

Inspector's Report ABP-315803-23

Development Proposed development of Oriel offshore Wind farm

and all associated infrastructure including on shore

electrical grid connection works

Location Off the coast of County Louth, including the onshore

works comprising underground electrical cabling, through various townlands from the landing of the offshore cable at Dunany Point, to the proposed

onshore substation at Stickillin.

Coastal Planning

Authority

Louth County Council

Prospective Applicant

Oriel Windfarm Limited.

Type of Application

Development in the Maritime Area.

Dates of Pre-Application

15th June 2023,

Meetings

31st August 2023,

9th of November 2023, and

11th December 2023

Date of Site Inspection:

2nd June 2023

Inspector:

Jimmy Green

1.0 Introduction.

- 1.1. This report relates to pre-application discussions held with Oriel Windfarm Ltd. 'the Prospective Applicant' in respect of the development of the Oriel Offshore Wind farm. The pre-application consultation request was received by the Board on the 23rd of December 2023.
- 1.2. This report describes the location and nature of the proposed development, the applicant's submission, the consultations held and the legal provisions which are relevant to the proposed development.
- 1.3. The Board's representatives met with the prospective applicant on four occasions. The presentations provided by the prospective applicant and written records of those meetings are on file (please note in this regard that the Prospective Applicant did not make a presentation at the fourth meeting). This report should be read in conjunction with the written records on file of the pre-application consultation meetings held with the prospective applicant. It is not proposed to repeat the contents of those records in detail here.

2.0 Site Location and Description.

- 2.1. The offshore element of the proposed development is located off the coast of County Louth, to the east of Dundalk Bay. The closest proposed offshore turbines are located c. 6.1km southeast of Cooley Point, c. 18.1km southeast of Blackrock, c. 22km southeast of Dundalk town centre, c.10.4km northeast of Dunany Point and 13.3km northeast of Clogherhead (all reference locations being located in County Louth).
- 2.2. The offshore wind farm area (i.e. area within which offshore turbines are proposed) covers approximately 27.7km² and forms a broadly hexagonal shape. The depths of the sea at the location of the proposed turbines ranges from c. 14-15m deep (at its north-western extent) to depths of c. 30-31m (at its south-eastern extent).
- 2.3. The offshore export cable corridor connects from the site of the proposed turbines to a location just south of Dunany Point, this corridor is at its widest proximate to the offshore turbines where it is c. 4km in width, as it moves towards shore it reduces in width to c. 1 km before reaching its landing point. The offshore cable corridor is c.

- 11km long. The depth of the seafloor varies from the shoreline at Dunany Point to depths of c.28m more proximate to the offshore turbines.
- 2.4. From the landing point/transition joint bay an onshore underground electrical cable is proposed running generally in a westerly direction along and under local and national roads (the L223, Togher Road, Drumcar/Castlethomas Road, L2226, and the N33) for approximately 20.1km until it reaches the location of the proposed onshore substation in the townland of Stickillin, 3km east of Ardee on the N33. The underground cable will cross the Salterstown Stream, Port Stream, River Dee (twice), M1 motorway and the Dublin/Belfast Rail line on its route. The underground electrical cabling route and onshore substation are located within County Louth.

3.0 The Proposed Development.

3.1. Context:

3.1.1. Under the transition provisions of the Maritime Area Planning (MAP) Act 2021 (as amended) the Minister for the Environment, Climate and Communications had the responsibility for assessing applications for Marine Area Consents (MACs) from a first group (phase I) of seven offshore renewable energy projects. As one of the seven phase I projects Oriel Windfarm Ltd. have been granted a Maritime Area Consent (MAC) in relation to the 'construction and operation of an Offshore Wind Farm and associated infrastructure (including decommissioning and other works required on foot of any Development Permission for such Offshore wind farm)' at the subject site (reference no. 2022-MAC-01). The commencement date of the MAC is 23rd December 2022 and the date by which an application for permission must be submitted is 18 months from the commencement date. The MAC relates to an 'array area' (i.e. the general location of the offshore turbines - the hexagonal area described previously above) and a 'subsidiary area' (i.e., the offshore cable corridor also described previously above). A copy of the MAC is included on the file documentation.

3.2. Overview:

3.2.1. The Proposed Development constitutes the provision of an offshore wind farm which will be connected to the national grid at an onshore substation. The offshore components of the Proposed Development include wind turbines, an offshore substation, inter-array cables to connect the turbines to the offshore substation, and an export cable to bring the power from the offshore substation to the shore. After making landfall the cable comes to a transition joint bay close to the shore and from there an underground onshore cable runs to the proposed onshore substation.

3.3. Main Project Components.

3.3.1. Offshore Components:

- Offshore Turbine Array: The proposed development will constitute the provision of 25 no. turbines, which will each have a maximum generating capacity of 15MW each, giving the project a total export capacity of up to 375MW. The turbines will have a maximum blade tip above Lowest Astronomical Tide¹ (LAT) of 270m, a minimum height (of the blade sweep) of 27m above LAT, and a hub height ranging between 145-152m above LAT depending on the foundations provided. The rotor diameter of the turbines will be 236m. The turbines will be provided on monopole foundations and arranged into 5 rows in an approximate SSW-NNE orientation. A minimum spacing of 4 times the rotor diameter (i.e. 944m) will be maintained between turbines.
- Offshore Substation: There will be one offshore substation, which will be provided on a monopole foundation (similar to the turbines) in a specified location in the south-western portion of the array area. The offshore substation will generally have a maximum height of 40m above LAT, however, associated infrastructure on the substation such as lightning protection and the top of the crane will be 48m above LAT. The offshore substation will transform the generated electricity from 66kV to 220kV.

¹ Lowest Astronomical Tide (LAT) is defined as the lowest tide level which can be predicted to occur under average meteorological conditions and under any combination of astronomical conditions.

- Inter-Array Cabling: The inter-array cabling runs from the proposed turbines
 and brings the generated power to the offshore substation. There will be 5 no.
 inter-array cables which will each connect a string of five turbines back to the
 substation.
- Offshore Export Cable: The offshore export cable will be 220kV and runs from the offshore substation to the landfall point just south of Dunany Point (in the townland of Dunany, Co., Louth), the cable will be c. 12km long².

3.3.2. Onshore Components:

- Transition Joint Bay: The Transition Joint Bay (TJB) is provided proximate to the cable landfall, and is a buried chamber c. 12m x 5m where the single marine export cable is connected to the underground onshore export cabling. There are two options proposed for the TJB. The option 1 location is immediately next to the beach, and option 2 is at a location further inshore within an agricultural field c. 40 to the west of option 1. The final location of the TJB will be determined once the thermal rating of the offshore cable can be confirmed.
- Onshore underground electrical cables: The on-shore electrical cables will be provided in a single trench that runs predominantly along local and national road corridors for c. 20.1km in a westerly direction from the TJB, until it reaches the proposed on-shore substation. Where the cabling needs to pass under obstructions such as the River Dee and M1 the route diverts into agricultural fields from where directional drilling will be carried out to cross such features.
- On-Shore Substation: The proposed on-shore substation is located in an agricultural field, accessed directly off the N33, c. 3km east of Ardee, occupying a site which is approximately 3.1ha in area. The substation will have two compounds, one owned by Eirgrid (operated by ESB Networks as the transmission system operator) which will contain Gas Insulated Switchgear (GIS) inside a building, while the other will have outdoor Air

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² The offshore export cable extends beyond the cable corridor into the array area in order to reach the offshore substation.

Insulated Switchgear (AIS) and will form part of the offshore grid owned and operated by EirGrid. Transmission cables from the GIS compound will 'loop in' to connect to the existing overhead power lines passing over this site.

 Temporary Facilities: The construction phase of the proposed development will require temporary construction compounds at the landfall site, off-road sections of the on-shore cable route, and at the on-shore cable route.

It is not intended that works in relation to ports facilities will form part of the upcoming application as the prospective applicant proposed to use facilities that are already in place. Within the future EIAR it is intended that the furthest distance between a potential harbour and the offshore array would be used for assessment purposes.

4.0 Policy Context.

- **4.1.** The following policy documents are of relevance but, it should be noted, do not comprise an exhaustive list:
 - EU Strategy for Offshore Renewable Energy 2020
 - REPower EU 2022
 - National Maritime Planning Framework,
 - Offshore Renewable Energy Development Plan 2014,
 - Draft Offshore Renewable Energy Development Plan 2023,
 - Marine Planning Policy Statement 2019,
 - Project Ireland 2040 National Planning Framework 2040 & National Development Plan 2018-2027,
 - Climate Action Plan 2024,
 - Regional Spatial Economic Strategy for the Eastern & Midland Region 2019, and
 - Louth County Development Plan, 2021 2027.

5.0 Meetings Held.

- 5.1. Four meetings were held with the prospective applicant's representatives on the following dates:
 - 15th June 2023.
 - 31st August 2023,
 - 9th November 2023, and
 - 11th December 2023.
- 5.2. Presentations were provided by the Applicant at all but the last meeting (which was a meeting in relation to application procedures) and these are included in the file together with other information provided to the Board in respect of same. The record of each meeting is also contained on the file.

6.0 Legislative Context.

- 6.1. Section 287(1) of the Planning and Development Act, 2000, as amended ('the Act'), states that a person who proposes to make an application for permission under Section 291 shall consult with the Board. Section 287(2) of the Act states that the Board may provide its opinion regarding the making of the application and in particular, as respects:
 - (a) 'the procedures to be followed by the prospective applicant when making the application and by the Board when considering the application,
 - (b) the documents required to accompany the application,
 - (c) the need for the prospective applicant to create an internet website for the purpose of publishing the application and all documentation accompanying the application,
 - (d) the publication of notices in accordance with this Act, the furnishing of documentation to persons referred to in subsection (3) of section 291 and the making of submissions and observations in relation to an application under that section,
 - (e) such persons as may be prescribed for the purposes of this Chapter,

- (f) some or all of the matters that the Board is likely to take into consideration relating to—
 - (i) the National Marine Planning Framework,
 - (ii) objectives of maritime spatial planning,
 - (iii) principles of proper planning and sustainable development, and
 - (iv) the environment or any European site,

when making a decision under section 293 in relation to the application,

- (g) the fees payable to the Board in relation to the making of the application, and
- (h) compliance by the prospective applicant with any direction of the Board under subsection (3) of section 291.'
- 6.2. Of note, under S.287(3) the Board may at any time conclude a consultation under this section where it considers it appropriate to do so.
- 6.3. Oriel Windfarm Ltd. has made an application for an opinion under S.287A in relation to design options for certain elements of the proposed wind farm, I have addressed such matters separately in my report on that file under, ABP-318274-23.

7.0 Relevant Cases.

- 7.1. The following comprise a list of recent marine related pre-application consultations or applications which are considered of note.
 - ABP-315796: Proposed development of an offshore wind farm and associated infrastructure on and around the Arklow Bank, approximately 6–15km from the shore at Arklow, Co. Wicklow, with a stated maximum export power of up to 800MW, lodged December 2022, consultation has yet to be concluded. Design option pre-application consultation under ABP-316331, lodged April 2023.
 - ABP-315800: Proposed Dublin Array offshore wind farm, located approximately 10km off the coast of Dublin and Wicklow at the Kish and Bray Banks, with a stated maximum export power of between 700 to 850MW,

- lodged February 2023, consultation has yet to be concluded. Design option pre-application consultation under ABP-318552, lodged November 2023.
- ABP-315801: North Irish Sea Array Windfarm Ltd. offshore wind farm off the coast of Dublin, Meath and Louth with a stated maximum export power of 700MW, lodged February 2023, consultation has yet to be concluded. Design option pre-application consultation under ABP-316332, lodged April 2023.
- ABP-315809: Proposed development of Codling Wind Park, offshore wind farm approximately 13-22 km off the coast of County Wicklow between Greystones and Wicklow Town, with a stated maximum export power of up to 1,450MW, lodged February 2023, consultation has yet to be concluded. Design option pre-application consultation under ABP-318588, lodged December 2023 (two previous design option consultations for this project were withdrawn prior to conclusion ABP references 317125 and 317821).
- ABP-317409: Fuinneamh Sceirde Teoranta, proposed development of an offshore wind farm between 5km and 11.5km off the Connemara Coast, at Sceirde Rocks, Co. Galway, with a stated maximum export power of up to 450MW, lodged June 2023, consultation has yet to be concluded.
- ABP Reference: VC0052, Section 182A, pre-application consultation by Oriel Wind Farm Ltd. In relation to the development of a new 220kV substation and underground cabling. Consultation was lodged in October 2010, with meetings held up to 2020.

8.0 Matters Arising.

8.1. Proper Planning and Sustainable Development:

- 8.1.1. Over the course of the pre-application consultations there were a range of discussions with the Prospective Applicant and the Board is referred to the records of the meetings that are attached to the file. I have summarised the broad matters arising below which include inter alia:
 - Proposed Development:

The prospective applicant has committed to a single turbine type for the offshore array, and a single offshore substation is proposed, the locations of the turbines and substation have been determined following seabed surveying, however, prior to construction additional testing will be required to confirm the suitability of the locations and nature of the foundations. (These matters are subject to further discussion in my report under ABP-318274-23).

The operational phase of the proposed development will be from a port in the vicinity which has consents in place for the required infrastructure (office, berths, and small warehouse). The location of the port facility from which construction will be carried out is not yet confirmed.

National Marine Planning Framework (NMPF):

In relation to the National Marine Planning Framework (NMPF), discussions noted that any future application documentation should demonstrate compliance with the range of overarching marine planning policies as well as the sectoral planning policies, along with ensuring that best scientific practice and methods were relied on.

Planning Policy:

The policy context surrounding the proposal ranging from strategic, regional and local issues set out in the NMPF and local Development Plans in the vicinity.

Consultations Undertaken:

The prospective applicant has engaged with the NPWS, Transport Infrastructure Ireland, EirGrid, Louth County Council and sent out consultation/scoping packages to a range of bodies. Public consultation has been on-going through webinars, in person events, and a project website. Furthermore, community and fisheries project liaison officers are in place.

Coastal Planning Authorities and Transboundary Consultees:

Discussions were held in relation to the range of transboundary consultees that would be involved with the Prospective Applicant confirming that through the preparation of the EIAR that consultation correspondence had been issued to Northern Ireland, the UK, Isle of Man, the Loughs Agency, and the

Minister for Foreign Affairs. These transboundary states/bodies were considered relevant due to the nature of the proposed development, its location in the Irish Sea, the potential for cumulative effects to arise, potential for impacts on species (in terms of AA/NIS reporting) as well as a range of environmental criteria (listed further below in section 8.4.6). I note that the closest part of the coastline of Northern Ireland to the Proposed Development is at Cranfield (within the functional area of the Newry, Mourne and Down District Council) which lies approximately 9km north of the turbine array area.

The definition of the relevant coastal planning authority under the provisions of Section 291(3)(b) of the Planning and Development Act 2000 (as amended) was discussed. In this regard it was noted that a coastal planning authority within whose functional area (including nearshore area) the proposed development would be situated or one whose functional area (including near shore) adjoins that part of the maritime area in which the proposed development would be situated may provide a dedicated report including their members views during any future application process.

In relation to the matter of coastal planning authorities I note that the Proposed Development lies entirely within or off the coast of County Louth. County Meath is located in excess of 13km south of the offshore cable landing point and c. 24km south of the offshore array, Fingal is located in excess of 24km south of the offshore cable landing point and c. 32km southwest of the offshore array. Accordingly, I consider Louth to be a relevant coastal planning authority under the provisions of Section 291(3)(b)(V) from which a report (including members consideration) would be appropriate as part of any future application process. While I note that Meath and Fingal County Councils are by definition coastal planning authorities (as they have a coastline), I do not consider the functional areas of either of these authorities (including their nearshore) adjoin that part of the maritime area in which the proposed development is situated. I do, however, consider that it would be beneficial for these authorities to be considered as a prescribed body (in reference to Schedule 1 of the Planning and Development (Maritime Development) regulations 2023, and Section 291(3)(c) of the Act. I have, therefore, included these planning authorities in the list of prescribed bodies in Section 8 below.

Visual Amenities:

The visual amenity of infrastructural elements was also discussed with the applicant stating that all important views will be considered within the application documentation and noting that such matters will be set out in full within the EIAR.

Cultural Heritage and Biodiversity:

Potential impacts on cultural heritage and biodiversity were discussed in broad terms and it was stated that these would be dealt with in the relevant sections of the EIAR. The presence of at least one shipwreck (SS Topaz) within the cable route corridor area was noted.

Fisheries:

In relation to impact on fisheries the applicants stated that there was ongoing and detailed engagement being carried out and it was stated that while there was no trawling in the area of the Proposed Development, that there were several seasonal fisheries operating (including lobster fishing). The seasonal fisheries could be impacted during construction but would be able to continue throughout the operational phase.

Construction:

Construction methods of the various elements of the proposed development were discussed, including the relevant onshore and offshore practices. Any future application will be accompanied by a detailed construction and environmental management plan, and it is proposed that the application documentation will include details of how construction of the various offshore elements will be carried out while minimising the potential for impacts to arise. The EIAR will also include within its assessment any differing impacts arising from the use of alternative construction ports, as the construction port has not been identified.

Operational:

The application documentation including EIAR will consider all potential operational impacts arising from the proposed development and will discuss

any differing impacts that may arise from use of the options of operational and maintenance ports that may be used.

8.2. Environmental Impact Assessment

- 8.2.1. It is proposed to submit an Environmental Impact Assessment Report (EIAR) with the proposed application. The submission from the Prospective Applicant dated 3rd April 2023, includes details of the key environmental considerations in relation to the proposed development as well as a schedule of assessments carried out to inform the EIAR, as well as anticipated key activities/in combination effects with other existing and future users of the marine area (Sections 7.1, 7.2 and 8 of the submission dated 3rd April 2023, refers).
- 8.2.2. While the Board should refer to the record of meetings held that are on file, and the discussion details set out in the previous section, the following include some of the key matters which were outlined during the course of the consultation meetings.
 - Formal EIA scoping was not undertaken by the prospective applicant; however, they have submitted a wide range of informal scoping requests and consultations to a wide range of bodies both throughout the UK and Ireland.
 - The need to provide comprehensive details of the site selection process was outlined. In discussions the prospective applicant stated that the site selection process carried out was informed by various environmental factors and that these would be set out in full within the EIAR, and incorporated into the consideration of alternatives.
 - Due to the long lead-in period associated with the Proposed Development, the importance of ensuring up to date survey data and the importance of incorporating validity exercises on data and surveys used to inform assessments was discussed.
 - The marine mammal population has been identified and will be taken into consideration.
 - Consideration of the decommissioning phase will be included within the EIAR, the project having a lifespan in line with the MAC duration (40 years including decommissioning).

- Consideration of major accidents and disasters will be included within the EIAR, and the applicant stated it did not anticipate that the proposed development would come under the provisions of the COMAH 2015 regulations.
- Potential designation of Marine Protected Areas (MPAs) and the potential of impacts from the proposed development were discussed. The Ecological Sensitivity Analysis of the Irish sea completed by the MPA advisory group indicates that there are areas of sensitivity (in particular in relation to herring spawning gravel beds and eel) that overlap with part of the offshore elements of the proposed development which could potentially form part of a future MPA and highlights the proximity and sensitivity of these species and their habitats to developments of the nature proposed. Any future EIAR will need to address such issues and impacts in full.
- The need to comply with the relevant EU EIA Directive (Directive 2011/92/EU as amended by 2014/52/EU) was outlined.
- It is intended that all anticipated construction and operational phase impacts will be set out in full within the EIAR with all relevant mitigation measures included.
- The overall format of the EIAR was discussed in terms of the nature of the proposed development and the various elements and topics which are intended to be covered.
- The potential for cumulative impacts to arise was discussed and the importance of considering all relevant projects including the other phase I projects in the Irish Sea which would be broadly running along the same timeframe.

8.3. Appropriate Assessment

8.3.1. It is proposed to submit a Natura Impact Assessment Report with the proposed application. The following include matters which were discussed during the consultation meetings.

- In preparing the NIS the Prospective Applicant has considered the likely Zone of Impact of all elements of the proposal.
- The range of Natura 2000 sites considered to be within likely zone of impact and proximity to QIs/SCIs, is not distance based, but arrived at following review of the relevant species and habitats of concern, migratory, roosting and feeding interactions, as well as territorial patterns.
- The designation of the North Irish Sea cSAC which lies predominantly to the south and southeast of the site of the Proposed Development although there is an overlap where some of the offshore cable related works will be located within the cSAC. These issues were discussed with the Prospective Applicant who noted that the NPWS had published specific conservations objectives, and that ornithological surveying results suggests that there will not be significant impacts on the cSAC. The NIS is to contain all the required details in this regard.

8.4. Procedures

- 8.4.1. The prospective applicant confirmed that it was exploring alternative routes to market and that the results of the ORESS auction held in May 2023 (in which the Oriel project was not successful) would not impact on their project timelines, and that they were aiming to lodge a planning application for the proposed development in Q1 2024.
- 8.4.2. At the final pre-application consultation, the prospective applicant requested that the Board set out the relevant procedures in relation to a range of matters including the provision of the stand-alone website, timing and wording of notices, relevant prescribed bodies, application fee, coastal planning authorities, number of hard copies of documentation, and for feedback in relation to the proposed scales and nature of drawings to be submitted in support of any future application (the Prospective Applicant had submitted draft drawings in advance to give an indication of the scales that might be appropriate given the nature of the proposed development). The matter of the timing of the commencement of the relevant section of the Historic and Archaeological Heritage Act (2023), was also raised, with the prospective applicant acknowledging that should this be delayed, they may have to

- adopt a two-application approach. The Board should note that this issue has been addressed through the commencement of Chapters 1, 3, and 8 of Part 13 of the Historic and Archaeological Heritage and Miscellaneous Provisions Act (2023) from the 31st December 2023³.
- 8.4.3. In relation to the prescribed bodies for the purposes of any future application I recommend that the Board consider that the persons listed hereunder be served with the application and accompanying documents. In forming the list hereunder, regard was had to, inter alia, the requirements under Schedule 1 of the Planning and Development (Maritime Development) Regulations 2023. Regard was also had, in drawing up the list below, to the provisions of S.291(3)(b) of the Planning and Development Act 2000 (as amended).
- 8.4.4. The prospective applicant should send the following persons a copy of the application, accompanying documents (including EIAR and NIS) and a copy of the public notice:
 - The Environmental Protection Agency;
 - The Minister for Housing, Local Government and Heritage;
 - The Minister for Agriculture, Food and the Marine;
 - The Minister for the Environment, Climate and Communications;
 - Louth County Council (as the relevant coastal planning authority);
 - The Minister of Transport;
 - The Minister of Defence;
 - The Maritime Area Regulatory Authority;
 - The Minister for Rural and Community Development;
 - The Marine Institute;
 - Inland Fisheries Ireland;
 - Health and Safety Authority;
 - Commission for Regulation of Utilities;

³ SI 653 of 2023 refers

- Failte Ireland;
- An Taisce;
- Meath County Council;
- Fingal County Council;
- The Eastern and Midland Regional Assembly;
- National Transport Authority;
- The Irish Aviation Authority;
- Sustainable Energy Authority of Ireland;
- Eirgrid;
- Commissioner of Irish Lights;
- Irish Coastquard;
- Northern Ireland Department for Regional Development
- The Loughs Agency, and
- The Minister for Foreign Affairs.

The Board may wish to review the above list and satisfy itself that it is sufficient. In this regard, I note that the above list has been compiled on the basis of information that is available from the pre-application consultations and that the applicant who has been carrying out detailed studies and surveys in preparing the EIAR and NIS may consider other bodies to be relevant. Accordingly, I recommend that any communication with the Prospective Applicant advise them that it is open to them to send copies of the application and its associated documentation to any other bodies that they consider relevant on the basis of the studies that they have carried out.

8.4.5. Transboundary Consultation

8.4.6. In addition to the above persons, and having regard to the provisions of S.291(3)(d) of the Planning and Development Act 2000 (as amended), the nature and location of the proposed development, the potential for cumulative effects to arise, and on consideration of commercial fisheries, landscape, seascape, biodiversity and human health, ornithology, marine mammals, wake effects and bats I recommend that the

following states should be notified and engaged with as transboundary states in any future application:

- Northern Ireland;
- Isle of Man;
- Scotland;
- Wales, and
- England.

9.0 Conclusion

- 9.1. Following the completion of the final pre-application meeting on 11th December 2023, I am of the opinion that the process should be concluded, and the Board should notify the prospective applicant that the process is closed and include the attached list of bodies that the applicant is requested to send copies of the application to in accordance with S291(3)(b) and S291(3)(d).
- 9.2. I confirm that this report represents my professional planning assessment, judgement and opinion on the matter assigned to me and that no person has influenced or sought to influence, directly or indirectly, the exercise of my professional judgement in an improper or inappropriate way.

Planning Inspector

11th January 2024