



An
Bord
Pleanála

S. 6(7) of Planning and Development (Housing) and Residential Tenancies Act 2016

Inspector's Report on Recommended Opinion

306875

Strategic Housing Development	242 residential units (86 houses, 156 apartments), childcare facility and associated site works.
Location	Old Slane Road, Mell/Tullyallen, Drogheda, Co. Louth.
Planning Authority	Louth County Council.
Prospective Applicant	Loughdale Properties Ltd.
Date of Consultation Meeting	22 May 2020.
Date of Site Inspection	6 May 2020.
Inspector	Stephen Rhys Thomas.

1.0 Introduction

Having regard to the consultation that has taken place in relation to the proposed development and also having regard to the submissions from the planning authority, the purpose of this report is to form a recommended opinion as to whether the documentation submitted with the consultation request under section 5(5) of the Planning and Development (Housing) and Residential Tenancies Act 2016 - (i) constitutes a reasonable basis for an application under section 4, or (ii) requires further consideration and amendment in order to constitute a reasonable basis for an application under section 4.

2.0 Site Location and Description

The site, with a stated area of 9.94ha, is located immediately adjacent to the grade-separated M1 Motorway/N51 National Secondary Road (Drogheda North Interchange) – on the western outskirts of the town of Drogheda, within County Louth. The site is some 2.5km from the town centre. To the west of the site lies the slip-road for southbound traffic to the M1 motorway – the boundary comprises deciduous screen planting on the motorway side of the fence. To the north of the site is the R168 – the boundary with which is a timber post and rail fence, overgrown by mature hedgerow. There is an agricultural access to the site from the R168. There is a wide margin between the fence-line and the edge of the carriageway. The road is located some 1-3m above the level of the site. To the east, the site abuts the Kenny Stream (flowing south towards the River Boyne 550m away). The stream is within a deep ravine, the eastern side of which is wooded. A portion of the eastern bank of the stream is in the ownership of the applicant. The stream was altered during construction of the M1 motorway, as it passes under the R168. The M1 Drogheda Retail Park is located to the east of the site – on the opposite side of the intervening ravine. To the south of the Retail Park, the appeal site abuts agricultural land and houses. The site adjoins the Old Slane Road and also includes an overgrown laneway located between houses.

The R168 is a two-way carriageway with a hard shoulder in the vicinity of the site – being a realignment constructed in association with the M1 motorway interchange. It crosses the Kenny Stream on a substantial embankment. There are roundabouts located to west (Drogheda North Interchange) and east (Hill of Rath). The road is

flanked by hard shoulders and crash barriers – a crash barrier extending roughly half the length of the site frontage. There is public lighting in place. There are no public footpaths – the nearest section of the public footpath network being located at the Hill of Rath roundabout to the east. The difference in levels between the site and the R168 results in a drop of approximately 3m from the road to the site. The Old Slane Road passes to the south of the site. There are no public footpaths and there is no public lighting on this stretch of the road. There are intermittent stretches of footpath on the Old Slane Road between the site and Leonard's Cross to the east.

The Old Slane Road passes beneath the M1 motorway in a narrow restricted underpass which permits only one-way traffic at a time. Height barriers have been erected to allow only car traffic through the underpass. Notwithstanding this restricted access, the underpass is steadily used by local car traffic.

The site is currently laid out in grassland; sloping generally downhill from northwest to southeast with an overall fall variously stated as being 10m, 15m and 21m. The stream on the eastern boundary is in deep cut at the northern end of the site – being only in slight cut at the location where it leaves the site at its southern end. There are the remains of some hedgerows on the site – none of which are of particular note. There is row of mature fir trees to the west of a group of dilapidated farm buildings at the southern end of the site. There are two sets of 10kV power lines traversing the site from east to west. The lines are above ground where they traverse the eastern side of the site. There is a 38kV line traversing the northwestern portion of the site. There are views from the site of the cable-stayed M1 bridge over the River Boyne to the south.

3.0 Proposed Strategic Housing Development

The proposed development which is subject of this pre-application consultation request comprises 242 residential units provided in a combination of houses and apartments, on 9.94 Hectares as follows:

156 units in duplex/apartment buildings of up to 5 storeys, as follows:

- 1 bed apartments 19 units
- 2 bed apartments 102 units
- 3 bed apartments 35 units

86 houses:

- 2 bedroom – 1 unit
- 3 bedroom - 64 units
- 4 bedroom - 21 units

Total % breakdown by unit:

- 1 bedroom 20 units (8%)
- 2 bedroom 102 units (42%)
- 3 bedroom 99 units (41%)
- 4 bedroom 21 units (9%)

Childcare facility, standalone three storey building – 485 sqm, to accommodate 67 children.

384 car parking spaces, 267 bicycle spaces.

Vehicular access is from the Old Slane Road with additional cycle/pedestrian access from the R168 to the north. Improvements to the Old Slane Road and R168 to include road, footpath provision and junction amendments.

Open space provision – 8,927 sqm (14.7%).

The proposed density is stated at 40 units per Hectare (Net site area 6.04 Hectares).

4.0 National and Local Policy

4.1 Section 28 Ministerial Guidelines

Having considered the nature of the proposal, the receiving environment, the documentation on file, including the submissions from the planning authority, I am of the opinion that the directly relevant S.28 Ministerial Guidelines are:

- 'Urban Development and Building Heights Guidelines for Planning Authorities' - 2018
- 'Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities' - 2018

- ‘Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas’ (including the associated ‘Urban Design Manual’) 2009
- ‘Design Manual for Urban Roads and Streets’ 2013 (as amended)
- ‘The Planning System and Flood Risk Management’ (including the associated ‘Technical Appendices’)

‘Childcare Facilities – Guidelines for Planning Authorities’ 2001

Other relevant national guidelines include:

- Framework and Principles for the Protection of the Archaeological Heritage Department of Arts, Heritage, Gaeltacht and the Islands 1999.

4.2 Regional Policy

The Regional Social and Economic Strategy for the Eastern and Midlands Region 2019-2031 (RSES) identifies Drogheda as a Regional Growth Centre within the Core Region of the Eastern and Midland Region. An element of the growth strategy is to target growth of the regional growth centres, including Drogheda, as regional drivers and to facilitate the collaboration and growth of the Dublin-Belfast Economic Corridor, which connects the large towns of Drogheda, Dundalk and Newry.

The RSES aims to enable Drogheda to realise its potential to grow to city scale, with a population of 50,000 by 2031 through the regeneration of the town centre, the compact and planned growth of its hinterland and through enhancement of its role as a self-sustaining strategic employment centre on the Dublin-Belfast Economic Corridor.

The following regional policy objectives are noted:

- RPO4.11 – A cross boundary statutory Joint Urban Area Plan (UAP) for the Regional Growth Centre of Drogheda shall be jointly prepared by Louth and Meath County Councils in collaboration with EMRA.
- RPO4.14 - promote self-sustaining economic and employment-based development opportunities to match and catch-up on rapid phases of housing delivery in recent years to provide for employment growth and reverse commuting patterns.
- RPO 4.15 - Promote Drogheda as an urban tourism destination while protecting its natural and built heritage resources.

Local Policy

The Louth County Development Plan 2015-2021, is the operative county development plan and contains general policies and objectives in relation to residential amenity standards. The County Development Plan provides the basis for the settlement strategy of the county and Drogheda is designated as a 'Large Growth Town'.

The site is zoned Objective Residential – To provide for residential use in accordance with approved Masterplan, in the North Drogheda Environs Local Area Plan – 2002.

The site is not located within the boundaries of the Drogheda Borough Council Development Plan 2011-2017 (extended) and due for review on foot of the implementation of the National Framework Plan.

5.0 Planning History

Subject site

- PA reference **08/1148** and ABP reference **PL15-235241**. Permission refused for a mixed use development comprising of creche, retail/community building, 354 no. residential units and associated works. Traffic and pedestrian safety reasons.

5.1.1. Section 247 Consultation(s) with Planning Authority

It is stated by the prospective applicants in the submitted documentation that a Section 247 pre-application consultation took place with the planning authority on the 9 October 2019.

6.0 Forming of an Opinion

- 6.1.1. Pursuant to section 6(7) of the Act of 2016, regard is had in the forming of the opinion to the documentation submitted by the prospective applicant; the planning authority submissions and the discussions which took place during the tripartite consultation meeting. I shall provide a brief detail on each of these elements hereunder.

Documentation Submitted

- 6.1.2. The prospective applicant has submitted information pursuant to section 5(5)(a) of the Planning & Development (Housing) and Residential Tenancies Act 2016 and Article 285 of the Planning and Development (Strategic Housing Development) Regulations 2017.
- 6.1.3. The information submitted included the following: Cover Letter, SHD Application Form, Part V proposal and drawings, Consent Letters from Louth and Meath County Council, Transport Statement, Archaeological Impact Assessment, Flood Risk Assessment, Statement of Stakeholder Involvement Statement, DMURS statement, Statement of Consistency and Material Contravention Statement, Engineering Assessment Report, Screening Report for Appropriate Assessment and NIS, Landscape and Visual Assessment Report, Design Statement, Pre-Planning Application A3 Booklet including Part V drawings, Engineering Drawings and a confirmation of feasibility from Irish Water.
- 6.1.4. I have reviewed and considered all of the above mentioned documents and drawings.

Planning Authority Submission

- 6.1.5. In compliance with section 6(4)(b) of the 2016 Act the planning authority for the area in which the proposed development is located, Louth County Council, submitted a note of their section 247 consultations with the prospective applicant and also submitted their opinion in relation to the proposal. These were received by An Bord Pleanála on 28 April 2020.
- 6.1.6. The planning authority's 'opinion' included the following matters: a description of the site and surroundings, a brief overview of the proposed development, planning history, the zoning provisions of the Development Plan and any specific objectives for the area and a list of relevant national policy documents. The planning authority's comments included the following:
- 6.1.7. National and Regional policy framework – the site is located on zoned land adjoining the built footprint of Drogheda and accords with the sequential urban growth aims of national policy and the RSES.
- 6.1.8. North Drogheda Environs LAP 2002 (NDALAP) – the site is located on lands zoned residential in the LAP and will provide development at an appropriate density with connections to the town centre.

- 6.1.9. Core Strategy and Phasing – factors to consider include Variation 1 of the Drogheda Borough Council Development Plan 2011-2017 and Variation 1 of the Louth County Development Plan 2009-2015. The existing core strategy is outdated, appropriate levels of development have not been delivered on phase 1 lands, the proposal is a material contravention of the core strategy but the lands are well located and will consolidate the town.
- 6.1.10. Part V – phased delivery of units is preferred and further engagement with the housing section is recommend.
- 6.1.11. Height and Density – the proposed residential density of 40 units per hectare is acceptable. The rationale for building height throughout the site is not well explained, there is an opportunity to provide beneficial overlooking of the parkland/ravine sector of the site.
- 6.1.12. Housing Mix and Phasing - the housing mix is satisfactory, however, the distribution of the apartments could be better as there is a fear that as the last phase of development apartment units will not be delivered.
- 6.1.13. Urban Design and Layout – pedestrian connections along the Old Slane Road and R168 are encouraged. Greater building height at the northern portion of the site is welcomed and a sensible approach. Passive surveillance of the ravine open space is preferred and the overall layout could be improved with DMURS principles. The quantum of open space is acceptable.
- 6.1.14. Access and Transport – the long spine road is problematic and not DMURS compliant, crash barriers along the road are not acceptable. The proposals to realign the Old Slane Road and R168 junction are not acceptable. The planned improvements along the Old Slane Road especially the provision of cycle lanes is questionable. The provision of a footpath from the northern portion of the site along the R168 is not acceptable as there are plans to widen the road at this location, an alternative link to the north should be explored.
- 6.1.15. Open Space – though the quantum of public open space is acceptable, its calculation is queried, especially in the context of the Mell Stream and ravine, the functionality of this space requires explanation. The provision of high noise walls along the western boundary to the M1 may overshadow open space areas. The inclusion of the applicant's other land holdings along the Mell stream in the overall landscape strategy should be considered. Communal open space afforded to the

apartment units requires greater examination in order to ensure acceptable daylight levels.

- 6.1.16. Childcare facility – the provision of a crèche is welcome, however, special attention should be directed at suitability of outdoor play space.
- 6.1.17. Noise and Light – the proposed development should ensure that noise and light intrusion from the M1 is properly assessed and appropriate measures planned for.
- 6.1.18. Visual Impact – given that the site is located close to a World Heritage Site, a Landscaping and Visual Impact Assessment is recommended.
- 6.1.19. EIA and AA – the extent of the site is close to the 10 Hectare trigger for the production of an EIAR and the submission of an NIS is noted.
- 6.1.20. The provision and findings of the SSFRA, Archaeological Impact Assessment are acceptable.
- 6.1.21. The planning authority conclude that the proposed development accords with the Development Plan zoning for the area, however, there are points of detail that require further consideration, specifically with regard to the overall development strategy for the site, public open space strategy and detail design. Other points of detail are also listed.

Submission from Irish Water

- 6.1.22. A submission was received from Irish Water and is appended to this report. In summary, the submission states that a Confirmation of Feasibility has issued and that connection to the water supply is possible without upgrades. In relation to wastewater, connection is feasible subject to a gravity sewer throughout the site draining to a new Pump Station discharging to the Irish Water network via a new rising main along the Slane Road. The developer is required to fund these infrastructure requirements. Irish Water will deliver the rising main in the public realm which will require a road opening licence. The developer will be required to deliver the necessary works within the site and will be responsible for obtaining any appropriate permissions required.

The Consultation Meeting

6.1.23. A section 5 Consultation meeting took place online via Microsoft Teams on the 22 May 2020, commencing at 2.30pm. Representatives of the prospective applicant, the planning authority and An Bord Pleanála were in attendance. An agenda was issued by An Bord Pleanála prior to the meeting.

6.1.24. The main topics raised for discussion at the tripartite meeting were based on the Agenda that issued in advance and contained the following issues:

1. Development Plan Context - Core Strategy and other objectives.
2. Site Linkages – improvements to the local road network and access from R168
3. Landscape Strategy – landscape design and open space usability
4. Unit Distribution and Phasing
5. Environmental, Natural and Cultural factors
6. Any other matters.

6.1.25. In relation to Development Plan Context - Core Strategy and other objectives, ABP representatives sought further elaboration/discussion on the status of the regional and local planning policy context. The planning authority acknowledged that existing local planning framework documents were out of date and a review is necessary. The prospective applicant reiterated their material contravention statement as it relates to the core strategy of the plan and phasing. The local planning context should be clearly outlined, both the planning authority and the prospective applicant agreed that development should occur at this location.

6.1.26. In relation to Site Linkages – improvements to the local road network and access from R168, ABP representatives sought further elaboration/discussion on the possibilities of linking the north of the site with the existing road network, bus stops and retail opportunities found at the retail park. This location for pedestrian connections was agreed as being important to connectivity and use of suitable forms of transport such as the bus. The planning authority outlined the need to preserve the traffic function of the R168 and the desirability of maintaining traffic flows over pedestrian connections was explained. The improvements along the Slane Road were clarified and it was agreed that a greater number of cross sections were required, to better understand the feasibility of providing the pedestrian and cyclist facilities envisaged by the prospective applicant. The PA noted that there had been

junction improvements at the southern end of the Slane Road, but further adjustments would be welcomed. Further engagement between the prospective applicant and the PA were encouraged to ensure the right solution to pedestrian connectivity were achieved.

- 6.1.27. In relation to Landscape Strategy – landscape design and open space usability, ABP representatives sought further elaboration/discussion on the strategy selected to incorporate the steep ravine that characterises the eastern portion of the site. Issues such as usability and passive supervision opportunities were explored. The usability and safety of some other open spaces was also queried, particularly the interface with the M1 and the lower part of Phase 4. The planning authority queried the accessibility of the ravine open space and sought opportunities for less formal paths and routes through this space. The prospective applicant explained the technical challenges of providing footpaths along the ravine feature and concluded that this area would be fenced off from access and left as visual landscape feature instead.
- 6.1.28. In relation to Unit Distribution and Phasing, ABP representatives sought further elaboration/discussion around the clarity of documentation in relation to the distribution of apartment units throughout the scheme. The planning authority outlined their concerns about the phasing plan and in particular the worry that apartment units would not be delivered. The prospective applicant outlined that the documentation would outline a clearer phasing strategy and that the location of the taller apartment structures at the north end of the site are an important gateway feature and are an integral part of the scheme.
- 6.1.29. In relation to Environmental, Natural and Cultural factors, ABP representatives sought further elaboration/discussion regarding the need for an EIAR and that all documentation in relation to EIA and AA should be consistent and without discrepancies. AA documentation should also take account of any road improvements.
- 6.1.30. In relation to Any Other Matters, ABP representatives reiterated the points already discussed and mentioned the importance of residential amenity related to apartment units, especially the usability of courtyard spaces.
- 6.1.31. Both the prospective applicant and the planning authority were given an opportunity to comment and respond to the issues raised by the representatives of ABP. Those comments and responses are recorded in the 'Record of Meeting 306875' which is

on file. I have fully considered the responses and comments of the prospective applicant and planning authority in preparing the Recommended Opinion hereunder.

7.0 Conclusion and Recommendation

Based on the entirety of the information before me, it would appear that the proposed development falls within the definition of Strategic Housing Development, as set out in section 3 of the Planning and Development (Housing) and Residential Tenancies Act 2016.

I have examined all of the information and submissions before me including the documentation submitted by the prospective applicants, the submissions of the planning authority and the discussions which took place at the tripartite meeting. I have had regard to both national policy, via the section 28 Ministerial Guidelines and local policy via the statutory plans for the area.

Having regard to all of the above, I recommend that the Board serve a notice on the prospective applicant, pursuant to Section 6(7)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016, stating that it is of the opinion that the documentation submitted with the consultation request under section 5(5) of the Act **requires further consideration and amendment** in order to constitute a reasonable basis for an application under section 4 of the Planning and Development (Housing) and Residential Tenancies Act 2016.

I would also recommend that the prospective applicant be notified, pursuant to article 285(5)(b) of the 2017 Regulations, that specified information (as outlined hereunder) be submitted with any application for permission that may follow. I believe the specified information will assist the Board at application stage in its decision-making process. I am also recommending that a number of prescribed bodies (as listed hereunder) be notified by the prospective applicant of the making of the application.

8.0 Recommended Opinion

An Bord Pleanála refers to your request pursuant to section 5 of the Planning and Development (Housing) and Residential Tenancies Act 2016. Section 6(7)(a) of the Act provides that the Board shall form an opinion as to whether the documents submitted with the consultation request (i) constitute a reasonable basis for an

application under section 4 of the Act, or (ii) require further consideration and amendment in order to constitute a reasonable basis for an application under section 4.

Following consideration of the issues raised during the consultation process, and having regard to the opinion of the planning authority, An Bord Pleanála is of the opinion that the documentation submitted **requires further consideration and amendment** to constitute a reasonable basis for an application for strategic housing development to An Bord Pleanála.

In the opinion of An Bord Pleanála, the following issues need to be addressed in the documents submitted to which section 5(5) of the Act of 2016 relates that could result in them constituting a reasonable basis for an application for strategic housing development:

1. Landscape strategy

Further consideration/justification of the documents as they relate to the design and layout of the residential development with particular regard to the landscape masterplan. The prospective applicant should satisfy themselves that the proposed design and layout provide the optimal urban design and landscape solution for this site and are of sufficient quality to ensure that the proposed development makes a positive contribution to the character of the area over the long term, having regard to the requirements of Design Manual for Urban Roads and Streets (DMURS), the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities' (2018) and 'Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas' (2009).

The submitted documents should allow for particular consideration of the site topography and the incorporation and usability of open space planned along the Kenny Stream and associated steep ravine. Access to and supervision of the landscape character around the ravine should be explored in greater detail and a rationale for its greater integration into the overall development should be considered. In addition, open spaces planned along the boundary of the M1 should demonstrate their usability in terms of passive surveillance from planned homes and impacts from proximity to the motorway. In all cases appropriate Computer Generated Images and cross-section drawings through the streets and open spaces

should be submitted to show changes in levels and inter alia, the interface of boundary treatments to public open spaces/streetscape.

The further consideration of these issues may require an amendment to the documents and/or design proposals submitted relating to the landscape design and layout of the proposed development.

2. Pedestrian and Cycle Connections

Further consideration/justification of the documents as they relate to access, pedestrian and cycle connections, in particular:

- a) The achievement of satisfactory pedestrian and cycle connections from the north of the site to commercial and retail amenities along the R168.
- b) A detailed report outlining any works to be undertaken to the Slane Road in terms of pedestrian and cycle facilities, public lighting and any road/footpath upgrade works necessary to facilitate the development and provide for appropriate connections to the wider area. The report should also detail who is going to undertake the works required and the timelines involved relative to the construction and completion of the proposed development. Letters of consent should be provided for any lands outside the control of the applicant and appropriately detailed cross sections at regular intervals should be provided.
- c) Any Traffic and Transport Assessment should include the impacts of utilising the local road to the east of the site (L95109-8), it is narrow and unsuitable for two way traffic. An assessment of traffic implications for this route as a result of the development is required.

The further consideration of this issue may require an amendment to the documents and/or design proposals submitted relating to the pedestrian and cyclist connections component of the proposed development.

Pursuant to article 285(5)(b) of the Planning and Development (Strategic Housing Development) Regulations 2017, the prospective applicant is hereby notified that, in

addition to the requirements as specified in articles 297 and 298 of the Planning and Development (Strategic Housing Development) Regulations 2017, the following specific information should be submitted with any application for permission:

1. A report that addresses issues of residential amenity specifically how the development will limit the potential for overlooking and overshadowing. The report should include full and complete drawings including levels and cross sections showing the relationship between the development and significant landscape features and open spaces, passive supervision opportunities over open space should be maximised. Particular attention should be paid to the centralised courtyards associated with apartment units, and any report should demonstrate the usability and attractiveness of these spaces as an appropriate amenity for future occupants.
2. A Traffic and Transport Assessment, including a mobility management plan, which would include specific and quantifiable measures to facilitate the demand for travel and for parking arising from the development, and information as to where the responsibility would lie for the ongoing implementation of each measure.
3. A report that specifically addresses the proposed materials and finishes and the requirement to provide high quality and sustainable finishes and details.
4. A schedule of accommodation and a long term management and maintenance structures plan (life cycle report), in accordance with section 6 of the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities 2018.
5. In the context of the information required above, a detailed photomontage report which includes the detailing of the finishes of the proposed structures and additional photomontages from strategic viewpoints.
6. A site layout plan indicating what areas are to be taken in charge by the planning authority.
7. Assessment of potential impacts on residential amenities due to noise from the M1, along with related mitigation measures if necessary.
8. A phasing plan for the proposed development which includes the phasing arrangements for the delivery of the public open spaces, surface water management proposals and Part V provision.

9. Where the applicant considers that the proposed strategic housing development would materially contravene the relevant development plan or local area plan, other than in relation to the zoning of the land, a statement indicating the plan objective (s) concerned and why permission should, nonetheless, be granted for the proposed development, having regard to a consideration specified in section 37(2)(b) of the Planning and Development Act 2000. Notices published pursuant to Section 8(1)(a) of the Act of 2016 and Article 292 (1) of the Regulations of 2017, shall refer to any such statement in the prescribed format.

10. The information referred to in article 299B (1)(b)(ii)(II) and article 299B(1)(c) of the Planning and Development Regulations 2001-2018 should be submitted as a standalone document.

8.1.1. Also, pursuant to article 285(5)(a) of the Planning and Development (Strategic Housing Development) Regulations 2017, the prospective applicant is informed that the following authorities should be notified in the event of the making of an application arising from this notification in accordance with section 8(1)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016:

1. Irish Water
2. Transport Infrastructure Ireland
3. National Transport Authority
4. Department of Culture, Heritage and the Gaeltacht
5. An Taisce-the National Trust for Ireland
6. The Heritage Council
7. Failte Ireland
8. An Comhairle Ealaíonn
9. Louth County Childcare Committee
10. Meath County Childcare Committees
11. Meath County Council

PLEASE NOTE:

Under section 6(9) of the Planning and Development (Housing) and Residential Tenancies Act 2016, neither the holding of a consultation under section 6, nor the forming of an opinion under that section, shall prejudice the performance by the Board, or the planning authority or authorities in whose area the proposed strategic housing development would be situated, of any other of their respective functions under the Planning and Development Acts 2000 to 2016 or any other enactment and cannot be relied upon in the formal planning process or in legal proceedings.

Stephen Rhys Thomas
Senior Planning Inspector

26 June 2020