



Development	Demolition of house and construction of 4 bed dwelling with lower ground, first and second floors and associated site works.
Location	5 Marine Parade, Sandycove, Co. Dublin
Planning Authority	Dun Laoghaire Rathdown County Council
Planning Authority Reg. Ref.	D20A/0800
Applicant(s)	E. Elliot c/o Tango Medic SLU
Type of Application	Permission
Planning Authority Decision	Refuse
Type of Appeal	First-Party
Appellant(s)	E. Elliot c/o Tango Medic SLU
Observer(s)	Catherine Fidgeon
Date of Site Inspection	13 th October 2020
Inspector	Suzanne Kehely

1.0 Site Location and Description

- 1.1. The appeal site of .46 hectares is located at the periphery of the built-up environs of Glasthule as it is situated on a coastal road overlooking Dublin Bay to the north. A grass open space (Newtownsmith Park) is situated between the shore and the road fronting the development. The road is aligned and segregated with provision for a two-way cycle path and a one-way vehicular carriage way.
- 1.2. The site is in the middle of a row of three houses with similarly aligned building lines and with direct access onto Marine Parade. The site to the rear features mature planting and stone walls. The terrain to the rear of the site is elevated and there is a variety of building styles and scales that back onto the site from Glenageary Road. Similarly there is variety of house styles and setbacks along the coast in the vicinity of the site. To the east there is a six-storey apartment development with surface parking along its western boundary.
- 1.3. The existing two storey house on site has a pitched roof and an overall ridge height of 6.668m (11.64mOD) and is presently laid out with a living kitchen study and one bedroom at ground level and three bedrooms with balcony at first floor level. The house extends the width of the plot at 9.574m. It is c. 15m deep.

2.0 Proposed Development

- 2.1.1. The proposed development comprises the following:
 - Demolition of house.
 - Construction of a 4-storey house of 393sq.m. with a sunken ground level which is substantially below garden level to the rear. Floor levels are described as Lower Ground, (4.4m OD) Upper Ground (7.18mOD), 1st Floor 10.28mOD, and 2nd Floor 12.98mOD [**Note:** This report uses these floor level descriptions whereas the planning authority refers to 0-4 levels.]
 - The parapet height is stepped at 10.53mOD and 13.68mOD and with a maximum roof height at 16m OD.
 - Solar panels are proposed on top of the flat roof.

- The architectural style is contemporary, and finishes are predominantly render with copper cladding and dark framed aluminium windows.
- Opaque glazed screen is proposed on each side of the upper ground level floor patio at 7.18mOD which steps down to the rear garden
- The 2nd floor terrace and roof are proposed to be planted with sedum. A small, paved terrace is proposed to the rear and is buffered on each side by the sedum roof and glazed.
- The application is accompanied by an Architect's Design Statement, sunlight and daylight shadow drawings, CGIs, a site-specific Flood Risk Assessment and a construction management plan

Revised drawings

- The plans have been revised in drawings submitted to the Board as a part of the grounds of appeal. These drawings include a reduced top floor by 15 sq.m. and they are presented as an option, however the original plans are the applicant's preference.

3.0 Planning Authority Decision

3.1. Decision

3.1.1. The Planning Authority decided to refuse permission for the stated reason:

- The proposed development by virtue of its design, scale, height, and massing would represent an overdevelopment of this site. The proposed development would be contrary to section 8.2.3.1 Quality Residential Design of the development plan. It would result in a significant loss of residential amenity to adjoining properties in terms of privacy resulting from overlooking and the overbearing scale and massing of the design. The planning authority concludes that the proposed development would have a detrimental impact on the existing residential amenity of the neighbouring properties being visually dominant and incongruous. It is considered that the proposed development would contravene the zoning objective which is A to protect and/or improve residential amenity would seriously injure the residential and visual amenities of the area and depreciate the value of property in the vicinity and would therefore be contrary to the proper planning and development of the area .

3.2. Planning Authority Reports

3.2.1. Planning Reports

The report refers to :

- Planning history on subject and adjacent site.
- Preplanning meeting. (Details in pouch at back of file).
- Development plan guidance and policies:
 - Densification policy (section 2.1.3.4)
 - Residential development standards - sections 8.1, 8.2, (8.2.3.1, 8.2.3.2)
 - Section 8.2.3.4 regarding additional accommodation in built up areas.
 - Section 8.2.4.9 regarding car parking, hardstanding, and entrances.
 - Section 8.2.8.4 regarding private open space.
- No justification for demolition.
- Proposal Detracts from the streetscape characterised by smaller scale detached properties in a sylvan setting and would detract from visual amenities due to impact on view form approaching site and form neighbouring properties.
- Insufficient setback for planting along boundary to soften interface.
- South facing balcony at penthouse level (3rd floor) would give rise to overlooking.
- In conclusion the proposal would is overbearing and incongruous and contravenes policy regarding high quality design for urban areas such as demanded in this location.
- Concerns of drainage division need to be addressed in future consideration.
- Concerns of Transportation authority need to be addressed in future consideration
- No AA or EIA issues.

3.2.2. Other Technical Reports

- Drainage Division - Engineering Department - Concerns raised regarding the road level at 3.8m OD and flood event at .30m above this and the adequacy of 4.6mOD FFL. Further information required regarding flood prevention and updated SSFRA.

- Transportation Planning Division – Further information required regarding entrance width, car park layout and protruding boundary wall and its interface with public footpath.

3.3. **Prescribed Bodies**

- Irish Water – no report

3.4. **Third-Party Observations**

- None.

4.0 **Planning History**

4.1. **The site**

- 4.1.1. D03B//0716 refers to a domestic extension and roof lights at 5 Marine Parade
- 4.1.2. Bord Pleanala ref. 308454 refers to a concurrent appeal against refusal for demolition and substantial reconstruction/ extension

4.2. **Adjacent sites**

- 4.2.1. PA ref D16B/0233 refers to permission for 1st floor window to front gable and 3 rooflight on side slopes of roof at 4 Marine Parade
- 4.2.2. Bord Pleanala ref. 305824 refers to permission for a c. 66sq.m. extension at Monread Marine Parade (a semi-detached house three plots to the west

5.0 **Policy & Context**

5.1. **Development Plan**

- 5.1.1. The objective for the site is 'To protect and/or improve residential amenities.' (Zone A)
- 5.1.2. Section 8.2.3.4 (xiv) refers to demolition and replacement dwelling in the context of building strategy.

The Council will sometimes state a preference to retain existing houses that, while not Protected Structures, do have their own merit and/or contribute beneficially to the area in terms of visual amenity, character and/or

accommodation type. Demolition of an existing house in single occupancy and replacement with multiple new build units will not be considered simply on the grounds of replacement numbers only but will be weighed against other factors. Better alternatives to comprehensive demolition of, for example, a distinctive detached dwelling and its landscaped gardens, may be to construct structures around the established dwelling and seek to retain characteristic site elements. In larger proposals for demolition of existing structures, the balance between the greater energy efficiency ratios of the new build, its size for running costs/impacts, and resources used for its construction - and those of the existing dwelling and the 'embodied energy' lost in its demolition, will be considered. The Planning Authority will assess single replacement dwellings within an urban area on a case by case basis and may only permit such developments where the existing dwelling is beyond repair due to structural defects. For all applications relating to replacement dwellings, a strong justification / rationale shall be provided by the applicant.

Applications for replacement dwellings shall also have regard to Policies AR5 and AR8 (Sections 6.1.3.5 and 6.1.3.8). In this regard, the retention and reuse of an existing structure will be encouraged over replacing a dwelling. Applications for replacement dwelling within the rural area will be assessed under the provision of Section 8.2.3.6(iv).

- 5.1.3. Section 8.2.4 (ii) refers to extensions.
- 5.1.4. **RES4** states that it is Council policy to improve and conserve housing stock of the County, to densify existing built-up areas, having due regard to the amenities of existing established residential communities and to retain and improve residential amenities in established residential communities.
- 5.1.5. **Section 8.1.1.1. Urban Design Policy UD1** sets out that all development is of high-quality design that assists in promoting a 'sense of place'. The promotion of the guidance principles set out in the 'Urban Design Manual - A Best Practice Guide' (2009) and in the 'Design Manual for Urban Roads and Streets' (2013).
- 5.1.6. **Section 8.2.3.4 (vii)** refers to infill sites. Such proposals shall be considered in relation to a range of criteria including respecting the massing and height of existing residential units.

- 5.1.7. **Section 8.2.3.1** refers to the objective of the Council to achieve high standards of design and layout and to foster and create high quality, secure and attractive places for living.
- 5.1.8. **Section 8.2.3.5** refers to the general requirements for residential development including habitable room sizes.
- 5.1.9. **Section 8.2.4.9 (i)** refers to the minimum width of 3m and maximum of 3.5m required for vehicular entrances.

5.2. **Natural Heritage Designations**

- 5.2.1. The nearest European site is Dalkey Island SPA (site code 004172), less than 2km to the east of the site.

5.3. **Environmental Impact Assessment - Preliminary Examination**

- 5.3.1. Having regard to the limited nature and scale of the proposed development and the absence of any connectivity to any sensitive location, there is no real likelihood of significant effects on the environment arising from the proposed development. The need for environmental impact assessment can, therefore, be excluded at preliminary examination and a screening determination is not required.

6.0 **The Appeal**

6.1. **Grounds of Appeal**

A first-party appeal has been lodged by the applicant:

- The house is substandard by reference to current building regulations standards and makes no architectural contribution to the area. The proposal will enhance the visual amenities of the area.
- The height is consistent with other permitted development in the area.
- It is not overdevelopment and the approach of expanding space and consolidating use of the site is consistent with sustainable urban development policy.

- It is a high-quality design which defers to its prominence and setting along a promenade. Elevation drawings and montage illustrate this and also include the 6-storey building.
- Letter of support from owners of no.6 is appended.
- Policies AR5 and AR8 and guidance for replacement dwellings is interpreted to apply to buildings of particular architectural or local interest and are not applicable in this instance.
- This will set a precedent for quality development for adjacent sites over the longer term. Adjacent owner intends to redevelop. In this way proposal will contribute to rejuvenation.
- The house is from the 1970s and is of its time.
- The proposal flood defence design measures exceed requirements.
- Consultants engineers report confirms flood risk prevent measures are within acceptable range for the site.
- There will be no significant overshadowing due to a combination of setbacks and orientation.

6.2. Planning Authority Response

- No further comments to original report.

7.0 Observations

7.1. C. Fidgeon

An observation has been made by the owner of the adjacent property at 4 Marine Parade and issues raised refer to:

- No intention of redeveloping no.4. Bungalow will remain as it is at present. The statements by the applicant in relation to future proposal for no.4 are untrue.
- An objection was not submitted directly to the Planning authority and comments were missed at that time.
- The Planning authority's comments about detrimental impact are notable.
- Daylight into two ground floor side windows will be obstructed by the proposal at 1m away.

- The first-floor wall dwarfs the bungalow and overshadows Velux rooflights.
- The overbearing nature of first floor could be reduced by an increased set back.

8.0 Assessment

8.1. Issues

8.1.1. This appeal relates to a proposal for demolition of a 1970 two storey detached dwelling and its replacement with a larger dwelling of 368 sq.m over four levels.

From my inspection and review of the file, the key issues centre on:

- Principle
- Streetscape
- Residential Amenity
 - Overlooking, overshadowing
 - Visual/overbearing
- Other matters: Drainage and Car Parking/access/frontage

8.2. Principle

8.2.1. The existing house is on a relatively large site at .42 hectares in a built-up residential area along the seafront at Sandycove in Dun Laoghaire. The area is zoned for residential development and accordingly a residential use is consistent in terms of land use. The application is essentially seeking a larger and more modern house compliant with energy efficient building technology. There are two aspects that potentially restrict this type of development in principle and they relate to demolition of a habitable house and expansion.

8.2.2. In the case of demolition the planning authority holds the view that insufficient justification has been made notwithstanding the further comments in the grounds of appeal. I note that the development plan policy seeks justification on all types of demolition however the primary focus is to protect buildings of character in the interest visual amenity and conservation. Enhanced building efficiency is also another consideration in development plan policy. In this case the application is to replace a 1970s dwelling which includes a garage conversion. The architectural statement as reinforced by the planning and development consultants reaffirms that

the existing house is not of architectural significance in its contribution to the character of the area and that the proposal is for a higher specification and well considered higher design quality. From my inspection of the house and its surrounding area I concur that the house does not warrant protection and that it is not in my judgement of a quality to warrant protection by reference to development plan policy. The applicant further justifies the larger property as a form of densification and therefore compliance with strategy spatial policy. However in this regard I interpret policy to mean a higher density of units whereas this is simply for a larger house. I consider this basis of justification is therefore not wholly applicable. I would however point out that in support of the application it seeks to expand accommodation by a vertical extension which does accord with efficient land use. Furthermore the incorporation of different levels and a lift allows for both insulation and adaptability for future use thereby, ensuring longevity of the proposed build.

8.2.3. I therefore conclude that the principle for a replacement house on the subject site in this instance does not conflict with the council policy to improve and conserve housing stock and is consistent with its building strategy, however the detailed design is predicated on its compatible integration with the streetscape and surrounding development.

8.3. **Streetscape**

8.3.1. The planning authority considers the proposed development to be visually incongruous primarily by reason of height, scale and massing and accordingly not to be of an acceptable urban design quality for the location and immediate context of the site. The applicant however makes the case that the context of up to six storey high development as part of a contextual mix of building typology, supports a unique design approach. While the immediately adjacent two storey dwelling, and dormer dwelling are lower in height it is argued that the proposed four storey high dwelling will set a new standard without being unduly incongruous with the wider setting. In support, the owner of the dwelling to the east indicates an intention to redevelop the house site with a higher building. However the owner of no.4 on the other side categorically confirms, contrary to applicant's assertions that this is not the intention for their dormer bungalow to the west.

8.3.2. On balance I consider the design with an overall frontage height of c. 11.5m (16mOD) which incorporates a tapered roof level to not be incongruous when taking account of the varying forms and taller heights along the coastal frontage together with the backdrop of moderately elevated development along Glashule Road to the south - rear. Furthermore, the massing and profile I consider present an elegant frontage and particularly as revised and are I consider compatible with the wider setting. Moreover I consider that it would contribute beneficially to the area in terms of architectural character, visual amenity and the creation of a strong promenade frontage.

8.4. Residential Amenity

8.4.1. The increased massing and height together with the juxtaposition of new private terraces generates two aspects to impact on amenity. The first relates visual amenity and overbearing impact and the second relates to the nuisance elements such as overlooking and overshadowing. This is the main basis for objection from the owner of no. 4, a dormer bungalow with roof lights in its eastern slope and situated to the west of the site.

Visual

8.4.2. At present the subject house to be demolished is two storeys in height. (Its roof height is 6.668m - 11.84m OD.) The ground floor presently abuts the boundaries but is stepped back at the upper level ground level by about 2.5m from no.4 to the west. The current juxtaposition is such that the roof apex of the house at no.4 extends deeper than the existing first floor level of the house proposed to be demolished whereas now it is proposed to construct along the boundary wall to marginally beyond the rear building line of no.4 to a height of 10.53mOD (lower than the existing ridge). This is an almost 3m increase in height than exists at the boundary. The additional two storeys are proposed at parapet height 13.68mOD at about 1.2m from the boundary (and 1.3m from the new rear wall beneath) and at the top level at 16.15m OD (set back about 2.5m from the boundary and almost 3m from the upper ground rear wall as revised in drawings submitted to the Board). The west elevation is modelled to incorporate a variety of layers and textures by way of materials and recesses and will considerably break down the massing. The relationship with the existing neighbouring houses is such that the views will be obscured by the house at

no.4 and the near views of the overall height will also be obscured by the recessed top floor. I consider this aspect to be within acceptable limits.

- 8.4.3. The proposal also incorporates a glazed screen along the boundary and a pergola with integrated canopy over the patio – the floor of which is comparable to the top of the rear boundary wall and this will be quite prominent as viewed from the neighbouring properties. I consider this element has the potential to be the most overbearing and visually intrusive however this aspect could be addressed by condition.
- 8.4.4. The elevation to the east is a simple rendered wall to a height of 13.68m OD and while this is quite vast and potentially bleak by itself, in the context of intended expansion along the boundary in no.6 (and as outlined in the appellant's drawings) it is, I consider, reasonable. I would emphasise however that this does not constitute any judgment on the principle of redevelopment of no.6 as that case would have to be assessed on its own merits.

Overlooking

- 8.4.5. With the respect to overlooking there are three elements that warrant detailed appraisal, and these relate to the patio, the upper ground floor rear windows and the 2nd floor terrace.
- 8.4.6. The patio is proposed with a floor level of 7.18mOD and an opaque screen is proposed along each side. I consider this should be a solid wall unless with the agreement of the neighbour.
- 8.4.7. The second aspect relates to the upper ground floor window which relate to the kitchen living space and which will be a busy living area – the floor to ceiling glazing extends close to the boundary at an elevated level and it is proposed to erect a glazed screen at the boundary . I consider this screen would be visually obtrusive and unwarranted given the alternative for narrowing the window opening. And solidifying the patio screen. The planning authority considered an increased set back to allow for planting however I consider the alteration to the patio screen and window would be sufficient.
- 8.4.8. The third source of potential overlooking arises in respect of the top floor terrace. My reading of the drawings and description is that the top floor balcony is to the front overlooking the sea and this is screened by well recessed opaque glazing to the

sides. Given its location to the front, the potential for overlooking towards private space is limited. It is also in an exposed setting at the top of the house and likely to be limited in its usage. The roof to the rear is proposed to be greened with sedum and there is no screen proposed. The use of the roof in the top level as a terrace is not specifically proposed and this should be clarified in condition. The set back as increased in the revised drawings also inhibits overlooking from this level.

Overshadowing

- 8.4.9. With respect to overshadowing the appellant has submitted shadow drawings illustrating the pattern of shadow at 9 am., noon and 4pm on days of Spring Equinox and summer solstice. There is some increase in shading at 9m to the rear of no.4, but the impact is otherwise negligible in terms of loss of sunlight and daylight. Due to the orientation the shadow however will increase to the rear of no.6 to the east from late afternoon. The owners however have no objection as it is intended to alter their property.
- 8.4.10. On balance, I do not consider the proposed development would, subject to minor alterations by way of condition, be unduly intrusive or injurious to residential amenity of adjacent properties

8.5. **Other matters**

- 8.5.1. **Drainage:** The drainage division requires further information including details in relation to flood risk. I note that historic flooding is caused by pluvial/surface water ponding along Marine Parade and wave overtopping is an additional flood source. I also note that flood mitigation measures have been based on the FRA Guidelines in respect of minimum floor levels. In this case the proposed FFL of 4.4m has been placed at 1.42m above the 0.5% AEP tidal event (2.98mOD) and .62m above the 0.5% AEP Mid-Range Future Scenario and I note the conclusions of the consultant engineers' report and its statement that the FFL of 4.4mOD is sufficient and I consider this to be reasonable. Similarly, in respect of pluvial flooding I consider the freeboard of 400mm to be reasonable in the context of flood depths of around .3m and a road level of 3.7m. On balance, having regard to the nature of development - replacing a single dwelling and the content of the Flood Risk Assessment report and the Flood Risk Management Guidelines for Planning Authorities, perspective on

nature and scale of such redevelopment and measures to address flood mitigation I do not consider the development to contribute to any increase in flood risk. I am satisfied that the requirements of the Drainage Division can otherwise be addressed by condition.

Car parking and public footpath: The Transportation division seeks to address the issue of a party wall between numbers 5 and 6 which protrudes onto the public footpath. While this could be construed to be a separate issue I consider the overall frontage should be viewed as entity and that where it is within the applicant's legal ability all measures to integrate the boundary treatment with the public realm should be addressed within the scope of permission. In the event that this is restricted by external ownership such as that associated with no.6 this could be addressed in what would appear to be an imminent proposal. Finally, the issues in relation to vehicular entrance width and parking layout can be addressed by condition.

9.0 **Appropriate Assessment**

- 9.1.1. Having regard to the minor nature of the proposed development and the location of the site in a serviced urban area and the separation distance to the nearest European site, no Appropriate Assessment issues arise. Accordingly, the proposed development, individually or in combination with other plans or projects would not be likely to have a significant effect on any designated European Site and a Stage 2 Appropriate Assessment and submission of a NIS is not therefore required.

10.0 **Recommendation**

- 10.1. I recommend that planning permission for the proposed development be granted based on the following reasons and considerations, as set out below.

11.0 **Reasons and Considerations**

Having regard to the architectural design and massing of the proposed development and the pattern of development along the coastal frontage and the immediate hinterland, the provisions of the Dun Laoghaire Rathdown County Development Plan 2016-2022, it is considered that, subject to compliance with

the conditions set out below, the proposed development would integrate in a satisfactory manner with the existing built development in the area, would not detract from the character or setting of Marine Parade, would not seriously injure the residential amenity of adjacent properties and would be acceptable in terms flood risk and pedestrian safety. The proposed development would, therefore, be in accordance with the proper planning and sustainable development of the area

12.0 Conditions

1. The development shall be carried out and completed in accordance with the plans and particulars lodged with the application, as amended by further plans and particulars submitted to the An Bord Pleanála on the 21st day of May 2020, except as may otherwise be required in order to comply with the following conditions. Where such conditions require details to be agreed with the planning authority, the developer shall agree such details in writing with the planning authority prior to commencement of development and the development shall be carried out and completed in accordance with the agreed particulars.

Reason: In the interest of clarity.

2. The proposed development shall be modified as follows:
 - (a) The rear facing window at Upper ground level shall be narrowed to the width of the patio at the same level which shall be screened by a solid wall structure in lieu of the opaque screening on each side unless otherwise agreed with the neighbouring property owner.
 - (b) The Pergola at upper ground floor level to the rear and integrated canopy shall be omitted.
 - (c) The opaque boundary screen shall be reduced to 400mm in height above the boundary wall with no.4 Marine Parade.

Revised drawings showing compliance with these requirements shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.

Reason: In the interest of visual amenity.

3. The accessible roof terrace at second floor level as indicated in the submitted plans as revised shall be confined to the front of the property and no other part of the roof shall be actively used by the occupants of the dwelling as a terrace or private amenity space.

Reason: In the interest of clarity.

4. Details including samples of the materials, colours and textures of all the external finishes to the proposed building, including those as modified at condition number 2 (a) above, shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.

Reason: In the interest of visual amenity.

5. Water supply and drainage arrangements, including the attenuation and disposal of surface water, shall comply with the requirements of the planning authority for such works and services.

Reason: In the interest of Public Health.

6. The construction of the development shall be managed in accordance with a Construction Management Plan, which shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development. This plan shall provide details of intended construction practice for the development, including noise and dust management measures and off-site disposal of construction/demolition waste.

Reason: In the interest of traffic safety and to protect the amenities of the area.

7. Site development and building works shall be carried out only between the hours of 0800 to 1900 Mondays to Fridays inclusive, between 0800 to 1400 hours on Saturdays and not at all on Sundays and public holidays. Deviation from these times will only be allowed in exceptional circumstances where prior written approval has been received from the planning authority.

Reason: To protect the amenities of the area.

8. Notwithstanding the exempted development provisions of the Planning and Development Regulations, 2001 and any statutory provision replacing or amending them, no development falling within Class 1 or Class 3 of Schedule 2, Part 1 of those Regulations shall take place within the curtilage of the house, without a prior grant of planning permission.

Reason: In the interest of the amenities of the area.

9. Two no. car parking spaces shall be provided within the site. The layout of these spaces including the access and boundary treatment shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development. The submitted details shall also set out an integrated and where necessary a phased approach, to a setting back of the protruding wall(s) onto the footpath fronting the property.

Reason: In the interest of traffic safety, orderly development and to ensure that adequate off-street parking provision is available to serve the proposed development.

10. The developer shall pay to the planning authority a financial contribution in respect of public infrastructure and facilities benefiting development in the area of the planning authority that is provided or intended to be provided by or on behalf of the authority in accordance with the terms of the Development Contribution Scheme made under section 48 of the Planning and Development Act 2000, as amended. The contribution shall be paid prior to commencement of development or in such phased payments as the planning authority may facilitate and shall be subject to

any applicable indexation provisions of the Scheme at the time of payment. Details of the application of the terms of the Scheme shall be agreed between the planning authority and the developer or, in default of such agreement, the matter shall be referred to An Bord Pleanála to determine the proper application of the terms of the Scheme.

Reason: It is a requirement of the Planning and Development Act 2000, as amended, that a condition requiring a contribution in accordance with the Development Contribution Scheme made under section 48 of the Act be applied to the permission.

Suzanne Kehely
Senior Planning Inspector

16th November 2020