



An
Bord
Pleanála

Inspector's Report

ABP-315588-23

Development	Erection of 18m monopole communications structure
Location	Eir Exchange, Main Street, Glanduff, Kilbrittain, Co. Cork
Planning Authority	Cork County Council
Planning Authority Reg. Ref.	22/6364
Applicant(s)	Eircom Ltd (t/a eir)
Type of Application	Permission
Planning Authority Decision	Refuse Permission
Type of Appeal	First Party
Appellant(s)	Eircom Ltd (t/a eir)
Observer(s)	None
Date of Site Inspection	19 July 2023
Inspector	Cáit Ryan

1.0 Site Location and Description

- 1.1. The site is located on Main Street, Kilbrittan village, approximately 10km south of Bandon. Main Street is part of regional road R603 which connects Bandon with a further regional road linking Clonakilty and Kinsale. The village has an east-west alignment along the valley floor. The main village development is primarily a linear format along Main Street. A short distance north of Main Street, Kilbrittain River runs in a north west to south east direction, and continues to flow in a south east direction at the eastern end of the village. The lands to the rear of Main Street slope from south to north towards the river, and then rise further north of the river. To the south, Glanduff woods is elevated above the village.
- 1.2. The site is directly to the rear of the existing single storey eir exchange building, on the north side of Main Street. It is set back approximately 9m from the roadside boundary, and the existing exchange building is indicated to be within the landholding, outlined in blue. The site is rectangular in shape, and comprises 0.001327ha. An existing 10m high wooden pole with a further 2.8m high antenna is located on site.

The roadside frontage of the overall premises outlined in blue is 6.1m wide, and comprises an approximately 1m high stone wall with a pedestrian entrance. The open parking area to the front of Kilbrittain Parish Hall bounds the eir premises to the west. The rear building line of the eir exchange building is forward of Parish Hall. The boundary between these two sites comprises an approximately 1m high wall. Further to the west of the Parish Hall are 2 detached houses, beyond which are two separate terraces, each of 7 no. houses.

The north (rear) site boundary and eastern boundary of the overall eir premises comprise chainlink fencing with concrete posts, which bound a field that extends to Kilbrittain River. There is an approximately 12m wide stretch of roadside frontage to the east of the overall eir exchange premises, which includes an agricultural entrance to this field. Further to the east is a terrace of 2-storey houses.

This part of Main Street is primarily residential in character, on both sides of the street. A church is located approximately 150m to the west of the site, and Kilbritten National School is located to the south of same.

2.0 Proposed Development

- 2.1. The application involves permission to erect a 18m high monopole communications structure together with antennas, dishes and associated telecommunications equipment. Drawings lodged with the application show that the overall height would be 21.6m, which includes 3.6m high emergency services radio aerials. It is proposed to remove the existing 10m high timber pole. Two no. double bay cabinets are proposed, each comprising 2.21sqm. A cover letter submitted by Towercom, on behalf of the applicant, outlines justification for the new structure, merits of proposed site, and consequences of not securing the site.
- 2.2. A letter of support from Tetra Ireland Communications Ltd. was included in the lodged application, which confirms that it has equipment located on another structure at this location which forms part of the National Digital Radio Service (NDRS) for the Emergency Services. There is potential for Tetra Ireland to transfer the equipment to the new structure. The increased height would benefit emergency service users, as it would increase coverage.

3.0 Planning Authority Decision

3.1. Decision

The planning authority decided to refuse permission for two reasons, as follows:

1. The proposed development, by reason of its scale, height and proximity of the proposed structure relative to existing adjacent residential property would seriously injure the residential amenities and depreciate the value of property in the vicinity, by reason of proximity and visual intrusion. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.

2. The subject site is positioned within the development boundary of the Kilbrittan village and adjacent to designated Scenic Route S68. As stated in the Cork County Development Plan 2022 it is the policy under objectives GI 14-9, GI 14-13 and GI 14-15 to protect the character of those very special views and prospects and to recognise that approach roads into and out of villages are protected from inappropriate development which would detract from the setting and character of the settlement. Having regard to the provisions of the Cork County Development plan 2022, it is considered the proposed development would, by reason of its location, height, scale and utilitarian nature seriously injure the visual amenities of the area and interfere with the character of the landscape and would contravene materially stated Objectives GI 14-9, GI 14-13, GI 14-14 of the Cork County Development Plan 2022, which generally seek to protect the character of the landscape and the views obtainable from scenic routes. 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

- **Area Planner's report** dated 8 December 2022 stated that no justification provided for site selection, beyond presence of a long-standing telecom exchange, noted proximity of the site to existing dwellings, and considered that the proposal would seriously injure the visual and residential amenities and detract from the views on Scenic Route S68. Refusal recommended for 2 no. reasons consistent with the subsequent decision.
- **Senior Executive Planner's report** dated 9 December 2022 noted that existing 24m high communication mast (P.A. Ref. 16/4930) is located at a higher elevation 2.7km east of the subject site. Report concurs with Area Planner's recommendation to refuse permission.

- **Senior Planner's report** dated 13 December 2022 concurs with the recommendation to refuse permission.

3.2.2. Other Technical Reports

- **Area Engineer's report** dated 2 December 2022 recommends grant and states no engineering concerns.
- **Environment** report dated 16 November 2022 states no objection to a grant of permission, subject to 2 no. conditions, both of which relate to waste management.

3.3. Prescribed Bodies

Iris Aviation Authority (IAA): No requirement for obstacle lighting on the proposed telecommunications structure.

3.4. Third Party Observations

None.

4.0 Planning History

Subject Site

No relevant planning history.

Sites in Vicinity

P.A Ref. 16/4930 Permission granted in 2016 to retain an existing 24 metre high telecommunications support structure (previously granted under P.A. Ref. 11/5443 which was for a temporary period of 5 years which has expired), carrying antennas and link dishes together with associated equipment and security fencing, at Currarane, Kilbrittan.

This mast is located approximately 2.9km southeast of the subject site.

5.0 Policy Context

5.1. Cork County Development Plan 2022-2028

The site is located within the development boundary of Kilbriain village. There are no specific objectives relating to the site. The site is on Scenic Route S68, which is described as Road from Kilbriain to the junction with Ballinspittle Road. This route extends from a point approximately 200m west of the subject site, eastward along Main Street, and thereafter generally along Kilbriain River. It connects to Scenic Route 67 (Road from Old Head to Timoleague via Garrettstown, Coolmain and Harbour View). The Overall Landscape Value of Route S68 is described as Medium – Very High (Volume 2; Table 2.5.1)

The subject site is not within a High Value Landscape. Lands approximately 1km to the east form part of an extensive High Value Landscape designation along much of the County's coast and adjoining inland areas. The southeastern stretch of Scenic Route S68 is within High Value Landscape.

Volume 1 – Main Policy Material

Objective ET 13-28: Information and Communications Technology

- a) Facilitate the delivery of a high capacity ICT infrastructure and high-speed broadband network and digital broadcasting throughout the County in accordance with the Guidance on Environmental Screening / Appropriate Assessment of Works in relation to the Deployment of Telecommunications Infrastructure (2020).
- b) Support the roll out of the National Broadband Plan throughout the County in conjunction with relevant statutory agencies and in accordance with the above Guidance document.
- c) Support the role of Smart City / Smart Region initiatives and the role of smart technologies to urban and rural areas.

Section 13.18 Communications and Digital Connectivity includes the following:

Section 13.8.1 Access to high quality digital and mobile telecommunications infrastructure is critical to the social and economic wellbeing of communities and can support the revitalisation of towns, villages and rural areas. Developments in digital, information and communications technology continue to fundamentally change how our society and economy functions. The relational proximity of all locations will improve with advances in technology. To optimise the opportunities from smart technology, access to high-speed, high capacity digital and communications infrastructure needs to improve across the County.

Section 13.8.3 While the importance of telecommunications infrastructure is acknowledged, it is equally as important that the landscape, both urban and rural, are considered and protected from any significant impact caused by such infrastructure. Visual impact should be minimal in the landscape and therefore, telecommunications infrastructure will be subject to a Visual Impact Assessment. Environmental, heritage and ecological impacts of any such infrastructure will also be assessed in accordance with standard Council policies and procedures.

(It is noted that there would appear to be a discrepancy in the numbering of subsections under Section 13.18 of the online version of the County Development Plan. However, this does not materially impact on the assessment of the appeal).

GI 14-9: Landscape

- a) Protect the visual and scenic amenities of County Cork's built and natural environment.
- b) Landscape issues will be an important factor in all land-use proposals, ensuring that a pro-active view of development is undertaken while protecting the environment and heritage generally in line with the principle of sustainability.
- c) Ensure that new development meets high standards of siting and design.
- d) Protect skylines and ridgelines from development.
- e) Discourage proposals necessitating the removal of extensive amounts of trees, hedgerows and historic walls or other distinctive boundary treatments.

Objective GI 14-10: Draft Landscape Strategy Ensure that the management of development throughout the County will have regard for the value of the landscape, its character, distinctiveness and sensitivity as recognised in the Cork County Draft Landscape Strategy and its recommendations, in order to minimize the visual and environmental impact of development, particularly in areas designated as High Value Landscapes where higher development standards (layout, design, landscaping, materials used) will be required.

Objective GI 14-11: Draft Landscape Strategy, Land Use Plans and Policy

Guidance Have regard to the Draft Cork County Landscape Strategy (2007) in the preparation of plans and other policy guidance being prepared during the lifetime of the Plan. Review and update the Draft Cork County Landscape Strategy as soon as is practicable following the publication of a National Landscape Character Assessment as well as taking into account any associated guidelines.

Whilst advocating the protection of such scenic resources the Plan also recognises the fact that all landscapes are living and changing, and therefore in principle it is not proposed that this should give rise to the prohibition of development along these routes, but development, where permitted, should not hinder or obstruct these views and prospects and should be designed and located to minimise their impact. This principle will encourage appropriate landscaping and screen planting of developments along scenic routes.

Objective GI 14-13: Scenic Routes Protect the character of those views and prospects obtainable from scenic routes and in particular stretches of scenic routes that have very special views and prospects identified in this Plan. The scenic routes identified in this Plan are shown on the scenic amenity maps in the CDP Map Browser and are listed in Volume 2 Heritage and Amenity Chapter 5 Scenic Routes of this Plan.

Objective GI 14-14: Development on Scenic Routes

a) Require those seeking to carry out development in the environs of a scenic route and/or an area with important views and prospects, to demonstrate that there will be no adverse obstruction or degradation of the views towards and from vulnerable

landscape features. In such areas, the appropriateness of the design, site layout, and landscaping of the proposed development must be demonstrated along with mitigation measures to prevent significant alterations to the appearance or character of the area.

b) Encourage appropriate landscaping and screen planting of developments along scenic routes (See Chapter 16 Built and Cultural Heritage).

Volume 5 – West Cork

5.1.1. **Section 1.19.1** sets out that the vision for Kilbrittain is to encourage development within the village, to maintain the compact village core where services and amenities are available.

5.1.2. **Specific Development Objective U-01:**

*Develop and maintain amenity walk. Riverside walks will be required to be designed having regard to best practice guidelines, taking account of need to protect freshwater habitats and species. * (*Flood Risk)*

The U-01 route is indicated to be along the northeastern bank and northeastern extent of river through Kilbrittan, linking local road L-6086-0 to a point approximately north of the bridge in Kilbrittain.

5.2. **National Planning Framework**

The NPF generally supports improving local connectivity in terms of broadband and enabling infrastructure that affords rural communities the same opportunities to engage with the digital economy as for those who live in towns and cities.

National Policy Objective 24 seeks to support and facilitate delivery of the National Broadband Plan as a means of developing further opportunities for enterprise, employment, education, innovation and skills development for those who work and live in rural areas.

5.3. Telecommunications Antennae and Support Structures – Guidelines for Planning Authorities (1996)

These guidelines set out national policy in relation to telecommunications structures. Guidance is given in relation to matters such as design and siting, visual impact, sharing and clustering of facilities and development management. The Guidelines are generally supportive of the development and maintenance of a high-quality telecommunications service.

Section 4.3 relates to visual impact. It notes that in most cases the applicant will only have limited flexibility as regards location, given the constraints arising from radio planning parameters, etc. It states that in locations which are sited along major roads and tourist routes, that where the mast is visible but does not terminate views, the impact may not be seriously detrimental. Furthermore, where views may be intermittent and incidental, the mast may be visible or noticeable but may not intrude overly on the general view or prospect.

Only as a last resort should free-standing masts be located within or in the immediate surrounds of smaller towns or villages, be located in residential areas or beside schools. In such cases, sites already developed for utilities should be considered and masts should be designed and adapted for the specific location and kept to a minimum height for effective operation.

Section 4.5 relates to sharing facilities and clustering. It states that applicants will be encouraged to share and to satisfy the authority that they have made a reasonable effort to do so. Where it is not possible, the applicant should be encouraged to share a site or to site adjacently, so that masts and antennae may be clustered. In urban or suburban areas use of the same structure or building by competing operators will almost always improve the situation.

5.4. Telecommunications Antennae and Support Structures and DOECLG Circular Letter PL 07/12

This Circular Letter provided updated guidance to the 1996 Guidelines. The 1996 Guidelines advised that planning authorities should indicate in their development plans any locations where, for various reasons, telecommunication installations would not be favoured or where special conditions apply, and suggested that such locations might include lands whose high amenity value is already recognised in a development plan, protected structures, or sites besides schools.

Section 2.3 of the Circular states that while these policies are reasonable, there has been a growing trend for the insertion of development plan policies and objectives specifying minimum distances between telecommunications structures from houses and schools. Such distance requirements can make the identification of a site for new infrastructure very difficult, and planning authorities should therefore not include such separation distances as they can inadvertently have a major impact on the roll out of a viable and effective telecommunications network.

Section 2.6 reiterates the advice contained in the 1996 Guidelines that planning authorities should not include monitoring arrangements as part of planning permissions and that planning applications should not be determined on health grounds. Planning authorities should be primarily concerned with the appropriate location and design of telecommunications structures and do not have competence for health and safety matters in respect of telecommunications infrastructure. These are regulated by other codes and such matters should not be additionally regulated by the planning process.

5.5. Natural Heritage Designations

Courtmacsherry Estuary Special Area of Conservation (Site Code 001230) is approximately 1.16km south east of site.

Courtmacsherry Bay Special Protection Area (Site Code 004219) is approximately 1.4km southeast of the site.

Courtmacsherry Esturay Proposed Natural Heritage Area is located approximately 1.16km from the appeal site.

5.6. EIA Screening

The development is not of a class for which EIAR is required.

6.0 The Appeal

6.1. Grounds of Appeal

The grounds of appeal are as follows:

- The proposal would not seriously injure the residential amenities or depreciate the value of property in the vicinity, affect visual amenity, interfere with the character of the landscape, nor be contrary to proper planning and sustainable development of the area. No empirical evidence that telecoms infrastructure has a devaluation effect on property.
- The application proposed an 18m monopole telecommunications support structure with associated equipment. The appeal submission reduces the height by 3m to 15m, resulting in overall height of 18.6m, to include aerials.
- The selected height of 18m, and 15m to a lesser degree, would facilitate co-location and so negate a proliferation of masts.
- Photomontages demonstrate minimal visual impact of the proposed 15m structure at selected viewpoints. The structure would be noticeable rather than intrusive. It does not create a terminating view, does not impact any vulnerable features or amenities and is away from protected sites and monuments.
- The proposed pole would be visible in certain views, these would be intermittent and incidental. It would not cause an overly intrusive visual impact

on Scenic Route S68. The site is located amongst dwelling houses, the Parish Hall and many existing vertical structures.

- Acknowledged that site is within High Value Landscape. It is impossible to avoid this designated area.
- The structure is within an established utilities and telecommunications location.
- ComReg coverage map shows that there is a clear deficiency in basic 4G 'fair' and 5G 'fringe' coverage in Kilbrittain and surrounding area. Coverage plot submitted with appeal shows potential 'Good Signal Strength' coverage provided with the 15m structure height.
- ComReg coverage maps are based on outdoor coverage levels. Indoor levels will be smaller. It is important to be close to the source of demand, as better insulation materials may reduce mobile phone signal strength.
- Assessment provided with the application of the existing telecommunication support structures within the surrounding area and their suitability to provide the necessary location/structure for required coverage objectives. None were identified. No suitable rooftops were available.
- Vodafone, Three Ireland, Imagine and eir currently transmit at the mast at Steilanagh Td. The limitation of this structure is its distance at 2.9km from Kilbrittain. While 2G (basic voice services) will be sufficient at this distance, the range of geographic cover decreases for technology through 3G, 4G and 5G. There is a negative correlation between higher frequency technologies and coverage range. The footprint that 5G can cover is much smaller than that of 2G and 3G.
- Changes in the market will impact areas with inadequate 4G and 5G coverage. Vodafone is turning off its 3G network at end of 2023, and Three Ireland to switch off its 3G network by end of 2024.

- The proposed structure provides a critical service for Kilbriain which will grow in population. The structure and compound are designed to house equipment for eir, Tetra Ireland and potentially other operators in the future.

6.2. **Planning Authority Response**

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

6.3. **Observations**

None received.

7.0 **Assessment**

7.1. I consider that the issues arising can be assessed under the following headings:

- Compliance with Planning Policy
- Need for Development and Assessment of Alternatives
- Visual and Residential Amenity
- Appropriate Assessment
- Other Issues

7.2. **Compliance with Planning Policy**

7.2.1. The overall height of the telecommunications structure now proposed, as per appeal submission, is to provide a 15m high monopole, with 3.6m emergency services radio aerials, extending to an overall height of 18.6m.

7.2.2. The planning policy for the area includes facilitating high capacity ICT infrastructure throughout the county, as set out in Objective ET 13-28 of the current Cork County Development Plan, in addition to Telecommunications Antennae and Support

Structures Guidelines (1996) and Circular Letter PL07/12 Telecommunications Antennae and Support Structures, which promote the provision of modern telecommunications infrastructures. The Guidelines state that only as a last resort should free-standing masts be located within or in the immediate surrounds of smaller towns and villages, or be located in residential areas or beside schools. It is stated that where this cannot be avoided, sites already developed for utilities should be considered and masts should be designed and adapted for the specific location and kept to a minimum height for effective operation.

7.2.3. The existing eir exchange site is located in the centre of Kilbrittain. There are houses within the immediate vicinity of the proposed site, the nearest being approximately 15m to the east. The grounds of Kilbrittain National School are approximately 125m to the south west. While the site is located within the development boundary of Kilbrittain, there is no specific land use zoning identified for the subject site. The cover letter submitted with the planning application states that the existing 10m high timber pole carries equipment for Tetra Ireland, which is used by emergency services.

7.2.4. Having regard to national policy as set out in the Telecommunications Antennae and Support Structures Guidelines (1996) and Circular Letter PL07/12 Telecommunications Antennae and Support Structures, I consider that the siting of the proposed development would generally be in compliance with the national guidance on the siting of such structures, given the long established use of the site, and would generally be acceptable, subject to being appropriate in respect of the visual and residential amenities of the area, and provided that it does not contravene other planning policies for the area.

7.3. **Need for Development and Assessment of Alternatives**

7.3.1. The documentation submitted with the application and appeal setting out the rationale for the need to provide coverage in Kilbrittain and surrounding area, in the context of the existing 4G and 5G coverage, states that there is a negative correlation between higher frequency technologies and coverage range, and includes extracts from Comreg's outdoor mobile coverage map. While much of the detail on the submitted Comreg map is not easily discernible, I consider that based

on the applicant's submission, the need for upgrade has been adequately demonstrated.

- 7.3.2. Maximising the potential of mast sharing and co-location is one of the key pillars of national policy. I note that the applicant states that the selected height of 18m, and 15m to a lesser degree, would facilitate co-location, and that the structure and compound are designed to house equipment for eir, Tetra Ireland and potentially other operators in the future. As Tetra Ireland is stated to be an Irish company which owns and operates the National Digital Radio Service (NDRS), and is the national critical communications network, this would indicate, based on the information on file, that Tetra Ireland is distinct from mobile service providers. However, with regard to other operators, I note that it is indicated on file that the proposed development would potentially accommodate other operators in the future, and this is considered acceptable.
- 7.3.3. With regard to the assessment of alternatives, the appeal submission states that the existing telecommunications structure (at Currarane Td.) has been discounted as an alternative location due to its relative distance of 2.9km from the subject site, whereby at this distance, coverage begins to taper off. Eir, along with Vodafone, Three Ireland and Image currently transmit from this lattice tower. It is stated that no suitable existing telecommunication support structures within the surrounding area were identified, and no suitable rooftops were available. Based on the submitted information, in the context of existing structures, I consider that an absence of potential alternatives has been adequately demonstrated.

7.4. Visual and Residential Amenity

- 7.4.1. The site occupies a central location on Main Street, Kilbrittain. The proposed telecommunications support structure would be set back approximately 10m from its roadside frontage. There is some variation in buildings lines at this part of Main Street. The monopole structure would be positioned to the rear of the building line established by the terraced houses to the east, forward of Kilbrittain Parish Hall to the west, and marginally set back from the building lines established by the two detached houses west of the Parish Hall. The site is located on Scenic Route S68, identified in the County Development Plan. The existing 10m high timber pole with

the further 2.8m high antenna is easily visible from points near the subject site on Main Street, such as opposite the site, and as viewed from the west of the site. While it is visible from some locations east of the structure, it is not visible from points further east on Main Street, due to the two-storey terraced houses to the east of the site. In addition, there is a gradual slope on Main Street, falling from west to east at the eastern end of this street.

- 7.4.2. The drawings submitted with the appeal show the proposed 15m high monopole with associated operator's equipment with 3-prong 3.6m high emergency services radio aerials. The photomontages submitted with the appeal reflect these revised drawings. While the photomontages are useful in the context of longer-range views, and include images from the eastern and western ends of Main Street, no 'near' views showing its context to the more immediate streetscape have been submitted.
- 7.4.3. I consider that some of the submitted longer range views, such as from L-6086-0, which is located to the north of Kilbrittain river, indicate that the proposed development would, while visible, have limited visual impact. I note also that the applicant highlights that views of the monopole would be intermittent and incidental to road users. However, having regard to its central location on Main Street, and notwithstanding the reduced height of the monopole as shown in the appeal submission, and the existing utility use of the site, I consider that the proposed development, by reason of its overall height and scale, would become a dominant presence in the streetscape, would be visually obtrusive, and would have a negative impact on the character of the area. I consider that the proposed development would be injurious to the visual and residential amenities of the area. Refusal of permission is recommended on this basis.
- 7.4.4. The proposed development includes two no. cabinets, of 1.65m height and 1.34m width, located to the rear of existing eir exchange building. Having regard to the size of these cabinets and more particularly to their location to the rear of the existing eir exchange building, these structures would not be easily visible from adjoining public roads, nor from longer range views, and I consider that the cabinets by themselves would not adversely impact on the visual amenities of the area.

7.5. **Appropriate Assessment**

7.5.1. Having regard to the nature and scale of the proposed development, which comprises a new telecommunications support structure and associated structures, and removal of an existing timber pole, 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.

7.6. **Other Issues**

7.6.1. I note that there are some discrepancies on drawings/documentation lodged with the application and appeal, which are outlined below for the Board's information:

- The 'South Elevation – Existing' drawings lodged with the application (19 October 2022) and appeal (25 January 2023) show the existing 10m high wooden pole and antenna on the front (south) elevation of the site, and forward of both the exchange building and the roadside boundary. However, this structure is located to the rear (north) of the exchange building, and the existing site layout plan shows this pole to the rear.
- The appeal documentation refers to an existing support structure located at Steilaneigh. The structure permitted by P.A. Ref. 16/4930 is however located at Currarane, which adjoins Steilaneigh townland.

However, I consider these discrepancies to be minor, and to not materially impact on the assessment of the appeal.

8.0 **Recommendation**

8.1. It is recommended that permission be refused for the reason set out below.

9.0 Reasons and Considerations

Having regard to the location of the site in the centre of Kilbrittain village, on Scenic Route S68, as designated in Cork County Development Plan 2022-2028, and which is in close proximity to a number of dwelling houses, to the height and scale of the proposed development, and to the 'Telecommunications Antennae and Support Structures – Guidelines for Planning Authorities' issued by the Department of the Environment and Local Government (1996), as updated by Circular Letter PL07/12, it is considered that the proposed development, by reason of its visual prominence would not integrate satisfactorily into the streetscape, would be unduly obtrusive and would adversely impact on the visual and residential amenities of the area. The proposed development would be contrary to Objectives GI 14-9 and GI 14-13 of current County Development Plan, and 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

25 September 2023