



An
Bord
Pleanála

Inspector's Report ABP-310736-21

Development	Demolition of two warehouses and construction of 39 dwelling units
Location	The Boatyard, Church Road, Carrigaline Middle, Carrigaline, County Cork
Planning Authority	Cork County Council
Planning Authority Reg. Ref.	20/5947
Applicant(s)	Glenveagh Homes Ltd.
Type of Application	Permission
Planning Authority Decision	Grant
Type of Appeal	Third Party
Appellant(s)	Jim & Jo Collins
Observer(s)	Vincent Barrett
Date of Site Inspection	21 st September, 2021
Inspector	Kevin Moore

1.0 Site Location and Description

1.1. The 1.37 hectare site is located on the eastern side of Carrigaline in County Cork. It is accessed from Church Road via a minor local road serving three houses, a pumping station, and the site. There are two boat warehouses on the site which are falling into a state of disrepair. There are mature hedgerows forming the northern and western boundaries and the Owenboy River estuary (part of Cork Harbour Special Protection Area) is to the south and south-east. There is residential estate development to the west and north-west.

2.0 Proposed Development

- 2.1. The proposed development would comprise the demolition of the two warehouses and the construction of 35 two-storey, terraced townhouses, and a three-storey apartment block containing four apartments. The houses would consist of a mix of two and three bedroom units and there would be 2 no. two bedroom two-storey units over 2 no. one bedroom apartments in the apartment block. It also includes the realignment and widening of the existing access road, the provision of a new footpath along its western side and visibility improvements at the junction with Church Road.
- 2.2. Details submitted with the application included a Planning and Design Statement, a Part V Costs & Methodology Pro-forma, a letter of consent from Cork County Council relating to proposed modifications at the junction with Church Road, a Housing Quality Assessment, a Design Statement, a Landscape Masterplan and Landscape Design Report, Photomontages, an Infrastructure Report, a Flood Risk Assessment, Confirmation of Feasibility from Irish Water, a Traffic and Transport Assessment, a Preliminary Construction Management Plan, an Ecological Impact Assessment, an Appropriate Assessment Screening / Natura Impact Statement, and a Public Lighting Report.

3.0 Planning Authority Decision

3.1. Decision

On 8th June 2021, Cork County Council decided to grant permission for the proposed development subject to 61 conditions.

3.2. Planning Authority Reports

3.2.1. Planning Reports

The Planner noted the site is zoned for residential use, the density is within the range provided for with the development plan, and considered the unit mix, visual impact, and open space provision to be acceptable. It was submitted that clarity was required on boundary arrangements and the Area Engineer's concerns on parking were acknowledged. Clarity was also seen to be required on drainage. The requests for further information set out in the other reports to the planning authority were also noted. A request for further information was recommended.

The Senior Planner considered the proposal to be acceptable in principle. He concurred with the Planner's recommendation to seek further information.

3.2.2. Other Technical Reports

The Housing Officer was satisfied that the proposed designated three units would be suitable for social housing purposes.

The Public Lighting Report sought further information on lighting.

The Environment Section sought further information on how the watercourse on the site is to be integrated into the landscape plan and habitat improvement works.

The Estates Section sought clarity on the fencing of the eastern and southern boundaries of the site.

The Area Engineer considered there was a need for increased parking provision and a reduction in density, and the provision of an autotrack analysis. Concerns were raised about footpath provision and the location of the play area. Flood mitigation measures and surface water proposals were considered acceptable.

A second Environment Report requested further information in the form of a demolition waste management plan, a construction and waste management plan, and a surface water runoff management plan.

The Ecologist requested a revised construction and environmental management plan, measures to control access to the shoreline, and clarification on lighting impacts on the shoreline.

3.3. Prescribed Bodies

Inland Fisheries Ireland requested that Irish Water signify that there is sufficient capacity in the treatment system such that it is not overloaded and the development would not result in polluting matter entering waters.

Irish Water had no objection to the proposal.

The Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media requested screening be provided between the site and the estuary, noted the potential impact of light spill, requested more details on bird usage and habitat impact, and sought ongoing maintenance for the proposed hydrocarbon interceptor. This submission was received after the issuing of a request for further information.

3.4. Third Party Observations

There were submissions received from Vincent Barrett, Joe and Marian Hughes, and Estuary Residents Association and Church Road Residents raising concerns which include those relating to density, access, flood risk, traffic impact, maintenance, services impact, poor quality development, adequacy of surveying, impact on avifauna, and legal interest.

A submission was also received from Jim and Jo Collins. The grounds of appeal reflect the principal planning concerns raised.

- 3.5. A request for further information was sought on 30th October 2020 and a response to the request was received on 22nd December 2020. This included revised proposals that reduced the scheme by one dwelling unit at the north-western corner of the site, revised parking provisions, and landscaping revisions. Revised plans were also submitted in accordance with the request. The response also addressed the submission from the Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media.
- 3.6. The reports to the planning authority following the receipt of the further information were as follows:
- The Public Lighting Section had no objection to the proposal subject to a schedule of conditions.
 - The Housing Officer was satisfied that the proposed designated three units would be suitable for social housing purposes.
 - The Estates Section had no objection to the proposal subject to a schedule of conditions.
 - The Engineering Section had no objection to the proposal subject to a schedule of conditions.
 - The Environment Section had no objection to the proposal subject to a schedule of conditions.
 - The Ecologist was satisfied with lighting proposals and control of access to the shoreline and requested further updates and revisions to the CEMP.
 - The Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media noted data from bird surveys were outstanding.
 - The Planner recommended clarification in accordance with the Ecologist's request on the CEMP.
 - The Senior Planner concurred with the Planner's recommendation and also requested that clarification be sought on the proposed surface water strategy.
- 3.7. A request for clarification was sought by the planning authority on 23rd February 2021 and a response to this request was received on 16th April 2021. This included a

wintering bird survey report, a preliminary construction management plan, drainage details and supporting drawings.

3.8. The reports to the planning authority were then as follows:

- The Public Lighting Section had no objection to the proposal subject to a schedule of conditions.
- The Ecologist was satisfied with the clarification submission. A Habitats Directive Assessment was set out, which concluded that the proposal, by itself or in combination with other plans and projects, would not adversely affect the integrity of Cork Harbour SPA or any other Natura 2000 site. There was no objection to the proposal subject to a schedule of conditions.
- The Planner noted the clarification submission, considered it adequate and recommended that permission be granted subject to a schedule of conditions.
- The Senior Planner considered the proposal to be in accordance with the objectives of the County Development Plan and represented proper planning and sustainable development. A grant of permission was recommended subject to a schedule of conditions.

4.0 Planning History

ABP-300038-17 (P.A. Ref. 16/6621)

Permission was granted by the Board for the demolition of two warehouses and the construction of 19 dwellings, the provision of a pedestrian walkway, the provision of footpaths, and changes to access arrangements to Church Road.

P.A. Ref. 98/2642

Permission was granted for a commercial garage.

ABP Ref. PL 04.097238 (P.A. Ref. 95/2693)

Permission for five houses was refused by the Board.

ABP Ref. PL 04.090373 (P.A. Ref. 92/2133)

Permission was granted for a commercial garage by the Board.

5.0 Policy Context

5.1. Ballincollig Carrigaline Municipal District Local Area Plan

Carrigaline is designated a 'Main Town' in the LAP. The strategic aim for Carrigaline is to consolidate the rapid growth of recent years within the town's development boundary.

The site lies within the designated settlement boundary of the town on lands defined as 'Existing Built Up Area'.

There is a specific Development Objective which applies to this site as follows:

Objective CL-R-04

Medium A density residential development.

The LAP notes that Objective HOU 4-1 of the Cork County Development Plan sets out the housing density standards. This objective in the County Development Plan refers to Medium A Density residential development as being between 20 and 50 units per hectare.

5.2. EIA Screening

Having regard to:

- the nature, limited scale and location of the proposed development,
- the fully serviced nature of the development,
- its location within an urban settlement adjoining established residential development,
- the site comprising lands on which residential development was previously permitted and for which there is an outstanding planning permission for residential development,
- to the site being subject to a specific development objective in the Ballincollig Carrigaline Municipal District Local Area Plan to provide for medium density housing thereon, and

- to the conclusions of the appropriate assessment set out in my assessment below,

it is considered that there is no real likelihood of significant effects on the environment.

The submission of an EIAR is not required.

6.0 The Appeal

6.1. Grounds of Appeal

The appellants reside immediately to the north of the site. The grounds of the appeal may be synthesised as follows:

- The site is within a flood zone within a wider floodplain and would be vulnerable to flooding. It would be contrary to Government guidelines and actions proposed to combat vulnerability, including raising of the land, are inadequate and would directly lead to harmful ponding and/or flooding at adjacent properties, including the appellants' adjoining property.
- The proposal would have serious negative implications for a National Heritage Area, Cork Harbour SPA, and a designated Scenic Landscape. A significant negative impact on important wildlife habitats and populations seems highly likely.
- Work on the road, fencing or construction activities should be required to conserve and protect underground services on the road. A footpath on the western side would affect access to pipework and would create a danger for traffic accessing the adjoining three properties. A footpath on the east side would be safer.
- A development of the size proposed would exacerbate existing congestion and traffic hazards on the extremely busy Church Road, and where the junction of the Boatyard access road with it is at a semi-blind bend.

6.2. Applicant Response

The applicant's response to the appeal may be synthesised as follows:

Flood Risk

- The site has a small area along the estuary identified as being in Flood Risk Zone A and B. They are not part of the developable area of the site and will be part of a larger area of public open space.
- A comprehensive Flood Risk Assessment was submitted with the application. The locations of the proposed houses and the access road are not at risk of flooding and the scheme is designed to mitigate against any potential risk of flooding and to ensure there is no risk of increased flooding of adjoining property. A number of flood resilient measures are designed to limit the impact of flooding. Additional design details were submitted as further information, including rain gardens and SUDS infrastructure. The whole development will drain via a bypass separator.
- There have been no flood events recorded within the development boundary in the OPW flood map website.
- The issues relating to flood risk were assessed as part of the previous Application on the site.

Environment and Ecology

- The site is not within a designated conservation site. The southern boundary adjoins a pNHA and a SPA.
- A NIS was submitted. There is no risk of activities causing direct loss of habitat and measures are proposed to minimise disturbance of the SPA. Surface water management and lighting conditions attached with the planning decision bolster environmental protections.
- The site is a brownfield, infill, serviced site within the suburban area of Carrigaline.
- The application comprehensively addresses all environmental considerations. Measures are proposed to ensure the development protects birds and to

ensure adequate wastewater and surface water drainage is in place to reduce risk of pollutants.

- The findings of the applicant's surveys determined that there is negligible bat roosting potential at the site and bat activity was low. The site does not support suitable roosting habitat.
- Wintering bird surveys concluded that no species were recorded roosting on the embankment. The CEMP provides recommendations in relation to noise and visual disturbance.
- The conditions of the planning decision relating to monitoring and the Habitats Directive assessment undertaken by the planning authority are noted.

Density and Scale

- The previous application permitted on the site reflected the recommended density of the development plan at that time. The current application has regard to Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas.
- The site is now subject to Objective CL-R-04 of the Ballincollig Carrigaline Municipal District LAP, requiring Medium A residential development.
- The proposed development makes more efficient use of the site.
- The proposed ridge levels of the development are consistent with the existing ridge levels of adjoining properties. Also, a comprehensive landscaping plan was designed to screen potential visual impact. The proposed units are sympathetic to the surrounding area. The development is primarily two storeys in height and corresponds to the prevailing character of the surrounding area.

Traffic and Services

- The Traffic and Transport Assessment submitted with the application demonstrates that the proposal will not have any material impact on existing traffic generation.
- The proposal includes significant road and junction improvements.
- The number of units were reduced to comply with parking on site.

- The realigned junction will provide a safe access and will improve visibility.
- The footpath is designed to ensure there will be no issues with crossing from residents residing to the north of the site. It is standard practice that services run under a footpath. It is located on the west side to ensure landscaping could be provided and retained on the eastern side adjoining a watercourse.
- The Council has levied a contribution for the provision of a footpath from the development to Church Road and this is supported. This will enhance pedestrian and cyclist connectivity.

6.3. **Planning Authority Response**

The planning authority submitted that the public lighting is conditioned to be in accordance with the principles outlined in Cork County Council Lighting Manual.

6.4. **Observations**

The observer raises concerns relating to density/form/scale/character of the proposed development, flood risk to adjoining properties, adverse environmental and ecological impacts, inadequate consideration of existing services, and traffic hazard at the junction with the regional road.

7.0 **Assessment**

7.1. **Introduction**

- 7.1.1. I consider that the main planning issues relating to the proposal are the principle of the proposed development, impact on residential amenity, flood risk, traffic impact, impact on public services, and ecological impact.

7.2. **The Principle of the Proposed Development**

- 7.2.1. The site of the proposed development has been subject to a previous permission by the Board under ABP-3000380-17 for the demolition of the existing warehouses and the construction of 19 houses, the provision of footpaths, and changes to access arrangements at Church Road. Thus, the nature of the proposed use and the

infrastructural changes necessary to accommodate this residential use have been accepted previously.

7.2.2. Further to this, there is a specific development objective in the Ballincollig Carrigaline Municipal District Local Area Plan which applies to this site, namely Objective CL-R-04, which seeks Medium A density residential development on the site. Therefore, this objective expressly seeks a density of between 20 and 50 residential units per hectare on this site. The proposal seeks to accommodate 38 residential units on this site which is 1.37 hectares in area. This proposal is clearly well within the requirements of Objective CL-R-04.

7.2.3. It is evident that the principle of the proposed development has been, and is, accepted.

7.3. **Impact on Residential Amenity**

7.3.1. The proposed development is on a site which is well enclosed, screened and distinctly separate from neighbouring residential properties. Due to the proposed layout, form, scale, height, design, separation distances from neighbouring properties, and natural screening, it is clear that the proposed housing scheme would not have any significant adverse impacts on established residential amenities in the area by way of overlooking, overshadowing or overbearing impact. Furthermore, it is noted that the proposal is in keeping with the specific development objective for the site. It also meets with the provisions of Cork County Development Plan as they relate to new residential development in terms of urban design, housing mix, density, etc. Furthermore, it would have no substantive impact on the landscape such that the visual amenity of the area would be undermined in any notable manner.

7.4. **Flood Risk**

7.4.1. In considering this issue, I first note that the site of the proposed development is a brownfield site on which there is established development. This site has been subject to drainage, excavation, site preparation and building construction works

previously. I also note that this site has previously been the subject of permission from the Board for a residential scheme.

- 7.4.2. The applicant submitted a flood risk assessment with the application which has been prepared in accordance with *The Planning System and Flood Risk Management Guidelines for Planning Authorities*. I acknowledge that the flood extents for the Owenboy River and Estuary reach the site's boundary and overlap a small area at the south and south-east end of the site. I further note that there are no recorded historical flood events associated with the site or its immediate environs. I note from the flood risk assessment undertaken by the applicant that the site is at a low to medium risk from tidal and fluvial flooding and at a low risk of pluvial flooding.
- 7.4.3. The layout and provisions for the proposed development are acknowledged. Site levels are proposed to be raised and all of the proposed residential development would be located beyond Flood Zone A. Floor levels are proposed to be located above the 0.1% AEP flood level for the future mid-range scenario, plus there is to be a 350mm freeboard. Any potential surcharging of the drainage system is to be addressed by design provisions and by applying good practice in maintenance and management. I acknowledge the drainage design includes a 10% climate change allowance. The rip-rap embankment that exists at the estuary edge has been determined to be adequate to protect against coastal erosion and it is proposed to be improved with rock armouring where required. I finally note that the small coastal edge lying within the Flood Zone A would be a landscaped area, a use considered suitable at this location.
- 7.4.4. Overall, it is my submission to the Board that the proposed development would not be subject to a significant risk of flooding with the mitigation measures being provided. I further consider that no reasonable conclusion could be drawn which would infer that the proposed development would increase the flood risk for established residential properties that are located further away from the coastal edge. I consider that drainage improvements are likely to improve any ponding or other drainage issues arising at the entrance to the site or along the road serving the site.

7.5. **Traffic Impact**

- 7.5.1. The proposed development would include the realignment and widening of the existing access road from Church Road to the site, the provision of a new footpath along the western side of the local road, and visibility improvements at the junction of Church Road and the local road. The housing scheme would accommodate 38 residential units and there would be on-site provisions to meet occupiers' parking needs.
- 7.5.2. I note the findings of the applicant's traffic and transport assessment. It is apparent that the traffic that would be generated by this relatively small scheme of houses would not culminate in any significant additional generation of traffic onto Church Road. Church Road is a regional road, a principal link between Carrigaline and Ringaskiddy and there are no concerns about its carrying capacity or any potential adverse impacts on its function. I acknowledge that the junction of the local road with this regional road is deficient to be facilitating increased traffic usage, particularly the restricted visibility to the east along the regional road. The proposed improvement works at the junction would clearly alleviate the traffic concerns, increasing visibility in both directions. I further note that this junction is within the speed limit control zone for Carrigaline. I then acknowledge the alignment and footpath provisions. The alignment provisions would ensure that the local road can adequately accommodate two-way vehicular traffic along its length, which would significantly improve on the conditions of the existing road and would improve traffic safety. Finally, I note the proposal to provide a footpath on the west side of the local road as far as the junction with Church Road. The appellants have raised concerns about the siting of this footpath on the west side and have suggested it would be better located on the east side of the road. It is my submission to the Board that the proposed footpath is best located on the west side of the road because when it meets with the junction of Church Road it is only a few metres from the established footpath network to the west which provides pedestrian access on to Carrigaline town centre. There is no footpath east of the junction and the provision along the west side of the local road facilitates easy linkage with the established footpath network. Such a provision eliminates the need for pedestrians crossing the local road at or near the junction

before seeking to access the established footpath network if the footpath was developed along the east side of the local road. The concern about a negative impact of the footpath on the existing residential properties on the west side of the local road is unfounded in my opinion. There would not be significant footfall associated with this relatively small housing scheme and the footpath would be suitably dished at the entrances to each of the three houses along this road. Vehicular and pedestrian access into and out of the established residential properties would not be impeded.

- 7.5.3. Overall, I consider that it is reasonable to determine that the proposed development would not have any significant adverse traffic impact at this location.

7.6. **Impact on Infrastructural Services**

- 7.6.1. I note the appellants and observer concerns relating to impacts on underground services. The laying of services underground (under the road, margin and/or footpath), the provision of improved drainage, and the maintenance of existing underground services should not pose any particular difficulties at the construction and occupancy stage of the proposed development.

7.7. **Ecological Impact**

- 7.7.1. The Board will note the conclusions drawn in the appropriate assessment below. I am satisfied to determine that the proposed development, individually or in combination with other plans or projects, would not adversely affect the integrity of Cork Harbour SPA (Site Code: 004030), or any other European site, in view of the site's Conservation Objectives. The impact of the proposed development on Cork Harbour SPA (and, as a consequence, the proposed Natural Heritage Area) would not be significant on this brownfield, serviced site which has been earmarked in the Local Area Plan for development of this nature and density.
- 7.7.2. I note the applicant's ecological impact assessment, wintering bird surveys, and the findings of the planning authority's Ecology Officer, as well as the measures

proposed by the applicant to address the landscaping of this site and the maintenance, protection and improvements along the western and northern flank boundaries of the site. There is no particular concern that this site, designated for residential development of this nature, would pose significant impacts for flora and fauna at this location. The applicant's range of mitigation measures set out in Section 5 of the ecological impact assessment for the construction and operational phases would seek to protect the ecological features of the site. These measures include a Construction Environmental Management Plan, the appointment of an Environmental Clerk of Works, a detailed drainage system, coastal protection measures, and improved landscaping.

- 7.7.3. I am satisfied to conclude that the proposed residential scheme on this site designated for residential development would not have any significant adverse impacts for the ecology of this location.

7.8. **Screening for Appropriate Assessment**

7.3.1. **Background**

The applicant provided a Screening for Appropriate Assessment as part of the Natura Impact Statement submitted to the planning authority (Appendix A of the NIS). This Stage 1 AA Screening Report was prepared in line with current best practice guidance. It provides a description of the proposed development, identifies European Sites within a possible zone of influence of the development, identifies potential impacts, and assesses the significance of potential impacts. The conclusion of the applicant's AA Screening Report is as follows:

"In the absence of mitigation measures to avoid disturbance to the SCI species of Cork Harbour SPA during the construction and operational phase of the proposed development and measures to control surface water pollution during construction of the proposed development, the potential for likely significant effects to the SCI of Cork Harbour SPA, as a result of a disturbance and reduction in water quality cannot be ruled out.

In view of objective information, best scientific knowledge and the conservation objectives of the European sites, the potential for likely significant effects to Cork Harbour SPA cannot be excluded ...”

Having reviewed the screening document and additional submissions to the planning authority, I am satisfied that the information allows for a complete examination and identification of any potential significant effects of the development, alone or in combination with other plans and projects, on European sites.

7.3.2. Description of Development

The applicant provides a description of the project and the characteristics of the project in Section 3 of the AA Screening Report. In summary, the development comprises the demolition of two warehouses, the construction of 39 houses (reduced to 38 by way of further information), upgrading of the access road, modifications to the access road junction with Church Road, and associated ancillary site development works. Section 3 describes the works proposed, including site access, surface and foul water provisions, and flood prevention measures.

7.3.3. European Sites

I note the applicant has determined that, in view of the source, pathway and receptors of potential impacts and the location, nature, and scale of the proposed development, a 5km radius is considered appropriate to screen all likely significant effects that might impact upon European sites. It was submitted that this was in line with *Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities*. I accept, having regard to the nature, scale and location of the proposed development within the serviced urban settlement of Carrigaline, that this is reasonable. There is one European site within 5km of the site, namely Cork Harbour Special Protection Area (Site Code: 004030) and the site is located immediately adjacent to it, i.e. Owenboy Estuary which forms a part of the SPA.

The qualifying features of conservation interest and conservation objectives for the European site are as follows:

Cork Harbour SPA

Qualifying Features

Little Grebe (*Tachybaptus ruficollis*)
Great Crested Grebe (*Podiceps cristatus*)
Cormorant (*Phalacrocorax carbo*)
Grey Heron (*Ardea cinerea*)
Shelduck (*Tadorna tadorna*)
Wigeon (*Anas penelope*)
Teal (*Anas crecca*)
Pintail (*Anas acuta*)
Shoveler (*Anas clypeata*)
Red-breasted Merganser (*Mergus serrator*)
Oystercatcher (*Haematopus ostralegus*)
Golden Plover (*Pluvialis apricaria*)
Grey Plover (*Pluvialis squatarola*)
Lapwing (*Vanellus vanellus*)
Dunlin (*Calidris alpina*)
Black-tailed Godwit (*Limosa limosa*)
Bar-tailed Godwit (*Limosa lapponica*)
Curlew (*Numenius arquata*)
Redshank (*Tringa totanus*)
Black-headed Gull (*Chroicocephalus ridibundus*)
Common Gull (*Larus canus*)
Lesser Black-backed Gull (*Larus fuscus*)
Common Tern (*Sterna hirundo*)
Wetland and Waterbirds

Conservation Objectives

To maintain the favourable conservation condition of the bird species and the wetland habitat.

7.3.4. Identification of Likely Effects

It is first acknowledged that the proposed development is not connected with or necessary for the conservation management of any Natura 2000 site. It is further acknowledged that the site may reasonably be determined to be in a sensitive ecological location due to its immediate proximity to the SPA. I note that all proposed works are intended to take place outside of the SPA and there would be no direct loss of habitat within the European site.

The range of activities with potential effects on the adjoining European sites would include:

- Vegetation clearance
- Demolition works and site excavation
- Construction of dwellings, services, access roads
- Construction of surface water and foul drainage systems
- Use of fuels, oils chemicals and concrete during the works
- Use of plant, equipment and machinery
- The presence of workers
- Occupation of the new development and associated activities

The potential effects would include:

- Displacement and disturbance of waterbirds arising from the works, including excavation, and presence of workers at the construction phase
- Displacement and disturbance of waterbirds at the operational phase due to the increase in human presence and associated activities
- Water quality impacts to coastal waters arising from surface water drainage and the provision of the rip-rap embankment at the perimeter of the site adjoining the estuary
- Indirect water quality impacts from contaminated sediment and accidental spillage of fuels, oils and chemicals

It is reasonable to determine that the proposed development has the potential to result in disturbance effects due to noise emissions from plant, equipment and machinery, from the presence of workers, from lighting and that there is potential for displacement of birds due to this disturbance. It is also considered reasonable to determine that the nature and extent of the proposed works may potentially impact on the natural marine environment at this location arising from the effects on water quality through the release of pollutants which could negatively affect the species that use the waters as well as the seabed habitats. The operational impacts arise from the changed nature of the land use and the ongoing human presence and associated activities and use of the land.

Having regard to these considerations, it is reasonable to determine that the proposed development could have effects, direct and/or indirect, on the conservation objectives of the adjoining European site.

7.3.5. *In-combination Effects*

In Section 4.2.1 of the AA Screening Report, the applicant identified a range of plans, wastewater and industrial discharges, and some proposed developments that could result in potential cumulative impacts. I note the site of the proposed development is located within the urban area of Carrigaline, the further ongoing development of the town, and the proximity to industrial development in the vicinity and to nearby Ringaskiddy. I am of the view that the proposal would seek to comply with development plan provisions and other public management plans associated with the area and do not consider that there would be any known potential cumulative impacts with such plans. I further note the emission standards to be met associated with treatment of wastewater and industrial discharges and the relatively small scale of the proposed development and do not consider that the proposed development would seek to contribute any significant cumulative impact. Point and diffuse sources of pollution within the harbour, as well as land use and marine activities in the vicinity, are acknowledged also. I know of no significant development proposals in the area with which there would be potential cumulative or in-combination adverse effects on European sites.

I am satisfied to conclude that there would be no known negative in-combination impacts with other plans and projects.

7.3.6. *Mitigation Measures*

No measures designed or intended to avoid or reduce any harmful effects of the proposed alterations on a European site have been relied upon in this screening exercise.

7.3.7. *Screening Determination*

The proposed development has been considered in light of the requirements of Section 177U of the Planning and Development Act 2000 as amended. Having carried out Screening for Appropriate Assessment of the project, it has been concluded that the project individually or in combination with other plans or projects would be likely to give rise to significant effects on Cork Harbour SPA (Site Code: 004030), in view of its Conservation Objectives, and Appropriate Assessment is therefore required.

This determination is based on the following:

- The nature and extent of the proposed works associated with the proposed development,
- The functioning of the residential estate when occupied,
- The proximity to the adjoining European site, and
- The known pathways between the site and the adjoining European site.

7.9. Appropriate Assessment

7.9.1. Background

The proposed development is not directly connected to or necessary for the management of any European site. It is therefore subject to the provisions of Article 6(3) of the EU Habitats Directive. Following the screening process above, it has been determined that appropriate assessment is required as it cannot be excluded

on the basis of objective information that the proposed development individually or in-combination with other plans or projects will have a significant effect on Cork Harbour SPA (Site Code: 004030). The possibility of significant effects on other European sites has been excluded on the basis of objective information. Measures intended to reduce or avoid significant effects were not considered in the screening process.

7.9.2. **Natura Impact Statement**

The applicant submitted a Natura Impact Statement with the planning application to Cork County Council. The NIS addresses methodologies employed, gives a description of the project, identifies the relevant Natura 2000 site and assesses the potential significant effects thereon (inclusive of cumulative effects), and details mitigation. Potential adverse effects of the proposed development on Cork Harbour SPA were examined and assessed. I further note the additional wintering bird survey report, preliminary construction management plan, and drainage details submitted by way of clarification as well as the landscaping and boundary revisions submitted by way of further information. The NIS was prepared in line with current best practice and, together with the additional information submitted, provides an assessment of all potential effects on the SPA arising from the proposed development.

The NIS concluded:

“The conclusion of this NIS is that with the implementation of best practice and the recommended mitigation measures there will be no potential for direct, indirect or cumulative impacts arising from the proposed Residential Development at The Boatyard, Carrigaline, Co. Cork either alone or in combination with any other plans or projects. The integrity of Cork Harbour SPA will not be adversely affected. No reasonable scientific doubt remains as to the absence of such adverse effects.”

I note the submissions received from Inland Fisheries Ireland, Irish Water, the Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media, the considerations of the planning authority’s Ecologist and Environment Sections, the further information and clarification received from the applicant, and the third party submissions.

Having reviewed the documents, submissions, reports and consultations, I am satisfied that the information allows for a complete assessment of any adverse effects of the development on the conservation objectives of Cork Harbour SPA alone, or in combination with other plans and projects.

7.9.3. **Appropriate Assessment**

Introduction

This assessment considers all aspects of the proposal which could result in significant effects and mitigation measures designed to avoid or reduce any adverse effects are considered and assessed. The assessment has had due regard to the applicant's submitted Natura Impact Statement, the further information submission in response to ecological matters, the clarification submission, the reports received by the planning authority and the Board, and third party submissions.

The following guidance is adhered to in the assessment:

DoEHLG (2009) Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities.

EC (2002) Assessment of plans and projects significantly affecting Natura 2002 sites. Methodological guidance on the provisions of Articles 6(3) and 6(4) of the Habitats Directive 92/43/EC.

EC (2018) Managing Natura 2000 sites.

Observations on Land Use

I note the following relating to this site:

- The site is a brownfield site. The site was formerly in use as a boatyard and it has been subject to significant development changes, including much of the site now comprising made ground.
- The site has been previously subject to applications for further development and there is an outstanding permission for 19 residential units.
- The site lies within the settlement boundary of Carrigaline as set out in the Ballincollig Carrigaline Municipal District Local Area Plan and has a Specific

Development Objective applicable to it, namely Objective CL-R-04: Medium A density residential development. It is, therefore, earmarked for residential development.

- Features remain on the site relating to established uses, including two warehouses, hardstanding areas and site access.
- The predominant habitat within the site consists of buildings and artificial surfaces. No flora of conservation interest or Annex II species were recorded on the site in surveys undertaken.
- No SCI species for Cork Harbour SPA, Annex I or Red listed birds were confirmed as breeding within the site during the applicant's surveying.
- None of the lands designated as part of Cork Harbour SPA will be directly impacted or removed as a result of the proposed development. There will be no direct impacts on this SPA.

European Sites

The following site is subject to appropriate assessment:

- Cork Harbour SPA (Site Code: 004030)

A description of the site and its Conservation and Qualifying Interests / Special Conservation Interests, including any relevant attributes and targets for the site, are set out in the NIS. Details of the European site's Conservation and Qualifying Interests / Special Conservation Interests are set out in the Screening undertaken earlier in this report.

Relevant Aspects of the Proposed Development

Section 1.3 of the applicant's NIS details the characteristics of the proposed works associated with the project and Section 5.4 identifies other plans, projects and activities relating to potential in-combination effects. As referenced in the Screening undertaken earlier, the main aspects of the proposed development that could adversely affect the conservation objectives of the European sites include:

- Vegetation clearance

- Demolition works and site excavation
- Construction of dwellings, services, access roads
- Construction of surface water and foul drainage systems
- Use of fuels, oils chemicals and concrete during the works
- Use of plant, equipment and machinery
- The presence of workers
- Occupation of the new development and associated activities

The potential effects would include:

- Displacement and disturbance of waterbirds arising from the works, including excavation, and presence of workers at the construction phase
- Displacement and disturbance of waterbirds at the operational phase due to the increase in human presence and associated activities
- Water quality impacts to coastal waters arising from surface water drainage and the provision of the rip-rap embankment at the perimeter of the site adjoining the estuary
- Indirect water quality impacts from contaminated sediment and accidental spillage of fuels, oils and chemicals

The site of the proposed development lies immediately north / north-west of Cork Harbour SPA. Section 5 of the applicant's NIS addresses the potentially significant impacts on the Special Conservation Interests of the SPA. Section 5.3 identifies the potential impacts on the attributes and associated targets for all over-wintering SCI species of the SPA. The following potential impacts are accepted:

- Disturbance to SCI species for the SPA.
- Changes in key indicators of conservation value such as decrease in water quality within the SPA.

Habitat Loss

There would be no loss of habitat within the SPA.

Habitat Alteration

Due to the development being in close proximity to the SPA and the existence of a drain along the site's eastern boundary, there is potential for receiving marine waters to be altered as a result of the ingress of pollutants during the construction phase, with the reduction of water quality potentially having a negative effect on water quality and the habitat which the birds of special conservation interest depend on for foraging. It is noted that the construction phase works would include excavation, drainage, house construction, stockpiling of materials, and the stability works relating to the rip-rap embankment.

During the operational phase, surface water and foul water discharges could potentially impact water quality in Cork Harbour.

Disturbance and/or Displacement of Species

The Owenboy Estuary is noted to be used as a wintering site for 16 of the 23 SCI species for the SPA. The proposed works at the construction phase would result in noise emissions and visual disturbance, which would potentially displace foraging and roosting wetland birds, due to demolition work and plant and machinery operations, with workers' activities on the site also likely reducing feeding activity and potentially forcing birds to seek alternative feeding areas. It is acknowledged that the works would be short-term. The established use on the site and the established noise environment is noted at this location, including existing residential development in the immediate vicinity of the site. The SPA is designated for one breeding bird, Common Tern. I acknowledge that the site of the proposed development is not located in the vicinity of any known breeding site for Common Tern.

The occupation and associated activities with the development of the residential estate on the site would potentially result in displacement of waterbirds, affecting the ongoing distribution and density of species in the immediate environs of the site.

Habitat or Species Fragmentation

There would be no habitat or species fragmentation within the SPA.

Considerations on the Effects on Conservation Objectives

The following is submitted:

- There would be no land take of any wetland habitats and the proposed development would take place outside of the SPA.
- The site is not known to support or to provide suitable habitat to support the SCI species for which the SPA has been designated.
- The disturbance impacts at the construction stage would be short-term. The impacts at both the construction and operational phases would be localised.
- Foul effluent generated by the proposed development would be treated at Shanbally Wastewater Treatment Plant, whose discharge to waters is obligated by licence to meet required water quality standards.

It is again repeated that potential for pollutants entering the marine environment from the proposed development could negatively impact on water quality, which could result in habitat modification and affect the distribution and/or abundance of prey. This could impact on the distribution of foraging birds. The potential for disturbance of roosting birds and foraging birds arising from the works is again acknowledged.

Having regard to the Conservation Objectives for the European site, to the 'Attributes' referenced, and the potential effects arising from the construction works and the operational phase of the residential development, it is concluded that appropriate robust mitigation measures would be necessary to avoid and/or ameliorate adverse effects.

7.9.4. Potentially Significant Cumulative Effects

The Board will note my considerations earlier in the Screening for AA in relation to in-combination / cumulative effects. The plans and projects associated with the Cork Harbour area and the various development pressures on the harbour have been identified by the applicant. I am again satisfied to determine that it may reasonably be concluded that there would not be significant in-combination / cumulative effects on bird species comprising the Special Conservation Interests of the Cork Harbour SPA.

7.9.5. Mitigation

Section 6 of the applicant's NIS details the range of mitigation measures intended to be employed as part of the proposed development at the construction and operational phases. I further note the applicant's further information submission to the planning authority, and in particular the landscaping revisions and the response to the submission from the Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media, as well as the findings of the wintering bird survey report, the provision of a preliminary construction management plan, and drainage details submitted by way of clarification.

I note that the range of construction phase mitigation measures proposed include the provision of a Construction Management Plan, the appointment of an Environmental Clerk of Works, the application of best practice guidelines for the control of impacts on water quality, timing of construction works to reduce impacts on avifauna using the inter-tidal and sub-tidal areas in the estuary and the development of the rip-rap embankment at low tide, noise control measures, and control of surface water runoff.

I note the operational phase mitigation measures include landscaping provisions and boundary treatment, control of access to the estuary, the application of SuDS features, and the treatment of foul waste at Shanbally WWTP. I acknowledge the surface water drainage system would include permeable paving, rain gardens, and a hydrocarbon interceptor. It is understood that Shanbally WWTP has sufficient capacity to accommodate the proposed development and that Irish Water has no objection to this proposal. The control of public lighting during the operational phase is also noted.

In my opinion, these constitute suitable, robust, comprehensive and necessary measures to avoid any adverse impacts on the integrity of Cork Harbour SPA.

7.9.6. Residual Impacts

I am satisfied to concur with the applicant's findings that, if the proposed mitigation measures are implemented in full, it is expected that significant effects would not result for the Species of Conservation Interest of Cork Harbour SPA.

Following my appropriate assessment of the proposed development and with due regard to consideration of the proposed mitigation measures, I am able to ascertain

with confidence that the proposed development would not adversely affect the integrity of Cork Harbour SPA in view of the Conservation Objectives of the site. This conclusion is drawn on a complete assessment of all implications of the proposed development alone and in combination with other plans and projects.

7.9.7. Appropriate Assessment Conclusion

The proposed development has been considered in light of the assessment requirements of the Planning and Development Act 2000 as amended.

Having carried out screening for appropriate assessment of the project, it was concluded that it may have a significant effect on Cork Harbour SPA. Consequently, an appropriate assessment was required of the implications of the project on the qualifying features of the site in light of its conservation objectives.

Following an appropriate assessment, it has been ascertained that the proposed development, individually or in combination with other plans or projects, would not adversely affect the integrity of Cork Harbour SPA (Site Code: 004030), or any other European site, in view of the site's Conservation Objectives.

This conclusion is based on a complete assessment of all aspects of the proposed project and there is no reasonable doubt as to the absence of adverse effects.

This conclusion is based on:

- A full and detailed assessment of all aspects of the proposed project including proposed mitigation measures and ecological monitoring in relation to the Conservation Objectives of Cork Harbour SPA.
- Detailed assessment of in-combination effects with other plans and projects including current plans and proposed projects in the area.
- No reasonable scientific doubt as to the absence of adverse effects on the integrity of Cork Harbour SPA.

8.0 Recommendation

- 8.1. I recommend that permission is granted in accordance with the following reasons, considerations and conditions. I consider that many of the conditions attached with the Board's previous decision under ABP-300038-17 remain relevant and should be accordingly attached to the decision in the event permission is granted.

9.0 Reasons and Considerations

Having regard to the location of the site on zoned lands within the town boundary of Carrigaline, the site's planning history, the layout of the proposed development, and the provisions of the Ballincollig – Carrigaline Municipal District Local Area Plan, 2017, it is considered that, subject to compliance with the conditions set out below, the proposed development would not seriously injure the residential amenities of neighbouring properties, would not seriously injure the visual amenities of the area, would not lead to a risk of flooding of the site or of neighbouring properties, would be acceptable in terms of pedestrian and traffic safety, and would not be prejudicial to public health. The proposed development would, therefore, be in accordance with the proper planning and sustainable development of the area.

10.0 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 22nd day of December, 2020 and the 16th day of April, 2021, 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. This permission authorises 38 residential units, only. Each proposed residential unit shall be used as a single dwelling unit.

Reason: In the interest of development control.

3. Finished floor levels of the proposed structures shall be in accordance with the site layout plan lodged with the planning authority on the 22nd day of December, 2020, unless otherwise agreed in writing with the planning authority.

Reason: In the interest of clarity and to obviate the risk of flooding.

4. Details of the materials, colours and textures of all the external finishes to the proposed residential units shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.

Reason: In the interest of visual amenity.

5. Details of the layout, the materials, and external finishes of the screen walls / fencing and all boundaries within and on the external boundaries of the development shall be submitted to, and agreed in writing with, the planning authority, prior to commencement of construction of the dwellings.

Reason: In the interest of residential amenity, and to ensure the provision of durable boundary treatment.

6. The areas of public open space shown on the lodged plans, including the open space adjoining the shoreline, shall be reserved for such use. These areas shall be levelled, contoured, soiled, seeded, and landscaped to the written satisfaction of the planning authority. This work shall be completed before any of the dwellings are made available by the developer for occupation and shall be maintained as public open space by the developer until taken in charge by the local authority. At the time of taking in charge, these open spaces shall be vested in the local authority, at no cost to the authority, as public open spaces.

Reason: In the interests of residential and visual amenity.

7. (a) The construction of the development shall be managed in accordance with a Construction Environmental Management Plan, which shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development. This plan shall provide details of intended construction practice for the development, including noise management measures and off-site disposal of construction/demolition waste.

(b) Site development and building works shall be carried out only between the hours of 08.00 to 19.00 Mondays to Fridays inclusive, between 09.00 to 14.00 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.

(c) The delivery of materials to the site during the construction phase shall be organised so that deliveries are minimised and do not cause traffic hazard. Deliveries are not permitted at peak times of traffic (08.00 hours to 09.00 hours and 16.30 hours to 18.00 hours).

(d) During construction, the developer shall provide adequate off carriageway parking facilities for all traffic associated with the proposed development, including delivery and service vehicles/trucks. There shall be no parking along the public road or footpath.

(e) The plan shall include a detailed and timed programme of works, taking account of timing restrictions required on certain phases of development, to prevent risk of any impact on birds.

Reason: In the interests of public safety and amenity.

8. Prior to the commencement of development, the developer shall submit to, and agree in writing with, the planning authority a detailed plan for the repair of the embankment wall. The plan shall identify the quantities and nature of material

to be removed from the existing wall, and provide details of the quantities and nature of material which is to be used to replace this. Detailed drawings of the final profile of the embankment wall shall be provided in the plan. The plan shall include details in relation to ecological monitoring, timing and works, and details relating to the proposed method for disposing of all materials removed from the site and all measures contained in the plan should be fully incorporated into the Construction and Demolition Environmental Management Plan.

Reason: In the interest of ecological protection.

9. All demolition, excavation and sea embankment repair works shall be supervised by an Ecological Clerk of Works who shall report on compliance with the Construction and Demolition Environmental Management Plan. The clerk of works shall be empowered to halt works where he/she considers that the continuation of the works is likely to result in a significant pollution or siltation incident. In the event of a water pollution incident, or of damage to the foreshore, these reports shall be made available to the relevant statutory authorities, and on-site works will cease until authorised to continue by the planning authority. A compliance monitoring report, prepared by the clerk of works shall be submitted to the planning authority at the end of the main construction period.

Reason: In the interest of ecological protection.

10. The development shall be carried out and completed in accordance with the "taking-in-charge" standards of the planning authority. The entire development shall be maintained by the developer until such time as it is taken in charge by the planning authority. No private management company shall be established to maintain the estate.

Reason: In the interest of ensuring that the development is carried out to appropriate standards, and to comply with national policy in relation to the taking in charge of housing estates.

11. (a) The internal road network serving the proposed development, including turning bays, junctions, parking areas, footpaths and kerbs, shall be in accordance with the detailed standards of the planning authority for such works, and shall comply with the provisions of the Design Manual for Urban Roads and Streets issued by the Department of the Environment, Community and Local Government and the Department of Transport, Tourism and Sport in March, 2013.

(b) The road junction at the entrance to the estate from Church Road shall be in accordance with the detailed standards of the planning authority for such works, and shall comply with the provisions of the Design Manual for Urban Roads and Streets.

(c) Details of proposed paving and internal road surfacing shall be submitted to, and agreed in writing, with the planning authority prior to commencement of development.

(d) Footpaths at entrances shall be designed to the satisfaction of the planning authority.

(e) Prior to the commencement of development works on site, proposals/details for road layouts, road finishes and speed control measures shall be submitted to, and agreed in writing with, the planning authority.

Reason: In the interests of visual amenity and of pedestrian and traffic safety.

12. Any and all demolition and/or tree felling work shall only be carried out in the period from September to February (inclusive). Prior to demolition or felling/a bat survey shall be carried out by a bat specialist, in respect of ascertaining the presence, if any, of bats or bat habitats within the structures or trees. Should any bats or bat habitat be found, the National Parks and Wildlife Service of the Department of Arts, Culture and the Gaeltacht shall be notified, and appropriate mitigation (removal/roost replacement) measures implemented in accordance

with its guidelines and under licence. No demolition or felling shall take place without this survey.

Reason: In the interest of ecological protection.

13. Water supply and drainage arrangements, including the attenuation and 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.

14. The applicant or developer shall enter into water and wastewater connection agreements with Irish Water, prior to commencement of development.

Reason: In the interest of public health.

15. Proposals for an estate/street name, house numbering scheme and associated signage shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development. Thereafter, all estate and street signs, and house numbers, shall be provided in accordance with the agreed scheme. The proposed name shall be based on local historical or topographical features, or other alternatives acceptable to the planning authority. No advertisements/marketing signage relating to the name of the development shall be erected until the developer has obtained the planning authority's written agreement to the proposed name.

Reason: In the interest of urban legibility and to ensure the use of locally appropriate place names for new residential areas.

16. All service cables associated with the proposed development (such as electrical, telecommunications and communal television) shall be located underground. Ducting shall be provided by the developer to facilitate the provision of broadband infrastructure within the proposed development. Proposals for the relocation of any existing overhead cables and/or utility poles

within the site shall be submitted to, and agreed in writing with, the planning authority before any development commences, or, at the discretion of the planning authority, within such further period or periods of time as it may nominate in writing.

Reason: In the interests of visual and residential amenity.

17. Public lighting shall be provided in accordance with a scheme, details of which shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development. Such lighting shall be provided prior to the making available by the developer for occupation of any house.

Reason: In the interests of amenity and public safety.

18. Prior to commencement of development, the applicant or other person with an interest in the land to which the application relates shall enter into an agreement in writing with the planning authority in relation to the provision of housing in accordance with the requirements of section 94(4) and section 96(2) and (3) (Part V) of the Planning and Development Act 2000, as amended, unless an exemption certificate shall have been applied for and been granted under section 97 of the Act, as amended. Where such an agreement is not reached within eight weeks from the date of this order, the matter in dispute (other than a matter to which section 96(7) applies) may be referred by the planning authority or any other prospective party to the agreement to An Bord Pleanála for determination.

Reason: To comply with the requirements of Part V of the Planning and Development Act 2000, as amended, and of the housing strategy in the development plan of the area.

19. Prior to commencement of development, the developer shall lodge with the planning authority a cash deposit, a bond of an insurance company, or other security to secure the provision and satisfactory completion of embankment reinstatement and landscaping, roads, footpaths, watermains, drains, open space and other services required in connection with the development, coupled

with an agreement empowering the local authority to apply such security or part thereof to the satisfactory completion, and maintenance until taken in charge, of any part of the development. The form and amount of the security shall be as agreed between the planning authority and the developer or, in default of agreement, shall be referred to An Bord Pleanála for determination.

Reason: To ensure the satisfactory completion of the development, and its maintenance until taken in charge by the local authority.

20. 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.

21. The developer shall pay the sum of €25,000 (twenty-five thousand euro) (updated at the time of payment in accordance with changes in the Wholesale Price Index – Building and Construction (Capital Goods), published by the Central Statistics Office), to the planning authority as a special contribution under section 48 (2)(c) of the Planning and Development Act 2000, as amended, in respect of pavement works proposed to be carried out by the local authority. This contribution shall be paid prior to commencement of

development or in such phased payments as the planning authority may facilitate. The application of indexation required by this condition 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.

Reason: It is considered reasonable that the developer should contribute towards the specific exceptional costs which are incurred by the planning authority which are not covered in the Development Contribution Scheme and which will benefit the proposed development.

Kevin Moore
Senior Planning Inspector

29th September 2021