



An  
Bord  
Pleanála

## Inspector's Report ABP-317615-23

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<b>Development</b>	6 no. 18 metre high poles with associated light fittings, 2 no. ball stop nets and associated site works, retention of fencing, retaining structures, dugouts, pedestrian gate/steps, vehicular entrance gate and pillars.		
<b>Location</b>	Philipstown, Dunleer, County Louth		
<b>Planning Authority Ref.</b>	22833		
<b>Applicant</b>	St. Kevins GAA Club		
<b>Type of Application</b>	Permission & Retention	<b>PA Decision</b>	Grant Permission & Grant Retention
<b>Type of Appeal</b>	Third Party v Grant	<b>Appellant</b>	Andrew Davidson
<b>Observer(s)</b>	None		
<b>Date of Site Inspection</b>	23 <sup>rd</sup> September 2023	<b>Inspector</b>	Ian Campbell

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## **1.0 Site Location/and Description.**

The appeal site is located on the southern side of the L2250 in Philipstown, Dunleer, Co. Louth. The appeal site accommodates a GAA club, including a clubhouse/community centre, changing rooms, all-weather pitch (floodlit), 2 no. playing pitches (one of which is floodlit), walking track and associated car parking. St. Kevin's National School is located to the west of the appeal site. A detached dwelling is situated to the south.

## **1.1 Proposed development.**

The proposed development consists of;

- Permission for:
  - 6 no. 18 metre high poles with associated light fittings (5 no. luminaires per pole).
  - 2 no. retractable ball stop nets (28 metre high x 13 metre wide).
  - associated site works.
- Retention Permission<sup>1</sup> for:
  - fencing, retaining structures, dugouts, pedestrian gate/steps, vehicular entrance gate and pillars (replacing previous vehicular entrance) all situated along the eastern boundary of the site.

## **1.2 PA's Decision.**

FI Request: Prior to the decision of the Planning Authority to grant permission and retention for the proposed development, the Planning Authority requested Further Information. The applicant was requested to submit;

- (1) Revised site layout plan and drawings of the proposed floodlights, with sufficient contextual detail, including reference to the dwelling to the south, and an illumination plan indicating contextual details.
- (2) Address the concerns raised in the third party observation, provide a justification for the proposal and consider any revisions which may be appropriate.

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<sup>1</sup> Following a request for Further Information the extent of the proposed development was amended to include development carried out along the eastern boundary of the site. Revised public notices were submitted in accordance with Article 35 of the Planning and Development Regulations, 2001, as amended.

- (3) (a) Confirm whether the illumination plan has had regard to works undertaken to the boundary hedgerow between the proposed development and the dwelling to the south, including changes in ground levels. (b) Confirm that the extent of light spillage to adjoining property or the public road is not significant in the context of the amenity of adjoining property, or that it would not result in a traffic hazard.
- (4) Confirm intended frequency of use of proposed floodlights, and whether it is intended to be used to light the walking track.
- (5) Address the carrying out of works along the eastern boundary of the site, which include the erection of fencing, retaining structures, dugouts, steps, new entrance gates and pillars, and the associated loss of vegetation at this location, as the PA are precluded from permitting development where it consolidates unauthorised development.
- (6) Readvertise public notices in accordance with Art. 35 of the Planning and Development Regulations, 2001, as amended (if necessary).

The applicant submitted a response to the PA on the 1<sup>st</sup> June 2023 including, a justification report for the proposal; confirmation that the floodlights will be used 2-3 nights per week between 8pm - 9.30pm in January and February, and approximately once per week during the months of March, April, September and October between 8pm and 9.30pm, and will not be used to light the walking track; and an updated lighting design report and LUX details to include the wider area/adjacent property. The response included the works which had been carried out along the eastern site boundary.

Decision: The Planning Authority issued a Notification of Decision to GRANT permission on the 21<sup>st</sup> June 2023 subject to 8 no. conditions. The following conditions are considered pertinent;

**C5** – side entrance shall not be used by the general public, unless in emergency circumstances.

**C6** – flooding shall be designed, constructed and maintained to prevent light spill to adjacent roads and property, as per specifications prepared by Molloy Consulting Engineers (dated 4<sup>th</sup> April 2023).

**C7** – floodlighting shall not be operational after 10pm.

**C8** – planting shall be carried out in first planting season, in accordance with details received on the 1<sup>st</sup> June 2023 (*Drawing No. StK/22/01/-A*).

Report(s) of PA: In addition to reflecting the issues raised in the Further Information request, the initial report of the Planning Officer notes that the principle of the development is acceptable, and that no amenity issues are anticipated in respect of proposed ball catching nets.

The second report notes that the level of detail indicated on the drawings submitted is acceptable; that the map indicating light spill shows minimal light spill to the dwelling to the south; that measures have been taken to mitigate light spill, and that the proposal will not have an unacceptable impact on neighbouring property or traffic safety, that the hedgerow along the south site boundary is mostly intact, with new planting at the location of the gaps on the appellant's side; that the works proposed to be retained are considered acceptable; that visibility is acceptable at the side entrance; that issues concerning unauthorised development falls outside the scope of the application; that the walking track is exempt development, and that no concerns arise in respect of the use of the walking track, which will be incidentally lit by the proposed floodlights.

Infrastructure Section – recommends conditions in relation to obtaining a road opening licence, repair of footpath/roadway and maintaining the area free of debris.

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

Observations to PA;

2 no. observations were received in respect of the initial application. Issues raised in the observations are summarised by the PA as follows;

- Support for proposed development (Peter Fitzpatrick TD).
- Concerns regarding impact from glare to rooms in adjacent property and rear garden, accuracy of drawings/details submitted, road safety concerns, encroachment of application site into observer's property, and that the proposal is out of context with character of area.

1 no. observation was received by the PA in respect of the Further Information. Issues raised in this observation are summarised by the PA as follows;

- Proposal encroaches on property to south, impact of floodlighting on residential amenity of property to south, lack of screening along southern site boundary, details of observer's property are inaccurate, use of portable generators within site, planning status of walking track, impact of floodlights on road users, intended time/days of use queried and concerns regarding the illumination of the walking track.

### **1.3 Planning History.**

Appeal Site (relevant and recent):

**PA. Ref. 04/813** – Permission GRANTED for all weather pitch and 6 no. 8 metre high floodlights.

**PA. Ref. 07/1728** – Permission GRANTED for training pitch.

**PA. Ref. 11/230** – Permission GRANTED for new clubrooms/community centre.

**PA. Ref. 18/812** – Permission sought for 6 no. 20 metre high floodlights to main pitch. (application withdrawn).

### **1.4 Planning Policy**

Development Plan - The relevant Development Plan is the Louth County Development Plan 2021-2027. The appeal site is not subject to any specific land-use zoning but is located within the settlement boundary of Philipstown Rural Node (see Map 5.17, Volume 2, Section 3, Louth County Development Plan 2021 – 2027).

The provisions of the Louth County Development Plan 2021 – 2027 relevant to this assessment are as follows:

Chapter 4 (Social & Community)

- Policy Objective SC20

Chapter 13 (Development Management Guidelines)

- Table 13.13 (Minimum Visibility Standards for New Entrances)

### **1.5 Natural Heritage Designations**

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

## **1.6 The Appeal**

### **1.6.1 Third Party**

This is a third-party appeal by Andrew Davidson against the decision to grant permission and retention permission. The grounds for appeal may be summarised as follows;

- The proposed development would seriously injure the residential and visual amenities of the area.
- The hedgerow along the southern boundary of the site contains gaps resulting in the appellant's property being visible from the pitch. The PA's assessment gives inappropriate weighting to the screening which this hedgerow provides.
- The report undertaken by Molly Consulting Engineering is desk based.
- The proposed retaining structure and fence is visually obtrusive, overbearing and inappropriate at this rural location. Proposed planting along the eastern boundary of the site is not comparable to the planting which previously existed at this location. The landscape plan for this location is inadequate.
- The red line boundary of the site is inaccurate and appears to encroach on the appellant's property. Works and planting appear to be within the appellant's property.
- A number of planning conditions are inappropriate, specifically Condition no. 6 (as it relies on the specifications from Molloy Consulting Engineers report, prepared on foot of a desk based study); Condition no. 7 (as it allows for the floodlights to be used 7 days a week, despite the applicant stating that the floodlighting is not required during certain months); and Condition no. 8 (as it is of no effective purpose and allows floodlights to be used prior to the proposed planting).
- There are already unacceptable amenity impacts from existing floodlights and generators at the juvenile pitch, which are unauthorised.
- The existing walking track has adverse impacts on the appellant's property.
- The proposal will result in the devaluation of the appellant's property as a result of the levels of lighting.
- The scale of the floodlights and the works along the eastern boundary of the site will harm the amenity of the area.

- The PA have not assessed the proposed pedestrian gate, which poses a traffic hazard to pedestrians and vehicles.

### **1.6.2. Applicant Response**

The applicant has submitted a response in respect of the third party appeal submission.

- The club has been established at the site for over 40 years.
- The Board should consider the applicant's response alongside Outdoor Lighting Report 2 (attached to submission). This report notes;
  - There are no bedroom windows facing the nearest lighting column. Should there be a window on the north elevation the average LUX would be 0.42. As the full moon has a LUX of 1, light spill from the column would effectively be 0. The sunroom will be situated further away than the blank gable. Anything below an average LUX of 5 would be deemed acceptable in a rural area.
  - Philips have lit the pitch the lowest possible class that GAA can comfortably be played under. Louvered fittings are proposed.
  - The lighting study is based on a software calculation because the lighting has not yet been installed. The experience of the lighting engineer is that when light emitted from floodlights is measured in operation it is effectively the same as the values which were calculated by the software.
  - The initial lighting report was not inadequate, it was prepared with reference to software calculations and technical standards ILP Guidance Note 01/21 The Reduction of Obtrusive Light and CIE 150:2017.
  - The appellant's photographs taken of light from a dark area are not evidence of light spill, which must be calculated using a LUX metre.
- The main pitch has been served by floodlighting since 1991, with 7 no floodlights serving the main pitch. The floodlights were removed in 2018 when improvement works were carried out however it was always intended to reinstate floodlights at the main pitch.

- The applicant had previously applied for permission for 6 no. 20 metre high floodlights (see PA. Ref. 18/812). This application was subject to a request for Further Information and was deemed withdrawn. The height of the floodlights under the current proposal are 2 metres lower compared to that as proposed under PA. Ref. 18/812 in an attempt to address the concerns of the appellant. It is noted that the further lowering of the floodlights would not reduce the glare, could in fact result in greater light spill and would require 4 no. columns on each side of the pitch to compensate for loss of light.
- The appellant purchased his property around 2013. There were floodlights at the pitch at the time the appellant purchased his house. The appellant purchased his home next to a GAA club served by floodlights.
- The gable wall of the appellant's house is blank. The sunroom is a projection from the southern side of the rear elevation. The garage is positioned between the sunroom and the proposed lighting column.
- It is proposed (as per the FI submission) to provide additional planting along the southern site boundary to address the appellant's concerns.
- The retaining structure along the eastern site boundary is 97 metres, and not 140 metres as suggested. Planting along this boundary is in line with Development Plan policy in terms of species, spacing and timings. A retaining wall at this location is required. Planting along the eastern site boundary will soften the appearance of the wall and fence once completed, and will continue to improve over time.
- There is no substance to the appellant's claims that the boundary of the site encroaches onto the appellant's site, details of Folio LH307788F (attached) indicates this. No works or planting are proposed within the appellant's property.

### **1.6.3. Further Responses**

The appellant has submitted a response in respect of the first party response to the third party appeal submission. The issues raised are summarised below.

- Floodlighting was not in place when the appellant bought his property.



- Floodlighting referred to at the main pitch, which was of a smaller scale, did not have planning permission and their use has since been abandoned. Screening at the pitch has also been reduced in the intervening period.
- Hedgerow along southern site boundary is sparse during winter.
- Bedroom windows in the appellant's house face the pitch and the proposal will impact the sunroom during the day and night.
- The lighting report is inadequate, using generic modelling.
- Retaining structure along the eastern boundary is only necessary to facilitate the walking track. Planting at this location is inadequate.
- The land property map does not have an overlay.
- Conditions attached by PA are inadequate.
- Proposed development will devalue appellant's property.
- The pedestrian gate provides access to an unauthorised playing pitch on the opposite side of the road.

#### **1.6.4. P.A. Response**

A response was received from the PA stating that;

- the hedgerow along the southern site boundary is substantially intact and will provide a substantial degree of screening;
- the PA is satisfied that appropriate measures have been incorporated to address light spillage;
- planting will soften the eastern boundary of the site;
- no documentation has been submitted to substantiate the appellant's claim regarding ownership, such issues are civil in nature;
- the proposed hours of operation are typical for such facilities;
- the illumination of the walking track is incidental and not the purpose of the application, the track itself is exempted development;
- the proposal is not considered to devalue the appellant's property; and,
- the proposed steps do not result in safety concerns, accessing onto a wide verge.

### **1.6.5. Observations**

None received.

### **1.7 EIA Screening**

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

### **1.8 AA Screening**

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

## **2.0 Assessment**

2.1. Having examined the application details and all other documentation on file, including the appeal, and having inspected the site, and having regard to the relevant policy and guidance, I consider the main issues in relation to this appeal are as follows:

- Scope/Extent of Development
- Impact on Residential Amenity
- Impact on Visual Amenity
- Issues Arising

### **2.2. Scope/Extent of Development**

2.2.1. Following a request for Further Information the extent of the proposed development was amended to include works carried out along the eastern boundary of the site, specifically the provision of a retaining concrete wall (c. 2 metres high) with green paladin fencing mounted atop and a set of concrete steps connecting the side of the

main pitch to the local access road along the east of the site; 2 no. Perspex dugouts along the east of the pitch and an entrance gate and pillars. The changes were readvertised in accordance with Article 35 of the Planning and Development Regulations, 2001, (as amended). I have based my assessment on the development as amended following the request for Further Information.

### 2.3. Impact on Residential Amenity

- 2.3.1. The crux of the appeal is that the proposed floodlights will have a detrimental impact on the amenity of the appellant's residence which is located to the south of the appeal site, specifically in terms of light spill. In addition, the appellant notes that the existing boundary hedge along the southern site boundary does not afford a sufficient degree of screening, and that the lighting study submitted with the planning application, being desk based, is inadequate.
- 2.3.2. The first party states that the light study is based on a software calculation as the lighting has not yet been installed, that the level of light spill from the proposed floodlights will be minimal, having a LUX of less than 1 on the rear elevation of the appellant's dwelling, and as such will not affect the amenity of the property to the south. The first party also notes that the pitch has been served by floodlighting since 1991, with the floodlights only being removed in the interim to allow for redevelopment at the ground.
- 2.3.3. The main method of determining surface luminance on an adjacent property is with reference to LUX. Whilst the lighting report submitted by the applicant is based on software modelling it is site specific and as such I am satisfied that it forms an appropriate base for modelling light spill at the site and in the vicinity. I am not aware of any standard or guidance on this matter in Ireland however I note that the UK guidance by the 'ILP<sup>2</sup> *The Reduction of Obtrusive Light* GN01:21' provides guidelines in relation to light spill, and provides that in rural areas, classed as Environmental Zone E2, luminance on the vertical plane should be a maximum of 5 lux pre-curfew and 1 lux post-curfew (assumed to be between 2100 hours or 23.00hrs, and 0700 hours). From reviewing the technical information submitted, specifically Section 3.4 of the

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<sup>2</sup> Institute of Lighting Professionals

report prepared by Signify (Reference D-460668-Rev 2) submitted to the Planning Authority in response to the request for Further Information, I note that luminance levels are indicated as 0 at the location of the appellant's dwelling. Luminance levels of 6 and 25 are indicated within the appellant's property however these levels are limited to small area in the south-west corner of the appellant's garden and would not in my opinion have a significant negative impact on the appellant's amenity. The closest lighting column will be c. 48 metres from the side wall of the appellant's house, which is situated on an elevated site relative to the pitch. The hedge along the southern boundary of the appeal site, whilst intermittent in places, will provide a degree of screening in my opinion mainly to the garden area, as will the garage structure located in the rear garden of the appellant's property. The proposal indicates additional planting along the southern boundary of the appeal site which will likely further reduce lamination levels reaching this small area of the appellant's garden. Should the Board be minded to grant permission for the proposed development, I recommend that the floodlights are permitted to operate between the hours of 1000 hours and 2130 Monday to Sunday, and that details of the proposed mounting of the luminaries on each of the lighting columns shall be agreed with the Planning Authority prior to the commencement of development. Having regard to the forgoing I am satisfied that the proposed floodlights are acceptable and would not warrant a refusal of permission.

#### **2.4. Impact on Visual Amenity**

- 2.4.1. The appellant contends the proposed retaining structure and fence is visually obtrusive, overbearing and inappropriate at this rural location, that the proposed planting along the eastern boundary of the site is not comparable to the planting which previously existed at this location and that the landscape plan for this location is inadequate. The appellant also raises concerns that the floodlighting would be detrimental to the visual amenities of the area.
- 2.4.2. The appeal site is located within the centre of the village at an existing, established GAA ground. Additionally, I note that floodlights are permitted to operate at the all-weather pitch (see PA. Ref. 04/813). I consider that structures such as ball stop nets, dug outs, and floodlighting are common at such facilities and in this regard I do not consider that the proposal would be incongruous within this context. Whilst I agree

with the appellant that the retaining wall along the eastern boundary of the site is somewhat dominant, and that the removal of hedgerow at this location has altered the character of the area I note that the planting proposed along this boundary will assist in softening the appearance of the boundary wall.

## **2.5. Issues Arising**

### **2.5.1. Encroachment**

The appellant contends that the red line boundary of the site is inaccurate, that it appears to encroach on the appellant's property, and that works and planting appear to be within the appellant's property. The first party has submitted an extract indicating the extent of the folio associated with the appeal site. I note that the extent of the appeal site, as depicted by the red line boundary on the site location map, appears consistent with the folio map. Having considered the issues raised by both parties I note that these issues are civil issues to be resolved between the applicant and appellant having regard to the provisions of Section 34 (13) of the Planning and Development Act, 2000, as amended, and as such are outside the scope of this appeal.

### **2.5.2. Devaluation**

The appellant contends that the proposed development would result in the devaluation of his property. Having regard to the assessment and conclusions set out above, I am satisfied that the proposed development would not seriously injure the amenities of the area to such an extent that would adversely affect the value of property in the vicinity.

### **2.5.3. Other Works**

The appellant refers to other works carried out at the club grounds, including the use of generators and the provision of a walking track. I note that these works do not fall within the planning application/appeal and are therefore outside the scope of this appeal.

#### 2.5.4. Traffic Safety

The proposal includes a gated entrance along the eastern boundary of the site. Based on the information submitted with the application/appeal it appears that this entrance replaces a previous access. I note that it is common for sports grounds to have a secondary access to cater for emergency access. Achievable sightlines of 75 metres are indicated to the north and south from this entrance in accordance with Table 13.13 of the Louth County Development Plan 2021-2027. The appellant also notes that issues of pedestrian safety have not been given adequate consideration in relation to the pedestrian gate. Having visited the appeal site I am satisfied that the pedestrian steps/access would not result in any significant safety issues for pedestrians noting its location and design. In my opinion the steps would allow for visitors to exit via a secondary location, thereby reducing the numbers of pedestrians existing from the main access to the north of the site, which also serves as a vehicular entrance. In my opinion the proposed vehicular and pedestrian accesses along the eastern boundary of the appeal site are acceptable from a traffic/pedestrian safety perspective. Should the Board grant permission/retention for the proposed development I recommend that a condition is attached stipulating that the gated vehicular access is reserved for emergency use only. The appellant also raises concerns regarding the potential impact of the floodlights on road users. I note the luminance levels indicated on the road to the east of the appeal site (see Section 3.4 of the report prepared by Signify, Reference D-460668-Rev 2, submitted to the Planning Authority in response to the request for Further Information) and do not consider that the level of light spill would cause a hazard to road users. Additionally, impacts from glare are typically as a result of the angle of lighting. At 18 metres in height the proposed floodlights will be unlikely to result in significant glare noting their angle relative to the surface of the pitch. Should the Board grant permission for the proposed floodlights I recommend that a condition is attached requiring that the luminaries are mounted so as to minimise the potential of obtrusive light/glare into neighbouring lands, which would include the adjoining road, and that the developer complies with future requirements of the Planning Authority in relation to adjusting the lights should an issue arise once the floodlights are commissioned.

#### 2.5.5. Development Contributions

Section 8 of the adopted Louth County Council Development Contribution Scheme, 2023 sets out the level of development contributions for specific types of development. Under this section Note 6 states that *'all retention permissions will be charged a multiple of 1.5 times the appropriate rates for any development'*. Section 9 of the adopted Louth County Council Development Contribution Scheme however provides an exemption from development contributions for development carried out by a non-profit organisation in respect of recreational use. Notwithstanding that an element of the proposal comprises retention permission, as the applicant is a non-profit voluntary organisation I consider that the proposal would not attract a development contribution, should the Board be minded to grant retention/permission for the proposal.

### 3.0 Recommendation

- 3.1. Having regard to the above it is recommended that retention and permission is granted based on the following reasons and considerations and subject to the attached conditions.

### 4.0 Reasons & Considerations

Having regard to the location of the proposed development on lands already developed and in use for sports purposes, the provisions of the Louth County Development Plan 2021-2027, and to the nature and scale of the proposed development, it is considered that, subject to compliance with the conditions set out below, the development as proposed would not seriously injure the residential or visual amenities of the area or of property in the vicinity, and would not represent a traffic hazard. The development would, therefore, be in accordance with the proper planning and sustainable development of the area.

### 5.0 Conditions

1.	The development shall be retained/carried out and completed in accordance with the plans and particulars lodged with the application, as amended by the plans and particulars submitted to the Planning Authority on the 1 <sup>st</sup> June 2023, except as may otherwise be required in order to comply with the
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	<p>following conditions. Where such conditions require details to be agreed with the Planning Authority, the developer shall agree such details 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><b>Reason:</b> In the interest of clarity.</p>
2.	<p>Within one month of a final grant of permission/retention permission the applicant shall submit a landscape plan the Planning Authority for its written agreement, detailing suitable screen planting along the southern and eastern boundaries of the site at the locations indicated on <i>Drawing StK/22/02/-A</i> received by the Planning Authority on the 1<sup>st</sup> June 2023. All landscaping shall be carried out within the first planting season following a grant of permission/retention permission.</p> <p><b>Reason:</b> In the interests of visual amenity.</p>
3.	<p>The vehicular access on the eastern boundary of the site shall be used for emergency access only.</p> <p><b>Reason:</b> In the interests of traffic safety.</p>
4.	<p>Details of the mounting of the luminaries on each of the lighting columns shall be agreed in writing with the Planning Authority prior to the commencement of development. The luminaries shall be mounted so as to minimise the potential of obtrusive light, glare and light pollution into neighbouring lands. The developer shall comply with all future site lighting requirements of the Planning Authority in relation to adjusting the lights by re-aiming, the addition of louvres, cowls and shields and/dimming.</p> <p><b>Reason:</b> In the interest of residential amenity.</p>
5.	<p>The floodlights hereby permitted shall not operate between the hours of 2130 hours and 1000 hours Monday to Sunday.</p> <p><b>Reason:</b> In the interest of residential amenity.</p>
6.	<p>Notwithstanding the provisions of the Planning and Development Regulations 2001, as amended, the proposed lighting poles shall not be used for the</p>



	<p>erection or placing thereon of any structures other than the luminaries proposed.</p> <p><b>Reason:</b> In order to allow the Planning Authority to assess the implications of the visual amenity of any further structures through the statutory planning processes.</p>
7.	<p>Site development and building works shall be carried out only between the hours of 0800 to 1900 Mondays to Fridays inclusive, between 0800 to 1400 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><b>Reason:</b> In order to safeguard the residential amenities of property in the vicinity.</p>

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.

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Ian Campbell  
 Planning Inspector

24<sup>th</sup> September 2023