



An
Bord
Pleanála

Inspector's Report

ABP-314349-22

Development	Construction of 26 houses and associated site works. Units will replace 4 residential units previously permitted under Cork County Council Ref.13/4528, extended under Ref.18/7090
Location	Farnahoe (townland), Innishannon, Co. Cork.
Planning Authority	Cork County Council
Planning Authority Reg. Ref.	21/6053
Applicant(s)	Dzeko Limited
Type of Application	Permission
Planning Authority Decision	Refuse
Type of Appeal	First Party
Appellant(s)	Dzeko Limited
Observer(s)	23 no.
Date of Site Inspection	19 July 2023

Inspector

Cáit Ryan

1.0 Site Location and Description

1.1. The site is located within the development boundary of Innishannon, County Cork, approximately 18km south east of Cork City. The site fronts onto the narrow road, Bothar na Sop. This road is accessed from the N71 approach road to Innishannon from the north (from Cork City), and also from the junction with N71/Main Street to the south, near the entrance to the Innishannon village.

The site area is 1.65ha, and largely comprises the south-eastern part of a large field. The subject site is roughly diamond-shaped, and includes a narrow strip of land extending approximately 70m along Bothar na Sop roadside frontage, to the south-west, towards the pedestrian access to Roselawn estate.

The site is bounded:

- To the northwest by the field of which the site forms a part.
- To the north-east by a strip of land approximately 15m wide, and which widens to approximately 42m along the roadside frontage. This strip of land includes the gate to the overall field and overgrown ruins of a small former stone building. Two houses are located to the north-east of this strip of land, one of which fronts onto Bothar na Sop, and one of which is in a backland location.
- To the south east by its roadside frontage to Bothar na Sop, which comprises a substantial hedgerow and some trees. Detached dwelling houses are located on the opposite side of Bothar na Sop. There is an agricultural building on the southeastern side of the road, approximately opposite the field entrance.
- To the south-west by No. 27 Roselawn, and an area of undeveloped land cordoned off from the open space area within the Roselawn residential development.

There is a significant change in ground levels across the site, whereby the site slopes downwards from north west to south east. Lands to the north east of the subject site are more elevated, and bound residential properties which front onto Cork Road (L-2037). ESB wires traverse part of the site.

- 1.2. The site is within the 50kph speed limit. In the wider area, local road L-2037, described both as Cork Road and Church Hill, connects to the N71/Main Street at the signalised T-junction. This road is located a short distance to the west of the site, and vehicular access to Roselawn estate is from this road.

2.0 Proposed Development

- 2.1. Planning permission is sought for the construction of 26 no. dwelling houses and all associated site development works including access, footpaths including a new footpath along the L-6067-0, parking, drainage, landscaping and amenity areas.

The description of development as per the public notices states that the proposed dwelling units will replace 4 no. residential units previously permitted along the south east boundary of the site under Cork County Council Ref. 13/4528 (Extended under Ref. 18/7090), at Farnahoe (townland), Innishannon, Co. Cork.

The Further Information submission includes a revised site layout, and the number of proposed dwelling houses is reduced to 25.

- 2.2. Documentation submitted with the application includes a letter of consent from Property Section of Cork County Council, dated 15 July 2021. The letter confirms the Council's consent to the making of an application for planning permission which includes works affecting the public road in the charge of the Council, as delineated on attached map. It states that any potential disposal of these lands will be subject to the consents and procedures required under Section 183 of the Local Government Act, 2001. The letter also states that consent should be obtained from any other affected landowners.

The Ownership Site Plan compiled by the applicant's architect shows 'Plot Owner B'. This comprises of a narrow strip of land, outlined in light green colour, which is annotated as 'Portion of Roselawn housing estate taken in charge by county council'.

- 2.3. Two no. further separate letters of consent are on file. These are from (1) the landowner of part of the narrow stretch of land to the southwest of the main residential area of the site, submitted with planning application originally lodged and

(2) the landowner of lands directly to the northeast of the site, which was submitted as Further Information.

3.0 Planning Authority Decision

3.1. Decision

The planning authority made a decision to refuse permission for 3 no. reasons on 18 July 2022.

The 3 no. reasons are as follows:

1. The proposed development would endanger public safety by reason of traffic hazard as the proposed additional traffic in conjunction with existing traffic movements associated with access to private property and other through traffic, would create circumstances whereby pedestrians and cyclists from the proposed development share a very narrow local road 'Bothar na Sop' of insufficient width and lacking in pedestrian connectivity between the edge of the application site and the junction with the N71/Main Street, to gain direct access to village facilities and services, therefore endangering public safety for non-road users, contrary to the proper planning and sustainable development of the area.
2. The proposals within the planning application site boundary (eg between Roselawn and south-west corner of the proposed residential area) along the Bothar na Sop road are not satisfactory because they do not provide for a minimum 5.5m wide road and 2m wide footpath resulting in poor permeability, accessibility and connectivity for pedestrians, cyclists and vehicle drivers with consequential safety concerns due to a significant length of footpath being substantially less than 2m wide, narrow road width, combined with sudden switch from a 3.5m to 5.5m road width thus conflicting with Policy Objectives HOU 3-1b (Sustainable Residential Communities), TM 2-1c (Walking), and TM 2-2c (Cycling) in the Cork County Development Plan 2014, Policy Objective GO-01(l) of the Bandon-Kinsale Municipal District Local Area Plan 2017, Design Manual for Urban Roads and Streets, and National Guidelines for Planning Authorities on Sustainable Residential Development in Urban

Areas (Cities, Town and Villages) which seek to ensure where feasible, to maximise permeability and extend connections for pedestrians and cyclists to existing streets and roads to the wider area. The proposed development would, therefore, endanger public safety by reason of traffic hazard, particularly in relation to vulnerable road users and would therefore be contrary to the proper planning and sustainable development of the area.

3. Based on the information submitted with this application, the Planning Authority is not satisfied that the full extent of calculated surface water arising from proposed development has been sufficiently addressed and would compound and/or lead to substantial risk of surface water pooling on the public road and running into private property, conflicting with Policy Objective WS 5-1 in the Cork County Development Plan, 2014 and Policy Objective GO-01e LAP in the Bandon-Kinsale Municipal District Local Area Plan, 2017, which seeks to ensure that all new developments make adequate provision for storm water drainage. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.

3.2. Planning Authority Reports

3.2.1. Planning Reports (dated 16 September 2021 and 15 July 2022)

The first Area Planner's report noted the content of technical reports and reports from prescribed bodies, and the matters raised in the third party submissions. The report raised a number of concerns relating to site layout, housing mix, accessibility/traffic, including footpath connectivity and detailing of the roadside boundary, surface water drainage and Part V requirements.

Further Information in relation to 22 no. items was recommended.

The Senior Executive Planner's report dated 17 September 2021 recommended Further Information in relation 20 no. items.

The second Area Planner's report noted the Further Information response received, and concluded that although the site layout had been improved, the integration and connectivity is insufficient. Updated surface water calculations to factor in revised proposals and widening of road frontage were noted to be not

acceptable to local engineer. Refusal of permission for 3 no. reasons was recommended.

The Senior Executive Planner's report dated 15 July 2022 agreed with the recommendation of the Area Planner to refuse permission.

The Senior Planner's report dated 17 July 2022 concurred with the recommendation of the Senior Executive Planner to refuse permission.

3.2.2. Other Technical Reports

3.2.3. **Area Engineer** (dated 16 September 2021 and 12 July 2022)

The first Area Engineer's report seeks Further Information on a number of matters, including -

- Revisions to site layout to allow for the entirety of the greenfield site which requires access on Bothar na Sop and allow for phased developments.
- Seeks provision for minimum 5.5m wide carriageway, at developer's own cost, from the extent of the site adjoining the L-6067-0 to the village junction with N71. Notes that L-6067-0 is a local secondary road, that road widths are approximately 2.7m of road surface by the site, and vary from approximately 3m to 4.5m along Bothar na Sop.
- The set back for sight distances needs to be increased to 2.4m, rather than the 2m shown, and be from road edge.
- Revised proposals for storm water drainage

The second Area Engineer's report

- Noted that P.A. Ref. 21/6811 (then under appeal) required a 2m wide footpath, but as there was no allowance for road widening, there is potentially a link missing on providing a 5.5m wide road.
- Noted that the bollards (at Roselawn) have been in place for approximately 25 years, that the proposal to allow traffic through Roselawn is not acceptable, and the extra traffic through Roselawn would pose an increased safety hazard through the estate. The pedestrian connectivity proposal to the village via Roselawn would require a special contribution to be levied on the provision of

a footpath at this junction. The footpath connectivity proposal is not acceptable with steep gradients on Roselawn.

- Notes the attenuation tank has been designed 1-100 years storm plus 10% for climate change. Requires all calculations outlining that the capacity of the 400m³ storm water attenuation tank is sufficient to be submitted to the roads authority prior to any development if this planning (application) is accepted.
- Required surface water drainage on Bothar na Sop to be addressed to ensure that the extra motorists and pedestrians are able to use this road without flooding and ponding concerns. There has not been a satisfactory reply to the Further Information request to deal with storm water on Bothar na Sop.

Refusal of permission is recommended on grounds relating to extra traffic speed hazard, the absence of safe acceptable pedestrian access, and the necessity for storm water issues in the locus to be satisfactorily dealt with by means of a new storm water pipe network upgrade to an acceptable outfall point.

3.2.4. **Housing Officer** (reports dated 24 August 2021 and 27 June 2022)

The first Housing Officer's report states that the pepperpotting of the Part V units is acceptable. Concern raised that the proposed house types are overly large for use as social housing. Recommends Further Information requiring gross floor area of the social units be reduced by 10%-15% and large wardrobes and en-suites to be removed.

The second Housing Officer's report refers to Further Information submitted and states no objection to a grant of permission.

3.2.5. **Public Lighting** (reports dated 18 August 2021 and 28 June 2022)

The first Public Lighting report notes that no public lighting design was submitted with the application. Further Information was recommended requiring the submission of a public lighting design, which complies with Cork Public Lighting Manual and Product Specification 2021, and design and drawings showing lux contour levels for stated designed minimum lux levels.

The second Public Lighting report states that the Further Information does not answer all requests in public lighting report, and recommends Further Information relating to 8 no. items.

3.2.6. **Estates Report** (reports dated 11 August 2021 and 14 July 2022)

The first Estates Engineer report includes –

- A Flood Risk Assessment is not required.
- Proposal has no regard to any future development of the adjoining lands to the rear (northwest) of the site, other than retention of a strip of land to the side (northeast) of the site. If this layout is permitted, then lands to rear of site are ‘backlands’. Long narrow access road is not attractive entrance, and there would be 2 no. T-junctions serving 2 no. estates in close proximity. Masterplan should be developed for entire field.
- Bothar na Sop accesses onto the N-71-1066 outside the village (100kph speed limit applies) approximately 280m to the north of the site. Concern regarding width of local road. No removal and/or setback of the existing roadside boundary to facilitate localised road widening proposed, other than minor improvement works outside the Roselawn entrance. The proposed footpath width to the front of Roselawn is far too narrow, at 1m wide at its narrowest point.
- No public lighting scheme submitted.
- Surface water drainage proposals are acceptable in principle, subject to approval of Area Roads Engineer.
- Noted that there is restricted access to swales and/or infiltration drains proposed to the rear of some properties. Advises that these swales and/or infiltration should not be taken in charge by the local authority, and seeks alternative measures for the maintenance of this drainage system.
- Comment should be sought from Irish Water as upgrading works to the local public foul sewer network and local public water supply network may be necessary.
- Recommends Further Information based on matters raised in the report.

The second Estates Engineer report -

- Noted that the applicants do not own the adjoining ‘common area’ within the existing Roselawn estate, which would be necessary in order to provide a new

footpath from the Roselawn estate entrance as far as the south-western corner of the site. The 21/6811 development (decision to grant 2 no. houses) is subject to a third-party appeal. There is no certainty that a footpath can or will be provided across this adjoining site. The adjoining green area within the Roselawn estate is not owned by the Council. The estate was taken in charge under Section 180 of the Planning and Development Act 2000, as amended.

- Noted the revised location of the attenuation tank is acceptable.
- Noted that the revised taking in charge layout does not include the open swales/drains at the rear of properties, and that this drainage infrastructure will be managed in perpetuity by a management company. No objection to these proposals.
- States that significant local improvement works would be required to the local road network to cater for a large residential development in this area. Refusal of permission is recommended for 3 no. reasons, relating to endangerment of public safety by reason of traffic hazard.

3.3. Prescribed Bodies

- 3.3.1. **Irish Water/Uisce Éireann** in a letter dated 1 September 2021 stated that the developer had liaised with Irish Water, and that a Confirmation of Feasibility (CoF) had issued. Irish Water have no objection to the proposal subject to the constraints outlined in the CoF and 4 no. conditions. As the applicant proposes to connect to a public water supply/wastewater network operated by IW, it will be necessary to enter into a connection agreement prior to commencement of development. It would, however, be subject to the constraints of the IW Capital Investment Programme.
- 3.3.2. **Inland Fisheries Ireland (IFI)** in a letter dated 16 August 2021 states that as the public sewerage system in Innishannon is currently overloaded, it asks that planning conditions require that the proposed development will not be occupied until such time as the public sewerage facilities are upgraded and fully commissioned, or an alternative method of effluent disposal has been put in place.
- 3.3.3. **Transport Infrastructure Ireland (TII)** in a letter dated 23 August 2021 states that TII will rely on the planning authority to abide by official policy in relation to

development on/affecting national roads as outlined in DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (2012), subject to –

- The proposed development shall be undertaken strictly in accordance with the recommendations of the Transport (Traffic Impact) Assessment, and that any recommendations arising should be incorporated as conditions of the permission, if granted. Any additional works required as a result of the assessment should be funded by the developer.
- TII will entertain no future claims in respect of impacts on the proposed development, if approved.

3.4. Observations to Planning Authority

- 3.4.1. 31 no. submissions were received. The issues raised are generally similar to those referenced in the observations on this appeal. These include concerns regarding traffic safety and congestion, storm water run-off and flooding, capacity of public sewer, excessive density and proposal out of character with the area, habitat loss, overlooking and need for masterplan.

4.0 Planning History

Subject Site/Part of Subject Site

P.A. Ref. 13/4528: Permission was granted subject to conditions in 2014 for development comprising the construction of 4 no. dwelling houses including ancillary individual waste water treatment systems, vehicular entrances and all associated site works at Farnahoe, Innishannon. This planning permission has not been implemented. This site comprised 0.67ha, and formed a smaller part of the current appeal site. The 4 no. houses were each to be accessed individually from Bothar na Sop.

P.A. Ref. 18/7090: An extension of duration of planning permission was granted in 2019 for development permitted under P.A. Ref. 13/4528. This extension expires on 22 January 2024.

P.A. Ref. 07/8859 and ABP Ref. PL.04.227397: An Bord Pleanála refused permission in 2008 for 17 no. serviced sites, access road and associated site works for 2 no. reasons relating to

(1) incompatibility with prevailing density and character of the residential development in the vicinity, and proposed retaining wall along Bothar na Sop road frontage would constitute an uncharacteristic and visually obtrusive feature which would seriously injure the amenities of the area;

(2) the Board was not satisfied that a satisfactory effluent treatment and disposal system could be provided, and the proposal would therefore be prejudicial to public health. Proposal would be premature by reference to an existing deficiency in the provision of public sewerage facilities and the period in which the constraints involved may be reasonably expected to cease.

This site is largely the same as the current appeal site, but did not include the narrow strip of land along the roadside frontage of the Roselawn estate.

On nearby sites

P.A. Ref. 21/6811: Permission granted subject to conditions in 2022 to construct 2 no. dwellings, and all associated site works, at Roselawn, Farnahoe, Innishannon. This site adjoins the south western boundary of the current appeal site. Both proposed houses are accessed from a cul de sac within the Roselawn estate. No access was proposed from Bothar na Sop. Condition 12 of the planning permission states:

The Bothar Na Sop boundary edge of the development shall be constructed in a position that would allow a 2 metre wide footpath, north of the existing road edge, be constructed in the future.

Reason: To allow for the provision of a footpath on Bothar na Sop in the future.

An appeal (**Ref. ABP-313741-22**) lodged was dismissed by An Bord Pleanála in 2022, whereby the Board determined that it was satisfied that the appeal should not be further considered by it having regard to the nature of the appeal, where the matters raised refer solely to legal matters which were outside the remit of the Board.

P.A. Ref. S/97/3770 and ABP PL 04.105003: Permission was granted in 1998 for development comprising the erection of four bollards to close off the vehicular access from Botharnasup to Roselawn, Farnaroe, Innishannon, subject to 3 no. conditions.

Condition 1 requires that the bollards and associated structures shall be removed on or before the expiration of three years from the date of this order, unless before the end of that period, permission for retention beyond that date shall have been granted. In the event that no further permission being granted, all works associated with the removal of the bollards and associated structures, and the reinstatement of the site, shall be carried out in accordance with the requirements of the planning authority.

The reason for the condition was to enable the effect of the development on the amenities of the area and on traffic safety and convenience to be reviewed having regard to the conditions then prevailing.

Bollards have been erected at the entrance to Roselawn from Bothar na Sop road, approximately 10m north west of the subject site, that is, from the most south westerly part of the narrow stretch of roadside frontage.

5.0 Policy Context

5.1. Development Plan

The current development plan is the Cork County Development Plan 2022-2028, which was adopted on 25 April 2022 and came into effect on 6 June 2022.

Innishannon is a 'Key Village' in the County Development Plan. The population of Innishannon based on Census 2016 is 907, with a population target for 2028 of 1,161. Accordingly, Innishannon is a Key Village <1,500. The net new units required over the current County Development Plan period is 97.

Landscape Character Type for this area is Broad Fertile Lowland Valleys.

The site is located within Flood Zone C.

Volume 1: Main Policy Material

Density:

Section 4.9 Approach to Cork County’s Settlement Hierarchy, includes Objective HOU 4-7 which sets out the density categories in the Plan, and Table 4.1 which sets out the tiered density approach.

Objective HOU 4-7: Housing Density on Residentially Zoned Land includes Medium C as density range of 5-20 units/ha.

Table 4.1: Settlement Density Location Guide outlines ‘Medium C’ (5-20 units/ha) for Key Villages <1,500 & Villages as follows:

Generally applicable for future development on edge of centre sites. Densities up to 30 units/ ha will be considered in Key Villages. Within Key Village and Village Centres higher densities will be considered.

Section 4.9.6 under Density Approach to Villages: Key Villages <1,500 population and all other villages will generally apply the Medium C density category. Proposals will be required to devise a locally tailored design that creates a sense of place by strengthening the street pattern or creating new streets/centres that contribute to the village’s urban structure. The design approach shall normally respect the pattern and grain of existing development in the surrounding area, unless otherwise specified.

Transport and Mobility:

Objective TM 12-2: Active Travel includes

TM12-2-1: Deliver a high level of priority and permeability for walking and cycling to promote accessible, attractive, liveable, vibrant and safe settlements to work, live, shop and engage in community life, within a ten minute walk of one’s home.

Prioritise development in our settlements that is well located and designed to facilitate walking, cycling and public transport trips. Promote equal access for all through the adherence to universal design in the external built environment to facilitate greater use of public transport, walking and cycling, including

a) New development areas will be permeable for walking and cycling, via safe, convenient and enjoyable routes, and the retrospective implementation of walking and cycling facilities shall be undertaken where practicable in existing neighbourhoods, to give competitive advantage to these modes. See DMURS (2020

or later revision) and National Cycle Manual and Permeability Best Practice Guide (NTA) for guidance.

b) All new developments are to be designed to latest DMURS standards, unless precluded by space or other constraints, to be accessible and permeable for pedestrians, cyclists and those of reduced mobility.

TM12-2-2: Promote and facilitate an active travel culture in the County where active travel is a viable choice, including

d) Support the development of a safe, coherent and continuous cycling infrastructure to cater for the needs of all groups of cyclists, especially new cyclists, school children and the elderly and support safe walking and cycle routes particularly in the approach to schools.

Section 12.7.9 states that the plan seeks to create liveable settlements which will promote well-being and will give a competitive advantage over the use of the car.

Section 12.7.10 states that this requires the protection and enhancement of walking routes, in particular routes which provide access to neighbourhood or town centres, public transport, local employment areas, areas of recreation, community facilities, and schools. It requires the creation of safe, convenient and enjoyable routes. New development should be optimally permeable for walking and cycling and opportunities for retrospective implementation of walking and cycling routes should be taken where practical in existing neighbourhoods.

Water Management

Objective WM 11-10: Surface Water, SuDS and Water Sensitive Urban Design

a) Require that all new developments incorporate sustainable drainage systems (SuDS). Efforts should be taken to limit the extent of hard surfacing and impermeable paving.

b) Encourage the application of a Water Sensitive Urban Design approach in the design of new development or other urban interventions. Opportunities to contribute to, protect or re-enforce existing green infrastructure corridors or assets should be maximised.

c) Optimise and maximise the application of Sustainable Urban Drainage Systems (SuDS) to mitigate flood risk, enhance biodiversity, protect and enhance visual and

recreational amenity; all in the most innovative and creative manner appropriate and in accordance with best practices. Proposals should demonstrate that due consideration has been given to nature based solutions in the first instance in arriving at the preferred SuDS solution for any development.

d) Provide adequate storm water infrastructure in order to accommodate the planned levels of growth expected for the County.

e) Where surface water from a development is discharging to a waterbody, appropriate pollution control measures (e.g, hydrocarbon interceptors, silt traps) should be implemented.

f) The capacity and efficiency of the national road network drainage regimes will be safeguarded for national road drainage purposes.

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Section 1.10.9 states that lands within the development boundary to the east of the village along the approach road are sensitive and more elevated in nature and development on these lands should be of a scale in keeping with such a prominent and sensitive location.

Objective DB-02: New development should be sensitively designed and planned to provide for the protection of green infrastructure assets of the village and will only be permitted where it is shown that it is compatible with the requirements of nature conservation directives and with environmental, biodiversity and landscape protection policies as set out in Volume One Main Policy Material and Volume Two Heritage and Amenity.

Special Policy Area X-02: Land to remain predominantly open and rural in character with potential for small scale individual housing. This 1.1ha landbank (stated as 1.22ha on development plan mapping) is located approximately 30m to the east of the subject site, on the opposite side of Bothar na Sop. The X-02 site is bounded by a planted area set back from the N71 on its eastern/south eastern boundary.

Special Policy Area X-091: Land to remain predominantly open and rural in character with potential for small scale individual housing. This landbank is

located on Bothar na Sop, approximately 150m northeast of the subject site, and comprises 2.1ha.

5.2. Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009)

5.2.1. The Guidelines state that in order for small towns and villages to thrive and succeed, their development must strike a balance in meeting the needs and demands of modern life but in a way that is sensitive and responsive to the past. New development should contribute to compact towns and villages and offer alternatives to urban generated housing in unserviced rural areas. The scale should be in proportion to the pattern and grain of existing development. Each residential scheme within a small town or village should be designed to *inter alia* make a positive contribution to its surroundings and provide for effective connectivity, especially by pedestrians and cyclists. In terms of densities, in order to offer an effective alternative to the provision of single houses in surrounding unserviced rural areas, it is appropriate in controlled circumstances to consider proposals for developments with densities of less than 15-20 dwellings per hectare along or inside the edge of smaller towns and villages, as long as such lower density development does not represent more than about 20% of the total new planned housing stock of the small town or village in question.

5.3. Design Manual for Urban Roads and Streets (DMURS) 2013, updated 2019

5.3.1. As outlined in its Introduction, DMURS recognises the importance of assigning higher priority to pedestrians and cyclists, without unduly compromising vehicle movement, in order to create secure, connected places that work for all members of the community. Walking and cycling will improve health and well-being and will provide greater opportunities for interaction which promote neighbourliness and community growth. It states that this Manual focuses on streets as attractive places, whether new or existing, and seeks to encourage designs appropriate to context, character and location that can be used safely and enjoyably by the public. Section 4.3.1 states that with regard to footways, minimum footway widths are based on the space needed for two wheelchair users to pass each other (1.8m). The footway

should be maintained at a consistent width between junctions and should not be narrowed to accommodate turning vehicles.

5.4. **Natural Heritage Designations**

- The nearest Special Area of Conservation is Courtmacsherry Estuary SAC (Site Code 001230), located approximately 11km south of the site.
- The nearest Special Protected Area is Courtmacsherry Bay SPA (Site Code 004219), located approximately 11km south of the site.
- Proposed Natural Heritage Area: Bandon Valley Above Inishannon (Site Code 001740) is approximately 0.6km south of the subject site.

5.5. **EIA Screening**

See completed Form 2 on file. Having regard to the nature, size and location of the proposed development and to the criteria set out in Schedule 7 of the Regulations I have concluded at preliminary examination that there is no real likelihood of significant effects on the environment arising from the proposed development. EIA, therefore, is not required.

6.0 **The Appeal**

6.1. **Grounds of Appeal**

The grounds of appeal are set out as follows:

Transportation/Mobility

- The site is consistent with the '10-minute town' concept as advocated in Town Centre First Policy. A new Development Plan has been adopted by Cork County Council, in which the Council indicate their support for initiatives that provide a 10-minute town approach to development.
- The proposal will not endanger public safety by way of traffic hazard on Bothar na Sop. The proposal provides a 5.5m road and 2m footpath to ensure

that there will be no danger for both road users and non-road users to connect persons travelling towards Main Street.

- It is unreasonable to request the applicant to provide extensive road-widening and footpath extension further west of Bothar na Sop without any assistance from the local authority. This would require permissions from approximately 31 separate landowners. This requirement did not form part of the previous, and extant, planning permission on the site and should not be a pre-requisite condition of current proposal.
- The subject site was zoned since the 2005 LAP. There is no specific objective or precondition relating to this zoning in terms of improvements to roads or drainage.
- Widening Bothar na Sop to create a new link to the eastern end of the village would create a junction with the N71 through the village which would have significantly substandard sightlines and may need traffic signal control to achieve a safe junction.
- The potential exists for a vehicular and pedestrian connectivity route through Roselawn, onto L2037 Cork Road and thereafter into the village centre. There are traffic lights at the junction at which this route connects with the village.
- The use of concrete bollards to restrict access at the entrance (to Roselawn) is unauthorised since April 2001. Condition 1 of An Bord Pleanála decision required the bollards to be removed within 3 years of the grant date, which was 9 April 1998.
- The Council has taken Roselawn in charge. Applicant requests that these bollards be removed in conjunction with road widening along the Roselawn boundary, both elements are in charge of the council.
- Should the Board agree in relation to the bollards, and with the cooperation of the Council and adjoining landowner, the distance between Main Street and the subject site will be approximately 600m. This 10-minute walk is taken from the edge of the site to Main Street, via Roselawn.
- There are no straight stretches of road which may encourage speeding, and presence of junctions further discourages speeding in Roselawn estate. It does not pose a danger to both road users and non-road users. Only 8 of 33 residential units in Roselawn are adjacent to the proposed through road.

- Conditions 11, 12 and 13 of P.A. Ref. 21/6811 make provision for liaison with the local authority in respect of road frontage on that site. If the road improvements don't proceed as part of the adjoining planning permission (if granted on appeal), it is within council's gift to secure the necessary road improvements with the support of a special development contribution on the subject appeal.

Drainage

- The proposed development sufficiently addresses surface water concerns. A detailed response is addressed by J.B. Barry and Partners Limited.
- It is the applicant's understanding that the existing surface water network, outside of the site, copes well for the majority of rainfall events, and only gives rise to problems in high rainfall scenarios.
- Runoff from the proposed development site will be limited to the runoff from the current greenfield site in a 2-year storm event. This will ensure that the existing surface water network will not experience stormwater loading from the developed site.
- Runoff from the current greenfield site is uncontrolled. The runoff from the developed site in high rainfall events will be lower than the runoff from the current greenfield site, due to proposed SUDS measures and storm water attenuation facilities.
- Surface water calculations were submitted with the application which take account of the permeable and impermeable areas to be created by the proposed development. These calculations demonstrate that the flows from the proposed development will discharge at the restricted rate in all rainfall events up to and including the 1 in 100 year event and include an additional 10% climate change allowance.
- The existing surface water network outside the development site caters for runoff from adjacent developed and undeveloped lands, including Roselawn estate, and public roads in the vicinity. The existing runoff from these lands is uncontrolled. The applicant cannot improve the capacity or the condition of the existing surface water network outside of the development site, as this

network runs in the public road and through private properties over which the applicant has no control. The FI request suggesting a new outfall from the site to the village and outfalling to the river is not a realistic or viable option, including as an outfall solution would require significant third party approvals and significant funding.

- The applicant has no control over adjoining lands to the northwest. However, the current proposals make provision for collection of greenfield runoff from these lands and for directing this runoff to the existing surface water networks to the south on Bothar na Sop. As the existing surface water network currently carries this greenfield runoff, there will be no increase in surface water loading on the existing surface water network from these adjoining lands as a result of the proposed development.
- The FI submission had outlined that the under the current permission for this site (P.A. Ref. 13/4528, as extended by P.A. Ref. 18/7090), a condition was attached requiring a levy of €28,000 for exceptional costs incurred in the provision of an improved surface water outfall between Bothar na Sop and the N71. The applicant is satisfied that an appropriate planning contribution be levied on the current application to assist the Council to implement any such infrastructure upgrade.

6.2. Planning Authority Response

The planning authority has confirmed that it has no further comment.

6.3. Observations

6.3.1. 23 no. observations were received from the following:

Edward Kelly

Padraig Clifford

Clare Bywater

Dan and Sinead Jones

Una Dardis and Terry McSweeney

Deirdre O Riordan
Martina Warren
Seamus Walsh
Dermot Woods
Margaret and Jerry Larkin
Catherine Monning
Bernadette Conboy-Hyde
Anne Murphy
Catherine Lyons
Denise White
Catherine Ryan
Eleanor Healy
Maria and Thomas Gaffney
Sean and Diane Twomey
Keith and Clare Bywater
Sinead Crowe and Eamon Crowe
Steven Huggard
Kay Larkin

6.3.2. The main points in these observations may be summarised as follows:

- It is estimated that up to 30,000 vehicles per day pass through Innishannon.
- Traffic using Bothar na Sop is not restricted to residents and it is used as a shortcut. Concerns regarding speed of vehicles as access from Bothar na Sop onto the N71 at either end is uncontrolled.
- Concerns on health and safety grounds. It is dangerous to walk on Bothar na Sop at certain times of the day.
- Road surface on Bothar na Sop is in very poor condition. There are 45 houses currently on this road. No footpaths bar a short footpath serving 3 terraced houses.

- The visibility at Bothar na Sop access into village is poor.
- The road in Roselawn estate was designed to service 33 houses. It could not cater for increase in volume. There are 5 cul-de-sacs in Roselawn and some of the junctions are blind turns. The junction turning from Bothar na Sop into Roselawn is unsuitable for heavy traffic.
- Bollards at Roselawn were erected to make the area safe, as the estate had become a traffic thoroughfare.
- Removal of bollards would create a through-route into Roselawn and exit on Chapel Hill (Church Hill). It would be used to access the school on Church Hill. Five other housing estates on Church Hill would use Roselawn-Bothar na Sop through route as a shortcut to the Cork Road/N71.
- Works have been completed recently on Church Hill to make it safer for the school. Entrance into Roselawn has been narrowed as part of footpath upgrade works on Church Hill.
- The appeal refers to Roselawn estate as having been taken in charge by the Council. This is incorrect as areas are still owned privately, and as estate, green area maintenance is paid for privately. Land registry folio is attached. It appears that bollards are on private land.
- Engineer's report on the effect of a through road at Roselawn, compiled in 1997, is attached, which concludes that the proper planning and development of this area would be served by not opening up/blocking off the entrance to Roselawn from Bothar na Sop.
- Drainage is a major problem for Bothar na Sop. The run-off from elevated areas on the northern side of road runs southwards down into existing houses, many of which are below road level. The application makes no allowance for upgrades to existing stormwater network. Broadband and landlines for most houses on Bothar na Sop have been affected by excess water in recent years.
- Report by EPA, Met Eireann and Marine Institute predict that increase in global warming will lead to wetter conditions in Ireland and therefore more flooding.

- Site is predominantly made up of clay soil. Landslide is a possibility.
- Water pressure and water quality would possibly be affected.
- The density, scale and elevation of the development is not in keeping with other developments on Bothar na Sop. Proposed houses on elevated, sloping site would not be sympathetic. House would dominate skyline and overlook other properties on Bothar na Sop.
- Belief that development will happen and broadly welcome this but it has to be done on a similar scale to other estates in Innishannon.
- Proposal is on 4.3 acres of the field only. There is potential for more proposals in the future.

7.0 Assessment

7.1. Having examined the application details and all other documentation on file, including all of the submissions received in relation to the appeal, and inspected the site, and having regard to the relevant local/regional/national policies and guidance, I consider that the main issues in this appeal are as follows:

- Transport and Mobility
- Surface Water Drainage
- Masterplan/Site Strategy – New Issue
- Appropriate Assessment

7.2. Transport and Mobility

7.2.1. Reason 1 and Reason 2 of the planning authority's decision to refuse permission relate to the endangerment of public safety by reason of traffic hazard based on (1) insufficient road width and lack of pedestrian connectivity on Bothar na Sop between the site and N71/Main Street, and (2) inadequate road and footpath width within the subject site between Roselawn and south west corner of the proposed residential area resulting in poor permeability, accessibility and connectivity for pedestrians, cyclists and vehicle drivers, combined with sudden switch from a 3.5m to 5.5m wide road, and thereby in conflict with stated policy objectives of Cork County Development Plan 2014 and Bandon-Kinsale Municipal District LAP 2017, DMURS

and Sustainable Residential Development in Urban Areas (Cities, Towns and Villages) Guidelines. The applicant has set out in the grounds of appeal the reasoning as to why the planning authority's decision to refuse permission for these 2 no. reasons should be overturned.

- 7.2.2. With regard to the site context, I note that this is a greenfield site located within the development boundary of Innishannon. Some of the lands in the vicinity of the subject site are similarly greenfield sites within the village development envelope. The existing development along Bothar na Sop largely comprises of detached houses of varying design built over previous decades fronting directly onto the road, with the small Hillside Gardens estate (9 no. houses) also accessed from this road, and a more recent scheme of 3 no. terraced houses located at its more southerly end, near the village. A graveyard and church grounds also bound Bothar na Sop, and are accessed from Church Hill. In addition to the 50kph signage at the junction of Bothar na Sop to N71 on the northern approach to Innishannon, signage in place at this location includes cul-de-sac and 'Residents Access Only' signs. There is also a sign stating 20mph opposite the subject site.
- 7.2.3. The Roselawn estate has approximately 128m of roadside frontage onto Bothar na Sop, but no existing vehicular access from this road, due to the presence of bollards. This extent of roadside frontage excludes the separate site on which 2 no. houses have recently been permitted adjoining the open space at Roselawn; P.A. Ref. 21/6811 (ABP-313741-22) refers. The distance of the southeastern extent of the application site (near pedestrian entrance to Roselawn) to the junction with N71/Main Street in Innishannon village is approximately 410m.
- 7.2.4. I consider that one of the key issues is whether the proposed development would endanger public safety by reason of traffic hazard, and whether the proposed development would be in compliance with relevant policies and guidelines. In this regard I outline below the nature of the current proposal with regard to road and footpath proposals along Bothar na Sop, and also with regard to access to Roselawn estate from Bothar na Sop.

Road and Footpath along Bothar na Sop

- 7.2.5. The Further Information (FI) site layout shows a proposed 5.5m widened road and 2m wide footpath along the northeastern stretch of roadside frontage of the site, a

distance of approximately 130m, which relates to the main residential area of the site. Separately, over a distance of approximately 70m along the south westerly stretch of roadside frontage, a narrow area indicated by orange hatch shows a proposed footpath, varying in width from 1m to 1.7m. This limited width footpath connects to the proposed 2m wide footpath in front of the main residential area of the site. Along this 70m stretch of road, an additional 0.3m road surface width is also proposed. The 70m stretch of road on Bothar na Sop can be further broken down as two distinct parts, comprising approximately 21m and 49m in length.

7.2.6. Along the approx. 21m stretch of roadside, adjacent to the main residential area of the subject site, the FI site layout states that the applicant notes Condition 12 of P.A. Ref. 21/6811 (ABP-313741-22), and is relying on the council to agree public road and 2m footpath parameters along the public road edge. This planning permission for 2 no. houses includes Condition 12, which requires the Bothar Na Sop boundary edge of that development to be constructed in a position that would allow a 2 metre wide footpath, north of the existing road edge. The reason for the condition is to allow for the provision of a footpath on Bothar na Sop in the future. I note that this planning permission does not include any requirement to also widen the road to 5.5m or other stated dimension. In the event that this permission (P.A. Ref 21/6811 (ABP-313741-22)) is implemented, it would result in a discordant footpath layout, whereby an approx. 21m long footpath under that permission would be positioned forward of the 2m wide footpath and 5.5m widened roadway proposed in the current appeal.

7.2.7. I note that there is no presumption that this recent grant of permission P.A. Ref 21/6811 (ABP-313741-22) will be implemented. Accordingly, I consider that the matter of the footpath proposals in the current case should also be assessed based on the detailing shown within the red line boundary of the application site, the relevant policy and guidelines, and the documentation on the subject file. The letter of consent from the adjoining landowner outlines their consent for a new public footpath along the full width of their ownership, as shown coloured on the attached map. This map is not scaled. A separate 1:1000 scale Ownership Site Plan (Drawing No. 1194 - PL2 – 01F) lodged with the application shows the relevant details, albeit in the context of the application originally lodged.

- 7.2.8. With regard to the approximately 49m stretch of roadside frontage between the P.A. Ref. 21/6811 (ABP-313741-22) site and the approximate junction location with Roselawn estate, I note that the red line boundary of the application site is approximately 10m south east of the existing footpath at Roselawn. The FI response emphasises that land in front of Roselawn estate is in the charge of Cork County Council and a 2m wide footpath can be provided over this area. The FI site layout states that the applicant is relying on the Council, in conjunction with the adjoining ownership of P.A. Ref. 21/6811 to agree public footpath and public road parameters to link the proposed development with the existing Roselawn estate entrance.
- 7.2.9. In contrast, the Estates FI report (dated 14 July 2022) states that the adjoining green area within Roselawn estate is not owned by the Council, that the estate is taken in charge, that the applicants have failed to provide assurances that the necessary road improvement works to local road L-6067/Bothar na Sop can be carried out by either the applicants or the Roads Authority, and that the applicants have failed to demonstrate that a 2m wide footpath can be provided to link the proposed development to the existing footpath at Roselawn estate.
- 7.2.10. Based on the information on file, I consider that it has not been adequately demonstrated that a 2m wide footpath can be provided on lands at/along Roselawn estate as part of this application, to link the main residential area of the application site and its associated 2m wide footpath (in the context of a widened 5.5m wide roadway), to the southwestern extent of the subject site, or thereafter, to the existing footpath at Roselawn. Having regard to the nature of the overall roadside boundary proposals, as part of a development proposal for 25 no. dwelling houses, the proposed development would result in an abrupt transition from a 2m wide footpath to a 1m-1.7m wide footpath, all in the context of a transition from a 5.5m wide roadway to an approximately 3m-3.5m wide roadway. I consider that the provision of a footpath substantially less than 2m wide in places between the main residential part of the site and the narrow roadside frontage extending close to the junction with Roselawn estate on Bothar na Sop would endanger public safety by reason of traffic hazard. In this regard I consider that the proposed development would not be in accordance with Development Plan Objectives TM12-2-1 and TM12-2-2.
- 7.2.11. In addition, DMURS requires minimum footway widths to be 1.8m, and also requires footways to be maintained at a consistent width between junctions. Given that the

proposed footpath is in the range of 1m -1.7m wide over a 70m distance, the proposed development is not in accordance with these criteria. Sustainable Residential Development in Urban Areas Guidelines (2009) states that each residential scheme within a small town or village should be designed to make a positive contribution to its surroundings and provide for effective connectivity, especially by pedestrians and cyclists. In this case, I consider that it has not been adequately demonstrated that the proposed development would provide for effective connectivity for pedestrians in particular.

7.2.12. I note that Further Information request (Item 1) sought the applicant to provide a minimum 5.5m wide + 2m wide footpath carriageway, at developer's own cost, along the entire site frontage adjoining the L6067 (Bothar na Sop) to the junction with N71 in the village, to commit to obtaining legally binding agreements from adjoining landowners on all costs involved in acquiring land, and also stated that a development contribution is likely to be levied to improving the road surface. The FI response included that this request was unreasonable. The planning authority's Refusal Reason 1 states *inter alia* that the proposed development would endanger public safety by reason of traffic hazard, and would create circumstances whereby pedestrians and cyclists share a very narrow local road of insufficient width and lacking in pedestrian connectivity between the edge of the application site and the junction with N71/Main Street.

7.2.13. The applicant's grounds of appeal include that it is unreasonable to request the applicant to provide extensive road widening and footpath extension without any assistance from the local authority, and also that this would require permissions from approximately 31 landowners. I consider that the provision of road widening measures to comprise 5.5m wide roadway and 2m wide footpath over a distance of approximately 400m outside of the red line boundary of the application site, while desirable in terms of improving connectivity between the application site and the junction with N71/Main Street, cannot be easily provided within the context of this individual planning application.

Access to Roselawn Estate from Bothar na Sop

7.2.14. The FI submission includes a report by JB Barry & Partners Consulting Engineers which states that the green area south of Roselawn is in the ownership of the

Council, and it is their understanding that the entrance to Roselawn, currently blocked to vehicular traffic, is in the charge of the Council and represents a viable alternative vehicular entrance route between the subject site and the village. The FI site layout shows existing concrete bollards at the Bothar na Sop entrance to Roselawn estate, outside the red line boundary of the site. This drawing does not annotate proposed removal of the bollards.

- 7.2.15. The grounds of appeal request that these bollards be removed by the Council, and set out the rationale for Roselawn estate being used as both a pedestrian and vehicular route from Bothar na Sop. I note that the second Area Engineer's report (dated 12 July 2022) states that the proposal to allow traffic through Roselawn estate is not acceptable, that access to Church Road (Church Hill) junction with the N71 via Roselawn would become a diversion route option for N71 peak flow congestion, and that extra traffic through Roselawn estate would pose an increased safety hazard.
- 7.2.16. In this particular case, and notwithstanding the arguments put forward by the applicant in their request for the bollards to be removed and for Roselawn estate to be accessed by vehicular traffic, I consider that as these bollards are not within the red line boundary and are not indicated to be removed on the lodged drawings, and are also not proposed to be removed by other parties as part of this application, that the removal of these bollards does not form part of the current proposal.
- 7.2.17. I note that the site is within the 50kph speed limit. However, having regard to the location of the site on Bothar na Sop and to the receiving environment, I consider that the provision of a footpath substantially less than 2m wide as proposed along part of its roadside frontage on Bothar na Sop would endanger public safety by reason of traffic hazard, would not be in accordance with Development Plan Objectives TM12-2-1 and TM12-2-2, DMURS nor Sustainable Residential Development in Urban Areas Guidelines (2009). Refusal of permission is recommended on this basis.

7.3. Surface Water Drainage

- 7.3.1. Refusal Reason 3 of the planning authority's decision states that the planning authority is not satisfied that the full extent of calculated surface water arising from proposed development has been sufficiently addressed and would compound and/or lead to substantial risk of surface water pooling on the public road and running into

private property, thereby conflicting with objectives in the Cork County Development Plan 2014 and Bandon-Kinsale LAP 2017 which seek to ensure that all new developments make provision for stormwater drainage.

- 7.3.2. I note the content of the plans and particulars on file, including the second Area Engineer's report (dated 12 July 2022) which states that to allow 25 houses at this location requires surface water drainage on Bothar na Sop to be addressed to ensure that the additional motorists and pedestrians are able to use this road without concerns relating to flooding and ponding on parts of the road.
- 7.3.3. The applicant's grounds of appeal state that it is their understanding that the existing surface water network outside of the site copes well for the majority of rainfall events, and only in high rainfall scenarios does it give rise to problems. I note in particular the information submitted with the application and the appeal, which outlines *inter alia* that the runoff from the proposed development in high rainfall events will be lower than runoff from the current greenfield site, due to proposed SUDS measures and storm water attenuation facilities, and that the surface water calculations demonstrate that the flows from the proposed development will discharge at the restricted rate in all events up to and including the 1 in 100 year event and includes for 10% climate change allowance. The FI submission shows a 400m³ attenuation tank is proposed within the open space area, close to the roadside boundary of the site.
- 7.3.4. With regard to adjoining lands to the north west, the applicant states while they have no control over these lands, the current proposals make provision for collection of greenfield runoff from these lands and for directing this runoff to the existing surface water networks to the south on Bothar na Sop. It is stated that as the existing surface water network currently carries this greenfield runoff, there will be no increase in surface water loading on the existing surface water network from these adjoining lands as a result of the proposed development. The applicant states that the existing surface water network outside the development site caters for uncontrolled runoff from adjacent developed and undeveloped lands and public roads in the vicinity, and that the applicant is not in position to improve the capacity or the condition of the existing network outside of the development site, as it runs in the public road and through private properties over which the applicant has no control. The applicant states that the FI request suggesting a new outfall from the site to the village and

outfalling to the river is not a realistic or viable option, including as an outfall solution would require significant third party approvals and significant funding.

- 7.3.5. I note that the applicant states that they are satisfied that an appropriate contribution be levied on the current proposal, whereby they note that a levy of €28,000 for exceptional costs incurred in the provision of improved surface water outfall between Bothar na Sop and the N71 was attached to P.A. Ref. 13/4528 (extended by P.A. Ref.18/7090). Having regard to the plans and particulars on file, I consider that sufficient detail has been provided to demonstrate that the surface water drainage proposals are acceptable. In the event that the Board is minded to grant permission for the proposed development, it is considered that the attachment of a condition requiring payment of a special contribution relating to surface water drainage infrastructure would be appropriate in this case.

7.4. Masterplan/Site Strategy – New Issue

- 7.4.1. I note that the first Area Planner's report did not consider that a masterplan for the site and overall lands was required. Further Information (Item 7) requested details to demonstrate that the proposed development would not negatively impact on any future development of the adjoining sites to the rear in terms of accessibility, connectivity and servicing of the adjoining lands. The second Area Planner's report noted that the FI submission proposed or is designed to cater for a future footpath connection into backland in the north west corner of the site.
- 7.4.2. The FI submission states that access to the adjoining lands can be provided directly to the east of the eastern site boundary. I note that the provision of an access route at this location would be in close proximity to the vehicular entrance proposed at the subject site. I would have concerns that this would appear to be inefficient use of land within the development boundary. The overall length of this potential access route is approximately 140m. In addition, I consider that the provision of stockproof fencing on the outer side of rear garden boundaries, proposed in the context of swales, would not be a visually appealing interface with a potential access route to a large landbank to the rear. The FI submission (architect's letter) states that the adjoining lands are also served by an agricultural entrance on Cork Road/Church Hill.

- 7.4.3. With regard to connectivity, the FI submission states that the modified layout can facilitate a pedestrian entrance at the north east corner of the site. However, the FI site layout does not show a specific potential permeability link to adjoining undeveloped lands.
- 7.4.4. I note that the adjoining lands are stated not to be in the ownership of the applicant. Having regard to the extent of the subject site, and the substantial size of the greenfield lands immediately adjacent, I consider that the preparation of an overall masterplan for the site and adjoining lands, or site strategy for the subject site which clearly shows potential access/permeability to adjoining undeveloped lands, would be appropriate in this case. This is a new issue and the Board may wish to seek the views of the parties. However, having regard to the other substantive reason for refusal, it may not be necessary to pursue the matter.

7.5. **Appropriate Assessment**

Having regard to the nature and scale of the proposed development, the nature of the receiving environment and proximity to the nearest European site, it is concluded that no Appropriate Assessment issues arise as the proposed development would not 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. It is recommended that planning permission be **refused** for the reason set out below.

9.0 **Reasons and Considerations**

Having regard to the nature and scale of the proposed development located on Bothar na Sop, a local road which links to the N71 on both the approach to Innishannon village and at its N71/Main Street junction, the proposed development would, by reason of limited footpath and roadway width along the southwestern end of the site near the pedestrian entrance to Roselawn estate, and in the context of the abrupt transition from a narrow road to a proposed 5.5m wide roadway along the roadside frontage of the site, endanger public safety by reason of traffic hazard, and would lead to conflict between road users, that is, vehicular traffic, pedestrians and

cyclists. In addition, having regard to the information lodged with the application and appeal, and submissions received, it has not been adequately demonstrated that a footpath of adequate width can be provided on lands at/along Roselawn estate, to link the main residential area of the site to the southwestern site boundary as part of the proposed development. The proposed development would not be in accordance with Objectives TM12-2-1 and TM12-2-2 of the Cork County Development Plan 2022-2028, Design Manual for Urban Roads and Streets, and Sustainable Residential Development in Urban Areas (Cities, Town and Villages) Guidelines (2009). 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.

Cáit Ryan

Senior Planning Inspector

5 September 2023