

Inspector's Report ABP-301119-18

Development 17 no. dwellings, playground, playing

pitch and associated works.

Location Drumbear Wood, Drumbear,

Monaghan.

Planning Authority Monaghan County Council

Planning Authority Reg. Ref. 17/310

Applicant(s) Drumbear Developments Limited.

Type of Application Permission.

Planning Authority Decision Grant.

Type of Appeal Third Party

Appellant(s) Drumbear Wood Residents

Association.

Observer(s) None.

Date of Site Inspection 1st November and 4th December 2018.

Inspector Karen Kenny

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1.0 Site Location and Description

1.1. The appeal site is located c. 1.5 km to the south of Monaghan town centre. The site comprises the Drumbear Wood housing estate, an established housing estate with a mixture of detached, semi-detached and terraced houses and duplex units. The development is access via a single entrance from the R188 (Monaghan to Cootehill) regional road. The application relates to an unfished / undeveloped area of land in the eastern section of the site and to a green area located centrally within the development. The undeveloped area is currently enclosed with a timber fence and is overgrown.

2.0 **Proposed Development**

2.1. Permission is sought for the construction of 17 no. two storey dwellings in an area of undeveloped land and for the development of a playground and a playing pitch on an existing public open space.

3.0 Planning Authority Decision

3.1. **Decision**

Grant permission subject to conditions. The following conditions are of note:

• Condition no. 6 relates to the vehicular entrance. Condition no. 6 (a) requires alterations to the vehicular entrance to achieve sightlines of 49 metres at a setback of 2.4 metres from the road edge and a level surface within the visibility splay. Condition no. 6 (b) states that where it is necessary to remove hedges, walls, fences, embankments or other obstructions to achieve the required visibility splays, they shall be reinstated behind the visibility splays. Condition no. 6 (c) states that the new entrance shall form a bellmouth of 4 metres radius with edge of new boundary and that the recessed entrance shall be of sufficient dimensions to contain a stationary vehicle off the public road. Condition no. 6 (d) states that the entrance shall be surfaced with concrete or bitmac from the edge of the public road for a minimum of 5 metres and that the surface shall be graded back so that its level at 3.0 metres from

the edge of the carriageway and is a minimum of 100 mm below road level. The condition states that the gradient of the access road shall be not greater than 1:20 (5.0%) for the first 5 metres from the boundary and 1:10 thereafter. Conditions no. 6 (e) and (f) relate to drainage details.

- Condition no. 10 requires the play area to be completed to a suitable standard prior to the occupation of the dwellings.
- Condition no. 13 requires the recommendations of the Flood Risk Assessment to be implemented in full.

3.2. Planning Authority Reports

3.2.1. Planning Reports

Following initial assessment further information was requested in relation to the site layout, playground and landscaping details, flood risk and water services details. Following the submission of further information, the Report of the Planning Officer concludes that the proposed development is acceptable and recommends that permission is granted.

3.2.2. Other Technical Reports

Housing: No objection.

Water Services: No objection.

Roads: No objection.

3.3. Prescribed Bodies

Irish Water: No objection.

3.4. Third Party Observations

A total of c. 40 third party submissions / observations were received and considered by the Planning Authority. Issues raised are similar to those raised in the grounds of appeal. Additional issues raised include the lack of car parking, flood risk, applicants legal interest in the greenspace and impact of construction traffic.

4.0 **Planning History**

Monaghan County Council Ref. 04/1170 & Monaghan Town Council Ref. 04/30065

Permission approved for a residential development comprising a total of 199 no. dwellings on the appeal site under two separate planning applications. Monaghan Town Council granted permission for 65 no. residential units and a vehicular access from the R188 on the northern section of the site under P.A. Ref. 04/30065, while Monaghan County Council granted permission for 134 dwellings on the southern section of the site under P.A. Ref. 04/1170.

Monaghan County Council Ref. 06/1850:

Permission granted by the Planning Authority for change of house type and the addition of 1 no. unit. A first party appeal in respect of this decision (ABP Ref. 221806) was subsequently withdrawn.

ABP Ref. 224901 / Monaghan County Council Ref. 07/402

Permission refused by the Planning Authority for change of house types from 12 no. semi-detached and detached houses to 24 no. duplex units on a site in the south west corner of the development. The decision was the subject of a first party appeal. An Bord Pleanála refused permission on appeal for two reasons that related to private / communal open space provision and the design of the scheme.

Monaghan County Council Ref. 10/305

Permission granted by the Planning Authority for 12 new 3-storey houses in the south west corner of the development. An extension of duration for this permission was granted in 2015 under P.A. Ref. 15/9010.

Monaghan County Council Ref. 10/363

Permission granted by the Planning Authority for 2 no. additional semi-detached houses in the south west corner of the development.

ABP Ref. PL72.242580 / Monaghan Town Council Ref. 13/30015

Application for modifications to the vehicular entrance from the R188 to reduce sight visibility splays in accordance with revised standards detailed in the Design Manual for Urban Roads and Streets Guidelines (DMURS), which would in effect revise the

requirements of Condition no. 16 a (ii) of the parent permission (MTC Ref. 04/65). Permission refused by the Planning Authority. The decision was subject to a first party appeal to An Bord Pleanála. An Bord Pleanála refused permission on appeal for one no. reason as follows:

1. Having regard to the location of the site at a priority junction between an arterial/link road (R188) and a local road within the 50 km/h speed limit zone, to the traffic characteristics on the arterial link road including traffic volume, design speed and limitations on forward visibility and sightlines and to the absence of proposals for improvements to the existing R188 and limited application of the principles set out in (DMURS) within the boundary of the application site, the Board is not satisfied, based on the information presented, that the proposed development would comprise the application of the DMURS principles in a comprehensive or integrated manner as promoted in the Guidelines. It is considered that to permit the proposed works to the junction and the application of a reduced sight stopping distance as provided in DMURS without the application of any of the other design principles set out in the Guidelines that seek to influence driver behaviour would not result in an improvement in traffic safety, would be contrary to the provisions of DMURS and would, therefore, be contrary to the proper planning and sustainable development of the area.

P.A. Ref. 17/338

Permission refused by the Planning Authority for 1 no. detached dwelling on open space at the end of a row of 20 no. semi-detached dwellings. The reasons for refusal stated that the development is out of character with the permitted dwellings, would result in loss of public open space and contravene a condition of the original permission, which omitted the dwelling at this location.

5.0 Policy Context

5.1. Development Plan

The Monaghan County Development Plan 2013-2019 is the relevant statutory plan for the area. The following sections are considered to be relevant:

- The Monaghan Town Development Plan is contained in Chapter 9 of the County Development Plan. The site is zoned "existing residential" with an objective to "protect and improve existing residential amenity" (Map MDP1 Monaghan Town refers).
- Chapter 15 Development Management Guidelines. Section 15.3 relates to Housing Developments.

Policy HDP 2: All planning applications for housing developments shall have regard to the standards set out in the DEHLG publication Sustainable Residential Developments in Urban Areas - Guidelines for Planning Authorities (May 2009), the DEHLG publication Urban Design Manual – A Best Practice (May 2009) and the DEHLG publication Sustainable Urban Housing: Design Standards for New

Policy HDP 3: All housing developments shall be constructed in accordance with DEHLG Recommendations for Site Development Works for Housing Areas (1998), Monaghan County Council Water Services Technical Guidance Document (2008) (or other such publications as specified by Monaghan Local Authorities), and the National Roads Authority Specification for Road Works (March 2000).

Apartments (September 2007).

Policy HDP 4: All planning applications for housing developments shall comply with the Roads and Access Standards set out in Chapter 15, Development Management Guidelines, Monaghan County Development Plan 2013-2019.

Policy HDP 5: All proposals for residential development shall respect the character of the surrounding area and the amenities of neighbouring properties.

Policy HDP 7: All proposals for residential development shall provide appropriate recreational facilities such as open spaces, formal play areas, playing pitches, all weather surfaces,

changing facilities, etc. The nature and scale of recreational provision should be reflective of the scale of the residential development proposed and should comply with Table 15.1 in Chapter 15 of the Monaghan County Development Plan 2013-2019. Table 15.1 requires all housing developments on greenfield land to provide public open space at a rate of 15% of the overall site area. Developments of over 40 no. units require formal play provision. Developments of over 150 no. units require a playing pitch.

5.2. Natural Heritage Designations

None.

6.0 **The Appeal**

6.1. Grounds of Appeal

A third-party appeal has been received from the Drumbear Woods Residents Association. The grounds of appeal can be summarised as follows:

- The level of housing development proposed in the estate was not expected by residents. 15 no. additional units have already been permitted since the original permission. The subject application would add another 17 no. units.
- Public open space provision is below the Development Plan standard of 15%.
 The applicants reference to 10,724 square metres of public open space is
 overstated. This would appear to include an area of land along the road
 frontage, which is steeply sloped and should not be included. The usable
 public open space is 4450 sq. metres or 6.7% of the site area, comprising a
 central green (c. 3150 sq.m) and a smaller area to the south (c. 1300 sq.m).
- The proposed development seeks to eliminate an existing public open space and to replace this with a playground and playing field.

- The proposed facilities would attract wider community use and would result in disturbance and nuisance due to increased noise, pedestrian traffic, vehicular traffic and car parking. There has been no consultation in relation to the management of the play area.
- The development would increase the use of the single vehicular entrance and add to congestion at this entrance. Residents currently experience delays and congestion in the mornings, with delays to exit onto the main road and issues with incoming cars blocking those exiting. During winter months the steep slope at the entrance causes further issues with entering and exiting. The speed limit on the main road is not generally observed leading to dangerous conditions for drivers and pedestrians.
- Increased through traffic will increase danger to residents entering and existing their driveways.
- Sightlines to proposed driveways appear inadequate.
- The dwellings will have a significant impact on the amenity of houses no. 69
 and 70 due to loss of privacy and they will be overlooked to front and back.
- The layout is not in keeping with the aesthetics of the estate.

6.2. Applicant Response

A response has been received from Managhan Town Planners on behalf of the applicant. The response can be summarised as follows:

• The applicant states that the level of development was not expected or anticipated by existing residents. The claim of an increase on what was originally approved is not correct. Permission was approved in 2004 for 134 no. residential units and 65 residential units on the site under two grants of planning permission. The existing application relates to an area of land where 33 apartments were previously approved. The principle of the development of this site is established through the "existing residential" zoning objective and through a history of successive permissions. The design of development, at 25 no. units per hectare should be the key consideration.

- The total amount of open space complies with the 15% requirement. It is not
 accepted that the area of public open space along the road should be
 excluded from the open space calculation as this area is a lawn bank and is
 easy to walk on.
- The applicant is seeking to formalise the 'central' area of public open space for more active use, as a playground and playing field. It is a requirement of the Development Plan to provide a formal play area and playing pitch in residential developments of between 150 – 200 units and the proposal complies with this requirement.
- It is not accepted that the playground will impact on the amenity of the existing residents. The facilitates are proposed in order to improve the amenity of the existing residents and is located to allow for passive and more formal surveillance.
- The existing vehicular entrance is constructed and in operation. It was
 designed to comply with the guidelines established in the Design Manual for
 Urban Roads and Streets (DMURS) and is capable of accommodating traffic
 from the proposed development.
- Parking spaces for proposed units are designed to comply with the guidelines established in the Design Manual for Urban Roads and Streets (DMURS).
- The layout and siting of the dwellings follows a similar grain, form, massing and orientation to those previously built and are in keeping with the current aesthetic of the estate.
- The proposed development is an appropriate response to a strategically located site and will develop what are currently vacant spaces within the housing estate.

6.3. Planning Authority Response

None.

6.4. Observations

None.

7.0 Assessment

- 7.1. I consider that the main issues in this case are as follows:
 - Planning History and Principle of Development
 - Vehicular Access
 - Design and Layout
 - Public Open Space
 - Flood Risk
 - EIA
 - Appropriate Assessment

7.2. Planning History and Principle of Development

- 7.2.1. In 2004, planning permission was granted for a residential development comprising a total of 199 no. dwellings on the appeal site under two separate planning applications. Monaghan Town Council granted permission for 65 no. residential units within its functional area under P.A. Ref. 04/30065 and Monaghan County Council granted permission for 134 no. residential units in its functional area under P.A. Ref. 04/1170. The development has been subject to a number of amending permissions as detailed in Section 4 above.
- 7.2.2. The current application relates to an unfinished area in the eastern section of the site. The lands were identified for residential development under the original permissions. Permission was granted for 33 no. apartment units in the central area (units 1-33A) and for 4 no. terraced houses (units 65-68) to the east of existing dwelling no. 69. This area was not completed. The lands remain undeveloped and are overgrown and fenced off from the remainder of the development.
- 7.2.3. The proposed development seeks to complete the unfinished area through the provision of 17 no. dwellings and to provide a playground and playing pitch on an existing public open space. The Monaghan County Development Plan 2013-2019 is the relevant statutory plan for the area. The site is zoned "existing residential" with an objective to "protect and improve existing residential amenity". Having regard to

- the pervious grant of permission for housing on the subject lands and to the zoning objective contained in the Development Plan, I am satisfied that residential development and community facilities are acceptable in principle subject to the assessment of the relevant planning issues identified below.
- 7.2.4. I would note that the grounds of appeal argue that the overall number of housing units would be increased over that originally approved. However, the original permission provided for 37 no. units, while the subject application proposes 17 no. units, an overall reduction of 20 no. units.

7.3. Vehicular Access

- 7.3.1. The grounds of appeal argue that the proposed development would increase the use of the existing vehicular access onto the R188. It is argued that the residents already experience delays exiting onto the main road and that there are issues with incoming cars blocking those exiting. It is noted that frost on the steep slope of the access in winter months causes issues. It is also noted that the speed limit (50 k/h) on the main road is not generally observed leading to dangerous conditions for drivers and pedestrians.
- 7.3.2. The site is accessed from the R188 (Cootehill Road) at a location that is within the 50 km/hr speed limit zone on the southern approach to the town. The existing access is a curved access road of c. 40 metres in length that slopes down from the R188 to connect with the internal estate road network. It is c. 6 metres wide, has a 2m footpath on both sides and connects to the estate road network at a T junction. Ground levels between the R188 and the T junction fall away by approximately 6 metres. The curved alignment of the access provides for a reduced gradient on the access road. On the R188, there is a right turn filter lane on the north bound direction at the entrance to the Drumbear Wood estate.
- 7.3.3. Condition 16(a)(ii) of P.A. Ref. 04/65, which is the parent permission for the Drumbear Wood development, requires that an unobstructed sight distance of 95 metres in each direction be provided at the site entrance measured from a position 4.5 metres back from the road edge. The layout of the existing entrance would not appear to comply with this requirement.

- 7.3.4. The applicant sought permission under ABP Ref. PL72.242580 / Monaghan Town Council Ref. 13/15 for alterations to the existing entrance to accord with the reduced forward sight lines set out in the Design Manual for Urban Roads and Streets (DMURS), which was published in 2013 and in effect revise the sight lines required under Condition 16 a (ii) of the parent permission. The applicant argued under this application that a sight line of 65 metres at a distance of 2.5 metres from the road edge would comply with the standards set out in Table 4.2 of DMURS. This was based on an assumption by the applicant that the design speed of the R188 is 60 k/h, as opposed to the posted speed limit of 50 k/h. The council sought a road survey at further information stage to verify the design speed of the R188, however, this was not provided. Permission was refused by the Planning Authority and subsequently refused by An Bord Pleanála on appeal. The reason for refusal states that having regard to the traffic characteristics on the arterial link road (inc. traffic volume, design speed and limitations on forward visibility and sightlines) and the absence of proposals for improvements to the existing R188 to influence driver behaviour, the Board is not satisfied that the proposed development would apply the DMURS principles in a comprehensive or integrated manner and that to permit the proposed works and the reduced sight stopping distance as provided for in DMURS without the application of any of the other design principles set out in the Guidelines (to reduce driver speed) would not result in an improvement in traffic safety and would be contrary to the provisions of DMURS.
- 7.3.5. Under the subject application and appeal the applicant has failed to detail the existing vehicular entrance on the submitted plans and particulars (layout, gradient or visibility) or to address the issues raised under ABP Ref. PL72.242580. This is despite the fact that the entire housing scheme is included within the red line boundary of the site. The District Engineers Report at application stage states that required sight visibility splays are available, while the District Engineers Report following receipt of further information recommends that visibility splays of 95 metres are provided. Condition no. 6 (a) of the notification to grant permission requires alterations to the vehicular entrance to achieve sightlines of 49 metres¹ and a level surface within the visibility splay. Condition's no. 6 (c) and 6 (d) require revisions to

¹ Table 4.2 of DMURS sets a standard sight stopping distance of 49 metres for a 50 kph road and of 65 metres for a 60 kph road.

the design of the existing entrance and to the gradient. These issues were not addressed during the application and it is not clear that these requirements can be met. This condition fails to have regard to the issues raised by the Planning Authority and the Board under the previous application, particularly the concerns in relation to the design speed of the R188. The condition also fails to take account of the overall policy set by Section 4.4.4 of DMURS which sets reduced sight stopping distances within the 60 p/h zone but clearly states that the reduced standards should be applied according to the design speed of the street.

- 7.3.6. I would note that the applicant at further information stage stated that the entrance has been assessed under previous planning applications and deemed appropriate and acceptable under relevant policies. This is clearly not the case. The appeal response states that the site entrance has already been constructed and is operational and that it was designed to comply with the guidelines established in DMURS. Again, the applicant has failed to acknowledge the determination of the Board under ABP Ref. PL72.242580 or to address the issues raised.
- 7.3.7. The Board has previously determined that the application of the reduced sight line standards set out in DMURS should not be applied in isolation at this location without the application of other design principles that would influence driver behaviour on the R188, due to the characteristics of the R188.
- 7.3.8. Given the planning history associated with the existing access and the applicant's failure to (a) provide any details of the existing entrance and (b) to demonstrate that forward visibility and sightlines are acceptable by reference to the characteristics of the adjoining arterial link road (e.g. traffic volume, design speed and alignment), I am of the view that it would not be appropriate to grant permission for a development, that would in effect, intensify the use of this junction. I therefore recommend that permission is refused.

7.4. Design and Layout

7.4.1. The proposed development comprises 12 no. semi-detached dwellings located within a central area of the site and a further 4 no. semi-detached dwellings and 1 no. detached dwelling to the east of dwelling no. 69.

- 7.4.2. The grounds of appeal argue that the dwellings are not in keeping with the overall aesthetic of the estate. The density, design and scale of the development is generally consistent with the character of the existing two storey housing within the estate. I would note that the finished floor levels of dwellings would be set above existing ground level as a flood mitigation measure, as discussed in more detail in Section 7.8 below. It is proposed to sit 8 no. dwellings on a high base or plinth that would be visible from the street and to provide stepped access to these dwellings. The design response is visually imposing in my view and presents a poor interface with the street. This issue could be resolved through redesign and given the substantive reason for refusal in relation to vehicular access, I do not consider it necessary to include an additional reason for refusal in relation to this issue.
- 7.4.3. In terms of the parking layout, I am satisfied that the plots are designed to an acceptable standard and that the car parking spaces are generally in accordance with the standards set out in DMURS.

7.5. Residential Amenity

- 7.5.1. Having regard to the nature and scale of the proposed development and the pattern of development in the area, I am satisfied that the development would not seriously injure the amenities of the area.
- 7.5.2. I would note that a number of dwellings fail to meet the 22 m separation standard between opposing first floor windows. A separation of c. 19.5 metres is provided between proposed dwellings no. 5 and 6 and no. 7 and 8. Section 6.10 of the Sustainable Residential Development Guidelines (DECLG 2009) state that while a 22 m separation distance between opposing above ground floor windows is normally recommended for privacy reasons, this may be impractical and incompatible with infill development. In such cases the Guidelines recommend an innovative approach and flexibility in the interpretation of standards. The applicant's response at further information stage stated that additional screen planting is proposed to negate any privacy concerns. I consider this to be acceptable, having regard to the infill nature of the scheme, within an established housing development.

7.6. Public Open Space

- 7.6.1. Table 15.1 of the Development Plan details standards for public open space provision. A standard of 15% of the site area is required for greenfield sites, which would equate to a requirement of 9900 square metres in this instance, based on the stated site area of 6.6 hectares.
- 7.6.2. The application form states that there is 10,724 square metres of public open space within the development. The appellants argue that the useable open space provision is 4450 square metres or 6.7 % of the site area. It is argued that the grassed area along the road frontage should not be included in the calculation due to its steep slope. The applicant contests this claim, stating that the area along the road is a lawn bank and easy to walk on and that open space can comprise active and passive areas. This area of public open space was detailed under the parent permissions (P.A. Ref. 04/1170 and P.A. Ref. 04/30065) and deemed to be acceptable. The space is steeply sloped but is also substantial in scale and incorporates natural features, such as undulations and planting, that provide for visual interest and informal play. On this basis, I would accept the inclusion of this area in the overall calculation and am satisfied that the Development Plan standard is met.
- 7.6.3. It is proposed to provide a playground and playing pitch on the centrally located public open space within the development. This is in response to the requirements detailed in Table 15.1 of the Development Plan. The grounds of appeal argue that this would eliminate most of the existing public open space within the development. Concerns are raised in relation to use of the facilities by the wider community and the potential for disturbance and nuisance to residents from noise, pedestrian traffic, vehicular traffic and car parking associated with the use of the playground and playing pitch. Concerns are also raised in relation to the management of the play area. The concerns raised in the appeal were raised at application stage in submissions received by the Planning Authority. I would concur with the view of the residents in this regard. Drumbear Wood is an established residential estate and I am of the view that the proposed infill housing scheme to effectively finish the estate, does not trigger a requirement for the retrospective provision of these facilities. The central area of public open space is a well-designed open space that is well

overlooked and provides for both passive and active recreation, including informal kick about. It is unclear what benefit would accrue from the development of this area for more formal recreational facilities, particularly when a significant proportion of the residents have indicated their opposition to this. I recommend, in the event that the Board is minded to grant permission for the development, that the proposed playground and playing pitch are omitted by condition of permission.

7.7. Flood Risk

- 7.7.1. A Flood Risk Assessment was submitted to the Planning Authority at further information stage.
- 7.7.2. CFRAMS Mapping (2016) for the area indicates that the undeveloped housing lands are in Flood Zone B. The lands are at risk in a 0.1% AEP² (1 in 1000 year) fluvial flood event in the Droim Thoric Stream. This stream has been culverted via a 900mm diameter concrete pipe to the east of the site and modelling undertaken as part of the CFRAM study indicates that this culvert does not have adequate capacity to convey the 0.1% AEP flood volume. It is anticipated that the maximum fluvial flood level that may occur within the site during a 0.1% AEP event is 72.816 m OD.
- 7.7.3. The Flood Risk Management Guidelines indicate that residential development is a highly vulnerable development class and that such development can only be considered in Flood Zone B, where it meets the criteria of the Development Management Justification Test detailed in Chapter 5 of the guidelines. The applicant has completed a Justification Test and concludes that the proposed development accords with the criteria detailed in the Justification Test. In order to minimise flood risk, it is recommended that the FFLs are set to a minimum of 0.3 m above the 0.1 % AEP fluvial flood level to a level of 73.161 m OD. It is also concluded that the extent of flood water displacement arising from the development in a flood event would be negligible and that it would have an imperceptible impact on the hydrological regime of the area.
- 7.7.4. I consider the level of modelling and sensitivity analysis to be appropriate to the nature and scale of development proposed and accept the findings of this assessment.

² Annual Exceedance Probability.

7.8. Environmental Impact Assessment

7.8.1. Having regard to the minor nature and scale of the proposed development and its location in a serviced urban area, removed from any sensitive locations or features, there is no real likelihood of significant effects on the environment arising from the proposed development. The need for environmental impact assessment can, therefore, be excluded at preliminary examination and a screening determination is not required.

7.9. Appropriate Assessment

7.9.1. Having regard to the nature and scale of development proposed and to the nature of the receiving environment, in particular its location in a serviced urban area, 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.

8.0 **Recommendation**

8.1. I recommend that permission is refused for the reason set out below.

9.0 Reasons and Considerations

1. The existing vehicular access serving the Drumbear Wood housing development is at a priority junction between an arterial/link road (R188) and a local road within the 50 km/h speed limit zone. Having regard to the traffic characteristics on the arterial link road including design speed and traffic volume and to the limitations on forward visibility and sightlines at the existing entrance, the Board is not satisfied, based on the information submitted with the application and appeal, that the existing vehicular entrance is adequate to cater for the increased traffic movements that would be generated by the proposed development. It is considered that to permit the proposed development, would be contrary to the provisions of the Design Manual for Urban Roads and Streets (DTTS and DECLG 2013) and would, therefore, be contrary to the proper planning and sustainable development of the area.

Karen Kenny Senior Planning Inspector

5th December 2018