



Development

(1) Demolition of the existing converted former garage attached to the side of the existing house and existing shed to rear, (2) Construction of 1 No. detached two-storey, three bedroom infill dwelling of 135.3m² with single storey element to side and rear, all to side garden of existing house, (3) Construction of new vehicular entrance to front to serve existing dwelling, (4) Construction of new vehicular access to the rear of the property off existing cul de sac for single car usage for proposed new dwelling and (5) Ancillary site works necessary to facilitate the development including SUDS surface water drainage, site works, boundary treatments and landscaping.

Location

121 Hillside, Dalkey, Co. Dublin, A96 R599.

Planning Authority

Dún Laoghaire Rathdown County
Council

Planning Authority Reg. Ref.	D19A/1003
Applicant(s)	Joan Matthews
Type of Application	Permission
Planning Authority Decision	Grant subject to conditions
Type of Appeal	Third Party v. Decision
Appellant(s)	Simon & Deirdre Torpay Maura & John O’Riordan
Observer(s)	None.
Date of Site Inspection	30 th October, 2020
Inspector	Robert Speer

1.0 Site Location and Description

- 1.1. The proposed development site occupies a corner plot at No. 121 Hillside, Dalkey, Co. Dublin, within an established residential area characterised by conventional suburban housing predominantly composed of two-storey, semi-detached dwelling houses, although there are a number of other housing types in the wider area, including detached units, dormer style / single storey bungalows, and several more contemporary properties. It is located at the intersection of two estate roadways with a small cul-de-sac of housing extending northwards from the junction. Whilst the housing to the east and west of the site broadly follows a regular set back from the public road, the building line of those properties in the cul-de-sac to the north is characterised by a staggered arrangement whilst the ridge heights are also stepped to reflect the prevailing topography.
- 1.2. The site itself has a stated site area of 0.02395 hectares, is irregularly shaped, and comprises the housing plot occupied by the existing semi-detached property with the proposed dwelling to be sited within the side garden of same. It is typical of a conventional suburban layout with front and rear garden areas and off-street car parking accessed via an entrance from the main estate road to the immediate south. The perimeter roadside boundary is defined by blockwork walling (the height of which increases alongside the western site boundary to reflect the change in topography) whilst the front and side garden areas are also enclosed by mature hedging.

2.0 Proposed Development

- 2.1. The proposed development, as initially submitted, consists of the subdivision of the housing plot and the demolition of a single storey annex to the side of the existing dwelling as well as a shed to the rear of the property in order to facilitate the construction of a new detached, two-storey, three-bedroom dwelling house (floor area: 135.3m²) with independent vehicular access via the existing entrance arrangement onto the adjacent public road to the immediate south. The overall design of the proposed dwelling is conventional with a hipped roof detail and a single ground floor annex to the side and rear of the main two-storey construction. The positioning of the proposed dwelling has sought to respect the established building

line of those properties to the east and west, although it will project beyond those properties to the north in the adjacent cul-de-sac. It is proposed to utilise the existing site access to serve the new dwelling house with a second entrance to be provided onto the cul-de-sac to the west. An entirely new and separate vehicular entrance will serve the existing house. Water and sewerage services are available from the public mains network.

- 2.2. In response to a request for further information, revised proposals were subsequently submitted to the Planning Authority which included for the omission of the vehicular access onto the cul-de-sac and the amalgamation of the associated off-street car parking / driveway into the rear garden area of the new dwelling. The internal configuration of the first floor of the proposed dwelling was also amended to provide for 2 No. bedrooms (reduced from the 3 No. bedrooms previously sought).
- 2.3. On 22nd January, 2020 the Planning Authority issued a Certificate of Exemption pursuant to the provisions of Section 97 of the Planning and Development Act, 2000, as amended, with regard to the proposed development.

3.0 Planning Authority Decision

3.1. Decision

- 3.1.1. Following the receipt of a response to a request for further information, on 27th May, 2020 the Planning Authority issued a notification of a decision to grant permission for the proposed development subject to 8 No. conditions which can be summarised as follows:

Condition No. 1 – Refers to the submitted plans and particulars.

Condition No. 2 – Requires the proposed dwelling to be used as a single residential unit and prohibits its subdivision or use as two or more separate habitable units.

Condition No. 3 – Refers to the surface water drainage arrangements.

Condition No. 4 – Refers to the vehicular entrance and requires the applicant to prevent any mud, dirt, debris or building material from being carried onto or placed on the public road or adjoining property

as a result of the site construction works and to repair any damage to the public road arising from the carrying out of those works.

Condition No. 5 - Requires the payment of a development contribution in the amount of €268.86 towards the provision of surface water public infrastructure and facilities benefitting development in the area of the Planning Authority.

Condition No. 6 - Requires the payment of a development contribution in the amount of €6,157 towards the provision of roads public infrastructure and facilities benefitting development in the area of the Planning Authority.

Condition No. 7 - Requires the payment of a development contribution in the amount of €3,996.66 towards the provision of community & parks public infrastructure and facilities benefitting development in the area of the Planning Authority.

Condition No. 8 - Prohibits the carrying out of development until an agreement has been made in writing with the Planning Authority as regards the payment of development contributions.

3.2. Planning Authority Reports

3.2.1. Planning Reports

Details the site context, planning history, and the applicable policy considerations before stating that the overall principle of the proposed infill dwelling is acceptable by reference to the applicable land use zoning, current planning policy (including the National Planning Framework) as regards the consolidation and densification of existing built-up urban areas, and the site location relative to the Dalkey and Glenageary DART stations. It is also stated that the overall design, scale and form of the proposal will integrate satisfactorily with the existing streetscape and that, notwithstanding the planning history of the site, the siting of the dwelling relative to adjacent properties would accord with the provisions of Section 8.2.3.4(v) of the Development Plan as regards the development of corner / side garden sites, including the need to consider established building lines. It is further considered that

the proposal will not have a detrimental impact on the residential amenity of neighbouring properties by reason of overlooking, overshadowing or an unduly overbearing appearance. However, concerns are raised as regards discrepancies in the submitted drawings, the inadequacy of the private open space provision for a three-bedroom dwelling house, the potential encroachment of the property line to be shared with No. 121 Hillside, and the new entrance arrangement proposed onto the adjacent cul-de-sac. The report thus concludes by recommending that further information be sought with respect to the foregoing items.

Following the receipt of a response to a request for additional information, a further report was prepared which recommended a grant of permission, subject to conditions.

3.2.2. *Other Technical Reports*

Municipal Services Dept., Drainage Planning: No objection, subject to conditions.

Transportation Planning: An initial report emphasised the desirability of avoiding further on-street car parking at this location and also stated that the new access onto the adjacent cul-de-sac would constitute a traffic hazard. It subsequently recommended that further information be sought in respect of a number of items, including the proposed access and car parking arrangements.

Following the receipt of a response to a request for additional information, a further report was prepared which stated that the 2 No. separate access points onto Hillside Road were a hazard and that a shared entrance of up to 4m in width should be considered as an alternative. It was also submitted that inadequate details had been provided as regards the dishing and strengthening etc. of the public footpath to accommodate the new site access.

3.3. **Prescribed Bodies**

Irish Water: No objection, subject to conditions.

3.4. **Third Party Observations**

- 3.4.1. A total of 22 No. submissions were received from interested third parties, however, in the interests of conciseness, and in order to avoid unnecessary repetition, I would advise the Board that the principle grounds of objection / areas of concern raised therein can be derived from my summation of the grounds of appeal.

4.0 Planning History

4.1. *On Site:*

4.1.1. PA Ref. No. D07A/0566 / ABP Ref. No. PL06D.224406. Was refused on appeal on 17th December, 2007 refusing Joan Matthews permission for the demolition of an existing converted former garage attached to side of the existing house and the construction of a new separate two-storey dwelling house.

- Having regard to its scale, nature, design and location forward of the building line, it is considered that the proposed development would conflict with the architectural pattern of the street, would be out of character with houses in the surrounding area and would be visually obtrusive in the streetscape. The proposed development, by itself or by the precedent which the grant of permission for it would set for other relevant development, would, therefore, be contrary to the proper planning and sustainable development of the area.

4.1.2. PA Ref. No. D05A/1330 / ABP Ref. No. PL06D.216905. Was refused on appeal on 31st July, 2006 refusing Joan Matthews permission for the demolition of an existing converted former garage attached to side of the existing house and the construction of a new separate two-storey dwelling house with new vehicular access.

- It is considered that the proposed development would by reason of its scale, nature, design and location forward of the building line, conflict with the architectural pattern on the street, would be out of character with the existing houses in the area and would be visually obtrusive on the streetscape. The proposed development, by itself or by the precedent which the grant of permission for it would set for other relevant development, would, therefore, be contrary to the proper planning and sustainable development of the area.

4.1.3. PA Ref. No. D00A/0302. Was refused on 26th May, 2000 refusing Michael Matthews outline planning permission for a two-storey detached dwelling and new entrance.

- The proposed development would seriously injure the residential amenity of the adjoining properties as it would infringe upon an existing building line in the area of Hillside. Furthermore, the proposed development does not comply with the requirements of the Dun laoghaire Rathdown County Development Plan 1998, with regard to the private open space and safe entry egress from

the site. The proposed development would seriously injure the amenities, or depreciate the value of property in the vicinity. Therefore, the proposed development is considered to contravene the Development Plan objective for the area and would be contrary to the proper planning and development of the area.

5.0 Policy and Context

5.1. National and Regional Policy

- 5.1.1. The '*Sustainable Residential Development in Urban Areas, Guidelines for Planning Authorities, 2009*' note that in general, increased densities should be encouraged on residentially zoned lands and that the provision of additional dwellings within inner suburban areas of towns or cities, proximate to existing or due to be improved public transport corridors, has the potential to revitalise areas by utilising the capacity of existing social and physical infrastructure. Such developments can be provided either by infill or by sub-division. In respect of infill residential development potential sites may range from small gap infill, unused or derelict land and backland areas, up to larger residual sites or sites assembled from a multiplicity of ownerships. In residential areas whose character is established by their density or architectural form, a balance has to be struck between the reasonable protection of the amenities and the privacy of adjoining dwellings, the protection of established character, and the need to provide residential infill.

5.2. Development Plan

- 5.2.1. ***Dún Laoghaire Rathdown County Development Plan, 2016-2022:***

Land Use Zoning:

The proposed development site is zoned as 'A' with the stated land use zoning objective '*To protect and-or improve residential amenity*'.

Other Relevant Sections / Policies:

Chapter 2: Sustainable Communities Strategy:

Section 2.1: Residential Development:

Policy RES3: Residential Density

It is Council policy to promote higher residential densities provided that proposals ensure a balance between the reasonable protection of existing residential amenities and the established character of areas, with the need to provide for sustainable residential development. In promoting more compact, good quality, higher density forms of residential development it is Council policy to have regard to the policies and objectives contained in the following Guidelines:

- ‘Sustainable Residential Development in Urban Areas’ (DoEHLG 2009)
- ‘Urban Design Manual - A Best Practice Guide’ (DoEHLG 2009)
- ‘Quality Housing for Sustainable Communities’ (DoEHLG 2007)
- ‘Irish Design Manual for Urban Roads and Streets’ (DTTaS and DoECLG, 2013)
- ‘National Climate Change Adaptation Framework
- Building Resilience to Climate Change’ (DoECLG, 2013)

Policy RES4: Existing Housing Stock and Densification:

It is Council policy to improve and conserve housing stock of the County, to densify existing built-up areas, having due regard to the amenities of existing established residential communities and to retain and improve residential amenities in established residential communities.

Section 8.2.3.4: Additional Accommodation in Existing Built-up Areas:

(v) Corner/Side Garden Sites:

Corner site development refers to sub-division of an existing house curtilage and/or an appropriately zoned brownfield site to provide an additional dwelling in existing built up areas. In these cases the Planning Authority will have regard to the following parameters (Refer also to Section 8.2.3.4(vii)):

- Size, design, layout, relationship with existing dwelling and immediately adjacent properties.

- Impact on the amenities of neighbouring residents.
- Accommodation standards for occupiers.
- Development Plan standards for existing and proposed dwellings.
- Building lines followed where appropriate.
- Car parking for existing and proposed dwellings.
- Side/gable and rear access/maintenance space.
- Private open space for existing and proposed dwellings.
- Level of visual harmony, including external finishes and colours.
- Larger corner sites may allow more variation in design, but more compact detached proposals should more closely relate to adjacent dwellings. A modern design response may, however, be deemed more appropriate in certain areas in order to avoid a pastiche development.
- Side gable walls as side boundaries facing corners in estate roads are not considered acceptable. Appropriate boundary treatments should be provided both around the site and between the existing and proposed dwellings. Existing boundary treatments should be retained where possible.
- Use of first floor/apex windows on gables close to boundaries overlooking roads and open spaces for visual amenity and passive surveillance.

It is also recognised that these sites may offer the potential for the development of elderly persons accommodation of more than one unit. This would allow the elderly to remain in their community in secure and safe accommodation. At the discretion of the Planning Authority there may be some relaxation in private open space and car parking standards for this type of proposal.

Section 8.2.3.5: *Residential Development – General Requirements*

Section 8.2.4.9: *Vehicular Entrances and Hardstanding Areas*

Section 8.2.8.4: *Private Open Space - Quantity*

5.3. Natural Heritage Designations

5.3.1. The following natural heritage designations are located in the general vicinity of the proposed development site:

- The Dalkey Coastal Zone and Killiney Hill Proposed Natural Heritage Area (Site Code: 001206), approximately 500m southeast of the site.
- The Dalkey Islands Special Protection Area (Site Code: 004172), approximately 1.3km east of the site.
- The Rockabill to Dalkey Island Special Area of Conservation (Site Code: 003000), approximately 1.5m east of the site.

5.4. EIA Screening

5.4.1. Having regard to the minor nature and scale of the development proposed, the site location outside of any protected site, the nature of the receiving environment in an existing built-up area, the intervening pattern of development, the limited ecological value of the lands in question, the availability of public services, and the separation distance from the nearest sensitive location, there is no real likelihood of significant effects on the environment arising from the proposed development. The need for environmental impact assessment can, therefore, be excluded at preliminary examination and a screening determination is not required.

6.0 The Appeal

6.1. Grounds of Appeal

6.1.1. *Simon & Deirdre Torpay:*

- The proposed dwelling house is of an excessive scale and size relative to the application site and is out of character with the prevailing pattern of development in the surrounding area.
- The overall design, scale, appearance and positioning of the proposed dwelling house forward of the established building line within the adjacent cul-de-sac will be detrimental to the visual amenity of the existing streetscape. It

will degrade the existing 'Garden City' layout which the Development Plan commits to protect.

- The remaining open space will be unable to accommodate tree planting of the size and type characteristic of Hillside as the area will be overshadowed and stunted. Furthermore, there is little prospect of any new planting as the rear garden area will be minimal in the context of the Development Plan.
- The amended proposal submitted in response to the request for further information details that the existing front garden area will be converted to provide for a substantial expanse of car parking and associated access. This will further erode the existing 'Garden City' layout.
- By way of context, the Board is advised that Hillside is characterised by low density housing laid out on the 'Garden City' model with an emphasis on creating a quality place for families. This type of housing provides for strong features with generous individual plots affording ample space for children's play and tree planting. The area is further complemented by tree planting within the grass verges as evident at the splayed corners / junctions.

Section 8.2.3.4(vii) of the Development Plan acknowledges the significance of the 'Garden City' estate layouts and stresses how any infill proposal must retain the physical character of these areas, including features such as gateways, trees, and landscaping. The Council has also acknowledged that this protection is needed in areas that do not otherwise benefit from designation as an Architectural Conservation Area or similar.

The subject proposal involves the construction of an intrusive development forward of the established building line which would unacceptably disrupt the symmetry of this planned estate. Therefore, it materially contravenes the Development Plan and should be refused permission.

- When taken in combination with No. 136 Hillside, the proposed development site defines a gateway entrance to the neighbouring cul-de-sac. This is a formal and carefully constructed expression of civic design as the housing frames the cul-de-sac entrance. Other notable features include the consistent building line that gives the arrangement a pleasant harmony, the narrow width of the cul-de-sac relative to nearby roads, and the chamfered corners of Nos.

121 & 136 which also serve to define the entrance to the cul-de-sac. No allowance has been made for the protection of these essential features.

- The 2 No. vehicular entrances onto the roadway and the associated boundary treatment (as shown on the revised site layout plan received in response to the request for further information) are entirely out of keeping with the surrounding area and would contravene the applicable land use zoning objective which seeks '*To protect and-or improve residential amenity*'.
- Section 8.2.4.9(ii) of the Development Plan seeks to protect streetscape heritage by stating that vehicular entrances and off-street parking provision should not dominate the property frontage. This is especially relevant to Hillside in light of the impact on the 'Garden City' layout.
- It is not accepted that the parking manoeuvres shown on the swept-path analysis are feasible. The parking spaces would overleap with each other obstructing pedestrian movements. Cars would also be forced to park close together and at skewed angles thereby making it impossible to open passenger doors. By extension, the dividing property line would be arbitrary.
- Existing housing in Hillside benefits from front and rear gardens with the front areas proving to be especially beneficial during the COVID-19 pandemic as they facilitate social distancing while yielding valuable amenity space for households.

Section 8.2.4.9(iii) of the Development Plan aims to protect residential amenity by, inter alia, retaining ample front garden areas for housing such as that in Hillside. It states that at least one third of such areas should be retained in grass or some other landscape treatment. The submitted proposal will result in the loss of the front garden and materially contravenes the Plan.

- The proposed development will result in those properties / gardens to the immediate north of the site experiencing a loss of sunlight / daylight. This overshadowing would likely be excessive and in contravention of the land use zoning objective.
- The rationale of the case planner in determining that the private open space provision was acceptable (in reference to the reduction from a three-bedroom

to a two-bedroom dwelling) is questionable. The revised design does not provide for a reduction in the internal space / dimensions whilst the internal partitions remain largely *in situ* and the fenestration unchanged. If the revised proposal were to be implemented, the original three-bedroom layout could be installed.

- The excessive scale and bulk of the proposal, in addition to the breach of the building line, is of particular concern to local residents. These issues were not adequately addressed by the Planning Authority in its request for further information.
- Section 8.2.3.4 of the Development Plan refers to the provision of a dwelling house in the side garden of an existing property and sets out certain preconditions, such as retaining porous green spaces and maintaining the building line where appropriate.

The consistent front building line / set back of houses in Hillside derives from its 'Garden City' layout and is a characteristic that contributes to the residential amenity of the area. Furthermore, given that Hillside has no public open space, the building line and generous corner house plots also contribute to the aspect of neighbouring housing by upscaling the junction and giving it a more open outlook. To allow the corner plots to be developed for housing purposes would disrupt the formal layout and would result in the loss of an open historic aspect at Hillside.

- The submitted plans provide for a material breach of the building line by c. 7m with the result that the western elevation of the proposed dwelling would present as a large dark intrusion at the entrance to the cul-de-sac.
- The proposed development would set an undesirable precedent that would detract from the character of the cul-de-sac.
- There are concerns that the proposed development could give rise to a potential nuisance / hazard as regards its connection to piped services.
- The Council is not entitled to permit the use of the combined drain which traverses private property to the rear of No. 120 Hillside as it is privately owned and maintained by the residents of several adjoining houses. In

support of the foregoing, the Planning Authority has previously acknowledged this interpretation through its imposition of Condition No. 4 with respect to PA Ref. No. D05A/1330 which stated the following:

'The applicants are responsible for acquiring any rights or permission necessary to connect to or to increase the discharge into or to build over, or divert, or otherwise alter any private drains not in their exclusive ownership or control and for ensuring their adequacy'.

- The separation between the western elevation of the proposed dwelling and the watermain does not comply with the minimum requirements of Irish Water. Concerns also arise as regards the surface water drainage arrangements and compliance with the Building Regulations, particularly in light of the potential implications for third parties. For example, No. 122 Hillside is located at a much lower level and there are concerns that during heavy rainfall surface water runoff could flow into that property thereby potentially undermining the stability of walls and other structures.

Similar concerns arise with respect to the requirements of Gas Networks Ireland.

- The Board is invited to refuse permission based on the following:
 - Conflict with the architectural pattern on the street by reason of scale, design and breach of the building line.
 - Serious injury to the amenity of adjoining properties
 - Insufficient private open space
 - Visual intrusion
 - Hazardous entrance
 - Undesirable precedent
 - Devaluation of neighbouring properties.

6.1.2. *Maura & John O’Riordan:*

- The proposed dwelling is larger and more imposing than previous proposals refused on site with the Board having found its predecessors to be *‘obtrusive in the streetscape’*.
- The application site occupies a significantly more elevated position than those properties to the immediate north with the result that the proposed dwelling will overshadow adjacent housing and appear unacceptably visually imposing / domineering.
- There is almost unanimous opposition to the proposal from the occupants of affected properties.
- With respect to the ‘densification’ of existing built-up areas, Section 2.1.3.4 of the Development Plan states that proposals should be assessed *‘having due regard to the amenities of existing established residential communities and to retain and improve residential amenities in established residential communities’*.

The existing dwelling at No. 121 Hillside enjoys a large side garden area, however, it is readily apparent that the rationale for the provision of this space was to ensure that neighbouring properties within the cul-de-sac to the north would not be overlooked or physically imposed upon by any new construction in that area. Accordingly, it is this aspect of No. 121 Hillside which serves as an ‘amenity’ for the benefit of the cul-de-sac. In effect, although the garden area in question belongs to No. 121 Hillside, the unencumbered clear space above provides amenity to the dwellings behind it.

- The Development Plan states that *‘Higher densities should have regard to surrounding dwellings and should be achieved in tandem with the protection of the amenity’* of existing and *‘future residents’*. Therefore, current policy acknowledges that densification is not the only issue to be considered in the assessment of development proposals.
- The proposed development does not involve the construction of an ‘infill’ dwelling and is instead subject to the provisions of Section 8.2.3.4(v) of the Development Plan which concerns the sub-division of corner / side garden

sites to provide an additional dwelling in existing built up areas. Section 8.2.3.4(v) imposes a number of conditions which (inter alia) demand that decisions be related to *'immediately adjacent properties'*. It also requires that *'Building lines [be] followed'* before adding *'where appropriate'*. It is readily apparent that the requirement to follow the building line was intended to apply in instances such as the subject proposal.

- No written record of the pre-planning consultations has been made available for review as part of the subject application.
- It is queried whether pre-planning discussions should be open to parties other than the applicant.
- The proposed dwelling is larger than the existing residence at No. 121 Hillside and significantly greater in size than most of the other houses along Hillside Road. Whilst the original planning application described the proposed development as a three-bedroom house, the proposal was subsequently amended in response to the request for further information and the dwelling referred to as a two-bedroom property. It is submitted that this revision was clearly undertaken with a view to circumventing the parking requirements and that the dwelling could easily be subdivided again into a three, four or five bedroom property.
- The following servicing / infrastructural issues have not been adequately addressed given the circumstances of the application:
 - The inability to provide a 5m separation between the proposed soakaway and dwelling houses and the roadway.
 - The failure to achieve a 3m separation between housing and the watermain.
 - The requirement to obtain the necessary consent to connect into a private sewer / drainage system.
 - The failure to maintain one third of the garden area in grass or landscape as per Section 8.2.4.9 of the Development Plan.

6.2. Applicant Response

- The third party appeals make a number of inaccurate and unsubstantiated statements, all of which have been comprehensively dealt with in the application, the decision of the Planning Authority, and this response. The previous refusals have also been fully addressed in the carefully designed and improved scheme as submitted.
- The design of the proposal represents an appropriately scaled response that achieves the correct balance between the utilisation of this large residentially zoned site and the maintenance of the residential amenity of both the existing dwelling and neighbouring properties.
- The proposed development site is well connected to a range of services and facilities being within 850m of the DART station and Castle Street in Dalkey as well as high frequency bus routes. In this regard, current planning policy seeks to encourage increased densities in such areas provided the development respects the character and visual amenity of the area and achieves the necessary standards to ensure an appropriate level of residential amenity for both existing and future housing. This is reflected in previous grants of permission within the side garden areas of existing dwellings in the local area.
- The application site is zoned as 'A' with the land use zoning objective '*To protect and-or improve residential amenity*'. The County Development Plan states that as a general principle, on the grounds of sustainability, the objective should be to optimise the density of development in response to the type of site, its location, and the accessibility of public transport, however, the overriding concern should be the quality of the residential environment proposed with higher densities only considered acceptable if all of the criteria which contribute to that environment are satisfied i.e. higher densities must not be achieved at an unacceptable cost to the residential amenity of surrounding properties. The subject proposal fully conforms with the zoning objective and the foregoing principles.
- The subject site is located in an established and evolving suburban district where the principle of residential development is acceptable. It is also

important to note that there are no architectural restrictions on the development of the site and it is not in an Architectural Conservation Area.

- The subject proposal has comprehensively addressed the previous reasons for refusal issued under ABP Ref. Nos. PL06D.216905 & PL06D.224406. It proposes a wholly different and more considered design.
- The stepping of the dwelling forward of those properties within the adjacent cul-de-sac is not considered to be grounds for refusal. The primary building line is that alongside the main Hillside road and it is clear that within the cul-de-sac the building line is inconsistent with Nos. 122/123 sitting c. 2m forward of Nos. 124/125 and c. 3m forward of Nos. 126/127. Although the proposed dwelling will be c. 4.5m forward of No. 122, the separation of c. 12m compared to the immediately adjoining nature of the houses within the cul-de-sac, means that it will not result in an inconsistent form of development at odds with the character of the area.
- The design and materials proposed provide for a level of visual harmony that reflects the area. This was accepted by the case planner in their conclusion that the proposal would not adversely impact on residential amenity or detract from the character of the area.
- The proposal fully accords with Section 8.2.4.3(v) of the Development Plan as regards the development of corner sites.
- The proposed development will have a *de minimis* impact on the residents of Nos. 120 & 122 Hillside.
- Local opposition to the development is not an indicator of whether the proposal accords with the Development Plan.
- Planning policy has changed significantly since the previous refusals on site with increased densification supported at local, regional and national levels.
- The proposed development will not overshadow or dominate No. 123 Hillside as it will only be visible when standing in the front garden / driveway of that property. The fact that the new dwelling will be visible, which appears to be the sole argument of these appellants, is not a reasonable ground for refusal.

- Section 8.2.3.4(v) of the Development Plan details a set of parameters that the Planning Authority should consider in the assessment of proposals for the development of corner sites. Furthermore, it should be noted that the subject application was assessed as a corner site by the Planning Authority and not as an 'infill' scheme as inferred in the grounds of appeal.

The proposal follows the predominant building line along the main road; does not impact on the amenities of neighbouring properties; and satisfies all the required standards for future occupants. Adequate provision has been made for off-street car parking for both the existing and proposed dwellings whilst side access has also been provided to both properties (including level rear garden areas that significantly exceed the requirements of the Development Plan). The redesign of the proposed house has also ensured that there is a high degree of visual harmony between it and existing properties.

- The appellants are incorrect in their assertion that the building line within the cul-de-sac must be adhered to at all costs. It is apparent that the building line in the cul-de-sac is not consistent as it continually steps out from north to south and this is reflected in the side gable of the proposed house which, due to its separation distance, ensures that the new dwelling will not negatively impact on the amenity or character of the area.
- All pre-planning consultations were undertaken openly and in accordance with Section 247 of the Planning and Development Act, 2000, as amended.
- The proposed dwelling is of a similar gross floor area as the existing house, however, its mass and form is intrinsically different due to the fact that the majority of the floorspace is at ground floor level.
- With regard to the assertion in the grounds of appeal that the proposed dwelling has been reduced to two bedrooms in order to comply car parking standards and that it could subsequently be converted into a three-bedroom property without planning permission, the Board is advised that the 2 No. double bedrooms proposed are not significantly above the minimum size requirements of the appropriate housing guidelines.
- It is considered that the appellants' photomontage of the proposal in combination with a similar development on the opposite corner of the cul-de-

sac misrepresents the position and scale of the proposed dwelling which is significantly narrower and lighter in form.

- Any grant of permission for a similar development on the opposite side of the cul-de-sac would not, contrary to the claim of a previous inspector, have a detrimental impact on the surrounding area.
- The proposed design with a fully hipped roof visible when viewed from Hillside Road and the cul-de-sac provides for a form that is fully integrated with the streetscape along both roads. The design of the proposal is well considered and ensures an appropriate side garden development that does not negatively impact on the area.
- The proposal will not give rise to an overbearing impact on neighbouring properties or when viewed from the public road.
- The setback of the first floor element from the northern and western site boundaries is sufficient to avoid any overbearing impact on adjacent properties.
- By way of precedent, the Board is referred to ABP Ref. No. ABP-306605-20 which has a similar context as the subject proposal and involves a side garden development that protrudes beyond the front elevation of houses in a cul-de-sac to the rear.
- The reference to PA Ref. No. D11A/0299 is of no relevance to the subject appeal and should be dismissed as it concerns an entirely different format of development (the construction of 2 No. semi-detached dwellings within the side garden of a single storey property) which was refused permission.
- Consideration should be given to the precedent set by the grants of permission issued in respect of PA Ref. Nos. D07A/1152 & D09A/0160 both of which were granted permission and involved the development of corner sites without detriment to residential or visual amenity.
- Although the entrance to the cul-de-sac is splayed and attractive, there is nothing in the Development Plan which states that side garden areas such as the subject site should not be developed. Instead, the densification of existing

suburban areas is actively encouraged, particularly within easy walking distance of public transport and local services.

- The proposed development will have a very minor impact on the streetscape.
- The access arrangement proposed has been deemed acceptable by the Planning Authority while the car parking layout is also reasonable and appropriate to the context.
- Both the existing and proposed dwelling houses will be adequately served by private open space in excess of Development Plan standards.

6.3. Planning Authority Response

- The reasoning on which the Planning Authority's decision is based, as per the plans and particulars submitted with the application on 19th December, 2019 and as clarified by way of the significant further information submitted on 11th March, 2020, is set out in the planning report as has been forwarded to the Board. It is considered that said report deals fully with all the issues raised in and justifies the decision to grant permission.

6.4. Observations

None.

6.5. Further Responses

None.

7.0 Assessment

7.1. From my reading of the file, inspection of the site and assessment of the relevant local, regional and national policies, I conclude that the key issues raised by the appeal are:

- The principle of the proposed development
- Overall design and layout
- Impact on residential amenity

- Traffic implications
- Other issues
- Appropriate assessment

These are assessed as follows:

7.2. The Principle of the Proposed Development:

- 7.2.1. With regard to the overall principle of the proposed development, it is of relevance in the first instance to note that the subject site is zoned as 'A' with the stated land use zoning objective '*To protect and-or improve residential amenity*'. In addition to the foregoing, it should also be noted that the surrounding area is residential in character and that the prevailing pattern of development in the immediate vicinity of the application site is dominated by conventional housing construction. In this respect, I would suggest that the proposed development site can be considered to comprise a potential infill site / plot subdivision situated within an established residential area where public services are available and that the development of appropriately designed infill housing would typically be encouraged in such areas provided it integrates successfully with the existing pattern of development and adequate consideration is given to the need to protect the amenities of existing properties. Such an approach would correlate with the wider national strategic outcomes set out in the National Planning Framework 'Project Ireland: 2040', including the securing of more compact and sustainable urban growth such as is expressed in National Policy Objective 35 (as referenced by the case planner) which aims to '*increase residential density in settlements, through a range of measures including reductions in vacancy, reuse of existing buildings, infill development schemes, area or site-based regeneration and increased building heights*'.
- 7.2.2. Further support is lent to the proposal by reference to Policy RES4: '*Existing Housing Stock and Densification*' of the Development Plan, which aims to increase housing densities within existing built-up areas having due regard to the amenities of established residential communities, wherein it is stated that the Planning Authority will encourage the densification of existing suburbs in order to help retain population levels by way of 'infill' housing that respects or complements the established dwelling types. These policy provisions are further supplemented by the guidance set out in Section 8.2.3.4: '*Additional Accommodation in Existing Built-up Areas*' of the Plan

which details the criteria to be used in the assessment of proposals that involve the subdivision of an existing house curtilage and / or an appropriately zoned brownfield site to provide an additional dwelling. Indeed, the '*Sustainable Residential Development in Urban Areas, Guidelines for Planning Authorities, 2009*' acknowledge the potential for infill development within established residential areas provided that a balance is struck between the reasonable protection of the amenities and privacy of adjoining dwellings, the protection of established character, and the need to provide residential infill.

- 7.2.3. The site is also located within walking distance of significant public transportation infrastructure, such as DART and Dublin Bus services (with the Dalkey and Glenageary train stations located within c. 800m and 1,100m walking distance respectively), and is a comparatively short distance from Dalkey village centre as well as local schools, places of worship, employment opportunities, and other amenities.
- 7.2.4. Therefore, having considered the available information, including the site context and land use zoning, and noting the infill nature of the site itself, I am satisfied that the overall principle of the proposed development is acceptable, subject to the consideration of all other relevant planning issues, including the impact, if any, of the proposal on the amenities of neighbouring properties and the overall character of the wider area.

7.3. Overall Design and Layout:

- 7.3.1. In terms of the overall design and layout of the proposed development, having regard to the surrounding pattern of development, in my opinion, the outward appearance of the subject proposal, with particular reference to its height, two-storey construction, elevational treatment, and external finishes, represents an appropriate design response which is in keeping with the prevailing character of the area. For example, the overall form and proportions of the proposed dwelling, including the solid-to-void ratio, are comparable to neighbouring housing whilst the extent of the fenestration used, the provision of a hipped roof detail, the continuation of the eaves height, and the adherence to the established building line along Hillside to the immediate east & west, all serve to provide for a form of construction which is respectful of the architectural rhythm of the existing streetscape and can be

satisfactorily integrated into the area. This conventional design is a notable departure from the more contemporary approach previously refused permission under ABP Ref. Nos. PL06D.224406 & PL06D.216905 and is considerably more complementary to the prevailing pattern of development.

- 7.3.2. With respect to the specific concerns raised in the grounds of appeal that the siting of the proposed dwelling house on this corner plot will undermine the symmetrically planned layout and architectural integrity of the existing built form / splayed junction arrangement that serves to define the entrance to the adjacent cul-de-sac, whilst I would acknowledge that Nos. 121 & 136 Hillside (i.e. the corner properties at the entrance to the cul-de-sac) have been set back a little behind the building line of those properties to the north in order to give a slightly more spacious appearance to the entrance, I am inclined to suggest that comparable infill / corner / side garden development within similar housing areas has become increasingly commonplace and reflects the changing needs and evolution of the urban landscape, particularly in the context of current local and national planning policy. The proposed development represents a new addition to the streetscape that will be clearly discernible from the more established development, and although the new dwelling will project forward of the building line of those properties to the north along the eastern side of the cul-de-sac, it is my opinion that the proposal as submitted (noting its overall scale, form and design) achieves a reasonable balance between respecting the established character of the area, the protection of the amenities and privacy of adjoining dwellings, and the desire to provide for infill development in line with current policy provisions.
- 7.3.3. In support of the foregoing, there is also merit in the case put forward by the applicant that the positioning of the new dwelling will continue the stepped building line within the cul-de-sac and that the key consideration in assessing the proposal by reference to the need to follow building lines '*where appropriate*' as per Section 8.2.3.4: '*Additional Accommodation in Existing Built-up Areas: (v) Corner/Side Garden Sites*' should be its adherence to the pattern of development along the main 'Hillside' roadway to the south. Therefore, I am amenable to the infringement of the building line within the cul-de-sac in this instance.
- 7.3.4. With respect to the suggestion that a grant of permission for the subject proposal would set an undesirable precedent for an equivalent development on the opposing

corner site at No. 136 Hillside, I would not have any overt difficulties in this regard and would accept the increased likelihood of such a scenario. Notwithstanding the assertion that the combined construction of any such dwellings would diminish the existing open character of the cul-de-sac entrance, it could equally be suggested that adjacent housing would be provided with an enhanced sense of enclosure and / or privacy.

- 7.3.5. In terms of private open space provision, I would refer the Board to Section 8.2.8.4: *'Private Open Space – Quantity'* of the Dún Laoghaire Rathdown County Development Plan, 2016-2022 which states that three-bedroom dwelling houses should be provided with a minimum of 60m² of private open space behind the front building line and that any open space to the side of dwellings will only be considered as part of the overall private open space calculation where it comprises useable, good quality space i.e. narrow strips of open space to the side of dwellings will not be included in the calculation. In the case of a two-bedroom dwelling house, a figure of 48m² may be acceptable where it can be demonstrated that good quality usable open space can be provided on site.
- 7.3.6. The subject proposal, as initially lodged with the Planning Authority, provided for the development of a three-bedroom dwelling house, however, the associated private open space provision was noticeably deficient due to the inclusion of an off-street parking area to the rear of the property which was to be accessed via a new entrance arrangement onto the cul-de-sac. Accordingly, revised proposals were subsequently submitted in response to a request for further information which omitted the vehicular access onto the cul-de-sac and amalgamated that area previously occupied by the associated parking space / driveway into the rear garden of the new dwelling. The internal configuration of the first floor of the dwelling was also amended to provide for 2 No. bedrooms (reduced from the 3 No. bedrooms previously sought). These revisions have the effect of increasing the private open space provision to approximately 77m² which clearly exceeds the minimum requirement for both two- and three-bedroom properties as set out in Section 8.2.8.4 of the Development Plan (in the interests of clarity, it should be noted that the amended rear garden provision would be adequate to serve the three-bedroom dwelling house originally proposed on site, subject to the omission of the rear

parking space). I would also advise the Board that sufficient private open space is to be retained to serve the existing dwelling house on site at No. 121 Hillside.

- 7.3.7. In relation to the appellants' concerns as regards the visual impact of the parking provision and the new site entrance to the front of the property, I am satisfied that the impact of such works will be localised and will not have a significant effect on the character or amenity of the wider area.
- 7.3.8. On balance, having regard to the site location, the planning history, the surrounding pattern of development, and the provisions of Section 8.2.3.4(v) of the Development Plan, it is my opinion that the overall design of the proposed development represents an appropriate design response to the site context and achieves a suitable balance between the need to respect the established character and residential amenity of the surrounding area and the desire to provide infill housing on this corner site.

7.4. Impact on Residential Amenity:

- 7.4.1. Having reviewed the available information, and in light of the site context, including its location within a built-up urban area, in my opinion, the overall design, scale, positioning and orientation of the proposed development, with particular reference to its relationship with (and separation from) adjacent housing, will not give rise to any significant detrimental impact on the residential amenity of neighbouring property by reason of overlooking, overshadowing, or an unduly overbearing appearance. In this regard, I am particularly cognisant that any overlooking of No. 122 Hillside to the immediate north will be limited to the front garden area / driveway of that property and thus will not give rise to any significant loss of amenity whilst any overshadowing will be limited in scope and would not be such as to warrant a refusal of permission.
- 7.4.2. With regard to the potential impact of the construction of the proposed development on the residential amenities of surrounding property, whilst I would acknowledge that the proposed development site is within an established residential area and that any construction traffic routed through same could give rise to the disturbance / inconvenience of local residents, given the limited scale of the development proposed, and as any constructional impacts will be of an interim nature, I am inclined to conclude that such matters can be satisfactorily mitigated by way of condition.

7.5. Traffic Implications:

- 7.5.1. The proposed development, as initially submitted to the Planning Authority, sought to utilise the existing site entrance to serve the new dwelling and to provide a second entrance onto the adjacent cul-de-sac whilst the existing house would avail of an entirely new and independent vehicular access to be opened onto the main carriageway to the south (to the east of the existing entrance). This arrangement would have ensured the provision of 2 No. off-street car parking spaces for both the existing (four-bedroom) and proposed (three-bedroom) dwelling houses as per Table 8.2.3: '*Residential Land Use - Car Parking Standards*' of the Development Plan wherein it is stated that parking should be provided at a rate of 2 No. spaces per 3-bed unit+. However, in response to a request for further information wherein the second entrance onto the cul-de-sac was identified as a public (traffic) hazard, amended proposals were subsequently submitted whereby the entrance onto the cul-de-sac (and the associated off-street parking space) were omitted from the development. Notably, whilst this revised layout has had the effect of reducing overall car parking provision on site, the amalgamation of that area previously proposed to be utilised as off-street parking into the rear garden area of the new dwelling serves to provide for a notable improvement in the delivery of adequate private open space for that unit.
- 7.5.2. Having reviewed the available information, and following a site inspection, I would concur with the omission of the vehicular access originally proposed onto the cul-de-sac. In this respect, I would be of the opinion that the sightlines available from any such entrance onto the public road, and particularly the visibility of pedestrians using the adjacent footpath, would be seriously impeded by the existing roadside boundary wall and thus such an arrangement could potentially endanger public safety by reason of traffic hazard. In addition, I am cognisant of the concerns raised by a number of parties as regards the loss of on-street parking that would arise should any such entrance be opened onto the cul-de-sac given the demand for same in the area.
- 7.5.3. With respect to the consequent reduction in off-street parking due to the omission of the entrance onto the cul-de-sac, it should be noted that the amended proposals submitted in response to the request for further information included for a re-configuration of the internal layout of the proposed dwelling house to provide for only

2 No. bedrooms (reduced from the 3 No. bedrooms originally proposed). Whilst I would acknowledge that the internal floorspace of the dwelling has not been reduced and thus it would be feasible to provide the three bedrooms originally envisaged, I do not propose to engage in speculation as regards the future intentions of the owner / occupier and will instead assess the merits of the proposal on the basis of the submitted plans and particulars. Therefore, with regard to the adequacy of the on-site parking arrangements, I would refer the Board to the requirements set out in Table 8.2.3: '*Residential Land Use - Car Parking Standards*' of the Development Plan wherein it is stated that parking should be provided at a rate of 1 No. space per 2-bed unit. Accordingly, the amended proposal satisfies the 'standard' requirement of the Development Plan. In any event, having regard to the infill nature of the site, the desirability in reducing car dependency, the width of the main estate roadway, the established practice of utilising on-street parking in the area, and the site location relative to public transport (i.e. DART and Dublin Bus services), I would be amenable to a relaxation in the specified 'standard' car parking requirement in this instance.

7.5.4. In relation to the access proposed onto the main 'Hillside' road, this will be positioned further away from the junction with the cul-de-sac than the existing entrance and is unlikely to give rise to any significant traffic safety concerns. Furthermore, although it will be necessary for cars availing of the new parking spaces proposed directly in front of No. 121 Hillside to engage in some degree of manoeuvring on site, I would suggest that adequate space is available to accommodate same and that such practices are not uncommon in housing areas.

7.5.5. Therefore, on balance, I am satisfied that the proposed car parking and associated access arrangements are acceptable and that the proposal will not endanger public safety by reason of traffic hazard.

7.6. **Other Issues:**

7.6.1. *Infrastructural / Servicing Arrangements:*

Concerns have been raised as regards the siting of the new dwelling house relative to local services, including the watermain, gas lines, and the surface water drainage infrastructure (with particular reference to the soakaway proposed within the rear garden area), and the need to adhere to the specific requirements of the various regulatory authorities (e.g. Irish Water). Further reference has been made to the

adequacy of the surface water drainage arrangements in light of the potential implications for third parties / neighbouring properties should these prove to be deficient or unsuited to the specifics of the site conditions. In my opinion, such matters generally fall within the remit of other statutory codes / regulatory control such as the Building Regulations etc. and as such any grant of planning permission would not negate the responsibility for adherence to same.

7.6.2. With regard to the proposal to connect into an existing sewer within the rear garden of No. 121 Hillside (i.e. the subject site), which subsequently extends through a number of private properties before discharging to the public mains, and the assertion in the grounds of appeal that this sewer is privately owned and / or maintained and that no consent has been given to connect to same, whilst I would acknowledge the legitimacy of the concerns raised, it should be noted that such shared communal sewers are not uncommon in built-up areas. Moreover, given that the manhole / sewer in question is partially located within the confines of the application site, in my opinion, there would seem to be a reasonable basis on which to assume that the applicant is entitled to avail of same in order to accommodate the proposed development (as would be case if a property owner chose to extend their dwelling house). In any event, I would refer the Board to Section 34(13) of the Planning and Development Act, 2000, as amended, which states that '*A person shall not be entitled solely by reason of a permission under this section to carry out any development*' and thus any grant of permission for the subject proposal would not in itself confer any right over private property.

7.6.3. In relation to the remaining concerns as regards the extent of the front garden areas to be devoted to off-street parking, I am satisfied that the drainage of same can be suitably agreed with the Planning Authority by way of condition in the event of a grant of permission.

7.6.4. *Procedural Issues:*

On the basis of the documentation forwarded to the Board, it would appear that the applicant sought to engage in pre-planning consultations with the Planning Authority pursuant to Section 247 of the Planning and Development Act, 200, as amended, however, no written record of the outcome of these discussions has been made available for review as part of the appeal correspondence. Whilst the Planning

Authority is required under Section 247(5) of the Act to keep a written record of any such consultations (or requests for consultations) and to place a copy of any such records with the documents to which any planning application in respect of the development involved relates, the Board is not empowered to penalise address any failing by the Planning Authority to adhere to this requirement. In any event, Section 247(3) of the Act is clear in that *'The carrying out of consultations shall not prejudice the performance by a planning authority of any other of its functions under this Act, or any regulations made under this Act and cannot be relied upon in the formal planning process or in legal proceedings'*.

- 7.6.5. With respect to the appellants' wider comments as regards the inclusion of other interested parties in pre-planning consultations, at present there is no legal obligation for a prospective applicant to engage in pre-planning discussions with either the Planning Authority or other parties in relation to normal planning applications. I would further suggest that the merits or otherwise of this approach are not pertinent to the determination of this appeal.

7.7. Appropriate Assessment:

- 7.7.1. Having regard to the minor nature and scale of the development under consideration, the site location within an existing built-up area outside of any protected site, the nature of the receiving environment, the availability of public services, and the proximity of the lands in question to the nearest European site, it is my opinion that no appropriate assessment issues arise and that the development would not be likely to have a significant effect, either individually or in combination with other plans or projects, on any Natura 2000 site.

8.0 Recommendation

- 8.1. Having regard to the foregoing, I recommend that the decision of the Planning Authority be upheld in this instance and that permission be granted for the proposed development for the reasons and considerations, and subject to the conditions, set out below:

9.0 Reasons and Considerations

9.1. Having regard to the land use zoning of the site in the current Development Plan for the area, to the infill nature of the site, to the design and scale of the proposed development, and to the nature and pattern of development in the vicinity, it is considered that, subject to compliance with the conditions set out below, the proposed development would not seriously injure the residential or visual amenities of the area or of property in the vicinity, would represent an appropriate residential density, would comply with the provisions of the Development Plan, and would be acceptable in terms of traffic safety and convenience. The proposed development would, therefore, be in accordance with the proper planning and sustainable development of the area.

10.0 Conditions

1. The development shall be carried out and completed in accordance with the plans and particulars lodged with the application as amended by the further plans and particulars submitted on the 11th day of March 2020, 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. Water supply and drainage arrangements, including the attenuation and disposal of surface water, shall comply with the requirements of the planning authority for such works and services, details of which shall be agreed in writing with the planning authority prior to the commencement of development.

Reason: In the interest of public health.

3. The applicant or developer shall enter into water and/or wastewater connection agreement(s) with Irish Water, prior to commencement of development.

Reason: In the interest of public health.

4. All service cables associated with the proposed development (such as electrical, telecommunications and communal television) shall be located underground.

Reason: In the interest of visual and residential amenity.

5. Details of the materials, colours and textures of all the external finishes to the proposed development shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.

Reason: In the interest of visual amenity.

6. Gates at the entrance shall be designed so that they are not capable of being opened outwards.

Reason: In the interests of pedestrian and traffic safety.

7. Site development and building works shall be carried out only between the hours of 0800 and 1900 Mondays to Fridays inclusive, between the hours of 0800 and 1400 on Saturdays and not at all on Sundays or Public Holidays. Deviation from these times shall only be allowed in exceptional circumstances where prior written approval has been received from the planning authority.

Reason: In order to safeguard the residential amenities of property in the vicinity.

8. The construction of the development shall be managed in accordance with a Construction Management Plan, which shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development. This plan shall provide details of intended construction practice for the development, including noise management measures and off-site disposal of construction/demolition waste.

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

9. The developer shall pay to the planning authority a financial contribution in respect of public infrastructure and facilities benefiting development in the area of the planning authority that is provided or intended to be provided by or on behalf of the authority in accordance with the terms of the Development

Contribution Scheme made under section 48 of the Planning and Development Act 2000, as amended. The contribution shall be paid prior to commencement of development or in such phased payments as the planning authority may facilitate and shall be subject to any applicable indexation provisions of the Scheme at the time of payment. Details of the application of the terms of the Scheme 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 to determine the proper application of the terms of the Scheme.

Reason: It is a requirement of the Planning and Development Act 2000, as amended, that a condition requiring a contribution in accordance with the Development Contribution Scheme made under section 48 of the Act be applied to the permission.

Robert Speer
Planning Inspector

23rd November, 2020