



An  
Bord  
Pleanála

## Inspector's Report ABP-302831-18.

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<b>Development</b>	Outline planning permission to demolish house and construct three no. new two storey detached houses.
<b>Location</b>	Greenwells Glory, Laurel Bank, Model Farm Road, Cork.
<b>Planning Authority</b>	Cork City Council.
<b>Planning Authority Reg. Ref.</b>	18/37850.
<b>Applicant(s)</b>	Lillian Nagle Walsh.
<b>Type of Application</b>	Outline permission.
<b>Planning Authority Decision</b>	Grant.
<b>Type of Appeal</b>	Third party.
<b>Appellant(s)</b>	Tony O'Donovan.
<b>Observer(s)</b>	None.
<b>Date of Site Inspection</b>	16 <sup>th</sup> January, 2019.
<b>Inspector</b>	A. Considine.

## **1.0 Site Location and Description**

- 1.1. The subject site lies to the south of Model Farm Road, to the south west of Cork City Centre. The wider area comprises a primarily residential area which include a varied of house types and styles including single storey, and two storey, detached and semi-detached houses. There are also schools in the vicinity, including a primary school to the east and a girls secondary school to the north.
- 1.2. The existing site is currently occupied by a large storey and a half house and its associated driveway and grounds. The boundaries to the site comprise high stone walls with high gates at the entrance, which were locked on the date of my inspection. The site has a stated area of 0.26ha, including the access laneway.
- 1.3. The site is accessed via a narrow lane, which extends 120m to the gate into the site. This laneway also provides access to a second detached two storey house located to the east of the main body of the site. The access laneway to the site is a private lane with the boundaries comprising high stone walls and dense planting.

## **2.0 Proposed Development**

- 2.1. Outline planning permission is sought to demolish house and construct three no. new two storey detached houses, all at Greenwells Glory, Laurel Bank, Model Farm Road, Cork.
- 2.2. While the applicant is for outline planning permission, the Board will note that house designs were also submitted showing two storey houses.

## **3.0 Planning Authority Decision**

### **3.1. Decision**

The Planning Authority decided to grant permission for the proposed development subject to 10 conditions.

### 3.2. Planning Authority Reports

#### 3.2.1. Planning Reports

The Planning report initially required further information to be submitted in terms of the legal interest in the land identified on the site layout plan and issues relating to siting, layout, landscaping and boundary treatments. The report includes an appropriate assessment screening and an environmental assessment.

Following receipt of the response to the further information the planning report notes the requirements of Section 34(13) of the Planning & Development Act, 2000 as amended in terms of the carrying out of development. The report formed the basis of the Councils decision to grant outline permission for the proposed development.

#### 3.2.2. Other Technical Reports:

**Environment Section:** No objection subject to compliance with conditions.

**Drainage Section:** Further information required or conditioned to any grant of planning permission.

A second report from the Senior Executive Engineer advises satisfaction that the issues raised can be conditioned as the application is for Outline planning permission.

**Road Design:** The report notes the proposal submitted and considers that it is dominated by vehicular priority. Other comments note the loss of mature trees and planting and the potential for vehicular conflict with the existing house on the lane.

#### 3.2.3. External Reports:

**DAA Cork Airport:** The site is located in the Outer Public Safety Zone relating to Cork Airport. It is requested that regard be had to Objective 12.24 'Public Safety Zones' of the Cork City Development Plan, 2015 in assessing the proposed development.

**Irish Water:** No objection

### 3.2.4. Third Party Observations:

There are 8 third party submissions noted on the PA file. The issues raised are summarised as follows:

- The development of 3 houses would change the nature of the area and would significantly impose on privacy of adjoining property by reason of overlooking on a number of sides and the removal of existing boundary planting and vegetation.
- The development will impact the value of existing houses in the area.
- The development represents a significant over intensification of development.
- Safety issues for pedestrians and car users, increasing the risk of a collision on the lane with the existing residential entrance.
- The development will significantly increase traffic levels on the laneway.
- The lanes junction with the main road has no markings and is heavily trafficked by pedestrians and children due to the presence of schools.
- The drawings are inaccurate and the laneway is not capable of accommodating two cars passing. A footpath will make the lane impassable to cars.
- The planning history for the area restricted development to two houses using the lane for reasons of safety, and this decision was upheld by An Bord Pleanala.
- The proposed development does not comply with the requirements of the Cork City Development Plan as it relates to infill housing.
- Site boundary includes land outside the ownership of the applicant.

## 4.0 Planning History

There is no relevant planning history pertaining to the subject site.

## 5.0 Policy Context

### 5.1. Sustainable Residential Development in Urban areas, Guidelines (DoEHLG, 2009):

- 5.1.1. These statutory guidelines update and revise the 1999 Guidelines for Planning Authorities on Residential. The objective is to produce high quality – and crucially – sustainable developments:
- quality homes and neighbourhoods,
  - places where people actually want to live, to work and to raise families, and
  - places that work – and will continue to work - and not just for us, but for our children and for our children’s children.
- 5.1.2. The guidelines promote the principle of higher densities in urban areas as indicated in the preceding guidelines and it remains Government policy to promote sustainable patterns of urban settlement, particularly higher residential densities in locations which are, or will be, served by public transport under the *Transport 21* programme.
- 5.1.3. Section 5.6 of the guidelines suggest that there should be no upper limit on the number dwellings permitted that may be provided within any town or city centre site, subject to the following safeguards:
- compliance with the policies and standards of public and private open space adopted by development plans;
  - avoidance of undue adverse impact on the amenities of existing or future adjoining neighbours;
  - good internal space standards of development;
  - conformity with any vision of the urban form of the town or city as expressed in development plans, particularly in relation to height or massing;
  - recognition of the desirability of preserving protected buildings and their settings and of preserving or enhancing the character or appearance of an Architectural Conservation Area; and

- compliance with plot ratio and site coverage standards adopted in development plans.

## 5.2. **Design Manual for Urban Roads and Streets (DEMURS), DoTTS, March 2013**

In terms of the design of the proposed development, including the entrance and access to the site, it is a requirement that they be considered against the Design Manual for Urban Roads and Streets (DEMURS), DoTTS, March 2013. This Manual replaces DMRB in respect of all urban roads and streets and it does not differentiate between public and private urban streets, where a 60kph speed limit or less applies. The implementation of DMURS is obligatory and divergence from same requires written consent from relevant sanctioning authority (NRA, NTA or DTT&S). The Manual seeks to address street design within urban areas (i.e. cities, towns and villages) and it sets out an integrated design approach.

## 5.3. **Development Plan:**

5.3.1. The Cork City Development Plan 2015 – 2021 is the statutory Development Plan for the city of Cork. The subject site is located within an area of Cork City which is zoned ZO 4 Residential, Local Services and Institutional Uses with the objective ‘to protect and provide for residential uses, local services, institutional uses and civic uses having regard to employment policies outlined in Chapter 3’.

5.3.2. It is a strategic goal of the plan ‘to increase population and households to create a compact sustainable city’. Chapter 6 of the Plan deals with Residential Strategy and the following objectives are considered relevant:

Objective 6.9 Housing Density:

To promote suitable densities to meet the needs outlined in the Core Strategy as set out in Chapter 16.

5.3.3. Chapter 16 of the City Plan deals with Development Management and the following sections are considered relevant:

### **Residential Design:**

16.46: All residential developments should:

- Reflect the existing character of the street with regard to the proposed design, proportion, massing, density and material of surrounding buildings;
- Maintain existing building lines, roof pitches and window proportions;

### **Proposals for New Residential Developments**

16.49: When assessing proposals for residential developments, the following (but not limited to) shall be considered:

- Density;
- Plot ratio;
- Accessibility, traffic impact, proximity to public transport, provision of adequate car & bicycle parking etc.;
- Statement of housing mix & type, and special needs housing as per Housing Strategy;
- Access to neighbourhood facilities;
- Design and quality of proposed layout;
- Orientation, overlooking and overshadowing;
- Provision of adequate public and private open space;
- Provision of waste storage & recycling facilities.

### **Infill Housing**

16.59: To make the most sustainable use of existing urban land, the planning authority will consider the appropriate development of infill housing on suitable sites on a case by case basis taking into account their impact on adjoining houses, traffic safety etc. In general, infill housing should comply with all relevant development plan standards for residential development, however, in certain limited circumstances; the planning authority may relax the normal planning standards in the interest of developing vacant, derelict and underutilised land. Infill proposals should:

- Not detract from the built character of the area;

- Not adversely affect the neighbouring residential amenities;
- Respect the existing building line, heights, materials and roof profile of surrounding buildings;
- Has an appropriate plot ratio and density for the site;
- Adequate amenity is proposed for the development.

#### **5.4. Natural Heritage Designations**

The subject site is located at a distance of approximately 10.5km from the nearest cSAC, Great Island Channel, cSAC Site Code 001058, and 5.5km from the Cork Harbour SPA, Site Code 004030. The site is not located within any designated site.

#### **5.5. Environmental Impact Assessment**

Having regard to the brownfield nature of the subject site, together with the scale of the proposed development, 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.

### **6.0 The Appeal**

#### **6.1. Grounds of Appeal**

This is a third party appeal against the decision of Cork City Council to grant permission for the proposed development. The issues raised reflect those raised during the PAs assessment and are summarised as follows:

- There are precedents for refusal cited in terms of nature, scale, character and proximity to boundaries.
- The layout and design of the proposed development does not strike a reasonable balance between the promotion of sustainable density and the protection of existing residential amenities and the established character of the area.



- Ownership of the site is questioned, and it is submitted that the proposed development site includes lands outside the applicants' ownership. The appellant disputes the red line boundary.
- Traffic safety issues and impacts on pedestrians.
- The proposed layout will impact on the mature trees currently planted along the eastern boundary which will have an impact on existing residential amenities.
- It is considered that the inadequate details submitted do not demonstrate how the applicant is to minimise the impact on the existing residential amenity of adjacent properties.

## 6.2. Applicant Response

The applicant has submitted a response to the third party appeal, which is summarised as follows:

- The appeal may be vexatious given that the appellants son looked to acquire an access road and obtaining a legal right to access the rear of a property fronting onto Model Farm Road via the applicants' property. No agreement could be reached.
- The proposed development complies with the zoning objective for the site and the strategic goals for Cork City.
- There is precedent for similar type developments being permitted in the area.
- The applicants' solicitor has confirmed ownership of the land and the applicant walks or drives the access roadway nearly every day.
- The traffic issues have been dealt with by the Planning Authority.
- The proposed dwellings were designed to minimise any adverse impact on adjoining properties. The only first floor window on the elevation adjoining the appellants property is a bathroom which will be fitted with opaque glass. There will be no overlooking.
- There is a separation of 1.2m from the easternmost dwelling and the eastern boundary of the site which is acceptable.

- The applicants agent submitted a comprehensive response to the PAs request for further information which clearly demonstrates the suitability of the proposal and demonstrated that the site was adequate to serve the development.

### 6.3. **Planning Authority Response**

Cork City Council submitted a response to the third party appeal advising no further comments.

### 6.4. **Observations**

None

## 7.0 **Assessment**

Having undertaken a site visit and having regard to the relevant policies pertaining to the subject site, the nature of existing uses on and in the vicinity of the site, the nature and scale of the proposed development and the nature of existing and permitted development in the immediate vicinity of the site, I consider that the main issues pertaining to the proposed development can be assessed under the following headings:

1. Principle of the Development
2. Roads & Traffic
3. Other Issues
4. Appropriate Assessment

### 7.1. **Principle of the Development:**

- 7.1.1. The site the subject of this appeal is located to the south west of Cork City centre, and to the south of Model Farm Road. The site is currently occupied by a large detached house on a site covering 0.2604ha. The site is located at the end of a privately owned laneway with a length of 120m, and the area of the lane is included in overall site area. This laneway also provides access to a second detached

property, to the east of the main body of the current proposed site. The site is located on land which is zoned ZO 4 Residential, Local Services and Institutional Uses with the objective 'to protect and provide for residential uses, local services, institutional uses and civic uses having regard to employment policies outlined in Chapter 3'. The Board will also note that the site can connect to public services.

7.1.2. The development proposes the demolition of an existing detached house, with a stated floor area of 323m<sup>2</sup> and the construction of 3 detached houses, with floor areas of 204m<sup>2</sup> each. While plans have been submitted for the houses, the Board will note that the application is for outline planning permission and not full planning permission. In light of the above, I am generally satisfied that the principle of the proposed development at this location can be considered acceptable and in compliance with the Cork City Development Plan, 2015-2021. Site suitability issues will be considered further below.

7.1.3. The Sustainable Residential Development in Urban Areas (DoEHLG, 2009) updated the Residential Density Guidelines for Planning Authorities (1999) and continues to support the principles of higher densities on appropriate sites in towns and cities. In this regard, I consider that it is reasonable to support the principle of the development potential of the subject site in accordance with said guidelines. The objective of the guidelines is to produce high quality, and crucially, sustainable developments. Section 5.6 of the guidelines provides certain safeguards with regard to such urban developments to deal with both existing and future residents the area of the proposed development. Said safeguards are detailed above in Section 5.1 of this report and I consider it reasonable to address the proposed development against same.

a) *Open space:*

The proposed development comprises a small residential development of three detached houses. In this regard, I am generally satisfied that there may be no real need to provide public open space as part of the development, if the private open space provision is appropriate and adequate.

In terms of private open space, I note that the site layout submitted proposes the provision of private open space to the rear of each house in the amount of 60-75m<sup>2</sup>. While I acknowledge that these figures would comply with the

minimum requirements of the City Development Plan, I am concerned that the development, as proposed, does not have any regard to the context of the site and its surroundings. This area of Cork City generally comprises detached and semi-detached family homes on large sites and with ample private open space.

Overall, I am not satisfied that the layout of the proposed development is acceptable, particularly given the context of the site and the layout of the road and turning area. In the absence of any public open space, I have concerns that the layout prioritises vehicles and would therefore impact on the residential amenities of future occupants of the houses.

*b) Impact on the amenities of existing or future adjoining neighbours;*

In terms of avoiding undue adverse impacts on the amenities of existing or future neighbours, I have raised my concerns in terms of the open space provision above and the potential impacts on future residential amenity. In terms of potential impacts on existing residential amenities, the Board will note the third party submissions to the Planning Authority as well as the third party appeal.

The PA sought additional information in relation to landscaping and boundary treatment. In response, the applicant submitted a plan which indicates the intention to maintain existing mature trees to the rear boundary (north) and to reinforce planting where required. A 1.8m high wall, capped and plaster finished is proposed along the western boundary with the existing southern and eastern boundaries maintained with reinforced planting where required.

The third parties raised concerns in terms of overlooking, the loss of trees and increased traffic on the lane. The issue of roads and traffic will be addressed further below. In terms of the proposal before the Board, and while I acknowledge the thrust of national and local policy to increase density in serviced areas, I have a real concern that the layout and number of houses proposed will significantly alter the existing context of the area. In this regard, I consider that the proposal represents an overdevelopment of the site and would, by reason of proximity to the site boundaries to the east and west, would impact on the existing residential amenities of adjacent properties.

c) *Good internal space standards of development;*

Although the application is for outline permission, plans for three large 4 bed detached family homes are presented. I am satisfied that all provide a good level of internal space.

d) *Conformity with any vision of the urban form of the town or city as expressed in development plans, particularly in relation to height or massing;*

Given the nature and scale of the proposed development, I am satisfied that the development might reasonably be considered as being acceptable in principle. National and local policies encourage increased densities in serviced areas and Cork City Development Plan promotes infill development. Section 16.59 of the Plan states 'The planning authority will consider the appropriate development of infill housing on suitable sites on a case by case basis taking into account their impact on adjoining houses, traffic safety etc... Infill proposals should:

- *Not detract from the built character of the area;*

I have referred above to the context of the area in which the subject site lies and I consider that the proposal to construct 3 houses on the site would not accord with the existing built character of the area.

- *Not adversely affect the neighbouring residential amenities;*

The third party appellant has raised concerns in relation to the potential impact of the development on their existing residential amenities. I would agree that the proposed development within 1.2m of the eastern boundary would have the potential to significantly impact on the existing trees on the boundary. Given that the application is an outline application, I do not consider that adequate information has been presented in terms of protecting the existing mature planting on the site, and as such, the development would adversely affect the neighbouring residential amenities.

- *Respect the existing building line, heights, materials and roof profile of surrounding buildings;*

This is an outline planning application, but I note that house designs have been submitted in support of the proposed development. I have no objection to the house designs submitted.

- *Has an appropriate plot ratio and density for the site;*

I consider that in principle, the development has an appropriate plot ratio and density, but that they are not appropriate to the context of the subject site.

- *Adequate amenity is proposed for the development;*

I have addressed above, my concerns in terms of the provision of open space and in particular, I consider that the proposed layout of the development site prioritises vehicles and would therefore impact on the residential amenities of future occupants of the houses.

In principle, while I have no objection *per se* to the redevelopment of the subject site, I consider that the layout and number of houses proposed is unacceptable and would have a significant impact on the existing residential amenities of properties in the vicinity. I also have concerns in relation to pedestrian and traffic safety.

- e) *Impact on protected buildings of ACAs;*

Not relevant in this instance as there is no protected structure or Architectural Conservation Area in proximity to the subject site.

- f) *Compliance with plot ratio and site coverage standards adopted in development plans.*

The Cork City Development Plan 2015-2021 provides guidance in terms of site coverage and density and having regard to the nature of the subject site, I am satisfied that the proposed development is acceptable in terms of site coverage and plot ratio. Given the context of the site however, I have reservations regarding the layout and number of houses proposed.

- 7.1.4. It is acknowledged that national guidelines encourage the provision of higher density development within urban areas in order to use serviced lands in a sustainable manner, but regard has to be given to the existing nature of development in the vicinity of the subject site as well as the context and scale of the surrounding area and existing residential developments.
- 7.1.5. Having regard to the above, and acknowledging that I consider that the principle of the proposed development is acceptable, given the location of the subject site in proximity to Cork City and in close proximity to public transport links, I consider that the layout and number of houses proposed would impact on the existing character of the area and on the existing residential amenities of property. However, should the Board be minded to grant permission for the development, I consider that a maximum of 2 houses only should be permitted on the site with no house being within 5m of the site boundaries, in order to protect the existing trees on site boundaries.

## **7.2. Roads & Traffic:**

- 7.2.1. Access to the subject site is proposed over the existing road network in the vicinity, and ultimately, over an existing private laneway which currently serves the existing house on the site and a second property to the east. The laneway, which is approximately 5.5m in width, currently cannot accommodate two cars passing due to trees and planting on both sides. At the junction of the lane with Laurel Bank, there is a house on the northern corner which restricts visibility to the north – towards Model Farm Road. To the south there is adequate sight distances, except when cars are parked along the footpath. Convent Lane runs to the east almost directly across from the entrance to the lane. I note that there is no footpath along Laurel Bank and that this narrow public road, which accommodates two way traffic, is also a pedestrian route to the girls secondary school located to the north of Model Farm Road.
- 7.2.2. The Board will note that a primary concern of third parties relates to roads and traffic issues. It is submitted that the existing road network is incapable of accommodating the level of traffic the development, if permitted, would generate. In particular, I am concerned in terms of pedestrian safety in the context of the information submitted. I note the proposal to provide a 1m footpath along the southern boundary of the laneway which would result in a carriageway of approximately 4.5m in width. I also

note the comments of the Road Design section of Cork City Council where concerns are raised in terms of the design being dominated by vehicular priority and the potential for conflict with vehicles exiting the neighbouring property.

7.2.3. In terms of the design of the proposed development, including the entrance and access to the site, it is a requirement that they be considered against the Design Manual for Urban Roads and Streets (DMURS), DoTTS, March 2013. This Manual replaces DMRB in respect of all urban roads and streets and it does not differentiate between public and private urban streets, where a 60kph speed limit or less applies. The DMURS provides radically new design principles and standards from DMRB. The implementation of DMURS is obligatory and divergence from same requires written consent from relevant sanctioning authority (NRA, NTA or DTT&S) and is applicable in the case at hand. The Manual sets out an integrated design approach whereby the design must be:

- a) Influenced by the type of place in which the street is located, and
- b) Balance the needs of all users.

7.2.4. DMURS sets out a road user priority hierarchy as follows:

- 1 Pedestrians;
- 2 cyclists
- 3 public transport
- 4 car user.

The key design principles for roads include integrated streets to promote higher permeability & legibility and the measuring of street quality on the basis of quality of the pedestrian environment. DMURS defines a hierarchy of places based on place-context and place-value, which require a higher level of integration between users to calm traffic and increase ease of movement for vulnerable users.

7.2.5. The design manual also provides detailed standards for appropriate road widths - 2.5m to 3m per lane on local streets. DMURS requires that footpaths be a minimum of 1.8m, which, if applied, would further reduce the carriageway to approximately 3.7m. I note the submission of the Road Design section of Cork City Council that a number of pull in points, or lay-bys, could be provided along the lane to allow vehicles to pass and prevent reversing movements onto the public road. There is no



indication as to where these lay-bys might be facilitated along the lane and potential solutions to address the potential conflict with the existing entrance on the lane, would require works to the appellants boundary wall with the lane.

7.2.6. In terms of an increase in traffic as a consequence of the proposed development, I would accept that during the construction phase, there is likely to be an impact on the residents of the adjacent property. However, this impact will be temporary and therefore, acceptable in my opinion.

7.2.7. Once constructed, if permitted as proposed, I do not consider that the lane can accommodate additional traffic without undue impacts on the existing road network. In particular, and in the absence of clear details of compliance with DMURS, I consider that the development, and the traffic it would generate, would endanger public safety by reason of traffic hazard and would lead to conflict between road users, in particular, vehicular traffic, pedestrians and cyclists and would potentially result in cars having to reverse onto the public road blindly when they meet a second car on the lane. Should the Board be minded to grant permission for the development, I consider that a maximum of two houses should be permitted on the overall site, in the interests of traffic and pedestrian safety, and not before all above concerns have been appropriately addressed.

### 7.3. **Other Issues**

#### 7.3.1. Ownership issues:

The Board will note that the third party appellant has submitted that the applicant has included lands which are outside their ownership. In response, the applicant submitted a solicitors letter to the Planning Authority advising that she was the full owner of the lands. In this regard, I refer the Board to Section 34(13) of the Planning and Development Act, 2000 as amended which states that a person shall not be entitled solely by reason of a permission under section 34 to carry out any development.

In addition, the Development Management Guidelines for Planning Authorities, 2007, at section 5.13 notes that the planning system is not designed as a mechanism for resolving disputes about title to land or premises or rights over land. Such disputes are a matter for the courts and are outside the remit of the Board. I am satisfied that

the applicant has demonstrated sufficient legal interest in the lands to make the application.

#### 7.3.2. Vexatious Appeal:

The applicant has submitted, in their response to the third party appeal, that it may be that the appeal is vexatious. I am satisfied that the third party appeal raised sufficient planning concerns and it was validated on receipt.

#### 7.3.3. Water Services

The proposed development will connect to existing services which serve the wider area. The public system appears to have adequate capacity to accommodate the proposed development and Irish Water has indicated no objections.

### 7.4. **Appropriate Assessment**

The subject site is located at a distance of approximately 10.5km from the nearest cSAC, Great Island Channel, cSAC Site Code 001058, and 5.5km from the Cork Harbour SPA, Site Code 004030. The site is not located within any designated site. The site is currently development and therefore can be considered as a brownfield site within an urban and serviced area. The planning report on file concludes that appropriate assessment is not required.

Overall, I consider it is reasonable to conclude on the basis of the information available that the proposal individually or in combination with other plans or projects, would not adversely affect the integrity of a Natura 2000 site having regard to the nature and scale of the proposed development and separation distances involved to adjoining Natura 2000 sites. It is also not considered that the 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. Notwithstanding the zoning objective afforded to the site, I have serious concerns regarding the proposed development in terms of lack of public open space, the road layout prioritising vehicles and the ability of the laneway to accommodate the traffic generated by the proposed development. In addition, I consider that the

development would be inconsistent and out of character with the pattern of development in the vicinity. I therefore recommend that outline planning permission be refused for the reasons stated below.

Should the Board be minded to grant permission in this instance, I recommend that no more than two residential units be permitted on the site with a revised site layout which provides appropriate distances between the houses and the site boundaries to protect existing mature trees and hedges. In addition, no permission should be granted until such time as the roads and traffic issues have been addressed satisfactorily.

## 9.0 Reasons and Considerations

1. Having regard to the limited area and access arrangements associated with the site and its proposed layout and its relationship to adjoining property, it is considered that the proposed development would be inconsistent with the prevailing density and would be out of character with the pattern of existing development in the vicinity, which would result in overdevelopment of the site and would seriously injure the amenities of adjoining residential property. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.
2. Having regard to the restricted nature of the access lane, the vehicular priority layout and the lack of details to comply with the Design Manual for Urban Roads and Streets (DMURS), DoTTS, March 2013, it is considered that the additional traffic associated with the proposed development would endanger public safety by reason of traffic hazard and would lead to conflict between road users, in particular, vehicular traffic, pedestrians and cyclists on the access lane and the interface with the public road. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.

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A. Considine  
Planning Inspector  
28<sup>th</sup> January, 2019