



An
Bord
Pleanála

Inspector's Report ABP-318700-23

Nature of Application

Application for consent for compulsory acquisition of a derelict site in accordance with Section 14 of the Derelict Sites Act 1990, as amended

Location

The Royal Bar, and No.'s 12, 13 and 14 Lombard Street, Waterford, Co. Waterford

Local Authority

Waterford City & County Council

Notice Party

Neville Hotels Unlimited Company (c/o Seamus Neville)

Date of Site Inspection

3rd May 2024

Inspector

Ian Campbell

1.0 Introduction

- 1.1. This case relates to a request by Waterford City and County Council (WCCC) for the consent of An Bord Pleanála to the compulsory acquisition of the subject site, The Royal Bar and No.'s 12 – 14 Lombard Street, Waterford, in accordance with the provisions of the Derelict Sites Act, 1990, as amended.

2.0 Site Location and Description

- 2.1. The property which is the subject of this proposed compulsory acquisition (referred to hereafter as the 'subject property') is located on the eastern side of Lombard Street, opposite the junction with Bolton Street, in the centre of Waterford City. John's River bounds the subject property to the south-east.
- 2.2. The subject property comprise a vacant four storey former public house (The Royal Bar), and 3 no. adjoining three storey buildings which also appear to be vacant having previously been in commercial use, i.e. No. 12, 13 and 14 Lombard Street (with no. 12 being the easternmost property).
- 2.3. Adjacent properties in the area appear to be occupied and are in reasonable condition.
- 2.4. On the date of my site inspection the property was secure. The front/street facing facades of the Royal Bar are dirty with extensive areas of plaster flaking/cracked and the entire building is in need of repair/repainting. Vegetation is growing from the façade of the building and there is graffiti on the side and rear facades of The Royal Bar.
- 2.5. The front façades of No. 12 – 14 Lombard Street are similarly in a poor state of repair and are in need of repair/re-painting. The roof of No. 13 and 14 appears to be sagging and some of the roof tiles of No.'s 13 and 14 appear to be damaged. Rain goods serving No.'s 13 and 14 are rusted and dirty. Vegetation is growing from the front façade of No. 13. The front façade of No. 12 is cracked and appears to be structurally compromised. Weeds are evident to the front of No. 12 and there are loose wires hanging from the front façade. The shopfront to No. 12 is dirty and in need of repair/repainting. The side wall of No. 12 is dirty and stained and there is an extensive overgrowth of ivy to the side and rear of No. 12.

3.0 Application for Consent for Acquisition

3.1. Waterford City and County Council (WCCC) has applied to the Board for consent to compulsorily acquire the site under section 14/16 of the Derelict Sites Act, 1990, as amended. I note that this application is subsequent to the serving of notices under Section 11 (i.e. requiring the carrying out of specified measures to prevent land becoming or continuing to be a derelict site) on the 13th of April 2023, Section 8(2), (i.e. advising of the Local Authority's intention to enter the site on the register of derelict sites) on the 14th of April 2023, and under Section 8(7) (i.e. advising of the Local Authority's decision to enter the site on the register of derelict sites) on the 29th of June 2023.

4.0 Application and Objection

4.1. Notice of Intention to Acquire

4.1.1. Notice of WCCC's intention to acquire the site compulsorily was served on the owner of the property on the 16th of October 2023, and was published in the Munster Express newspaper on the 17th of October 2023. The site was described as follows in the notices:

- The Royal Bar, Lombard Street, Waterford, covering an area of 0.0695 acres or thereabouts, in the District Electoral Division of Waterford City East.
- No. 12 Lombard Street, Waterford, covering an area of 0.0231 acres or thereabouts, in the District Electoral Division of Waterford City East.
- No. 13 Lombard Street, Waterford, covering an area of 0.0054 acres or thereabouts, in the District Electoral Division of Waterford City East.
- No. 14 Lombard Street, Waterford, covering an area of 0.0042 acres or thereabouts, in the District Electoral Division of Waterford City East.

The said derelict sites are more particularly shown outlined in red on map bearing reference CPA 2023-13 (Plots 101, 102, 103 and 104) in the Derelict Sites Register established and maintained by Waterford City /and County Council under Section 8 of the Derelict Sites Act 1990.

- 4.1.2. I consider that the notices were in accordance with the requirements of section 15(1)(a) and (b) of the Derelict Sites Act 1990, as amended.

4.2. Objection to Acquisition

- 4.2.1. 1 no. objection from Neville Hotels Unlimited Company, c/o Seamus Neville (dated 24th October 2023 and received by WCCC on the 25th October 2023) was submitted to WCCC in respect of the proposed acquisition of the property. The objection notes that the subject property will be subject to a planning application which will be lodged in the next two/three weeks and that a pre-planning meeting was held (reference to a report is made but no report has been attached).

4.3. Local Authority's Application for Consent

- 4.3.1. The Local Authority requests the consent of the Board to the compulsory acquisition of the derelict site. The application for consent was submitted on 14th of December 2023 and was accompanied by the following:

- Local Authority Compulsory Acquisition Report (including photographs of subject property) which sets out the Local Authority's strategic approach to derelict sites, a description of the site and relevant policy designations affecting the site.
- Copy of Chief Executive's Order.
- Derelict site location map.
- Copy of the notices served on the owner/occupier of the site (dated 16th of October 2023). Proof of postage included in respect of same.
- Copy of the newspaper notice (dated 17th of October 2023).
- Folios relating to subject property (Folio WD37664D and WD43192F).
- Copy of objection made by Neville Hotels Unlimited Company, c/o Seamus Neville (dated 24th October 2023) and submitted to the Local Authority.
- Acknowledgement of objection to Section 15 Notice sent to Neville Hotels Unlimited Company, c/o Seamus Neville.

4.3.2. The **Derelict Site Report** can be summarised as follows:

- On foot of the Urban Regeneration and Development Fund (URDF), which aims to deliver compact and sustainable development, and in line with the identified need to bring existing derelict and long-term vacant properties into use for residential and other purposes, Waterford City and County Council seek to use the Derelict Sites Act (1990) to undertake the compulsory acquisition of The Royal Bar and No.'s 12-14 Lombard Street, Waterford.
- The definition of dereliction as per the Derelict Sites Act (1990) is set out as follows;

“Any land...which detracts, or is likely to detract, to a material degree from the amenity, character or appearance of land in the neighbourhood of the land in question because of—

(a) the existence on the land in question of structures which are in a ruinous, derelict or dangerous condition, or

(b) the neglected, unsightly or objectionable condition of the land or any structures on the land in question, or

(c) the presence, deposit or collection on the land in question of any litter, rubbish, debris or waste, except where the presence, deposit or collection of such litter, rubbish, debris or waste results from the exercise of a right conferred by or under statute or by common law.”

- The site comprises a disused public house and the adjoining commercial building. The Royal Bar has not been operating as a public house for approximately 10 years. The Royal Bar is in a prominent corner plot on Lombard Street and William Street. The building is 4 bays wide on the ground floor and 3 bays wide on the 3 floors above.
- No. 13-14 Lombard Street makes up part of this landholding. No. 12 comprises a vacant and disused building, the ground floor had been used for commercial purposes until 2009/2010. No.13-14 Lombard Street is a three storey, three bay premises that has a traditional style wooden shopfront on the ground floor. No. 12 consists of three storeys in height and two bays in width.

- Overall, the design of both No.13-14 Lombard Street buildings is attractive. The Royal Bar benefits from decorative quoins on the façade as well as decorative features around the windows. It is not clear if the upper floors of these buildings were used for commercial or residential uses however, it is assumed that the upper floors of The Royal Bar are of a use that relates to the use of the site as a public house and that the upper floors of 13-14 are of a commercial use.
- The immediate vicinity of the subject site is mixed use in nature with a various fast-food outlets, cafes, retail premises and residential uses in the vicinity.
- The site is not locally or nationally protected structures but are located within an Architectural Conservation Area and a Zone of Notification.
- Applicable designations in the Waterford City and County Development Plan 2022 – 2028 include;
 - Zone of Notification - Archaeology;
 - Waterford City Settlement Boundary;
 - Town Core Zone;
 - Waterford City - DeCarbonising Zone;
 - Waterford City Architectural Conservation Area.
- Policy Objectives referred to as being relevant include, Objective ECON 4 (City and Town Centre First Approach); Objective ECON 7, which relates to Active Land Management; Objective H06 relating to the use of powers under the Derelict Sites Act 1990 to prevent dereliction; and Objective Place 01 which similarly provides for the use of powers under the Derelict Sites Act 1990 to address vacancy and dereliction; Policy Objective H31 in relation to the refreshment of existing structures; and Built Heritage Policy BH 13 in relation to the redevelopment of structures with Architectural Conservation Areas.
- WCCC attempted to confirm ownership of the property using Land Direct, a Deeds search via Land Direct and also enquires the Planning Department of

WCCC. The owner of the property was identified as Neville Hotels Unlimited Company.

- The timeline for the serving of notices under the Derelict Sites Act, 1990 by WCCC is set out as follows;
 - Section 11 Notice requiring the carrying out of specified measures to prevent land becoming or continuing to be a derelict site: 13th of April 2023.
 - Section 8(2) Notice of intention to enter land in Derelict Sites Register: 14th of April 2023.
 - Section 8(7) Notice of Entry of Land in Derelict Sites Register: 29th of June 2023.
 - Section 15(1)a Notice of Intention to Acquire Derelict Site Compulsorily: 16th of October 2023.
- WCCC contend having regard to the observed condition of the property, in particular its neglected and unsightly state, it is considered that the site materially detracts from the amenity, character and appearance of land in the neighbourhood and is therefore a derelict site within the meaning of Section 3 of the Derelict Sites Act, 1990, as amended, and subsequently, it is considered reasonable that the Local Authority seeks to compulsorily acquire the land, as provided by Section 14 of the Act.

4.4. Objector's Submission

- 4.4.1. No objections were received by the Board.

5.0 Planning History

5.1. Subject Property (relevant/recent)

PA. Ref. 24/60300¹ – Permission sought for demolition of existing 3 storey buildings, no's 12 and 13 Lombard Street and existing 4 storey building at corner of Lombard Street / Rose lane and for the development of a 3 / 4 storey hotel building comprising meeting / function room, reception area, toilets, warming Kitchen, refuse store, 2 no. access stairs and lift, altered carpark layout to accommodate 76 no. cars and 10 no. bicycles all at Ground Floor Level, 46 no. total hotel suites / bedrooms comprising of 3 no. two bedroom hotel suites, 1 no. hotel bedroom and 12 no. one bedroom suites at both first and second floor and 11 no. 1 bedroom suites, 2 no. 2 bedroom suites and 1 no. hotel room at third floor level and all associated site works.

This application was lodged on the 31st May 2024 and a decision is due on the 25th July 2024.

6.0 Policy Context

6.1. Waterford City and County Development Plan 2022-2028

- 6.1.1. The subject property is zoned 'TC' (Town Core)' in the Waterford City and County Development Plan 2022-2028.
- 6.1.2. The subject property is located within the Waterford City Architectural Conservation Area in the Waterford City and County Development Plan 2022-2028.
- 6.1.3. Relevant objectives/policy in the Waterford City and County Development Plan 2022 – 2028 include;
 - Objective Place 01 (Chapter 8 – Placemaking): *'identify obsolete and potential opportunity sites within the City and County and encourage and facilitate the re-use and regeneration of derelict land and buildings in the urban centres; work with landowners and development interests to pursue the potential of suitable, available and viable land and buildings for appropriate development/renewal;*

¹ The site associated with PA. Ref. 24/60300 includes The Royal Bar and No.'s 12 – 14 Lombard Street, that being the entire subject property associated with WCCC's proposed compulsory acquisition.

support active land management; and use compulsory purchase orders and statutory powers under the Derelict Sites Act 1990 and the Urban Regeneration and Housing Act 2015, as amended, to address issues of dereliction, vacancy and underutilisation of lands in settlements across Waterford’.

- Objective H06 (Chapter 7 – Housing and Sustainable Communities): *‘utilise legislative power under the Derelict Sites Act 1990, The Urban Regeneration and Housing Act 2015, as amended and general CPO powers to prevent anti-social behaviour and remove dereliction and vacancy where appropriate.’*
- Objective Econ 07 (Chapter 4 – Economy, Tourism, Education and Retail): *‘...assist in the proactive targeting of underutilised, vacant and derelict lands and buildings, and general building stock,...in order to facilitate an Active Land Management approach to the sustainable growth and development of Waterford City and County....achieved by, measures to support the change of use from vacant commercial units to residential, using the Council’s statutory powers, where appropriate, under the Derelict Sites Act 1990 (as amended) and the Urban Regeneration and Housing Act 2015 (as amended), and.... the acquisition by agreement or compulsory purchase, of vacant, derelict or underutilised sites or buildings, in order to address incidents of urban decay and vacancy, ensure revitalisation and conservation of our built heritage; regeneration of underutilised sites/ buildings, and bring about long-term economic and social/ community development and sustainability.’*
- Objective BH05 (Chapter 11 – Heritage): in summary, seeks to preserve the special character of Architectural Conservation Areas.

6.2. Derelict Sites Act 1990 (as amended)

- 6.2.1. The Derelict Sites Act 1990, as amended, makes provisions to prevent land being or becoming a derelict site. Amongst other things, it enables Local Authorities to require landowners or occupiers to take measures on derelict sites and, in certain circumstances, to acquire derelict sites compulsorily.
- 6.2.2. Section 3 of the Act defines ‘derelict site’ as:

“Any land...which detracts, or is likely to detract, to a material degree from the amenity, character or appearance of land in the neighbourhood of the land in question because of—

(a) the existence on the land in question of structures which are in a ruinous, derelict or dangerous condition, or

(b) the neglected, unsightly or objectionable condition of the land or any structures on the land in question, or

(c) the presence, deposit or collection on the land in question of any litter, rubbish, debris or waste, except where the presence, deposit or collection of such litter, rubbish, debris or waste results from the exercise of a right conferred by or under statute or by common law.”

- 6.2.3. Section 8 of the Act requires Local Authorities to establish a register of derelict sites in their functional area and to serve notices on occupiers/owners of their intention to do so.
- 6.2.4. Section 9 of the Act places a duty on every owner and occupier of land, to take all reasonable steps to ensure that the land does not become or does not continue to be a derelict site.
- 6.2.5. Section 10 of the Act places a similar duty on Local Authorities to take all reasonable steps, including the exercise of any appropriate statutory powers, to ensure that any land in their functional area does not become or continue to be a derelict site.
- 6.2.6. Section 11 of the Act enables Local Authorities to serve a notice on an owner or occupier of land, requiring them to take specified measures to prevent land becoming or continuing to be a derelict site.
- 6.2.7. Section 14 of the Act provides that a Local Authority may acquire by agreement or compulsorily any derelict site situated in their functional area.
- 6.2.8. Section 15 of the Act sets out arrangements for giving notice, if the Local Authority intend to acquire a derelict site compulsorily.
- 6.2.9. Section 16 of the Act sets out arrangements if the owner/occupier wish to object to the acquisition. Specifically, section 16, as amended, provides that where an objection is made, the derelict site shall not be acquired compulsorily by the Local Authority without the consent of the Board.

7.0 Assessment

7.1. Site Inspection

- 7.1.1. Internal access to the property was not possible on the date of my site inspection and I carried out my site inspection from the public road (Lombard Street, Rose Lane and surrounding area). The subject property is located in the centre of Waterford City. Neighbouring properties appear to be well maintained and are in good condition. The area has an attractive appearance.
- 7.1.2. The properties have a neglected, unsightly and objectionable appearance from the public road and surrounding area. The façades of the building are in a poor state of repair with plaster flaking and are in need of repair/repainting. Graffiti is evident on the rear and side facades of The Royal Bar. The shopfront of No. 12 Lombard Street is dirty and in need of repair/repainting. The guttering of the properties requires repair/painting and there is vegetation growing out of the front façade of The Royal Bar and No. 13 Lombard Street. The roof of No.'s 13 and 14 Lombard Street appears to be sagging. The side/gable elevation of No. 12 Lombard Street, which is particularly prominent, is stained and there is extensive ivy growth on this wall. The subject property detracts significantly from the character and appearance of the street.

7.2. Category of Dereliction

- 7.2.1. Based on the condition of the subject property which I observed during my site inspection I do not consider that the site falls within category (a), of Section 3 of the Derelict Sites Act, 1990, which relates to structures which are in a ruinous, derelict or dangerous condition.
- 7.2.2. I consider that the site falls within category (b) of Section 3 of the Derelict Sites Act, 1990, due to the land and structure being in a neglected, unsightly and objectionable condition. I particularly note that the subject property is located at a prominent location in the centre of Waterford City where there is a high footfall, that the property is within an Architectural Conservation Area and is located alongside buildings which are for the most part attractive and well maintained.

7.2.3. I did not observe the presence of litter, debris, rubbish or waste at the subject property and as such I do not consider that the site falls within category (c) of Section 3 of the Act.

7.2.4. In conclusion, I consider that the property demonstrably detracts from the amenity, character and appearance of land in the vicinity of the site, which in my view, renders it derelict under Section 3 of the Act.

7.3. Action of the Local Authority

7.3.1. Dereliction would appear to be an issue at the subject property for some time, and using the dated Streetview function on Google Maps I note that the subject property began to fall into disrepair around 2014 and has continued to deteriorate. Having established the identity of the owner of the property WCCC served a Section 11 Notice on the owner of the property in April 2023 requiring the carrying out of specified measures to prevent land becoming or continuing to be a derelict site. The measures contained in the Section 11 Notice are stated in the Derelict Site report as including, repairing/repainting of the property, in particular shopfronts, guttering, all elevations and associated features, windows, doors, fascia and soffits and chimneys; maintaining the property in a secure condition; and maintaining the site free from litter and debris. The works specified in the Section 11 Notices were not carried out. WCCC also served a Section 8(2) Notice in April 2023. The property was then added to the Derelict Sites Register on the 29th of June 2023 with Section 8(7) Notices served on the owner of the property. Section 15 Notices were subsequently served by WCCC on the 16th of October 2023. WCCC's Derelict Sites report notes that the property owner communicated with WCCC in July 2023 and referred a planning permission however at that time WCCC note that there was no live permission relating to the subject property.

7.3.2. I note that Local Authorities have a duty (under section 10) "to take all reasonable steps (including the exercise of any appropriate statutory powers) to ensure that any such land does not become/continue to be a derelict site." Based on the information on the file I note that WCCC have attempted to have the site rendered non-derelict by establishing the identity of the owner, and then by issuing a Section 11 Notice which comprehensively set out what measures were required to address the condition of the

property. I note that the Section 11 Notice was not complied with. It is clear that WCCC have attempted to address the issue of dereliction at the property with the owner of the property. I note that the objection submitted to WCCC refers to the imminent lodgement of a planning application and that a planning application was lodged in May 2024. Having regard to the forgoing I am satisfied that the Local Authority gave the property owner sufficient time and opportunity to address the dereliction and have explored other means of achieving the aim of rendering the property non-derelict. Therefore, I am satisfied that the efforts of the Local Authority have been fair and reasonable.

7.4. Compliance with Development Plan

- 7.4.1. I note that the Waterford City and County Development Plan 2022-2028, and specifically Objective Place 01 which seeks to facilitate the re-use and regeneration of derelict land and buildings and, use statutory powers under the Derelict Sites Act 1990 to address issues of dereliction. I also note that the property is within an Architectural Conservation Area, and that Objective BH05 seeks to preserve the special character of Architectural Conservation Areas. The property would appear to be in a derelict state for approximately 10 years. Therefore, I consider that the proposed compulsory acquisition of the property would be consistent with the policies and objectives of the Development Plan and will ensure that the lands do not continue to be in a derelict condition.

7.5. Action of the Owner to Address Dereliction

- 7.5.1. As addressed above, WCCC issued a Section 11 Notice on the owner of property setting out the measures required to address the derelict condition of the property. The specified measures were not complied. WCCC's Derelict Sites report note that the property owner communicated with WCCC in July 2023 and referred a planning permission however at that time WCCC note that there was no live permission relating to the subject property. An objection to WCCC was subsequently made by the property owner in respect of the Section 15 Notice. I note that the objection submitted to WCCC from the property owner refers to intention to make a planning application for the redevelopment of the property and that a planning application was lodged in May 2024. At the time of this report there is no decision in relation to this planning

application. Whilst this indicates the property owner's intention to redevelop the site, I note that any grant of permission would not in itself guarantee that the site will be redeveloped as the permission may not be implemented, or implemented in a timely fashion.

7.5.2. Based on my observations of the property no substantive works have taken place to the subject property to render it non-derelict and it remains that the continuing dereliction of the property is having a significant adverse effect on the amenities and appearance of the area. The property is also located within an Architectural Conservation Area and I also note the location of the subject property in a busy and heavily trafficked part of the city. I note that owner/occupiers have obligations (under section 9 of the Act) to "take all reasonable steps to ensure that the land does not become or does not continue to be a derelict site". It is now approximately 14 months since Section 11 Notice was served, approximately 12 months since the Section 8 Notices were served. It has also been 8 months since the Local Authority served the Section 15 notice of intention to acquire the site compulsorily. Having inspected the site, there is no evidence of any further attempt to render the site non-derelict and the property remains in a neglected and unsightly condition. I therefore consider that the site remains in a derelict condition.

7.5.3. Having regard, therefore, to all of the information available on the file and the continued appearance and condition of the property, which as stated constitutes a derelict site, I consider that it is appropriate that the Local Authority's application for consent to compulsorily acquire the site at The Royal Bar and No.'s 12-14 Lombard Street, Waterford is granted.

8.0 Conclusion

8.1. I am satisfied that the process and procedures undertaken by Waterford City and County Council have been fair and reasonable, that the Local Authority has demonstrated the need for the lands and that all the lands being acquired are both necessary and suitable to ensure that the lands do not continue to be a derelict site.

8.2. Having regard to the Constitutional and Convention protection afforded to property rights, I consider that the acquisition of the Derelict Site, The Royal Bar and No.'s 12-

14 Lombard Street, Waterford as set out in the Derelict Site Notice issued under Section 15(1)(b) of the Derelict sites Act 1990, (as amended) and dated 16th of October 2023 and on the deposit map (Ref. CPA 2023 – 13 – Plots 101 – 104 inc.), pursues, and is rationally connected to, a legitimate objective in the public interest, namely, to ensure that the lands do not continue to be in a derelict condition.

- 8.3. I am also satisfied that the acquiring authority has demonstrated that the means chosen to achieve that objective impair the property rights of affected landowners as little as possible. In this respect, I have considered alternative means of achieving the objective referred to in submissions to the Board, and am satisfied that the acquiring authority has established that none of the alternatives are such as to render the means chosen and the proposed compulsory acquisition of the property made by the acquiring authority unreasonable or disproportionate.
- 8.4. The effects of the proposed compulsory acquisition on the rights of the affected landowner is proportionate to the objective being pursued. I am further satisfied that the proposed acquisition of these lands would be consistent with the policies and objectives of the Waterford City and County Development Plan 2022-2028, and specifically Objective Place 01 which seeks to facilitate the re-use and regeneration of derelict land and buildings and, use statutory powers under the Derelict Sites Act 1990 to address issues of dereliction, and Objective BH05 which seeks to preserve the special character of Architectural Conservation Areas. Accordingly, I am satisfied that that the confirmation of the proposed compulsory acquisition is clearly justified by the exigencies of the common good.

9.0 Recommendation

- 9.1. Having regard to the observed condition of the application site, in particular the neglected, unsightly and objectionable state of the land and the structure thereon, I consider that the site materially detracts from the amenity, character and appearance of land in the neighbourhood and is therefore a derelict site within the meaning of Section 3 of the Derelict Sites Act, 1990, as amended.
- 9.2. I consider that it is reasonable that the Local Authority seeks to compulsorily acquire the land, as provided by Section 14 of the Act. I recommend that the Board grant consent to Waterford City and County Council to compulsorily acquire the site.

10.0 Reasons and Considerations

10.1. Having regard to the neglected, unsightly and objectionable state of the land and structure thereon, evidenced by the condition of the street facing façades of the property, the condition of the windows and guttering, and the presence of weeds and overgrowth on the façades of the subject property and having considered the objection made to the compulsory acquisition, and also:

- (a) the Constitutional and Convention protection afforded to property rights,
- (b) the public interest, and,
- (c) the provisions of the Waterford City and County Development Plan 2022 – 2028,

it is considered that the site detracts to a material degree from the amenity, character and appearance of land in the neighbourhood and, therefore, comes within the definition of a derelict site as defined in Section 3 (b) of the Derelict Sites Act, 1990, as amended, and that the acquisition of the site by the Local Authority is necessary in order to render the site non-derelict and to prevent it continuing to be a derelict site. It is also considered that the objections made cannot be sustained having regard to that said necessity and that the compulsory acquisition and its effects on the property rights of affected landowners are proportionate to that objective and justified by the exigencies of the common good.

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.

Ian Campbell
Planning Inspector

20th June 2024