

An
Bord
Pleanála

S. 6(7) of Planning and Development (Housing) and Residential Tenancies Act 2016

Inspector's Report on Recommended Opinion

ABP-300879-18

Strategic Housing Development

Demolition of structures including Former Baily Court Hotel and construction of 159 apartments in 3 blocks and one mews buildings with 188 car parking spaces, commercial/retail spaces including a crèche and community building and 2 retail units with vehicular access, public plazas and pedestrian links.

Location

Balscadden Road & Former Baily Court Hotel, Main Street, Howth, Co. Dublin

Planning Authority

Fingal County Council

Prospective Applicant

Crekav Trading GP Limited

Date of Consultation Meeting

20th March 2018

Date of Site Inspection

26th February 2018

Inspector

Una Crosse

1.0 Introduction

Having regard to the consultation that has taken place in relation to the proposed development and also having regard to the submissions from the planning authority, the purpose of this report is to form a recommended opinion as to whether the documentation submitted with the consultation request under section 5(5) of the Planning and Development (Housing) and Residential Tenancies Act 2016 - (i) constitutes a reasonable basis for an application under section 4, or (ii) requires further consideration and amendment in order to constitute a reasonable basis for an application under section 4.

2.0 Site Location and Description

The site has an area of 1.55 hectares and is located to the west of the Balscadden Road, east of Main Street/Abbey Street and south of the Martello Tower which is a protected structure/national monument. The proposed application site is the accumulation of three land parcels. The former Baily Court Hotel is located on Main Street and comprises a three storey structure set back from the street. To the east/northeast of the Baily site there is an area of ground referred to as the Cluxton lands which are located to the north of Asgard Park, a mature development of residential properties and west of the Balscadden Road. The largest element of the accumulated site is the northern element which accommodates the Edros building and which is adjoined to the north by the Martello Tower which is elevated above the northern area of subject site. A public pathway runs along the north and north eastern boundaries of the site facilitating access from the path to the Martello Tower to the Balscadden Road.

The site changes considerably in level. The northern area of the site is at a lower level falling from the Martello Tower mound having been quarried historically and now accommodating the derelict Edros building and accompanying grounds. The lands to the south rise significantly with an embankment adjoining the Balscadden Road. The land rises by c. 15 metres from north to south. While the site addresses Main Street, part of it is to the rear of properties along Abbey Street which is further north of Main Street. The Balscadden Road includes is one way to traffic travelling away from the Harbour. Balscadden Bay is located to the east of Balscadden Road.

3.0 Proposed Strategic Housing Development

Permission is sought for a development which proposes the following:

- Demotion of existing structures on site including the former Baily Court Hotel (c.2051 sq.m) and the disused sports building (c.604 sq.m);
- Three apartment blocks and one news building which include 159 apartments with the following mix:
 - 39 one-bed units (c.24.5%)
 - 93 two-bed units (c.58.5%)
 - 27 three-bed units (c.18%)
- 188 car parking spaces of which 111 are within the basement of Block C, 57 within basement of Block 57 and 20 on-street spaces.
- Commercial/retail space (c.976 sq.m) including a crèche (170 sq.m) within Block C to accommodate 38 children, community room, 2 retail units and a café.
- Two vehicular entrances, the main entrance from Main Street with an access proposed from the Balscadden Road to the podium parking serving Block B;
- New Street between Main St. and Balscadden Road with two new public plazas and a pedestrian link from Abbey Street to Balscadden Road.
- Ancillary site development works and services including a sub-station.
- New surface water network to connect to the existing surface water drainage on Main Street with upgrades required to c.450m of existing main along Balglass Road and Main St.

4.0 Planning History

There is an extensive planning history on the subject lands which is detailed in section 3 of the Planning Report accompanying the planning application. The subject site is a combination of 3 elements for the purposes of the previous planning history which is outlined in Figure 3 in the planning report. The three parts comprise (A) the site of the former Baily Court Hotel to the southwest of the application site, (B) the site referred to as Cluxton to the south of the site and Site (C) Balscadden to the north. I will summarise as follows:

Site A - site of the former Baily Court Hotel

Ref. F15A/0072- Amendments to permission below increasing number of units from 7 to 8.

Ref. F13A/0110 (ABP-PL06F.242595)- Demolish the former hotel and construct 4-storey structure including 7 apartments.

Site B – Cluxton

Ref. F15A/0545 (ABP-PL06F.246183) – Permission refused for 9 three-storey dwellings and entrance onto Balscadden Road. There was one reason for refusal which is summarised as follows:

- *Design, height and scale, contravenes specific Objective 528 of the Fingal County Development Plan 2011-2017 which seeks to ensure the layout, scale, height and design of developments respect the high amenity status of the surrounding area, the Martello Tower and the village character.*
- *Design, including form and materials, would be visually incongruous at this prominent and highly sensitive location in Howth within the Howth Special Amenity Area buffer zone and adjacent to the Architectural Conservation Area for the historic core of Howth. The proposed development would adversely affect an Architectural Conservation Area.*

Ref. F06A/1897(ABP-PL06F.224372) – Permission granted for 6 detached houses and new vehicular entrance from Balscadden Road. Permission extended under Ref. F06A/1897/E1.

Site C – Balscadden

Ref. F14A/0108 – Permission granted for demolition of disused sports hall and construction of 23 residential units and commercial kiosk unit with upgrade works to the existing vehicular access onto Balscadden Road and a pedestrian link from Abbey Street to Balscadden Road.

Ref. F07A/1349 (ABP-PL06F.227972) – Permission refused for demolition of disused sports hall and construction of 64 residential units and cafe unit of 303 sq.m with upgrade works to the Balscadden Road and a pedestrian link from Abbey Street to Balscadden Road and access to Martello Tower.

Reasons for refusal related to open space zoning of the lands, high amenity area within SAAO and ACA and impact on the Balscadden Road.

5.0 National and Local Planning Policy

Section 28 Ministerial Guidelines

Having considered the nature of the proposal, the receiving environment, the documentation on file, including the submissions from the planning authority, I am of the opinion that the directly relevant S.28 Ministerial Guidelines are:

- Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas' (including the associated 'Urban Design Manual')
- Design Manual for Urban Roads and Streets'
- Sustainable Urban Housing: Design Standards for New Apartments (2018)
- Childcare Facilities – Guidelines for Planning Authorities
- Architectural Heritage Protection – Guidelines for Planning Authorities.
- The Planning System and Flood Risk Management (including associated Technical Appendices).

National Planning Framework

Chapter 4 of the Framework addresses the topic of 'making stronger urban places and sets out a range of objectives which it is considered will assist in achieving same. National Policy Objective 13 provides that in urban areas, planning and related standards, including in particular building height and car parking, will be based on performance criteria that seek to achieve well-designed high quality outcomes in order to achieve targeted growth. These standards will be subject to a range of tolerance that enables alternative solutions to be proposed to achieve stated outcomes, provided public safety is not compromised and the environment is suitably protected.

Statutory Plan for the area

The relevant statutory plan for the area is the Fingal County Development Plan 2017-2023 and there are a number of zoning objectives on the site as follows:

- Objective RS – Residential – part of the southern area of the site is zoned residential, the objective of which is to provide for residential development and protect and improve residential amenity.
- Objective TC – Town and District Centre – the majority of the site is zoned TC, the objective of which is to protect and enhance the special physical and social character of town and district centres and provide and/or improve urban facilities.
- Objective HA - High Amenity – a small linear area of ground to the north of the south adjoining the boundary with the Martello Tower is zoned HA, the objective of which is to protect and enhance high amenity areas.

Specific Objective - the site includes Specific Objective 115 which requires that any development – *'Ensure the layout, scale, height and design respects the high amenity status of the surrounding area, the Martello Tower and the village character'*.

Specific Objective 110 to the northeast of the site *seeks to 'provide access to Balcadden Beach from the start of the East Pier'*.

The Martello Tower is a protected structure (RPS:570) and the Tower and Motte are a recorded monument.

There is a map based objective 'to preserve views' along the northern boundary of the site and along the Balcadden Road.

Howth is defined as a 'Consolidation Area within a Gateway' in the Fingal settlement strategy. The approach to such areas is to seek to gain maximum benefit from existing transport, social and community infrastructure through the continued consolidation of the city and its suburbs. It is proposed to utilise opportunities to achieve higher densities where appropriate.

Part of the site, principally along western boundary of the site facing Main Street and Abbey Street and along the northern boundary of the site addressing the Motte/Martello Tower, is within the Boundary of the Howth Village Architectural Conservation Area.

The Howth SAAO buffer zone covers part of the site with the western boundary of the SAAO along Balscadden Road and the lands to the north and east of the road including the Motte site within the SAAO.

The following comprise a number of objectives and policies of relevance:

Dwelling Mix – Objective PM38 – achieve an appropriate dwelling mix, size, type, tenure in all new residential developments.

Density - Objective PM41 - *Encourage increased densities at appropriate locations whilst ensuring that the quality of place, residential accommodation and amenities for either existing or future residents are not compromised.*

Infill Sites - Objective PM44 - *Encourage and promote the development of underutilised infill, corner and backland sites in existing residential areas subject to the character of the area and environment being protected.*

Design – Objective PM45 – *Promote the use of contemporary and innovative design solutions subject to the design respecting the character and architectural heritage of the area.*

Public Open Space - Policy DMS57 *requires a minimum public open space provision of 2.5 hectares per 1,000 population. DMS57A requires that open space should be 10% minimum of the total site area.*

Open Space – Objective PM53 – *require an equivalent financial contribution in lieu of open space provision in smaller developments where the open space generated by the development would be so small as not to be viable.*

6.0 Forming of the Opinion

Pursuant to section 6(7) of the Act of 2016, regard is had in the forming of the opinion to the documentation submitted by the prospective applicant; the planning authority submission and the discussions which took place during the tripartite consultation meeting. I shall provide a brief detail on each of these elements hereunder.

6.1 Documentation Submitted

The prospective applicant has submitted information pursuant to section 5(5)(a) of the Planning & Development (Housing) and Residential Tenancies Act 2016 and Article 285 of the Planning and Development (Strategic Housing Development) Regulations 2017. This information included, inter alia, a Completed Application Form, Cover Letter, Planning Report, Statement of Consistency, EIAR screening report, Part V validation letter, cover letter and estimate of costs, A3 booklet of Architectural, engineering and Landscape Architecture Drawings, Architectural Drawings, Housing Quality Assessment and Schedule of Areas, Photomontages and CGI's, Engineering Drawings, Environmental Services Report, Traffic Impact Assessment including DMURS statement of compliance, Geo-technical Report, Sewer Tunnel Impact Assessment, Landscape Drawings, Landscape Design Statement, Landscape and Visual Impact Assessment, Access Report, Preliminary Fire Safety Note, Sustainability/Energy Report, Daylight and Sunlight Report, Archaeological Impact Assessment, Archaeological Testing Report, AA Screening Report, Ecological Impact Assessment Report, Tree Survey Report, Conservation Assessment Report, Operational Waste Management Plan.

Section 5(5)(b) of the Act of 2016 requires the submission of a statement that, in the prospective applicant's opinion, the proposal is consistent with both the relevant objectives of the development plan or local area plan concerned, and the relevant guidelines issued by the Minister under section 28 of the Act of 2000. These statements have been submitted, as required. The applicant's case is summarised as follows:

- The development of 159 no. residential units is well-designed in consultation with Fingal County Council and complies with the objectives and policies of the Fingal County Development Plan and National Policies.
- Proposal provides an appropriate form of high quality residential development for a substantial town centre/residential site providing an efficient use of land accessible to and well served by public transport.
- Irish Water are satisfied that there is capacity in the system for the proposed development and it is feasible to connect to it.

- Irish Water are facilitating building over its trunk sewer which lies 12m below the basement level of the scheme and are in discussions with the applicant regarding the upgrades required to the watermain on Balglass Road and Main Street.
- The proposed development represents a high-quality scheme in a town centre location proximate to public transport with minimal impact on adjoining properties.
- The development has seen a major redesign and reiterations in order to address the items raised in pre-planning meetings as well as from the planning history.
- The scheme provides for an appropriate and efficient residential density, a safe vehicular access arrangement, high quality open spaces, and a well-designed scheme with respects the existing village and is an appropriate scale along Balcadden Road which is the pedestrian route to the Howth SAAO.

6.2 Planning Authority Submission

A submission was received by An Bord Pleanála on the 5th of March 2018 from Fingal County Council. The 'opinion' of the planning authority included, inter alia, the following:

- The submission outlines the planning history and planning policy pertaining on the site.
- An examination is provided of the proposal in the context of the General Design Guidelines in Section 5 of the Howth Urban Centre Strategy;
- Insufficient cross sections proposed to assess impact on views from Martello Tower to Church Steeple;
- Photomontage from Abbey Street into proposed western space required with concerns expressed regarding penthouse levels proximate to the western space which is main interface with village core;
- Concerns regarding visual impact of proposal with potential lack of interaction with existing character of the village at interface with existing character of the village at interface with new western open space;
- Proposed uses are compatible with zonings and represent an appropriate level of commercial and community uses with density appropriate;

- Greater detail required on materials proposed for the blocks;
- Visual impact of proposal on village and piers, Martello Tower, SAAO, views from Balscadden Road and the Conservation Area outlined with Specific Objective 115 remaining on site despite change of zoning;
- Views of the land from the wider area and from Martello Tower and Abbey Street significantly negatively affected detracting from quality of landscape/view with redesign recommended allowing for greater use of roofscape to achieve graduated slope away from Martello Tower to the south retaining a 3-4 storey design approach;
- Concerns regarding proximity of proposed to the mound with shrub planting to green roof questioned with preference for greater setback from mound or omission of northern section of second floor with omission of a floor of units in north-western corner of Block C in addition to penthouse level;
- Proposal particularly visible from the mound associated with the Martello Tower, Abbey Street and Graveyard of the Abbey with additional photomontages required as per Conservation Officers report requested;
- Propose omission of penthouse levels of Block C and B and setback of northern elevation of Block C to be 2-storeys proximate to Martello Tower and Abbey Street proximate to pedestrian entrance to the Martello Tower (20 units);
- Conservation officers ongoing concerns outlined in relation to scale, use of plot widths and design of Block A on Main Street with concern regarding lack of replication of scale of existing structure with concern remaining regarding design with significant roof slope at northern part of Block stepping down to the south appearing to contradict the prevailing street form in the area with image from Abbey Street looking southwards along street required with redesign of northern part of Block A recommended;
- Plans not at an identified scale;
- Value of north facing ground floor private amenity spaces in Block B and C given proximity of new street/pedestrian path and amenity area of crèche, relocate ground floor bike store internally and space to north of bike store redesigned;
- Shadowing casting models are requested as part of daylight/sunlight document;

- Insufficient cross sections proposed to assess impact on amenity of properties on Abbey Street;
- Impact of proposal both visually and in amenity terms on Balscadden Road and adjoining houses by Block B a concern with concerns regarding appropriateness of five floors in this location base on Objective 115 with omission of penthouse level on western and northern elevation of Block B and review of eastern penthouse level pending submission of additional cross sections;
- Proposal will increase connectivity from the village to the Balscadden Road but considered more appropriate to continue paving out to meet the carriageway with Main Street and reduce any turning radii in this location;
- Noted report from Transportation Section recommends additional 57 car parking spaces but considered an appropriate location to restrict parking provision with an excess of secure bicycle parking spaces appropriate;
- Parking spaces on the street should not be assigned and should be public;
- Transport Section recommend TIA take Sutton Cross into account;
- Details of materials and construction details of public open spaces can be agreed by condition;
- Works to Balscadden Road to allow for a footpath along eastern side of carriageway to be widened to 1.8m to be undertaken by applicant;
- Parks Section state levies on 0.55ha of Class 1 and 0.18ha of Class 2 open space and contribution accepted in place of a playground;
- Concern raised in terms of maintenance of the sheet boundary treatment given coastal location along with interaction of SuDS and proposed pine planting;
- Ground floor buildings along new street to have 3m floor to ceiling height to facilitate conversion to non-residential uses;
- Water Services Section raise concern regarding surface water discharge rate of 8.1l/s which appears excessive and 3.2l/s also included in report;
- Archaeological concerns regarding impact of proposal on the mound having regarding to excavations into the mound from slippage/shifting of material;

- Implementation of site specific measures outlined on page 38 of screening report to be integrated into Construction Management Plan for the site;
- Management of any community space/room to be vested in local community;

6.3 Response from Department of Culture, Heritage and the Gaeltacht

In response to a request from the Board under Section 6(10) of the Planning and Development (Housing) and Residential Tenancies Act 2016 the National Monuments Service responded stating that the note the inclusion of two archaeological reports and on the basis of same recommend a condition is attached recommending pre-development testing on the site.

6.4 Consultation Meeting

A Section 5 Consultation meeting took place at the offices of An Bord Pleanála on the 20th March 2018, commencing at 2.30 PM. Representatives of the prospective applicant, the planning authority and An Bord Pleanála were in attendance. An agenda was issued by An Bord Pleanála prior to the meeting.

The main topics raised for discussion at the tripartite meeting were based on the Agenda that issued in advance and contained the following issues:

1. Design and layout including streetscape and plaza
 2. Visual Impact and Conservation Matters
 3. Geotechnical Investigation
 4. Archaeology
 5. Parking and Access Arrangements
 6. Surface Water and SuDS
 7. Any other matters
- In relation to design and layout including streetscape and plazas An Bord Pleanála sought further elaboration/discussion/consideration of the following: the rationale for the inclusion of a vehicular roadway through the site culminating in a turning head at the eastern boundary adjoining the Balscadden Road; the design and articulation of Block A particularly the gable feature at the western end of the

Main Street elevation and the potential impact of same on the ACA, and the calculation of public open space.

- In relation to Visual Impact and Conservation Matters An Bord Pleanála sought further elaboration/discussion/consideration of the following: the visual impact of the northern element of Block C on the Martello Tower and Motte, the visual and residential impact on the western elements of Block C on the amenity of properties along Abbey Street and the visual impact of Block B on the Balscadden Road and the materials proposed for buildings and surfaces. Conservation Matters considered related primarily to the impact of the proposal on the Martello Tower.
- In relation to Geotechnical Investigation An Bord Pleanála sought further elaboration/discussion/consideration of the following: the level of investigation undertaken at both the northern and southern boundaries of the site and the proposals for same including vibration monitoring and ongoing monitoring of the site.
- In relation to Archaeology An Bord Pleanála sought further elaboration/discussion/consideration of the following: the comments from the National Monuments Service of the Department of the Culture, Heritage and the Gaeltacht in relation to pre-testing and the archaeological investigations undertaken to date and proposed on site.
- In relation to Parking and Access Arrangements An Bord Pleanála sought further elaboration/discussion/consideration of the following: the level of parking proposed on site, improvements to the Balscadden Road footpath, delineation of the proposed Balscadden Road access to Block B, the inclusion of Sutton Cross in the Traffic Impact Assessment and the requirement for turning for the crèche.
- In relation to Surface Water and SuDS An Bord Pleanála sought further elaboration/discussion/consideration of the following: on the proposed discharge rate and the SuDS measures proposed on site.
- In relation to any other matters An Bord Pleanála sought further elaboration/discussion/consideration of the following: AA screening.

Both the prospective applicant and the planning authority were given an opportunity to comment and respond to the issues raised by the representatives of ABP. Those comments and responses are recorded in the 'Record of Meeting 300879' which is on file. I have fully considered the responses and comments of the prospective applicant and planning authority in preparing the Recommended Opinion hereunder.

7.0 Conclusion and Recommendation

Based on the entirety of the information before me, it would appear that the proposed development falls within the definition of Strategic Housing Development, as set out in section 3 of the Planning and Development (Housing) and Residential Tenancies Act 2016.

I have examined all of the information and submissions before me including the documentation submitted by the prospective applicant, the submissions of the planning authority and the discussions which took place at the tripartite meeting. I have had regard to both national policy, via the s.28 Ministerial Guidelines, and local policy, via the statutory plan for the area.

Having regard to all of the above, I recommend that further consideration and/or possible amendment of the documents submitted are required at application stage in respect of the following elements: internal access road and car parking details of which are set out in the Recommended Opinion below.

Having regard to the above, I recommend that the Board serve a notice on the prospective applicant, pursuant to Section 6(7)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016, stating that it is of the opinion that the documentation submitted with the consultation request under section 5(5) of the Act requires further consideration and amendment in order to constitute a reasonable basis for an application under section 4 of the Planning and Development (Housing) and Residential Tenancies Act 2016.

I would also recommend that the prospective applicant be notified, pursuant to article 285(5)(b) of the 2017 Regulations, that specified information (as outlined hereunder) be submitted with any application for permission that may follow. I believe the specified information will assist the Board at application stage in its decision making

process. I am also recommending that a number of prescribed bodies (as listed hereunder) be notified by the prospective applicant of the making of the application.

8.0 Recommended Opinion

An Bord Pleanála refers to your request pursuant to section 5 of the Planning and Development (Housing) and Residential Tenancies Act 2016. Section 6(7)(a) of the Act provides that the Board shall form an opinion as to whether the documents submitted with the consultation request (i) constitute a reasonable basis for an application under section 4 of the Act, or (ii) require further consideration and amendment in order to constitute a reasonable basis for an application under section 4.

Following consideration of the issues raised during the consultation process, and having regard to the opinion of the planning authority, An Bord Pleanála is of the opinion that the documentation submitted requires further consideration and amendment to constitute a reasonable basis for an application for strategic housing development to An Bord Pleanála.

In the opinion of An Bord Pleanála, the following issues need to be addressed in the documents submitted to which section 5(5) of the Act of 2016 relates that could result in them constituting a reasonable basis for an application for strategic housing development:

Internal Access Road

1. Further consideration of the documents as they relate to the hierarchy and configuration of the proposed internal spine road and turning area with specific reference to the Design Manual for Urban Roads and Streets and to the potential to create a pedestrian zone linking Main Street and the Balscadden Road and the proposed public plazas within the site. Further consideration of these issues may require an amendment to the documents and/or design proposals submitted.

Car Parking

2. Further consideration of the documents as they relate to car parking on the site. This further consideration should have regard to Chapter 4 of the Sustainable Urban Housing: Design Standards for New Apartments (2018) and to the National

Planning Framework and in particular National Policy Objective 13. This should include a detailed analysis of car parking demand particularly in the context of the proximity of the site to the Dart and Dublin Bus Services, the nature of the non-residential uses proposed on site, and the provision on the site of measures to support car sharing. Further consideration of these issues may require an amendment to the documents and/or design proposals submitted.

Pursuant to article 285(5)(b) of the Planning and Development (Strategic Housing Development) Regulations 2017, the prospective applicant is hereby notified that, in addition to the requirements as specified in articles 297 and 298 of the Planning and Development (Strategic Housing Development) Regulations 2017, the following specific information should be submitted with any application for permission:


1. Additional photomontage images from the Balcadden Road and from Abbey Street and a series of drawings, specifically cross sections at appropriate intervals showing the proposed development and the relationship with existing dwellings adjacent the site to the west. Drawings should be appropriately scaled. Site sections should be clearly labelled and located on a layout 'key' plan.
2. Detailed rationale for the design approach of both Block A and the height and design of the northern element of Block C as it relates to the Martello Tower the western element as it relates to Abbey Street.
3. Details of all materials proposed for the proposed buildings, open spaces, paved areas, boundary and retaining walls.
4. Cross sections of all SuDS features proposed on site in the context of surface water management on the site.
5. A full and complete drawing that details all boundary treatments.
6. A plan of the proposed open space within the site clearly delineating public, semi-private and private spaces.
7. The inclusion of Sutton Cross in the Traffic Impact Assessment.
8. A phasing plan for the proposed development.
9. A site layout that details areas to be taken in charge by the local authority.

Pursuant to article 285(5)(a) of the Planning and Development (Strategic Housing Development) Regulations 2017, the prospective applicant is informed that the following authorities should be notified in the event of the making of an application arising from this notification in accordance with section 8(1)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016:

1. National Transport Authority
2. Minister for Culture, Heritage and the Gaeltacht (archaeology and architectural heritage and nature conservation)
3. Heritage Council (archaeology and architectural heritage and nature conservation)
4. An Taisce — the National Trust for Ireland (archaeology and architectural heritage and nature conservation)
5. Irish Water
6. Fingal County Childcare Committee

PLEASE NOTE:

Under section 6(9) of the Planning and Development (Housing) and Residential Tenancies Act 2016, neither the holding of a consultation under section 6, nor the forming of an opinion under that section, shall prejudice the performance by the Board, or the planning authority or authorities in whose area the proposed strategic housing development would be situated, of any other of their respective functions under the Planning and Development Acts 2000 to 2016 or any other enactment and cannot be relied upon in the formal planning process or in legal proceedings.



Una Crosse

Senior Planning Inspector

9th
April 2018

