

Inspector's Report ABP.302201-18

Development Permission for petrol filling station

Location Arnestown, New Ross, Co. Wexford.

Planning Authority Wexford County Council

Planning Authority Reg. Ref. 20180604

Applicant(s) Petrogas Group Ltd.

Type of Application Permission

Planning Authority Decision Grant

Type of Appeal First Party

Appellant(s) As above

Observer(s) None

Date of Site Inspection 17th October 2018

Inspector Kenneth Moloney

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1.0 Site Location and Description

- 1.1. The appeal site is located on the western outskirts of New Ross, Co. Wexford.
- The appeal site is located adjacent to a local road which takes its access off the N25
 (New Ross Wexford town national primary road).
- 1.3. The northern boundary of the appeal site is slightly removed from the local road.
- 1.4. The size of the appeal site is 1.534 ha (3.78 acres) and the shape of the appeal site is almost square.
- 1.5. The appeal site is largely an agricultural field and the topography of the field slopes upwards gently in a southern direction. The appeal site is elevated relative to the local road.
- 1.6. The New Ross bypass is currently under construction to the east of the appeal site and there is a bridge under construction located to the immediate east of the appeal site.

2.0 **Proposed Development**

- 2.1.1. The proposed development provides for a filling station that includes the following;
 - 4 no. pump islands with canopy over
 - 1 no. pump island for HGV's with canopy over
 - Underground fuel storage tanks
 - Shop building with floor area of 600 sq. metres
 - Outdoor seating
 - External play area
 - Parking for cars, HGV's, coach and bicycles
 - Car wash
 - Landscaping
 - Vehicular access
- 2.1.2. The floor plan of the proposed shop building includes shop / retail sales area, ancillary off licence, food offers (ancillary service areas and drive-thru).

- 2.1.3. The proposed signage comprises of corporate signage on the shop building. The shop signage is generally internally lit.
- 2.1.4. The proposed canopy structure also includes corporate signage. The overall height of the canopy structure is 5.6 metres above ground level. The proposed HGV canopy includes limited signage and this structure is 6.5 metres above ground level.
- 2.1.5. The proposed development also includes a totem signage and the maximum height of this signage is 8.1 metres above ground level.
- 2.1.6. The proposed development includes car parking provision for approximately 116 car parking spaces.

3.0 Planning Authority Decision

- 3.1. Wexford County Council decided to **refuse** planning permission for the following reasons;
 - 1. Due to the nature and scale of the proposed development the proposal would generate significant high volumes of right turning movements on the N25, which would endanger public safety by reason of traffic hazard and obstruction of road users due to the movement of extra traffic generated and therefore would adversely affect the efficiency, capacity and safety of the N25, national primary road.
 - 2. The proposed development could prejudice plans for the delivery of the N25 New Ross bypass PPP scheme, currently under construction which is included in the National Development Plan, 2018-2027, and as an objective of the County Development Plan, 2013-2019. The proposed development would therefore prejudice plans for delivery of this scheme and is considered to be at variance with the provisions of the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (January 2012). The proposed development is therefore contrary to the objectives of the County Development Plan, 2013 2019.

- 3. Pending completion of the N25 New Ross Bypass Scheme, the subject proposal accesses the N25, national primary road, via a local road junction at a location where the 100kph speed limit applies. The proposed is considered to have inadequate sightlines and would create an adverse impact on the national road where the maximum speed limit applies and would be at variance with the national policy in relation to control of frontage development onto national roads.
- 4. Section 2.8 of the DoECLG Spatial Planning and National Road Guidelines address Service Areas and in particular roadside Service Facilities at non-Motorway National Roads and Junctions, which state that a proliferation of service area facilities along rural sections of national roads and/or associated junctions, where the maximum speed limit applies, would create significant safety risks and affect the level of service available to road users, as well as impact on the viability and vitality of existing urban settlements. Sufficient roadside facilities exist on the non-motorway national road network which passes through a significant number of urban towns and villages where such facilities can be provided for in a sustainable manner. As such the proposed development would not be in accordance with the provision of the DoECLG Guidelines.
- Inadequate information with regards to the adequate disposal of surface water on site has been supplied and therefore the proposed development is considered contrary to the proper planning and sustainable development of the area.
- 6. The applicant has failed to supply the necessary written agreement in principle from Irish Water indicating that the connection to the public water and public foul sewer is agreeable and therefore the proposed development is considered contrary to the proper planning and sustainable development.

3.2. Planning Authority Reports

3.2.1. The main issues raised in the planner's report are as follows;

Area Planner

- The proposal is inconsistent with Section 28 of the Guidelines 'Spatial Planning and National Road Guidelines'.
- The proposal would generate significant high volume of right turning movements on the N25, which would endanger public safety by reason of traffic hazard.
- There is inadequate sightline provision.
- There is inadequate information in relation to Irish Water connections, waste and surface water disposal.
- The proposal is contrary to National Roads policy and would create a traffic hazard and also considered contrary to objectives of the County Development Plan, 2013 – 2019.

3.3. Internal Reports;

- <u>Fire Officer</u>; Compliance with Fire Regulations required.
- Environment; Additional information sought in relation to water supply, surface water and waste water disposal, storage and removal of waste, details in relation to fuel storage tanks, fuel pumps, fuel and cleaning agents to be used in car washing, measures to deal with a fuel spill and compliance with EU Regulations, 2011.
- Roads, Transportation, Water Services, Health and Safety; The proposal would create a traffic hazard as (a) the proposed site entrance is located approximately 130m from the junction with the National Road, N25, (b) the N25 junction is located approximately 150m from the subject site, (c) the

proposal is at variance with the official policy in relation to the control of development, (d) the existing national road network is well served in terms of existing service stations.

3.4. Third Party Observations

There are three third party submissions and the issues raised have been noted. A summary of the main issues raised include;

- The proposal is inconsistent with the Section 2.8 of the Spatial Planning and National Roads Guidelines, 2012.
- Inconsistent with Policy Objective T39
- Adverse impact on retail provision.

3.5. Submissions

There is a submission from TII which is summarised as follows;

- The proposal is inconsistent with Section 28 of the Guidelines 'Spatial Planning and National Road Guidelines'.
- The proposal would create an adverse impact on the national road where maximum speed applies.
- The proposal would adversely affect the efficiency, capacity and safety of the N25, national primary road.
- The TII Service Area Policy (2014) does not relate to proposals such as the subject development.
- It is the opinion that single carriageway networks do not experience deficiency as these routes pass through a number of urban areas.
- The proposal would create significant safety risks.

4.0 Planning History

None.

5.0 Policy Context

5.1. **Development Plan**

- 5.1.1. The operational Development Plan is the Wexford County Development Plan, 2013 2019.
- 5.1.2. The appeal site is in a rural area and is not zoned for development.
- 5.1.3. The following sections of the Development Plan are relevant;
 - Section 8.6.5 'Petrol Stations'
 - Section 18.29.3 'Sightlines'
 - Section 18.29.9 'Petrol Filling Stations'

6.0 National Policy

Spatial Planning and National Roads, Guidelines for Planning Authorities, 2012

These guidelines are designed to ensure that development is guided to the most appropriate locations by ensuring that transport and land-use planning considerations are considered at development plan stage.

Retail Planning Guidelines, 2012

Section 2.4.3 outlines that 100m² is the retail floor area cap for service stations irrespective of location.

Section 4.11.9 outlines that in rural areas service stations can have a very important retail function and it is required that the retail element shall be assessed having regard to the sequential approach to retail development. It also outlines that in considering applications for development attention should be given to the safety aspects of circulation and parking.

7.0 **The Appeal**

7.1. A first party appeal was submitted by Cunnane Stratton Reynolds, Planning Consultants, on behalf of the applicant. The submission is summarised as follows;

Introduction

- There is a need for the proposed filling / service station once the bypass becomes operational.
- The proposed facility will only open once the bypass becomes operational.

The main grounds of appeal are summarised as follows;

Road Safety on the N25

- The proposed facility will open once the bypass becomes operational.
- The EIS for the bypass demonstrates that the traffic on the section of road in question will be significantly reduced (in excess of 50%) once the bypass becomes operational.
- The junction capacity study (as part of the Transport Assessment) concluded that for the future design years the proposed development can be accommodated without any significant impact.
- It is proposed to provide a ghost island to address concerns in relation to right turning movements.
- The east bound right turn manoeuvre is to facilitate the relatively small number of traffic coming from New Ross town centre to access the N25/N30.

- On the basis of the traffic assessment and the ghost island it is concluded that the proposed development would not endanger public safety by reason of traffic hazard.
- The applicant is satisfied to accept a condition that they will not open the proposed facility until the bypass is operational.

Delivery of the N25 New Ross Bypass PPP Scheme

- The proposed bypass will be operational before the construction of the proposed facility.
- Accordingly, it is not possible for the proposed development to prejudice plans for the delivery of the N25 New Ross bypass.

<u>Sightlines of the Proposed Development</u>

- It is submitted that the site access is located on a local road (L80561) where the 80km/ph. regulations apply.
- The L80561 will gain access to the reclassified New Ross road corridor. This is a regional route and will be subject to 80kph regulations.
- The regional New Ross road will then be connected to the national road network via the new N25 Ballymacar roundabout junction.
- As such the 100km/ph regulations no longer applies to the site. (drawings no. 180146-9000 and drawing no. 1801469001 confirm the sightlines).
- It is submitted that the 100km/ph sightline (215m) can be accommodated if required on the new N25 access.

Proliferation of Services Area Facilities

 The proposed development is located on the 'Old Wexford Road'/Ballymacar Road which is adjacent to the N25.

- The proposed development would not result in the proliferation of service facilities along national routes.
- There are a number of other facilities which are 'offline' and serve the national road network.
- The Transport Assessment Report completed by MPA Consulting Engineers confirmed that based on the proposed junction geometry the proposed development can be accommodated on the site with no adverse impact on the surrounding road network.
- The modelling results demonstrate that the proposed development and committed development trips that the existing junctions 1 and 2 operate within capacity for future years.
- In terms of safety the following is proposed;
 - An appropriate level of control and accessibility to and from the site is proposed
 - Safety provision has been made for an appropriate level of safety for turning traffic to and from the site
 - Unobstructed sight lines are proposed
 - Proper delineation of the turning zones accessing the site is proposed
- The NRA Service Area Policy 2014 recognises the role service facilities that provide extensive services provide including those that provide for HGV's and remain open 24 hours.
- It is contended that the proposed development would not contribute to the proliferation of service facilities.
- The guidelines do not indicate any threshold that should be applied between service stations.
- It is noted, in a separate case, that in appeal ref. 300054 that the Planning Inspector concluded that a 500m separation distance between filling stations on the R445, Limerick City, would not amount to a proliferation of filling stations.

- It is contended that the existing level of provision within New Ross is comparable to other larger towns within the Wexford County Development Plan settlement strategy, Enniscorthy and Gorey.
- It is submitted that the planning system should not be used to prohibit competition.
- Figure no. 3 of the submission indicates service stations near the appeal site.
- The proposed facility is more familiar to a Type 1 Service Area of which there
 are fewer of in the locality.
- The only services facilities equivalent to the proposed development, i.e. open
 24 hours and including truck fill and parking is as follows;
 - Applegreen in Lemybrien (59km from the site)
 - Maxol in Dungarvan (70km from the site)
 - o Top Oil in Waterford (31.4km from the site)

<u>Precedents</u>

- Cork County Council granted permission (L.A. Ref. 15/6141) for a service station on the R630 just south of the N25.
- The applegreen service station at Lemybrien, located on the N25.
- Circle K and O'Brien Costcutter / Amber which is located onto the N71 south of the N40/N71 interchange at the Bandon Road Roundabout. Granted permission by Cork County Council (L.A. Ref. 11/5210.
- Carlow County Council granted permission (L.A. Ref. 14/342) (appeal ref. 244762) for an off-line motorway service on a site located on the northern side of the M9 at the junction of the N80 and M9 (junction 5).

<u>Irish Water Agreement</u>

- Notwithstanding no agreement from Irish Water it is submitted that the report from DBFL (Engineering Consultants) concludes that connection to both foul and water is feasible.
- It is submitted that a condition could be attached a grant of permission.

8.0 Observations

The following is the summary of an observation from TII;

- NSO 2 of the National Planning Framework includes the objective to maintain the strategic capacity and safety of the national roads network.
- It is an investment priority of the National Development Plan, 2017 2027, to
 ensure that the extensive transport networks that have been greatly enhanced
 in last two decades are maintained to a high level.
- TII seeks to uphold official policy and guidance as outlined in the Spatial Planning and National Roads Guidelines for Planning Authority (2012).
- It is contended that the proposed development is at variance with official policy in relation to the control of development on/affecting national roads.
- It is submitted that the proposed development will be prejudice to the delivery
 of the N25 New Ross bypass an objective of the County Development Plan
 and contravene the statutory guidelines provisions for reasons of proposed
 access to the national road at a location where the maximum speed applies
 and potential traffic generation due to the nature and scale of the proposed
 development.
- The TII submission to the Local Authority is appended to the observation and the Board are requested to take this into account in their consideration (summarised in Section 3.5 above).

9.0 **Responses**

Second Party Response

The following is the summary of a response submitted by the Local Authority;

- It is submitted that the proposed development intends to access the N25
 national primary road, via a local road junction at a location where a 100kph
 speed limit applies.
- The proposal would generate right turning traffic movements that would endanger public safety by reason of traffic hazard and obstruction or road users.
- Inadequate sightline provision.
- The proposed development is inconsistent with the national roads policy.
- The proposal is contrary to the County Development Plan, 2013 2019.
- The junction on the N25 is approximately 150m from entry / exit of under construction at grade roundabout on the New Ross N25 bypass.
- The proposal is at variance with official policy in relation to the control of development.
- The comments of the TII are noted.
- The national road network in this area is already served well in terms of existing service stations.
- Inadequate correspondence submitted from Irish Water
- There is inadequate information available in relation to waste generated and surface water disposal.
- The proposal should be refused permission on traffic safety grounds for the following reasons;
 - The right turning movements on the N25 would endanger public safety
 - The proposed development would prejudice plans for the delivery of the N25 bypass (included in the National Development Plan and County Development Plan).

- The proposal is at variance with the Spatial Planning and National Road Guidelines for Planning Authority.
- o The proposal offers inadequate sightline provisions.
- There are sufficient roadside facilities along this national road.

10.0 Assessment

- Principle of Development
- Traffic Safety / Access
- Retail
- Appropriate Assessment Screening
- Surface Water / Foul Sewage
- EIA Screening

10.1. Principle of Development

- 10.1.1. The operational County Development Plan is the Wexford County Development Plan, 2013 2019. The appeal site is in a rural area and is therefore an un-zoned site. The objectives of the land use zoning in a development plan is to serve as a guideline for the control of development to achieve the goals set out in the plan. Usually where no specific use zoning is indicated, the primary use can be assumed to be that already existing in the area. In this particular instance the primary use is agriculture.
- 10.1.2. The principle of the proposed development, provided that the adjoining amenities are protected, would generally be open for consideration.

10.2. Traffic Safety / Access

- 10.2.1. Section 2.8 of the Spatial Planning and National Roads Guidelines for Planning Authorities, 2012, advises in relation to 'Roadside Service Facilities at Non-Motorway National Roads and Junctions'. It is advised that the proliferation of service area facilities along rural sections of national roads and /or associated junctions, where maximum speed limit applies would create a significant safety risk and impact on the viability and vitality of existing urban settlements. The proposed service station is located off a local road however the proposed access from the proposed filling station onto the local road is situated approximately 60 metres from a national primary road, i.e. the N25.
- 10.2.2. Furthermore, the guidelines advise that sufficient road side facilities exist on non-motorway national road network and also passes through a number of urban towns and villages where such facilities can be provided in a sustainable manner.
- 10.2.3. This submission from Transport Infrastructure Ireland (TII) considers that the proposed development could prejudice the delivery of the N25 New Ross Bypass PPP Scheme. The TII considers that as the proposed scheme accesses onto a local road which in turn accesses onto a national primary road where the maximum speed limit applies, i.e. 100km/ph. The TII is of the opinion that this would be at variance with national policy. Furthermore, the TII considers that right-turning movements on a national primary route would endanger public safety by reason of traffic hazard and obstruction of road users and would adversely affect the efficiency, capacity and safety of the N25. The TII submission also refers to Section 2.8 of the Spatial Planning and National Roads Guidelines for Planning Authorities, 2012, and that the proposal would not be in accordance with these relevant guidelines. I would note that the Local Authority internal report from the Roads, Transportation, Water Services, Health & Safety Section, dated 29th June 2018, generally supports the submission from the TII.
- 10.2.4. In relation to capacity and potential impacts of traffic generation from the proposed development the submitted Transport Assessment Report provides an assessment

on the impact of the proposed development on the established network. Chapter 4 of this document summarises the process of vehicle trip generation, distribution, and network assignment in addition to qualifying the potential level of impact upon the local network. Chapter 5 sets out the assessment of impacts and it is notable that the conclusion is that the overall impact on the existing road network is not significant. I note specifically that the predicted level of queuing is low, i.e. less than one and that it is estimated that a Flow to Capacity (RFC) of 0.06 for the AM peak and 0.06 for the PM peak and this again is low.

- 10.2.5. The proposed sightline provision is set out on drawing no. 171052/C/003 and the sightlines provide for 90m in each direction from a setback distance of 2.4m onto the local road. The submitted drawings that accompanied the appeal submission illustrate a sightline provision of 160m in either direction from the proposed vehicular access onto the same local road. The appeal submission also includes a second drawing that illustrates a sightline provision from the local access road onto the national primary road (N25). This vehicular access provides a sightline provision of 160m in either direction where a speed limit of 80kph applies or a sightline provision of 215m in either direction where a speed limit of 100kp/ph applies. The purpose of the two speed limits is to provide for a scenario where the national road is declassified as a regional road. The revised plans in accordance with the appeal submission also includes provision for a ghost island on the national primary route which will prevent right-turning movements. I would also note that the applicant is prepared to accept a condition that the proposed filling station is opened after the N25 Bypass becomes operational. This would effectively address the Local Authority's reason for refusal no. 2.
- 10.2.6. Overall, I would consider that the proposed development would effectively reduce capacity of the national primary road having regard to the scale of the proposed development and would endanger public safety by reason of traffic hazard having regard the proximity to the junction of the N25 New Ross bypass. The proposed development would also contravene the objectives of the planning authority (which are considered reasonable) to preserve the level of service and carrying capacity of the National Primary Road and to protect the public investment in the road.

10.2.7. Finally, the proposed development would be contrary to Section 2.8 of the Spatial Planning and National Roads Guidelines for Planning Authorities, 2012, which advises in relation to 'Roadside Service Facilities at Non-Motorway National Roads and Junctions'.

10.3. **Retail**

- 10.3.1. The overall floor area of retail provision in the proposed development is 100 sq. metres. However, the overall floor area of the shop building is 600 sq. metres and other uses within this shop building include deli area, food units, seating and toilet facilities.
- 10.3.2. Section 18.29.9 of the County Development Plan, 2013 2019, sets out guidance in relation to petrol filling stations. In relation to uses this section advises that 'the size of convenience retail component / range of goods for sale may be limited having regard to location, retail facilities available in vicinity adequacy of parking and traffic safety'. The Local Authority's planner's report has not outlined any objections to the proposed development on land-use grounds.
- 10.3.3. Section 2.4.3 of the Retail Planning Guidelines, 2012, outlines that 100m² is the retail floor area cap for service stations irrespective of location.
- 10.3.4. Overall, I would conclude that the proposed retail provision is acceptable and in accordance with both local and national policy.

10.4. Appropriate Assessment Screening

10.4.1. The appeal site is situated approximately 3km from the River Barrow which is a designated Natura 2000 site (River Barrow and River Nore SAC, site code 002162). In accordance with the Conservation Objectives contained on the National Parks and Wildlife Services website (www.npws.ie) for this Natura 2000 site there are twenty

two qualifying interests. A key conservation objective is the maintenance of habitats and species within the Natura 2000 site at favourable conservation conditions as this will contribute to the overall maintenance of favourable conservation status.

Therefore, I would consider that a significant issue is the potential impacts of the proposed development on water quality of the River Barrow.

- 10.4.2. It is proposed that the proposed development will have a surface water management system which includes SUDs. The proposal includes an underground storage tank for surface water runoff and it is proposed that surface water runoff will be controlled. The surface water will be treated, by petrol receptors, prior to entering the underground storage tank. In relation to foul drainage it is proposed to connect to the public foul network.
- 10.4.3. The application documentation includes an Appropriate Assessment Screening prepared by Scott Cawley, Ecologists. In accordance with the Screening report it is submitted that the foul waters from the proposed development will connect to the New Ross WWTP which has an operating capacity of 16,000 P.E. The treated waste water from the WWTP is discharged to the River Barrow Estuary however the AA Screening report states that the discharge is not having an observable effect on water quality in the receiving water course and this is confirmed by the EPA (2017). The report submits that the WWTP has sufficient capacity to treat foul waters from the proposed development and the plant would not have a measurable impact on receiving waters.
- 10.4.4. The report from Scott Cawley also considers that the surface water management proposals are acceptable. The report also considers that any pollution from surface water will be confined to storm events during the construction phase. I would acknowledge that this would be temporary in nature however the report from Scott Cawley considers that any sediments and other pollutants that do not enter the surface water network will be absorbed and diluted such that there will be no discernible effect on the water quality within the SAC.

10.4.5. It is reasonable to conclude that based on the information on the file, which I consider adequate to issue a screening determination, that the proposed development, individually or in combination with other plans or projects would not be likely to have a significant effect on any European Sites, i.e. site code 002162 in view of the sites conservation objectives and a stage 2 AA is therefore not required.

10.5. Surface Water / Foul Sewage

- 10.5.1. The Local Authority refusal reason no. 5 stated that there was inadequate surface water information and as such the proposed development was contrary to the proper planning and sustainable development of the area.
- 10.5.2. In the response the appeal submission sets out the details of the proposed surface water management. The proposed development provides for a piped network with an underground stormtech attenuation system which provides a storage volume of 420 sq. m. The proposal includes measures to reduce runoff rates for the site by providing control of run-off at source. The site is located within an area designated Flood Zone C as such the proposed use would not represent a significant flood risk. Overall, I would conclude, based on the submitted drawings and submissions that subject to a compliance condition that the proposals for surface water management are acceptable.
- 10.5.3. In relation to foul drainage I would note from the submitted report from Scott Cawley that the local foul drainage is pumped to the New Ross WWTP and following treatment it is discharged to the Barrow Estuary. The report from Scott Cawley indicates that there is sufficient capacity to accommodate the proposed development and the discharge from the WWTP is treated with no observable impacts on water quality.
- 10.5.4. I would recommend, should the Board favour granting permission, that this issue is dealt with by condition.

10.6. **EIA Screening**

10.6.1. Based on the information on the file, which I consider adequate to issue a screening determination, it is reasonable to conclude that there is no real likelihood of significant effects on the environment arising from the proposed development and an environmental impact assessment is not required.

11.0 Recommendation

11.1. I have read the submissions on the file, visited the site, had due regard to the County Development Plan, and all other matters arising. I recommend that planning permission be refused for the reasons set out below.

12.0 Reasons and Considerations

- 1. It is considered that the proposed development would endanger public safety by reason of traffic hazard because the site accesses onto a local road which in turn accesses onto a national primary route where the speed limit of 100kph applies and the traffic turning movements generated by the development would interfere with the safety and free flow of traffic on the public road. The proposed development would also contravene the objectives of the planning authority (which are considered reasonable) as set out in Section 8.6.1 of the Wexford County Development Plan, 2013 2019, to preserve the level of service and carrying capacity of the National Primary Road and to protect the public investment in the road.
- 2. The proposed development would be contrary to Section 28 Ministerial guidelines. Section 2.8 of the DoECLG 'Spatial Planning and National Road' Guidelines for Planning Authorities (2012) address Service Areas and in particular roadside Service Facilities at non-Motorway National Roads and Junctions, state that a proliferation of service area facilities along rural sections of national roads and/or associated junctions, where the maximum speed limit applies, would create significant safety risks and affect the level of service available to road users, as well as impact on the viability and vitality of

existing urban settlements. The guidelines advise that sufficient roadside facilities exist on the non-motorway national road network which passes through a significant number of urban towns and villages where such facilities can be provided for in a sustainable manner.

Kenneth Moloney

Planning Inspector

28th November 2018