



An  
Bord  
Pleanála

## Inspector's Report ABP-308624-20.

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<b>Development</b>	Permission for the relocation of 26 car parking spaces from previously permitted location (PL. Ref No. 13/322 refers).
<b>Location</b>	Fionnuisce, Doughuisce, Galway.
<b>Planning Authority</b>	Galway City Council.
<b>Planning Authority Reg. Ref.</b>	20/223.
<b>Applicant(s)</b>	Albert Jarzebak.
<b>Type of Application</b>	Permission.
<b>Planning Authority Decision</b>	Refuse.
<b>Type of Appeal</b>	First Party
<b>Appellant(s)</b>	Albert Jarzebak.
<b>Observer(s)</b>	None.
<b>Date of Site Inspection</b>	10/02/2021.
<b>Inspector</b>	A. Considine.

## **1.0 Site Location and Description**

- 1.1. The appeal site is located in the suburb of Doughuisce, which lies to the east of Galway City centre. The site comprises part of the wider Fionnuisce residential estate. The site is currently partly fenced off and under development, while it appears that a number of apartments in the development are occupied. Access to the site is over the existing estate road network through the Fearann Ri estate to the east of the subject site. The site, and wider residential area, is accessed off the Doughiska Road which runs in a north west – south east direction to the east of the subject site. The N67 dual carriageway lies further to the east of Doughiska Road.
- 1.2. The site has a stated area of 0.6767 hectares and is long and narrow running in a north east - south west direction. Merlin Park Woods lie to the west and south of the site with residential development, Fionnuisce located to the east. The site fronts onto the primary area of public open space for the wider residential development and the area of the site proposed to be used to relocate car parking spaces to, was permitted to comprise an open space area and a senior play area.

## **2.0 Proposed Development**

- 2.1. Permission is sought, as per the public notices for development which will consist of the relocation of 26 no. car park spaces, from the previously permitted location outside of the site ownership (Pl. Ref. No. 13/322), to a location within the site ownership, including subsequent alterations to site layout, all at Fionnuisce, Doughuisce, Galway. The application included the relevant plans, particulars and completed planning application form.

## **3.0 Planning Authority Decision**

### **3.1. Decision**

The Planning Authority decided to refuse planning permission for the proposed development for the following stated reasons:

1. The proposed development is located in an area reserved under planning reference number 05/508 and planning reference number 13/322, as

communal open space, for the benefit of existing and future residents. The proposed development would result in a significant reduction in quantum, quality and functionality of the existing amenity space, which would be detrimental to the residential amenity of existing and future residents. The proposed development would be contrary to the Policy 2.5 Outer Suburbs of the City Development Plan 2017-2023 which states that it is the policy of the City Council to ensure that sustainable neighbourhoods are places where housing, streets, open spaces and local facilities come together in a coherent, integrated and attractive form, and section 11.3.1(c) Amenity Open Space Provision in Residential Developments which requires that all residential developments shall provide for communal recreation and amenity open space. The proposed development would erode the coherent and integrated layout of open space that can be beneficially used for the enjoyment of residents permitted under planning reference number 05/508 and planning reference number 13/322, would seriously injure existing residential amenities, would create an undesirable precedent for similar type development and consequently would be contrary to the proper planning and sustainable development of the area.

2. The proposed development involves the development of residential open space which is identified under Table 4.2 Open Spaces within the Green network of the City Development Plan 2017-2023 as an integral part of the city's green network of open spaces, natural resources and habitats, providing for general amenity, biodiversity, passive and active recreation, in particular children's play. The proposed development would contravene Policy 4.1 Green Network to provide adequate recreation and amenity open space for the future development of the city, retain, extent and enhance opportunities for recreation within the green network for all members of the community, and enhance linkages and connectivity within the green network. The proposed development would therefore, be contrary to the proper planning and sustainable development of the area.
3. Having regard to the location of the proposed development site in close proximity to Merlin Park Woods which is host to a number of protected species listed for protection under the EU Habitats Directive and the Wildlife

Acts 1976-2000 and their key habitats, the applicant has failed to demonstrate the proposed development would not give rise to an adverse direct, indirect or secondary effect on protected species and therefore the proposed development would be contrary to Policy 4.2 Protected Spaces: sites of European, National and Local Ecological Importance which states that it is the policy of the Council to protect and conserve rare and threatened flora and fauna and their key habitats, (wherever they occur) listed on Annex I and Annex IV of the EU Habitats Directive (92/43/EEC) and listed for protection under the Wildlife Acts 1976-2000

The proposed development would, therefore conflict with the policy of the Planning Authority and be contrary to the proper planning and sustainable development of the area.

### **3.2. Planning Authority Reports**

#### **3.2.1. Planning Reports**

The Planning report considered the proposed development in the context of the details submitted with the application, planning history and the City Development Plan policies and objectives. The report also includes a section on ecology /biodiversity where it notes that 'a number of third-party submissions raise concerns over the impact on the development on Merlin Park Woods....'. As there are no third-party submissions in relation to the subject application, I would consider this an error in the report. The Planning Offices report advises that an Ecological Impact Assessment should accompany the application.

The Planning Report concludes that proposed development is not acceptable as the current application involves the development of designated communal open space reserved under PI Ref. No. 05/508 and PI. Ref. No. 13/322 for the benefit and enjoyment of the residents. Planning Officer recommends that permission be refused for the proposed development, for reasons relating to non-compliance with policies and objectives of the CDP including Policy 2.5 Outer Suburbs, Policy 4.1 Green Network, Policy 4.2 Protected Spaces: sites of European, National and Local Importance, Section 11 Land Use Zoning Objectives and Development Standards and Guidelines.

This Planning Report formed the basis of the Planning Authority's decision to refuse planning permission for 3 stated reasons.

### 3.2.2. Other Technical Reports

None.

### 3.2.3. Prescribed Bodies

None.

### 3.2.4. Third Party Submissions

None.

## 4.0 Planning History

The following is the relevant planning history pertaining to the subject site:

**PA ref: 05/508:** Planning permission granted for a four-storey residential development consisting of 60 no. apartment units (15 no. 3-bedroom units, 30 no. 2-bedroom units and 15 no. 1-bedroom units) on three floors (1st floor comprising of 5 no. 3-bedroom units, 10 no. 2-bedroom units, 5 no. 1-bedroom units. 2nd floor comprising of 5 no. 3-bedroom units, 10 no. 2-bedroom units, 5 no. 1-bedroom units, 3rd floor comprising of 5 no. 3-bedroom units, 9 no 2-bedroom units, 5 no. 1-bedroom units), ground floor consisting of 1 no 2-bedroom unit and internal car parking and all associated site works and services at Fionnuisce, Doughiska, Merlin Park, Galway.

**ABP ref: PL.61.218765 (PA ref: 06/393):** Permission refused for the construction of 4 no. residential units (3 x 2 bed and 1 x 1 bed) over three floors adjoining Block D of the permitted residential development granted under PI. Ref. No. 05/508. This application represents an amendment to the permitted development and will utilise the services, open space and parking already granted. The Board refused for the following 2 reasons:

1. It is considered that the scale of development on those lands subject of planning register reference number 05/508 that would result from the addition of the proposed four number residential units would be excessive, having regard to the standards for density for new

residential development set out in the Galway City Council Development Plan, 2005-2011. Furthermore, it is considered that the addition of the proposed units would adversely affect the quality of communal open space available for the development granted under planning register reference number 05/508. The proposed development would, therefore, seriously injure the amenities of the future residents of the area and be contrary to the objectives of the Development Plan and to the proper planning and sustainable development of the area.

2. The proposed development would be contrary to condition number 4 of the permission granted under planning register reference number 05/508, which refers to the site and adjacent lands to the east and west. Condition number 4 of the said permission required that the development subject of this application not be constructed in order to ensure that the density of the development granted would not compromise the current Development Plan objectives for the area for new residential areas. The proposed development would, therefore, be contrary to the provisions of the Development Plan and to the proper planning and sustainable development of the area.

**PA ref 13/322:** Permission granted for the retention, completion and omissions of 44 partially constructed apartments as previously approved under PA ref 05/508. The proposed works will encompass 1: The retention of the existing block locations, elevational changes and modifications for the completion of the existing blocks C, D & E totalling 44 apartments, including re-configured open space, car parking and footpath/road provisions. 2: The omission of block A and the omission of second storey north facing balconies to all blocks.

The Board will note that the development as constructed appears to reflect this permitted development. The full file was not submitted to the Board but the details of same are available on the Galway City Council website. However, there is adequate information on file to conclude that the area of open space to be transferred to car parking formed part of the applicants' proposals for the site. The car parking provision for the 44 apartments was to be provided within the wider Fionnuisce estate in three areas, one area comprising 10 parking spaces immediately to the

south of the open space area, a second area comprising 14 spaces in front of Block D and the Junior Play Area (located between Blocks D and E) and further spaces proposed in front of, and adjacent to Block E. The following conditions are considered relevant:

1. The development shall be retained / completed in accordance with the application made on 07/11/13, but subject to the requirements of the further conditions hereinafter incorporated.

**Reason:** To ensure that the development is carried out in accordance with the permission and that effective control is maintained.

2. Development Contribution
3. Bond
4. Prior to the commencement of development, a landscaping scheme for the site shall be submitted to and agreed in writing with the Planning Authority. The landscape plan shall be completed by a Chartered or Registered Landscape Architect. The landscape plan shall include a playground to serve the overall Fionnuisce Development and details of access to the Merlin Park Woods. In this regard the applicant shall contact the Parks Section directly.

**Reason:** In the interests of visual amenity.

10. Management Company.

Wider Fionnuisce Site:

**PA ref. 19/121:** Permission was refused for the development of 5 additional terraced houses together with all services. This site is located in the northern area of the wider open space area associated with Fionnuisce and was refused for 5 reasons, including:

1. Being located on lands reserved under the parent permission as public open space
2. Excessive density
3. Negative impact on visual amenity and issues of visual dominance.
4. Substandard with regard to qualitative standards.

5. Lack of vehicle accessibility to a car parking area previously granted and under construction under Pl. Ref. 13/322.

## 5.0 Policy and Context

### 5.1. Development Plan

- 5.1.1. The Galway City Development Plan 2017 – 2023, is the relevant policy document relating to the subject site. The site is zoned R1 Residential where it is the stated objective of the zoning to ‘protect residential amenities and to provide for limited associated uses’. The lands to the north and west are zoned Light Residential for low density residential development while the lands to the south, comprising Merlin Park Woods, is zoned G1 Recreational / Amenity.
- 5.1.2. The site lies within the outer suburb of Doughiska and has been developed with residential buildings and an area of communal open space. The development proposes to provide additional car parking within the area of public open space with the loss of a senior play area associated with the wider Fionnuisce development at that location.
- 5.1.3. The site lies adjacent to Merlin Park Woods, which is identified in the City Development Plan as one of three large Citywide Parks. In this regard, Section 4.4 of the Plan is considered relevant and Policy 4.4.1 Green Spaces: Urban Woodland and Trees states that it is the policy of the City Council to:
  - Manage and develop woodlands in the ownership of Galway City Council for natural heritage, recreation and amenity use, including Terryland Forest Park, Merlin Park Woods, Barna Woods/Lough Rusheen City Park.
  - Integrate existing trees and hedgerows on development sites where appropriate and require tree planting, as part of landscaping schemes for new developments.
  - Continue to promote partnerships with the community for the management and improvement of local open spaces through schemes such as the Community Planting Initiative.



- Prepare and implement a plan which identifies suitable parts of the road and street network for the planting of trees.

5.1.4. The primary purpose of the three City Parks is stated as large-scale open spaces for passive and active recreation, wildlife conservation and education (over 10 hectares). In terms of biodiversity, Merlin Park Woods is described as a mature broad-leaf trees, mixed broad-leaf / conifer woodlands. Policy 4.2 Protected Spaces: Sites of European, National and Local Ecological Importance is considered relevant. It is the stated policy of the CDP to protect, conserve and support the development of an ecological network through the city and to protect local biodiversity areas.

## 5.2. **Natural Heritage Designations**

The site is not located within any designated site. The closest Natura 2000 site is the Galway Bay SAC (& pNHA)(Site Code: 000268) and the Inner Galway Bay SPA (Site Code: 004031) which is located approximately 1.4km to the south of the site.

## 5.3. **EIA Screening**

Having regard to nature and scale of the development, together with the brownfield nature of the site, 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**

This is a First party appeal against the decision of the Planning Authority to refuse planning permission for the proposed development. The issues raised are summarised as follows:

- The applicant does not and cannot obtain sufficient legal interest for the permitted parking spaces outside his ownership. In response, the applicant is seeking to provide for self-sufficient parking within the red line boundary.

- This was met with considerable opposition from the PA but a refusal of planning permission will not help resolve the parking requirement problem on site.
- Reason for refusal no. 1:
  - The appeal sets out the merits of the application.
  - The relocation of the parking spaces will enable areas within the remainder of the Fionnuisce estate to remain as public open space.
  - The communal open space provision within the red line boundary of the site would amount to 1,909m<sup>2</sup> or 28% of the site area, in excess of the CDP requirement of 15%.
  - An argument is made for the consideration of reduced parking on site and it is noted that the parent permission was granted in 2006 at a time when more excessive car parking requirements were in place.
  - Today's guidelines provide for a relaxation in parking standards and in this regard, the appellant asks the Board to consider alternatives as presented.
  - The appeal sets out a justification for reduced parking standards in terms of proximity to existing and propose public transport corridors, the CDP Neighbourhood Concept, 2018 Apartment Guidelines.
  - Two alternative layout options are presented, A which proposes an additional 14 spaces instead of 28, and B where no additional parking spaces are proposed. It is proposed to omit the previously permitted parking spaces to the front of Block E under option B.
  - Given that the proposed development is within reasonable walking distance of a high frequency bus route, the proposed reduced parking provision for the existing apartments can be considered in this case.
- Reason for refusal no. 2:
  - It is submitted that the site is located outside the Green network identified in the CDP.
  - The proposed development does not interfere with Merlin Park Woods.

- As the site is unfinished, functioning open space areas on the site have not been provided to date.
- Under the 2018 Apartment Guidelines, a reduction in open space provision is allowable. The proposed development would provide for 1,351m<sup>2</sup> which is greatly in excess of the 264m<sup>2</sup> requirement under the Guidelines.
- This area of Doughiska has a wealth of communal open spaces including a large park with associated communal / recreational facilities including an astroturf, tennis courts and children's playground c650m by road to the east of the site.
- In the interests of completing the unfinished housing estate, and in the event that the Board are mindful to grant permission for the proposed development and / or alternative layouts A or B as presented in the appeal, the applicant commits to completing the open space areas within 1 year of the grant of permission.
- Reason for refusal no. 3:
  - It is submitted that the location of the proposed works is not in close proximity to Merlin Park Woods.
  - The subject site forms part of an established residential estate / brownfield site.
  - However, in order to address the ecological concerns, an Ecological Report / Opinion is submitted. This report concludes that 'it is not considered likely that the proposed development will have any significant effects on Merlin Park Woods'.

It is requested that the Board grant permission for the proposed development. The appeal includes four appendices as follows:

Appendix 1: Decision of the PA

Appendix 2: Extract from "2017 Annual Progress Report on Actions to Address Resolving Unfinished Housing Developments.

Appendix 3: November 2019 Bus Eireann Presentation entitled "Galway City - A Successful Bus Network. How do we continue to grow?"

## 6.2. **Planning Authority Response**

None.

## 6.3. **Observations**

None.

## 7.0 **Assessment**

Having undertaken a site visit and having regard to the relevant policies pertaining to the subject site, the nature of existing uses on and in the vicinity of the site, the nature and scale of the proposed development and the nature of existing and permitted development in the immediate vicinity of the site, I consider that the main issues pertaining to the proposed development can be assessed under the following headings:

1. Principle of the development
2. Reasons for Refusal
3. Appropriate Assessment

### 7.1. **Principle of the development**

- 7.1.1. In submitting the appeal against the PAs decision to refuse permission, I note the submission that one of the outstanding site resolution issues associated with the unfinished estate is the regularisation of car parking. A refusal of planning permission will not resolve the parking requirement problem on the site, and it is noted that the majority of the permitted car parking spaces associated with the development, were permitted outside of the development site. The applicant does not and cannot obtain sufficient legal interest for the permitted parking spaces outside of his ownership. The current application seeks to provide for self-sufficient parking within the applicants’ boundary.

- 7.1.2. The Board will note that the most recent application relating to this site is PA ref. 13/322. Having inspected the previous applications relating to the subject site, I note that the parking to the front of apartment block E were included within the sites red boundary line. In addition, the other parking spaces located across from Block D and the Junior Play Area are identified on drawings submitted under PA Ref 13/322 as being implemented under a previous permission. In addition, and having undertaken a site visit, I would note that there appears to be amendments to the road layout in this area of the wider site.
- 7.1.3. The current applicant sought, and was granted permission for the retention, completion and omission of 44 partially constructed apartments previously approved under PA ref 05/508. This decision also included re-configured open space and car parking. The development was permitted based on the car parking layout as submitted at that time. Condition 10 of that grant of planning permission required that the proposed communal open spaces, car parking areas and access road within the site of the development to be retained in private ownership and control to be maintained by a properly constituted Management Company. In an effort to comply with this condition, on the 6<sup>th</sup> December 2019, the applicant submitted a letter indicating that a management company, Doughiska Property Management Company, with a registered office at 164 Fionnuisce, Doughiska, Galway was incorporated with responsibility for a number of areas. The PA concluded that the submission of a solicitors' letter does not meet the requirements of Condition 10 and requires that details of the Management Company Contract be submitted for agreement. It was noted that the development remains unfinished including all common areas and that the development was not being maintained.
- 7.1.4. Having regard to the location of the subject site within the outer suburb of Doughiska, to the east of Galway City, together with the R1 Residential zoning afforded to the site, I am generally satisfied that the principle of the development might be considered as being acceptable. However, having regard to the planning history of the site, including the wider Fionnuisce development, it is clear that the proposal would be contrary to conditions attached to previous grants of planning permission for the development. The applicant / appellants seeks to change the use of a permitted open space area, which includes a Senior Play Area, to provide additional car parking to service an apartment development. I also note that

permission has been refused in the past to construct residential units on an area of communal open space on the basis that it would contravene conditions of previous decisions associated with the overall site.

- 7.1.5. In the context of the permitted development, and the fact that the applicant does not own the lands which were submitted as part of the previous planning applications to provide for car parking to serve the development, I would question whether this of itself is an acceptable reason to release the developer from his requirements under conditions of a permitted development. I do accept that the description of the development does not seek such a release, but the proposal to construct car parking on communal open space runs contrary to said conditions. I note an extensive correspondence history, including enforcement, associated with the development and note that the subject development site is generally considered part of the wider Fionnuisce development. The apartment numbering follows from the wider development and indeed, the roads layout and open space provisions of the wider development facilitates and supports the subject appeal site.
- 7.1.6. Having undertaken a site inspection, I note that the area of the subject appeal – as delineated within the red line of the application – together with areas of road and permitted car parking area adjacent to Blocks E and D, appear to be the only areas of the wider development which remains unfinished. These areas are partially fenced off but remain accessible by foot and by vehicles. No area of communal open space has been completed, and car parking has not been delineated or roads surfaced. Of particular note, the permission granted, and executed, under 13/322 expired on the 10<sup>th</sup> February 2019. On the date of my inspection, I noted a significant number of cars parked within the fenced off area adjacent to Block E and it appears that a number of the apartments within the unfinished blocks are occupied. In this regard, the proposal to relocate the car parking provision for these apartments approximately 180m away is wholly inappropriate in my opinion. It would also appear that, given the scale of the overall development, parking is required at this location.
- 7.1.7. In terms of conditions attached to PA ref. 13/322, the following are considered relevant:

Condition 2: Development Contribution

Condition 3: Bond required until the taking in charge by the Council.

Condition 10: Requires a properly constituted Management Company to manage communal open spaces, car parking areas and access roads within the site.

It appears from the Galway City Council website that condition 2 was discharged on the 25<sup>th</sup> September 2020 and as such has been complied with. I could not find a compliance reference for Condition 3. Similarly, I could not find a compliance reference for Condition 10. Non-compliance with conditions are however a matter for the Planning Authority.

## 7.2. Reasons for Refusal:

- 7.2.1. **Reason for Refusal no. 1** relates to the loss of an area reserved under planning reference number 05/508 and planning reference number 13/322, as communal open space, for the benefit of existing and future residents. The proposed development would result in a significant reduction in quantum, quality and functionality of the existing amenity space, which would be detrimental to the residential amenity of existing and future residents. The applicant has sought to argue that the relocation of the parking spaces will enable areas within the remainder of the estate to remain as public open space, and that the provision within the subject site is in excess of the CDP requirements.
- 7.2.2. I would not accept the arguments as presented. The relocation of permitted car parking spaces as previously permitted will in no way compensate for the loss of the Senior Play Area given the fact that the permitted spaces are at various locations throughout the site, and are long and narrow comprising parking spaces. The sum of the parking areas may amount the proposed relocated area, but the usability and quality of these spaces as communal open space would be significantly lacking.
- 7.2.3. With regard to **Reason for Refusal no. 2**, the PA considered that as the proposal involves development on residential open space, identified under Table 4.2 Open Spaces within the Green Network of the City Development Plan, the development would contravene Policy 4.1 Green Network as provided for in the Plan. It is the stated policy of the Council to provide adequate recreation and amenity open space for the future development of the city, retain, extent and enhance opportunities for

recreation within the green network for all members of the community, and enhance linkages and connectivity within the green network.

- 7.2.4. In response, the applicant submits that the site is located outside the Green Network identified in the CDP. In addition, I would concur that the proposed development does not interfere with Merlin Park Woods. While I acknowledge the amended proposals submitted by the appellant in terms of alternatives to the original proposed car parking provision, I would however, not accept that as the area of Doughiska has a wealth of communal open spaces including parks, tennis courts etc approximately 650m to the east of the site, this justifies the proposed development and the loss of much needed amenity space for the permitted development in the vicinity of the site. A grant of planning permission in this instance, and the loss of the valuable amenity areas would be a significant impact on residential amenity for existing and future occupants of the development.
- 7.2.5. In terms of **Reason for Refusal no. 3**, the Board will note that the Planning Authority included a reason for refusal relating to the potential impact of the development on Merlin Park Woods, which is host to a number of protected species listed for protection under the EU Habitats Directive and the Wildlife Acts 1976-2000 and their key habitats. The Planning Authority considered that the proposed development would, therefore conflict with the policy of the Planning Authority and be contrary to the proper planning and sustainable development of the area. In response, the appellant submitted an Ecological Report / Opinion which concludes that 'it is not considered likely that the proposed development will have any significant effects on Merlin Park Woods'.
- 7.2.6. Having regard to the nature and minimal extent of the proposed development, I am inclined to agree with the appellant in this regard. I consider that the proposed development relates to an existing development with the intention to complete the permitted development subject to amendments proposed. I do not consider that the development gives rise to any potential impacts on any protected species listed for protection under the EU Habitats Directive and the Wildlife Acts 1976-2000 or their key habitats within Merlin Park Woods.
- 7.2.7. I also note that the closest Natura 2000 site is located approximately 1.4km to the south of the site. I have no objections to the proposed development in this regard.



### **7.3. Appropriate Assessment**

- 7.3.1. The site is not located within any designated site. The closest Natura 2000 site is the Galway Bay SAC (& pNHA)(Site Code: 000268) and the Inner Galway Bay SPA (Site Code: 004031) which is located approximately 1.4km to the south of the site.
- 7.3.2. Overall, I consider it is reasonable to conclude on the basis of the information available that the proposal individually or in combination with other plans or projects, would not adversely affect the integrity of a Natura 2000 site having regard to the nature and scale of the proposed development and separation distances involved to adjoining Natura 2000 sites. It is also not considered that the development would be likely to have a significant effect individually or in combination with other plans or projects on a European Site.

### **8.0 Recommendation**

I recommend that planning permission be refused for the proposed development for the following stated reason.

## 9.0 Reasons and Considerations

1. The area identified to relocate previously permitted car parking spaces comprises an area reserved under planning reference number 05/508 and planning reference number 13/322, Condition 4 refers, as communal open space, for the benefit of existing and future residents. The proposed development would result in a significant reduction in quantum, quality and functionality of the existing amenity space, which would be detrimental to the residential amenity of existing and future residents, contrary to Condition 4 of planning permission 13/322. The proposed development would, therefore, seriously injure existing residential amenities, would create an undesirable precedent for similar type development, contrary to the provisions of the Galway City Development Plan 2017-2023 and consequently, would be contrary to the proper planning and sustainable development of the area.

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A. Considine

Planning Inspector

15<sup>th</sup> February 2021