



An  
Bord  
Pleanála

## Inspector's Report 310543-21

### Development

The proposed development consists of: Subdivision of the property into 2 No. 3-bed apartments, one at Ground Floor Level and a second at First and Attic Floor Levels; Construction of a 2-storey pitched roof side extension, single storey flat roof extension to the rear with a rooftop terrace, and dormer roof extension to the rear; Associated elevations alterations and internal alterations to the existing property including conversion of the Attic Level to habitable accommodation; and all associated site works to facilitate the development.

### Location

159 North Circular Road (siding onto Ellesmere Avenue), Dublin 7

### Planning Authority

Dublin City Council

### Planning Authority Reg. Ref.

2482/21

### Applicant(s)

Patrick Simons

### Type of Application

Permission

### Planning Authority Decision

Grant Permission

<b>Type of Appeal</b>	Third Party Appeal
<b>Appellant(s)</b>	Eileen Lynch
<b>Observer(s)</b>	None
<b>Date of Site Inspection</b>	9 <sup>th</sup> August 2021
<b>Inspector</b>	Susan Clarke

## **1.0 Site Location and Description**

- 1.1. The site is located at 159 North Circular Road (siding onto Ellesmere Avenue) Dublin 7 and has a stated area of 331.76 sq m. The site is an existing end-of-terrace period dwelling located in a predominately residential area. Whilst the property is not a Protected Structure, a number of such structures are located in the vicinity of the site.
- 1.2. The existing property is a 2-storey dwelling (4 No. bedrooms) and has a front and rear garden. The front garden provides for pedestrian access only, while the rear garden provides amenity space and off-street car parking, which is accessed off Ellesmere Avenue. The site also comprises of a narrow side garden along Ellesmere Avenue.

## **2.0 Proposed Development**

2.1.1. The proposed development consists of:

- Subdivision of the property into 2 No. 3-bed apartments, one at Ground Floor Level (101.02 sq m) and a second at First and Attic Floor Levels (128.48 sq m);
- Construction of a 2-storey pitched roof side extension (33.98 sq m), single storey flat roof extension to the rear with a rooftop terrace (17.54 sq m), and dormer roof extension to the rear (27.7 sq m);
- Associated elevations alterations including the provision of velux roof windows to the front and side elevations;
- Associated internal alterations to the existing property including conversion of the Attic Level to habitable accommodation; and
- All associated site works to facilitate the development.

The proposed development will result in an increase of gross floor area by 74.64 sq m, from 154.86 sq m to 229.50 sq m.

## **3.0 Planning Authority Decision**

### **3.1. Decision**

- 3.1.1. Planning permission granted subject to 14 No. conditions issued on 20<sup>th</sup> May 2021.

3.1.2. Condition No. 5 states the following:

“The development hereby approved shall be amended as follows:

(a) The first floor terrace proposed at first floor level and associated screening devices and access doors from adjoining apartment shall be permanently omitted from the development and the access doors shall be omitted and replaced with a standard window that is no more than 2m wide and 1.5m high.

(b) Access to the first floor roof shall only be permitted for necessary maintenance of the roof or windows. For the avoidance of doubt, the first floor roof shall not be used for amenity purposes without a separate grant of permission.

(c) The proposed rear dormer shall be reduced in width to a maximum of 4 metres (as measured externally).

(d) The proposed rooflights to the front elevation shall be of conservation type, with a low profile. Details shall be submitted to, and agreed in writing with, the planning authority prior to the commencement of development.

Reason: To protect the residential amenities of adjoining residential properties and to protect the visual amenities of the area.”

## **3.2. Planning Authority Reports**

### **3.2.1. Planning Reports**

#### **3.2.2. Basis of Planning Authority’s decision.**

3.2.3. The Planning Officer considered that the proposed development was acceptable in principle and that it appropriately addressed the three reasons for refusal relating to a recently proposed similar type development (subdivision of the property and provision of three apartments - Reg. Ref. 2490/20) on the site. Unlike the recent Refusal, overdevelopment of the site was not considered to be an issue with the current proposal.

3.2.4. The Planning Officer noted concerns with respect to the First Floor roof terrace and recommended that this area not be used for amenity purposes as set out under Condition No. 5 of the permission. Furthermore, the Planning Officer recommended that the dormer roof extension be reduced in size.

3.2.5. The Planning Officer was satisfied that the proposed development complied with all relevant residential design standards.

3.2.6. **Other Technical Reports**

Transportation Planning Division: No objection subject to conditions.

Engineering Department Drainage Division: No objection subject to conditions.

3.3. **Prescribed Bodies**

Irish Rail: None received.

Irish Water: None received.

3.4. **Third Party Observations**

Two Third Party observations were made in respect of the application:

- 1) Ms Eileen Lynch of No. 5 Ellesmere Avenue, North Circular Road, Dublin 7;  
and
- 2) Ellesmere & Adjoining Avenues Residents Association and North Circular Road and Area Residents Group.

3.5. My Lynch's observations are set out in the Third-Party Appeal. See Section 6 below.

3.6. The Resident's Associations' points can be summarised as follows:

- The physical works proposed are very similar to Reg. Ref. 2490/20 and as such the comments made in respect of the Refusal are applicable to the current proposal.
- The increase in the rear return roof height will seriously diminish daylight to the adjoining No. 161 North Circular Road (NCR).
- The proposed external works have no design ethos and are a consequence of overdevelopment. The dormer attic rear windows treatment/size and scale is excessive. The dormer significantly intrudes and impacts on Ellesmere Avenue. The western elevation is a lost design opportunity.
- The site is insufficient in size to accommodate the proposed development, including the provision of three car parking spaces and adequate private open space.
- The roof terrace would seriously injure the residential amenity of adjoining residents by reason of nuisance, visual ugliness, excessive noise, disturbance,

overlooking and potential anti-social behaviour, which is contrary to the site's zoning objective.

## 4.0 Planning History

- 4.1. **Planning Authority Reg. Ref. 2490/20:** Planning permission refused on 2<sup>nd</sup> July 2020 for subdivision and extension to existing property to provide for three apartments. Three reasons for refusal related to 1) overdevelopment, 2) substandard private open space, and 3) overlooking of adjoining property and potential noise and disturbance from the external terrace. The Refusal was not appealed to An Bord Pleanála.
- 4.2. **Section 96 Social Housing Exemption Certificate Reg. Ref. 0132/20:** A Social Housing Exemption Certificate was issued by Dublin City Council in respect of the proposal on 26<sup>th</sup> March 2020.

## 5.0 Policy and Context

### 5.1. National Planning Guidelines

The following planning guidance documents are relevant:

- Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities (2020); and
- Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (including the associated Urban Design Manual) (2009).

The 2020 Apartment Guidelines contain the applicable residential development management standards for the proposed 3-bedroom apartments including *inter alia*:

- Minimum Overall Floor Area = 90 sq m
- Private Open Space = 9 sq m
- Minimum Bedroom Size = 11.4 + 13 + 7.1 sq m = 31.5 sq m

## **5.2. Dublin City Development Plan 2016-2022**

### **5.3. Land Use Zoning**

- 5.3.1. The site is subject to land use zoning “Z1” (Sustainable Residential Neighbourhoods) which has the objective “to protect, provide and improve residential amenities”. Within Z1 zones ‘Residential’ is a permissible use.
- 5.3.2. Section 16.10.13 of the CDP refers to the Sub-division of Dwellings. The CDP states that the sub-division of large dwelling houses may be permitted in highly accessible areas to provide for the demographic changes in the city, subject to the residential amenity standards set out in Chapter 16, including minimum floor space, etc. Where sub-division is being considered, factors such as the extent of open space within the site boundaries, landscaping schemes including the retention and planting of trees, the provision of on-site parking, the retention of existing railings and gates, and screened refuse storage areas will be evaluated as part of the assessment. When sub-divisions are allowed, they should be compatible with the architectural character of the building. An appropriate mix of accommodation in particular areas will be determined by the Planning Authority, taking account of the mix of residential accommodation in an area. The Local Authority may accept parking provision of less than one space per dwelling unit to encourage occupation of the dwellings by households owning fewer cars.
- 5.3.3. Chapter 16 includes the Development Management Standards and has regard to Design, Layout, Mix of Uses and Sustainable Design. Table 16.2 the Cycle Parking Standards. Applicable to the proposed development are the following:
- Indicative plot ratio for Z1 zones is 0.5 to 2.0.
  - Indicative site coverage for the Z1 zone is 45-60%.
- 5.3.4. Section 16.2.2.3 of the CDP refers to Alterations and Extensions. This Section states that the Local Authority will seek to ensure that alterations and extensions will be sensitively designed and detailed to respect the character of the existing building, its context and the amenity of adjoining occupiers. In particular, alterations and extensions should:
- Respect any existing uniformity of the street, together with significant patterns, rhythms or groupings of buildings

- Retain a significant proportion of the garden space, yard or other enclosure
- Not result in the loss of, obscure or otherwise detract from architectural features which contribute to the quality of the existing building
- Retain characteristic townscape spaces or gaps between buildings
- Not involve the infilling, enclosure or harmful alteration of front lightwells.

Section 16.2.2.3 also states that extensions should be confined to the rear in most cases, be clearly subordinate to the existing building in scale and design and incorporate a high standard of thermal performance and appropriate sustainable design features.

5.3.5. Further guidance in relation to dormer extensions is set out in Section 17.11 of Appendix 17. When extending the roof, the following principles should be applied:

- The design of the dormer should reflect the character of the area, the surrounding buildings and the age and appearance of the existing building;
- Dormer windows should be visually subordinate to the roof slope, enabling a large proportion of the original roof to remain visible;
- Any new window should relate to the shape, size, position and design of the existing doors and windows on the lower floors;
- Roof materials should be covered in materials that match or complement the main building;
- Dormer windows should be set back from the eaves level to minimise their visual impact and reduce the potential for overlooking of adjoining properties.

Section 11.1.1 of the CDP refers to Build Heritage. The CDP states that the built heritage contributes significantly to the city's identity, to the collective memory of its communities and to the richness and diversity of its urban fabric.

#### **5.4. Natural Heritage Designations**

None.



## **6.0 The Appeal**

### **6.1. Grounds of Appeal**

6.1.1. A Third-Party Appeal has been lodged by Ms Eileen Lynch of No. 5 Ellesmere Avenue, North Circular Road, Dublin 7. The grounds of appeal can be summarised as follows:

- The subdivision of the single unit family dwelling would be a change in the traditional use of the house and be out of character with the ethos of the area and as such would be contrary to the proper planning and sustainable development of the area. The nature of the alterations would not allow for a possible return to its original family use.
- The proposed development would result in an overdevelopment of the site.
- The architectural design of the extension onto Ellesmere Avenue is extremely poor quality. Extension to the front of the house would create a physical change to the symmetrical architecture of the terrace and is not in the spirit of Section 11.1.1 of the CDP. The façade is an insult to an area of Edwardian architecture.
- The proposal would create a physical change to both the NCR and Ellesmere Avenue. The Council gave insufficient consideration to the adverse impact from the development on the existing character of the entrance to Ellesmere Avenue.
- Planning permission has not been sought for the removal of the side garden or the demolition of the 19<sup>th</sup> century boundary wall.
- The entry/exit doorway onto Ellesmere Avenue cannot be regarded as being on the NCR and requires a new and separate planning application.
- The proposed development, in particular the extension to Ellesmere Avenue, would damage the residential and visual integrity of the area and therefore would adversely impact NCR and Ellesmere Avenue. This extension and roof terrace is strongly opposed by local residents.

### **6.2. Planning Authority Response**

None.

### 6.3. Observations

A First Party Response to Third Party Appeal was received on 14<sup>th</sup> July 2021. The Response provides a rebuttal to each of the points made by the Appellant. The points can be summarised as follows:

- The existing property would not be considered large by today's standards. The site is uniquely positioned to accommodate the proposed development due to the side and rear gardens. The remaining houses within the terrace will not be able to increase their floor areas in a similar manner and as such will remain in single occupancy. The proposal is in keeping with the accommodation requirements of the area.
- The proposed development complies with development management standards and as such overdevelopment is not considered applicable.
- The proposed extensions are designed to maintain the character of the area and will complement the front elevations and streetscape on NCR.
- The side garden will be retained and replanted when the works are complete. The only alteration proposed to the garden will be the introduction of a new apartment entrance door.
- The side elevation of the two storey extension will be completed using brick to match the existing red-brick property and therefore it is not considered that the extension will have any effect on the entrance to Ellesmere Avenue.
- The proposed design of the Ground Floor windows within the side elevation of No. 159 NCR have been carefully considered within the design of and function of the building.
- Subject to permission being granted for the development, it is proposed to number the apartments 159 and 159A North Circular Road as they share front side and rear elevations throughout.
- The reasons for refusal attached to Reg. Ref. 6436/06 (No. 76 Ellesmere Avenue) are not relevant as the development management standards that were applicable at the time of decision are now not applicable.

- Requests that the Board consider removing Condition No. 5(a) and 5(b) having regard to pre-planning discussions with the Planning Authority.

#### **6.4. Further Responses**

None.

### **7.0 Assessment**

Having examined the application details and all other documentation on file, including all of the submissions received in relation to the planning application and Third-Party Appeal, and inspection of the site, and having regard to relevant local/regional/policies and guidance, I consider that the main issues on this appeal are as follows:

1. Subdivision of Existing Property
2. Overdevelopment and Proposed Architectural Treatment
3. Residential Amenity
4. Retention of Side Garden and Proposed Entrance onto Ellesmere Avenue; and
5. Appropriate Assessment.

#### **7.1. Subdivision of Existing Property**

- 7.1.1. The proposed development includes for the subdivision of a two storey dwelling into 2 No. 3-bed apartments. The Appellant argues that the proposal would be a change in the traditional use of the house and would be out of character with the ethos of the area. The CDP (Section 16.10.13) supports such development in highly accessible areas to provide for demographic changes subject to residential amenity standards. I note that the site is zoned Z1 and 'Residential' is a permissible use. Having regard to the site's location in an inner suburban area with good access to the City centre, in my opinion the proposed subdivision of the property is acceptable in principle.

## 7.2. Overdevelopment and Proposed Architectural Treatment

7.2.1. The Appellant and earlier submissions made in respect of the application contend that the proposed development would result in overdevelopment of the site. As outlined above, the applicable CDP plot ratio and site coverage standards for the site are 0.5 to 2.0 and 45%-60%, respectively. The development will result in a plot ratio of 0.69 and site coverage of 38.52%. Furthermore, the proposed development exceeds with the applicable residential design standards as per the 2020 Apartment Guidelines including *inter alia*:

- Required Minimum Overall Floor Area = 90 sq m/ Proposed Floor Area = 101.42 sq m and 128.48 sq m, respectively.
- Required Private Open Space = 9 sq m/ Proposed Area = 25.2 sq m and 18.5 sq m, respectively.
- Required Minimum Bedroom Size = 11.4 + 13 + 7.1 sq m = 31.5 sq m/ Proposed = 15.4 + 15.2 + 9.3 sq m and 13.5 + 16.4 + 16.8 sq m, respectively.

As such in terms of quantitative development management standards, the proposed development would not be considered as overdevelopment.

7.2.2. In terms of the overall scale and architectural treatment of development, I do not consider the proposal excessive for the site or surrounding area. The property is not a Protected Structure, nor does it immediately abut such Structures. Furthermore, the area is not an Architectural Conservation Area. The ridge height of the existing property will not be breached by the proposed extensions, including the proposed dormer roof extension. I do not consider that the dormer roof extension is excessive and as such in my opinion Condition No. 5(c) attached to the Council's decision is not warranted. There was no First Party Appeal made by the Applicant in respect of Condition 5(c) nor did the Applicant request that this Condition be removed in the First Party Response to a Third Party Appeal. The Board may wish to give detailed consideration to this matter.

Whilst the proposed material detail is not outlined on the planning drawings, provided the materials are similar to that of the existing property, they will be in keeping with the character of the area and not cause any adverse visual impacts. I do not consider that the proposed development conflicts with Section 11.1.1 of the CDP. Should the Board

be minded to grant permission for the proposal, a condition requiring the materials to be agreed with the Planning Authority could be attached to a positive decision.

### **7.3. Residential Amenity**

- 7.3.1. Concern was expressed by the Appellant and the Residents Association in relation to the proposed First Floor roof terrace. It is argued that this space would cause overlooking and result in noise, potential anti-social behaviour, and disturbance to surrounding residents. The Council conditioned (No. 5b) that this space not be used for amenity purposes and as such the upper level 3-bed apartment would not benefit from any private open space. Whilst the 2020 Apartment Guidelines make provision for such measures, in my opinion this Condition would unnecessarily reduce the residential amenity of the subject apartment. The roof terrace is appropriately screened to ensure no overlooking of the Ground Floor Level patio. Furthermore, the terrace is appropriately setback from No. 157 NCR and No. 76 Everton Avenue to ensure there is no significant overlooking. Contrary to the Appellant and Residents Association points, in my opinion, this space could enliven the street corner. I do not foresee any reason why this space would cause nuisance or disturbance that would reduce the area's residential amenity in comparison to any other private open space, including the patio areas proposed for the Ground Floor Level apartment. Whilst there was no First Party Appeal made by the Applicant in respect of Condition 5(a) and 5(b), the Applicant has requested that the Conditions be removed in the First Party Response to Third Party Appeal. The Board may wish to consider this matter in detail. Should the Board be minded to grant permission for the development, the screening details for the roof terrace could be agreed with the Planning Authority.
- 7.3.2. The kitchen for the upper level apartment includes French patio doors and four windows. The north-west window overlooks the Ground Floor Level patio. It is recommended that this window be conditioned to be glazed with obscure glass to ensure no potential overlooking or reduced residential amenity for the Ground Floor level apartment. In terms of the windows along the north-east elevation of the kitchen, they are setback approximately 2.375m from the boundary wall. Furthermore, it is noted that the rear extension to No. 161 NCR is also setback a similar distance (approx. 2.3 m). I note from my site visit that the north-west elevation of the rear return

to No. 161 NCR has windows at First Floor Level facing onto the subject site. I contend that the distance (circa. 4.675m) between the two rear returns is sufficient to ensure no significant overlooking.

- 7.3.3. In relation to the Residents Association's points regarding diminished daylight to No. 161 NCR, in my opinion having regard to the orientation of the site and the existing two storey rear extension, the proposal will not alter the quantum of daylight to such a significant degree that would adversely affect amenities enjoyed by the occupants of neighbouring dwelling.

#### **7.4. Retention of Side Garden and Proposed Entrance onto Ellesmere Avenue**

- 7.4.1. The Appellant states that planning permission has not been sought for the removal of the side garden or the demolition of the 19<sup>th</sup> century boundary wall on Ellesmere Avenue. The subject side garden and boundary wall are both illustrated on the 'Survey Drawing: Existing Plans, Elevations & Site Block Plan' (Dwg. S.01, Rev. A) and the 'Planning No. 2 Drawing: Proposed Site Block Plan/Drainage Layout' (Dwg. P.07, Rev. B) and 'Planning No. 2 Drawing Proposed Ground & First Floor Plans' (Dwg. No. P.02, Rev. B). This area is shown to be fully within the red line boundary and ownership of the Applicant on the Site Location Map (Dwg. No. OS.01). No right-of-way or wayleave are illustrated on the Map. Furthermore, the First Party Response to Third Party Appeal states that the side garden will be retained and replanted when the works are complete. I note from my site visit that whilst this side garden is slightly overgrown, it positively contributes to the wider area's visual amenity and I welcome its retention as part of the proposed development.
- 7.4.2. The Appellant argues that the entry/exit doorway onto Ellesmere Avenue cannot be regarded as being on the NCR and requires a new and separate planning application. The planning application was appropriately advertised via the statutory notices, including the site address, to adequately notify members of the public of the proposed development and its location. I note also that the Planning Authority considered the planning application acceptable. I do not consider this matter a point for refusal.

## 7.5. Appropriate Assessment

Having regard to the nature and scale of the proposed development, the residential land use zoning of the site, and its location relative to Natura 2000 sites, no appropriate assessment issues arise and it is not considered that the development would be likely to have a significant effect, either individually or in combination with other plans or projects, on a European site.

## 8.0 Recommendation

I recommend that planning permission be granted, subject to the conditions outlined below.

## 9.0 Reasons and Considerations

Having regard to the location of the proposed development on the inner suburban area, the site's residential land use zoning, and the nature and scale of the proposed development, it is considered that subject to the compliance with the conditions set out below, that the development would not result in overdevelopment nor adversely injure the residential or visual amenities of the area or of the property in the vicinity. The proposed development would therefore be in accordance with the proper planning and sustainable development of the area.

## 10.0 Conditions

1.	<p>The development shall be carried out and completed in accordance with the plans and particulars lodged with the application, except as may otherwise be required in order to comply with the following conditions. Where such conditions require details to be agreed with the planning authority, the developer shall agree such details in writing with the planning authority prior to commencement of development and the development shall be carried out and completed in accordance with the agreed particulars.</p> <p><b>Reason:</b> In the interest of clarity.</p>
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2.	<p>The external finishes of the proposed extension shall be the same as those of the existing dwelling in respect of colour and texture. Details of all the proposed materials, including those to screen the First Floor roof terrace and the Velux roof windows, shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.</p> <p><b>Reason:</b> In the interest of visual amenity.</p>
3.	<p>The window in the kitchen on the north-west elevation at First Floor Level shall be glazed with obscure glass.</p> <p><b>Reason:</b> To prevent overlooking of adjoining residential property.</p>
4.	<p>A comprehensive boundary treatment and landscaping scheme shall be submitted to and agreed in writing with the planning authority, prior to commencement of development. This scheme shall include the retention of the side garden along Ellesmere Avenue and the boundary treatments for the vehicular and pedestrian access to the rear of the site along Ellesmere Avenue.</p> <p>Any plants which die, are removed or become seriously damaged or diseased, within a period of five years from the completion of the development, shall be replaced within the next planting season with others of similar size and species, unless otherwise agreed in writing with the planning authority.</p> <p><b>Reason:</b> In the interest of visual amenity.</p>
5.	<p>Water supply and drainage arrangements, including the disposal of surface water, shall comply with the requirements of the planning authority for such works and services.</p> <p><b>Reason:</b> In the interest of public health.</p>
6.	<p>Notwithstanding the exempted development provisions of the Planning and Development Regulations, 2001, and any statutory provision replacing or amending them, no development falling within Class 1 or Class 3 of Schedule</p>



	<p>2, Part 1 of those Regulations shall take place within the curtilage of the house without a prior grant of planning permission.</p> <p><b>Reason:</b> In the interest of the amenities of the area.</p>
7.	<p>Site development and building works shall be carried out only between the hours of 0700 to 1800 Mondays to Fridays inclusive, 0800 to 1400 on Saturdays and not at all on Sundays and public holidays. Deviation from these times will only be allowed in exceptional circumstances where prior written approval has been received from the planning authority.</p> <p><b>Reason:</b> In order to safeguard the residential amenities of property in the vicinity.</p>
8.	<p>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.</p> <p><b>Reason:</b> 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.</p>
9.	<p>The developer shall pay to the planning authority a financial contribution in respect of Luas Cross City Scheme in accordance with the terms of the Supplementary Development Contribution Scheme made by the planning</p>

authority under section 49 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 Supplementary Development Contribution Scheme made under section 49 of the Act be applied to the permission.

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Susan Clarke

Planning Inspector

11<sup>th</sup> August 2021