



An
Bord
Pleanála

Inspector's Report

ABP-314031-22

Development

Permission for the replacement of the existing illuminated static advertising display with a digital advertising display on the gable wall of no. 40 Lower Kevin Street, Dublin 8 (Protected Structure), including all associated site works and services, and to permanently decommission and remove 2 no. advertising displays at Lucan Road, Chapelizod, Dublin 20.

Location

40 Lower Kevin Street, Dublin 8.

Planning Authority

Dublin City Council

Planning Authority Reg. Ref.

3769/22

Applicant

JC Decaux

Type of Application

Permission

Planning Authority Decision

Refuse Permission

Type of Appeal

First Party v Refusal

Appellant

JC Decaux

Observer

Lynn Boylan

Date of Site Inspection

9th September 2023

Inspector

Ian Campbell

1.0 Site Location and Description

- 1.1. The appeal property is located on the northern side of Kevin Street Lower and comprises a three-bay, two storey over basement, neo-classical style building, a former Moravian church and school. The building appears to be used as an office. A static illuminated sign is affixed to the side/western gable.
- 1.2. The appeal site is located in the centre of Dublin City and adjoining land uses comprises commercial, retail, education, and residential uses. A Dublin Bike station is situated adjacent/west of the appeal property on a triangular area of hard standing. Bishop Street Flats are located adjacent/north-west of the appeal property. The site of the Kevin Street TU campus is located on the opposite side of the road.

2.0 Proposed Development

- 2.1. The proposed development comprises;
 - the replacement of the existing illuminated static advertising display (6.29 metres W x 6.64m H) with a digital advertising display (5.64 metres W x 5.75 metres H) with a display area of 5.44 metres x 5.44 metres) on the gable wall of 40 Lower Kevin Street, Dublin 8.
 - associated site works and services.
 - permanently decommission and remove 2 no. advertising displays at Lucan Road, Chapelizod, Dublin 20.
- 2.2. The planning application was accompanied by the following;

Conservation Method Statement (prepared by Anello Architects). The statement notes that the proposal is neater than the existing advertising display and has less fixings; that the proposal is a modernisation of the existing display; that the proposal is digital and will not require the replacement of posters; that the proposal is reversible and can be removed in the future. The report concludes that;

 - the urban presence and significance of the Protected Structure's brick gable will be strengthened, modernised and improved by the upgrading of the advertising display to a digital one.

- the continued presence of an advertising display on the gable of the Protected Structure projects it onto the public realm and starkly differentiates it from the adjacent rhythm of the 3 exposed gables of the poor architectural quality corporation flats.
- the proposed upgrading of the advertising display to a digital one remains a reversible intervention and therefore does not impact structurally or physically on the integrity of the Protected Structure.
- the works are a well-thought proposal if carried out with best conservation practice, and the continued use of non-damaging fixings is recommended. The proposal represents a rather minimal variation to the integrity and outlook for the Protected Structure and its environs that strengthens its role in the wider community and urban scape.

Advertising and Lighting Analysis (prepared by High Res). The report is based on a virtual study of the affected area. The report compares a 'right sided viewing screen' verses a standard screen at a number of levels screen brightness. The analysis indicates that right sided viewing results in a reduction in light spill to the Bishop Street Flats.

2.3. Planning Report (prepared by Mac Cabe Durney Barns). The reports sets out the planning rationale for the proposal. Key points include that;

- the proposal will improve the quality of the advertising display at this location and enhance the appearance of the gable wall;
- the proposal addresses the previous reason for refusal under PA. Ref. 3198/20 by providing for the removal of advertising displays at Lucan Road, Chapelizod, a reduced scale, and prevention of light spill towards the Bishop Street flats;
- the area is dark and unwelcoming at night;
- permission has recently been granted for the regeneration of the Kevin Street TU campus adjacent to the appeal property and the permitted building includes a glass façade which will be internally illuminated at night, this development also transforms the area. Relative to the redevelopment of the Kevin Street TU campus the proposal will not have a significant adverse impact on the Protected Structure;

- the digital display will change remotely at 10 second intervals with smooth transition;
- the removal of 2 no. advertising signs at Lucan Road is a significant planning gain;
- examples of permissions granted for advertising structures cited;
- the proposal comprises the replacement of an advertising structure which is established on the site and a development which is compatible with the Z5 zoning objective;
- the proposal will not impede pedestrian movement or the roadway;
- the proposal is highly efficient in terms of energy consumption;
- the proposal replaces a larger sign;
- the proposal enhances presentation to the public realm;
- luminance levels are appropriate for the location having regard to UK guidance (*Professional Lighting Guide 05 – PLG05*) and a condition could be attached to control maximum luminance; and,
- the proposal will not have a detrimental impact upon the built or natural environments.

3.0 Planning Authority Decision

3.1. Decision

The Planning Authority issued a Notification of Decision to Refuse Permission on the 10th June 2022 for 2 no. reasons which can be summarised as follows;

1. The increased luminosity of the signage and frequency of advertisement change represents an intensification of use on the site, would have a significant adverse impact on adjoining residential amenity, would result in visual clutter and would have a negative visual impact on the character of the street.
2. The proposed LED advertisement structure, by reason of its excessive scale and proportions, appearance and location on the façade of this Protected Structure, would have an adverse visual impact on and would seriously detract

from and injure the special architectural character and legibility of both the Protected Structure and its setting. The proposed development would be contrary to Policy 11.1.5.1 (a), (b), and (d) of the Dublin City Council Development Plan 2016-2022.

3.2. Planning Authority Reports

3.2.1. Planning Report

The report of the Planning Officer includes the following comments;

- The surrounding area is predominantly residential. The site is immediately adjoined to the north-west by the Bishop Street Flat complex. Iveagh Trust Flat complex is directly opposite, albeit at a distance of approximately 100 metres. Having regard to the previous refusal issued under Reg. Ref. 3198/20 and the current proposal, serious concerns remain regarding the proximity of the advertising display to existing residential development. It is noted that the Bishop Street Flats are most affected by the proposal being as close as 10 metres from the advertising structure. It is considered that the increased luminosity of the signage and frequency of advertisement change is an intensification of use on the site which would have a significantly negative impact on the residential amenities of the existing residents.
- Given the prominent location of the site, the proposal would have a negative impact on the public realm in terms of visual clutter and therefore have a negative impact on the streetscape. The scale of the advertising structure, illumination of the signage and the associated usage of digital display panelling will increase its visual presence within short and longer range views thus increasing the visual impact of the proposed advertising structure on the street.

The report of the Planning Officer recommends a refusal of permission consistent with the Notification of Decision which issued.

3.2.2. Other Technical Reports

Drainage Division: no objection subject to standard condition.

Conservation Section: notes – that;

- the proposed LED sign is highly visually intrusive and incongruous to the special architectural character of the Protected Structure;
- the proposed LED display would conceal a large portion of the Protected Structure;
- the placement of any advertising screens, banners or signs of this nature on the façade of the Protected Structure is wholly inappropriate and would cause serious injury to the special architectural character and legibility of the Protected Structure as well as having a serious negative impact on its presentation and setting;
- LED installations dominate and overpower the historic environment;
- the data cabinet mounted at high level and an ESB metering unit at low level are visually obtrusive;
- the proposal will also have a negative impact on the iconic ‘gull-wing’ Bishop Street Flats designed by Daithí Hanly, c.1966 and the Kevin Street Library built 1903 to designs by C.J. McCarthy (NIAH Ref:50110035); and,
- no details have been submitted regarding the repointing of the façade.

Transportation Planning Division – no objection subject to conditions.

3.3. Prescribed Bodies

Transport Infrastructure Ireland (TII) – notes that the proposed development falls within the area for an adopted Section 49 Supplementary Development Contribution Scheme (Luas Cross City, St. Stephen’s Green to Broombridge Line).

3.4. Third Party Observations

The Planning Officer’s report refers to 2 no. observations having been received in relation to the planning application. The report of the Planning Officer provides a summary of the main issues raised in the third-party observations, which are as follows;

- The proposal is adjacent to residential development and a children's play area and will have a negative impact on residential amenity. The area is not suitable for the advertisement structure.
- The proposal will result in light pollution.
- The proposal is a danger to traffic.
- The proposal will have a negative impact on the Protected Structure. The conservation method statement is inadequate.
- The proposal to decommission an advertising panel on the Lucan Road should not be accepted as it is not a city centre location comparable to the Kevin Street location.
- Proliferation of advertising display in the vicinity. The proposal will have a negative impact on the character of the area.
- The addition of the proposed ESB metering unit and data cabinet will clutter the area and have a negative impact on the Protected Structure.

4.0 Planning History

Appeal Site (relevant and recent)

PA. Ref. 3198/20 – Permission REFUSED for the replacement of the existing illuminated static advertising display (6m wide x 6m high) with a digital advertising display (6.44m wide x 6.876m high) on the gable wall of 40, Lower Kevin Street, Dublin 8 including all associated site works and services and to permanently decommission and remove 3 no. 48 sheet advertising displays at Western Way, beside the junction with Dominick Street Upper, Dublin 7.

Permission was refused on the basis that the advertisement hoarding proposed for removal would not represent a sufficient planning gain with regard to the rationalisation of external media advertising within the public realm; that the proposal would have a significant impact on the character and integrity of No. 40 Lower Kevin Street, and that owing to the increased luminosity of the signage, frequency of advertisement change, intensification of this type of use on the site and the associated impacts on the residential amenities of adjoining properties, the proposed digital advertisement is considered to be visually inappropriate.

5.0 Policy Context

5.1. Development Plan

5.1.1. The proposed development was considered by the Planning Authority under the Dublin City Development Plan 2016-2022 however the Dublin City Development Plan 2022-2028 came into effect on the 14th December 2022 and is now the relevant development plan.

5.1.2. The appeal site is zoned 'Z5' (see Map E) under the Dublin City Development Plan 2022-2028, the zoning objective of which is *'to consolidate and facilitate the development of the central area, and to identify, reinforce, strengthen and protect its civic design character and dignity'*

5.1.3. The appeal property, 40 Lower Kevin Street, is a Protected Structure (RPS Ref. 4185).

5.1.4. The provisions of the Dublin City Development Plan 2022 - 2028 relevant to this assessment are as follows:

Volume 1:

- Chapter 7 (Objective CCUV45) – Advertisement Structures
- Chapter 11 (Policy BHA2) – Protected Structures

Volume 2: (Appendix 17)

- Section 1.0 – Advertising and Signage
- Section 2.0 – Digital Signage
- Section 8.0 – Advertising Development Management Standards

5.2. **Natural Heritage Designations**

The appeal site is not located within or close to any European Site.

5.3. EIA Screening

The proposed development does not fall within a class of development set out in Part 1 or Part 2 of Schedule 5 of the Planning and Development Regulations, 2001, (as amended), and therefore is not subject to EIA requirements.

6.0 The Appeal

6.1. Grounds of Appeal

This is a first-party appeal against the decision to refuse permission. The grounds for appeal can be summarised as following;

- The proposal improves the presentation display and the quality of light onto the public space at this location.
- Dublin City Council have ignored the lighting report submitted, and the technical analysis it contains. The proposal results in no light spill to adjacent residential properties. The new proposal uses 'right-viewing screen' to mitigate light spill to the adjacent Bishop Street Flats. Luminance levels are appropriate for the location having regard to UK guidance (*Professional Lighting Guide 05 – PLG05*) and a condition could be attached to control maximum luminance. A supplementary report from Peter Canning (High Res Lighting) is provided stating that increased luminosity can be managed with LED technology; that the frequency of advertising changing can be managed by the media playback manager, and adding a soft transition would reduce contrast difference; and the screen system would have shaders to reduce light spill.
- The gable wall of No. 40 Lower Kevin Street was not designed as a public elevation, only being revealed following an urban renewal scheme in the 1960's, and as such the Conservation Officer does not recognise the historical context of the site. The form, features and fabric of the Protected Structure is more applicable to the street rather than a structural gable.
- A supplementary report from Paul Keenan, Conservation Architect is submitted with the appeal submission and states that, historically the gable

was not visible, being a party wall abutment to buildings that have been demolished, and that the historical context of the Protected Structure is its stone façade frontage, and not the brick gable/party; that the demolition of the original street frontage has determined the setting of No 40 Lower Kevin Street and the neighbouring flats are an inappropriate urban response, and more so in respect of the impact on the setting of the Protected Structure, by exposing the gable which was not intended (or designed) to be seen; and that the outcome of the misguided traffic policies of the late 20th Century in aligning Upper and Lower Kevin Street formed a wide avenue and junction, resulting in a left over triangle of hard landscaped including the remnants of the gable wall.

- The scale and proportion of the display is established at this location.
- The area is rapidly changing with reference to the redevelopment of the Kevin Street TU campus adjacent to the appeal property. This redevelopment includes glass curtain walls which will bear down on the library building and will dominate the relationship with Kevin Street and the Bishop Street Flats. The visual impact of the proposal is negligible in the context of this redevelopment.
- Bishop Street Flats are not a Protected Structure.
- There is planning precedent for LED/digital signage on Protected Structures (see PA. Ref. 4633/17 (Bridge over North Strand Road) and PA. Ref. 4639/17 and ABP. Ref. 301260-18). Appendix A of appeal submission includes precedent cases for digital signs.
- To address the previous refusal under PA. Ref. 3198/20 the sign was reduced in size and provides for the decommissioning of 2 no. existing signs at Lucan Road, Chapelizod.
- The proposal would not result in a significant impact on the Protected Structure compared to the existing sign.
- The existing sign will remain in place under the Planning Authorities decision. The development would be a continuation of an established use and not a *de nova* departure from anything else.

- The proposal covers a consistent area of the gable and does not negatively change the relationship of the display to the wall. The proposal provided a contrast between quality modern materials and the traditional fabric of the adjoining building.
- The proposal accords with the policies of the Dublin City Development Plan 2016-2022 (i.e. SC22, SC23, Section 4.5.6 and Section 19.3).
- The area has capacity to absorb the proposal. The proposal does not obstruct or endanger pedestrians or road users.
- The proposal is energy efficient.
- The Planning Authority have erroneously described the sign as an LED display instead of a digital display.

6.2. Planning Authority Response

None received.

6.3. Observations

An observation from Senator Lynn Boylan and was received in respect of the appeal. Issues raised in the observation may be summarised as follows:

- the applicant notes that the area to the front of the proposed sign is dark however this would be better addressed through street lighting.
- the proposal is at odds with good public realm.
- the proposal represents a diminished planning gain in terms of the number of signs being decommissioned, as under PA. Ref. 3198/20 the applicant was proposing to decommission 3 no. signs.
- the applicant has not addressed the previous reason for refusal in terms of impact on the Protected Structure.
- the applicant has not demonstrated that the existing sign has planning permission. The sign has evaded enforcement.

- being 'open for consideration' is tempered by caveats in Appendix 19 of the Development Plan.
- the luminance proposed is 300 candelas per sqm however the report stipulated that the maximum should not exceed 250.
- the efficiency of the proposal is not demonstrated.
- there is ambiguity in the information submitted in relation to whether the sign is LED or digital. The applicant states that the sign is not LED but the report from High Res refers to the sign as LED.
- the applicant appears to contend that only the street facing part of the building is worthy of conservation as the gable was previously obscured.
- the proposal would have a negative impact of Kevin Street Library, a Protected Structure.

7.0 Assessment

7.1. I consider the main issues in the assessment of this appeal are as follows:

- Impact on Residential Amenity
- Impact on Visual Amenity
- Impact on Protected Structure
- Appropriate Assessment.

7.2. Impact on Residential Amenity

7.2.1. The first reason for refusal includes reference to the impact of the proposed sign on the amenity of adjacent residences arising from the increase in luminosity and the frequency of advertising change. In response, the appellant states that the new proposal uses 'right-viewing screen' to mitigate light spill to the adjacent Bishop Street Flats, that luminance levels are appropriate for the location, and that a condition could be attached to control maximum luminance.

7.2.2. At the closest point the proposed sign will be located c. 10 metres from Bishop Street Flats. In addition to living areas facing onto the location of the proposed sign I also note that balconies/terraces serving units within Bishop Street Flats also face onto the

proposed sign. Whilst the lighting report submitted by the appellant indicates that the method of lighting will not result in any light spill towards Bishop Street Flats, it remains that the residences in Bishop Street Flats will face onto a digital sign in close proximity to windows and balconies/terraces. In my opinion, irrespective of whether the extent of illumination from the proposed sign reaches the façade of Bishop Street Flats, the impact of a digital sign with a display area of c. 30 sqm with changing imagery in proximity to residences would be seriously injurious to the residential amenity of the Bishop Street Flats, and on this basis I recommend that permission is refused.

7.3. Impact on Visual Amenity

- 7.3.1. The Planning Authorities first refusal reason notes that the proposed development would result in visual clutter and would have a negative visual impact on the character of the street. The appellant contends that the replacement sign provides for an improved display; that the proposal will provide light to an area of the street which is dark and unwelcoming; and that relative to the redevelopment of Kevin Street TU the visual impact of the proposal would be negligible.
- 7.3.2. The Dublin City Development Plan 2022-2028 divides the City into different zones for the purpose of signage, which are indicated at Figure 1 (Appendix 17). The appeal property is not readily identifiable on this map given its scale however based on the identifiable locations on the map and the nature of the area and the descriptions of the various zones the appeal property appears to be located within Area 2, described as 'a zone of significant urban quality with retail/commercial uses, where special controls apply to advertising in the street'.
- 7.3.3. Section 1.0 of Appendix 17 of the Dublin City Development Plan 2022-2028 requires that replacement advertising signage will only be permitted if agreement is made to decommission at least one other display panel in the city. In this regard I note that the applicant is proposing to decommission 2 no. signs which are located at Lucan Road, Chapelizod and as such the proposal accords with the Development Plan policy in respect of rationalisation of signage within the City.
- 7.3.4. Section 2.0 of Appendix 17 of the Dublin City Development Plan 2022-2028 sets out policy requirements in respect of digital signage, specifically that the maximum

luminance is 300 candelas per sqm; that only static images are permitted; that images change at a frequency not less than once every 10 seconds; and, that the image change is via fade transition. Should the Board be minded to permit the proposed development I consider that these requirements can be addressed by planning condition, and I note that the appeal submission indicates that the display can be controlled in this way.

- 7.3.5. Section 7.0 of Appendix 17 of the Dublin City Development Plan 2022-2028 sets out the strategy in respect of signage, including the key considerations for the assessment of advertising signage, which includes the surroundings and features of the buildings on which they are to be displayed, the size of the signage, and the potential for the creation of visual clutter. Section 7.0 also provides that non-essential advertising structures, or any advertising structures which would impact injuriously on amenity, the built environment or road safety will be restricted.
- 7.3.6. Section 8.0 of Appendix 17 of the Dublin City Development Plan 2022-2028 sets out development management standards for advertising signage which includes, the design/materials of the advertising panel; the scale of the signage relative to the buildings; structures and streets in which it is to be located; the impact of the signage on the character of the street and the amenities of adjoining properties; and the impact on the character and integrity of Protected Structures.
- 7.3.7. The proposal entails an advertising sign with a digital display area of c. 30 sqm. Due to the alignment of Lower Kevin Street at this particular location, the proposal to utilise a significant area of the gable wall of the appeal property, and the digital nature of the sign, which allows for views of the sign over a greater distance, the side gable and proposed sign will be particularly prominent. In my opinion the proposed sign would form a dominant and discordant feature at this part of Lower Kevin Street, and on the approach to the appeal property, would result in visual clutter, significantly detracting from the character of the area, and would be contrary to the Advertising and Signage Strategy as set out in Appendix 17 of the Dublin City Development Plan 2022-2028, which requires that in assessing proposals for signage the impact on the character of the street and the amenities of adjoining properties be considered, and that advertising

structures which would impact injuriously on amenity will be restricted. I therefore recommend that permission is refused.

7.4. Impact on Protected Structure

- 7.4.1. The second refusal reason cited by the Planning Authority relates to the impact of the proposed sign on the character, legibility and setting of the Protected Structure having regard to its appearance, excessive scale and proportions.
- 7.4.2. From reviewing the documentation submitted with the planning application/appeal I note that there is some ambiguity in relation to the nature of the sign proposed. The appeal submission states that the sign is 'digital' and not 'LED', whereas the lighting report which is submitted with the appeal submission refers to 'LED screen technology'. I note that the development description contained in the public notices refers to the proposed sign as being 'digital' and on this basis I have considered the proposal as such. I further note that the policy contained in the Dublin City Development Plan 2022-2028 relates to digital signage and does not differentiate between LED and digital signage.
- 7.4.3. The crux of the appeal, as it relates to the impact of the proposal on the Protected Structure, is that the gable wall of 40 Lower Kevin Street was not originally designed to be visible, and only became so when a terrace of buildings were demolished to facilitate the construction of Bishop Street Flats around the 1960's, that the sign is appropriate in terms of its scale and design, and that relative to the redevelopment of Kevin Street TU the visual impact of the proposal would be negligible.
- 7.4.4. I note that the side gable of the appeal property, irrespective of whether it was designed to be visible, now forms a prominent elevation in the locality and whilst the gable elevation is not ornate, as is the case with the front elevation, it clearly forms part of the building. Objective BHA2 (b) of the Dublin City Development Plan 2022-2028 seeks to protect structures included on the RPS from any works that would negatively impact their special character and appearance. Having regard to the size of the sign relative to the gable, and to its digital nature, which will render the sign highly conspicuous, I consider that the proposal would dominate the Protected Structure (i.e. 40 Lower Kevin Street), affecting the legibility of the structure, and would

also be incongruous with its architectural character. Regarding the redevelopment of the Kevin Street TU site adjacent, whilst I acknowledge that glazed elevations will be illuminated from inside I consider that the proposal, which relates to an elevation of 40 Lower Kevin Street, would have a much greater and more direct impact on the structure than development in the vicinity, which will be viewed in the context of the redevelopment of an entire site. Having regard to the forgoing I consider that the proposed development would materially and adversely affect the character of 40 Lower Kevin Street, and would therefore conflict with Objective BHA2 (b) of the Dublin City Development Plan 2022-2028. On this basis the proposed development should be refused.

7.5. Issue Arising

7.5.1. Planning Status of Existing Sign

The appellant refers to the existing sign as established. From reviewing the planning history relating to the appeal property I note that the planning status of the existing sign is unclear. In my opinion the planning status of the existing sign is outside the scope of this appeal and I note that issues of enforcement are matters for the Planning Authority and not the Board.

7.5.2. Precedent

The appellant's appeal submission refers to examples where similar developments have been permitted. I note that these precedent decisions relate to digital signage, including proposals for digital signage on Protected Structures located within Dublin City. In my view it would be inappropriate to draw any conclusions from the decisions of Dublin City Council or An Bord Pleanála in respect of previous applications which do not relate to the subject site and its surroundings. The application before the Board should be determined in relation to the particular set of circumstances pertaining to the site and its surroundings and to the policy and provisions set out in the Dublin City Development Plan 2022-2028.

7.5.3. Development Contributions

Having reviewed the adopted Dublin City Council Development Contribution Scheme 2023 I note that the scheme does not provide any exemption for development of the nature proposed. On this basis I consider that development contributions apply to the proposed development and should the Board grant permission for the proposed development a condition requiring same should be attached. In addition, the location of the proposed development is within the area for an adopted Section 49 Supplementary Development Contribution Scheme (Luas Cross City, St. Stephen's Green to Broombridge Line) and should the Board grant permission for the proposed development a condition requiring a contribution toward this scheme should be attached.

7.6. **Appropriate Assessment**

- 7.6.1. Having regard to the nature and limited scale of the proposed development, the developed nature of the landscape between the site and European sites and the lack of a hydrological or other pathway between the site and European sites, it is considered that no Appropriate Assessment issues arise and that the proposed development would not be likely to have a significant effect either individually or in combination with other plans or projects on any European site.

8.0 **Recommendation**

- 9.0 Having regard to the above it is recommended that planning permission be refused for the proposed development based on the following reasons and considerations.

10.0 **Reasons and Considerations**

1. It is considered that the proposed development, comprising a digital sign in proximity to windows and balcony/terraces within Bishop Street Flats would seriously injure the residential amenities and depreciate the value of the

adjoining property and would be contrary to the proper planning and sustainable development of the area.

2. It is the policy of Dublin City Council as set out in Policy BHA2 of the Dublin City Development Plan 2022-2028 to protect structures included on the RPS from any works that would negatively impact their special character and appearance. It is considered that the proposed signage would dominate 40 Lower Kevin Street, affecting the legibility of the structure, would be incongruous with its architectural character and would therefore contravene Objective BHA2 of the Dublin City Development Plan 2022-2028. Additionally, having regard to the Advertising and Signage Strategy as set out in Appendix 17 of the Dublin City Development Plan 2022--2028 it is considered that the proposed sign would be visually obtrusive, and would seriously detract from the character and visual amenity of the area. 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 Campbell
Planning Inspector

10th September 2023