



An  
Bord  
Pleanála

## Inspector's Report ABP 304939-19

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| <b>Development</b>                  | Construction of dwelling to the rear of the existing dwelling, new vehicular driveway access. |
| <b>Location</b>                     | Outlands House, Rathbeale Road, Swords, Co. Dublin.   |
| <b>Planning Authority</b>           | Fingal County Council   |
| <b>Planning Authority Reg. Ref.</b> | F18A/0732   |
| <b>Applicant</b>                    | Robert and Eadaoin Garrigan   |
| <b>Type of Application</b>          | Permission  |
| <b>Planning Authority Decision</b>  | Grant Permission with Conditions  |
| <b>Type of Appeal</b>               | Third Party   |
| <b>Appellant(s)</b>                 | Margaret Robinson   |
| <b>Observer(s)</b>                  | None  |
| <b>Date of Site Inspection</b>      | 20 <sup>th</sup> September 2019.  |
| <b>Inspector</b>                    | Brendan Coyne   |



## 1.0 Site Location and Description

1.1. The site is located on the northern side of the Rathbeale Road, and has a stated area of 0.1 hectares. The site contains a two storey detached dwelling known as 'Outlands House', with a single storey detached garage to its western side. The roof profile of the dwelling is hipped and its elevation finishes comprise rendered cladding. A vehicular driveway provides access to the side and rear of the dwelling. The front and rear gardens of the dwelling are lawned, with the northern section of the rear garden planted with mature trees. A block wall c. 2m high, mature deciduous trees and hedgerow define the side and rear boundaries of the site. Lands adjoining the site to the east comprise a two storey detached dwelling (No. 1 St. Andrew's Park) and an area of public open space. The site to the rear/north of the site contains a two storey detached dwelling (No. 11 St. Andrew's Park). Lands adjoining the site to the west contain a single storey detached dwelling.

## 2.0 Proposed Development

2.1. Application as lodged on the 18<sup>th</sup> December 2018 - Permission sought for the following;

- Construction of a detached 2 storey 4 no. bedroom dwelling (246 sq.m.) to the rear of the existing dwelling,
- New vehicular access off the Rathbeale Road and driveway, serving the proposed new dwelling
- The provision of a new 1.8m high wall, subdividing the site between the existing and proposed new dwelling.

Revised Proposal as submitted by way of Further Information on the 31<sup>st</sup> May 2019:

- Omission on the proposed new vehicular access off the Rathbeale Road.
- The existing vehicular entrance will be shared, serving both the existing and proposed new dwelling, with a new driveway serving the proposed new dwelling.
- The height of the proposed dwelling has been reduced by 760mm to a ridge height of 7.9m

- The length of the dwelling has been reduced and the originally proposed living area has been omitted reducing the overall length of the proposed dwelling by 4.4m.

## **3.0 Planning Authority Decision**

### **3.1. Decision**

Fingal County Council granted permission for the proposed development, as amended by way of Further Information submitted on the 31<sup>st</sup> May 2019, subject to 11 no. Conditions. Of these, Conditions of note are as follows;

- C.2 a) Existing trees and hedgerows along the site side boundaries shall be retained and protected.
- C.3 The 1.8 metre block wall proposed alongside Outlands House shall not project forward of the front building line of Outlands House on site.
- C.6 a) Prior to commencement of development, the developer/applicant shall submit a revised site layout plan illustrating the front boundary set back 6 metres from the roadside kerb along the frontage of the proposed development. This setback shall be kept free of permanent development, and existing landscaping to be maintained by the applicant/developer.

### **3.2. Planning Authority Reports**

#### **3.2.1. Planning Report**

Initial Report (12<sup>th</sup> February 2019)

- The existing and proposed site layout plans submitted do not accurately show the footprint of the neighbouring dwelling No. 1 St Andrews Park. Additional Information requested addressing this issue.
- The Planning Authority has serious concerns regarding the scale and height of the proposed dwelling, given its backland location. Additional Information requested, to provide revised drawings showing a significant reduction in both

the scale and height of the proposed dwelling and a greater separation distance provided between the proposed dwelling and the neighbouring dwelling to the east, No. 1 St. Andrews Park.

- A new vehicular entrance is proposed onto the R125 Rathbeale Road. It is an objective of the Development Plan (DMS126) to restrict unnecessary new access directly off regional roads. The applicant is requested to submit by way of Further Information, a revised layout plan indicating the existing vehicular access as a shared vehicular access, serving both the existing and proposed new dwelling. Revised drawings to be submitted should show wayleaves and sightlines.
- The Rathbeale Road is included in the *Greater Dublin Area Cycle Network Plan* and the proposed cycle network for Swords and Malahide are detailed in Map 9 (Part 4C) and includes a proposed primary/secondary cycle route 'Route SW4' along this section of the Rathbeale Road. There is an existing setback along the front of the site which varies in width but is a minimum of 3 metres. The Transportation Section Report states that given the designation under the Cycle Network Plan, it would be reasonable to expect that the existing setback along the front boundary, within the blue line boundary of the site, is maintained and increased to allow for the future provision of a cycle track. The Transportation Section recommends the entire front boundary be setback a minimum of 5 metres from the road edge to allow for the future provision of a 2 metre footpath, 2 metre cycle path and 1 metre verge.
- No landscape plan was submitted. Additional Information requested to provide a Landscape Plan showing the retention of existing trees and hedgerow along the site boundaries and additional planting provided along the site boundaries to provide additional screening of the proposed development.
- Further information requested regarding foul drainage, surface water drainage and water supply serving the proposed development.

Second Report (25<sup>th</sup> June 2019)

- Significant Further Information received.

- The height of the proposed dwelling has been reduced by 760mm to a ridge height of 7.9m, to align with the ridge height of No. 1 St. Andrews Park. This has been achieved by reducing the pitch of the roof, along with omitting the rear dormer window and the omission of the originally proposed attic rooms.
- The length of the dwelling has been reduced and the originally proposed living area has been omitted reducing the overall length of the proposed dwelling by 4.4m, which allows greater separation distances to both adjacent boundaries with the south-eastern boundary distance increasing from 2.3m to 4m and the north-western boundary distance increasing from 2.3m to 6.8m.
- A revised site layout plan with sightlines indicated has been submitted showing a shared vehicular entrance serving both the existing and proposed dwelling, with separate driveways serving each house.

### 3.2.2. **Other Technical Reports**

### 3.2.3. ***Transportation Planning Section:***

No objection subject to Condition requiring (interalia) the following;

- (i) A 6m setback from the roadside kerb along the frontage of the proposed development shall be kept free of permanent development and made available for a cycle route along this section of the Rathbeale Road when the project is under construction.

### 3.2.4. ***Water Services Section:***

No objection subject to Conditions.

### 3.2.5. ***Irish Water:***

No objection subject to Conditions.

## 4.0 **Planning History**

4.1.1. None recorded.

## 5.0 **Policy and Context**

**Fingal County Development Plan 2017-2023**

- Zoning:** The site is zoned objective 'RS' which seeks 'to provide for residential development and protect and improve residential amenity'.
- Objective PM44** Encourage and promote the development of underutilised infill, corner and backland sites in existing residential areas subject to the character of the area and environment being protected.
- Objective PM45** Promote the use of contemporary and innovative design solutions subject to the design respecting the character and architectural heritage of the area.
- Objective PM65** Ensure all areas of private open space have an adequate level of privacy for residents through the minimisation of overlooking and the provision of screening arrangements.
- Chapter 12** Development Management Standards
- Objective DMS24** Require that new residential units comply with or exceed the minimum standards as set out in Tables 12.1, 12.2 and 12.3.
- Objective DMS2** A separation distance of a minimum of 22 metres between directly opposing rear first floor windows shall generally be observed unless alternative provision has been designed to ensure privacy. In residential developments over 3 storeys, minimum separation distances shall be increased in instances where overlooking or overshadowing occurs.
- Objective DMS29** Ensure a separation distance of at least 2.3 metres is provided between the side walls of detached, semi-detached and end of terrace units.
- Objective DMS39** New infill development shall respect the height and massing of existing residential units. Infill development shall retain the physical character of the area including features such as boundary walls, pillars, gates/gateways, trees, landscaping, and fencing or railings.
- Objective DMS44** Protect areas with a unique, identified residential character which provides a sense of place to an area through design,

character, density and/or height and ensure any new development in such areas respects this distinctive character.

**Objective DMS87** Ensure a minimum open space provision for dwelling houses (exclusive of car parking area) as follows:

- 3 bedroom houses or less to have a minimum of 60 sq.m. of private open space located behind the front building line of the house.
- Houses with 4 or more bedrooms to have a minimum of 75 sq.m. of private open space located behind the front building line of the house.

Narrow strips of open space to the side of houses shall not be included in the private open space calculations.

**Objective DMS126** Restrict unnecessary new accesses directly off Regional Roads. Ensure premature obsolescence of all county/local roads does not occur by avoiding excessive levels of individual entrances. Ensure that necessary new entrances are designed in accordance with DMRB or DMURS as appropriate, thereby avoiding the creation of traffic hazards.

**Table 12.8** Car Parking Standards

**Objective MT14** The Council will work in cooperation with the NTA and adjoining Local Authorities to implement the *Greater Dublin Area Cycle Network Plan* subject to detailed engineering design and the mitigation measures presented in the SEA and Natura Impact Statement accompanying the NTA Plan.



## 5.1. **Natural Heritage Designations**

None

## 6.0 **Environmental Impact Assessment - Preliminary Examination**

- 6.1.1. Having regard to the existing development on site, the limited nature and scale of the proposed development and the absence of any connectivity to any sensitive location, 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.

## 7.0 **The Appeal**

### 7.1. **Grounds of Appeal**

- 7.1.1. A third-party appeal was received from Margaret Robinson who resides at No.1, St. Andrews Park, which is the detached house immediately to the east of the appeal site. The following concerns were raised in the grounds of appeal:

- The proposed development would result in significant overlooking of the private open space of No. 1 St. Andrews Park and surrounding dwellings in St. Andrews Park estate.
- The proposed development would seriously injure the residential amenity of No. 1 St. Andrews Park and surrounding dwellings in St. Andrews Park and would be contrary to the proper planning and sustainable development of the area. The proposed development would not be consistent with the zoning objective of the site which seeks to 'protect, provide and improve residential amenities'.
- The appellant expresses concern regarding the 'backland' nature and layout of the proposed development, having regard to the layout and building line of dwellings within St. Andrews Park.

### 7.2. **Applicant Response**

7.2.1. Kevin Hughes, of Hughes Planning & Development Consultants, has responded on behalf of the applicant to the third-party grounds of appeal, as follows;

- The proposed development would not result in overlooking of neighbouring dwellings, by reason of the following;
  - A separation distance of 22m would be maintained between the front elevation of the proposed dwelling and the rear elevation of Outlands House.
  - The proposed dwelling would maintain a setback of 11m from the side gable elevation of dwelling No. 11 St. Andrews Park. The gable end of No. 11 does not contain any windows that would give rise to overlooking of the proposed dwelling. It is considered that the proposed dwelling would not result in overlooking of No. 11 St. Andrews Park.
  - The proposal would maintain a 4m setback from the boundary shared with dwelling No. 1 St. Andrews Park. This dwelling does not have any windows serving habitable rooms on its side elevation, therefore overlooking would not occur of the proposed dwelling. It is proposed to provide obscure glazing on the first floor ensuite window of the side elevation of the proposed dwelling to improve privacy and reduce the potential of overlooking into the private amenity space of No. 1 St. Andrews Park.
  - Overlooking would not occur between the proposed dwelling and the neighbouring dwelling to the west
  - Condition No. 2 of the grant of permission by the Planning Authority requires that existing trees and hedgerow along the side boundaries shall be retained and protected. This condition will result in further mitigation measures to protect the residential amenity of No. 1 St. Andrews Park.
- Due to the siting and height of the proposed development, there will be no overshadowing of neighbouring dwellings. The height of the proposed dwelling aligns with the height of No. 1 St. Andrews Park.
- The proposed development has successfully struck a balance between the protection of amenities, privacy, the established character of the area and the

new residential dwelling. The proposed development is consistent with Development Plan policy and NPF National Policy Objectives regarding consolidating development in urban areas, backland sites, design, increasing density and the delivery of housing.

- The proposed development makes efficient use of a backland site within the built-up area of Swords.

### 7.3. **Planning Authority Response**

- An Bord Pleanála is referred to the Planning Authority's report and the relevant Conditions of the grant of permission, which address the issues raised in the Ground of Appeal.
- A discrepancy is noted between the first report received from the Transportation Section, which stated that the entire front boundary should be setback a minimum of 5 metres from the road edge and the subsequent Transportation Report received following the receipt of Additional Information which recommended a condition be attached requiring a 6 metre setback from the roadside kerb. Therefore Condition 6 of F18A/0732 was attached requiring a 6 metre setback. The Transportation Section have clarified that a 5 metre setback would be acceptable in any revised Condition.

### 7.4. **Observations**

None

## 8.0 **Assessment**

8.1.1. The relevant planning issues in this appeal relate to;

- Overlooking
- Overshadowing
- Backland Development
- Compliance with Development Plan Residential Standards

These are addressed below.

## 8.2. **Overlooking**

- 8.2.1. The third-party appellant expresses concern that the proposed development would result in overlooking of the private open space of neighbouring dwelling to the east, No. 1 St. Andrews Park and surrounding dwellings within St. Andrews Park estate.
- 8.2.2. A separation distance of 22m would be maintained between the front elevation of the proposed dwelling and the rear elevation of 'Outlands House'. This complies with the requirements of Section 12.4 of the Fingal County Development Plan which requires a minimum standard of 22 metres separation distance between directly opposing rear first floor windows. As such no undue overlooking would occur between Outlands House and the proposed new dwelling.

A separation distance of 5.5m would be maintained between the south-eastern side elevation of the proposed dwelling and the western side elevation of No. 1 St. Andrews Park. The proposal would provide 1 no. obscure glazed window ope on its side elevation at first floor level. Given that this window ope would be glazed with obscure glass and having regard to the position/layout of the proposed dwelling relative to neighbouring dwelling No. 1 St. Andrews Park, it is considered that the proposal would not adversely impact on the residential amenity of No. 1 St. Andrews Park by way of overlooking. The 2m high boundary wall, trees and hedging along the boundary of the site would prevent overlooking at ground level.

The proposal would maintain a setback of 6.8m from the western side boundary of the site. Given that no window opes are provided on the side north-western elevation of the proposed dwelling at first floor level, overlooking would not occur of the private amenity space to the rear of the dwelling on the adjoining site to the west. The 2m high boundary wall, tress and hedging along the boundary of the site would prevent overlooking at ground level.

The proposed dwelling would maintain a first floor level setback of 11m from its rear elevation and the northern rear boundary of the site, shared with neighbouring dwelling No. 11 St. Andrews Park. This separation distance generally accords with the requirements of Section 12.4 of the Fingal County Development Plan which refers to separation distances and states that 'a minimum standard of 22 metres separation between directly opposing rear first floor windows shall be observed,

normally resulting in a minimum rear garden depth of 11 metres'. Given a) that there are no window openings serving habitable rooms on the southern side elevation of dwelling No. 11 St. Andrews Park at first floor level, b) the 11m depth of the rear garden of the proposed dwelling, c) the screening of trees to be maintained along the rear northern boundary and c) the position of the dwelling relative to dwelling No. 11, it is considered that the proposed dwelling would not adversely impact on the residential amenity of dwelling No. 11 St. Andrews Park by way of overlooking.

- 8.2.3. As such, it is considered that the proposed development is consistent with Objective DMS28 of the Development Plan. I recommend, therefore, that the ground of appeal should not be upheld.

### **8.3. Overshadowing**

- 8.3.1. The third-party appellant expresses concern that the scale and height of the proposed dwelling would result in overshadowing of neighbouring dwellings.

- 8.3.2. The roof ridge height of the proposed dwelling, as revised by way of further information submission to the Planning Authority, is 7.9 metres. This aligns with the roof ridge height of dwelling No. 1 St. Andrew's Park. It is noted that the ridge height of existing dwelling 'Outlands House' is 8.9m and the height of the dwelling on the adjoining site to the west is 7.7m. The roof profile of the proposed dwelling is pitched, with gable ends.

The proposed dwelling has a depth of 13.3m. and is orientated on a north-east/south-west axis. The separations distances provided between the proposed dwelling and the existing dwellings to its sides, front and rear are set out under Section 7.2.2 above.

- 8.3.3. Having regard to the context and orientation of the site and the layout, scale and height of the proposed dwelling in relation to the dwellings to the front, side and rear, it is considered that the proposed dwelling would not adversely impact on the residential amenity of these dwellings by way of overshadowing. I recommend therefore, that the proposed development is not refused permission on the issue of overshadowing.

#### 8.4. Backland Development

- 8.4.1. The site is located in an area zoned 'RS' with the objective to 'provide for residential development and protect and improve residential amenity'.
- 8.4.2. The proposal provides for the construction of a detached 2 storey dwelling located to the rear of existing dwelling 'Outlands House'. The proposed dwelling would be accessed via a shared vehicular access serving the existing dwelling, with separate driveways serving both dwellings. Given its location to the rear of 'Outlands House', it is considered that the proposed dwelling would constitute backland development.
- 8.4.3. Objective PM44 of the Fingal County Development Plan seeks to encourage and promote the development of backland sites in existing residential areas subject to the character of the area and environment being protected. The Development Plan recognises that a balance is needed between the protection of amenities, privacy, the established character of the area and new residential infill / backland development.
- 8.4.4. Having reviewed the drawings submitted, it is my view that the proposed development would provide an acceptable form of backland development by reason of the following;
- The existing dwelling 'Outlands House' has a large garden plot with a rear garden depth of 42m and width of 24.5m, which has the capacity to accommodate another dwelling.
  - As detailed above, the proposed dwelling would not adversely impact the residential amenity of neighbouring dwellings to the front, sides and rear by way of overlooking or overshadowing.
  - The position of the dwelling would not conflict with the building line of dwellings to the side and rear within St. Andrews Park. The proposal, therefore, would not adversely impact on the character of the surrounding area.
  - The proposal would provide an additional dwelling, thereby increase the density of the subject site.
  - The proposed dwelling accords with Development Plan Development Management Standards for residential development, re. minimum gross floor

area, room sizes, separation distances, private amenity space etc. (detailed further below under Section 7.5)

- The site provides adequate car parking and acceptable shared vehicular access from the Rathbeale Road. 2 no. car parking spaces would be provided to the front of the proposed 4-bedroom dwelling. This complies with the requirements of Table 12.8 – Car Parking Standards of the Fingal County Development Plan, which requires the provision of 2 car parking spaces for 3+ bedroom houses, in urban/suburban areas. It is noted that the Transportation Section of Fingal County Council outlines no objections to the proposed development subject to Conditions.

As such, it is my view that the location of the proposed dwelling to the rear of an existing dwelling with a large garden is an acceptable form of backland development, in accordance with Objective PM44 of the Development Plan which seeks to encourage and promote the development of underutilised backland sites in existing residential areas, subject to the character of the area and environment being protected.

## 8.5. Compliance with Development Plan Residential Standards

Whilst not detailed in the grounds of appeal, I consider it appropriate to assess whether or not the proposal accords with Development Plan development management standards. This is addressed under the sub-headings below accordingly;

- 8.5.1. **Internal Floor Areas:** The floor area of the proposed 4 bedroom 6 person dwelling, at 192 sq.m., complies with the requirements of Table 12.1 of the Development Plan which requires a minimum of 95 sq.m. for a 4 bed. / 6 person single storey house.
- 8.5.2. **Private Amenity Space:** The private amenity to be provided to the rear of the proposed dwelling is approx. 185 sq.m. and the private amenity space to be maintained to the rear of the existing dwelling is approx. 204 sq.m. This complies with the requirements of Objective DMS87 of the Development Plan which requires a minimum of 75 sq.m. for a 4-bedroom dwelling.

8.5.3. **Elevation Treatment:** The elevation drawings submitted detail that the material and finishes to be used on the elevations of the proposed dwelling would comprise of render finishing and blue/black roof tiles. This is acceptable.

**Boundary Treatment:** The proposal provides a 0.9m high boundary wall to the front of Outlands House, subdividing the site from the proposed new driveway serving the proposed new dwelling. This wall continues as a 1.8m high boundary wall from the side of Outlands House, subdividing the remainder of the site between the existing and proposed new dwelling. It is noted that the Planning Authority conditioned the 1.8m high boundary wall not project forward of the front building line of Outlands House. In the interest of privacy, personal safety and visual and residential amenity, this is considered acceptable.

## 8.6. Screening for Appropriate Assessment

Having regard to nature and scale of the proposed development to provide one additional house in a fully serviced and zoned residential area and the nature of the receiving environment and the distance and lack of connections to the nearest European sites: Malahide Estuary SPA (site code: 004025), no Appropriate Assessment issues arise and it is not considered that the proposed development would be likely to have a significant effect individually or in combination with other plans or projects on a European site.

## 9.0 Recommendation

9.1. I recommend that permission be granted subject to conditions, for the reasons and considerations below.

## 10.0 Reasons and Considerations

10.1. Having regard to the residential land use zoning of the site, the pattern of development in the area, the size of the site and the layout and design of the proposed development, it is considered that, subject to compliance with the Conditions set out below, the proposed development would not adversely impact on



the residential amenity of the area and would be acceptable in terms of traffic safety and convenience. The proposed development would, therefore, be in accordance with the proper planning and sustainable development of the area.

## 11.0 Conditions

1. The development shall be carried out and completed in accordance with the plans and particulars lodged with the application, as amended by the further plans and particulars submitted on the 31<sup>st</sup> day of May 2019, except as may otherwise be required in order to comply with the following conditions. Where such conditions require details to be agreed with the planning authority, the developer shall agree such details in writing with the planning authority prior to commencement of development and the development shall be carried out and completed in accordance with the agreed particulars.

**Reason:** In the interest of clarity.

2. Water supply and drainage arrangements, including the disposal of surface water, shall comply with the requirements of the planning authority for such works and services.

**Reason:** In the interest of public health.

3. The applicant or developer shall enter into water and/or wastewater connection agreement(s) with Irish Water prior to the commencement of this development.

**Reason:** In the interest of public health.

4. (a) The boundary wall located to the front of the existing 'Outlands House' along

the vehicular access serving the proposed dwelling shall not exceed a height of 900mm.

- (b) Prior to commencement of development the applicant / developer shall submit for the written agreement of the Planning Authority a revised site layout plan illustrating the front boundary of the site along the Rathbeale Road set back 5 metres from the roadside kerb. This setback area shall be

kept free of permanent development, and existing landscaping shall be maintained by the applicant / developer.

- (c) No objects, structures or landscaping shall be placed or installed within the visibility triangle exceeding a height of 900mm, which would interfere with or obstruct (or could obstruct over time) the required visibility envelopes.
- (e) All underground or overhead services and poles shall be relocated, as may be necessary, to suitable locations at the applicant / developer's expense.
- (f) All the above works shall be carried out prior to occupation of the development and at the developer's expense according to the Specification and Conditions of the Planning Authority.

**Reason:** In the interest of traffic and pedestrian safety and to enable the future provision of the Rathbeale Road cycle route.

- 5. (a) Existing trees and hedgerows along the side and rear boundaries of the site shall be retained and protected.

**Reason:** In the interest of residential and visual amenity.

- 6. All service cables associated with the proposed development (such as electrical, telecommunications and television) shall be located underground. Ducting shall be provided by the developer to facilitate the provision of broadband infrastructure within the proposed development.

**Reason:** In the interest of visual and residential amenity.

- 7. Site development and building works shall be carried out only between the hours of 0800 to 1900 Mondays to Fridays inclusive, between 0800 to 1400 hours on Saturdays and not at all on Sundays and public holidays. Deviation from these times will only be allowed in exceptional circumstances where prior written approval has been received from the planning authority.

**Reason:** In order to safeguard the residential amenities of property in the vicinity.

- 8. The developer shall pay to the planning authority a financial contribution in respect of public infrastructure and facilities benefiting development in the area of the planning authority that is provided or intended to be provided by or on behalf

of the authority in accordance with the terms of the Development Contribution Scheme made under section 48 of the Planning and Development Act 2000, as amended. The contribution shall be paid prior to commencement of development or in such phased payments as the planning authority may facilitate and shall be subject to any applicable indexation provisions of the Scheme at the time of payment. Details of the application of the terms of the Scheme shall be agreed between the planning authority and the developer or, in default of such agreement, the matter shall be referred to An Bord Pleanála to determine the proper application of the terms of the Scheme.

**Reason:** It is a requirement of the Planning and Development Act 2000, as amended, that a condition requiring a contribution in accordance with the Development Contribution Scheme made under section 48 of the Act be applied to the permission.

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Brendan Coyne  
Planning Inspector  
04<sup>th</sup> October 2019