

Heather Cooke

From: louisw w <louisw01@outlook.com>
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To: RSES
Subject: Submission, draft E&M RSES document
Attachments: Planning Submission, RSES, Patrick Molloy, Clonee, Co Meath(10).pdf

Follow Up Flag: Follow up
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Dear Sir/Madam, please find hereby attached a submission to the draft E&M RSES document, for your consideration.

I would appreciate you acknowledging receipt.

Kind Regards,
Louis Wildenboer

L.Wildenboer
Senior Planner
(B.Art etc Scientia Town and Spatial Planning) MIPI, Dip. PM, MBA Dip.)

34 The Crescent Castle Oaks,
Co. Carlow / Dublin
tel.(m): 0863939430
email: lwildenboer@outlook.ie
website: [ERMS-Planning](#)



Planning Submission on Draft Eastern & Midland Regional Spatial & Economic Strategy (RSES), 2019-2031

In respect of

**Lands at Clonee
Dunboyne,
Clonee,
Meath Co.**

Prepared by

ERMS PLANNING CONSULTANTS

On behalf of

**Patrick Molloy
12 St Brigids Shopping Centre
Main Street
Blanchardstown
Dublin 15**



34 The Crescent Castle Oaks,
Co. Carlow
tel.(m): 0863939430
email: Lwildenboer@outlook.ie

Eastern and Midland Regional Assembly
3rd Floor North
Ballymun Civic Centre
Main Street
Ballymun
Dublin
D09 C8P5

Our Ref: ERMS/1907

Your Re:

Ref.

23 January 2019

Dear, Sir/Madam

RE: Planning Submission on Draft Eastern & Midland Regional Spatial & Economic Strategy (RSES), 2019-2031.

1.0 INTRODUCTION

- 1.1 On behalf of our client Patrick Molloy, 12 St Brigids Shopping Centre, Main Street, Blanchardstown, Dublin 15, we hereby wish to make a Planning Submission, in accordance with Section 24 of the Planning and Development Acts 2000-2018, as Amended, on the Draft Eastern & Midland Regional Spatial & Economic Strategy (RSES), 2019-2031.
- 1.2 Our client is a businessman and property owner in Clonee and have a long-term interest in local enterprise, development policy and policies applicable to his property in the area. Given that the Draft Regional Spatial & Economic Strategy (RSES) supersedes the county development plan and all subsequent local-area plans, as provided for under the act, they will be led by the philosophy, principles, concepts policies and development objectives that are being put forward by the draft Regional Spatial & Economic Strategy.
- 1.2 In this context, it submitted that it is critical that the assumptions of these concepts are considered by local people and stakeholder as part of the public consultation process. On behalf of our client we, therefore, urge the Eastern and Midland Regional Assembly in their consideration of submissions, by local people dealing with local issues, to seriously consider the cascading linkage between proposed high-level RSES policy and the eventual local development policy that will take effect on the ground.

- 1.4 The proposed amendments to policy in this submission, have been based on the planning technical hierarchical linkage and cascading effect of these policies on the future development plan, local-area plans, and decision-making by the council; and in turn on future development proposals and physical developments.
- 1.5 It is therefore submitted that given the draft status of the plan, the statutory public participation process and the democratic system it is set within that it is of critical importance that the regional assembly does not assume that the principles stated in the draft strategy, are fixed. These principles along with data must remain open to amendment until the strategy is adopted. While we understand of cause that all principles in the draft RSES must be consistent with the broader principles in the Planning and Development Act and the National Planning Framework(NPF), it is clearly held that they provide but “a broad envelope” and that the specific focus of high-level principles, and in many cases, policy objectives and concepts have a wide variety of optionality and flexibility as to their formulation, focus and actual described objectives. The submission is therefore intent to comment on these more subtle focusses, which can have far reaching effect for local development, down the line.
- 1.6 In this context, the submission proceeds to comment, make proposals and consider the absence or omission of policy statements in the draft Regional Spatial & Economic Strategy as it related to the Act and NPF, and in turn makes proposals for amendment, inclusions or omission of policies to the Eastern and Midland Regional Assembly.
- 1.7 In consultation with our client, the submission is particularly focused on seeking solutions to practical problems on the ground, as initially influenced and led by high-level policy.

2.0 STRATEGIC PLANNING CONTEXT

National Planning Framework

- 2.1 The National Planning Framework (NPF) is the Government’s high-level strategic plan for shaping the future growth and development of our country out to the year 2040. The framework guides public and private investment, to create and promote opportunities for the population and to protect and enhance the environment, including villages to cities and every settlement in between.
- 2.2 The framework targets more balanced growth, which also means more concentrated growth in the five main cities of Ireland of population size more than 50,000 people, i.e. Dublin, Cork, Limerick, Galway and Waterford. It targets these five cities for 50% of overall national growth between them, with Ireland’s large and smaller towns, villages and rural areas accommodating the other 50% of growth.
- 2.3 This national statutory planning policy indicates a significant need for residential densification within “existing built-up areas of cities” on “infill and/or Brownfield sites,” to achieve this it indicates that a major new emphasis will need to be taken by policy developers such as Meath County Council toward renewing and developing existing settlements.

"A major new policy emphasis on renewing and developing existing settlements will be required, rather than continual expansion and sprawl of cities and towns out into the countryside, at the expense of town centres and smaller villages. The target is for at least 40% of all new housing to be delivered within the existing builtup areas of cities, towns and villages on infill and/or brownfield sites" (Section 1.2 Making the Vision a Reality - A New Strategy for Managing Growth, Project Ireland 2040- National Planning Framework, 2018, p.11).

- 2.4 The framework specifically indicates the need for better use of under-utilized land and buildings *"including 'infill', 'Brownfield'" and publicly owned sites and vacant and under-occupied buildings, with higher housing and jobs densities, better serviced by existing facilities and public transport"* (Section 2.2 Overview of the NPF Strategy-Compact Growth, Project Ireland 2040- National Planning Framework, 2018, p.28).

- 2.5 Specific to Dublin City and Metropolitan area it states that in addition to large residential regeneration and redevelopment projects, that densification will also be achieved by realising smaller-scale infill and Brownfield opportunities with regard to underutilised land through well-designed high-density development.

"It also means ensuring that smaller scale opportunities for infill and brownfield development are realised" (Section 3.2 Eastern and Midland Region - Dublin City and Metropolitan Area, Project Ireland 2040- National Planning Framework, 2018, p.36).

- 2.6 The framework adopts a national policy objective, that firmly establishes a presumption in favour of residential development in cities and towns,

"National Policy Objective 11: In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth", (Section 4.5 Achieving Urban Infill/ Brownfield Development, Project Ireland 2040- National Planning Framework, 2018, p.65).

- 2.7 Importantly, it recognises that the development of Infill and Brownfield developments are more challenging to deliver due to land management and community resistance against new developments. In this context, it is important that flexible "Design-led Standards" and "Performance-based outcomes" should be applied to these types of developments.

"To enable brownfield development, planning policies and standards need to be flexible, focusing on design led and performance-based outcomes, rather than specifying absolute requirements in all cases. planning standards should be flexibly applied in response to well-designed development proposals that can achieve urban infill and brownfield development objectives in settlements of all sizes. ... general restrictions on building height or general restrictions... should be replaced by performance-based criteria ... e.g. city/town centre, public transport hub, inner suburban, public transport corridor, outer suburban, town, village etc"

(Section 4.5 Achieving Urban Infill/ Brownfield Development, Project Ireland 2040- National Planning Framework, 2018, p.65).

- 2.8 The framework, specifically set out a National Policy Objective to allow for the flexibility required to develop Infill or Brownfield sites in “city/town centre,” “inner suburban” or “outer suburban” areas, which will allow for a range of tolerances that will enable alternative solutions.

“National Policy Objective 13

In urban areas, planning and related standards, including in particular building height and carparking will be based on performance criteria that seek to achieve well-designed high quality outcomes in order to achieve targeted growth. These standards will be subject to a range of tolerance that enables alternative solutions to be proposed to achieve stated outcomes, provided public safety is not compromised and the environment is suitably protected” (Section 4.5 Achieving Urban Infill/ Brownfield Development, Project Ireland 2040- National Planning Framework, 2018, p.65).

- 2.9 Crucially the framework identifies that this more dynamic and flexible approach will also be applicable to urban land use where the existing character of the land use in an urban area is subject to change. It qualifies how development proposals in such a changing area should be addressed through the application of an “overall area” plan or “master plan” and be suitable for application on an incremental basis.

“This more dynamic approach will also be applied to urban land use, where the existing character of land use in an urban area may be subject to change. This should generally be as part of an overall area or master plan and/or be suitable for application on an incremental basis”, (Section 4.5 Achieving Urban Infill/ Brownfield Development, Project Ireland 2040- National Planning Framework, 2018, p.65).

- 2.10 It is submitted that the draft RSES needs to incorporate the above stated NPF policies, as the policy solutions that need to be carried through the planning hierarchy; are to be further developed; and specifically implemented to unlock more complicated infill, vacant, underutilised and Brownfield sites, etc.
- 2.11 It is projected that the above mentioned, NPF policies of “Design-led Standards” and “Performance-based outcomes,” need to culminate at Development Plan, Local Area Plan and at Planning Decision Making level, in the formulation of “new planning mechanisms” under which complicated sites can be assessed, solutions found, flexibility to development management and zoning provisions be applied, and “Well-Designed High-Quality Outcomes” be reached and developed.

3.0 REGIONAL PLANNING CONTEXT

Regional Spatial & Economic Strategies

- 3.1 Under the now statutory National Planning Framework 2018-2040, and its full legislative footing in which it is provided that each of the three national spatial regions, and their associated Regional Assemblies are to prepare their own strategy in accordance with the Framework set by the NPF. These strategies are being completed in early 2019 and will be known as Regional Spatial and Economic Strategies, which will replace the now lapsed Regional Planning Guidelines for the then seven national regions. The Regional Spatial and Economic Strategies will be followed in the planning hierarchy by County and City Development Plan and Local Area Plans and are proposed for completion in early 2019.

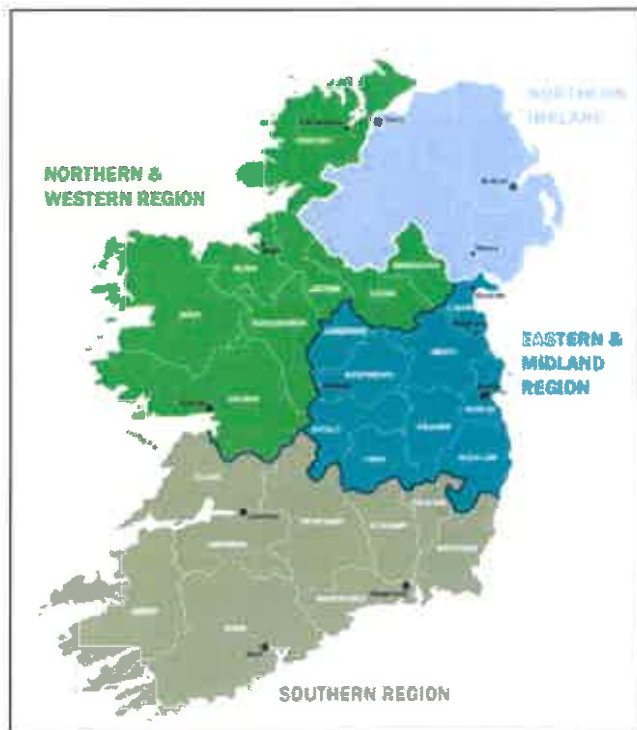


Fig.4 Irelands regional Assembly Areas and Northern Ireland. (Source: Fig. 3.1, NPF 2018-2040, 2018)

- 3.2 These strategies will provide regional level strategic planning and economic policy in support of the implementation of the National Planning Framework and provide a greater level of focus around the National Policy Objectives and National Strategic Outcomes of the NPF.

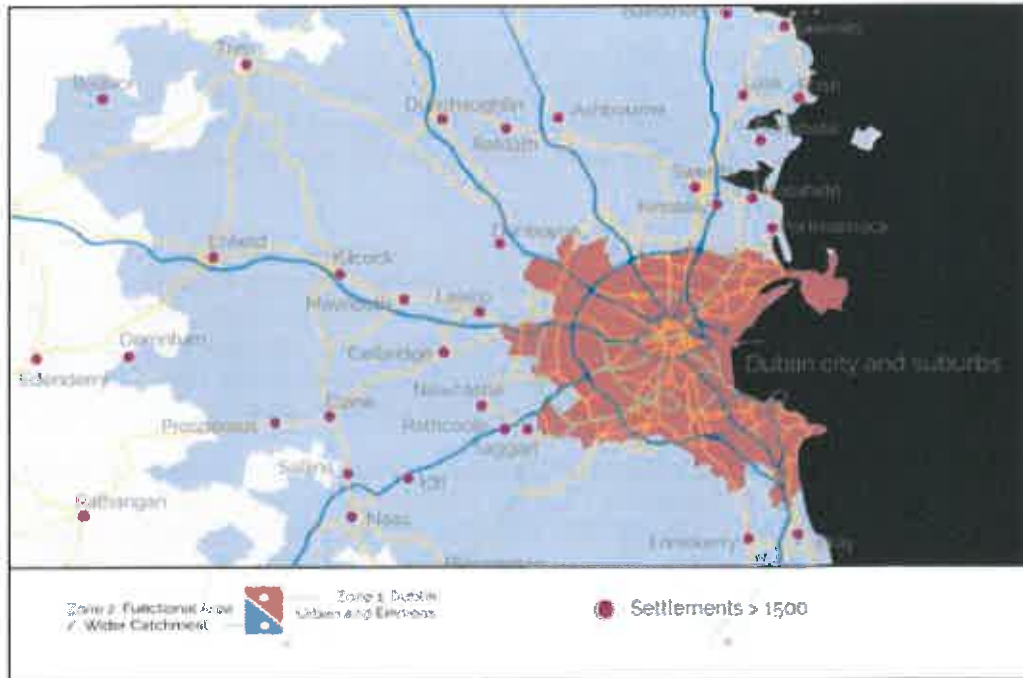


Fig. 5: Gateways | Hubs Development Index 2012 (Source: Dublin Gateway Report, May 2013)

Gateways | Hubs Development Index 2012 - A Review of Socio-Economic Performance

- 3.3 The Gateways and Hubs Development Index, Dublin Gateway Report was done as a review of the existing development status of the regions and in anticipation of these future Regional Spatial & Economic Strategies.
- 3.4 The Dublin gateway is divided into two zones Zone 1 – Dublin Urban Environs and Zone 2- Functional Area/Wider Catchment. Zone 1 reflects the urban cores, and Zone 2 consists of the wider Gateway catchment or functional area, where in excess of 20% of the residents in employment commutes to the urban core (Zone 1) to work. The Zone 2 areas may extend beyond the administrative boundaries of each Gateway settlement.

4.0 REGIONAL PLANNING CONTEXT

- 4.1 As noted above following the publication of the National Planning Framework (NPF) each region is required to develop and adopt a Regional Spatial & Economic Strategy (RSES.) and all County Development Plans and Local Area Plans must be consistent with the RSES.

- 4.2 In order to allow each county to align the timeframe for their statutory plans with the relevant RSES, the Planning & Development (Amendment) Act 2018 has been enacted and contains a provision that requires Planning Authorities to pause the statutory review process where it is in progress or to vary adopted plans immediately following adoption of the relevant RSES.
- 4.3 Meath County Council started the review of the current, and still enforce, Meath County Development Plan 2013-2019, end 2016 and while they have progressed through the initial public consultation process, initial submissions, and managers' report to the point where they were about to publish the new draft plan in middle 2018, it is now on hold.
- 4.4 This development plan review process was effectively overtaken, the National Development Framework (NDP) followed by the Regional Eastern & Midland Regional, Spatial & Economic Strategy (RSES) process. Given that the RSES strategy supersedes the development plan along with the new legal provisions noted above, the council decided to delay publication of the new Draft Meath County Development Plan 2019-2025 until the RSES is adopted.
- 4.5 The Eastern & Midland Regional Assembly prepared the Eastern & Midland Regional, Spatial & Economic Strategy (RSES) along with an Environmental Report in accordance with the SEA Directive and the Planning and Development (Strategic Environmental Assessment) Regulations S.I. No. 436/2004 (as amended), as well as a Regional Flood Risk Appraisal Report and a Natura Impact Report (to inform the Appropriate Assessment) in accordance with Article 6 of the Habitats Directive, the Planning and Development Act 2000-2018, and the European Communities (Birds and Natural Habitats) Regulations S.I. No. 477/2011 (as amended). The strategy and assessment reports were then put on public display 5th November 2018 to 23rd January 2019.
- 4.6 The Draft RSES is a strategic plan which identifies regional assets, opportunities and pressures and provides appropriate policy responses in the form of Regional Policy Objectives. At this strategic level, it is meant provides a framework for investment to better manage spatial planning and economic development throughout the Region.
- 4.7 The RSES is proposed to manage future growth and ensure the creation of healthy and attractive places to live, work, study, visit and invest in. Economic Strategy – that builds on our strengths to sustain a strong economy and support the creation of quality jobs that ensure a good living standard for all. It is effectively proposed as a Metropolitan Plan to ensure a supply of strategic development areas for the sustainable growth and continued success and competitiveness of the Dublin metropolitan area and its Investment Framework. It is meant to assist to prioritise the delivery of key enabling infrastructure and services by government and state agencies. The strategy also includes a Climate Action Strategy to accelerate climate action, ensure a clean and healthy environment and to promote sustainable transport and strategic green infrastructure.
- 4.9 It is submitted it is important to recognise that the Pause of the Meath County Development Plan process, while warranted in this case, has certain likely implication for the validity of the public and strategic environmental assessment

that accompanied it. These implications should be clarified by the Assembly and clearly stated in the draft strategy when adopted. It is contended that when the RSES, SEA and AA are adopted and published they will have significantly changed the policy, environmental data and context, within which a future county development plan would be undertaken.

- 4.10 In particular, given that the E & M RSES supersedes and has statutory governance over the future any future Meath County Development Plan and brings significant change to both statutory and environmental context through its SEA, AA and Flood Risk Assessment based on the "plans and projects" (as defined by EU Directive) that its conclusions establish, it is contended that the public participation and SEA scoping context, that was initially taken account of for the review of the Meath County Development Plan 2013-2019 has significantly changed.
- 4.11 It is strongly contended that in this changed policy and environmental context, that the pre-publication public consultation phase for the review of the Meath County Development Plan will have to be re-opened, to maintain the integrity of both public participation process and the SEA assessment process.
- 4.12 It is cautioned that while the temptation would be there to continue with the Meath County Development Plan from where it was left off, that the preceding public consultation would be compromise as the public would not have had access to adequate policy and environmental information to inform them of the relevant issues, "plans and projects" and environmental data that the new plan will now be based upon. It is critical to note that any pre-supposed position that the competent authority may have taken as to "plans or projects" contained in a draft county development plan would severely compromise the "adequateness" by the legal definition of both the "environmental information" available at the time of taking this position and as to the public's ability to properly consult.
- 4.13 It is requested that the Assembly recommend that the pre-publication phase of the review of the Meath County Development Plan 2013-2019 be reopened to allow submission taking account of the changed policy context, environmental data and environmental assessment findings what that will be produced by the E&M RSES is adopted.

5.0 DRAFT EASTERN & MIDLAND REGIONAL, SPATIAL & ECONOMIC STRATEGY (RSES), 2019-2031

- 5.1 The draft Eastern & Midland Regional, Spatial & Economic Strategy (RSES), 2019-2031 states:

"North Western Corridor (Maynooth/Dunboyne commuter line and DART expansion programme) There are strategic development opportunities along the Dunboyne/M3 Parkway commuter line to drive economic growth at the Dublin Enterprise Zone in Blanchardstown and for significant residential growth at Hansfield SDZ lands along with the sequential development of lands in Dunboyne and Dunboyne north, which is served by the M3 Parkway Station" (Strategic Corridors Include, Draft E&M RES 2019-2031, 70p).

- 5.2 It is submitted that the draft E&M RSES 2019-2031, refers to the underlying realities of spatial planning corridor development theory, which is founded on the axle theory of interaction between two significant nodal points (locally referred as gateways) along an axis, often case a transport axis. It is considered that landuse densification along such an axis is scientifically founded in accordance with spatial development theory (also called regional economic development theory).
- 5.3 It is submitted that while it is welcomed that the above principles are recognised by the draft E&M RSES, the strategy also needs to directly identify and recognise development land-use corridors along recognised transportation corridors and described development guidelines to lead densification directly along these routes. The failure of past policy documents is that while they make reference to spatial planning terms, they fail in providing actual facilitating policies, objectives and mechanisms through which densification along the corridor can be developed.
- 5.4 In this context, it is submitted that a far more pragmatic approach needs to be followed where a corridor such as the “Ashbourne, Ratoath & Dunshaughlin with Dunboyne / Clonee / Pace Corridor” is identified, and direct objectives are developed, followed by specific development criteria and an actual proposed development mechanism is proposed to directly guide future development and planning applications. It is clear from past policy documents that aspirational use of terminology such s clusters, gateways and corridors have had little to no effect on the actual implementation of sustainable economic urban development built-form.
- 5.5 In this context, it is proposed that the “Ashbourne, Ratoath & Dunshaughlin with Dunboyne / Clonee / Pace Corridor” is recognised as a land-use development corridor, along which densification and intensification of land-use are proposed, and that it is proposed that a corridor development plan (a local area plan or ideally, a “linear” Strategic Development Zone(SDZ) used to implement it. It is only through a SDZ or LAP that direct criteria, and zoned development structure can be set to lead the decisions on planning permission directly.
- 5.6 It is submitted that vacant, underutilised, Brownfield and infill Green and Brownfield sites along the mentioned corridor should be considered for suitability of densification through a suitable mechanism, from where they can be guided by the RSES, and in turn by the County Development Plan, Strategic Development Zone (SDZ) plans, and Local Area Plans towards increased densification along the corridor.
- 5.7 The concept of flexibility is strongly supported by the National Planning Framework, 2018 under National Policy Objective 13 which states.

“In urban areas, planning and related standards, including in particular building height and carparking will be based on performance criteria that seek to achieve well-designed high quality outcomes in order to achieve targeted growth. These standards will be subject to a range of tolerance that enables alternative solutions to be proposed to achieve stated outcomes, provided public safety is not compromised and the environment is suitably protected” (Section 4.5 Achieving Urban Infill/ Brownfield Development, Project Ireland 2040- National Planning Framework, 2018, p.65).

It is submitted that the E & M RSES must include these principles as part of its policies, consistent with the NPF. It is exactly this kind of flexible approach related to development standards subject to performance criteria that can provide a practical mechanism for resolving complicated infill or vacant sites.

- 5.8 The RSES states regarding the North Western corridor (Maynooth/Dunboyne commuter line) and the Dunboyne/M3 Parkway commuter line that economic development will be driven at the Dublin Enterprise Zone, and residential development at Hansfield SDZ and then goes on to support sequential development of lands in Dunboyne and Dunboyne North. While this land-use corridor development should indeed be sequential as a basic planning principle, it should, however, be directly directed by a "planning structured plan" applied on both sides of the transportation axis, according to density, land use, design, height and scale along with flexible application of zoning and lands use management criteria, subject to adequate environmental assessment.

"North western Corridor (Maynooth/Dunboyne commuter line and DART expansion programme) ... Along the main line, the proposed electrification to Maynooth will open opportunities for sequential growth in Leixlip and Maynooth, with an estimated completion date of 2027.

"A number of sustainable transport projects will also be delivered within the period to 2027. The delivery of key infrastructure is a significant change parameter to drive increased metropolitan densities and this has been factored into the clustering and prioritisation of strategic development areas, based on their accessibility to high quality rail based public transport corridors, (Strategic Corridors Include," Draft E&M RES 2019-2013, 68 p.)

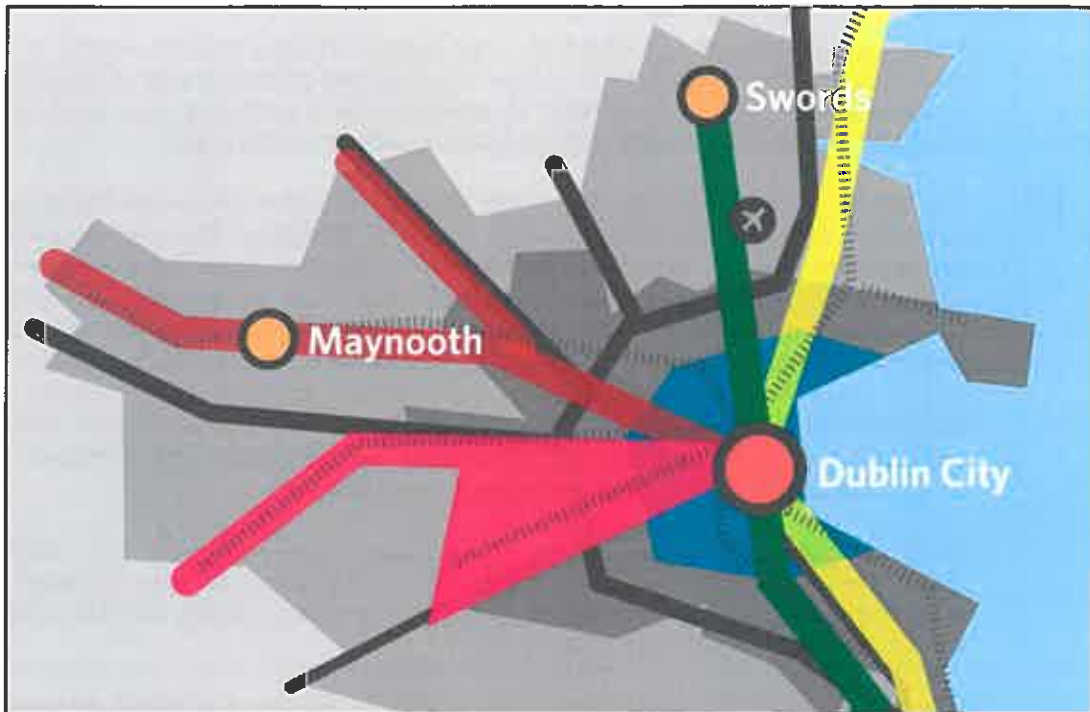


Fig.5.1 Dublin Metropolitan Area Strategic Plan: Maynooth/Dunboyne line (DART expansion) Strategic development areas along the Dunboyne/ M3 parkway commuter line include the Dublin Enterprise Zone and Hansfield SD

5.9 It held that the draft RSES should adopt mechanism that would facilitate, high-quality development solutions consistent with the “Design-led Standards” and “Performance-based outcomes” that the NPF 2018 directs as the statutory superior planning policy document. In particularly the NPF’s recognition that development of Infill and Brownfield developments located are more challenging to deliver due to land management and community resistance against new developments. These practical development mechanisms are particularly relevant to sites located with or along public transport corridors, such as the Dunboyne/Clonee area.

“To enable brownfield development, planning policies and standards need to be flexible, focusing on design led and performance-based outcomes, rather than specifying absolute requirements in all cases. planning standards should be flexibly applied in response to well-designed development proposals that can achieve urban infill and brownfield development objectives in settlements of all sizes. ... general restrictions on building height or general restrictions... should be replaced by performance-based criteria ... e.g. city/town centre, public transport hub, inner suburban, public transport corridor, outer suburban, town, village etc” (Section 4.5 Achieving Urban Infill/ Brownfield Development, Project Ireland 2040- National Planning Framework, 2018, p.65).

- 5.10 The strategy further indicates, with regard to key towns that future urban development should be achieved through infill development and renewal and regeneration of underused, vacant lands. It is submitted that low density residential development in Meath and in the Dunboynel, Clonee, are among other causes, also significantly caused by the fragmentation and waste-age of perfectly useable portions of land, left over from land division, land sales, remnants cut off from pervious parcels of land or isolated from its former use through the development of roads or services.

"A significant proportion of future urban development should be accommodated on infill/brownfield sites by encouraging development, including renewal and regeneration of underused, vacant or derelict town centre lands for residential development to facilitate population growth," (Section 4.6 Key Towns Draft E&M RES 2019-2013, 52 p.)

- 5.11 It is submitted that fragmentation of available land is an issue that has been overlooked by regional and local planning policies. Award land parcels are often disregarded because of perceived obstacles such as "too small," "too little value on its own," "too awkward of shape" and "not correctly zoned" or other. The potential of the lands can often be unlocked by simply removing some policy barriers or with creative land deals and development solutions. The combined effect of bringing numerous smaller pieces of land, "restant"-plots, or remnants of properties back into development stock can significantly increase densification and intensification of land use in, or around existing urban areas.

- 5.12 The draft RSES Strategy indicates that some hinterland areas have emerged as residential satellite towns such to Dublin and in themselves do not have significant economic enterprises. It is considered that while it is a sound planning principle to seek a mix of land use at all locations, it is often not possible in the face of much larger economic realities. In the case of Dublin, it is unrealistic to believe that the high economic functionality can be replicated at a number of other locations. In this context, it may be more appropriate to allow specialisation of a predominant land use fat certain locations, to instead strengthen those land-uses to allow them to do what they do well, even better.

"Some areas and towns have in the last 20 years emerged mainly as commuting towns, with a weak level of services and functions for their resident population. These areas are heavily reliant on their accessibility to the metropolitan area for their workforce and for education. Towns where over half of all trips to work or education are to Dublin's urban core include Donabate, Skerries, Rush, Lusk, Dunboyne, Celbridge, and Ratoath" (Hinterland Area, Draft E&M RES 2019-2013, 29 p.)

- 5.13 It is submitted that the Dunboyne/Clonee settlements along the M3 road transportation corridor, with its extremely high accessibility are one of those satellite residential areas where it may be more appropriate to focus on strengthening their main land-use functionality, i.e. commuter residences for people working in the city.
- 5.14 The RSES strategy strongly promotes the use of the spatial planning and land-use principle of sequential development or the secession of land use, where the rational and most sustainable position is to develop the very next site location following on from an existing developed urban area. The underlying premise of this principle of development is that sequential development, allows for sustainable use of land as a scarce resource and allows for rational investment on the extension of services.

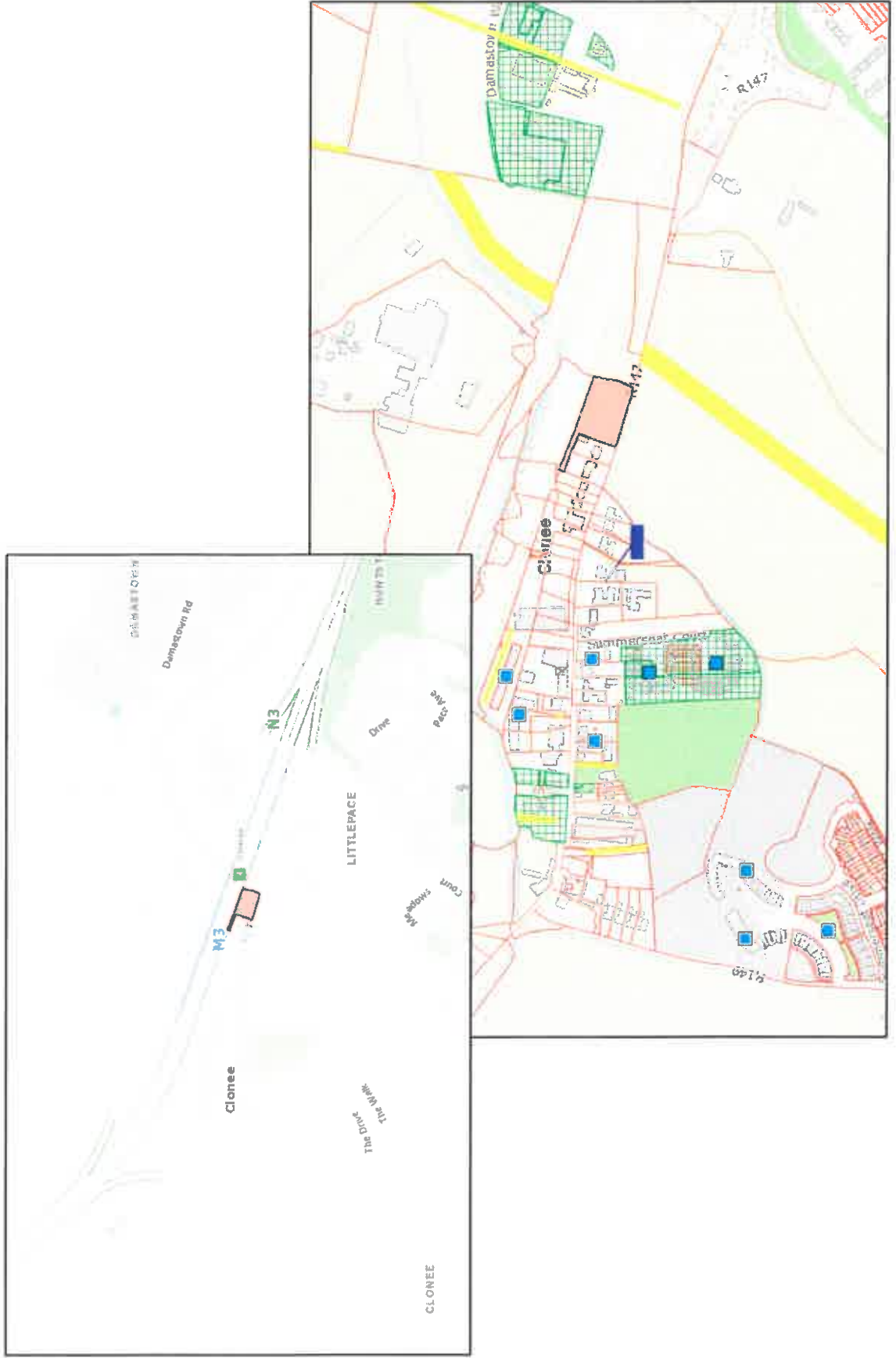
"It is therefore considered appropriate that the MASP is focussed on the phased and sequential delivery of a steady stream of sites to meet demand including the identification of long term strategic future development areas", (Phased sequential development, Draft E&M RES 2019-2013, 28 p).

- 5.15 It is important that this powerful land-use principle is recognised as a principle applicable to all land-use scenarios and not be arbitrary identified as only applying in strategic or large-scale development context. The applied scientific position, e.g. the spatial planning position is that it can be applicable to a site to site scale, a suburb to suburb or even an urban area to urban area scale.

Yours Faithfully,

Louis Wildenboer
Senior Planner

ANNEXURE: Infill Property(0.8 acres) at Dunbooyne Clonoe, Co. Meath



Yours Faithfully,

Louis Wildenboer
Senior Planner