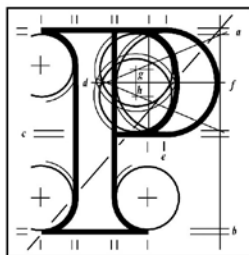


An Bord Pleanála



Inspector's Report

- Development:**
- (i) Change of use of part of the main building at lower ground floor level from residential use to embassy office use and the change of use of the remainder of the building from residential to embassy residential use.
 - (ii) Change of use of the existing mews building from residential to live/work use.
 - (iii) All associated and ancillary works, including internal amendments to the main building.
- All at 32 Burlington Road and 96 Waterloo Lane, Dublin 4.

Application

Planning authority:	Dublin City Council
Planning application reg. no.	2237/16
Applicant:	RGRE Embassy Ltd
Type of application:	Permission
Planning authority's decision:	Split decision

Appeal

Appellants:	Upper Leeson Street Area Residents Association RGRE Embassy Ltd
Type of appeals:	Third Party v Decision First party v Refusal part of split decision
Observers:	None
Date of site inspection:	18 th August 2016
Inspector:	Hugh D. Morrison

Site

The site is located towards the southern end of Burlington Road close to its junction with Leeson Street Upper. This site lies on the eastern side of this Road. To the north, lies a row of substantial, two storey over basement, semi-detached, period houses set within their own established grounds. Several of these houses are in non-residential use, including one that is in use as an embassy. On the opposite side of the Road, the grounds of the Double Tree Hotel maintain a roadside frontage and an adjoining site, with a long roadside frontage, is presently being redeveloped. Both sides of Burlington Road are lined by mature deciduous trees.

The site itself is of regular shape and it extends over an area of 0.12 hectares. This site accommodates a large detached house, which is composed of three storeys and which is of rectangular form with a feature semi-circular projection on the principal elevation under a circular roof. The front door to this house is at upper ground floor level on the northern elevation and is served by sets of external steps from either side. At the same level on the eastern elevation a conservatory is accompanied by a balcony. This house is served by garden areas to the north and east, including an enclosed walled garden further to the east. Vehicular accesses are from Burlington Road to the north and south of the house and they serve car parking areas. A separate pedestrian access connects to one of the aforementioned sets of external steps.

Towards the north eastern corner of the site lies a two storey over basement mews dwelling house, which is attached on its eastern side to a short row of mews dwelling houses. These dwelling houses are all accessed off a cul-de-sac that is itself accessed off Waterloo Lane, further to the east. The design and finishes of the mews dwelling house on the site complement that of the main house on this site. It is served by a gated car parking area that is separated from the grounds to this house by a wall.

Proposal

The proposal would entail the following elements:

- (i) Change of use of part (96.5 sq m) of the main building at lower ground floor level from residential use to embassy office use and the change of use of the remainder of the building (447.5 sq m) from residential to embassy residential use.
- (ii) Change of use of the existing mews building (146.9 sq m) from residential to live/work use.
- (iii) All associated and ancillary works, including internal amendments to the main building.

Planning authority's decision

Following receipt of further information, the planning authority made a split decision, i.e. items (i) and (iii) were permitted and item (ii) was refused on the following grounds:

The residential element of this proposed live work unit which is separate from and independent of the main dwelling on site does not comply with development plan standards for residential units by way of inadequate provision of private open space which is located to the front of the dwelling and is substantially less than the parent permission (2755/01). The development at 59 sq m does not meet minimum floor area for a two bedroom unit. The proposed development therefore contravenes Section 17.9.1 "residential quality standards" and Section 17.9.13 "live work units" of the 2011 Dublin City Development Plan and would thereby be contrary to the proper planning and sustainable development.

Technical reports

- Drainage: No objection, subject to condition.
- Roads and Traffic Planning: No objection, subject to conditions.

Grounds of appeal

Upper Leeson Street Area Residents Association (ULSARA)

The planning authority's refusal of item (ii) is supported.

The view is expressed that the embassy office use is an inappropriate use for a residential area and that it should be located in an office area.

The following grounds of appeal are cited:

- Injury to residential amenity by reason of level of business/office activity.
- Injury to residential amenity by reason of traffic movements and parking requirements together with related noise and disturbance.
- Injury to residential amenity by reason of enhanced security boundary treatments and provision of obtrusive lighting and cameras.
- Injury to visual amenity by reason of provision of flagpole(s) and extraneous signage.

The appellant observes that enforcement of planning conditions pertaining to embassies can be thwarted due to diplomatic immunity.

The appellant concludes that the proposal would be contrary to the amenities of Burlington Road, as a residential street, and that it would run contrary to the trend elsewhere in the city of offices/houses in multiple occupation being converted back into family homes.

Attention is drawn to the draft CDP, which excludes embassy office from the uses that are open for consideration.

RGRE Embassy Ltd

The applicant welcomes the planning authority's grant of permission to items (i) and (iii). They cite the following grounds of appeal against the refusal of item (ii):

- Attention is drawn to the Z2 reference to live work units to the effect that they will be considered where they would not detract from or alter the physical character and fabric of the streetscape. The current proposal would not entail any external alterations to the existing mews and the proposed live work unit would conform to the CDP's definition of the same.
- With respect to private open space, the proposed live work unit would be compliant with either inner city dwelling house or apartment standards, as the proposed provision would be 32.2 sq m, i.e. in excess of 5 – 8 sq m per x 4 bedspaces. This area comprises 22.9 sq m in front of the mews and a front balcony (1.8 sq m) and a rear terrace (7.5 sq m) (cf. drawing nos. FI1109 revision 01 and FI1110 revision 02).
- With respect to floor area, while the planning authority applies the CDP's Section 17.9.1 minimum standard of 80 sq m, Section 17.9.13, which addresses live work units, cites a minimum standard of 55 sq m for the residential portion of such units. (The reference in the latter Section to "comply with development standards for residential units" is understood to mean standards other than minimum floor area ones. If the Board does not agree with this understanding, then a condition is invited that would limit the unit to one bedroom). Attention is drawn to the work portion of the unit, which would extend over 67.8 sq m, and which would, in practise, be used "after hours" as part of the overall integrated live work unit.
- With respect to the planning authority's contention that the live work unit would not be in compliance with Section 17.9.13, each element of this Section is discussed in relation to the proposed unit and the conclusion is reached that it would be compliant.

Responses

The planning authority has no further comments to make.

The appellant's response to the applicant's case

Objection is raised to the proposed live work unit on the following grounds:

- Injury to residential amenity by reason of level of business/office activity.
- Injury to residential amenity by reason of traffic movements and parking requirements together with noise related disturbance.
- Further deterioration of quality of life for residents of Burlington Road in overall balance of development in Z2 zoned area.

The applicant's response to the appellant's case

The applicant responds to each of the appellant's original grounds of appeal as follows:

- The majority of the main building would be used for embassy residential. Only 18% of the floorspace would be used for embassy office. Thus, the latter would be subsidiary to the former and so it would have no demonstrable impacts upon residential amenity. Furthermore, the character of Burlington Road is already shaped by the presence of other embassies and the Double Tree Hotel.
- Traffic generated by the proposed embassy office use would be minimal and so noise and disturbance from the same would be negligible. While the existing 4 off-street parking spaces would be used in conjunction with the proposed embassy residential use, on-street parking is available and the location is well served by public transport.
- The envisaged security arrangements do not form part of the current application. If they were deemed to be necessary in the future, then they would be the subject of a further application. A condition could make such need explicit.
- The above response is relevant to the question of flagpoles and signage, too.
- The alleged breach of planning conditions by others is not a matter for the Board, as enforcement is a function of the planning authority. To prejudge the actions of any prospective occupier of the proposed embassy would be unfair.

- The appellant has not demonstrated that the small scale embassy office would be injurious to the residential amenities of the area.

Planning history

- 0759/97: Two storey over garden level private residence: Permitted at appeal (PL29S.102982).
- 2755/01: Two storey mews to the rear of No. 96 Leeson Street Upper: Permitted, subject to a condition that requires that the mews be used as a single dwelling unit only.

Development Plan

Under the Dublin City Development Plan 2011 – 2017 (CDP), the site is shown as lying within a Z2 residential neighbourhoods (conservation areas), wherein the zoning objective is “To protect and/or improve the amenities of residential conservation areas.”

Section 17.21 of the CDP addresses embassies and Appendix 29 sets out definitions of embassy, including embassy: residential and embassy: office.

Section 17.9.13 of the CDP addresses live work units and Appendix 29 sets out a definition of such units.

Embassy: residential and residential are permissible uses and embassy: office and live-work units are open for consideration.

Assessment

I have reviewed the proposal in the light of the CDP, relevant planning history, and the submissions of the parties. Accordingly, I consider that this application/appeal should be assessed under the following headings:

- (i) Land use,
- (ii) Traffic, access, and parking,
- (iii) Amenity,
- (iv) Development Plan standards, and
- (v) AA.

(i) Land use

- 1.1 The proposal would entail a change of use of both the main house and mews dwelling house on the site. The former change of use would be from that of a dwelling house to an embassy: office on part of the lower ground floor and an embassy: residential on the remainder of this floor and on the other floors. The latter change of use would be from a dwelling house to a live work unit.
- 1.2 Under the current CDP, the site is shown as lying within an area that is zoned Z2, residential neighbourhood (conservation area). Within Z2, the uses denoted as embassy: residential and live work unit are permissible, while the use denoted as embassy: office is open for consideration.
- 1.3 The appellant draws attention to the draft CDP for 2016 – 2022. Under this Plan, embassy: office has been removed from those uses listed under open for consideration. They also draw attention to a trend whereby this use is increasingly being located in office, as distinct from residential, areas. They state that the proposed change of use would run contrary to the further trend of houses reverting to residential use from commercial use. Objection is therefore raised to the proposed introduction of the embassy: office use to the house.
- 1.4 I note that the said Plan is still in draft form and so it would be premature to give weight to the same. I note, too, that the pattern of existing and permitted uses on Burlington Road is quite diverse and that this is reflected in the land use zonings, which distinguish the two sides of the Road. Thus, while the eastern side is zoned Z2, the western side is zoned Z1 (sustainable residential neighbourhoods) and Z6 (employment/enterprise). Within the Z2 zone, there are a number of non-residential uses, including an existing embassy.
- 1.5 The applicant has responded to the appellant by drawing attention to the relatively modest portion of the house that would be used as embassy: office, i.e. 96.5 sq m of 544 sq m or 18%. Thus, the main use of this house as embassy: residential would continue to be residential.
- 1.6 The CDP advises that open for consideration uses may be permitted where they would be compatible with the overall policies and objectives for the zone, would not have undesirable effects on permitted uses, and would otherwise be consistent with the proper planning and sustainable development of the area. This Plan states that, in considering other uses, the guiding principle is to enhance the architectural quality of the streetscape and the area. In this respect, the proposal would not entail any alterations to the exterior of the main house or to the mews dwelling house. (While the applicant does accept that additions to the site may be required in conjunction with any embassy: office use, e.g. a flag

pole, signage, and security arrangements, these would be the subject of a future application, which would reflect the requirements of a specific prospective user). I, therefore, consider that the proposed uses would have no streetscape impact. Their effect on neighbouring uses will be considered under the following two headings of my assessment.

1.7 The submitted plans include within the site the main house and the mews dwelling house. While the applicant made clear at the application stage that the future use of these two buildings is intended to be separate, their respective grounds have not been formally denoted. Furthermore, during my site visit, I observed that the boundary between the site and the dwelling house at No. 96 Leeson Street Upper is open and undefined “on the ground”. Clearly, the extent of embassy sites is a matter of importance for reasons that extend beyond planning and so I propose that this be signalled to the applicant by means of a note that reiterates Section 34(13) of the Planning and Development Act, 2000 – 2015.

1.8 I conclude that in land use terms the proposed uses denoted as embassy: residential and live work unit would be permissible and the proposed use denoted as embassy: office would be open for consideration. Thus, the former uses would be appropriate in principle, while the latter use requires to be the subject of further assessment before a conclusion can be reached on its appropriateness or otherwise.

(ii) Traffic, access, and parking

2.1 The appellant expresses concern over the traffic that the proposed embassy: office use would generate and the environmental impact of such traffic. The applicant has responded by stating that such traffic would be minimal and thus its environmental impact would not be appreciable.

2.2 The applicant draws attention to the equivalent of 4 off-street car parking spaces that accompany the existing house. These spaces would serve the proposed embassy: residential use. They also draw attention to the availability of on-street car parking spaces and the proximity of public transport links to the site.

2.3 I concur with the applicant’s assessment of likely traffic generation and its environmental impact. During my site visit, I observed that there are two vehicular accesses and one pedestrian access to the site off Burlington Road and that double yellow lines accompany the nearside kerb line. Elsewhere on this Road, on-street car parking spaces are available and bus and, to a lesser extent, Luas stops are conveniently placed for the site.

2.4 The site lies within Area 2 for the purposes of establishing car and cycle parking provision. Thus, the 4 spaces that would serve the embassy uses and the single space that would serve the live work use would represent a satisfactory level of provision. The embassy uses should also be served by 4 cycle stands.

2.5 I, therefore, conclude that the traffic likely to be generated by the proposed uses would be capable of being accommodated, either on or off-site, and that access and car parking arrangements would be satisfactory. Cycle parking arrangements should be conditioned.

(iii) Amenity

3.1 The proposal would entail effectively the diversification of the use of both buildings on the site. Thus, the main house would become an embassy: residential and an embassy: office and the mews dwelling house would become a live work unit. In both cases, residential use would persist.

3.2 The appellant expresses concern that the proposed embassy: office use would lead to greater activity on the site and thus in an intensification in its use, which would be seriously injurious to the residential amenities of the area. The applicant has responded by questioning how in particular amenity would be thus affected.

3.3 I note that the subject house on the site is detached and within its own grounds. I note, too, that its size and design would facilitate its ready conversion to the proposed embassy uses. Vehicular and pedestrian accesses would be directly off Burlington Road, to the west, and the embassy: office use would be located in the northern portion of the lower ground floor and entered/exited via the northern elevation of the house and thus away from the nearest off-site residential uses, which are to the east and south.

3.4 The CDP defines live work units as follows:

Live-work units are commercial units designed to accommodate a residential element, such as an apartment. Live-work units are used for business/enterprise to provide for the following uses, office, medical and related consultants, data processing, software development, media associated uses, publishing and film production, artists and crafts studios, home-based economic activity and creative industries.

As discussed above under the first heading to my assessment, live work units are a permissible use within Z2 and so they are deemed to be compatible with the amenities of residential areas.

3.5 I conclude that the proposed embassy and live work uses would be compatible with the amenities of the area.

(iv) Development Plan standards

- 4.1 The mews dwelling house on the site was designed as a mews dwelling house and its siting, in the north eastern portion of the site, means that it has a close relationship with the main house, to the south west, and the adjoining mews dwelling house to the east. The front elevation of this mews dwelling is accompanied to the north by an enclosed landscaped car parking area. Its exposed western side elevation abuts the grounds to the main house and so this elevation has no transparent glazed openings within it. The southern rear elevation abuts a small space above the basement, which includes a rooflight with a railing around it. This space is not enclosed and so its boundaries are open to the aforementioned grounds.
- 4.2 Following a request for further information from the planning authority, the applicant submitted a detailed breakdown of the floorspace that would be comprised in the proposed live work unit. Thus of the total floorspace of 127.4 sq m, the live component would extend over 59.6 sq m and the work element would extend over 67.8 sq m.
- 4.3 The planning authority has critiqued this proposed live work unit on the basis that the continuing two bedroom apartment element would have insufficient floorspace and the private open space available to serve this unit would be inadequate.
- 4.4 The applicant has responded by stating that, under Section 17.9.13 of the CDP, 55 sq m rather than 80 sq m is the minimum for a two-bed apartment, provided other development standards are complied with. However, if the Board is minded to interpret this Section differently, then a condition requiring that the live work unit be a one-bed unit is invited.
- 4.5 A comparison of the aforementioned Section of the CDP with that of Section 17.9.1, which addresses residential quality standards, indicates that they are reconcilable. Thus, the 55 sq m cited in the former Section is a minimum, while in the latter it is the minimum for a one-bed unit. As a two-bed unit should have a floorspace of at least 80 sq m, the proposed live work unit would be sub-standard as a two-bed one, but not as a one-bed one.
- 4.6 I note that, while live work units are meant to be integrated between their live and work elements, the current proposal would have no living room and so it would be wholly dependent upon the ground floor office space to provide a living

room. Such dependency would be excessive. However, if one of the bedrooms is re-specified as a living room, then this unsatisfactory duplication could be overcome. I note, too, that as the office would be in the southern portion of the ground floor and the office storage use would be in the basement, access to these spaces would be off the kitchen, which functions as a circulation space, too. This layout/configuration would be less than satisfactory in facilitating ease of attendance on the part of any one visiting the office.

- 4.7 The applicant has also responded to the question of private open space. They state that the relevant CDP standard of 5 – 8 sq m per bedspace would be capable of being achieved, as a total of 32.2 sq m would be available.
- 4.8 The private open space referred to by the applicant serves the existing mews dwelling house. However, the case planner's report draws attention to the fact that this space does not fully reflect that which was shown under permitted application reg. no. 2755/01. Thus, an area of 46 sq m with a consistent depth of 8m to the rear of the mews dwelling house has not materialised. At the application stage, the planning authority clarified with the applicant that the proposed live work unit would be entirely separate from and not dependent upon the main house. Accordingly, it would be appropriate for this unit to be served by dedicated private open space and, given the aforementioned shortfall, the quantity and quality of this space can reasonably be re-visited under this conversion, as distinct from new build, proposal.
- 4.9 The applicant identifies 4 spaces: the landscaped car parking space in front of the dwelling house, the small space beside the rear elevation that is continuous with the projection of the basement underneath, and a front and rear balcony at first floor level off each of the two bedrooms. I consider that the usability of the first and second of these spaces is questionable, as the first is primarily used as a car parking space and the second is dominated by a rooflight with railings around it. This latter space is unenclosed and so, as it is continuous with the grounds of the main house on the site, it affords no privacy. Furthermore, to enclose this space would accentuate its smallness. The third and fourth spaces are two shallow semi-circular balconies: the front northerly one overlooks the rear lane, while the rear southerly one overlooks the main house. Their size, orientation, and privacy levels limit their utility and amenity value.
- 4.10 In summary, I am concerned that the quality of the private open space identified by the applicant would be insufficient to ensure that it would afford a satisfactory standard of amenity for future residents.
- 4.11 Beyond the planning authority's reason for refusal, the applicant has addressed the considerations listed under Section 17.9.13 that are of relevance to live

work units. They conclude that their proposal would comply with these considerations. Nevertheless, I discuss certain of them below.

- 4.12 The third of these considerations refers to a generous floor to ceiling height on the ground floor and the evident presence of this floor within the streetscape. The applicant sets this consideration to one side on the basis that, as their proposal would entail conversion rather than new build, it is effectively not applicable. I am not persuaded that this consideration can be set aside so easily.
- 4.13 The fourth consideration refers to separate bin storage arrangements for the residential and commercial elements of the proposal. While the applicant refers to drawing no. F11110, this drawing does not show such separation or the satisfactory siting of bins. In practise, such arrangements would further prejudice the landscaped car parking space, as an identified area of private open space.
- 4.14 The fifth and sixth considerations refer to ventilation and noise insulation. While the applicant advises that Building Regulation requirements have been met, presumably such requirements have only been met insofar as the mews dwelling house was designed to be a single dwelling. The current proposal is for a live work unit, although the submitted plans refer to an office use. The above cited definition of a live work unit is wider than simply that of an office and so ventilation and noise insulation requirements should reflect this. In this respect, the fact that the mews dwelling house adjoins another one on its long eastern side means that these questions need to be addressed and answered in a demonstrably satisfactory way, if the amenities of this adjoining mews dwelling house are to be safeguarded. By the same token, the amenities of the adjacent main house on the site need to be safeguarded, too.
- 4.15 I conclude that the mews dwelling house would not be a suitable candidate for conversion to a live work unit as its siting, internal design and layout and poor quality private open space would militate against the provision of a satisfactory unit under Section 17.9.13. In particular, the amenity that would be afforded to the residential use and the functionality of the commercial use would be limited and the applicant has not demonstrated that the latter use would be capable of being conducted in manner that would be compatible with the residential amenities of the area. I, therefore, concur with the planning authority's split decision, whereby the proposed conversion of the mews dwelling house to a live work unit is omitted from any permission.

(v) AA

5.1 The site is not in or near a Natura 2000 site. The nearest such sites are in Dublin Bay (SAC and SPA). The proposal would be linked to these sites via the combined foul and surface water public sewerage network that discharges to the Ringsend WWTP. Periodic storm water surges through this Plant can lead to a decrease in the water quality of the Bay. However, the Conservation Objectives of the said Natura 2000 sites do not refer to water quality. Furthermore, the scale of water treatment occurring at the Plant is such that the contribution of the proposal would be negligible.

5.2 Having regard to the nature and scale of the proposed development and/or nature of the receiving environment and/or proximity of the nearest European site, no Appropriate Assessment issues arise and it is not considered that the proposed development would be likely to have a significant effect individually or in combination with other plans or projects on a European site.

Recommendation

In the light of my assessment, I recommend that the proposal be the subject of a split decision. Thus, items (i) and (iii) of the proposal should be permitted (1) and item (ii) refused (2).

(1) Reasons and considerations

It is considered that, subject to conditions, the proposed change of use of the house at 32 Burlington Road from a dwelling to an embassy: residential and an embassy: office would comply with the Z2 zoning objective for the site. This proposal would not entail alterations to the external appearance of the house and so the quality of the streetscape would be unaffected. Traffic and activity generated by the proposed uses would be compatible with the residential amenities of the area. No appropriate assessment issues would be raised. The proposal for the house at 32 Burlington Road would thus accord with the proper planning and sustainable development of the area.

Conditions

1. The development shall be carried out and completed in accordance with the plans and particulars lodged with the application, as amended by the further plans and particulars submitted on the 25th day of April 2016, 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 embassy: office use shall be restricted to that part of the ground floor denoted as being the subject of this use on the submitted plans.

Reason: In the interest of clarity.

3. The proposed development shall be amended as follows:

(a) Four cycle stands shall be provided.

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 order to promote cycling as a sustainable mode of transport.

4. 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 hours of working, noise management measures and off-site disposal of construction/demolition waste.

Reason: In the interests of public safety and residential amenity.

5. Site development and building works shall be carried out only between the hours of 08.00 to 19.00 Mondays to Fridays inclusive, between 08.00 to 14.00 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: In order to safeguard the residential amenities of property in the vicinity.

6. The developer shall pay to the planning authority a financial contribution of €3,380 (three thousand, three hundred and eighty euro) 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 – 2015. The contribution shall be paid prior to the 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. The application of any indexation required by this condition shall be agreed between the planning authority and the developer or, in default of such agreement, the matter shall be referred to the Board to determine.

Reason: It is a requirement of the Planning and Development Act, 2000 – 2015, 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.

Note

A person shall not be entitled solely by reason of a permission under Section 34 of the Planning and Development Act, 2000 – 2015, to carry out any development.

(2) Reasons and considerations

The proposed conversion of the mews dwelling house at 96 Waterloo Lane to a live work unit would, due to the siting and internal design and layout of this dwelling house, inherently contravene Section 17.9.13 of the Dublin City Development Plan 2011 – 2017, which sets out the characteristics of live work units. Furthermore, the applicant has failed to demonstrate that the dwelling house, which adjoins another mews dwelling house and is adjacent to the main house on the site, would be capable of being converted to a live work unit in a manner that would be compatible with the amenities of these residential properties, in terms of noise insulation and ventilation requirements. Likewise, the live element of the proposal, even if re-specified as a one bedroomed apartment, would be served by poor quality private open space that would fail to afford a satisfactory standard of amenity to future occupiers. The proposal for 96 Waterloo Lane would, therefore, be contrary to the proper planning and sustainable development of the area.

Hugh D. Morrison
Inspector
23rd August 2016