



An  
Bord  
Pleanála

## Inspector's Report ABP 308041-20

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<b>Development</b>	Construction of 41. no housing units and associated works.
<b>Location</b>	Townland Charlesland, Greystones, Co. Wicklow.
<b>Planning Authority</b>	Wicklow County Council
<b>Type of Application</b>	AA Screening Determination
<b>Applicants</b>	Cllr Mags Crean
<b>Date of Site Inspection</b>	30 <sup>th</sup> September, 2020.
<b>Inspector</b>	Sarah Lynch

## 1.0 Introduction

- 1.1. Wicklow County Council is proposing to develop a residential scheme on lands to the south of Burnaby residential estate in the townland of Charlesland. Under the provisions of Article 250 (3)(b) Cllr Mags Crean is seeking a determination from An Bord Pleanala, as to whether the development would be likely to have such significant effect to require that an Appropriate Assessment of the proposed development should be carried out.
- 1.2. Wicklow County Council have carried out an Appropriate Assessment Screening for the proposed development in which it is determined that an Appropriate Assessment is not required and has initiated the process set out in Part XI of the Planning and Development Act 2000, as amended and Part 8 of the Planning and Development Regulations, 2001, as amended.
- 1.3. There is a concurrent request for the Board to make a screening determination under Article 120 (3)(b) of the Planning and Development Regulations 2001, as amended, as to whether the development application would be likely to have significant effects on the environment requiring EIA (ABP 308042-20).

## 2.0 Site Location and Description

- 2.1. The site is located in the townland of Charlesland to the south of Greystones Golf Club. The site is bounded by the Burnaby residential development to the north and the Charlesland residential development to the south. The Three Trout Stream flows along the northern boundary of the site and enters the Irish Sea to the east.
- 2.2. The site is currently undeveloped and is surrounded by trees on all sides. The site has relatively easy accessibility to the N11 via the R774 to the south of Greystones.
- 2.3. The area is predominantly residential in character comprised of detached/semi detached and terrace dwellings of suburban design and layout. The site is located close to local services/shops and is well served by community facilities.

### **3.0 Proposed Development**

3.1. The proposed development comprises 41 dwellings which will comprise the following:

- 16 no. 1 bedroom apartments (2 storey)
- 4 no. 2 bedroom apartments (2 storey)
- 14 no. 2 bedroom houses (2 storey)
- 7 no. 3 bedroom houses (2 storey)

3.2. The site will provide for 51 car parking spaces and will be accessed from the existing Burnaby Court development to the north and would be connected to the public water and foul services adjacent to the site.

### **4.0 Request for Direction and Submitted Documents**

4.1. A request was submitted by Cllr Mags Crean seeking a determination by the Board as to whether an Appropriate Assessment would be required for the proposed development. The following summarises the content of these submissions.

4.2. In an email received by the Board on July 19<sup>th</sup>, 2020, Cllr Mags Crean, raised concerns regarding the authenticity of Wicklow County Council's screening process. She noted that the Three Trouts Stream is identified within the Wicklow County Council Local Development Plan as a salmonid fishery that contains migrating sea trout and eels and supports grey heron, dippers and other protected species under Annex II.

4.3. It is stated within the email submitted, that the Three Trout Stream flows for 4km within the Greystones/Delgany area and forms one of the most important wildlife corridors /refuges from the Glen of the Downs SAC to the sea and is recognised as important for the migration of sea trout to the point where it reaches the N11. The importance of maintaining a corridor for the migration of eels is also referred to. It is also contended by Cllr Mags Crean that the Three Trout Stream is also a corridor rich in insect life, damselflies, butterflies, and birds. It is further stated that deer and pheasant have also been seen in the area.

4.4. In response to correspondence from the Board dated 28<sup>th</sup> August, 2020, Wicklow Country Council confirmed that the development would be subject to the process set

out at Part XI of the Planning and Development Act, 2000, as amended and Part 8 of the Planning and Development Regulations, 2001, as amended. The submission which was received by the Board on 9<sup>th</sup> September, 2020 included the following documents:

- EIA Preliminary examination
- Appropriate Assessment Screening
- Ecological Impact Assessment
- Location Map
- Site Plan
- Site Sections
- Site Layout
- Architectural Drawings

## 5.0 Policy Context

### **Wicklow County Development Plan 2016-2022**

- 5.1. Under the provisions of the Wicklow County Development Plan 2016-2022, Greystones is designated a Level 3 Large Growth Town II within the Metropolitan Area. Greystones is a strong growth town, served by high quality transport links to surrounding towns and Dublin area. The town is located on the DART/rail line and has good quality bus links and has easy access onto the M/N11 road.

### **Greystone-Delgany & Kilcoole Local Area Plan 2013-2019**

The site is zoned R17 for residential development – development of residential development at a density of 17 units per hectare.

## 6.0 Planning History

- 6.1. There is no recently recorded history on this site, the current Part 8 application is registered under ref 20647.

## 6.2. Natural Heritage Designations

There are no Natura 2000 sites within the development site. The closest site is the Glen of Downs SAC which is located c. 2.2km upstream of the proposed development site. The Murrough Wetlands SAC and Murrough SPA are located c.2.2 & 3.2km south east of the site and the Bray Head SAC is located c. 3.2km to the north east of the site.

## 7.0 Legislation and Guidelines

- 7.1. Under the provisions of article 250(3)(b) of the Planning and Development Regulations 2001, as amended, where any person considers that a development proposed to be carried out by a local authority would be likely to have a significant effect on a European site, he or she may apply to the Board for a determination as to whether the development would be likely to have such significant effect. Where the Board determines that a development would be likely to have a significant effect on a European site it would require the local authority to prepare a Natura Impact Statement.
- 7.2. The guidance contained in 'Appropriate Assessment for Plans and Projects in Ireland -Guidelines for Planning Authorities' (DoEHLG 2009) advises that all plans and projects not directly connected to, or, for the management of a Natura 2000 site must be assessed for its potential significant effects on that site before any decision is made to allow that plan or project to proceed. Each plan or project must also be assessed for its possible in combination effects with other plans or projects. This process is designated 'appropriate assessment' and arises from obligations under Article 6(3) and 6(4) of the Habitats Directive.

## 8.0 Assessment

- 8.1. The proposal is to develop a scheme of 41 dwellings and associated site works and services at Charlesland, Greystones. Co Wicklow. The proposal will require the clearing of the site (1.39ha) of vegetation and the construction of 41 dwellings. Drainage from the site will be into the existing public network, foul waste from the development will discharge into the Greystones Wastewater Treatment System in

which there is capacity to cater for the additional loadings arising from the development. I note in this regard, that Wicklow County Council states within their submission, that 15,063PE is currently available within the Greystones WWTP. This confirmed in the annual environmental report for Greystones WWTP 2017, contained within the EPA website. A clear span bridge will also be constructed at the access to the development from Burnaby estate to the north of the site.

### **Appropriate Assessment Screening**

- 8.2. An Appropriate Assessment Screening document was prepared by Moore Group – Environmental Services on behalf of Wicklow County Council. The Screening document by Moore Group – Environmental Services describes the proposed development, its receiving environment and relevant European Sites in the zone of influence of the development.
- 8.3. A desktop and field survey were conducted to establish baseline conditions on the site. The habitats which were recorded during the site visit and classified (Fossit, 2000), were rated of low to moderate ecological value. The site was categorised into three main habitat types:
  - a) Improved Grassland
  - b) Scrub
  - c) Mixed broadleaf woodland and scrub
- 8.4. No habitats listed as qualifying habitats for the SAC or corresponding with Annex 1 were identified. No high-risk invasive species were recorded.
- 8.5. A mammal survey was also undertaken and no protected mammals (otter, badger, bats) or signs of protected mammals were recorded. The bird species recorded within the site are listed in Table 2 of the Ecological Impact Report and are common in the Irish landscape. None of the bird species that occur on the site are qualifying interests of Murrrough SPA.
- 8.6. The project is not directly connected with or necessary to the management of a European Site and therefore it needs to be determined if the development is likely to have significant effects on any European sites. The nearest site is the Glen of Downs SAC which is located c. 2.2km upstream of the proposed development site.

- 8.7. The AA Screening Report submitted by the Council considers Natura 2000 sites within a 15km radius of the proposed development. The report identifies 3 sites which have the potential to be impacted through a source-pathway receptor link. These sites are, The Glen of the Downs SAC (site code 000719), Bray Head SAC (site code 000714), The Murrough Wetlands SAC (site code 002249).
- 8.8. Table 1 below includes a list of all sites I have considered in the screening of the proposed development, all of which were also considered by the applicant within the Appropriate Assessment Screening document submitted to the Board.
- 8.9. Thus, having regard to the information and submissions available, nature, size and location of the proposed development and its likely direct, indirect and cumulative effects, the source pathway receptor principle and sensitivities of the ecological receptors, the following European Sites are considered relevant to include for the purposes of initial screening for the requirement for Stage 2 appropriate assessment on the basis of likely significant effects.

**Table 1. European sites considered for Stage 1 screening**

<b>European Site Name &amp; Code</b>	<b>Distance</b>	<b>Qualifying Interest</b>	<b>Source-pathway-receptor</b>	<b>Considered further in screening</b>
The Glen of the Downs SAC (site code: 000719)	2.2km upstream	Old sessile oak woods with Ilex and Blechnum in the British Isles [91A0]	Connected via The Three Trout Stream	<b>No</b> This site is upstream of the proposed development and therefore no pathway exists.
Bray Head SAC (site code: 000714)	3.1km north east of site	Vegetated sea cliffs of the Atlantic and Baltic coasts [1230]  European dry heaths [4030]	Hydrological link from The Three Trout Stream to Irish Sea	<b>No</b> No potential for meaningful biological or relevant hydrological connectivity to this site as it is connected via the Irish Sea

Murrrough Wetland SAC (site code: 002249)	2.2km south west of the site	Annual vegetation of drift lines [1210] Perennial vegetation of stony banks [1220] Atlantic salt meadows (Glauco-Puccinellietalia maritima) [1330] Mediterranean salt meadows (Juncetalia maritimi) [1410] Calcareous fens with Cladium mariscus and species of the Caricion davallianae [7210] Alkaline fens [7230]	Hydrological link from The Three Trout Stream to Irish Sea	<b>No</b> No potential for meaningful biological or relevant hydrological connectivity to this site as it is connected via the Irish Sea
The Murrrough SPA (Site code:004186)	3.2km south west of the site	Red-throated Diver (Gavia stellata) [A001] Greylag Goose (Anser anser) [A043] Light-bellied Brent Goose (Branta bernicla hrota) [A046] Wigeon (Anas penelope) [A050] Teal (Anas crecca) [A052] Black-headed Gull (Chroicocephalus ridibundus) [A179] Herring Gull (Larus argentatus) [A184] Little Tern (Sterna albifrons) [A195] Wetland and Waterbirds [A999]	Hydrological link from The Three Trout Stream to Irish Sea	<b>No</b> No potential for meaningful biological or relevant hydrological connectivity to this site as it is connected via the Irish Sea
Carrigower Bog SAC (site code:000716)	6.45km south east of the development	Transition mires and quaking bogs [7140]	No direct pathway to site	<b>No</b>
Ballyman Glen SAC (site code:000713)	10km north east of the site	Petrifying springs with tufa formation (Cratoneurion) [7220] Alkaline fens [7230]	No direct pathway to site	<b>No</b>



<p>Wicklow Mountain SAC (site code:002122)</p>	<p>9.33km east of the development</p>	<p>Oligotrophic waters containing very few minerals of sandy plains (Littorelletalia uniflorae) [3110]</p> <p>Natural dystrophic lakes and ponds [3160]</p> <p>Northern Atlantic wet heaths with Erica tetralix [4010]</p> <p>European dry heaths [4030]</p> <p>Alpine and Boreal heaths [4060]</p> <p>Calaminarian grasslands of the Violetalia calaminariae [6130]</p> <p>Species-rich Nardus grasslands, on siliceous substrates in mountain areas (and submountain areas, in Continental Europe) [6230]</p> <p>Blanket bogs (* if active bog) [7130]</p> <p>Siliceous scree of the montane to snow levels (Androsacetalia alpinae and Galeopsietalia ladani) [8110]</p> <p>Calcareous rocky slopes with chasmophytic vegetation [8210]</p> <p>Siliceous rocky slopes with chasmophytic vegetation [8220]</p> <p>Old sessile oak woods with Ilex and Blechnum in the British Isles [91A0]</p> <p>Lutra lutra (Otter) [1355]</p>	<p>No direct pathway to site</p>	<p><b>No</b></p>
<p>Wicklow Mountains SPA (Site code:004040)</p>	<p>9.5km east of the site</p>	<p>Merlin (Falco columbarius) [A098]</p> <p>Peregrine (Falco peregrinus) [A103]</p>	<p>No direct pathway to site</p>	<p><b>No</b></p>

Knocksink Wood SAC (site code: 000725)	10km north east of the site	Petrifying springs with tufa formation (Cratoneurion) [7220]  Old sessile oak woods with Ilex and Blechnum in the British Isles [91A0]  Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae) [91E0]	No direct pathway to site	<b>No</b>
Rockabill to Dalkey Island SAC (site code:003000)	13km north of the site	Reefs [1170]  Phocoena phocoena (Harbour Porpoise) [1351]	Hydrological link from The Three Trout Stream to Irish Sea	<b>No</b>  No potential for meaningful biological or relevant hydrological connectivity to this site as it is connected via the Irish Sea

### Potential Impacts on European Sites and test of Likely significant effects

- 8.10. The Appropriate Assessment Screening document submitted screens out all of the aforementioned sites on the grounds that they are removed from the development and in most instances, there is no physical link to the proposed development site.
- 8.11. I consider this approach to be reasonable. As mentioned above Wicklow County Council considered three of the sites listed above to have a source-pathway-receptor link to the site and examined these sites in more detail to establish whether there was a potential for impacts to arise. I consider that this approach was reasonable but consider it necessary to also examine the potential for impacts in relation to the Murrough SPA (site code 004186).
- 8.12. The following is a detailed examination of the potential for the development to give rise to significant effects on the Glen of the Downs SAC, Bray Head SAC, Murrough Wetlands SAC and Murrough SPA.
- 8.13. The Glen of the Downs SAC, is located c. 2.2km upstream to the east of the site. The site is a semi-natural oak wood situated within an impressive glacial overflow channel. Although exploited heavily in the past, this woodland is well developed, rich in species

and is of high conservation significance. The site supports oak woodland of a type that is listed on Annex II of the E.U. Habitats Directive. The glacial overflow channel is the largest example of such a feature in the country.

- 8.14. The conservation objectives for this site seeks to maintain or restore the favourable conservation condition of the Annex I habitat(s) and/or the Annex II species for which the SAC has been selected. The site is upstream of the proposed development and therefore impacts arising from the proposed development are not considered to be likely.
- 8.15. Bray Head SAC is a coastal site situated in the north-east of Co. Wicklow between the towns of Bray and Greystones. Bray Head consists of a plateau of high ground, with five prominent quartzite knolls and has a maximum height of 241 m. The more exposed higher ground has a covering of shallow acidic soils, with protruding bedrock and scree. Elsewhere, deeper soils are formed by drift deposits and are calcareous in character.
- 8.16. Dry heath is the principal habitat over much of Bray Head. The vegetation of the upper plateau area is dominated by dwarf shrubs, mainly Heather (*Calluna vulgaris*), Bell Heather (*Erica cinerea*) and gorse (*Ulex europaeus* and *U. gallii*). Broom (*Cytisus scoparius*) also occurs, and associated with the gorse and broom is the Red Data Book species Greater Broomrape (*Orobanche rapum-genistae*). In the areas where the shrubs are less dense Tormentil (*Potentilla erecta*), Common Milkwort (*Polygala vulgaris*), Heath Bedstraw (*Galium saxatile*) and a variety of grasses (e.g. *Aira praecox*, *Agrostis tenuis*, *Deschampsia flexuosa*) are present. Where rock outcrops occur species such as English Stonecrop (*Sedum anglicum*) and Sheep's-bit (*Jasione montana*) are found. Bracken (*Pteridium aquilinum*) is dominant in some areas.
- 8.17. A site-specific conservation objective aims to define favourable conservation condition for a particular habitat or species at that site. The site synopsis states that the heath and grassland habitats at this site are threatened by reclamation for agriculture and also by frequent burning.
- 8.18. Given the location of the qualifying interests of this site on high lands and cliffs and having regard to the dilution and distribution action of the sea the likelihood of potential impacts does not arise.

- 8.19. The Murrough Wetlands SAC, is a coastal wetland complex which stretches for 15 km from Ballygannon to north of Wicklow town, and in parts, extends inland for up to 1 km. A shingle ridge stretches the length of the site and carries the mainline DublinWexford railway. On the seaward side of the shingle bank which runs along The Murrough Wetlands SAC site drift line vegetation includes species such as Sea Rocket (*Cakile maritima*), Sea Sandwort (*Honkenya peploides*), Sea-holly (*Eryngium maritimum*) and Yellow Horned-poppy (*Glaucium flavum*).
- 8.20. The conservation objectives for this site seeks to maintain or restore the favourable conservation condition of the Annex I habitat(s) and/or the Annex II species for which the SAC has been selected.
- 8.21. The site synopsis states that recent farming and drainage practices and afforestation have greatly reduced the area and quality of the wetlands habitats and the site is sensitive to further pollution, reclamation and further drainage.
- 8.22. Having regard to the location of this European site and to the dilution and distribution action of the sea I consider that impacts are unlikely.
- 8.23. The Murrough SPA is a coastal wetland complex that stretches for 13 km from Kilcoole Station, east of Kilcoole village in the north to Wicklow town in the south, and extends inland for up to 1 km in places. The site includes an area of marine water to a distance of 200m from the low water mark. A shingle ridge runs along the length of the site and carries the Dublin-Wexford railway line.
- 8.24. The Murrough SPA is an important site for wintering waterbirds, being internationally important for Light-bellied Brent Goose and nationally important for Red-throated Diver, Greylag Goose, Wigeon, Teal, Black-headed Gull and Herring Gull. It is probably the most important site in the country for nesting Little Tern.
- 8.25. A site-specific conservation objective seeks to maintain or restore the favourable conservation condition of the bird species listed as Special Conservation Interests for this SPA.
- 8.26. The proposed development site is not used by the qualifying interests of this site and as such I consider impacts to be unlikely.
- 8.27. Notwithstanding the foregoing it is necessary to consider in detail, the potential for impacts to arise in relation to both the construction and operation phases of the

proposed development. The submitted AA Screening document considers the potential for such impacts and states that impacts arising from the development relate to the deterioration of Water quality.

- 8.28. Construction activity will take place entirely within the boundaries of the site, which removes the potential for any direct impacts on the SACs or the SPA during the construction or operational stages of the development. There will be no loss of habitat within these Natura 2000 sites and the habitats within the development site do not correspond to habitats listed on Annex 1 of the Habitats Directive, or to the qualifying habitats for the SACs or SPA.
- 8.29. While the site may be used as feeding/foraging habitat for birds which are common in the Irish landscape, there will be no loss of any ex-situ foraging or roosting site for species of conservation interest. There is potential for noise/disturbance to birds and mammals that may be present on the site. However, the site survey suggests that the site is not used by birds which are qualifying interests of the SPA.
- 8.30. The bird species for which the SPA is selected are largely coastal, wetland and waterbirds and would not generally favour inland habitats, particularly in a busy urban setting. No protected mammals were recorded on the site.
- 8.31. The Board will note that Cllr Mags Crean takes issue with the impact of the development on the ecological corridor from The Glen of the Downs SAC to the sea. It is important to note in this context that there are no instream works proposed, the bridge proposed will comprise of a clear span and will not encroach into the stream. A significant riparian strip will also be provided along the full boundary of the stream. Open space is also proposed adjacent to this riparian strip resulting in a significant separation distance from the proposed housing units and the stream. As bats are not a qualifying interest of any of the proximate SACs or SPA this is a matter for consideration by the Board under the provisions of Article 250. However, it is of note that bats were not encountered during surveys.
- 8.32. The presence of the Three Trout Stream along the northern boundary of the site is the only hydrological connection to the Irish Sea and consequently the aforementioned SACs and SPA. As mentioned, no instream works are proposed and given the separation of the proposed works from these SACs and SPA and the dilution and

dispersion action of the sea I consider that the potential for impacts to arise from the construction phase of the development is unlikely.

- 8.33. During the operational stage of the development there is a potential for indirect effects on the SACs/SPA arising from surface water and wastewater discharges. I note that storm water will be dealt with in accordance with the Wicklow policy on storm water, the Greater Dublin Regional Code of Practice for Drainage Works and best practice for Sustainable Urban Drainage Systems.
- 8.34. Wastewater from the development will be directed to the Greystones Wastewater Treatment Plant which has a remaining capacity of 15,063PE. I draw the attention of the Board to the Annual Environmental Report for Greystone WWTP 2017 in which it is stated that final effluent from the Primary Discharge Point was compliant with the Emission Limit Values in 2017 and the discharge from the wastewater treatment plant does not have an observable negative impact on the water quality. I note that similar conclusions are reached in the more recent 2019 AER.
- 8.35. The proposed development will increase the loadings on this WWTP by a negligible amount, circa 123PE.
- 8.36. Having regard to the foregoing I am satisfied that there is no likelihood that pollutants arising from the proposed development either during construction or operation could reach the designated sites in such concentrations to have any likely significant effects on them, in view of their qualifying interests and conservation objectives.

### **Cumulative Effects**

- 8.37. In-combination effects are considered within Section 5.2 of the report submitted. The development site is surrounded by established residential development. To the west of the site lands are zoned and currently undeveloped to cater for a low density residential development of up to 22 units per hectare. An Action Plan has been prepared for these lands which will contain a new link road, open space and residential units. The lands to the north of this Action Plan Area are identified to accommodate a greenway which will also pass through the subject site along The Three Trout Stream.
- 8.38. As mentioned above the applicant proposes to provide a clear span crossing over the Three Trout Stream and states that no in stream works are proposed. This is important in the context of considering cumulative impacts on water quality.

- 8.39. It is of note that the area is significantly urbanised with wastewater from other developments also discharging to the Irish Sea.
- 8.40. The population growth of Greystones is catered for through land use planning, including the Wicklow County Development Plan. This has been subject to AA by the planning authority, which concluded that its implementation would not result in significant adverse effects on the integrity of any Natura 2000 sites. The town's wastewater treatment plant has adequate capacity to serve the planned growth of the settlement as set out in the population targets of the Core Strategy.
- 8.41. The proposal is for a small residential development on zoned lands within the urban area. While the development will add marginally to the loadings to the WWTP, it is not considered that there would be any measurable impact on water quality or significant negative effects on Natura 2000 sites or their qualifying interests.

### **Conclusion on AA Screening**

- 8.42. The only pathway for potential impacts on Natura 2000 sites is via the discharge of wastewater to the WWTP. Having regard to the nature and limited scale of the proposed development on serviced lands, the nature of the receiving environment which comprises a built up urban area, the distance to the nearest European sites, and the insignificant additional loading to the wastewater treatment plant, which is operating without any significant impact on water quality, I consider that it is reasonable to conclude, on the basis of the information on the file, which I consider adequate in order to issue a screening determination, that the proposed development, either individually or in combination with other plans or projects would not be likely to have a significant effect on The Glen of the Downs SAC (site code 000719), Bray Head SAC (site code 000714), The Murrough Wetlands SAC (site code 002249) and Murrough SPA (site code 004186), in view of the conservation objectives of these sites and that a Stage 2 Appropriate Assessment and the submission of a Natura Impact Statement for the proposed development is not, therefore, required.

## **9.0 Recommendation**

I recommend that the local authority be directed not to prepare a Natura Impact Statement in respect of the said development for the reasons and considerations set out below.

## **Reasons and Considerations**

Having regard to:

- (a) The nature and limited scale of the proposed development,
- (b) The separation distance between the proposed development and European sites,
- (d) the identified capacity in the Greystones Waste Water Treatment Plant to cater for the discharges associated with the development,
- (e) the submission made on behalf of the local authority, including the Appropriate Assessment Screening Report dated 22<sup>nd</sup> August 2019.
- (f) the report and recommendation of the person appointed by the Board to make a report and recommendation on the matter,

It is considered reasonable to conclude that on the basis of the information available, which is considered adequate to issue a screening determination, that the proposed development, either individually and in combination with other plans or projects, would not be likely to have a significant effect on The Glen of the Downs SAC (site code 000719), Bray Head SAC (site code 000714), The Murrough Wetlands SAC (site code 002249) and Murrough SPA (site code 004186), in view of the conservation objectives of these sites and that a Stage 2 Appropriate Assessment and the submission of a Natura Impact Statement for the proposed development is not, therefore, required.

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Sarah Lynch  
Senior Planning Inspector

6<sup>th</sup> October 2020.