



An
Bord
Pleanála

Inspector's Addendum Report 313944-22

Development	18 no. 2-storey, detached dwellings and associated development.
Location	Holmpatrick, Rush Road (R128), Skerries, Co. Dublin.
Planning Authority	Fingal County Council
Planning Authority Reg. Ref.	F22A/0187
Applicant(s)	Jolview Limited
Type of Application	Permission
Planning Authority Decision	Refuse Permission
Type of Appeal	First Party v. Decision
Appellant(s)	Jolview Limited
Observer(s)	(1) Mary Horan (2) Gerald Horan (3) Olive Sarsfield (4) Diarmiud McHugh & Others (5) Alison Ryan (6) Paul O'Sullivan

Date of Site Inspection

16th October 2023

Inspector

Louise Treacy

1.0 Introduction

- 1.1. This Addendum Report should be read in conjunction with the original Inspector's Report on this appeal case dated 19th February 2024 which recommended that planning permission be refused for the proposed development.

2.0 Board Correspondence

- 2.1. The Board issued a statutory notice on 22nd April 2024 under Section 137 of the Planning and Development Act, 2000 (as amended) which states the following:
- “The Board noted that since the receipt of the appeals and responses to same, including observations on the appeals, the Fingal Development Plan 2023-2029 has come into effect and the Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities (2024) have been published.

In this regard, the Development Plan now in effect includes new policies, objectives and development management standards as they relate to matters including the need for a masterplan in relation to the zoning of the site, landscape and amenity designations, sequential growth, residential density and mix of housing types and sizes.

You are therefore invited to submit any submission or observation that you may wish in relation to the considerations outlined above as they relate to the subject appeal”.

- 2.2. Submissions/observations were invited on/before 20th May 2024.

3.0 Responses to Board Correspondence

3.1. First Party Response

- 3.1.1. A first party response was received from the applicant on 20th May 2024 which can be summarised as follows:

- The proposed development is consistent with Objective SPQHO10 in relation to new residential development. The site comprises zoned land, is adjacent to Holmpatrick Rural Cluster and is connected to Skerries by public transport and through the proposed comprehensive network of pedestrian and cycleways.

- The Masterplan objective has been removed from the site and as such, the residential zoning which applies is the primary planning consideration.
- A site and monument record has been added to the subject site. An archaeological assessment has been undertaken as part of the first party appeal. Under the previous application on the site, this archaeology was identified and proposed for “recording” and it is requested that the Board make a similar recommendation in this case.
- The scheme design has taken account of the Greater Dublin Area Cycle Network which has been repositioned towards the coast.
- There is a specific objective to preserve views from the R128 regional road to the west of the application site. An Assessment of the Visual Impact on the Built Environment and photomontages were submitted as part of the planning application.
- Day-to-day facilities are provided within Skerries, with the site being 2km from the town centre. Significant additional development is proposed and being built-out within 1 km of the site. Taken together, these proposals significantly increase the population of the surrounding area, enhance the availability of childcare and community facilities and provide substantial new highway infrastructure to support the Holmpatrick development.
- All the proposed dwellings have 4-bedrooms and are tailored to “upsizers” who are moving to a larger family home. The scheme should be read in tandem with the range of housing that surrounds the site. Many new schemes on larger sites in Skerries are coming on stream and offer a range of different houses and apartments that will serve a very different market to the current proposal.
- All units are well in excess of the minimum floor areas and can be readily adapted to meet the changing needs of residents. The development significantly exceeds all the qualitative policy standards, including in relation to public and private open space.
- The development prioritises the creation of a comprehensive network of pedestrian and cycleways aligning with the principles of DMURS. The

placement of road intersections and other infrastructure has been carefully planned to avoid traffic hazards and enhance the overall safety of the development.

- The site comprises a “Suburban/Urban Extension” zone with reference to the Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities, 2024. The Guidelines recommend net densities of 30-50 dph. A density of 8.2 dwellings per ha is proposed to ensure a “green” landscape sensitive development can be provided within this area of key views and high amenity value.
- The proposal fully considered the design of Sustainable Drainage Systems.
- The development is designed to integrate with and enhance the existing pattern and form of the surrounding area.
- The proposal is consistent with the requirements of the Sustainable Residential Development and Compact Settlement Guidelines in relation to separation distances, private open space for houses, public open space, waste management and daylight.
- Planning permission should be granted on these appropriately zoned lands that are serviced and connected to the centre of Skerries.

3.2. Third Party Responses

- 3.2.1. A number of third-party responses have been received on foot of the Board’s invitation. Several of the responses include references to historic interactions between the parties, with local councillors and with Fingal County Council. References are also made to alleged unauthorised development which may have occurred on some third-party lands. For the avoidance of doubt, I would note that the issues identified above are not matters which can be taken into consideration in the adjudication of this appeal case.
- 3.2.2. Submissions have been received from: (1) Paul O’Sullivan, 16 Hacketstown Cottages, Rush Road, Skerries, Co. Dublin - which includes a copy of the Chief Executive’s Report on the Public Consultation on the Draft Fingal Development Plan 2023-2029 and copies of correspondence with local councillors, (2) Mary Horan, Iniscealtra, Ballyhavil Lane, Rush Road, Skerries, Co. Dublin - which includes maps

and photographs of the site and a letter of support from Sinéad Lucey Brennan, (3) Gerald Horan, Ballyhavil Lane, Skerries, (4) Alison Ryan, 73 Holmpatrick, Skerries, Co. Dublin, (5) Olive Sarsfield and Seamus Sarsfield, Ballyhavil Farm, Rush Road, Skerries (who have no further observations or submissions to make).

3.2.3. The issues which are raised can be summarised as follows:

(1) The proposed development does not comply with the Sustainable and Compact Settlements Guidelines for Planning Authorities or the 2023-2029 Fingal Development Plan – dispersed settlement which would continue urban sprawl on sensitive lands in Fingal’s coastal corridor.

(2) The draft County Development Plan proposed these lands be zoned for High Amenity purposes, but the elected members decided to rezone them RS.

(3) The proposed development is contrary to Objective SPQHO12 (Fingal Settlement Strategy) and Objective SPQHO10 (New Residential Development) of the development plan.

(4) The proposed development is outside the boundary of Skerries and is unsafe for pedestrians and cyclists and is not accessible by persons with impaired mobility. The site is not well served by public transport.

(5) The development is urban generated and should be prohibited as per Objective SPQHO51 which seeks to prohibit such development in the open countryside.

(6) The proposed development does not support the aims and objectives of the European Landscape Convention.

(7) The lands meet the criteria for High Amenity zoning.

(8) The loss of the Masterplan objective from the lands is a major loss to the community as the previous development plan contained a substantial open space zoned component dedicated to public amenity.

(9) The site is incongruously zoned for residential purposes, sited between lands zoned for Greenbelt, High Amenity and Rural Cluster. The proposed development is on elevated ground, highly visible from the sea.

(10) The proposed development is contrary to the principles of compact growth and is car dependent. The projected development is perceived as a potentially dispersed

settlement, unfeasible and deleterious to the economy, the environment and quality of life in general.

(11) The proposed development would result in the loss of farmland and habitat.

(12) The proposed development is outside the development boundary of Skerries.

(13) The proposed density is in keeping with the adjoining housing and is sensitively designed and appropriate for its setting. It reflects the density agreed in the now obsolete Holmpatrick Masterplan, that was adopted by Fingal County Council in 2013.

(14) The location is sequential development as demonstrated by independent evidence-based studies in the Draft Development Plan.

(15) An Bord Pleanála upheld a decision in February 2024 that the land is liable under the Taxes and Consolidation Act stating that the land is “within an established urban area, zoned RS-Residential use in accordance with the Fingal Development Plan 2023-2029, with services available and no capacity or other reasons have been identified that would prevent the development of these lands for residential purposes”.

(16) The zoning of the land has been approved six times by the elected members of the Council and is fully supported by the five local councillors who are most familiar with the land and its location. The site is suitable for development, and it is requested that the Board grant permission for the proposal.

(17) The proposal will cause light pollution and light spillage will be visible from the road and the planned walkway and cycleway into the town.

3.3. Planning Authority Response

- 3.3.1. A response was received from the Planning Authority on 23rd May 2024 which identifies relevant policies, objectives and development management standards from the Fingal Development Plan 2023-2029. The Planning Authority notes that the current policy context as it pertains to the site is generally similar to the previous plan in terms of the need to protect and respect highly sensitive landscape areas. It is also noted that Objective CSO72 seeks inter alia, to deliver compact growth and sequential development of the settlement. Objective SPQHO2 is also identified which will prioritise sustainable, active transport modes and encourage the

development of car-free neighbourhoods and streets. The Board is requested to uphold the Planning Authority's decision.

3.4. First Party Response to Third Party Submissions

3.4.1. The applicant submitted a response on the third-party submissions on 12th June 2024 which can be summarised as follows:

- **Alison Ryan's** support of the proposed development is welcomed.
- The submission of **Gerald Horan** claims that the proposed development does not comply with the Sustainable Residential Development and Compact Settlements Guidelines. A comprehensive outline of how the proposed development complies with these Guidelines has already been provided to the Board.
- The submission of Gerald Horan also notes the site's location in a highly sensitive landscape and development plan policies and objectives concerning green infrastructure. The proposed development protects the existing landscape of the site, while also enhancing and promoting green infrastructure within it.
- The submission of Gerald Horan notes the site's proximity to Skerries Island SPA and NHA. The applicant's NIS sets out mitigation measures to ensure the proposed development would not have any significant impacts on nearby European sites.
- Gerald Horan's statement that a masterplan is required for the site is incorrect and this objective was removed from the site under the current development plan.
- The submission of **Mary Horan** also notes the importance of Masterplans, but this is not required for the application site and this comment can be disregarded.
- The Greenbelt policy and objectives cited by Mary Horan can be disregarded as the site is not located in a greenbelt. No works are proposed on any land zoned Greenbelt as part of this application.

- The submission of Mary Horan outlines a concern that the proposed development will impact on Ballyhavil Farm to the south of the site. The proposed development is on privately owned land and will not have any negative effect on its surrounding lands and will not provide for any loss of farmland. The owners of the farm have made a submission stating they have no objection to the proposed development.
- A Construction Management Plan and Construction Demolition Waste Management Plan will be prepared for the proposal to ensure no impact on the surrounding lands during the construction of the proposed development.
- The submission of **Sinead Lucey Brennan** in support of Mary Horan raises concerns regarding existing traffic levels in the area. The proposed development will use the existing access from the R128 and will not provide any traffic hazard through the introduction of a new access point along this road. A Traffic and Transport Assessment formed part of the application and provides details of access, sightlines, parking and public transport.
- Full details were provided in the application on water supply, sewage and surface water drainage.
- The submission of **Paul O'Sullivan** that the lands were proposed to be zoned as 'HA – High Amenity' during the preparation of the draft development plan can be disregarded.
- The information submitted with the application in relation to lighting confirms that the proposal will not cause any light spill or lead to any light pollution.
- The applicant concurs with the submission of Seamus Sarsfield and Olive Sarsfield.

3.5. First Party Response to Planning Authority Response

3.5.1. The applicant's submission of 12th June 2024 also addresses the Planning Authority's response as summarised below:

- Lands zoned for open space purposes on the eastern part of the site do not form part of the application boundary as stated in the submission of Fingal County Council.

- The development of the subject site is consistent with its zoning objectives and would consolidate the development of the area of Holmpatrick and Skerries. The Planning Authority previously decided to grant permission on the land for a housing and tourism development (Planning Authority Reg. Ref. F16A/0085), which indicates that Fingal County Council also considered the lands suitable for residential development.
- The proposal seeks to provide 8 no. house types within the site to ensure appropriate variety is provided.
- There are 3 bus stops in the immediate vicinity which collectively provide 15-minute services towards Skerries, Abbey Street, Balbriggan, Swords, Stephenstown Industrial Estate and Dublin Airport.
- Various SuDS devices have been implemented to ensure runoff is treated to the standards of the Greater Dublin Sustainable Drainage Strategy.
- Fingal County Council was satisfied with the submitted NIS which set out a number of mitigation measures to ensure that the proposed development would not have any significant impacts on nearby European sites.
- An Environmental Impact Assessment is not required for this project.
- An Architectural Design Statement was included with the planning application.
- The proposed development complies with the development plan objectives in relation to New Residential Development (DMSO19), Schedule of Accommodation (DMSO20), Separation Distances (DMSO23), Separation Distances between Side Walls of Units (DMSO26), Floor Plans for Residential Development (DMSO21), Private Open Space (DMSO27), Flood Risk (DMSO212), Refuse Storage Areas (DMSO239) and Bicycle Parking (DMSO109) and car parking.
- The development seeks to minimise the impacts on climate change by providing renewable energy measures on site and within the houses, such as an air-to-water heat pump for space heating and electricity, low energy lighting and water reduction installations, as well as design and construction measures to reduce heat loss.

- The proposed development does not interfere with or affect the implementation of Local Objective 6 (provide for glamping accommodation and ancillary service building) on the lands to the east.
- While Fingal County Council notes that the subject site is located on lands identified as a Highly Sensitive Landscape, the objectives concerning these lands do not provide a blanket ban on development but rather set criteria against which developments should be considered. The submitted Visual Impact Assessment reports that the proposed development would have no impact from many of the identified viewpoints.
- The proposed development will protect and enhance the landscape value of the site through the open space within the development.
- The proposed development complies with all policies and objectives raised in the submission of Fingal County Council.

3.6. Third Party Responses to Re-circulated Submissions

3.6.1. Responses were received from the third parties on the cross circulated submissions as follows:

3.6.2. (1) From Alison Ryan on the submission of Paul O’Sullivan:

- Local councillors did not support the proposed rezoning of the land as intended by the executive.
- The Board should consider whether the submission is vexatious.

3.6.3. This submission includes copies of the Chief Executive’s report on the public consultation on the Draft Fingal Development Plan 2023-2029 and copies of the Skerries News publication.

(2) From Alison Ryan on the submissions of Gerald and Mary Horan:

- The submissions contain vexatious elements.
- The letter from Sinéad Lucy Brennan as appended to the submission of Mary Horan should be omitted from the Board’s considerations.
- The observers are primarily concerned with their own interests rather than the proper planning and sustainable development of the area.

3.6.4. This submission includes a map and correspondence in relation to a change of zoning for a plot of land in Balbriggan, aerial images in relation to an extension to the house of Gerald Horan and photographs of alleged damage to the hedgerow adjoining the site.

(3) Alison Ryan on the submission of Fingal County Council:

- The claims that the land is remote from Skerries is disingenuous and misleading.
- The residential land is in a cove setting and is in the most part, not visible from the town and the road.
- Houses have been built on the ridgeline since the 1980s and the proposed development is set well below that skyline.
- The statement that there are no existing services or development within the immediate vicinity of the site contradicts all previous studies undertaken and ratified by the council in both planning and masterplanning.
- The land is considerably closer to the town centre than recent developments to the north of Skerries and is connected by footpaths and public lighting.
- Fingal County Council has disregarded the Dublin Bus service that runs past the site.
- The development of car free neighbourhoods and sustainable transport modes should not be used as a refusal reason in light of car ownership in the country as a whole.
- The inclusion of the Rural Cluster designation in the development plan is inappropriate and the development boundary of the town should include the Rush Road area.
- The density of the proposed housing reflects the density and character of the surrounding area in the Rural Cluster, otherwise known as the Skerries Settlement.
- The site's planning history and the refusals of permission issued by An Bord Pleanála are detailed in the CEO's assessment and refusal. There is no

mention of the detailed Masterplan that was adopted by Fingal County Council in 2013.

- Previous refusal reasons based on the substandard entrance were unsound and vexatious.

3.6.5. The submission includes copies of supplementary information on the Draft Fingal Development Plan 2023-2029, extracts from the Fingal Development Plan 1999, photographs of the site and copies of legal correspondence from the circuit court in relation to the site entrance laneway.

(4) Alison Ryan on the observation of Seamus and Olive Sarsfield

- No comment to make on the submission.

(5) Paul O'Sullivan on the submissions of the Applicant, Fingal County Council, Alison Ryan and Mary Horan

- The applicant's submission ignores Objective SPQHO10 and seeks to create a false equivalence with the previous RA/RS zoning objectives.
- An Bord Pleanála needs to consider whether these lands are appropriately zoned. The RS zoning should be disregarded by the Board when considering this appeal.
- The RS zoning is inappropriate as the lands are located in a sensitive coastal area.
- The Board should consider a submission made by the applicant's agent on a 2017 application on the site.
- Local bus services do not operate every 15 minutes as asserted by the applicant.
- The proposed location is outside of the town boundary, is poorly served by public transport and has a substandard footpath on the western side of the regional road only.
- The proposed development will be car dependent, will be unfavourable to active travel and permission should be refused.

- Poor sightlines to the north of the site entrance and the proposed access will create an unacceptable traffic hazard.
- Development plan policies concerning climate action energy statements, preservation of landscape types, design of rural housing, development management standards in rural areas, preservation of greenbelts, development and the coast, development and landscape, sensitive areas, protection of skylines, and compact development are relevant to the case.

3.6.6. The submission includes a copy of a Council Motion regarding the zoning of the land and a copy of an appeal lodged with An Bord Pleanála in 2017 against a development on a larger site, which encompassed the current appeal site.

(7) Mary Horan on the Applicant's submission

- The changes to the planning policy context have strengthened Fingal County Council's refusal of permission.
- The applicant's response is intended to convey the impression that the proposed development complies with the latest policy documents, including in relation to restriction of new accesses off regional roads.
- The proposed development is not connected to the Rural Cluster through a comprehensive network of pedestrian and cycleways.
- Chapter 2 of the county development plan contains a clear recommendation that future residential development in Skerries should be managed through a Masterplan planning process.
- No reference is made to the stringent requirements to qualify as a resident in protected enclaves of Rural Clusters.
- The representation of local services within 1km of the site is inaccurate.

3.6.7. The submission includes a map of vehicular, pedestrian and cycle routes within and adjoining the site.

(8) Gerald Horan on the submissions of the Applicant, Fingal County Council and Paul O’Sullivan.

- The Planning Authority has listed many relevant policies and objectives which the development would transgress.
- The Planning Authority has the support of the residents in this Rural Cluster and surrounding farmlands.
- The whole coastal area of south Skerries has been recklessly rezoned to facilitate a failed speculative adventure on lands purchased as agricultural.
- The applicant has misrepresented distances to local facilities and the cycle network.
- The site is highly visible from the R128, South Beach, Red Island and all of the coastline up to the Mourne Mountains.
- It is requested that the Planning Authority’s decision to refuse permission be upheld.

3.6.8. The submission includes part of an ILTP Consulting report on the site access and a map extract of the route to St. Michael’s Special School.

3.7. Planning Authority Response to Recirculated Submissions

3.7.1. The Planning Authority had no further comments to make on the first party and third-party submissions (response documents of 11th June 2024 and 18th June 2024 refer).

4.0 Planning History

4.1. Since the initial Inspector’s report was prepared on this application, the Board has determined the appeal case regarding the inclusion of the site on the map of the Residential Zoned Land Tax in accordance with Section 653J of the Taxes Consolidation Act, 1997 (as amended) - ABP Ref. 318739-23 refers.

4.2. For the avoidance of doubt, I would note that the determination in this case does not infer the favourable consideration of any subsequent planning application for residential development on the subject site, which must be adjudicated against all relevant planning policies, objectives and development standards.

5.0 Assessment

- 5.1. The Fingal Development Plan 2023-2029 and the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024) were adopted / published at the time the original Inspector's report was prepared on this appeal case. As such, the proposed development was assessed against the relevant policies, objectives and development managements standards contained therein. Based on the foregoing, a recommendation to refuse permission for the proposed development was made based on 2 no. reasons and considerations.
- 5.2. I have reviewed and considered the submissions made to the Board in response to the Section 137 notice issued on 22nd April 2024. All the third parties except one are opposed to the development. Fingal County Council requests that the decision to refuse permission be upheld by the Board. The applicant submits that the proposed development complies with the relevant provisions of the Fingal Development Plan 2023-2029 and the Sustainable Residential and Compact Settlement Guidelines for Planning Authorities, 2024 and as such, the Board should grant permission for the proposed development. In my opinion, no material considerations have been raised in the submissions which would alter my original assessment of this case.
- 5.3. Notwithstanding the foregoing, as identified in Section 7.5.1 of the original Inspector's report, the proposed development provides no unit mix, with all the dwellings having 4 no. bedrooms. Section 14.6.2 of the development plan requires new developments to include a mix of house types and sizes to provide variety to a range of households.
- 5.4. The applicant addresses this issue on page 13 of the submission received by the Board on 20th May 2024 and page 7 of the submission received on 12th June 2024. It is stated that this bespoke scheme is tailored to 'upsizers' who would typically be moving from smaller starter homes to larger family homes. While all the units have 4-bedrooms, it is considered that the scheme should be read in tandem with the range of housing surrounding the site which have 2-5 bedrooms. It is also noted that many new housing schemes on larger sites in Skerries are coming on stream which offer a range of houses and apartments that will serve a very different market to the current proposal. It is also stated that 8 no. house types are provided to ensure an

appropriate variety and that the proposal accords with the character of the area and local housing need.

- 5.5. In my opinion, the applicant's rationale in relation to unit mix suggests that this requirement does not apply to the appeal site as the development is being targeted at a particular section of the housing market. The applicant also suggests that other residential schemes in Skerries are satisfying this requirement. In my opinion, there is no development plan provision which would allow the proposed development to be adjudicated on this basis. The development is solely comprised of 4-bedroom dwellings and notwithstanding the 8 no. unit types, does not provide a mix of units and as such, does not comply with the requirements of Section 14.6.2 of the development plan.
- 5.6. Given that the applicant, the Planning Authority and third parties have had the opportunity to respond to this issue, the Board may wish to consider including an additional refusal reason in relation to this matter in the event it is decided to refuse permission for the proposed development (reason 7.3 below refers).
- 5.7. Several of the third parties have raised concerns in relation to the proposed site access onto the R128 regional road. During my inspection, I noted that sightlines are restricted in a northerly direction at the site entrance and that there is a double white line in place at this location. The Transport Department of Fingal County Council also noted that the northerly sightline is restricted by the existing trees and hedgerow foliage and does not comply with DMURS or TII DEN-GEO-03031 (90 m). The Transport Department recommended that further information be requested in relation to a number of items, including the carrying out of an ATC speed survey over a week to determine if visibility of 63 m is sufficient for ambient traffic speeds on the road.
- 5.8. This issue was considered in the applicant's appeal submission, which states that DMURS standards require a sightline of 65 m where this is a bus route along a public road. The applicant notes that the existing hedgerow to the north appears to be cut back to facilitate sightlines and can be trimmed back in the event they become overgrown. I further note with reference to the applicant's Site Location Map (Drawing No. PL-1001) that the lands on which the adjoining hedgerow is located is not under the applicant's control, and as such, I would query the ability to ensure the maintenance of the adjoining hedgerow. Notwithstanding the foregoing, given the

substantive considerations arising in this case in relation to sequential development and the landscape designations which apply to the site, I do not recommend including the proposed site access arrangements as a refusal reason in this instance.

6.0 Recommendation

- 6.1. I recommend that planning permission be refused for the proposed development based on the reasons and considerations set out hereunder.

7.0 Reasons and Considerations

- 7.1. The strategy for the development of towns such as Skerries, as set out in the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024), is to support consolidation within and close to the existing built-up footprint, through the delivery of sequential and sustainable urban extensions. The development of this greenfield site, which is located in a rural area approx. 2km from the town centre of Skerries, with insufficient services and facilities to support future occupants of the proposed residential scheme, would be contrary to these Guidelines and to Policy CSP4 of the Fingal Development Plan 2023-2029 regarding sequential development and Policy CSP34 and Policy CSP36 of the development plan regarding consolidated, compact growth in Self-Sustaining Towns. Thus, the proposed development would be contrary to the proper planning and sustainable development of the area.
- 7.2. Having regard to the scale and massing of the proposed residential dwellings on a greenfield site in a rural, coastal area designated as a Highly Sensitive Landscape with exceptional landscape value, it is considered that the proposed development would seriously injure the visual amenities and landscape character of the area and would be contrary to Policy GINHP25 and Objectives GINHO58 and GINHO59 of the Fingal Development Plan 2023-2029 which seek, inter alia, to protect the character and value of sensitive landscapes. As such, the proposed development would be contrary to the proper planning and sustainable development of the area.

- 7.3. The proposed development is comprised entirely of 4-bedroom dwellings, and as such, does not provide a mix of units to cater for a variety of future occupants. Thus, the proposed development does not comply with the requirements of Section 14.6.2 of the Fingal Development Plan 2023-2029 and would 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.

Louise Treacy
Senior Planning Inspector

9th July 2024