

Inspector's Report PL07.247985

Development Change of use from a previously

permitted warehouse distribution/ light industrial unit to retail warehouse and

extension of unit to mezzanine, together with minor alterations to

access junction onto N18.

Location Unit 2, Westlink Commercial Park,

Carrowmoneash, Oranmore, Co.

Galway.

Planning Authority Galway County Council

Planning Authority Reg. Ref. 16/1283

Applicant(s) Oaklawn Developments Limited

Type of Application Permission

Planning Authority Decision Refuse permission

Type of Appeal First Party

Appellant(s) Oaklawn Developments Limited

Observer(s) None

Date of Site Inspection 12th May 2017

Inspector Donal Donnelly

1.0 Site Location and Description

- 1.1. The appeal site is located within the Westlink Commercial Park in the townland of Carrowmoneash, Oranmore, Co. Galway. Westlink Commercial Park is situated immediately to the east of the Carrowmoneash Roundabout. The northern and eastern arms of the roundabout comprise of part of the N18 national primary route and the western arm (R446) provides access to Galway City Centre. The southern arm accesses Oranmore village, with Main Street at a distance of approximately 550m from the roundabout.
- 1.2. There are four sets of units within the commercial park, most of which are occupied by warehousing and enterprise type uses. Occupants include Delta Security Group, Footfall Ltd (carpet tile providers), Harold Engineering Ltd (air compressors, garage equipment, fume extraction), Electrical Mechanical Controls, Avantech B+B Smartworx and Hafele Trade Partner. Unit's 3 and 4 adjoining the appeal site are occupied by Event Bars (drinks and bar hire) and Incision (signage solutions).
- 1.3. The subject unit is the closest to the site access. The site area is given as 0.12 hectare and the stated gross floor area of the unit is 523.83 sq.m. There is car parking to the front of Units 2-4 and to the side of Unit 2.
- 1.4. The appeal site also includes the access junction to Westlink Commercial Park. This T junction is located off the eastern side of the northern arm of the roundabout. The centre point of the access is approximately 50m from the yield line for motorists approaching the roundabout. The junction has wide radii on both sides to accommodate HGV's.

2.0 **Proposed Development**

- 2.1. Planning permission is sought for revisions to a previously permitted warehouse distribution/ light industrial unit (Reg. Ref: 72375) to facilitate a retail warehouse. The proposal consists of the following:
 - Change of use from warehouse distribution / light industrial use to retail warehouse use at ground floor;
 - Change of use at mezzanine level from office to retail warehouse;

- Extension to mezzanine to facilitate the proposed retail warehouse use;
- New signage;
- Minor alterations to the existing N18 access junction, together with all associated site works and services. (Gross floor space of proposed works 190.32 sqm.)

3.0 Planning Authority Decision

3.1. **Decision**

- 3.1.1. Galway County Council issued notification of decision to refuse permission for the proposed development for three reasons.
- 3.1.2. Under the first reason, the Planning Authority has serious traffic safety concerns, as sightlines for right turning motorists from the site would be severely compromised during periods when stationary traffic on the N18 is backed up from the Carrowmoneash roundabout to the site entrance. It is therefore considered that the additional traffic movements generated by the proposed development would interfere with the safety and free flow of traffic on the national route.
- 3.1.3. The second reason states that the proposal would adversely affect the use of a national route by traffic and would materially contravene Objective TI6 of the Development Plan. It is also considered that the proposal would establish an undesirable precedent for retail activity at this location.
- 3.1.4. It is stated within the final reason for refusal that the applicant has not adequately addressed the car parking requirements for the proposed development.

3.2. Planning Authority Reports

3.2.1. Under the assessment of the application, reference is made to the Retail Planning Guidelines, 2012 which state that in general, there should be a presumption against further development of out of town retail parks. It is also noted that units of less than 700 sq.m. are more capable of being accommodated in urban centres, whilst very large units in excess of 5,000 sq.m. focused on a specific market segment, can have an unacceptable local monopoly effect on smaller shops in town centres. The

- proposed development, at 714 sq.m., is just above the 700 sq.m. referred to in the Guidelines and is considered more appropriate to town centre locations.
- 3.2.2. There are also concerns regarding the principle of the proposed retail warehouse use at a location off the national route and in such close proximity to a heavily trafficked roundabout. It was stated that sightlines (70m) are deficient and traverse the national road. Visibility to the south-west will not be available when cars are backed up at the roundabout. In addition, the provision of only 13 no. car parking spaces is considered to be severely deficient.
- 3.2.3. In terms of visual impact, it is noted that the building will remain predominantly the same but signage proposals are considered excessive in scale.
- 3.2.4. Refusal of permission was recommended for the reasons included in the Council's Decision. A recommended reason for refusal regarding the absence of details on wastewater disposal and the Planning Authority's obligations under the Habitats Directive was omitted, as there is connection to public mains drainage.
- 3.2.5. The Acting Director of Services commented in the final Planner's Report that the proposal would establish and undesirable precedent for retail activity at this location where industrial/ commercial zoned lands are in short supply. It is also noted that there is adequate land zoned for Commercial (C2) uses to the west of the subject site on which such development can be reasonably accommodated.
- 3.2.6. Reference is also made to the frequent backlog of traffic using the N18 as a result of both the railway crossing and the under capacity of the roundabout. It is stated that the creation of additional turning movements is a source of some concern, notwithstanding the somewhat doubtful assertion that the development would only create 11 additional traffic movements in peak hours.
- 3.2.7. The application was placed on extension of time and the applicant submitted additional information that has been considered. However, refusal of permission is recommended.

3.3. Prescribed Bodies

3.3.1. Transport Infrastructure Ireland consider that the proposed development is at variance with official policy in relation to the control of development fronting/ affecting

national roads. It was recommended that a Traffic and Transport Assessment and a Road Safety Audit be carried out.

4.0 **Planning History**

Galway County Council Reg. Ref: 02/1218 (PL07.201893)

- 4.1. The Board upheld the Council's decision and refused permission for construction of a 3-storey office block and 4-storey mixed use building and change of use for units 12,16 and 17.
- 4.2. It was stated under the reason for refusal that the proposed development would be premature pending the determination by the road authority of a road layout and associated traffic facilitation works for the area.

Galway County Council Reg. Ref: 08/2875 (PL07.233809)

- 4.3. The Board overturned the Council's decision and refused permission for the construction of 2 no. commercial buildings containing 8 no. retail warehousing units, 3 no. warehousing units and 22 no. office units, together with modifications to the existing business park entrance, car parking and signage on the site immediately to the south and west of the subject unit in Westlink Commercial Park.
- 4.4. Under the first reason for refusal, it was stated that the additional traffic generated by the proposal would endanger public safety by reason of a traffic hazard having regard to the location of the access at the junction of the N6 and N18.
- 4.5. The second reason stated that the proposal would adversely affect the use of the national road by traffic and would contravene a policy of the Galway County

 Development Plan, 2009-2015 to protect the significant investment made in strategic economic infrastructure, in particular, the network of national roads.
- 4.6. The final reason refers to the proposed land use mix, scale and unit sizes and the location of the proposed development. The Board was not satisfied that the proposal would not constitute urban edge sprawl, which would adversely affect the viability of Oranmore town centre.

Galway County Council Reg. Ref: 11/90

- 4.7. Permission granted for retention of change of use from storage to additional office space on the first floor of Unit 2 and permission for signage on the front and side of Unit 2, and for one internal park sign (gross floor space 100.8sqm)
 - Galway County Council Reg. Ref: 15/809
- 4.8. An application for revisions to the permitted warehouse distribution/ light industrial unit to facilitate a retail warehouse at Unit 2 was withdrawn.

5.0 Policy Context

5.1. Oranmore Local Area Plan, 2012

- 5.1.1. The site is zoned Business & Enterprise (BE), where the objective is to "promote the development of business and enterprise uses, light industry/ warehousing and the facilitation of enterprise park/ office park type uses to include incubation/ start-up units and Small Medium Enterprises, on suitable lands with adequate services and facilities and with a high level of access to the major road/ rail networks and to public transport facilities."
- 5.1.2. With respect to enterprise, retail and services, it is stated in the LAP that "the Town Centre/Commercial (C1) and Commercial/Mixed Use (C2) zoned lands provide for a range of suitable retail and service facilities throughout the town, which protect the vitality and viability of the town centre, while providing a strong base for employment opportunities. There are also Business/Enterprise (BE) lands available which can facilitate a variety of enterprise and business type uses."
- 5.1.3. Economic development policies and objectives are set out in Section 3.4.
- 5.1.4. Policies and objectives for sustainable transportation and roads, streets and parking are outlined in 3.5.2.
- 5.1.5. There is a specific transport objective for the N18 north of the roundabout (TI30 Provide for Dual Carriageway and Pedestrian Facilities).

5.2. Galway County Development Plan, 2017

- 5.2.1. Oranmore is identified as a one of a number of Key Towns within the County where the objective (SS5) is to "support the development of the key towns of the County as outlined in the Core Strategy and Settlement Strategy in order to sustain strong, vibrant urban centres which act as important drivers for the local economies, reduces travel demand and supports a large rural hinterland, while providing a complementary role to the hub town of Tuam and the smaller towns and villages in the County."
- 5.2.2. Policy R3 states that "there shall be a general presumption against large scale retail proposals adjacent to existing, new or planned national roads and interchanges in accordance with the provisions of the DoECLG Retail Planning Guidelines for Planning Authorities, 2012 (and any updated/superseding document).

5.3. Natural Heritage Designations

5.3.1. The Galway Bay Complex SAC is approximately 370m to the south-east of the site boundary and the Inner Galway Bay SPA is approximately 730m to the south-west. The Cregganna Marsh SPA and NHA is 2.4km to the south of the site.

6.0 The Appeal

6.1. Grounds of Appeal

- 6.1.1. A first party appeal was lodged against the Council's decision on behalf of the applicant. The grounds of appeal and main points raised in this submission can be summarised as follows:
 - Planning Authority has issued a recommendation to refuse permission for roads and traffic related reasons, contrary to the recommendations of the Council's Roads & Transportation Section.
 - Retail warehousing >700 sq.m. is open for consideration within the Business
 & Enterprise zoning applicable to the site 714 sq.m. floor area exceeds the minimum floorspace requirement.

- Proposal provides for viable commercial use which will serve to revitalise and reutilise this established commercial unit.
- Proposed use within this BE zone is totally unrelated to the availability of commercial/ industrial zoned lands in the area.
- Retail warehousing is also open for consideration within Commercial (C2)
 zoning and there is no indication that it is preferred within this zoned over BE zoning.
- There are no units within the C2 zone to the west that could cater for the proposed development.
- DM Standard of the Development Plan relates to new entrances when subject entrance to Westlink Commercial Park is well established.
- Existing commercial park is accessed onto an urban road and a sightline provision of 60m to the south exceeds the requirements of NRA TD41-42 and is therefore compliant with DM Standard 20 of the Development Plan.
- Entrance to commercial park was designed in accordance with local authority requirements and more intensive development has been permitted in the past to use this entrance (including a 51 bed hotel).
- Modest development proposed would not endanger the capacity of the junction nor will it generate a significant increase in right hand turns exiting the commercial park.
- Capacity figures used in TTS were based on the existing unit being vacant
 and proposed development would not result in a significant increase
 compared to existing and permitted uses on site there is nothing to prevent
 the existing unit from being occupied as a labour intensive warehouse and
 distribution centre.
- Nature of the proposed use is likely to generate more staggered traffic movements throughout the day and higher levels at the weekends.
- Formal provision of a yellow box would greatly assist visibility for vehicles exiting the commercial park who wish to turn right.

- Vehicles wishing to head north have the option of using the roundabout to the south to continue north.
- Existing N18 will be downgraded once the new M17/ M18 motorway is opened (November 2017) and this will provide significant traffic relief adjacent the appeal site.
- Opening time for the new M17/ M18 will coincide with the earliest possible timeframe for the proposed retail warehouse to commence operations.
- Spatial Planning and National Roads Guidelines are not applicable in this
 case, as the subject access onto the N18 is located within the 60kph speed
 limit. Objective TI6 is also not relevant and the proposal does not therefore
 materially contravene this objective.
- Purpose of the BE zoning is to, inter alia, promote the development of business and enterprise uses with a high level of access to the major road/ rail networks and to public transport facilities – proposed modestly scaled retail warehousing, to avail of the adjoining national road network, is specifically supported by the BE zoning.
- There is no car parking standard for retail warehousing in the County
 Development Plan or Local Area Plan and it would therefore seem
 unreasonable to refuse permission in the absence of a relevant standard.
- Neighbouring City Development Plan requires 1 car parking space for 70 sq.m. of gross floor area for retail warehousing using this standard, the proposal would require 10 no. spaces and 13 no. are being provided.
- It is stated under Development Plan DM Standard 22 that "in assessing applications for change of use or for replacement buildings within towns and villages, an allowance will be given for former site use in calculating the car parking requirements generated by the new development." Existing use allows for 11.6 car parking spaces.
- TTS estimates 5.86 trips during AM peak and 10.5 trips during PM peak 13
 no. spaces will exceed the anticipated peak volume of car trips.
- There is a shared parking arrangement within the commercial park and there is a high degree of underutilised car parking, especially at weekends.

Board's reasons for refusing permission on neighbouring site (PL07.233809)
 do not apply in the current case

6.2. Planning Authority Response

6.2.1. No response

7.0 Assessment

- 7.1. In my opinion, the main issues to be addressed in this appeal are as follows:
 - Development principle;
 - · Traffic impact;
 - · Retail impact; and
 - Appropriate Assessment.

7.2. Development principle

- 7.2.1. The appeal site is zoned for Business and Enterprise uses within the Oranmore Local Area Plan, 2012-2018, where the objective is to "promote the development of business and enterprise uses, light industry/warehousing and the facilitation of enterprise park/office park type uses to include incubation/start-up units and Small Medium Enterprises, on suitable lands with adequate services and facilities and with a high level of access to the major road/rail networks and to public transport facilities."
- 7.2.2. Comparison shops and large scale convenience/ comparison centres are not normally permitted in the BE zone. Warehousing (retail/ non-food bulky <700 sq.m.) and Warehousing (retail/ non-food/ bulky household goods 700-5,000 sq.m.) are open for consideration.
- 7.2.3. It is stated in the Local Area Plan that "a use that is classified as Open for Consideration is one that the Local Authority may permit where it is satisfied that the suggested form of development will be compatible with the policies and objectives for the zone, will not conflict with permitted uses and conforms to the proper planning

- and sustainable development of the area, including the policies and objectives set out in the Local Area Plan."
- 7.2.4. In deciding if the proposed use is compatible with the policies and objectives for the BE zone, consideration should be given to Objective ED 3 Business/Enterprise & Industrial Development which seeks to "facilitate and encourage the establishment of business/enterprise and industry uses, which are considered compatible with surrounding uses, on suitably zoned sites. Where such uses are developed adjacent to residential areas and community facilities, buffer zones shall be provided as well as adequate screening in the form of planting and landscaping, as appropriate."
- 7.2.5. Notwithstanding the fact that the proposed change of use is open for consideration within BE zoning, I would not be entirely satisfied that retail warehousing is compatible with the existing surrounding uses within the commercial park. Existing units are occupied by business and enterprise uses, light industry/warehousing and enterprise park/office park type uses. The proposed change of use would see the introduction of a new use that would generate different impacts in terms of traffic and retail, (addressed in more detail below).
- 7.2.6. I would also have concerns that the proposed change of use would set a precedent and lead to a reduction in the availability of suitable lands for incubation/start-up units and small medium enterprises. In this regard, it should also be noted that Westlink Commercial Park represents the only parcel of BE zoned land, comprising just 3.47 hectares (0.49%) of the 704.9 hectares of total zoned land within the Oranmore Local Area Plan. I would therefore share the Council's concerns outlined in the second reason for refusal that the proposal would establish an undesirable precedent for retail activity given the zoning objective that applies at this location.

7.3. Traffic Impact

7.3.1. The Planning Authority has concerns, as expressed under the first reason for refusal, that sightlines are contrary to DM Standard 20, and would be severely compromised for right turning movements from the site when traffic is backed up from the roundabout to the site entrance. It is therefore considered that the additional traffic movements generated by the proposed retail warehousing use would interfere with the safety and free flow of traffic on the national road. It is also considered under the

- second reason for refusal that the proposal would materially contravene

 Development Plan Objective TI 6 which seeks to protect the capacity and safety of
 the National Road Network. The third reason for refusal states that the applicant has
 not adequately addressed the car parking requirements for the proposed
 development.
- 7.3.2. From the outset, it should be noted that the proposed M18/ M17 Gort to Tuam motorway is expected to open to traffic in early 2018. This will result in the N18 at the location of the appeal site entrance being downgraded to a regional road. Notwithstanding this, the site entrance is situated within the 60 kph speed limit and therefore I would be in agreement with the appellant that Objective TI 6 does not apply in this case. Objective TI 6 states that "it is an objective of the Council to protect the capacity and safety of the National Road Network and Strategically Important Regional Road network (listed in DM Standard 19) in the County and ensure compliance with the Spatial Planning and National Roads Planning Guidelines (2012). Galway County Council will not normally permit development proposals for future development that include direct access or intensification of traffic from existing accesses onto any national primary or secondary road outside of the 50-60 kph speed limit zone of towns and villages."
- 7.3.3. It should also be noted that the Spatial Planning and National Roads Guidelines, 2012 sets out planning policy considerations relating to development affecting national roads (including motorways, national primary and national secondary roads) and associated junctions outside the 50/60 kph speed limit zones for cities, towns and villages. Non-national roads where these Guidelines may be applied also concern stretches outside the 50-60 kph speed limit zones.
- 7.3.4. Notwithstanding the above, there may still be traffic safety concerns regarding the potential for intensification of the site access onto to a heavily trafficked section of road in close proximity to the roundabout. Furthermore, I would be in agreement that the issue of parking has not been fully resolved.
- 7.3.5. In terms of the availability of sightlines, I observed from my site visit that traffic was beginning to back up on the approach to the roundabout at approximately 6pm on Thursday 11th May, a day when the weather was fine. Whilst there was no actual queuing for any length of time, I would be in agreement that traffic approaching the

roundabout could interfere with the available sightline to the left hand side for emerging right-turning motorists from the commercial park access. The appellant suggests that a yellow box could be installed on the N18 at the location of the access to facilitate a gap in the traffic for emerging right-turning motorists; however, I would still be of the opinion that any intensification of the use of this junction could give rise to a significant traffic hazard. In this regard, I observed the following morning a vehicle exiting the roundabout and braking sharply when the vehicle in front began to perform a right turn manoeuvre into the site. This is compounded by the fact that the access to the site is relatively close to the roundabout and there is a natural inclination to accelerate away from a roundabout notwithstanding the 60 kph speed limit at this location. Northbound traffic also backed up onto the roundabout on one occasion during my site visit, when the level crossing 200m to the north of the site was in operation.

- 7.3.6. The appellant makes the point that the proposed change of use will not generate a significant increase in right hand turns exiting the commercial car park. In addition, it is submitted that the proposed use is likely to generate more staggered traffic movements throughout the day and higher levels at the weekend.
- 7.3.7. The potential for intensification is reflected in the car parking standards for the existing and proposed uses. The existing unit has a parking requirement of 12 no. spaces and 13 no. are proposed. The applicant suggests that the standard of one space per 70 sq.m. of retail warehousing could be used in the absence of any parking standards within the Local Area Plan. The appropriate car parking standard should be taken from the County Development Plan where one car space per 18 sq.m. of gross floorspace is required for shops (250-1,000 sq.m. gross). The proposed development with gross floor area of 714 sq.m. would generate a car parking requirement of 40 spaces.
- 7.3.8. Having regard to the above, I consider that the proposed development will give rise to an intensification of use in proximity to a heavily trafficked major roundabout. Moreover, the proposal will set an undesirable precedent for further retail development and associated traffic impacts at this location.
- 7.3.9. There is the contention that the traffic impact of the proposed development could be offset by a reduction is traffic using this section of road when the M18/ M17

motorway opens. However, I consider that this would require reassessment at that time in the form of now traffic surveys, forecasts, etc. In any event, it is likely that this roundabout will remain heavily trafficked given its strategic location. Moreover, it is now generally accepted that the building of more roads does not necessarily relieve traffic congestion in the longer term.

7.4. Retail Impact

- 7.4.1. Warehousing (retail/ non-food/ bulky household goods 700-5,000 sq.m.) is open for consideration with the BE zoning and the C2 (Commercial/ mixed use) zoning within the Oranmore Local Area Plan. There are 11.99 hectares of C2 zoned land within the Local Area Plan boundary. It should be noted that non-food retail warehousing with gross floor area of 700 sq.m. is also open for consideration the C1 Town Centre/ Commercial zoning. The proposed retail warehousing unit will have a floor area of 714 sq.m.
- 7.4.2. It is an objective of the Local Area Plan (ED 4) to "support the development of appropriate types, scales and patterns of retail development in suitable locations within the town and with high quality designs that:
 - Comply with the Guidelines for Planning Authorities Retail Planning 2012 (and any updated/superseding document), including the need for a sequential test and the Retail Design Manual – A Good Practice Guide Companion Document to the Guidelines for Planning Authorities.
 - Support the vitality and viability of the existing town centre and associated main streets.
 - Protect investment in strategic roads and infrastructure and that are easily accessible, particularly in terms of public transport.
 - Contribute to the creation of a high quality retail environment.
- 7.4.3. The Town Centre (C1) zoning will remain the primary focus for the location of new retail development and on Commercial/Mixed Use (C2) zoning where appropriate.

 The Planning Authority will ensure that the location of future retail development is consistent with the key policy principles and order of priority as set out under Section 4.4 to 4.6 of the Guidelines for Planning Authorities Retail Planning 2012 (and any

- updated/superseding document) and will require Retail Impact Assessments, including details of the sequential approach and Design Statements, where appropriate, for retail developments in accordance with the Retail Planning Guidelines and DM Guideline ED1 and ED2."
- 7.4.4. Notwithstanding the above, it is recognised in the Retail Planning Guidelines for Planning Authorities that there are benefits to be gained in grouping retail warehouses in retail parks to minimise car trips and to facilitate the transportation of bulk goods by car at out-of-centre locations. On the other hand, however, it is highlighted that the range of goods being sold from retail warehouse parks often includes non-bulky durables and this can have a detrimental impact on town centres. Furthermore, it is considered that many bulky goods stores can be accommodated in town centres.
- 7.4.5. As noted above, retail warehousing is only open for consideration within the C2 and BE zones and it is not permitted in principle within any Local Area Plan zones. In my opinion, this could be in response to the advice contained within the Retail Planning Guidelines for planning authorities to carefully consider the zoning of land for any additional retail warehousing given the overprovision in recent years and the levels of vacancy in such centres.
- 7.4.6. I have concerns that the proposed development could set an undesirable precedent for the conversion of this business and enterprise zones to a retail park over time. It should also be noted that the development plan does not appear to identify a need for any additional retail warehouses at this location. Indeed, Development Plan Policy R3 states that "there shall be a general presumption against large scale retail proposals adjacent to existing, new or planned national roads and interchanges in accordance with the provisions of the DoECLG Retail Planning Guidelines for Planning Authorities, 2012 (and any updated/superseding document)."

7.5. Appropriate Assessment

7.5.1. The appeal site is located as close as 370m from the Galway Bay Complex SAC and the Inner Galway Bay SPA is approximately 730m to the south-west. The Cregganna Marsh SPA is 2.4km to the south of the site.

7.5.2. Having regard to the nature and scale of the development proposed and to the nature of the receiving environment, namely a urban and fully serviced location, no appropriate assessment issues arise.

8.0 **Recommendation**

8.1. It is considered that the proposed development should be refused for the reasons and considerations hereunder.

9.0 Reasons and Considerations

- 1. The site is zoned for Business and Enterprise uses within the Oranmore Local Area Plan, 2012 where the objective is to "promote the development of business and enterprise uses, light industry/ warehousing and the facilitation of enterprise park/ office park type uses to include incubation/ start-up units and Small Medium Enterprises, on suitable lands with adequate services and facilities and with a high level of access to the major road/ rail networks and to public transport facilities." It is considered that the proposed change of use of a warehouse distribution/ light industrial unit to a retail warehousing unit would set an undesirable precedent for retail activity at this location and would undermine the aims of the zoning objective which seek to encourage incubation/start-up units and small medium enterprises. The proposed development would, therefore, conflict with the policies of the development plan and be contrary to the proper planning and sustainable development of the area.
- 2. Having regard to the location of the site access, in close proximity to a heavily trafficked roundabout, it is considered that the proposed development would endanger public safety by reason of traffic hazard because of the additional traffic turning movements the development would generate at a point where sightlines can be restricted for motorists right turning onto the N18 on occasions when there is a backup of traffic approaching the roundabout. Furthermore, it is considered that the car parking provision for the proposed development would be seriously deficient and would be inadequate to cater for the generated parking demand. The proposed development, by itself or by the precedent which the grant of

permission for it would set for other similar development at this location, would adversely affect the use of a national road or other major road by traffic.

Donal Donnelly Planning Inspector

12th May 2017