



An  
Bord  
Pleanála

## Inspector's Report

### ABP-313519-22

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<b>Development</b>	Provision of 26 residential housing units.
<b>Location</b>	Drumcliff, Ennis, Co. Clare.
<b>Planning Authority</b>	Clare County Council.
<b>Applicant</b>	Clare County Council.
<b>Type of Application</b>	EIAR Direction under Article 120(3)A of the Planning and Development Regulations 2001-2020. (Application for EIA Screening Determination)
<b>Date of Site Inspection</b>	13 June 2022.
<b>Inspector</b>	Mairead Kenny.

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## **1.0 Introduction**

- 1.1. Under the provisions of Article 120(3)(b) of the Planning and Development Regulations 2001 as amended, Clare County Council is seeking a determination from An Bord Pleanála, as to whether or not the proposed development by the Local Authority would be likely to give rise to significant effects on the environment, and thereby require the preparation of an Environmental Impact Assessment Report (EIAR).
- 1.2. The background to this case includes a third-party request for an EIA Determination under ABP-311736-21. The subject development was to be progressed by the local authority under Part 8. The Part 8 process was ceased following the making of the the request for EIA Determination and a screening determination was not therefore issued.
- 1.3. The local authority states that subject to the outcome of this request and confirmation of the correct consent mechanism, it is intended to progress the proposed development by way of a Part 8.

## **2.0 Site Location and Description**

- 2.1. The subject site is positioned at the eastern side of Drumcliffe Road in a largely residential district in Ennis. The northern, southern and eastern site boundaries are marked by high boundary walls associated with residential developments at these locations.
- 2.2. There is an existing vacant single storey dwellinghouse at the southern side of the road frontage and associated disused agricultural buildings in the immediate vicinity. In this quadrant of the site and also to the north of the curtilage of the dwellinghouse are a number of small trees including elder and hawthorn species. The eastern half of the site is undeveloped and under meadow.
- 2.3. There is treated Japanese Knotweed at a location near the existing house.

## **3.0 Proposed Development**

- 3.1. The proposal would comprise a housing estate development consisting of:

- 26 no. residential units – 6 no. 3-bedroom two storey dwellings, 4 no. 4 bedroom three storey semi-detached dwellings, 2 no. 3-bedroom single storey detached dwellings, 12. No. 2-bedroom two storey terraced dwellings, 2 no. 2-bedroom two storey semi-detached dwellings.
- 48 ancillary parking spaces,
- Vehicular and pedestrian access points.
- Alterations to ground level to accommodate the development.
- Boundary treatments and landscaping.
- Surface water management.
- Demolition of the existing house and other buildings.
- All ancillary site works.

3.2. The request is accompanied by the following documentation:

- Environmental Impact Assessment (EIA) Screening Report
- Screening for Appropriate Assessment
- Ecological Assessment Report
- Invasive Species Management Plan
- Outline Method Statement for Demolition of Existing House
- Refurbishment / Demolition Asbestos Survey (RDAS)
- Site location and site layout map.

The submitted RDAS was originally redacted – the local authority subsequently submitted the full report.

#### 4.0 **Application for Screening Determination**

4.1. The applicant Clare County Council states that the EIA Screening Report prepared by Minogue Environmental Consulting Limited on behalf of Clare County Council provides all of the information required under Schedule 7A of the Planning and Development Regulations 2001 as amended.

4.2. The EIA Screening Conclusion is set out in section 4.1 of the EIA Screening Report and may be summarised as follow:

- The proposed development has been assessed as a sub threshold EIA development.
- Significant environmental impacts are not identified given the scale, nature and duration of the project and the Screening Statement in support of AA.
- The EIA Screening Determination has taken into account the measures in section 2.4 of the report which are stand industry environmental management that are implemented to minimise the impact of projects to the environment.

## 5.0 Planning History

- 5.1.1. Permission was granted under reg. ref. 208003 for a link road to the west of this area. The development was not subject to EIA.
- 5.1.2. ABP-312878-22 relates to lands to the immediate east of the site. The Board refused permission for an application to retain a steel garage housing classic cars at 20 Lissaniska, Drumcliff Road.
- 5.1.3. Other developments in the area are set out in Table 3-1 of the applicant's EIA Screening report and include small residential developments.

## 6.0 Policy Context

### 6.1. Development Plan

- 6.1.1. Under the 2017-2023 Clare County Development Plan Ennis Municipal District the site is zoned R1 Residential.

### 6.2. Natural Heritage Designations

- 6.2.1. The Lower River Shannon SAC is about 100m from the site.
- 6.2.2. There are no other designated European sites proximate to the subject site.

## 7.0 Legislation

### 7.1. Planning and Development Act 2000 (as amended)

- 7.1.1. **Section 172(1)** of the Act states that an EIA shall be carried out in respect of certain applications for consent for proposed development. This includes applications for

'sub threshold' development, which are of a Class specified in Part 2 of Schedule 5 of the Planning and Development Regulations 2001, as amended, but which do not exceed the relevant quantity, area or other limit specified, and where the competent authority determines that the proposed development would be likely to have significant effects on the environment.

7.1.2. **Section 172(1A)** of the Act specifies that the above is relevant to development that may be carried out by the local authority under Part X.

## 7.2. **Planning and Development Regulations 2001 as amended**

7.2.1. **Article 120(3)(b)** of the Regulations states that any person at any time before the expiration of four weeks beginning on the date of publication of the notice may apply to the Board for a screening determination as to whether a development proposed to be carried out by a local authority would be likely to have significant effects on the environment.

7.2.2. **Article 120(3)(c)** of the Regulations indicates that such applications for screening determination shall state the reasons for the forming of the view that the development would be likely to have significant effects on the environment and shall indicate the class in Schedule 5 within which the development is considered to fall.

7.2.3. **Schedule 5** of the Regulations sets out the classes of development where EIA is required.

- Part 1 – Sets out the development classes which are subject to mandatory EIA;
- Part 2 – Sets out development classes subject to EIA where they exceed a certain threshold in terms of scale or where the development would give rise to significant effects on the environment.

7.2.4. **Schedule 7** – Sets out the criteria for determining whether a development would, or, would not be likely to have significant effects on the environment, under three headings-

1. Characteristics of the proposed development.
2. Location of the proposed development.
3. Types and characteristics of potential impacts.

- 7.2.5. **Schedule 7A** - relates to information to be provided by the applicant or developer for the screening of sub-threshold development for the purposes of EIA. The requirement for the submission of this information in the case of requests to the Board for a determination under Article 120(3) of the Regulations arises on foot of revisions to Article 120(3) introduced by the EU (Planning and Development) (Environmental Impact Assessment) Regulations, 2018.
- 7.2.6. **Directive 2014/52/EU** of 16th April 2014, amending **Directive 2011/92/EU** (the EIA Directive) on the Assessment of the Effects of Certain Public and Private Projects on the Environment, entered into force on 15th May 2014. The EIA Directive 2014/52/EU reaffirms that ‘Annex I projects’ shall be subject to EIA and that for ‘Annex II projects’, Member States shall determine whether the project should be subject to EIA on a case-by-case basis or subject to thresholds or other criteria set by the Member State. The screening determination must be based on the information provided by the developer and if mitigation measures are influential to a screening determination, these must be stated by An Bord Pleanála, as the competent authority, in a screening determination. Annex III of the EIA Directive sets out the revised criteria for determining whether projects should be subject to an EIA under three headings.

## 8.0 Relevant Guidance

- 8.1. Guidance document ‘**EIA of Projects - Guidance on Screening**’ published in 2017 sets out a stepped approach to the screening process for competent authorities, as well as two checklists to assist in case-by-case screening.
- 8.2. The publication of the Department of the Environment, Heritage and Local Government of 2003 ‘**Environmental Impact Assessment Guidance for Consent Authorities regarding Sub-threshold Development**’ is guidance on the criteria to be assessed when deciding whether or not a proposed development is likely to have significant effects on the environment.
- 8.3. The publication of the Department of Housing, Planning and Local Government in 2018 ‘**Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment**’ also refers.

## 9.0 Assessment

### 9.1. Introduction

- 9.1.1. The proposed development is set out in Section 3 above. It would broadly comprise the demolition of a dwellinghouse and other buildings on site and the construction of 26 dwelling houses and 48 car parking spaces together with connections to existing services, landscaping and other works.
- 9.1.2. This report is being prepared to support the Board's determination on whether the proposed development would be likely to have significant effects on the environment and require the preparation of an EIAR.
- 9.1.3. I am satisfied that the information specified in Schedule 7A is contained on the file. It concludes that the development does not trigger the requirement for sub-threshold EIA and that an EIAR is not required.
- 9.1.4. I note the submission by the local authority of an Appropriate Assessment Screening report for the development. It concluded that in view of best scientific knowledge, that the proposed development, on its own or in combination with other plans or projects, does not have the potential to give rise to likely significant effects on any European designated sites, having regard to the relevant sites' conservation objectives.
- 9.1.5. The following are considered relevant in the determination of the requirement for EIA.
- Whether the proposed development falls into a project type/class of development under Schedule 5 of the Regulations.
  - If so, what are the relevant thresholds under Part 2 of Schedule 5 of the Planning and Development Regulations 2001-2020, as amended.
  - Finally, it is necessary to examine the proposed development with respect to the criteria set out Schedule 7 of the Planning and Development Regulations 2001, as amended.

### 9.2. Project types/class of development

- 9.2.1. The proposed development involves the construction of dwelling units on zoned lands within the development boundary of Ennis town.



9.2.2. I consider that the relevant Class of development is:

- Class 10(b)(i) of Part 2 of the Fifth Schedule of the Planning and Development Regulations 2001-2020 - construction of more than 500 dwelling units.

9.2.3. It is also appropriate to have regard to the following Class with respect to whether or not it is relevant to the proposed development.

- Class 10(b)(iv) of Part 2 of the Fifth Schedule of the Planning and Development Regulations 2001-2020 (urban development which would involve an area greater than 2ha in the case of a business district, 10ha in the case of other parts of a built-up area and 20ha elsewhere). [In this paragraph, “business district” means a district within a city or town in which the predominant land use is retail or commercial use].

9.2.4. The proposed development comprises a single use type – residential development. I have had regard to the [EC EIA definition document ] and the discussion therein relating to ‘urban development’ under Annex II (10)(b) and note the comments with respect to the inclusion by Member States of residential (and other types of) development under ‘urban development’ in national legislation for the purposes of EIA. The latter approach has not explicitly been undertaken in Ireland and in the context of Class 10(b)(i) the consideration of a solely residential development under Class 10(b)(iv) may seem inappropriate. Nevertheless, I opt to take consider this class also to ensure that all options are covered.

9.2.5. Based on the above I conclude that the proposed development is of a Class for the purposes of EIA.

### 9.3. **Relevant threshold under Part 2 of Schedule 5 of the Planning and Regulations 2001, as amended.**

9.3.1. The threshold under Class 10(b)(i) in Part 2 of Schedule 5 is the ‘construction of more than 500 dwellings’. The proposal involves the construction of only 26 dwellings. The proposed development does not meet the threshold of 500 units to require mandatory EIA. The proposed development does however fall under this class and is therefore sub-threshold development for the purpose of EIA.

9.3.2. For the purposes of Class10(b)(iv), urban development, the site location is not in a business district but is in 'other parts of a built-up area' and in such locations the relevant threshold is 10 ha.

9.3.3. The stated site is 0.74 ha and thus does not meet the area threshold of 10ha. It is therefore also sub-threshold development for the purpose of EIA under this class.

#### 9.4. **Examination of the development by reference to the criteria set out in Schedule 7 of the Regulations**

9.4.1. Schedule 7 lists the criteria for determining whether a development would or would not be likely to have significant effects on the environment.

9.4.2. Schedule 7 criteria fall under the following headings:

- Characteristics of proposed development.
- Location of proposed development.
- Types and characteristics of potential impacts.

9.4.3. These criteria are assessed below.

9.4.4. I have had regard to the information submitted pursuant to Schedule 7A and the legalisation and guidance in my examination below.

#### 9.5. **Characteristics of proposed development**

##### Size and design of proposed development

9.5.1. I consider that the proposed development both in terms of the size of the site, the number of units proposed, and the layout and design are not complicated, unusual or in any way significant and the proposed development is not large-scale. The project is not significantly different in character or scale to the existing surrounding environment. In addition, the number of units the scale of the site is significantly below the thresholds for EIA for residential development and for urban development.

##### Potential for cumulative impacts with other existing and/or approved projects

9.5.2. There is no existing or planned development in the area that would be likely to result in significant cumulative impacts. Any development planned in the area would be of a nature and scale characteristic of this urban location and involving standard construction and operational techniques which would by their nature be amenable

to mitigation. The submitted documentation notes the planned road to the west of the site which is to be constructed and other minor residential development. The potential for cumulative effects during construction would relate primarily to noise, air and general disruption and significant negative cumulative effects could be avoided by the implementation of standard construction management measures. The operational phase impacts would be very limited and in particular the amount of traffic generated at the adjacent road would not be significant.

Nature of any demolition works, use of natural resources, production of waste, pollution and nuisances

- 9.5.3. A small-scale **demolition** is involved in the proposed development. The proposed demolition of the house and sheds on site have been described in the submitted specialist report which outlines the approach to demolition and the requirement to develop a Construction and Demolition Waste Management Plan and sets down standards for dust and noise control. The temporary duration of noise, dust and traffic and the implementation of standard measures will reduce construction disturbance and impacts on residents and the environment.
- 9.5.4. In the context of the scale of the development and its nature the **use of natural resources** will not be deemed to be significant as a regional scale and there is no likelihood of use of resources which would be scarce or potentially cause a threat of significant environmental effects assuming that the materials would be sourced from previously consented facilities.
- 9.5.5. The proposed development involving construction of mainly two-storey dwellinghouses will not give rise to significant quantities of **waste materials** which would pose a threat to the environment and human health. The waste generated as a result of demolition and construction will be managed by a construction waste management plan and adherence to the measures set out therein including standard best practice. The outbuildings, sheds and the house to be demolished have all been examined for asbestos under the submitted Refurbishment / Demolition Asbestos Survey report – asbestos cement has been identified in a bathroom ceiling and will be removed in accordance with the Asbestos Regulations. The removal of Japanese knotweed on the site has been described in detail in terms of the approach to

treatment and removal and the final disposal to a suitable facility. No soil will be removed from the site without the agreement of NPWS.

- 9.5.6. The potential for **pollution and nuisance** arising from the development of this type and scale would be very limited and would arise mainly due to its construction. There would be some potential for noise and disruption. There is potential for pollution events related to the use of potentially hazardous substances such as hydrocarbons. In the absence of drains or streams within the site the proposals for surface water management during construction involve drainage to ground. As there is no discharge to the Claureen River (60m away) there will be no potential impacts to watercourses during the construction phase. The proposed development during construction could give rise to groundwater pollution as the construction would involve use of hazardous substances. The proposed residential development will not lead to risks of land contamination or releases of pollutants on completion. There will be no significant emissions. The discharge of wastewater during operation will be to a properly functioning tertiary treatment plant which has adequate capacity. Surface water would discharge to a nearby surface water pipe.

#### Risk of major accidents and/or disasters including those caused by climate change

- 9.5.7. There is no risk of major accidents related to the construction or operation or demolition works involved in this project. The site is not within a flood zone and would not be likely to result in displacement of waters to other areas and thereby result in downstream flooding.

#### Risk to human health

- 9.5.8. There are no significant risks to human health arising from the construction or operation of the proposed development.

#### Conclusion

- 9.5.9. Having regard to the nature and scale of the proposed development it is reasonable to conclude that there is no likelihood of significant effects associated with the characteristics of the proposed development, including as a result of demolition works, construction and on completion.

### 9.6. **Location of proposed development**

#### Existing and Approved Land Use

9.6.1. The site is within the built-up environs of the town and on zoned land which is largely greenfield, and which contains former residential and related agricultural buildings. A small-scale development of 26 residential units is proposed and the density and general character of involving two-storey houses and public open space would be not dissimilar to the existing development in the area including the residential estates to the north, south and east.

The scale and type of development proposed would constitute a more intensive use of the site on completion compared with the former agricultural and residential uses. On completion there would be a more intensive use of the site, but this would be in keeping with emerging trends in the locality arising from the R1 zoning of the lands.

9.6.2. The proposed residential infill development would complement the pattern of development in the area and would not result in any significant adverse impacts on land use. On completion there is no likelihood of any significant effects in terms of the amenities of the area and the existing land uses.

9.6.3. During construction the proposed development will result in increased activity in the area and increased employment. Once occupied there will be a small increase in population in keeping with the emerging pattern of development in the locality.

Relative abundance, availability, quality and regenerative capacity of natural resources

9.6.4. The proposed development is not likely to adversely affect significant cultural heritage or natural resources which are scarce, of high value or irreplaceable. There is no reasonable likelihood of significant archaeological finds and the building to be demolished is not a protected structure or included on the NIAH. In summary, the cultural heritage assets on site are not of value in terms of their abundance, availability or quality.

9.6.5. The proposed development site is not within a European site and there is no hydrological pathway from the site to the nearby rivers. The AA screening report presented concludes that the proposed development would not result in adverse effects on any European site having regard to the sites' conservation objectives.

9.6.6. Apart from the use of buildings by bats there are no natural resources of significance within the site which is occupied by buildings, improved grassland and some trees

(Fossit Level 3 habitats). There is no evidence of use of the site by ground dwelling mammals.

9.6.7. The use of the site by bats warrants some comment. The buildings which are to be demolished have the potential to provide roosting or foraging for bats. In addition, the site is within the core of sustenance of Newpark House pNHA the outbuildings of which house a nursery roost of lesser horseshoe bats. The surveys of the proposed development site show no use of the site by lesser horseshoe bats in early September 2020 and 2021. The urban character of the area would reduce the potential of the area for roosting and foraging by lesser horseshoe bats. It can therefore be concluded that there is no potential for impact on the pNHA. The surveys undertaken did record three bat species and based on the 2020 survey it was suggested that one of the sheds was being used as a roost by soprano and Leisler bats. The more comprehensive 2021 survey did not suggest any use of that structure by bats.

9.6.8. The site is separated from surface water resources. The proposed development site is not within but is adjacent to Drumcliff Springs Protection Zone, source of public water for the town.

9.6.9. Based on the above it may be concluded that the cultural and natural heritage assets on site are not noteworthy in terms of their relative abundance, availability or quality.

### Conclusion

9.6.10. I consider that it may be concluded that taking into account the proposed and existing land uses and the relative abundance, availability, quality and regenerative capacity of natural resources and cultural heritage resources that there is no likelihood of significant effects due to the location of the proposed development.

## **9.7. Types and Characteristics of the Potential Impact**

### Nature, magnitude and extent of the impact

9.7.1. The extent of the impact of the proposed development in terms of population, increased noise and activity and social and economic consequences would be very much limited to the immediate locality and would not be significant even in the context of the town of Ennis.

- 9.7.2. In general on completion the impact of the proposed development on material assets and human beings would be described as positive.
- 9.7.3. During the construction there would be potential for impacts on air and noise and climate, but all of these impacts would be temporary in nature and localised in extent.
- 9.7.4. Any adverse impacts on the Drumcliff Springs Protection Zone would be described as being potentially of significant magnitude and potentially impacting the town. Impacts of this scale would not be anticipated.
- 9.7.5. As the site does not contain or support natural resources or cultural heritage resources of value, it may be concluded that the impacts on these environmental topics would be described as being of limited extent and neutral. However, as there appears to be some use of the site by bat species which are protected (but not connected with a designated site including pNHAs) there is potential for biodiversity impacts which would be negative. The death of individual bats, if that occurred would be a negative impact.

Probability, intensity and complexity of impacts

- 9.7.6. In the absence of appropriate mitigation there is a high likelihood of mortality of bats which are protected species. The loss of the buildings which may be used as a bat habitat would not constitute a large or intense impact. The impacts on bats overall would not be described as a complex type of impact. Overall, there is no probability of a high level of bat mortality taking into account the limited usage of the buildings and mitigation proposed involving a derogation licence.
- 9.7.7. There is a very high probability that there would not be significant construction phase impacts on surface water and ground water. Due to the location of the proposed development outside the Protection Zone and the absence of surface waters within or in the immediate vicinity of the proposed development site there is considered to be no likelihood of significant impacts. It is also considered that the operation of the proposed development will not contribute to surface water impacts.
- 9.7.8. There is a high degree of likelihood that the construction of the proposed development will give rise to impacts on human beings but also that these impacts

would not be intense or complex. As such these minor impacts would be amenable to being reduced through standard mitigation measures.

9.7.9. There is certainty that there will be impact on soils and geology. The intensity of these impacts will be mitigated by proper construction methodology. There is no likelihood of impacts on geological heritage or valuable aggregates.

9.7.10. There is a high probability that there will be no impacts on cultural heritage.

Expected onset, duration, frequency and reversibility of the impact

9.7.11. The construction phase impacts would be short term and of predictable duration and would not result in any irreversible impacts.

9.7.12. On completion the proposed development would be associated with permanent impacts which would not be significant in the context of the surrounding area and would be in line with the emerging pattern of development in the area.

Transboundary nature of impact

9.7.13. There will be no transboundary impacts associated with the proposed development.

Cumulative

The site is an infill site on zoned lands and in a suburban area where no major developments are planned based on my review of the applicant's submission and the online planning register information. There is a permitted link road to the west of the site and a few minor residential developments none of which are likely to result in significant cumulative impacts on human beings, biodiversity, soils and geology, water, air, climate, noise and vibration, cultural heritage, landscape or material assets.

9.7.14. I conclude that the proposal would not give rise to significant cumulative effects.

Possibility of effectively reducing impact

In general the application of standard best practice construction will ensure that impacts on environmental receptors can be significantly reduced. This is especially relevant to human beings, biodiversity apart from bats, soils and geology, air, climate, noise and vibration, cultural heritage, landscape or material assets. The possibility for effectively reducing impacts on bats and groundwater is subject of further comment below.



The impacts on bats would be amendable to mitigation by measures which are regularly undertaken, highly regulated and likely to be very successful. I consider that the commitment to apply for a derogation licence and the process would ensure that there would be no damage to bats.

The protection of groundwater resources has been identified above as being of potential significance in the context of the proximity of the site to the source protection zone for the public water supply. The site is outside the source protection area which in itself greatly reduces the likelihood of impact. It is also noteworthy that the unsaturated soil and subsoil layer contains a high clay content. During construction various measures are proposed with respect to the handling of potential pollutants. Having regard to the small quantities of pollutants, the limited likelihood of escape of pollutants and the soils there is a very high likelihood that impacts on groundwater would be mitigated.

- 9.7.15. I consider that it may be concluded that taking into account the types and characteristics of the potential impacts that there is no likelihood of significant effects due to the location of the proposed development.

#### **9.8. Conclusion on EIA Screening**

Having regard to the examination above which considers the nature, scale and location of the development, the characteristics and location and the characteristics of potential impacts it is considered that the project is unlikely to give rise to significant environmental impacts. Accordingly, that the preparation and submission of an EIAR, is therefore, is not required.

### **10.0 Recommendation**

- 10.1. I recommend that the Board determine that the development proposed to be carried out by Clare County Council would not be likely to have significant effects on the environment and the preparation and submission of an Environmental Impact Assessment Report is not required for the reasons and considerations set out under.

#### **10.2. Reasons and Considerations**

- 10.3. Having regard to:

- (a) The nature and scale of the proposed development, which is significantly under the threshold in respect of Classes 10(b)(i) (infrastructure – dwelling units) and 10(b)(iv) (urban development) of Part 2 of the Fifth Schedule of the Planning and Development Regulations 2001-2020,
- (b) The location of the site on lands that are zoned for residential use under the provisions of 2017-2023 Clare County Development Plan,
- (c) The location of the site in an established residential area served by public infrastructure including a stated available capacity in the wastewater treatment plant and the existing pattern of development in the vicinity,
- (d) The location of the site outside of any sensitive location specified in article 109(4)(a) of the Planning and Development Regulations 2001-2020 and the absence of any relevant connectivity to any sensitive location,
- (e) the guidance referenced in the Inspector’s report,
- (f) the criteria set out in Schedule 7 and 7A of the Planning and Development Regulations 2001-2020,
- (g) the report and recommendation of the reporting Inspector,

it is considered that the proposed development would not be likely to have significant effects on the environment and, accordingly, that the preparation and submission of an Environmental Impact Assessment Report is not required.

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Mairead Kenny  
Senior Planning Inspector

1 July 2022