Dandara Group Holdings Limited

Area Plan for the East: Evidence to Public Inquiry, September 2019 Land at Newtown, Santon (SH013)



Dandara Group Head Office Isle of Man Business Park, Cooil Road, Braddan, Isle of Man, IM2 2SA

Introduction

- 1. I am David Ian Humphrey, I am employed as a Senior Planner by the Dandara Group of Companies ("Dandara") and I am the Planning Director for Dandara Homes Limited. I hold a Batchelor of Arts degree in geography and a Masters degree in Civic Design from the University of Liverpool, and I am a Member of the Royal Town Planning Institute. I have worked as a professional planner on the Isle of Man for almost twenty-five years, the first seven of those as a Planning Officer for the Department of Local Government and the Environment.
- 2. The Cabinet Office (CO) of the Isle of Man Government has previously undertaken a "Call for Sites" exercise as part of the preparation of the Area Plan for the East, and Dandara has identified a number of sites which they wish to be considered for potential development through the Plan process. Following a further Preliminary Publicity stage the Cabinet Office then published a Draft Area Plan for the East along with supporting evidence papers, and invited feedback from interested parties and the general public. The Draft Plan and evidence papers have now been updated in the light of that feedback and are to be examined at Public Inquiry.
- The Draft Area Plan as published in May 2018 allocates a site at Newtown, Santon (SH013) for Predominantly Residential use. The CO now proposes (PIP 2, comment 340.10) that the site is "held back as Strategic Reserve". Dandara supported the original allocation of the site and now objects to the proposed change.
- 4. Dandara has submitted separate evidence to this Inquiry in respect of Strategic Reserves, population projections and housing demand & supply. We support the principle of identifying Strategic Reserve sites and concur with the reasoning set out by the CO in updated DP EP5 (final bullet point of para 6.1 and point x. of section 8.1). In this instance, however, we consider that SH013 should be allocated as a "specific site" for housing in order to help meet housing demand up to 2026 as set out in Dandara's evidence. This would help to meet local need for housing and provide flexibility and choice, as well

as creating an opportunity to provide facilities that could reduce the need to travel and enhance a sense of community.

- 5. The site is wholly within the ownership of Dandara and would be available for development immediately. It would represent a sustainable extension to an existing residential area and would be adjacent to the existing settlement boundary of Newtown¹. The site scores well against the criteria of the Site Assessment Framework and is in an appropriate location to meet identified housing need. In particular;
 - The site represents the only appropriate opportunity to meet local housing need in Newtown, including affordable housing and housing for elderly persons if required. Newtown is identified as a village in the Isle of Man Strategic Plan (IoMSP). Spatial Policy 4 of the IoMSP states that development in such settlements "should maintain the existing settlement character and should be of an appropriate scale to meet local needs for housing and limited employment opportunities". It goes on to state that "Area Plans will define the settlement boundaries of such settlements so as to maintain their existing character".
 - Allocation of the site for Predominantly Residential development would also allow consideration of whether appropriate community facilities could be provided in this location.
 - The site is deliverable in the short term (it would be available for development immediately).
 - A Statement on Access and Accessibility Issues for the site has been prepared by Bryan G Hall Consulting Civil and Transportation Planning Engineers². It concludes that there are no overriding highway constraints that would prevent the development of the site for residential purposes to provide some 65 dwellings, and that as such it would accord with the relevant access and accessibility policies of the Strategic Plan. The Statement has been reviewed since the publication of the Draft Plan and it has been concluded that there are no further

¹ A Site Plan is attached at Appendix 1

² A Statement on Access and Accessibility Issues is attached at Appendix 2

substantive points to be made as a result of advice contained in Manual for Manx Roads.

 A Landscape and Visual Appraisal is appended to this evidence and it concludes that development of the site would fit with the scale, landform and pattern of the landscape and that any impact upon visual amenity as viewed from adjacent areas would be limited and capable of being mitigated through design and layout³.

The Site

- 6. The site is predominantly comprised of fields 510455, 510456, 514236 and 514237 and is an area of approximately 3.8 hectares which immediately adjoins the existing residential area of Newtown, with a number of dwellings adjacent to the south eastern site boundary. Field 510455 has a boundary with the A5 New Castletown Road and is separated from the rest of the site by Clannagh Road. The areas outside of the Newtown settlement boundary are generally characterised by agricultural land interspersed with numerous private dwellings, with the golf course, hotel and residential areas of Mount Murray a short distance to the north.
- 7. The land is currently used for agricultural purposes, and slopes gently downwards from west to east. Existing hedgerows enclose the majority of the site and also mark the boundaries between fields. Field 514237 contains ponds and field drains which serve the surrounding land. A more detailed analysis of the site and its context is provided by the initial landscape and visual appraisal report which formed part of Dandara's Call for Sites response.

Planning History

- The site is within an area of "white land" (i.e. not zoned for development) in the extant Isle of Man Planning Scheme (Development Plan) Order 1982, and is shown to be within an Area of High Landscape or Coastal Value and Scenic Significance (AHLVSS).
- 9. In 1991 the Department published a series of Sector Plans which were intended to "update" the policies and guidance of the 1982 Development Plan;

³ A Landscape and Visual Appraisal is attached at Appendix 3

the Sector Plans were the subject of Public Inquiry but were not adopted by Tynwald, and they were published as Planning Circulars with a stated "lifetime" of five years. The proposal site is shown in Planning Circular 7/91 to be within an area of Proposed Residential use, but the Sector Plans are no longer a material consideration in the assessment of development proposals.

10. The majority of the site was the subject of PA 01/01243/A, which sought planning approval in principle for a residential development of 42 dwellings. The application was refused in January 2002, with the reasons for refusal referring to the land not being zoned for development (and being designated as AHLVSS), to the proposal being premature ahead of a comprehensive assessment of the wider area, and to the suitability of the Clannagh Road/A5 junction. The assessment of the site through the Area Plan process will address those reasons for refusal.

Assessment

- 11. Newtown is identified as a village in the Isle of Man Strategic Plan (IoMSP). Spatial Policy 4 of the IoMSP states that development in such settlements "should maintain the existing settlement character and should be of an appropriate scale to meet local needs for housing and limited employment opportunities". It goes on to state that "Area Plans will define the settlement boundaries of such settlements so as to maintain their existing character".
- 12. Dandara has identified a site at Newtown, Santon which is wholly within its ownership and which is capable of accommodating residential development to help meet identified housing need in the East, including affordable housing and housing for elderly persons if required. The development of the site would represent a sustainable extension to an existing residential area and would be adjacent to the existing settlement boundary of Newtown.
- 13. Access to the site can be provided from Clannagh Road, and land within field 510455 can be used to improve the junction of Clannagh Road and the A5 if necessary. It is noted that the CO now proposes to show the relevant part of field 510455 as "land for future road improvements and landscaped open space only" (PIP 2, comment 340.10).

14. The area is served by the public foul drainage system and surface water would be taken to a local watercourse. Field 514237 would be suitable for the provision of informal open space, and there would be the opportunity to provide further open space either within the defined site or on adjacent land to the north which is within the control of the Dandara group. It is noted that part of the site is shown to be within a Draft Area of Ecological Importance on Draft Map 1a Environmental Constraints and, notwithstanding the views of Dandara in respect of the proposed allocation of the site in the Draft Area Plan, the content of PIP 7 in respect of this site is noted. Any ecological interest is likely to be focused upon field 514237, with the remainder of the site currently or recently used as agricultural grazing land. As stated above field 514237 would be retained as informal open space – potentially as a wildlife site – and this is shown on the indicative landscape strategy plan which is appended to this evidence⁴.

Summary

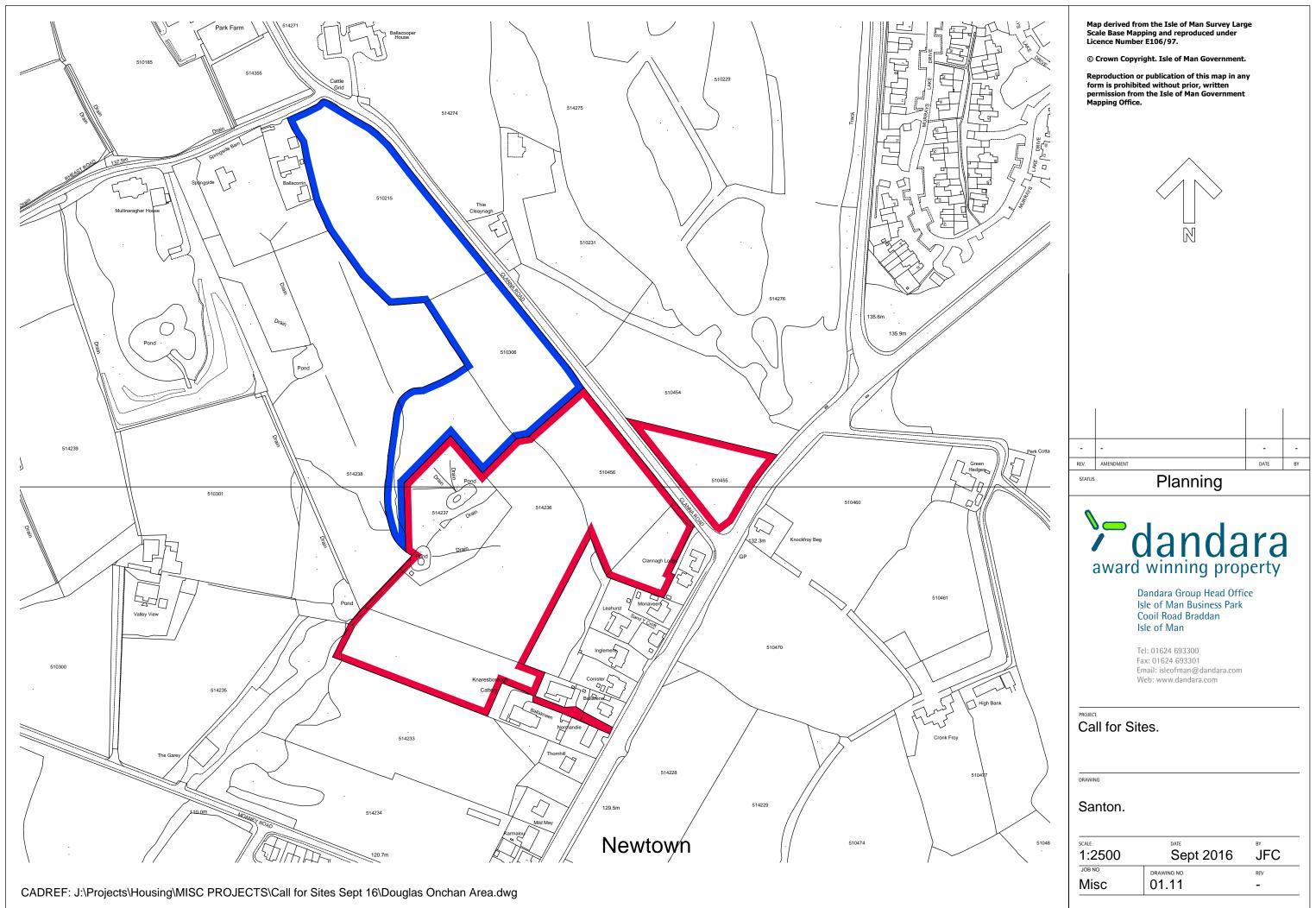
- 15. The Draft Area Plan of May 2018 proposes to allocate a site at Newtown, Santon (SH013) for Predominantly Residential use. The CO thus considers the site to be in a suitable location for new housing, and that its development would help to meet local needs and enhance the community without resulting in undue harm to the environment or residential amenity.
- 16. Notwithstanding this, the CO now proposes that the site should be "held back as Strategic Reserve" (PIP 2, comment 340.10). There is no suggestion from the CO that it no longer considers the site to be suitable for housing, simply that the timing of its release for such has been reconsidered.
- 17. Dandara has submitted separate evidence to this Inquiry in respect of Strategic Reserves, population projections and housing demand & supply. We support the principle of identifying Strategic Reserve sites and concur with the reasoning set out by the CO in updated DP EP5 (final bullet point of para 6.1 and point x. of section 8.1).

⁴ An indicative landscape strategy plan is attached at Appendix 4

- 18. In this instance, however, we consider that SH013 should be allocated as a "specific site" for housing in order to help meet housing demand up to 2026 as set out in Dandara's evidence. This would help to meet local need for housing and provide flexibility and choice, as well as creating an opportunity to provide facilities that could reduce the need to travel and enhance a sense of community.
- 19. On this basis it is recommended that CO's proposed change as outlined at PIP 2 comment 340.10 should not be accepted and that the allocation of the site for Predominantly Residential use as proposed in the Draft Area Plan of May 2018 be confirmed.

Appendix 1

Site Plan



Appendix 2

Statement on Access and Accessibility Issues





Land at Newtown

Statement on Access and Accessibility Issues

September 2016

LAND AT NEWTOWN

DANDARA

STATEMENT ON ACCESS AND ACCESSIBILITY ISSUES

Report by: David Bell MEng, CEng, MCIHT

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Ref: 12-186-004.04

September 2016

Introduction

- 1.0 This note considers the access and accessibility issues in relation to the development of land to the south of Clannagh Road, Newtown as part of the 'Call for Sites' submission by Dandara to the Area Plan for the East.
- 2.0 The land lies to the south of Clannagh Road with its main site frontage onto Clannagh Road with a secondary site frontage some 5.0 metres in length onto A5.
- 3.0 Strategic Policy 10, Transport and Communications, of the Isle of Man Strategic Plan, April 2016, sets out that new development should be located where it will minimise journeys, especially by private car, make the best use of public transport, encourage walking and not adversely affect highway safety for all road users. General Policy 2 of the Plan advises that proposed development within land use zones should incorporate safe and convenient access for all highway users, not have an unacceptable effect on road safety or traffic flows on the local highways and does not prejudice the use or development of adjoining land in accordance with the appropriate Area Plan.
- 4.0 The preamble to Transport Policies 1 and 2 advises that the location and nature of development influences the mode and extent of travel which is undertaken and therefore that development should be located within or contiguous to existing built up centres so that people will be encouraged to walk, cycle or use public transport, rather than private cars. Policies 1 and 2 then set out that new development should, where possible, be located close to existing public transport facilities and routes, including pedestrian, cycle and rail routes, and that their design should make provision for bus, pedestrian and cycle routes, including linking into the existing system.
- 5.0 Transport Policy 4 advises that both new and existing highways should be able to safely and appropriately carry the volume of vehicular and pedestrian traffic likely to be generated by proposed developments in accordance with the environmental objectives of the Strategic Plan.
- 6.0 The Area Plan for the East: Call for Sites, Draft Site Assessment Framework, July 2016 identifies that the Department of Transport's Hierarchy of the Island's Road Network is to be used for scoring system criteria but that this document will be superseded by the emerging Manual for Manx Roads and the detail of that criterion will be updated in due course.
- 7.0 In the absence of the publication of Manual for Manx Roads this Statement will consider the alternatives available for access to the site against the relevant Strategic Plan policies and the technical advice set out in Design Manual for Roads

and Bridges (DMRB) the Manx Roads design guide and Design Bulletin 32, a UK publication widely used by the Department for Transport in Isle of Man.

Description of the Roads Serving the Site

- 8.0 The land has site frontages onto both Clannagh Road and A5. Clannagh Road is not identified in either the Town or the Rural Hierarchies. A5 is identified as a Strategic Route on the map showing the Rural Hierarchy of Roads in the Department of Transport's Policy Relating to the Island's Road Network. It defines Strategic Routes as accommodating all traffic classes on an all purpose route between centres of population, with few junctions and outside built up areas, frontage access should be restricted.
- 9.0 Clannagh Road performs the function of a Local Road to the north of Newtown.There is a Manx hedge to the south west of the road along the site frontage with a highway verge. There is a Manx hedge and verge to the opposite side of the road.
- 10.0 Clannagh Road has a straight alignment and visibility is not restricted in the vertical plane and accommodates the two-way flow of vehicles. Along the site frontage the road is derestricted. Initial site observations indicate that vehicles approaching the site from the north do so at speeds of about 40mph. At the south eastern corner of the site Clannagh Road meets the A5 at major/minor priority controlled junction. At the junction there is ghost island right turn lane provision for vehicles turning right into Clannagh Road with a series of traffic islands in the central hatched area. The traffic island to the north of the Clannagh Road/A5 junction also provides an uncontrolled pedestrian crossing refuge for pedestrians crossing the A5 to access the southbound bus stop. A5 at the junction with Clannagh Road is subject to a 50 mph speed limit and there is footway to the northern side and grass verge to the southern side.
- 11.0 The available visibility for drivers emerging from Clannagh Road at a 2.4 metre setback is some 180.0 metres to the left and is over 200.0 metres to the right. The level of available visibility is above the recommended minimum distances for a road subject to a 50mph speed limit.
- 12.0 Some 160.0 metres to the south west of the Clannagh Road/A5 junction there is a site frontage connection at an existing private access some 4.5 to 5.0 metres in width. The access provides access to 2 no. existing properties. At this location to the north side of A5 there are off carriageway parallel parking bays and a footway with a grass verge to the south side.



Consideration of Access Options

15.0 Advice relating to the design of residential roads and the recommended road hierarchy is set out in Manx Roads. This document defines a 'Major Road' as a road forming the primary framework for residential zones and states that:

> 'The size of development that can be served by this road will depend on the layout and the number of connections to the main distribution road system. No section of the road should take traffic generated by more than 300 dwellings and no connection to the distributor roads more than 200. On a road serving more than 100 and up to around 300 dwellings two points of access should be provided and the road layout should conveniently connect these points of access. Where only one point of access is available the road layout should form a circuit and there should be the shortest practicable connection between this circuit and the point of access.'

16.0 The interpretation of this advice is that a 'Major Road' which has a carriageway width of 5.5 metres can serve up to 100 dwellings in the form of a cul-de-sac. This guidance reflects that set out in the UK's Design Bulletin 32 which states that:

'The road layout should be designed to help minimise risks of access problems for the emergency services and residents arising as a result of vehicle breakdown, road maintenance or the need to gain access to services underground. While none of these events are likely to occur very frequently they may block access or cause inconvenience unless means can be found to by-pass them.'

It goes on to set out that:

'Risks from such problems arising can mainly be reduced by providing alternative means of vehicular access —either permanently or for use in an emergency. This should be the aim wherever the road layout serves a significant number of dwellings.'

17.0 Applying these principles, the Bulletin sets out general guidance and suggests that a road serving up to around 50 dwelling may be a cul-de-sac, or:

'....a road serving more than around 50 dwellings and up to around 100 dwellings should preferably be a loop or through road, or at least have a footpath link for use by vehicles in an emergency.'



- As described above, access is available from Clannagh Road with A5 providing the opportunity for non motorised access. By the provision of a 5.5 metre wide 'Major Road' access can be limited to one point, as indicated, if required.
- 19.0 The Department of Infrastructure Policy and Rationale Relating to Highways, Transport, Drivers and Vehicles – November 2013, provides general advice for new development on rural and urban roads. For accesses onto Local Roads in rural areas, the design criteria should be based on the UK Design Manual for Roads and Bridges and Planning Policy Guidance 13 (UK DoE, DoT 1994) PPG13. DMRB and PPG13 recommend for a speeds up to 62.5 mph, visibility splays of 4.5 metres x 215.0 metres. Vehicle approach speeds from the south will be restricted to typically 20 mph to 30mph by the presence of the Clannagh Road/A5 junction. For speeds up to 31.25 mph the recommended minimum major road distance is 70.0 metres.
- 20.0 A visibility splay of 2.4 metres x 45.0 metres would therefore be required to the north of any new give-way junction and 2.4 metres x 70.0 metres to the south. There is sufficient site frontage to achieve this level of visibility within the land identified for residential purposes and under the control of Dandara. A footway can also be constructed along Clannagh Road within either highway or land under the control of Dandara that will connect into the existing footway provision on A5.

Accessibility by Alternative Modes of Transport to the Private Car

21.0 The nearest bus routes and stops are located on A5 some 160.0 metres walking distance from the site. As noted earlier there is an uncontrolled pedestrian refuge island on the A5 to assist pedestrians crossing the carriageway to access the bus stops. A summary of the available services and the combined service frequency is shown in the table below:

Table 1: Bus Services and Frequencies



Service	Variation	Route	Frequency (mins)		
			Monday to Friday	Saturday	Sunday
1	1	Birch Hill - Promenades - Douglas - Airport - Castletown - Colby - Port Erin/Port St Mary	Every 20 minutes incl at peak times	Every 20 minutes	Every 20 minutes
	1H	Hospital - Hailwood Avenue - Promenades - Douglas - Airport - Castletown - Colby - Port Erin			
2/2A	-	Ballachrink - Promenades - Douglas - Airport - Castletown - Shore Road - Port St Mary/Port Erin			
11	-	Birch Hill - Rosemount - Douglas - Airport - Castletown - Colby - Port Erin/Port St Mary			
12	12	Birch Hill - Promenades - Douglas - Airport - Castletown - Colby - Port Erin/Port St Mary			
	12A	Birch Hill - Promenades - Douglas - Airport - Castletown - Shore Road - Port St Mary/Port Erin			

22.0 The site is located within a 1.0 kilometre walking distance of the following services/facilities:

- Methodist Hall
- Indoor sports facilities (Mount Murray, Ballavartyn Equestrian Centre)
- Public park (Ballanoa)
- School Bus Route
- 23.0 There is existing footway provision surrounding the site that will promote pedestrian trips to/from the site. Footways will be provided on Clannagh Road that will connect with the existing footway on the A5 and a pedestrian connection could be provided onto A5, Newtown at the site frontage.



24.0 The site is therefore well placed for its residents to safely walk or cycle to local facilities, or use the local bus services to more distant destinations without the need for them to use cars.

Conclusions

- 25.0 Having regard to the policies of the Strategic Plan and the aims and objectives and the design principles set out in both Manx Roads and Design Bulletin 32 a suitable access arrangement can be achieved in a safe and appropriate manner.
- 26.0 Access can be achieved from Clannagh Road with non-motorised access also available directly onto A5 within Newtown. The Clannagh Road/A5 junction is of a sufficient standard to accommodate the development generated trips.
- 27.0 The site is located in a sustainable location that will promote opportunities to travel by foot, cycle or public transport.
- 28.0 It is concluded therefore that there are no overriding highway constraints that would prevent the development of the site for residential purposes to provide some 65 dwellings. The land would therefore accord with the relevant access and accessibility policies of the Strategic Plan.



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Landscape and Visual Appraisal

Site Ref: Newtown

Site Area and Current Use

The site comprises of approximately 3.8 hectares and is currently used for agricultural purposes, principally pastoral in nature. It is located north of the existing residential development at Newtown and adjacent to properties along the A5 road, bordering the proposed site.

Topography

The site is located within a broad valley. A gently undulating natural landform gradually slopes from approximately 130m AOD in the southeast corner of the Site, to approximately 120m AOD in the northwest.

Boundaries

Boundaries to the Site comprise a combination of mature hedgerows (particularly along the eastern boundary of the Site), garden boundaries (associated with properties to the south), scrubby, indistinct boundaries (associated with the northern boundary of the Site) and Manx drystone walls and post and wire fencing (along the southeast boundary with the A5 road)

Adjoining Land Uses

Adjoining land uses are varied, with the predominant land use comprising agriculture (both arable and pastoral). Pastoral fields in the surrounding area, and on the Site itself, exhibit a mix of habitat types, including some areas of scrubby Gorse and Broom dominated habitat. Residential built form is present in the form of a linear development associated with the A5 road. In addition, Mount Murray golf course is present approximately 60m at the closest point to the east of the Site.

Current Planning Designations

In the 1982 Isle of Man Development Plan the site is shown lying within an Area of High Landscape or Coastal Value and Scenic Significance.

Local Landscape Character (Isle of Man LCA 2008) Landscape Character Type: D – Incised Slopes

Landscape Character Area: DI3 – Santon

Key Characteristics:

- A predominantly rural landscape, dissected by A5 and A25 roads.
- Densely wooded valley bottoms amongst undulating rolling land with large rectilinear arable and pastoral fields on the gently sloping hill sides and rounded tops.
- Steep sided densely wooded Victorian Pleasure Glens of Glen Grenaugh and Port Soderick Glen lead down to the coast.
- Victorian electric railway line and stations run through the area at the bottom of Crogga Glen.

- Fragmented woodland along field boundaries and along tracks that access the scattered farm houses centred around Quine's Hill (along the A25) and small settlements of Santon and Ballaveare.
- Sea-facing hill slopes with large open fields running along the cliff tops with gorse, heather and bracken along the cliff top periphery.
- Incinerator chimney forms notable landmark in the immediate area.
- Presence of Manx milestones.
- Abrupt linear southern built edge to Douglas, comprising residential and industrial development with minor localised extension of industrial character into character area south of Cooil Road.
- Pulrose Golf Course on edge of Douglas.

Proposed Landscape Strategy (Isle of Man LCA 2008)

'The overall strategy should be to conserve and enhance the character, quality and distinctiveness of the area, with its wooded valley bottoms and wooded horizons, its scattered settlement pattern, its Victorian pleasure glen and the railway.'

Landscape Character Appraisal:

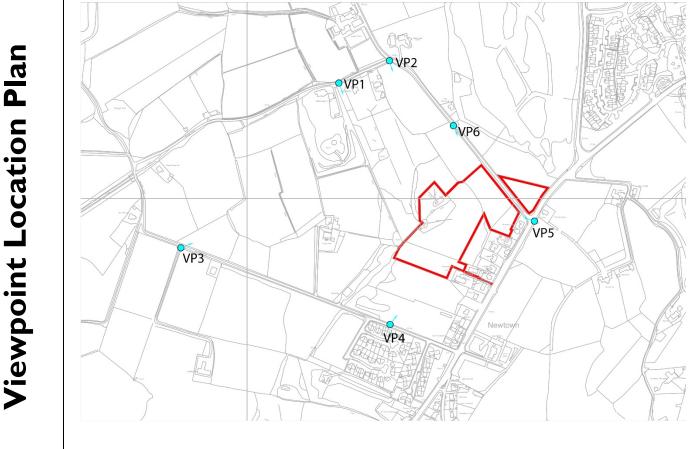
The Site lies within the Landscape Character Area of Santon Incised Slopes. As described within the IoM LCA 2008, this LCA is characterised by rural, agricultural uses, softened with hedgerows and banks on a landscape of undulating topography with gently sloping hillsides and rounded hilltops. Although the site itself is rural in nature, comprising of pastoral fields and scrub, the adjacent residential development to the south and the busy A5 road, impart a residential characteristic on the Site. The Site itself does not reflect a strong individual landscape character, given the numerous influences adjacent to it, the lack of consistently strong boundaries, and the presence of scrub and moorland habitat within the pastoral fields.

Conclusion in respect of Landscape Character (Criterion DC.7)

Green: Development of the Site would fit with the scale, landform and pattern of the landscape.

Key Visual Receptors:

- Road users along the A5
- Road users along nearby roads, including Clannagh Road, Rheast Road and Moaney Road
- Residents of Newtown, along A5 and Moaney Road
- Users of nearby footpaths



Key Views (identified in the Isle of Man LCA 2008)

- Open and expansive views from higher areas along the rugged coast in the east and inland towards the upland areas over Braaid.
- Incinerator chimney forms a notable landmark in the immediate area.
- Glimpsed views framed by vegetation in the valley bottoms and along the main roads where they follow the wooded valley bottoms.
- Views in the northern part of the area up to the Transmitting Masts on top of Douglas Head hill top.
- Views from Isle of Man Steam Railway.

Visual Amenity Appraisal:

The proposed site would be visible in places, but within a contained proximity to the Site. Visual effects as a result of the development of the Site would principally be experienced by road users in glimpsed views along the A5, Clannagh road and Moaney road, by residents along the A5, Moaney Road and Rheast road, and by footpath users in proximity to the Site (glimpsed views from footpath leading from Moaney road).

The pattern of the landscape includes blocks of woodland, intermittent areas of scrub and structure planting associated with Mount Murray Golf Course. The gently undulating topography, in combination with vegetation and built form in the vicinity, results in views towards the Site being generally contained and short to medium distance. Any development of the Site would be viewed in the context of the existing residential built form along the A5 and Moaney Road, and would likely be further screened and softened by any associated landscaping as part of any proposed scheme.

Conclusion in respect of Visual Amenity (Criterion DC.8)

Yellow: Development would have limited impact on visual amenity as viewed from adjacent land uses such as residential areas, public footpaths or recreational areas but could be mitigated through design and layout.

Approximate location of proposed development



Viewpoint No. 1 (View looking south, southeast from Rheast Road. Located approximately 330m north of the Site)



Approximate location of proposed development

Viewpoint No. 2 (View looking southwest from corner of Rheast Road and Clannagh Road. Located approximately 300m north of the Site)



Appendix 1 -Sheet 1 of 3 Site Viewpoint Photographs

Date: August 2016 Drg no.: 11287_PL_001 Drawn: CM Checked: MK

Approximate location of proposed development



Viewpoint No. 3 (View looking southeast towards the Site from Moaney Road and footpath. Located approximately 460m from Site)



Approximate location of proposed development

Viewpoint No. 4 (View looking northeast from Moaney Road. Located approximately 145m from Site)



Newtown Site Appraisal Viewpoints

Appendix 1 -Sheet 2 of 3 Site Viewpoint Photographs

Date: August 2016 Drg no.: 11287_PL_001 Drawn: CM Checked: MK Approximate location of proposed development



Viewpoint No. 5 (View looking west from A5 road. Located approximately 15m from Site)

Approximate location of proposed development



Viewpoint No. 6 (View looking southwest from Clannagh Road, located on eastern boundary of Site)

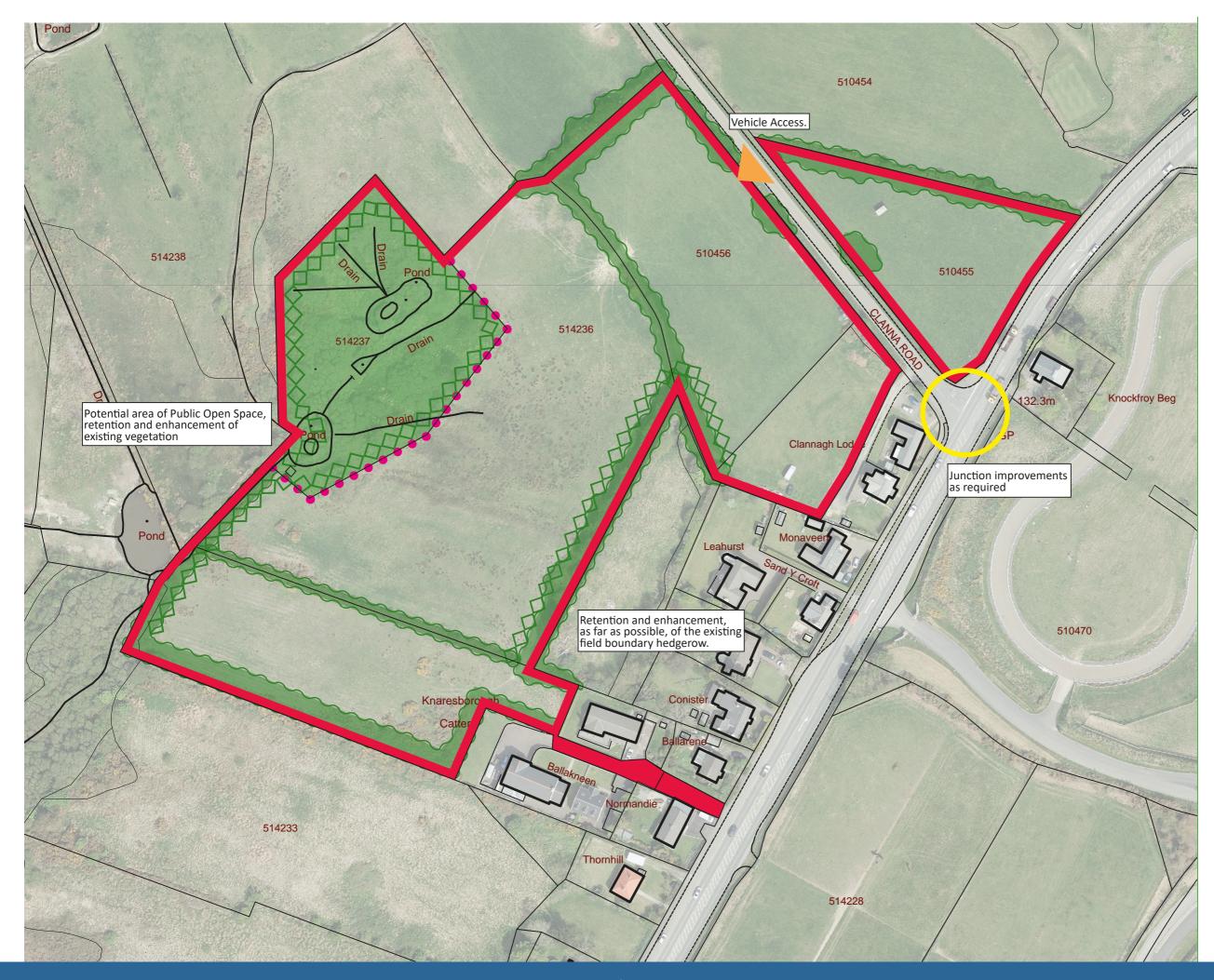


Newtown Site Appraisal Viewpoints

Appendix 1 -Sheet 3 of 3 Site Viewpoint Photographs

Date: August 2016 Drg no.: 11287_PL_001 Drawn: CM Checked: MK Appendix 4

Indicative Landscape Strategy Plan





LEGEND



Red line boundary

 \diamond

Existing vegetation

Potential access point

Proposed boundary enhancement

Proposed public open space

Junction improvement