



An
Bord
Pleanála

Inspector's Report 29N.ZE0006

Development	Amendments to the North Lotts and Grand Canal Dock Planning Scheme, 2014 to change the location of two pedestrian/cycle bridges
Location	Dublin
Planning Authority and Development Agency	Dublin City Council
Applicant	Dublin City Council
Type of Application	Amendment to a planning scheme under section 170A of the planning act.
Date of Site Inspection	21/09/2018
Inspector	Gillian Kane

1.0 Background to this Report

- 1.1. A strategic development zone (SDZ) at the North Lotts and Grand Canal Dock was established by the government on 18th December 2012 by SI 530/2012. Dublin City Council is the development agency for this SDZ. Its area is c66ha on both sides of the Liffey to the east of the city centre between the East Wall Road, Sherriff Street and Guild Street on the northside, and around Grand Canal Dock and Sir John Rogerson's Quay on the southside, including the East Link Bridge known as Tom Clarke Bridge. The council made a scheme for the SDZ in November 2013 which was subsequently appealed to the board. Under **29N. ZD2011** the board approved the making of the planning scheme, subject to modifications, on 16th May 2014. The scheme had been subject to appropriate assessment and strategic environmental assessment before its approval.
- 1.1.1. On the 8th August 2017, Dublin City Council in its role as development agency sought to make an amendment to the Planning Scheme, in accordance with section 170A(1). The scheme as approved by the Board included two bridges over the Liffey for pedestrians and cyclists: an eastern bridge in line with Castleforbes Street on the northside and a western bridge in line with Forbes Street on the southside.
- 1.1.2. The proposed amendments sought to change the location of the two bridges. DCC as the development agency seek to provide bridges at New Wapping Street / Blood Stoney Road and immediately west of and parallel to the existing Tom Clarke (former East Link) bridge which connects North Wall Quay with the southern side of the River. DCC state that this amounts to a relocation of the planned bridges eastwards. The two bridges would be designed to open, to allow boats / vessels to pass through.
- 1.1.3. Following the application for amendments a planning report was prepared by a Senior Planning Inspector. It is recommended this report be read in conjunction with the previous planning report on file. This report was considered by the Board on the 10th January 2018, following which a Board Direction dated 12th January 2018 issued.

2.0 The Board Direction

- 2.1.1. The Board direction stated that the Board considered the proposed amendments to be material given that they propose to alter an important element of the scheme. The Direction states that the proposed relocation to alternative locations would be a material deviation from the Planning Scheme because the public living and or working in the area or those with economic interests such as land ownership in the area would have a reasonable expectation as to the future location of the bridges. It states that the relocation of the bridges could affect the amenities of the area by virtue of increased travel distances or general inconvenience, or by virtue of changes to wider patterns of movement of pedestrians and cyclists in the areas. The Board stated that the proposed amendments would satisfy the criteria of section 170A(3)(b) of the Act and therefore would not affect the overall objectives of the scheme or require a more fundamental review procedure. The Board adopted the SEA and AA screening carried out by the Inspector and agreed with his conclusion that the proposed amendments did not trigger a need for SEA or AA. However, given the proposed amendment to a central and established element of the scheme, the Board considered that public consultation was required. The Board considered that the tests of materiality needed to be considered independently of section 170A(3)(b).

3.0 Public Notification

- 3.1.1. In accordance with section 170A(7) the Board required the Development Agency to send notice and copies of the proposed amendment of the planning scheme concerned to the Minister and the prescribed authorities and publish a notice of that proposed amendment in one or more newspapers circulating in the area concerned. The notices were required to state the reasons for the proposed amendment, provide details of where it could be inspected and that written submissions could be made within a 4-week period. The Planning Authority were required to prepare a report on any submissions received and make this available to the Board.
- 3.1.2. The proposed amendments went on display from Tuesday 6th February to Monday 5th March in two locations: Dublin Docklands Office and the City Council offices. The notice published by the Planning Authority states that the main reasons for the proposed amendments are:

- The currently proposed bridge at Forbes Street would be premature due to planned works relating to DART underground. An alternative location at Blood Stoney Road can be delivered in a shorter time frame.
- There is an identified need for a pedestrian / cycle bridge immediately beside the Tom Clarke (former East Link) bridge. To provide this and the planned bridge at Castleforbes Road (under the Planning Scheme) is considered excessive. It is proposed to replace the proposed Castleforbes bridge with a new bridge parallel to the Tom Clarke bridge.
- This would allow more quayside space for boats / tall ship events, supporting more activity in the River Liffey, in accordance with the Liffey animation strategy.

4.0 Submissions

4.1.1. Following the public notification process 13 no. submissions were received by DCC. The issues raised in these can be summarised as follows:

- 1 **Crossman Properties:** Located in City Block 9. Support the proposed amendments which will secure the delivery of critical infrastructure for the Docklands. Improving connectivity will benefit existing and future businesses and residents and will help foster innovation, inclusiveness and access to services and facilities in the Docklands.
- 2 **National Treasury Management Agency:** The NTMA supports the replacement of the two pedestrian / cycle bridges across the River Liffey to New Wapping Street / Blood Stoney Road and immediately west of and parallel to the existing Tom Clarke bridge.
- 3 **Environmental Protection Agency:** DCC is requested to ensure that the proposed amendments are consistent with the National Planning Framework, particularly those relating to environmental protection. Amendments should be screened against Schedule 2A criteria of the SEA Regulations.
- 4 **TIO DAC and Targeted Investment Opportunities ICAV:** Wish to support the proposed material amendments which will optimise permeability for pedestrians and cyclists between the North and South Docks development

areas and will increase accessibility to public transport nodes for employees, residents and visitors.

- 5 **Grant Thornton:** The proposed new location of the bridge connecting Blood Stoney Street with New Wapping Street is more appropriate as it will improve connectivity between the north and south docks. The proposed pedestrian bridge parallel to the East Link Road bridge will greatly benefit the pedestrian cycle and public transport network for the area. The receivers of the Exo wish to strongly support the revised locations.
- 6 **DAU of the Department of Culture Heritage & the Gaeltacht:** The new location appears to be the Dodder public transportation opening bridge. The SEA and AA need to be amended to include the following issues:
 - a. Otters use the area in the vicinity of the proposed Dodder public transportation opening bridge and they move between the Rovers Liffey and Dodder and the Grand Canal Basin and Grand Canal. It should be assumed that they may use any steps along the waterways. Otters are protected by Annex IV. Consideration should be given to the creation of artificial otter holts as a measure to maintain the biodiversity of the area.
 - b. Bats are known to frequent the docklands area. A bat survey carried out at the appropriate times should establish bat usage and existing bat data. The impact of any new lighting on bats should be assessed.
 - c. Birds: Black guillemots and tern species are likely to be present at the proposed locations, particularly the proposed Dodder public transport opening bridge. Consideration should be given to the creation of artificial breeding holes for black guillemots. The Luas is proposed to use this bridge, therefore the issue of bird collisions with overhead cables needs to be assessed. Data on bird flights in the area is required.
 - d. Rare Plants: A flora survey is required as rare plants have been found in the docks in the past.
 - e. Marine Issues: the issue of marine mammals including seals needs to be assessed. Best practice guidelines should be adhered to at

construction stage. Specialist expertise is required should hazardous material be encountered. The infill of the river Liffey should ensure that the source of fill is uncontaminated and free from invasive alien species. Information should be provided on any impacts likely to occur elsewhere in Dublin Bay from altered patterns of erosion and deposition which may impact on European sites.

- 7 **NAMA:** Nama wish to support the proposed relocation of the two bridges as they offer a viable and more appropriate alternative to the original locations and therefore support the achievement of a more sustainable modal split in this area of the Docklands. Given the requirement to reserve lands at Block 2A &C and 7A &C for the future development of the DART underground the new location of the bridge connecting Blood Stoney Street with New Wapping Street will secure earlier delivery of this infrastructure that will improve connectivity between north and south and between sustainable public transport modes. Nama supports the proposal to provide a pedestrian bridge directly parallel to the East Link Road bridge as the new location more appropriately aligns with the cycle strategy for the north and south campshires and the wider Sutton to Sandycove cycling route.
- 8 **Chinook Investments:** Located at Block 3 in the North Lotts. The relocation of the pedestrian bridge from Forbes Street to Blood Stoney Road is welcomed due to the implications of Dart underground and the impact it may have on the deliverability of the bridge at this location. Support is given to the relocation of the second, eastern most bridge to the proposed location beside the Tom Clarke Bridge.
- 9 **Eastern and Midland Regional Assembly:** The Regional Planning Guidelines for the Greater Dublin Area 2010-2022 support the enhancement of the strategic infrastructure required to improve sustainable transport and t6o support the sequential development of the North Lotts and grand Canal SDZ, which is considered to be of strategic economic and social importance to the state. The regional assembly supports the inclusion of policy that recognises the importance of artistic and cultural activities.

- 10 **Department of Housing, Planning and Local Government:** The department is of the opinion that the rationale for both proposed alterations is reasonable. Proposals to limit the complications associated with the construction of any future Dart underground is also welcomed by the Department with the movement of the proposed bridge to a suitable site further to the east. The improvement of pedestrian / cyclist facilities in the vicinity of the East Link Bridge further enhances cross river links at an important juncture, allowing for improved connectivity between the Poolbeg West SDZ and north of the Liffey. The Department welcomes both proposals.
- 11 **Transport Infrastructure Ireland:** It is critical that the proposed amendments to the planning scheme address potential issues associated with the Dublin Tunnel (M50) and are compatible with provision for the M50 South Port Access Route (formerly Eastern Bypass) which has been indicated in the National Development Plan. It is unclear how the proposed bridge west of the Tom Clarke Bridge will tie in or impact with the M50 South Port Access Route (formerly Eastern Bypass). Careful coordination will be required between TII, NTA, DCC and the Port Company on this future national road project and all bridge projects in this area. TII request that an evaluation of the proposal be undertaken to take account of the Dublin Eastern Bypass Corridor Protection Study Sector A: Dublin Tunnel to Sandymount Strand, with cross organisational interaction between DCC, NTA, Dublin Port Company and TII.
- 12 **McCann FitzGerald:** Support the repositioning of the proposed new pedestrian / cycle bridges.
- 13 **Gibson Hotel:** Wish to express 100% support for the proposed two new pedestrian and bike bridges. The improved connectivity and resulting ease of access between the south and north docks would be hugely beneficial for both customers, employees and residents in the north and south docks.

5.0 Planning Authority Report on the Consultation Phase

- 5.1.1. On the 13th April 2018, the Planning Authority submitted a report on the consultation phase to the Board, copies of all material made available during that consultation phase AA screening report and SEA screening assessment of the proposed amendments.

5.1.2. The report states that 13 no. submissions were received, a summary of which is included in section 4 of the report. The report states the majority of the submissions were in support of the proposed amendments, that DCC welcomes the positive comments and looks forward to progressing delivery of this important infrastructure. The report states that the Council agree that there would be benefits to pedestrians and cyclists as the new bridges would ease congestion and provide alternatives. Proposed bridge locations would work in tandem with other forthcoming improvements in sustainable transport (eg Lihaf approved Dodder Bridge and improvements to strategic cycle network). Improved permeability will help achieve sustainable transport goals in an area where residential and commercial population is increasing. The response of the Planning Authority to each of the submissions can be summarised as follows:

1. **Department of Housing, Planning and Local Government:** support for the scheme is welcomed given the Poolbeg West SDZ Planning Scheme and the need to address Dart underground timeline restrictions.
2. **Eastern & Midlands Regional Assembly:** DCC agrees that improvements to the transport network will improve the sustainability of the wider area.
3. **Transport Infrastructure Ireland:** DCC is cognisant of the need to reserve a corridor for the M50 South Port Access Route – it is provided for in Objective MT032 of the development plan (section 8.5.7) and MV4 of the draft Poolbeg West SDZ planning scheme. DCC agrees that a coordinated approach between TII, the NTA, DCC and the Port Company is the best way to achieve tie-in with the proposed bridge and the M50/SPAR. Regarding the TII's request for the proposed development to take account of the Bypass Corridor Protection Study Sector a Dublin Tunnel to Sandymount Strand and evaluate the impact of the proposals on the Eastern Bypass Corridor, DCC state that the scale and location of the proposed bridge (at the western extremity of the illustrated project corridor) and the anticipated extent of works, it is not likely to have significant impacts on the protected corridor and would not jeopardise the delivery of the bypass Motorway. The proposed bridge will integrate with pedestrian / cycle movement on the proposed Dodder bridge. DCC state that postponing the pedestrian bridge which would have a low impact on the established built environment due to a future project that is not yet designed

would be excessive. The response notes that the National Planning Framework includes in its national infrastructure objectives “facilitating the growth of Dublin Port through greater efficiency, limited expansion into Dublin Harbour, and improved road access particularly to / from the southern port area” (pg.s 37 &142). The National Development Plan 2018-2027 lists the M50 Dublin Port South Access as one of 22 no. sections of national road network which will “be progressed through pre-appraisal and early planning during 2018 to prioritise projects which are proceeding to construction”. The NTA’s Transport Strategy for the Greater Dublin Area 2016-2035 seeks to develop “a road link connecting from the southern end of the Dublin Port Tunnel to the South Port Area, which will serve the south port and adjoining development areas”. DCC state that this demonstrates that the provision of a South Port Access is clearly a longer-term project. The response refers to 29N.PA0034 Alexandra Basin redevelopment project which included works on the northern side of the river, to the east of the Tom Clarke bridge and improvements to the pedestrian environment to enhance east-west connectivity into the basin area. It is stated that the current proposal would be compatible with this project.

4. **Dept. of Culture, Heritage & the Gaeltacht:** The planning scheme is committed to the protection, conservation and improvement of the environment. The scheme was adopted alongside an SEA, AA, SFRA and Contamination and Remediation Assessment (CRA). All potential adverse effects or residual effects from the proposed bridge relocation are either already present, will be further contributed towards or would be mitigated against. DCC is carrying out an EIA for the Dodder public transportation opening bridge.
5. **Environmental Protection Agency:** DCC has taken a precautionary approach to environmental protection. Where changes to the amendments are proposed prior to finalisation DCC will screen for potential likely significant effects in accordance with SEA regulations Schedule 2A criteria and notify environmental authorities.

5.1.3. The report concludes with the statement that the proposed amendments are consistent with the proper planning and sustainable development of the area, the statutory obligations of the Local Authority and the relevant Government objectives.

6.0 Assessment

This report is written having regard to the Direction of the Board dated 12 January 2018, wherein it was stated that the Board decided that the proposed amendments would be a material change given that they proposed to alter an important element and that the public living and or working in the area or those with economic interests such as land ownership in the area would have a reasonable expectation as to the future location of the bridges. The Board considered that the relocation of the bridges could affect the amenities of the area by virtue of changes to wider patterns of movement of pedestrians and cyclists in the wider area.

6.1. Proposed relocation of Forbes Street Bridge to Blood Stoney Road / New Wapping Street

6.1.1. The submission of DCC to the Board states that the reason for proposing the relocation of the bridge from Forbes Street eastwards to Blood Stoney Road / New Wapping Street is that the currently proposed bridge at Forbes Street lies over the Dart underground reservation strip. It is submitted that the Forbes street location, being within the zone of influence would be premature but also that building the bridge over a rail tunnel would be prohibitively expensive and therefore design work on the Forbes street location has been suspended. It is submitted that the alternative location at Blood Stoney Road can be delivered in a shorter time frame as there would be no need to wait for the outcome of the Dart underground review, noting that the timeframe for the review is unknown.

6.1.2. The Board will note that all submissions to DCC following the public consultation support the proposed relocation to Blood Stoney Road / New Wapping street, citing the increased connectivity and need to ensure early delivery of such infrastructure.

6.2. Proposed relocation of the Pedestrian / Cycle Bridge from Castleforbes Road to immediately west of the Tom Clarke Bridge.

6.2.1. DCC submit that the relocation of the proposed pedestrian / cycle bridge from a position at Castleforbes Road to a new location immediately to the west of the existing Tom Clarke Bridge is to fulfil an identified need for a pedestrian / cycle bridge immediately beside the Tom Clarke (former East Link) bridge. It is submitted that facilities on the existing bridge are poor and widening it is not possible. A new

bridge parallel to the Tom Clarke bridge would resolve this issue but that it would be excessive to provide this and the bridge at Castleforbes Street. DCC state that connectivity westwards from the southern end of the Tom Clarke bridge will improve significantly when the Dodder bridge (which is now at design stage) is delivered.

- 6.2.2. The Board will note the submissions in support of the proposed pedestrian bridge, citing improved connectivity, cross river links and the realisation of one element of the wider pedestrian / cycle strategy for the area including the Sutton to Sandycove cycling route.
- 6.2.3. The submission of Transport Infrastructure Ireland on the proposed relocation states that the impact of the eastern most bridge on the M50 South Port Access Route (SPAR), formerly known as the Dublin Eastern Bypass must be considered. TII request that careful coordination of the future road project and all bridge projects in the area be undertaken by TII, the NTA, DCC and the Port Company. They request that an evaluation of the proposal (one assumes this refers to the proposed amendments) be undertaken to take account of the Dublin Eastern Bypass Corridor Study Sector A: Dublin Tunnel to Sandymount Strand.
- 6.2.4. In their report to the Board DCC as development agency state that they agree with such a suggestion and that such coordination will greatly assist the detailed design stage of the Dodder Bridge. They note that the protection of the route is an objective of both the City Development Plan (Objective MTO32) and of the draft Poolbeg West SDZ Planning Scheme (objective MV4). DCC state that the nature and scale of the proposed pedestrian bridge is such that it is not likely to have any significant impact on the protected corridor. It is submitted that postponing the proposed pedestrian bridge for a future project that is not yet at design stage is unreasonable. DCC note that the Board granted permission for redevelopment at Alexandra Basin (to the east of the Tom Clarke bridge) after the 2014 bypass protection corridor study in 2014.
- 6.2.5. The Boards attention is drawn to drawing no. 12.127.110.01 found in the Corridor Protection Study (appended). The proposed location for the pedestrian bridge is approximately at the western boundary of the study area. Section 3 of the report states that development should not generally be permitted within this corridor where it would jeopardise the deliverability of the Eastern Bypass motorway. It is

considered that the scale and location of the proposed pedestrian bridge is such that it is not likely to jeopardise the deliverability of the Eastern bypass motorway.

- 6.2.6. The request of TII for cross organisational interaction between DCC, the NTA, Dublin Port Company and TII is noted, as is the agreement of DCC for such a process. This is outside the remit of the Board under section 170A however.

6.3. **Dodder Public Transportation Opening Bridge**

- 6.3.1. With regard to the submission of the Department of Culture, Heritage and the Gaeltacht, the Board will note that the proposed relocated pedestrian bridge will run to the north of the Dodder public transportation opening bridge but is not the actual bridge location as suggested in the submission. (See drawing no DPTB ROD C1 DOB DRG EN 00103 of the Dodder Public Transportation Opening Bridge: Public Consultation documentation). The drawing clearly shows the route of a “possible location of a future footbridge”. The outline scheme proposal for the Dodder bridge ties in with the future footbridge and the Tom Clarke bridge.

6.4. **Nature Conservation**

- 6.4.1. I note the submission of the Development Applications Unit regarding heritage-related observations / recommendations. The direction of the Board dated 10th January 20148 states that the proposed amendments do not affect the overall objectives of the scheme and that the need for SEA or AA does not arise owing to the nature of the proposed amendments and the scope of the original SEA and AA procedures already completed for the adopted scheme.

6.5. **Changes to Movement Patterns**

- 6.5.1. In declaring the proposed relocations material the Board considered that the relocation of the bridges could affect the amenities of the area by virtue of changes to wider patterns of movement of pedestrians and cyclists in the wider area.
- 6.5.2. A transport assessment of the proposed amendments was submitted to the Board in July 2017. The report discusses the impact on pedestrians (section 3) and on cyclists (section 4). The report states that in a do-nothing scenario, the existing bridges (Samuel Beckett to the east and Tom Clarke to the west) would experience significant pedestrian capacity issues.

- 6.5.3. In the adopted planning scheme location, the bridge at Forbes Street would accommodate 1760 pedestrian movements whilst the proposed relocation to Blood Stoney Road / New Wapping Street would accommodate 1600 pedestrians. In the relocated scenario the Samuel Beckett bridge would see an increase from 1520 to 1680 pedestrians. The use of the Tom Clarke bridge by 500 pedestrians remains unchanged. The report did not analyse the impact of a new pedestrian bridge to the west of and parallel to the Tom Clarke bridge.
- 6.5.4. For cyclists, the report acknowledges that predictions are difficult but it is expected that “a significant proportion of cyclists would divert” from the Samuel Beckett bridge to a new bridge at Forbes street. Relocating that bridge to Blood Stoney Road / New Wapping Street would not result in such significance as the physical barrier of the Grand Canal Dock on the south side keeps desire lines to the west. The report states however that future projects such as increased development in Poolbeg, improved circulation created by the Dodder Bridge, the proposed Dodder Greenway and Liffey cycle route schemes will improve the attractiveness of the New Wapping Street location.
- 6.5.5. The report acknowledges that the proposed relocations will result in fewer pedestrians and cyclists using the new bridges than those in the original locations. The summary of the report is that this is acceptable however given the cost and time consequences associated with the original locations.
- 6.5.6. The decision for the Board therefore, is to weigh up the gains accrued from providing bridges sooner and at a lower cost against the fact that fewer pedestrians and cyclists will use the relocated routes. Whilst information is presented on the number of pedestrians each option will accommodate, no such information is given on cyclists, timeframes or costs – only that certain outcomes are “less expensive”, are “anticipated” or “likely”. It is difficult to evaluate the implications or consequences of the proposals with unsupported information. While the submissions in support of the proposed relocations demonstrate the exigency for infrastructure that will increase connectivity in the area, the proposed infrastructure will exist for a significant length of time with long-term impacts on the area.
- 6.5.7. I note that the submission of DCC refers to the advantages of the proposed amendments, one of which is listed as a reduction in the number of bridges. Page 5

of the August 2017 submission to the Board refers to the subdivision of a 900m section of the river currently without bridges into three sections of 200m, 375m and 325m. The submission notes that the Dublin Port company raised a concern that such a division could work against the stated objective of animating the river. The proposed relocation of the pedestrian bridge immediately to the west of the Tom Clarke bridge would overcome that concern, effectively resulting in the subdivision of the 900m section into two rather than three.

- 6.5.8. The advantages of the proposed relocations are that the bridges are that they can be delivered sooner (although this is not quantified), at a lower cost (again this is not quantified) and provide a longer stretch of river without a crossing point. The disadvantage is that the new locations would not benefit as many pedestrians and cyclists.
- 6.5.9. On balance, it is considered that the reduction in the number of pedestrians and cyclists accommodated in the new locations is acceptable given the greater gains to be achieved from providing the infrastructure sooner and at a lower cost. The proposed relocated bridges will contribute to the achievement of the objectives of the planning scheme (MV1, MV3 and MV4) to promote a shift towards more sustainable forms of transport, provide additional cycle and pedestrian bridges and to link in with the wider walking and cycling networks.

7.0 Conclusion and Recommendation

- 7.1.1. I note the direction of the Board that the proposed relocation of the bridges constituted material changes but that they fell within the criteria of subsection 3(b) of section 170A. I further note the direction of the Board that the proposed amendments did not affect the overall objectives of the scheme and that the need for SEA or AA did not arise owing to the nature of the proposed amendments and the scope of the original SEA and AA procedures already completed for the adopted scheme. Therefore, regarding the proposed relocation of the bridge from Forbes Street to Blood Stoney Road / New Wapping Street and the bridge from Castleforbes Road to a location immediately west of and parallel to the Tom Clarke Bridge and following the public consultation process undertaken in accordance with section 170A(7), it is recommended that the Board approve the proposed amendments in accordance with section 170A(4)(b) for the following reasons and considerations:

8.0 Reasons and Considerations

Having regard to:

- The planning history of the SDZ scheme approved by Board in May 2014 and to the overall scope and objectives of the approved planning scheme,
- The nature of the proposed amendments which are necessitated by circumstances arising from the progress of the DART Underground project and the physical constraints on providing better pedestrian and cycle facilities on Tom Clarke Bridge,
- The report of Dublin City Council following the consultation process
- The individual responses to public consultation
- And the second report of the Inspector

It is considered that the proposed amendments, namely relocating the proposed pedestrian cycle bridges at Forbes Street and Castleforbes Road to New Wapping Street / Blood Stoney Road and immediately west of and parallel to the existing Tom Clarke bridge, are consistent with the strategic movement vision for the area of an environment that is pleasant, accessible and easy to move around on foot and by bicycle and where movement to, from and within the area is predominantly by sustainable means. The proposed amendments are, therefore, in accordance with the project vision set out in the North Lotts and Grand Canal Dock SDZ Planning Scheme 2014 and with the proper planning and sustainable development of the area.

Gillian Kane
Senior Planning Inspector

12th October 2018