



An  
Bord  
Pleanála

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

### **Inspector's Report on Recommended Opinion ABP-308642-20**

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#### **Strategic Housing Development**

137 no. apartments / duplexes (6 no. studio, 52 no. 1 bed, 50 no. 2 bed and 29 no. 3 bed) in 6 no. blocks ranging in height from 3 to 8 storeys.

#### **Location**

Land North [sic] of Stocking Avenue, Woodtown, Ballycullen, Dublin 16.

#### **Planning Authority**

South Dublin County Council

#### **Prospective Applicant**

Ardstone Homes

#### **Date of Consultation Meeting**

8<sup>th</sup> February 2021

#### **Date of Site Inspection**

2<sup>nd</sup> February 2021

#### **Inspector**

Rachel Gleave O'Connor

## 1.0 Introduction

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

## 2.0 Site Location and Description

- 2.1. The site is located in the Woodtown area of Ballycullen, and south of Stocking Avenue, in the 'White Pines' development area. It is noted that the application form submitted for this pre-application consultation request identifies the site as being lands 'north' of Stocking Avenue, however the applicant has confirmed this to be an error, and the site is in fact 'Lands South of Stocking Avenue'.
- 2.2. The site is currently vacant and formed of greenfield area, with recently completed White Pines Housing estates to the south and north west. To the west of the site is a neighbourhood centre that is currently under construction.
- 2.3. The predominate character immediately surrounding the site is of 2 storey low rise residential housing and greenfield areas. Further to the west of the site development the character of the surroundings is increasingly urban, with a mix of self-contained housing and apartment blocks.

## 3.0 Proposed Strategic Housing Development

- 3.1. The proposed development involves 137 no. residential units as follows:

Unit Type	Number
Studios	6
1 bed	52

2 bed	50
3 bed	29
Total Apartments	70
Total Duplexes	67
Total Units	137

The development has a stated net residential density of c. 62.27 units/ha based on a development area of c. 2.2 ha. The development scheme comprises the following:

- The main vehicular access is proposed to/from White Pines Crescent and emergency vehicular access onto Stocking Avenue;
- Pedestrian/cycle access to/from Stocking Avenue and White Pines Crescent / White Pines Dales;
- 6 no. Blocks as follows: A – 8 storey apartment block, B, C1, C2, D and E – 3 storey duplex blocks;
- 296sqm of residential amenity space in the lower ground floor of Block A;
- Waste storage facilities;
- 125 no. surface car parking spaces;
- 224 no. cycle storage spaces;
- Boundary treatments and street lighting;
- 2 no. ESB substations, plant and switch rooms; and
- All associated site development works and services provision.

The applicant has confirmed the intention to submit an Environmental Impact Assessment Report with the application.

## 4.0 Planning History

4.1. SDCC Ref. SD04A/0393/ ABP Ref. PL06S.212191 - Cottages, Woodtown, Stocking Lane, Dublin 16

4.2. On lands comprising an area of approximately 22.97 ha (including part of the site subject of this pre-application).

4.3. Permission granted by SDCC for 10 year permission for development comprising residential, crèche, retail, office and public house use including *inter alia* 793 dwellings. There was a First Party Appeal against Conditions. APB granted with broadly similar conditions.

4.4. This permission was subject to additional amendment applications which relate to the individual sites as detailed in the submitted Planning Report.

### 4.5. Other relevant applications

4.6. SDCC Ref. SD19A/0345 - Lands south of Stocking Avenue, Woodtown, Dublin 16

4.7. Planning permission was granted in February 2020 for the construction of a neighbourhood centre comprising: a single storey convenience retail unit (c. 1,479sq.m GPA); a three storey building (c.577sq.m. GPA) comprising a creche at ground, first and second floor levels. The grant of permission omitted a community facility and extended the creche to the second floor level.

## 5.0 National and Local Planning Policy

### 5.1. Section 28 Ministerial Guidelines

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

- Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (including the associated Urban Design Manual)
- Design Standards for New Apartments Guidelines for Planning Authorities
- Design Manual for Urban Roads and Streets (DMURS)

- The Planning System and Flood Risk Management (including the associated Technical Appendices)
- Childcare Facilities Guidelines for Planning Authorities
- Urban Development and Building Heights Guidelines for Planning Authorities

## 5.2. **National Planning Framework**

- 5.3. The NPF seeks to achieve compact urban growth by targeting a greater proportion (40%) of future housing development to be within and close to the existing 'footprint' of built-up areas and plans for growth of 490,000 to 500,000 people in the Eastern and Midlands Region.
- 5.4. The National Planning Framework includes a specific Chapter, No. 6, entitled 'People Homes and Communities'. It includes 12 objectives among which Objective 27 seeks to ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments and integrating physical activity facilities for all ages.
- 5.5. Objective 33 seeks to prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.
- 5.6. Objective 35 seeks to increase densities in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.
- 5.7. **South Dublin County Development Plan 2016-2022**
- 5.7.1. Zoning: The site is zoned 'Objective RES-N – To provide for new residential communities in accordance with approved area plans' within the South Dublin County Development Plan 2016-2022. Residential use is permitted in principle.
- 5.8. General: Chapter 2 of the Plan outlines policies and objectives in relation to new housing and includes objectives relating to urban design, densities, building heights, mix of dwelling types and open space. In particular, section 2.2.2 of the South Dublin Development Plan sets out that densities should take account of the location of a site, the proposed mix of dwelling types and the availability of public transport

services. As a general principle, higher densities should be located within walking distance of town and district centres and high capacity public transport facilities. Policies H8 Objectives 1 and 2 promote higher densities at appropriate locations. Development Management Standards are included in Chapter 11.

The following policies are of particular relevance.

- Policy H6 Sustainable Communities – support development of sustainable communities and ensure new housing development is carried out in accordance with Government Policy in relation to housing and residential communities;
- Policy H7 Urban Design in Residential Developments – ensure new residential development within the County is of high quality design and complies with Government guidance on design of sustainable residential development;
- Policy H10 Mix of Dwelling types – ensure wide variety of housing types, sizes and tenures;
- Policy H8 – residential densities – promote higher densities at appropriate locations;
- Housing Policy 9 – residential building height – seeks to support varied building heights across residential and mixed use area.
  - H9 – Obj. 1 seeks to encourage varied building heights in new residential developments;
  - H9 Obj. 2 - To ensure that higher buildings in established areas respect the surrounding context.
  - H9 Obj. 3 - To ensure that new residential developments immediately adjoining existing one and two storey housing incorporate a gradual change in building heights with no significant marked increase in building height in close proximity to existing housing.
- Policy TM7 – Transport and Mobility – policy of Council to take a balanced approach to provision of car parking with aim of meeting the needs of businesses and communities whilst promoting a transition towards more sustainable forms of transportation. Number of supporting objectives (TM7 Obj.1) which seek to

carefully consider the number of parking spaces provided to service needs of new development.

### **Ballycullen – Oldcourt Local Area Plan, 2014 (as amended 2017)**

- 5.8.1. All of the proposal site is located within the boundary of the Ballycullen – Oldcourt Local Area Plan, 2014 (as amended 2017). In 2019 this LAP was extended and will now expire on 2nd June 2024.
- 5.8.2. The settlement strategy for the Ballycullen area is set out in Section 1 of the LAP and provides for the construction of approximately 1,600 additional dwellings (about 4,600 persons) at a range of densities appropriate to the area.
- 5.8.3. Section 6 of the Local Area Plan sets a Phasing Strategy. The Phasing Strategy only allows for the permissible quantum of development under each phase to commence construction after key outcomes have generally been achieved.
- 5.8.4. The LAP also sets out objectives in relation to *inter alia* design, densities, mix, residential standards including open space provision and the provision of community infrastructure. Objective BF8 relates to building height.

## **6.0 Forming of the Opinion**

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

### **6.2. Documentation Submitted**

- 6.2.1. The prospective applicant has submitted information pursuant to section 5(5)(a) of the Planning & Development (Housing) and Residential Tenancies Act 2016 and Article 285 of the Planning and Development (Strategic Housing Development) Regulations 2017. This information included, *inter alia*, the following:
  - Application Form for a Section 5 Pre-Application Consultation Request in respect of a Strategic Housing Development;
  - Cover letter and relevant fee;

- Part V Submission;
- Planning Report;
- Statement of Consistency;
- Material Contravention Statement;
- Architectural Design Statement;
- Housing Quality Assessment;
- Architectural Design Drawings;
- Landscape Design Report;
- Landscape Masterplan and Drawings;
- Traffic and Transport Assessment;
- Mobility Management Plan;
- Parking Strategy;
- Energy and Sustainability Report;
- Public Lighting Plans and Report;
- Building Life Cycle Report;
- Engineering Drawings;
- AA Screening Report;
- EIAR Report (18 Chapters and Appendices as following: Community Facility Audit, Childcare Facility Audit; School Needs Assessment; Sunlight, Daylight and Shadow Analysis; Preliminary Construction Management Plan; and Operational Waste Management Plan).

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



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

### **6.3. Planning Authority Submission**

6.3.1. In compliance with section 6(4)(b) of the 2016 Act the planning authority for the area in which the proposed development is located, South Dublin County Council, submitted a copy of their section 247 consultations with the prospective applicant and also their opinion in relation to the proposal. The planning authority's 'opinion' included the following matters:

- The site is zoned under objective 'RES-N' – 'To provide for New Residential Communities'. Under this zoning objective the use class 'Residential' is permitted in principle. All of the application site is located in the Ballycullen – Oldcourt Local Area Plan 2014 (extended to 2017).
- The proposed density of 62.27 units per hectare is not sustainable in the area, which is poorly served by public transport and not in close proximity to a major centre.
- The site is served by only one bus route, the 15B, which travels to the city centre but would take approximately one hour. The subject site is located on the periphery of the built environment of South Dublin County in the foothills of the Dublin Mountains, in an area that is difficult to service with public transport due to dependence on bridges across the M50 and the River Dodder for vehicular permeability.
- The Planning Authority does not support the density proposed as it would be unsustainable owing to car dependency and would not accord with proper planning and sustainable development.
- The Ballycullen-Oldcourt Local Area Plan requires 190sqm of Community Floorspace to be provided, before the commencement of Phase 2. The LAP has surpassed Phase 2, in terms of unit numbers. There is 0sqm of Community Floorspace provided to date. Notwithstanding this, SDCC are in initial discussions with the applicant regarding the provision of a large community centre in the White Pines East development to the north east of the subject site. It is envisaged that this centre will have capacity to cater for the wider LAP area.

- Objective G130 of the LAP concerns green buffers to the Mountains and M50 and states that buffers shall be no less than 15m in width.
- The Childcare Demand Assessment undertaken by the applicant was carried out in January and February 2020 and significant changes have occurred since then with regard to childcare.
- Objective BF8 of the LAP sets a limit of no more than three storeys on the Lower Slope Lands, two storeys on the mid slope lands and one storey on the upper slope lands.
- The heights proposed, and in particular the eight-storey element, are considered to be a significant concern and a material contravention of the LAP.
- The topography of the site will result in buildings that read as taller than 3 storeys in height when viewed from the surrounding area.
- The proposal would consist of a total of 137 units made up solely of apartments which would be contrary to the requirements of Objective LUD3 of the LAP which requires a minimum of 90% or more houses.
- The applicant has not stated within their submission whether the units would be for private sale or the rental market.
- It is noted that school provision in the area was planned based on the LAP densities and the widespread increasing of residential densities will provide additional demand.
- The subject proposal significantly deviates from the LAP indicative layout for the development of the area.
- Notwithstanding the concerns with density and building height, in general terms the proposed buildings are considered to be well designed. More information on the use of retaining walls should be provided to include detailed sectioned drawings.
- The overall site appears to be a bit cramped in terms of layout, and in particular the eight-storey block which has little set back from the street. Given the concerns with density, it would appear that a reduced number of buildings would provide a less cramped feel. There are also concerns with the relationship

between Block D and Block E as residents in Block E would effectively be looking out at the gable wall of Block D. Proximity to the eastern boundary is also a concern.

- The applicant is encouraged to provide more views from the west and south-west of the site and in particular from the White Pines South development and the Stocking Wood estates. Views should be in both winter and summer months.
- Separation distances should be annotated on plans and an indicative layout of White Pines East should be included.
- Apartment sizes and proportion of dual aspect units comply with standards. Single aspect north units should be highlighted on plans.
- Concerns regarding siting of public open space underneath power lines. Given the topography of the site, the applicant is encouraged to provide more details of those areas forming public open space to demonstrate usability.
- The secondary emergency access onto Stocking Avenue is currently designed at 3.8m wide and has a very twisty alignment. This road should be 5.5m wide with a minimum bend radii of 6.0m. Roads do not recommend any retaining walls within the development.
- Road Department are satisfied with the parking allocation of 125 at this development. Request that parking bays be 5.0m x 2.5m to assist access and egress from bays. 5 mobility impaired spaces are required and a minimum of 10% should be electric charging spaces. Satisfied with cycle parking provision, external storage should be covered.
- Note the removal of 1 tree and 90m of hedgerow which will have ecosystem, biodiversity and green infrastructure impact.
- Additional natural SUDs features should be incorporated into the proposed drainage system for the development.
- Biodiversity Management Plan requested.
- Insufficient provision for play and no provision for teenagers in the proposed landscape.

- The applicant proposes to provide surface water attenuation for Catchment C1 an existing surface water attenuation system west of the subject site. Initial surface water attenuation assessment carried out by South Dublin County Council indicates that this attenuation tank is currently at full capacity for the 1 in 100 year rainfall event.
- Inconsistencies in the submitted Flood Risk Assessment noted.
- The Planning Authority's considers that the proposed development would not accord with proper planning and sustainable development, and that the proposed heights and density should be reduced to a level closer to the Local Area Plan, which, although it preceded more recent national guidelines, reflects the most appropriate use of per-urban development lands with a level of access to local amenities and public transport that does not justify high density development. This site is not located in the centre of Tallaght Town Centre, but is located at the foothills of the Dublin Mountains and any future development should be reflective of the location.

### **Irish Water**

- 6.3.2. The submission from Irish Water (dated 17<sup>th</sup> December 2020) states that a Confirmation of Feasibility has been issued for a development of 195 units on the site subject to the following:
- 6.3.3. Water: New connection to the existing network is feasible without upgrade(s) however, the assessment does not extend to the applicant's fire flow requirements for which they are required to provide adequate fire storage capacity within the development.
- 6.3.4. The connection from the trunk main should include installation of an offtake with a PRV controller and a bulk/DMA meter with associated telemetry system. The offtake design should take into account other potential developments in the area. Full details of this will be agreed at a connection application stage.
- 6.3.5. Wastewater: In order to accommodate the proposed connection at the Premises, upgrade works are required to increase the capacity of the Irish Water network. Irish Water currently has a project which will provide the necessary upgrade and capacity and is scheduled to be completed by 2022 (subject to change). A separate network

extension of approximately 520m is also required from the upgraded wastewater network to the development site and proposed premises. The applicant will be required to fund these local upgrades and will be responsible for any 3<sup>rd</sup> party consents required.

#### **6.4. Consultation Meeting**

- 6.4.1. A section 5 Consultation meeting took place via a video conference on the 8<sup>th</sup> February 2021. Representatives of the prospective applicant, the planning authority and An Bord Pleanála were in attendance. An agenda was issued by An Bord Pleanála prior to the meeting.
- 6.4.2. The main topics raised for discussion at the tripartite meeting were based on the Agenda that issued in advance and contained the following issues:
1. Density and tenure;
  2. Design – building height rationale, site layout / landscape design and use of retaining walls;
  3. Access and surface car parking;
  4. Phasing;
  5. Childcare demand;
  6. Drainage and water supply; and
  7. Any Other Matters.
- 6.4.3. Both the prospective applicant and the planning authority were given an opportunity to comment and respond to the issues raised by the representatives of ABP. Those comments and responses are recorded in the ‘Record of Meeting ABP-308642-20’ which is on file. I have fully considered the responses and comments of the prospective applicant and planning authority in preparing the Recommended Opinion hereunder.

#### **7.0 Conclusion and Recommendation**

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

- 7.2. I have examined all of the information and submissions before me including the documentation submitted by the prospective applicant, the submissions of the planning authority and the discussions which took place at the tripartite meeting. I have had regard to both national policy, via the section 28 Ministerial Guidelines, and local policy, via the statutory development plan for the area.
- 7.3. Having regard to all of the above, I recommend that the Board serve a notice on the prospective applicant, pursuant to Section 6(7)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016, stating that it is of the opinion that the documentation submitted with the consultation request under section 5(5) of the Act requires **further consideration and amendment in order to constitute a reasonable basis for an application** under section 4 of the Planning and Development (Housing) and Residential Tenancies Act 2016.
- 7.4. I would also recommend that the prospective applicant be notified, pursuant to article 285(5)(b) of the 2017 Regulations, that specified information (as outlined hereunder) be submitted with any application for permission that may follow. I believe the specified information will assist the Board at application stage in its decision making process. I am also recommending that a number of prescribed bodies (as listed hereunder) be notified by the prospective applicant of the making of the application.

## 8.0 Recommended Opinion

- 8.1. An Bord Pleanála refers to your request pursuant to section 5 of the Planning and Development (Housing) and Residential Tenancies Act 2016. Section 6(7)(a) of the Act provides that the Board shall form an opinion as to whether the documents submitted with the consultation request (i) constitute a reasonable basis for an application under section 4 of the Act, or (ii) require further consideration and amendment in order to constitute a reasonable basis for an application under section 4.
- 8.2. Following consideration of the issues raised during the consultation process, and having regard to the opinion of the planning authority, An Bord Pleanála is of the opinion that the documentation submitted requires **further consideration and amendment to constitute a reasonable basis for an application** for strategic housing development to An Bord Pleanála.

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

1. Design Strategy

Further consideration of the documents as they relate to the design and layout of the proposed development is required. Consideration is required as to how the proposed design has been influenced by the best practice design principles of the 'Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (including the associated Urban Design Manual)' and criteria within the 'Urban Development and Building Heights - Guidelines for Planning Authorities', particularly in relation to addressing the street, contribution to the urban neighbourhood and streetscape, and the quality of detailed building design / material use. Further consideration of the principles or criteria described under these guidance documents may require amendment to the design proposals submitted. As part of this, further consideration is also required of the aesthetic impact of surface level car parking, and whether there is potential for an alternative car parking arrangement in the development. Photomontages, CGIs and a Landscape Visual Impact Assessment alongside verified views, will be required to accurately illustrate the appearance of the proposed development.

8.4. **Specific Information**

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

1. Additional details relating to compliance, or otherwise, with site specific requirements, phasing requirements and other relevant objectives as set out in the Ballycullen – Oldcourt Local Area Plan, 2014 (as amended 2017) and the South Dublin County Council Development Plan 2016-2022. The prospective applicant should satisfy themselves in relation to whether the proposed development represents a material contravention of the Local Area Plan and/or

Development Plan and satisfy the subsequent submission requirements in relation to this.

2. Topographical survey of the site and associated commentary on how this has impacted the design of the proposed development. As well as associated details and cross section drawings of any proposed retaining walls. Any potential resultant impacts from site excavation should also be given comprehensive consideration.
3. A plan showing separation distances between the development to existing adjacent properties should also be included, annotating key distances to boundaries, buildings and windows.
4. Additional details and/or revised proposals in relation to the proximity of the development to the south east boundary, and related potential impact upon the future development potential of adjacent lands.
5. Additional details and/or revised proposals in relation to the quality of ground floor uses, entrance details and access to cycle storage, within Block A.
6. Additional details and/or revised proposals in relation to the proposed material palette for the proposed development. Details shall be described in a building life cycle report in accordance with section 6.3 of the 'Sustainable Urban housing: Design Standards for New Apartments (2018)'. Details should include the proposed materials and finishes of buildings, landscaped areas and any screening/boundary treatment. Particular regard should be had to the requirement to provide high quality and sustainable finishes and details which seek to create a distinct character for the development.
7. A Housing Quality Assessment with regard to relevant national and local planning policy on residential development. Those windows considered to have a dual aspect should be clearly indicated. In relation to single aspect north-facing units, reference should be had to paragraph 3.18 of the 2018 Apartment Guidelines. All documentation should be cross referenced to ensure reference to the correct number of units and breakdown of unit type.



8. Submission of a comprehensive Daylight, Sunlight and Overshadowing Assessment providing analysis of both the proposed accommodation and any potential impact upon surrounding dwellings/amenity spaces. Analysis should consider whether all windows/rooms on the lower floor level meet target BRE values, before any assumption on the results for upper floor levels is made.
9. Proposals for appropriate mitigation of tree/hedge removal should be considered.
10. Additional details and/or revised proposals in relation to landscape design having regard to comments from the Planning Authority. A plan of landscape proposals clearly delineating communal and private spaces should be provided, as well as a detailed breakdown of the total area of same. Consideration of how the design of the landscape and provision of furniture/equipment will facilitate use of these spaces for both adults and children is also required.
11. Additional details and/or revised proposals in relation to attenuation/SUDs, Flood Risk, and any other matters raised by the Drainage and Water Supply Section of the Planning Authority.
12. Additional details and/or revised proposals in relation to access arrangements, and any other matters raised by the Roads Department of the Planning Authority.
13. The Childcare Demand Assessment should reflect the most current data available at the time of submission in relation to surrounding existing childcare provision; Or describe the proposed solution for meeting childcare demand generated by the development, alongside cumulative demand within the White Pines development area.

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

1. The Department of Culture, Heritage and the Gaeltacht
2. The Heritage Council

3. An Taisce
4. Irish Water
5. Transport Infrastructure Ireland
6. National Transport Authority
7. South Dublin Childcare Committee

**PLEASE NOTE:**

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

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Rachel Gleave O'Connor

Planning Inspector

22nd February 2021