

Inspector's Report ABP-316173-23

Development Construction of a dwelling, wastewater treatment plant,

new vehicular entrance and all associated site works.

Location Haven Hill, Forthill & Bawnavota, Kinsale, Co. Cork.

Planning Authority Ref. 22/5567.

Applicant(s) Alistair Robinson.

Type of Application Outline PA Decision To Grant Outline

Permission. Permission.

Type of Appeal Third Party. Appellant Patrick Plunkett & Carol

Heaslip.

Mary Forde.

Observer(s) Gerard Finn.

Declan Connolly.

Date of Site Inspection 22nd **Inspector** Aiden O'Neill.

January,

2024.

Context

1. Site Location/ and Description.

The proposed development site is c. 0.1843ha in area and is an undeveloped, sloping, greenfield, infill site located within an established suburban residential area of the village of Summercove, within the development boundary of Kinsale

Town. It is generally rectangular in shape and slopes from its highest point (c. 35mOD) along the north-eastern and south-eastern boundary towards the northwestern boundary (c.29mOD). It is accessed off a narrow cul de sac that serves 4no. existing dwellings. This cul de sac connects to the main Haven Hill residential estate road to the east, and this estate road connects to Forthill Road to the southeast, a route that facilitates a connection between the estate and Kinsale town centre, as well as the R600 Cork Road The proposed development site is bounded to the north by the cul de sac road, separated by a Leylandii hedge, and to the north-east, south-west and south-east by single-storey dwellings. Boundary treatments to the north-east and to the south-east comprise hedging at a higher level (there is also a gate on the north-eastern boundary) and to south-west comprises a wooden fence. The site is in grass to the north but is overgrown with relatively dense scrub to the south. There is evidence of dumping of garden waste on the south-western boundary. The existing dwellings to the north-east are semidetached and are located c. 17.4m from the boundary of the proposed development site at a higher level (the FFL of the nearest dwellings (nos. 21 and 22) is 38.2mOD). The existing detached dwelling to the south-east which is accessed via Forthill, is located c. 4m from the boundary of the proposed development site and is also at a higher level (FFL of 37.71mOD), whereas the detached dwelling to the south-west, located c. 7m from the boundary of the proposed development site is at a lower level (no FFL is indicated but the ridge height of the dwelling is 35.52mOD). Haven Hill residential estate extends further north and east of the proposed development site. From the information on file, it appears that only part of the estate has been taken in charge by Cork County Council. The site and general area commands extensive views of Kinsale Harbour and Kinsale Town to the west and north-west.

2. Description of development.

Outline permission is sought for the proposed development which will consist of the construction of 1no. single-storey 4-bed detached dwelling house, c. 200m2 in area, a wastewater treatment plant, new vehicular entrance with 1m high rendered blockwork piers and permeable driveway, with parking provided for c. 2no. cars, and all associated site works on a site of c. 0.1843ha. The existing hedge along

the estate road is to be removed and replaced with a grass verge and 1m high timber post and 3-rail fence, with hedging inside, set back from the road edge. The FFL of the proposed single-storey dwelling is 33.5mOD. The proposed dwelling is to be sited towards the north-eastern boundary of the site, at a higher level. The Proposed Site Plan indicates that the proposed dwelling is sited c. 26.76m from the existing dwelling to the north-east; 33.155m from the existing dwelling to the south-east; and 23.145m from the existing dwelling to the south-west. The proposed dwelling is to be served by public mains, via an extension to the existing Uisce Eireann mains in Haven Hill. Surface water is to be addressed via 2no. soakpits. The proposed treatment plant is a tertiary treatment system and infiltration treatment area, with direct discharge to groundwater. The application form states that it is proposed to sell the site.

3. Planning History.

The following planning history applies to the proposed development site:

PA Ref. No. 94/2281 Outline planning permission to construct a dwelling house was refused on 8th September, 1994. It is stated in the planner's report under PA Ref. No. 22/5567 that the refusal was on the basis of a lack of services to support the development.

Other applications of note in the vicinity include:

PA Ref. No. 22/6825 Partial demolition, alterations, extensions and associated landscaping works to the existing dwelling house further west, granted permission on 30th March, 2023. The application refers to a concern raised by the Council that the existing foul drainage system is hydraulically full and maybe even overloaded, however it concludes that the additional load from the existing dwelling can be accommodated in the existing foul sewer network.

PA Ref. No. 18/6694 Retention permission for (a) as constructed domestic garage, (b) secondary waste water treatment unit and polishing filter with all necessary ancillary works, for the dwelling to the south-east of the proposed development site, granted permission on 16th January, 2019. This dwelling, which was originally granted permission by the Board, overturning Cork County Council's decision to refuse permission on grounds of an inadequate sewerage system, among others,

(PL04.207883 (04/2874)), was originally to connect to the public foul sewer.

4. National/Regional/Local Planning Policy (see attached)

- The Cork County Development Plan 2022-2028 was adopted by the PA on 25th
 April, 2022. It has regard to national and regional policies in respect of
 residential development.
- The proposed development site is located in the Main Town of Kinsale in the Greater Cork Ring Strategic Planning Area. Kinsale is identified as a High Order Settlement in the Core Strategy (Table CS 2-7) of the Plan.
- Table 11.3 of the Plan notes that there is a strategic infrastructural deficit in Kinsale's wastewater and indicates that planned development may require further infrastructure investment not provided for on any existing programme and/or EPA license compliance issues.
- Policy Objective WM 11-9 a) in relation to Wastewater Disposal requires that
 development in all settlements connect to public wastewater treatment facilities.
 In settlements where no public wastewater system is either available or
 proposed, new developments will be unable to proceed until adequate
 wastewater infrastructure is provided.
- The site is zoned Existing Residential/Mixed Residential and Other Uses.
- Policy objective KS-GO-01 of Volume 4 of the Plan seeks to plan for development to enable Kinsale to achieve its target population of 6,338 persons.
- Section 1.5.9 of the Plan states that the development strategy for Kinsale is to focus new housing development and population growth close to the existing urban footprint of the town, with a strong focus on the better utilisation of the existing building stock, prioritisation of brownfield and under-utilised land and identification of regeneration and infill opportunities.
- The proposed development site is located in a designated High Value Landscape. Policy Objective GI 14-10 seeks ensure that the management of development throughout the County will have regard for the value of the landscape, particularly in areas designated as High Value Landscapes where higher development standards (layout, design, landscaping, materials used) will be required.

5. Natural Heritage Designations

 The Sovereign Islands SPA (Site Code 004124) is located c. 4km to the southeast of the proposed development site. James Fort pNHA is located c. 750m to the west.

Development, Decision and Grounds of Appeal

6. PA Decision.

The Planning Authority decided to grant permission by Order dated 14th March, 2023 subject to 11no. conditions.

This decision was reached after a Request for Further Information dated 15th August, 2022 and a Request for Clarification of Further Information dated 7th December, 2022 (the response to this request was deemed significant and subject to revised notices).

The planner's report is the basis for the Planning Authority's decision to grant planning permission.

Condition no. 1 requires that the finished floor level be in accordance with the detailed lodged under Planning Register No. 22/5567.

Condition no. 3 states that any dwelling constructed on site shall be of single storey height only.

Condition no. 10 requires that the installation of the treatment unit and percolation area shall be supervised, documented and signed off.

Condition no. 11 requires a maintenance agreement with the supplier of the treatment system.

7. Third Party Appeal.

2no. Third Party appeals have been submitted. These appeals set out the following grounds:

Appeal by Patrick Plunkett and Carol Heaslip

- Observations outlined in previous submissions to the Council were not addressed. It is requested that these matters are addressed by the Board. These include:
 - Haven Hill estate was designed to maximise views of Kinsale
 Harbour for all residents. The proposed development would
 constitute haphazard backfill development. Even a single-storey flat roof build would be obstructive and incongruous to the design and
 aesthetics of the estate.
 - To protect the view, there is an understanding between neighbours that planting and boundaries be kept to a maximum of 2metres in height. Due to the slope of the applicant's site and the height difference between houses to the east and west, overlooking could not be avoided thereby compromising privacy and impacting the enjoyment of neighbouring private garden space.
 - Development on this site would create a negative visual impact from scenic locations in the vicinity.
 - Haven Hill Estate has not been taken in charge by Cork County
 Council due to deficient infrastructural legacy issues, with poor road
 and footpath surface, inadequate ground water drainage, and no
 access to high-speed broadband. The estate services are inadequate
 to cater for any additional dwellings. The roads and footpaths will not
 withstand heavy construction traffic.
 - The road adjoining the site to the north is in private ownership and as such no application can be made to the local authority to grant connection to public services.
 - Although not a designated flood risk zone, both upper and lower Haven Hill estate has been subjected to flooding in the past due to the inadequacy of the rain/storm water drainage. If the site is redeveloped it would remove one of the only green areas of natural soakage. There are no rainwater manholes on the adjoining road, therefore mud will spill downhill during construction.

- In the previous application PA Ref No. 94/2281, the Area Engineer deemed the site works inadequate to cater for an additional dwelling and that permission should be refused.
- The application includes a wastewater treatment plant which raises questions in an estate that is connected to the main sewer, emphasising further the inadequacy of existing services. There are concerns that any malfunctioning of this plant could give rise to effluent discharges downhill.
- Feasibility of electrical supply.
- o RFI items 4 and 5 have not been fully addressed.
- 3d photomontages should be provided to confirm how much of a view will be blocked.
- There is no condition attached to the decision from the Council in relation to the height of the proposed development, or the roof design.
- The site serves as a habitat for wildlife, including foxes and bats, which are protected by legislation.
- In the previous application PA Ref No. 04/2874 for the adjoining site, it was stated that it would be difficult to see how the low sited dwelling could injure the amenities and depreciate the value of property in the vicinity. It was also stated that the dwellings to the east have FFL c. 3m above the proposed dwelling, and would have little or no impact on their view. The constructed dwelling occupies 80% of the width of the Third Party's rear garden. The potential for further devaluation of their property and their enjoyment of their home is of concern. The value of property in Kinsale is inextricably linked to the scenic views. A dwelling in this location was never incorporated into the design and layout of the estate.
- The height of the lower existing dwelling is at odds with what was submitted under PA Ref No. 04/2874.
- Concern is expressed about the height and species of any potential planting to avoid overlooking.

Refusal of permission is requested.

Appeal by Mary Forde

- Cork County Council is premature in granting conditional permission for a
 wastewater treatment plant within the confines of an established residential
 development with a number of houses downstream. The proposed
 development should be connected to the main sewer system.
- The gradient is such that the eave level of the appellant's dwelling is below
 the floor level of the proposed wastewater treatment plant, and far exceeds
 the gradient of 1:8. It was not envisaged that a wastewater treatment plant
 for a single house would be installed in an established residential
 development.

There are 2no. observations on file, and the points raised are of a similar nature to the above grounds of appeal.

Applicant's Response

The applicant response dated 18th April, 2023 states as follows:

- The Council has accepted the proposed development.
- The notification to grant permission includes a condition requiring that the proposed dwelling shall be single-storey.
- The design of the roof will be shown on the detailed planning drawings.
- This is a vacant site in the middle of an established residential estate which
 has been used as a dumping ground and is an eyesore. The site also
 attracts rats. There are more suitable and abundant areas for wildlife.
- The appellants have no legal right to a view, however, it is difficult to see how a single-storey dwelling will impact the appellant's view.
- A landscaping plan will be included with the application for full planning permission.

8. PA Response

The response of the Planner dated 25th April, 2023 states that the PA reiterates

its decision to grant Outline Permission.

Environmental Screening

9. EIA Screening

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

10. AA Screening

Having regard to the modest nature and scale of development, and absence of connectivity to European sites, 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.

2.0 Assessment

- 2.1. Having examined all the application and appeal documentation on file, and having regard to relevant policy, I consider that the main issues which require consideration in this appeal are those raised in the grounds of appeal, and I am satisfied that no other substantive issues arise.
- 2.2. The main issues are as follows:
 - Design of the Proposed Dwelling
 - Drainage and Flooding
- 2.3 Design of the Proposed Dwelling
- 2.3.1 Outline permission is sought for the proposed development which will consist of the construction of 1no. single-storey 4-bed dwelling house, c. 200m2 in area, wastewater treatment plant, new vehicular entrance and all associated site works on a site of c. 0.1843ha in Haven Hill, Summercove, Kinsale, Co. Cork.

- 2.3.2 The proposed development site is a sloping, undeveloped infill site, where there is evidence of dumping of waste, in the established suburban residential area of Haven Hill, in Summercove, to the south-east of Kinsale.
- 2.3.3 Haven Hill is primarily characterised by single-storey semi-detached dwellings. The pattern of development in the immediate vicinity of the site, at a lower level of Haven Hill, is of large single-storey dwellings on individual plots, generally orientated in a north-west/south-east axis, with the front elevation generally facing the estate road, and parking to the side.
- 2.3.4 The proposed dwelling is located at the higher level of the site, with a FFL of 33.5mOD, is also orientated on a north-west/south-east axis, and configured to facilitate adequate distances from existing neighbouring properties to minimise any potential for overlooking. As noted above, the proposed dwelling is sited c. 26.76m from the existing dwelling to the north-east; 33.155m from the existing dwelling to the south-west. The proposed dwelling's location on site, its distance from neighbouring dwellings, and its single-storey height, will also not give rise to overshadowing.
- 2.3.5 I consider the proposed development of a single-storey dwelling that is in keeping with the design and configuration of properties in the vicinity, on an undeveloped, unkempt, zoned, infill site, in an established residential area, within the development boundary of the Ring Town of Kinsale, to be acceptable in principle, and will not result in a negative visual impact in this designated High Value Landscape. For these reasons, it will also not depreciate the value of property in the vicinity.
- 2.3.6 I note the grounds raised with respect to impact on wildlife and biodiversity, but I note no concerns were raised by the PA on this issue in this established residential area.
- 2.4 Drainage and Flooding
- 2.4.1 A key concern raised in the appeals and observations is in relation to the proposal for an individual wastewater treatment plant to service the proposed development in an established residential area, including is location relative to an adjacent dwelling at a lower level.

- 2.4.2 In relation to the proposed onsite wastewater treatment plant, the application states that the reason for not connecting to the main sewer within Haven Hill is because it has no further capacity.
- 2.4.3 The information on file indicates that the existing foul drainage system is in private ownership, is full to capacity, and may even be overloaded. It is stated that only part of Haven Hill has been taken in charge by the PA.
- 2.4.4 I note Policy Objective WM 11-9 a) of the Plan in relation to Wastewater Disposal, which requires that development in all settlements connect to public wastewater treatment facilities, and that in settlements where no public wastewater system is either available or proposed, or where design, capacity or licensing issues have been identified in existing plants, new developments will be unable to proceed until adequate wastewater infrastructure is provided. In this context, I also note that Table 11.3 of the Plan states that there is a strategic infrastructural deficit in Kinsale's wastewater and indicates that planned development may require further infrastructure investment not provided for on any existing programme and/or EPA license compliance issues.
- 2.4.5 I also acknowledge the observations made by the PA Planner in his report on the principle and sustainability of permitting an individual wastewater treatment plant in an established residential area.
- 2.4.6 I further note the planning history of the proposed development site, where outline permission was previously refused for a dwelling on the basis of a lack of services.
- 2.4.7 For these reasons, a refusal of permission on the basis of non-compliance with Policy Objective WM 11-9 a) of the Plan may be warranted.
- 2.4.8 Notwithstanding, I do note the location of the proposed development on an infill site in an established residential area in the Ring Town of Kinsale that is designated for further growth in the Core Strategy of the Plan. I also note Section 1.5.9 of the Plan prioritises brownfield and under-utilised land and identification of regeneration and infill opportunities to accommodate this growth. This infill site in an established residential area is suitable for development.
- 2.4.9 I also note that the existing dwelling to the south-east is serviced by an individual treatment unit, for which permission for retention was granted.
- 2.4.10 The site suitability assessment that accompanies the application states that the site is suitable for a tertiary treatment system and infiltration/treatment area, and

- discharge to groundwater. The Area Engineer also has no objection to the proposed individual treatment plant.
- 2.4.11 On balance, I consider that the servicing of the proposed dwelling by an individual treatment plant to be acceptable. The proposed system will be required to comply with the EPA Code of Practice.
- 2.4.12 The proposed dwelling is to connect to the public mains. Uisce Eireann has advised that a water connection is feasible without infrastructure upgrade. In order to complete the proposed connection, the water network will have to be extended by approximately 20-25m, which will be carried out by Uisce Eireann.
- 2.4.13 Surface water is to be addressed via 2no. soakpits. The Area Engineer has raised no objection to this proposal.
- 2.4.14 Concerns are raised with respect to flooding, but I note that the proposed development site is not located in a Flood Zone. I also note that the Area Engineer raised no concerns with respect to flooding. I also note that no concerns were raised by the Area Engineer with respect to the suitability of the existing estate road to cater for the proposed development.

3.0 **Recommendation**

3.1. I recommend that outline permission for the development be granted for the following reasons and considerations.

4.0 Reasons & Considerations

Having regard to the provisions of the Cork County Development Plan 2022-2028 as they apply to Kinsale, to the undeveloped, infill nature of the proposed development site, and to the pattern of development in the vicinity, it is considered that, subject to compliance with the conditions set out below, the proposed development will not be seriously injurious to existing residential amenities, will not result in a traffic hazard, will not result in a significant visual impact, will not be prejudicial to public health, and will not depreciate the value of property in the vicinity. It is considered that the proposed development is in the interests of the proper planning and sustainable development of the area.

5.0 Conditions

1. This outline permission relates solely to the principle of a detached single storey dwelling on this site only.

Reason: In the interest of clarity.

- 2. The Plans and particulars to be lodged by way of a separate application for permission consequent on this grant of outline permission shall include:
 - (i) a comprehensive site survey, to a scale of not less than 1:500, including contours at intervals of 0.5 metres, showing all existing trees, boundaries and other features,
 - (ii) a site layout plan to a scale of not less than 1:500 showing the layout of the house, driveway and sewage treatment system,
 - (iii) the finished ground floor level of the house by reference to existing site levels and road level at the proposed entrance,
 - (iv) details of external finishes,
 - (v) a detailed landscaping plan for the entire site,
 - (vi) proposals to protect the privacy and amenity of existing adjacent properties, including during the construction phase, and
 - (vii) design proposals which have regard to the design and character of the built environment in the vicinity.

Reason: In the interest of clarity and to enable the application for permission consequent to be fully assessed.

- (a) The proposed effluent treatment and disposal system shall be located, constructed and maintained in accordance with the details submitted to the planning authority on 1st July, 2022, and in accordance with the requirements of the document entitled "Code of Practice Wastewater Treatment and Disposal Systems Serving Single Houses (p.e. ≤ 10)" Environmental Protection Agency, 2021. Arrangements in relation to the ongoing maintenance of the system shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.
 - (b) Within three months of the first occupation of the dwelling, the developer shall submit a report from a suitably qualified person with

professional indemnity insurance certifying that the proprietary effluent treatment system has been installed and commissioned in accordance with the approved details and is working in a satisfactory manner in accordance with the standards set out in the EPA document.

Reason: In the interest of public health.

4. Water supply and drainage arrangements, including the disposal of surface water, shall comply with the requirements of the planning authority for such works and services.

Reason: In the interest of public health.

Cork County Development Plan 2022-2028

Relevant Policies

Volume 1: Main Policy Material

The proposed development site is located in the Main Town of Kinsale in the Greater Cork Ring Strategic Planning Area. Kinsale is identified as a High Order Settlement in the Core Strategy (Table CS 2-7) of the Plan.

Policy Objective CS 2-4 of the Plan seeks to:

- (b) Establish an appropriate balance in the spatial distribution of future population growth, in line with this Core Strategy, so that Bandon, Fermoy, Kinsale, Macroom and Youghal can accelerate their rate of growth and achieve a critical mass of population to enable them to maximise their potential to attract new investment in employment, services and public transport.
- (c) Protect and enhance the natural and built heritage assets of Kinsale to facilitate the development of the town as a Principal Tourist Attraction.

Table 11.3 of the Plan notes that there is a strategic infrastructural deficit in Kinsale's wastewater and indicates that planned development may require further infrastructure investment not provided for on any existing programme and/or EPA license compliance issues. It is further noted that Kinsale's Wastewater Treatment Plant is currently not compliant with Wastewater Discharge License Emission Limit Values set by the EPA. Table D2 of the Plan identifies the upgrade of the Abbeyfort pump station as a key infrastructural requirement for Kinsale.

Section 11.8.8 of the Plan states that a significant upgrade and replacement of water mains in Carrigaline, Mallow, Kinsale, Charleville, Laharan Cross to Abbeys Well, Glantane to Lombardstown, Macroom and Doneraile have been completed.

Section 11.9.3 of the Plan states that in the main settlements, new developments must always connect to a public wastewater treatment system. In this context, Policy Objective WM 11-9 a) in relation to Wastewater Disposal requires that development in all settlements connect to public wastewater treatment facilities subject to sufficient capacity being available which does not interfere with Council's ability to meet the requirements of the Water Framework Directive and the Habitats Directive. In settlements where no public wastewater system is either available or proposed, or where design, capacity or licensing issues have been identified in existing plants,

new developments will be unable to proceed until adequate wastewater infrastructure is provided.

The site is zoned Existing Residential/Mixed Residential and Other Uses. The purpose of this objective is to conserve and enhance the quality and character of established residential communities and protect their amenities. Infill developments, extensions, and the refurbishment of existing dwellings will be considered where they are appropriate to the character and pattern of development in the area and do not significantly affect the amenities of surrounding properties.

The proposed development site is located in a designated High Value Landscape. There are no Protected Structures or Recorded Monuments on the site or in the immediate area. The proposed development site is not located in a Flood Zone.

Section 14.8.9 of the Plan states that within these High Value Landscapes considerable care will be needed to successfully locate large scale developments without them becoming unduly obtrusive. Therefore, the location, siting and design of large-scale developments within these areas will need careful consideration and any such developments should generally be supported by an assessment including a visual impact assessment which would involve an evaluation of visibility and prominence of the proposed development in its immediate environs and in the wider landscape.

GI 14-10 in relation to Draft Landscape Strategy seeks 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.

Volume 4: West Cork

Section 1.5.3 of Volume 4 of the Plan states that future development is focussed on consolidation of the town and limited expansion in order to respect the town's architectural heritage and unique battlefield landscape which contribute to the town's scenic and coastal setting.

Section 1.5.5 states that wastewater in Kinsale is conveyed via a largely combined sewer system to the Kinsale Waste Water Treatment Plant (capacity 3800 p.e.). Extensions of some sewers are required in order to accommodate proposed growth in Kinsale. Kinsale WWTP currently has inadequate spare capacity to accommodate proposed development in Kinsale.

Section 1.5.8 states that Kinsale has been allocated a population target of 6,338 in the Plan representing growth of over 2,000 people on Census 2016 figures. In order to accommodate this level of population growth, an additional 404 housing units will be required. Based on the National Planning Framework's requirement to deliver targeted and compact growth within the built envelope of the town and the Plan's commitment to deliver higher densities, a lower land requirement is now required than in previous plans.

Section 1.5.9 states that the development strategy for Kinsale is to focus new housing development and population growth close to the existing urban footprint of the town to maximize opportunities for walking and cycling within the town and to reinforce its compact urban form. There is therefore a strong focus on the better utilisation of the existing building stock, prioritisation of brownfield and under-utilised land and identification of regeneration and infill opportunities.

Policy objective KS-GO-01 seeks to plan for development to enable Kinsale to achieve its target population of 6,338 persons.

Policy objective KS-GO-02 seeks to Retain the 'green fingers' of land separating the villages of Scilly and Summercove free from development as these are integral to the landscape setting of the town.

Policy Objective KS-GO-04 in relation to the green infrastructure, biodiversity and landscape assets of Kinsale include its coastal habitats, wetlands and woodlands, states that new development should be sensitively designed and planned to provide for the protection of these features 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.

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.

Aiden O'Neill

Planning Inspector

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22nd January, 2024