



An
Bord
Pleanála

Inspector's Report PL29N.YM0004

Development

Approval sought to alter the terms of Application previously approved under Reg. Ref. 29N.YA0010 pursuant to Section 146B of the Planning and Development Act, 2000. The proposed alterations sought involve the omission of 3 construction site compounds previously approved under 29NJ.YA0010 and the provision of 3 new temporary construction site compounds at alternative locations as replacement facilities.

Planning Authority

Dublin City Council.

Type of Application

Request to amend the terms of an approved development under S.146B(1) of the Planning and Development Act, 2000 (as amended).

Applicant

Irish Water.

Date of Site Inspection

9th August 2017

Inspector

Paul Caprani.

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1.0 Introduction

An application has been lodged by Irish Water seeking that the Board exercise its powers under the provisions of Section 146B of the Planning and Development Act to alter the terms of approval for the development of the Ringsend Wastewater Treatment Plant Extension granted by An Bord Pleanála under Reg. Ref. 29N.YA0010. The alterations specifically relate to the relocation of the construction compound to facilitate the carrying out of the major works proposed within the Ringsend Wastewater Treatment Plan under the extant approval.

2.0 Legislative Provisions

Section 146B(1) of the Planning and Development Act 2000, as amended, provides that a person who is intending to carry out a strategic infrastructure development may request the Board to alter the terms of the subject approved development.

Section 146B(2) requires the Board to decide (under 146B(3)) whether or not the making of the said proposed alteration would constitute the making of a material alteration of the terms of the development concerned. The Board may invite submissions prior to making this decision (146B(2)(b)). If it decides under 146B(3)(a) that it would not be a material alteration, then it must alter the approval accordingly. If it determines under 146B(3)(b) that it would constitute a material alteration of the terms of the development, before making that determination the Board must first determine, under 146B(4) whether the requested alteration, or any alteration the Board may be considering under 3(b)(ii), would be likely to have significant effects on the environment. Under 143B(3)(b) the Board shall determine whether to (i) make the alteration, (ii) make a different alteration (not being one that would represent a more significant change to the terms of the development) or (iii) refuse to make the alteration. Public consultation procedures under 146B(8) apply in the case of 146B(3)(b) and 146B(4).

Where it is determined under 146B(4)(i) or (ii) that significant effects on the environment *are not likely*, the Board shall alter the approval accordingly. Where it is determined under 146B(4)(i) or (ii) that significant effects on the environment *are*

likely the provisions of 146C apply and the Board shall require the requester to prepare an EIS and to publish notices regarding statutory public consultation, after which period that Board may determine the matter under section 146B(3)(b) having regard to various matters set out in section 146C(6).

3.0 Planning History

3.1. Planning approval was granted by the Board on 5th November, 2012 for the following:

- Expansion of the firm capacity of the wastewater treatment plant at Ringsend from 1.69 million PE to 2.1 million PE with an overall installed capacity of 2.4 million PE.
- The relocation of the existing outfall serving the WWTP to a point 9 kilometres into the Irish Sea. The outfall currently discharges into the River Liffey adjacent to the ESB station at Poolbeg.
- The development of a green area within the wastewater treatment plant comprising of 0.8 hectares of land for the development of additional secondary treatment to cater for an additional 400,000 PE.
- Various ancillary and sundry works associated with the upgrading including the provision of 6 temporary construction compounds to be used for the storage of construction plant, parking and facilitate the general delivery of the upgrading works. The location of the original compound area is granted are indicated in Figure 3.4 of the Project Report submitted with the current Section 146B application.

The conditions attached to the original grant of planning permission and approval which are pertinent to the current Section 146B application are Condition No. 5 and Condition No. 13 and these are set out in full below.

Condition no.5 – *A construction stage environmental management plan (CSEMP), including all construction method statements, shall be prepared by the developer and implemented by the contractor. The developer shall retain responsibility for overseeing, updating and enforcing the construction environmental management*

plan. The construction environmental management plan shall adhere to the following requirements:

- (a) All preventative and management measures to be applied throughout the construction phase shall be set out so that all potential impacts are minimised, mitigated, or avoided.*
- (b) All measures to be employed in relation to spill contingencies, spoil disposal, management of contaminated soil, the selection of slurry additives and drilling fluids.*
- (c) Measures set out in the Construction Industry Research and Information Association (CIRIA) on the control and management of water pollution from construction sites shall be adhered to.*
- (d) All fuels or chemicals kept on the construction site shall be stored in bunded containers. All refuelling and maintenance of vehicles and equipment shall be carried out in designated containment areas away from sensitive environments.*
- (e) Any waste or hazardous waste residuals or potentially contaminated sludge from spill clean-up shall be stored in appropriate receptacles or containers, or in bunded storage areas prior to their removal by the developer or EPA licenced contractor.*
- (f) Any discharges arising from the construction phase shall incorporate silt removal and hydrocarbon removal using a hydrocarbon interceptor.*
- (g) Weekly monitoring of the water quality being discharged off the site shall take place during the construction phase.*
- (h) Foul sewage shall be transported off site and disposed of by discharging to a licenced sewer network.*
- (i) All marine vessel waste generated during the pipeline survey, and any maintenance vessels including marine rigs, shall accord with relevant guidelines including those guidelines from Annex V of the International Convention for the Prevention of Pollution from Ships, as amended. All hazardous waste stored on ships shall be contained in sealed labelled containers and stored in lockable container cabinets. A record of all types and quantities of waste arising on each vessel shall be kept.*

- (j) The Guidelines entitled 'Requirements for the Protection of Fisheries Habitats during Construction and Development Works at River Sites' prepared by the Eastern Regional Fisheries Board shall be adhered to in full.*
- (k) Management proposals and monitoring protocols for areas of ecology, archaeology, water quality management (both ground and surface), dust management, noise management, traffic management, sediment control, spoil disposal, general pollution control, community liaison, hazardous substance management, environmental training and supervision for personnel.*
- (l) Details of the management of all landscaping within the sites and, where appropriate, in the vicinity of the site.*
- (m) Details of site managers, contact numbers (including out of hours) and public information signs (including warning signs) at the entrance and, where appropriate, at the boundaries of the site.*
- (n) Details of a pest control plan;*
- (o) Staff parking shall not be permitted in the public car park in the vicinity of the site and suitable car parking places shall be provided elsewhere.*

Upon the commencement of construction, the CSEMP will be reviewed according to a regular timeframe and will be updated if necessary. Environmental auditing will be undertaken to ensure compliance with the CSEMP.

Condition no.13 – *A clearly demarcated pedestrian crossing on Pigeon House Road to the east of the wastewater treatment plant, together with the construction of a railing along the footpath on the northern side of the Pigeon House Road and a slip form kerb barrier, shall be provided along the southern side of Pigeon House Road and shall be constructed prior to the commencement of development. Access arrangements for pedestrians shall be monitored on a weekly basis throughout the construction period. Where it is decided that pedestrian access arrangements to South Bull Wall and surrounding amenity area are adversely affected during the construction period, appropriate measures shall be incorporated to minimize any impact on pedestrian access arrangements.*

4.0 Other Relevant Planning Cases

4.1. PL29N.YM0002

Alterations and amendments to the permitted Ringsend Wastewater Treatment Plant were altered by the Board under Reg. Ref. PL29N.YM0002 under the provisions of Section 146B(1) in June, 2016. The alterations consisted of the following:

- Provision of a temporary construction access onto the Pigeon Road c.100 metres west of the main entrance to the Poolbeg Power Station.
- Temporary removal of two small areas of landscaping bunds located within the wastewater treatment plant along its eastern boundary.
- Construction of a temporary haul road c.80 metres long connecting the existing internal wastewater treatment plant roads along the southern and eastern boundaries of the site.

The Board determined that the requested alterations would be of a minor nature and would not be material in terms of the proper planning and sustainable development of the area. The decision was dated 24th day of June, 2016.

4.2. Current Relevant Planning Cases – PC0203

Pre-application consultations are currently on-going with Irish Water regarding a new application under the provisions of Section 37E to alter the parent permission granted under Reg. Ref. 29N.YA0010.

5.0 Request for Alteration under the Current Application (Reg. Ref. YM0004)

5.1. The alterations proposed under the current application relate to providing new compound areas for construction works associated with the wastewater treatment plant upgrade. The Project Report submitted with the application indicates that the current application arises from changes in circumstances resulting in the lack of availability of three of the construction and storage compounds granted under the parent permission in 2012.

5.2. The compounds which are no longer available to use are all located to the west of the Ringsend facility on the northern side of the Southbank Road. They comprise of

three separate land parcels along a 300m stretch on the northern side of the Southbank Road. They are currently undeveloped and comprise of land parcels of approximately 0.47 hectares, 0.106 hectares and 0.68 hectares in size.

- 5.3. It is also proposed to retain three of the compounds granted under the parent permission. These comprise of a site on the southern side of the Southbank Road adjacent to the Covanta Waste to Energy Facility (indicated on the drawings as Site H), a site on the western side of the Shellybanks Road (indicated on the drawings as Site G) and a site at the end of the Poolbeg Peninsula which was originally to accommodate the launch area for the 9 kilometre tunnel.
- 5.4. The alterations and amendments sought under the current application relate to three new sites which are briefly described below.

Site C1

Site C1 is the largest of the proposed new compounds and is located directly to the south of the Covanta Waste to Energy Plant. The site is 3.01 hectares in size and is currently used as a construction compound for the Covanta facility. It accommodates a car park, storage area, temporary site offices in the form of portacabins. Access from the compound to the wastewater treatment plant will be from the Southbank Road and the Shellybanks Road.

Site C2

Site C2 is located on lands to the immediate north of the wastewater treatment plant and comprises of a 0.75-hectare site, 0.64 hectares of which is in the ownership of the applicant. The site is currently unused and is bounded to the north by the storm overflow tanks for the Ringsend Wastewater Treatment System and to the south by the north wall of the Pigeon House Fort. It is accessed from the Pigeon House Road. A new temporary access to the site will be created for HGV movements as the existing access forms part of the Pigeon House Fort wall which is a protected structure. This compound will be used for the storage of material and plant throughout the construction period. A palisade fence will be installed along the northern boundary of the site so as to fence the site off from the adjacent storm overflow tanks.

Site C3

Site C3 is the smallest of the three sites proposed at 0.73 hectares and is located to the north-east of the subject site adjacent to the north-west boundary of the ESB Poolbeg Power Station. This land is under the ownership of Dublin City Council. It is bounded by the power station to the west and the ESB facility to the east. Concrete traffic barriers will be utilised on the western boundary for the protection of the Pigeon House Power Plant.

6.0 Application Submitted to the Board

Irish Water submitted a request for alterations under the provisions of S146B(1) on 21st July, 2017. The application was accompanied by a covering letter, a Project Report and associated drawings. Both the covering letter and the project report set out the background to the alterations sought. The project report also sets out:

- The project background,
- The alterations requested under the current application,
- The policy planning framework with specific reference to the policies contained in the Dublin City Development Plan and the local Framework Plan including the draft Poolbeg West SDZ.
- An AA screening exercise was also submitted with the planning report. It concludes that the alterations sought under the current application will not have a significant impact on any designated European sites in the vicinity.
- The project report goes on to assess the alterations sought in the context as to whether or not they constitute material changes to the parent scheme. It includes the following:
 - The changes are consistent with planning policy in terms of the objectives set out in the Development Plan and the Poolbeg West SDZ Planning Scheme.
 - The proposal will not have any direct impact on traffic volumes and will have a negligible impact on trip distribution and trip assignment in the general area.

- The alterations sought will not have any significant effects on the environment or Natura 2000 sites in the vicinity.
- Mitigation measures will be put in place to ensure that there is no impact on protected structures in the vicinity.
- The alterations will be exclusively for temporary works during the construction period and the works are located exclusively within the lands over which landowner consent has been granted.

Based on the above, the applicant concludes that the proposed alterations

- Are not material.
- Are not likely to have a significant effect on the environment.
- Are not likely to have a significant effect on any designated European site either alone or in combination with other projects in the vicinity.

7.0 Assessment

7.1. The Materiality of the Requested Alterations

The main considerations as to whether the requested alterations can be considered material or not are as follows:

- The extent of which the nature and extent of the amendments proposed could or would alter the overall nature and extent of the parent permission under 29N.YA0010.
- The extent to which the amendments proposed under this application were significant issues in the assessment of the parent development granted by the Board.
- The principle impact arising from the amendments proposed and whether or not such impacts could be deemed to be material in nature.

In relation to the first question, I do not consider that the altering of the development to incorporate additional construction compounds will in any way impact to a material extent on the overall nature and extent of the proposed development. The parent permission comprises of a major industrial/infrastructural development involving the

largescale expansion of the capacity of the largest wastewater treatment plant in the country. Altering the location of the construction compounds, all of which are located outside the confines of the main site, do not result in any alteration in the scheme's ability to treat and dispose of wastewater. The construction compounds do not represent a kernel element of the works to be undertaken on site. The compounds in this instance merely provide ancillary and support space for the parking and storage of plant and equipment and for possible ancillary office/canteen accommodation etc. The compounds will only operate for a temporary period and will cease to operate when works are completed. The relocation of the construction compounds will not in any way result in the alteration of the proposed works to upgrade the wastewater treatment plant. For the above reasons it can be reasonably argued that the amendments would not alter the nature and extent of the development granted approval under the parent permission 29N.YA0010.

In relation to the second issue, I have inspected the parent file and in particular the submissions and the report of the reporting inspector in relation to the application. I am satisfied that, having read the submissions on file and the assessment contained in the planning inspector's report, that issues relating to the location of the construction compounds did not feature at all as contentious or controversial issues during the course of deliberating on the application. This implies that the issue of the location or operation of the construction compounds were not a material issue or a material consideration in determining the original application.

Furthermore, it is apparent from the conditions attached to the permission (specifically Condition No. 5 and Condition No. 13), that approving the alterations sought will not in any way contravene or contradict the requirements of the conditions attached to the parent permission. Therefore, under this particular criteria, I can likewise conclude that the alterations sought cannot be considered material.

With regard to the final question posed in this assessment, whether potential planning impacts which could arise as a result of the alterations sought, these potential impacts are discussed in more detail below.

In terms of contravening the development plan, it is clear from numerous policy statements contained in the development plan that the upgrading of the Ringsend Wastewater Treatment Plant contributes to many of the goals set out in the Plan

which seek to improve water and wastewater services delivery in the city. Allowing alterations and amendments which would support the upgrading and extension to the Ringsend Wastewater Treatment system would in my view be fully in accordance with such policy statements.

The location of the three new compounds are covered by three separation zoning objectives namely:

- Z7 – to provide for the protection and creation of industrial uses and to facilitate opportunities for employment creation.
- Z14 – to seek the social, economic and physical development and rejuvenation of an area with mixed use of which residential and Zone 6 would be the predominant uses.
- Z9 – to preserve, provide and improve recreational amenity and open space and green networks.

Under Zoning Objective Z7, I note that ‘public service installation’, ‘storage depot’ and ‘support office ancillary to primary use’ are all permissible uses under this zoning objective.

I note that under Zoning Objective Z9, the ‘public service installation which would not be detrimental to the amenity of Z9 zoned lands’ would also be deemed to be a permissible use. I consider in this instance that the public service installation which would be of a temporary nature would therefore be acceptable. It should be noted that only a small part of compound C1 is governed by the Z9 zoning designation. The photographs attached also indicate that the lands that form part of the C1 compound which are governed by the Z9 zoning do not currently form part of the grassland area associated with the Irishtown Nature Reserve.

The remainder of C1 is designated as Zone Z14 which relates to strategic development in regeneration areas. Again ‘public service installations’ are a permissible use under this zoning objective.

In conclusion therefore I consider the proposed uses are in accordance with the zoning provisions contained in the development plan. While two of the compounds Compound C1 and Compound C2 incorporate areas of lands which are governed by the Zoning Objective Z9, to preserve, provide and improve recreational amenity and

open space, I note that public service installations are permitted where they are not deemed to be detrimental to the amenity of the Z9 zoned lands. The temporary nature of the compounds in this instance would in my view not result in a land use which would be detrimental to the amenity of the lands in the longer term and therefore can be deemed a permissible use in my opinion.

Part of the proposed compound C1 is also located within the draft Poolbeg West SDZ. This SDZ is at a draft stage currently. Part of proposed compound C1 is located in an area predominantly designated as mixed use (B2). I would agree with the applicant's conclusion that the proposed temporary use of these lands as a construction compound would not conflict with the longer term provisions of the planning scheme when it is finally adopted.

It is noted that there are a large number of SEVESO sites both upper tier and lower tier in the Dublin Port area. As part of the consultations undertaken in relation to the parent permission, the HSA were notified of the planning application and a copy of the EIS was sent to the authority for comment. The HSA did not make any submission to the Board in respect of the application under YA0010. It can only be concluded therefore that the HSA had no concerns in respect of the parent application from a health and safety perspective in the context of SEVESO sites in the vicinity. If works to be undertaken as part of the parent permission did not raise any concerns from the HSA in terms of potential impacts on SEVESO sites, it is extremely unlikely that the alterations proposed under the current 146B application would give rise to any concerns whatsoever from a health and safety perspective having regard to the minor nature of the amendments sought.

Traffic is perhaps the most probable impact which could be of a material nature resulting from the alterations of the location of the compounds. It is clear however from the information submitted that the alterations sought will not result in any change to the overall traffic volumes associated with construction traffic. In terms of access arrangements, it is proposed to utilise existing entrances to access compounds C1 and C3 both of which are located in close proximity to the wastewater treatment plant and therefore will not give rise to any excessive trip generation along the roads in the vicinity. It is further noted from my site inspection that the roads in question are relatively wide and capable of accommodating

increased volumes of traffic having regard to the modest levels of existing traffic volumes on the road network in the Poolbeg Peninsula.

With regard to the proposed new entrance to Compound 2 this entrance is proposed so as to ensure that the integrity of the protected structure at Pigeon House Fort is protected and maintained. The principle of DMURS has been included in the design of the new junction at Compound 2. The design provides for forward visibility of 49 metres which is in accordance with Table 4.2 of DMURS.

Finally, I consider that the alterations proposed may have the potential to impact on the architectural heritage of the area and in particular the two designated protected structures in the vicinity of Compound 2 namely Pigeon House Fort (RPS 6794) and Pigeon House Power Station (RPS 6796). The north wall of Pigeon House Fort lies adjacent to the southern boundary for Compound 2. It is proposed that a contractor will implement mitigation measures (set out in Appendix 4 of the project report) to protect the remnants of the north wall and power plant from vehicles and machinery using Compound C2. These measures will include utilising concrete traffic barriers during construction to prevent any impacts on the protected structure from internal movements within the compound.

Similarly, in the case of Compound 3 which is located in a paved area immediately east of the old Pigeon House Power Station which is also a protected structure, concrete traffic barriers will be placed during construction in order to prevent any impacts.

Arising from my assessment above I consider that there will be no impacts of a material nature arising from the proposed amendments and therefore having regard to:

- The nature and extent of the development approved under application 29N.YA0010.
- The extent and character of the alterations requested which is a temporary duration for the purposes of the construction of the approved development.
- The absence of any material planning impacts specifically in relation to traffic and road safety and impact on architectural heritage, it is considered that the alterations requested would not constitute the making of a material alteration in

terms of the development concerned within the meaning of Section 146B(2)(a) of the Planning and Development Act, 2000, as amended. The Board should therefore make its decision in accordance with Sections 146B(3)(a) that there be no requirement for the Board to consider the significance of environmental effects.

8.0 **Appropriate Assessment**

- 8.1. In making the current application seeking amendments and alterations to the Board the applicant has included an appropriate assessment screening report (see Appendix 3 of project report).
- 8.2. The Stage 1 AA Screening Report considered 19 European sites within a 15 kilometre radius of the subject site. Having regard to the qualifying interest of the European sites, the Stage 1 Screening Assessment concluded that without any scientific doubt, the proposed works would not have a significant negative effect (direct or indirect) on their own or taken in combination with other plans and projects on the Natura 2000 network in the vicinity. The screening assessment is set out in Table 3 of the screening report. It is concluded therefore on the basis of the findings of the screening for appropriate assessment a Stage 2 Appropriate Assessment is not required.
- 8.3. In carrying out my own Appropriate Assessment Screening, I would agree that due to the minor nature of the amendments proposed and the minor nature of the works to be undertaken as part of these alterations, it is reasonable to screen out the vast majority of the Natura 2000 sites within a 15 kilometre radius. There are however two sites which are of close proximity whereby the works to be undertaken as part of the alterations proposed could potentially have a significant effect on a European site. These sites are the South Dublin Bay SAC (Site Code: 000210). The single qualifying habitats are mudflats and sandflats not covered by sea water at low tide.
- 8.4. The other Natura 2000 site is the South Dublin Bay and River Tolka Estuary SPA (Site Code: 004024). There are 14 species of special interest including the Light Bellied Brent Goose, the Oyster Catcher, the Ringed Plover, the Grey Plover, the Knot, the Sanderling, the Dunlin, the Bar Tailed Godwit, the Redshank, the Black

Headed Gull, the Roseate Tern, the Common Tern, the Artic Tern and wetland species.

- 8.5. The conservation objectives in relation to both European sites are to maintain the favourable conservation status of the habitats and species referred to above.
- 8.6. It is considered that the alterations sought under the current application is likely to have no significant direct effect on the conservation objectives of either aforementioned European site having regard to the nature of the activities to be undertaken which is essentially the use of the sites for the temporary storage and parking of plant and equipment. It is not proposed to carry out any construction activity and the sites in question are for the most part brownfield sites on manmade ground with artificial surfaces which in the case of Compounds C1 and C3 are currently used for storage and parking.
- 8.7. The proposal involves a continuation of the use of lands for storage in the case of Compound C1 and the change of use of vacant or derelict lands to use as a temporary storage compound in the case of Compounds C2 and C3. It is therefore reasonable to conclude that any impact on European sites in the vicinity would be negligible. It is therefore not anticipated that the requested alterations would have a significant effect on Natura 2000 sites in the vicinity.
- 8.8. It is therefore reasonable to conclude on the basis of the information contained on file, which I consider adequate in order to issue a screening determination, that the proposed development, individually or in combination with other plans or projects would not be likely to have a significant effect on European Site No. 00210 (South Dublin Bay SAC) or would be likely to have a significant effect on European Site Nos. 004024 (South Dublin Bay and River Tolka Estuary SPA) or any other European Site in view of the site's conservation objectives and therefore a Stage 2 Appropriate Assessment (and submission of an NIS) is not therefore required.

9.0 Conclusions and Recommendation

Arising from my assessment above, I recommend that the Board make a determination in respect of the alterations sought under Section 146B(3)(a) of the Planning and Development Act, 2000, as amended that the making of the alterations

to which this request relates would not constitute a material alteration to the terms of the development concerned on the basis of the draft order set out below.

WHEREAS the Board issued a decision to approve subject to conditions the development under Reg. Ref. 29N.YA0010 by order dated 5th day of November, 2012.

AND WHEREAS the Board has received a request to alter the terms of the development the subject of the approval.

AND WHEREAS having regard to the nature of the issues involved, the Board decided in accordance with Section 146B(2)(b) of the Planning and Development Act, 2000, as amended, not to invite submissions or observations in relation to the matter from persons who had made submissions and observations in relation to the application the subject of this alteration.

AND WHEREAS the Board decided in accordance with Section 146B(2)(a) of the Planning and Development Act, 2000, as amended, that the proposed alterations would not result in any material alteration to the terms of the development, the subject of permission.

AND WHEREAS having considered all documents on file and the Inspector's Report, the Board considered that the making of the proposed alterations would not be likely to have significant effects on the environment or in any European site.

NOW THEREFORE in accordance with Section 146B(3)(b) of the Planning and Development Act, 2000, as amended, the Board hereby alters the above mentioned decision so that the approved development shall be carried out in accordance with the plans and particulars lodged with An Bord Pleanála on the 21st day of July, 2017.

10.0 Matters Considered

In making its decision the Board has regard to those matters to which by virtue of the Planning and Development Acts and Regulations made thereunder, it was required to have regard. Such matters included any submissions or observations received by it in accordance with statutory provisions.

11.0 Reasons and Considerations

Having regard to the nature, scale and location of the proposed development, the documentation submitted with the request and the report of the Inspector, the Board considered that the requested alterations would be of a minor nature, by reason of the nature, extent and temporary duration in the context of the development as a whole being a major industrial development. The proposed alterations would therefore not be material in terms of the proper planning and sustainable development of the area.

Paul Caprani,
Senior Planning Inspector.

9th August, 2017.