

# Inspector's Report ABP-313644-22

**Development** Construction of a 2-storey dwelling,

detached double garage, wastewater treatment system and percolation

area, vehicular entrance and

associated drainage and site works

**Location** Elgarstown, Ratoath, Co. Meath

Planning Authority Meath County Council

Planning Authority Reg. Ref. 22340

Applicant(s) Gareth Flood and Gill O'Donohue

Type of Application Permission

Planning Authority Decision Refuse

Type of Appeal First Party

Appellant(s) Gareth Flood and Gill O'Donohue

Observer(s) None

**Date of Site Inspection** 15<sup>th</sup> August 2023

**Inspector** Ian Boyle

# 1.0 Site Location and Description

- 1.1. The appeal site is within the rural townland of Elgarstown, Ratoath, Co. Meath. It is a relatively flat section of agricultural land comprising perennial grasses. The property is roughly 2.5km west of Ratoath town centre and 5km east of Dunshaughlin. Access to the M3 Motorway is approximately 8km to the west via the R125 / M3 Interchange. The site is a short distance outside the Settlement Boundary for Ratoath.
- 1.2. The property has direct frontage onto Bog Road, which defines the eastern boundary of the site. The south and western site boundaries are not physically defined. The northern boundary is delineated by a mature hedgerow and laneway providing access to a shed / storage type structure to the west. Further north, across the laneway, is a row of four detached houses each are accessed from Bog Road. Bog Road is a narrow local route running in a general north-south direction. It has no centre line marking and there are tall hedgerows and deep drainage ditches running parallel on both sides of it.
- 1.3. The character of the surrounding area is rural with intermittent one-off housing, most of which comprises detached houses on spacious plots. This pattern of development is mainly linear and orientated to face directly onto the public road. There is a particular concentration of small clusters of such housing to the north and south along Bog Road.
- 1.4. The property has a stated area of approximately 0.31ha.

# 2.0 **Proposed Development**

2.1. The proposed development is for construction of a 2-storey house, double garage, wastewater treatment system and percolation area, vehicular entrance and associated site works.

# 3.0 Planning Authority Decision

#### 3.1. **Decision**

The Planning Authority refused permission in May 2022 for two reasons relating to ribbon development and adequate sightlines. They are summarised as follows:

- The proposed development is not in accordance with Policy RD POL 3 of the Meath County Development Plan 2021-2027 which is 'to protect areas falling within the environs of urban centres in this Area Type from urban generated and unsightly ribbon development and to maintain the identity of these urban areas'.
  - It would constitute an excessive concentration and density of development and exacerbate the level of ribbon development within this rural area. The proposed development would militate against the preservation of the rural environment, the efficient provision of public services and infrastructure and, therefore, be contrary to the Sustainable Rural Housing Guidelines for Planning Authorities (2005) and materially contravene the aforementioned Development Plan policies.
- 2. The Applicant has not shown that adequate visibility splays can be provided in each direction. Accordingly, the proposed development represents a traffic hazard.

## 3.2. Planning Authority Reports

#### 3.2.1. Planning Reports

- The subject site is in an Area Under Strong Urban Influence. Section 9.4 of the Meath County Development Plan 2021-2027 ('Development Plan') outlines the planning policy framework for housing in rural areas and requires an applicant to demonstrate a local housing need.
- While it is noted that the Applicant did not submit their local housing need details with the current application, they did so under a recent previous application (Reg. Ref. 21/1978). It is considered that on balance that they comply with the Local Needs Qualifying criteria.

- The Applicant has failed to demonstrate that the proposed development is in accordance with RD POL 3 of the Development Plan (re: ribbon development).
- Sightlines of 90m x 2.4m in both directions have not been appropriately shown at the near side of the public road.
- The proposed development is to be serviced by a new proprietary wastewater treatment and percolation area. A site characterisation form for the new proprietary wastewater treatment and percolation area has not been submitted. However, this information was provided as part of the previous application (Reg. Ref. 21/1978). The details submitted indicate favourable ground conditions.
- Given the extent of development along this roadside, it is considered that to permit the proposed development would result in an undesirable extension of disorderly ribbon development.
- The Applicant has failed to demonstrate adequate visibility splays. Further
  information could be sought regarding this issue. However, it is considered
  unreasonable to request FI on this matter when there is a fundamental
  concern regarding the principle of the development (i.e., ribbon development).
- It is recommended that permission be refused.

## 3.2.2. Other Technical Reports

<u>Transportation Department:</u> No objection, subject to conditions, including: the provision and maintenance of adequate sightlines, which must comply with TII standards and the Meath Rural Design Guide (i.e., visibility splays of 90m to the nearside road edge from a setback of 2.4m); removal and setting back of a section of hedgerow; positioning of the entrance pillars and gate to be at least 3m and 5m from the edge of the road, respectively; and other requirements relating to drainage and disposal of surface water runoff.

# 4.0 Planning History

Subject Site

Reg. Ref. 21/1978: The Planning Authority **refused** permission in December 2021 for the construction of a 2-storey house, double garage, wastewater treatment system and percolation area, vehicular entrance and associated site works.

The reasons for refusal were that the proposal was considered inappropriate ribbon development (and therefore against Policy RD POL 3 of the County Development Plan), that it would represent a traffic hazard and the proposed dwelling failed to integrate with its surrounding area and would be a visually obtrusive feature due to it size, scale and massing.

# 5.0 **Policy Context**

#### 5.1. Meath County Development Plan 2021-2027

#### General

The Meath County Development Plan 2021-2027 ('Development Plan') was adopted on 22<sup>nd</sup> September, 2021 and came into effect on 3<sup>rd</sup> November, 2021.

#### **Settlement Boundary**

The appeal site lies c. 500m outside the settlement boundary for Ratoath.

#### Rural Development Strategy (Chapter 9)

- Policy RUR DEV SP 2 is to ensure that individual house developments in rural areas satisfy the housing requirements of persons who are an intrinsic part of the rural community in which they are proposed, subject to compliance with normal planning criteria. An assessment of individual rural development proposals including one-off houses shall have regard to other policies and objectives in this Development Plan, and in particular Chapter 8 Section 8.6.1 UNESCO World Heritage Site of Brú na Bóinne.
- Policy RD POL 1 is to ensure that individual house developments in rural areas satisfy the housing requirements of persons who are an intrinsic part of

the rural community in which they are proposed, subject to compliance with normal planning criteria.

- Policy RD POL 2 is to facilitate the housing requirements of the rural community as identified while directing urban generated housing to areas zoned for new housing development in towns and villages in the area of the development plan.
- Policy RD POL 3 is to protect areas falling within the environs of urban centres in this Area Type from urban generated and unsightly ribbon development and to maintain the identity of these urban centres.
- Policy RD POL 40 is to restrict new accesses for one-off dwellings where the 80km per hour speed limit currently applies in order to safeguard the specific functions and to avoid the premature obsolescence of identified regional and important county link roads (see Map No 9.2) through the creation of excessive levels of individual entrances and to secure the investment in nonnational roads.
- Policy RD POL 43 is to ensure that the required standards for sight distances
  and stopping sight distances are in compliance with current road geometry
  standards as outlined in the NRA document Design Manual for Roads and
  Bridges (DMRB) specifically Section TD 41-42/09 when assessing individual
  planning applications for individual houses in the countryside.

#### Rural Area Types Development Pressure (Map 9.1)

The Development Plan identifies three rural area types in the county. These are shown on Map 9. 1.

The subject site falls within **Area 1 'Rural Area under Strong Urban Influence'** where the key challenge is to facilitate the housing requirements of the rural community while directing urban generated housing development to areas zoned for new housing in towns and villages.

#### Persons who are an Intrinsic Part of the Rural Community (Section 9.4)

The Planning Authority recognises the interest of persons local. or linked, to a rural area, who are not engaged in significant agricultural or rural resource related

occupation, to live in rural areas. For the purposes of this policy section, persons local to an area are considered to include:

'Persons who have spent substantial periods of their lives, living in rural areas as members of the established rural community for a period in excess of five years and who do not possess a dwelling or who have not possessed a dwelling in the past in which they have resided or who possess a dwelling in which they do not currently reside'.

#### 5.2. Project Ireland 2040 – National Planning Framework (NPF)

- 5.2.1. National Policy Objective (NPO) 19 states it is an objective to ensure, in providing for the development of rural housing, that a distinction is made between areas under urban influence, i.e. within the commuter catchment of cities and large towns and centres of employment, and elsewhere.
  - In rural areas under urban influence, facilitate the provision of single
    housing in the countryside based on the core consideration of demonstrable
    economic or social need to live in a rural area and siting and design criteria
    for rural housing in statutory guidelines and plans, having regard to the
    viability of smaller towns and rural settlements.
  - In rural areas elsewhere, facilitate the provision of single housing in the
    countryside based on siting and design criteria for rural housing in statutory
    guidelines and plans, having regard to the viability of smaller towns and rural
    settlements.
- 5.2.2. NPO 15 seeks to support the sustainable development of rural areas by managing the growth of areas that are under strong urban influence to avoid over-development, while sustaining vibrant rural communities.

#### 5.3. Sustainable Rural Housing Guidelines for Planning Authorities, 2005

5.3.1. The subject site is located within an 'Area under Strong Urban Influence' as identified in Map 1: Indicative Outline of the NSS rural areas types in the Sustainable Rural Housing Guidelines for Planning Authorities, 2005 ('Rural Housing Guidelines'). The Guidelines note that in these areas the objective should be on the one hand to

- facilitate the housing requirements of the rural community, as identified by the Planning Authority in the light of local conditions, while on the other hand directing urban generated development to areas zoned for new housing development in cities, towns and villages in the development plan.
- 5.3.2. These guidelines recommend against the creation of ribbon development for a variety of reasons relating to road safety, future demands for the provision of public infrastructure as well as visual impacts. Other forms of development, such as clustered development, well set back from the public road and served by an individual entrance can be used to overcome these problems in facilitating necessary development in rural areas.
- 5.3.3. Circular Letter SP 5/08 was issued after the publication of the guidelines on 30<sup>th</sup> September 2009. The letter states that all planning applications for houses in rural area, regardless of where the applicant comes from, or whether they qualify under specific criteria, must continue to be determined on the basis of proper planning and sustainable development of the area, in accordance with Development Plan policies regarding overarching environmental concerns, including the protection of natural assets, landscape, siting and design, traffic safety, etc.

# 5.4. Eastern and Midland Regional Assembly Regional Spatial & Economic Strategy (RSES) (2019-2031)

- 5.4.1. Section 4.8 of the RSES recognises the major contribution that rural places make towards regional and national development in economic, social and environmental terms. Rural areas in the Region, including the Gaeltacht area, contribute to Ireland's unique culture and identity, and provide significant natural resources, biodiversity, environmental qualities and landscape features.
- 5.4.2. The NPF and RSES make a distinction between areas under urban influence, i.e. within the commuter catchment of cities and large towns and centres of employment, and rural areas outside these catchments. In such areas a more flexible approach based primarily on siting and design will apply.
- 5.4.3. For some rural areas, urban and commuter generated development has undesirably affected the character and cohesion of these locations. Simultaneously, in less

- accessible rural locations, population levels have declined and it has been difficult to sustain basic services and community facilities at these locations.
- 5.4.4. Regional Policy Objective (RPO) 4.80 states that 'local authorities shall manage urban generated growth in Rural Areas Under Strong Urban Influence (i.e. the commuter catchment of Dublin, large towns and centres of employment) and Stronger Rural Areas by ensuring that in these areas the provision of single houses in the open countryside is based on the core consideration of demonstrable economic or social need to live in a rural area, and compliance with statutory guidelines and plans, having regard to the viability of smaller towns and rural settlements.
- 5.4.5. By contrast, RPO 4.81 states that 'in rural areas outside the Rural Areas Under Strong Urban Influence local authorities shall encourage sustainable growth in areas that have experienced decline or stagnation, facilitate the provision of single houses in the countryside based on siting and design criteria for rural housing in statutory guidelines and plans, having regard to the viability of smaller towns and rural settlements.

#### 5.5. Natural Heritage Designations

5.5.1. The site is not affected, or in the vicinity, of any European Site.

#### 5.6. EIA Screening

5.6.1. Having regard to the limited nature and small scale of the proposed development, which is for a single dwelling and wastewater treatment system, and the absence of any significant environmental sensitivity in the vicinity, there is no real likelihood of significant effects on the environment arising from the proposed development. The need for environmental impact assessment can, therefore, be excluded at preliminary examination and a screening determination is not required.

# 6.0 The Appeal

#### 6.1. **Grounds of Appeal**

#### Response to Refusal Reason No. 1

- 'Ribbon development' is not defined in the Meath County Development Plan 2021-2027 ('Development Plan'). However, the Rural Housing Guidelines provide a definition which states that ... 'areas characterised by ribbon development will in most cases be located on the edges of cities and towns and will exhibit characteristics such as a high density of almost continuous road frontage type development, for example where 5 or more houses exist on any one side of a given 250 metres of road frontage'.
- It is evident that the site does not fall within this criterion for ribbon development as there are only four houses along this side of the roadway for a distance of 250m. This is shown on drawings submitted as part of the current and previous applications (i.e., Reg. Ref. 22/340, drwg. no. 446 A3-00F).
- There is no definition for 'urban generated development' under the
  Development Plan. However, the proposed development can be described as
  'rural generated housing' as per the description included in the Rural Housing
  Guidelines.
- The Applicant has demonstrated that a local housing need exists. The
  proposal does not constitute ribbon development and is not urban generated
  development. Therefore, Policy RD POL 3 does not apply.

#### Response to Refusal Reason No. 2

- The Planner's Report incorrectly states that no report was completed by the Council's Transportation Section. However, such a report was completed and no objection to the proposed development was raised.
- Further details regarding photos, measurements and boundary treatments in relation to the proposed entrance have been provided as part of the appeal (Figs. 4 and 5 of the appeal submission). This is without prejudice to the recommendations of the Council's Transportation Section.

#### 6.2. Planning Authority Response

- The proposed development is not considered consistent with the policies and objectives as outlined in the Meath County Development Plan 2021-2027.
- The Planning Authority requests that the Board uphold the Decision to refuse permission.

#### 7.0 Assessment

The main planning considerations relevant to this appeal case are:

- Ribbon Development
- Site Access
- Appropriate Assessment

#### 7.1. Ribbon Development

- 7.1.1. The proposed development is for a two-storey dwelling with ancillary works, including a double garage, wastewater treatment system and new vehicular entrance. The proposal also includes associated drainage and landscaping works.
- 7.1.2. The Planning Authority's first Reason for Refusal is that the proposed development would result in the exacerbation of ribbon development for the area. The Decision specifically states that the proposal is not in accordance with Policy RD POL 3 of the Meath County Development Plan 2021-2027. This policy is to protect areas falling within the environs of urban centres in 'rural areas under strong urban influence' from urban generated and unsightly ribbon development and to maintain the identity of these urban areas. The Decision also states that the proposal would constitute an excessive concentration and density of development and exacerbate ribbon development in this rural area. It would militate against the preservation of the rural environment, the efficient provision of public services and infrastructure and, therefore, is considered contrary to the Sustainable Rural Housing Guidelines for Planning Authorities (2005) and that it would materially contravene Policy RD POL 3 of the County Development Plan.

- 7.1.3. I note that the Planning Authority did not raise any issues with the Applicant's bona fides insofar as compliance with the criteria for local housing need is concerned, stating that they, i.e., the Applicant, would appear to comply with this. The Planner's Report states that the Applicant did not outline their local housing need details in the current application but that, instead, regard was had towards a recent previous application on the site made under Reg. Ref. 21/1978. The Planning Authority took this information into account as part of their assessment and considered, on balance, that the Applicant complies with the relevant policy regarding location specific rural housing need.
- 7.1.4. The merits, or otherwise, of an individual proposal should normally be centred on the documentation submitted as part of that particular application. However, in this instance, I note that the Applicant is the same person for both applications and that the previous application was made recently, in October 2021, with only a short period of time passing before the subsequent and current application was lodged. I would therefore concur with the Planning Authority and consider the Applicant satisfies the requirement for local housing need as set out under Section 9.4 of the County Development Plan. In other words, the Applicant has sufficiently demonstrated that he has grown up living in a rural part of the county and has provided sufficient documentary evidence showing same.
- 7.1.5. In terms of addressing the matter of ribbon development, I note that the County Development Plan identifies three 'rural area types' in the county. These are shown on Map 9. 1 ('Rural Area Types: Development Pressure'). The subject site falls within Area 1 'Rural Area under Strong Urban Influence' where, I note, the key challenge is to facilitate the housing requirements of the rural community while directing urban generated housing development to areas zoned for new housing in towns and villages. I note that the site is also designated in the Sustainable Rural Housing Guidelines 2005 (Map 1 'Indicative Outline of NSS Rural Area Types') as an 'Area under Strong Urban Influence'.
- 7.1.6. Section 9.3 of the Development Plan states that these types of areas exhibit characteristics of proximity to the immediate environs or close commuting catchment of Dublin, with a rapidly rising population and 'evidence of considerable pressure for development of housing' due to proximity to urban locations. Rural areas under

- strong urban influence include the commuter-belt and peri-urban<sup>1</sup> areas of the county. They are experiencing the most development pressure for one-off rural housing and act as attractive residential locations for the inflow of migrants into the county.
- 7.1.7. I note the Applicant's argument regarding the definition of ribbon development. They state that as this section of Bog Road i.e., directly north of the appeal site has only four dwellings across a distance of 250m that ribbon development is not apparent in this location. They submit that as the number of houses is less than five, the proposal does not fit the definition of ribbon development as for provided in the Rural Housing Guidelines.
- 7.1.8. Whilst I acknowledge that this isolated section of public road comprises four dwellings on its western side, I also note that the Guidelines cite the number of five houses as an 'example' only, and that other factors should be taken into account when considering the matter of what constitutes haphazard ribbon development. The Guidelines state that areas characterised by ribbon development will in most cases be located on the edges of cities and towns and exhibit certain characteristics, such as a high density of almost continuous road frontage type development. In this regard, I note that the appeal site lies a short distance, c.500m, outside the settlement boundary for Ratoath and there is clear evidence of sustained pressure for new housing development in the surrounding area, in my opinion.
- 7.1.9. The area is part of an existing ad hoc conglomeration of sporadic rural houses in the townland of Elgarstown, towards the southeast of the county, and approximately 2.5km west of Ratoath town centre. The site is roughly a 20min drive (15-20km) to other larger suburban centres, including Blanchardstown and Mulhuddart, which are serviced by the N3 (national primary route) and M50 motorway. In terms of Bog Road itself, there are several pockets of one-off housing clusters along its full length which have direct road frontage. These clusters often continue for long stretches and are very evident from the roadside.

<sup>&</sup>lt;sup>1</sup> The Development Plan defines peri-urban areas as parts of the open countryside that have been subjected to very high levels of urban generated adjustment.

- 7.1.10. Whilst the Applicant has focussed on a small, isolated section of Bog Road to support their argument, I consider that a wider overview and assessment of the prevailing emerging character of the broader area provides a more accurate depiction of the urban pressures affecting the area. This part of the County clearly shows signs of ad-hoc, haphazard housing development, in my opinion, which is against the local and national planning policy position.
- 7.1.11. During my physical inspection of the site, and its surrounding area, it was apparent that the area in question is under significant pressure for new housing. The predominant type of housing is one-off, detached houses extended out along the surrounding road network. Many locations within the area, including for long sections north and south of Bog Road, have a high volume of one-off rural dwellings and, whilst the site itself is essentially rural in nature, it is evident that there is a strong demand for new individual houses. In addition to my site inspection, I have viewed aerial photography and other maps of the surrounding area and consider it dense with housing for what is a rural setting. There are numerous instances where single dwellings are present and face directly onto Bog Road within a short distance of the appeal site, both to the north and south.
- 7.1.12. I consider that the proposed development would add to the extensive presence of one-off housing that has been permitted to develop and evolve in this rural area. It would very clearly add, in my opinion, to the excessive pattern of ribbon development that already persists in this rural setting. I consider that the intensity of one-off housing has become so concentrated in this area that its rural character is being gradually eroded and changed over time. It is being slowly and incrementally transformed into a peripheral suburban and peri-rural character, which is precisely the type of transitory environment the Council's Rural Development Strategy is seeking to discourage.
- 7.1.13. The County Development Plan and national policy has been formulated to manage such rural housing patterns and to avoid a proliferation of one-off houses, extensive ribbon development, and piecemeal and haphazard development. In this regard, Policy RD POL 3 of the County Development Plan is relevant and seeks to protect 'rural areas under strong urban influence' from falling within the environs of existing urban centres from urban-generated and unsightly ribbon development and to

- maintain the identity of these urban centres. I consider that the proposed development would be against this policy.
- 7.1.14. I also note that the Sustainable Rural Housing Guidelines (Appendix 4) recommends against the creation of ribbon development for a variety of reasons including, for example, future demands for the provision of public infrastructure as well as visual impact. In characterising such development, the Guidelines reference a high density of almost continuous road frontage type development. The further incremental expansion of ribbon development caused by the proposal along Bog Road would be against the provisions of the Guidelines as they relate to ribbon development, in my view.
- 7.1.15. I conclude that the proposed development, if permitted, would contribute to an increasing pattern of suburbanisation in this rural area, which is under significant urban pressure, and would exacerbate the continuation of further piecemeal and haphazard development. The proposal would, therefore, be contrary to the proper planning and sustainable development of the area and should be refused permission for this reason, in my opinion.

#### 7.2. Site Access

- 7.2.1. The Planning Authority's second Reason for Refusal is that adequate visibility splays were not shown as part of the application for the proposed site access. It was therefore considered that the proposed development would represent a traffic hazard and that it should be refused permission.
- 7.2.2. I have referred to the documentation on file, including that submitted as part of the original application and first party appeal. The Applicant proposes sightlines of 90m in each direction with a setback from the road edge at 2.4m, which is the correct design standard in this regard as per the Design Manual for Roads and Bridges (DMRB).
- 7.2.3. The proposed new entrance and vehicular access is from Bog Road (L-5017). It is classified as a Local Secondary Road with an 80kph speed limit. The road is relatively narrow and there is no centre line marking. There is a dense hedgerow running along the front (eastern) part of the site and it forms the roadside

- boundary. During my site inspection, I observed that the flow of traffic was low, but steady with roughly equal volumes of traffic traveling in each direction.
- 7.2.4. This section of Bog Road is relatively straight with no acute bends or corners. There are no obvious bumps or hollows which might otherwise impair visibility for vehicles exiting the site. There is a general absence of large or sizable physical features, such as utility structures, sheds/outbuildings, or trees falling within the splay areas. I note that a partial section of the hedgerow running along the front of the site may potentially impede sightlines. However, this could be removed, and setback from the road edge, and that an acceptable way to achieve this would be under condition. Map 9.2 of the County Development Plan is in relation to the management of future access to strategic corridors. It identifies certain regional and important county link roads for which new accesses for one-off dwellings are to be restricted (Policy RD POL 40 refers). However, Bog Road (L-5017) is not referenced on this map.
- 7.2.5. In summary, I consider that safe access and egress can be achieved as part of the proposed development and that adequate sightlines would be possible in each direction. I have also reviewed the interdepartmental report completed by the Council's Transportation Section and note that they have no objection, subject to conditions.
- 7.2.6. In conclusion, and in having regard to the physical condition and alignment of Bog Road, and the additional information provided as part of the application and first party appeal, I consider that the proposed development would not give rise to an unacceptable traffic hazard.

# 7.3. Appropriate Assessment

7.3.1. Having regard to the nature and small scale of the proposed development; which is for a single detached dwelling, installation of a septic tank and treatment system and associated site works, and the distance from the nearest European site and intervening land uses; no Appropriate Assessment issues arise. Therefore, it is not considered that the proposed development would be likely to have a significant effect, individually, or in combination with other plans or projects, on a European site.

#### 8.0 Recommendation

8.1. I recommend that planning permission be refused for the reasons and considerations set out below.

#### 9.0 Reasons and Considerations

9.1. Having regard to the location of the site within a 'Rural Area under Strong Urban Influence' (Area 1) as designated in the Meath County Development Plan 2021-2027, to the expanse of one-off housing and the prevailing pattern of ribbon development in the area, and to the provisions of the Sustainable Rural Housing Guidelines for Planning Authorities (2005), it is considered that the proposed development would contribute to the encroachment of random rural development in the area, exacerbate the pattern of ribbon development, and militate against the preservation of the rural environment and the efficient provision of public services and infrastructure. The proposed development would, thus, be contrary to the provisions of the Meath County Development Plan 2021-2027 as they relate to ribbon development, including Policy RD POL 3 which seeks to protect rural area under strong urban influence from falling within the environs of urban centres from urban-generated and unsightly ribbon development and to maintain the identity of these urban areas, and the Sustainable Rural Housing Guidelines for Planning Authorities (2005), which recommends against the creation of ribbon development. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.

[I confirm that this report represents my professional planning assessment, judgement and opinion on the matter assigned to me and that no person has influenced or sought to influence, directly or indirectly, the exercise of my professional judgement in an improper or inappropriate way.]

Ian Boyle Senior Planning Inspector

16th August 2023