



An
Bord
Pleanála

Inspector's Report ABP-300322-17

Development

Completion of development permitted under 03/5 and 06/1139 consisting of 141 houses, crèche, 330 parking spaces, vehicular access, closing off and landscaping of existing vehicular access and site development works.

Location

Rockview Mountrath Road, Portlaoise, Co. Laois.

Planning Authority

Laois County Council

Planning Authority Reg. Ref.

16/527

Applicant(s)

Breven Commercial Limited.

Type of Application

Permission.

Planning Authority Decision

Grant Permission subject to Conditions

Type of Appeal

Third Party and First Party

Appellant(s)

Marie Conroy

Breven Commercial Limited

Rockview Residents

Observer(s)

None

Date of Site Inspection

7th March, 2018

Inspector

Stephen Kay

1.0 Site Location and Description

- 1.1. The appeal site is located to the west of the town centre of Portlaoise, approximately 1km from Main Street. The site is bounded to the north by the R445 (Mountrath Road) and houses that front onto the R445. This route connects Portlaoise to the N7 national primary route.
- 1.2. To the north west, the site is bounded by the Ashton Manor Estate, a development of 15 no. two storey dwellings that are accessed off the Mountrath Road. To the east, the site adjoins another small residential development, Westlands, that is also accessed via the Mountrath Road. To the west, the site adjoins undeveloped lands and beyond that is the ring road that connects the R445 to the N77 Abbeyleix Road to the south of the town.
- 1.3. The main area of the site comprises the undeveloped parts of an existing residential development called the Rockview Estate. There have been a significant number of houses completed within this area, 88 no. in total, with the majority of these being located at the southern end of the site where they adjoin the railway line. Clusters of other dwellings are however located throughout the site and a substantial section of the road infrastructure is completed linking these completed residential areas.
- 1.4. The layout of the application boundary is such that the existing completed residential development is excluded. The bulk of the existing roads are however included as are a number of uncompleted residential sites. Existing roads within the development are substantially completed with top course and also with road markings. There is public lighting within the completed areas of the estate.
- 1.5. The undeveloped areas of the site are currently fenced off from the completed and occupied areas with this fencing appearing to be relatively recently installed. Significant variations in levels are evident across the site both within the completed areas of residential development and in the areas proposed for development.
- 1.6. The total stated area of the site is 5.81 ha and the site area including the existing developed areas of the Rockview Estate is 8.08 ha.

2.0 Proposed Development

- 2.1. The proposed development comprises a residential scheme of 141 no. residential dwellings and a two storey crèche building. The development is proposed to be integrated into the existing site such that the 88 no. dwellings, infrastructure and roads completed to date on the site are incorporated into the overall layout.
- 2.2. The dwellings proposed comprise a mixture of two, three and four bedroom units in a mixture of terraced, semi detached and detached layouts. The floor area of the proposed units varies between 83 and 128 sq metres and a schedule of areas has been submitted as part of the Planning Report prepared by Thornton O'Connor planning consultants submitted with the application. The breakdown of proposed units is as follows:
- 35 no. four bed houses
 - 91 no. three bed houses
 - 15 no. two bed houses

The layouts proposed are as follows:

- 30 no terraced houses,
 - 106 no. semi-detached houses and
 - 5 no. detached houses.
- 2.3. The proposed crèche is located at the north east corner of the site on a corner site with a total of 16 no. parking spaces proposed to be provided to serve the crèche. The floor area of the crèche is 358 sq. metres and it is stated to have capacity to accommodate a total of 61 no. children. An open space area of c. 130 sq. metres is proposed to be provided.
- 2.4. Private amenity space is proposed to be provided with all houses. The amount of private open space provision varies within the proposed layout however the minimum level of open space for a four bedroom unit is 80 sq. metres and that for a 2 or 3 bedroom unit is a minimum of 60 sq. metres. In a significant number of cases

the open space provision significantly exceeds these minimum levels and there is significant variation in the open space provided as the layout is constrained to some degree by accommodating the existing housing and infrastructure on the site.

- 2.5. Within the overall development, a total of 330 no. parking spaces are proposed to be provided which equates to 2 parking spaces per dwelling with an additional 48 no. to serve the crèche and for visitor parking. The submitted layout plan does appear to indicate 36 no. visitor parking spaces grouped around public open space areas 5 and 6 at the southern end of the site.
- 2.6. Public open space is proposed to be provided in a total of seven open space areas throughout the site. Some of these open space areas have already been developed on site and the largest of these open space areas are 4, 5 and 6 located at or close to the southern end of the site. The combined area of these proposed public open space areas is stated to be 8,770 sq. metres which equates to slightly over 10 percent of the site area.
- 2.7. The site access and road proposals incorporate the existing road network as constructed within the site. The existing site access to the R445 is proposed to be relocated to a position further to the west with the stated aim that congestion and traffic hazard at the access of the site caused by the proximity to an existing roundabout on the R445 at the north east corner of the site.
- 2.8. The residential layout proposed has had regard to the existing completed dwellings on the site and to completed infrastructure in the form of roads and part completed housing sites. The application is accompanied by a Design Statement prepared by McCrossan O'Rourke Manning Architects that set out the design decisions and rationale in the development. It is stated by the applicants that relative to the previously permitted residential layouts on the site that the proposed layout is less linear and more in compliance with the provisions of the Sustainable Residential Development Guidelines and with DMURS. The proposed layout incorporates the use of home zone areas and a pedestrian connection is proposed at the north east corner of the site in the vicinity of the existing vehicular access to the site.
- 2.9. Proposals for compliance with Part V requirements have been submitted with the application and a total of 14 no. units are indicated as being set aside for social housing.

2.10. The stated density of the proposed development is 28.3 units per ha. calculated on the basis of the overall development comprising existing and proposed new dwellings. The density is therefore relatively low, however the submitted Design Statement sets out a justification for this density having regard to the limitations arising from the existing completed parts of the development including the location of services.

3.0 Planning Authority Decision

3.1. Further Information

Prior to issuing a Notification of Decision, the Planning Authority requested further information on the following issues:

1. Proposals as to how the principles set out in DMURS are to be incorporated into the development.
2. Clarification of the compatibility of the design speed of 20 km hr with the road layout incorporating long straight sections.
3. Plan showing the existing and proposed site levels plus structural supports for example retaining walls proposed.
4. Revised proposals for the Part V housing locations with them pepper potted throughout the site rather than clustered.
5. Revised proposals for the turning area at Rockview Close in the vicinity of the crèche.
6. Revised proposals for house sites nos. 8-11 to provide for greater separation between units.
7. Revised proposals for nos 17-20 that better reflect the form of surrounding houses.
8. Relocation of open space area No.6 to the northern part of the site to ensure better distribution of open space.
9. Elevation drawings of house type E required.

10. Revised proposals for the site access to the R445 which is proposed to form part of the Portlaoise Southern Circular Route. A Traffic and Transport Assessment and modelling exercise is required.
11. Details of lighting within the development.
12. Plan showing the identification of car parking spaces and parking proposals in the vicinity of the crèche.
13. Redesign of the road network to provide for traffic calming and compatibility with DMURS.
14. Demonstrate access for bin collection vehicles in the development.
15. Provide storm water calculations that show adequate design of system.
16. Detailed drawings and calculations for the storm water attenuation on the site.
17. Details and drawings of the proposed storm water discharge points from the site.
18. Survey of the surface water drain on the R445 to demonstrate it can accommodate the additional discharge from the development proposed.
19. Revised footpath layout and a walkability survey.
20. Site layout showing all proposed road markings and signage. Map showing how parking spaces relate to dwellings.
21. Undertake a road safety audit.
22. Submit a construction stage traffic management plan.
23. Submission of requirements of Irish Water including that water and wastewater services can be provided. Confirmation of capacity at waste water treatment plant to also be provided.
24. Comment on third party submissions received.

The following is a summary of the main changes and additional information submitted by the first party in respect of the request for further information issued by the Planning Authority:

- The revised layout submitted proposes the reduction in total number of dwellings from 141 no. to 137 no. The reduced unit number derives from changes to the design of Nos. 8-11 and the replacement of the 4 no. terraced dwellings at Nos.17-20 with 2 no. semi detached.
- A Design Statement by McCrossan O Rourke Manning Architects has been submitted which sets out the design rationale for the proposed layout.
- A reduction in the size and capacity of the crèche with a single storey building now proposed with a reduction in floor area from 358 sq. metres to 150 sq. metres. Capacity proposed to be c. 44 children.
- That open space area No.6 has to be retained as there are significant services in this area. The overall area of open space has been increased such that it totals 9,530 sq. metres which is c. 11.8% of the total site area.
- The traffic and transportation assessment concludes that the increased traffic generation will be mitigated by the improved roundabout and the revised access arrangements. The R445 will remain within capacity.
- Parking on site has been revised to a total of 310 no. spaces. Each house has 2 no. parking spaces with 18 no. visitor spaces and 16 no. spaces for the crèche. Ref. Plan No. AI02.
- That the site size and existing development dictates an orthogonal road layout and straight sections of road are relatively limited. Homezone carriageways are 6 metres wide with entrances to streets reduced to 4.8 metres. Standard carriageway widths are 5.5 metres.
- Revisions to the layout of the Part V social housing as per drg. AI15. The Part V housing is now proposed to be in five separate locations.
- The existing mini roundabout located on the R445 to the north east of the site is proposed to be upgraded with pedestrian and cycle facilities provided. These facilities to be extended to the revised site entrance and pedestrian crossing of road provided between new site access and roundabout.
- A Drainage and Water Supply Report prepared by Kilgallon and Partners has been submitted.

- Surface water will only be discharged via one location and design calculations have been submitted. The surface water system has been designed to restrict the discharge to a peak rate of 18 l/sec.
- A pre connection inquiry has been submitted to Irish water.

3.2. **Decision**

The Planning Authority issued a Notification of Decision to Grant Permission subject to 23 no. conditions. The most significant of these conditions are considered to be as follows:

Condition No.1 – that permission is for 137 no. units and as per the revised layout submitted on 22nd September, 2017.

Condition No.2 requires the submission of a phasing plan.

Condition No.4 requires that prior to the commencement of development the applicant to sign a connection agreement with Irish Water and shall adhere to the standards and conditions set out in that agreement.

Condition No.8 requires that the road layout shall comply with DMURS.

Condition No.11 requires that the 14 no. units identified in the submission received 22nd September, 2017 shall be transferred to Laois County Council in compliance with Part V.

Condition No.15 sets out a number of issues relating to surface water that are to be agreed and complied with in the development.

Condition No.23 requires that the developer shall construct the proposed roundabout on the R445.

3.3. **Planning Authority Reports**

3.3.1. Planning Reports

The initial report of the Planning Officer notes the planning history and background to the development and sets out the significant number of objections received. The principle of development and the proposed density is considered to be acceptable

having regard to the land use zoning objective for the site and the existing developed nature of part of the site. A number of issues are identified of concern relating to the road layout, residential layout and the access to the development as well as site servicing. A significant number of items of further information are recommended as being required.

A second Planning Officer report subsequent to the submission of further information sets out the response to the further information submitted and concludes that the proposed development is acceptable subject to conditions.

3.3.2. Other Technical Reports

Waste and Environment Report – Report 1 in March 2016 had no objection to the proposed development subject to conditions.

Fire Officer – No objections.

Irish Water – Report recommends that further information be requested regarding written confirmation from Irish Water that water and water services connections can be provided and that there is adequate capacity in the Portlaoise waste water treatment plant.

Road Design – Initial road design report recommending further information relating to the undertaking of a TTA to include modelling of the section of the R445, lighting, details of crèche, internal road design and compatibility with DMURS, access for bin lorries, storm water details, revised footpath layout and parking layout. No Report subsequent to the submission of further information indicates that road design have no objection subject to conditions.

3.4. Third Party Observations

A significant number of third party observations were received by the Planning Authority prior to the issuing of a Notification of Decision. The main issues raised in these submissions received at the initial application stage and post submission of a response to further information can be summarised as follows:

- That the proposal represents over development of the site.

- That the access onto the R445 would result in a traffic hazard.
- That the parking and drop off facilities for the crèche are inadequate and that the scale of crèche including 2 storey design is excessive.
- Inadequate open space provision and that the open space is concentrated in the southern part of the site.
- That the proposed development will overlook existing houses within the estate and in Ashton Manor.
- That the parking layout for the houses close to the access junction and access road is dangerous.

4.0 Planning History

Laois County Council Ref 03/05 – Permission granted by the Planning Authority for the construction of a single storey childcare facility and 257 no. residential units including 147 no. houses and 110 no apartments on a site comprising the current appeal site and the completed areas of the Rockview Estate which are excluded from the current application site.

Laois County Council Ref. 06/1139; ABP Ref. PL11.222247 – Permission granted by the Planning Authority and decision upheld on appeal for the change of house type and residential layout from the development permitted under Ref. 03/05 to consist of a single storey childcare facility and a total of 200 no. residential units comprising 158 no houses, 30 no. apartments and 12 no. maisonettes.

5.0 Policy Context

5.1. Development Plan

5.1.1. Laois County Development Plan, 2017-2023

Zoning of the site is under the LAP for Portlaoise. There are however a number of development management policies contained in the County Development Plan that

are of relevance to the proposed development and copies of the relevant policies are attached with this report. The following are specifically noted:

- Portlaoise is identified as a Principal Town in the Midlands Regional Planning Guidelines, and supports a linked gateway comprising Portlaoise, Tullamore and Athlone.
- As per Table 5 of the Core Strategy, the projected population growth over the plan period in Portlaoise is 5,237 which equates to 1,824 households and generates a housing land requirement of 78 ha. based on a density of 35 units per ha. The area of land zoned in the plan is stated to be 78 ha. Section 8.3 sets out principles for design and 8.3.1 states that the council will have regard to the detailed design guidance provided in the Urban Design Manual produced by the DoEHLG.
- Policy DM01 states that developments will be assessed against the criteria set out in the Sustainable Urban Housing Guidelines for Planning Authorities.
- Policy DM03 states that density should be consistent with the above guidelines.
- Policy DM05 sets out the extent and range of open space that should be provided in residential developments.
- Policy DM06 states that private amenity space of 60 sq. metres for a two bedroom house and 75 sq. metres for three and four bed houses is required.
- Policy DM28 relates to childcare facilities and stated that proposals will be assessed in accordance with Childcare Facilities Guidelines for Planning Authorities (2001).
- Policy DM42 requires compliance with DMURS.

5.1.2. **Portlaoise Local Area Plan, 2012-2018**

The site is located within the area covered by the *Portlaoise Local Area Plan, 2012-2018* which was adopted in October, 2012. The preparation of a new LAP has

commenced with the issuing of an issues paper but no draft plan has yet been published.

The site is zoned Residential 1 under the provisions of the Portlaoise Local Area Plan, 2012-2018 with the objective '*to protect and enhance the amenity of developed residential communities*'. Crèches and dwellings are both identified in Table 15 of the LAP as uses that 'will normally be permissible' on lands zoned Objective Residential 1.

This land use zoning has a stated purpose which provides for the following:

- That the main use is residential but may include a range of other uses including crèches.
- That it is an objective within this zoning to protect the established residential amenity and to enhance the overall residential function of the area.
- Within this zoning category the improved quality of existing residential areas will be the Council's priority.
- In areas in areas at risk of flooding as identified on the land use maps, where the replacement or the reconstruction of an existing dwelling is considered appropriate, there will be a requirement for a development management justification test and other requirements including no increase in overall residential units.

The plan states that Guidelines for Sustainable Residential Development in Urban Areas 2008 should be used to guide planning applications. Reference is also made to the Best Practice Urban Design Manual that accompanies the Guidelines. It is stated that higher densities must be accompanied by qualitative standards of design and layout, 'leap frogging' to be avoided and the scale of development to be proportionate to existing.

Specific standard for public open space at the rate of 10% of the gross site area with a minimum unit of open space of 200 sq. m. and 10 m. as a minimum dimension of any side. A minimum of 80sq.m of public open space per dwelling will be required in new residential developments.

Applications for childcare facilities in a residential area will be assessed on the basis of their impact in terms of noise, loss of residential amenity, traffic generation and general disturbance.

5.2. **Natural Heritage Designations**

The site is not located within or adjacent to any identified European site. The closest European sites to the appeal site are the Slieve Bloom Mountains SPA located c.8km to the west of the site, the River Barrow and River Nore SAC and the River Nore SPA located c.10km to the east and south west of the site respectively.

6.0 **The Appeal**

6.1. **Grounds of Appeal**

The following is a summary of the main issues raised in the third party grounds of appeal:

- That the layout proposed results in an excessive clustering of Part V housing with 80 percent (16 out of 20 Part V units in the overall development) located in the one part of the site.
- There is concern at the stability of the wall located at the rear of Nos.1-5 Rockview Green.
- There is concern at the relative ground levels and the potential for the overlooking of the rear of houses at Nos. 1-5 Rockview Green. The floor level of the proposed dwellings in this area is excessive relative to the existing houses.
- That the access junction is dangerous and there would be conflict with the existing traffic on the roundabout to the north east.
- That the revised residential layout submitted as FI indicates a house type A2 proposed in the vicinity of existing dwelling at No.2 Ashton Manor. No details

of this house type have been submitted and the permission should be refused as per the decision of the Board in case Ref. PL11.247804.

- That the entrance to the site and the layout of parking spaces to serve dwellings Nos. 1-8 is dangerous and would lead to a traffic hazard from cars reversing out onto the access road near the site entrance.
- That the proposed T junction to the Mountrath Road (R445) is inadequate to cater for the proposed development.

The following is a summary of the main points raised in the first party appeal against Condition No.23:

- That the revised access layout and works to the existing roundabout were proposed to improve safety at the access and reduce congestion. The proposed works will have a beneficial impact for other road users in addition to the residents of the proposed development. It is therefore considered appropriate that the cost of the works would be apportioned between the developer and the local authority in a fair way reflecting the above. A suggested revised wording for Condition No.23 is put forward. This does not specify a cost as there has not been sufficient time available to fully cost the proposed works prior to the expiry of the appeal period.

6.2. First Party Response

The following is a summary of the main issues raised in the first party response to the third party grounds of appeal:

- That contrary to the statement of the third party appellants the Part V housing is proposed to be in five distinct locations rather than the two indicated. Part V housing will be to the same standard as the rest of the development and the mix proposed is as requested by the Planning Authority.
- Regarding the structural stability of the retaining wall at the rear of the houses in Rockview Green, this area is indicated in Drg. No. 16094-401 which includes typical sections through the area. No change to ground level on the

north side of this retaining wall is proposed and the rear gardens of the houses to the north of the retaining wall will be terraced to achieve this.

- With regard to the overlooking of dwellings in Rockview Green, the separation between existing and proposed dwellings is c.23.5 metres. It should further be noted that the previously permitted 2006 layout had houses to the rear of the existing dwellings in Rockview Green and the occupants of Rockview Green would have been aware of this when purchasing their homes.
- That the layout in the vicinity of No.2 Ashton Manor has been modified to address the concerns of the appellant at No.2 Ashton manor. The separation to the new development has been increased to be 5 metres from the boundary and 12.8 metres from the dwelling.
- A copy of the plans of the proposed house type A2 have been submitted.
- That the parking proposed accessing onto the spine road is such that traffic speeds will be constrained by the proximity to the access and the proposed bend and speed table to the south. The layout has been the subject of a road safety audit.
- That the proposed T junction at the access has been designed to be in accordance with DMURS. Traffic assessment at this location shows that the junction will operate within capacity.
- Regarding the proximity of the proposed T junction to the access to Ashton manor estate, the proposed new T junction would achieve a 2.4 metre by 49 metre sight line on both sides of the junction. There is not considered to be any conflict between traffic exiting Ashton Manor and the proposed development.
- That the speed of traffic approaching from the east on the R445 will likely be reduced by the ramped pedestrian crossing and the revised layout of the roundabout.
- The provision of controlled pedestrian crossings to the R445 will significantly improve pedestrian and cycle facilities.
- The existing access arrangements from the site to the R445 are unsatisfactory, confusing for drivers and dangerous for pedestrians and

cyclists. That the improvement works proposed to the R445 and the new roundabout with pedestrian and cycle facilities will significantly improve vehicular and pedestrian safety in the vicinity of the site even allowing for the additional traffic flows generated by the proposed additional housing.

6.3. Planning Authority Response

No record of a response being received from the Planning Authority.

6.4. Further Responses

No record of a response being received from third party appellants relating to other third party appeals or first party appeal.

7.0 Assessment

7.1. The following are considered to be the main issues arising in the assessment of the subject appeal:

- Principle of development, land use zoning and legal issues,
- Site design, layout and impact on residential amenity,
- Site servicing,
- Traffic access and parking
- Appropriate assessment,
- Other issues

7.2. Principle of Development, Land Use Zoning, Density and Legal Issues,

7.2.1. The appeal lands are zoned Residential 1 under the provisions of the Portlaoise LAP 2012-2018 with the objective to protect and enhance the amenity of developed residential communities. The purpose of the zoning states that within this zoning

category the improved quality of existing residential areas will be the Council's priority. Dwellings and crèches are both identified as land uses that would be normally permissible on lands zoned Residential 1. The principle of the proposed land uses are therefore considered to be acceptable subject to the amenity of existing residential properties not being adversely impacted.

7.2.2. The impact of the development on existing residential amenity is considered in more detail in following sections, however in my opinion the nature of the appeal site comprising an unfinished residential development is such that significant weight has to be given to the fact that the proposed development would result in the completion of the overall development and the availability of public amenity areas to serve the overall development. The existing condition of the site is not particularly poor and the undeveloped areas have been graded and fenced off such that they are not resulting in a hazard however the completion of the development would result in clear benefits for overall residential amenity arising from improved visual and recreational amenity for existing residents.

7.2.3. I note the issue raised by the appellant from Ashton Manor to the west of the appeal site with regard to the lack of detail relating to the **house type A2** as included in the plans received by the Planning Authority on 22nd September, 2017. I note the fact that the first party has submitted plans for the proposed dwelling type A2 as part of the response submission made to the third party appeals. These plans are considered to be acceptable in terms of compliance with the provisions of the Planning and Development Regulations and are in my opinion such as to enable an assessment of the proposed development to be made by the Board. I do not therefore consider that there is any omission that prevents the Board from determining the appeal. The validity of the application in the first instance is, in my opinion, a matter between the planning authority and the appellant. I note the precedent case cited by the third party appellant (ABP Ref. PL11.247804) which relates to the retention and completion of an agricultural structure in County Laois. In my opinion however the circumstances of this cited case are different from the subject appeal in that it related to an application for retention where there were clear discrepancies between the submitted drawings and the siting and scale of the structure for retention and where these discrepancies directly impacted on third party

lands. For these reasons I do not consider that it follows that the Board is precluded from determining the current appeal.

- 7.2.4. With regard to **density**, the third party appellants contend that the proposed overall density of the development at 28 units per ha. gross density is too high and inappropriate for an established residential location. Section 5 of the Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities indicates that for outer suburban locations in cities and larger towns such as Portlaoise a density of 35-50 units per ha. is appropriate. The location of the appeal site within 1km of the town centre is in my opinion such that it is an inner suburban location and therefore in the normal course a case can be made that the appropriate density is at the higher end of this range. Portlaoise also has a mainline rail connection which would potentially justify increased densities however the entrance of the development to the R445 is located c.1.2km from the railway station and therefore outside of the 1km specified in paragraph 5.8 of the guidelines. Regard has to be had to the existing partially developed nature of the development and to the constraints that this proposes in terms of layout.
- 7.2.5. The revisions proposed by the first party in response to the request for further information has resulted in a reduction in the number of units from 141 no. to 137 no. The gross density of the overall Rockview development is therefore c.28 units per ha. or approximately 31 units per ha. net density when account is taken of the crèche site and is therefore below the 35 units per ha. minimum specified in the development plan and the Sustainable Residential Development Guidelines. I note however that the proposed density is higher than the c.25 units per ha. gross / c.28 units per ha. net permitted by the Board in 2006 (Ref. 06/1139; PL11.222247) which was partially implemented and which has significantly influenced the options for completion of the development. Given the limitations placed on the final layout arising from the existing dwellings, roads and services on site the degree by which the recommended density is missed is considered to be justified and an overall net density of 31 units per ha. to be acceptable in this instance.
- 7.2.6. I note that there is reference to a drawing titled Existing Ground Levels and Proposed Floor Levels (Drg. No. 16091-101) in the response to further information submission made by the applicant to the Planning Authority. A copy of this drawing is not available on file and was requested from the Planning Authority. The Planning

Authority have replied (e mail on file) to state that there is no record of such a drawing being received. It is therefore proposed to proceed with the assessment of the appeal.

7.3. Site Design, Layout and Impact on Residential Amenity,

- 7.3.1. Consideration of the layout of the proposed development obviously has to be in the context of a partially completed development. The existing road layout as completed and the existing services within the site place a number of limitations on the layout that is feasible for the balance of the site and the Design Statement submitted by the first party sets out the rationale for the proposed layout. The design approach has sought to reduce the very linear layout that was previously permitted under Ref. PL11.222247 and to develop a layout that meets the requirements of DMURS which was produced since the previous grant of permission in 2006.
- 7.3.2. The basic layout followed is a mixture of a dendritic and open layout with a series of cul de sacs and homezones created. Given the existing residential development, the amount of new roads is relatively limited and the layout is dictated by the linear site boundary at the west and north western side. The orthogonal layout proposed is in my opinion appropriate given the existing constraints in the form of existing development and road layout and the site boundaries. In terms of compliance with DMURS, the carriageway widths at 5.5 metres generally are acceptable and the design of homezones are also considered to be acceptable with a general width of 6.0 metres with a reduced width of 4.8 metres at the entrance to these shared surface areas. As part of the request for further information issued by the Planning Authority the applicant was requested to provide further clarification regarding compliance with DMURS, particularly with regard to the length of streets, achievement of the stated design speed of 20 km/hr and the arrangements for the access. Two of the new streets in the western part of the development do exceed the general maximum length of 10 metres specified in DMURS however in both cases these sections are punctuated by junctions with other streets or homezones and are considered to be acceptable.
- 7.3.3. The design of the residential units comprises a mixture of terraced, semi detached and detached units and the basic housing format and designs proposed are in my

opinion consistent with the existing development and generally acceptable. Internal room sizes and floor areas for the units as proposed in the response to further information are set out in a revised schedule of accommodation received by the Planning Authority on 22 September, 2017. These unit sizes, room sizes and internal layouts are considered to be acceptable.

- 7.3.4. Private open space in the form of private rear gardens are proposed for all units. The size of these private amenity spaces varies, however in all cases a minimum of 80 sq. metres for four bedroom units and 60 sq. metres for two and three bedroom units is achieved. The amount of private amenity space proposed is considered to be acceptable.
- 7.3.5. As per the revised layout submitted as further information, the amount of public open space within the development has been revised to comprise a total of 9,530 sq. metres which equates to c. 11.8 percent of the overall site area. In terms of compliance with development plan standards, a minimum of 10 percent is required and this is met in the revised layout. I would have some issues with regard to the allocation of open space throughout the development and the amenity value of some spaces. In particular, Open Space Area No.6 at the far southern end of the site comprises an infill space between existing completed dwellings and the design of the proposed dwellings to the north (Nos. 60-63) are such that there would not be any overlooking or passive surveillance of this space. I note the comments of the first party regarding the allocation of open space throughout the development and specifically the fact that open space area No.6 has to be retained as open space due to the presence of services in this area. From the services layout drawings and the response to further information submitted it is unclear exactly what is the limitation on the development of residential units in this area. In the event that it is not possible to develop houses on this part of the site in future phases of development, it is recommended that the layout of units Nos. 58-65 would be revised such that units would be re orientated to face open space area No.6 and that passive surveillance of this space would be improved.
- 7.3.6. As part of their response to the request for further information issued by the Planning Authority, and the submissions from objectors, the first party revised the proposals for the crèche to change to a smaller single storey building with the floor area reduced from 358 sq. metres to 150 sq. metres and a revised capacity of c. 44

children. The first party also undertook a detailed survey of existing childcare facilities in the vicinity of the site and these are detailed on page 3 of the response to further information submitted to the Planning Authority. The results of the survey submitted by the first party indicates that 60% of the 14 no. crèche operations contacted have capacity and it is submitted that this, together with the closure of a crèche in the town centre indicates over provision of crèche facilities and a justification for the reduced scale of crèche proposed. On the basis of the information presented I consider that the scale of crèche proposed is appropriate for the development and the extent of existing facilities available in the vicinity. The first party state that in the event that the Planning Authority consider that a crèche facility is not justified that this part of the development could be omitted and replaced with residential units. On the basis of the information presented I do not consider that this is appropriate and that, notwithstanding the availability of spaces at a number of other childcare operators in the town that it is desirable that some childcare facility would be provided for within the development.

- 7.3.7. The further information submission proposed a reduction in the size and capacity of the crèche with a single storey building now proposed with a reduction in floor area from 358 sq. metres to 150 sq. metres. Capacity of the revised crèche layout is proposed to be c. 44 children. In my opinion the single storey design and layout of the crèche is a significant improvement over the original proposal and is acceptable in visual terms and its integration with the rest of the development.
- 7.3.8. A number of specific issues with regard to residential amenity have been raised in the appeal submissions. Specifically, the resident of No.2 Ashton Manor to the north west of the site contends that the boundary between their property and the proposed new houses in the Rockview development is unclear. The area in question comprises the boundary between No.2 Ashton Manor and house No.1 within the proposed development. The levels in this area are such that the existing dwellings in Ashton Manor, notably No.2, are at a higher level than the proposed new dwellings in the development. The issue raised in the appeal related to the proximity of the proposed new development to No.2 Ashton Manor in this location and also to the lack of detail regarding the area between the existing and proposed dwellings and the treatment of the slope and change in levels. Regarding the separation, the revised layout submitted as part of the response to further information indicates the

originally proposed pair of semi detached dwellings in this location replaced by a detached two storey house (type A2). The separation between the two storey side gable of this proposed A2 house and the rear of the existing dwelling at No.2 Ashton Manor is c.16 metres and is in my opinion such that no issues of loss of amenity or overlooking would arise. With regard to the treatment of the area between the existing and proposed dwellings in this location, Drg. 16091-202 includes a cross section of this area which appears to be at a scale of 1:50 and additional details are provided in the first party response to the grounds of appeal. The submitted cross section indicates the existing boundary to No.2 Ashton Manor and the ground level on the site side of the boundary being retained for a distance of approximately 3.5 metres into the site and the construction of a retaining wall of maximum height 1.5 metres at this location to step levels down to site No.1 in the proposed development. On the basis of the information presented I do not consider that the proposed layout would have any adverse impacts on the property of the appellant at No.2 Ashton Manor and that the impact on site No.1 is also acceptable.

- 7.3.9. The appeal submitted by the Rockfield Residents Association highlight concerns regarding the impact of development to the rear of Nos. 1-5 Rockfield Green in terms of overlooking and also the potential impact on the stability of the retaining wall located at the rear of these properties. In response to these issues, the first party response to the further information request states that there are not intended to be any structural works at or near to this wall. The rear gardens of the 8 no. new dwellings (Nos 27-34) to be located to the rear of Nos.1-5 Rockfield Green are proposed to be terraced so that no works to the retaining wall is required. Drawing No.16019-401 submitted as part of the first party response to the grounds of appeal provides two sections across the rear gardens of the proposed houses and these indicate that there would be a drop of between 1.1 and 1.5 metres from the level of the patio to the lower garden level with a further c.500-600mm drop to a final lower level at the rear of the garden. These changes in levels would clearly impact on the amenity of the rear gardens to Nos.27-34, 4 out of 8 of which it is noted are proposed to be Part V units. In addition, I note that the ground level as indicated on Drg. No.16019-401 submitted as part of the first party response to the grounds of appeal is different to that shown in section 5-5 on the architects drawing AI13. Specifically, Drg. AI13 indicates that the existing ground level to the west of the

retaining wall in this area is c.1.75 metres higher than the existing gardens to Nos. 1-5 Rockfield Green. From observations of the site it would appear that the situation indicated in Drg. F113 is more reflective of the existing situation on the ground and in my opinion the apparent discrepancies in this area require clarification before a decision is made. Finally on the issue of residential amenity in this part of the site, I note that Drg. F113 shows the erection of a two metre high rear fence to the rear of the new properties at 27-34 which would further raise the height of the rear boundary wall in Nos. 1-6 Rockfield Green impacting on outlook from the rear of these properties and the availability of light to the rear gardens.

7.3.10. The third party appellants have raised issues with regard to the location and layout of the proposed social housing to be provided to the local authority in accordance with the requirements of Part V of the Planning and Development Act. Specifically, it is contended by the appellants that, when combined with the existing Part V housing in the completed part of the development, that the location of these units are excessively concentrated in one part of the estate. In response, the first party has stated that the proposed social units are to be located in five separate clusters throughout the site. While the proposed social units are proposed to be relatively close to one another, I would agree with the first party that they are located in five distinct locations or six locations once the existing six units are included. In total, 16 of the existing and proposed Part V units would be located in a relatively small area at the south west corner of the site however they are not contiguous to one another and are interspersed with other private housing in this area. Ideally, the Part V housing could be spread more evenly throughout the site however a compromise between pepper potting of units and efficiencies for management of the units by the local authority has to be struck. I also note that it is not the case that the issue of Part V agreement remains unresolved in this case, rather the unit types and locations proposed for transfer have been accepted by Laois County Council and in these circumstances I do not see that there is a clear role for the Board to direct the local authority to accept different units within the development. On balance therefore it is my opinion that the location of the units proposed for transfer to the local authority under Part V are not excessively clustered within the development and is acceptable.

7.4. Site Servicing

- 7.4.1. The additional residential units included in the current application are proposed to be connected to the existing water, wastewater and surface water drainage systems. As part of the request for further information, the planning authority requested that the applicant would submit the confirmations sought by Irish Water in their initial report to the planning authority that suitable water and waste water services can be provided to serve the proposed development. As part of the response to this request, the applicant submitted a response received from Irish Water to a pre connection enquiry. This response states that Portlaoise currently has limited availability of potable water available with upgrade works proposed. The response goes on to state that *'until such time as these upgrades are complete the whole development won't be able to be accommodated. A Phased development is possible with Phase 1 of 23 units feasible for connection at this time'*.
- 7.4.2. This response raises a number of issues. Firstly, the decision of the Planning Authority is to grant permission for the entire development of 137 no units. Condition No.4 attached to that decision does require that prior to the commencement of any development, the applicant is to sign a connection agreement with Irish Water and that the connections to the Irish Water network will be subject to the constraints of the capital investment programme. Condition 2 requires the submission of a phasing plan prior to the commencement of development however this plan is not specifically related to infrastructure availability. The submission received from Irish Water does not set out the nature of the existing capacity constraints that impact on available water supply in Portlaoise and review of the Irish Water website does not indicate specific projects. No reference is made in the submission to specific upgrade projects required or to a timeline within which infrastructure constraints would be expected to be addressed. The Irish Water website does make reference to watermain rehabilitation works being completed in Portlaoise however there are no upgrade works in the town listed as 'in progress'. Similarly, the Irish Water Water Services Strategic Plan, October 2015 makes reference to Portlaoise being included in the EPA remedial action list for water projects (see Appendix A of the Plan) however no indication is provided regarding the nature or a timeline for any such works.

- 7.4.3. The report of the Planning Officer and the Drainage and Water Supply report submitted with the application and the engineering report addressing the further information request do not provide any information with regard to upgrading works impacting on water supply in the town. No report was received from the Water Services section of the council prior to the issuing of a decision by the Planning Authority.
- 7.4.4. In view of the very significant restriction proposed by Irish Water on the number of residential units that can be permitted, the absence of any available information regarding the nature of the constraint on the existing water supply, the status of improvement works and whether contracts for these works have been signed and information on a likely timeline within which works might occur, it is in my opinion premature that permission would be granted. It is therefore recommended that permission would be refused for reasons relating to inadequate water supply to serve the proposed development and prematurity pending the resolution of these constraints. Alternatively, the Board may wish to seek further information from Irish Water regarding the nature of the existing water supply constraints and the timeline for resolution of these issues.
- 7.4.5. The response to the pre connection enquiry received from Irish Water relating to waste water indicates that there is adequate capacity available to serve the proposed development. The proposed development would connect to the existing estate drainage network and the proposals submitted with regard to foul drainage are therefore considered to be acceptable.
- 7.4.6. With regard to surface water, the applicant was requested to provide additional proposals for on site attenuation, design calculations and clarification regarding the discharge point for surface water as part of the request for further information issued by the Planning Authority. Surface water will only be discharged via one location which is to the existing surface water sewer on the R445 and design calculations have been submitted. The surface water system has been designed to restrict the discharge to a peak rate of 18 l/sec. which is above the 7 l/sec. normal standard under the Greater Dublin Strategic Drainage Study. Details of the proposed system are provided in the Report on Drainage and Water Supply submitted as part of the further information response, received by the Planning Authority on 22 September, 2017. Given variability in ground permeability it is proposed that infiltration to ground

would only be used by way of permeable paving to driveways with all other surface water discharged to the storm water system. The proposed discharge rate and the use of underground attenuation without any on ground SUDS swales or wetlands is considered to be acceptable by the Planning Authority. A climate factor of 10 percent has been applied to all calculations which is considered to be appropriate. Overall, given the requirement to connect into existing infrastructure and existing use of underground storage on site, it is considered that the proposals for surface water disposal are acceptable.

- 7.4.7. It is noted that the appeal site is located outside of the areas of flood potential as indicated on Map 3 of the Portlaoise LAP, 2012-2018. These identified areas appear to correspond relatively closely with the OPW Draft Flood Risk areas and the appeal site is not located close to any areas identified as a flood risk. There are no recorded incidents of flooding within or in close proximity to the appeal site on the Floodmaps.ie website. No site specific flood risk assessment was submitted with the application and the assessment as contained in the Planning Report submitted with the application only makes reference to the fact that the site is located outside of the flood risk zone identified in the LAP. It would have been preferable that a site specific assessment would have been undertaken for the site, particularly given the proposed limited use of permeable surfaces and the significant contours on the site. On the basis of the available information however it is not considered likely that flooding will be a significant issue were permission to be granted for the completion of the development of the site.

7.5. Traffic Access and Parking

- 7.5.1. The road layout is influenced to a very significant degree by the existing developed nature of the site. In particular, the road layout is dictated by the existing access and the estate road and associated residential development along the eastern and southern boundary of the site.
- 7.5.2. With regard to compatibility with DMURS, the planning authority requested details as part of the further information request regarding the compatibility of the proposed layout with DMURS principles. Section 3.4.1 of DMURS advocates that a dendritic network would not be used for residential areas as the use of cul de sacs prevents

permeability. The proposed layout does incorporate a number of short cul de sac areas, however these are identified as homezones and do not generally access more than 10 no. units. In addition, a number of these identified homezones, notably nos. 1, 2, 4 and 5 are actually through routes for vehicular traffic. Overall, it is my opinion that the level of permeability within the layout is acceptable and appropriate for this location and is consistent with DMURS principles. Road widths at 5.5 metres with 6 metre carriageways within homezones are also considered to be consistent with DMURS principles. The layout does lead to the creation of additional cul de sacs at the north western end of the site and consideration could be given to the connection of these two roads to increase permeability. Currently no pedestrian access is provided for at this location.

- 7.5.3. Parking on site was revised in the further information response to provide a total of 310 no. spaces. Each house has 2 no. parking spaces with 18 no. visitor spaces and 16 no. spaces for the crèche. Plan No. AI02 indicates the allocation of car parking spaces throughout the site as requested by the Planning Authority in the further information request. The parking provision is consistent with the requirements of the LAP, Tables 14 and 15 and is considered to be acceptable.
- 7.5.4. The Planning Authority raised concerns with regard to the site access arrangements notwithstanding the proposed revision to move the access point to the west and further away from the existing roundabout at the north east corner of the site. The existing access arrangements are poor with the access point being almost onto the existing roundabout but with an offset such that traffic turning right has to cross a continuous white line leading into the roundabout. The revised access arrangement with the access point onto the R445 at the far north west of the site are a significant improvement and the applicant has demonstrated that sight lines at the entrance would be compatible with DMURS requirements. In terms of capacity, the revised design for the roundabout was the subject of traffic assessment submitted in the Report on Traffic and Transportation. These indicate that the revised layout with the relocated site access and revisions to the roundabout would result in the maximum ratio of flow to capacities being slightly reduced from existing levels due to a more efficient junction layout with conflicts with roundabout traffic significantly reduced. It is also predicted that the R445 will remain within capacity. On the basis of the information presented it is my opinion that the revised access arrangement to the

site is a significant improvement on the existing layout in terms of safety and reduced conflict with existing traffic and that the impact on the capacity of the R445 and the existing roundabout adjoining the site access is acceptable.

7.5.5. The upgrades proposed to the existing mini roundabout located on the R445 to the north east of the site include the provision of cycle facilities and pedestrian connections across all three arms of the junction as well as cycle facilities are proposed to be provided. These facilities are proposed to be extended to the revised site entrance and pedestrian crossing of road provided between new site access and roundabout. A pedestrian access point is proposed to be retained at the original site access point. The third party appellants have questioned the appropriateness of the proposed new site access with a simple priority junction however on the basis of the traffic assessment undertaken I consider that the design proposed is acceptable, will not result in any increase in congestion at the access junction and is a significant improvement in terms of pedestrian and vehicular safety relative to the existing site access. Similarly, it is my opinion that the proposed new roundabout and pedestrian and cycle facilities proposed are acceptable. The radius of the roundabout is proposed to be significantly increased from the existing mini roundabout layout however the diameter proposed at c.7 metres is consistent with DMURS requirements, (DMURS section 4.4.3).

7.5.6. I note that Condition No.23 of the Notification of Decision to Grant Permission issued by the Planning Authority requires the works to the proposed roundabout to be completed prior to the commencement of any other development. The implementation of the proposed upgrade works will also require the relocation of the site entrance and associated works. Given the restrictions on the number of units which can be accommodated due to capacity issues with the water supply it would appear unlikely that it would be economic for these works to be undertaken in advance of the commencement of any other development. This would be the case notwithstanding the apportionment of the costs of the road upgrade which is the subject of the first party appeal and which is discussed further below. The sub standard nature of the existing access is however in my opinion such that the number of additional units which should be permitted prior to the implementation of the road upgrade is very limited. In the event of a grant of permission either now or

in a future application the provision of the road upgrade would need to be the subject of agreement as part of the phasing of the overall development.

- 7.5.7. The wording of Condition No.23 and specifically the requirement that these works would be undertaken at the expense of the developer is the subject of appeal by the first party. What is stated by the first party is that the proposed upgrading works to the roundabout and the improvement in pedestrian and cycle facilities would be of significant benefit to the wider population as well as the future residents of the Rockview estate and as such the cost of the works should be apportioned between the local authority and the developer. I would agree that significant benefits for the wider community would arise from the proposed works, including improvements in pedestrian safety for school related traffic as well as improvements in vehicular and cyclist safety. For this reason I consider that the proposed rewording of Condition No.23 as suggested by the first party with the inclusion of a sub paragraph 23(d) which states that the mechanism for agreeing costs and the apportionment of these costs between the local authority and the developer shall be the subject of agreement or failing agreement shall be determined by the Board is acceptable and should be included in any grant of permission that may be issued. In the event that permission is refused for this application and a subsequent application submitted, additional detail regarding overall costs of the proposed works could be provided and an opportunity afforded for discussions between the local authority and the development regarding costs to be undertaken.

7.6. **Appropriate Assessment**

- 7.6.1. The appeal site is not located in or immediately adjacent to any European site. The closest sites to the proposed development are the River Barrow and River Nore SAC site which is located c. 9km to the east and to the south west of the appeal site at the closest point and the Slieve Bloom Mountains SPA site which is located c.8km to the west at the closest point.
- 7.6.2. The nature of the proposed development is such that the foul drainage and surface water emissions are proposed to be connected to the existing foul drainage system and to be treated at the Portlaoise waste water treatment plant. On the basis of the information provided by Irish Water the existing treatment plant has capacity to cater for the proposed development. The surface water system is proposed to

accommodate additional on site attenuation and to discharge to the surface water drainage system in the public road rather than open drains.

7.6.3. The only potential pathway between the appeal site and a European site which would result in potential impacts on any European site arises from the proximity of the site to the Triogue River which is a tributary of the River Barrow. The distance from the site to the closest part of the River Barrow SAC is however c.8km. The potential for impacts arise from construction activity on site and the works required to re contour the site to accommodate the proposed development. Subject to good on site practices the potential for the mobilisation of sediment should be capable of being minimised and any grant of permission would likely be the subject of a construction and environmental management plan which would require the drafting of and adherence to good on site construction practice with the aim of minimising emissions including sediment of other contaminants.

7.6.4. The following are the qualifying interests of the River Barrow and River Nore SAC site:

- Desmoulin's whorl snail *Vertigo moulinsiana*
- Freshwater pearl mussel *Margaritifera margaritifera*
- White-clawed crayfish *Austropotamobius pallipes*
- Sea lamprey *Petromyzon marinus*
- Brook lamprey *Lampetra planeri*
- River lamprey *Lampetra fluviatilis*
- Twaite shad *Alosa fallax*
- Atlantic salmon (*Salmo salar*) (only in fresh water)
- Estuaries
- Mudflats and sandflats not covered by seawater at low tide
- *Salicornia* and other annuals colonizing mud and sand
- Atlantic salt meadows (*Glauco-Puccinellietalia maritimae*)
- Otter *Lutra lutra*

- Mediterranean salt meadows (*Juncetalia maritimi*)
- Killarney fern *Trichomanes speciosum*
- Nore freshwater pearl mussel *Margaritifera durrovensis*
- Water courses of plain to montane levels with the *Ranunculion fluitantis* and
- *Callitriche-Batrachion* vegetation
- European dry heaths
- Hydrophilous tall herb fringe communities of plains and of the montane to
- alpine levels
- Petrifying springs with tufa formation (*Cratoneurion*)
- Old sessile oak woods with *Ilex* and *Blechnum* in the British Isles
- Alluvial forests with *Alnus glutinosa* and *Fraxinus excelsior* (*Alno-Padion*,
- *Alnion incanae*, *Salicion albae*)

The conservation objectives for the site are site specific, dating from July 2011 and require the restoration and or maintenance at favourable conservation status of the above habitats and species. A number of the species listed are clearly vulnerable to sedimentation notably the freshwater mussel and to a lesser extent salmon, crayfish and lamprey species. It is noted that for the freshwater mussel species the conservation objectives indicate that the status as a qualifying interest is currently under review. I also note from the conservation objective that the freshwater mussel populations have not reproduced in the River Nore system for many years leading to the current review and also that the Nore freshwater mussel is confined to a catchment in the upper River Nore and hence is not located within the part of the catchment closest to the appeal site.

- 7.6.5. The location of the site is such that there would not be any direct habitat loss arising from the proposed development. The location of the site relative to the Triogue River is such that there is no direct pathway from the site to this watercourse and this separation, together with the c. 9km separation between the site and the closest part of the SAC site are such that it is not considered likely that any significant effects on qualifying interests would arise as a result of a reduction in water quality.

7.6.6. In conclusion, the project has been screened for appropriate assessment and it is concluded that the proposed development is not likely to have significant effects on the River Barrow and River Nore SAC site (site code 002162) in the light of its conservation objectives.

7.7. Conclusion

7.7.1. In conclusion, the proposed development comprises the completion of an existing unfinished residential estate in a location conveniently located relative to the centre of Portlaoise. The existing estate while unfinished is in a good condition, however the proposed development would clearly result in an overall significant improvement in the visual and residential amenities of the estate for existing residents.

7.7.2. While the extent of existing development and the existing completed residential layout result in a number of limitations on the options for completion of the development it is considered that the proposed development is of a density that, while lower than that specified in the Sustainable Residential Development Guidelines can be justified having regard to the circumstances of the site. It is also my opinion that the proposed layout would, subject to some revisions in the vicinity of open space area No.6, generally result in a good level of residential amenity and a development that is consistent with the Sustainable Residential Development Guidelines and with DMURS.

7.7.3. The works to the site access and the proposed upgrading of the roundabout to the north east of the site on the R445 are considered to be necessary to facilitate the proposed additional residential development on the site and to ensure pedestrian and traffic safety. Such works are required to be undertaken at an early phase of the overall development.

7.7.4. Servicing of the site in terms of foul drainage and surface water is considered to be acceptable subject to conditions however I note the issues raised by Irish Water regarding capacity constraints regarding water supply and the recommendation that only 23 out of the proposed 137 no. units can be accommodated in Phase 1. From the information on file including internal reports, first party submissions, Irish Water submissions and available information on the Irish Water website I am not able to deduce the nature of the water supply constraints impacting on the site, the nature and status of the upgrades required and the likely timeline for these works. Given

this, and having regard to the very restricted number of dwellings to be catered for in Phase 1 and what I consider to be the necessity that the site access would be upgraded prior to additional units being permitted, it is my opinion that the proposed development is premature and that refusal of permission is warranted.

8.0 Recommendation

8.1. That permission be refused based on the following reasons and considerations:

9.0 Reasons and Considerations

1. Having regard to the limited availability of water supply to serve the proposed development, to the limited number of houses that can be accommodated relative to the overall development proposed and to the lack of information regarding the upgrading works required to facilitate the proposed development, the status of any such works and the likely timeline for resolution of the issues, it is considered that the proposed development is premature and would be contrary to the proper planning and sustainable development of the area.

Stephen Kay
Planning Inspector

13 April 2018