms. The design of the dwelling includes mono-pitch roofs on each wing sloping in opposite directions. The maximum height is 4.648m. Each roof is a planted sedum roof.
- 2.2. The eastern wing sits slightly forward of the western wing and a deck is proposed to the rear of the eastern wing.

- 2.3. Materials proposed as well as the sedum roof include cedar cladding, zinc cladding and a smooth white render finish on the walls. It is proposed to share the existing entrance on to the public road.
- 2.4. Accompanying the standard drawings and documents are photomontages, an Engineering Report, Traffic Report, Wastewater Report, Screening Report for Appropriate Assessment and a Visual Impact Assessment.

3.0 Planning Authority Decision

3.1. Decision

The Planning Authority decided to refuse permission for seven reasons. In summary the reasons are:

- The metropolitan area of the GDA has been identified as suffering from patterns of urban sprawl. Further development of the Metropolitan Area is to be consolidated. The proposed development would represent the proliferation of further haphazard development and could prejudice the sustainable achievement of the approved Regional Settlement Strategy for the Greater Dublin Area.
- 2. Proposed development would endanger public safety by reason of a traffic hazard.
- 3. The development would result in two dwellings on a site with significantly substandard road frontage within a rural zoned area. Road frontage would only be 43m and would represent substandard subdivision of the site to achieve infill development in an area under significant pressure for additional housing, on a site insufficiently large for two houses and would undermine the rural zoning of the land. Proposal would materially contravene the Development Plan zoning objective for the area.
- 4. The Development Plan requires road frontage of at least 60m minimum to preserve the rural character of the area and to avoid a suburban form of development. Proposed development would create a suburban form of development with a consequent impact on landscape character which would materially contravene Policy H27.

- Proposal would be located on an elevated site and require the creation of significant cut and fill and would be a dominant feature. It would result in a negative visual impact and would materially contravene policy H27 and policy HCL7.
- It is located within the Athgoe and Saggart Hills landscape area which is designated as an area with medium/high landscape value and sensitivity, and a Landscape Capacity which is negligible and therefore would be contrary to policy HCL7.
- 7. Proposal would set an undesirable precedent.

3.2. Planning Authority Reports

The Planner's Report is the basis for the Planning Authority decision. It includes:

- Site is zoned 'RU' which seeks to protect and improve rural amenity and to provide for the development of agriculture. Residential development is open for consideration if it does not conflict with the policies and objectives of the Development Plan, including housing needs criteria.
- Notes objective HA-DM which seeks to protect and enhance the outstanding natural character of the Dublin Mountains Area, is located to the south of the site.
- Notes objective to consider new dwellings where the applicant can establish a genuine need to reside in proximity to their employment OR has demonstrated close family ties to the rural community.
- Notes applicant has provided documentation going back to 1982 and considers that the applicant has close family ties to the rural area, and a new dwelling can be considered. Notes no further evidence has been provided regarding the applicant's housing need, or any exceptional circumstances that would require the construction of a new dwelling on this site. Considers that as the Council want to focus housing into existing settlements and restrict housing in rural zones, the onus is on the applicant to provide evidence of exceptional circumstances which would justify the setting aside of this policy.

- Notes proposal requires additional excavation to expand the tennis court platform to accommodate housing and parking to the front, and to lower the platform by 800mm with a retaining wall to the front garden.
- Notes house is of a contemporary design with mono pitch roofs with a maximum height of 4.7m with planted sedum roofs and rendered walls partly clad in cedar.
- Refers to photomontages which accompanied the application and does not accept the applicant's assertion that the visual impact would be positive.
- Notes the overgrown area of the tennis courts provide visual relief between the three dwellings and considers the addition of another dwelling would further compromise its remaining rural character. Notes the site is zoned rural but the viewpoint is from a High Amenity Dublin Mountain zoning.
- Refers to Development Plan requirement for 60m road frontage. Proposed dwelling would have 43m of frontage and would reduce frontage for existing dwelling. Considers this is of relevance to not only traffic, but broader strategic reasons as an indication of overdevelopment of rural areas and subdivision of sites to an inappropriate level of intensity.
- Notes applicant proposes a new wastewater treatment system for both dwellings. Notes groundwater is extremely vulnerable and existing plant is grossly under designed. Notes EHO has no objection.
- Refers to Roads Report for previous application. Notes applicant refers to DMURS. Planner considers that DMURS is not acceptable as it applies to urban roads. Subject road is a rural road and low speeds surveyed by applicant are as a result of the narrow width, the severe gradient and the poor forward visibility. Notes no provision for cycling or walking along the road and location would make it an entirely car-dependent development.
- Notes location within the Athgoe and Saggart Hills and that the area is highly vulnerable to development and development should be avoided. Any increase would have a negative impact and contrary to policy HCL7.
- Notes previous application was refused for six reasons. Considers that 5 of the 6 reasons have not been overcome.

• Recommends permission should be refused.

The decision was in accordance with the Planner's recommendation.

3.2.1. Other Technical Reports

- Water Services Section: no objection subject to conditions.
- Public Realm Department (Parks and Landscape Services): no objection subject to conditions.
- Heritage Officer: No report
- Roads: No report
- **EHO**: no objection subject to conditions.

3.3. **Prescribed Bodies**

- Irish Water: no report.
- An Taisce: State site is transitional being at the boundary of the High Amenity Dublin Mountain area, and note that no reason has been given as to why the applicant has to live in this area.

3.4. Third Party Observations

• One submission in support of the application was made.

4.0 **Planning History**

 Reg. Ref. SD16A/0158: Permission was refused by the Council in July 2016 for the development of a single storey dwelling on the site. There were 6 reasons for refusal similar to the current reasons for refusal. In summary: 1. The proposal would result in two dwellings with substandard road frontage and represent development of a suburban nature on an insufficiently large site for two houses and would undermine the rural zoning; 2. No proposal to provide additional road frontage, would reduce the road frontage to the existing dwelling and would result in the creation of a suburban form of development with a consequent impact on landscape character contravening policy H27; 3. The proposal would be sited on a highly visible elevated site, which is likely to result in removal of hedgerows to achieve sightlines, result in the construction of significant banking and platforming in the southern section of the steep site to accommodate the house proximate to the stream, and would be dominant on a sensitive site on the foothills and result in negative visual impact and contravene policies H27 and HCL7; 4. Endanger public safety due to generation of additional traffic on a substandard rural road; 5. Wastewater system may lead to pollution of the water course contravening policy HCL12; and, 6. Further development of the Dublin Metropolitan Area is to be consolidated to achieve a more compact urban form – proposal would represent the proliferation of further one-off housing.

Other applications in the vicinity were for domestic extensions and permissions associated with the Golf Club.

5.0 Policy Context

5.1. South Dublin County Development Plan 2016 - 2022

The zoning map for the area indicates that the actual site is located at the edge but within the 'RU' Rural zoning. The land on the opposite side of the road is zoned High Amenity.

Chapter 2 refers to Housing, Chapter 9 to Heritage, Conservation & Landscapes and Chapter 11 refers to Implementation. Schedule 5 refers to Definition of Use Classes and Zoning Matrix Table.

Section 2.5.0 refers to Rural Housing. The Plan states that '*It is the policy of the Council to restrict the spread of dwellings into rural and high amenity areas*'. **Policy H20** states:

It is the policy of the Council to restrict the spread of dwellings in the rural 'RU', Dublin Mountain 'HA-DM', Liffey Valley 'HA-LV' and Dodder Valley 'HA-DV' zones and to focus such housing into existing settlements.

With respect to Rural Housing in RU zone, Policy H22 states:

It is the policy of the Council that within areas designated with Zoning Objective 'RU' (to protect and improve rural amenity and to provide for the development of agriculture) new or replacement dwellings will only be permitted in exceptional circumstances.

H22 Objective 1 states:

To consider new or replacement dwellings within areas designated with Zoning Objective "RU" (to protect and improve rural amenity and to provide for the development of agriculture) where:

- The applicant can establish a genuine need to reside in proximity to their employment (such employment being related to the rural community) OR
- The applicant has close family ties with the rural community.

With respect to design, **Policy H27** Rural House & Extension Design:

It is policy of the Council to ensure that any new residential development in rural and high amenity areas, including houses and extensions are designed and sited to minimise visual impact on the character and visual setting of the surrounding landscape.

H27 Objective 1:

Ensure that all new rural housing and extensions within areas designated with Zoning Objective 'RU'......: (inter alia)

Is designed and sited to minimise impact on the landscape including views and prospects of natural beauty or interest or on the amenities of places and features of natural beauty or interest including natural and built heritage features; and......

Would not create or exacerbate ribbon or haphazard forms of development.

Section 9.2 of Chapter 9 notes that a Landscape Character Assessment has been prepared and it defines five landscape character areas including the Athgoe and Saggart Hills. **HCL7 policy** states:

It is the policy of the Council to preserve and enhance the character of the County's landscapes particularly areas that have been deemed to have a medium to high Landscape Value or medium to high Landscape Sensitivity and to ensure that landscape considerations are an important factor in the management of development.

Table 11.1 of Chapter 11 states that the objective of RU zoning is '*To protect and improve rural amenity and to provide for the development of agriculture*'. Residential development is '*Open for Consideration*' in accordance with Council policy for residential development in rural areas.

Section 11.3.4 specifically refers to Rural Housing. Section 11.3.4(ii) states that 'A minimum road frontage of 60m should be provided for all new dwelling sites in rural areas and a proliferation of housing along stretches of road in a manner that creates ribbon development should be avoided'. It also states 'Dwellings and extensions should not be located on a ridgeline or in an elevated position in the landscape'.

5.2. Sustainable Rural Housing Guidelines for Planning Authorities

The Guidelines refer to persons considered as constituting those with rural generated housing needs being persons who are an intrinsic part of the rural community, or working full-time or part-time in rural areas. The Guidelines refer to persons who are an intrinsic part of the community as having 'spent substantial periods of their lives, living in rural areas as members of the established rural community. Examples would include farmers, their sons and daughters and or any persons taking over the ownership and running of farms, as well as people who have lived most of their lives in rural areas and are building their first homes'.

Appendix 4 refers to Ribbon Development. It states:

These guidelines recommend against the creation of ribbon development for a variety of reasons relating to road safety, future demands for the provision of public infrastructure as well as visual impacts. Other forms of development, such as clustered development, well set back from the public road and served by an individual entrance can be used to overcome these problems in facilitating necessary development in rural areas.

And

Whether a given proposal will exacerbate such ribbon development or could be considered will depend on: The type of rural area and circumstances of the applicant, The degree to which the proposal might be considered infill development, and The degree to which existing ribbon development would be extended or whether distinct areas of ribbon development would coalesce as a result of the development.

5.3. Natural Heritage Designations

The Glenasmole Valley SAC (Site Code 001209) is located c. 7km to the south-east of the site.

6.0 The Appeal

6.1. Grounds of Appeal

An appeal has been lodged by Consultants on behalf of the First Party against the decision of the planning authority to refuse permission. A request for an Oral Hearing accompanied the appeal (see section 7 below). In summary, the appeal states:

- Refer to reasons 3, 4 and 5 which state proposal materially contravenes the Development Plan. Refer to section 37(2)(ii) of the Act which states that the Board can grant permission in instances where there are conflicting objectives in the Development Plan or objectives are not clearly stated. Lists reasons 3, 4 and 5 and refers to conflicting objectives in the Development Plan and lack of clarity in relation to policies and objectives outlined in these three reasons.
- Considers a number of reasons for refusal are invalid as they would not be easily understood by ordinary members of the public.
- Refer to number of errors Planning Authority made in the 2016 planning application. References two planning applications for rural dwellings in the vicinity that have been granted permission in 2004 and 2008 in similar zonings, as well as referring to other dwellings with shared access proposals.

Each reason for refusal is addressed by the applicant. In summary:

Reason No.1:

- Proposal does not prejudice the achievement of the approved Regional Strategy for the GDA. Proposal amounts to a rural generated dwelling which sets it apart from normal development pressure in this RU rural zone.
- Reference Appendix 4 of the Rural Housing Guidelines. State that there are 4 houses along this stretch of road with a combined road frontage of 290m. All four houses are set back and cannot be viewed as having a continuous road frontage. Photomontages were prepared. While this house would add a fifth house the use of the joint access and setting of houses ensures that they do not form ribbon development.
- Acknowledge development pressure in the area but consider local circumstances are unique – the applicant is a nurse and has ongoing lifetime serious health problems as does her mother. Seek symbiosis of care by building her own house beside her parents.
- The development does not amount to haphazard development by virtue of the lack of visibility of the houses and the shared entrance.

Reason No.2:

- State that the Planner relies wholly on the previous submission made by the Roads Department in which they incorrectly assessed the site as being located on Meaghen's Lane which is 2km away.
- Notes Planner disregards DMURS but contend that this site should be considered a rural fringe and DMURS applies.
- Consider that the road has more than adequate capacity to enable 2 cars to pass.
- Sightlines of 45m are achieved and refute that additional generated traffic will result in a traffic hazard. Proposal will result in a 2 way daily flow of 8 vehicles which is a 2% increase. Access has been used since 1978 without accident.

Reason No.3:

- Consider that there are no reasonable grounds for stating that the proposal would materially contravene the zoning objective on the basis of inadequate road frontage, substandard subdivision and insufficient size of site.
- Will address road frontage under reason no.4. There is no restriction of site size under the Development Plan and this form of development provides an entirely appropriate design response.
- The subdivision of the site will not amount to suburban level of development. It is a rural generated house.
- State that there is no basis for any conclusion that the proposal would undermine the zoning, let alone to a level that would materially contravene the RU zoning.
- Note that the Plan states that houses are permitted in the RU zoning in exceptional circumstances such as in this case, where the applicant has a close tie to the area and conforms to policy H22. Submit that the planning officer is wholly incorrect in relation to their interpretation of policy H22 and the RU zoning.
- Applicant is willing to have an occupancy condition attached.

Reason No.4:

- Refer to decision made under SD08A/0166 whereby the Council concluded that a shared entrance along a 60m boundary was acceptable in same zoning.
- The site has a roadside boundary of 93m and will remain unaltered.
- Two houses will be largely hidden from the houses either side, and will not be viewed as a collective. Proposal will not create a new residential site but utilise half of an existing residential site. Proposal cannot be considered ribbon development but infill. All criteria for ribbon development do not apply.

Reason no.5:

• Refer to policy H27 and note that Planner's Report refers to visual impact as being 'slight'.

- Consider measurements made by Planning Officer to be incorrect.
- There are no protected views and Visual Impact Assessment submitted illustrates that the proposal will not impact on views, as did the photomontages submitted.
- Proposed planting will add further screening and impact positively on view.
- The proposal will not have a negative impact on the environment wastewater fully assessed regarding the impact on groundwater quality.
 Proposed upgrade of existing septic tank for both houses will have a positive impact.
- Proposal was screened for Appropriate Assessment. No significant effects are likely to arise.
- Proposal is designed and sited to minimise impact; retains traditional roadside and field boundaries; circumvents need for intrusive engineering solutions; complies with EPA code of practice; will not create or exacerbate ribbon development.

Reason no.6:

- Planning Authority have interpreted the landscape ability to absorb development incorrectly – proposal does not amount to what in any reasonable assessment could be viewed as a significant cut and fill on a sensitive site.
- Applicant has clearly demonstrated that the proposal will have a slight and very minimal impact on the landscape character of the area and will not result in a significant change in landscape character.

Reason no.7:

 There is no reasonable reason why the proposal would amount to an undesirable precedent. The site is unique and already subdivided and forming a natural site for an infill house.

6.2. Planning Authority Response

The Planning Authority responded confirming their decision, and consider that the issues raised in the appeal have been covered in the Planner's Report.

7.0 Oral Hearing Request

The applicant requested that an Oral Hearing be held. Following consideration of the written evidence on file, the Board concluded that the appeal could be determined without the need for an Oral Hearing.

8.0 Assessment

The main issues are those raised in the grounds of appeal and I am satisfied that no other substantive issues arise. The issue of appropriate assessment also needs to be addressed. The issues can be dealt with under the following headings:

- Principle of Development
- Rural Character and Zoning
- Landscape and Visual Impact
- Traffic, Sightlines and Road Frontage
- Appropriate Assessment

8.1. Principle of Development

8.1.1. The site is located on the boundary of the RU and HA-DM zoning. It is situated within the RU zoning but the HA-DM zoning is immediately across the road. Policy H22 of the County Development Plan (the Plan) with respect to the RU zoning states *that within areas designated with Zoning Objective 'RU' (to protect and improve rural amenity and to provide for the development of agriculture) new or replacement dwellings will only be permitted in exceptional circumstances'.* Exceptional circumstances are where an applicant can establish a genuine need to live in the rural area or has close family ties to the area. The applicant has demonstrated close family ties to the area, albeit it is stated that the applicant works as a nurse elsewhere.

- 8.1.2. Policy H20 states that *It is the policy of the Council to restrict the spread of dwellings in the rural 'RU', Dublin Mountain 'HA-DM', Liffey Valley 'HA-LV' and Dodder Valley 'HA-DV' zones and to focus such housing into existing settlements.* I consider this policy to be reasonable and am satisfied that another dwelling in the RU zoned area would not be in support of the policy H20 and would not support the Council's policy to focus housing into existing settlements such as the nearby village of Rathcoole.
- 8.1.3. I am not satisfied that the subject dwelling is acceptable in principle. While the applicant has close family ties and complies with the exceptional circumstances as required by policy H22, the proposal will not be in compliance with policy H20 and would represent further haphazard development not in accordance with the policy of the Council to restrict the spread of dwellings into rural and high amenity areas.

8.2. Rural Character and Zoning

- 8.2.1. Reason no.3 states that the proposal would represent development of a suburban nature on an insufficiently large site for two houses, and would undermine the rural zoning of the land and surrounding area.
- 8.2.2. There are currently dwellings either side of the applicant's parent's dwelling as well as four entrances along this stretch of road. This proposal would represent a fifth dwelling. The zoning of the area is 'To protect and improve rural amenity and to provide for the development of agriculture'. To permit any further development of dwellings would be to undermine the zoning objective for the area. There are a substantial number of dwellings located in the general area and this proposed dwelling would contribute to this excessive density of development. Furthermore, it would add to the degree of haphazard and piecemeal development of the area and the degree of development on a single original landholding served by a substandard road.
- 8.2.3. I consider that this proposal would intensify piecemeal development in an area under significant pressure and would erode the rural character of the area. While I accept the applicant has close family ties to the area, I do not agree with the applicant that this is a rural generated dwelling.
- 8.2.4. There are already four dwellings along this stretch of road. The Sustainable Rural Housing Guidelines recommend against the creation of ribbon development for a

variety of reasons relating to road safety, future demands for the provision of public infrastructure as well as visual impacts. The Guidelines further state that whether a given proposal will exacerbate such ribbon development will depend on (inter alia) the type of rural area and the degree to which existing ribbon development would be extended. The addition of another dwelling in this area would exacerbate ribbon development in this rural area under significant pressure.

8.2.5. In conclusion, I consider that the proposed development would constitute undesirable ribbon development in this rural area outside lands zoned for residential development. It would undermine the Council's objective for this area to provide for the development of agriculture and would erode the rural character of the area further.

8.3. Landscape and Visual Impact

- 8.3.1. Reason no.5 and no.6 refer to visual and landscape impact. The design of the dwelling has attempted to minimise the visual impact of the proposal from the adjoining road with the addition of the mono-pitch sedum roof. Section 11.3.4(ii) of the Plan states that dwellings should not be located in an elevated position in the landscape. Due to the topography of the road as it winds up past the neighbouring dwelling, the new dwelling will be visible. As already stated, I consider that the area has very little capacity to absorb further dwellings and having regard to visual impact consider that there would be a resulting negative visual impact.
- 8.3.2. The site is located within the Athgoe and Saggart Hills landscape area which is deemed to have a medium-high landscape character sensitivity and a high landscape value. Policy HCL7 seeks to preserve and enhance the character of the County's landscapes, particularly areas that have been deemed to have a medium to high Landscape Value or medium to high Landscape Sensitivity and to ensure that landscape considerations are an important factor in the management of development. This landscape forms a valuable backdrop to the extensive urbanised area of the county. I am of the opinion that further housing development would compromise the integrity of its rural character and would undermine policy HCL7 which seeks to enhance and preserve that character.

8.3.3. In conclusion, I consider that the proposal would have a negative visual impact and would compromise the landscape character of the area.

8.4. Traffic, Sightlines and Road Frontage

- 8.4.1. Traffic hazard is referred to in the Council's reason no.2 for refusal. Substandard road frontage is referred to in reasons no. 3 and 4.
- 8.4.2. It is proposed to share the existing entrance, so I consider an argument could be made that there is no reduction in road frontage as such for either dwelling (existing and proposed). However, as the dwellings will be owned and occupied separately neither dwelling would have greater than 60m road frontage, as required in section 11.3.2(ii) of the Plan, Rural Housing Design.
- 8.4.3. The dwelling is outside of any settlement and has no easy access to public transport. The roads in the general vicinity are narrow with bends and there are no footpaths, verges or cycle lanes along most of the road serving the site. As a result the development will be entirely car dependent.
- 8.4.4. The applicant provided a drawing indicating sightlines of c.45m in each direction. A sign indicating bends in the road to the east is outside the applicant's site. The speed limit along this road is 60kph. I note that the applicant considers that DMURS should apply, contrary to the Roads Department assessment of the 2016 application using DMRB. The applicant states that DMURS requires a Stopping Sight Distance of 59m whereas DMRB requires 90m with an absolute minimum of 70m in a 60kph zone. The applicant carried out a speed survey and states that the 85th percentile and median speeds are below 50kph, and that over the course of the survey no vehicles exceeded 60kph and therefore the sightlines of 45m should suffice. However, the speed limit is 60kph and while the 85th percentile was below 50kph, there were clearly some vehicles driving above 50kph. Having regard to the steep gradient of the road, the narrow width of the road, and the lack of footpaths or verges, I am not satisfied that the inadequate sight lines are acceptable in this instance.
- 8.4.5. In conclusion, I consider that the proposed development would endanger public safety by reason of traffic hazard on this narrow road at a point where sightlines are restricted in both directions.

8.5. Appropriate Assessment

Having regard to the nature and scale of development proposed and to the nature of the receiving environment, 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 a European site.

9.0 **Recommendation**

I recommend that planning permission should be refused for the reasons and considerations as set out below.

10.0 Reasons and Considerations

- 1. It is the policy of the planning authority as set out in the current Development Plan to restrict the spread of dwellings into rural RU zoned areas, and to ensure that any new residential development in rural areas is designed and sited to minimise visual impact on the character and visual setting of the surrounding landscape. These policies are considered to be reasonable. The proposed development would be in conflict with these policies because, when taken in conjunction with existing development in the vicinity of the site, it would consolidate and contribute to the build-up of ribbon development in an open rural area. This would militate against the preservation of the rural environment and lead to demands for the provision of further public services and community facilities. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.
- It is considered that the proposed development would endanger public safety by reason of traffic hazard because of the additional traffic turning movements the development would generate on a narrow road at a point where sightlines are restricted in both directions.

Ciara Kellett Inspectorate

3rd January 2018