



An
Bord
Pleanála

Inspector's Report PL29S.249164

Development	Installation of external façade luminaries to ground and first floors of two protected structure houses
Location	19 and 20 Merrion Square, Dublin 2.
Planning Authority	Dublin City Council
Planning Authority Reg. Ref.	3127/17
Applicant(s)	Secretarial and Consultancy Services
Type of Application	Permission
Planning Authority Decision	Refuse Permission
Type of Appeal	First Party
Appellant(s)	Secretarial and Consultancy Services
Observer(s)	Royal Institute of Architects of Ireland
Date of Site Inspection	23 rd and 28 th of November 2017
Inspector	Angela Brereton

1.0 Site Location and Description

- 1.1. The site concerns 2no. terraced properties located on the northern side of Merrion Square North to the west of the junction with Hollies Street. Denzille Lane is at the rear. No.19 and 20 Merrion Square North are 4 storey over basement buildings, each with a 3 bay façade in the frontage facing south to the square. The buildings are both Protected Structure Georgian Houses and are located in a row of similar type properties facing Merrion Square.

2.0 Proposed Development

- 2.1. This is for the installation of external façade luminaires to the Ground and First Floors of two Protected Structure Georgian Houses located at nos. 19 and 20 Merrion Square North. The façade luminaires are proposed to vertically illuminate the historic granite and brickwork façade, between the existing sash windows.
- 2.2. The application form notes that the floor area of each commercial property is 484sq.m. The Site Layout Plan shows the uses on site, including the Denzille Lane Mews and Rear Extension to the buildings. No extension to existing floor area is proposed in this application. Drawings showing the front elevations have been submitted including the existing and the proposed.
- 2.3. A letter and a Conservation Report has been submitted by Scott Tallon Walker Architects regarding the Front Facades External Lighting Application.

3.0 Planning Authority Decision

3.1. Decision

On the 4th of August 2017, Dublin City Council refused permission for the proposed development for the following reason:

The proposed installation of façade luminaires to these protected structures would constitute an inappropriate non-essential intervention, which would have a detrimental impact on the visual amenity and character of the buildings and the wider setting of the square, and could set an undesirable precedent for similar such

developments. The proposal would thereby be contrary to Policy CHC2 of the DCDP 2016-2022 and to the proper planning and sustainable development of the area.

3.2. Planning Authority Reports

3.2.1. Planner's Report

The Planner had regard to the locational context of the site, planning history and policy and to the submissions made. They noted that the properties are P.S and the site is within the Z8 Georgian Conservation Area. Also, that Section 11.1.5.3 and Policy CHC2 of the DCDP 2016-2022 apply. They had reservations regarding the introduction of external lighting of this nature on these two buildings. They consider that the proposed introduction of night time illumination to the subject site would constitute piecemeal development and as such would have a detrimental visual impact on the streetscape. They provide that the proposal is contrary to the proper planning and sustainable development of the area and is contrary to zoning objective Z8 'to protect the existing architectural and civic design character' of the area.

3.3. Other Technical Reports

Internal

3.3.1. Conservation Officer

They recommended that permission be granted subject to recommended conditions.

3.3.2. Engineering Department Drainage Division

They have no objections subject to the development complying with drainage conditions.

External

3.3.3. Transport Infrastructure Ireland

They provide that they have no observations to make relative to the proposed development.

3.3.4. Dart Underground Office – Iarnód Éireann

They note that the overall proposed development site is within the zone of influence of the DART Underground, but that given the nature of the proposed development works, the integrity of DART Underground will not be compromised.

3.4. **Third Party Observations**

A submission has been received and concerns include the following:

- Such luminaries will damage the infrastructure of these historic building and should not be part of any such historic structures.
- They will seriously detract from the character of such important buildings.
- They query whether consideration has been given to the obtrusive appearance of structures during daytime.
- Taking into account the status of the P.S there are less obtrusive/damaging options should illumination be needed.

4.0 **Planning History**

- Reg.Ref.0304/16 – Split Decision by the Council relative to internal works to the P.S -19 & 20 Merrion Square, Dublin 2.

Exemption granted (subject to various clauses) for:

1. Removing and storing all artwork, furniture and floor finishes.
2. Lifting floorboards as necessary.
3. Stripping out all external wiring.
4. Conducting survey to identify any other essential works.
5. Rewiring to existing switches and sockets.
6. Replace floor boards and overlay with 3.2mm hardboard.

Exemption refused for:

1. Installing new risers and distribution boards to 19 & 20.

- Reg,Ref,1708/06 – Permission was approved for internal alterations within the existing offices comprising the creation of staff facilities at basement level, the enlargement of the door between the front and rear ground floor reception rooms; and associated minor alterations, renovations and refurbishment works at no.19 Merrion Square, which is a P.S.

5.0 Policy Context

5.1. Development Plan

Section 2.3.9 refers to the recognition and support for Conservation, Culture and Heritage as a core determinant of the city's character.

Section 4.5.9 refers to Urban Form and Architecture Policies SC26 and 26 refer.

Chapter refers to Culture and Heritage. Section 11.1.3 sets out the challenges to protect the character of designated ACAs and CAs and to protect the structures of special interest and review the RPS.

Policy CHC1: *To seek the preservation of the built heritage of the city that makes a positive contribution to the character, appearance and quality of local streetscapes and the sustainable development of the city.*

Section 11.1.5.1 refers to the RPS. The Planning and Development Act, 2000 (as amended) defines 'Protected Structures' as structures, or parts of structures, which form part of the architectural heritage and which are of special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest.

Policy CHC2 seeks to ensure that the special interest of protected structures is protected. Section 11.1.5.3 provides details of P.S. Policy Application.

Section 11.1.5.4 refers to ACAs and CAs in particular to the special interest or unique historic and architectural character and important contribution of heritage to the city. Policy CHC4 relates to enhancement opportunities and development restrictions in Conservation Areas. Policy CHC5 seeks to protect Protected Structures and Buildings in ACA's.

Chapter 14 sets out the Land-use Zoning Principles and Objectives. The subject site is located within the land use zone Z8 i.e Georgian Conservation Areas. Section

14.8.8 sets out the Land-use Zoning Objective which is: *To protect the existing architectural and civic design character, and to allow only for limited expansion consistent with the conservation objective.*

It is provided that the guiding principle is to enhance the architectural quality of the streetscape and the area, and to protect the Georgian character of the area.

Chapter 16 provides the Development Standards and refers to Design, Layout, Mix of Uses and Sustainable Design.

5.2. Architectural Heritage Protection Guidelines for Planning Authorities

These are of relevance and were issued by the DoEHLG in 2004/2011 –

Section 1.3.1 (f) provides: *Where a structure is protected, the protection includes the structure, its interior and the land within its curtilage and other structures within that curtilage (including their interiors) and all fixtures and features which form part of the interior or exterior of all these structures. All works which would materially affect the character of a protected structure, or a proposed protected structure, will require planning permission.*

Chapter 7 provides the Conservation Principles.

Section 7.7 promotes Minimum Intervention i.e. *The principle of promoting minimum intervention in a protected structure is best summed up by the maxim ‘do as much as necessary and as little as possible’. Dramatic interventions in a protected structure are rarely appropriate. The best work in conservation terms is often that which is low key, involves the least work and can be inexpensive.*

Chapter 8 refers to Walls and Other Structural Elements. Section 8.5.7 includes:

Careful consideration needs to be given to proposals to fix new items to the exterior of a protected structure. Permission should usually only be given for fixtures that respect the architectural design of the structure and do not detract from its appearance. Examples of types of fixtures which may be proposed could include floodlighting, entry phones, name plates or signboards, information plaques, alarm boxes, satellite dishes, window cleaning eyes, or plastic utility boxes such as gas and electricity meters.

Section 8.5.8 includes: *The applicant should be able to satisfy the planning authority that matters such as the location of fixtures, associated cable runs, light fittings and so on have been properly considered and would not detract from the appearance of the protected structure, the setting of other protected structures or the character of an ACA. Consideration should be given to the effect the methods of fixing proposed may have. Many fixing methods will cause damage by staining or fracturing the material into which they are fixed. The presence of a fixture which requires painting, cleaning or lubrication will usually result in splashing or staining of the adjacent building fabric. If the fixture is changed or removed, holes left may remain visible even after careful repair. Fixing should be carried out in a manner that minimises the visual impact upon the building and avoids physical damage to the fabric. Fixing into existing joints or holes may be acceptable.*

Chapter 13 deals specifically with the Curtilage and Its Attendant Grounds

Section 13.7.1 provides: *It is essential to understand the character of a site before development proposals can be considered. Section 13.7.2 has regard to the issues to be considered including: (a) Would the development affect the character of the protected structure? (b) Would the proposed works affect the relationship of the protected structure to its surroundings and attendant grounds?*

Section 18.6 includes having regard to the Introduction of New Elements relevant to a Protected Structure: *The planning authority should not seek to discourage contemporary and innovative designs, providing these are of sufficiently high quality and do not detract from the character of the historic fabric.*

6.0 The Appeal

6.1. Grounds of Appeal

A First Party Appeal has been submitted by Scott Tallon Walker Architects, on behalf of Secretarial and Consultancy Services. They provide details of their reasons for the luminaries. Their grounds of appeal include the following:

- The intention is that the existing architectural quality will be more appreciated by all year round, particularly in evenings during dark, winter months.

- They emphasise that the reason for the proposed works is not to showcase the recent refurbishment works. They will enhance the visual amenity and character of the two buildings and contribute to the wider setting of the overall terrace and the square.
- There is an ongoing process of sensitive renewal of buildings and upgrading of the park. They note that other buildings around Merrion Square have been permitted to and installed external lighting, eg. the Irish Architectural Archive (Appendix 2).
- As an architectural practice, they provide RIAI Grade 1 Conservation services and it is their professional duty to ensure that they achieve the key principles of the Charter for Architectural Conservation.
- The proposed development is part of an ongoing programme of continuous carefully considered maintenance, repair and upgrading of the buildings to meet modern standards and comply with building standards.
- In undertaking this programme of work they have consulted with the Council's Conservation Officer and her comments and recommendations have been included in every proposed change to the building. They ask that her memorandum be requested from DCC in considering this appeal.
- They provide that they have carefully considered this application and note that ARUP lighting division were lead designers for the technical selection of appropriate light fittings, ensuring that the proposal is in line with DCC guidance and limitations for light pollution. Further details and examples of this process can be found in Appendix 1.
- They note that there are no policies relevant to light fittings to P.S in the DCDDP and provide that Sections 8.5.7 and 8.5.8 of the Architectural Heritage Guidelines for Planning Authorities (2011) were fully considered. These refer to new items fixed to the exterior of the building including light fittings.
- They also refer to the Departmental Guidelines on floodlighting of buildings in paragraphs 13.5.5,13.5.6 and 13.5.7. They note that they have researched 'best practice' guidelines in other cities with similar architectural heritage.

- They provide details relevant to the guidelines for Alterations to Listed Buildings in Edinburgh and note they have sought to address these in their design process.
- They provide they have given careful consideration to the impact of the lighting proposed and consider that it fully complies with Policy CHC2 of the DCDP 2016-2022.

6.2. Planning Authority Response

- 6.2.1. Dublin City Council has no further comment to make and considers that the Planner's Report on file adequately deals with the proposal.

6.3. Observations

- 6.3.1. An Observation has been received from The Royal Institute of Architects of Ireland, in support for the proposed development. The RIAI occupies a similar Georgian property, No.8 Merrion Square North, not far from the subject property and has done since 1839. They include the following:
- The intention of the proposed development is to illuminate the property so that the existing architectural quality of the buildings which are P.S will be appreciated by the public particularly during the evenings and the dark winter months.
 - The RIAI consider that the proposals will improve the overall appearance of these buildings and facades in this historic streetscape.
 - They will contribute to and enhance the urban context including the overall setting of the building along this Georgian frontage of Merrion Square in a very subtle and sympathetic manner.
 - Extensive research has been carried out relative to the size and positioning of the illuminations prior to application stage and they consider that they will enhance the overall setting of the building.
 - All steps have been taken in relation to compliance with the AHPG and the specific advice set out in the Departmental Guidelines for floodlighting of buildings.

7.0 Assessment

7.1. Principle of Development and Planning Policy

- 7.1.1. Nos.19 and 20 Merrion Square North are located within the Land Use Zoning Z8 i.e Georgian Conservation Area. Section 14.8.8 of the DCDP 2016-2022 provides: *The aim is to protect the architectural character/design and overall setting of such areas. A range of uses is permitted in such zones, as the aim is to maintain and enhance these areas as active residential streets and squares during the day and at night-time.* The existing building is in primarily commercial (office) use, which is permissible in the Z8 Zoning Objective.
- 7.1.2. In this case the properties are also Protected Structures and part of a group of such fine Georgian period properties in the Merrion Square North area. It is of note that these are all included in the DCDP Record of Protected Structures. Policy CHC2 seeks: *To ensure that the special interest of protected structures is protected. Development will conserve and enhance Protected Structures and their curtilage.* This includes criteria (a) to (f) regarding works to a P.S. to ensure its protection and enhancement. It is noted that while the First Party consider that the proposal complies with this policy the Council's reason for refusal considered that the proposal would be contrary to this policy.
- 7.1.3. While not located in an ACA the site is located in a Conservation Area. Section 11.1.5.4 includes: *Designated Conservation Areas include extensive groupings of buildings or streetscapes and associated open spaces and include (parts of) the medieval/walled city, the Georgian Core (in recognition of Dublin's international importance as a Georgian city), the 19th and 20th century city and the city quays, rivers and canals.* Section 11.1.4 of the DCDP 2016-2022 provides the Strategic Approach to the city's built heritage. This includes that survey and review will be conducted outwards from the historic core and will focus on 10no. phase 1, priority areas. It is provided that the rationale for selection is that these are areas within the historic core that have high concentrations of protected structures but are presently sited outside designated Architectural Conservation Areas: This includes Merrion Square - including Government Buildings and Mount Street (Upper & Lower).

7.1.4. Regard is also had to the Architectural Heritage Protection Guidelines and to the relevant DCDP 2016-2022 policy and objectives as have been noted in the Policy Section above. Therefore, the importance of the buildings in the architectural context of the Merrion Square area in planning and conservation terms needs to be highlighted, in terms of the assessment of the current application. Regard is had to this and to the planning issues raised by the First Party and Observer in the Assessment below.

7.2. Regard to the History of the Site

7.2.1. A Conservation Report by Scott Tallon Walker Architects has been submitted with the application. This has regard to a number of documents concerning the history of the area and provides that the nos.19 & 20 Merrion Square North are eighteenth century buildings, built c.1764. This provides details of internal/external design features of note. They noted the current commercial uses of the buildings and that Scott Tallon Walker architects (founded 1928) have been in continuous use of no.19 Merrion Sq. since 1947. No.20 which was in multi-tenanted and mixed residential/office use when acquired in 1973 was fully occupied by Scott Tallon Walker around 1990. They have recently completed restoration works to both houses which focused mainly on a new electrical installation. As part of these works they endeavoured to restore where possible damaged fragments of the original fabric. They note the architectural merits of the more recently built (c.2006) 19/20/21 Denzille Lane mews development to the rear of the site and include a copy of the Site Plan. These properties while within the wider landholding as shown on the Site Layout Plan are not the subject of consideration in this appeal.

7.3. Justification for Proposed Development

7.3.1. The Conservation Report provides details of the scope of the works and notes that it is their objective to illuminate the historic fabric and architectural features of the two Georgian houses by way of installation of linear light fittings at ground and first floors between the window opening. The Impact and Justification Section notes that it is proposed to provide an extensive number of lights to illuminate the frontage of the building. While there will be some loss of original fabric materials it is provided that on completion that the façade will be intact and can be readily maintained. It is also

noted that the aesthetic impact to the existing façade may have a minor visual impact during daylight hours. The fittings have been designed to sit below the existing lead flashing and are to be the same colour as the lead flashing.

- 7.3.2. Photographs 1-8 have been submitted showing the external lighting mock-up to house no. 20 Merrion Square North as seen from across the street and provides details of the preferred luminaire options. It is provided that photographs 5 and 6 show the truest representation of the proposed condition. Photograph no. 8 indicates the relationship between the level of the proposed fittings and the existing lead flashing.
- 7.3.3. The First Party provide that their reasons for installing these luminaries are to improve the appearance of the buildings which are protected structures, in a way that complements and expresses their historic architectural quality. That these will contribute to and enhance the urban context including the overall setting of the buildings along the Georgian frontage and in relation to Merrion Square in a very subtle and sympathetic manner. The facades of nos.19 and 20 Merrion will be thus illuminated by night, creating a visual amenity along Merrion Square North.
- 7.3.4. Scott Tallon Walker Architects, provides RIAI Grade 1 Conservation services and they provide that it is their professional responsibility to ensure that any interventions respect and protect their architectural heritage. Also, that they have adhered to and implemented the key principles of the Charters for Architectural Conservation which include the following: minimal intervention: that all new works should be reversible: that all new works should be identifiable as such and should not claim to be historical: that all new works should be based on in-depth research and should not be based on conjecture: that is should never be the intension of the conservationist to try to return the building to one particular style or period-later alterations should be respected.
- 7.3.5. In considering this proposal, they provide they have paid careful attention to positioning, size, visibility and appearance of the light fittings in relation to the existing building; the detailing and fixing methods to be used to ensure that there would be no risk of damage to the fabric of the existing building; the light emission, colour and contrast in relation to the building, the overall frontages along Merrion Square, and within the overall context of the Square. They include technical details

from ARUP lighting division in Appendix 1. This includes a Fixing detail in Fig. 1 and a Mock up photograph in Fig. 2.

- 7.3.6. They note that there is little advice in relation to external lighting of buildings in conservation areas in the current DCDP. They consider that the shopfront guidelines are not relevant in this instance. They refer to the Architectural Heritage Guidelines to Planning Authorities and to paragraphs 8.5.7 and 8.5.8 (referred to in the Policy Section above) which refer to new items fixed to the exterior of the building including light fittings. They provide that these items were fully considered and also the Departmental Guidelines on floodlighting of buildings and they quote paragraphs 13.5.5, 13.5.6 and 13.5.7.
- 7.3.7. They provide that they have researched 'best practice' guidelines in other cities with similar architectural heritage. Of particular relevance are the guidelines for Alterations to Listed Buildings by The City of Edinburgh Council for their Georgian 'New Towns' area which is a UNESCO World Heritage Site and they quote from Section 3(a) of item 6.1.2 of these guidelines relative to the standard of external fittings to listed buildings. This includes reference to visually unobtrusive floodlighting. They note that they sought to address all the points in this guidance as part of their design process.
- 7.3.8. Also, they have given careful consideration to the pattern, colouring and intensity of lighting. Muted, natural tones are proposed to complement the existing building material and to give a gradation of light to minimise contrast between lit and unlit areas and to avoid an uncoordinated patchwork. Therefore, different lighting schemes could be coordinated and consider this should be sought in other instances around Merrion Square to maintain architectural coherence. In this regard they consider that they have fully complied with Policy CHC2 of the DCDP 2016-2022.
- 7.3.9. Regard is had to Policy CHC2 of the DCDP which seeks to conserve and enhance the special character of the P.S. This includes criteria (a) to (f) which relate to works to a P.S. Of particular note in this case is (a) which seeks to: *Protect or, where appropriate, restore form, features and fabric which contribute to the special interest;* and (d) which seeks: *Not cause harm to the curtilage of the structure; therefore, the design, form, scale, height, proportions, siting and materials of new development should relate to and complement the special character of the protected structure.*

Also to Section 11.1.5.3 which includes: *Interventions to Protected Structures should be to the minimum necessary and all new works will be expected to relate sensitively to the architectural detail, scale, proportions and design of the original structure. This should take into account the evolution of the structure and later phases of work, which may also contribute to its special interest.*

7.3.10. The issue in this case is that the proposed development is additional and not essential for the preservation or conservation of the Protected Structures. It does not seek to reinstate or retain additional fabric. Therefore, the question is would these new additions enhance the appearance of the P.S and the character of the streetscape. Regard is had to the Conservation Report submitted with the application, which provides details of the installation of the proposed lighting fixtures and fittings. It is noted that a considerable number of light fittings are proposed to be installed at ground and first floor levels i.e 6no. at ground floor and 7no at first floor. The issue in this case is would the proposed illuminations be seen to detract or enhance as a new and additional feature to the original buildings. The Submission made is of note relative to the possibility of a lesser scheme with reduced lighting fixtures and fittings i.e. the provision of alternative light units in the basement well, (which has been done at no.13 Merrion Square North) however, this is not the subject for consideration in the current application.

7.4. Impact on the Character and Amenities of the Area

7.4.1. It is noted that the Council's Conservation Officer did not object to the proposal subject to recommended conditions. They considered that the proposed locations of the fittings are sufficiently discreet and well-planned so as not to adversely impact on the overall façade/protected north terrace of Merrion Square. They also provided that as noted in the pre-planning discussions works to the masonry façade in areas of poor condition may arise and provision in the compliances has been made to allow local areas of repair to be undertaken subject to the approval of the CO.

7.4.2. It is noted that the RIAI have submitted an Observation in support of the application which considers that the proposals will improve the overall appearance of these buildings and facades which are protected structures, particularly along Merrion Square which is a fine example of Georgian Dublin. They also consider that they

would complement and express the urban historic and architectural quality of the buildings within the urban historic setting of Merrion Square.

- 7.4.3. Regard is also had to Policy CHC4 which relates to the Conservation Area i.e: *To protect the special interest and character of all Dublin's Conservation Areas, Development within or affecting a conservation area must contribute positively to its character and distinctiveness, and take opportunities to protect and enhance the character and appearance of the area and its setting.* Enhancement opportunities include replacement and re-instatement of original features. This also includes that development must not: *Harm buildings, spaces, original street patterns or other features which contribute positively to the special interest of the Conservation Area.*

7.5. **Regard to Precedent**

- 7.5.1. Having regard to precedent the First Party note that other buildings around Merrion Square have been permitted to and installed external lighting, e.g the Irish Architectural Archive (see Appendix 2) and that there is an ongoing process of sensitive renewal of buildings and upgrading of the park. A letter has been included from The Irish Architectural Archive (no. 45 Merrion Sq. East) which notes that floodlights have been installed at their building since 2004 when the building was renovated by the OPW. The letter submitted with the application by Scott Tallon Walker Architects concludes that they hope that this proposal may set a precedent for other Dublin City Georgian townhouse owners. They provide that they aim to set a precedent for other Dublin City Georgian Townhouse owners going forward. Therefore, while each case is considered on its merits the issue of precedent is of relevance in the consideration of this application. The issue is whether this is a desirable precedent.
- 7.5.2. If permitted it will allow for these two properties nos. 19 & 20 to be illuminated at night. Therefore, they will appear more visually dominant than the adjoining terraced properties on Merrion Square North. It must be noted that these properties are all P.S, built in the eighteenth century and it is arguable that the provision of such lighting and associated fittings on these properties would detract from the uniformity and character of the buildings in the streetscape. I noted on my daytime site visit that there appeared to be no other buildings with such external light fittings in this area of Merrion Square.

7.5.3. While it could also be argued that this proposal is relatively minor, its impact on the Protected Structures and the Georgian Conservation Area particularly in the darker evenings on the wider area will be considerable. I noted on my winter evening site visit, that none of the other properties on this side of Merrion Square have these luminaries. The existing building appeared already well lit internally as seen from the streetscape, while the majority of the buildings were not as well lit. The impact of street lights in the area, also needs to be factored in. It is considered that the visual impact of this proposal will be more intensive than envisaged in isolation. As such it would appear piecemeal and set an undesirable precedent for such luminaries as there would be a notable difference in the streetscape between those lit and unlit properties. This would be detrimental to the character of the Georgian Conservation Area.

7.6. **Appropriate Assessment**

7.6.1. Having regard to the nature and scale of the development in a fully serviced urban location, 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.

8.0 **Recommendation**

8.1. I recommend that this proposal be refused for the reasons and considerations below.

9.0 **Reasons and Considerations**

1. Having regard to location of the site within the Z8 Georgian Conservation Area the protected structure status of Nos.19 and 20 Merrion Square North, and the adjoining terrace and the pattern of development in the area, it is considered that the proposed works would, by virtue of the installation of these external façade luminaries to the Ground and First Floors of two Protected Structure Georgian Houses, lead to an inappropriate, non-essential form of intervention and a piecemeal form of development as seen in the wider area. They would set an undesirable precedent and have a detrimental visual impact on the character of these structures within the Georgian

Conservation Area and would therefore be contrary to Policies CHC2 and CHC4 of the Dublin City Development Plan 2016-2022. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.

Angela Brereton
Planning Inspector
30th of December 2017