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Bord  
Pleanála

## Inspector's Report ABP-304447-19

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<b>Development</b>	Erect 4 x 2-storey houses
<b>Location</b>	Manor Avenue, Terenure, Dublin 6W
<b>Planning Authority</b>	South Dublin County Council
<b>Planning Authority Reg. Ref.</b>	SD18A/0356
<b>Applicant(s)</b>	Patsy Carmody
<b>Type of Application</b>	Permission
<b>Planning Authority Decision</b>	Refuse
<b>Type of Appeal</b>	First Party
<b>Appellant(s)</b>	Patsy Carmody
<b>Observer(s)</b>	Four
<b>Date of Site Inspection</b>	17th September 2019
<b>Inspector</b>	Karla Mc Bride

## 1.0 Site Location and Description

- 1.1. The appeal site is located in Terenure on the south side of Dublin. The surrounding area is predominantly residential in character comprising a mix of single and 2-storey detached and semi-detached houses. The back-land site is located to the rear/north of College Drive and it is occupied by a 2-storey commercial/industrial building which is accessed via a narrow laneway off Manor Avenue to the E. The rectangular shaped site and laneway are bound to the N by detached single storey and dormer houses and to the E by Manor Avenue which provides access to these houses. The site is bound to the S and W by 2-storey houses along College Drive and Wainsfort Road. The site and laneway boundaries are defined by existing walls and trees and part of the existing boundary wall to the S comprises the remains of an early 19<sup>th</sup> Orchard Wall which was originally associated with Elm House and Coach house.
- 1.2. Photographs and maps in Appendix 1 describe the site and environs in more detail.

## 2.0 Proposed Development

Demolish the existing building and provide 4 x 3-bed houses on 0.13ha site:

- The 2-storey terrace would be 35m long, 6.8m to 9.8m deep and c.7m high
- Vehicular access via Manor Avenue to the E with 5 car parking spaces
- Boundary treatment, landscaping & associated site works

### Accompanying documents:

- Drainage Design Report
- Swept Path Analysis drawings (FI)
- Landscape Design Rationale & Masterplan (FI)
- Tree Survey, Arboricultural Impact Assessment & Method Statement (FI)

## 3.0 Planning Authority Decision

### 3.1. Further Information

Further information was requested in relation to the following:

1. Assess of ability of emergency vehicles to access site – *Swept Path Analysis drawings submitted.*
2. Landscape Design Rationale & landscape proposals – *details submitted.*
3. Tree Survey, Arboricultural Impact Assessment & Method Statement – *details submitted.*

### 3.2. Decision

Following the receipt of FI, the planning authority decided to refuse planning permission for the proposed development for 1 reason related to:

1. Concerns in respect of the turning movements illustrated for a rigid bed refuse or fire tender vehicle.... proposed multi-movements required to turn such a vehicle is considered hazardous and totally dependent on a clear path being available in perpetuity ..... the ability of service vehicles to adequately turn onsite uninhibited has not been demonstrated.... direct impact on the health and safety of future occupants..... Having regard to the under provision of car parking at the site.... there is potential for parking vehicles in undesignated parking areas onsite ... this may lead to difficulties in service vehicles turning ... emergency vehicles accessing the site and turning. Prejudicial to public health & contravention of residential zoning objective.

### 3.3. Planning Authority Reports

#### 3.3.1. *Planning Reports*

Following the receipt of FI, the Planning Officer recommended refusal of planning permission.

### 3.3.2. **Other Technical Reports**

Roads & traffic: Recommended refusal for 3 reasons related to (a) overdevelopment of small site, (b) under provision of car parking spaces and (c) difficulties associated with turning emergency & service vehicles. Concerns sustained after receipt of FI.

Water & Drainage: No objections subject to compliance with conditions.

Environment: FI required in relation to existing trees, boundary treatment & landscaping. No objection following receipt of FI.

EHO: FI required in relation to Construction Management Plan & foul drain modifications.

### 3.4. **Prescribed Bodies**

**Irish Water:** No objections subject to compliance with conditions.

### 3.5. **Third Party Observations**

Several submissions received from neighbouring residents who raised concerns in relation to: - residential amenity & overlooking; unsafe car parking arrangements, substandard access & traffic safety; insufficient water & drainage capacity; loss of heritage; and out of character with the area.

## 4.0 **Planning History**

No recent planning history for the site.

**PL.6/5/53015:** Permission granted in 1982 for a housing development at Manor Avenue, Wainsfort Grove, Condition no.7 required the retention of the existing old boundary wall.

Several detached houses permitted and constructed to the N of the site with access off Manor Avenue.

## 5.0 Policy Context

### 5.1. National Policy

#### **National Planning Framework 2040 & National Development Plan 2018-2017**

These documents set out a strategic vision for the future development of the country.

#### **Rebuilding Ireland: Action Plan for Housing and Homelessness, 2016**

This document seeks to accelerate housing supply, tackle the housing shortage and address the needs of homeless people and families in emergency accommodation accelerating the provision of social housing, delivering more housing, utilising vacant homes and improving the rental sector.

#### **Guidelines on Sustainable Residential Development in Urban Areas, 2009**

These guidelines set out the key planning principles which should be reflected in development plans and local area plans, and which should guide the preparation and assessment of planning applications for residential development in urban areas and they are accompanied by a non-statutory residential design manual. Chapter 5 provides advice on appropriate locations for increased densities whilst sites in excess of 0.5ha may have the potential to set their own density, subject to environmental and residential amenity considerations.

#### **Design Manual for Urban Roads and Streets, 2013**

This manual provides guidance relating to the design of urban roads and streets. It seeks to address street design within urban areas and it sets out an integrated design approach which must be influenced by the type of place in which the street is located, and balance the needs of all users. It also aims to put well designed streets at the heart of sustainable communities which can create connected physical, social and transport networks that promote real alternatives to car journeys, including walking, cycling or public transport.

## **Regional Planning Guidelines for the Greater Dublin Area, 2010-2022**

These guidelines provide a long-term strategic planning framework for the development of the GDA, they set out a population growth framework, housing targets and housing land requirements for each local authority.

### **The Planning System and Flood Risk Management – Guidelines for PAs**

These guidelines require the planning system to avoid development in areas at risk of flooding, particularly floodplains, unless there are proven wider sustainability grounds that justify appropriate development and where the flood risk can be reduced or managed to an acceptable level without increasing flood risk elsewhere; adopt a sequential approach to flood risk management when assessing the location for new development based on avoidance, reduction and mitigation of flood risk; and incorporate flood risk assessment into the process of making decisions on planning applications and appeals.

#### **5.2. Local Planning Policy**

The site is covered by the South County Dublin Development Plan 2016 to 2022.

**Zoning objective:** RES Zone seeks to protect and/or improve residential amenity.

#### **Residential consolidation:**

**Policy H17:** seeks to support residential consolidation and sustainable intensification at appropriate locations, to support ongoing viability of social and physical infrastructure and services and meet the future housing needs of the County.

**H17 Objective H2:** seeks to maintain and consolidate the County's existing housing stock through the consideration of applications for housing subdivision, backland development and infill development on large sites in established areas, subject to appropriate safeguards and standards identified in Chapter 11.

**H17 Objective 5:** seeks to ensure that new development in established areas does not impact negatively on the amenities or character of an area.

### **Residential development standards:**

Density:	Higher within walking distance of town/district centres & high capacity public transport (greater than 35/ha.).
Height:	Consistent with area.
Dwelling mix:	Contribute to overall mix in locality on smaller infill sites.
Separation distances:	22m between opposing first floor windows.
Private amenity space:	60sq.m. for 3-bed units.
Public open space:	10% of Site Area.
Car parking:	2 spaces (Zone 1) 1.5 spaces (Zone 2)

### ***Infill Sites:***

Development on infill sites should meet the following (relevant) criteria:

- Be guided by national guidelines.
- Scale, siting & layout should account of the local context...on smaller sites of c.0.5 hectares or less a degree of integration with the surrounding built form will be required (density, roof forms, fenestration, materials & finishes).
- Significant site features, such as boundary treatments, pillars, gateways and vegetation should be retained, in so far as possible....
- Where the proposed height is greater than that of the surrounding area a transition should be provided.
- Reduced open space & car parking standards may be considered for infill development ..... relative to the quality & quantum of private open space, proximity of public parks, public transport and services and facilities.

### ***Backland Development:***

The design of development on backland sites should meet the criteria for infill development in addition to the following criteria:

- Be guided by a site analysis process in regard to the scale, siting and layout.
- Avoid piecemeal development that adversely impacts on the character of the area and the established pattern of development in the area.
- Development that is near adjoining residential properties should be limited to a single storey, to reduce overshadowing and overlooking.
- Access for pedestrians and vehicles should be clearly legible and, where appropriate, promote mid-block connectivity.

### 5.3. Heritage Designations

Archaeology: No designated sites in vicinity

Built heritage: No designated sites in vicinity

Natural heritage: No designated sites in vicinity

### 5.4. Screening for Environmental Impact assessment

Having regard to the nature and scale of the proposed development and the separation distance to any sensitive location, there is no real likelihood of significant effects on the environment arising from the 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 First Party Appeal

- Proposal complies with National & Regional policy, the Development Plan Core Strategy, residential zoning objective and development standards for Infill & Backland sites, and it seeks to respond to the current housing crisis.
- No under provision of car parking, the Planner's report stated that the site is within Zone 2 and Table 11.24 states that the maximum parking rate for a 3-bed house in Zone 2 is 1.5 spaces, 5 are provided at 1.25 ratio.
- Area is well served by public transport within a 1km and 400m radius of the site including No. 54a along Fortfield Road and it will be served in the future under Bus Connects (15 x Core Bus Corridors & 8 x High Frequency Route Spines); and proximate to cycling infrastructure and the Greenway Network.
- Emergency & service vehicles can perform multi-movement turning on site as demonstrated in the Swept Path Analysis drawings; a fire hydrant will be provided on site as part of the drainage proposals; the Landscape Plan delineates the car parking & road surfaces; and close to public transport.



- Planning system cannot anticipate potential illegal behaviour.
- Illegal behaviour is unlikely to due to site constraints & management company will not facilitate illegal parking.
- Proposed 4-unit residential development with 5 car parking spaces accords with the principles of the proper planning & sustainable development.
- Willing to accept the omission of 1 unit to achieve a higher car parking ratio.

## 6.2. **Planning Authority Response**

The planning authority raised no new issues.

## 6.3. **Prescribed Bodies**

No submissions received.

## 6.4. **Observers**

Four letters received from local residents who raised several concerns:

- College & Wainsfort Road Residents Association:
- Greg & Carol Edwards & others
- Ciaran & Pauline Ryan and Arlene Donnellan
- Collette Cregg,

### ***Collective concerns:***

- Loss of or reduction in height of c.5m high boundary wall would adversely affect the privacy & security of houses to the S & W.
- Historic boundary wall should be retained because of its historic significance as it formed part of the Orchard Wall at the c.1800s Elm Grove House.
- Wall also comprises the boundary to the rear of nos. 44-52 College Drive and permission should be sought from the owners of these properties for changes.
- Retain & maintain boundary during works (as per Condition 7 of PA/2653/80).

- Traffic generation, congestion, overspill car parking & traffic hazard along narrow substandard laneway, disturbance during construction & inaccessible to emergency vehicles.
- Inadequate spare capacity in public sewer & poor water pressure.
- Part of roadway is not in the charge of the LA and there is no agreement in relation to its maintenance & upkeep.
- Inadequate public open space.
- Excessive scale & out of character with pattern of development in the area.
- Adverse impact on amenities of no.4 Manor Avenue (overshadowing, overlooking, loss of privacy & security).
- Inadequate location of public notices (mid-way down lane & Sun newspaper).

## 7.0 Assessment

The main issues arising in this case relate to the following:

- Principle of development
- Density, layout & design
- Residential amenity
- Vehicular access & car parking
- Other issues
- Appropriate Assessment

### 7.1. Principle of development

The proposed development would be compatible with the core strategy, settlement strategy and the residential zoning objective for the area, and it would constitute an appropriate and sustainable use of residentially zoned lands within the GDA.

### 7.2. Density, layout & design

#### ***Density:***

National policy seeks to achieve higher densities on residentially zoned lands at appropriate locations throughout the country. The Development Plan seeks to encourage higher densities in excess of 35 units/ha on sites which are located within walking distance of District or Town Centre and close to high frequency public transport. The proposed residential development would occupy a suburban site c.1.3km to the SW of Terenure Village and the surrounding area is reasonably well served by Dublin Bus. The proposed development would comprise a mix of 4 units on a 0.13ha site which equates to c.32 units per/ha. Having regard to the backland location and the site configuration, I am satisfied that the proposed development would provide for an acceptable residential density.

***Context:***

The proposed development would occupy a rectangular shaped and level site which is bound to the S and W by 2-storey houses and to the N by a 2-storey detached house. The site boundaries are defined by a c.5m high stone wall to the S and W which was part of the original historic walled orchard from the early 1800s, and a more recent c.2m high wall to the N. The W part of the site is occupied by a rectangular shaped 2-storey industrial building which runs along an E-W axis and the N facing elevation comprises the historic stone façade of the original coach house.

***Internal layout:***

It is proposed to retain the historic boundary wall to the S, demolish the industrial building and reuse the stone from the front façade in the new development. The proposed terrace of 4 x 2-storey houses would be located in the W section of the site and it would occupy the footprint of the existing structure along an E-W axis. The 35m long and c.7m high terrace would be located parallel to the rear garden boundary of the neighbouring house to the N and it would be set back between c. 1.8m to 3.4m from the boundary wall and c. 2.5m from the side elevation of this house. Vehicular access would be via an existing narrow laneway to the E which is between c.3m and c.4.5m wide. A total of 5 x off-street car parking spaces would be located parallel to the eastern gable and no open space would be provided.

At national level, the Urban Design Manual Best Practice Guidelines contains criteria for the development of new residential areas, particularly in relation to context, connections and the public realm, and the Design Manual for Urban Roads and Streets aims to put well designed streets at the heart of sustainable communities.

At local level, in relation to infill sites the Development Plan requires a degree of integration with the surrounding built form (including density, roof forms, fenestration, materials and finishes), the retention of significant site features (such as boundary treatments), and a height transition if necessary. Reduced open space standards may be considered relative to the provision of quality private open space and proximity of public parks. The Plan requires that the scale, siting and layout of back

land development should respond to the site and not adversely impact on the character or pattern of development in the area, and development that is close to adjacent houses should be limited to single storey so as to reduce overshadowing and overlooking.

I inspected the site and surrounding area, I had regard to its residential zoning objective and the site development standards, the site constraints in relation to the backland location and rectangular configuration, and the relationship of the proposed terrace to the neighbouring houses, and in particular the narrow separation distance between the proposed structure and the adjoining site to the N. Notwithstanding the residential zoning objective and the site constraints I am not satisfied that the proposed layout would be optimal for this location as it would fail to comply with several of the criteria and standards set out in the Urban Design Manual Best Practice Guidelines and the Development Plan for infill and back land sites.

The absence of public open space is considered acceptable having regard to the small number of units proposed and the proximity of the development to a public open space to the E. The concerns raised by the Observers in relation to the continued retention of the historic c.5m high boundary wall could be addressed by way of a planning condition, in the event that the board is satisfied with all other aspects of the development.

***Design:***

The proposed 2-storey terrace would have a suburban style design which is typical for the area, the stone from the existing coach house façade would be reused in the proposed elevations and landscaping would be provided along the site boundaries. The design of the proposed houses is considered acceptable in terms of visual amenity and the development would not be visible from any of the surrounding residential roads. There is no uniformity in the design of the existing houses to the immediate N which are accessed off Manor Avenue and the proposed development would not detract from the character of the area. The proposed landscaping, hard surface and boundary treatments are acceptable in terms of visual amenity and the contents of the Tree and Arboricultural reports are noted.

### 7.3. Residential amenity

#### ***Proposed houses:***

The proposed 3-bed units would provide for an acceptable level of residential amenity with respect to floor area, room size, orientation and storage, broadly in line with national and local planning standards, and all of the houses would have rear gardens of an adequate size. The absence of public open space is noted but considered acceptable given the small scale of the development, the site constraints and the proximity of the development to an area of public open space to the E.

#### ***Relationship to N:***

The site is bound to the N by an existing detached 2-storey house that fronts on to an extension of Manor Avenue and the site boundary is defined by a c.2m high wall. The existing industrial building is c.30m long and c.6.5m high and it is set back from the N site boundary by between c.2.5m and 3.5m. The proposed c.35m long and c.7m high terrace would be located parallel to the rear garden boundary of the neighbouring house and side elevation, and it would be set back between c.1.8m and 3.4m from the boundary wall, and the easternmost unit would be located within c.2.5m of the side elevation of the neighbouring house.

As previously noted in relation to the development of infill and backland sites, the Development Plan states that development that is close to adjacent houses should be limited to single storey so as to reduce overshadowing and overlooking.

Notwithstanding the presence of an existing 2-storey building on the site, the proposed terrace would be c.5m longer, c.0.5m higher and almost c.1.0m closer to the adjacent site than the existing building. The proposed terrace would also contain windows and doors at ground level in close proximity to the neighbouring 2.0m high boundary wall and side elevation. It would also contain windows at first floor level, although it is noted that these windows would mainly provide light to bathrooms, landings and stairwells.

Having regard to the foregoing, I am not satisfied that the proposed development would not have an adverse impact on residential amenities of the neighbouring house by way of additional overlooking, loss of privacy and general disturbance.

***Relationship to S:***

The site is bound to the S by a c.5m high stone wall with several 2-storey houses beyond and it is proposed to retain this wall. The proposed 2-storey terrace would be located at an angle to, and between c.15m and c.30m from the rear elevations of the neighbouring houses with no overlooking or overshadowing anticipated. It is noted that the FI Landscape Masterplan (Drawing no. 01(A1)) indicates the provision of a 2m high boundary wall along the S site boundary with the 5m high stone wall. In the interest of clarity, the retention and maintenance of the 5m high stone wall should be required by way of a planning condition, as previously stated.

***Relationship to W & SW:***

The site is partly bound to the W and SW by a c.5m high stone wall with several 2-storey houses beyond. The proposed 2-storey terrace would be located a substantial distance from the neighbouring houses with no overlooking or overshadowing anticipated. It is not clear from the submitted plans whether or not this W section of the existing wall would be retained, and it is noted that the FI Landscape Masterplan (Drawing no. 01(A1)) that a 2m high boundary wall would be provided. In the interest of clarity and to protect residential amenity and heritage, the retention and maintenance of the 5m high stone wall should be required by way of a planning condition, as previously stated. Furthermore, the applicant should be required to submit full details of the boundary treatment in the W section of the site to the planning authority for written agreement before development commences.

***Conclusion:***

Having regard to the foregoing, I am satisfied that the proposed development would provide for an acceptable level of residential amenity for future occupants. However, I am not satisfied that it would not have an adverse impact on the residential amenities of any neighbouring of the adjoining dwelling house to the N.

#### 7.4. Vehicular access and car parking

The proposed development would be located at the W end of a narrow and winding laneway that is between c.3m and c.4.5m in width and extends for c.200m from Wainsfort Grove along Manor Avenue. The Manor Avenue section provides access to several detached houses whilst the remaining section, which is in the applicant's ownership, provides access to the appeal site and one other house. It is noted that another house along College Drive to the S has a gated access to a rear garden off this section of the laneway.

The Council's Roads Department noted that the laneway is c.3m wide in places with access hindered by obstacles along the route, that it would be inaccessible to emergency services vehicles and that inadequate car parking spaces would be provided, and recommended planning permission be refused. The applicant was requested to address these concerns by way of Further Information and a Swept Path Analysis drawing was submitted to demonstrate that the site would be accessible and that there is adequate space within the site to accommodate access and turning movements. The Road Department was not satisfied with the FI response and in particular the turning movements illustrated for a rigid bed refuse of fire tender vehicle. It stated that the multi-movements required to turn such a vehicle is hazardous and totally dependent on a clear path been available in perpetuity. Refusal of planning permission was recommended for 3 reasons related to the overdevelopment of the site, under provision of car parking spaces and difficulties associated with turning service vehicles.

Permission was subsequently refused for 1 reason which reflected most of these concerns as summarised in section 3.2 above, and it linked the under provision of car parking space with potential overspill parking within the site and along the laneway. The appellant is nonetheless satisfied that the proposed development can be safely accessed by emergency and service vehicles, however she had suggested the possible omission of 1 of the 4 units in order to provide more turning space within the main part of the site.



I inspected the site and surrounding area, I had regard to its residential zoning objective and the site constraints in relation to the backland location and site configuration, and I would concur with the concerns raised by the Council's Roads Department and the Planning Officer. As previously stated, the laneway is narrow and winding and there is a sharp bend c.30m to the SW of where it diverges from Manor Avenue in the vicinity of the entrance to the rear garden of the house along College Drive.

The 4 houses would be served by 5 car parking spaces which equates to 1.25 spaces per unit. The Development requires 2 spaces per unit in Zone 1 and 1.5 spaces per unit in Zone 2 which equates to a requirement of 10 spaces and 7.5 respectively. Zone 2 is defined as being within 400m of a high-quality public transport service - where buses operate with a min.10-minute frequency at peak times & 20-minute off-peak frequency. The site and surrounding area are served by Bus no.54a along Fortfield Road which operates with a 30-minute frequency during the week and a 60-minute frequency on Sundays. It is noted that other bus routes in the wider area provide a more frequent service within an c.15-minute walk of the site and that public transport accessibility could be improved in the future if the Bus Connect plans are implemented.

Notwithstanding the foregoing, and having regard to the particular characteristics of the site, the proposed development would fail to provide an acceptable level of car parking in compliance with either the Zone 1 or 2 standards which could give rise to overspill car parking outside of the delineated parking spaces within the main part of the site and along the narrow laneway. This would have an adverse impact on vehicular movements along the laneway and within the site, particularly for emergency and service vehicles which could, in turn, give rise to a traffic hazard and endanger to safety of other road users and possibly the safety of future occupants of the development and neighbouring houses in the event of an emergency. The appellant's suggestion to omit 1 of the 4 houses in order to improve the car parking ratio and provide more space for vehicular turning movements is noted, however my concerns in relation to manoeuvrability along the laneway remain unresolved.

These concerns, when combined with the issues raised in relation to the layout of the proposed development relative to the site constraints and its relationship to the neighbouring houses as assessed in sections 7.2 and 7.3 above, would lead me to conclude that the proposed development would be contrary to the proper planning and sustainable development of the area.

#### 7.5. **Other issues**

**Environmental services:** The proposed water supply, wastewater drainage, surface water drainage arrangements and onsite fire hydrant are acceptable subject to compliance with the requirements of Irish Water and the planning authority.

**Flood risk:** The proposed development would not give rise to a flood risk provided that all of the surface water drainage arrangements are implemented in accordance with Council requirements.

**Social & affordable housing:** The Part V, Section 96 requirements do not apply.

**Appropriate Assessment:** The site is located a substantial distance from any European Sites. Having regard to the small scale of the proposed works and the absence of a direct connection between the works any designated site, I am satisfied that Screening for Appropriate Assessment is not required.

#### 8.0 **Recommendation**

Arising from my assessment of this appeal case I recommend that planning permission should be refused for the proposed development for the reasons and considerations set down below.

## 9.0 Reasons and Considerations

1. Having regard to the provisions of the South County Dublin Development Plan 2016 to 2022, and in particular the car parking standards set out in Table 11.24, the backland location and configuration of the site and the narrow width of the laneway, and to the nature and scale of the proposed development including the proposed vehicular access arrangements and under provision of car parking spaces, the Board is not satisfied on the basis of the information provided that the site could be safely accessed by emergency services vehicles. The proposed development could give rise to overspill car parking within the site and along the laneway, which would result in a traffic hazard and endanger the safety of future occupants of the development and neighbouring houses in the event of an emergency. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.
2. Having regard to the provisions of the Department of Environment, Heritage and Local Government's Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (Cities, Towns and Villages) 2009, the Department of Transport, Tourism and Sport's Design Manual for Urban Roads and Streets 2013 and to the South County Dublin Development Plan 2016 to 2022, and in particular the criteria set out in section 11.3.2 (i) and (iii) in relation to Infill Sites and Backland Development, the proposed development would provide for a substandard layout that would not address the site constraints, integrate with the surrounding residential areas or provide for a good quality residential environment because of the position and layout of the proposed terrace. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.

3. Having regard to the provisions of the South County Dublin Development Plan 2016 to 2022 and to the nature, scale and layout of the proposed development and its proximity to the site boundaries, the proposed development would have an adverse impact on the residential amenities of the neighbouring house to the north by way of overlooking, loss of privacy and general disturbance. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.

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Karla Mc Bride

Senior Planning Inspector

19<sup>th</sup> September 2019