<u>Comhairle Contae Átha Cliath Theas</u> <u>South Dublin County Council</u>



MEETING OF CLONDALKIN AREA COMMITTEE

WEDNESDAY 21st NOVEMBER 2012

HEADED ITEM NO. 8

PART 8 REPORT ON LOCAL GOVERNMENT (PLANNING AND DEVELOPMENT) REGULATIONS 2001 – 2012

> ADAMSTOWN ROAD (R120) IMPROVEMENT SCHEME

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1.0 Introduction

Part 8 of the Planning and Development Regulations 2001 – 2012 (S.I. No. 600 of 2001) prescribes the requirements in respect of Local Authority Development for the purposes of Section 179 of the Planning and Development Act, 2000, as amended. The Regulations apply to the proposed works involved in the Adamstown Road (R120) Improvement Scheme.

The proposed works as displayed consist of the following: -

- 1. The on-line improvement of approximately 1.2km of existing road.
- 2. Construction of 1.2km of new footpaths and cycle tracks in both directions.
- 3. Construction of pedestrian crossings.
- 4. Provision of traffic signage, road markings and public lighting.
- 5. Widening of the 12th Lock Bridge to the east.
- 7. Construction of accesses, boundary treatments and appropriate landscaping works.
- 8. Provision of drainage and ancillary service works.

The road will have a 50 kph speed limit

2.0 Consultation Process

The proposal was advertised in accordance with Part 8 of the Planning and Development Regulations 2001 - 2012 and was on public display from Thursday 16th August 2012 to Friday 28th September 2012. Any person wishing to make a submission or observation with respect to the proposed works was invited to do so in writing. The latest date for receipt of submissions regarding the proposed works was Friday 12th October 2012.

3.0 Submissions Received

Twelve submissions were received from the following: -

- 1. Waterways Ireland. Mr. Mervyn Hamilton (Senior Engineer, Operations, Dublin Metropolitan Area), Waterways Ireland, Eastern Regional Office, Floor 2, Block C, Ashtown Gate, Navan Road, Dublin 15.
- 2. Health & Safety Authority (HSA). Ms. Alice Doherty, Inspector, Health & Safety Authority, HSA Head Office, Metropolitan Building, James Joyce Street, Dublin 1.

- **3.** National Roads Authority (NRA). Ms. Olivia Morgan, Programme & Regulatory Unit, National Roads Authority, St. Martin's House, Waterloo Road, Dublin 4.
- **4.** Irish Aviation Authority (IAA). Ms. Deirdre Forrest, Corporate Affairs, Irish Aviation Authority, The Times Building, 11-12 D'Olier Street, Dublin 2.
- 5. Mr. Brian Keeley, Consultant Ecologist.
- 6. South Dublin Conservation Society. Mr. Pádraig MacOitir, South Dublin Conservation Society, PO Box 10998, Tallaght, Dublin 24.
- 7. National Transport Authority (NTA). Mr. David Clements, Land Use and Transport Planner, National Transport Authority, Dún Scéine, Harcourt Lane, Dublin 2.
- **8.** Inland Fisheries Ireland. Ms. Gretta Hannigan, Senior Fisheries Environmental Officer, Inland Fisheries Ireland, 15a Main Street, Blackrock, County Dublin.
- 9. Mr and Mrs Power, Lock Cottage, The Grange, Lucan, County Dublin.
- 10. Mr. Thomas Halpin, 12th Lock, Newcastle Road, Lucan, Co. Dublin.
- **11. Department of Arts, Heritage and the Gaeltacht.** Mr. Michael Murphy, Development Applications Unit, Department of Arts, Heritage and the Gaeltacht, Newtown Road, Wexford.
- **12. Sanline Systems Ltd.** Ms. Colette McLoughlin, Sanline Systems Ltd, 12th Lock, Newcastle Road, Lucan, Co. Dublin.

A file containing the submissions is available at the meeting.

4.0 Submissions and Observations – Details and Responses.

Issues raised in the Submissions and Observations received, and Responses to each issue are as follows:

Issue 1 Further Consultation.

Submission by: Waterways Ireland

Comment:

"Waterways Ireland has met with the Council and its designers as part of the initial design process for the upgraded bridge and will require further consultation as this is finalised to ensure that all operational, access, lands and heritage issues are properly addressed within the final proposal".

Response: SDCC will liaise/consult with Waterways Ireland throughout the Detailed Design Stage of the project.

Issue 2 Receipt of notification.

Submission by:

HSA, NRA, NTA & IAA

Comment:

Acknowledgement of receipt of correspondence / notification.

Response:

No response required.

Issue 3 Affect on otters.

Submission by:

Mr. Brian Keeley, South Dublin Conservation Society, Mr and Mrs Power.

Comment:

This comment raises the following points regarding the otter habitat;

- Otter movement along the Grand Canal and their ability to move into urban Dublin,
- there should be no interruption to the ability of this species to move between resting places and feeding sites,
- concern that otters may be affected by modifications in the vicinity of the Grand Canal
- the Grand Canal is a proposed National Heritage Area and is a wildlife corridor the proposal to widen the north east side road (towpath) and culverting of the mill race will disturb the otter.

Response:

There is no movement of otters through the 12th Lock, as the Lock itself forms a barrier to movement of otters up and down the canal. The proposed bridge widening will therefore have no impact on this situation.

There are currently barriers on the line of the mill race, which restrict movement of mammals, including otters. It is intended, where appropriate and subject to agreement with Waterways Ireland and other relevant riparian owners, to remove these barriers so as to allow free movement for mammals. It is also intended to construct a mammal pass under the R120 in the vicinity of the 12th Lock bridge as part of the scheme.

As a further mitigation measure to preserve the millrace habitat, it is proposed to relocate the new vehicular access to the NE towpath / former Univar site, north of the existing millrace.

Issue 4 Removal of two old properties

Submission by:

South Dublin Conservation Society

Comment:

This comment raises the following points regarding the removal of two old properties adjacent to the bridge,

- whether consideration was given to alternative routes,
- that no specific reason was given for need to demolish the buildings
- the submission includes a suggested alternative road alignment to avoid the need to remove the two old properties.

Response:

The proposed scheme involves the **on-line** improvement of the existing road in the vicinity of the 12th Lock bridge, to tie in with the already upgraded R120 at the railway bridge, a short distance to the north

Other alignments were deemed not to be feasible due to excessive costs (land acquisition, additional road /bridge construction), in going either east of the Pitch & Putt Club or west of Lucan Sarsfields GAA Club. Alternative routes would require a new crossing of the Grand Canal with potential impacts on same and would also result in business premises (Maxol garage and Adamstown Industrial Estate) being bypassed with significant impact on their operations and viability.

The alternative layout suggested in the submission essentially retains the existing road alignment and does not address junction sight-lines (to the right) and results in access / egress arrangements that do not meet current design standards. The alternative layout further results in vehicular traffic remaining on the 1770's original arch bridge.

The configuration of the existing 12th Lock bridge presented a traffic hazard arising from sub-standard horizontal and vertical alignment, stopping site distance, junction visibility, and the location of four towpaths with deficient sight-lines. As a result a one-way system with traffic light control is currently in operation at the location in order to overcome these issues. The Part 8 Proposal addresses this issue by realigning the approaches to the bridge eastwards to safely accommodate 2-way traffic together with pedestrian and cycle facilities on both sides of the road. The proposal complies with geometric standards, which satisfy requirements in respect of sight lines from tow-paths and stopping sight distance.

In addition, the original 1770's arch bridge does not meet current design load standards. As the arch bridge is a protected structure it is proposed to retain it whilst removing all vehicular loading. The new road geometry described above, moving the carriageway slightly to the east also satisfies this objective. The alternative layout suggested in the submission results in vehicular traffic remaining on the 1770's original arch bridge, which as stated above does not meet current loading standards.

The aforementioned issues result in the local realignment the carriageway in the vicinity of the 12th Lock bridge to the east, impacting the footprint of the two properties in question and thereby requiring their removal.

A Cultural Heritage Impact Report was undertaken by Courtney Deery Heritage Consultancy and formed part of the Environmental Report prepared in support of the Part 8 Proposal. The Report stated that both properties '*were considered to be of local architectural heritage merit*'. The Report further states that '*none of the structures subject to impact i.e. those which will be removed by the proposed scheme, are of sufficient architectural heritage merit to require avoidance as part of the mitigation strategy*'. Comprehensive photographic records of both properties will be retained by South Dublin County Council.

Issue 5 Retention of wrought iron farm gate and lion's head water pump.

Submission by:

South Dublin Conservation Society

Comment:

The wrought iron farm gate and the lion's head water pump should be retained insitu, if possible.

Response:

As part of the Cultural Heritage Report the old field gate was photographed and its location marked on a map. No further mitigation measures were considered necessary.

It is proposed to remove the old field gate and water pump in advance of construction and they will be retained by South Dublin County Council. Consideration will be given to re-erecting the pump in a suitable location in the vicinity of the bridge.

Issue 6 Layout of cycletracks.

Submission by:

South Dublin Conservation Society.

Comment:

- Cycletracks should be on the road, including across the bridge.
- Cycle lanes should have right of way across entrances, side roads and gateways.
- Cycle lanes should not be shared with pedestrian paths as proposed on the north side of the bridge.
- There should be an advance stop zone on the road for cyclists at traffic lights.

Response:

In the interest of safety it is SDCC policy to specify off-road cycletracks where possible.

Cycletracks **will** transition from off-road to on-road across entrances and gateways and will have right-of-way. The bridge location is however unique in that a pedestrian/cycle crossing is proposed to accommodate pedestrians and cyclists on the R120 and on the Grand Canal Green Pedestrian and Cycle Route. This crossing facility requires pedestrians and cyclist to be off-road i.e. behind the kerb, in the vicinity of the crossing. Given the short length of the bridge crossing and the presence of four canal towpaths immediately adjacent to the bridge, it is proposed to keep cyclists off-road at this location.

There are currently no footpaths or cycletracks for a distance of 220 metres to the north of the 12th Lock Bridge. Geometric constraints and property impact

constraints (Lucan Pitch & Putt Course, recently refurbished Maxol Service Station, ESB sub-station) restrict the available roadway width immediately north of the 12th Lock bridge. A 6.5m carriageway with 2.5m shared footpath/cycletracks on either side of the road was specified for a distance of approximately 150 metres to the north of the bridge to accommodate these constraints.

There are no signalised junctions proposed as part of the scheme; however there are two pedestrian/cycle crossings proposed. Cyclists wishing to cross the road will utilise the pedestrian/cycle crossing facility. An advance stop or waiting zone is therefore not appropriate for the proposed pedestrian/cycle crossing facilities.

Issue 7 Combining of accesses in the vicinity of the 12th Lock bridge.

Submission by:

South Dublin Conservation Society.

Comment:

The comment relates to health and safety concerns in combining entrances as follows;

a) the exit for the Pitch & Putt Club, the SDCC property (former Univar site) on the NE side of the 12th Lock bridge and the NE canal towpath and
b) the NW towpath and the industrial premises on the NW side of the 12th Lock bridge.

Response:

a) North east of 12th Lock bridge.

Prior to commencement by SDCC of development of proposals for this road improvement scheme there were four accesses in close proximity to each other at the location in question. These were the Pitch & Putt Club, the former Univar industrial premises, a dwelling and the NE canal towpath. The close proximity of the four accesses posed a safety concern. The proposed Part 8 layout results in one access being provided, with sightlines to current standards, which will result in a safer environment for all road users. b) North west of 12th Lock bridge.

Currently traffic exiting the NW towpath or the nearby industrial premises is subject to sub-standard sightlines and rely on the one-way traffic light system and goodwill of drivers to exit onto the R120. The proposed Part 8 layout results in one access being provided, with sightlines to current standards, which will result in a safer environment for all road users.

Issue 8 Future traffic increases on the R120.

Submission by:

South Dublin Conservation Society.

Comment:

This comment concerns a statement in the Environmental Report that 'the proposed road improvement scheme will not induce increased traffic levels on the R120'. The comment states that 'some motorists would not be using this route at the moment because of poor road quality, narrow bridge and stop-and-go traffic lights. It would be logical to predict that there would be some increase in traffic if there were improvements made to the road. This would be increasingly likely as the more newly zoned industrial areas to the south of the canal are developed in the coming years'

Response:

The proposed scheme involves the improvement of the existing R120 and primarily involves improvement to its horizontal and vertical alignment, the inclusion of pedestrian and cycle facilities and public lighting. The traffic capacity of the R120 will not be increased.

Currently there are traffic lights at the 12th Lock bridge, which operate a one-way system under a stop-go arrangement for safety purposes. Delays at this location however are similar to any signalised junction, and the presence of the traffic lights / poor road quality is not considered to result in any reduction in traffic using the road.

Development of newly zoned areas in the general vicinity may in the future result in an increase in traffic on the R120, irrespective of whether the road improvement works were completed or not. Any such increase in traffic would be as a result of the new developments and not the removal of traffic lights at the 12th Lock Bridge or the proposed road improvement scheme to which this Part 8 Proposal refers.

Issue 9 Affect on Griffeen River and River Liffey.

Submission by:

South Dublin Conservation Society, Inland Fisheries Ireland.

Comment:

This comment relates to the impact on the River Liffey pNHA; The River Liffey is a proposed National Heritage Area, into which the Griffeen River flows. The Griffeen Valley Park is important for local wildlife and for enjoyment by the general public. These points '*should be taken into account when planning for mitigation against any silt entering the Griffeen River*'. On-site attenuation will be required at both the construction and operation stage. Precaution must be taken to ensure there is no entry of solids, during the connection of pipe work to the surface water system. Best practice must apply in respect of the use of cement, hydrocarbons etc. The short-term storage and removal/disposal of excavated material must be planned and managed such that the risk of pollution from these activities is minimised.

Response:

A Stage 1 Screening Report for Appropriate Assessment in accordance with the requirements of Article 6(3) of the EU Habitats Directive was prepared in support of the Part 8 Planning Proposal. This was included as Appendix 5 of the Environmental Report.

An Environmental Management System will be implemented during the construction stage, which will require strict procedures to be implemented and which will ensure that no construction material (cementitious material, concrete additives, petrochemicals etc) from the road site can be introduced to the Canal or River Griffeen waters.

Silt traps and oil interceptors will be installed on the new road drainage network, which will discharge to the Griffeen River. There will be no discharge of road drainage to the Canal system.

A Maintenance Procedures Manual for the completed road drainage system, including procedures for routine maintenance of gullies, surface water pipes, silt traps and oil interceptors, will be prepared and issued to South Dublin County Council for adoption and incorporation into their annual road maintenance programme.

Issue 10 Affect on crayfish and otter habitat in the Grand Canal millrace

Submission by:

South Dublin Conservation Society, Inland Fisheries Ireland, Mr. Brian Keeley, Mr and Mrs Power, Department of Arts, Heritage and the Gaeltacht.

Comment:

This comment concerns the impact that the proposal to culvert the millrace may have on the crayfish and otter habitat;

- Although not salmonid the proposal to culvert approximately 70 metres of millrace will reduce the ecological value, biodiversity and visual amenity of the watercourse.
- Have all other alternatives for the route been considered in terms of effects on the mill race and hence the otters and crayfish.
- Culverting of the mill race will disturb the otter and crayfish habitats.
- It would appear that the millrace has a definite degree of ecological merit and biodiversity valve. Serious consideration is recommended for a redesign of '*that section of the proposed design which will destroy the present natural status of the mill race and thus remove habitat of Protected Species and Annex II species of the Habitats Directive*'.

Response:

An assessment of the crayfish habitat present in the mill race was undertaken as part of the Part 8 Planning Procedure. In mitigation this assessment recommended translocation of the crayfish to the nearest suitable point on the Grand Canal.

Consultation with the Department of Arts, Heritage and the Gaeltacht (in particular the National Parks and Wildlife Service (NPWS)) resulted in the request for consideration of further mitigation measures to minimise the impact on the crayfish and otter habitat. As a result of these consultations the following mitigation measure is proposed:

It is proposed the revise the alignment of the access (to the former Univar site and northeast towpath) northwards so as to avoid disturbing the existing millrace. The NPWS is satisfied with the proposed mitigation measure, which ensures that the crayfish / otter habitat in question is maintained. A slide of the revised layout is available at the meeting.

Issue 11 Further Part 8 consultation process

Submission by:

South Dublin Conservation Society

Comment:

If this proposed plan for the Adamstown Road Improvement Scheme (R120) is changed at all after this consultation process then there should be a further Part 8 consultation process.

Response:

As a result of the submissions in relation to Issue 10 it is proposed to re-align the proposed northeast towpath in order to avoid disturbance of the canal millrace. There are no other changes proposed to the proposed plan as advertised. This realignment is a localised modification to the proposed plan as a further mitigation measure and would not warrant a further Part 8 consultation process.

Issue 12 Affect of pedestrian lights on bridge on wildlife.

Submission by:

Mr and Mrs Power

Comment:

The location of a pedestrian facility with flashing warning lights on the bridge would interfere with specially designed lighting for the Grand Canal Way, which recognises the adverse effect of light pollution on nocturnal wildlife, including otters.

Response:

Vehicular traffic currently use the existing R120 and lights from vehicles are therefore a common feature at the location in question.

Any public lighting or pedestrian/cyclist crossing proposals will be sensitively designed having regard to nocturnal animals.

Issue 13 No reference to the pNHA on the Part 8 Public Notice.

Submission by:

Mr and Mrs Power

Comment:

The Part 8 Public Notice displayed on the eastern side of the R120 and sited on an ESB pole between the Lock Bridge and the millrace makes no reference to the p.N.H.A.

Response:

The Part 8 Public Notice gives notice of the proposed provision by South Dublin County Council of the Adamstown Road (R120) Improvement Scheme and states that an Environmental Report has been prepared in respect of the proposed works and that it has undergone Appropriate Assessment Screening under the Habitats Directive (92/43/EEC). The Plans and particulars of the proposed development made available for inspection or purchase included numerous mention of the proposed National Heritage Area

Issue 14 Alternative Route.

Submission by:

Mr and Mrs Power

Comment:

An alternative route on currently undeveloped lands would filter regional traffic away from the GAA, Lucan Pitch & Putt, and the Wheelchair Association, facilitating a safer environment for the Grand Canal Way users. Road Safety Audits for all route options examined and publication of the Masterplan for the 12th Lock Area are crucial before making changes.

Response:

Other alignments were deemed not to be feasible due to excessive costs (land acquisition, additional road /bridge construction), in going either east of the Pitch & Putt Club or west of Lucan Sarsfields GAA Club.

Alternative routes would require a new crossing of the Grand Canal with potential impacts on same and would also result in business premises (Maxol garage and Adamstown Industrial Estate) being bypassed with significant impact on their operations and viability.

The current proposed road improvement scheme forms a fundamental building block for the development of the 12th Lock Masterplan. Particular regard will be paid to boundary treatment, landscaping and finishes in the vicinity of the 12th Lock which will complement 12th Lock Masterplan.

Issue 15 Increase in air and noise pollution, accidents, pedestrian facility not warranted.

Submission by:

Mr and Mrs Power

Comment:

This comment concerns the proposals for improvement works on the 12th Lock Bridge;

The designed speed limit of 50 kph with two way traffic and a pedestrian facility on the bridge, will increase noise and air pollution. Accidents were frequent at this location until installation of the traffic lights which currently have a traffic calming effect, by allowing one-way traffic over the bridge. The R120 Road Improvement Plan still leaves four roads coming up to the lock bridge, with no design solution offered. It is unlikely that the traffic warrant for a pedestrian facility could be attained at this time. Reverting to two-way traffic poses safety issues which must be addressed, particularly in light of previous experience.

Response:

Currently traffic at the 12th Lock bridge is stopped by traffic lights, which operates a controlled one-way system. Traffic has to restart from a stopped position with resultant increased noise and engine emissions. The proposed layout will eliminate this situation and will result in reduced noise and emissions at the location in question.

The 12th Lock bridge presented a traffic hazard prior to the introduction of the traffic light controlled one-way system, due to

- a) deficient horizontal and vertical alignments in the immediate vicinity of the bridge and
- b) inadequate junction sightlines, stopping sight distance and junction forward visibility.

The proposed Part 8 layout addressed all these issues and results in a road layout that conforms to current geometric design standards.

Submission by:

Mr and Mrs Power

Comment:

"In addition to original 12th Lock Bridge, widened in 1932, the proposed widening will cover the structure of the original larger specification lock, the only one of its kind remaining. Irreversible damage will be done to our built heritage if these works progress. The original lock chamber (Omer's) and bridge should be allowed to continue its role in the rich heritage of the 12th Lock environs."

Response:

This issue has been mitigated by utilising a bridge design that will not physically impact on the canal lock walls. The proposed widened bridge will utilise cast insitu piles located beyond the existing canal lock walls. The extended bridge will then span across the lock walls without any physical contact with, damage to or impact on them. The widened bridge will extend over the lock walls but the walls will remain fully intact and fully visible by users of the canal.

Issue 17 Embracing of the Dublin Canal Study 2010.

Submission by:

Mr and Mrs Power

Comment:

Various extracts from the Dublin Canal Study 2010 are mentioned and South Dublin Council are requested to *'embrace the vision and objectives of the Dublin Canal Study for the only canal in their area and especially the largely unspoiled 12th Lock environs. Above all short term sectional interests must be carefully evaluated*".

Response:

The proposed layout and mitigation measures will result in minimal impact on the Grand Canal. Measures are proposed that address all the issues mentioned in the extracts from Dublin Canal Study 2010 such as 'an improved canal corridor for people and wildlife' to enhance the 'function of the canals as wildlife corridor' etc. As mentioned earlier, the proposed pedestrian / cycle crossing at the bridge will link up with the recently completed Grand Canal Green Pedestrian and Cycle Route, (which runs along the south bank of the canal from the 12th Lock to Inchicore.) and will facilitate its future extension west to Gollierstown and Hazelhatch.

Issue 18 Impact on property of Tom Halpin.

Submission by:

Mr. Tom Halpin

Comment:

This comment concerns the proposed access arrangements to Mr Halpin's lightindustry premises;

As the proposed scheme provides for a retaining wall which will prevent access to his premises directly from the R120, Mr Halpin is objecting to the proposed alternative entrance arrangement off the towpath. He states that

- the proposal will not properly accommodate trailers up to 40 foot long, as ideally they should be perpendicular to the R120 for loading purposes
- access / egress to his property will be less safe than heretofore due to removal of the existing stop – go lights
- the proposal will have a detrimental effect on his business.

Response:

An examination of the existing premises shows that currently it is not possible for long articulated vehicles to enter the yard in question without crossing the centreline of the road. A 40 ft trailer with tractor unit parked in the yard perpendicular to the road would also extend beyond the western edge of the R120 and onto to road carriageway. As requested by Mr Halpin, South Dublin County Council is willing to enter discussions to discuss his concerns and address same.

Impact on Mr. Halpin's property, including the acquisition of the lands necessary for the scheme, will be matters to be addressed under the CPO.

Issue 19 Impact on Sanline Systems Ltd

Submission by:

Ms. Colette McLoughlin, Sanline Systems Ltd

Comment:

This comment concerns access arrangements to Sanline System's property along the northwest towpath;

- The existing exit from the northwest towpath onto the R120 is unsafe due to restricted visibility, and vehicles currently rely on the existing one-way traffic lights and goodwill of fellow drivers.
- Sanline Systems Ltd object to the removal of the existing one-way traffic lights, and a return to two-way traffic, as they consider it to be more unsafe than the present arrangement.
- Sanline Systems Ltd require continuous access to their premises.

Response:

The configuration of the 12th Lock bridge presented a traffic hazard arising from sub-standard horizontal and vertical alignments of the R120 in the vicinity of the bridge and the location of four towpaths with deficient sight-lines. As a result a one-way system with traffic light control is currently in operation at the location in order to overcome these issues.

The Part 8 Proposal addresses this issue by realigning the approaches to the bridge to accommodate 2-way traffic together with pedestrian and cycle facilities on both sides of the road. It also addresses the issue of restricted visibility and provides sight-lines in accordance with current design standards, particularly for traffic emerging from the tow-paths. The proposed layout therefore addresses the concerns of Sanline Systems Ltd.

Continued access to the northwest towpath will be maintained during the construction stage or alternative temporary arrangements to suit Sanline Systems Ltd will be arranged. At all times Sanline Systems will be consulted and issues agreed to meet their ongoing requirements.

5.0 Summary

The various works proposed under the Adamstown Road (R120) Improvement Scheme are in accordance with the 2010 - 2016 County Development Plan and with the proper Planning and Development of the area.

It is therefore proposed to proceed with the Adamstown Road (R120) Improvement Scheme subject to the following modification:

a) Re-alignment of the vehicular access to the former Univar site and northeast towpath in order to avoid the canal millrace.

The recommendation of the Area Committee will be brought to the County Council for decision.

A slide is available at the meeting.

APPENDIX 1 – MODIFIED PART 8 DRAWINGS

