



An
Bord
Pleanála

Inspector's Report ABP-317514-23

Development	Construction of 24 houses and associated works.
Location	Drakes Point, Knocknagore, Crosshaven, Co.Cork
Planning Authority	Cork County Council
Planning Authority Reg. Ref.	226519
Applicant(s)	O'Flynn Construction Co. Unlimited Company
Type of Application	Permission
Planning Authority Decision	Grant
Type of Appeal	Third Party
Appellant(s)	Michael Fitzgerald
Observer(s)	Dara Fitzpatrick
Date of Site Inspection	04/09/2024
Inspector	Lorraine Dockery

1.0 Site Location and Description

- 1.1 The site, which has a stated area of 1.78 hectares, is located within the settlement boundary of the Crosshaven, Co. Cork, approximately 0.3km to the south of its centre. The site is bounded by Church Road to the west and by the Blindwater and Drake's Point housing developments to the east and south. The northern boundary of the site adjoins a treelined publicly accessible footpath, which runs between Church Road and Crosshaven Tennis Club to the north-east of the site. To the north-west of the site, fronting onto Church Road, lies Holy Trinity Church of Ireland and Templebreedy National School.
- 1.2 There are quite significant level differences across the site. It is currently partly used to store construction materials/dumping, is overgrown and is quite unsightly as one travels along the existing access road, screened in part only by chain-link fencing. In its current state, it significantly detracts from the streetscape at this location. A grove of trees lies within the north-western portion of the site and there is also planting along the eastern site boundary.

2.0 Proposed Development

- 2.1 The proposal comprises the construction of 24 no. terraced, two-storey dwellings consisting of
- 12 x no. 2 bed dwelling houses
 - 12 x no. 3 bed dwelling houses,
- together with all associated ancillary development works.
- 2.2 Vehicular and pedestrian access serving the development will be via the existing access to the Drake's Point housing development (to the south).
- 2.3 Proposed density is 14.1 units/hectare.

3.0 Planning Authority Decision

3.1 Decision

Permission GRANTED, subject to 54 no. conditions

Further Information was requested by the planning authority in relation to (i) Part V (ii) Archaeology (iii) Ecology (iv) Drainage (v) Taking in Charge (vi) Boundary treatments.

Clarification of Further Information was requested by the planning authority in relation to Part V.

3.2 Planning Authority Reports

3.2.1 Planning Reports

- Senior Planner- Reflects decision of planning authority; recommends grant of permission
- Case Planner- Reflects decision of planning authority; recommends grant of permission with conditions

3.2.2 Other Technical Reports

Engineering Section- No objection, subject to conditions (19/04/2023)

Archaeology Section- No further archaeological input required (02/05/2023)

Estates Section- No objection, subject to conditions (16/12/2022)

Ecology Section- No objection, subject to conditions (12/04/2023)

Public Lighting- No objection, subject to conditions (06/12/2022)

Housing Officer- No objection, subject to conditions (29/05/2023)

3.3 Prescribed Bodies

Uisce Eireann: No objections, subject to conditions. Confirmation of Feasibility has issued (dated 19/12/2022)

Inland Fisheries Ireland: Requests that Uisce Eireann signify that there is sufficient capacity in the system so as not to overload either hydraulically or organically existing treatment facilities or result in polluting matters entering waters

3.4 Third Party Observations

The planning authority received a number of observations which raised issues similar to those contained in the third-party appeal.

4.0 Planning History

ABP-307801-20 (19/6562)

Permission GRANTED for the construction of 40 apartments and all associated site works (Decision Date: 03/07/2021).

13/4090

Extension of Duration of permission GRANTED for 48 apartments and associated site works, permitted under PL04.224833.

PL04.224833

Permission GRANTED for 48 apartments and associated site works

5.0 Policy Context

5.1 National Planning Policy

Section 28 Ministerial Guidelines

The following list of section 28 Ministerial Guidelines are considered to be of relevance to the proposed development. Specific policies and objectives are referenced within the assessment where appropriate.

- Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities
- Urban Development and Building Heights, Guidelines for Planning Authorities
- Design Manual for Urban Roads and Streets
- The Planning System and Flood Risk Management (including the associated Technical Appendices)
- Childcare Facilities – Guidelines for Planning Authorities

- Architectural Heritage Protection, Guidelines for Planning Authorities
- Appropriate Assessment Guidelines for Planning Authorities
- Climate Action Plan

Other policy documents of note:

- National Planning Framework
- Regional Spatial & Economic Strategy for the Southern Region

5.2 Local Planning Policy

Development Plan

The Cork County Development Plan 2022-2028 applies.

- Crosshaven and Bays is designated as a 'Key Village'
- Section 1.6.2
- In this plan, Crosshaven and Bays is projected to grow to over 1,500 people during the lifetime of the plan so is treated in a similar manner as regards zoning and land-use to the other main settlements which are over 1,500 people.
- Section 1.8 Crosshaven and Bays
- Zoning: The primary zoning is 'Established Residential/Mixed Residential and Other Uses'. There is a strip of land along the western boundary of the site, adjoining Church Road, which is zoned 'Green Infrastructure' (CS-GR-11), which has an objective to protect woodland area for passive open space use.
- Section 1.8.32
- The majority of this housing will be provided around the existing housing and community facilities available at Crosshaven village. Any new development in the Bays area will be restricted to low density, individual infill development or the appropriate redevelopment or refurbishment of existing dwellings and brownfield sites subject to satisfactory sewage disposal arrangements. Medium and high density development is not considered appropriate for the Bays area.
- There are numerous policies and objectives in the operative Plan that support residential development within existing settlement boundaries
- Objective CS-GO-01- Within the development boundary of Crosshaven and Bays encourage the development of up to 103 additional dwelling units during the plan period

- Objective ZU 18-9- New residential development should normally respect the pattern and grain of existing urban development in the surrounding area
- Objective for a walk/cycle way along the southern boundary of the site
- Located in High Value Landscape- Policy objectives GI 14-9 and GI 14-10 are applicable
- Section 1.8.54
- Templebreedy National School is proposed as a Natural Heritage Area (pNHA-0107), as it supports nursery population of Leisler's Bats (*Nyctalus leisleri*). The attic of the school and the mature trees located nearby, combine to provide an important nursery and habitat
- There are a number of Protected Structures within the vicinity of the site

5.3 Natural Heritage Designation

The nearest designated site- Cork Harbour SPA (Site Code:004030)- is located approximately 0.9 km from subject site.

5.4 EIA Screening

Class (10)(b) of Schedule 5 Part 2 of the Planning and Development Regulations 2001 (as amended) provides that mandatory EIA is required for the following classes of development:

- Construction of more than 500 dwelling units,
- Urban development which would involve an area greater than 2 ha in the case of a business district, 10 ha in the case of other parts of a built-up area and 20 ha elsewhere. (In this paragraph, "business district" means a district within a city or town in which the predominant land use is retail or commercial use.)

The proposed development is for 24 dwellings on a site c. 1.78 ha. The proposed development is considered to be sub-threshold in terms of EIA having regard to Schedule 5, Part 2, 10(b) (i) and (iv) of the Planning and Development Regulations 2001 (as amended). Accordingly, it does not attract the need for a mandatory EIA. The site is located within a designated development area of Crosshaven, on lands zoned for residential purposes. Furthermore, as this proposal would fall below the relevant threshold, I conclude that, based on its nature, size, and location, there is no

real likelihood of significant effects upon the environment and so the preparation of an EIAR is not required.

5.5 Appropriate Assessment Screening

I have considered the proposed development in light of the requirements S177U of the Planning and Development Act 2000 as amended. The subject site is located approximately 0.9 km from the Cork Harbour SPA (Site Code:004030), the nearest designated site. The proposed development comprises the construction of 24 no. dwellings, together with ancillary site development works. There are no open watercourses on, or adjacent to the site. The habitat on site is not suitable for feeding by Qualifying Interest birds.

Having considered the nature, scale and location of the project, I am satisfied that it can be eliminated from further assessment because it could not have any appreciable effect on a European Site. The reason for this conclusion is as follows:

- Nature and scale of works
- Distance from nearest European site and lack of connections
- Taking into account screening determination by the planning authority

I consider that the proposed development would not be likely to have a significant effect individually, or in-combination with other plans and projects, on a European Site and appropriate assessment is therefore not required.

6.0 The Appeal

6.1 Grounds of Appeal

One third-party appeal submission was received, which may be broadly summarised as follows:

- Heritage – proposal will impact/detract from the archaeological landscape including Church of the Holy Trinity on Church Road, listed on NIAH. Also concerns regarding impacts on Crosshaven House and Templebreedy National School

- Need to ensure no ill-conceived development in view of these heritage sites; later remedial action is impossible; negative impacts on hundreds of years of religious devotion and rural development
- Groundwater – concerns for the well on their property, which is used for all water supplies in house and on farm; lack of analysis of water quality; impacts of development on ground water
- Red sandstone prevalent in area; development could cause long-lasting pollution of ground water; risk of saltwater contamination
- Impacts of Trees/Woodlands- impacts of proposal on existing mature trees; methods of protection during construction works; reinstatement of removed trees with similar age trees, not saplings; long-term protection required
- Protected Sites/Species- adjacent to Templebreedy National School pNHA; impacts on Leisler bats; increase in light and noise pollution; interference with bat feeding grounds; NIS should be submitted; timing of surveys; cumulative impacts of building in this area on bats as they have been a decline in bat numbers in Templebreedy National School in recent years
- Deficiency of Sewage Capabilities- inadequate system in place to cater for proposed development
- Other Matters- works being undertaken on other lands; levels on subject site raised since 2010; spread of Japanese knotweed; lack of enforceable conditions in relation to ecology; impacts on character of Crosshaven and surrounding townlands
- Photographs submitted in support of appeal

6.2 Applicant Response

A response was received on behalf of the applicant, which may be broadly summarised as follows:

- Refutes grounds of appeal; appeal similar to objection to PA- these issues were carefully considered and addressed at application stage
- Proposal will not have significant negative impact on nearby Church of the Holy Trinity (RPS 624) or the wider built heritage; development of this site to

complete the wider residential development will provide a positive visual impact on the immediate surroundings; proposal will not obstruct views of Templebreedy Church from the site or from the Church of the Holy Trinity. Due to existing trees, site is barely visibly from Church of Holy Trinity. Will not obstruct views from Templebreedy Church due to distance and topography of wider area. Archaeological Assessment undertaken at application stage and County Archaeologist satisfied with same

- Proposed houses have been carefully located to respond to surrounding context, sensitive to the area
- Proposed water supply, drainage system and wastewater system has been designed to cater for the proposed development; Engineering section of PA have no objections; notes recent investment by Uisce Eireann into Cork Harbour Main Drainage Project; appellants home located c.500m south of the site at a higher level than the subject site therefore extremely unlikely that proposal could impact upon his well
- Proposal designed to cater to existing levels on site; Condition No. 10 of PA decision deals with invasive species management; compliance with this condition will minimise the risk of any invasive species spreading to wider areas; treatment occurred on site in 2022
- Proposal designed to minimise impact on existing trees on site; only 8 trees being removed from site of which 4 are dead/liable to fall and another 3 are decayed/fallen. Surgery recommended by arborist for 10 trees to remove weight, reduce possibility of limb loss etc; PA conditions noted which further reinforce protection of existing trees
- Templebreedy National School is a pNHA and not a SAC as stated in appeal submission; NIS not required for pNHA; previous Inspector's Report notes that proposal would be physically removed from this pNHA so it would not damage this protected site. Proposal is of a smaller scale and similar footprint to previously permitted development, considered that the current proposal would have similar minimal impacts on this protected site
- Several bat and other ecological surveys were completed

- Several enforceable conditions have been attached to the PA grant of permission

6.3 Planning Authority Response

The following response was received:

- PA considers that issues raised in appeal have been assessed in the course of the reports already undertaken in relation to this application. These issues have been covered by various conditions in the schedule. No objection to additional conditions or revision of conditions if considered appropriate by ABP

6.4 Observations

One observation was received which raises issues similar to those contained in the appeal submission. No new material issues raised.

6.5 Further Responses

None

7.0 Assessment

7.1 The proposed development comprises the construction of 24 no. residential units, together with associated site development works. The dwellings are two- and three-bed units, all two-storey in height.

7.2 Having examined the application details and all other documentation on file, including the reports of the planning authority and prescribed bodies, all appeal documentation received and observation received, together with having inspected the site, I consider that the main issues in this appeal are as follows:

- Principle of proposed development/policy context
- Archaeological and Architectural Heritage
- Ecology issues
- Drainage/Capacity issues
- Other matters

Principle of proposed development/policy context

- 7.3 The subject site is located within the settlement boundary of Crosshaven. It is currently an underutilised site, that detracts significantly from the streetscape at this location and would benefit from appropriate regeneration. I would describe it as an infill site, and its appropriate redevelopment would form one of the final pieces of the overall development of this immediate area. The subject site forms part of a larger landholding, owned by the applicants, and this appears to be the last remaining site within that landholding. Access to the site will be from an existing roadway within the Drake's Point residential development. It is stated in the documentation that the proposed development would replace that permitted under ABP-307801-20, as the applicant states that the permitted apartment units are not viable and that there is a much greater demand and need for houses in the area. I note that there are numerous policies and objectives in the operative Plan that support residential development within existing settlement boundaries on infill sites. The subject site is zoned for Established Residential/Mixed Residential and Other Uses. The principle of residential development has been previously established on the site by An Bord Pleanála. There is a recognised need for additional dwellings within the existing footprint of Crosshaven (stated to be 103 in the lifetime of this Plan).
- 7.4 I am satisfied that the principle of residential development is acceptable on this site and that the proposal would aid in achieving targets for residential development within the settlement, while also improving the visual amenity of this underutilised, site within the built-up, urban area. It will read as an extension to the existing residential development within the overall landholding.

Density

- 7.5 I highlight to the Board that this is considered to be a new issue and was not raised in the third-party submissions received. The density of development proposed is 14.1 units/hectare. I note that given the site constraints, namely the woodland to the NW portion of the lands and also that along the eastern site boundary. The applicant in the previous appeal on the site (under ABP-307801-20) states that the woodland in the north-western portion of the site extends over an area of 0.5526 hectares. Omitting that area, would increase the density to approximately 19.55 units/hectare. I consider this figure however not to be a true reflection of the density proposed, in

fact the actual figure is anticipated to be higher given that a further part of the site (along the eastern boundary) is comprised of planting and could reasonably be considered outside of the area for density calculations. The area of this buffer planting along the eastern boundary does not appear to have been cited in the documentation and I am of the opinion that the matter could have been addressed more satisfactorily in the documentations submitted by the applicant by showing the areas not included for density calculations and by further addressing the matter of density. Under ABP-307801-20, I note the net density of development was stated as being 32.58 units/hectare (by my calculations), so the proposal is a reduction in density from that previously permitted on the site.

- 7.6 However, notwithstanding this, I highlight to the Board that a new County Development Plan has been adopted in the interim. Crosshaven continues to be designated as a 'Key Village'. Section 1.8.32 of the operative County Development Plan (2022) states with regards to Crosshaven and The Bays that 'The majority of this housing will be provided around the existing housing and community facilities available at Crosshaven village. Any new development in the Bays area will be restricted to low density, individual infill development or the appropriate redevelopment or refurbishment of existing dwellings and brownfield sites subject to satisfactory sewage disposal arrangements. Medium and high density development is not considered appropriate for the Bays area'. Table 4.1 'Settlement Density Location Guide' of the operative County Development Plan is noted. I note that Medium C density is stated as being 5-20 units/ha. The proposed density would fall into this level, which is stated to be applicable in a limited amount of circumstances. I consider the proposal to be in compliance with section 1.8.32 of the operative Plan.
- 7.7 The Sustainable and Compact Settlement Guidelines for Planning Authorities (2023) are noted, with particular reference to section 3.3.5 Rural Towns and Villages. They do not set out density parameters for such areas. They instead note that these settlements are not identified for significant population growth and that planning authorities should look to promote and support housing that would offer an alternative to persons who might otherwise construct a rural one-off house in the surrounding countryside. I consider this proposal would provide such an alternative.

Having regard to these Guidelines, I consider that the proposal would realise opportunities for infill development, as an extension of previously permitted development and would provide sequential and sustainable housing development at the edge of the settlement at a suitable location, close to the urban core and integrated into the existing built-up footprint. In this instance, the proposal is utilising the existing entrance roadway to the Brightwater development for access to this proposed scheme. I consider the proposal, albeit of a relatively low density, to be tailored to the scale, form and character of the existing settlement. The planning authority are satisfied in relation to the density proposed and consider that the proposed density resembles the pattern and grain of the Brightwater residential estate. They further state that the proposed site is not in a settlement with a high-quality public transport corridor, is not adjoining a town centre zoning and not in a special policy area. The matter of density has not been explicitly raised in the third-party submissions.

- 7.8 Having regard to all of the above I am satisfied with the density proposed and consider it to be in compliance with local and national policy in this regard.

Archaeological and Architectural Heritage

- 7.9 I highlight to the Board that this is one of the main issues raised within the third-party appeal submission.
- 7.10 In relation to heritage, the third-party submissions received raise concerns regarding the impacts of the proposal on the archaeological landscape of the area and also on a number of structures in the vicinity, including Church of the Holy Trinity and Templebreedy Church, together with the nearby pitch and putt and woodland trees of Crosshaven House. I note that the Holy Trinity Church of Ireland (RPS 00642); Crosshaven House (RPS 00644); Templebreedy Rectory (RPS 00967) and Templebreedy National School- original school building (RPS 01390) are all designated as Protected Structures within the operative County Development Plan.

7.11 An Archaeological Assessment was submitted as part of the Further Information response to the planning authority. It states that there are no recorded archaeological monuments within the proposed development site. There are stated to be 18 recorded archaeological sites within approximately 1km radius of the site with the closest being a dovecote (CO099-094), situated c. 170m to the north, which is part of farm buildings associated with Crosshaven House. Both are included in the Record of Protected Structures and are also included in the NIAH. All 18 recorded archaeological sites are set out in Table 1 of the submitted Archaeological Assessment. The area of the proposed development site comprises part of the original demesne of Crosshaven House as shown on the OS 6-inch map of 1842. No structures are named or depicted within the proposed development site.

7.12 Local information indicates topsoil was removed from the proposed development site during the construction of the Brightwater and Drakes Point residential developments in the early 2000s, as it was used as a construction compound for the project. The Archaeological Assessment indicates that a site inspection was undertaken in February 2023. No features or finds of archaeological significance were identified on the proposed development site and there is no evidence that any archaeological remains existed on the site. No original ground levels remain within the site. The substantially disturbed nature of the site is such that it makes it unsuitable for geophysical surveys and archaeological testing. The Assessment concludes that the proposed development will not impact any known archaeological remains and no further archaeological requirements/conditions are recommended. The County Archaeologist of the planning authority states that they are satisfied with the assessment and concur with the recommendations of the report and also consider that no further archaeological input is required.

7.13 I am generally satisfied in this regard. The planning authority have not raised concerns in this regard. There is no response on file from The Heritage Council or DAU, although the file was referred to both bodies. This matter was not raised as a concern in the previous appeal on this site (ABP-307801-20). I am satisfied, that based on the information before me, that the proposal will not have any impacts on the archaeological heritage of the area.

7.14 In terms of the impacts of the proposal in the architectural heritage of the area, including nearby Protected Structures, I note that the proposal before me is of a lesser height and density than that permitted on the site in 2021, while it largely maintains a similar footprint. I am of the opinion that any impacts on the architectural heritage of the area would not be any greater than those associated with the previously permitted development on the site. The Board did not raise concerns in relation to this matter previously. I note the existing and proposed screening on the site, together with the distances from the Protected Structures and consider that any impacts on the character or setting of these Protected Structures would not be so great as to warrant a refusal of permission. I consider that the appropriate redevelopment of this site would significantly improve the visual amenity and streetscape of the area. The planning authority have not raised concerns in this regard. I am generally satisfied in this regard and consider the proposal to be generally in compliance with the operative County Development Plan in relation to architectural heritage (section 16.3), with particular reference to Objective HE16-14 Record of Protected Structures and Objective HE 16-15: Protection of Structures on the NIAH.

Ecology

7.15 This is a matter of concern raised within the third-party appeal submissions namely impacts on trees/woodlands, with particular reference to impacts of the proposal on existing mature trees; methods of protection during construction works and beyond and the opinion that removed mature trees should be replaced with those of similar age, not saplings. A second area of concern relates to protected sites/species-adjacent to Templebreedy National School pNHA, in particular impacts on Leisler bats; increase in light and noise pollution; interference with bat feeding grounds. The third-party contends that a NIS should be submitted and raised concerns in relation to timing of surveys and cumulative impacts of building in this area on bats. They note a decline in bat numbers in Templebreedy National School in recent years.

- 7.16 It is noted that a significant number of documents have been submitted with the application, supplemented by additional documents submitted to the planning authority as part of the Further Information response. These include, inter alia, an EclA and EclA Update, Ecological Addendum, Ecological Mitigation and Monitoring Plan, Woodland Management Plan and Landscape Masterplan. The information contained within these reports appear reasonable and robust. A number of site surveys were undertaken over a number of years.
- 7.17 It is stated in the documentation that the Drake Point woodland (of which the trees on this subject site form part of) is a typical example of a late 18th/early 19th century demesne woodland. It is not native woodland as it is dominated by non-native trees such as beech and sycamore. It is of local importance in terms of habitat quality but is likely to be of much greater significance as bat habitat. It does not require any major management interventions to maintain its current ecological value. It is noted that tree/shrub planting around the existing entrance to the Brightwater is required to restore connectivity for bats. It is also stated that it is proposed to remove 8 trees from the site of which 6 are required for removal due to being decayed/liable to fall. Only 2 trees have been identified for felling as a result of the layout of the proposal, both of which are juvenile Sycamores. In addition, 10 trees require remedial work in the form of tree surgery to reduce weight on crown/concerns during high winds/improve access for future inspection. I again highlight to the Board that proposed development is similar in footprint to that permitted permission by An Bord Pleanála in 2021. I consider that any impacts on trees/woodlands as part of this current proposal would be no greater than that previously permitted.
- 7.18 I am of the opinion that it is inevitable that a development of the nature and scale proposed will result in some loss of habitat/trees. What is important is achieving a balance between the appropriate development of zoned, serviced land within a built-up, urban environment whilst protecting, insofar as possible, the existing natural habitat of the site. In this instance, I consider that an appropriate balance is being achieved. There are no Tree Protection Orders pertaining to this site, although I do acknowledge that it is in a designated High Value Landscape area, as set out in the operative County Development Plan. The matter of tree removal was examined in

ABP-307801-20 and the Board did not express concerns in this regard. I refer the Board to same. The submitted Ecological Impact Assessment Update notes that the footprint of the permitted development and the amended scheme are similar and further states that the amended scheme will not cause any additional tree felling to that specified for the permitted scheme (section 3.1). It states that the lighting plan for the amended scheme will be similar to that permitted and will not cause increased overspill of light into the woodland habitat or treelines and that the landscape plan for the amended scheme includes similar levels of tree planting as was included previously. The report concludes that there will be no material changes to predicted impacts on local bat populations. Plans and information have been submitted setting out how it is proposed to protect existing trees/habitats that are being retained on site. Further Information was requested by the planning authority in this regard and they were satisfied with the response received. The Ecology Section of the planning authority expressed no objections to the proposal, subject to conditions. Appropriate conditions have been attached to the PA grant of permission. The proposal itself has been laid out, such that the proposed structures are located as far as possible away from the woodland area (slightly further away from woodland than that previously permitted). Compensatory planting is proposed. Having regard to all of the above, I am generally satisfied in this regard and that an appropriate balance is being achieved in this instance.

7.19 The third-party appellants also raise concerns, as cited above, in relation to the impacts of the proposal on the bat population. As set out in the operative County Development Plan, Templebreedy National School is proposed as a Natural Heritage Area (pNHA-0107), as it supports nursery population of Leisler's Bats (*Nyctalus leisleri*). The attic of the school and the mature trees located nearby, combine to provide an important nursery and habitat. I note that as approximately 100 bats were recorded at the property in 1987, this is considered a site of international importance. I refer the Board to the Inspector's Report of ABP-307801-20 where a comprehensive assessment of this matter was undertaken. I highlight that the Board did not raise concern in this regard, in that grant of permission (permitted 2021).

7.20 A note at the outset, that the third-party contends that a NIS should be submitted.

Templebreedy National School is proposed as a Natural Heritage Area (pNHA-0107) and not a site designated under the Habitats Directive, the question of NIS does not therefore arise. I highlight to the Board that matters raised relate to ecology only, not to the matter of Appropriate Assessment. Leisler's Bat is not a Qualifying Interest of any designated site. In the interests of clarity, I highlight to the Board that a number of mitigation measures have been included in the various documents attached to the file. In this regard, I am satisfied that the intention of the measures in question, are such, that they were adopted not for the purpose of avoiding or reducing any potential impact on nearby designated sites but were adopted solely and exclusively for some other purpose, namely protecting the ecology at a local level. I am of the opinion that many of the measures are essentially best-practice construction measures and their implementation would be necessary for a housing development on any similar site regardless of the proximity or connections to any Natura 2000 site or any intention to protect a Natura 2000 site. It would be expected that any competent developer would deploy them for works on such similar sites whether or not they were explicitly required by the terms or conditions of a planning permission.

7.21 In addition to the documents referenced above, a Bat Survey Report was also submitted as part of the response to the Further Information request of the planning authority. The EclA Update notes that there will be no material changes to the predicted impacts on local bat populations from that within ABP-307801-20. The appeal submission raises concerns regarding the timing of the bat survey. The initial report was undertaken in 2020. The planning authority raised this matter of Further Information stage and in response, the applicants submitted an updated Bat Survey Report (March 2023), where an additional survey was undertaken in March 2023 to determine the suitability of trees on site to be used by roosting bats. There is an absence of any other suitable features on site to accommodate roosting bats. It is stated in the Bat Survey Report that active bat surveys were not possible but in order to address this deficiency, survey at height was carried out. As a result, absence of bat activity data is not considered to be a significant limitation in this instance. The planning authority Ecologist did not raise concern in this regard. The submitted

Ecological Survey Report indicated that there were no significant changes to the assessment of habitats in the interim since the initial survey was undertaken.

7.22 The above Report states that it takes a conservative view when determining the magnitude of impact significance and a 'suitability' of 'low' is not assigned to any tree, which reflects the fact that any tree with bat potential has the potential to be used at some point or another and the conservation importance of multiple roosting opportunities is poorly understood. This is considered reasonable. The Report concludes that no roosting bats were encountered during tree surveys carried out and no bat roosts are likely to be disturbed as a result of the works, assuming the mitigation measures provided are implemented. Illumination was designed considering wildlife, including bats and is not expected to cause any significant effects on bats- this was raised as an issue in the third-party appeal. The observer states that their own survey in summer has shown the site is used by this protected species in summertime. No survey results appear to have been submitted with this observation. It is stated in the Bat Survey Report, submitted by the applicants, that the loss of bat foraging habitat as a result of the proposed development is not expected to be significant, with mitigation measures outlined. The likelihood of significant potential impacts on the Templebreedy National School pNHA roost, as a result of the proposed development, is low and mitigation measures will be implemented to eliminate the possibility of any potential effects. Overall, the proposed development is considered by the applicants to represent an imperceptible positive impact on bat conservation locally, relative to the do-nothing scenario.

7.23 In terms of cumulative impacts and concerns raised in this regard, it is acknowledged in the documentation that recent development works has interrupted potential commuting routes to/from the woodland and this needs to be remedied, with further acknowledgement that the management of veteran trees within the woodland needs to be sympathetic to their potential use by bats. Proposed actions include tree/shrub planting to fill 75m gap in vegetation corridor that connects the Drake Point woodland to the woodland belt to the north; assessment of all trees for roosting bats prior to any tree surgery being undertaken and development/management of woodland edge habitat which will improve the foraging habitat for bats. Bat mitigation measures

have been set out in the submitted documentation including works taking place during daylight hours only and site not lit during hours of darkness. Any lighting units will not be installed with 10m of existing treelines or woodland habitats and shall be directed away from such sensitive areas. Ecological enhancements are proposed, including a bat box scheme for the provision of 6 no. bat boxes to be installed within the woodland which forms part of the site, which will be monitored for the first autumn after installation.

7.24 I have had regard to all of the information before me in this regard and I acknowledge the concerns expressed by third-parties in this regard. Again, I note the similarities of this current proposal with that permitted under ABP-307801-20 in terms of footprint, distance from woodland habitat and extent of tree/woodland removal. The distance from Templebreedy National School also remains unchanged, approximately 90 NW of the subject site. I note that the Board did not previously raise concerns in this regard, subject to conditions. I note the planning authority were satisfied in relation to this matter, as was the Ecology Section of the planning authority. Specific bat mitigation measures have been put forward in the documentation. The proposal will result in the loss of 8 trees from the site of which 6 are required for removal due to being decayed/liable to fall. This is considered not to be a significant number, given the overall planting within the immediate vicinity. Compensatory planting is proposed. Having regard to all of the above, and having regard to the mitigation measures put forward, I am of the opinion that impacts on the local bat population would not be so great as to warrant a refusal of permission and I consider that the matter can be adequately dealt with by means of condition, if the Board is disposed towards a grant of permission.

7.25 An Outline Invasive Species Management Plan (2023) was submitted as part of the Further Information request by the planning authority. This updates a previous plan for the site, prepared in 2020. Five no. invasive plant species have been identified on the site, with the most widespread species being the Three-cornered Leek. A number of protocols have been set out before starting construction work which will apply to all work within/adjacent to invasive species stands and/or involving the movement/disposal of contaminated material. Control of invasive species will be

undertaken by specialist contractor. The planning authority have not raised concerns in this regard, subject to condition. The Board did not raise concern in relation to this matter in the previous appeal on this site (2021). I am also satisfied in this regard, subject to appropriate conditions being attached to any grant of permission.

7.26 I highlight to the Board that the occurrence of a badger sett in the woodland along the western margin of the site is a material change since the 2020 assessment. This is stated to be an outlier sett with a single active entrance and the entrance did not have significant accumulations of spoil, so it is unlikely to have a long tunnel system. Having regard to the information ascertained by the applicants in their surveys, a 20m buffer was considered sufficient to protect the sett. A number of mitigation measures have been outlined. The planning authority have not raised concerns in this regard. This matter was not raised as a specific concern in the appeal submission. I am also satisfied that the matter could be adequately dealt with by means of condition.

7.27 Having regard to all of the above, I am satisfied that there will be minimal impacts on ecology, over and above that previously permitted by the Board under ABP-307801-20 and I am satisfied in this regard, subject to conditions.

Drainage/Capacity Issues

7.28 The third-party appeal raises concerns in relation to groundwater, specifically concerns for the well on their property, which is used for all water supplies in their house and on their farm. They cite a lack of analysis of water quality and express concerns that the proposed development could cause long-lasting pollution of ground water. The appeal further raises concerns regarding deficiency of sewage capacity, and they consider that there is an inadequate system in place to cater for proposed development. The matter of saltwater contamination is also raised. The first-party refute these claims and state that the proposed water supply, drainage system and wastewater system has been designed to cater for the proposed development; they note that the Engineering section of PA have no objections to the

proposal and highlight the recent investment by Uisce Eireann into Cork Harbour Main Drainage Project. They also state that given that the appellants home is located c.500m south of the site at a higher level than the subject site, they contend that it is therefore extremely unlikely that proposal could impact upon his well.

7.29 I note that an Infrastructure Report was submitted with the application documentation. A Drainage Impact Assessment was submitted as part of the Further Information response to the planning authority and they were satisfied with this assessment. The Engineering Report of the planning authority expresses no objections to the proposal, subject to conditions. Capacity issues have not been raised as a concern by the planning authority. The site is not located within a flood zone. There are no open watercourses on the site. I note the distance of the appellants property from the subject site and concur with the opinion of the first-party that the proposal is unlikely to have significant impacts on their well. I note the report of Uisce Eireann, which has issued a Confirmation of Feasibility subject to conditions and has stated that they have no objections to the proposal, subject to conditions. Inland Fisheries Ireland did not object to the proposed development and their report is noted. The operative County Development Plan states that Crosshaven has capacity for 103 further dwellings during the lifetime of the Plan. Capacity of services would have been taken into account by the planning authority in arriving at this figure. I note that the Board did not raises concerns in this regard, in the previous decision on the site (ABP-307801-20). I have no information before me to believe that the proposal would be prejudicial to public and I am generally satisfied in this regard, subject to conditions.

Other Matters

7.30 It is noted the some of the documents submitted were prepared for the development, permitted under ABP-307801-20, and reference is made to that development therein. In many instances they have been updated where necessary or relevant. The submission of these documents and reference to previous development contained therein does not impact upon the outcome of my recommendation.

7.31 Several of the concerns raised in the appeal submission relate to previously permitted and now constructed development and are not considered relevant to this current appeal. Application 17/5556 did not include the subject site. Any matters of

non-compliance with previous conditions or perceived unauthorised works are a matter for the enforcement section of the planning authority.

Conclusion

- 7.32 I am generally satisfied with the remainder of the proposal, subject to compliance with conditions. The proposal will represent an attractive addition to the urban fabric at this location, while protecting and enhancing the character and heritage of the wider area. It will also contribute to the residential mix in the area, in accordance with the zoning objective for the area, and will integrate well with existing and permitted development in the vicinity. Materiality is good and the proposal will provide attractive spaces, with a quality landscaping scheme put forward. Given the height and design of the proposed residential units, I am of the opinion that the proposed houses would not unduly overbear or overlook adjoining properties and would not seriously injure the amenities of property in the vicinity of the site. There is an acknowledged housing crisis and this is a serviceable site, in an established urban area, where there are adequate services, facilities and employment in close proximity.
- 7.33 Overall, the proposed development is located on a site identified for residential development and the Board has previously accepted the principle of residential development on it. Having regard to the layout, height and design solution put forward, I am satisfied that the proposed development is in accordance with the zoning objective of the Development Plan, is in keeping with the pattern of development in the area and is in accordance with the proper planning and sustainable development of the area.

8.0 Recommendation

- 8.1 I recommend that the decision of the planning authority be UPHELD and that permission be GRANTED, subject to the following conditions.

9.0 Reasons and Considerations

Having regard to the pattern of development in the area and its residential zoning under the Cork County Development Plan 2022-2028, it is considered that, subject to

compliance with conditions below, the proposed development would provide a high-quality residential development on an underutilised site; would not seriously injure the character and heritage of the area or the amenities of property in the vicinity and would provide an adequate standard of residential amenity to future occupiers. The proposed development would, therefore, be in accordance with the proper planning and sustainable development of the area.

10.0 Conditions

1.	<p>The development shall be carried out and completed in accordance with the plans and particulars lodged with the application, as amended by the further plans and particulars received by the planning authority on the 31st day of March 2023 and 17th day of May 2023, except as may otherwise be required in order to comply with the following conditions. Where such conditions require details to be agreed with the planning authority, the developer shall agree such details in writing with the planning authority prior to commencement of development and the development shall be carried out and completed in accordance with the agreed particulars.</p> <p>Reason: In the interest of clarity.</p>
2.	<p>Prior to commencement of development, the developer shall submit to the planning authority a single schedule of ecological proposals as detailed in the Ecological Impact Assessment Report, Bat Surveys, Ecological Mitigation and Monitoring Plan, Outline Invasive Species Management Plan and the various plans/assessments and updates submitted with the application. The schedule shall set out the timeline for implementation of each proposal and assign responsibility for implementation. All of the proposals shall be implemented in full and within the timescales stated.</p> <p>In this regard:</p> <ul style="list-style-type: none"> a. The applicant shall appoint and retain the services of a qualified ecological consultant for the duration of the development. The consultant shall ensure that the mitigation measures recommended

	<p>are implemented in full.</p> <p>b. Removal of scrub, hedgerows and trees shall only take place outside the bird breeding season (March 1st- August 31st)</p> <p>c. All trees/hedgerow proposed for felling shall be examined for evidence of bats, prior to any works by a bat specialist. If required, an NPWS derogation licence shall be obtained. An operational stage tree management plan for bats shall also be submitted.</p> <p>d. The applicant shall appoint a bat ecologist to carry out a bat survey, during the appropriate period, prior to commencement of development on site and to determine if a derogation licence for bats would be required. The bat survey shall include a range of trees and buildings by several surveyors on several nights. The bat ecologist shall also review the engineer's lighting plan for the development and make such recommendations for adjustments to the plan as necessary to mitigate light spill on feeding bat habitats</p> <p>e. After installation of the external lighting, a report shall be submitted, prepared by the bat specialist, for the written satisfaction of the planning authority, confirming that it is operating according to specification</p> <p>Reason: In the interests of clarity, protection of the environment and the proper planning and sustainable development of the area.</p>
3.	<p>Prior to commencement of development, the developer shall submit to the planning authority for their written agreement:</p> <p>(a) Details of proposed boundary treatments. All palisade fencing shall be replaced by a fencing of a more decorative nature. All blockwork walls shall be suitably capped and rendered</p>

	<p>(b) Details of how it is proposed to landscape and maintain the area between Units No. 16 and 17</p> <p>(c) Phasing Plan</p> <p>Reason: In the interests of clarity and the proper planning and sustainable development of the area</p>
4.	<p>Prior to the commencement of development on site, the applicants shall ascertain and comply with all requirements of the planning authority with regards to the eradication of invasive species from the site.</p> <p>In this regard, the applicants shall also submit an assessment and method statement on how best to deal with invasive species contaminated material on site to the planning authority, for their written agreement, prior to the commencement of any works on site. The method statement shall provide details of the buffer zones, nominated authorised waste collector and on-going treatment programme. The works shall be carried out under the supervision of an invasive species specialist, who shall monitor all site investigations and other works and who, on completion shall submit a report certifying that the removal process of invasive species is satisfactory.</p> <p>Reason: In the interests of environmental protection and orderly development</p>
5.	<p>Details of the materials, colours and textures of all the external finishes to the proposed development shall be submitted to, and agreed in writing with, the Planning Authority prior to commencement of development.</p> <p>Reason: In the interest of visual amenity.</p>
6.	<p>Each residential unit shall be used as a single dwelling unit only and shall not be sub-divided in any manner or used as two or more separate habitable units.</p>

	<p>Reason: In the interests of sustainable development and proper planning</p>
7.	<p>The developer shall comply with all requirements of the planning authority in relation to roads, access, lighting and parking arrangements, including facilities for the recharging of electric vehicles. In particular:</p> <p>(a) The roads and traffic arrangements serving the site (including signage) shall be in accordance with the detailed requirements of the Planning Authority for such works and shall be carried out at the developer's expense.</p> <p>(b) The roads layout shall comply with the requirements of the Design Manual for Urban Roads and Streets, in particular carriageway widths and corner radii;</p> <p>(c) The materials used in any roads / footpaths provided by the developer shall comply with the detailed standards of the Planning Authority for such road works,</p> <p>A detailed construction traffic management plan shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development. The plan shall include details of arrangements for routes for construction traffic, parking during the construction phase, the location of the compound for storage of plant and machinery and the location for storage of deliveries to the site.</p> <p>Reason: In the interest of traffic safety and convenience.</p>
8.	<p>The proposed development shall make provision for the charging of electrical vehicles. All car parking spaces serving the development shall be provided with electrical connections, to allow for the provision of future charging points and in the case of 10% of each of these spaces, shall be provided with electrical charging points by the developer. Details of how it is proposed to comply with these requirements, including details of design of, and signage for, the electrical charging points and the provision for the operation and maintenance of the charging points shall be submitted to,</p>

	<p>and agreed in writing with, the planning authority prior to commencement of development.</p> <p>Reason: in the interests of sustainable transportation</p>
9.	<p>Site development and building works shall be carried out only between the hours of 0700 to 1900, Mondays to Fridays inclusive, between 0800 to 1600 hours on Saturdays and not at all on Sundays and public holidays. Deviation from these times will only be allowed in exceptional circumstances where prior written approval has been received from the planning authority.</p> <p>Reason: In order to safeguard the residential amenities of property in the vicinity.</p>
10.	<p>Drainage arrangements including the attenuation and disposal of surface water, shall comply with the requirements of the relevant Section of the planning authority for such works and services. Prior to the commencement of development the developer shall submit to the planning authority for written agreement a Stage 2 - Detailed Design Stage Storm Water Audit. Upon completion of the development a Stage 3 Completion Stormwater Audit to demonstrate Sustainable Urban Drainage System measures have been installed, and are working as designed and that there has been no misconnections or damage to storm water drainage infrastructure during construction, shall be submitted to the planning authority for written agreement.</p> <p>Reason: In the interest of public health and surface water management</p>
11.	<p>to the commencement of development the developer shall enter into a Connection Agreement (s) with Uisce Éireann (Irish Water) to provide for a service connection(s) to the public water supply and/or wastewater collection network.</p>

	<p>Reason: In the interest of public health and to ensure adequate water/wastewater facilities.</p>
12.	<p>The site shall be landscaped in accordance with the detailed comprehensive scheme of landscaping, which accompanied the application submitted, unless otherwise agreed in writing with, the planning authority prior to commencement of development. The developer shall retain the services of a suitably qualified Landscape Architect throughout the life of the site development works. The approved landscaping scheme shall be implemented fully in the first planting season following completion of the development or each phase of the development and any plant materials that die or are removed within 3 years of planting shall be replaced in the first planting season thereafter.</p> <p>Reason: To ensure a satisfactory completion and maintenance of the development in the interests of residential amenity and in the interests of protecting the environment</p>
13.	<p>Public lighting shall be provided in accordance with a scheme, which shall include lighting along pedestrian routes through open spaces, details of which shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development/installation of lighting.</p> <p>Reason: In the interests of amenity and public safety</p>
14.	<p>All service cables associated with the proposed development (such as electrical, telecommunications and communal television) shall be located underground. Ducting shall be provided by the developer to facilitate the provision of broadband infrastructure within the proposed development..</p> <p>Reason: In the interest of visual and residential amenity.</p>
15.	<p>Proposals for an estate/street name, house numbering scheme and</p>

	<p>associated signage shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development. Thereafter, all estate and street signs, and house numbers, shall be provided in accordance with the agreed scheme. [The proposed name(s) shall be based on local historical or topographical features, or other alternatives acceptable to the planning authority]. No advertisements/marketing signage relating to the name(s) of the development shall be erected until the developer has obtained the planning authority's written agreement to the proposed name(s).</p> <p>Reason: In the interest of urban legibility [and to ensure the use of locally appropriate placenames for new residential areas].</p>
16.	<p>The construction of the development shall be managed in accordance with a Construction and Environmental Management Plan, which shall be submitted to, and agreed in writing with the planning authority prior to commencement of development. This plan shall provide, inter alia: details and location of proposed construction compounds, details of intended construction practice for the development, including hours of working, noise and dust management measures, details of arrangements for routes for construction traffic, parking during the construction phase, and off-site disposal of construction/demolition waste.</p> <p>Reason: In the interests of public safety and residential amenity.</p>
17.	<p>Construction and demolition waste shall be managed in accordance with a construction waste and demolition management plan, which shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development. This plan shall be prepared in accordance with the "Best Practice Guidelines on the Preparation of Waste Management Plans for Construction and Demolition Projects", published by the Department of the Environment, Heritage and Local Government in July</p>

	<p>2006.</p> <p>Reason: In the interest of sustainable waste management.</p>
18.	<p>(a) A plan containing details for the management of waste (and, in particular, recyclable materials) within the development, including the provision of facilities for the storage, separation and collection of the waste and, in particular, recyclable materials and for the ongoing operation of these facilities shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development. Thereafter, the waste shall be managed in accordance with the agreed plan.</p> <p>(b) This plan shall provide for screened communal bin stores, the locations and designs of which shall be included in the details to be submitted.</p> <p>Reason: To provide for the appropriate management of waste and, in particular recyclable materials, in the interest of protecting the environment.</p>
19.	<p>If, during the course of site works any archaeological material is discovered, the City/County Archaeologist/Planning Authority shall be notified immediately. The applicant/developer is further advised that in this event that under the National Monuments Act, the National Monuments Service, Dept. of Housing, Heritage and Local Government and the National Museum of Ireland require notification.</p> <p>Reason: In the interest of preserving or preserving by record archaeological material likely to be damaged or destroyed in the course of development.</p>
20.	<p>Prior to commencement of development, the applicant or other person with an interest in the land to which the application relates shall enter into an agreement in writing with the planning authority in relation to [the transfer of [XX]% of the land in accordance with the requirements of section 94(4) and section 96(2) and 96(3)(a), (Part V) of the Planning and Development Act</p>

	<p>2000, as amended, and/or the provision of housing on the land in accordance with the requirements of section 94(4) and section 96(2) and 96(3) (b), (Part V) of the Planning and Development Act 2000, as amended], unless an exemption certificate has been granted under section 97 of the Act, as amended. Where such an agreement cannot be reached between the parties, the matter in dispute (other than a matter to which section 96(7) applies) shall be referred by the planning authority or any other prospective party to the agreement, to An Bord Pleanála for determination.</p> <p>Reason: To comply with the requirements of Part V of the Planning and Development Act 2000, as amended, and of the housing strategy in the development plan for the area.</p>
21.	<p>The management and maintenance of the proposed development following its completion shall be the responsibility of a legally constituted management company, or by the local authority in the event of the development being taken in charge. Detailed proposals in this regard shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.</p> <p>Reason: To ensure the satisfactory completion and maintenance of this development.</p>
22.	<p>Prior to the commencement of any house in the development as permitted, the applicant or any person with an interest in the land shall enter into an agreement with the planning authority (such agreement must specify the number and location of each housing unit), pursuant to section 47 of the Planning and Development Act, 2000, that restricts all houses permitted, to first occupation by individual purchasers i.e. those not being a corporate entity, and/or by those eligible for the occupation of social and/or affordable housing, including cost rental housing.</p>

	<p>Reason: To restrict new housing development to use by persons of a particular class or description in order to ensure an adequate choice and supply of housing, including affordable housing, in the common good.</p>
23.	<p>Prior to commencement of development, the developer shall lodge with the planning authority a cash deposit, a bond of an insurance company, or other security to secure the provision and satisfactory completion of roads, footpaths, watermains, drains, open space and other services required in connection with the development, coupled with an agreement empowering the local authority to apply such security or part thereof to the satisfactory completion of any part of the development. The form and amount of the security shall be as agreed between the planning authority and the developer or, in default of agreement, shall be referred to An Bord Pleanála for determination.</p> <p>Reason: To ensure the satisfactory completion of the development.</p>
24.	<p>The developer shall pay to the planning authority a financial contribution in respect of public infrastructure and facilities benefiting development in the area of the planning authority that is provided or intended to be provided by or on behalf of the authority in accordance with the terms of the Development Contribution Scheme made under section 48 of the Planning and Development Act 2000, as amended. The contribution shall be paid prior to commencement of development or in such phased payments as the planning authority may facilitate and shall be subject to any applicable indexation provisions of the Scheme at the time of payment. Details of the application of the terms of the Scheme shall be agreed between the planning authority and the developer or, in default of such agreement, the matter shall be referred to An Bord Pleanála to determine the proper application of the terms of the Scheme.</p> <p>Reason: It is a requirement of the Planning and Development Act 2000, as amended, that a condition requiring a contribution in accordance with the</p>

	Development Contribution Scheme made under section 48 of the Act be applied to the permission.
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Note: The applicants are advised to note section 34(13) of the Planning and Development Act, 2000 (as amended) which states that a person shall not be entitled solely by reason of a permission to carry out any development.

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.

Lorraine Dockery
Senior Planning Inspector

10th September 2024

EIA Preliminary Examination- Form 2

An Bord Pleanála Case Reference	ABP- 317514-23	
Proposed Development Summary	Construction of 24 no. residential units and all associated ancillary development work.	
Development Address	Drakes Point, Knocknagore, Crosshaven, Co.Cork	
<p>The Board carried out a preliminary examination [ref. Art. 109(2)(a), Planning and Development regulations 2001, as amended] of at least the nature, size or location of the proposed development, having regard to the criteria set out in Schedule 7 of the Regulations.</p> <p>This preliminary examination should be read with, and in the light of, the rest of the Inspector's Report attached herewith.</p>		
	Examination	Yes/No/ Uncertain
<p>Nature of the Development. Is the nature of the proposed development exceptional in the context of the existing environment.</p> <p>Will the development result in the production of any significant waste, emissions or pollutants?</p>	<p>Not exceptional in the context of the existing environment. Infill, brownfield site. Zoned, serviceable site within built-up area of Crosshaven.</p>	<p>No</p> <p>No</p>
<p>Size of the Development Is the size of the proposed development exceptional in the context of the existing environment?</p> <p>Are there significant cumulative considerations having regard to other existing and / or permitted projects?</p>	<p>Size of the proposed development is not exceptional in the context of the existing environment. Development of 24 units within existing, built-up area. Using existing infrastructure</p>	<p>No</p> <p>No</p>
<p>Location of the Development Is the proposed development located on, in, adjoining, or does it have the potential to significantly impact on an ecologically sensitive site or location, or protected species?</p> <p>Does the proposed development have the potential to significantly</p>	<p>proposed development is no located on, in, adjoining, or does it have the potential to significantly impact on an ecologically sensitive site or location, or protected species. Mitigation measures proposed to protect local ecology.</p>	<p>No</p>

affect other significant environmental sensitivities in the area, including any protected structure?	No PS on site. No protected species/habitats on site	
Conclusion		
There is no real likelihood of significant effects on the environment. EIA is not required.		

Inspector: Lorraine Dockery

Date: 10th September 2024