



An
Bord
Pleanála

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

Inspector's Report on Recommended Opinion

ABP-305195-19

Strategic Housing Development	350 no. unit residential development comprising a mixture of houses and apartments, (185 houses and 165 apartments), a two-storey childcare facility, community space and ground floor commercial unit.
Location	Lands south of Old Dublin Road and west of Rosshill Road, Co. Galway.
Planning Authority	Galway City Council.
Prospective Applicant	Kegata Limited.
Date of Consultation Meeting	27 September 2019.
Date of Site Inspection	13 September 2019.

Inspector

Stephen Rhys Thomas.

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 is located in the eastern suburbs of Galway City, immediately south of the Galway to Dublin railway line, the Old Dublin Road and Rosshill Road to the east. The site is large and divided by field boundaries and tree lines, remnants of the former par three golf course. The wider area is characterised by woodland, grazing farmland and detached houses set in large gardens. The overall site has two distinct characters, a large raised plateau more or less level with Rosshill Road but above the Old Dublin Road and a large depression or bowl at the western side of the site. The western and northern portions of the site are dominated by trees and woodlands. A small and unused farmyard complex with stone ruins is located more or less in the centre of the site, much overgrown with vegetation. There is a significant of level change at the centre of the site and at the boundary with the railway to the north. A folly set within an octagonal walled enclosure is located to the south of the site and is a protected structure and recorded monument.

3.0 Proposed Strategic Housing Development

The proposed development which is subject of this pre-application consultation request comprises 350 residential units (185 houses and 165 apartments), 2-4 storeys in height, as follows:

- 43 four bed houses – 12.5%
- 136 three bed houses – 39%

- 6 two bed houses – 1.5%
 - 42 one bedroom apartments - 12%
 - 123 two bedroom apartments – 35%
- Childcare Facility, 399 sqm.
 - Commercial/Retail, 237 sqm.
 - Community/hub/gym, 164 sqm
 - Office, 61 sqm
 - 604 car parking spaces and 768 bicycle spaces
 - The site area is 9.86 hectare. Residential density 36 units per hectare.

4.0 National and Local 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:

- ‘Urban Development and Building Heights Guidelines for Planning Authorities’ - 2018
- ‘Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities’ - 2018
- ‘Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas’ (including the associated ‘Urban Design Manual’)
- ‘Design Manual for Urban Roads and Streets’
- ‘The Planning System and Flood Risk Management’ (including the associated ‘Technical Appendices’)
- ‘Childcare Facilities – Guidelines for Planning Authorities’
- ‘Architectural Heritage Protection - Guidelines for Planning Authorities’ 2011

Other relevant national guidelines include:

- 'Framework and Principles for the Protection of the Archaeological Heritage'
Department of Arts, Heritage, Gaeltacht and the Islands 1999.

Local Policy

Galway City Development Plan 2017-2023

The site is subject to zoning objective LDR: To provide for low-density residential development, which will ensure the protection of existing residential amenity and a small portion on the western margins are zoned G: To provide for the development of agriculture and protect areas of visual importance and/or areas of high amenity.

There is a specific development objective for these LDR lands shown in Fig. 11.13 LDR Roscam Pitch and Putt and adjacent lands of the CDP and stipulates that:

- The maximum plot ratio density of 0.2:1 shall only be considered following agreement on an overall layout of the area.
- This layout will have regard to the sylvan character of the site and where appropriate the protection of existing trees and the Roscam Folly.
- Development will only be considered where it accords with strategic main drainage proposals.

Policy 2.9 Low Density Residential Areas of the CDP states that it is the policy of the Council to protect the character of these areas by ensuring new development has regard to the prevailing pattern, form and density of these areas and to protect the characteristics of these areas through development standards and guidelines.

In addition, the following sections of the development plan area relevant: Chapter 2 Housing and Sustainable Neighbourhoods, Chapter 3 Transportation, Chapter 4. Natural Heritage, Recreation and Amenity, Chapter 8. Built Heritage and Urban Design, Chapter 9. Environment and Infrastructure and Chapter 11. Land Use Zoning Objectives and Development Standards and Guidelines.

There is an objective to provide a Greenway in the area and a portion of it passes through the south western corner of the site.

A folly structure is located to the south of the site, it is recorded on the RPS with the reference number – 8803 (Roscam Folly) and is also a recorded monument.

5.0 Planning History

Subject site:

05/352 – Permission refused for the construction of a 137 unit residential development consisting of 16 no. 4-bed detached houses, 15 no. 5-bed detached houses, 26 no. 2-bed townhouses, 73 no. 3-bed townhouses, 7 no. 4-bed townhouses, a crèche (215 sq. m.) a shop (215 sq. m.), a new access to Old Dublin Road and all associated external and site development works. Permission was refused by GCC for five reasons, as follows:

- 1. The proposed development will be in conflict with the policies and objectives of the Galway City Development Plan relative to the LDR zoning and Outer Suburbs neighbourhoods. In particular in that it does not achieve 'a balance between the reasonable protection of the residential amenities of outer suburbs and the protection of the established character and the need to provide for sustainable residential development' and in that it does not have sufficient regard to the prevailing pattern, form and density of the existing area.*
- 2. The proposed development by virtue of layout, housing design, house types, private open space provision and lack of regard to existing landscape characteristics would result in a substandard unacceptable development.*
- 3. The proposed development, would result in a traffic hazard owing to insufficient sight lines at the junction of the access road with the Old Dublin Road.*
- 4. The drainage arrangements consisting of pumping and an associated rising main have been deemed inappropriate in the context of the overall planning and development of the area as they are not part of a strategic drainage resolution which would service this development and other future developments in Roscam.*
- 5. The proposed development has failed to achieve specific development objectives for this site as indicated in Figure 11.11 of the City Development Plan, in particular with regard to traffic, drainage and the protection of the sylvan character of the area.*

06/816 - the construction of (i) a 99 unit residential development (18,871 sqm) consisting of 43 no. 5-bed detached houses, 16 no. 4-bed detached houses, 25 no.

2-bed apartments, 2 no. 3-bed apartments, 12 no. 2-bed duplexes, 1 no. 3-bed end terrace house, (ii) a crèche (350 sqm), (iii) a new access to the Rosshill Road, (iv) an upgraded junction onto the Old Dublin Road, (v) ESB Substation, (vi) Pumping house, (vii) Car parking (225 no. spaces at surface level and 60 no. spaces underground) and (viii) all associated external and site development works.

Section 247 Consultation(s) with Planning Authority

It is stated by the prospective applicants in the submitted documentation that Section 247 pre-application consultations took place with the planning authority on the 8 May 2019. Details of the meeting are submitted.

6.0 Forming of an 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 submissions and the discussions which took place during the tripartite consultation meeting. I shall provide a brief detail on each of these elements hereunder.

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.

The information submitted included the following: a Completed Application Form; site layout plans and architectural and engineering drawings, an NIS and AA screening report, EIA Scoping Report, planning report and statement of consistency, Ecological Impact Assessment and scoping report, engineering services planning report, flood risk assessment, TIA, Archaeology Assessment, Site Lighting Report, Architectural Design Statement Report, Irish Water pre-connection enquiry, Part V plans and costs, Landscaping Layout, design statement, tree survey and schedule.

I have reviewed and considered all of the above mentioned documents and drawings.

Planning Authority Submission

In compliance with section 6(4)(b) of the 2016 Act the planning authority for the area in which the proposed development is located, Galway City Council, submitted a note of their section 247 consultations with the prospective applicant and also submitted their opinion in relation to the proposal. These were received by An Bord Pleanála on 12 September 2019.

The planning authority's 'opinion' included the following matters: planning history; zoning, policy to do with low density residential locations, plot ratio, density, residential amenity, landscape/play areas passive supervision, service and transportation infrastructure.

The planning authority's comments can be summarised as follows:

Principle of development – a plot ratio of 0.37:1 represents a material contravention of the CDP. The residential density proposed is in excess of the CDP target density of 35 uph for Residential zoned land, this site is zoned LDR where lower densities are envisaged. Road and footpath infrastructure is deficient in the area. Once the RSES for the region is completed, the CDP will be reviewed, until that time the Plan is the blueprint for the area. The proposed development cannot therefore be supported as it represents a significant material contravention of the CDP.

Urban Design and Layout – there is a dominant use of cul-de-sac arrangements, most houses gable onto to the main access street, open space is fragmented, unusable in many cases and peripheral, passive supervision of open spaces is poor and the topography of the site has not been satisfactorily explained. The siting and location of apartment blocks is not well considered and the creche facility fails to engage with its surroundings. All of these factors have not taken into consideration guidance provided by DMURS and the Urban Design principles of the CDP.

The **Transport Section** of the Council have the following concerns:

- The scale of the development is premature at this location given lack of pedestrian, cycling and public transport infrastructure in the area.
- The development does not encourage sustainable transport options and will result in high levels of commuting by car causing further traffic congestion in the area.

- There is clarification required regarding the proposed realignment of Rosshill Stud Farm Road and its relationship with the existing road alignment.
- The proposed cycle parking facilities have not been given due consideration during the design process.
- There is concern that the traffic analysis, particularly in relation to the Doughiska Rd / Dublin Road junction, is inadequate and doesn't reflect the current or expected situation in the area.

The planning authority conclude that as the necessary transport infrastructure is not in place, higher residential densities are not appropriate.

Other departments of the Council raise issues with detailed surface water design and their interaction with public paths and open space, the proposal fails to retain any kind of sylvan setting and play areas for all age groups have not been identified. There are also concerns over the ecological impacts to the area that would arise from the development as proposed.

Submission from Irish Water (IW)

A submission was received from Irish Water and is available on file. In summary, the submission states that the proposal requires pump station upgrades and water network extension to facilitate the scale of development. Capital works are required to Merlin Park number 1 wastewater pump station are required, the project is on the IW Capital Investment Plan and scheduled for completion in 2024. The project is at initial design stage and the scope of works, third party or statutory consents is not yet known. Water supply is dependent on the completion of a 200mm supply north of the site and part of a private development due for completion end of 2019.

The Consultation Meeting

A section 5 Consultation meeting took place at the offices of Galway City Council on the 27 September 2019, commencing at 11.30am. 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. Residential Density – local policy provisions and core strategy
2. Sustainable Transport – public transport, cycling and walking
3. Urban Design and Layout – setting, topography and hierarchy of open space
4. Natural and cultural heritage
5. Pump Station Upgrades (Merlin Park No. 1) – timeframe and IW engagement
6. Any other matters

In relation to **Residential Density – local policy provisions and core strategy**, ABP representatives sought further elaboration/discussion on the overall rationale for the proposed density at this location in the context of the Development Plan objective for low density residential development. Comments were sought from the planning authority in relation to their core strategy and the upcoming Regional Spatial and Economic Strategy (RSES). The planning authority stated that the LDR zoning at this site, whilst higher than existing density in the immediate vicinity, is envisaged to be much less than 35 units per Hectare. In addition, the planning authority stated that there is capacity in the core strategy to achieve growth in accordance with the Draft RSES with the current zonings already in place. The RSES target is 35 units per hectare across residential zonings. The proposed plot ratio and density are both material contraventions of the development plan. The applicant stated that there is no material contravention of zoning, but there is a material contravention of the plot ratio, that is an objective of the plan. ABP representatives reminded the applicant to prepare a robust rationale for the proposed development and clearly explain if the proposed density and plot ratio are material contraventions.

In relation to **Sustainable Transport – public transport, cycling and walking**, ABP representatives sought further elaboration/discussion on a possible future train

station on the site, adjacent to the railway. Have Irish Rail been approached and are there any future plans for railway stations in the Galway Area? The applicant was asked to explain what forms of sustainable transport will be available to future residents, given the number of car parking spaces proposed and the lack of good pedestrian and cycle facilities. The planning authority stated that there are no plans for a future rail station at this location, there are no bus services adjacent to the site but there are footpaths and a good bus service on the Dublin Road. The applicant has not engaged with Irish Rail with regard to a future train station. However, there are pedestrian facilities in the area and good bus services to the north of the site. The applicant was advised that it would be good practice to ensure future proofing on this proposed development in relation to the Old Dublin Road interface. A report should show sustainable transport alternatives, such as walking, cycling and public transport. The report should include an assessment of city bound traffic as well as other commuting patterns that might originate from this site.

In relation to **Urban Design and Layout – setting, topography and hierarchy of open space**, ABP representatives sought further elaboration/discussion on the overall urban design strategy for the site, in the context of the existing site features, the value of retaining on site features, such as the farm building ruins and a reassessment of the topography of the site. The documentation did not fully address the unique qualities of the site in terms of landscape features such as trees and topography. More information is required in relation to the design of apartments and gable end houses, elevation treatments and opportunities for overlooking should be explored. The planning authority noted that there is a lot of uniformity on the site and no legibility in terms of the definition of spaces and placemaking, on site features have not been maximised. The applicant explained the design rationale in terms of tree retention where possible, the design attempts to provide quality open space and a hierarchy of spaces.

In relation to **Natural and cultural heritage**, ABP representatives sought further elaboration/discussion on the location of the site in the context of nearby SAC and SPA sites, the submission of an NIS and comments made by the NPWS were noted.

Elaboration on the topic of the farm ruins was requested and the importance of placemaking by retaining on site features was discussed. The applicant noted that further analysis work was necessary in relation to the farm ruins on the site but suggested that its retention may not be feasible or accord with conservation principles.

In relation to **Pump Station Upgrades (Merlin Park No. 1) – timeframe and IW engagement**, ABP representatives sought further elaboration/discussion on the proposed upgrades in relation to the foul surface water network in the area and what third party consents or statutory consents would be necessary. The planning authority provided a good level of information on services in the area in the context of the Ardaun Local Area Plan. The planning authority stated that in terms of third party consents, land swaps may be required and planning permission may have to be sought. The applicant stated that they have been in contact with Irish Water and it seems that a phased delivery of housing may be workable. An Bord Pleanála representatives suggested that the applicant liaise with IW and outline the nature of proposed upgrades and detail whether third party or statutory consents are required. Any infrastructure works requiring planning permission could mean that an application could be considered premature pending the delivery of infrastructure.

In relation to the **other matters**, ABP representatives reminded the applicant of the requirements concerning the submission of an EIAR with any planning application.

Both the prospective applicant and the planning authority were given an opportunity comment and respond to the issues raised by the representatives of ABP. Those comments and responses are recorded in the 'Record of Meeting 305195' 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 applicants, 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 section 28 Ministerial Guidelines and local policy via the statutory plans for the area.

Having regard to all of 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:

1. Design and Layout

Further consideration/justification of the documents as they relate to the layout of the proposed development, in particular the documentation should demonstrate a thorough appreciation and assessment of the overall site context as the starting point in designing a distinct place. In this regard the applicant is required to revisit the 12 criteria set out in the 'Urban Design Manual' which accompanies the 'Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas' (May 2009) and the 'Design Manual for Urban Roads and Streets' (March 2013).

Particular attention should be paid to on site features of value or merit, topography and significant tree stands. Justification for, or amendments to, the layout of the apartment blocks proposed throughout the application site. The layout and relationship of these blocks relative to one another, the site topography and relative to the open spaces should be fully justified and/or reconsidered. The nature and functionality of the intervening space created between all apartment buildings, parking areas and streets should also be fully considered and justified.

Consequently, matters such as the arrangement and hierarchy of streets; configuration of the layout; connectivity with adjoining lands; provision of quality and usable open space and the creation of character areas within a high-quality scheme should be given further consideration. The further consideration of these issues may require an amendment to the documents and/or design proposals submitted.

2. Open space

Further consideration/amendment of the documents as they relate to the provision of high quality, safe and usable public open space. Particular attention is drawn to the size and location of open spaces in terms of topography and existing site features, and rationale for same, the potential for passive supervision of open spaces and play areas, the design of the streets, associated on-street parking and the creation of building edges/street frontages that reflect a clearly defined street hierarchy within the scheme, the location and design of bin and secure bicycle storage also requires greater consideration. The application of the principles of the Design Manual for Urban Roads and Streets and the advice provided by the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas' (including the associated 'Urban Design Manual') is advised. Further consideration of these issues may require amendment to the documents and/or design proposals submitted.

3. Car Parking

Further consideration/amendment of the documents as they relate to the provision and design of car parking within the proposed development. The documentation submitted at application stage should provide a robust rationale for the amount of car parking that is proposed. This should have due regard to the pattern of demand for travel that is likely to arise from the occupation of the proposed development, as well as to the likely demand from households to have access to private transport even where it does not provide the primary mode for travel to work or school. The documentation should also take proper account of the advice concerning car parking and cycle parking provided for in the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities – 2018 and the design and layout of car parking outlined in the Design Manual for Urban Roads and Streets.

4. Connectivity and Public Transport

Further consideration/justification of the documents as they relate to existing and proposed pedestrian and cycle facilities connecting the development with the Dublin

Road (R921) to the north, illustration of existing transport services such as rail and bus and future connections to adjoining residentially zoned land to the south of the site. The applicant should consider the preparation of a robust and achievable mobility management plan for the site that highlights the availability of existing and planned sustainable modes of transport such as walking, cycling and public transport. The further consideration of these issues may require an amendment to the documents and/or design rationale submitted.

5. Public Road Interface

Further consideration of the documents as they relate to the layout of the proposed development particularly the relationship to the Old Dublin Road and Rosshill Road. The documents should clearly show acceptable design solutions that tackle differences in level between the site and public road without the need for incongruous and heavy engineering solutions. Layout, contiguous elevations and section drawings should detail the relationship between the buildings and the public realm, existing and proposed. In particular, drawings should show the full suite of facilities that would be expected in any urban context; such as but not limited to; footpaths, landscaped margins, appropriate boundary treatments and the provision of passive supervision of these new public spaces. Any development that integrates with the public realm either existing or modified should accord with the best practice principles of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (including the associated 'Urban Design Manual') and the Design Manual for Urban Roads and Streets, that seek to provide better and safe pedestrian and cyclist environments. Further consideration of these issues may require amendment to the documents and/or design proposals submitted.

6. Water Services

Further consideration of documents as they relate to the water supply network, the foul sewer network and required pumping station upgrades to the Merlin Park number 1 wastewater pump station. An outline of the necessary works to address the constraints and what party or parties will be responsible for such works. In addition, there should be clarity as to whether such works would be the subject of a

separate consent process and or compulsory purchase process. Timelines for the delivery of any works is required relative to the delivery of the proposed development. Given the existing deficiencies in the provision of adequate sewerage infrastructure, the applicant should satisfy themselves that the proposed development would not be premature pending the delivery of required infrastructural improvements. 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. A layout drawing at an appropriate scale that details permitted development in the vicinity and specifically any road and footpath improvements, if any, and how they will integrate with the development as proposed. Specific reference should be made to the configuration and alignment of the local road network to the immediate east of the subject site along the Rosshill Road up to the point of a new junction with the Old Dublin Road.
2. A site layout plan clearly indicating what areas are to be taken in charge by the Local Authority. Streets should be shown up to the boundaries of the site and facilitate future access.
3. Details, including photographic samples, of the materials, colours and textures of all the external finishes to the proposed buildings, having regard to the need for low maintenance/high quality finishes that take account of the climatic characteristics of the area. A building lifecycle report for apartment buildings in accordance with section 6.13 of the 2018 Apartment Design Guidelines is also required.

4. Landscaping proposals including an overall landscaping masterplan for the development site and a site layout plan indicating the full extent of tree retention and removal if proposed. Details of proposed tree protection measures during construction. Details pertaining to the quantity, type and location of all proposed hard and soft landscaping including details of play equipment, street furniture including public lighting and boundary treatments should be submitted. Sections should be submitted at key locations where the public open spaces interface with proposed residential units.
5. A construction and demolition waste management plan.

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. Irish Water
2. Minister for Culture, Heritage and the Gaeltacht
3. Heritage Council
4. An Taisce
5. Transport Infrastructure Ireland
6. Iarnród Éireann - Railway Operator
7. Commission for Railway Regulation
8. The Galway County and City 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.

Stephen Rhys Thomas
Senior Planning Inspector

11 October 2019