



An
Bord
Pleanála

Inspector's Addendum Report ABP-306996-20

Development	Importation of inert excavation spoil comprising natural materials of clay, silt, sand, gravel or stone for the purposes of restoration of a previously extracted area (QY1)
Location	Moyfin, Longwood, Co Meath.
Planning Authority	Meath County Council
Planning Authority Reg. Ref.	TA181090
Applicant(s)	Davin Plant Hire Ltd.
Type of Application	Permission
Planning Authority Decision	Grant permission
Type of Appeal	Third Party
Appellant(s)	Eco Advocacy CLG.
Observer(s)	Peter Sweetman and Associates
Date of Site Inspection (for Addendum report)	10 th August 2020
Inspector	Patricia Calleary

Contents

1.0 Introduction	3
2.0 Proposed Development	3
3.0 Submissions received	3
3.1. Max Mooney & Co. Solicitors (for the applicant)	3
3.2. Planning Authority	5
3.3. Eco Advocacy (Appellant)	5
4.0 Assessment	6
4.1. Introduction	6
4.2. Planning Assessment	7
4.3. Environmental Impact Assessment	8
4.4. Appropriate Assessment	9
5.0 Conclusion and Recommendation	10

1.0 Introduction

- 1.1. This is an addendum report relating to an appeal case which follows a High Court Order dated the 5th day of March 2020. The Board decision on appeal file reference no. ABP-303182-18 has been quashed by the Courts and the file has been remitted back to the Board for a fresh determination. A new file with a reference: ABP-306996-20 has been assigned.
- 1.2. Following a notice under section 131 of the Planning and Development Act 2000, as amended, (hereinafter referred to as 'the Act'), two parties, Davin Plant Hire Ltd. (applicant) and Eco Advocacy CLG (third party appellant) responded. This addendum report considers the submissions received and includes an assessment of the new information as relevant.
- 1.3. This addendum report should be read in conjunction with the original inspector's report on file, Ref: ABP-303182-18 dated the 23rd day of April, 2019.

2.0 Proposed Development

- 2.1. The proposed development would consist of the importation of inert excavation spoil comprising natural materials of clay, silt, sand, gravel and/or stone for the purposes of restoration of a previously extracted area to result in agricultural and ecological after use. A Construction and Demolition (C&D) waste recovery activity would also be undertaken in the northern section of the site.
- 2.2. Further details and material volumes are set out in the original inspector's report (Ref: ABP-303182-18).

3.0 Submissions received

- 3.1. **Max Mooney & Co. Solicitors (for the applicant)**
 - 3.1.1. This submission sets out the planning history of the site, provides a summary of the current proposal and provides an outline of the Board's decision. Reference is made to appeal case: PL27.249167 which relates to an application granted on appeal by the Board for the restoration of a quarry site in Wicklow. In addition, the following is set out:

- The quarry is exhausted, and the applicant did not intend the carrying out any further quarrying works on the site;
- The applicant's predecessor in title was granted planning permission by Meath County Council for development to restore the former sand pit (TA150244) using material on site and the permission (dated 13th August 2015) remains lawful.
- The permission granted authorises the landscaping of the site and its return to agricultural use. The applicant was advised, however, that in order to carry out a proper restoration of the site, it would be preferable to import material onto the site.
- The previous decision of the Board did not disagree with the inspector's assessment, but rather, in noting case law, recorded a legal impediment to the granting of planning permission.
- In relation to the current site, An Bord Pleanála directed the then quarry owner (Roadstone Wood Ltd.) to apply for substitute consent (QV17.QV0013). Quarrying on the site had ceased at the time of this Section 261A determination and the owner chose not to pursue a substitute consent application for further quarrying.
- Refers to a legal opinion submitted by the appellant, in which it is submitted that substitute consent under Section 37L of the Act 'shall only be made for further development of a quarry as a quarry' and states that the proposed development is not a continuation of quarrying activity.
- States that there is no distinction to be drawn between the current appeal and a similar development in Wicklow and which was granted permission by the Board on appeal and the same approach should be taken in the current case (i.e. that by noting that the development is for restoration purposes and is not for continuation of quarrying).
- The spirit of the development is to make good any harm done through the process of cessation of the quarrying activities and the restoration of the quarry void and a refusal would not be consistent with the objectives of EU law. It would also create a negative precedent requiring substitute consent to

rectify any harm, particularly if substitute consent may be difficult/impossible to obtain.

- The alternative route to achieve site restoration requires seeking leave for substitute consent, followed by an application for substitute consent and this would be unnecessarily, uncertain and potentially a complex, costly and lengthy process.
- Furthermore, if any step of the process was not successful, then the whole process would fail and the site would remain unrestored and sterilised forever.
- If the current application is consolidating and retaining unauthorised development (as stated by the Board), then the same would be true for the earlier permission for restoration, which was granted permission.

3.2. Planning Authority

- The Board is requested to uphold the decision of the Planning Authority to grant planning permission.

3.3. Eco Advocacy (Appellant)

3.3.1. An initial submission was received by the Board on 24th June 2020. It includes a written submission, photographs and copies of two enforcement notices; PL-ENF-UD202121 (unauthorised development of lands without the benefit of planning permission) and PL-ENF-UD202124 (unauthorised extraction of sand and gravel without the benefit of planning permission).

3.3.2. A further submission was received on 25th June 2020. This included an updated written submission, photographs and land registry folios/file plan details and copies of the two enforcement notices, as referred to above. The principal points raised in the two submissions on file are as follows:

- Applicants have been engaging in significant unauthorised activity on this site, which is also adjacent to the River Boyne and River Blackwater Special Area of Conservation (SAC).

- Large excavating machines have been removing sand and gravel from freshly dug holes on this site to a site across the road (to a grading facility which is understood to be unauthorised: UD.13/117).
- Sand and gravel have been extracted below the water table.
- New enforcement notices have issued by Meath County Council under Sections 154 and 155 of the Act. (PL-ENF-UD202121 and PL-ENF-UD202124).
- There are two registered owners, however the site appears to be worked as one unit.
- Application cannot be considered further in light of the significant recent unauthorised developments.
- Engagement with the application process has required a significant workload and requests compensation under Section 145 of the Act.

4.0 Assessment

4.1. Introduction

- 4.1.1. I have previously carried out an assessment of the initial appeal relating to file reference no. ABP-303182-18 and my report is on that file. My recommendation put forward to the Board was to grant permission subject to 14 conditions. The Board refused permission for the proposed development.
- 4.1.2. Following a legal challenge, the Board's decision to refuse permission for the development was quashed by the Courts and the file has since been remitted back to the Board for a fresh determination. A new file no. ABP-306996-20 has been assigned. This assessment relates to the new information received by the Board including submissions received, the details which are set out above in summary form in Section 3 above. I have also attended the site on 10th day of August 2020.
- 4.1.1. The following sections of my addendum report should be read together with my original report dated 23rd April 2019.

4.2. Planning Assessment

- 4.2.1. The **applicant** states that the quarry has a permission to restore the former sand pit under (TA150244, granted permission on 13th August 2015) and that at the time of writing their submission and currently, the relevant permission remains lawful. It is stated that in order to carry out a proper site restoration project, it would be preferable to import material onto the site and that this forms the rationale for the current application and appeal now before the Board. The applicant states its disagreement with the Board's first decision (now quashed by the High Court) on the basis that the absence of substitute consent for the quarrying operation should not be an impediment for the making good or restoring the quarry for agricultural use. It is submitted that the Board have taken a similar approach for a quarry site in Wicklow under PL27.249167.
- 4.2.2. It is submitted that the requirement for a substitute consent for the past quarrying activities, when no future quarrying is proposed, would not just be unnecessary due to the complex process, but would also be uncertain and would risk the site remaining unrestored and sterilised forever.
- 4.2.3. The **appellant** sets out that the applicants have been engaging in significant unauthorised activity on this site, stating that excavating machines have been removing sand and gravel from freshly dug areas on the site adjacent to the River Boyne and River Blackwater SAC (Site Code 002299) to a site across the road. It is also submitted that sand and gravel has been extracted below the water table. It is stated that new enforcement notices recently issued by Meath County Council under Sections 154 and Section 155 of the Act. (PL-ENF-UD202121 and PL-ENF-UD202124). Overall, it is submitted that it is their view that the application cannot be considered further in light of the significant recent unauthorised developments.
- 4.2.4. The **Planning Authority** have requested the Board to uphold their decision and to grant permission.
- 4.2.5. The points made by the applicant have been taken on board in my initial assessment. The planning history on site, including a permission for restoration works without importing additional material is noted. Appeal case PL27.249167 which relates to the restoration of a quarry site in Wicklow is also noted.

- 4.2.6. The points raised by the appellant are also noted. These relate largely to alleged unauthorised activity being carried out on site. This alleged activity is a matter of enforcement which falls under the jurisdiction of the planning authority. The Act does not preclude the consideration of an appeal where unauthorised development is or may be occurring on the site. On the day of my inspection, there was no activity occurring on site. It is also of relevance to note that photographs which accompany the appellant's submission, while not referenced to any location map, appear to include photographs within a wider area beyond the specific appeal site.
- 4.2.7. I note that the Draft Meath County Development Plan 2021-2027 has emerged since the preparation of my initial assessment under Appeal Ref: ABP-303182-18 dated 23rd April 2019. Similar to the current adopted plan, it contains policies to support the traditional economic base of the county, including extractive activities (mining and quarrying), for example, RUR OBJ 41 – 'To ensure that all quarrying activities and projects associated with the extractive industry comply with all relevant Planning and Environmental legislation'. I also note that the Regional Spatial and Economic Strategy for Eastern and Midlands Region was adopted in 2019. It continues to support extractive industries as appropriate, e.g. under Regional Policy Objective (RPO) 6.
- 4.2.8. Having regard to all of the above information received and considered and the planning context which exists, I am of the view that the initial recommendation to grant permission for the development should remain.

4.3. **Environmental Impact Assessment**

- 4.3.1. In my original consideration of the proposed development, I carried out an assessment of the significant effects on the environment which would likely result from the proposed restoration and related development.
- 4.3.2. I have at this point considered the new information received by the Board. I note that the appellant has raised concerns around works carried out recently on site, including alleged unauthorised excavations below the water table. As stated above, these are issues regarding planning enforcement, which are dealt with by the Planning Authority and the Board have no enforcement powers or functions on enforcement matters.

- 4.3.3. It is also pointed out by the appellant that the site is adjacent to the River Boyne and River Blackwater SAC (Site Code 002299). In my earlier assessment of Environmental Impacts, particularly under the sub-heading of Surface Water Hydrology and Groundwater/Hydrogeology, I noted that the applicant had stated that the infilling of the existing quarry void would remain above the water table.
- 4.3.4. I previously recommended that in the event of a grant of permission, a condition should attach reinforcing the delivery of commitments given that infilling operations would remain above groundwater level, and that any associated surface water would not interact with the groundwater on the site. I also recommended that a 37m buffer be maintained between the works and the River Boyne, a requirement which fed into the recommended schedule of conditions. In accordance with my previous conclusion under the heading of Hydrology and Groundwater/Hydrogeology, I remain satisfied that subject to conditions, the proposed development would have no material or significant impacts on the surface water hydrology or groundwater/hydrogeology environment.
- 4.3.5. No further environmental issues beyond those considered and set out in my original report arise and the reasoned conclusion arrived at still stands.

4.4. **Appropriate Assessment**

- 4.4.1. As stated above, the appellant makes reference to the site being located adjacent to the Boyne River which is part of the River Boyne and River Blackwater SAC. This European site along with the River Boyne and Blackwater SPA were both screened in for appropriate assessment in my original assessment. Based on the new information received by the Board and as set out above and noting the current generic conservation objectives for both of these sites (April 2020), I am satisfied that no further issues arise in relation to (a) screening for appropriate assessment – Stage 1 or (b) for the carrying out of appropriate assessment – Stage 2 on the implications of the proposal on the River Boyne and River Blackwater SAC and the River Boyne and Blackwater SPA in view of the conservation objectives of these sites.
- 4.4.2. Following the carrying out of the original appropriate assessment and noting the new information on the current remitted file, I am satisfied that the proposed

development, would not adversely affect the integrity of The River Boyne and Blackwater SAC, the River Boyne and Blackwater SPA or any other European sites in view of the sites' Conservation Objectives. I consider that no reasonable doubt remains as to the absence of such effects.

5.0 Conclusion and Recommendation

5.1. On the basis of the above assessment, my previous recommendation to the Board still stands and I recommend that the Board grant permission for the proposed development for the reasons and considerations, and subject to conditions, as set out in the inspectors report (with minor updates) under file reference ABP-303182-18 dated 23rd April 2019. An updated draft order for consideration by the Board is set out below.

Draft Order:

Recommendation

On the basis of the inspector's assessments dated 19th April 2019 and the 10th day of August 2020, I recommend that the Board grant permission for the proposed development for the reasons and considerations, and subject to conditions, set out below.

Reasons and Considerations

Proper Planning and Sustainable Development

Having regard to:

- the nature and scale of the development as set out in planning application documentation and the pattern of development in the area;
- the current excavated state of the site in a former sand and gravel quarry;
- the applicable legislative and policy context, including in particular the provisions of the Eastern-Midlands Region Waste Management Plan 2015-

2021, the provisions of the Regional Spatial & Economic Strategy, the Meath County Development Plan 2013 – 2019, the Waste Framework Directive 2008/98EC and A Resource Opportunity – Waste Management Policy in Ireland, July 2012;

- the Environmental Impact Assessment report and information in support of the application and also the licencing regime under which the operational phase of the facility would be regulated;
- the contents of the appeal, the observation and the responses to the appeal and the subsequent submissions received on the remitted appeal case;
- the reports and recommendations of the Planning Inspector including the examination, analysis and evaluation undertaken in relation to the proper planning and sustainable development, appropriate assessment and environmental impact assessment;

the Board concluded that, subject to compliance with the conditions set out below, the proposed development would not have unacceptable impacts on the environment, including water quality, would not seriously injure the amenities of the area and would be acceptable in terms of traffic safety and convenience. The restoration of the existing quarry void as proposed would improve the visual and landscape characteristics in the vicinity. The proposed development would, therefore, be in accordance with the proper planning and sustainable development of the area.

Environmental Impact Assessment

The Board completed an environmental impact assessment of the proposed development, taking into account:

- (a) the nature, scale, location and extent of the proposed development in a previous worked sand and gravel quarry;
- (b) the Environmental Impact Assessment Report and associated documentation submitted in support of the application;

- (c) all submissions, observations made in the course of the application and the contents of the appeal, observation and response from the applicant and the planning authority in the course of the appeal and new submissions received on the remitted file;
- (d) the Inspector's reports.

The Board considered that the environmental impact assessment report, supported by the documentation submitted by the applicant, identifies and describes adequately the direct, indirect, secondary and cumulative effects of the proposed development on the environment.

The Board agreed with the summary and examination, set out in the Inspector's reports, of the information contained in the Environmental Impact Assessment report and associated documentation submitted by the applicant and submissions made in the course of the application and appeal (including the remitted appeal).

The Board considered, and agreed with the Inspector's reasoned conclusions that the main significant direct and indirect effects of the proposed development on the environment are, and would be mitigated, as follows:

- Potential negative effects on the receiving **soil** and **water** environment, including the adjoining River Boyne, as a result of accidental spillages of chemicals, hydrocarbons or other contaminants entering the groundwater or surface water environments and discharging to the River thereafter during the infilling works and construction and demolition waste recovery activities. The impacts would be mitigated by adherence to best practice, active surface water management ensuring surface water is contained on site, operating above the water table, provision of a 37m buffer area between the River Boyne and the works, where no infilling or such works would take place, and the incorporation of established pollution and sediment control measures.
- Positive slight impacts on **landscape and visual** environment in the long term, once the infilling works are complete and the land is returned to agricultural use. No mitigation is required.

- Positive significant impacts on **population and human health** would arise during the works/operational phase as a result of local employment for the works period and contributing to orderly management of waste in the region. No mitigation is required.

The Board is satisfied that this reasoned conclusion is up to date at the time of taking this decision.

The Board completed an environmental impact assessment in relation to the proposed development and concluded that, subject to the implementation of the mitigation measures proposed in the Environmental Impact Assessment Report, and subject to compliance with the conditions set out below, the effects of the proposed development on the environment, by itself and in combination with other plans and projects in the vicinity, would be acceptable. In doing so, the Board generally adopted the report and conclusions of the Inspector.

Appropriate Assessment

The Board agreed with and adopted the screening assessment and conclusion carried out in the Inspector's report that the River Boyne and River Blackwater SAC (Site Code 002299) and the River Boyne and River Blackwater SPA (Site Code 004232) are the European Sites for which there is a likelihood of significant effects.

The Board considered the Natura Impact Statement and all other relevant submissions and carried out an appropriate assessment of the implications of the proposed development for European Sites in view of the sites' Conservation Objectives for the River Boyne and River Blackwater SAC (Site Code 002299) and the River Boyne and River Blackwater SPA (Site Code 004232). The Board considered that the information before it was adequate to allow the carrying out of an Appropriate Assessment.

In completing the Appropriate Assessment, the Board considered, in particular, the following:

- a. the likely direct and indirect impacts arising from the proposed development both individually and in combination with other plans and projects;
- b. mitigation measures / control measures that are included as part of the

current proposal;

- c. Conservation Objectives for these European Sites;

In completing the Appropriate Assessment, the Board accepted and adopted the Appropriate Assessment carried out in the Inspector's reports in respect of the potential effects of the proposed development on the aforementioned European Sites, having regard to the sites' Conservation Objectives. In conclusion, the Board was satisfied that the proposed development, would not adversely affect the integrity of European sites in view of the sites' Conservation Objectives.

Conditions

1. The development shall be carried out and completed in accordance with the plans and particulars lodged with the application except as may otherwise be required in order to comply with the following conditions. Where such conditions require details to be agreed with the planning authority, the developer shall agree such details in writing with the planning authority prior to commencement of development and the development shall be carried out and completed in accordance with the agreed particulars.

Reason: In the interest of clarity.

2.
 - a) The permission shall apply for a period of ten years from the date of commencement. Following the expiration of this period, the importation of material to the site and operations on site shall cease, unless prior to the end of the period, planning permission shall have been granted for a further period.
 - b) A maximum of 200,000 tonnes of inert waste material shall be imported into the site and the permission shall be completed within a period of ten years from the date of commencement of operations. Following the expiration of this period, the importation of inert waste material to the site and operations on site shall cease, unless prior to the end of the

period, planning permission shall have been granted for a further period.

- c) No development shall commence prior to issuance of an Environmental Protection Agency Waste Licence.

Reason: In the interest of clarity.

- 3. (a) All the environmental and construction mitigation and monitoring measures set out in the Environmental Impact Assessment Report and Natura Impact Statement, shall be implemented in full in accordance with the timelines set out, except as may otherwise be required in any Waste Licence issued by the Environmental Protection Agency in respect of the proposed development or as may otherwise be required in order to comply with the following conditions. In this regard, prior to the commencement of the development such mitigation and monitoring measures shall be set out as a written schedule including committed timelines, and the schedule shall be submitted to and agreed in writing with the planning authority.

Reason: In the interest of clarity and to mitigate the environmental effects of the proposed development.

- 4. a) All ecological avoidance measures shall be implemented in full and carried out in accordance with best ecological practice in consultation with statutory agencies (if necessary).
- b) An ecologist shall be appointed to advise on any works such that they will be carried out in accordance with best practice guidance and all mitigation measures will be undertaken and to liaise and report to statutory bodies as required. The measures shall have regard to an ecological survey carried out prior to the commencement of the development in order to update baseline information of badger and bat species.

- c) A site-specific plan for the prevention of importing invasive alien species onto the site shall be prepared and implemented throughout the carrying out of the development.
- d) A report on the implementation of ecological measures shall be submitted to the Planning Authority upon first operation of the development.

Reason: To adequately protect the biodiversity of the area.

- 5. (a) Prior to commencement of the development, drawings shall be submitted to and agreed in writing with the Planning Authority which shall detail existing ground levels, water table levels and proposed locations of infilling operations which shall remain above the water table.

(b) The developer shall submit on an annual basis for the lifetime of this grant of permission a record of the quantity of material imported into the site and details, including topographical survey drawings, which facilitates the planning authority to monitor the progress of the phases of restoration.

Reason: To ensure the satisfactory restoration of the site and to facilitate control of the development by the planning authority.

- 6. Measures to ensure the secure fencing of the remaining quarry void and appropriate boundary treatment of the site shall be submitted to, and agreed in writing with, the planning authority and implemented, prior to commencement of operations.

Reason: In the interest of safety and visual amenity.

- 7. The importation of soil and recovery of construction and demolition waste and operation of associated machinery shall be carried out only between the hours of 0800 and 1900 from Mondays to Fridays, between the hours of 0800 and 1400 on Saturdays and not at all on Sundays, Bank or Public

Holidays. Deviation from these times will only be allowed in exceptional circumstances where prior written approval has been received from the planning authority.

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

8. (a) The works to achieve the required visibility sightlines at the entrance as set out on Drawing No. 10499-2006 Rev A shall be carried out and completed prior to the operation of the proposed development.

(b) A traffic management plan for the operations shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.

(c) Details of road signage warning the public of the entrance and of proposals for traffic management at the site entrance, shall be submitted to, and agreed in writing with, the planning authority prior to re-commencement of development at the site.

(d) Pull-in bays shall be completed to the satisfaction of the planning authority prior to acceptance of materials into the site.

(e) A wheel-wash facility shall be provided adjacent to the site exit, the location and details of which shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.

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

9. The imported material to be deposited on the land shall comprise inert soil and topsoil only and shall be levelled, contoured and seeded upon the completion of the works in phases and protected until established.

Reason: In order to assimilate the development into the surrounding rural landscape, in the interest of visual amenity.

10. A 37 metre-wide buffer zone, as stated in the Environmental Impact Assessment Report submitted, shall be maintained between the works area and the edge of the River Boyne channel and no inert material shall be deposited in this area, details of which shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.

Reason: In order to protect the adjoining River Boyne.

11. During infilling operations/restoration, the site shall be screened in accordance with a scheme of screening measures and boundary treatment, details of which shall include all planting proposed on existing and proposed screen berms, details of the ongoing care and management of such planting, as well as details of an adequate barrier to prevent unrestricted access to the site from adjacent lands, shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.

Reason: In the interest of visual amenity and to safeguard the amenities of residential property in the vicinity during the operating phase of the development.

12. The developer shall facilitate the preservation, recording and protection of archaeological materials or features that may exist within the site. In this regard, the developer shall –

- (a) Employ a qualified archaeologist to monitor all groundworks associated with the development at locations where topsoil and subsoil have not been previously quarried out
- (b) Should archaeological material be found during the course of monitoring, the archaeologist may have work on the site stopped, pending a decision as to how best to deal with the archaeology. The

developer shall be prepared to be advised by the Department of Culture, Heritage and the Gaeltacht with regard to any necessary mitigating action (including preservation in situ or excavation) and should facilitate the archaeologist in recording any material found.

- (c) The Planning Authority and the Department of Culture, Heritage and the Gaeltacht shall be furnished with a report describing the results of the monitoring

Reason: To ensure the continued preservation (either in situ or by record) of places, caves, sites, features or other objects of archaeological interest.

13. The developer shall pay to the planning authority a financial contribution as a special contribution under section 48(2) (c) of the Planning and Development Act 2000 in respect of specific road improvement works necessary to facilitate the development and which are not covered in the adopted Development Contribution Scheme. The amount of the contribution shall be agreed between the planning authority and the developer or, in default of such agreement, the matter shall be referred to An Bord Pleanála for determination. The contribution shall be paid prior to commencement of development or in such phased payments as the planning authority may facilitate and shall be updated at the time of payment in accordance with changes in the Wholesale Price Index – Building and Construction (Capital Goods), published by the Central Statistics Office.

Reason: It is considered reasonable that the developer should contribute towards the specific exceptional costs which are incurred by the planning authority which are not covered in the Development Contribution Scheme and which will benefit the proposed development.

14. Prior to commencement of development, the developer shall lodge with the planning authority a cash deposit, a bond of an insurance company, or such other security as may be acceptable to the planning authority, to

secure the satisfactory completion of the site restoration, coupled with an agreement empowering the planning authority to apply such security or part thereof to such reinstatement. The form and amount of the security shall be as agreed between the planning authority and the developer or, in default of agreement, shall be referred to An Bord Pleanála for determination.

Reason: To ensure the satisfactory restoration of the site in the interest of visual amenity.

Patricia Calleary
Senior Planning Inspector

10th August 2020